

From: [PLEG](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Kristina Barnett- Submission URBAN GREEN COVER AND WATER SENSITIVE URBAN DESIGN POLICIES WITHIN THE PLANNING AND DESIGN CODE - PHASE 3
Date: Friday, 28 February 2020 1:54:37 AM
Attachments: [Planning code submission urban green cover water sensitive design Feb 2020.docx](#)

Department of Planning, Transport and Infrastructure

GPO Box 1815 /Adelaide SA 5001

Email DPTI.PlanningReformSubmissions@sa.gov.au

February 2020

Please accept my submission as attached for the PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON THE URBAN GREEN COVER AND WATER SENSITIVE URBAN DESIGN POLICIES WITHIN THE PLANNING AND DESIGN CODE - PHASE 3.

Thank you for the opportunity to comment.

Regards

Kristina Barnett

Management Committee member

Prospect Local Environment group Inc.

--

Kristina Barnett
Management Committee member



Prospect Local Environment Group Inc (PLEG)

'Local Energy, Local Food, Local Recycling, Local Transport'

Prospect SA 5082

[Email:](#)

[Web:](#)

[Facebook:](#)

[Prospect Eco Market Facebook:](#)

Warning - This email message is intended only for the addressee(s) and may contain information that is confidential, subject to legal or other professional privilege, or protected by copyright. If you have received this in error, please notify the sender by reply email and delete this email from your system. (You are not permitted to use, reproduce or disclose the contents of this email if you aren't the intended receiver). No representation is made that this email is free of viruses. Virus scanning is recommended and is the sole responsibility of the recipient. To unsubscribe, contact [REDACTED] and write Unsubscribe in the subject box. Thank you.

February 2020

SUBMISSION TO PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON THE URBAN GREEN COVER AND WATER SENSITIVE URBAN DESIGN POLICIES WITHIN THE PLANNING AND DESIGN CODE - PHASE 3

As a member of Prospect Local Environment Group Inc and resident of the City of Prospect, I support the following to be included the Planning and Design Code Phrase 3 (the Code):

1. The need for guidelines to be developed to support development applicants to maximise the impact and benefit of their development, including:
 - New housing typologies that deliver more green space and additional permeability of traditional hard surfaces.
 - Innovative ways to achieve rainwater storage while not occupying valuable outdoor space, e.g. rainwater tanks as fences, internal walls and under deck tanks
 - Appropriate position, species, function and care of vegetation/trees, particularly to achieve microclimate benefits and identify those that can survive under a future warmer climate, and ways to keep water to these plants through WSUD.
 - The use of structural soil products as a way to achieve deep soil zones in more confined spaces.
 - How to enhance biodiversity in new developments.

The guidelines must either sit on the DPTI website on a “Guidelines for Applicants” page or must have clear links to the website of other government or not-for-profit organisations that have this information.

2. The need for designs that replace the central impervious driveway with a pedestrian only green spine. To achieve this, car parking spaces needed to be decoupled from the housing/lots via a communal undercroft car park. Designs that can achieve this offer a mix of Torrens title townhouses and apartments over the common undercroft car park. A central communal green space would provide:
 - Higher quality green space and greater proportion of deep soils zones
 - Sufficient space for children to play
 - High amenity
 - Support for mental wellbeing
 - Cooling breezes to reduce reliance on air conditioners.
 - Community connection.
3. The need for incentives to provide a greater proportion of communal open space on private land that could be achieved by:
 - Reducing contributions to the open space fund.
 - Land tax laws amended to only tax the impervious portion of the site. [Revenue SA could manage the implementation of Land Tax to be cost neutral overall on the revenue collected, in supporting a percentage discount based on the area dedicated towards trees and gardens (not lawns). Those properties that have been transitioned to multi dwellings with near zero trees and gardens are using more of the land and should therefore pay more. Rooftop gardens and green walls could potentially be included at a reduced discount). (Landscaping: PO 21.1 and DTS / DPF 21.1)
4. Need a DTS solution/guidelines for policy PO 11.1 or PO21.1 that provides details on where the green space is provided for maximum microclimate benefit to the household. (Environmental: PO 11.1 or PO21.1)
4. Ban black/dark roofs due to the urban heat profile. (Environmental: PO 11.1 and DTS 11.1)
5. Need increased rainwater harvesting and use through larger rainwater tanks. (Environmental: PO 11.2 and DTS 11.2)
6. Permeable paving is supported as an excellent way to increase soakage of water into local soils to sustain plants and reduce run-off, however it should not be permitted as a predominant feature of soft landscaped areas. Need more use of pervious materials (e.g. porous asphalt or permeable paving) for driveways and car-parks that are traditionally constructed of impervious materials. (Landscaping: PO 21.1 and DTS / DPF 21.1)

8. Need description of what “soft landscaping” should include and what is unacceptable. We need increased grass, shrubs and other vegetation in these spaces compared with business as usual. It cannot just have gravel with a few minor plants as occurs now. (Landscaping: PO 21.1 and DTS / DPF 21.1)
9. Inclusion of policy for minimum tree planting with a focus on canopy cover (mature spread) provided by larger trees rather than the number of trees. (Landscaping: PO 21.2 and DTS / DPF 21.1)
10. Modelling should be required at the lot scale to determine the urban heat profile of a proposed new development, similar to models for overshadowing and solar access. (Landscaping: PO 21.2 and DTS / DPF 21.1)
11. Need policy incentives for other water conservation measures not just rainwater re-use, such as reuse of grey-water. (Landscaping: PO 21.2 and DTS / DPF 21.1)
12. With increase in hard paved surfaces as a result of urban infill and the associated increased frequency of flood events in local suburbs, need policy that ensures new development should not contribute to local flooding. (All development: PO 22.3 and DTS 22.3)
13. Vehicle access: need policy to protect health and viability of street trees (protection of street trees deemed to be equally important as protection of trees on private land). (All development: PO 23.3 and DTS/DPF 23.3)

Yours Sincerely

Name: Kristina Barnett

Address: [REDACTED] Prospect 5082

From: Kristina Barnett
Sent: Friday, 28 February 2020 4:37 AM
To: DPTI:Planning Reform Submissions
Subject: Submission to PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON THE PLANNING AND DESIGN CODE Phase 3
Attachments: KBarnett Planning Code submission supporting Prospect Council submission Feb 2020.docx

Please accept my submission as attached for the PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON THE PLANNING AND DESIGN CODE - PHASE 3 supporting the City of Prospect submission

Thank you for the opportunity to comment.

Regards

Kristina Barnett

--

Kristina Barnett

Phone: [REDACTED]

Email: [REDACTED]

Twitter: [REDACTED]

Facebook: [REDACTED]

Warning - This email message is intended only for the addressee(s) and may contain information that is confidential, subject to legal or other professional privilege, or protected by copyright. If you have received this in error, please notify the sender by reply email and delete this email from your system. You are not permitted to use, reproduce or disclose the contents of this email. No representation is made that this email is free of viruses. Virus scanning is recommended and is the sole responsibility of the recipient. Thank you.

SUBMISSION TO PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON PLANNING AND DESIGN CODE - PHASE 3 CITY OF PROSPECT

As a resident of the City of Prospect and an individual member of Prospect Resident's Association Inc, I wish to register my support for the City of Prospect submission as follows:

1. The existing Residential Zone needs be incorporated into the proposed Suburban Neighbourhood Zone (Policy Areas 560, 450 & 350) and the Housing Diversity Neighbourhood Zone (Policy Area 200). The existing 560, 450 & 350 policy areas are all proposed to be subject to a Character Areas Overlay. This is seen as a positive outcome and works well with the Prospect Council's desire to preserve and enhance the character of the suburban streets across the city.
2. The existing Historic Conservation Zones within the Prospect (City) Development Plan are also proposed to be incorporated into the Suburban Neighbourhood Zone, subject to Historic Area Overlays. We agree with the intent of the Suburban Neighbourhood Zone expressed in its Desired Outcome (DO) outlined below:
 - Low or very low-density housing that is consistent with the existing local context and development pattern.
 - Services and community facilities will contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character.
3. We support a number of key performance outcomes that will be used to assess relevant development applications from the Suburban Neighbourhood Zone (which covers much of the Prospect Council area) as outlined below:
 - PO 1.1 Residential development and supporting uses that provide housing and supporting services and facilities that preserve a low density residential character;
 - PO 1.2 Dwellings complement the low-density or very-low density character of the neighbourhood.
 - PO 1.3 Shops, consulting rooms and offices of a scale to maintain the amenity of nearby residents.
 - PO 2.1 Allotments/sites created for residential purposes are of suitable size and dimension and are compatible with the housing pattern consistent to the locality.
 - PO 3.1 Building footprints consistent with the character and pattern of a low-density suburban neighbourhood and provide sufficient space around buildings to limit visual impact, provide an attractive outlook and access to light and ventilation;
 - PO 4.1 Buildings contribute to a low-rise suburban character and complement the height of nearby building;
 - PO 5.1 Buildings are setback from primary street boundaries to complement the existing suburban streetscape character;
 - PO 7.1 Boundary walls are limited in height and length to manage impacts on adjoining properties.
4. It is of great concern that Prospect Council's detailed Historic Area and Character Area Statements provided to the Department are not included in the Code. We ask that the Department/Planning Commission includes the previously prepared character statements submitted by Prospect Council as they give considerably more direction to land-owners/residents/developers regarding residential character and they should be incorporated into the Code.
5. Despite being named a Planning and 'Design' Code, the draft Code does not have a sufficient focus on design based policy or outcomes. This is an issue that City of Prospect and its residents in consultation have previously expressed on a number of occasions and is being raised again in this submission.
6. We do not support any type of development that impacts on the public realm e.g. new dwellings, dwelling additions to the side or front of an existing dwelling, carports or garages visible from the street as being 'deemed to satisfy' development within the Suburban Neighbourhood Zone.

7. The new planning system must include sufficient opportunities for local government and local communities to develop planning policy for local areas. There is a loss of local policy and local content in the draft Planning and Design Code in the interests of standardization of planning policy. A 'one size plan' does not fit all council areas.
8. We support design examples to be incorporated as an important element of the Planning and Design Code to assist designers, planners and community to design and assess future development. Use of appropriate language and examples will assist in ensuring that all stakeholders can understand and use the Code. This has not been delivered as part of the draft Code.
9. Our Prospect Community expects existing character to be maintained with sensitive infill being acceptable where suitable design and streetscape integration are demonstrated, and that the Code must address the retention of local residential character balanced with sensitive and appropriate infill development. The simplistic nature of the Character Area Statements that do not contain sufficient contextual information to support the basic, numerical based planning policy in the zone and overlays.
10. The dwelling styles within Inner Metropolitan Adelaide are distinctive in consistency and character in many areas and we consider that this must be recognized and addressed in the Planning and Design Code. Generally our Community will expect existing character to be maintained with sensitive infill acceptable where suitable design and streetscape integration are demonstrated, this must be recognized in the Planning and Development Code. The Code policy does not address the retention of local residential character balanced with sensitive and appropriate infill development to a sufficient level of detail.
11. It is critical that the Planning and Design Code is written and structured so that the community can clearly understand exactly what they are able to develop on their land and also what their neighbours and land developers are able to develop within the locality. The consultation on the draft Code using a mapping tool focused on a site specific search function, lack of council wide maps outlining zoning and overlays, a paper-based draft Code of some 3000 pages (rather than the e-planning platform) and the lack of a single source of information for what can occur on each parcel of land does not make the new policy easy to understand for the community.
12. We support Prospect Council with feedback from its community with Historic Conservation Zones and Policy Areas and Contributory Items being directly transitioned from the Prospect (City) Development Plans into the new Planning and Design Code. This has not occurred in the draft Code, leading to Council needing to undertake additional work and significant expense to attempt to address this matter. Overlay Local Heritage: 'Contributory Items', particularly mapping of their location, should be carried forward from Development Plans to the Planning and Design Code.
13. In the Suburban Neighbourhood – Low Density Zone, we do not support:
 - An intended approach that allows development that impacts on streetscape and local character to be deemed to satisfy.
 - An intensification of commercial activities in low density residential areas with proposed DTS 1.3 Consulting Rooms [+ shop + office] up to 100m², and 200m² along major roads or adjacent Main Street or Activity Centre Zones, in residential areas.
14. The introduction of the Code represents an opportunity to include flood mapping data already held by the State Government into the Planning and Design Code prior to its commencement. Using data already available makes sense and could save ratepayers money.
15. Further consultation is required and date for the current consultation needs to be extended.
16. I would like further community consultation once the Code's errors have been corrected and the draft updated.

Yours Sincerely

Name: Kristina Barnett

Address: [REDACTED] Prospect 5082

February 2020

SUBMISSION TO PUBLIC CONSULTATION ON PLANNING AND DESIGN CODE - PHASE 3

As an individual member of Prospect Local History Group and resident of Prospect Council for over 46 years, I strongly support the following matters to be considered:

1. State heritage provisions for areas and places being 'carried over' into the Code.
2. Referral to the Minister responsible for the state heritage legislation should clearly identify any delegations involved in the process of assessing development proposals.
3. Detailed heritage guidelines should be provided to councils processing minor development applications under delegation from the Minister of Environment and Water.
4. Provision of state based heritage skills training and conservation courses available through the Construction Industry Training Board (CITB) should be encouraged as part of ongoing practical and technical training for tradespeople, architects, planners, and development assessors.
5. Accredited professionals providing private assessment services for heritage related applications should be members of Australia ICOMOS standard for heritage conservation and management practice. An accreditation system should be established as part of planning reform review.
6. Historic Area Statements (issued on the 23rd December 2019) are integral to identification of all related heritage but need to identify current existing contributory buildings in line with recognition of the distinct and important historic characteristics of individual areas. The Historic Area Statements are deficient as follows:
 - Template approach lacks key aspects of historic patterns and characteristics (context of history and evolution of the heritage area).
 - Existing building siting criteria (road setback, side boundary and total building spacing has been replaced by minimal generic setbacks criteria in the Code).
 - Historic Area Overlay policy lacks guidance on improvement that respect buildings and does not provide reasonable demolition protection.
 - Historic character includes original whole building, setting and context (not just the building façade).
7. Contributory Items (approximately 12,000 contributory items across Adelaide, representing 3% of total housing stock in metropolitan Adelaide) need to be recognised as desirable assets that can be adapted to the modern day living/ commercial use as well as a highly desirable part of our state's heritage resource. The Planning Commission needs to prioritise protection of these important elements of past and present environments and protect them from demolition and unsympathetic replacement development. Heritage is an irreplaceable resource if demolished by those who profit from higher density development.
8. I support the submission by Vines & McDougall including:
 - 8.1 Contributory places need to be in a clearly identified database (e.g. spatially identified on a map showing the newly termed Historic Areas boundaries or by address) with carry over policies and content to provide clear guides for future development of heritage assets. Local and state heritage places within the Character Overlay must be identified and referred to in mapping.

- 8.2 The draft Historic Area Statements should be completely redrafted, edited and rewritten by experienced heritage consultants to expand the content, incorporate necessary additional information, and provide a statement to guide appropriate development in these significant historic areas. In their current form, development could be approved which would destroy the historic values of a Historic Area Overlay.
9. I support the removal by the Planning Commission of the current legal requirement of 51% approval by all land owners in an area proposed for heritage zoning (and/or overlay).
10. Recognising that adjacency situations vary considerably in different areas of our state, I support recommendations that council planners and heritage architects assist DPTI in formulating heritage adjacency content draft policies that will clarify desired outcomes and DTS provisions. Local councils should continue to have a main role in planning and management of Character Areas, local heritage places and Historic Areas using local knowledge and expertise. Local councils should not have extra constraints and expense place on them by the State Government and its instrument, the Planning Commission.
11. Character Overlay Assessment Provisions (relating to streetscape amenity and development that complements a defined streetscape character) need to be strengthened so that new development demonstrates any prevailing characteristics of the area. Public notification should be included under Procedural Matters to enable better assessment outcomes.
12. Demolition of well-built homes of traditional architecture, together with all its vegetation, needs to be stopped from becoming the norm. The dwelling styles within Inner Metropolitan Adelaide are distinctive at a national and international level in consistency and character in many areas. This must be recognized and addressed in the Planning and Design Code. Generally our communities of the inner and middle ring suburbs within 10 kilometres of the CBD expect existing character to be maintained with sensitive infill acceptable where suitable design and streetscape integration are demonstrated. This must be recognized in the Planning and Development Code. The Code policy does not address the retention of local residential character balanced with sensitive and appropriate infill development to a sufficient level of detail.
13. I support Prospect Council (backed by feedback from its community) with its Historic Conservation Zones and Policy Areas and Contributory Items being directly transitioned from the Prospect (City) Development Plans into the new Planning and Design Code. Council has had to undertake additional work and significant expense to attempt to address this matter. Overlay Local Heritage: 'Contributory Items', particularly mapping of their location, should be carried forward from Development Plans to the Planning and Design Code.
14. National Heritage Places such as the Adelaide Park Lands and City Layout should be identified in South Australia's planning system and heritage data bases.
15. Further consultation is required and date for the current consultation needs to be extended.
16. I would like further community consultation once the Code's errors have been corrected and the draft updated.

Yours Sincerely

Name: Kristina Barnett

Address: [REDACTED] Prospect 5082