

28 February 2020

Reference: 0178

Attention: State Planning Commission

By Email: DPTI.PlanningReform@sa.gov.au.

Copy: City of Charles Sturt

PLANNING AND DESIGN CODE FOR CONSULTATION

We act on behalf of the South Australian Housing Authority (SAHA) which owns the majority of land within the area bounded by Fredrick Road, Westlakes boulevard, Tapleys Hill Road and Glenburnie Street, Seaton (excluding the land in the north east quadrant of this area being east of Anthony Street and North of Pedler Street). Refer to the following policy plan.

Figure 1. Land Holding



We note that the subject land is proposed to be included in a Housing Diversity Neighbourhood Zone, which is a reasonable but not ideal zone for the locality. In particular, this zone introduces height limits (by way of Deemed to Satisfy (DTS) criteria and through a height overlay) that effectively limit development to 2 storeys. This is not acceptable given the intensity of development anticipated to be delivered in this area.

Setback DTS standards are also excessive for a comprehensive redevelopment area such as this.

We believe that this area would be better served by being zoned Urban Renewal Neighbourhood Zone and that no Height Overlay should apply to this locality.

We note that locations within the neighbouring suburbs of Kilburn, Blair Athol, St Clair and Woodville West are zoned Urban Renewal Neighbourhood and demonstrate similar master planned residential developments and SAHA redevelopment areas that offer housing diversity and affordability through variation in dwelling type and size. This zone's assessment provisions are less constraining in dwelling size, height and land use type than that of the Housing Diversity Neighbourhood and therefore essential to the successful redevelopment of the Seaton Area.

If the commission is not of a mind to make this zone substitution, then we would encourage the introduction of greater clarity with respect to Performance Assessed proposals by:

- » Removing the DTS from the Assessment Provisions and insert them into Table 2 (similarly to the way Classification Criteria are used in Table 1);
- » Delete DPF from the Assessment Provisions and Procedural Matters such that performance assessed development is on its merits; and
- » With the removal of DPF altogether, remove the last paragraph under "Rules of Interpretation; Polices – Desired Outcomes and Performance Outcome" and replace it with the following; "Performance outcomes do not need to meet DTS. A DTS represent only one way PO might be met".

This is to reinforce the two distinct pathways of a DTS and Performance Assessment.

We would be pleased to be heard in respect of this matter.

Yours sincerely



Stephen Holmes

Director