

# Submission

Inquiry into Campbelltown City Council Boundary  
Change Proposal

December 2024



**Adelaide Hills**  
COUNCIL

# Executive Summary

The Adelaide Hills is a collection of suburbs, towns, and villages with their own unique character and identity, bonded by a common love of natural environment and tranquil lifestyle.

The communities of Rostrevor and Woodforde, along with the neighbouring suburb of Teringie, are collectively known as our foothills communities. While they enjoy the convenience of being located adjacent to the metropolitan area, these communities are very much an important part of the Adelaide Hills.

The Adelaide Hills Council is strongly opposed to the proposal by Campbelltown City Council to take control of this part of our community by shifting the boundary between our councils. The proposal submitted by Campbelltown City Council lacks clear justification and fails to demonstrate that a boundary change would be the most effective solution to any issues identified.

The proposed boundary change is divisive, expensive, and unnecessary.

The Adelaide Hills Council has considered the potential impacts of the proposed change from both a community and Council perspective. This submission outlines twelve key arguments supporting the retention of Rostrevor and Woodforde within the Adelaide Hills.

1. The Subject Areas have a special 'Hills' character that must be protected.
2. The proposed boundary change has been rejected by our community.
3. The boundary change proposal would fracture relationships within our community.
4. The Subject Areas are demographically more similar to the Adelaide Hills than the Campbelltown area.
5. The Subject Areas are already well serviced by the Adelaide Hills Council.
6. The boundary change would materially financially disadvantage Adelaide Hills and Campbelltown ratepayers.
7. Claims by the Campbelltown City Council that Adelaide Hills residents cannot have a say in Campbelltown City Council matters are both false and misleading.
8. As society has changed, so too has the concept of a 'community of interest'.
9. Daily routines are a matter of convenience and choice, not council boundaries.
10. Public facilities are for the use and enjoyment of all.
11. 'Quicker response times' by Campbelltown City Council is an unsubstantiated promise.
12. Campbelltown City Council makes long-term promises based on a short-term perspective.

The Adelaide Hills Council is calling on all decision makers to reject the proposed boundary change and stop the financial ambitions of a metropolitan council from threatening the sustainability of the services and infrastructure provided to our semi-rural community. The Adelaide Hills Council warns against making a decision that sets a precedent for other metropolitan councils bordered by regional councils.

In February 2019, Campbelltown City Council (CCC) submitted an initial proposal to the Local Government Boundaries Commission (LGBC) seeking a boundary realignment between CCC and Adelaide Hills Council (AHC).

The proposed boundary change applies to Woodforde and parts of Rostrevor and would see 738 properties transferred from AHC to CCC. This area includes established residential areas set amongst Adelaide Hills bushland, the recent 'Hamilton Hill' development on the site of the former Magill Training Centre, and the Rostrevor College campus and sports fields.

Figure One below identifies the areas that are proposed to be transferred to CCC, referred to in this submission as the 'Subject Areas'.

**Figure One: Map of Subject Areas (from CCC proposal to LGBC)**



In April 2022, CCC submitted a Stage Two proposal (the proposal<sup>1</sup>) to the LGBC. The proposal presented a range of claims and assumptions about communities of interest, proximity to council services, financial equity, and potential efficiency gains as the main justifications for the boundary change request.

A plan to inquire into the proposal (Inquiry Plan<sup>2</sup>) was finalised by the LGBC in October 2022. Independent investigators were appointed in July 2024, marking the official commencement of the Inquiry.

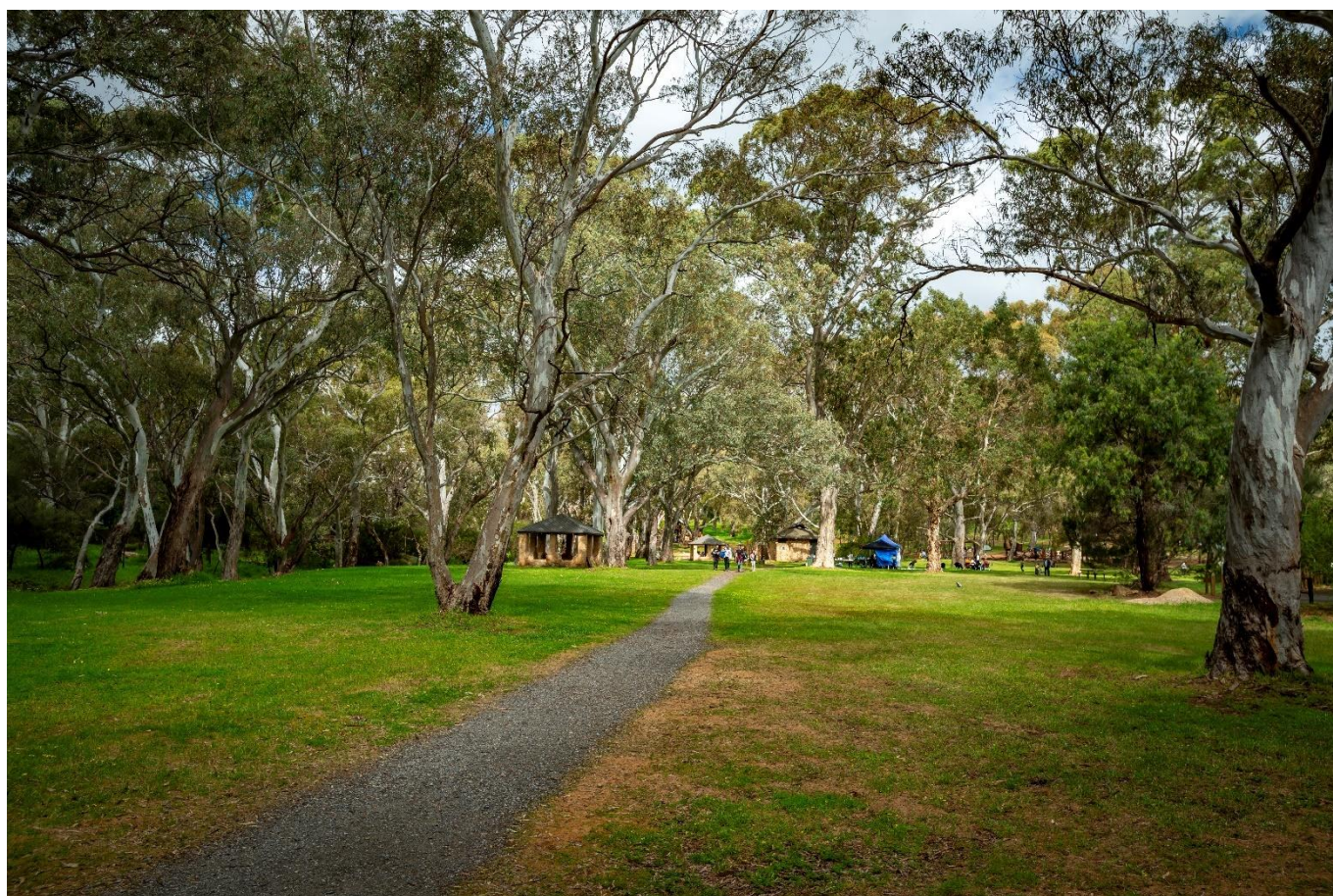
<sup>1</sup> [www.dit.sa.gov.au/local-government/documents/office-of-local-government/boundaries/campbell-city-council/Letter-for-Boundaries-Commission-to-accompany-Stage-2-Proposal-Attachment.pdf](http://www.dit.sa.gov.au/local-government/documents/office-of-local-government/boundaries/campbell-city-council/Letter-for-Boundaries-Commission-to-accompany-Stage-2-Proposal-Attachment.pdf)

<sup>2</sup> [www.dit.sa.gov.au/data/assets/pdf\\_file/0017/1135214/Campbelltown-City-Council-Adopted-Inquiry-Plan.pdf](http://www.dit.sa.gov.au/data/assets/pdf_file/0017/1135214/Campbelltown-City-Council-Adopted-Inquiry-Plan.pdf)



AHC recognises that CCC has exercised its right under the Local Government Act 1999 to request a boundary change review by the LGBC. While AHC has demonstrated that the proposal lacks merit, the Inquiry is seen as an opportunity to resolve a long-running pursuit by the CCC that has caused unnecessary angst within the community and expended significant public resources.

The AHC respects the important role of the Commission as an independent statutory body to provide advice to the Minister for Local Government on boundary change proposals. The AHC acknowledges the potential benefits of a holistic and strategic approach to local government boundary reform in circumstances where there is a clear evidence of community support and long-term benefits. Having commissioned a strategic review of our own boundaries and engaged in respectful and proactive discussions with neighbouring councils about potential change options, AHC supports thoughtful and evidence-based boundary reform where it serves the long-term interests of the community. This proposal does not meet those criteria, and it is incumbent upon AHC to represent our community, and ensure decision makers are well informed of the material, long-term impacts this proposal would have on the entire Adelaide Hills community.



# The Adelaide Hills Council's Vision for the Foothills 4

In contrast to CCC's vision for the foothills communities, which would see them divided and absorbed into dense suburbia, the AHC sees Rostrevor, Woodforde, and Teringie as a cohesive and connected part of the Adelaide Hills. The AHC future vision for the foothills is to preserve and protect the tranquil bushland setting, enhance the public realm to improve physical connections and shared amenities, and supporting events and locally-led initiatives that foster a strong sense of community. This vision was informed by neighbourhood conversations with Adelaide Hills residents in Rostrevor, Woodforde, and Teringie.

We see the AHC and CCC working together as constructive and community-focussed neighbours to address interface issues at our shared boundaries. Local governments work best when they work together.

This submission addresses key matters relevant to the Inquiry, and presents a clear, evidence-based position demonstrating why the proposed boundary change is divisive, expensive, and unnecessary.

## 1. The Subject Areas have a special 'Hills' character that must be protected.

While the CCC submits that many people would already perceive all of Rostrevor to be a part of the Campbelltown area (a claim that has not been substantiated), the distinct character of the area tells a different story. The area on the Adelaide Hills side of Rostrevor has a population density of 360 people/km<sup>2</sup>. The adjacent parts of Rostrevor in the CCC have a population density of 2,468 (north of Arcoona Avenue) and 3,039 (west of Stradbroke Road) people/km<sup>2</sup>.

The AHC has historically adopted a strategic position to defend its residents from the ad hoc urban infill development that now characterises many of the CCC's suburban areas. The distinct Adelaide Hills character of the Subject Areas are reflected in the stronger AHC planning rules.

While there is no direct link between changing council boundaries and the rezoning of land, we strongly believe that remaining within AHC is the best way to safeguard the special character of this area against insensitive urban expansion.

The different approaches by the AHC and the CCC to infill development are evident in the Hills Neighbourhood Zone policies. Even where the same zone applies, areas within the CCC allow for double the subdivision density that is permissible by the AHC, as outlined in Table One below.

**Table One: Comparison of Hill Neighbourhood Zone Planning Rules AHC and CCC**

Minimum / Maximum Planning Rules	AHC Hills Neighbourhood Zone	CCC Hills Neighbourhood Zone
Minimum Site Frontage (Detached)	20 metres	10 metres
Minimum Site Frontage (Semi-Detached)	18 metres	10 metres
Minimum Site Area (Detached)	1000m <sup>2</sup>	500m <sup>2</sup>
Minimum Site Area (Semi-Detached)	850m <sup>2</sup>	500m <sup>2</sup>
Maximum building height	8 metres	8.5 metres



The proposed boundary change would result in an anomaly where the CCC would have a contiguous Hills Neighbourhood Zone with differing planning rules. It is foreseeable that a future authority may seek to address this anomaly by applying a higher density zoning to the Subject Areas. Such an approach would be difficult for the CCC to defend given they have already claimed through this boundary change proposal that the Subject Areas are already perceived to be part of, and would be a logical expansion of, the suburban parts of the Campbelltown area.

A reality of life in the Adelaide Hills is being in a bushfire prone area. Due to its history and risk of future emergencies, the AHC is one of the leading councils in Australia when it comes to its emergency management processes. The AHC has well developed emergency management arrangements that are in place to support the community and emergency services before, during and after emergencies.

Should the proposal progress, affected properties in bushfire and flood prone areas would lose access to the AHC's detailed processes and experience in supporting residents.

The Subject Areas would also be absorbed into Adelaide's outer suburban areas and lose the dedicated focus on biodiversity, ecosystem management, and native vegetation that come with being part of the Adelaide Hills.

The AHC has a long and focussed history of supporting the unique Adelaide Hills environment and has a range of strategies and policies to preserve and enhance the landscape of the Adelaide Hills. Residents in the Subject Areas benefit from the AHC's dedicated focus on preserving the unique character and natural environment of the region.





## 2. The proposed boundary change has been rejected by our community. 6

In two separate community surveys commissioned by AHC and CCC in 2019/20, 62-65 percent of respondents were not in favour of the boundary change proposal.

In initiating the 2022 plebiscite seeking views on a potential amalgamation between the City of Mount Gambier and District Council of Grant, the State Government put forward the strong view that the people who would be most affected by a boundary change should have a say as to whether an investigation into it should take place.

When the majority of votes in the 2022 plebiscite were not in favour of examining a proposed amalgamation, the matter went no further.

If the same logic had been applied in this case, this proposal would not have progressed to an Inquiry.





### 3. The boundary change proposal would fracture relationships within our community 7

CCC argues that the Subject Areas are widely perceived to be part of Campbelltown, and do not share a special relationship with the Adelaide Hills. This claim is not supported by the affected communities.

The Morialta Residents Association (MRA), formed in 1968, is an active community group that seeks to protect and enhance the distinct character and environment of the portion of Rostrevor located in AHC. The MRA has expressed strong opposition to the proposal citing, amongst other things, a deep connection with the natural environment of the Adelaide Hills and no connection with the suburbs of Campbelltown that are characterised by ad-hoc infill development. The AHC has a long-standing relationship with the MRA, including support for local environmental initiatives and engaging closely on transport and infrastructure matters.

The newly constituted Woodforde Residents Association (WRA) is an example of the community connections that have formed between the established residential areas of Woodforde and the new residents of 'Hamilton Hill'. The AHC has provided grants to support this community-led initiative and is engaging positively with the WRA to address a range of community, planning, infrastructure, and transport matters.

The AHC has been working with the Hamilton Hill developer, Kite Projects, over several years to install and manage infrastructure and public realm improvements to support this new community. Kite Projects market the development as being in a semi-rural location in the Adelaide Hills and has publicly declared support for Hamilton Hill remaining part of the AHC. A boundary change would necessitate restarting complex discussions and negotiations about infrastructure and public realm improvements with a different council, posing a considerable set-back to the Woodforde community and the developer.

AHC residents of Rostrevor and Woodforde share a connection and community of interest with the residents of Teringie, jointly forming the foothills communities of the Adelaide Hills. A 2024 foothills community forum held by AHC confirmed a shared passion for the trees, access to nature, large blocks, and strong sense of community that characterise these areas. If the proposal were to proceed, the 147 properties located in Teringie would be administratively disconnected from their neighbours, leading to inefficiencies and community division.





#### 4. The Subject Areas are demographically more similar to the Adelaide Hills than the Campbelltown area. 8

The AHC has reviewed 2021 Census data to assess the claim by CCC that the Rostrevor and Woodforde communities have more in common with the Campbelltown area. The data tells a different story.

The two Statistical Areas we reviewed (Woodforde and Rostrevor) have distinct populations and built form and, from a demographic perspective, should be considered as two separate Subject Areas.

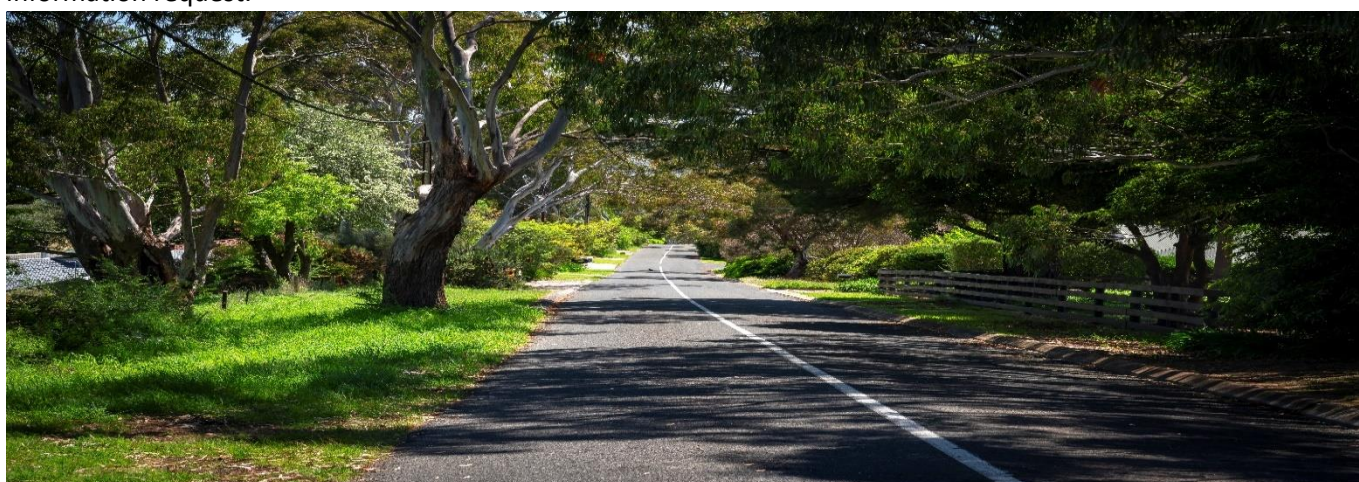
The AHC community of Rostrevor is older, well established, wealthier, and has more owner occupiers. The subject part of Rostrevor has no medium or high-density development, making it much more similar to the Adelaide Hills overall in terms of population density.

The community of Woodforde is changing due to the many new residents of Hamilton Hill. The Woodforde community is younger, healthier, has more new residents, is more culturally diverse, and has more people renting their home. Woodforde is still predominantly characterised by separate houses, but has a mix of medium and high density dwelling types. The population density of Woodforde (1220.7 persons per km<sup>2</sup>) is much lower than the CCC overall (2249.6 people per km<sup>2</sup>), and is comparable with other AHC suburbs and towns, including Teringie, Stirling, Bridgewater, Gumeracha, Woodside, Lobethal and Oakbank.

Both Statistical Areas share common characteristics with the CCC and the AHC, and there are some characteristics that are unique to each area. However, on balance, both areas are more statistically similar to the AHC than the CCC. Key characteristics that make these areas more similar to the AHC include:

- Population density
- Median household income
- Median mortgage cost
- Proportion of mortgage holders
- Proportion of lone households
- Social housing
- Proportion of population aged 5-17 years
- Proportion of population aged over 85 years
- Labour force participation
- Employed as managers or professionals

Detailed data analysis has been provided to the investigators appointed by the LGBC in response to an information request.



## 5. The Subject Areas are already well serviced by the Adelaide Hills Council. 9

The CCC proposal makes a number of unfounded claims about the services available to the communities in the Subject Areas and presents an extremely metro-centric view of local government that confuses proximity for efficiency.

The Subject Areas are located closer to the principal office of CCC than AHC. While this fact is presented by CCC as an extreme anomaly and justification for an expensive and disruptive boundary change, it is not an unusual occurrence in local government. Most councils would service at least one area that is located closer to an office or depot of a neighbouring council. It is noted, for example, that the depot facility of the City of Norwood, Payneham, and St Peters in Glynde is located approximately 250 metres from the CCC western boundary. We contend that CCC would not agree that residents in the western areas of their council would be better served by transitioning into the City of Norwood, Payneham and St Peters.

From the period January 2022 to July 2024, AHC has responded to 1430 service requests in Teringie, Woodforde, and Rostrevor. Teringie has been included in the data as this area is intrinsically linked to the Subject Areas from a servicing efficiency perspective. The service request data indicates that there are no service delivery issues necessitating a boundary change. The AHC has effective mechanisms in place for residents to lodge service requests, and it has the capacity to respond to the needs of our community.

Another claim made by the CCC is that older residents in the Subject Areas are disadvantaged by not having access to their Commonwealth Home Support Program (CHSP) services. The CCC has failed to acknowledge the 13 registered CHSP clients in the Subject Area receiving regular home assistance from the AHC. Services provided include home cleaning, home maintenance, home safety modifications, social support and case management. The proposed boundary change could mean these clients may no longer receive these services from the chosen provider, creating disruption and confusion, and breaking the relationships of trust and friendship that form between CHSP clients and providers.





## 6. The boundary change would materially financially disadvantage all AHC and CCC ratepayers.

A central premise of the CCC proposal is that it would relieve the AHC of the burden of servicing a distant community, resulting in unquantified efficiencies and cost savings. These claims cannot be substantiated.

The total rates revenue received by the AHC from the Subject Area for 2024/25 is \$1.932 million, which comprises 3.76% of the AHC rate base. Reducing AHC's population and rate base by this amount would have significant long-term financial implications for AHC ratepayers and place pressure on the financial sustainability of AHC.

Other than a few property-based services such as waste collection charges, which are a genuine variable cost to council, there would be limited opportunities for the AHC to reduce operational expenditure if the proposal proceeds. The cost of providing council-wide services such as libraries, community centres, events, sports and recreation, and cemeteries will not reduce, but there will be less ratepayers to share those costs every year.

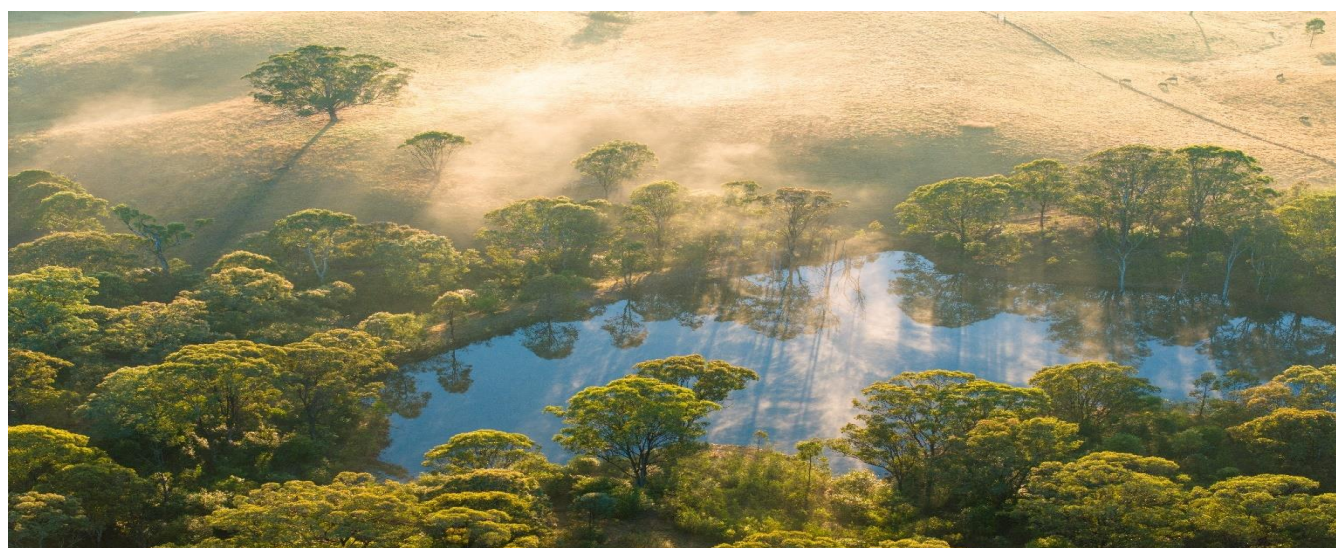
The AHC and its community would also be disadvantaged by a reduction in the value of grants that are based on population, such as Commonwealth Financial Assistance Grants and State Government library funding.

The material and compounding financial impacts of the proposal going ahead would place upward pressure on our council rates and risk the financial sustainability of the services we provide to our community.

CCC ratepayers also have significant cause for concern. This boundary change proposal is a political and operational distraction that is diverting focus and resources away from existing services and projects. While the estimated cost to CCC ratepayers to investigate the boundary change is \$160,000, this does not include the considerable staff time and resources required to undertake research, collate information, prepare submissions, participate in meetings, prepare reports and briefings, etc.

If the boundary change were to go ahead, CCC ratepayers would also be impacted by the yet to be quantified costs of transferring asset ownership, developing new representation structures, and servicing an expanded council area. The AHC submits that CCC ratepayers would be better off if their Council concentrated on servicing its existing communities.

Overall, the proposed boundary change is a bad deal for the entire AHC and CCC communities.



## 7. Claims by the CCC that AHC residents cannot have a say in CCC matters are<sup>11</sup> both false and misleading.

The CCC proposal states that:

*‘Currently Adelaide Hills residents who use Campbelltown facilities and services have no say in shaping these facilities and service. They have no say in Council’s budget and they cannot participate as Community Members of Council’s important Section 41 Advisory Committees’ (page 16).*

These statements are both false and misleading. A boundary change is not required for CCC to recognise or include its neighbouring communities.

CCC’s Appointment to Committees, CAP and External Bodies Policy refers to appointees having an ‘affinity with the community as a whole’ but does not require members to be residents of CCC. The Terms of Reference for CCC Committees also does not preclude non-residents from their membership, but welcoming members who live, work, recreate or study in the CCC area. Membership is also open to people with special skills, knowledge or experience, regardless of where they live.

Claims that the residents of the Subject Areas have no say in Council budgets or ability to influence and shape the services provided by CCC are also inaccurate. Consultation is undertaken on CCC’s Annual Business Plan and Budget in accordance with its Public Consultation Policy. CCC’s Public Consultation Policy defines ‘Community’ as:

*“all people who live, study or conduct business in, or who visit, use or enjoy the services, facilities and public places of the City of Campbelltown.”*

There is no preclusion on residents of the Subject Areas making submissions during public consultation periods and no rights afforded to CCC to reject or not have regard to any reasonable submissions made.

A boundary reform is not required to give residents of the Subject Areas a right to have a say.





## 8. Our society has changed, so has the concept of a ‘community of interest’. 12

Our functional relationships – where we work, shop, access services, recreate, and connect with others – have historically been used to define our ‘communities of interest’.

The CCC proposal draws on selective findings from council boundary reviews undertaken in the 1970s and 1990s, and definitions from the 1980s, to support a claim that the Subject Areas share a ‘community of interest’ with Campbelltown. This is based on factors such as where people buy their groceries and do their banking.

These findings are now 25 – 50 years old, and so much has changed about how we shop, connect, and access services. In 2024, we can no longer define a community of interest in the same ways we did in the days of the corner store, local bank tellers, landline phones, and print media.

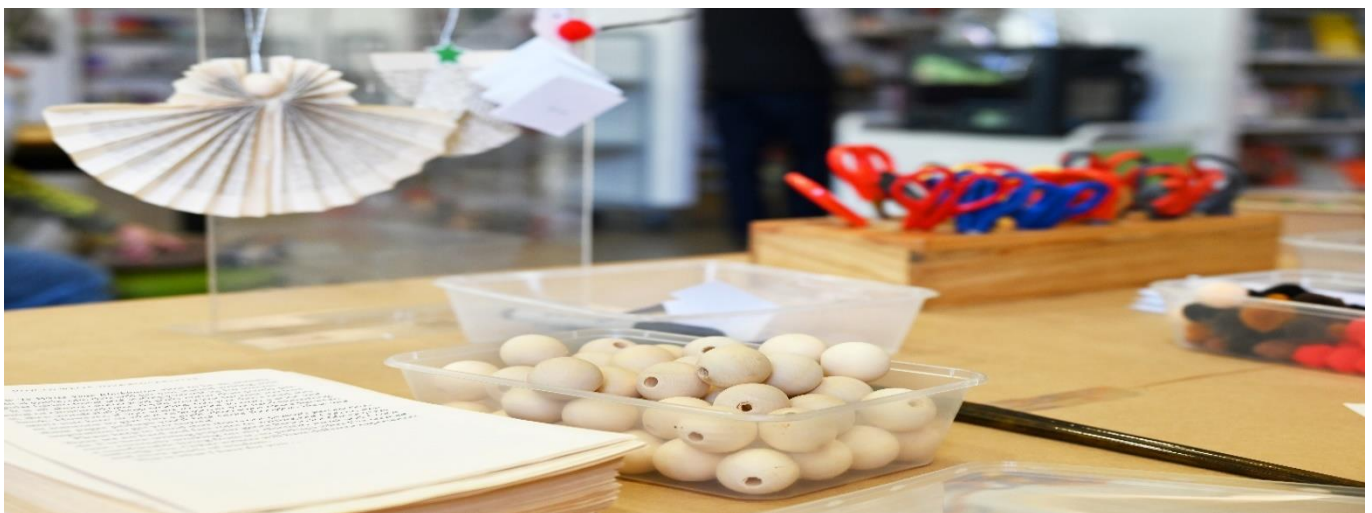
While physical communities remain an important part of the social fabric, technology and the advent of the internet has profoundly transformed the concept and definition of communities of interest by redefining the parameters of connection, communication, and belonging.

The concepts applied by the 1970s Royal Commission refer to a time when communities of interest were primarily formed through physical proximity or shared offline activities. However, the internet has significantly broadened this concept by removing physical constraints and allowing individuals to belong to multiple communities simultaneously.

Many of the activities that used to occur within a physical ‘community’ have changed, including:

- Shopping and banking transactions can now be conducted online
- Automation, AI, and the gig economy are changing where and how people work, with people attending a physical workplace less often
- Tertiary study can now be accessed remotely and homeschooling is becoming the fastest growing education demographic in Australia
- Local news and information about events, services and programs is largely consumed online
- Social interaction and recreation can occur from within the home on a smart phone, gaming console, or other device
- It is possible to join a public library online and access content from the online catalogue, or any other public library.

The AHC calls on the LGBC to apply a more contemporary definition of ‘communities of interest’ that recognises our significant societal shifts when considering this proposal.



## 9. Daily routines are a matter of convenience and choice, not council boundaries.

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There is little doubt that residents of the Subject Areas, and indeed the broader Adelaide Hills community, regularly visit shops, services, and facilities in other council areas. Similarly, the Adelaide Hills welcomes residents from its neighbouring councils for many purposes. It does not follow that the council boundaries are wrong, because economic and retail catchments do not correspond with council boundaries.

If daily activities are to be considered relevant to council boundaries, the proposal does not contemplate that residents of Woodforde and Rostrevor may also be likely to shop and use services in other councils, such as where they work.

Journey to work data from the 2021 Census shows that only 1.5% of AHC residents work in the Campbelltown area. AHC residents are twice as likely to work in the Cities of Burnside (3.5%), Mitcham (3.4%), and Norwood, Payneham and St Peters (3.8%). Approximately 17% of AHC residents work within the CBD. As such, it is reasonable to assume that AHC residents rely on multiple Council areas to meet their daily needs.

## 10. Public facilities are for the use and enjoyment of all.

The CCC proposal points to the library and ARC leisure centre memberships held by some AHC residents as evidence that the council boundary is wrong.

As stated on the CCC website, *'If you are a member of any Public Library in South Australia, then you already have membership to Campbelltown Library through the One Card Network'*<sup>3</sup>. Due to the unique nature of South Australia's public library system, a person may join at the library closest to their home or work, but they are not required to exclusively use that facility.

According to their Annual Reports, the CCC library received 173,133 visits in 2022/23, while the AHC library received 189,006 visits. The library visitor to population ratio for the AHC is 4.52 visits per person. The CCC library visitor to population ratio is much lower at 3.03 visits per person. These figures do not support CCC's claim that they are inequitably funding library services for AHC residents.

'The ARC' is a regional-scale recreation and leisure facility owned by the CCC that services a catchment of the north-eastern area of Adelaide. The redevelopment of the facility was supported by State and Federal Government Grants totalling \$10.5 million, recognising the broader servicing role of the facility beyond CCC's boundary. It is unsurprising that some Adelaide Hills members have chosen to pay for membership at this regional facility, which is intended for the enjoyment of all.

It is likely that the ARC has many members who do not pay rates in CCC, beyond some who live in Woodforde and Rostrevor.

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<sup>3</sup> <https://www.campbelltown.sa.gov.au/library/librarymembership>



## 11. 'Quicker response times' by CCC is an unsubstantiated promise.

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The CCC boasts that it could offer quicker response times from its maintenance teams.

In the rare circumstances where immediate deployment of a team is required to attend to a service request, AHC teams are capable of attending the Subject Area within 25-30 minutes.

However, in most instances, subject to an assessment of immediate risk to public safety, report of a hazard would be actioned by the AHC within 24 hours<sup>4</sup>. The CCC also offer 'same day' assessment of public safety concerns where practicable<sup>5</sup>.

The CCC's service policies are substantially the same as that of the AHC and offer no guarantees that service requests will be attended immediately. The AHC responds to an average of 46.1 customer service requests from our foothills communities per month. These figures demonstrate the AHC's commitment to servicing this part of the Adelaide Hills, and do not support the CCC narrative that service levels in this area are impeded by distance.

## 12. CCC makes long-term promises based on a short-term perspective.

The CCC is selling the promise of cheaper council rates to the ratepayers in the Subject Areas.

In 2024/25 the average rates of the CCC are lower than AHC rates. These differences are not uncommon. For example, the 2024/25 average rates of the CCC are almost \$700 more expensive than those in the neighbouring City of Port Adelaide Enfield.

However, these are point in time comparisons and cannot serve as a reliable long-term justification for a permanent boundary change. The revenue and expenditure of different councils vary due to numerous factors and can change at any time in response to new or changed internal or external cost pressures, as well as decisions made by councils regarding service levels.

This is the reason that council boundaries are not drawn based on council rates or service levels, as supported by the Guidelines of the Commission:

*'It's important to note at the outset that dissatisfaction with the services provided by a council is not sufficient reason to make a proposal to the Commission. For example, you may be unhappy with the rates that your council imposes. This is not a reason for changing council area but is something that you should discuss and resolve with your council'*<sup>6</sup>

The CCC also makes claims about its healthy long-term financial position, and its ability to invest in local infrastructure. This is another long-term promise made on a short-term outlook, that is subject to unpredictable variables from year to year. It is also not supported by the facts. In 2024/25 the CCC's total capital expenditure budget is \$11.63M, compared to AHC's \$16.18M. Any council can strengthen its balance sheet by overrating its community relative to the amount it spends on providing services and renewing or investing in new infrastructure.

The AHC urges the LGBC and the community to reject these short-term promises, as they lack credibility and cannot be substantiated.

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<sup>4</sup> <https://www.ahc.sa.gov.au/services/service-standards-and-complaints>

<sup>5</sup> [https://www.campbelltown.sa.gov.au/data/assets/pdf\\_file/0025/233971/Request-for-Service-and-Complaint-Handling-Policy-adopted-5-December-2023.pdf](https://www.campbelltown.sa.gov.au/data/assets/pdf_file/0025/233971/Request-for-Service-and-Complaint-Handling-Policy-adopted-5-December-2023.pdf)

<sup>6</sup> <https://www.dit.sa.gov.au/local-government/documents/office-of-local-government/boundaries/guidelines-for-preparing-a-proposal/Boundaries-Commission-Guideline-6-Public-Initiated-Submissions-Version-4.0-4-September-2023.pdf>

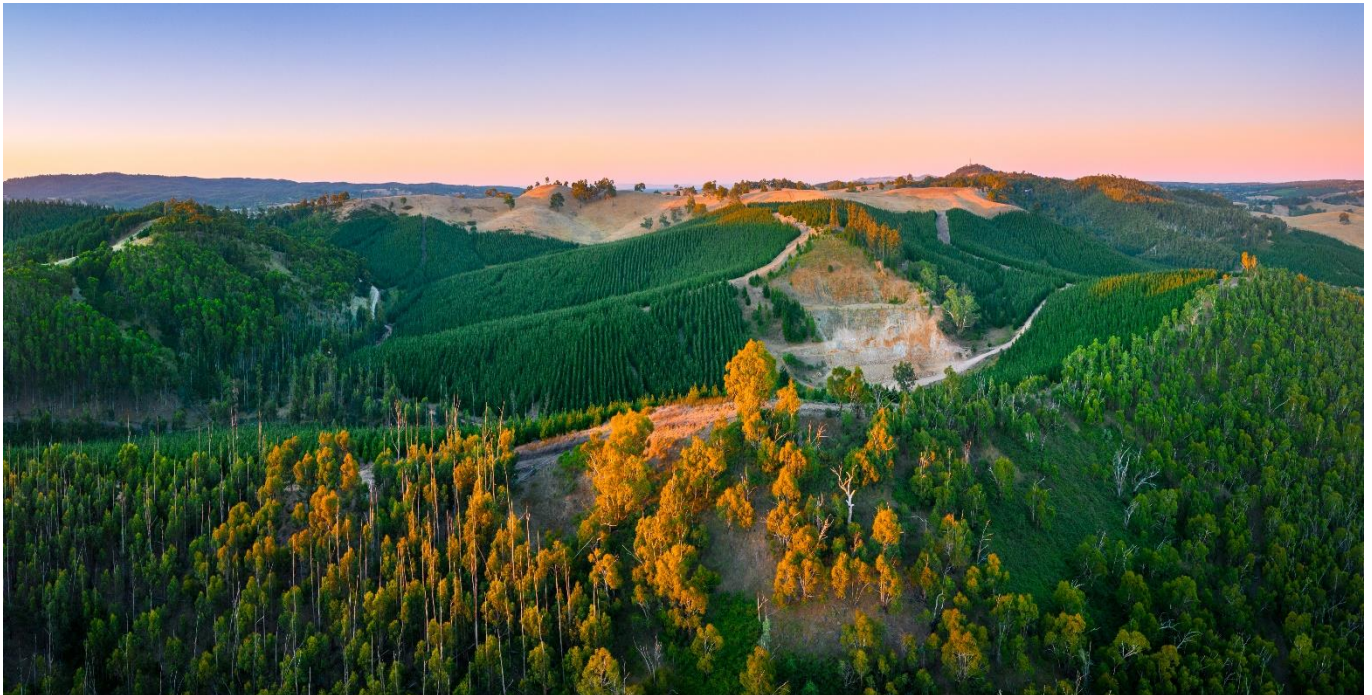
The AHC finds no compelling reason to support the boundary change proposal initiated by the CCC. The proposal makes a number of unsubstantiated claims about potential benefits, yet fails to define an actual problem that a boundary change would solve.

The implementation of a boundary change would be a significant undertaking, incurring considerable time and resource costs from both councils and other stakeholders during a prolonged transition period.

Accepting the boundary change proposal would risk setting a precedent of metropolitan council's threatening the sustainability of the services and infrastructure provided by neighbouring regional councils.

The AHC is committed to its vision for the foothills community of Rostrevor, Woodforde and Teringie. AHC focus remains on preserving the unique Hills character and identity of these areas while strengthening their physical and social connections. AHC urge decision makers to reject the proposed boundary change, spare communities from significant cost and disruption, and allow the AHC to continue focussing on delivering the high-quality services and support our community deserves.

Given the significant long-term consequences for the AHC, the community and other stakeholders, the Council requests that the Commission ensure a fully transparent and participatory Inquiry, including providing the Council with the opportunity to review and comment on the draft Investigator's report prior to recommendations being finalised.







08 8408 0400  
mail@ahc.sa.gov.au  
ahc.sa.gov.au

