

From: [Oliver Mayo](#)
To: [DPTI:Planning Engagement](#)
Cc: [Margaret Mayo](#); [REDACTED]
Subject: Consultation on The Draft Planning and Design Code for South Australia
Date: Wednesday, 26 February 2020 2:40:31 PM

Dear Madam/Sir,

The document https://www.saplanningportal.sa.gov.au/_data/assets/pdf_file/0007/587590/Guide_-_Draft_Planning_and_Design_Code.pdf refers frequently to public transport but does not explain how this can be improved as mixed use development is expanded and closer building, leading to increased population density, is permitted. There is no discussion of what new, convenient, cheap and reliable public transport will be offered. SPP11.3 and 11.11 are relevant, but will run into the obstacles just mentioned. Major rethinking is needed, not just relaxation of planning to allow overdevelopment. Old thinking is revealed in 'policy responses' like 'Minimum net residential densities will continue to be sought in Urban Corridor (Living), Urban Neighbourhood, and Urban Activity Centre zones. These zones are focussed around public transport nodes, activity centres, and employment hubs, and the use of minimum prescribed densities will assist in facilitating population growth in these strategic locations.' (p. 125). (SPP11.12 is similar.) Trees are hardly mentioned in the Draft Code, though there is recognition of citizen concern at loss of trees (e.g. p. 44). 'Canopy' is mentioned 7 times, but usually as a pious hope, as in the 'policy response' to achieve greater canopy coverage: 'The Code also provides guidance on on-street car parking; privacy; overshadowing; local amenity; heritage and character; site coverage when existing buildings are replaced with more dense building forms; and retention (or expansion) of the tree canopy, particularly for residents in infill areas.' (p. 35, p. 45, SPP5.11)

As a resident in one of the oldest parts of the City of Burnside, I consulted

https://www.saplanningportal.sa.gov.au/_data/assets/pdf_file/0015/613302/Historic_Area_Statements_and_Character_Area_Statements_-_Phase_3_-_City_of_Burnside.pdf

and was surprised to see that the Lockwood Road-Hallett Road-Greenhill Road part of Burnside is not included. Historic houses such as Undelcarra, Ivymeade, Clifton and Ringmer, the Burnside Christian Church, the Melrose/Ferguson house that forms part of St Peter's Girls School and the old hotel on the corner of Lockwood Road and High Street lie in this area. It may be that some of these houses are already identified in some other planning document, but there should be something broader, to protect the character of the locality, i.e. inclusion in the Historic Area statement. Major historic houses such as Erindale, Fernilee Lodge and a house on Lockwood Road built by an early Museum director have already been lost to development. Furthermore, wanton destruction of significant trees continues apace, since the 'significant tree' protection was watered down. (I could find no mention of trees in the City of Burnside document.)

There is no mention of public transport in the Historic Area Statement, yet provision of convenient, cheap and reliable public transport is essential to maintaining the character of any historic area. South Australia is sadly lacking in this respect.

Thank you for the opportunity to comment.

Yours faithfully,

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