

From: [Margaret Dingle](#)
To: [DPTI:Planning Reform](#)
Subject: Historic Area overlay and character area overlay Submission
Date: Wednesday, 26 February 2020 9:22:44 PM

Dear Department of Planning Transport and Infrastructure

I have the following concerns and suggestions about the proposed planning code, and in particular on the Historic Area Overlay.

- 1 I consider that Councils should have the power to frame individual codes for historic overlay areas and character zones. This is because these vary in character and a "one-size fits all" planning regime is not likely to preserve the character of each area. Councils also should have time to revise these plans and make them more detailed if appropriate. This should be possible at any time but I would recommend a three month period for councils to do this before the planning code comes into effect.
- 2 Councils should be allowed to add further historic overlay and character areas.
- 3 Councils also should have the option of moving contributory items to the local heritage list if they consider it appropriate and of revising their local heritage list but they should be given time to consider this.
- 4 Significant/regulated trees should be protected and only removed if unsafe. Developers should be encouraged to build around existing large trees rather than removing them.
- 5 The primacy of the private car should be challenged and solutions involving improved public transport and cycling and walking facilities should be considered. Among other problems from excessive road building is the loss of heritage and damage to historic areas. Road upgrades should be based on safety, rather than catering for more traffic.
- 6 Some densification of the Adelaide metropolitan area is necessary to prevent sprawl, but the height, style and location of the dense areas needs to be considered carefully. Greater heights and densities are appropriate for TODs around railway stations and transport interchanges. The sensitive development (up to four storeys) of former industrial sites is appropriate but the nature of surrounding residential areas needs to be considered when setting heights. TODs and redeveloped industrial sites should include open space and trees.
- 7 I oppose removal of maps of historic overlay areas, as this lessens transparency. People have a right to know what can and cannot be done under planning laws.

Yours sincerely

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From: [Margaret Dingle](#)
To: [DPTI:Planning Reform](#)
Subject: addition to previous submission on
Date: Thursday, 27 February 2020 1:53:30 PM

Additions to SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 sent 26/2/20 by Margaret Dingle

In response to the draft Planning and Design Code – Phase 3, which is currently out for public consultation, I wish to register my strong objections to a number of issues as summarized below.

1. General Neighbourhood Zone and Housing Diversity Zone:

The draft Code places some areas in the General Neighbourhood Zone and the Housing Diversity Zone. The policy in these new zones is at odds with current zone policy and allows for a greater intensity of development than existing. The current zones focus on preserving character rather than accommodating change and infill and do not envisage a greater range and intensity of development than currently exists. I request that you move all residential areas to the Suburban Neighbourhood Zone with TNVs to match existing conditions.

2. a Siting and Setbacks: Under the Code, building setbacks from side and rear boundaries will noticeably decrease, particularly at upper levels. This is unacceptable and will severely impact amenity and privacy. Existing siting, setback and floor area criteria should be maintained throughout all our residential areas.

b Density and Allotment Sizes: The draft Code contains a number of errors and omissions. It is important that current minimum allotment sizes, heights and frontage widths match existing.

3. Historic Area Overlay

The lack of identification of Contributory Items in the Code, by either a map or list of addresses, will create uncertainty and confusion for owners, neighbours and prospective buyers. Existing protections and identification of Contributory Items should be maintained or the contributory items added to local heritage list.

The proposed demolition control wording is much weaker than what currently exists in Historic Conservation Zones. I request that the Code adopts the wording in the previous SA Planning Policy Library, and does not place inappropriate emphasis on front elevations, visibility of building facades and economic viability.

4. Commercial Centres

The Code places large scale centres in the same zone as small local shops, allowing large scale development and more intensive land uses throughout all these areas. This is inappropriate. A hierarchy of centres should be maintained. Additional zone(s) are needed to cater for the lower intensity local centres, particularly in older established areas. However, small shops should be allowed in larger shopping centres. There should be provision for community meeting places (halls, etc.) in areas where these are not available. However, in older areas these are often provided in the form of church halls, etc.

5. Public Notification

The Code should reflect our council's current Development Plan policy with respect to the notification of neighbours and the public. The Code should include notification for all development that increases development intensity, including additional dwellings on the site, two-storey development, earthworks where new dwelling is located 600mm above ground level, and change of use from residential to non-residential.

6. Tree Canopy and Climate Resilience

The 30-Year Plan for Greater Adelaide calls for an increase in tree canopy cover. However, the draft Code works directly against this by enabling larger developments and the increased removal of trees on both private and public land. This will result in a significant reduction in canopy cover, habitat loss and climate resilience, due the increased infill development opportunities, reduction in minimum site areas, site coverage, setbacks and increased number of street crossovers. Design of buildings to accommodate existing trees, e.g. u-shaped buildings and open courtyards, should be encouraged.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns, there will be an unacceptable loss of local character and amenity in my neighbourhood.

7. Solar access. Existing solar access should be preserved wherever possible and codes designed to facilitate continued insolation or when not feasible the transfer of solar cells without loss to the owner or lessee of the property where they were initially installed.

I trust that the concerns detailed above will be given your full consideration.

Yours sincerely

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