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**From:** John Rockliff  
**Sent:** Friday, 28 February 2020 3:38 AM  
**To:** DPTI:Planning Reform Submissions  
**Subject:** SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 (City of Burnside)  
**Attachments:** JRockliff\_Planning\_Submission\_Letter\_\_Beaumont\_Ward.pdf

I'm writing this email to submit feedback to the proposed Planning and Design Code update. Please find attached a file

JRockliff\_Planning\_Submission\_Letter\_\_Beaumont\_Ward.pdf  
with my detailed comments: I trust you will take them into consideration.

John Rockliff

 Linden Park, SA 5065

28 Feb 2020

State Planning Commission

By email: [DPTI.PlanningReformSubmissions@sa.gov.au](mailto:DPTI.PlanningReformSubmissions@sa.gov.au)

To Whom it May Concern

### **SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 (City of Burnside) – John Rockliff**

In response to the draft Planning and Design Code – Phase 3, which is currently out for public consultation, I wish to register my strong objections to a number of issues as summarised below.

#### **1. General Neighbourhood Zone**

The draft Code places my residential area, RPA21 of Beaumont Ward in the City of Burnside, in the proposed General Neighbourhood Zone. The policy in this proposed new zone allows for a far greater intensity of development than existing.

The current zone regulations already accommodate change and infill, albeit moderated by council oversight and regulation: for example in my street there are already 8 of the original 18 full size blocks which have been subdivided to host multiple dwellings, with another block recently sold to developers, also earmarked for demolition and subdivision. To allow even smaller block sizes in this zone, of the sizes posited in the draft code, would allow developers to subdivide existing house blocks into 3 or 4 dwellings, significantly increasing the density of housing in the area over the currently allowed limits. This has the potential to greatly exacerbate numerous deleterious effects:

- Increased local vehicle traffic with its attendant noise, pollution, and decrease in safety for children and other pedestrians and bike riders in the zone
- Increased parking congestion, arising from greater numbers of residents, with less off-street parking on their own residences, coupled with decreased street frontage due to extra crossovers. Aside from the general loss of amenity from the crowding of the streets, this will make access for larger vehicles very difficult – we already see rubbish trucks blocked from time to time, and emergency services vehicles and delivery vehicles have to run the same gauntlet. At the moment this is an occasional nuisance but significantly increasing the use of roadside parking for resident vehicles (not to mention business customer vehicles under the relaxed proposals for site usage) will escalate this problem in frequency and severity
- Existing utilities infrastructure (electricity supply, gas supply, water supply, stormwater, sewage, and NBN) is already being taxed by the current level of in-fill, and facilitating infill density increase up to double the current maximum will without doubt reduce the reliability of utilities in the local area, and force expensive re-provisioning and capacity upgrades. (And of course any works for this upgrading will in turn add to the traffic congestion, noise and general loss of amenity in the area!)
- Schools in the area are already at capacity, with instances already noted of zone residents being forced to seek enrollment in schools in adjacent zones: increased density of more affordable higher density housing will attract younger families, leading to even greater pressure on the schools.
- The decreased block sizes and decreased available uncommitted street frontage will significantly decrease the tree population both on blocks and on the road verges in the zone, with significant loss of shading accelerating the localised solar heating and heat retention. With that comes attendant knock-on effects such as accelerated aging of road infrastructure due to heat-softening of the tarmac, and increased reliance on air conditioning to keep houses comfortable, causing and accelerated demand on the electricity generation and distribution infrastructure.
- That same loss of tree canopy will also catastrophically reduce the habitat for birds and animals in the area, which will further decrease the amenity of the area. At the moment it is not uncommon for the occasional koala to be spotted in the street trees, while there are significant numbers of various varieties of birds resident in the area – it would be a great loss to see those populations decline and be pushed out of the area.

The singling out of Beaumont Ward for transfer to the General Neighbourhood Zone, while all other adjacent areas remain at Suburban Neighbourhood Zone, will encourage developers to focus on this zone for high density “affordable” housing (I say encourage, but in reality, they will have little option, given the paucity of other areas so zoned in the inner east), rapidly turning this zone from a medium/low density family environment into an undesirable crowded slum of low quality housing stock in congested noisy streets.

Residents who have moved into this zone prior to the rezoning, will see their financial investment in their housing asset, and their emotional and time investments in a community and lifestyle, eroded by the entirely predictable rush by developers to turn a quick profit by subdividing and shoe-horning in as many low-cost dwellings as possible, and the consequent uptake of those low-cost dwellings by people unlikely to have a long-term attachment to the area. Many of these new residents either will view these “affordable” dwellings as the first transient step on their journey to a more traditionally sized “forever home”, or they will be rental tenants of landlords attracted by the lower capital values (and hence potential for better investment return) of these smaller dwellings. I certainly did not move to this area to spend my retirement years in a crowded busy noisy dormitory slum: I chose a suburb with good amenities and character which had strong Council protections on the sort of allowable developments which would guarantee sustained amenity while still allowing scope for modest levels of infill and change. By unilaterally over-riding the existing development conditions and regulations applicable to my area the Government derives benefit by being able to pursue its policy agenda, but it is causing me (and all other residents) economic loss and loss of amenity, yet we seem to be expected to accept these losses without any compensation.

This degradation of the suburb will be greatly accelerated by the loss of oversight and control by the local Council planning department. If effective local control were maintained then perhaps some solutions, remedies or damage-limitation to the above-mentioned deleterious effects could be enforced through local council conditions, but a major thrust of this planning reform seems to be to minimise any scope for local variations or regulations in the General Neighbourhood Zone, which in practice will mean that developers will be able to shove through lowest-common-denominator cheap thoughtless development which does not address any of the side-effects, with no recourse from adjacent residents or their council. The end result will be an unchecked and unstoppable race to the bottom.

I demand that you move all residential areas to the Suburban Neighbourhood Zone with TNVs to match existing conditions. Specifically, I want Linden Park/Beaumont Ward zoned Suburban Neighbourhood Zone and not treated as a lesser area than its neighbouring suburbs.

Further to my above concerns specifically related to the block sizing allowable under General Neighbourhood Zones, in community discussions around these proposed changes to planning a number of other points were raised, with which I am in agreement, as follows.

## 2. All Existing Residential Areas

- a) Non-Residential land use: Currently in the City of Burnside’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. It is unacceptable that non-residential uses be allowed to proceed without consultation with, and feedback from, affected community. **All uses which are currently non-complying in our residential areas (eg. office and shop) should be “restricted development” and Council should retain the right to veto, or demand significant changes to the development to minimize or remove harmful consequences.**
- b) Density and Allotment Sizes: It is important that current minimum allotment sizes, heights and frontage widths match existing. Council should still have oversight and power to modify approvals or veto

## 3. 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. **It seems inappropriate that the centres are proposed to be treated without regard to scale.**

## 4. Public Notification

The Code should reflect the City of Burnside’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. AGREE**

## 5. Tree Canopy and Climate Resilience

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

Yours sincerely

John Rockliff

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28 February 2020