

From: [William Ey](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Draft Planning and Design Code - Submission
Date: Friday, 28 February 2020 7:19:52 PM

To whom it may concern

Thank you for the opportunity to comment on the draft Planning and Design Code. My feedback is in relation to specific areas of the draft code as well as the consultation process.

Existing Cowandilla / Mile End Character Area 23 inconsistent with 'Housing Diversity Neighbourhood Zone'

I reside at [REDACTED] Hilton - currently within Cowandilla / Mile End Character Area 23. Suburbs within this policy area are low density and predominantly comprised of character cottages, victorian-era villas, bungalows etc.

Under the proposed draft Planning and Design Code, parts of Mile End, Torrensville, Hilton and Cowandilla have been rezoned as 'Housing Diversity Neighbourhood Zone.' My understanding is that the intent of the current phase of the Planning and Design Code was to rezone based on 'like for like' with the existing West Torrens Council Development Plan. The stated objective of Cowandilla / Mile End Character Area 23 is 'Development that contributes to the desired character of the policy area.' Key attributes of the desired character of this area are:

- Allotments will vary in size from low density to very low density and are generally deep, with narrow frontages to main streets.
- There will be predominantly one storey buildings, with some two storey buildings designed in a manner that is complementary to the single storey character of nearby buildings.
- Setbacks will be complementary to the boundary setbacks of older dwellings in the policy area, preserving considerable space in private yards for landscaping.

'Housing Diversity Neighbourhood Zone' is clearly inconsistent with the existing Area 23 and the proposal to zone it such is inconsistent with the objectives of the intent of the Planning and Design Code reforms. Further, no rationale has been provided as to why this particular zone has been proposed. **This proposal is a significant policy change from the existing plan.** 'Suburban Neighbourhood Zone' would be the most appropriate for this area, with character overlay.

Infill - Lack of Open Space

I do not doubt the need for increased housing stock and urban infill. However there are principles that must be adhered to in order to make such policies and associated developments successful from a liveability and health perspective. If you look at recent developments at Lightsview and St Claire there is a sense of open space and community - testament to the planning and design principles employed from their inception. While I note that Hilton, Torrensville, Mile End and Cowandilla area not greenfield sites, if there is a policy shift from the current low to very low density, provisions must be allowed for additional open space and community facilities. Moving to medium density cannot come without the community and social infrastructure (parks, open spaces etc.) required to support this fundamental change. The population of an area cannot be dramatically increased through allowing apartment buildings (i.e. the current proposal to shift Area 23 to Housing Diversity Neighbourhood Zone) without giving regard to how these suburbs will accommodate the additional need for parks and common areas.

Lack of Design Quality Principles

I am a strong proponent for housing diversity and regeneration of housing options in appropriate areas. However there is a **distinct lack of regard for design elements in this new code**. While there is a perception that many people are anti-development when commenting on retaining character and heritage housing stock, the reality is that most are actually just sick of incredibly poorly designed, low-quality 'one-off' developments that are now peppered throughout most suburbs. Development of the new Planning and Design Code is the opportune time to create a system that gives stronger regard to design quality principles - however this has been missed in the current draft.

Consultation Process

As drafted, the Planning and Design Code is incredibly complex and difficult for people without planning qualifications to navigate. Documents presented for consultation make it virtually impossible to understand what the new policy area of Housing Diversity Neighbourhood Zone would mean for residents. Under this classification is it possible for an apartment building to be built next to my current home? Can I build a hammer-head or battle-axe development in my rear yard? Can a mechanic open up next door to me? What about a restaurant? Or a shop? None of these questions could be answered at engagement sessions, nor can they be easily answered when reviewing the draft documents.

It is entirely inappropriate to ask the general public to comment on a 3031 page document (and 839 pages for the City of West Torrens extract) that is not written in plain english. With no rationale provided as to why certain areas are being rezoned the

way they are, there is no opportunity for meaningful community participation for such a significant change. This process has failed to comply with the requirements of the Community Engagement Charter and section 44 of the *Planning, Development and Infrastructure Act (2016)*.

Conclusion

In keeping with the principles for 'like for like' zoning, the existing 'Cowandilla / Mile End Character Area 23' should be rezoned to 'Suburban Neighbourhood Zone.' Failure to do so would be a fundamental policy shift, and will see the amenity, character and liveability of this beautiful, historic suburb and its close-knit community destroyed.

Given the significant shortcomings of the current engagement process, it is critical that the community are more meaningfully engaged on these potential changes before implementation.

I trust my concerns will be given due regard in the next stages of this process.

Kind Regards

William