

From: [Sadasivam Karuppannan](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Objection/Suggestion to Draft Planning and Design Code
Date: Tuesday, 4 February 2020 4:14:06 PM
Attachments: [Map of affected area.pdf](#)

Dear Sir/Madam,

I would like to make a submission to the Draft Planning and Design Code.

The draft Planning and Design Code shows the proposed Maximum Building Height for Leabrook (Policy Area R10), Erindale (Policy Area R12) is 6 meters and one storey development. The Maximum Building Height for adjoining few suburbs namely Kensington Park (Policy Area R6), Rosslyn Park (Policy Area R8), part of Magill (Policy Area R4) is 6.5 meters, one storey development. In the Draft Planning and Design Code these five suburbs appear to be a small island where severe building height restrictions are proposed. See the attached map. Existing Development Plan regulations allows a choice of single or two storey housing and that should be retained.

Proposed maximum building height for vast majority of areas located in the eastern, southern and western Adelaide in General Neighbourhood Zones is at least 9.0 meters permitting two or more storeys. The same should be applied in Leabrook (R10), Erindale (R12), Kensington Park (R6), Rosslyn Park (R8), part of Magill (R4).

The existing housing in Leabrook, Erindale, Kensington Park, Rosslyn Park and Magill has a fair mix of single and two storey housing which contributes to character and aesthetics of these suburbs. There is no valid reason to restrict the building height from existing 9.0 meters that permits two storey housing to 6.0 to 6.5 meters and only single storey housing.

Reducing the building height to 6.0/6.5 meters has a lot of negative consequences for the planning and design of Adelaide and promotion of sustainable urban development. Some of the negative consequences are:

1. Residents will be deprived of the choice of choosing single or two storey housing. That choice should not be taken away. Existing development has a good mix of single and two storey housing and that should be continued.
2. Single storey housing increases the building coverage/footprint that reduce open space. Reducing open space means reduced outdoor space for children play area and recreation that will promote urban heat islands, which is totally undesirable. It is totally undesirable for environment – less green cover, trees, open space and outdoor recreational area for families and children.
3. Adelaide has lost a lot of private open space and reduced building height will accelerate the loss of private open space.
4. The five suburbs affected by the change in building height from to 6.0 to 6.5 meters appears to be small island where as the rest of the Adelaide has the choice of maximum building height 9.0 meters and above.
5. A mix of single and two storey housing has promoted diversity and amenity and it should be retained and residents are not forced to build only single storey housing.

I humbly request changing the Maximum Building Height from 6.0/6.5 meters to 9.0 meters and permit maximum two storey housing in the area mentioned above.

Kindly acknowledge the receipt of this email.

Yours sincerely,

Sadasivam Karuppannan

[REDACTED]

Linden Park, SA 5065

Mobile: [REDACTED]

Email: [REDACTED]

From: [Sadasivam Karuppanan](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 (City of Burnside)
Date: Wednesday, 5 February 2020 2:25:33 PM

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 RPA21 of my Beaumont 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

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. 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

Sadasivam Karuppanan

[REDACTED]

Linden Park, SA 5065

Email: [REDACTED]