
From: Lynch [REDACTED] >
Sent: Friday, 28 February 2020 4:38 PM
To: DPTI:Planning Reform Submissions
Subject: Objections to Planning and Design Code as noted below.

To whom it may concern, Dear to whom it may concern.

SUBMISSION ON PLANNING AND DESIGN CODE.

In response to the draft Planning and Design Code – phase three, I wish to register my strong objection in relation to the issues outlined below. I have also indicated several practical ideas in the text below.

I, Robert Gary Lynch, currently reside at [REDACTED], Mile End, with City of West Torrens residential zone Cowandilla / Mile End Character Area 23.

The 'like for like' zone in the planning reforms is the "Suburban Neighbourhood Zone," with character overlay. See Figure 1 below.

Zoning change and area character impacts on my efforts to maintain character consistency of the site and is an insult to my investment in time and money spent on the site and rates and taxes paid.

1. As part of the proposed reforms, it is proposed that parts of Mile End, where I live and Torrensville, Cowandilla and Hilton, be rezoned as 'Housing Diversity Neighbourhood Zone'. Character area 23 is consistent with Suburban area zone, for example as on the north side of Henley Beach Road and Thebarton, having similar history, heritage and character, compared to Cowandilla and Hilton, where there are many less examples of like for like architecture, and more medium density housing.
2. The intent of the current zone is that blocks will be low-very low density. This is inconsistent with the objectives of the 'Housing Diversity Neighbourhood Zone', which states that this area may apply to existing medium density policy areas. I have not been able to obtain justification for this decision.
3. The current zone clearly states that the area will be comprised predominately of detached and semi-detached dwellings. This does not match with the objectives of the 'Housing Diversity Neighbourhood Zone', which provides replacing existing dwellings with medium density housing, primarily in the form of terrace housing, group dwellings or residential flat buildings.
4. Residents who are able, choose where they want to reside. In my case, this has been for convenience to the CBD and my workplace and because of my respect for the history of the area. I appreciate the diversity of cultures and the creative and friendly nature of neighbours.
5. Currently this area is bicycle and pedestrian friendly. I travel mainly by these means. Changes to the zoning may have an impact on this.
6. Note that [REDACTED], Mile End was of a very substandard nature when my wife and I bought it.

7. As with many other local residents, I have invested time, energy and money at my residence, to maintain quality and cohesiveness of the housing era of my house which is significant to the establishment of Mile End as one of the first “garden suburbs” of Adelaide.
8. Restoration which has included woodwork, stonework, brick work, stained glass. Copying and installing of these items which have been destroyed or decayed has been done.
9. Historically appropriate re- roofing.
10. Historically appropriate front fencing.
11. Use of heritage colour schemes, both externally and internally, often by finding previous paint colours by paint removal etc.
12. It should be noted that the area of Mile End where I live documents the transition of Australia moving from the Victorian era to the Federation era. When old houses here are demolished this documentation is lost.
13. Updating the plumbing, wiring, gas and electrical system.
14. Building an extension that has incorporated many reclaimed architectural items.
15. Availability of natural lighting has been increased in my house.
16. Sustainability features. For example,
17. Installing several rainwater tanks. The use of this tank water enables our household to minimise the use of tap water, reduce soil salinity and greatly reduce the amount of storm water flowing into local beaches.
18. *Extensive use of passive cooling techniques by planting more trees and shrubs. Extensive use of insulation.
19. Planting of native vegetation has encouraged the return of native birds. Bee activity has increased markedly.
20. Installation of solar panels.
21. The character of Mile End where I live has already been eroded due to inappropriate construction and approvals which do not appear to comply with the character area. It is more appropriate to have a ‘like for like’ zone of Suburban Neighbourhood Zone.
22. I have appreciated from a tourist’s point of view, the cities around the world which maintain character housing, often around the city ring. This seems to bring tourists and income to these areas. Adelaide could invest in this more. Higher density housing cannot replace the character dwellings of this area of Adelaide, as evidenced by new high rise building examples allowed in local streets such as 2 Rankine Road Torrensville, which are completely in opposition to the look of the local area.

Modification of existing housing stock to increase the number of dwellings per hectare and reduce the size of allotments should be discussed further; impacts include climate, families, noise, traffic, infrastructure

1. This has already occurred in a significant number of properties in our block and the larger block of character area 23. However it has occurred at the cost to the local environment. Most of the modifications have poured concrete throughout, not only adding to the heat effect but further reducing amenity and reducing suitable habitat for local flora and fauna such as birds. This has a knock on effect as e.g. children often now have to be formally taught about nature and also have fewer play areas.
2. Estimations are that families travelling from outer suburbs to work spend large amounts in travel. Perhaps there are best examples for families to have additional dwellings on a larger block, which could lead to a ‘pooling’ of resources. Impacts would need to be addressed, and factors would need to be understood, including safety, garden space, rainwater availability, noise, parking, provision of shade trees on the block, pets.
3. How will additional dwellings affect solar panels, ability to source sunlight, and electricity costs? What effects will there be on sunlight and shade?
4. Health research shows benefits to health and mental health, including in children, when sufficient space is available to be active. A barrier to being active is the lack of suitable

provision of space at home, and especially where there is also a lack of suitable and safe outdoor play space.

5. Additional dwellings will require additional room for vehicles. Currently our street includes a community business, with many vehicles and trucks using the street to obtain and deliver goods throughout the week, causing pressure on parking and difficulties with safe access for local residents on busy days. On a number of occasions trucks have parked across my driveway. An increase in dwellings to 70 dwellings per hectare is an unviable solution, and businesses within the residential zone should only be small scale, safe and not impact on amenity nor have priority above residents, or block access in the street.
6. Currently rubbish on the footpaths, roads etc. is a major problem. This problem will increase with the increased population and business
7. Suggestion has been made that more people may work from home. How will this impact e.g. car parks, infrastructure and communication methods? There are many factors to consider if raising the dwelling numbers to 70 per hectare.
8. Allowing more business to be in residential areas will present increased risk of fire, residents being exposed to harmful substances. More rubbish, noise. Parking difficulties. Visual pollution. Reducing the value of residents' houses.

Planning reform may have insufficiently garnered feedback and may impact vulnerable members of the community: It is imperative that all reaches of the community are adequately informed.

1. Departments need to continue to work together and obtain qualitative research from the community.
2. I have not been well informed, having only delved into this on advice from concerned neighbours. I still feel under-informed, and am working from Council handouts as a more practical means to understand implications.
3. Community information must be presented in plain English and in several different ways, to demonstrate a fair and reasonable approach. Communication and feedback should be via a number of methods – relevant to the demographic. For example, presentations to groups, letterbox drop, internet, library mail, radio interviews, TV grabs. Planning SA states this is a huge reform. Invest the time so as we all understand to avoid lack of trust and negative views.
4. Information must be provided in all community languages as relevant.
5. The demographic of the community includes elderly – many whom are not using or do not own a computer or smart phone.
6. Some people may be illiterate in English. How will they be kept up to date?
7. Some residents are ill – time is required.
8. People living with disability may require extra time to take on the information, and may have to rely on relatives and friends to assist. Written information should be in Font 13 Arial.
9. Ultimately people make voting decisions.

A reduction in allotment size and increase in dwellings will impact on local environment climate and diversity and requires urgent attention; may also impact Budget

1. Government departments need to continue to work together to enable healthy communities.
2. Infill development greatly puts significant and regulated trees at risk. Loss of trees increases health risks such as melanoma, heat stress, respiratory conditions and worsening of ill health for example in respiratory conditions. This will impact the already overstrained health Budget.

3. Loss of diversity of flora and fauna should be a priority and solutions must be found, not overlooked.
4. Increased density requires additional availability of green space to assist in overcoming heat zones, shown by research to have increased with infill development. <https://data.environment.sa.gov.au/Climate/Data-Systems/Urban-Heat-Mapping/Pages/default.aspx>
5. Infill development has typically not been required to install suitable green amenity to overcome heat thrown up by concrete, paving and so on. An alternative could be to recover from all existing land owners a percentage of land at the rear of properties to build a green buffer to add to street trees. Additionally more street trees need to be planted, including at the front of all businesses, as businesses comprise a significant total of buildings in the City of West Torrens. Has this been factored into the planning?
6. The Urban Heat Mapping project in 2017 in the City of West Torrens pointed out there are vulnerable communities, including people from non-English speaking backgrounds, who may need assistance in adapting to hotter areas, such as those of higher density housing.
7. Any further infill requires urgent attention prior to proceeding. Events in Australia have upscaled the urgency of multi-departmental collaboration to overcome loss of environment for future generations and minimise loss of investment.
8. Adelaide has numerous ugly derelict sites currently. The development of these sites is surely more important than ruining heritage areas such as all areas of Mile End.

Additional:

Figure 1: Character Area 23 with the black outline – but the character is well preserved overall and the same as the other pink areas deemed to be Suburban Neighbourhood. Further consideration requested.



Thank you for the opportunity to submit my objection. Please do not hesitate to contact me if required to obtain clarification.

Yours sincerely

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