



28 February 2020

State Planning Commission
ATTN: Mr Michael Lennon
GPO Box 1815
ADELAIDE SA 5001

By Email (Dpti.planningreformsubmissions@sa.gov.au)

Dear Mr Lennon

**RE: PHASE 3 – P&D CODE: SUBMISSION
HICKINBOTHAM GROUP – ESPLANADE, VICTOR HARBOR**

Heynen Planning Consultants has been engaged by the Hickinbotham Group to review Phase 3 of the Planning and Design Code (P&D Code) as it applies to their land at Lot 34 and 35 (8 and 9) Esplanade, Victor Harbor.

The Hickinbotham Group are the largest and longest established building group within South Australia and have developed over 60 community estates, constructed more than 100 000 homes and invested in excess of 2 billion dollars into the South Australian economy.

The Hickinbotham Group recognises the importance of an effective planning system and welcome the intent of the P&D Code given that its role is to deliver “*planning policy that is consistent and clear, making the planning process quicker, simpler and more equitable*”.¹

Noting the above intent, in our view, the proposed P&D Code zoning of the subject site (both Lots 34 and 35) is unduly restrictive and not consistent with the most desirable use of the land. The Hickinbotham Group submits that the zoning should be primarily residential and include provision for buildings of up to 5 storeys. This would allow and support the activation of “prime sites” and existing shops and service providers located within the heart of Victor Harbor. We concur with this position, noting that the draft Tourism Development zone is likely to result in an outcome where any activation of the land will be seasonal, rather than all year-round.

The Hickinbotham Group welcomes a zone that specifically envisages tourist accommodation along with traditional residential (i.e. owner occupied or long term leased) land uses. Such a mix provides opportunities for ‘non-traditional’ forms (i.e. the sharing economy, such as Airbnb) of tourist accommodation to be provided within buildings primarily dedicated to long-term residential use. Additionally, PO 1.4 and DTS 1.4 of the draft Tourism Development zone is overly limiting and should also be amended to specifically reference scenarios where wholly residential land-uses are appropriate (again to support the long term rental and shared accommodation) – if the zone is to remain (noting that the preference of the Hickinbotham Group is for the land to be differently zoned).

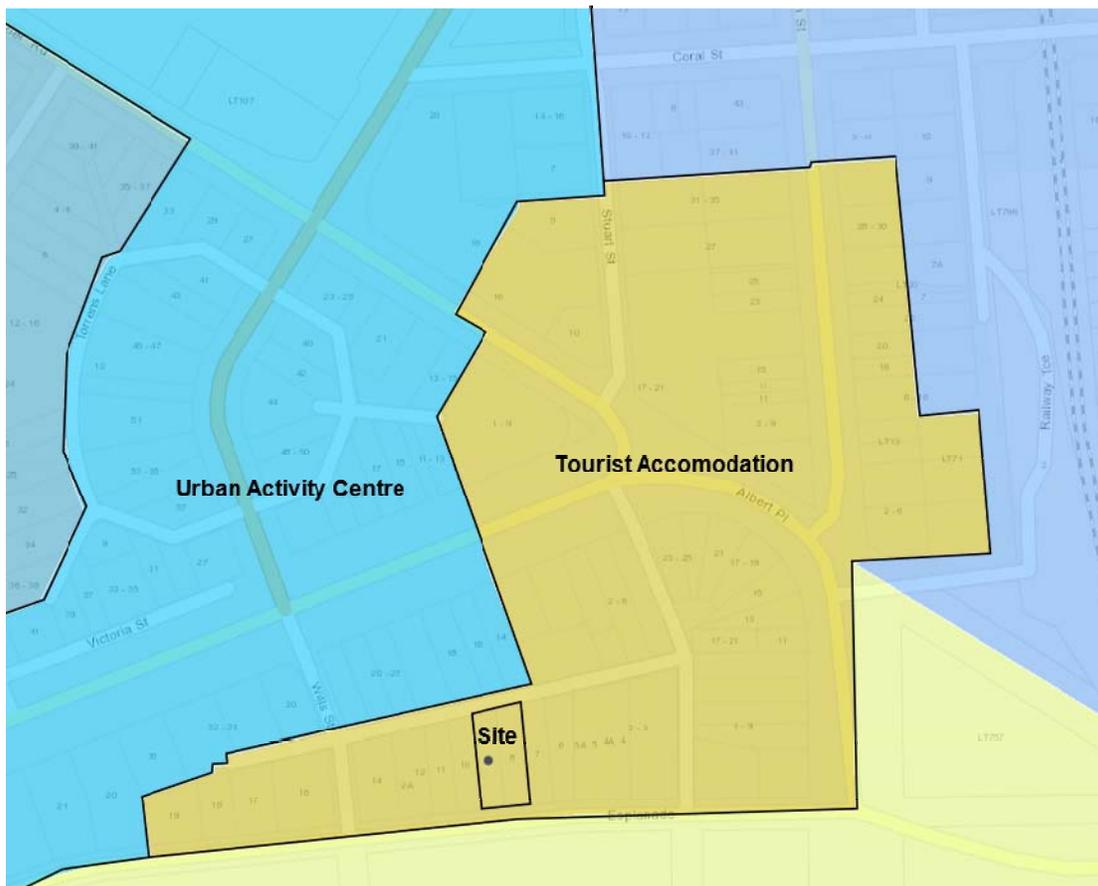
¹https://www.saplanningportal.sa.gov.au/planning_reforms/new_planning_tools/planning_and_design_code

We submit that the *Urban Activity Centre* zone with the addition of tourist accommodation would be the ideal zoning for the land as it provides a high degree of flexibility in the types of land-uses (residential and otherwise) that may be possible on the subject land. It is acknowledged that a 'Technical and Numeric Variation' would need to be added with respect to building height if this zoning was to be applied to the site (say to 5 storeys).

This zone is, in our view, the most appropriate for the land as it will allow for the activation of the land and generate positive outcomes for central Victor Harbor.

By way of parallel, I note that this zone is currently proposed to apply to the centre of Port Adelaide. There are clear similarities between Victor Harbor and Port Adelaide in terms of their importance to South Australia with respect to current and future residential tourism opportunities. The implementation of the P&D Code provides a once in a generation opportunity to stimulate the economy and shape the future of significant regional areas such as Victor Harbor.

Lastly, I note that the subject land is adjacent land proposed to be zoned as *Urban Activity Centre*;



Accordingly, simply removing the *Tourist Accomodation* zone and instead extending the *Urban Activity Centre* will allow for a more holistic and consistent planning outcome with respect to central Victor Harbor.

Put another way, the draft *Tourist Accomodation* zoning has been selected to mimic the current Development Plan zoning of the site. It is the case however that extending the *Urban Acitivity Centre* zoning, with our suggested amendments, will result in equal or greater tourism opportunities while facilitating other accommodation which would support the year-round demand for services and visitation of existing uses within central Victor Harbor.

Accordingly, in my view, zoning this land as an *Urban Activity Centre* will allow for the continued growth and activation of Victor Harbor by way of providing positive economic and social outcomes for the community of Victor Harbor, the Fleurieu Peninsula and South Australia.

I welcome discussion in relation to the submission on behalf of the Hickinbotham Group.

Yours faithfully



Garth Heynen, MPIA
BA Planning, Grad Dip Regional & Urban Planning, Grad Dip Property

cc. Hickinbotham Group, by email