

15 January 2014

The Chief Executive
Residential and Main Street DPA
Adelaide City Council
GPO Box 2252
Adelaide 5001

Residential and Main Street Development Plan Amendment (DPA)

SECRA made two submissions on a previous version of the Residential and Main Street DPA. The first was to the Adelaide City Council on 24 October 2012 and the second to the Minister for Planning on 23 February 2013. Copies of these two submissions are attached. Many of the issues raised in these previous submissions still apply.

SECRA has the following comments to make on the Residential and Main Street DPA.

- Catalyst sites should be those sites with an area greater than 2500 square metres.
- Vehicle access to new developments via minor streets, side or rear lanes should be such that adjacent residences are not affected by headlights and noise, etc from vehicles entering and exiting the site.
- The DPA should require that parking and traffic movement be accurately forecast and adequately accommodated around and within new developments of any kind.
- While public notification is not required for the approval of Category 1 developments there should be a requirement to notify adjacent occupants prior to work commencing.
- While there is a requirement for development on catalyst sites in residential areas to be predominately residential (ie apartments) what is to prevent these becoming serviced type apartments in the future which in effect changes it to a commercial hotel?
- The DPA states that external finishes should be stone, brick and/or brick render and that brightly coloured or highly reflective materials should be discouraged. Obviously in the case of upstairs additions to older houses it is impractical to use a heavy material such as stone or brick and consequently it appears that the current practice for upstairs additions is to use corrugated galvanised iron as the external finish. However there appears to be no reference in the DPA regarding the use of light weight materials. It is considered and that should be some reference in the DPA to the use of appropriate lighter weight materials for use in these circumstances..
- The graphs below show the power collected by solar panels on a residence during a day with periods of overcast (Diagram 1) and a sunny day (Diagram 2) during June 2013.

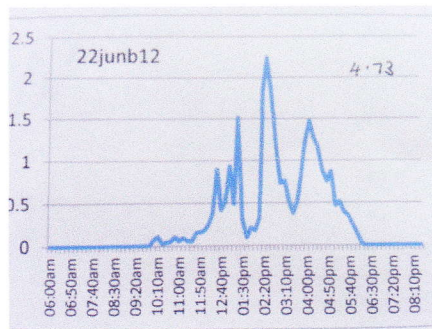


Diagram 1

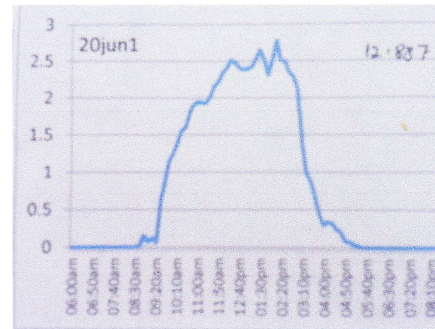


Diagram 2

The diagrams illustrate that the DPA requirement to allow 2 hours of sunlight between 9am and 3pm on 22 June on solar panels of adjoining properties would render the solar panels ineffective. Under these circumstances the DPA should require the owner of the solar panels to be compensated by the developer if a new building overshadows the panels.

- The effect of overshadowing of adjacent roof top gardens should also be taken into account when considering approval for high rise developments.
- The DPA should require that all developments provide suitable areas for refuse and recycle bins to be stored on site and out of sight from the street. This should apply to both residential and commercial developments.
- There is a concern that, on the boundaries of the zones, there is nothing in the DPA regulating how impacts from allowable developments in one zone will be treated to minimise their effect on the adjacent zone. While zone boundaries may be the centre of the roadway separating the zones properties may be subject to overshadowing and other adverse effects from developments on the other side of the road where different development requirements apply. This should be addressed in the DPA.
- SECRA is concerned that while high rise developments within residential areas should be residential it would appear that the ground floor of such developments can be for commercial development. It is considered that any such development should be limited to commercial undertakings that provide services for local residents.
- The DPA does not sufficiently address the need for landscape buffers between the structure and the street. Too often developments do not have any set back from the street which is not in keeping with the streetscape. Where possible developers should be required to provide a landscaped street frontage.
- Given that the Government is no longer proceeding with the redevelopment of the Manitoba and Box Factory sites it is suggested that the statement in the DPA that development on these sites *"may comprise a variety of building forms comprising a number of separate buildings of between 2 and 8 storeys separated by landscaped open space areas for residents and visitors"* should be changed to *"... buildings with a maximum of 3 storeys"*.
- The DPA should make it clear that small bars should not be located adjacent to residential areas.

SECRA is concerned that the Minister for Planning received the DPA early in 2013 but did not approve its release for consultation until 8 October 2013. SECRA understands that this delay was due in part to the Minister not agreeing with the Council on some aspects of the DPA and insisting on his requirements. For example the Minister rejected the Council's request that Catalyst sites be those sites greater than 2500 square metres whereas the Minister required catalyst sites only to be greater than 1500 square metres.

As stated in previous submissions SECRA is not opposed to high rise development but is of the view that such development should not occur within what is predominately a residential area. With catalyst sites only being required to be 1500 square metres there is a greater potential for high rise development within existing residential areas of the city. A site of only 1500 square metres also provides limited opportunity to reduce the height of the structure towards the boundaries in order reduce overshadowing of adjacent residences.

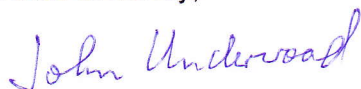
SECRA is also concerned about the approval of developments with a cost in excess of \$10 million being taken away from the Adelaide City Council's Development Assessment Panel. It beggars belief that the Planning Minister John Rau has now also removed the statutory consultation rights from the Adelaide City Council for developments over \$10 million and that this action was taken without any consultation with the Council. Residents in the city rely upon the Adelaide City Council to represent their interests and concerns about such developments, particularly when they are in residential areas of the city. This representation has now effectively been taken away from city residents by the Minister for Planning.

At a public meeting held in the Norwood Town Hall, at which the Minister for Planning attended, and at workshops held during last year by the Planning Review Panel, the Government's lack of consultation on the DPAs was continually raised. The Minister for Planning appears to be ignoring this discontent and is continuing with the lack of consultation that was experienced under the previous Rann Government. This is a disturbing development and as a result representatives of City and Inner City Residents' Associations met last December and decided to form an alliance of City and Inner City Residents Associations (CISRA) to raise the public awareness of residents on the most unsatisfactory situation regarding development planning prior to the state election in March 2014.

It is important that residents are made aware of the above issues prior to the election as persons are placed on the electoral roll on the basis of their principal place of residence and not by what businesses they own and what donations they may chose to give to political parties.

A SECRA representative would like to speak to the public hearing on 29 January 2014.

Yours sincerely,



John Underwood
Chairperson
South East City Residents Association (SECRA)
Ph 0428 232 418

SECRA Postal address: PO Box 7017, Hutt Street, Adelaide SA 5000.