

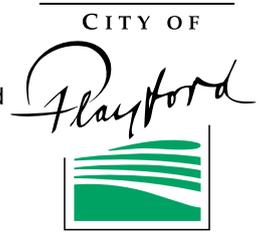


FROM THE OFFICE OF THE MAYOR

Enquiries: Glenn Docherty
Telephone: (08) 8256 0188
Email: MayorDocherty@playford.sa.gov.au

VISIT
Playford Civic Centre
10 Playford Boulevard
Elizabeth SA 5112

Stretton Centre
307 Peachey Road
Munno Para SA 5115



Minister for Planning
GPO Box 1533
ADELAIDE, SA, 5001

Dear Minister

Planning and Design Code Consultation

The City of Playford is providing comprehensive comments to the Department of Planning, Transport and Infrastructure and the State Planning Commission in response to the period of consultation and would like to bring to your attention a range of matters with regard to the Code and related opportunities.

Playford is supportive of the overall thrust of the new Planning Development and Infrastructure Act and Planning and Design Code. However, there is a range of opportunities presented by the Code and also a range of areas where there is potential for improvement that are appropriate to highlight for your attention.

The strengths of the system which are particularly noted by Playford include:

- Introduction of an e-planning system to access the new Code
- A consistent approach to planning policy across the State
- A facilitative approach to development resulting in continued growth and alignment with Councils Strategic Plan, consistent with Council's strategic objectives
- A reduction in non-complying equivalent forms of development
- The introduction of additional land use definitions

The opportunities presented by the new Code where Playford would like to work with the State Government include:

Defence precinct:

The Adelaide City Deal and the introduction of the new Planning and Design Code present an opportunity to develop a defence precinct in the City of Playford. There is a need to identify and zone a suitable area in close proximity to the RAAF Base Edinburgh and Greater Edinburgh Parks. Playford would appreciate the opportunity to work closely with the State in pursuing this important initiative.

Riverlea development (Buckland Park)

There is considerable uncertainty about the future of the Riverlea development and likelihood of it proceeding. Riverlea was declared a major development and has been rezoned for approximately 10 years. Circumstances have changed since the original rezoning and there is now a very long term zoned residential land supply in the City of Playford and northern region of Adelaide. There is particular concern about the ability to properly coordinate the infrastructure and development of this large area which has a potential population of 30,000 people and 12,000 dwellings if the current developer were not to proceed with the development. The arrangements in place for infrastructure

provision and coordination are substantially different to those established for the more recent Playford growth areas. There is a need for careful consideration of options for zoning and development of this extensive area before such circumstances eventuate.

The following is specific comment in regard to some key issues related to the transition to the Code:

Playford Health Precinct

The Playford Health Precinct, which is adjacent the Lyell McEwin Hospital, is an important initiative of the City of Playford. It offers the potential to improve the range of health services, establish a health and innovation cluster and provide employment to the Region.

It is noted that the Playford Health Precinct DPA is currently with you for approval. The transition of the DPA and current Suburban Activity Node Zone policy into the Code is of considerable importance. It is noted that there is the need to ensure an appropriate transition to enable the development of shops into the precinct, noting that within the new Innovation Zone there is a Restricted development limitation on shops of 500 square metres, which may unnecessarily limit the scope for development in the precinct. The Health Precinct incorporates a former Neighbourhood shopping centre and development of greater than 500 square metres is already present and expected to continue to develop.

Elizabeth Regional Centre

Playford is generally comfortable with the designation of the current Elizabeth Regional Centre as an Urban Activity Centre, as the equivalent zone under the new Planning and Design Code. It is noted that portions of the centre are proposed to be transitioned to other zones including Innovation Zone, Community and Open Space Zone. The introduction of the Innovation Zone is considered to be entirely consistent with the current range of activities and desired activities in these areas to the north and south of the core of the centre.

The proposed Community and Open Space Zones are not favoured transitions as they may potentially unduly limit the range of activities in these areas which are part of the core of the centre. The Urban Activity Centre zoning is considered appropriate and more consistent with the current Regional Centre zoning of these areas.

Centres hierarchy and ‘out of centre’ development

A broader concern is that with the ‘flattening’ of the centres hierarchy, there may be a decreased emphasis and ability to focus a broad range of services, facilities, commercial and retail development in centres such as the Elizabeth Centre in conjunction with the established superior public transport facilities and infrastructure. This concern is further underlined by the general trend in the Code to allow more development of shops outside of activity centres. While it is understood that there is a desire to enable increased competition, there is also a need to balance this need for competition with the potential impact on existing and future development of centres. We are not establishing most of our urban areas from scratch and there is an evolution/transition required. It is not a community benefit to potentially see the deterioration or stagnation of existing centres through out-of-centre development.

It is contended that the extent of potential to develop new shopping development, for example on main roads in the new Employment Zone and Suburban Employment Zone will have significant potential to impact existing centre and shopping development. This is an issue which in ordinary circumstances would undergo detailed analysis through investigations if undertaken as a Development Plan Amendment. However, the sweeping changes proposed may have large impacts without detailed analysis of the likely implications.

Mingari Street development

The proposed new Suburban Employment Zone is to replace the current Commercial Zone for the 'Mingari site' at the corner of Curtis and Main North Road Munno Para. This is a site owned by Council which was rezoned relatively recently in June 2017. While generally satisfied with the new Zone, one specific matter is noted and change is sought.

The Council's DPA provided a limitation on shop development at 1500 square metres (as a principle of development control) for the whole site, so as not to enable large activity centres / large supermarkets on this site. This was a deliberate initiative given the extent and number of centres in the immediate vicinity and traffic congestion issues. It is noted that the new zone enables development of shops less than 1000 square metres (restricted development of above 1000 square metres) per allotment. This would enable division of the site and very substantial areas of shop development.

Rural Horticulture Zone

The Rural Horticulture Zone applies to the Virginia horticulture district, an area that is important to the City of Playford and to the State for its horticultural production and employment. The level of infrastructure providing recycled water and the quality of soil is a basis for high quality production. The area supports the largest cluster of greenhouses in the southern hemisphere.

While Playford supports the transition to Rural Horticulture Zone, there is a concern about the extent to which development which is not ancillary to horticultural activities may establish such as transport distribution, dwellings and tourist accommodation which may conflict with the primary horticultural activities. Land division in this area is also considered to be a concern because of the potential of smaller allotments to take land out of production, noting that the agricultural industry generally trends towards larger site requirements. The existing zoning regime which includes land division as non-complying and restriction activities such as transport distribution has been highly effective in supporting the on-going growth of the horticultural economy and particularly greenhouses.

Council has recently supported and proceeded through public consultation with the Value-adding (Virginia) Development Plan Amendment, in conjunction with major project status consideration being given by the State for a major onion and potato plant for Mitolo. Initial discussions have been held with DPTI staff to emphasise the importance of a careful transition to an appropriate zone with site specific policies as appropriate. The currently proposed Rural Horticulture Zone does not anticipate a development of this scale.

Master-planned Neighbourhood Zone

The Zone is critical to future growth in Playford and while supported as a suitable transition, there are some areas of improvement required. Overlays and public notification require fine-tuning in order to avoid picking up forms of development which are generally appropriate as deemed to satisfy, but may require assessment and / or notification though being excluded from Deemed to Satisfy unnecessarily through inadequate provision for exceptions.

There is also a need to reinforce the reference in zone policies to concept plans in order to ensure orderly development and it is noted that major electricity transmission lines require inclusion as an overlay to be consistent with the manner in which high pressure gas pipelines are treated.

Restricted development

An approach to minimising the number of forms of development in the new Restricted development category is supported.

However, it is considered that the extent of reduction may be an overreaction to the desire to facilitate development throughout the State which will be likely to have some adverse consequences. While lists should be minimised, there is a need to carefully expand the range of development in the Restricted lists in order to ensure that inordinate time is not spent on dealing with development which should be 'turned away' at the counter. Restricted development should include those activities which will clearly in the vast majority of cases be unacceptable. This is considered to be particularly important in the residential/neighbourhood zones where there are many sensitive residential uses.

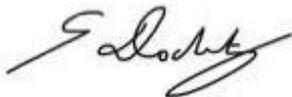
Open space policy

The policy applying to development of open space in Playford is considered to require modification in order to provide adequately for the needs of Playford which vary substantially from those experienced elsewhere. The growth areas of Playford are very flat and require the integration of substantial drainage channels, swales and detention basins into open space areas in a manner which ensures that they contribute to the attractiveness of the open space.

Playford's more detailed submission suggests that definitions of open space and usable open space are included, there is an emphasis on the contribution of areas used for stormwater infrastructure to contribute to open space quality/amenity and that a maximum of 50% of areas used for drainage purposes are considered as open space.

The City of Playford would welcome the opportunity to discuss these matters in more detail with appropriate management and staff of DPTI and the State Planning Commission. This is considered important to an efficient and appropriate transition to the Code and to ensuring that potential opportunities are realised.

Yours faithfully



Glenn Docherty
MAYOR

CC – EXECUTIVE DIRECTOR, PLANNING AND LAND USE SERVICES, DPTI
CHAIR, STATE PLANNING COMMISSION