

SA Planning Commission

By email: DPTI Planning ReformSubmissions@sa.gov.au

17/12/20

To the Officers Concerned

Submission on the revised Draft Planning and Design Code Phase 3

I wish to strongly object to a number of key elements in the draft Code which will have significant negative outcomes on the historic inner suburbs and the total amenity of Adelaide which make this city a desirable place to visit and live. Please take time to improve this Code-there is no hurry as the population of Adelaide will not be increasing suddenly due to falling birth rates and minimal migration in the next two years.

1. Inadequate policy for Residential Historic Conservation Zones and Residential Character Zones

There is inadequate policy direction for the above, desired character statements have been removed from the new Code and there is a concerning lack of detail in the Code about preservation of these areas. The Established Neighbourhood Zone must be replaced with the term Historic Residential Conservation Zone to prevent increased subdivision in these inner areas which give Adelaide its interstate and internationally admired character.

2. Tree cover and Climate Resilience

The draft Code encourages the easier removal of trees and vegetation in our suburbs with its single minded urban infill focus. It is of great concern to me the Code is ignoring the scientific strategies accepted as critical to deal with the heating of our climate i.e. increasing tree and vegetation in our houses and streets. I expected a new Code to be leading the way in dealing with increasing heat in our cities but it is so lacking in any leadership. I am totally opposed to the establishment of a tree fund to let developers abrogate their responsibilities to help deal with the heating of cities. I am amazed that a team of public servants who wrote the Code are so scientifically ignorant!

3. Public Notification

This Code totally removes the rights of citizens to participate in decisions about their neighbourhoods. Citizens and the public **must** be notified about all developments which propose to changes to the building envelope in their neighbourhood including those on the boundary of their home and the change

of use from residential to non-residential. Also, they must have a right to be heard by any decision making body. This Code creates 2 classes of citizens in land use in South Australia- the elite decision maker and the disenfranchised small landowner.

4. Private Assessment of Development.

I am totally opposed to this element of the Code. The opportunities for corruption are too many. Assessors must not be able to make decisions where criteria are not clear. Local Councils with their teams of accountable public servants must maintain control over design and land use final decisions.

5. Commercial Development in Residential Areas

I am concerned about the relaxation of rules relating to non-complying land use in residential areas in the new Code. The proposed range and scale of new commercial land uses in residential areas is not acceptable. The amenity of the suburbs will be adversely impacted with increased traffic and noise if these developments proceed. A new sub zone must be created for purely residential land use.

6. Building on the Boundary

The revised draft Code extends the opportunity for building on the boundary up to 11.5 metres. This will increase problems with overshadowing and loss of amenity. I urge you to maintain the current 8 metres wall direction and add more direction about boundary walls in Historic and Character overlay areas.

Yours Faithfully,
Mary Rumbold



Malvern