

## DTI:Planning Review

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**From:** Elizabeth Ho [REDACTED]  
**Sent:** Friday, 16 December 2022 3:05 PM  
**To:** DTI:Planning Review  
**Subject:** Comments to the Review Panel due by COB today

[REDACTED] [REDACTED]  
[REDACTED]  
Dear Review Panel

I am a concerned citizen and a former member of the State Heritage Authority, precursor to the SA Heritage Council.

There are three matters that I wish to raise with the Review panel.

### Return to valid and meaningful Community input

In the lead up to the new planning system many people asked how public rights to information, input and review would be enabled. Many have since found that there are very limited opportunities to influence decisions, especially local demolition of buildings that significantly reflect the character of the suburb. We appear to lack the necessary processes and elements to ensure that the community IS empowered to genuinely engage with the planning system. We need policy within the Planning and Design Code that responds to local views, local conditions and neighbourhood character.

### Protecting local character /poor design

In my opinion any building that is over 100 years old ought to have specific “close-up review” protections placed around it regardless of overlays.

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If a bluestone building of the 19th century is not in a heritage overlay area it is an immediate magnet for development. By whatever means possible but preferably by using the system of local government that has stood the test of time since its introduction in the 19th century, we need a return to a system that supports the protection of local character by those who are close to it. We need responsive policy not prescriptive policy in this area. Many of us are watching in horror as rare gems have been removed from our environs to be replaced with poorly designed buildings that are out of character and made of materials that will not endure. *Adaptive reuse* needs to feature much more prominently in policy and not just for character reasons, but also for environmental reasons.

Right now the whole system is skewed to development and regardless of the heritage issues, much of what is being built is of questionable design. This needs to be addressed.

I fully support local government having control of decisions over design, heritage and conservation, and consider that Councils should be supported by state government to further build a body of evidence around local circumstances and apply it. Some councils were advanced in this area but my understanding is that their knowledge is not referred to in the latest system. Others needed time and help to create the evidence and were unable to achieve it in the timeframe or through lack of means. One way or another, blanket approaches through overarching policy and without the benefit of local information should be changed.

A further concern is resident investment in character areas being dismissed. You buy in an area for the ambience and then you find you have to contend with an adjacent development that detracts from the overall feel, or creates a negative impact for your property through major infill and garden removal. This is neither fair or acceptable.

### Urban environment issues

Aldi put up a new supermarket regularly. They remove every tree onsite usually and in the final design we get given a cheap grass "line". They are not the only examples, but this "cost escape" clause is totally unacceptable for a large corporate installing masses of car park bitumen in full sun. Heat sinks should not be replacing once green areas, and shade tree planting in open air retail car parks is vital in the driest state in the driest continent. This shocking practice negatively affects our community. They make money out of community and they should give back, not further degrade our environment because the planning system lets them. We need a tree value to be determined that is informed by the long term benefits of mature growth among other things and used to protect our urban forest from over development.

' The tower was coming to the end of the end of its life, in terms of viability... but the structure and the 'bones' can actually last a lot longer," said Fred Holt, a partner at the Danish architecture firm behind the design, 3XN, in a video interview. "You can't always retain everything. But if you can retain the structure — and that's where the majority of your embodied carbon is — then you're lowering your footprint." He is speaking about the 1970 high rise AMP refit - in Sydney - but the same principle applies here - we are elevating the carbon foot print every time we do away with a viable building that has stood the test of time.

Sustainability and environmental degradation - created through close to boundary to boundary infill, demolition waste, destruction of embodied carbon in buildings that have longevity, and tree removal - appears to be regarded as irrelevant by the planning agenda. And yet we are told daily that climate change is the greatest threat we face. Developers show no respect for this fact and will not do so without policy teeth being introduced.

*I support the LGA Submissions to this review process dealing with the matters above and trust that sense will prevail before our suburban environment is further affected.*

Thank you for the opportunity to comment.

Regards

*Elizabeth*

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