

Attention: Stephen Mahon, Manager Council and Customer Service

Submission of Objection

5/12/14

Macedon Ranges Draft Community Consultation Framework

Note: Information about consultation and submissions was removed from Council's website prior to the final day of exhibition and closing time for submissions.

1. Introduction

One of the most prevalent community concerns in Macedon Ranges Shire is Council's current inability or lack of will to effectively, factually, consistently and inclusively consult and communicate. These concerns are not alleviated by the draft Framework, and the Association does not support its adoption by Council.

2. Key Issues

The draft Framework is found to be:

- Less open, accountable and inclusive than the existing Framework - and more selective/exclusive about who it consults about what Council does.
- More focussed on "stakeholder" instead of whole-of-community consultation, with Council determining who needs to know.
- Making consultation more dependent upon whether Council has the resources or time to consult at all.
- More a Council "memo to self" than a document intended to have broad community ownership.
- Providing Council with more 'wiggle-room' and self-determination rather than making firmer commitments to community engagement.

2.1. Lack of (Less) Commitment to Community

At page 6 Levels of Public Participation:

The categories only partially reflect those in the existing Framework (page 12 Spectrum of Public Participation). Existing Public Participation Goals are included in the draft Framework, but **none** of the existing Framework's "Promises to the Public" are included. The draft Framework instead substitutes more "memo to self" instructions for the existing Framework's commitment to community.

2.2. Council Control, Not Community Engagement

The draft Framework notably omits references to engagement found in the existing Framework, confirming this draft is not about community engagement. This will further undermine Council's already abysmal community ratings for engagement. The overall impression is that the draft Framework is instead focussed upon empowering Council, not the community, in why, when and who is consulted. It gives Council total control over who it chooses, and doesn't choose, to consult.

2.3. Less Information, Fewer Facts

The draft Framework deletes the existing Framework's commitment to providing appropriate information (at page 8): "*Consultation is most effective when people have the facts before them*". This reduced commitment, and Council's historical reluctance (if not refusal) to make all or even relevant information available is reinforced by the deletion of the existing Framework's requirement (page 8, at Provision of Information, dot point 3):

“Information relating to the consultation is to be made readily available so that participants can make informed and timely contributions”

and its replacement with (Principles underpinning Council’s Consultation, page 7, at 4 Informed, point 4.2):

“Participants are informed enough to be able to contribute in a meaningful way. They are given all the information required to be able to weigh up various factors and considerations that will impact a decision”

2.4. Changed Consultation Methods (matrix at page 11)

- Introduction uses jargon that excludes broad understanding.
- Existing “One-off Issues” category is deleted entirely. Five categories only are retained (note: introduction at page 10 still says six categories). Does Council now propose to deal with these issues in an *ad hoc* manner?
- Letters/Fliers are omitted from notice on site and community noticeboard options (and from all forms of proposed consultation).
- “Exhibition” is excluded from submissions option.
- Formal market research is omitted from the document (presumably leaving all surveys to be prepared in-house).
- Feedback at Council offices/service centres is no longer included as an option.
- Personal contact / or meetings on-site is no longer included as an option.
- More reliance on Council’s website and online surveys, less on community newsletters.
- The more ‘grass-roots’ means of gathering feedback appear to be excluded in favour of more elitist and selective consultation types.

3. Conclusion

Other than point 3.4 at page 7 (no consultation over Christmas) the draft Framework provides a narrower definition of consultation than currently exists. It empowers Council, giving Council greater autonomy to make up its own mind about who it consults about what, while disempowering the community. Less, not more, for community.

The community experience is that Council avoids wherever possible genuine consultation, communication and engagement. If it does consult, Council more often than not ignores its current Consultation Framework, and communicates with spin. This document suits Council as it is very self-focussed and inward-looking.

The draft Framework appears to be formalising the unsatisfactory consultation practices Council already engages in, which have already been rejected by the community. How the document will work can be seen in the very selective consultation currently being undertaken for Council’s Rural Living Strategy. Despite everyone in the Shire being affected by the intense subdivision council proposes, Council has chosen to only communicate with those who are likely to (a) in the main support Council’s proposals, and (b) want more of it all over the Shire. Exclusive, not, inclusive, consultation, aimed at getting the responses Council wants.

Given all of the above, it seems quite appropriate that the cover of this document features tree trunks, because the overall impression that can be taken from it is of a Council that can’t see the forest for the trees (trunks).

4. Recommendations

That the draft Community Consultation Framework be rejected.

That Council retain the existing Consultation Framework, adding point 3.4 (page 7) from the draft Framework.

MARRA Contacts: Brian Whitefield (President); Christine Pruneau (Secretary)