

State Planning Commission

By email: [DPTI.PlanningReformSubmissions@sa.gov.au](mailto:DPTI.PlanningReformSubmissions@sa.gov.au)

To Whom it May Concern

26 February 2020

## **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 below.

### 1. General Neighbourhood Zone and Housing Diversity Zone:

The draft Code places some areas (RPA18, RPA20 and RPA28) of my Eastwood and Glenunga Ward in the City of Burnside, in the General Neighbourhood Zone ,and RPA19 in 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. All Existing Residential Areas

- a) Non-Residential land use: Currently in our council'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. Already traffic congestion in my particular area, adjacent to Glenunga International High School, is severe. The continued use of Bevington Road as a conduit between Portrush and Glen Osmond Roads for non-local traffic is a major concern with safety issues for both aged and the young. This is unacceptable, as is the congestion on traffic on Portrush Road and Glen Osmond road. 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. High density in such areas creates enormous practical problems such as parking, lack of green space and noise, not to mention the increased traffic.

- 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, neighbours and prospective buyers. 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 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. It is essential that residents be notified of proposed changes to adjacent property, and I am stunned that under a proposed new change this is to change. We live in our neighbourhoods, in the real world, and have a right to know what may affect us. Not all neighbours are community-minded; one of ours in particular has a large corner block, but always parks both cars in the street rather than his property, has uncontrolled dogs which constantly bark and will not participate in mediation. I am fearful that under the proposed changes he could add multiple dwellings to his property, or use for non-residential purposes, already he stores bobcats and machinery there. This would significantly devalue our properties and increase congestion both traffic and noise.

### 6. Impact on Infrastructure and Essential Services

The potential rate and intensity of new development which will be facilitated through the proposed Code policies, could place existing local infrastructure, especially roads and stormwater systems, under stress, particularly in our older established areas. Our roads have already been dug up and patched several times there have been many burst water pipes. Already the two major roads, Portrush and Glen Osmond, are seriously congested, the number of large trucks is totally unacceptable and energy should be put into the ringroute from Murray Bridge to help with traffic flow and increasing safety of local residents. This was I believe recommended a long time ago in the old MATS plan. I think that it should be done but without the new airport.

### 7. 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 to the increased infill development opportunities, reduction in minimum site areas, site coverage, setbacks and increased number of street crossovers. I would have thought that any current changes would be mindful of the need to be climate-aware. The birdlife nesting in trees along our road are likely to be impacted by increased housing density and height, plus more traffic. There are also koala bears strolling down streets at times.

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

Dr Susan Hughes

A solid black rectangular redaction box covering the signature area.

Glenunga SA 5064