

27 February 2020

Mr Michael Lennon  
Chairman  
State Planning Commission

Via email: DPTI.planningreformsubmissions@sa.gov.au

Dear Mr Lennon,

**RE: PLANNING AND DESIGN CODE SUBMISSION –  
134 THE PARADE, NORWOOD.**

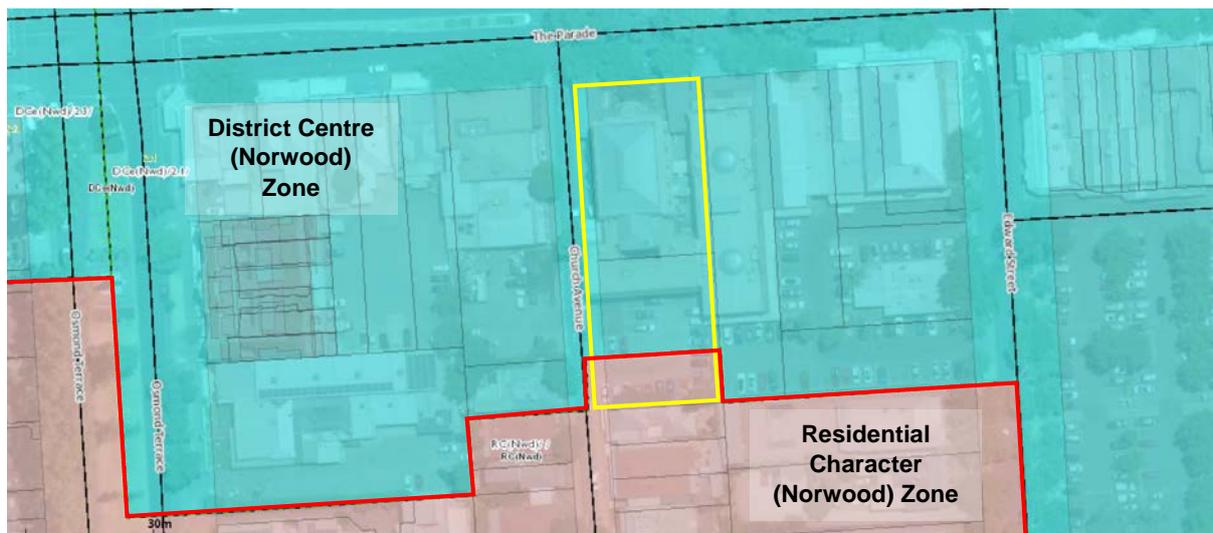
We act for Graydale Pty Ltd and make this submission regarding the application of the Planning and Design Code ('the Code')

Our client is the registered owner of the lands located at No. 134 The Parade, Norwood being allotments 18, 19 and 20 in Filed Plan 5046, Certificates of Title Volume 5981 Folio 481, Volume 5981 Folio 482 and Volume 5784 Folio 492.

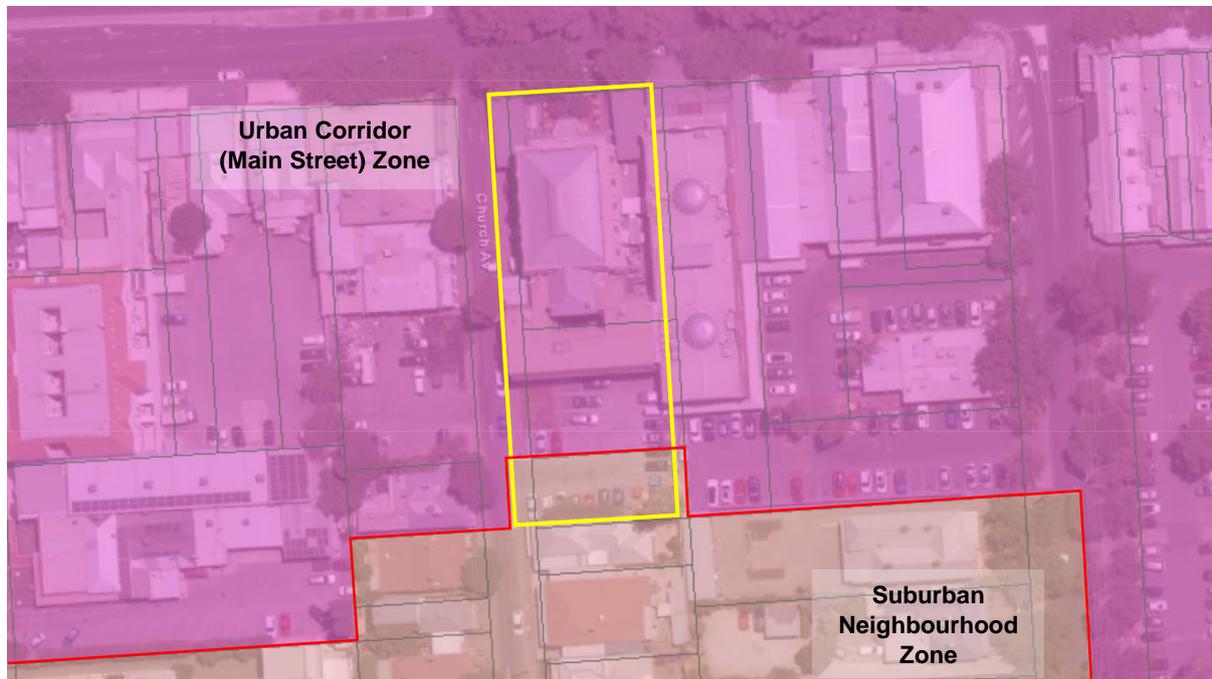
**Zoning**

The spatial pattern and zone boundaries under the Norwood Payneham and St Peters (City) Development Plan are shown in Figure 1 below and the proposed zoning under the Code in Figure 2.

**Figure 1** Current Zoning under the Development Plan.



**Figure 2** Proposed Zoning under the Planning and Design Code.



It can be seen that the subject lands straddle two zones, namely the District Centre (Norwood) Zone and the Residential Character (Norwood) Zone under the Development Plan.

The existing buildings, including the State Heritage listed former Norwood Baptist Church and part of the associated car park are within the District Centre (Norwood) Zone and the remainder of the associated car park is within the Residential Character (Norwood) Zone.

Review of the Code and associated mapping software indicates that this anomaly has been carried over to the Code, where the lands will again straddle two zone boundaries, namely the Urban Corridor (Main Street) Zone and the Suburban Neighbourhood Zone.

These zones are inherently different and it seems to us that achieving compliance with the relevant zone provisions will be counter-intuitive. For example, the envisaged land uses are disparate and the maximum building height within the Urban Corridor (Main Street) Zone is 5 storeys (noting a minimum building height of 3 storeys) and within the Suburban Neighbourhood Zone 2 storeys.

In these circumstances we recommend that the lands be located wholly within the Urban Corridor (Main Street) Zone and not both.

### **Interface Height**

As we understand it, the purpose of the interface angle is to protect residential amenity.

As noted above the existing development includes the State Heritage listed former Norwood Baptist Church. This designation has certain consequences and places significant restrictions on the development potential of the lands. Further, the interface angle of 30 degrees applicable in this instance (southern boundary), results in additional loss of development potential, noting that the adjoining dwelling to the south, to all intents and purposes, presents a blank wall interface.

In consideration of the above, and to facilitate the orderly and economic development of the lands as otherwise expected and rectify, what may be seen as flawed planning controls, we request that the Code be reviewed to address these imbalances.

We respectfully suggest that this will encourage confidence in those investing in the City's continued prosperity.

Yours sincerely

A handwritten signature in blue ink that reads "A. Kelly." with a large, stylized flourish at the end.

**Tony Kelly**  
Principal