

24 February 2020

Mr Michael Lennon
Chairman – State Planning Commission

By email: Dpti.planningreformsubmissions@sa.gov.au

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Dear Mr Lennon

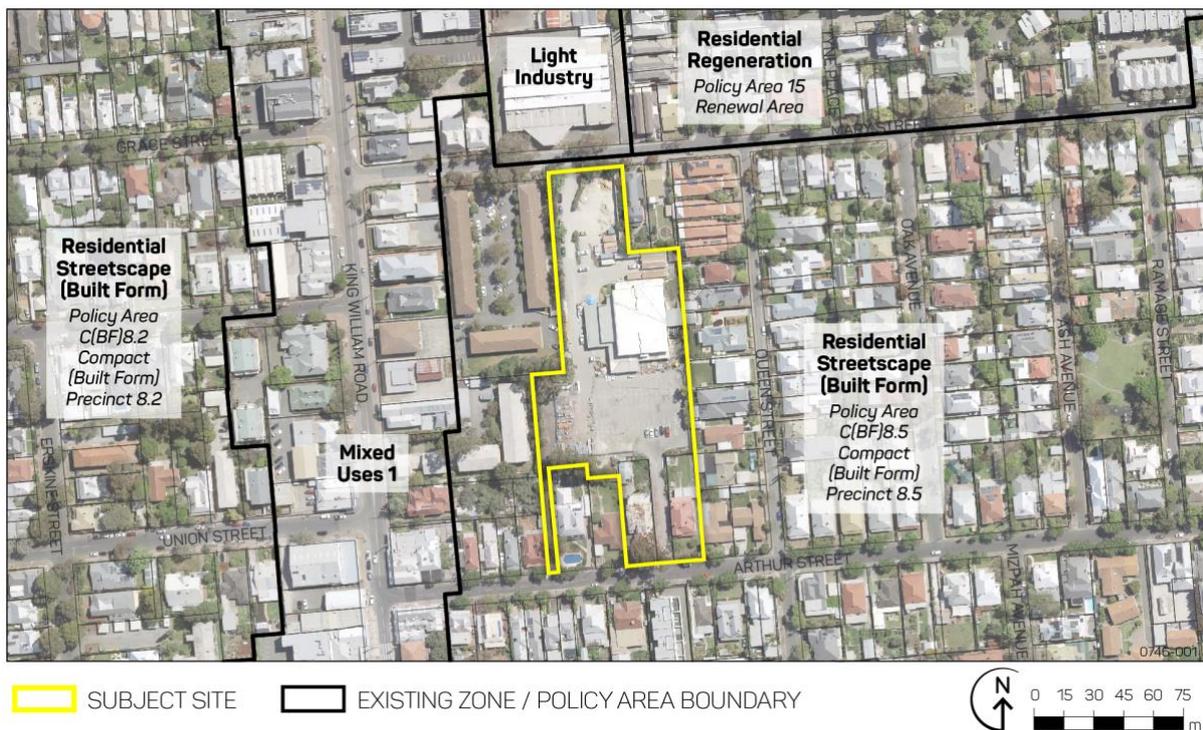
Planning and Design Code Phase 3 Submission – 79-85 Mary Street, Unley

We act for the contracted purchasers of land identified as 79-85 Mary Street, Unley, otherwise known locally as the Brethren Site.

Context

The subject site is identified on the aerial image contained within Figure 1 below.

Figure 1 Subject Site and Existing Zone



The subject land is large in the local context (approximately 1.14 hectares in area) and contains a longstanding non-conforming use in the Residential Streetscape (Built Form) Zone.

In 2010, a Development Application for a retirement village encompassing 94 dwellings and up to three storeys in height was approved. It is understood the nature and scale of development approved was in recognition of the non-conforming existing use, the scale of the site, and the nature of development in the locality. Ultimately, the approved development did not proceed.

The current Residential Streetscape (Built Form) Zone limits dwelling densities, with 500 square metres the stated minimum site area for a detached dwelling. A maximum building height of two-storeys applies.

In early 2019, the City of Unley entered into a tripartite agreement with the owners of the Brethren Site and the State Planning Commission (SPC) to explore the future development opportunity of the key strategic area around Arthur Street, Charles Walk, Queen Streets and King William Road. The subject site falls within this precinct.

The Urban Design Study provided for an initial exploration of possible options for a sensitive, appropriate and mutually beneficial outcome for the site and area. The Urban Design Study anticipated a range of housing typologies, including townhouses and apartments, with building heights between 4-6 storeys.

The City of Unley resolved in October 2019 that the Urban Design Study, key principles, level of green space and balanced development concepts be supported in principle. It is noted that the Urban Design Study has no legislative status.

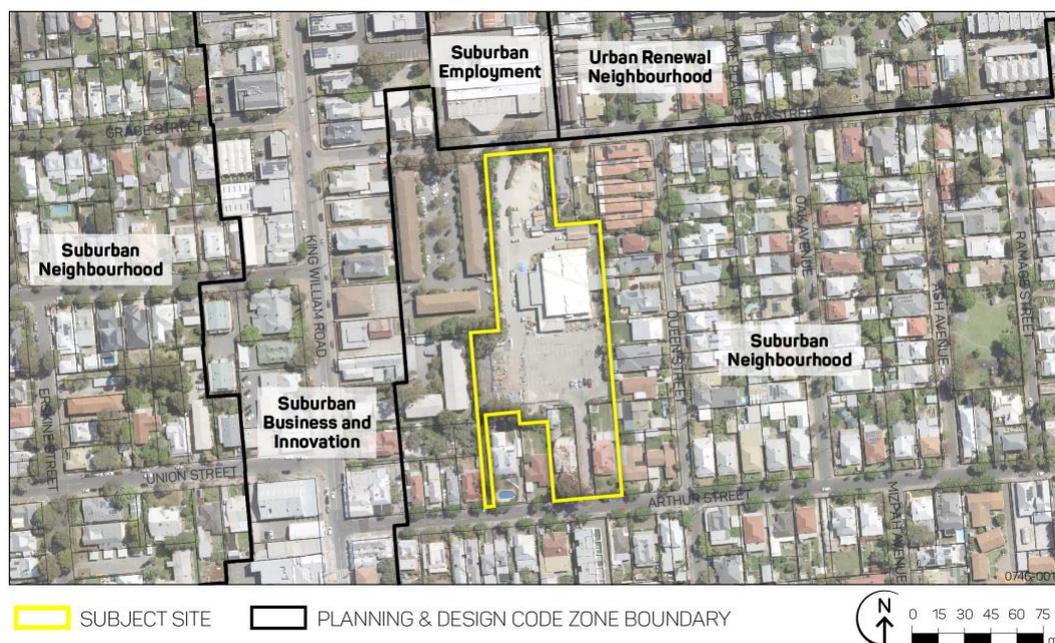
The subject site has now been contracted for purchase. The contracted party has requested that we consider the most appropriate zoning for the subject land, and how such may respond to the draft Planning and Design Code – Phase 3.

Proposed Zone

According to the draft Planning and Design Code, the subject land is proposed to be included in the Suburban Neighbourhood Zone. We however understand that Council has a general position for all draft Suburban Neighbourhood Zones to be included in the General Neighbourhood Zone.

Figure 2 shows the draft Planning and Design Code zoning for the subject land and locality. We note that adjacent zones include the Suburban Employment and Urban Renewal Neighbourhood Zone to the north, the Suburban Business and Innovation Zone to the west.

Figure 2 Draft PDC Zone



In comparing the nature and form of development anticipated by the Suburban Neighbourhood Zone, it is our opinion that the draft Planning and Design Code will constrain the potential for the establishment of an integrated mixed-use development incorporating residential use, such as that contemplated by the Urban Design Study.

The proposed Suburban Neighbourhood Zone is relatively conservative from a density, housing diversity and building height perspective, as demonstrated by the following policies (underlining our emphasis).

DO 1

Low or very low-density housing that is consistent with the existing local context and development pattern. Services and community facilities will contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character.

PO 1.2

Dwellings complement the low-density or very-low density character of the neighbourhood.

PO 4.1

Buildings contribute to a low-rise suburban character and complement the height of nearby buildings.

We further note that the minimum site area is set at 500 square metres with a height limit of 9 metres and 2 storeys.

Having regard to the findings of the Urban Design Study, and taking into account the aspirations of our client, the zoning proposed in the locality, and the range of zones included in the draft PDC, we consider that the subject site is well suited to be included in the draft Urban Renewal Neighbourhood Zone.

As drafted, this zone provides for an increased range of dwelling types, greater dwelling density and increased building heights.

Relevant policies are reproduced as follows.

DO 1

Housing that no longer meets community preferences is replaced with new diverse low – medium rise housing options. Housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity.

PO 1.1

Residential development and supporting uses that are consistent with a spacious and peaceful lifestyle for individual households.

PO 2.1

Buildings contribute to a low-medium rise residential character with the taller buildings located on sites that are a suitable size and dimension to manage massing and impacts on adjoining residential development.

DTS/DPF 2.1

Building height (excluding garages, carports and outbuildings) not exceeding:

(a) 4 building levels and 15m where the site:

- i. is at least 1200m²
- ii. has a frontage of at least 35m

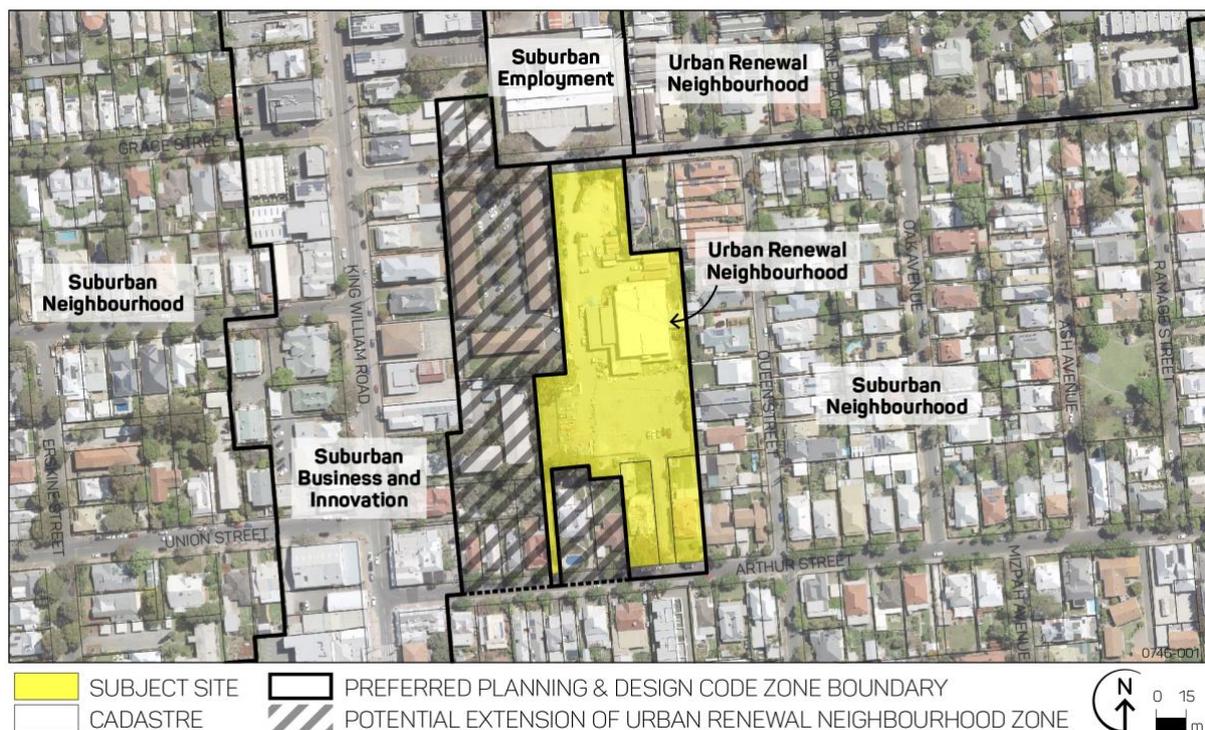
(b) 3 building levels and 12m in all other circumstances.

It is our submission, that in respect to the subject site, the proposed Suburban Neighbourhood Zone should be replaced with the Urban Renewal Neighbourhood Zone which will provide for greater housing diversity and choice, with a relatively modest increase in residential density and building height.

We further note that potential also exists to extend the Urban Renewal Neighbourhood Zone further west so to adjoin the proposed Suburban Business and Innovation Zone.

Figure 3 shows our recommended zoning for the subject site, together with the potential extension of the zone as described above.

Figure 3 Recommended Zone



In our opinion, such a rezoning would create greater value and amenity for the site and locality and conform with the ambitions and intent of the 30 Year Plan for Greater Adelaide and the State Planning Policies (SPP).

We note the proposal would be consistent with the following *Principles of Good Planning* as outlined in the SPP.

Urban renewal principles

- Preference should be given to accommodating the expected growth of cities and towns through the logical consolidation and redevelopment of existing urban areas.

- *Urban renewal should seek to make the best use (as appropriate) of underlying or latent potential associated with land, buildings and infrastructure.*

Activation and liveability principles

- *Planning and design should promote mixed use neighbourhoods and buildings that support diverse economic and social activities.*

We further note that medium scale mixed use development in this location would support the following SPP's and associated principles:

1 INTEGRATED PLANNING

Integrated planning coordinates the strategic use of land with the necessary services and infrastructure. It can influence how a city or region grows and evolves, which if done well, creates liveable and sustainable places that contribute to our prosperity.

- 1.7 *Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations supported by infrastructure, services and facilities.*

6 HOUSING SUPPLY AND DIVERSITY

- 6.1 *Housing is an essential part of people's health and wellbeing. Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations. With the changing composition of our community and our desire to live more sustainably, our housing supply needs to become more diverse in both metropolitan Adelaide and regional township locations.*

- 6.2 *A well-designed, diverse and affordable housing supply that responds to population growth and projections and the evolving demographic, social, cultural and lifestyle needs of our current and future communities.*

- 6.3 *Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.*

- 6.5 *Locate higher density residential and mixed-use development in strategic centres and transport corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.*

We would be pleased to further meet with DPTI staff in order to provide further detail in respect to this submission/request.

Yours sincerely

A handwritten signature in black ink that reads 'Chris Vounasis'.

Chris Vounasis
Managing Director