

28/2/20

Department for Planning, Transport and Infrastructure

Sent via email:

DPTI.PlanningReformSubmissions@sa.gov.au

Attn: Planning Reforms Section

Re: Planning Reform Submission on the proposed Planning and Design Code Stage 3

I have recently entered into agreement with Renewal SA to purchase a piece of land of over 3600 square metres (m²) of surplus school land from the Seaview Downs Primary School, in order to develop for residential purposes. Refer attached Plan of Division and aerial image below:



The land is currently Zoned as Residential Zone, Hills Policy Area and there are significant limitations on the development opportunity of the site, with site area minima of not less than 700 square metres (m²) per dwelling and that being a sliding scale upwards dependent on the site gradient average overall.

The subject land, much larger than any nearby land within the same Zone for residential purposes, is constrained by the same parameters that apply to any smaller parcel that might be abutted on one or several sides by other dwellings and potentially have fall away from the street. This site has fall to the street and only has direct abutment to two residential properties to the south and adequate provision for separation can be made with future allotment boundary alignments and design.

This land offers the potential for a more compact form of division and development without the degree of challenges presented by smaller type allotments in the general area (but large enough to divide in a piecemeal 'one into two' manner), which are often undulating and faced with issues of cut, fill, retaining walls, difficult drainage arrangements, interface with adjacent residential properties and how to manage the various conflicts that arise, such as overlooking, visual impact and overshadowing.

In principle, I am supportive of this land being transitioned to the **General Neighbourhood Zone**, as proposed, with a minimum allotment size of 300m² for detached dwellings and opportunity for a more diverse range of housing than what the current Zoning offers.

However, I have become aware of a push back from Marion Council regarding the proposed changes to parts of the current Hills Policy Area and other areas where there is more undulation, and I understand that similar concerns have been aired by other Councils with General Neighbourhood Zoning being earmarked for areas with escarpments and undulation.

I respect that there are potential issues with less orderly forms of division of smaller allotments in such areas but if the Department is of the mind, in responding to concerns raised by City of Marion, to change the areas currently located in the Hills Policy Area of the City of Marion to "Suburban Neighbourhood" (for instance) and bring across the current site area and frontage minima, that will represent a significant opportunity lost for redevelopment of quite substantial pockets of post-war housing that is ripe for renewal, in what is a middle ring suburb reasonably close to facilities and transport to warrant greater consolidation.

At the very least, the entire land currently occupied by the Seaview Downs Primary School should remain in the General Neighbourhood Zone as earmarked, to ensure that such a large site, or part thereof, can be developed at a more compact and orderly level, without the constraints of the current site area and frontage minima.

I would also suggest keeping the allotments that abut the school grounds on the northern side of Kanangra Rd within the General Neighbourhood (GN) Zone, which are all north-south aligned with north to the rear, have fall to the street and have wide frontages, each being in the order of 600m² or greater, making them appropriate for infill development under the GN Zone provisions.

Thanks in advance for consideration my submission in the refining of the Planning and Design Code post consultation.

Should you wish to discuss, please contact me on [REDACTED]

Yours sincerely,

Pierre Ducaj