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To: [DPTI:Planning Reform Submissions](#)
Subject: SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3
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SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3

This submission details my strong objection to the following aspects of the draft planning and design code.

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 recognise and accommodate existing character rather than favouring change and infill. This is not an outdated or irrelevant consideration for urban planning. It can be met by moving all residential areas to the Suburban Neighbourhood Zone with TNVs to match existing conditions.

2. Existing Residential Areas

a) Non-Residential land use: Currently in our council's residential areas, non-residential uses such as shops, offices and educational establishments are identified as non-complying uses.. In the new Code existing residential areas will allow these non-residential uses, but no provision has been made for limiting their adverse impact on traffic intensity, demands on parking space, neighbour's amenity and the character of our suburbs. This is unacceptable. It amounts to planning for the purpose of making so-called residential areas unliveable – a spectacular and absurdly oxymoronic planning outcome that is explicitly not in the interests of residents, and inimical to the objective of structuring a city and its parts in a way that allows all to flourish.. All uses which are currently non-complying in our residential areas 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.

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. The reasons publicly advanced in support of abandoning the notion of contributory items simply do not pass the pub test. Further, they in essence proposes throwing out the baby with the bathwater. That there is inconsistency in the quality and rigour of the past work done to identify contributory items in various places does not make a case for abandoning such good work as has been done. It makes the case for retaining the value represented by good-quality work, and providing time and support for bringing other attempts to identify contributory items up to standard.

There should be provision to freeze the present situation to enable contributory-item listings to be brought to an acceptable standard. .

The proposed demolition control wording is much weaker than what currently exists in Historic Conservation Zones. The Code should adopt the wording in the previous SA Planning Policy Library. The proposed emphasis on front elevations, visibility of building facades and economic viability is mechanistic and

inadequate to the task. Its claim on rigor and equity is illusory..

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 crude and inflexible – the antithesis of what planning should provide. 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.

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. No mechanism appears to exist for taking these matters into account. Is that planning? Really?

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

the increased infill development opportunities, reduction in minimum site areas, site coverage, setbacks and increased number of street crossovers.

It is almost beyond belief that, in this era of dangerous climate change,, a framework of proposals should be put forward which goes out of its way to facilitate an increase in paved and built areas and the consequent enhancement of an urban heat bank and to almost compel a decrease in greened open space and tree cover with their known climate-amelioration effects (quite apart from other aspects of amenity).

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. It should go without saying, because it is obvious, but experience has taught me not to assume that the obvious will be heeded so I will say it. My neighbourhood will not be alone in suffering this detriment. My city will be ruined.

I commend these consideration to your attention.

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