

28 February 2020

Reference: 0216-01

**Attention: State Planning Commission**

By Email: [DPTI.PlanningReformSubmissions@sa.gov.au](mailto:DPTI.PlanningReformSubmissions@sa.gov.au)

## **DRAFT PLANNING AND DESIGN CODE – PHASE 3 (URBAN CODE)**

### **CONSULTATION SUBMISSION**

We act for Land Vision Group and Platinum Property Retirement Pty Ltd in respect of their site at Lots 61 and 62 Horrocks Highway, Roseworthy (CT 6185/327 and CT 6185/328).

The subject site is approximately 68 hectares in area and is currently being developed as a master planned residential community and associated town centre. It sits at the centre of a new community that is envisaged to comprise more than 4,000 dwellings and 10,000 residents upon completion. Under the current zoning, residential development at a range of densities and a Neighbourhood Activity Centre, incorporating a wide range of residential, commercial, retail, community, recreation and educational facilities, are accommodated within the Suburban Neighbourhood Zone.

The subject site represents the designated location for the Neighbourhood Activity Centre to serve Roseworthy and the surrounding locality.

We express our grave concern that the proposed General Neighbourhood Zone fails to capture the breadth of land uses intended to be located on the subject site and, in particular, fails to recognise the importance of the centre being developed to serve the wider locality. Already, Coles have been secured as the major supermarket anchor for the shopping centre, Trinity College have committed to establish a school campus as part of the centre and the major oval and recreation precinct form part of a current application before Council. Discussions are also advanced in respect of a medical centre and community facilities.

The proposed General Neighbourhood Zone fails to capture the breadth and scale of development intended for this Activity Centre and will effectively condemn Roseworthy to become a dormitory suburb without a community heart. By way of example, the current zone envisages an Activity Centre with up to 8,000m<sup>2</sup> of retail floorspace, while under the proposed zone, a shop of 1,000m<sup>2</sup> or more is a restricted form of development. This is completely unacceptable. The subject land should be zoned "Master-planned Suburban Neighbourhood Zone". This zone recognises the scale and breath of centre required to support a major new community of 10,000 residents and provides for greater flexibility in the design criteria applying to both commercial and residential development.

Furthermore, the General Neighbourhood Zone fails to recognise the desirability of increased densities around the activity centre and implies a blanket two storey height limit, 5 metre setbacks to primary road frontages and a range of criteria that envisages low-rise, low-density suburban neighbourhood. The current Suburban Neighbourhood Zone applies policies appropriate to the development of an

integrated low-medium density development reflecting the subject site's mixed land use intent.

We implore that the proposed General Neighbourhood Zone is replaced with the Master-planned Suburban Neighbourhood Zone over the subject site and thus captures the proposed Activity Centre and immediately surrounding development.

In the event that the State Planning Commission does not impose the Master-planned Suburban Neighbourhood Zone over this site, we suggest the following as an alternative, albeit less desirable, approach:

- Apply an Urban Activity Centre Zone to the area identified on the attached plan. The area has already been defined by way of a land division application and includes the proposed commercial site, school site and recreation site that form the heart of the new Roseworthy community; or
- As a much poorer substitute, amend the exclusion in the Restricted Development Classification applying to a shop to read "With a gross leasable area less than 1,000m<sup>2</sup> other than where an activity centre is identified on a relevant Concept Plan (in this case Concept Plan Map Lig/13), in which case a shop is not a restricted form of development"; and
- Introduce greater clarity with respect to Performance Assessed proposals by:
  - » Removing the DTS from the Assessment Provisions and insert them into Table 2 (similarly to the way Classification Criteria are used in Table 1);
  - » Delete DPF from the Assessment Provisions and Procedural Matters such that performance assessed development is on its merits; and
  - » With the removal of DTF altogether, remove the last paragraph under "Rules of Interpretation: Policies – Desired Outcomes and Performance Outcomes" and replace it with the following: "Performance outcomes do not need to meet a DTS. A DTS represents only one way a PO might be met".

We would be pleased to be heard in respect of this matter.

Yours sincerely



**Stephen Holmes**

Director

*Encl.*