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02 MAR 2020

Jim Allender

Unley, S.A. 5061

State Planning Commission
Level 5, 50 Flinders Street
Adelaide SA 5000
Atten Michael Lennon or a designated planner.

Unley City Council
Attention: David Brown or a designated planning officer.

I have the life interest in CT 4292/428 ([REDACTED] Unley), which I believe has been enclosed within an Historic Area (**HAS**) by the State Planner and one that is purely *residential*, (I would like confirmation of this).

It is a complex matter to assess the Previous Code, the new code and the Unley Council's appraisal of the latter which was only submitted in mid-February 2020 with *little time to compare and evaluate so that an extension to respond should be mandatory*.

About Local Heritage Places and Historic Area Overlays the Council says in its submission that there has been a 'transition of existing heritage places and Historic Conservation and Streetscape Zones into the new Local Heritage Places and Historic Area Overlays', furthermore, they say 'is positive and welcomed by the Council'. *But I need to understand just what was prior that HAS overlays are now replacing and what subtractions, changes or additions have been made to arrive at the HAS overlay?*

The Council submission says that 'The associated Historic Area Statements (HAS) issued on 23 December 2019 are a recognition of the distinct and important historical characteristics of individual areas. The statements are integral to the identification of contributory buildings and development for protection, conservation and improvement, and nature of new development, that will maintain the intrinsic values of these areas.'

I also note that under also 'heritage matters' the Council states:

- The broad application of the Historic Area Overlay is positive (but I need the facts requested above to check on this).
- Historic Area Statements require the critical Building siting criteria. (which I would like a copy of please).
- Historic Area Overlay policy on demolition and improvements be improved. (Could you please tell me more of the policy and how this relates to HAS).
- The Minister for planning supports the application for further Historic Areas and the local determination of development applications. (But I note that that the Council also say "the current requirement for 51% of all landowners in an area to provide any approval to a new historic area is contrary to a normal and broader public interest, community benefit and proper objective analysis. The removal of this requirement facilitates better public policy and community determination and should be a key element of the review. (I take this to mean that the 51% entirely weakens the concept of historicity which should be a matter of fact rather than subjectivity. Please let me know if this interpretation is what is correct.

You will note that the block CT 4292/428 ([REDACTED] Unley), backs onto Irwin Lane and that an Urban Corridor lies beyond along Unley Rd.

In respect of the Urban Corridor, two sections out of Council's submission are strongly supported by me. It is quite clear that Unley Road cannot sustain high rise and high-density development.

The suggestions below must be an upper limit. The arguments against these high-rise injections are readily available and can be found locally, nationally and internationally. There is little support for high-density development apart from short term temporary financial gain.

About this urban corridor the Council says:

Design in Urban Areas

- Policy should apply from three-storey, not designated four-storey, per proposed medium rise and existing policy threshold, e.g. Building Interface Envelope (30 degrees)
- Positive sustainability improvements to be applied more consistently
- Private Open Space provision should be maintained and applied equally
- Privacy (Overlooking) should remain at 1.7m and not reduced
- Vehicle spaces, enclosures and manoeuvrability be improved
- Vehicle garage/carport widths should be a maximum of 30% of site frontage;

In the same vein, I would also support the council's request for a 30-degree plane grading East from Irwin Lane, and I don't see why our pre-existing views of the sunrise, and moonrise and cloudscape and trees and hills etc., should be blocked out more than the two storeys (as is seemingly allowed on either side of us in our HAS zone).

On the above matter, I would like to receive an immediate notification of any plans submitted for the development of the urban corridor behind me and for three blocks on either side of that.

Also, I strongly support the efforts of the Unley Council regarding the maintenance of tree canopy preservation and maintenance. I do have trees on my property that may be deemed significant.

A handwritten signature in black ink that reads "James Allender". The signature is written in a cursive style with a long, sweeping underline.

Jim Allender
Geophysicist

cc. Michael Hewitson