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David Kilner

Nailsworth SA 5083

Department of Planning, Transport and Infrastructure
GPO Box 1815 /Adelaide SA 5001
Email DPTI.PlanningReformSubmissions@sa.gov.au
February 2020

SUBMISSION TO PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON PLANNING AND DESIGN CODE - PHASE 3 CITY OF PROSPECT

I wish to register my objections as follows:

1. The Planning and Development Code contains a number of errors and omissions; is difficult to navigate online and find information easily; language used is complex; document size unreasonable and it's difficult to find what will happen to my property and neighbourhood.
2. Objection to 350 zone as General Neighbourhood Zone
The new draft Code transfers the current 350 zone into a 300 General neighbourhood zone allowing greater intensity of development than what currently exists. City of Prospect's 92 narrow streets will struggle to cope with row developments of 200 square metres which it also allows. The current 350 zone focuses on preserving character. It does not envisage a greater range and intensity development than the 300 block size. With Prospect Council's three major roads as Urban Transport Corridors with high rise infill development, we understood we would not be required to have matching infill in our residential streets. I/we request that you move the 350 residential area into the Suburban Neighbourhood zone with Technical and Numeric Variations to match existing conditions.
3. All Existing Residential Areas Non-residential land use: Currently shops, offices and educational establishments are non-complying in Prospect Council's residential streets. The draft code will allow this development in all residential streets and negatively impact on traffic, parking, neighbours amenity, noise and liveability. It will completely change our suburbs' character which we want to protect. This is not acceptable and these developments should be restricted developments in residential streets i.e. not allowed.
4. All Existing Residential Areas Site coverage and setbacks: Under the proposed Code, building setbacks from both side and rear boundaries will noticeably decrease, particularly at the second storey. This will severely impact amenity and privacy and is not supported. I/We ask that existing site cover, set back and floor area criteria should be maintained throughout all Prospect Council's residential areas. It is important that our current minimum allotment sizes, heights and frontages widths match what currently exists in each zone.
5. Historic Area overlay
Contributory items (currently in Historic Conservation zones) need to be retained in the new Code. This needs to be done by using policy. Removing them from the current Code altogether will result in uncertainty and confusion for owners, neighbours and prospective buyers. Removal of contributory items is likely to lead to demolition. Retain existing protections and identification of contributory items.

6. Commercial centres

The Code places large scale centres and small local shops in the same zone, allowing large scale development and more intensive land uses in all these small areas. This would create complex problems with narrow streets leading into small groups of local shops. A hierarchy of centres should be kept with additional zones needed to cater for lower intensity local shops in older established areas.

7. Public Notification

The Code should include notification for all development that increases development intensity, including additional dwellings on the site, two storey developments, earthworks where the new dwelling is located 600mm above ground level and change of use from residential to non-residential.

8. Tree Canopy and Climate change concerns

The SA Government 30 Year Plan calls for increasing tree canopy cover. However, the draft Code's larger developments and easier tree removal on private and public land will lead to significant reduction in tree cover and habitat loss. The draft Code's Increased infill development, reduction in minimum site areas, site coverage setbacks and increased number of street crossovers will all contribute to heat bank effect. This is an unacceptable loss of local character and amenity in my/our neighbourhood.

9. Further consultation is required and date for the current consultation extended

I would like further community consultation once the Code's errors have been corrected and the draft updated.

Yours Sincerely



Dr David Kilner
19 February 2020