

From: Judith Urquhart [REDACTED]
Sent: Tuesday, 22 December 2020 4:28 PM
To: DIT:Plan SA
Subject: Late submission

I have just tried to email our Code submission but it has been rejected. It was agreed with Anita Allen that we could lodge today as our Council did not meet until last night to endorse the submission. I used the email address provided by Kylie Waymouth our CLO – DIT.PlanningReformSubmissions@sa.gov.au

Thanks

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Mayor Keith Parkes, Elected members and staff extend to you

season's greetings



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Thursday 24 December 9am-1pm. Tuesday 29 December to Thursday 31
December 9am-5pm. Reopening Monday 4 January 2021.



Please consider the environment - do you really need to print this email ?



Overlays

1. Scenic Routes Overlay - the inclusion of such an overlay was suggested but this has not been adopted. Instead, a Scenic Quality Overlay has been developed, with very limited application, and none in the district. With the State Government promoting scenic drives such as the Fleurieu Way and Great Southern Ocean Drive it would seem prudent to protect the qualities of the landscapes through which these, and others such as Crows Nest Road, Flagstaff Hill Road, Ashbourne Road approaching Strathalbyn, pass. Scenic roads are fairly easy to identify, and are easily mapped.

Seek to have a Scenic Routes Overlay created over identified tourist routes and roads with significant views and vistas.

2. Heritage Adjacency – this appears to apply only to abutting properties. We feel that it should be extended to include properties on the other side of the road, in line with the previous “adjacency” rule of a distance of 60m.

Zones

3. Rural Horticulture Zone at Langhorne Creek – need for a sub-zone to address specific land division policy. Critical Langhorne Creek policy was developed with the community and we feel that Code policy changes should not be changed without adequate consultation.

Propose that a subzone be established over the Langhorne Creek Region (already identified in the Development Plan), including PDCs 9, 10 & 11 of *Mount Lofty Ranges Policy Area 9*, at least in the meantime, to allow for consultation with the community over any proposed changes.

4. Goolwa Wharf – Infrastructure (Ferries and Marina Facilities) Zone is inappropriate as it focusses on *on-water development associated with the function of marinas and passenger ferry services (together with a range of complementary waterfront-oriented recreational and tourist development activities)*. Whilst the latter (in brackets) applies here, the former (on-water) does not. Activities in this location are land-based focussing on the railway and historic wharf economic activity; there are no marina and passenger services in this location.

There does not appear to be a suitable existing zone. It is noted however that in the vicinity of Mannum, a sub-zone exists for recreation and tourism focussed on the River Murray called the River Murray Experience Sub-zone

Propose that a Goolwa Wharf sub-zone be developed based on the existing Goolwa Wharf and Surrounds Policy Area 6.

5. Rural Living Zone – this zone does not have an assessment pathway for *Farming* and *Agricultural Buildings*, both of which are an envisaged form of development.

Seek to have *Farming* and *Agricultural Buildings* listed as Accepted or Deemed-to-satisfy forms of development.

6. Rural & Adelaide Country Zones – neither zone has had further policy applied to guide boundary realignments. Sound policy currently exists to ensure that realignments do not compromise sustainable primary production and biodiversity outcomes.

Many of Alexandrina's boundary realignment policies are covered by General land Division policies including those relating to waste control (although some rather vaguely), and those relating to siting of dwellings by zone policies.

However the following policy is not addressed in the Code:

- directing the clustering of smaller allotments adjacent to existing smaller lots and/or on less productive land, requiring smaller allotments between 1 – 2ha.
- the consolidation of the balance on more productive land
- new allotments containing a dwelling to be >1ha.
- not more than one dwelling is retained on any resultant allotment (except in the case of an approved second dwelling which is dependent on and connected to a single effluent management system)
- the division does not require rights-of-way, new private roads or the creation of hammerhead allotments.

Suggest the inclusion of the following in the AC and Rural Zones in Alexandrina:

PO Boundary realignments result in the creation of small allotments of between 1 – 2ha. clustered on less productive land and the consolidation of the more productive land in one parcel and.

- (a) do not create conditions that require the creation of rights-of-way, new private roads or additional hammerhead allotments*
- (b) not more than one dwelling is retained on any resultant allotment (except in the case of an approved second dwelling which is dependent on and connected to a single effluent management system)*

7. Adelaide Country Zone – opposed to this name. In no way does it reflect the qualities of the zone - productive farming, niche produce, high visitor numbers, and high scenic quality.

Propose a name change and reiterate the name suggested some months ago by the Mount Lofty Ranges Planners' Group – *Productive Rural Landscape Zone*.

8. Currency Creek - Code policy does not address the land division/new dwelling issues. Current policy prevents individual dwellings on "paper" titles in the location depicted on the map below. The *Limited Land Division and EFPA Overlays* do not achieve this as the titles already exist.

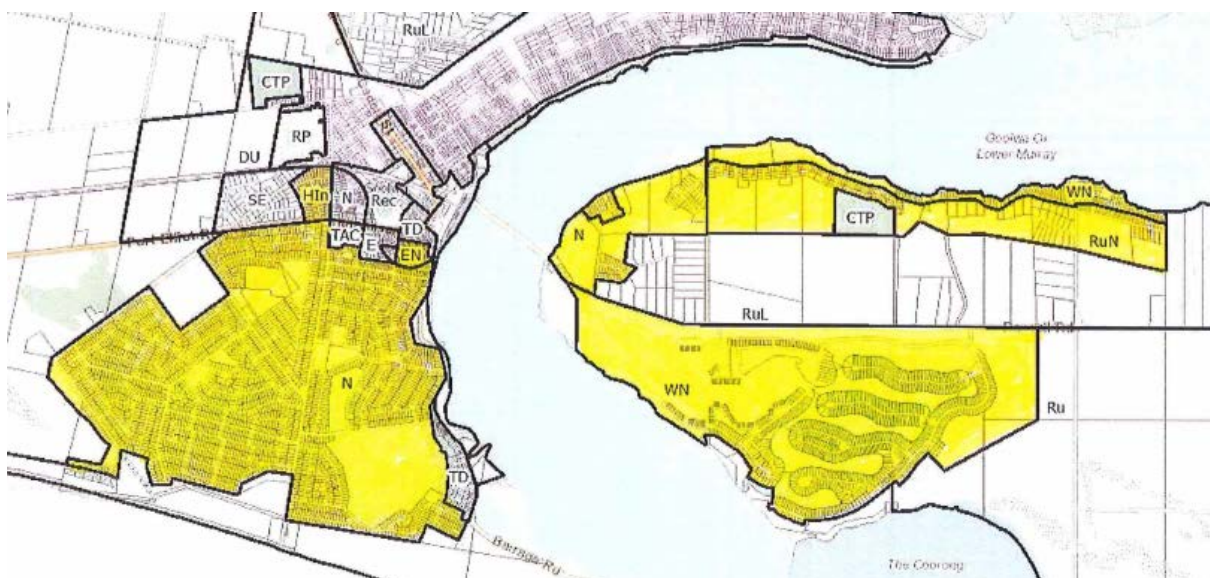


Propose the inclusion of Concept Plan Alex/21 or apply a Currency Creek sub-zone including (Currency Creek Rural Living Policy Area 31) PDCs 3 & 4 (amended to refer to Concept Plan No.21 only)

9. Battle-axe/hammerhead allotments are currently precluded in many parts of the district. The Code does not address this.

Propose that a TNV precluding battle-axe/hammerhead allotments be applied to all areas currently identified as being inappropriate for such land division, as mapped below, and including

- all Neighbourhood zones in Strathalbyn (HN, N, EN & MPN).
- Neighbourhood Zone at Milang
- Neighbourhood Zone at Mount Compass
- all Neighbourhood zones on Hindmarsh Island (refer following map)
- Home Industry Zone, and Established Neighbourhood and Neighbourhood Zone south of Port Elliot Road, Goolwa (highlighted on the map below)



- All Neighbourhood, Established Neighbourhood and Home Industry zones in Port Elliot and Middleton (highlighted on the map below)

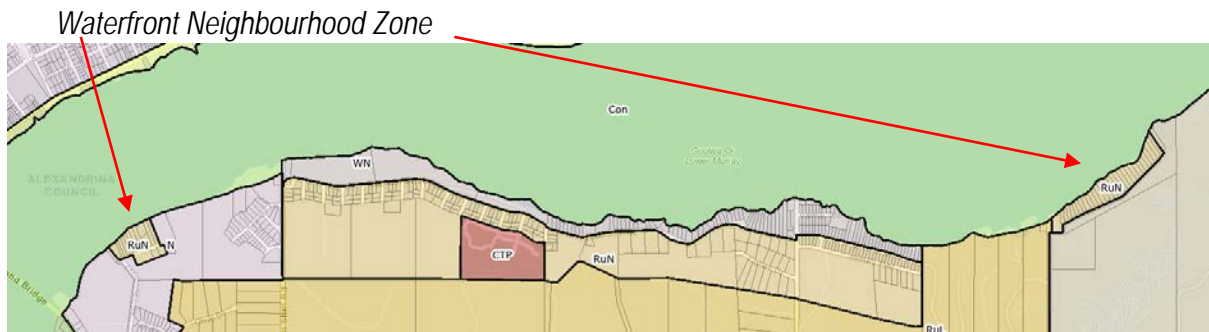


10. Township Main Street, Port Elliot – current policy precludes the creation of additional allotments in Precinct 43, which coincides with this new zone, but the Code does not address this. Propose that a TNV be applied to the Township Main Street Zone in Port Elliot to preclude the creation of additional allotments.

11. Master Planned Neighbourhood Zone, Sandergrove Road Strathalbyn – this zone is not appropriate and is inconsistent with the surrounding Neighbourhood Zone. There does not appear to be a sound planning reason for this point of difference.

Propose that this zone be changed to the Neighbourhood Zone.

12. Hindmarsh Island – incorrect designation of zone (refer map below). During discussions after the first consultation new zones were developed, including the *Waterfront Neighbourhood Zone* which was applied to waterfront residential areas on Hindmarsh Island. It appears that two pockets at O’Connell Avenue and Narnu Bay Drive have mistakenly been zoned *Rural Neighbourhood Zone*, and should be re-zoned to *Waterfront Neighbourhood Zone*.



In addition it appears that a triangle of land previously zoned *Conservation* has mistakenly been zoned Neighbourhood (refer map below) and should be amended back to *Conservation*.



13. Waterfront Neighbourhood Zone (as corrected – refer No.12 above) Zone at the western end of Hindmarsh Island needs a TNV (25m) setback to the water’s edge – this is currently a non-complying trigger in corresponding Policy Areas 15, 16 & 18
Propose the inclusion of a 25m setback to the water’s edge in the Waterfront Neighbourhood Zone at the western end/north coast of Hindmarsh Island.

General Policy

14. Advertisements – the removal of the word “primarily” has not been addressed. This one word is very important as it can afford the opportunity for third party advertising.

Seek to re-word Performance Outcome 3.1 of *Advertisements* to read as follows “*Content of advertisements is to be limited to information relating to the lawful use of the land on which they are located.*”

15. The Design in Rural Areas module has been deleted and there is inadequate policy to address elements such as design and articulation, scale, profile, materials and colours of buildings in

areas of high scenic quality which are responsive to local character and geography. The Code appears to rely on setbacks and building heights with little reference to local characteristics. Propose the reintroduction of a Design in Rural Areas module that provides appropriate policy to address design elements of buildings within areas of high scenic quality. The following policies are proposed:

Buildings in rural areas with high scenic quality sited and designed to reduce visual impact on the landscape.

- (a) are sited in valleys and below ridgeline*
- (b) use natural colours which blend with the rural backdrop*
- (c) incorporate large eaves, verandahs and pergolas which create shadowed areas*
- (d) have a low profile which complements natural landforms*
- (e) setbacks from roads relate to the effectiveness of the screening of the building by existing vegetation and/or natural landforms*
- (f) are grouped together and sited in response to existing vegetation and topography*

OR

Dwellings, outbuildings, farm buildings and other structures should be clustered together, unobtrusive, designed and finished to blend with the rural landscape and screened with vegetation so as to result in low visual impact when viewed from roads and surrounding dwellings and land in order to preserve landscape qualities.

16. The change of wording to include *clearance of valued trees AND substantially intact strata of native vegetation* has not been addressed in Performance Outcome 1.1 of the Forestry module.

Propose that the word '*or*' between '*vegetation*' and '*where*' in Performance Outcome 1.1 of the Forestry module be replaced with the word '*and*' to ensure that commercial forestry is not established where the clearance of valued trees and substantially intact strata native vegetation exists.

Other

17. Policy guidance for jetties/pontoons – new Neighbourhood Waterfront zone envisages these and excludes them from notification but they are not mentioned in the Rural Shack Settlement Zone (Murray Mouth and Clayton Bay) and need to be included in the latter.

Propose the introduction of reference to *jetties, pontoon, boat berth (or any combination thereof)* in Performance Outcome (PO) 1.1 and DTS/DPF 1.1, and inclusion in Table 5 Notification part 3 (exclusions) in the Rural Shack Settlement Zone.

18. The Code has very limited Restricted Development when compared to the existing non-complying lists in the Development Plan. There is a concern that it may be difficult to refuse developments that are not envisaged and may have been refused in the past.

Propose the introduction of a Performance Outcome that lists those types of development that are not envisaged in a zone.