

From: [Alan](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Proposed change to planning zone applicable to Black Forest.
Date: Wednesday, 19 February 2020 8:48:00 AM
Attachments: [Submission on PDC - AG .pdf](#)

I wish to support the submission prepared by the City of Unley, particularly the observations on their part that the current RB350 zone be transitioned into the Suburban Neighbourhood Zone. And, in so doing, the current RB350 numerical values be used for the Technical Numerical Variation overlay.

A detailed submission is attached.

Regards,
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Opening Observations

Thank you for the opportunity to comment on the proposed new Planning & Design Code.

I live in Black Forest. My current zone, under the City of Unley Development Plan RB350 is being transitioned into the General Neighbourhood Zone.

I understood that in most cases existing zones are to be transitioned into the new zone structure with no substantial change to acceptable land use. This understanding is based on comments from the Commission Chair eg in DPTI Newsletters and from statements contained in published DPTI materials eg the FAQ document.

However, the changes to my zone are very significant. So significant, that I suggest the new zone is simply not compatible with the existing zone.

The changes have such high impact, that they imply the zone in which I live is up for complete renewal. Changes that I trust are not intended, but which could see the population of the suburb double in a short period of time.

Changes and the impact of these changes on Black Forest.

Not only has the area per dwelling changed from 350m² to 300m², (or down to 200m² for row housing), setbacks have been drastically changed. The front setbacks have been effectively halved, from the current existing established setback of around 10m (suburban wide) to a mandatory 5m.

New developments will, under this change, be very dominant in my 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.

Minimum side and rear setbacks do not exist in the draft. This is surely in error. If this is included in the final draft, it will see the current spaciousness of my suburb disappear. Potentially, streets could become a series of row housing.

The current zoning already allows a 2 for 1 redevelopment of the average lot in Black Forest. However, the changes that the draft indicates, would allow most sites to be redeveloped on a 3 for 1 basis. In many cases, particularly corner sites, this grows to 4 for 1. I trust the Government and the Commission are not pursuing a goal on seeing the whole suburb with 3 houses on each lot.

Such redevelopment potential would increase the value to developers and render existing houses unaffordable to the sort of average families who currently choose to live in Black Forest.

This results in Black Forest not being rezoned to anything resembling the existing situation, but rather to a zone that is more akin to a regeneration zone. A zone with the potential to double the population.

As is typical in the neighbouring suburbs, Black Forest was laid out with relatively deep blocks, and street frontages of 15m are typical. Greatly increasing the number of residences would have a large negative impact in the streets through increased traffic volume and on-street parking while kerb space is reduced by additional driveways. The road network and infrastructure cannot sustain this.

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 public open space is plentiful. It cannot however work in an infill environment where existing public open space is very limited. This is particularly true in the City of Unley which (at around 2.5%) has the least amount of public open space in the whole metropolitan area. This would place pressure on the City of Unley to find more open space, which would be a very expensive undertaking.

Restrictions on overlooking have been reduced from 1.7m sill height on 2nd floor windows to 1.5m sill heights. An average height person can see over a sill 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 particularly when if this is combined with a reduction in front setback from 10m to 5m.

The General Neighbourhood Zone has no numerical variation overlay which could be used to address the issues raised above.

Proposed Alternative

In contrast to the General Neighbourhood Zone, the Suburban Neighbourhood Zone allows for numerical variation overlays. This zone provides the opportunity for the Commission to reflect the public promises being made to transition zones like for like from the Council Development Plan to the Planning & Design Code.

I wish to support the submission prepared by the City of Unley, particularly the observations on their part that the current RB350 zone be transitioned into the Suburban Neighbourhood Zone. And, in so doing, the current RB350 numerical values be used for the Technical Numerical Variation overlay.

Council as a preferred driver of Development Policy into the future

I understand it is the Parliament's intention to remove/restrict the input 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 containing many errors and omissions. Without this analysis the new Code may well have facilitated the destruction of amenity in Adelaide's suburbs, and in particular my suburb.

Council's ability to engage with the community demonstrates they are much better equipped to conduct community consultation than is the DPTI.

I request therefore that you respect the role that 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.

Finally

I trust the intention of the Government is not for the RB350 zone to be reclassified as a regeneration zone and that it is meant to be transitioned without substantial change. If this is the case, then I accept that the numerical variations noted in my submission are the result of errors, and were not deliberate.

However, if they were in error, this perhaps reflects that the Commission is under severe pressure to put this mammoth exercise together in the impractically short time frame that parliament has decreed.

Therefore I ask that Parliament provide the Commission with an extension of time to ensure that errors and omissions do not see their way through to actual development. You can be sure that voters will look badly on a Government that, through inadequate preparation, implements changes that result in inappropriate or objectionable development in their neighbourhood.

Submitted by

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