



6 December 2018

Ms Alison Frame  
Deputy Secretary Policy and Communications  
Department of Planning and Environment  
GPO Box 39  
Sydney  
NSW 2001

Dear Ms Frame

**RE: Exhibition Draft Community Participation Plan**

Thank you for the opportunity to comment on the draft Community Participation Plan, which sets out the Department of Planning and Environment's approach to community engagement and how it will engage with the community in the preparation of planning policies and plans. This submission has been prepared by Council staff, but has not yet been reviewed or endorsed by the elected Council. Councillor will be consulted and a revised submission will be made if required.

The Draft CPP clearly articulates the intent of the Community Participation Plan, as well as who and to which functions it applies (section 1.1 and 1.2). It also clearly identifies and provides examples how the Department will act to meet to the community participation objectives set out in Section 2.23(2) of the Environmental Planning and Assessment Act (Section 2.2).

It is noted that the Department's approach to engagement encompasses Inform, Consult and Engage. These approaches are noted to be at the mid to lower end of impact on decision-making and does not include collaboration with those communities affected by policies and plans. Actions which Inform, Consult and Engage may be appropriate in the preparation of draft legislation, regulation, policies and guidelines. Approaches and actions which include Collaboration, defined as 'partnering with the community in decision-making including the development of alternatives and the identification of the preferred solution' are appropriate in the preparation of plans for urban renewal areas. It is requested that the Department commit to this in its Community Participation Plan in order to successfully 'plan places for people'.

Exhibitions are the most common way that the Department seeks feedback on a wide variety of legislation, plans, policies and guidelines. The mandatory statutory exhibition time periods identified in Tables 4 and 5 and the non-mandatory exhibition timeframes in Table 6 do not allow a submission to be prepared and endorsed by council within the identified exhibition period. In addition, the wording of the draft Community Participation Plan leaves 'wiggle room' for the Department to reduce the exhibition period in a wide range of situations. Given the importance of many of the Department's plans and policies to the community and the potential impact on the built environment, it is important that council, representing local community interest, be able to provide informed comment on proposals and draft plans and policies. It is requested that the Department consider lengthening the proposed exhibition timeframes by an additional 14 days to facilitate the ability of the elected council to have input into submissions.

All planning authorities are required to prepare a Community Participation Plan by 1 December 2019. The Department is to be commended on preparing its Community Participation Plan early, and so providing a template that can be followed and customised by other planning authorities. The template can be improved through inclusion of the changes requested above. This would signal other planning authorities to commit to meaningful engagement with communities in planning for 'places for people'.

If you have any questions regarding this submission, please contact Margaret Paige on 9710 0169.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Carlon', with a long horizontal line extending to the right.

Mark Carlon  
Manager Strategic Planning