



14 December 2020

PlanSA

DIT.planningreformsubmissions@sa.gov.au

Dear PlanSA

Re: Planning Code & Community Zone of the Burnside Development Plan at Alexandra Lodge, 46 Watson Avenue, Rose Park,

We write in respect of the public release of the Planning Code - Phase 3, concerning the Community Zone at Watson Avenue and Rose Park.

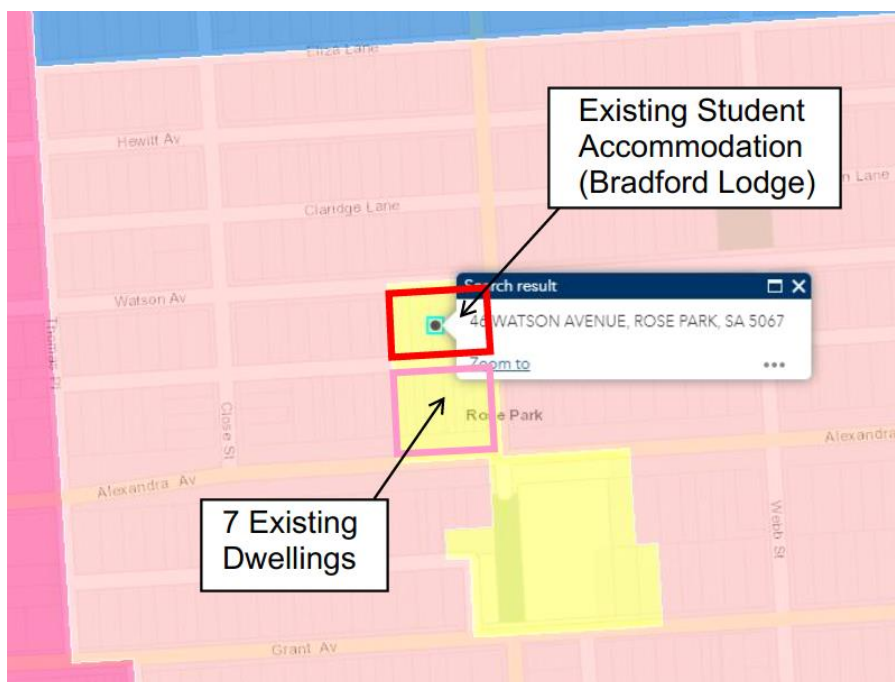
Alexandra or Bradford Lodge occupies a rectangular parcel of land of 3,101 square metres on which is constructed an 8-level accommodation building fronting Watson Avenue and a 2-level accommodation building, fronting, and on the corner with Victoria Avenue, together housing 109 students. The subject property has recently been subject to a resident's appeal against the approval of the City of Burnside for replacement of the student accommodation building with a lesser height residential apartment building(s). We were in favour of this proposal in order to achieve residential redevelopment. In accordance with the existing Community Zone the property is in transition to residential use. Adjacent allotments across Aviator Lane have already changed to residential use for dwellings.

Alexandra Lodge is pictured below.



It is proposed that the Community Zone transition to a Community Facilities Zone and a Neighbourhood Subzone. We are pleased to note that this release of the Code adopts the alternative residential use in the Subzone as below, properly encompassing the incongruous Alexandra or Bradford Lodge premises, which remain an eyesore in the locality.

Unfortunately we also note that the revision encompasses 9 residential lots, in 7 dwellings, that front Alexandra Avenue, which we believe should transition to the Established Neighbourhood Zone, presently Historic (Conservation) Zone, having been developed in accord with the alternate residential use provisions of the current Community Zone. This transition is in danger of faltering under the Neighbourhood Subzone detailed policies discussed below.



Property Details 🗖

**27 Alexandra Av Rose Park
SA 5067**

[More Details in SAILIS](#)

To view a detailed interactive property map in SAPPa click on the map below



Property Zone Details 🗖

Zone	Community Facilities
Local Variation (TNV)	Maximum Building Height (Metres) (Maximum building height is 12.5m) Maximum Building Height (Levels) (Maximum building height is 3 levels)
Overlay	Airport Building Heights (Regulated) (All structures over 45 metres) Heritage Adjacency Hazards (Flooding General) Local Heritage Place Prescribed Wells Area Regulated Trees
Subzone	Neighbourhood

Neighbourhood Subzone

Assessment Provisions (AP)

Desired Outcome (DO)

In respect of the neighbourhood Subzone, Desired Outcome we believe it would be preferable to retain the approach of the existing objectives for the Community Zone by replacing “complemented by” with “and” as corrected above. It is difficult to see how alternate residential of a high standard can complement community, education, and health land uses within the middle of an Historic (Conservation) Zone. Further the use of “and complement” in Performance Outcome PO1.2 below should also be struck out.

Please note the requirement for complementary built form and character is appropriately addressed in PO 2.1 and is not needed in DO 1 or PO 1.2.

Desired Outcome	
DO 1	Community, educational and health care land uses complemented by and residential development at medium densities as an alternative land use.

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 Development is associated with or ancillary to the provision of community, educational, recreational and / or health care services.	DTS/DPF 1.1 None are applicable.
PO 1.2 Residential land uses at medium densities that provide an alternative to and complement community, educational and health care facilities in the zone.	DTS/DPF 1.2 None are applicable. Insert: Dwelling Semi-detached dwelling Land Division Residential Flat Building
Built Form and Character	
PO 2.1 Buildings designed, sited and of a scale and appearance that complements the character and amenity of adjoining residential areas and buildings of heritage significance.	DTS/DPF 2.1 None are applicable.

<p>PO 2.2 Residential development that incorporates a high standard of architectural and urban design and sustainability.</p>	<p>DTS/DPF 2.2 None are applicable.</p>
<p>PO 2.3 Residential development constructed adjacent to a residential allotment in a neighbourhood-type zone:</p> <ol style="list-style-type: none"> 1. is of a bulk, height and floor space and provides a site frontage that complements the character and amenity of the locality 2. provides space around buildings to maintain and enhance the predominant character of the locality and provide opportunities for landscaping. 	<p>DTS/DPF 2.3 None are applicable.</p>
<p>PO 2.4 In areas where public or common open space would otherwise be deficient, residential development provides open space of a size and area sufficient to meet the recreational and lifestyle needs of residents.</p>	<p>DTS/DPF 2.4 None are applicable.</p>
Building Height	
<p>PO 3.1 Residential buildings of up to 3 storeys in height sufficiently set back from an existing dwelling in the zone, subzone or an adjoining zone to avoid detrimental impact on those dwellings due to the height, scale or bulk of the development.</p>	<p>DTS/DPF 3.1 None are applicable.</p>
Landscaping	
<p>PO 4.1 Development incorporates substantial landscaping of streetscapes and unbuilt spaces.</p>	<p>DTS/DPF 4.1 None are applicable.</p>

Community Facilities Zone

Assessment Provisions (AP)

Performance Outcome (DO)

The Community Facilities Zone however potentially extends the range of inappropriate uses well beyond that presently allowable in the Burnside Development Plan Community Facilities Zone.

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
<p>PO 1.1 Development is associated with or ancillary to the provision of community, educational, recreational and / or health care services.</p>	<p>DTS/DPF 1.1 Development comprises one or more of the following:</p> <ol style="list-style-type: none"> 1. Cemetery 2. Community facility 3. Consulting room 4. Educational establishment 5. Emergency services facility 6. Health care facility 7. Hospital 8. Indoor recreation facility 9. Library 10. Office associated with community service 11. Place of worship 12. Pre-school 13. Recreation area 14. Shop <p>This list prevails over the Subzone and require qualification by Inserting "Except in the Neighbourhood Subzone"</p>
<p>PO 1.2 Shops including restaurants are of a scale that is subordinate to the principal community use of land.</p>	<p>DTS/DPF 1.2 Shop gross leasable floor area does not exceed 250m².</p>
<p>PO 1.3 Offices are of a scale that is subordinate to the principal community use of land.</p>	<p>DTS/DPF 1.3 Office gross leasable floor area does not exceed 250m².</p>

Residential use is vital to the redevelopment of the subject property and essential in recognising 7 new dwellings recently established on adjacent land fronting Alexandra Avenue within the Community Zone.

It is requested that residential land uses which allow up to medium density be incorporated in the Neighbourhood Subzone, Land Use and Intensity DTS/DPF 1.1, as appropriate, and that the Community Facilities Zone DTS/DPF 1.1 exclude these uses, as inserted above to provide certainty of statutory interpretation.

Table 4 - Restricted Development Classification

The following table identifies Classes of Development that are classified as Restricted subject to any 'Exclusions'.

Class of Development	Exclusions
<p><u>Shop</u></p>	<p>Any of the following:</p> <p>(a) <u>shop</u> with a <u>gross leasable floor area</u> less than 1000m²</p> <p>(b) <u>shop</u> that is a <u>restaurant</u>.</p>

It is also requested that Table 4, Restricted Development Classification be expanded in the Neighbourhood Subzone to exclude those traditional community facilities that are desired in the broad Community facilities Zone, but which are clearly in conflict with adjacent residential use in the Subzone. These are primarily:

- shop of any floor area,
- office,
- hospital,
- consulting rooms

but should also exclude the very high intensity land uses comprising:

- Cemetery
- Community facility
- Educational establishment
- Emergency services facility
- Health care facility
- Indoor recreation facility
- Library
- Office associated with community service
- Place of worship
- Pre-school
- Recreation area

Conclusions

1. Alexandra Lodge is a residential use housed in an 8-level student accommodation building fronting Watson Avenue and a 2-level student accommodation building, fronting, and on the corner with Victoria Avenue.

It is an obsolete property in need of redevelopment to permanent residential purposes. Policy amendments are required to encourage residential not standardised community facilities.

2. In accordance with the existing Community Zone the property is in transition to residential use and should transition away from, not towards, intensive community facilities.

The Neighbourhood Subzone assists with this transition but requires refinement to achieve this goal.

3. Community Facilities Zone DTS/DPF 1.1 introduces many new high intensity, land use activities of high traffic generating capacity incompatible with the Established Neighbourhood Zone dwellings encircling Alexandra/Bradford Lodge, presenting a major departure from the existing development plan provisions and a very serious threat to the amenity of this locality.

This places residential uses within the zone, and adjacent locality, in land use conflict requiring amendment in the Community Facilities table to clarify that such uses are not accepted or satisfied in the Neighbourhood Zone.

4. Existing dwellings fronting Alexandra Avenue presently located in the Community Zone have been developed according to alternative residential uses.

Dwellings fronting Alexandra Avenue behind Alexandra Lodge should be included in the Established Neighbourhood Zone.

5. The expansion of the range of community facilities allowable in the new Community Facilities Zone, and so prevailing within the Neighbourhood Subzone, are of such high intensity and development yield that they may well prevent desired residential redevelopment, presently in transition.

High Intensity Community land uses need to be controlled/excluded in the Neighbourhood Subzone as shown in the table by the insertion of “Except in the Neighbourhood Subzone”, otherwise the general Community Facilities Zone list will prevail over the Subzone.

Yours sincerely

G L Bone