

Community Alliance feedback to the Expert Panel for Planning Reform				February 2015	
#	Reform	Comments on the Reform: Does it address key Community Alliance concerns? Outline of our concerns with the Reform.	Rating	Further issues that need clarification.	Suggested improvements to the Reform.
1	Establish a State Planning Commission	<p><u>This reform idea is generally supported, however the deletion of some recommendations has changed it from Green to Orange: not all key concerns have been addressed.</u></p> <p>The composition of and mechanism of appointment to the proposed planning commission is critical. Appointments being made for political reasons must be avoided. (Members must have knowledge of planning, infrastructure, urban design, environmental, social, health and heritage issues for example).</p> <p>There needs to be more clarity and defined criteria for which development applications would go to the planning commission for assessment and which would remain with DAPs, particularly with respect to major projects.</p> <p>Deletion of the words "The commission should make its advice publicly available wherever possible." from the original report is a concern. We support the panel's recommendation that the commission should make its advice publicly</p>	Orange	<p>Where do the commission members come from?</p> <p>How will the State Planning Commission be funded?</p> <p>Criteria for which development applications would go to the planning commission?</p> <p>Details on what community consultation will be undertaken by the commission?</p> <p>Publication of advice?</p>	<p>When high-level advice is provided (Reform 1.2) to the Minister and Cabinet, it should be visible on the internet on the same day, so the public understand the full context in which decisions are made, why they have been made, and what issues may not have been addressed.</p> <p>This would address "a perceived lack of transparency" and would "help citizens participate in and understand decisions that affect them and reasons for them" (Guiding principle in Appendix 3).</p>

		<p>available wherever possible.</p> <p>The proposal has merit but the benefits of a Planning Commission as such will only be demonstrated down the track if in fact the roles of Cabinet and the Minister of Planning are restricted to setting strategies and over-arching policies and do not have direct involvement in administering the planning system and in determining matters such as rezoning, development plan amendments and the declaration and assessment of major projects.</p>			<p>The last two paragraphs on Page 128 emphasize the need for a cultural change, with a completely online planning system. We think to achieve public confidence, transparency is essential.</p>
2	<p>Create a network of regional planning boards across the state</p>	<p><u>This reform idea is not supported; key concerns have not been addressed.</u></p> <p>The Community Alliance SA supports some regionalisation of planning and policy making, but not in the form proposed. We do not see any merit or benefit in a “network of regional planning boards” and are strongly opposed to their formation, particularly for the metropolitan area.</p> <p>It seems boards would be mostly comprised of professionals, but councils as a whole would not be involved in decision making. This would further erode local representation and accountability by placing community members further away from the body making decisions about policy in their local area and region.</p> <p>This suggested reform also goes against the Government’s recently announced policy to abolish boards to reduce costs, unless they can justify their existence. We are concerned that</p>	Red	<p>How will the Boards be composed and appointed?</p> <p>What roles will councils play in planning and policy making?</p> <p>How will Councils interact with and influence the Regional Boards?</p> <p>Councils already consult with each other when setting policy; the Planning Commission could have oversight of this process - why create another level of bureaucracy?</p> <p>What roles will Council Elected Members play? How will they be involved in the development of policy and in</p>	<p>Further consideration is needed on the composition and appointment of members if this reform proceeds, to ensure that each council within a region is involved in the decision making.</p> <p>The Community Alliance SA would give more support to a model as proposed by the LGA (SA) [draft submission], whereby councils work together with oversight by the proposed planning commission.</p> <p>Consideration should be given to using (existing)</p>

		<p>Reform 2 will dramatically increase council rates with little/no benefit to ratepayers, as co-contribution from the State will be minimal. Policy planning functions are already provided by Councils with oversight from DPTI; why complicate this?</p> <p>This reform appears similar to the rationale often used for Council amalgamations, when a more effective method to achieve consistency of approach and cost efficiencies is to share services across council boundaries through regional alliances. Apart from introducing further “red tape” and inefficiencies, the loss of geographic distinctions and a watering down of local influence in decision making to the detriment rather than the benefit of local communities is a key concern.</p> <p>Planning issues may not “stop at Council boundaries” but the same could be said for regional boundaries. The task of assigning regional boards based on commonalities, if adopted, would be very complex.</p> <p>While consistency of approach is a good idea; if it is used to override important local considerations it will not be useful. The planning system should allow for and recognise local differences that do in fact occur within Council areas for good reasons. A “one size fits all” approach is not appropriate.</p> <p>It is much more effective to have consultation undertaken locally than from a central agency; provided that Councils are held accountable by</p>		<p>advocating on behalf of their communities?</p> <p>How will the Boards be funded?</p> <p>How will the regional boundaries be determined and costs assigned?</p> <p>How will the community influence Board policy making?</p> <p>How will the Boards be accountable to the community?</p> <p>What will be the avenues for achieving a review of a Board decision?</p>	<p>Regional Alliances of Councils in place of the regional boards. This model would avoid creating a further layer of bureaucracy and maintain Councils’ influence over policy. NRM Boards provide a good example.</p> <p>Committees or working groups could be established as needed and as appropriate for regional planning issues, rather than having a set rigid structure.</p> <p>Neighbourhood Planning Advisory Boards (sitting below Councils and comprised of community members) have been used in the UK to actively involve the community in providing advice and feedback on planning policy matters to Councils; this seems like a good strategy to achieve consistent and meaningful community</p>
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		the planning commission for the success or otherwise of their consultation processes. The commission could fulfil an important role here in improving practices and addressing the “poor performers”.			engagement on complex policy issues.
3	Legislate to create a charter of citizen participation	<p><u>This reform idea is generally supported; however the ideas are somewhat conceptual and lack detail.</u></p> <p>The Community Alliance SA agrees with the panel’s recommendation that a charter of citizen participation should be statutory. For the charter to be effective, it must be enforceable.</p> <p>The Community Alliance SA agrees with the recommendation that the IAP2 guidelines would be adopted.</p> <p>The reform ideas propose that agencies and councils will be required to develop engagement plans consistent with the charter. Rezoning changes are an example where citizens may not understand the proposal or be directly notified, when they should be.</p> <p>The charter of citizen participation must not be limited to involving the community in the development of policies. It sounds fine in theory to espouse early community engagement in the setting of policies, but to have any real value it must extend to meaningful consultation on individual development applications that directly affect individuals and the communities in which</p>	Green	<p>What does 'streamline engagement' mean? (We need more detail about this as it can be read in two ways; making the system less complex and easier to understand; or cutting out steps and reducing the ability to influence the outcome?).</p> <p>What will be done through legislation to give the charter some <i>teeth</i>?</p> <p>What will be done to encourage compliance with the Charter?</p> <p>Will community members be entitled to have input into the planning assessment process where a decision will directly affect them?</p> <p>Who can they go to, to obtain meaningful assistance in translating their concerns?</p>	<p>Ethical guidelines need to be spelled out.</p> <p>Will still need non-optional (minimum) consultation measures included as a basic “safety net”; should not be totally discretionary.</p> <p>Need to have greater clarity around development assessment consultation processes and rezoning processes.</p> <p>The charter must be geared towards the provision of alternative scenarios in the early stages of engagement. As well as relating to the setting of strategy and policy, this should also apply to the process for large or complex proposals (eg shopping</p>

		<p>they live.</p> <p>Community engagement must be part of the development assessment process as well as the development of strategies and policies.</p> <p>Dissatisfaction with current development assessment processes is a key community concern. It is unrealistic to expect most residents to become involved at the policy setting level. As a general rule it is only when residents are likely to be directly affected or adversely impacted by a particular development application that they will see the need to become involved.</p> <p>We question the need to speed up processes for the benefit of developers at the cost of the rights of the existing residents in an area. Speed of approval does not necessarily achieve the best result for either party. Forcing change creates dogged resistance, increases costs and results in reputational damage.</p>		<p>What ensures an ethical approach, and not just “ticking the boxes”?</p> <p>How will engagement performance and success be measured?</p> <p>Who will receive and assess complaints?</p> <p>What measures will be introduced to ensure transparency and accountability?</p>	<p>centres) where early community engagement would in most cases result in a better outcome and save time and money.</p> <p>Effective community engagement for complex matters should include independent assistance to community members to ‘translate’ their needs or issues into suitable outcomes. This should replace the current practice of summarising and diluting community concerns in assessment documents (in essence ignoring the concerns rather than finding a way to address them).</p>
4	Engage parliament in the development of planning policies	<p><u>This reform idea is generally supported.</u></p> <p>Replacing the ERD Committee is a good thing as it is currently ineffective.</p> <p>Parliamentary scrutiny should not be restricted to strategic plans and state-wide planning policy and must extend to the rezoning process. The State has seen highly controversial rezonings in the Mt Barker, St Clair, Gawler East and Capital City DPAs,</p>	Green	<p>If the ERD Committee is removed, what will replace it?</p> <p>What is the review or oversight process if the Planning Commission gets it wrong or overlooks relevant issues?</p>	<p>The LGA's recommendations are supported in this context. The committee should act as a conduit between Parliament and the State Planning Commission, being concerned only with</p>

		<p>to name a few.</p> <p>Measures need to be robust to ensure that parliamentary scrutiny is meaningful and effective, and not just a rubber stamp for decisions already made. This will depend primarily on the composition and appointment of any committee involved in the scrutiny process.</p>			<p>policy and state-wide issues.</p> <p>Need further detail about where to go for review of a rezoning decision; this is not clear in the document.</p>
5	<p>Create in legislation a new framework for state directions</p>	<p><u>This reform idea is not supported; the lack of detail has changed it from Green to Red; key concerns have not been addressed.</u></p> <p>It is unclear what level of detail is intended to be included in the “directions”. Apparently the aim is to standardise uniform development across a region.</p> <p>It appears the Minister has too much discretion here. The directions must be approved by Parliament before coming into force.</p> <p>If the document is too high level will the community know what they are responding to (if they get the opportunity to)? Directions need to be made meaningful to ordinary people.</p>	Red	<p>What community consultation will occur in the development of the framework?</p> <p>What happens to the 30 Year Plan? What is this reform changing?</p> <p>Does this replace the Section 30 reviews and become more “arm’s length” from the community?</p> <p>Is the existing process so bad? Is this a retrograde step?</p>	<p>We believe 5.4 should include advice from the State Planning Commission, after appropriate community consultation.</p> <p>The directions must conform to goals and principles set out for the planning system by legislation that addresses social and environmental considerations.</p>

6	Reshape planning documents on a regional basis	<p><u>This reform idea is not supported; key concerns arise from the lack of detail.</u></p> <p>The approach of the 30 Year Plan to retention of existing character areas seems to have been lost along with all the good work establishing unique precincts such as Coromandel Valley Policy Area 43 (City of Onkaparinga). Whilst the supporting text says "Neighbourhood character issues will be reflected through the use of more tailored local policies for specific areas..." none of the eight subheadings 6.1 to 6.8 seem to allow for more than a minor "change". Also what guarantee is there that a future regional level policy does not completely obliterate a long standing local character policy?</p> <p>This concept will take the local aspect out of development plans. The aggregation of existing Development Plans into a Regional Planning Scheme will serve to remove the local aspect from the planning process and to distance local councils and local communities from the decision making process. There may be some merit in a regional approach in country South Australia but this should not be translated to the metropolitan area.</p> <p>Contradiction of the principles of good community engagement espoused elsewhere.</p>	Red	<p>What happens to current Development Plans and all of the work put into these in recent years?</p> <p>P57 suggests a straightforward flow - what happens where there are changes? Are the community consulted on these?</p> <p>Where is the "community" box in the flow chart?</p> <p>What stops delays occurring in the approval of the plans?</p> <p>What is the cost vs benefit?</p>	<p>Mandatory KPIs are required for timeframes for the authorisation of DPAs, plus visibility of progress against the timeframe.</p> <p>Timing is important; having greater local authority with oversight from the Planning Commission would be an improvement on the current protracted process.</p> <p>Online publishing of progress eg forecast and actual dates for each milestone in the process would also assist in improving accountability.</p>
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7	Establish a single state-wide menu of planning rules	<p><u>This reform idea is generally supported.</u></p> <p>Although the Community Alliance SA generally supports this reform idea as a concept, there needs to be a much higher degree of certainty that local variations, with respect to character and heritage in particular, will be afforded protection and that local communities and councils will be central to any changes proposed to these. We do not see the need for a reduction in the number of zones. Different zones acknowledge the very real differences in individual areas of a local council area due to land uses, streetscape, building density, bulk and scale.</p> <p>There is also particular concern that frequent updates will be made 'centrally' by the planning commission and that these will make sweeping changes across the board.</p>	Green	<p>A menu indicates that a "selection" may be made as applicable. More detail is required on how this selection will be made and by whom?</p> <p>How will local variations be reflected?</p> <p>Who will be consulted and when?</p>	Flow chart is missing "Community"; the community must be involved in changes that affect them. What is selected from the "menu" should be influenced by community aspirations.
8	Place heritage on renewed foundations	<p><u>This reform idea is generally supported if it assists with retention of heritage; there are key concerns that the lack of detail may achieve the opposite outcome.</u></p> <p>We agree that the current cumbersome and time-consuming DPA process is not appropriate for reviewing heritage listings.</p> <p>Concerns expressed in our September submission remain. For inner suburban communities with a lot of existing character areas these are very important issues.</p> <p>We have concerns around the proposed use of</p>	Orange	<p>Is this reform going to remove "contributory items" from "historic conservation zones"?</p> <p>What are 'quasi' heritage items? (This seems demeaning of existing heritage items?)</p> <p>Who will select "accredited heritage professionals" and on what basis? Should they be trained but by whom?</p>	It is 'quasi' heritage terms not items . We agree with 8.2 that heritage related terminology needs to be standardised. The original sub-reform which read "10.1 Heritage should be recognised in the planning system as relating to place, culture and community development, and not

		<p>accredited heritage professionals performing functions for private property owners and there are doubts that this would give an unbiased approach aimed at the best heritage outcome. There could be a role for them giving advice rather than making certification.</p> <p>Although we support a system that gives more clarity, the items currently listed as “contributory items” should not lose any of their protection. Any moves to abandon contributory items will be strongly opposed as they have been very effective in protecting the character of streetscapes.</p> <p>Any individual or organisation should be able to nominate an item for local heritage and contributory status as well as state heritage listing (or whatever categories are proposed in the future).</p> <p>A robust system is needed to ensure that heritage status is not removed inappropriately and that a rigorous, transparent and accountable process is followed.</p> <p>Other measures, in addition to the financial subsidies proposed for private owners of listed properties, need to be considered to ensure that listed properties are properly maintained and not allowed to fall into disrepair whereby demolition is likely to be given approval.</p> <p>There is no mention of how "professionals" will determine historical value, nor any mention of consultation.</p>		<p>How will the “professionals” determine historical value?</p> <p>What consultation will be required? (Eg currently a contributory item may be demolished with only the notification of adjoining owners, when its removal may affect the whole streetscape).</p>	<p>simply physical structures." should be retained (as 8.1).</p> <p>8.4 is good. We believe that any two "accredited heritage professionals" may have quite divergent opinions.</p> <p>The legislation around Contributory Items should be strengthened to ensure that they are retained. If they must be removed, a replacement dwelling must be erected that fits the character of the streetscape. There are examples where single dwellings have been removed after falling into disrepair, only to be replaced by multiple dwellings that are totally inappropriate and do not “fit”.</p>
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		Local residents and community groups need to be involved in the consultation process for development assessments in heritage and character areas as they often have a better knowledge of the area than council staff or other appointed professionals.			
9	Make changing plans easy, quick and transparent	<p><u>This reform idea is generally supported in terms of improving the timeliness of Development Plan updates; however it requires more detail.</u></p> <p>It is not clear how allowing ‘approval of a rezoning program rather than individual rezoning approvals’ would be consistent with having genuine and community engagement upfront in the process. Rather it would seem to exclude meaningful consultation.</p> <p>Allowing a wider range of parties to undertake rezoning should take a back seat to the need to achieve the best planning outcome and for communities to be engaged about how an area should be rezoned (in line with the planning directions and strategies).</p> <p>KPIs and clear timeframes are required here. It's important to have accountability in the process of changing Development Plans.</p>	Green	<p>What is the review mechanism?</p> <p>How is progress measured and tracked?</p> <p>What is Councils’ role in this process?</p>	<p>Parliamentary oversight should be retained and strengthened for significant rezoning proposals.</p> <p>Interim operation criteria should be tightened to focus on preventing adverse outcomes; <i>precluding rather than enabling development.</i></p> <p>An online tracking system is required.</p>

10	Adopt clear, simple development pathways	<p><u>This reform idea is not supported; key concerns arise from the lack of detail.</u></p> <p>We support reform 10.2, provided that in Historic Conservation Zones (HCZs) structures such as fences and sheds that will impact upon the heritage streetscape are not excluded from proper heritage and development assessment. This will ensure the integrity of HCZs.</p> <p>We would be somewhat concerned if the definition of “development” was sufficiently diluted such that there were insufficient controls on land use and development that saw an adverse impact on character and amenity.</p> <p>Although we support better notification processes, there seems little point in posting notices on site if neighbours and residents' groups are not permitted to view plans or comment on proposals.</p> <p>A key concern is that the proposed “Checklists” will be like the “Residential Code”; this is too loose and will be a disaster. The one-size-fits-all approach does not work. This looks like just “tick and flick”!</p>	Red	<p>Will these 4 new assessment categories replace the Cat 1, 2 & 3 or 'merit'?</p> <p>How will the community expectations be understood if there is only a checklist?</p> <p>Who is the “user” in “user friendly”? (The citizen or the developer or both? How will both be catered for?)</p> <p>How will we avoid a “tick and flick” approach?</p>	<p>This is a most critical reform and would need much more information.</p> <p>Review of actual assessment timeframes shows that the vast bulk of existing assessments are completed within the required timeframe; KPIs are important to demonstrate the success of the process.</p>
11	Take the next steps towards independent professional assessment	<p><u>This reform idea is not supported; key concerns have not been addressed.</u></p> <p>The Community Alliance SA and its members are greatly concerned at the removal of development assessments from local council DAPs to regional DAPs and see this as removing the assessment</p>	Red	<p>We are concerned about the extended role that private certifiers will play in the development approval process. Do they have the interests of local communities and individual</p>	<p>If DAPs are replaced the loss of local community input must be addressed. There should be a role for Council Elected Members to advocate for their</p>

		<p>further away from the desires, preferences and knowledge of local communities.</p> <p>The proposed regional DAPs would have accredited professionals as members, with the ability to co-opt specialist professional members. This is heavily stacked towards achieving a highly technical assessment of development applications, and lacks a focus on council and community desires and preferences particularly in relation to 'character' and 'amenity'. This proposal removes local communities from the decision-making process on developments that directly affect them. It is alarming that panels will only call on local council members for discussion on developments relating to a councillor's council area, but will not entertain their participation in decision making.</p> <p>The Community Alliance SA already has concerns about the recent extension of private certification for some development plan consents, in particular around the decision being made by an individual who is not acting independently (a private certifier would be employed by a client – the proponent of the development). There are also concerns with accountability, responsibility, enforcement and auditing.</p> <p>This reform takes the planning away from the local community. Further distancing community and elected council members from the planning process is a backwards step and will not end well. It is also somewhat patronising of Elected Members and implies that Elected Members have</p>		<p>residents as their main priority?</p> <p>How are disputes handled and by whom? This has the potential to end up in a complete mess, with no-one being prepared to take responsibility for decisions. In particular Councils may start refusing to "own" the decision of a Regional DAP or to mount a defence of them.</p>	<p>community.</p> <p>Opportunities for the community to make representations also need to be addressed.</p> <p>11.9 says preliminary decisions will be made by the local Planners, which means elected members will not have the ability to represent the local community concerns if the application goes on to a regional panel for decision. This will introduce another level of bureaucracy and complexity – the ramifications of this need to be carefully considered.</p> <p>Experts do not always understand or appreciate the community context in which decisions are made. If this reform was to proceed, there are a lot of checks and balances that would</p>
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		no expertise/knowledge to add; we do not agree with this position.			need to be introduced.
12	Clarify the approval pathways for projects of state significance	<p><u>This reform idea is generally supported in terms of clarifying approval pathways; however it requires more detail.</u></p> <p>The process around major projects requires substantial reform; however it has not been sufficiently progressed by the reform ideas.</p> <p>Some parts are enthusiastically supported, particularly 12.6 - bringing mining development under the same general guidelines.</p> <p>Seen as positive if it enables Environmental Impact Assessments to be undertaken more readily; negative if EIS avoided.</p> <p>The reform idea makes sense if it is used appropriately. This would enable projects beyond/crossing several council boundaries to be assessed more broadly.</p>	Green	<p>What will be the EIS criteria?</p> <p>Will Environmental Impact Assessment criteria be part of the State Planning Rules/Code?</p>	
13	Streamline the assessment of essential infrastructure	<p><u>This reform idea is generally supported; however some key concerns are not addressed.</u></p> <p>The requirement for environmental impact assessments on major projects and “essential infrastructure” needs to be specifically dealt with. They should not be subject to “fast-tracking” to avoid an EIS.</p> <p>If used appropriately the Community Alliance can see benefit. This should counter the developers’ approach of “build first and the infrastructure will</p>	Orange		

		follow” (funded by the ratepayer!). There have been too many examples of major housing developments without appropriate infrastructure; this would help to pick up the lack of infrastructure planning in DPAs such as occurred in Mt Barker.			
14	Make the appeals process more accessible and accountable	<p><u>Making the appeals process more accessible is supported; however the reform ideas seem to reduce appeal rights.</u></p> <p>If it can be simplified without clogging up the courts so much the better. However legislation would have to be strong to prevent bypassing of the process.</p> <p>Reform is necessary in regard to the cost factor that makes the appeal process too much of a financial risk for most community members. Desk top reviews/Tribunal process may enable more citizens’ appeals. Less daunting and costly process needed for independent review of DAP decisions.</p>	Orange	<p>Is this allowing the community to access the appeals process more easily and cheaply? How?</p> <p>Retain existing DAPs to review decisions? Look at LGA feedback on this. Why can't a bad planning decision be reviewed by the full Council?</p>	<p>More detail needed on desk-top reviews and the future of the ERD Court.</p> <p>Have a better mediation process pre DAP so a DAP meeting may not be required. Have better clarity and advisory service up front to protect planners.</p> <p>Also need to address the process for the vast bulk of decisions done under delegation. Eg what happens when something is incorrectly categorised?</p>
15	Provide new and effective enforcement options	<p><u>This reform idea is generally supported.</u></p> <p>Not much detail but hopefully it will influence better behaviour. This should give the legislation more teeth and match the penalties with the scope of the development. We hope this may also address the imbalance that arises from wealthy</p>	Green		

		litigants who are prepared to use every avenue to get an approval, compared to those who cannot do this and have to live with the outcome.			
16	Reinforce and expand precinct planning	<p><u>This reform idea is not supported; key concerns have not been addressed.</u></p> <p>The urban renewal legislation of 2013 was widely condemned by community groups, particularly as it can be used to remove community input further from the normal process.</p> <p>The implications of precinct-based urban renewal are unknown. If the aim of the planning review is to improve other aspects of the planning system, for instance to make processes more streamlined, then how does this reform help to achieve this?</p> <p>The legislation that already exists could potentially be used for all manner of developments (including greenfields developments) that would be more appropriate to go through the normal rezoning and development assessment processes. Any new legislation would need to have specific and appropriate criteria regarding its use.</p> <p>The concern is that this approach just looks at the precinct and not across the broader neighbourhood; this risks a blinkered, "island" approach with the new precinct not interfacing well or impacting on the surrounding community. For example: In Bowden, streets within the new BUUV precinct interfacing with streets outside of the "precinct" – no overall traffic management</p>	Orange		<p>There should be an "opt-in" process for Councils to use the precinct approach if they think it will assist with planning urban renewal; it should not be imposed on them.</p> <p>Precinct planning would be supported provided any private sector planning is well supervised by the local Council and contingent on strong community engagement and consultation necessary for success.</p>

		<p>approach as Renewal SA only looking at the BUW area and not looking at the whole neighbourhood holistically.</p> <p>Placemaking approach is supported, but care needs to be taken to integrate the precinct with the broader community and not end up with “demarcation” disputes between the precinct authority and the local Council, at the expense of local communities.</p>			
17	Settle and deliver an infrastructure funding framework	<p><u>This reform idea is supported.</u></p> <p>These changes are long overdue and will put more rigour and control into infrastructure investment.</p>	Green		It is important that the framework should be in place before finalising any development approval.
18	Integrate open space and the public realm in the planning system	<p><u>This reform idea is generally supported; however, more detail is required for what this reform idea is to achieve.</u></p> <p>The reform ideas might lead to a simpler system that is easier to navigate, but it is not clear that they would actually lead to the “more effective provision of open space, parks and urban greenery”.</p> <p>Any move to maintain and increase open space and parks is to be commended. We are acutely aware of the scarcity of open space in the Inner-Rim Council areas particularly. The nature of infill development experienced in these established areas is such that developers make a contribution to the Open Space Development Fund and do not provide any open space. In fact each development</p>	Orange	<p>What is defined as “open space”? For example, the area under wetlands or underneath power lines being included in 'open space'? (This was written somewhat tongue in cheek, but it is open to being loosely interpreted if not carefully defined. For example the wetlands on the Cheltenham Racecourse were included in the 35% open space promised in the rezoning and the community missed out on their</p>	<p>We note that this reform (previously #21) has been totally rewritten and is somewhat vaguer now. We support open space funds going to the proposed high density residential areas. Whilst the land acquisition costs there are high, the number of users who benefit is great. Contribution to the Open Space Development Fund should be spent locally</p>

		<p>results in a decrease in the amount of private open space and in many cases there is no worthwhile open space with permeable surfaces and anything more than a few token bushes and plants provided. Effectively, we lose open space with every development and funds from the Open Space Fund are spent elsewhere (on projects that do not actually add any open space at all).</p> <p>The removal of open spaces and their replacement with second-rate alternatives such as 'roof gardens' is not supported.</p> <p>There is a danger that a regional focus on open space and parks would lead to blanket provisions over a wide area and could mean that some local communities miss out.</p> <p>Just as farmers need to have a certain amount of open space for healthy horses, sheep and hens, we need this for people too. This should be a requirement in all developments. We need MORE open space in these inner city areas especially. The type of open space eg provision of playing fields for organised sports is also a key issue.</p>		<p>"Regional Park").</p>	<p>to compensate for the loss of open space resulting from infill developments</p> <p>There should be a sliding scale for open space provision related to the density of development. Eg X hectares per Y people.</p> <p>Current open space provisions for subdivisions with detached dwellings on larger blocks and 12.5% of open space should not be applied to denser development. Need more specifics in this reform. Refer to the LGA Open Space research paper.</p>
19	Aim for seamless legislative interfaces	<p><u>This reform idea is not supported; key concerns arise from the lack of detail.</u></p> <p>Consider liquor licensing, environmental assessment and utility requirements. These should be referred to the relevant agency that has the expertise. They often pick up things because they are looking at this with 'fresh eyes'. This reform could have unintended consequences.</p>	Red	Will the planning panels be able to apply permits for liquor licensing, environmental issues etc?	We believe there is still a need for specialist referral.

20	Establish an online planning system	<p><u>This reform idea is generally supported.</u></p> <p>This is common sense, although less-dynamic information should also be available on paper, which is the preferred medium for people sometimes. Centralised database management, particularly enforcement of data standards, should be specified. Otherwise, an attempt to “foster collaborative approaches” could result in unusable data and finger pointing between the commission and councils.</p>	Green		This technological advance is inevitable although we have some concern about extra costs to establish the system being passed on to ratepayers. Database standards are critical.
21	Adopt a rigorous performance monitoring approach	<p><u>This reform idea is actively supported.</u></p> <p>Yes! KPIs for timeliness and visibility of process and outcomes. This is a most welcome reform, particularly if it prevents a repeat of the Gillman fiasco.</p>	Green	<p>What about the performance of the State Planning Commission?</p> <p>Is the State Planning Commission an independent authority here?</p>	
22	Pursue culture change and improved practice	<p><u>This reform idea is actively supported.</u></p> <p>Yes! This is strongly supported. We accept that culture will not change overnight and will require a good deal of training and internal reassessment by incumbents. In particular we would ask that the word "consultation" comes to mean more than: <i>go through the motions, appear to listen - take no action.</i></p> <p>Please listen to your community - they are the experts in community engagement. Culture change won't happen if mistakes are hidden - keep making the same mistakes.</p>	Green	Will the community be consulted in developing the Code of Planning Excellence?	<p>How the reform will be delivered will be very important. To provide 'Service Excellence' you need to involve the community.</p> <p>Visibility of complaints and review mechanisms are important.</p>

