



Friends of Willunga Basin inc.

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Friends of
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Ms Helen Dyer
Chair, State Planning Commission
c/- Planning and Land Use Services Division
Attorney Generals Department
saplanningcommission@sa.gov.au

24 March 2021

Dear Helen

Re: Aldinga Suburban Neighbourhood DPA/Draft Planning and Design Code policy and assessment provisions for the MASTER PLANNED NEIGHBOURHOOD ZONE

Friends of Port Willung (FOPW) and Friends of Willunga Basin (FOWB) write to provide comment on the Aldinga Suburban Neighbourhood DPA consultation document. You will be aware that we have previously requested that the DPA be recalled and reissued as a 'Code only' document, a request which was declined. Our view of this aspect of the process – ie being required to submit under two different systems (despite one of those systems now being redundant) – remains unchanged.

More than this though, the document presented for consultation is quite opaque as to its policy intent. The Planning & Design Code is predicated on the fundamental notion that community should be involved at the policy end of the planning process – which is 'now' in this current instance – because its ability to do so at the development application stage will be curtailed under the new system. This being the case, policy documents released for consultation and community input need to provide something substantive for community to respond to.

This is demonstrably not the case at Aldinga. Not only is community grappling with a new system which is not yet well understood, but the document presented provides a single zone across the entire site, with little or no detail on the desired spatial or built form outcomes. Specifically, Appendix 2 (Draft Planning and Design Code policy and assessment provisions for the MASTER PLANNED NEIGHBOURHOOD ZONE) provides generic references to desired densities, allowable lot sizes and possible height limits but no detail on the likely mix or spatial distribution across the site.

It appears that much will rely on a future Building Envelope Plan (BEP), however there is no information on what exactly that is, how it is mandated or whether a BEP (or is it BEPs?) is even proposed here – or on how community members may be able to have input into such a BEP. Nor is there any reference in the Master Planned Neighbourhood Zone policy as to how it will relate to either the Character Preservation District overlay it abuts to the east or to the Onka 9 Historic Area overlay spanning the Aldinga/Port Willunga Township Zone to the north and north east.

Similarly, there is no clue given as to how the suburb design might be required to achieve north-facing living areas, solar access and sufficient tree canopy. There is also no reference to either what energy star ratings or overlays or might be applied to a future Master Planned Neighbourhood development or on whether the Urban Tree Canopy overlay will apply (noting that this overlay is applied to the General Neighbourhood Zone adjacent to the west).

For the most part, the 'Implications for the Code' set out in the document convey so little meaning that it is difficult to make a meaningful response and so we have not attempted to do so as such. Rather, we offer comment under a series of headings as below.



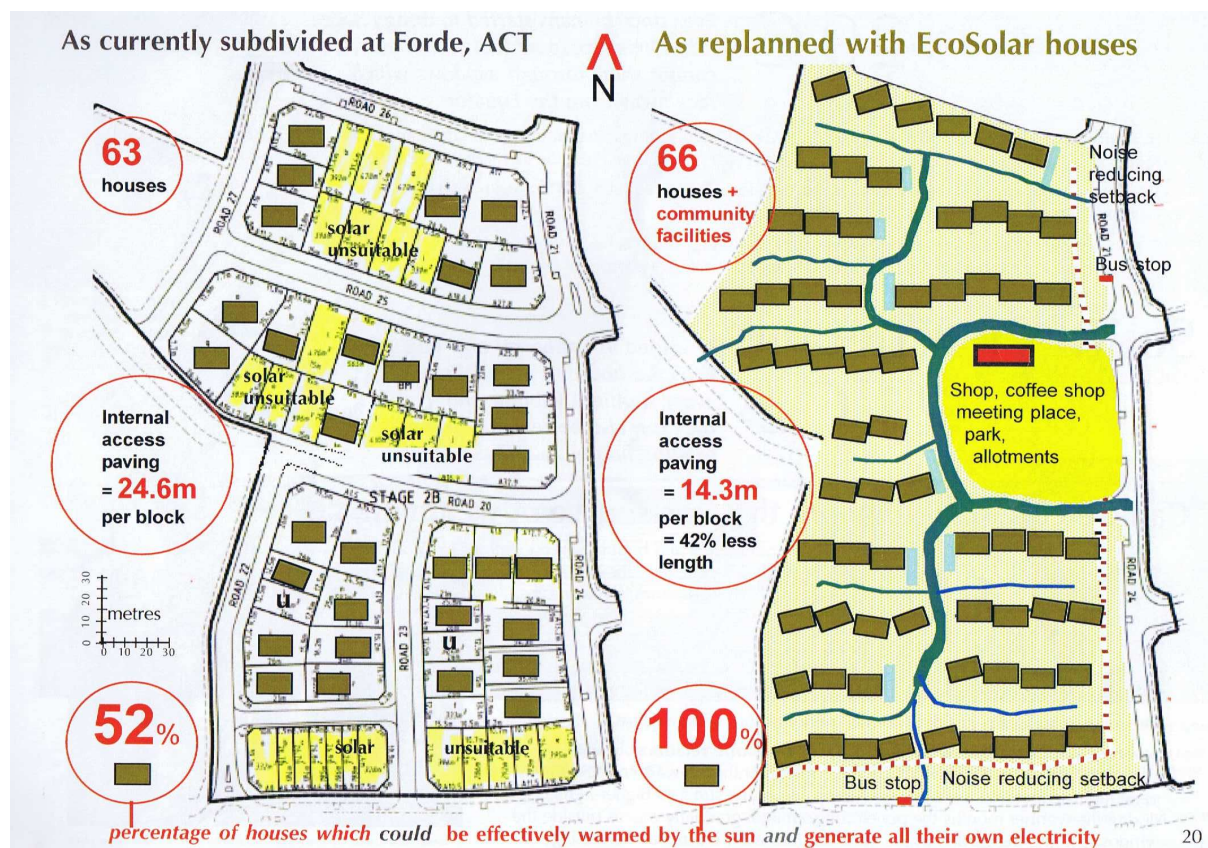
The one exception is to note that the Accepted Development pathway outlined in Sec 4, which provides that no planning consent is required because the development is effectively pre-approved, presumably as per application made by 'the proponent' – who will presumably have purchased the land from Renewal SA. In this regard and although a separate matter, we urge that Renewal SA be actively involved in this process. The larger point though is that there is still a process to come, to pre-approve the master planned development via an as yet unclear process which warrants further community consultation.

In the light of the above, the Friends of Port Willunga and the Friends of Willunga Basin strongly request that a process be put in place to involve community members in the development of a Building Envelope Plan, and the establishment of relevant overlays and criteria that relate to the long term environmental and social sustainability of the design of the new suburb ahead of any sale to a property developer.

Specifically, community members need to be involved in ensuring the following issues and aims are addressed when developing detailed guidelines for the design of the suburb, whether this be in the form of a BEP and set of associated set of criteria or (some) other form(s) of development brief:

1. Allotment Layout

FOPW and FOWB support an allotment layout that enables passive solar design – that is, maximization of north-facing living areas in any proposed Masterplanned Neighbourhood at Aldinga. Derek Wrigley's, 2009, 'Low energy affordable housing' booklet demonstrates all of the principles and provides practical examples of lot layouts which achieve higher yields:





FOPW and FOWB assert that the Masterplanned Neighbourhood Zone needs provisions which mandate relevant guidelines of the Planning Guide published by the SA Department of Planning and Local Government titled 'Land division – how Best Practice Land Division can contribute to Household Energy Efficiency' (2010) to achieve energy efficiency requirements through block shapes that enable houses to be built with good orientation for the main living areas. (www.sa.gov.au/__data/assets/pdf_file/0017/15236/Land_division_how_best_practice_land_division_can_contribute_to_household_energy_efficiency.pdf)

2. House Design

FOPW and FOWB support mandating a minimum energy rating of 7.5 stars for dwellings and other buildings in the Masterplanned Neighbourhood under the Nationwide House Energy Rating Scheme.

3. Housing Densities

FOPW and FOWB assert that high density living is not appropriate at this site given the still peri-urban location, lack of frequency and lack of diversity of public transport options, the site's distance from the Aldinga Suburban Activity Centre and the role the site plays in the transition between the General Neighbourhood Zone to the west, the rural Character Preservation District to the east and Historic Area to the north and north east. The site should therefore be limited to accommodating low and medium density housing only, with a 3-storey cap to enable sustainable "walk up" developments in suitable sites located away from the Character Preservation District and Onka 9 Historic Area Overlay boundaries to the North and East.

4. Tree Canopy, Landscape and Open Space

FOPW and FOWB support application of Low Carbon Living's 'Guide to low carbon landscapes' (builtbetter.org/node/7832) to the proposed guidelines for any new Master Planned Neighbourhood development. We also support application of the Urban Tree Canopy overlay to the entire zone to ensure space is provided for at least one tree per dwelling.

5. Renewable Energy

FOPW and FOWB support an all-electric development and a mandated package of solar panels, batteries, heat pump, electric car chargers and water tanks, that could be heavily discounted at scale.

6. Water Sensitive Urban Design

We support the mandating of Water Sensitive Urban Design principles enabling nature playgrounds, rain gardens, community gardens, fruit trees, biodiversity corridors and native vegetation in the open space and linear parks.

7. Lighting Design

We recognise that while lighting will contribute to improving the liveability of the neighbourhood at night, it also has potential to contribute to light pollution effects on the adjacent rural Character Preservation District and Aldinga/Port Willunga Historic Area. We therefore support mandated energy-efficient downward-oriented urban lighting that avoids unnecessary use of artificial light while responding sensitively to the structure of the neighbourhood and the likely habits of its inhabitants. Specific categories of light pollution that must be avoided include light trespass into the neighbouring zones, over-illumination, glare, light clutter and skyglow above the new suburb.



8. Green Buffer to Kangaroo Island scenic tourist route and McLaren Vale Character Preservation District

The interfaces between the Master Planned Neighbourhood Zone and the adjacent Character Preservation District and Onka Historic Area 9 are of the utmost concern to FOPW and FOWB, as has been documented over time. We note that preservation of the 'Green Triangle' of land between the new zone and the Port Road Avenue of Pines as a deferred urban zone achieves a temporary buffer to the northern boundary of the Zone, as do the locations of the new high school and Recreation Zone to the north. The width and extent of a green visual buffer along the Main South Road boundary of the zone will however be of the utmost importance to the buffering of this sensitive tourism area and needs to be provided for outside of any road-widening provisions. This needs to be a true visual vegetation buffer and sound barrier, possibly achieved through mounded landscaping, and specifically not through a 'stratco-type' fence or wall partially obscured by vegetation.

In conclusion, we continue to contest that the decision to consult the community under two different systems (despite one of those systems now being redundant), has been extremely unhelpful, especially in light of the new system's fundamental notion that community should be legitimately involved at the policy end of the planning process.

That said we have attempted here to highlight the core issues of concern for many members of our diverse neighbouring communities in the hope that this will assist in shaping the final provisions and required outcomes for a high-achieving and exemplary Master Planned Suburb Zone at Aldinga.

We also insist, given the lack of policy detail currently being consulted on, that our groups continue to be involved in developing policy for the new suburb ahead of any sale or negotiation with a private developer.

This is government owned land, about to be released to market. In 2021, as the future becomes ever more apparent, community has a right to expect a best practice outcome, as measured by the sustainability and liveability of the housing stock to be created. The current DPA gives little or no confidence that this will be achieved.

Finally, both our groups request to speak at the public hearing on Wednesday 7 April 2021 at 7.30 pm.

Yours sincerely,

Stephanie Johnston B Arch St MURP MICOMOS
Chair, Friends of Port Willunga

Geoff Hayter FAPI
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