

**SUBMISSION TO THE PRODUCTIVITY COMMISSION ISSUES PAPER, MAY,2010:  
 Performance Benchmarking of Australian Business Regulation:  
 Planning, Zoning and Development Assessments.**

Page 1 "Save Our Suburbs - Adelaide"

**From: "Save Our Suburbs - Adelaide".**

To: The Productivity Commission,

Dear Sir,

**Submission on enquiry into planning, zoning and development assessment**

Our Association makes the following points in response to the terms of reference questions posed in the discussion paper.

- *"On what matters should the planning, zoning and DA related decisions and actions of governments be coordinated? How should performance on these matters be benchmarked? Are there particular examples of where land development and development of other urban infrastructure (such as transport and schools) are or are not well coordinated? What costs (benefits) does poor (good) coordination between levels of government create for:-*
  - *property developers*
  - *businesses, aside from property developers*
  - *government agencies and local governments*
  - *residents?"*

Infill housing developments in several suburbs of Adelaide are increasing congestion in small streets. As detached houses and gardens are demolished to be replaced with two or three units, streets are becoming more heavily used for car parking. The addition of more driveways to accommodate more dwellings is also removing car parking spaces available in streets. Our members have provided us with examples where this vehicle congestion is causing a lower quality of life for residents in many streets in older suburbs such as Collinswood and Norwood. The theory that people who live in medium-density housing will use public transport is a simplistic one, in that most adults each tend to own a car for use in travel to locations not served by public transport. Planning rules should ensure that every dwelling should provide two off-street on-site parking spaces, with one additional car parking space for each additional two bedrooms or part thereof. e.g. a dwelling with 3 bedrooms would require three car parks, a four bedroom dwelling would also require 3 car parks, and a 5 bedroom dwelling would require 4 on-site car-parking spaces. Planning rules such as this were almost universal in suburban council Development Plans, until successive relaxations of these off street requirements were imposed on Councils by unelected State Government Planning Departments, ever since the misguided "Urban Consolidation" concepts, promoted heavily by the Development Industry lobbies, and acceded to by compliant professional planners high-up in State Government circles, who are keen to curry favour with the developer companies who may be their future employers.

It is unfortunate that one of the adverse effects of placing higher rank Government employed planners on five year contracts, (seen as providing economic savings and efficiencies), has instead resulted in this group of employees working for Government for a time, then for private consultancies. This lack of continuity of climbing the ladder of a lifelong career as an idealistic public servant planner, who seeks the very best planning outcomes, instead produces employees who avoid the old concept of "frank and fearless advice to their Government Minister, or Councillors", and who ensure that they do not offend their potential future employers.

We submit that high rates of population growth are lowering the quality of life of existing residents in good quality suburbs, whenever they are subjected to any urban consolidation.

Where any derelict industrial suburb is economically depressed and housing quality is of a low standard, urban renewal on larger consolidations of allotments may improve streetscapes and urban amenity, provided that the designs provide high amenity dwellings, with adequate outdoor open space, and room for tall trees. However there should be better coordination and targeting of where such housing is desirable and where it is not, so that areas targeted for redevelopment at medium densities also receive the upgrading of infrastructure, services and public open space which a greater population will need.

Residents who have bought houses in good quality low-density fully developed suburbs have a right to expect that the planning process administered by their elected Councillors and State Government Parliamentarians will provide an absolute security in knowing that future housing re-developments in their streets will respect the existing character and established pattern of development in their streets. At present, a growing number of residents live in fear of bulky new multi-unit multi-storey infill developments being crammed on to nearby blocks of land which reduce the character and amenity of their homes and suburbs. Every member of this Productivity Commission should ask themselves when they last met a member of the public who wanted more cars driving down their suburban streets every day, more cars parked in their street, or more people crowding on to the already crowded public transport vehicle during their daily commuting. A bigger population may provide more sales and profits to the development industry, but it reduces the existing quality-of-life for every individual living in the locality or city. Longer travel times to and from work, school and sporting activities are not only inefficient from an energy usage standpoint, but also reduce the quality of the reduced amount of “free-time” remaining, after one arrives home exhausted from the stop-start, congested journey.

**2. *“Should governments have a role in the merging of small separately-held parcels of land into larger plots in order to facilitate large-scale developments? If so, why?”***

We believe that governments should not be involved in merging parcels of residential land to facilitate large-scale developments. This should be left to the market-place. However, if governments wish to be involved in fostering large-scale high density housing ventures, as demonstration projects, then they should, at the very least, confine themselves to buying up redundant industrial or commercial land to facilitate this, and not be guilty of selling off school ovals, schools, university playing fields, or heritage hospitals built within acreages deemed essential for well-being in the 19<sup>th</sup> century, but now viewed by too many state politicians as providing extra sources of Government revenue. Each piece of public open space sold for medium and high density “infill” not only reduces the overall open space for the existing community, but further reduces the square metres of such space per head of the now much larger population. Patrick Troy, Emeritus Professor of Urban Planning, has in his various books demolished the concept that “urban infill” or “urban consolidation” saves Governments money, in more fully using the existing infrastructure. He has comprehensively shown that each additional dwelling increases the likelihood of overload of the existing sewer, fresh water, electricity, road, public transport, school and hospital and telecommunications infrastructure networks, and renewal and additions to these cost many times more than providing new infrastructure in a greenfield site. Residents in existing residential suburbs should not have large-scale infill housing projects foisted on them. Governments buying up large quantities of residential land for such projects are likely to engender public disquiet and political opposition. If the Federal government reduced its mad population growth strategies with very high legal rates of immigration of 300,000 per year, the mad rush to upgrade infrastructure could be reduced so that actual improvements to infrastructure could occur, instead of every “upgrade” being overwhelmed by increasing usage, increasing congestion traffic delays, and a lower quality of life.

Australians DO NOT WANT TO LIVE IN SINGAPORE, HONG KONG OR NEW YORK CONDITIONS. The “Sienfeld” or “Friends” TV shows, set in New York, is not the aim of most Australians.

***“Is information on proposed developments available to local communities and all potential land buyers, or users during the planning/zoning/DA processes in a complete, effective and timely manner?”***

There is very little information provided to local communities about proposed developments during the development assessment process. We think this is a poor situation. Neighbours should be advised and invited to comment on new housing proposed on property next to or near to them, particularly when such

housing increases residential densities. At present, most people only learn about a new residential development in their street or next-door when the bull-dozer appears.

Category 3 development applications under the South Australian Development Act 1993 does provide for public notification of proposed developments but this category covers only a tiny percentage of all development applications in this State, probably less than 5 per cent.

In terms of formal public consultation by local councils when zoning or planning regimes are being changed, councils make efforts to engage the community. However the language of planning is somewhat arcane.

(Planning “speak” is not closely related to the English language and reading any Development Plan would lead those unfamiliar with the planning assessment process to believe that there are good protective clauses to prevent inappropriate or ugly development in their street, when in fact, their Local Council’s Development Plan’s words’ “Plain English” interpretation is overcome completely by professional planners’ interpretations, made in the light of many arcane decisions in the Planning Appeals Court, renamed in the South Australian case as the ERD [Environment Resource Court], such renaming being a further example of the whiff of VERY DELIBERATE OBFUSCATION OF THE WHOLE PLANNING PROCESS, cheered on by the Developer lobby groups, such as the Property Council). Few people become involved in this process at this stage of the development cycle, and those who do usually leave in a state of confusion or disgust. When people do become motivated to become involved, i.e. at the time their neighbour is about to demolish a house, it is almost always too late for people to have any input into the development assessment process. The deliberate imposition by successive so-called “Planning Improvement Programmes” which have forced the relaxation of most suburban and City CBD Council’s Development Plans are designed to remove any effective representation by their elected Councillors of the communities’ desires to “protect their suburbs’ quality of life” This lack of public involvement creates a good deal of animosity and cynicism among the general community about development, and leads to a regard of developers as being “the lowest form of life, worse even than used car dealers”

***“To what extent does influence by interested parties, particularly those who may be politically active within the community, affect the decision-making processes? Does this improve or worsen outcomes? In what way? Do the views of these parties typically reflect the broader community sentiment?”***

We submit that developer lobby groups such as the Property Council exert enormous influence over politicians and the media. We believe that property developers should be completely barred from making donations to political parties as these donations not only appear to buy political favours, but create a cynicism amongst the electorate which is corrosive to good democracy. The push for faster development approvals has recently been enshrined in a Residential Development Code in South Australia. This Code dumbs down planning decisions by imposing a simple tick-a-box check-list for new developments and ignores important character and amenity aspects which are the basis of good planning decisions. Our suburbs are set to become less pleasant places as the new tick-a-box housing gets rolled out over the next few years. The extremely high site coverage, (up to 70% on the smallest allotments), and tiny allotment sizes allowed by the Code ensures that our suburbs will be less sustainable as denser bigger dwellings eat up space formerly set aside for shady trees and gardens which served to reduce use of air-conditioners in summer. Trees and gardens also provide important habitat for urban wildlife which will dwindle as housing densification proceeds. The ongoing higher energy usage required in these modern unsustainable housing types, which are nearly all of the “brutalist” and “cheap and nasty” designs, fly in the face of global warming trends, and their requirement for additional electricity to air-condition them to liveable temperatures makes the “reduction of carbon usage” doubly difficult.

We submit that the views of property developers are extremely self-interested minority views which do not generally reflect the views of the wider community.

In terms of the influence of conservation bodies such as the National Trust, the Civic Trust and nature conservation bodies, we believe that the influence of such groups is generally beneficial as they foster an

ethos of conservation, appreciation of streetscape character and amenity in residential zones and conservation of the natural environment. We submit that the views of these groups are generally much more consonant with the views of the general public than are the views of the development lobby.

It is puzzling to the general community to listen to politicians from both of the major parties blather on about sustainability, in the last decade which has seen major water restrictions in every State Capital, and many regional cities, whilst supporting population increases beyond the natural increase by strongly supporting the 300,000+ legal immigration rate each year, probably in fear of offending various migrant lobbies, but we believe that the general Australian view, even amongst recently arrived immigrants, is that the high immigration rate is making housing unaffordable for the current 18-35 year old generation.

### 3. ***“What characteristics make a city more/less liveable and easy for businesses to operate in?”***

We submit that rapid population growth is decreasing the liveability of Adelaide in terms of defining liveability as a combination of environmental quality, neighbourhood amenity and individual well-being (Issues Paper p. 23.) The destruction of good quality housing in quality residential suburbs and their replacement with dense multi-unit dwellings of unsympathetic styles, high site covers, almost total lack of private outdoor space, inadequate off-street car-parking provision, and low environmental performance is a public disaster. Our suburbs are becoming less sustainable as gardens are replaced by air-conditioners and high levels of concrete and paving, which generate unprecedented volumes of stormwater run-off. The latter cause risks of flooding and force local councils invest in upgrading stormwater systems to cope with the extra run-off. Environmental quality is decreasing in our city as population grows, housing density increases, road congestion and consequent journey travel times increase, and public open space is “sold-off” to “developer mates”, i.e. those same groups who provide the largest donations to the major political parties.

Making people live ever closer together in dense housing reduces individual well-being, as conflict over noise and life-styles grows. We can provide many examples of neighbours driven literally crazy by the noise generated by residents in new close infill housing, but space does not allow us to detail these here. We have noted a trend to higher rear and side fencing as residents try to protect their privacy when new dense housing is inserted into back-gardens and on adjacent properties. This can lead to a loss of neighbourliness as neighbours become invisible to each other while noise increases. This decreases neighbourhood amenity and individual well-being. When a rear garden is covered with built form, medium and large trees are removed, and the area becomes more urban than suburban, and bird visits to rear yards are diminished.

The policy of enforcing housing densification on to reluctant communities has seen a centralization and legislation to make deliberations of the planning process in secret to ensure that dissent and disquiet is silenced, e.g. the Development Advisory Committee [DAC]. The SA Government has legislated to diminish the role of elected Councillors to a maximum of three elected members on Development Assessment Panels, [DAPs], with four independent members who have “expertise” in Planning, Building, Architecture or Government, i.e. a majority of independents, and the chairperson MUST be one of the independent members. The elected Councillors on these DAPs are specifically forbidden by law from discussing any planning assessment matter with any citizens in their electorates, or from anywhere else, and so to are the independent members on the DAPs.

The State Government’s chief planning advisory group, the Development Advisory Commission, [DAC], holds all of its meetings in secret, [in camera], the very opposite of a “transparent” procedure. The DAC has a 100% record of approving applications which have been refused by the Adelaide City Council’s DAP. All of the members of the DAC are directly appointed by the Minister of Planning, and are hence beholden for their position to the Minister. Again the Property Council cheers the process from the sidelines. The community becomes resigned to feeling powerless, because both of the major parties likely to form a government behave identically when they are in power. That is, they directly act to alter the planning process in favour of the big donor developers, and they grant “Major Development Status” to over-ride Council Development Plans so that Adelaide can be made uglier, but more profitable to the developer donors. WHY DOES THIS SMELL SO BADLY?

This increased authoritarianism of the planning system has disillusioned much of the public and side-lined

their local representatives in local government. It is our belief that good planning takes into account community concerns. By allowing local residents to have a say about proposed new developments, these new developments can be improved – to the satisfaction of all. By silencing residents, public disquiet grows. This decreases individual well-being.

Reductions in individual well-being incur costs for businesses through decreases in employee productivity. Dense housing in mixed use and business zones can drive businesses out of such zones, as is happening in parts of Adelaide. This increases business costs. Road congestion is also a cost for business and population growth and housing densification have major impacts on this congestion.

***“What challenges do governments and communities face in pursuit of liveability goals? How can these be addressed by planning, zoning and DA systems?”***

Rapid population growth and housing densification policy present real obstacles to sustaining liveability standards in Australian cities under stress. We submit that decentralizing population into regional towns and areas could help reduce pressure on Australian cities. This should be built into planning policies for the future. We are pleased that the Minister for Sustainable Population may be considering decentralization policies. Some rural areas would benefit from modest population growth.

Even within cities, some decentralization would be desirable. In Adelaide, a second city centre at Elizabeth has been suggested by the economics Professor Dick Blandy who addressed our annual general meeting on the 29<sup>th</sup> of April, 2010, in Norwood. A second city centre would take some pressure off the inner suburbs where developers are razing stone houses in garden suburbs in favour of dense energy-guzzling wall-to-wall multi-unit concrete boxes. To help get jobs into decentralized target sites, government service departments could be relocated there. Decentralization is resisted by city centre interests who want everyone to have to travel to congested city centres to do business. But good decentralization policy would benefit the liveability of our existing cities by reducing population and development pressures. Rapid population growth, however, will eventually overcome all well intended planning regimes.

Australia's immigration program should be scaled back to more sustainable levels. It is not sustainable to be adding some 450,000 people to our population every year in, what is, largely a desert continent.

Planners should have the courage to speak up about the population growth issue instead of bowing their heads and just worrying about how to cope with it. Our cities cannot be liveable places if they become too big and congestion and water supply worries continue to grow. The inability of residents to water their gardens and lawns destroys the quality of backyard cricket games, barbecues and outdoor gardening pursuits, and the water restriction regime which makes unlawful the usage of automatic sprinkler systems, force the house proud gardeners to stand holding a hose for several hours a week, attempting to provide the same efficiency of distribution as the sprinkler system managed to do automatically, and without using any more water!. With low and finite water sources, more people means even less water per head of population. If we all really wanted to live in lower amenity circumstances, we could move to Coober Pedy, to experience the joys of dust and clay and heat. The current water restrictions have caused the almost total loss by death of Birch and “James Stirling “ ornamental and shade/screen trees from our Adelaide gardens.

***4. “What are the social, environmental and economic reasons for which governments may wish to control the supply of appropriately zoned sites for development?”***

The planning profession will answer this better than we can. However, by restricting the greenfields site availability, even in areas zoned for residential development, the Government owned “Land Management Corporation” maximises the Dollar value of every allotment by creating a “shortage premium”, where potential land purchasers are forced to outbid other interested purchasers. This rise in land value, as a total proportion of any [house and land cost], is detrimental to the well-being of the current “parental home leavers”, who are forced to pay higher rents for the higher value dwellings available, which makes their opportunities to save to purchase their own free-hold dwelling even harder.

***“Should local and state governments require developers to commence development within a certain time frame? What discourages timely completion of developments?”***

We believe that it would improve the functioning of our development system if developers were required to commence development within a certain time frame. The appearance of cities is down-graded if development sites are left in derelict and unsightly condition for lengthy periods of time. Many factors may contribute to delays in completing developments, including economic conditions. Rarely are there genuine delays caused by the planning process, despite a history of patently false claims made by the developer lobbies, false claims repeated by the State Government Planning Department, and then repeated by various Ministers of Planning from both the major parties, despite refutations from the CEO's of Councils who have been most maligned by these claims. These CEOs have sent letters to the Minister, and to the State Government Planning Department, and I have copies of them.

It is immensely disappointing to discover that senior persons in charge of this very important process of maintaining and improving the amenity of life in Adelaide can treat their capital city with such disdain. Developers may also be sitting on a piece of land hoping its value will accumulate over time before they move to sell it. At the least the land should be required to be landscaped to improve its appearance if the development is delayed.

***“What impact would limiting opportunities for third party objections/appeals and so fast-tracking projects through planning and DA processes have on the supply of land for different uses?”***

We submit that any further limits placed on third party objections/appeals in planning and DA processes would have a minor impact on the supply of land for different uses, at least in South Australia. The very small number of DA cases which allow third party appeals/objections in this State have little impact on the supply of land.

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The next section of this submission is an updated copy of an open letter to S.A. State Parliamentarians, originally sent on 12/09/2008, in response to the State Government's so-called Planning Reform Proposals\_ Introduction of Residential Code. I have included this document because the later parts of it contain a very logical and objective case for the community's proven and ongoing desire to live in detached dwellings on low site coverage allotments. Promoters of “Urban Consolidation”, “Infill Development” and now “TODS”, who include the Development Lobby organisations such as the Property Council, planners who were educated in planning since the mid 1980's, when it became the “latest fad”, and many State Government bureaucrats and Parliamentarians who have been persuaded that densification is the lowest cost and most efficient use of already built infrastructure, prove the case against the desirability of these developments because none of the members of these groups wish to live in these types of dwellings.

Open Letter:

Dear Friends, Concerned Residents Groups of Adelaide, and I hope Concerned Parliamentarians, The State Government's so-called Planning Reform Proposals, due to come into effect from March, 2009, is a blatant pandering to the self-interested Development Interests. The proposals do not come from Planning SA, but from a Victorian consultancy, at the behest of the development interests on the Economic Development Board.

These proposals strip out 90% of the current rules, as set out in each Council's "Development Plan", and also the over-arching State Development Plans.

**It is a proposal for "OPEN SLATHER. The NO RULES set of rules" for Planning in South Australia**, and will encourage the destruction / demolition and easy sub-division of over three quarters of Adelaide's blocks land, many of which contain Adelaide's lovelier old houses, to the benefit only of the developers. Such destruction will be Mike Rann's legacy. I find it hard to believe that he has not taken notice of the fate of Jeff Kennet, who was thrown unceremoniously out of his office of Premier of Victoria, shortly after introducing similar "open slather" planning rights in that state in the late 1990's. Mike Rann deserves to suffer the same electoral defeat if he does not remedy these awful anti-community proposals.

**AFFORDABILITY**

Permitting easy rules to allow sub-division does NOT REDUCE the costs of dwellings. Instead, allowing easy sub-division pushes up the prices of older, run-down dwellings, making them unaffordable to first home buyers. As a Councillor for the City of Mitcham since 1991, I have observed developers, who intend to sub-divide and reap the maximum profit. outbidding 1st home buyers for perfectly liveable dwellings The developers are able to pay much higher prices than first home buyers, and actually "push-up" the going prices in the area. They can afford to do this BECAUSE weak planning rules (which permit easy sub-division) allows them to build two (or three) new dwellings, and sell each of them for 30% - 40% higher than the price of the original house. THE DEVELOPERS CONTINUE CLAIMING THAT SMALLER ALLOTMENTS BRING DOWN THE COST OF DWELLINGS, DESPITE 30 YEARS OF EVIDENCE TO THE CONTRARY( see the Demographia website, below).

## **DEMOGRAPHIA, 4th Annual Demographia International Housing Affordability Survey**

I urge all of you to print this paper, and read it.

[4th Annual Demographia International Housing Affordability Survey](#)

[SMART GROWTH & URBAN CONSOLIDATION: THE HIGH SOCIAL & ECONOMIC COSTS  
227 Markets in Australia . Canada . Ireland . New Zealand . United Kingdom . United States](#)

**Former Reserve Bank of New Zealand Governor Donald Brash** writes in the introduction to this *4th Annual Demographia International Housing Affordability Survey* that "the affordability of housing is overwhelmingly a function of just one thing, the extent to which governments place artificial restrictions on the supply of residential land." This report describes the economic consensus that "smart growth"/ "urban consolidation" have destroyed housing affordability in many urban areas. The scarcity produced by smart growth and urban consolidation markets has serious social and economic consequences. The resulting asset bubble has interfered with economic policies of central banks, as in the US and New Zealand. Yet, in responsive markets, housing affordability remains robust, including the three fastest growing large markets in the high income world, **Atlanta, Houston and Dallas-Fort Worth** and in other Canadian (such as **Ottawa**) & US markets.

**The detailed analysis on 227 world-wide "developed western city" comparative housing costs, published on the website of the research group, Demographia, <http://www.demographia.com/> is an outstanding example of how pushing for "urban consolidation" actually pushes prices up.** Too many parliamentarians, of all political parties, have accepted at face value the outdated and falsified 1980's arguments of a group of "expert planners", the promoters of "urban consolidation," who see their role in life as facilitating the interests of the most rapacious of the development industry. Many builders, such as Bob Day, and real estate agents, recognise that the destruction of the quality of Adelaide's streetscapes only diminishes our quality of life.

The maintenance of the low density of dwellings, the high quality of open front gardens, most of which have 8-10 metre front setbacks, (the "setback" is the distance from the front boundary fence to the front of the dwelling), is critical to that amenity and quality.

I urge you to read the accompanying attachments, and review the Mitcham Council's Planners' report on the total inadequacy of the proposals.

Save Our Suburbs - Adelaide is supportive of good quality re-development, but not at the expense of quality existing homes are suitable for restoration and/or extensions, as this is energy inefficient and environmentally unsustainable.

Our organisation is not "anti-development", but encourages any development which maintains or improves the existing amenity, and which complies with the Local Council's Development Plan. This means that replacement dwellings, which are appropriate when the existing house is not economical to restore, MUST be complimentary to the street, reflect similarity of styles and maintain similar block size, open space to built ratio and materials of construction. We strongly



oppose intrusive, poor quality development which downgrades the locality, such as ugly "all garage door frontages", lack of eaves, open space for children's play or space for essential shade trees. We oppose the trend for dwellings to be parapet wall fronted, which creates a "prison architecture" style, and there should be some controls on heavily painted render in garish purples etc.

## **The rules of planning could be so simply expressed, for fully built suburbs. Proposed Rules are in Blue, comments in Black Text.**

1. Nothing should be approved unless it improves, and at least maintains, the amenity and streetscape of the vicinity.
2. Maintaining the existing front boundary setbacks to the dwelling frontage, maintaining the traditional 30% to 40% maximum site coverage, with driveway access to the rear yard, and private open space backyards of 200-300m<sup>2</sup> is essential to the continued existence of "child-friendly" housing. This type of house, common in the inner and middle suburbs, and sitting on allotments of 650m<sup>2</sup> to 750m<sup>2</sup> in suburbs built from 1920 to 1980, so obviously sought after by young families that the price of such dwellings, even if they are run-down, has continued to rise at rates far higher than newer town-house and semi-detached dwellings which have been intrusively inserted into these suburbs. These smaller allotment dwellings provide "doll's house" amenities on "matchbox-sized" blocks, with only tiny outdoor courtyards for entertaining and children's play. The great majority of these buildings are cheaply constructed, and after their first "newness value" recedes, they become the unwanted dwellings with significantly lower rates-of rise in values. **Leading Adelaide academic geographers and demographers have presented papers at planning conferences in Adelaide which demonstrate that over 80% of the population in Adelaide and Australia desire to live in detached dwellings.**

**35 years of the development industry telling us all that "you want to live in a medium density, 3-6 storey unit, to be able to enjoy the lifestyle of meeting at the local coffee shop" has not altered the desired living environment of Australians. We like our suburban lives, and coffee under the back verandah, or around our kitchen table, is not only less expensive, but we can actually listen to each other's conversation.**

3. Every owner who buys in a fully built suburb, has the right to expect that the qualities of that suburban environment will be maintained, by the planning authority.
4. Every suburb has its own character, and the maintenance of that character is best kept under the control of the local community through well-written rules, administered by their Local Council. The proposals in the "weasel word" "Better Planning, Better Future" are a "one-size-fits-all" concept, which is only in the interests of the developers who wish to squeeze the maximum profit from each block. The destruction of Adelaide would be the result if they are passed by Parliament.

5. The existing owners' / neighbours' rights should be given a higher weighting than transient "blow-in, blow-out" developers who are seeking only the maximum profit.

Many heritage and character builders and architects, who often live in the suburbs where they carry out most of their work, perform excellent additions, renovations and completely new replacement dwellings where that is most reasonable, and their work is uniformly admired and approved of by their neighbours. Pauline Hurren is probably the best known of such architects in Adelaide.

6. These rules (plans) are to ensure that only complimentary development occurs within this precinct.



## WHY IS URBAN CONSOLIDATION THEORY WRONG-HEADED.

Many theorists of economics, and planning, seek a denser, high-rise concentrated form of building, with claims that their aim is to improve the economics of public transport, and a concept of everyone walking, cycling or taking public transport for 90% of their required journeys. **Save Our Suburbs believes that these theorists should build a "trial city" of this type, and see how many residents seek to live there. These theorists want to "fit the population to the city", rather than fit the city to the desires of the population.**

### IMPORTANT QUOTATIONS FROM SENIOR PLANNERS AND SOCIAL RESEARCHERS:

Much of the following quotations are taken from a paper written by Peter Johnson, with assistance from Stephen Fisher, which Peter presented at a major RAPI Conference held at the Hilton Hotel around late 1991, the full text of which is attached. Peter was invited to give a "Resident's View of Urban Consolidation," because he was then the President of the **Westbourne Park Residents' Association**. Peter later served as a Councillor for Gault Ward, on Mitcham Council from 1995-2000. Given that it was written in 1991, it is frightening that it was so prescient with regard to successive State Governments' (from both major parties) continued adherence to the policies of Urban Consolidation which were already discredited by the evidence from the studies quoted below, and despite the strong evidence in the Planning S.A. Department's own (largely secret) studies that Urban Consolidation (and its latest incarnation, Transport Oriented Developments or TODS) was singularly disliked by the community. At the most recent PIA conference on increased density, an additional paper was given by an Adelaide University Geography academic which showed that in 2008, over 80% of the population wished to live in **single storey detached dwelling in its own garden**. This figure is in remarkable concordance with the objective evidence presented in Peter Johnson's Paper. The Paper also canvassed likely future problems from lack of water available during drought years from the River Murray, due to the construction of an increasing number of dams and interceptions upstream in the eastern states.

1. **Dr Michael Lennon, Director of the 1990 S.A. Planning Review**, summed up the community's attitude on ABC's Lateline programme "The End of the 1/4 acre block", where he said:

**"Everyone seems to support urban consolidation except perhaps the vast majority of the Australian public."**

**"We've got to be careful in my view not to see Urban Consolidation as just another panacea, the latest snake oil that's going to fix everything. the truth is, as planners, as public officials we need to be avoid the intellectual arrogance that assumes that we know better than everyone else, that somehow life in the suburbs is dreadful."**

**" We need to ask the people of Australia whether in fact they like the suburbs. The truth is we planned them (the suburbs *my addition*) because the standards of housing, the kinds of areas that we created were what people wanted. If we want to turn over 150 years of culture in Australia, we are facing up to a very big task and I am not confident that we will succeed. That is not to say that we can't do big things in urban consolidation, **but we are not going to contain the cities, and we are not going to turn upside down the legitimate aspirations of the Australian people.**"**

2. The Victorian Department of Planning and Urban Growth commissioned a detailed study on Medium Density Housing (by Tract Consultants; Swinburne Centre for Urban & Social Research; & Sarkissian Associates). The final report of October, 1990 states in the Executive summary:

"There is a high preference (somewhere between 75% and 90% amongst Australian housing consumers for a detached house"

"Additionally, this preference often manifests itself as resident reaction against the introduction of medium density housing in existing neighbourhoods".

3. The S.A. Planning Review commissioned a report, dated October, 1990, titled "Housing and Location Preferences and the Quality of Life in Community Environments" by Dr Christine Stevens and Professor Riaz Hassan, [ARC Australian Professorial Fellow and Emeritus, Professor, Flinders University, South Australia].

**It provides detail on the actual "real-life" desires of Australians in their housing choice, but because it did not accord with the "accepted wisdom" of the day, it was not released for publication. This lack of publication is scandalous!** The copy of the report in our possession has a large "LIMITED CIRCULATION" embargo on the first page, and the larger disclaimer on the second page states:

**"THE OPINIONS CONTAINED IN THIS REPORT DO NOT NECESSARILY REFLECT THOSE OF THE SOUTH AUSTRALIAN GOVERNMENT NOR THE PLANNING REVIEW"**

Quotes from this document: "Housing and Location Preferences and the Quality of Life in Community Environments"

Page 3: **"The house type most preferred was the single storey detached dwelling in its own garden irrespective of age, sex, marital status, household type, ethnicity and income. The advantages of this house type were that it was considered to be more private, spacious and varied than other housing forms."**

Page 15: "It has been found that generally most elderly people do not regard occupation of housing which may be too large for their current needs as a problem, **although planners may do so."**

Page 23: It could be suggested most people prefer / occupy detached housing on quarter acre blocks because

[a] this is the dominant housing form available,

[b] people want what the majority have, not wishing to be different from others,

[c] this is the only form of housing most people have experienced, therefore their preferences are shaped by that experience,

[d] **such housing is seen as intrinsically more valuable than medium density forms or flats,**

[e] **that value is seen as an important means of providing economic security in old age,**

[f] **it provides a means of occupying spare time which may be difficult to fill in smaller accommodation."**

Page 39: "Single parents generally wanted the same house type as nuclear families with children, as their need for indoor and outdoor space was no different from that of traditional families."

Page 40: "Many elderly home owners, (couples and single people), had three bedrooms, but were not perturbed by occupying a large dwelling. The extra rooms were said to be used for their hobbies, or housed grandchildren and friends on occasions."

Page 64: **"The difficulty for many people who were ready to prescribe urban consolidation as the preferred form of future development, was that this support was largely theoretical. They themselves did not want to relinquish any of their own private outdoor space. neither did they necessarily want change to occur in their own suburb."**

Page 65: **"The dilemma for the majority of those who considered urban consolidation necessary in the future was that they themselves preferred to live in single storey detached housing of low densities."**

4. Quotes from Peter hall, a consultant to the 1991 Planning review, quoted from the May / June, 1991 issue of S.A. Planner, are also highly relevant:

**" Adelaideans are attracted to their one-eighth acre (500m<sup>2</sup>) or quarter acre (1,000m<sup>2</sup>) plots. This has given them a remarkably even, homogeneous, egalitarian kind of society. It's something that other parts of the world would, (and should), envy."**

**"Consolidation can mean slummification, or the creation of instant slums."**

5. Books by noted Australian planning and humanitarian thinkers such as Professor Patrick Troy, and Hugh Stretton have demolished the arguments in favour of Urban Consolidation, and defended the essence of Australians love for their suburbs and their suburban dwellings, on blocks which have room for gardens, play and barbecues and work-sheds.

### **Conclusion.**

**If these proposals pass through Parliament without extensive improvements, Adelaide's amenity will be trashed!**

**Do you want your street and your electors' streets to be damaged by short sighted, self-interested developers?**

[http://www.mitchamcouncil.sa.gov.au/webdata/resources/files/SUBMISSION\\_BY\\_THE\\_CITY\\_OF\\_MITCHAM\\_ON\\_THE\\_PLANNING\\_REFORMS\\_2008.pdf](http://www.mitchamcouncil.sa.gov.au/webdata/resources/files/SUBMISSION_BY_THE_CITY_OF_MITCHAM_ON_THE_PLANNING_REFORMS_2008.pdf)

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Thank you for the opportunity to make these comments. This document has been prepared jointly with other elected members of metropolitan councils, each with extensive experience serving on Development Assessment Committees, and the newer Development Assessment Panels.

**Yours faithfully,  
Stephen Fisher (President)  
Save Our Suburbs -Adelaide.  
16<sup>th</sup> July, 2010**

*Biog: Stephen Fisher has been an elected member of the City of Mitcham Council since May,1991, Councillor For Gault Ward 1991-1995, Alderman 1995-2000, Deputy Mayor 1997-2000, Councillor For Gault Ward 2001-2010 ongoing. Vice President of "Save Our Suburbs", 2005-2008, President 2008-2010.*

**End.**

