

South Australia Planning, Development and Infrastructure ACT 2016

Representation on Application

Organisation:

First name:

Last name:

Email: *

Consultation Document Submissions

Part 12 - Concept Plans

- Support
- Oppose
- Amend

Your Feedback

Concept Plan [REDACTED], Residential Growth, Alexandrina Council, indicates a parcel of land owned by us within the Linear Park / Open Space portion of the zone.

Allotment 508 in DP 72267, CT 5975/704 comprises some 8,633 square metres of high-profile flat development land with extensive frontages to North Parade, Braemar Drive and Adelaide Road.

Council has seemingly sought to force the land to be handed over for public reserve without they seeking to purchase and contrary to the principles set down by the decision of the Full Bench of the Environmental Resources and Development Court in the case of Kipa Freeholds Pty Ltd vs City of Tea Tree Gully & Ors (no 2) in 2014.

This concept plan 113 has carried forward from the concept plan adopted in the Council DPA of September 2018.

In that DPA process, the Council failed to take the advice and recommendations of the Minister for Planning and his Department as noted in letter from the Hon John Rau MP to the Chief Executive Officer dated 17 June 2015 for which we had made submissions and provided expert economic studies which supported the 'Adelaide Road Land' (this land and land on the opposite side of Braemar Drive) being zoned for commercial, retail and community uses which could enable the proper expansion of the Town Centre to support the growing population of the Township. The Department undertook their own review through Essential Economics who

they engaged for this purpose which 'suggests that the potential exists for an additional 2,600 square metres of supermarket floorspace in Strathalbyn over the next 10 years. The findings also suggest that, in total demand exists for 5,750 square metres of retail floor space over the same period, a proportion of which could be located within a new neighborhood centre.' The Department made submission to the Council by letter dated 18 January 2018 in respect to the 'Adelaide Road Land' in which the suggested that Council make further amendments to the DPA to provide greater justification for the increase in minimum allotment size from 300 sqm to 500 sqm; give further consideration to the provision of non-residential development in the form of low impact local conveniences (including a supermarket); the reduction in linear park / open space from 25% to a level which is consistent with the 12.5% target in the *30 year Plan for Greater Adelaide* and the *Development Act 1993*. Further, by email from Andrew Humby (DPTI) to Sally Roberts of the Council he notes ' the Department continues to support a flexible policy framework that enables the consideration of new forms of non-residential development within the 'Adelaide Road land', where it is harmonious with the natural surroundings, character and heritage of the area and does not have an adverse impact on the role and function of the existing town centre. The 'Adelaide Road Land' is a substantial greenfield site, which unlike established residential areas, has the capacity to suitably accommodate larger forms of non-residential development (greater than 250 sqm) given its ability to minimize the impacts on the adjoining developments and manage the interface between existing and future land uses.'

Notwithstanding the advice from the Minister and his Department and the written responses to the Public Consultation which overwhelmingly supported commercial development of our land, Council proceeded to obtain authorization to the DPA and this has been adopted into the current Development Plan.

The existing town centre has subsequently continued to see a steady decline in retail activity and an increase in retail vacancies. The loss of retail sales to Mt Barker and beyond has continued to increase and with this the local retailers are experiencing further declines on gross sales. The emergency hospital facility has been closed with these patients referred to Mt Barker. The medical practices have not expanded and more patients are being referred every day to services in Mt Barker. CLASS are relocating their head-office from Strathalbyn to Mt Barker. The local abattoir has recently closed and a motor vehicle parts business closing at Christmas. Covid-19 has demonstrated that it is no longer possible to live and shop in Strathalbyn as many essential items are no longer available within the town.

Despite the numerous economic studies which have highlighted the need substantial new additional retail services, these have not occurred because there is no suitably sized, located and zoned land in the town centre to accommodate the scale of development required to hold customers in Strathalbyn.

Planning Applications by OTR for a new integrated fuel outlet on Lot 508 have been refused by the Council Assessment Panel notwithstanding support from Council and their expert planning consultants. OTR still want to provide services to our town but will not re-apply until the zoning is supportive.

Current applications for a new child care, gym, chemist, medical centre and allied health premises are being hindered by the constraints of the current zoning notwithstanding that these are now generally supported by the Council.

Current Planning Applications to create 115 community titled allotments in the centre portion of the 'Adelaide Road Land' to provide an alternative housing choice within the town (retirement, disability and low-income) has been stalled because the resulting allotments are each in themselves smaller than 500 square metres (Generally around 300 sqm) although the the total site is 7.072 hectares provides some 615 sqm per dwelling. Council Planners are generally supportive but want substantial building details for the development and we want the buyers to have control of their design subject to normal Planning and Building controls. Clearly this would be better supported by adjacent retail and business services.

Placing the Adelaide Road Land within the Hills Neighborhood Zone under the new Planning Code which strengthens the limitations on the scale of non-residential development (maximum of 200 sqm) may make

urgent new development much harder to facilitate. The current zone is wrong for the town and the Hills Neighborhood Zone is wrong. The land either side of Braemar Drive must be re-zoned if Strathalbyn is going to provide for its residents needs. Otherwise, we all have to accept that there will not be a viable town centre - that will be Mt Barker!

Council has at last realized that the town centre is dying and cannot be revitalized without a significant new development of a scale which cannot be readily accommodated within the heritage, ownership, physical and economic constraints of the existing town centre. Whilst other towns on the Fleurieu have expanded and developed in the past 10 to 15 years, Strathalbyn and Goolwa have stagnated and shrunk despite significant resident population growth. We cannot have a new DPA to allow Strathalbyn to survive until the new Planning and Design Code is activated.

The ongoing delays in implementing the new Planning and Design Code means that the town must continue to decline commercially, loose retail and business services, loose medical services, loose employment and move further towards a dormitory town with a few cafes, tourist attractions and essential top-up services. Reportedly, at last count by DPTI, Adelaide Road has over 8,000 cars every day on average heading to and from Strathalbyn to Mt Barker/Adelaide and the ABS Census data confirms that the vast majority of our working population works outside of our town. We need to urgently fix our town.

The 'Adelaide Road Land' can, as currently zoned, accommodate around 200 houses - two cars per house = 400 cars heading out of town every day for work and basic shopping needs - more traffic accidents on Long Valley Road where impatient drivers pass on double-white lines in 'blind' corners and more old Strathalbyn residents pottering off to Mt Barker each week and travelling Long Valley Road at speeds varying from 60 km/h to 100 km/h depending on their vision and driving capability and always faster when the road is wider (overtaking lanes).

We need business and employment in Strathalbyn now - not in 5 to 10 years when it will all be too late.

Hopefully, the new code will be implemented very soon so we can apply for re-zoning to enable our town to have a viable future.
