

Minister for Transport, Infrastructure and Local Government
Minister for Planning
The Honourable Stephan Knoll MP
GPO Box 1533
Adelaide SA 5000
[REDACTED]

CC: The Honourable Jane Stinson, Member for Badcoe - badcoe@parliament.sa.gov.au,
The Honourable David Pisoni, Member for Unley – unley@parliament.sa.gov.au,
Chief Executive, Department for Planning, Transport and Infrastructure
DPTI.PlanningReformSubmissions@sa.gov.au

RE: Proposed Planning and Design Code – City of Unley Area

Dear Minister,

You would recall the meeting held on Wednesday 23rd October 2019 at the Eastwood Community Centre addressed by yourself and the Chair of the State Planning Commission focusing on heritage, character and other community matters. At that meeting, it was refreshing to hear certainty that there would be little or no change to the City of Unley Development Zone RB350 under the proposed new Planning & Design Code.

Your attention is drawn to the current Draft Planning and Design Code documents; these are at odds with comments made at the above meeting which are of monumental concern to many of the Black Forest and Clarence Park community.

Ministers should not need exact knowledge of draft proposals, that is up to others, but why should the Black Forest and a small area of Clarence Park be treated so differently to adjacent areas? The current Draft Planning and Design Code identifies Black Forest and a small portion of Clarence Park as “General Neighbourhood Zone” whereas adjacent areas are identified as “Suburban Neighbourhood Zone”. Could this be a simple oversight? To the residents impacted the designation feels as though the area is being excised, enclaved, or punished even.

Ministerial intervention is requested to instruct the authors of the Draft Planning and Design Code to remove this class casting departure.

While the rhetoric behind the vision of a *single set of planning rules* is to *enable high-quality development across the State*, the fact that tax/ratepayers have funded and assisted with development plans for their specific area suggests that different areas of the State require different plans to meet the needs of individual communities, rather than what is delivered by a centralised computer hosted on a cloud somewhere in the world.

And whilst it may seem confusing to have 72 individual council development plans, how many architects, builders or developers have needed to fully understand each one of them? And how much of the individual plans are common? Maybe a computer programme that highlights the differences would be helpful.

The Draft Planning and Design Code proposes the use of Private Certifiers (rather than Council) to approve applications. This can only lead to a raised level of corruption by those wishing to apply influence or persuasion on Certifiers to approve their plans. And, how can a Private Certifier with no intimate appreciation of an area make a judgement on development in a completely different area to that which they are accustomed?

Please take a short drive down Churchill Road in Prospect to see what relaxing planning rules have done. If these developments are an example of what the new Planning and Design Code regards as “*high-quality developments*”, forget pride, forget Adelaide as being considered as a “*nice*” city to live and bring up young families.

While reading the proposed new Planning and Design Code I may have missed reading about the increased *infrasound* and how resulting medical issues might be managed. Or how increased on-street parking and noise is to be addressed. And making clear who pays for upgrading old infrastructure.

Adelaideans’ and our country counterparts do not want Adelaide to be another Sydney, Melbourne or London. There are many other options, but the proposed new Planning and Design Code makes it easy to erect cheap, inappropriate buildings with a focus on monetary gain.

A single set of planning rules only favours developers, and the indolent whose empathy with the local area is zero and aim is to profit.

Please consider a family that has lived in the same house for 25-30 years to have three or four two story units built on the neighbouring block of land with the diversity of issues that presents to the adjacent families. Or as I have experienced the building of a totally inappropriate house opposite, built for rental profit, nothing more. The practice of building on the boundary must be abolished. The proposed new Planning and Design Code does nothing to preserve character areas of Black Forest and excised part of Clarence Park from these hideous inappropriate developments and practices.

The Black Forest and excised part of Clarence Park must be transition to a Suburban Neighbourhood Zone.

The proposed new Planning and Design Code, should it be implemented must:

- Preserve what is left of the Black Forest and excised part of Clarence Park character.
- Require boundary setbacks to remain unchanged.
- Site area to be 350sqm or greater.
- Sill heights to be 1700mm to limit overlooking – one’s privacy is paramount.
- Garage/carport widths remain at 30% or less.
- Allow the City of Unley to remain the approver of Development Applications and driver for Development Amendments should they be required.
- Any future proposed changes to zoning must include genuine consultation with property owners and the residents of the impacted area.

