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Submission in response to:

Vision for South Australia's planning system: State Planning Policies

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When I read high level policies of this nature they present as noble and aspirational, as if the best outcomes are all attainable through their natural progression into development regulation and other instruments of implementation. By the same token, high level policies also gain a fair degree of inbuilt protection, by avoiding the specific, and the sort of conflict that can be generated when development hits the ground. As these high level policies evolve into a development control system, the focus gravitates away from aspiration to the opposite end of the spectrum, such that all development proceeds, unless it is so deficient that it has to be refused. Then the disconnect between expectations of high level policies and what actually happens on the ground becomes a stark reality. The situation can be further worsened when caveats go into the development control system favouring expediency, generic assessment criteria, and opaque behind-the-scenes development approval processing.

I am concerned that such biases have been loaded into the design of the proposed development control system and that they are the sting in the tail of the new planning reforms, by inviting public input into the policy-making discussion, but blocking it at the more contentious development assessment end. By the time the public works out how high level policy delivers on-ground, it is all too late.

A state-wide Planning and Design Code is a sure sign that generic development assessment criteria will be the preferred norm. For people like me who live in a small country town, we are likely to be subjected to development assessment criteria largely standardised for all small country towns. I expect to see that local character and the clear point of difference that sets our town apart from other towns, will be largely ignored by the new system. I further expect that standardised zones and precincts and the like will fail to pick up on the fact that historic towns have an intrinsic mixed pattern of development, and haven't necessarily organised their historic development patterns into neat blocks of commercial development separated from residential development. A planning system that focuses on this style of pigeon-hole tidiness, can destroy the character and fabric of these places. People don't visit towns like mine to admire the workings of a planning system, they visit to enjoy the character and ambiance of organic urban form predating our confected planning system.

I would particularly like these high level policies to better recognise local character and locational point of difference, and the way these elements interface with local identity and the generation of unique local product, expressed in economic activity such as cultural heritage tourism. A development control system looking for pigeon-hole solutions can be a destructive force in this environment. Further, I would like these high level policies to point to the sorts of implementation mechanisms that can produce the best possible development outcomes, rather than simply prune out the worst of the

worst.

page 2

These issues go to the heart of the new planning system, and its propensity to withdraw public scrutiny and performance based assessment at the development control interface. My prediction is that will only serve to create a public storm. The new development control system needs some serious work if it is possess the dexterity required to meet the aspirations of high level policy.

From what I have observed, the “new” planning system is far too heavily encumbered by clumsy old conventions from a pre-digital age. An obsession with the technical convention combining with a cut and paste approach borrowing from other jurisdictions frustrate the potential for an innovative new system...a system that could be information rich, dexterous, transparent, efficient, equitable and adaptable. The simple premise of the system I would promote accepts that planning is little more than a process designed to reconcile opportunities and constraints, but it is the manner in which these are spatially and descriptively represented that plays into the true potential of the digital age. Used properly, this can generate a paradigm shift responsive to all interests invested in the development control system.

Accordingly, this submission advocates for:

1. Greater recognition of the value of local character and point of difference;
2. Acknowledgment that an antiquated system based on zones and precincts for homogeneous categories of land use can fall well short of meeting expectations relating to desirable mixed use environments including the protection of established unique character;
3. A digitally based system founded on the simple notion of reconciling opportunities and constraints, that is information rich, spatially rendered and user friendly;
4. Dexterity in the treatment of site specific requirements, so that inquiry on a single site yields a full understanding of relevant opportunities and constraints and the attendant requirements for how these might be reconciled (like a traffic light system on individual components of a development according to difficulty or sensitivity).

Such an approach serves to maximise digital potential, instead of positioning it as an adjunct to old “manual” style conventions. It can be fashioned to expedite all the safe or non-contentious aspects of a specific development, while focusing subjectivity or challenge only on those aspects where greater scrutiny is justified, and invite the public into that window when and where appropriate. This ensures that a development proposal is only exposed to critical aspects of review, rather than being contestable in its entirety, thereby limiting time and cost related risks.

I present these ideas on a conceptual basis in this submission, but would happily promote their development in an applied form should the opportunity arise.

Des Fowles.
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