

**Submission to Department of Transport, Planning and Infrastructure regarding the proposed Planning and Design Code for Phase Three for South Australia**

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I have lived at my present address for 36 years. As a biologist, I have enjoyed the neighbourhood with its leafy gardens and biodiversity.

I appreciate the opportunity to comment on the proposed Planning and Design Code. In principle, a new Code should provide more consistency across the State in terms of planning and development but it appears to have been rushed in order to meet the 1 July 2020 deadline. In its present form, the Code contains many issues that need to be addressed but because it is so long and complex, I have restricted my comments primarily to how it relates to my neighbourhood of Black Forest.

In a submission to Unley Council in 2014 regarding proposed rezoning, I provided evidence that Dryden Road had equal, if not more, historical character than neighbouring suburbs proposed as Residential Streetscape (Landscape) suburbs such as Forestville, Everard Park and Goodwood. Black Forest also had large allotments with gardens that provide much-needed green space. For these reasons, it should not be considered for higher density living (*i.e.* General Neighbourhood) in the new Code.

The Government of South Australia is committed to helping South Australians conserve, sustain and prosper. Large gardens and public green spaces are key to sustaining the natural urban environment of Adelaide. They provide habitat to maintain biodiversity and they contribute to lessening the effects of climate change. In our large garden at 24 Dryden Road, we have recorded more than 50 species of native birds, 11 species of native butterfly and at least 3 species of native mammal.

The proposed Planning and Design Code recommends changing Black Forest from RB 350 (Unley Council) to General Neighbourhood which will lead to high density living. There is great **potential for overdevelopment** because many of the criteria in the Code are not prescribed. For example, side and rear setbacks have not been documented for General Neighbourhood. In addition, under General Neighbourhood site areas would be 200–300 m<sup>2</sup> compared with 350 m<sup>2</sup> under RB 350 or by numeric variation overlay under Suburban Neighbourhood.

To maintain the present character and biodiversity of suburbs now in the RB 350 zone, (*e.g.* Black Forest and Clarence Park), these should be transitioned into Suburban Neighbourhood under the proposed Code.

Increasing population density of Black Forest (and other RB 350 areas) will inevitably lead to greater heat production, more use of energy, more traffic congestion, more parking issues and reduced quality of life for its human population.

Under the proposed Code, private certifiers will be authorised to approve applications. This is likely to have a detrimental effect on suburbs like Black Forest because they may not live locally and therefore do not have the same empathy for the area as a local Council would.

## **Conclusions**

- 1) If adopted in its present form, the Planning and Design Code will be more than a transition — it will result in change to Adelaide (in the top 10 most liveable cities in the world), some of which will be damaging.
- 2) Black Forest and other RB 350 zones should be transitioned into Suburban Neighbourhood to preserve their character, liveability and biodiversity and to maintain consistency with neighbouring suburbs.
- 3) The implementation of the Code should be delayed (as per the Greens bill to Parliament in November 2019) so that errors and omissions to be rectified.