

Supplementary Submission

**Inquiry into Campbelltown City Council
Boundary Change Proposal**

June 2025



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1. Executive Summary

This supplementary submission is provided by the Adelaide Hills Council in response to the Campbelltown City Council boundary change proposal currently under investigation by the South Australian Local Government Boundaries Commission (the Commission). It builds upon Adelaide Hills Council's initial submission lodged in December 2024 and provides a structured assessment of the proposal against the principles set out in Section 26 and Section 31(3)(b) of the *Local Government Act 1999* (the Act).

Adelaide Hills Council maintains that the proposal fails to meet the statutory criteria for boundary reform and gives rise to significant concerns not only for the directly Affected Area—Rostrevor and Woodforde—but for the entire Adelaide Hills Council district.

The proposal would result in the removal of over 700 properties, including Hamilton Hill, one of the few high-density residential areas within the Adelaide Hills Council. This would reduce Council's rate base by approximately 3.76 per cent, placing increased financial pressure on the remaining ratepayers and compromising the Council's long-term ability to maintain service levels and deliver infrastructure across the district. The loss of this revenue cannot easily be offset due to planning restrictions under the Greater Adelaide Regional Plan, which limits future residential growth opportunities in the region.

Moreover, the submission highlights that the proposal disrupts a well-functioning, place-based service model. Adelaide Hills Council provides tailored services that reflect the area's unique geography, bushfire risk, and semi-rural character—services that are not easily replicated by a metropolitan council operating in a compact, urban environment. Campbelltown City Council has not demonstrated the capability or resourcing required to maintain the same level of emergency preparedness, environmental stewardship, or community engagement that Adelaide Hills Council currently delivers.

Importantly, the proposal does not have broad community or regional support. This opposition reflects strong community identity, connection to the Hills region, and a lack of confidence that the proposed transfer would provide meaningful benefits.

The submission also notes that the effects of the proposal would ripple beyond the Affected Area. It would undermine Adelaide Hills Council's financial sustainability, erode regional partnerships, and set a concerning precedent for future boundary changes.

In summary, Adelaide Hills Council respectfully submits that the proposed boundary change fails to meet the legislative intent of structural reform and urges the Commission to reject the proposal in the interests of fair, effective, and sustainable local government. Council's supplementary submission reinforces this view with a focused account of its tailored service delivery in Hamilton Hill and the broader foothills area—demonstrating that residents are already well served under the current arrangements and would face tangible risks if transferred to a metropolitan model not designed for this context.

2. Assessment against Section 26 of the *Local Government Act 1999*

1. Section 26(1)(c)(i)

“the resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community;”

From a servicing and community development perspective, Adelaide Hills Council views its foothills areas of Rostrevor, Woodforde, and Teringie as one cohesive and contiguous community within the broader Adelaide Hills region. The proposed boundary change would remove Rostrevor and Woodforde, and isolate Teringie, from this long-established natural and social connection.

This outcome would undermine both economic efficiency and community cohesion. Under the current arrangements, Adelaide Hills Council is able to deliver services to these three suburbs holistically, with a tailored focus on environmental stewardship, bushfire preparedness, and support for community-led events, services which align with the semi-rural and bushland character of the area. Fragmenting the region would complicate service delivery, create inefficiencies, and diminish the economies of scale currently achieved.

More broadly, Adelaide Hills Council’s vision for the foothills—developed through local conversations with residents of Rostrevor, Woodforde, and Teringie—is one of preservation and place-making. This vision focuses on protecting the natural landscape, enhancing public spaces, and strengthening the social fabric of these interconnected communities. These priorities were clearly articulated by residents themselves during an April 2024 Community Forum run by Adelaide Hills Council, where participants expressed a strong connection to nature, appreciation for local wildlife, and a shared desire to maintain the unique character and amenity of their neighbourhoods.¹

In contrast, Campbelltown City Council’s proposal implies a connection with suburban Adelaide, risking the identity and aspirations of foothills residents, and creating a significant and unnecessary division within the community.

2. Section 26(1)(c)(ii)

“proposed changes should, wherever practicable, benefit ratepayers;”

It is Adelaide Hills Council’s submission that the reference to ratepayers in clause 26(1)(c)(ii) of the Act requires the Inquirers to consider the impact of the proposal on all ratepayers in Adelaide Hills Council and Campbelltown City Council, not just ratepayers in the Affected Areas. In geographically large Councils with interspersed townships (such as Adelaide Hills Council). It is a universally accepted truth that the rates from higher density areas subsidise services across the Council area, particularly for an extensive road network and asset holding cross the Council (over 50 townships in Adelaide Hills Council). Solely focusing on the place based ‘benefits’ to rate payers in the Affected

¹ [Community Forum Outcomes Report April 2024](#)

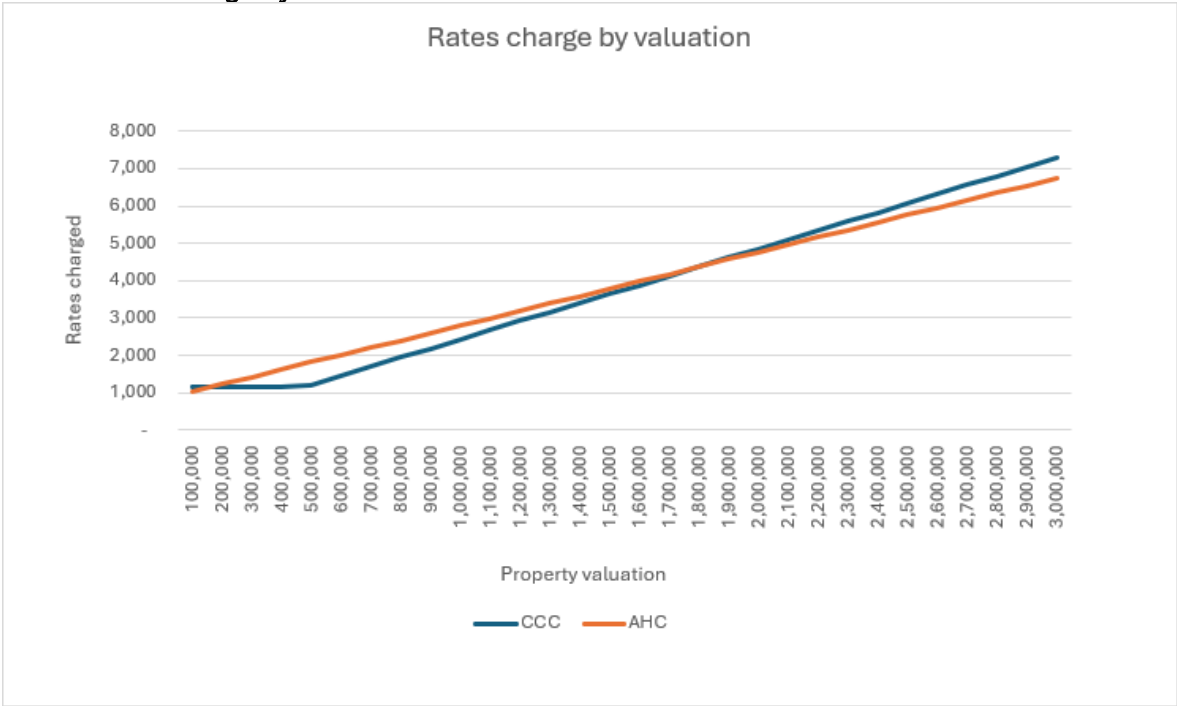
Areas would provide a false understanding of the impacts of any change on ratepayers across the Council’s affected by the proposal.

Crucially, the impact of this proposal extends beyond the Affected Area. The removal of a significant residential area from Adelaide Hills Council’s rating base would affect the financial sustainability of the Adelaide Hills Council as a whole. Council’s fixed costs would remain, but would need to be absorbed by a smaller pool of ratepayers, leading to increased rates or a reduction in services across the district.

There is no compelling evidence that the proposed boundary change would deliver tangible benefits to ratepayers in the Affected Area. While the proposal makes general claims about service improvements, these are not supported by a clearly defined problem or detailed service modelling. In fact, the disruption and transition costs associated with a boundary realignment—combined with service duplication, administrative overheads, and the loss of existing service efficiencies—are likely to result in poorer outcomes for all affected communities.

For residents in the Affected Area, the financial benefits are also questionable. Rate modelling conducted by Adelaide Hills Council indicates that properties with higher capital values may face increased rates under Campbelltown City Council (see Table 1 below).

Table 1: Rates charge by valuation



Source: Public rates data from AHC and CCC

At the same time, these residents risk losing access to a service model specifically designed for the foothills context, including bushfire preparedness and environmental protections.

Adelaide Hills Council has deep operational knowledge of this terrain, having worked closely with local CFS brigades, landholders, and government agencies to manage risk and plan for emergencies. Transitioning to Campbelltown City Council could compromise the level of service and local knowledge that is critical in emergency situations.

In summary, the proposal does not clearly benefit ratepayers—either in the Affected Area or across the broader Adelaide Hills Council region. On the contrary, it risks financial disadvantage, reduced service quality, and increased vulnerability, particularly in bushfire-prone areas.

3. Section 26(1)(c) (iii)

“a council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently;”

The proposed removal of over 700 properties from the Adelaide Hills Council would reduce its rate base by approximately 3.76 per cent. This is not a marginal adjustment. It represents a significant erosion of the council’s financial foundation and threatens its long-term capacity to deliver services equitably across the district.

Hamilton Hill is uniquely important within the Adelaide Hills Council. Unlike the majority of the council area, which is semi-rural and composed of small towns and low-density housing, Hamilton Hill is the highest density residential area within Adelaide Hills Council. This makes it a critical contributor to the council’s rate revenue. Its loss would disproportionately affect Adelaide Hills Council’s financial sustainability, as there are limited opportunities to replace this revenue elsewhere.

Under the Greater Adelaide Regional Plan (GARP), urban expansion in Adelaide Hills Council is constrained by Environment and Food Protection Areas (EFPA) and character preservation legislation, which limits the release of new greenfield land to safeguard areas of rural, landscape, environmental or food production significance.² While local infill and township growth may offer some scope, replacing the loss of the rates revenue of Hamilton Hill would prove challenging. The GARP notes that by 2051 the Adelaide Hills region is anticipated to accommodate more than 128,000 people which will be primarily “driven by Greenfield growth in and around Mount Barker,”³ which is part of Mount Barker District Council, not Adelaide Hills Council.

Aside from Mount Barker, there are no additional growth areas identified for the Hills region other than “small-scale infill development or minor expansion of existing townships.”⁴ The removal of Hamilton Hill from Adelaide Hills Council could reduce Council’s capacity to generate rates revenue, placing increased pressure on remaining ratepayers leading to service reductions or rate increases.

In short, this proposal undermines the council’s ability to function fairly, effectively and efficiently, in direct contradiction to the principles the Commission is seeking to uphold.

4. Section 26(1)(c) (iv)

“a council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis;”

Adelaide Hills Council has consistently demonstrated its capacity to deliver a broad and responsive range of services tailored to the needs of its geographically diverse and environmentally sensitive region. In the Affected

² Greater Adelaide Regional Plan, 2025, Page 18

³ Greater Adelaide Regional Plan, 2025, Page 301

⁴ Greater Adelaide Regional Plan, 2025, Page 305

Area—particularly in Hamilton Hill—Council provides a range of targeted, place-based services that directly respond to community needs and expectations.

Recent works in Hamilton Hill have included:

- Extensive road line marking and traffic safety upgrades, including repainted and extended markings at key intersections such as Glen Stuart and Morialta Road, Kintyre Road, Heather Avenue, and Glengarry Drive, with further works scheduled before end of June 2025.
- Lighting upgrades within the Lewis Yarluperka O'Brien Reserve, with new spotlights installed beneath feature trees and linked to a new control board, enhancing evening amenity and safety.
- Mulching and landscaping maintenance across garden beds in public reserves, with organic mulch applied in March 2025 and a commitment to ongoing maintenance to a high standard.
- Footpath repairs within the reserve areas, addressing erosion and uneven surfaces.
- Ongoing verge maintenance consultations, with options offered to residents including council-led maintenance, self-maintenance, or conversion to parking, and feedback being incorporated into a long-term verge improvement plan.
- Public consultation on the barbecue and shelter at Lewis Yarluperka O'Brien Reserve, with feedback helping shape Council's decision to retain the current location and informing plans for future amenity upgrades.
- Responsive parking, with patrols and enforcement regularly conducted, to address safety or urgent concerns such as illegal parking.
- Ongoing negotiations with the developer to ensure that all infrastructure meets required standards before formal handover, in order to minimise any future burden on ratepayers.

These initiatives reflect Council's proactive approach to community engagement and responsive local service delivery. Council has worked closely with Hamilton Hill residents—holding consultations, conducting site works, and updating local infrastructure.

More broadly, residents in the Adelaide Hills Council, including the Affected Areas, benefit from a region-wide network of community services, including access to several libraries and community centres, community transport for eligible residents, and support through the Commonwealth Home Support Program.⁵

Adelaide Hills Council is also a national award-winner for its disaster resilience work, delivering preparedness programs and emergency management in close collaboration with CFS and other partners.⁶ These programs reflect the bushfire and flood risks in the area and have been developed through lived experience, including the Cudlee Creek and Cherry Gardens bushfires.

In contrast, there is no compelling evidence that Campbelltown City Council would be able to deliver these services more effectively—or maintain the level

⁵ Seniors • Adelaide Hills Council

⁶ Hills program wins national Resilience Award • Adelaide Hills Council

of responsiveness and contextual knowledge that Adelaide Hills Council has cultivated. Campbelltown's service model is suited to a compact, urbanised setting and lacks the structures or experience to manage the delivery challenges presented by a dispersed, bushfire-prone foothills community.

For Campbelltown to deliver comparable services, it would require significant investment in skilling up staff, establishing new operational procedures, and developing local knowledge and networks—none of which currently exist within its urban service delivery framework. It is therefore highly questionable whether Campbelltown City Council could maintain, let alone improve, upon the level of tailored support and bushfire preparedness that Adelaide Hills Council currently provides.

In short, Adelaide Hills Council has proven its ability to serve this area with care, flexibility, and place-based expertise. The proposed boundary change would replace this with a more centralised model, likely to be less attuned to the needs of foothills residents and less equipped to address the risks and complexities of the local environment.

5. Section 26(1)(c) (v)

“a council should facilitate effective planning and development within an area, and be constituted with respect to an area that can be promoted on a coherent basis;”

Adelaide Hills Council's planning framework, including Township Masterplans and Design Guidelines⁷, and the state-wide Planning and Design Code⁸, is designed to preserve the semi-rural character, environmental values, and landscape integrity of the Hills. This approach reflects long-standing community expectations and aligns with the strategic directions set out in the GARP.

In contrast, Campbelltown City Council operates under a more urbanised planning model that prioritises higher-density development—an approach that, while appropriate for inner metropolitan suburbs, is poorly suited to the distinctive landscape and amenity of the Affected Area.

For example, even where the same planning zone applies—such as the Hills Neighbourhood Zone—the policy intent and implementation differ significantly. Subdivision densities permitted in Campbelltown City Council are up to twice those permitted by Adelaide Hills Council under the same zone, as shown in Table 2 below, illustrating fundamentally different approaches to growth and land use.

⁷ [Urban Centre and Township Projects • Adelaide Hills Council](#)

⁸ [Planning and Design Code • Adelaide Hills Council](#)

Table 2: Comparison of Hill Neighbourhood Zone Planning Rules

| 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 ² | 500m ² |
| Minimum Site Area (Semi-Detached) | 850m ² | 500m ² |
| Maximum building height | 8 metres | 8.5 metres |

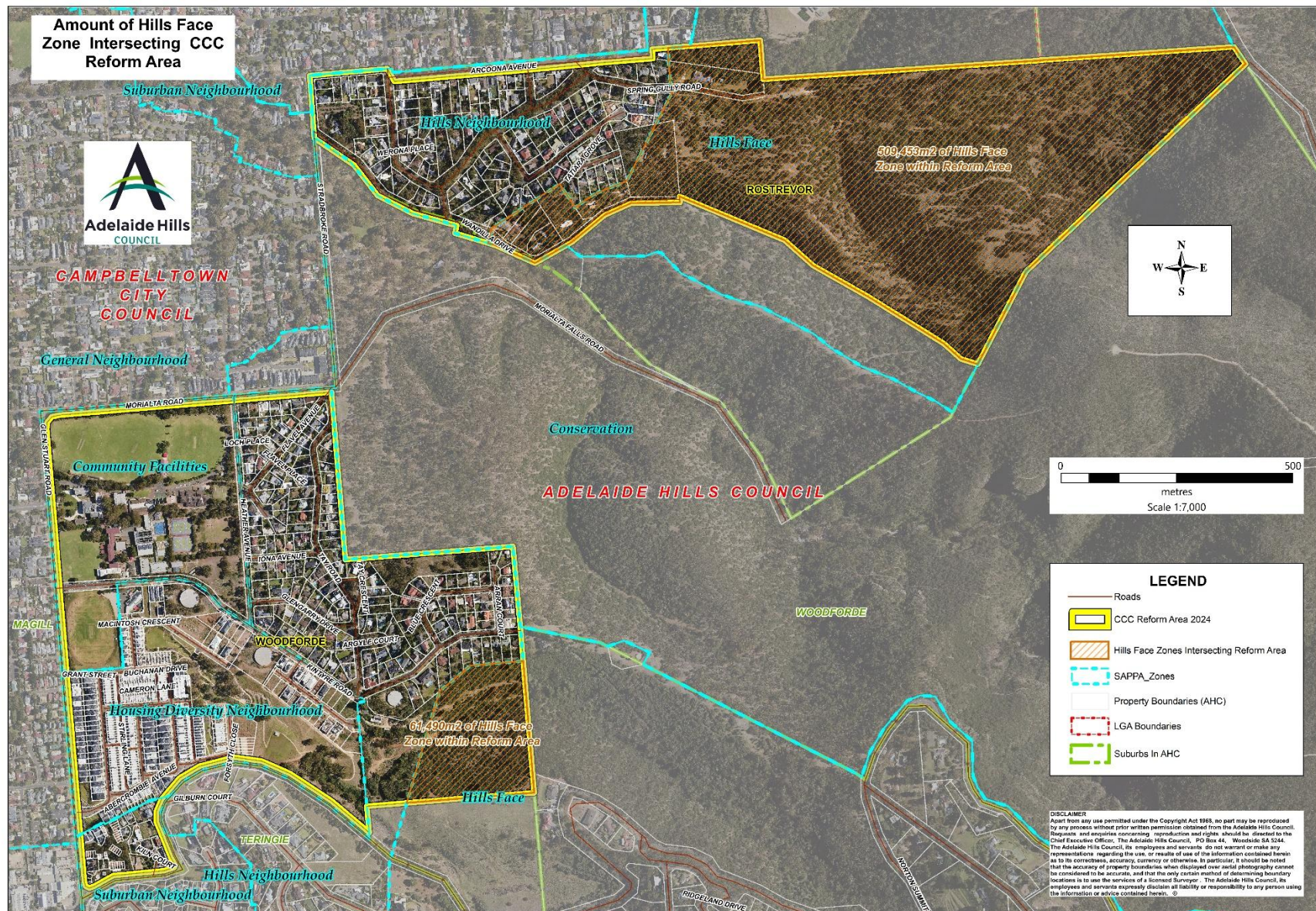
While a change in council boundary does not automatically trigger rezoning, the proposed transfer would introduce a planning anomaly where a contiguous zone within the same council has different subdivision rules. If the Affected Area is brought into Campbelltown City Council, there is a risk that future authorities may seek to resolve this inconsistency through higher-density zoning. This risk is compounded by Campbelltown City Council's assertion in its proposal that these areas are already perceived as part of its suburban footprint, further undermining the foothills character that Adelaide Hills Council has worked to preserve.

In addition to this zoning disparity, the proposal includes significant areas of land zoned as Hills Face Zone—a protected planning designation intended to preserve the natural character, biodiversity, and visual amenity of the Mount Lofty Ranges foothills.⁹ This zone is designed to prevent inappropriate development, manage bushfire risk, and protect the scenic landscape that frames metropolitan Adelaide.

Mapping shows that the proposed reform area intersects with over 570,000 m² of Hills Face Zone land—509,453m² in Rostrevor and 61,490m² in Woodforde (see Map 1 below). This represents a substantial encroachment into one of South Australia's most significant planning zones.

⁹ Guide to the Planning and Design Code, pg. 94

Map 1: Amount of Hills Face Zone in the Affected Areas



Source: Adelaide Hills Mapping

Transferring this land to a metropolitan council governed by urban development priorities presents an unacceptable risk to its long-term protection.

Even if the zoning remains unchanged in the short term, this administrative shift introduces long-term pressure for future rezoning to enable infill development or infrastructure expansion, fragmented governance over natural corridors and fire management, weakening of community expectations about landscape preservation.

Adelaide Hills Council has a long-standing commitment to managing these landscapes with appropriate sensitivity, supported by on-ground experience in bushfire response, environmental stewardship, and engagement with landholders in rural interface areas.

By contrast, Campbelltown City Council lacks experience managing land of this nature. Its planning policies and service delivery structures are tailored to urban environments and are not fit-for-purpose in managing high-risk bushland or steep terrain.

6. Section 26(1)(c) (vi)

“a council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes;”

The Adelaide Hills Council has a long and focused history of protecting the natural environment and promoting sustainable development outcomes tailored to the unique character of the Adelaide Hills. This commitment is supported by a suite of strategic policies, and initiatives, such as the Cox Creek Restoration Project¹⁰ and various Biodiversity Partnership Projects¹¹, that reflect the region’s landscape, biodiversity, fire risk, and community values.

The Council’s commitment to environmental stewardship is reflected in initiatives such as its Biodiversity Strategy¹² and large number of sustainability programs.¹³ These are complemented by a dedicated approach to community engagement, as demonstrated by regular and consistent contact with residents in Teringie, Woodforde, and Rostrevor.

Residents in the Affected Area, including Hamilton Hill and the surrounding foothills, benefit from this dedicated place-based approach. While Hamilton Hill is more densely developed than other parts of Adelaide Hills Council, it is still subject to a coherent and environmentally conscious planning framework—one that balances development opportunities with the need to protect landscape character, ecological corridors, and visual amenity.

The proposed boundary change risks undermining this integrated system. Campbelltown City Council operates within a metropolitan context, with different planning pressures, zoning expectations, and development priorities.

In short, the proposal introduces unnecessary complexity and environmental risk. It seeks to disrupt a carefully considered, well-integrated land use and environmental planning system with a model that is not fit for the foothills

¹⁰ [Cox Creek Restoration Project • Adelaide Hills Council](#)

¹¹ [Biodiversity Partnership Projects • Adelaide Hills Council](#)

¹² [Adelaide Hills Council Biodiversity Strategy](#)

¹³ [Sustainability Actions • Adelaide Hills Council](#)

context. Sustainable development and environmental stewardship in this area depends on continuity, not change.

7. Section 26(1)(c) (vii)

“a council should reflect communities of interest of an economic, recreational, social, regional or other kind, and be consistent with community structures, values, expectations and aspirations;”

The communities within the Affected Area form a cohesive foothills community alongside Teringie. Together, these suburbs share a strong social, cultural, and environmental identity that is more aligned with the Adelaide Hills, not the inner-metropolitan character of Campbelltown.

This community of interest is based on more than just geography. It reflects shared values such as the preservation of native bushland, bushfire resilience, low-density development, and sustainable living. In our view, these values are far more important than where a resident in the boundary change area does their shopping or which roads they travel on to go to work.

Boundary change area residents engage in Hills-based community events, volunteer networks, and environmental initiatives, and they rely on council services that have been designed specifically for a semi-rural setting.

A 2024 foothills community forum hosted by Adelaide Hills Council reinforced this sense of shared identity, with residents of Rostrevor, Woodforde and Teringie expressing common concerns, aspirations, and a commitment to the distinctive character of the hills.¹⁴

The proposed boundary change would artificially split this community. Rostrevor and Woodforde would be removed from the Adelaide Hills Council and placed within Campbelltown City Council, while Teringie, despite its obvious connection, would be left behind. This would result in Teringie being administratively and politically isolated from its natural community of interest, disrupting shared service delivery, bushfire preparedness efforts, and long-standing social connections.

Moreover, the City of Campbelltown’s argument that the Affected Area shares a community of interest with Campbelltown relies heavily on outdated models of community, drawing on decades-old definitions tied to physical proximity, retail activity, and historic boundaries. These definitions are no longer fit-for-purpose. In today’s context, communities of interest are shaped by both place-based identity and shared values, expectations and aspirations—not by where people do their banking, play sport or shop for groceries.

The values, expectations and aspirations of foothills residents include:

- Preservation of the natural environment and biodiversity
- Low-density, environmentally sensitive development
- A strong sense of local identity and community networks
- Bushfire preparedness and resilience
- Planning approaches that reflect semi-rural living

These values cannot be easily replicated or maintained under a different governance model.

¹⁴ [Community Forum Outcomes Report April 2024](#)

To subsume these communities into the City of Campbelltown would be to impose a metropolitan identity to the area, that is fundamentally at odds with local values and expectations. Campbelltown City Council’s urban planning priorities, service delivery models, and community culture are shaped by a densely populated, inner-suburban context—not the semi-rural, environmentally sensitive, and community-driven ethos of these foothills communities.

8. Section 26(1)(c) (viii)

“a council area should incorporate or promote an accessible centre (or centres) for local administration and services;”

The Adelaide Hills Council delivers on this principle through a decentralised and community-embedded service model designed specifically to suit its large and geographically diverse council area—approximately 795 square kilometres with a population of approximately 40,000¹⁵. This model is essential for providing equitable access across a region that includes both townships and rural communities.

Adelaide Hills Council maintains multiple community centres and libraries in towns such as Stirling, Aldgate, Gumeracha, Woodside, Lobethal, and Norton Summit. These facilities are more than administrative points—they act as trusted local hubs, staffed by officers who understand their communities and provide services tailored to local needs. This fosters strong relationships, trust, and a high level of engagement.

In contrast, Campbelltown City Council, covering a much smaller and densely urban area of approximately 24 square kilometres with a population of approximately 58,000¹⁶, operates a centralised service model focused around a single administrative centre. This model suits Campbelltown City Council’s compact geography and higher population density, but it is not transferable to a semi-rural, dispersed council area like the Adelaide Hills Council.

Under Adelaide Hills Council’s model, many townships and suburbs are further away from Council “offices” or community centres than suburbs in Campbelltown City Council. Woodforde and Rostrevor are not unique when taking into account the whole of Adelaide Hills Council.

It’s important to note that proximity to a council service centre does not equate to better services or functional accessibility. Accepting proximity as a primary factor for boundary adjustments sets a concerning precedent. If this logic were applied consistently, numerous fringe suburbs across various councils will become subject to similar proposals, leading to continuous and potentially disruptive boundary reconfigurations to the detriment to semi-rural councils. Such an approach undermines the stability and integrity of established local governance structures.

9. Section 26(1)(c) (ix)

“the importance within the scheme of local government to ensure that local communities within large council areas can participate effectively in decisions about local matters;”

¹⁵ [Adelaide Hills Council | Local Councils](#)

¹⁶ [Home | Campbelltown City Council | Community profile](#)

Adelaide Hills Council maintains a strong, well-established culture of inclusive community engagement, ensuring that all residents—regardless of location—can meaningfully participate in decisions on local matters.¹⁷

The Council's decentralised, community-embedded service model has been carefully designed to support geographically dispersed and environmentally sensitive areas like the foothills. This approach is actively resourced, coordinated, and supported at both the strategic and operational levels.

Council employs a dedicated Community Engagement Coordinator who leads the development, delivery, and evaluation of engagement processes across the district. This role ensures that community engagement is not only routine but integrated into Council planning, policy development, and service delivery. It also ensures consistency with Council's Public Consultation Policy¹⁸, which outlines a clear and transparent framework for engaging the community on significant decisions, in accordance with Section 50 of the Act.

Council's policy outlines a strong commitment to early engagement, accessibility, and closing the loop with stakeholders. The policy ensures that engagement is scaled appropriately to the significance of the matter and the likely impact on the community. It also provides clear methods for notification, feedback collection, and reporting back, supporting meaningful and democratic participation.

This broader framework is delivered through:

- Hills Voice: Community Engagement Hub¹⁹ – an online platform where residents register, specify their townships and interests, and contribute ideas, surveys, discussion forums, and polls on a wide range of topics, including development plans, environmental strategies, and infrastructure projects
- Community forums – in-person meetings where residents can speak directly with elected members and staff about local priorities
- Support for resident and community associations – over 700 active community groups engage with Council, and these associations serve as vital conduits for local voices and concerns
- Participatory Planning Processes – Council undertakes extensive consultation for strategic plans, the Annual Business Plan, and policies
- Transparent, multi-channel communication – regular e-newsletters, social media, and media releases ensure residents are informed about projects, decisions, and how their feedback has shaped outcomes
- Customer experience surveys – Council actively seeks feedback following phone and issue requests to continuously improve service delivery

This comprehensive approach ensures that all Adelaide Hill Council residents – including foothills residents—have multiple, accessible pathways to engage with Council and shape Council decisions. Community sentiment is not just acknowledged—it is embedded into decision-making.

¹⁷ Consultations and Engagement • Adelaide Hills Council

¹⁸ Public Consultation Policy - Adelaide Hills Council

¹⁹ Community Engagement Hub

By contrast, Campbelltown City Council's claim that Adelaide Hills residents "have no say" is false. Their own Public Consultation Policy extends engagement to anyone "who lives, studies, conducts business in, or who visits, use or enjoy the services, facilities and public places of the City of Campbelltown."²⁰

Adelaide Hills residents are already entitled to participate in Campbelltown's Annual Business Plan, budget consultations, and service proposals, via online submissions, written forms, or by attending Council meetings. There is no restriction on their involvement.

A boundary change is not required to provide Adelaide Hills Council residents with a voice. They already have the opportunity to engage with Campbelltown City Council on matters of mutual interest, just as they do with their own Council.

What they risk losing, if transferred, is the high-trust, place-based model of community governance that Adelaide Hills Council has built over time and refined through experience.

10. Section 26(1)(c) (xi)

"residents should receive adequate and fair representation within the local government system, while over-representation in comparison with councils of a similar size and type should be avoided (at least in the longer term);"

Under the current arrangements, residents in the Affected Area, and across the wider Adelaide Hills, enjoy fair, proportionate, and locally responsive representation within the Adelaide Hills Council (see Table 3).

Table 3: Elector numbers and ratios for the existing wards

| Ward | Crs | H of A Roll | Council Roll | Total Electors | Elector Ratio | % Variance |
|----------------|-----------|---------------|--------------|----------------|----------------|------------|
| Ranges | 7 | 18,455 | 9 | 18,464 | 1:2,637 | +2.49 |
| Valleys | 5 | 12,413 | 9 | 12,422 | 1:2,484 | - 3.46 |
| Total | 12 | 30,868 | 18 | 30,886 | | |
| Average | | | | | 1:2,574 | |

Source: Electoral Commission SA (31st January 2025)

Elected members are accessible, engaged, and attuned to the specific needs and values of their communities. This is particularly important in a semi-rural council like the Adelaide Hills Council, where geographic diversity and local context require a more nuanced and place-based approach to representation.

In accordance with Section 12 of the Act, Council has recently prepared a Representation Review Report, which outlines proposed changes to the Council's composition and ward structure (see Table 4). The proposed model aims to further enhance representation and responsiveness across the district. The report is currently under review by the Electoral Commissioner, who will assess its compliance with legislative requirements ahead of implementation at the next local government elections in November 2026.

²⁰ Public Consultation Policy - Campbelltown City Council

Table 4: Elector distribution between proposed wards

| Ward | Councillors | Electors | Elector Ratio | % Variance |
|---------|-------------|----------|---------------|------------|
| Ward 1 | 4 | 9,870 | 1:2,468 | -3.10 |
| Ward 2 | 4 | 10,247 | 1:2,562 | +0.60 |
| Ward 3 | 4 | 10,440 | 1:2,610 | +2.50 |
| Total | 12 | 30,557 | | |
| Average | | | 1:2,546 | |

Source: Electoral Commission SA, House of Assembly Roll (8th April 2025)
Council Voter's Roll (June 2024)

Adelaide Hills Council's current structure is consistent with that of other councils of similar size and population. With twelve councillors and a Mayor representing approximately 30,886 electors across a large and diverse area, Adelaide Hills Council maintains an elector-to-councillor ratio comparable to councils such as Burnside, Holdfast Bay, and Unley (see Table 5).

Table 5: Elector representation – Metropolitan councils

| Council | Councillors | Electors | Elector Ratio |
|--|-------------|----------|---------------|
| Walkerville (1.34 km ²) | 8 | 5,841 | 1: 743 |
| Prospect (7.81 km ²) | 8 | 15,217 | 1:1,902 |
| Gawler (41.10km ²) | 10 | 20,667 | 1:2,067 |
| Norwood Payneham & St Peters (15.1 km ²) | 13 | 26,079 | 1:2,006 |
| Unley (14.29 km ²) | 12 | 28,048 | 1:2,337 |
| Holdfast Bay (13.72 km ²) | 12 | 28,835 | 1:2,403 |
| Adelaide Hills (795.1 km ²) | 12 | 30,886 | 1:2,574 |
| Burnside (27.53 km ²) | 12 | 32,508 | 1:2,709 |
| West Torrens (37.07 km ²) | 14 | 43,290 | 1:3,092 |
| Adelaide (15.57 km ²) | 9 | 30,587 | 1:3,399 |
| Campbelltown (24.35 km ²) | 10 | 37,336 | 1:3,734 |
| Mitcham (75.55 km ²) | 12 | 49,896 | 1:4,158 |
| Playford (344.9 km ²) | 15 | 73,966 | 1:4,931 |
| Port Adelaide/Enfield (97.0 km ²) | 17 | 90,918 | 1:5,348 |
| Charles Sturt (52.14 km ²) | 16 | 91,087 | 1:5,693 |
| Marion (55.5km ²) | 12 | 68,627 | 1:5,719 |
| Tea Tree Gully (95.2 km ²) | 12 | 74,756 | 1:6,230 |
| Salisbury (158.1 km ²) | 14 | 98,609 | 1:7,044 |
| Onkaparinga (518.4 km ²) | 12 | 134,557 | 1:11,213 |

Source: Electoral Commission SA (31 January 2025)
* City of Adelaide also comprises two (2) "area councillors".

This structure ensures fair and effective governance without over-representation. Moreover, it supports strong local engagement and reflects the distinct communities of interest within the Adelaide Hills district.

There is no evidence that the Affected Areas would receive improved representation under Campbelltown City Council. On the contrary, if the proposal proceeds, they risk becoming a minority within a larger, urban-focused ward, reducing their influence on council decisions.

Additionally, the tailored advocacy currently provided by Adelaide Hills Council—on matters such as bushfire preparedness, environmental protection,

and rural infrastructure—may not be sustained under Campbelltown’s governance. These issues are less likely to feature prominently in a council where the majority of ratepayers live in a high-density urban context, and where semi-rural needs are not a primary concern.

11. Section 26(1)(c) (xii)

“a scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils’ capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change;”

The Adelaide Hills Council has a strong track record of regional collaboration, working constructively with neighbouring councils to deliver coordinate planning, and address cross-boundary challenges. This cooperative approach reflects a mature and forward-thinking model of local governance, where councils retain their identity and community focus while leveraging collective capacity for greater efficiency and impact.

Examples of Adelaide Hills Council’s regional collaboration include:

- Joint delivery of business support events for First Nations businesses in partnership with Mount Barker District Council, Alexandrina Council, and the Circle First Nations Entrepreneur Hub.
- Ongoing cooperation with Mount Barker District Council through the Adelaide Hills Reconciliation Working Group, which provides shared advice on reconciliation matters and the development of each Council’s Reconciliation Action Plan²¹
- Shared emergency management planning, particularly in bushfire preparedness, where coordination with neighbouring councils and state agencies is essential.
- Regional tourism strategies, which promote the Adelaide Hills as a unified destination while respecting the distinct character of each local area.
- Active membership in the Southern and Hills Local Government Association, which facilitates strategic collaboration on regional issues such as transport planning, waste management, and environmental sustainability across member councils.

These partnerships demonstrate that structural boundary change is not the only—or the best—path to improved service delivery. In fact, forced boundary changes can disrupt existing collaborations, create administrative inefficiencies during transition, and erode the trust and goodwill that underpin successful regional governance.

Moreover, regional collaboration allows councils to tailor services to local needs while still achieving the benefits of scale. This is particularly important in areas like the Adelaide Hills, where local identity, environmental sensitivity, and community engagement are central to effective governance.

In contrast, the proposed boundary change offers no clear evidence that it would improve service delivery or regional coordination. On the contrary, it

²¹ [Reconciliation-Action-Plan-2025.pdf](#)

risks fragmenting existing partnerships and replacing a cooperative model with a more centralised, less flexible structure.

In summary, Adelaide Hills Council's commitment to regional collaboration already delivers many of the benefits that structural boundary reform seeks to achieve—without the disruption, cost, and community dislocation that boundary changes entail.

3. Assessment against Section 31 (3) (b) of the *Local Government Act* 1999

Section 31(3)(b) of the Act outlines a set of statutory considerations that must be examined during an inquiry into a general boundary change proposal. These include financial and resource impacts on affected councils, levels of community and council support, and implications for council employees.

This section provides Adelaide Hills Council's assessment of the proposal against each of these required considerations. The Council's analysis is based on available information and reflects its understanding of the likely implications for both its own operations and the broader community. In presenting this assessment, the Council seeks to support the Commission's inquiry by contributing local context and insights into how the proposal may affect the affected area in practice.

1. Section 31(3)(b) (i)

“the financial implications and impact on resources that the general proposal is likely to have on any council affected by the general proposal”

The proposed boundary change would impose significant and lasting financial burdens on the Adelaide Hills Council with no clear evidence of benefits for their respective communities.

For the Adelaide Hills Council this would mean the removal of over 700 properties would reduce Council's rate base by approximately 3.76 percent, representing a substantial loss of annual revenue.

2. Section 31(3)(b) (ii)

“the extent of support for the general proposal (in particular) and boundary reform in the area (in a general sense) within the community affected by the general proposal”

It is Adelaide Hills Council's submission that all of the Adelaide Hills Council area will be affected by any boundary change proposal and the views of all those in the Council area should be taken into account when assessing the proposal.

A survey conducted by the Adelaide Hills Council found that approximately 65 per cent of respondents opposed the boundary change. This is not a marginal result—it represents a clear majority expressing a strong preference to remain within the Adelaide Hills Council.

This widespread opposition reflects more than just a resistance to change. It signals a deep connection to the Adelaide Hills community, a desire to retain the current model of local governance, and a lack of confidence that the proposed change would deliver meaningful benefits.

To proceed with a boundary change in the face of such clear opposition would undermine the democratic principles that underpin local government. It would erode trust in the reform process and set a troubling precedent for future proposals that disregard community sentiment.

3. Section 31(3)(b) (iii)

“the extent of support for the general proposal of any council affected by the general proposal”

The Adelaide Hills Council has consistently and formally opposed the proposed boundary change since it was first raised. Adelaide Hills Council’s position reflects its assessment that the proposal would be detrimental to its residents in the affected area and the financial sustainability, community identity, and service delivery capacity of Adelaide Hills Council.

Importantly, there is no evidence of support from other affected councils or regional stakeholders. The Campbelltown City Council has not demonstrated broad-based support from its own community or from neighbouring councils. Nor has it provided compelling evidence that the change would deliver net benefits to the region.

This lack of support is critical. Boundary reform should be based on collaboration, shared vision, and mutual benefit—not unilateral proposals that disrupt established governance arrangements and community ties. The absence of regional consensus suggests that the proposal is not grounded in a cooperative or strategic approach to local government reform.

4. Section 31(3)(b) (iv)

“the impact on the various rights and interests of any council employees affected by the general proposal”

Council employees in the Adelaide Hills Council have developed deep local knowledge and long-standing relationships with the communities they serve. This is especially critical in areas such as:

- Home care and community support, where trust, familiarity, and continuity of care are essential.
- Infrastructure and asset maintenance, where understanding the unique topography, bushfire risk, and environmental sensitivities of the Hills is vital for effective service delivery.

Transferring these responsibilities to the Campbelltown City Council could result in:

- Disruption to service delivery, particularly during the transition period.
- Reduced responsiveness and effectiveness, as new staff may lack the local context and relationships that underpin high-quality service.

4. Conclusion

Adelaide Hills Council submits that the Campbelltown City Council boundary change proposal does not meet the statutory criteria outlined in the *Local Government Act 1999*. It fails to present a compelling, evidence-based case for reform and poses substantial risks to local governance, financial sustainability, service delivery, and community identity.

The proposal lacks community support, disrupts a well-functioning service model, and would significantly reduce Adelaide Hills Council's rate base, placing increased financial pressure on the remaining ratepayers and compromising the Council's long-term ability to maintain service levels and deliver infrastructure across the district.

This supplementary submission reinforces Council's position with clear evidence of its ongoing investment in the Affected Area, including Hamilton Hill. From infrastructure upgrades and reserve improvements to traffic safety works and active engagement with residents, Council has demonstrated its commitment to responsive and place-appropriate service delivery.

Importantly, the approval of this proposal would set an undesirable precedent—potentially encouraging further boundary change proposals from metropolitan councils to take areas away from semi-rural councils, based on proximity or administrative preference, rather than the long-term interests of communities.

Adelaide Hills Council respectfully urges the Inquirers to reject the proposal and consider the broader implications for regional collaboration, community representation, and the stability of South Australia's local government system.

We thank the Inquirers for the opportunity to provide further input and remain available for any further clarification or engagement as required.



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

ahc.sa.gov.au



Adelaide Hills
COUNCIL