

18 December 2020

The Chair
State Planning Commission
GPO Box 1815
Adelaide SA 5001

By Email: dit.planningreformsubmissions@sa.gov.au

Attention: Mr Michael Lennon

Dear Mr Lennon,

Re: Submission – Revised Planning & Design Code (Phase 3)

We write on behalf of Chero Pty Ltd, that owns one (1) large land parcel located on Coromandel Parade, Craighburn Farm (refer *Figure 1* below).

The land parcel is formally described as follows:

- Lot 1092 in Certificate of Title Volume 6084 Folio 376.



Figure 1 – 136 Coromandel Parade, Craighburn Farm (Source: SAPP)

The site is the whole of the suburb of Craighburn Farm. The site is currently located within the **Residential (Craighburn) Zone** of the Mitcham (City) Development Plan (consolidated 20 February 2018).

Under the Planning and Design Code ('the Code'), the site is proposed to be zoned within the **General Neighbourhood Zone**. The site is not captured within a specific sub-zone. The site is also captured within the following Overlays:

- Airport Building Heights (Regulated) (All structures over 30 metres);
- Hazards (Bushfire – Medium Risk) (Medium);
- Hazards (Flooding General);
- Native Vegetation;
- Prescribed Wells Area;
- Regulated Trees;
- Stormwater Management; and
- Urban Tree Canopy.

Having reviewed the planning ordinance, proposed to apply under the Code, we note the following concerns:

- 1) 'Typical forms' of residential development are excluded from Accepted Development/Deemed to Satisfy Criteria due to Overlays which have been applied across the site.
- 2) Minimum lot sizes have increased for Group Dwellings (240m² to 300m²) and Residential Flat Buildings (200m² to 300m²) when compared to the existing policy framework.
- 3) The presence of a Bushfire – Medium Risk Overlay means that a Deemed-to-Satisfy pathway of assessment for residential dwellings is no longer available. This would cause all new residential developments to be unnecessarily subject to a Performance Assessment pathway, despite the requirements for residential dwellings for medium bushfire risk areas being well defined and documented in the Ministers Code and no referrals required to the Country Fire Service (CFS).

Proposed Amendments to the Planning and Design Code

- Minimum lots sizes for Group Dwellings and Residential Flat Buildings should be reduced to 240m² and 200m² respectively, to reflect the existing policy framework which applies to the site.
- Deemed to Satisfy (DTS) pathways for residential development, listed within the General Neighbourhood Zone should be reviewed and amended to ensure they are not diluted by the imposition of onerous Overlay restrictions (e.g., Bushfire – Medium Risk), which would unreasonably restrict simple and expected classes of development from following the DTS assessment pathway.

We would welcome the opportunity to meet with the Commission to discuss and further explain our position in relation to the matters identified above.

Yours faithfully,



Tom Simpson
Project Manager