

**From:** [Colin Wilson](#)  
**To:** [DPTI:Planning Reform](#)  
**Subject:** FW: continuing submission on Phase 2 of the Draft Planning and Design Code, October 2019  
**Date:** Friday, 29 November 2019 1:08:42 AM

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I have been trying to email this submission without success. Please will you forward it to the appropriate email. Thank you. Beverley Maxwell

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**From:** Colin Wilson [mailto: [REDACTED]]  
**Sent:** Friday, 29 November 2019 12:58 AM  
**To:** 'DPTI.PlanningReformSubmissions@sa.gov.au.'  
**Subject:** continuing submission on Phase 2 of the Draft Planning and Design Code, October 2019

To State Planning Commission

Re: Submission Phase 2 Draft Planning and Design Code

Dear Sir/Madam

This is a continuation of a brief submission I made online on 28/11/10 which ended abruptly before I was able to give more details as to my concerns and I was only able to list them, therefore I would like this information recorded.

#### **General comment on planning consultation**

I felt that the time given for consultation was totally inadequate nor, given the size and complexity of the document was there adequate information given in the sessions that were offered. I attended the one on Kangaroo Island and while there was a briefing about the rationale for the changes and the new planning tool/process that was being developed, there was insufficient information given regarding the current content and proposed changes. Nor, in an island where National Parks and Reserves comprise a significant amount of the land use was there any information explaining changes that are proposed. I understand that a briefing in that regard has been given in Adelaide but at such a late stage in the consultation process that there's insufficient time for that information to be disseminated to the regions.

#### **Climate Change overlay**

Kangaroo Island undertook mapping related to the impacts of climate change therefore there should be an overlay of the climate change mapping for KI.

#### **National Parks and Reserves**

1. Sections of National Parks and Conservation Parks and reserves show as Rural not Conservation – I understand that this has been identified and will be changed but I want to reiterate that this is of major concern.
2. Tourism accommodation development in parks: I am very concerned that the thrust of the changes are based on economic drivers rather than environmental (this is implied in the introduction to the Fact Sheet).
  - I support the aim to apply consistent zoning to parks and reserves.
  - I note that tourist accommodation development within the Conservation zone that has not been 'contemplated' in a Park management plan will be 'Restricted' and go through an assessment process which will include notification by 'notice being placed on the relevant land – does this do away

with the current requirement that changes to the Park management plans must be widely advertised ie through local papers etc and groups who have an interest are notified directly? What guidelines are there relating to 'consultation' and the taking consideration of the views of the public and other stakeholders.? I'm concerned that this will lead to a weakening of the Management Plans for National Parks which are based on environmental priorities. What opportunities are there for public appeal against decisions?

- I note that tourist accommodation development within the Conservation zone that has been 'contemplated' will be Performance Assessed and 'is *likely* (my italics) to include the opportunity for public consultation'. Who makes the decision as to whether the public will be consulted or not? What weight does the public's views have on the assessment process? Is there any right of appeal?
- The definition of 'contemplated' does need to be explicit and any zoning for tourism accommodation within Park Management plans must be explicit. Inexact and vague descriptions leads to the possibility of very broad interpretation of what is intended as is evidenced in the current case in Flinders Chase National Park.
- Visitor Experience Sub-zone – what constraints are there on the amount this can comprise in Parks and reserves and where they are located – can an entire park be allocated as a Victor Experience Sub-zone? Can they be established in Wilderness Protection Areas (WPA) (which would totally negate the purpose of these areas), or won't WPA exist?
- I wish to reiterate that the tourist accommodation and visitor experiences **must** come secondary in National Parks and Reserves and in Conservation zones and Coastal Conservation zones to environmental protection.

### **National and state threatened species protection**

There is no overlay indicating the presence of threatened species or critical habitats which would indicate potential restrictions on development in those areas. Also areas under Heritage legislation while on private land should be indicated as Conservation given the restrictions that are in place regarding developments and vegetation clearance disturbance.

### **Regional Natural Resource Management Plans**

How does the new code relate to the plans that have been developed quite recently with extensive resident and landholder participation and consultation.

Changes to the Planning and Design Code are very important and I wished to participate in the process but I felt very ill-equipped to address the issues due to the short time and limited opportunity to understand the changes that are planned.

Your sincerely

Beverley Maxwell  
Kingscote South Australia

# Consultation Submission Form

**COMPLETE**

**Collector:** Web\_Link\_Prod (Web Link)  
**Started:** Thursday, November 28, 2019 11:40:32 PM  
**Last Modified:** Thursday, November 28, 2019 11:43:10 PM  
**Time Spent:** 00:02:38  
**IP Address:** [REDACTED]

Page 1: Planning and Design Code for South Australia

**Q1** Which part of the Planning and Design Code would you like to make a submission about?(Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)

**My submission relates to Rural code. (click here for council areas)**

Page 2: Planning and Design Code for South AustraliaPersonal Details

**Q2** Please provide your contact details below (Name, Postcode & Email are mandatory)Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name **Beverley Maxwell**  
Postcode **5223**  
Email Address [REDACTED]

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**Q3** Which sector do you associate yourself with? **General Public**

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**Q4** Would you like to make comment on **General comments**

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**Q5** Enter your feedback for Rules of Interpretation **Respondent skipped this question**

**Q6** Enter your feedback for Referrals **Respondent skipped this question**

**Q7** Enter your feedback for Mapping **Respondent skipped this question**

## Consultation Submission Form

**Q8** Enter your feedback for Table of Amendments

Respondent skipped this question

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**Q9** Please enter your feedback for overlaysclick next at the bottom of the page for next topic

Respondent skipped this question

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**Q10** Please enter your feedback for zones and subzonesclick next at the bottom of the page for next topic

Respondent skipped this question

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**Q11** Please enter your feedback for general policyclick next at the bottom of the page for next topic

Respondent skipped this question

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**Q12** Please enter your feedback for Land use Definitionclick next at the bottom of the page for next topic

Respondent skipped this question

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**Q13** Please enter your feedback for Admin Definitionsclick next at the bottom of the page for next topic

Respondent skipped this question

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**Q14** Please enter your general feedback here

Concerned about environmental impacts on planning especially related to:  
National Parks and Reserves  
Climate Change  
Biodiversity

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**Q15** Do you have any attachments to upload?(pdf only)

Respondent skipped this question

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