

29 November 2019

To: DPTI.PlanningReformSubmissions@sa.gov.au or DPTI.PlanningReform@sa.gov.au

Re: Comments on Draft Planning and Design Code, Phase 2 – rural areas

Dear Officer,

Thank you for considering my submission.

As someone who works/studies full time and has caretaking and volunteering commitments, like most South Australians, I deplore not having had time to review all the details of the proposed Code. As I am about to send this submission, I have just received a copy of the comments written by the Nature Conservation Society of SA. I support those comments, many of which match mine.

1. The pretend consultation process is farcical and unbecoming to a State Government:
 - Not enough time is given to examine hundreds of pages of gobbledegook
 - It is one of the busiest times of year for rural populations
 - Two websites present two different lots of information
 - The information uses inappropriately leading language throughout
 - No attempt has been made to present the information fairly, so that it is understandable to the general population
 - No detail is given showing clearly the changes and their impacts

→ Considering the vast implications of this proposed Code for people's wellbeing and for environmental outcomes, it is disappointing to see South Australians exposed to a process that is not genuine. A fair process would consider the points above; the process should be started again from scratch and include vast numbers of corrections.
2. In rural areas, "form-based performance" will be detrimental to both primary production and conservation.
3. As I type with the light on in the middle of the day, since the neighbours built a giant black shed right against my living room window, I have the best evidence that the free-for-all development style of operation preconised by the proposed Code is disastrous. Our most precious South Australian assets would be affected by this Code, including pristine wilderness, biodiversity, ecosystem services, community peace and wellbeing, and Heritage. In addition, the infill in urban environments already has caused unsolvable problems (e.g. runoff), which would worsen. The proposed Code does not lead to sustainable development.
4. Habitat has been ignored throughout; biodiversity is not just some types of vegetation.
5. The battering of protected areas under this Code is not only reprehensible, but illegal. Inaccurately mapped zones and relabelling of some highly protected areas (Conservation Parks! E.g. Warrenben CP, islands) as "rural" or "no information" are deceptive. Failing to protect protected areas is the worst failure of humanity, to its detriment, and that is what this Code proposes. Public places belong to the public, not to private developers. Areas have been protected based on scientific evidence to retain the last of nature,

ecosystem functions, and climate change resilience. They also offer health and spiritual refuges to people, and revenue from tourism. Short-term greed aiming to build private constructions in those areas will undermine long-term income from wilderness tourism. Australia is one of the last “first world” countries on earth where wilderness tourism may be undertaken, and economic benefits will keep increasing over time if left intact.

Building in the wilderness results in the destruction of wilderness.

→ Wilderness areas, Parks (and Heritage Agreements), and coastal reserves must be protected in Conservation zones that are real (Code proposals are illegal based on the Wilderness Protection Act 1992 and NPW Act 1972; zoning must be consistent with the Acts). The Visitor Experience subzone in parks negates the Acts and the freedom of the public. The Code eliminates notification for public lands, right of appeal, and the notion of public good. This is absolutely unacceptable if we are going to retain a democracy.

Although everyone likes simpler processes, strict processes are still necessary, and the undermining of our natural and Heritage assets is not acceptable. The Code is misled in ignoring biodiversity values in coastal areas and elsewhere. It is not only a matter of footprint, but also fragmentation and degradation, the primary causes of extinction in Australia (see Senate’s extinction crisis report of this year). The complete disregard of the proposed Code for scientific evidence (e.g. current impacts of infill in SA, impacts of degradation of parks on ecosystem services and biodiversity as published in top journal *Science*, ignored recommendations from SA renowned scientists, impacts of habitat degradation in IPBES report of this year, impacts of tourists placed in inappropriate locations as demonstrated by many scientific studies), impacts on wellbeing (free-for-all style), and grossly inappropriate consultation process indicate that the proposed Code should be rejected and redrafted, with due consideration for the biodiversity and ecosystem services that keep us alive and healthy. Exclusion of the public from development decisions on public lands (right to be notified, right to appeal) threatens the very fabric of our democracy.

Sincerely,

Dr. S. Petit, Prospect SA 5082, Penneshaw SA 5222

Cc: MP Andrea Michaels enfield@parliament.sa.gov.au

Cc: MP Leon Bignell mawson@parliament.sa.gov.au

Cc: Dr Susan Close, Deputy Leader SA Labor party ptadelaide@parliament.sa.gov.au