

28 February 2020

REF No.: 00882-008

The Chair
State Planning Commission

Attention: Mr Michael Lennon

By Email: DPTI.PlanningReformSubmissions@sa.gov.au

Dear Mr Lennon,

Re: Submission - Draft Planning & Design Code (Phase 3 Urban Areas)

We write on behalf of our client, Reservoir Grazing Pty Ltd that owns three (3) large land parcels located to the east of Main South Road and north of Black Road, at Flagstaff Hill / O'Halloran Hill (refer **Figure 1** below).

The land parcels are formally described as follows:

- Lot 700 in Certificate of Title Volume 5922 Folio 249;
- Lot 508 in Certificate of Title Volume 5104 Folio 687; and
- Lot 801 in Certificate of Title Volume 6047 Folio 835.

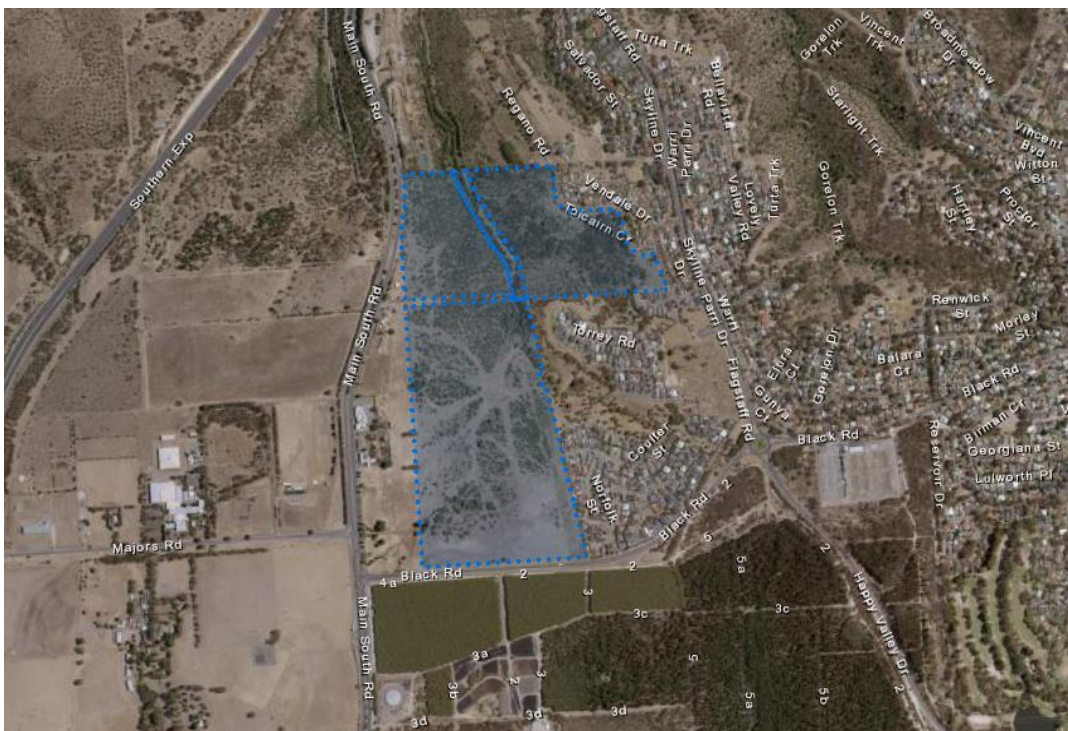


Figure 1 – Flagstaff Hill and O'Halloran Hill (Source: SAPPA)

Def: E-KIS-TICS [noun] : The Science of Human Settlements ...

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The sites are currently located within the **Hills Face Zone** of the Onkaparinga Council Development Plan (Consolidated 20 December 2018).

Under the Planning and Design Code ('the Code'), the sites are proposed to be similarly located within the **Hills Face Zone**. The sites are not located within a sub-zone.

The following Overlays apply to the site, or portions of the site:

- Airport Building Heights (Regulated) Overlay (30m)
- Hazards (Bushfire – High Risk) Overlay
- Local Heritage Place Overlay (applicable to particular areas of the site)
- Native Vegetation Overlay
- Prescribed Wells Area Overlay
- Regulated Trees Overlay
- Sloping Land Overlay (applicable to particular areas of the site)
- Traffic Generating Development Overlay (applicable to particular areas of the site)
- Major Urban Transport Route Overlay (applicable to particular areas of the site)
- Urban Transport Route Overlay (applicable to particular areas of the site)
- Water Resources Overlay (applicable to particular areas of the site)

The *Planning and Design Code Consultation Map Viewer* indicates there are no listed Technical and Numeric Variations applicable to the site (presumably consistent with its proposed zoning as Hills Face Zone).

Having reviewed the planning ordinance, proposed to apply under the Code, we note the following concern:

1. We note a Local Heritage Overlay applies to a large portion of the site, as illustrated in **Figure 2** over page. This Overlay should be removed from the site for the following reasons:
 - a. The site does not contain any Heritage Listed items;
 - b. Most of the spatial application of the Overlay appears to relate to a Heritage Item located on the opposite (western) side of Main South Road, which is well separated from the site; and
 - c. The Overlay extent is excessive and should not impact on any future assessment pathways for the site.

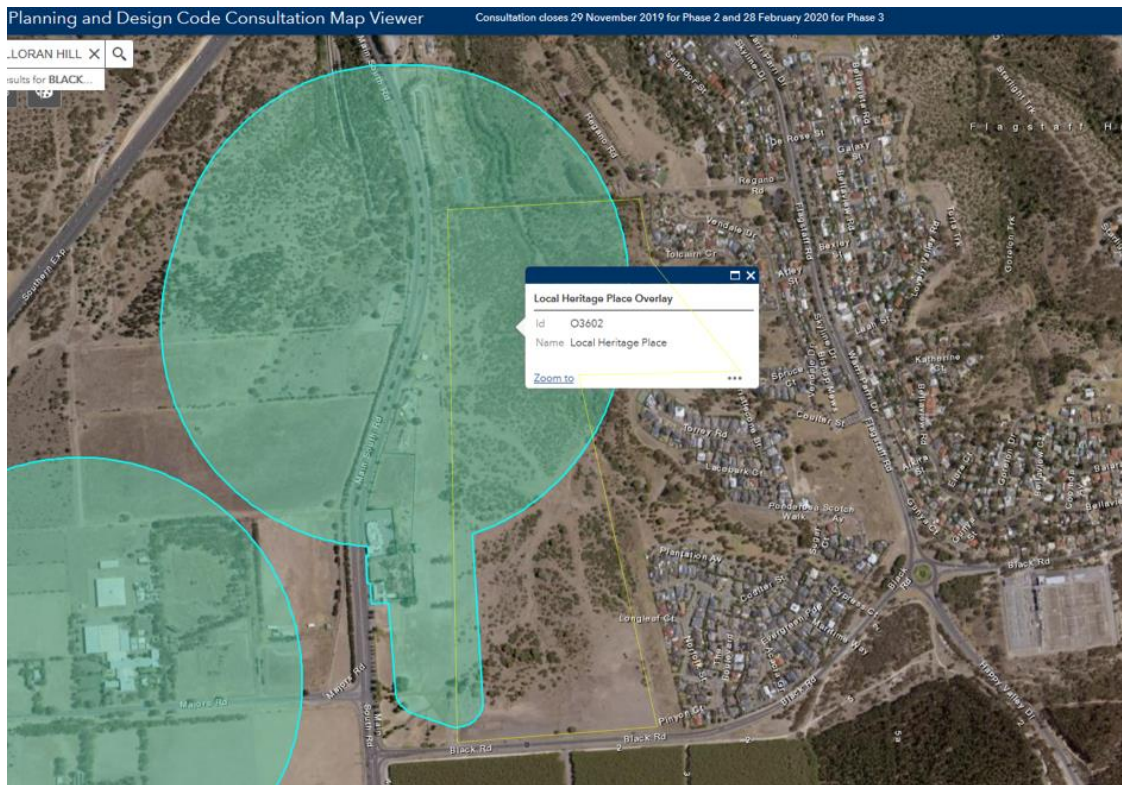


Figure 2 – Local Heritage Overlay Area (Source: P&D Code Consultation Map Viewer)

We thank the State Planning Commission for the opportunity to make this submission.

Yours Sincerely

Chris Carrey
Planning Consultant