



## **RE: DRAFT ANNUAL BUSINESS PLAN 2021-22**

The Western Coastal Residents Association (WACRA), with over 300 members and supporters, are appreciative of the opportunity to provide feedback on the Draft Business Plan to the Charles Sturt Council (CSC). This is an important part of Council's expressed commitment to consultation and community engagement strategies using its current Public Consultation Policy.

We welcome your overall vision 'to provide for and respond to the needs of your community, valuing a strong and connected community.' We are in general agreement with your 5 theme areas with objectives and strategies:

OUR COMMUNITY - LIVEABILITY – ENVIRONMENT – ECONOMY - LEADERSHIP

### **GENERAL COMMENTS**

We are pleased to see that addressing the Climate Emergency is now listed as a *Key Strategic Issue*. However, we are concerned that the focus of action on the issue is mainly confined to achieving net zero carbon emissions from the activities of Council. While it is important that Council leads by example, there are also wider opportunities for influencing our social, economic and physical environment. We are disturbed that the main climate emergency strategy seems to rely on the tiny budget allocated to AdaptWest – \$65,000, or approximately .005% of expenditure.

We are particularly keen to see a stronger emphasis on radically improving tree canopy cover across the city. What is proposed is inadequate. We believe that the Plan fails to resolve the basic conflict of interest between increased infill development (and revenue to Council) and ensuring a green and sustainable environment. Because the implementation of the Planning and Design Code removes much of local government's role in planning the built environment, Council should rise to the challenge of taking a greater and much more assertive role in growing and developing green space.

We are concerned that much of the rhetoric and focus of the Business Plan is on growth rather than on quality of life. Growth in terms of population and of course of numbers of rate-able properties can work against improving the quality of life and sustainability of the environment for citizens. We feel it is important to be asking: when will we have grown enough? Is it possible, let alone desirable, in a defined geographic area with physical limits to land and water, to continue to grow indefinitely? We urge Council to put a greater emphasis on the *quality* of life and less on the *quantity* of growth.

The Plan states that the aim of Council budgets is 'one in which taxes (ie rates) paid by each generation is in proportion to the benefits that generation receives'. This is a fair statement, but one that fails to address the inequities of climate change for future generations. We continue to benefit from past (and ongoing) pillaging and destruction of our natural environment, unfairly

leaving future generations to pay the costs. All budgeting must change dramatically to correct past wrongs if we are to genuinely believe in this statement, and to start to address the many challenges ahead for our natural world. Making a more genuine budget commitment to improving Canopy Cover is probably the easiest, cheapest and most beneficial first step.

## **COMMENTS ON OUR COMMUNITY**

Objective: *Provide accessible social infrastructure and services that engage our diverse community*

- An important part of providing accessible social structures is the inclusion of supporting and enhancing creativity. The 'arts' seems to be a relatively small part of the strategy whereas there seems to be a heavier support for sporting groups throughout the business plan. WACRA has raised this issue in the past and we are pleased to acknowledge that there has been some improvement in this regard. (We particularly applaud the support given to Holden Street Theatres.) However, allocations for the arts appear to total around \$148,000. It is not clear in your draft document if CCS funds a designated staff person to develop the creative sector of small business and community endeavours. We recommend this be included as part of your strategy for 'diversifying service offerings to the community'. Arts initiatives, including in the digital, cross-platform areas, would strengthen your strategy for 'providing opportunities for formal and informal recreation and leisure experiences.' Over \$1.44 million, or approximately 11% of capital renewal, is to be spent on sport. Many in our community would welcome a more diversified arts and culture-oriented leisure and recreational experience for the community sector, possibly based in the new community hubs, as well as professional development assistance and co-ordination of opportunities for young people in entrepreneurial creative work across the West building for future work in emerging creative industries.

Objective: *Capitalise on partnerships, building community resilience and sense of belonging*

- The strategy 'Create opportunities for community leadership and civic partnership' appears to be at odds with Council's current Public Consultation Policy which confines consultation to the minimum mandated by the Local Government Act. It appears to disenfranchise the community as the Council will now only 'inform' us of consultations, not use the extended IAP2 LGA-endorsed concepts of 'consult, involve and collaborate'. The 'inform' level of consultation gives the community the role to 'listen'. It hardly fosters 'mutually beneficial partnerships'.
- We have appreciated the opportunity to meet regularly with senior CCS management. To capitalise on a 'sense of belonging, inclusion and social connectedness' as one of your strategies, regular quarterly meetings with more community groups would be helpful. We also respectfully suggest that a proactive approach for partnering could be the establishment of a residents' association reference group with the known residents' associations represented, where staff and councillors can interact openly and equally with stakeholders and the general community. Reference groups are a very useful tool with no power except to provide input.
- The Kaurua heritage and culture strategy are your commitment to traditional owners to protect locations of significance. There is a future opportunity for significant Reconciliation Projects at Breakout Creek, the Tennyson Dunes Conservation Park and at Coast Park as well as highlighting environmental values. Visitors and tourists can appreciate Kaurua history and culture, early European settlement (Estcourt House and Charles Sturt's home) as well as the special geology, unique flora and fauna, etc. An interpretive centre and/or trail could bring all these stories together as unique tourism/visitor journeys of the two

cultures who have been custodians of this place.

- WACRA also advocates forming an indigenous reference group that would work with Council on issues of mutual opportunity, including greening of the City for climate change abatement but also promotion of cultural and economic potential within the west by the large numbers of indigenous people who live in our City.

## COMMENTS ON OUR LIVEABILITY

Objective: *An urban environment that is adaptive to a diverse and growing City*

- This year data was released to show that more trees were removed through private infill developments in the CSS than in any other Council area. This is of great concern to us as a residents' association that values any measure to proactively abate climate change consequences. It may be State Government policy to have denser housing but if Council is to match its rhetoric about planning for a greener future then Council planners and elected members must make a stand on the removal of so much existing green foliage.
- We support the practical outcomes set out in the Green Adelaide Draft Plan and look forward to CCS working with the community to achieve these.
- We are very concerned that the indicators for achieving a 'well designed urban environment that is adaptive to a diverse and growing city' focus on quantitative growth rather than quality of life and equity. Measuring success in terms of increased population and increased numbers of new dwellings fails to address these questions. We would prefer to see indicators such as a reduction in the number of homeless people, a reduction in mental illness and a reduction in instances of domestic violence.
- We are concerned that there is no mention of the lack of social housing and the fact that some public housing stock in Charles Sturt is empty and has fallen into disrepair. Council should be joining with Port Adelaide and West Torrens Councils in advocating to state and commonwealth governments on this issue.
- We support the proposed maintenance plans and budgets for maintaining city assets and infrastructure.
- We also support the CX strategy for ensuring citizens interacting with Council get prompt and appropriate attention and response.
- The strategy for developing 'destinations that cultivate art, culture, place making and recognise heritage principles' requires expertise which may be beyond staff resources. How will council engage the community, including the Kurna people, to achieve this? Where will the funding come from? The employment of an Arts and Cultural Development Officer should be considered, given your strategic emphasis on enhancing culture and community pride. Perhaps the External Events Funding could be included as part of this position.
- Your strategy for continuing to improve our transport network, walking paths, and road safety is valued. The continued commitment to creating Disability Discrimination Act (DDA) accessible kerb ramps and bus stops in the budget could be mentioned in this strategy as an important component for making our community more inclusive and accessible. However, please note our specific concerns below in relation to cycle and walking paths.
- Responding to climate change could also be stated as a strategy in the objective for 'Enhancing the quality and diversity of open and public spaces.'
- Council is to be commended for its ongoing work on optimising the wider use of council-owned sporting facilities.

## COMMENTS ON OUR ENVIRONMENT

Objective: *Continue to implement climate change mitigation and adaption solutions*

- WACRA is fully supportive of all initiatives stemmed at making Charles Sturt an environmentally responsible and sustainable city, in particular the ongoing work to promote sustainable business practices, including the energy saving initiatives at Council head office which flow back to the community, the LED street lighting conversions and new infrastructure such as the recycled water mains extension, to create more efficient water use. We also are very interested in the stormwater 'raingardens' project and are unsure if this pilot has progressed?
- We support CCS taking back control of the community/recyclables through construction and operation of your MRF jointly with the City of Port Adelaide Enfield. There may be further opportunities to kickstart entrepreneurial businesses in the waste/climate change space? This is an area where you could lead from strength and perhaps create an environment where start-up businesses could gain expertise, export their knowledge and products and help create new jobs.

Objective: *Enhance the state of the City's environment and biodiversity*

- WACRA advocates that an enhanced budget for urban tree canopy be developed, both as a response to heat and climate stress but also to improve the image and amenity of the west as a 'leafy suburb' area. The use of advanced trees that will form shade canopies is preferred. More details on this below.

Objective: *Lead and educate to reduce the City's impact on the environment and build resilience*

- WACRA supports the continuation of free 'green waste bags' as a small but significant waste reduction strategy which requires public promotion to get full value from this service to maximise the potential of green bins and reduce food waste in blue bins. WACRA also supports the introduction of a trial of weekly green bin collection in a ward with current high volume green bin collections.
- WACRA previously welcomed the introduction of the solar powered smart bin at Henley Square in its pilot stage and looks forward to hearing if the project will be developed further in the city.

## COMMENTS ON OUR ECONOMY

Objective: *Lead regional collaboration to promote the Western Adelaide economy*

- As an important planning tool over time, council expenditure could be aggregated into Council ward areas and this be reported against each ward's SEIFA measure of socio-economic status. This would enable a benchmark for addressing and reporting on social inequity across the City by ensuring the most disadvantaged areas receive preferential resourcing.
- Given Council's highly proposed expenditure on IT and new databases, will the Council have improved business analytic data on types of business activity and resources in the CCS? This is basic land management information but could also be a valuable database to connect the community with economic potential. It would enhance partnering and other collaborative activities if businesses could connect through a Council database. This could help build ties with start-ups and entrepreneurs.
- How is tourism investment going to be maximised and measured? Program evaluation using independent university academics and researchers is essential to develop programs that are effective and efficient.

## COMMENTS ON OUR LEADERSHIP

Objective: *Practice transparent and accountable governance*

- We have already voiced our concerns about the limited Public Consultation Policy, but do believe it will be hard to deliver 'exceptional customer service' without the checks and balances of citizens being genuinely engaged and valued as the new approach seems to suggest.
- Your strategy 'Actively and effectively communicate council decisions' begs the question: to whom? Staff, councillors and ratepayers?
- To ensure 'robust strategies and systems underpinning decision making' requires staff that are trained to follow mandatory policy procedures, not just values, as has previously been recommended by Justice Blue. As this was a major finding of the Supreme Court case which the Council lost, it would seem that an appropriate response could be: 'Training is provided to all staff and elected members in following policy procedures.'

## SPECIFIC COMMENTS

WACRA supports the modelled scenario of rate growth so that you can continue to provide a comprehensive range of services to your citizens. We commend the Council on the 1.4% limited rise for 2021/2022 and support potential forecasted rises.

On the whole, we also support the individual projects listed in the Annual Operating Projects spreadsheet. We have a few questions however.

### West Beach Rockwall

In terms of capital projects with great potential to impact on the environment, our members question how much capital works funding is needed to restore the West Beach Rockwall and Coast Park path at cost to ratepayers. It is our understanding that the southern section reconstruction will be funded in the future by the State Government. What will be the cost to ratepayers? We are unclear as to the full costs of Stage 3. It appears that Council has budgeted for the total cost of restoration. What is the State Government's financial commitment given that a previous Liberal government approved the West Beach boat harbour that has since escalated and compounded the coastal problems?

### West Beach Surf Lifesaving Club premises

WACRA has previously submitted a response to the Community Land Management Plan to CCS. We understand that the Club members have decided that the Club will stay on its present site. WACRA is concerned that sea level rise, storm events and continual erosion may make this untenable within the next two decades. Your proposed contribution to the rebuild is \$1.6m. If climate change makes the building prematurely unusable then ratepayers will carry the cost. We recommend that an environmental impact study should be conducted prior to any future council expenditure, and a management plan developed in accordance with the study findings. Risk management is the key issue here. (Please refer to WACRA Submission re: Community Land Management Plan Coastal Reserve West Beach.)

### Communications Adviser

We see no evidence to support this proposal. Our major issue here is that we cannot see what purpose this position would serve in terms of outcomes for ratepayers. It may be effective in promoting the image of CCS compared to other councils which, in turn, may be advantageous for staff when seeking other positions. However, ratepayers do not choose between councils. We do not choose our local government provider. It provides no benefit to us. What we do like to see is

efficient use in providing the services we need, not \$100K+ spent on polishing the brand image of CCS. This should *not* be funded. There are already adequate resources for communications. These should be spent on listening as well as telling. For example, *Kaleidoscope* should include ratepayers' letters and perhaps a regular forum for community groups. Communication is about dialogue, not monologue, and elected members should have the frontline role in communicating with their communities.

### **Is there life after the new Planning and Development Code?**

The SA P&D Code is now in effect. This will radically alter and significantly diminish the role Council and staff have in the process for urban planning the City. We see no reflection of this change in the Draft Business Plan. What are the implications for Council's planning function, for staffing and for effectively ensuring coherent urban planning in accord with Council's 5 key strategic principles? What functions will have to change? What structural changes in organisational structure are anticipated? We see no evidence that this is being considered.

### **Henley Library /Community Hub**

We understand that following the failure of CCS to obtain matching state government funding for the proposed redevelopment, this project has lapsed. There seems to be no mention in the Business Plan, yet we note building works are going on. The community should be informed as to current developments, including any negotiations with the state government on the project.

### **Tree canopy**

CCS is one of the worst council areas in Australia for canopy cover, and one with the most opportunities to address the issue. The CCS Strategic Plan has an action for the Tree Canopy Improvement Strategy to be active and implemented by 2019. It is still to be presented to Council. Why is there such a long delay to this document that we hope will help action much needed changes to current Council strategies around tree retention and tree planting? It is likely the outdated data which has canopy cover at around 14% is now even lower. Targets of around 30% are considered necessary for healthy, climate-resilient communities. Other initiatives such as the State Government's push for Adelaide to become National Park City will hopefully see more pressure put on councils such as CCS that have extremely low canopy percentages. This surely adds to the imperative for CCS to make canopy reinstatement a priority.

WACRA did two deputations on this issue in January 2021 in the hope we would see genuine budget commitments around increasing canopy. While we are pleased to see some small increase in the total street planting budget, and a few dollars here and there for community projects, **the overall amount allocated to environmental initiatives in no way demonstrates your commitment to the recently declared climate emergency at only around 0.7% of the total budget**, once the \$1 million for Breakout Creek, which has been in planning for some years, has been removed. Further refining to initiatives that have a planting focus, and the percentage is more like **0.3%, or only \$2.65 per resident. We are sure many residents would be both surprised and upset at this lack of commitment.**

The Plan states that you will know you have succeeded if 'Our tree canopy cover (city, public and private land) increases annually and is greater than 16% by 2025', a far cry from '20% by 2020' – which is still low by most measures. A 30% goal is where we need to be, but **at least let's aim for the original 20% which is achievable with the right education, incentives and a much higher budget allocated to planting, irrigation and maintenance.**

To put the current draft budget into context:

- Environmental initiatives for both operating and investing projects are only around 3.6% of the total project budget of \$ 49.5 million. This includes \$1 million for Breakout Creek that has been planned for many years.
- Projects that actually involve tree planting are only an additional \$200K for whole street tree planting, and around \$100K for some community greening projects. While these are great to see, it is not going to fix our canopy losses!
- The increase in rates revenue alone is expected to be \$4 million (from \$110 million in 2020-21 to \$114 million in 2021-22.) A decent portion (well over \$1 million) comes from rates windfall through development and subdivision, which has devastating impacts to canopy.
- Expenditure relating to environmental management is only around 50c for every \$100 the council spends. \$166K has been allocated to a Street Tree Prioritiser and Tree Canopy Target Planner. While this is good to see, it is still very surprising that CCS still needs to do this given Council has been talking about trying to fix canopy destruction for many years. Why are we still in planning and report mode?

### **Cycle paths**

The Liveability Organisational Plan actions include investing in inclusive upgrades to the whole transport network to promote a balanced distribution of residents driving, walking, cycling and using public transport. An expected outcome is an annual increase in the community using active transport including cycling. Yet the reality is that cycling in CCS is often difficult and dangerous. Twenty five cyclists have died on SA roads in the last 5 years, most in the metropolitan area, with one tragic instance on Seaview Road on New Years Day. The total spend on investing in inclusive upgrades for cycle paths is \$30K for one link path at Coglein Street, plus the possibility of grants for businesses to put in cycle racks. While there is no single figure in the Draft Business Plan for expenditure on roads, adding up the various road projects comes to in excess of \$20M. \$30k for cycle paths compared to \$20M for roads does not appear to be a balanced distribution. It is time for Council to show a real commitment to supporting the growth of *safe* cycling.

### **Walking Path: Don Ferguson Memorial Reserve to Atkin Street Henley Beach**

We understood that CCS was committed to extending the walking path that currently ends at the Don Ferguson Memorial Reserve at Marlborough Street to run south along the strip park between Wright and Chambers Streets across North Street, past the Henley Community Garden and to link up with the path that runs alongside Atkin Street and then east on to Griffiths Street. We are very disappointed that this project does not appear in the Draft Plan. The current path is well used by the community and has enhanced the environmental and social quality of the neighbourhood. We cannot understand why it appears to have dropped off the agenda.

### **Salaries costs**

We note that CCS spends \$16 per \$100 of total budget on 'corporate services'. PAE spends \$9.67 (20-21) on 'business undertakings'. We acknowledge that it is difficult to compare given that different councils use different classifications. However, it would be reassuring to ratepayers to know that CCS is efficient and effective when it comes to salary expenditure. We would find it useful to have a comparison with other councils on salary costs per resident and especially on the ratio of staff on >\$100pa per 10,000 residents.

### **Shade for Henley Square**

We note and applaud the recommendation for \$150,00 for the installation of shade in Henley Square. This is an issue we have been vocal on since the planning stages. We also note that although it was not presented as an option to people responding to the Your Say on the issue, many echoed WACRA's call for mature trees to be part of a shading plan. We stand with them. We reaffirm our offer to Council to assist in a tree planting day in Henley Square. WACRA strongly opposes any plans or recommendations to allow closing off sections of the beach and charging people for shade canopies (as happens with the 'Mosely Club' at Glenelg).

### **Coast Park**

While the state government has taken over the responsibility and the budget for the CCS section of the Coast Park pathway, we understand that ongoing maintenance will be a Council responsibility. Has this been budgeted for? Council will also be responsible for ensuring safety on the path. We believe that Council, possibly via the LGA, should be negotiating with state government to enable legislation to place speed limits on bicycle paths.

### **PUBLIC CONSULTATION PROCESS ON THE DRAFT BUSINESS PLAN**

After going through the process of providing feedback on the Draft Plan we have a few observations on the process and how Council could encourage stronger and more productive community engagement in the Plan's development:

- Change the name! Asking the general public to provide a response to the *Draft Business Plan* is about as enticing as being invited to audit the stationery cupboard. Perhaps the existing communications staff could come up with a catchier title. Maybe *What Council plans for your community*, or *How we plan to spend your rates in 2021-2022*.
- The document itself is opaque in many ways. It goes from the high principles to the minutiae of budget bids with little context in between. It is difficult to aggregate various types of expenditure such as sport, the arts, tree planting etc. An indication of how much is spent across the various wards would also be useful.
- Comparisons help people assess value. It would be useful to be able to make comparisons between councils. We understand that the SA Local Government Grants Commission has standard classifications for expenditure categories which should make this possible. We could not determine if these are being followed.
- Comparisons over time are also very helpful. For example, how does spending on each category for the coming year compare to last year and previous years? Without this data, it is very difficult to know whether we are trending in the right directions.
- It would be very helpful if the Draft Plan could include a section on *How to respond* including an email address for submissions, a link to Your Say and key details like the closing date.

## **CONCLUSION**

WACRA appreciates that the CCS runs a very complex large organisation which delivers an enormous amount of value to residents. The proposed annual budget plan continues a tradition of strong management, planning and evaluation. We regret the short timeframe for this consultation, including an information night *after* the Council deputation process. WACRA would be happy to be part of any further subcommittee or reference groups considering the Final Annual Business Plan 2021/22 and to meet with Council senior staff if that would be helpful.

*Paul Laris, WACRA President*