

Enquiries: Sarah Gilmour  
Reference: ACC2024/XXXXX

<date> May 2024

Submission – Community Engagement Charter  
Department for Trade and Investment  
GPO Box 1815  
ADELAIDE SA 5000

Via email: [plansubmissions@sa.gov.au](mailto:plansubmissions@sa.gov.au)

Dear Mr Holden

### **Community Engagement Charter Update**

Thank you for the opportunity to provide input to the Community Engagement Charter Update (the Update). On 14 May 2024, the Council endorsed the following position on the Update.

In 2023, the Council submission to the Expert Panel on the Planning System Implementation Review sought changes to the Community Engagement Charter to mandate minimum timeframes for complex Code Amendments. Council maintains that further guidance is still required in this regard.

The City of Adelaide supports the intent of the Update to enable improved engagement outcomes and provides the following technical comments for your consideration in finalising amendments to the Community Engagement Charter:

- Support the recognition of more communities impacted by engagements.
- The City of Adelaide has identified the importance of engagement with First Nations people and considers that the Charter could provide more guidance on how this engagement occurs. The City of Adelaide encourages the State Government to consider including further detail on this in the Community Engagement Charter when undertaking the next review of the Charter including:
  - Listen deeply to First Nations people, particularly the voice and spirit of Country (the biological / biodiverse + the psychological + the social + the spiritual).
  - Take a First Nations first approach to development to minimise harm to Country.
  - A new practice of design through a First Nations lens, weaving stories and a sense of time together, a journey and understanding of the values and rights and ways of Country towards spatially mapping of place and space, which then influences the urban design.

- Request clarification regarding any proposed changes to the Toolkit and Guide to the Community Engagement Charter, particularly regarding minimum timeframes for engagement on Code Amendments.
- Seek clarification of the application of Part B – Minimum Mandatory Requirements, with respect to Heritage Code Amendments identified in a Regional Plan.
- Recommend extending the minimum mandatory timeframe for engagement of complying changes to three weeks, to align with development assessment engagement timeframes. Alternatively, a four-week minimum would align with other timeframes prescribed in the Charter.
- Seek clarification of when property owners need to be directly notified of a proposed Code Amendment under section 73(6)(d) of the *Planning, Development and Infrastructure Act, 2016*.
- Editorial amendments –
  - Delete the first paragraph under Part B – Minimum Mandatory Requirements as this text will be obsolete once Regional Plans are implemented.
  - Direct notification of complying changes should include owners and occupiers of land within the affected area and of adjacent land.
  - Proofreading for clarity of intent.
- Note the draft changes to Practice Direction 2—Preparation and Amendment of Designated Instruments.
- Seek clarification of whether Practice Direction 2 enables changes to Technical and Numeric Variations (TNV) and concept plans to form part of complying Code Amendments (noting these elements of the Planning and Design Code are not covered by section 75 of the Act).

The City of Adelaide acknowledges the importance of community engagement and welcomes the opportunity to clarify this submission and provide further feedback when the Charter is reviewed in the future.

For further information contact Sarah Gilmour, Associate Director, Park Lands, Policy and Sustainability at [s.gilmour@cityofadelaide.com.au](mailto:s.gilmour@cityofadelaide.com.au).

Kind regards

Michael Sedgman  
**Acting Chief Executive Officer**

