

Carol Faulkner
[REDACTED]
Cheltenham SA 5014

27 February 2020

Hon Stephan Knoll, Minister for Planning
c/- Department of Planning, Transport and Infrastructure
Level 5, 50 Flinders Street, Adelaide 5000
GPO Box 1815, Adelaide SA 5001

via email: DPTI.PlanningReformSubmissions@sa.gov.au

Submission re: Draft Planning and Design Code Phase Three (Urban Areas)

Dear Sir,

Thank you for the opportunity to comment on the draft Planning and Design Code (“PDC”). I am writing this submission as a resident-owner of a character home designated as a Contributory Item within the Residential Character Zone (Historic Conservation Area) of Charles Sturt Council. My husband and I have lived here for twenty-six years. We bought the property because we valued its characteristics along with the characteristics of the locality. We raised two children in a family-friendly neighbourhood with space to live, learn and play in a green urban environment. I could not imagine life without the open space, trees and birds that are an integral part of our health and wellbeing.

I take a keen interest in planning & development matters and have made previous submissions regarding other aspects of the current planning reforms. I had intended to write a submission on the PDC even before we received the pro-forma letter from the State Planning Commission seeking feedback from property owners in Historic Conservation zones/areas.

Not surprisingly, my comments will concentrate on the draft PDC’s provisions relating to Historic Area and Character Area overlays. I will also make some general comments on the PDC and the overall planning reforms.

Cheltenham West Historic Area Statement

I begin with a very specific comment in relation to the Cheltenham West Historic Area Statement (ChSt17) on page 86 of the document titled, *Historic Area Statements and Character Area Statements – Proposal to amend Phase 3 (Urban Areas) Planning and Design Code Amendment [DPTI-240]*. I will refer to this document as the “Phase 3 Amendment”.

In the table on page 86, next to “Architectural features”, I respectfully request the removal of the text: “Housing close to Torrens Road and south of the railway line more ‘mixed’ in character”.

The purpose of Historic Area Statements, as stated in the Phase 3 Amendment is to:

“assist in describing the historical themes and elements that are important considerations in development assessment” (page xi), and:

“help clearly identify and articulate the key elements of historic importance in a particular area” (page xiii).

I submit it is counter-productive to the purpose of Historic Area Statements to include information that gives the impression of watering down the area’s historic merit. It sends the wrong message to certain people who would seek to capitalise on the whiff of a suggestion that there are notional ‘sub-areas’ within Historic Areas where non-compliance of the area’s development controls will be tolerated. This allows the rot of overdevelopment to creep in, which in turn sets a precedent for more of the same.

My neighbourhood is living proof of that. For your interest, I attach an unsolicited offer received from the apostrophe-challenged “Nathan” who is looking for properties to purchase like ours...or even just a portion of our backyard. The offer was made despite such development being non-complying in historic conservation areas.

I therefore submit that information about housing in certain areas being “mixed in character” is neither desirable nor necessary at the level of Historic Area Statements. That type of detail will be considered at the development assessment stage by local planning authorities who will determine the specific characteristics of the surrounding area.

Contributory Items

I strongly submit that Contributory Items should be retained in the new Planning and Design Code.

I conducted extensive research to test the claim by the State Planning Commission in its pro-forma letter that properties “will continue to be protected, as they currently are in Historic Conservation zones”. I can say with certainty that is not the case.

I examined every reference to “Historic Conservation” and “Contributory Item” in Charles Sturt Council’s Development Plan. It is patently evident from the numerous instances where extra development controls apply to contributory items that the designation of “Contributory Item” adds an extra level of protection over and above being located in a Historic Conservation zone/area.

The Phase 3 Amendment argues that contributory items “have no statutory basis” and “have been applied inconsistently” (page xii).

Given the strong community feeling on this issue, I suggest a compromise can be achieved by the inclusion of contributory items in both the PDC and the PDI legislation, to be administered with uniform development controls which can be decided through consultation with Councils. There is no better time than now, while we are in the current process of planning reform, to give contributory items the statutory basis they require.

Climate emergency

I reiterate what I said in my submission on the Natural Resources and Environment Discussion Paper in October 2018 (copy supplied). Given the dire warnings by state, national and international bodies sixteen months ago, I can't see any meaningful response to the climate crisis in the Draft Planning and Design Code Phase Three.

While I applaud the initiative of deep soil zones, it is a miniscule drop in the ocean of what is required to address the climate crisis. And of course, the development industry is already violently opposed to the idea:

"It's just a policy to make people feel good. In its practical application it is going to solve nothing. It will just have a cost on housing affordability, which we think is wrong. What people are not considering is if you've got a very narrow block of land, you have got very little space to put a tree. And a tree on your side also impacts the neighbour, so there is a cumulative effect. Our view, clearly as industry, is these trees should be in the public realm, footpaths, median strips and paths. You can't force it on homeowners to fix green canopy issues in Adelaide."

- Housing Industry Association SA director Stephen Knight, "House and tree package backlash", *The Advertiser*, 15/11/19.

Indeed, developers are still complaining about mandatory rainwater tanks:

Chief executive of the Master Builders Association (SA) Ian Markos said the State Government also needed to stop mandating items like rainwater tanks for first home buyers – a long-held gripe of the building industry.

- "Industry digs in on housing strategy", *The Advertiser*, 9/12/19.

By all means and despite developer objections, press ahead with mandatory deep soil zones but much more will need to be done in the sphere of planning reform to mitigate the heating of our urban areas due to climate change.

I submit there is one thing that will effectively counter the loss of tree cover and mitigate the effects of climate change, and it will require minimal effort and public resources – incorporate existing contributory items into the Planning and Design Code. The collective contributory items across metropolitan Adelaide, with their trees, lawns and gardens on larger blocks, perform a valuable function as a carbon sink, contribute significantly to the metro area's tree canopy cover, and provide a network of green corridors to support biodiversity.

Incorporating existing contributory items in the Planning and Design Code will;

- Significantly contribute to carbon dioxide sequestration by trees, lawns and shrubs
- Significantly contribute to tree canopy cover
- Significantly reduce heat island effect
- Provide biodiversity corridors for native wildlife (birds, bees, butterflies, lizards, frogs etc)
- Enhance people's wellbeing and quality of life
- Provide housing choice for a style of home that is still widely sought after.

Viva la différence: there's no "one size fits all" in human communities

I finish by stating my overall objection to Councils being forced to adhere to one set of rules for a diverse range of local communities. Adelaide is a sizeably-large, multi-demographic city. The aim of achieving conformity in planning controls denies the natural variations in urban conditions that shape people's different needs and desires. I know you don't agree, but this being one of the last chances people will have to make submissions on the subject, there it is.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Carol Faulkner'. The signature is written in a cursive, flowing style with some loops and flourishes.

Carol Faulkner, concerned citizen.

AUSTRAL PROJECTS

Dear Homeowner's,

We are local property investors that are looking for properties to purchase in your area, off market at above market prices.

We have identified your property may be a suitable fit for what we are looking for

We can work with your requirements for either long, extended settlements in order to get your affairs in order or fast turnarounds...

If you have ever thought about selling your property without all the associated marketing, agent commissions & open houses at an above market price please give us a call or text on **0402 738 907** to discuss further.

Alternatively feel free to contact me via email:

Nathan@australprojectsteam.com

We look forward to speaking with you soon.

Kind Regards

Nathan
Austral Projects
10/151 Brebner Drive West Lakes SA

P. S: WE ARE OPEN TO JUST PURCHASING
A PORTION OF YOUR BACKYARD & PAY
FOR ALL SUBDIVISION FEES ECT

Carol Faulkner

Cheltenham SA 5014

12 October 2018

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Submission re: Natural Resources and Environment Discussion Paper

I am sending this submission with urgency because of three very important reports that were released this week which I believe demand immediate attention and inclusion in the discussion of natural resources and environment associated with South Australia's new planning system.

The three reports (with links to where they can be downloaded) are:-

Tracking Changes in South Australia's Environment, SA Department for Environment and Water
Released 10 October 2018

<https://data.environment.sa.gov.au/Content/Publications/DEW%20trend%20and%20condition%20report%20card%20summary.pdf>

Indaily gives a good coverage of the report here:

<https://indaily.com.au/news/2018/10/10/sas-train-wreck-climate-change-outlook/>

Global Warming of 1.5°C, Intergovernmental Panel on Climate Change

Released 8 October 2018

<http://www.ipcc.ch/report/sr15/>

The Good, the Bad and the Ugly: Limiting Temperature Rise to 1.5° C, Climate Council (Australia)

Released 8 October 2018

<https://www.climatecouncil.org.au/resource/reports/>

The climate change reports identify the dire consequences if strong action is not taken immediately to limit global warming to 1.5°C. Global emissions must be down by at least 45% by 2030 from 2010 levels to keep global temperature rise to no more than 1.5°C.

It's a clarion call to action and it involves everyone – all countries, states and cities, governments and citizens.

The release of the IPCC's latest report dramatically dials up the urgency of taking action on climate change and I submit it requires an immediate revision of all government policy, especially around population and planning, including all the draft policies that are currently under consideration regarding South Australia's planning system.

I reiterate what I said in my earlier submission on the draft State Planning Policies about rejecting the 30-Year Plan's targets that are driving the push for population growth and the associated proliferation of urban infill. I take that stance because of a lifelong concern for the River Murray and the environment in general.

As I said in my submission to the parliamentary inquiry into migration (copy supplied), societies everywhere must use human ingenuity to decouple economic growth from physical growth if we are to survive the existential crises of overpopulation and climate change.

Back to the Natural Resources and Environment Discussion Paper, I can't help pointing out the irony of the graphic on page 2 of the Discussion Paper Summary about trees and plants making a good city great. For goodness sake, trees are the first casualties of urban infill as we've all witnessed since the onslaught of infill began in earnest with the release of the 30-Year Plan.

Trees are critically important in reducing atmospheric concentrations of carbon dioxide plus for all the other reasons mentioned in the graphic (I can personally attest to the benefit of "healthier, happier and more productive people").

Proceeding with the 30-Year Plan's aim to house an extra 560,000 people in Greater Adelaide does not equate with wanting more trees in the metropolitan area and needing to reduce the effects of climate change. It is simply irreconcilable.

Drastic action is required now. Business as usual is not an option. The South Australian Government must go back to the drawing board on population and planning in light of the latest update on the clear and immediate danger of climate change.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Carol Faulkner', written in a cursive style.

Carol Faulkner, concerned citizen.