26 February, 2020

State Planning Commission
By email: DPTI.PlanningReformSubmissions@sa.gov.au

To whom it may concern,

I wish to register my strongest objections to the draft Planning and Design Code – phase three.

I have been a resident of Torrensville in the West Torrens City Council (WTCC) area for the past 10 years - currently at [Address], previously at [Address] just a block away.

My area, loosely bound by South Road, Henley Beach Road, Marion Road and Sir Donald Bradman Drive, is entirely residential in nature and classed by WTCC as “low to very low density”.

Comprising a range of homes ranging from Victorian and pre-Federation era to early 20th century, interspersed with some more recent builds, it is currently classed by WTCC as a “character residential zone”.

For some reason, the proposed new code reclassifies this area as a “Housing Diversity Neighbourhood Zone”, despite surrounding areas in the same suburb being reclassified under the more appropriate “Suburban Neighbourhood” zone. (See map on page 3.)

I strongly believe the WTCC Character Policy Area 23: Residential Zone - Cowandilla / Mile End West should be classified as “Suburban Neighbourhood” for the following reasons:

Inconsistency

• All other Character Policy Areas have transitioned to the Suburban Neighbourhood Zone except for Area 23 – this is completely illogical and inconsistent.

• The Suburban Neighbourhood Zone is the most similar “like for like” in the draft planning code with the current neighbourhood classification, and is consistent with the rest of Mile End, Torrensville and Thebarton.

• The current Development Plan states a low to very low density of housing in Area 23. This is inconsistent with the objectives of the Housing Diversity Neighbourhood Zone, which states that “housing diversity” may apply to existing medium density policy areas.

Amenity

• The Housing Diversity Neighbourhood Zone aims to increase housing density to “up to 70 dwellings per hectare”, which represents a more than doubling of the current number of dwellings in Area 23. This is of significant concern as parking and street access are already a growing problem in the area.

• Such an increase in density can only be achieved by demolishing existing single dwellings to construct multi dwelling developments, ie: battleaxe allotments, units or apartment blocks. Current WTCC planning laws for Area 23 dictate that all new developments must be of a “similar size and scale” to surrounding dwellings (most of which are low rise/single storey) and must not “detract” from the character of the neighbourhood. This is
fundamentally inconsistent with the objectives of the Housing Diversity Neighbourhood Zone, which encourages replacing existing dwellings with medium density housing, primarily in the form of terrace housing, group dwellings or residential flat buildings. Again this is of significant concern - the prospect of one-to-four person households gradually being replaced by apartment blocks, with heritage and character dwellings put at risk of being demolished or dwarfed by looming developments is one that will totally change the face and character of the neighbourhood.

- Non-residential uses are inappropriate for our residential streets – we are surrounded by main roads, three of which are mostly non-residential. Expanding non-residential developments further into side streets would create an unpleasant place in which to live, not to mention it would be an odd “island” of mixed use when all surrounding areas are purely residential.

- More historic buildings will likely be lost if proper regard is not given to zoning Area 23 more appropriately as a part of the planning reforms.

This week I corresponded with three separate WTCC councillors, including Deputy Mayor John Woodward, and a WTCC staff member about the proposed rezoning of Area 23, and all were of the opinion that the reclassification was illogical, an “anomaly” in the area given the surrounding zones, and “an error” on the part of DPTI.

I sincerely hope that DPTI rectifies this grave error, and rezones Area 23 to be consistent with neighbouring Suburban Neighbourhood zones.

My husband and I have chosen to stay in this exact same part of Torrensville for so long simply because we love it here - the houses have character, the streets have nice amenity, there is a good amount of green space, and a great mix of people and cultures. We also enjoy living within a short walk to the commercial areas of Henley Beach Road, with its shops, cafes and restaurants.

We are both extremely concerned that these proposed new planning laws have little regard for retaining or protecting the character, amenity and heritage of our beautiful western suburbs, and will have a seriously detrimental effect on the area.

Adelaide markets itself internationally as a vibrant, modern city with a strong sense of heritage, surrounded by parklands and bursting with open, green space. But so much of that wonderful heritage and open space has been lost to developers over the decades due to complacency. If we are to retain our international reputation as one of the world's most livable cities we must protect it at its foundations, and that means protecting the character and amenity of our neighbourhoods.

Yours faithfully,

Petra Starke

[Address]

[Phone]

[Email]
Character Policy Area 23: Residential Zone - Cowandilla / Mile End West – outlined in blue – is proposed for reclassification as “Housing Diversity Neighbourhood”, unlike surrounding suburbs which have been classified “Suburban Neighbourhood” (darker pink).