

Thank you for this opportunity to present feedback with regard the current State Planning Act, Code and system.

My submission relates to:

1. Urban Corridor (main street) leaking, by design, into side streets – in particular I am referring to Norma Street Mile End and surrounding streets near Henley Beach Road.
2. The demolition of character homes which are not replaced – with reference to Henley Street Torrensville.

Residential side streets are inappropriate locations for the urban corridor zone. The zone should end with the rear of properties facing main streets such as Henley Beach Road and include a buffer for homes at the rear in the form of setbacks and landscaping. An example is 6 Ebor Avenue, which is located on the corner of Norma Street (a narrow street - parallel to Henley Beach Road) and Ebor Avenue. Norma street's northern side is Urban Corridor, while the southern side is an established neighbourhood character area.

Urban corridors (main street in this instance) are intended to increase density within (mostly) inner suburbs. Part of the rationale is the proximity to public transport. However, the appeal of public transport only works for those who work in the city and use public transport on *weekdays* during working hours. The transport is not as useful for late nights and weekends; therefore, most people are still likely to own a car and therefore need room for their cars and for that of visitors.

Residents of Norma street and Ebor Avenue have been distressed (3 families sold as a consequence) as we watched the back and forth calculating way the development application for 6 Ebor Avenue, has gone from SCAP to CAP to SCAP and back to SCAP (with variations) again. It seems the true nature of the development was not disclosed in an honest manner and was manipulated until the developer got what they really wanted – which was a 5 storey 25 apartment, two level carpark and bar or café. This, despite 4 storeys being the maximum for this address. Moreover, we understood that urban corridor promoted medium density development – yet this is high density.



Figure 1: 'Gentleman's bungalow'- 6 Ebor Avenue Eastern side. It can be argued that this property has already contributed to urban infill. It has been divided into flats, and the backyard (previously a tennis court with beautiful trees and shrubs) is now two well maintained and privately owned maisonnettes.



Figure 2: Norma Street (southern), side of 6 Ebor Avenue. The driveway to the two-level carpark will be in a similar position to the current driveway. The maisonette to the west of the building will face a 5-storey building of 17.97 metres right to its boundary. This is a narrow street, and delivery trucks for the nearby supermarket are CONSTANTLY damaging the curb and roundabout. A tree was destroyed by a truck where the yellow van is in this image.

According to the requirements of the code, Ebor Avenue (figures, 1-3) is the front of the building while Norma Street is the rear of the building and is treated accordingly according to the code, i.e. this is where waste disposal trucks will enter the carpark, and there is little room allocated for landscaping, although it should be argued that Norma Street should be more carefully considered, given that the southern side of Norma Street is established neighbourhood zone with character overlay. Noisy rubbish removal trucks will result in more noise and traffic in a street which already has its share of delivery trucks for the nearby supermarket.

Both Ebor and Norma have highly restricted parking, with limits of 1-2 hours or no parking during office hours. Parking restrictions are strongly enforced.

Currently 6 Ebor Avenue is large bungalow divided into 4 or 5 units (fig 1). The rear yard was divided into maisonnettes in about 1986 (fig 2). This property has already contributed to urban infill and increasing density. Last week, variations to this monolithic structure, (fig 3) which projects straight up from its block, were approved. The image in Figure 3 is deceiving regarding the width of the road. While this design has some merit, it is too big for this space.



Figure 3: Illustration of proposed 25-unit apartment building for 6 Ebor Ave., which since this illustration was generated, has increased in height from 4 to 5 storeys and a basement carpark – in effect now 6 levels. There are regulated trees on the northern boundary belonging to a neighbour – he is rightly concerned about the roots being damaged.

Issues of concern regarding urban corridors in a street such as Norma Street.

- While the need to increase urban density has merit, and the need to preserve biodiversity and agricultural land is crucial, urban corridors are an example of using a sledgehammer approach to fix a perceived problem.
- Developments such as 6 Ebor, are too big, too imposing, too dense, too tall, too bulky, and too incongruous with surrounding homes and the streetscape.
- Inconsistency within the code. The area is zoned for four storeys yet 5 storeys have been approved. Size creep, storey creep – precedents set – is this the future for developments such as these? If one development can go over height what is to stop future developments using 6 Ebor avenue's exception as an excuse for a new height?
- Two storeys or a maximum of three storeys would be more appropriate (see figures 8 and 9).
- Under consideration at 6 Ebor Ave are: 1 one-bedroom dwelling, 21 two-bedroom dwellings, 3 three-bedroom dwellings providing a total of 25 dwellings housing potentially 46 to 104 people.
- Ground floor comprises car parking, one single bedroom unit and a bar or café on the corner. Will there be a late-night licence at this venue? Keeping in mind this is NOT a main road or an urban corridor. In reality, it is a residential neighbourhood intersection – what problems between residents and the business will follow decisions made about this site? This is a terrible problem for people who have to *live* with decisions made by people who will never be personally affected by their choices.
- Provision for 36 car parking spaces. Carparking is a real issue in this area. We are close to shops and other businesses. Recently, while tradespeople were using our driveway, my daughter and I spent the week shifting our cars on the street every two hours. Every one of those 36 car spaces will be needed. There are questions around the accessibility of some of the spaces. Will the residents bother using them if they have to leave for work early?
- Does anyone actually come to inspect a site when decisions are made in the planning and design stage? There should be local knowledge applied to approvals.

- We have two units very close to our boundary and fairly close to our bedroom as a consequence of infill in a neighbour's property about 30 years ago. We don't object to this, nevertheless, in summer our neighbour leaves his air-conditioning on 24 hours a day, his outside light is often on, (and he used to sit outside and smoke – that came into our bedroom as well!) – this all impacts our bedroom at night. We have managed to block the light by planting a hedge, but we often are forced to sleep with our windows shut at night in summer because of the noise of the air-conditioning. He has also complained about the trees from our garden – which were there first - impacting his small courtyard. What recourse will we have if there are 25+ air conditioners making loud noise in summer?
- The approved development is *far too much of everything* for the 800 square meter block and is excessive.
- Regarding PO 1.3 *the 'ground floor [should contribute] to a safe, active and vibrant main street'* and comprise mixed use. Norma Street and Ebor Avenue are not main streets, and it is unlikely that residents wish their streets to be an active, vibrant main street.
- Norma Street has a range of wonderful early 20th century homes (see figures 4 – 7). It is reckless, wasteful and short-sighted to disregard their value. They reflect a range of housing styles from grand villas, and humble maisonettes with iron lacework and leadlight windows to 1970s two storey flats surrounded by gardens and ample car parking.
- Ironically, the larger homes with their large gardens are more at risk of demolition than smaller homes. This is a terrible loss to the character and history of Mile End and South Australia.
- It is disappointing to think that property owners are *encouraged* to destroy our heritage and history by planning authorities.
- A more nuanced and gradual approach to urban infill would be far more appropriate and more attractive for those who live in the new developments. i.e., less density, fewer storeys, much more room for landscaping and trees.
- Higher density development zones should be targeted– taking advantage of vacant land, underutilized blocks – there are plenty of examples of near vacant land on Henley Beach Road.
- City of West Torrens planners are of the view that eventually the northern side of Norma Street will be filled with apartment buildings. This is too much for one little street to bear. If all buildings fill their boundary the properties will be unpleasant to inhabit and there will be NO room for trees or sunlight. This is a case of planners telling people what's best for them and completely overriding our concerns and desires – our love for our community and our pride in our homes and gardens.
- Our gardens on the established neighbourhood side of Norma Street – the southern side – will suffer from too much shade, and the homes and gardens on the northern side – the Urban Corridor side will suffer even more.
- Developers are encouraged to design buildings that fill the entire block which contradicts the current concerns over South Australia's rapidly diminishing tree

canopy, in a time where there is going to be a parliamentary inquiry to examine how to protect and increase Adelaide's tree canopy, with a focus on urban infill developments. *This is the most objectionable component of urban corridors. Filling a block from boundary to boundary makes no sense whatsoever! It means there is no room for attractive, cooling landscaping and it reduces privacy for all occupants in the area.*

- Urban corridor criteria are antithetical to urgent concerns surrounding urban heating, loss of canopy, biodiversity and amenity. The benefits of green spaces and shade are well known.
- It is imperative that trees are retained, and more room is allocated to planting new trees and shrubs. Permeable soil is crucial to facilitate healthy soft landscaping and tree growth. Subsequent increases in biodiversity, the psychological benefits of tree and birdsong, cooler air, reduced air pollution, more carbon dioxide stored, cleaner stormwater, increased water filtration, flood prevention, lower energy costs, increased property value, more attractive streetscapes, improved privacy, more community connection, cooler streets and private spaces and improved thermal comfort (*Adelaide garden guide*, Green Adelaide, State Planning Commission SA, 2022)

Narrow residential side streets are inappropriate places for urban corridors. Urban corridor zones are *designed* to create high density living, eliminate effective landscaping and make no provision for tree canopies or protection of nearby trees.

They destroy private open space. Urban corridors need to be situated in proximity to public open space.

Urban corridors have been imposed on residents. Urban corridors in their current form, and if they are allowed to continue in this way (e.g if Norma Street becomes filled with 5 storey buildings on its northern side) will destroy the amenity and desirable qualities of our street and suburb like ours.

There must be a more creative, nuanced way to satisfy urban infill, one that incorporates gardens and creates havens for the inhabitants. One that creates beautiful places to live – more than just a dwelling, but homes – homes that are in harmony with the existing character and heritage of their locations.

Below I have included images from our street of homes that are at risk of being demolished and replaced by 5 storey blocks of flats. It is a pleasant, relatively quiet street with a range of homes including beautiful villas, character cottages and 70s flats surrounded by gardens. One of the wonderful things about living in Adelaide is that one can live in an inner suburb with a nice garden without being wealthy. People like us could never afford a home like this in Sydney or Melbourne. Nevertheless, being in an inner suburb, Norma Street has its share of busy traffic, including delivery trucks for the shopping centre nearby and rat run traffic during peak hours. At night the streets are full of parked cars east of Ebor Avenue, since the homes there have shared driveways and so on – there isn't room for anymore traffic or parking!



Figure 4: Norma Street Mile End - Urban Corridor zone- example of single fronted homes



Figure 5: Norma Street/Falcon Avenue Mile End – Urban Corridor Zone. Grand villa. It can be seen here that two storey townhouses next door to this home, are the same height as the single storey home and are not incongruous in this location.



Figure 6: Villa - Urban Corridor Zone Norma Street Mile End.



Figure 7: Villa Norma Street Mile End corridor zone



Figure 8: Desirable re-use of a former power substation, which is now housing. The height is not imposing.



Figure 9: Two storey infill (which replaced a rundown mid-century home) with permeable soil in the front garden, attractive building materials and front fence which compliment surrounding homes.



Figure 10: Henley Beach Road - Urban Corridor - This block has been vacant for at least 35 years, consequently this is a good site for development. However, the apartments are not selling. Sign has said 65% sold for several years. Meanwhile, the vacant land is filled with large weeds and rubbish. How strong is the desire for such properties?



Figure 10: 'Tribeca building' Rankine Road. Urban Corridor. The imposing nature of this building has led to several residents selling their homes – homes in which they had invested a good deal of money. No tree canopy. Nevertheless, this building comprises about 10 fewer apartments than Ebor Avenue and two less levels.

Issue 2: The demolition of character homes which are not replaced – with reference to Henley Street Torrensville.

I fully support the three prongs as outlined by the planning commission. What I find frustrating and concerning is that as a rate-payer of the city of West Torrens I am reliant on the administration, or my local councillors taking action. That is my understanding. I can only hope that my council takes these issues seriously and responds accordingly.

I have attached the images below because they are an appropriate example of why council should take advantage of the Planning Commissions suggestion in **Prong 3**. Four perfectly good houses were demolished several years ago and have not been replaced. Attached are images of three of the four the demolished homes in Henley Street, Torrensville and the consequent vacant land. The houses on the western side were demolished several years ago. I have also attached images of the weed-infested vacant blocks.

From the summary papers.

"State Planning Commission Proposal Noting the significant public interest in character and heritage matters, the State Planning Commission (the Commission) has been working on a reform package for the consideration of the Minister for Planning (the Minister). The Commission provided its proposed 'three (3) pronged' approach to character and heritage reform which includes:

Prong 1: Elevate Character Areas to Historic Areas Support and help councils to undertake Code Amendments to elevate existing Character Areas to Historic Areas.

This allows demolition controls across a broader area whilst maintaining the integrity of the Code.

Prong 2: Character Area Statement Updates Support and facilitate councils to review and update their Character Area Statements (and Historic Area Statements) to address gaps or deficiencies. This might include updating themes of importance, incorporating additional design elements, and including illustrations.

Prong 3: Tougher demolition controls in Character Areas This proposal is to introduce a development assessment pathway that only allows for demolition of a building in a Character Area (and Historic Area) once a replacement building has been approved.

This is to ensure that existing buildings in Character or Historic Areas are only demolished when the replacement building matches the character or historic value of the area."

I am sending this submission with support from my neighbours, Dina and Ian Savage, Prof Carol Johnson, Jean Duruz, Libby and Bill Cumpston and my husband, Kevin Baker.

I thank you for giving us this opportunity and hope that the consequences for the people who live with your decisions are taken into account.



Figures 11, 12 and 13 shows three of four perfectly good houses, which were demolished several years ago and were never replaced. Figures 14 and 15 shows the weed infested vacant land where the four houses stood.



Figure 12 – lovely character home destroyed in the past few years. In its place is vacant land overgrown with weeds (figure 15). This doesn't make any sense in a time of a housing shortage.



Figure 13 – demolished and not replaced.



Figure 14 vacant land on the western side of Henley Street Torrensville.



Figure 15 now vacant land on the eastern side of Henley street Torrensville. It's appalling that land can be left in this state for years. The weeds and whatever lives in them is likely to be a pest hazard.