



17 December 2020

Mr Michael Lennon
Chair of the State Planning Commission

By email: DIT.PlanningReformSubmissions@sa.gov.au

Dear Michael,

RE: FEEDBACK RELATING TO REVISED PLANNING AND DESIGN CODE

We write in relation to the request for feedback for the revised draft of the Planning and Design Code (the Code). In particular, we write in relation to land division within the Conservation Zone.

For context, during the conversion of the District Council of Franklin Development Plan to the Better Development Plan format (the General and Coastal DPA gazetted in 2015), the Zone boundaries along the coast were revised and resulted in large areas of land being added to the Coastal Conservation Zone. Such resulted in the zone boundaries encroaching on areas currently utilised for farming and significantly altered the ability for owners to undertake development on their land, including land division. Since this change, the District Council of Franklin Harbour (the Council) have sought to revise these zone boundaries to more accurately align with the 'edge' of existing farming activities.

The Planning and Design Code has resolved a number of concerns that were introduced by the abovementioned zone boundary changes. Our submission requests the following changes to be made to the Conservation Zone:

- Altering DTS/DPF 2.1 to read '*Land division satisfies (a) and (b) or (c)*', and add (c) which states: '*creates additional allotments and all allotments have a minimum size of 400 hectares*'

The above change would support the creation of allotments greater than 400 hectares in size. It would also result in these land divisions being 'performance assessed' rather than 'restricted' given land division that meets Conservation Zone DTS / DPF 2.1 is excluded from being classified as a 'restricted' development within Conservation Zone Table 4 – Restricted Development Classification Table.

The above will enable land owners to improve succession planning for large agricultural land holdings whilst ensuring that impacts on the Conservation Zone are minimised by retaining generous allotment sizes of 400 hectares. We note that allotments of 5 hectares are envisaged where they will accommodate tourist accommodation uses. In this context, the request for 400 hectare allotments that accommodate existing farming and conservation uses is considered reasonable.

We appreciate the opportunity to provide feedback on the Code and your time reviewing this feedback.

If you have any questions relating to the matters raised in this letter, please contact Shane Gill on [REDACTED] or [REDACTED]

Yours sincerely,



Shane Gill
Chief Executive Officer