



SUBMISSION ON THE DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

Drafted on behalf of the Norwood Residents Association Inc.

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Mr Tim Anderson QC

Chair, State Planning Commission

By Email: DPTI.PlanningEngagement@sa.gov.au

SUBMISSION ON THE DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

Dear Mr Anderson,

I am writing on behalf of the Norwood Residents Association (the 'NRA'). We are an association that consists of home owners and tenants in the electorate of Dunstan. I refer to the draft State Planning Policies for South Australia (the 'Policy'). We thank you for the opportunity to respond to a document with such importance and gravity for all South Australians.

In part, this submission is to endorse the concerns about the proposed Policy outlined in great depth by the city of Norwood, Payneham and St Peters (NPSP). Please find attached a copy of the submission from NPSP to which I will refer, marked "Attachment A". However, apart from the numerous practical and immediate concerns discussed in the Council's submission we, as an association, have many local concerns that I shall outline for your consideration.

It should first be noted that we believe the foundation for this Policy is flawed in its assumptions and positions. At the heart of the Policy is a draconian abrogation of basic democratic rights of citizens and residents that is emblematic of the reason the previous government was voted out of power. This proposed Policy very obviously weaves a veil that obscures the commerce between government bureaucrats and commercial developers from the public view. This fundamental principle is perhaps best expressed in the aphorism, "democracy dies in darkness". The Policy uses the consultation process to remove individual rights and remove local autonomy. In exchange, the Policy offers a streamlined process for unfettered property development.

The Nature and Purpose of the Policy

We appreciate that the Policy is designed to be a high level document that is intended to codify the strategic intent of planning in South Australia. We also appreciate that as South Australia grows we need to encourage growth in each of our suburbs to sustainably accommodate for an increase in population. However, the lack of specific detail, the omission of regional level planning and the inconsistencies in the Policy with the 30 Year Plan, causes significant uncertainty about how these policies will be applied. There is no stated hierarchy of policies and no mention of how conflicts between the various policies will be resolved and addressed at the development assessment level. For instance, the Policy calls for increased density in the metropolitan area of Adelaide to provide affordable, medium to high density, mixed use dwellings. The Policy also prioritises an increased green canopy in the same area. It is unclear how the Policy intends to weigh the priorities of constructing a six storey apartment building or retaining treescapes. Recent history would lead us to believe that corporate interests will prevail in the absence of clear policy.

This Policy has been proposed in isolation of specifics. We appreciate that the intention of the document is to embrace public consultation at a high level in order to streamline the planning process at the micro level. The people of South Australia are being asked to weigh in on an abstract without a line of sight on what the Planning and Design Code will entail. This approach to policy requires an

inherent level of trust in the process from the constituents of South Australia. The consultation period for this draft policy originally opened with around a fortnight for written submissions and a single CBD site for information sessions held between 9am to 5pm Monday to Friday. By taking this approach to consultation you ostracised residents who are employed (about 850,000 people in South Australia as of August 2018¹) as well as anybody who lives outside the greater Adelaide metropolitan area. The original consultation period and process was well short of your own charter and was perceived as disingenuous at best. To the Department's credit the consultation period was extended and representatives made themselves available to concerned residents groups on request. We are still surprised that a larger public information campaign has not been undertaken given that the proposition is to remove rights to consultation on individual developments – we suspect that this would cause alarm to the residents of South Australia if they were made aware of this policy document.

In December of 2017 the City of Adelaide and the SA State Government co-published the results of their market research on what type of housing people in Adelaide want and what trade off they would take for their ideal lifestyle. Please find attached a copy of this publication marked "Attachment B" for your convenience. When asked about trade-offs, 32% of respondents reacted favourably to having one car park but having access to good public transport; 29% reacted favourably to having an apartment where you could walk to work; however, 64% reacted favourably to having a house with two carparks; and 58% reacted favourably to having a larger block within a 30 minute drive to work. These ratios are consistent across the sample including the two most pro-apartment subcategories, 'Cosmopolitans' and 'Urbanites'. According to the State's own market research there is a clear lean towards the valuation of lower density housing. You are not listening to your people but you are demanding their trust.

Recent decisions to make Major Development Declarations that override council regulations – and in instances the policies proposed in this Policy – add to the uncertainty in how our neighbourhoods will be shaped. There are numerous examples within a stone's throw of the Norwood Town hall that fundamentally alter the nature of the area. While we would argue that these developments demonstrably devalue a sense of culture and belonging in our area we would like to stress that this is far from a 'not in my backyard' concern. This approach is prolific in Adelaide with an enormous number of apartments currently under construction. The dramatic increase in new apartment construction has been justified as meeting the housing needs for an increasing population. The Policy predicts an increase of close to 90,000 people every five years through to 2036. The Australian Bureau of Statistics has reported the population growth for South Australia as a whole is less than two thirds of DPTI's predictions. The Policy paves the way for developments that are neither needed nor desired by the general public. The view that everyone has the right to live in any suburb in South Australia and that this could be achieved by developing town houses and apartments, was recently expressed by a member of the State Planning Commission on talkback radio. This viewpoint is devoid of common sense and economic rationale. There is no indication on how development planning will be balanced by the wishes of the people who reside in the affected area versus corporate interests and personal bias. Given the unprecedented level of apartments under construction or in planning, the vacancy rates² in the city centre and the clear intention of this Policy to facilitate development, we question if this Policy takes into account lessons from the sub-prime mortgage market collapse and the last Global Financial Crisis. There is nothing that the Department or the State Planning Commission has done in the past decade (by way of urban planning) that warrants the trust of the South Australian

¹ Australian Bureau of Statistics – Labour Force statistics

² The vacancy rate across Adelaide is reported at 1.2% but it is reported at 4% within Adelaide CBD, 5000. Taken from SMQ Research on 17 September 2018, <http://sqmresearch.com.au>

people.

Integrated Zoning

We agree with the sentiments expressed by NPSF that 'it is vital that urban growth occurs in areas where the necessary infrastructure and services can be provided or improved and to avoid ad-hoc, unstructured and scattered infill growth in areas which are inadequately serviced'. However, we respectfully submit that there is value in lower density areas that are still relatively close to the CBD. The Policy does not delineate zones that are currently low density and should remain that way to preserve heritage, historical structures, culture and lifestyle. For instance, Norwood is predominantly one or two storey residential dwellings with comparatively large allotments. We note that there are a handful of units in our suburb that are better examples of medium density properties. Commercial zones are largely restricted to the Parade and industrial sites are predominantly contained in the North-Western corner of the suburb. The Policy is unclear on the feasibility of three to six storey buildings being established throughout our suburb. The policy also bundles assumptions of living conditions pointing to maximum allotment sizes of 294m², which we suspect would surprise a number of residents in our district.

Adelaide is frequently marketed as a liveable city with lifestyle advantages. Part of the appeal of Adelaide is the historical integrity and cultural heritage that the city has. This is aptly demonstrated by NPSF being a member of the League of Historical Cities and the history based tourism economy that flows from this. Norwood, however, is not alone in the position that the integrity of our built heritage is at risk under the Policy. We are incredibly concerned with the Policy taking a 'one size fits all' approach to urban planning when the suburbs and precincts of South Australia present such individual character, heritage and history.

Housing Supply and Diversity

We agree that a diverse, accessible and co-ordinated housing supply is crucial for sustainable development in South Australia. We believe that focusing development in corridors and centres needs to be elaborated on and agreed to by stakeholders. We have seen 'corridors' being declared based on the assumptions around business activity and infrastructure support that do not materialise, but the corridor and developments remain as planned.

We agree with NPSF that seeking a 'permissive and enabling policy environment for housing within residential zones' is cause for concern. We share the view that this opens the door to inappropriate developments that conflict with public expectations, biodiversity and climate change policies. This ambiguity also raises concerns in relation to the protection and preservation of cultural heritage areas – the Policy, as it is currently worded, gives the impression that developments will be given a 'green light' over any protective restraints. We submit that rewording should be considered here to allow for the preservation of heritage and cultural zones and sites.

Cultural Heritage

We echo the sentiments of NPSF in that the Cultural Heritage policies lack content. We submit that there needs to be recognition and policy for the preservation and protection of built heritage – the Policy does not recognise the importance and fragility of our built heritage. If historical buildings are demolished in the name of progress then they are lost forever. We understand that the intention is to tackle this issue in a subsequent State Planning Policy. We respectfully submit that by not first addressing the issue of Cultural Heritage at a higher level you will dilute the impact of any subsequent policy. Furthermore, addressing this concern through subsequent policies does not address the hierarchy of policies in the event of inconsistencies, nor does it address concerns around transparency and trust in the process.

Conclusion

We are not disputing that the current planning policies may be flawed and need to be addressed, but we cannot support the Policy in its current form. The Policy appears to be completely at odds with current patterns of development, existing policy settings and is out of sync with community expectations. There is no reason why we cannot achieve sensible and considered infill development while paying tribute to our heritage and respecting the views of local stakeholders at all stages of development. We cannot, and will not, ever be in support of a policy that reinforces the inherent inequity of power between commercial gain and local residents.

Sincerely,



Christine Francis
President
Norwood Residents Association Incorporated



Tom Smith
Secretary
Norwood Residents Association Incorporated

CC The Premier, Mr Steven Marshall
 Deputy Premier, Ms Vickie Chapman
 Minister for Planning, Mr Stephan Knoll
 Minister for Environment & Water, Mr David Speirs
 City of Norwood, Payneham & St Peters
 Community Alliance South Australia
 National Trust of South Australia
 History Trust of South Australia
 South Australian Heritage Council
 Australian Civic Trust