

Submission to Department Planning Transport & Infrastructure regarding the Planning & Design Code for Phase 3

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To whom it may concern.

Dear Sir/Madam,

Thankyou for the opportunity to comment on the draft Planning and Design Code (Phase 3). Your department is to be commended on the amount of work that has been undertaken to develop the substantial reforms proposed, which aim to make planning and development easier to understand and enact.

I understand that the Planning and Design Code (Phase 3) has been developed to replace the current development plans of each suburban council. I am also aware that these plans evolved over many years of community consultation, meaning that each plan is tailored to the diversity of suburbs that exist across Adelaide. This diversity is what makes Adelaide unique and sets it apart from other Australian cities. I also understand that the opportunity could exist to access the existing zoning idiosyncrasies via an on-line mapping application, thus providing rapid, specific, detailed and consistent information to landowners and developers.

Given that the Department is unlikely to substantially amend its proposed reforms at this stage, comments are proposed on the current draft Planning and Design Code. Firstly, I am concerned that the document will create substantial and inconsistent zoning changes to some suburbs, despite claiming to be just 'transitional'. For example, my suburb (south-west Black Forest) is currently zoned RB 350 in the Unley Council Development Plan, which means that the typical suburban house block in this area can be subdivided to allow for two dwellings (and leaving little or no green space). Under the current proposed 'General Neighbourhood' zoning, the plan would allow 3 or 4 dwellings in the same area with minimal setbacks. From the definitions provided, it is clear that the proposed 'Suburban Neighbourhood Zone' (with numeric variation overlay) would better match the current zoning, and would be consistent with the zoning of adjacent suburbs. I assume this proposed transition was unintentional and am concerned the same has happened to other areas.

Secondly, I am concerned that the draft Plan does little to address issues associated with substantially increasing population densities in older suburbs which do not have the associated infrastructure and open space to cope (e.g. parking space, road widths and design). For example, current and proposed planning policy in older suburbs is leading towards dwellings with road frontages dominated by carports, little or no green space and increased reflected radiation. These suburbs typically have little public green space because it was assumed this would be retained within individual larger allotments. Do planning authorities want this? A smarter solution might be to encourage multiple storey flat-style accommodation within a minimum-sized larger area (e.g. 3 adjacent allotments), thus retaining sufficient open green space and allowing ample parking and setbacks. A quick look around the older suburbs provides numerous examples that allow larger trees

to be retained without creating a safety hazard (although clearly I am not advocating the 60s-style architecture!). There are many examples of this type of infill development in European cities that could provide inspiration. There are also areas of derelict land around Adelaide (e.g. the old Hills site at Edwardstown) which could be cleaned-up and redeveloped without resorting to established older suburbs. This type of clever planning reform would provide the desired increase in population density near the city while retaining the suburban landscape that Adelaide enjoys.

To conclude I am disappointed that the proposed Planning and Design Code has changed little from the previous (Labour) government's planning reforms and does little to maintain or enhance diversity in Adelaide. Here is a unique chance for the state Liberal Government to develop its own smart planning reforms while still achieving the desired outcome – to increase the population density of suburban Adelaide while retaining its unique inhabitability.

I therefore encourage the government to rethink the current plan so that it can promote its own inspired planning initiatives, or at least delay the implementation of the plan until some of these issues can be addressed.

Yours sincerely,

Graham Carpenter