



We welcome the opportunity to provide feedback on the Department of Planning and Environment's draft Community Participation Plan currently on public exhibition.

We are very supportive of the Department's desire to improve engagement for communities as this is a very important and clear strategic objective of Central Coast Council. The following response is designed to ensure that the requirements included for local councils in the new legislation has the opportunity to continue to enhance or support the Central Coast Council approach and would like to provide comment and feedback for consideration.

Update and re-exhibition of existing policies seems unnecessary with no clear benefit or outcome

The current Draft Community Participation Plan (CPP) suggests the requirement of all councils to update and re-exhibit existing engagement or consultation policies and documents to 'have regard for the Community Participation Principles'. Over the course of many years, councils (including Central Coast Council) have been practicing and advancing community engagement and many already have sound policies and frameworks aligned with best practice industry standards set by the recognised peak body, IAP2. This includes alignment with industry standard IAP2 principles.

The proposed Community Participation Objectives (as referenced Table 2 on page 8) are already included in the IAP2 standard industry principles and would simply be an unnecessary repetition for a number of councils who may already use these to guide their engagement approach. This would not only confuse the public but also undermine the internal practices of many engagement practitioners in Local Government have worked hard to establish. Re-exhibiting existing council engagement policies or frameworks which already include IAP2 principles for the sake of 'having regard' and adding repetitive information seems unnecessary with no clear benefit.

We are disappointed that the work and delivery of many engagement professionals responsible for the development of these policies and frameworks within councils is being questioned on the assumption that basic engagement principles generally accepted as an industry and professional standard have not been incorporated.

Lack of reference to the International Association of Public Participation (IAP2)

The lack of reference to IAP2 appears to be an oversight. Most engagement and consultation professionals and practitioners are trained and align with the recognised peak industry body, IAP2; adopting the IAP2 Standard (or close adaptation of this), IAP2 principles and AA1000 Stakeholder Engagement Standard (AA1000SES 2015) in their work. There are also many community groups and associations who are familiar with or practice the IAP2 approach in their own projects and recognising this as best practice engagement.

It is noted that the draft plan seeks to offer different descriptions of engagement rather than reference the IAP2 engagement spectrum. This is referring specifically to Table 3: Community Participation Approach. There are three levels listed with Level 3 being 'Engage'. This is confusing and seems to be an oversight as Levels 1 and 2 are also levels of engaging. It would be more easily understood if the IAP2 Spectrum language was utilised for consistency as this aligns better with community understanding of community participation. It is understood by engagement practitioners and the community that important steps in engagement include Inform and Educate and that Engage



is not a third and separate step in the process. We suggest that the IAP2 known language of INFORM, EDUCATE, CONSULT, INVOLVE, COLLABORATE and EMPOWER is utilised. There is a risk otherwise that the term 'Engage' will only ever be related to public exhibition.

#### More emphasis and leadership on pre-public exhibition consultation

Public exhibition is not the only form of community consultation. Generally, public exhibition about a complex matter should be a final step in consultation and be informed by rigorous pre-exhibition consultation. In many circumstances, more consultation with the community is required pre-exhibition to achieve meaningful inputs and inform the decision-making process, which is the whole point of public participation.

This is a missed opportunity for the Department to take a stronger lead in changing the perception that public exhibition is sufficient community consultation. The Department is already taking a significant step by requiring the public participation, and has the opportunity to be forward thinking and reduce the 'tick the box' mentality of engagement via a public exhibition process. We would like to suggest that the Department include more direct language in the CPP that states public exhibition should not be relied on as the only form of consultation where there is scope for better consultation prior to this stage.

This could be a breakout box or placed somewhere prominent in the document.

#### Definition of Community Participation Plan

We are unsure whether or not we would need to change the name of our existing engagement document to meet the requirements of the Act. Our Community Engagement governance document is called a 'Community Engagement Framework' and serves the same function as that of the Department's description of a CPP.

To change the name of our framework would undermine the efforts and inroads we have already made to build awareness of this document both internally with staff and with our community. Central Coast Council has focussed on the community understanding of the Framework over the last two years and in fact was a guiding document for the development of the Central Coast Community Strategic Plan and has been fundamental in the move toward a place-based approach to engagement and planning.

We request that the name of a Council's CPP be broad enough to reduce the number of unnecessary changes to existing documents. Once again, this seems unnecessary layer of governance with no clear benefit to the public or local communities.

#### Our intention to comply

To comply with the Environmental Planning and Assessment Act, we are proposing to simply add the applicable exhibition timeframes stated in Section 3.2 of the Draft CPP as an attachment to our existing Framework.

We will then request confirmation from the Department that our Framework complies with the Environmental Planning and Assessment Act before placing it on exhibition for 28 days, explaining the attachment has been added simply to comply with the new layer of State Government Legislation. If the process of checking compliance with the Department before placing our CPPs on exhibition is an option available to councils, we request this be conveyed to all relevant CPP stakeholders with details on deadlines and typical turnaround times from the Department.



**Wyong Office:** 2 Hely St / PO Box 20 Wyong NSW 2259 | P 02 4350 5555

**Gosford Office:** 49 Mann St / PO Box 21 Gosford NSW 2250 | P 02 4325 8222

E ask@centralcoast.nsw.gov.au | W centralcoast.nsw.gov.au | ABN 73 149 644 003