

6 December 2018

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir / Madam,

**Canterbury–Bankstown Council Submission –
Draft Community Participation Plan**

Thank you for the opportunity to comment on the Department of Planning & Environment's Draft Community Participation Plan (CPP).

Following a review, Council raises the following issues:

Issue 1: The Draft Community Participation Plan should detail how the Department will inform, consult and engage with people from culturally and linguistically diverse backgrounds

The Greater Sydney Region Plan contains objectives and strategies relevant to the preparation of CPPs, namely Strategy 8.1 to incorporate cultural and linguistic diversity in strategic planning and engagement.

The Department should revise the CPP to be consistent with the Greater Sydney Region Plan.

In particular, Table 3 of the CPP should detail the types of actions that the Department will undertake to inform, consult and engage with people from culturally and linguistically diverse backgrounds.

Table 3 should also detail the types of actions that would apply to other groups who may find it difficult to participate in standard engagement activities, such as young and older people, people with disabilities and Aboriginal and Torres Strait Islander people.

Issue 2: The Draft Community Participation Plan should review the exhibition timeframes for state significant applications

From experience, the minimum 28 day exhibition period is found to be insufficient to enable Council and the community to comment on state significant development and infrastructure applications.

For example, the state significant infrastructure application for the Sydenham to Bankstown Metro Line involved a study area up to 13km long and was based on an EIS containing around 5,000 pages in multiple volumes. It is unreasonable to expect the community to review this volume of information in 28 days.

If there is a 28 day exhibition period required for local scale applications, it follows that state significant applications should be exhibited for a longer period due to the higher impacts.

Issue 3: The Draft Community Participation Plan should provide an exhibition timeframe for site compatibility certificate applications

From experience, the Department generally requests Council to respond to site compatibility certificate applications within two weeks. This timeframe is found to be insufficient to carry out an assessment of rezoning proposals, and there is no requirement for the Department to exhibit the application or notify neighbouring property owners for public comment.

If the objective of the CPP is to promote participation opportunities, the CPP should apply an exhibition timeframe for site compatibility certificate applications, which includes:

- A minimum 28 day exhibition period for site compatibility certificate applications.
- Notification to neighbouring property owners to comment on site compatibility certificate applications.

Issue 4: The Department should provide regular updates and responses on long-term projects

There is no formal process for the Department to provide regular updates and responses on long-term projects such as the preparation of draft legislation, strategies, policies and guidelines.

For example, the Department is yet to release the Submissions Report from the September 2017 exhibition of the Draft Sydenham to Bankstown Urban Renewal Corridor Strategy to demonstrate how the Department has responded to community input. There are no regular updates to inform the community on the status of the draft strategy.

If the objective of the CPP is to keep the community informed on the outcomes of engagement activities, the CPP should provide:

- Timeframes as to when the Department is likely to release Submissions Reports.
- The approach the Department will use to respond to individual submissions.
- Details as to how frequent the Department is likely to give updates on the status of long-term projects.

Issue 5: The Draft Community Participation Plan should specify that the Department will avoid exhibitions during the Christmas period

If the objective of the CPP is to ensure the community has reasonable time to provide input, the CPP should specify that the Department will avoid exhibitions during the Christmas period (at least from 20 December to 10 January). Where this cannot be avoided, the exhibition period should be extended by at least two weeks.

Issue 6: The Department should provide sufficient time for councils to update section 10.7 planning certificates

To improve the planning process, the Department should give councils at least two week notice to update planning certificates prior to the publication of relevant legislation changes.

Issue 7: The Draft Community Participation Plan should be consistent with the 'IAP2 Public Participation Spectrum'

Council applies the International Association for Public Participation Australasia's 'IAP2 Public Participation Spectrum', which is widely used by local government and industry to inform community participation approaches.

For consistency purposes, Table 3 of the CPP should use the same terms as the 'IAP2 Public Participation Spectrum' to describe the different community participation approaches.

If you have any enquiries or require further information in relation to Council's submission, you can contact Council officer Mauricio Tapia on 9707 9923.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'MTapia'.

Mauricio Tapia
Team Leader Strategic Planning