

27 February 2020

State Planning Commission Department of Planning Transport and Infrastructure

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Adelaide SA 5001

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Dear Commission,

Re: Planning and Design Code, State Planning Reform for South Australia

In relation to the new planning and design code. I live in the suburb of Black Forest in the city of Unley. In the new plan, Black Forest and a portion of Clarence Park is to be transitioned from the RB350 zone to the general neighbourhood zone. It is my understanding that the Minister indicated that there was to be little or no change to existing zones with this new planning code.

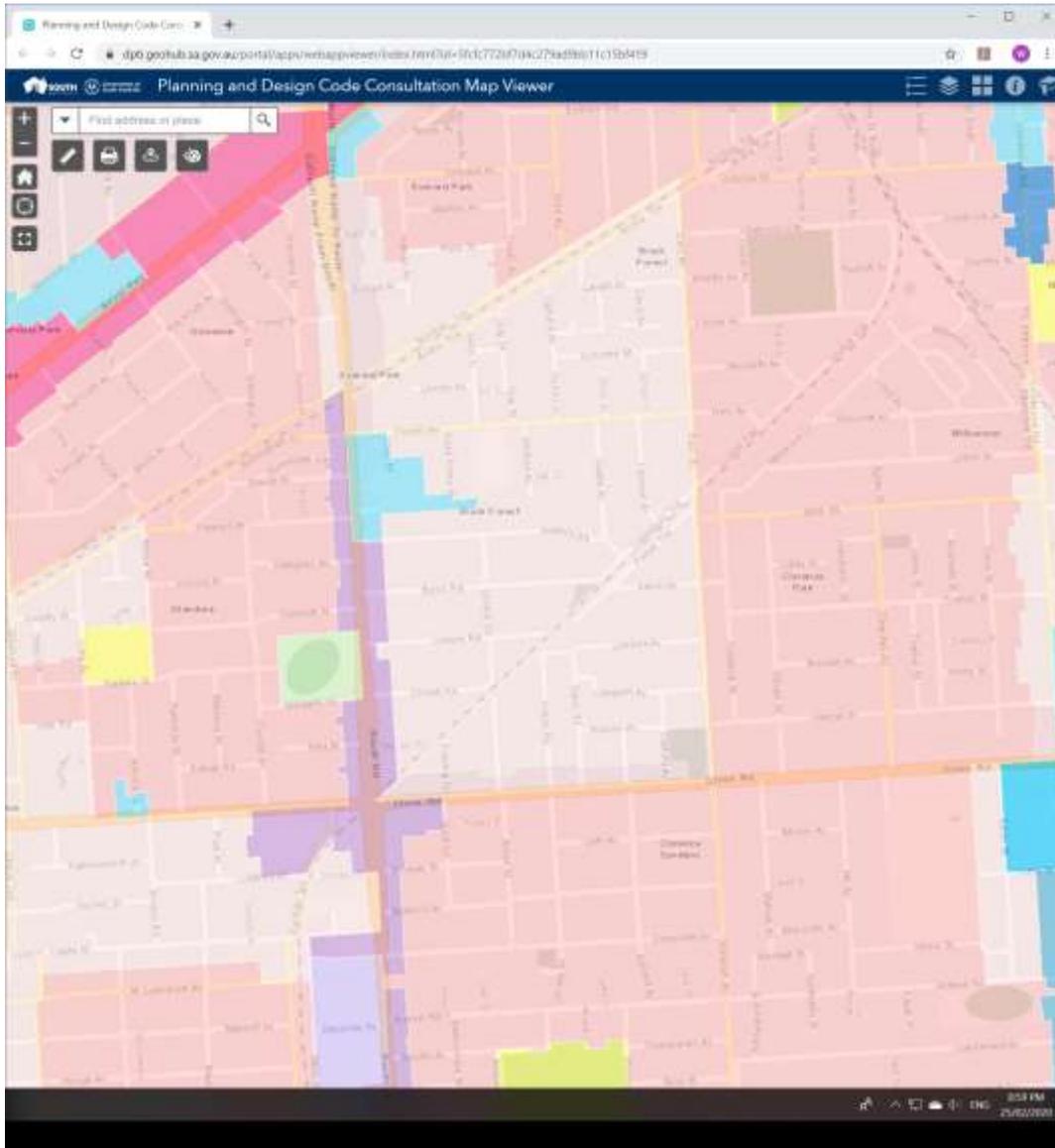
Black Forest consists of primarily deep blocks with narrow street frontages. It has an appealing character, full of Jacaranda street trees and many 1920's bungalows. The change-over to general neighbourhood zone implies that this character is not valued and should be sacrificed in order to meet infill requirements. What urban infill that has happened within the area in recent times have been 2 for 1 home developments. One advantage of the 2 for 1 infill is that there are many cases where the original home has been kept, thus resulting in less impact on the streetscape.

With the change over to the general neighbourhood zone and given that planning and development rules are advisory and not hard lined (rules are "should" not "shall") means that if a submission is not greatly at odds with the rules then it is likely to be passed. With the general neighbourhood zone allocation of 300m² per dwelling (or 200m² for row housing on corner blocks) that these deep Black Forest blocks could result in 3 dwellings per original block size. Alternatively, if a developer bought up multiple dwellings/blocks then there is potential for even further impact to the streetscape. This can have flow on effects such inadequate parking, overlooking and storm water run-off issues.

Tree canopy should be a major consideration when dealing with such rezoning. Trees provide habitat, biodiversity and neighbourhood amenities. Harsh Australian summers are tempered by the presence of trees, providing micro-climate cooling. Black Forest has very good tree density, especially with the Jacaranda street trees but with the general neighbourhood zone this density is severely at risk. The existing streetscape is what attracted us to buy and live in the area and I am concerned that it is at risk if the government determines that the suburb is up for renewal.

From reviewing the proposed new zones, it appears that the RB350 zone that Black Forest currently has, is more in-line with the suburban neighbourhood zone. This is highlighted by the fact that all of the suburbs surrounding Black Forest has been afforded the suburban neighbourhood zone in the new planning code i.e.

- Glandore to the West
- Clarence Park to the East
- Clarence Gardens to the South
- Everard Park to the North



There are many differences in the rules between RB350 and the general neighbourhood zone, however one of major concern is that the new zone specifies no side setback restrictions. This means that there appears to be no laws to stop a neighbour placing say a 9m wall on the boundary of a property. Such a situation can have a tremendous impact to existing home-owners, especially if the blocks in question are deep. It is extremely important that the government provide enough reasonable restrictions/laws to ensure that any development of neighbouring properties does not severely impact existing homeowners.

A principle goal of town planners to create desirable places to live. In contrast, it is the primary goal of some or most developers to maximise profits. Without enough guidelines in place, it is foreseeable that suburbs can be degraded in their amenities such as parking, trees (shade), overlooking and general feel. It would appear that the general neighbourhood zone does not provide enough such guidelines. I also understand that there are plans to remove or restrict Councils' involvements in planning and development. This I believe is a mistake as I feel that councils are best placed for administrating/applying the planning and development rules as they have a vested interest for all constituents within the council area.

In closing, I hope you reconsider the Black Forest/Clarence Park zone allocation. I support the submission prepared by the City of Unley indicating that existing RB350 zones should be allocated the suburban neighbourhood zone. I also believe that the general neighbourhood zone should have side setback rules put in place such as to minimise the impact some developments can have on existing properties.

Regards

Wade Farrell

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