

From: [DPTI:Planning Engagement](#)
To: [DPTI:Planning Reform Submissions](#) FW:
Subject: P & D Code submission Wednesday, 8
Date: January 2020 1:52:44 PM

From: James M [REDACTED]
Sent: Wednesday, 8 January 2020 1:30 PM
To: DPTI:Planning Engagement <DPTI.PlanningEngagement@sa.gov.au>
Subject: P & D Code submission

To whom it may concern

I wish to register my strong objections to the rezoning of our property at [REDACTED] Mile End, to the Housing Diversity Neighbourhood Zone under the proposed Planning and Design Code currently out for public consultation.

Our property is currently situated within the Residential Zone, specifically Cowandilla / Mile End West Character Policy Area 23 of the West Torrens Council Development Plan.

The prescribed desired character for this area envisages development predominantly in the form of detached and semi-detached dwellings on allotments of low to very low density, configured to reinforce the existing allotment pattern which is identified as a "*significant positive feature of the policy area*".

The prescribed desired character for this area references a unity of built form, where "*all new development is complementary to the key character elements of Victorian-era villas, cottages, inter-war bungalows, Spanish mission and Dutch colonial-style dwellings, rather than dominating or detracting from them*".

Among the key elements identified, the Development Plan policies emphasis single storey development, or two storey development designed in a manner that is complementary to the single storey character of nearby buildings. Retention and preservation of street trees is also identified as an important streetscape attribute worthy of protection.

The desired character prescribed in the Development Plan is highly reflective of the established on-ground reality throughout the policy area and this is particularly the case in relation to the stretch of Bagot Avenue between Hounslow Avenue and Henley Beach Road where there is a high degree of consistency in dwelling form, scale, density, configuration, orientation and style.

This is perhaps most visible on the western side of Bagot Avenue, where development is comprised almost exclusively of single storey detached dwellings of consistent scale on individual allotments at low density. This low density character is supported by the current land use and subdivision policies of the policy area, which envisage detached and semi-detached dwellings on allotments of greater than 270 square metres to the east of Bagot Avenue and 340 square metres to the west of Bagot Avenue.

By comparison, the proposed content of the Housing Diversity Neighbourhood

Zone is significantly at variance to both the established and desired character of Cowandilla / Mile End West Character Policy Area 23.

Nowhere is this divergence more evident than the Site Dimensions and Land Division policy DTS/DPF 2.1 – “*Development achieves a net residential density of up to 70 dwellings per hectare.*” This equates to a new subdivision requirement of approximately 142 square metres per dwelling, which enables a dramatic escalation in local housing density that is both inappropriate and ill-suited to this policy area. An example of just how extreme this proposed change actually is, under the current policies I am unable to subdivide our property.

Under the proposed policies of the Housing Diversity Neighbourhood Zone I can almost fit four individual dwellings on my land. When you consider the accumulative consequences of a 70 dwelling per hectare subdivision requirement throughout this location against the on-ground such proposed policies cannot be considered orderly town planning in my view. This is the case in terms of the loss of distinct local character through the replacement of existing low density housing stock with medium-to-high density development, but also in terms of the unmanageable traffic implications of introducing additional dwellings along one of Mile End’s busiest local road networks.

On the specific issue of traffic management, it should be noted that Bagot Avenue is already congested throughout the day as vehicles travel between Henley Beach Road and Sir Donald Bradman Drive, such that existing residents I am in communication with are becoming increasingly concerned about safety when exiting properties onto Bagot Avenue. In the morning peak hours in particular it is becoming increasingly difficult to reverse out onto the street without disrupting the free flow of traffic and the speed and frequency of vehicles has become a genuine concern for personal safety, noting the number of households in the street with small children.

For these reasons and to preserve the character and liveability of the local area I strongly recommend replacing the application of the Housing Diversity Neighbourhood Zone with the Suburban Neighbourhood Zone + Character Overlay. This would enable the use of Technical Numeric Variation Overlays that align with the current subdivision policies and ensure new development within the Cowandilla / Mile End West Character Policy Area 23 is undertaken in a manner that is compatible with the established and desired character currently envisaged by the Development Plan.

I trust the concerns detailed above will be afforded due consideration.

Regards

James Moss

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