

From: [Katriona Kinsella](#)
To: [DPTI:Planning Engagement](#)
Subject: Submission - Draft Planning and Design Code
Date: Monday, 2 March 2020 8:50:30 AM
Attachments: [Submission - Draft Planning and Design Code Phase Three - Katriona Kinsella.pdf](#)

To whom it concerns

If you will accept a late submission on feedback on the Draft Planning and Design Code Phase Three (Urban Areas), please find attached. For some reason I thought closed midnight Sunday, not midnight Friday which is of course my mistake.

Kind regards
Katriona Kinsella

Re: State Planning Reform - Draft Planning and Design Code Phase Three (Urban Areas)

To whom it concerns

Please find below my submission regarding feedback on the State Planning Reform – Draft Planning and Design Code Phase Three (Urban Areas).

1. Affordable Housing Layer

1a. If I am understanding the code correctly, the Affordable Housing Overlay current proposes that apartments built under this policy would at a minimum require '0' car parks and any other dwelling would require a minimum of 1 car park.

I find this clause unacceptable as it discriminates against those only eligible or able to afford to purchase affordable housing apartment options. The purpose of affordable housing is to provide people with an affordable entry point into the market and stable housing options. Having such a clause actually further disadvantages those only able to afford these housing options. They are also likely to have their place valued less than their neighbour who might have exactly the same apartment.

I cannot stress enough how outrageous and outrightly discriminative this '0' car parking proposal is in relation to affordable housing

I therefore refute the inclusion of:

Dwellings constituting affordable housing are provided with car parking in accordance with the following: (a) 0 carparks for an apartment; and (b) 1 carpark per dwelling for any other dwelling.

I advocate that the General offstreet parking requirements should apply the same as to all apartments, as they do to do the affordable housing overlay, as per the table below.

Table 1 – General Off-Street Car Parking Requirements

Class of Development	Car Parking Rate (unless varied by Table 3 onwards) Where a development comprises more than one development type, then the overall car parking rate will be taken to be the sum of the car parking rates for each development type.
Residential Development	
Group Dwelling	1 or 2 bedroom dwelling – 1 space per dwelling. 3 or more bedroom dwelling – 2 spaces per dwelling. 0.33 spaces per dwelling for visitor parking where development involves 3 or more dwellings.

I don't believe the general population would accept these conditions either as it is likely those purchasing affordable housing would own at least one vehicle and this would force vehicles onto the street. Parking in areas with medium density housing is already at a premium and this would further unnecessarily cause traffic and parking congestion.

In the General Off-Street Parking Requirements above, I support that the code should consider allocation of visitor parking for medium density apartments, to assist with on-street traffic and parking congestion. This also helps to incentivize medium density living.

1 b. For similar reasons above, based on discriminatory parameters for those only able to afford affordable housing options, I also do not support the policy that would allow for the decrease of minimum site areas of up to 20%. Again, affordable housing should not constitute a decrease on minimum standards and quality of living. I therefore refute the inclusion of:

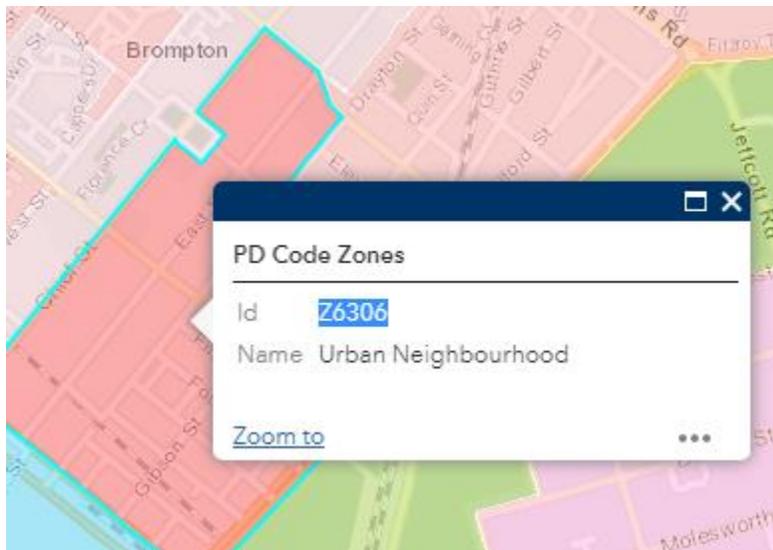
DTS/DPF 3.1 Where constituting affordable housing, the minimum site area specified for a dwelling can be reduced by up to 20%.

2. General Off-Street Car Parking Requirements and relationship with Active Transport in communities

Not all medium density housing is built close to adequate public transport. For the General Off-Street Car Parking Requirements to be successful, overly adequate walking, cycling and public transport infrastructure becomes even more important. Otherwise end up with clogged street, more difficult to navigate as people will park their additional cars on the street.

4. City of Charles Sturt - recent Bowden Brompton DPA

I compel the code to comply with the recent recommendations made to the relevant Minister from the City of Charles Sturt and further recommendations made from the Hon Pete Malinauskas MP to the zone described as 'Urban Neighbourhood ID Z6306' in Bowden Brompton as identified in the screen shot below.



The recent DPA had undergone over the last two years significant community and industry consultation. The current zoning does not comply with the conclusions met recently in this process and compromises willing to be made by the community in these circumstances.

For further details on the recommendations, I draw your attention to the following documents:

- **City of Charles Sturt - Final DPA report recommendations made to Council for progressing to Minister for Planning** www.charlessturt.sa.gov.au/_data/assets/pdf_file/0022/159205/cis19-02-18m.pdf
- **Parliament of South Australian - Environment, Resources and Development Committee - Meeting 15 October 2019 – Representation by Hon Peter Malinauskas MP:** www.parliament.sa.gov.au/en/Committees/Committees-Detail

In particular, I draw your attention to the lower housing heights and minimum setbacks suggested in both the above submissions as the area moves closer to Chief Street and Hawker Street that do not comply with the current blanket 'Urban Neighbourhood ID Z6306' zone that is proposed in the draft code.

Thank you for considering my submission.

Kind regards

Katriona Kinsella

A solid black rectangular redaction box covering the signature area.