

**From:** [Peter Croft](#)  
**To:** [DPTI:Planning Reform Submissions](#)  
**Cc:** [Anne Wharton](#)  
**Subject:** Commenting on Planning and Design Code for Urban Areas  
**Date:** Thursday, 20 February 2020 11:33:28 AM

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I am writing to support the submission in respect of the Planning and Design Code from Water Sensitive SA. In draft this is found at <https://www.watersensitivesa.com/wp-content/uploads/Planning-and-Design-Code-DRAFT-WSSA-submission-v3-21Jan20.pdf>

I attended a workshop run by Water Sensitive SA at Marion on 5th February. In attendance, over 60 community members and a DPTI staff member spoke on the forthcoming Planning and Design Code.

Of particular concern to me is the ability of Adelaide to adapt successfully to climate change. In this context I note that the Draft Planning and Design Code and supporting policies contain many references to measures which would enable such adaptation to occur (e.g a reference to a target of 20% increase in urban green cover by 2045). However, I could not see how, in practice, this target will be achieved by the Draft Planning and Design Code. In fact, it is much more likely with developments only needing to meet the minimum standard in order to be Deemed to Satisfy, that green cover will rapidly decrease. **Not increase!** At the 5th February workshop, Water Sensitive SA outlined some typical developments involving subdivisions which met the proposed minimum standards and it was quite clear that this would be the case.

At the same workshop, Water Sensitive SA also outlined alternative models for larger developments in which much greater green space could be provided while not sacrificing the number of dwellings on the block. Essentially, this could be done by placing car parking space under dwellings and designing the remaining space thoughtfully - providing common green space as well as private green space, and providing for the bulk of storm water to remain on the property rather than be discharged to the street.

This approach seems logical to me. Essentially, I would suggest that the Water Sensitive SA proposals be considered seriously **with a view to setting mandatory targets for all new developments** as follows:

- at least 30% vegetated
- a further 20%, at least, permeable

As a second issue, I am concerned at what is happening to properties such as the one that my wife and I have owned for 38 years at [REDACTED] Parkside. My understanding is that in the current Development Plan ([https://www.dpti.sa.gov.au/\\_data/assets/pdf\\_file/0015/250017/Unley\\_Council\\_Development\\_Plan.pdf](https://www.dpti.sa.gov.au/_data/assets/pdf_file/0015/250017/Unley_Council_Development_Plan.pdf)), at page 108 referring to the Historic Conservation Zone in the Parkside St Ann's Estate and at page 364 showing the associated map, properties deemed as Contributory, such as [REDACTED] Parkside, have certain characteristics given some protection. I have been advised that these protections will not carry forward to the new Planning and Design Code to the same practical extent. I view this as a mistake as it will inexorably lead to a reduction in character, history and sense of place. I would like to see at least the same level of protection maintained for these items.

In summary, I recommend that the Draft Planning and Design Code be amended along the following lines:

- set mandatory targets of at least 30% vegetated and a further 20% permeable to ensure that the level of green cover does actually increase over time
- change the level of protection given to Contributory items so that at least the same level of protection is provided as now, to ensure that Adelaide retains its sense of place.

I can be contacted at [REDACTED], Parkside SA 5063 or on phone [REDACTED] if you wish to discuss my comments.

Yours sincerely

Peter Croft

To DPTI Planning Reform

I am writing to you regarding the draft Planning and Design Code which is currently out for public consultation.

I have commented on several of the past consultation papers over the two years. My consistent concern has been that, while the goals of the planning system are lofty, **there is no clear path by which they can actually get implemented** for the majority of development applications (DA).

As I understand the proposed new arrangements, as long as a DA for an individual development broadly meets minimum standards it can be *deemed to satisfy* and can proceed. Thus key goals relating to the planning system in areas such as design or tree canopy/biodiversity can simply be ignored. At a time when adaptation to climate change must be a priority, **a key role of the Planning system must be to absolutely ensure that adequate tree canopy is guaranteed and our neighbourhoods remain liveable.** South Australia's future depends on it.

The Draft Code continues much of what is wrong with the current system. A drive along Anzac Highway, for example, shows many poor quality new developments, largely covering all of the sites with hard surfaces and few trees.

In addition, the new arrangements effectively remove whatever protections the current system has afforded contributory built items.

I also believe that the draft Planning and Design Code has many flaws in its current form. These are too numerous to be fixed quickly and ensure that the Code is made law by 1 July 2020. I strongly recommend that the consultation period for the Planning and Design Code be extended until the many existing flaws are addressed.

Yours sincerely  
Peter Croft

[REDACTED]

[REDACTED]

Parkside  
SA 5063

**From:** [Unley EO](#)  
**To:** [DPTI:Minister Knoll](#)  
**Subject:** FW: Planning and Design Code  
**Date:** Tuesday, 4 February 2020 2:40:54 PM

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Dear Minister Knoll,

Please see below an email from an Unley Constituent re Planning and Development, as discussed with Cameron.

Thank you,

Regards,  
Dian

**Dian Naraniecki** | Assistant

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Hon David Pisoni MP | Member for Unley  
Minister for Innovation and Skills  
**372 Unley Road, Unley Park SA 5061**  
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Dear Mr. Pisoni

I am in your electorate and wish to advise my concerns about the Planning and Design Code.

While on the surface, the idea of bringing the various Council Development Plans together and making them more consistent, seems a good one, I have significant concerns that the end result is a bad one for the community - and Unley in particular.

The draft Code and the new Planning system behind it, takes away the powers of Unley Council to manage, on behalf of its citizens, the liveability of our City. And liveability really matters. My impression is that, under the new Code, it will now be easier to knock over significant and regulated trees than before, to construct dwellings on smaller blocks with little or no tree canopy (thus much hotter in summer), to knock over contributory items such as the houses in my neighbourhood and to construct multi-story buildings which take away the amenity of their neighbours and which make the liveability of Unley much worse.

I urge you to use your influence to halt the implementation of the Code and to rethink the Planning system.

I am happy to discuss alternative approaches with you.

Yours sincerely

Peter Croft

[REDACTED]

Parkside

SA 5063

Ph [REDACTED]

Email: [REDACTED]

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