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To: [DPTI:Planning Reform Submissions](#)
Subject: submission to the Draft P&D Code for SA
Date: Friday, 28 February 2020 5:42:54 PM

Thank you for the opportunity to provide feedback on the Draft P&D Code. I have a couple of things I wish to comment on.

Communal Open Space – make it quality!

Quality of the open space, whether private or communal or public, is much more important than quantity.

In all medium-high density zones, including Housing Renewal areas, actively encourage developers to create green common open space of useable dimensions such that residents have opportunity to be sociable. I believe this could be applied for all style of medium-high density houses: row houses, terrace-style houses, group dwellings and residential flat buildings.

Shared space is well known to be beneficial for mental health of residents and creating resilient, connected, communities, provided the space is useable for relaxing e.g. soft landscaping partly shaded, pocket gardens with seating, mostly not paved.

As an example, for residential flat buildings I'm thinking of something along the lines of the Cooler Greener Design Site C for 16 dwellings, devised by CRC for Water Sensitive Cities.

Green, permeable, communal open space also has significant environmental benefits e.g.:

- increases the soakage area for rainwater, reducing load on stormwater systems
- communal space less likely to be paved over by residents in future, unlike Private Open Space
- more contiguous green space, better for cooling the air (less 'heat sink'), better for biodiversity and also perhaps creating green corridors

Examples of ways to encourage developers to create housing with shared green open space:

- in exchange for creating green communal open space there ought to be a reduced requirement for private open space per dwelling (on average at least).
- perhaps the Open Space Contribution fee could be waived? Or at least allow a sizeable reduction in that fee.

Delays in achieving Consent would absolutely discourage developers from creating this green, liveable community. Therefore is it possible to allow a development as described above to pass through the 'system' without undue delay? Can it somehow be treated in a fast-track manner, or at least as quickly as it would if they just paved the whole site (the horrible status quo)?

Housing Renewal Module

DTS/DPF 1.1 (e) and DTS/DPF 2.1 seem to contradict. Why are "residential flat buildings not exceeding 3 building levels" not allowed for in DTS/DPF 1.1 (e)? Or at least not exceeding 2 building levels?

DTS/DPF 10.2: a Studio cannot satisfy this factor as it stands, having no habitable room other than a bedroom. Can you make an exception for a Studio please?

DTS/DPF 12.1: 15% of site is too small to achieve sufficient greening to be useable, in my opinion, though quality of the area is much more important than quantity of the area. Please review this to ensure we do not miss an opportunity for creating social connections and changed behaviour – remember Housing First, it is not right that those living in social housing should have to look out on dreary, unusable common areas that add nothing beneficial to their life.

Ancillary Dwellings

Ancillary dwellings should be allowed to be built on any site that can fit one (allowing for open space requirements), and rentable to anyone, not restricted to use by relatives only. This could provide an important additional income for older people on larger blocks who do not want to move to an aged care facility.

Thank you again for the opportunity to provide feedback. I very much value your efforts in updating our cumbersome planning policy.

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Kind regards

Pam Keirns