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Page 1: Planning and Design Code for South Australia

Q1 Which part of the Planning and Design Code would you like to make a submission about?(Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)

My submission relates to Urban code. (click here for council areas)

Page 2: Planning and Design Code for South AustraliaPersonal Details

Q2 Please provide your contact details below (Name, Postcode & Email are mandatory)Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name **Robert Lloyd**
Address [REDACTED]
Suburbs/Town **SEACOMBE HEIGHTS**
State **AU_05**
Postcode **5047**
Country **AU**
Email Address [REDACTED]

Page 3: Planning and Design Code for South Australia

Q3 Which sector do you associate yourself with? **General Public**

Page 4: Planning and Design Code for South Australia

Q4 Would you like to make comment on **Specific Topics for example : - Rules of Interpretation - Zones and Sub-zones - Overlays - General Provision - Mapping Land Use Definitions - Administrative Definitions - Referrals - Table of Amendments**

Page 5: Planning and Design Code for South Australia

Q5 Enter your feedback for Rules of Interpretation

Respondent skipped this question

Q6 Enter your feedback for Referrals

Respondent skipped this question

Q7 Enter your feedback for Mapping

Respondent skipped this question

Q8 Enter your feedback for Table of Amendments

Respondent skipped this question

Page 6: Planning and Design Code for South Australia

Q9 Please enter your feedback for overlaysclick next at the bottom of the page for next topic

Respondent skipped this question

Page 7: Planning and Design Code for South Australia

Q10 Please enter your feedback for zones and subzonesclick next at the bottom of the page for next topic

General Neighbourhood Zone

This submission strongly objects to the proposed planning classification of the areas south of Seacombe Road being classified as General Neighbourhood Zone with block sizes of 300 m² or 200 m² in a row dwelling. These areas as being on the hills face are more appropriately zoned as Residential Neighbourhood as in Bellevue Heights, which is the adjacent foothills-based suburb, with a minimum lot size of 1200 m². (Which is larger than currently) or more appropriately as Suburban Neighbourhood as in Pasadena and Panorama which also share the hills face and sloping blocks, with a minimum lot size of 700 m². This is close to the current Marion zoning which has been in place for many years. (I could not check this as the Marion Council has removed the current zoning from their website). Specifically, the suburbs that should be covered by this revised zoning are, Darlington (Heights), Seacombe Heights, Seaview Downs, Seacliff Park with the Northern boundary being Seacombe Road.

Page 8: Planning and Design Code for South Australia

Q11 Please enter your feedback for general policyclick next at the bottom of the page for next topic

Respondent skipped this question

Page 9: Planning and Design Code for South Australia

Q12 Please enter your feedback for Land use Definitionclick next at the bottom of the page for next topic

Respondent skipped this question

Page 10: Planning and Design Code for South Australia

Q13 Please enter your feedback for Admin Definitionsclick next at the bottom of the page for next topic

Respondent skipped this question

Page 11: Planning and Design Code for South Australia

Q14 Please enter your general feedback here

Respondent skipped this question

Page 12: Planning and Design Code for South Australia

Q15 Do you have any attachments to upload?(pdf only)

Planning Discussion Submission Final.pdf (141.5KB)

Submission Summary

This submission strongly objects to the proposed planning classification of the areas south of Seacombe Road being classified as General Neighbourhood Zone with block sizes of 300 m² or 200 m² in a row dwelling.

These areas as being on the hills face are more appropriately zoned as Residential Neighbourhood as in Bellevue Heights, which is the adjacent foothills-based suburb, with a minimum lot size of 1200 m².

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Specifically, the suburbs that should be covered by this revised zoning are, Darlington (Heights), Seacombe Heights, Seaview Downs, Seacliff Park with the Northern boundary being Seacombe Road.

Please do not inflict the damage to our community and our amenity that has been done in Warradale, and related suburbs. It is also most disturbing that these changes have not been tested in the ballot box either through local council elections or through a state election and such a major change should have a mandate from the public not simply be put in place by unelected officials.

I have elaborated this position in detail in the following pages.

Personal reflections relating to (House and Suburb)

- Planned suburbs with 800sqm ¼ acre blocks and parks.
 - Many areas of Marion were master planned to provide the traditional quarter acre block with associated public parks and strip shops provided on major arterial roads, which suited the lifestyle of the time which was less car dependent and people could walk to the shops for their groceries and sundries.
 - These planned suburbs are integral to the Australian way of life and the Australian dream of home ownership. Many of the migrant communities particularly from the UK left the crowded cities to get away from terrace houses and the slum environments that they encouraged.
 - Internationally many American cities are built around the car and suburbs providing space for people to live a quiet life and for children to play safely on their own property.
 - Personally, I prefer this style of living and that is why I have paid a premium to live in a suburb that offers these benefits.
 - In addition, the suburb of Seacombe Heights and those suburbs along the hills face have had larger blocks as a general rule due to the slope.
 - These plots have a unique character for a number of reasons, firstly there is a personal reason where the owner of the block has a view of the city or the ocean. Secondly those in the city looking up to the sparser foothill's development have much of the development shrouded with trees and the appearance is not that of a wall of concrete and brick, but of trees, in line with the rest of the Adelaide Hills face.
 - People who have built in these areas over many years have had to endure onerous restrictions with regard to building materials and plants as well as the ability to build on a limited percentage of the block. These restrictions added significant costs to the properties in terms of their development.
 - The current proposal completely negates all of the benefits of these suburbs that people aspire to and currently enjoy.
 - In addition, it also promises to significantly devalue the quality of life of the residents in these hills face areas as well as the visual amenity of the entire city looking towards the hills face.

Issues arising from the change in development planning.

- Lawns
 - Lawns offer a significant cooling benefit and an inspection of the heat map on the Marion Council's own website will show the significant benefit provided to the entire suburb from lawns. In addition, these lawns provide a safe space for children to play and interact at a time when significant and growing social and health problems are being experienced due to the lack of child activity and overexposure to electronic screen entertainment. The tragic recent death of a young child playing on Branksome Avenue should be considered in the context of the high-density developments on the street and lack of yard space for children to play.

From a water retention and water table replenishment perspective lawns provide the largest opportunity in the suburb to retain and store stormwater without expensive water tanks and pumps which can fail if power fails.

These lawns and associated benefits will be under significant threat given the proposed development changes minimising the blocks to between 200 and 300 m².

- Trees
 - Trees provide many similar benefits to lawns such as cooling, shade, and holding the soil together as well as providing an ecosystem for birds which provide a significant benefit to the community simply through their presence, as well as a natural insect reduction presence in the community. The belief that street trees maintained by council can compensate for the numerous trees held within private property is false given the monocultural nature of street trees not providing diversity of food sources for birds across different seasons. In addition, street trees have a tendency to damage road and services were space in private property can better manage this challenge.

- Parking and Street Congestion
 - Whether we like it or not our city has been designed to be significantly dependent on cars. With most adults owning at least one vehicle and with a typical dwelling including at least two adults we find that the new developments have pushed many cars onto the streets to the point that it is difficult for residents to be able to park on the street let alone accommodate visitors. Access for emergency services and other larger vehicles is extremely restricted with roadways being clogged with cars. The smaller size of many of the garages in current developments means the garages are used for storage as opposed for cars further exacerbating the problem.

- Noise
 - Environmental noise increases for a number of reasons firstly houses are simply closer together so even noise is likely to be of greater impact given noise dissipates at the cube of the distance, in other words a reduction in distance from an air conditioner from 3 m to 2 m means the noise energy increases by a factor of 3.4 times. This is further exacerbated by the fact that the building materials being used in the newer homes are much lighter potentially being greater transmitters of noise without suitable insulation. The increase in heat due to the loss of natural cooling and lighter building materials with less thermal mass, means that air conditioners will need to be operated significantly more. Adding to the overall noise pollution effect.

- Decline in Amenity
 - In suburbs that enjoy the current approximately 800 m² blocks such as Seacombe Heights, Seaview Downs, Seacliff Park, Darlington (all south of Seacombe Road). These suburbs enjoy generally quiet streets, lots of trees, birds singing in the morning, and generally a pleasant relaxed atmosphere.
 - Contrasting this with the increasingly cluttered streets in Dover Gardens, Seacombe Gardens, Warradale for example.

- Having grown up in the area the change is much for the worse from an ambience perspective due to the car and tree issues.
- The atmosphere and ambience are significantly different, cars being squeezed into front yards, lack of greenery, and poor traffic access have made these areas undesirable.
- The apparent higher level of rental properties in these infilled areas correlates with a high level of crime based on Advertiser maps.
- Decline in asset value i.e. what you paid for
 - The challenge is that people went out and borrowed money and paid significant taxes on the purchase and on an ongoing basis to secure a property in an area with a particular development code and ambience. These people have paid to secure a lifestyle. That lifestyle and potentially the flow on asset value are now being impacted by this policy without any democratic consultation through the ballot box. Any resulting asset changes in value will be borne by the residents either up or down. If you are not happy with the resulting outcome, those residents will need to move, incurring significant taxation and agency costs. Will this be compensated?
- Sloping Blocks Views and Legal Challenges.
 - The area south of Seacombe Road consists of numerous sloping blocks which bring their own unique challenges. Many of these blocks were larger and with this currently proposed code open up significant opportunity for development which will be detrimental to the surrounding properties. Not only the issues of car parking, but obstruction of views which were part of the payment consideration of the purchasers. This threat to the amenity and value of property will undoubtedly result in significant litigation and conflict between neighbours, and developers/authorities which is expensive, and highly undesirable in a community. Any authorities involved in this especially Council are likely to face legal action at every turn by disgruntled residents opposed to the devaluation of their principal asset and destruction of their lifestyle.

Council level

- Lazy planning policy as not strategic.
 - This whole process of planning strikes me as being particularly lazy as it does nothing to envision an overall living environment for residents. It simply allows development that is aligned to rules to take place at the whim of the market. In contrast to the original development of the suburbs with significant areas of master planning at least allowing for parks within these developments. Surely the Council want to

consider the quality of life of the residents. As well as other strategic elements such as transport and supporting infrastructure as part of the overall plan.

- Family living with space and ¼ acre block
 - Within Marion Council the ability to preserve areas that are appropriate for families should be paramount given the high density living that has been permitted in many suburbs so far. Should we not want to preserve what we still have of a traditional quarter acre block for family living.
- Increased rates base
 - A cynical view of this could see the council purely being focused on increasing rates and revenue base to build remuneration for executives based on the size of the city.
- Increased costs
 - Obviously increased density brings with it increased costs directly to service the needs of ratepayers with regard to rubbish collection and road use. One could argue that spreading the overheads over more households reduces the overall administration costs. However other costs are clearly not identified as part of the planning proposal.
- Costs socialised profits privatised.
 - With the increased density, additional stress is placed on all aspects of the infrastructure and services supporting households. Developers are taking a profit on subdivision, and council is taking a fee, however when the roads need repair and services such as, drainage, sewerage, water supply, power supply, gas supply, and Internet become overloaded and require significant capital investment. These costs are borne by the entire community not by the development.
- Street trees no planned green space increase
 - Despite a fee being paid for subdivision none of this is being directed into increasing public green areas. It is my understanding that these funds are being directed to maintenance of existing facilities as well as increased tree planting. These activities should be taking place in case and are an example of the erosion of overall amenity.
- Master plan i.e. 500m to any park. 500m to a rapid transit stop.
 - From a council perspective with the areas that have been heavily subdivided, they still have cars and they still have children and pets. It would be nice to see some strategic objectives, such as, any dwelling will be no further than 500m from a park, and no more than 500m from a rapid transport stop etc.
- New houses not much cheaper if at all.
 - While much is made of the need to accommodate ageing population and single living through downsizing. The benefit to the downsizer is minimal as the amount of money available from selling a property is very similar or less than the selling prices of the new downsized courtyard properties. So, while the downsizer may get a more modern home, they do not save money. In addition, their rates taxes and other charges will not be changing by much.
- Micro planned precincts.
 - The opportunity to create micro precincts within the city should not be overlooked as an objective to create differential lifestyles within a broader city. Marion has already done this with the Tonsley precinct and should consider capitalising on the

opportunity to develop planned solutions close to railway stations and major shopping centres. Such as those in Oaklands Park. These developments should focus on providing high density living with included shared amenities either including green space or adjacent to green space. The alternative is to create lifestyle hubs that incorporate higher density living with shopping and restaurants such as the Italian Forum Leichhardt. High density living for retirees such as the Sun City complex on the Gold Coast would also be an attractive option close to Marion shopping centre and Oaklands railway station. With regard to many of the towers in the CBD they are not within walking distance of rapid transit. The security in the city is questionable particularly in the evening, and they are not necessarily close to parks or restaurants in all cases. Marion has an opportunity to consider how to activate the areas around Marion shopping centre but also provide a lifestyle for those choosing high-density.

- Micro areas that are planned i.e. Italian Forum Leichhardt, Higher density with parks refer article <https://indaily.com.au/opinion/2019/11/18/the-green-key-to-tackling-urban-sprawl/>

City Wide (Reflections on overall plan)

- Integration with rapid transit network
 - With regard to the overall plan there are positive elements especially around heritage areas however the desire to hand over master planning with broad strokes to small building operators without any consideration of the fundamental nature of the city is in my opinion is a significant mistake. Higher density developments should take place close to railway and tram stops as they already are, in areas such as Bowden and Tonsley. This has the benefit of reducing car dependency. This should in no way force the traditional family suburbs to be dismantled or destroyed in the pursuit of higher density living.
- Consideration of green space density for cooling, water retention and native Flora and fauna.
 - Consideration should be given to appropriate green space being available around all buildings to facilitate cooling, water retention, and encourage native flora and fauna. This should be part of the overall strategic master plan rather than a simplistic code being parachuted in over the top of the city.
- Bike paths connecting
 - Higher density living precincts close to rapid transit hubs also lends itself to interlinked bike paths separated from roadways that will encourage use through walking and bike riding reducing car dependency.
- Energy Efficiency
 - It is also concerning that there is minimal focus on energy efficiency within the overall framework of the city. This takes many forms, the first thing to recognise is that the existing housing in many of the traditional suburban dwellings has a high thermal mass and is significantly less dependent on heating and cooling especially cooling, than modern dwellings. Many papers over the years have highlighted the dependence of the state on reverse cycle air-conditioning to meet cooling needs creating peaks in our demand this is primarily due to split system air conditioning

systems being required in homes that do not have sufficient thermal mass to retain a pleasant temperature. Even more recent constructions that are highly energy efficient remain a significant problem with regard to cooling see link below.

- (see <https://unisa.edu.au/unisanews/2019/november/story4/>)
- This is without considering the energy embedded in the existing homes that is being wasted, as well as inefficient transport utilisation through excess cars being needed to service developments as public transport is not available.
- Capacity of supply and service networks (Water, power, sewerage, drainage, gas, cable internet, wireless communications).
 - From an overall capacity and service perspective is not clear that there is any integration between this plan and the ability to service or supply the proposed residences. Costs of upgrades will be borne by the community whereas developers will escape the true costs of the overloading of the current systems. At least with structured higher density developments some form of recovery can take place due to the consolidated and measurable impact on supply services.
- Car Dependency
 - Car dependency remains a significant issue in all urban centres in Australia as our cities have evolved to be dependent on the automobile. This urban infill is no different and while the mantra of “transport-oriented development” has been circulated, the way the city is currently instructed and being developed people remain dependent on cars. The lack of a rapid transport network that is located close to all dwellings means that some sort of car will need to be available to service 24-hour needs. Although the developments along main roads in theory have bus access, the frequency of buses and hours of operation mean that cars are the only solution in many instances.
- Fire Hazard
 - In this specific Council with the areas of Darlington, Seacombe Heights, Seaview Downs and others backing onto the new Glenthorne Park which is increasingly becoming revegetated with native trees. Which is a good thing. It is probably not smart to build adjacent to this high-density light construction timber frame homes/veneer or board homes in the event of a fire with significant wind. It is preferable that adequate spacing remains between homes to enable fires to be contained and managed rather than burning through entire neighbourhoods as happened recently in California.
- Comparable Zoning
 - I cannot understand why with all of these common attributes for the hills face the area south of Seacombe Road is not being designed as in Pasadena with a minimum lot size of 700 m² or Bellevue Heights with a minimum lot size of 1200 m². Where they are essentially the same character and have been so since the suburbs were established.

- Preserve traditional suburbs at all costs.
 - Our traditional suburban environment is what Australians have been striving for, for over 100 years. The red brick soldiers' bungalows constructed following the First World War are an example of our tradition and what has made Australia what it is today. It is not London or New York or Sydney, it is not a European city with significant areas built to be serviced by foot traffic and horses. The majority of our cities and certainly Adelaide is a Suburban city designed to be serviced by cars. Simply creating urban infill does not change the nature of the need to be serviced by cars.
 - What we want to preserve is the ability of a family to enjoy a backyard where they can at least play, and children run around. We do not want to push these children onto screens or onto the streets. Creating a concrete jungle and restricting play will reap social costs to be borne by future generations for no real benefit currently other than profit.
 - Please ensure that we maintain our traditional affordable family suburbs with room for children and pets, trees, birds and cleaner air. This is what we have inherited as the Australian dream and this is what we have fought to preserve as a symbol of our freedom and quality of life. We should not be giving this up easily or without fight, and certainly not at the behest of unelected bureaucrats, or without this being tested through the power of the ballot box with a clear political position stated by those proposing to save our suburbs or destroy them.

Robert T Lloyd

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Seacombe Heights

SA 5047