

To whom it may concern

I am writing in response to the consultation on the planning and design code phase 3 outlining my concerns with the process and the proposed changes to the code itself.

I currently live on Lurline Street within West Torrens Residential Zone, specifically Cowandilla/Mile End Character Area 23.

I am extremely concerned that if the proposed changes proceed for my area as a 'Housing Diversity Neighbourhood Zone', the amenity and character of this beautiful, historic suburb and its close community will be destroyed.

Process

I appreciate that planning is a very complex policy area crossing individual, local, state and federal arrangements; there are also wide ranging views of stakeholders and interest groups. However, this process of community engagement and providing the community information on the proposed changes has been extremely distressing for me, my family and the broader community as it impacts how we live, work and play. The planning reforms being consulted on will guide the liveability of our suburb and what is being proposed for our area will be a significant change.

The draft code is complex and difficult for lay people to navigate. The materials produced in support of the draft code are not produced in plain English, there has been no provision of information that provides a clear rationale for why this area is being treated the way it is. Therefore, there has been no opportunity for meaningful community participation for such a significant change. The reasons for the proposed change to move to a zone that is not 'like for like' in my area have been absent, contradictory or non-existent. As such, the requirements in the Community Engagement Charter and section 44 of the *Planning, Development and Infrastructure Act 2016 (SA)* have clearly not been complied with.

With such significant and complex changes, it is difficult to understand what the rush to seek and close consultation on this significant change in such a short timeframe.

Proposed Changes – Zone should be Suburban Neighbourhood Zone – not Housing Diversity

In regard to the proposed changes, I am opposed to the proposal for changing my current Residential Zone, Policy Area 23 to a 'Housing Diversity Neighbourhood Zone'. My area, loosely bound by South Road, Henley Beach Road, Marion Road and Sir Donald Bradman Drive is currently entirely residential in nature, low density, with a range of late 19th century to early 20th century homes, interspersed with some more recent infill.

The most similar 'like for like' zone in the planning reforms is the 'Suburban Neighbourhood Zone', with character overlay.

There is no rationale for the proposal, as is not consistent with my neighbouring suburbs with similar history, heritage and character, nor is it 'like for like' what we have now.

The clear intent of the current zone is that blocks will be low-very low density. This is inconsistent with the objectives of the 'Housing Diversity Neighbourhood Zone', which states that this area may apply to existing medium density policy areas.

The current zone clearly states that the area will be comprised predominately of detached and semi-detached dwellings. This is fundamentally inconsistent with the objectives of the 'Housing Diversity

Neighbourhood Zone', which provides replacing existing dwellings with medium density housing, primarily in the form of terrace housing, group dwellings or residential flat buildings.

In addition, the proposed zone facilitates mix usage of land in residential areas with only one exclusion (ie less than 1000m) and has very vague parameters of not interfering with residential amenity. This needs much greater detail and further consultation as this would significantly change what can currently occur in my area. The fear for many residents of what could occur on a neighbouring property is very real.

The 1996 Heritage Review contains an overview of some of the rich history that provides the foundation for our suburb. This will be lost if you do not give appropriate regard to the more appropriate zone as a part of the planning reforms. When reading this document or walk around the suburb, you will understand why my area should be transitioned to '*Suburban Neighbourhood Zone*', in keeping with the rest of the suburb.

In addition, all other Character Policy Areas other than this area are proposed to transition to the Suburban Neighbourhood Zone.

Lack of Design Quality Principles

I am a strong proponent for housing diversity and regeneration of housing options in appropriate areas. However there is a **distinct lack of regard for design elements in this new code**. While there is a perception that many people are anti-development when commenting on retaining character and heritage housing stock, the reality is that most are actually just sick of incredibly poorly designed, low-quality 'one-off' developments that are now peppered throughout most suburbs. Development of the new Planning and Design Code is the opportune time to create a system that gives stronger regard to design quality principles - however this has been missed in the current draft.

Corridor Creep

Another issue I wish to bring to your attention is an issue regarding the Urban Corridor.

Under the proposed planning changes, the Urban Corridor Zone – High Street Policy Area 35 (being the zone along Henley Beach Road between South Road and Marion Road) is proposed to be an "Urban Corridor Main Street" Zone.

There is important background context that must be considered as a part of the reforms for this area. At the time that the Urban Corridor Zone was introduced for the City of West Torrens, all of the collateral that was being used for consultation with the community expressly implied that the development changes being proposed was for **along** the corridor itself (being Henley Beach Road), meaning that it must have corridor frontage and that what was being proposed was changes for development along the corridor. Parts of the current zone are limited to Henley Beach Road Frontage (all of the Eastern Side of South Road, but the majority of the Southern side of South Road extending through to streets like Norma Street which are largely residential from the western end of Falcon Ave.

Another oversight in implementing this, was the fact that the northern side is only half a block back, not the whole block. We are urging you to look at this strip to ensure that the character homes on Norma St are retained by ensuring the Corridor only extends half a block back, as it is on the northern side.

Since the changes to the Urban Corridor Zone have been introduced, it is clear that what was being consulted on in 2013 and 2015 was misleading, as developments have been proposed that are not along the corridor itself. This is causing significant angst for the community and lots of people are now considering selling and moving out of fear about what the suburb is going to become ('Zone Creep').

There are two options need to be included in the changes as a part of the "Urban Corridor Main Street" Zone, namely:

- ensure that the developments within the corridor zone must be **along** the corridor (as was the original intent) and therefore must have corridor frontage, rather than simply be along the suburban back streets with no contact along the corridor; and
- revise the boundary for the new Zone for the areas of the current corridor zone are residential, meaning west of Falcon Avenue along Norma Avenue should be treated as Suburban Neighbourhood Zone (photo of the streetscape along this street below).

Attachment 1 shows the current corridor and the red line shows where the zone needs to be changed to ensure the zone remains **along** the urban corridor and the current streetscape.

If what is requested above is not able to be considered as a part of the planning changes to fix the 'Zone Creep', it is requested that further consultation occur with the community on what the impact would be if the zone west of South Road along Henley Beach Road be zoned as 'Urban Corridor Living' Zone.

Conclusion

The changes of this nature will have significant impact to my local community, city that I love and state I live in. I want to be part of a community that plans for a sustainable future for my children and those after them. I do not want that community to be buildings that do not last the test of time, that have little regard for the environment and that do not fit in with the character of my area or have no architectural merit.

In keeping with the principles for 'like for like' zoning, the existing 'Cowandilla / Mile End Character Area 23' should be rezoned to 'Suburban Neighbourhood Zone.' Failure to do so would be a fundamental policy shift, and will see the amenity, character and liveability of this beautiful, historic suburb and its close-knit community destroyed.

Further, in order to ensure consistence and integrity of the historical homes, the Urban Corridor needs to reflect the north side (ie 1/2 a block back instead a whole block) on Norma St, Mile End.

Given the significant shortcomings of the current engagement process, it is critical that the community are more meaningfully engaged on these potential changes before implementation.

I trust my concerns will be given due regard in the next stages of this process.

Kind regards

Sarah White



Attachment 1 – current corridor zone with red line where the area that needs to be changed.

