

27 February 2020

Minister for Planning
Stephan Knoll

Email : ministerknoll@sa.gov.au

Dear Minister Knoll

PLANNING & DESIGN CODE - PHASE 3 (Alexandrina Council Area)

I live within the Alexandrina Council district.

In response to the draft Planning and Design Code – Phase 3, which is currently out for public consultation, I wish to register my strong objections to a number of issues as summarised below.

My specific comments follow:

1. General Neighbourhood Zone

The draft Code places most of Alexandrina Council's residential zones in the General Neighbourhood Zone. The policy in this new zone is entirely at odds with current zone policy and allows for a far greater intensity of development than existing.

I do not agree that the proposed General Neighbourhood Zone is consistent with the residential character of the Residential Zone, Policy Area 11 nor within the context of Port Elliot and Middleton as tourist destinations and historic coastal settlements. This is because the current Residential Zone focuses on preserving character, rather than accommodating change and infill, and does not envisage a greater range and intensity of development than currently exists.

I request that at a minimum, you move all residential areas to the Suburban Neighbourhood Zone with technical and numeric variations (TNVs) to match existing conditions.

2. All Existing Residential Areas

- Non-Residential land use: Currently in Alexandrina Council's residential areas, shops, offices and educational establishments are non-complying. In the new Code existing residential areas will allow these non-residential uses which will adversely impact traffic, parking, noise, neighbour's amenity and the character of our suburbs. This is unacceptable. All uses which are currently non-complying in our residential areas (e.g. office and shop) should be "restricted development".

- Siting and Setbacks: Under the Code, building setbacks from side and rear boundaries will noticeably decrease, particularly at upper levels. This is unacceptable and will severely impact amenity and privacy in Port Elliot. Existing siting, setback and floor area criteria should be maintained throughout all our residential areas.
- Density and Allotment Sizes: I do not agree with decreasing existing minimum allotment sizes and frontage widths. It is important that current minimum allotment sizes, heights and frontage widths match existing.

3. Historic Area Statement

The lack of identification of Contributory Items in the Code, by either a map or list of addresses, will create uncertainty and confusion for owners, prospective buyers, neighbours and developers. I do not agree with removing protection and lack of inclusion of all Contributory Items. Existing protections and clear spatial identification of Contributory Items on a map should be retained.

I have specific concerns with regards to the Port Elliot Historic Area Statement O2406 (Alex 5) and the Middleton Historic Area Statement O2406 (Alex 3), as follows:

- the generic introduction makes no reference to the Historic Area Overlay being described, so that no context is provided about the historic background and development pattern, nor our townships' heritage values,
- the map provided is grossly basic without any detail such as street layouts/ subdivision patterns, already listed local and state heritage places,
- there is inconsistency in mapping style of the proposed Historic Areas. Alexandrina Council's existing Development Plan maps are far better, and should and could be adapted to replace the minimal, inadequate mapping provided,
- the Historic Area Statement table has no title and no headings apart from "Eras and Themes", and it is not clear what is the function of the table? This needs to be clarified for it to make sense,
- it would appear that the development objectives and/or policies have been omitted from the new Code, which will result in very minimal, vague and subjective guidance with regards to future development in in our townships, and
- I found the terminology used in the Code in relation to heritage difficult to follow and quite inconsistent, with terms being used interchangeably.

4. Public Notification

I do not agree with the removal of public notification to neighbours for all proposed development, nor the removal of right of response and appeal. The Code should reflect Alexandrina Council's current Development Plan policy with respect to the notification of neighbours and the public.

5. Impact on Infrastructure and Essential Services

I am concerned that the potential rate and intensity of new development which will be facilitated through the proposed Code policies, could place existing CWMS infrastructure, especially roads and stormwater systems, under stress.

6. Tree Canopy and Climate Resilience

The draft Code facilitates larger developments and the easier removal of trees on both private and public land. This will result in a significant reduction in canopy cover, habitat loss and climate resilience, due the increased infill development opportunities, reduction in minimum site areas, site coverage and setbacks.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns which are shared by many residents, there will be an unacceptable loss of local character and amenity in our townships in the Alexandrina Council area. Once amended, the draft Code should be put back out for further community consultation.

I trust that the concerns detailed above will be given your full consideration.

Yours sincerely



Neil and Alison Philp

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PORT ELLIOT SA 5212

Email : ████████████████████