

Submission for Draft Planning and Design Code

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It is clear that the community at large is very unhappy with, if not outraged by, what infill development has done to their suburbs' character and liveability. In Campbelltown, where we live, this is particularly evident, especially the development between Woodmere Ave and Gameau Rd Paradise, opposite the Interchange, which has destroyed the character of the area, is not sympathetic or integrated well with the existing surroundings and should not be allowed to happen again.

Changes in the planning and design code to address these huge problems are welcomed but the draft document is very confusing and unwieldy for the average resident to wade through and decipher. Unfortunately this suggests that a large number of people who would have had a comment to make may have given up on a submission because it was too hard.

We note (from Alison Collins DPTI) that the 30 year target of 70% infill was reached within 5 years. Instead of slowing it down or ceasing it, the target was increased to 85% !!! WHY ?? This is Adelaide Australia, not a European city and the elements of our once green suburbs that were so desirable are disappearing.

Michael Lennon refers to... (in the SPC Overview of Neighbourhood Growth and Change pamphlet) and this is repeated in fact sheets and discussion papers on the Code ... the community concerns about infill impact on loss of vegetation and tree canopy, traffic and parking on local streets, overshadowing, privacy, and overdevelopment with too much site coverage.

There are also concerns with lack of landscaping, removal of mature and significant trees, and too much impervious paving with little opportunity for water to be returned to the water table rather than being lost as stormwater runoff. The 'People and Neighbourhoods Discussion Paper' states runoff will increase by 2.5 times the volume the existing systems were designed to manage. The heat map for where we live shows greatly increasing temperatures because of this infill and it is vital this is addressed with the changes happening in our climate. WSUD and GI requirements for new development are vital to assist the cooling of our environment. The significant tree register needs to be extended so that more of our mature trees can be protected. For example, why was the Lemon-scented Gum, *Corymbia Citriodora*, taken off the protected list when we have beautiful mature examples, over 50yrs old, throughout our suburbs? It should be reinstated.

Design in our area has been poor and environmentally unsound with a lack of eaves and no articulation to protect walls and windows from the sun resulting in greater heat and more use of air-conditioning. Solar panels have been significantly absent.

The new code must address these issues and not just with lip service. It must align development outcomes with community expectations. It seems that developers are favoured over the community when it comes to making decisions, when there should be equal weight given to each. A developer builds, makes money, moves out, and the local Council and community has to live with the consequences and shortfalls.

Addressing the shortfall of onsite parking is important, as is increasing garage sizes. But we don't see provision for extra storage outside of garages which are currently being used for storage in many developments with cars then being parked on the street. Storage should be included. Where visitor parking requirements state "0.33 spaces per dwelling where development involves 3 or more dwellings" this should always be rounded up to the next whole number and there should be no variation considered to the formula where less parks are approved. We see in our area where current on-site parking is woefully inadequate and local, narrow streets then become permanent car parks.

The preservation of State and Local Heritage areas is vitally important. A single universal policy, while simple may not adequately take into account what is important to local communities. Councils use different policies regarding

Character Areas, Historic Conservation Zones, and Heritage buildings. A proposed single policy must marry all of those policies so that local knowledge and ethos is still valued and respected. Our history needs to be protected in the face of change and “progress”. It is concerning that one central body may make these decisions about status and heritage without local input. Will there be opportunity for consultation and a right of appeal?

Regarding Assessment Pathways, it is concerning that Deemed-To-Satisfy gets an automatic tick even with minor variations to the criteria. This seems to be contradicted by the fact that for Accepted Development and Deemed-To-Satisfy Development the Code states “All criteria applicable to a development must be satisfied”. We have seen too many developments approved with a ‘near enough is good enough’ approach. The rules should be hard and fast! And who gets to decide whether these variations are minor? Who decides if a development “is of a minor nature only and will not unreasonably impact on the amenity of adjacent land” and so will be exempt from public notification? Local councils and their elected reps have their communities at heart and the local knowledge to make these decisions. It is wrong that local development assessment panels have only one Council rep now and are weighted towards developers and those in the building or real estate industry. There should be more Council reps on these panels. The “accredited professionals across the state” do not have the community connection to the decisions needing to be made. It is therefore easy for them to make a decision on an academic basis without regard to local community feelings and expectations. These decision makers do not have to live with the consequences. And we’re sure they wouldn’t be visiting all the sites to get a feel for the area and the people who live there.

When a development becomes Performance Assessed and Public Notification is required, the new Code may have a “cleaner” process but it seems the public right to know and be informed is being eroded. All property owners/occupiers within a 100m radius (not 60m as suggested in the Code) should be notified. What right of appeal does the public have when a decision is made? Currently the public can appeal through the ERD Court.

Another important issue which we cannot see as being addressed is the ability of a developer to submit variations to the plan after it has been approved. This should NOT be allowed to happen! When the plans have been through the appropriate consultation process, changes should not be allowed to be made without further notification and consultation. What was approved is what should be built! We have seen a developer in our area opposite the Paradise Interchange submit at least 15 variations to his approved plan without the neighbours being able to comment on them so that the final development has little relation to what was originally approved. This applies to landscaping as well.

We refer again to the confusing nature of this Draft Code with relation to Classification Criteria. For example, P.437, Table 2 listing Ancillary Accommodation, under General Development Policies, lists Design in Urban Areas [All Residential Development-Ancillary Development]: DTS 17.1, 17.2. It took 3 emails to Council and DPTI and finally a phone call before it was adequately explained to us where to find this information i.e. what DTS 17.1 is. Even then, we could find no reference to any 17.2. Why isn’t there a table that lists all these criteria in numerical order with clear directions on where to find it, instead of in so many different sections?? And we’re still confused as to where Performance Outcomes and Designated Performance Features come into play.

Finally, we wish to stress, that after much hard work and lobbying, Campbelltown Council and community finally made headway with a government approved DPA last September and we do NOT want to lose those gains we made when this new code is finalised. For example, our DPA lists minimum site area for a Row Dwelling as 250m² and the Draft Code has reduced this to 200m². *This must be changed to 250m²*. This new Code must be better, not worse, than what we have had to deal with in the last few years.

Our once beautiful, green, suburb has been irrevocably changed, its character and mature trees lost forever. We must ensure that this does not continue to happen and new planning laws are sympathetic to established neighbourhoods and their people.