

COMPLETE

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Page 1: Planning and Design Code for South Australia

Q1 Which part of the Planning and Design Code would you like to make a submission about?(Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)

My submission relates to Urban code. (click here for council areas)

Page 2: Planning and Design Code for South Australia Personal Details

Q2 Please provide your contact details below (Name, Postcode & Email are mandatory)Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name **Roger Freeman**
Address [REDACTED]
Your Council Area **Unley**
Suburbs/Town **Black Forest**
State **SA**
Postcode **5035**
Country **Australia**
Email Address [REDACTED]

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Q3 Which sector do you associate yourself with?

General Public

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Q4 Would you like to make comment on

**Specific Topics for example : - Rules of Interpretation
- Zones and Sub-zones - Overlays - General Provision - Mapping Land Use Definitions - Administrative Definitions - Referrals - Table of Amendments**

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Q5 Enter your feedback for Rules of Interpretation

Respondent skipped this question

Q6 Enter your feedback for Referrals

Respondent skipped this question

Q7 Enter your feedback for Mapping

Respondent skipped this question

Q8 Enter your feedback for Table of Amendments

Respondent skipped this question

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Q9 Please enter your feedback for overlaysclick next at the bottom of the page for next topic

Respondent skipped this question

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Q10 Please enter your feedback for zones and subzonesclick next at the bottom of the page for next topic

General Neighbourhood Zone

Opening Observations Thank you for the opportunity to comment on the proposed new Planning & Design Code. I live in Black Forest/Clarence Park (west of East avenue). My current zone, under the City of Unley Development Plan RB350 is being transitioned into the General Neighbourhood Zone. 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 the changes to my zone are significant. So significant, that I suggest the two zones simply are not compatible. The changes are so impactful that they depict the zone in which I live as a zone presenting for complete renewal. Changes that I trust are not intended but which could see our population double in a short period of time. Differences and the Impact of these differences on Black Forest/Clarence Park. 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 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. Side and rear setbacks do not exist in the draft. This is surely in error. Such if included in the final draft will see the current spaciousness of our suburb disappear. Potentially streets could become a series of row housing. The current zoning does allow 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. I trust the Government/the Commission is not intent on seeing a whole suburb with 3 houses on each property. Such redevelopment potential will artificially increase the value of most properties in Black Forest/Clarence Park. Unaffordability, 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. 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 does not and cannot however work in an infill environment where public open space is minimal. Particularly 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 significantly costly exercise. Overlooking restrictions have been reduced from 1.7m sill height on 2nd floor windows to 1.5m cill heights. An average height 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. Summary The General Neighbourhood Zone has no numerical variation overlay. The Suburban Neighbourhood Zone, on the other hand, does. 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. My request then is 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. That, 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 what 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 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 my suburb. Likewise in their leading the Development Plan Amendment in the Life Care, Norman Terrace Precinct. Their ability to engage with the community in both exercises demonstrates they are far more equipped to conduct community consultation than is the department. We request in all sincerity therefore that you should 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 a regeneration zone, that it was meant to be transitioned like for like. However, this is certainly not

what is proposed in the current draft as outlined above. If in error, this may reflect that the Commission is under severe pressure to put this mammoth exercise together in the time frame the parliament has decreed. I 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.

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Q11 Please enter your feedback for general policyclick next at the bottom of the page for next topic

Respondent skipped this question

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Q12 Please enter your feedback for Land use Definitionclick next at the bottom of the page for next topic

Respondent skipped this question

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Q13 Please enter your feedback for Admin Definitionsclick next at the bottom of the page for next topic

Respondent skipped this question

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Q14 Please enter your general feedback here

Respondent skipped this question

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Q15 Do you have any attachments to upload?(pdf only)

Submission.pdf (429.3KB)

Notes for template submission on PDC

Opening Observations

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

I live in Black Forest/Clarence Park (west of East avenue). My current zone, under the City of Unley Development Plan RB350 is being transitioned into the General Neighbourhood Zone.

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 the changes to my zone are significant. So significant, that I suggest the two zones simply are not compatible.

The changes are so impactful that they depict the zone in which I live as a zone presenting for complete renewal. Changes that I trust are not intended but which could see our population double in a short period of time.

Differences and the Impact of these differences on Black Forest/Clarence Park.

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.

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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.

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 does not and cannot however work in an infill environment where public open space is minimal. Particularly 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 significantly costly exercise.

Overlooking restrictions have been reduced from 1.7m sill height on 2nd floor windows to 1.5m cill heights. An average height 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.

Summary

The General Neighbourhood Zone has no numerical variation overlay.

The Suburban Neighbourhood Zone, on the other hand, does. 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.

My request then is 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. That, 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 what 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.

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