

State Planning Commission

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

To Whom it May Concern

SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 (City of Burnside)

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 summarised in the supplied Burnside Council proForma below with coloured personal amendment.

I have lived in a single home on a 800m²+ block located within this area (RPA21 of my Beaumont Ward), for over 35 years and the property was occupied by family since its' new construction in 1958. In this timeframe a significant percentage of the suburb's homes have been demolished and replaced with compliant row housing consisting of two fairly large residences on a sub divided block.

In nearly all circumstances this has resulted in significant reduction of tree cover, increased car parking on roadways resulting in difficulty accessing driveways and increased traffic issues.

There are several reasons for these shortcomings, roads are narrower in the suburb and many are curved such that parked cars have an increased effect on traffic access. The suburb and adjacent areas are attractive and affluent and residents have a high likelihood of car ownership. Many row houses built in the area already have single garages and short setbacks resulting in reduced onsite parking but many have two or more cars which then have to be parked on the roadway. The suburb's location is between major roads such that there is significant through traffic especially when traffic normally using the Eastern side of the city of Adelaide is diverted for extended periods for community events. There are quite a high number of sporting venues and schools in the area for its' size resulting in further increased parking and traffic issues at peak times.

It is quite common to have to pull in or even reverse to allow cars to pass when cars are parked each side of the road. This has ramifications with regard to service vehicles, garbage trucks and emergency services vehicles.

Local schools are among the best in the state and land ownership within the suburb is highly sought after to ensure children's attendance eligibility. These schools are already at capacity such that local residents' children cannot now be guaranteed entrance at their' local school.

While the situation is manageable at present there are still a high percentage of single homes within the area of increasing age (60+ years) that were built post war to a relatively low construction standard and have no heritage value. It is to be expected that most of these will be replaced in the immediate future, the majority will be replaced with high quality row homes and this expected density increase will exacerbate the above listed issues further.

As explained in the council letter below, tree coverage within the suburb is currently roughly at the level nominated under the State Government's *30-Year Plan for Greater Adelaide*. Within the suburb there is still a fairly high fauna level for a residential area. Koalas and birds of all sorts regularly travel through the suburb (many native), staying for a few days then moving on.

My own property sports a massive gum tree, now significant although I planted it only 30 years ago. The property is many times more comfortable and energy efficient than it was when I purchased it due to heavy Western tree shading, this is not practical with much smaller housing lots.

Allowing even the current level of development within the suburb must reduce the suburb's tree coverage below the nominated required level.

The effect of increased housing density even under the present development scheme will inevitably increase all of the above problems. Mandating even higher density construction is not acceptable or practical.

I request that you as a minimum maintain this area as a Suburban Neighbourhood Zone with TNVs to roughly match existing development conditions.

1. General Neighbourhood Zone

The draft Code places RPA21 of my Beaumont Ward, in the General Neighbourhood Zone. The policy in this new zone is entirely at odds with current zone policy and allows for a far greater intensity of development than existing. The current zone focuses on preserving character rather than accommodating change and infill and does not envisage a greater range and intensity of development. I request that you move all residential areas to the Suburban Neighbourhood Zone with TNVs to match existing conditions.

2. All Existing Residential Areas

- a) Non-Residential land use: Currently in the City of Burnside's residential areas, shops, offices and educational establishments are non-complying. In the new Code existing residential areas will allow these non-residential uses which will adversely impact traffic, parking, noise, neighbour's amenity and the character of our suburbs. This is unacceptable. All uses which are currently non-complying in our residential areas (eg. office and shop) should be "restricted development". Alternatively, a new zone should be created purely for residential land use.
- b) 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.
- c) 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, prospective buyers, neighbours and developers. Existing protections and identification of Contributory Items should be maintained.

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.

5. Public Notification

The Code should reflect the City of Burnside'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 calls for an increase in tree canopy cover, however, the draft Code works directly against this by facilitating larger developments and the easier 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.

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.

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

Yours sincerely

Brett Burford

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