

26 February 2020

Mr Michael Lennon
Chairman – State Planning Commission

By email: dpti.planningreformsubmissions@sa.gov.au

Ground Floor,
89 King William Street
GPO Box 2403
Adelaide SA 5001
PH: 08 8221 5511
W: www.futureurbangroup.com
E: info@futureurbangroup.com
ABN: 34 452 110 398

Dear Mr Lennon,

**RE: PLANNING AND DESIGN CODE PHASE 3 SUBMISSION
2 KODARO ROAD, MARINO**

We act for Mr. Peter Blazincic, the owner of 2 Kodaro Road, Marino ('the subject site'), presently a vacant parcel of land.

The subject site is over 11 hectares in area. It is identified by the Marion Council Development Plan as being located within the Hills Face Zone. The Residential Zone (Foothills and Seaside Policy Area 23) adjoins the subject site to the west and partially to the south, and Conservation Zone to the north.

Figure 1 *Subject site and existing zone*



Mr. Blazincic has a vision to eventually develop the land for low density housing purposes, recognising the strategic potential of the site.

We note that the site offers significant potential for low density residential development on the basis of:

- Close proximity to road and public transport infrastructure, including the Seaford Rail Line and Hallett Cove Railway Station;
- Close proximity to the Marino to Willunga Bikeway which passes through McLaren Vale;
- Close proximity to multiple open spaces, ie. Marino Beach, Marino Conservation Park, Hallett Cove Conservation Park;
- Adjoining a zone with minimum allotment sizes of 350 square metres;
- Future development will continue to not be viewed from the Adelaide Plain.

Mr. Blazincic has a vision to:

- Create allotments of between 600 square metres to 900 square metres;
- Focus on a green and carbon-free residential character where large expanses of publicly accessible open space will be integrated with Water Sensitive Urban Design measures;
- Open space to establish a key link through the subject site to connect with surrounding open space and recreation areas;
- Develop residential properties with the highest standards of energy efficiency, water conservation and landscape quality.

Given the vision of Mr. Blazincic, it is opportune to review the draft Planning and Design Code – Phase 3, and to make a submission noting the intent to seek a future rezoning.

In terms of zoning, the draft Planning and Design Code – Phase 3 proposes the following outcomes for the land and locality, which for clarity are reproduced in Figure 2 (over page):

- Conversion of the current Residential Zone (Foothills and Seaside Policy Area 23) to the General Neighbourhood Zone;
- Current Hills Face Zone remains as such; and
- Current separated zones; Conservation Zone and Coastal Conservation to be combined to form the Conservation Zone.

As anticipated, the draft Planning and Design Code – Phase 3 has proposed a 'like for like' rezoning for the subject site.

However, in terms of forward planning, noting the low density residential development vision of Mr. Blazincic, and having regard to the various residential zones contained within the draft Planning and Design Code, we consider that the subject site could reasonably be rezoned to Suburban Neighbourhood Zone with an appropriate TMV overlay for frontage and size. The suitability of this zone to accommodate the proposed vision is demonstrated by the following brief analysis.

Figure 2 Draft Planning and Design Code – Phase 3 zoning



Desired Outcome 1 for the zone (as presently drafted) is stated as follows:

DO 1

Low or very low-density housing that is consistent with the existing local context and development pattern. Services and community facilities will contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character.

DO 2

Development on sloping land that is sensitive to the topography of the area and minimises environmental and visual impacts.

Some key Performance Objectives which support the proposed concept vision include:

PO 1.1

Residential development and supporting uses that provide housing and supporting services and facilities that preserve a low density residential character.

PO 1.2

Dwellings complement the low-density or very low-density character of the neighbourhood.

PO 2.2

Allotments/sites created for residential purposes are of suitable size and dimension to accommodate residential development that is sensitive to the topography of the locality.

PO 4.1

Buildings contribute to a low-rise suburban character and complement the height of nearby buildings.

We do not consider the General Neighbourhood Zone to be suitable, as this supports a much higher density and we do not consider the Residential Neighbourhood Zone to be suitable, as this does not take much consideration into the slope of the land.

Our submission is best summarised by Figure 3 below, which shows an alternative zone for the subject site, with a portion of the Hills Face Zone replaced with Suburban Neighbourhood Zone. We consider that this will facilitate an appropriate transition between the General Neighbourhood Zone of low and medium density and the Hills Face Zone of natural topography and open landscape.

Figure 3 Recommended Zone



In our opinion, such rezoning would create greater value and amenity for the site and locality and conform with the ambitions and intent of the 30 Year Plan for Greater Adelaide and the State Planning Policies (SPP).

We note the proposal would be consistent with the following *Principles of Good Planning* as outlined in the SPP:

Urban Renewal principles

- *Preference should be given to accommodating the expected growth of cities and towns through the logical consolidation and redevelopment of existing urban areas.*
- *Urban renewal should seek to make the best use (as appropriate) of underlying or latent potential associated with land, buildings and infrastructure.*

Activation and liveability principles

- *Planning and design should promote mixed use neighbourhoods and buildings that support diverse economic and social activities.*

Investment facilitation principles

- *Planning and design should be undertaken with a view to strengthening the economic prosperity of the state and facilitating proposals that foster employment growth.*

We further note that low scale and low density residential development in this location would support the following SPP’s and associated principles:

1 INTEGRATED PLANNING

Integrated planning coordinates the strategic use of land with the necessary services and infrastructure. It can influence how a city or region grows and evolves, which if done well, creates liveable and sustainable places that contribute to our prosperity.

- 1.1 *An adequate supply of land (well serviced by infrastructure) is available that can accommodate housing and employment growth over the relevant forecast period.*
- 1.3 *Plan growth in areas of the state that is connected to and integrated with, existing and proposed public transport routes, infrastructure, services and employment lands.*
- 1.7 *Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations and supported by infrastructure, services and facilities.*

6 HOUSING SUPPLY AND DIVERSITY

Housing is an essential part of people’s health and wellbeing. Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations. With the changing composition of our community and our desire to live more sustainably, our housing supply needs to become more diverse in both metropolitan Adelaide and regional township locations.

- 6.1 *A well-designed, diverse and affordable housing supply that responds to population growth and projections and the evolving demographic, social, cultural and lifestyle needs of our current and future communities.*
- 6.3 *Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space.*

Should our suggested amendment not be adopted as part of this Phase 3 consultation process, we flag the intent to initiate a Code Amendment process as soon as practical after commencement of the Code.

We would be pleased to further meet with DPTI staff in order to provide further detail in respect to this submission/request.

Yours sincerely,

A handwritten signature in black ink that reads "Chris Vounasis".

Chris Vounasis
Managing Director