

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

**Planning and Design Code
State Planning Reform for South Australia**

As a long term resident of Black Forest, I am gravely concerned about and opposed to the nature of the proposed replacement zones and policy content in the new Planning and Design Code. The scope, scale, detail, complexity and consequences of the new draft Code is substantial. There are many errors, omissions and transitions which will have a negative and unwarranted impact on the amenity and quality of life that is currently valued by my family and other local residents.

I bought into this suburb 25 years ago, attracted to the area due to its character homes, large block sizes, Jacaranda streetscapes and community feel. The omission of having Black Forest and Clarence Park transitioned into the Suburban Neighbourhood Zone in the new code invites a much higher degree of infill which will irrevocably change our suburb and we will no longer be able to protect what we value so dearly.

Within the last 5 years, I have witnessed the degradation of these amenities through unsympathetic infill through replacement of one single character dwelling with two poorly designed, profit-orientated developments. We are losing our open spaces, our trees, our biodiversity and connection to the natural world as a result of current infill development. Trees are an intergenerational asset and one that contributes so significantly to our neighbourhood amenity. This current low-density infill is having an impact on excessive on-street parking, water catchment management, issues of privacy and overshadowing. The proposed transition to the General Neighbourhood Zone will allow three for one or potentially four for one development to occur, with little consideration given to the appropriateness of such infill within a character-filled suburb. We should not be compared to recent greenfield developments (Blakeview, Seaford Meadows) where infrastructure is designed and constructed to support medium-density living. The General Neighbourhood Zone would see our block sizes being carved up and

overdeveloped in a manner that is unsuitable for our current infrastructure and essential and community services.

There is no doubt that change is inevitable and development will occur to match the needs of our changing society. Yet Government has an obligation to ensure that development provides a framework whereby suburbs and communities should be designed or maintained to provide a standard of living that is socially, economically and environmentally responsible. I strongly believe that the intrinsic, unique character of our suburb is being sacrificed as a result of these impending changes. The Community Engagement Charter highlights that it will provide a framework that will “foster better planning outcomes that take account of the views and aspirations of communities”. I hope that this submission, and those made by other members of our community, highlights that our views and aspirations wish to retain the existing parameters that apply to our local council planning policies.

Our current RB350 zoning provides consistent, although still subjective, parameters on site area, dwelling types, frontages, boundary set backs, open space allocation and building heights. The proposed change to have Black Forest and Clarence Park included in the new, basic, General Neighbourhood Planning and Design Code Zone is inconsistent with zones for similar surrounding and adjacent council areas, including Glandore and Clarence Gardens. Current numerical values will not apply, land use will include more non-residential proposals, site area will be decreased. The potential for an additional 1000 homes within our suburb is alarming and completely inappropriate. The current character of our precinct should be respected, valued and upheld.

The diversity of our cities, neighbourhoods and communities represent different histories, geographies, topographies and local aspirations. I agree with Unley Council’s adage that any state-wide planning code should provide scope for “a degree of diversity through discretionary local specific policies and the reflection of local places and context”. This local, common understanding for appropriate development is a key aspect that will be missing from the new code as we move to a generic, state-wide policy. There must remain some scope for the acquired knowledge and understanding that local councils have for their constituents and specific contexts.

I believe the code, as it stands, should not be implemented. There are inconsistencies, errors and omissions which will, if ratified, negatively affect the future of many South Australian residents. Given its complexity, scope and significance it is a document and policy that deserves to be given the time and consideration commensurate with the gravity of its implications.

I urge the Commission to provide a simple, common sense solution that meets the assurances given by the Minister that there would be no change to our current level of zoning. Black Forest and Clarence Park should be classified as Suburban Neighbourhood Zones, in line with the

neighbouring suburbs, and retain the existing numerical overlays that are governed by our Unley Council policies.

I thank you for your time and consideration in reading my submission.

Rachel Merritt
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