

DIT:Planning Reform Submissions

From: Aaron Curtis <[REDACTED]>
Sent: Friday, 18 December 2020 3:08 PM
To: DIT:Planning Reform Submissions
Subject: RE: Submission on the Planning and Design Code -
Attachments: 23032018120152-0001.pdf; Community Facilities.pdf

Categories: Deb

Dear Sir/Madam,

Thank you for providing opportunity to make submission in relation to the Planning and Design Code.

I wish to make the following comments in relation to the Planning and Design Code:

1. **Non-residential development in Neighbourhood Zones** – This policy is likely to result in significant increased land use conflict associated with business activities in residential areas. The current home activity provisions contained in Schedule 3 (and defined in Schedule 1) of the *Development Regulations 2008* provide a workable arrangement for the regulation of home activities. The opening up of the policy to encourage up to 50m² of floor space for non-residential uses erodes the present arrangement and is likely to result in an increased number of incompatible land use outcomes.
2. **New dwellings** – The Deemed to Satisfy provisions appear to allow transportable construction types. In established urban areas, transportable housing types may result in development outcomes that are inconsistent with the character of many urban areas. The policy should be amended to subject these developments to more rigorous assessment and take these housing types out of a DTS assessment pathway.
3. **Carports/outbuildings for vehicle parking** – The DTS requirements for these structures in the Neighbourhood Zones appear to have inconsistent DTS requirements for the driveway access to what applies for dwellings. They should be the same in relation to the access requirements to ensure the same outcomes for access.
4. **Boundary walls for development** – An increase in boundary wall lengths from current 8m to proposed 11m (DTS 7.1 in the Neighbourhood Zone for example) is a significant increase and will result in significant increase in boundary walls. The present 8m is considered to be a more appropriate standard.
5. **Design in Urban Areas** – DTS 23.5(a) advises the gradient should not be steeper than 1 in 4 on average. This should be a max, not an average. Please refer to other parts of the Code which refer to 1 in 4 as a max rather than average (DTS 8.2 for example in the Design in Urban Areas module).
6. **Bus Stops** – Bus pads do not appear to have been considered in terms of the potential for conflict from new access. DTS 23.4 under Design in Urban Areas does not incorporate reference to a bus pad for example. The DDA compliant bus pad is some 10m to account for the alighting of the bus at the front and rear doors. New driveway access has potential to compromise the space necessary to accommodate for bus pad. Consideration should also be given to situations where a bus stop exists but the complete DDA bus pad has not been constructed. Land division should not compromise the potential to accommodate the DDA bus pad. It is suggested that DTS requirements for driveway access do not conflict with any part of a bus pad and land division should not result in new allotments adjacent to bus pads unless provision is made to account for their retention.
7. **Finished floor levels** – Finished floor levels are not prescribed in in reference to the kerb. Best practice is that finished floor level should be 300mm above the top of kerb to mitigate against flood risk, even in locations outside of designated flood overlay areas.
8. **Places of worship** – The Planning & Design Code does not provide a framework for the assessment of places of worship. The Salisbury Development Plan contains clear criteria to guide the appropriate location of places of worship and this policy was introduced into the City of Salisbury under a Places of Worship PAR on 21 December 2006. Please refer to the Objectives and Principles of Development Control contained in the “Community Facilities” module in the Development Plan (please find attached). This policy provides an important framework to guide the appropriate location of places of worship, not just in Salisbury but across

the Adelaide metropolitan area. The loss of the criteria provides considerable greater uncertainty for places of worship and relevant authorities in determining the appropriateness and scale of places of worship. For reference, please refer to the judgement of Linscott which gave careful regard to the places of worship criteria;

9. **Hazards (Flooding) Overlays** – The naming convention for the two hazard zones for flooding doesn't appear to clearly communicate exactly what the two areas mean and what is the difference between them. It is understood that one is higher risk than the other but the naming convention does not suggest this. A more similar convention to the bushfire risk areas would be appropriate. The other implication of the present names is that they are likely to be confused between one another. A more distinct and clearer naming convention is desired.

The policies between the two areas also suggest there is little difference in the policy between the two flood areas. The principal difference that I can see is that dwellings within the Hazards (Flooding) Overlay are removed from DTS pathway whereas in the Hazards (Flooding General) Overlay, the DTS pathway still appears to apply. It is questioned whether the policy applying in the higher risk area should be strengthened and greater emphasis given on maintaining flood flow paths and restricting activities that may impede or exacerbate flood risk.

10. **Salisbury specific matters** – The following matters are flagged in relation to spatial application of the Code to City of Salisbury:
 - The Mixed Use(Bulky Goods, Entertainment and Leisure) Zone of the current Development Plan is proposed to become an Employment Zone. This does not reflect like for like change in policy;
 - The Strategic Innovation zone under the P&D Code should be extended to apply to the area proposed Urban Neighbourhood (west of dry creek). This area is subject to established employment uses and the zoning should be consistent & reflective of actual land uses.
 - A portion of the MFP Zoning under the current Salisbury Development Plan at southern end of Carlett Street and Broadwater Crescent in suburb of Mawson Lakes is proposed to be Open Space Zone and this does not reflect like for like zoning.
 - Salisbury Heights is identified as "Medium Bushfire Risk Area", notwithstanding that this area has the same zoning as other parts of Salisbury Heights that are within the Excluded area. Given the transition of this area to urban development, the bushfire risk classification should be reviewed.
 - Industry / residential interfaces – While an Overlay has been created for "Interface Management" and "Significant Interface Management" in the P&D Code, these Overlays do not appear to apply to the majority of key interfaces in the City of Salisbury, namely the areas principally between the Strategic Employment Zone and General Neighbourhood Zones. Land on both sides of the interface for distance of some 250-500m should be subject to an interface with appropriate policies in place to govern development;
 - The Open Space Zone runs along portion of Port Wakefield Road in suburb of Cavan under the P&D Code. The proposed Open Space Zoning should be replaced by Strategic Employment Zone, noting that the Open Space Zone applies to the road and this road is not a principal open space corridor (it is a transit corridor) and unnecessarily results in development that may be subjected to public notification if triggered due to interface between another zone;
 - The Airport Building Heights (Regulated) Overlay applies by way of zones rather than OLS. A significant limitation of the current Zones is that all development in these zones is subjected to the overlay provisions, despite the large majority of such developments in these areas having no implication for aircraft operations. Review of the zones and replacement with contemporary OLS contours is desired.

I welcome opportunity to further discussion the submission.

Regards

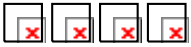
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Community Facilities

OBJECTIVES

- 1 Location of community facilities including social, health, welfare, education and recreation facilities where they are conveniently accessible to the population they serve.
- 2 The proper provision of public and community facilities including the reservation of suitable land in advance of need.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Community facilities should be sited and developed to be accessible by pedestrians, cyclists and public and community transport.
- 2 Community facilities should be integrated in their design to promote efficient land use.
- 3 Design of community facilities should encourage flexible and adaptable use of open space and facilities for a range of uses over time.

Places of Worship

- 4 Places of worship should be developed according to the following hierarchy:

| Scale | Development form | Congregation size |
|-----------------------|---|---|
| Small (local) | Associated with an area of worship ancillary to a residence. These activities are particularly common for religious organisations that do not have a large following and / or lack funds to purchase a standalone building. | Typically accommodate approximately 5 to 30 worshippers in any one session. |
| Medium(neighbourhood) | Purpose built or re-use of existing buildings with medium footprints that are found in most suburbs and country towns | Typically have congregations of up to 100-300 persons in any one session |
| Large (regional) | Purpose built or re-use of existing buildings with large footprints and catering for a variety of ancillary activities | In excess of 300 persons in any one session |

- 5 Small (local) to medium (neighbourhood) scale places of worship within residential areas should be appropriately located on major collector roads to minimise congestion or traffic conflict within local streets.
- 6 Large places of worship should:
 - (a) be located within centre, commercial or the periphery of industrial zones
 - (b) demonstrate the following design features:
 - (i) reuse of existing buildings
 - (ii) the bulk, mass and height of development compatible with the character of the locality
 - (iii) sharing of car parking facilities

- (iv) siting on arterial or collector roads rather than narrower local residential streets
 - (v) promote crime prevention through environmental design principles
 - (vi) reduced land use conflicts in relation to the scale of building form and hours of operation
 - (vii) provide value added functions and facilities that can be used by neighbouring activities.
- 7 Large scale places of worship located in commercial or industry zones should not detrimentally impact on the operations of existing commercial or industrial land uses.
- 8 Places of worship should be established with one car parking space for every three seats or every three attendees to the place of worship.