

The Corporation of the Town of Walkerville

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30 January 2023

Mr John Stimson
Presiding Member
Planning System Implementation Review
GPO Box 1815
ADELAIDE SA 5001

Via email: DTI.PlanningReview@sa.gov.au

Dear John,

RE: TOWN OF WALKERVILLE SUBMISSION – PLANNING SYSTEM IMPLEMENTATION REVIEW

1.0 Introduction

The Town of Walkerville (the 'Council') welcomes the State Government's initiative to establish an Expert Panel to oversee the Planning System Implementation Review (the 'Planning System Review'). This review is timely given that the new Planning System has now been fully operational since March 2021. Accordingly, the Council is grateful for the opportunity to contribute to the Planning System Review and is pleased to provide the following comments and suggestions for the consideration of the Expert Panel.

Please note that this submission seeks to provide a summary of the views and opinions of the Elected Body of the Town of Walkerville. Accordingly, it has been informed by feedback provided by Elected Members during a briefing session held on 12 January 2023.

2.0 Character and Heritage

The Council notes with interest the Expert Panel's initial recommendations to the Minister for Planning in relation to the following proposed policy initiatives which are designed to boost the protection of valued buildings and streetscapes within designated Character Areas:

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

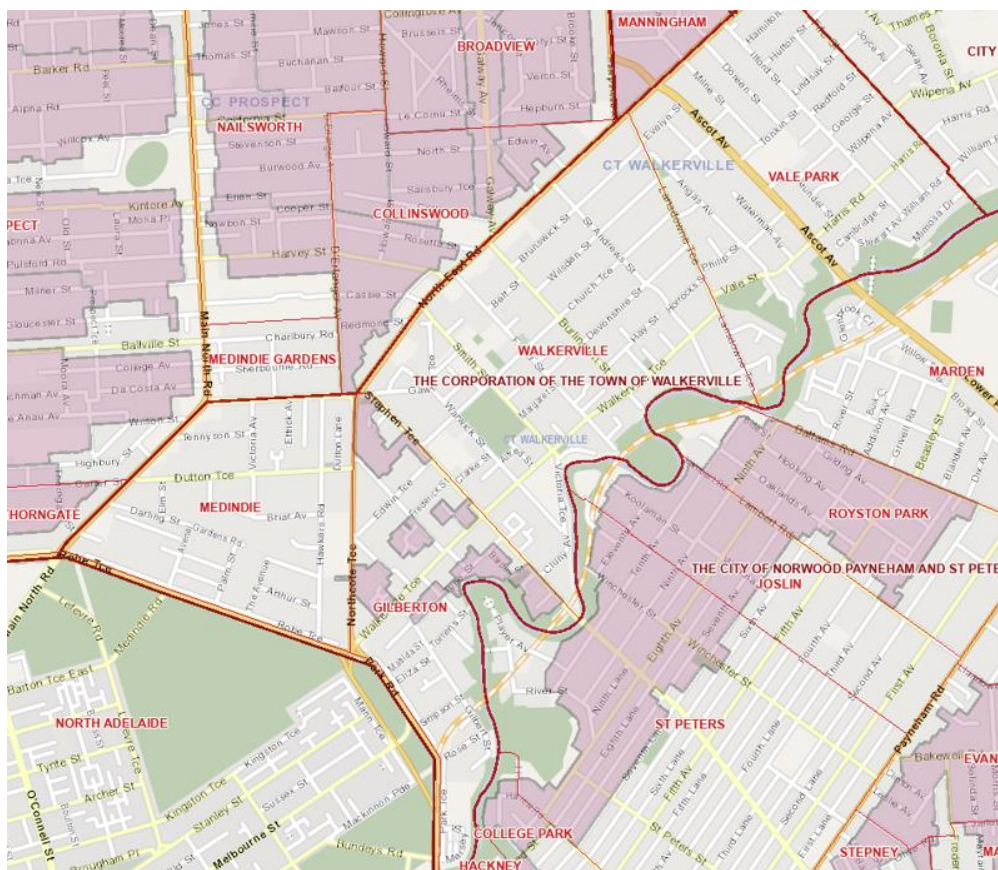
Support and facilitate councils to review and update their Character Area Statements (and Historic Area Statements) to address gaps or deficiencies. This might include updating themes of importance, incorporating additional design elements, and including illustrations.

The Council strongly supports any policy initiatives which will assist with the protection of valued historic buildings and streetscapes across its district. More specifically, a significant proportion of the Council sits within the Historic Area Overlay under the Planning and Design Code – particularly within the suburbs of Medindie, Gilberton and, to a lesser extent, Walkerville. The Council notes that, while the Historic Area Overlay provides a degree of protection, it represents a relatively ‘broad brush’ approach which lacks the policy nuance that is required to protect valued streetscape character while also encouraging complementary development outcomes.

In terms of Prong 1 (Elevate Character Areas to Historic Areas), the Council would be supportive of further investigations to determine whether the existing Character Areas within the suburb of Gilberton should be ‘elevated’ to Historic Areas. As noted in Figure 1 below, the suburb of Gilberton contains a number of relatively disconnected ‘patches’ of land which are subject to the Character Area Overlay. This contrasts with the neighbouring Council areas of Norwood, Payneham and St Peters as well as the City of Prospect which feature a more consistent ‘streetscape’ approach to the application of the Character Area Overlay.

The Council is concerned that the ‘patchwork’ application of the Character Area Overlay that has been adopted in Gilberton creates a level of confusion amongst the community and may not result in an optimal planning approach to protect desired streetscape elements while also encouraging complementary new development. Accordingly, the Council supports the direction of Prong 1 and would welcome the assistance of the State Government to review the existing Character Areas with a view to potentially elevating them to Historic Areas.

Figure 1: Existing Character Area Overlay within the Town of Walkerville



In terms of Prong 2 (Character Area Statement Updates), the Council is strongly supportive of any initiative of the State Government to assist Councils to update the relevant Character Area and Historic Area Statements. Such an initiative would greatly assist to establish a more nuanced approach to the protection of valued streetscape character while also encouraging appropriate new development which complements the existing built form. As the Members of the Expert Panel will be aware, built form and streetscape character varies significantly across Adelaide – particularly in relation to site areas, setbacks to boundaries, materials, architectural design and the spacing around buildings (amongst other elements). Accordingly, the introduction of more detailed and location specific Character Area/Historic Area Statements within the Planning and Design Code will assist to ensure that new development complements existing streetscape character.

The Council also notes that the Expert Panel is seeking feedback in relation to a third recommendation to protect character and heritage. More specifically, the Council notes that the State Planning Commission has recommended that tougher demolition controls be introduced within Character and Historic Areas to ensure that the demolition of existing buildings can only occur once a replacement building has been approved (Prong 3).

While the Council is generally supportive of the intent of this approach, further information and investigations are required to enable the Council to provide an informed response. For example, it is noted that, currently, the demolition of a building within the Historic Area Overlay requires Planning Consent via the 'Performance Assessed' process and also triggers public notification. However, in the absence of any details in relation to the proposed replacement building, it can be challenging to assess an application seeking to demolish a building against the relevant provisions of the Zone and Historic Area Overlay. This is particularly the case where the relevant Historic Area Statement lacks detail or is relatively vague in relation to the historic characteristics of the area which should be protected.

With the above in mind, the Council suggests that the Expert Panel also consider the introduction of more detailed 'demolition' Performance Outcomes in the Historic Area Overlay while also updating Historic Area Statements to clarify the historic characteristics which should be protected. This will assist Councils to assess applications seeking to demolish buildings in the Historic Area Overlay. Having said this, the Council is also open to the idea of introducing tougher demolition controls, but would like to see further details of this approach before finalising its opinion. In particular, the Council seeks clarification that future owners would be legally bound to complete the approved works in the event that the land is sold following demolition.

3.0 Infill Policy, Trees and Car Parking

Given its location within the inner metropolitan area, the Town of Walkerville is experiencing on-going pressure for infill development – particularly in Vale Park as well as portions of Walkerville which are not subject to the Historic Area Overlay or Character Area Overlay. This development pressure, which often involves the demolition of a single detached dwelling and its replacement with two or more dwellings, is having a significant impact on the valued character of these suburbs. It is also resulting in other impacts such as a reduction in on-street parking, pressure to remove mature street trees and issues in relation to the kerbside placement and collection of rubbish bins. The Council also notes that infill development often results in a reduction of established vegetation within existing landscaped gardens as well as increased pressure to remove Regulated and Significant Trees. In this way, infill development can have a negative impact on the urban tree canopy.

While the Council notes and appreciates that attempts have been made to improve the design guidelines for infill development within the Planning and Design Code, it strongly encourages the Expert Panel to pursue a more holistic review of infill policy. For example, it is recommended that a detailed review be undertaken of the minimum site areas and frontages within the General Neighbourhood Zone to identify a range of likely development scenarios and associated implications for each Council area. In this way, informed decisions can be made in relation to the likely impact on neighbourhood character as well the impacts associated with increased traffic, loss of on-street parking, removal of street trees and waste collection.

Ideally, a holistic review of infill policy and the associated development scenarios should be linked at a strategic level to the directions contained in the next iteration of *The 30-Year Plan for Greater Adelaide*. In this way, a clear line of sight can be provided between the high-level strategic directions contained in Regional Plans and the detailed policies within the Planning and Design Code. This would also allow relevant authorities such as the Council or State Government Departments to appropriately plan for the anticipated development activity.

It will also be important for infill policy to take into account broader issues such as the provision of public open space within a walkable distance to each household, as well as access to infrastructure and services such as public transport. These are important considerations to ensure that residential areas retain their amenity for existing and future residents.

For the reasons outlined above, the Council is firmly of the view that Infill Policy is intrinsically linked to other key elements of the Planning and Design Code such as Car Parking Policy and Tree Policy. Therefore, while these elements have been separated to a certain degree by the summary papers issued by the Expert Panel, the Council reiterates that a holistic review is necessary to identify the preferred development outcome for the designated 'infill' areas around Adelaide. Importantly, such a review must include an engagement process with the affected community and other relevant stakeholders.

In terms of the potential changes to the policies affecting trees, the Council would urge caution in relation to any proposed reduction in the distance between a tree and a dwelling or swimming pool (where approval is not required). Such a change could have an adverse impact on homeowners wishing to extend their homes while also increasing the risk of damage from falling limbs.

While the Council is supportive of initiatives to encourage applicants to include more trees with their developments, it notes that this issue is closely related to the minimum site areas allowed under the Planning and Design Code. Accordingly, initiatives to increase the number of trees should be linked to a strategic planning approach with input provided by the community and key stakeholders. This will then help to shape an overarching infill policy for the region which would then allow specific policies to be introduced into the Planning and Design Code to guide future infill development in a more sensitive and nuanced manner.

Further to the above, the Council also encourages the Expert Panel to pursue a holistic review of the various zones along the arterial road corridors – including Main North Road and North East Road. Once again, such a review should be linked to the clear strategic directions provided by the next iteration of the *30-Year Plan for Greater Adelaide* and should determine a preferred policy approach in relation to key planning elements such as land use mix, building height, interface with adjoining residential areas, traffic movements and the management of waste.

The Council notes that, while the current zoning along arterial road corridors offers substantial development opportunities, there are many issues associated with this type of high-density development that need to be addressed carefully. It is also questioned whether sufficient facilities, services and infrastructure exist along some of these corridors to provide an appropriate level of amenity for future residents. For example, there is clear shortage of public open space within walking distance of the arterial roads bordering Medindie. Accordingly, the Council would be pleased to work collaboratively with the State Government and the community to ensure that an appropriate planning framework is established along these important corridors.

4.0 Conclusion

The Town of Walkerville commends the State Government for establishing the Expert Panel to undertake a review of the planning system. As outlined in this submission, the Council is generally supportive of the initial recommendations to provide greater protection for Character and Historic Areas and would welcome an opportunity to work closely with the State Government to implement these recommendations.

As also outlined in this submission, portions of the Council area are facing increased pressure from infill development which is also creating 'off-site' impacts in relation to a reduction in on-street parking and loss of street trees (amongst other impacts). Therefore, the Council strongly encourages a holistic review of the infill policy across the region. Such a review should be driven at the strategic level through the next iteration of the *30-Year Plan for Greater Adelaide* and should include a comprehensive engagement process with the community and other affected stakeholders.

The Town of Walkerville looks forward to working collaboratively with the State Government to implement the recommendations of the Expert Panel. In the meantime, please contact Michael Walmesley (Manager Planning & Regulatory Services) if any additional information in relation to this submission is required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Scott Reardon', written in a cursive style.

Scott Reardon
Acting Chief Executive Officer