23 February 2020

Mr Michael Lennon
Chair, State Planning Commission
GPO Box 1815
Adelaide SA 5001

Dear Mr Lennon,

Submission with respect to the proposed new Planning and Design Code

The Mitcham Historical Society Inc is an interested party in connection with the reforms proposed for planning and design in South Australia because of its objectives which have to do with support heritage and conservation within the City of Mitcham LGA. A principal objective of the Society is:

"to assist in the protection and preservation of buildings, works and sites of historical significance in the City of Mitcham, especially to preserve and maintain the character of the Mitcham Village Historical Conservation Zone"

The Society notes that the Historic Area Overlay will provide demolition control and will seek to protect valued streetscape characteristics.

In general terms, the Society is supportive of efforts to simplify and improve the planning system in South Australia, however it does have concerns that what is being proposed may seriously impact upon the following, particularly as a result of urban infill:

- the amount of open space available to communities, particularly in the Adelaide Metropolitan area;
- an increase in the number of vehicles parked in streets;
- flood mitigation – more houses means more water flows in streets and creeks;
- insufficient public transport planning;
- less trees as a result of cutting trees down to build multi-storey apartment blocks and building blocks not large enough to accommodate deep rooted trees.
The Society is of the view that whilst the 3000-page database that has been created is a significant reduction in size from the 70+ individual council development plans, it cannot be easily interrogated and tested because the E-Planning Platform is not available.

As a consequence, the Society earnestly suggests that the consultation period be extended until such time as the E-platform is up and running, so that all stakeholders (citizens, planners, developers, builders, Councils etc) can test it and errors, bugs and faults can be eliminated or fixed.

The Society is also of the view that it is likely the new Code will be interpreted differently at different levels: i.e. by individuals, developers, planners, Councils, the ERD Court, and lawyers. What steps will be taken to ensure consistency of interpretation? One further question, what happens to established precedents when the new system starts, i.e. all the ERD case law up to then?

Yours sincerely,

John Wood
Chairperson