

9 January 2020

Mr M Lennon
Chair State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Dear Michael

Draft Phase 3 Planning and Design Code

Stimson Consulting has been engaged by Trinity College Gawler to review the draft Phase 3 PD Code in relation to its potential impacts on the various school campus sites it has across northern Adelaide. There are various issues affecting the different campuses that I will address below.

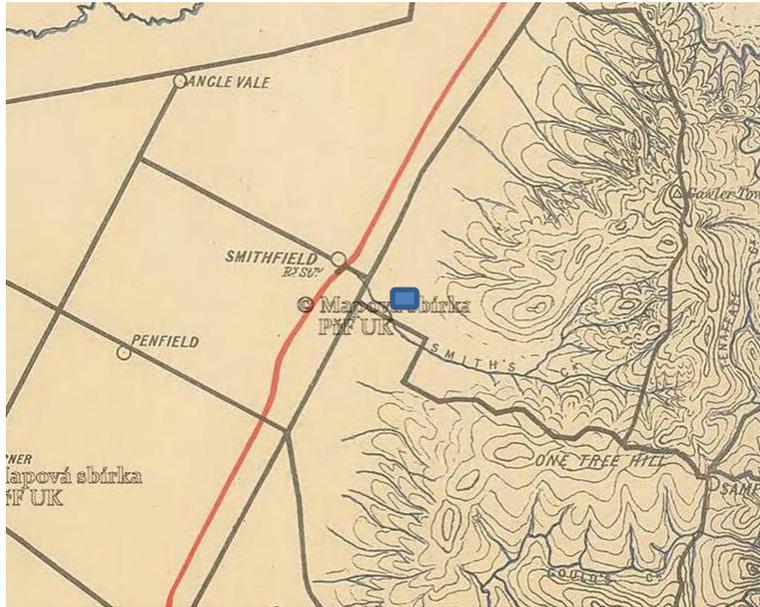
Blakeview Campus

The campus is located in the City of Playford within the current Residential Zone and is proposed to be transferred to the General Neighbourhood Zone in the PD Code.

The College has some concern with the spatial extent of the Water Resources Overlay which is shown below.



The Development Plan has for a number of decades had policy requiring buffers to rivers (eg: Little Para, Gawler) when development is proposed. It appears that the principle of that long held policy is now to be implemented across a wider range of creek types, including man made drainage lines. As can be seen from the **Surveyor General's** 1890 - 1910 topographic map on the following page there was never a creek of any type in this part of Blakeview. The Trinity College campus is shown on the map on the following page with the blue hatched area.



This drainage line that runs between the Trinity College Blakeview campus and the Blakeview Primary School was created in the 1980s - 90s when land divisions were approved and constructed between Main North Rd and Adams Rd. Prior to residential development occurring on the eastern side of Main North Rd there were very few defined creek lines as those creeks coming down the escarpment petered out and any stormwater spread out across the land.

The Water Resources Overlay DTS/DPF 1.5 requires a 20m buffer to the top of bank. There are already buildings on both sides of the drainage line that are well within 20m. **The Colleges' existing original tennis courts are some 5m from the top of bank (as shown on the aerial photo below in orange).** The College is proposing to redevelop these courts for a chapel in the future. It is considered the Overlay should not extend east of Park Lake Boulevard.



It is considered as a matter of principle that the Overlay should not cover man made drainage lines, especially where the surrounding land is developed (as opposed to non-urban land) and thus should be removed, particularly east of Park Lake Boulevard.

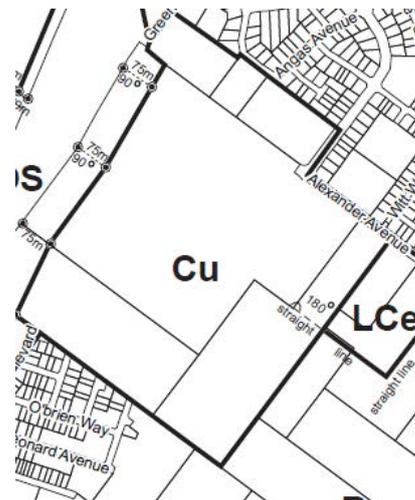


Main Campus

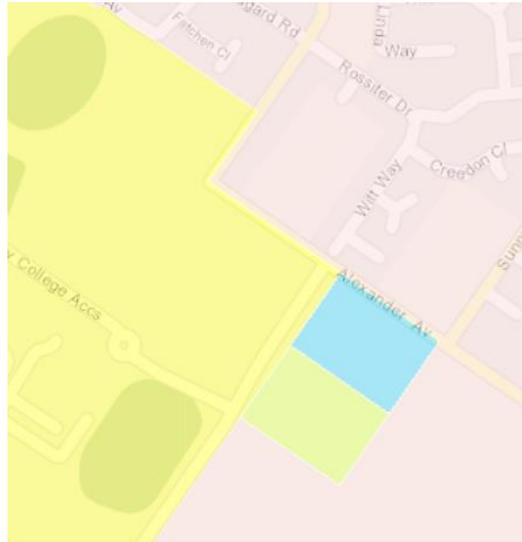
The campus is located at Evanston South in the Town of Gawler (see aerial photo below). In the Development Plan there are four zones that cover the land owned by the College (Open Space, Community, Residential and Local Centre). The draft PD Code transferred them to the Open Space, Community Facilities, General Neighbourhood and Suburban Activity Centre zones.



Lot 301 in DP 84303 is owned by the College and is located on the eastern side of the ring road – see orange outlined area on the aerial photo below. Also below is a portion of the Zone MapGa/8. The College acquired this land via a land swap with Renewal SA and has the aim of establishing student accommodation as part of a centre.



The boundary for the Local Centre Zone (PD Code - Suburban Activity Centre) has been shifted. The plan on the following page is the draft PD Code Zone map. There has been a shift of the southwestern zone boundary to reduce the centre zone. An area zoned Open Space has been introduced.



This proposed change in zone boundary is unacceptable to Trinity College as it significantly reduces the area zoned centre (PD Code - Suburban Activity Centre) that is owned by the College and it replaces the lost area with land that is zoned Open Space. This has a significant impact on the value of the parcel of land that is owned by the College.

Trinity College requests the State Planning Commission to reinstate the zone boundary location as per the Development Plan Map Ga/8, and include **"student accommodation"** in Table 3 and DTS / DPF 1.1 in the Suburban Activity Centre Zone.

The majority of the campus is located in the Community Zone (draft PD Code - Community Facilities Zone). Zone Tables 1, 2 and 3 do not have education establishment types of development listed. As such virtually anything the College proposes will be **considered to be "all other Code assessed development"**. Despite the zone being for education purposes the public notification process in Procedural Matters will mean all development that occurs on the campus (which is 44ha in size) will be publicly notified. There are many minor types of development (eg playgrounds, shelters) that have no impact on adjoining land **that have been and are likely to be built that can't be seen** from public land or adjoining parcels of land, yet future development applications will need to go on public notification. This does not seem to be in keeping with the aims of the planning reforms. It will cost the College time and money and will add to the burden of planning authorities.

It is requested that "education establishment" (as defined in Part 7) is added to Table 3 in the Community Facilities Zone with links to appropriate General Policies.

Should you have any queries regarding the above please do not hesitate to contact the undersigned or Stephen Rosier – Business Manager at Trinity College Gawler on [REDACTED]

Yours sincerely
STIMSON CONSULTING PTY LTD

JOHN STIMSON
Managing Director

Cc: S Rosier – Trinity College Gawler