

14 February 2020

Jim Gronthos
[REDACTED]
Mile End SA 5031

Department of Planning, Transport and Infrastructure
GPO Box 1815 Adelaide SA 5001
Email: DPTI.PlanningReformSubmissions@sa.gov.au

Dear Sir / Madam,

Draft Planning and Design Code – Phase Three

I am writing in relation to the draft Planning and design Code (the Code), with specific regard to the proposal to contain significant parts of the West Torrens Council inner city suburbs in particular Mile End (west of South Road) within the Housing Diversity Neighbourhood Zone (see attached map). I understand that the broad intent of the first iteration of the Code was to reflect, as close as possible, existing Development plan policy. I submit that this has not occurred in this instance.

Existing Development Plan Provisions

The area of Mile End (west of South Road) is located in a Residential Zone but also within the Cowandilla / Mile End West Character Policy Area 23. The Desired Character statement in this policy area envisages the following:

Allotments will vary in size from low density to very low density and are generally deep, with narrow frontages to main streets. Subdivision will reinforce the existing allotment pattern which is a significant positive feature of the policy area.

There will be predominantly one storey buildings, with some two storey buildings designed in a manner that is complementary to the single storey character of nearby buildings.

The Policy Area further envisages the following site areas for allotments:

PDC 3 Land division should create allotments with an area of greater than 270 square metres east of Bagot Avenue and 340 square metres west of Bagot Avenue.

It worth noting that this Policy Area applies to already established residential areas containing typically 700- 900 square metre allotments. Some sites within this Policy Area has progressively accommodated infill development, generally consistent with the policies (ie. hammer heads and semi-detached dwellings).

Proposed Housing Diversity Neighbourhood Zone

Of particular concern is the stated policy intent of this proposed zone. For example, while the desired Outcome rightly refers to 'low-rise' housing (ie 1-2 storeys), it then goes on to refer to 'medium density' housing (ie 35 – 70 dwellings per hectare). This significantly exceeds the current planning policy provisions for this Policy Area. It then goes on to include the following Performance Outcomes and Deemed to Satisfy provision:

PO 2.1

Allotments created for residential purposes accommodate a diverse range of low – medium density housing.

DTS/DPF 2.1

Development achieves a net residential density of up to 70 dwellings per hectare.

Clearly, these densities are significantly higher than those currently encouraged in Policy Area 23. For example, a net density of 70 dwellings per hectare equates to a minimum allotment size of 143 square metres per dwelling (for all dwelling types). This significant difference in minimum allotments size can hardly be referred to as being consistent with the current Development Plan provisions for Policy Area 23.

Recommendation

I submit that the stated intent of achieving policy consistency with existing Development Plans has not been achieved in this instance. The significantly higher densities allowed under the Code effectively transition these areas from a low form, low density Policy Area, to a low form, medium density zone. This will enable infill development at significantly higher densities than this that currently prevail and those that are currently allowed under the current Development plan.

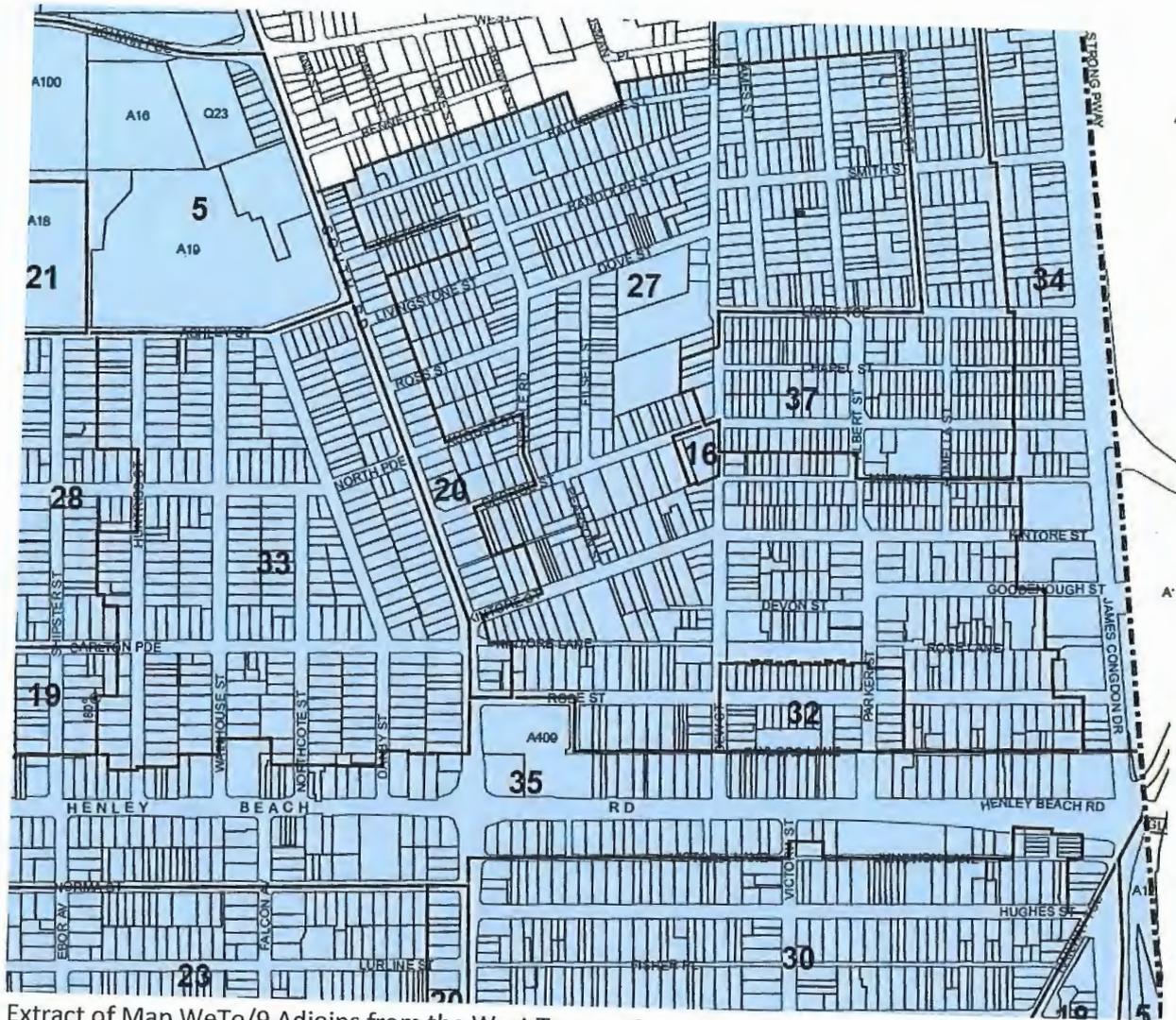
This significant shift in policy and resultant development potential has not been preceded with any assessment or analysis which justifies the policy change, assesses the carrying capacity of these areas to accommodate additional infill development (eg. road networks, stormwater systems), or considers the potential impacts of additional infill development on these specific areas. In short, there is no stated justification for the proposed changes.

I respectfully recommend that, either the areas referred to above (Policy Area 23 and other inner-city suburbs within the West Torrens Council affected by this proposed transition) are placed in an alternative, lower density residential zone (eg. General Neighbourhood Zone), or the Housing Diversity Neighbourhood Zone provisions relating to allowable densities/site areas are revised to reflect current expectations (ie a net density of up to 35 dwellings per hectare (low density)).

Yours sincerely



Jim Gronthos
Encl.



Extract of Map WeTo/9 Adjoins from the West Torrens Council Development plan showing an area (near bottom of map) of policy Area 23 proposed to be contained within the Housing Diversity Neighbourhood Zone