

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 <https://concordialand.com.au/> 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 <https://concordialand.com.au/concordia-and-gawler/> , 7 August 2019

³ <https://concordialand.com.au/concordia-and-the-barossa/>, 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, identify, 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.

⁴ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

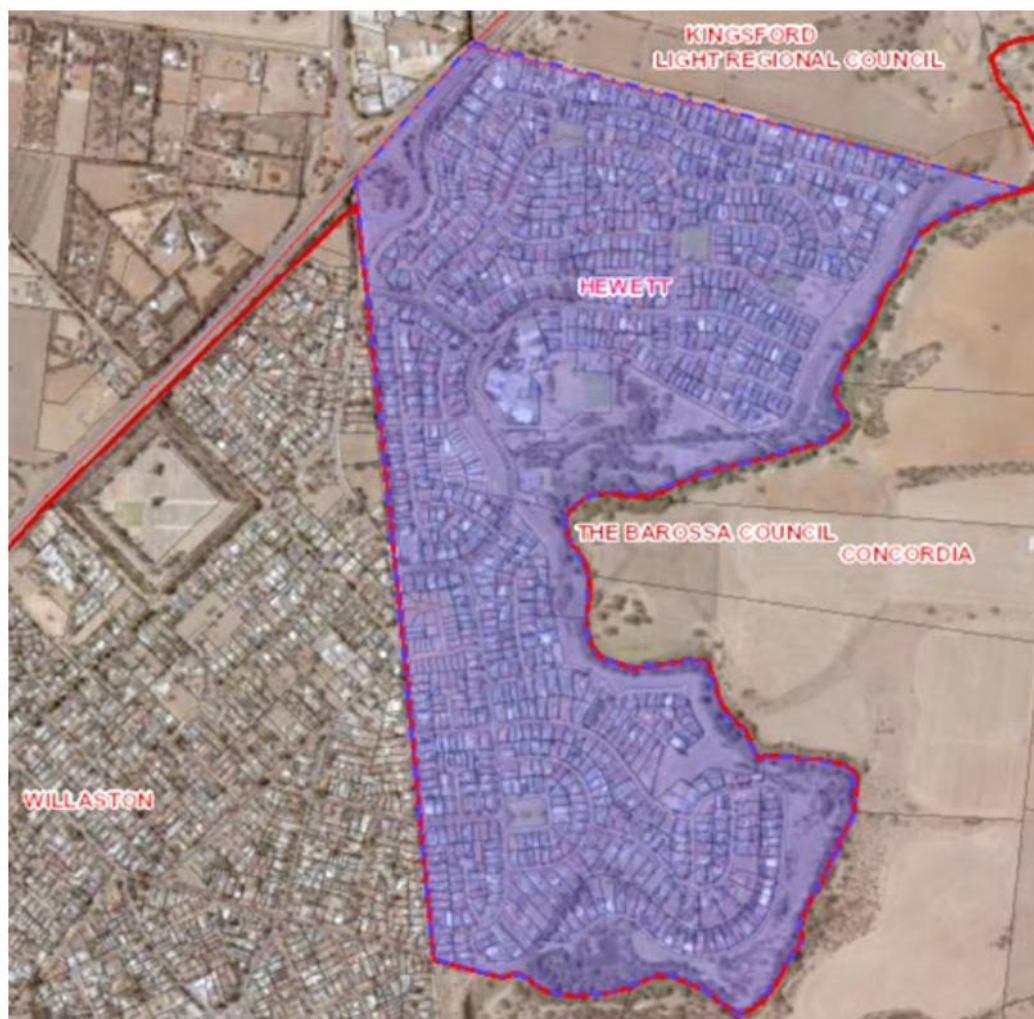
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).
- Human 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.

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)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.

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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.

⁶ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

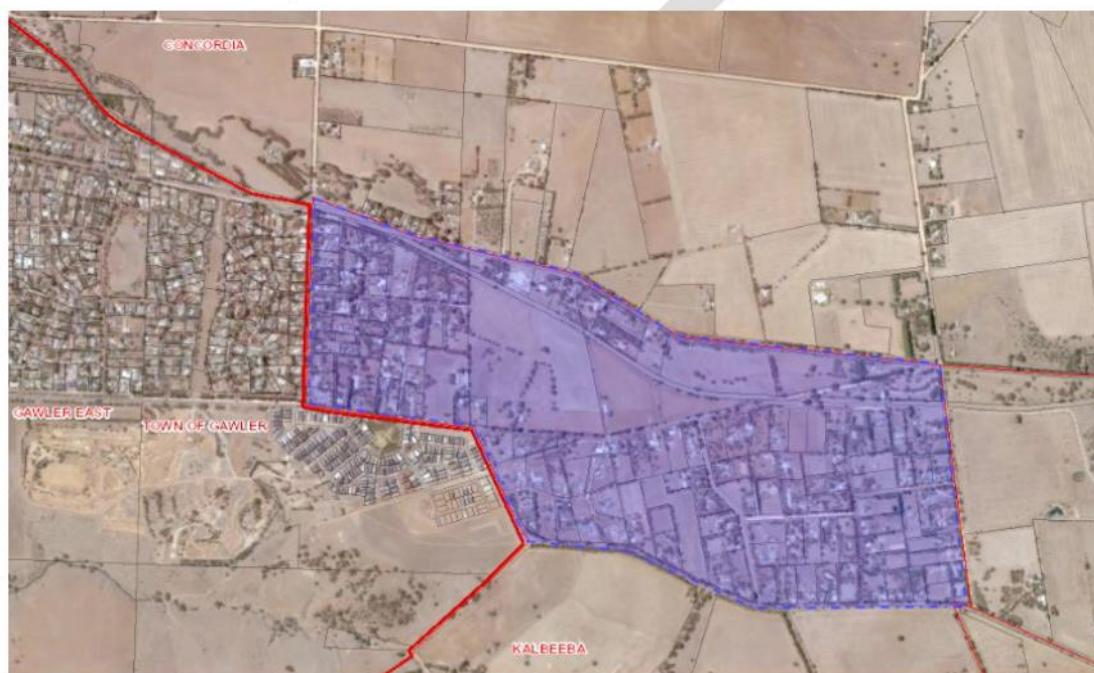
The benefits of regional collaboration are acknowledged and opportunities for further collaboration to advance our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the 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.

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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.

⁷ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

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

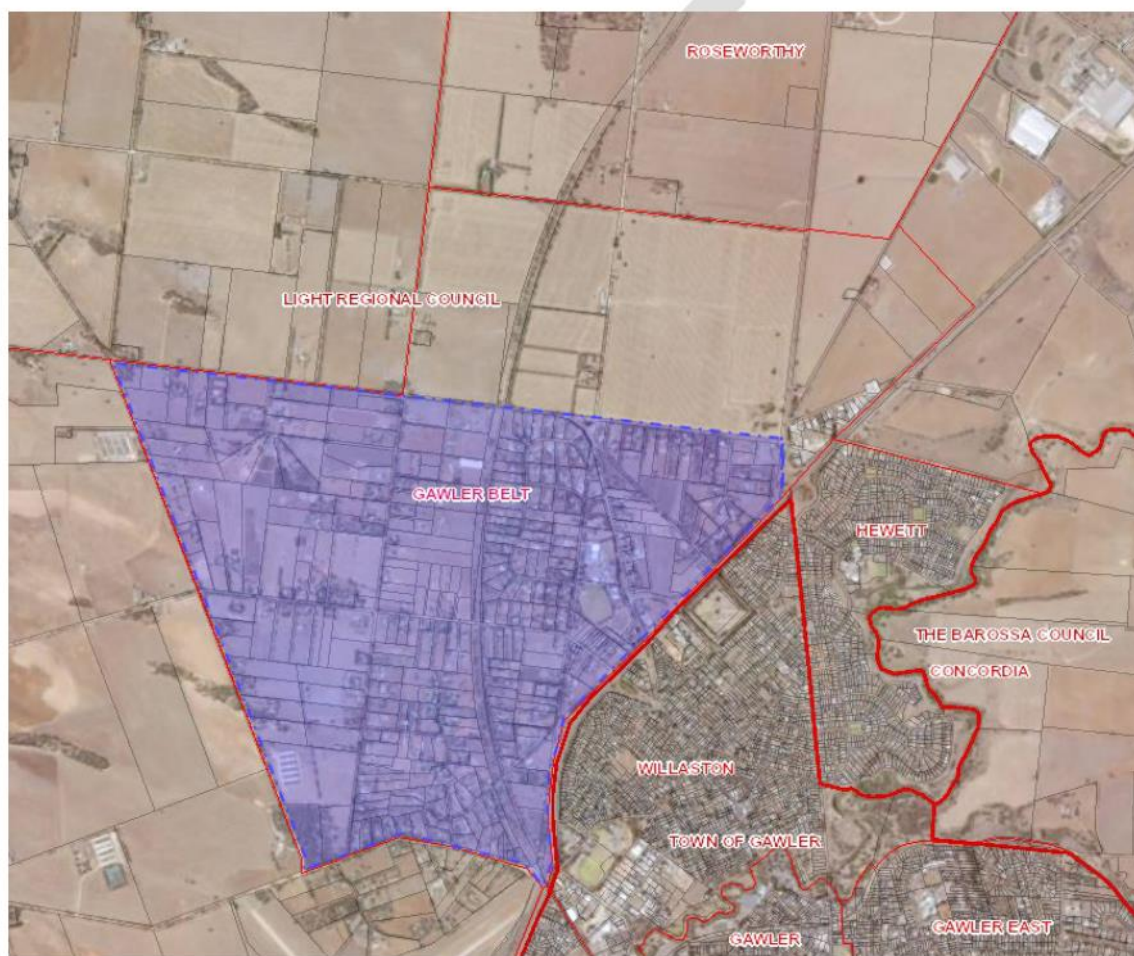
The benefits of regional collaboration are acknowledged and opportunities for further collaboration to advance our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the 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, identify, 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).

¹⁰ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

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

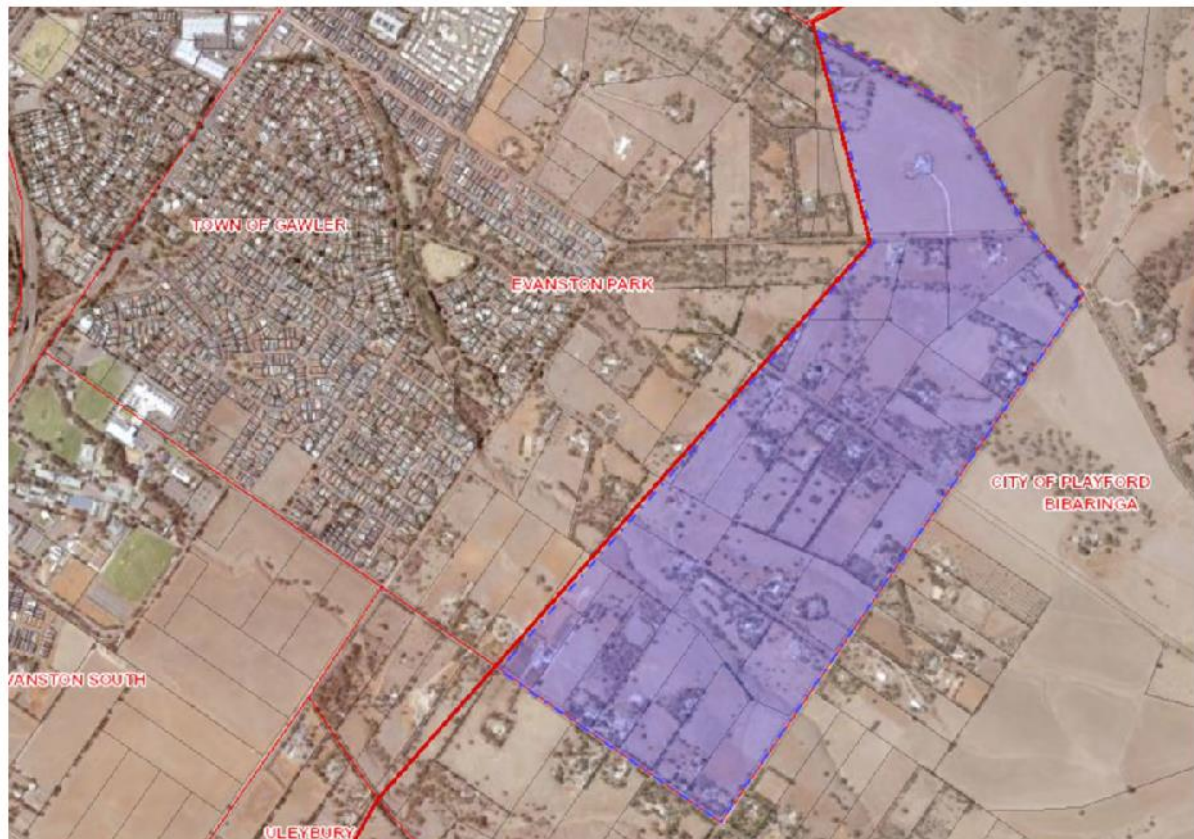
The benefits of regional collaboration are acknowledged and opportunities for further collaboration for the benefit of our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through 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.

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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, identify, 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

¹¹ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

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.

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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

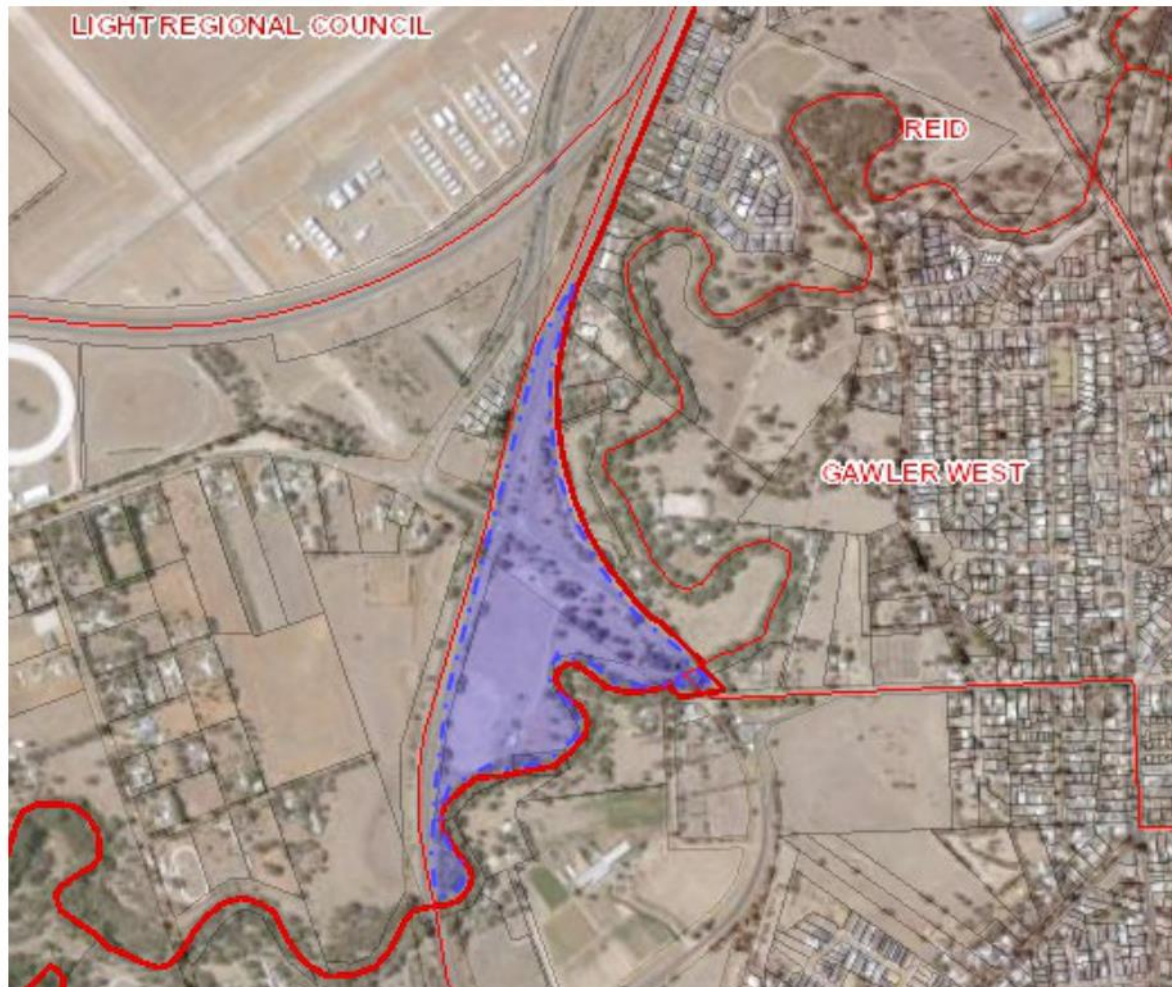
Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- 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.

¹² <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

- 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 on 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)

¹³ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

- 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.

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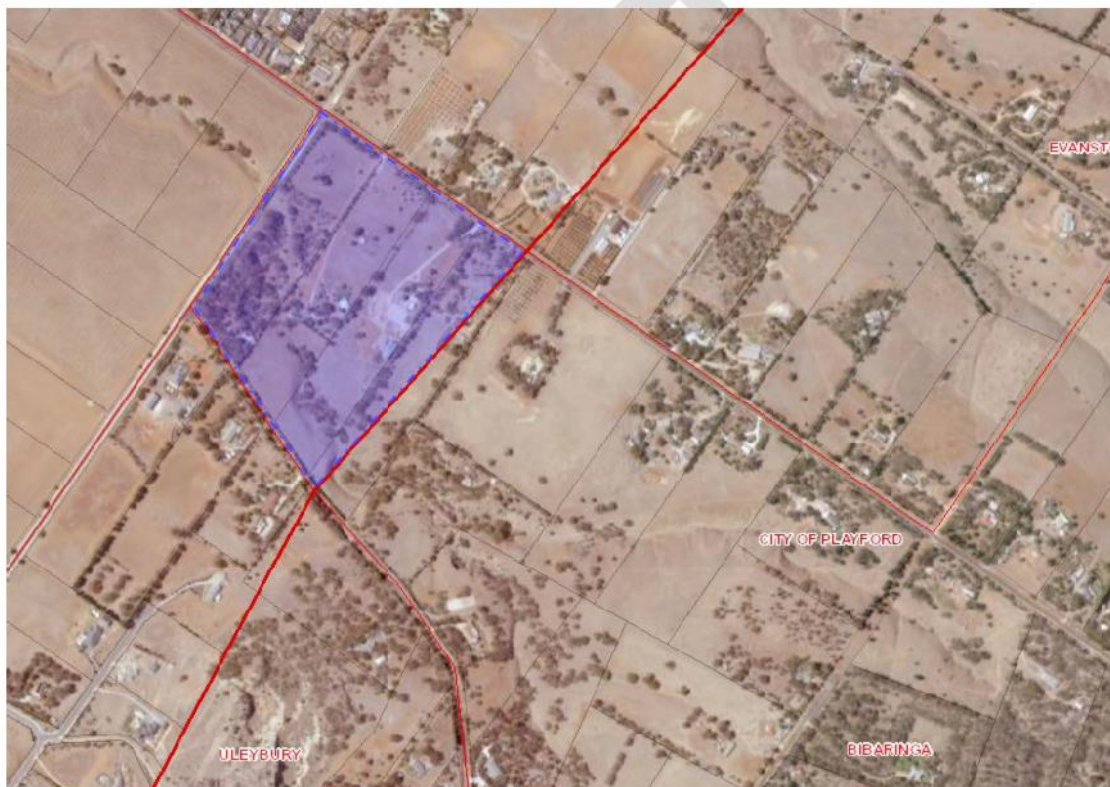
3.8 Bibaringa (Area 8) and Uleybury (Area 9)

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.

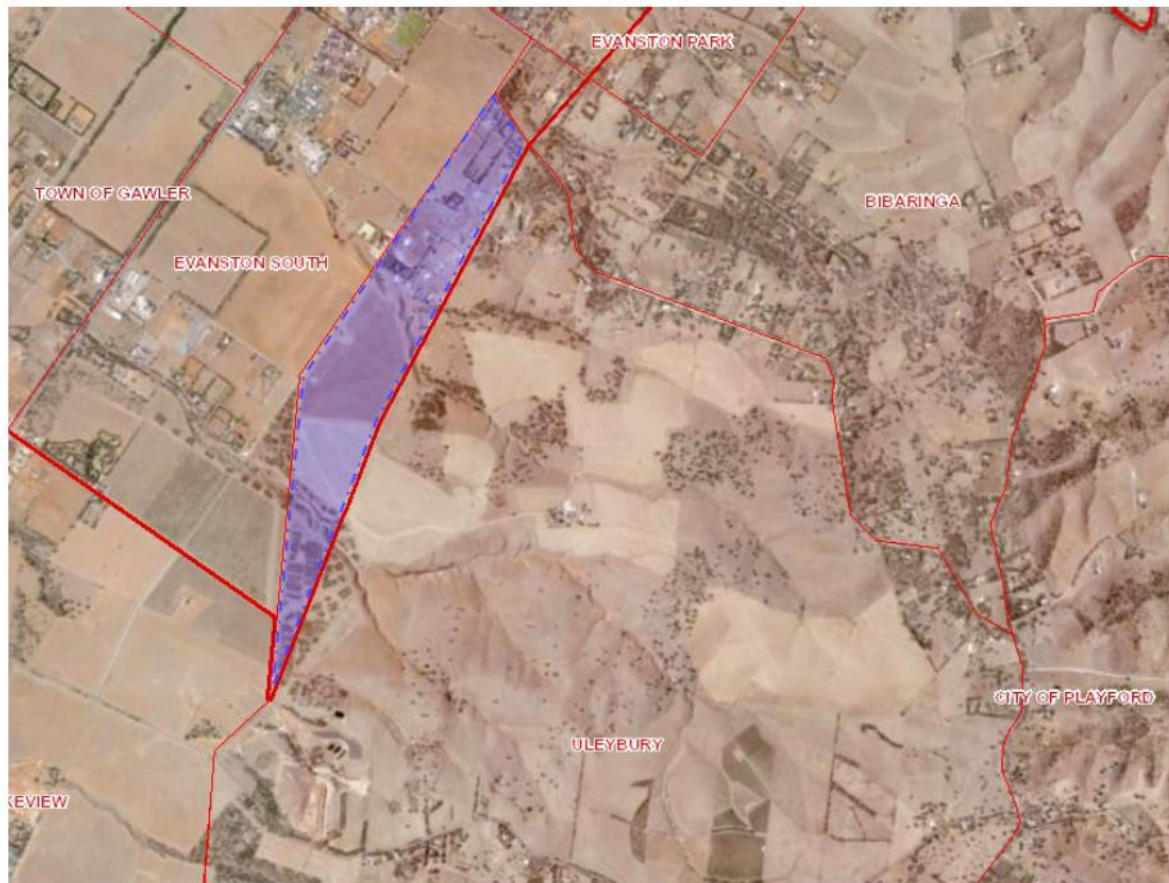
The current boundary intercepts 1 property in Bibaringa and a further 3 in Uleybury.

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 Bibaringa 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).

¹⁴ <http://www.lga.sa.gov.au/webdata/resources/files/Representation%20Quotas%202018-19.pdf>

- 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.

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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 [$\pm 7\%$], 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%.

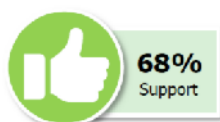
This project was carried out in compliance with ISO 20252 - Market, opinion and social research, including insights and data analytics — Vocabulary and service requirements.

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.**

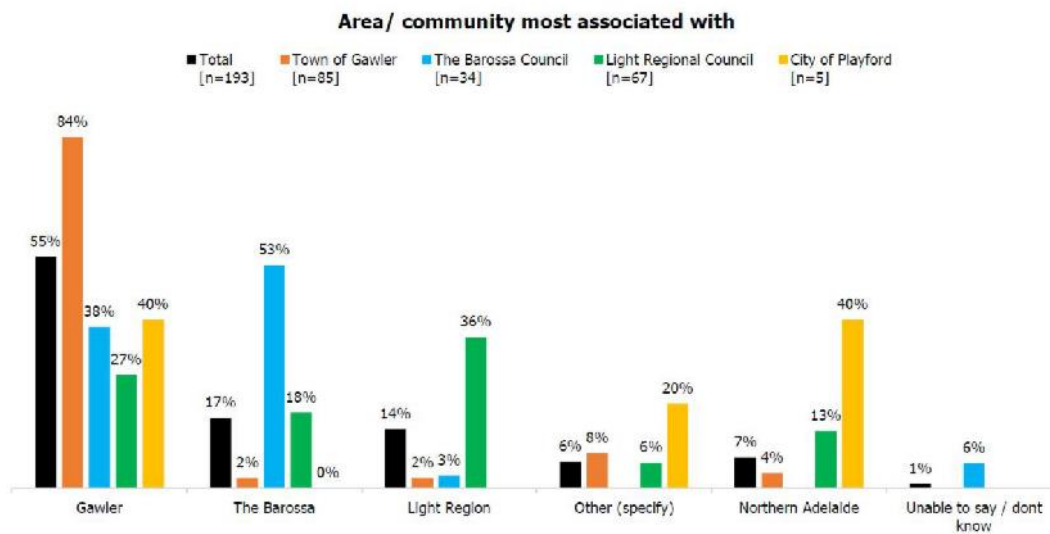
From what you know or have been told, do you support or oppose Council's Proposal to have the South Australian Boundaries Commission further investigate potential changes to the Town of Gawler's council boundaries?



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?"

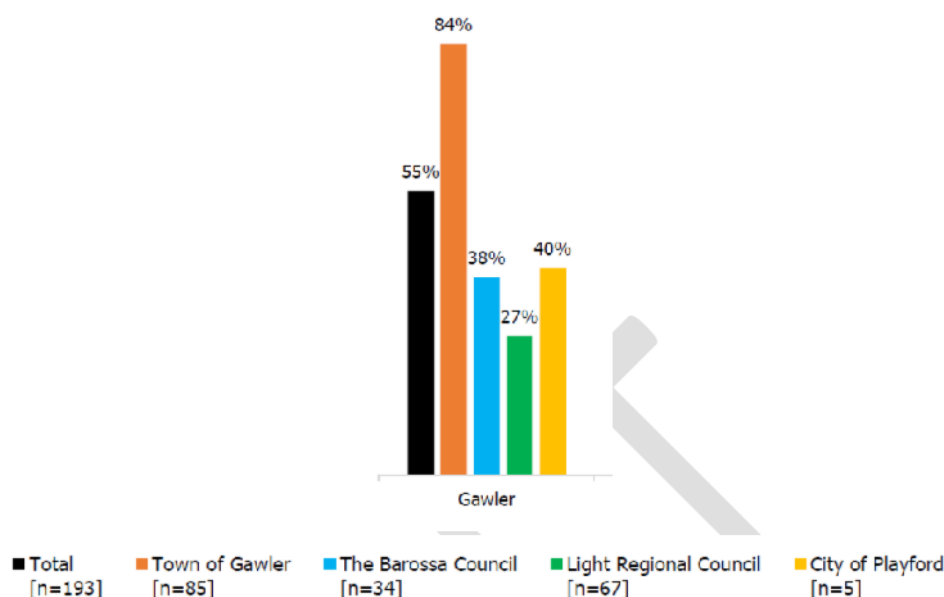
- 38% and 27% of Barossa Council and Light Regional Council residents most associate with the Town of Gawler



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.

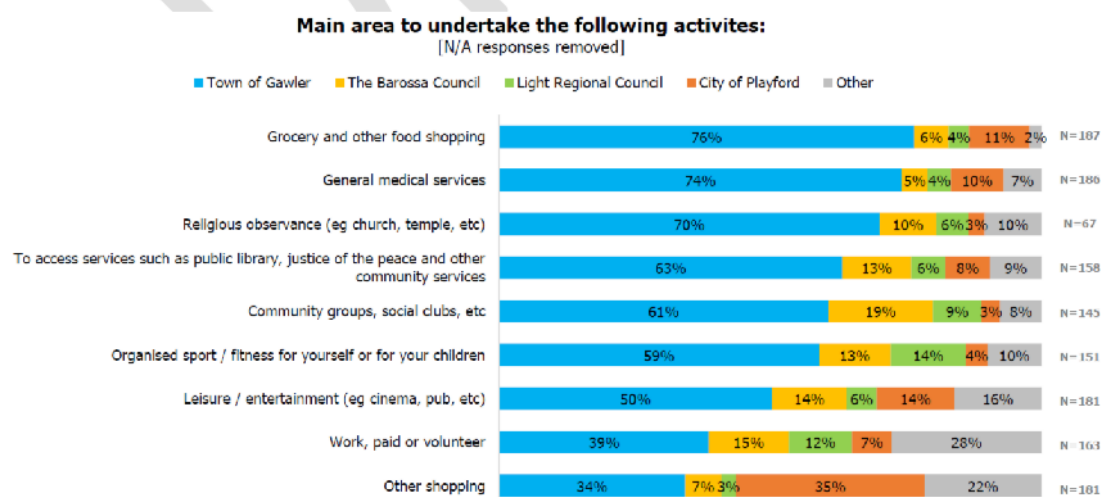
In fact 38% of respondents from The Barossa Council LGA, 27% of respondents of the Light Regional Council LGA and 40% of respondents from the City of Playford LGA indicated they or others in their household were most associated with the Gawler Community rather than their own Council area as shown in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



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.

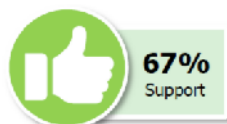
Areas suggested to be removed from Gawler are Bibaringa and Uleybury.



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	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	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	2017-2027 Community Plan – Boundary Reform was highlighted as a strategic direction within Goal 1.1.3
12-09-2017	Advice to Mayor - Local Government Boundary Adjustment Amendment Act 2017 has been assented - Thanks for submission - Hon Geoff Brock MP
21-12-2018	Official Media Release – Priorities moving forward
10-05-2019	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	Council resolved to investigate its boundaries following a Motion on Notice presented by Mayor Redman 28 May 2019 Council Meeting Agenda 28 May 2019 Council Meeting Minutes
29-05-2019	Official Media Release – Council to Investigate its Boundary
03-06-2019	Letter to Mayor Bim Lange – Barossa Council – Resolution 2019:05:COU001
10 September 2019	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. Areas to be included in the Town of Gawler: Area 1- Concordia Growth Area Area 2 - Hewett Area 3 – Portion of Kalbeeba (including portion of Springwood)

	<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</p> <p>10 September 2019 Special Council Meeting Agenda Attachments</p> <p>10 September 2019 Special Council Meeting Minutes</p>
16-09-2019	Official Media Release – Gawler to investigate boundary reform to future-proof population expansion
17-09-2019	Facebook Post – Official Media Release - Gawler to investigate boundary reform to future-proof population expansion
18-09-2019	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	TOG Mayor to Playford Mayor - Special Council Meeting held on 10 September 2019
18-09-2019	TOG Mayor to APC Mayor - Special Council Meeting held on 10 September 2019
18-09-2019	TOG Mayor to LRC Mayor - Special Council Meeting held on 10 September 2019
18-09-2019	TOG Mayor to Barossa Mayor - Special Council Meeting held on 10 September 2019
24-09-2019	Question on Notice – Cr I Tooley – response provided
25-09-2019	Meeting on Boundary Reform – all Mayors and CEOs of affected Councils invited – attended by Mayor and CEO's of The Barossa Council and TOG only
02-10-2019	The Bunyip – Page 12 – boundary reform no rates grab Mayor Redman
02-10-2019	The Leader - Page 1 and 4 - Light Regional Council Mayor Bill O'Brien Under Threat - boundary reform
09-10-2019	The Leader - Page 18 - Letters to the editor - Mayor Bill O'Brien Light ~ boundary reform article was well balanced and fair
09-10-2019	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	Letter to Boundary Commission – response to Hickinbotham

22-10-2019	Motion on Notice (adjourned items) – Cr I Tooley – motion was Lost
28-10-2019	Letter to Boundary Commission – Gawler and Barossa Proposals
31-10-2019	Boundary Commission Update
26-11-2019	2018-2019 Annual Report – key Objective
26 November 2019	<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</p> <p>26 November 2019 Council Meeting Agenda Attachments</p> <p>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
09-12-2019	Official Media Release – Town of Gawler to forward proposal to Boundary Commission
11-12-2019	The Bunyip - Page 7 - Civic Centre scoops multiple planning awards - boundary reform a long time coming Mayor Redman
12-12-2019	Facebook Post – Official Media Release - Town of Gawler to forward proposal to Boundary Commission
16-12-2019	LRC Mayor to TOG Mayor – views on TOG Stage 1 Proposal Submission
18-12-2019	Facebook Post – Mayor Karen Redman provides an overview from 17-02-2019 Council Meeting
06-01-2020	Advice to Mayor - Notification of Stage 1 Potential Boundary Proposal from the Barossa Council - the Boundaries Commission
13- 02-2020	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	<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

	<ul style="list-style-type: none"> 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</p>
27-02-2020	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	Letter to Boundaries Commission seeking clarification
12-03-2020	Letter to Adelaide Plains Council Mayor regarding Boundary Reform March 2020 - update re resolution to proceed
19-03-2020	Letter to City of Playford regarding Boundary Reform March 2020 - update regarding resolution to proceed
20-03-2020	LRC Mayor O'Brien to Mayor Redman – TOG is progressing with its boundary reform considerations
21-04-2020	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	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	Light Regional Council Mayor to TOG Mayor – Resolution of Council 28 April 2020
5-05-2020	Meeting between TOG and Office of Local Government Staff to clarify matters of consultation and letter of response from Commission
06-05-2020	Facebook Post – Councillor Cody Davies – Light Regional Council has submitted a proposal that the Gawler Community will be destroyed and its suburbs split between three other councils
06-05-2020	The Bunyip – Page 1 and 4 – Light Regional Council boundary reform proposal Goodbye Gawler - submission illogical says Mayor Redman
07-05-2020	Letter to LRC from Mayor Karen Redman – TOG to withdraw or defer proposal
11-05-2020	Email to Commission from TOG CEO Henry Inat requesting further clarification and considerations.
18-05-2020	Light Regional Council Mayor to TOG Mayor – Regional Structural Reform – LRC lodged a proposal with the Boundaries Commission
11-05-2020	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	Response from Light Regional Council – declining to provide further asset data

16-06-2020	Response from The Barossa Council – declining (at this time) to provide further asset data
6-07-2020	Response from Boundaries Commission to TOG regarding points of clarification
28 July 2020 Council Meeting	<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 28 July 2020 Council Meeting Minutes</p>
28-07-2020	Facebook Post – Ordinary Council Meeting – Boundary Reform Proposal update
29-07-2020	Facebook Post – Mayor Karen Redman talks Boundary Reform with CEO Henry Inat (video)
29-07-2020	The Bunyip – Page 3 - Mayor plans LGA presidency run - public consultation nears on boundary reform proposal
04-08-2020	Official Media Release – Town of Gawler Boundary Reform Update
05-08-2020	The Bunyip – Opinion – Page 6 – Have your say on boundary reform proposal
05-08-2020	The Bunyip – Page 5 – Hostile Takeover – Hewett survey shows resistance to boundary reform – Light Regional to prepare own consultation
05-08-2020	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	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	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	The Bunyip – Opinion – Page 6 – Hands Off Hewett
19-08-2020	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	Official Media Release – Gawler's Boundary Change Proposal opens for consultation
26-08-2020	Consultation Opens - Public Notices – The Bunyip Page 36 – Have your say public consultation advertisement
26-08-2020	The Bunyip Page 13 – Boundary Expansion consultation opens

31-08-2020	Facebook Post – Consultation Survey and Open Forum
02-09-2020	The Bunyip – Page 2 – pause of Lights Boundary Consultation
04-09-2020	Facebook Post – Open Forums – 21 and 28 September 2020
04-09-2020	Facebook Post – Open Forum
07-09-2020	Facebook Post – Consultation Survey
Week of 7-09-2020	Boundary Reform Consultation flyer included as insert in approximately 9,800 rates notices.
09-09-2020	Facebook Post – Open Forum
13-09-2020	Facebook Post – Consultation Survey
15-09-2020	Facebook Post – Open Forum
16-09-2020	Facebook Post – The Bunyip – Important Information – Open Forum
16-09-2020	Half Page Bunyip Advert – Have your say on Boundary reform – open forum
17-09-2020	Facebook Post – Consultation Survey
21-09-2020	Facebook Post – Open Forum
21-09-2020	Open Public Forum held at the Gawler Sport and Community Centre – open to all
23-09-2020	The Bunyip – Page 3 – Gawler Council Talks Boundary Reform
23-09-2020	The Bunyip – Page 6 – Editorial – Boundary Reform battle continues
24-09-2020	Facebook Post – Consultation Survey
27-09-2020	Facebook Post – Open Forum
28-09-2020	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
30-09-2020	The Bunyip – Page 6 – Editorial – Boundary reform a rip off – real boundary reform
30-09-2020	The Bunyip – Page 2 – tough questions asked at boundary reform forum – Barossa responds to Gawlers boundary reform survey
01-10-2020	Facebook Post - Consultation Survey
02-10-2020	Letter from The Barossa Council Mayor Lange to Mayor Karen Redman regarding Town of Gawlers Proposal
05-10-2020	Facebook Post – Consultation Survey
07-10-2020	The Bunyip – Page 6 - Editorial – Cost savings in boundary reform?
07-10-2020	The Bunyip – Page 20 – last chance to have your say at the boundary reform consultation

7-10-2020	Consultation Closed – 5pm
27-10-2020	Letter from Mayor Redman to The Barossa Council Mayor ~ submission to the public consultation on Gawler s Proposal for Boundary Reform
3 rd November 2020 Special Council Meeting	<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>
11-11-2020	The Leader – Page 4 – Neighbours oppose Gawler Council Boundary Reform Proposal
24-11-2020	Facebook Post – Ordinary Council Meeting – Motion of Notice
24-11-2020	Council Report 16.2 Motion of Notice – Cr Tooley – Motion was lost.
02-12-2020	The Bunyip – Page 15 – Boundary Reform survey results reviewed
15-12-2020	<p>Council considered under item XX.X 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: [outcome of Council resolution to be inserted here prior to submission]</p>

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.

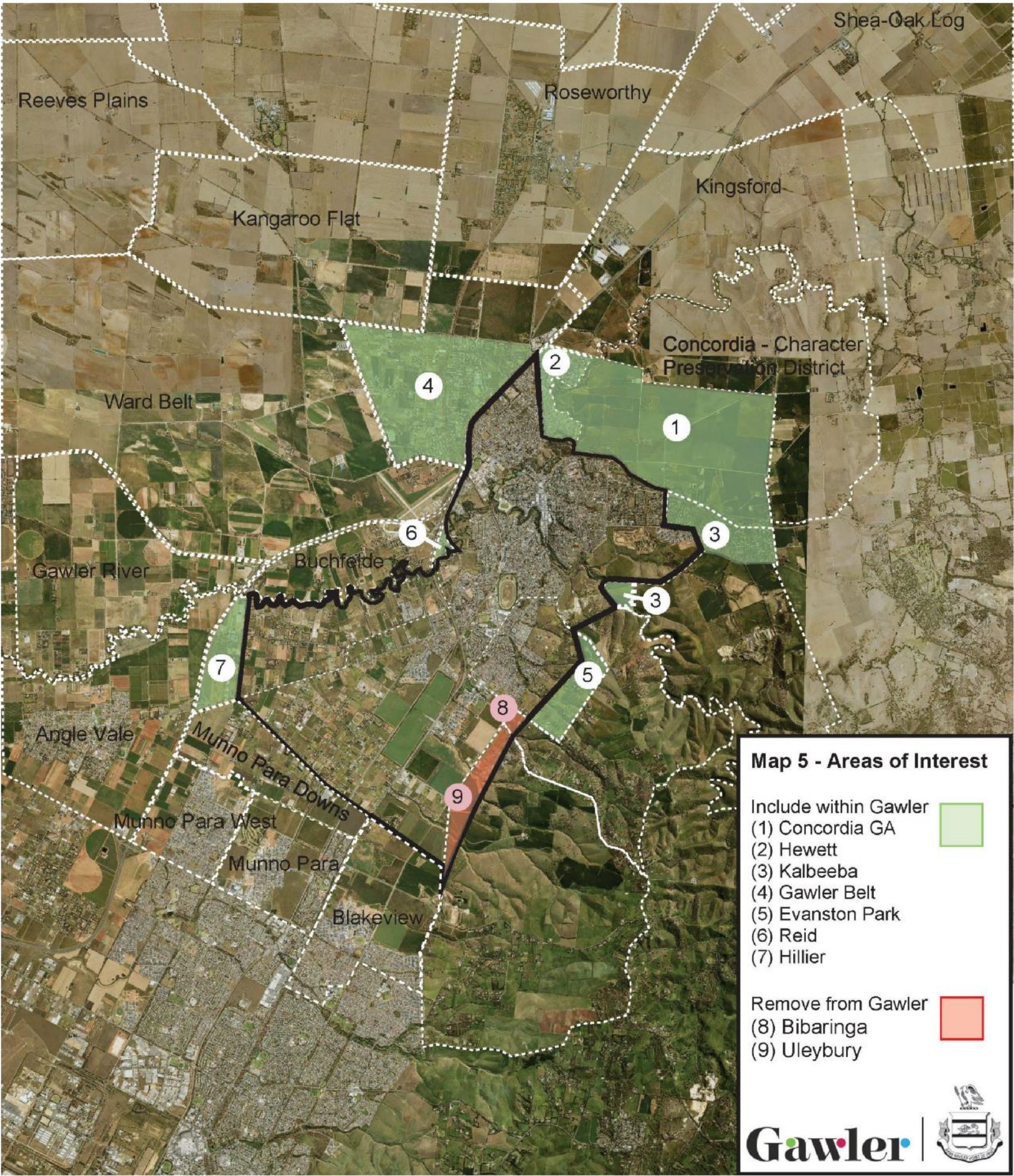
Light Regional Council has voiced its dissent with Town of Gawler's Proposal indicating that the loss of areas such as Hewett and Gawler Belt will impact on its long term viability. Town of Gawler recognises the impact of a reduced rate income on Light Regional Council if boundary reform occurred as 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.

ATTACHMENT 1 – AREAS OF INTEREST SUMMARY MAP AND DETAILED MAPS OF AREAS OF INTEREST



[Further maps to be attached showing Areas of Interest, including road names to provide further detail]

ATTACHMENT 2 – HIGH LEVEL FINANCIAL ANALYSIS – AREAS OF INTEREST

The Table below outlines the indicative 'high-level' operating financial analysis, inclusive of a provision for variable, fixed, and semi-fixed costs, in three years' time. It is conservatively modelled on the communities of interest incurring indexed General Rates based upon their existing Council rates structure.

Table 1. – Indicative 'high-level' Operating analysis from date of Boundary adjustment

	\$'000s	\$'000s
Operating Revenue:		
Existing Town of Gawler *	34,000	
'New' revenue - Communities of interest (<i>based on indexed indicative costs included in the 10 September 2019 report</i>)	<u>4,810</u>	
TOTAL Operating Revenue		38,810
Operating Expenditure:		
Existing Town of Gawler *	34,000	
'New' expenditure - Communities of interest: Variable costs**	4,270	
'New' expenditure - Communities of interest: Other costs – staffing (4.0FTE including on-costs)	360	
'New' expenditure – Communities of interest: Other costs – excl. staffing	<u>180</u>	
TOTAL Operating Expenditure		38,810
Net Operating Result – Surplus/(Deficit)**		0

*Based on existing Long Term Financial Plan projection, which assumes financial forecasts for the intervening years are achieved consistent with projections included in the Plan

**Based on indexed indicative costs included in the 10 September 2019 report - <https://s3-ap-southeast-2.amazonaws.com/tog-public-assets/agendas-minutes/Council/10-09-2019-Council-Agenda-Special.pdf>

***An important disclaimer is that the indicative balanced operating result does not provide for any increased interest costs as a result of increased borrowings to fund additional capital works (over and above the value already provided for in the Long Term Financial Plan) towards potential infrastructure backlogs within the Communities of Interest.

A further point of consideration is that Council's existing Long Term Financial Plan is particularly predicated on capping future capital works expenditure to an indexed \$6.3m, such that Council will have the capacity to materially reduce its debt over coming years so that it can incrementally increase its future borrowing capacity for its next iconic asset investment (in this regard, earlier this calendar year Council recognised its next iconic projects as being the Karbeethan Reserve redevelopment and a regional Aquatic Centre). It is noted that Council's Corporate and Community Services Committee at its meeting on 13 November 2019 received update reports on both the Karbeethan Reserve Master Plan and Essex Park Master Plan.

The existing Long Term Financial Plan forecasts that, all else being equal, and with enshrined financial discipline, Council will be able to reduce its debt by over \$7m between 2020/21 and 2024/25 and, over the same period, reduce its Net Financial Liabilities Ratio from 90% to 57%. Should such targets be realised, the existing Town of Gawler would have accumulated new loan borrowing capacity of approximately \$12m as at 30 June 2025 (based on maintaining the Net Financial Liabilities Ratio at 90%, which is within Council's existing maximum policy position of 100%).

However, in the event of various material infrastructure backlogs being acquired from the Communities of Interest, an expanded Town of Gawler could face emerging challenges relative to its capital works program priorities.

Such challenges may be further exacerbated by the potential need for capital investment in flood mitigation infrastructure within the Gawler Belt area.

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ATTACHMENT 3 – CONSULTATION AND COMMUNICATIONS PLAN – ACTION PLAN

Council adopted a Consultation and Communications Plan to assist undertaking the project and community consultation aspects required under the Guidelines for Boundary Change.

In regard to the community consultation phase the following excerpt is of the action plan section of the Consultation and Communication Plan provides an overview of the extensive work undertaken to ensure that the Community and Stakeholders were aware of the consultation and Council's Boundary Change Proposal.

August – October 2020	Your Voice All stakeholders	<ul style="list-style-type: none"> Your Voice Gawler (website consultation platform) consultation page published and linked to boundary reform webpage). Survey released online via Your Voice Gawler and available in hard copy at Council's Customer Service counters Submissions – submitted electronically via Your Voice Gawler and Email, or hardcopy via Post or in person at Council's Customer Service counters. 	Staff time and minimal printing only
August 2020	Local press: Bunyip Leader Herald	<ul style="list-style-type: none"> Advertisements Detail for inclusion in editorial if available Media release Boundary Reform Video Series <p>Communication of open forums and survey</p>	<p>\$1,000 per full page advertisement</p> <p>Mayor Redman and staff time</p>
August 2020 September 2020 October 2020	Website Social Media Murray St bin signs	<ul style="list-style-type: none"> Latest News post Update dedicated webpage Social media post Coreflute advertising survey on bins <p>Communication of open forums and survey. Multiple social media and latest news updates</p>	<p>Mayor Redman and staff time only</p> <p>Corflute cost \$1000</p>
September 2020 (distributed early September) - timing changed due to August	Rates Notice	<p>Brochure to include:</p> <ul style="list-style-type: none"> Council is preparing a General Proposal Areas being considered and why Details on Open Forums 	\$1,500

2020 Budget Adoption		<ul style="list-style-type: none"> • Survey link details 	
End September 2020	Community noticeboards	<ul style="list-style-type: none"> • Advertisement of Open forums and survey 	Internal resources to be used
–August - October 2020	Gawler Connected Community app	<ul style="list-style-type: none"> • Open Forum advertisement (Sept - Oct) • Survey link (Sept-Nov) 	Staff time only
–August to October 2020	Electronic Notice Boards	<ul style="list-style-type: none"> • Advertising Open Forums and survey 	Staff time only
–August – September 2020	Council networks	<ul style="list-style-type: none"> • Council Staff to distribute Open Forum invitation and survey link to networks (e.g. service clubs, community groups, sporting groups, etc) 	Staff time only
August/September 2020	Radio	<ul style="list-style-type: none"> • Mayor Redman to speak with Radio stations regarding boundary reform and upcoming consultation 	Mayor Redman and staff time only
August 2020	Targeted letters	<ul style="list-style-type: none"> • MPs • Subsidiaries • State Government agencies • Developers <p>Communication of boundary reform proposal, open forums and survey. Invitation to meet to discuss further.</p>	Staff time and postage
September 2020	Gawler Business Development Group and RDA Barossa	<ul style="list-style-type: none"> • Distribution of invitation to open forum to relevant businesses 	Staff time only
August – October 2020	All stakeholders	<p>Open forums in accordance with Resolution 2019:05:COU207. Will include discussion on:</p> <ul style="list-style-type: none"> • Overview of the boundary reform process • Why we are proposing boundary adjustments • Seek feedback on key issues <p>Open forums to be held as follows:</p> <p>Gawler</p>	Independent facilitator may be engaged for forums estimated \$5,000

		Proposed location (Gawler Civic Centre) Hillier, Reid & Evanston Park, Kalbeeba (inc. Springwood), Concordia, Bibaringa & Uleybury Proposed location Gawler Civic Centre – Due to Covid Social Distancing requirements	
November 2020	Website	<ul style="list-style-type: none">• Update dedicated webpage with Council agenda and minutes etc.• Latest news post	Staff time only

ATTACHMENT 4 BOUNDARY REFORM COMMUNITY CONSULTATION SURVEY

[To be attached]

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ATTACHMENT 5 WRITTEN SUBMISSIONS SUMMARY - CONSULTATION

[To be attached]

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ATTACHMENT 6 - CALENDAR OF EVENTS – SUPPORTIVE DOCUMENTATION

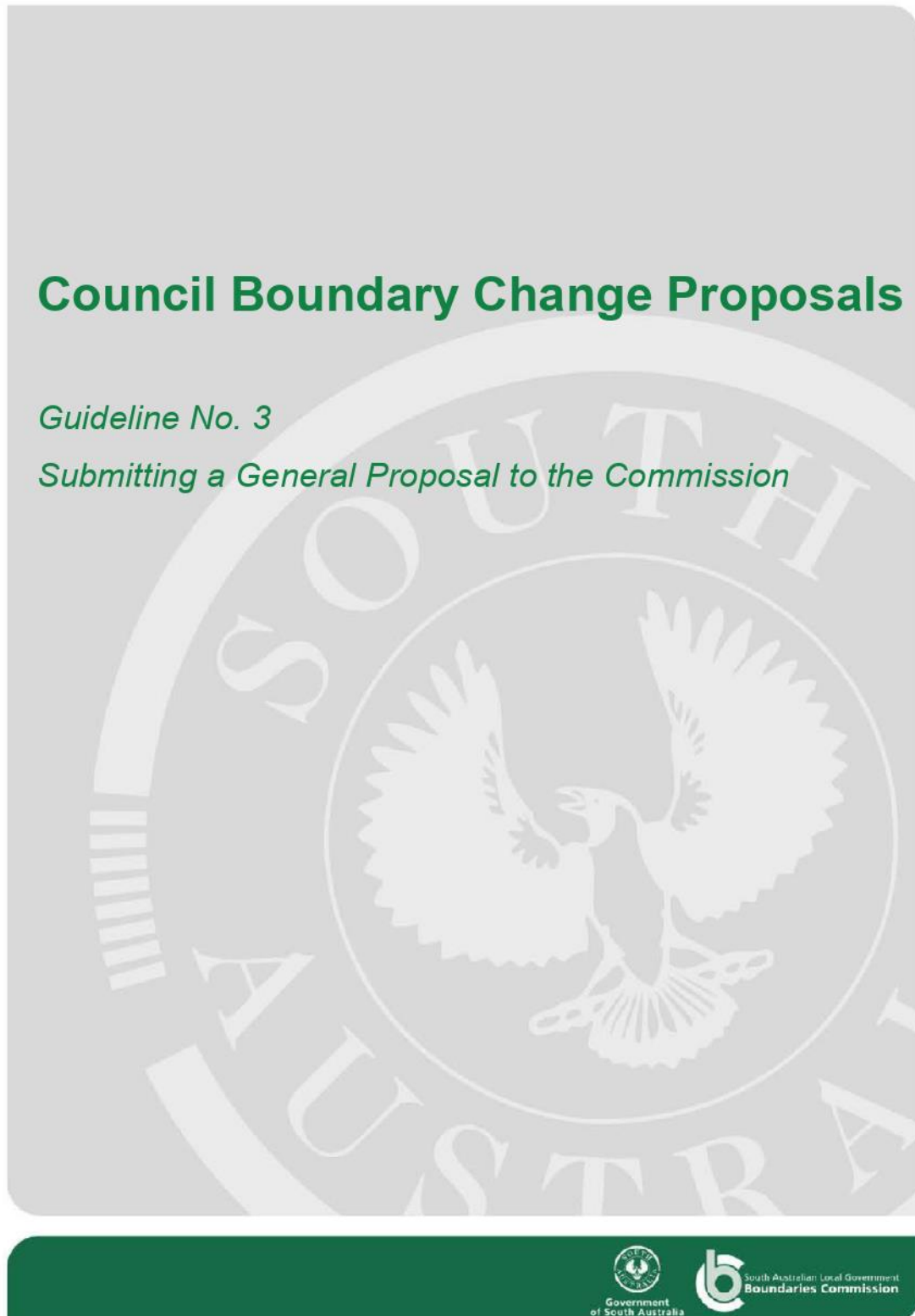
[To be attached]

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Council Boundary Change Proposals

Guideline No. 3

Submitting a General Proposal to the Commission



This Guideline should be read in conjunction with the procedures for boundary change proposals which are set out in Chapter 3, Part 2 of the *Local Government Act 1999* (the Act). The Act is accessible via the [South Australian Legislation website](#).

The Boundaries Commission (the Commission) is the body established to undertake the initial assessment of proposals, oversee investigations, and make recommendations to the Minister responsible for the Act (the Minister). This role is undertaken by the Local Government Grants Commission.

This Guideline has been issued by the Commission to provide information on general proposals, including the steps that need to be taken to prepare a submission. This Guideline specifies the requirements for council initiated proposals. Guideline 6 details the process for submissions initiated by members of the public who are eligible electors as defined in section 27(1) of the Act.

What is a general proposal?

A general proposal is a proposal that is not defined as an 'administrative proposal' within section 30(7) of the *Local Government Act 1999* (for example, general proposals may include a significant boundary change or amalgamation). Further information on administrative proposals is contained within Guideline 2.

Who can submit a general proposal?

Proposals may be referred to the Commission—

- by resolution of either House of Parliament;
- by the Minister;
- by a council or councils; or
- by the prescribed percentage or number of eligible electors.

Members of the public can submit a proposal to the Commission to consider boundary alterations, changes in the composition of a council or its representative structure, or the inclusion of unincorporated land into a council. Members of the public, cannot, however, initiate a council amalgamation or the creation of a new council. Further information on the process for public initiated submissions is contained within Guideline 6.

How to prepare a submission to the Commission

Proposals must set out in general terms the nature of the proposal and comply with the requirements of the proposal guidelines.

A single council, or councils in agreement with each other, may submit a boundary change proposal to the Commission.

When considering any boundary change proposal the Commission must refer to the objects of the Act as a whole, and in particular, the principles contained within section 26 of the Act (Attachment 1). Attachment 2 contains a more detailed discussion about the principles.

Prior to submitting a proposal to the Commission, councils should consider the principles contained in Attachment 1 and described in Attachment 2 and determine whether a submission for boundary change is the best way to proceed. Councils are encouraged to contact the Commission at this point to discuss the process.



The Commission requests councils to make a general proposal in two stages to enable the Commission to provide early feedback on a potential proposal. This will assist councils to determine at the outset whether a proposal is likely to proceed prior to undertaking extensive work on a potential proposal.

Stage 1 — Initial consideration of a potential proposal

Write to the Commission outlining the nature of the potential proposal and the reasons why the council(s) consider boundary change as the best option, including a brief outline of how the proposal addresses the section 26 principles, particularly in regard to the identified community of interest, social fabric and common interests of the area and how service provision would be improved as a result of the proposal.

At this point, the Commission will consider the correspondence and provide advice to the council(s), including whether a general proposal can be referred for consideration, if more work is recommended to be undertaken or further information is sought by the Commission.

Councils should note that advice from the Commission that a general proposal can be submitted does not guarantee that the proposal will be formally accepted.

Stage 2 — Referral of a general proposal to the commission

Prepare a submission to the Commission that sets out in detail the grounds on which the proposal is made and the issues that should be considered in an assessment of the change to boundaries. The Commission requires the matters listed below to be included in your proposal, noting that the Commission expects a proposal to cover these matters as far as the initiating council can be reasonably aware of them.

Given that the Commission is obliged to take the section 26 principles into consideration when making recommendations about boundary changes, initiating council(s) are required to detail how their proposal fits with these principles when referring a proposal.

Description of the proposal

- Provide a detailed description of the proposal
- Clearly identify all councils involved

Section 26 principles

- Describe the proposal with reference to the principles set out in section 26 of the Act and contained and described in Attachment 1 and 2.
- Prior to accepting a proposal, the Commission may request information from other affected councils in relation to their view of how the proposal will address the principles.

Community of interest

- Discuss various components (cultural, heritage, shopping, community services, road and other transport links, sporting, etc.) of the social fabric of the area which is the subject of the proposal. Identify common interests that would be likely to benefit from the proposal.

Council Boundary Change Proposals — Guideline No. 3

Version: 2 July 2020

- Identify any individual large community or business assets, or significant geographical features in the area of the proposal that you consider affect the community of interest.

Consultation

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 consideration (noting that it is the Commission's role to consult with all affected communities on the impact of all proposals that it investigates— refer Guideline 9).

Information provided when a general proposal is submitted must therefore include any details of the consultation a council has undertaken to form its view that it should submit a proposal. This may include:

- a list in sequence dates of key council decisions, announcements, notices, public and other meetings, actions by stakeholder groups, press articles etc.
- numbers of letters received supporting and opposing the proposal, details of public meetings held to discuss the proposal, and estimates of numbers attending. Provide copies of news articles, letters to the editor and public notices in newspapers.
- the degree of support shown for and against the submittal of the proposal , any concerns that were raised during the consultation, and how these have been addressed by the council

Advantages and Disadvantages

- Provide a balanced representation of the advantages and disadvantages of the proposal.
- Identify stakeholder groups, providing details of the interests and identity of each. Discuss impacts of the proposal on each group.
- Record any significant opposition known to the applicant council or councils and the basis of this.

Any other relevant information

- Information the council considers relevant for matters the Commission must consider under section 31(3)(b).

Administrative matters

- Maps should be supplied which depict in sufficient detail the area the subject of, and surrounding area of the proposal (where relevant).
- Name and contact details of the officer(s) of the proponent council(s) to whom the Commission should direct its questions and correspondence.



Council Boundary Change Proposals — Guideline No. 3

Version: 2 July 2020

This information will enable the Commission to make a decision whether to accept the referral. If accepted, the Commission will request further information as part of its investigation of the proposal. Further details are contained within Guideline 4.

What happens following a submission to the Commission?

The Commission will assess the proposal in accordance with the Act and the guidelines and determine whether to inquire into the proposal or refuse to inquire into the proposal.

The Commission may refuse to inquire into a proposal if the Commission considers that—

- The proposal is vexatious, frivolous or trivial; or
- If it is not in the public interest to inquire into the proposal; or
- The proposal is the same as or substantially similar to a proposal that has already been inquired into; or
- there is some other good reason to refuse to inquire into a proposal, for example, the issues raised in the inquiry were dealt with through a previous representation review in line with Section 12 of the Act.

The Commission may also decide to defer consideration of a proposal if it is of the view that the proposal cannot be finalised and gazetted by 31 December of the calendar year preceding a periodic council election.

The Commission may seek additional information to assist with its decision, and will directly notify the initiator of its decision.

The Act gives the Commission flexibility to deal with proposals to ensure that the most effective inquiry into an identified issue is undertaken. For example, the Commission may deal with similar or competing proposals that are referred to it.

If the Commission determines to inquire into a general proposal, section 31 of the Act sets out the process for these inquiries. Guideline 4 provides information on inquiries into general proposals, including how a submission is progressed by the Commission.

In line with the Commissions 'Publication Policy' the Commission will, upon receipt of all proposals, make the proposal publicly available on its website. **Contact Details:**

Boundaries Commission

GPO Box 2329 Adelaide SA 5001

Phone: (08) 7109 7145

Email: boundaries.commission@sa.gov.au

Website: www.dpti.sa.gov.au/local_govt/boundary_changes



ATTACHMENT 1**26—Principles**

(1) The Commission should have regard to—

- The objects of the Act
- The roles, functions and objectives of councils under this Act; and
- The following principles:
 - The resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community;
 - Proposed changes should, wherever practicable, benefit ratepayers;
 - A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently;
 - A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis;
 - 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;
 - A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes
 - 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
 - A council area should incorporate or promote an accessible centre (or centres) for local administration and services
 - 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
 - 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)
 - 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
- The extent and frequency of previous changes affecting the council or councils under this Chapter or the repealed Act.
- The Commission should, so far as is relevant, give preference to structural changes that enhance the capacity of local government to play a significant role in the future of an area or region from a strategic perspective.

ATTACHMENT 2

The principles guide the Commission in balancing various council and community interests. While general in nature, they address a range of considerations, including communities of interest, effective governance, operational capacity, delivery of services, effective planning and development, accessibility, and adequate and fair representation. Consideration will also be given to regional activities that may offer a viable and appropriate alternative to boundary change.

The principles emphasise the importance of ensuring that boundary changes enhance the capacity of local government within the area to continue to deliver results to local communities in a more strategic and effective way.

Below are some questions you may wish to consider when formulating a proposal—

- How will the proposal align resources to where they are most needed and provide value to ratepayers?
- How will the proposal increase the council's ability to improve operational capacity and financial sustainability?
- What impact will the proposal have on the resource base of affected councils?
- How will the proposal enhance the capacity of the council to deliver better services to the community?
- How does the proposal support communities of interest?
 - Similar interests are important for groups that have been represented together because of their close geography or social and economic interests. Factors contributing to a sense of community included shared interests and shared use of community facilities.
 - Is there a sense of belonging or stronger community connection with the area which can be clearly defined?
 - Identify common interests that would be likely to benefit from the proposal, such as economic, social, heritage, cultural and recreational.
 - Consider the functional relationships and whether the proposal meets the community's needs, for example, use of services, road and transport links, shopping etc.
- How will the proposal improve representation?
- Has consideration been given to delivering services on a regional basis as an alternative to boundary change?

Council Boundary Change Proposals

Guideline No. 4

Investigation of General Proposals Initiated by Councils



This Guideline should be read in conjunction with the procedures for boundary change proposals which are set out in Chapter 3, Part 2 of the *Local Government Act 1999* (the Act). The Act is accessible via the [South Australian Legislation website](#).

The Boundaries Commission (the Commission) is the body established to undertake the initial assessment of proposals, oversee investigations, and make recommendations to the Minister responsible for the Act (the Minister). This role is undertaken by the Local Government Grants Commission.

This Guideline has been issued by the Commission to provide information on the investigation of general proposals, including how a submission is considered and progressed by the Commission. This Guideline specifies the requirements for council initiated proposals. Guideline 6 details the process for submissions initiated by members of the public who are eligible electors.

Section 31 of the Act sets out the process for inquiries into general proposals. The Act provides for an independent analysis of major proposals by one or more investigators consisting of expertise that is determined to be necessary for each proposal.

The Commission can appoint one or more investigators to undertake a detailed inquiry into the proposal. However, the Commission must appoint investigators when a general proposal is referred to them by either the Minister or by resolution of either House of Parliament. Further information on the appointment of investigators is contained within Guideline 5.

When considering any boundary change proposal the Commission must refer to the objects of the Act as a whole, and in particular, the Principles contained within section 26 of the Act (Attachment 1). The Commission is obliged to take these principles into consideration when making recommendations on boundary changes.

In addition to these principles, an inquiry must consider the matters in section 31(3)(b)—

- The financial implications and impact on resources that the proposal is likely to have on any council affected by the general proposal; and
- The extent of support for the general proposal and boundary reform in the area within the community affected by the general proposal; and
- The extent of support for the general proposal of any council affected by the general proposal; and
- The impact of the various rights and interests of any council employees affected by the general proposal; and
- Any other principles prescribed by regulations.

Other matters an inquiry may consider include—

- Division of assets and liabilities – including land and buildings, plant and equipment, cash, investments, interests in and business activities, debtors, debt, overdraft, staff entitlements;
- Impact of any significant contracts;
- Ability of communities to access council services and relevant communication issues between councils and communities;



- Assessment of any significant differences in rating policies of the councils involved, the impacts on ratepayers and how these are to be addressed in both the short and longer term;
- Potential conflicts that may arise from existing patterns of land use if the proposal was implemented, for example, predominantly residential areas being aligned with intensive agricultural lands.
- Assessment of any significant differences in fees and charges of the councils involved;
- Material impact of legal orders and proceedings;
- Assessment of any significant differences in service levels provided by the councils involved; and
- Implications for council employees, including any proposed transfer of staff and conditions of employment.

Provision of Information

Section 32A of the Act provides powers for the Commission or an investigator to obtain information in connection with an inquiry. The Commission or its investigators may seek relevant information from affected councils to inform consideration of the above matters, including—

Statistical and social data

- Number of residents affected.
- Number of properties affected, separated into residential, primary production, commercial and industrial and compare these to the total number of properties in the area of the council(s).
- Social profile of the community—for example, age distribution, ethnicity, income levels, employment patterns.
- Social and economic history of the area.

Financial information

- Details of rate and grant revenues that will be affected by the proposal.
- Identify real property and other significant council assets affected by the proposal.

Council representation arrangements

- Explain how the proposal will impact on ward quotas (if any) and the representation available to residents, owners and occupiers of property.
- Give details of interim representation arrangements that are proposed in the short term, or as a transitional measure, and their suggested duration.
- Outline the arrangements proposed in relation to any changes to office holders or elected members. If proclamations will be required, the matters to be covered should be set out clearly.

As part of its assessment of a general proposal the Commission is required to consult widely with councils and the public. Guideline 9 details how the Commission and its investigators will undertake engagement and consultation on boundary change proposals. The Commission will design an engagement plan for each general proposal.



Finalisation of an Inquiry

At the conclusion of an inquiry, the Commission must prepare and publish on a website a report that includes the Commission's recommendations and provide a report to the Minister. If the Commission determines to recommend a general proposal, the proposal may involve such variations as the Commission thinks fit.

The Commission may include in a report recommendations relating to the delivery of services on a regional basis by councils as an alternative to boundary change, or any other recommendation the Commission considers appropriate.

The Commission may also include a recommendation that the Minister write to the Electoral Commission of South Australia (ECSA) if the acceptance of a recommendation would have an impact on representation in council ward areas.

The Minister may send the report back to the Commission for reconsideration in accordance with any suggestions by the Minister. However, if this does occur, the Commission must then publish an amended report and provide a copy of the amended report to the Minister. The Minister may then determine whether a proposal recommended by the Commission should proceed.

If the Minister determines that the proposal proceed, it will be forwarded to the Governor with a recommendation that a proclamation be made.

The Minister may, in the case of a general proposal referred to the Commission by a council that the Commission has recommended in the report not proceed—at the request of 1 or more councils, consult with the relevant councils about the matter. After consultation, if the Minister determines that it is appropriate to make a recommendation to the Governor in the circumstances of the particular case, forward the general proposal to the Governor with a recommendation that a proclamation be made.

If the Minister determines that a proposal not proceed, the Minister must prepare a report for both Houses of Parliament.

Following completion of an inquiry, the Commission must give public notice of the Minister's determination. The Commission must also notify the person or body who referred the proposal to the Commission, any council affected by the proposal, and any registered industrial association that represents the interests of employees of councils.

Contact Details:

Boundaries Commission

GPO Box 2329 Adelaide SA 5001

Phone: (08) 7109 7145

Email: boundaries.commission@sa.gov.au

Website: www.dpti.sa.gov.au/local_govt/boundary_changes



ATTACHMENT 1**26—Principles**

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 - 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;
 - A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes
 - 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
 - A council area should incorporate or promote an accessible centre (or centres) for local administration and services
 - 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
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 - 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
- The extent and frequency of previous changes affecting the council or councils under this Chapter or the repealed Act.
- The Commission should, so far as is relevant, give preference to structural changes that enhance the capacity of local government to play a significant role in the future of an area or region from a strategic perspective.

Council Boundary Change Proposals

Guideline No. 5

Appointment of Investigators for General Proposals



This Guideline should be read in conjunction with the procedures for boundary change proposals which are set out in Chapter 3, Part 2 of the *Local Government Act 1999* (the Act). The Act is accessible via the [South Australian Legislation website](#).

The Boundaries Commission (the Commission) is the body established to undertake the initial assessment of reform proposals, oversee investigations, and make recommendations to the Minister responsible for the Act (the Minister). This role is undertaken by the Local Government Grants Commission.

The Act provides for an independent analysis of major proposals by one or more investigators consisting of expertise that is determined to be necessary for each proposal. This Guideline has been issued by the Commission to provide information on the appointment of investigators for general proposals.

When will the Commission appoint investigators?

The Commission can appoint one or more investigators to undertake a detailed inquiry into a general proposal. However, the Commission must appoint investigators when a general proposal is referred to them by either the Minister or by resolution of either House of Parliament.

The Act provides appropriate flexibility in appointing investigators—more significant proposals will require a number of investigators, whereas relatively straightforward proposals may be completed ‘in house’ (for council initiated proposals), or may only require a single investigator.

How will the Commission appoint investigators?

The Commission must seek to ensure, as far as is reasonably practicable that the qualifications, knowledge expertise and experience of a particular investigator are relevant to each inquiry.

The Commission must also consult with affected councils when appointing the investigator(s).

To assist with this process, the Commission will maintain a register of potential investigators that will work within a defined fee structure.

What powers will investigators have?

Section 32A of the Act sets out the powers of the Commission or an investigator when conducting an inquiry. These powers enable information to be obtained that is determined to be relevant to an inquiry.

The Commission or an investigator conducting an inquiry may—

- a) by summons signed by the Commission or investigator (as the case requires), require a person's attendance; and
- b) require a person to answer, orally or in writing, questions to the best of his or her knowledge, information and belief; and
- c) require a person to verify an answer under paragraph (b) by declaration; and
- d) require a council or person to produce any relevant documents or other records; and

Council Boundary Change Proposals — Guideline No. 5

Version: 1 January 2019

- e) retain documents or other records produced under paragraph (d) for reasonable periods and make copies of them or their contents; and
- f) call for or receive submissions or representations.

Will the investigators be independent?

An investigator appointed to conduct an inquiry must comply with any directions or requirements of the Commission relating to the inquiry, and, at the conclusion of the inquiry, provide a report on the inquiry to the Commission

The Act ensures that investigators appointed by the Commission are not subject to Ministerial direction in relation to an inquiry or a recommendation or report.

Contact Details:

Boundaries Commission

GPO Box 2329 Adelaide SA 5001

Phone: (08) 7109 7145

Email: boundaries.commission@sa.gov.au

Website: www.dpti.sa.gov.au/local_govt/boundary_changes



2



ANNUAL REPORT 2019/20

***“Developing successful and sustainable businesses
through marketing, advice and connection to the
community”***

“Your success in business matters to us ”

Overview

The primary objective of the GBDG is to help our constituent business community compete in an increasingly difficult, ever changing and competitive market. This year has been the most difficult year that many of our businesses have ever faced and probably will be the worst they have ever experienced. However, there are many businesses in the region that have been the busiest they have ever been. The COVID-19 Pandemic has brought exciting highs and devastating lows not only to our region but globally.

GBDG is committed to improving the viability of current Gawler businesses, promoting the economic benefits of conducting business in Gawler to potential new businesses and assisting all current and intending business to grow through providing services tailored to meet the individual needs of each business.

In the current climate, GBDG, just like its member base, has had to pivot and redirect much of its focus to the impacts caused by the COVID-19 pandemic. As soon as the virus emerged in Australia we switched our focus to provide information and immediate assistance to Respond to the crisis.

Phase 1 Response

- providing business advisory assistance specifically tailored to suit the needs of each individual business
- engaging with all businesses to identify areas of concern and hardship
- providing guidance and ongoing coaching
- providing access to a vast range of online webinars, programs and workshops all built around surviving the impacts of COVID-19

Phase 2 Recovery

- helping business owners to accept what has happened and plan a way forward
- promoting Gawler as a place to conduct business and live
- growing the awareness of Gawler as a major shopping/business hub
- promoting the ease of access to the Gawler business districts for customers/clients
- whilst also creating synergies with the vision of the Town of Gawler
- providing more varied marketing opportunities for the businesses
- working with Town of Gawler to plan a rate relief program
- providing access to the Gawler App at no charge to our businesses

Phase 3 Future proofing and Growth

- the marketing strategies have changed dramatically looking more at the big picture and how we can help to build Gawler as a regional hot spot. The town for our regional communities to flock to for their every need
- enhancing sustainability of local businesses via business development opportunities, strategic planning and strong business practices
- increasing customer numbers and foot traffic in the region by promoting Gawler as the place to find everything you want/need
- a plan to continue to provide ongoing support

The GBDG practices a continuous improvement policy and with continual review of services provided, keeps abreast of current trends and promotes the benefits of innovative new ideas to its member base.

Our first message to businesses when COVID broke was: *"we are here to help"*

Our second message was: *"you are not alone"*

Our third message was:

"Dealing with the Greatest Business Crisis of Our Time"

It's the biggest crisis any business community has faced, in our lifetimes at least. So, it's ok to be worried – everyone is.

Your initial reactions are now in the past. The shock has hit, you reacted with disbelief, anger, a sense of numbness, helplessness, sorrow, perhaps all of the aforementioned. Any such response being understandable and requiring no justification.

Now comes the really difficult stage, a time where you must harness your emotions setting aside those which are non-productive. It is a time where you must focus your attention on things you are able to influence, however small they may be at the moment.

The crisis has hit, there's no changing what's happened. So, assess your options, create a plan, a way forward, gather support around you (don't even think about doing this alone), then set about implementing the plan.

The Gawler Business Development Group has access to advisors who can help you with a crisis management plan. The plan will be different for each business but will look something like this.

- *Assess the damage.*
- *Consider your realistic options.*
- *Gather people around you who can aid.*
- *What will your business look like on the other side?*
- *What resources do you have at your disposal (physical, financial, human) and how are these resources best allocated.*
- *What resources do you lack (in order to survive) and how can you obtain them.*
- *What resource do you lack for trading on the other side, and how can you obtain them.*
- *Think about your customers, how have their needs changed? What new habits have they learnt and what changes should you make to your business model to accommodate the changes?*
- *Thinking about your business model, was it perfect pre the crisis. Did your business generate enough profit? This is an ideal time to make changes to your strategy and management practices to build business profitability on the other side.*
- *Thinking about the other side, it will be better, but we will face a recession. What does this mean for your business, and how should you react? This needs to be part of the plan.*

Once your plan is in place, it is important to realise there will be times when the unhelpful emotions of anger, frustration, and helplessness are foremost to mind. Try not to make decisions at these times, you are likely to regret them later. These are the times to rely on the team you gather around you, friends, co-workers and advisors."



COVID-19 business assistance

THE Gawler Business Development Group is working hard to ensure it is providing local businesses with relevant information around the COVID-19 pandemic, plus providing crisis management services.

All services are free for the members. The team has been speaking with business owners to ascertain if they are still trading online or offline and where businesses have employees, providing them with referrals to specialist business advisers to assist with accessing government stimulus packages to retain those employees. Other vital advisory services include legal and accounting, leasing, marketing and how to get their business up and running in an online format, with numerous businesses having already taken advantage of these.

"We have a panel of business advisers with expertise in numerous fields ready to help your business to remain open or work towards surviving this pandemic and coming out the other end as a viable business," executive officer Caren Roughan said.

CORONAVIRUS

Several webinars have already been shared with the business community, with many more to follow soon.

"It is vital that in these uncertain times, that businesses are given the resources and assistance required to finally survive the economic and emotional impacts of COVID-19 and then to work on how to come out on the other side in a healthy position," Ms Roughan said.

There will be interactive live webinars on how to get your business online and making sales, others that discuss the importance of reaching out and speaking with others, sharing helpful tips and saving the broken many are feeling.

The webinars will be live and interactive so that you can ask all the questions you need to, but also recorded so that they can be viewed later if businesses cannot make the original sessions.

GBDG is happy to be able to offer to pay for 100 member businesses to be embedded to the

Town of Gawler's, Gawler Community App for a six-month period to help increase sales, orders, and bookings. More information can be accessed from Caren Roughan 0488 440 588 or caren@gawler.org.au.

Another offering for businesses is a fully funded program that covers the strategies and management principles that will help you survive the economic impact of COVID-19 and generate more profit and manage costs flow on the other side.

The full range of our services, assistance packages and COVID-19 information is available on the GBDG website (www.gawler.org.au) and the GBDG Facebook page, both of which are updated as soon as new information comes to light.

GBDG is keen to speak with all business types e.g. home based or mobile to speak about how we may be able to assist them.

A member is someone who is operating their business from a commercial premises in the Town of Gawler. Council area or someone who has paid a voluntary membership fee.

COVID-19 CRISIS MANAGEMENT SERVICES

FREE BUSINESS SURVIVAL ASSISTANCE

ALL GAWLER BUSINESS DEVELOPMENT GROUP MEMBERS HAVE ACCESS TO A PANEL OF BUSINESS SUPPORT PROVIDERS AT NO COST – CONTACT US NOW TO ORGANISE THE ASSISTANCE YOU REQUIRE.

Legal	Accounting	Leasing/Rent	Marketing
Business Remodelling	Human Resources	Stimulus Packages	Banking Loans
Websites	Social Media	Work Health Safety	Government Restrictions
Information Webinars	Business Development	Access to Gawler Community App*	Online Forums



"I am very proud of the work that the Board Members and team of Gawler Business Development Group are doing to assist fellow business owners to survive the COVID-19 Pandemic. The GBDG has a wide range of assistance to offer to businesses so please make contact with us."

Louise Drummond – Chair of the Gawler Business Development Group

WWW.GAWLER.ORG.AU

0488 440 588

*GBDG will pay for 100 member businesses to be embedded to the app for 6 months.



2019/20 Activities

This year started the same as most others, with plans for great things, new activities, new opportunities and planning was well underway for this years Business Conference.

The first quarter client statistics showed a stronger engagement with the business community and much interest from businesses for the planned development opportunities.

Sadly, due to COVID, everything was immediately cancelled, while the GBDG Board planned a way forward and subsequently redirected the majority of its funds to assisting businesses to survive the pandemic and plan for a stronger future.

Though we could not present forums, workshops, programs and advisory services in a face to face environment, it took no longer than an hour or so after initial restrictions were announced, for us to plan a series of virtual events. Our strong relationships with numerous governing bodies and business groups proved their worth with us being able to offer a very large range of services and opportunities to our local businesses.

GBDG Activities/workshops/webinars/events

GBDG has a schedule of business development and information sharing activities/events planned each month and some of those are planned and delivered in partnership with the Gawler Innovation Hub and/or RDA Barossa. The experience and skills of facilitators who are experts in their fields are used to deliver valuable information to the business owners, managers and staff in the Gawler region. (55 opportunities for businesses in 26 weeks)

Date	Event	# Attendees	Feedback / Average Rating
23 rd July 2019	IP Rights in a Digital World	9	Very Good
12 th Aug 2019	Networking Function	18	Excellent
27 th Aug 2019	Networking in partnership with RDA	37	Excellent
1 st Oct 2019	How to get the most out of Office 365 in partnership with RDA	11	Excellent
2 nd Oct 2019	Walker Place Redevelopment Meeting with business owners and Council	6	Very Good
15 th Oct 2019	How to survive in today's business world in partnership with RDA Barossa and Innovation Hub	12	
20 th Oct 2019	Networking event in partnership with RDA – Fundamentals of Market Research	35	Very Good
8 th Nov 2019	Business Women's Lunch – Tammy's Table	15	Excellent
10 th Dec 2019	Networking event in partnership with RDA	30	Very Good
November/December 2019	Christmas in Gawler - Christmas Card Trail and competition	12 businesses	Very Good
3 rd Feb 2020	SYOB Start Your Own Business	2	Excellent
4 th Feb 2020	Tammy's Table	9	Excellent
19 th Feb 2020	SAFCOM Forum	17	Very Good
25 th Feb 2020	Business Breakfast	10	Very Good
3 rd Mar 2020	Tammys Table Session 2	9	Excellent
26 th Mar 2020	COVID-19 Webinar	Business SA	
7 th Apr 2020	Tammy's Table Group 1	9	Excellent
7 th Apr 2020	Managing Your Mental Health Webinar	Business SA	
8 th Apr 2020	Profit Surge W/shop x 2	23	Very Good
9 th Apr 2020	COVID19 Q and A session with Milanese and Co Accountants		
2 nd Apr 2020	Profit Surge W/shop	73	Excellent
24 th Apr 2020	Profit Surge W/shop	73	
30 th Apr 2020	Profit Surge W/shop	73	
30 th Apr 2020	COVID19- The Myriad of Legal Issues for SME's.	15 RDA/GBDG	
1 st May 2020	Tax Support for Small Business	ATO	
5 th May 2020	Tammy's Table Group 1	9	Excellent
12 th May 2020	Profit Surge W/shops x 5	73	Very Good
2 nd Jun 2020	Tammy's Table Group 1	4	Excellent
2 nd Jun 2020	Tammy's Table Group 2	10	Excellent
11 th Jun 2020	Profit Surge W/shop x 2	73	Excellent
2 nd Jun 2020	Be a Xero Hero (And Get Your File in Shape for EOFY)	5	Excellent
16 th Jun 2020	Facebook Ads (yes they really can work) W/shop	11	Excellent
26 th Jun 2020	Small Business in SA: Opportunities & Challenges	Business SA	
30 th Jun 2020	Tammy's Table Group 1	5	Excellent
30 th Jun 2020	Tammy's Table Group 2	9	Excellent

In addition to the events presented by GDBG there was a range of webinars referred to our members for their benefit.

Adaptive 2020 Sales & Marketing Strategies to tackle Covid19 (Part 1) - Presented by the SA Small Business Commissioner

Cashflow in a Crisis - Bernadette O'Connor, Executive Director at Management Governance Australia

COVID-19 and Business - Presented by City of Unley, City of Prospect & State Government

Creating an Ecommerce Platform for Your Business - Business SA

Fail or Scale: Responding to the current crisis and future challenges - Presented by Stone and Chalk

Global in-market updates - Presented by the Department for Trade and Investment

Grants and Government Assistance - Nicholas Ng, Partner, Deloitte Private

How Exporters can Survive COVID-19 and then Prosper - Christelle Damiens, Managing Director, Exportia

How to keep the power in your super - Presented by Stone and Chalk

Making working from home, work for you- Presented by AIIA

Managing contractual obligations for food and beverage manufacturers - Presented by Food SA and Norman Waterhouse

Managing Employees for Improved Performance – RDA

Mental Health – Business SA

New ways to engage customers and make sales - Presented by the Polaris Centre

People and Culture Impacts of COVID-19 - Michael Mead, Head of Consulting and Legal Services, Ai Group

Scaling During Tumultuous Times Series: UK - Presented by FD Global Connections

Staying healthy and happy in lockdown - Presented by RMIT University

Survival of the Finance Fittest - \$130 billion of support, what's your cut? - Presented by Stone and Chalk

Tax Support for small business – ATO

The Future of Work: What happens after all this? - Presented by AIIA

Tips to manage your cashflow - Presented by the Polaris Centre

Unburdening Your Business Financially from COVID-19 – Business SA

Testimonials for GBDG Events/Activities

What a brilliant group, glad I found you

Cant wait for the new projects in 2020

Thanks for another great networking event

Strong support for the development of small business

"Tea Cups tasted like dishwashing detergent"

"Fantastic, motivating – great to meet more business owners in Gawler"

"Love the relaxed style. Lots of useful information"

"Just finished Tammy's Table via a Zoom call, it went really well."

"All in all – a very positive vibe and loads of advice and support for everyone."

"Love it – great space for business owners to share insights, experiences and network"

"I feel more confident."

"It was very convenient having it via zoom/teams. Great trainer she was very patient and could explain in a very understandable manner

"Was an excellent workshop, doing an example made it clearer and I feel confident when I do my next Facebook ad."

"Perhaps a fraction long, may have been able to condense into 1.5 hours"

"Very informative. Possible areas could have been in more details but was still a great webinar."

Business Coaching

The GBDG has an agreement with RDA Barossa to provide coaching and mentoring services to GBDG members via a coaching referral system. This is a value add to the RDA's B2B program which has limits on the accessibility to coaching for our members.

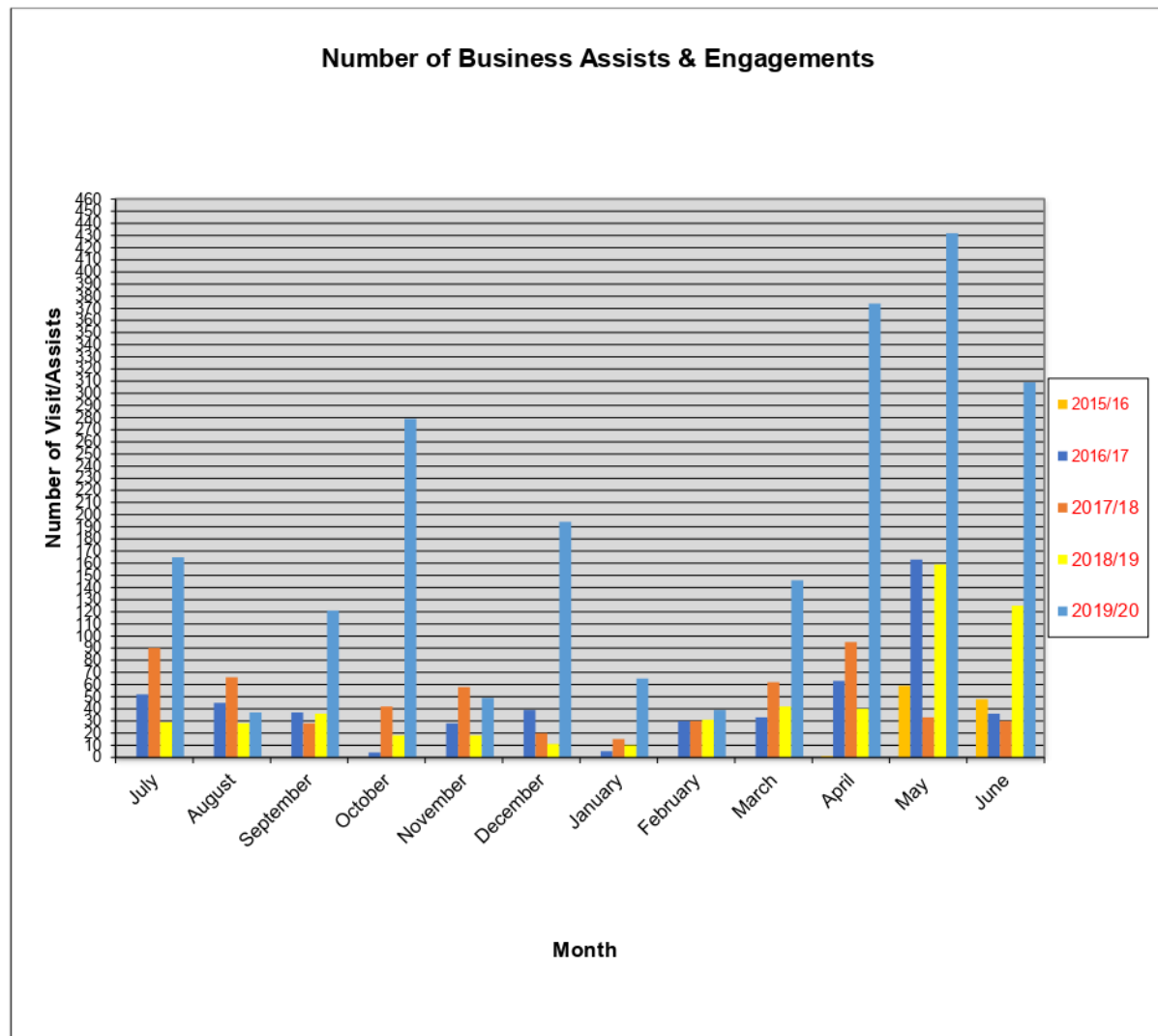
The GBDG has set aside funds in the budget to ensure that where a member requires ongoing coaching or support it can be provided at no cost GBDG also has a panel of experts in fields that the RDA B2B program does not include, and these experts are utilized to also provide coaching and business advice to our members.



Contacts Reports

The year from July 1 to June 30 saw a total of 2210 business assists/engagements.

A business assist is each contact with a business where the GBDG provide assistance, advice or information on any aspect of the business, operations, management, marketing, and attendance at forums, workshops etc and/or contact with a business where GBDG has contact with the business owner or staff to discuss any progress, potential issues, upcoming events or to identify areas of need.



Area of Assistance
Accounting Services
ATO
Building Regulator
Business Development
Business Plan Assistance
Business Review
Business Support
Cashflow
Financial Review
Funding Avenues, Loans and Banking
General Advice Legal
General Info
General Info LG
Governance
HR
Leasing / Landlords
Legal Services
Local Government
Marketing
Marketing Plan
Membership Enquiries
Mentoring for New Business
Networking
New Regulations
Other Referrals
Planning LG
Profitability
Record Keeping
Risk Management
Sales and Service
Social Media
Staff Development
State Government
Succession and Continuity
I.T Systems
Systems/Policies
Taxation/Superannuation
Technology
Website
RDA/Business Advisory Referrals

Business Movement

July

New Business Connections/Enquiries Aesthetic Bliss opened Mug Shot Coffee House (Todd St) The Wholesome Living Store (Willaston)	New Memberships/renewals Kevin Fischer
Business Updates Closed – The Edit Super Salon, Prices Bakery (retired and closed)	

August

New Business Connections/Enquiries Urban Luxe Hair and Beauty Ausure City and Rural (Insurance)	New Memberships/renewals Personal Touch Home Cleaning Eagle Foundry Back 2 Beauty Boss Plumbing Adflex VIP Home Cleaning Up-to-Date Consultancy The Church
Business Updates Moving – Adelaide Rd Dental moving from #12 to #24 Adelaide Rd, Play Therapy SA moved from sharing with Adelaide Rd Psychology, to on her own at 2 Main North Rd Gawler, Raine + Horne moved to 9 Adelaide Rd Closed – Micks Motorcycles gone into liquidation	

September

New Business Connections/Enquiries 0	New Memberships/renewals 0
Business Updates 0	

October

New Business Connections/Enquiries Bizzee Bean	New Memberships/renewals 0
Business Updates Closed - Gawler Aquariums, Mug Shot	

November

New Business Connections/Enquiries 0	New Memberships/renewals 0
Business Updates Closed - Dreamland Gawler , El Boutique	

December

New Business Connections/Enquiries 0	New Memberships/renewals 0
Business Updates Moved - Ezy Wash Laundromat moved to Adelaide Rd	

January

New Business Connections/Enquiries Adore Hair Body Beauty - Willaston	New Memberships/renewals Adore Hair Body Beauty - Willaston
Business Updates Jumping Jellybeans – moved from Gawler	

February

New Business Connections/Enquiries 0	New Memberships/renewals 0
Business Updates	

March

New Business Connections/Enquiries Specsavers Gawler	New Memberships/renewals Kin Lawyers Kat Cameron
Business Updates Start to Click now changed to ProsperITy Tech Solutions	

COVID IMPACTS

Towards the end of March and through April, May and June there was a marked increase in the number of businesses that felt the full impacts of the pandemic. Many businesses were forced to close their doors, some permanently and some temporarily during, and as a result of, COVID-19.

April

Business Updates

Closed Doors	Trading Offsite or Online	Still Trading onsite	Reduced Hours	Staff Let Go	Staff Sacked	New Services	Trade Increased	Requested Assistance	Gawler App	New Member/renewals
3	1	14	4	28	7	2	2	1	7	BNI

May

Closed Doors	Reduced Hours	Staff Let Go	Staff Sacked	New Services	Requested Assistance	Gawler App	New Member/renewals
19	68	250	50	20	20	13	

June

June was a very static month but the good news is that the rate of closures slowed to a stop as far as our sources could advise. This indicates that the businesses, though still struggling, had mostly reached the bottom of their decline and could now hopefully commence the climb back up.

New Business Connections/Enquiries 0	New Memberships/renewals 0
Business Updates 0	

Marketing

One of the continuing discussions amongst the Board of the GBDG has been “How do we increase the number of people who come to Gawler and spend money in our local businesses?” The answer is multi layered, we need to build awareness of Gawler and the businesses and this can be achieved by using numerous marketing approaches. We have used print media, Facebook, our website, the pavement slog, snail mail, television shows, television commercials and e-news in the past, and whilst each of these has proven to grow awareness there is little evidence to show repeat engagement with businesses.

The decision was made to engage an expert marketing company and after inviting 3 different agencies to deliver presentations to the Board showing what they could do for Gawler the Board engaged BIE Creative.

The strategy being used is to increase awareness of Gawler and the businesses operating here, increase engagement with GBDG via all platforms which will in turn create more awareness of what the area has to offer, and create a uniform “story” across all platforms.

The introduction of video interviews has proven to be very beneficial in building awareness, interest, and engagement by businesses and residents. This is demonstrated in the statistics below. Tweaks to the front page of the website have given a cleaner look with navigating the site improved, the e-newsletter will have a new template to again provide uniformity and continue the marketing “story”. This and more, will help to bring new repeat customers into our businesses.

A new raft of exciting business development opportunities have been prepared for 2020 so watch this space.

The last quarter of 2019 saw a drop in engagement with activities on the whole but a very large increase in engagement with our online platforms.

The GBDG’s new approach to multi layered marketing commenced in May after BIE Creative was engaged to complete projects to increase engagement with GBDG via all platforms which will in turn create more awareness of what the area has to offer, and create a uniform “story” across all platforms.

The new video interviews highlighting businesses and business owners has proven to be beneficial in building awareness, interest, and engagement by businesses and residents. These videos are quite informal and present the “human” face of business rather than us trying to “sell” the goods and services our businesses have to offer. The response has been excellent and though we had to go out and approach businesses to be showcased in this manner for the first 2 months, we then started to receive requests from business owners to “film me next”

Businesses have been asked if they cross promote other businesses in the region and it has been interesting to see some of the “partnering” of different business types. The benefits of cross promotion are currently being promoted to the business community.

The GBDG has engaged BIE Creative for a further 4 month period to continue building on the already successful marketing strategies to ensure a high level of interest, engagement and economic lift is maintained. This is deemed to be critical to the recovery of the region. There must be adequate levels of activity to continue to bring consumers to Gawler and GBDG is planning a number of events/activities to attract more “feet on the ground and dollars in the tills”.

Marketing platforms used during the period:

The Bunyip – print media	Linkedin – digital
The Leader – print media	Instagram – digital
Facebook – digital	GBDG website – digital
You Tube – digital	Television
Twitter – digital	Letterbox Drops
GBDG Newsletter	

Marketing Activities

Facebook

Date Range	Video Views	Post Reach	Post Engagement	Total Likes	Total Page Follows
Jul 2019	1325	7419	4756	2893	
Aug 2019	734	3264	3276	2894	2963
Sep 2019	2124	5822	4140	2897	2982
Oct 2019	959	8152	4199		
Nov 2019	1151	7995	3599		
Dec 2019	2141	8276	3610		
Jan 2020	550	2602	2759	2863	3062
Feb 2020	1525	5704	2324	2863	3062
Mar 2020	2415	8252	5342	2877	3082
Apr 2020	4019	6336	4595	2916	3155
May 2020	12,637	13,941	7473	2964	3220
Jun 2020	11830	13,162	4419	3014	3415

Twitter

Date Range	Tweet Impressions	Engagements	Tweets	Retweets	Profile Visits	Followers Changes	Mentions
Jan 2020	216	0	0	0	0	-1	0
Feb 2020	228	0	2	0	3	0	0
Mar 2020	275	0	4	0	0	0	0
Apr 2020	562	0	4	0	3	+2	3
May 2020	205	0	1	0	11	+1	0
Jun 2020	220	5	3	1	10	+2	0

Linkedin

Date Range	Followers	Following	Connections	Contacts
May 2020	996	1014	996	3629
Jun 2020	996	1015	996	3629

Instagram

Date Range	Posts	Followers	Following
May 2020	20	239	481
June 2020	30	286	426