Dear DPTI

My formal response to the Planning and Design Code is attached.

Please do not publish my email address or any personal information regarding myself.

I would appreciate an opportunity to present this submission to the Planning Commission.

I would also appreciate a copy of the engagement plan prepared for the PDI Code engagement project, as I was unable to find a copy of the plan online.

I can be contacted via this email address should you have any questions or require any clarification regarding this submission.

Regards

Callum Little
SUBMISSION OPPOSING REZONING THE RESIDENTIAL ZONE MEDIUM DENSITY POLICY AREA 12 WITHIN THE CITY OF MARION TO SUBURBAN NEIGHBOURHOOD ZONE

Typical Michell Park Streetscape prior to redevelopment
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1. **Executive Summary**

This submission has been drafted to oppose the rezoning of the Residential Zone Medium Density Policy Area 12 at Mitchell Park within the City of Marion to Suburban Neighbourhood Zone.

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*Key Point 1: The Suburban Neighbourhood Zone is not an appropriate nor equivalent replacement for the Residential Zone Medium Density Policy Area 12*

*Key Point 2: The proposed rezoning will result in a loss of at least $170,000 in land value for a typical allotment.*

*Key Point 3: A more suitable zone is the Urban Renewal Neighbourhood Zone*

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The Planning and Design Code proposes to rezone the Residential Zone Medium Density Policy Area 12 to the Suburban Neighbourhood Zone.

The introduction of the Suburban Neighbourhood Zone will increase minimum allotment size requirements for semi-detached, group, and residential flat buildings by between 17% and 9% and limit maximum building heights from three storeys to two storeys.

The Medium Density Policy Area 12 has been identified by the City of Marion as a location suitable for redevelopment at densities higher than the other policy areas within the City of Marion. The Medium Density Policy Area 12 is an ideal location for redevelopment at higher densities as:

- All dwellings are located between zero and 800 metres from high frequency public transport (‘Go Zones’) or fixed train stations.
- All dwellings are located within one kilometre of a school.
- Dwellings are located within close proximity to Neighbourhood Centre Zones and the proposed Innovation Zone at Tonsley.
- Numerous housing trust dwellings are located within the policy area, generally in poor condition (Appendix A).
- Significant redevelopment has occurred within the policy area with allotment sizes far smaller than those proposed by the Suburban Neighbourhood Zone (Appendix B).

The majority of new development that has occurred within the policy area would not be allowed in the proposed Suburban Neighbourhood Zone.

While this assessment focusses on the one area within the City of Marion, this assessment is likely applicable to many suburbs being re-zoned as part of the planning and design code. Any suburb where minimum allotment sizes are proposed to be increased are likely to be exposed to similar property value losses and impacts.
Overview of existing policy framework within the Marion Council Development Plan

This submission has been limited to the Residential Zone Medium Density Policy Area 12 within the City of Marion Development Plan (consolidated 15 August 2019). This area will hereby be referred to as to ‘Mitchell Park’ and is bound by Alawoona Avenue to the south and Deloraine Avenue to the north (see Figure 1).

Figure 1. Residential Zone Medium Density Policy Area 12 – Mitchell Park
The Residential Zone Medium Density Policy Area 12 is described by the City of Marion Development Plan as:

This policy area encompasses areas especially suitable for a wide range of low and medium-density housing such as detached, semi-detached, row and group dwellings, residential flat buildings, supported accommodation and student and other special purpose housing. Medium density development is especially suited to areas in proximity to centres and public transport, and to areas where such development already occurs (as in the area redeveloped by the former South Australian Housing Trust in Mitchell Park).

The desired character is an attractive residential environment containing low to medium density dwellings of a variety of architectural styles at a higher density and generally a lesser setback from the primary road frontage compared to that typical of the original dwelling stock in the area.

Amalgamation of properties is desirable where it will facilitate appropriately designed medium-density development. Through the gradual redevelopment of properties (particularly those containing lower valued improvements), a wider range of dwelling types will be provided to meet a variety of accommodation needs.

The following forms of development are encouraged within the policy area:

- affordable housing;
- dwelling including a residential flat building; and
- supported accommodation.

The minimum allotment sizes currently permissible within the policy area are as follows:

<table>
<thead>
<tr>
<th>Dwelling Type</th>
<th>Minimum Site Area (square metres)</th>
<th>Minimum Frontage Width Other Road (metres)</th>
<th>Minimum Frontage Width Arterial Road (metres)</th>
<th>Minimum Site Depth (metres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detached</td>
<td>300</td>
<td>10</td>
<td>12</td>
<td>20</td>
</tr>
<tr>
<td>Semi-detached</td>
<td>270</td>
<td>9</td>
<td>12</td>
<td>20</td>
</tr>
<tr>
<td>Group</td>
<td>250</td>
<td>18</td>
<td>18</td>
<td>45</td>
</tr>
<tr>
<td>Residential flat building</td>
<td>250</td>
<td>18</td>
<td>18</td>
<td>45</td>
</tr>
<tr>
<td>Row</td>
<td>210</td>
<td>7</td>
<td>12</td>
<td>20</td>
</tr>
</tbody>
</table>

Source: City of Marion Development Plan, p. 242

In addition, medium density development should be in the form of two storey buildings with an ability to provide a third storey addition within the roof space.
Impact of the Suburban Neighbourhood Zone on Mitchell Park

The Suburban Neighbourhood Zone proposes the following changes to minimum allotment sizes:

Minimum frontage for a detached dwelling is nine metres; semi-detached dwelling is nine metres; row dwelling is seven metres; group dwelling is 15 metres; residential flat building is 15 metres.

Minimum lot size for a detached dwelling is 300 square metres; semi-detached dwelling is 300 square metres; row dwelling is 200 square meters; group dwelling is 300 square meters; residential flat building is 300 square metres.

The proposed policy framework would require an allotment with the following dimensions in order to be subdivided from one to three allotments.

- 27 metre frontage and 900 square metres for three detached dwellings;
- 27 metre frontage and 900 square metres for one detached dwelling and two semi-detached dwellings;
- 21 metre frontage and 600 square metres for three row dwellings; or
- 15 metre frontage and 900 square metres for three dwellings in the form of a residential flat building.

Typical allotment dimensions in Mitchell Park are 18 metre frontage and 820 square metre allotment area.

The proposed policy framework would mean that the majority of infill development which has already occurred within the area would be prohibited.

Infill development within Mitchell park has significantly improved the amenity of this suburb and has had the following benefits:

- **Less pressure on Council to raise rates through a larger rates base** - (more rateable properties means that councils is able to meet their budget requirements without significant rate increases.
- **Less pressure to redevelop agricultural land and land on the fringe of Adelaide** - Through the provision of new dwellings close to employment and services.
- **Increased public transport use** - As a result of more people living near public transport.
- **Improved streetscapes** - As a result of the construction of new high-quality dwellings (Appendix B).
- **Lower energy bills for residents** - All new dwellings must comply with a six-star energy rating, compared to existing weatherboard and asbestos housing which are generally poorly insulated and energy inefficient.
- **More vibrant streetscapes** - Through the introduction of families and first home owners to the community.
- **More housing choice** - Infill development allows residents to live in more compact dwellings which may be better suited to single person households, older people and people with a disability.
- **More affordable housing** - Smaller allotments reduce the cost of land for new development.
- **Opportunities to age in place** - Older people can downsize without leaving the area.
- **Improved landscaping and greener streets** - All new dwellings are required to plant landscaping. In particular group dwellings and residential flat buildings must landscape driveways and common areas.
- **Maximising existing infrastructure** - Such as schools, reserves and playgrounds.
- **Reducing anti-social behaviour Graffiti and Vandalism** - Redeveloped dwellings are generally located closer to the street and are required to include at least one living area that overlooks the public realm. Existing dwellings are generally setback from the street and screened by high fences (Appendix A)

Therefore, the Suburban Neighbourhood Zone would not be an appropriate replacement for the Residential Zone Medium Density Policy Area 12.

Figures 2, 3, 4 and 4b show examples of development that would prohibited within the Suburban Neighbourhood Zone.

**Key Point 1: The Suburban Neighbourhood Zone is not an appropriate nor equivalent replacement for the Residential Zone Medium Density Policy Area 12.**

**Figure 2. Existing redevelopment in Mitchell Park compared to a typical allotment**
Figure 3. Existing development adjacent to Ascot Park Train Station that would be prohibited as a result of the Suburban Neighbourhood Zone.
Figure 4a and 4b. Redevelopment north of Thirza Avenue that would be prohibited as a result of the Suburban Neighbourhood Zone

Figure 4b. Redeveloped sites that would be prohibited by the Suburban Neighbourhood Zone
4. **Financial Impact**

Implementation of the Suburban Neighbourhood Zone will have a devastating impact on property owners within the Suburban Neighbourhood Zone. A **typical allotment can expect to lose $170,000 in value as a result of the rezoning.**

**Example - Owner of typical allotment with a current land value of $400,000**

![Diagram showing a typical allotment with a current land value of $400,000.]

*Current scenario - subdivision under the Residential Zone Medium Density Policy Area 12. Approximate total subdivided value - $670,000.*
Proposed scenario - subdivision under the Suburban Neighbourhood Zone. Approximate total subdivided value - $540,000.

A comparison of the two scenarios show that under the proposed Suburban Neighbourhood Zone, land value for a typical allotment would be $170,000 less than under the current zoning system. The above scenario represents a minimum loss of $170,000 per allotment. The above figures are based on land values only.

**Key Point 2: The proposed rezoning will result in a loss of $170,000 in land value for a typical allotment.**

Experience and anecdotal evidence indicate that there is little or no financial incentive to divide an allotment from one into two. This would mean that all redevelopment activity within the policy area would effectively cease with poor quality dwellings (Appendix A) remaining within the policy area and preventing urban regeneration.
5. **Assessment of the proposed re-zoning against the South Australian State Planning Policies**

The State Planning Policies set out a framework for land use in South Australia. The policies represent the highest level of policy in the South Australian Planning System. The Planning and Design Code should respond to and be consistent with the State Planning Policies.

*The South Australian State Planning Policies encourage infill development and higher densities within areas well served by public transport, schools and employment zones.*

Reducing densities under the proposed Suburban Neighbourhood Zone in Mitchell Park is inconsistent with the principles under the South Australian State Planning Policies.

The following section outlines the application of the various State Planning Policies to the Residential Zone Medium Density Policy Area 12.

**STATE PLANNING POLICY 1: INTEGRATED PLANNING**

Objective - To apply the principles of integrated planning to shape cities and regions in a way that enhances our liveability, economic prosperity and sustainable future.

Relevant policies:

1.1 *An adequate supply of land (well serviced by infrastructure) is available that can accommodate housing and employment growth over the relevant forecast period.*

1.2 *Provide an orderly sequence of land development that enables the cost-effective and timely delivery of infrastructure investment commensurate with the rate of future population growth.*

1.3 *Plan growth in areas of the state that is connected to and integrated with, existing and proposed public transport routes, infrastructure, services and employment lands.*

1.7 *Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations supported by infrastructure, services and facilities.*

State Planning Policy 1 encourages suburb regeneration and housing growth in areas:
- that are well serviced;
- served by public transport;
- where infrastructure is already available;
- that are cost effective; and
- is located in close proximity to employment lands

The Mitchell Park area meets all of the above criteria and is suitable for redevelopment at higher densities. Significantly limiting the development opportunities under the proposed Suburban Neighbourhood Zone in Mitchell Park is entirely inconsistent with State Planning Policy 1.
STATE PLANNING POLICY 3: ADAPTIVE REUSE

Objective - The adaptive reuse of existing buildings that enhance areas of cultural or heritage value, capitalise on existing investment and/or contribute to vibrant and liveable places.

Relevant policies:

3.1 Remove barriers and encourage innovative and adaptive reuse of underutilised buildings and places to inspire urban regeneration, stimulate our economy and unlock latent investment opportunities.

3.2 Sponsor models of adaptive reuse that allow flexible access to public spaces and infrastructure.

Undeveloped land within Mitchell Park is significantly underutilised. Redevelopment at higher densities represents a significant improvement to streetscapes, public safety and the health of residents (Appendix B). It also allows for urban regeneration, leading more vibrant and liveable communities and places.

Preventing redevelopment and urban regeneration is inconsistent with State Planning Policy 3.

STATE PLANNING POLICY 5: CLIMATE CHANGE

Objective – Provide for development that is climate ready so that our economy, communities and environment will be resilient to climate change impacts.

Relevant policy:

5.1 Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.

Increasing minimum allotment sizes as proposed will not result in a more compact urban form. The redevelopment of low value, low density dwellings in an area close to public transport and employment opportunities is positive. Infill development within well serviced areas limits pressure for urban sprawl. Mitchell Park is well served by shops, public transport and schools. The primary impediment to redevelopment of the area is restrictive planning policies.
STATE PLANNING POLICY 6: HOUSING SUPPLY AND DIVERSITY

Objective – To promote the development of a well-serviced and sustainable housing and land choices where and when required.

Relevant policies:

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.

6.2 The timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.

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.

6.6 A diverse range of housing types within residential areas that provide choice for different household types, life stages and lifestyle choices.

6.7 Facilitate the provision of Affordable Housing through incentives such as planning policy bonuses or concessions (e.g. where major re-zonings are undertaken that increase development opportunities).

6.8 Ensure a minimum of 15% of new housing in all significant developments that meets the criteria for affordable housing.

6.9 Apply universal and adaptable housing principles in new housing stock to support changing needs over a lifetime, including the needs of those who are less mobile.

6.12 Regional Plans should include performance targets about increasing housing diversity.

6.13 Regional Plans should include performance targets related to land supply and demand.

The introduction of the Suburban Neighbourhood Zone will inhibit any opportunities for redevelopment within Mitchell Park. Suburban Neighbourhood Zone policies seek to homogenize development within the area by only permitting one allotment size, making poor use of the proximity to fixed train lines and high frequency bus routes.

Lower densities close to bus routes and train stations significantly discourage public transport. Higher densities should be encouraged in close proximity to train stations and ‘Go Zones’, which would not be achieved under the Suburban Neighbourhood Zone. The proposed policies would significantly deter the diversity redevelopments that has already occurred in Mitchell Park.

The existing redevelopments and housing diversity in Mitchell Park have dramatically improved streetscape amenity and the quality of life of residents. The proposed rezoning will eliminate further opportunities for such improvements and is therefore contradictory to State Planning Policy 6.
STATE PLANNING POLICY 9: EMPLOYMENT LANDS

Objective – To provide sufficient land supply for employment generating uses that supports economic growth and activity.

Relevant policies:

9.2 Enable opportunities for employment and encourage development of underutilised lands connected to, and integrated with, housing, infrastructure, transport and essential services.

The Tonsley Innovation precinct offers opportunities for employment, learning and training within a well-connected location. Mitchell Park is located one train stop from the Tonsley innovation precinct. Higher densities in Mitchell Park supports existing centre zones and employment zones.

STATE PLANNING POLICY 11: STRATEGIC TRANSPORT INFRASTRUCTURE

Objective – To integrate land use policies with existing and future transport infrastructure, services and functions to preserve and enhance safe, efficient and reliable connectivity for people and business.

Relevant policies:

11.2 Development that maximises the use of current and planned investment in transport infrastructure, corridors, nodes and services.

11.11 Encourage housing in metropolitan Adelaide in proximity to current and proposed fixed line (rail, tram, O-Bahn and high frequency bus routes).

Figure 6 below shows an 800-metre walking distance from train stations within Mitchell Park and 400 metres from Go Zones. Figure 6 clearly demonstrates that all of Mitchell Park is located in close proximity to high frequency safe and reliable public transport.

Reducing redevelopment opportunities in close proximity to train stations and Go Zones is inconsistent with State Planning Policy 11.
Figure 5 Walking Distances from Train Stations and Go Zones
6. **Assessment against the 30 Year Plan for Greater Adelaide 2017 Update**

The introduction of the Suburban Neighborhood Zone into Mitchell Park is inconsistent with the 30 Year Plan for Greater Adelaide 2017 Update. The 30 Year Plan encourages increased residential densities within walkable neighborhoods and where dwellings are located in close proximity to employment and services. Mitchell Park meets every criterion to be defined as a walkable neighborhood. The following is an assessment of 30 Year Plan for Greater Adelaide Targets against the introduction of the Suburban Neighborhood Zone in Mitchell Park:

**TARGET 1 CONTAINING OUR URBAN FOOTPRINT AND PROTECTING OUR RESOURCES**

1.1 - *85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045*

1.2 - *90% of all new housing in the Outer Greater Adelaide will be built in established townships and designated urban development areas by 2045*

The introduction of the Suburban Neighbourhood Zone will eliminate any incentive to subdivide within Mitchell Park. The introduction of the Suburban Neighbourhood Zone limits opportunities for infill development and is inconsistent with the 30 Year Plan Target 1.

**TARGET 2 MORE WAYS TO GET AROUND**

*60% of all new housing in metropolitan Adelaide is built within close proximity to current and proposed fixed line (rail/tram/O-Bahn) and high frequency bus routes by 2045*

*Therefore to grow public transport use in Adelaide, increases in dwelling density are required within:*

*• 800 metres of tram route* corridor catchments

*• 800 metres of train stations and O-Bahn interchanges* *

*• 400 metres of high frequency bus routes (including Go Zones)*

The entirety of Mitchell Park meets the above criteria. The introduction of the Suburban Neighbourhood Zone will severely limit opportunities for infill development. Dwelling densities within Mitchell Park should be increased rather than decreased.

Re-zoning Mitchell Park to Suburban Neighbourhood Zone is inconsistent with 30 Year Plan Target 2 and will not increase development within the catchments defined in figure 6 below.
Figure 6 Map 15 from the 30 Year Plan for Greater Adelaide showing public transport catchments and areas suitable for increased densities and infill development

Map 15 — Current and proposed fixed line and high frequency bus routes
TARGET 3 GETTING ACTIVE

Increase the share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide by 30% by 2045

Increasing residential densities in close proximity to employment land and innovation precincts supports 30 Year Plan Target 3. Limiting residential densities in Mitchell Park is inconsistent with Target 3 of the 30 Year Plan.

TARGET 4 WALKABLE NEIGHBOURHOODS

Increase the percentage of residents living in walkable neighbourhoods in Inner, Middle and Outer Metropolitan** Adelaide by 25% by 2045

This target will incorporate the following criteria:

1. Public open space* (greater than 4000m2 in size) (400m / 5 min walk)
2. Primary schools (1km / 15 mins walk)
3. Frequent bus services (including Go Zones) (400m / 5 min walk) OR Train station or tram/o-Bahn stop (800m / 10 mins walk)
4. Shops (800m / 10 mins walk)

The entirety of Mitchell Park is a ‘Walkable Neighbourhood’. Target 4 of the 30 Year Plan seeks 90% of residents to live within Walkable Neighbourhoods by 2025. There is no reason to limit infill development within a ‘walkable neighbourhood’.

Residential densities should be increased in Mitchell Park not decreased. The introduction of the Suburban Neighbourhood Zone will limit opportunities to live in a walkable neighbourhood and is inconsistent with Target 4.

TARGET 6 GREATER HOUSING CHOICE

Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045

The introduction of the Suburban Neighbourhood Zone will result in a minimum allotment size of 300 square metres for all development within Mitchell Park. These policies are completely at odds with Target 6 which encourages housing diversity and affordable housing.

As there will be no incentive to divide land and the only type of development permissible within Mitchell Park will be detached dwellings there will be no longer be any opportunity for housing diversity within the suburb, or incentive to provide affordable housing.

Re-zoning Mitchell Park to the Suburban Neighborhood Zone discourages housing diversity and affordable housing and is inconsistent with Target 6.
7. **Alternative Zone Policies Urban Renewal Neighbourhood**

A more suitable Zone for Mitchell Park is the Urban Renewal Neighbourhood Zone. The Urban Renewal Neighbourhood Zone more closely reflects existing planning policies within Mitchell Park and will enable infill development to continue. The Desired Outcome of the Urban Renewal Neighbourhood Zone states:

> Housing that no longer meets community preferences is replaced with new diverse low – medium rise housing options. Housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity.

The desired outcome of the Urban Renewal Neighbourhood Zone more closely reflects the desired character of the Residential Zone Medium Density Policy Area 12 than the Suburban Neighbourhood Zone.

Urban Renewal Neighbourhood Zone DTS 2 states that:

> Residential development comprises:
>  
>  (a) detached dwellings;
>  (b) semi-detached dwellings;
>  (c) row dwellings;
>  (d) group dwellings;
>  (e) residential flat buildings;
>  (f) retirement facility; or
>  (g) Supported accommodation.

The above types of dwellings closely reflect the existing character of Mitchell Park, in particular infill development that has occurred within the area. The above forms of development are also supported by existing zone policies within Mitchell Park. The Suburban Neighbourhood Zone prohibits the above types of development though restrictive minimum allotment sizes and limited policy support.

DTS 2.1 states that:

> Building height (excluding garages, carports and outbuildings) not exceeding:
>  
>  (a) 4 building levels and 15m where the site:
>     i. is at least 1200m²
>     ii. has a frontage of at least 35m
>  (b) 3 building levels and 12m in all other circumstances.

The existing Residential Zone Medium Density Policy Area allows building heights of up to 3 storeys. DTS 2.1 above from the Urban Renewal Neighbourhood Zone allows buildings up to 4 storeys high. This form of development will not be typical as the majority of allotments within the policy area are 800 square metres or less. Building heights could also be restricted to 3 storeys by a local policy addition (this is however not necessary).

The form of development encouraged in the Urban Renewal Neighbourhood Zone is entirely consistent with the existing character and existing planning policies within Mitchell Park.

Re-Zoning Mitchell Park to Urban Renewal Neighbourhood Zone is consistent with both the State Planning Policies and 30 Year Plan for Greater Adelaide 2017 Update Targets, policies and objectives.

Mitchell Park should be rezoned to Urban Renewal Neighbourhood Zone.
8. **Conclusion**

The proposed re-zoning is inconsistent with the existing planning policy framework within Mitchell Park and will result in a negative financial impact of up to $190,000 for a typical land owner. The proposed re-zoning is inconsistent with the State Planning Policies, and 30 Year Plan for Greater Adelaide 2017 update. These fundamental strategic plans encourage higher densities within well serviced areas as described in detail above.

The Urban Renewal Neighbourhood Zone more closely matches existing planning polices within Mitchell Park. Re-zoning Mitchell Park to Urban Renewal Neighbourhood Zone achieves the objectives of both the State Planning Policies, and 30 Year Plan for Greater Adelaide 2017.

I would appreciate any opportunity to present this submission to the Planning Commission, DPTI Staff or any decision maker. I would be pleased to elaborate on any of the above points should I be given the opportunity.

Yours faithfully

Callum Little

_BA Legal Studies, Grad Dip Urban and Regional Planning_  
_Master Urban and Regional Planning_  
_Diploma of Project Management_
Appendix A Examples of existing dwelling typology
Appendix B Examples of infill development that would be prohibited in the Suburban Neighbourhood Zone