

Torrensville SA 5031

ATTENTION: State Planning Commission

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

To Whom it May Concern

SUBMISSION ON PLANNING & DESIGN CODE

I wish to respond to the draft Planning and Design Code which is currently out for public consultation. I must register my very strong objections to a number of issues, summarised below.

The Code contains many policy provisions and implications that have the potential to be hugely detrimental to the character and amenity of both urban areas and historic and rural SA communities and townships. It threatens the rights and responsibilities of Councils, communities and individuals to influence their lived environment.

I am deeply concerned that this Code is being introduced with undue haste and the public consultation period is not sufficient for full discussion. The e-Planning portal is not complete, so does not allow public access to much of the information that is critical to the plan. This is a major concern given the implementation of the Code is totally dependent on this electronic tool.

Further, I am aware that three of the four members of the State Planning Commission are developers and do business in SA. This represents a conflict of interest and the transparency of the Commission's actions are brought into questions. This is unacceptable.

1. All Existing Residential Areas

- a) Non-Residential land use: In the new Code, existing residential areas will allow non-residential uses, which will adversely impact traffic, parking, noise, neighbour amenity and the character of our suburbs. This is totally unacceptable. All uses which are currently non-complying in our residential areas (e.g. office and shop) should be "restricted development". Alternatively, a new zone should be created purely for residential land use.

I support the following

- Request that research and investigations undertaken on the impacts of non-residential land uses in the proposed Neighbourhood Zone is likely to have on existing retail, office and business be undertaken and released.
- Appropriate policy testing prior to the Planning and Design Code going live to ensure unintended consequences are identified and rectified during an appropriate testing phase

- 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.

I support the following

- That zoning in the Code reflects the current West Torrens Development Plan
- The draft Planning and Design Code be amended to respect the characteristics and identities of different neighbourhoods, suburbs and precincts by ensuring that development policy considers existing and desired future context of place.

2. 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, prospective buyers, neighbours and developers. Existing protections and identification of Contributory Items should be maintained.

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. 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.

4. Public Notification

The apparent abolition of the current requirement to notify impacted residents of prospective developments is unconscionable. 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.

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, with 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 cross-overs. It has been proven that fewer suburban trees translates directly to hotter street temperatures.

Zoning policy changes for national and conservation parks and wild life reserves blur the boundaries between conservation areas and pastoral and other zones. Whatever else we look to in the future it must be the preservation of our parks and natural environment.

I support the City of West Torrens' recommendations: -

- Additional conditions be included to all new residential development to ensure the planting and ongoing care of these trees is supported and enforceable.
- Additional conditions be included to protect these trees from future removal without replacement.
- A minimum of one tree per four carparks be included as the minimum for carparks which are open to the sky
- Retain the hierarchy between Regulated and Significant Trees with the latter having greater protection.
- Include additional policy in line with Council's current Development Plan policy.

6. Parking

New multi-storey and infill developments will be under-resourced for on-site parking. There is ample evidence of this already with narrow streets cluttered with overflow off-site parking, causing problems with neighbourhood congestion, traffic flows and dangerous inhibition of emergency vehicle access.

The current Liberal Government was opposed to John Rau's PDI Act when in Opposition. Since gaining office, what has changed to reverse that position, for the Government to now be so enthusiastically supportive of this destructive plan that destroys heritage, character and amenity in our enviable city and State. It appears that sustainability, biodiversity, open space, greening and climate change have received little attention in this draft Code, despite these being recognised as issues of utmost importance facing our community and our times.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns, there will be an unacceptable loss of local character and amenity in my and other neighbourhoods. I submit the draft Planning and Design Code is not fit for purpose and contains unacceptable provisions for built and natural heritage. It must be substantially deferred, repaired, re-constructed and submitted to a proper and inclusive community consultation process.

I request that the draft Planning and Design Code not be formalised until:

- The State Planning Commission has engaged and formally responded to councils, addressing errors, omissions and inconsistencies identified during the current consultation process.
- The State Planning Commission has undertaken a second round of public consultation on the draft Planning and Design Code, which has been incorporated within the ePlanning system.

I trust that the concerns detailed above will be given your full consideration.

Yours sincerely



Carolyn Saunders
Resident, Torrensville