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Dear Brett

## Revised Draft Phase 3 Planning and Design Code – Submission on Sunrise Christian School

### Introduction

URPS has been engaged by Sunrise Christian School (Sunrise) to review the Draft Planning and Design Code.

Sunrise is a member of the Association of Independent Schools South Australia (AISSA). AISSA, in conjunction with Catholic Education South Australia (CESA) has prepared a submission on the Revised Draft Phase 3 Code through URPS.

Sunrise supports the recommendations and requested changes as outlined in the submission by URPS on behalf of CESA and AISSA. Those changes are more ‘global’ affecting the entire Code and Sunrise has more specific concerns insofar as the Code relates to its site. Sunrise remains concerned with a number of aspects of the Code and requests further changes prior to its implementation.

### Sunrise Land

Sunrise has campuses at Fullarton, Paradise, Morphett Vale, Marion, Naracoorte and Whyalla.

The following table identifies the current and proposed zoning of each campus:

Campus	Development Plan Zoning	Initial Draft - Planning and Design Code Zoning	Revised Draft - Planning and Design Code Zoning
<b>Fullarton</b>	Residential Streetscape (Built Form) Zone	Suburban Neighbourhood Zone (with Historic Area Overlay)	<i>Established Neighbourhood Zone</i>
<b>Paradise</b>	Suburban Activity Node Zone	Urban Neighbourhood Zone	No change
<b>Morphett Vale</b>	Residential Zone	General Neighbourhood Zone	No change

<b>Marion</b>	Residential Zone	General Neighbourhood Zone	No change
	Suburban Activity Node Zone	Urban Renewal Neighbourhood Zone	No change
	Commercial Zone	Suburban Employment Zone	<i>Employment Zone</i>
<b>Naracoorte</b>	Primary Production Zone	Rural Zone	No change
<b>Whyalla Norrie</b>	Commercial Zone	Suburban Employment Zone	<i>Employment Zone</i>

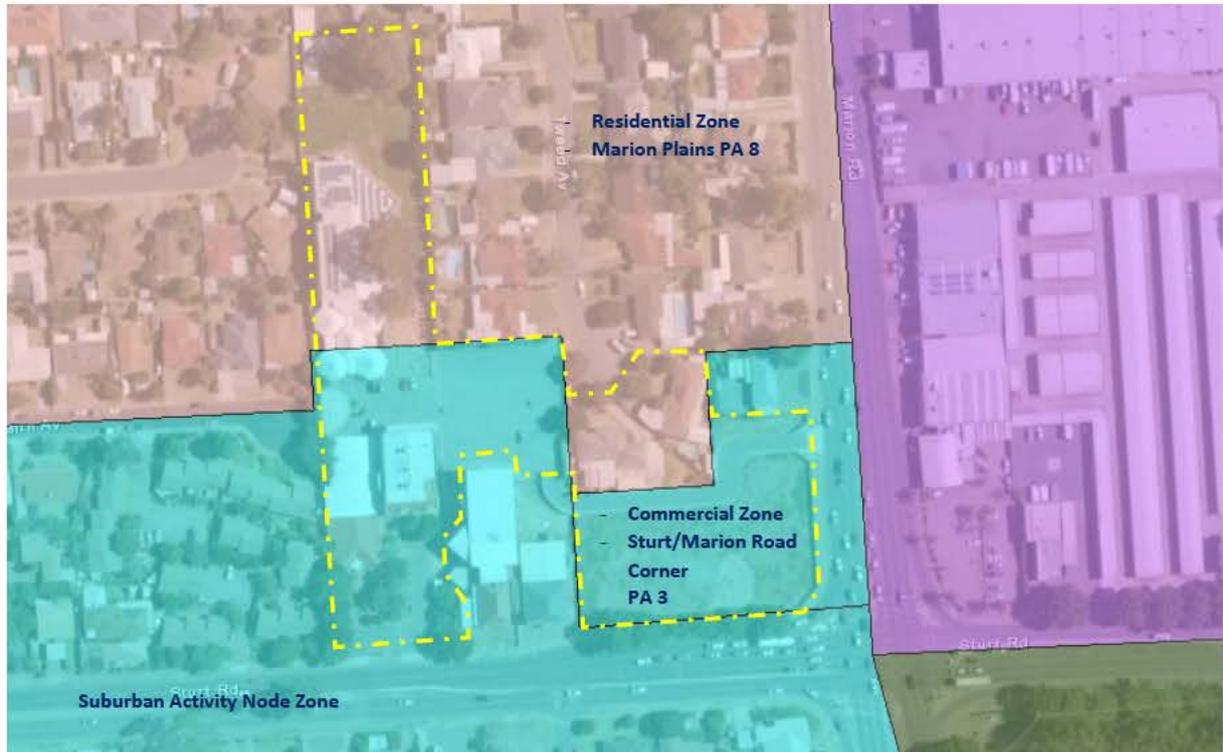
Sunrise generally supported the transition to new Zones but remains concerned with the Marion Campus' transition in part to the Employment Zone. The same zone will apply for its Whyalla Campus.

It supports the transition of its Fullarton Campus to the Established Neighbourhood Zone provided that further changes are made to that Zone to support educational establishments (as addressed in the submission by CESA and AISSA and as further expressed herein).

### Marion Campus

The current and proposed zoning for the Marion Campus are illustrated in the below figures and reflect land currently owned by Sunrise:

**Figure 1 Zoning under the Current Marion Council Development Plan with Sunrise Site Dashed**



**Figure 2 Zoning under the proposed Revised Planning and Design Code with Sunrise Site Dashed**



The zoning of the Marion Campus is needlessly confusing. In August 2019, the Development Plan was updated as part of the finalisation of Part 1 of Council’s Housing Diversity DPA. This DPA split the portion of the School site that was wholly within the Residential Zone to being partly within the Residential Zone and the Suburban Activity Node Zone.

While the inclusion of land within the Suburban Activity Node was supported by the School, that change should have included the entirety of the School site within the Suburban Activity Node Zone. This would have avoided unnecessary confusion between the competing objectives and envisaged land uses between the Suburban Activity Node Zone and the Residential Zone and would provide more certainty for the School and the community as to the anticipated future use and development of the School.

Through the transition to the Code, the School’s land in the Suburban Neighbourhood Zone will be rezoned to the Urban Renewal Neighbourhood Zone. Educational establishments are envisaged in the Urban Renewal Zone and, generally, the School is supportive of the provisions of the Urban Renewal Neighbourhood Zone.

The School requests that its land within the General Neighbourhood Zone and Urban Renewal Neighbourhood Zone be consolidated to the Urban Renewal Neighbourhood Zone. This would provide consistent policy across the majority of the School site.

Most importantly, the School has serious concerns with the rezoning of its land in the Commercial Zone to the Employment Zone. The Commercial Zoned land is located in the Sturt/Marion Road Corner Policy Area 3. That Policy Area seeks a limited range of land uses including consulting rooms, offices, shops (in association with consulting rooms or offices) and residential development in association with a non-residential use.

In comparison, the Employment Zone seeks a far wider range of commercial land uses. Envisaged land uses include light industrial, service trade premises and motor repair stations that are not anticipated for the site under the current Zone and Policy Area provisions. It is an inappropriate zone for the site.

The Employment Zone should be replaced by a zone that better reflects the desired land use mix of the current Development Plan. The nearest equivalent zone would be the Urban Neighbourhood Zone which envisages mixed use development. This Zone is currently drafted to be applied to a portion of the current Suburban Activity Node Zone located approximately 300 metres south of the subject land. It would provide for a similar (but wider) land use mix and one that is not focussed on more industrial type land uses.

The Urban Neighbourhood Zone is also a better fit for the site to deliver the desired high-quality and well-designed development that the current Policy Area provisions seek. The School supports the desire for an iconic and landmark building in this location and has recently received approval to expand the School within the majority of the existing Commercial Zone that will deliver an iconic landmark building in this location.

### Fullarton Campus

Sunrise's Fullarton Campus site is to be located in the Established Neighbourhood Zone.

The General Neighbourhood Zone does not envisage educational establishments (or pre-schools) despite several schools (primary and secondary schools) being located in the proposed Established Neighbourhood Zone. As outlined in the submission by CESA and AISSA, educational establishments (and pre-schools) should be an envisaged land use and the following changes should be made to the Established Neighbourhood Zone as follows:

- DO 1 recognise and support educational establishments in the Zone such that is be worded as follows:

*A neighbourhood that includes a range of housing types and community facilities, with new buildings sympathetic to the predominant built form character and development patterns*

- DTS/DPF 1.1 include educational establishments (and pre-schools) as one of the envisaged land uses
- PO 1.1 be amended to reflect the same wording as PO 1.1 of the Suburban Neighbourhood Zone as follows:

*Residential development and supporting uses that provide housing and supporting services and facilities that preserve a low density residential character.*

### Car Parking

Sunrise supports the changes made to the car parking rates for educational establishments and that these rates permit parking for pick-up and set-down within the public realm where that parking cannot (or should not) be provided on the site of the development.

### Conclusion

Sunrise appreciates the opportunity to further review and consider the Phase 3 Code before its implementation.

Having reviewed the Code, further changes are requested prior to its finalisation by:

- closely reviewing the zoning proposed over the Marion Campus to provide consistency across the site and by including existing portions of the site in the Urban Renewal Neighbourhood Zone and the Urban Neighbourhood Zone, and
- including educational establishments as an envisaged land used with supporting policies in the Established Neighbourhood Zone (i.e. by amending DO 1, PO 1.1 and DTS/DPF 1.1)

Thank you for the opportunity to provide this submission.

Please call me if you have any questions on [REDACTED]

Yours sincerely



**Simon Channon RPIA**

Senior Associate