

From: [Grant Wilson](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: FW: SA new planning and design code
Date: Monday, 24 February 2020 8:59:31 PM

To whom it may concern,

We would like to make comment on the proposed new Planning & Design code.

We live in Clarence Park, on the western side of East Avenue. Our current zone, under the City of Unley Development Plan RB350, is being transitioned into the General Neighbourhood Zone. We are long time residents of Unley Council (since 1979), and expect to be protected, as are other zones in Unley Council. Contradicting the assurances of the Minister and the Commission Chair, that our zone would be transitioned into the new zone, with little or no change to my zone, are significant. So significant, that we suggest the 2 zones are not compatible. It will completely alter the feel of family homeliness in our zone.

The changes are so impactful that they depict the zone, in which we live, as a zone presenting for complete renewal. Changes that we trust are not intended, but which could see our population double in a short period of time. We are strongly opposed to the idea that one side of East Avenue will be affected, whilst the other side is not.

Not only has the area per dwelling changed from 350sqm to 300sqm, (or down to 200sqm for row housing), setbacks have been drastically changed. The front setbacks have been halved, from the current existing established setback of around 10m (suburban wide) to a mandatory 5m.

New developments will, under this change, be predominant in the streetscape. They will impact seriously on the visual amenity of the adjacent neighbours for years to come, creating streetscapes of conflict rather than the harmony that exists now. We reiterate, that we see one side of our street becoming less desirable and valuable. Side and rear setbacks do not exist in the draft. Surely, this is an error. Such, if included in the draft, will see the current spaciousness of our suburb disappear. Potentially, streets could become a series of row housing.

The current zoning allows for a 2 for 1 redevelopment of the average site in Black Forest/Clarence Park. The changes, that the draft indicates, would allow for most sites a 3 for 1 redevelopment opportunity. In many cases, particularly corner sites, this grows to 4 for 1, or more. We trust the Government/Commission is not intent on seeing a whole suburb with 3 houses on each property. We do not find this scenario acceptable, considering the improvements that have been made, over the years, to our properties. Such redevelopment potential will artificially increase the value of most properties in Black Forest/Clarence Park. Affordability, for other than developers, will result as properties that are currently within the reach of the average person, will no longer be affordable.

This results in Black Forest/Clarence Park realistically being not a like for like, but a zone that is seen as a regeneration zone. A zone with a potential to double the population. Doubling the population in an area with a road network and infrastructure that cannot sustain such. A 2 fold,

or even 3 fold increase, in the number of residential vehicles, on top of the existing number will see our streets become daily car parks. This is already an issue with properties close to the tram and train lines, and near cafes. The amount of roofed area is increasing from 50% to 60% of the site area, with private open space reducing from 20% to as little as 8%. This may work in a future Greenfields development, where open space is plentiful. It will not work in our neat and tidy garden suburb with established fruit trees and large green leafy trees. The amount of open space in the City of Unley is approx. 2.5%, which is already the lowest in the metropolitan area. The pressure would be on the City of Unley, to create more open space, which would be a significantly costly exercise.

Overlooking restrictions have been reduced from 1.7m cill height on 2nd floor windows to 1.5m cill heights. An average person can see over a cill height of 1.5m with ease, effectively eliminating the effort to minimise overlooking.

Increasing the width of carports from 30% of the frontage of the site to 50% will see carports/garages dominate the streetscape.

We already have unacceptable parking issues, since parking time restrictions were implemented at the Northern end of East Avenue. Between the train line and Kelvin Avenue, East Avenue has attracted daily train commuters who leave their cars outside (and sometimes too close to driveways) our properties all day, 5 days a week. The street is busy enough, without us having to back out with less than a full view of approaching traffic.

Local Councils understand the issues that face it's ratepayers. We understand that it is the Parliament's intention to remove/restrict the input that Councils will have in the future with changes to the Code. Councils (Local Government) are surely best placed to actually be the driver of investigations into future changes. They have the empathy with the amenity of the community that state Government Departments can't have.

This is currently being demonstrated with the City of Unley's in depth analysis of what appears to be a draft Code full of errors and omissions. An Analysis without which the new Code potentially would have been so disastrous as to destroy the amenity of the suburbs of Adelaide, and in particular, our suburb. Likewise in their leading the Development Plan Amendment in the Life Care, Norman Terrace Precinct.

The ability of local councillors/local government who engage with the community in both exercises demonstrates that they are far more equipped to conduct community consultation, than is the department. We request, in all sincerity therefore, that you respect the role that Local Councils can and do provide. Please, not only re-include them in the process, but consider allowing them to be the driver of future considerations for change.

We trust that the intention of the Government is not for the RB350 zone to be a regeneration zone, that it was meant to be transitioned like for like. This being the case, then the numerical discrepancies noted in our submission are in error, and not deliberate.

If in error, this may reflect that the Government is under severe pressure to put this mammoth exercise together in the time frame the parliament has decreed.

We ask the Parliament to provide the Commission with an extension of time, to ensure that errors and omissions do not see their way through to actual development. Any resultant and unexpected abhorrent development that might occur as a result of not going through due process, will surely impact on the Government's re-election chances.

Kind regards

Anne & Grant Wilson

[REDACTED], Clarence Park

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