



26 March 2019

Department of Planning Transport & Infrastructure
PO Box 1815
ADELAIDE SA 5001

Via email: DPTI.PlanningEngagement@sa.gov.au

To whom it may concern,

Planning and Design Code in the Outback

We appreciate the opportunity to provide feedback on the Planning and Design Code in the Outback.

We understand that the over-riding objective of the new planning system is to simplify the current system and rationalise the current plethora of often conflicting policies in a clear and concise way to encourage confidence in a streamlined and easily understood system. We are concerned that some aspects in this new code will not contribute to this objective and could likely result in greater complexity, increased red tape and cost to residential building.

To meet the objectives will require a significant component of the performance outcomes to be met by deemed-to-satisfy requirements. This does not appear to be the case with many of the performance outcomes having no deemed-to-satisfy requirements applicable and those that do, particularly where residential builders are concerned, have impractical and costly solutions. Examples of concerns to builders are:-

- The likelihood of increased time delays for approvals. Currently, residential builders using the Rescode can gain Development Approval within 4-5 days, with 10 days mandated, yet even with the best case scenario, under the new system deemed-to-satisfy is 15 business days. Those applications that do not meet deemed-to-satisfy requirements will be directed to the assessment pathways with the very minimum of 25 working days for approval.



- Significant extra information required at application, landscaping plan, overshadowing diagrams, external colour selections, water sensitive urban design assessment, details of waste storage - no deemed-to-satisfy requirements applicable.
- Energy efficiency design requirements over and above NCC requirements with orientation, heating and cooling load and solar access performance outcomes - no deemed-to-satisfy requirements applicable.
- Sites with frontage of 20m or less are only allowed one access point to the road of no more than 3.5m width.
- Screening required for plant (airconditioners) visible above the roof line.
- Setback and private open space requirements that exceed the current Rescode reducing the size of the building envelope.

We understand that the codes for regional and metropolitan areas will be based on the Outback Code and if that is the case there is cause for alarm.

There is much to commend in the Planning Reform proposed with potential benefits such as the introduction of the centralised e'portal for Development Applications however, positive initiatives such as this are likely to be outweighed by overly descriptive and arguably unnecessary and subjective code requirements.

One of the overarching principals of the Planning Reform process should be that any new initiatives should not come at the cost of a negative impact on housing affordability.

To ensure this is achieved, a Cost Benefits Analysis should be undertaken as a priority to identify the impact of the Outback Code on residential building and land supply.

Yours sincerely

James Doyle
Director
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