



ST PETERS RESIDENTS ASSOCIATION INC.

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The Chief Executive Officer,
Norwood Payneham and St. Peters Council
PO Box 204
KENT TOWN 5071

Dear Sir,

Re: Residential Development (Zones and Policy Areas) Development Plan Amendment

Our Association appreciates being able to comment on the Draft Plan.

RESIDENTIAL CHARACTER ZONE

Our Association welcomes the introduction of this new Zone and hopes that it protects the historic character of the Zone while allowing some new sensitive residential development. We have been concerned in recent years to see unsympathetic 2-storey McMansions springing up in streets with a hitherto historic and coherent character. Similarly we have been concerned to see huge 2-storey rear additions to dwellings which have had major impacts on neighbours in terms of visual intrusion and overshadowing due to excessive bulk and scale and high site coverage. The character of an area is defined not just by what can be seen from the street, but also by what neighbours have to view in their rear gardens.

We point out that large rear 2-storey additions to, or parts of dwellings, on corner allotments in character areas often present an unfortunate and incongruous aspect to the historic streetscape. We submit that more stringent criteria for corner allotment 2-storey additions or parts of dwellings should apply so that the bulk, height and scale of these additions or rear parts are minimized to help protect the desired character streetscape when viewed from the side-street. This should also be considered for Council's Residential Historic (Conservation) Zones.

We welcome a replacement provision PDC 17 in the Residential Historic (Conservation) Zone which requires that new additions to buildings "*should not result in an excessive mass or scale that would adversely affect the visual outlook from adjoining residential properties*". (*Amendment Instructions Table*) We submit that this wording should be used in the proposed PDC 12 of the Residential Character Zone as it is stronger than the wording proposed to be used in PDC 12.

Objective 5 of the Zone is "*Development that maintains existing residential densities*". We welcome this Objective. However both the Maylands and St. Morris Traditional Character Policy Areas allow hammerhead and battle-axe land divisions which result in new dwellings being constructed on former private garden areas. As such developments clearly increase density, we question how hammerhead and battle-axe type redevelopments are consistent with Objective 5 of this Zone.

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We submit that hammerhead and battle-axe developments are inconsistent with the traditional character and historic layout of allotments and dwellings in the areas the Residential Character Zone seeks to protect and should not be permitted. Rear gardens traditionally used for raising children, growing fruit trees, vegetables and native trees and shrubs which provide valuable habitat for urban wildlife, keeping hens, backyard barbeques and a host of hobbies and recreational pursuits are an important feature of the traditional character of these areas and should be protected from infill development which undermines these activities. Many of the hammerhead developments already in the Maylands area graphically illustrate why no more should be allowed.

If hammerhead, battleaxe and other historically inappropriate subdivisions are to be allowed in these two Policy Areas of the Residential Character Zone, we submit that a provision in the St. Morris Traditional Character Policy Area *Desired Character Statement*, which allows such developments “provided that the driveway handle is well landscaped”, should also be included in the Maylands Traditional Character Policy Area. We further submit that the wording of this clause should include the words “and preferably curved”. The handle of a hammerhead/battle-axe development often presents to the street as a bleak gun-barrel-type driveway. Having this handle well-landscaped and with a softening curve generally presents a more attractive aspect when viewed from the main street frontage. This has been done well by Housing SA in its 1990s housing complex in Janet Street Maylands.

Athelney Avenue/Botanic Street Traditional Character Policy Area 13.1

The proposed minimum site area for this Policy Area is 400 m². However Hackney Road contains several large attractive bungalows on generous sites, often with many trees and much vegetation. We submit that the minimum site area of 400m² will result in the carving up of these sites together with the loss of historic bungalows and the leafy character of Hackney Road. We submit that the minimum site area on Hackney Road should be 600m² in this Policy Area to help protect the traditional historic character of Hackney Road.

Hackney Road is rich in history and heritage. This proposed Policy Area is adjacent to St Peters College, a Residential Historic(Conservation) Zone and the Local Heritage row dwellings at numbers 3-9 Hackney Road, with the State Heritage listed Romilly House nearby.

Trinity Gardens Traditional Character Policy Area 13.7

This area is not within the area governed by the former St. Peters Council and we usually confine our comments to the former St. Peters Council area. However we wish to comment on the proposed Policy Area as Trinity Gardens has been joined for several years with the Maylands/Stepney/Evandale area to form the Maylands/Trinity Ward.

We note that much of Trinity Gardens was built in the inter-war period with splendid houses and gardens. We submit that many of these properties are equal in value to those in the proposed St. Peters Traditional Character Policy Area 13.6.

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As the *Desired Character Statement* for the Trinity Gardens Policy Area points out, the eastern portion of the Policy Area around Hereford and Canterbury Avenues was built in the 1920s as a Model Garden suburb. This is a particularly beautiful and valuable area.

We submit that the minimum site area for the Trinity Gardens Policy Area 13.7 should be 600 m², as it is for the St. Peters Traditional Character Policy Area 13.6. At present the proposed minimum site area for this Policy Area is 550m². However as many sites in Trinity Gardens would be about 1100m² (the old ¼ acre), a minimum site area of 550m² will allow as a right the division of these allotments, and hence the destruction of much of Trinity Gardens. On the other hand, a minimum site area of 600m² would help protect the existing grand bungalows and their gardens from demolition and subdivision as a developer would need to argue why it should be permitted. This would strengthen the opportunity for the desired character of this area to be achieved.

RESIDENTIAL MIXED CHARACTER ZONE

The *Desired Character Statement* for the Residential Mixed Character Zone includes the statement that despite recent new residential development,

“...it is the underlying character which may ... be defined by remnant pockets of the original built form, or by dwellings set in spacious garden allotments, that is the valued element that this Zone aims to protect.”

The problem is that Council has not got the ability to achieve this aim when it is, at the same time, seeking to encourage the subdivision of allotments and infill housing development. The remnants of original housing and dwellings in spacious gardens will, over time, give way to infill housing. We submit that this is a major flaw which lies deep in the heart of the very concept of a Residential Mixed Character Zone.

We note that the Residential Mixed Character Zone allows for 1-4 storey dwellings where there is not a predominance of pre-1940s dwellings, according to the coloured map provided by Council to the public. However there is no mention of multi-storey dwellings in the *Desired Character Statement* or the general provisions for this Zone. We submit that this needs some clarification so that the public can better understand the Mixed Character Zone provisions.

Evandale/Marryatville Policy Area 14.1

We submit that Belinda Street Evandale and Wheaton Road which sits on the border between Stepney and Evandale are both characterized by well-maintained pre-1940s stone villas and cottages which exhibit a degree of coherence and traditional character equivalent to that of many streets included in the Residential Character Zone. We submit that both these streets should be excluded from the proposed Mixed Character Zone.

The western side of Belinda Street is proposed to be included in the Mixed Character Zone whereas the eastern side of Belinda Street appears to have been included in the Residential Character Zone. We cannot see the logic in this as the western side of Belinda Street has an even more traditional and consistent character than does the eastern side.

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Wheaton Road which sits on the border between Stepney and Evandale has substantial, predominantly pre-1940s villas set in spacious attractive gardens. It would be a great loss to these suburbs if the character and coherence of this streetscape were to be destroyed. This road should be incorporated into the Residential Character Zone, we submit.

The western side of Clinton Avenue Evandale is characterized by pre-1940s stone villas with a high degree of consistency, character and charm. We submit that this historical character warrants better protection than that proposed and that this western side of Clinton Avenue should be included in the Residential Character Zone.

It is proposed that 3-4 storey flats may be built on the Housing SA site at 53 Nelson Street Stepney. This site is adjacent to the Stepney Policy Area of the Historic (Conservation) Zone in Ann Street. Ann Street is a very narrow street lined with small cottages on generally small allotments. It experiences problems with parked vehicles blocking the 2-way flow of traffic. We submit that 3-4storey flats would negatively impact on the character and amenity of this part of the Stepney Policy Area of the Historic (Conservation) Zone. We submit that this site should be restricted to 2-storey flats.

On the north-western side of Payneham Road there is a line of beautiful stone villas built around the 1900s in Joslin. We are concerned that the provisions of the proposed Policy Area 14.1 will allow these historic villas and bungalows to be demolished to make way for 3-storey flats. We submit that this row of historic dwellings should be considered for a Mixed Use Historic (Conservation) Zone so that this part of our built history can be preserved. This will add to the attractiveness and tourism potential of Payneham Road. As well, the Joslin/Royston Park Policy Area of the Historic (Conservation) Zone is adjacent to this part of Payneham Road and we submit that 3-storey flats will impact negatively on the character and amenity of this part of this conservation Policy Area.

We point out that 2-4-storey apartments which may be built on the south eastern frontage of Payneham Road are not appropriate for most senior citizens who often have problems climbing stairs. Electricity failures do occur and lifts are not always in operation. At present there are many elderly people living in retirement cottages on this part of Payneham Road. We express our concern that 2-4-storey dwellings will deprive our older residents of opportunities to live in this area. This will decrease housing choice and the diversity of our population.

We submit that housing densification along our main roads requires space left for trees and other vegetation to grow. Trees and other vegetation absorb air pollutants and help dampen traffic noise. Both Australian and international research has shown that there are increased health risks for residents living on major roads. These health risks include a greater frequency of premature and underweight babies in pregnant women, worse asthma in adults and children, higher rates of cardiovascular disease and higher rates of childhood cancer (1). It is unfortunate that the State government's 30 Year Plan for Greater Adelaide ignores the health impacts of housing people on major transit corridors. However councils can help ameliorate these impacts by ensuring that multi-storey residential sites on major roads and/or adjacent public lands have generous landscaping.

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We find it disappointing this draft Policy Area is silent on the issues of air pollution, people's health and the need for trees and vegetation to ameliorate the negative health impacts of heavy traffic flows. In contrast, "gross densities" of housing with a frontage to Payneham Road are worthy of a Principle of Development Control (PDC 10). Are gross densities of housing more important than people's health? We have no doubt that State government planning bureaucrats are to blame for this cavalier attitude to residents' health rather than local Councils. We submit that there should be a Principle of Development Control included in all Policy Areas which propose to house people in multi-storey flats on main roads which addresses the need for high quality and generous amounts of trees and other vegetation, whether on public or private land, to help address people's health needs in what is essentially an often noisy and polluted environment. Perhaps developers should be required to pay a special levy to help upgrade public land and vegetated areas next to their multi-storey apartments, rather than have all ratepayers subsidise the profits of these developers by paying for these upgrades through their Council rates. Additionally, the Principles of Development Control should include a requirement for the acoustic treatment of the doors and windows of multi-storey dwellings facing main roads.

Hackney Policy Area 14.2

Objective 1 of this Policy Area states "*A Policy Area that maintains a mixed low to medium density residential character*". We note that since Council has no power to control demolitions (except for Local Heritage Places in this area), Council has virtually no power to maintain the low density residential character which forms part of this Policy Area. This concerns us particularly when we read the proposed Principle of Development Control 14 for this Area which states that

"Land division should create allotments that vary in size to encourage housing diversity...."

This Principle then goes on to specify 150 m² minimum site areas for the former Sanitarium site or 200 m² for all other sites. However, there are several beautiful Grand Mansions with wonderful gardens on Hackney Road included in this proposed Policy Area. This Principle of Development Control ensures their obliteration.

In the Hackney Policy Area *Desired Character Statement* it is stated that

"... Villas, Bungalows and Grand Mansions located along Hackney Road will continue to be the key reference point for new development".

Hackney Road has 12 State and Local Heritage Places listed, with 7 of them in this area. These are Nos. 57 ('Parkview'), 61, 63 ('Vailima'), 69 ('Mocatta House'), 79 ('Park Lodge'), No. 85 ('Edgerly') and 95 (Hackney Hotel). It is important that the well-landscaped garden settings of these heritage mansions are protected, as these garden settings form an essential part of the heritage and historical value of this area.

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Apart from the heritage-listed buildings these bungalows and mansions can be neglected, bulldozed and their sites largely covered in 200m² flats under the Policy Area provisions. We submit that this is a retrograde step which will rob Hackney Road and its surrounds of much of its historic character. Residential infill development of the Sanitarium site will spearhead the attack on the Grand Mansions and Grand Gardens of Hackney Road.

The proposed *Desired Character Statement* mentions the street trees in this Policy Area but is silent about the larger beautiful trees and leafy surrounds of most Grand Mansions on Hackney Road. We submit that these should be included in this Statement.

We submit that the minimum site area for dwellings on Hackney Road in this Policy Area, with the exception of the Sanitarium site, should be 600m² to help protect the integrity of this historic part of Hackney Road. We also submit that hammerhead, battleaxe or similar configuration land divisions should not be allowed on Hackney Road in order that the substantial landscaped gardens, which provide the setting for the major mansions along this road, should be preserved.

Sanitarium Site

We understand that St. Peters College has expressed interest in this site and we hope that Council can encourage the College to incorporate the site into the school.

We oppose 3-storey apartments being allowed to be built on this site. Residents are concerned by the potential for overlooking and overshadowing as well as the intrusion of 3-storey apartments into this locality. The Sanitarium site is next to the Hackney North Policy Area of the Residential Historic (Conservation) Zone. Three-storey apartments may impact negatively on the character and amenity of this conservation area. There is also the potential for this proposal to exacerbate the existing traffic congestion and parking problems in the narrow streets adjoining and near to this site. We submit that single and 2-storey dwellings would be more in keeping with the existing character of this historic part of Hackney, as well as reducing the potential for overlooking and overshadowing problems.

New development on this site should be designed by qualified architects and should incorporate generous landscaping and trees to integrate it with the historic mansions and extensive gardens surrounding them on Hackney Road. We hope that some of the existing beautiful large trees on this site can be retained in any new development. The landscaped frontage to Hackney Road should be protected by a Principle of Development Control requiring any development to be setback at least to the same extent as the adjoining number 69 and the next property to the south at 67 Hackney Road.

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Two pieces of land on North Terrace, College Park

It is not clear from the proposed *Desired Character Statement* for the Hackney Policy Area whether or not 3-storey residential development will be allowed on the two pockets of land on North Terrace which are included in this Policy Area. This should be clarified in this Statement. We submit that the medium-density site at 99-105 North Tce, commonly referred to as “the Hickinbotham site” (after its developer) should be kept as a 1-2 storey site as it adjoins the College Park Policy Area of the Historic (Conservation) Zone and 3-storey housing creates an unacceptable potential for negative impacts on existing residents in the adjoining historic Policy Area.

The row of dwellings west of Trinity Street up to St. Peters College presents as relatively humble pre-1940s single-storey cottages. With their intact historic character, we submit that they should be omitted from the Residential Mixed Character Zone and placed in the Residential Character Zone. It is sad to think of all the history being stripped from our main roads. Tourists enjoy seeing rows of historic character-laden housing, as do residents. They add interest and a human-scale to our main roads. This row of housing is probably affordable housing for students, workers and pensioners. We hope that Council would not encourage it to be destroyed. We submit that at the very least, this residential part of North Terrace should be limited to single-storey development as this land abuts the College Park Policy Area of the Historic (Conservation) Zone.

RESIDENTIAL ZONE

We understand that the Residential Zone is to experience the most dramatic re-shaping of its housing stock under the proposed re-zoning. We submit that Council should have written to the residents who live in these areas to advise them of the proposed changes and the public consultation process. We are aware of considerable community concern in the Policy Area 15.7 close to the River Torrens in St. Peters and Joslin. We have also been contacted by many residents of the former Payneham Council area who were bewildered by the proposed changes as they knew nothing about the rezoning until late in the consultation process. They were concerned that their post-war detached houses were to be swept away by multi-storey blocks of flats over the next 10-20 years.

We submit that replacing detached houses and gardens by multi-storey flats is a fundamentally flawed and regressive policy which ignores the aspirations of the majority of residents. It is simply untrue to claim that existing under-used infrastructure can accommodate the increased population and building density proposed. Virtually all existing infrastructure and services will come under strain as housing density increases. Electricity supplies, stormwater disposal systems, water and sewerage and roadways – the list goes on, will need upgrading due to extra stresses from infill housing. Multi-storey flats can bring their own set of social problems. The State government is responsible for forcing this politically charged and unpopular policy on to local councils, whereas it should be examining less damaging options for accommodating more people such as decentralization, as the Western Australian government is now doing.

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We submit that there should be Category 3 public notification of multi-storey flat dwellings in the Residential Zone. The proposed radical re-shaping of the housing in this Zone necessitates a greater degree of public involvement in the development process than has been the case in recent years. We submit that this would better engage local residents and the general public and would probably result in improved developments after public and neighbours' concerns were taken into account.

Adelaide Caravan Park Policy Area 15.1

We oppose allowing 6-storey flats to be built on this site. We submit that this would create an unacceptable and out of character bulk, height and scale of solid structures in this locality, an unacceptable and out of character degree of overshadowing, the potential for over-looking of nearby neighbours and/or the perception of being overlooked by such neighbours.

There are nine historic dwellings listed as Local Heritage Places at 25, 27, 31, 33, 35, 37, 39, 55 and 57 on the southern side of Richmond Street opposite the Caravan Park. Any new residential development on the northern side of this street must be sensitive to these heritage places.

The former Wesleyan/Methodist/Uniting Church at 36 Richmond Street on the Caravan Park site is a Local Heritage Place, as is the beautiful old building at No. 46, the former Park Barn. Any new development on this site must also be respectful of these original historic places.

We submit that any multi-storey residential redevelopment of the Caravan Park site should incorporate a generous amount of landscaping and trees, preferably native, to shade, screen and soften the development when viewed from the street and to complement the Linear Park and riverine environment.

The River Torrens cliffs bordering the Caravan Park on its northern side appear very steep. We question whether enough attention has been paid to the long-term stability of these river banks and the desirability of building dense multi-story structures adjacent to them. In their natural state, cliffs and river banks erode, move and change their shape over time. Erosion of cliffs, encroachment of property owners on to the cliffs and river bank collapses are existing long-term problems in this area, even with the existing low-density development along the River's borders.

At around the time the Linear Park was created many property owners bordering the river held title up to the middle of the River Torrens. These owners then ceded to the State government the ownership of their parts of the River, with the exception, we understand, of the owners of the Caravan Park. The lack of a pathway behind the Caravan Park to access the Linear Park forces pedestrians and cyclists on to Richmond Street which is generally inconvenient and always dangerous. We welcome Council's intention to have a pedestrian and bicycle pathway established along the Linear Park to the north of the Caravan Park site, as outlined in the *Desired Character Statement*.

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Richmond Street is a major thoroughfare for non-local through-traffic. At peak travel times, Richmond Street's capacity to cope with heavy traffic flows is already over-stretched due to the "rat-run" of through traffic from/to Richmond Street, Harrow Road, Eighth Avenue and on to Stephen Terrace and Payneham Road. This will lead to increased pressure to install traffic lights at the Richmond Street/Hackney Road intersection, which will further increase the traffic burden in this area by encouraging more through traffic looking for an easier path

There is a serious and dangerous congestion problem in this street at peak traffic times. Six-storey flats will exacerbate this problem with a significant number of extra vehicles exiting and entering the Caravan Park site. It is likely that most of the people who live in any future multi-storey apartments on this site will drive motor vehicles. A less intensive re-development, while adding to the traffic burden, will lessen this exacerbation.

We submit that the Caravan Park site would be better suited to 3-4 storey apartments rather than 6-storeys. This would create less of a gross intrusion into the existing character of this area which is rich in local history and heritage, with a lower potential for unacceptable overshadowing, overlooking and traffic problems.

A further concern is that the proposed zone mandates a minimum building height of 2 stories on the Richmond Street frontage. We feel that this should be, or at least provide the opportunity for, single storey development, as this is the interface to the single-storey heritage dwellings directly opposite, on this very narrow street.

We express our deep concern that the State government will ask Council to allow multi-storey apartments higher than 6-storey on the Caravan Park site, or worse, unilaterally impose a greater height, as it has already done on the former Channel 7 Gilberton land on the opposite bank of the river.

We close our comments on this site by pointing out that the Adelaide Caravan Park has provided modest affordable accommodation to many people for many years. By rezoning this site, Council is facilitating the replacement of such accommodation by less affordable housing. The Adelaide Caravan Park is a much-used tourist facility, and is unique in its location relative to the CBD, not only in Adelaide but in Australia.

River Torrens Linear Park Medium Density Policy Area 15.7

We are strongly opposed to the transformation of these highly sought after residential areas into medium density ones. No justification has been provided for this decision, apart from their proximity to the River Torrens and the Linear Park. It is high-handed arrogance to dictate to people that in their streets -

"These areas, which are generally characterised by low density single storey detached dwellings on generous size allotments, will experience a transformation in built form and density to reflect their locational advantage in terms of access to this significant open space corridor"

(Desired Character Statement)

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Residents who are horrified by this attack on good quality neighbourhoods have contacted us. People bought into these areas for their quiet, safe, leafy environments, large gardens and low-density housing, perfect places to raise families. These are premium areas in St. Peters, Joslin and Royston Park. People paid high prices to buy into these areas and many of them do not want their streets radically transformed by dense 4-storey apartments springing up. Their views must be seriously considered.

This policy area in St. Peters is far removed from shops and public transport. So it is not suitable for people, let alone senior citizens, to walk to shops or buses. While this Policy Area is close to the Linear Park, this public space cannot be used for a range of activities for which people use private open space. Parents will not let their young children play unsupervised in the Linear Park. Children who live in the proposed 4-storey flats will be playing on concrete at the base of these apartments or left in front of the TV set or computer game and undoubtedly will grow fatter and more alienated. People cannot garden in the Linear Park as they can in their own private open space. The list goes on. The assumption by government bureaucrats that dense housing can be crammed along the Linear Park because it provides open space shows how out of touch they are. Public open space is not private open space and it cannot compensate for the lack of the latter. Other countries have experienced serious social problems when people have been crammed together in dense multi-storey flats and deprived of adequate private open space in which to recreate. Our State government bureaucrats seem determined that we should follow this course.

Two to four storey housing is not suitable for most senior citizens who often have difficulty negotiating stairs. Even if the 4-storey apartment complex has a lift, there will always be some electricity failures and no-one wants to see elderly people languishing on stairwells. This type of housing will drive senior residents out of these localities and reduce both their housing choice and demographic diversity in these areas.

There is no justification for removing good quality character residential areas, much treasured by local residents, from the existing R1 Zone to place them in a Medium Density Policy Area. To do so is a major downgrading of their residential amenity and quality of life. As such it amounts to a travesty of justice and flies in the face of good planning principles. All of the 15.7 Policy Area south-west of Lower Portrush Road is currently zoned Residential 1 and the Objective of this zone states

“A zone primarily accommodating detached dwellings at low densities on individual allotments”

The first Principle of Development Control reinforces this. In the St Peters part of the Zone a detached dwelling is the only complying form of development, and in the Payneham part it also has a recreation area as complying. Non-complying development includes Multiple Dwellings, Residential Flats, Row Dwellings, & Semi-detached Dwellings.

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The proposed 15.7 Policy Area provisions are therefore a major change in the zoning for this part of the City, where there has already been considerable redevelopment in line with the existing R1 low density zoning. This is causing considerable concern for the residents, as it has the potential to change their expectations of how their locality will evolve.

The dwelling height proposed is for 2 to 4 storey. The minimum height is mandated as 2 storey and will not offer the opportunity for the erection of a single storey dwelling, which may better suit the preferences of the elderly or infirm, hence limiting the demographic diversity sought.

We submit that the Policy 15.7 areas in St. Peters, Joslin and Royston Park which already about the Residential Character Zone should be removed from the River Torrens Linear Park Medium Density Policy Area 15.7 and placed where they belong, in the Residential Character Zone.

Finally we submit that the former Transport S.A. carpark off Holton Court should not be included in the 15.7 Policy Area. We submit that this land should be re-zoned to form part of the Linear Park (River Torrens) Zone to facilitate its incorporation into the Linear Park from which it should never have been excised.

Thank you for receiving these comments. We would like to send a representative to speak to Council at the public meeting on 5th of March next to outline our views.

Yours faithfully,

Evonne Moore (spokeswoman)

31st January 2013

References:

- (1) U.S. Health Effects Institute report *Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure and Health Effects*. Executive Summary. 2010;
- (2) San Diego Earth Times *Key Studies on Air Pollution and Health Effects Near High Traffic Areas* 2011; The Advertiser 5/4/11 p. 24 *Highways linked to baby risk*.