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7<sup>th</sup> February 2009

The Chief Executive Officer  
City of Unley  
181 Unley Road  
Unley SA 5061

Dear Sir

**RE: Amendments to the City of Unley Development Plan**

Friends of the City of Unley Inc. (FOCUS) strongly supports the Development Plan Amendment Stage 1 (DPA1): Residential Historic Conservation and Streetscape Character Areas Pilot.

FOCUS commends the Mayor of the City of Unley, the Chief Executive Officer and staff, especially Mr. David Brown, and elected members on recognition of Unley's heritage and character in the DPA Stage 1. Our community group acknowledges that this plan is the result of five years hard work and persistence on the part of the Council. We also acknowledge that this is part of a three stage process, and look forward to being able to support continued efforts by the Council to recognise and protect as much as possible of the heritage and character of the City of Unley in future stages of the plan.

FOCUS is not a group of professional planners or architects; but a group of Unley residents who are passionate about protecting the unique historic character of Unley.

FOCUS holds the view that as Unley is an inner suburb of Adelaide, containing many fine examples of the State's built heritage and history in its older buildings, it is especially important to value and protect as much as possible of what makes Unley an attractive and interesting place to live. We believe that while the Unley council area faces pressure to provide areas of higher density housing along transport corridors to accommodate an

expanding population in South Australia, it is crucial that the development principles that apply in the Unley area reflect this.

The existing houses, many of which were built in the early days of settlement in South Australia or early in the 20<sup>th</sup> century and which were built to suit the climate, the tree lined streets and proximity of local services all contribute to the community spirit that exists in Unley and to the desirability of Unley as a place to live. It is a well known fact that these factors have a positive effect on people's general health and well being.

While FOCUS would prefer to see stronger demolition control to protect the older building stock and streetscapes, we acknowledge and **appreciate the efforts made by the Unley City Council to achieve greater protection in this regard. We acknowledge that some pressure has been brought to bear and compromise has been necessary, given that the State Government's Minister of Planning ultimately holds the power over decisions affecting Unley and other local council areas.**

FOCUS strongly supports the preservation of an environment that encourages community capital, walking and cycling to local activities, convenient access to health and welfare services, parks and public recreation areas. However, FOCUS is concerned by the prospect of loss of open space which is likely to occur with increased urban infill, as well as the inevitable increasing pressure on traffic levels and services.

FOCUS supports the aim of the Village Living and Desirable Neighbourhood DPA Stage 1 and holds the view that this document provides an excellent record and overview of the much valued "built" history of the City of Unley and urge that this be made readily accessible through the Council to Unley residents.

While supporting the DPA Stage 1 and the Council's achievements to date in the development of this plan, FOCUS trusts that in the development of Stage 2 of the DPA, the Council will be equally consistent in assigning contributory/heritage/character zones in the remaining areas of Unley (ie those not protected in Stage 1).

While recognising the pressures to enable high density development along transport corridors in line with State Government policy, FOCUS also has been advised of the concerns of some local residents about the detrimental impact Stage 3 may have on residential areas adjacent to the main road and corridor centres, an example of which is the recently announced proposed multi-storey development on Goodwood Road at Wayville.

FOCUS strongly agrees with the section in Appendix F of the Unley City Draft Development Plan Amendment that proposes,

"Homes within the Historic Conservation Zones in maps 13 to 19:

- (a) not be demolished, other than in the most extreme circumstances in respect to Local Heritage Places and in any case unless
  - (1) the place or any designated significant element is so unsound as to be unsafe and irredeemable; and
  - (2) the extremely poor state of the structure is supported by appropriate independent qualified expert engineering advice."

FOCUS strongly regrets that the State Government's Minister of Planning had this section edited out of the most recent draft of the DPA 1.

FOCUS also objects to the clauses in the DPA 1 which enable an applicant to demolish a contributory character building to use the subjective justification of an 'uneconomic' return on investment on the property in retaining a heritage place versus an 'economic' return from demolishing it. This provides an opportunity for developers/property owners to circumvent the protections which DPA 1 purports to provide for the retention of character and heritage buildings. This is particularly the case in the section, "Valued Items" (Attachment G Item 7) contributory items (Residential Historic Conservation Zone Item 7- Attachment G). FOCUS submits that in this situation, in effect, Council is forced into acting as an economic planning authority or arbiter. FOCUS strongly disagrees with Council having to make economic decisions on the expected investment levels for developers (or applicants motivated primarily by the profit motive and disregard for character and heritage). FOCUS proposes that these clauses be amended to provide clearer guidelines that prevent this clause being used as a loophole to allow demolition in the majority of cases.

**FOCUS strongly supports and urges that wherever possible, the modification of existing buildings be encouraged, as is done in most European cities, rather than demolishing and erecting a new buildings.**

**It is possible to provide higher density living and more residential space, without demolishing character buildings or altering the City's character streetscapes.**

FOCUS strongly urges a targeted approach to redevelopment as consistent with the UNLEY URBAN MORPHOLOGY STUDY 2005 which found:

- "8,084 sites within the City of Unley are of "historic/character value: and 2,429 sites are of "non-contributory and detracting value";
- targeted redevelopment of non-contributory and detracting forms of houses could yield 1,300 additional sites for new infill dwellings.(enough to cater for the current growth rates for the next 20 years);
- the refocus of new dwelling commencements to these areas and sites, and a corresponding restriction of the demolition of historic/character building stock would be a desirable objective to manage the desired future character for the City of Unley."

According to the Draft DPA 1 Capital Investment 4.6.1, in 2007/2008, \$36.5 M was spent on alterations and additions to buildings in Unley. This is a significant investment and underpins the social and historical connection Unley residents have with their built environment.

At a time when climate change is a matter causing great concern in the broader community, FOCUS believes that in demolition and development applications, consideration should be given to the embedded value of the energy used to demolish an existing built form, and the energy and natural resource costs to replace it with a new development. Progressive demolition of character homes at a rate of (49-59) say 55 per annum is likely to result in a capital loss of \$22 M.

*“The energy needed to build your average 19<sup>th</sup> century terraced house could drive a car five times around the planet. That is the energy used to extract the raw materials, process them into bricks and mortar and build with them. To throw this “embodied energy” away by demolishing a house and then expend even more energy building something new is simply not sustainable”*

Robert Bevan, Australian Financial Review 15-17 August 2008.

**FOCUS urges changes to the DPA Stage 1 so that the issues of climate change, carbon emission taxes and sustainability are taken into account in planning and the assessment of development applications.**

**FOCUS strongly agrees with the DPA Stage 1 Performance Criteria Supported Accommodation 125. Clear criteria and the enforcement of these should prevent the issues such as those Unley has experienced in 2008 in relation to proposed multi-storey high density retirement villages or complexes.**

Thank you for the opportunity to study the DPA Stage 1 and to make a formal submission.

FOCUS wishes to be heard at the Public Hearing.

Yours faithfully

Ros Islip .  
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