

**From:** [Deborah White](#)  
**To:** [DPTI:Planning Reform Submissions](#)  
**Subject:** Resident Submission on Planning & Design Code: Kensington Park  
**Date:** Friday, 28 February 2020 12:36:25 AM  
**Attachments:** [ResidentSubmissionKensingtonParkDWhite.pdf](#)

---

**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, I wish to register my strong objections to a number of issues, as summarised in the attached document.

I trust that the concerns detailed in my submission will be given your full consideration.

Yours sincerely

Dr Deborah White



Beulah Park

SA 5067

State Planning Commission

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

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, I wish to register my strong objections to a number of issues as summarised below.

### 1. General Neighbourhood Zone

The draft Code places some areas (RPA2 & RPA5) of my Kensington Park Ward, in the General Neighbourhood Zone. The policy in this new zone is entirely at odds with current zone policy and allows for a far greater intensity of development than existing. The current zone focuses on preserving character rather than accommodating change and infill, and does not envisage a greater range and intensity of development. 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 the City of Burnside'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. This is unacceptable. 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.
- 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

Many residents of my part of Burnside, committed to protecting the unique character of our built and natural heritage, worked hard in the past to contribute to the establishment of Historic (Conservation) Zones.

To quote the Burnside City Council factsheet on Local Heritage Places ([www.burnside.sa.gov.au/files/assets/...](http://www.burnside.sa.gov.au/files/assets/...)):

"The conservation of built heritage gives the community a sense of historical perspective, a framework for future development, recognisable links with people and events in history, and a sense of community pride and stability in a rapidly changing world. The conserved buildings of a city are its 'autobiography' – they contribute to a city's environmental amenity as a place for the activities of daily living, business and leisure. 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, prospective buyers, neighbours and developers. 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 the City of Burnside'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. Tree Canopy and Climate Resilience

The 30-Year Plan calls for an increase in tree canopy cover; however the draft Code works directly against this by facilitating larger developments, and the easier removal of trees on both private and public land.

Increased infill development opportunities, the reduction in minimum site areas and setbacks, and the resulting increase in the number of street crossovers, would bring about a significant reduction in tree canopy cover, and thus habitat loss. In combination with the resulting increase in impermeable site coverage, these changes would have a detrimental effect not only on the character and amenity of the suburb, but run counter to good urban planning practice aimed at developing climate resilience; this is particularly unacceptable in this time of increasing awareness of the potentially disastrous ecological, social, cultural (and inevitably economic) effects of climate change.

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 Deborah White

  
Beulah Park  
SA 5067