
From: shirley rowe <[REDACTED]>
Sent: Thursday, 20 September 2018 10:14 PM
To: DPTI:Planning Engagement
Subject: Comments on aspects of the draft State Planning Policies

Follow Up Flag: Follow up
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To Whom It May Concern:

1. I am concerned that the Planning and Design Code lacks real detail – it is a very nice looking document with broad statements at a high level. Where are the details that will provide the actual rules that planners will have to consider for compliance? When will these details be made available for public comment?

2. Cultural Heritage

2.1 In para 2 of the following Non-statutory Guidance Notes, I think the Planning and Design Code should have the word 'must' instead of 'may'. The word 'may' weakens the Code in respect of heritage places in current and future listings.

State Planning Policy 7 : Cultural Heritage, Page 38

Non-statutory Guidance Notes

Regional Plans should implement state policies by recognising and supporting the appropriate conservation of areas and places of cultural heritage significance.

The Planning and Design Code should implement state policies by identifying areas and places of national, state and local heritage value and may include the identification of places or items, including the extent of their cultural heritage significance. The first version of the Code will incorporate the existing state and local heritage items currently listed in Development Plans.

The Code will include a state interest Overlay that identifies places and areas of Commonwealth and state heritage value, with appropriate referrals to the Commonwealth and state agencies responsible for heritage protection.

Related SPPs

- *Design Quality*
- *Adaptive Reuse*
- *Housing Supply and Diversity*

Related legislation and instruments

- *Heritage Places Act 1993*
- *Aboriginal Heritage Act 1988*

2.2 I also offered a submission regarding the Local Heritage Reforms discussion paper on 29/9/16 which I repeat now because the issues mentioned are still a concern :

I'm concerned about the wording on pages 5 and 7 of the Local Heritage Discussion Paper :

Page 5 – “The listing of local heritage places will also need to be considered in balance with the broad strategic objectives of the State.”

Who makes this judgement? This could become very politically motivated and be open to many variables and no certainty.

Page 7 - “Another improvement could involve considering the demolition of local heritage places ‘on merit’.”

Who decides the merit of demolition? Is it the developer? Who does the developer have to convince of the ‘merit’? Will the merit be based on the mantra of jobs, jobs, jobs???? Once the jobs have gone, the community is left with another unnecessary tower block.

Page 7 “There could also be opportunities for accredited heritage professionals to provide the heritage equivalent of a current Building Rules Consent Only, where, on balance, their judgements reveal that a full assessment is not warranted in relation to internal alterations.”

The wording above appears to be a good idea to help the process of consent if it means heritage buildings could be modified in a reasonable manner to make them economically viable.

2.3 I live in a local heritage listed property in Kensington within a small street of similarly listed houses. Once the fabric of heritage buildings is gone, there is no way of getting it back. All the major cities of the world value their built heritage and tourists flock to these cities because of the history and architecture. Don't let Adelaide become another Sydney of boring towers, little greenery and no history. Please don't succumb to developers' wishes at the monumental cost of losing one's history of place.

2.4 Are the paragraphs from the Local Heritage Reforms discussion paper, as listed above, going to be incorporated in the Planning and Design Code?

2.5 Will the Minister still have the power to de-list heritage listed buildings?

3. Housing Supply and Diversity

“State Planning Policy 6 : Housing Supply and Diversity, P.36

Policies

5. Provide a **permissive** and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.”

3.1 I am concerned about the use of the word ‘permissive’ in this Policy – what meaning does it have in the context of this Policy – does it have the meaning of ‘excessive freedom, non-restrictive’ for example or a legal interpretation of ‘allowed but not obligatory; optional’? What precedence will this policy have over other rules?

3.2 Apartment buildings should have closer access to parks/gardens than provided in this document under Healthy Neighbourhoods, ie 400m walk to a park. Especially applicable if families are expected to live in these buildings. Multi-storey developments should be required to have some greenery/trees included in the development space. It is becoming well known that there is a link between improved mental health when there is a connection to nature.

3.3 I also consider that multi-storey apartment buildings should not be built on northern sides of established residences if it causes interference with the amount of sunshine received by the residents. The needs of current residents should not be overlooked during the planning phase.

3.4 Will residents be informed of impending developments prior to approvals being granted? The current situation is unfair where councils, due to State law disallowing them to do so, don’t inform neighbours. Again, developers have more rights than the people already living in the area.

4. There appears to be a disconnect between the policy on Climate Change (page 31) :
Policies

3. Ensure the development of climate-smart buildings that reduce our demand for water and energy and mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure, **urban greening and tree canopy enhancement**.

and the policy on House Supply and Diversity (page 36)

Policies

5. Provide a permissive and enabling policy environment for housing within residential zones, including the **provision of small lot housing** and aged care accommodation.

How will enough urban greening and tree canopy enhancement be provided when the housing blocks are so small?

Yours faithfully,

Shirley Rowe

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