



Southern & Hills Local Government Association

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Adelaide Hills Council | Alexandrina Council | Mount Barker District Council | Kangaroo Island Council
| City of Victor Harbor | District Council of Yankalilla |

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13 FEB 2020

State Planning
Commission

7 February 2020

The Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Dear Mr Lennon

The Southern and Hills Local Government Association (SHLGA) welcomes the opportunity to provide a response to the Draft Planning and Design Code (the draft Code) released for public consultation for phase 3 Councils.

The SHLGA was first formed in July 1969 and is now constituted as a Regional Subsidiary under Section 43 and Schedule 2 of the Local Government Act 1999. The SHLGA consists of six (6) local government Councils:

- Adelaide Hills Council;
- Alexandrina Council;
- Kangaroo Island Council;
- Mt Barker District Council;
- City of Victor Harbor; and
- District Council of Yankalilla

Collectively these six (6) Councils have:

- More than 127,000 people as at 30th June 2018;
- An ocean coastline of 652 km;
- The region has extreme diversity from the foothill suburbs of Adelaide to the isolation of the inaccessible west coast of Flinders Chase National Park;
- Significant areas within the region are under primary production use, which include highly productive farm, horticulture, viticulture, forestry, fishing and intensive animal keeping enterprises and in the more undulating parts sheep farming, cereal growing and dairying;
- The region contributed nearly \$3 billion in gross value to the State economy in 2006/07 or 4.4% of gross state product;
- The region also contains significant growth pockets both in population and development, placing demands on infrastructure and the natural environment; and
- Within the region, The Adelaide Hills, The Fleurieu and Kangaroo Island are all major tourism destinations. Kangaroo Island is a major component of the Australian and SA tourism plan with tourist numbers targeted to double over the next decade

As evidenced above, the SHLGA covers a diverse region facing a wide variety of development issues which will be greatly influenced by the draft Planning and Design Code (Code). I'm sure each Council will represent these specific issues effectively in their individual submissions. However, I urge the Commission and DPTI to adequately consider these submissions and respond accordingly by allowing inclusion of elements such as desired character statements to be incorporated in the Code as Technical and Numeric Variations. Doing so will enable standardised zonings and policies to address local differences in character and amenity of our region, and thereby protect and enhance these going forward.

The SHLGA recognise that the Planning Reforms and the development of the Draft Code is a significant undertaking and support the intent of the planning reforms to modernise and improve the states planning system. The SHLGA certainly supports the notion that a modern planning system is fundamental for South Australia, as it will ensure our state remains liveable, prosperous and vibrant.

It is noted that the draft Code seeks to implement a consistent State-wide approach in regards to the structure, content and understanding of development zones, policies and provisions. However, it is considered that this has resulted in a code which is largely urban centric and fails to recognise and incorporate policy which best guides development in rural, regional and township settings.

Of significant concern to the SHLGA is the loss of development policy which addresses the local nuances of our diverse region. With this in mind it is considered that our councils are set to lose these significant elements of policy detail, as well as existing highly effective planning policy tools, which have been developed proactively to protect, enhance and enable appropriate development in the region consistent with the 30 Year Plan for Greater Adelaide. Much of this soon to be lost content has been developed in consultation with our communities, and has been subsequently refined over many years to provide for robust development policies which achieve the desired planning outcomes for our region. The existing development policies also represent a significant investment of both public money and the time and expertise of councils, as well as the goodwill of communities and stakeholders involved in the policy development process.

It is therefore the SHLGA's recommendation that the Code allow for a degree of diversity to recognise local nuances in character in the region. This can be achieved by allowing for discretionary local specific policies or Technical and Numeric Variations (TNVs), thereby reflecting the differences of local places and context. Typically, this has occurred through the use of Desired Character Statements that detail the unique and different character, history, values and local aspirations of communities. The SHLGA would therefore support the reintroduction of these Statements as TNV's which would ensure local nuances and quality existing policy recognised in the Code.

The SHLGA notes that the consultation version of the Draft Code is a large, complex and complicated document. This complexity was meant to be supported by implementation of a working version of the Planning Portal. Unfortunately this was not released with the Code. This lack of ePlanning integration and the sheer size and complexity of the document has hampered much of the ability of the councils' and communities' to accurately review the content as it applies to them. This matter is of specific concern for the SHLGA given the diverse range of policies which apply to the region and limited ability for communities to understand the potential impacts of the Code.

The SHLGA see value in the intent of the reforms but urges the Commission to work collaboratively with Councils and the LGA to ensure the Code reflects the values, character, history and aspirations of our communities.

Please do not hesitate to contact myself or Graeme Martin, Executive Officer of SHLGA, should you wish to discuss this matter or require further information.

Kind Regards

A handwritten signature in blue ink, consisting of a stylized 'K' followed by a horizontal line.

Keith Parkes
Chair SHLGA