

Phase 3 Planning Submission

Executive Summary

I am representative of “the quiet majority” and have read the provided documents. I recognise that it is a massive task to replace an existing system that has been developed and refined over many years. The replacements, in many areas, both in the aspirations and detail are **inadequate, or insufficient to make the documentation interpretable, actionable or enforceable**. The aspirations often wrongly assume “business as usual” in a changing world. As such, I recommend that the implementation of the new Planning System be delayed until it is fit for purpose. Premature implementation will allow aggressive developers a minimally-restrained hand, create great division in our communities, and anger towards those who brought on the chaos. This can be avoided.

About Myself

I faithfully declare that I am not and have never been a member of a political party nor of a quasi-political or environmental organisation. In essence, I am a member of “the quiet majority”. I have read the following documents: Draft Planning FAQ’s, Good Design Snapshot, Guide to Demolition Control in State Heritage Areas, Heritage and Character Fact Sheet, Overview of Neighbourhood Growth and Change, Planning Character Area Statements, Planning and Design Code Phase 3 Code Amendments, Renewal Energy policy, State Heritage and Conservation Zones Snapshot. I have consulted the head of planning in my local council area and believe that I correctly understand the content of the above documents.

About the Documents

A lot of work has been put in to the various documents by the state planning commission teams and by our local councils. I thank them for it. I understand there are many advantages in replacing sometimes idiosyncratic council rules with a state-wide development plan. But there are also disadvantages of such a “one-size fits all” approach.

I categorise the documents as belonging to “motherhood statements” (aspirational with no detail) or “statements with supporting detail”.

The Aspirational Documents

I find the motherhood statements appropriate, a pleasure to read, yet regrettably insufficient. There are key failures by omission and/or incorrect base assumptions:

Aspirations and addressing the Psychological Environment

The aspirations do not address the adverse impact on community and individual health of the proposed single person dwellings. It appears that the intent in freeing up developers to locate 6-storey apartment blocks adjacent to arterial roads is to house such people. This outcome, evident in the typical design of similar dwellings erected to the present day, will confine individuals to small, sterile accommodation, aggravating isolation, anxiety and depression. The occupants will be exposed to noise and other forms of pollution living adjacent to arterial roads. These adverse impacts will contribute greatly to ever-rising health care costs.

Aspirations and the Physical Environment

The aspirations do not address the impact on our health and well-being of the evidently yet-to-be-adequately recognised new paradigm of greater weather extremes (heat, cold, dust, pollen, erratic rainfall, hailstorms and the like) nor the micro-environmental impact of increasing infill and multi-storey dwellings, which are now, despite Mr Trump’s assertions otherwise, “known knowns”.

Aspirations and our Carbon Footprint

The aspirations do not recognise that we have negligently and it seems in the lifetime of the youngest Australians, likely greatly to our future cost, failed globally, nationally and locally to properly and correctly count the true cost of new development required under the paradigm of “continuous growth”, nor do they address the carbon debt of our state related to the cumulative effects of long-term poor planning and design - i.e we have significant catch-up to recover our “environmental debt” (for want of a better term) resulting from the substantial loss of vegetation that has occurred in the past 40 - 50 years, added to by the large increase in power generation

largely related to/associated with roadways, reliance on private transportation, heating, cooling and ventilation of our commercial and residential buildings, including the unrecovered environmental cost of the build and of demolition/recycling of what was there before.

In plain words, “business more or less as usual” is wrongly assumed in the aspirational elements of the current version of planning for our future.

Renewable Energy Policy

In relation to the renewable energy policy, much of the document is appropriately forward-thinking, and again I congratulate the contributors. In the detailed documentation, energy security is partly addressed but overlooks the critical component in our energy security of dependence on international funding and ownership in whole or part of the means of generation. We should not be indifferent to international ownership of energy generation nor water and fuel supply. I believe we are approaching dangerous times in the global geopolitical environment, and that our federal governments current and past are/have been asleep at the wheel in this regard. We can't afford to ignore this at state level, given our dependence on foreign investment for complex and/or expensive technology required for renewable energy generation and distribution. In relation to other detail in the renewable energy document:

1. Solar power is not maintenance free. Solar panels deteriorate in performance over time and our increasingly dusty and hyper-pollinated environment indicates that cleaning periodically may be required to optimise benefit. This is not easy especially in the context of an ageing population indicating that professional maintenance (cleaning) will be required. Additionally, solar panels have a use-by date, and that then requires dismantling and recycling, which itself is an energy impost and will be a significant cost to the owners. Furthermore, if the panels are to be replaced with new, high performance panels then there is the environmental impact of the manufacture and delivery and other installation costs, currently not factored. This clearly has been noted in the document in relation to the large commercial farms but evidently not in relation to the important residential contribution to our energy security.
2. There appears to be no consideration of the effect of the proposed large 6-storey urban developments, intended to address projected increase in demand for single person dwellings. I assume that the available footprint for solar panels will, pro rata, be significantly reduced as a result of such buildings replacing multi-person dwellings such as houses. If such buildings are to become the norm then this needs to be estimated and accounted for in overall energy requirements, including that evidence suggests strongly that such buildings will add significantly per capita to energy requirements for heating, cooling and ventilation above and beyond the requirements of the houses they replace.
3. Is it realistic that the state in relation to power generation could or even should become independent? Perhaps the state could take the lead in energy generation in Australia and export energy to the Eastern seaboard? That is an exciting potential opportunity but there are key risks: interstate rivalry, and issues related to foreign investment including control by foreign governments not subject to open market forces (e.g. USA, China, who create their own rules).
4. The concept of hydro pumping will impose a significant energy drain; it is unclear what the trade-off value is for the extra capacity and/or energy security offered by such schemes in our unhelpfully flat, water-deplete environment.
5. In common with much of the other published material, this document is elsewhere deficient in detail, for example stating “policy will be developed....”. My interpretation of the several elements that contain similar phrases is that these are too vague to be useful, and are widely open to interpretation and manipulation.
6. Also missing is planning for the shift to electric motivation of personal vehicles. The implication of the planning documents is that people will in future rely less on private transportation and instead use public transportation. I challenge this notion because: there is no evidence to date that South Australians will widely embrace public transportation; we do not have the population base to fund major improvements in public transportation, such as underground light rail or efficient, pleasant-to-use bus services. The shift to electric vehicles requires careful planning to minimise demand for recharging at home. If this does not occur, or if a superior form of energy generation is not discovered and made available, there may be significant disruption to the security of the state grid. This is an issue nation-wide and there are opportunities here to lead, as South Australia has done already with renewable energy.

Documents Insufficiencies

In relation to the other detail (found predominantly in two, 3000+ page documents), whilst there are indeed pockets that truly are detailed (e.g. listing specific addresses of locations recognised as having heritage value) **in too many places for comfort there is insufficient detail to make the documentation interpretable, actionable or enforceable.** This applies to most of the documentation. In some cases, the provided detail is non-reassuring. For example, to plant “a tree” is a requirement of new infill development. There is no requirement to nurture and maintain the tree for the life of the new development. I do not believe that a single tree will compensate for the impact of the construction and development in all its phases, including ultimately the environmental cost of the demolition of the structure, nor the loss of habitat for birds, possums etc, the loss of cooling and improvement in our air quality from ripping out trees, shrubs and lawns, and replacing these with concrete, steel, and brick and so forth. The effect on the water table of the replacement of vegetation and ground by pavers and the like appears inadequately considered.

Conclusion

In short, the plan is, regrettably, manifestly inadequate and will in the long run fail us badly. If I were a largely or solely profit-motivated developer, which is the norm, I would be quietly happy with this plan. I am an ordinary citizen. I am very unhappy with this plan and believe it should be rejected.

Recommendations

Phase three of this plan must be further developed by an ongoing concerted effort from the Planning Commission with major input from our local councils.

The Planning Commission must improve the aspirational documents to address key shortfalls.

The Planning Commission must address the intersection between planning and other aspects of state and national policy, especially related to energy security and climate change.

Councils must be closely involved in assisting the Planning Commission to more clearly articulate using terms that are interpretable and actionable the fine detail of the plan.

A 5-year trial of the finalised plan involving 10% of metropolitan councils should be used to test the functionality of the plan in action. Deficiencies should be corrected before the revised plan is made law.

Assuming the plan is not withdrawn, the “the quiet majority” must at the next state election express in the ballot box their dissatisfaction with such an outcome.

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