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To: [DPTI:Planning Reform Submissions](#)
Cc: bragg@parliament.sa.gov.au
Subject: SUBMISSION ON PLANNING & DESIGN CODE
Date: Tuesday, 18 February 2020 10:55:15 AM

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, we wish to register our strong objections to a number of issues as summarised below.

The “one-size fits all” approach will negatively impact our neighbourhood, our council, Adelaide and its urban areas. One coat of paint doesn’t suit all.....

An ambitious undertaking not without merit in its objectives however the respective supporting portal and its links is voluminous, without clarity and evidence the expected outcomes are the best way forward to the overall benefit of the State. There are contradictions with other State policies and we question whether the State Government has plugged this Code into an overarching vision and plan for the State that minimises contradictions.

The most obvious conflict is with Climate Resilience. More infill, more concrete, greater population density, greater traffic with less trees, canopy and natural greenery. How does this fit in with The South Australian Government’s Climate Change Adaption Plan. Light coloured roofs, moving to a carbon neutral city, roof gardens are all common-sense and need to be adopted but don’t make up for losing the greenery in the first place. Should be complementary, not band-aids to cover the damage of greater housing density.

The 30 - Year Plan for Greater Adelaide calls for an increase in tree canopy cover, however this draft Code works directly against this by enabling larger developments and the increased removal of trees on 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.

We want assurance that this Code is aligned with **effective** State and National plans to address the climate crisis.

We also fully support the following additional points raised by the City of Burnside Council.

General Neighbourhood Zone and Housing Diversity Zone.

The draft Code places some areas of Burnside in the General Neighbourhood Zone and the Housing Diversity Zone. The policy in these new zones is at odds with the current zone policy and allows for greater intensity of development than existing. The existing zones focus on preserving character and do not envisage a greater diversity of development as per the change and infill as with the proposed Code. We request you move all residential areas to the Suburban Neighbourhood Zone with TNVs to match existing conditions.

All Existing Residential Areas.

a) Non-Residential land use: Currently shops, offices, workshops and educational establishments are non-compliant with our residential areas. 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 that are currently non-compliant in our residential areas (e.g. offices, shops,

workshops) 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 will severely impact amenity and privacy. This is unacceptable. Existing siting, setback and floor area criteria should be maintained throughout all our residential areas.

c. Density and Allotment Sizes: The draft Code contains errors and omissions. It is important that current minimum allotment sizes, heights and frontage widths match existing.

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 zones are needed to cater for the lower intensity local centres.

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.

Impact on Infrastructure and Essential Services.

The potential rate and intensity of new development which will be accelerated through the proposed Code policies, will place existing local infrastructure, especially roads, water systems and essential services, under stress, particularly in our older established areas.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns, there will be an unacceptable loss of heritage, local character and amenity in our neighbourhood, as well as the benefit, well being, prosperity and confidence in our State.

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

Yours sincerely

Mike and Karen Slee


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