



ST PETERS RESIDENTS ASSOCIATION INC.

E-mail : info@stpeters.asn.au

ABN 86 794 177 385

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

Mr Craig Holden,
Chairman, State Planning Commission
Via email plansasubmissions@sa.gov.au
4th November 25024

Submission on the Greater Adelaide Regional Plan

Dear Mr Holden,

Our comments on the Greater Adelaide Regional Plan (GARP) 2024 are as follows: -

1. Projected population growth:

We note that the Federal Government has permitted Australia's immigration intake to blow out to unsustainable levels, with the additional 1.2 million people added to our population in two years, creating a housing crisis. The eastern cities of Brisbane, Sydney and Melbourne, which take most of this intake, are groaning under the weight of population growth and the undue pressure this is placing on their residential areas in terms of loss of character and amenity as high-rise apartment blocks continue spread to cater for housing needs.

Our State Planning Commission head Craig Holden has pointed out that since 2011 the Greater Adelaide region has received 167,000 new residents and states that "this is modest population growth compared to other Australian capital cities" (Introduction to GARP Summary document). This claim is not wholly correct insofar as the capital cities of Darwin, Canberra and Hobart have experienced a lower rate of population growth than has the Greater Adelaide region. We acknowledge that the east coast cities Brisbane, Sydney and Melbourne have experienced considerably higher population growth than we have.

The projected population increase of 670,000 from 2021 to 2051 appears to be a high projection. As we stated in our submission to the 2023 version of GARP, a median population growth projection of 489,000 may be more plausible. Undue pressure may be placed on agricultural land, residential areas, employment lands, the environment and open space by planning by the highest population growth projection.

The Greater Adelaide Regional Plan imposes a target figure on our council, the City of Norwood Payneham & St. Peters, for an extra 4,700 dwellings to be built from 2021 to 2051. This averages out to about 160 dwellings a year, which seems ambitious. Post COVID supply constraints continue to hamper the building industry, as well as high wage costs, high energy costs and interest rates which have not yet come down due to inflationary pressures.

2. Multi-storey dwellings on main roads / Corridor Infill.

We note that these are proposed as “for investigation” with some roads and areas to be considered by the State government as “State Significant”, with some other areas to be investigated by local councils as to their suitability for infill development.

GARP comments on “State Significant” roads proposed for additional housing supply:

Fullarton Road: “Corridor development along Fullarton Road providing for a variety of housing choices within walking distance of services and high-frequency public transport, with regenerated neighbourhood surrounding the community centre to provide Missing Middle housing” (GARP Infill Development)

Kensington Road (and The Parade): “Corridor development along Kensington Road (and The Parade) providing for a variety of housing choices within walking distance of services and high-frequency public transport. (GARP Infill Development)

Magill Road, Glynburn Road and Payneham Road in the GARP Urban Infill document.

It seems a dubious claim that all these roads are “within walking distance of services”. An elderly person housed in a multistorey flat on Glynburn Road, for example, may have a lengthy walk to a shop or shopping centre.

Linear housing development on major, heavily trafficked, and polluted roadways are not ideal living conditions.

As well as people living in these apartments often being some distance from shops and other services, apartment blocks can create major problems for their tenants in other ways. Owners living next to renters may create conflicts, such as the elderly lady living in her apartment in the converted ETSA building (Air Apartments) on Greenhill Road who found out her rental neighbour was a WFH prostitute.

Multistorey residential towers are heavy emitters of greenhouse gases as they require lighting and air-conditioning operating 24 hours a day.

Elderly people may find living in them lonely.

We submit that apart from Glynburn Road, these roads adjoin many Historic Overlay and Character Overlay Areas, full of historic and character garden suburbs with predominantly single storey dwellings set in landscaped gardens. With properties fronting these main roads being largely single allotments, there will not be enough space, in many cases, for multi-storey apartment buildings to be erected. Even where larger sites can be obtained, the construction of multistorey apartment towers are very likely to have a negative impact on the character and amenity of adjoining or near-adjoining properties.

We urge the Planning Commission to conduct a study of what happens to residents living in single-storey houses at the rear of the multistorey apartment blocks, such as those recently built on Prospect Road and Churchill Road.

Utter ruin, devastation, and chaos? Does anyone care about this interface?

We draw the attention of the State Planning Commission to the lengthy and difficult struggle residents in First Avenue Joslin had in opposing the Life Care proposed 7-storey retirement complex on the corner of Lambert Road and Payneham Road in 2016-2018. While the residents of First Avenue Joslin were considered to have won their battle, they still ended up with a large imposing three storey building (looking rather like a giant ocean liner) looming over their back-gardens. First Avenue in an Historic Overlay Area.

Under the proposed Corridor rezoning, will such residents be silenced in future?

Community anger, should it arise, will have no avenue to express itself in what may be an increasingly authoritarian Regional Plan. We submit that public consultation should be compulsory for all Corridor Zone development applications where they adjoin a residential zone and that appeal rights should be restored to residents where Planning Code height limits are exceeded.

We submit that multi-storey housing developments on the Parade, Norwood, should adhere to height limits in the Planning and Design Code. High Streets like The Parade require sensitive developments which do not overwhelm the human scale street level shopping precinct which attracts many visitors and tourists. To date it seems that more nuanced height limits have been swamped by the Code allowing extra heights to developers for affordable housing, landscaping, heritage conservation and so on. A one-size fits all approach to planning decisions will, unfortunately, lead to poorer quality planning outcomes. We submit that rather than 'bonus' heights being allowed, there should be a 'penalty' loss of height for not providing these requirements.

3. Other "State Significant" infill areas (Inner Metro)

Stepney and Kent Town, (urban renewal area):

"Strategic employment and housing opportunity on the edge of the CBD providing for higher density housing choice and new knowledge-based industries"

The draft GARP promotes strategic infill for mixed use including housing in the Stepney Triangle, the area bounded by Magill Road, Payneham Road and Nelson Street. The Stepney Triangle is currently zoned Employment in the Planning and Design Code and has been identified by the NPSP Council as a food and beverage manufacturing precinct. This area should remain as such as it provides a needed 'Near City' location for small manufacturing and office & warehouse activities. It is also within a few hundred metres of Lot 14 and could provide locations for complementary activities.

We note that the Burnside - Sportsmed Hospital has been located in Stepney for many years.

An Employment zoned area close the city is a major asset given the loss to residential infilling and population growth. Such an area has been lost with the redevelopment of the former West End Brewery site.

4. Expansion of the Affordable Housing Overlay to include Historic Areas and Character Areas

The Affordable Housing Overlay of the Planning and Design Code is proposed to be expanded to apply to all 'residential' zones (as foreshadowed in the State Government's Housing Roadmap) including those which are in existing Historic Areas or Character Areas. While the provisions of the Historic Area / Character Area Overlays in the Planning and Design Code will still apply, the Affordable Housing Overlay offers incentives such as increased density and height, and in relation to car parking rates that will be a threat to the amenity of our historic zones.

5. Traffic congestion:

As multi-storey residential towers increasingly line our main roads, these roads will become more congested with slower travel times to the city centre and across suburbs, especially at peak periods. In Australia, housing infill has always brought more traffic congestion. While walking, cycling and electric scooter use can be encouraged, and may increase marginally, it is a wishful thinking to assume that motor vehicle usage will decline. Not many old people will get on bicycles. Young mothers need cars to get groceries home and to carry toddlers around.

Traffic congestion is one obvious example of what happens when infill housing overloads existing infrastructure capacity and road capacity.

6. Infrastructure costs: The GARP Discussion paper (page 16) notes that

"The Commission is working with Infrastructure SA to identify cost differences between infill and greenfield development. The work of ISA and other infrastructure agencies around Australia shows land development costs in urban and township expansion areas can be significantly higher than land development costs in established residential areas".

However, a recent article by economist Judith Sloan puts an opposing view:

"It is a statement of faith by many town planners, and more recently state government, that undesirable 'urban sprawl' involving new estates of detached housing must be discouraged. We are told, incorrectly, that the cost of providing infrastructure to these new areas is prohibitive...In fact, previous work by the real Productivity Commission shows the unit costs of infrastructure for new housing are much less than those of upgrading infrastructure in occupied suburbs. It can't be

assumed there are swathes of under-utilised infrastructure – think here schools, shops, medical facilities, water and sewerage, local roads – in these middle suburbs” (“Housing plans count for nothing without talk of migration”, *The Australian* 16/10/2024, page 11).

7. The four aspirations in GARP are: -

- (i) A greener, wilder and climate-resilient environment
- (ii) A more equitable and socially cohesive place
- (iii) A strong economy built on a smarter cleaner regenerative future
- (iv) A greater choice of housing in the right places

The first aspiration, (greener, wilder) is certainly a worthy one. However, we are concerned that the proposed densification of suburbs such as Payneham will result in a net loss of trees as houses and gardens are removed for more dense dwellings. Putting multi-storey housing on main roads will require councils to plant more street trees near these towers to try to lessen their visual impact on the streetscape and to add some cooling greenery to localities. Councils will need to be encouraged to do this.

Developers in Adelaide have been generally reluctant to plant multi-storey residential towers with hanging gardens and other landscaping such as rooftop gardens, although it can be done. We submit that the Planning and Design Code should include requirements for visually attractive, softening and cooling landscaping to be planted and maintained on residential towers if the Commission is serious about wanting a “greener, wilder and climate-resilient environment”.

We note that the other Code Amendment out for public consultation, the Future Living Co-Housing Code Amendment, is proposing an “aging in place” strategy whereby back-gardens can be used for new housing plus a shared garden space. This may result in a significant loss of trees and understorey vegetation as council planning authorities will be powerless to stop the clear-felling of most trees and gardens before development applications are lodged. The so-called “Missing Middle” housing strategy appears to fly in the face of the “greener, wilder” aspiration.

The second aspiration, (a more equitable and socially cohesive place), is too a worthy aim. However, it is not clear that packing people into multi-storey housing on main roads in existing suburbs will be conducive to achieving this goal. We may see greater social

divisions in society as a result of new densification policies and continuous population growth. Long-term studies on this should be supported by the Commission.

The third aspiration (a strong economy etc.) is worthwhile, but a set of housing policies may not be capable of delivering this. While the building industry is a major part of our economy, thanks to our relatively high immigration intakes over many years, it is clearly not sustainable to keep building more and more housing for an ever-expanding population. Let's hope world population stabilises at under 10 billion in the next 30 years.

The fourth aspiration (a greater choice of housing in the right places) appears sensible, but there are winners and losers in housing policy changes, as some citizens may be negatively affected by the GARP proposals, while others may benefit. A more honest recognition of this in State planning policies would be welcome. While some central planners may consider our back gardens "the right places" for new dwellings, others may consider these back gardens are indeed the wrong places for new housing.

8. Public Consultation.

We consider that providing a bare six weeks for public consultation on the 300-500 page GARP online document plus accompanying documents is inadequate. This period is not long enough for a democratic and fair consultation process. Indeed, it strikes us as a rushed process. Our Association has barely had time to study the online documents, let alone to communicate with residents who may be most negatively impacted by the GARP provisions. We submit that the public consultation process for the GARP is not consistent with the spirit of the Charter of Citizens Rights which was part of the new planning system when the Planning and Design Code was introduced.

We thank you for the opportunity to provide comments on the draft Greater Adelaide Regional Plan.

Yours faithfully,

David Cree
President