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Giovanni Tagliaferri

[REDACTED]
Brompton SA 5007

Department of Planning, Transport and Infrastructure
GPO Box 1815 Adelaide SA 5001
Email: DPTI.PlanningReformSubmissions@sa.gov.au

Dear Sir / Madam

Draft Planning and Design Code – Phase Three

I am writing in relation to draft Planning and Design Code (the Code), with specific regard to the proposal to contain significant parts of Bowden, Brompton, Ridleyton and Renown Park within the Housing Diversity Neighbourhood Zone (see attached map). I understood that the broad intent of the first iteration of the Code was to reflect, as close as possible, existing Development Plan policy. I submit that this has not occurred in this instance.

Existing Development Plan Provisions

As you are no doubt aware, the City of Charles Sturt recently prepared the Residential Council-wide Policies Development Plan Amendment (DPA), which was authorised in October 2017. Part of the scope of that DPA was to update the Residential Zone and Policy Area provisions, including the Desired Character statements and minimum site area and frontage requirements. In relation to the Inner Suburban Policy Area 15, which covers significant parts of Bowden, Brompton, Ridleyton and Renown Park, the Desired Character statement was amended to specifically include the following:

The net residential density of new dwellings will be in the order of 35 to 40 dwellings per hectare or lower (ie the lower end of the medium density range of 35 to 70 dwellings per hectare. This equates to a minimum average site area per dwelling of around 250 square metres.

This intent was reinforced through Principle of Development Control (PDC) 4, which included minimum site area requirements for different dwelling types. These minimum site areas ranged from 220 square metres (group dwellings, residential flat buildings and row dwellings) to 250 square metres (all other dwelling types).

It is also worth noting that this Policy Area applies to already established residential areas containing a variety of allotment sizes, dwelling types, and dwelling ages, generally single storey in form. Some of these sites have progressively accommodated infill development, generally consistent with the aforementioned policies, but of varying degrees of design quality. Arguably, some infill development fails to make a sympathetic presentation to the prevailing streetscape character of these established areas.

Proposed Housing Diversity Neighbourhood Zone

Of particular concern is the stated policy intent of this proposed zone. For example, while the Desired Outcome rightly refers to 'low-rise' housing (ie 1-2 storeys), it then goes on to refer to 'medium density' housing (ie 35 – 70 dwellings per hectare). This significantly

exceeds the current planning policy provisions for this Policy Area. It then goes on to include the following Performance Outcome and Deemed to Satisfy provisions:

PO 2.1

Allotments created for residential purposes accommodate a diverse range of low – medium density housing.

DTS/DPF 2.1

Development achieves a net residential density of up to 70 dwellings per hectare.

Clearly, these densities are significantly higher than those currently allowed and encouraged in Policy Area 15. For example, a net density of 70 dwellings per hectare equates to a minimum allotment size of 143 square metres per dwelling (for all dwelling types). This significant difference in minimum allotment size can hardly be referred to as being consistent with the current Development Plan provisions for these areas.

Conclusion and Recommendation

I submit that the stated intent of achieving policy consistency with existing Development Plans has not been achieved in this instance. The significantly higher densities allowed under the Code effectively transition these areas from a low form, low density Policy Area, to a low form, medium density zone. This will enable infill development at significantly higher densities than those that currently prevail and those that are currently allowed under the current Development Plan.

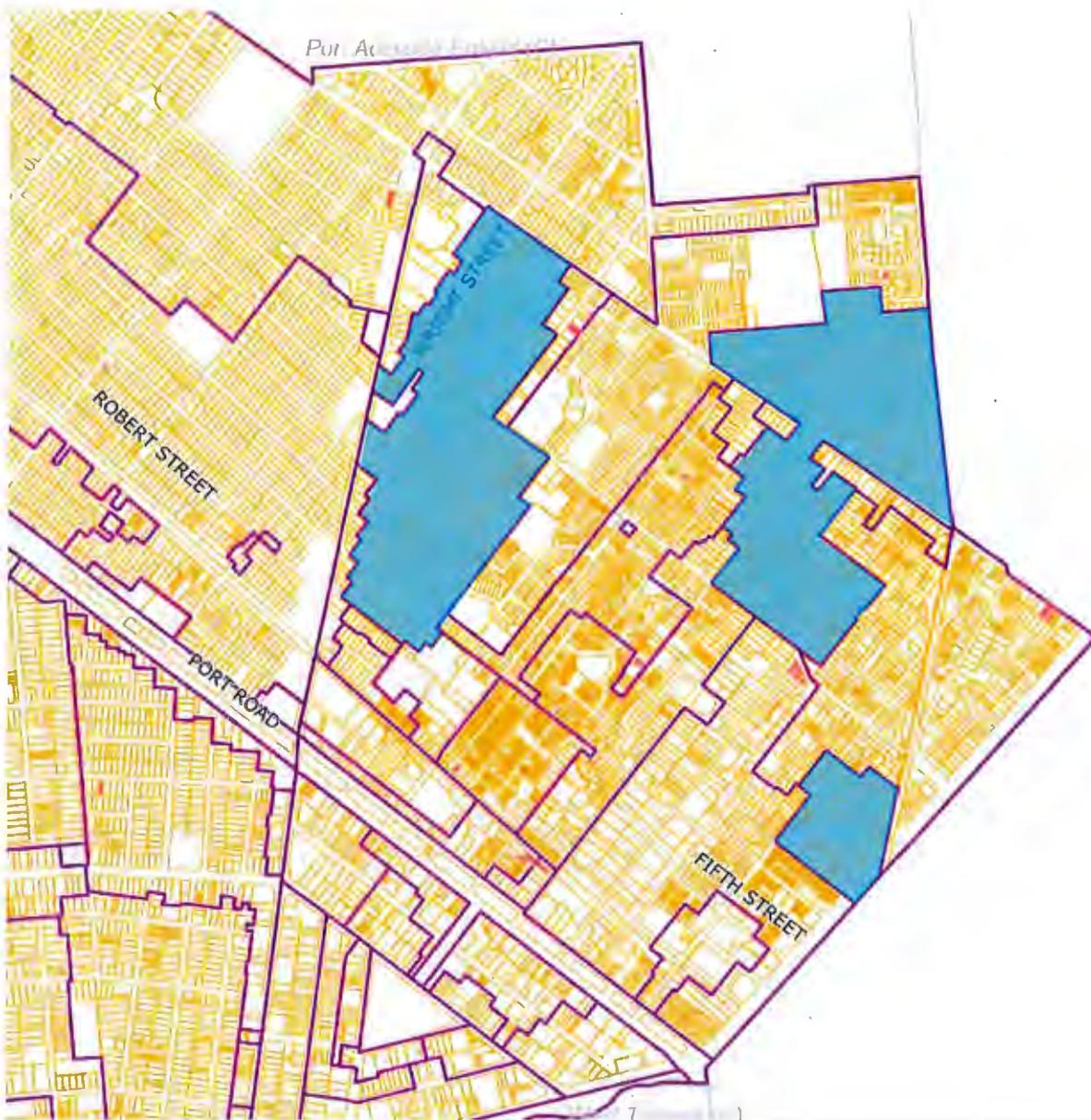
This significant shift in policy and resultant development potential has not been preceded with any assessment or analysis which justifies the policy change, assesses the carrying capacity of these areas to accommodate additional infill development (eg road networks, stormwater systems), or considers the potential impacts of additional infill development on these specific areas. In short, there is no stated justification for the proposed changes.

Finally, the proposed changes represent a significant shift in the deliberate policy approach adopted by the City of Charles Sturt in recent years to focus higher density residential development within discrete areas/nodes (eg Bowden/RSA, St Clair, 'West', Woodville West, Integrated Medium Density Policy Area 20), while limiting 'uplift' potential (and associated impacts) in the remaining established areas. Again, no justification has been provided for such a shift in policy approach.

I respectfully recommend that, either the areas referred to above are placed in an alternative, lower density residential zone (eg General Neighbourhood Zone), or the Housing Diversity Neighbourhood Zone provisions relating to allowable densities are revised to reflect current expectations (ie a net density of up to 40 dwellings per hectare).

Yours sincerely


John Tagliaferri
Encl.



Map showing existing areas of Policy Area 15 (blue) proposed to be contained within the Housing Diversity Neighbourhood Zone