

Community Alliance SA Inc
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The Hon John Rau
Deputy Premier
Minister for Planning
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Dear Minister,

Submission on the Expert Panel on Planning Reform's "The Planning System We Want"

The Community Alliance SA is an umbrella organisation for resident and community groups from across Adelaide and other areas of South Australia, whose aim is to put the community back into planning and development.

We thank you for this opportunity to provide further feedback on the outcomes of the planning review process, as detailed in the final report from the Expert Panel "The Planning System We Want". We have found our involvement in the Planning Reform Reference Group to be quite valuable in looking at the issues involved in reform of the Planning System from the different perspectives of all of the group members.

The Community Alliance SA made a quite detailed submission in September 2014 in response to the Expert Panel's "Our Ideas for Reform"; unfortunately we have found that many of the concerns and issues raised in that submission were not addressed in the final report and there remain many concerns amongst our membership. We have endeavoured to communicate these concerns as constructively as possible, as we do want genuine planning reform that adequately addresses community concerns and social and environmental impacts.

We believe that the primary objective of the reforms ideas as they currently stand are to facilitate rapid development with little regard to social and environmental impacts and sustainable development. While the final report includes a number of reform ideas that seem attractive if taken at face value, the lack of detail makes it almost impossible to support or oppose a proposed reform outright. As always, the devil is in the detail, and the final report largely lacks detail on the actual changes proposed.

One of our primary concerns is the failure to address social needs and objectives, and the lack of attention given to sustainability and protecting the environment. The focus remains on creating a technical system and placing decision-making almost entirely in the hands of professionals.

The report vastly understates the fundamental importance of social considerations and the need to genuinely engage with community and hear their views. It also overlooks the “value-add” that occurs when the community is engaged in the planning process (a true win-win!), as well as the valuable role that Council’s play in policy making and engaging with their community (particularly Elected Members).

Our members have commented that the reforms don’t describe a better system than the current one and indeed that the implementation of a technical framework as described could produce a far worse system from the community’s point of view. Goals and principles are needed to give direction and must be based on achieving sustainability with respect to social, environmental and economic considerations. The goals need to be set out upfront in new planning legislation in order to be effective.

We appreciate that the panel envisages community participation occurring at the strategy and policy level and we agree that it is essential to have meaningful engagement upfront in the planning process. However, the Community Alliance SA and its members are greatly concerned at the recommendations in the report, which would remove or significantly lessen council and community participation at the level of development assessments.

In theory, if engagement in strategy and policy making is effective and genuine, then the community would require less input into development assessments (without the need for a system designed to exclude community input!). However, development applications have a level of detail not present in the strategies and policies that guide them. Community members may find it difficult to relate to abstract “policy” and motherhood statements, but are mobilised when the house next door is demolished and replaced with multi-storey dwellings overlooking their backyard. In many instances, local council and community input would result in a better outcome, rather than simply allowing any development that is seen to conform to a policy.

It is therefore essential the community is given an appropriate opportunity for engagement in the development assessment process, particularly for large or substantial development proposals or ‘merit’ proposals.

Feedback on Reform Proposals

As stated earlier, it is not possible to say outright whether the Community Alliance SA supports each recommendation or not. Any support stated here is for the overall concept and is highly conditional on suitable measures and detail being put in place.

The attached table considers each reform in turn and contains comments and questions raised by community members at briefings organised by the Community Alliance SA on the “Our Ideas for Reform” report, and at a recent workshop for our members when we worked through “The Planning System We Want”.

The Community Alliance SA also supports the submissions made by the Environmental Defenders Office and the Conservation Council SA in response to “The Planning System We Want.”

Lastly, we would like to thank you for the opportunity for the Community Alliance SA to engage in the planning review process as part of the Planning Reform Reference Group. It has been particularly beneficial and enjoyable to have had discussions and a sharing of ideas with the other members of the Community and Interest Groups Working Party, and also to have learnt from and recognised commonalities with other groups, including members of the planning profession, development industry and local government.

We look forward to continuing to work with the Department to create “The Planning System We Want”, as we have a way to go before we reach that goal!

Yours Sincerely,

Tom Matthews, President
Community Alliance SA