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Response to the Draft State Planning Policies

Although the Targets, Principles of Good Planning and High Quality Design Principles all could result in far better development than is occurring at the moment in Prospect, and other urban infill suburbs, there are worrying inconsistencies, confusions and omissions in the Draft State Planning Policies which need to be clarified.

Community engagement/involvement

The Good Design Principles call for meaningful, long term, ongoing consultation as shown in the following quotes from Policies

1. “Good design is contextual because it responds to the surrounding built and natural environment and contributes to the quality and character of a place” and
2. “To be effective, these SPPs must reflect the planning aspirations of the communities they serve: how do you want your neighbourhood to look and function, what are the critical ingredients of a healthy, vibrant and liveable community” and
3. “Provides a scheme for community participation in relation to the initiation and development of planning policies and strategies” and
4. “Design Standards should be developed over time that set out the desired level of public realm design for areas.” and
5. “The process of resolving potential conflict and tensions should be undertaken as efficient and transparently as possible and must involve consultation with the local community. In some circumstances the SPPs may compete or even be in conflict. To resolve these, specific regional and local circumstances need to be considered.”

Firstly, consultation involves an on-going two-way conversation in which ideas are exchanged, listened to and then used to form policy. **So far this has not happened effectively as community members have not been asked the above questions about their community’s aspirations and the quality and character of their suburbs.**

Secondly, there has been ongoing concern about the new Planning Act’s exclusion of community voice once the “Engagement” process is completed. The SPP’s inclusion of “developed over time” is very welcome as this potentially means having an on-going conversation, as does the description of resolving of potential conflicts and tensions which further means that residents potentially can voice their concerns.

This confusion about community voice needs to be clarified.

Thirdly, for the zones and overlays to be aligned with, and also lead to the achievement of, the Design Principles, local ongoing input is vital as only the locals intimately know the “desired



character” of their zone, and the LGA’s view that Councils need to be able to make sensible variations to protect the character of individual districts is supported.

The Good Designs Principles cannot be achieved without such meaningful ongoing consultations and conversations.

Principles of Good Design and Targets implementation

These principles are excellent, in principle, but only if implemented effectively. This requires the use of strong specific language and criteria rather than vague notions.

The LGA’s view of there being

“no clear mechanisms to incorporate these (the very worthy design quality statements) within the planning and design code ... which raises uncertainty about the extent to which good design outcomes can be enforced in the planning system” is supported.

Furthermore the statement that “the SPPs are not to be taken into account for the purpose of any assessment decision or application.” is worrying and confusing. The Good Design Principles and Targets can only be achieved through mandating the specific criteria, using the Principles and Targets, that developers are to meet when submitting plans.

If specific criteria are not mandated the endless rounds of submitting, resubmitting, adding more money to the project, getting it called in for “on merit” assessment by the government will continue, and the same poorly designed development will continue and the targets will not be achieved.

The Planning Design Code and Assessment of Development Proposals

As stated above, this Code needs to contain a specific list for the design of new developments so that they will in fact result in

1. “development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity”.
2. “Development designed to reflect the local setting and context, to have a distinctive identity that responds to the existing character of its locality, and strike a balance between built form, infrastructure and the public realm”
3. Development that is of a “Built form ... durable, adaptive (including the reuse of buildings or parts of buildings) and compatible with the relevant public realm”
4. Development that provides “Public realm ... designed to be used, accessible and appropriately landscaped and vegetated” and to be “inclusive and accessible to people with differing needs and capabilities (including through the serious consideration of universal design practices)”
5. “a range of high quality housing options with an emphasis on living affordability support active and healthy lifestyles and to cater for a diverse range of cultural and social activities.”



6. development that provides “better access to natural light, natural ventilation, improved orientation to reduce heat loads and more access to green infrastructure”
7. Development that is “durable because it creates buildings and places that are fit for purpose, adaptable and long-lasting.”
8. and all the excellent design qualities, and Targets of liveability and diversity etc

A list of specific criteria needs to be inserted into the proposed “Design Review” and then ticked in Development Plans to gain approval.

Most importantly two other features in the current system/code need to be overhauled.

- a. Firstly the meaning of “significant variance” (currently used to allow the building of structures that definitely do not implement the Targets and Principles) needs to be either eliminated, or strictly quantified.
- b. Secondly, unless the criteria for acceptable development plans are quantified, accredited certifiers will continue to “certify” developments not in line with the targets, as their income relies on “keeping sweet” with the developers. **Bringing back truly independent certifiers is the best solution to this problem ie having an independent body such as local council’s overview planning approvals is crucial.**

This Code must be presented for meaningful public consultation –when will we know the expected date for this to take place?

Concerns about Heritage

Heritage is a key component of the “quality and character” of a place and therefore vital when deciding on zones, sub zones and overlays. Furthermore Good Planning and Good Design Principles inherently rely on ensuring that Heritage features are included to ensure the continuing “quality and character” of places.

So it is confusing and worrying that this section of the SSPs is so short and vague, as this implicitly says the heritage issues are of low importance and will be overridden by other considerations like enabling a “productive economy” and “activation” of areas. We would like to see this section talk about the importance of preservation of State heritage and local heritage in order to protect the character of the inner city suburbs, character which draws tourists to our city due to our unique sandstone housing and our beautiful old buildings. Character within residential areas will need strong design policy to protect valued attributes.

It was heartening to read the focus on “adaptive re-use” of city buildings and this should be extended to the suburbs to also preserve existing heritage, as many of conflicts between existing residents and developers is about the destruction of the existing “quality and character” of their suburbs and the replacement with shoddy developments. The idea to encourage the retention and use of buildings (activation valued buildings & embodied energy) is supported. However, the policy



is unclear and applies to all buildings without a clear rationale provided (e.g. is it related to embodied energy, streetscape activation, better use of heritage buildings, life cycle changes).

Concerns about zones and Integrated Planning

“Good design is contextual because it responds to the surrounding built and natural environment and contributes to the quality and character of a place.” At present much of the development taking place does not achieve this and is resulting in “parasitic development”. People want to move into a suburb because of its perceived qualities of “heritage housing”, and “quiet, green leafy streets” and therefore higher value, more expensive housing. However over time these streets become noisy “rat runs”, heritage housing is replaced by dull look alike two storey intrusive, energy inefficient status symbol houses and the “quality and character” is parasitized and destroyed, as is happening in Prospect currently.

Careful thought about the zones, sub-zones and overlays could preserve a lot of existing character while allowing well designed, in line with the Good Design Principles, new housing to be built.

There is no detail in the proposed SPPs about possible zones, the only possible list given is in the Integrated Planning section, of “natural areas, rural areas, outer suburbs, middle suburbs, & master planned communities inner suburbs, & infill development and city centre”.

These are too broad and as the LGA stated “ Councils want to be able to make sensible variations to protect the character of individual districts”. Prospect and Unley are very different in character, and Fitzroy in Prospect is completely different from Nailsworth in Prospect in character.

There must be consultation about the zones and mechanisms for re-assessing these zones or the Good Design and Good Planning principles cannot be met.

The statement “In areas of transition, good planning and the integration of design will help community infrastructure and services keep pace with this transition and enable development that complements the valued characteristics of these places” highlights another problem occurring in infill suburbs.

Bowden Brompton’s urban renewal concept overcomes many of these as it has a master plan which shows potential builders the type of development occurring in the separate allotments. However in suburbs like Prospect there has been no coordination as builders have bought single house blocks and crammed as many units in high rise apartments to maximize their profits. This has resulted in a multitude of problems – overshadowing, set back issues, street activation destroyed, car parking and rubbish collection problems, and destruction of green space.

This uncoordinated development definitely does not “improve the liveability and sustainability” of the local area. Prospect Council has recognized that more integrated planning is needed and amended its Development Plan to reflect this and needs to continue to have a voice in planning decisions to make sure the Good Planning and Good Design Principles, and Integrated Planning objectives are effectively realized.



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Furthermore, there needs to be more consideration in State Planning Policies about housing choice to meet future demographic needs, for example, smaller more affordable housing options with good design outcomes that meet the desired character. There is too much emphasis in the Discussion Paper towards small lot housing and aged care accommodation without looking at other housing and living options that allow for affordable housing choice and ageing in place (e.g. laneway, dependent accommodation and accessory housing on the same lot as the main dwelling).

Concerns about omission of Open Space & Climate Change mitigation

The discussion paper draft policies have not addressed 'Open Space' planning with the only reference is to describe 'high quality, functional and accessible public green spaces and streetscapes' under 'Design Quality'. Open Space is an increasingly important land use issue, particularly given 30 Year Plan targets around active lifestyle and urban forests (tree coverage). The draft policies need to address what open space provision and type of open space is required within urban areas with higher densities and what new housing models may be applied. There is a lack of discussion about the impact of the construction industry and recycling building materials, better use of embodied energy and adaptable buildings instead of standard practices of demolition and re-development.

Concerns about terminology and inadequate definition and explanation

Terminology and terms e.g. 'high quality design', 'complex developments', 'access and inclusion planning' need definition and explanation.

Caroline Ashmeade

Secretary

Elizabeth Crisp

President