



# ST PETERS RESIDENTS ASSOCIATION INC.

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Representing the Residents of St Peters, College Park, Hackney, Stepney, Maylands, Evandale & Joslin.

## SUBMISSION TO GREATER ADELAIDE REGIONAL PLAN (GARP)

### **General Comments**

The St Peters Residents Association (SPRA) notes that immigration is running at a very high level, with Australia leading the world in its rate of immigration-induced population growth. An extra half a million people were added in the past 12 months. This is putting enormous pressures on our cities and housing supply with soaring rates of homelessness and people unable to find rental accommodation. While we understand that the State Planning Commission (SPC) has no control over our population growth, we submit that as the State's key land use planning body, it has a responsibility to report to the State Government on community concern over large pressures on our land supply and housing needs.

We appreciate that household formation rate, as well as population growth, impacts on demand for new housing. However, community concern over population growth cannot forever be swept under the carpet. The forecasted need for an extra 300,000 dwellings in the Greater Adelaide region over the next 30 years demonstrates a need for a major increase in our current housing stock. Extra housing will be traded off against residential amenity, the natural environment, open space, agricultural land and the tourism attractions of this State. Politicians may think endless population growth is a good thing, and that you can maintain an ever-growing population while achieving a better environment, but public servants and members of Planning Commissions have a duty to remind them of reality and the costs which non-stop population growth brings.

The Discussion Paper suggests we plan to accommodate a high population growth projection of 670,000 for Greater Adelaide by 2051. However, a median growth projection of about 500,000 may be more plausible. Undue pressure may be placed on agricultural land, employment lands, the environment and open space by planning for the highest population growth projection.

SPRA is pleased that the SPC is proposing to spread the burden of extra new dwellings which may be needed in this State over the next 30 years. Spreading the load between infill housing, some greenfield site development and satellite cities is a good thing. However, we note that although the targeted burden falling on the existing suburbs for new infill has fallen from 85 per cent of new housing to 70 per cent, this is still a high proportion of the new housing to be built.

We support more emphasis on selecting sites for Strategic Infill rather than piece-meal, ad hoc infill. We value the Discussion Paper's recognition of the importance of protecting historic

and character residential areas. It is important that infill housing does not undermine the valued character of these areas.

SPRA submits that before any more land is re-zoned in the Norwood Payneham and St. Peters Council area, land that is already zoned to allow multi-storey infill apartments should be used up. This land includes the southern side of North Terrace Kent Town and The Parade Norwood, as well as parts of Kent Town. Post-war suburbs in the Payneham/Firle areas also allow for up to three storey residential development which has generally resulted in two storey development. Multi-storey housing developments on The Parade should adhere to height limits in the Planning and Design Code as High Streets like The Parade require sensitive development which does not overwhelm the human-scale street level shopping precinct which attracts many visitors and tourists.

We understand that three types of infill, and sites suitable for them, are to be investigated by the Commission. These are **Strategic Infill, Corridor Growth and Neighbourhood/Centre Infill**.

Areas denoted for possible **Strategic Infill** Sites include the Stepney Triangle, a light industrial area containing a few remnant 19<sup>th</sup> century cottages, many businesses and two three storey apartment blocks. Now classed as an Employment Zone, the Stepney Triangle supports a range of food and beverage manufacturing businesses which have increased in number in recent years. These businesses are likely to be forced out of the area if it is re-classified to a Strategic Infill site.

Areas to be investigated for possible **Neighbourhood/Centre Infill** include land formerly used by the Department of Transport for a carpark next to the River Torrens and adjacent to the River Torrens Linear Park. This land, off Holton Court St Peters, is in an area rich in urban wildlife (including koalas). The Norwood Payneham & St Peters Council has approached the government in the past with a view to adding this land to the open space next to the Torrens River. A large infill apartment complex on this sensitive riverine site has the potential to add a great deal of pollution to the river and to decimate the local environment and its wildlife. We also understand that the former Department of Transport carpark is built on fill, due to the history of sand and gravel mining along the River Torrens, followed by its use as a rubbish dump. This land should be added to the Linear Park and MOSS.

The Caravan Park on Richmond Street has also been suggested as a site for Neighbourhood/Centre Infill investigation. An error has been made in the mapping of this site. The detailed Commission map shows the area includes the adjacent Twelftree Reserve, a public park owned by Norwood Payneham & St Peters Council. This should be corrected.

The Caravan Park site was zoned for multi storey redevelopment under former Planning Minister John Rau. Caution should be exercised in approving multi-storey residential development on this site, particularly towards the river cliff face at the rear of the site. These cliffs are not stable, and any housing development should be set well back from the cliff face. In nature, cliffs erode due to wind, rain and earth movements and it may not be wise to try to pin them down in the one place with overly enthusiastic large housing developments. However, there should be provision made for the continuation of the Linear Park walking / cycling track along the riverbank behind the caravan park. The lack a track requires walkers and cyclists to cross the river or to negotiate the narrow Richmond Street in Hackney.

In relation to **Neighbourhood Infill**, we urge the Commission to tighten up controls on so-called “normal” infill, as this is uncoordinated and ad hoc, which often inflicts significant amenity and environmental costs on neighbours and local areas. These costs are outlined later in this submission.

**Corridor growth infill** on arterial roads to be investigated include all of Payneham Road, Magill Road and Kensington Road. We submit that these roads adjoin many Historic Overlay and Character Overlay Areas that are full of historic and character garden suburbs with predominantly single storey dwellings set in relatively spacious gardens. With properties fronting these main roads being largely single allotments there will not be enough space, in many cases, for multi-storey apartment dwellings to be erected.

Proposed areas of investigation for “**Mass Transit**” include Magill Road, The Parade and Kensington Road. These roads are congested at peak periods. It is not clear what “mass transit” involves.

This Discussion Paper should be integrated with the recently released Infrastructure Plan, as well as with a Transport Plan. Coordinating the provision of infrastructure with land use planning is critical.

We submit that local councils should be involved in the scoping for detailed investigations into future housing development land. Local knowledge and support are important. Good design principles for new housing are also important and should be included in the Planning and Design Code.

## Questions from the GARP Summary Paper

### ***How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?***

- A range of dwelling accommodation types including detached dwellings, row housing and low-rise (3-4 storey) apartments is desirable but please don't stack 10-12 storey flats on to greenfield sites. Good design is important.
- There is a need to attract commercial activity without detracting from residential amenity. You need a good economic base otherwise you will have to admit that the Living Locally is a pie-in-the-sky ideal.
- Needed will be land for public open space so that good parks, lakes and local sports and entertainment support Living Locally and reduce the need for residents and workers to travel long distances.
- Reliable public transport is essential.

### ***What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?***

- A variety of housing types in different areas.
- Historic and character areas to be protected.
- Substantial street trees and parks are a must.
- Better public transport.
- Row housing, along with detached housing, semi-detached dwellings and low-rise apartments.
- The historic character of these towns must be protected to support the tourism industry and the preferences of residents.
- Don't built 10 storey blocks of flats in them.
- Good design will be essential for new housing.

### ***What do you see as the benefits and potential drawbacks of greenfield development?***

#### **Potential benefits:**

- Greenfield development will provide detached houses (hopefully with gardens and trees) for families to live in (children can play safely in rear gardens without adult supervision).
- Detached dwellings are most popular for people raising children.
- More choice of housing types and site areas (hopefully not all tiny allotments with cheek-by-jowl housing).
- Cheaper (in the short-term)

#### **Potential drawbacks:**

- Poor quality design.
- Small allotments and dwellings crammed together with little room for trees or gardens and little space for street trees.

- Loss of mature trees and wildlife as trees are cut down to make way for new development. Every effort should be made to retain established trees and to develop around them.
- Loss of agricultural land.
- Greater distances to travel to work and shopping if few job opportunities are available and local shopping choices are restricted.
- Need for more infrastructure including public transport, child care, schools, medical facilities, roads, water, sewerage, electricity, street trees.
- Perhaps more social isolation until strong sense of local community developed (a big role for local councils).
- Loss of character of small towns if greenfield development result in what is termed “sprawl” and small towns are linked up becoming one big urban conglomeration.
- Should be green belts between small towns and these should be protected from residential development.
- The British manage to protect their small towns with green belts so we should learn from overseas experience.

***Where is the next generation of strategic infill sites?***

- There are many former light industrial areas in the western suburbs and some of these should be suitable for Strategic Infill development.
- Examples include the former Coca Cola site, Bowden-Brompton and parts of Port Adelaide.
- The Elizabeth Shopping Centre has been suggested too as suitable for a major Centre infill re-development.

***How can infill development achieve an urban form that is consistent with the principles of Living Locally?***

- Strategic infill is more desirable than piece-meal infill as it is better planned and designed and may have more government oversight over it.
- Can live and shop and even recreate locally but needs to be near centres of economic activity (Even Bowden-Brompton residents probably have to leave the site to go to work)

***What do you see as the benefits and potential drawbacks of infill development?***

**Potential benefits: Ad hoc infill:**

- More dwellings

**Potential drawbacks: Ad hoc infill:**

- Loss of trees, loss of gardens, loss of open space, loss of urban wildlife (birds, possums, lizards etc.), hotter microclimates in summer, more noise (especially from backyard (hammerhead, battle-axe development), more conflict between neighbours
- More cars parked on streets and less parking available for visitors and tradesmen, more driveways across footpaths and less space available for street trees,

- Extra load on existing infrastructure (water, electricity, roads) .
- Extra stormwater for councils to dispose of means they will have to invest huge sums of money (usually borrowed) into laying bigger water pipes underground.
- May be poorly designed.

**Potential benefits: Strategic Infill:**

- More dwellings, more coherent in style, well planned.
- Stormwater usually recycled.
- Better landscaping and open space provided.

**Potential drawbacks: Strategic infill:**

- May require heavy government subsidies (eg Bowden-Brompton).
- May be relatively isolated from surrounding neighbourhood, extra loneliness of the older apartment-dweller.
- Needs to be well integrated with transport and infrastructure planning.
- If imposed from on high may not be popular in a local community.
- Need to negotiate with local community, where possible.

***What are the most important factors for the Commission to consider meeting future demand for employment land?***

- Population growth and distribution
- Work from home trend
- Type of industry/commercial development doing well/diminishing
- Transport networks.

***What are the most important factors for the Commission to consider meeting future demand for open space?***

- Population growth and size
- Climate change (urban heat island effect when vegetation is replaced with buildings)
- Demographics
- Changing technologies
- Rate and amount of housing densification
- Urban biodiversity needs (noting that biodiversity is in decline across Australia).