

From: [Michael Kennedy](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Submission - Planning and Design Code - Phase 3
Date: Wednesday, 19 February 2020 9:52:23 AM

Thank you for the opportunity to comment on the proposed new *Planning & Design Code, Phase 3*.

Background

I live in Black Forest, which is home to a community of middle income professional, and business families who have invested their savings to live in a quality suburb.

As per the current City of Unley Development Plan, our zone is defined as **RB350**.

Proposed New Planning & Design Code – A fundamental change for Black Forest!

Under the proposed new Planning & Design Code, the current RB350 zoning for Black Forest/Clarence Park (west of East Avenue) is being transitioned into the *General Neighbourhood Zone*. This transition is Not “like for like” and is at odds with our surrounding suburbs, currently zoned RB350, which are being transitioned into the *Suburban Neighbourhood Zone* ⁽¹⁾.

(1) Source: Planning and Design Code Consultation Map Viewer - dpti.geohub.sa.gov.au.

Proposed Change to Black Forest Zoning, Submitted For Consideration

I propose that Black Forest/Clarence Park (west of East Avenue) be transitioned to the Suburban Neighbourhood Zone, with the current RB350 numerical values being used for the Technical Numerical Variation overlay, as supported by the City of Unley submission.

Note: This proposal is consistent with the proposed new zoning of surrounding suburbs and provides a transition with little change, as pre-empted by Hon Stephan Knoll, Minister for Planning, Transport and Infrastructure.

Such a proposed amendment will ensure a “like for like” transition into the new zoning arrangements and would address most of the contentious issues described below.

Impacts of Proposed New Zone on Black Forest/Clarence Park

The main contentious differences are:

1. **Dwelling Size.** The dwelling footprint is being reduced from 350sqm to 300sqm, while row dwellings are being set at 200sqm. This will accelerate the rate of land subdivision and lead to an **unsustainable** increase in the number of dwellings.
2. **Setbacks.** The front setbacks have been halved, from 10m to 5m. The side and rear setbacks have been left out of the proposal, leading to uncontrolled and controversial developments.
3. **Privacy.** The proposed decrease of sill height from 1.7m to 1.5m will erode further the privacy of individuals in their own property and impact family life.
4. **Sustainability.** The increased housing density will accelerate, impacting on liveability and sustainability by reducing tree cover and private open green spaces. This will drastically **increase urban heat**, impacting further on quality of life. The City of Unley already has the least amount of public open space in the whole metropolitan area.
5. **Street Canopy.** There will be a growing pressure to remove street trees to make way for new driveway access, again drastically increasing urban heat.
6. **Serviceability.** A population explosion will **strain established infrastructure**. Any upgrades required to accommodate the increased population density would be very onerous and extremely

difficult to provide within the confines of the existing landscape (traffic flow in traditionally narrow streets, restricted street parking, under resourced utilities, NBN congestion, local school capacity saturated with increased enrolment demand, etc.).

To summarise, it is clear from the above points that **Black Forest/Clarence Park (west of East Avenue) will be severely affected by the proposed changes**. This is in contradiction to the assurances of Hon Stephan Knoll, Minister for Planning, Transport and Infrastructure, that *the transition to the new zoning will occur with little or no change*.

Lastly, I would make a special request that you note, and advise the Minister Stephan Knoll, of my *concern regarding the short timeframe* around these proposals. I believe the implementation should be **delayed** to allow for detailed consideration of submissions and ***a further opportunity to comment on the revised Planning and Design code***.

Mary-Ann Kennedy



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