

The Chief Executive,
City of Norwood, Payneham & St Peters,
Town Hall,
175, The Parade,
Norwood, 5067.

The Secretary,
Kensington Residents' Association Inc.,
Mr A Dyson,
42, Regent Street,
Kensington, 5068.
21st February 2013.

Re: Draft Kent Town and The Parade Strategic Growth - Development Plan Amendment

Dear Sir,

Our Association has reviewed the City of Norwood, Payneham and St Peters draft Kent Town and The Parade Development Plan Amendment (DPA). We offer the following comments:

Heritage and Character Protection and Enhancement

Council is to be commended for its acknowledgement that one of the outcomes of this DPA and also the Residential Development (Zones and Policy Areas) DPA is to confirm areas where residential growth will be encouraged and areas where it will be limited to protect existing residential character and amenity.

However, while the intention that new, more intensive forms of housing development will be located on main road corridors (Kent Town, adjacent parts of Hackney, Norwood and College Park), within identified regeneration areas and around major transport hubs, there is every possibility that residential character will be impacted and individual heritage dwellings compromised. We are concerned that the requirement for podiums on the boulevard and business policy areas has been removed to create a hard edge. This could have repercussions for heritage buildings resulting in diminishing their value to the streetscape.

How can there not be an impact on the existing built form, including heritage buildings, when the DPA proposes developments up to 10 storeys in the Urban Corridor Zone and up to 7 storeys high in specified areas in the District Centre (Norwood) Zone?

Our Association is pleased that *"the land use and built form characteristics proposed through this DPA have been considered on a locality by locality basis, with careful consideration given to land use and built form transition between the study areas and the adjacent zones, particularly lower scale residential zones and Historic (Conservation) Zones"*¹. "Uplift" development applications will need to be carefully assessed to ensure heritage buildings are not impacted. However, it is difficult to see how the amenity of, and streetscape associated with heritage buildings will not be impacted by the policy framework to support higher residential densities and mixed-use development opportunities. We query the extent of regeneration areas available compared to some other inner suburban council areas.

It is encouraging that Council acknowledges State Heritage Places and Local Heritage Places as being an important component of the Main Street character of The Parade and that new development will need to respect the setting of these places. It is to be hoped that new development will be sympathetic to existing heritage places and not impinge upon or overshadow them.

¹ Kent Town and The Parade Strategic Growth Development Plan Amendment pii

We note with concern that the Key Development Area at the eastern extremity of the District Centre (Norwood) Zone has an indicative building height of 1 to 7 storeys. Noting that there exists one tall building there at present, it is hoped that buildings will not be so high as to compromise the heritage buildings in close proximity at the intersection of The Parade and Portrush Road, nor heritage buildings in Kensington itself including St Josephs Convent.

A Transit-Focussed and Connected City

The increase in population at the intersection of The Parade and Portrush Road, will lead to an increase in traffic which will make this intersection even more difficult to negotiate particularly at peak times including school drop-off and pick-up periods.

On-site parking will be capped to encourage take-up of other modes of transport. This will lead to more on-street parking. Kensington is proof that dwelling size and higher densities have meant that cars that should be parked off-street are parked on the street because space is at a premium.

The DPA, which has been driven by the 'Inner Metropolitan Growth Project', has targeted areas for uplift along transit corridors. Our Association's greatest concern is that The Parade, Norwood unlike other transit corridors, does not have an existing effective mode of transport. The Parade already experiences regular gridlock and traffic congestion. The current "go zone" bus service is shown to be inadequate due to its dependence on other road traffic and will only be effective if it has a dedicated route. At the moment, it is the slowest route to the CBD.

We question why Payneham was not considered as a first option as it has bus, "O-bahn" and the Torrens Linear walking and cycling track transport options. It could be speculated that this corridor has greater land yield potential with larger sites and less heritage issues.

The study on transport focuses on car parking requirements based on existing data from Norwood and Kent Town surmising that this area has a higher uptake of alternative transport means. Does the report take into consideration that most of the traffic in this area is from outside Norwood and Kent Town where the car to person ratio per household is much higher? The report also states that it can be assumed that Kensington Road and Magill Road will become busier but does not offer a solution to this serious issue.

Our Association supports development that encourages less reliance on vehicles, but the onus to supply alternative means shouldn't have to be on the developer, this is a local and state government responsibility.

The report also targets an ageing population expected to be occupying the new developments. This market can be less mobile and have a greater dependency on cars unless there is a safe and assessable alternative.

We acknowledge and agree to the encouragement of on-site vehicle parking, bicycle parking and facilities, as well as bike paths in new development. However, safety for cyclists is the greatest concern for our residents, particularly so in crossing main roads and highways such as Portrush Road and Fullarton Road. Current intersections with dedicated bike routes rely on the goodwill of motorists, which causes stress and dangerous situations, certainly not something a child or less mobile person will undertake. Again, we are disappointed in the lack of any plan to improve the current situation that will only be worsened by the proposed increase in density.

We reiterate the comments we made in our submission in response to the draft Residential Development (Zones and Policy Areas) DPA that it is essential that a concise plan, for the movement of people that reduces the impact of vehicle traffic and brings it up to the standard of other major cities, be addressed before any increase in population occurs. Public transport to the eastern suburbs, particularly, Magill Rd, The Parade and Kensington Road, should be addressed to minimise the hazards to cyclists and pedestrians and to address how people will move through, to and from

the city with the increased traffic. Studies have proven that the successful urbanisation of cities depends upon proper infrastructure to ensure they are sustainable². The DPA could build on the success of the "O-bahn" guided bus-way to include dedicated transport for the eastern corridor. The possibility exists for the City of Norwood, Payneham and St Peters to use the leverage of the DPA to negotiate with the State Government for improved infrastructure before any increase in population. Our Association will not support this DPA until it has a commitment from the State Government and Council to improve transport issues in and beyond the target zone.

Overshadowing

We also reiterate our comments in response to the Zones & Policy Areas DPA in relation to overshadowing as follows:

The DPA proposes developments up to ten storeys high. This has the potential to create overshadowing of streets and neighbouring buildings, denying access to natural light and solar energy. The DPA should enshrine the right of access to natural light and solar energy and ensure that neither is lost nor compromised by adjacent or nearby developments. The second option proposed for the interface building height provisions assumes that the habitable space in the adjacent property will remain the same for eternity. If a development is designed around an existing house that is later replaced by townhouses, how will these new townhouses all get the same solar provisions if the whole site hasn't been included?

The DPA is premised on Adelaide's ability to sustain development to this scale. Demographer Graeme Hugo has openly questioned the Government's estimate of an increase in South Australia's population of the order of 500,000 over the next thirty years. The nature of development in Adelaide to date has been to build to the maximum allowable envelope and tends to be economically driven. Residents would like assurance that the DPA has the ability to control the quality and tenure of development so that the goal of a vibrant, liveable mixed-use city is achieved. Our Association would prefer a staged approach of an initial three to four storeys, which is more sustainable and has better street appeal. The project at No 125, Payneham Rd is a good example of where State Government targets can be achieved without over development.

Character & Amenity

We are concerned that multi-story development will seriously change the character and amenity of our residential areas and the parklands opposite Dequetteville Terrace. This is the very character and amenity that has encouraged the existing residents to move to and remain in these areas. Why spoil what has attracted existing residents to the area? The DPA notes that the Kent Town business area attracts creative businesses. This is due to its current character buildings and density that has the potential to be lost with new development.

Impact on the Parklands

The proposed multi-storey development along Dequetteville Terrace will have an adverse impact on the parklands. It will overshadow the parklands and be an unwelcome visual intrusion and obstruction. Multi-storey buildings will obstruct the existing view from the parklands towards the Adelaide Hills.

30 Year Plan Key Principles

There are 14 Key principles identified by the 30 year plan that propose to drive policy frameworks of this DPA. We are concerned that not all of the 14 principles have been given equal concern, in particular;

- Climate change resilience

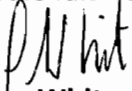
² Brugmann J., Welcome to the Urban Revolution, University of Queensland Press, Qld, 2009.

- Environmental protection, restoration and enhancement
- Natural resources management
- Community engagement

While we recognise that the DPA may bring opportunities for positive development, we have serious concerns, based on historical losses to our urban fabric and identity resulting from past amendments to planning and development laws and regulations.

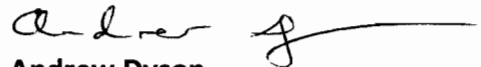
We request that a representative of our Association is given the opportunity to address the public meeting to be held at 7:00pm on Tuesday 26th March 2013 in the Mayor's Parlour.

Yours faithfully,



Sara White

President (8331 7811)



Andrew Dyson

Secretary (8331 9654)

cc The Mayor
All Councillors
Norwood Residents' Association
St Peters Residents' Association
Preserve Kent Town Association
Steven Marshall, Member for Norwood
Community Alliance South Australia