

Critical date: before 5pm Friday 28 February 2020

By email: DPTI.PlanningReformSubmissions@sa.gov.au

In response to the draft Planning and Design Code – phase 3, I wish to register my strong objections in relation to the issues outlined below.

- I, Kevin Baker, currently live at [REDACTED] Mile End, within West Torrens Residential Zone, specifically Cowandilla/Mile End Character Area 23.
- The most similar ‘like for like’ zone in the planning reforms is the ‘Suburban Neighbourhood Zone’, with character overlay.
- However, as part of the planning reforms, it is proposed that parts of Mile End, Torrensville, Cowandilla and Hilton, where I live, be rezoned as ‘Housing Diversity Neighbourhood Zone’. There is no rationale for this proposal as it is not consistent with my neighbouring suburbs with similar history, heritage and character, nor is it ‘like for like’ with what we have now.
- The intent of the current zone is that blocks will be low to very low density. This is inconsistent with the objectives of the ‘Housing Diversity Neighbourhood Zone’, which states that this area may apply to existing medium density policy areas.
- The current zone clearly states that the area will predominately comprise detached and semi-detached dwellings. This is fundamentally inconsistent with the objectives of the ‘Housing Diversity Neighbourhood Zone’, which provides replacing existing dwellings with medium density housing, primarily in the form of terrace housing, group dwellings or residential flat buildings.
- The 1996 Heritage Review contains an overview of some of the rich history that provides the foundation for our suburb. This will be lost if you do not give appropriate regard to the more appropriate zone as a part of the planning reforms.
- **My area should be transitioned to ‘Suburban Neighbourhood Zone’, in keeping with the rest of the suburb.**
All other Character Policy Areas other than this area are proposed to transition to the Suburban Neighbourhood Zone.
- Siting and Setbacks: Under the Code, building setbacks from side and rear boundaries will noticeably decrease, particularly at upper levels. This is unacceptable and will severely impact amenity and privacy. Existing siting, setback and floor area criteria should be maintained throughout all residential areas.
- Density and Allotment Sizes: The draft Code contains a number of errors and omissions. It is important that current minimum allotment sizes, heights and frontage widths match existing.
- The draft code is complex and difficult for lay people to navigate.
- The materials produced in support of the draft code are not produced in plain English, there has been no provision of information that provides a clear rationale for why this area is being treated the way it is. Therefore, there has been no opportunity for meaningful community participation for such a significant change. The reasons for the proposed change to move to a zone that is not ‘like for like’ have been absent, contradictory or non-existent.

- As such, the requirements in the Community Engagement Charter and section 44 of the *Planning, Development and Infrastructure Act 2016 (SA)* have clearly not been complied with.
- I am extremely concerned that if the proposed changes proceed for my area as a 'Housing Diversity Neighbourhood Zone', the amenity and character of this unique, historic suburb and its close community will be destroyed.
- This is an inner character suburb, which is still relatively affordable. This is evident in the mix of people who live here. It is unwise to destroy a suburb like ours, the likes of which no longer exist in larger cities such as Melbourne.
- Commercial Centres
- The Code places large scale centres in the same zone as small local shops, allowing large scale development and more intensive land uses throughout all these areas. This is inappropriate. A hierarchy of centres should be maintained. Additional zone(s) are needed to cater for the lower intensity local centres, particularly in older established areas.
- Public Notification
- The Code should include notification for all development that increases development intensity, including additional dwellings on the site, two-storey development, earthworks where new dwelling is located 600mm above ground level, and change of use from residential to non-residential.
- Impact on Infrastructure and Essential Services
- The potential rate and intensity of new development which will be facilitated through the proposed Code policies, could place existing local infrastructure, especially roads and stormwater systems, under stress, particularly in our older established areas.

Corridor Creep

- Under the proposed planning changes, the Urban Corridor Zone – High Street Policy Area 35 (being the zone along Henley Beach Road between South Road and Marion Road) will be proposed to be an "Urban Corridor Main Street" Zone.
- There is important background context that must be considered as a part of the reforms for this area.
- At the time that the Urban Corridor Zone was introduced for the City of West Torrens, all of the collateral that was being used for consultation with the community expressly implied that the development changes being proposed was for **along** the corridor itself (being Henley Beach Road), meaning that it must have corridor frontage and that what was being proposed was changes for development along the corridor.
- Parts of the current zone are limited to Henley Beach Road Frontage (all of the Eastern Side of South Road, but the majority of the Southern side of South Road extending through to streets such as Norma Street and Rankine Road which are largely residential from the western end of Falcon Ave.
- Since the changes to the Urban Corridor Zone has been introduced, it is clear that what was being consulted on in 2013 and 2015 was misleading, as developments have been proposed that are not along the corridor itself. This is causing significant

angst for the community and lots of people are now considering selling and moving out of fear about what the suburb is going to become ('Zone Creep').

- There are two options need to be included in the changes as a part of the "Urban Corridor Main Street" Zone, namely:
 - ensure that the developments within the corridor zone must have corridor frontage, rather than simply be along the suburban back streets with no contact along the corridor; and
 - revise the boundary for the new Zone for the areas of the current corridor zone are residential, meaning west of Falcoln Avenue along Norma Avenue should be treated as Suburban Neighbourhood Zone (photo of the streetscape along this street below).
Attachment 1 shows the current corridor and the red line shows an example of where the zone needs to be changed to ensure the zone remains along the urban corridor and the current streetscape.

- If what is requested above is not able to be considered as a part of the planning changes to fix the 'Zone Creep', it is requested that further consultation occur with the community on what the impact would be if the zone west of South Road along Henley Beach Road be zoned as 'Urban Corridor Living' Zone.

Attachment 1 – example of urban corridor that needs to be addressed – West of south road should be consistent with Henley Beach road east of South Road. Rankine Road – Urban Corridor creeps too far into Rankine Road. These developments have lead people to sell their homes due to anxiety. Norma Street facing west– the houses to the right are within the Urban Corridor.

