

City of West Torrens
Residential Zone
Policy Area 21 Low Density

General Neighbourhood Zone
Amend to
Suburban Neighbourhood Zone
(with TNV's)

I thank you for the ability to respond to the Draft Planning and Design Code and your consideration of the below submission,

On behalf of a number of property owners, inclusive of myself, located within Policy Area 21 Low Density of the City of West Torrens Residential Zone, I seek to object to the proposed rezoning transition of this land to within the General Neighbourhood Zone of the Draft Planning and Design Code. The particular locality within Policy Area 21 Low Density is that area between Pine Avenue, Glenelg North and McCann Avenue, Glenelg North.

The approach to this rezoning proposal is misinformed and in no way reflective of the existing zoning parameters. As the Policy Area naming suggests this Policy Area is low density in nature and character, with existing allotments enjoying frontage widths in the order of 18 metres. Existing zoning parameters seek a minimum allotment size of 420m² and minimum frontage of 12 metres except where located within 400 metres of a centre zone. The particular locality outlined above is located approximately 600metres from a local centre at its closest point, noting that this does not provide for supermarket facilities.

The proposed General Neighbourhood Zone seeks to allow minimum allotment sizes of 300m² and 9 metre frontage widths for detached and semi-detached dwellings, with allowance also for 200m² allotments for row dwellings or detached dwellings in a terrace arrangement with a 7 metre frontage. It is noted that such parameters can be reduced further within a deemed to satisfy assessment if considered acceptable by a private certifier. The General Neighbourhood Zone further seeks to introduce battle axe allotments into the locality, an allotment type not evident at all within Policy Area 21. Such policy changes are at major variance to current policy, resulting in significant impact to the densities and character currently enjoyed by this locality.

It is understood that the Department has taken an approach in which any land located within the Rescode mapping area is to be transitioned to a General Neighbourhood Zone. Again this is not an appropriate consideration in this instance as a Rescode application must still meet the applicable minimum allotment sizes stipulated within the development plan, being 420m². It further appears that those areas identifying a current minimum allotment size of 450m² and less appear to have been transitioned to a General Neighbourhood Zone, and 450m² and above to a Suburban Neighbourhood Zone. Policy. Policy Area 21 at 420m² lends itself to a Suburban Neighbourhood Zone as opposed to the 200-300m² parameters of the General Neighbourhood Zone.

A typical Development Plan Amendment process as outlined by the Department requires an analysis to be undertaken to justify the proposed changes. The proposed rezoning transition which seeks significant changes to existing zone parameters, and associated densities provides no such analysis. A simple desktop analysis indicates that the relevant portion of Policy Area 21 provides for no pit and pipe stormwater infrastructure, relying on overland

flows which are unable to cater for additional density. An analysis of walkability outlines that the closest supermarket is over 1.2km from sections of Policy Area 21.

Additionally a Development Plan Amendment must accord with the principles within the 30 year plan for Greater Adelaide. This document does not identify Policy Area 21 as a future growth area, nor envisages greater densities within this locality.

Whilst affordable housing is argued for the purposes of densities, this is not the outcome identified along the coast, with older somewhat affordable housing stock being demolished and replaced with two brand new dwellings at a higher price bracket.

Michael Lennon, Chair of the State Planning Commission has provided advice that any zoning which is not reflective of current policy is likely an error. Accordingly we seek for this error to be corrected. It is suggested that as an alternative to the proposed General Neighbourhood Zone, that Policy Area 21 Low Density of the City of West Torren's Residential Zone be amended to a Suburban Neighbourhood Zone with the application of a Technical Numerical Variation Overlay outlining a minimum allotment size of 420m² and minimum frontage width of 12 metres.

Additionally for the purposes of the Suburban Neighbourhood Zone, the definition of low density within the draft code must be amended. The current definition seeks less than 35 dwelling units per hectare resulting in allotments at 285m² (gross density) and even less at net density. For the purposes of the Suburban Neighbourhood Zone this should be defined as less than 22 dwelling units per hectare (gross). With the definition of density further referring to net density, it must be made clear that the density definitions are referencing gross density.

Please feel free to contact me should you wish to discuss the contents of this submission in greater detail.

Matt Dineen

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