
From: Phil Davis <[REDACTED]>
Sent: Friday, 21 September 2018 2:14 PM
To: DPTI:Planning Engagement
Subject: Attn Sarah Elding - Input to Proposed planning policy document

Dear Ms Elding

Thank you for producing the proposed planning policy document and giving the opportunity for comment.

I wish to make the following comments in relation to that document. In each case I have quoted from the document and given a page number prior to adding my own comments -

Page 13 "On average, South Australia's net interstate migration losses are around 3,500 annually. Two-thirds of these are comprised of young adults aged 20 to 39 years, many of whom are educated professionals moving to Melbourne or Sydney for employment. This is commonly referred to as the 'brain drain' and highlights the need to retain and attract young and talented workers with career opportunities by creating vibrant places and enabling affordable housing and good transport options."

I DISPUTE the conclusion given.

Is there any thing wrong with losing a few people? 3500 is not many. SA could instead acknowledge that it has a different population pattern and accommodate it. There is no "need" to change it per se.

Page 13 "In 2018, approximately 76 per cent of Greater Adelaide's new housing has been infill development within our established metropolitan suburbs. As a result, the overall composition of South Australia's housing stock is slowly transforming to accommodate the needs of modern families and households at various life-cycle stages"

I DISPUTE the conclusion given.

Just because there has been infill does not mean needs are being accommodated. This has been as a result of supply as much as demand. People live where governments allow developers to put residences. This doesn't mean "accommodate the needs of modern families", it means "shape the pattern of housing which modern families must live in regardless of whether it suits their needs".

Page 14 "seek to promote equity between present and future generations".

I RECOMMEND abandoning or rephrasing this aim.

It is hardly possible for the generations to live similarly in different eras given the changes in population, technology and environment over time. What we need to aim for are the best outcomes for each generation

at their point in time regardless of what happened in the past, and subject to not imposing unnecessarily on the future.

Page 14-15 "Development should be designed to reflect the local setting and context, to have a distinctive identity that responds to the existing character of its locality, and strike a balance between built form, infrastructure and the public realm"

I SUPPORT the above and would like to see it given more prominence in the document.

Page 15 "Planning and design should promote mixed use neighbourhoods and buildings that support diverse economic and social activities"

I DISPUTE the assertion, especially if it is proposed to apply it to all residential areas across the state. Many of the more successful existing residential areas are not mixed use, they are residential only. Similarly, one person's "mixed use" is another's "intrusion of industry on to an otherwise peaceful residential area". It is possible to have dedicated areas of residential and dedicated areas of non-residential provided that the relevant employment, social, recreation, retail areas are within an easy commute from the residential areas. Mixed use can work, but need not be promoted, especially in existing residential areas.

Page 15 "Planning and design should be undertaken with a view to strengthening the economic prosperity of the state and facilitating proposals that foster employment growth"

I DISPUTE the assertion when it come to planning in residential areas. Should this planning for "economic prosperity" override planning for liveability and utility of residents? Does it mean that this plan values development which makes money for the developer but impinges on the lifestyle of the residents? Does it mean the environment always loses out to economic development?

Page 16 "60% of all new housing metropolitan Adelaide will be built within close proximity to current and proposed fixed lines (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045"

I FIND THIS STATEMENT UNNECESSARY. Why 60% and not 30% or 80%? What outcomes would it achieve? If there are no existing good transport options in an area, surely a fast bus could be added with minimal cost when adding new housing.

Page 16 " 6. GREATER HOUSING CHOICE

6.1 Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045

6.2 Housing choice in regional cities and towns will increase by 10% to meet changing household needs in regional South Australia by 2045"

I FIND THESE STATEMENTS MISLEADING.

Firstly, how is it possible to measure housing choice and decree that it has increased by 10%?

Secondly, with the increasing densification alluded to in this document, there will be little or no choice to have larger blocks or reduced numbers of multiple-unit developments in an area, so choice will actually decrease.

Page 21 <categorisation of areas>

I REQUEST CLARIFICATION of the classifications given here.

There is no heading to this page. What are these categories meant to represent? Are they examples? Is every part of the state intended to fall in to one of the categories? Are they meant to describe what currently exists or what the document aims for? A title and/or explanation is needed.

Page 22 "...with reduced carparking ..."

I STRONGLY OPPOSE the inclusion of the above clause.

Experience has taught us that reducing carparking opportunities doesn't reduce car use or car ownership. It just forces people to park on the street, park illegally, etc.

This clause must be removed. We MUST supply an appropriate amount of off-street parking or it will just inconvenience other residents, neighbours and traffic flow. In the long-term there may be a societal change which brings about a reduction in car ownership but there is no sign of that happening now, reducing off-street parking will not prevent it, and it certainly won't occur during the ten-year validity of this document.

25 "Ensure design advice is considered early in the planning process for complex developments and utilises consistent and credible processes (such as a Design Review) to ensure better outcomes."

I FEEL THE ABOVE DOES NOT GO FAR ENOUGH.

We also need to ensure the engagement of local residents by (1) calling attention to the plans at an early stage thus giving a generous amount of time for them to have input, and (2) giving that input due consideration including prioritising it over the financial aims of the developers.

Page 26 "6. Provide a range of planning and development incentives and bonus schemes to streamline decision-making processes, provide dispensation on prescriptive requirements that constrain opportunities, and capitalise on related regulatory or financial incentives outside of the planning system"

I REQUEST THIS BE RE-WRITTEN IN PLAIN ENGLISH as it is almost impossible to understand. I DISAGREE with what I understand this clause is saying in as much as I do NOT feel streamlining and dispensations should be given for development which may unduly inconvenience local residents or endanger wildlife or the environment. Due-process is not red tape.

Page 26 "1. Remove barriers and encourage innovative and adaptive reuse of underutilised buildings and places to inspire urban regeneration, stimulate our economy and unlock latent investment opportunities."

I PARTIALLY AGREE WITH THE ABOVE. Utilising the property for non-traditional uses can have merit, but it must be emphasised that physical alterations to heritage buildings that destroy their character should not be allowed.

Page 32 "Additional policies may be added to this section over time if gaps are identified."

I REQUEST CLARIFICATION of this statement. The document must specify how these additional policies will be formulated and what the acceptance criteria are. This reads like the minister can add new policies at a whim without regard to people's wishes which I would strongly oppose.

Page 66 "Impact Assessable Development"

I REQUEST A DEFINITION of what this is - not just when it is required as stated in the document.

Sent to DPTI.PlanningEngagement@sa.gov.au
I look forward to you response to this submission.

Regards
Phil Davis

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