

From: [Jill Woodlands](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Re: Planning and Design Code for Urban Areas Comments
Date: Friday, 28 February 2020 4:41:35 PM

SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3

This is a generational opportunity for the Government to get the Planning and Design code (Phase 3) right. To ensure Adelaide is resilient to the ongoing effects of climate change.

The draft does not allay my concerns – although it and supporting policies contain many references to measures which would enable such adaptation to occur (e.g a reference to a target of 20% increase in urban green cover by 2045) I am not at all convinced how, in practice, this target will be achieved. I am most concerned that any new developments need only achieve minimum standards so that that Adelaide’s green cover will decrease not increase.

I note that Water Sensitive SA has outlined a range of alternative models for larger developments in which much greater green space could be provided while not sacrificing the number of dwellings on the block. Essentially, this could be done by placing car parking space under dwellings and designing the remaining space thoughtfully - providing common green space as well as private green space, and providing for the bulk of storm water to remain on the property rather than be discharged to the street.

I would encourage the proposals by Water Sensitive SA to be seriously considered as well as **setting mandatory targets for all new developments** as follows:

- at least 30% vegetated
- a further 20%, at least, permeable

A summary of my other comments below

1. General Neighbourhood Zone and Housing Diversity Zone:

The draft Code places some areas in the General Neighbourhood Zone and the Housing Diversity Zone. The policy in these new zones is at odds with current zone policy and allows for a greater intensity of development than existing. The current zones focus on preserving character rather than accommodating change and infill and do not envisage a greater range and intensity of development than currently exists. 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 our council’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, neighbours and prospective buyers. Existing

protections and identification of Contributory Items should be maintained.

The proposed demolition control wording is much weaker than what currently exists in Historic Conservation Zones. I request that the Code adopts the wording in the previous SA Planning Policy Library, and does not place inappropriate emphasis on front elevations, visibility of building facades and economic viability.

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 our council'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. Impact on Infrastructure and Essential Services

The potential rate and intensity of new development, which will be facilitated through the proposed Code policies, could place existing local infrastructure, especially roads and stormwater systems, under stress, particularly in our older established areas.

7. Tree Canopy and Climate Resilience

The 30-Year Plan for Greater Adelaide calls for an increase in tree canopy cover, however, the draft Code works directly against this by enabling larger developments and the increased 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.

I feel that unless the above issues are addressed 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

Jill Woodlands

Payneham