

18 December 2020

Reference: 0062

Michael Lennon
Chair
South Australian Planning Commission

Attention: Michael Lennon

By Email: DIT.planningreformsubmissions@sa.gov.au

Dear Mr Lennon,

DULWICH

We act for Adcorp Property Group in respect of their site at 231 Greenhill Road, Dulwich. The site is in a Business Neighbourhood Zone, along the northern side of Greenhill Road, close to Fullarton Road.

We wish to express our concern regarding the provisions relating to the site, and the limits they place on the development of this site. Specifically, this in terms of the limits in floor area, the lack of building envelopes, and the Technical and Numeric Variations applied to the site.

Firstly, DTS / DPF 1.2 only envisages non-residential development with a floor area of <250m², with a similar principle in DTS / DPF 1.3. This fails to take into account the size of sites, and what development may be appropriate on sites of larger size. DTS / DPF 1.2 is also a trigger for public notification under the Procedural Matters section.

By way of example, the existing office on the site is repurposed from a single-storey dwelling. This building has a floor area of around 380m². Therefore, given the wording of DTS / DPF 1.2 and 1.3, and its inclusion in the Procedural Matters section, an application for a change of use from a dwelling to an office, such as was the case for the existing building, would require public notification. It seems ridiculous that moving to an envisaged land use, without any external alterations, would require notification, and an unnecessarily lengthy assessment process; particularly given the low impact of such a small development.

By further example, this limit does not seem consistent with the other provisions of the Zone. The other provisions of the Zone (assuming no TNV's) would allow for a two storey development with up to 60% site coverage. Given this site is roughly 1,100m², such a development would have a gross leasable floor area of 1,320m², more than five times that given as the example under the DPF. Given how DPF's are expected to be applied as a metric, and the public notification required, this puts medium-sized and large sites at a significant disadvantage.

It should be noted at this point that the site has two conflicting TNV's relating to building height. The Maximum Building Height (metres) TNV allows for 8m, while the Maximum Building Height (levels) TNV only allows 1 storey. Given the existing Development Plan policy of 2 storeys, this is plainly unsound, and should be removed.

Aside from the misapplied TNV, we have further concerns relating to the way building height is addressed. The site sits on a key corridor, with easy access to open space

and public transport. It is the sort of site where densification is envisaged in order to meet the outcomes of the 30 Year Plan for Greater Adelaide, and the State Planning Policies. To this end, heights of up to seven storeys are envisaged along Fullarton Road, and eight storeys across Greenhill Road in Glenside. Furthermore, given the site faces a road to the south, it will not have any overshadowing implications for residential properties to the north. Therefore, this is a site perfectly suited to higher rise development.

Under the policy proposed in this version of the Code, this would not be permitted, specifically looking at DTS / DPF, and PO 3.1. We make the case that instead of applying height limits through TNV's and interface requirements, this would be better served through building envelopes. There is currently no mention of building envelopes in the provisions, yet these provide an ideal way to ensure that medium and large sites minimise their impacts on adjoining residents. Allowing the use of a building envelope to override a TNV and the other height provisions would allow for a development to be stepped away from the boundary with those residents in order to minimise bulk and overlooking, providing the desired outcomes of the SPP's and the 30 Year Plan. This is also consistent with DO1 of the Zone, which envisages "additional height accommodated in highly accessible location(s), particularly locations well serviced by community or public transport", such as the site.

In summary, we believe that if the currently proposed zone is to remain, the Code should be amended to ensure that it can achieve the desired outcomes for the appropriate development of this site, and others like it. We look especially to the removal of floor area as a trigger for public notification and the provisions discouraging development over 250m², given the inequities that this creates against larger sites. We also request the inclusion of building envelopes to allow for more appropriate development which can take advantage of the key position of sites like this, in order to achieve the desired outcomes.

As an alternative, the boundary to the adjacent Urban Corridor (Boulevard) Zone could be shifted eastward along Greenhill Road to incorporate this site. This would be a logical approach which is consistent with the original intent of the 2013 Inner Rim DPA and which was applied over the majority of the Greenhill Road and Fullarton Road commercial precincts.

We would be pleased to be heard with respect to this matter.

Yours sincerely,



Stephen Holmes
Director