

28 February 2020

Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Via Email: DPTI.PlanningReform@sa.gov.au

Dear Sir/Madam

Re: Submission – Planning and Design Code – Phase 3

MasterPlan provides this submission on behalf of Clayton Wesley Uniting Church, beneficial owners of land at 243 The Parade, Beulah Park and 278 Portrush Road Beulah Park.

On behalf of our clients we respectfully request, as part of the development of the Planning & Design Code (P&D Code) consideration of a review of the proposed zone transition for their land in that the currently proposed zoning does not adequately recognise the land or locality's existing land uses, or ongoing management of this land now and in the future.

The subject land is legally described below:

- 243 The Parade, Beulah Park: Allotment 91, F213405;
- 280 Portrush Rd, Beulah Park: Allotment 91, F213405; and
- 278 Portrush Road Beulah Park:
 - Allotment 3, D39505, Certificate of Title Volume 5208 Folio 379; and
 - Allotment 4, D39505, Certificate of Title Volume 5208 Folio 380.

Allotment 91 contains the Clayton Wesley Uniting Church, ancillary structures, car parking, landscaping and a small cemetery. Allotment 3 and 4 contains a creche (formerly the manse) and storage shed while the remainder is largely vacant with some landscaping and is currently utilised as an unsealed car park. An aerial image of the site is provided below.



Image 1 – aerial image of the site

The locality of the site is characterised by a mix of land uses, including:

- single and double storey dwellings to the north, east and south east;
- single storey commercial buildings further east;
- an approved (yet to be built) 7 storey commercial building to the south on the opposite side of The Parade, which will replace an existing two storey office building; and
- a mix of single and multi-storey commercial/mixed use buildings to the west along The Parade.

As displayed in **Image 2** below, Allotments 3 and 4 currently fall within the Residential Zone, whilst Allotment 91 falls within the Local Business Zone.

The site and surrounding land uses are currently zoned as follows:



Image 2 – current zoning

In review of the PD Code, the land and surrounding land uses will transition to the following zones:



Image 3 – PD Code zoning

As displayed in Image 3, it appears that the intent of the PD Code is to consolidate the zoning of Clayton Wesley's land with the land to the south containing an approved (yet to be built) 7 storey commercial building, to the Suburban Business and Innovation Zone.



In review of the approved documentation associated with the 7-storey commercial building, we contend that this development aligns more closely with the desired outcomes and envisaged forms of development listed in the Urban Corridor (Main Street) Zone.

For reference, Desired Outcome 1 and PO 1.1 of the Urban Corridor (Main Street) Zone states:

A safe, walkable and vibrant shopping, entertainment and commercial main street precinct with an active day and evening economy supported by medium density residential development.

A vibrant mix of land uses adding to the vitality of the area and extend activities outside shop hours including restaurants, educational, community and cultural facilities and visitor and residential accommodation.

We note that the land located along The Parade to the west is to be wholly located in the Urban Corridor (Main Street) Zone. We contend that the Urban Corridor (Main Street) Zone should be extended to Clayton Wesley's land and the recently approved Major Project on the South Eastern Corner of the Portrush Road intersection with The Parade. The wide-ranging use of the Clayton Wesley premises both day and night for community and cultural activities (including the serving of food) matches PO 1.1.

In addition, this approach would ensure a continuous and consistent built form is developed along The Parade, particularly given the approved development on the land to the south represents development clearly more aligned to the nature of development envisaged in the Urban Corridor (Main Street) Zone. This approach will ensure a consistent transition in built form from west to east.

In the circumstance Clayton Wesley's land remains (largely) located in the Suburban Business and Innovation Zone, we request that the P&D Code at least align the Zone boundaries with the northern extent of the subject land consolidating the zoning of all of allotments 3, 4 and 91 into a single zone.

The table below compares the key desired outcome and envisaged forms of development in the Suburban Business and Innovation Zone and the Suburban Neighbourhood Zone which currently represent disparate planning policy across the consolidated site.

The intent of these zones varies significantly. Given that the majority of Clayton Wesley's land will sit within the Suburban Business and Innovation Zone (and potentially developed in accordance with these desired outcomes) it would be practical to consolidate the land's zoning. The PD Code clearly sets out the development intent for Allotment 91, thus it is contended that Clayton Wesley's land in its entirety should be zoned for this purpose.

Accordingly, we submit the whole of the consolidated land parcel should be zoned *Suburban Business and Innovation* in the event that our earlier submission regarding expansion of the Urban Corridor (Main Street) zone are not accepted.

If the zoning is not implemented accordingly, this will continue to create land management inefficiencies, particularly if Clayton Wesley propose to formalise any activities undertaken on allotments 3 and 4.



SUBURBAN BUSINESS AND INNOVATION ZONE	SUBURBAN NEIGHBOURHOOD
<p>DO 1.1 A business and innovation precinct that includes a range of emerging businesses that have low level off-site impacts. Residential development within the area is subordinate to employment uses and generally include medium density residential that is designed to complement, and not prejudice the operation of existing businesses.</p>	<p>DO 1 Low or very low-density housing that is consistent with the existing local context and development pattern. Services and community facilities will contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character.</p>
<p>PO 1.1 Shops, office, consulting room, low-impact industry and other non-residential uses supported by a variety of compact, medium density housing and accommodation types.</p>	<p>PO 1.1 Residential development and supporting uses that provide housing and supporting services and facilities that preserve a low-density residential character.</p>
<p>PO 1.2 Retail, business and commercial development of a scale that provides a local convenience service without undermining the vibrancy and function of zones primarily intended to accommodate such development.</p>	<p>PO 1.2 Dwellings complement the low-density or very-low density character of the neighbourhood.</p>
<p>PO 1.3 Compact, medium density residential development does not prejudice the operation of existing non-residential activity within the zone.</p>	<p>PO 1.3 Shops, consulting rooms and offices of a scale to maintain the amenity of nearby residents.</p>

In the long term, the current P&D Code zoning discontinuity will create difficulties for future development of the land.

In summary, we firstly request consideration that Clayton Wesley's land be zoned Urban Corridor (Main Street) Zone, particularly when viewed in context with its locality and the approved development to the south.

Otherwise, it is our respectful submission that the transition of policy in the P&D Code consolidate the entire Clayton Wesley land zoning within the Suburban Business and Innovation Zone.

Should you require any further details on this submission, please do not hesitate to contact the undersigned by phone on [REDACTED]

Yours sincerely

Greg Vincent
MasterPlan SA Pty Ltd