

DIT:Planning Reform Submissions

From: Steve Hooper [REDACTED] >
Sent: Friday, 18 December 2020 2:29 PM
To: DIT:Planning Reform Submissions
Subject: Revised Planning & Development Code

Categories: leah

Hello,

Please disregard previous email and accept this as my submission below:

Please find herewith my submission in relation to the Revised Planning & Design Code released for public consultation until 18 December 2020.

I wish to express the following concerns:

1. Hills Neighbourhood zone

I note that the Hills Neighbourhood Zone replaces a number of Residential (Foothills) or Residential Hills Zones within various Council areas including Cities of Mitcham, Marion & Onkaparinga. This zone is a good replacement for the Development Plan Policies it replaces, in that it will:

- a) recognize that more generously sized allotments are required in hilly areas where the topography is a constraint;
- b) recognize that more generously sized allotments are required to preserve the natural character of the area, including maintaining abundant vegetation, open space, and a natural habitat for fauna;
- c) require more sensitive design solutions on sloping land as compared to residential areas on the Adelaide Plains.

I have observed that this zone applies to suburbs such as Seaview Downs, Seacombe Heights, Hallett Cove, Eden Hills and Bellevue Heights, but does not apply to most of Flagstaff Hill or Aberfoyle Park. In my view, these suburbs observe consistent characteristics with the aforementioned and should be zoned similarly.

I have spoken to Onkaparinga Council planning staff who have advised that the Commission does not propose to overlay the Hills Neighbourhood Zone within these suburbs as the current policy in the Development Plan is more akin to the General Neighbourhood zone and as such to undertake a conversion to the Hills Neighbourhood Zone would represent a policy change and the code is proposing instead to remain policy neutral.

I appreciate that Flagstaff Hill and Aberfoyle Park have different zones than the other suburbs I mentioned which lie within different Council areas. However, their natural character attributes are much the same. The assertions that the conversion cannot result in a policy change is understood in principle, but given the unprecedented and wholesale policy changes throughout the code in other aspects simply does not stack up. Put simply, these suburbs should be in a Hills Neighbourhood Zone and the policy framework contemplated within the General Neighbourhood Zone will destroy the natural character and result in housing densities that will compromise both natural vegetation and existing fauna and destroy the natural character.

2. Policy conversion is not like for like

Noting the above, I simply cannot accept assertions that the new Planning Code is policy neutral. One blatant example, is the changes in private open space for dwellings from generally 20% of site area or 80 square metres in conventional residential areas in the Adelaide Plains to a minimum of 24 square metres. This change (irrespective of whether it is good or bad policy) is a substantive change in policy approach. On this ground alone, you are changing the future character of neighbourhood's when you're dialogue with the community is that policy will remain largely the same. Aside from the policy change issue, the minimum 24 square metre private open space requirement is alarming and will lead to poor planning outcomes, including loss of vegetation, heat island effects, insufficient private open space, neighbour conflicts due to close proximity of boundaries, and insufficient stormwater disposal to name a few. I understand the policy writers consider that other provisions in the code will ensure there is sufficient open space around buildings (setbacks,

soft landscaping and the like). I do not accept that these provisions when considered together will lead to good planning outcomes. The ideology around 24 square metres as a minimum private open space requirements is flawed and should be abandoned for allotments of 300 square metres or greater, if not in its entirety. The private open space requirements should return back to good planning practice of around 80 square metres per dwelling.

3. Frontages for Group Dwellings/RFB's in a General Neighbourhood zone

The planning code requirement of minimum 15 metres frontages is insufficient. The frontage width should be a minimum of 18 metres to enable landscaping along driveways, space around buildings, and maneuvering areas. I have seen numerous examples where lesser frontages compromise the functionality and amenity for the development.

4. Urban Renewal Neighbourhood Zone

This zone seeks considerably higher densities than existing development where it is applied. The zone replaces the Urban Renewal Zone developed by a previous Government and which was introduced notwithstanding numerous concerns at the time from planning practitioners, relevant Council's, the Development Policy Advisory Committee and residents. Notwithstanding overwhelming concerns at the time, the relevant planning minister introduced the policy regardless. The zone will largely remain as is, notwithstanding the change in name. We are now seeing the outcomes of this policy framework in practice, and as expected it is resulting in very poor planning outcomes such as:

- a) developments dominated by hard paving;
- b) minimal private open space and minimal opportunities for soft landscaping;
- c) poor energy efficiency with a reliance on artificial heating and cooling;
- d) negative impacts on adjoining properties in terms of setbacks, overshadowing, bulk, scale, and density concerns.

I encourage policy makers to visit sites which have been developed under this zone and can provide examples if requested. Put simply, the planning outcomes are not a good legacy for those planners involved in the policy formation and a complete overhaul of the zone is warranted.