

Attachment B

Consultation Report: Naming Policy

Consultation report: Naming policy

Consultation overview and background

Between 16 December 2022 to 27 February 2023 the City consulted the community on our revised naming policy.

Our updated naming policy provides clear direction for the naming of suburbs, roads, parks, open spaces, places and buildings that are owned, operated or managed by the City of Sydney. It was reviewed to ensure it aligns with current state government legislation, policy and principles.

This report documents the content of the submissions received and outlines activities undertaken to support the consultation.

Purpose of the consultation

The purpose of the engagement was to:

- inform the community about this policy and seek feedback on the draft
 - ensure that naming principles meet legislative requirements and policies (*NSW Aboriginal Languages Act 2017*, NSW Geographical Names Board policies).
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Targeted Stakeholder Engagement

The City emailed 38 key stakeholders seeking feedback on the draft policy. These stakeholders included government agencies, neighbouring councils, local history groups, the Geographical Names Board of New South Wales, Metropolitan Local Aboriginal Land Council and the City's Aboriginal and Torres Strait Islander advisory panel.

Outcomes from the consultation

We received a total of 11 submissions during the consultation period, of these submissions:

- 9 submissions were received via online survey
- 2 submissions received via email

This includes a submission from the Geographical Names Board of New South Wales.

All submissions are shown in the table below.

Submission tables

Submission by the NSW Geographical Names Board

The City consulted the NSW GNB in the process to develop the policy. They then closely reviewed the draft policy during the exhibition period and provided detailed feedback to ensure it is alignment with the NSW GNB policies.

Issue raised	Submission	City of Sydney response
Scope	GNB - The Surveyor General is one of a number of several parties that may object to a road name.	Removed
Definitions – general	GNB - Could be helpful to provide direct links to the NSW Address Policy and User Manual and the NSW Place Naming Policy.	Insert links
Definitions – Assigned	GNB - Geographical name in terms of the Geographical Names Act 1966, approved endorsed and gazetted by the Geographical Names Board.	Amend
Definitions – Road Type	GNB - Check reference number - AS/NZS 4819:2011	Checked. Is Correct.
Definitions – Urban Place	GNB - Check whether this is the Act or APUM	Checked. APUM.
Heading - When will a name be allocated or changed?	GNB - Change heading to Naming Proposals	Amend
When a name will be allocated or changed Dot point 6	GNB - Clarify that community support and an assessment must be carried out for considering a change of name because it is considered offensive or inappropriate	Amend

Issue raised	Submission	City of Sydney response
Consideration for changing an existing name	<p>GNB - Specify the different requirements for parks and open spaces versus roads</p> <p>For reserves (from Place Naming Policy):</p> <p>Names chosen for reserves are expected to be enduring, and the renaming of these features is confusing and disruptive and is discouraged. If the renaming of a reserve is proposed, evidence of community support for the name change must be provided. The GNB will then evaluate the merits of the proposal before making a decision.</p> <p>For road names (from NSW Address Policy and User Manual):</p> <p>Road names are intended to be enduring, and the renaming of roads is discouraged unless there are compelling reasons for a change. Issues that can prompt renaming include the redesign of a road, changed traffic flow, mail or service delivery problems, duplication issues and addressing problems.</p>	Amend
General	<p>GNB - Generally throughout the document, there seems to be cross over between Road naming and place naming which may confuse the reader. It may be worth clearly defining through sub-headings when referring to each.</p>	Agree where relevant
Principles	<p>GNB - Should reference complying with GNB policy</p>	<p>Amend intro to say: The following principles are applied by the City when proposing, endorsing and approving names. <i>These principles comply with the NSW GNB policies.</i> Note: there is a principle that addresses this.</p>
4. Aboriginal Language	<p>GNB - Consultation with Aboriginal Community should be a starting point in any naming using Aboriginal Language.</p>	<p>Agree. The policy includes a clear consultation process that must take place prior to proposing any naming that uses Aboriginal language. Also noting that the</p>

Issue raised	Submission	City of Sydney response
		NSW Languages Trust was consulted in developing the policy.
8 Persistence	GNB - For the GNB component there is a two stage process and the GNB doesn't make a final decision rather endorses for Government approval.	Amend wording to include <i>If the NSW GNB approves the proposal to move forward, they will put it on consultation for public comment before the new name can be endorsed.</i>
13. Geographical Names Board Compatibility	GNB - Include two specific policies and links https://www.gnb.nsw.gov.au/__data/assets/pdf_file/0017/220148/GNB_Place_Naming_Policy.pdf https://www.gnb.nsw.gov.au/__data/assets/pdf_file/0004/229216/NSW_Addresses_Policy_and_User_Manual_2021.pdf	Amend as suggested
Aboriginal place naming	GNB - Traditional Aboriginal names can be used for unnamed features – they do not exclusively need to be used as dual names.	Amend as suggest – Aboriginal language for new names, <i>unnamed geographical features</i> and dual naming
Dual Naming	GNB - Make this clearer	Dual Naming officially recognises Aboriginal cultural heritage by registering the original place names used by Aboriginal people for geographical features and cultural sites <i>that have a registered post-invasion name</i> . Dual names Assigned by the Geographical Names Board sit alongside the existing non-Aboriginal name. Include link to GNB information.

Issue raised	Submission	City of Sydney response
Acknowledging Country	GNB - Clarify what this section is – if it is the Acknowledgment of Country for the document, move up.	Retitle to Acknowledging Country on Signage
Responsibilities	GNB - There is no distinction here between road naming and place naming. These points refer to road naming and there is a different process for place naming. Reading through this document, the document seems to go between the two processes without appropriate headings. It may be worth looking at this throughout the document	Agree. Include the two different processes separately

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Individual submissions

Issue raised	Individual / Organisation	Submission	City of Sydney response
General support for policy	Individual	I support this policy. I think it is a well-rounded and balanced approach to naming places in Sydney.	Noted
Support for dual naming or Aboriginal naming	Individual	I approve dual naming as per Linda Scott	Noted
	Individual	Can we please use local indigenous names?	Agreed

Issue raised	Individual / Organisation	Submission	City of Sydney response
Naming of places should consider all backgrounds	Individual	I disagree with the focus on Aboriginal names for places. Aboriginal people only make up a small proportion of the population, and already have an outsized representation in culture and place names relative to the proportion of Australians who are Aboriginal identifying. Names should reflect our whole community, and not give preference to any one racial group, including Aboriginal people. The naming policy should be race neutral and encourage naming of places from people of all backgrounds.	Noted. Diversity addressed in Policy Statement and Principle 3.
Suggest greater consultation with local Aboriginal communities	Individual	Noticed that it said local Aboriginal people would be consulted. It should be local Gadigal Aboriginal people consulted.	Policy stipulates that advice must be sought from the Metropolitan Local Aboriginal Land Council and the City's Aboriginal and Torres Strait Islander advisory panel and ensure appropriate Aboriginal community members are consulted. At this point, our Aboriginal and Torres Strait Islander Cultural Protocols acknowledge the Gadigal as the traditional custodians of Country in our LGA.
	Individual	I support the naming policy. I would however suggest greater consultation with local indigenous groups in both names and acknowledgment of country. The policy suggests that all of Sydney City Council is on Gadigal land. This is incorrect. Most of SCC is on Gameygal Land (south of Cleveland St) or on Wongal land (west of Darling Harbour). The Metropolitan Land Council, in conjunction with Sydney University, undertook a detailed mapping exercise some years ago to better identify indigenous lands across Greater Sydney. Acknowledgment of Country is important. So is acknowledging the correct pre-colonial landownership and indigenous groups.	
Request to review terminology used in policy	Individual	Although I'm not against this, I do take issue with this sentence: <i>'Long before the British invaded and usurped the landscape'</i> If the First Fleet is invasion, what say you about the millions of recently arrived immigrants, are they too, invaders? Where does it end?	Noted

Issue raised	Individual / Organisation	Submission	City of Sydney response
		<p>Is Sydney city as it stands today, a product of 'usurping' the landscape? Are you ashamed of this? Still call it usurping? Where does it end, this name calling?</p> <p>I'm not denying that our history has had a difficult past with the Aboriginal people. In fact, hasn't there been many official apologies for what had occurred?</p> <p>My Australian ancestors helped build a wonderful country that readily welcomes others. To be frank, I'm tired of the use of the word 'invasion' or 'invaders' to describe my Australian ancestors. That is so negative and shows no ability to appreciate the many amazing aspects of Australian history with its pioneers who with great courage and tenacity, overcame huge odds to bequeath us a wonderful country, I call home, Australia.</p> <p>I would appreciate a review on the use of the words 'invade' and 'usurp' and ideally to be far more neutral in tone than what it is now.</p>	
	Individual	I am not sure that the Context paragraph that discusses a British 'invasion' is recognised Government policy, and doesn't seem to appear on NSW or Australian government policies. This paragraph should be deleted/amended. It detracts from an otherwise worthwhile document.	The term 'invasion' has been used by the City Council since 2012, see City of Sydney Aboriginal and Torres Strait Islander Cultural Protocols (2012)
Does not support policy	Individual	A total and irresponsible waste of tax payers' money.	Noted

Issue raised	Individual / Organisation	Submission	City of Sydney response
Comments out of scope	Individual	The most urgent strategy is for Sydney City Council to commit to Net Zero by 2030. It's embarrassing that the Council is currently lagging behind in it's ambition with It's conservative attitude to the climate emergency. Planting and protecting trees, as important as it is, won't stop the climatic events we're witnessing already. Time for Council to be brave, at least in regards to climate policy. Young Sydney residents won't put up with the current glacial pace of policy progress.	Noted

Activities to support the consultation

Sydney Your Say webpage and survey

- The webpage and survey were open for feedback from 16 December 2022 to 27 February 2023.
- It received 255 unique page views and 59 document downloads during this period.

Stakeholder email notification

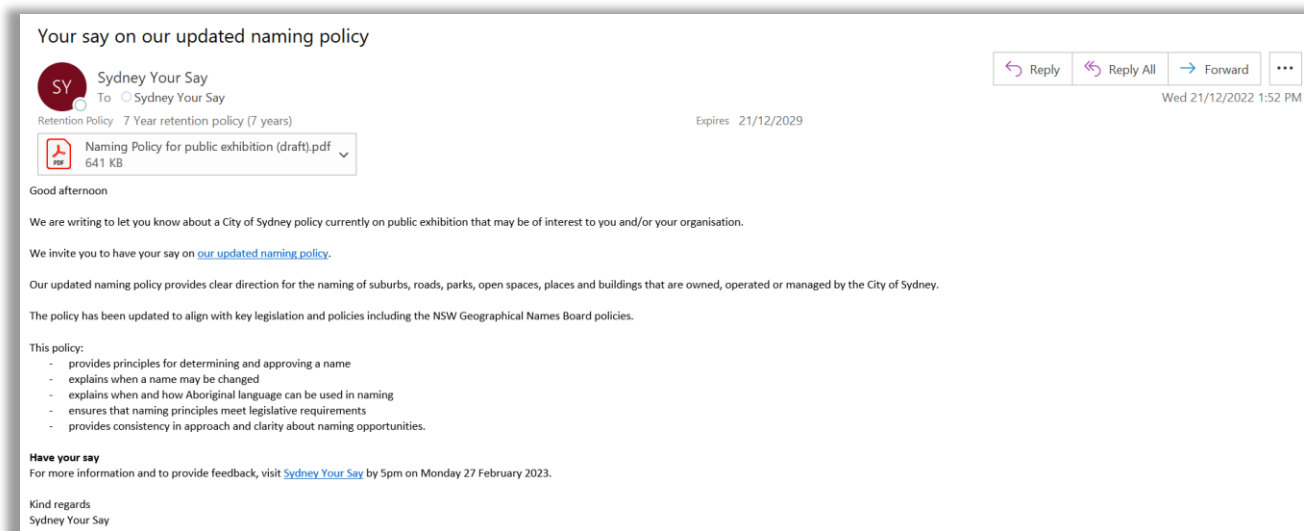
- Stakeholder email sent on 21 December 2022 to organisations and individuals who may have an interest in this consultation (see below).
- This was sent to 38 stakeholders, which included government agencies, neighbouring councils, local history groups, the Geographical Names Board, Metropolitan Local Aboriginal Land Council and the City's Aboriginal and Torres Strait Islander advisory panel.

E-news

- Included in two editions of Sydney Your Say e-newsletter (see below)
 - December 2022 – sent 16 December to 7,050 subscribers
 - January 2023 – sent 17 January to 7,021 subscribers

Communications

Stakeholder email notification



Sydney Your Say e-news item



Your say on our updated naming policy

We've reviewed our naming policy to ensure it aligns with state government legislation, policy and principles. Our updated naming policy provides clear direction for the naming of suburbs, roads, parks, open spaces, places and buildings the City of Sydney owns, operates or manages.

Consultation closes Monday 27 February.

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