

29 November 2019

The Chair  
State Planning Commission  
Government of South Australia  
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### **Submission Draft Planning & Design Code**

When heritage is gone it is gone. It cannot be replaced.

The document *Draft Planning and Design Code Historic Area Statements Proposal to Amend Phase 2 (Rural Areas) Planning and Design Code Amendment District Council of Robe* outlines that demolition controls in State Heritage Places Overlays will involve assessment using a single set of criteria 'including' 'the building's existing heritage value' and 'the structural condition of the building and risk to safety'. What else is to be considered in this assessment? Does the community of Robe need to have over 70 historical buildings professionally reassessed by 31 March 2020 to list all the important elements that may protect them more from being demolished? What about the ones that are not in this Historic Area shown in this document, hastily drawn up this month without consultation with the District Council of Robe?

There are many more areas of concern, just from what we have been able to read in the time we were given. We cannot see that replacing several pages of the Robe Development Plan that are designed to protect the heritage of Robe and have been tried and tested over many years, with a half page hastily drafted table in the Robe Historic Area Statement, can be called progress.

Our Branch of the National Trust of South Australia consider that process of Consultation on the new Planning and Design Code would be a 'joke', if the likely ramifications were not so serious for the people of South Australia and particularly for the township of Robe.

Were the people of Robe really expected to be able to read, comprehend, obtain professional advice and consider the consequences of what the Commission is proposing, with the enormous quantity of poorly presented material that they were expected to find on the poorly designed SA Planning Portal, and do all of that in a completely impossible time-frame?

How insulting is it that the people of Robe were expected to do this when the main document for Robe was that titled *Draft Planning and Design Code – District Council of O Robe Council Specific Code Extract October 2019*? This is an online PDF document of 749 pages with no Table of Contents or index. The only numbered headings in it are Part 1 to Part 10. Part 2 for instance covers the PDF pages 7 to 451, with no other numbered headings for reference, so that the reader has to try and work out from the size of the heading's font whether the topic has changed and its level of importance to the topic.

In our opinion the whole consultation phase for this Code should begin again and be carried out

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properly in a competent manner that serves the whole of the population of South Australia, present and future, rather than mainly to serve those who wish to demolish our heritage.

Ms Jillian Davidson  
Branch Chair