

From: [Stephen Dowd](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Draft Planning and Design Code
Date: Wednesday, 19 February 2020 3:32:38 PM

I am sceptical of a number of the planks put forward in advance of the proposed Code, and my scepticism fundamentally relates to suggested need. Accordingly I will address that below.

1 Assessing need/desire by an assessment of what has been built in the last decade:

This assessment measure is an inadequate tool. The Adelaide City Council has encouraged higher density, higher rise, accommodation in the city by offering various financial assistances (really perks) to first time occupants in order to make the city “more vibrant.” For that reason merely pointing to the presence of such development does little to underscore either need or want.

That it is accepted that many of the apartments’ occupants are international students points to no local need either.

What has been developed by developers (in particular the knock it down build two detached in its place approach) is arguably not so much an indicator of want, but supply. Perhaps there are simply better “margins” in this approach for a developer to build two essentially the same 350 sq m “boxes” where one house once stood.

2 Population growth: SA’s growth to 2016 was the third lowest in the country (some 4.5%), ahead of only Tasmania and the NT. With real estate values ascendant again in Sydney and Melbourne, a good case can be argued that many retiring sea changers will take the money on offer there and spend significantly less by buying in and moving to Tasmania. If growth in that state hasn’t overtaken growth in this state already between 2016 and 2019, arguably it will soon. The very evidence advanced on the topic of population demonstrates that looking forward this State will increasingly have one and two person households, in many cases comprised of persons 65 years and older. Put simply, there is no inherent South Australian pressure for smaller, more affordable housing.

Neither of the above points suggest any need for this proposed “reform.”

3 Some argument for reform can be made in the nature of permitting smaller block sizes.

Logic demands that as we age it becomes more difficult to care for and maintain lawns and gardens. By no means can the majority afford third party maintenance, and water costs bite into available funds. Accordingly, it maybe that for many of us, as we age, a smaller block may be both beneficial and desirable.

I can’t help but think that the entity best able to assess its constituents’ needs in that regards is the one closest to them, and that is their local council. Rate payers can take more effective and decisive steps to influence their council at elections than they can influence this state’s government’s elections because elections are more intimate at the local level.

For these reasons alone I am against the adoption of the proposed code.

Sincerely,
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