

State Planning Commission
New Planning and Design Code for South Australia Consultation
GPO Box 1815
Adelaide, SA, 5001

Sent by email: DPTI.PlanningReformSubmissions@sa.gov.au

cc:
Minister for Planning, Stephan Knoll
Premier, Steven Marshall
Member for Finnis, David Basham MP
Mayor for Alexandrina Council, Keith Parkes



28th February 2020

Dear Sirs,

PLANNING & DESIGN CODE - PHASE 3 (Alexandrina Council Area)

I live in Port Elliot within the Alexandrina Council district.

In response to the draft Planning and Design Code – Phase 3, which is currently out for public consultation, I wish to register my strong objections to a number of issues outlined in this letter.

First and foremost, the significant policy changes that this new Code represents, will undoubtedly be the equivalent of driving a semi-trailer into and destroying our social fabric, the heritage character and amenity of Port Elliot and small towns like this one.

Permitting a range of commercial and retail development across hitherto residential zones, decreasing block sizes, encouraging infill and increasing densities and reducing the natural environment at a time when we should be doing everything we can to protect it is, simply put, a recipe for disaster.

This Government's legacy will be the wholesale destruction of heritage, space and character, with beautiful parklands and natural scenery. This is what Adelaide and the surrounding townships are renowned for. Your concepts of "deemed to satisfy", fast tracked approvals and determinations "on merit" will simply mean that people with more money will impose their development and poor quality design agenda on those people with less money, and even less of an ability to be able to object or argue against it.

My specific comments follow:

1. General Neighbourhood Zone

The draft Code places most of Alexandrina Council's residential zones in the General Neighbourhood Zone. The policy in this new zone is entirely at odds with current zone policy and allows for a far greater intensity of development than existing.

I do not agree that the proposed General Neighbourhood Zone is consistent with the residential character of the Residential Zone, Policy Area 11 nor within the context of Port Elliot being a tourist destination and historic coastal settlement. This is because the current Residential Zone focuses on preserving character, rather than accommodating change and infill, and does not envisage a greater range and intensity of development than currently exists.

I request that at a minimum, you move all residential areas to the Suburban Neighbourhood Zone (or even Residential Neighbourhood Zone) with technical and numeric variations (TNVs) to match existing conditions.

2. All Existing Residential Areas

- Non-Residential land use: Currently in Alexandrina Council's residential areas, shops, offices and educational establishments are non-complying. In the new Code existing residential areas will allow these non-residential uses which will adversely impact traffic, parking, noise, neighbour's amenity and the character of our suburbs. This is utterly unacceptable, particularly as residents have bought into and invested significant time, effort and money into their homes inside of a residential zone. All uses which are currently non-complying in our residential areas (e.g. office and shop) should be "restricted development".
- Siting and Setbacks: Under the Code, building setbacks from side and rear boundaries will noticeably decrease, particularly at upper levels. This is unacceptable and will severely impact amenity and privacy in Port Elliot. Existing siting, setback and floor area criteria should be maintained throughout all our residential areas.
- Density and Allotment Sizes: I do not agree with decreasing existing minimum allotment sizes and frontage widths – how will decreased plot sizes and reduced street frontages recognise and preserve the historic allotment patterns and traditional low density / single storey patterns? It is important that current minimum allotment sizes, heights and frontage widths match existing.

3. Historic Area Statement

The lack of identification of Contributory Items in the Code, by either a map or list of addresses, will create uncertainty and confusion for owners, prospective buyers, neighbours and developers. I do not agree with removing protection and lack of inclusion of all Contributory Items. Existing protections and clear spatial identification of Contributory Items on a map should be retained.

I have specific concerns with regards to the Port Elliot Historic Area Statement O2406 (Alex 5) and the Middleton Historic Area Statement O2406 (Alex 3), as follows:

- the generic introduction makes no reference to the Historic Area Overlay being described, so that no context is provided about the historic background and development pattern, nor our townships' heritage values,
- the map provided is grossly basic without any detail such as street layouts/ subdivision patterns, already listed local and state heritage places,
- there is inconsistency in mapping style of the proposed Historic Areas. Alexandrina Council's existing Development Plan maps are far better, and should and could be adapted to replace the minimal, inadequate mapping provided,
- the Historic Area Statement table has no title and no headings apart from "Eras and Themes", and it is not clear what is the function of the table? This needs to be clarified for it to make sense,
- it would appear that the development objectives and/or policies have been omitted from the new Code, which will result in very minimal, vague and subjective guidance with regards to future development in in our townships, and
- I found the terminology used in the Code in relation to heritage difficult to follow and quite inconsistent, with terms being used interchangeably.

I am further concerned that the current historic conservation zone in Port Elliot is drawn too narrowly, and should be expanded to avoid the ridiculous situation of the western side of the street having some level of heritage protection while the eastern side does not. The adjacent side of the street should be similarly protected so that we don't have completely out of character homes sitting directly opposite

(a) Diagram 1 (see over) – shows proposed Historic Area Statement – the proposed zone runs along the middle of the street, as opposed to the more logical place of the rear boundaries. See in Particular, Murray Terrace, where the western side is preserved, but the eastern side is not. I am concerned that, given the eastern side is proposed to be "General Neighbourhood Zone", the eastern side will be developed at odds with the western side, thereby detracting from the heritage nature of this street.

(b) Diagram 2 (see over) – shows what I believe the Historic Area Statement should cover, including many more contributory items that are almost 100 years old. I think this greater protection should be enacted so that these homes are not demolished to make way for high density, low quality, poor quality of life homes.

Diagram 1

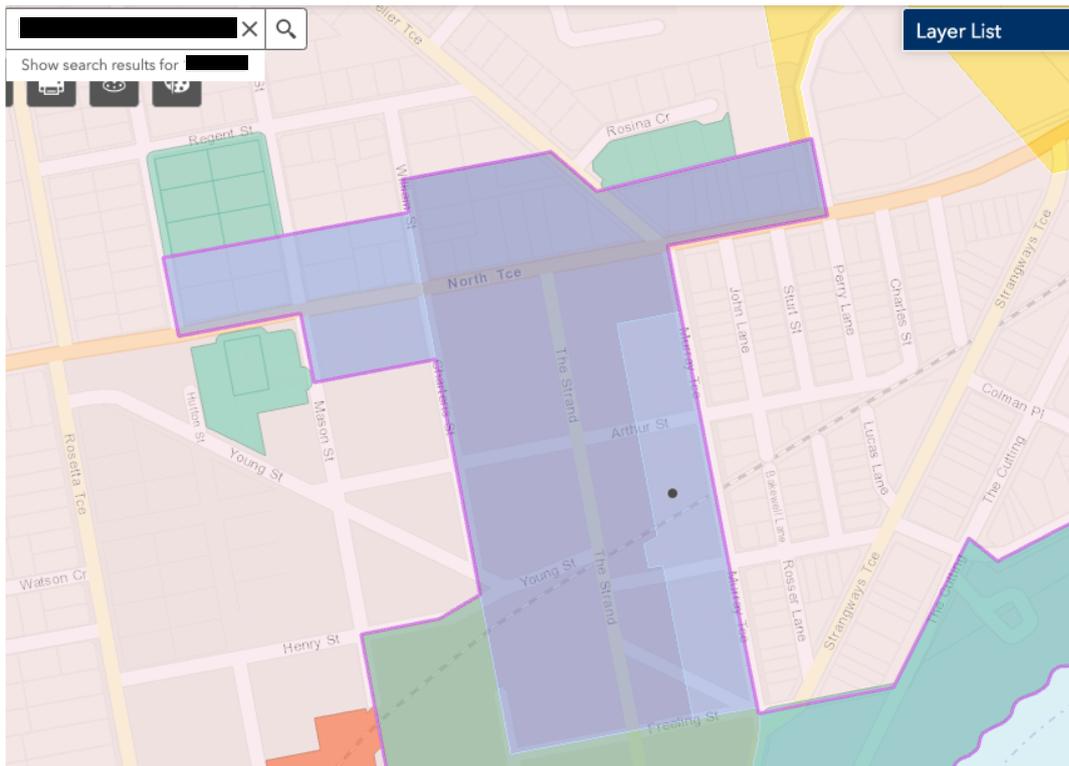
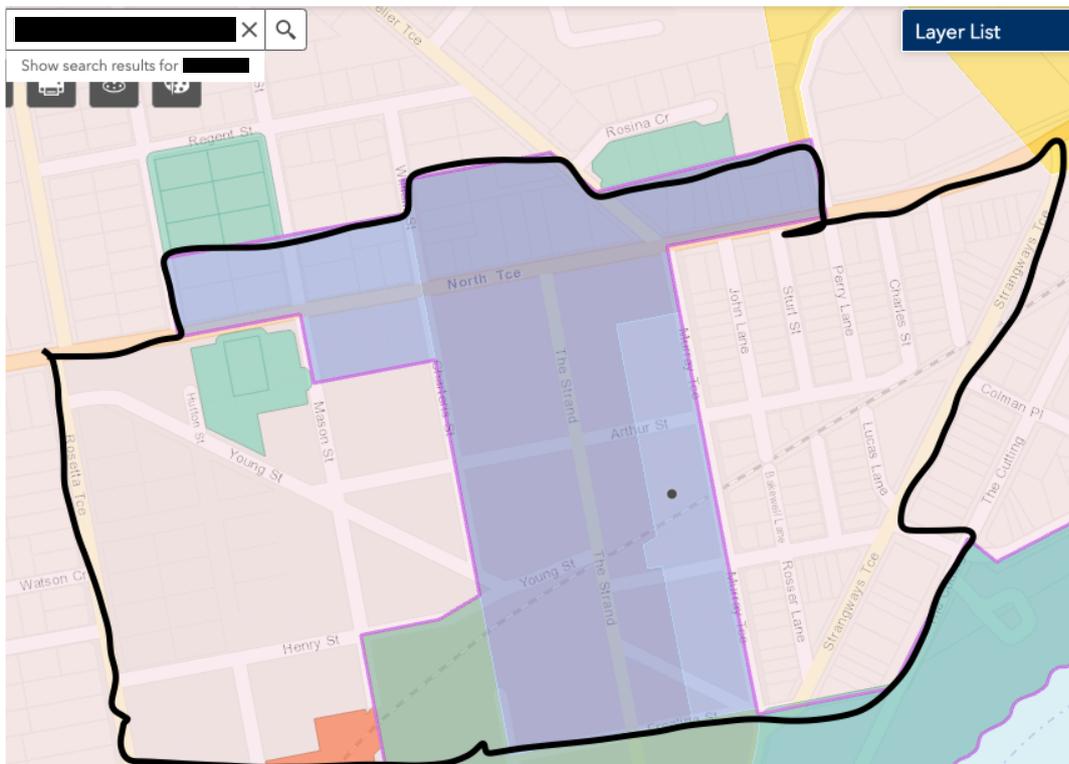


Diagram 2



4. Public Notification

I do not agree with the removal of public notification to neighbours for all proposed development, nor the removal of right of response and appeal. The Code should reflect Alexandrina Council's current Development Plan policy with respect to the notification of neighbours and the public.

5. Impact on Infrastructure and Essential Services

I am concerned that the potential rate and intensity of new development which will be facilitated through the proposed Code policies, could place existing CWMS infrastructure, especially roads and stormwater systems, under stress.

6. Tree Canopy and Climate Resilience

The draft Code facilitates larger developments and the easier removal of trees on both private and public land. This will result in a significant reduction in canopy cover, habitat loss and climate resilience, due the increased infill development opportunities, reduction in minimum site areas, site coverage and setbacks.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns which are shared by many residents, there will be an unacceptable loss of local character and amenity in our townships in the Alexandrina Council area. Once amended, the draft Code should be put back out for further community consultation.

I trust that the concerns detailed above will be given your full consideration.

Yours sincerely,

Belinda Sullivan



Port Elliot, SA, 5212