



27 February 2020

Mr Michael Lennon
Chairman – State Planning Commission

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Dear Mr Lennon

Planning and Design Code Submission – Phase 3 - [REDACTED] Melrose Park

We act for Jose Street Nominees Pty Ltd ('JSN'), the owner of the land generally identified as [REDACTED] Melrose Park and presently disposed as a furniture assembly factory known as Workspace Commercial Furniture.

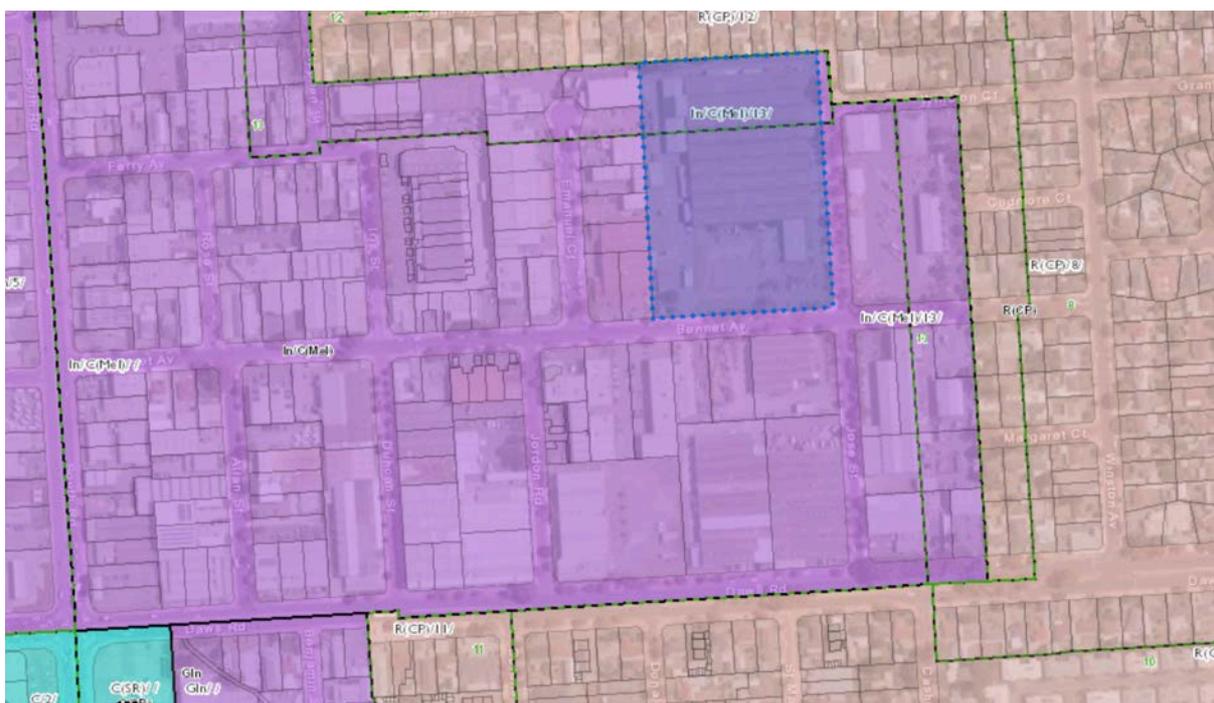
The site is substantial within the context of Melrose Park and has dual road frontage. A regular shaped allotment, the site has a frontage to Jose Street (eastern boundary) of approximately 195 metres, a frontage to Bennet Avenue (southern boundary) of approximately 139 metres and an overall site area of approximately 27,350 square metres.

The subject site and existing zoning as identified by the Mitcham (City) Development Plan is shown by Figure 1 below. This land, along with the Council Depot to the east, forms the edge of the Industry/Commerce (Melrose Park) Zone, which also extends further south to and along the length of Daws Road. The northern edge of the site itself is within the Industry/Commerce Interface Policy Area 13, adjacent the housing to the north of the subject site. The adjoining land to the north of the subject site is in the Residential (Central Plains) Zone, which also extends east of the depot, and south from Daws Road.

Figure 1 Subject Site



Figure 2 Subject Site with Zone overlay



JSN has a vision to eventually redevelop the land for a range of medium density housing purposes, recognising the strategic potential of the site.

We note that the site offers significant potential for medium density residential development at a medium scale on the basis of:

- There is a local centre located at the intersection of Winston and Morgan Avenues, which contains a convenience store and chicken shop. Further north along Winston Avenue are a number of local corner stores and cafes and personal service establishments such as hair dressers;
- The Riverside Medical Clinic is located 600 metres south-west of the site on Daws Road along with the Repatriation General Hospital (located 750 metres west of the site). Approximately 1.3 kilometres north-west of the site is the Castle Plaza Shopping Centre which provides access to a wide range of retail, commercial and community facilities and services including post office and banks;
- There are a number of schools within a 2 kilometre radius of the site including Pasadena High School, Sacred Heart College Middle School, Clovelly Park Primary School and Edwardstown Primary School. Child care centres also exist within 800 metres of the site.
- Close proximity to South Road, Winston Road and Daws Road, being arterial roads accommodating public transport and connection to retail offerings and connection to Flinders University and Hospital;
- close proximity to the Central Business District (6 kilometres);

JSN has a long term vision to:

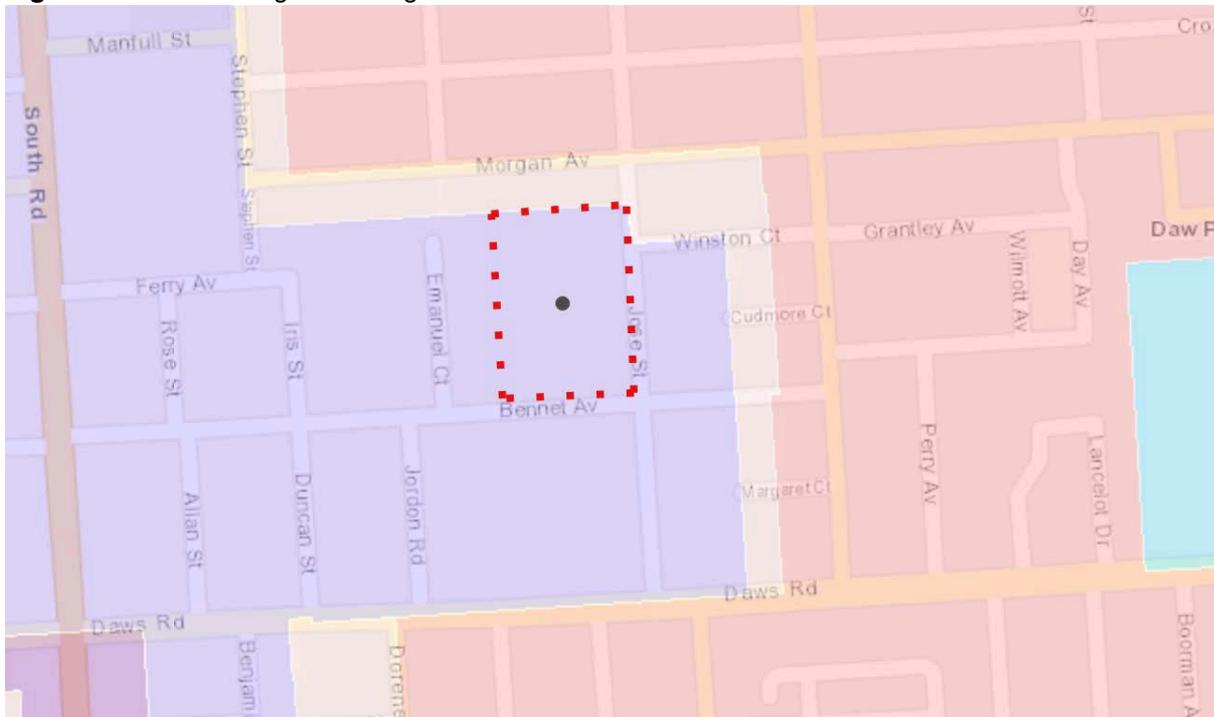
- respect adjacent lower scale built form by encouraging development up to two storeys at these interfaces;
- take advantage of access to retail offering, schools, hospitals, Universities and proximity to the Central Business District by encouraging development of three-four storeys within the centre of the site;
- create high quality landscaped open space through the site and integrate such space with WSUD principles;
- encourage rear-loaded product and maximise on-street carparking and improved public realm outcomes with a high percentage of tree canopy cover; and

JSN recognises that the development potential of the site in the short to medium term will be influenced by the continued operation of Workspace Office Furniture on the subject. The development potential in the longer term will be influenced if existing operations ceased to free-up the whole of the land for a comprehensive redevelopment. In all circumstances, there is a strong desire to appropriately balance the development potential of the subject land with high quality urban design and landscaped outcomes.

Given the vision of JSN, it is opportune to review the draft Planning and Design Code – Phase 3, and to make submission noting the intent to seek a future rezoning.

In terms of zoning, the draft Planning and Design Code proposes to convert the current Industry / Commerce (Melrose Park) Zone to the Employment Zone (highlighted in purple with the extent of the site identified by the red dash line in Figure 3 below).

Figure 3 Draft Planning and Design Code Zone



As anticipated, the draft Code has proposed a ‘like for like’ rezoning. However, in terms of forward planning, noting the medium density residential development vision of JSN, and having regard to the various zones contained within the draft Code, we consider that there is no ‘standard’ zone that fits this particular context.

In our opinion, there is a need for a new Urban Infill Master Planned Zone to be constructed within the Code that better recognises the opportunity that JSN presents. Appropriate Design Guidelines and a master plan should be read in conjunction with the Zone and be used as the mechanism(s) to differentiate similar sites across metropolitan Adelaide.

In our opinion, such a zone would provide the broad policy framework for similar sites, create greater value and amenity for the respective site and locality whilst conforming with the ambitions and intent of the 30 Year Plan for Greater Adelaide and the State Planning Policies (SPP).

We note the proposal would be consistent with the following *Principles of Good Planning* as outlined in the SPP:

Urban renewal principles

- *Preference should be given to accommodating the expected growth of cities and towns through the logical consolidation and redevelopment of existing urban areas.*
- *Urban renewal should seek to make the best use (as appropriate) of underlying or latent potential associated with land, buildings and infrastructure.*

Activation and liveability principles

- *Planning and design should promote mixed use neighbourhoods and buildings that support diverse economic and social activities.*

Investment facilitation principles

- *Planning and design should be undertaken with a view to strengthening the economic prosperity of the state and facilitating proposals that foster employment growth.*

We further note that medium scale residential development in this location would support the following SPP's and associated principles:

1 INTEGRATED PLANNING

Integrated planning coordinates the strategic use of land with the necessary services and infrastructure. It can influence how a city or region grows and evolves, which if done well, creates liveable and sustainable places that contribute to our prosperity.

- 1.7 *Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations supported by infrastructure, services and facilities.*
- 1.8 *Mixed-use development around activity centres, public transport nodes and strategic transit corridors to encourage greater use of active transport options such as walking, cycling and public transport.*

6 HOUSING SUPPLY AND DIVERSITY

Housing is an essential part of people's health and wellbeing. Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations. With the changing composition of our community and our desire to live more sustainably, our housing supply needs to become more diverse in both metropolitan Adelaide and regional township locations.

- 6.1 *A well-designed, diverse and affordable housing supply that responds to population growth and projections and the evolving demographic, social, cultural and lifestyle needs of our current and future communities.*
- 6.3 *Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.*
- 6.5 *Locate higher density residential and mixed-use development in strategic centres and transport corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.*

Should our suggested amendment not be adopted as part of this Phase 3 consultation process, we flag the intent to rezone the Land by way of a Code Amendment process as soon as practical after commencement of the Code. To this end, we have been instructed to commence the necessary investigations to ensure this can be completed as soon as practicable after the Code commences operation.

We would be pleased to further meet with DPTI staff in order to provide further detail in respect to this submission/request.

Yours sincerely

A handwritten signature in black ink that reads 'Chris Vounasis'.

Chris Vounasis
Managing Director