

**From:** [Di Wilkins](#)  
**To:** [DPTI:Planning Reform Submissions](#)  
**Subject:** Submission to DPTI  
**Date:** Friday, 28 February 2020 11:30:05 PM  
**Attachments:** [200228 Ltr to DPTI Planning Commission.docx](#)

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I attach my comments on the flawed Draft Planning & Design Code proposal which is being imposed on the community in SA.

Needless to say, I oppose this whole process and Proposal and I have absolutely no confidence in the State Planning Commission of SA and its Chairperson.

*Di Wilkins*

[REDACTED]

*EASTWOOD SA 5063*

[REDACTED]

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*Eastwood is one of 9 important policy areas in the Heritage Conservation Zone in the City of Burnside*

## State Planning Commission

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

### **SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 (City of Burnside)**

In response to the draft, extremely flawed, Planning and Design Code – Phase 3, which is currently out for ‘public consultation’, and in response to the proposed changes to our State Planning Laws, I wish to vehemently express my strong objections to a number of issues as summarised below, that will if implemented, adversely affect my immediate neighbourhood in the City of Burnside and other local government areas in South Australia.

This whole proposal ‘dumbs down’ and aims to ‘homogenise’ our unique diversity in the historic colonial 1836 designed and settled City of Adelaide. If it succeeds, it will devalue our unique opportunity in the built and natural heritage tourism space in our free settled State of Australia.

- **General Neighbourhood Zone and Housing Diversity Zone:**

The draft Code places some areas (PRA18, RPA20 & RPA28) of my **Eastwood & Glenunga Ward**, in the General Neighbourhood Zone, and RPA19 in 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 focus on preserving character rather than accommodating change and infill and do not envisage a greater range and intensity of development than currently exists. I request that you vehemently move all residential areas to the Suburban Neighbourhood Zone with TNVs to match existing conditions.

#### **All Existing Residential Areas**

- **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.
- **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.
- **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.**

- **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, prospective buyers, neighbours and developers. **Existing protections and identification of the current 1567 Contributory Items should be maintained and further character buildings added to these Zones.** I and my neighbours value the 'connected community' created in our historic neighbourhood of Eastwood by our 1880 pioneers and the builders, Wark and Hogg. It is treasured and valued by all. Extra protection needs to include **strict Demolition Control over these historic built legacies from our early pioneers**, which collectively contribute to the historic and architectural character of our neighbourhoods.

The City of Burnside has 9 Policy Areas which comprise our Historic Conservation Zones (HCZ's) in our City. In September 2004, the City of Burnside developed our Historic Conservation Zone no 2 PAR with extensive research conducted and recorded by MacDougall & Vines, Heritage Consultants, with public forums, consultations, Council workshops and public hearings with residents in our community, before this Heritage PAR was subsequently adopted by Council in 2006.

- **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 totally 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.

- **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.** All residents want to know what is proposed to be built next door or in their street and neighbourhood. Former Minister Rau's plan was always to reduce the **local community having a say in the type, style and size of development that was being proposed in their Council Ward.** Just look at the current 'bunker'/ house being built on Prescott Tce which is **totally incompatible with the historic neighbourhood of Rose Park & vehemently opposed by neighbours, but approved by the majority of independent members of the Council Assessment Panel.**

Since May 2006, the then Minister Holloway reduced the number of Council members on the Development Assessment Panel, from all 13 Elected Members (EM) to only 3, 3 independent members and a specialist independent Chair person, a total of 7 members.

The number of EM's on the current Council Assessment Panel (CAP) has been reduced to only one local EM's voice for residents. Residents feel very strongly, that the CAP has devalued the voice of local residents in favour of developers, planners and architects in many DAP & CAP development decisions in subsequent years. This has been a planned & politically deliberate reduction in the voice of the local community in development decisions in our local neighbourhoods.

- **Tree Canopy, Climate Resilience and Sustainability**

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.** 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.**

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

*Di Wilkins*

[REDACTED]

*EASTWOOD SA 5063*

*T/F: [REDACTED]*

*M: [REDACTED]*

*E: [REDACTED]*

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28 February 2020