

18 February 2020

To Whom it May Concern

PLANNING & DESIGN CODE - PHASE 3 (Alexandrina Council Area)

I live in the Alexandrina Council district.

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.

My specific comments follow:

General Neighbourhood Zone: The draft Code places most of Alexandrina Council's Residential Zones in the General Neighbourhood Zone. The policy in this new zone is entirely at odds with current zone policy and allows for a far greater intensity of development than existing. The current zone focuses on preserving character rather than accommodating change and infill and does 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.**

All Existing Residential Areas:

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 (e.g. office and shop) should be "restricted development"**. Alternatively, a new zone should be created purely for residential land use.

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 in Port Elliot.

Existing siting, setback and floor area criteria should be maintained throughout all our residential areas.

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 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.

I have specific concerns with regards to the Historic Area Statement are as follows:

the generic introduction makes no reference to the Historic Area Overlay being described, so that no context is provided about the historic background and development pattern, nor our townships' heritage values, the map provided is grossly basic without any detail such as street layouts/ subdivision patterns, already listed local and state heritage places, there is inconsistency in mapping style of the proposed Historic Areas.

Alexandrina Council's existing Development Plan maps are far better, and should and could be adapted to replace the minimal, inadequate mapping provided,

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. **This is wholly inappropriate in our townships. A hierarchy of centres should be maintained.**

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.

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 CWMS infrastructure, especially roads and stormwater systems, under stress.

Tree Canopy and Climate Resilience The draft Code facilitates 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 and setbacks.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns which are shared by many residents, there will be an unacceptable loss of local character and amenity in our townships in the Alexandrina Council area. Once amended, the draft Code should be put back out for further community consultation.

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

Yours sincerely,

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