State Planning Commission

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

To whom it may concern,

SUBMISSION ON PLANNING AND DESIGN CODE.

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

1. Housing Diversity Objections

At present, my house at 41 Norma Street Mile End is within West Torrens Residential Zone, specifically Cowandilla/Mile End Character Area 23. My area, loosely bound by South Road, Henley Beach Road, Marion Road and Sir Donald Bradman Drive is currently entirely residential in nature, low density, with a range of late 19th century to early 20th century homes, interspersed with some more recent infill. I have lived here since 1984.

For some reason, Planning SA at this consultation phase has proposed that the above section of Mile End be rezoned as ‘Housing Diversity Neighbourhood Zone’ (see figure 4 page 4).

- However, the most similar ‘like for like’ (character/suburban) in the planning reforms is the Suburban Neighbourhood Zone which is also consistent with the rest of Mile End, Torrensville and Thebarton zones of Suburban Neighbourhood.
- It is unclear why the draft proposes that Residential Zone, Policy Area 23, be changed to Housing Diversity Zone when all other Character Policy Areas have transitioned to the Suburban Neighbourhood Zone.
- The density proposed in the Housing Diversity Zone is incongruent with what is currently within the Development Plan. The intent of Character Policy 23 is that blocks are low-very low density. 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.
- Non-residential uses are entirely inappropriate for our residential streets – we are surrounded by main roads, three of which are mostly non-residential. Expanding non-residential developments further into the side streets would create an unpleasant place in which to live.
- 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 encourages 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 proper regard to the more appropriate zone as a part of the planning reforms.

This section of Mile End must be transitioned to Suburban Neighbourhood Zone, as recommended by the City of West Torrens’ submission, and in keeping with the rest of the suburb. In addition, I have spoken with the senior planners at the City of West Torrens who also oppose these changes, as do our council and Mayor. People who are familiar with this area – one of the oldest in Adelaide, recognise its value and believe it must not be rezoned as Housing Diversity.

Lack of Rationale for proposed code changes and flawed consultation

All other Character Policy Areas other than this area are proposed to transition to the Suburban Neighbourhood Zone. No one I have spoken with has been able to explain the rationale for this change to me. My efforts to understand the proposed change from a Character Policy area to a Housing Diversity Zone have included:

- Attending an information session run by Planning SA on December 2nd 2019 at the West Adelaide Football Club, where the presenters expressed surprise by the change from character to housing diversity when I raised my query.
• Speaking with Minister Knoll’s office, and being promised a response would be forthcoming from Planning SA – this did not eventuate.

• David Bevan asking the Minister on my behalf about this ill-fitting change via radio interview on ABC 891 – he was unable to answer the questions.

• Speaking with Planning SA staff – who eventually confirmed my worst fears regarding the rezoning of Housing Diversity.

• Despite my best efforts, I initially found it difficult to access the draft Planning and Design Code. Thus, the consultation process is flawed and is in contradiction with the Community Engagement Charter mandated under the Planning, Development and Infrastructure Act (2016).

• In relation to the above point, my local area has a large number of elderly residents, including elderly residents who are not fully literate in English. Many of these people are unable to access the usual forms of communication used these days. Today, Mrs Anne Hosking from 15 Ross Street Torrensville spoke to me concerned about her home and neighbourhood. She is living in the home her mother bought in 1938 – it is part of an original dairy which belonging to the Schofield family. There are remnants of this dairy in the vicinity and stables where the delivery horses lived. How can this history be treated with contempt? She had so much history to share yet she is unable to access email. She asked that I mention her position in my submission. This is another example of flawed consultation as many people are excluded from the consultation period.

• I printed a flyer and distributed it in my immediate neighbourhood on the weekend. For the last three days, I have been overwhelmed with calls coming from people who want help, either with writing a submission, sending a submission or both. Many were elderly or isolated due to disability.

• 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) are clearly not complied with.

Tree Canopy and Climate Resilience

The 30 Year Plan aims for an increase in tree canopy. However, the draft Code is in direct contradiction of this goal, by facilitating larger developments including a wide range of non-residential uses, terrace housing, row dwelling, group dwellings and residential flat buildings. Consequently, there would be much less private open space, fewer spaces for footpath trees due to ‘no minimum frontage’ and a net residential density of up to 70 dwellings per hectare. Regarding climate resilience in particular, the proposed changes would increase the urban heat footprint, and increase the temperature of the suburb. The impacts of urban heat should be minimised, not deliberately increased as a direct consequence of government planning policy. Biodiversity, open space, greening and climate change have received little attention in the code. Might I add that there has been a vast improvement in the greening of this suburb, and consequent birdlife over the past 36 years that I have lived here. Nevertheless, this is one of the least green areas in metropolitan Adelaide. This area relies heavily on private open space (private gardens) as there is a lack of public open and green space – this must be preserved as much as possible.

Non-residential land use

The new code will allow for non-residential uses, which will adversely affect traffic, parking, noise and the amenity of the suburb. This area is already experiencing parking stress and parking in my street and those surrounding is restricted for a maximum of two hours during business hours. Moreover, it is highly concerning that non-residential uses could spring up on properties adjoining mine. No one has been able to explain exactly what this means in practical terms. **I am strongly opposed to this component of Housing Diversity.**
Inconsistency with applying the code

In relation to the lack of rationale for this area transitioning to Housing Diversity. I have familiarised myself with the Planning and Design Consultation Map Viewer – which raises more questions than it answers. Why has our area been relegated to such an undesirable zone? According to the Government’s own document, the change to Housing Diversity is related to an area’s current density. Why then, for example, is an area in Richmond South, which is already relatively dense, being transitioned to Suburban Neighbourhood, while our area, which is currently low - to very low density being changed to Housing Diversity? See figures 1 and 2.

Figure 1. Frederick Street Richmond – under the planning reforms this area will become Suburban Neighbourhood.

Figure 2: Map showing Suburban Neighbourhood at Richmond including Frederick Street.
2. Urban Corridor objections

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) is proposed to be an “Urban Corridor Main Street” Zone.
- There is important background context that must be considered as part of the reforms for this area.
- When the Urban Corridor Zone was introduced for the City of West Torrens, the materials used for consultation with the community expressly implied that the development changes being proposed were for along the corridor itself (being Henley Beach Road), meaning that it must have corridor frontage and that what was being proposed were development changes along the corridor.
- Parts of the current zone are limited to Henley Beach Road Frontage - (HB Road east of South Road) but the majority of the western side of South Road extends through to streets to the rear of HB Rd, for example, Norma Street which are largely residential from the western end of Falcon Avenue. This is illogical – since there are homes to the rear of Henley Beach Road in this section – yet east of South Road there is rear lane access. How were these decisions made?
Since the changes to the Urban Corridor Zone has been introduced, it is clear that what was being consultation 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 at least one family have moved out in Norma Street – their peace of mind has been destroyed by the completely inappropriate submission at 6 Ebor Avenue – a proposal which has gained a great deal of notoriety. ‘Zone Creep’ is causing nervousness and disappointment in streets such as Norma Street Mile End and Rankine Road Torrensville.

There are two options that 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 which are residential, meaning west of Falcon Avenue along Norma Street Mile End 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 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 cannot be considered as part of the planning changes to correct 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 is zoned as ‘Urban Corridor Living’ Zone.

Attachment 1. Norma Street facing west the houses to the right have ended up in Urban Corridor zone and are thus at risk. The map shows the current corridor zone with red line showing the area that needs to be changed. Urban corridor is entirely inappropriate in Norma Street Mile End.

Thank you for reading my submission. I trust that you will consider my perspective and objections sincerely and with care. Our area deserves to be regarded in the same way as the rest of our historic suburb. Our community is rich and diverse. We have people of all ages, cultures and economic positions living harmoniously in this beautiful old suburb.
Many people have lived here for many decades and feel passionately about Mile End. We already experience our share of busy-ness that goes with an inner suburb. No matter where in Adelaide, residential areas should remain residential. Decisions made now are crucial for our city’s future. We need to value our heritage more. People in the future will thank us for this.

Margaret-Ann Copeland

MILE END SA 5031
Q1 Which part of the Planning and Design Code would you like to make a submission about? (Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)

My submission relates to Urban code. (click here for council areas)

Q2 Please provide your contact details below (Name, Postcode & Email are mandatory) Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name
margaret-ann copeland

Company
Ms

Address

Your Council Area
City of West Torrens

Suburbs/Town
mile end

State
SA

Postcode
5031

Country
Australia

Email Address

Q3 Which sector do you associate yourself with?

General Public

Q4 Would you like to make comment on

General comments
Q5 Enter your feedback for Rules of Interpretation

Respondent skipped this question

Q6 Enter your feedback for Referrals

Respondent skipped this question

Q7 Enter your feedback for Mapping

Respondent skipped this question

Q8 Enter your feedback for Table of Amendments

Respondent skipped this question

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Q9 Please enter your feedback for overlays click next at the bottom of the page for next topic

Respondent skipped this question

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Q10 Please enter your feedback for zones and subzones click next at the bottom of the page for next topic

Respondent skipped this question

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Q11 Please enter your feedback for general policy click next at the bottom of the page for next topic

Respondent skipped this question

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Q12 Please enter your feedback for Land use Definition click next at the bottom of the page for next topic

Respondent skipped this question

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Q13 Please enter your feedback for Admin Definitions click next at the bottom of the page for next topic

Respondent skipped this question

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Q14 Please enter your general feedback here

My address is currently zoned as a character policy area but for some reason, which I cannot understand has been tagged as changed to Housing Diversity. This is irrational and unnecessary. I strongly object to this on the grounds that this is currently a residential area, which is already experiencing significant residential infill. We are experiencing our share of infill while still maintaining the positive aspects of a neighbourhood which is still dominated by detached homes with gardens. The area has come a long way in the 36 years I have lived here with an increase in bird life due to the increase in the green canopy of the area.

Q15 Do you have any attachments to upload?(pdf only)  
Respondent skipped this question