



# Greenwich Community Association Inc

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For current committee contact details see [www.greenwich.org.au](http://www.greenwich.org.au)

13 November 2019

The General Manager  
Lane Cove Council  
PO Box 20  
LANE COVE NSW 1595

Dear Sir

## **Draft Community Participation Plan**

The Greenwich Community Association (GCA) makes the following submission in respect of the draft Community Participation Plan (PP).

- 1. *The PP is a statement of aspirations, not a plan.  
The document requires inclusion of significant detail to ensure delivery of its stated aspirations.***

The stated purpose of the PP is “to outline **how the community can participate in the planning system** and the principles that Council will follow in undertaking community engagement ....”.

The PP is a statement of principles but there is no detail as to **how** the community can participate.

- 2. *The PP cannot be fully understood without inclusion of the documents referenced in it.***

The PP includes limited detail as to conduct of the community submission process. It references both Council’s Community Engagement Policy (CEP) and Council’s “Submissions Guidelines”.

These documents should be included in the body of the PP or as annexures.

- 3. *The PP limits the scope of Council’s CEP.***

Council’s CEP is a comprehensive statement of the principles and processes Council is required to follow in its community engagement.

The PP significantly erodes the scope of the CEP and, on the principle that the specific overrides the general, the effect of the PP is to severely constrain the right of the community

to participate meaningfully in Council planning processes.

If it not intended that this be the case, the PP should be re-worked to incorporate the principles and processes outlined in Council's CEP.

**4. The PP does not address the key concerns of the community in relation to Council's current conduct of community engagement in planning decisions.**

These concerns are as follows:-

**4.1 Limited and ineffective notification to the community of planning related initiatives/ applications/proposals (proposals)**

Council's current communication strategy is ineffective in reaching many who would like the opportunity to make submissions on key proposals.

We note, in particular, the following:-

- use of mail services to notify community members of DAs is slow and often leaves the community with far less time than the required 14 days to make submissions
- the email broadcasts often used by Council to notify of key proposals does not reach those who have not subscribed to Council's email service
- Council relies on community groups with limited resources to advise community members of proposals with short submission time frames
- The use of the North Shore Times to communicate key messages is ineffective, given its limited letterbox distribution.

**4.2 Council's website is difficult to negotiate and often fails to reflect the status of a proposal. This makes it difficult for community members to make informed comment in submissions**

The PP talks of making "available relevant documents that **may include** a draft of the policy, plan or proposed development".

The community should be able to view **all** documents integral to a proposal – it is only when this happens that the community will be able to give informed comment.

It is often almost impossible to track the detail and progress of a key proposal on Council's website, 266 Longueville Road being a notable recent example.

It is disappointing to note that upgrading and ongoing website maintenance was not adopted as the primary and urgent core objective of Council's Customer Experience Strategy.

**4.3 Failure to upload to Council website copies of all submissions lodged in response to proposals diminishes confidence that Council staff make recommendations to Councillors in the public interest.**

It is important for the community to be assured that there is full transparency around Council's decision making in respect of proposals before it.

For this reason, all submissions made to Council in response to proposals should be

uploaded to Council's website, as is done by the Department of Planning, Industry and Environment. Appropriate privacy notices can address any community concern around identity protection/privacy concerns.

#### **4.4 Post consultation feedback and reporting is inadequate.**

Community members often spend significant amounts of time in preparation of considered and full submissions. It is disappointing that Council reports do not adequately address all issues raised in submissions and fail to provide detailed explanations for recommendations made to Councillors. This often leads to a perception that Council staff pay little regard to submissions made.

Confidence in the decision making process would be enhanced by:-

- individual feedback to community members on issues raised in their submissions
- fuller detail in reports to Council of issues raised/numbers of issues etc in submissions
- more explanation in reports to Council of reasons that officers have not adopted suggestions of community members.

#### **5. Council's website should reflect accurate and current detail of planning processes.**

The planning assessment landscape is complex, with delegation to Council officers of consent powers to \$30 million, referral to external bodies for DAs in excess of the \$30 million cap and referral criteria to the LCLPP.

Council's website does not include detail to explain these complex assessment processes.

Furthermore, it does not include in its section on the LCLPP the recently added referral criteria relating to