

DIT:Planning Reform Submissions

From: Lorrelle Taylor [REDACTED]
Sent: Wednesday, 9 December 2020 4:35 PM
To: DIT:Planning Reform Submissions
Subject: Revised Planning Reform Submission - Phase 3

To Whom It May Concern
Submission on revised draft Planning and Design Code Phase 3.

In response to the revised draft Planning and Design Code - Phase 3.
I am but one small drop in the ocean of viewpoints, but as a long-standing resident of the City of Burnside, I wish to express the following strong concerns and comments on a number of key issues in the Revised Draft Code Phase 3.

What is evident to myself is the at the State is embarking on decision-making that entails significant change, the implications of which will create a flow-on pattern affecting current and future generations of this State.

Such decision-making requires clear, concise minds and experience to determine the careful direction of this future.

There are so many dimensions in this process, from Natural Hazard policies, Flood risk mapping and appraisals, water sensitive urban design structuring, off street parking issues, building heights, set backs, loss of tree canopy and habitat environments, waste management, emergency vehicle access, lighting, community implications, landscape values, urban water management, community open space accessibility, whole of life maintenance and management costs for utilities, infrastructure, earthworks, accessibility for pet owners etc.

1. Proposed Zoning of Residential Areas

The revised draft code places much of the City of Burnside's residential areas in the Suburban Neighbourhood Zone. This zone has emphasis on quantitative criteria such as height, set-backs and site cover over design compatibility.

The proposed policy is also inconsistent and incompatible with the current zone policy and places less emphasis on the established character of these areas and is therefore likely to result in substantially poorer design outcomes.

The following areas should be included in the Established Neighbourhood Zone as this new zone contains desired policy outcomes which more closely resemble that which currently exists, particularly in relation to envisaged pattern of developed, site coverage, set backs and dwelling design.

Linden Park
Erindale
Frewville
Hazelwood Park
Rosslyn Park
Glenside
Glenunga
Leabrook (part)
Kensington Park (part)
Kensington Gardens (part)

Burnside (part)

Toorak Gardens (part)

2. Setbacks from Boundaries

I am extremely concerned that the current requirements for set backs for developments from side and rear boundaries will be substantially reduced, particularly for 2 storey development. This will severely impact the amenity of properties and street-scape, particularly in relation to access to privacy, sunlight, overshadowing and the space in and around buildings.

I request that the current setback criteria in the City of Burnside be maintained in all residential areas through a technical and numerical variation and, in particular, all 2 storey development should be set back at least 4 metres from the side boundary and 8 metres from the rear boundary of residential properties.

3. Building on the Boundary

The revised draft code continues to allow for development on the boundary up to 11.5 metres in length. This is a substantial increase from the current maximum increased overshadowing and loss of amenity. I request that the current requirement of 8 metres be maintained in all residential areas.

4. Commercial Development in Residential Areas

Currently, in the City of Burnside Council's residential areas, shops, offices and educational establishments are non-complying. Under the new code, these non-residential uses will be allowed in existing residential areas, which will adversely impact traffic, parking, noise, neighbourhood amenity, and the character of our suburbs. This is unacceptable. All uses which are currently non-complying in our residential areas should be "restricted development". Alternatively, a new zone should be created purely for residential land use.

5. Historic areas

The term 'representative building' is potentially misleading. It infers that current Contributory Items are only "representative" value, rather than each being of individual historic value as a significant member of the historic collective group, irrespective of their form or design. I suggest instead using the term "Contributory Building" or "Nominated Building".

6. Public Notification

The draft code should reflect on 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 site, 2 storey development, earthworks when new dwelling is located 600mm above ground level, development on the boundary and change of use from residential to non-residential.

7. Tree Canopy and Climate Resilience

The draft code facilitates larger developments, the easier removal of trees on both private and public land, increased infill development opportunities, increased number of street crossovers, and reductions in minimum site areas, site coverage and set backs. This will result in a significant reduction in canopy cover, habitat loss and climate resilience. The requirement to plant a reasonably sized tree as part of a proposed development should not be circumvented by paying money into a tree fund as this would allow erosion of tree canopy in that specific location. Requirements for minimising tree planting size and ongoing maintenance should be written into both code policy and conditions of approval.

8. Private Assessment of Development

Each of the design and land use issues raised above are critical given the increased role of private planning consultants in the decision-making process.

Private assessors should not be able to make 'judgement' calls where proposed development deviates from Deemed to Satisfy criteria or when it involves interpretation of minor variations. The above issues should be addressed and the revised draft code be re-amended to reflect these concerns, otherwise the result will be unacceptable loss of local character and amenity within the Burnside Neighbourhood community.

I trust that the concerns details above will be given your full careful consideration, and I thank you for the opportunity to address these concerns.

Yours sincerely,

Lorrelle Taylor

