

26 February 2020

Ground Floor,  
89 King William Street  
GPO Box 2403  
Adelaide SA 5001  
PH: 08 8221 5511  
W: [www.futureurbangroup.com](http://www.futureurbangroup.com)  
E: [info@futureurbangroup.com](mailto:info@futureurbangroup.com)  
ABN: 34 452 110 398

Mr Michael Lennon  
Chairman – State Planning Commission

By email: [Dpti.planningreformsubmissions@sa.gov.au](mailto:Dpti.planningreformsubmissions@sa.gov.au)

Dear Michael

**RE: PLANNING AND DEVELOPMENT CODE SUBMISSION – LOT 707  
MARION ROAD BEDFORD PARK**

We write on behalf of the Indigenous Land and Sea Corporation (ILSC) which is the registered owner of land located at Lot 707 Marion Road, Bedford Park. The location of the land is identified by Figure 1 below.

**Figure 1: Lot 707 Marion Road, Bedford Park**



 SUBJECT LAND



The ILSC is a corporate Commonwealth entity established under the ATSI Act and subject to the PGPA Act. The ILSC assists Aboriginal and Torres Strait Islander people to realise economic, social, cultural and environmental benefits that the ownership and management of land, water and water related rights can bring.

The ILSC provides this assistance through the acquisition and management of rights and interests in land, salt water and fresh water country.

The ILSC's primary governing legislation is Part 4A of the [Aboriginal and Torres Strait Islander Act 2005](#).

The ILSC has priority outcomes for achieving Indigenous benefits:

1. **Access to and protection of cultural and environmental values:** The ILSC recognises the importance of land to Indigenous people's cultural identity. We are committed to assisting Indigenous people acquire and manage land of cultural and environmental significance, and to protecting and maintaining the cultural and environmental values of land.
2. **Socioeconomic development:** The ILSC assists projects that deliver social and economic outcomes for Indigenous Australians. Priority is given to projects that provide sustainable employment and training that leads to employment. The ILSC believes that sustained employment creates a range of benefits for Indigenous people, including increased standards of living, income and improved health and wellbeing.

The Marion (City) Development Plan identifies that the land is currently located within the Suburban Activity Node Zone. The key objectives of the zone state the following:

1. *A zone that includes a range of medium and high density residential development supported by a mix of compatible land uses.*
2. *Well designed and functional mixed use areas with a walkable urban form, pedestrian and cyclist friendly streetscapes, and active street frontages that facilitate personal interaction and promote public transport use.*
3. *The design and layout of development to encourage walking and cycling and promote public transport use.*
4. *A mixed use area with a variety and concentration of activity close to a key focal point such as a fixed transit stop, activity centre or high quality open space.*

The land is further located within an area known as Laffers Triangle. The desired character for this area states:

### ***Laffer's Triangle***

*Laffer's Triangle will be developed as a predominantly medium to high density residential area with land uses adjacent to the Warriparinga Wetlands designed and sited to maximise the outlook over the wetlands and open spaces. Land uses in this locality will include aged care accommodation.*

*Non-residential land uses are encouraged along the Marion Road frontage and will be designed to integrate with residential development within the area.*

*The number of access points to Marion Road will be limited, with access to individual sites achieved through service roads, internal driveways and shared parking areas.*

Envisaged land uses include:

- *advertisement*
- *affordable housing*
- *aged persons accommodation*
- *all forms of development that are ancillary to and in association with residential development*
- *community centre*
- *consulting room*
- *dwelling*
- *educational establishment*
- *office*
- *pre-school*
- *recreation area*
- *residential flat building*
- *shop or group of shops, other than larger scale bulky goods outlets that exceed a maximum gross leasable floor area in the order of 250 square metres*
- *stormwater detention/retention basin*
- *student accommodation.*

The ILSC has a development vision for the land which is consistent with the expectations of the Suburban Activity Node Zone. Negotiations are underway with development partners to assist in achieving the development vision.

The draft PDC seeks the establishment of an Urban Neighbourhood Zone. From a land use perspective, the zone is similar in intent to the Suburban Activity Node Zone and is therefore supported by the ILSC. In particular, we concur with the mixed used expectations of the zone.

In our submission, it is critical that PO 1.6 and DTS/DPF 1.6 be retained, as such provides for a significant retail node which will support the anticipated residential development outcomes.

In terms of suggested amendments, we ask that the following procedural matters in relation to public notification be considered:

- that given the significant separation to potentially sensitive uses, that the need to notify development proposed on the land be removed.

We would be pleased to further meet with DPTI staff in order to provide further detail in respect to this submission/request.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Mj".

**Michael Osborn**  
National Planning Manager