

DIT:Planning Reform Submissions

From: aaron parker <[REDACTED]>
Sent: Friday, 18 December 2020 12:16 PM
To: Woehle, Karl (DIT); DIT:Planning Reform Submissions
Subject: Feedback on the New Planning System

Categories: Kate

Dear Karl

Thanks very much for your help on the phone today. As you know, I live at [REDACTED], St Peters, which is currently a Contributory Item in an Historic Conservation Area. As discussed, I have two concerns about the New Planning System:

1. A lack of definition of Representative Buildings, particularly with regard to demolition control.
2. Development on laneways in St Peters, in particular the potential for subdivisions and frontages onto laneways.

The New Planning System has not carried over the same protections for my property. I have included a table showing a comparison, below:

Current Development Plan (NPSP, 21 March 2019)	Revised Planning and Design Code (December 2020)
<p>A Contributory Item (listed in Table NPSP/7) should not be demolished or removed, in total or in part unless:</p> <p>(a) the part of the item to be demolished or removed does not contribute to the heritage value, historic character or desired character of the zone; or</p> <p>(b) (b) the condition of the item is structurally unsound and substantial rehabilitation work is required to an extent that is unreasonable; and</p> <p>(c) (c) in either of the circumstances described above, the demolition of that building, or that part of a building, is part of a development involving erection of a substitute building, or part of a building, or addition to that building, in a manner which does not diminish the level of contribution to the historic character of the zone made by the building on the site of the demolition.</p>	<p>Representative buildings referenced in Historic Area Statements and Character Area Statements and mapped* in the South Australian Planning and Property Atlas are buildings which display characteristics of importance in a particular area. The identification of representative buildings in a particular area is not intended to imply that other buildings in an historic area are not of importance.</p>
<p>Rear access lanes (shown on Map NPSP/1 (Overlay 4)) will be used for the purpose of vehicular access only, no dwellings will have their primary street frontage facing a lane.</p>	<p>Mix of close-set, single-fronted cottages on narrow allotments and a range of cottages and villas set on larger allotments with more substantial established gardens, in wide streets, often with rear service lanes. Rear lanes used for vehicular access and garages</p>

*These are currently *not* mapped on SAPP.

As you can see, this appears to give Representative Buildings less protection from demolition than Contributory Items. The omission of the word "only" from the statement on laneways also provides less protection from subdivision and primary frontages on laneways.

The objective of the *Planning, Development and Infrastructure Act 2016* is to "...be based on policies, processes and practices that are designed to be **simple and easily understood** and that provide

consistency in interpretation and application...". The new planning system has the opposite consequence of making the development more ambiguous and confusing.

Could you please forward these concerns to your team for review. My recommendations are to:

1. Transfer the existing wording and controls from Contributory Items to Representative Buildings, particularly restricting demolition.
2. Transfer the current statement for rear access lanes, stating that laneways are for vehicle access **only** and not for primary street frontages.

With thanks

Aaron Parker

