



26 February 2020

Mr Michael Lennon
Chairman – State Planning Commission

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Dear Michael

RE: Planning and Design Code Phase 3 Submission – 46 Strathcona Avenue Clapham

We act for the Bedford Group, who are the owners of the land generally identified as 46 Strathcona Avenue, Clapham.

The subject site is a significant parcel of land within the local context. It is approximately 4.0 ha in area, which is relatively unique for a site which does not have frontage to an arterial road.

As identified by Figure 1, the land is not intensively developed. Buildings are primarily located in the southern and eastern portion of the site.

Known as Balyana, the site contains a conference centre together with accommodation and support services for people with disability. For many years the site contained a pool which was made available for school and community use.

The northern and central portion of the site contains a playing field/open space area, owned and managed by Bedford.

The site has multiple road frontages, including:

- Strathcona Avenue and O'Neil Street to the west;
- Grainger Street to the north (no vehicle access); and
- Alma Street to the south (no vehicle access).

A single driveway providing access from the apex of where Strathcona Avenue and O'Neil Street join.

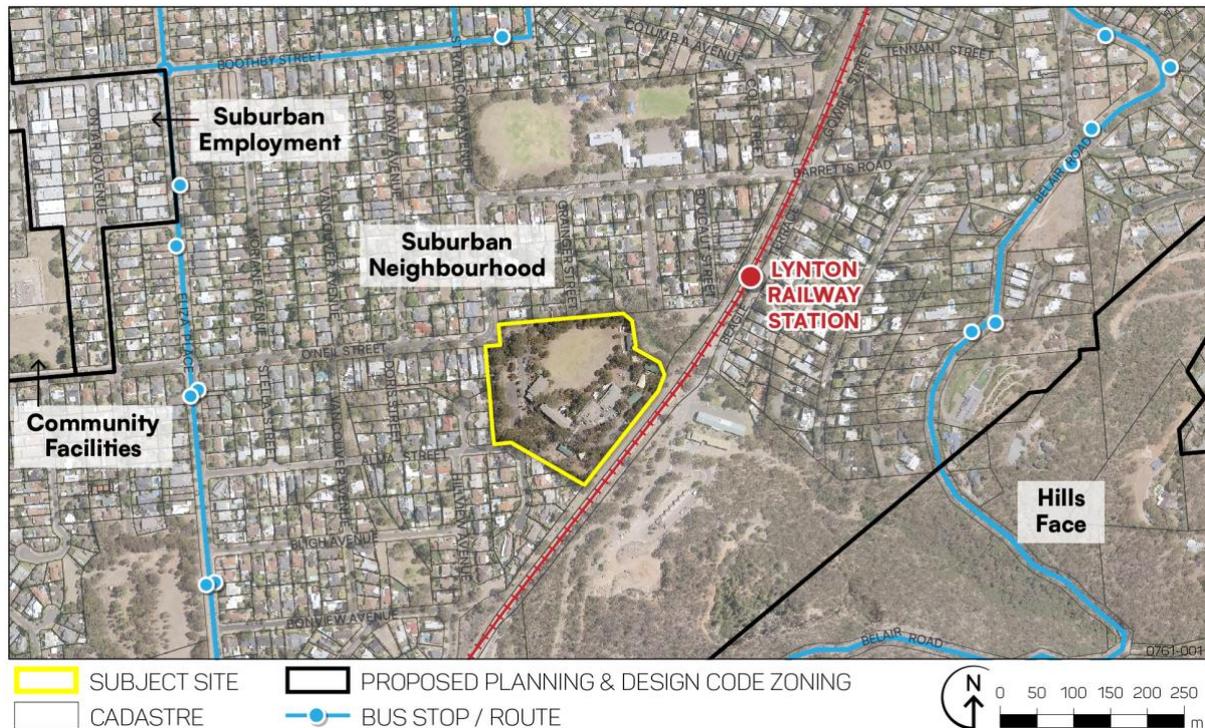
The eastern boundary of the land adjoins the Adelaide to Belair train line (which also accommodates interstate train services).

Housing in the locality primarily contains single storey detached dwelling stock, the majority of which would have been constructed more than 50 years ago. In our opinion, there is clear potential for the current housing stock to be increasingly replaced as dwellings reach the end of their economic life. In the short to medium term we could see the area accommodating higher dwelling densities as compared to current.

The site and its surrounds are presently located in the Residential (Central Plains) Zone, as identified by the Mitcham (City) Development Plan.

The draft Planning and Design Code – Phase 3, seeks to change the zone to Suburban Neighbourhood, with the proposed zoning shown as an overlay on Figure 1.

Figure 1: Subject Site and PDC Zone



The Bedford Group anticipates undertaking a strategic review of its property assets in order to identify opportunities to increase its range of services supporting disabled persons.

In this context, the Balyana site is clearly a strategic asset which could readily accommodate increased housing density in a manner which has minimal impact on adjacent land,

We note that the site offers significant potential for higher density (ie medium density) residential development on the basis of:

- No residential interface to the east;
- A direct interface with only 3 dwellings to the south;
- A direct interface with 5 dwellings to the west;
- A direct interface with only 2 dwellings to the north, together with 2 vacant allotments; and
- Close walking distance to bus services on Eliza Place and train services at Lynton railway station, approximately 180 metres to the east.

Given the potential of the site and the strategic planning process to be undertaken by the Bedford Group, it is opportune to review the draft Planning and Design Code – Phase 3, and to make submission in respect to the proposed Suburban Neighbourhood Zone.

In our submission the proposed Suburban Neighbourhood Zone does not establish the policy pre-conditions to enable Bedford to realise the true opportunity and value arising from the land.

Desired Outcome 1 and Performance Objective 4 for the Suburban Neighbourhood zone (as presently drafted) is stated as follows:

DO 1

Low or very low-density housing that is consistent with the existing local context and development pattern. Services and community facilities will contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character.

PO 4.1

Buildings contribute to a low-rise suburban character and complement the height of nearby buildings.

We note that low density means less than 35 dwelling units per hectare. We further note that low rise means up to and including 2 building levels.

Given the scale and setting of the site, we consider that a medium density and medium rise housing outcome would represent a more logical and appropriate policy outcome.

Medium density means 35 to 70 dwelling units per hectare, whilst medium rise means 3 to 6 building levels.

In this context, we do not consider the General Neighbourhood or Suburban Neighbourhood Zones to be suitable, as neither support medium density or medium rise housing outcomes.

In seeking alternative zones contained within the draft PDC, we note that there is no zone that neatly accommodates a medium density/medium rise outcome, other than the Urban Corridor Zones. This potentially identifies the need for an additional “urban infill master plan” zone in order to accommodate medium density/medium rise outcomes on large infill sites.

Alternatively, the Housing Renewal Neighbourhood Zone and/or the Master Planned Suburban Neighbourhood Zone could be amended to provide for increased density and height,

In our opinion, a rezoning which provides a medium density/medium rise outcome would create greater value and amenity for the site and locality and conform with the ambitions and intent of the 30 Year Plan for Greater Adelaide and the State Planning Policies (SPP).

We note such a rezoning proposal would be consistent with the following *Principles of Good Planning* as outlined in the SPP:

Urban renewal principles

- *Preference should be given to accommodating the expected growth of cities and towns through the logical consolidation and redevelopment of existing urban areas.*
- *Urban renewal should seek to make the best use (as appropriate) of underlying or latent potential associated with land, buildings and infrastructure.*

Activation and livability principles

- *Planning and design should promote mixed use neighbourhoods and buildings that support diverse economic and social activities.*

Investment facilitation principles

- *Planning and design should be undertaken with a view to strengthening the economic prosperity of the state and facilitating proposals that foster employment growth.*

We further note that medium rise development in this location would support the following SPP’s and associated principles:

1 INTEGRATED PLANNING

Integrated planning coordinates the strategic use of land with the necessary services and infrastructure. It can influence how a city or region grows and evolves, which if done well, creates livable and sustainable places that contribute to our prosperity.

- 1.7 *Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations supported by infrastructure, services and facilities.*

6 HOUSING SUPPLY AND DIVERSITY

Housing is an essential part of people's health and wellbeing. Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations. With the changing composition of our community and our desire to live more sustainably, our housing supply needs to become more diverse in both metropolitan Adelaide and regional township locations.

- 6.1 *A well-designed, diverse and affordable housing supply that responds to population growth and projections and the evolving demographic, social, cultural and lifestyle needs of our current and future communities.*
- 6.3 *Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.*

We would be pleased to further meet with DPTI staff in order to provide further detail in respect to this submission/request.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mj Osborn', written in a cursive style.

Michael Osborn
National Planning Manager

cc Bedford Group