Greater Adelaide Regional Plan Discussion Paper

Community groups, industry associations and non-government organisations submissions

STATE PLANNING COMMISSION

Government of South Australia
Department for Trade and Investment

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 3:39 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Adelaide-Fringe-feedback-on-GARP-23-_1.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Other
Given name:	Jo
Family name:	O'Callaghan
Organisation:	Adelaide Fringe
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Adelaide Fringe is a world-renowned, annual arts festival that celebrates culture, place and artists from across the globe. With more than 60 years of heritage, Fringe's innovative and inclusive approach as an open-access arts festival has made it a hub for emerging talent, as well as a destination for established artists from around the world. The Adelaide Fringe has a huge cultural impact on the state of South Australia. It celebrates diversity and encourages social cohesion through cultural exchange, bringing people together and providing a platform for artists to share their unique perspectives with a global audience. 1 in 2 South Australians are estimated to have attended a Fringe event in 2023, with 4.5 million attendances across the Festival. See full response in attachment.
Attachment 1:	Adelaide-Fringe-feedback-on-GARP-23-_1.pdf, type application/pdf, 586.7 KB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001

Monday November 6th 2023

RE: Feedback on the Discussion Paper for Greater Adelaide Regional Plan

Adelaide Fringe is a world-renowned, annual arts festival that celebrates culture, place and artists from across the globe. With more than 60 years of heritage, Fringe's innovative and inclusive approach as an open-access arts festival has made it a hub for emerging talent, as well as a destination for established artists from around the world. The Adelaide Fringe has a huge cultural impact on the state of South Australia. It celebrates diversity and encourages social cohesion through cultural exchange, bringing people together and providing a platform for artists to share their unique perspectives with a global audience. 1 in 2 South Australians are estimated to have attended a Fringe event in 2023, with 4.5 million attendances across the Festival.

There are many elements of the *Greater Adelaide Regional Plan Discussion Paper* that we support, and we see population growth is an exciting opportunity for Adelaide's future. We are specifically interested in how major events, activations and arts and culture are factored into the plan's place making strategies. We recommend including spaces within public infrastructure for arts and cultural activities as part of this plan, especially around new infill zones, urban activity centres and neighbourhood regeneration projects. It is also essential to consider how urban design interacts with temporary events within communities.

Some key considerations in response to the paper are;

- Aboriginal and Torres Strait Islander leadership within the plans development and implementation is essential, especially in recognition of the connection to cultural heritage and country.
- We would like to highlight the ongoing need for flexible environments where road closures and activations in green space are regular and welcomed occurrences, and where communities are built to expand and contract in this way.
- Consider mandating minimum requirements of allocated space for cultural activities within developments. Noting that these spaces need support not just in infrastructure but ongoing maintenance and activation budgets. For example, the Marion Cultural Centre is an excellent example of a council led initiative within an urban corridor that thrives. It hosts one of the largest metro Fringe programs annually and sees great visitation to its library, gallery space and theatre. Local government is best placed to administer these ongoing activities as they know the needs and values of the local community they serve. State Government and commercial investment should fund local government to have arts and cultural initiatives such as this one.

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- Many examples exist across Australia mandating a 1% spend on public art in any new developments over $2million. How could a similar requirement be implemented not only on public art but also the activation of theatres, galleries and live music hubs such as Marion Cultural Centre especially in strategic infill areas, and corridors.
- Supporting spaces that already exist to continue when regenerating neighbourhoods is essential, the displacement and subsequent closure of arts and cultural spaces such as the Bakehouse Theatre operating for decades in the CBD until last year, and Rumpus in Bowden, operating from a couple of years in the newly developed precinct has had a significant impact on community and our festival offering. We can't let the market dictate what the development of arts and cultural spaces look like, as often these spaces are not commercially viable. It is important to acknowledge that these spaces improve quality of life, creating community connections, reducing isolation and have a big impact on health and wellbeing in the community. Developments need to make it easier for operators to run arts and cultural spaces, and the easiest way to do this would be to implement free or highly subsidised rental spaces within community – the business models of many creative spaces can't be measured on commercial success and often these operators can't afford to pay commercial rent. A requirement or of subsidy for (similar to how we regulate green space) within a community is needed.
- The role that major events, arts and culture play in the creation of jobs should be considered, especially when looking to create jobs locally in the living local strategy. Adelaide Fringe in 2023 delivered 10,000 direct and indirect jobs to South Australia, and we play a significant role in creating employment opportunities.

In summary, significant planning needs to be made into facilities and infrastructure for major events, and community activities within the planning for new housing developments, regenerated neighbourhoods, and urban activity centres.

From: [redacted]
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 8:06:40 AM
Attachments: Outlook-vmssyb1v.jpg
GARP Discussion Paper - Joint Submission Active Living Coalition Heart Foundation Walking SA Bike SA Bike ADL - 6 November 2023.pdf

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> You don't often get email from [redacted] Learn why this is important

Hello

Please find attached a submission prepared jointly by the ALC, Heart Foundation, Walking SA, Bicycle SA and Bike ADL.

Regards

David Bailey
Senior Project Officer

[redacted]
ALC web communityplaceplanning.com/active-living
ALC linkedin.com/groups/14040027/
[redacted]

6 November 2023

Attention: Growth Management Team
Planning and Land Use Services
Department for Trade and Investment

Via plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan Discussion Paper

We write to express shared comments about the Greater Adelaide Regional Plan Discussion Paper (hereafter referred to as Paper).

We acknowledge the opportunity to comment on the early ideas in the Discussion Paper and are open to discussing these points further.

We look forward to the draft Greater Adelaide Regional Plan (GARP) consultation in 2024.

Key Points

Support 'Live Local' - We share interests in fostering change in existing and new suburbs that leads to the wellbeing, environmental and economic benefits of active lifestyles through more walking, cycling, recreation, and public transport use.

Achieving 'Live Local' takes an integrated 'whole of government approach' to planning for land use, infrastructure and budgeting (in particular walking, cycling and public transport).

We favour growth types more likely to lead to active and healthy lifestyles.

- **support proposed strategic infill and corridor growth**
- **open to proposed urban activity centres and neighbourhood regeneration** subject to detailed master planning and infrastructure provision
- However, acknowledging fringe growth will be more car reliant and less active than inner, **further greenfield and satellite city growth should only be contemplated where detailed planning and infrastructure agreements covering active, public and community transport, strongly align with health and active design standards.**

We in principle **support the GARP having active living targets**.

We request:

- The proposed housing/jobs growth be analysed regarding the Eight Urban and Transport Planning and Design Features (known as the 8Ds).
- A review of the terminology and the consideration of other "spines" that aren't vehicle based such as public transport stops, the MOSS system, the River Torrens Linear Park and the metropolitan coastline.
- The GARP contain standards for proximity to open space, public transport, schools, and services.
- The GARP include a specific action that spatial analysis using these standards occurs to inform master planning for regenerating suburbs and for new growth. This analysis should inform subsequent Code Amendments.
- The Commission review the active data sources (Attachment B to this submission) to inform active targets.
- The GARP contain a target about be land rezoned for housing fully meeting these standards.
- More innovative policies and housing models should be explored.
- More consideration of local/sub regional planning be built into is our system to assist operationalise the high level strategies in GARP.
- Greater clarity about how DIT's strategies – such as cycling, public transport and road safety - are aligned with GARP. This should illustrate a 'whole of government' approach.
- GARP seek active transport plans as part of planning approvals for schools
- The Commission work with Wellbeing SA on a business case for an active health spatial digital tool.

Integrated Planning for Land Use, Infrastructure and Transport is Essential for Living Locally

We share interests in fostering change in existing and new suburbs that leads to the wellbeing, environmental and economic benefits of active lifestyles through more walking, cycling, recreation, and public transport use. These are acknowledged by 'Live Local' in the Discussion Paper which we support.

The release of the Paper coincided with release of benchmarking analysis[1] which shows Greater Adelaide has been tracking backwards in achieving liveability outcomes. Nick Reade RAA CEO states 'when it comes to transport and infrastructure this report validates much of what we already know – that Adelaide is falling behind where it needs to be. We need to make public transport more efficient and attractive to commuters, we need to invest in cycling infrastructure and transition all transport to zero emissions.'

Drawing similar conclusions, the 2022 global benchmarking[2] using WHO criteria identified that significant more work needs to be done to achieve a healthy and liveable Greater Adelaide. A forum[3] discussing the WHO based findings concluded:

[1] 2023 Benchmarking Adelaide Report - Committee For Adelaide
[2] thelancet.com/series/urban-design-2022
[3] See Liveability Index Launch September 2022 Active Living | Community Place Planning

'… defining 'liveability' more clearly and adopting related targets to track and monitor progress is critical. The 30 Year Plan for Greater Adelaide does this to some extent; however, it needs to be updated, with more ambitious targets and developed as a whole of government plan, not just seen as belonging to planning agencies.'

Noting integrated approaches occurring elsewhere[4], the lack of integrated planning and delivery across the whole of government is holding back healthy and liveable outcomes in Greater Adelaide.

Achieving 'Live Local' takes an integrated 'whole of government approach' to planning for land use, infrastructure and budgeting (in particular walking, cycling and public transport).

Delightful Density Done Well

Active lifestyles and associated wellbeing outcomes vary from inner to outer areas with their differing density and infrastructure. Analysis of proposed growth types and healthy active outcomes (**Attachment A**) affirms that density done well offers healthier lifestyles. We know that every 1000 South Australians who is active 150 minutes/week saves the State Health budget $3M/annum ongoing[5].

We acknowledge the intent to plan ahead for land supply to ensure options for housing and employment that is affordable.

We acknowledge budget is a critical consideration for the SA Government in its role as direct infrastructure provider for schools, health, emergency services, public transport, main roads, and in working with public and private entities – including part funding - walking and cycling infrastructure, community transport, water, sewer, and energy. We acknowledge the coordination and funding of infrastructure is complex and a challenge.

We favour growth types more likely to lead to active and healthy lifestyles.

We in principle support the proposed strategic infill and corridor growth, and subject to detailed master planning and infrastructure provision, we are open to proposed urban activity centres and neighbourhood regeneration.

However, acknowledging fringe growth will be more car reliant and less active than inner, further greenfield and satellite city growth should only be contemplated where detailed planning and infrastructure agreements covering active, public and community transport, strongly align with health and active design standards. Ensuring an outcome of networks connecting existing/new growth and between dispersed towns is important.

Active Targets

State Planning Policy 1.11 states 'Include performance targets in regional plans for the creation of walkable neighbourhoods and increasing the number of dwellings close to public transport.'

The current 30 Year Plan for Greater Adelaide contains targets on 'Getting Active' and 'Walkable Neighbourhoods'.

[4] Home | Shaping SEQ Update (statedevelopment.qld.gov.au)
[5] Extrapolated from Active-Lives-2021-Infographic.pdf (orsr.sa.gov.au)

The importance of targets was affirmed by Recommendation 5 of the 2023 Report of the Select Committee on Public And Active Transport:

'… recommends that state government should review and develop:

a) targets for increasing patronage of active travel, and action or implementation plans to ensure those targets are met:

b) regular monitoring and reporting on targets for increasing patronage of active travel; and

c) specific strategies focussed on safety of cyclists and pedestrians.'

Noting the forum discussing the WHO based findings affirmed the importance of targets to track and monitor progress, we support the GARP having active living targets.

As part of an Active Living and Neighbourhood Density Forum in 2023[6], Commission Member Stephanie Johnston requested assistance about data to assist inform active targets. This request has prompted our organisations to begin to collate data sources (**Attachment B)**. It might be that using several data sources offers a finer grained indicator of progress.

We request the GARP contain standards for proximity to open space, public transport, schools, and services. The current 30 Year Plan contains healthy neighbourhood standards **(Attachment C**). These standards generally align with the Heart Foundations leading Healthy Active by Design[7] guidelines, and also generally align with the Eight Urban and Transport Planning and Design Features[8] (known as 8Ds) (Figure 3).

	Urban and transport planning and design features	Examples
Regional planning		
Destination accessibility	Regional employment, facilities, and services conveniently accessible by public transport; destinations for daily living available locally	Jobs, facilities, and services within 30 min travel from home by public transport; daily living destinations within walking distance
Distribution of employment	An appropriate mix of employment available across a region	A job–housing balance from 0·8 to 1·2
Demand management	Parking supply and pricing policies increase the attractiveness of using alternative travel modes to driving	Building codes and other government policies that minimise car parking
Local urban design		
Design	Urban design creates walkable catchments around activity centres and incorporates accessible public open space; street networks minimise distances between homes and daily living destinations, reduce traffic exposure, and create safe pedestrian, cycling, and public transport networks; lot* layouts designed to increase residential densities and promote natural surveillance	High street connectivity including ped-sheds ≥0·6 within 0·8–1·2 km (ie, 1–15 min walk) of activity centres, transport hubs, and schools; separated pedestrian and cycle paths; local public open space provided; housing overlooks streets and public open spaces
Density	Residential densities sufficient to support the viability of local business and high-frequency public transport services	Multiunit housing built around activity centres with shops, services, and transport hubs
Distance to public transport	High-frequency public transport located within short walking distances from homes	Bus stops accessible ≤400 m; rail stops accessible ≤800 m from homes
Diversity	Residential areas built with different types of housing mixed with commercial, public, and recreational opportunities	Different types of housing available near, around, and on top of shops and services required for daily living
Desirability	Neighbourhoods designed to be safe, attractive, and accessible; public transport that is convenient, affordable, frequent, safe, and comfortable	Crime prevention design principles incorporated into residential and commercial developments; urban greening strategies implemented; traffic minimised, calmed, and separated from pedestrians and cyclists, particularly near schools

*Also known as plots in some countries, including those in the UK.

Table 1: **Urban and transport planning and design interventions and features required to create compact cities that enhance health and wellbeing**

Figure 1 Active and Health Lifestyles are Outcomes of Eight Urban and Transport Planning and Design Features

[6] See Active Living and Neighbourhood Density Forum Active Living | Community Place Planning

[7] Home (healthyactivebydesign.com.au)

[8] thelancet.com/pdfs/journals/lancet/PIIS0140-6736(16)30066-6.pdf

The challenge is in ensuring spatially these standards are operationalised in regenerating existing suburbs and in new growth areas.

We request the GARP include a specific action that spatial analysis using these standards occurs to inform master planning for regenerating suburbs and for new growth. This analysis should inform subsequent Code Amendments.

Noting the GARP is about the planning system, we propose a measure be the proportion of land rezoned for housing that fully meets these standards. This is not to say rezoning some land for housing that does not meet the metric should not occur, rather that it be minimised, and we have explicit measure to track rezoning meeting these standards.

The Greater Adelaide Regional Plan is statutorily obliged to work towards achieving the State Planning Policies. The State Planning Policies contain many policies with an 'active' focus (**Attachment D**).

It is unclear how well the proposed growth for Greater Adelaide as a whole aligns with key State Planning policies such as:

'5.1 Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.

1.9 Plan neighbourhoods to support walking and cycling, particularly in Greater Adelaide and regional townships.

1.8 Mixed-use development around activity centres, public transport nodes and strategic transit corridors to encourage greater use of active transport options such as walking, cycling and public transport.'

We request the proposed housing/jobs growth in the GARP be analysed regarding the regional planning design features in the Eight Urban and Transport Planning and Design Features (known as the 8Ds).

<u>Various</u>

The language used around spine driven development is mis leading. We request a review of the terminology and the consideration of other "spines" that aren't vehicle based such as public transport stops, the MOSS system, the River Torrens Linear Park and the metropolitan coastline.

Acknowledging the trend in more single person households, we feel more innovative policies and housing models should be explored to support this.

During the 1990's more fine grain regional plans were commissioned by adjoining local governments that provided more localised planning policy and urban design thinking. This local/sub regional level of planning is currently missing in our system and could assist in better detailing the high level ideas / strategies in GARP.

Detail is lacking on public and community transport in the Discussion Paper.

It is not clear how some of DIT's strategies align with GARP, such as cycling, public transport and road safety.

School transport plans as part of planning approvals for schools noted as a good idea from NSW that GARP should have a strategy on. Schools are congested at peak times, with a variety of safety challenges.

Active Healthy Spatial Digital Tool

The SA Property and Planning Atlas[9] and Location SA[10] online tools provide a wealth of digital data about land, property, urban and regional planning policy, and a range of infrastructure.

There appears to be a gap of spatial digital datasets that inform active healthy planning by planning agencies as well as potential use by other entities, such as for marketing the opportunities for use by community members.

For example:

- Wellbeing SA commissioned University SA to study the barriers to use of adult exercise equipment in parks. The first question was where are they? We know this equipment is valuable for active lifestyles.
- The Dog and Cat Management Board ask Councils to nominate which parks are dog on leash and off-leash. We know about the value of companion animals for social benefits. Imagine a digital tool mapping where these are
- We know parks of 1.6HA play a more important role for being active, with a greater range of facilities, e.g. courts, basketball, playgrounds toilets. Imagine a digital tool showing where these are, and where the gaps are to inform open space planning?
- Data about cycling networks and public transport stops would be valuable

For the Commission and planning entities, a digital tool with capability to map and analyse the metrics for proximity (see earlier Figure 2) would be invaluable to inform regional and local plans, Code Amendments.

The overlap with wellbeing data through Wellbeing SA is acknowledged, and Wellbeing SA is likely an important partner in considering the scope and functionality around a digital tool.

We request the Commission work with Wellbeing SA to investigate the business case for preparing an active health spatial digital tool.

Future Collaboration

We request the Commission work with active living entities and professional bodies on integrating resources, such as Healthy Active By Design, into the Draft GARP, and statutory tools, possibly the Practice Direction for Code Amendments, that elevate professional competence in planning and delivering active and healthy neighbourhoods and communities.

[9] SAPPA the South Australian Property and Planning Atlas
[10] Location SA Viewer

Our respective organisations look forward to participating in the engagement on the draft GARP in 2024.

We would be pleased to meet with PLUS or the Commission to discuss this submission. Please contact Heath Edwards in the first instance.

Yours sincerely

[redacted]

Heath Edwards MPIA FAILA
Chair
SA Active Living Coalition

[redacted]

Dr Marie Ludlow
General Manager SA
Heart Foundation

[redacted]

Sharon Kelsey
Executive Director
Walking SA

[redacted]

Brett Gillett
Chief Executive Officer
Bicycle SA

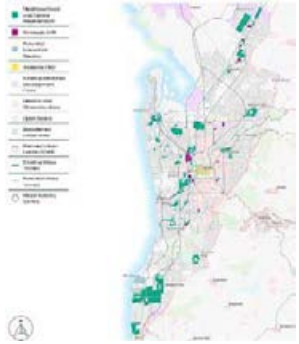
[redacted]

David Elliot
Chair
Bike Adelaide

Copy to:

- Stephanie Johnston, Member State Planning Commission
- Transport Action Network

Attachment A Growth Types and Healthy Active Outcomes

Possible Growth	Strategic Infill and corridor growth	Urban activity centres & neighbourhood regeneration	Greenfield and Satellite City	Employment Lands
				
Infrastructure Services Cost	Low	Medium	High	
Active Outcomes for Communities	High E.g. in Bowden, many residents walk, cycle and use public transport. No household has two cars, and many have no cars. An example of integrated land use and infrastructure, a model anticipated for strategic infill, such as Keswick & Hindmarsh	Medium Detailed analysis to inform local interventions to foster active lifestyles will be important. Detailed network analysis should apply	Low As an example, outer north suburban growth is known for growth in three car ownership	
Health Budget Benefit - 1,000 residents active/week save State Health Budget $3M/Annum ongoing	High	Medium	Low	

Attachment B

SA Active Transport Data Options Paper – October 2023

Paper owner – SA Active Living Coalition. Input from coalition members

Purpose is to collate a snapshot of what data exists about active transport in SA. Motivated initially by request from Stephanie Johnson of State Planning Commission for assistance in data sources to inform active related targets associated with Greater Adelaide Regional planning. Also motivated as we want to understand how walking, cycling, public transport and micro-mobility are increasing over time. This type of data is also important to inform measuring of how effective integration of land use, infrastructure and public transport services are.

Data Source	Where Found? Eg web link	Pros	Questions
CWANZ annual survey on walking and cycling	cwanz.com.au/national-walking-and-cycling-participation-survey-2023/ (DIT are the lead SA agency)	Helpful for national comparisons but the SA data sets are limited by funding provided by SA	Limited SA data
ABS Journey to Work	abs.gov.au/census/find-census-data/search-by-area		Only journey to work. Walking and cycling are not included in counts for 2 or more modes – therefore under-reporting of these modes
Bike ADL Super Tuesday annual cordon counts	bikeadelaide.org.au/super-tuesday-cyclist-count/super-tuesday-cyclist-count-2022/	Annual – includes all bike riders (not only journey to work). Cyclists generally to CBD, ad hoc inclusion of walking (depends on the person doing the count and how busy the intersection is for bike riders) One indicator	
Bicycle Network	bicyclenetwork.com.au/our-services/transport-surveys-and-data/super-counts/		Local governments and organisations have to pay to participate in the count

			– and only participants have access to the data.
Strava Metro Strava created Metro to aggregate data and make available for public authorities to use with a license. No privacy issues	Strava Metro Home	Ongoing based on digital walking, cycling, running. Data rich in graphs and maps. Can be done on a variety of spatial areas (Adelaide Plains Council used in Two Wells Walking Cycling Plan)	Representative of users would need validating when compared to results obtainable from a household travel survey.
DIT public transport boarding	Annual reports have patronage counts dit.sa.gov.au/about_us/governance_reporting/annual_report Adelaide Metrocard Validations - Dataset - data.sa.gov.au	Shows mode and fare type for all passengers Note: • Change in who was counted – from 2014/15 all free travellers (not just seniors) were included. • Change in 2016/17 to include all boardings (initial and transfer – not just initial)	Likely to miss people who do not validate cards/tickets. Public transport data only counts boardings it does not identify where people got off the vehicle. This means we really don't know much about where people are travelling to and from. Bus, train and tram drivers could provide their observations - but we don't have actual data (except presumably at Adelaide Railway Station). This means we don't really know much about the use of our public transport network - e.g. the number of people on the Gawler line that travel to Elizabeth, Salisbury and Mawson Lakes - not Adelaide. Or the people on the Seaford line that travel

			to Noarlunga and Seaford - not the CBD. Personal observations indicate that a lot of people travel between stations - we just don't know anything about who, why or how many. Might different reporting methods make for easier analysis
DIT automated counts	Gemma Kernich (DIT) should be able to advise on whether these are still in use. Unley Council is considering purchasing them.		DIT need to be asked to share active data counts Possible Uni SA study for DIT extrapolating other jurisdiction data to SA
Heart Foundation walking group data and personalised walking plans	Can submit a data request to HF Walking Program Manager	Some HF Walking Group data goes back to late 1990s Can access data for HW Walking Groups and Personal Walking Plan completions Data available at LGA and postcode level	
Risky Rides/Walks RAA	Risky Rides – Advocating for safe roads and paths for cyclists | RAA raa.com.au/riskywalks in 2023 to be done with Walking SA	Affirm key problems	
Pedestrians on Trails	Walking SA		Limited for broader analysis
Household travel surveys			Not done in SA for 24 years

Wellbeing SA Public Health Survey every two years	South Australian population health data • Wellbeing SA		
2021 DSPARC data Wellbeing SA			
Wellbeing SA Walking Metrics Study 2021			

Attachment C Current 30 Year Plan Health Neighbourhood Standards



Attachment D



Active Living in the State Planning Policies

2023

Active living is a way of life that integrates physical activity into everyday routines, such as walking to the shops, cycling to work, informal recreation or organised sport[11].

Active living brings together urban planners, landscape architects, transport planners, public health professionals, advocates, and other professionals to build neighbourhoods and communities that encourage active living and physical activity.

This document reviews active living in the State Planning Policies for South Australia[12].

SPP 1 Integrated Planning
1.8 Mixed-use development around activity centres, public transport nodes and strategic transit corridors to **encourage greater use of active transport options such as walking, cycling and public transport**. 1.9 Plan neighbourhoods to **support walking and cycling**, particularly in Greater Adelaide and regional townships. 1.11 Include performance targets in regional plans for the creation of **walkable neighbourhoods** and increasing the number of dwellings close to public transport.
SPP 2 Design Quality
2.2 Promote best practice in **access and inclusion** planning in the design of buildings and places by applying the principles of Universal Design, Crime Prevention Through Environmental Design and Access and Inclusion. 2.14 Provide public open space that accommodates a range of **passive, active and formal sporting** opportunities at the state, regional and/or local level.
SPP 4 Biodiversity
4.6 Encourage **nature-based tourism and recreation** that is compatible with, and at an appropriate scale for, conserving the natural values of that landscape.

[11] Adapted from en.wikipedia.org/wiki/Active_living

[12] State planning policies | PlanSA accessed 6 February 2023

SPP 5 Climate Change
5.1 Create carbon-efficient living environments through a more compact urban form that **supports active travel, walkability** and the use of public transport.
SPP 6 Housing Supply and Diversity
6.2 The timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and **walkable neighbourhoods**. 6.3 **Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.** 6.5 Locate higher density residential and mixed-use development in strategic centres and transport corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.
SPP 9 Employment Lands
9.11 Encourage the development of **integrated employment and residential mixed-use precincts** where conflicts between uses can be managed.
SPP 11 Strategic Transport Infrastructure
11.1 Facilitate an efficient, reliable and safe transport network that connects business to markets and people to places (i.e. where they live, work, visit and recreate). 11.2 Development that maximises the use of current and planned investment in transport infrastructure, corridors, nodes and services. 11.5 Encourage development that supports the increased use of a **wider variety of transport modes, including public transport, walking and cycling**, to facilitate a reduced reliance on private vehicle travel and promote beneficial community health outcomes. 11.9 Identify neighbourhoods, main streets and regional and town centres where **place is given greater priority** than vehicle movement by adopting a 'Link and Place' approach.
SPP 15 Natural Hazards
15.4 Mitigate the impact of extreme heat events by designing public spaces and developments to **create cooler microclimates** through the use of green infrastructure and water sensitive urban design.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 11:31 AM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: pdf-JULY-2023-AQUATIC-CENTRE-ALDINGA-BAY-ACTION-GROUP-DISCUSSION-PAPER-8.0-July-2023.pdf; pdf-FRAC-Council-land-at-Aldinga-.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	Tracey
Family name:	Atkinson
Organisation:	Aquatic Centre Aldinga Bay Action Group
Email address:	aquaticcentrealdinga@gmail.com
Phone number:	[redacted]
Comments:	The Greater Adelaide Plan would benefit from better forward planning of aquatic facilities, perhaps on a State basis, due to the current requirement that construction and management requires all three levels of government. The benefits of swimming pools are well established and have well established and costed health and social benefits for all ages and abilities. The issue of ageing existing aquatic facilities is widespread, with facilities requiring replacement after approximately 40 years. There is also an absence of planning for new facilities in growing areas (eg Aldinga) , and a reluctance of Councils to charge ratepayers to administer them, particularly when they cross Council boundaries. For example, it took 20 years of lobbying for Fleurieu Aquatic Centre at Victor Harbor to be built, and the cost of managing across two Councils is high. Aldinga residents have been asking for an aquatic facility for over 8 years, and a State funded Planning Study is now underway, with no commitment from government at any level to fund it or supply land . The current population numbers are there, and there is anticipated growth. Land is running out. Allocation of land at Aldinga (2.5 ha including green space) as part of the Aldinga Land Release and adjacent Council land would provide much needed space , before it is too late. Maybe we need a statutory body at State level to plan and manage this sector more efficiently than at present? The cost of managing aquatic facilities is an ongoing concern and out of the reach of some smaller Councils. I've attached a copy of the latest draft of our Discussion paper and more information can be found at our facebook page Aquatic Centre Aldinga Bay- Action Group. Also a pdf with the overlay of a layout demonstrating that a facility the size of the Fleurieu Aquatic Centre can fit combining Onkaparinga Council land with green space from the adjoining Renewal SA Aldinga land.
Attachment 1:	pdf-JULY-2023-AQUATIC-CENTRE-ALDINGA-BAY-ACTION-GROUP-DISCUSSION-PAPER-8.0-July-2023.pdf, type application/pdf, 373.0 KB
Attachment 2:	pdf-FRAC-Council-land-at-Aldinga-.pdf, type application/pdf, 979.8 KB
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

AQUATIC CENTRE ALDINGA BAY ACTION GROUP

Our goal: Aquatic facilities for all ages, all abilities.

Let's set aside land NOW.

You can follow our campaign on facebook **@Aquaticcentrealdingabay.**

We are: Residents, businesses, schools, sporting and community groups from Aldinga and the surrounding area that want an Aquatic Centre for our growing and ageing population.

Why here? Why now?

Aldinga has the new B-12 Payinthi College, the Aldinga Sports Park Master Plan, the Main South Road Duplication/Fleurieu Connections Project, and 45 hectares of Renewal SA residential land (800 new homes, between How and Main South Rd), with anticipated steady population growth at Sellicks Beach and along the Main South Road corridor[1].

The focus on organised sport, beaches, recreation trails, cycling and local parks in the area is welcome. However swimming and indoor facilities, particularly for younger children, youth, and older and less mobile residents are missing.

Considerable time and cost is involved transporting children to and from distant swimming pools. And too many children complete primary school unable to swim 50 metres[2]. Why is there no pool adjacent to our many local schools?

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[1] Renewal SA <https://renewalsa.sa.gov.au/news/large-scale-aldinga-landholding-heads-back-to-market/>, retrieved 14th May 2023

[2]Royal Life Saving Society, 2017, Benchmarking.

Existing public aquatic facilities are not accessible or good enough

Research indicates that travel times for optimal attendance at fitness activities are less than 6 kms or 10 minutes by car[3].

No aquatic facilities are within 10 minutes of Aldinga. It is even further for hydrotherapy:

Aquatic centres[4]:

Where	Council	Distance from Aldinga	Comments
Noarlunga Centre	Onkaparinga	20kms (20 mins)	Indoor
SA Aquatic Marion	City of Marion	36kms (31 mins)	Indoor
Fleurieu Aquatic	Alexandrina & City of Victor Hbr	42 kms (33 mins)	Indoor, hydrotherapy
Seaford	Private	12 kms (14 mins)	Indoor
Strathalbyn	Alexandrina	49kms (49 mins)	Outdoor, seasonal

Existing population is enough to support an aquatic centre now

The City of Onkaparinga Council area population is 175, 711, an increase of 9000 since 2016[5].

*Our population is growing and ageing and includes y*oung families, youth, active older adults, and people with disabilities and rehabilitation needs.

Over 20,000 residents live within 10 minutes of Aldinga (Aldinga/Pt Willunga, Aldinga Beach, Sellicks, Maslin Beach) and another 20,000 residents live within 15 minutes of Aldinga (McLaren Vale, McLaren Flat, Moana, Seaford Rise-Heights, Myponga, Mt Compass).[6]

[3] Fleurieu Aquatic Centre Business Case page 24

[4] Google maps, distance from Aldinga.

[5] City of Onkaparinga profile.id.com.au 2022, ABS Census 2016, 2021.

[6] profile.id.com.au 'About the profile areas', ABS data 2021, accessed 28-30 July 2022.

Within 10 minutes:

Suburb	Census 2016	Census 2021
Aldinga/Pt. [illegible]	2,212	2338
Aldinga Beach	10,558	11,116
Sellicks	2,614	2,849
Willunga &c	3,487	3788
Maslin Beach	1,151	1325
Total	20,022	21416

These projections are in excess of the 20,000-population base required as a minimum for sustaining an aquatic centre[7].

There is also considerable tourism and non-resident visitor potential. For example 30 minutes further south are Normanville, Carrickalinga, and Yankallilla, adding 3240 people who commute along Main South Road past Aldinga. **Potential catchment: over 40,000 residents.**

Benefits of aquatic activities

The benefits of swimming and water-based activities are well established and are in the *top three of physical activities* preferred by Australians [8]:

An aquatic centre can incorporate:

- Learn to swim-all ages and abilities, incl. new migrants
- Life saving skills training
- Lap swimming for fitness and competition
- Water based sports e.g. water hockey, volleyball
- Aqua aerobics and other supported fitness and exercise
- Maintaining fitness and mobility for older adults and people with disabilities
- Hydrotherapy and rehabilitation
- Mental health and wellbeing
- Weight management
- Gym, sauna spa, creche, cafe, retail
- Social interaction and fun!

[7] Fleurieu Aquatic Centre Business Case, 2013

[8] Sportaus.gov.au

The City of Adelaide aquatic centre needs analysis identified $4.5 million in annual savings in health and wellbeing from their proposed aquatic centre[9].

Fleurieu Regional Aquatic Centre (FRAC) identified $3.8 million in Social Value in 2020-2021[10].

Benefits outweigh the running costs

Conservatively, an aquatic centre could deliver over $3 Million per year in health, well-being, and social value, and would cost Onkaparinga Council residents less than $10 per rateable property per year to run [11]. This is less than $4 per resident per year. If we are to consider the potential catchment of 40,000 within 15 minutes of Aldinga, there are approximately 16,700 households with 2.4 persons per household that would benefit[12].

While we have beautiful beaches, they do not serve the same purpose as a swimming pool. Weather, dangerous water conditions, high UV levels, and poor accessibility are some limitations.

Swimming ability is essential for confidence in the sea. Access to swimming classes is vital for children to learn to swim.There were 112 Summer Drowning Deaths in 2021-2022, a 30% increase on 2020/2021[13].

What do we want? Fleurieu Regional Aquatic Centre?

Fleurieu Regional Aquatic Centre (FRAC) is an excellent facility, opened in 2017 at a cost of $21 million. Funding sources included Federal Government ($7.5 million), and State Government ($500,000), with 2.5 hectares donated by the Wright Family (Beyond Today), Real Estate Developers.

FRAC is situated in Hayborough, on the outskirts of Victor Harbor. It features a 25 metre indoor pool, hydrotherapy/rehabilitation pool, gym, café, leisure/ children's pool, outdoor splash park, all set in landscaped grounds, with parking. The combination of facilities provides a revenue stream, jointly managed by two Councils and run by the YMCA. *Over 50 people are employed at FRAC!*

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[9] Warren Green Consulting, 2019

[10] Fleurieu Aquatic Statutory Authority Annual Report 2020-2021.City of Victor Harbor.

[11] Mayor Erin Thompson, Press Release, Onkaparinga Council 2019; profile.id.com.au 2022.

[12] City of Onkaparinga Household type <https://profile.id.com.au/onkaparinga/households>, retrieved 14 May 2023.

[13] Royal Life Saving Summer Drowning Report 2021/22 Snapshot www.royallifesaving.com.au/__data/assets/pdf_file/0008/62486/RLS_SummerDrowningTollReport2022.pdf

Detailed background information, business case, annual report 2021, and ongoing financial reports are available online (FRAC Authority). The facility currently runs with a deficit of approx. $700k per annum[14]. With greater attention to energy efficient systems these costs could be less[15].

Other aquatic projects in SA. Why not here?

One recent example is 'The ARC' Campbelltown, completed by Sarah Constructions for Campbelltown Council in 2016, after 8 years of unsuccessful grant applications to State and Federal governments. Council land was essential.

Many Councils in SA have recently received funding from State and Federal government to upgrade or build new aquatic centres. For a Summary please see Table 1. 'Aquatic projects in SA 2022-3' on page 13. Planning and construction are underway!

Land is the first step. Why not here? Aquatic centres are Council responsibility and our Council is the largest. Our current facilities are over 30 years old and insufficient for current needs and growth. Where is the land and the succession planning?

In conclusion

Aldinga Bay is a growth area with new developments of housing, school, sporting and road infrastructure. However there is limited access to and availability of aquatic facilities within reasonable travel time.

Our campaign has obtained considerable support for a facility, something for all ages and abilities. There is a need for government to allocate land before it is too late and to work at all levels towards making an aquatic centre a reality.

The costs of managing such a facility are comparatively modest and far outweighed by the returns in social, health, and wellbeing for our community.

The value of aquatic centres is evidenced by the many projects underway elsewhere in SA, and the replacement of ageing pools with sustainable, energy efficient and accessible facilities. **Why not here?**

[14] See Sources List

[15] Heidenreich, Emma .Fleurieu Sun July6 2023

Campaign history and progress

We began our campaign in **August 2021** with radio print, and social media. Happy 2nd Birthday to us!

In **November 2021** Member for Mawson Leon Bignell pledged $150,000 for a Planning Study, since allocated in the 2022-23 State Budget.

We collated letters of support from schools, sporting bodies, community groups, and elected representatives, in anticipation of a future deputation to Council.

In **January 2022** we submitted to Onkaparinga Council, via outgoing Councillor Richard Peat, a block plan of FRAC and a block design prepared by Sarah Constructions to demonstrate a fit with Area 23 of the Aldinga Sports Park Master Plan. Council indicated that there is potentially sufficient land there for an aquatic centre and parking. Images on our facebook page.

We obtained over 1300 local signatures on a petition tabled in Parliament by MP Leon Bignell in **November 2022**. The petition requested that all levels of government work together for our aquatic centre. A Federal petition is an option, supported by Mayo MP Rebekha Sharkie.

In **June 2022** an extension of the future rail corridor to Aldinga Beach was announced, and more recently the Renewal SA Development adjacent the Aldinga Sports Park was re-advertised for sale. If some of this land is available it would enable a larger footprint and larger pools(s) and green space to be considered. The developer tender for the Renewal SA Land closed on **22 June 2023.**

The Main South Road Duplication Project Stage 2 may also impact availability of Aldinga land. Our group wrote to the Minister for Transport in **January 2023** regarding our concerns.

In 2022 our group developed guiding principles and tender assessment criteria for the Planning Study with David Nash, Manager, Recreation and Sport Planning, Office of Recreation Sport and Racing (ORSR).

The successful tender for the Planning Study was awarded in **May 2023** to InsideEDGE Sport and Leisure Planning who are leading the team of consultants now developing a master plan and business case. The study will take approximately 6 months and is project managed by the ORSR[16].

[16] Inside Edge Sport and Leisure Planning www IESLP.com.au

We continue to update the community in the Fleurieu Sun, Coastal Views, and on local radio Tribe FM 91.1.[17]

We now have 800 followers on facebook and instagram.

Please join and support us by 'liking' our facebook and instagram pages and participating in public consultation and stakeholder engagement during the planning study.

For more information or to get involved please contact:

Tracey Atkinson	**Karen Lever**	**Anne Cross**
Aldinga Beach	**Sellicks Beach**	**Port Willunga**
[redacted]		

Facebook: **Aquatic Centre Aldinga Bay-Action Group**
Instagram: **AquaticCentre_AldingaBay**

Email: **aquaticcentrealdinga@gmail.com**

[17] Wyman, Tom, Fleurieu Sun 6 July 2023

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Table 1: Aquatic projects in SA 2022-2023

Where	What	Land	Council	State	Fed	Total
Fleurieu Regional Aquatic, Victor Hbr	25m indoor pool, gym, children's pool, splash n play, hydrotherapy, café, retail crèche , etc. YMCA	Land donated by developer 2.5 ha	Victor Hbr & Alexandrina (& Strath outdoor pool)	$0.5M	$7.5 M	$21 M Opened 2017 Goal is self sufficiency Costs $700k to run
Noarlunga Aquatic & Rec Centre	Opened 1991. Upgraded change rooms 2022	Council	$0.3M	?	?	$0.3M reno Costs $300k to run
Mt Barker	3 Pools, incl. 25 m indoor, hydrotherapy pool, 50 m outdoor, stadium, wellness & lifestyle centre, café, retail	Mt Barker District Council land, adj. Sports & Rec Park. Replaces Mountain Pool	Balance$?	$7M	$15M so far	$30M for Stage 1-like Fleurieu Aquatic. Complete Oct 2024
Murray Bridge	Existing 50m pool renovation. New 25m indoor pool, gym, hydro, spa etc.	Existing land & pool	Rural City of Murray Bridge	$1 M	?	Stage 1 $2.8M of 5 Stages Total $32 M
Salisbury	new 50m outdoor pool, 25m indoor, warm water pool, play, gym, cafe, slides.	Existing land & replace 50 yr old pool	Salisbury $21.215M	State $7.185 M		$29.9M complete mid 2024


FRAC Overlay with
ASP Masterplan
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DTI:PlanSA Submissions

From: DTI:Plan SA
Sent: Monday, 6 November 2023 4:55 PM
To: DTI:PlanSA Submissions
Subject: FW: Greater Adelaide Regional Plan Discussion Paper feedback form
Attachments: AICSA Submission GARP 23.pdf

OFFICIAL

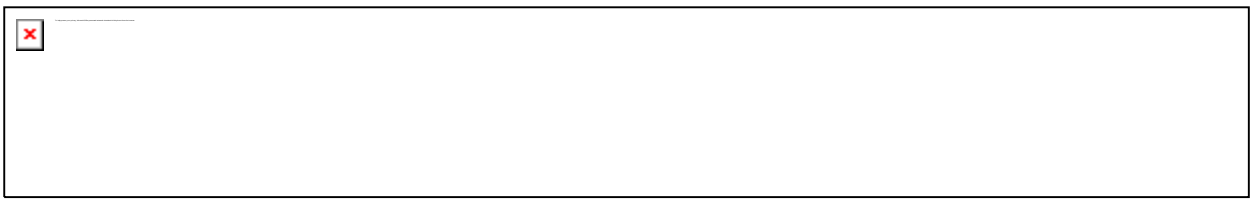
Hi Team,

Just forwarding the below email as it has come to the PlanSA inbox

Reference Number: 77027

Kind Regards,

Vu | Customer Support Officer
Planning & Land Use Services | Department for Trade and Investment
E PlanSA@sa.gov.au |W plan.sa.gov.au



From: AICSA Info <info@aicsa.net.au>
Sent: Monday, November 6, 2023 4:37 PM
To: DTI:Plan SA <PlanSA@sa.gov.au>
Subject: Greater Adelaide Regional Plan Discussion Paper feedback form

You don't often get email from info@aicsa.net.au. Learn why this is important

Hi Plan SA team,

I tried making a submission to the Greater Adelaide Regional Plan via the feedback form, but did not receive a confirmation - the page only appeared to re-load! Attaching here in case you haven't received it.

Many thanks,

Kim Roberts
General Manager | AICSA
Pronouns: she/her
Please note I work part-time and will respond as soon as possible.
Kaurna Yerta, PO Box 10334, Adelaide BC SA 5000

ARTS INDUSTRY COUNCIL OF SOUTH AUSTRALIA

an independent voice for the arts

Arts Industry Council of South Australia (AICSA) acknowledges that we live, work and make art on Aboriginal Lands, including Kaurna Yerta. We pay our respect and deep thanks to Elders past, present and emerging, as well as to First Nations leaders in our arts sector.

ARTS INDUSTRY COUNCIL OF SOUTH AUSTRALIA
an independent voice for the arts

PO Box 10334
Adelaide BC, SA 5000
ABN 65 728 182 104

[redacted]
info@aicsa.net.au
www.aicsa.net.au

Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001

Monday November 6th 2023

RE: Feedback on the Discussion Paper for Greater Adelaide Regional Plan

The Arts Industry Council of South Australia (AICSA) is an independent voice for the Arts. As the state's independent, sector-wide representative arts body, the Arts Industry Council of SA (AICSA) is extremely valuable to the South Australian arts sector. AICSA was constituted as an incorporated institution in 1991. The Council receives no operational funding from the government, and derives its support from the industry through member subscriptions, fundraising, sponsorship and in-kind donations.

There are many elements of the *Greater Adelaide Regional Plan Discussion Paper* that highlight forward thinking and a cohesive vision for the future, notably addressing the increased need for equitable housing, and a greener and climate resilient focus. We are specifically interested in how arts and culture play a part in social cohesion, living locally and the quarantining of spaces within public infrastructure for Arts and Cultural activities as part of this plan. There are other outcomes the State Planning Commission should consider.

Some key considerations in response to the paper are;

- First Nations collaborations and leadership within the plan is essential, especially when considering cultural heritage and community engagement, the natural environment, public and social housing and quality of life.
- Prioritising arts and cultural spaces within main street rejuvenation plans and new developments as part of a living locally strategy. Noting that these spaces need support not just in infrastructure but ongoing maintenance and activation budgets, and how commercial development models can assist here. For example, there are many councils across Australia that mandate a 1% spend on public art in any new development over $2million. How could a similar standard be adopted here but focus not only on public art but also the activation of theatres, galleries and live music hubs.
- Local government is best placed to administer these ongoing activities as they know the needs and values of the local community they serve. The Department for Trade and Investment should fund local government to have arts and cultural initiatives within the specific allocated funding for place making and vibrancy within all planned developments. Commercial offerings are also central to the conversation and should be

considered within funding landscape, there should however be no expectation for Local Government to raise funds for creative place making within new and newly activated developments.

- We recommend expanding the remit (and funding) of organisations like Renew Adelaide with a further commitment in suburban areas, contributing to a more equitable and socially cohesive community.
- There are models globally where smart planning of arts and cultural spaces with an integrated approach sees huge benefit to retail, hospitality and small business trade. The *Greater Adelaide Regional Plan* must consider and outline how arts and culture contribute to the jobs creation and a strong economy.
- Strategic infills are the priority. Suburban sprawl is antithetical to social cohesion and arts and cultural community engagement. We encourage you to consider deeply within this plan how residents living locally engage with each other in their communities, and the importance of spaces for public gatherings and storytelling. Urban density is an important factor, there is a reason why some of the greatest culturally vibrant cities are densely populated. It is important to highlight the need for increased public and community housing as many artists are low income earners and renters, and ensuring artists can live and work in cities and neighbourhoods will benefit all.
- In regenerating neighbourhoods we must consider how to support community spaces that already exist to continue, displacement of arts and cultural spaces such as the Bakehouse Theatre on Angas Street in the CBD, and Rumpus in Bowden, over the last couple of years has had a significant impact on community.
- More flexibility in zoning for street scapes, main streets and infill areas for arts and cultural spaces would be of benefit. A consideration for a minimum amount of space (3%) that is quarantined for arts and cultural activities and broader civic spaces in any urban environment is needed. Acknowledging that they don't fit neatly into other zoning requirements or commercial financial models like hospitality and retail trade.
- We can't let the market dictate what the development of arts and cultural spaces look like, as often these spaces are not commercially viable. Developments need to make it easier for operators to run arts and cultural spaces, and the easiest way to do this would be to implement free or highly subsidised rent for these spaces within community – their business model isn't measured on commercial success and can't afford to run on commercial rental agreements. Adopting a model similar to how we quarantine green space within a community is needed, and the benefits arts and cultural activities deliver to community cohesion should be considered.

In summary, significant investment needs to be made into facilities and infrastructure for arts and cultural spaces amidst the planning for new housing developments, regenerated neighbourhoods, and urban activity centres.

DTI:PlanSA Submissions

From: Ingrid Johnston [redacted]
Sent: Monday, 6 November 2023 4:37 PM
To: DTI:PlanSA Submissions
Cc: Jamie Mackenzie
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: ACRS Submission on draft Greater Adelaide Regional Plan_final.pdf

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Dear Growth Management Team,

Please find attached a submission from the Australasian College of Road Safety to the consultation on the Greater Adelaide Regional Plan Discussion Paper.

Please confirm receipt of this submission and let me know if you need any further details.

Thanks,
Ingrid

Dr Ingrid Johnston
Chief Executive Officer
Australasian College of Road Safety
[redacted]

I acknowledge the Ngunnawal and Ngambri people as the Traditional Custodians of the land and water where I live and work. I respect and acknowledge their Elders, past and present.

ACRS Submission

AUSTRALASIAN COLLEGE OF ROAD SAFETY

About the Australasian College of Road Safety

The Australasian College of Road Safety was established in 1988 and is the region's peak organisation for road safety professionals and members of the public who are focused on saving lives and serious injuries on our roads.

The College Patron is His Excellency General the Honourable David John Hurley AC DSC (Retd), Governor-General of the Commonwealth of Australia.

To:
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GPO Box 1815 Adelaide, SA 5001
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For further information please contact:

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Dr Ingrid Johnston: Chief Executive Officer, Australasian College of Road Safety
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6 Nov 2023

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Introduction

The Australasian College of Road Safety is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.

The College believes that we should prevent all fatal and serious injuries on our roads; the road traffic system must be made safe for all road users; system designers should aim to prevent human error and mitigate its consequences; life and health are not exchangeable for other benefits in society; and that all College policy positions must be evidence based.

Greater Adelaide Regional Plan (GARP)

According to the consultation website, "*the State Planning Commission (the Commission) have released a Discussion Paper for the Greater Adelaide Regional Plan and want to hear from community, councils and industry on how we prepare for future growth. The discussion Paper is an evidence-based document with a strong focus on what the Greater Adelaide Region may look like in 30 years' time. It presents key considerations and trends that we need to consider in our future planning. Bold decisions are required to strengthen the sustainability, liveability and prosperity of the Region*." ACRS welcomes the opportunity to make this submission.

ACRS response to the Discussion Paper

a) The burden of road trauma

In the 10 years between 2013 and 2022, 950 lives were lost and more than 7,100 people were seriously injured on South Australian roads.(1) Over this time, 56% of lives lost and 72% of serious injuries occurred in the Greater Adelaide Regional Plan (GARP) area (Figure 1).

This level of road trauma has now been steady for many years, noting that South Australia's statewide road fatalities have plateaued at around 100 per year since around 2006 as shown in Figures 2 and 3.

Without radical change to the way we plan and manage our road networks, we are currently on track to see almost 3,000 people killed on our state's roads over the next 30 years. At the current rate of 56% of fatalities and 72% of serious injuries occurring on roads within the GARP area, this equates to around 1,600 people killed and 15,000 people seriously injured on these roads over the 30-year horizon of the GARP.

With the population projections for the Greater Adelaide Region showing growth by up to 670,000 people over the next 30 years (an increase of up to 46%) as noted in the discussion paper, the number of fatalities and serious injuries from road crashes would be expected to be even higher without significant actions being implemented to improve road safety.

Beyond the human trauma, it should also be acknowledged that poor road safety is also a burden to the economy and the health system.

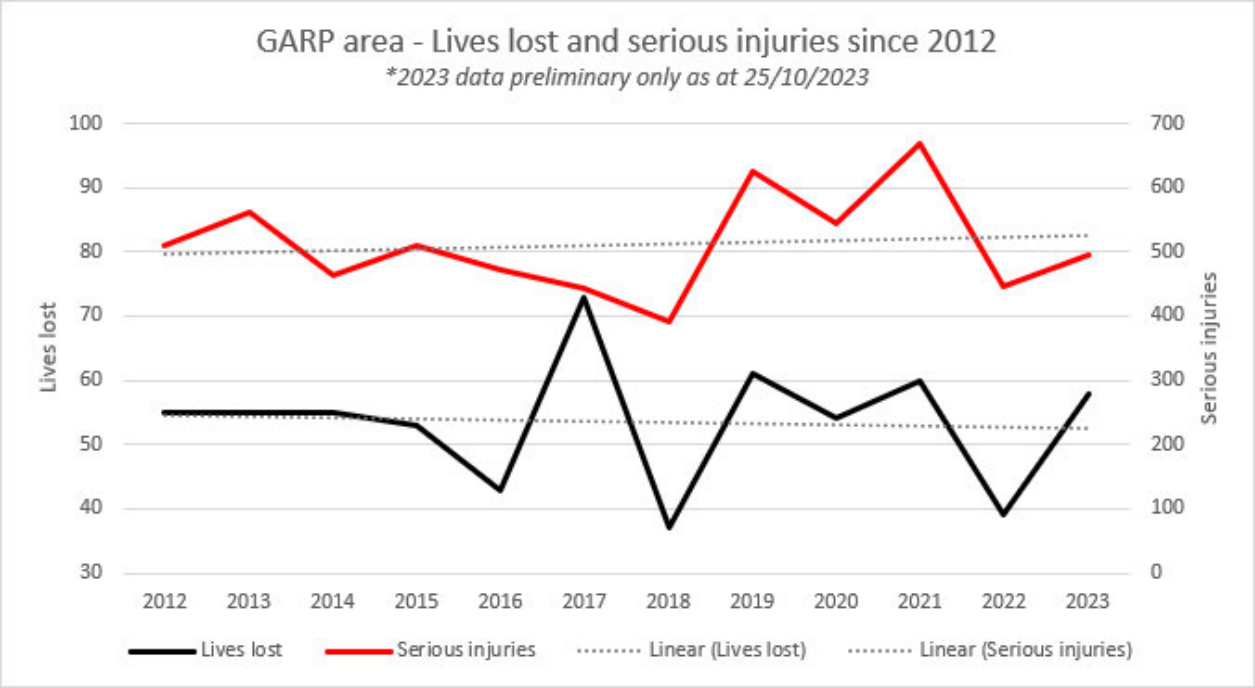


Figure 1
Source: Generated from data obtained from DIT

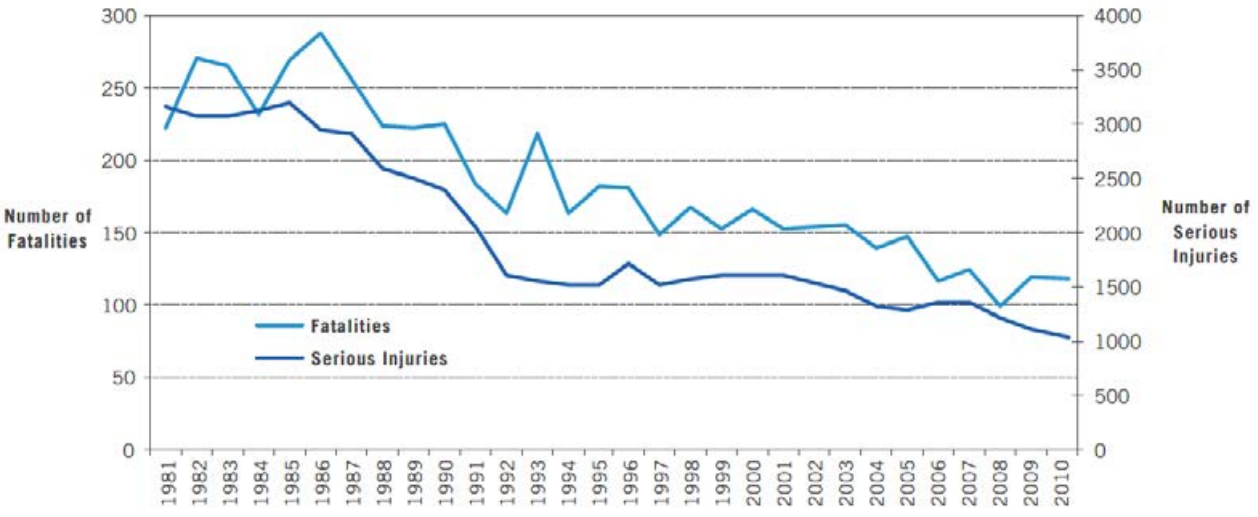


Figure 2
Source: Towards Zero Together – South Australia's Road Safety Strategy 2020(2)

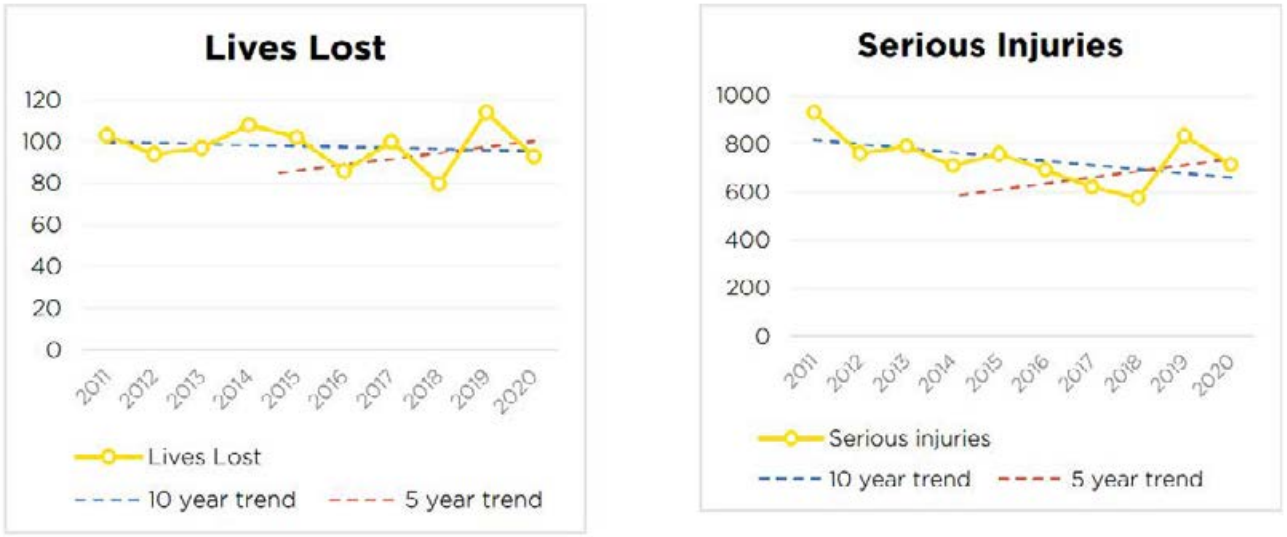


Figure 3
Source: South Australia's Road Safety Strategy to 2031(3)

b) Prioritisation of road safety

Greater Adelaide's future population deserves to experience safe travel on the road network, without the risk of being killed or seriously injured. There is good conceptual alignment between many areas of road safety and the GARSP discussion paper, such as:

- Avoiding the need for road journeys (page 49);
- The understanding that social inequity leads to greater vulnerability to crash risk (page 59);
- The concepts of Living Locally, incorporating:
    - Increased use of public transport,
    - Increased use of active transport,
    - Inclusion of active transport infrastructure in new builds (page 91),
    - Encouragement of shorter journeys making use of locals streets/roads; and
- The strategic separation of lands (and transport infrastructure) dedicated to industry vs housing.

However, it is concerning that the Discussion Paper makes no direct mention of the vital need to embed road safety into any planning vision, given that it is impossible to achieve universal liveability when people continue to be killed or seriously injured on our roads. Past experience has shown that improvements to road safety do not come quickly, or cheaply, and so a strategic approach is required.(4) As such, it is vital that the GARP acknowledge and prioritise road safety as a key objective.

We draw the Commission's attention to South Australia's Road Safety Strategy to 2031(3), with its vision of "Zero lives lots on our roads by 2050". This strategy and its accompanying Action Plan has the important targets of at least a 50% reduction in lives lost and at least a 30% reduction in serious injuries on South Australian roads by 2031. The Strategy contains the "*Principles for decision making and investment*", which states that "*road safety will be a key criteria in all decision making frameworks for investment decisions and policy setting*". We note that the document also states that these principles "*will guide the South Australian Government's decision making on transport related investments, policy setting, programs and initiatives*".

c) Modern strategic concepts for improving road safety

In addition to South Australia's Road Safety Strategy to 2031 we would like to bring the Commission's attending to the following road safety concepts.

The safe system

South Australia's Road Safety Strategy to 2031 states that "The Safe System model is regarded as international best practice and is the framework for improving road safety across Australia"(3). Austroads defines the Safe System as a philosophy that brings a public health focus to road safety that aims for harm minimisation, centred on the acknowledgement that human errors can lead to unintentional death and injury and highlighting that human wellbeing should take precedence over efficient movement(5). The key principles of the Safe System Model are that:

1. People make predictable mistakes that can lead to road crashes;
2. The human body has a limited physical ability to tolerate crash forces before harm occurs;
3. A shared responsibility exists amongst those who plan, design, build, manage and use roads and vehicles to prevent crashes resulting in serious injury and death; and
4. All parts of the road and traffic system must be strengthened to multiply their effects; and if one part fails, road users are still protected(6).

In applying this approach there must be an emphasis on prevention, not just mitigation, of road trauma through design which prevents crashes, with a recognition that:

- The road traffic system is a complex interaction of many interrelated components, involving many participants in different situations;
- Many road user errors and crashes are created by the interactions between road system components;
- The design and operation of a safe road traffic system must respond to the capacities as well as the limitations and vulnerabilities of the human user; and
- Understanding the causes of road traffic crashes and injuries requires understanding interactions within the broader road traffic system and other aspects of society.(7)

Movement and Place

This is a concept that considers road function in road design and operation and categorises the role of roads and streets based on their local context. Roads with a 'movement' function, such as motorways, provide for high traffic volumes and speeds and have little pedestrian activity or local community function. Roads with a 'place' function are typically local streets that accommodation high numbers of pedestrians, with any passing vehicles travelling at low speeds. This approach informs speed management and road design(3).

The Movement and Place approach significantly underpins the application of the Safe System and is a key way of making roads safer for vulnerable road users. Speed is a major consideration. South Australia's Road Safety Strategy to 2031 states that "Pedestrians are at greater risk of death and serious injury if hit at impact speeds above 30 km/hr. The most vulnerable pedestrians are children and older people". This is evidence based – see the ACRS Policy Position Statement on Speed Management(8). Accordingly, we consider urban designs should be aiming for 30 km/hr speed environments on areas with high levels of pedestrian activity such as residential streets.

Vulnerable Road Users and Active Travel

On roads where vehicles interact with pedestrians and cyclist, these users are inherently more vulnerable in crashes as they have little to no protection to mitigate the forces experienced by the human body in a collision event(9). Whilst the benefits of active travel are widely established, the risk of injury or death to these vulnerable road users is often a major barrier for people seeking more sustainable and accessible travel modes.

AusRAP

AusRAP (Australian Road Assessment Program) is the Australian version of the International Road Assessment Programme (iRAP), which involves a standardised process to apply star ratings to roads as an objective measures of the level of safety that is "built in" to the road(10). AusRAP measures and communicates the safety risk of road infrastructure and is being increasingly utilised in Australia.

On Monday 18th September 2023, Australia's states and territories announced they had agreed that they will publish AusRAP star ratings on all arterial roads by 2025, as part of a wider commitment to a national target of at least 80% of travel occurring on 3-star or better roads by 2030.

CLOCS-A

CLOCS-A or Construction Logistics and Community Safety Australia, is a national good practice approach for managing the risks and impacts associated with a construction project's on-road transport and logistics activities to improve community road safety. The primary goal of CLOCS-A is to achieve reduction in lives lost and serious injuries associated with construction logistics in Australia(11). To achieve this, CLOCS-A designates a set of minimum standards that heavy vehicles should meet (e.g. the fitment of safety equipment or the removal of dangerous fixtures like bull bars) to reduce the likelihood (or consequences) of a collision with a vulnerable road user.

Shared responsibility in road safety

The Safe System approach seeks to recognise the responsibility shared by all contributors to the elements of the system. There is a responsibility to collectively manage all inputs so the likelihood of a crash is minimised. The responsibility also continues so that when a crash occurs, every attempt is made to minimise the likelihood it results in fatal or serious injury. Contributors to the system include the people who plan, design and build roads or vehicles, as well as anyone whose actions can influence road trauma, including road managers, vehicle manufacturers, legislators, commercial transport operators, police, employers and individual road users(6).

The ACRS has published a Policy Position Statement on "A new systems thinking approach to road safety" which highlights the need to consider the accountability of governments and government agencies in governing and managing road safety performance(7). Whilst "shared responsibility" is a principle of the Safe System, the ACRS recognises the different participants within the road system hold different levels of authority, responsibility and power.

In South Australia, all South Australian Government agencies hold the highest level of authority as (whilst they are not solely responsible for road safety) they set societal expectations, regular the safety of roads, and oversee the delivery of system-wide safety activity through investment. The GARP represents a vital

opportunity for the South Australian government to acknowledge and action its primary level of authority and accountability.

d) Responses to selected consultation questions

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

ACRS considers that the four outcomes are appropriate and necessarily strategic in nature. We point out that improved road safety will contribute to all of the outcomes through more localised, lower speed and active transport occurring in communities leading to lower emissions, greener spaces (particularly along active transport corridors), wider housing choices and improved health through much lower road crash trauma and more active travel.

ACRS believes that the GARP should prepare for an Adelaide in which vehicle speeds are lower, alternate transport options are available, accessible, reliable and affordable; and the safety of active travel modes are prioritised.

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?

As stated above, a major driver missing from the discussion paper is the officially stated vision of zero deaths and serious injuries from road crash trauma by 2050, and the 2031 target of at least a 50% reduction in deaths and 30% reduction in serious injuries.

A principle of *South Australia's Road Safety Strategy to* 2031 is: "*In planning the transport network we will consider the function of roads and the adjacent land use to provide safe movement and safe use for road users and visitors*". The *Strategy* further notes that the embedding of the "Movement and Place Approach" into the design of safer roads, suburbs and towns is a key strategy to improve safer roads for all road users.

We strongly content that any contemporary land use planning strategy or policy must acknowledge the Movement and Plan Approach as a foundation towards harmonising the transport networks that serve urban development to be safe. Making strong references to the Movement and Place Approach would reinforce the Commission's Guiding Principle for GARP: "Integrated – Bringing together land use planning with the delivery of transport infrastructure and public spaces".

What else would the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive society?

In acknowledgment that social inequity leads to greater crash risk(12, 13), the GARP should identify ways that all transportation modes can be made safer. This can be informed by two of the concepts previously noted. First, the adoption of a Movement and Place Approach will guide the implementation of safe transport corridors for the entire community, regardless of socio-economic status. Secondly, full and proper accountability for poorly performing road infrastructure, under a shared responsibility model which recognises differing levels of power, authority and responsibility, will drive investment to the most at-risk locations.

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

Greenfield development provides an ideal opportunity to design and build road networks that facilitate highly walkable neighbourhoods and encourage greater use of active travel. This should be founded on Safe System compliant street typologies, including features that restrict vehicle speeds to a maximum of 30 km/h and providing comprehensive and convenient walking and cycling networks linking housing with local attractions. The provision of active transport infrastructure as part of master planned growth (page 91) is supported and should be a required component in new land developments.

Higher-order roads must also have high-quality walking and cycling elements, ideally separating these users from moving vehicles and having effective and convenient pedestrian crossing facilities that force vehicles to travel at low speeds, such as wombat crossings. The GARP should recognise that the greatest impediment to the uptake of active travel is safety(14-16). Active travel routes need to be connected, continuous (without high-risk sections or crossings), and provide proper amenity for users (wide, flat, maintained, etc).

Provision of public transport opportunities that are safe, convenient, efficient and accessible is also vital to reduce the dependence on private vehicle travel, which has been typical for greenfield sites located on the fringes of Metropolitan Adelaide.

We consider that the GARP should call for new roads to have an AusRAP star-rating of at least 3 stars. This would assist the Living Locally concept as potential design features would be low speed and friendly to active transport modes. Furthermore, we consider that the GARP should call for developers to publish the star ratings of both newly constructed roads, as well as upgrading roads and intersections where greenfield developments interact with existing established road infrastructure. It is important to note that when upgrading existing roads to accommodate new growth, a primary focus seeking to increase road capacity and/or vehicle speeds such as by widening the formation may be contrary to the Movement and Place approach. In many cases, the narrowing of roads to re-purpose the space away from vehicles to better accommodate pedestrians, cyclists and green space is likely to provide overall net benefits consistent with the principles of the GARP.

What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?

Design principles that facilitate highly walkable neighbourhoods should also apply to satellite cities, with densities concentrated around activity centres. Where such areas also have high tourist demands, particular care must be taken to design infrastructure that accommodates the high level of temporal fluctuations that are experienced in these areas.

It should also be acknowledge that growth of satellite cities will increase travel between those cities and Adelaide. This. Travel will occur through regions that retain rural characteristics, and, as such, will continue to have rural roads that are often high speed, often narrow, often windy, and too often the scene of tragic crashes. In terms of land use and development, any new rural roads or alterations to rural roads and intersections arising from developments should be built to the highest practical level of safety and achieve an AusRAP star rating of 3 stars or more.

What do you see as the benefits and potential drawbacks of greenfield development?

The primary benefit of greenfield development is to be able to implement the latest best practices for infrastructure design. Whilst the up-front construction costs of high-quality infrastructure may be perceived as being too expensive, safer roads can provide tremendous value when the current social cost of road crashes in Australia has been estimated to range between $22.2 and $30.3 billion annually between the years 2016-2020(17). Greenfield development is the optimal time to provide a safe road system up-front that minimises the potential for harm to all future road users.

A major drawback of greenfield development is the entrenched social disadvantage that often occurs due to the higher transport costs associated with living in outer suburbs. The lower up-front cost of housing in these areas tends to attract residents from lower socio-economic cohort, but lack the more convenient travel opportunities typically available in established suburb. This tends to result in higher levels of car dependence, with the subsequent higher levels of vehicle interactions on our roads increasing the probability of collisions and trauma.

How can infill development achieve an urban form that is consistent with the principles of Living Locally?

We support the "Living Locally" concept which aligns strongly with the Walking, Cycling and Public Transport strategic focus areas of South Australia's Road Safety Strategy to 2031. The encouragement of shorter journeys making use of local streets and roads would reduce the potential exposure to crashes and thus help improve road safety. Application of the Movement and Place approach as outlined above should be a key methodology for achieving a greater degree of living locally.

What do you see as the benefits and potential drawbacks of infill development?

Of particular note, with regard to infill development, is the proposed development of urban corridors. Transit corridors and residential zones are not a suitable mix unless vehicle speeds are lower than those generally applied across the metropolitan area. In the Prospect Road example (page 136) it is encouraging to note that the speed limit was reduced. However, Figure 10 (page 137) suggests that virtually all major roads leading into and out of the CBD are being considered as urban corridors and it seems impractical (and likely unpopular with the community) that speeds on all these roads will be reduced to a level that is consistent with the intended increase in pedestrian activity. It is suggested that the Movement and Place approach be utilised in the next phase of urban development corridor planning to select which corridors are more amenable for development and which are better suited to serve as movement corridors.

What are the most important factors for the Commission to consider in meeting future demand for employment land?

In locations where there are frequent interactions between heavy vehicles and vulnerable road users such as pedestrians, cyclist and motorcyclists there is an increased risk of serious consequences when a collision occurs. The GARP prudently makes the point that land areas dedicated to traditional industries should be separated from areas designated for housing. However, the point is also made that knowledge intensive industries and population service areas are more strategically located close to residential areas which will

result in the presence of pedestrians and cyclists. In these locations there are still likely to be significant numbers of heavy vehicles performing tasks such as delivering goods or construction activity.

In these areas, it is suggested that the implementation of CLOCS-A should be considered. This will significantly contribute to the attraction of businesses and their employees, thus contributing to growing and sustainable economic activity.

There are several areas mentioned within the GARP discussion paper that could be considered for the implementation of CLOCS-A to improve safety and amenity, such as:

- Osborne
- Edinburgh Parks
- Adelaide Airport
- Wingfield
- Mawson Lakes
- Tonsley
- LeFevre Peninsula
- Outer Harbour
- Gilman
- Lonsdale
- Lot Fourteen
- Thebarton BioMed

Conclusion and Recommendations

ACRS supports the broad aims of the GARP and recognises that the GARP discussion paper is necessarily a very high-level strategic document outlining ways forward for the Greater Adelaide Region's land use planning and associated infrastructure and environmental needs.

Accordingly we make the following broad recommendations to improve the GARP and the safety of the residents within and visiting the Greater Adelaide Region:

1. South Australia's Road Safety Strategy to 2031 and its associated Action Plan be referenced in the GARP as a key companion strategy, including with an explicit acknowledgement of the opportunities to improve road safety through GARP, showing that the government acknowledges and is actioning its primary level of authority and accountability.
2. Incorporate the Movement and Place approach as a key concept within GARP.
3. That GARP has a stated objective that urban designs should be aiming for 30 km/h speed environments in areas of high pedestrian activity such as on residential streets.
4. That GARP call for a requirement that all new and improved roads associated with greenfield land and infill developments have an AusRAP star rating of at least 3 stars.

We appreciate the opportunity to make this submission and contribute to improved road safety for all road users in the Greater Adelaide Area through the GARP. Please do not hesitate to contact us should you need any further information.



Dr Jamie Mackenzie
Chair SA Chapter
Australasian College of Road Safety



Dr Ingrid Johnston
CEO
Australasian College of Road Safety

6 November 2023

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Please find attached the submission prepared by the Institute in response to the GARP Discussion Paper.

Kind Regards,

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RESPONSE TO THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

→

(GARP DISCUSSION PAPER)

Department of Planning and Land Use Services



Greater Adelaide Regional Plan Discussion Paper

Submission issued November 2023

Australian Institute of Architects

INFORMATION ABOUT THE INSTITUTE

- The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with more than 14,500 members across Australia and overseas.
- The Institute's vision is: *Everyone benefits from good architecture*.
- The Institute's purpose is: *To demonstrate the value of architecture and support the profession.*
- At the time of this submission the National President is Stuart Tanner FRAIA and the Chief Executive Officer is Cameron Bruhn.

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The Australian Institute of Architects recognises the unceded sovereign lands and rights of Aboriginal and Torres Strait Islander peoples as the First Peoples of these lands and waters. This recognition generates acknowledgement and respect for Aboriginal and Torres Strait Islander Countries, Cultures and Communities, and their ways of being, knowing and doing. Caring for Country practices including architecture and place shaping have existed on this continent since time immemorial.

The Institute recognises a professional commitment to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples. Together we will support and develop the emergence of new possibilities for our shared future.

About the cover photo

Angaston Hill by Taylor Buchtmann Architects.
Traditional Land Owners: The Tarrawatta people of the Peramangk nation.
Photographer: Peter Barnes.
The Australian Institute of Architects' 2022 SA Chapter Award for Sustainable Architecture; a Chapter Commendation for Residential Architecture – Multiple Housing

For further information visit: https://www.architecture.com.au/awards/2022-awards/2022-sa-architecture-awards-entrant-gallery

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1. INTRODUCTION

The Australian Institute of Architects (the Institute) welcomes the opportunity to provide its response and recommendations in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper.:

1.1 Background

The Institute has been involved in the planning reform process in South Australia since 2012. The key areas of interest for the Institute have been:

- The importance of a consistent planning system to provide certainty to the development sector and the community.
- The importance of an integrated planning system.
- Improving the quality of built outcomes though good design.
- Recognition and protection of character and heritage in the planning system to support local identity, community and culture.
- Establishment of a local design review process including clear triggers to identify which applications are required to undergo local design review.
- Establishment of accreditation for professionals involved in development assessment to improve the quality of decision making and increase public confidence in the SA planning system.
- Recognition of the rigorous education and registration processes that apply to the architecture profession and the expertise architects provide in performance assessment of design quality.

The Institute identifies that all neighborhoods require:

- Amenity
- Accessibility (walkability and penetrability)
- Attendance and Activation
- Connectivity
- Diversity and Inclusion (in terms of diversity of demographic and building typology / land use)
- Flexibility within the Planning System to allow for innovation / alternate land use

The Institute has also been involved at a State and National level in discussions around housing affordability, supply and equity. One of the six priorities of the Institute's 2022 Federal Election advocacy campaign, *A Time for Action,* was a broad recommendation to "Fix the supply of affordable and social housing". Further information is available in the Institute's Housing and Homelessness Plan submission. While this submission addresses specific conditions in Tasmania, it also provides an understanding of the Institute's approach to current housing issues.

Finally, the Institute is active in advocacy relating to regenerative design, decarbonisation, improved energy performance, alternative construction methodologies, equity in the built environment and health and wellbeing. These are all interrelated and have relevance to the GARP Discussion Paper.

2. Response to GARP Discussion Paper.

2.1 General Comments

The Institute's SA Chapter is generally supportive of the overarching principles, drivers and outcomes in the GARP Discussion Paper.

In relation to the stated principles the Institute strongly supports:

- An integrated approach in development of the GARP. The GARP will shape the way residents of greater Adelaide live through consideration of:
    - housing distribution and diversity
    - connectedness to services, employment, education and community facilities
    - social and cultural richness
    - access to green space.

  The Institute believes that people and the environment should be considered first in development of strategies for housing, hard and soft infrastructure, employment opportunities and land use to achieve a truly equitable and liveable greater Adelaide.
- Alignment to the State Planning Policies as these provide a well-considered and comprehensive set of principles that inform the SA planning system. It is critical for industry and community confidence that the GARP provides a strategic framework that is consistent with the planning system. Alignment with other strategies and plans is also important. However, the Institute recommends that where these relate to transport and social infrastructure, they should be informed by the GARP as the overarching framework that has the role of informing these more focused areas of urban development.
- A visionary approach is required to address the urgent issues we have in relation to housing affordability and supply, climate change, biodiversity loss and chronic disease. Except for housing affordability and supply, these can all be directly linked to the rise of car centric urban development. This situation has developed over the past 70 years and requires long term, consistent strategy and action to achieve real and lasting change. It also requires us to consider approaches that go beyond market lead, business as usual thinking, as these are clearly not delivering the outcomes we need.
- The urgency of the issues facing South Australians makes measuring the impact of the GARP essential. Clear and proactive targets need to be defined to measure short, medium and long-term outcomes, and to inform changes to the GARP where these targets are not being achieved. This also requires the GARP to accurately document current conditions to provide a benchmark against which progress can be measured.

The Relevant and User-friendly objectives are also supported.

However, the Institute believes that land use needs to be considered in a more nuanced manner to achieve the objectives stated in the GARP Discussion Paper. Currently, land use focuses on zones with a largely consistent use – residential, employment, industrial, cultural, retail. This model resulted post-war from the desire to provide people with a healthier environment by separating noisy, polluting activities from residential areas, and the ability to separate activities geographically due to the rise of car ownership. However, it comes at the cost of decentralisation, social isolation and car dependency.

With the evolution of employment giving rise to clean, knowledge based activities and the improved processes now used by many industrial and manufacturing businesses, the need to separate residential and employment lands so strictly needs to be reconsidered and flexible, multi-use zones used more widely to facilitate walkable, self-sufficient communities that support the living locally model proposed in the GARP discussion paper.

The Institute has also considered the Major Trends and Drivers listed in the GARP Discussion Paper and makes the following observations:

- the digitalization driver should include AI, as this is developing rapidly and will impact the way people live and work.
- Decentralisation is only supported in the context of development of greater Adelaide as a series of interconnected but district villages. The Institute does not support decentralisation that results in suburban sprawl and further subdivision of land in Environmental Food Production Areas or Character Preservation Districts.
- The focus on sustainability needs to be strengthened and used as a lens to assess the other aspects of the GARP. This is required due to manage climate change effectively and achieve carbon-zero by 2050.

2.2 Questions

The Institute also has the following questions regarding the assumptions in the GARP Discussion Paper:

What area per dwelling is assumed in the calculation of the land supply required?

What are the:

- household size
- land size per dwelling
- mix of dwelling types

assumed when calculating the land supply to accommodate 300,000 additional households required in the maximum growth scenario? These need to be clearly stated to provide evidence to test the assumptions shaping the future development scenarios.

Is the assumption used to determine the land supply required based on current development patterns, and do these reflect the emerging demographics for household size and needs?

The GARP Discussion Paper notes (p 22) that there has been 1% population growth in the past 10 years. This is predominantly due to overseas migration. The need for additional dwellings is being driven by the 78% increase in single person households and a 52% increase in couples with no children which has occurred since 1991.

However, CSIRO data for 2021 shows that 75% of dwellings in greater Adelaide are detached homes and that 50% of homes have 3 bedrooms and a further 25% have 4 or more bedrooms. This appears counter to the demographics for household size. The size of dwellings also works against housing affordability, which is noted as an objective in the GARP Discussion Paper. Finally, increased housing sizes are directly working against decarbonization.

The Institute therefore recommends that detailed consideration needs to be given to the mix of housing types and land area required per dwelling when determining the land supply required over the next 30 years. It also needs to be clear about where future development can occur, based on the impact that inappropriate development will have on our future.

It is critical that the GARP provides a clear vision for the city that we want and provides mechanisms for achieving that vision. Data referenced in the Discussion Paper demonstrates that a development strategy that is predicated on a market driven, business-as-usual approach will not deliver housing diversity or affordability and will not reflect changing household demographics.

Is the city working hard enough?

The number of dwellings in Adelaide is increasing but population density is 1,700/km^2 and there remains a significant amount of underutilised land. This takes the form of at-grade carparking, single storey warehouse and showroom buildings, cleared development sites and vacant/underutilised buildings. Activating these sites through development and adaptive reuse needs to be incentivised to maximise the potential of the city.

What is meant by decentralisation?

Decentralisation is used in the GARP Discussion Paper in relation to greenfield development and expansion of existing outer-metro centres. A distinction needs to be made between policies that will lead to further suburban sprawl, as opposed to well managed consolidation around existing towns or the development of new 'urban villages'.

Have vacant housing and short-term rentals been considered in addressing housing supply?

We know that there are significant numbers of vacant/underutilised homes, and houses used for short term rental across greater Adelaide. Goolwa is a prime example, where holiday housing makes up a large proportion of the housing stock.

We need to better understand numbers of vacant sites/buildings and underutilised buildings to determine need for new housing land. How many houses are holiday homes with minimal occupation? How many homes are used for short term rental such as AirBnB? Is there value in incentivising these for long term rental, at least until the current housing availability crisis is addressed through new construction?

What is Adelaide's 'personality'? What attracts people?

Understanding what attracts people to live in Adelaide is essential to ensure that the GARP provides a sustainable and well-formed plan for future development and delivers against the stated liveability, amenity and economic development goals. We need to provide an urban form and infrastructure that builds on this reputation and ensure that housing supply meets the needs of young and migrant workers.

Do new houses on greenfield sites deliver affordability?

The Institute questions the statement in the GARP Discussion Paper, which asserts that 'new housing on greenfield estates is an important supply of affordable housing."[1] The Institute also notes that the Discussion Paper references Victorian research that has found that greenfield development, while more affordable initially, results in higher ongoing living costs for households and the broader community.[2]

The Institute recognises and supports the proposal in the Discussion Paper that these developments should be masterplanned. We suggest that masterplanning be further supported by development urban design 'rules' for SA to provide benchmarks for large scale development, and that masterplans should be subject to design review and monitored throughout delivery.

Proposals in the Discussion Paper regarding infrastructure schemes to provide a mechanism for charging developers against the profit made from rezoned land are supported by the Institute. The infrastructure levy needs to reflect the real costs to the community for delivering infrastructure to un-serviced land to be effective. They should not be directly offset by government stimulus programs.

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[1] GARP Discussion Paper P 111

[2] Ibid P 96

Does greenfield development address effectively address the housing supply crisis?

The need for additional housing supply in greater Adelaide is not in question. However, the ability to address this need through greenfield development is. While greenfield proposals allow for announcement of the potential of large numbers of dwellings, the time taken to deliver those dwellings is considerable. This can be seen in the development of new subdivisions in Mt Barker Growth Area, which were proposed in 2010. Over a decade later, only around 20% of the potential housing has been constructed. Significant issues regarding infrastructure have also been identified, which will also take time to address.[3]

Greenfield development is clearly not going to provide a short or even medium-term solution to housing supply. Activation of existing buildings coupled with well-considered infill development and public education regarding the housing we need, as opposed to the housing we believe we want, are all required to deliver the outcomes identified in the Discussion Paper.

What have we learned from the current 30 year plan?

While there is commentary about how greater Adelaide has developed over time and what has been achieved over the past 30 years, there is no specific analysis in the GARP Discussion Paper regarding the impact of the existing 30 Year Plan and what we can learn from it. Have the objectives of the existing 30 Year Plan been realised? If not, why is this the case and how does this inform development of the GARP?

3. RESPONSE TO SELECTED FOCUS AREA QUESTIONS

3.1 Outcomes

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

The four outcomes stated in the GARP discussion paper are supported. We suggest the following wording be considered for the first dot point.

- A greener, climate resilient environment that regenerates and fosters natural systems.

We also suggest that the following objective be added.

- An urban form that reflects holistic and inclusive decision-making including recognition of Country and the voice of traditional owners.

3.2 Trends and Drivers

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?

As discussed above, the Institute supports development of a nuanced land use model that reduces the separation between residential, retail, recreation, and knowledge-based employment. This will support the living locally concept, which is in turn a key driver for achieving the four stated outcomes in the GARP Discussion Paper.

Suggested zoning could be introduced as follows:

- Urban Village Zone (core) – mixed use development with small scale retail, employment and services at lower levels and housing above. Primary school and community social/cultural

[3] Learn from Mt Barker. InDaily 6/10/2023

facilities.
- Urban Village Zone (inner) – row and semi-detached residential with distributed small-scale retail, employment and services and public green spaces.
- Urban Village Zone (fringe) – semi-detached and detached family homes
- Inter-urban Village Buffer – common green space – no built infrastructure permitted excepting public shelters and amenities.

These new zones would be subject to sub-zones and overlays as per existing zones in the Planning and Development Code. This would recognise local character and culture.

While this structure may not be immediately achievable it provides a framework for consolidation of existing developed areas as well as the establishment of new development. In areas with established character, this structure may need to be adapted. However, much of the pre-WW2 development of Adelaide followed this pattern and could be used to guide consolidation. In areas where suburban, car-focused residential development has occurred, it could provide a strategy for future development that delivers the living locally concept over time.

Dedicated single use zoning is only supported in limited cases. For example, in relation heavy industry and other activities that have a significant impact on the amenity of surrounding areas.

Single use zoning is also supported for environmental protection areas and food production areas to protect these from encroachment by residential development. As noted in the GARP Discussion Paper, the effects of climate change are reducing the viability of food production areas and it is critical that those close to residential centres are maintained to secure sustainable future food supply for the greater Adelaide region.

3.3 Environment Objective

What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?

- Mandating open, green space requirements in urban areas including measurable tree canopy targets. This should be developed in consultation with Green Adelaide who are developing the Urban Greening Strategy.
- Where the planning system currently provides exemptions for certain types of development this should be offset by a requirement for green space and tree planting in the public realm immediately adjacent to the development as opposed to the current payment of a levy.
- Establishment of biodiversity corridors, including natural waterways, to create a network throughout the greater Adelaide region. This should be considered and established with the same level of priority that is given to transport infrastructure networks.
- Mandate that all at-grade carparking be designed to provide a minimum of 50% tree canopy cover and with a minimum of 50% permeable paving.



Welland Carpark – Trees have been planted, but are widely spaced and not thriving, so they provide limited shade. Stormwater is directed to spoon drains in the middle of the roadways.

SUGGESTED SOLUTION: Re-fall road paving to direct stormwater to the parking spaces and replace bitumen in car spaces with permeable paving. This would direct water to trees to promote healthy growth and increase canopy.

- Prioritise the re-establishment of mass transit systems as opposed to private vehicle transport systems. Private vehicles and the road networks built to service them are significant contributors to carbon emissions. This is acknowledged in the GARP Discussion Paper (p48). It is also acknowledged that most private vehicles are only used 4% of the and are parked for the remainder. Reducing the need for private cars, through mass transit systems connecting walkable neighbourhoods, would significantly reduce the area of greater Adelaide dedicated to road and carparking infrastructure, which is not supporting the greener, wilder more climate resilient GARP objective.

CASE STUDY: Wales has legislated to pause all new major road projects as part of their strategy to reduce carbon emissions and decrease reliance on private car transport in favour of active and public transport.[4] This is coupled with strategies for developing policies to improve mass transit, clean transport, freight networks, road safety and active transport. It forms part of a coordinated, whole of government approach to addressing climate change, economic development, and urban development.

The Transport Delivery Plan notes that 'planning authorities should identify development sites which are highly accessible to non-car modes and allocate them for travel intensive uses such as offices, shopping, leisure, hospitals and housing of sufficient density to fully utilise their accessibility potential. Sites which are unlikely to be well-served by walking, cycling and public transport should not be allocated for development.'[5]

The report goes on to say 'We can't continue to do what we've always done; we have to do something different, and transport must play its part. … We need to change our culture and behaviour to make sustainable transport choices the socially desirable choice. We are investing in the future but today people continue to choose the private car where for shorter journeys active travel is already an option and for other journeys there is a public transport alternative.'[6] The transport strategy includes a program of education, training and legislation to build understanding of the need for change and deliver the change in a well-managed way.

In the introduction to the Plan, the Welsh Minister for Transport says '…For the last 70 years whenever we have hit a transport problem our go-to solution has been to build a new road. The primacy of car transport is deeply embedded in all aspects of our thinking and practice. …. Reducing and re-prioritising our investment on new road schemes and increasing our investment in sustainable modes will help modal shift, but it will also deliver wider benefits. These include less air pollution, more successful town and neighbourhood centres and a transport system that is accessible and fair for all. … To be clear; none of this is easy, but neither is the alternative. If we are to declare a Climate and Nature Emergency, and legislate to protect the Well-being of Future Generations, and put into law a requirement to reach NetZero by 2050, we have to be prepared to follow through. In doing so, we will not only benefit our environment, but also clean the air we breathe, and promote healthier lifestyles for ourselves and future generations.'[7]

[4] Welsh National Transport Delivery Plan 2022 – 2027 - https://www.gov.wales/sites/default/files/publications/2023-02/national-transport-delivery-plan-2022to2027.pdf
[5] ibid p 29
[6] Ibid p 42
[7] Ibid p 3-5

3.4 Equity Objective

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?

There is discussion in the GARP Discussion Paper about the impact that outer suburban development has on equity and social cohesion and the growing inequity in Australian society. (p 59-60). Inequity can be clearly mapped[8] across greater Adelaide, with people living in the CBD and inner suburbs having disproportionate access to social infrastructure, transport options, employment opportunities, tertiary education and green space. Residents in outer suburbs generally have lesser access to public transport and are reliant on private vehicles to access shops, schools, health care and other services. This is a significant cost and leads to social isolation for those who cannot afford to own and operate a car per adult household member. Residents in these areas also have a higher instance of chronic illness.

To address the compounding disadvantage caused by the existing urban form of the greater Adelaide region, the Institute strongly recommends that future greenfield single zone residential development be removed as an option in the GARP and replaced with the urban village development model outlined earlier in the submission. This model is relevant to expansion of existing outer-metro town settlements or, where no other option exists, establishment of new towns complete with the infrastructure to support the living locally concept.

3.5 Economy Objective

What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?

We need to attract and retain skilled workers to support a strong economy. To do this effectively we need to be clear about what young people and migrants want. A key factor is providing places for these people to live that are:

- Affordable – a range of small-footprint dwellings as part of mixed-use development in the urban village centre to cater for students, new migrants and singles/couples without children. These would be complemented by duplex and detached family dwellings within an walkable/cyclable radius of the centre. This would enable people to access housing and services throughout their lives within a chosen community.
- Comfortable –quality design to provide residents with a high level of amenity and efficiency to maximise liveability.
- environmentally suitable
- connected - well located in relation to employment, retail, services and primary schools as well as community recreation, cultural and social spaces. Each urban village would have efficient public transport connections to civic centres where secondary and tertiary education, significant cultural, recreation and employment facilities and large-scale employment places would be located.

The living locally concept in the GARP Discussion Paper strongly supported by the Institute as a mechanism for attracting and retaining the people we need to build a strong economy.

3.6 Housing Diversity Objective

What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?

[8] https://www.abs.gov.au/statistics/statistical-geography/interactive-maps

The majority of housing in Australia is currently developed by volume builders. While this model appears to provide multiple options and housing types, the reality is that many of the products delivered by the volume home market are variations on a standard typology, with choices of façade treatments and finishes. The lack of diversity delivered by this business-as-usual model is commented on in the GARP Discussion Paper.

To achieve greater diversity an alternative model for housing delivery is required. Government needs to take a more active role in delivery of social, affordable, and alternative dwelling typologies. Engaging architects to develop a range of well-designed demonstration projects to educate the community and the construction sector regarding alternatives is recommended to promote housing diversity. This would provide home buyers with the opportunity to access a wider range of housing types prior to purchase, which would enable them to appreciate the quality of lifestyle provided through smaller, well-designed homes. This is required to assist in building public confidence in and acceptance of change in housing typologies.

The Institute also recommends that delivery of social and affordable housing be restructured as follows:

- Social housing to be developed by government and social housing organisations, with a requirement that these homes be architect designed and administered during construction to provide quality energy efficient, climate resilient and equitable liveability outcomes. This should include post construction testing.
- Policies developed by the SA Housing Authority be reviewed to ensure that they are not limiting innovation and diversity.
- Development of a suite of architect designed affordable homes for delivery by SAHA, to improve diversity, as-built performance and amenity.
- Development of legislative controls that restrict resale of government subsidised affordable housing to within the affordable price range in perpetuity. This is required to provide an ongoing supply of affordable housing.
- Mandating quotas for affordable housing quotas within private residential developments are required.

While we appreciate that some of these recommendations are not able to be delivered though the GARP, the need for a whole of government approach to development and implementation of the GARP is strongly recommended by the Institute as the only realistic mechanism for achieving lasting and effective change.

3.7 Living Locally

What neighbourhood features enhance living and working locally?

The features that enhance living and working locally are already stated in the GARP Discussion Paper. (p84-87). Regardless of local character and the demographic profile, living locally requires access to population serving employment, active and passive recreation spaces and social infrastructure within a walkable distance. Without this, residents will resort to car transport to meet these needs.

Access to public transport within walking distance is also essential for residents to access facilities that are less feasible to distribute across the urban area. These include hospitals, tertiary education, major cultural and civic facilities, and some employment places.

CASE STUDY – Bowden is a successful example of the living locally concept. It has a range of housing typologies and excellent access to public transport that provides connection to CBD employment, cultural, health care and education opportunities. The development also incorporates local entertainment and green space. However, car use is much higher than anticipated.

When the SA Premier met with the community earlier this year, residents noted that while the supermarket in Plant 4 was easily accessible, there was no chemist, hairdresser, or health care within walking distance, which meant that they drove to access these services. This has resulted in parking congestion and loss of amenity for residents.

Establishing criteria for the core services to be provided within a defined area would address the issues raised by the Bowden case study. These should be defined in the GARP to provide a clear checklist of facilities required within a defined geographical area. Masterplans for strategic infill development and urban village development should be mandated for all major developments and developed in consultation with local Councils and community for established areas.

3.8 Greenfield Development

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

What do you see as the benefits and potential drawbacks of greenfield development?

Greenfield development is not supported in its current form, which results in largely un-serviced, car dependent suburban sprawl. This type of development is counter to the Commission's four outcomes as stated in the GARP Discussion Paper. Greenfield development is only supported in the form of self-contained township development, where services required for new residents are integrated as part of a masterplanned urban form. It is also critical that construction of these service buildings occurs concurrently with residential construction.

What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?

A cluster of urban villages interconnected by public transport around a larger civic centre is recommended for growth across the greater Adelaide region, including satellite cities. This reflects the pre-war, pre-car centric development pattern, which models the living locally concept in the GARP Discussion Paper.

Single zone residential suburban development is not recommended. Outer metropolitan satellite cities tend to populated by people of a lower social demographic profile.[9] Growing these communities in a way that provides poor access to services, education, health care and other facilities without relying on costly private car travel is likely to entrench social disadvantage. This results in ongoing costs to the community and does not support the equity objectives in the Discussion Paper.

The Institute also questions the identification of satellite cities and towns proposed for as development centres. They tend to be located in areas of limited employment, with poor access to public transport and surrounded by Environmental Food Production Areas.

3.9 Infill development

How can infill development achieve an urban form that is consistent with the principles of Living Locally?

Infill development needs to be considered on a location specific basis. The type of infill required to support the principles of Living Locally will be dependent on the nature of the existing development in the immediate area. For example, in areas of residential zoning where car travel is required to access shops and other services this may include identifying areas where small scale retail and population

[9] https://www.abs.gov.au/statistics/statistical-geography/interactive-maps

serving employment need to be established. Areas where older shophouse development still exists may need rezoning to encourage re-establishment of mixed-use occupancy.

However, while each infill opportunity needs to be considered on merit to achieve quality urban form outcomes, it is possible to propose strategies for infill that is suited to existing typologies of development. A set of scenarios to provide guidance for future infill development could be developed for inclusion in the SA Planning System.

This approach should be supported by local design review for any proposal that does not strictly comply with the DTS approval pathway. No amendments, however minor, should be permitted, without performance assessment of the design by an architect. This is required to improve the quality of infill and to raise public confidence.

What do you see as the benefits and potential drawbacks of infill development?

Infill development provides the opportunity to leverage existing infrastructure and community, as well as providing economic benefits over greenfield development. This is acknowledged in the GARP Discussion Paper.

Infill also has the potential to increase the diversity of housing types available in an area. In predominantly residential subdivisions it provides opportunities to improve access to services required to support the living locally concept. Clearly mapping the desired distribution of residences and infrastructure within specific areas of greater Adelaide should be considered to achieve more coordinated infill that supports the Commission's four objectives.

However, current infill development is largely occurring in a haphazard manner. This is not delivering housing diversity and is resulting in a loss of character and urban green cover in many areas. Consideration should be given to restricting subdivision of individual allotments to development proposals which provide an alternative housing type to what is commonly found in the immediate area. This would require subdivision approval to be coupled with development approval for the site.

Where possible infill development of two or more adjacent properties should be considered as this improves opportunities to retain existing character homes and mature trees, while also increasing density. An example of this is provided in Damian Madigan's winning Missing Middle design competition entry, which has been referenced in the 'Raising the Bar on Residential Infill'[10] information booklet. All subdivisions should be subject to design review to improve the quality of infill development. This will improve community confidence and foster align with the objectives stated in the SA Planning Act 2016 and the GARP Discussion Paper.

3.10 Strategic Infill

Where is the next generation of strategic infill sites?

The city of Adelaide has underutilised areas that present significant strategic infill sites. While not as large as those outside the city, the potential for higher density development and the excellent access to services makes these important opportunities for meeting the GARP objectives.

The north-west corner of the city provides the most opportunity, as shown on the map below. Areas shaded blue are sites that are underdeveloped. It includes sites where viable business exist in low rise buildings, which could be incorporated into larger scale, multi-use development. It also includes considerable areas of at-grade car and bus parking, which could also be accommodated within new

[10] https://www.madigan-architecture.com/wp-content/uploads/2021/05/SA-State-Plannign-Commission-Raising-The-Bar-on-Residential-Infill.pdf

development. All sites with heritage listed places have been excluded. The total area indicated for possible development is 65,500m^2 comprising single sites from 500m^2 to consolidated sites up to 9,500m^2.



Base map sourced from SAPPA. Areas shaded blue are potential development sites.
Areas shaded orange are State Heritage places. Areas shaded green are Local Heritage places.

Urban corridor development is also a key opportunity. Sites along urban corridors should be zoned for a minimum building height and mixed-use development. This is essential to maximise the potential of these sites as well as to provide convenient access to retail, healthcare and other services for residents. Consideration should also be given to consolidation of sites along urban corridors to enable a critical mass for development that allows for residential components to have outlook and outdoor space that is separate from the car access or the arterial road. Minimum height requirements, as well as maximum height limits, should be imposed to maximise the effectiveness of development in urban corridors.

The Institute notes that higher density development occurring in areas such as Prospect Road, Unley Road and Norwood Parade are realising the Living Locally principles due to the concentration of new development around existing urban village centres. Development along the Churchill Road, Port Road and Anzac Highway urban corridors is not as successful. These sites have access to public transport but are often not located in walking distance of shops and other services.

Finally, areas with predominantly single storey warehousing, storage facilities and associated open lot car parking should be identified and considered for infill development potential. They provide potential to retain and consolidate similar businesses residential development and supporting services integrated in a mixed-use medium density form. Where they are in inner metropolitan suburbs these sites provide excellent opportunities for master-planned infill development that builds on existing services and

infrastructure located in neighbouring areas. The areas of warehousing currently proposed for redevelopment on Findon Road is an example of this type of strategic development site.

Sites occupied by large retail complexes, especially those with significant areas of at-grade carparking, should also be considered for co-location of residential development. These large-scale retail developments do not support Living Locally principles, and also work against the decarbonisation, liveability and climate impacts and biodiversity loss objectives in the Discussion Paper.

All of these opportunities for strategic infill will require buy in by current landowners. This could be encouraged through identifying potential development areas in the GARP to provide owners with an indication of the development potential and type of development envisioned. Proactively rezoning of such areas where required would provide additional incentive for redevelopment.

3.11 Employment Land

What are the most important factors for the Commission to consider in meeting future demand for employment land?

Employment land needs to be distributed if the living locally concept is to be realised. With the exception of employment that is impactful to the surrounding area, employment needs to be clustered within town centres distributed across the greater Adelaide region. This will provide good access to employment for local residents as well as good access to the services provided by the businesses located in these centres.

Digitisation of workplaces coupled with a growing acceptance of a distributed workforce model should allow many employers to support this more integrated, mixed use zoning model. The Institute believes that this is a more sustainable and healthy future work model than working from home. Working from home is not suited to many forms of employment and is also socially isolating, which is a key cause of poor mental health. Distributed workplaces provide social interaction and support and are conducive to creative work tasks.

The Institute notes that just under 10% of census respondents from greater Adelaide were recorded as working from home in 2022. This is a small number compared to the 70% who drove to work. Satellite cities also have a high proportion of residents who commute to work in the City. In Mt Barker the figure is 60%, due to the lack of local employment opportunities.[11]

It is therefore imperative that residential development is coupled with existing employment opportunities and that employment growth in existing satellite centres is prioritised and confirmed before significant residential growth is commenced. Without these strategies car dependence, carbon emissions and inequity will remain ongoing issues.

What are the most important factors for the Commission to consider in meeting future demand for open space?

Open green space has been clearly demonstrated to have a positive impact on health and wellbeing. The Institute recommends planning for open space as follows:

- Design for landscaped footpaths, and medians for larger roadways, to provide distributed green cover throughout the urban area. In existing areas with limited footpath width, consider one way road networks or restricting on street parking to one side of the road to allow for increased footpath width to enable planting. Alternatively, road ‘arbours’ could provide green cover over the roadway. Street planting should be supported by WSUD.

[11] Learn from Mt Barker. InDaily 6/10/2023

- Designate a minimum area of public green space required per number of dwellings and a maximum distance of a dwelling to one green space. Define minimum dimensions for the green space to ensure that it is usable for passive and small-scale active (a playground and a 'kick of the footy' rather than a full sporting field) recreation.
- Designate biodiversity corridors, including waterways, that are protected from development. These should interconnect to create a framework of natural spaces for plants and animals and to enable residents in greater Adelaide to interact with natural environments. These should provide buffers - or urban breaks as described in the GARP Discussion Paper - between the urban villages distributed across the greater Adelaide region.
- Preserve and enhance existing open spaces such as the Adelaide Park Lands, the Torrens linear park, St Kilda Mangroves. These are important assets and will be increasingly important as our city becomes denser and more populous.

What are the most important factors for the Commission to consider in reviewing and achieving the Urban Green Cover Target?

A vital factor is setting clear, measurable targets for urban green cover based on data that establishes a recognised benchmark. Without a benchmark to measure against, the urban green cover target is largely meaningless. A benchmark is required to review outcomes and to measure the effectiveness of the mechanisms intended to achieve the stated target.

Improving urban green cover targets will require coordinated action by all levels of government and a whole of government approach. Planning for new transport and social infrastructure must deliver positive urban green cover outcomes to complement requirements for green cover in private development.

Consideration of urban green cover at the inception of project feasibility and in masterplanning of large developments is critical to achieving the established targets. Codifying mechanisms for achieving green cover targets – for example, requiring wider landscaped verges supported by WSUD in subdivisions where narrow allotments are proposed – will assist in achieving targeted outcomes.

4. Conclusion

A connected, whole of government approach is required to explore and develop a well-founded, realistic and sustainable framework to underpin the future development of Greater Adelaide. The GARP objectives are broad ranging and have the capacity to bring together the work being done by the other departments in a coordinated, connected way. Without this consistency, South Australia will not achieve the proposed decarbonisation target required to avert the worst impacts of climate change.

The Institute also urges the SA Government to ensure that the GARP is developed in close consultation with allied initiatives including the State Transport Initiative, the Urban Greening Strategy and the Energy Green Paper, all of which are currently in development. The Institute was pleased to hear that discussions were occurring between PLUS and other relevant departments. However, we would like to see more consistent objectives across the reports and a defined strategy for how these related policy initiatives will work together during implementation.

The Institute also advocates for progressive auditing and transparent reporting of delivery against stated objectives and measurable benchmarks. This should be delivered as part of an ongoing public information and education program to promote behavioural change. Achieving buy-in from residents and businesses in Greater Adelaide will allow us to collectively make the changes we need to address the significant challenges we face.

From: [redacted]
To: DTI:PlanSA Submissions
Subject: AILA SA Response - Greater Adelaide Regional Plan Discussion Paper
Date: Tuesday, 7 November 2023 8:42:45 AM
Attachments: image001.jpg
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image006.png
20231106 AILA SA GARP Submission FINAL.pdf

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Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
plansasubmissions@sa.gov.au

Good morning,

Please find attached AILA SA Response to the Greater Adelaide Regional Plan Discussion Paper from AILA SA President – Dr Janelle Arbon.

Thank you for the opportunity to provide a submission to this important consultation process.

Please get in touch if you have any questions or require any further information.

Kind Regards,
Sally

Sally Bolton
AILA SA + NT Chapter Manager
I am based in Tarntanya, Kaurna Country
Australian Institute of Landscape Architects
A Level 1, The Realm | 18 National Circuit | Canberra ACT 2600
W www.aila.org.au | Memberscape | E [redacted]
M [redacted]

// Please note, I work part-time. My workdays are Tuesday 9:00am – 5:00pm, Wednesday 9:00am-5:00pm and Thursday 9:00am – 5:00pm //

I respectfully acknowledge the Traditional Owners of the land on which I live and work, the Kaurna People, and pay my respect to First Nations Peoples and their elders, past, present and emerging.

Australian Institute of Landscape Architects

6 November 2023

Craig Holden
Chair, State Planning Commission
Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan Discussion Paper

Dear Craig,

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA) extends its appreciation to the State Planning Commission to provide feedback on the Greater Regional Adelaide Plan Discussion Paper.

About AILA South Australia

AILA SA leads a dynamic and respected profession, creating great places to support healthy communities and a sustainable planet.

We work together to create healthy communities, connected urban green infrastructure, and liveable, sustainable cities and regions. Our 2,900+ members are driven by AILA's Strategic Plan core values of Connection to Country and Climate Change, and are committed to creating ***'A greener, healthier, inclusive and climate resilient South Australia'*** which is further embedded in our advocacy approach.

The work of South Australian landscape architects is recognised for creating liveable cities, healthy active spaces, and sustainable design outcomes for everyone. Our 200+ South Australian members have helped shape many projects across the State, creating the vibrant community spaces for all.

AILA SA's advocacy

AILA advocates leading positions on issues of concern to our cities, suburbs and regions on matters regarding landscape architecture. We prefer to work alongside government to improve the design, planning and management of the natural and built environment.

Prior to the GARP Discussion Paper release, our principal objective has been to protect and enhance existing South Australia's Significant and Regulated trees and the provision of integrated green infrastructure. As part of our collaborative approach, we have joined with the Conservation Council of South Australia and prepared the following publications:

- Comparison of Australia's Capital Cities Tree Laws (2022)
- Comparison of Australia's Tree Laws (2021)
- Myth Busting Our Trees 2021
- A Call to Action: Protecting Adelaide's Tree Canopy (2021)

Our own Advocacy Manifesto, attached for your information, focuses on positive improvements to protecting, enhancing and creating a more sustainable and inclusive South Australia, including:

1. Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.
2. Protecting South Australia's Trees

3. Improving South Australia's connectivity by creating better streets for people.
4. A new approach to Designing on Country.

We also note there are a range of issues that were heightened during the recent worldwide pandemic, and these include:

- equitable and safe access to quality, local, and green parks and open spaces
- equipping our cities, towns, and regions to be climate resilient in a warming, dry climate
- supporting more people walking and cycling
- authentic and effective reconciliation with First Nations people

Feedback on the GARP Discussion Paper

We held a AILA SA Member Roundtable with a large cohort of our members to prepare our response to the Discussion Paper, which was well attended from all sectors (private, public and education practices). This has informed our submission, acknowledging the two key parts of the Discussion Paper:

1. How should Greater Adelaide grow?
2. Where should Greater Adelaide grow?

Our recommendations for consideration by the State Planning Commission are:

Recommendation 1
Meaningful acknowledgement, engagement and collaboration with First Nations

We recommend that First Nations form an underlying part of the GARP using a Connecting with Country approach.

We recommend a genuine and meaningful partnership promotes positive outcomes, ensuring that future developments are inclusive and respectful of the land, communities, and cultural history, and relevance within our green publicly accessible open spaces.

We recommend an agreed approach to cultural mapping underpin the GARP to ensure the development of growth areas are culturally sensitive, provide environmentally responsible outcomes, and preserve natural systems.

We recommend an authentic and inclusive acknowledgement of traditional owners throughout the GARP, advancing respectful and authentic reconciliation through the design of our places, links to the cities and connection to the regions.

Recommendation 2
Celebrate and represent the context and character of the regions through the development of clear and concise regional Visions

Each region in South Australia is uniquely different, and the GARP could include an agreed and informed character of each region. Our feedback is that development types are not generally applicable across all regions, and what may be appropriate in the northern regions will not be appropriate in southern or central regions.

Therefore, a clear and concise long-term vision over a 15-to-30-year period is required to shape development within South Australia.

We recommend the development of a region-specific visions – incorporating character and context - celebrating the best of the broader Adelaide Plains (celebrating our 'Adelaide-iness') - would ensure high quality and site-appropriate development.

We further recommend that two key questions are posed within the GARP for sustainable long-term growth and to direct how and where Greater Adelaide should grow, which may help with community engagement:

- *what is the future of the regions?*
- *who are the regions for?*

Recommendation 3
Develop a concise, aligned and strategically integrated plan

There is a lack (or apparent lack) of integration across Government department strategies including planning, transport, infrastructure, climate change, greening. The GARP represents an opportunity respond and provide a concise, aligned and strategically integrated plan.

Greater policy alignment and government investment and partnership opportunities with local government could enable greater and high-quality development opportunities along the proposed spines and accommodate for growth within existing corridors and precinct. This would also enable greater density in the inner suburbs - small-scale, low multi storey development (i.e., three-storey apartments), an effective way to increase housing supply and allow space on small blocks for green infrastructure and WSUD.

AILA SA defines green infrastructure (GI) as '...the strategically planned networks of natural and semi-natural areas in urban and regional settlements that provide environmental, social and economic benefits to society... GI strategy aligns with an ecosystems management approach to provide ecosystem services that can be measured, evaluated and deployed at a landscape scale; transcending private and public land, geographic and municipal boundaries.' (Australian Institute of Landscape Architecture (AILA), 2019. Green Infrastructure. Position Statement).

The GARP should embed green infrastructure as an essential component of greener, wilder, healthier, and climate resilient places for all.

We highlight that fundamental change is required in the planning and design of private development that provide greater requirements for protection of existing onsite trees, and mandates practical space for trees of a size than can make a meaningful contribution to the urban canopy cover.

We recommend a key focus of the GARP should be how the interrelationship between government agencies, local government and private development align to deliver improved outcomes for all and therefore support 'living locally' principle within the GARP.

We are not recommending the GARP incorporates every measure and target across government, more alignment of policies and strategies where possible.

Recommendation 4
Provide clear and measurable targets supported by benchmarking

We recommend that the first part of any strategy is a review and analysis of the objectives and targets outlined in past Strategies and how those Strategies have performed to enhance South Australia.

The GARP will guide land use planning and development action over a 15-30 year period, including the integration of land use, transport infrastructure and the public realm and therefore a critical strategy.

Liveability and quality of urban environments correlate to the health, wellbeing and socio-economic prosperity of individuals and communities. Good design outcomes should continue to be an integral driver shaping the future of Greater Adelaide, and precincts and neighbourhoods should be designed holistically, incorporating services, amenities, accessible open and recreational space, civic, residential and commercial areas. This objective – of living locally – requires an integrated planning approach for both infill and greenfield development.

Our exhaustive analysis suggests the following targets are considered, or at least investigated, for inclusion in measuring the success of the GARP (in no particular order):

1. Prioritise infill development and commit to a target of infill housing vs. greenfield housing to provide accountability and provide stronger wording to prevent development in environmentally sensitive or unsuitable areas. Limit the footprint of metropolitan Adelaide.
2. Retention of existing trees, vegetation and environmentally sensitive land should form a critical priority for all new development, as should canopy targets for tree planting on public and private land.
3. Incorporation of connected, quality green open spaces, with a focus on biodiversity, should form a core objective of any new development.
4. The incorporation of mandated green infrastructure targets and standards at all levels of policy, and subsequent inclusion in projects, will provide critical uplift in maximising the benefits of a dedicated green infrastructure investment. There is a new Australian Standard for integration of Urban Green Infrastructure that could be referenced.
5. There is no mention of other greening other than tree canopy targets – the GARP would benefit from targets already established – and we draw attention to the Department for Infrastructure and Transport's Green Infrastructure Commitment which has clear targets that could be applied to new developments.
6. Urban greening targets set by the State Government will not be met with the standards and expectations set out in the Planning and Design Code and the lack of protection provided to existing urban tree canopy. The target for growth set out in the GARP will risk accelerating the decline of the urban tree canopy further, without a more nuanced and site-based approach. Clear felling of existing trees on new development sites is what we are concerned with.
7. The GARP could consider alignment with the Environmental Protection Biodiversity Conservation (EPBC) (1999) Act, which lays out Ecologically Sustainable Development for biodiversity conservation. This could form part of the review of the MOSS as well as protecting existing ecosystems by rehabilitating areas affected by development and avoiding incremental habitat loss is critical to address and ensuring that new communities target biodiversity gain.
8. For key sites, the State Government could take a more active lead in maximising long term outcomes for wider community benefit. The recent leadership demonstrated by Renewal SA with the LeCornu, Forestville site mandated a requirement for 15% open space as part of the site planning. This supports the State's Living Locally and Urban Greening aspirations. In contrast, the sale of Julia Farr site by Renewal SA did not consider any site master planning requirements or strategic aspirations. This may limit the long-term strategic outcomes that could be achieved on the site.
9. Real and measurable walking and cycling targets – ie an active transport strategy that captures the targets in the current strategies – as an embedded requirement for connected communities and reducing car dependency. This could include using the Transport for London's Pedestrian Comfort Guidelines to establish suitable walking infrastructure. The DIT Green Infrastructure Commitment also has a target of 50% tree canopy cover to all walking and cycling paths.

10. Increasing walkability to frequent and high-quality public transport is missing in the GARP. We recommend this is a critical and disappointing omission and must consider integration to ensure social equity as well as environmental and net zero targets are achieved.
11. The State Government has an existing Water Sensitive Urban Design Strategy which has a range of targets that could apply to new developments.
12. Consider increasing the proportion of mixed-use precincts and projects, as well as alternative housing models including minor secondary/ancillary dwellings on existing blocks, rent-to-own and not-for-profit development models, and retrofitting of previously commercial or industrial buildings to create residential or mixed-use precincts and projects.

Recommendation 5
Protect and enhance greening through a core objective of connected, accessible green spaces

A greener, wilder and climate resilient environment is an important aspiration, but concern was raised that current development patterns are the primary cause of loss of green canopy across greater Adelaide.

Without deliberate intervention of State Government, it is likely the directions set in GARP based on the current planning framework will result in a less green and less wilder communities that are significantly impacted by long term climate change.

A more equitable and socially cohesive place is a very broad statement and could be interpreted with a number of values. Creation of strong sense of place through integrated and supported neighbourhoods, should be a fundamental for the GARP. This requires an awareness across Government to work with Councils and developers to invest in the public domain and the creation of spaces for the community, not at the expense of the developer.

We ask for clarity surrounding the timing and integration of the Greening Strategy – this has been on Green Adelaide's agenda for more than 2 years – is this the foundation for the GARP and review of MOSS? We would be keen to understand more noting the Minister is keen on our creeks and rivers as linear parks connecting places, as well as protecting and enhancing biodiversity.

We recommend the GARP establish a maximum walking distance and/or time to quality local open space.

Further, and through the MOSS review, the GARP could establish ecological corridors connected by active transport corridors to underpin the aspiration of living locally?

We note the retention of existing trees, vegetation and environmentally sensitive land should form a critical priority for all new development, as should canopy targets for tree planting on public and private land.

Recommendation 6
Embed principles of connectivity and mobility within the aspiration of Living Locally

Our members unanimously expressed a strong concern at the lack of public transport integration in the GARP, noting the Discussion Paper is basically silent on integrated transport and land use planning.

We remain concerned that connectivity and mobility need to form a key outcome in the GARP, as it will embody the aims of the SPPs, the Commission Chair's message, and the ODASA Principles of Good Design.

For the purposes of the GARP, we recommend connectivity and mobility includes:

- creating development with integrated active transport infrastructure,
- prioritising proximity and connection to existing and planned amenities, open space and services, and
- ensuring adequate public transport options are accessible to all development precincts and projects.

We also note that Infrastructure SA has released a Discussion Paper that is out for comment, and we note with concern that the GARP is not mentioned until p23 of the ISA report. This is at best an oversight and could be an example of a lack of cross government alignment. We are concerned as transport is missing in the GARP and our members agree this is the biggest failure of the GARP.

Within established neighbourhoods, there is greater requirement for the planning of individual sites to accommodate for multiple functions such as provision of shopping and services with a range of housing types. They also require a quality of design and open space planning to ensure they make a positive contribution to the sense of place and encouraging greater connections.

The approach to understanding Infrastructure costs is commended. It is important that infrastructure costs consider wider network requirements rather than development associated costs only. Greater understanding and accountability for road infrastructure projects is required to balance the provision of vehicles and freight, with mass public transport as well as walking and cycling infrastructure. The infrastructure costs should consider the aspiration of the trends, outcomes and living locally principles set out in the discussion paper.

The GARP should recognise these key assets as driver to 'living locally' and reconsider its role in the urban form to bring the vision to life.

Recommendation 7
Reconsider the 'spines' as part of an integrated transport vision

The 'spines' form the core of the GARP, and we recommend there is a rethink on this concept.

It appears the spines revolve around key roads which we believe is outdated thinking and will not achieve the state's net zero targets.

Our members expressed several views that Greater Adelaide must not grow based on a mindset of private vehicles and building bigger roads, it is an unsustainable outcome which compromises or contradicts the principals and directions set out in the discussion paper.

Increased private traffic demand will significantly impact the cost of living for those living further out into regional developments, will significantly increase emissions and accelerate the effects of climate change, and drive further congestion along growth corridors and will become a barrier to 'living locally' aspiration of corridors and infill suburbs.

We believe there is an opportunity to rethink the spines as future integrated public transport hubs – and this could be linked to living locally, and creation of stronger outer suburban centres/villages. When coupled with a review of the state's Greening Strategy and MOSS, the integration and future vision becomes more integrated and cohesive, as well as greener and inclusive.

We further recommend that there is an emphasis for all developer led and infill projects to ensure project planning and scoping of projects creates better streets for people, habitat and biodiversity, as well as new

and existing communities. Moving beyond minimum requirements is the aim - ensuring universally accessible and enjoyable journeys for all are achieved. For example, using the Transport for London 'Pedestrian Comfort Level Guidance' for all state funded infrastructure, health, and education projects place pedestrian comfort at the centre of decision making, to encourage greater walking across our cities and regions

Summary

Our seven strategic and important recommendations are based on many years of active and positive advocacy from AILA and our members across Adelaide and South Australia for improvements to the Planning and Design Code over many years.

I would like to thank you again for the opportunity to meet and discuss our recommendations in person on the 27 October 2023, before lodging this formal submission.

We are looking forward to continuing the discussion surrounding the vision for Adelaide, designing with Country and benchmarking to build better communities.

Yours sincerely,



Dr Janelle Arbon, Fellow (AILA), Registered Landscape Architect
President, AILA South Australian Chapter

Australian Institute of Landscape Architects

South Australian Advocacy Manifesto 2023:
Australian Institute of Landscape Architects Manifesto

'A greener, healthier, inclusive, and climate resilient South Australia.'

Landscape Architects live and work on the lands of Kaurna people, Peramangk people, Ngarrindjeri people, Nukunu people, Narangga people and for all First Nations people across South Australia.

We care deeply and recognise their connection to Country.

We value walking side-by-side with all First Nations people and we acknowledge our role in advancing respectful and authentic reconciliation through the design of our places, cities and regions.

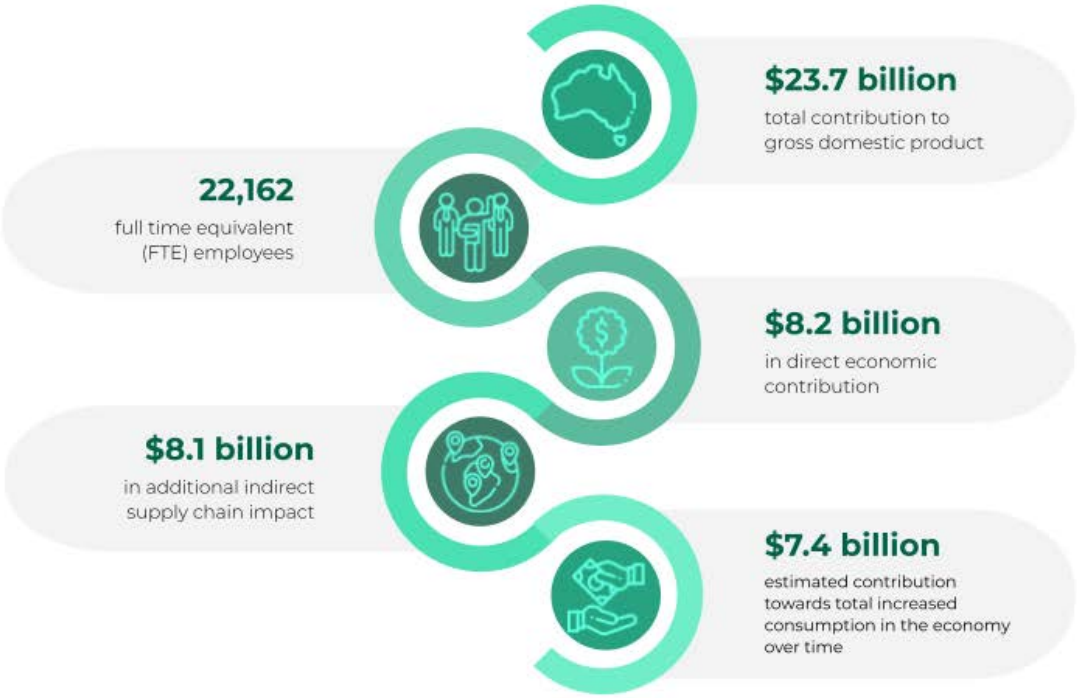


AILA South Australia Advocacy Manifesto

A greener, healthier, inclusive, and climate resilient South Australia

Australian Institute of Landscape Architects

Shaping better places: the contribution* of the profession of landscape architecture to Australia's economy:



Additional benefits of

WELL DESIGNED SPACES

Landscape architects generate additional economic, environmental, social and cultural benefits as a result of their work in the design, construction and maintenance of private and public use spaces.



***** *'Draft Economic contribution of landscape architecture industry report', AILA, 2022 (soon to be released).*

AILA South Australia Advocacy Manifesto

A greener, healthier, inclusive, and climate resilient South Australia

Australian Institute of Landscape Architects

The Australian Institute of Landscape Architects, South Australia (AILA SA) leads a dynamic and respected profession: creating great places to support healthy communities and a sustainable planet.

We work together to create healthy communities, connected urban green infrastructure, and liveable, sustainable cities and regions.

Our 2,800+ members are driven by AILA's values and our advocacy, driven by our Strategic Plan.

Our Values

1. **Climate Positive Design**
   AILA is committed to supporting our members to achieve Climate Positive Design outcomes. **We adapt with our planet.**
2. **Connection to Country**
   AILA is committed to creating an inclusive and knowledge-diverse profession by encouraging cultural awareness of First Nations people across Australia. **We believe in authentic, practical, and genuine reconcilliation.**
3. **Gender Equity**
   AILA Is committed to lead a profession that is inclusive, diverse, and equitable for all. **We believe in equal opportunities.**

Our Advocacy

1. **Healthy Communities**
   We advocate for the role parks and open spaces to support people's physical and mental well-being.
2. **Urban Green Infrastructure**
   We advocate for connected open and green places and spaces to improve social, cultural, economic, and environmental outcomes across Australia.
3. **Liveable Cities and Regions**
   We advocate for the critical role open and green spaces play creating culture, belonging, safety, identity, and liveability in our increasingly dense and globalised cities and regions.



AILA South Australia Advocacy Manifesto

A greener, healthier, inclusive, and climate resilient South Australia

Australian Institute of Landscape Architects

The Australian Institute of Landscape Architects, South Australia (AILA SA), has been advocating and working with South Australian Governments for over 20 years.

We support positive policies, strategies, and projects that achieve our values and advocacy to create greener, healthier, and climate resilent places for all.

AILA SA calls for the adoption of a range of measures to achieve better lives for all South Australians.

Our state-building priorities are a summary of our advocacy over the last two years on a range of issues.

We are seeking support for four positive priorities:

1. **Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.**
2. **Protecting South Australia's Trees**
3. **Improving South Australia's connectivity by creating better streets for people.**
4. **A new approach to Designing on Country.**



A greener, healthier, inclusive, and climate resilient South Australia

1. Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.

1.1. New Green Infrastructure Office

A new single agency with the responsibility to plan, manage, and monitor the design of South Australia's green spaces.

It will have oversight of green aspects of all state-funded infrastructure, health, and education projects to ensure greening targets are initiated delivered, managed, measured, reported and protected over time.

1.2. New State Green Infrastructure Policy

A cohesive green infrastructure policy is developed and owned by the new Green Infrastructure Office with targets and reporting, supporting Green Adelaide and South Australia's Climate Change Action Plan.

1.3. Defined, agreed, and measurable targets

- Minimum tree canopy cover targets - currently 20% in the State's 30 Year Plan for Greater Adelaide
- Minimum tree canopy retention targets
- Minimum targets for new areas of quality green open space
- Minimum targets for stormwater retention, reuse and treatment
- Minimum targets for biodiversity and habitat increase
- All new State Government-funded capital projects must include these targets, form part of their project briefs, and be mandated for delivery
- Builds on the recently announced 'Green Infrastructure Commitment' by the Department for Infrastructure and Transport.

South Australia's leadership in climate change and mitigation must ensure state-funded projects pull their weight - in many instances there is confusion, value management and only passing acknowledgement of state greening targets.

The new agency will positively work with infrastructure, health and education departments to better shape greening outcomes.

2. Protecting South Australia's Trees

2.1. Law reform

Bringing South Australia into line with similar jurisdictions (as outlined in this report) in Victoria and New South Wales by changing the definition of a Regulated tree to one that:

- has a trunk circumference of 1m or more measured 1m above the ground, or
- has a height of 6m or more, or
- has canopy of over 9sqm.

2.2. Remove current exemptions

Remove the series of exemptions to planning regulations introduced in 2011 that allow the removal of mature trees without approval, including the 10m rule and the 20m rule.

2.3. Restore requirements for consultation on Government funded projects

Restore the requirement for the Department of Infrastructure and Transport and the Department for Education (and other relevant government agencies) to conduct consultation and planning approval before the removal of regulated and significant trees.

2.4. Mandate the Tree Offset Scheme to reflect the true value of trees

Mandate and increase the tree offset scheme fees to match the costs that are consequently passed on to Councils to plant, establish and maintain replacement trees, benchmarked against the City of Melbourne's *Tree Retention and Removal Policy*.

2.5. Improve the Planning and Design Code

Increase the number and size of trees required by the Planning and Design Code to be planted in new developments, with penalties or higher offset costs as outlined in 2.4 above.



A greener, healthier, inclusive, and climate resilient South Australia

3. Improving South Australia's connectivity by creating better streets for people.

3.1. Create a new Active Transport Plan

We recommend the creation of an integrated active transport plan, that sets agreed and measurable targets across South Australia, to provide connected, easy to access, and easy to use walking and cycling alternatives to private vehicle use.

This will build on the current State Cycling Plan and Walking Strategy, which are not coordinated and lack clear, cohesive, and agreed strategic and local outcomes.

The active transport plan is to be used as a key input to all state-funded infrastructure, health, and education projects to ensure walking and cycling connectivity is integrated and aligned with more effective public transport.

3.2. Ensure integrated streets

For all state-funded infrastructure, health, and education projects, ensure all project planning and scoping of projects creates better streets for people, habitat and biodiversity, as well as their new and existing communities.

This must be more than simply 'making good' - it means integrating active transport, greening targets, water sensitive urban design, habitat, biodiversity, and develop projects to become 'good neighbours'.

Moving beyond minimum requirements is the aim - ensuring universally accessible and enjoyable journeys for all are achieved.

For example, using the Transport for London 'Pedestrian Comfort Level Guidance' for all state-funded infrastructure, health, and education projects places pedestrian comfort at the centre of decision making, to encourage greater walking across our cities and regions.

4. A new approach to Designing on Country.

4.1. Authentic, genuine and meaningful partnerships with First Nations

Develop a new and collaborative design approach to First Nations involvement on all state-funded infrastructure, health, and education projects.

This must be a process that is funded, and acknowledges the difficulty in making time to meaningfully engage with First Nations.

We recommend new pathways and targets for First Nations Landscape Architects to be employed to help shape better projects and advance reconcilliation in South Australia are included.



AILA South Australia Advocacy Manifesto

A greener, healthier, inclusive, and climate resilient South Australia

Australian Institute of Landscape Architects

Contacts

We would be pleased to discuss any aspect of our positive ideas for a better South Australia.

State Chapter President

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State Chapter Manager

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Relevant Documents

The following South Australian documents are relevant to the priorities outlined in this manifesto:

- South Australia Climate Change Action Plan
- Green Adelaide Regional Landscape Plan
- South Australia Integrated Transport and Land Use Plan
- Principles of Good Design, Office of Design and Architecture South Australia
- Creating Greener Places for Healthy and Sustainable Communities: Ideas for Quality Green Public Space in South Australia, Healthy Parks Healthy People, Government of South Australia
- Green Infrastructure Commitment, Department for Infrastructure and Transport
- Walking Strategy for South Australia
- South Australia Cycling Strategy
- A Call to Action: Protecting Adelaide's Trees
- AILA's Climate Positive Design Position



From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 3:41:50 PM
Attachments: image001.png
AMTA Letter Greater Adelaide Regional Plan Discussion Paper 06 11 23.pdf

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Please find attached a submission from AMTA on behalf of the Mobile Carriers Forum.



Matt Evans
Mobile Carriers Forum
Australian Mobile Telecommunications Association Ltd (AMTA)
Level 5, 50 Berry Street, North Sydney NSW 2060
m: [redacted]
e: [redacted]

This message (including all attachments) is confidential. If you are not the intended recipient and have received this email in error you must not disclose or use the information contained in it. Please notify us immediately by return email and delete the email and its attachments from your system.

6 November 2023

Australian Mobile Telecommunications Association

Department for Trade and Investment
GPO Box 1815,
Adelaide SA 5001
Via Email: plansasubmissions@sa.gov.au

Attention: Growth Management Team, Planning and Land Use Services

Greater Adelaide Regional Plan Discussion Paper – Submission from Mobile Carriers Forum

The Mobile Carriers Forum (MCF) is a division of the Australian Mobile Telecommunications Association (AMTA). AMTA is the peak industry body representing Australia's mobile telecommunications industry. MCF members include Telstra, Optus and TPG Telecom.

AMTA welcomes the opportunity to provide this submission on behalf of the MCF in response to the Department for Trade and Investment's invitation to comment on the Greater Adelaide Regional Plan Discussion Paper.

We note that the Discussion Paper forecasts a need for 300,000 homes over the next 30 years to sustainably provide for this future residential and employment growth and change. Mobile Telecommunications is a critical enabling technology in rapidly growing suburban communities, a point that has recently been recognised by Commonwealth and State and Territory Governments including the South Australian Government. AMTA welcomed the recent Planning Ministers' Meeting 2023 Communique that has identified this matter as a priority. The Communique includes the following:

> *Telecommunications planning*
> *Planning Ministers recognised the need for a coherent approach for prioritising and accelerating planning and approvals for communications infrastructure, especially in rapidly growing suburban communities. The Commonwealth will establish a working group*

alongside a number of state and territory governments to develop options that achieve this goal[1].

On page 69, the Plan draws upon information from Infrastructure Australia when it notes *"Digital technology uptake has increased dramatically, hastened by changes to lifestyle habits during the COVID-19 pandemic. NBN Co, the national wholesale broadband provider, reported record numbers of people used online substitutes for face-to-face interactions, access to health services, education, arts and entertainment. Some 56% of people remained socially connected through video calls. Digital connectivity will play an ongoing role in how people live, move and work. It will support remote working and provide access to social infrastructure and services via digital delivery models".*

We note that the Discussion Paper identifies a need to make provision for a range of services and utilities in growth areas, and we encourage the Commission to include consideration of mobile telecommunications in the plan for Greater Adelaide's expansion. More than ever, all forms of communications networks including mobile networks are viewed as essential, particularly when many Australians continue to work remotely due to the covid-19 pandemic. Networks including 4G and 5G infrastructure and services offer opportunities including for Greater Adelaide's economy, consumers, utilities, for smart cities applications and carbon reduction. In areas earmarked for significant residential growth in Greater Adelaide like the new Master Planned suburb in Hackam[2] there is a need to ensure that mobile network infrastructure can be accommodated when it is deployed to meet demand.

On page 146 under the section 'Employment Lands' the Plan notes *"The planning system plays a critical role in supporting the ambitions of the South Australian Economic Statement to deliver a smart, sustainable and inclusive future, by allocating enough land for current and future industries. A prosperous economy requires us to have employment land that:*
…is appropriately serviced and connected to the world through digital infrastructure, roads, rail, ports and airports". In response, AMTA considers it to be critical to factor in a need for mobile infrastructure and connectivity when planning for 'employment land'. Mobile network infrastructure is a key enabler in activating productivity growth in such land use areas. In 2022, AMTA commissioned Deloitte Access Economics to examine the economic impact of adoption levels of 5G-enabled technologies and innovations, and the policy and regulatory principles required to support accelerated adoption. Deloitte's report '5G Unleashed: Realising the potential of the next generation of mobile technology', contains economic modelling that estimates 5G will increase

[1] https://minister.infrastructure.gov.au/c-king/communique/planning-ministers-meeting-2023-communique

[2] https://renewalsa.sa.gov.au/news/new-master-planned-suburb-headed-for-hackham-following-land-rezoning

Australia's GDP by $67 billion by 2030 based on the current trajectory for adoption, however an additional $27 billion can be realised by maintaining Australia's global leadership position through accelerated adoption – a 40% uplift in economic benefit over nine years.

The Discussion Paper refers to urban infill development and identifies strategic sites. The scale of such development can have a significant impact on capacity of our members' mobile networks. With strategic infill sites like the SA Renewal Thebarton Brewery redevelopment and large-scale CBD developments like the recently proposed Grote and Gouger development, the impact of potentially blocked coverage and on capacity on all mobile networks will need to be considered and assessed. Pit and pipe through the Thebarton and other developments should consider space for fibre connecting mobile small cells in streets and in-building mobile service.

Thank you for the opportunity to comment on the Discussion Paper. Should there be any questions or an opportunity for us to discuss AMTA's submission please do not hesitate to contact me on [redacted] or email [redacted].

Yours sincerely,

[redacted]

Matt Evans
Mobile Carriers Forum,
Australian Mobile Telecommunications Association

DTI:PlanSA Submissions

From: Bill Cowley <[redacted]>
Sent: Tuesday, 31 October 2023 10:13 PM
To: DTI:PlanSA Submissions
Cc: Bill Cowley; [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: BikeAdelaide_GARPresponse.pdf

You don't often get email from [redacted]. Learn why this is important

Please find attached a submission from Bike Adelaide regarding the GARP Discussion Paper.

Regards,

Dr Bill Cowley
for the Bike Adelaide Committee

Bill Cowley
http://lowsnr.org

30th Oct 2023

Bike Adelaide Comments on the GARP Discussion Paper of August 2023

In August 2023 the State Planning Commission released the Greater Adelaide Regional Plan (GARP) discussion paper[1] and requested feedback. This submission provides comments relating to the benefits that would result from a revised approach to urban development and improved cycling infrastructure in the greater Adelaide region over the next few decades.

Adelaide has low density urban development and our transport is highly car centric. In the "Benchmarking Adelaide" report[2], 19 similar cities from different countries were compared. While finding good performance in many categories, Adelaide ranks poorly in many transport-related categories.

Multiple approaches will be required to improve our transport system and must be considered in relation to urban development strategies. The GARP discussion paper does little to change Adelaide's car-centric focus towards public and active transport.

BA supports suggestions from both the Active Living Coalition and the Transport Action Network (TAN), submitted in response to the GARP paper[3],[4]. They include a heavy focus on improved Public Transport. *This submission focuses on urban development strategies which support Active Transport. We summarise the numerous benefits to be gained from this approach.*

Part 1: Urban Development

Doing infill better

GARP speaks to identifying strategic infill development sites near transport services. The opportunities for transport must prioritise walking and cycling for local movements *as well as* public transport services. This means ensuring that paths and trails in these infill developments are integrated with neighbouring areas, allowing easy and direct walking and cycling journeys to, through and within those developments, and between neighbouring areas. Masterplans for these developments should also prioritise clear and direct travel lines towards public transport services. Masterplans should ensure that active transport corridors are not funnelled into major road intersections, where pedestrians and cyclists face the

[1] GARP Fact Sheet available from https://plan.sa.gov.au/__data/assets/pdf_file/0003/1257033/GARP-Discussion-Paper-fact-sheet.pdf
[2] Committee For Adelaide, https://committeeforadelaide.org.au/publications/2023-benchmarking-adelaide-report/
[3] "Greater Adelaide Regional Plan Discussion Paper" from SA Active Living Coalition, 2023
[4] "Public Transport: Ideas for Greater Adelaide", Transport Action Network, 2023

greatest risks to safety and greatest time delays. Modal filters on local streets in these developments should also be a high priority to ensure traffic is calmed and through-traffic is discouraged.

While infill should be prioritised along existing transport corridors (Bus Go-Zones, railways and tramways), the GARP needs to indicate some direction towards how 'spine'/corridor-based developments will be linked, to maximise efficiency, liveability and connectivity. These developments must be made in dialogue with each other, such that there are planning triggers to instigate public transport, walking and cycling connections along strategic corridors between them. For example, should tram services to be extended along Unley Rd or Prospect Rd, the infill development plans should also consider (and prioritise) how those corridors are connected to adjacent/parallel corridors (e.g. Unley Rd with Fullarton Rd or Seaford Railway Line, Prospect Rd with Gawler Railway Line).

Transit Oriented Developments

The GARP makes reference to Transit Oriented Developments (TODs) citing specifically Bowden and Mawson Lakes. The design characteristics of Mawson Lakes are inconsistent with international standard TODs, and despite the presence of train and bus services, and walking and cycling trails, Mawson Lakes has similarly high rates of car ownership and dependency to most other suburbs. Bowden has much lower rates of car ownership and dependency but does not meet the criteria to be classified as a TOD. Walking access to tram services is greatly hindered by large and saturated main roads with long wait times at crossings. Both are examples of Transit Adjacent Developments (TADs) where public transport is nearby but generally poorly integrated. In both cases the train stations are at the extreme edge of the developments and have compromised catchment areas due to the prioritisation of car access, abutments with major road corridors and (for Mawson Lakes) difficult or circuitous path connections.Rather than touting the success of these developments, GARP should cite them as lessons in how to re-approach TODs so that walking and cycling connections to stations is prioritised over car parking, with new civic centres and higher density housing clustered directly around stations. The GARP should look to examples like Subiaco (Western Australia) for successful examples of TODs.

Transport Infrastructure

Despite being dealt with in the Infrastructure SA, 20 Year Infrastructure Plan, transport issues are still central to the planning of land uses in the GARP. Planning based on the anticipation that private cars will continue to dominate the transport system will serve to create car-based planning outcomes without active approaches in the GARP to deal with car-dependency as a *problem* in Adelaide's design typology instead of a *feature* of it.
The GARP cedes that peri-urban development will continue to be mostly car-dependent with little or no public transport provision. This approach appears to be based on an assumption that incremental increases to public transport services will eventually reach these areas and supplement residents' travel needs. This outdated approach to residential planning has clearly demonstrated that low-density, peri-urban areas will rarely generate enough demand for public transport expansion due to low population density in catchments, usually resulting in infrequent bus services that do not meet resident needs.

Bike Adelaide is firmly opposed to suggestions in the GARP that Adelaide should continue to be planned in this manner, and compromise future opportunities to expand public transport services due to unsustainably low population density in inner *and* outer urban areas.

Employment Growth Areas

The GARP places emphasis on high intensity employment growth areas. This stands in comparison to more distributed models with mixed land uses which do not seem to play any notable role in this plan. This has benefits of economies of scale in certain critical infrastructure, but also serves to ensure high concentrations of vehicle movements on road corridors, likely leading to a replication into the future of a need for continuous road expansions and widenings for decades.

The GARP should seek to identify opportunities to more evenly distribute employment areas. This would be consistent with the stated GARP theme of living locally, allowing people to live in local connected networks of facilities, rather than hyper-concentrated employment zones interspersed with low density (nominally car-dependent) residential areas.This approach could also assist with aims to reduce congestion and car-dependency by allowing more opportunities for living and working that can be supported by safe, direct and short walking and cycling journeys.

Part 2: Active Transport

Health Benefits of Active Transport

In assessing the economic benefits of cycling, many studies have used the World Health Organisation's HEAT Model[5] and found that the greatest benefit relates to better health outcomes. A Dutch study[6] found that 27% of all trips are made by bicycle and the health benefits correspond to 3% of GDP. At the other end of global performance, less than 2% of trips are made by bicycle in Australia. A Swedish study[7] examined several cost benefit frameworks and estimated the economic benefits of cycling and walking to be 24 and 66 billion Euros respectively, per year for the EU, compared to the costs of automobile use to be about 500 billion. The European Cyclists Federation made a similar analysis and found even larger benefit ratios. In their case[8], the benefits from longer and healthier lives represented about half the total economic benefit.

Other Benefits of Active Transport

Bicycles are the most energy-efficient form of transport[9]. Consequently they can play an important role in reducing our greenhouse gas emissions. The physics is straightforward: a

[5] Health Economic Assessment Tool (HEAT) for walking and cycling, WHO, see https://www.who.int/tools/heat-for-walking-and-cycling
[6] Fishman E, Schepers P, Kamphuis CB. Dutch Cycling: Quantifying the Health and Related Economic Benefits. Am J Public Health. 2015 Aug;105(8):e13-5. doi: 10.2105/AJPH.2015.302724.
[7] Gossling et. al., 2018, "The Social Cost of Automobility, Cycling and Walking in the European Union", https://doi.org/10.1016/j.ecolecon.2018.12.016
[8] ECF, 2016, see https://ecf.com/policy-areas/cycling-economy/economic-benefits
[9] https://en.wikipedia.org/wiki/Energy_efficiency_in_transport

cyclist is several times heavier than her bike, but a car is about 20 times heavier than its driver.

Apart from physical health and environmental benefits, aerobic exercise such as cycling can improve mental wellbeing, reduce stress and increase motivation. Cycling obviously reduces traffic congestion, pollution from vehicle emissions and traffic noise. The amount of cycling in a city correlates with livability measures. According to one study[10], "six of the top 10 EU countries with the highest quality of life are also among the top 10 EU countries with the largest share of cycling in the total traffic volume. In addition, of the 10 countries with a cycling modal share of 5% or less, 6 are listed as having the lowest quality of life index scores".

Personal Mobility Devices

Aside from the use of traditional bicycles, technology is providing an increased range of Personal Mobility Devices (PMDs) such as electric bikes, scooters and skateboards. These devices still provide some of the health benefits of cycling and walking, while offering greater trip distances in the case of E-bikes and/or more compact mobility aids that may provide increased synergy with public transport. In general they are allowing more of the population to live without cars or drive less. At present in Adelaide it is illegal to use privately-owned PMDs on public roads and paths. Hopefully this situation will soon change[11]. Rather than prohibitions, we need incentives for new modes of Active Transport.

The Way Forward

Due to the low investment in cycling infrastructure in South Australia, our cycling facilities are poor compared to other states and many countries[12]. It is not surprising that many citizens consider cycling on our congested roads simply too dangerous and that parents have increasingly been driving their young children to school rather than encouraging them to cycle. Decades of expenditure on road infrastructure have not reduced congestion. With a mature road network and land use development, there is little opportunity for major new road projects to significantly reduce congestion. Changing modal share via greater use of active and public transport is the only way to meaningfully reduce congestion.

With appropriate funding, huge improvements are possible. In particular, separated cycling infrastructure, such as dedicated cycle tracks, shared cycling and walking paths and segregated cycle lanes, is required. For the greater Adelaide region an integrated plan for public and active transport is needed that aims for multi-modal transport, using the urban5 development strategies outlined in Part 1 of this submission. This might include transport hubs that facilitate the use of bikes and PMDs on public transport networks, the selection of green corridors, parking levies, speed limit reductions and traffic calming, bicycle parking

[10] https://thecityfix.com/blog/using-cycling-as-an-indicator-for-urban-quality-of-life/
[11] https://yoursay.sa.gov.au/personal-mobility-device-use
[12] According to The Greens, SA expenditure of only 0.6% of road spending is less than any other state.

facilities, cycle to work schemes, bike sharing and E-bike grants. Many excellent examples are available[13],[14].

We need a paradigm shift in our approaches towards transport planning in Adelaide over the coming decades. Small changes are unlikely to achieve significant results. For 10 years Norway has adopted a "zero-growth" goal in land-use and transport planning. This states that "all growth in person transport in the larger urban areas is to be absorbed by public transport, bicycling and walking"[15] A policy shift that diverts significant funding from roads to public and active transport, plus a suitable public education campaign would achieve major improvements. Safe cycle infrastructure has been a priority in many EU countries for decades. The time span of GARP is appropriate to make significant changes, but we should start as soon as possible.

We trust you will consider these comments in good faith.

Regards,

Dr. Bill Cowley
On behalf of the Bike Adelaide Committee

[13] "Urban Transport Systems: A Transport Australia Society Discussion Paper" Dec 2021, see https://www.engineersaustralia.org.au/publications/urban-transport-systems-discussion-paper
[14] Gravett et.al., "Assessing the economic benefits of active transport policy pathways", May 2021, https://doi.org/10.1016/j.trip.2021.100456
[15] Tonnesen et. al. "The integration of active travel and public transport in Norwegian policy packages: ...." https://doi.org/10.1016/j.rtbm.2020.100546

DTI:PlanSA Submissions

From: Rebecca Pickering [redacted]
Sent: Monday, 20 November 2023 2:44 PM
To: DTI:PlanSA Submissions
Cc: Craig Holden; Ellis, Morgan (DTI); Megan Miranda
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: CCF SA GARP - 30 year Final.pdf

Some people who received this message don't often get email from [redacted] Learn why this is important

Good afternoon Growth Management Team,

As granted by Craig Holden, on 6 November 2023, please find attached CCF SA's GARP Submission. Thank you again for the extension of time to make this submission, we greatly appreciate this opportunity.

Should you have any questions or concerns please do not hesitate to call or email.

May I ask that you confirm receipt of this email and submission at your earliest convenience ?

Regards
Rebecca Pickering

CIVIL CONTRACTORS FEDERATION SOUTH AUSTRALIA

Rebecca Pickering
Chief Executive Officer | Civil Contractors Federation SA
Executive Director Civil Apprenticeships and Careers Ltd
Kaurna Country
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Representing, Promoting, Connecting the Civil Contracting Industry in South Australia



The Civil Contractors Federation SA acknowledges the traditional owners of country throughout Australia and acknowledges their continuing connection to land, waters and community. We pay our respects to the people, the cultures and the elders past, present and emerging.

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CIVIL CONTRACTORS FEDERATION SA: 30 YEARS GREATER ADELAIDE REGIONAL PLAN SUBMISSION

This submission concerns the Infrastructure and Service section of the GARP discussion paper. Although the paper raises 'ideas' and does not raise any questions relating to infrastructure, CCF SA believes and presents recommendations vital to ensuring that the goals pertaining to the development of Greater Adelaide are realized.

CCF SA believes that pipeline certainty and timing are a genuine high priority.
If the government adopts pragmatic policies and provides ample support, and effective management of both industrial relations and related matters, the matters below will be manageable:

- erratic material expenses
- limited labour market
- inadequate work/projects within roads and utilities sectors
- delays in the provision of products, equipment, and plants, and
- broader cost of living concerns

CIVIL CONTRACTORS FEDERATION SOUTH AUSTRALIA

INTRODUCTION

The CCF SA welcomes the opportunity to provide a submission in response to the Greater Adelaide Regional Plan, Discussion Paper. Our submission is based on research and feedback of our membership including interviews with CCF SA Board members, who are industry representatives from Tier 1, Tier 2, and SME civil contracting companies across South Australia.

ABOUT CCF SA

The Civil Contractors Federation (South Australia) (CCF SA) is the peak industry body representing, protecting, promoting, and connecting the civil construction industry in South Australia. The CCF SA has a growing diverse membership of 500 companies of all sizes that employ up to 50,000 South Australians. CCF SA also has a training arm, Civil Train SA, a Registered Training Organisation (RTO), that delivers nationally accredited and non-accredited training in South Australia, Western Australia, and the Northern Territory, to at least 15,000 people annually.

Civil contractors are at the heart of designing, constructing, and maintaining our physical infrastructure, including essential public works such as roads, railways, bridges, dams, airports, drainage and sewerage systems, pipelines, structural components of buildings, and community facilities. They provide crucial support services and access for the liveability of the community, making civil contracting the second-oldest engineering discipline after military engineering. Civil contracting covers both the public and private sectors, ranging from municipal to national governments and individual homeowners to international companies. Members are also involved in the preparatory works for mining and other resource developments.

The CCF SA works towards advocating the development of built infrastructure for economic, social, and environmental growth. It seeks to influence government policies, regulations, and resource allocation to benefit and sustain the civil contracting industry and the community.

Date – 20 November 2023
This submission has been prepared on behalf of the Civil Contractors Federation South Australia by:

Rebecca Pickering
Chief Executive Officer and Executive Director Civil Apprenticeships and Careers Ltd
CCF SA South Australia
1 South Road, Thebarton SA 5031
E: [redacted]

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A LETTER TO THE COMMISSION CHAIR

Dear Craig,

The CCF SA welcomes the opportunity to provide a submission in response to the Greater Adelaide Regional Plan (GARP), Discussion Paper. Our submission is based on research and feedback of our membership including interviews with CCF SA Board members, who are industry representatives from Tier 1, Tier 2 and SME civil contracting companies across South Australia.

The Civil Contractors Federation SA stands in support of a strategic approach to infrastructure in South Australia that incorporates wider planning objectives and pre-existing long-term strategies.

The CCF SA acknowledges the efforts and justification in drafting the GARP and welcomes the opportunity to provide constructive feedback. We strongly believe that reviewing the current position is necessary and that the outcomes resulting from this discussion paper have the potential to create better outcomes for our state of South Australia.

To achieve this, it is crucial for the government to ensure that the authorities using the GARP to create infrastructure planning policies take a holistic approach and maintain a balance between economic and social factors. A robust system developed with sufficient rigour can eliminate unnecessary regulatory barriers for both industry and the community. Such a system should be reasonable for industry to comply with and manageable for regulators to apply.

CCF SA is encouraged by the paper's commitment to challenging cost/benefit outcomes of any proposed changes and accomplishing sensible yet needed infrastructure planning provisions that align with the State's affordability.

The civil industry is presently managing various challenges and is determining how we can best deliver the Government projects with minimal cost increases and within set timeframe.

CCF SA believes that pipeline certainty and timing is a genuine high priority. If the government adopts pragmatic policies and provides ample support, effective management of both industrial relations and related matters, the matters below will be manageable:

- **erratic material expenses**
- **limited labour market**
- **inadequate work/projects within roads and utilities sectors**
- **delays in the provision of products, equipment, and plants, and**
- **broader cost of living concerns**

South Australia's ability to build infrastructure and its prosperity is dependent upon functional, efficient, and cost-effective civil infrastructure. Healthy, well-functioning and productive States depend on infrastructure that civil contractors construct and maintain.

To reduce pressures on the civil industry, far greater planning and reliability are required to support civil infrastructure needs. An infrastructure planning portal must be established to complement the existing planning portal; this will provide the civil industry confidence and understanding of GARP infrastructure needs and plans. This submission aims to clarify our position on the topics covered in the GARP.

We encourage the government to adopt a bilateral approach in reaching a resolution, with the administration processes used to enact outcomes reviewed conjunctively with objectives/targets set under the GARP.

In terms of implementation, it is essential that the GARP recommendations are supported by strong public sector procurement practices. This will ensure civil contractors can compete in transparent and consistent protocols to secure contracts. Moreover, to capitalize on the employment and growth potential in the civil construction industry, it is necessary to accelerate infrastructure project initiation and create a steady stream of work for local South Australian businesses, thereby enhancing their capability and capacity.
South Australia is presented with a unique opportunity to lead the way in infrastructure development by leveraging its comparative strengths and advantages. This requires the elimination of hindrances and fostering of innovation.

CCF SA urges the creation of new policies that optimise infrastructure outcomes, efficiency, and value for money. We need to be innovative and responsive to opportunities to enhance our economic growth and liveability.

This document specifically responds the following section of the GARP: Infrastructure and Service

I look forward to discussing this submission and ongoing GARP development with you.

Regards
Rebecca Pickering

BACKGROUND

Over the past decade, the Greater Adelaide region has experienced a modest influx of 167,000 new residents, a growth rate lower than that of other Australian capital cities. However, future projections indicate that the region could see a surge of 670,000 additional people by 2051, necessitating careful planning to ensure that this growth is adequately accommodated. With decisions around population growth and job creation proving to be intricate, addressing these questions will be critical in formulating the Greater Adelaide Regional Plan (GARP).

In order to create a dynamic and inclusive plan for the future, it is imperative to seek input from our communities. This consultation process will be the driving force behind the development of the GARP. The recently released Discussion Paper provides the necessary tools and information for industries and communities to share their ideas and engage in constructive conversations.

The Discussion Paper sheds light on the critical role that our planning system will play in addressing complex issues, including social equality, housing affordability, and climate change. It is our hope that this Discussion Paper will serve as a catalyst for constructive debate and a collaborative effort to shape the future of the Greater Adelaide region.

The Discussion Paper will guide a collaborative process to develop the new plan. The Discussion Paper is divided into two core parts.

1. ***How should Greater Adelaide Grow?***
2. ***Where should Greater Adelaide Grow?***

What is the Greater Adelaide Regional Plan and what happens to the 30-Year Plan for Greater Adelaide?

The Greater Adelaide Regional Plan (GARP) will determine how urban growth will be managed over the next 30 years by investigating and guiding:

- *where houses and employment land will go*
- *how housing and population will be serviced*
- *which areas need conservation and protection*
- *what infrastructure is needed and how it will be provided.*

The GARP will replace the 30-Year Plan for Greater Adelaide. Several economic and demographic changes have occurred since the inception of the 30 Year Plan in 2010. A significant portion of planned future growth areas have been developed or have commenced activity that will lead to future development.

In answer to the questions posed:

1. How should Greater Adelaide Grow?
2. Where should Greater Adelaide Grow?

This submission concerns the Infrastructure and Service section of the GARP discussion paper. Although the paper raises 'ideas' and does not raise any questions relating to infrastructure, this submission aims to identify essential recommendations that CCF SA deems necessary for facilitating the desired outcomes regarding the growth of Greater Adelaide, including where and how it should occur.

It is clear that without a robust and supportive civil industry, it will be difficult to deliver proposed plans and solutions proposed in response to GARP questions.

SUMMARY OF RECOMMENDATIONS

RECOMMENDATION 1 – It is recommended that the Civil Contractors Federation SA is added to the Minister Liaison Group which has been established to support GARP engagement. This will allow for representation of infrastructure contractors in future and ongoing planning and program forums. Our aim is to share industry intel to benefit all parties involved.

RECOMMENDATION 2 – Following the completion of the Federal Government's 90-day review and the subsequent release of a new Infrastructure Policy, it is crucial that steps are taken to prevent similar reviews from happening in the future. To achieve this, the national Infrastructure Investment Program (IIP) must be carefully designed and effectively implemented.

RECOMMENDATION 3 – New funding frameworks must be implemented, and projects should not be tendered unless the funding has been secured. Exploration and implementation of inventive funding approaches that include reimbursement or compensation opportunities are necessary to secure private or alternative financing for public infrastructure projects.

RECOMMENDATION 4 – CCF SA endorses the infrastructure 'ideas for the GARP' proposals put forth. The inclusion of social and sustainability priorities should be extended to infrastructure ideas. CCF SA seeks ongoing and active engagement to support GARP infrastructure ideas.

RECOMMENDATION 5 – Facilitate the expansion of satellite cities by effectively leveraging the support of both existing and planned infrastructure.

RECOMMENDATION 6 – To ensure continued growth of the civil infrastructure workforce, it is crucial to prioritise education and skills development, ensuring that civil industry capacity and capability are effectively built and supported.

RECOMMENDATION 7 – Build and implement a GARP infrastructure forward work plan that is reliable and published via a live, dynamic portal that contractors and the community can trust.

RECOMMENDATION 8 – Build and implement a GARP infrastructure maintenance work plan that is reliable and published via a live, dynamic portal which contractors and the community can trust.

RECOMMENDATION 9 – Enhance the efficiency of project planning in Public Agencies, with the aim of bringing projects to the market quicker and with greater quality.

RECOMMENDATION 10 – Ensure the new Infrastructure Planning and Development Unit (IPDU) has the resources, budget, and power to deliver its objectives. Related forward works plans driven by the IPDU must be transparent and communicated readily (refer recommendations 7 & 8).

RECOMMENDATION 1 – It is recommended that the Civil Contractors Federation SA is added to the Minister Liaison Group which has been established to support GARP engagement. This will allow for representation of infrastructure contractors in future and ongoing planning and program forums. Our aim is to share industry intel to benefit all parties involved.

Referring to the State Planning Commission's *'Proposal to initiate the preparation of Greater Adelaide Regional Plan, Preparation of Greater Adelaide Regional Plan, By the State Planning Commission (the Designated Entity)'* document, *ATTACHMENT C "List of Previous Engagement for the Region".*

The attachment lists several peak industry bodies who together form a Minister's Liaison Group. This group has been established since early 2022 and will continue throughout the program, the extract is as follows:

> *Minister's Liaison Group Regular updates provided to the Minister, Chief Executive and representatives from peak industry bodies on the progress of the regional plan program. The group meets with senior PLUS staff on a quarterly basis.**
>
> *All Representatives from peak industry bodies:*
> - *Housing Industry Association*
> - *Master Builders Association of South Australia*
> - *Property Council of Australia*
> - *Urban Development Institute of Australia*
> - *Planning Institute of Australia (SA)*
> - *Australian Institute of Architects (SA)*
>
> **Since early 2022 and expected to continue throughout program.*

CCF SA respectfully seeks inclusion in the aforementioned list/forum to ensure recognition of the infrastructure contractors and their contributions to GARP. The civil industry brings valuable input to enhance infrastructure construction efficiency and productivity through our expertise in project planning, procurement, mobilisation/demobilisation, and construction methodology. The ultimate aim is to share industry intel to benefit all parties involved.

RECOMMENDATION 2 – Following the completion of the Federal Government's 90-day review and the subsequent release of a new Infrastructure Policy, it is crucial that steps are taken to prevent similar reviews from happening in the future. To achieve this, the national Infrastructure Investment Program (IIP) must be carefully designed and effectively implemented. Explore ways to fund key projects that were cut due to the 90 Day review.

The 90-Day Review, commissioned by the Australian Government on May 1st, 2023, had a negative impact on the civil sector. This review was conducted to analyze the Infrastructure Investment Program and its effectiveness, but unfortunately resulted in the loss of key projects and a decline in contractor confidence due to the pause on projects. While some projects were positively retained, the significant impact on the civil sector indicates that a better infrastructure investment plan (IIP) must exist and be maintained to ensure such reviews do not occur in the future.

"The Australian Government is committed to delivering a pipeline of land transport infrastructure projects that is sustainable, aligned to market capacity and comprised of nationally significant projects. In recent years, the Infrastructure Investment Program (IIP) has drifted away from a focus on projects of national significance. In addition, current market capacity issues and an inflationary environment have created budgetary pressures and deliverability challenges for infrastructure projects across the nation. In light of this, the Government commenced reviewing the IIP in the October 2022–23 Budget. While a number of projects were cancelled or deferred, further reform of the IIP is necessary to ensure a credible and sustainable pipeline of projects.

The Government has decided to maintain its commitment to an infrastructure investment pipeline of $120 billion over 10 years to provide certainty to the market and ensure a rolling program of sustainable investment. However, the Government is commissioning an independent strategic review of the IIP. The review will be undertaken by Mr Reece Waldock AM, Ms Clare Gardiner-Barnes and Mr Mike Mrdak AO.

The review will ensure that federally funded infrastructure projects meet government policy objectives and deliver benefits for Australians. The review is not designed to consider projects already under construction nor will it consider the Commonwealth's 2022 election commitments."

CCF SA diligently advocates for a diverse range of members, including both large and small companies. It is with great pride that CCF SA acknowledges the impressive growth and development of members and the industry at all tiers, particularly in terms of their enhanced self-performance capabilities and ability to tackle increasingly complex projects. CCF SA members at Tier 1, 1.5, 2, and 3 have demonstrated an unwavering commitment to their ongoing improvement and success.

South Australia's economic growth and success depend heavily on productive infrastructure and resolving the issues associated with increasing population and housing requirements. To address current difficulties, it is necessary to increase the productivity of the state and upgrade essential infrastructure. Collectively, we need to investigate more than just the total infrastructure spend so we avoid a '2 speed' scenario, where those parts of the industry working on major projects are working furiously, but with inflating costs the rest of the industry would struggle to sustain their investment in people if the pipeline of work is not certain or consistent.

Failure to keep critical infrastructure projects entering construction will cause project bank up. Where this occurs a number of significant projects could be released at once driving up the cost of labour, materials, subcontractors. For instance; Hydrogen, NWCH, Tunnels, Aukus will require more than the current available workforce meaning projects such as Road Maintenance, Residential Housing, Renewables, Resources and Private development would be impacted.

South Australia must make progress to improve infrastructure connectivity, repair damaged roads, and create new railway lines for increased line capacity. To improve The State and Federal Governments must also work on improving roads that line crucial supply routes, as well as expanding transport and freight services across the State. This will allow South Australia to benefit from potential resources, agricultural, and food processing advancements in the future.

The GARP should consider how key projects lost through the 90 Day review may funded to facilitate their activation and completion:

- Truro Bypass
- Hahndorf Traffic Improvements
- Main South Road Productivity Package

RECOMMENDATION 3 – New funding frameworks must be implemented, and projects should not be tendered unless the funding has been secured. Exploration and implementation of inventive funding approaches that include reimbursement or compensation opportunities are necessary to secure private or alternative financing for public infrastructure projects.

There is a growing hindrance which lies in the infrastructure that governments (Federal, State and Local) plan and finance.

The financial challenges across South Australia have led to a reduction in the capacity of government to allocate spending from various funding streams towards infrastructure investment. As the population continues to age, the pressures on this situation will become even more demanding in the long term.

The solutions for this issue entail an increased usage of private investment, new funding and financing models by the government, and perhaps unpopular user charges. Fortunately, private capital is readily available to invest in public infrastructure that is productive, provided the funding and financing models are correctly established.

A robust pipeline of well-designed and adequately funded public infrastructure projects and enabling mechanisms for private investment is necessary.

As government consider their own contributions towards funding, they should also explore all other options for infrastructure users and beneficiaries to pay.

To fund infrastructure investment in the future, South Australia may explore innovative approaches in managing their budget and balance sheet. A strategic emphasis on developing more efficient infrastructure markets would prove beneficial, particularly if the government's capacity to fund infrastructure is constrained and private sector participation is required.

It is imperative that an open and honest dialogue is had with the community, where any move towards greater private infrastructure investment and increased user charging for cost recovery is likely. This dialogue must focus on educating and gaining widespread acceptance of the benefits of such a shift in infrastructure financing policies. Moreover, these policies must tackle the obstacles preventing private investment from emerging sources like superannuation funds.

As capital markets evolve, they must enable more private investment in infrastructure debt and equity to meet investor demand. This is particularly important for sectors like the fast-growing self-managed superannuation fund sector. To reduce the pressure on public funding for infrastructure, governments must explore ways to optimise the use of existing infrastructure and defer the need for investment in new assets. One way to do this is by removing unnecessary regulatory restrictions on the use of infrastructure.

Such strategies should be incorporated into government infrastructure plans, especially when analysing the costs and benefits of different options for servicing higher levels of infrastructure demand.

While not directly related to the GARP, CCF SA suggests that developers should not bear the burden of delivery costs for main infrastructure without some form of compensation or financial return/reimbursement. CCF SA fears that increasing developer risk and costs will impede investment in South Australia and may generate further up-front charges and levies which will decrease housing affordability.

Another key area to address is the high cost of new infrastructure project construction in South Australia. The high cost of provision erodes the value of both private and public investment and diminishes the economic and social returns to the community. There is opportunity to reduce project costs by: improving quality of project management and project design, reforms to ensure a more productive workplace relations system, and reforming Australia's project approvals\activation systems to reduce costs and uncertainty for all project proponents.

Possible solutions which should be investigated:

- Produce a consistent pipeline of high-quality public infrastructure projects initiated by Federal, State and Local governments;
- Implement a program to recycle funds and obtain operational efficiencies from privatising infrastructure assets;
- Develop and define the funding roles and accountabilities of the Federal and State governments;
- Match new funding and financing models to projects;
- Improve and make greater use of Public–private Partnerships (PPPs);
- Develop capital markets by growing demand for project debt;
- Address the taxation treatment of long-lived infrastructure investments;
- Develop markets, private investment and adopting user-pays;
- Improve use of existing assets.

RECOMMENDATION 4 – CCF SA endorses the infrastructure 'ideas for the GARP' proposals put forth. The inclusion of social and sustainability priorities should be extended to infrastructure ideas. CCF SA seeks ongoing and active engagement to support GARP infrastructure ideas.

The GARP discussion paper identifies the following infrastructure 'Ideas for the Greater Adelaide Regional Plan'; the following is supported by CCF SA where it also seeks ongoing and active engagement across ideas detailed:

> ***Infrastructure in Established Areas***
> *In established areas, focus growth on locations with existing infrastructure capacity, or in locations where infrastructure can be planned and augmented in a cost effective and orderly manner:*
> - *Prioritise strategic infill sites, which are usually more economic to service than general infill;*
> - *General infill will play an ongoing role for housing supply but the focus will be on locations where there is capacity in infrastructure networks;*
> - *Investigate the use of infrastructure schemes to establish developer contributions for infill and regeneration areas.*
>
> ***Infrastructure in Greenfields Area***

Carefully plan and sequence growth and infrastructure to ensure timely access to services and amenities for new communities:

- *Build on existing infrastructure capacity in townships, where local councils have identified growth opportunities;*
- *Prioritise the orderly expansion of existing urban areas and satellite cities, where this builds on existing services and infrastructure, or where we can provide efficient augmentation/infrastructure delivery;*
- *New master planned communities, not connected to an existing area, will play an important role in future growth but they will:*
  - *incur greater community costs due to the delivery of new trunk infrastructure;*
  - *require careful planning to ensure infrastructure can be provided and funded in a timely fashion;*
  - *funding mechanisms established to facilitate appropriate provision of amenity and services.*

Infrastructure, Social and Sustainability

With regards to infrastructure 'ideas' social and sustainability procurement must be considered here also. Within GARP question 'how should Greater Adelaide grow?' to questions should be extended to include infrastructure:

- What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?
- What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?

The Federal Government's recently released Infrastructure Policy places significant emphasis on social and sustainability elements as top priorities. To achieve meaningful progress in these areas, it is imperative that the state's procurement assessment be both transparent and clear with regards to non-price weightings and innovation assessment. Industry tenders should be scored accordingly and efficiently to promote the speed of innovation and objective achievement while managing costs.

RECOMMENDATION 5 – Facilitate the expansion of satellite cities by effectively leveraging the support of both existing and planned infrastructure**.**

CCF SA supports the growth of satellite cities and encourages the utilisation of existing transportation infrastructure to facilitate this expansion, as outlined in the GARP. However, any new major transportation projects must have government backing. Infrastructure proposed within master-planned developments must be a shared responsibility between all stakeholders, including government and consumers.

While satellite cities are a worthwhile initiative, the time required for their establishment should be taken into consideration. Supporting infrastructure construction must start in earnest.

RECOMMENDATION 6 – To ensure continued growth of the civil infrastructure workforce, it is crucial to prioritise education and skills development, ensuring that civil industry capacity and capability are effectively built and supported.

To ensure a competent workforce capable of meeting future infrastructure demands, it is imperative that government policy aligns with commitments to promoting employment and training in the civil industry.

CCF SA recommends investing in training for anticipated skills shortages in Infrastructure modelling as a means of improving productivity. While this may prove to be a challenge at present, relying solely on industry to hire the necessary labor is not a viable solution. While government-led skills funding can only go so far, South Australia could gain a considerable advantage by proactively addressing this issue and positioning itself as a leader in productivity and sustainability. The potential benefits are substantial and should not be overlooked.

The civil infrastructure industry must be supported to ensure Government housing plans can be delivered; it is the civil sector that undertakes subdivision and land development activities.

In order to achieve GARP goals, it is imperative that local companies receive ongoing government support to develop the skills and expertise of their workforce. The State Government's Department for Innovation and Skills must work in tandem with the private sector to provide training programs, such as apprenticeships and graduate programs, to build a competent workforce capable of meeting future infrastructure demands. Such initiatives will serve to bolster the workforce, enhance employment prospects, and contribute to the overall growth and prosperity of the region.

Civil Apprenticeship Gender Diversity[1] – Highlights, 2016 to 2021 Certificate III Civil Commencements

Civil Construction Certificate III leads with the highest percentage of workforce identifying as female, in comparison to traditional trades of Carpentry, Plumbing and Electrotechnology

- Nationally, the following identify those undertaking a Certificate III who identify as female (average percentage):
    - 5.3% of Civil Construction (including Plant Operations)
    - 4.6% of Electrotechnology Electricians
    - 1.4% of Carpentry (including Joinery)
    - 0.6% of Plumbing

South Australian Largest Civil Apprenticeship – Highest female employment of all trades

- Civil Construction was only declared as a Trade in South Australia in 2019; this has further increased worker numbers and percentages within South Australia
- Civil Apprenticeships and Careers Ltd (CACL), a dedicated Group Training Organisation which only employs Civil Construction Apprentices, reports:
    - 74 total Civil Apprentices employed.
    - 11 are female apprentices

[1] Source. NCVER 2022, Apprentices and trainees 2021 - September quarter DataBuilder, Contract status, State/territory, Qualification name by Year, Quarter, Gender. Numbers are rounded to the nearest 5. A dash represents a true zero. Categories are not displayed if no data are available. Filters applied: Qualification name: 16 of 1696

State/territory	(All)

Row Labels	Sum of Total Females	Sum of Total Males	Total Workforce	% Female
Certificate III in Carpentry	945	49435	50380	1.88%
Certificate III in Civil Construction (incl Plant Ops)	990	13355	14345	6.90%
Certificate III in Electrotechnology Electrician	1600	38090	39690	4.03%
Certificate III in Plumbing	285	24665	24950	1.14%
Grand Total	**3820**	**125545**		

State/territory	Qualifications	Total Females	Total Males	Total	Percentage Female
ACT Total	Certificate III in Carpentry	55	1695	1750	3.14%
QLD Total	Certificate III in Carpentry	220	10175	10395	2.12%
SA Total	Certificate III in Carpentry	30	2330	2360	1.27%
NT Total	Certificate III in Carpentry	5	390	395	1.27%
VIC Total	Certificate III in Carpentry	305	15225	15530	1.96%
WA Total	Certificate III in Carpentry	40	2240	2280	1.75%
NSW Total	Certificate III in Carpentry	290	17255	17545	1.65%
SA Total	Certificate III in Carpentry	0	75	75	0.00%
TAS Total	Certificate III in Carpentry	0	50	50	0.00%
WA Total	Certificate III in Civil Construction (incl Plant Ops)	110	1060	1170	9.40%
VIC Total	Certificate III in Civil Construction (incl Plant Ops)	220	2160	2380	9.24%
NSW Total	Certificate III in Civil Construction (incl Plant Ops)	195	2185	2380	8.19%
QLD Total	Certificate III in Civil Construction (incl Plant Ops)	440	6675	7115	6.18%
NT Total	Certificate III in Civil Construction (incl Plant Ops)	10	205	215	4.65%
SA Total	Certificate III in Civil Construction (incl Plant Ops)	10	280	290	3.45%
ACT Total	Certificate III in Civil Construction (incl Plant Ops)	5	375	380	1.32%
TAS Total	Certificate III in Civil Construction (incl Plant Ops)	0	415	415	0.00%
NT Total	Certificate III in Electrotechnology Electrician	45	475	520	8.65%
TAS Total	Certificate III in Electrotechnology Electrician	55	755	810	6.79%
WA Total	Certificate III in Electrotechnology Electrician	315	4890	5205	6.05%
ACT Total	Certificate III in Electrotechnology Electrician	95	1560	1655	5.74%
NSW Total	Certificate III in Electrotechnology Electrician	575	15140	15715	3.66%
VIC Total	Certificate III in Electrotechnology Electrician	420	12005	12425	3.38%
SA Total	Certificate III in Electrotechnology Electrician	95	2950	3045	3.12%
QLD Total	Certificate III in Electrotechnology Electrician	0	315	315	0.00%
VIC Total	Certificate III in Plumbing	195	11800	11995	1.63%
TAS Total	Certificate III in Plumbing	5	365	370	1.35%
NSW Total	Certificate III in Plumbing	65	8325	8390	0.77%
SA Total	Certificate III in Plumbing	10	1375	1385	0.72%
ACT Total	Certificate III in Plumbing	5	900	905	0.55%
WA Total	Certificate III in Plumbing	5	1570	1575	0.32%
NT Total	Certificate III in Plumbing	0	205	205	0.00%
QLD Total	Certificate III in Plumbing	0	125	125	0.00%

First Nations[2] – Highlights, 2016 to 2021 Certificate III Civil Commencements

- Civil Construction employs the greatest number of First Nation apprentices in comparison to Carpentry, Electrotechnology Electrician and Plumbing;
- 43% of Civil Construction Cert III Apprentices\Trainees identify as First Nation;
- Western Australia leads First Nation Civil Construction Cert III commencements at 50%.

Row Labels	Sum of First Nations	Sum of Other	Total	Percent First Nations Cert IIIs
Certificate III in Carpentry	2315	6795	9110	25%
Certificate III in Civil Construction (incl Plant Ops)	1495	2020	3515	43%
Certificate III in Electrotechnology Electrician	1635	6715	8350	20%
Certificate III in Plumbing	1150	5060	6210	19%
Grand Total	**6595**	**20590**		

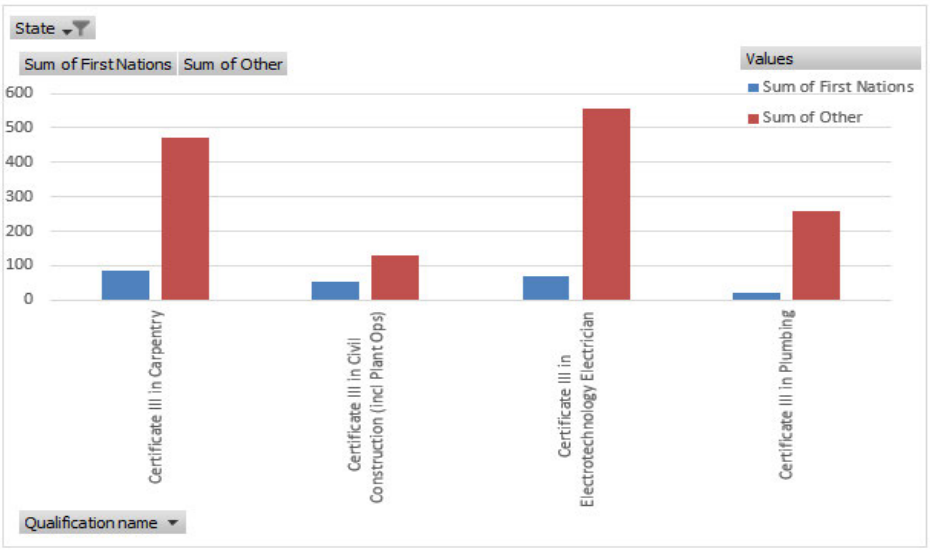
[2] Source: NCVER 2022, Apprentices and trainees 2021 - September quarter DataBuilder, Contract status, Workplace state/territory, Qualification name by Year, Quarter, Indigenous status, Numbers are rounded to the nearest 5. A dash represents a true zero. Categories are not displayed if no data are available. Filters applied: Qualification name: 15 of 1696

South Australian Highlights, First Nation

- 30% of Cert III Civil Construction Apprentices identify as First Nation\Indigenous;
- Civil Construction was only declared as a Trade in South Australia in 2019; this has further increased worker numbers and percentages within South Australia.

State	SA Total

Row Labels	Sum of First Nations	Sum of Other	Total	Percent First Nations Cert IIIs
Certificate III in Carpentry	85	470	555	15%
Certificate III in Civil Construction (incl Plant Ops)	55	130	185	30%
Certificate III in Electrotechnology Electrician	70	555	625	11%
Certificate III in Plumbing	20	260	280	7%
Grand Total	**230**	**1415**		



RECOMMENDATION 7 – Build and implement a GARP infrastructure forward work plan that is reliable and published via a live, dynamic portal that contractors and the community can trust.

STRATEGIC PLANNING AND DELIVERY

A long-term pipeline of guaranteed funded infrastructure projects is needed to encourage further private investment, and to provide greater certainty to South Australian businesses. This requires a bipartisan, holistic approach to infrastructure planning and investment to support a long-term pipeline of work, with careful consideration needs to be given to effective policy tools and institutional support to the development of projects.

Planners within government have failed South Australia in efficient infrastructure development to meet forecast demand, delivering too little too late with non-integrated piecemeal engineering solutions, rather than one common engineering platform in the eastern states of Australia.

As stated by the OECD (2018), "…a pipeline can only be as robust as the investment-ready and bankable projects that constitute it, as effective as institutions that deliver it and as ambitious as the objectives to which it is linked." OECD (2018) Developing Robust Project Pipelines for Low-Carbon Infrastructure, November 2018.

Therefore, a reliable pipeline of projects must involve the following:

- integrated and robust strategy, planning, business cases and financing/funding;
- promotion and investment in 'good projects' that are fit for purpose and provide maximum economic, social, and environmental benefit;
- project scopes and function aggregated across a variety of sectors for wider economic benefit;
- mature capability and capacity to convert strategy and objectives into well-defined programs and projects.
- different scales, and delivery in logical construction classes;
- segmented procurement and tenders of infrastructure projects into logical contracts;
- accommodation to meet the requirements of investors and the available market capital.

The government announced $24 billion in infrastructure projects over the next several years outlined in the 2023/24 State Budget are strongly supported by CCF SA. These projects will increase jobs and provide stimulus to the economy. Unfortunately, the announced budget figure also includes the Department for Infrastructure and Transport annual operational budget figures and most of the announced investment will occur over a number of years, in some instances the project construction phase is not scheduled to occur for up to ten years.

STATE BUDGET UNDERSTANDING

Department Infrastructure and Transport

South Australia's State Budget was delivered Thursday, 15 June 2023. Although the long-range commitments look positive at $24.7 billion, up from last year's $18.6 billion, the short-term looks far less impressive.

With the GARP discussion released, the Federal Government's 90-Day Infrastructure Review become even more critical to our industry as several projects detailed in the budget are at risk of further reprofiling (delays) or worse, cancellation.

CCF SA supports project retention and actively seeks to reduce the risk of further reprofiling as we approach the Mid-Year Economic and Fiscal Outlook (MYEFO). The MYEFO may inform a mid-year budget review at both Federal and State levels, and South Australia must be considered for its unique challenges and the damage already caused due to existing delays.

The high-level breakdown of Budget 2023–24 figures is summarised approximately as follows (new budget in blue):

New and Existing Infrastructure and Transport Projects:

2022–23 Budget	$2.03 billion	
2022–23 Estimated Result	$1.63 billion	($391 million underspent)
2023–24 Budget	$1.97 Billion	($55 million less than 2022–23 budget)

Remove the North-South Corridor River Torrens to Darlington's figures from 2023-24 budget:

2022-23 Budget	$1.65 billion	
2022-23 Estimated Result	$1.24 billion	($394 million underspent)
2023-24 Budget	$1.27 billion	($369 million less than 2022-23 budget)

$15.4 billion is now captured as Total T2D Project Cost.

Road Safety Packages (including regional) a total of $470 Million, the breakdown for respective periods:

2022–23 Budget	$143 million	
2022–23 Estimated Result	$86 million	($57 million underspent)
2023–24 Budget	$33 million	($110 million less than 2022–23 budget)

New Projects

2022–23 Budget	$232 million	
2022–23 Total Project Cost	$1.29 billion	
Total Number of Projects	26	(21 being infrastructure projects)
2023–24 Budget	$22 million	($210 million less than 2022–23 budget)
2023–24 Total Project Cost	$128 million	($1.16 billion less than 2022–23)
Total Number of Projects	9	(17 less projects than 2022–23)

Projects include:

- planning studies
- 1 x business case
- safety cameras
- ticketing enhancements
- Adelaide Aquatic Centre
- 1 x roundabout (Mt Barker)
- bus service
- Regional Road Safety Infrastructure ($2.5 million)

STATE BUDGET RISK MANAGEMENT

An extract from the South Australian State Budget, Chapter 6: Risk statement, page 82 raises risks associated with 'the ability to deliver significant public sector infrastructure investments due to sector capacity constraints'. Impacts from the 90-Day Review have further reduce industry confidence, where South Australia has already observed several businesses hold back investment and growth plans in response to current delays and potential further hits to planned projects.

A sensible and industry-supported 'reprofiling' of projects beyond those immediately ready to commence could be considered. This will flatten the procurement trajectory whilst still providing adequate projects of various sizes to support ongoing industry growth and investment.

State Budget extract is as follows:
Risk factors that could impact the performance of the Australian and South Australian economy include:

- *the emergence of new, more virulent or vaccine-resistant variants of COVID-19 that may require further restrictions on public activity, negatively affecting confidence and private consumption and investment;*
- *any further imposition of tariffs on Australian exports (primarily from China) and Australia's ability to find alternate markets for export products affected by tariffs;*

- *continued low growth in household income and its impact on household consumption, especially given high levels of household debt, particularly in the event of rises in interest rates;*
- *the pace at which international tourism and education can return to pre-pandemic levels;*
- *the ability to deliver significant public sector infrastructure investments due to sector capacity constraints;*
- *changes in agricultural output due to significant climate variability.*

RECOMMENDATION 8 – Build and implement a GARP infrastructure maintenance work plan that is reliable and published via a live, dynamic portal which contractors and the community can trust.

As the state continues to grow, there will need to be a better, long-term, program for the asset management for the full life of assets and upgrades of existing infrastructure.

Investing sufficiently in this will reduce overall costs by reducing the need for unnecessary replacement of infrastructure before end of life. South Australia has an identified list of insufficient asset management in the built environment and facilities across all sectors including transport, justice, health, education, local government, and community facilities. The identified current budgeting for asset management is consistently well below Australian and global levels and standards.

For example, the current state road network is approximately 50 years out of date, built to serve a completely different State economy – one with less, lighter, and smaller vehicles and different freight and community flows, networks, and volumes to other Australian jurisdictions. There is currently an estimated road maintenance backlog of up to $3 billion dollars.

As a state, we are playing 'catch up' in regard to the continuing maintenance and upgrades of our road networks. Deferring road maintenance is a false economy, as they will need reconstruction/replacement before end of design life at a much higher cost to the community, resulting in a loss of available capital for new infrastructure development.

Examples of maintenance and upgrade projects considered to be of high priority include:

- sufficient and functional asset management program for all government and sector infrastructure and facilities (including the South Australian transport network, and utilities);
- rolling state-wide railway level crossing upgrade program; there are 350 crossings in SA, and many have a higher incidence of fatalities and casualties;
- duplication of the Augusta Highway;
- major freight and defence transport regional corridor upgrades for regional corridors in the State: a typical $1.0 billion road project would result in the creation of 200 jobs in the construction phase, State and regional economic stimulus, safer roads, increased tourism, and more productive and timely freight tasks across the state and into major interstate networks;
- Local Government infrastructure: providing all Councils (68 councils) with annual additional funding to spend on urgent local infrastructure projects, and upgrades, using local goods, services, and materials, employing local people and using local businesses – most councils

have shovel ready projects unable to commence because of insufficient capital and operational budgets;

- designating and upgrading urban priority freight road corridors particularly to and from Port Adelaide and the Adelaide Airport for efficient and rapid transport of goods, ensuring these road corridors are of a high standard, overhead infrastructure is not present, and regulatory requirements and permitting associated with oversize loads etc are minimised;
- completing key connecting urban and peri-urban transport and freight corridors (for example the north-south corridor, and connections from the South-Eastern Freeway into Adelaide);
- extensions and upgrades to the metropolitan Adelaide public transport tram system – trams are popular, relieve traffic congestion, and generate community population uplift and local economic development (for example extending the tram line to the Adelaide Oval and North Adelaide);
- undertaking a State-wide water and sewerage network replacement program – many parts of the systems are more than 100 years old, are asbestos cement and terracotta pipes that have a high failure rate and damage property with increasing frequency;
- undertaking a State-wide power line undergrounding program – overhead wires are a significant fire risk in storm events and the iron/cement posts are dangerous and a road safety risk;
- undertaking a State-wide bridge upgrade and replacement program – most SA bridge infrastructure is aged and in poor asset condition, with some over a hundred years old and some constructed from timber.

RECOMMENDATION 9 – Enhance the efficiency of project planning in Public Agencies, with the aim of bringing projects to the market quicker and with greater quality.

Several Public Agencies, including the Department for Infrastructure and Transport (DIT) have capacity constraints that hinder their ability to bring construction projects to the market in a timely manner. Investigation must be made to determine how infrastructure projects can be identified, designed, and put to market far more efficiently.

The civil industry suggests the following inefficiencies exist for small and major infrastructure projects for all sectors in South Australia:

- lack of integration across government programming for annual capital spend and scheduled projects release to market;
- lack of quality in project design, functional and detailed specifications, common standards, fit for purpose, construction methodologies and details, and evidence of increased contract variations and costs;
- lack of Government business cases being ready or being slow to final approval and delays to tender;
- poor segmentation of projects in class and capital size for local industries, SMEs and companies to compete, provide efficiencies and grow;
- issues concerning delays in tender releases across public agencies;
- lack of government capacity and capability across project, contract and construction management, and inability to deliver multiple concurrent major projects.

In the civil construction industry, the current absence of significant State infrastructure projects is hindering the industry's capacity, capability, and agility in delivering ongoing projects in South Australia in the near future. To successfully retain skilled work forces, consulting engineers, trades, and semi-skilled workers required for infrastructure projects, there needs to be consistency of projects coming to market for construction, at a sustainable or increasing total capital value, rather than a 'stop/start' approach from year to year.

It is even more important for funded projects to proceed without delays to support local industry, rather than have announcements year on year incurring long periods of time from concept to release of tenders for construction.

There is an enduring concern that there are few or no 'shovel ready' projects available when Federal funds, out of cycle, unexpectedly become available for economic stimulus or release. South Australia has a history of not being proactive in the planning and development of key infrastructure projects and a history of missed opportunities for significant developments and community facilities.

It is necessary to build capacity and capability within government to enable agile and responsive planning, program and project management, procurement, and delivery of the infrastructure projects currently on the horizon and further into the future.

In addition, government expenditure and funding/financing models need to be leveraged to stimulate the economy, jobs, and the State as a whole.

RECOMMENDATION 10 – Ensure the new Infrastructure Planning and Development Unit (IPDU) has the resources, budget, and power to deliver its objectives. Related forward works plans driven by the IPDU must be transparent and communicated readily (refer recommendations 7 & 8).

Historically, the development of infrastructure has been primarily driven by private sector industry proponents, resulting in inefficiencies in infrastructure. CCF SA maintains that infrastructure provision be planned, developed, and implemented in a coordinated manner by all levels of government, state, regional, and local, with the input of the civil, building and development industry, even in master planned zones.

The government has established an Infrastructure Planning and Development Unit (IPDU) to help drive residential developments and coordinate infrastructure investment. The Unit is to be staffed by five full-time equivalent employees and will be charged with coordinating the provision of utilities such as electricity, water and sewerage, and public infrastructure such as roads and schools.

CCF SA recommends this new IPDU be afforded greater resources, budget, and power to ensure supporting infrastructure is planned and delivered as efficiently as possible.

The State Government is fast tracking what will be the single largest release of residential land in the state's history – set to deliver over 25,000 more homes for South Australians. This unprecedented land release is expected to open the door for more than 50,000 South Australians both north and south of the city. The rezoning has already commenced, along with plans to improve infrastructure in these new development areas, including better roads and new schools.

During the 2022 election campaign, the government committed to invest in public housing and build 400 extra new homes, undertake major upgrades on 350 empty properties so they can be homes again for people in need, and update a further 3,000 homes in a maintenance blitz. The government is committed to an additional 1,144 households live in public housing by 30 June 2026. This includes $232.7 million of additional investment in public housing, which will deliver 564 new homes.

The SA Government is working closely with the Commonwealth Government to progress the following projects, which will include a mix of affordable and market housing:

- Playford Alive (Newton Boulevard) – 249 new homes, including 25 affordable rental properties
- Bowden (Second Street) – 36 new affordable rental properties
- Bowden (Third Street) – 60 new affordable rental properties
- Prospect (Churchill/Regency Roads) – 72 new affordable rental properties

The projects are early priorities identified under the Housing Accord, with more set to be identified in due course in conjunction with the Commonwealth Government and community housing providers.

The State Government has started the rezoning of 235 hectares of land at Hackham – creating the capacity for at least 2,000 new homes. In addition, the following sites have been identified for rezoning for residential use:

- 10,000 homes at Dry Creek
- 10,000 homes at Concordia
- 1,700 homes at Sellicks Beach

This land release would be more than double the number of allotments released in Mount Barker in 2011 and four times the number of allotments released at Mawson Lakes in the early 2000s. Master planning for the first of these sites will begin this year.

It is anticipated construction on the first homes could begin next year with at least 15% earmarked for affordable housing. The additional supply is expected to open the door for more than 50,000 people.

“We know that regional South Australia is facing its own unique housing challenges, which is why we’re establishing a dedicated Office for Regional Housing to work together with local government and other partners to deliver more housing. The first initiative to be piloted by the new office will be a program to deliver new housing for key workers in the regions. Our plan is expected to stimulate around $965 million of additional housing construction activity, which will support South Australian jobs right across the state.” [3]

“The State Government is fast tracking the largest release of land for new homes in the State's history, with plans in place to improve infrastructure around these new developments.

Over 25,000 homes will be built on land at Hackham, Sellicks Beach, Dry Creek and Concordia, Noarlunga Downs, Aldinga and Golden Grove.” [4]

[3] https://www.treasury.sa.gov.au/Growing-South-Australia/a-better-housing-future/A-Better-Housing-Future-February-2023.pdf
[4] https://www.treasury.sa.gov.au/Growing-South-Australia/a-better-housing-future

The expansion of Roseworthy serves as an example, with six years passing from approval to shovel-ready allotments. With a current shortage of land supply and expansions taking approximately ten years, re-zoning within townships should be given high priority and be outlined in the GARP.

Additionally, securing tenure for land and proper planning and zoning considerations are also key components in supporting efficient infrastructure development. This includes ensuring the civil industry remains capable, with capacity and is highly competitive.

The government plays a crucial role in facilitating and making policy decisions to identify sources of utilities and transport options, key infrastructure routes and corridors in regional areas, and streamline land tenure and access for supporting infrastructure development. Ultimately, promoting economic outcomes and regional development through efficient establishment and whole-of-life infrastructure asset development is essential for achieving growth targets.

APPENDIX – SUPPORTING INFORMATION

INFRASTRUCTURE PROJECTS AND PROGRAMS

All projects supported by the new Federal Government Infrastructure Policy, including road maintenance programs, should commence as soon as possible, these projects include:

South Australia

The following projects will be built with additional Australian Government funding:

Project name	Additional Australian Government funding ($)	Total Australian Government funding ($)
North-South Corridor - Torrens to Darlington	2,725,000,000	7,700,000,000

The following projects will be built as planned:

Project name	Total Australian Government funding ($)
Adelaide Hills Productivity & Road Safety Package	120,000,000
Anangu Pitjantjatjara Yankunytjatjara (APY) Lands - Main Access Road Upgrade - Stuart Highway to Pukatja	125,424,000
Automated Train Protection Signals Upgrade – Seaford Line	5,000,000
Brighton Road Intersection Improvements	15,000,000
Cockburn to Burra Corridor (SA) - Barrier Highway Upgrade	50,000,000
Cross Road - Fullarton Road Intersection	30,500,000
Eyre Peninsula Network	41,000,000
Fleurieu Connection	221,600,000
Goodwood and Torrens Junctions	210,707,600
Kangaroo Island Road Safety and Bushfire Resilience Package	32,000,000
Lefevre Peninsula Upgrades	50,000,000
Marion Road - Anzac Highway to Cross Road	200,000,000
Marion Road and Sir Donald Bradman Drive Intersection Upgrade	42,500,000
Nationwide Freight Highway Upgrade Program (SA)	400,000,000
Port Augusta to Perth Corridor (SA) - Eyre Highway Upgrade	75,200,000
Regional Level Crossing Upgrade Fund – SA	15,000,000
Renmark to Gawler Corridor (SA) - Sturt Highway Upgrade	70,000,000
Road Safety Program additional funding - SA	84,000,000
Rural Roads Package - Horrocks Highway Corridor	84,000,000
Rural Roads Package - Naracoorte Roundabouts	11,800,000
Rural Roads Package - Safety Package	124,400,000
South Eastern Freeway Upgrade	120,000,000
Southern Expressway and Majors Road Interchange	60,000,000
Strzelecki Track Upgrade - Sealing	164,000,000
Targeted Investments to Improve National Supply Chain Resilience	60,000,000
2019-20 to 2023-24 National Network Maintenance (SA)	251,295,719
Remote Roads Upgrade Pilot Program	7,412,160

The following planning projects will continue as planned:

Project name	Total Australian Government funding ($)
High Productivity Vehicle Network (SA) - Planning	8,500,000
Level Crossing Removal Planning Program	5,000,000

The Review process found that there are projects that do not demonstrate merit, lack any national strategic rationale and do not meet the Australian Government's national investment priorities. In many cases these projects are also at high risk of further cost pressures and/or delays.

The following projects will not receive Australian Government funding at this time:

Project name
Hahndorf Township Improvements and Access Upgrade
Main South Road Productivity Package
Old Belair Road upgrade, Mitcham
Onkaparinga Valley Road - Tiers Road - Nairne Road Intersection Upgrade
Truro Bypass

The following road corridors will be established:

Corridor name	Total Australian Government funding ($)	Comprised of the following existing projects
Princes Highway	361,000,000	Princes Highway - Port Wakefield to Port Augusta Duplication works
		Augusta Highway Duplication Stage 2
		Princes Highway Corridor - Intersection Improvements
		Princes Highway Corridor - Overtaking Lanes
		Princes Highway Corridor - Pavement Works
		Princes Highway Corridor - Rest Areas
		Princes Highway Corridor - Safety and Signage Improvements
		Princes Highway Corridor - Shoulder Sealing

Other Project Considerations

Thevenard Export Port Upgrade

Currently, there is a feasibility study in progress to determine the economic feasibility of deepening the Thevenard shipping channel on the West Coast of South Australia.

The study, which is fully funded by Flinders Ports and Gypsum Resources Australia, will explore various aspects of the project, such as deepening the channel from its current depth of 8.2 metres to 9.9 metres and considering loading vessels to greater depths than 9.5 metres, which would require deepening of the berth pocket.

Additionally, the study will look into any potential barriers to the project and provide accurate project costings. To accomplish this, the study will involve geotechnical investigations and consultations with dredging contractors to gain insight into the costs associated with the project.

Should the feasibility support the planned works, further consideration should include:

- Immediate requirement to upgrade the port land side infrastructure capacity and flexibility and marine channel access.
- New wharf ship loader infrastructure to improve over wharf freight capacity and port multi-use efficiencies.

Adelaide Freight Corridor Access (New Corridor Development)
Urgent progress of the development of infrastructure solutions and projects to improve freight efficiencies and South Australia's competitiveness in national and global markets.

Aldinga Public Transport Rail Extension
The securing of the proposed corridor alignment and development of the extension of the Adelaide to Seaford Rail corridor to Aldinga, including associated public transport interchange and station infrastructure for community and economic benefits.

Metropolitan Adelaide Public Transport Upgrades
There is a growing need to develop and upgrade or bring new public transport services in the Adelaide urban and peri urban area.

Water and Wastewater Sector
The state's water and wastewater assets are aged with pressures for upgrading and replacement, and priorities to meet urban and regional growth demand. The projects requiring consideration include:

Adelaide and Near Region Stormwater Upgrades
The priority initiative for the immediate implementation of improved flood mitigation infrastructure for urban Adelaide and the near northern region for community safety and economic benefits.

Urban Adelaide Stormwater Program
The program for the development and implementation of Infrastructure and civil works for an integrated Adelaide urban stormwater flood mitigation, and water harvesting program including:

- Keswick Creek/Brownhill Creek Catchments flood mitigation upgrades;
- Adelaide urban upgrades and water reuse;
- South West Drainage Scheme flood mitigation upgrades;
- Hackney to River Torrens mouth upgrades.

Northern Adelaide Irrigation Scheme Expansion
This program for the completion of business cases for the development of the water supply infrastructure and civil works for the expansion of the Northern Adelaide Irrigation Scheme will provide an increased and sustainable water supply into the Barossa Valley and Clare Valley wine growing regions.

Far North Regional Water Supply
The project for the completion of business cases and commercial funding/finance models will develop infrastructure to supply potable and industrial water supplies to future proof and stimulate expanded and new mining and associated industries in the state's far north.

Wastewater Treatment Expansion to Metropolitan Areas
The project for the immediate development of full sewerage collection infrastructure and wastewater treatment for the township of Mount Barker and to Tea Tree Gully will include:

- development of a new sewerage collection network;
- development of new wastewater treatment plant and water reuse schemes.

Tourism/Community Essential Services Sector
The state's community liveability is dependent on sufficient and functional essential services and facilities. The projects requiring consideration include:

South Australian Jetties Upgrades
Development of priority rolling program and funding for the upgrade of the state's jetties:

- to sustain professional fishing in regional and urban South Australia;
- to provide improved recreational fishing facilities.

Natural Gas Network Expansion to Mount Barker
A project for the accelerated expansion of the Adelaide metropolitan natural gas network to supply the rapid growth area of Mount Barker will see the replacement of bottled LPG gas supply to the area and limited network.

Regional Infrastructure Development
Strategic considerations of infrastructure priorities tend to be urban-centric. South Australia's regional areas have approximately 27 % of the state's population and contribute over 70% of the state's income in exports and economic activity.

South Australia is somewhat unique in its 'patchwork' of regional economies that are quite different from each other in terms of geography, demographics, and economies. The state also has a multi-sector distribution of this regional distribution across major regional areas:

- Eyre and Western;
- Far North;
- North East;
- South East.

The key industries and economies in each region are variable and dominated by:

- mining and oil/gas;
- agribusiness (grain, livestock, and the horticulture and viticulture industries);

- tourism.

The key industries and activities in each region that are emerging:

- hydrogen production and export;
- Space and Defence;
- electricity renewables generation and storage technologies (wind, solar, batteries);
- national radioactive waste management.

A major issue is the infrastructure, utilities and key supply chain transport links are both aged, and of limited capacity to meet forecast growth in the resources, agribusiness, tourism, and new industries to sustain and generate increasing economic growth. Additionally, services capacity and capability are often limited with poor access. For example, mobile telephone and internet services are either poor or unavailable in some regional areas, and this needs to be addressed for industry, as well as community liveability.

In summary, the key infrastructure challenges across the regions include:

- low capacity and access;
- aged and poor existing assets condition;
- low scalability for future demand;
- poor aggregation and inefficient development and application of capital for infrastructure (particularly multiple parallel transport and utilities development by private proponents);
- land use and access constraints.

This reality is generally not captured or integrated in government strategy and policy.

Strategic improvements in regional areas are a priority for roads and rail networks systems that link to ports and connect to other national transport networks for efficient freight tasks and the community. Key export ports either need to be established or upgraded to provide capacity and scalability for the state's growth and global market competitiveness.

FEDERAL BUDGET IMPACT

South Australia rarely receives the infrastructure commitment as other states such as NSW, VIC, and QLD. Only $1.1 billion. In the 2022–23 Federal Budget, the Australian Government is delivering on $660 million of election commitments for vital infrastructure projects in South Australia.

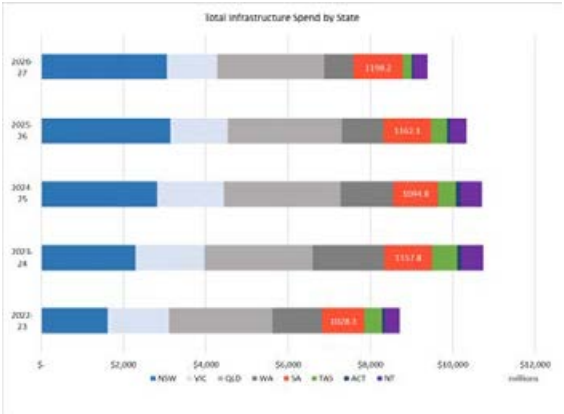
This includes $60 million to construct on and off ramps for the Southern Expressway at Majors Road which will reduce traffic on Brighton Road. It also includes $200 million to reduce congestion in Adelaide's south and improve road safety by removing the Marion Road Level Crossing and upgrading Marion Road between Cross Road and Anzac Highway.

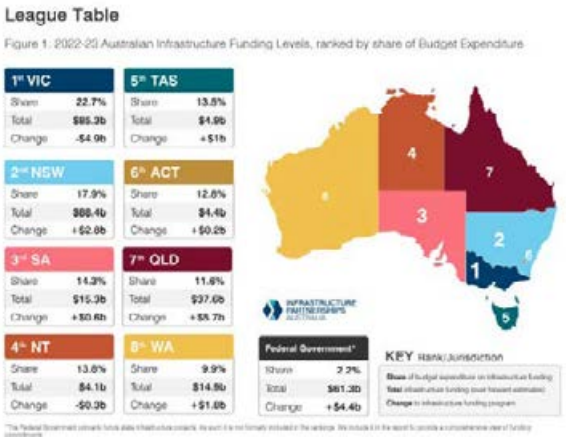
These major investments will remove a major blockage for locals' daily commute, improve safety for motorists and pedestrians, and create business opportunities across the region with improved transport flows and better amenity. The Budget investment will also include a share of a new $1.5 billion Freight Highway Upgrade Program. This investment will deliver priority upgrades to the interstate Tanami Road and other nationally significant freight routes, including the Dukes, Stuart and Augusta highways in SA.

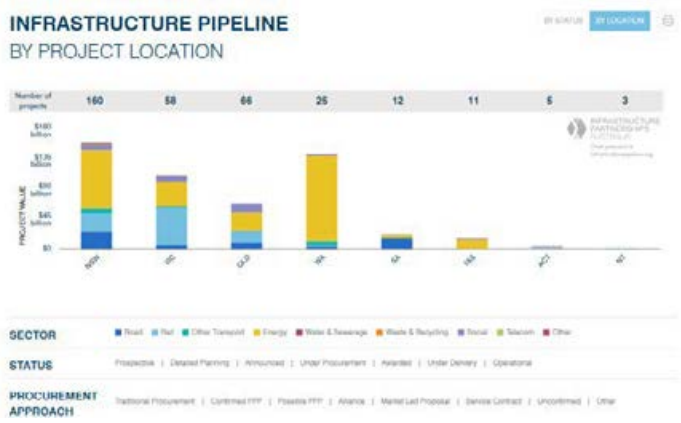
We are working closely with the South Australian Government on the investments that deliver the best value for taxpayers' dollars and the best outcomes, including creating jobs and boosting skills, for the people of South Australia.

Victoria and NSW continue to dominate the pipeline of committed funding, accounting for 68 per cent of total general government sector infrastructure spending over four years.

For the second consecutive year, Victoria remains on top of the rankings. The Victorian Government will spend 23 per cent of its total general government expenditure on infrastructure over four years, a slight reduction on the 24 per cent share in last year's Budget.



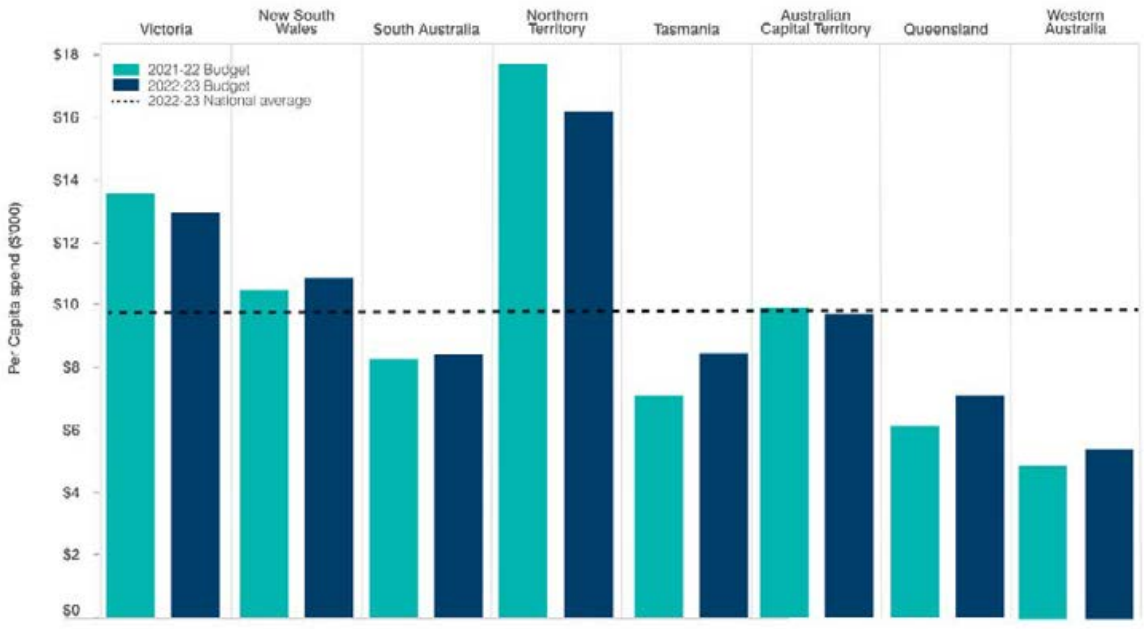




Per Capita Infra Spend Analysis

This year's Budget season sees mixed results for per capita infrastructure spend, with most states delivering minor increases. A $1,400 per person increase in Tasmania and a $1,500 per person decrease in the Northern Territory provide exceptions to this rule. Despite this decrease, the smaller population and large geography of the Northern Territory sees it deliver the highest per capita infrastructure spend again. The moderation of infrastructure spending sees a $600 decline per person in Victoria; however this remains significantly higher than the historical average after the $3,000 increase delivered in the 2021–22 Budget. Figure 3 shows per capita infrastructure investment across Australia over the last two years.

Figure 3: Per capita infrastructure funding by state and territory



Source: Infrastructure Partnerships Australia analysis based on 2022-23 Federal Budget

STATE ECONOMICS

The South Australian Productivity Commission (SAPC) Inquiry – Turning Research into Economic Competitiveness for South Australia, 16 March 2023 states:

- South Australia's economy has been underperforming over the past three decades, with slower growth and lower wages than our peers in the eastern states.
- South Australia's economy is currently performing strongly coming out of COVID-19, but the current strength appears to be cyclical not the start of an upwards structural trend. The longer-term picture is of a state:
    - stuck in a low growth trajectory;
    - falling behind the eastern states in incomes.

  Annual average growth in GSP over the past three decades has been 2.1 per cent. And our long-term structural growth trend is not positive with the 2010s being the worst decade with growth averaging only 1.0 per cent.
- This prolonged period of weak economic growth impacts on people's daily lives. Wages have declined relative to the rest of the country, with both private and public sector wages 8 per cent below the national average.
- As well as being low growth, the South Australian economy shows little evidence of being internationally competitive outside of commodities. Exports are almost all in commodities and basic metals.
- Increasing productivity increases the competitiveness of local businesses, allowing them to grow and their employees to earn higher wages. Unfortunately, South Australia has had weak productivity growth, particularly over the last decade. This has been the main factor behind our weak overall economic growth, and for wages falling behind the rest of the country.
- South Australia's business sector is smaller, less dynamic, and is less likely to be higher-growth than businesses in the eastern states.
- South Australian businesses are generally very small, and the business sector is much less dynamic that those in the eastern states, with fewer entries and exits.
- South Australia is at the edge of some potentially very significant economic opportunities, particularly from the AUKUS submarine build and from the state's potential to contribute to the global green energy transition.
- However, the weakness in our state's innovation performance has not just held back incomes and jobs growth over the past decades. It also represents a barrier to South Australian's fully realising the benefits of the emerging opportunities.
- Annual average growth in GSP over the past three decades has been 2.1 per cent. And our long-term structural growth trend is not positive with the 2010s being the worst decade with growth averaging only 1.0 per cent.
- This prolonged period of weak economic growth impacts on people's daily lives. Wages have declined relative to the rest of the country, with both private and public sector wages 8 per cent below the national average.

South Australia's economy will continue to expand in the new year, but at a slower pace. After two years of rapid growth, the state economy is now operating at a very high level of capacity utilisation with unemployment at low levels.

"South Australia's economic growth was very strong through 2021 and the first half of 2022, but there are signs that it is now slowing." – *Mr Jim Hancock, Executive Director, South Australian Centre for Economic Studies, the University of Adelaide*

STATE OF THE SA CONSTRUCTION INDUSTRY

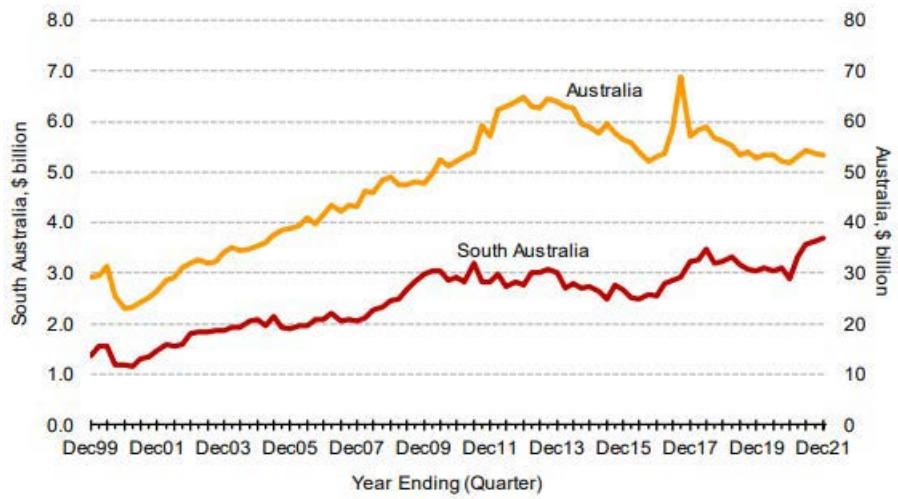
The SA Centre for Economic Studies, University of Adelaide, Economic Issues, March 2022, states: The construction industry is a major element of the South Australian economy.

The Australian Bureau of Statistics (ABS) estimates that the construction sector accounted for 6.8 per cent ($8.0 billion) of Gross State Product in 2020/21 – a contribution exceeded only by the healthcare and social assistance sector (10 per cent)[5].

With such a large footprint, the construction industry is naturally a major source of employment. In 2021, it employed approximately 74,800 people, which is equivalent to 8.6 per cent of the total workforce in South Australia, making it the fourth largest employing sector[6].

Over the last five years, the construction sector has endured some considerable shifts in conditions and sentiment. A number of construction companies within South Australia had collapsed, most noticeably civil engineering firm York Civil, which entered voluntary administration in August 2018[7].
Figure 2.1: Construction Work Done Total construction work done in South Australia was valued at $14.5 billion in 2021, equivalent to 6.5 per cent of all construction work done in Australia ($221.6 billion).

Figure 2.1: Construction Work Done
South Australia and Australia – Chain Volume Measures, Seasonally Adjusted Series



Source: Australian Bureau of Statistics, Building and Construction: www.abs.gov.au

Sectoral Trends Overall activity levels in the South Australian construction sector are particularly sensitive to shifts in engineering construction, which can fluctuate significantly over the medium term, especially with the approval of large one-off projects – see Figure 2.2.

Engineering activity shifted to a higher level around the time of the Global Financial Crisis (GFC) as a series of major public sector projects were implemented to address infrastructure constraints and support economic activity (which in large part explains why construction activity has kept pace with national activity).

[5] Source: ABS, Australian National Accounts: State Accounts, 2020-21, Cat. No. 5220.0
[6] Year average employment for the four quarters to the November Quarter 2021. Source: ABS, Labour Force, Australia, Detailed. Table 05. Employed persons by State, Territory and Industry division of main job (ANZSIC), Cat. No. 6291.0.55.001.
7 The Advertiser, 'South Australian construction and civil engineering form York Civil enters voluntary administration', August 6, 2018. Available: https://www.adelaidenow.com.au/news/south-australia/south-australian-construction-andcivil-engineering-firm-york-civil-enters-voluntary-administration/news-story/0f9fd556a8510371fec8ca845ef794de

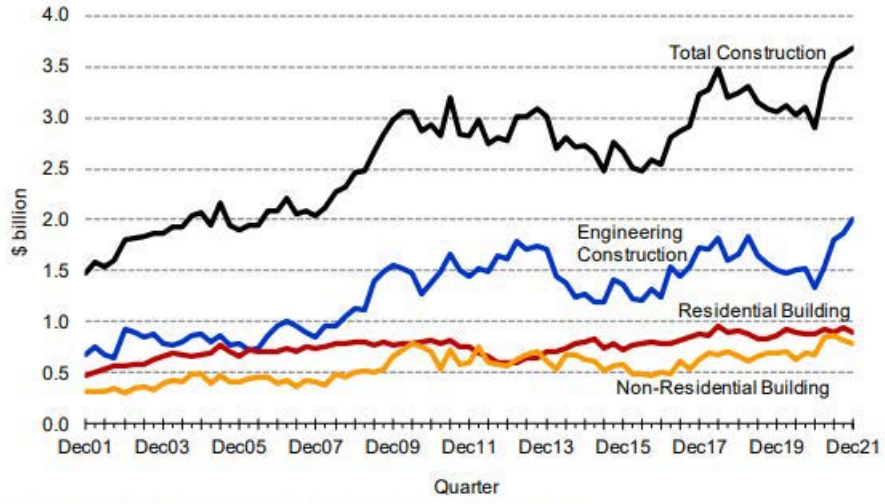
These projects include the Adelaide Desalination Plant, Adelaide oval redevelopment and various transport infrastructure projects, especially those comprising Adelaide's North South Corridor, which commenced with the Gallipoli Underpass in 2007 and the more substantive Northern Expressway in late 2008.

The private sector also contributed to the strong growth in engineering construction in the years following the GFC through large increases in work done for 'heavy industry', principally 'mining', and 'electricity generation, transmission etc. and pipelines'.

A large rebound in engineering construction emerged in early 2017 as the next major phase of public sector transport projects moved into construction (eg Torrens Road to River Torrens, Northern Connector and Darlington Upgrade) and private sector investment in 'electricity generation, transmission etc. and pipelines' surged in response to high energy prices. Overall activity levels within the sector then experienced a gentle decline from mid-2018 to the end of 2020, mainly in response to the boom in renewable energy projects passing through and the initial rollout of the National Broadband Network (NBN) moving toward completion.

Over the last year, engineering construction has picked up strongly once again in response to a sharp rise in work done for 'heavy industry' (driven, in part, by commencement of a major smelter maintenance program at BHP's Olympic Dam mine) and a rebound in investment in energy infrastructure.

Figure 2.2: Construction Work Done by Sector
South Australia – Chain Volume Measures, Seasonally Adjusted Series



Source: Australian Bureau of Statistics, Building and Construction: www.abs.gov.au

Refer Figure 2.2: Gross Value Added Estimates of construction work done can give a misleading picture of the contribution of construction activity to the local economy to the extent that 'work done' includes imports, and there are large variations in import intensity over time or between projects.

Such variations are unlikely to be of much economic significance for residential and non-residential building, but are of more import for certain forms of engineering. Such examples would include the importation of wind turbines and lithium-ion batteries as part of renewable energy projects, and from a broader national perspective, the importation of floating liquefied natural gas (LNG) facilities as part of offshore natural gas projects.

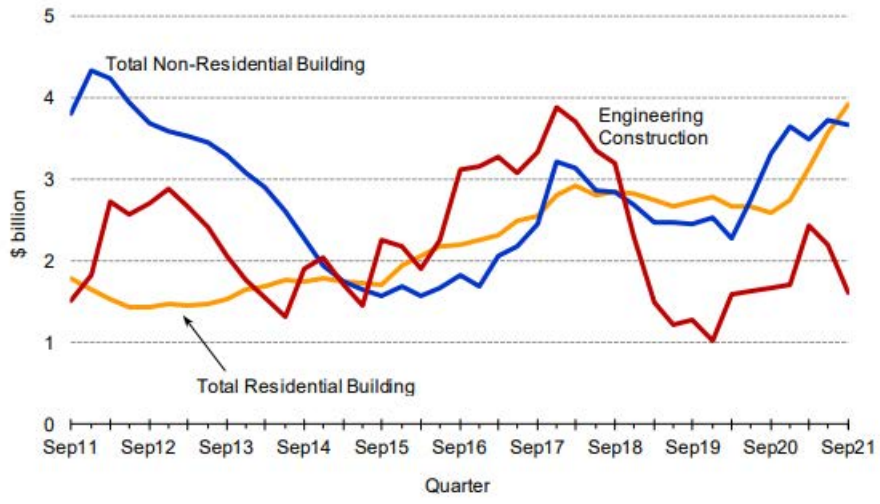
Gross value added, which is a measure of the value of industry output less the value of intermediate consumption, removes the distortion caused by imports, and represents industry contributions to gross state/domestic product. The total value added of the South Australian construction industry was $8.0 billion in 2020–21, which is equivalent to 6.8 per cent of Gross State Product. In comparison, the Australian construction industry's share of Gross Domestic Product was 7.0 per cent Engineering construction work 'yet to be done' eased through 2021 – see Figure 2.7.

Forward work schedules for engineering construction activity have contracted through the middle of 2021, which is a concern given the importance of engineering to supporting overall construction activity levels over recent years.

Following the recent decline, the total value of work 'yet to be done' in the September quarter of 2021 was down 3.6 per cent ($61 million) compared to a year earlier.

This decline was driven by falls in outstanding work on 'bridges, railways and harbours' (down $146 million or 31 per cent), 'heavy industry' (down $50 million or 23 per cent), and 'water storage and supply, sewerage and drainage' (down $23 million or 11 per cent). On the other hand, the value of work 'yet to be done' has risen strongly in respect of 'roads, highways and subdivisions' (up $145 million or 27 per cent).

Figure 2.7: Building Work in the Pipeline and Engineering Construction Work Yet to be Done
South Australia



Source: Australian Bureau of Statistics, Building and Construction: www.abs.gov.au

Looking ahead, commencement of the Torrens to Darlington (T2D) section of the North South Corridor will provide a sustained boost to engineering construction, with construction of the Stage One Southern Tunnel expected to commence in late 2023 (enabling works are currently in progress). There are also a range of potential private sector initiatives on the horizon, including Stage 1 of a multi-commodity deep water port at Cape Hardy, which would in turn help facilitate development of Iron Road's Central Eyre Iron Project (ie iron ore mine); a proposed green steel plant as part of Liberty Primary Steel's Whyalla Steelworks operations; and various renewable hydrogen projects as part of the state government's proposed Port Bonython Hydrogen Hub.

While approval of one of more of these projects would provide a boost to engineering construction, **there is considerable uncertainty over** if and when these projects may go ahead, with some projects being sensitive to developments in resource prices and financing.

On the other hand, there have been declines in business numbers across a number of construction subsectors, including 'other building installation services' (down 4.8 per cent), 'fire and security alarm installation services' (down 4.0 per cent), 'other heavy and civil engineering construction' (down 3.3 per cent), and 'bricklaying services' (down 3.2 per cent).

Table 4.2: Counts of Actively Trading Construction Businesses by Sector
South Australia

ANZSIC Industry	No of businesses operating at 30 June 2021	Change over year to...	
		30 June 2020	30 June 2021
House Construction	2,997	74	92
Other Residential Building Construction	1,158	48	62
Non-Residential Building Construction	904	16	33
Road and Bridge Construction	99	-5	8
Other Heavy and Civil Engineering Construction	415	-10	-4
Land Development and Subdivision	849	-19	27
Site Preparation Services	1,028	-27	21
Concreting Services	796	1	1
Bricklaying Services	566	-4	-15
Roofing Services	361	3	-5
Structural Steel Erection Services	255	1	5
Plumbing Services	1,633	-35	37
Electrical Services	3,011	-27	81
Air Conditioning and Heating Services	469	-9	28
Fire and Security Alarm Installation Services	216	-8	-1
Other Building Installation Services	320	-8	-8
Plastering and Ceiling Services	1,087	43	31
Carpentry Services	2,618	-21	101
Tiling and Carpeting Services	1,329	20	36
Painting and Decorating Services	1,216	0	30
Glazing Services	196	9	5
Landscape Construction Services	1,222	6	48
Hire of Construction Machinery with Operator	100	0	6
Other Construction Services n.e.c.	1,364	56	48
Total	24,209	104	667

Notes: (a) Totals may differ from other tables and sources as some cells have been randomly adjusted or suppressed by the ABS to avoid the release of confidential data.
Source: ABS, Counts of Australian Businesses, including Entries and Exits, July 2017 to June 2021, Cat. No. 8165.0

Table 4.2 shows counts of actively trading businesses by industry class and changes in the number of these businesses over the two most recent years. Most sectors of the construction industry recorded increases in business numbers over the two years to 30 June 2021.

The largest increases in proportional terms over this period were for 'other residential building construction' (up 10 per cent), 'other construction services not elsewhere classified' (up 8.3 per cent), 'glazing services' (up 7.7 per cent), 'plastering and ceiling services' (up 7.3 per cent), **and 'hire of construction machinery with operator' (up 6.4 per cent).**

On the other hand, there have been declines in business numbers across a number of construction subsectors, including 'other building installation services' (down 4.8 per cent), 'fire and security alarm installation services' (down 4.0 per cent), **'other heavy and civil engineering construction' (down 3.3 per cent)**, and 'bricklaying services' (down 3.2 per cent). One of the most notable features from Table 4.2 is that residential building contains a much larger number of businesses compared to non-residential building and especially engineering construction.

There were 2,997 actively trading businesses in house construction and 1,158 in other residential building at 30 June 2021, compared to 904 businesses in non-residential building, **99 in road and bridge construction, and 415 in other heavy and civil engineering construction.** The greater propensity of businesses in residential construction reflects that average project sizes tend to be smaller for residential building, especially compared to engineering projects.

One consequence of this abundance of firms and small project sizes is that competitive pressures within the residential sector may be greater those in other sectors with fewer businesses. Looking ahead, forward indicators suggest that overall activity levels in the construction sector should remain at a robust level in the near term. There was a considerable volume of outstanding work for both residential and non-residential building in late 2021, while building approvals in January 2022 were at relatively high levels.

On the other hand, the outlook for engineering construction is less encouraging. Forward work schedules for engineering eased through 2021 and the largest project on the horizon – the Torrens to Darlington (T2D) section of the North South Corridor – is not expected to begin major construction until late in 2023. While there are a number of private sector initiatives on the horizon that could provide a significant boost to engineering construction (eg deep-water port at Cape Hardy, green steel plant at Whyalla Steelworks, renewable hydrogen projects), there remains considerable uncertainty over whether these projects will ultimately proceed.

STATE BUDGET PROJECTS 2023-24

State Budget 2023-24 Summary and Comparison Table

Investing expenditure summary
The 2023-24 investment program is $2152.1 million.

	Estimated completion	Total Project Cost	Budget	PREVIOUS BUDGET Estimated Result	PREVIOUS BUDGET Budget	PREVIOUS BUDGET Estimated compeltion	Variance Budget v Actual	Variance of Revised Completion Qtr
	2023-24	2023-24	2023-24	2022-23	2022-23	2022-23		
	Quarter		$0	$0	$0			
New projects								
Adelaide Metro tap and pay	Jun-25	$ 7,000	**$ 5,000**	$ 1,000	New Project			
Lightsview to CBD	Jun-23	$ 2,850		$ 2,850	New Project			
Mount Barker Roundabout Upgrade	Jun-26	$ 40,000	**$ 3,000**		New Project			
New Safety Cameras	Jun-24	$ 8,536	**$ 3,000**	$ 5,536	New Project			
Planning Studies	Jun-25	$ 5,000	**$ 2,500**		New Project			
Regional Road Safety Infrastructure	n.a.		**$ 2,500**		New Project			
River Murray Road Repair Package	Jun-23	$ 40,000	**$ -**	$ 40,000	New Project			
SA Aquatic and Leisure	Jun-26	$ 23,500	**$ 5,200**		New Project			
SAPOL Barracks Relocation – Business Case	Jun-24	$ 2,000	**$ 1,000**	$ 1,000	New Project			
Total new projects		**$ 128,886**	**$ 22,200**	**$ 50,386**	**New Project**			
Existing projects							-	
Adelaide Aquatic Centre	Dec-25	$ 135,000	**$ 29,600**	$ 7,200	$ 5,000	Jun-25	- 2,200	6 months early
Adelaide Festival Centre Precinct — plaza and integration	Jun-26	$ 150,798	**$ 11,254**	$ 35,147	$ 6,000	Jun-24	- 29,147	2 years
Adelaide Hills Park 'n' Ride — Crafers	Jun-24	$ 6,000	**$ 5,000**	$ 1,000	$ 1,000		-	
Adelaide Hills Productivity and Road Safety Package	Jun-27	$ 150,000	**$ 22,000**	$ 18,000	$ 15,000		- 3,000	
Adelaide Railway Station	Jun-24	$ 4,500	**$ 4,055**	$ 150	3 795	Jan-23	- 150	1 year
Adelaide Superdrome Upgrade	Jun-23	$ 1,836			$ 10,486		10,486	
Athletics Stadium Renewal and Upgrade	Jun-23	$ 6,000		$ 4,453	$ 4,319	Dec-22	- 134	6 months
Augusta Highway Duplication — Stage 1	Jun-27	$ 80,000	**$ 13,500**	$ 37,000	$ 41,500	Jun-24	4,500	3 years
Augusta Highway Duplication — Stage 2 (Nantawarra to Lochiel)	Jun-27	$ 180,000	**$ 47,000**	$ 79,000	$ 79,500	Jun-25	500	2 years
Augusta Highway Duplication — Stage 3 (Port Pirie to Crystal Brook) — Business Case	Jun-24	$ 5,000	**$ 761**	$ 2,400	$ 2,800	Jun-23	400	1 year
Automated Protection System — Seaford Line	Jun-25	$ 10,000	**$ 8,000**	$ 500	$ 6,000	Jun-24	5,500	1 year
Brighton Road Intersection Improvements	Jun-24	$ 30,000	**$ 2,000**	$ 2,641	$ 6,000		3,359	
Bus Fleet Replacement Program	n.a.		**$ 21,996**	$ 29,124	$ 25,325		- 3,799	
Clarence Park Train Station	Jun-24	$ 2,600	**$ 2,400**	$ 200	$ 1,600	Jun-23	1,400	1 year
Community Infrastructure Grants Program	Jun-24	$ 10,275	**$ 8,840**	$ 1,435	$ 3,805	Jun-23	2,370	1 year
Critical Road Bridge Maintenance	Jun-23	$ 20,000		$ 15,373	$ 14,131		- 1,242	
Direct Express Service — Adelaide Hills	Jun-24	$ 10,000	**$ 5,000**	$ 5,000	$ 5,000		-	
DIT Pirie Street lease fit-out	Jun-23	$ 6,064		$ 2,709	$ 5,544		2,835	
Duplication of Joy Baluch AM Bridge	Jun-25	$ 189,000	**$ 2,900**	$ 22,500	$ 38,000		15,500	
Ethelton Railway Station	Jun-24	$ 5,000	**$ 4,539**	$ 400	$ 4,700	Jun-23	4,300	1 year
Extended Bus Depot — Mt Barker	Jun-23	$ 2,000		$ 2,000	$ 2,000		-	
Flagstaff Road Widening	Jun-24	$ 32,880	**$ 500**	$ 2,500	$ 300		- 2,200	
Fleurieu Connections	Dec-25	$ 685,373	**$ 211,000**	$ 204,000	$ 228,000	Jun-25	24,000	6 months
Freight Highway Upgrade Program	Jun-33	$ 500,000	**$ 31,250**	$ 31,250			- 31,250	
Fullarton and Cross Roads Intersection Upgrade	Jun-24	$ 61,000	**$ 2,300**	$ 23,000	$ 17,000	Jun-24	- 6,000	
Gawler Line Electrification[(b)]	Jun-25	$ 667,430	**$ 20,000**	$ 30,000	$ 64,430	Jun-24	34,430	1 year
Gawler Line Electrification — Railcars	Dec-23	$ 175,000	**$ 6,500**	$ 57,290	$ 48,624	Jun-23	- 8,666	
Gawler Railway Line Stations Refresh	Jun-24	$ 20,000	**$ 2,459**	$ 1,100	$ 5,000	Jun-23	3,900	1 year
Glen Osmond and Fullarton Road Intersection Upgrade	Jun-25	$ 35,000	**$ 1,782**	$ 12,500	$ 14,000	Jun-24	1,500	1 year
Goodwood and Torrens Rail Junction Upgrade[(b)]	Jun-25	$ 364,446	**$ 1,000**	$ 1,177	$ 3,177	Jun-23	2,000	2 years
Goodwood, Springbank and Daws Road Intersection Upgrade	Jun-24	$ 53,400	**$ 300**	$ 1,200	$ 3,000	Jun-25	1,800	
Green Public Transport — Retrofit Hybrid Energy Systems to Diesel Trains	Jun-23	$ 10,000		$ 8,963	$ 8,000		- 963	
Hahndorf Traffic Improvements	Jun-27	$ 250,000	**$ 19,000**	$ 4,000	$ 40,000	Jun-26	36,000	1 year
High Productivity Vehicle Network (SA) — Planning	Jun-24	$ 17,000	**$ 6,943**	$ 6,100	$ 10,500	Jun-23	4,400	1 year
Hindmarsh Stadium Upgrade	Jun-25	$ 45,000	**$ 1,200**	$ 20,677	$ 13,500	Dec-22	- 7,177	3 years
Horrocks Highway	Jun-25	$ 91,722	**$ 20,000**	$ 22,500	$ 29,092	Jun-24	6,592	1 year
Increased Detection of Unregistered and Uninsured Vehicles	n.a.		**$ 671**	$ 3,094	$ 655		- 2,439	
Kangaroo Island Road Upgrades	Jun-24	$ 32,000	**$ 20,302**	$ 8,000	$ 6,000		- 2,000	
LeFevre Peninsula Upgrades	Jun-27	$ 100,000	**$ 20,000**	$ 2,500	$ 30,000	Jun-25	27,500	2 years
Level Crossing Removal Planning Program	Jun-24	$ 10,000	**$ 4,893**	$ 5,000	$ 8,500	Jun-23	3,500	1 year
Main South Road Productivity Package	Jun-26	$ 20,000	**$ 2,000**	$ 500	$ 5,000	Jun-25	4,500	1 year
Majors Road on-off ramp	Dec-25	$ 120,000	**$ 30,000**	$ 5,000		Jan-23	- 5,000	1.5 years
Marine Package	Jun-24	$ 33,930	**$ 6,000**	$ 14,000	$ 16,937	Jun-23	2,937	1 year
Marion Road — Anzac Highway to Cross Road	Jun-27	$ 400,000	**$ 13,500**	$ 11,500	$ 5,000		- 6,500	
Marion Road and Sir Donald Bradman Drive Intersection Upgrade	Jun-27	$ 85,000	**$ 36,000**	$ 2,500		Jun-29	- 2,500	2 years early
Mike Turtur Bikeway	Jun-27	$ 35,000	**$ 5,000**	$ 500	$ 26,016	Jun-24	25,516	3 years
Mitcham Hills Corridor — Old Belair Road and James Road	Jun-26	$ 20,000		$ 30	$ 17,138	Jun-23	17,108	3 years
Mitcham Hills Upgrade Program	Jun-25	$ 20,000	**$ 6,340**	$ 4,760	$ 9,895	Jun-23	5,135	2 years
Mobile Phone Detection Cameras	Jun-24	$ 6,071	**$ 6,071**		$ 1,500	Jun-23	1,500	1 year
Naracoorte Roundabouts	Jun-24	$ 14,600	**$ 2,750**	$ 8,000	$ 4,800		- 3,200	
National Centre for Sports Aerodynamics	Jun-24	$ 15,481	**$ 5,786**	$ 8,572		Jun-23	- 8,572	1 year
Netball Stadium Upgrade Works	Jun-24	$ 12,000	**$ 11,700**	$ 300	$ 750		450	
North East Public Transport Park 'n' Rides	Jun-24	$ 59,871	**$ 1,300**	$ 3,489	$ 1,500		- 1,989	
Northern suburbs local roads	Jun-24	$ 5,000	**$ 4,500**	$ 500			- 500	
North-South Corridor — Darlington Upgrade	Jun-25	$ 709,500	**$ 415**	$ 3,000	$ 2,000	Jun-24	- 1,000	1 year
North-South Corridor — Northern Connector	Jun-24	$ 847,000	**$ 500**	$ 4,000	$ 3,000		- 1,000	
North-South Corridor — Regency Road to Pym Street	Jun-25	$ 284,000	**$ 500**	$ 1,000	$ 1,000	Jun-23	-	2 years
North-South Corridor — River Torrens to Darlington	**Dec-31**	**$ 15,400,000**	**$ 704,000**	**$ 390,000**	**$ 390,000**		-	
Nottage Terrace and North East Road Intersection Upgrade	Jun-23	$ 6,000		$ 2,643	$ 2,486		- 157	
Old Murray Bridge Refurbishment	Jun-25	$ 46,000	**$ 9,000**	$ 27,500	$ 25,000	Jun-24	- 2,500	1 year
Parliament House Western Façade Restoration	Jun-24	$ 1,818	**$ 1,318**	$ 500			- 500	
Penneshaw and Cape Jervis Ports	Jun-25	$ 37,000	**$ 15,000**	$ 1,800	$ 14,135	Jun-24	12,335	1 year
Port Bonython Jetty Refurbishment	Jun-25	$ 64,147	**$ 21,200**	$ 12,500	$ 16,225	Jun-24	3,725	1 year
Port Rail Spur	Dec-24	$ 56,400	**$ 39,400**	$ 5,500	$ 21,000	Jun-24	15,500	6 months
Port Wakefield Overpass and Highway Duplication	Jun-25	$ 124,500	**$ 1,000**	$ 2,000	$ 7,000	Jun-24	5,000	1 year
Portrush Road and Magill Road Intersection Upgrade	Jun-24	$ 98,000	**$ 300**	$ 2,000	$ 4,500	Jun-26	2,500	2 years early
Princes Highway Corridor	Jun-25	$ 190,000	**$ 76,000**	$ 47,000	$ 75,000	Jun-24	28,000	1 year
Riddoch Highway Intersection Upgrade	Jun-24	$ 5,000	**$ 4,850**	$ 150	$ 5,000	Jun-23	4,850	1 year
Road Safety Package	Jun-24	$ 315,000	**$ 22,655**	$ 51,700	$ 95,160	Jun-23	43,460	1 year
Road Safety Package — Regional	Jun-25	$ 155,500	**$ 11,000**	$ 35,000	$ 48,753	Jun-24	13,753	1 year
Roads of Strategic Importance Initiative — Cockburn to Burra	Jun-24	$ 62,500	**$ 13,201**	$ 16,000	$ 17,500		1,500	
Roads of Strategic Importance Initiative — Eyre Highway — Port Augusta to Perth	Jun-25	$ 94,000	**$ 18,112**	$ 15,000	$ 34,000	Jun-26	19,000	1 year early
Roads of Strategic Importance Initiative — Eyre Peninsula Road Upgrades	Jun-24	$ 51,250	**$ 5,965**	$ 10,000	$ 16,500	Jun-23	6,500	1 year
Roads of Strategic Importance Initiative — Renmark to Gawler	Jun-25	$ 87,500	**$ 18,000**	$ 38,000	$ 45,700	Jun-24	7,700	1 year
Roma Mitchell House Works	Jun-24	$ 8,100	**$ 3,100**	$ 4,877	$ 5,000		123	
School Crossings Program	Jun-24	$ 4,730	**$ 2,121**	$ 2,500	$ 4,460	Jun-23	1,960	1 year
South Australian Sports Institute — New Facilities	Jun-24	$ 86,832	**$ 75,033**	$ 11,423	$ 47,000	Jun-23	35,577	1 year
South Eastern Freeway Upgrade	Jun-26	$ 150,000	**$ 50,000**	$ 26,500	$ 41,000	Jun-26	14,500	
State Administration Centre Precinct Properties Maintenance	Jun-24	$ 20,200	**$ 15,916**	$ 4,250	$ 15,865	Jun-23	11,615	1 year
State Administration Centre Upgrade	Jun-24	$ 12,250	**$ 1,259**	$ 1,851		Jun-22	- 1,851	2 years
Strzelecki Track	Jun-26	$ 215,000	**$ 55,000**	$ 50,000	$ 66,000	Jun-25	16,000	1 year
Targeted Investments to Improve National Supply Chain Resilience	Jun-26	$ 75,000	**$ 31,250**	$ 4,000	$ 12,500	Jun-25	8,500	1 year
Targeted Road Safety Works	Jun-23	$ 59,500		$ 537	$ 3,125	Jun-23	2,588	
Tea Tree Plaza Park 'n' Ride	Jun-25	$ 43,500	**$ 23,000**	$ 11,500	$ 24,000		12,500	
Torrens Road, Ovingham Level Crossing Upgrade	Jun-27	$ 230,457	**$ 8,000**	$ 52,500	$ 27,000	Jun-24	- 25,500	3 years
Transport Demand Model Upgrade	Jun-23	$ 6,000		$ 2,474	$ 2,609		135	
Truro Bypass	Jun-27	$ 202,000	**$ 45,000**	$ 5,000	$ 40,000	Jun-26	35,000	1 year
Urban Growth Fund — Planning and Jun 2025 Construction	Jun-25	$ 13,998	**$ 2,566**	$ 6,954	$ 535		- 6,419	
West Croydon Pedestrian Rail Crossing Jun 2024	Jun-24	$ 2,500	**$ 2,350**	$ 150	$ 1,500	Jun-23	1,350	1 year
Wynn Vale Drive upgrades Jun 2025	Jun-25	$ 6,000	**$ 4,300**	$ 700			- 700	
Small projects n.a.			**$ 2,896**	$ 17,701	$ 19,521		1,820	
Total existing projects		**$ 24,772,459**	**$ 1,974,099**	**$ 1,638,944**	**$ 2,030,098**		391,154	

Error found in Budget Papers	$ 3,795
Total	**$ 2,033,893**

Projects revised completion date 6 months to 3 years	**51**
Project revised completion date - earlier completion	4
Total Project Reprofiled	**55**

GARP QUESTIONS

Q.1 How should Greater Adelaide grow?

The GARP will identify growth over a 15 to 30–year period by investigating and guiding:

- Where houses and employment land will go
- How housing and population will be serviced
- Which areas need conservation and protection
- What major infrastructure is needed and how it will be provided

- What do you think of the four outcomes guiding how Greater Adelaide should grow?
    - The four outcomes are: A greener, wilder and climate resilient environment, a more equitable and social – cohesive place, a strong economy built on smarter, cleaner regenerative future, a greater choice of housing in the right places.
        - Are there any other outcomes the commission should consider?
- What other major trends and drivers might shape the future of Greater Adelaide?
        - How should land use plan address these trends?
- What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?
- What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?
- What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?
- What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?
- What neighbourhood features enhance living and working locally?

INFRASTRUCTURE – IDEAS PROPOSED

Q.2 Where should Greater Adelaide grow?

- How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?
- What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?
- What do you see as the benefits of greenfield development?
- What do you see as the potential drawbacks of greenfield development?
- How can infill development achieve an urban form that is consistent with the principles of Living Locally?
- What do you see as the benefits and potential drawbacks of infill development?
- Where is the next generation of strategic infill sites?
- What does the Greater Adelaide Regional Plan need to consider to meet future demand for employment land?
- What does the Greater Adelaide Regional Plan need to consider to meet future demand for open space?
- What does the Greater Adelaide Regional Plan need to consider when reviewing and achieving the Urban Green Cover Target?

INFRASTRUCTURE SUMMARY FROM THE REPORT

Planning for growth is complex. The availability and cost of infrastructure and services is a key consideration for determining where growth should occur. But we need to balance these costs against other considerations, such as the protection of environmental and agricultural land, and the protection of residential amenity. "The Identification and prioritisation of growth areas will be based on the transparency of costs to community (infrastructure provision, housing cost, ongoing living costs and climate change resilience costs) for differing forms of supply."

In the past, infrastructure provision has not always been timely. Better integration of land use and infrastructure to direct urban development to the most appropriate locations will help maximise the use of existing infrastructure and services. It will also help us plan for new infrastructure before rezoning land.

The longer-term growth options identified in Part 2 capitalise on significant ongoing government investment in roads. These include the North-South Corridor project, Northern Connector Project and the Fleurieu Connectors Project (Main South Road and Victor Harbor Road duplications). Other important infrastructure investments include super schools at Aldinga and Angle Vale, and water secured through the Adelaide Desalination Plant.

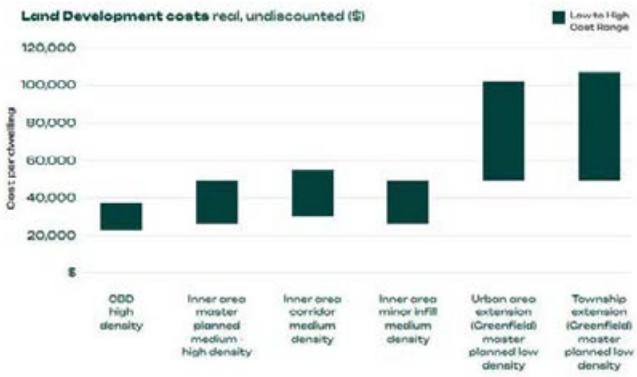
Infrastructure cost

The Commission is working with Infrastructure South Australia (ISA) to identify infrastructure cost differences between infill and greenfield development. The work of ISA and other infrastructure agencies around Australia shows land development costs in urban and township extension areas can be significantly higher than land development costs in established residential areas.

Development of new greenfield areas costs more due to the need for new local roads and stormwater management systems, trunk infrastructure and earthworks. Although it can vary, ISA modelling suggests infill development will typically cost less than greenfield development.

But cost is not the only factor directing where growth will occur. The impacts of infill on local communities can be high, including tree loss and impacts to heritage and character, and loss of privacy and amenity.

Figure 4 – Land development cost comparison
Source : Infrastructure SA



Total costs of housing and infrastructure

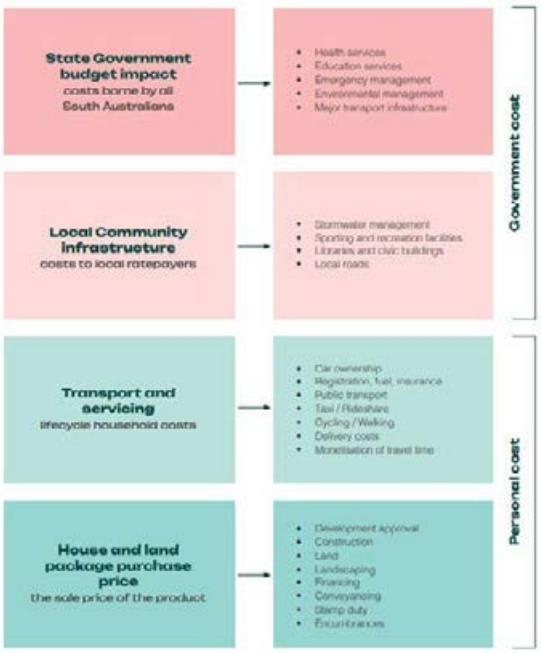
Affordability and perceived value for money often drive our decisions about where we want to live. Other influencing factors include age, family size, family ties, income, and connections to a community.

Buying new housing in greenfield estates is often cheaper than buying in an established area. This is relevant if the household aspires to a larger detached home, as has been a historical preference of first home buyers and young families. New growth areas can give these households more affordable options.

An Infrastructure Victoria analysis has confirmed that reduced access to infrastructure makes greenfield areas more affordable initially. Established areas carry a premium due to their proximity to infrastructure such as train stations and activity centres offering convenient access to services and employment.

Decisions are based on the total cost to community need; however there is the need to consider not only the purchase price of a home, but also the ongoing living costs for households, and the broader costs to the community. Figure 5 summarises these costs.

Figure 5 – Infrastructure cost schematic



Infrastructure in Established Areas

In established areas, focus growth on locations with existing infrastructure capacity, or in locations where infrastructure can be planned and augmented in a cost effective and orderly manner:

- *Prioritise strategic infill sites, which are usually more economic to service than general infill;*
- *General infill will play an ongoing role for housing supply but the focus will be on locations where there is capacity in infrastructure networks;*
- *Investigate the use of infrastructure schemes to establish developer contributions for infill and regeneration areas.*

Infrastructure in Greenfields Area

Carefully plan and sequence growth and infrastructure to ensure timely access to services and amenities for new communities:

- *Build on existing infrastructure capacity in townships, where local councils have identified growth opportunities;*
- *Prioritise the orderly expansion of existing urban areas and satellite cities, where this builds on existing services and infrastructure, or where we can provide efficient augmentation/infrastructure delivery;*
- *New master planned communities, not connected to an existing area, will play an important role in future growth but they will:*
  - *incur greater community costs due to the delivery of new trunk infrastructure;*
  - *require careful planning to ensure infrastructure can be provided and funded in a timely fashion;*
  - *funding mechanisms established to facilitate appropriate provision of amenity and services.*

DTI:PlanSA Submissions

From: Community Alliance SA Inc. <sa.community.alliance@gmail.com>
Sent: Sunday, 5 November 2023 6:18 PM
To: DTI:PlanSA Submissions
Subject: Community Alliance SA (CASA) Submission to the GARP
Attachments: CASA FINAL Submission to GARP Nov 2023.pdf; CASA Submission to Expert Panel 221216.pdf

You don't often get email from sa.community.alliance@gmail.com. Learn why this is important

Dear Craig and team
Please find attached the Community Alliance SA's submission to the GARP. It includes a great deal of information already provided in the submission we sent almost a year ago to the Expert Panel, which we have attached for your reference.

We look forward to receiving feedback about both submissions.

Kind regards
Dianne

Dianne van Eck
President

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Community Alliance SA Inc.
Website: http://communityalliancesa.org.au

Email: sa.community.alliance@gmail.com
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Community Alliance SA Inc
PO Box 520
Goodwood, SA 5034

Engaging for Reform
Community Alliance
South Australia

5 November 2023

To the Chairperson of the State Planning Commission (SPC)
Mr Craig Holden

RE: Submission to the Greater Adelaide Regional Plan (GARP)

Dear Craig,

Thank you for the opportunity to present this submission to the SPC. Our members reviewed the GARP Summary Discussion paper which was easy to read and understand. We held a member workshop in September to discuss each of the questions posed in the Summary Discussion Paper and from that we prepared a draft submission. Members reviewed our draft and provided feedback and further information to inform this final version.

Member groups have also discussed the GARP within their own groups, and some will also provide feedback separately to you. We commend other member groups' submissions to you.

We have attached our final submission to the Review of the Planning Act and Code, of which we have heard no response from the Government. We find it quite difficult to understand why the Minister has not, at the very least, released a 'We have Heard' document in response, or better still, the Final report with recommendations. The community spent a great deal of time and effort preparing submissions. It is quite disrespectful of the community consultation process itself to be treated this way. The consultation process was a very good one, but now, in not having released ANY findings from that consultative process, we are providing further feedback to another, equally important plan without any knowledge that our feedback has been considered.

You may wonder why the community becomes cynical and discouraged! Our submission to the Expert Panel Review includes feedback and information relevant to the GARP, so we suggest that the Expert Panel submission is read in conjunction with this one.

QUESTION 1: WHAT ARE SOME OF THE TRENDS AND DRIVERS WHICH MAY CHANGE THE FUTURE FOCUS?

1. The need for increased and appropriate public transport

It is essential that increased and appropriate public transport is planned and funded prior to the development in new areas. The example of Mt Barker (which is a case study for how to do everything badly) shows that without increasing public transport options in any targeted region, more cars are required which creates increased traffic congestion, pollution and people's frustration. Public transport must be smarter and cleaner, and included in all suburbs, and in particular where there are growth suburbs. There is also a need to improve transport

infrastructure particularly in the suburbs, eg park n rides, bicycle lanes and pedestrian pathways to enable a variety of transportation modes and greater emphasis on reducing motor vehicles on the roads.

2. Requirement for agricultural and rural lands to provide food and resources
Without agricultural land there will be no ability to grow our own food for the increasing communities. There should be sufficient land available to ensure we do not need to import food from China and other countries.

The Friends of Willunga Basin had a great deal to do with the creation of the Character Preservation Zone and the whole necessity of thinking about what land is needed for agriculture if the Murray Darling Basin does lose 40% of its water as has been forecast with climate change. The statement says that the preservation areas and the agricultural areas need to be excluded from further growth. We are somewhat skeptical that with the massive upgrades of the roads down to Sellicks, the government will continue to nibble away at some of these rural and agricultural areas. We therefore support the retention of agricultural and rural lands to ensure future food supply. Agriculture also needs ecosystems provided by natural habitat. At least 30% is required to maintain our current systems. We are asking for habitat to be built on the land proposed for housing and the low production grazing and cropping paddocks of the Willunga Basin to achieve this.

3. Impact of increased population
A National Immigration Program will have a big impact on the population size of our states and cities in the next 30 years. Population growth is currently running quite high. South Australia's population has increased and is predicted to continue to increase. This growth is at a time of global warming. The population driver is an important issue to consider. Given that the government has stated that we need an extra 300,000 new dwellings over the next 30 years, based on their population projections, we do not see the evidence for this need. We do not know if this is a low, mid or high projection so further details and analysis on population numbers is essential to provide reliable and valid evidence to support the national (and state) growth plans.

There is a section on this in the CASA member group, SWWAN submission (p13-15). The government has said we MAY need 300,000 homes. This is for the unlikely high population projection of 672,000. They are also using a very low people per dwelling 2.24, historically Adelaide is around 2.4. It may have dropped to 2.24 during Covid but we think it is more reasonable to use the historical figure.

The expected medium growth is only 489,000-growth, which is only 218,000 homes. This is very achievable through current stock, infill and strategic development and no greenfield development. This is the most likely scenario of population growth.

Here is the link to the statistics:
https://plan.sa.gov.au/state_snapshot/population/population-projections
(At the bottom is data which are excel sheet downloads for each projection.)

4. Consideration of decentralisation of growth from the GAR to regional towns

There is no consideration of other regional centres for growth plans in the summary document, other than Murray Bridge, Callington and Victor Harbour. In Victoria there are many large rural towns which are regional centres eg Hamilton, Geelong etc where these large towns have all of the services and employment opportunities for residents. The South Australian population is concentrated in Mt Gambier, Pt Lincoln and Whyalla and then very focused on Greater Adelaide. The GARP does not take into account the whole state and thus is quite a myopic view, placing more pressure on the city's urban sprawl. These outer regional towns would benefit from population increases and greater employment opportunities, and indeed further development and reduce the pressure on the city.

Satellite cities should be included beyond Murray Bridge. One example of a town which could benefit from appropriate and carefully planned development is Tailem Bend. It has the freeway adjacent and sufficient surrounding space to plan an imaginative small city. The race track attracted 20,000 visitor to one event in October so more people are noticing it.

It is good to be moving away from a principle of cramming 85% of new population into infill in Adelaide. The document states that normal infill will continue but more as strategic infill and satellite cities. We agree with this approach. However, the focus of the document should extend to other regional centres as part of the contribution to new housing and employment and exclude Victor Harbour. People need jobs and this is one of the reasons people are leaving rural areas. Our member group, SWWAN's plan to prioritise environmental restoration creates jobs in regional areas both directly through employment and indirectly through service provision, where every employee becomes a customer when they knock off work. It also creates tourism opportunities.

5. Public transport and travel routes must be available

Victor Harbour is a tourist town and for many, a retirement lifestyle. It does not have much more vacant land to grow without impinging on beautiful tourist areas. It seems illogical to try and grow a population in a tourist and retirement town. We do not agree with including development in this town in the GARP. The road to Victor Harbour is only now becoming dual lane and will be extremely busy without further development. There is no rail service and minimal bus services between Victor Harbour and Adelaide. You will create a duplication of the Mt Barker transport and traffic issues if you develop Victor Harbour further. It needs a railway line with a move to carbon neutral. It is lunacy to consider expanding into an area where the public transport is minimal and has very limited chance for development due to the terrain and cost constraints. Surely this must be one of the lessons learned from the Mt Barker fiasco and the current public transport and traffic management issues there? The lack of transport and greater pressure on existing towns in the region that have infrastructure needs to be carefully considered.

This GARP plan should have more details about transport and traffic matters as part of the consideration of the overall plan.

6. Increasing pressure on small towns in the path of urban sprawl

The plan is named GARP and leaves out the regions so is Adelaide city and suburb centric. The document states that Adelaide will be urban sprawl to Murray Bridge and Victor Harbour but retain the character of towns in between. How will this happen? We believe those towns will simply be swallowed up into the sprawl. Goolwa is targeted for major expansion. It is too

small to take the pressure. Middleton and Pt Elliot are already jam-packed blocks of housing, with massive increases of population in the summer months, putting extraordinary pressure on roads, businesses and facilities. This is not sensible planning. It does not make communities happy. Existing communities feel powerless and new people to the community feel cheated because the growth plans were not made clear to them.

The document says the Government plans to revisit Gawler and Mt Barker at a later date because the infrastructure will have been put in place. This will place even further pressure on these two towns as well as increase the pressure on the road and public transport linkages between the two. The public transport options for Mt Barker to the city are already woefully inadequate with no real plans or budgets to address this in the next few years. Yankallilla, Goolwa, Nairne, Littlehamption are all under pressure.

We note that ringing around the Barossa to exclude it from further growth is a good thing.

7. Tension between local planning and state level planning.
The report talks about locationality eg walkability which would be Local Government issue in the past, but the State planning system has a 'one size fits all' method. How are they going to implement this plan, if consensus is required? Are you using the Planning and Design Code and state initiatives or are you going to give the planning requirements to Local Councils to implement? It is easy for the State Government to set the parameters and then Local Government has to implement it and confront angry residents who did not know what was happening in their area. The State Government must liaise with the Local Councils more to ensure future plans can be implemented within a partnership arrangement so that the cost burden and responsibility does not lie solely on Local Government, such as has happened in Mt Barker.

The cost burden for a lot of this is going to need to be shouldered by the State Government. Responsibility needs to be coordinated between the two levels of government and the Federal Government too as much of what is needed in the future will also be beyond the State Government's capacity. An integrated approach is essential.

8. Impact of new technologies
Electric cars, smart forms of transport, people working from home more and faster internet including AI will transform how we work and live. Regionalisation is good for the environment and we should consider this more as the technologies allow for this approach to work. This will allow regionalisation and move away from ad hoc and disjointed city/suburban infill and move back to regional development. Large plot urban infill is needed (not piecemeal infill) and the fringes of Adelaide need to be restored as habitat to protect our biodiversity and food security.

9. Do infill better
What has happened with the process in the earlier 30-year Plan where infill was important and not fringe development? There is still a lot of capacity for strategic infill. Previous governments spent a lot of time and money on TODs and now you are suggesting we go to Victor Harbour! It is myopic planning and thinking.

There must be no extension of the TODs into the heritage suburbs. Claims are circulating around Unley the TODs with their high-rise allowances will be allowed to extend two blocks into the suburbs and TOD roads allowed on through streets like Fisher and Wattle in

Unley. There have been so many articles by the building industry claiming the number of houses set by government to be built are unrealistic due to lack of building skills and lack of building supplies and if planning legislation is change to allow this extension of TODs. It will destroy these areas and piecemeal destruction will occur.

The design of the current infill has received public backlash in many areas. The government is not doing infill very smart. There are better ways to have design friendly approaches and protecting heritage at the same time is possible. We ask that you consider this, as it is not too hard. You can design infill with sensitivity around character heritage. We do not have much of this in Adelaide and so we just keep building large skyscrapers without consideration of the local area, character, streets etc.

There is not much consideration of 'whole of area' design. It's just about maximising development dollars for a few people to become richer to the detriment of the community around these developments. Infill if done well can complement existing areas and provide a cross section of living spaces for a diverse community. We believe that some large developers are not following the rules of the Planning and Design Code and are trying to break or avoid them. There need to be consequences for developers who do the wrong thing. Significant fines should be imposed and the plans rejected for designs submitted outside the design code. This would be a good way to curb this anti-community behaviour. Of course, the SCAP must not allow developments to pass that do not meet the Code and Act requirements either.

This lack of whole of area design is very apparent in the policy towards development in Main Street precincts where Catalyst provisions prioritise density of development, especially height and bulk, but assume somehow that these will be good for a main street's economy.

A whole area design would purposely design for a lively Main Street, and there is a wide body of research and experience to suggest that human scale is a critical quality of successful main streets. To put that another way, our concern is that the current Catalyst Policy, by ignoring human scale, is a serious threat to the vitality, economic and social, of our main street precincts, and that the viability these areas is vital for metropolitan Adelaide.

These special areas need 'whole of area' design to protect them, and our view is they should be given special treatment as special economic zones.

2. HOW SHOULD A LAND USE PLAN ADDRESS THESE TRENDS AND DRIVERS?

Land use planning should incorporate all of the elements of daily living: housing, employment, transport and traffic, infrastructure, access to goods and services, character, and community. There needs to be far greater sensitivity to local character and agricultural and food producing areas when considering land use planning. The relationship between the proposed land use and existing communities must also be considered. The human footprint is important.

Consequences for doing the wrong thing should be great. One example of not considering the character area was where a developer stated he would not demolish a building. The site lay vacant with the demolished building before planning approval was announced. This is misleading the local CAP or the SCAP and is wrong. When developers do not do what is required, there should be some either policing of it or consequences arrived from it. At the moment it is very easy to get away with doing the wrong thing. Thus land use plans need to be

adhered to by all parties and particularly developers.

It is clear now that the government is going to do more green fields development, but they are still not considering the essential food and water security and food production areas. The existing land production areas were to be protected with the previous 30-year plan. It is clear that is now going to change. We thought there were boundaries set to protect these areas in the previous 30-year plan but now once again the food production areas are at risk. Clearly those were just temporary boundaries.

Food production areas are already at their limits of arable land. Vegetable production is being moved from Virginia to Mallala. Water and sewerage are being sent there for that purpose. It's insanity! Why can't we do something like in Switzerland? When land exchanges hands, the use stays the same as it was eg for agricultural and food production. We are rezoning our food producing lands for public land and then rezoning it for housing. This is happening at Imman Valley too where there is good farming land on the way to Victor Harbour just before Sellicks. This land is being lost to housing as well. Mt Barker was a prime food production land location and lost to housing. It's devastating for our future. Our member group SWWAN's submission makes a detailed argument as to why greenfield housing must be stopped. Their arguments are good and soundly based on the latest science and urban planning thinking. The arguments for greenfield are outdated, weak and full of holes.

There needs to be consideration to the development of urban forest area for the land to the south of Adelaide. We need to grow more trees. Urban forestation has been included in the agenda. All of this land should be used to develop the urban forest, holding onto them, reusing them for foresting. All the land should be put aside to reverse the extinction crisis.

There should be concern about cramming people into small buildings in the Adelaide Hills regions which is a bushfire zone. Bushfire prone areas should have a moratorium. Do not put people there and put them at risk.

When planning future land use make sure transport corridors are planned also so reserve the transport corridors for the future. Retain the railway corridors for future transport and not just walking trails. There need to be corridors that are wide enough for freeways and rail routes. Problems will be exacerbated further without adequate transport networks.

We note the vast tracks of agricultural land that you want to turn into greenfield development. How much agricultural land do we need for future population growth? There is no evidence in the plan about how this will be addressed. Where is the evidence to consider these matters appropriately? There must be a focus on retaining existing food production. We cannot afford to keep losing agricultural lands. Why does the government place such little importance on this?

3. HOW CAN GREENFIELD DEVELOPMENT ACHIEVE AN URBAN FORM THAT IS CONSISTENT WITH THE PRINCIPLES OF LIVING LOCALLY?

There must be employment developed alongside housing. We need employment locally for many good reasons. We are concerned that we will put people at Callington, Goolwa or Victor Harbour and have very little employment. There are few services at Goolwa. You pick these

sites but what will keep people employed? How did you select these sites? Was it the developer's influence, similar to what happened at Mt Barker? Will people from Victor Harbour drive to Adelaide for employment? Is the presumption that people will work from home? This needs to be considered further.

A multiple Generational plan to 'Rewild the Fleurieu' will provide decades of employment and a large economic boost for our regional towns supporting larger populations. Better connectivity, better services and better employment opportunities must be built into expansion of regional towns not added on later. Last week there was a federal government report looking into why new arrivals leave the regions after 3 years and these were the main reasons discovered. Planning must include these issues.

Master planned communities are squashed up dog boxes with little green trees and not much else. We do not need any more of these. They are not good examples of careful urban development that is sustainable. We must plan carefully and ensure jobs, open space, trees are all retained in any greenfield development. We suggest looking overseas for best practice examples.

We believe you should not do further greenfield development. Many of those areas risk becoming dormitory suburbs. People travel out of the area to go to work in the city and return at night. It exasperates existing traffic problems and creates further congestion problems. We do not want more of this. Greenfield development is an enormous problem for our community.

The Living Locally principles (p86) – walkability, housing stages, public transport are good principles. Local jobs are needed and wanted. Country towns are looking for skilled labour so why not plan some growth there? Working in regional towns is a good thing. While we have immigration, we need to find housing for them. But this should be in a liveable, sustainable community. The root cause for needing more land for housing is population. The GARP is based on the assumption that population must continue to grow for economic development. That is not sustainable for a future world. This thinking needs to change.

CASA is pleased to be able to support the objectives underpinning Living Locally. We are particularly pleased to see a sense of community included in this assessment, as the definition of living locally and liveability has moved beyond transport issues customarily put forward by the planning profession. For instance, when residents decide to live in the city, they value the ease of walking around, many parks, trees and tree-lined streets, cafes and restaurants, and being safe and secure. What they disliked about living in the city was the noise and lack of car parking. The residents living in high-rise apartments are attracted by the low maintenance required by their accommodation, closely followed by the 'lock up and leave' factor. The lack of car parking for visitors was the least attractive feature of living in a city apartment.

CASA supports resident-centric planning, switching planners' focus to broader concerns beyond population size and growth. Several methods can be used to benchmark Australian cities and establish a liveability index for each city and subdistrict. These indexes recognise that different people in different places will have different opinions regarding what contributes most towards making a good place to live and how they perceive their experience. Considering the interaction of these elements, CASA believes that putting residents' values

and experiences at the centre of any attempt to understand liveability and advance the quality of life is appropriate–and necessary – to deliver growth policies that create meaningful impact for the community. In this way people can be part of the planning process.
There is a tendency for government plans to have a developer mindset and, therefore, a bias towards the development process, which could easily result in a "skewed" approach. For example, housing should not be adjacent to existing parks without the appropriate conditions, such as it does not restrict, dominate, or detract from the public's access and use of the park or river corridor.

CASA prefers a resident-centric approach rather than a place-based approach to local planning, which is essential to retain the high level of liveability The missing component in the current system is the impact of higher development on existing communities. With a program of benchmarked residents' liveability assessment, it can now become part of the planning process, which can move towards co-planning to achieve the desired increase in population in this wonderful part of the world.

With benchmarking tools now available the liveability index can become part of our planning assessment process through both State Planning Assessment Panel (SCAP) and the council level assessment panels (CAP).

4. WHAT IS THE IDEAL URBAN FORM TO SUPPORT THE GROWTH OF SATELLITE CITIES LIKE MURRAY BRIDGE OR VICTOR HARBOUR?

We have learnt from the Mt Barker fiasco, what is NOT the ideal urban form. We have been able to document that in the Expert Panel review submission last year. Although Murray Bridge has a lot of land that can be used for some form of agricultural, there is a lot of land that may not be as arable as that at Mt Barker, thus it can be designed for some further growth areas. There are large tracts of land within the town boundary that used to provide vegetables and other food provision in the past. These are being converted to housing estates, but there must be a balance. The area also has less rainfall than the Mt Barker region and is also ideal for large-scale employment possibilities. However, there needs to be a careful balance of land use for housing versus improving the environment. A lot of the land at Murray Bridge should be revegetated and not built upon. This will help the larger project of repairing the environment and keep the area cooler, something that will be very important in years to come.

Murray Bridge is a large regional city with large roads and space to move. Some developments have large houses on small blocks with no trees, but it does not have to be designed that way. The principle for developing any of these new areas ought to be that they do not create these ‘dog boxes’ on blocks with no gardens and do not create more satellite suburbs in those cities as well.

Is it the government’s intention to keep the Monarto land as heritage listing due to the native vegetation? We could lose all of Monarto to become that city that was planned so the risk is to lose biodiversity and native vegetation in that process. We need to be mindful of heritage elements and the built form. We also need to consider the landscape and vegetation and biodiversity loss. We lead the world in extinction now. We need to be more aware to preserve vegetation or we will lose everything.

The 1700ha Monarto Woodlands were declared a Conservation Park in 2014. In addition to protecting everything that is left we need three times as much new habitat. Most particularly we need to replace the ecosystems that were cleared the most ie those grassy woodlands where our towns and farms now are. We cannot restore habitat in the cities so it has to be the farms where restoration must occur.

We will have to get used to the idea that we will have to go up (2 to 3 stories) in regional places. We cannot have walkable suburbs that are vehicle dominant. In country towns vehicles dominate. Decent quality row housing with space around it can be an infinitely better built form with a communal park within walking distances. There are many English and Dutch villages where this design works very well.

Victor Harbour and Murray Bridge are quite different cities to be chosen for growth. Victor Harbour is quite constrained with not much space left to expand. Development is already nibbling into farming land. Further development here must not proceed. The developments are already spreading down the coast and joining Victor Harbour, Middleton, Pt Elliot and Goolwa. There is significant risk of losing the identity of these towns, despite saying you will preserve the towns. It is almost a bit late for some. Middleton is lost and merged as a suburb already. How will you preserve the towns if they are swallowed up into the urban sprawl? The same situation occurred at Mt Barker, Littlehampton and Nairne. The only thing separating Littlehampton from Mt Barker is the SE Freeway. Ensuring those towns retain their distinct characters and identity is important. It makes our state attractive to tourists. Why would we risk losing this? Further to this, if tourism dollars are an important deciding factor, which they are, then one of the best things we can do is prioritise environmental restoration and nature tourism.

We ask if you have gone down to these towns and talked to the people that live there? It is important to get their opinions. Be proactive about this please. Kapunda, Goolwa, Victor Harbour - what do those people think would work best for them? The GARP needs to include discussions with the people where they live in those communities and ask them. What do they want? We hope the SPC is reaching out to those communities to find out how they feel about growth and change in their local areas. Our member groups will likely contribute to that discussion with their local communities. We hope the local communities in these regions submit with their ideas.

5. WHAT DO YOU SEE AS THE BENEFITS AND POTENTIAL DRAWBACKS OF GREENFIELD DEVELOPMENT?

We answered this in the Review of the Planning Code and Act submission last year.

You could create something nice if you planned it well but do not want to lose something good to create a greenfield development. Eg loss of agricultural land, loss of open space, blending of towns, lack of transport and infrastructure.

There are lots of benefits for developers as greenfield development is low hanging fruit for developers. They will always go for these as they have a clean slate, they chop down all the trees and do what they like. They do not have to worry about heritage, roads etc in existing areas which is more difficult and more expensive.

Greenfield developments have typically focused on the need for cars. We should be getting rid of cars but we are not going to get rid of cars fast in Australia. A lot of the greenfield plans are atrocious around how to manage transport in local streets. In some areas there are developments that are dangerous because of the amount of traffic going down some streets. The streets are unsuitable – too many cars parked in them, too narrow for easy and safe access. You need to get this better. The current Planning Code has nothing in it, in terms to consideration for local streets.

A good practice example is: Pt Willunga, Brighton to city access via public transport (train). This is inexpensive for seniors and is an excellent public transport service. This type of service is needed in more places. We do not have the transport corridors for more trains as we have filled the land with houses and roads.

We need rigorous transport master plans to plan for better transport to and from and in and around developments. We have a blockage about planned communities; if you do it better you can succeed. There is evidence of planned communities that have failed eg Monarto and MFP and Mt Barker. We have lost the will, or we do not have the organisation, or we have an inbuilt suspicion to deal with overflows of population. Will you hear our voices? There was extensive feedback from the Mt Barker community to the Greater 30 Year Plan and the development there. SPC needs to understand that they have to learn from their mistakes and there are plenty of those mistakes. You can do this much better.

We ask why the term 'Master Planned Community' is translated into dog boxes jammed up against each other? This is now being advertised on the radio 'Come up here and join the rural life in a Master Planned Community'. There might be some single allotments and smaller ones for single people, couples and then a larger variety of housing for families. But they are all small boxes all jammed up against each other. People themselves are shocked when it happens. They thought it would be different and then they were disappointed but are locked into a 30-year mortgage with no room to move.

The city of Monarto did not proceed because the Whitlam government reduced immigration. This was a deliberate policy at the time as people started to realise that non-stop population growth has costs. Also people did not want to leave the city to move to 'the backwaters' (at that time) of Monarto. The Multi Function Polis (MFP) at Pt Adelaide failed because the Japanese economy slumped, and it had been planned to be a retirement home for Japanese people. So these external factors played a role in these failures. Mt Barker's failure was well and truly a government mistake, based on developer greed, with little or no planning for appropriate infrastructure.

With only 20% of the 1300 hectares developed and traffic, facilities and infrastructure already stretched to breaking point, along with limited government investment in rail crossings, major roads and other vital infrastructure, the rates continue to increase for an unsuspecting new population. Similarly the development at Pt Adelaide where there is a real difficulty to get people to purchase there. The towers are like ghettos. There is no heart and vibrancy that you would expect from a planned community. Even the Government's own staff would not move there!

With the development planned for Murray Bridge, there is a high risk that new homebuyers will build in Murray Bridge instead of Mt Barker, where prices are much more reasonable and traffic conditions far superior. What pressure will developers in Mt Barker place onto the government when that occurs?

6. WHERE IS THE NEXT GENERATION OF STRATEGIC URBAN INFILL SITES?

Some examples of potential next generation strategic urban infill include:

- Further development at Bowden/Brompton which has been successful.
- Elizabeth Shopping Centre precinct.
- Parafield Airfield.
- Use more derelict or dated sites for development. Old industrial sites that have fallen into disuse eg the old brewery.
- Look ahead and gentrify older (mid 60s) suburbs which is occurring in areas west of the city eg Lockleys.
- Some old Unley manufacturing sites
- Keswick Barracks
- Le Cornu site
- Islington Old Railway yards
- Bowden Brompton further development
- Not 15 and 16 stories in North Adelaide – this is too high for that precinct.

Further ideas to explore:

- Get rid of Stamp Duty on houses, moved to annual fee for land use, this would remove a disincentive for older people. This would remove many barriers to a more fluid housing market.
- Get religious institutions to pay rates and other fees which may free up some large holdings for housing.

In the GARP document there is reference to a large number of brownfield sites Eg Targa, Edwardstown. There are large blocks of land there, probably contaminated. If land is remediated it can be used again. This would be good for transit-oriented development with the railway line going past there. We believe there is a list of 300 sites that have been listed for urban infill. These should be explored in further detail.

Bernard Salt wrote that people over 30 are the people likely to move out of the city and seek to live in a traditional detached house with partner and children. Once this is over (empty nesters) they might consider coming back into the city to live. He suggests it is a lifecycle arrangement. People do not buy/rent the city apartment for life or move to outer suburbs for life. They may have several houses during their lifetime, and it depends where they are in their lifecycle and their economic circumstances what their housing choices are over their lifetime. So we need to consider land development and rezoning in the context of lifestyle choices and stages of life timing. This is another good reason for the land tax rather than the stamp duty. Allow people to move with their circumstances rather than facing a huge cost each time.

Kent Town area has been rezoned for 4 or 5 stories and 10 stories on main road. This becomes 7 or 8 stories if you add the bonuses for affordable housing and other incentives. That is happening at a reasonable pace. A lot of the development in that precinct is replacing warehouses from operations from previous decades. The Parade is zoned for 4 – 5 stories but again buildings over that height limit have been approved. A deal done between former Ministe Rau and the local council was to allow uplift in Kent Town to take pressure off single storey residential areas areas such as Joslin, St. Peters, Norwood.

The Kent Town area is probably an area where urban infill is working well and will continue to work well as it is a fairly dense area. In future years this continued development should take the pressure off the older character suburbs of Joslin, St Peters, Maylands, Norwood where urban infill is not welcome in those residential areas. If Kent Town is further developed (but ensuring retention of some of the heritage precincts, it is a good locality as it is close to the city, public transport and the parklands. The local council has a strategic plan to plant extra trees around these multi storey buildings and to put in new footpath paving and to encourage public art by the developers (to avoid a ghetto-like appearance).

The Nightingale Project in Melbourne and in Bowden Brompton is extremely popular. There is tremendous loyalty to this program. People love it and medium rise people feel welcome. It is not developer led, and this leads to community involvement and commitment. Sturt Street development (Christies Walk) is similar. The Melbourne model is about if you want people to live near public transport you have to go up and if the people design it becomes more liveable. We believe this is the idea behind the Urban Transport Corridor section of the GARP.

7. How can infill development achieve an urban form that is consistent with the principles of Living Locally?

The Nightingale Project example is a good one. They are making a distinction between strategic infill and ad hoc infill. See our Expert Panel submission for further information about this. The neighbors lose the amenity of a garden, the wildlife is dispatched, and the noise levels are increased. There is a serious and significant loss of amenity. It is slow and insidious and then one day, the life that was community focused and enjoyable is gone, with small streets filled with cars and difficult access. Infill is deleterious of the older neighborhood. We discourage this ad hoc random infill. We do not want piecemeal infill that occurs non strategically, house by house. It does not produce the desired impacts for communities.

How do we get a more Nightingale type development? How do get something different? Can we get something more sustainable? People are willing to build in what is being built and developers want to spend as little as possible. Mt Barker developments turned a creative landscape into small block sizes (150sq) so developers could cram more houses into the same parcel of land and make more profit. We need to change this thinking. It starts with the government and this panel. You can make a real difference.

8. WHAT DO YOU SEE AS THE BENEFITS AND DRAWBACKS OF GENERAL INFILL?

See our response to the Expert Panel for details. We believe Catalyst Sites need to go as they are excuses for bad development. How will we stop the dog box scenario?

Look at Dr Kent's Paddock at Kent Town. It was built in the 60s and 70s. Between the blocks of flats and single stories there are pieces of land so people can walk around, have open space

around the place. This is what is needed more – the addition of open space to allow you to breath, walk, see, hear wildlife, feel at peace in a busy area. Building to protect from urban heat is another very important reason.

We are opposed to 150msq dog boxes that are being built in Mt Barker. Nothing should be that small and landscaping is crucial, and space is needed around the house for the children to play and for deciduous trees to be planted. Villages in England and The Netherlands have row houses with big green belts around the housing. We need to have green belts between and around towns. We understand single people, or young families with not much money need a place to live, so affordability is important. We need to understand the needs and wants of all demographic segments in the market during their lifecycle.

An example of a parcel of land on Findon Road, which used to be the IGA warehouse. It is called St James, Kidman Park. It looks good. The houses should be 2 story so there is more land available on the ground. There will be uniformity for a certain vibe. Initially selling house and medium density on this area also. Strict rules on orientation, heating and cooling. It has been built on the premise of sustainability. Community and council have had a lot of input into the design. It has come up quite well because the consultation with community and council has been very good. Community says these places have to be sustainable, i.e. orientation, heights, shadowing, window placements etc.. There is some open space there and people will not be walking on top of each other. The river has quite an impact on the livability of the area. It is quite green and lots of work has been done on the Torrens to improve downstream effects and there is more vegetation and diversity .It's a large area and there are rules about what can be built i.e. use of timber and stone and elements allowed and not allowed.

Development is occurring at the West Lakes old Crows oval. The City of Charles Sturt have moved the library, real estate agents, café have moved there. It has been planned. Bowden Brompton has had an influence on more recent infill developments. It had a lot of community input to it and that has been used at West lakes. A lot of art and colour and green space has been included. There are parks across the road. The train services and Port Road with the tram also help. It's not that high – 4 stories are the maximum which is also good.

9. WHAT ARE THE MOST IMPORTANT FACTORS IN MEETING THE FUTURE DEMAND WITH EMPLOYMENT LAND?

You need employers who want to build premises and create employment. This is a burning issue for the CBD due to COVID and hybrid working. Office vacancy rates are increasing and foot traffic falling and some small businesses are finding it difficult. A resilient city is able to be resilient and responsive to change. The work patterns of the past will not be the work patterns of the future. Some office buildings could be changed to apartments in the future for those wanting to live in the city. The government should make this an easy conversion process.

Is this asking about employment lands in greenfield lands? Of the 1300 hectares rezone at Mt Barker, only 200 hectares was set aside for employment lands and that land has no employers on it. The land selected was totally unsuitable for employment as it has the greatest slope and more trees and creek lines than any other area. So in their haste to get the rezoning done these elements were not considered.

All forms of employment need to be considered before rezoning. Is it going to be polluting, modern, low key, light industrial? In Mt Barker there is an industrial area which could be turned into housing in the future. It is now employment in the wrong place because that area is needed for housing. Where do the employment lands go so that it does not keep on taking more countryside. What is there now? What is needed for the future? What employment can be sustained in a local area that will keep people there? Is this a Federal issue? This is privatized and offshored major employment industries. We only have small business and small manufacturing business in SA now so rely on other forms of revenue i.e. the Gather Round Football series, Mad March activities etc. Is this sustainable?

If you go to West Lakes and there are hardly any people in the Centre. This is because the Centre is not welcoming. People are buying online, and they are not going to the shops. Some of these shops and businesses have closed. The car parks are going to be snapped up for housing development in the future. How do we encourage businesses that are lost to overseas to come back to Australia? It is a major economic issue that needs to be addressed. The Mile End bulky goods center (used to be Perry's Engineering) is always busy and employs many people. People come from all over Adelaide go there. It is nicely set out with good car parking. It has trees and shady walkways and many large stores catering to home renovations.

The government decided to pull all administrative staff in payroll from country towns to centralise them in Adelaide. This was a bad move to remove employment from country areas. The government could reverse that decision and put those people back into those towns. The government should subsidise industries to open up in country towns. Industry will not come back to Australia if it has to buy expensive land. In Unley there is no industry left. The old Telstra site between Mary and Arthur Streets has been rezoned to become medium density housing. Some of the blocks have been made bigger and some of them smaller à la Mount Barker.

In Murray Bridge, where they are developing more land they should set aside land for employment opportunities. The government can subsidise industries and employ local people. People will build and live and commute to the city. Murray Bridge people are commuting to Mt Barker. Murray Bridge has the abattoirs and the gaol hires a lot of people.

The government supported local industry in the past eg Horwood Bagshaw. Hundreds of industries have been and gone. There are now new businesses in AI and IT but are employment lands needed for that? We sent that work offshore and now importing back. The Government can find money to build submarines and build a massive shed for building them, but people will not want to live there near nuclear work. Was this considered when developing Pt Adelaide?

Some jobs will come back to Australia eg Telstra bought its call Centre back to Australia as it was easier to manage here in Australia. There is also a push to revive some manufacturing eg minerals processing. There is a bit of a push to get some manufacturing going again if we can keep our electricity prices down. We need a whole layer of new industries to employ future generations. Restoring the environment will create thousands of new jobs.

Q10. WHAT ARE THE IMPORTANT FACTORS FOR THE COMMISSION TO CONSIDER IN MEETING FUTURE DEMAND FOR OPEN SPACE?

Climate change and the extinction crisis considerations should be at the top of the list. We need to stop building all over the open space. We need to ensure sufficient open and quiet space. We need to have parks, many without playground or other equipment. There should be a larger percentage of open space included in all new developments. There needs to be much more open space and large shady trees. Birds and reptiles need to be able to live, grow and support the ecosystem. There needs to be a balance of shade and understory. We need biodiversity.

Extinction is not reversible and if too many species go extinct our food security is severely threatened. Urban heat is going to be the biggest problem in the future. SInce 2018 Adelaide councils have set targets 50-90% below what they should have. This needs to be addressed immediately. For example the City of Onkaparinga has 2045 target of only 15%. Port Adelaide Enfield is 16%. SWWAN's 2nd submission details this mistake, how it happened and what to do about. We commend this to you.

West Lakes has a square piece of lawn with a water feature. In Holland they build houses around a central open space and kids can play together in a central area without parental supervision. Is there an opportunity here? Developments should design this in the right proportions to the size of the new community.

With increased density people need open space. As there is little, or no space for a decent garden on housing blocks, people need access to open space that is useful. Melbourne and Sydney people use parks a lot. Adelaide uses the Parklands and their local parks but there needs to be more of these, particularly in new developments.

Health and wellbeing are a high priority and social inclusion is essential. There needs to be an open space to do something in it and then can encourage community gardens to create social cohesion and wellbeing for people. The community garden near Henley oval has 60 people utilizing it now. It is great for social interaction. Events are held there and bring other people together. It creates more than just space but includes wellbeing and other activities. These should be included in new developments too and the developer should set them up and ensure they run well until handed over to the community.

Residents are claiming back open space. SECRRA has a tree planting experiment in Victoria Park and is working with council gardeners to keep the garden beds pretty. Some link Rose Park to Halifax Street. The European view of Nature is overpowering. And the restorative power and community value of nature is never underestimated. Neighborhood parks were used all the time – people playing, picnicking, where high dense populations have learnt how to use the park.

Chris Daniel's great work needs to be expanded further and include more projects and environmental activities. Insist in infill areas that we need decent street trees and landscaping around. We lost 100 trees in Norwood when the new 10 storey residential towers behind Coles near The Parade were built. The Caroma site development, although not great only lost a few trees there (this old industrial site did not have many trees, unlike the Coles carpark in Norwood where about 100 trees full of birds and possums were removed.)

Retail supermarkets funded that development. We need to insist that developers put greening on sides of multi-story buildings. They need to be made to do this by our planning bodies.

We need Adelaide's Urban canopy targets to be brought up to the minimum standards needed for the future. Our current targets are woefully inadequate. See SWWAN's submission 'Inadequate Urban Canopy Cover Targets'.

12. WHAT ARE THE MOST IMPORTANT FACTORS FOR THE COMMISSION TO CONSIDER IN REVIEWING AND ACHIEVING THE URBAN GREEN COVER TARGET?

Urban Green Cover targets are misinterpreted by Councils. Adelaide councils misinterpreted it as 20% increase of the current amount instead of a 20 percentage point increase in the number. This has resulted in Adelaide councils setting targets that are dangerous to human health in the future.

eg City of Onkapringa currently 12.5%
12.5 + (20%*12.5) = 12.5 + 2.5 = 15% by 2045!!!
It should be
12.5% + 20% = 32.5% by 2045.

Almost all Adelaide councils have calculated the target this way. This is saving a great deal of money, (CoO $7m annually) but certainly costing thousands of lives and huge cost in heat related illness and cost to the economy.

This has been a major contributor to developers being able to cut down trees so freely and is behind our ongoing canopy loss. You need to ensure that trees are not chopped down so easily. Increase fines for those who disregard the laws. Make it compulsory to any carpark that is being built should have trees added to the design. It would create a visual change and provide shade to cars.

There should be bushes on the footpath but need to have some rules around this so that responsibility is known about plants on the footpath. Verge planting should be encouraged. Unley Council does this well. Mt Barker council has an issue regarding the management of entrance gateway of new developments. The developer transfers responsibility to Council. This should be reduced, and developers should do more to update the public realm as they benefit from the sales of the properties in those developments. They should be made to stay connected to the community once their development has been completed.

As always, we are always happy to discuss these matters with you. CASA has access to many years of professional experience nationally, and even internationally. It represents a community across Adelaide and into the regions who care enough to engage regularly, never giving up to bring about positive change. Those projects that are successful almost invariably involve competent and substantial conversation with constituent communities such as CASA is offering. The converse is that those that fail, totally or in part, fail because of lack of substantial conversation with constituents therefore this process is only useful if you listen to these comments and concerns and continue to engage with the communities that feel the greatest impact of bad development decisions.

Land use and land availability ought not in the future continue to be subject to continued repetition of the ills and issues of past thinking of 'vastness' and planned 'land/resource wastage' that is endemic within the development industry.

Many thanks for the opportunity to present this submission to you. Please see our submission to the Expert Panel for further details on these topics.

Kind regards

Dianne van Eck

Dianne van Eck
President
Community Alliance SA

From: DTI:Plan SA
To: DTI:PlanSA Submissions
Subject: FW: CHIA SA submission on Greater Adelaide Regional Plan Discussion Paper
Date: Wednesday, 8 November 2023 2:34:52 PM
Attachments: image001.png
image002.png
image003.png
image004.jpg
231108 CHIA SA submission GARP.pdf

OFFICIAL

Hi Team,

Just forwarding the below GARP discussion paper submission

Email was sent to our PlanSA inbox

Thanks

Reference Number: 77171

Kind Regards,
Vu | Customer Support Officer
Planning & Land Use Services | Department for Trade and Investment
E PlanSA@sa.gov.au |W plan.sa.gov.au



From: [redacted]
Sent: Wednesday, November 8, 2023 12:22 PM
To: DTI:Plan SA <PlanSA@sa.gov.au>
Subject: CHIA SA submission on Greater Adelaide Regional Plan Discussion Paper

> You don't often get email from [redacted]. Learn why this is important

Good afternoon,

Please see attached CHIA SA's submission in response to the Greater Adelaide Regional Plan Discussion Paper. Apologies for being a couple of days past the closing date, we have had some staff absences in the past fortnight. I hope the submission will still be accepted.

Regards,

LUKE WESTENBERG
Chief Executive Officer

262 Pirie Street,

Adelaide SA 5000
[redacted] | www.chiasa.org.au | [redacted]

Community Housing
INDUSTRY ASSOCIATION SA

Greater Adelaide Regional Plan CHIA SA Submission

November 2023

Introduction

The Community Housing Industry Association of SA (CHIA SA) is the peak body representing community housing providers in South Australia.

Our members

Our members provide housing services to over 25,000 South Australians. Community housing providers offer a range of housing services, including:

- Specialised accommodation for people with disability
- Affordable housing (with rent capped at 75% of market rates, supporting people on lower incomes)
- Social housing (for people who cannot access housing through affordable housing or private rental, owing to particular housing needs)

Community housing providers are not-for-profit organisations who operate properties owned outright and leased from the SA Housing Trust, in pursuit of their organisational mission.
While community housing providers form part of the social and affordable housing system in Australia (making up more than 25% of properties in the system), it is important to appreciate that they are not public housing; as stand-alone non-government organisations, community housing providers can offer a range of differing housing offerings within the multi-provider system operating in South Australia. This diversity of offerings increases choice for tenants in the system, while diversifying funding options away from sole reliance on South Australian Government capital provision.

CHIA SA

As the community housing peak body in South Australia, CHIA SA contributes to policy development, coordinates information and responses to sector-wide issues, and advocates for a high-quality social and affordable housing system in SA that capitalises on the benefits of a multi-provider approach.

Community Housing
INDUSTRY ASSOCIATION SA

Introduction

This submission reflects consultation with CHIA SA members regarding the Greater Adelaide Regional Plan.

Overall, CHIA SA members welcome the development of the Greater Adelaide Regional Plan, and the opportunity it presents for a structured process to consider future development of the Greater Adelaide region.

This submission reflects some key points that have informed the responses:

- Urban planning should support social inclusion and equitable access to housing and employment opportunities
- This should include explicit acknowledgement of inclusion for cohorts with particular needs, such as people with disability
- Efficient urban planning considers social and affordable housing from an infrastructure perspective – i.e., there are social benefits to social and affordable housing beyond the direct benefit to people housed
- An effective long-term Plan will consider broad social and economic changes (demographics, skills, immigration, employment)

CHIA SA and our members look forward to continuing to engage with the development of the Greater Adelaide Regional Plan.

Community Housing INDUSTRY ASSOCIATION SA

Part One: How should Greater Adelaide grow?

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

- In relation to Outcome 4 – housing that is available in the right places may not always be suitable for individuals; location by itself is not a sufficient criterion to ensure appropriate housing. It is important that Outcome Four should also reflect that housing needs to be accessible, thereby including options for people with disability who currently may not enjoy sufficient choice of suitable housing.

What *other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?*

- The major trends and drivers of change should also address broader population and demographic changes, and associated impacts on land use. The needs of an ageing population, for example, will present significant change and challenges (e.g. access to services) beyond liveability and changing mobility systems.
- Liveability is a broad term. Land use plans should address liveability by framing specific priorities and challenges for each priority cohort or social issue targeted. For example, addressing needs for ageing in place or youth housing having unique requirements to develop required infrastructure and support services. Land use plans need to adopt a geographical lens on social issues to ensure approaches are fit for purpose and address the specific demands of the communities each plan intends to service.
- Workforce and skills cannot be addressed without adequate and accessible training in order to deliver jobs in close proximity to the communities where employment is needed. This will also require that work from home trends are observed closely.
- Land use planning needs to be sufficiently broad to address all elements of what is required to support population growth e.g., access to health services and schools. Further clarification and specificity on how approaches to ensuring all infrastructure supports can be coordinated in a cost-effective manner and delivered at the right time and scale would be beneficial. In this respect, clarification on how the GARP will be coordinated with the development and implementation of Infrastructure SA's next 20 Year Infrastructure Strategy is also sought.

What else *could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?*

- Our members suggested that further specificity about the scope and objectives of this outcome would support input. The ideas for the GARP listed on pages 54-56 could include more actions and targets or indicators of greater direct relevance to the outcome. For example, the existence or scope of widespread native revegetation, biodiversity protection or fire risk mitigation approaches are not clear. It would also be helpful to see more examples of what is considered to be best practice development and ongoing management approaches for parks integrated with other land uses; for both greenfield sites and existing high density areas.
- Land use plans should consider how dwellings and walking routes can be located so that existing green spaces such as the parklands can be accessed and used better. Spaces inside

the CBD and outer ring could be sustainably activated and maintained to better appeal to the demands, needs and interests of the population.

What else could *the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?*

- A socially cohesive region is an inclusive region. The role of infrastructure and housing that supports social inclusion and the needs of people with disability needs to be explicitly identified, whether under this outcome or a separate additional outcome. To this end, there is significant scope for the GARP to address the needs of people with disability and other special needs throughout.
- If this outcome is to be supported by the development and implementation of the GARP, targeted and comprehensive consultation with key stakeholders and bodies with appropriate expertise needs to take place.
- The role of social housing as essential social infrastructure has not been adequately recognised in the GARP Discussion Paper.
- The ideas for the GARP posed under priorities and directions for this outcome should ideally include direct initiatives to address social inequality or the specific needs of marginalised groups.

What else *could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?*

- The identification and protection of industrial and employment land alone cannot support a strong economy without the coordination of adequate and well-located education and skills development opportunities. It is not clear how the ideas for the GARP related to this outcome address the interrelated needs within growth areas of access to employment land, skills and training, and suitable housing.

What else *could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?*

- A greater choice across housing types and locations cannot only be a choice for some. As previously mentioned, housing choices need to include adequate supply of appropriate housing that is suitable for a wide range of needs, including the needs of people with disability. While not all initiatives required to address this will fall under the remit of the GARP, in our view it remains important to acknowledge.
- We acknowledge the Commission's reference to extensive housing studies across Australia to identify demand and supply trend. Specific research and transparent modelling for South Australia should take place over the course of the implementation of the GARP, to establish the range and scope of unmet needs by region and track the spread of populational growth. We believe it is important to establish and maintain evidence-based targets to facilitate housing supply that adequately delivers choice in location, dwelling type and style, local amenities and services, and proximity to employment.
- Ideas for the GARP under the Adaptive reuse State Planning Policy would foreseeably support an increase in housing stock and deliver greater choice of housing types and locations.
- Greater transparency on the nature of 'performance targets for housing diversity within master planned communities' is necessary i.e., will this potentially include expansion of current requirements for mandatory inclusion of affordable housing within new significant development; either in terms of proportion, or to also require a proportion of social housing? If 'housing diversity' otherwise only captures dwelling characteristics but not affordability and

follow on effects on availability and accessibility, this framing neglects the role of social housing as essential social infrastructure. The availability of choice requires that social and affordable housing is available in all regions and the CBD to facilitate access to employment while preventing excess car use.

What neighbourhood *features enhance living and working locally?*

- We believe that approaches and neighbourhood features to achieve the principles of living locally should be guided by clear and measurable targets for outcomes and impacts. Translating this aspirational principle into more concrete actions will foreseeably support the economic feasibility of the outcomes sought, and stronger connections between other elements of the plan which support economic growth.
- Living locally needs to be viewed in the context of housing availability and affordability, and an understanding of social housing as essential infrastructure. Income and employment type should not determine whether households can access housing in neighbourhoods with good access to transport, employment, and amenities. Principles of living locally must inform both master planned greenfield development and approaches to infill; with an appropriate proportion of housing for low to moderate income households throughout all development areas.
- Whether through connection to existing public transport routes and infrastructure or newly developed options, reliable and effective public transport options are an essential feature of outer ring and greenfield developments that can support living locally and reduction in car use. Higher speed connections to the CBD and other employment hubs should be a priority to support the longer distance travel required to create accessible greenfield communities. This should also be coordinated and approached holistically to deliver trade-off wellbeing benefits to communities; such as substituting land use for car parking spaces with green spaces, leisure facilities or other amenities.

Part Two: Where should Greater Adelaide grow?

Comments *on the high growth scenario and development target*

- The alignment between the target ratio of 85:15 infill to greenfield development and the projections provided (on land already zoned for residential development, land already identified for future residential rezonings, land required for the remaining 100,000 homes required to reach the high growth scenario) could be further clarified. The composition of land zoned and identified for future rezonings by proportion of infill sites vs greenfield development should be made transparent.
- The implementation of the target ratio of 85:15 infill to greenfield development will present a significant change to the density and character of existing neighbourhoods. Many Australians enjoy living in low density neighbourhoods with a high proportion of detached dwellings, and common responses to higher density developments the effect of 'not in my backyard' are likely to present an impediment to cohesive neighbourhoods as growth progresses. Transparency of strategies on how this approach will be communicated to communities and stakeholders and carried out in anticipation of potential opposition from residents or local governments would be beneficial.
- Greater transparency on strategies to support growth in the construction industry to safeguard the capacity to deliver the outcomes required under the high growth scenario would also be beneficial.

What is the ideal urban *form to support the growth of satellite cities like Murray Bridge and Victor Harbor?*

- We are concerned that the capacity of areas such as Murray Bridge and Victor Harbour to grow as satellite cities connected to the Adelaide metropolitan region is limited due to restricted transport options and other services and amenities. Urban form that supports this growth should encompass living locally such as through adequate growth of nearby employment opportunities; but also needs to support better transport routes to access the CBD.

What do you see as the benefits and potential drawbacks of greenfield development?

- In previous years, greenfield developments offered households the choice to rent or purchase a larger allotment at a more affordable price. More recent greenfield developments appear to have adopted smaller allotment sizes; which clearly work for some households where quality of life is supported by local amenities, but will not be a viable choice for other households. While dense developments with small allotments supports the economic viability of developments and increases property affordability, the development of minimum sizing requirements or guidelines would promote both liveability and accessibility. A balanced approach that considers demand for property sizes and types, and aims to maximise housing outcomes deliverable to the greatest extent possible; while also addressing concerns around accessibility to reach a mutually beneficial guideline would be a welcome addition to the GARP.
- In relation to greenfield development, we reiterate our concerns regarding the unaddressed need for fast and reliable transport. A failure to provide adequate public transport options as an essential condition to the establishment of greenfield development will lead to

communities that are too inaccessible from the CBD and employment options, and will drive a continued overreliance on car use.

- In this context, we also reiterate our concerns regarding the lack of transparent relationship between the GARP and the Infrastructure SA 20-Year State Infrastructure Strategy. We believe that appropriate infrastructure is crucial to liveable greenfield developments, and the development of accessible services and amenities takes significant time. Sufficient needs projections and planning for services in the right places needs to come first, not as a reactive response.

Where is the next generation *of strategic infill sites?*

- The identification of potential strategic infill sites is challenging for stakeholders at this stage without knowing what sites the SA Government would consider acquiring, and any barriers that may exist due to landholder intentions, for example.
- As with all development types, strategic infill should be close to transport, infrastructure and employment sites. We expect that these are existing baseline considerations and that future planning is already taking place.
- The identification of proposed sites by stakeholders would be supported by clear expectations of the role of agencies such as Renewal SA in terms of de-risking development sites e.g. remediation of industrial contamination. Due to the timeframe associated with these processes, land acquisition and infrastructure planning, we believe that site identification and planning should be commenced several years in advance.

How can infill development *achieve an urban form that is consistent with the principles of Living Locally?*

- Among other strategies, we would welcome initiatives that deliver the right settings to make adaptive reuse an economically viable solution. Transforming existing underutilised spaces within established communities is a promising pathway to supporting the development of an urban form that aligns with the principles of living locally.

What are the most important factors for the Commission to consider in meeting future demand for employment *land?*

- A key consideration should be that employment land is extremely broad and encompasses very different land uses. The need for flexible spaces that can be adapted over time to accommodate different uses should be considered.

DTI:PlanSA Submissions

From: Craig Wilkins [redacted]
Sent: Monday, 6 November 2023 3:10 PM
To: DTI:PlanSA Submissions
Subject: Conservation SA Response to Greater Adelaide Regional Plan – Discussion Paper
Attachments: Conservation Council SA_Submission_GARP Discussion Paper_Nov2023.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

> You don't often get email from [redacted] Learn why this is important

Please find attached.

Cheers
Craig

Craig Wilkins
Chief Executive
He/Him
[redacted]



Ngadlu Kaurna miyurna tampinthi. Parna yarta mathanya puki-unangku.
Conservation SA acknowledges that our offices and The Joinery sit on Kaurna Country.
We offer our respect to the Traditional Owners whose lands and waters we engage with across South Australia.

Disclaimer: The information in this email is CONFIDENTIAL and may be legally privileged. It is intended for the recipient only.
This email may contain information that represents the views and opinions of the author and so do not necessarily reflect those of the Conservation Council of South Australia as an organisation.

Response to Greater Adelaide Regional Plan – Discussion Paper

6 November 2023

Sent via: plansasubmissions@sa.gov.au

The Conservation Council SA welcomes the opportunity to provide a submission in response to the *Greater Adelaide Regional Plan – Discussion Paper*

The Conservation Council SA is an independent, non-profit, and strictly non-party political organisation representing approximately 60 of South Australia's environment and conservation organisations and their 90,000 members.

1. Four Outcomes

Conservation Council of SA commends the approach taken by the SPC to focus on the following four outcomes:

- A greener, wilder and climate resilient environment
- A more equitable and socially cohesive GAR
- A strong economy built on a smarter, greener and regenerative future
- A greater choice of housing in the right places

While there is a welcome presence of climate throughout the Discussion Paper, it is regarded as one factor among many, rather than the predominant shaper of development choices and outcomes for the next 30 years.

Equally, CCSA is concerned that there is an inadequate focus on the role of transport, public transport and freight to shape our city.

Recommendation:

1) *the four outcomes need to prioritise the fundamental role of climate change and transport choices in shaping Adelaide's urban form.*

2. Climate Change as Primary Driver

While it is welcome the Discussion Paper acknowledges a need for greater focus on climate change mitigation and resilience, the vision and outcomes outlined in the Paper betray a Business As Usual (BAU) approach, rather than acknowledging the radical and fundamental reshaping that will occur as climate change deepens.

Climate change is not just one factor of many, it will be the single biggest driver of Adelaide's urban form over the coming decades. Decisions about where people live, where their food and water comes from, and what energy and transport they use will depend on how quickly the climate changes.

Climate induced emergencies, such as flooding (eg Gawler River plain) and fires (Adelaide Hills), will make many parts of the Greater Adelaide region unsafe to live for significant periods. Sea level rise will cause inundation in the Port Adelaide and St Kilda region and, along with increased storm events and energetic water movement, strip the Adelaide coast of sand dunes and beach cover.

Extreme heat events are forecast to occur more frequently and at higher temperatures.

All these disaster events will drive people movement to cooler and safer areas and will require major changes to infrastructure to ensure safety and reliability.

We need a mature conversation about managed retreat away from places at most risk, and we need to start planning for major people movement to safer areas. This Discussion Paper has a responsibility to outline potential scenarios and forecast what a long term managed retreat program would/could look like.

Equally, it needs to prioritise design and planning choices that will keep citizens safer and cooler. In particular, the critical role of urban greening needs to be emphasised far more strongly. Urban tree canopy and extensive ground, wall and roof greening are arguably the most important infrastructure for our cities for cooling our streets and suburbs.

While planting and creating new greening is important, retaining our exiting mature trees is even more so. When we fail to value existing canopy and vegetation, we actually make Adelaide, the hottest mainland capital, less liveable. Evidence shows that Australia is heating up 35% more quickly than the global average[1]. Not only does liveability decrease as temperatures rise, but retention of existing trees and establishment of new trees become increasingly difficult. We can no longer rely on being able to plant in winter and see them survive a summer; there's also no guarantee that they will thrive and produce canopy.

[1] https://www.afr.com/policy/energy-and-climate/australian-warming-outpacing-global-average-by-35pc-iea-20220610-p5aswf#:~:text=Australia's%20temperatures%20are%20rising%20more,of%20fallout%20on%20energy%20systems.

And as a community we need to develop a better understanding that appropriate mitigation of bushfire risk in peri-urban areas is not the removal of established trees[2].

As well as mitigation, the design of our cities is instrumental in reducing greenhouse gas emissions.

Recommended actions with multiple benefits in addition to those associated directly with decarbonisation, include (it should be noted that these recommendations are not all-encompassing):

1. Ban and phase out of reticulated methane gas services, particularly in greenfield developments.
2. Regionally, all neighbourhoods in major settlements are connected by high-quality public transport and active transport to reduce car dominance and enhance sustainable mobility.
3. All neighbourhoods incorporate local open space, shopping and other facilities within walking distance, with walking spaces enhanced by greening.
4. All retail/activity centres established with electric vehicle charging stations. This is also supportive of the objectives of integrated, multi-function centres and compact form.
5. Integrate battery energy storage systems to best effect within the region - Victoria has recently changed planning provisions to accommodate community batteries.

Recommendations:

2) *The GARP should describe a much greater role for climate mitigation, adaptation and building resilience to climate impacts for shaping development choices.*
3) *The GARP should clearly articulate scenarios outlining current and future climate hazard risk and outline options for managed retreat through planning or infrastructure choices, and indicate areas where future development needs to be restricted.*

3. The Critical Role of Transport

The availability of private transport and the routes taken for freight movement are significant drivers for urban development and factors in people's capacity – indeed willingness - to embrace active transport. Whilst living locally is of critical importance, areas mooted for new growth are not well served by public transport and if this critical infrastructure is not in place when people start to move in, they will simply continue to prefer the car as their primary mode of transport. Cycling or walking to one's destination should not require acts of bravery. A key selling point of any greenfield development should be the ability to live without a car.

Increased use of public transport – with dedicated lanes so that this flows better than private cars – as well as location of well-designed active transport corridors separated from main

[2] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://safecom-files-v8.s3.amazonaws.com/current/docs/Mature%20tree%20position%20statement.pdf

roads (eg: one street over), with well provisioned secure storage to enable parking of bikes at train stations and bus interchanges will be an essential part of enabling people to live locally.

There is no mention of freight and freight routes and the linkages between these and housing provision in the Discussion Paper. Whilst we understand that these are an Infrastructure SA responsibility, it is essential that development of housing, employment and freight work closely together. There are great opportunities for the Greater Adelaide Freight Route to emerge north of the city, close to rail yards for modal shifts so we must ensure that future projects such as this are also borne in mind. Smart design to get as much heavy freight as possible out of our suburbs means people are better able to use active transport, a key plank of our decarbonisation strategy. Reliance on the private car entrenches disadvantage.

Additionally, the use of land further from the centre of Adelaide for continued housing provision ensures that density never reaches the critical mass required for the infrastructure and services that make it possible to live locally and to do so without reliance on a private car.

As much as possible, the provision of transport infrastructure must come before housing and development, as retrofitting transport afterwards is far more costly, and much more difficult.

And whilst we support the build-up of housing and other development along established transport corridors, depending on the transport choice, the health impacts of this are concerning, with evidence showing a correlation between living on or in the vicinity of major road transport corridors and:

- Middle age onset of asthma
- Increased risk of heart attack
- As many as 11% of dementia cases in those who live along these corridors
- Increased instances of childhood asthma

Under-investment in public and active transport is undermining Adelaide's liveability and sustainability. It is untenable therefore to accept a Regional Plan that directs urban growth without a corresponding and well-integrated commitment to and planning for multi-modal transport.

Recommendations:

4) *The Regional Plan must address not just where and how Adelaide grows, but how we get around and deliver goods sustainably, as an integrated land use and transport plan. Sustainable mobility through integrated (multi-modal) transport and land use planning must be a central pillar of urban planning (as tended to be the case in earlier metropolitan plans).*
5) *Walkable communities (Page 54) - it would be invaluable to give community members an example of where this already occurs and is working well. We commend the use of annual benchmarking and reporting.*

4. Growth Scenario Confusion

It is surprising and disappointing that two SA Government led consultation processes (the 30 year Greater Adelaide Regional Plan via the State Planning Commission and the 20 year State Infrastructure Strategy via Infrastructure SA, conducted during the exact same time period, and both forecasting state priorities over the coming decades, have two such different population growth scenarios.

Expectations of population growth are major drivers of land release choice – both location and size and infrastructure choices.

We are concerned that the scenario being considered in the GARP is for high growth, despite this scenario being used in previous 30 Year Plans, with the *actual* population growth falling significantly short.

The consequence of this high growth strategy is that far more land further out from the city core is released for housing and development than is actually required. Developers skip over development opportunities in infill and outer suburbs to embrace the cheaper land now prematurely released on the urban fringe leaving holes throughout the urban form that would have normally been developed first under a lower population growth target. This artificially stretches out the urban form and exacerbates the challenge of providing public transport and other critical infrastructure.

Poorly planned population growth, and economic development models that rely on population growth to stimulate demand, negatively influence urban form and risk the carrying capacity of the natural environment.

Recommendation:

6) *The GARP adopt as a maximum the same, lower population growth target used by Infrastructure SA to guide their scenario planning in the 20 year Infrastructure Strategy.*

5. The Importance of Biodiversity

There is a wealth of evidence that the presence of biodiversity is critical to human health and that the benefits increase with the richness of the biodiversity. This is most easily achieved in the urban environment with retention of existing canopy and additions of a range of species, including trees, shrubs and groundcovers, along with natural urban waterways. The UK mandates for bio-diversity positive development[3] whilst the Australian Institute of Landscape Architects (AILA) has produced a position statement on Biodiversity Positive Design.[4] In it, they make the point that, at a national level, half of our endangered species are within areas slated for housing development. This represents a significant threat to our

[3] https://www.gov.uk/government/news/new-developments-to-deliver-for-people-and-nature).
[4] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.aila.org.au/common/Uploaded%20files/_AILA/Resource%20library/AILA%20Biodiversity%20Positive%20Position%20Statement.pdf

environmental health. Biodiversity Positive design recognises that it is not enough simply to green our cities – we must actively design for increased biodiversity.

Recommendation:

7) *The GARP adopt a clear mandate for biodiversity positive development throughout the Adelaide region.*

6. Infill, Affordability & Liveability

The ability to ensure adequate, affordable and liveable infill housing in Adelaide's already vast and sprawling urban form is a primary challenge for the Regional Plan.

Poorly designed infill provokes community anger and dissuades people from embracing this option. Mandating higher quality and more energy, water and transport efficient development is therefore essential to changing community and political appetite.

Equally important is the focus on creating green and beautiful urban spaces that attract people through better quality of life.

We commend the prioritisation of constrained areas for housing and encourage the government take on the challenge of providing additional housing only within the existing city footprint. This would require creative thinking on the part of government and by the community about the places we want to live, but it does offer exciting opportunities.

We also need to provide much greater diversity of housing stock. As the highly regarded architect Naomi Stead has written:

In the past developers have often been distrustful of architects – the people they have tended to trust are real estate agents. This has led the whole development pipeline to be predicated on what has sold before, in a malign chicken-and-egg logic whereby different housing offerings haven't been tried, so there's no evidence they will sell, so they won't be tried because there's no evidence they will sell. Lenders, too, are wary of loaning money on an untested design idea. The system has been bogged in inertia, braced against innovation. If you always do what you always did then you'll always get what you always got, and what we got in the past was often strikingly bad[5]*.*

Homes (and the land they sit on across greater Adelaide) are one of our most valuable resources. There is a need to contain the footprint of the GARP, with the aim of maximising both the retention of productive farming land *and* conservation areas. We believe that the plan should address:

- Better use of existing building stock. Where multi-storey buildings in the CBD and on the city fringe could be repurposed for housing (and meet the requirements of the Code), they should be. This values the land on which they sit, provides skills-based

[5] https://www.thesaturdaypaper.com.au/culture/architecture/2023/09/02/nightingale-village?utm_medium=email&utm_campaign=The#hrd

work opportunities and also values the embedded carbon in the materials used in their construction. Vibrant communities are resilient communities and a mixture of land uses across areas is an essential component of this.

- Private/public partnerships could see better use made of land currently used for parking at major commercial centres. To use this valuable, well-located land for car parking for only a part of the day is to significantly undervalue it. Housing located in areas such as this has fantastic access to a huge range of the services that we need to live locally. These areas all also generally well served by public transport.
- Air BnB stock. This is problematic, as people are using investment properties which sit empty for good portions of the year and could be better used as housing all year 'round. We recognise the need for government intervention at both the State and Federal level to help solve this problem; we recommend that the SPC considers highlighting this to government.

Recommendation:

8) *The GARP prioritise affordable, attractive and well designed housing infill development integrated with public and active transport over further greenfield development.*

Thank you again for the opportunity to provide a submission to the *Greater Adelaide Regional Plan – Discussion Paper*. The Conservation Council SA welcomes the opportunity for ongoing engagement in the development of this Plan.

If you require further information, please contact the office at 08 8223 5155, or contact me at [redacted]

Yours sincerely,

[redacted]

Craig Wilkins
Chief Executive

DTI:PlanSA Submissions

From: Jodi Slater [redacted]
Sent: Monday, 6 November 2023 1:43 PM
To: DTI:PlanSA Submissions
Cc: Miranda Starke
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: COTA SA Submission_GARP_final.pdf

You don't often get email from [redacted] Learn why this is important

Good afternoon,

Please find attached COTA SA's submission to the Greater Adelaide Regional Plan Discussion Paper.

With thanks

Jodi Slater
Policy Manager

Available Tuesday-Friday

COTA SA
Postal: PO Box 7024, Hutt Street, Adelaide, SA 5000
Street: Kaurna Country, Level 1/85 Hutt St, Adelaide
[redacted]
www.cotasa.org.au

Proudly achieved Certificate level in the Australian Service Excellence Standards (ASES).

COTA SA acknowledges the Kaurna people of the Adelaide Plains as the traditional custodians of the land our headquarters occupy. We also acknowledge all Aboriginal nations throughout South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to Elders past, present and emerging and extend that respect to all Aboriginal people.

COTA SOUTH AUSTRALIA
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SUBMISSION TO THE

Greater Adelaide Regional Plan Discussion Paper

6 November 2023

Submission authorised by

Miranda Starke
Chief Executive

Prepared by:

Jodi Slater
Policy Manger

COTA SA
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www.cotasa.org.au

COTA SA welcomes the opportunity to provide a submission to the *Greater Adelaide Regional Plan (GARP) discussion paper*.

COTA SA is an older people's movement run by, for and with older people. We represent the rights, interests and futures of around 700,000 (39%) older South Australians. We engage widely with older South Australians across the state and the lived experiences of the diverse community of older South Australians shape and inform COTA SA's policy and advocacy work, including through our Policy Council, Regional Advisory Groups, LGBTI+ Rainbow Hub and Climate Change Group.

COTA SA cares deeply about ageing well and is committed to ensuring older South Australians have the opportunity, capacity and ability to navigate the changes of ageing in their place of choice. The *Greater Adelaide Regional Plan* is an opportunity to deliberately plan to support South Australians to age well, now and into the future.

Planning for Ageing Well

In the many models of ageing well, the most common elements that support and empower navigating change are **health** (including physical and mental wellbeing), **security** (including housing and financial security), **purpose** (including volunteering, working and self-actualisation) and **connection** (including having a sense of belonging and social connection). With many of these elements considered in the *Greater Adelaide Regional Plan* (GARP), in particular the Living Local principles, this is a timely and impactful opportunity for ageing well to be factored into urban planning across South Australia. As the oldest state by demographic on mainland Australia South Australia is uniquely placed to lead the way.

Our planning system must design and build an ecosystem that supports an ageing population and supports older people to age well in their place of choice. Such an ecosystem includes public and community transport and active travel, housing (affordable, adaptable, close to amenities), digital accessibility, climate adaptation, green spaces, accessible and safe communities that allow older people to stay active, cool and warm refuges to cope with extreme weather events, health and aged care services and community connection.

COTA SA strongly advocates for a planning system that lays the foundations for communities that are age-friendly, cohesive, inclusive, resilient, adaptable and accessible. Strategic design and planning that allows people to age in their home and in their community, leads to positive health and wellbeing, and minimises cost and disruption to the individual, their community and ultimately, the public health system.

Specifically, we call on the government to:

- Consider our ageing population and the rise in isolation and loneliness as major trends that shape the future of planning and development in South Australia.
- Plan for diverse housing options that meet the diverse needs of the older population, now and into the future, whilst not precluding an older person from being able to choose where or the type of dwelling they live in.
- Build climate-safe, thermally efficient homes in new housing developments and significantly tighten building standards to insulate and seal homes and reduce energy demand.
- Incorporate social housing into every government-led and Renewal SA residential development.
- Plan for infill and medium-density communities that facilitate community connection and accessibility, and maintains or increases tree canopy.

COTA SA has a track record of success connecting with and delivering programs with and for older South Australians. We can bring value as a for-purpose partner to achieve the best outcomes for older people, and can play an active role to ensure our planning system meets

ageing well outcomes. We welcome the opportunity to collaborate with the government to shape the planning system.

Issues

An ageing population and increasing isolation and loneliness are major social trends

Our population is ageing. It is projected that by 2066, our older population will increase from 16% to 23%[1]. Our systems must continually evolve to meet the needs of a growing population of older people. Urban planning supports the evolution of these systems to ensure communities are physically designed to allow and optimise access to social supports, services, spaces and opportunities that enable people to age well and age in their communities. Our ageing population should be a major trend and driver that will shape the future of planning in South Australia.

Another major trend is the increasing rate of isolation and loneliness. This affects population groups of all ages and older Australians present a high risk group for social isolation due to a number of life stage factors which are associated with ageing: living alone, no longer having a partner/spouse, chronic illness, mobility issues, loss of friends and family, physical isolation, transport challenges and digital illiteracy. Results of the 2021 HILDA survey[2] showed that just under 1 in 5 women and just over 1 in 6 men aged 55+ 'often felt very lonely'. Loneliness can increase the risk of severe health conditions, including stroke and heart disease, and can increase the chance of early death by 26%. This places significant strain on our public health system and our care systems.

Ensuring that older South Australians can continue to have strong community connections is vital to combating isolation and loneliness. From a planning perspective, this means ensuring that older people have accessible options for living and moving about their local areas so that they can remain active community members for as long as possible.

Building age-friendly communities

COTA SA supports the concept of Living Locally (p84) and acknowledges its great benefits to community building and climate change adaptation. It is important that we plan to build communities that are age-friendly, cohesive, inclusive, resilient, and accessible. Particularly important to ageing well are the following Living Locally principles:

Housing choices at all stages of life

Strategic design and planning that allows people to age in their home and in their community leads to positive health and wellbeing, and minimises cost and disruption to the individual, their

[1] Older Australians, Demographic profile - Australian Institute of Health and Welfare (aihw.gov.au)
[2] https://www.aihw.gov.au/reports/australias-welfare/australias-welfare-2023-data-insights/contents/social-isolation-loneliness-and-wellbeing

community and ultimately, the public health system. Secure housing is fundamental to the health and wellbeing of older South Australians, which is why home and community is one of three strategic priorities in South Australia's Plan for Ageing Well 2020-20253- a plan which should not sit in isolation to other state government plans.

A variety of factors mean that secure housing is rapidly moving out of reach for an increasing number them. Older women are particularly at risk because of a lifetime of lower wages, lower superannuation, and asset losses in separations. Older LGBTI+ people advise that access to housing as they age puts them at particular risk of homelessness.

Insecure housing is compounded by ageism, long periods of underemployment prior to age pension eligibility and poor health. Indeed, a recent study found evidence to suggest that, "challenging housing circumstances negatively affect health through faster biological ageing[4]." The study further found that the reversible nature of biological ageing means that there is significant potential for housing policy to improve health outcomes.

The majority of older people want to age in place and stay in their own homes as they age. Enabling this includes housing that is affordable, adaptable, accessible and close to amenities. It is important this does not preclude older people making the choice of the type of housing they can live in. Like older people themselves who are diverse in their lifestyle preferences, incomes, identity, cultural background and relationships, there is not one-size-fits-all model when it comes to our housing needs as we age. Older people want to access a diverse range of housing options including private rental, owner-occupied properties, retirement village living, residential parks, lifestyle villages, social housing and residential aged care. It is crucial that older people can choose the type of housing that is right for their needs. This includes not placing an expectation on older people that they down-size at a particular point in their lives. Our planning system must enable a variety of housing options suitable for all ages and abilities.

This principle could also include housing design to ensure future housing meets livability standards; particularly relating to age-related mobility and accessibility requirements, and also including energy efficiency standards. The National Construction Code is a key mechanism to ensure these standards are being met at a minimum, and new regions are planned in a way that will at least meet if not far exceed these standards.

Public transport options

Access to adequate public and community transport in both the metropolitan area and in regional South Australia is fundamental to ageing well. It enables older people to be active in

[3] South+Australia's+Plan+for+Ageing+Well+2020-2025_WEB.pdf (sahealth.sa.gov.au)

[4] Are housing circumstances associated with faster epigenetic ageing? | Journal of Epidemiology & Community Health (bmj.com)

their communities and to maintain purposeful and independent lives that are connected to family, friends, employment, services and interests.

Quality, accessible and reliable public transport is more likely to be valued by older people who do not drive due to age-related changes, or who are on low and fixed incomes and unable to afford private transport. Making public transport free for Seniors Card holders in 2022 resulted in a 40% increase in usage over the following year, showing that increasing access to public transport results in more older South Australians able to participate in volunteering roles, to commute to their place of employment, to undertake caring roles and to partake in social, economic and recreational activities. These connections are fundamental to ageing well and planning for public transport infrastructure is important.

Equally important is planning for active travel. For example, incorporating bike paths and storage, footpaths and walking paths into the design of neighbourhoods that enables people to be physically active, safely.

Open space and recreation

Planning for open and green spaces that enables active travel, recreational activities, social connection and connection to our natural environment is important for people's health and wellbeing, and contributes to creating meaningful connections and promoting healthy habits as we grow older.

Everyday shopping and services

Access to services is important for older people, in both ensuring services are available and meet community needs, but also easy to physically get to.

Safer streets and spaces

Feeling safe in your own home and community is important for wellbeing and is especially important to consider how this is enabled through the planning of communities, ensuring protectives services and technology are planned for and built. Safe streets and spaces are particularly important for communities that disproportionately experience discrimination, including LGBTI+ communities and survivors of domestic violence, including a growing cohort of older women living alone.

Building climate resilient homes and communities

Older South Australians have a deep commitment to reduce the severity and impact of climate change for today's community and for future generations. The adverse effect of climate change on the health of the community is evident in the rising cost of energy, heat and cold-related ill health and extreme weather events. The impacts of climate change are disproportionately felt by those on low and fixed incomes and vulnerable community members, including a substantial

proportion of older people who are renters, as they will have the least capacity to mitigate climate change and adapt to extreme weather conditions.

We note the references to climate change throughout the discussion paper and there is a clear statement of intention to position the future planning of the Greater Adelaide region with mitigation and adaptation to climate change in mind. COTA SA's surveys consistently show that the majority of older South Australians have a real desire to contribute to the prevention of, and adaptation to, climate change[5]. We therefore strongly support the intention for future planning of the Greater Adelaide Region to prioritise climate change mitigation and adaptation through achievement of meaningful, relevant targets.

COTA SA believes that the future impact of climate change on South Australia will highlight the importance of community and social cohesion. Provision for community-building activities and projects such as community gardens, cool/warm refuges in days of extreme heat or cold (such as being explored currently by the City of Campbelltown), community batteries for solar electricity, and community virtual power plants we expect will be the sorts of activities that South Australians will search out to help them through the extremes of weather.

Climate-safe, thermally efficient homes must be considered in new housing developments and building standards tightened significantly to insulate and seal homes and reduce energy demand.

The thermal efficiency of existing dwellings must also be improved, particularly in social housing and private rental properties. For example, in jurisdictions such as the United Kingdom, proposals are being put forward to improve the quality of existing houses[6] to make them more comfortable in extreme weather.

Opportunities for master-planned developments that support housing security and climate adaptation

The Discussion Paper is clear that Infill can be done better (on Page 10) and makes the case for a master-planned approach for strategic infill development that can achieve, "higher densities that offer diverse and affordable housing close to businesses and industry."
COTA SA supports infill development and considers it an important consideration in how the greater Adelaide region should accommodate a growing population. Indeed, there is evidence that shows that established areas with medium density housing is linked to higher liveability[7].

[5] Climate Change • COTA SA
[6] https://demos.co.uk/research/home-improvement-a-triple-dividend-part-one-boosting-the-british-economy/

[7] Place Score housing survey: Data shows density key to community vibe | The Advertiser (adelaidenow.com.au)

Our key recommendations for master-planned developments and urban infill include:

- Every government-led / Renewal SA residential development must include a proportion of social housing. There are a number of government-led / Renewal SA residential developments underway currently which do not provide for any social housing. This is a missed opportunity. It is well recognised that the demand for social housing far outweighs the supply. This can be addressed in two ways: grow the public and community housing sector (social housing) and replace or renovate houses that are no longer safe or fit for purpose. SACOSS argues that around 1,000 new social housing dwellings must be built each year to rebuild the stock of social housing. Anything less will merely cover population growth[8]. Planned consideration must be given to increasing affordable and social housing in sufficient numbers to address housing stress and put downward pressure on the private rental market. Social housing cannot be considered in isolation from the broader planning approach and the relevant legislation must be amended to guarantee this.
- Urban Corridor Development (see p137) must include tree canopy provision and climate-resilient homes. There are many examples along corridors such as Anzac Highway (referenced in the GARP Discussion paper) that have little tree canopy or show evidence of climate-safe housing.
- Small-scale infill (see p142) has resulted in almost no tree canopy in the subsequent developments. The Discussion paper acknowledges community concerns about this form of development but offers no solutions.

There are numerous examples of creative approaches to medium-density housing which could be considered. For example:

- the Bowden development provides medium-density accommodation as part of a well-planned development[9].
- Nightingale Housing[10] builds smaller cooperative-style medium-density developments. These are mainly in Victoria but is commencing in South Australia. Its underlying focus is, "building apartments that are socially, financially and environmentally sustainable….homes should be built for people, not profit".

Each of these approaches has governance and financial challenges however, they are valuable in illustrating alternative models of development.

Given that there may be a shortage of parcels of land which can be developed for medium-density housing in some locations, a further suggestion is to explore the possibility of redeveloping suburban and regional shopping centres. Most are either one or two storey

[8] SA's housing needs under spotlight at national cabinet | SACOSS
[9] https://renewalsa.sa.gov.au/projects/bowden/
[10] https://www.nightingalehousing.org/?gclid=EAIaIQobChMIjfWG8oec_wIVVTdyCh2--QRzEAAYASAAEgIv3vD_BwE)

complexes, often with large expanses of asphalt for car parking and frequently located close to bus routes. If the sites are redeveloped fully to a medium density (say, five storeys), the development could include extensive solar cells and green roofs, eliminate the heat effect of the asphalt, address housing shortages and lack of variety in housing options, address transport needs, and incorporate design features which foster community connection.

Increasing tree canopy and green spaces

We note the commentary on tree canopy and green spaces including on Page 45 of the discussion paper[11]. Green spaces are important for ageing well, and many local government areas have developed tree strategies which all refer to their cooling effects and helping communities adapt to climate change.

One of the goals of the planning system is for urban green cover to be increased by 20% in metropolitan Adelaide by 2045 (p164). Our concern is that the Planning and Design Code – an important part of the hierarchy of planning documents in South Australia – is not fit for purpose to achieve the goal of an expansion in tree canopy. This is largely due to the ongoing loss of existing tree canopy, particularly in new developments. For example, in PO 13.2 and DTS/DPF 13.2 under the *Design in Urban Areas* section of the Code, the minimum coverage of tree canopy is only between 2 and 10%, depending on the size of the block, which can result in a substantial **reduction** in tree canopy. For the most part, each development is treated in isolation in the development assessment phase, and as subdivisions take place, most existing trees on private land for which development is planned are lost.

Although the loss of tree canopy is acknowledged in the discussion paper, we are concerned the current planning rules don't do enough to reduce that loss.

For further information and discussion

COTA SA looks forward to participating in the engagement on the draft GARP in 2024. We would be pleased to meet with the Commission to discuss our submission. Please contact Miranda Starke in the first instance.

Acknowledgement of Country

COTA SA acknowledges and respects Aboriginal people as the traditional custodians of the land of South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to First Nations Elders past, present and emerging and extend that respect to all Aboriginal people.

[11] https://livingadelaide.sa.gov.au/__data/assets/pdf_file/0003/278265/Target-5.pdf).

DTI:PlanSA Submissions

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Attachments: Dementia Australia Submission - Greater Adelaide Regional Plan Discussion Paper .pdf

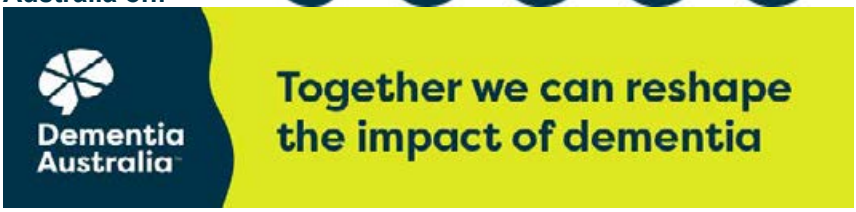
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Good morning
Please find attached a submission from Dementia Australia to the Greater Adelaide Regional Plan Discussion Paper. We would be happy to discuss our submission further with the State Planning Commission.
Kind Regards

Emilie Awbery
Policy Officer
(She/Her)

Dementia Australia
27 Conyngham Street, Glenside SA 5065
[redacted]
dementia.org.au

Follow Dementia Australia on:



For information about dementia, advice or support phone the
National Dementia Helpline 1800 100 500

Dementia Australia (ABN 79 625 582 771) is a registered non-profit charity.

Dementia Australia would like to acknowledge the Aboriginal and Torres Strait Islander people as the traditional custodians and carers of the country of Australia. We acknowledge and respect the Aboriginal and Torres Strait Islander people of Australia's relationship with country and their cultural and spiritual beliefs.

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Greater Adelaide Regional Plan Discussion Paper

Dementia Australia Submission 6 November 2023

Dementia Australia

Dementia Australia is the peak dementia advocacy organisation in Australia.

Our organisation engages with people with dementia, their families and carers in our activities, planning, policy and decision-making, ensuring we capture the diversity of the living experience of dementia across Australia.

Our advocacy amplifies the voices of people living with dementia by sharing their stories and helping inform and inspire others. As the trusted source of information, education and support services, we advocate for positive change for people living with dementia, their families and carers, and support vital research across a range of dementia-related fields.

Dementia in Australia

Dementia is the term used to describe the symptoms of a large group of complex neurocognitive conditions which cause progressive decline in a person's functioning.

Dementia is not just memory loss - symptoms can also include changes in speech, reasoning, visuospatial abilities, emotional responses, social skills and physical functioning. There are many types of dementia, including Alzheimer's disease, vascular dementia, frontotemporal dementia and Lewy body disease.

Dementia is one of the largest health and social challenges facing Australia and the world. In 2023, it is estimated there are more than 400,000 people living with all forms of dementia in Australia. This number will continue to grow to more than 800,000 by 2058.[1]

In February, the Australian Institute of Health and Welfare released data showing dementia is now the leading cause of disease burden among Australians aged 65 and over. Dementia is the second leading cause of death for Australians and the leading cause of death of women.[2]

[1] AIHW (2023) *Dementia in Australia.* **https://www.aihw.gov.au/reports/dementia/dementia-in-aus/contents/summary**
[2] AIHW (2023) *Dementia in Australia, Summary, Impact* **https://www.aihw.gov.au/reports/dementia/dementia-in-aus/contents/summary**

People living with dementia in South Australia

Dementia is a cognitive disability which affects people of all ages, causing difficulties with thinking, memory and behaviour. People with cognitive disability may have challenges with remembering, learning, concentrating, decision-making, attention, communication and problem-solving, among other difficulties.

There are estimated to be more than 33,300 people living with all forms of dementia in South Australia and this is expected to increase to more than 55,000 by 2058.[3]

Dementia does not just affect older people. There are thought to be around 2,000 people living with younger onset dementia in South Australia, which is dementia diagnosed under the age of 65. There are also children living with dementia.

Around 70% of people living with dementia live in the community, rather than in residential facilities[4]. Most people want to remain living in their own homes as they age, and there is a growing trend towards supporting people to age in place, in their communities.

Many people with younger onset dementia live at home with their families. They may be parents, continue to work and to be involved in community activities. Our infrastructure needs to support people with cognitive or neurological disabilities, and older people, to continue to live in their own homes in their communities.

Our changing demographics mean that we need a shift in how we plan for ageing and dementia in the Greater Adelaide Region. We need to enable innovative solutions which embed dementia-friendly built design, community engagement and access to transport and services. We also need to examine new housing models to support people to age in place in their communities, or remain at home if their care needs increase.

Dementia Australia is grateful for the opportunity to respond to the Greater Adelaide Regional Plan Discussion Paper and supports a focus on more equitable and socially cohesive communities.

People living with dementia in outlying areas

Equitable and socially cohesive communities for people living with dementia and their carers means infrastructure and built design which facilitates community engagement, accessible transport, suitable housing, and access to health and wellbeing services.

Dementia Australia's community development teams find that the need for greater investment in infrastructure to achieve health and wellbeing outcomes is particularly acute in regional areas.

Although this Plan focuses on the Greater Adelaide Region, we note that people with dementia living in outlying areas of the Greater Adelaide Region including Murray Bridge, the Fleurieu Peninsula, Northern Plains and Barossa will have higher needs for the development of

[3] Dementia Australia (2023) **Dementia in Australia 2023-2058 – Dementia Prevalence Data Estimates and Projections.**
[4] AIHW (2023) **Dementia in Australia, Prevalence of Dementia.**

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infrastructure to support equitable access to the community and wellbeing outcomes than those in metropolitan areas.

People living in regional areas also have more difficulty remaining in their communities as they age or if they develop increased care needs due to progression of dementia, because there are fewer residential care options available locally.

The Greater Adelaide Regional Plan should consider strategic approaches to housing models to provide a greater range of options to support people to remain at home in their communities, as they age or if their care needs increase. This could include regulations which facilitate 'granny flat' or small house models or other adaptations to existing premises. It could also include purpose-built housing stock in local community areas that can meet the housing needs of people living with dementia and their families.

Approaches to development of outlying areas of the Greater Adelaide Region should also consider planning for expansion of housing supply for the health and care workforce required to deliver services in these areas to support people to age in place.

Dementia-Friendly Communities

Dementia Australia works towards to the creation of dementia-friendly communities. Dementia-friendly communities are places where people living with dementia are supported to live a high quality of life with meaning, purpose and value. They are places where people with dementia are understood, respected and supported, and confident they can contribute to community life.

Dementia progressively impacts on people's cognition, thinking, mobility, emotional and social skills. In a dementia-friendly community people will be aware of and understand dementia, people with dementia will feel included and involved, and they will have choice and control over their day to day lives.[5]

Dementia Australia's research has found that people living with dementia and their carers are significantly more lonely than other members of the general public. People living with dementia want our communities to be more dementia-friendly, and to them to continue to live well and to be involved in the activities they enjoyed before diagnosis.[6]

Dementia-friendly communities aim to improve access to social engagement, health and care services to enable people living with dementia to continue living at home. This includes the physical environment, such as signage, lighting and colours, and access to convenient transport.[7]

There are many features of built design that can make the community more dementia-friendly.[8] These features include:

- Affordable, accessible transport.
- Conveniently located community venues.
- Public areas and parklands being clean, well-kept, and pleasant.

[5] Dementia Australia (2014) **A Guide to Becoming a Dementia-Friendly Community.**
[6] Dementia Australia (2019) **Creating Dementia-Friendly Communities – Community Toolkit.**
[7] Dementia Australia (2019) **Creating Dementia-Friendly Communities – Community Toolkit.**
[8] Dementia Australia (2019) **Creating Dementia-Friendly Communities – Community Toolkit.**

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- Plentiful outdoor seating which is safe and well maintained.
- Undercover areas in parklands to ensure accessibility in all weather conditions.
- Footpaths being wide, level where possible, non-slip, well maintained and free of obstructions.
- Bicycle paths being separate from footpaths and pedestrian walkways.
- Adequate number of pedestrian crossings which are functional for people with different levels and types of disability, with non-slip markings, visual and audio cues and sufficient crossing times.
- Visual landmarks in place to assist with wayfinding, such as garden beds, murals, water fountains and features.
- Adequate and evenly distributed street lighting to assist those with dementia and lower visual acuity.
- Level changes are clearly marked and well lit, with handrails and non-slip, non-glare surfaces.
- Building entrances being clearly visible and obvious.
- Buildings being well-signed outside and inside, with sufficient seating and toilets, accessible elevators, ramps, railings and stairs, and non-slip floors.
- Indoor and outdoor public toilets being well-maintained, clean, accessible and adequate in number with appropriate signage.
- Bus shelters having enclosed and adequate seating.
- Street clutter including excessive signage, music, advertisements and bollards being minimal.
- Background noise being minimal with acoustic barriers such as trees, hedges and fencing in place, and grass rather than hard surfaces.
- Signs having large graphics and symbols in clear colour contrast to the background, preferably dark lettering on a light background.
- Signs having non-glare lighting and non-reflective coverings.
- Quiet space being available for someone who might be anxious or confused.

Thank you for considering our submission to the Greater Adelaide Regional Plan Discussion Paper. We have a dedicated policy and community development staff in South Australia and would be happy to discuss any of these issues with you in more detail. The Dementia Australia Policy team can be contacted on [redacted]

More information about dementia-friendly communities is available at **dementia.org.au** and **dementiafriendly.org.au**.

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Please find attached Engineers Australia's response to the Greater Adelaide Regional Plan Discussion Paper.

Should you have any questions please do not hesitate to contact me.

Regards,

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Engineers Australia Response to the Greater Adelaide Regional Plan Discussion Paper

November 2023

This report has been developed through Engineers Australia's member-delivered policy and advocacy initiative.

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Introduction

Engineers Australia is pleased to provide a submission in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper. We acknowledge the holistic approach that has been taken in the considered development of this document and its open encouragement of broader industry and stakeholder contribution.

This submission has been prepared with two key priorities in mind. The first is to ensure that the GARP is informed of key infrastructure planning principles, needs and objectives for future urban (and regional) development from an engineering perspective. The second is to articulate key learnings from previous greenfield and infill development which will require greater focus, refinement and implementation to ensure the success of future development. Our areas of contribution consider economic, environmental and social perspectives.

The services provided by the engineering profession span the full infrastructure lifecycle, from the earliest stages of planning, through to design, construction, asset management and renewal. This is reflected in our submission. Topics discussed in this submission however require consideration from this early planning stage.

Contact

Engineers Australia is committed to the achievement of successful integrated infrastructure outcomes for the benefit of the whole community. This submission has been developed by a member-led group of members in South Australia. We would be pleased to provide more detailed advice to the commission regarding the enclosed matters and any other relevant areas of interest to ensure successful development and implementation of the GARP.

To discuss this further, please contact Jan Irvine, General Manager, South Australia at [redacted]

About Engineers Australia

Engineers Australia is the peak body for the engineering profession in Australia. With over 120,000 individual members, we represent people from a wide range of disciplines and branches of engineering. Engineers Australia is constituted by Royal Charter to advance the science and practice of engineering for the benefit of the community.

This paper is guided by our Royal Charter and Code of Ethics, which state that engineers act in the interests of the community, ahead of sectional or personal interests, working towards a sustainable future.

1. Economic Principles

1.1. Urban Form

1.1.1. Infrastructure and costs

Choices made over the location and form of urban development has large impacts on the quantity and form of supporting infrastructure that it may necessitate. The cost impacts of these differences may be large.

Overall, studies have shown that the lowest infrastructure costs are usually accrued for infill development, not urban fringe or remote (SGS, 2016). Therefore, regardless of debates over developer contributions and who pays, there should be a strong focus in the plan on making urban infill development more feasible.

Good planning and management practices can reduce development and infrastructure costs. The use of features like common (shared) service trenches, small(er) lot subdivision, narrower paved road widths for local access, and mixed land uses in subdivision are common in many OECD countries with high standards of urban amenity and housing affordability that may be superior to Australian levels.

Recommendation:

The feasibility of urban infill development should be evidenced by streamlined planning and subdivision processes, changes to zoning, and adopting in principle rules relating to rezoning near existing employment, services and public transport. Desirably urban infill should form the majority (60%+) of urban residential development location options.

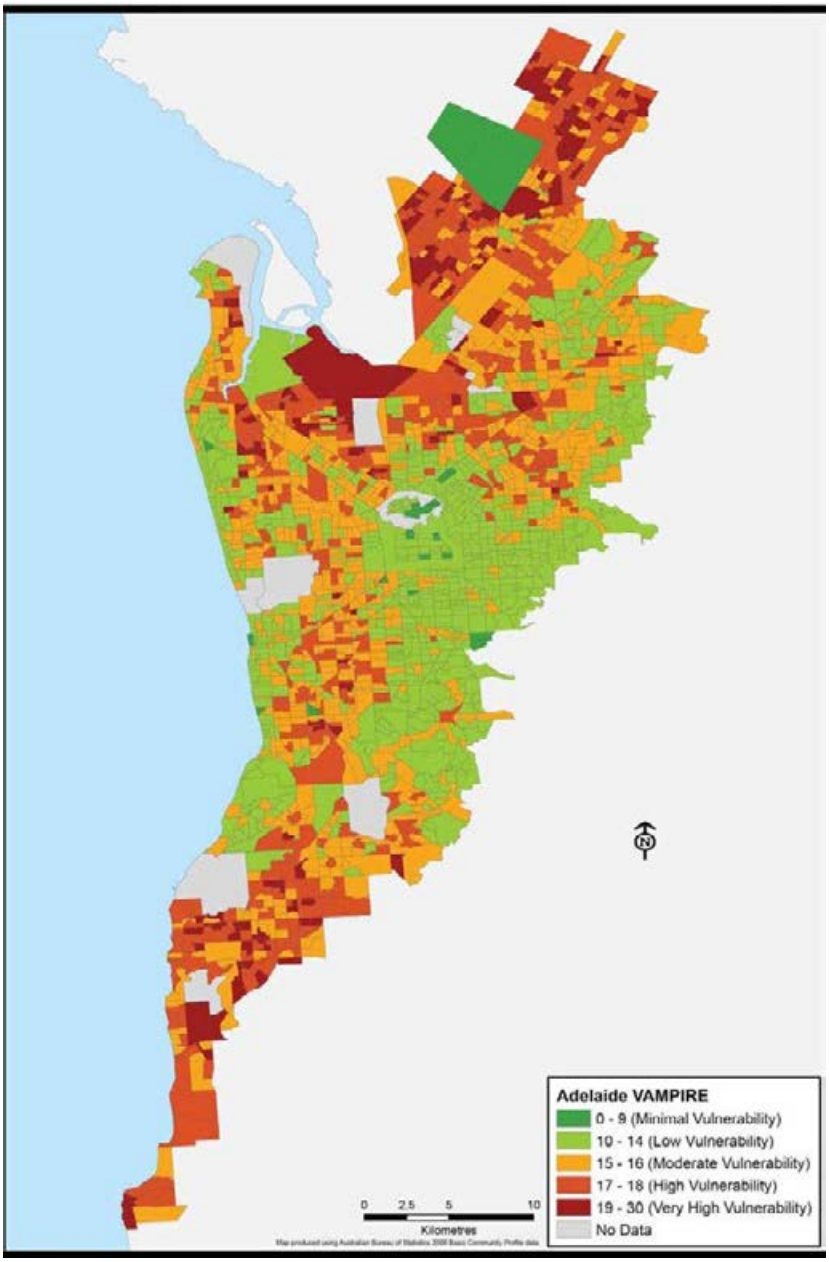
1.2. Development costs and Developer Contributions

There is never an easy time to discuss the question of developer contributions towards supporting infrastructure. It is however a necessary conversation otherwise either residents in new developments have inadequate services and degraded quality of life, or government ends up with a large unfunded liability for providing the required infrastructure later.

1.2.1. Cost of Living

For a healthy economy, the cost of development and supporting infrastructure needs to be balanced against the cost of living. There is ample evidence that, as remoteness from services and employment grows, private transport becomes a large share of household expenditure, creating financial hardship for households. At present Australia's housing market is reportedly the world's least affordable. Yet it would be regrettable if solutions to this were adopted that merely transferred the problem from high purchase cost to high living cost.

This was first quantified by Dodson and Sipe in the 2000s, and is now well established as the Griffith university "VAMPIRE Index" (Dodson and Sipe, 2008). Fifteen years later, while the original map did not then include Mt Barker, it could still be seen as a relatively accurate predictor of housing cost pressures.



VAMPIRE Index for Adelaide 2008

In recent Adelaide history there have been good and poor examples of these impacts. Developments such as Bowden, Mawson Lakes, Munno Para and Aldinga – Seaford were either infilled or followed existing public transport infrastructure. This resulted in good quality development with affordable access to services. Social outcomes in such developments are generally better for residents.

In other cases large scale urban development well beyond the previous extent of urban Adelaide was built in locations with poor access to local services or employment. This results in high time and financial costs to residents to access employment and services. This creates cost of living stress and mortgage stress. Addressing these problems in a post-hoc fashion is usually far more expensive than planned initial provision, as necessary land corridors have not been preserved.

Recommendation:

Planning schemes should target residential development to locations that have adequate schools, shops, recreational facilities, and public transport within a distance accessible within a 15-minute journey by active transport. There should be sufficient employment opportunities accessible within a 20-minute journey by motorised transport.

1.3. Infrastructure provision and market signals

Further to the above, and regardless of whether it is paid for by developers or taxpayers, the provision of trunk infrastructure, especially transport, is critical to the economic viability of areas for urban development (RBA, 2011). Road corridors typically act as the public space within which electricity, water and sewerage services are also provided. Without these, urban development may be impractical.

Given the importance of infrastructure provision to development, a transparent and predictable pipeline on which infrastructure can be expected to be constructed is an important signal to the development industry. In recent years this has become difficult to forecast. There has been a breakdown in bipartisan commitment to long term infrastructure planning and funding, especially at Federal level. This has limited the ability to forecast when required infrastructure will be built. This not only undermines public confidence in provision of services but adds to financial risk for developers. The current review of funded projects by Infrastructure Australia is understandable in this context, but itself adds to delay in provision. Some of the shortfall in housing supply at present should be seen as one of the regrettable consequences of this trend.

It is not suggested that this is the fault of the present state government. The previous Integrated Transport and Land Use Plan (ITLUP) (2015) was a positive step in this regard. However, it was discarded by the following State government without an effective replacement.

Recommendation:

Planning schemes should identify and cost the infrastructure and services required to support the intended development in the scheme. This allows the calculation of a headworks cost per lot for each development region. This is more efficient than developers calculating these costs individually for each development. The difference in costs between locations gives useful guidance to developers as to where growth should next proceed.

It is imperative also that these schemes and the overall GARP be seamlessly coordinated with both the recently released South Australian Infrastructure Strategy and the Renewal SA Planning Strategy 2023-26. Early review suggests that the GARP and each of these strategies

require further work to achieve coordinated alignment of their objectives and measurable outcomes.

References

A C Worthington, "The quarter century record on housing affordability, affordability drivers and government policy responses in Australia", International Journal of Housing Markets and Analysis, 27 July, 2012.

Jago Dodson, Neil Sipe, "UNsettlign Suburbia: The new landscape of oil and mortgage vulnerability in Australian cities", August 26, 2008.

M Kulish, A Richards, C Gillitzer, "Urban Structure and Housing Prices: Some Evidence from Australian Cities", RBA Economic Group Research Paper, September 2011.

SGS Economics and Planning, "Comparative Costs of urban development: a literature review", Final Report to Infrastructure Victoria, July 2016.

Related Discussion Paper Questions:

Q1 (page 36)

Four outcomes – Outcomes are supported but need transparent and quantifiable measures to achieve. Developer contributions will be needed to achieve them.

Q2 – (page 80)

Housing choices – Medium density housing is often found to be both affordable and desirable in other OECD jurisdictions. The absence of a normally efficient housing type (medium density) suggests a mismatch in cost allocation in planning processes, resulting in perverse incentives for less efficient types. Government should intervene if this option remains undersupplied.

Q3 – (page 88)

Living and working locally – Good provision for active transport (walking and cycling) is key to this. Quality of urban streetscapes is critical to walkability. Tree canopy and amenity is critical to achieving this. Inclusion of street trees as a mandatory feature of local residential streets must be implemented. Suburbs with mature trees are invariably the most popular (and expensive) suburbs. Climate change will increase the need for trees to keep streets habitable.

Q4. (page 115)

Greenfield development – For local living, local provision of human services and employment hubs is critical. Locations without these things should *not* be approved for greenfield development.

- Satellite cities like Murray Bridge and Victor Harbor either need major employers or frequent and reliable public transport links to major employment (i.e. Adelaide). If not they are unlikely to attract residents. Access to employment is a key driver of residential growth.
- We caution on too great a focus on greenfield development. It may be the form most attractive to developers in the absence of realistic infrastructure contribution schemes.

However in terms of total costs for both the State and residents and long term quality of life it may not be.

Q5 (page 127)

Infill development – This is generally a desirable form, provided it is achieved without compromising amenity such as via reducing tree-cover, noise impacts etc.

- These potential adverse outcomes can be addressed with appropriate standards.

2. Housing affordability, wastewater management and infill development.

2.1. Supporting Housing Affordability

Home building requirements specified under the Planning and Design Code can have a significant impact on the cost of building new houses and renovating existing homes. With the current housing shortages, and high cost of building new homes, it is recommended that the GARP includes measures to minimise further construction cost increases, whilst still maintaining other desired outcomes such as sustainability and equity.

The GARP indicates that it will support housing affordability by prioritising strategic growth and the release of serviced land. However, there are other ways that the GARP can support housing affordability, as discussed below.

2.2. Infrastructure cost implications of Infill Development

While infill development may appear more economically viable than greenfield development, proper consideration must be given to the ability of the existing infrastructure to accommodate house densification. In many cases, existing sewer, stormwater, water supply (including fire), electrical and communications infrastructure are likely already under stress, and will require significant upgrade to support infill development. This too often becomes the financial responsibility of local government rather than infill developers.

Recommendation:

To accurately assess the economics of infill compared to greenfield development and minimise risk potential associated with the presence (or absence) of existing service and system assets, a thorough infrastructure asset audit (to determine capacity and remaining asset life) should be undertaken in all local government areas under the GARP. This can then be used as a baseline to determine future infrastructure provisions and associated cost.

Infrastructure upgrades required to support densification of housing and growth of GARP areas should have preliminary designs and cost estimates prepared so that an accurate cost benefit analysis of infill vs greenfield developments can be made.

2.3. Risks and costs of on-site stormwater retention

Infill development increases the volume of stormwater runoff due to an increase in impervious areas.

Similar to point 2.2 above, it is unlikely that existing stormwater systems in GARP identified infill areas have sufficient capacity to cater for the additional stormwater runoff. As a result, on-site stormwater retention is required. There are various ways to retain stormwater on-site, all of which increase the cost of building homes.

There are also potential risks for houses where on-site stormwater retention is required, including potential damage resulting from injecting stormwater into site soils, as acknowledged by restrictions within the Minister's Specification SA 78AA, September 2003. That restriction took account of the reactivity of the site: "The use of on-site retention devices is restricted to soil types classified as class A and S or class M-D where the characteristic surface movement, (ys value), is equal to or less than 25mm, as defined in AS 2870…". The large majority of Adelaide and the Greater Adelaide region have reactive clay soils, and therefore on-site retention in the form of soakage beds is not likely to result in a good outcome.

Rain gardens and other WSUD methods that propose discharge of stormwater near a building are considered similar to soakage beds, and should be avoided where the site classification is more reactive than M-D. One viable on-site retention method would be to have an underground rainwater tank, with discharge to the existing stormwater system at flow rates not exceeding the existing stormwater outflows, however, this could increase the cost of a new home by around $20,000 per residence.

Recommendation:

The stormwater system for greenfield developments should be designed appropriately to accommodate the housing density of the development, and therefore on-site stormwater retention can be avoided.

Stormwater retention for infill developments should be achieved through rainwater tank collection, reuse, and discharge to the Local Government's stormwater system at predevelopment flow rates. The use of soakage beds, rain gardens and other measures which may cause abnormal soil moisture conditions should be avoided unless soil testing indicates that the soil profile is of low reactivity with respect to ground movement.

2.4. Wastewater management

The majority of areas nominated in the GARP for growth are serviced by a combination of a Community Wastewater Management Scheme (CWMS) within the existing township areas, and on-site wastewater management systems on individual allotments in the outer township, rural living and rural zones.

Most CWMS systems operated by local governments are operating at near full capacity. Infill development within these areas will further increase the wastewater loading to the existing wastewater system, which may require significant improvements to be able to treat the additional wastewater, with associated cost implications.

In areas not serviced by a CWMS, infill development should be discouraged, as all allotments must dispose of their wastewater on-site, which can occupy a significant area depending on the soil profile. To determine the minimum allotment size in an area not serviced by a reticulated

sewer or CWMS, soil assessments should be undertaken to determine the most appropriate treatment type and the required land application area for wastewater disposal. Typically, allotments should be greater than 1200m^2 in size to accommodate an on-site wastewater management system. This may impact the feasibility of infill development in many outer township areas.

Recommendation:

For greenfield development, allotments can be appropriately sized such than an on-site wastewater management system can be accommodated within the land area.

If small block sizes are desired, the development can include a CWMS for wastewater management. In the case of a new CWMS, design of the wastewater system should consider whole of life costs including ongoing maintenance, power demand, water reuse potential amongst many other factors.

As the Local Government Authority (LGA) typically owns and operates these systems once development is complete, it is recommended that each LGA is consulted and a set of guidelines be developed to ensure all developments are delivering sustainable, low power and low maintenance wastewater management solutions.

Related Discussion Paper Questions:

Pg 72 What else can the GARP do to contribute to a strong economy built on a smarter, cleaner & regenerative future

Pg 115 How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

Pg 115 What do you see as the benefits and potential drawbacks of greenfield development?

Pg 127 How can infill development achieve an urban form that is consistent with the principles of Living Locally?

Pg 127 What do you see as the benefits and potential drawbacks of infill development?

3. Transport

An efficient land transport system that supports Greater Adelaide's Regional Plan for passenger and freight tasks is integral to our economic success and quality of life. According to the BITRE year book, travel by motorised ground transport is 316bn passenger km each year. For a population of over 25 million this equates to approximately 12,500km travel for each person in the country.

For Adelaide, the total passenger km travelled have grown from 9.5bn km in 1976-77, to 14.6bn passenger km in 2018-19. This coincides with a change in population of the Greater Adelaide Area from 940,000 in 1976 to 1.39m in 2019. Figure 1 below shows that the vast majority of this travel is by passenger cars. The average travel by car in Adelaide has barely changed over this period and is now just over 8,600km per person.

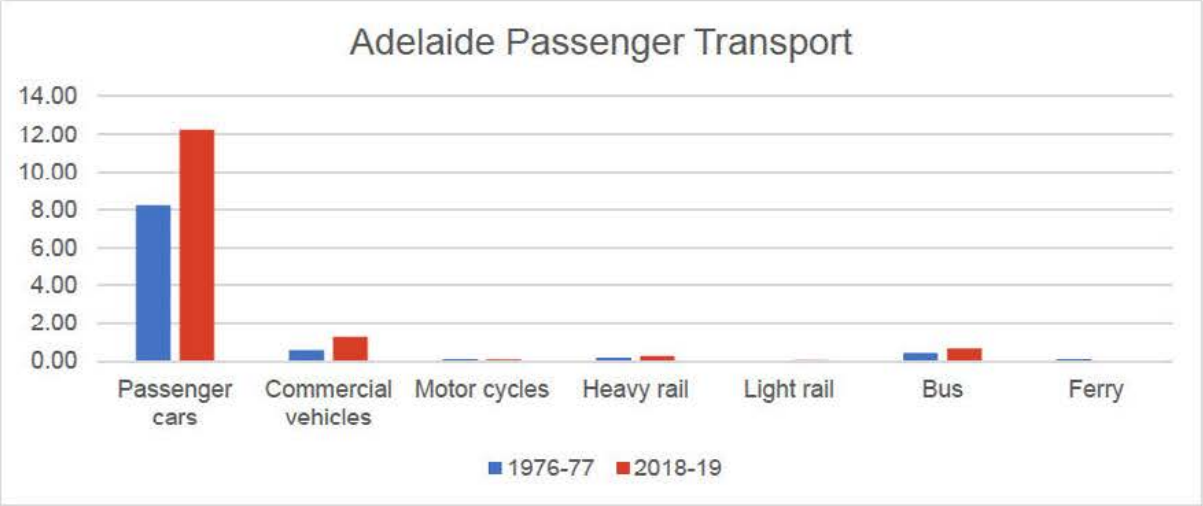


FIGURE 1 - ADELAIDE PASSENGER TRANSPORT - BN KM TRAVEL[1]

Adelaide's population has also grown at a much slower rate than other smaller cities in Australia. Figure 2 shows that from a similar base in the early 1970's, Brisbane has grown to have almost twice the population of Adelaide while Perth started from a smaller base and overtook Adelaide in the mid 1980's.

[1] BITRE Yearbook – 2022 Tab e 5.3d (Extracts for 1976-77 and 2018-19) - https://www.bitre.gov.au/pub ications/2022/austra ian-infrastructure-and-transport-statistics-yearbook-2022

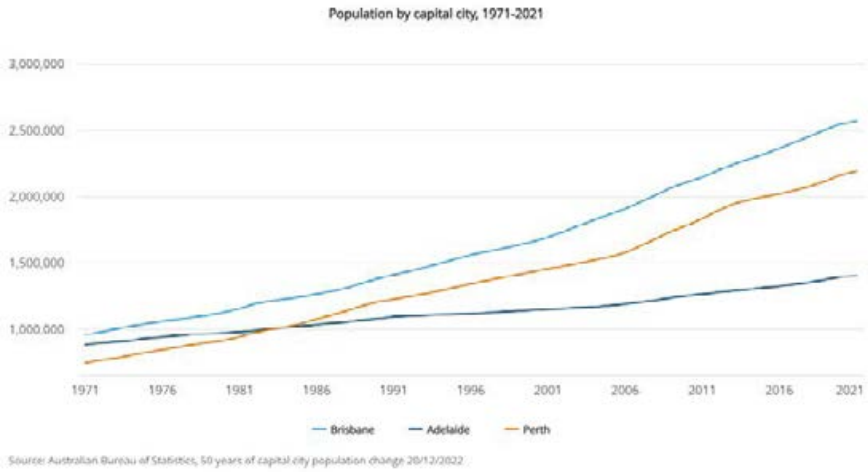


FIGURE 2 - POPULATION CHANGE 1971- 2021[2]

Car, bus, rail and active transport all have a role to play, but we can see the overriding trend has been for reliance on passenger cars as the predominant form of transport in recent decades with other modes performing minor secondary roles for most tasks.

As journey times and distances in Australia's major cities tick upwards with average commutes in the vicinity of 55 minutes and over 50 km in some areas, efficient and effective transport plans need to be an integral part of the growth and development strategy.

Recommendations:

To help underpin effective transport outcomes the GARP should adopt a set of transport principles and performance goals which anticipate future population needs. The development of an **Adelaide Transport Concept of Operations** can help articulate the principles, goals and performance measures which underpin effective decisions on transport mode designs and investments and shape future user preferences by:

- Setting out design principles for hub based urban and job precincts to encourage local living, working and delivery of essential services and reduce the level of commuting and automobile use
- Establishing medium and high-density housing designs, integrated local green zones and quiet areas which are desirable for high quality of living
- Establishing goals and measures for access to high efficiency transport including:
  - capture zone densities and distances to transport services which promote mode shift to more energy efficient transport and in turn, lead to lower road traffic volumes
  - local routes designed to visit services for multi task trips
- Identifying corridors for where longer distance intra-city transport can be segregated by mode to enhance efficiency
  - Separate bus lanes
  - Segregated tram lines

[2] ABS – 50 Years of capita city popu ation change

- Express lines for outer suburban trains

- Establishing higher standards and goals for intermodal connectivity performance
- Development of goals and measures for travel times and distance such as:
  - Minimum average journey speed of 40km/hr over 5km distance (for all motorised modes)
  - Minimum average journey speed of 60km/hr over 10km (for all motorised modes)
- Maximising First and Last Mile solutions by
  - Establishing access goals such as
    - Each new home to be no more than 400m from an accessible public transport mode
    - Minimise access barriers such as through roads in high density zones (take them around)
    - Access frequency of no more than 15 minutes between pickups
  - Use of trams in local zones to enhance accessibility and comfort
    - Trams integrate well with local use due to predictability of movement on a track and ability to build accessible platforms
  - Investigate future transport technologies and a road map for introduction of autonomous vehicles to:
    - support local muti-task trips such as shopping and medical visits
    - reduce levels of vehicle ownership and enhance access to services for aging population

Provide low cost or free local transport within new urban zones to encourage local living.

Related Discussion Paper Questions:

Primary question in GARP of how Adelaide should grow?[3]

What are the measures of outcomes?[4]

Explore other technologies[5] (including last mile solutions)

[3] GARP – P 15 – How shou d Ade aide Grow?
[4] Measures of outcomes on P36
[5] Exp ore other trends and techno ogies – GARP P37

4. Natural Hazards, Water, Greening, and Infill Development

4.1. Climate Change and Resilience

The objective for *a greener, wilder and climate resilient environment* is important in the face of challenges presented by climate change. However, this objective doesn't currently acknowledge that land use planning is widely recognised as an important element in building community resilience (AIDR 2020). Engineers Australia's position on climate change recognises that immediate action must occur to improve the resilience of communities, the environment, and infrastructure.

Recommendation:

It is recommended that this objective also include *resilience of people, environment and built infrastructure.*

This will have greater alignment with SPP 15 (Natural Hazards) which has the objective to build resilience of communities (people), development and infrastructure from the adverse impacts of natural hazards.

Additionally built measures that can be implemented to have a cooling effect, including requiring houses to have a light-coloured roof, and constructing roads with lighter coloured materials, could then also be addressed in GARP.

4.2. Natural Hazards and Resilience

Throughout the discussion paper there are numerous references to building in the 'right places' and 'avoiding areas of high-risk flood and bushfire', which is admirable and supported, however these are often countered in the discussion paper with 'unless the threat can be mitigated through policies' or 'unless mitigation is cost-efficient'.

Climate change is a complex and multifaceted problem that requires both mitigation and adaption. Dedicated support, including from engineering, must be provided to vulnerable communities, like those at most risk of natural hazards. A 2016 Deloitte report showed that the social costs of natural disasters are equal if not more than the direct economic costs.

Governments and industry must take coordinated action to reduce disaster risks within their control (like through planning policies) to limit adverse impacts on communities. (AIDR 2020)

Preferably the GARP would not encourage development in areas of high-risk. Areas along flood prone rivers for example should be retained for open space (linking to the greening objectives). However, if we are left with no options but to develop near or on flood and bushfire prone areas, making sure our communities are aware of their risk is critical.

The GARP discussion paper speaks to the new state-wide mapping for riverine and surface water flood hazards and bushfire hazard, however, does not explicitly explain how this knowledge about hazards will be used by GARP.

Recommendation:

GARP should openly acknowledge if proposed growth areas are impacted by natural hazards and explicitly include hazard risk strategies to address this. This may mean developing

guidance for developing on a floodplain (like used in Victoria) and master planning to anticipate multiple options for emergency access to communities.

More broadly, planning policies should ensure that all new homeowners are directly made aware of their exposure to natural hazards AND require built form to be adaptive and resilient to future hazards (e.g. flood, extreme heat, bushfire).

References

AIDR, *Land Use Planning for Disaster Resilient Communities* (2020).

Engineers Australia, *Our Position on Climate Change* (2021)

Deloitte, *The economic cost of the social impact of natural disasters* (2016)

Related Discussion Paper Questions:

What do you think of the four outcomes guiding how Greater Adelaide should grow (P37)

What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment (P57)

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region (P64)

5. Greening

5.1. Achieving Greening Outcomes

When considering greening, tracking tree canopy as a measure is well supported. However, there are many published studies and planning policies around Australia and internationally which recognise that greening can comprise different kinds of green infrastructure, like grass, shrubs, green walls and roofs, wetlands, and trees. Currently the 30 year plan has a target to increase tree canopy by 20 per cent by 2045. But setting green targets is not going to be one size fits all. Greening may not always mean trees. Different areas of Greater Adelaide have different densities of people, buildings and infrastructure and it will be critical that engineers, planners, and community work together to consider what is achievable for different land use areas.

Urban infill, for example, has challenges of contested space for essential services and how we engineer space for greening will be complex, yet equally critical to ensure these areas don't lose the social and environmental benefits of green space.

Green corridors along natural waterways should be expanded upon and utilised environmentally and socially to their fullest. New developments should be setback from such corridors.

Recommendation:

1. Quality public green space should be available to everyone within close walking distance of their home (e.g. 10 minute walk). This means GARP may need to identify areas for public green space, including in infill zones, to enable this.

GARP should identify areas that can support urban infill without compromising green infrastructure, built infrastructure and public services to avoiding generating issues like increase stormwater runoff and local flooding. Equally GARP should acknowledge where small scale infill (like the 1 into 2 type development) cannot be supported.

GARP should encourage minimum standards for roadside greening for all new road projects.

The implementation of increased greening and WSUD targets should be supported by master planning and controlled either by the local council or the state government.

2. GARP should recognise greening as more than tree canopy cover. There should be frameworks and targets to incorporate more kinds of green infrastructure in the regional plan.

5.2. Cost impacts of tree canopy overlay areas

Engineers Australia has previously expressed concern that the existing planning requirements for the Tree Canopy Overlay area mandating deep rooted planting zones and the planting of trees within housing allotments is in conflict with the requirements of the National Construction Code (NCC).

This has led to consumers having to accept a higher risk that the structural performance of their home would be less than Performance Standards set out in the NCC (within AS 2870 – 2011). There is also increased financial risk to homeowners and potential Professional Indemnity insurance risks for engineers.

The tree canopy overlay requirements for the Adelaide region has resulted in significantly larger house footings being designed to minimise the amount of footing movement due to the

increased drying effect that trees have on a soil profile. This has increased the cost of building a house, and where the soil profile consists of deep reactive clay soils, the increase in footing construction costs is significant.

Recommendation:

It is recommended that the Tree Canopy Overlay requirements under the Planning and Design Code are not extended to the GARP areas.

There is likely more opportunity for open space and extensive tree canopy in greenfield sites. Greenfield developments can be planned and built to support tree planting setback requirements from structures. Furthermore, because of this opportunity, financial offsets should not apply in these areas, and greening should be mandatory. The GARP should identify minimum areas for public green space in the greenfields development areas it highlights and make this greater than the minimum planning and design code requirements. This could increase tree canopy in outer suburbs where currently greening is lower and address the social inequality in access to green spaces that we currently see across our city.

Related Discussion Paper Questions:

What are the most important factors for the Commission to consider in meeting future demand for open space? (P165)

What are the most important factors for the Commission to consider in reviewing and achieving Urban Green Cover Target (P165)

6. Future-Proofing

6.1. Climate risk

The GARP discussion paper highlights climate resilience as one of its four guiding outcomes. The paper focuses on the asset risk associated with bushfire and floods, in addition to water supply. The paper talks to the Resilient Water Futures work currently being conducted by SA Water[1]. Engineers Australia recommends that these discussions are expanded to other critical services such as electricity, wastewater, food supply and freight routes. A changing climate may impact these critical services that provide support to the communities within the Greater Adelaide Region. It is also important to note that some of these services, such as food supply, may be sourced from outside the region.

In addition to physical asset risk, the social impacts of climate change should be considered[2]. Limited discussion was present on how the changing climate may impact the region. Such risks may include the risk to local agriculture, such as wine production, and the resultant impact on the local economy.

Recommendation:

GARP should actively address the impacts of a changing climate in a social context, including the adverse effect it may have on the vulnerable members of the community and include measures to mitigate or manage these.

In particular, Engineers Australia recommends that a climate risk assessment be undertaken to determine the capability and capacity of Greater Adelaide to be resilient to changes in the climate, including temperature change, and extreme weather conditions (fire, drought, rainfall/flooding, etc).

Engineers Australia recognises the scale and urgency of the challenges presented by climate change, which are outlined in our position statement[3]. Engineers Australia is currently developing climate risk tools to assist our members and the wider community better prepare for climate change. In addition, Engineers Australia is working with the Department of Climate Change, Energy, the Environment and Water on the National Climate Risk Assessment[4]. Engineers Australia is happy to support and work with the commission on future development of the GARP regauging climate risk.

6.2. Sustainability

Sustainability was a key focus of the GARP discussion paper, highlighting the need for more regenerative and nature positive communities. The paper outlines that this is to be achieved by a regenerative approach to planning and development. It is recommended that GARP considers the following key drivers:

Circular Economy

The move toward a circular economy is a major trend that is gaining increased interest in the construction sector. Through Green industries[5], South Australia is leading the nation in the circular economy space. GARP may consider a circular approach to development by considering waste management in the planning phase. The ultimate goal of a circular economy is that waste disposal is completely eliminated from the supply chain through the use of recyclable and reusable materials. GARP is an opportunity to consider products that can be

completely reused or recycled at the end of their useful lives or products that utilise waste by-products, such as recycled rubber in asphalt or SCMs in concrete.

In addition to specifying circular products, the outcomes of the GARP should consider a whole of life approach from an infrastructure management perspective. With 27 local government areas potentially involved and responsible for the long-term maintenance of the infrastructure, consideration should be given to the current challenges that these local government areas are facing. The 2022–23 Advice to Local Government by ESCOSA8 gives an excellent insight into the challenges of SA local governments. Some of these challenges include skill, staff and funding shortages in areas such as engineering and asset management. Consideration should be given to how GARP can support LGAs with long term maintenance and asset management strategies for proposed infrastructure.

Addressing these challenges will be key to ensure that the facilities and services provided to the Greater Adelaide Region are maintained at the require service level to meet the needs and expectations of the community.

Recommendation:

The GARP should address the increased waste associated with the proposed development and resulting population growth. A waste management strategy should be developed that includes opportunities for circular products, and opportunities for recycling and reusing waste materials.

The GARP should review and incorporate the findings of the ESCOSA Advice to Local Government findings for areas with proposed development. Considerations should be given to the asset management and maintenance strategies of those local government areas and identify how these authorities can be supported to maintain the desired service levels of any new assets.

Embodied Carbon

The South Australian Government has committed to achieve Net-zero Greenhouse emissions by 2050. As such, embodied carbon should be considered at the earliest planning stages, where development has the highest potential for carbon reduction[6]. The GARP presents an opportunity for a greater focus on reducing emissions within the community infrastructure, particular Scope 3.

Recommendation:

The GARP should address the need to identify opportunities for emission reduction during the planning phase of development, encouraging suppliers to embrace greener practices through procurement. Providing guidance for local business and residents to reduce emissions from operations are also ways in which GARP may lower the embodied carbon of the region.

Engineers Australia is a supporter of the Materials and Embodied Carbon Leaders Alliance (MECLA)[7] and, through MELCA, is actively involved in the working groups that are driving reduction in embodied carbon in the building and construction industry. Engineers Australia is happy to provide any advice or guidance in this area.

Micro plastics

Micro plastics are an emerging contaminant and should be considered as a future driver. South Australia is leading the nation in limiting single use plastics and this is expected to continue into the future.

Recommendation:

GARP should consider opportunities to reduce plastic where possible, particularly in areas that are upstream of environmentally significant areas.

References

1. https://watertalks.sawater.com.au/resilient-water-futures
2. https://www.worldbank.org/en/topic/social-dimensions-of-climate-change
3. https://www.engineersaustralia.org.au/sites/default/files/2022-06/climate-change-position-statement-2021.pdf
4. https://www.dcceew.gov.au/climate-change/policy/adaptation/ncra
5. https://worldgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2022/09/22123951/WorldGBC_Bringing_Embodied_Carbon_Upfront.pdf
6. https://www.greenindustries.sa.gov.au/driving-the-circular-economy
7. https://mecla.org.au/partners/
8. https://www.escosa.sa.gov.au/advice/advice-to-local-government

Related Discussion Paper Questions:

What do you think of the four outcomes guiding greater Adelaide should grow? Are there any other outcomes that commission should consider? (Page 37)

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers? (Page 37)

What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment? (Page 57)

What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smart, cleaner and regenerative future (Page 72)

7. Learning from past experience

7.1. General

Members of Engineers Australia have experienced first-hand the effects of living and working in regions that have experienced ad hoc development that lacked thoughtful and integrated design, and conversely regions that have been the by-product of policymakers who have taken holistic approach to planning. The difference is pronounced.

As a professional association driven to act in the best interests of the community, and specifically by advancing society through great engineering, Engineers Australia is an ardent supporter of a holistic approach to planning. Explicitly considering all elements of design allows for simpler, more elegant, and ultimately, more cost-effective, robust solutions to be developed, and it's this integrative approach that is most likely to lead to environments that deliver better family, occupational, and socially rewarding outcomes for their inhabitants.

7.2. Mount Barker Growth Area

In 2010, the 30 Year Plan for Greater Adelaide nominated Mount Barker as a strategic growth area (Government of South Australia, 2010 p.84) and highlighted the need to ensure that this area was connected with public transit, even noting planned mass transit on the mass transit infrastructure map (Government of South Australia, 2010 p.115), connecting Mount Barker to Adelaide. However, the details of what would trigger this investment were not discussed, and the fact that it wasn't included in the Infrastructure Targets demonstrated that the requisite level of detail wasn't developed and was inconsistent with the aim to reduce Adelaide's car dependency and increase public transport utilisation. As a result of the growth area development without an increase in the infrastructure to accommodate the vehicles, Mount Barker and its surrounding areas experienced marked increases in traffic congestion, and the outcome was inconsistent with other aims of the plan.

Further to this, there was also no mention of the necessary expansion of the wastewater treatment system that would be necessary with increase in population, which formed part of SA Water's regulatory business proposal in 2013 (p.96). Nor was there consideration of the potential opportunities to capitalise on efficiencies by developing common infrastructure that could be shared with other Adelaide Hills population centres. The business opportunity discussion launched by SA Water in 2018, is a good example of potential new industries and developments that could be introduced.

Ultimately, the inconsistencies of the way that the Mount Barker growth area was brought to fruition led to other challenges that limited the area's growth potential, particularly the development of higher-technology businesses in the local area.

Recommendation:

The GARP should require that the impacts of growth areas on infrastructure provisions and services be properly identified, defined, and trigger points determined for implementation.

Responsible parties (State or Local Government or Land Developer) to both fund and provide relevant infrastructure must be identified and necessary agreements (including funding) put in place prior to land development commencement. This should include all relevant infrastructure, including for example, road and other relevant transport infrastructure, public transport services, wastewater treatment provisions, stormwater management systems and the like.

Importantly, this infrastructure should complement and enhance existing infrastructure systems and networks.

7.3. Optimising choices, improving lifestyle, reduced travel, improved liveability, good place to live and work

The Greater Adelaide Regional Plan places increased emphasis on the need for improved liveability, equity of access, social outcomes, and strong opportunities for economic development. Engineers Australia supports these outcomes and is heartened by the recognition that decentralisation is a significant driving factor, and that continuing to deliver comparable levels of service to all parts of Adelaide (both inner and outer metro/inner regional) is central to achieving this outcome. This decentralisation offers the potential to downscale the sizing of roads and other transport infrastructure, but this would only be successful if there is continued investment in the other things that support strong communities – giving people reasons to live, work, and be part of a strong community.

Recommendation:

To help facilitate strong, continued, and consistent growth, Engineers Australia recommends that the GARP include the frameworks that require consideration when looking to undertake material levels of development in a region. This would aid in ensuring transparency and a shared expectation for all parties, and that the residents and workforce will be afforded the greatest opportunities for success.

Future proofing, flexibility

The early-mid 2010s was also a period of significant technological development, and the NBN project commenced a few years before the 30 Year Plan for Greater Adelaide was released. There was a common recognition that the rapid and sustained shift towards an internet-centric society was underway. Even in the mid-2000s, there was acknowledgement that the NBN's use as an infrastructure network to connect and enable Australian society's advancement would facilitate the uplift of many regional locations, and allow the macro trend of digitisation to permeate all of the country, and not leave pockets of society behind.

Despite the NBN ultimately becoming the victim of partisan politics, there was an understanding that this kind of infrastructure was an enabler, and that ensuring infrastructure is designed with an eye to the future offered the best chances of success for assisting communities to foster economic development. The Government of South Australia and the Adelaide City Council recognised these early, and through deployments of the GigCity and 10 Gigabit Adelaide networks, provided opportunities for businesses to continue to develop and offer leading edge solutions to global clients.

Engineers Australia wishes to highlight that these types of infrastructure are central to the continued success and growth of the Greater Adelaide area and are an essential consideration.

Recommendation:

The GARP must reflect the need for both infill and greenfield development to be flexible, resilient and able to respond to ever-changing developments, including technology,

digitalisation, climate change, changing work patterns and future challenges that are yet to be identified.

Key measures should include (but not be limited to) transport corridors, telecommunications capacity and general infrastructure capacity margins for population growth.

References

- The 30-Year Plan for Greater Adelaide: A volume of the South Australian Planning Strategy, Government of South Australia, 2010
- https://www.sawater.com.au/__data/assets/pdf_file/0008/9458/REGULATION-Full-Regulatory-Business-Proposal.pdf
- Business Opportunity: Mount Barker Irrigation Scheme, SA Water 2018. https://www.sawater.com.au/__data/assets/pdf_file/0006/258558/Business-Opportunity-Mount-Barker-Irrigation-Scheme-2018-v4.pdf
- https://gigcity.com.au/about/benefits-for-business
- https://www.cityofadelaide.com.au/business/ten-gigabit-adelaide/

Related Discussion Paper Questions:

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region (P64)?

Pg 115 How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

Pg 115 What do you see as the benefits and potential drawbacks of greenfield development?

8. Outer Suburban and Regional Growth Areas

The GARP discussion paper recognises the increase in regional growth across South Australia and refers to the Regional Plans that have also been prepared to provide a more holistic planning perspective for residential growth across the state.

While both the GARP and Regional Plans recognise the need for supporting infrastructure including transport, energy, water, telecommunications, health, education and the like, Engineers Australia emphasises the need to ensure this infrastructure is provided in a manner that fosters, supports and sustains population growth. Further, employment opportunities must be created and nurtured within growth areas to retain thriving communities (measured not only by population but a younger average age of residents).

Much information has been gathered on these issues through the National Growth Areas Alliance (NGAA); the peak body for local governments in Australia's outer metropolitan growth areas.

The NGAA has prepared a 2023-24 Pre-budget Submission which addresses these and other issues as identified through the experience of growth area member councils nationally. This submission provides four key recommendations for consideration and action, including:

- Creation of climate adapted, resilient suburbs
- Key infrastructure needs, including the need for a financing mechanism to secure delivery
- Unlocking economic (and employment) potential of growth areas, and
- Social infrastructure requirements.

Recommendation:

The broad infrastructure, economic, employment and social issues described in these recommendations align with EA's concerns regarding successful development of outer suburban growth areas. We strongly suggest that the learnings and broad recommendations contained in the NGAA submission be carefully considered and further explored in the South Australian context.

Related Discussion Paper Questions:

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region (P64)?

Pg 115 How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

Pg 115 What do you see as the benefits and potential drawbacks of greenfield development?

9. Adaptive Reuse

The GARP Discussion Paper provided the following discussion points which are relevant to Adaptive Reuse:

We Need More Homes

The land supply projections for residential land across metropolitan Adelaide indicate that there is 15 years supply currently available. This Discussion Paper looks beyond this. Working in collaboration with the new Housing Infrastructure Planning Development Unit, the Commission aims to ensure adequate supply through to 2050 and beyond.

We Can Do Infill Better

With a master planned approach, we can achieve higher densities that offer diverse and affordable housing close to businesses and industry. Strategic infill makes sense environmentally and economically, and development is already underway in many identified infill sites. Finding new larger infill sites will take time and coordination between landowners, councils, the community and government.

SPP 3 – Adaptive Reuse

Identify opportunities to enhance areas of cultural or heritage value. Identify underused buildings to provide cultural, social and economic benefits and target for investment (include underused historical precincts and assets). Addressing planning challenges such as airport building height limitations, adaptive reuse of heritage buildings and the activation of ground floor spaces will help realise the growth potential of the city centre. Whether for student housing, essential workers accommodation, apartment living, adaptive reuse of heritage buildings or office space conversion, city developments must be attractive and affordable for the diversity of residents choosing to call the city home.

The following key observations have been made:

Observation 1: Adaptive Reuse of C-grade and D-grade office buildings for student housing has been successful in the past because the planning regulations do not require carparks within the building. Making student housing apartments attractive to students helps reduce supply-side pressure on conventional rentals.

Recommendation:

Increase the flexibility in planning conditions by taking a "precinct" approach during the planning approval process to broaden the ability to integrate the needs of living and services to a greater range of users. Example: Provide access to carparks in a shared facility within a precinct that serves many residential buildings rather than provide access to carparks within each individual building in the precinct.

Observation 2: The City of Adelaide is funding an adaptive reuse project leader to scout out buildings which are potential candidates for conversion. Dr David Ness from UniSA recommends that a 'precinct' approach be adopted. The ***Property Council of Australia: Office Market Report, July 2023*** summarises current commercial building vacancy rates.

It is worth noting that:

- The last time vacancy was this high in Adelaide was in January 1998 (19.2 per cent vacancy)
- In 1998 the total supply was 1200 sqm. Today it is 39,500 sqm so the office market remains healthier than 1998 based on demand which is 3 times the historical average.
- Demand is higher now (14,270sqm) than compared to January 1998 (8,900sqm).
- The national vacancy rate is at the highest since July 1995 (14.5%)

Recommendation:

Provide educational material about adaptive reuse to commercial building owners to guide them through the process of converting their buildings to apartments (with assistance from Engineers Australia and like-minded advisory bodies).

Observation 3: The 'Deemed to Comply' approach to compliance upgrades for building conversions makes them uneconomical (both in terms of capital cost and long-term energy consumption). Alternative performance-based approaches can reduce conversion costs provided that the relevant authorities can provide concessions (ie less carparks for non-student housing). Another challenge is these alternative solutions require more innovative structural and fire engineering and, while the owner may understand the value of their work, they need to be assured that a less expensive long-term outcome is possible before they commit to the fees (a chicken and egg problem). This problem is exacerbated by the lower incentives for banks to issue loans for residential conversions as opposed to commercial refurbishments and new residential developments.

Recommendation:

The City of Adelaide to provide funding for a "Triage Service" of existing buildings to induce building owners to explore compliance options with reduced financial risk. Data needs to be gathered so that vacant buildings can be identified, and their embodied energy measured. Funding can be tied to carbon reduction KPIs which may also attract banks and external funders targeting those same carbon KPIs. Increasing the population of rate paying residence in the city will provide a return on this investment for the City of Adelaide.

DTI:PlanSA Submissions

From: Geoff Hayter <[redacted]>
Sent: Monday, 6 November 2023 2:30 PM
To: DTI:PlanSA Submissions
Cc: [redacted]; Christine James; David Gill
Subject: GARP Submission - Friends of Willunga Basin
Attachments: GARP Submission FOWB Nov 23.pdf

Follow Up Flag: Follow up
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You don't often get email from [redacted]. Learn why this is important

Dear Plan SA,

Please find attached our submission on the GARP Discussion Paper.

We would welcome the opportunity to speak to our submission should this part of the process.

Regards,

Geoff Hayter

Geoff Hayter
Chair

[redacted]

Friends of Willunga Basin inc.
15 High St, Willunga 5172 Chair: Geoff Hayter Sec:Christine James email:secfowb@gmail.com

Friends of Willunga Basin inc.
15 High St, Willunga, 5172 Chair: Geoff Hayter Sec:Gina Kellett email:secfowb23@gmail.com

Attention: Growth Management Team Planning and Land Use Services
Department for Trade and Investment
E: plansasubmissions@sa.gov.au

6 November 2023

Greater Adelaide Regional Plan (GARP) Discussion Paper

This submission by Friends of Willunga Basin (FOWB) responds to the Greater Adelaide Regional Plan (GARP) Discussion Paper through a local (Willunga Basin) lens.

To begin however, it is necessary to acknowledge the broader context of the 'whole of city' document that the Paper comprises.

To this end, we have seen and read submissions made by, firstly, Messrs Hamnett & Kellett and, secondly, the Transport Action Network. We concur in very high degree with the opinions and sentiments expressed in each of them.

It follows that we believe the planning approach proposed in the Discussion Paper is not fit for purpose in several key areas, including in the inadequacy of its climate response, its failure to link land use and transport planning and its apparent rejection of the compact city model that has underpinned development planning in Adelaide for the last generation or more.

To this end, we think it important for the State Planning Commission (SPC) to pause and reflect on its duties under law. After several years of investigations and discussion, the SPC was established to provide independent and expert advice on planning matters. This followed a period where poor long-term decisions adversely affecting the State were made. Governments and Ministers come and go, but Parliament gave the Planning Commission the responsibility to rise above this and to deal with long term issues and trends via the provision of free and frank advice which transcended short term political interests.

In this respect the Discussion Paper's positions on key topics – climate change, growth management, transport and infrastructure – are of serious concern, are not supported by objective evidence and pose serious long-term risks to the State.

We note for example that the Paper has no accepted framework for the UN sponsored Sustainable Development Goals. Instead, it uses a high projections population framework favoured by property interests but not supported by demographers, pays scant regard to an ageing population and reduced household size as key drivers of housing demand, uses COVID-inflated greenfield starts via Home Builder to establish a baseline and adopts the Urban Development Institute of Australia (UDIA) mantra of the need for a guaranteed 15-year land supply pipeline. Against the former, it is household formation rates, not population growth, which drives housing demand. As to the latter,

we think it a furphy because it is hard to imagine what residential infrastructure headworks could not be delivered within (say) a 10-year time frame.

Our primary submission therefore is for the SPC to reflect on its legislated duty – which is not to the government of the day, but to the current and future populations of the state.

From this starting point, achieving, on the one hand, net zero goals for new development and built form and, on the other, a range of 'living locally' outcomes, should be the key strategic underpinnings of any plan for the future of Greater Adelaide – with the net zero criteria being the real litmus test. Both objectives mitigate against increasing the rate of greenfield development and require a far greater focus on non-car modes of transport in all their forms than the car-centric approach implicit in the Paper.

Regarding the reorientation towards greenfield development, Adelaide is a global leader in low density living and has no need to extend this lead. There is ample opportunity to increase the density of the existing city – including through increasing the intensity of population in the CBD, around existing regional and district centres, along established transport routes and in a number of middle ring suburbs.

On the back of changing demographics and household formation rates, the housing market has demonstrated an increasing appetite for such development in reasonable proximity to capital city facilities and services. That appetite should continue to be fed by continuing to plan for a more compact city. Since the early 1990s we understand that Adelaide has seen a 78% increase in single person households, a 52% increase in households with no children and a mere 3% increase in households with children. We ask what research into housing preferences has been undertaken by the SPC, and what evidence there is that these trends are supported by the urban growth model proposed.

While it is not necessarily as easy as greenfield development, infill housing is not a new idea across the globe. As above, it is also what consumers want. We know that a staggering increase of almost 150% is expected in people aged over 80 by 2051. As all infill developers know, demand from this cohort comes predominantly from nearby locations for well understood reasons.

The key trend is relative proportion of what kind of development is required. In the past 5 years, greenfield fell to 20% with general infill at 38% and strategic infill at 29%. Greenfield development did increase during COVID to 27% on the back of the greatest stimulus to the market seen in a generation. The Commission surely cannot accept this as a basis for planning.

The Commission might consider bringing forward case studies to illustrate how these challenges are being met in other places. It can be done. We need an Adelaide specific plan, but we don't need to reinvent the wheel to get there. Master-planning key suburbs is the obvious method to employ.

More locally, FOWB welcomes the exclusion of land within the Character Preservation (McLaren Vale) Act 2012 from consideration for urban development. We shudder to think what future might have been proposed for the region had this legislation not been enacted.

Conversely, FOWB (as any fair-minded objective analysis would) rejects the notion of Victor Harbor/Goolwa being developed as a major regional population centre/satellite city. To begin with,

the cost of transport connections would be completely prohibitive, making the idea economically implausible from the outset.[1] Beyond this, we question what employment base might reasonably be developed in these locations, what carbon impacts such a decision would involve and, again, what analysis has been done.

Beyond this, the idea of a satellite city (as opposed to a new regional centre) warrants consideration, but there should be a focus on one location so that it can be developed at scale and can become a place where people truly want to live *and* can find meaningful employment. This might mean a population of say 250,000 over time, on which basis the Victor Harbor/Goolwa region simply does not have a land supply that is reasonably capable of being developed at reasonable cost at the scale that would be required.

Conversely, Murray Bridge/Tailem Bend (like, for example, Albury-Wodonga) has the capacity and the initial connectivity, both east and west (via freeway, and there is a rail corridor), to make the creation of a satellite city a plausible objective. Next on from Mt Barker. Logical and "orderly" – a basic planning concept. Alternatively, perhaps the Commission should be investigating potential for growth in other Regions of the State, rather than the entirely Adelaide-centric model presented in the Paper.

To conclude, we again remind the Planning Commission of its duty to be independent of government and of vested interests. In this regard, we consider the Discussion Paper to be conceptually flawed in its approach. Other approaches, such as those posited by the aforementioned Sustainable Development Goals, are available. There is also no Urban Design Framework provided to express desired physical form. Consumer trends are put to one side in favour of land harvesting for growth, predicated on weak and flimsy foundations and analysis. We ask by whom this direction is being set, and in whose interest, because we don't believe that it is for the benefit of the community at large.

Lastly, as to the Questions posed in the Discussion Paper, FOWB's (brief) responses are as follows:

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

Additional outcomes are required, including 'Planning that is consistent with achieving net zero carbon emissions by 2050' and 'Planning that is integrated with a holistic approach to Transport Planning'.

The requirement for expansion of tree canopy and re-wilding across the city also needs to be made explicit.

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?

[1] Current roadworks on South Road and Victor Harbor Road are costed at something over $50 mill per kilometre ($680 mill for circa 12.5 km of road). At this rate, we suggest that duplicating Victor Harbor Road all the way to Victor would cost circa $1.5 billion. By the time such a project reached construction, it may well cost $2 billion or more. Then there would need to be a rail line, so let's double it and call it $4 billion all up, for transport infrastructure alone. It's not going to happen.

Planning for Climate Change is imperative given growing awareness of the serious risk of catastrophic climate breakdown. The September 2023 global temperature anomaly stunned climatologists, with the Antarctic ice melt and global sea temperatures hinting at tipping points being reached. Our State Government has correctly identified that we have a climate emergency. Although recognising this, the Discussion Paper does not adequately address the issue.

Ditto, integration of land use planning with public transport and other non-car transport planning is essential if people are to live locally in walkable neighbourhoods.

Population growth is almost certain to be a lot less than modelled in the Paper and the planning assumed necessary may well lead to premature, expensive and unnecessary land re-zonings and acquisitions. Baby boomers moving to apartment style living in inner suburbs and on to aged care will lead to reduced demand for stand-alone housing, as have other shifts in household composition.

What else can the GARP do to contribute to a greener, wilder climate resilient environment?

Stop allowing the destruction of significant trees across greater Adelaide.

Reduce reliance on greenfield development, encourage more medium and higher density living. Multi story developments permit a lower footprint per family and thus the possibility of a lot more trees and vegetation than 'gutter to gutter' housing.

Identify opportunities for large scale habitat restoration and biodiversity regeneration across Greater Adelaide.

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?

Greenfield development severely compromises 'living locally' ambitions, increases inequality and disadvantages communities living further away from services and amenities – and vice versa. A car dependent neighbourhood inflicts great social costs from isolation, as well as from the additional financial costs of car ownership and, until electrification of the local fleet, greenhouse costs of increased emissions.

What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?

Environmental restoration at the scale required to reverse biodiversity loss has the potential to create thousands of jobs, over multiple generations and should be embedded in the plan.

What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?

Build on existing major activity centres to become more polycentric within the current urban footprint, including dispersal of appropriate employment opportunities within that framework.

Demonstration projects of housing styles not normally seen in Adelaide but common overseas, such as medium-rise mixed use development with low impact commercial on the ground floor and apartments above.

What neighbourhood features enhance living and working locally?

Access to public transport and active transport, a walkable neighbourhood that is attractive and easy to navigate, green spaces and tree canopy. Avoiding cul-de-sacs. Higher population densities are a requirement for having adequate services. The provision of office spaces, retail, education, sporting facilities, etc.

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

It can't, unless it has access to the range of facilities and services that make this possible and unless serviced by high-speed, high-frequency public transport, and master-planned. Living locally works best in established suburbs and brownfield sites closer in to the CBD.

What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?

There should be only one satellite city in order to ensure requisite scale for creating the economic and social settings that underpin and sustain a city. Murray Bridge/Tailem Bend are already partially connected to Adelaide (by road but not passenger rail), have the benefit of a river setting and have space to accommodate a substantial population. Victor Harbor/Goolwa have none of these attributes, it would be cost prohibitive to make appropriate transport connections and topography/geography is a serious constraint on ultimate development capacity. Development to the north of Adelaide will simply consume more productive agricultural land.

What do you see as the benefits and potential drawbacks of greenfield development?

The land development industry loves an approach that is familiar and yields good profits. For the homeowner however, any upfront cost advantage is rapidly eroded by financial costs of transport and the personal costs of wasted time, social isolation and disadvantage for all when supporting transport, employment and social services are remote from such development.

As above, further development to the north of Adelaide also continues to consume productive agricultural land.

How can infill development achieve an urban form that is consistent with the principles of Living Locally? What do you see as the benefits and potential drawbacks of infill development?

Infill is essential to increase the population density in areas with services, where living locally is realistic. A particular drawback is loss of open space and tree canopy but with greater planning and careful design this can be ameliorated. Reducing aggregate building footprints (by encouraging multi-story development in appropriate locations) would help preserve green space.

With good planning infill can occur with adequate open space and canopy and is popular and value-adding if it's done well. Master-planning is key to this.

Where is the next generation of strategic infill sites?

Around existing Regional and District Centres, where there is huge potential to live locally in walkable neighbourhoods, if government will lead the way. Along existing rail corridors, where the surface has barely been scratched. In selected areas, in both the western suburbs and middle ring suburbs where current residential densities are very low.

The planning system needs to be ahead of the game in this regard so that the greatest opportunities are not squandered, such as around Marion Regional Centre, where the density of new (ad-hoc infill) residential development in recent years falls well short of what might be achieved through regional master-planning.

What are the most important factors for the Commission to consider in meeting future demand for open space?

Private open space is being lost – a place to grow vegies or a fruit tree or two, an activity which, in turn, is good for the soul. Gutter to gutter housing does not and will not provide open space for such activities which therefore needs to be replicated within each neighbourhood. Not sterile parks but true community spaces where people can come together and get some dirt under their nails.

What are the most important factors for the Commission to consider in reviewing and achieving the Urban Green Cover Target?

Firstly, stop allowing the wholesale destruction of existing canopy for no good reason. Then get serious about increasing canopy cover and set a specific canopy target as Sydney and Melbourne have done (40% by 2040) rather than the current target of a 20% increase.

In a climate challenged world, canopy cover is a de-facto public health issue and should be treated as such.

DTI:PlanSA Submissions

From: GEHA [redacted]
Sent: Monday, 6 November 2023 2:39 PM
To: DTI:PlanSA Submissions
Subject: FW: GARP submission
Attachments: GARP submission final.pdf

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GEHA GARP submission
Thanks

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Greater Adelaide Regional Plan Submission

5 November 2023

South Australian State Planning Commission
Minister for Planning

Gawler Environment and Heritage Association (GEHA) is a community group which supports the natural environment and biodiversity, heritage, appropriate planning and environmentally sustainable living. GEHA has been an active community group since 1980. Our membership of about 90 extends into regional areas around Gawler. Over the last 43 years we have been keen for Gawler and the surrounding region to achieve its potential as a town and region with high quality built and community character. We look forward to some appropriate planning from this review.

As an introduction, we appreciate much of the document in presenting information and considering issues of sustainable planning, climate change, biodiversity conservation, infrastructure etc and inviting comment. The problem with such generalities in the past has been that there has been little effective action to ensure that general goals are achieved. We seem to end up with a lot of developer run initiatives speaking in the relevant language but with outcomes for community and the environment coming a distant second. We hope that the resources and directions are provided for follow-up work that produces high quality results.

A piece of history from 10 years ago

Many of the issues dealt with in the GARP document are not new. We would like to start with an extract from a 2013 submission on the review of the 2010 State 30 year Plan.

> It is clear that in the 3 years since the 30 Year Plan was announced that a lot has changed. Population growth particularly, and economic growth generally, has been slower than predicted and most of the people involved in pushing through the high population growth strategy have moved on or been moved on. It is also clear that

the current State government is adopting a much more measured approach to development, especially new greenfield development. To that extent it is nearer to the views of the Gawler community which supports steady rather than rapid development and recognises that there are many downsides to urban expansion in or adjacent to Gawler.

There are also a number of positive directions in the 30 Year Plan which reflect the wishes of Gawler community. Support for open space and a rural greenbelt separating Gawler and Playford, support for more public open space, conservation and recreation opportunities associated with the river corridors in Gawler Council area, support for heritage protection for historic towns such as Gawler, support for better walking and cycling facilities and support for nodes of higher density development around inner city transport corridors rather than ongoing urban sprawl are some examples.

Population projections.

Repeating our analysis from 2013, the GARP document not dealing with population projections appropriately. Previous reports of this nature and now this one have just picked High ABS population projections and assumed that these are appropriate. We request that the GARP document contain graphs and tables showing the population projections for greater Adelaide by ABS – High Medium and Low at the time of the 2010, 2017 and 2023 versions of the 30 Year Plan, the projections adopted in each Plan and revision and the actual population growth that occurred.
The current draft plan summary contains these statements "**1.0% Average annual population growth in the past 10 years**" and "**How many homes do we need by 2051? We need 300,000 new homes."**

The 300,000 homes is not a "need", it is a projection based on using something like 1.6% annual growth. If the population projection was 1% per annum then the alleged shortfall in housing would be much reduced if not eliminated. Please provide the figures for what is the effect of adopting 1% population growth for next 30 years, or either the low or medium ABS forecasts rather than the arbitrarily chosen "high" level. GEHA does not consider that pumping up population projections is part of good planning. Concentrating on how to produce steady state economies with growth based on quality rather than quantity is essential if our planet is to avoid looming problems associated with global heating, biodiversity loss and related issues.

We are also concerned that the GARP seems to have watered down commitments for more sustainable urban growth based around previously identified. Transit Oriented Development in the more inner Adelaide metro area as well as designated areas nearby at Elizabeth Munno Para and Tambelin. Adelaide does not need more urban sprawl to fulfill many of the

laudable objectives in the GARP for Live Local, and sustainability generally. We do not need to continue turning high value land for food and related production into suburbs. We needed planners and government at all levels to walk the walk not just talk the talk.

Open Space and MOSS extension

We are -pleased to see the renewed focus on Metropolitan Open Space Scheme MOSS. We strongly support an area of designated open space to separate Gawler from other urban development. This can be in the form of Hills Face Zone type policies to protect landscape character and vistas and does not need to involve publicly owned parklands.

We note that previous commitments for a Linear Path along the Gaw2ler River from Gawler to the coast by 2036 have not progressed very far. This commitment should be restated and supported with real programs to achieve. Again, it does not always require public ownership – easement arrangements with private landholders can also assist speed up implementation.

MOSS in the Gawler area has not been properly assessed or developed. It was not updated to cover the expanded metro area many years ago. The whole of the river corridors in Gawler should be included. There is an excellent 2013 report “Gawler Urban Rivers Masterplan” prepared by SMEC and Gawler Council which provides assistance with this. The document is large and can be accessed on Town of Gawler website.

Open space planning also needs to change to a Greater Adelaide focus. A number of years ago there was a ROSS or ROSES plan discussed which covered outer metro areas and in particular had a proposed extension of MOSS planning to include a linear paths along major parts of the North and South Para rivers into the Barossa and hills and inclusion of the northern side of the Gawler River in Light and Adelaide Plains councils. We suggest such proposals be included in the current revised plan.

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Open Space and MOSS extension Buffers Rural Green Belt

There is often a view that a “green belt” should be green all year and that Gawler’s rural green belt cannot achieve that without becoming some sort of urban forest. In our view the rural green belt should be focussed on rural and open space rather than trees. The essence of a buffer between Gawler and Playford is to maintain a non-urban perspective for people entering or leaving Gawler.

Historically the entrances to Gawler had a very open character. Between Gawler and Smithfield and Gawler and Angle Vale was a wide grassland plain with few trees or shrubs. To the near east and north of Gawler were open rolling hills with low density of trees being mainly along creeks and on some higher ground. Only to the north-west near present day

Willaston cemetery and at Gawler Belt and towards Kangaroo Flat was there moderately dense woodland.

Linear planting of trees along Main North Road between the southern end of the Gawler Bypass and Dalkeith Road have damaged the southern rural green belt by blocking views of the Mount Lofty Ranges to the east and across the plains to the redgums along the Gawler River looking west. That is not to say that we need to revert back to a treeless plain – clearly there are benefits in strategic areas of trees for shade, climate modification and assisting with biodiversity. But the essence of long-distance views of the Mount Lofty ranges and across the plains to the redgums along the Gawler River should be maintained and promoted along with the biodiversity associated with this landscape. And during Summer, it is not a problem if much of the buffer area is straw coloured and a bit brown rather than green – that's its historical character.

We would also like to have noted that "canopy cover" which is a very good concept in urban areas for shade, climate adaption and potentially biodiversity seems to have been misapplied in Gawler to include the Rural Zone. It is just not good analysis to say Gawler has low canopy by including the Rural Zone which has a different purpose and character altogether. Gawler urban area is much better than the published figures for Gawler which seem to include include Rural Zone or undeveloped rural land to produce a very poor canopy assessment.

We do not support changing the current area zone Rural for urban development. We consider there are much greater benefits form maintaining active rural activities. Attached as part of this submission is a 2016 report which GEHA supported assessing options for the Rural Zone. We encourage GARP to take a similar approach or at least to provide for a rigorous assessment before any decisions are made to move away from current zoning.

"Inter-urban breaks"

We are also not at all are not impressed with the use of the term "inter urban breaks" in GARP. For the planning system that produced the "inter urban break" between Gawler and expanded Roseworthy – which consists of basically the general area of the Sturt Highway/Horrocks Highway cross-over; and the "Suburban Neighbourhood" zone on the southern side of Dalkeith Road in Playford – we submit that these were failures and not to be repeated. We propose maintaining the current zoned break between Gawler and Playford which provides about a 3.5 kilometre break.

We are interested in looking at options for biodiversity restoration/rewilding on both public and private land in the Rural Zone and river and creek corridors. This might also include some higher-level sport and recreation facilities.

Concordia, Springwood/Gawler East Regional Infrastructure, other issues

GEHA is concerned about the current lack of public information about development proposal for the proposed Concordia urban area. The original planning included a road link from Barossa Valley Way to Sturt Highway on the eastern edge of urban development. Also linking up with the Gawler East Link Road visa the eastern end of what is now Schomburgk Boulevard probably via Kalbeeba Road to remove traffic from existing and proposed urban areas. Combined with a rail spur from Concordia this would minimise traffic impacts on existing urban Gawler.

The current work to provide a major access road along Cheek between Springwood and Concordia will do just the opposite. There also needs to be major work for localised water recycling, including localised sewage treatment to produce usable water for gardens etc and possibly drinking water.

There seems to be a plague of black and dark-coloured roofs in new areas of Gawler. The GARP should have policies which aim to promote if not require light coloured roofs. The energy cost and the impact of higher local temperatures of having black and dark grey coloured roofs has been scientifically documented and shown to be substantial.

Town character and heritage

Gawler has a unique heritage and a community which takes part of its character from the history of the town. Gawler was the State's first established country town in 1839 with a town plan set out by Colonel William Light and Light Finniss & Co. It is vital that planning supports better policies to protect this heritage and character, particularly in the older historic parts of the town, but also in the newer areas and the transition between them.

We owe it to more than 175 years of town history to strive to our utmost to get things right. The needs of the whole community and future generations should rightly take priority to short term interests of a few people who might benefit from a lack of protection for heritage and character.

Water, Sustainability and Climate Change

The current GARP draft has some good general policies on water sensitive urban design etc but there seems to be a lack of results. Consistently new development, both infill and greenfield, seem to increase stormwater runoff. It is essential that GARP spells out clearly Council and developer obligations. Currently it seems that the community pays for most of the upgrading required.

Biodiversity protection in GARP

GARP should support requirement for better biodiversity assessment as part of major new green field development. The failure of the State Government and Council to adequately protect and restore important areas of remnant vegetation in new development areas and generally, is indicative that the process for approvals in the area was inadequate.

Aboriginal Cultural Heritage

We note the words in draft GARP on walking with and working with First Nations people. GEHA considers that there needs to be better resourcing for First Nations groups to effectively participate in planning and the many related issues involved. The current issues at Riverlea provide one example of problems. But equally involvement with forward planning would benefit a lot from effective First Nations involvement. GEHA has been involved in a number of projects involving Kaurna people and we can attest to the benefits of bringing together the experience and expertise available to0 produce mutually beneficial processes and outcomes.

Please note that we have also participated in a submission related to GARP and Gawler and surrounding rural and landscape areas as part of a joint community group submission.

Thank you for the opportunity to comment. We look forward to the results and also being involved in the assessments which will necessarily be required in future years to refine and implement relevant aspects of GARP.

Yours faithfully

Gawler Environment and Heritage Association

Attachment: Gawler Rural Land Use and Infrastructure Investigation [2016] Planning Advisory Services – main report.

Planning Advisory Services
27 / 19th Street, Gawler South SA 5118
Telephone (08) 8522 6999 Facsimile (08) 8522 6126
ABN 30 577 956 623
CFS Building
60 Weymouth Street, Adelaide, South Australia 5000
Telephone (08) 8410 0956

Gawler Rural Land Use and Infrastructure Investigation For Consultation

March 2015

Submission

4th January 2016

Summary

Two non-profit community groups support this submission. Their motivations for commissioning the work are:

- A long term and abiding interest in local planning issues;
- Knowledge relating to previous investigations have been over-looked;
- Concern that there is insufficient emphasis on the Study Area's environmental resources;
- An interest in bringing together the raft of data and information that has been collected over the decades with a concise strategy and way forward.

The groups and their members have a long experience of planning issues in Gawler and wish to provide realistic long term solutions aligned with the consistent expectations of the broader Gawler community.

The summary table that follows represents a pragmatic course that:

- Does not argue with the facts (urban development and its expansion is not an option for the Study Area);
- Sets out a simple but effective land use and zoning framework;
- Acknowledges that economic investment in land and infrastructure will only occur with leadership, in the first instance, by the Council; and
- Draws together the relevant historic commitments that need to influence the outcomes from the current work.

No attempt has been made to critique all the content of the current report. It is necessary to state that the current Council Investigations document is incomplete as to referencing and drawing on previous work and as will be apparent from the content of this submission, including attachments. This comment is not intended to be a criticism of either the Council staff in briefing the Consultants or the Consultants themselves. The main additional documents were prepared some years ago and wholesale changes of Council staff have occurred since.

The main additional relevant previous investigations that have been retrieved from Council's records are attached.

Study Area - The Facts	Response
No potential for urban development within 30 years – State 30 Year Plan A forceful commitment and strategy by the State government to increase SA's food production	Need for a rural land use and investment strategy that has: • a sound economic basis; • attracts strategic public resource and infrastructure assistance; and • uses public assets to attract investment for preferred land use and infrastructure
Agreed and consistently reaffirmed by public stakeholders that the Study Area is a Rural Green Belt	Primary Production Zoning which promotes open (non-industrial) food production and an open rural character between urban Playford and urban areas of Gawler. Design controls to ensure industrial food production does not occur
Pockets of non-rural development exist which cannot be realistically altered	Zoning reflecting current 0.9 ha rural living part of Kudla and established commercial uses (Residential parks, industrial/commercial uses)
The pattern of settlement in the current Gawler Rural Zone contributes to Gawler's character	Maintain larger allotments particularly suitable for primary production and open vistas and low scale development surrounding Main North Road, the railway line and other major thoroughfares like Angle Vale Road, Coventry Road and Dalkeith Road. No reduction in allowable lot sizes in 0.9 ha rural living part of Kudla
Gawler River and its flood plain are an important environmental and recreation resource and a location of risk for development	Zoning which addresses the complex riverine environmental issues, most likely *Metropolitan Open Space* zoning and the 100m from the centre of Gawler River zone in Playford Development Plan
Economic rural production is viable with water reuse schemes such as expansion of Bolivar water or other recycling schemes. Maintaining low scale non-irrigated primary production activities such as grazing or cropping is appropriate to maintain the amenity and character of the rural land.	Investigate methods for expansion of Bolivar reuse water to the East and West of Main North Road and other potential water recycling schemes. Investigate opportunities for promoting high-value rural activities, including through cooperative activities of landholders.
Government Land (Renewal SA + Council) is sufficient in size to be packaged to attract investment in food production and underpin the cost of water infrastructure expansion	Council initiate governments working together to create a rural land and investment package

1. Submission proponents

This submission is on behalf of Gawler Environment & Heritage Association Inc and Gawler Region Community Forum Inc.

Both are non-profit community organisations with their purposes including promoting the character and amenity of Gawler and promotion of sustainable communities and development in the region.

2. New Information

Through their longstanding interest in Gawler and its development issues, the organisations are aware of previous and relevant studies that were undertaken by Gawler Council but have not been referenced in the 2015 Investigations report.

Their need to access relevant older Council documents has taken some time, hence the delay in lodging this submission.

One critical document was the Southern Rural Gawler Development Framework 2008 which I helped prepare in my previous planning role with Gawler Council.

The organisations agree following their review of the previous Council documents that much of the previous work and recommendations are worthy of consideration by the Council at this time.

This submission draws on the work up to 2008 and puts it in a contemporary context.

The Study Areas are the same.

3. Planning Context and recent History

The Rural polices and spatial context are largely unchanged since 1985 when Gawler Council was increased in size by adding land from the City of Munno Para (now Playford).

Changes that have occurred since 1985 include:

1. Two General Industry Zones which started off the non-rural activities at Tiver and Hayles Roads' junctions with Main North Road were deleted by Gawler Council and are now part of the Rural Zone.

2. The extent of urban development was agreed by the State government and Council in 2002 (and revised in 2006) and is now reflected in the town's Development Plan. This agreement was premised on the concept of guaranteeing the Gawler community a rural green belt substantially larger than the minimal scheme of one mile wide that was conceived in the late 1960s.

3. Kudla defacto rural living area which has been in existence prior to planning controls, was reviewed in 2006 with a spatial extent of about 340 ha defined in the Gawler Development Plan with clear boundaries.

4. The extent of the Gawler River floodplain, and flood risk and open space opportunity was defined in 2007.

It has been again recently confirmed by the State Government through the State 30 Year Plan that the Study Area is not required for urban purposes for at least 30 years and should remain as rural land.

4 . Study Area Profile at 2008

Not much has changed over the last seven years apart from some land division development activity in the 0.9 ha Kudla area.

Key facts:

- A study area of 1290 Ha, with 26.7% or 345 ha located in Kudla
- 57% of land is involves forms of rural residential use, concentrated in Kudla
- a large holding of 200 Ha is used for dry land farming and is in single ownership by the State government

Spatially, the Study Area falls into seven logical areas:

1. East of Conventry Road (apart from Kudla 0.9 ha area):

- concentration of larger lots (10 ha +)
- concentration of largest lots (c30 ha) ;
- majority of this area is suitable for horticultural production with supplementary water
- includes land adjacent Smith Road (apart from Cemetery) in public ownership which has been developed as native vegetation open space as part of the original MOSS scheme (similar land in Playford Council south of Smith Road and Dalkeith Road is zoned MOSS). Zoning this land in Gawler as MOSS or similar is appropriate.

2. West and north of Coventry Road (apart from Kudla 0.9 ha area):

- generally c4 ha lots
- higher concentration of residential use
- activities include horse keeping and horticulture
- suitability for horticulture is stronger due to access and proximity to Bolivar water and some groundwater, but limited by the distribution and concentration of smaller lots and residential use

3. Gawler River and its Flood Plain:

- an environmental and recreation asset
- a location of risk to development

4. Kudla 0.9 ha area:

- mainly an established rural residential character
- limited infrastructure for residential use (particularly water but other services generally)

5. Eastern Junctions of Tiver and Hayles Roads with Main North Road:

- two pockets of industrial and service uses

6. Two Residential Home (including Caravan) Parks:

- at Main North Road and Hillier Road

7. A Regional Cemetery

- **At Smith Road**

Allotment Sizes and Landholding Size:

Fragmentation of land holdings can severely discourage investment and expansion of infrastructure .

The Study area has a substantial advantage in this regard as *Renewal SA* controls over 200 Ha (13% +) of the study area . This represents a critical mass that has the potential to lead investment in water infrastructure expansion.

5. The Study Area's Primary Production potential?

This question was considered by highly regarded consultants Scholfield Robinson in September 2000 (report attached).

The climate and soils, apart from dry land cropping and sheep, suit almonds, grapes, olives shallow rooted vegetables and lucerne. Supplementary water is the primary limitation on these crops. Other general horticulture including other nut trees, nurseries and flower production is also practiced currently on the northern Adelaide plains or has potential.

A key feature of recent thinking about primary production in areas close to Adelaide is sale of food products, especially more specialised food, rather than raw commodities. This has driven the growth of specialist farmers markets and direct selling from the producers resulting in much higher margins. Organic production is a similar high value opportunity that can suit smaller scale production.

6. Design

The 2008 investigations did not specifically address development character and design, which is currently an issue in the context of :

- pressure from some Kudla residents for higher density residential development or expansion of the 0.9 ha area; and
- an emerging trend for agricultural production using industrial buildings, and at a scale not previously envisaged.

Context

The award winning Northern Gateway Study 1992 articulated the essential character of the Adelaide plains in the Gawler locality.

A critical feature of that character is and remains long distance views in either direction from Main North Road, the rail line and some other major roads between Gawler and Playford including Angle Vale Road. These give open views of the distant horizons: the Mount Lofty Ranges to the east and Gawler River and its corridor of tall redgums towards the west.

They are vistas that are define Gawler’s essential character as a separate historic town on the northern fringe of the Adelaide metropolitan area, and

provide it with a point of difference which has evaporated over time to the south of Gawler Council area.

The new development at Munno Para and Smithfield south of the *Elephant House* demonstrates how any appreciation of travel and place has been sanitised through conventional layouts of urban development.

Of note this is an outcome that has been avoided in Gawler's new Southern Urban areas (based on the Open Space Zone and Northern Gateway Study principles).

Kudla 0.9 ha Rural Living Area

Any increase in density allowed for residential use in the 0.9 ha rural living area Kudla, apart from the considerable infrastructure implications on the Council (roads, drainage and community facilities), would have the effect of infilling existing open spaces, gaps and views.

This outcome would produce a denser spread of buildings, old and new, and likely reduce the overall visual quality as well as the open character of the area.

It might be said that Kudla's character pattern of development is somewhat haphazard, but the redeeming feature, like much of other parts of Gawler, is that historically and in other ways Kudla and its unique spatial pattern and settlement is part of Gawler's difference compared to other places on the Adelaide Plains.Celebrating difference is an important part of Gawler's character.

Changes, through increasing residential development opportunities would obliterate the spatial relief that comes from a low density, and deliver a change in Kudla and Gawler's character to produce an urban style, importantly also with the consequential much increased demand for services to match.

Successful rural living areas in South Australia generally have a minimum lot size of about 1 hectare (the areas in Mallala Council at Lewiston and Two Wells being good local examples). Experience with smaller lot sizes shows that development tends to see relatively little differentiation between lots with houses, sheds and taller landscaping dominating and very limited open vistas. Given the large area involved at Kudla, the potential expansion of population is significant and the demand for upgraded infrastructure and it cost would be significant.

Changes which could be appropriate in Kudla 0.9 ha rural living area include:

- Specific policies/rules to reduce dust nuisance for properties, particular associated with horse keeping, by providing for maximum stocking densities,
- Encouraging low scale landscaping consistent with the original pre-settlement character of the area as mainly open native grassland, and with maintaining vistas;
- More detailed requirements related to block layout beyond the current sole requirement for road frontage of lots to be at least 25% of the depth of blocks; and
- More detailed character guidelines including setbacks related to residential and other buildings

Rural Development

The Study Area's agricultural potential in 2008 was premised on open paddock production compared to use of buildings for industrial agricultural production (particularly some massive glasshouse factories) of the type that is emerging in parts in the Adelaide Plains. Any encouragement of new forms of food production, with consequential character changes from dry land to irrigated crops should not also include industrial scale buildings, other than those essential to manage farmland like machinery shedding,

which can work well in the landscape with appropriate design controls (scale, setbacks and colours).

With the State Government and community push to protect rural land and primary production activity, it is important that Gawler's rural land is recognized as having significant potential for primary production. Being close to markets and having the potential for specialist high-value food production means that nothing should be done to diminish the potential for this now or in the future.

Proximity of urban centres can be a bonus for farm production as demonstrated in Europe and other places. What is required is a range of policies (including taxation) which promote and protect farm activities and encourage the investment required for innovative solutions to be put in place. In the meantime, there is little disadvantage to maintaining low level rural activities in Gawler's rural lands where more commercial production is not desired or practical for current landowners. Apart from some examples of poor land management causing issues with dust and some amenity issues, the current rural land use reflects the pride and commitment of landholders to maintain the rural character of the land surrounding Gawler's urban centre.

Promotion of sustainable land practices by Council (including through the Development Plan) and State agencies such as the Adelaide and Mount Lofty Ranges Natural Resources Management Board can assist this.

[redacted]

Yours Faithfully

Michael Wohlstadt, CPP, MPIA CPP CERTIFIED PRACTISING PLANNER

Attached: Scholfield Robinson, September 2000

Southern Rural Gawler Development Framework, Town of Gawler 2008

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 4:48 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Comments-on-Restoration-of-Gawler-River-for-GARP.pdf; Gawler-River-Some-Known-Restoration-Areas.pdf; bebfcc976db289a9e06ccbb40d3ffa41ae5ea304.pdf; Joint-Submission-to-the-GARP-Gawler-Environmental-Groups.pdf; Some-Growers-from-Gawler-Rural-area.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	graham
Family name:	brookman
Organisation:	Gawler River Riparian Restoration
Email address:	[redacted]
Phone number:	[redacted]
Comments:	The summary document is 'Joint Submission to the GARP - Gawler Environmental Groups'. The first four files represent the submission. The rest are attachments relevant to the issues raised cheers Graham Brookman [redacted]
Attachment 1:	Comments-on-Restoration-of-Gawler-River-for-GARP.pdf, type application/pdf, 650.9 KB
Attachment 2:	Gawler-River-Some-Known-Restoration-Areas.pdf, type application/pdf, 758.2 KB
Attachment 3:	bebfcc976db289a9e06ccbb40d3ffa41ae5ea304.pdf, type application/pdf, 670.3 KB
Attachment 4:	Joint-Submission-to-the-GARP-Gawler-Environmental-Groups.pdf, type application/pdf, 694.1 KB
Attachment 5:	Some-Growers-from-Gawler-Rural-area.pdf, type application/pdf, 172.6 KB
Sent to proponent email:	plansasubmissions@sa.gov.au

Submission on the Greater Adelaide Regional Plan

By: Gawler River Riparian Restoration, Gawler Environment Centre, The Food Forest

Comments on the proposal for restoration of the Gawler River as part of the GARP

To: South Australian State Planning Commission, Minister for Planning

Date: 6 Nov 2023

BACKGROUND

'The Gawler River is a vital State asset which permanently provides biodiversity, clean water, climate change amelioration, recreation, natural, cultural and built heritage preservation,….. Its corridor should managed to ameliorate flooding and bushfire risk, contribute to community physical and mental health, contribute to education, tourism, employment, active transport and food production.

The statement suggested in the Gawler River Open Space Strategy (2009) was:

The Gawler River will be an attractive and functional regional recreational and environmental asset where: - Resources are managed efficiently; - Recreational access along the river is maximised; and - The river and riparian land is rehabilitated

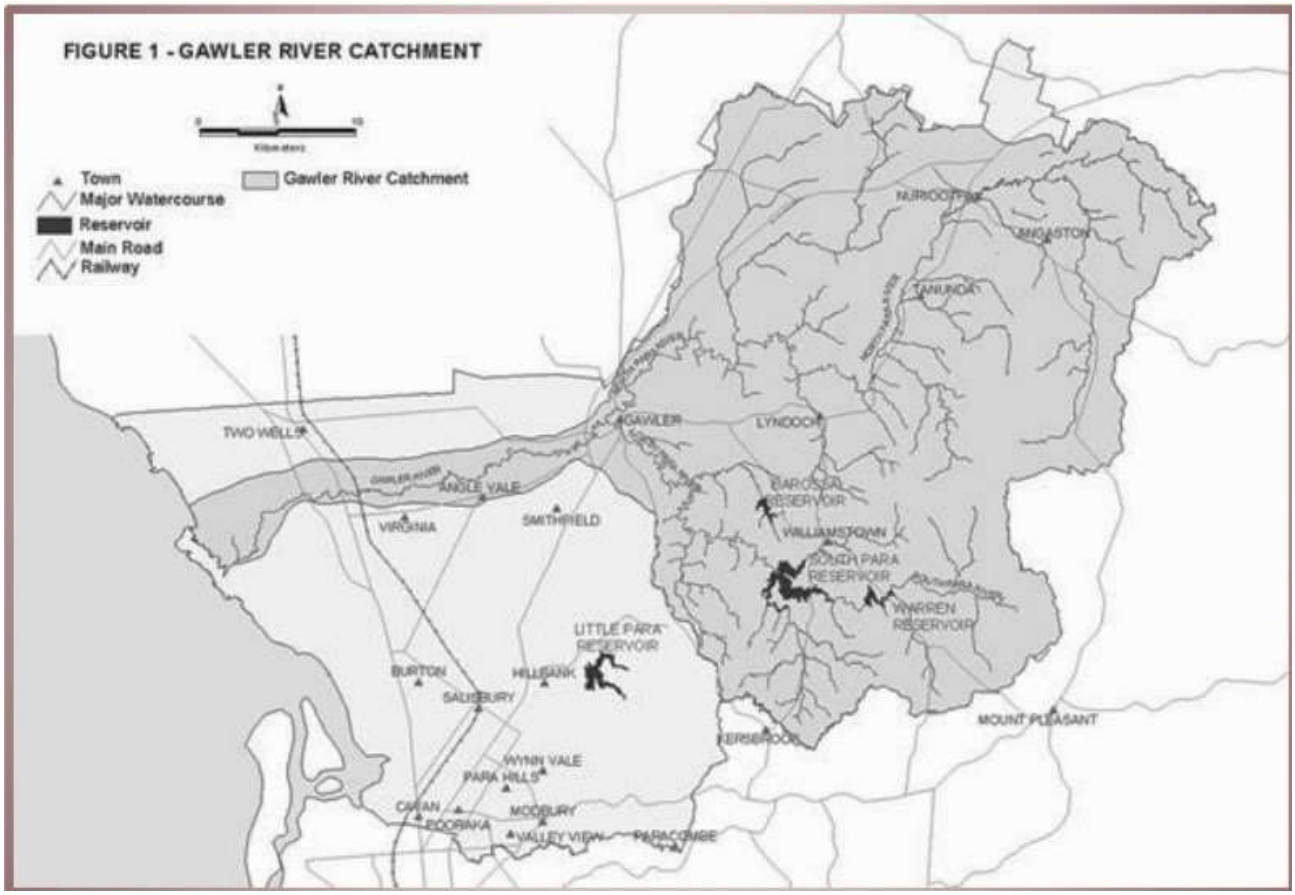
It is now more than 20 years since the *2036 Parklands Strategy* went to Cabinet (APPENDIX 1) and 14 years since the excellent MOSS-based *Gawler River Open Space Strategy* was completed, along with the work done in contacting landholders to assess the practicalities of creating a Gawler to Sea Trail along the river. These documents and the extensive survey, mapping and policy development work have extremely important information about the river for the purposes of river restoration, flood planning and bushfire management

The Councils along the River, community groups and Landscape Boards are using these words more and more - WILDER, GREENER, CONSERVATION & PROTECTION, BIODIVERSITY, EMPLOYMENT, CLIMATE RESILIENT, EDUCATIONAL, REGENERATIVE, CULTURE, WALKABILITY & ACTIVE TRAVEL, OPEN SPACE, RECREATION, LEARNING, ARTS, PRESERVATION OF INDIGENOUS SPECIES, RESILIENCE, PRODUCTIVITY, DIVERSITY AND INTEGRATION, WELL-BEING, EGALITARIANISM, FOOD AND WATER SECURITY, CARING FOR COMMUNITY





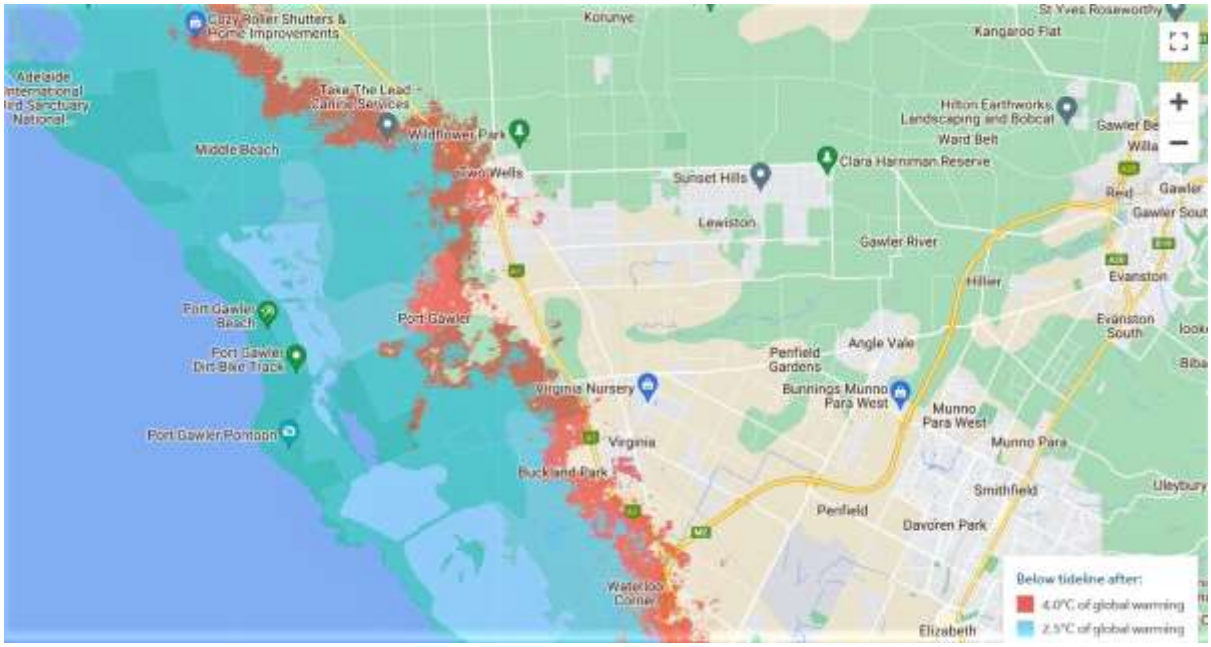
It is time to get serious about a long job that will pay big dividends for the community, agriculture and the environment



The Gawler River is one of the main streams crossing the Adelaide Plain, rising in a rural catchment of over 1100 square kilometres, flowing through Adelaide and ending at the Adelaide International Bird Sanctuary National Park on Gulf St Vincent. The River carries some 15 gigalitres of water in high-flow years and has flooded on average every 10 years over the past 160 years, causing hundreds of millions of dollars worth of damage, particularly to the township and intensive horticultural area of Virginia, which is rapidly growing as a suburban area.



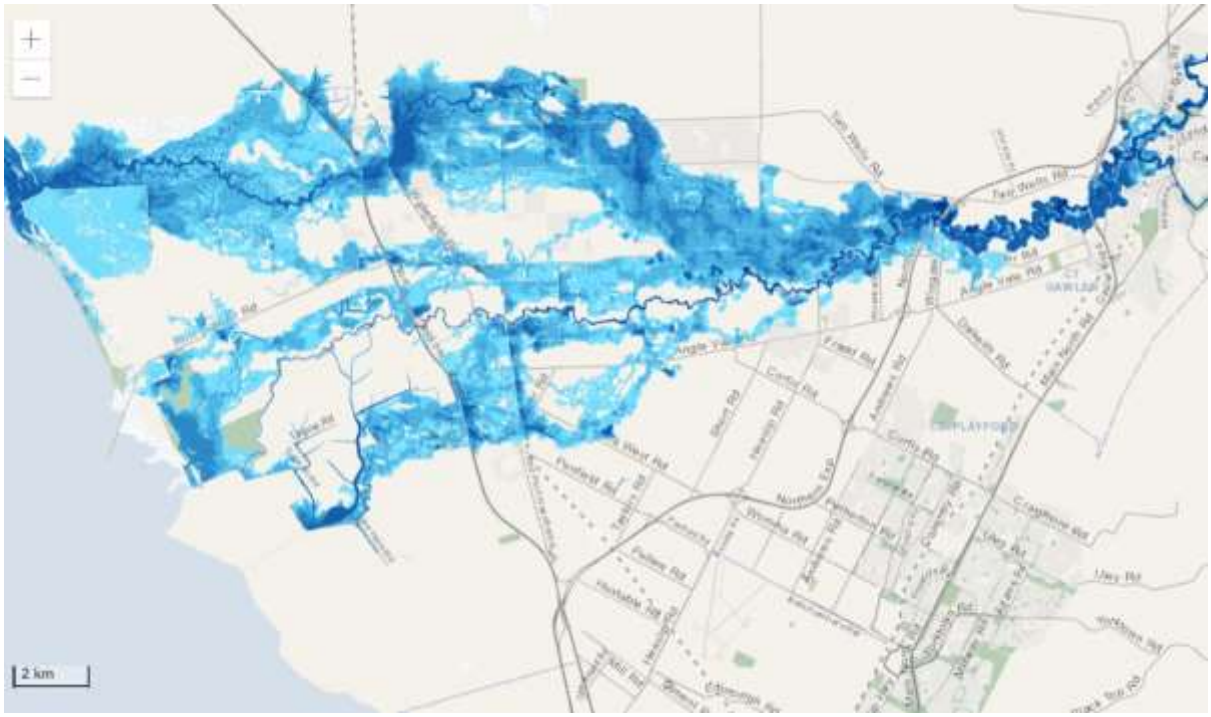
With major rainfall events it is sometimes necessary to release large amounts of water from the reservoirs in the South Para catchment and whilst there is a flood mitigation structure on the North Para, flooding still occurs across the Gawler River Flood Plain, particularly from Virginia to the sea. Predicted sea level rises in the medium term, combined with flooding would cause regular and more severe damage and void the usefulness of the current levee system in Virginia. Below is a map of sea levels in 2100 assuming 2.5 and 4 degree global warming (drawn from the Climate Council website).



Whilst sea level rise has been minor to date, (and there is already a sea-wall at St Kilda Beach) the effects (over hundreds of years) of more sea water and at a higher temperature will raise sea levels by 2.3 meters for each degree Celsius that global temperatures increase, and they will remain high for centuries to come. For instance If global warming was limited to 1.5 degrees, which is Australia's current situation, sea level rise probably vary between 0.9 and 2.4 metres over time. With 2.5 degrees of warming far more likely, the meeting of a flooding Gawler River in its current channel and a high tide would be increasingly catastrophic for Virginia and Buckland Park.

Two projects have been proposed (and costed) to ameliorate flooding, particularly as urban subdivision and intensive protected horticulture are expanding along the river. Both the raising of the

North Para flood mitigation structure and the construction of a Northern Floodway, which would divert excessive flows around the Virginia area have merit. The Northern Floodway would protect most of the developed land currently experiencing flooding on a regular basis (however Climate Change may clearly generate more challenging floods in the future and a study by the school of Civil Engineering at the University of Adelaide (Integrated assessment of flood mitigation options) laid-out a rationale for proceeding such infrastructure work. It would seem that the floodway would be a logical first step in protecting the growing communities around Virginia. Below is a map of the 200ari flood extent drawn from the 2015 calculations.



With climate change extreme weather events are increasingly common, as demonstrated in the 2021 floods in Toowoomba and other areas of eastern Australia. Rainfall intensities are becoming more extreme as higher volumes of water are airborne as a result of global warming. Three-day totals exceeded 200 mm over most of the area bounded by Brisbane, Gympie and Toowoomba and parts of the Northern Tablelands. The highest daily totals observed in the Met Bureau's regular network were almost 300mm while the highest three-day totals were 650mm. Reference http://www.floodcommission.qld.gov.au/__data/assets/pdf_file/0017/5165/ICA-Nature-and-Causes-of-Flooding-in-Toowoomba,-10-Jan-2011.pdf . Similar flooding events have occurred around the World and to assume that our catchments are immune from flooding rains would be naïve.

Looking at the upstream option of raising the Bruce Eastick Flood Mitigation structure, (which has very nearly overtopped in a past flood and would have overtopped in historic floods); it would ameliorate flooding in Gawler and Angle Vale and could help the general situation of Virginia (though the Northern Floodway would still be required, though perhaps slightly reduced in capacity?). An extension of the detention basin would deny the use of very valuable land for perennial crops and reduce its use for annual crops and grazing.

Avoiding urbanisation in low lying and flood-prone areas is the most cost effective way of avoiding or reducing future flood costs. In planning, it would also be prudent to use far higher rainfall assumptions than those currently in the public domain, thus extending the planned reach of floods and so, driving development restrictions through the planning Code.





The levee system, particularly in and around Virginia needs to be integrated into the macro flood mitigation plan so that it does not become stranded asset. The internal drainage system of Virginia needs to be addressed such that its own storm/waster water can be effectively exported either in flood or significant rain event. The inevitable escalation of storm water from the urbanisation of Virginia is part of that scenario



The approach taken to flood management will have an important effect on the restoration of the river as it will determine what land would be included in the flood zone and where infrastructure would be placed. So the flood plan should be addressed first.

Opportunities for restoration

Once the nominal flood regimes are adopted it would be worth flying the course of the river with a drone fitted with simultaneous video/image capture, topo, and GPS reporting so that key stakeholders can identify opportunities and challenges in terms of the management and challenges,

particularly including ownership, access, trails, river crossings, parking areas, amenities and restoration of the river ecosystem.

Water quality

The river is formed by the confluence of the North and South Para rivers in Gawler and water quality has been degraded through land clearance, leading to intrusion of highly saline water in the North Para catchment (leading to some North Para flows above 5000ppm TDS), **which makes the water of the Gawler River unsuitable for much aquatic life and for irrigation**, whilst the South Para catchment feeds into the Barossa, Warren and South Para reservoirs before flowing to Gawler. Its water is of excellent quality and the catchment has been managed in an attempt to maintain aquatic life as far as Gawler using environmental flows released from the South Para reservoir.



If the quality of river flows was to be increased a scheme to ameliorate saline inflows including dryland salting of the North Para would need to be investigated and implemented.

Other quality issues relate to BOD, agricultural fertilsers and biocides and urban rubbish.

Loam Mining and both buried and floating rubbish

The tradition of mining the Gawler River loam deposits immediately next to the channel, then filling the excavation with urban waste, continues within a policy environment in which the owners of the land, (often right to the centre of the river channel) can do what they wish, and physical and fly-over access is denied to regulators. In a case that has been brought to the attention of the Ministers of Mining, Environment and Planning it was pointed out that there is no requirement for rehabilitation of loam pits after mining operations have ceased and there is no effective no regulation of how the pits are run. In this case the river banks had been perforated , effectively changing the course of the river and large native trees were destroyed. No reply to the issues raised was received from any Minister. **This situation must change if there is to be effective rehabilitation of the river.**



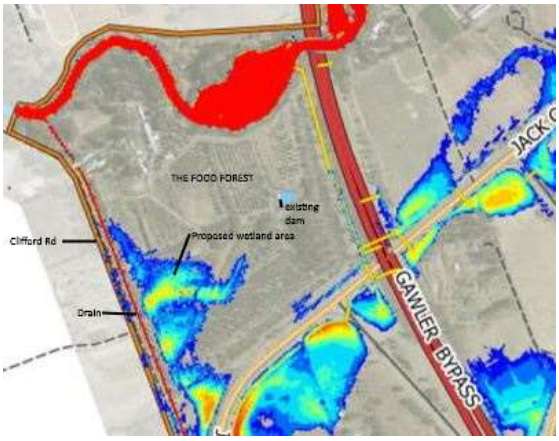
The responsibility for rubbish removal from the river is a vexed issue. Over 1000 tyres were removed from one precinct of the river subject to restoration by the community group GRRR and the particular case a Council bore the cost of recycling, but only as an act of goodwill. The Council on the other bank had no interest in removing or paying for rubbish removal.

Stormwater inflow

In general the use of trash racks, wetlands and WSUD has been poor but Gawler Council recently agreed to the diversion of some water from one of its main drains to a an adjoining property for treatment through a wetland and use for aquifer recharge and irrigation. Policies like this should be implemented in all new urban developments or significant redevelopments.

Poorly managed silt and contaminant loads are capable of quite quickly killing much of the aquatic biota in the channel, undoing years of rehabilitation work in days.





RESTORATION

The linking of the expanded river corridor with the proposed overall design to increase biodiversity including a significant range of biota beneficial to nearby intensive agriculture should guide the selection of species chosen to repopulate the restoration areas as well as planning appropriate wetlands. Discussions have been held with industry, research and development organisations to conceptualise and monitor/develop a sustainable and holistic system that encourages far more IPM in agriculture and horticulture along the river and reduces the use of toxins .



A comprehensive salt budget for the agricultural areas should be undertaken that considers the salt imported from Bolivar (and including 'waste' from hydroponic systems) and its fate. The state and salinity trends of shallow groundwater and options for the supply more and better quality water for sustainable long term irrigated food production both in soil and hydroponic systems. Given that the GARP involves a thirty year horizon, the inevitable change in climate and sea level need to be considered. (note that the paper **'**Assessment of salinity risks to the groundwater resources of the Northern Adelaide Plains and Central Adelaide PWAs' essentially concerns the deep aquifers that are used for irrigation which is a separate issue)





A WILDER, GREENER AND MORE ACCESSIBLE RIVER CORRIDOR

- The goals of effective biodiversity restoration and management, bushfire amelioration in a drier and saltier future can be facilitated by recognised 'River Carers' (or similar) who would be expert staff and contractors with an understanding of ecology, riparian management and access to specialised equipment, who work with landholders to establish and maintain diverse plant, invertebrate and fauna communities, rather than relying solely on conventional Council staff and contractors. The 'River carers' would be required to have an understanding of the overall Restoration project and protocols for its development and management, whatever organisation they are working for.

- Policies such as bushfire management need to be developed in conjunction with the CFS but should include:
  **Revegetation design and plant species choice*
  **Maintenance regimes to reduce fuel loads*
  **Appropriate fire breaks and other management techniques between the river corridor and adjacent properties*
  **The provision of appropriate access and water supplies for fire fighting vehicles and use of water bombers.*

Lessons should be learned from the Expressway Fire that crossed the river at Hillier and was luckily controlled before it entered the suburbs



- Issues such as removal of excessive nutrients from the river environment through removal of biomass rather than continuous non-selective herbicide use or mulch-mowing, cool burning-off, and establishment of preponderantly indigenous fire-retardant species will be useful strategies
- Specialised equipment for operating on slopes, and in tight spaces will be required to avoid accidents and the accidental destruction of understorey plantings which is common in Council landscape maintenance. Excellent machines with manoeuvrable mowing heads and small-scale mulching units with low centre of gravity collection trailers will help.
- Strategic utility areas with services will need to be located along the river
- The landscape-sensitive creation of a comprehensive network of education-rich trails needs to be systematically established. It must provide both river-carers and other users access for walking, cycling and maintenance activities.
- Strategic land acquisition, Right of Way agreements and some low-level bridges & boardwalks will be required.




- Flood resilience must pervade all landscape designing, infrastructure and maintenance
- At first blush it would seem that the councils along the river would be unable to do the heavy lifting when it comes to infrastructure and large pest plant removal. In the case of Gawler's big Urban Rivers project which involved the building of trails, low level bridges, interpretive signage etc, the much of the funding came from the State. In the relatively modest revegetation precincts just downstream of the Gawler Bypass Bridge, at Lewiston and at Bakers Road, the bulk of funds came from AMLR NRMB and in the case of the Hillier fireground funds were largely through the Stormwater Management Authority. That said, Gawler Council has made crucial input to all of the projects in its area. Light Council has facilitated work at Bakers Rd and below the Bypass Bridge and NYLandscape Board continues to provide small grants to keep the project going.
- Ideally an onsite River Education/interpretation Centre should be established to introduce the public to the river and to the role of water in our State (including SA Water, DEW, AGD (Aboriginal affairs), EPA, SA Museum, PIRSA, the big composters. Perhaps DEW was funded to run it, a more global project could be pitched to the Federal Govt as part of a regional development initiative. (There is a pool of funds to support regional activites and river restoration and community building are on the list). The centre would be linked with SA trail networks, would have an active schools educational role and could include appropriate catering and retailing of local products such as wine, bush tucker, fruit and veg, unique grain products, flowers, souvenirs etc. Clearly the site would have to carefully chosen from the perspective of flooding, but it should enable visitation in all but severe flood events, and give access into the river bed.
- Many schools and organisations have 'community service' days and could be involved with river restoration through 'adopting a billabong' or simply helping with planting, seed collecting or whatever activities *river carers* or other staff have available.
- The continued involvement of volunteer groups should be encouraged and expanded

- There are useful documents like the Gawler Biodiversity Management Plan along with action plans, plant lists, costing templates etc

Graham Brookman

Coordinator GRRR

[redacted]

Submission on the Greater Adelaide Regional Plan

By: Gawler River Riparian Restoration, Gawler Environment Centre, The Food Forest

Gawler River - some known Restoration Areas

To: South Australian State Planning Commission, Minister for Planning

Date: 6 Nov 2023

GRRR is a community group that has talented and energetic volunteers who have developed efficient working systems and excellent comraderie. With highly qualified biologists and experienced revegetation contactors on the team, everyone is learning new skills as well as repairing our river. We offer some comments on some of the restoration work that has been done in view of the upcoming GARP review.

To complement existing council land along the river, extra public land has been created via purchase/land bank as well as lots arising from land division, however serious work needs to be done to make dreams of a public river corridor a reality.

Much of the restoration work done in the last 25 years has been on private land in collaborations with DEW and councils, but rights of way and access need to be formalised in order to create walking paths which open up public knowledge and interest in the river corridors and their biodiversity and amenity significance. Legislation exists to that end.

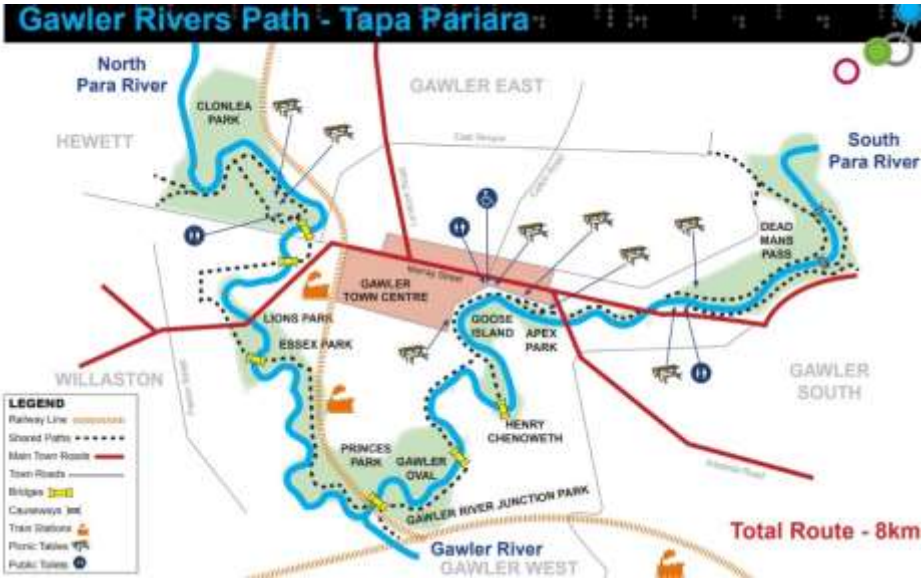
Gawler Environment and Heritage Association (GEHA) has compiled a major database related to native plants, weeds, and native fauna across a region of the northern Adelaide Plains and the foothills from Salisbury to the Barossa and Kapunda. This has assisted major projects such as along the rivers, the Gawler East Link Road, the Gawler Urban Rivers Masterplan 2013 and the Gawler Biodiversity Management Plan 2019. It also includes all the areas related to open space discussed above including Gawler Rural Zone, remnant vegetation on private and public lands and the road reserves in Gawler and nearby Playford, Light, Adelaide Plains and Barossa councils.

Trails

The Parridla Taikondi (river junction) and Tapa Pariara (rivers path) projects in Gawler that have been community, Council and State-backed projects changing kilometres of inaccessible and unwelcoming areas of river corridors into highly used and valued community assets through the building of trails and seven low-level bridges, as well as improving biodiversity through elimination of pest plants and revegetation. There is video footage of some of this work in the video 'Repairing our rivers' made by Gawler River Riparian Restoration (GRRR). .







the Stuart O'Grady trail from Port Adelaide to Gawler and the trail (unrecognised at the time of writing this review on the map of Trails SA or WalkingSA) from the O'Grady Trail via Paternoster Rd, Chignell Ct and the Reid Reserve to River Junction Park (Parridla Taikondi), where it joins the Gawler River trail to Gawler Post Office or Central Station, from which it would/could articulate with the Barossa Trail .





O'Grady trail enters from left

Trail from Reid joins the River trail at River Junction

The road route into Gawler from the O'Grady trail (up Ryde St) could also be offered to cyclists but the northern verge of the road is less than friendly to cyclists, with potholes etc.



WalkingSA map showing extent of Barossa connection (short of Concordia)



Note that Gawler trails are not linked to O'Grady or Barossa on many maps



This is a map used by the Uncool Cycling Club [The Gawler Rivers Trail - The Uncool Cycling Club]

Gawler Rivers Trail map of the not so steep sections of the trail – courtesy of Strava

Outside the township of Gawler, many other projects have been supported by the NRM Board/Landscape Board including significant work in containing erosion and undertaking pest plant control and revegetation. The work of the Gawler River Restoration Group (GRRR) targets the river below the Gawler Bypass Bridge and it virtually articulates with the O'Grady Trail through simple signage leading from the trail to Roediger Rd, Buchfelde where a public park is being established on land owned by Light Regional Council and private landowners.



Roediger Park , Buchfelde - an example of a Private-Public partnership to give pubic access to the river

The restoration precinct west of the Gawler Bypass Bridge could also be linked to the O'Grady Trail through simple signage leading from the trail to Roediger Rd, Buchfelde where a public park is being established on land owned by Light Regional Council and private landowners.

The Hillier - Buchfelde precinct

The river corridor below the Bypass Bridge (in green) was identified in the Gawler River Open Space Strategy as an environmental hot spot, probably because of the outfall of the big Clifford Rd Drain into the channel, access possibilities and prior public ownership of the Murray Hillier Reserve (marked as Pony Club). Land owners, including both councils, either side of the river have participated in pest plant control and revegetation for more than a decade, with the support of NRM/Landscape Boards	



The precinct currently extends from the Gawler Bypass bridge to the Gawler River Pony Club (Murray Hillier reserve) and the adjacent Riverdell and includes a Clifftop walk of native grasses including Aristida, dryland Adelaide Plain (potentially)woodland section, Red Gum floodways with lignum patches and Carex sedges, the incised channel, 'shoulder' plant communities including various saltbush species, Acacia salicina, Native Apricot, various grasses. There are also frequently inundated ponds and ephemeral areas. Some 60 indigenous plant species are involved in the ecosystem as well as the inevitable pest plant burden resulting from upstream infestations. The transformation of the site from a pest-plant-infested disused loam mine and rubbish dump is documented in the video 'Repairing our rivers'. Over a thousand tyres have been removed and recycled and dangerous pits reprofiled.

In 2010 a significant repair was undertaken adjacent to a log-jam in the channel that redirected the river, undermining and carrying away some 1500 tonnes of the south bank. Gawler Council managed the repair with shared financing between AMLNRMB and the affected property owner. The project has provided a design template and palette of plant species for similar work in stabilising and revegetating damaged banks since.








Significant areas of the floodways at Buchfelde provide at-level access to the river flow, making it a wonderful site for water-play and citizen science. There is also a small publicly owned park with excellent access from the end of Roediger Rd, with potential for a parking area . The Precinct is an important link in the Metropolitan Open Space System, part of the proposed Gawler-to-Sea bike/hike trail and can easily be linked to the major bike trail (Stuart O'Grady bikeway) from Adelaide to Gawler, which in-turn links to the Barossa Bikeway. It also provides access to the river corridor for rapidly-growing urban populations north and south of the Gawler River and incorporates the Gawler River Pony Club. It is close to the location of the expanding Sports Park at Karbeethan Reserve.

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The presence of Rakali, a range of native fish and amphibians and macroinvertebrates is supported by the ponds recharged by stormwater flows from the Clifford Rd Drain, has made the current biodiversity in the precinct unusually

rich, and valued by nature photographers like Martin Smith, who took most of the following photographs. Martin has made available a collection his photos to Council. It would be good to have the naming of the pix verified by a DEW ecologist/ornithologist. They are relatively recent pix, most of which were taken at the abandoned Clifford Rd loam pit. The pit has been sold and is currently being transformed into a private residential property with large amounts of activity involving heavy machinery. It may be possible to gain access to do thorough ecological survey work and the new owners would have presented some ecological information to Council in their development application. I can provide contact details…equally Council would already have them as part of the DA.

I attach an old fauna list from Riverside (opposite The Food Forest), and bird list from The Food Forest which has been assembled over the last 20 years or so. Some of the species would not have been seen in the last 5 years. The Food Forest would give access to a similar part of the river but does not have the scale of the ephemeral lagoons of the loam pit (no problems about access). *Photos below by Martin Smith and Colin Cock (the Rakali)*









GRRR hopes to be invited to assist with river restoration on 3 contiguous properties downstream in the next 12 months as a result of changes of ownership and land developments, potentially swelling the precinct to over 2.5 kilometres and incorporating significant wetland areas.

Hillier fireground

3 years ago the Northern Expressway/Hillier bushfire burned through the river N-S, leaving an extremely erosion-prone area over an area of almost half a kilometre, taking in part of lot 66 and the area downstream. Underground fires in the roots of Red gums continued to burn for more than a year. With financial assistance from the Stormwater Management Authority, tree maintenance was carried out to remove dead or 'at risk' branches at risk of falling into the river and causing downstream blockage. Revegetation and maintenance Revegetation was undertaken to promote local biodiversity and improve riverbank stability from May – October 2022. These works included hydroseeding and landscape planting of tubestock along the riverbank including 22 different native species and involving thousands of individual plants over 12,850m2. The Town of Gawler has committed additional funds to ongoing revegetation and remediation in 2023-2024. I believe some 8000 plants have been established to date.



The Hillier bushfire ground adjacent to Hillier Park. A close shave for 400 residents and significant damage to the river ecosystem – now repaired

Lots 52 and 66 Hillier Rd

This land is the subject of development and code amendment applications that would transform an old poultry farm into a residential village for 'over 50s'. It has significant flood flats and the owner (Martin Banham) has previously undertaken minor restoration work with Landscape Board help.

Hillier Park trails

It is understood that a river trail may be constructed in association with the proposed development of Lots 52 and 66 which would harmonise with the Town of Gawler Open Space, Sport and Recreation Plan 2025, which highlights Council's ambition to participate in the development of a riparian linear park from Gawler to the coast. The related map shows a public connection route between the River and Karbeethan Recreation Reserve which runs through the subject land.

Walking is the highest participation activity for people aged 15 years and over and this highlights the need for trails, pathways and walkable neighbourhoods. Running, cycling and jogging are also a high participation activities, which reinforces the need for trails and paths linked to safe and appealing areas.

It is hoped that the expressed intention of the proponent to facilitate the development of river trails for Hillier Park residents will articulate with the Gawler Council's plans for public to access the river. The Food Forest would be prepared to provide public access via a corridor along its most western boundary, to facilitate trail-users' access to the Council Reserve (leased to the Gawler Pony Club), which has significant river frontage and provides access to a significant loop including Clifford Rd which is already used by many walkers from Hillier Park.



Rough hypothetical of potential trail network for Hillier Park residents

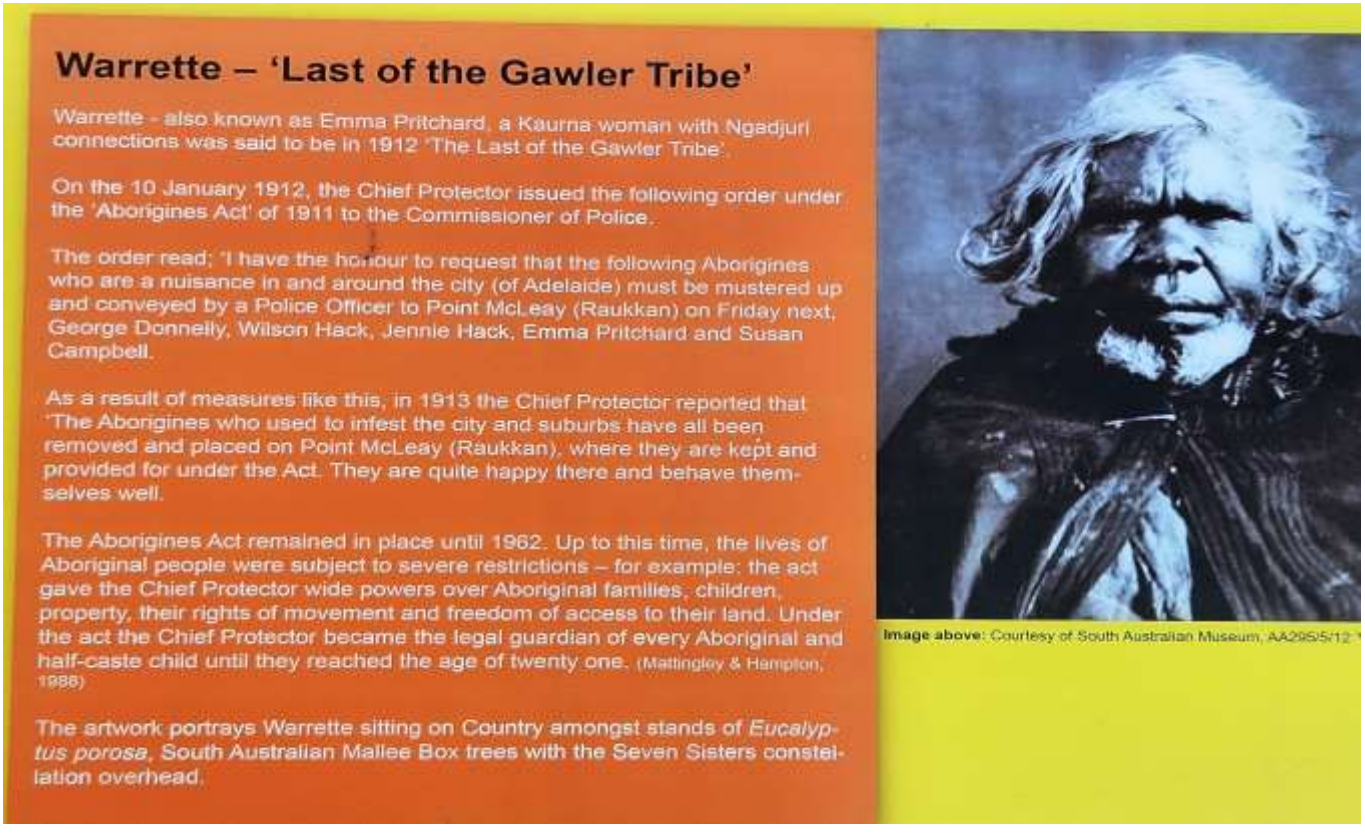
The Barossa, Light and Lower North Open Space and Public Realm Strategy points out how important trails are for tourism as well as recreation areas and visitor areas. One of the goals is to 'Work with State Government and relevant Councils to promote development of a linear park along the Gawler River from Gawler to the coast.'

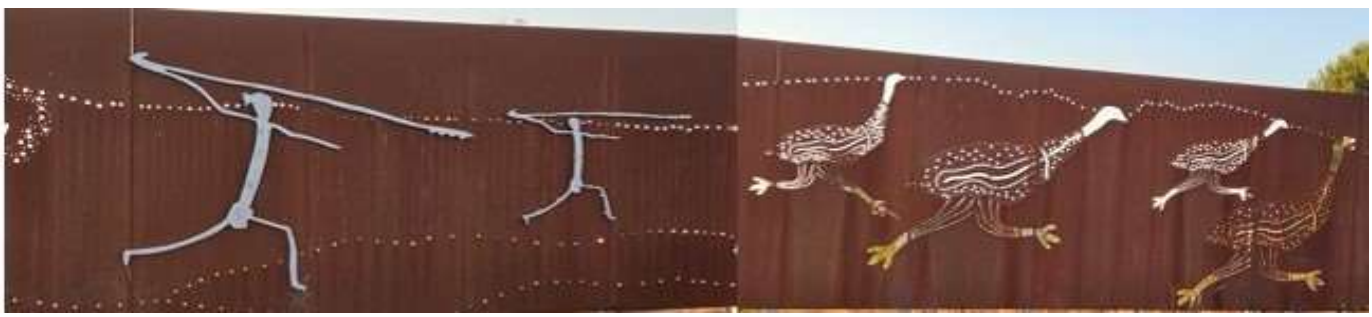
Well concieved and managed, the site would offer the opportunity for significant improvement to existing biodiversity and amenity, partiularly utilising the rainwater falling on the site and how excess storm water could be directed. The information in the URPS publication about the code amendment describes 3 models for the management of such water. One hopes that the water will be captured and used by individual dwellings as well as soaking ino the landscape in WSUD vegetated percolation basins, and broadly following the slope of the land to the river, before which it would be settled and cleansed in an engineered wetland, to achieve acceptable P, N, pH and turbidity levels.

Quoting a range of academic research, the Joint Group of community environmental organisations in Gawler [Gawler Environment Centre (GEC), Gawler Environment and Heritage Association (GEHA), Transition Gawler (TG) and Gawler River Riparian Restoration (GRRR)] has suggested strongly that no residential subdivision (or similar) be allowed close to the channel bank of the River (ideally no less than 100metres), nor on Gawler River floodplain land, such that a viable biodiversity and trail corridor can be established. It is noted on the Schematic Plan overlay and Water Resources overlay in the code amendment proposal that there may be an incompatible overlap of River corridor and housing.

Education and heritage

Signage and accessible website information is important in creating public knowledge of the River's natural and cultural heritage. This signage and environment art is on Gawler's Eastlink Road.



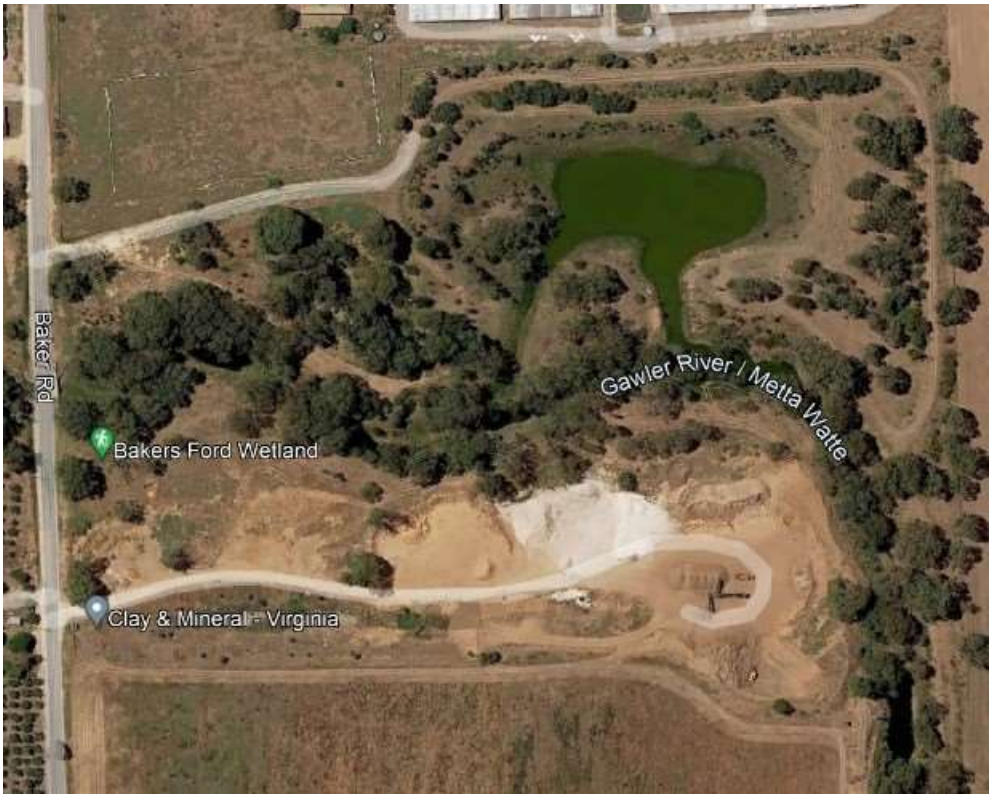


Baker Rd Wetland





The Baker Road wetland is an off-channel pond (north of Virginia) that allows river to move through the wetland when flows are moderate to high and holds water for extended periods without inflow, creating a very useful resource for aquatic and ephemeral life to bounce back from in dry periods. On the opposite bank is Virginia clay and Mineral pit which, like the rest of the loam mines along the river is essentially unregulated and can be abandoned at the convenience of the miners with virtually no government oversight (loam mining not falling under the Mining Act, which holds the holder of a **mining** tenement responsible for rehabilitating the land disturbed by mining operations.)



Baker Rd wetland

Land use issues to be resolved through policy and regulation

Virginia Clay and Minerals

Links to Rural Land in Hillier

As mentioned above , it has been shown that biodiversity associated with river corridors is massively increased by 'wrapping' it in rural land. In the case of Hillier, it is clear that there are many productive agricultural and horticultural enterprises (many multi-generational) that use the excellent soil and water resources to provide food, fibre, greenspace and employment for local people. It is suggested that up to a kilometre of rural land be permanently

protected by a Parliamentary Bill or EFPA status, such that the rural nature of the land is secure.



Suburban housing has been built within metres of the channel of the Gawler River in Angle Vale.- compromising biodiversity and increasing flood and fire risk

This would also provide a rural gateway to the Town of Gawler and help with the significant heritage of the river, its culture and built environment. An economic case for this planning decision is foreshadowed in the paper 'Investigation of Farm Economics in Hillier and Kudla' by Regional Development Australia' Tony Burfield. It is suggested that access to the river from the farmland be organised with landholders and a 'firebreak' be negotiated, particularly south of the river (depending upon the topography etc).

[redacted]

Graham Brookman Coordinator GRRR

[redacted]

NOEL ROEDIGER'S INFORMAL MEMORIES

A record of creatures that have called "Riverside" home or visited. (other than humans, their pets, and farm animals) NOTE: * denotes creatures that were here but have vanished for various reasons.

CREEPY CRAWLERS & BUGS: I've never gone searching but many reside. Centipedes, earwigs, scorpions, stink beetles, clickers, all sorts of ants, white and black termites. wichety grubs, borers, worms, slaters and black beetles, ladybirds, aphids etc.etc..

INSECTS: Many types

BUTTERFLIES & MOTHS: Many of both. Although classified as a noxious weed I've kept an area protected where there are quite a number of wild cotton bushes. It is the plant Monarch butterflies prefer to lay their eggs on. Numbers of new butterflies vary from year to year.

BEES: Apart from the farmed honey bees there appear to be at least 5 varieties of native bee.

WASPS: I think we have at least 5 different types of native wasp along with European Wasps. The latter became rife about 15 years ago but are now seen on few occasions.

FLIES: House fly, bush fly along with blow, bot, horse and March flies. There are others I've never bothered to identify.

SPIDERS: Huntsman, Wolf, Trapdoor, South Flinders Funnel Web, Redback and mutations, White Tailed, Black, various Orb types, Daddy Long Legs and many other smaller types.

SNAKES: I believe only Brown and Red Belly Blacks reside.

AMPHIBIANS: Many. Haven't identified types.

LIZARDS: Blue Tongue, Stumpy Tail, Bearded Dragon plus various skinks and geckos.

OTHER ANIMALS: Echidna. Rarely seen but that's normal. It's a rare privilege. Those I've encountered are quite content to be stroked and have a tummy rub.

Possum. We have brush tails but I'm bemused by their appearance/disappearance. We had a female that adopted us because Bev gave her piece of apple. She visited each evening, just as darkness fell, for about 8 years and during that time presented 11 babies. They all accepted us, except for 1 who was an aggressive maniac. Strangers were also accepted as friends and sometimes she came inside and was contented to be stroked. Then she simply ceased to visit. Some time later we found numerous dead possums. Now they arrive and disappear now without rhyme or reason.

Kangaroo and Wallaby: Occasional visitors but increasing. Have seen a mob of Roo's in Angus Krieg's property on Ward's Belt.

Koala and Echidna: Not common but obviously here.

INTRODUCED SPECIES: Rabbit, Hare, Fox, Rat, Mouse, occasional Fallow Deer. (released from Buckland Park 1953).

Gawler Environment Centre

Submission on the Greater Adelaide Regional Plan

By: Gawler River Riparian Restoration, Gawler Environment Centre, The Food Forest

Gawler's Southern Area – Food Bowl and Biodiversity hotspot

To: South Australian State Planning Commission, Minister for Planning

Date: 6 Nov 2023



Gawler's unique soil and climate, and access to bore and recycled water make it a perfect place for a World class Urban Food Bowl, which could feed the rapidly growing population in the north and provide satisfying jobs in land management and food processing at the same time as using waste water produced by new urban developments. Farms, occupying some 1000 hectares of rural land south of Gawler, could be permanently protected from suburban subdivision and provided with policy, technical and business support through Universities, SARDI, PIRSA, Landscape Boards, the Gawler Council, Northern Adelaide Plain Food Cluster and Regional Development Australia. The

Council is engaging with these bodies to develop an holistic plan for the rural area and the Gawler River aimed at both prosperity and environmental excellence.

The rural land, principally in the Hillier and Kudla areas, features modest-sized properties suited to intensive field and protected growing, nurseries and high value animal breeding and equine enterprises.

Water

Some of the area has access to good quality groundwater and the Virginia Pipeline scheme reaches the western area with recycled water for irrigation. There will be significant sale of properties west of Hillier as suburban subdivision proceeds around Angle Vale and Virginia that will make more water available in this area.



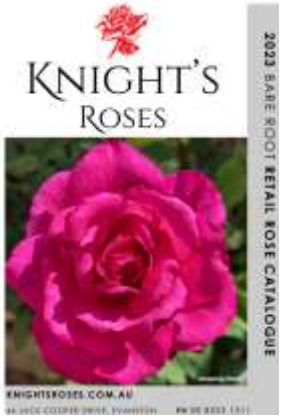


More than a gigalitre of water from the NAIS scheme can also be made available by SAWater provided demand from the Gawler area is sufficient. There will also be growing demand from sport, recreation and amenity areas in Gawler as its population expands. it is believed that, with some 1000 hectares of ag/horti land , the project would be likely to attract enough landholders (possibly including Council) using 6-10 ML per hectare to create a demand that will satisfy SAWater's demand requirement to capitalize the water scheme. If some outside funding to reduce the upfront costs could be obtained, the scheme would be much more 'saleable' to users.

Gawler would be a logical area to house a modern sewerage plant for the North to provide high quality irrigation water and promote circular economy.

Existing agricultural production

The area is home to many successful farming and horticultural enterprises, in part described by the recent survey by Regional Development Australia (attached) and snapshots of some of the landholders (attached).






These include dryland farmers, horse breeders and trainers, racing stables, fruit and nut producers, floriculturists, field vegetable growers, protected growing specialists, food processors and some of SA's largest nurseries. These enterprises are supported by agribusiness firms, marketers, contractors, professionals and employees, generating significant employment.

An important group of rural landholders are lifestyle farmers who value their rural activities whilst also undertaking other employment in the Adelaide area.

Producers like these will readily adopt new and more efficient/sustainable ways of using their land but it is expected that, once the GARP has provided a lead in terms of regional planning and zoning, there will be a number of landholders who will offer their properties for sale or swap, so the area may well attract younger, more energetic owners anxious to grow careers in a new irrigated area away from shallow, saline aquifers closer to the coast. Many of the tree crops grown can produce Gross Margins of $50-100K per hectare, and with higher infrastructure costs, Protected Growing can return far higher Gross Margins:

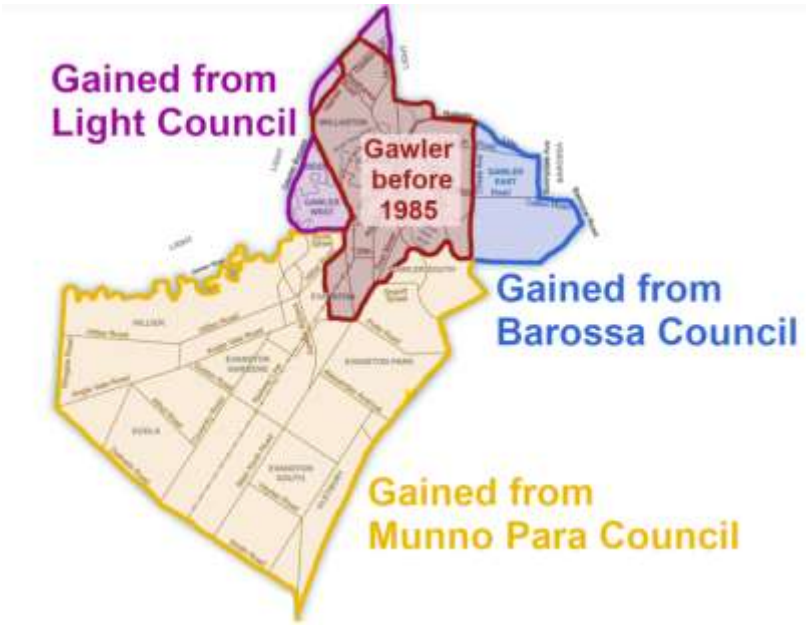
Financial Assessment of Glasshouse Operations (per Hectare)		**10,000** Sq. Metres
	Hi Tech Hydro	**Medium-Hi Tech Hydro**
Development Costs	3,000,000	2,000,000
YIELD per Square metre kg	100	65
TOTAL YIELD	1,000,000.00	650,000.00
Price Sold per Kg	$2.90	$2.60
GROSS RETURNS	2,900,000.00	1,690,000
Costs per kg	$1.90	$1.70
TOTAL COSTS	1,900,000.00	1,105,000
PROFIT (excluding Depreciation)	**$1,000,000**	**$585,000**
Yearly Return on Investment	33%	29%

Regional Development Australia has also conducted of the area as it currently functions



The Kudla Area

Kudla has a high percentage of the very small holdings in Gawler's southern rural area, directly abuts Playford Council and some of it is part of the notional Gawler Green Belt. Its future has been long discussed and has been considered by professional planners for over 20 years. It is important that it be integrated into a coherent regional plan in this review of the GARP.



The locality was recognised in the 1980s taking its name from the railway station that had been constructed in the 1960s. It was historically part of the District Council of Munno Para and during that period some (now anomalous) retail and light industrial strip development was approved along Main North Road as well as the Rural living area at Kudla. Gawler Council absorbed the area to Dalkeith Rd in 1985 in a boundary realignment regarded as hostile by the Munno Para Council and many residents.





Part of the Rural Living area has been further subdivided and a group of landholders, developers and others has lobbied Gawler Council for further Council services, culminating in claims that the Rural land south of Gawler is unsuitable for agriculture and should be released for residential subdivision. This vocal group have troubled the broad population of Gawler that have long expressed their desire for an agricultural area to remain between 'the City' and Gawler and the professional farmers and horticulturists who occupy much of the land. The Gawler Council has sided with State planners and supported the maintenance of Rural zoning for the Hillier area which is home to many agricultural enterprises but the pressure for subdivision is driving up land values to the point that protection of the Rural land from rezoning is required for orderly planning to prevail.

Given the diverse ownership of the many small titles in the area, the establishment of a denser population and increased servicing of part of the Kudla area to create a Rural Neighbourhood with basic services is recommended and much of the work of the Jensen reports provides background to that change.



Looking west along planned MOSS corridor (Dalkeith Rd)

The 'Gawler green belt' space in this locality is generally on the southern side of Dalkeith Rd, in the City of Playford and it merges with its Rural Neighbourhood zone, but on some iterations of the MOSS, small-holdings are included. It can be a **hard working, relatively open space area** that houses public infrastructure like cables and pipelines, sequesters carbon, provides playing fields, **produces food**, houses biodiversity and conducts stormwater.

Land allocation and exchange

To develop a coherent and permanent 'Food Bowl" area, the Government can arrange for land exchange as per the Dutch model for rural 'land verkaveling' where land owners can 'swap' one piece of ground for another (with some financial adjustment) in a process sponsored by a government or bank. For instance a landholder could give up their land in a proposed green belt or agricultural area for a new (possibly more valuable) piece(s) of land in a new subdivision on land owned by a government authority, potentially with additional recompense. Equally the process could facilitate the swapping of land such that parties with widely scattered land holdings could participate such that their properties could be consolidated.

This process is used commonly in America through systems such as Tradable Development rights, and Non Contiguous Clustering.

Expecting current market forces organise something like the protection of the Gawler River, and the creation of a Food Bowl plus an associated village, in the existing ownership landscape, seems fraught with risks and the potential for making almost everyone except developers unhappy.

Perhaps the Planning Commission could engage with Council in organising an equitable and flexible way of enabling most land owners to come out of the re-conception of Southern Gawler reasonably happy about how the changes to zoning etc will affect their life plans.

Note the attached papers which suggest ways in which SA could develop a more sophisticated way of dealing with peri-urban zoning challenges. Also attached is an introductory sheet to the Mt Barker Workshop organised by the Royal Geographical Society (SAB) on this topic held a couple of months ago which gives useful background.

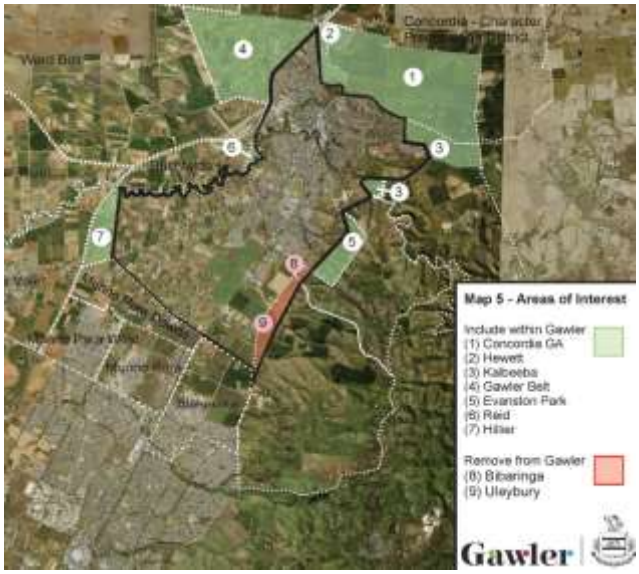
Protection and Land Valuation

With all of the above, there is still room for consideration of the relatively simple use of EFPA zoning and its linkage with Notional Land Values. A basic concession to EFPA land holders in the Food Bowl would be the ongoing consideration of the effective land value by the Valuer General, that would normally be less than land converted to Deferred Urban or other non-EFPA zoning. Notional values should be set so that primary producers, food processors and allied occupations on EFPA land pay lower council rates, levies etc, and can remain viable farming enterprises that can capitalize appropriate infrastructure and equipment.

Using EFPA and Land exchange, an example would be if persons wished to remain farming, but if their land was outside a new EFPA area, (eg in Kudla 'central') they could potentially 'swap' with someone wanting a small Rural neighbourhood block. Effectively the Land Exchange (using proper land values) would involve an honest broker trying to help land owners get what they want in pursuit of a large scale change in land use that is in the public interest.

Boundary Reform

Gawler Council has spent much time preparing a case for boundary reform which would make for a much more efficient use of resources in terms of administering and servicing areas like the small area of Playford east of the Northern expressway, which functions as part of Hillier. Whilst the move for reform has been paused, it may be suit the Planning Commission to note this logical change that could be made to southern Gawler.





The Barcelona model urban food bowl and biodiversity precinct

The Llobregat Agricultural Park ,founded in 1997, is located on the the delta and lower valley of the river Llobregat, in the metropolitan area of Barcelona. Comprising some 3000 hectares, it is protected by a specific planning instrument. The park acts as a green lung for the metropolitan area of Barcelona and as its food bowl. Product distribution is through local markets, Barcelona's wholesale market and export. A brand has been successfully created which attracts strong support from Barcelona city's metropolitan population of 2 million. The Park promotes specific programs to preserve the productive and aesthetic values of the agricultural space and promotes the quality of its products and local cuisine as well as the heritage of the region. It comprises some 600 properties.

The Park is managed by a consortium of municipal councils, convened by the Barcelona Provincial Council and has formal links with the Department of Primary Industries and the equivalent of SARDI The Catalonia government reserves the right to earmark some of the land for major transport routes whilst guaranteeing access to local Park traffic.

The Park attracted support from the 'EU Life Environment' project (in 2000), the provincial government and other sources to the value of some three million euros and was preserved from urban subdivision at three levels of government. It attracts help and funding for the improvement of agricultural productivity using regenerative and IPM techniques and cutting edge irrigation technology etc (in conjunction with Government instrumentalities and universities).



Note the Llobregat river on the left of the picture that flows into the Balearic Sea and the road network crossing the Agricultural Park. The light coloured area toward the top is the International Airport





Key functions:
1) To improve the efficiency of pre-existing infrastructure and agricultural services;
2) To improve systems of production and commercialisation
3) To design a space for quality social life and agriculture in harmony with the natural environment

The Park Information and Management Centre, located at the centre of the Park, occupies some 4.5 hectares and dedicated to education, extension and experimentation. It provides an arboretum of productive tree varieties known to succeed in the region as well as plant propagation facilities. The Centre offers open days, workshops and a vibrant schools outreach program.

The Park's position has been further strengthened through the Catalan Government's implementation of a Natural Environment and Landscape Protection Plan "that guarantees its conservation and quality through a new agroecological productive model that promotes the adoption and conservation of environmental values ".



A South Australian equivalent

Whilst Adelaide may not yet have an identified agroecological urban food bowl, it has the potential for one at Gawler, and Gawler already has a demonstration and learning centre dedicated to agroecological food production and the restoration of the ecosystem, on the bank of the Gawler River. The 20 hectare 'Food Forest' has been involved in teaching, R&D and community outreach for many years.

Adelaide also has its Adelaide Showground Farmers Market, providing an ideal outlet for experienced growers and startups. It provides income for 150 farming and food artisan enterprises and has

regularly won awards as Top Australian Farmers Market. It was crowned South Australia's Top Food Tourism Entity in the State Tourism awards In Nov 2023

In creating a food bowl at Gawler some new financial and land owneship models may be appropriate eg Home - Co-operative Farming (coopfarming.coop) and ORICoop | Healthier food, farmers & land (organicinvestmentcooperative.com.au)





[redacted]

Graham Brookman Coordinator GRRR

[redacted]

Joint Submission on the Greater Adelaide Regional Plan

By: Gawler Environment and Heritage Association, Gawler River Riparian Restoration, Gawler Environment Centre, Transition Gawler, The Food Forest

To: South Australian State Planning Commission, Minister for Planning
Date: 6 Nov 2023

South Australia's population continues to grow steadily as Climate Change manifests itself and there is an absolute urgency that this review of Adelaide's 30 year plan puts the region on track for a sustainable future. Issues such as water, food, biodiversity, climate extremes, sea level, infrastructure and transport, built form and future employment/industry are critical.
This submission focusses on the North East spine which is intimately connected to the North Western spine through shared physical and cultural links such as the climate, groundwater and access to recycled water, agriculture and proximity to markets. **Our constituent groups are keen to be consulted on all aspects of the regional plans relating to Gawler and the Gawler River.**





'Kuri Dance' a painting by George Fife Angas in the 1840s

The Gawler River catchment was managed by the Kaurna people at the time of European settlement and was recognised by both groups as one of the best areas of South Australia for harvesting indigenous foods and the cereal crops British settlers brought with them. Along the river system are some of the caves that contain aboriginal art and a number of the first farmhouses built in the colony as well as the rich historical and built heritage of Gawler.
Paridla Taikunthi, (ParridlaTaikondi) the river junction area, was used as a place for meeting and trading of commodities such as ochre, plant and animal products. The rivers flowing through Gawler acted as a major path from the Hills to the coast for the Kaurna people. The Gawler River is a deeply spiritual place for First Nation people.

Dating from the planning of Adelaide and Gawler by Light, Wakefield and others, South Australia has practiced urban containment, often using parklands to provide outdoor facilities for the population and a buffer for farmland. The Second Generation Parklands /MOSS sought to similarly provide access to nature and to protect watercourses, as Light had planned for 'old' Adelaide. It is appreciated that a link between the Hills Face Zone and the Gawler River Corridor is foreshadowed in the GARP Discussion Paper, both as an inter-urban break and a green belt; It is something that the Town of Gawler has long been promised



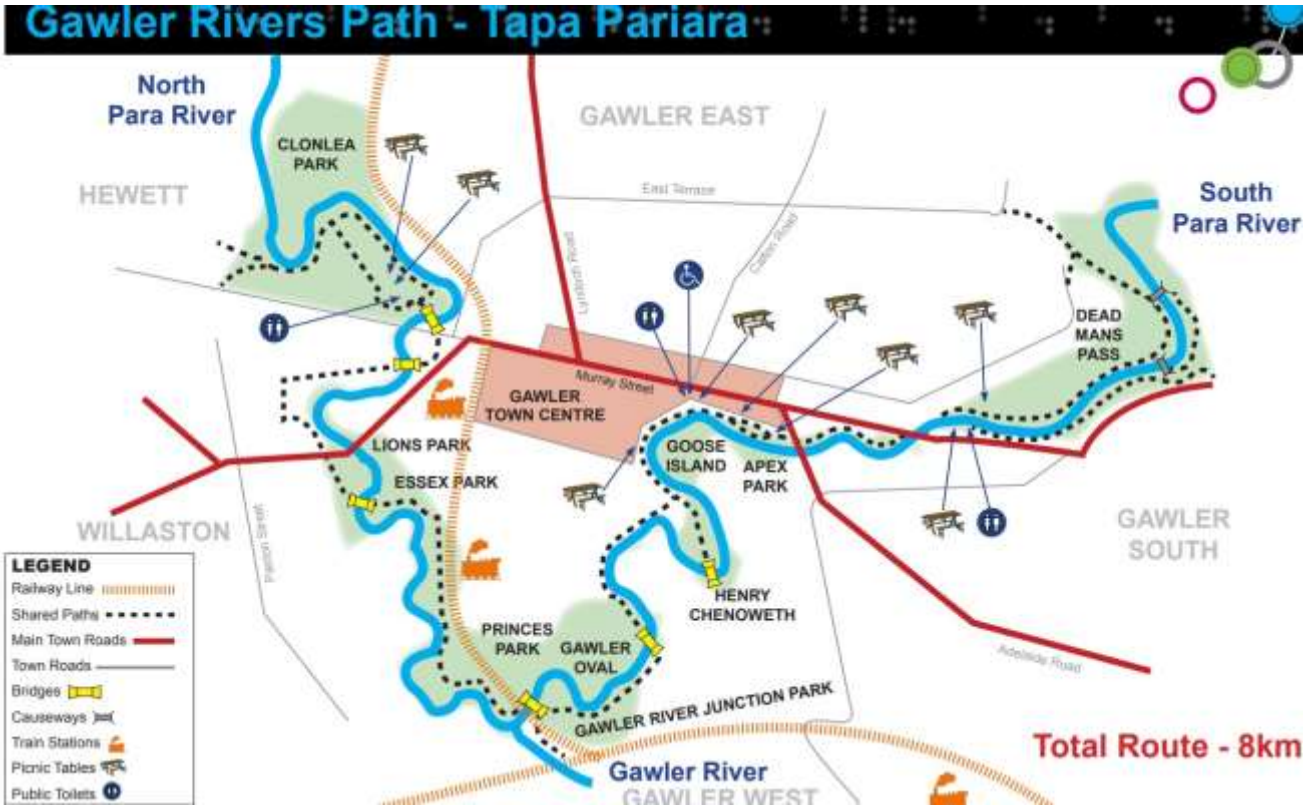
As SA's first country town, Gawler has developed as a major provider of education, health and professional services to SA's lower and mid North as well as the Barossa, Virginia and Adelaide's northern suburbs; it is set in farmland with extremely good soil and underground water sources and is home to some of SA's key plant nurseries, orchards, equine businesses and animal breeders.
Gawler's Agricultural, Horticultural & Floricultural Show dates back to 1854 and the town has developed as a major regional centre with unmatched regional heritage (built and historical), well established services including an Adelaide University campus, the largest school in the southern hemisphere, an excellent electric rail service to the city and emergency services including a key airstrip for bushfire control and other emergencies.
Gawler's Council has long-considered its future in terms of local, regional and global leadership in environmental awareness and management, food security, aged care and education and was SA's first council to formally recognize the climate emergency and resolved to *'rapidly decarbonise council operations by 2030, lead and enable climate action across our community and businesses to achieve net zero emissions and adapt to climate impacts".* It has one of the State's most comprehensive Biodiversity Management Plans and commitments to the development of resilience to storms, flooding, drought, heatwaves and bushfires.


University of Adelaide Campus and Vet Centre


Gawler Town Hall







Having successfully integrated enhanced indigenous biodiversity, active transport trails and low level bridges in an effective network through the town, the Council is proposing that the Gawler River Corridor be widened and protected from loam mining, waste dumping and urban incursion. Ultimately the main trail should reach the sea, travelling through wetlands, along high banks and past many interesting natural and historical heritage sites.

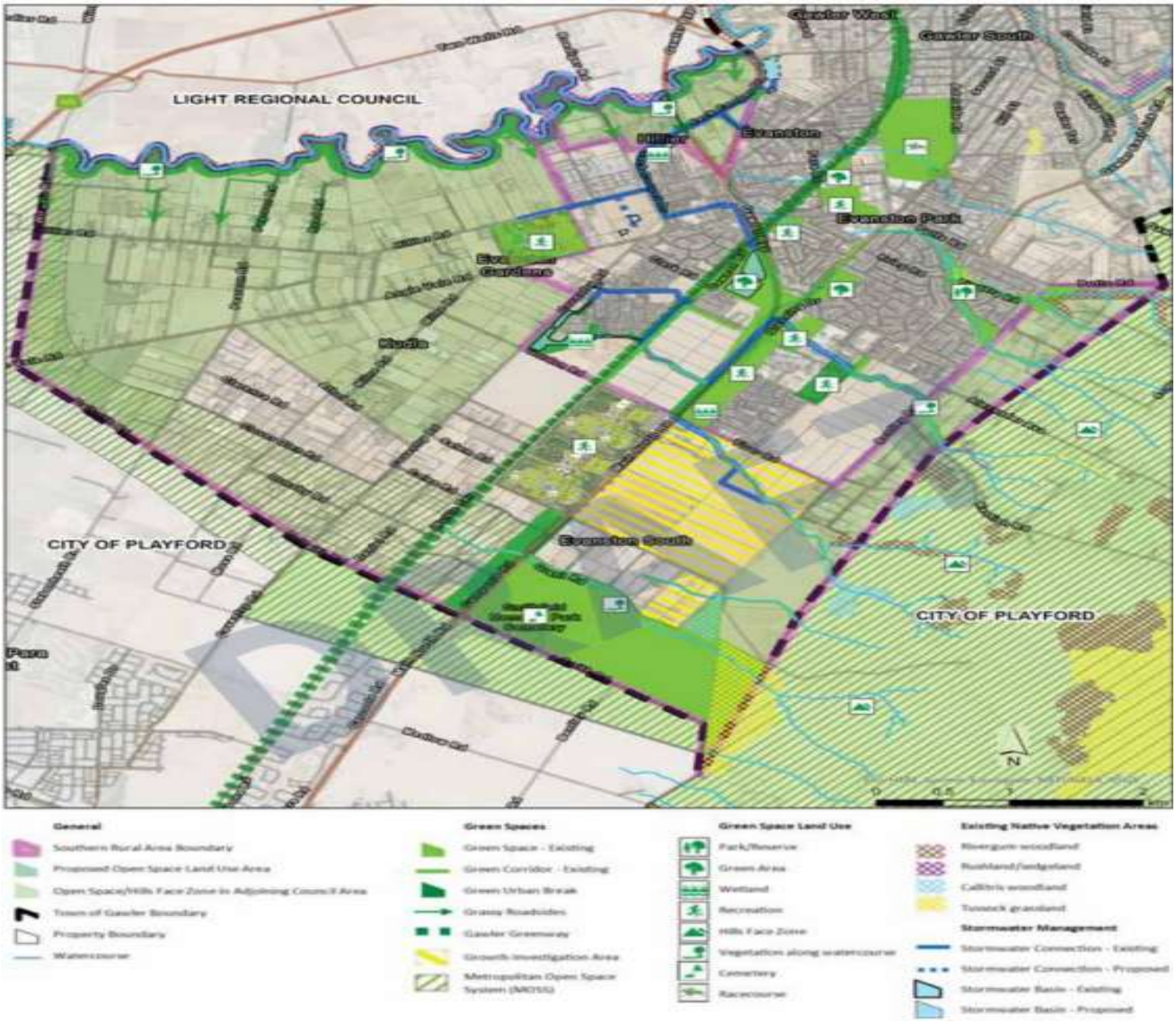
.



Suburban housing has been built within metres of the channel of the Gawler River in Angle Vale, compromising biodiversity and increasing flood and fire risk

We believe that much of the rural area south of the town should be permanently protected from suburban subdivision and that the green belt (or wedge) proposed in the MOSS (hatched green) be formalized, connecting Hills Face biodiversity with that of the Gawler River and providing a form of second generation parkland, a natural break between the northern suburbs and Gawler and a (light green) Food Bowl (protected by EFPA status or similar) providing employment and food security to the region. Draft Council Plan below.

The American researcher BJ Schilling found that effectively preserved farmland is more likely to remain actively farmed, as it attracts young farmers and encourages owners to have succession plans to transfer the land to an active farmer.



Broad support from community groups, councils, landscape boards, industry groups and Regional Development Australia reports has been expressed for the biodiversity restoration of the Gawler River, flood mitigation works, the initiation of a trail from Gawler to the sea and the synergistic engagement of the river corridor with agriculture, bushfire control and heritage preservation. The groups supporting this submission call for Rural land adjacent to the River to be protected from residential subdivision for at least 100 metres from the channel and for the full extent of the flood zone. It is believed that a new flood zone should and will be declared in light of the increase in severity of flooding due to Climate Change and relevant Insurance industry data that is effectively making many suburban homes uninsurable for flood damage. Some of such land may contribute to the 'urban forest' referred-to in Adelaide's 30 Year plan and the transformation of waste water by a modern sewerage treatment plant for the north could produce low salinity recycled water for the area.

Thus many reasons exist for the protection of the Rural land including fire and flood damage minimization, preservation of heritage, culture and sense of place, food security, preservation of

especially productive land, climate change abatement, productivity and employment, biodiversity enhancement, recreation, public health, tourism, water management, education and respect for nature and cultural heritage. Accessible farms, wineries and nurseries enable the public to understand organic and IPM-based food production systems and help to drive circular economies through farmers markets, cellar doors and eco-tourism.



Intensive sheltered stonefruit orchard, Hillier. The synergy of farmland and riparian corridor has been shown to massively increase biodiversity and simultaneously create pools of beneficial species, making organic production and farms using integrated pest management. A significant project to develop active beneficial habitat creation and water management along the river is in the planning stage.

The concept of an *urban food bowl* that harnesses the unique natural resources of an area that could have been converted into residential suburbs, has been implemented successfully in Barcelona, a city of roughly the same size as Adelaide and is eminently feasible on the land adjacent to the Gawler River. As for the Barcelona project, permanent protection of the land is essential for the success of a Gawler Food Bowl, such that the land owners can invest in agricultural and food processing infrastructure in the knowledge that the land will not be rezoned for non-rural purposes, which would likely increase the land's perceived capital value, increasing rates and levies and putting pressure on the owners to change its land-use. Such protected areas have been shielded in a range of other ways that should also be considered in designing the food bowl. Detailed information about the project and Barcelona's Agricultural Park is attached.





It is recognized that the Gawler train line is a major public asset both in terms of effective public transport and as a conveyance through the green and natural belt between the northern suburbs and the Town of Gawler. The psychological effects of biophilia are well documented and the well-being of the community is a key aim of urban design. Even small views and fleeting movement through forests (eg the Haagse Bos in Holland) have an important effect on well-being. Thus, the use of Gawler's existing Eastern buffer, both adjacent to the train-line and giving more distant views to the foothills, has great effect.



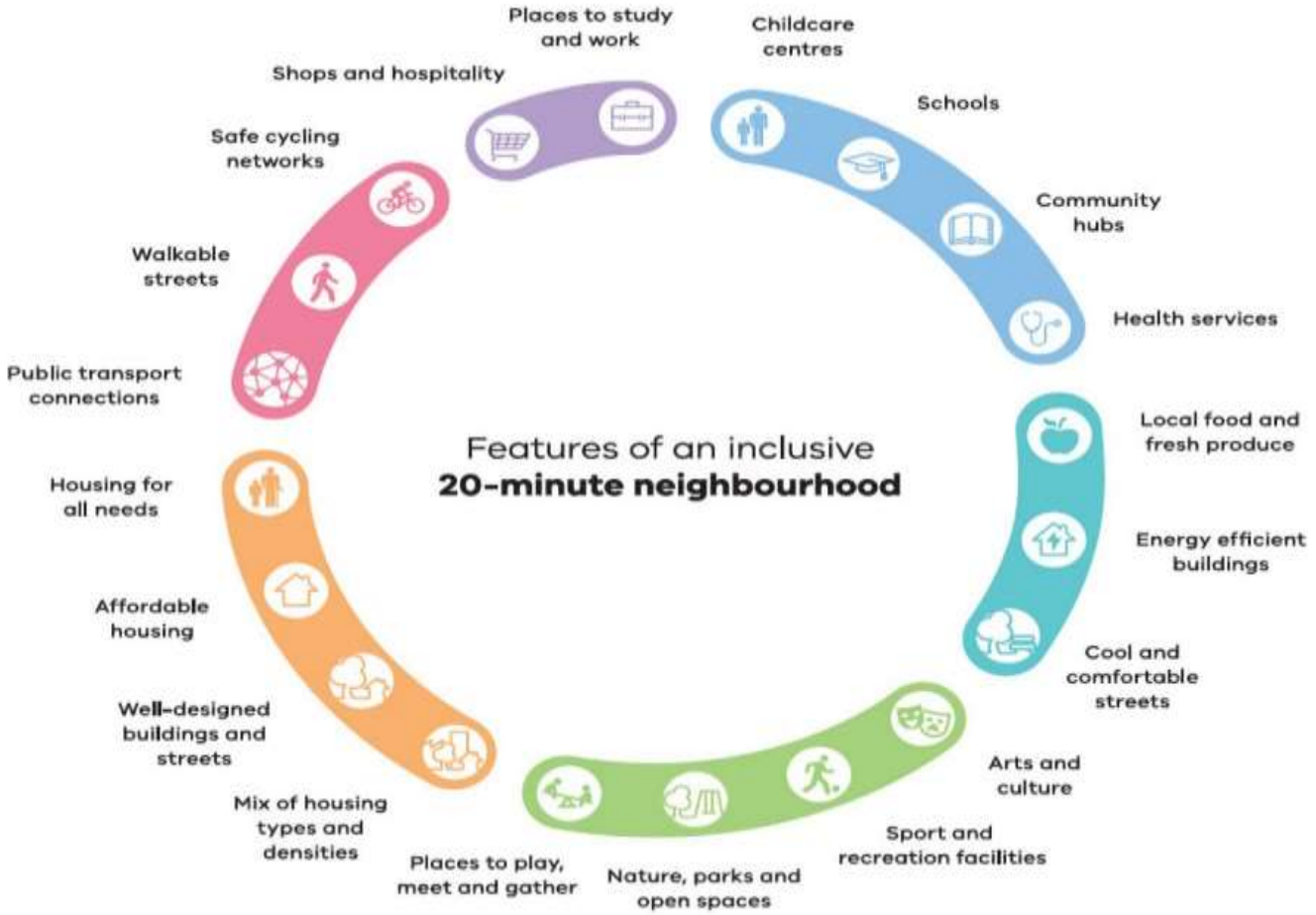
A much loved and appreciated landscape separating Gawler from the city and linking the Hills Face to farmland and the Gawler River.

It is important that land northward from the MOSS is retained as non-suburban space, especially along the Main North Rd and Railway line, preserving such views as seen above.





It is understood that a denser population in proximity to the railway station at Tambelin, will support more services at Evanston Gardens. The characteristics of such residential areas should align with the Gawler Community plan, reflecting such design issues as sustainable management of water including trash-racks, wetlands and enhancement of biodiversity, collaboration between council and developers, significant green canopy, nature-play areas, community education about the natural, historical and cultural heritage of the area. Adequate walking and bike paths should connect suburban areas and the trails along the Gawler River and to Gawler along the Urban Rivers and other bikeways. Strategic parking will also required close to the Gawler river trails. At the same time, small scale parks and other facilities should be provided with regard to the (Victorian) 20-minute neighbourhood concept



Report for Gawler Council and the GARP

The group of Environmental organisations in Gawler held a number meetings and mapped some of the key points of a vision for Gawler. They also commissioned Jim Allen of the planning firm 'Regional Directions' to look at Gawler's place in the GARP and its precursor Review of the State Planning System; he produced the report, 'Gawler Rural Directions" (attached)

VISIONS FOR GAWLER	IN ADELAIDE'S 30 YEAR PLAN
FOUNDATIONS	OUTCOMES
	Climate readiness
	Natural heritage
Biodiversity	Ecological stability
Green Space protection	Ecological water flows
Water management	Nature-based recreation
Sustainable Agrifood systems	Food and water security
	Flood and fire strategies, structures and security
Culture and education	Preservation and development of Historical, Built and Cultural heritage
	Education appropriate for a harmonious, sustainable future
Holistic land management	Resilient and efficient Communities
Planning and construction of a sustainable built environment	Strong health services
Community development	Tourism attraction
Business and Industry	Recreation and sports-parks
Green Energy	Employment, development and prosperity

Whilst most of the foundation for a Gawler vision are mentioned at some length in this submission Business & Industry examples have related to food processing and agriculture (and the fact that Gawler was a thriving industrial town in the early days of the colony), it seems doubtful heavy industry will re-establish, but with a digitally connected World, Gawler offers a very high quality lifestyle, complete with electric rail to the city a close international airport and excellent broadband. It is excellently placed as home for tertiary industry, for which Council has established a business hub.
Gawler's trade and light industry facilities will need to grow quickly to service the building of significant residential suburbs in the North and provide employment for the growing community.

This brief introductory paper should be read in conjunction with attached papers on 'Gawler's Southern Area – Food Bowl and Biodiversity hotspot' and 'Comments on the proposal for restoration of the Gawler River', 'Gawler River – some known restoration areas' as well as other submissions from our constituent groups.
Attached papers include:
Gawler Rural Directions Report – Jim Allen
Some Growers from the Gawler Rural area - Graham Brookman

Graham Brookman
Coordinator GRRR and Joint Submission coordinator

Submission on the Greater Adelaide Regional Plan

By: Gawler River Riparian Restoration, Gawler Environment Centre, The Food Forest

Some growers from the Gawler Southern Area (supplementary paper)

To: South Australian State Planning Commission, Minister for Planning

Date: 6 Nov 2023



DAMIAN MANNO

Damian Manno has confirmed his place as one of Australia's innovative horticulturists, taking home the Corteva Agriscience Young Grower of the Year award at both State and National level.
A determined and passionate grower from the Northern Adelaide Plain, Manno set up his operation – Quality Harvest – on his own just 6 years ago.
His commitment to quality, entrepreneurial mindset and thoughtful use of land has seen Quality Harvest go from strength to strength. In 2023, Manno's operation now spans around 10 acres and produces thousands of bunches of basil, herbs and vegetables each week – including the Herbalicious brand. His team includes some 12 local staff.
Damian said he moved into intensive horticulture because it was a way to make a profit on relatively compact blocks of farmland near Gawler.

His produce is cut and packed on the same day, ensuring it's at its freshest for the consumer, and is 100 per cent free of herbicides, pesticides and insecticides. "It shows that it can be done, it's just implementing the right thing for the location," he said. "I really like the area because it has got the natural gas for the heating, it has got good roads – it's only half an hour to the market".

See Landline Series 2023 : ABC iview for the TV clip

See transcript at https://www.abc.net.au/news/rural/2023-09-30/damian-manno-marlon-motlop-indigenous-herb-growing/102913602



MARLON MOTLOP

This year the first ever Aboriginal Torres Strait Islander Nuffield Scholar in its 70 years - Marlon Motlop, was given the opportunity to research different farming practices from all around the world and bring these ideas and techniques back to Australia.
Marlon's scholarship involves research into Australian Native Foods and their cultural significance to First Nations Peoples and Communities in both Australia, and Around the world.
Marlon's research will provide the foundations to developing a Cultural Standard Framework within Agribusiness and protecting the Intellectual Property of First Nations Peoples and Australian First Foods.
Marlon and his cousin Daniel grow about 20 different types of native herbs and fruits sourced from across the country.
This includes warrigal greens, sea parsley, saltbush and native mint and thyme. They are available both fresh and dried.

Mr Motlop said there were slightly different variations for their products, which are grown in a greenhouse setting. "We can impart different characteristics that are not found in the wild," he said.

Products from The Native Co. are supplied to some of South Australia's best restaurants but are also available for the home cook at the Adelaide Central Market stall Something Wild and Tony and Mark's direct wholesalers.

See Landline Series 2023 : ABC iview for the TV clip

See transcript at https://www.abc.net.au/news/rural/2023-09-30/damian-manno-marlon-motlop-indigenous-herb-growing/102913602



GRAHAM & ANNEMARIE BROOKMAN

The Brookmans live in a homestead built on the south bank of The Gawler River in 1840 and have converted the 20 hectare farm into a showpiece of sustainable land-use using permaculture design principles. Known as The Food Forest, the property is Australia's largest producer of certified-organic pistachios and has topped National, State, and Regional awards for Organic Growing Sustainable Business , conservation and architecture.

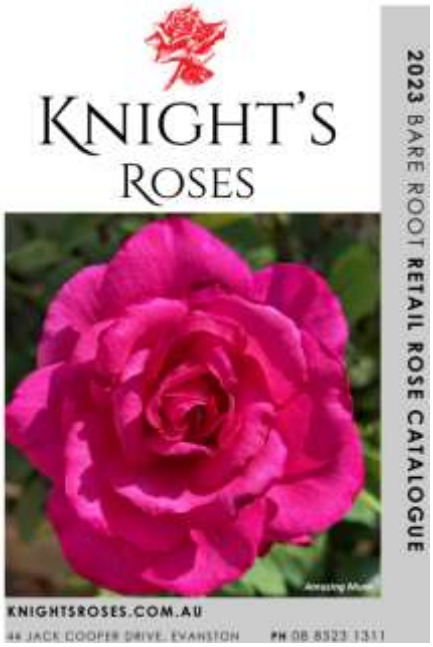
The Brookmans provide employment for up to 15 people in growing, harvesting, processing and marketing some 150 lines of fruit, nuts, herbs, vegetables, wine, cider and vinegar. They are breeding short statured sheep for use in Horticultural properties.

The business has supported the restoration of the Gawler River which flows along the property's boundary for 35 years and is an active member of the Gawler River Riparian Restoration group.

The Food Forest has also developed an innovative system enabling the purification of storm water to standards required for injection into the aquifer below the farm and recover the water for irrigation during the summer.

The Learning Centre at the farm runs an education outreach and farm tour program for schools, TAFE and universities and a busy program of workshops and open days, and has provided learning experiences for thousands of people as well running an eco tourism enterprise.

Visitors can experience the ambience of one of SA's oldest farms, inspect historical farm machinery made in Gawler, walk through the indigenous vegetation and view fauna by the river as well as seeing how a modern intensive organic farm functions.



DANIEL KNIGHT

Daniel Knight is the principal of Knights Roses, South Australia's largest wholesale rose supplier, growing over 350,000 rose bushes annually, of over 700 varieties. He is the second generation of his family in the role and has grown the business using advancements in propagation, breeding and technology as well as sophisticated contemporary marketing.

Inheriting his father's passion for roses, Daniel planted his first crop at the age of 18. Expanding their holdings into the Salisbury area, the father-son team returned to Gawler in 1992 because of the abundant water and land supply.

Knights is well known or its production of outstanding new Australian varieties, many of which are teamed with important charities, assisting them to raise funds for their important work.

The business employs up to 50 people and markets plants across Australia.

From: [redacted]
To: DIT:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 2:02:56 PM
Attachments: image001.jpg
Submission_GARP_GPSA.pdf

> You don't often get email from [redacted]. Learn why this is important

Hello,

Kindly refer to the attached submission from Grain Producers SA (GPSA).

Thanks,

Kavya Manjanna
Policy and Projects Officer
M: [redacted]
[redacted]

Level 13, 431 King William Street,
Adelaide SA 5000

www.grainproducerssa.com.au
P:1300 734 884 **F:** 1300 734 680

GRAIN PRODUCERS SA
The voice of South Australian growers

Grain Producers SA Ltd
Level 13, 431 King William Street, Adelaide, 5000
P: 1300 734 884 F: 1300 734 680
ABN: 43 154 897 533
grainproducerssa.com.au

6 November 2023

Planning and Land Use Services
Department of Trade and Investment
GPO Box 1815, Adelaide SA 5001

Email: plansasubmissions@sa.gov.au

To whom it may concern,

Grain Producers SA (GPSA) is the peak industry body representing 4,500 grain producers in South Australia. GPSA appreciates the opportunity to provide feedback on the Greater Adelaide Regional Plan (GARP) Discussion Paper as part of the State Government's review of planning in South Australia.

The GARP aims to shape the future of South Australia's capital and its surrounding areas. While urban development is essential for the growth of the region, it is crucial that the plan includes measures to protect productive broadacre cropping land from housing expansion.

South Australia's grain sector plays an important role in the state's economic development with the farmgate value of the sector estimated to be at $4.4 billion in 2022-2023 with the aim to become a $6 billion industry by 2030. Protecting productive cropping lands ensures the continued prosperity of the agricultural industry, which provides jobs, exports, and a stable source of income for communities.

Broadacre cropping land in the region is highly productive, yielding crops for both domestic consumption and export. The ongoing protection of productive land from housing and other development supports South Australia's role in the national and international food supply chain, bolstering economic opportunities. Preserving broadacre cropping land sustains rural communities that depend on agriculture. It helps maintain employment opportunities, infrastructure development, and the overall well-being of these regions.

In recent years, we've seen the expansion of housing on productive cropping land in areas such as Roseworthy and Freeling, which are on the fringe of Greater Adelaide. GPSA understands and supports the need for more housing to meet demand, particularly to accommodate more agricultural workers, but it should not be at the expense of productive broadacre land.

As the National Farmers' Federation tells us: "despite a growing population to feed in Australia and overseas, the amount of land available for food production is diminishing as farmers face fierce competition from urban sprawl, mining and energy developments, transmission lines and carbon offsets. Over the past 30 years, Australia has lost over 15 per cent of its farmland".

The food that grain producers grow is in high demand across the world to meet nutrition and protein demands and we simply cannot afford to continue to lose productive cropping land. Over the next 30 years, we can't afford to lose any broadacre cropping land if we are going to keep feeding the world in a climate that keeps on changing.

It's also important that through planning policy, we are giving the grain industry in South Australia the confidence to invest and expand their broadacre operations without the threat of having a new housing estate at their doorstep.

Regarding "A38. Develop guidelines to ensure that the interfaces between new development in growth areas with surrounding primary production land and/or nature protection areas are sustainably managed and that buffers are provided and integrated within the growth area", this is a commendable goal with significant environmental and social benefits. However, ambiguity in the guidelines can lead to misinterpretation and inconsistent application, which may undermine their intended purpose. It is essential to provide detailed criteria and standards for sustainable management and buffer establishment to avoid potential conflicts.

Creating guidelines is one thing but enforcing them and ensuring accountability is another. Without effective oversight and monitoring mechanisms, compliance may be lacking. Adequate enforcement measures and penalties for non-compliance should be incorporated into the guidelines to ensure their effectiveness. The challenge is to find an equilibrium that allows development while safeguarding the environment. Striking this balance may require trade-offs and could be contentious in practice.

Guidelines should not be developed in isolation. They need to be part of a broader, comprehensive planning process that considers long-term regional development, infrastructure, and the integration of broadacre cropping areas. Consulting local communities, grain producers, and industry organisations is crucial to ensure that the guidelines align with the values and needs of the affected stakeholders. Failing to engage these groups could lead to resistance, opposition, and ultimately, the guidelines' failure.

By protecting productive broadacre cropping land from development, we encourage sustainable agricultural practices that not only improve soil health and water management but also help adapt to changing climate conditions, making the region more resilient. Preserving these lands from development also protects the biodiversity of the region.

A well-balanced regional plan should prioritise sustainable development, which includes maintaining a balance between urban expansion and agricultural land preservation. Protecting productive broadacre

cropping land is not only economically beneficial for the state but also pivotal in addressing the changing climate and securing food resources. A forward-thinking approach that considers the long-term well-being of South Australia is essential.

Once again, thank you for the opportunity to provide GPSA's input into this important consultation.

Your Sincerely,



Brad Perry

CHIEF EXECUTIVE OFFICER

GRAIN PRODUCERS SA

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 2:44 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Grounded-CLTA-Submission_-Greater-Adelaide-Regional-Plan-GARP-6-November-2023.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Advocacy Organisation
Given name:	Elle
Family name:	Vallance
Organisation:	Grounded Community Land Trust Advocacy
Email address:	[redacted]
Phone number:	[redacted]
Comments:	submission prepared by Elle Vallance and Emma Belcher on behalf of Grounded.org.au
Attachment 1:	Grounded-CLTA-Submission_-Greater-Adelaide-Regional-Plan-GARP-6-November-2023.pdf, type application/pdf, 6.6 MB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Grounded

Community Land Trust Advocacy

Submission to the Community Consultation for the

Greater Adelaide Regional Plan (GARP) 2023

Planning and Land Use Services, Government of South Australia

Prepared by Elle Vallance & Emma Belcher
on behalf of Grounded Community Land Trusts Advocacy
grounded.org.au


Grounded
Bringing community led housing to fruition

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Executive Summary

Grounded Community Land Trust Advocacy (Grounded) warmly welcomes the opportunity to provide a submission to the GARP 2023. South Australia has a well deserved reputation as an innovative and progressive state. We encourage the GARP to continue that tradition and to fully leverage the opportunities presented in the development of the plan to maximise the benefits for current and future generations of South Australians. This is an opportunity to create a more socially equitable and cohesive community and to minimise the impacts of locational disadvantage. It is vital our communities become greener and more resilient in adapting to climate change.

Building a strong, smart, clean, regenerative economy will ensure South Australia is well placed to face future global uncertainties and for government revenue to be able to fund essential infrastructure. Underpinning all of this, is the need for a greater range of appropriate housing in the most suitable locations. Secure housing provides the stable foundation for people to build their lives, grow their families and build strong and resilient communities.

Grounded believes that along with effective policy levers at both the state and federal level, that community led housing provides the best approach to balancing competing interests and long term positive outcomes. We suggest that GARP adds intergenerational impacts into their decision making and outcomes measurements. Too many interventions benefit only the initial subsidy recipient rather than contributing to long term, community benefit. It is time to restore a better balance between the individual resident and the community, between local wages and housing costs. It is paramount that policy and planning decisions are made for the benefit of the whole community rather than those who are likely to profit most.

If Community Land Trusts (CLTs) were championed by a visionary government agenda and coupled with philanthropy, impact investment and tailored mortgage instruments for residents, CLTs and community led housing projects could become the preferred vehicle by which the progressive aspirations of the GARP are materialised in South Australia.

Key Recommendations

1. Prioritise community-led housing approaches to ensure housing meets local priorities and supports long term amenity and benefits
2. Support the establishment of a community led, affordable housing ecosystem
3. Fund a CLT establishment fund to seed a statewide rollout
4. Develop appropriate financial instruments for future residents to obtain CLT mortgages
5. Focus on perpetually affordable housing, not just first resident or time limited schemes
6. Include long term intergenerational outcomes (affordability / climate / cohesion / equitability) as part of key outcome considerations
7. Redirect individualised subsidies into the establishment of a perpetually affordable housing ecosystem

8. Limit greenfield urban sprawl to preserve arable land, and restrict the expansion of satellite city growth to existing boundaries
9. Prioritise brownfield urban renewal and infill, particularly modern micro villages, to achieve high amenity ‘Living Locally’ modern micro villages
10. Give NFP housing organisations priority access to Renewal SA land-banked land, before offering it to the open market
11. Use government levers to reduce private developer land banking
12. During economic downturns, governments should prepare for a land buying spree to rebuild the public land bank

About Grounded Community Land Trust Advocacy

About Grounded

Grounded Community Land Trust Advocacy is a not-for-profit registered charity established to advocate, incubate and accelerate the development of Community Land Trusts in Australia. Four members of our national Board are South Australian residents.

Our Advocacy

We are living in a society where two million property investors have control of both the housing market and the politics surrounding it. This has caused a desperate situation where many young people can't afford to leave home until well into adulthood; where solo mothers and their children are living in cars; and where retirees are finding long-term refuge in caravan parks.

Meanwhile, the impacts of climate change and environmental breakdown ravage more and more communities across the country. Australians are growing increasingly aware of the importance of building and sustaining strong and resilient communities that prioritise fairness, equity, and responsible land stewardship.

We want to ensure that a diverse mix of housing models is possible in Australia. We urgently need a citizen-led response to the hollowing out of a core human right – a place to call home.

Community Land Trusts offer a much-needed alternative to the broken buy/rent duopoly through the delivery of an affordable, equitable and sustainable model that prioritises people and the planet.

Indigenous Acknowledgement

Grounded acknowledges and pays our respects to all 500 First Nations throughout this land and honour the stewardship demonstrated over 60,000+ years. We acknowledge that sovereignty was never ceded.

Community Land Trusts

What is a Community Land Trust?

Community Land Trusts (CLTs) are a for-purpose housing model focused on delivering housing that meets key community needs and provides the most cost effective affordable housing.

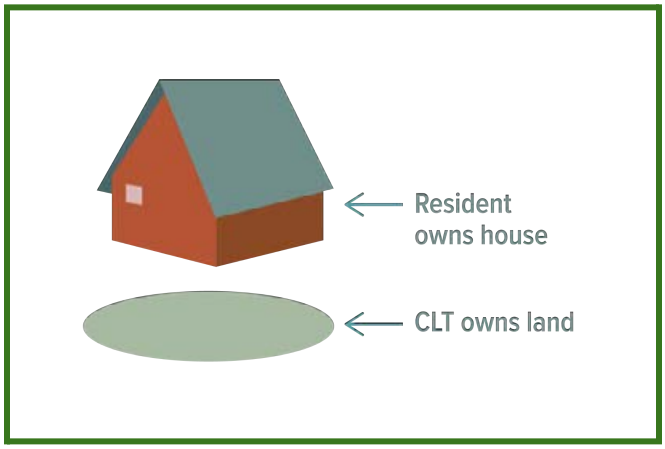


Image: Grounded

The CLT establishes a Trust to own the land and steward the land in perpetuity. The dwellings, sitting atop the land are developed by and owned by the residents themselves. This can be through a partnership with a Community Housing Organisation, a rental housing cooperative, an owner occupier housing cooperative, or as stand-alone private dwellings. A CLT may also elect to include community facilities, commercial buildings or farming land in its asset portfolio, dependent upon the needs and aspirations of the community it serves.

The resident pays an ongoing land rent to the CLT for the ongoing use of the land on a 99 year lease. The resident only needs to borrow for the value of the house. By separating the land and dwelling, the upfront cost to the resident is significantly reduced. At the same time, the resident prospers from modest wealth generation benefits of home ownership, stable housing tenure and the motivation to deeply embed oneself in the social, cultural and economic life of the local community.

This requires some nuance from government in separating the land from improvements in property titling. This form of innovation should be welcome in the state where Torrens Title was developed.

The nature of the CLT model sees the development cost shared between funds raised by the Trust (often via government, philanthropy and impact investors) and the resident (via mortgage). This **delivers a scalable return for government investment** that operates in the knowledge that any future property sale has affordability locked in place. This affordability lock is enshrined

within a triple check formula: a monthly land lease, a resale formula (with an agreed split in gains between Trust and seller) and a legally enforceable covenant that limits prices to 30% of the median income earner in the region. One government subsidy can assist a lifetime of affordable housing.

This compares to government run shared equity programs that rely on selling to the open market to recoup the 20-40% equity lent to the home buyer. The new buyer is required to enter at a higher price, potentially requiring even higher government subsidy.

CLTs will assist those missing moderate income earners now priced out of the open markert by reducing the deposit gap. By only having to borrow for the improvements (i.e. dwelling), a CLT resident may only require a deposit of $50,000 instead of a $150,000 deposit. This will help to reduce local rental pressure. Missing moderate income earners, who once could afford their own homes with a $50,000 deposit, are now able to enjoy security of tenure.

A CLT embeds perpetual affordability, environmental sustainability and land stewardship into its core purpose. By separating the land and dwelling, the cost to the resident is significantly reduced, whilst still providing the benefits of home ownership. The resident only needs to borrow for the value of the house.

CLTs assist to stabilise house prices for future residents as the increase in property values is more closely aligned with increases in median wages. This avoids land price inflation inclusive of speculative drivers. Housing stock therefore remains affordable and relevant to workers on local wages.

CLTs provide competitive returns on investment in terms of public investment, affordability and social cohesion. Demand-side subsidies such as the First Home Owners Grant (FHOG) put upward inflationary pressures on house prices, exacerbating housing unaffordability over the long term. By contrast, the UK experience has shown that initial subsidies provided by the government to establish a CLT ensures that the taxpayer funded subsidy is retained within the CLT structure and the affordability benefits remain available for future generations of residents.

Similarly, with less spent on land, CLT residents have more discretionary budget for development of climate change attuned housing. This could include a fire bunker in bushfire prone regions, or hurricane proof housing.[1]

[1] Applegate, A. CLTS are Building Disaster-Resilient Neighborhoods, 2022

The UK CLT Network has helped facilitate the growth of CLTs from just a handful at the time of the GFC to nearly 600 CLTs currently.[2] Similarly impressive growth is happening in the US, spurred on by major donations from super philanthropist Mackenzie Scott. [3] [4]

In Australia, there are numerous groups diligently working to establish CLTs in their regions. With a few minor changes to housing policy at state and federal level, we could see the establishment and accelerated growth of the CLT sector replicating the outcomes achieved in the UK and USA.

South Australia has a well deserved reputation as a progressive state, leading Australia in social and environmental innovation and the crafting of solutions to complex and pervasive problems. Lower land and housing costs reduce the cost of living pressures for residents and tenant businesses. This thereby frees up time to tend to a home or business, nurture the land it sits on, and contribute to community in meaningful ways.



Image: Grounded

[2] UK CLT Network, Policy & Vision, 2023
[3] Cohen, J. Mackenzie Scott Gives $10m affordable homeownership in Seattle, 2023
[4] Menderson, J. Historic Contribution, 2023

Impacts of Community Land Trusts

The nature of the CLT model sees the development cost shared between funds raised by the Trust (often via government and philanthropy) and the resident (via mortgage). This delivers a scalable return for government investment that operates in the knowledge that any future property sale has an affordability lock in place.

CLTs and community led housing projects can also provide a much more effective way to incorporate place-based factors, such as heritage considerations or preservation of high value natural assets. Connections that are deeply embedded within the fabric of the local community can inspire generous contributions from philanthropists, impact investors and enhanced relationships between communities, local councils and local MPs. This compares to government run shared equity programs that typically struggle to tap into a passionate vein within the community.

CLTs offer the government and the Australian public the most cost-effective affordable housing model available. CLTs provide competitive returns on investment in terms of public investment, long term affordability, and greater social cohesion. Unlike demand-side subsidies such as the First Home Owners Grant (FHOG), **a single once-off government subsidy to initiate a CLT is retained within the CLT structure over time. The benefits can perpetually 'pay it forward' to multiple generations.**

CLTs have a proven track record overseas, particularly in the US in relation to their robustness during the Global Financial Crisis (GFC).[5]

[5] Thaden & Rosenberg, Outperforming the Market - Delinquency & Foreclosure in Community Land Trusts, 2010

Research from the UK & USA indicates that CLTs:

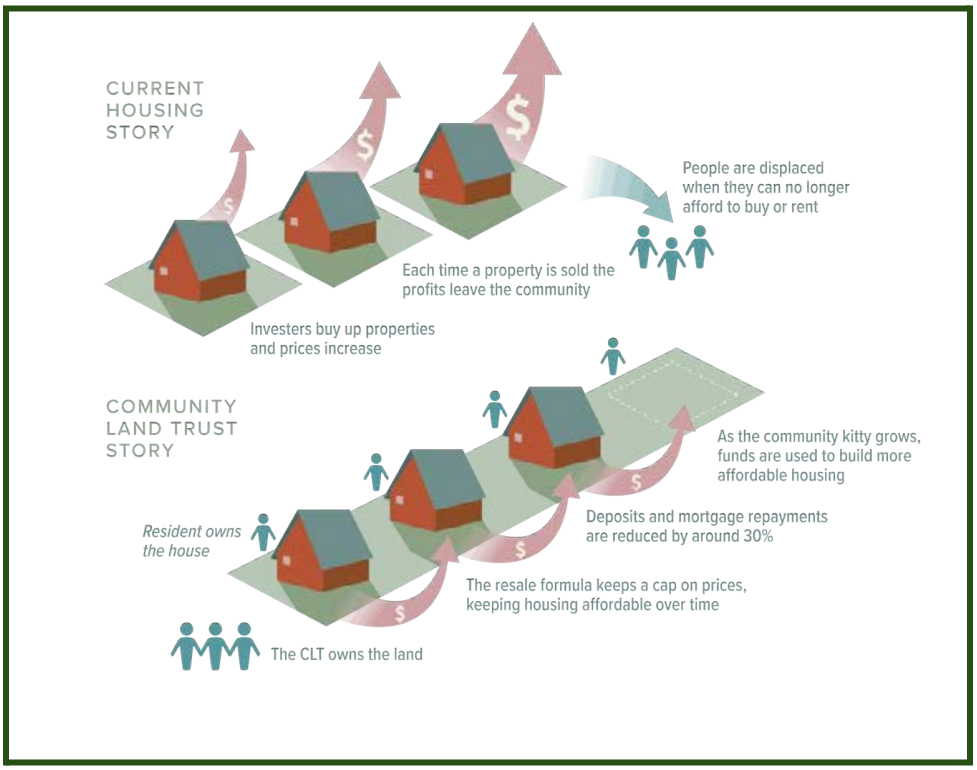


Image: Grounded

- Deliver value for money: CLTs and community-led homes that receive public investment of land or capital have been shown to deliver $1.8 of benefit for every $1 invested, rising to $2.70 when health, wellbeing and income distribution benefits are factored in. This increases to $3.10 over 30 years. **CLTs deliver a significant 3:1 return on investment in the UK when health, wellbeing and income distribution benefits are factored in over 30 years.**[6]
- Have been built to high environmental standards: With less spent on land costs, residents have greater budgetary scope for carbon emissions reduction and climate change preparedness. The UK experience has demonstrated that CLTs reduce CO2 emissions by 15-50%. Annual household energy costs were reduced by $260 – $1300 when measured against a typical UK house.[7]
- Are more resilient to downturns in the housing market: the U.S foreclosure rate for CLT homeowners was one-eighth the national average in 2010, and during the COVID-19 crisis, homeowners with market-based loans were over 8 times more likely to face delinquency and foreclosure than CLT homeowners.
- Reduce planning risk by countering NIMBYism: CLTs can often gain local support for new development where private developers fail.

[6] Colquhoun, C. Housing by the Community, For the Community, 2022
[7] Applegate, A. CLTS are Building Disaster-Resilient Neighborhoods, 2022

Part 1. How should Adelaide grow?



Image: GARP 2023

Current and future generations

Grounded commends the GARP's key focus areas upon housing availability & affordability, liveability, the climate crisis, ecological sustainability, food & water security, social inequality and indigenous reconciliation.

Not mentioned in the GARP is a tangible strategy for achieving long term intergenerational affordability of housing that enables a more equitable and socially cohesive place.

There needs to be a specific focus on improving outcomes for marginalised groups to ensure that housing development approaches do not inadvertently create additional intersectional disadvantages. Strategies to minimise negative impacts could include **actuarial accounting** to consider implications across a wider range of factors as well as the inclusion of **opportunity costs** and the **risk of non-action** in planning and feasibility decision making.

Currently the Australian housing market has transitioned from one where the sanctity of the family home was the basis of the property owning democracy to a scenario where now only those who own property can access the subsidies and privileges that land ownership delivers.

Whereas previously the private rental market was seen as a stepping stone between leaving the family home and entering home ownership as a young adult, the prevalence of lifelong renters is increasing. The market is not responding adequately to the need for long term, secure rentals and affordable home ownership alternatives.



Image: The Simpsons

The current situation for many can be summed up with this quote from a recent regional housing needs survey:

> *"The bank says I can't afford $850 a fortnight for a mortgage so I pay $1200 a fortnight in rent instead."*[8]

Housing affordability is already out of reach for the current generation of young people and the growing number of older solo households. The mainstream housing market cannot and will not respond to renter's and low to moderate income earners housing needs without adequate reforms. As long as it is more profitable and less restrictive to rent a property via AirBNB than as a long term rental, the market will choose the former. As long as governments continue to rely on FHOG type subsidies, the market will continue to inflate prices. New interventions are needed and community led housing solutions such as CLTs need to be prioritised.

Grounded encourages the GARP to adopt a 'seven generations'[9] approach to visioning the liveability of our cities well beyond the concerns of the next 30 years. The GARP should be planning for the housing needs,, environmental sustainability and liveability of our cities that will be experienced by our grandchildren's grandchildren.

[8] Housing Matters Action Group, 'Housing needs mapping survey', Anon quote, 2022
[9] https://en.wikipedia.org/wiki/Seven_generation_sustainability



Image: Grounded

Community led housing responds to local context

Community led housing (CLH) is an umbrella term for housing models that involve residents and communities having central roles in the development and ongoing management of housing.[10] Typically CLH focuses on affordability relative to local wages and wider social benefits such as social cohesion. CLH initiatives can respond effectively to local housing needs and often as part of their grassroots development tend to minimise NIMBY objections.

While CLH is able to respond effectively to localised housing needs, the criticisms from government and developers is that there can be a lack of scalability and/or replicability and an imbalance between the emphasis on community wellbeing and financial viability of potential projects. For this reason, we believe that CLTs provide the most suitable framework for community led housing because of the balance it provides in terms of a robust financial and legal structure while retaining the ability to adapt to local context and community priorities.[11]

The most effective housing outcomes for renters and those aspiring to home ownership will come as a result of effective collaboration between government, for purpose housing organisations and community led initiatives.

Community led housing can help to minimise the negative impacts of all types of development. Infill development can be obstructed by NIMBYism with existing residents unwilling to accept change and increased density. Brownfield developments, if left to the private market, are likely to deliver housing with the highest returns for developers, high end apartments for professionals and/or properties destined for short term holiday letting. These housing products are not conducive to the establishment of inclusive, equitable communities.

[10] What is community-led housing? - World Habitat (world-habitat.org)
[11] Crabtree et al Articulating value in cooperative housing International and methodological review

Similarly, greenfield developments run the risk of market manipulation through drip fed land supply strategies, urban sprawl, sleeper neighbourhoods and locational disadvantage. However, community led greenfield developments have an opportunity to mitigate many of these risks.

The Aldinga Arts Eco Village provides a worthy example. This village currently has 181 houses and has incorporated 'living locally' via shared community spaces, productive food gardens, environmental stewardship and collaborative decision making processes. The village is also located close to schools, services and major roads.[12]

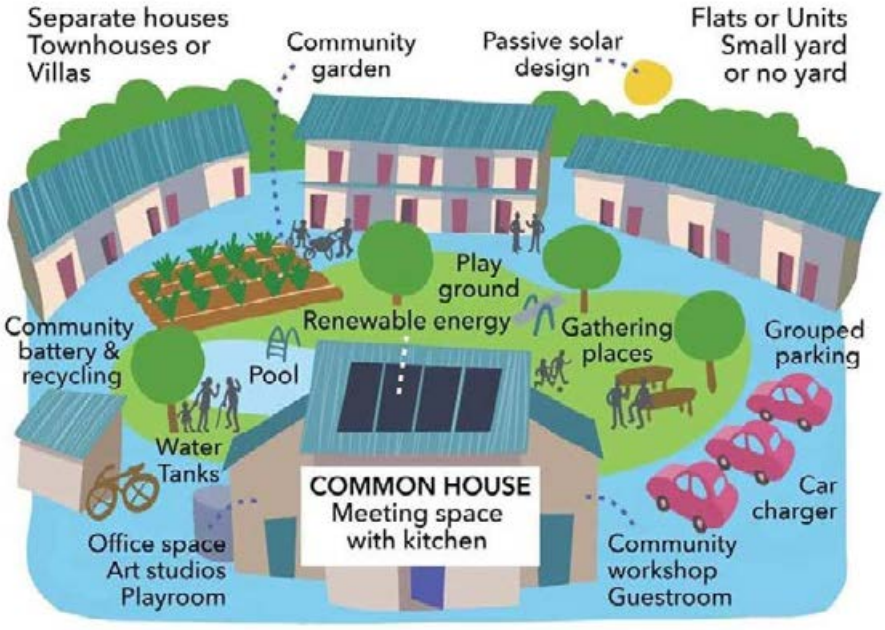


Image: Cohousing Australia

Involving community in the planning, managing and ongoing use of infrastructure can lead to better long term outcomes and usability.

The solution to traffic congestion is *not* wider roads or multi-million dollar freeways and tunnels that bisect communities. The answer is to restrict urban sprawl and the associated public transport deserts that force families into car dependency. More cost efficient (in terms of overall capital outlay) and better social and environmental outcomes can be derived from **high quality eco-friendly medium density urban infill**, particularly modern micro villages.
Combining state leadership with localised community activation could have significant benefit in terms of mitigating biodiversity loss and heat island risks. The commendable native vegetation guideline for roadside management for country areas and Green Adelaide's Urban Greening Strategy for metropolitan Adelaide, acknowledge that more urgent action is needed to restore urban biodiversity. 75,000 trees are being lost each year from Adelaide's tree canopy. This is a

[12] https://aldingaartsecovillage.com

critical biodiversity risk and heat island effect risk that puts costly strain on our health care system. There must be more stringent controls on loss of tree cover, much tougher penalties for wrong-doers and much more funding to LGAs to reinstate Adelaide's shade including support for community activation initiatives.

Housing SA has announced plans to increase development of 400+ new homes as per A Better Housing Future and the 1,000 Affordable Homes Initiative. Instead of landscaping the front gardens of new homes with introduced species, the contracted property developer could be required to landscape with indigenous plants recommended by Bringing Back the Butterflies. Simple community engagement strategies could be implemented to regenerate lost habitat for threatened species on publicly owned land, such as land managed by DTI and the Education Department, without any compromise to overall land usage.

The 'Missing Moderates'

Grounded is concerned the recent announcement of A Better Housing Future falls into similar tropes to troubled government interventions in other states. The removal of stamp duty discounts will result in less government revenue, with the savings used to bid prices higher The $650,000 threshold will have to be increased in two years. The FHB Grant will add to demand side pressures, requiring even greater FHB grants in the future.
With the housing crisis affecting young people, over 55's, solo parents and many families bearing the dual responsibilities of having to care for both their young children and their ageing parents, we have concern that this cascading of housing pressures is preventing this middle income cohort from gaining access to home ownership. These are solid citizens who earn too much to access subsidised housing options but are blocked from the security of home ownership due to the deposit gap and rising cost of living pressures.

The disappearance of affordable rental supply has created a deep fearfulness within the moderate income earning cohort. This is a cohort that had not experienced housing insecurity previously. Many are fearful that they are just one eviction notice away from homelessness.

CLTs are the ideal intervention to enable moderate income earners to achieve home ownership. CLTs help to stabilise local housing markets and ensure that essential workers have access to home ownership in suitable locations. Over time, **CLTs reduce the demand for social housing, homelessness services and affordable rentals**, ultimately reducing the cost burden on government**.**

Insights from other innovative building models

The Nightingale Housing model, the Assemble Futures model, the Property Collectives model, and the Sun Villages model have each demonstrated a triple bottom line approach to innovatively address the housing crisis. Each is to be highly commended for their environmental

sustainability credentials and willingness to place Human Centred Design at the centre of the innovation process. Nightingale and Assemble, in particular, have demonstrated that not-for-profit architect-led housing innovation can deliver outstanding results at scale.

However, the impacts of the financial component of these models do not go far enough to achieve long term affordability over successive generations. Highly credentialed eco-friendly homes within a modern micro village are highly sought after. The gentrification of the housing stock pushes up the median price for homes in the surrounding area, shutting out home ownership for essential worker cohorts.

Each of these models have been in existence for approximately a decade and longitudinal data is not yet available about long term affordability. Regrettably, the absence of effective resale covenants[13] for subsequent generations of buyers means that aspiring third, fourth and fifth generation buyers will have to be very affluent to be able to buy-in to such sort after eco-credentialed precincts.

As each of these innovative models mature and evolve, Grounded hopes that future projects will incorporate a CLT as the trustee of the land, whereby only the dwellings atop the land are bought and sold. In addition to the benefits of the modern micro village and eco-cred, a CLT would ensure:

1. The land component is permanently taken out of the calculation of the capital appreciation equation, thereby quelling inflationary house price pressures for the CLT dwellings and dwellings in the surrounding areas not covered by the CLT and,
2. A resale price calculation formula by means of a legally binding covenant is placed on the dwellings, permanently pegging the resale price of the dwellings to wages growth, thereby ensuring long term affordability for essential workers.

Establishing a CLT ecosystem in South Australia

With a ten year rollout plan, CLTs could follow a similar trajectory to the UK CLT housing experience. The UK Cohousing Network and Community Land Trust Network recently launched the 'Community Led Housing Growth Lab', a CLT and CLH accelerator to help the community led housing sector address the challenge of scale-up.[14]

In 2010, there were around 600 CLT homes in the UK, today that number is 1,711 with an additional 5,413 in the pipeline. BAccording to the latest research, there is potential for another 278,000 to be built.[15]

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[13] Nightingale has a covenant restricting resale to 15% of the median *detached home* in the locale. This will be much higher than an apartment due to the higher proportional site value.
[14] UK Cohousing, Unveiled: the Community Led Housing Growth Lab 2023
[15] Bowker, C. Community land trusts are the next social housing revolution: 'It's about empowering people', The Big Issue UK, 15th Oct. 2023



Image: UK Community Land Trusts Network

Grounded is collaborating with counterparts in the UK and USA to replicate the organisational structures and incubation processes to achieve similar transformative success in Australia.

Initially, the plan is to start with a small number of duplicatable pilot projects that will identify and work through any planning, legal and financial barriers. In years 3 - 5, with a model that is building in confidence, in conjunction with the rollout of a national CLT Start Up Fund with Housing Australia and a panel of impact investors and CLT specific financial instruments will enable the sector to grow to help fill the current gap between private rental and home ownership.



Image: Older Women's Co-Housing London

Trends and drivers

For too long, housing and infrastructure (and politics) has been dominated by voices representing those that are likely to profit most from any decisions. The most effective way to plan and adapt is to ensure that land use plans and decisions are considered from a much wider perspective and include potential impact on future generations.

Key considerations for land use planning should include:

- Reconciliation with First Nations
- Recognition that land ownership enjoys monopoly power
- Intersectional disadvantage
- Gender lens
- Locational disadvantage
- Climate change, including impact of extreme heat
- Increased risks of natural hazard and emergency events
- Food production and biodiversity collapse
- Building resilience to external shocks - e.g. supply chain impacts exposed during COVID
- Transport - reducing reliance on fossil fuels and building in active transport infrastructure
- Health & wellbeing

Better use of government subsidies

Grounded calls for individualised subsidies, such as the state and federal First Home Owner Grants and the state based Stamp Duty Relief for Eligible First Home Buyers **to be redirected into the establishment of a financially sustainable CLT housing sector.** This has the potential to save money in the medium term and deliver genuinely affordable housing for generations to come.

Rather than the ever increasing need for government subsidies for individuals to enter into home private ownership, **the provision of government funding to CLTs quells broader house prices as the CLT sector matures.** As demonstrated by Swedish public housings growth, an initial post war investment has enabled the ongoing delivery of homes that meet community needs.[16] Sweden's innovative Sveriges Allmannytta provides 30% of rental housing where security of tenure is guaranteed.[17] Such a rollout could facilitate a more targeted approach to improve rates of home ownership among the 25 - 45 age group and help older single women avoid the perils of homelessness and housing insecurity.

Grounded calls upon the GARP to **proactively enable the development of a community led housing ecosystem strategy** for achieving long term intergenerational affordability of housing and a more equitable and socially cohesive place.

Delivering greater choice across housing types and locations

With major developers often acting in concert to ensure higher prices, we need genuine competition in the housing market.[18] Government also needs to intervene in the housing market where the market cannot and will not respond to housing needs. This includes supporting approaches that foster emergent housing models, alleviate the demand for social housing, and find the delicate balance between housing and food production on arable land.

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[16] Sveriges Allmannytta, Public Housing in Sweden
[17] ibid
[18] Power Housing Prospectus & Capacity Report

Fostering new ecosystems

To ensure that GARP contributes to building a strong, smart, cleaner, regenerative economy, Grounded recommends greater support should be provided to emergent market ecosystems, including the affordable housing, impact investment and social enterprise ecosystems. This must be undertaken in the same innovative manner that the tech ecosystem was given a major boost through the creation of the enormously successful Lot 14 precinct.

Grounded recommends that the **South Australian government and Housing Australia create a funding pathway for CLT pilot projects.** We need Housing Australia and entities such as HomeStart Finance to facilitate the creation of a mortgage instrument that can be used by residents to buy into a community led CLT project. The funding pathways will start small, but with a perpetually affordable focus there is no reason it could not grow over decades to a similar size of Sweden's.

Importantly, any widening of the affordable housing mandate should ensure that any future sales have **an affordability lock**. This means that the CLT places a legal covenant on the sales price such that prices could not increase faster than the median wage growth for the area.

The paucity of remaining public land should be channelled towards housing organisations that have **for-purpose housing as their primary aim**. Government should refrain from succumbing to pressure from private for-profit property developers, as was seen in previous land releases, most notably Mount Barker. [19]

The pressures caused by continual vertical-fiscal imbalance means that local councils in particular are under pressure to sell their scarce remaining public sites. Instead of selling these sites, councils and governments of any jurisdiction should consider a CLT leasehold system. Associated land rents could be returned to the public coffers whilst assisting the debt profile of a CLH project. If the financial pressure is too great on government, such sites should be first offered for sale to for-purpose development such as CLH or CHO's under a vendor finance agreement.

During economic downturns, governments should not only prepare for a land buying spree to **rebuild the public land bank**, but also act to ensure that foreign investment is limited from arbitrage activities.

[19] InDaily 'Learn from Mount Barker': Govt warned on new Greater Adelaide plan.



Image: GARP 2023

Impact calculators / Actuarial accounting

Changing how we measure and value impact has the potential to provide better insights and guide future investments. The siloed nature of budgets across government departments fails to capture the true picture. The University of Melbourne School of Design has published a 28 page Affordable Housing Calculator Manual.

The newly announced Social Infrastructure and Green Measures for Affordable Housing (SIGMAH) calculator developed by the Centre for Urban Transitions at Swinburne University will provide valuable insights into opportunity cost modelling. In time, these calculators will provide an understanding of **how much less public expenditure a government will incur** from areas such as health, policing, and community services when homes are made available to those who need them. The calculator will also provide monetary estimates of greenhouse gas and environmental benefits from provision of green spaces, dwelling designs and access to transport options and measures the dollar value of lower CO2 estimates due to the energy performance of new dwellings.'[20]

Housing must be seen as an investment in social infrastructure that underpins broader economic prosperity, not the reverse.

[20] Australian Property Journal Social housing will deliver $16.2bn cost-of-living relief

Alleviating demand for social housing

The current emphasis on key worker housing for health, education and policing employees reflects a recognition that without suitable housing there are flow-on impacts for government's ability to deliver essential services. This equally applies to other employment sectors, particularly low to moderate income earners such as aged care, child care, welfare and disability services, transport, retail and hospitality. These missing moderate workers are on a knife edge in the current housing market. If they are renters, they may be one rent increase away from unaffordability and / or homelessness. If they are forced to move, they may not be able to find another rental to remain in the area, with flow on effects for their school age children, community connections, employment and further education. If they are not already in the home ownership market, the likelihood of being able to save enough deposit has all but disappeared.

There are many stories of unexpected homelessness; people who 'never thought homelessness would happen to them'. The classic example in recent media coverage is a woman in her 50s who through divorce, illness or unemployment has suddenly found herself homeless - unable to compete in either the private rental or home ownership markets.[21] **This 'slide' into homelessness will continue to create growing demand for social housing unless alternative stabilising housing models are developed that can fill the gaps.** Once a person becomes homeless their needs of ongoing and complex escalates sharpley. The trauma impacts of homelessness linger for many months well beyond the point when the person has secured stable housing again.

There are calls for a return to the post WWII government led housing builds. The example of Housing Trust SA building whole neighbourhoods of worker housing to support the car manufacturing industry is a powerful example. The Housing Trust SA development of worker housing meant that the rental returns produced an economically viable and stable housing model. It ensured that industry had a supply of stable housed workers, well located housing was available near employment opportunities and that the housing costs were relevant to local wages.[22]

While there is merit in these suggestions, it is more relevant to consider how government can achieve the desired impacts that these approaches were able to deliver; namely financially viable, well-located housing for specific cohorts that supported economic development relevant to local wages, in a way that is reflective of the current political and economic environment.

Supporting small scale food producers

A greater balance between the preference for regional hobby farms over affordable farming should be investigated with the potential for local councils to allow Rural Exception Sites, as per in the UK.[23] **Affordable dwelling pods of 3-4 homes** on farming cooperatives should be

[21] Hamilton-Smith, L. Experts say Solving the Housing Crisis Could Take Decades, 2023
[22] Jacobin The Government Can Build Quality Housing for Everyone
[23] UK government, Housing Needs of Different Groups, 2021

encouraged to ensure farm based labour has a long term commitment to the land. Permaculture principles allow small scale farming to be more productive.

With greater off-grid capacity provided by solar, water and septics now possible, the strains on local council resources have reduced. This could enable greater food security with affordable farm pods helping to reinvigorate the demographic potential of regions. Such planning permissions could be limited to a few kilometres from an arterial road.

Part 2. Where should Adelaide grow?

Curb greenfield development

The Land Supply Report For Greater Adelaide suggests that greater Adelaide land mass area will increase by approximately 20% in 20 years. If this rate of land consumption continues, by 2085 greater Adelaide would have consumed land well beyond Two Wells and Roseworthy. Added pressure around Mount Barker, Murray Bridge, Victor Harbour and Goolwa would see devastating amounts of valuable arable land permanently lost to housing development.

Greenfield growth on the edges of established urban areas, ie urban sprawl, brings with it numerous disadvantages to residents, the broader community and substantial long term costs to taxpayers, including:

- Exacerbation of the drivers of Climate Change. The Interconnected Disaster Risks report 2023 finds that the world is fast approaching risk tipping points on multiple fronts. Biodiversity loss
- Unsustainable growth pattern in terms of 'seven generations thinking'
- Loss of arable land and subsequent threats to food security
- The risk of natural disasters are greater on the urban fringe
- Very high cost of infrastructure provision
- High ongoing costs of services provision due to absence of economies of scale
- Inflationary pressures that new land subdivisions place upon the housing market
- Ongoing car dependency
- Low walkability index and low Active Transport potential
- Higher transport costs => higher overall costs of living, disproportionately impacting low income families
- Exacerbates economic disadvantages experienced by women who have caregiving responsibilities caring for children &/or elderly family members, particularly in 'child care deserts'
- Increased health care costs due to worsening loneliness is exacerbated within typically atomised households of greenfield developments
- Monetisation of excessive commute times entrenches disadvantage, and reduces family wellbeing
- Distance from employment opportunities, extended family, and community services exacerbates socioeconomic disadvantage and isolation
- Destruction of indigenous heritage sites, impairing the process of Reconciliation. Notably, the recent discovery of indigenous human remains at the Riverlea greenfield development
- Difficulty in attracting professional services (eg GPs, dentists, etc) to outer urban fringes
- Low population density is unviable for taxis / rideshare
- Negative impact on tourism desirability vs compact neighbourhoods which are highly attractive to tourists

The broader costs of Greenfield development is enormous. Greenfield growth areas are not in proximity to jobs, services, existing transport or walking distance of community facilities, nor do they reduce the need for car travel. [24]'Around 60 percent of Mount Barker council's population commutes to the city every day, said Voortman, who argued this strengthens the case for a greater focus on infill.[25] This is contrary to the GARP's aspirational emphasis of Living Locally.

[24] Infrastructure Victoria Strategic Engagement Report 2023
[25] InDaily Learn from Mount Barker': Govt warned on new Greater Adelaide plan

Notably, Melbourne's most liveable suburbs aren't in the CBD or the outer fringe. 'The best-performing local government areas tended to be older with mature trees and local strip shops and services, while the worst-performing were outer suburban areas with rapidly growing greenfield developments and often lagging infrastructure.'

These are suburbs where the planning was performed by government, rather than profit driven developers in 'master-planned communities'.

Grounded cannot support the creation of greenfield developments on the urban fringe that perpetuate the issues we are already experiencing in the current housing system. The mass produced, developer led greenfield developments are increasing our vulnerability in relation to affordability, climate change, biodiversity loss, food production, isolation, community stratification and locational disadvantage.

While there may be many lifestyle benefits of 'a country life' in a greenfield development, the drawbacks outweigh the benefits. Young families and first home buyers are often forced to the outer fringes for lack of other affordable choices, wherethere is a false economy in living a large distance from employment opportunities.

Similarly, when applying a gender lens, greenfield developments have a disproportionately adverse effect upon women who have concurrent work commitments and caregiving responsibilities. Greenfield developments are often childcare deserts, preventing women returning to the workforce in a capacity of their choosing.[26] Further, often there are few high paying roles available locally. Invariably, women have little choice but to take on roles that are part time, low paid, and may have limited career advancement opportunities. These factors exacerbate the stubborn national gender pay gap and gender retirement savings gap. Greenfield developments have real world consequences, exacerbating pervasive financial and housing vulnerabilities faced by increasing numbers of women.

The GARP should curb greenfield development and **provide extensive oversight of Minimum Viable Supply Rates** (see below). Greenfield development should be limited and seen as a last resort only.

[26] Western Sydney University The Future of Work and Childcare

Quality infill development



Image: Bowden, Renewal SA

Growth should be prioritised around quality urban infill development and a focus on medium and higher density TOD. There should be ambitious requirements for any brownfield development to leverage maximum opportunity for long term affordability and amenity housing outcomes that transition to living locally and proactively working to adapt to the changing climate.

Redevelopment of Housing SA properties that are no longer fit for purpose should be prioritised. These sites should be fast tracked to achieve greater density of social and affordable housing along TODs. Importantly, a CLT model can ensure that the public site remains entirely focused on affordable outcomes, rather than a subset of a market orientated development.

Any infrastructure hub (e.g. train station) that creates new land titles (i.e. the removal of a level crossing) should incorporate CLTs as a perpetually affordable housing outcome that maximises ROI for the government.

Any 'priority development zones', as recently floated in NSW, need to **include significant proportions of for-purpose housing that have an affordability lock in place**. Developers should be required to abide by certain supply outcomes to qualify for the project, i.e. complete project selloff in 12 years, not 25 - 30 and that housing remains affordable for future generations not just the initial residents.

Grounded commends the recent work by Cohousing Australia to the 2023 Tasmanian Housing Strategy highlighting how cohousing and community led housing could act as a key mechanism for the GARP to achieve high quality urban infill and the key objectives of Living Locally.

Land banking

Aside from the social and environmental drawbacks of greenfield development, government must also be realistic about market manipulation in greenfield developments. Most concerning is that the market power of developers is largely unchecked. Private land banking must be deterred.

Continued focus on faster planning approval times acts to distract from the scarcity engineering. Market conditions are the most important supply determinant.[27] If prices are rising, supply will increase. If not, supply will stagnate. This is the fundamental contradiction at the heart of the trickle down supply argument. Without recognising this, best practice housing policy suffers. Policy continues to rely too heavily on market forces that are tilted to favour economic rents over affordability.

Oversight must be provided to ensure a Minimum Viable Supply Rate is maintained by developers - delivering an average 5% supply of total lots p.a over three years. An escalating land tax should be applied on land banks that aren't meeting the 5% supply rate.

Conclusion

As we face increasing challenges and uncertainty with climate change, the need to prioritise community wellbeing and our capacity to adapt also increases. We encourage GARP to be bold and innovative. We encourage GARP to position community and future generations ahead of those lobbying for short term commercial gain.

We believe that investing in housing models that provide perpetual affordability and long term community benefit should be prioritised. The commitment that the South Australian government has demonstrated to supporting the establishment of various ecosystems such as the Tonsley Innovation Precinct, the Bowden redevelopment and tech focused Lot 14, should be expanded to include community led housing and CLTs. This would position South Australia as a leader in pioneering new pathways forward.

Rather than repeat the points we've already made, we will conclude with some questions for further consideration:

- Will the government make better use of the levers available to it to limit private land banking and profiteering?
- What infrastructure is needed to foster a thriving ecosystem for impact investment?

[27] Rowley, S., Leishman, C., Olatunji, O., Zuo, J. and Crowe, A. (2022) Understanding how policy settings affect developer decisions, 2022

- How could community led housing initiatives create a self sustainable affordable housing ecosystem that can continue to adapt to community needs and emergent challenges?
- Who is missing from decision making tables and how can they be better included?
- What will be the intersectional implications for vulnerable groups?
- What will our grandchildren's grandchildren think of our decisions and the legacy we are leaving them?

Grounded calls for a visionary government agenda to champion CLTs. Coupled with philanthropy, impact investment and tailored mortgage instruments for residents, CLTs and community led housing projects could become the preferred vehicle by which the progressive aspirations of the GARP are materialised in South Australia.


Grounded
Community Land Trust Advocacy
A pathway to housing affordability

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Saturday, 4 November 2023 11:07 AM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: 20230315_Homes-for-Homes_Intro-for-developers.pdf; 20221213_Tea-Tree-Gully-Council-and-Homes-for-Homes.pdf; 20230207_Homes-for-Homes-and-the-City-of-Marion.pdf; 20230214_Homes-for-Homes_City-of-Onkaparinga.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Other
Given name:	Sally
Family name:	Curtis
Organisation:	Homes for Homes
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Homes for Homes creates new funding streams to increase the supply of social and affordable housing for those in need across Australia. We do this through the sale and resale or lease of properties. We are on track to raise $ 1 billion by 2050. Partnering with the property sector is crucial in the South Australian marketplace. We are a proven model, a whole community, government, and council solution. It works. See our success to date below. Overview At Homes for Homes, our mission is to address the pressing issue of homelessness by increasing the supply of social and affordable housing. We firmly believe that collaborations and partnerships with developers and critical organisations can make a substantial difference in solving the housing crisis. Homes for Homes is a simple way for the property sector to make a substantial impact at no cost. Developments play a central role in their surrounding neighbourhoods and have the power to contribute to advancing the economic, environmental and social well-being of communities. With purchasers increasingly looking for developments that achieve both environmental and social sustainability outcomes, partnering with Homes for Homes can demonstrate to home buyers how purchasing a participating property can positively change the lives of marginalised and disadvantaged people in Australia over future generations. We can amplify our collective impact in addressing homelessness here in SA. The Back Story: The Big Issue CEO, Steven Persson, learnt of a forward-thinking developer in the USA, Lennar, who had found a way to address homelessness by raising funds through the sale and resale of properties. It was an ingenious plan, and its potential is enormous. Inspired, The Big Issue set about tailoring the initiative so the entire community could link arms on scale here in Australia. It is a simple way for the property sector to impact at no cost substantially. By: · Raising new private capital via donations on propert
Attachment 1:	20230315_Homes-for-Homes_Intro-for-developers.pdf, type application/pdf, 1.0 MB
Attachment 2:	20221213_Tea-Tree-Gully-Council-and-Homes-for-Homes.pdf, type application/pdf, 4.1 MB
Attachment 3:	20230207_Homes-for-Homes-and-the-City-of-Marion.pdf, type application/pdf, 205.2 KB
Attachment 4:	20230214_Homes-for-Homes_City-of-Onkaparinga.pdf, type application/pdf, 493.2 KB
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Homes for Homes

Created by THE BIG ISSUE



Homes for Homes granted $300,000 to Community Housing Canberra which will see the development of a group home to enable people with mental illness to transition from living with ageing parents, to a more independent model with 24/7 support. (Grant round 2, 2020 Page, ACT)

A promise to end homelessness

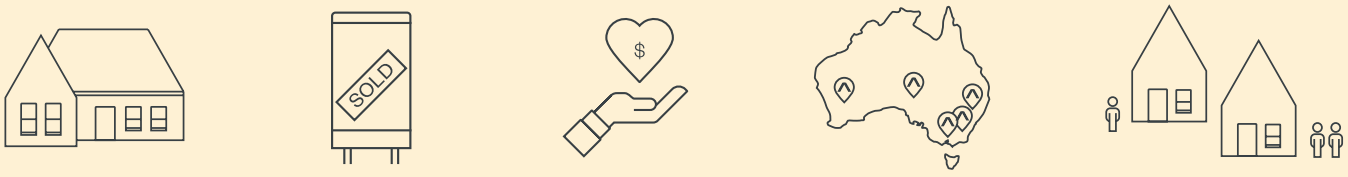
All people have a right to secure and safe housing, yet Australia has 116,000 people experiencing homelessness, a chronic shortage of 600,000 homes and more than 1.5 million households living in housing stress. The flow on effects make this one of Australia's biggest social issues.

Homes for Homes is an innovative funding model to increase the supply of social and affordable housing

Here's how it works:

- Property owners agree to make a voluntary tax deductible donation to Homes for Homes when they sell their property. The donation is the equivalent of 0.1% of the property's sale price (a donation of 0.1% on a $750,000 property = $750).
- When a property is registered with Homes for Homes we add a caveat to the title. The caveat simply acts as a gentle reminder of the promise to donate when the owner decides to sell.
- The property remains registered with Homes for Homes indefinitely, encouraging all future property owners to make a donation when they sell their property.
- Homes for Homes is voluntary. At any time the property owner can choose to withdraw their property from Homes for Homes.
- Renters can participate by donating 0.1% of their monthly rent to Homes for Homes (0.1% of $2000 monthly rent = $2 monthly donation).

Homes for Homes is a long-term, sustainable solution to homelessness:



1. Homes registered
2. Properties sold
3. Funds donated
4. Money distributed
5. Homes created

Funds raised will benefit all

Homes for Homes is a new source of funding, not a builder. Donations raised are granted to experienced organisations that specialise in creating social and affordable housing.

When sufficient funds have been raised in a state or territory, registered organisations will be invited to submit funding applications for projects in that state or territory.

Grant proposals will be reviewed against published funding guidelines by specialist investment and state/territory specific housing advisory groups and the Homes for Homes board, with the objective of maximising benefits from funds invested.

Homes for Homes is on track to raise over $1 billion of new funding over the next 30 years.

Created for Australia

The Homes for Homes model is based on a similar, successful program operated by Lennar, one of America's largest home builders.

Developed from learnings from the Lennar model, Homes for Homes has been established in Australia by The Big Issue, an independent not-for-profit social enterprise that provides sustainable solutions to assist Australians experiencing homelessness and disadvantage to earn an income and build their capacity to help themselves.

An invitation to participate

Developers and builders have a unique opportunity to make a significant contribution to Homes for Homes – 35+ developers have registered projects with Homes for Homes, including: Mirvac, Balcon, Capital Airport Group, Hip V. Hype, Development Victoria, LWP Property Group and ICD Property. For a full list of participating projects, visit our website homesforhomes.org.au.

Homes for Homes can apply to both residential and commercial (office, rental and industrial) properties.

For the residential market, housing stock is registered with Homes for Homes before selling to homeowners or other property stakeholders. This encourages all future homeowners to make a donation to Homes for Homes when they sell their property (unless, at any time the homeowner chooses to withdraw from Homes for Homes).

For commercial properties, Homes for Homes can apply to both sales and leases.

Building initiatives that participate in Homes for Homes can apply to the Green Building Council of Australia for up to two Green Star rating points as part of the Social Enterprise for Affordable Housing Innovation Challenge.

We invite you to join us on this journey

enquiries@homesforhomes.org.au or call 03 9553 4533

Homes for Homes has granted over $1.4 million to 17 social and affordable housing projects creating housing for more than 300 people.

The more properties that register with us, the more funding we'll be able to grant and the number of social and affordable dwellings will increase.

More homes means less homelessness.

Stay connected

- homesforhomes.org.au
- @homesforhomesaustralia
- @homesforhomesaustralia
- @Homes for Homes

Governance

Homes for Homes is committed to robust, independent governance and is advised by expert independent industry based investment and housing advisory groups to maximise the benefits from funds raised.

Board

- Adam Brooks, Partner, Thomson Geer
- Sonya Clancy (Chairman), Chief People Officer, Bank Australia
- Wendy Fromhold, Director, WFConsulting
- Paul Kearney, CEO and Founder, Kearney Group/Oi Software
- Steven Münchenberg, Managing Partner and CEO, Blackhall and Pearl
- Carolyn Viney, Chief Development Officer, Vicinity Centres

Investment Advisory Group

- The Hon Anna Bligh AC, CEO, Australian Banking Association
- Terry Campbell AO, Senior Chairman, Goldman Sachs
- Sonya Clancy, Chief People Officer, Bank Australia
- Sally Herman, Non-Executive Director
- Glenn King, CEO, PEXA
- Simon McKeon AO, Chancellor, Monash University
- Peggy O'Neal AO, Chancellor, RMIT
- Andrew Penn, Former CEO, Telstra
- Ian Smith AM, Managing Partner, Bespoke Approach

Industry partners

Australian Banking Association · Clayton Utz · Corrs Chambers Westgarth · Dye & Durham · Green Building Council Australia · Herbert Smith Freehills · King & Wood Mallesons 金杜律师事务所 · MinterEllison · NSW Land Registry Services · PEXA · Property Council of Australia · Urban Development Institute of Australia

Why be involved?

Homes for Homes is a simple way to make a substantial impact at no cost

Registering your development with Homes for Homes demonstrates that you are taking a leading position on boosting the funding that flows to create new social and affordable housing stock in Australia. It's a clear signal that you take corporate social responsibility seriously.

It's an easy initiative to be involved in that requires no upfront investment on your behalf. Homes for Homes has robust governance and the backing of the legal, financial and property sectors.

People are becoming more socially conscious

Now more than ever, business leaders see social sustainability as crucial to competitiveness. While environmental sustainability has been top of mind in the property industry for well over a decade, the long-overdue spotlight has now turned to social sustainability.

It is well understood that home buyers want — and will pay more for — sustainable features. As younger generations are expected to enter the home buying market, this socially conscious group are looking for more than just green features, they are also looking for properties that are socially sustainable.

Now is the time to embrace social responsibility

Social impact can be measured by a development's contribution to the community. Well-managed properties are becoming important philanthropic contributors to their surrounding communities with thoughtful and targeted programs that address local challenges.

Partnering with Homes for Homes will allow you to demonstrate to home buyers how purchasing a participating property can positively change the lives of marginalised and disadvantaged people in Australia over future generations.

It is the right thing to do

Developers can prioritise social sustainable property features to positively impact the community and stand out to future homeowners.

Developments play a central role in their surrounding neighbourhoods and have the power to contribute to advancing the economic, environmental and social well-being of communities.

Property for purpose

Homes for Homes is a proven model, and with the support of industry, together we can:

- enable a whole of community led solution.
- make housing more affordable.
- solve homelessness.



Otello (South Australia) have registered their Mile End development with Homes for Homes.

Property partners

alt LIVING CO
ANGLICARE SA
Assemble
Balcon GROUP
Barrio
CAPITAL AIRPORT GROUP
COMMUNITY HOUSING LTD GROUP OF COMPANIES
cook BUILDING CREATING FUTURES
DEVELOPMENT VICTORIA
DevelopmentWA
EASTCOURT LIVING
ellenbrook a full life
Grocon
Habitat for Humanity Victoria
haven HOME. SAFE
HIP V. HYPE
home
ICD
JINDING
Junction
LOWE | LIVING
lucent™
mainstone™ INVESTMENT & DEVELOPMENT
Mayfair Homes
Milieu
mirvac
MOLONGLO
NAPCO PROPERTY GROUP
ōtello
Pacific Link HOUSING
piccolo
PRIME EQUITY GROUP
PROJECT INDEPENDENCE
QATTRO
Setia
SJDhomes
THE BARNETT FOUNDATION
TOGA
WELLSTONE



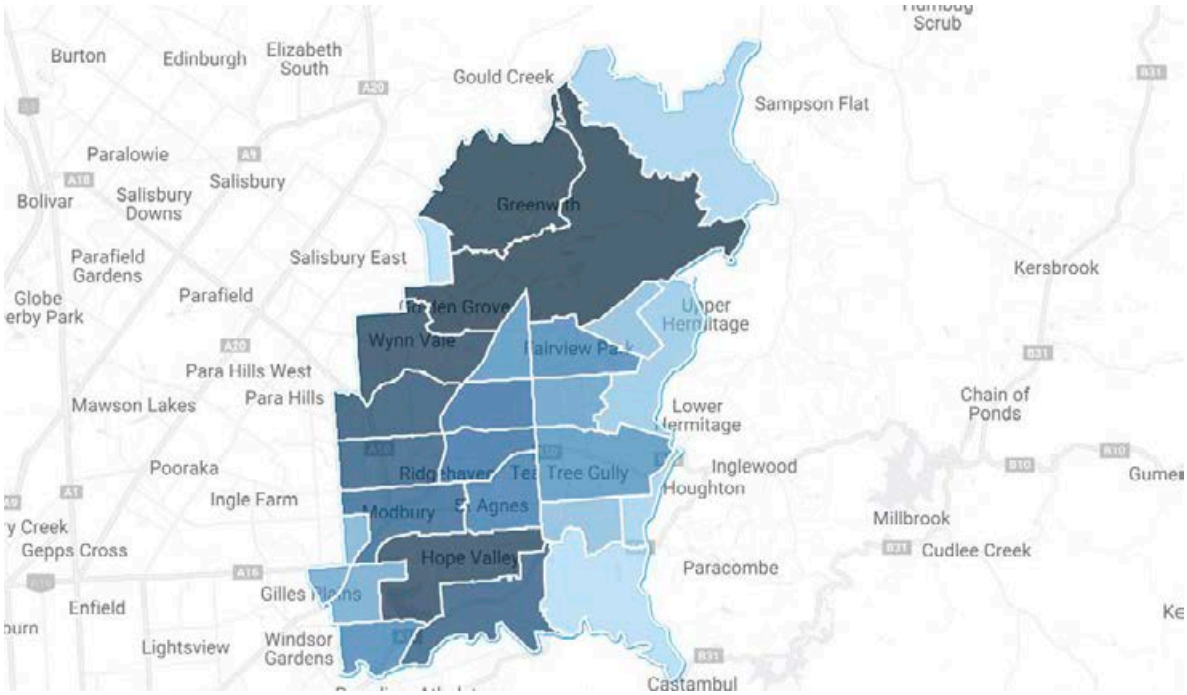
Homes for Homes and Tea Tree Gully Council

December 2022

Homes for Homes

Created by THE BIG ISSUE

Contact Sally Curtis, Partnerships Manager Homes for Homes
T: 0429 263 525 E: scurtis@homesforhomes.org.au
www.homesforhomes.org.au ABN 26 143 151 544



Executive summary

This report provides an analysis and evaluation of the current housing and population demographics of the Tea Tree Gully City Council and the potential donation value from property participation in Homes for Homes.

This report has been prepared using data from the 2016 Census, housing.id.com.au/adelaide, CoreLogic, realestate.com.au and remplan.com.

Results of this analysis show the Tea Tree Gully City Council can have a significant impact on increasing the supply of social and affordable housing by supporting Homes for Homes. For instance:

- If Homes for Homes were registered on all new dwellings approved by the Tea Tree Gully City Council every year for the next 30 years, using FY21 approval numbers, there is the potential to raise over $22.5m by 2050 through property donations to increase the supply of social and affordable housing.
- In addition, a further $4m could be raised by 2050 if 5% of existing dwellings donated to Homes for Homes when sold within the Tea Tree Gully City Council (refer Appendix 1).

The following pages provide a background on the Homes for Homes solution.

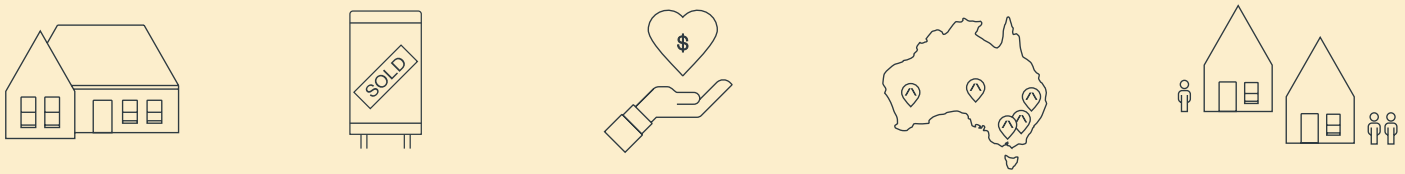
Homes for Homes

We believe all people have the right to safe and secure accommodation, yet 116,000 people in Australia are homeless each night and the country has a shortage of more than 600,000 homes (forecast to exceed one million by 2036).

The flow-on effects make this one of Australia's most significant social issues, one which government is unable to solve alone. In response, The Big Issue established Homes for Homes to provide a way for the whole community to work together to solve homelessness.

Homes for Homes is an innovative new funding model that will increase the supply of social and affordable housing.

Here' s how it works:



1. Homes registered
2. Properties sold
3. Funds donated
4. Money distributed
5. Homes created

Property owners agree to make a voluntary, tax-deductible donation to Homes for Homes when they sell their property. The donation is equivalent to 0.1% of the property's sale price (a donation of 0.1% on a $500,000 property = $500).

- The offer to donate to Homes for Homes is registered on the property's title by way of a caveat. The caveat simply acts as a reminder to donate at settlement time.
- The property remains registered with Homes for Homes indefinitely, encouraging all future property owners to donate when they sell their property.
- Homes for Homes is voluntary. At any time, the property owner can choose to withdraw their property from Homes for Homes.

Developers and builders' involvement

Partnering with Homes for Homes allows developers and builders to make a significant difference to Australia's social and affordable housing crisis.

Development projects can be pre-registered with Homes for Homes before being sold to homeowners or other property stakeholders. Pre-registration enables future owners to donate to Homes for Homes when they sell their property. Homes for Homes is included in the special conditions of the contract of sale and the developer's marketing material.

Creating housing

Once sufficient funds have been donated, Homes for Homes opens a grant funding round. Housing providers can apply for the funds, their applications are assessed by independent state-based Housing Advisory Groups.

Given the high potential for development projects to take place within the Tea Tree Gully City Council, we understand there may be a desire to ensure monies raised within the Tea Tree Gully City Council are invested back into the local community, consequently, we are open to establishing a specific Tea Tree Gully City Council Housing Advisory Group.

The group would be responsible for identifying and assessing the best options to increase the supply of social and affordable housing in the Tea Tree Gully City Council area utilising the funds raised from any landowner/developer contributions. Following this, ongoing contributions from individual homeowners would revert to the purview of the Victorian state-based Housing Advisory Group.

Tea Tree Gully City Council – demographic snapshot

The City of Tea Tree Gully is located in the Mount Lofty Ranges foothills in north-eastern Adelaide, South Australia. With boundaries 9 to 25 km from Adelaide CBD, the City of Tea Tree Gully supports 102,067 residents with the average age of 42, comprising of 40,000 households.

With a footprint of approximately 100 square kilometres, the City of Tea Tree Gully is comprised of 27 entire and part suburbs.

At the time of the 2016 Census, the median mortgage repayment in Tea Tree Gully was $1,517, with weekly household income of $1389, and for those renting the median weekly rental price was $300.

Real estate in the area displays consistently affordable prices, solid rental yields and strong price growth. Spacious family homes, large blocks and modern living are accessible in this evolving area.

According to CoreLogic National Market Trends in May 2022, the suburbs with the highest median house prices in the Tea Tree Gully Council are listed in the table below.

Suburb	Median sell price
Banksia Park	$539,500
Dernancourt	$561,500
Fairview Park	$505,000
Golden Grove	$605,000
Greenwith	$532,500
Highbury	$613,000
Holden Hill	$502,750
Hope Valley	$510,000
Modbury	$475,000
Modbury Heights	$512,500
Modbury North	$492,500
Redwood Park	$500,000
Ridgehaven	$491,000
St Agnes	$519,000
Surrey Downs	$475,000
Tea Tree Gully	$552,500
Vista	$499,500
Wynn Vale	$524,000



This four unit development by Women's Property Initiatives will house older single women who have assets that render them ineligible for social housing and with a limited income that prevents them for accessing a mortgage or owning a home of their own. These women often have to rent in the private rental market where their savings are rapidly depleted. This type of housing safeguards women from the threat of homelessness.

(2018 grant round, Beaconsfield, VIC)

Homes for Homes grant funding

During Homes for Homes grant funding rounds, we welcome any social and affordable housing provider to present us with projects for consideration. There is no pre-determined type of project that we choose to fund. Homes for Homes takes a flexible approach to the projects it supports and is open to considering any organisation, and indeed, any project that creates social and affordable housing.

Homes for Homes has granted over $1.4m toward a diverse portfolio of 17 projects in only a few short years. Funds have been granted across VIC, ACT, NT, WA, NSW and QLD.

Grant funds will help to create housing for a range of people in need, including families living in housing stress, women over 55 escaping family violence, affordable tenancies for people in Aboriginal communities and people with mental illness cared for by aging parents. These projects are in regional and metropolitan locations around Australia including Shepparton, Yea, Box Hill, Darwin, Townsville, Beaconsfield, St Kilda and Canberra. You can read more about all our funded projects at www.homesforhomes.org.au/funded-projects.

Because homelessness impacts many people in different ways, we look to fund projects that support the diverse range of people experiencing homelessness. In deciding how to disburse funding, our expert Housing Advisory Groups advise on the best projects to fund, based on the greatest housing need and which projects will make the most impact.

When a grant funding round opens in a specific state or territory, funding applicants present us with projects in that jurisdiction. We are open to applicants applying for all or part of the available funds. In previous funding rounds, recipients have applied for as little as $20,000 and as much as $300,000 toward a project. In % terms, Homes for Homes has funded 0.6% of a large (approx. $20 million) project and 40% of a smaller project which demonstrates our flexible approach to grant funding.

Homes for Homes is committed to providing a solution to one of Australia's biggest social issues – the chronic lack of social and affordable housing. With the support of property owners and developers, donations will flow to Homes for Homes to increase housing supply, and ultimately, end homelessness.

Homes for Homes is already having a big impact. We have granted over $1.4m to 17 projects which will create housing for 293 people.



If Homes for Homes were registered on all new dwellings approved by the Tea Tree Gully City Council every year for the next 30 years, using FY21 approval numbers, there is the potential to raise over $22.5m by 2050 through property donations to increase the supply of social and affordable housing and, in addition, a further $4m could be raised by 2050 if 5% of existing dwellings donated to Homes for Homes when sold within the Tea Tree Gully City Council (refer Appendix 1).

Working together

Recently several Melbourne developments included Homes for Homes in their planning permit application, with Homes for Homes working closely with the developers and planners to achieve a positive social outcome. In fact, Homes for Homes was included in the planning permit issued for 111-125 A'Beckett St Melbourne as a public benefit between the City of Melbourne and developer SP Setia under a Section 173 agreement.

South Australian developers Barrio and Otello have registered Adelaide projects with Homes for Homes.

Councils are looking at different ways to support Homes for Homes either through providing uplift or fast-tracking for participating developers and by introducing Homes for Homes to their existing residents. Some councils are considering making Homes for Homes compulsory on all future planning permits. Including Bayside City Council who voted unanimously to do so and are now in the finial steps of actioning.

The registration with Homes for Homes would not compete with any existing Tea Tree Gully City Council policies, rather, it would run in parallel.

Homes for Homes would welcome the opportunity to continue discussions with Tea Tree Gully City Council to explore how we can work together to solve Australia's housing crisis.

Contact Nic Andrijic, Partnerships Manager Homes for Homes
T: 0436 396 992 E: nandrijic@homesforhomes.org.au
www.homesforhomes.org.au ABN 26 143 151 544

Homes for Homes

Appendix 1

Projected donations from registered properties with Homes for Homes

This table calculates projected donations over a 30-year period if as few as 5% of current Tea Tree Gully City Council residents registered their properties with Homes for Homes. (u) = unit.

Suburb	Total dwellings	5%	Median sell price	Donation 1 (2030)	Donation 2 (2040)	Donation 3 (2050)	30 year total donations
Banksia Park	1,316	65.8	$539,500	$40,060	$49,445	$69,747	$159,252
Dernancourt	1,534	76.7	$561,500	$48,600	$59,986	$84,616	$193,203
Fairview Park	1,428	71.4	$505,000	$40,690	$50,222	$70,843	$161,755
Golden Grove	3,036	151.8	$605,000	$103,638	$127,918	$180,441	$411,998
Golden Grove (u)	262	13.1	$440,000	$6,505	$8,028	$11,325	$25,858
Greenwith	3,100	155.0	$532,500	$93,142	$114,963	$162,166	$370,270
Highbury	2,446	122.3	$613,000	$84,602	$104,422	$147,298	$336,321
Holden Hill	1,325	66.3	$502,750	$37,586	$46,392	$65,440	$149,419
Holden Hill (u)	197	9.9	$325,000	$3,613	$4,459	$6,290	$14,361
Hope Valley	2,407	120.4	$510,000	$69,264	$85,491	$120,594	$275,349
Hope Valley (u)	368	18.4	$315,500	$6,551	$8,086	$11,406	$26,043
Modbury	1,827	91.4	$475,000	$48,966	$60,438	$85,253	$194,657
Modbury (u)	385	19.3	$328,000	$7,125	$8,794	$12,405	$28,325
Modbury Heights	2,256	112.8	$512,500	$65,237	$80,521	$113,583	$259,341
Modbury Heights (u)	129	6.5	$330,000	$2,402	$2,965	$4,182	$9,549
Modbury North	2,202	110.1	$492,500	$61,191	$75,526	$106,537	$243,255
Redwood Park	2,071	103.6	$500,000	$58,427	$72,115	$101,725	$232,267
Ridgehaven	1,455	72.8	$491,000	$40,310	$49,753	$70,182	$160,244
Ridgehaven (u)	256	12.8	$310,000	$4,478	$5,527	$7,796	$17,801
St Agnes	1,207	60.4	$519,000	$35,346	$43,626	$61,539	$140,512
St Agnes (u)	208	10.4	$321,750	$3,776	$4,661	$6,574	$15,011
Surrey Downs	1,277	63.9	$475,000	$34,225	$42,243	$59,589	$136,057
Tea Tree Gully	1,256	62.8	$552,500	$39,155	$48,328	$68,171	$155,654
Vista	404	20.2	$499,500	$11,386	$14,054	$19,824	$45,264
Wynn Vale	2,716	135.8	$524,000	$80,302	$99,114	$139,810	$319,226
Wynn Vale (u)	285	14.3	$333,000	$5,355	$6,609	$9,323	$21,288
TOTAL	212,108	10,605	$499,750	$1,031,932	$1,273,687	$1,796,661	$4,102,279

Notes:

- Number of properties sourced from 2016 Census data.
- Median house prices sourced from CoreLogic National Market Trends.
- Other data sources include https://app.remplan.com.au/teatreegully/community/trends/ and the Tea Tree Gully City Council website.
- The above assumptions are based on October 2022 market values.
- Assumes an average hold period of 10 years.



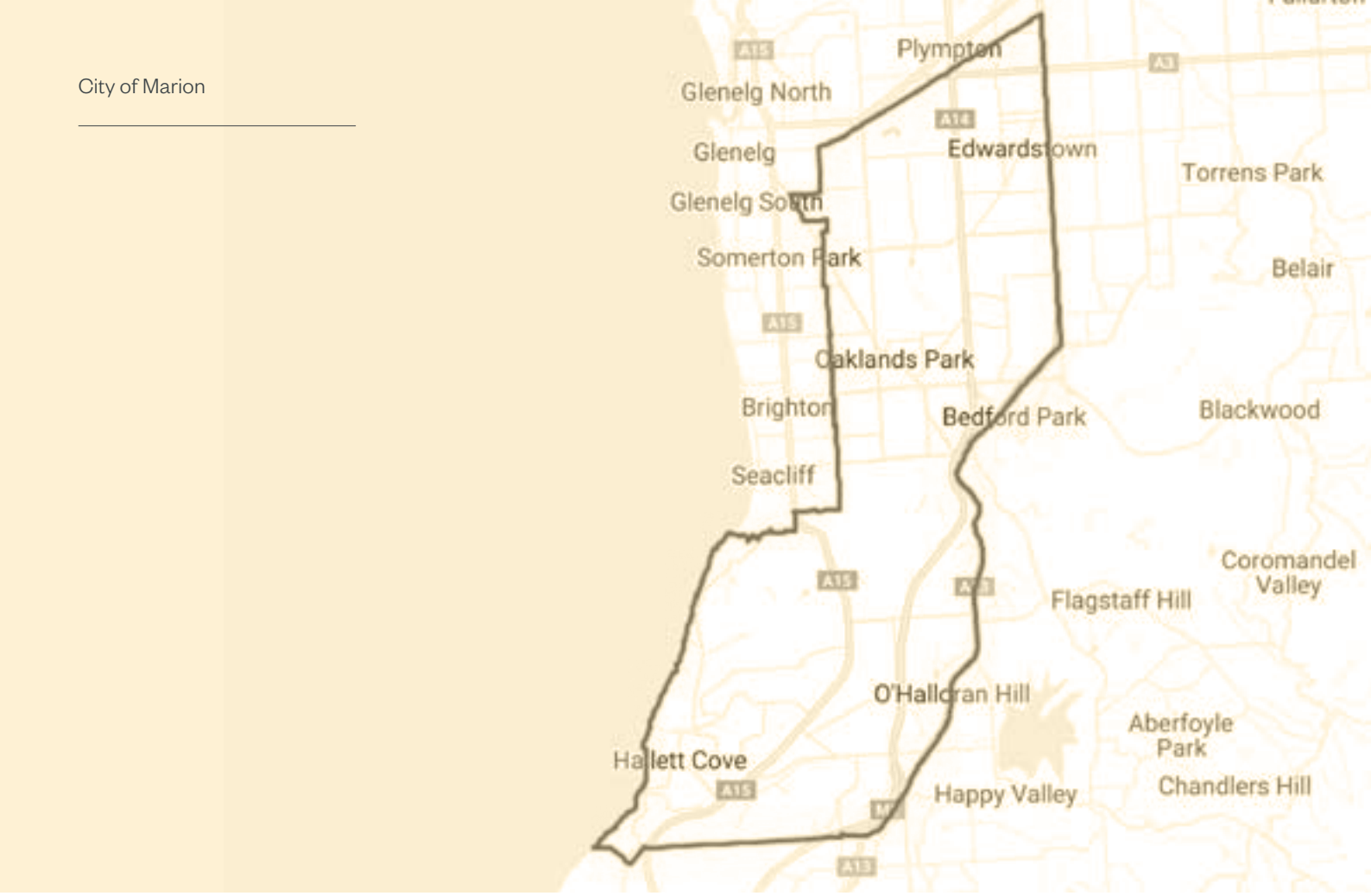
Homes for Homes and City Of Marion

January 2023

Homes for Homes

Created by THE BIG ISSUE

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homesforhomes.org.au ABN 26 143 151 544



Executive summary

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This report has been prepared using data from the 2016 Census, CoreLogic, realestate.com.au and the Department of Land, Water and Planning.

Results of this analysis show the City of Marion can have a significant impact on increasing the supply of social and affordable housing by supporting Homes for Homes.

For instance:

- If Homes for Homes were registered on all new dwellings approved by the City of Marion every year for the next 30 years, using FY21 approval numbers, there is the potential to raise over $2.2m by 2050 through property donations to increase the supply of social and affordable housing; and
- In addition, a further $4.9m could be raised by 2050 if 5% of existing dwellings donated to Homes for Homes when sold within the City of Marion (refer Appendix 1).

The following pages provide a background on the Homes for Homes solution.

Homes for Homes

We believe all people have the right to safe and secure accommodation, yet 116,000 people in Australia are homeless each night and the country has a shortage of more than 600,000 homes (forecast to exceed one million by 2036).

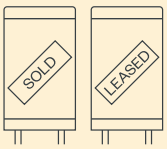
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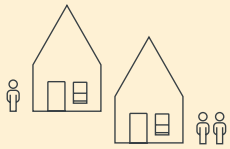
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5. Homes created

Property owners agree to make a voluntary, tax-deductible donation to Homes for Homes when they sell their property. The donation is equivalent to 0.1% of the property's sale price (a donation of 0.1% on a $500,000 property = $500).

- The offer to donate to Homes for Homes is registered on the property's title by way of a caveat. The caveat simply acts as a reminder to donate at settlement time.
- The property remains registered with Homes for Homes indefinitely, encouraging all future property owners to donate when they sell their property.
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Developers and builders' involvement

Partnering with Homes for Homes allows developers and builders to make a significant difference to Australia's social and affordable housing crisis.

Development projects can be pre-registered with Homes for Homes before being sold to homeowners or other property stakeholders. Pre-registration enables future owners to donate to Homes for Homes when they sell their property. Homes for Homes is included in the special conditions of the contract of sale and the developer's marketing material.

Creating housing

Once sufficient funds have been donated, Homes for Homes opens a grant funding round. Housing providers can apply for the funds, their applications are assessed by independent state-based Housing Advisory Groups.

Given the high potential for development projects to take place within the City of Marion, we understand there may be a desire to ensure monies raised within the City of Marion are invested back into the local community, consequently, we are open to establishing a specific City of Marion Housing Advisory Group.

The group would be responsible for identifying and assessing the best options to increase the supply of social and affordable housing in the City of Marion area utilising the funds raised from any landowner/ developer contributions. Following this, ongoing contributions from individual homeowners would revert to the purview of the South Australia state-based Housing Advisory Group.

City of Marion – demographic snapshot

The City of Marion population for 2021 was 95,650, living in 41,650 dwellings with an average household size of 2.35. People living in living in medium or high density 30.4% compared to 26% in Greater Adelaide. The population density is 1,703 per square km. The land size of the City of Marion is 56.17 square kilometres.

Of the people of the City of Marion 20.3% worked in health care & social assistance, 9.6% in education & training & 9.4% in retail in 2021. At the time of the 2021 Census, the median age of people living in City of Marion was 39, the South Australian state average age is 41, with the national average is 38 years. Couples with children represent the majority 27.5% of the population, compared with 28.6% in Greater Adelaide.

The total occupied private dwellings are 41,632, made up 171 of two bedrooms, 1,665 three bedrooms, and 1,338 four or more bedroom dwellings. In 2021 of the dwellings, 36.6% of households have a mortgage, 29.4% own their home outright, 29.1% are renting privately 8.4% were in social housing.

In 2021 the households comprised of, 27% were family households, 28% were single-person households, and 10% were older couples without children households and the 2016 estimated number of homeless persons was 243.

Median weekly household income is $1,625, which is higher than the South Australian median of $1,470 and Australian average of $1,740. Households with income less than $650 is 18.4% and 17.4% of households had a weekly income of more than $30000

Weekly rental median is $330, which is higher than the South Australian media of $300 and lower the Australian median of $380. Households paying $450 or more in 2021 for rent was 15.1%.

The median weekly mortgage repayment in 2021 was $391 higher than the South Australian median of $346 and lower than the Australian media of $432. Households with a mortgage make up 37% of the population.

According to realestate.com.au in May 2022 the median house prices in the City of Marion were as follows:

Suburb	House
Marino	$881,200
Glandore	$880,000
Glengowrie	$790,625
Seaview Downs	$695,000
Seacombe Heights	$675,000
Warradale	$675,000
Marion	$643,750
South Plympton	$637,750
Morphettville	$622,500



This four unit development by Women's Property Initiatives will house older single women who have assets that render them ineligible for social housing and with a limited income that prevents them for accessing a mortgage or owning a home of their own. These women often have to rent in the private rental market where their savings are rapidly depleted. This type of housing safeguards women from the threat of homelessness.

(2018 grant round, Beaconsfield, VIC)

Homes for Homes grant funding

During Homes for Homes grant funding rounds, we welcome any social and affordable housing provider to present us with projects for consideration. There is no pre-determined type of project that we choose to fund. Homes for Homes takes a flexible approach to the projects it supports and is open to considering any organisation, and indeed, any project that creates social and affordable housing.

Homes for Homes has granted over $1.4m toward a diverse portfolio of 17 projects in only a few short years. Funds have been granted across VIC, ACT, NT, NSW, WA and QLD.

Grant funds will help to create housing for a range of people in need, including families living in housing stress, women over 55 escaping family violence, affordable tenancies for people in Aboriginal communities and people with mental illness cared for by aging parents. These projects are in regional and metropolitan locations around Australia including Shepparton, Yea, Box Hill, Darwin, Townsville, Beaconsfield, St Kilda and Canberra. You can read more about all our funded projects at homesforhomes.org.au/funded-projects.

Because homelessness impacts many people in different ways, we look to fund projects that support the diverse range of people experiencing homelessness. In deciding how to disburse funding, our expert Housing Advisory Groups advise on the best projects to fund, based on the greatest housing need and which projects will make the most impact.

When a grant funding round opens in a specific state or territory, funding applicants present us with projects in that jurisdiction. We are open to applicants applying for all or part of the available funds. In previous funding rounds, recipients have applied for as little as $20,000 and as much as $300,000 toward a project. In % terms, Homes for Homes has funded 0.6% of a large (approx. $20 million) project and 40% of a smaller project which demonstrates our flexible approach to grant funding.

Homes for Homes is committed to providing a solution to one of Australia's biggest social issues – the chronic lack of social and affordable housing. With the support of property owners and developers, donations will flow to Homes for Homes to increase housing supply, and ultimately, end homelessness.

Homes for Homes is already having a big impact. We have granted $1.4m to 17 projects creating housing for more than 300 people.



If Homes for Homes were registered on all new dwellings approved by the City of Marion every year for the next 30 years, using FY21 approval numbers, there is the potential to raise over $2.2m by 2050 through property donations to increase the supply of social and affordable housing and, in addition, a further $4.9m could be raised by 2050 if 5% of existing dwellings donated to Homes for Homes when sold within the City of Marion (refer Appendix 1).

Working together

Recently several Melbourne developments included Homes for Homes in their planning permit application, with Homes for Homes working closely with the developers and planners to achieve a positive social outcome. In fact, Homes for Homes was included in the planning permit issued for 111-125 A'Beckett St Melbourne as a public benefit between the City of Melbourne and developer SP Setia under a Section 173 agreement.

Moreland City Council, is the first council to agree to include Homes for Homes in their planning process by providing fast-tracking for developers who include Homes for Homes in their projects through Moreland's design excellence scorecard. We are also in discussions with several other local councils and believe they will follow Moreland's example in due course.

Councils are looking at different ways to support Homes for Homes either through providing uplift or fast-tracking for participating developers and by introducing Homes for Homes to their existing residents. Some councils are considering making Homes for Homes compulsory on all future planning permits. Including Bayside City Council who voted unanimously to do so and are now in the finial steps of actioning.

The registration with Homes for Homes would not compete with any existing City of Marion policies, rather, it would run in parallel.

Homes for Homes would welcome the opportunity to continue discussions with City of Marion to explore how we can work together to solve Australia's housing crisis.

Appendix 1

Projected donations from registered properties with Homes for Homes

This table calculates projected donations over a 30-year period if as few as 5% of current City of Marion residents registered their properties with Homes for Homes.

Suburb	Total Dwellings	5%	Median Price Used	Median House/Unit Price (CoreLogic)	Sale 1	Sale 2	Sale 3	Total
Ascot Park	1,063	53.2	H	$540,000	$32,388	$39,976	$56,390	**$128,755**
Ascot Park	599	30.0	U	$385,000	$13,012	$16,061	$22,655	**$51,728**
Clovelly Park	1,126	56.3	H	$606,000	$38,501	$47,521	$67,033	**$153,055**
Clovelly Park	186	9.3	U	$390,750	$4,101	$5,062	$7,140	**$16,302**
Dover Gardens	1,326	66.3	H	$577,500	$43,207	$53,330	$75,227	**$171,764**
Edwardstown	1,562	78.1	H	$600,000	$52,881	$65,269	$92,068	**$210,218**
Edwardstown	338	16.9	U	$315,000	$6,007	$7,415	$10,459	**$23,882**
Glengowrie	2,029	101.5	H	$790,625	$90,514	$111,719	$157,591	**$359,824**
Glengowrie	392	19.6	U	$422,500	$9,345	$11,534	$16,270	**$37,149**
Hallett Cove	4,534	226.7	H	$606,000	$155,031	$191,350	$269,919	**$616,300**
Hallett Cove	167	8.4	U	$400,000	$3,769	$4,652	$6,562	**$14,984**
Marino	888	44.4	H	$881,200	$44,152	$54,496	$76,872	**$175,519**
Marion	1,371	68.6	H	$643,750	$49,799	$61,465	$86,703	**$197,967**
Mitchell Park	1,764	88.2	H	$547,547	$54,498	$67,266	$94,885	**$216,649**
Mitchell Park	531	26.6	U	$325,000	$9,737	$12,019	$16,953	**$38,709**
Morphettville	1,209	60.5	H	$622,500	$42,465	$52,413	$73,934	**$168,812**
Morphettville	328	16.4	U	$372,000	$6,885	$8,498	$11,987	**$27,369**
Oaklands Park	1,340	67.0	H	$540,000	$40,828	$50,393	$71,085	**$162,307**
Oaklands Park	489	24.5	U	$340,000	$9,381	$11,579	$16,333	**$37,293**
Park Holme	1,172	58.6	H	$585,000	$38,685	$47,748	$67,354	**$153,788**
Park Holme	222	11.1	U	$413,000	$5,173	$6,385	$9,007	**$20,566**
Plympton Park	1,380	69.0	H	$590,000	$45,940	$56,703	$79,985	**$182,629**
Seacombe Gardens	1,414	70.7	H	$527,500	$42,086	$51,945	$73,274	**$167,305**
Seacombe Heights	603	30.2	H	$675,000	$22,966	$28,346	$39,985	**$91,297**
Seaview Downs	1,030	51.5	H	$695,000	$40,391	$49,854	$70,324	**$160,568**
Sheidow Park	2,185	109.3	H	$550,000	$67,807	$83,693	$118,057	**$269,558**
South Plympton	1,665	83.3	H	$637,750	$59,914	$73,950	$104,314	**$238,178**
South Plympton	455	22.8	U	$340,000	$8,729	$10,774	$15,197	**$34,700**
Sturt	1,076	53.8	H	$525,000	$31,874	$39,341	$55,495	**$126,710**
Tonsley	129	6.5	H	$503,000	$3,661	$4,519	$6,374	**$14,554**
Trott Park	1,073	53.7	H	$517,500	$31,331	$38,671	$54,549	**$124,551**
Warradale	2,302	115.1	H	$675,000	$87,674	$108,214	$152,647	**$348,535**
Warradale	414	20.7	U	$441,500	$10,313	$12,729	$17,956	**$40,999**
Glandore	937	46.9	H	$880,000	$46,525	$57,425	$81,003	**$184,952**
Glandore	283	14.2	U	$320,500	$5,118	$6,317	$8,910	**$20,345**
Total	**212,108**	**10,605**		**$543,774**	**$1,249,573**	**$1,542,315**	**$2,175,588**	**$4,967,477**

Number of properties sourced from 2016 Census data.

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- The above assumptions are based on 2022 market values.
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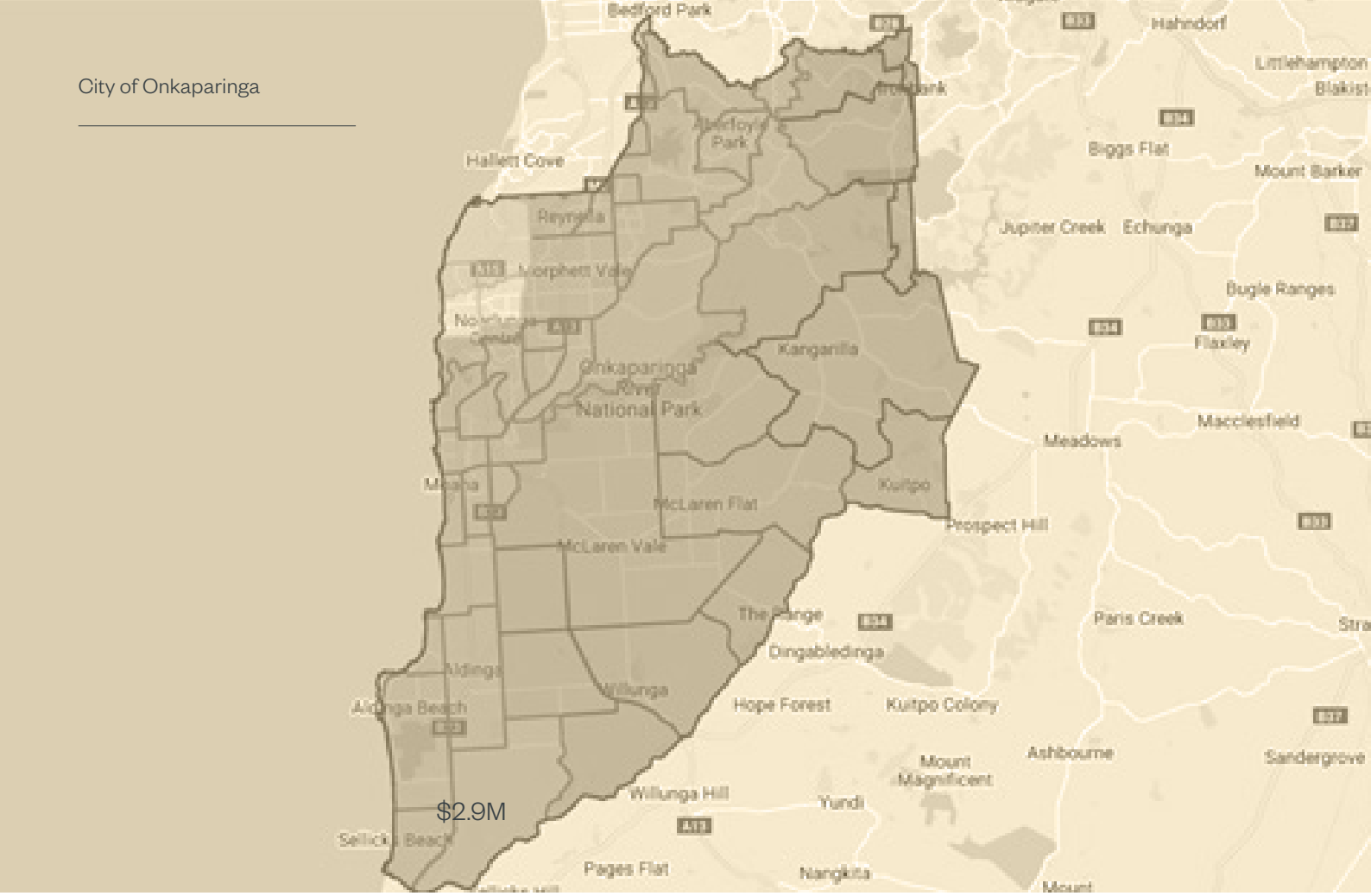
Homes for Homes and City of Onkaparinga

January 2023

Homes for Homes

Created by THE BIG ISSUE

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For instance:

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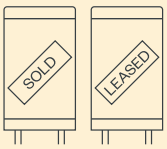
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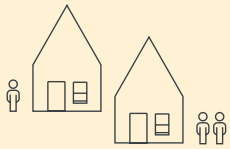
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City of Onkaparinga – demographic snapshot

The City of Onkaparinga usual residential population for 2021 was 175,204, living in 75,494 dwellings. The population has grown by 0.79% higher than the Greater South Australian at 0.51%. The land size of the City of Onkaparinga is approximately 518.2 square kilometres.

Of the people of the City of Onkaparinga 18.2% worked in health care & social assistance, 11% in retail & 10.8% in construction in 2021. At the time of the 2021 Census, the median age of people living in City of Onkaparinga was 41, the same as the South Australian state average, with the national average of 38 years. The average household size is 2.42 and couples with children represent the majority 28.1% of the population.

The total occupied private dwellings are 75,445, made up of 1,446 one bedroom, 7,578 two bedrooms, 38,999 three bedrooms, and 19,846 four or more bedroom dwellings. In 2021 of the dwellings, 41.1% of households are purchasing, 29.6% own their home outright, 17.5% are renting privately 4.4% were in social housing.

In 2021 the households comprised of, 28% were family households, 25% were single-person households, and 13% were older couples without children households and the 2016 estimated number of homeless persons was 485.

Median weekly household income is $1,396, which is slightly lower than the South Australian median of $1,470 and Australian average of $1,740. Households with income less than $650 is 31.4% and 5.5% of households had a weekly income of more than $3000.

Weekly rental median is $312, which is higher than the South Australian media of $300 and lower the Australian median of $380. Households paying $450 or more in 2021 for rent was 5%.

The median weekly mortgage repayment in 2021 was $333, lower than the South Australian median of $346 and Australian media of $432. Households with a mortgage make up 42% of the population.

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Suburb	House
Aberfoyle Park	$530,000
Aldinga	$640,000
Aldinga Beach	$455,000
Cherry Gardens	$952,500
Christie Downs	$360,000
Christies Beach	$428,000
Coromandel Valley	$670,000
Darlington	$577,000
Flagstaff Hill	$640,000

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This table calculates projected donations over a 30-year period if as few as 5% of current City of Onkaparinga residents registered their properties with Homes for Homes.

Suburb	Total Dwellings	5%	Median Price Used	Median House/Unit Price (CoreLogic)	Sale 1	Sale 2	Sale 3	Total
Aberfoyle Park	3,921	196.1	H	$530,000	$117,256	$144,726	$204,151	**$466,134**
Aberfoyle Park	132	6.6	U	$331,500	$2,469	$3,047	$4,299	**$9,815**
Aldinga	207	10.4	H	$640,000	$7,475	$9,226	$13,015	**$29,716**
Aldinga Beach	4,219	211.0	H	$455,000	$108,314	$133,689	$188,582	**$430,585**
Aldinga Beach	229	11.5	U	$367,000	$4,742	$5,853	$8,256	**$18,851**
Cherry Gardens	150	7.5	H	$952,500	$8,062	$9,950	$14,036	**$32,047**
Christie Downs	1,769	88.5	H	$360,000	$35,933	$44,351	$62,562	**$142,846**
Christies Beach	2,331	116.6	H	$428,000	$56,292	$69,480	$98,009	**$223,781**
Christies Beach	557	27.9	U	$367,500	$11,550	$14,256	$20,109	**$45,915**
Coromandel Valley	1,510	75.5	H	$670,000	$57,084	$70,457	$99,387	**$226,929**
Darlington	425	21.3	H	$577,000	$13,837	$17,078	$24,090	**$55,005**
Flagstaff Hill	3,500	175.0	H	$640,000	$126,390	$155,999	$220,053	**$502,442**
Hackham	1,574	78.7	H	$385,000	$34,192	$42,203	$59,531	**$135,926**
Hackham	178	8.9	U	$249,000	$2,501	$3,087	$4,354	**$9,942**
Hackham West	1,319	66.0	H	$355,500	$26,457	$32,656	$46,064	**$105,177**
Happy Valley	3,982	199.1	H	$505,500	$113,576	$140,184	$197,743	**$451,502**
Huntfield Heights	1,540	77.0	H	$397,500	$34,540	$42,632	$60,136	**$137,308**
Maslin Beach	525	26.3	H	$506,000	$14,989	$18,501	$26,097	**$59,586**
Mclaren Flat	472	23.6	H	$663,000	$17,657	$21,794	$30,742	**$70,193**
Mclaren Vale	1,312	65.6	H	$605,000	$44,787	$55,280	$77,977	**$178,044**
Mclaren Vale	222	11.1	U	$376,400	$4,715	$5,819	$8,209	**$18,743**
Moana	1,189	59.5	H	$580,000	$38,911	$48,027	$67,747	**$154,685**
Morphett Vale	8,848	442.4	H	$400,000	$199,696	$246,479	$347,683	**$793,858**
Morphett Vale	1,154	57.7	U	$290,000	$18,883	$23,307	$32,876	**$75,066**
Noarlunga Downs	1,328	66.4	H	$401,000	$30,047	$37,087	$52,314	**$119,448**
O'Halloran Hill	835	41.8	H	$498,000	$23,463	$28,959	$40,850	**$93,272**
Old Noarlunga	573	28.7	H	$433,750	$14,024	$17,309	$24,416	**$55,748**
Old Reynella	1,211	60.6	H	$465,500	$31,807	$39,259	$55,379	**$126,445**
Onkaparinga Hills	794	39.7	H	$600,751	$26,914	$33,219	$46,859	**$106,992**
O'Sullivan Beach	670	33.5	H	$393,000	$14,857	$18,338	$25,867	**$59,062**
Port Noarlunga	1,251	62.6	H	$512,250	$36,158	$44,629	$62,953	**$143,740**
Port Noarlunga	180	9.0	U	$370,000	$3,758	$4,638	$6,543	**$14,939**
Port Noarlunga South	1,234	61.7	H	$520,000	$36,206	$44,688	$63,037	**$143,932**
Port Willunga	947	47.4	H	$527,500	$28,186	$34,789	$49,074	**$112,050**
Reynella	1,877	93.9	H	$464,500	$49,194	$60,719	$85,650	**$195,563**
Reynella	148	7.4	U	$253,500	$2,117	$2,613	$3,686	**$8,415**
Reynella East	727	36.4	H	$451,000	$18,500	$22,834	$32,210	**$73,544**
Seaford	1,629	81.5	H	$502,500	$46,187	$57,008	$80,415	**$183,609**
Seaford Heights	323	16.2	H	$575,000	$10,479	$12,934	$18,245	**$41,659**
Seaford Meadows	1,491	74.6	H	$475,000	$39,961	$49,323	$69,574	**$158,858**
Seaford Meadows	181	9.1	U	$315,000	$3,217	$3,971	$5,601	**$12,789**
Seaford Rise	1,950	97.5	H	$466,750	$51,355	$63,386	$89,412	**$204,153**
Sellicks Beach	1,185	59.3	H	$510,000	$34,100	$42,089	$59,370	**$135,558**
Willunga	849	42.5	H	$641,000	$30,706	$37,900	$53,462	**$122,068**
Woodcroft	3,529	176.5	H	$548,000	$109,118	$134,681	$189,981	**$433,780**
Total	**212,108**	**10,605**		**$441,500**	**$775,659**	**$957,376**	**$1,350,473**	**$3,083,507**

Number of properties sourced from 2016 Census data.

- Median house prices sourced from realestate.com.au.
- The above assumptions are based on 2022 market values.
- Assumes an average hold period of 10 years.

From: [redacted]
To: DTI:PlanSA Submissions
Subject: HIA submission - Greater Adelaide Regional Plan
Date: Monday, 6 November 2023 3:40:23 PM
Attachments: image001.jpg
image002.png
image003.png
image004.png
image005.png
HIA Submission_Greater Adelaide Regional Plan.pdf

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Dear Sir/Madam,

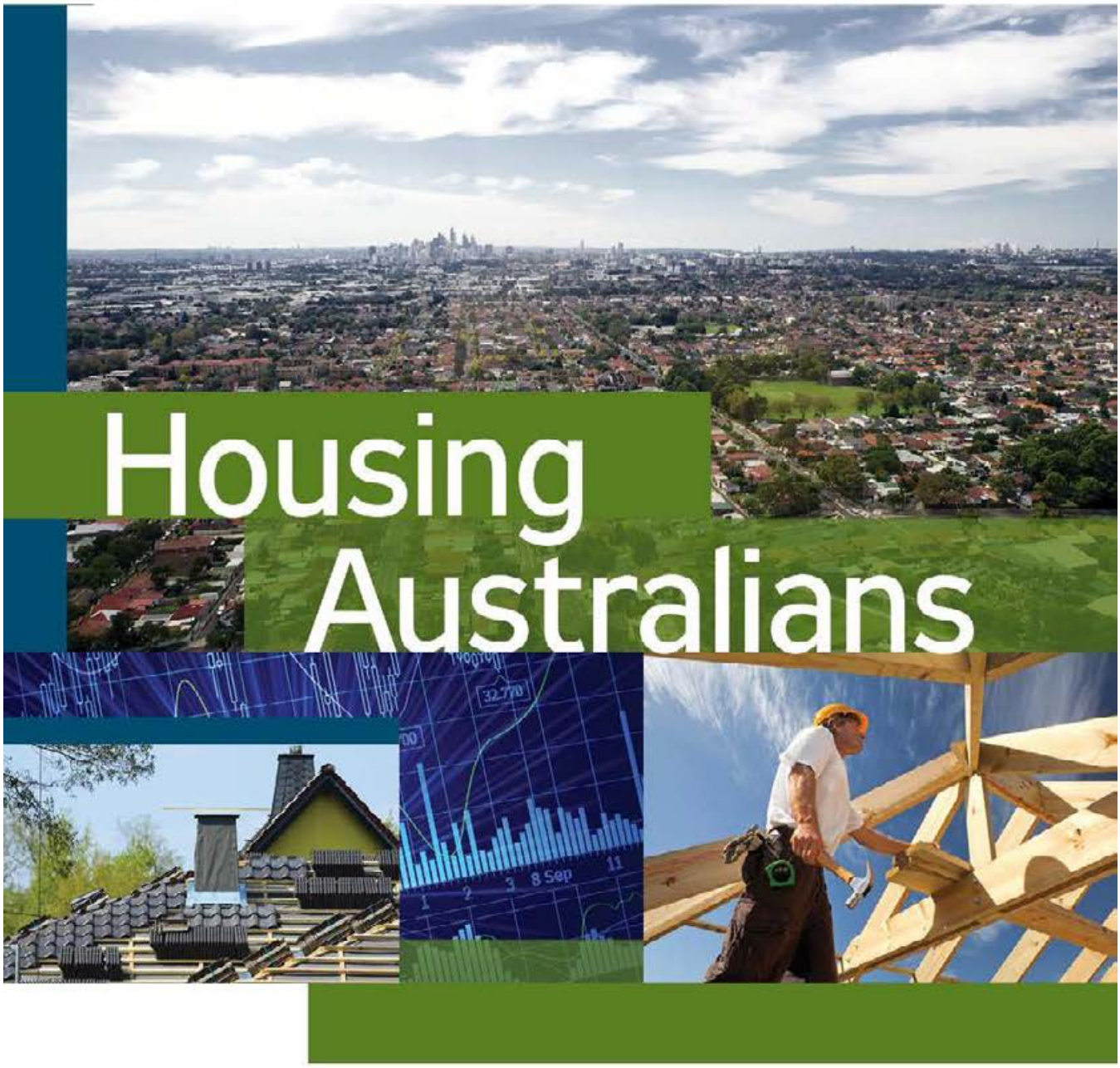
Please find attached HIA's submission for the Greater Adelaide Regional Plan.

If you have any question, do not hesitate to call me.

Regards,

Chris Wiltshire
Assistant Director – Planning, Building and Environment
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HOUSING INDUSTRY ASSOCIATION



Submission to the State Planning Commission

Response to the following discussion paper

GREATER ADELAIDE REGIONAL PLAN

November 2023

HOUSING INDUSTRY ASSOCIATION

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ABOUT THE HOUSING INDUSTRY ASSOCIATION

The Housing Industry Association (HIA) is Australia's only national industry association representing the interests of the residential building industry, including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. HIA members are involved in land development, detached home building, home renovations, low & medium-density housing, high-rise apartment buildings and building product manufacturing.

HIA members comprise a diverse mix of companies including residential volume builders, small to medium builders and renovators, residential developers, trade contractors, building product manufacturers and suppliers and allied building professionals that support the industry.

HIA members construct over 85 per cent of the nation's new building stock.

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into manufacturing, supply, and retail sectors.

Contributing over $100 billion per annum and accounting for 5.8 per cent of Gross Domestic Product, the residential building industry employs over one million people, representing tens of thousands of small businesses and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven residential building development that is affordable as stated in HIA policy – Planning Reform (see appendix).

HIA's mission is to:

> *"promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct."*

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. New policy is generated through a grassroots process that starts with local and regional committees before progressing to the National Policy Congress by which time it has passed through almost 1,000 sets of hands.

Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing industry data and insights for members, the general public and on a contract basis.

The Association operates offices in 22 centres around the nation providing a wide range of advocacy, business support services and products for members, including legal, technical, planning, workplace health and safety and business compliance advice, along with training services, contracts and stationary, industry awards for excellence, and member only discounts on goods and services.

INTRODUCTION

The Greater Adelaide Regional Plan discussion paper (herein referred to as the GARP) outlines planning policies that provide guidance on future development within Adelaide and the immediate surrounding districts. As an overarching legislative instrument, it is critical the content within the final draft reflects consumer behaviours/expectations and considers the factors which contribute to our States economic prosperity.

HIA recognises the extensive work undertaken by the government and appreciates the opportunity to give constructive feedback on the document.

We believe reviewing the existing position is much needed and it is our belief outcomes resulting from this discussion paper have the potential to create better planning outcomes for our members and the public.

It is important the Government ensures authorities who use the GARP to create planning policies can do so by taking a holistic approach when achieving objectives, recognising a balance between economic and social factors.

The system must be robust and developed with sufficient rigor to eliminate unnecessary regulatory barriers for industry and the community. A fully considered system is one that is reasonable for users to comply with and manageable for regulators to apply.

A review must analyse cost/benefit outcomes for any proposed change and accomplish sensible planning provisions in line with consumer affordability. The purpose of a review should be to improve development efficiencies so that changing social patterns and evolving technologies are considered.

Our industry is currently facing many challenges including rising material costs, a constrained labour market, product supply delays and broader “cost of living” issues. It is therefore imperative the building industry is not further hindered by regulatory constraints that cause delays. Time that is wasted has a detrimental impact on the housing sector.

Pressures on building professionals can be reduced by ensuring the PDI Act, the P&D Code and the portal are functioning well in line with the objectives proposed within the GARP.

This submission provides a response to the GARP, our comments listed within are based on a suite of HIA policy statements aimed at assisting statutory planning processes, increasing the timeliness and transparency of decision making.

The purpose of our response is to clarify our position on topics covered in the GARP as well as the planning system in general. We encourage the Government takes a bilateral approach when reaching a resolution, that the administration processes used to enact planning outcomes are reviewed conjunctively with objectives/targets set under the GARP.

Acknowledging the GARP is to succeed the 30-Year Plan for Greater Adelaide, our submission will include an analyse of the current strategy to determine whether provisions within it are adequate for the newly formed position.

1. REVIEW OF THE 30-YEAR PLAN FOR GREATER ADELAIDE

1.1. OBJECTIVE OF THE PLAN

In 2010, the then Government released a 30-Year Plan (herein referred to as the 2010 Plan) allocating targets for long term projected population growth, housing supply and employment opportunities. The overarching objectives of the Plan were to maintain and improve liveability, increase competitiveness and drive sustainability and resilience to climate change.

Policy priorities included.

- steady population growth of 560,000 people
- construction of 258,000 additional homes

Aligned with achieving targets was the improvement of existing transport infrastructure including the electrification of rail systems, extensions of rail to Noarlunga-Seaford, expansion of the western tram line and increasing the O-barn track.

To meet housing numbers, the strategy required new development reach a ratio of 70% infill to 30% greenfield. Medium and high-density development was to be assisted by the creation of 14 new transit-oriented developments (TODS) and the establishment of 20 sites for such projects.

In 2017, the Plan was amended (herein referred to as the 2017 Update) and provided a more conservative approach. Population growth was amended to 545,000 and additional homes were reduced by 10,000 to a target of 248,000. Infill ratios were increased to 85% while projections of economic growth, job creation and TODS were removed. Further to this, the Environment and Food Production Area (herein referred to as the EFPA) was introduced, limiting the number of locations in which development could take place.

1.2. RESULTS

Altering the Plan in 2017 meant less accountability for Government. Not only were aspirational figures for population growth and construction revised to lower numbers, but 89 targets were reduced to 6. With that said, an examination of the 2010 Plan and 2017 Update does provide insight into the current situation.

1.2.1. GREATER ADELAIDE POPULATION GROWTH VERSES GOVERNMENT TARGETS

To get a true indication of the target accuracy (predictions), numbers ought to be compared against percentage growth on an incremental scale, referred to as the growth rate.

As part of this submission, population figures are obtained from the 2011 & 2021 ABS census. Note that boundaries for Greater Adelaide under the 2010 Plan and 2017 Update are inclusive of the Fleurieu Region and Barossa Region. Under census data, both the Fleurieu and Barossa Regions are excluded from Greater Adelaide data.

TABLE 1A: POPULATION PERCENTAGE GROWTH

	Population 2011	Population 2021	Actual % growth rate
Greater Adelaide	1,225,235[1]	1,387,290[2]	1.25 %
Barossa Region	64,839[3] [4]	75,684[5] [6]	1.56 %
Fleurieu Region	41,937[7] [8] [9]	50,703[10] [11] [12]	1.97 %
TOTAL	**1,332,011**	**1,513,677**	**1.29 %**

TABLE 1B: PREDICTED PERCENTAGE GROWTH WITHIN THE PLAN

	Population 2011	30-year projected population growth	Targeted % Growth rate	Targeted Population 2041
The Plan (2010 version)	1,332,011	560,000	1.18 %	1,892,011
The Plan (2017 version)	1,332,011	545,000	1.15 %	1,877,011

TABLE 1C: ACTUAL POPULATION GROWTH VERSES PREDICTED POPULATION GROWTH.

	Actual % growth in 2021	Actual population in 2021	Targeted growth percentage	Targeted population for 2021
The Plan (2010 version)	1.29 %	**1,513,677**	1.18 %	**1,497,802**
The Plan (2017 version)	1.29 %	**1,513,677**	1.15 %	**1,493,367**

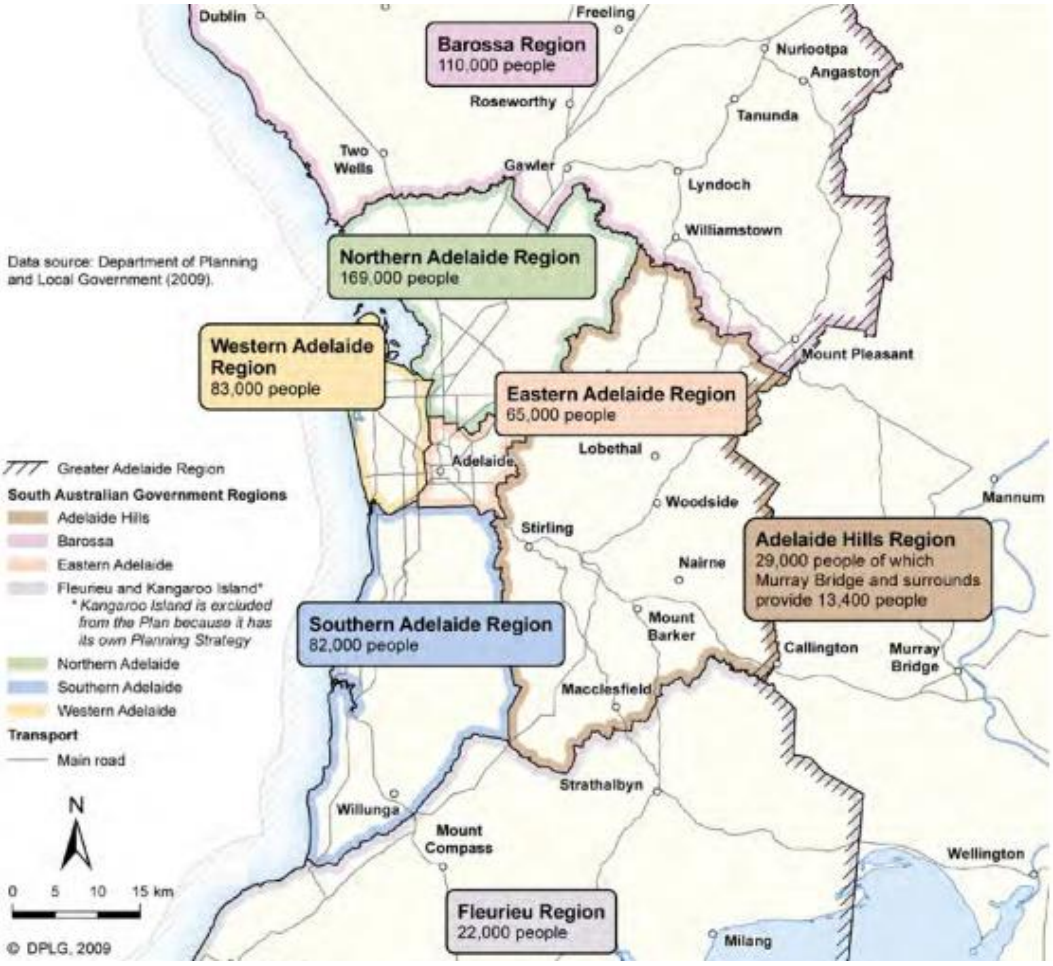
The following observations were made up to 2021.

- **Both the 2010 Plan and 2017 Plan provided target values less than the actual population growth.**

1.2.2. PREDICTED AREAS OF POPULATION GROWTH

Under the 2010 Plan, population growth was designated to areas within Greater Adelaide (refer to Figure 1). Although removed from the 2017 Update, an analysis of the dispersal prediction provides useful intel on growth.

Figure 1



1.2.2.1. BAROSSA REGION

TABLE 2.1(i): PREDICTED PERCENTAGE GROWTH FOR THE BAROSSA REGION

	Population 2011	30-year projected population growth	Predicted % Growth	Predicted Population 2041
The Plan (2010 version)	64,839 [3] [4]	110,000	3.36 %	174,839

TABLE 2.1(ii): ACTUAL POPULATION GROWTH VERSES PREDICTED POPULATION GROWTH BAROSSA REGION

	Actual % growth in 2021	Actual population in 2021	Predicted growth percentage	Predicted population for 2021
The Plan (2010 version)	1.56 %	**75,684** [5] [6]	3.36 %	**90,232**

The following observations are made.

- Under the original Plan (2010), the Barossa Region was viewed as a critical region to facilitate population growth;
- The actual population growth rate (1.56%) is lower than the predicted growth rate (3.36 %) under the original plan (2010) for the Northern Adelaide Region, it is higher than the overall predicted population growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18 %) and the 2017 update (1.15 %). With two satellite cities proposed for the region, it is not unreasonable for initial targets to be re-established under the GARP.

1.2.2.2. NORTHERN ADELAIDE REGION

TABLE 2.2(i): POPULATION PERCENTAGE GROWTH IN THE NORTHERN ADELAIDE REGION

	Population 2011	Population 2021	Actual % growth
Elizabeth	9,878[13]	10,829[14]	0.92 %
Elizabeth East	12,165[15]	14,047[16]	1.45 %
Smithfield – Elizabeth North	12,166[17]	12,446[18]	0.22 %
Craigmore – Blakeview	16,193[19]	19,920[20]	2.09 %
Davoren Park	15, 558[21]	18,313[22]	1.64 %
Munno Para West – Angle Vale	**7,781**[23]	**16,215**[24]	**7.62 %**
Virginia – Waterloo Corner	**3,733**[25]	**5,693**[26]	**4.31 %**
One Tree Hill	2,403[27]	2,473[28]	0.29 %
Salisbury (Council)	129,109[29]	145,806[30]	1.22 %
Tea Tree Gully (Council)	95,467[31]	101,174[32]	0.58 %
Enfield - Blair Athol	21,560[33]	25,578[34]	1.72 %
Windsor Gardens	18,585[35]	22,587[36]	1.96 %
Northgate – lightsview	**3,578**[37]	**9,274**[38] [39]	**9.99 %**
Northfield	3,860[40]	5,043[41]	2.71 %
Oakden	3,665[42]	3,583[43]	-0.22 %
TOTAL	**355,701**	**412,981**	**1.50 %**

TABLE 2.2(ii): PREDICTED PERCENTAGE GROWTH IN THE NORTHERN ADELAIDE REGION

	Population 2011	30-year projected population growth	Predicted % Growth	Predicted Population 2041
The Plan (2010)	355,701	169,000	1.30 %	524,701

TABLE 2.2(iii): ACTUAL GROWTH VERSES PREDICTED POPULATION GROWTH IN NORTHERN ADELAIDE

	Actual % growth 2021	Actual population 2021	Predicted growth percentage	Predicted population 2021
The Plan (2010)	**1.50 %**	412,981	**1.30 %**	404,743

The following observations are made.

- The actual population growth rate (1.5 %) is higher than the predicted growth rate (1.3 %) under the original plan (2010) for the Northern Adelaide Region, it is also higher than the overall predicted population growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18 %) and the 2017 update (1.15 %). The greatest population growth occurred on the urban fringe, showing the importance of greenfield development. The greatest population growth rate occurred within Lightsview, an example of infill housing that is primarily supported through braodhectare development.

1.2.2.3. SOUTHERN ADELAIDE REGION

TABLE 2.3(i): POPULATION PERCENTAGE GROWTH IN THE SOUTHERN ADELAIDE REGION

	Population 2011	Population 2021	Actual % growth
Mitcham (Council)	62,898[44]	67,617[45]	0.72 %
Marion (Council)	82,991[46]	94,721[47]	1.33 %
Holdfast Bay (Council)	34,605[48]	37,543[49]	0.81 %
Onkaparinga (Council)	159,576[50]	175, 204[51]	0.94 %
TOTAL	**340,070**	**375,085**	**0.98 %**

TABLE 2.3(ii): PREDICTED PERCENTAGE GROWTH IN THE SOUTHERN ADELAIDE REGION

	Population 2011	30-year projected population growth	Predicted % Growth	Predicted Population 2041
The Plan (2010)	340,070	82,000	0.72 %	422.070

TABLE 2.3(iii): ACTUAL GROWTH VERSES PREDICTED POPULATION GROWTH IN SOUTHERN ADELAIDE

	Actual % growth 2021	Actual population 2021	Predicted growth percentage	Predicted population 2021
The Plan (2010)	**0.98 %**	375,085	**0.72 %**	365,363

The following observations are made.

- The actual population growth rate (0.98 %) is higher than the predicted growth rate (0.72 %) under the original plan (2010) for the Southern Adelaide Region but is lower than the overall predicted population

growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18 %) and the 2017 update (1.15 %). Lower numbers are an indication of the topographical restraints that confront this region.

1.2.2.4. ADELAIDE HILLS REGION

TABLE 2.4(i): POPULATION PERCENTAGE GROWTH IN THE ADELAIDE HILLS REGION

	Population 2011	Population 2021	Actual % growth
Adelaide Hills (Council)	38,628[52]	40,879[53]	0.57 %
Mount Barker (Council)	29,767[54]	39,217[55]	2.80 %
TOTAL	**68,395**	**80,096**	**1.59 %**

TABLE 2.4(ii): PREDICTED PERCENTAGE GROWTH IN THE ADELAIDE HILLS REGION

	Population 2011	30-year projected population growth	Predicted % growth in 2021	Predicted Population 2041
The Plan (2010)	68,395	29,000	1.19 %	97,395

TABLE 2.4(iii): ACTUAL GROWTH VERSES PREDICTED POPULATION GROWTH IN THE ADELAIDE HILLS

	Actual % growth in 2021	Actual population in 2021	Predicted % growth in 2021	Predicted population 2021
The Plan (2010)	1.59 %	**80,096**	1.19 %	**76,983**

The following observations are made.

- The actual population growth rate (1.59 %) is higher than the predicted growth rate (1.19 %) under the original plan (2010) for the Adelaide Hills Region, it is also higher than the overall predicted population growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18 %) and the 2017 update (1.15 %). Mount Barker accounts for a significant part of the population growth and is an example of a successful township expansion.

1.2.2.5. WESTERN ADELAIDE REGION

TABLE 2.5(i): POPULATION PERCENTAGE GROWTH IN THE WESTERN ADELAIDE REGION

	Population 2011	Population 2021	Actual % growth
Port Adelaide (West)	56,601[56]	60,848[57]	0.73 %
Charles Sturt (Council)	104,981[58]	121,840[59]	1.5 %
West Torrens (Council)	54,962[60]	61,699[61]	1.16 %
TOTAL	**216,544**	**244,387**	**1.22 %**

TABLE 2.5(ii): PREDICTED PERCENTAGE GROWTH IN THE WESTERN ADELAIDE REGION

	Population 2011	30-year projected population growth	Predicted % Growth	Predicted Population 2041
The Plan (2010)	216,544	83,000	1.09 %	299,544

TABLE 2.5(iii): ACTUAL GROWTH VERSES PREDICTED POPULATION GROWTH IN WESTERN ADELAIDE

	Actual % growth in 2021	Actual population in 2021	Predicted % growth in 2021	Predicted population 2021
The Plan (2010)	1.22 %	**244,387**	1.09 %	**241,339**

The following observations are made.

- The actual population growth rate (1.22 %) is higher than the predicted growth rate (1.09 %) under the original plan (2010) for the Western Adelaide Region, it is also slightly higher than the overall predicted population growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18 %) and the 2017 update (1.15 %). Although growth was steady, higher density development is needed.

1.2.2.6. FLEURIEU REGION

TABLE 2.6(i): POPULATION PERCENTAGE GROWTH IN THE FLEURIEU REGION

	Population 2011	Population 2021	Actual % growth
Yankalilla (council)	4,397[62]	5,834[63]	2.86 %
Victor Harbor (council)	13,841[64]	16,139[65]	1.55 %
Alexandrina (council)	23,699[66]	28,730[67]	1.94 %
TOTAL	**41,937**	**50,703**	**1.97 %**

TABLE 2.6(ii): PREDICTED PERCENTAGE GROWTH IN THE FLEURIEU REGION

	Population 2011	30-year projected population growth	Predicted % growth in 2021	Predicted Population 2041
The Plan (201	41,937	22,000	1.41 %	63,937

TABLE 2.6(iii): ACTUAL GROWTH VERSES PREDICTED POPULATION GROWTH IN THE FLEURIEU REGION

	Actual % growth in 2021	Actual population in 2021	Predicted % growth in 2021	Predicted population 2021
The Plan (2010)	1.97 %	**50,703**	1.41 %	**48,239**

The following observations are made.

- The actual population growth rate (1.97 %) is higher than the predicted growth rate (1.41 %) under the original plan (2010) for the Fleurieu Region, it is also higher than the overall predicted population growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18%) and the 2017 Update (1.15 %). With two satellite cities proposed for the region, the growth rate (although strong) will need to rise.

1.2.2.7. EASTER ADELAIDE REGION

TABLE 2.7(i): POPULATION PERCENTAGE GROWTH IN THE EASTERN ADELAIDE REGION

	Population 2011	Population 2021	Actual % growth
Eastern Adelaide	**208,669[68]	**232,281[69]	1.07 %

***population figures determined by subtracting Adelaide Hills Region population census data from the Adelaide and Hills population census data.*

TABLE 2.7(ii): PREDICTED PERCENTAGE GROWTH IN THE EASTERN ADELAIDE REGION

	Population 2011	30-year projected population growth	Predicted % growth in 2021	Predicted Population 2041
The Plan (2010)	208,699	65,000	0.91 %	273,699

TABLE 2.7(iii): ACTUAL GROWTH VERSES PREDICTED POPULATION GROWTH IN EASTERN ADELAIDE

	Actual % growth in 2021	Actual population in 2021	Predicted % growth in 2021	Predicted population 2021
The Plan (2010)	1.07 %	**232,281**	0.91 %	**228,487**

The following observations are made.

- The actual population growth rate (1.07 %) is higher than the predicted growth rate (0.91 %) under the original plan (2010) for the Eastern Adelaide Region, however is lower than the overall predicted population growth rates for Greater Adelaide when compared to both the 2010 Plan (1.18%) and the 2017 Update (1.15 %). Similar to the Western Adelaide Region, higher density development is needed to support population growth.

1.2.3. GREATER ADELAIDE COMPLETED HOMES VERSES GOVERNMENT TARGETS

Meeting the aspirational home construction target is determined by analysing the average home completions per year. Further to this, an observation of the number of commenced homes provides an indication of the imminent amount of work in this sector.

Although no data is available on the number of finished homes within Greater Adelaide inside the designated boundaries set under the 2010 Plan, statistics are available on the overall South Australian completion rates as well as homes under construction.

TABLE 3A: HOUSING COMPLETION RATES FOR SOUTH AUSTRALIA [70] [HIA DATA]

	HOUSES	UNITS	TOTAL	TOTAL
	Completions	Completions	Completions	Under Construction
Mar-11	2,336	576	2,912	8,297
Jun-11	2,316	979	3,295	7,387
Sep-11	1,930	807	2,737	7,395
Dec-11	1,910	625	2,535	6,959
Mar-12	1,836	546	2,382	6,752
Jun-12	1,875	642	2,517	6,182
Sep-12	1,656	599	2,255	5,667
Dec-12	1,558	502	2,060	6,015
Mar-13	1,493	421	1,914	6,145
Jun-13	1,696	458	2,154	6,292
Sep-13	1,731	621	2,352	6,168
Dec-13	1,699	487	2,186	6,945
Mar-14	1,881	364	2,245	7,624
Jun-14	1,654	629	2,283	8,150
Sep-14	2,096	1,014	3,110	7,855
Dec-14	2,139	566	2,705	7,909
Mar-15	2,033	821	2,854	7,503
Jun-15	2,261	741	3,002	7,121
Sep-15	2,103	532	2,635	7,109
Dec-15	1,849	608	2,457	6,915
Mar-16	1,741	735	2,476	7,644
Jun-16	1,698	767	2,465	8,171
Sep-16	1,923	589	2,512	8,080
Dec-16	1,733	723	2,456	8,095
Mar-17	1,912	914	2,826	7,802
Jun-17	1,685	441	2,126	8,835
Sep-17	1,786	739	2,525	9,833
Dec-17	1,965	875	2,840	9,610
Mar-18	1,984	587	2,571	10,745
Jun-18	2,020	778	2,798	10,915
Sep-18	1,784	1,023	2,807	10,835
Dec-18	2,233	1,323	3,556	9,390
Mar-19	2,140	640	2,780	9,121
Jun-19	1,960	913	2,873	8,667
Sep-19	1,522	609	2,131	9,212
Dec-19	1,814	433	2,247	9,537
Mar-20	1,806	824	2,630	9,750
Jun-20	1,759	536	2,295	9,764
Sep-20	2,069	811	2,880	9,529
Dec-20	2,063	579	2,642	9,993
Mar-21	2,162	881	3,043	10,720
Jun-21	1,799	745	2,544	11,818
Sep-21	2,083	471	2,554	12,372
Dec-21	1,864	736	2,600	13,614
Mar-22	1,809	490	2,299	14,426
Jun-22	2,901	635	3,536	14,496
Sep-22	2,736	682	3,418	14,331
Dec-22	2,197	546	2,743	14,039
Mar-23	2,167	458	2,625	14,427
Jun-23	2,129	531	2,660	**14,110**
	97,496	**33,552**	**131,048**	

TABLE 3B: YEARLY AVERAGE OF ACTUAL CONSTRUCTED HOMES IN SOUTH AUSTRALIA

	Actual constructed homes (by 2023)	Average yearly rate of home construction
2011 - 2023	131,048	10,081

***TABLE 3C: HOMES THAT COMMENCED CONSTRUCTION IN REGIONAL AREAS VERSES GREATER ADELAIDE[70] [HIA DATA]**

	Houses		Multi-units	
	Greater Adelaide	Regional SA	Greater Adelaide	Regional SA
Sep-11	1,279	603	730	215
Dec-11	1,268	533	454	22
Mar-12	1,106	462	375	26
Jun-12	1,164	524	345	20
Sep-12	978	479	302	29
Dec-12	1,287	673	676	18
Mar-13	1,031	406	426	22
Jun-13	1,207	468	708	12
Sep-13	1,363	614	400	11
Dec-13	1,464	627	984	4
Mar-14	1,320	532	822	29
Jun-14	1,667	720	533	16
Sep-14	1,482	537	615	17
Dec-14	1,614	646	704	10
Mar-15	1,310	481	368	8
Jun-15	1,243	467	989	23
Sep-15	1,572	512	587	7
Dec-15	1,316	415	737	6
Mar-16	1,371	439	1,160	11
Jun-16	1,627	435	969	40
Sep-16	1,537	443	572	6
Dec-16	1,637	444	649	7
Mar-17	1,298	352	574	13
Jun-17	1,555	391	1,274	12
Sep-17	1,657	440	1,427	39
Dec-17	1,631	381	878	14
Mar-18	1,470	395	1,629	5
Jun-18	1,760	476	795	1
Sep-18	1,598	409	711	22
Dec-18	1,434	353	762	30
Mar-19	1,341	342	568	10
Jun-19	1,486	373	615	5
Sep-19	1,627	367	799	-
Dec-19	1,599	366	922	10
Mar-20	1,629	321	641	26
Jun-20	1,450	324	599	18
Sep-20	1,863	448	518	14
Dec-20	2,112	587	533	9
Mar-21	2,395	648	459	6
Jun-21	2,247	653	895	22
Sep-21	2,144	587	580	22
Dec-21	2,612	781	805	7
Mar-22	1,796	513	641	2
Jun-22	2,195	642	819	37
Sep-22	2,257	682	517	26
Dec-22	1,756	530	360	27
Mar-23	1,592	569	335	9
TOTAL	74,347	23,390	32,066	945

**** Under census data, both the Fleurieu and Barossa Regions are excluded from Greater Adelaide data.***

- The total number of homes commenced within the census boundaries for Greater Adelaide is **106,413.**
- The total number of homes commended within the census boundaries for the SA Regional area is **24,335**

1.2.3.1. CALCULATING COMPLETION RATES IN GREATER ADELAIDE

To determine a close approximation of the average yearly rate of completed homes for Greater Adelaide within the boundary lines set under the 2010 Plan, figures shown in Table 3A must be readjusted and split into city verse regional areas and ensure the Barossa and Fleurieu Regions are calculated correctly.

To determine the split, an analysis of the rural population increase reveals the level of growth inside each region. In this analysis, it is acknowledged population growth provides an indicator to the level of housing construction.

TABLE 3D: POPULATION GROWTH IN REGIONAL SOUTH AUSTRALIA (CENSUS DATA)

	Population 2011	Population 2021	population change
Barossa-yorke-mid north	106,519[71]	114,487[72]	+7,968
SA outback	84,619[73]	82,646[74]	-1,973
SA south-east	177,122[75]	193,709[76]	+16,587
TOTAL	**368,260**	**390,842**	**+22,582**

To confirm actual population growth for Greater Adelaide within the boundaries set under the 2010 Plan, both the Barossa and Fleurieu Regions are added to the Greater Adelaide census data and excluded from the Regional SA census data.

TABLE 3E: POPULATION CHANGE IN REGIONAL SOUTH AUSTRALIA (REVISION OF BAROSSA AND FLEURIEU)

	Total change	Excluded Regions	Regional SA (minus Barossa/Fleurieu)
Barossa-yorke-mid north	+7,968	4,776[3] [4] [5] [6]	+3,192
SA outback	-1,973	N/A	-1,973
SA south-east	+16,587	8,766[7] [8] [9] [10] [11] [12]	+7,821
TOTAL	**+22,582**	**13,542**	**+9,040**

TABLE 3F: POPULTATION CHANGE IN PERCENTAGE TERMS WITHIN REGIONAL SOUTH AUSTRALIA

Regional SA minus Barossa/Fleurieu	Barossa & Fleurieu Regions	Total change
9,040 **(40.03 %)**	13,542 **(59.97 %)**	+22,582 **(100 %)**

Of the growth that occurred within the census data boundary lines for Regional SA, 59.97% was located inside the Barossa and Fleurieu Regions. The percentage breakdown provides us with estimated numbers of development activity (commenced homes) for both Regional SA and Greater Adelaide within the boundary configurations of the 2010 Plan.

TABLE 3G: COMMENCEMENTS FOR REGIONAL SA (OUTSIDE THE 2010 PLAN BOUNDARY LINES)

	Commencements under census data boundary lines	Barossa/Fleurieu data to be discounted (% value)	Barossa/Fleurieu data to be discounted (actual numbers)	commencements outside of the 2010 Plan boundary lines
Regional SA	24,335	**59.97 %**	14,593	9,741

TABLE 3G: COMMENCEMENTS FOR GREATER ADELAIDE (WITHIN 2010 PLAN BOUNDARY LINES)

	Commencements under census data boundary lines	Barossa/Fleurieu data to be included (% value)	Barossa/Fleurieu data to be included (actual numbers)	commencements within the 2010 Plan boundary lines
Greater Adelaide	106,413	**59.97 %**	14,593	121,006

TABLE 3H: COMMENCEMENTS IN PERCENTAGE VALUES

	Commencements	Total change
Greater Adelaide	121,006	92.54 %
Regional SA	9,741	7.45 %

TABLE 3I: ESTIMATED COMPLETED HOMES IN GREATER ADELAIDE

Total constructed homes in SA (2023)	% of total homes completed in Greater Adelaide	Number of completed homes in Greater Adelaide	Average yearly rate of completed homes
131,048	92.54 %	121,271	9,328

TABLE 3B: ESTIMATED CONSTRUCTED HOMES VERSES TARGETED CONSTRUCTION

	30-year target constructed homes	Target number of homes constructed per year	Estimated completed homes (2023)	Average yearly rate - completed homes
The Plan (2010)	258,000	**8,600**	121,271	**9,328**
The Plan (2017)	248,000	**8,267**	121,271	**9,328**

The following observations are made.

- The average number of homes completed per year is higher than the target number for both the 2010 Plan and 2017 Update.
- The number of homes under construction over the past year and a half is significantly higher than past averages in SA.
- The yearly average completion rate of homes in SA is likely to be high for the immediate years.

1.2.4. INFILL DEVELOPMENT VERSES GREENFIELD

Both the 2010 Plan and 2017 Update placed a high importance on infill development and a reduction of greenfield activity.

1.2.4.1. INFILL

"New metropolitan housing will gradually move from the existing 50:50 ratio of infill development to fringe development to a ratio of about 70:30" - 2010 Plan (Page 14).

"The Plan aims to progressively change Adelaide's urban form by containing the outward growth of the metropolitan area" – 2017 Update (page 8).

The 2017 Update was very bullish on infill development, proposing the 70:30 ratio be altered to an 85:15 ratio. Statements were made within this plan suggesting community housing preferences were shifting to terrace houses, units and apartments, and that there was a shortage of infill opportunities next to public transport, jobs and services.

Interestingly, a critical policy position nominated under the 2010 Plan to implement such development was removed under the 2017 Update. Transit-Oriented Development (TOD), defined as high density development centred on major public transport routes, formed an important part of meeting original aspirational infill targets of "25-35 dwellings per hectare".

Any reference to TOD's were abandoned under the 2017 Update, effectively dismissing one of the legislative instrument that could successfully underpin a strategy based on infill.

Of the 14 sites nominated under the 2010 Plan, only Bowden could be deemed successfully. Factors that contributed to the failure of the TOD implementation include

- Lack of adequate existing public transport infrastructure;
- The cost associated with establishing such infrastructure; and
- The lack of community demand for high density living.

1.2.4.2. GREENFIELD

> *"Analysis of emerging trends and evidence suggests that greater numbers of people are choosing to live closer to the city in varied forms of housing. This has meant that there has been less pressure than assumed on the fringe and in townships." – 2017 Update (page 19)*

Contrary to the statements made under the 2017 Update, statistical data shows that demand for greenfield development since the inception of the 30-Year Plan has been solid, and that it has significantly supported population growth on the fringes of Adelaide.

To the north, suburbs such as Munno Para West, Angle Vale and Waterloo Corner have had high population growth rates compared to most suburban areas. Further north, the expansion of Roseworthy and Two Wells have also supported larger populations growth rates, with the later experiencing a 3.89 % increase.[77] [78]

To the South of Adelaide, Seaford Meadows has had a significant rise in population of 11.93 %[79] [80], making it one of the highest growing regions in Greater Adelaide.

1.3. SUMMARY OF THE 30-YEAR PLAN

1) **The 2010 Plan and the 2017 Update provided a targeted population growth lower than the actual population growth rate.**

2) **The propositions under the 2017 Update were significantly flawed.**

Lowering the revised population growth rate and home completion target was a mistake. The lack of housing affordability and the rental crisis can be partly attributed to this error. Furthermore, disregarding satellite cities as a strategic policy was also an error.

> *"Evidence is now emerging that over-reliance on this model of growth will not serve us well into the future." - 2017 Update (page 63)*

Given the high distribution of population growth in townships like Mount Barker, the assumption that community preferences for high density development have been proven to be misleading.

3) **Achieving population growth targets could not have been achieved without large scale greenfield activity on the fringes of Adelaide.**

Significant population increases within Greater Adelaide occurred on the periphery northern suburban areas of Munno Para West and Angle Vale (7.6 %)[81] [82], showing a higher-than-average growth rate. Primarily enabled by greenfield development**.**

4) **Townships such as Two Wells and Roseworthy cannot facilitate the growth necessary to meet target numbers as managed under the EFPA.**

The introduction of the Environment and Food Production Area (EFPA) in the 2017 Update has constrained the available land on which satellite cities can grow. The rate of population growth in the Barossa Region is subsequently lower than the target number identified in the 2010 Plan.

5) **There will be a greater reliance on fringe development hereon in to achieve target numbers.**

Broadhectare infill sites ably assisted population growth targets being met in the north and west of Adelaide, specifically Northgate - Lightsview (9.99 %)[37] [38] [39] and Woodville - St Clair (8.11 %)[83] [84] [85]. With that said, broadhectare infill opportunities are being exhausted.

6) **A significantly higher population growth rate target is necessary for the GARP**.

Except for the Eastern Adelaide Region and Southern Adelaide Region, population growth rates in the remaining regions exceeded the target rates nominated under the 2010 Plan and the 2017 Update.

7) **A higher target number of new homes is needed under the GARP.**

The yearly average number of homes completed is above the target number nominated in the 2010 Plan and the 2017 Update. This outcome can be explained by the actual population growth rate exceeding expectations.

8) **Statements within the 2017 Update suggesting sufficient land is available are proven as inaccurate.**

The GARP discussion paper advises 15 years of land supply is available and that further planning is needed for the following 15 years. Given that the 15-year timeframe for land supply falls short of the original 30-Year Plan deadline, it is evidence that projected figures promoted in both the 2010 Plan and 2017 Update fell short of the required numbers. HIA implores the Government not to take a conservative approach when setting targets under the GARP.

2. REVIEW OF THE GARP

2.1. OBJECTIVE

The GARP was release for public consultation with the intent to replace the 30-Year Plan for Greater Adelaide. Two questions are raised which form the basis of discussion.

1) How should Greater Adelaide grow?
2) Where should Greater Adelaide grow?

The public is asked to make comment on where houses and employment land should be designated, how housing and population is to be serviced, which areas need conserving and what major infrastructure is needed.

Policy projections include the following.

- Adelaide's population may grow by as much as 670,000.
- 300,000 homes will be needed to manage such growth.

A population growth rate of approximately 1.19 % is forecast with an average of 10,000 homes constructed each year. To assist with the formation of strategy, 16 state planning policies provide guidance.

2.2. ENVIRONMENT AND FOOD PRODUCTION AREA

As stated in HIA Policy *Managing Urban Land Supplies* (see Appendix), we are opposed to urban growth boundaries of which the Environment and Food Production Area is equivalent (herein referred to as the EFPA). HIA's opposition to urban growth boundaries is on the basis that it restricts the management of urban land supplies. Nevertheless, the purpose of our submission is to provide constructive feedback that assists the state in making an informed decision.

When looking for evidence justifying our position, one only needs to examine the two documents used by the State as reference tools for the planning reform, *Cost and Benefits of Stormwater Management Options* and *Cost and Benefits of Urban Tree Conapy Options*.

> *"There is evidence minor infill has contributed to a significant increase in peak flows, the frequency and volume of runoff, and exported pollutant load. This is because infill development increases density and can create up to 90 per cent impervious surfaces, which is considered 2.5 times higher than most existing drainage systems were designed for."* - (Costs and Benefits of Stormwater Management Options for Minor Infill Development in Planning and Design Code 2020, p. iii)

> *"There is evidence minor infill has contributed to a significant reduction in green cover in many neighbourhoods. This is because infill development generally increases site coverage and driveway crossovers, and reduces space for gardens and tree planting, creating up to 90 per cent impervious surfaces." - (Costs and Benefits of Urban Tree Canopy Options for Minor Infill Development in the Planning and Design Code 2020, p. iii)*

To ensure pressures exerted onto existing infrastructure do not go over critical mass, a balance between greenfield and Infill is required to facilitate sustainable growth. Infill (by itself) cannot be seen as the primary

response to land release but rather part of an equal equation that includes undeveloped zones and future urban growth areas.

HIA disagrees in having a designated ratio for infill/greenfield development, especially one that is imbalanced to an 85:15 split as outlined in the 2017 Plan. The GARP calls for an increase in the supply and variety of housing, with a view to improve affordability. For this to be achieve (as a whole), **HIA recommends no infill limits are legislated and that consumer demand dictates progress**.

It is recognised that three areas within the outer regions of Greater Adelaide are scheduled for high scale greenfield activity, namely Hackham, Concordia and Sellicks Beach. In each instance, the supply of land falls next to or within the EFPA. This means expansions will be restricted and valuable time lost. The same issue confronts development around proposed satellite cities Victor Harbour, Goolwa and Murray Bridge.

Acknowledging this development restrains, **HIA calls for the EFPA to be removed to better manage population influx.**

2.3. INFRUSTURCTURE

HIA understands the purpose of the GARP is to provide spatial configurations accompanying major transport routes. Most critical to successful implementation of state policy is the identification of main structural roads and arterial networks within proposed satellite cities. To this extend, the government must establish what land is required to provide essential infrastructure.

HIA does support the promotion of satellite cities as stated in the GARP and calls on the government to make investments into existing roads and highways leading to these designated townships. Governments have a responsibility to implement infrastructure programs that sustainably support anticipated growth in a manner that ensures the investment cost is shared equitably across the whole community.

As stated in HIA Policy *Government Infrastructure Investment* (see Appendix), Infrastructure provision should be planned, developed, and implemented in a coordinated manner by all levels of government, state, regional and local in consultation with the residential building and development industry. This includes infrastructure designed within master planned zones.

Although not specifically in the gambit of the GARP**, HIA would like to make it clear that we do not support delivery costs for main infrastructure being transferring onto developers** and call for sensible designs to ensure government is the primary body equipped to facilitate installation.

Up-front charges and levies against a new development erode housing affordability and are the least efficient way infrastructure costs are recovered, this is referred to in HIA policy *Infrastructure Charges and Levies on Residential Development* (see Appendix).

2.4. URBAN GREENING STRATEGY

The GARP provides comment on climate conservation, placing importance on an urban greening strategy. Such strategy is currently enforced through the Planning and Design Code (herein referred to as the P&D Code), it requires new housing development to foster tree regeneration within private property.

Data collected by the Government suggested Adelaide is losing tree coverage, resulting in warmer ground level temperatures and (in turn) higher energy use. What has not been clearly articulated is the affect surrounding tree

coverage has on thermal heat gains for buildings, in particular the reduction of solar radiation required as part of energy efficiency star ratings.

The consequences of urban tree canopy policy have not been thoroughly understood, nor the dramatic affect it has on housing designs and their footings. Several factors not adequately addressed since the adoption of the tree canopy overlay include.

- **Conflict of objectives**. The P&D Code implores housing proposals maximise sunlight into buildings, yet the Urban Tree Overlay produces an outcome that reduces natural light because of shading.
- **Logistical difficulties in achieving compliance**. Authorities are under resourced to enforce planting, let alone maintenance.
- **Tree effect on neighbouring properties**. It is recognised that trees negatively impact housing, undermining footings due to root invasion. The locality of mandatory trees on neighbouring allotments is not considered under the P&D Code, meaning their positioning has the potential to adversely affect surround land and property.
- **Housing affordability in suburban neighbourhoods**. Engineers are now designing all footings to resist "tree affect", regardless of the existing site conditions. Because engineers are unable to determine tree proximity on neighbouring sites, particularly within new subdivisions, engineers maybe required to design footings over and above what is required at significant extra cost.

Acknowledging tree planting activities are difficult to administer, negatively influence affordability and can reduce the lifetime of a building, **HIA believes mandatory tree planting should be administered on government property and not that of the rate payer. Furthermore, the tree canopy off-set scheme ought to be revoked.**

CONCLUSION

HIA believes the review of the state planning system should respond to long term policy principles set by the Government. We welcome practical solutions that address policies aimed at facilitating a liveable city with greater housing choice.

The overarching criteria of a review must consider the community's capacity to embrace and apply the changes. Our industry, already hurting because of material shortages and a lack of tradespeople, is under enormous pressure. A balancing act must be performed by the government when instigating system changes and improvements for the purpose of clarity and building productivity.

An efficient planning system relies on the speed of delivery and quality outcomes; the formation of strategic policies set under the GARP is critical in achieving such goals. If the targets are incorrect, delivery will be stifled adding to the cost-of-living pressures. This is the situation the State currently finds itself in, a position partly created by the conservative policies set under the 2017 Update.

The GARP asked the public two major questions, of which we are happy to provide a response for each.

Q1. HOW SHOULD GREATER ADELAIDE GROW?

Greater Adelaide needs to grow quicker than was anticipated under the 30-Year Plan, this is made evident by the census data on population growth. Not only must the figures proposed within the GARP be adjusted upwards, but also the speed of delivery should be outlined in the strategy.

Nominated locations for growth must be treated as urgent and contain stringent timeframes to ensure authorities in charge of administering major subdivisions are kept accountable. 10-year targets should be set for all proposed greenfield development.

HIA RECOMMENDATION 1.

That the target population growth for Greater Adelaide be increased to at least match the actual growth rate.

This submission has provided evidence showing that the rate of population growth is higher than the targets released under the 2010 Plan and 2017 Update. While rate of growth was anticipated to be 1.18% (2010), census date reveals the actual growth was 1.29%. At this current rate, our population will be approximately 45,000 more than the target set under the 2010 Plan and 60,000 more when compared to the 2017 Update.

The 30-Year Plan was wrong, and we believe the GARP is also wrong. We hope the Government does not make the same mistake by underestimating Adelaide's progress for the next thirty years.

In summary, Greater Adelaide needs to be growing at a rate quicker than anticipated. The suggested target is 670,000 at a growth of approximate 1.19%. Using empirical evidence to support our argument, HIA strongly believes this needs to be higher.

HIA RECOMMENDATION 2.

The aspirational number of homes shall be raised to meet Federal Government targets.

The Federal Government has set a target of 1.2 million homes to be built within the next 5 years. If South Australia receives its share of the stimulus, approximately 83,750 houses are needed at an average of 16,750 per year.

Although yearly averages have historically ranged between 9,000 and 12,000 homes, the target established by the Federal Government is only slightly higher than the current average of housing commencements over the past 18 months. Acknowledging the introduction of HomeBuilder has boosted construction activity, the high number of commencements will likely remain consistent for the remained of this decade.

Q2. WHERE SHOULD GREATER ADELAIDE GROW?

Greater Adelaide should grow both within its suburbs and at the periphery, including peri-urban and townships**.** It is noted the GARP refers to the 85:15 infill/greenfield ratio set under the 2017 Update.

> *"These targets were set to facilitate more development within the urban footprint, using existing infrastructure and connections to jobs and services. But high volumes of infill development in suburban areas have fuelled community concerns about design quality, amenity, tree loss and parking availability."* – the GARP (page 110).

HIA does not endorse a ratio and believes a combination of development types should be employed to meet population growth, inclusive of greenfield, township expansions and infill. Most critical is the timely manner in which infrastructure provisions are catered for.

Any legislative barrier that restricts housing opportunities ought not be considered if the outcome is more a development deterrent rather than a community benefit.

HIA RECOMMENDATION 3.

Remove any reference to an infill/greenfield ratio; That strategic policies set under the GARP have enough flexibility to allow consumer demand dictate population growth.

Based on Government figures released within their document "Land Supply Report for Greater Adelaide" 2023, (herein referred to as the Report) there will be a shortage of land in South Australia for residential development. Therefore, all parts of Greater Adelaide must play a part in the provision of land/property to meet population growth.

The Report identifies an availability of 203,759 lots in total for Greater Adelaide. This is equivalent to 13,584 per annum over 15 years, lower than South Australia's annual share of the Commonwealth Government's initiative for additional housing over the next 5 years.

Under both the 2010 Plan and 2017 Update, infill was seen as a major contributor towards meeting population targets. The disproportionate response (infill/greenfield split) was dependent on two planning strategies, the supply of land through broadhectare infill and the implementation of high-density development concentrated around transport hubs (TOD's).

While broadhectare development within suburban areas provides good outcomes, the lack of such land ultimately makes this proposition unsustainable in the long term and difficult in the short term.

> *"Finding new larger infill sites will take time and coordination between landowners, councils, the community and government." – GARP (page 10)*

In addition to this, failure of the TOD concept places a greater reliance on Greenfield development in lieu of infill.

HIA RECOMMENDATION 4.

Revoke the boundary configurations of the Environment and Food Production Area.

The subdivision of land must be considered on merits with the surrounding amenity as well as economic prosperity. A stringent process exists for rezoning, it should not be contrived by rigid statements. HIA Policy *Principles of a Good Planning System* (see Appendix) alludes to this, planning policies should include both performance objectives and prescriptive standards that provide a degree of flexibility and support changing housing market trends and innovation in housing design and technology.

Most importantly, guidelines for large subdivisions ought to be developed through master planning. Negotiation procedures between public and private sectors must be consistent and timely yet have enough flexibility to account for local conditions in conjunction with other regulatory provisions.

Major subdivision developments take a long time to implement. HIA figures suggest three and a half years from the approval date to home completion is the best-case scenario, although most developments take longer. It is imperative barriers which inhibit the progress of construction are removed.

Post-COVID has shown us how rapidly social and work routines can change, and that planning 30 years in advance is a difficult proposition. The GARP reveals that major growth areas are hindered by the EFPA, so now is the time to revoke it.

HIA RECOMMENDATION 5.

Promote the growth of satellite cities, ably supported by existing and proposed infrastructure.

HIA endorses the concept of satellite cities sustaining population growth as identified in the GARP and advocate the use of existing transport routes to help facilitate their growth,.

Any future proposals for new major transport routes must be primarily supported by Government. Where infrastructure is proposed within master planned development, a shared responsibility is required between all stakeholders, including Government and consumers.

While satellite cities are a great initiative, the time associated with their establishment must be factored into account. The expansion of Roseworthy provides good insight into the time lag, taking six years from approval to shovel ready allotments.

> *"The Roseworthy Township Expansion (RTE) moved from planning to on-ground works during the 2020/21 financial year after a very long lead time" – Light Regional Council* [86]

Knowing a current shortage of land supply exists, and that expansions are a 10-year proposition, the initiation of re-zoning within townships ought to be placed as a high priority. A statement of this effect must be outlined within the GARP.

HIA RECOMMENDATION 6.

Restrict the urban greening strategy to Government and Crown land.

A policy that deals with a "greener" Adelaide can only be truly administered by the authorities who regulate these provisions. HIA believes the GARP should only identify Government owned areas in which tree planting/regeneration activities occur.

The current P&D Code policy dictates individual property owners must support tree planting and ongoing maintenance. This is onerous, especially when droughts are experienced. Furthermore, councils simply do not have enough resources and time to attend to tree audits.

Trees effect soil conditions, detrimentally impacting on building construction. This meaning additional materials are needed to meet compliance i.e. strengthening of footings, having a direct effect on housing affordability. HIA does not support a policy which contributes to cost-of-living pressures.

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Principles of a Good Planning System

Policy Background

- In 2001, HIA launched a national position statement on planning systems, known as Better Living Environments. The position statement focused on three core tenants – flexibility, predictability and affordability. Within these tenants, various case studies and examples of good planning practices that would assist in the delivery of new land and housing were identified.
- Following Better Living Environments HIA has developed a series of policy statements that address individual elements of the planning system, covering issues such as 'truth in zoning', managing urban land supply, development contributions, subsidised affordable housing and more. Today these planning policy statements form the basis of HIA's advocacy for an improved planning system.
- It was agreed there would be benefit in creating a statement that concisely sets out the fundamentals of a good planning system that can serve as a foundation statement on the planning system and the delivery of land and residential developments.

Policy Issues

- In the absence of other regulatory levers, the planning system is now seen as the panacea for any matter that governments believe warrants oversight, making the system extremely complex for all parties to navigate.
- Over the last decade, policy makers have sought to address a growing list of social and environmental issues that have not traditionally been matters for consideration in the planning system.
- A planning system must recognise the importance of delivering housing affordable outcomes. This can only be achieved where the planning system manages the zoning of land and the development of that land in a timely manner balancing the social, economic and environmental benefit of the whole community.

HIA's Policy Position on Principles of a Good Planning System

1. Certainty

a. The planning system must provide certainty to those utilising it.

b. Planning codes and policy must be clearly written to provide certainty to the users and planning authorities of the items that are required to be addressed and the available scope for discretion in decision making.

c. Assessment and determination processes must be reasonable, efficient and relevant to the zoning of the land and other known constraints on the land.

d. The planning system should seek to eliminate repetition and duplication of information requests and assessments.

e. Planning application requirements must not overlap or exceed building application requirements.

f. Planning systems must support truth in zoning by facilitating the development of permitted land uses within each zone.

g. Planning systems should not permit the retrospective application of 'new' requirements or constraints unless compensation is provided to property owners who lose a development right.

h. Fees and charges for planning services should reflect the cost of assessment, be readily calculated and be disclosed prior to lodgement of any application.

i. Planning codes and policies should not incorporate technical building requirements.

2. Consistency

a. Policies developed to guide planning decisions must be written in concise language and be readily and consistently interpreted.

b. The planning system should support consistency of outcomes by providing adequate guidance for design development and decision making.

c. Planning design codes should be applied at the highest level (i.e. state government) to avoid ad-hoc design standards across individual local council areas.

3. Flexibility

a. Planning codes and policy should include both performance objectives and prescriptive standards to provide a degree of flexibility and support changing housing market trends and innovation in housing design and technology.

4. Transparency

a. The planning system should be transparent to the community and the development industry.

b. Planning decisions should be easily understood and have limited potential for real or perceived intervention or influence.

5. Simple, clear processes

a. The planning system should provide processes that do not create undue regulatory burdens for users.

b. Information requirements should be concise, with clear obligations, steps and timelines for the provision of details to the planning authority by an applicant.

c. Planning assessment and determination processes must be reasonable, efficient and relevant to the zoning of the land and type of development proposed.

d. The planning and building systems must provide a single approval pathway for single dwellings and dual occupancy dwellings on land zoned for residential development.

6. Strategically led planning

a. The planning system should embed a strategic approach to spatial planning which balances competing priorities and requires planning authorities to take a holistic approach to achieving planning outcomes, recognising a balance between economic, social and environmental factors.

7. Independent, merit based decisions

b. Planning decisions should be made by informed, independent parties based on the merits of the application, compliance with any relevant statutory requirements and a sound evidence base.

8. Accountability for decisions

a. Planning system should provide clear accountability for the decision making processes and the decisions made on behalf of the community.

b. All planning decisions (zoning, subdivision, development) should be provided with a right of appeal to an independent administrative body.

c. The planning system should not allow multiple planning authorities or agencies to be responsible for overlapping requirements or the duplication of requirements and approval obligations.

9. Outcome oriented decisions

a. Decisions in an effective planning system must be focused on the outcomes, rather than details that have little bearing on the impact of development on the community.

b. The planning system should facilitate:

   i. The development of land in an economically viable manner in accordance with its zoning.

   ii. The timely zoning of land for residential purposes based on a transparent strategic assessment involving all relevant agencies with clear roles and responsibilities for all stakeholders.

   iii. Governments managing land supply, in consultation with the residential development industry, to ensure there is an adequate supply of land at each stage of the land supply pipeline.

   iv. The delivery of public infrastructure that supports residential land zoning and development in a timely manner for the social and environmental benefit of the whole community.

10. Timely decision making

a. Timely decision making means compliance with statutory timeframes where they exist, recognition of the importance of economic investment that results from development approvals and agreement between decision makers and applicants on a program to decision making.

Planning Reform

Policy Background

- Technical standards used for the construction of housing across Australia operate through a national building code. Yet each State and Territory presently operates under planning legislation which is not nationally consistent.
- The impact of state based planning legislation and local housing policies and codes on the housing sector is becoming increasingly evident.
- The cost of delays and the growing gap between the demand for, and the supply of, housing is in many cases directly related to inefficiencies in planning systems.
- State and local governments are seeking to address emerging issues, including some technical construction aspects, through their planning systems, rather than seek changes to the national building code.
- Improvements in the planning system can significantly reduce approval delays and therefore improve the supply and delivery of housing to the market at an affordable price.

Policy Issues

- Planning systems around Australia are characterised by complex and varied zoning controls, definitions and requirements in different council areas.
- The planning process is increasingly becoming complicated and unpredictable with varied requirements for housing, depending on its location.
- Growing planning systems are characterised by their complexity, lengthy approval times and requirements for design compliance at significant cost to industry and the home buying public including:
    - a significant increase in the number of proposals that now require planning approval;
    - greater opportunity being afforded to third parties to influence the decision making process;
    - an increase in the number of referral agencies and an increase in the time taken to process referrals;
    - a myriad of 'additional; issues imposed through local policies and codes coming into play – which at best are subjective and uncosted.
    - government's continued monopoly in undertaking all development assessment work, accompanied by a shortage of skilled planning and associated staff, particularly at the local government level;
    - the rigid application of development standards that generally discourage housing mix and choice and limits the ability of the market to deliver accommodation types that suit demand.
- If the housing industry is to operate successfully in Australia, red tape and bureaucratic differences in the planning system need to be slashed.
- The core of reform should be based around predictability with the ability to clearly demonstrate that a proposal meets performance guidelines, legislated standards or codes.

HIA's Policy Statement on Planning Reform

supports:

1. Consistent planning regulation, with standardised approaches to planning scheme layouts, appropriate levels of assessment for development types and clear frameworks for the introduction of changes which affect building fabric and design.
2. Planning performance being subject to a continual benchmark program that binds all levels of government to ongoing and consistent planning practice improvements – including the potential for them to be tied to national competition policy payments.
3. Mandatory Regulatory Impact Statements for new planning requirements. This includes a comprehensive cost benefit analysis with a particular emphasis on housing affordability by any level of government seeking to introduce new planning regulation recognising that there can be economic, social and environmental benefits from a proposal. The cost benefit analysis must be positive for any new planning requirements to be introduced.
4. Housing affordability as an objective in all state planning legislation, local and regional planning schemes.
5. Streamlining of planning systems which includes the use of:
   - standardised planning requirements;
   - prescribed third party notification and timely processes for referrals;
   - as of right approvals on complying residential approvals;
   - simplified referral processes;
   - the involvement of the private sector in the planning approvals process including necessary engineering approvals required following planning approval;
   - e-Planning processes for lodgement and assessment of planning approvals; and
   - the implementation of independent Development Assessment Panels (DAPs) or regional decision making bodies, where approvals are not determined by delegation.

   Further detail on each of these initiatives is outlined in Attachment A.

HIA does not support:

6. Technical regulation introduced through planning systems in particular, prescribed minimum requirements, which should be applied through the Building Code of Australia (BCA) or which are in conflict with existing standards in the BCA and Australian Standards.

Attachment A: HIA Planning Reform Principles

The following principles should be considered by governments for implementation to streamline planning systems.
There are a number of ways in which planning processes can be streamlined. As a basis for planning reform, lobbying around the following principles is considered desirable:

Model Planning Schemes

Consistency on all planning schemes is desirable and gives a sense of certainty to the industry and reduces red tape for both local government authorities and applicants.

HIA supports:

- The development of standardised or state planning schemes incorporating standard principles (format, zones, definition, etc.) as a way of providing certainty for all councils in their respective planning schemes.

As of Right Development – One Approval – Code Assess

If land is zoned for a certain purpose e.g. residential use, the community should have an expectation that it will be used for this purpose – in accordance with the guiding development principles established either by state or local government.

Where planning approval is required for housing in a residential zone, a simplified approval process should be available.

HIA supports:

- Standardised ‘as-of-right’ development as an appropriate approach for development of a routine nature to ensure only a single approval is required for housing development.
- If an application for development approval is not determined within the legislated decision making timeframe, including any extension of the period, then the application should be deemed to have been approved.

Third Party Objections

In all development proposals third party appeal objections and appeal rights which are available in some states can be a source of lengthy delay in the approval of developments, particularly when many proposals comply with Council planning schemes. Expansion of third party appeal rights which would exacerbate this problem is not supported.

HIA supports:

- If land is appropriately zoned for residential use, third party appeal rights should not apply for complying developments.
- Clarification of notification procedures on a state-wide basis to avoid subjective analysis by Council officers as to who is affected by a residential development.

Referrals

Referral procedures by councils are causing delays and costs in the planning approval process.

A simplified referral process including the potential for a one stop shop process which allows for earlier consultation on issues is desirable with standardised time frames for responses and cooperative dispute resolution.

The housing industry expects certainty in the decision making process and believes that the consent authority should have the responsibility to weigh up conflicting referral responses and independently make a decision in the required statutory time frame.

HIA supports:

- A review of appeal and referral procedures by state and local governments.
- A standardised process for application referrals including time frames and co-operative dispute resolution.
- Consent authorities having responsibility for weighing up conflicting referral responses and independently make a decision.
- A third party being allowed to undertake the referral process independent from authorities.

Private Certification (see HIA Policy *Certification in Planning)*

Private involvement in the planning process, subject to clear pre-set rules and procedures, does not threaten the roles and responsibilities of Local Councils or similar consent authorities.

Private involvement in planning assessments can take a number of forms that can assist council. If undertaken carefully, private certification can free Council staff from non-discretionary duties, allowing more time for merit-based assessments.

HIA supports:

- The introduction of private sector involvement in development assessment processes, both on a formalised and informal basis. Practitioners should be subject to transparency and accountability requirements.
- Mandatory requirements that Councils must offer private certification as an alternative for proponents to progress planning applications in a timely and efficient manner.

e-Planning

Significant opportunity exists for streamlining the planning process through electronic processes. The supply of relevant information via local government websites coupled with the electronic planning application lodgement and issue of approvals is a way of reducing housing costs.

HIA supports:

- The development and application of electronic processes for the lodgement, viewing tracking and issue of planning approvals by local and state governments.

Development Assessment Panels (DAPS)

Independent Development Assessment Panels (DAPS) can assist the planning process by providing a balance between technical planning advice and local knowledge. They can also assist the planning process by providing independent decisions in a timely manner. DAPs can offer certainty and a consistent interpretation of planning codes.

HIA supports:

- The implementation of independent Development Assessment Panels as a means of improving the planning process as they provide certainty, consistency and transparency in the decision making process.
- The setting of clear thresholds as to which applications should be considered by a Development Assessment Panel.

Government Infrastructure Investment

Policy Background

- The timely delivery of infrastructure drives regional growth, employment and housing development opportunities. Productivity enhancing infrastructure is good policy.
- Governments have a responsibility to implement infrastructure programs to sustainably support anticipated growth in a manner that ensures the investment cost is shared equitably across the whole community.
- Since the early 1990s various state governments have pursued a policy to eliminate debt and in doing so have effectively transferred the cost for the delivery of public infrastructure, particularly local, onto new home buyers resulting in an artificial increase in the price of a new dwelling.
- In doing so, many state governments have recorded substantial budget surpluses – significantly funded by relatively high rising property taxes and infrastructure expenditure cutbacks.

Policy Issues

- Governments at all levels have taken a position to reduce borrowing funds for public infrastructure.
- This position has seen a slowdown in the delivery of large infrastructure projects while at the local level there has bene a shift of costs to place the burden of funding community infrastructure directly on new home buyers.
- Local governments are increasingly being challenged to deliver community infrastructure on a limited funding base, against increasing land prices.
- Charges on new home construction to directly fund the delivery of local, regional and state infrastructure have increased in cost and scope over the last decade.

HIA's Policy Position on Government Infrastructure Investment

1. HIA advocates the provision of infrastructure to meet community needs and expectations.
2. Infrastructure provision should be planned, developed, and implemented in a coordinated manner by all levels of government, state, regional and local in consultation with the residential building and development industry.
3. Government infrastructure investment should incorporate strategies that take account of the benefits in delivery and costs that can result from integrating land use and transport planning.
4. Infrastructure provision and funding must have a minimal impact on the affordability of new housing. The funding of infrastructure should be calculated over the full life of the asset and recognise future user pay charges that may apply.
5. As beneficiaries of the provision of new infrastructure the whole community should share the cost of that benefit, by funding the delivery through any of the following mechanisms:
   a. Government direct funding;
   b. Government borrowings;
   c. Tax effective infrastructure bonds (including those raised by public subscription);

d. Public private partnerships that demonstrate clear public interest;
e. General rate levies across the whole community; or
f. User pay charges.

6. Value capture funding mechanisms are not supported as they represent a tax on development which distorts the property market and impacts on housing affordability.
7. Governments should:
   a. Invest in new technology driven infrastructure; and
   b. Lead the way by removing institutional barriers to infrastructure funding and development.

Infrastructure Charges and Levies on Residential Development

Policy Background

- Levies and charges applied to development to cover physical and social infrastructure significantly affect new housing affordability. They are in effect a tax on new homebuyers.
- Most states and territories, through the planning system, can apply a charge on new residential developments via an infrastructure development contribution scheme of some type.
- Over the last decade, the charges being applied through these infrastructure development levy schemes have become increasingly significant. This is partially due the large range and high quality of facilities being requested by authorities and in many cases a conscious decision to shift the majority of the upfront costs onto new developments.
- The levies are now so significant they are impeding orderly and affordable residential development from occurring and significantly adding to the upfront costs of new homes.
- State governments have recognised the negative impact levies have on residential development and introduced ways to slow increases through either standard development levies or capped development levies. However, there is no clear evidence this approach has lowered the charges payable and improved the final cost of a new home.
- Some councils are attempting their own approach to the levies which can result in more levies and varied amounts being charged.

Policy Issues

- Development charges and levies can encompass two types of infrastructure provision:
  1. *Development specific infrastructure* – being items which are directly attributable to new development, defined as those items that are necessary to create the allotment without which the development could not proceed, for example:
     - local roads;
     - drainage;
     - stormwater;
     - utilities provision;
     - land for local open space; and
     - direct costs of connecting to local water, sewerage and power supplies.
  2. *Community, Social and Regional Infrastructure – being items of broader physical, community and social infrastructure which are ancillary to the direct provision of housing in a new development and support residents outside that development, for example:*
     - headworks for water, sewerage and power supplies which may be part of a specific contributions plan;

- community facilities such as schools, libraries, child care facilities, medical centres and retail facilities;
- district and regional improvements such as parks, open space and capital repairs;
- social improvements such as library books;
- public transport capital improvements;
- district and regional road improvements;
- employment services;
- subsidised housing; and
- conservation of natural resources.

- Levies for community, social and regional infrastructure are typically applied by either local and/or state governments through the planning system.
- In many cases the levies are charged without the establishment of a nexus between the infrastructure item and the community who will benefit and use it, without transparency in the collection and without any consideration of the impact on housing affordability.
- Levies of this kind are being viewed as a primary funding source for community, social and regional infrastructure, despite the benefits from that infrastructure being enjoyed by the whole community.
- Whilst development specific infrastructure has a nexus with the allotment or building and directly benefit future home owners community social and regional infrastructure may have limited or no nexus with the population who will occupy the homes in a new development.
- Many items of community, social and regional infrastructure end up in private ownership and are operated on a commercial basis once delivered, such as child care and medical centres. This represents a double charge for new home buyers.
- Every dollar charged in infrastructure contributions adds multiple dollars to the end price of a home as a result of multiple factors including delays in the calculation and setting of the levies, the uncertainty of this process and associated risks, the delays in developments commencing and increased mortgage repayments by the developer and the homebuyer required over time.

HIA's Policy Position on Infrastructure Charges and Levies on Residential Development

1. *Development specific infrastructure* which provides essential access and service provision and without which the development could not proceed are considered to be core requirements for housing development and should be provided in a timely manner to facilitate affordable development. These infrastructure items within the boundaries of the development should be provided by the developer as part of the cost of development.
2. An up-front charge against a new development is the least efficient manner in which infrastructure costs may be recovered.
3. The costs of broader *community, social and regional infrastructure* should be borne by the whole community and funded from general rate revenue, borrowings or alternative funding mechanisms.
4. The imposition of up-front levies on new homebuyers for *community, social and regional infrastructure* is inequitable, discriminatory, inflationary and erodes housing affordability.
5. Where up-front infrastructure levies currently exist for *community, social and regional infrastructure* and until such time as these levies are eradicated in line with dot points 1-4 above:
    - The establishment and calculation should be identified by the authority and be embedded within a statutory planning instrument prepared at the time of approval of land for urban development;

- Governments should be required to prepare a full cost benefit analysis of the impact of any proposed infrastructure levy on housing affordability prior to any implementation;
- The manner in which the up-front levies are costed should be transparent and cover capital and implementation costs only. All ongoing and maintenance costs should be recovered by means of an annual rate or charge and not permitted to be part of the levy calculation;
- Any levies implemented should provide certainty and consistency for future development and home owners about the infrastructure to be delivered, costs to be funded and timing of delivery;
- Levies should be collected at the latest stage of the development process, just prior to the creation of legal title or prior to occupation;
- Once adopted levies should not be subject to any change or variation apart from defined cost of living increases or similar indexation to allow for inflation;
- The amounts collected should be fully disclosed and reported to State Parliament annually and also reported by local councils to their own communities via annual reports.

6. Levies which are applied by Governments for state based items of infrastructure should be:
   - Established and collected in the same manner as those collected by local government as established above; and
   - Expended in the same area from which they were collected.
7. Any funds which have been collected for infrastructure which is not subsequently provided within the planned timeframes should be refunded to the property owner of the development either as soon as the decision is made to eliminate the proposal or at the expiry of the specified time frame.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Sunday, 5 November 2023 6:58 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: The-Greater-Adelaide-Regional-Plan-Discussion-Paper-YourSay-FINAL.pdf; Kent_town_public_realm_manual.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	Ian
Family name:	Pascoe
Organisation:	Kent Town Residents Association (KTRA)
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Kent Town Residents Association (KTRA) represents and acts on behalf of Kent Town residents to maintain and improve quality of life, living conditions and well-being. We care about Kent Town's future: planning, development and environmental issues that impact existing and future residents; and those who visit, work, and enjoy recreation and business enterprise here. We preserve and promote the architectural, social, and cultural fabric that support Kent Town's identity as a popular, historically important precinct. This submission reflects on Kent Town and immediate surrounding suburbs, with ideas towards a flourishing and cohesive modern society in response to the rapid growth across the Greater Adelaide region. The Economist's Global Liveability Index report in 2021 ranked Adelaide as one of the world's most liveable cities. We must preserve this high ranking, to ensure the economic, social, and cultural development of South Australia. Colonel William Light the first Surveyor-General for South Australia would not have envisaged where it is today – a multi-cultural city with a diverse lifestyle, great work-life balance, amidst world-famous wine regions. His vision was ahead of its time - a city surrounded by parklands, divided into north and south, maximising the views of the hills and perspective from the city. It has forged our identity, sense of place and quality of life. With recent developments there are immediate threats to the original vision, on Kent Town and surrounding suburbs. Better protections and management would prevent longer term and further losses. We encourage recognition of First Nations people in the planning: protecting sacred sites, honouring culturally and environmentally significant places and stories; along with the vibrant multi-cultural and diverse society South Australia has become. We hope the GARP will courageously transcend Col Light's vision, nurturing our identity while embracing sustainability and climate responsive desi
Attachment 1:	The-Greater-Adelaide-Regional-Plan-Discussion-Paper-YourSay-FINAL.pdf, type application/pdf, 339.7 KB
Attachment 2:	Kent_town_public_realm_manual.pdf, type application/pdf, 6.3 MB
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Kent Town Residents Association.

People for good communities



6 November 2023

The Greater Adelaide Regional Plan Discussion Paper YourSay
Department for Trade and Investment
GPO Box 1815 Adelaide SA 5001

The Chair of the State Planning Commission

Dear Sir

Submission in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper from the Kent Town Residents Association (KTRA)

Congratulations on the comprehensive and thought-provoking Greater Adelaide Regional Plan Discussion Paper. It is certainly a challenge to find solutions that will fit with current and future residents and stakeholders of Adelaide and surrounds.

Our submission focuses primarily upon Adelaide's eastern suburbs, along with general principals across future developments.

When Colonel William Light, the first Surveyor-General for South Australia planned Adelaide, he would not have envisaged where it is today – a multi-cultural city with a diverse lifestyle, great work-life balance, amidst world-famous wine regions. It is somewhat affordable, home to some of Australia's top education institutions, and has convenient transport.

The Economist's Global Liveability Index report in 2021 ranked Adelaide as one of the most liveable cities in the world.

Whatever happens in the future, we must preserve this lifestyle, and high ranking to further the economic, social, and cultural development of South Australia.

Colonel William Light's vision was controversial; a city surrounded by parklands and divided into north and south. It was truly ahead of its time. We hope the GARP will transcend his vision with similar courage, nurturing our modern identity, belonging and sense of place.

However, his planning maximised the views of the hills and perspective from the city centre, features that are currently at risk with recent developments.

Further, we encourage recognition of First Nations people; protecting sacred sites and honouring culturally significant places and stories; along with the vibrancy of the multi-cultural and diverse society South Australia has become.

There are currently immediate risks and threats to Colonel Light's vision: the sense of place, views, quality of life, and ease of living in this area. Better protections and management would prevent longer term and further losses.

Our specific concerns are noted under Section 2; Section 3 provides our constructive suggestions with some references and case studies. Recommendations are detailed in Section 5. Section 4 addresses the questions from the Discussion Paper.

We refer to two recent Council publications developed for Kent Town, that support the principals and details of this submission.

In particular, the insights into creating a sense of place, maintaining the historical significance; and sustainability, nature-based and environmental considerations. We strongly encourage similar values and principals are reflected across the eastern suburbs and beyond:

- **The Kent Town Public Realm Manual (2021),** a City of Norwood Payneham & St Peters, jointly funded by the State Government Department of Planning Transport and Infrastructure, Places for People Grant Program.
- **The Kent Town Urban Design Framework (2019),** prepared by The City of Norwood Payneham & St Peters, in association with the Department of Planning, Transport & Infrastructure and the Office of Design and Architecture in SA.

We believe these two documents will inform the Commission in their deliberations.

Should it be useful to communicate further with delegates from the Kent Town Residents Association, we would warmly welcome that opportunity.

Please contact the Secretary at email: secretary@ktra.net or the phone number on the submission form.

Meanwhile, we look forward to following the consultation with interest, and wish you the very best with the planning process.

Yours sincerely

Michael Connolly

Michael Connolly

President KTRA

Response to The Greater Adelaide Regional Plan Discussion Paper

From the Kent Town Residents Association

ABN 93 344 846 624 Kent Town SA 5067

Incorporation Number A18816

https://ktra.net.au/

6 November 2023

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1. Introduction

The Kent Town Residents Association (KTRA) consists of residents who care about Kent Town and are concerned for its future.

KTRA represents and acts on behalf of Kent Town residents, to maintain and improve the quality of life, living conditions, community well-being, and amenities. The Association is concerned with planning, development and environmental issues that may impact existing and future residents, as well as those who visit, work, and enjoy recreational activities and business enterprise in Kent Town.

The Association is also interested in preserving and promoting the desirable historic, architectural, social, and cultural features that support Kent Town's identity as a popular historically important precinct.

KTRA is a non-partisan, membership-based organisation; that has incorporated Preserve Kent Town Association (PKTA) which advocated for preserving the historical look and cultural identity of Kent Town for the past 40 years.

This submission reflects upon Kent Town; the immediate surrounding suburbs, and aspects of the plan that will impact directly upon Kent Town.

Additionally, with our overall perspectives, we hope to assist in the creation of a flourishing, vibrant and cohesive society, in response to projected rapid growth across the Greater Adelaide region.

We refer to two recent publications developed for Kent Town, that support the principals and details of this submission. In particular, the insights into creating a sense of place, quality of life, maintaining the historical significance and sustainability, nature-based and environmental considerations.

We would encourage similar values and principals be reflected across the eastern suburbs.

- **The Kent Town Public Realm Manual (2021),** a City of Norwood Payneham & St Peters, jointly funded by the State Government Department of Planning Transport and Infrastructure, Places for People Grant Program.
- **The Kent Town Urban Design Framework (2019),** prepared by The City of Norwood Payneham & St Peters, in association with the Department of Planning, Transport & Infrastructure and the Office of Design and Architecture in SA.

We believe that these two documents will inform the Commission in their deliberations.

2. Reactions when scoping the eastern suburbs of Adelaide

When driving through the suggested current Corridor Zones, Corridor Investigation Zones; and Mass Rapid Transit Investigation Areas in the areas of Magill, Norwood, and Kensington, we noted the following.

2.1 **Character of Kent Town and surrounds**: there were many historical residences, shop fronts, medical practices and shopping strips on Magill Road, Kensington Road, and Norwood Parade. Some of these are heritage listed while others are not. They are all critical to the character of the area and it is important that future generations have access to these properties and businesses and all care must be taken to preserve them.

2.2 **Natural Environment:** we were struck by the number of large trees that have clearly been there for a long time. The historical and environmental significance must be preserved through future-focussed urban design principals, with protections formally in place during construction and land redevelopment processes. **These need to be a controlled and monitored condition of development approvals.**

2.2.1 Some of the **eucalypts would be hundreds of years old**, providing vital shelter and habitat to populations of native animals and birds. For example, the UniSA Magill Campus, and the tree lined side roads in Stepney between Rundle Street and Payneham Road. There are some huge trees, nature strips and recreations areas that should not be removed.

2.2.2 **The trees help reduce the ambient temperature in the suburbs.** Whilst some streets and areas host newer trees, many of them are decades old. There are also introduced species, providing greenspace, shade, and sense of place within private gardens, schools, retirement villages, developments, and nature strips.

2.2.3 **Recommendations for trees, plantings; and interpretive signage.** We refer you to pages 68 to 72 of the attached document – The Kent Town Public Realm Manual (2021), developed by City of Norwood Payneham & St Peters jointly funded by the State Government Department of Planning Transport and Infrastructure, Places for People

2.3 **Current Traffic Congestion:** current congestion in the feeder corridors to Adelaide city impacts this area, and we agree a Mass Rapid Transit System would be advantageous for the eastern suburbs.

2.3.1 History has taught us many lessons and perhaps looking at some of the transport ideas from around 50 - 100 years ago would benefit the committee.
Trams in Kent Town – Kent Town Residents Association (ktra.net.au)
provides a useful reference.

2.3.2 The main issue is that if more people use cars to commute, they converge on Kent Town and surrounds, blocking the flow of traffic. This is already an issue, particularly when roads are closed for the numerous events in the east parklands. This will become more impactful as the current Strategic Infill areas are developed. Additional high-rise apartments near the city have already influenced traffic negatively.

2.3.3 Increasing the number of apartments in the Kent Town/Norwood and surrounds will mean more traffic as people try to go to their jobs which may be out of the area. Kent Town experiences closure of roads on a regular basis and as a result, there are traffic jams.. Adding additional apartments on the major thoroughfares (Magill Rd, Norwood Pde, Kensington Rd) will only increase the traffic chaos that residents of the eastern suburbs endure. Increased traffic will also likely increase accidents as people access the main thoroughfares from their homes but are pressured to take risks because of traffic flow.

2.3.4 Beulah Rd is central to both Magill Rd and Norwood Parade and is surrounded by established houses. It could be ideal street for the construction of a MRT. The road is not a major thoroughfare it will cause minimal disruption during construction and will minimise traffic delays on the major arterial roads.

2.3.5 Service the MRT with underground parking spaces for cars near the stops. The surface of the car park be used for recreation such as tennis courts, playgrounds, skate board parks, bike tracks, etc. There should be adequate security to ensure that users feel safe leaving their vehicles in the car park and while walking to and from the car to the stop.

2.4 **We implore designers and architects to show a little bit more flair in their designs. When comparing skylines with other capital cities in Australia and overseas, Adelaide is not keeping up with urban and city design and architectural uniqueness, particularly with residential high-rises.**

2.4.1 Respectfully, the high-rises recently built in Hurtle Square in Adelaide City; the Strategic Infill area between Rundle Street and Payneham Road; and Norwood Green on Magill Road are following a similar **'boxed-in' like appearance, with some providing restricted internal living and lifestyles.**

2.4.2 **Norwood Green and apartment blocks at 76 Magill Road** have created an overwhelming cement and bitumen presence with a lack of climate responsive and natural surrounds. **Its height entirely blocks out the stunning view** of the hills district, the vital signature feature of the east suburbs and surrounds for other residents and visitors.

2.4.3 **Future developments are at risk of creating an unsightly corridor that destroys the historical attractiveness and liveability features for which the east suburbs and surrounds are known.**

2.4.4 **Safety in recreational and park areas:** the advertising literature for Hurtle Square suggests the adjacent park where people can relax. However, single women, families, and children, would not be as inclined to go there, as at times, homeless people are in the park, perceived as a security risk.

2.4.5 **Traffic and safety issues for children:** Children could not play there unsupervised because of traffic and safety issues, including a lack of fencing and play areas. Ball games would not be possible due to traffic passing nearby. This means the parklands in the city are often not safely accessible for more than 50% of the residents, an issue likely to occur in other high-density and high-rise areas unless increased focus upon lifestyle and liveability is implemented immediately on all new developments.

2.4.6 **East Park Apartments:** the Strategic Infill area between Rundle Street and Payneham Road includes streets with established heritage homes and tree lined streets; yet the recently built East Park Apartments seems to lack quality of living and sense of place.

3. General principles

We hope the Greater Adelaide Regional Plan will transcend Colonel Light's vision with similar courage. The following general principles are some of many that we believe should be considered and ensured:

3.1 **Honour the First Nations history and recognition**, protecting sacred sites and reinstating recognition of culturally significant places and stories. Ensure quality consultation and partnership with traditional owners, organisations and agencies occurs early in this planning process with legislative protections put in place. Explore potential opportunities for cultural tourism and employment.
Additionally, this is an opportunity for existing councils and communities to consider where stories, history and recognition can be recorded, shared, and embraced.

3.2 **Preserve history for future generations** within the suburbs – including buildings, trees, creeks, and roads. Ensure that this history is documented accurately and in detail and is readily available to the community when required. Provide advice to owners of buildings as to the best way to preserve and maintain the historical building. Protecting the vibrancy of the multi-cultural and diverse society it has become.

3.3 **Parks, gardens, and green corridors** – ensure ample nature-filled spaces, with lots of trees, bushes and flowers that are accessible to all the community. Use the principles of climate sensitive design, biodiversity, and equality across all socio-economic segments of our society throughout public places, gathering places, homes, suburban designs, and parks.

3.4 **Greenfield Developments** – an opportunity to plan greenspace, replanting and conserving existing habitats; planned sense of place and living environments that support health and wellbeing.

3.5 **Building Codes** - Preserve and protect ancient and significant trees and habitats with impactful fines and other deterrents to prevent destruction during construction phases.

3.5.1 **Buildings and facilities** – ensure they are aesthetically attractive rather than 'boxes' with windows. Ensure apartments are not too small for families. It is suggested that new apartment complexes include meeting and recreational areas for residents to encourage social interaction.

3.5.2 **Checklist –** A detailed checklist should be developed for developers, council and the public listing all requirements for a development to take place.

3.6 **Our aging and diverse population**. **Equitable access and specific needs** of the aged, disabled, families, and children should be considered.

3.6.1 **Aged care villages -** ensure there are local aged care facilities to allow the aging population to spend their senior years in familiar surroundings.

3.6.2 **Access to shops and services** is important for the older generation. This involves among many other things access for parking of cars which should be simple an unambiguous with room to park, and the ability to manoeuvre and cross the road on foot or in the car.

3.6.3 **Footpaths must be well maintained** so there are no tripping hazards to access facilities. There must be regular crossing areas with safe islands in the middle of the road.

3.6.4 **Local shopping is important** as many do not have the mobility to go far. There needs to be an improvement of what there is currently, to meet expectations and emerging needs.

Elderly or disabled people will not be able to access upper levels if the lifts are down or there is a power failure.

In the case of an emergency, ambulance access is not optimal in these places – especially if there are multiple entrances. In the case of a fire. Many elderly may not be able to use the stairs to escape the fire.

3.7 **Provide social spaces** (e.g., parks, playgrounds, play areas) for children to play, the elderly to walk, as well as meeting facilities for the community to meet and connect.

3.7.1 **Equitable access** - ensure the elderly have unrestricted access to important facilities such as shopping, medical, social, public toilets, libraries, and places of worship.

3.7.2 **School access** – ensure families have access to schools with suitable bus routes, drop off points, and bike lanes.

3.8 **Create a thriving and vibrant sense of place,** through public art, arts centres, and arts and cultural programs.

3.8.1 **Instigate community cultural development and community programs** within existing and new communities, including new immigrant needs; facilitating cohesive relationships with all residents.

3.8.2 **Ensure operational and program funding** is sustainable long-term, and adequate to meet the needs of the diverse communities, providing wrap around support and access for the elderly and intergenerational and cross-cultural relationships.

3.8.3 **Arts and Place Levy** - as an additional means of encouraging developers to contribute tangibly to the liveability, sense of place and climate responsive designs, consider introducing a percent for Arts and Place levy on all new developments and major renovations. This would provide funds to enhance the cultural and vitality of life for South Australia and its residents.
Refer to the case study from the City of Philadelphia in the USA:
www.creativephl.org/public-art/percent-for-art/
The following video is visionary and inspiring. It covers how the arts and culture can build the fabric and life of a city and state.
https://vimeo.com/282602117
Another video provides additional information
https://www.youtube.com/watch?v=u2ef88d5wjI

3.8.4 **Private Sector Partnerships** - instigate relationship development towards private sector partnerships and philanthropy in greenfield areas. Develop strategies to diversify long term funding sources, collaboration, and impact within communities.

3.9 **Local traffic management** is already an issue in side streets in Kent Town where higher-density living is occurring; and flow through of traffic is increasing to the city and other suburbs

3.9.1 **Permit parking** - residents have trouble parking near their homes – in particular, the elderly. Consider implementing permit parking for residents.

3.9.2 **Transit -** ensure cars can transit quicky in and out of this area.

3.9.3 **Pedestrians** can safely use the footpaths and cross the road.

3.10 **Rapid transit -** Provide rapid transit options for residents to allow them to reach their destination quickly and safely.

3.11 **Ring routes** – potential denser traffic demands from satellite towns, with the current inner city road design will heavy congestion (which is already a problem). Create cross-city ring-roads to flow traffic around Adelaide to northern, western, and southern suburbs.

3.12 **Public transport** – ensure it is frequent, accessible, and convenient. Include parking options for rapid transport routes so people can safely, securely, and easily park their cars.

3.13 **Rubbish collection and management** – consider effective and efficient rubbish collection and management. Factor in sound implications upon residential high-rises when early morning collection occurs.

3.14 **Government and Council support** – this should be pro-active and supportive of the community, and for the development of the new satellite communities.

3.15 **Safety and Crime reduction** – consider the impact on safety and crime reduction along train and transport corridors which can create access to more affluent suburbs. Policing, security, and additional cameras should be utilised. Consider the existing crime statistics Crime statistics - Dataset - data.sa.gov.au

4. Discussion paper questions

4.1 **What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the Commission should consider?**

The outcomes from the plan cover the following areas:

- a greener, wilder and climate resilient environment
- a more equitable and socially cohesive place to live
- a strong economy built on a smart future
- better housing choices in the right places.

The outcomes listed above are generic, but while this gives flexibility, it also creates uncertainty for readers. Consideration could be given to specifically mentioning the following in the outcomes:

4.1.1 Honour the First Nations history and recognition, protecting sacred sites and reinstating recognition of culturally significant places and stories.

4.1.2 Facilities for the elderly, children, and the disadvantaged.

4.1.3 Not only major infrastructure, but there are many smaller infrastructure considerations such as (but not exclusively) small business, playgrounds, sporting facilities, medical facilities, safety and security, sustainable infrastructure, social services, rubbish collection, and arts venues as these are essential to developing a community

4.2 **What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these drivers?**

The overarching principle should be that any development should not markedly disadvantage residents already living in the area that is being developed. The current plan assumes that people will travel into central Adelaide where in fact, many employment opportunities are located outside this area. For instance, a person living in Mt Barker could be working at Elizabeth. They should not be required to go into Adelaide and then out again. Consideration should be given to ring routes to allow people to avoid the traffic converging on Adelaide.

The future of Greater Adelaide could be influenced by:

4.2.1 Impact of immigration on population. For example, location of projected migrants close to employment opportunities, will more medical facilities be needed, education impact with the increased population, language training needed and impact on facilities provided by local government and emergency services.

4.2.2 A net increase in people moving from other states/territories. This is influenced by marketing the state to alter existing perceptions to attract industries, tourists, and businesses impacting facilities, accommodation, transport, and education. Refer Population Projections for South Australia and Regions 2021 to 2051 - summary report (PDF, 242 KB)

4.2.3 Job opportunities (E.g., submarine project) – major projects located in SA are influenced by government policies.

4.2.4 The weather (E.g., drought) may cause people to leave the land and cause a redistribution of the population.

4.2.5 The upsurge of entrepreneurs, independent contractors or sole traders who need to work for themselves to make a living. Red tape and government regulations hinder this and if removed will increase opportunities.
Addressing this would require close consultation with Government and Industry leaders - perhaps a state growth-forum could be used to gather alternative views.

4.3 **How can greenfield development achieve an urban form that is consistent with the principles of living Locally?**

4.3.1 Greenfield development will need to go together with development of opportunities for people to earn an income. It is best that people have opportunities to work locally so there is less traffic on the road.

4.3.2 What is essential is that it must be a desirable place to live and have reasonable facilities to support a family (E.g., supermarkets, education facilities, recreation areas, medical facilities, arts facilities, sporting venues, libraries, opportunities to grow, etc.). In other words, forming a community.

4.3.3 Ease of access to public transport.

4.3.4 There will need to be marketing of the concept well in advance so that people are willing to move there.

4.3.5 Government incentives could be provided (E.g., no stamp duty) to attract people to the location.

4.4 **What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbour?**

4.4.1 Satellite cities will grow where there are facilities for a family to exist comfortably, and property can be purchased at a 'value for money' price.

4.4.2 There needs to be access to sporting facilities, green spaces, community, and arts facilities and programs.

4.4.3 Jobs need to be available locally.

4.4.4 Travel when needed needs to be affordable, convenient, and accessible. Mount Gambier is a good example of this sort of development.

4.4.5 Good road design that ensures residents can enter/exit from a few points in case of fire/emergency (I.e., not like Hallett Cove, Aberfoyle Park etc where the roads are all circular, which caused congestion and makes it difficult to exit quickly.

4.5 **What do you see as the benefits and potential drawbacks of greenfield development?**

4.5.1 **Benefits** – can shape the development to be what you want; it sets up a new community; it provides economic benefit for the local area.

4.5.2 **Drawbacks** – it takes time (several years) to set up, it is expensive to set up the infrastructure, there is a significant risk of doing the work and not attracting the people, it takes up agriculture land, there will be longer commutes for people working outside the area, eco-systems may unintentionally be disrupted or changed, local flora and fauna may be destroyed, there is increased financial burden on the taxpayer to fund the development, there may be increased reliance on cars if the public transport is inadequate which may lead to traffic congestion and disruption, as commuters approach Adelaide there will be increased traffic congestion which makes if less desirable for existing residents near the transport route.

4.6 **What are the most important factors for the Commonwealth to consider in meeting future demand for employment land?**

4.6.1 It is not a toxic waste dump or there are issues that may affect the health of the residents who may work there.

4.6.2 Land is available to purchase at a cost that is value for money.

4.6.3 Transport is convenient and readily available and does not have a flow on inconvenience to established residents nearer the city.

4.7 **What are the most important factors for the Commonwealth to consider in meeting future demand for open space?**

4.7.1 What is the impact on food supply?

4.7.2 Are there environmental factors that may impact existing facilities? E.g., land that is developed in an area that supplies a reservoir.

4.7.3 Ensure planning includes a variety of open spaces and green spaces within safe walking distance of residents.

4.8 **What are the most important factors for the Commonwealth to consider in reviewing and achieving the Urban Green Cover Target?**

4.8.1 Targets can be notoriously unreliable. As such, there should be regular reviews of the target to determine if it is still appropriate? Best if this is done with some independent people involved.

4.8.2 Determining how the targets will be measured and communicating that process generally will enable people to assess how the government is performing. On-line review should be available.

4.8.3 Include a variety of Urban Green Cover types in target areas (parks, lawned areas, street verges, playgrounds, community gardens, playing fields).

5. Recommendations

It is recommended that:

Transport + Infrastructure

5.1 A Rapid Mass Transit should use Beulah Rd to access the eastern suburbs. (Ref 2.3.4, 3.10)

5.2 Underground car parking spaces be provided near the MRT stops. Recreational facilities should be placed on top of the parking stations. (Ref 2.3.5)

5.3 Development of high-rise apartments in the eastern suburbs should be minimised to prevent additional traffic jams on arterial roads to the city. (Ref 2.3.2)

5.4 All new developments consider the needs to the elderly when designing car parks, access to the car park and the ability of them to access the facilities. (Ref 2.6.2)

5.5 Footpaths should be well maintained. (Ref 3.6.3)

5.6 More safe islands in the middle of the road should be installed to ensure that people can cross safely. (Ref 3.6.3)

5.7 A diversity of local shops should be included with any new development (Ref 3.6.4)

5.8 Plan ring routes around the city to cater for those working outside of the city. (Ref 3.11)

5.9 For new satellite developments, plan adequate public transport to meet the demands of the population. This needs to be affordable. (Ref 3.12, 4.3.3, 4.4.4)

People, Housing + Liveability

5.10 Architects and designers should show a little more flair in the designs and consider how people live their lives. (Ref 3.7, 3.8.3)

5.11 Quality consultation and partnership with traditional owners, organisations and agencies should take place early in the planning process and legislative protections put in place after this consultation takes place. (Ref 3.1, 4.1.1)

5.12 All new developments provide social spaces for the elderly, children, and the community. (Ref 3.6, 3.7, 4.1.2)

5.13 A 1% levy be placed on all developments to fund the development of arts related areas and programs, leveraging government and community initiatives, and built cultural institutions and art centres. (Ref 3.8.3, 3.8.4)

5.14 History and storytelling, honouring First Nations people, colonisation, and contemporary South Australia – signage, walks, interpretive signage, events, and programs (Ref 3.1)

5.15 Address issues relating to residential parking with permits in near suburbs, ability for pedestrians to cross the road safely, and allowing cars to easily enter and leave the area (Ref 3.9.1).

5.16 For new high-rise developments, consider collection of rubbish issues. (Ref 3.13)

Environment and Natural Resources

5.17 The historical trees at UniSA Magil should must be left standing. (Ref 2.2.1).

5.18 5.18 Large trees should generally not be removed. (Ref 2.2.1)

5.19 Council should continue to plant trees to provide greenspace, shade, and sense of place. (Ref 2.2.2)

5.20 Arts, entertainment and community programs and institutions within the new development areas, providing employment and community cohesiveness (Ref 3.8, 3.8.1)

5.21 A comprehensive checklist for climate responsive construction be developed for developers, council and the public that is transparent and lists all the requirements necessary for a development to take place, including protection of trees, habitats, natural and suburban environments. (Ref 3.3, 3.4)

5.22 Increase penalties for those who disregard building codes and greening codes. (Ref 3.5)

5.23 Strengthen local government monitoring of construction through regulation or training to ensure that the developers comply with their building application. (Ref 3.5)

Employment + Productivity

5.24 Consider the changing nature of employment and the changing opportunities that people have. Recognise that people will change jobs and will need to move between roles. Encourage arts and cultural tourism enterprises in partnership with First Nations initiatives, in complement to existing tourism experiences (Ref 4.2.5, 4.3.1, 4.4.3)

Other

5.25 GARP consider The Kent Town Public Realm Manual (2021) (particularly pages 68-72) and The Kent Town Urban Design Framework (2019) which have been prepared by The City of Norwood Payneham & St Peters when preparing the report. (Ref Introduction)

5.26 For any new satellite city, conduct a marketing campaign and provide incentives for people to move there. (Ref 4.3.2, 4.3.3, 4.4.1, 4.4.2)

6. Links to Resources and Examples

Cover letter

The Kent Town Public Realm Manual (2021), a City of Norwood Payneham & St Peters, jointly funded by the State Government Department of Planning Transport and Infrastructure, Places for People Grant Program.

www.npsp.sa.gov.au/directory_documents/244_kent_town_public_realm_manual
The Kent Town Urban Design Framework (2019), prepared by The City of Norwood Payneham & St Peters, in association with the Department of Planning, Transport & Infrastructure and the Office of Design and Architecture in SA.

www.npsp.sa.gov.au/directory_documents/243_kent_town_urban_design_framework

Reactions when scoping the eastern suburbs of Adelaide: Current Traffic Congestion (page 2)

Transport ideas – trams in Kent Town
Trams in Kent Town – Kent Town Residents Association (ktra.net.au)

General Principals: Create a thriving and vibrant sense of place (page 4 & 5)

Refer to the case study from the City of Philadelphia in the USA:

www.creativephl.org/public-art/percent-for-art/
The following video is visionary and inspiring. It covers how the arts and culture can build the fabric and life of a city and state.
https://vimeo.com/282602117
Another video provides additional information
https://www.youtube.com/watch?v=u2ef88d5wjI

General Principals: Safety and Crime reduction (page 5)

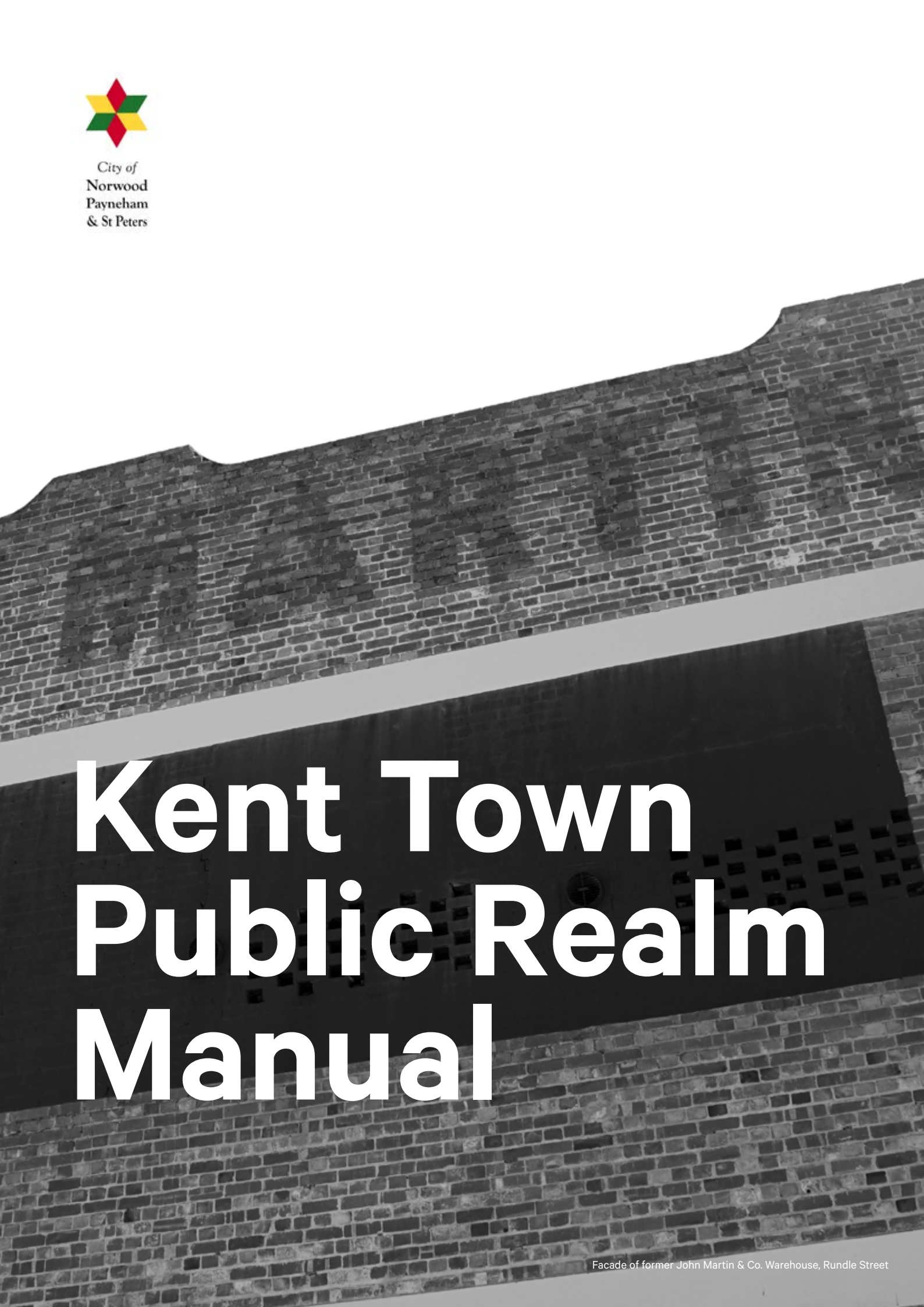
Consider the existing crime statistics Crime statistics - Dataset - data.sa.gov.au

Discussion Paper Questions – Major trends and land use plan drivers (page 6)

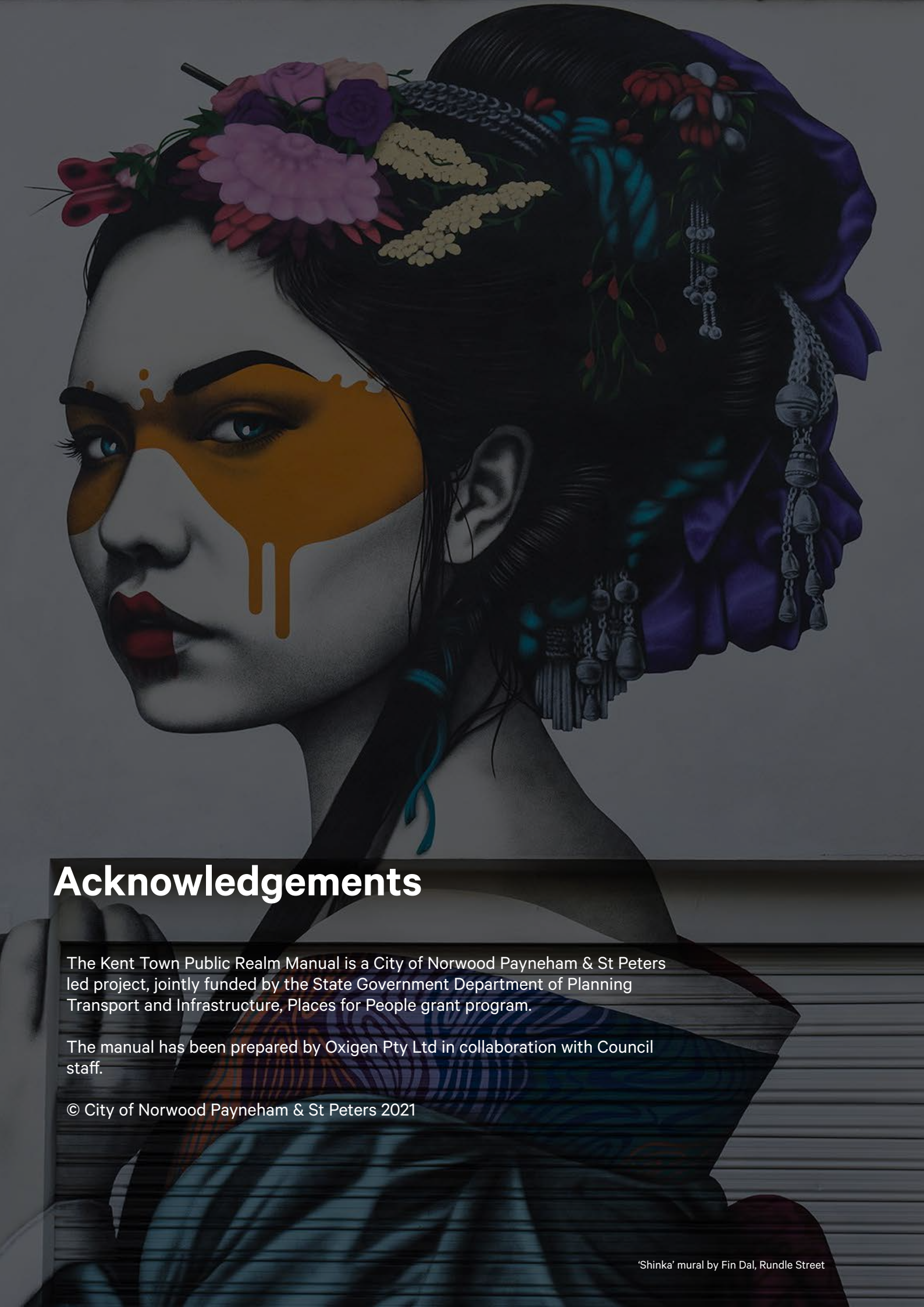
Refer Population Projections for South Australia and Regions 2021 to 2051 - summary report (PDF, 242 KB)

City of
Norwood
Payneham
& St Peters

Kent Town Public Realm Manual



Facade of former John Martin & Co. Warehouse, Rundle Street



Acknowledgements

The Kent Town Public Realm Manual is a City of Norwood Payneham & St Peters led project, jointly funded by the State Government Department of Planning Transport and Infrastructure, Places for People grant program.

The manual has been prepared by Oxigen Pty Ltd in collaboration with Council staff.

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'Shinka' mural by Fin Dal, Rundle Street

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03 - Street Types	20
04 - Public Realm Elements	34



01

Introduction



St Peters Street
St Peters, SA

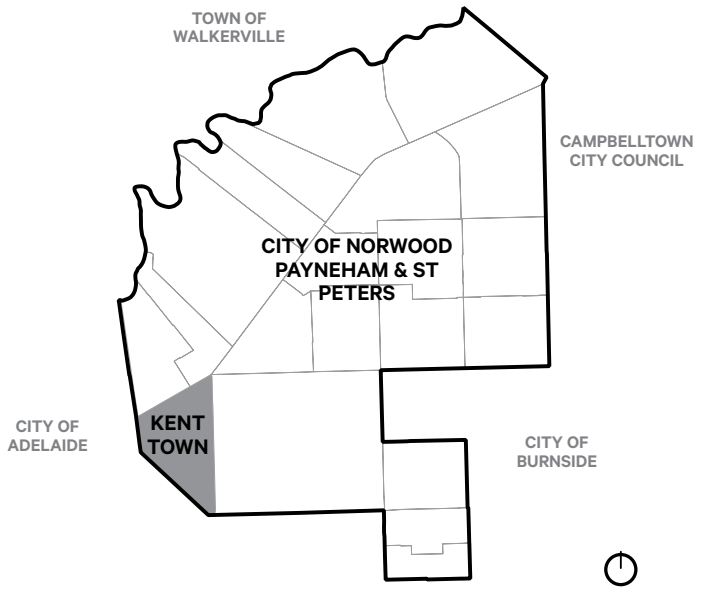
Introduction

OVERVIEW

Kent Town is a unique neighbourhood suburb within the City of Norwood Payneham & St Peters. Its character is defined by a skewed urban layout, diverse built form and mixed land uses.

Strategically located on the fringe of the Adelaide Park Lands and East End Precinct, Kent Town is experiencing significant change as a result of rezoning in 2013 to unlock the potential for higher density and mixed use development.

As the evolution of Kent Town continues, this Public Realm Manual will be used to promote and guide the development of an integrated and high quality public realm and built form that contributes to the unique qualities of the neighbourhood.



HOW TO USE THE MANUAL

The Kent Town Public Realm Manual consists of three sections that follow this introduction. The sections address the Character of Kent Town, Street Types, and Public Realm Elements.

The Character of Kent Town provides a brief overview of the suburb's history, population, urban structure, existing planning and asset information.

Street Types breaks down Kent Town's streets into a hierarchy based on movement and how they are used. Understanding the role, desired character, and typical street layout will inform good design of the public realm.

Public Realm Elements outlines the guiding principles and specifies the palette of standard materials to be used in the design and construction of new public realm capital works projects or development related upgrades. The elements include paving and surfaces, furniture, planting, wayfinding and signage, and public art.

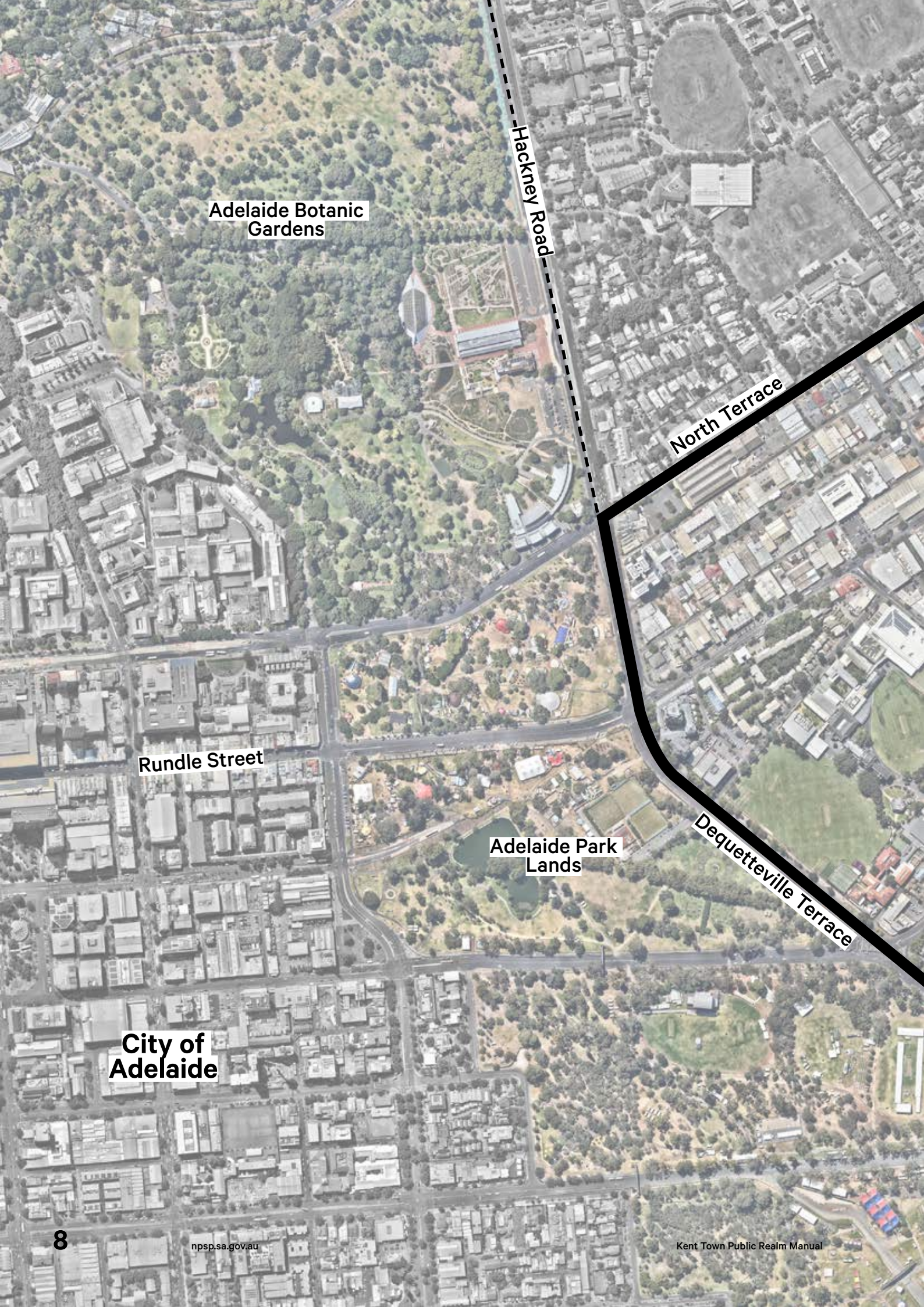
Objectives

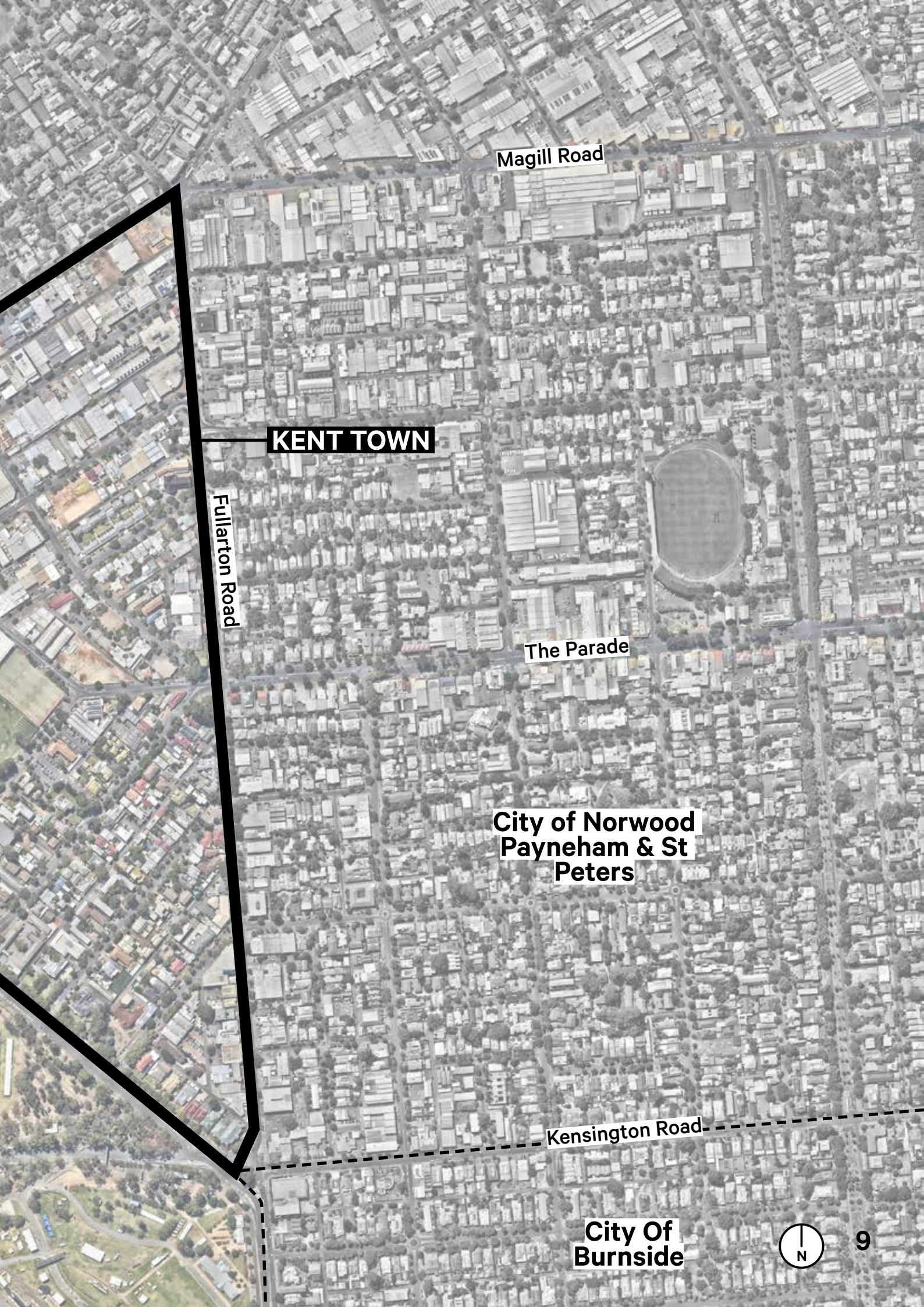
Key Objectives of the Public Realm Manual are to:

1. Provide guidance for the planning, design and implementation of public realm works in Kent Town.
2. Achieve an attractive, vibrant and integrated public realm within Kent Town.
3. Establish a materials palette that reinforces the qualities and character of Kent Town.
4. Specify durable furniture and materials that will reduce long-term maintenance and simplify purchasing.
5. Provide guidance for the management and maintenance of public realm assets.



Mural by Jimmy C, Rundle Street


Adelaide Botanic Gardens
Hackney Road
North Terrace
Rundle Street
Adelaide Park Lands
Dequetteville Terrace
City of Adelaide


Magill Road
KENT TOWN
Fullarton Road
The Parade
City of Norwood Payneham & St Peters
Kensington Road
City Of Burnside
N

Related Documents

The Kent Town Public Realm Manual is not a stand-alone document. Rather it complements the Kent Town Urban Design Framework and Kent Town Design-Hub Review. It is intended to be used with other strategic and statutory documents that guide planning, design and development within Kent Town, including the Council's Development Plan and the Council's Strategic Management Plan, *CityPlan 2030: Shaping our Future*.



Application

Consistent application of the Kent Town Public Realm Manual by Council, developers, consultants, businesses and residents will support the ongoing transformation of Kent Town's streets and laneways into high quality and liveable places.

The Kent Town Public Realm Manual is to be applied to public streets within Kent Town. It is intended to be used by Council staff, design professionals, Government Agencies, consultants and developers. Developers who propose to undertake works in or adjacent to the public realm should use this manual as a reference guide for understanding design and construction considerations of public space.

Examples where the Kent Town Public Realm Manual is applicable include:

— Roadway and footpath renewals.
— Street work and reinstatement adjacent to new developments.
— Assessment of development applications and proposed review of outdoor dining applications.
— Roadway design.
— Other construction projects.

After becoming familiar with and understanding the content within this manual, the reader is ready to identify and select the relevant street type and standard materials palette to be used. Refer to the Public Realm Elements section for specific application information.

Designs should consider a street's context (eg. role, use) and good precedents to ensure a consistent and appropriate application of the Kent Town Public Realm Manual that is complimentary to the street's environment and desired character.

All designs and development projects impacting Kent Town's streetscapes remain subject to approval by the City of Norwood Payneham & St Peters, with people's safety and comfort and creating a high quality public realm as primary objectives.



02

Character of Kent Town



Kent Town from the Brewery, 1881
Courtesy of State Library of South Australia

Kent Town History

The Kaurna are the original inhabitants of the Adelaide Plains. Kaurna Country traditionally includes the land and waters that extend north and south of Adelaide and the wooded foothills of the Mount Lofty Ranges. The heart of Kaurna Country, Tarntanya (red kangaroo place), is now occupied by the City of Adelaide and surrounding Park Lands.

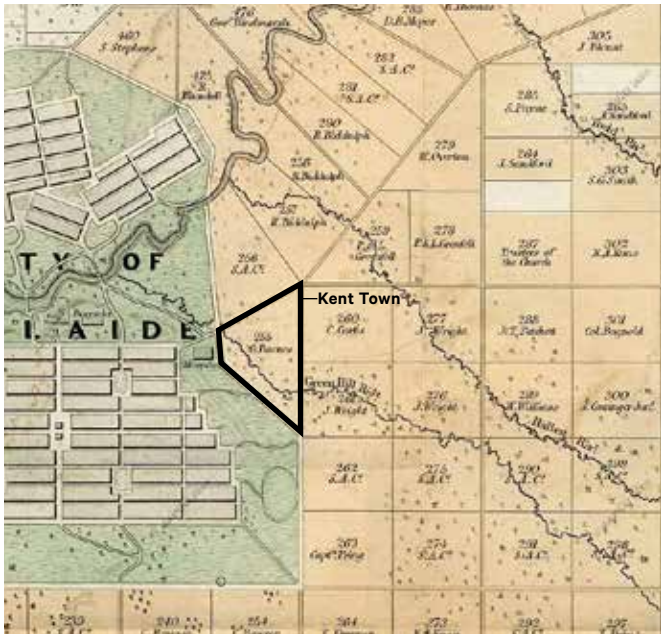
Kent Town was named after Dr Benjamin Archer Kent. He arrived in South Australia in April 1840 and erected a timber cottage in a grove of wattles on the corner of Rundle Street and Dequetteville Terrace. For a number of years Dr Kent's house was the only building between the City and Kensington Village with the country between described as 'heavily timbered, with an abundance of wild life.'

In 1840, Dr Kent established the 'East Park Mill' located on First Creek between Little King William Street and North Terrace. In 1857, it became Logue's Brewery in King William Street.

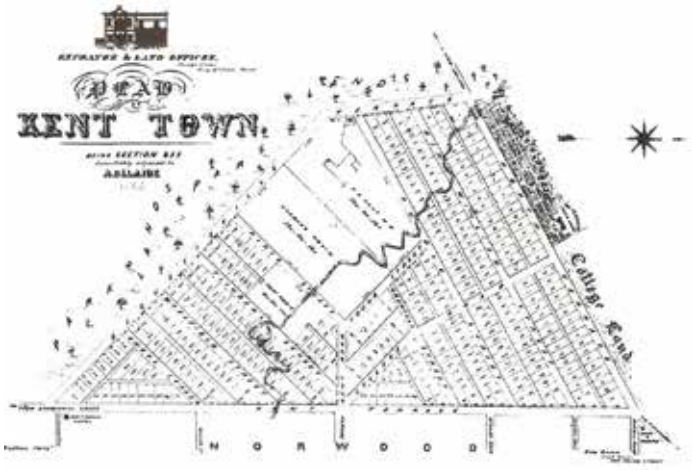
Kent's land was sold to Charles Robin, who paid compensation to Dr Kent and reserved for him thirteen acres on which East Park cottage stood.

Robin subdivided in 1854 and sold allotments for residential development. Prince Alfred College was established in 1869, on the remainder of what was Robin's land and Kent Town quickly developed into a residential area for the wealthy and their servants.

After the Second World War, Kent Town experienced significant change with development of medium-density housing and industry and manufacturing businesses moving in. The diverse mix of buildings and uses contribute to Kent Town's unique character.

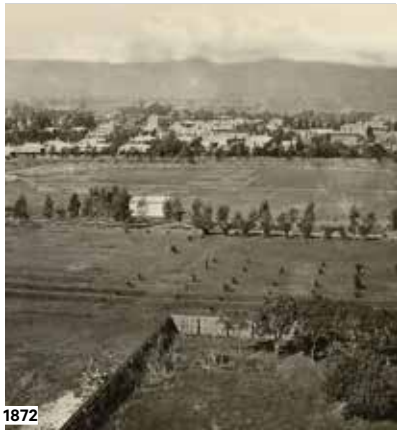


Plan of the District of Adelaide, 1839



Plan of Kent Town, 1854


Pre 1836


1872


1869


1876


1880


1900


1928



1984

Photos and plans courtesy of the State Library of South Australia and The City of Norwood, Payneham & St Peters

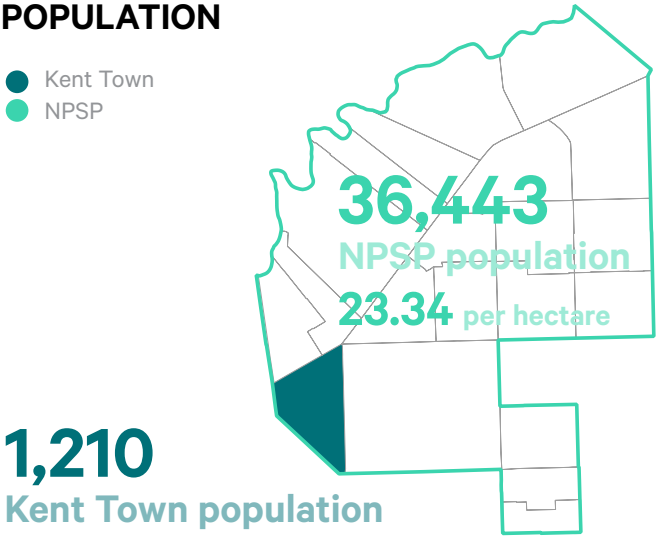
Kent Town Now

Kent Town is located within the South West corner of the City of Norwood Payneham & St Peters and is bound by Dequetteville Terrace, North Terrace and Fullarton Road.

Land use within Kent Town currently comprises residential, commercial, light industrial and institutional uses.

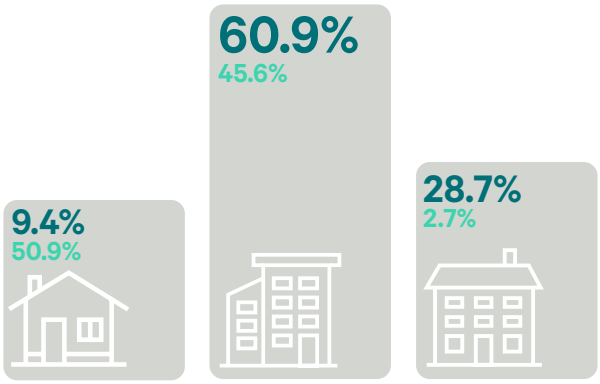
3.3% of Norwood Payneham & St Peters' total population currently live in Kent Town. Kent Town's population and density is set to increase as urban consolidation continues and development potential is realised.

POPULATION



1,210
Kent Town population
19.95 Persons per hectare

HOUSING



AGE

33 Kent Town median age
40 NPSP median age

Source: Population id



Facade of former John Martin & Co. Warehouse, Rundle Street



Little Rundle Street



Wakefield Street



Fullarton Road



'Shinka', Rundle Street



Prince Alfred College



Little Rundle Street



Rundle Street

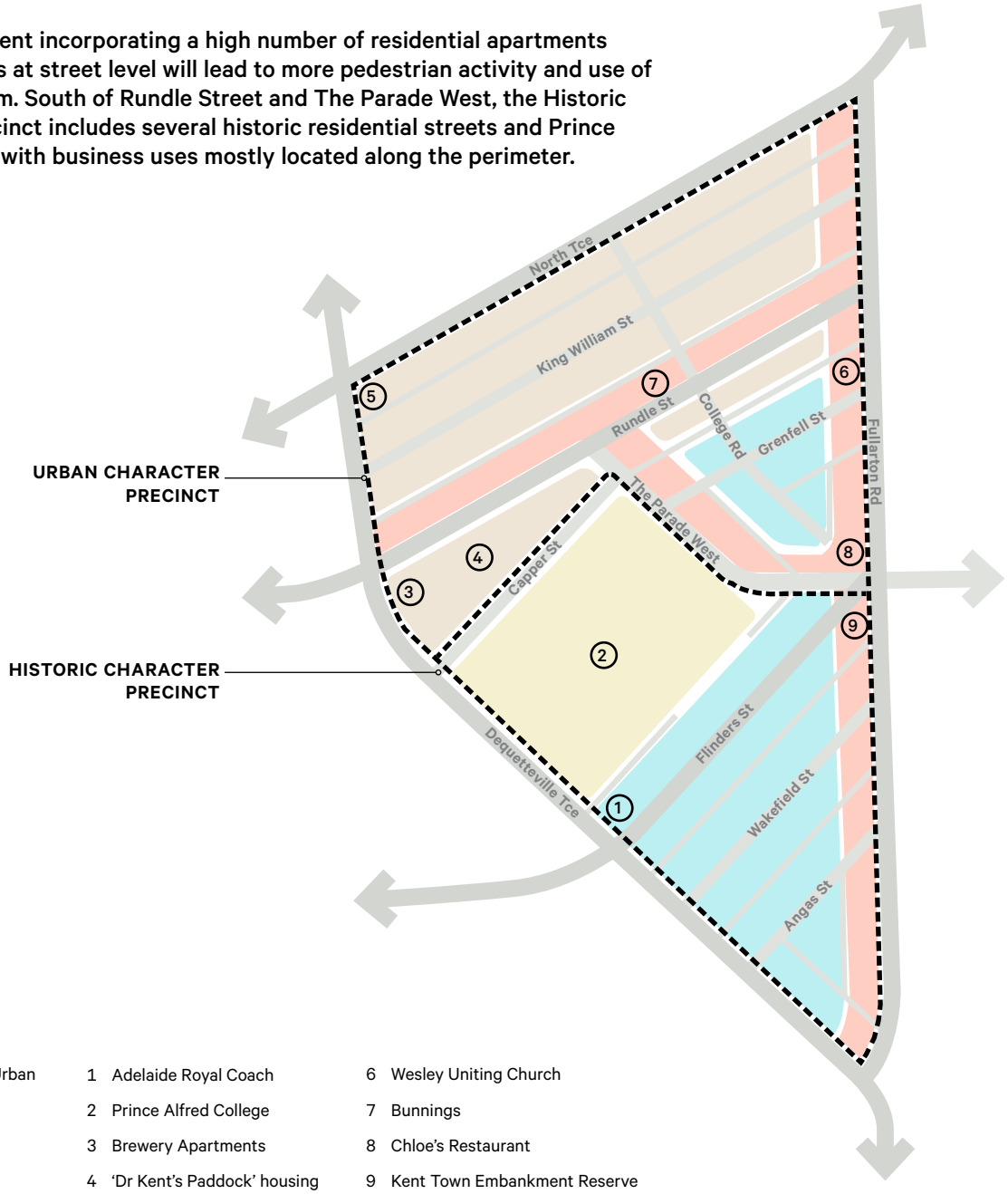
Photos of Kent Town now

Physical Character of Kent Town

The physical character of Kent Town is structured by its streets and land uses.

For the purpose of the Public Realm Manual, Kent Town has been divided into two character precincts: urban and historic. The Urban Character Precinct includes the northern portion of Kent Town and largely corresponds with the Urban Corridor Zone described in the Norwood, Payneham and St Peters (City) Development Plan.

New development incorporating a high number of residential apartments and mixed uses at street level will lead to more pedestrian activity and use of the public realm. South of Rundle Street and The Parade West, the Historic Character Precinct includes several historic residential streets and Prince Alfred College with business uses mostly located along the perimeter.



LEGEND

- Mixed Use Urban
- Commercial
- Residential
- Institutional

1 Adelaide Royal Coach
2 Prince Alfred College
3 Brewery Apartments
4 'Dr Kent's Paddock' housing
5 Royal Hotel
6 Wesley Uniting Church
7 Bunnings
8 Chloe's Restaurant
9 Kent Town Embankment Reserve

Kent Town Development Future

Since adoption of planning controls encouraging urban uplift, Kent Town has experienced change in the Urban Corridor Zone. The map below shows medium and high density development that is planned, under construction and built in Kent Town.



2-6 NORTH TCE



EAST PARK
1 KING WILLIAM ST



99 RUNDLE ST



2-4 KING WILLIAM ST



DEVELOPMENT STATUS (AUGUST 2018)

- Built
- Under Construction
- Planned



03

Street Types



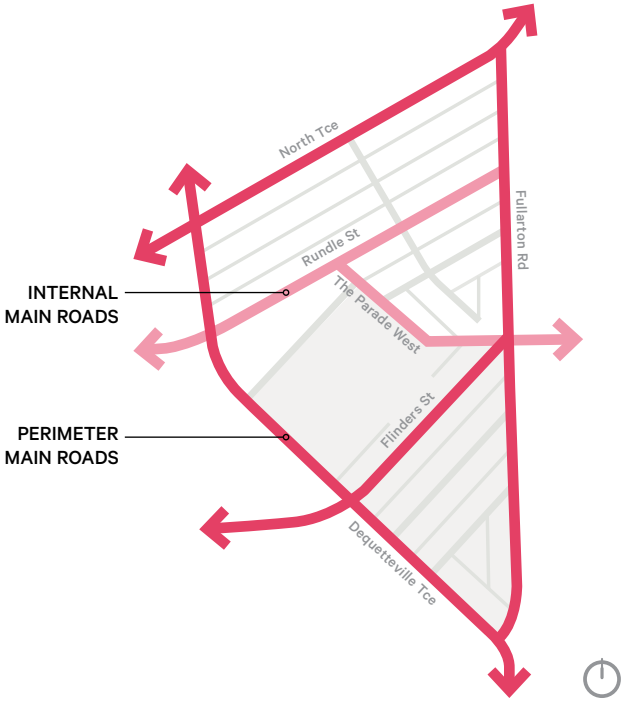
St Peters Street

St Peters, SA

Street Types

Fundamental to Kent Town's urban structure is the layout and hierarchy of its streets.

Three street types have been identified for their function and contribution to the Kent Town Public Realm.

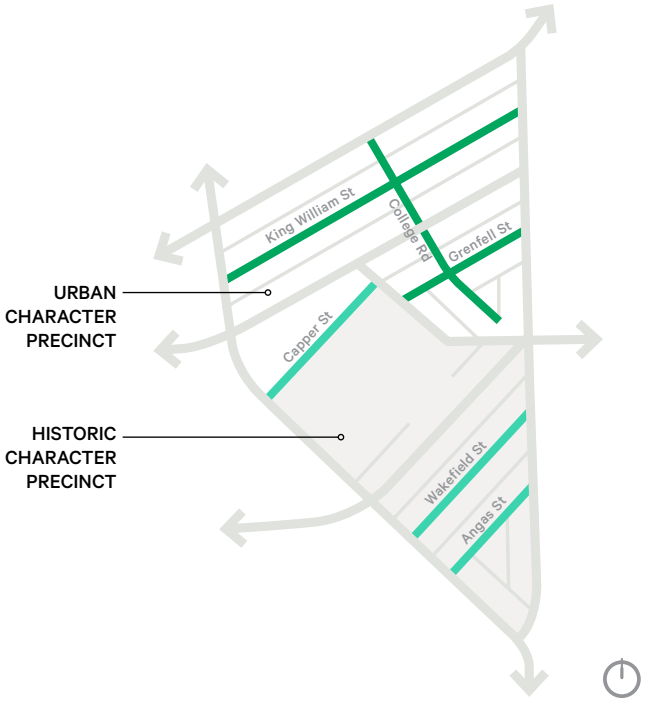


Main Roads

Main roads surround the perimeter of Kent Town and function as important gateways and movement corridors for vehicles, including public transport between the City and Eastern suburbs. Main roads include:

— North Terrace
— Fullarton Road
— Dequetteville Terrace
— Rundle Street
— The Parade West
— Flinders Street

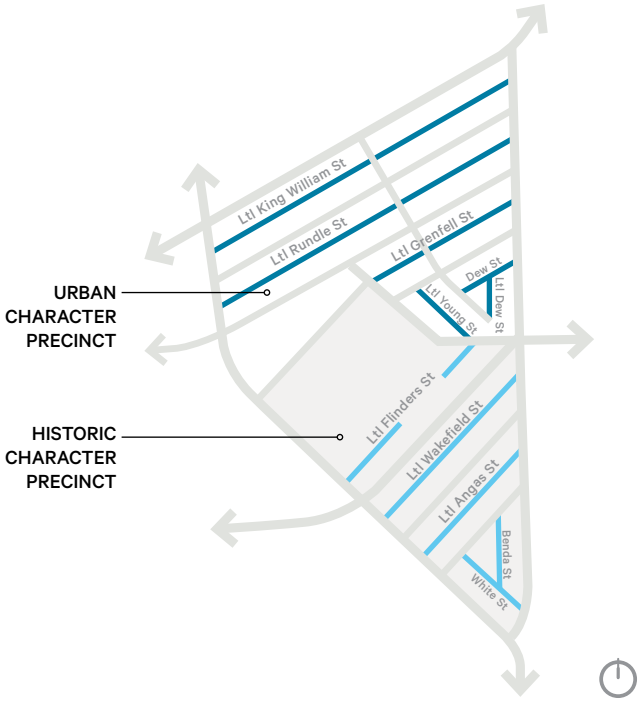
Internal and perimeter roads bound and intersect the urban and historic character precincts.



Streets

Streets support the local residential, commercial, industrial, retail and institutional uses, providing front door connections within Kent Town. Streets are found within both the urban and historic character precincts.

Both streets and laneways within the Urban Character Precinct are likely to change significantly as new medium to high density mixed use development is planned and built in the future.



Laneways

Laneways support local vehicle, pedestrian and cycle movements through Kent Town, servicing residential, retail, and industrial uses, generally as rear access found within both urban and historic character precincts. As redevelopment occurs the laneways are also starting to provide front door connections.

Main Roads
Perimeter Roads

OVERVIEW

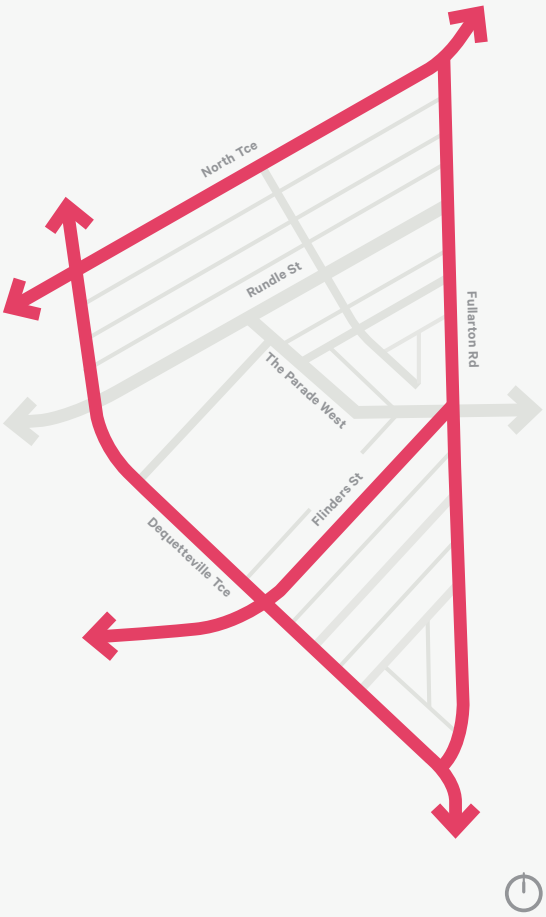
Perimeter main roads surround Kent Town and function as important vehicle corridors locally and within the wider metropolitan road network. Perimeter main roads:

— Support commuter cyclists and local pedestrian movement.
— Carry high volumes of traffic at higher speeds.
— Support public transport routes.
— Often carry high voltage power and other service infrastructure.
— Contribute to place identity and support economic activity.

OPPORTUNITIES

Perimeter main roads play an important role in the metropolitan road network and contribute to local character and sense of place. Perimeter roads provide places for activity and increased density of development. Perimeter main roads:

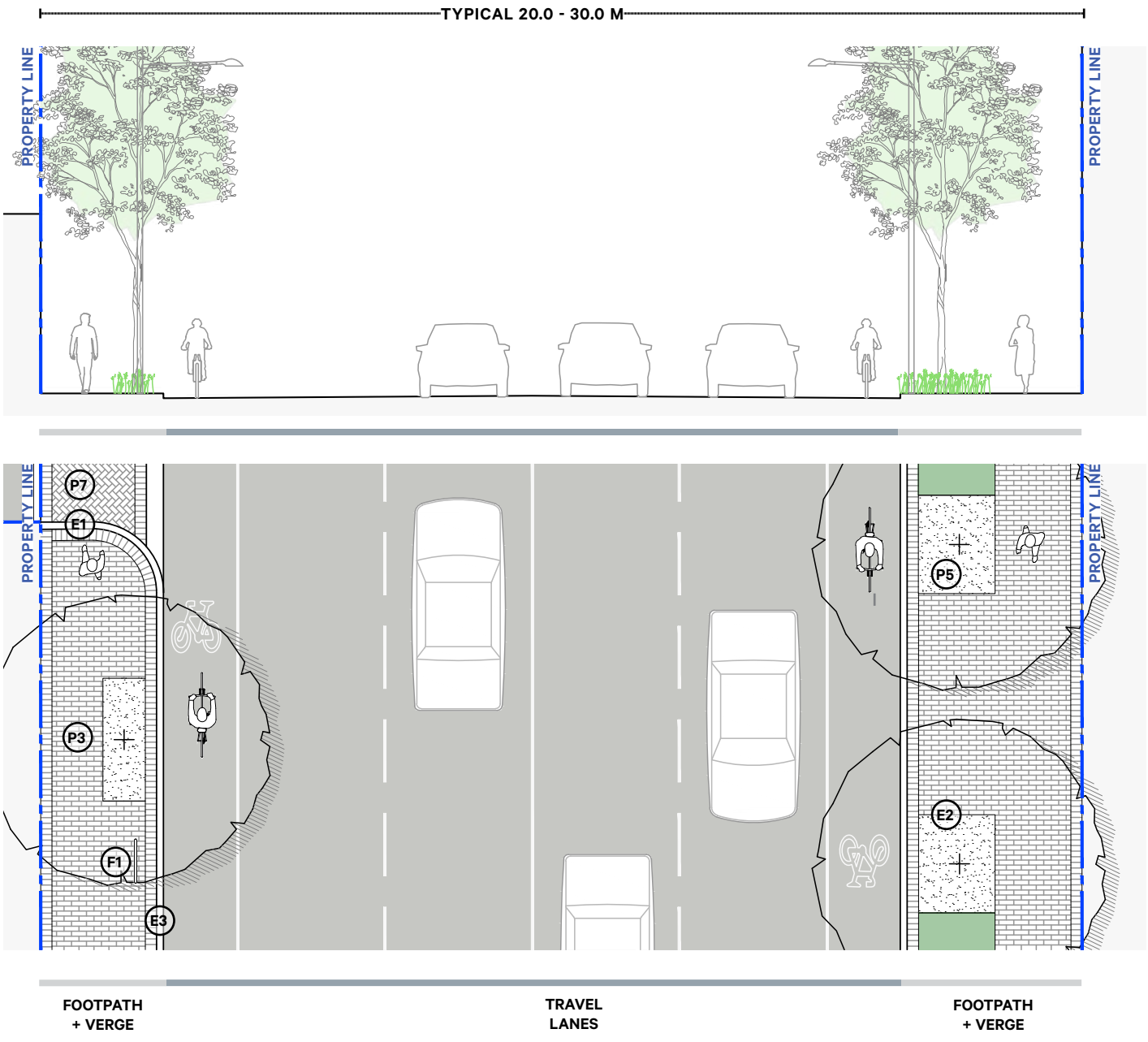
— Incorporate tree planting for amenity, visual scale and sense of place.
— Provide furniture, lighting, wayfinding and public art to create a vibrant and comfortable public realm.
— Encourage active frontages that engage with the streetscape.
— Reinforce character and sense of place.
— Consider power undergrounding to improve visual amenity.
— Support pedestrian and cycle movement locally and within the metropolitan network.
— Incorporate pedestrian crossings and refuge to support inter-block connections.





Existing Main Road 'Perimeter' Character, Fullarton Road

EXAMPLE PERIMETER ROAD LAYOUT - FULLARTON ROAD



LEGEND

- P3 UNIT PAVING 3
- P5 GRANULITIC SAND
- P7 PAVED CROSSOVER
- E1 CONCRETE EDGE
- E2 STEEL EDGE
- E3 CONCRETE KERB & WATERTABLE
- F1 CYCLE STAND
- GARDEN BED
- STREET TREE

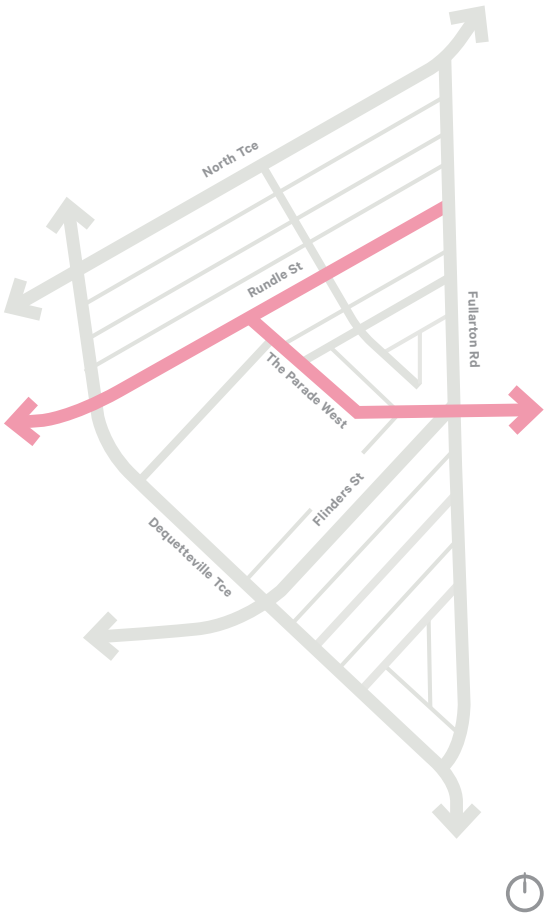
REFER SECTION 4 FOR ELEMENTS AND MATERIALS

Main Roads
Internal Roads

OVERVIEW

Internal main roads through Kent Town provide important routes for vehicles, public transport, bicycles and pedestrians. They cater for through traffic, and provide access to public transport, shops, schools and private property. Lower vehicle speeds allow for a more comfortable pedestrian and cycling environment. Internal main roads:

— Collect traffic exiting from perimeter roads.
— Carry high volumes of traffic at lower speeds, including public transport.
— Incorporate street parking and narrower traffic lanes to slow vehicles.



OPPORTUNITIES

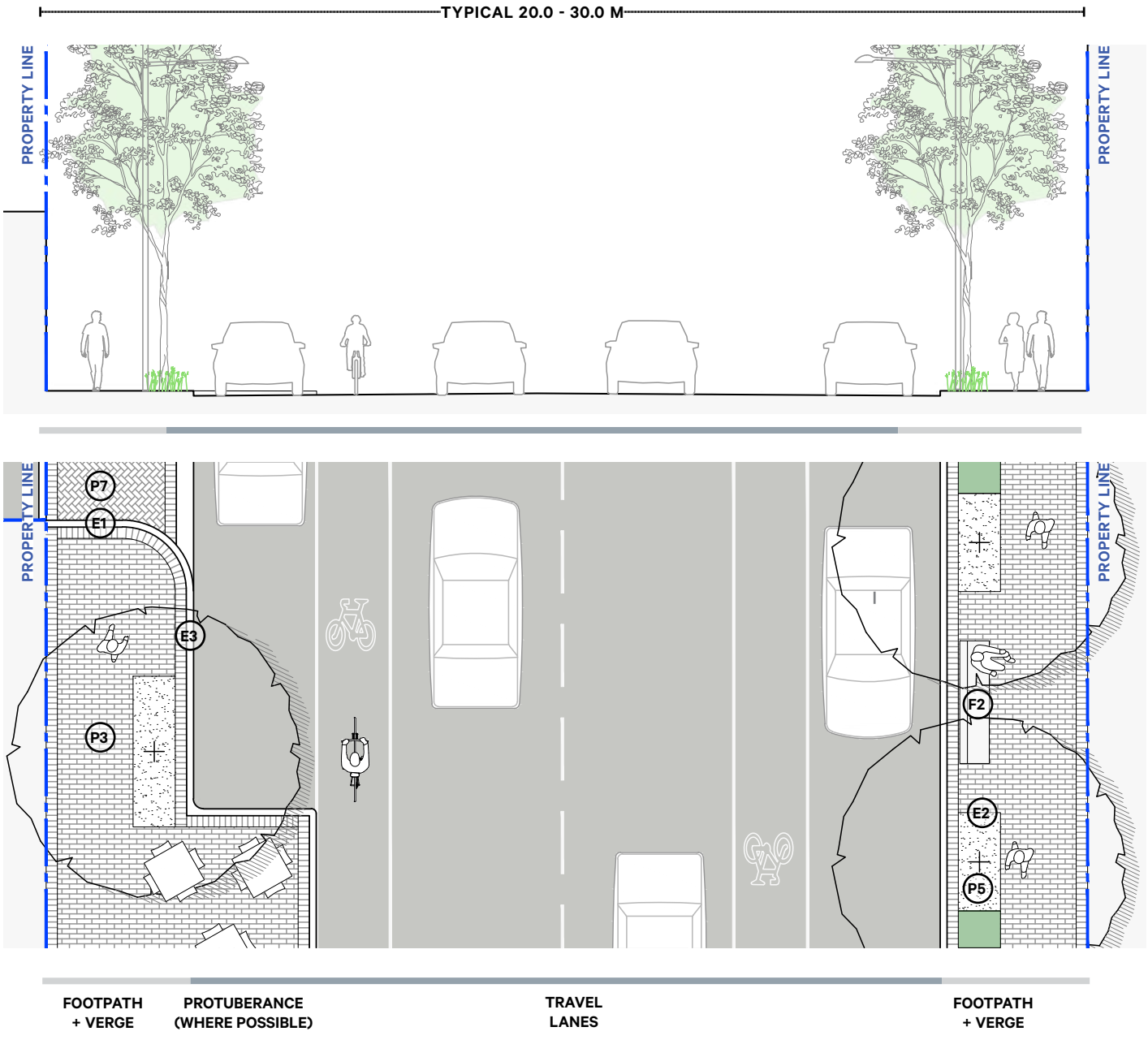
Internal roads play an important role in providing places for activity and increased density of development. Well designed internal main roads support an active and comfortable public realm and contribute to urban uplift. Internal main roads:

— Reinforce the character of Kent Town.
— Support large trees that provide amenity and visual scale.
— Function as transit corridors for public transport, vehicles, pedestrians and cyclists.
— Provide a vibrant and comfortable public realm.
— Encourage active frontages that engage with the streetscape.
— Consider power undergrounding and common service trenching.
— Integrate public art and interpretation.
— Incorporate wayfinding to acknowledge and identify major intersections and destinations.



Existing Main Road 'Internal' Character, Rundle Street

EXAMPLE INTERNAL ROAD LAYOUT - RUNDLE ROAD



LEGEND

- P3 UNIT PAVING 3
- P5 GRANULITIC SAND
- P7 PAVED CROSSOVER
- E1 CONCRETE EDGE
- E2 STEEL EDGE
- E3 CONCRETE KERB & WATERTABLE
- F2 BENCH SEAT
- GARDEN BED
- STREET TREE

REFER SECTION 4 FOR ELEMENTS AND MATERIALS

Streets
Urban Character Precinct

OVERVIEW

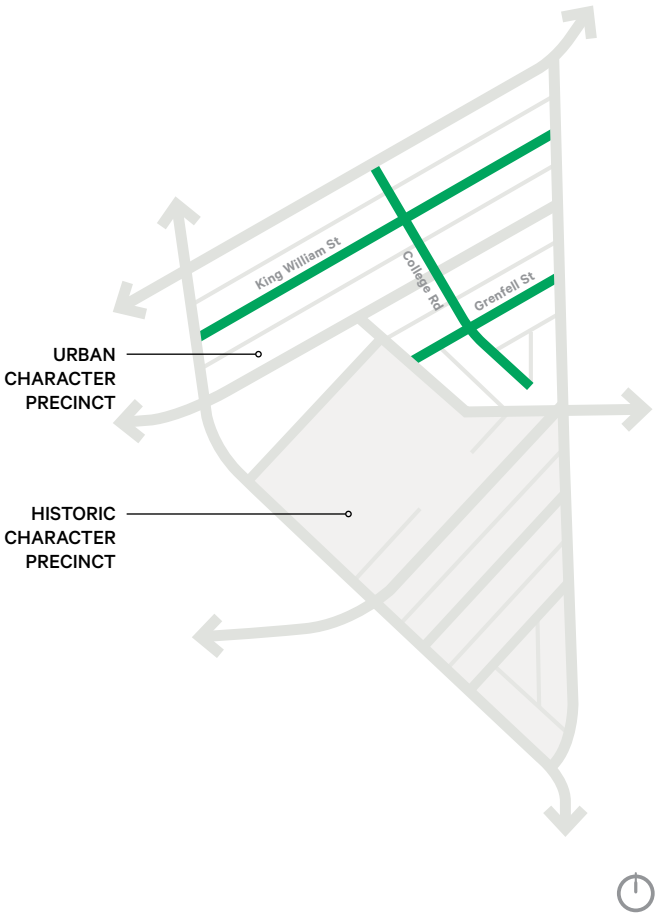
Streets within the Urban Character Precinct provide access to residential, commercial, industrial, retail and institutional allotments. Urban character streets are characterised by:

— Low traffic speeds and volumes.
— Safe and accessible pedestrian and cycling connections.
— On-street parking.

OPPORTUNITIES

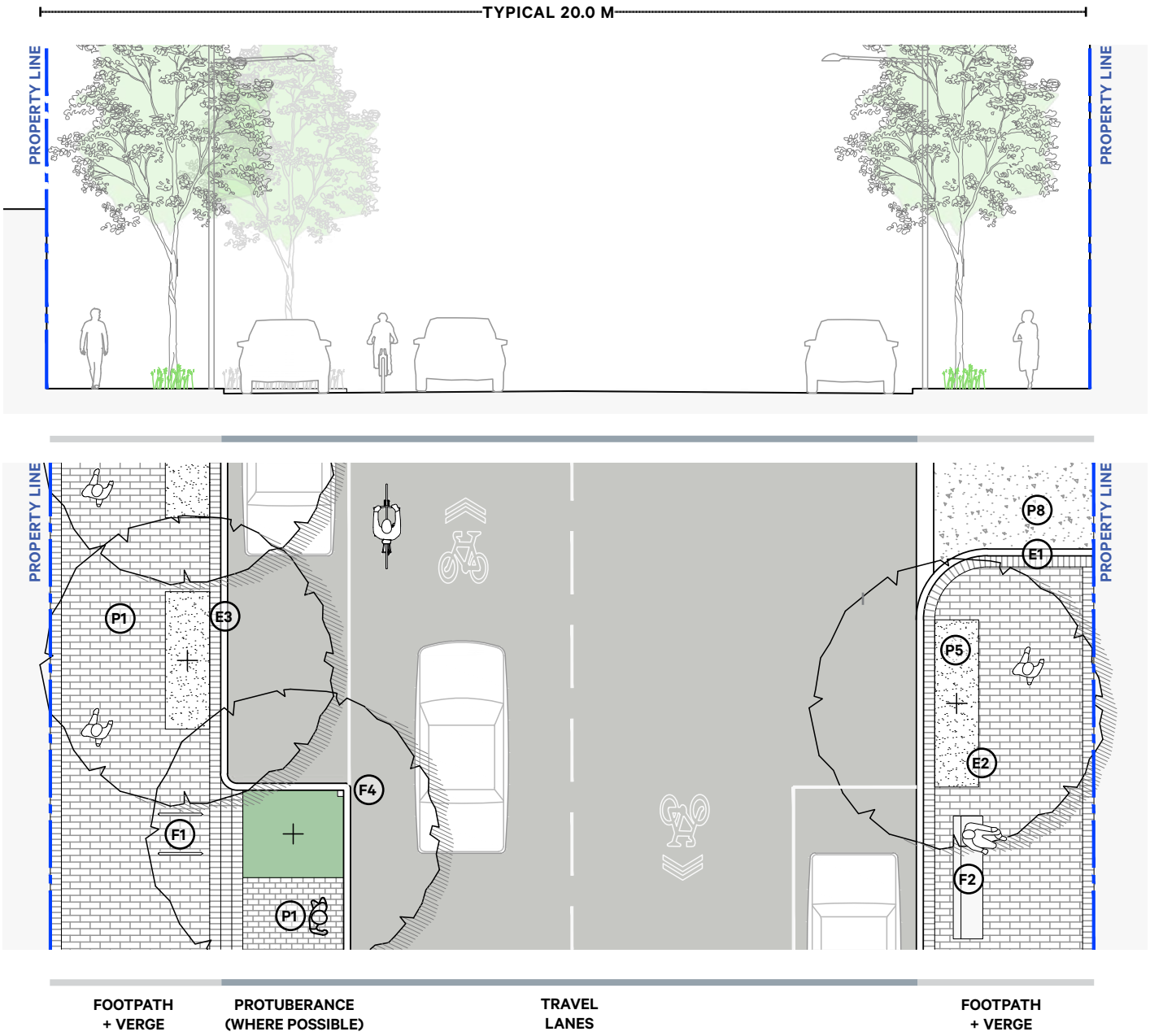
Streets within the Urban Character Precinct:

— Provide important places for locals to meet and interact on a daily basis.
— Support walking and cycling through the provision of continuous footpaths on both sides of the street.
— Offer on-street parking.
— Support local 'corner shop' development, including protuberances for outdoor activity.
— Accommodate distinctive street trees that contribute to local character and provide shade for pedestrians and parked cars.
— Support water sensitive urban design.
— Aim to reduce the impact of infrastructure through the consolidation of services in common service trenches.
— Support reduced traffic speeds and volumes through integrated traffic calming devices.
— Support a mixed use environment.
— Incorporate pedestrian refuges.




Existing character, College Road

EXAMPLE STREET LAYOUT - KING WILLIAM STREET



LEGEND

- P1 UNIT PAVING 1
- P5 GRANULITIC SAND
- P8 CONCRETE CROSSOVER
- E1 CONCRETE EDGE
- E2 STEEL EDGE
- E3 CONCRETE KERB & WATERTABLE
- F1 BIKE STAND
- F2 BENCH SEAT
- F4 BOLLARD
- GARDEN BED
- STREET TREE

REFER SECTION 4 FOR ELEMENTS AND MATERIALS

Streets
Historic Character Precinct

OVERVIEW

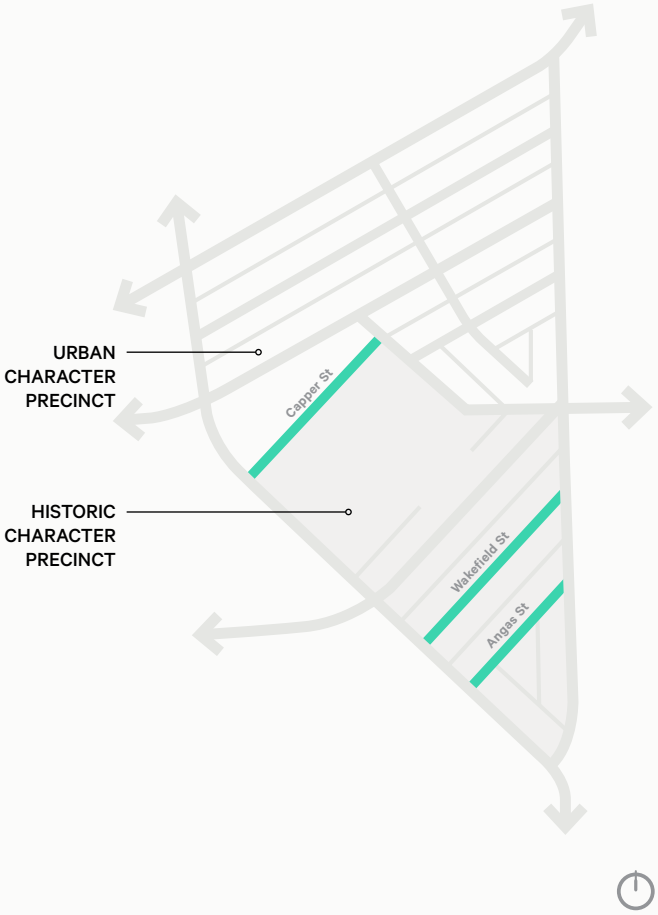
Streets within the Historic Character Precinct primarily service residential allotments and support vehicle, pedestrian and cycle movement through Kent Town. Historic character streets are characterised by:

— Low traffic speeds and volumes.
— Safe and accessible pedestrian and cycling connections.
— On-street parking.

OPPORTUNITIES

Streets within the Historic Character Precinct:

— Support walking and cycling through the provision of continuous footpaths on both sides of the street, where possible.
— Offer on-street parking.
— Accommodate distinctive street trees that contribute to local character and provide shade for pedestrians and parked cars.
— Support water sensitive urban design.
— Aim to reduce the impact of infrastructure through the consolidation of services in common service trenches.
— Support reduced traffic speeds and volumes through integrated traffic calming devices.





Existing character, Wakefield Street

EXAMPLE STREET LAYOUT - WAKEFIELD STREET



LEGEND

- P2 — UNIT PAVING 2
- P5 — GRANULITIC SAND
- E4 — STONE KERB & CONCRETE WATERTABLE
- GARDEN BED
- LAWN (EXISTING ONLY)
- STREET TREE

REFER SECTION 4
FOR ELEMENTS AND
MATERIALS

Laneways

OVERVIEW

Laneways are relatively free of traffic and provide access to residential and commercial allotments. They improve pedestrian permeability through the precinct. Laneways are characterised by:

— Slow traffic speed.
— Low traffic volumes.
— Lower service standards (e.g number of footpaths or furniture).

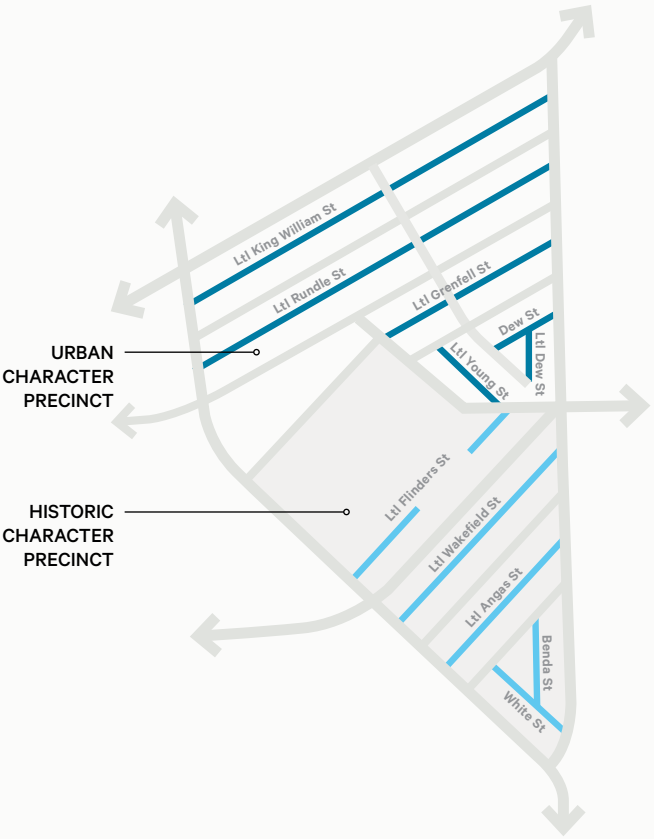
OPPORTUNITIES

Laneways are the 'fine grain' within the street network. Laneways:

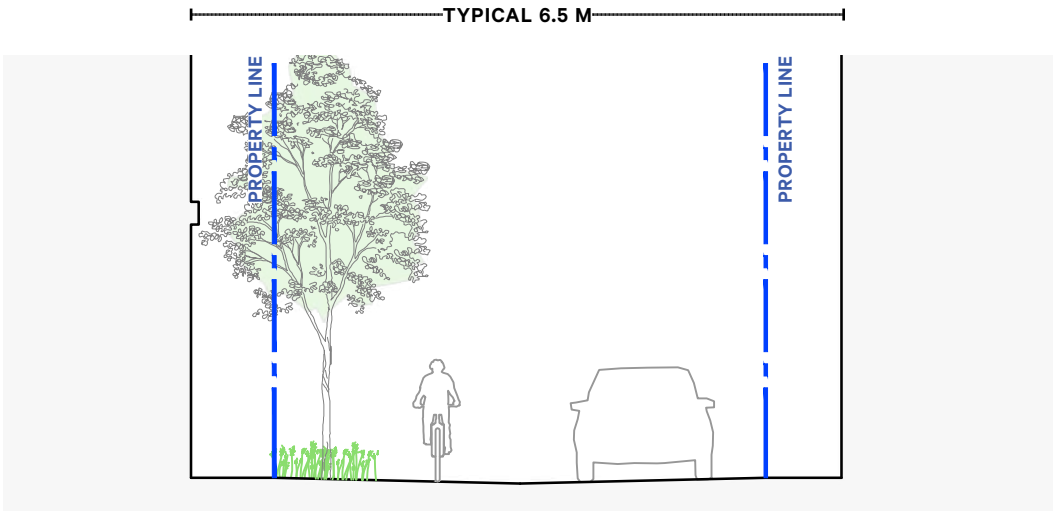
— Support walking and cycling movement.
— Support vehicle access and servicing of allotments.
— Accommodate greening where possible, including tree plantings and vertical greening of fences/walls.
— Incorporate public art and signage to reflect and enrich the character of the area.
— May incorporate lighting to suit higher use routes.

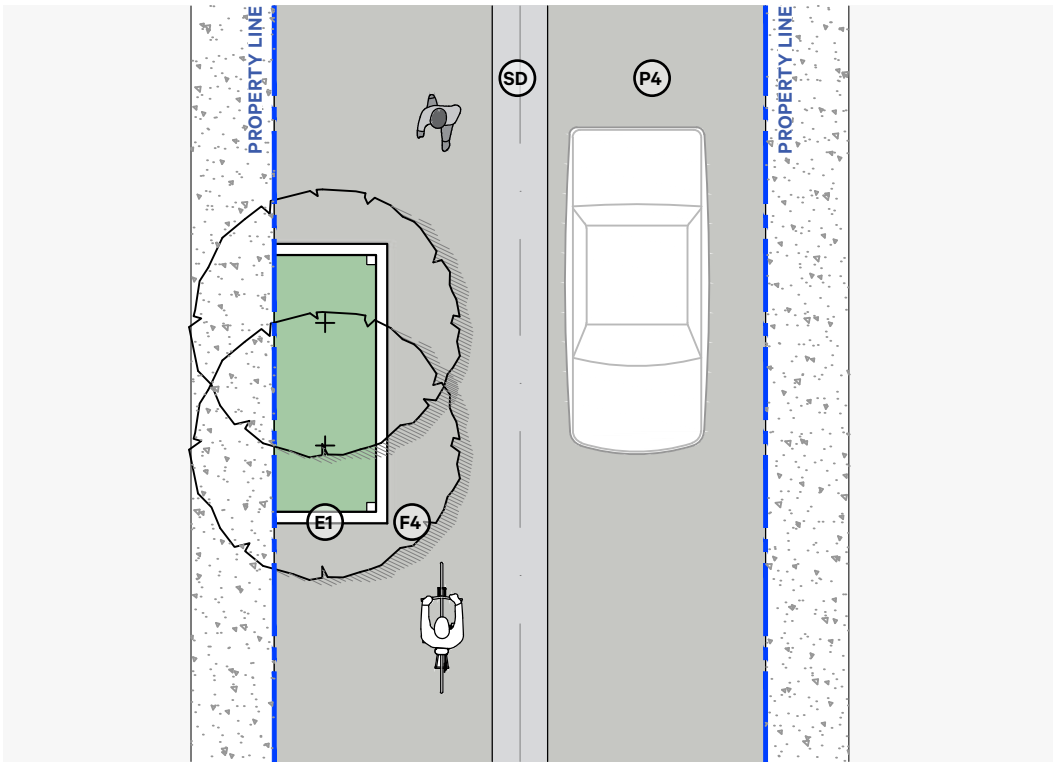


Existing laneway character, Little Rundle Street



EXAMPLE LANEWAY LAYOUT - LITTLE RUNDLE STREET





SET BACK | GARDEN BED | TRAVEL LANES | SET BACK

LEGEND

- P4 — ASPHALTIC CONCRETE
- SD — SPOON DRAIN
  P9 - URBAN CHARACTER PRECINCT
  P10 - HISTORIC CHARACTER PRECINCT
- E1 — CONCRETE EDGE
- F4 — BOLLARD
- GARDEN BED

REFER SECTION 4 FOR ELEMENTS AND MATERIALS


La VERDE 58

04

Public Realm Elements



Verde Apartments Streetscape
Kent Town, SA

Principles for the Public Realm

The following principles guide the selection of materials and elements proposed for use within the Kent Town Public Realm.

01
Sense of Place

Kent Town's unique sense of place and character is reinforced with elements that provide a distinctive, consistent and attractive aesthetic.

02
Quality

Public realm and built quality in Kent Town is supported with a selection of high quality and enduring urban elements.

03
Function

Equitable and accessible use of the public realm is supported with a selection of comfortable and functional urban elements.

04
Consistency

Public realm consistency is supported by a coordinated suite of elements. Common materials, colours and themes are used.

05
Integration

Elements are integrated with each respective setting rather than being a dominating element.

06
Durability

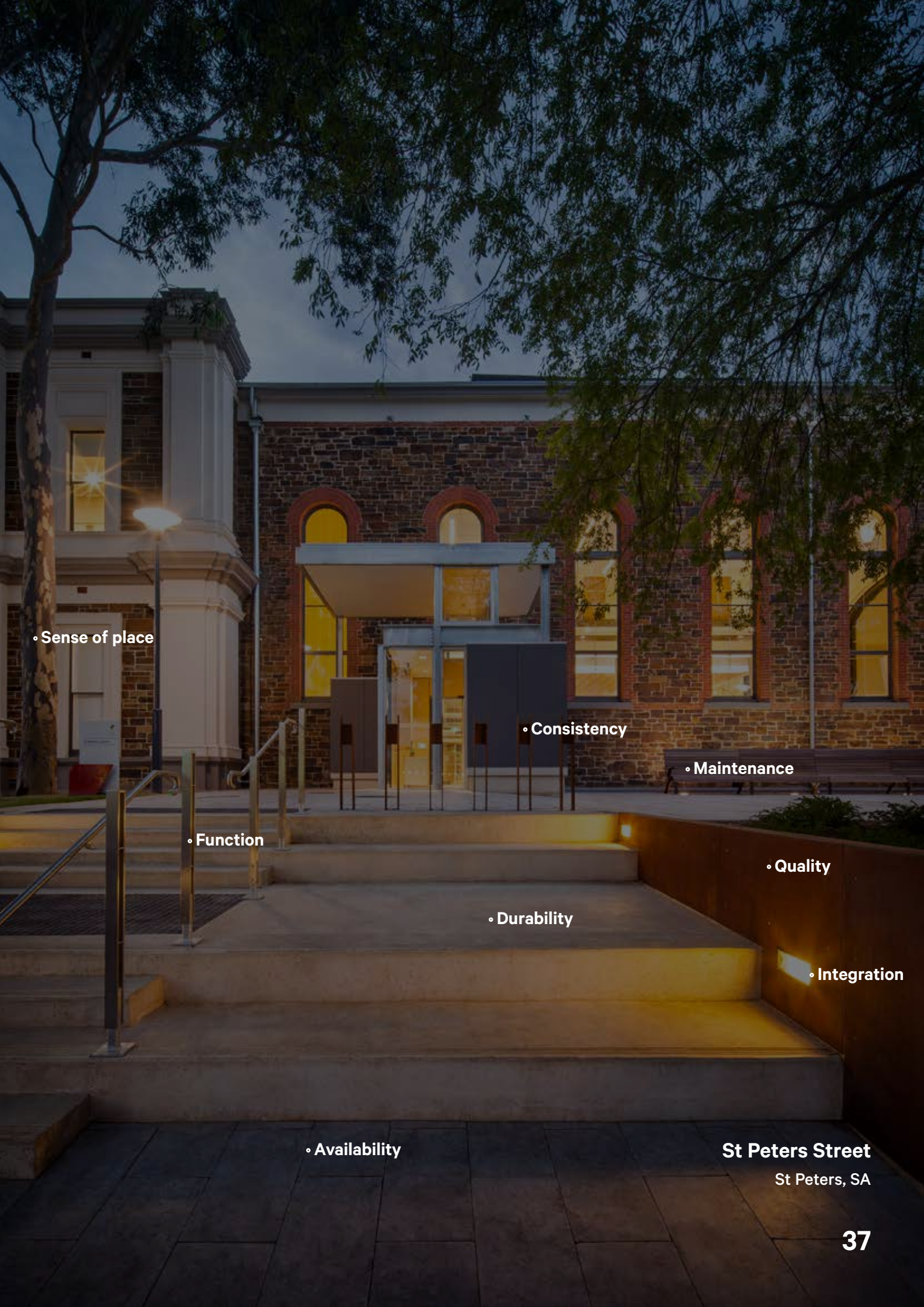
Elements are robust and long lasting. Whole-of-life costs are considered.

07
Availability

Elements are readily available and from more than one supplier where possible - to ensure competitive and timely supply.

08
Maintenance

Maintenance and management requirements are considered to ensure longevity.



St Peters Street
St Peters, SA

Public Realm Elements

The following public realm elements are covered in this manual.







P
Paving & Surfaces

— Paving
— Edges
— Kerbs
— Tactile Indicators
— Spoon Drains

F
Furniture

— Seats
— Cycle Stands
— Pedestrian Barriers
— Bollards
— Bin Surrounds

G
Planting

— Trees
— Planting





S
Signage

— Street Name Signs
— Interpretive Signs

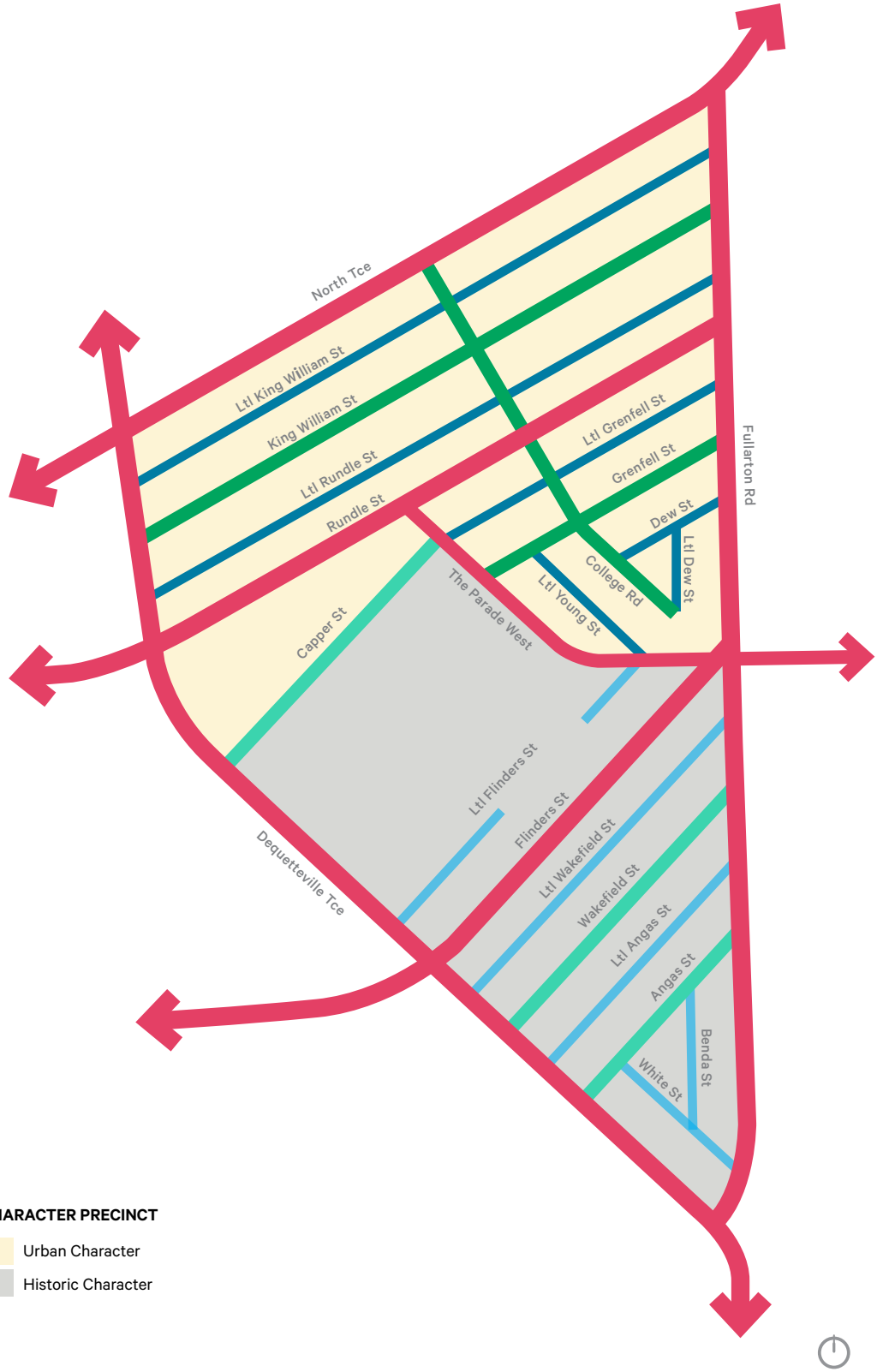
A
Public art

— Public Art

Applying the Elements

The below diagram illustrates where public realm elements are to be applied in Kent Town.

— Determine the street type and character precinct for your site.
— Refer to the table on the next page to identify the appropriate elements to use.
— Refer to the example layouts in Section 3 - Street Types to understand how elements are to be set out and used.
— Consult Council staff on the design and obtain Council's approval prior to construction. As all public realm assets are owned and maintained by the City of Norwood, Payneham and St Peters, all standards must be adhered to.



STREET TYPE

- Main Road
- Street - Urban Character
- Street - Historic Character
- Laneway - Urban Character
- Laneway - Historic Character

CHARACTER PRECINCT

- Urban Character
- Historic Character

APPLICATION TABLE

STREET TYPE	PRIMARY PAVING	CROSSOVER	KERB & WATERTABLE	SPOON DRAIN	VERGE
Main Road	P3 - Clay Unit Paver - Littlehampton 'Stardust'	P7 - Paved Crossover - Littlehampton 'Stardust'	E3 - Concrete Kerb & Watertable	-	P5 - Compacted Granulitic Sand Garden Bed Planting Trees
Streets URBAN CHARACTER PRECINCT	P1 - Concrete Unit Paver - Boral 'Longo'	P8 - Concrete Crossover	E3 - Concrete Kerb & Watertable	-	P5 - Compacted Granulitic Sand Garden Bed Planting Trees
Streets HISTORIC CHARACTER PRECINCT	P2 - Concrete Unit Paver - 'Adbri Hollandstone'	P2 - Concrete Unit Paver - 'Adbri Hollandstone'	E4 - Stone Kerb & Concrete Watertable	-	P5 - Compacted Granulitic Sand Garden Bed Planting Lawn (where existing) Trees
Laneways URBAN CHARACTER PRECINCT	P4 - Asphaltic Concrete	-	E1 - Concrete Edge	P9 - Concrete Spoon Drain	P5 - Compacted Granulitic Sand Garden Bed Planting Trees
Laneways HISTORIC CHARACTER PRECINCT	P4 - Asphaltic Concrete	-	E1 - Concrete Edge	P10 - Stone Spoon Drain	P5 - Compacted Granulitic Sand Garden Bed Planting Trees

P

Paving & Surfaces

STANDARD PAVING & SURFACES

P1 - Unit Paving 1 - Concrete Unit Paving

P2 - Unit Paving 2 - Concrete Unit Paving

P3 - Unit Paving 3 - Clay Unit Paving

P4 - Asphaltic Concrete

P5 - Compacted Granulitic Sand

P6 - Tactiles

P7 - Paved Crossover

P8 - Concrete Crossover

P9 - Concrete Spoon Drain

P10 - Stone Paved Spoon Drains

STANDARD EDGE CONDITIONS

E1 - Concrete Edge

E2 - Steel Edge

E3 - Concrete Kerb & Watertable

E4 - Stone Kerb & Watertable



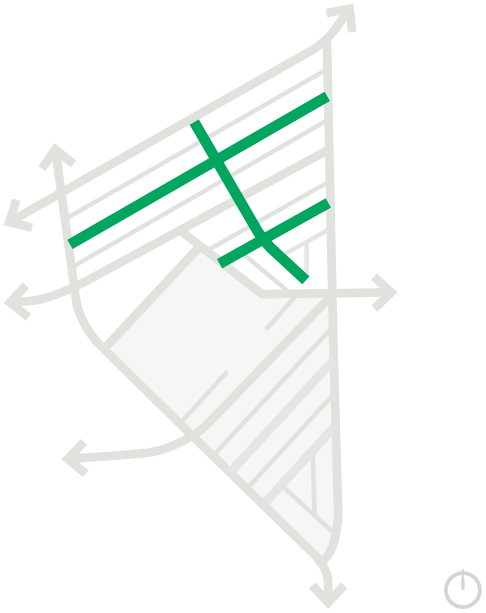
Verde Apartments Streetscape

Kent Town, SA

City of
Norwood
Payneham
& St Peters

P1

Unit Paving 1 - Concrete Unit Paving



DESCRIPTION	'Longo' concrete unit paver.
COLOUR	Charcoal (85%) & Oyster (15%).
FINISH	Light Shot Blast.
DIMENSION	250mm x 85mm x 60mm.
SUPPLIER	Boral.
PERFORMANCE REQUIREMENTS	— Compacted subgrade and base to suit application. — Tolerance of max +/- 2mm lippage. — Slip Resistance to comply with AS 4586. — Not vehicle rated. — Random colour mix. — Stretcher bond pattern with header course.
MAINTENANCE	— General cleaning. — Lift broken/chipped pavers and replace.
USES	— Streets in Urban Character Precinct - primary paving.

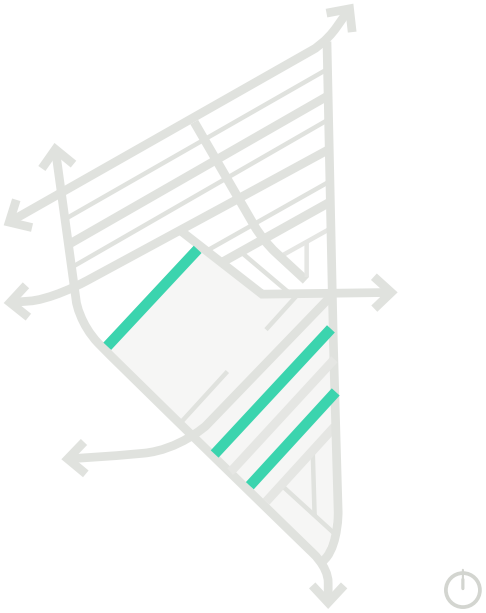


Random colour mix (charcoal 85%, Oyster 15%) in stretcher bond pattern

City of Norwood Payneham & St Peters

P2

Unit Paving 2 - Concrete Unit Paving



DESCRIPTION	'Hollandstone' concrete unit paver.
COLOUR	Port Blend.
FINISH	Standard.
DIMENSION	220mm x 110mm x 80mm.
SUPPLIER	Adbri.
PERFORMANCE REQUIREMENTS	— Compacted subgrade and bedding sand to suit application. — Heavy vehicle load rated. — To comply with Australian Standards for slip & skid resistance. — Tolerance of +/- 2mm lippage. — Utilise matching Abri 'Hollandstone' pavers as headers as required. — Paving pattern to suit application - typically herringbone with header course.
MAINTENANCE	— General cleaning. — Infill of paving sand. — Lift broken/chipped pavers and replace.
USES	— Streets in Historic Character Precinct - primary paving and crossovers.



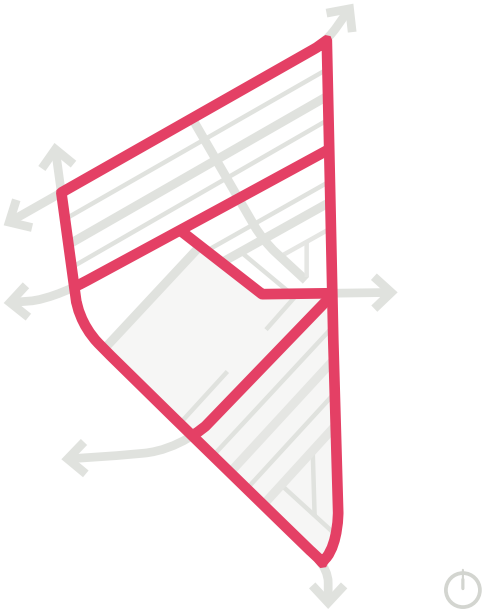
Example pavers (herringbone pattern)

City of Norwood Payneham & St Peters

P3

Unit Paving 3 - Clay Unit Paving

DESCRIPTION	'Stardust' clay unit paver.
COLOUR/FINISH	Cannon.
DIMENSIONS	230mm x 76mm x 50mm.
SUPPLIER	Littlehampton Bricks.
PERFORMANCE REQUIREMENTS	— To comply with Australian Standards for slip & skid resistance. — Tolerance of +/- 2mm lippage. — Stretcherbond paving pattern with header course. — Laid on sand and rubble base to engineer's requirements.
MAINTENANCE	— General cleaning. — Infill of paving sand. — Lift broken/chipped pavers and replace.
USES	— Main roads - primary paving.



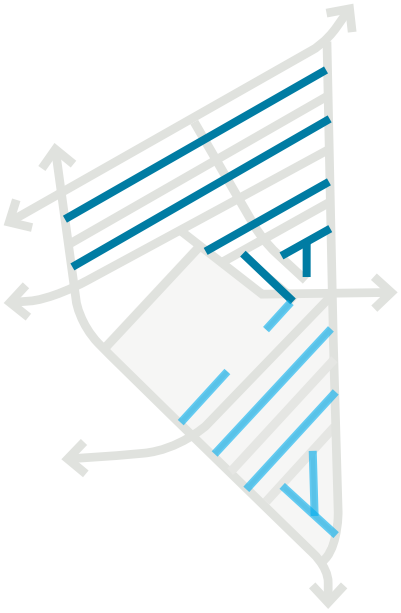


Example pavers (stretcher bond pattern)

City of
Norwood
Payneham
& St Peters

Asphaltic Concrete

DESCRIPTION	Asphaltic concrete.
MATERIAL & COLOUR	Standard asphaltic concrete black.
FINISH	Rolled smooth.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— AC7 - Primary-use by pedestrian and cycles. — AC10 - Primary-use by vehicles. — Restrained edges all sides.
MAINTENANCE	— Patch any cracks, general cleaning.
USES	— Laneways - road paving.





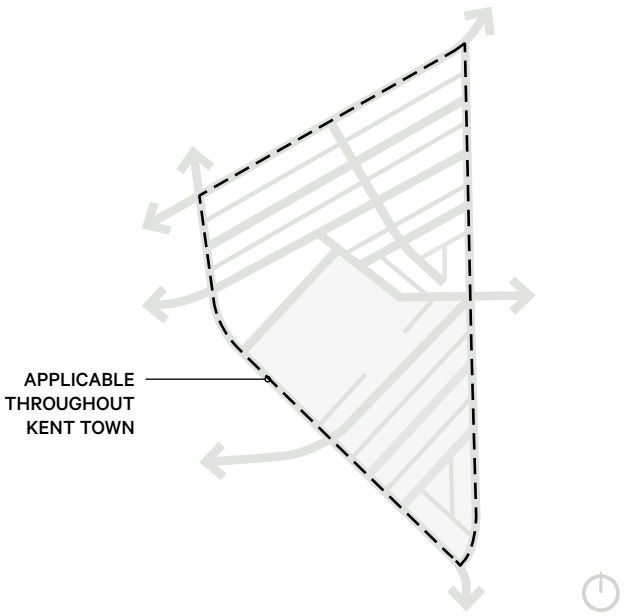
Typical asphalt finish

City of
Norwood
Payneham
& St Peters

P5

Compacted Granulitic Sand

DESCRIPTION	8.0 mm Quarry Sand with soil bond.
FINISH	Compacted.
SUPPLIER	Fitzgeralds Quarry.
PERFORMANCE REQUIREMENTS	— Compacted subgrade to suit application. — Install in flat areas only - max grade 1:50 or 2%. — Lightly tamped within 750mm of adjacent tree.
MAINTENANCE	— Top up infill and compacting as required. — Removal of surface weed growth as required.
USES	— Verges and tree pits - primary treatment.





Granulitic sand in verge surrounding tree

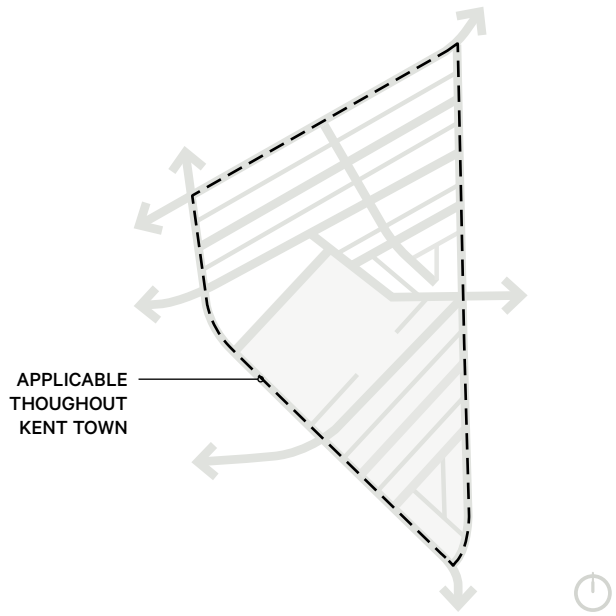
Granulitic sand in verge surrounding tree

City of
Norwood
Payneham
& St Peters

P6

Tactiles

DESCRIPTION	Tactile Ground Surface Indicators.
MATERIAL & FINISH	Precast concrete unit pavers - Charcoal.
SUPPLIER	Best Pavers or similar approved.
PERFORMANCE REQUIREMENTS	— Install to Australian Standards including colour contrast with paving surface. — Heavy duty fixing technique to manufacturers specifications. — Tactiles must be set into the ramp surface to warn pedestrians that the edge of a road has been reached.
MAINTENANCE	— General cleaning and replacement of tactiles if necessary. — Cracks or chips in surface to be made good to avoid trip hazards.
USES	— Where required.





Warning tactiles installed in kerb ramp



Warning tactile



Directional tactile

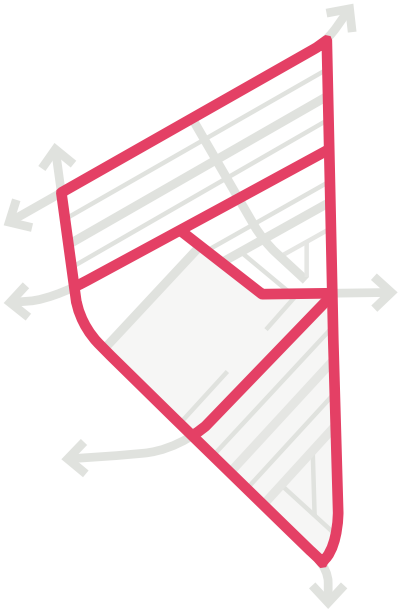
Warning tactiles installed in kerb ramp

City of
Norwood
Payneham
& St Peters

P7

Paved Crossover

DESCRIPTION & MATERIAL	'Stardust' clay unit paver.
COLOUR/FINISH	Cannon.
DIMENSIONS	230mm x 76mm x 50mm.
SUPPLIER	Littlehampton Bricks.
PERFORMANCE REQUIREMENTS	— To comply with Australian Standards for slip & skid resistance. — Tolerance of +/- 2mm lippage. — Herringbone paving pattern with header course. — Laid on mortar bed and concrete base with grout joints to engineer's requirements. — Alternative: laid on edge (76mm thick) on sand and rubble base to engineer's requirements.
MAINTENANCE	— General cleaning. — Infill of paving sand. — Lift broken/chipped pavers and replace.
USES	— Main roads - crossovers.





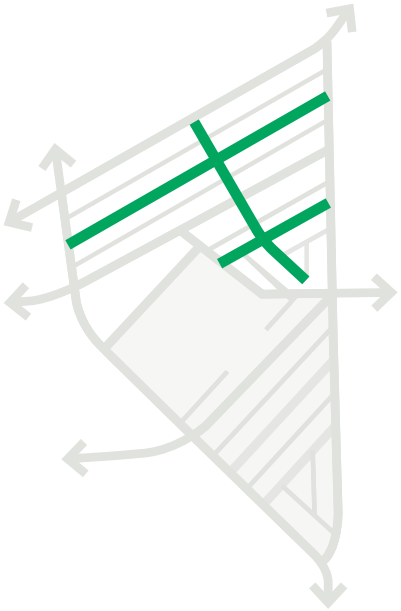
Example paved crossovers (herringbone)

Example paved crossovers (herringbone)

City of
Norwood
Payneham
& St Peters

P8

Concrete Crossover



DESCRIPTION	Insitu reinforced concrete.
MATERIAL & FINISH	Inverts – smooth steel trowel. Crossover – washed 1mm reveal.
SUPPLIER	Hanson, Premix or equal.
PERFORMANCE REQUIREMENTS	— 120mm thick N32 concrete reinforced. — 100mm compacted sub-base. — No lip between invert and watertable unless specified. — Invert must be formed from one piece of concrete. Invert and crossover to be located clear of stobie pole, street tree etc. — To comply with Australian Standards for slip & skid resistance. — Tolerance of max +/- 2mm lippage.
MAINTENANCE	— General cleaning.
USES	— Streets in Urban Character Precinct.



Example washed finish (1mm reveal)

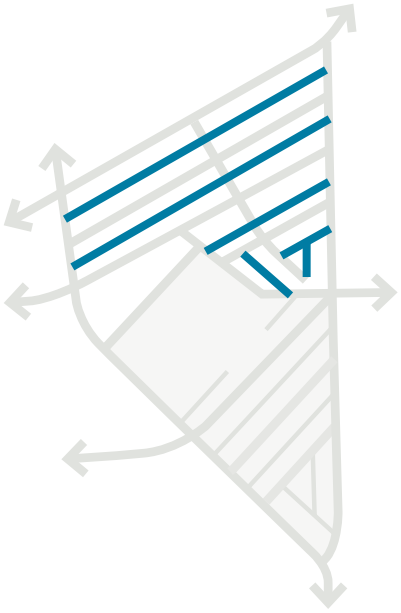
Example washed finish (1mm reveal)

City of
Norwood
Payneham
& St Peters

P9

Concrete Spoon Drain

DESCRIPTION	Insitu concrete spoon drain.
COLOUR	Portland Grey.
MATERIAL & FINISH	N32 concrete reinforced: smooth steel trowel finish.
DIMENSION	Thickness: Width: 450mm Low traffic loads: 200mm Heavy vehicle traffic loads: 300mm
SUPPLIER	Hanson, Premix or equal.
PERFORMANCE REQUIREMENTS	— Reinforced to suit vehicle uses.
MAINTENANCE	— General street cleaning. — Annual inspection of stormwater inlets and cleaning out as required.
USES	— Laneways in Urban Character Precinct.





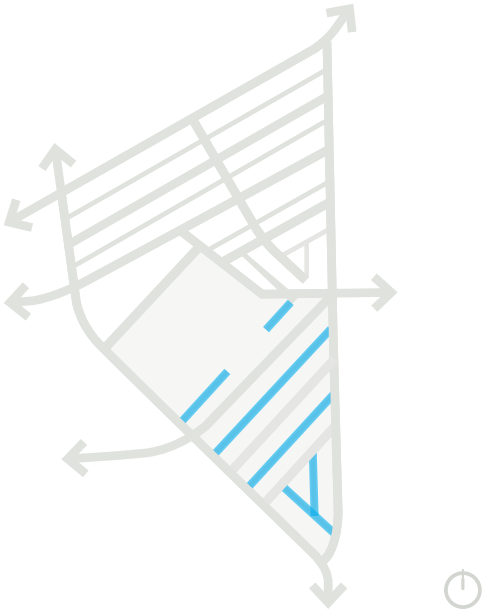
Example concrete spoon drain with grated inlet

Example concrete spoon drain with grated inlet

City of
Norwood
Payneham
& St Peters

P10

Stone Paved Spoon Drains



DESCRIPTION	Stone block paving spoon drainage.
COLOUR	Bluestone.
FINISH	Split face.
DIMENSION	450mm wide.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— Construction to engineers specification.
MAINTENANCE	— General cleaning. — Lift broken/chipped pavers and replace. — Cracks or chips in surface to be made good to avoid trip hazards.
USES	— Laneways in Historic Character Precinct.
NOTE	— A charcoal coloured concrete spoon drain (i.e. Portland Grey cement with black oxide) is an acceptable alternative for use in the Historic Character Precinct where budget or other constraints do not allow construction of a stone paved spoon drain.

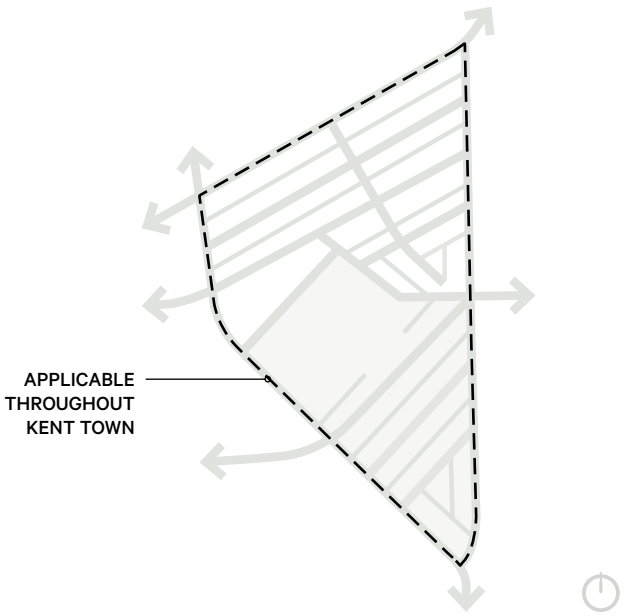


Example stone spoon drain

Example stone spoon drain

Concrete Edge

DESCRIPTION	Insitu Concrete Edge.
COLOUR	Portland Grey.
FINISH	Smooth steel trowel, pencil round edge.
DIMENSION	150mm wide, flush with adjacent pavement.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— Smooth trough finish. — Reinforced to suit in vehicle use areas.
MAINTENANCE	— General cleaning. — Repair by replacing damaged sections between cracking joints. — Monitor adjacent paved surfaces to eliminate trip hazards.
USES	— Edging between paved surfaces and garden beds along main roads and laneways.





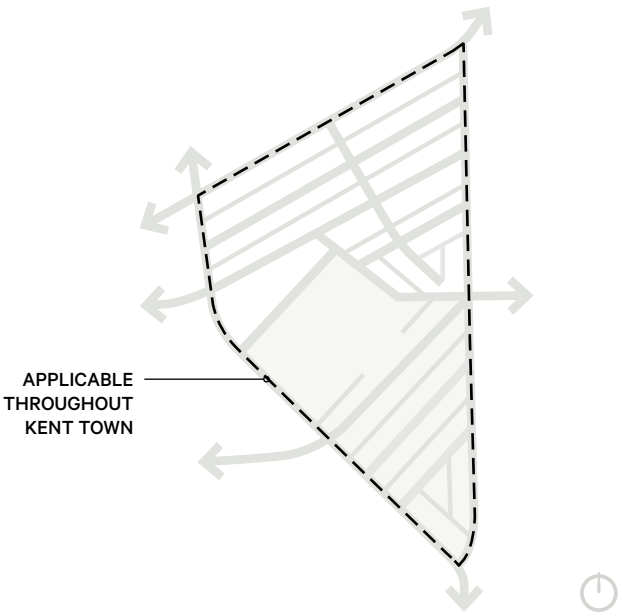
Example concrete edge

City of
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Payneham
& St Peters

E2

Steel Edge

DESCRIPTION	Flush steel edge.
MATERIAL & FINISH	6mm thick mild steel equal angle, folded at corners and fully seam welded at joints.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— Finish flush with adjacent pavement surface. — Seam welded. Welds ground flush.
MAINTENANCE	— If required, repair or replace damaged sections.
USES	— Garden beds edging along main roads and streets.





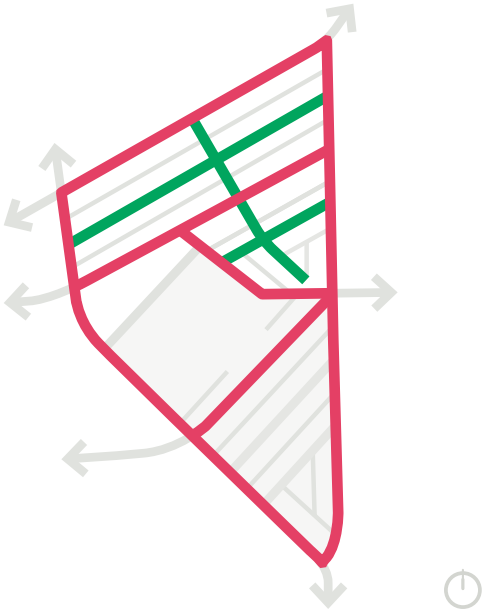
Example steel edge

City of
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& St Peters

E3

Concrete Kerb & Watertable

DESCRIPTION	Insitu concrete.
COLOUR	Portland Grey.
FINISH	Smooth steel trowel.
DIMENSION	— Kerb: 150mm wide x 150mm high. — Watertable: 350mm wide.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— To Council standards.
MAINTENANCE	— General cleaning.
USES	— Main roads. — Streets in Urban Character Precinct.





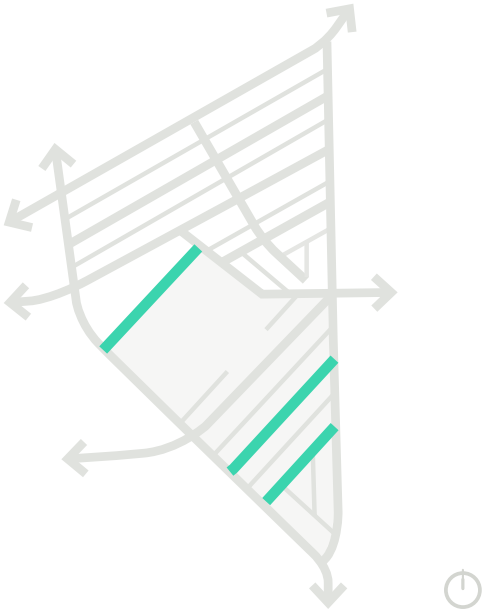
Example concrete kerb and watertable

Example concrete kerb and watertable

City of
Norwood
Payneham
& St Peters

E4

Stone Kerb & Watertable

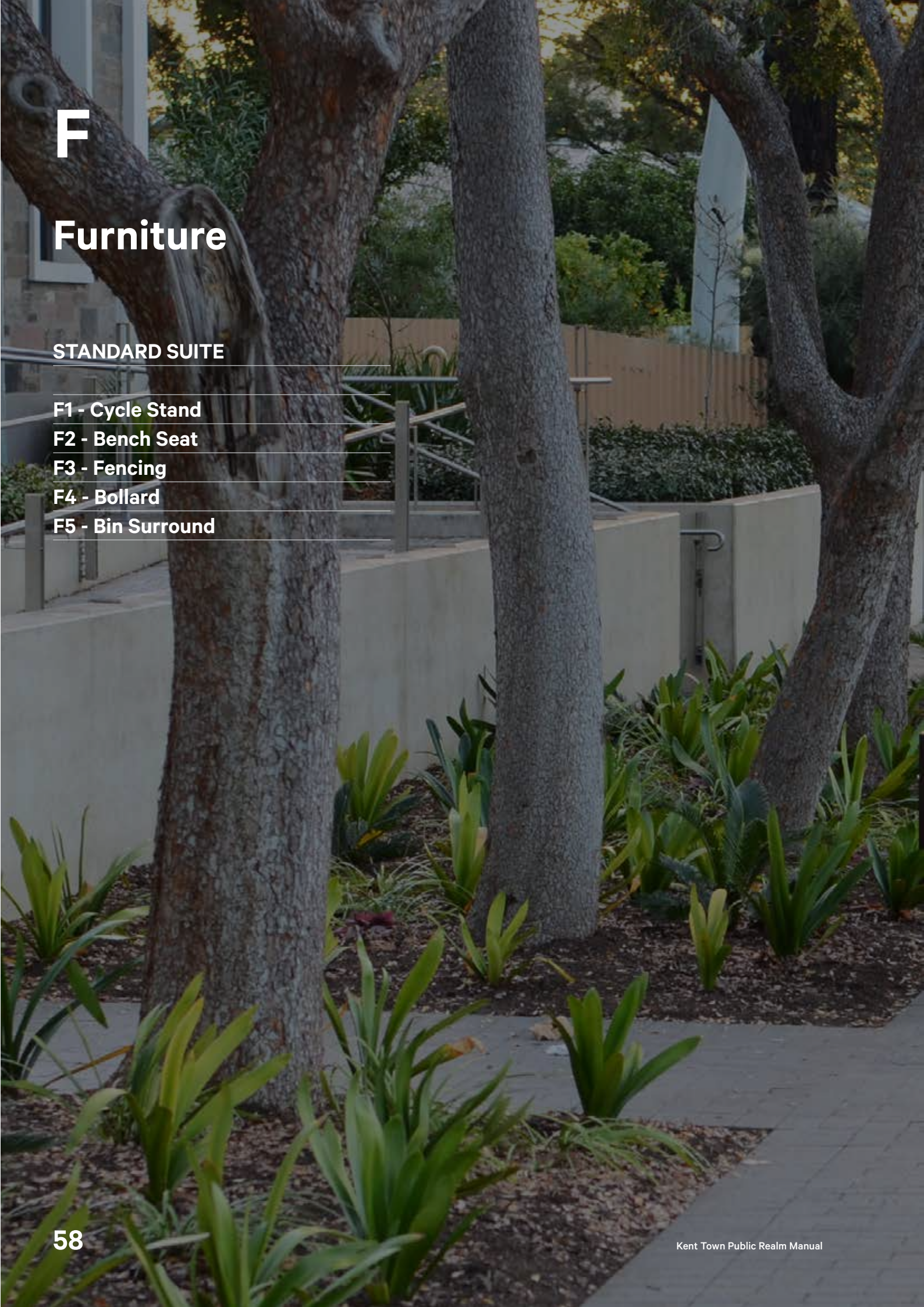


DESCRIPTION	Stone kerb and concrete watertable.
MATERIAL & FINISH	Stone - Bluestone. Concrete - Portland Grey.
DIMENSION	— Kerb: 150mm wide x 150mm high. — Watertable: 350mm wide.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— To Council standards.
MAINTENANCE	— If required, replace or repair damaged sections.
USES	— Streets in Historic Character Precinct.



Example stone kerb and concrete water table

Example stone kerb and concrete water table



F

Furniture

STANDARD SUITE

F1 - Cycle Stand
F2 - Bench Seat
F3 - Fencing
F4 - Bollard
F5 - Bin Surround



St Peters Street

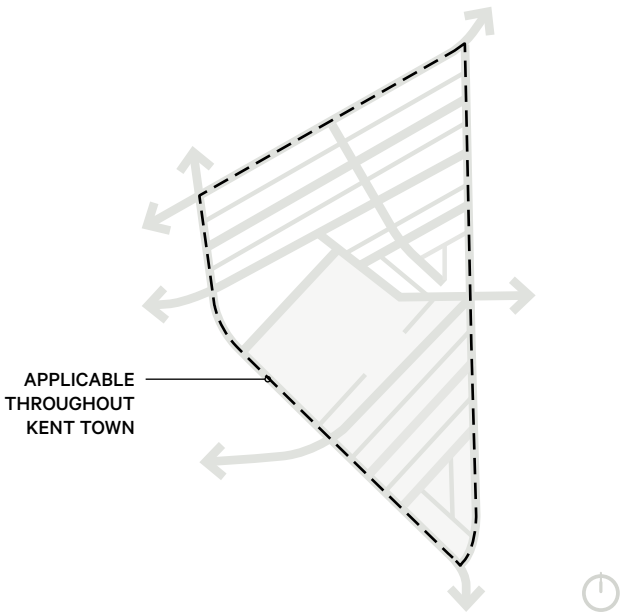
St Peters, SA

City of
Norwood
Payneham
& St Peters

F1

Cycle Stand

DESCRIPTION	'KT' cycle stand.
COLOUR	Natural Grey, Micaceous paint system.
MATERIAL & FINISH	Frame: Micaceous painted mild steel. Timber battens: Class 1 durability hardwood. Timber protective coating: Dulux "Intergrain – Dimension 4 – Waterbase".
DIMENSIONS	800mm height x 900mm width.
SUPPLIER	Iguana Creative - local supplier.
PERFORMANCE REQUIREMENTS	— Subsurface installation to manufacturer's specifications. — Provide concrete footings and fixings to manufacturer's recommendation.
MAINTENANCE	— Painted surfaces - touch up as required. — Timber - replacement of timbers when damaged. Re-application of protective coating as per manufacturers directions.
USES	— Primarily located along main roads and streets in the Urban Character Precinct.





'KT' cycle stand

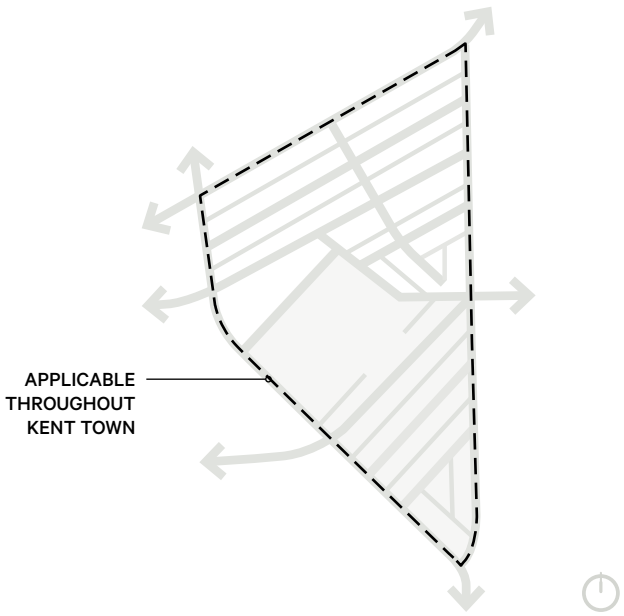
'KT' cycle stand

City of
Norwood
Payneham
& St Peters

F2

Bench Seat

MODEL	'KT' seat.
COLOUR	Natural Grey, Micaceous paint system.
MATERIAL & FINISH	Frame: Micaceous painted mild steel. Timber battens: Class 1 durability hardwood. Timber protective coating: Dulux "Intergrain – Dimension 4 – Waterbase".
DIMENSIONS	2400mm / 1800mm long.
SUPPLIER	Iguana Creative - local supplier.
PERFORMANCE REQUIREMENTS	— Subsurface installation to manufacturer's specifications. — Provide concrete footings and fixings to manufacturer's recommendation.
MAINTENANCE	— Painted surfaces - touch up as required. — Timber - replacement of timbers when damaged. Re-application of protective coating as per manufacturers directions.
USES	— Primarily located along main roads and streets in the Urban Character Precinct.





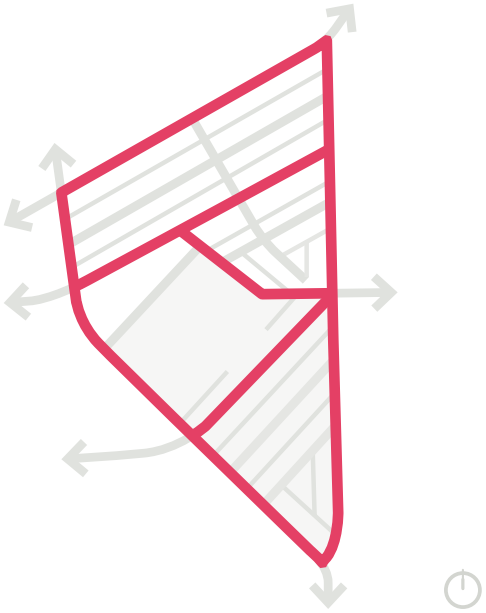
'KT' seat

'KT' seat

City of
Norwood
Payneham
& St Peters

F3

Fencing



DESCRIPTION	Fencing - Square hollow sections.
MATERIAL & FINISH	Painted Tubular Steel modules. 2 coat epoxy paint system - colour Dulux 'Natural Grey'.
DIMENSIONS	Varies - minimum 1000mm high.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— Recessed, countersunk stainless steel 316 grade tamper-proof fixings. — Gaps between balusters and installation to comply with relevant standards.
MAINTENANCE	— Minimal - painting/surface touch-up as required.
USES	— Barriers at intersections along main roads.



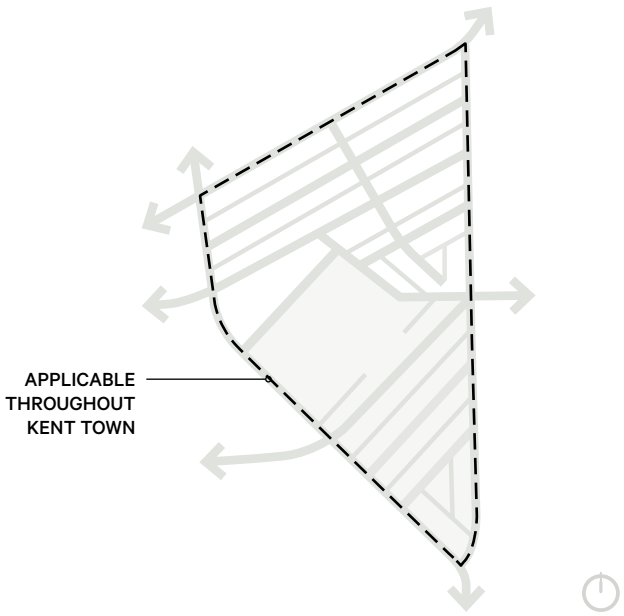
Example fencing

City of
Norwood
Payneham
& St Peters

F4

Bollard

DESCRIPTION	'KT' bollard.
MATERIAL & FINISH	10mm mild steel plate painted Natural Grey, Micaceous paint system.
DIMENSIONS	1000m high x 110mm.
SUPPLIER	Iguana Creative - local supplier.
PERFORMANCE REQUIREMENTS	— Concrete footing to suit location and application.
MAINTENANCE	— Replacement when damaged.
USES	— Primarily located along main roads and streets in the Urban Character Precinct.

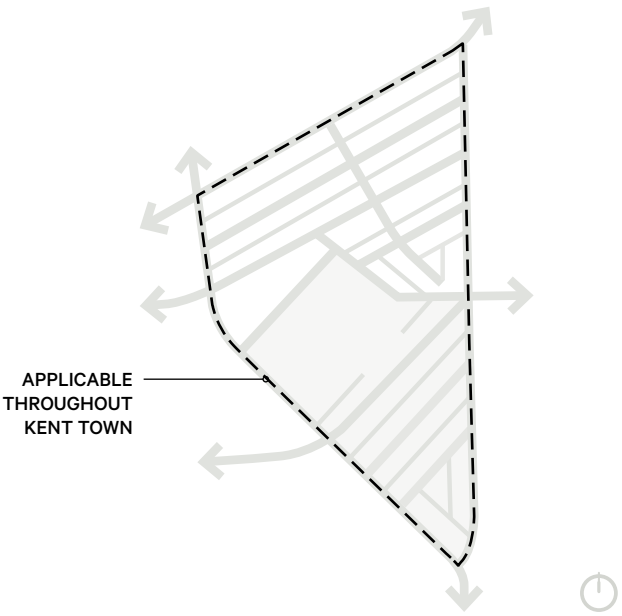




'KT' bollard

Bin Surrounds

DESCRIPTION	'Parade' bin surround
MATERIAL & FINISH	Panels: perforated (entire panel) powder coated zinc plated steel Splash tray and trim: brushed stainless steel (316 grade) Kent Town logo laser cut into central panel
COLOUR	Notre Dame
DIMENSIONS	715mm x 780mm x 1140mm
SUPPLIER	Spark
PERFORMANCE REQUIREMENTS	— Fitted with continuous hinge. Keyed access. — Concealed tamper proof vandal resistant fixings. — Direct fix install on concrete pad footing
MAINTENANCE	— Regular emptying of rubbish. — Removal of staining and general cleaning. — Able to withstand continual cleaning with high pressure water apparatus.
USES	— Primarily located along main roads and streets in the Urban Character Precinct.





Example bin



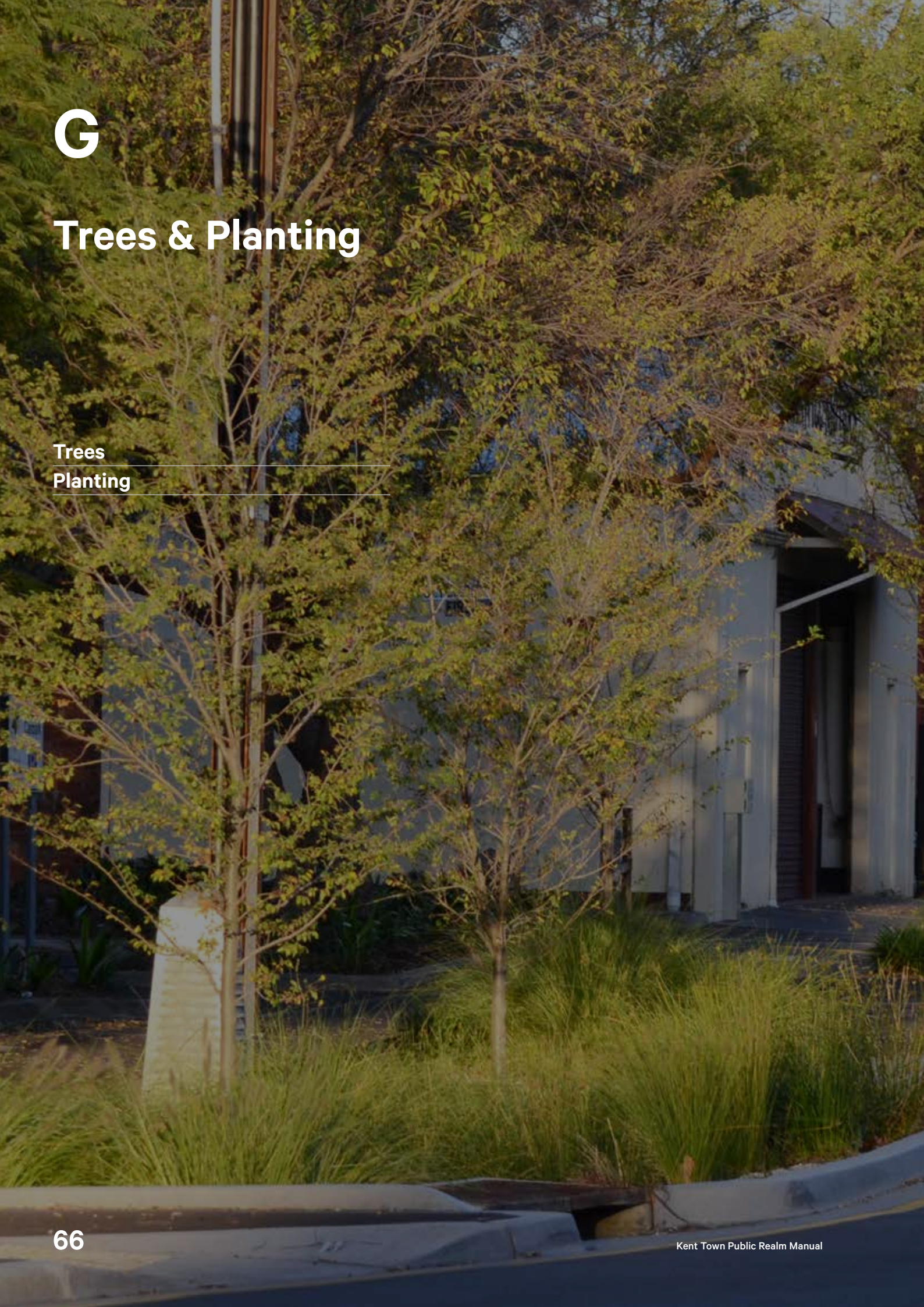
‘KT’ Bike Stand
Kent Town, SA

G

Trees & Planting

Trees

Planting





St Peters Street

St Peters, SA

Trees

— A variety of tree species are used to provide variety and amenity.
— Overhead wires are consolidated underground where possible to allow for large street trees.
— The scale of spaces is considered to accommodate tree species at maturity.
— Species are selected for their low maintenance requirements, non-invasive growth habits, life span and suitability to the local microclimate and soils.
— Good tree form and health is promoted through:
  — Suitable tree pit preparation.
  — Selecting quality advanced tree stock exhibiting good growth and form.
  — Suitable planting techniques.
  — Suitable placement to avoid vehicle damage.
  — Avoiding compaction around the base of the trees.
  — Incorporation of root control barriers.

TREE SELECTION TABLE

	Celtis laevigata	*Cupaniopsis anacardioides*	*Ginkgo biloba (sterile)*	*Gleditsia triacanthos 'Shademaster'*	*Pistachia chinensis*	*Platanus x acerifolia 'London Plane*	*Quercus cerris*	*Ulmus parvifolia 'Todd'*	*Zelkova serrata 'Green Vase'*
MAIN ROADS	○					○	○		○
STREETS	○	○	○	○	○			○	○
LANEWAYS			○	○				○	



Celtis laevigata



Gleditsia triacanthos 'Shademaster'



Pistachia chinensis



Platanus x acerifolia 'London Plane



Quercus cerris



Zelkova serrata 'Green Vase'

Planting

- Selection of plant species takes into account:
  - Character and identity.
  - Plant structure and character.
  - Seasonal change.
  - Shade and wind protection.
  - Stormwater management.
  - Maintenance.
- Planting zones are bold and simple in their layout and organisation, avoiding overly fussy or busy planting designs.
- Species are selected appropriate to local site conditions, including horticultural form, ongoing maintenance and watering requirements.
- Vertical greening is incorporated where appropriate.
- Plants generally installed at 3 plants per sqm.

PLANT SELECTION TABLE

MEDIUM SHRUBS
Philliodendron xanadu
Santolina chamaecyparissus
SMALL SHRUBS
Anigozanthos flavidus
Banksia blechnifolia
Convolvulus cneorum
Correa reflexa
Dianella cultivars
Eremophila cultivars
Ficus pumila
Grevillea 'Robyn Gordon'
Juniperus conferta
Liriope 'Just Right'
Monstera deliciosa
Raphiolepis indica 'Snow Pearl'
Rosmarinus officinalis 'Prostratus'
Russellia equisetiformis
Strelitzia reginea
Teucrium fruiticans
Westringia Mundi
GROUNDCOVERS
Myoporum parvifolium
Scaevola albida
Trachelospernum jasminoides 'Flatt Matt'









Example planting style and vertical greening

S

Signage



Street Name Signs

Interpretive Signs

Street Name Signs & Interpretive Signs

Signage is used to direct users within the public realm and to recognise and interpret the rich cultural heritage of Kent Town.

Signage is strategically located and designed, and is coordinated with other public realm elements to contribute to the character of Kent Town.

A unique brand and signage suite is proposed for Kent Town that will create a recognisable and unique identity that reinforces character and sense of place.



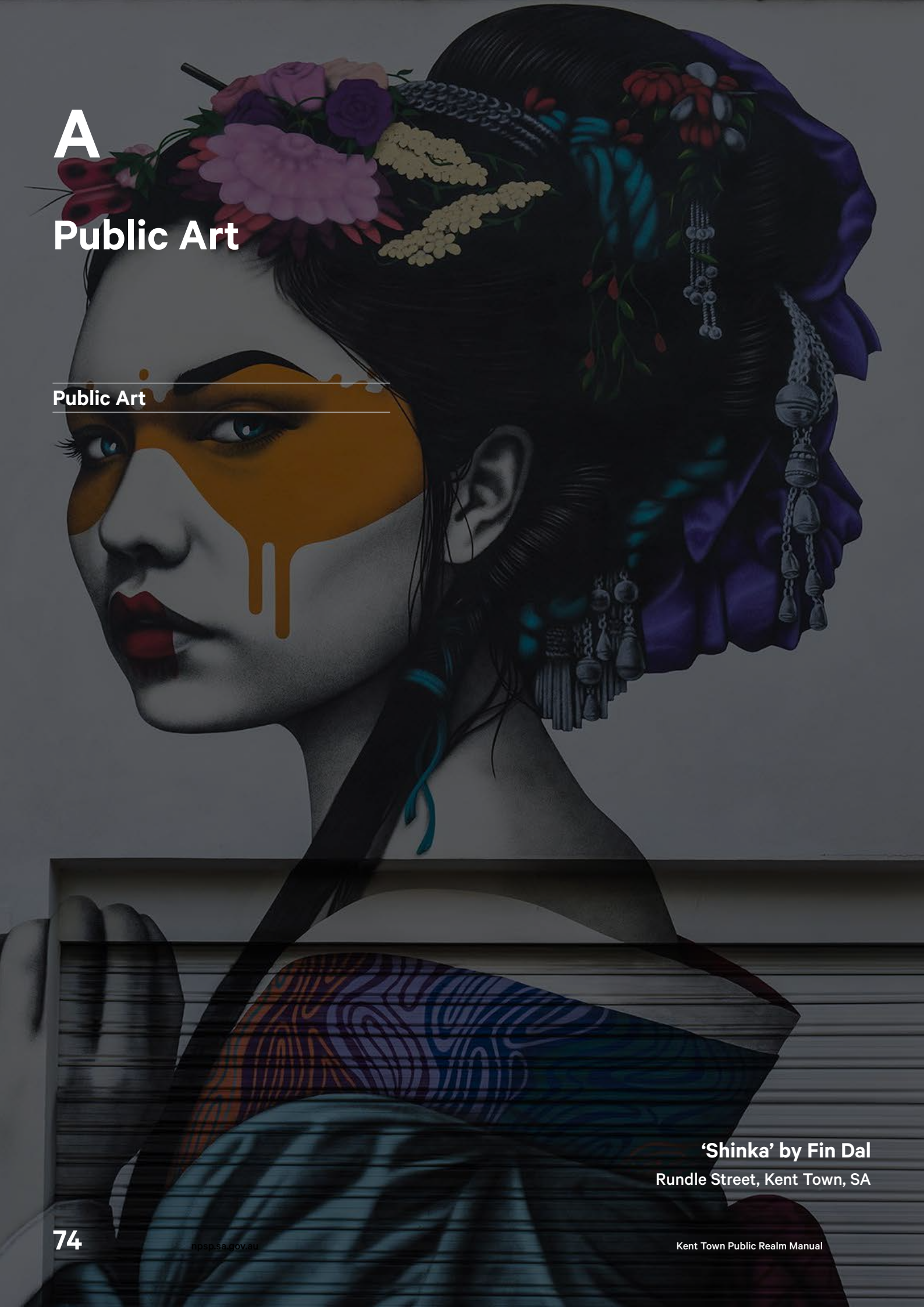
Example street name signage



Example interpretive signage

A
Public Art

Public Art



‘Shinka’ by Fin Dal
Rundle Street, Kent Town, SA

Public Art

Public art helps communicate a socially and culturally rich environment. It provides identity and creates a unique and meaningful sense of place.

Public art is strategically planned and curated within the public realm, supporting the overall design of a consistent, distinctive and attractive environment.

Artwork is encouraged to be integrated within new development on private property and applied to existing buildings at street level.

Opportunities for integrating public art within Kent Town include:

— Coordinating a consistent approach and style to public art.
— Expressing the story of Kent Town, its community and culture.
— Activating places by providing an original, innovative and stimulating environment.
— Linking and highlighting places of interest.
— Fostering sense of place, social interaction and community ownership.
— Integrating public art with other public realm elements, including furniture, paving, lighting, fencing, facades, structures and wayfinding.





Example public art



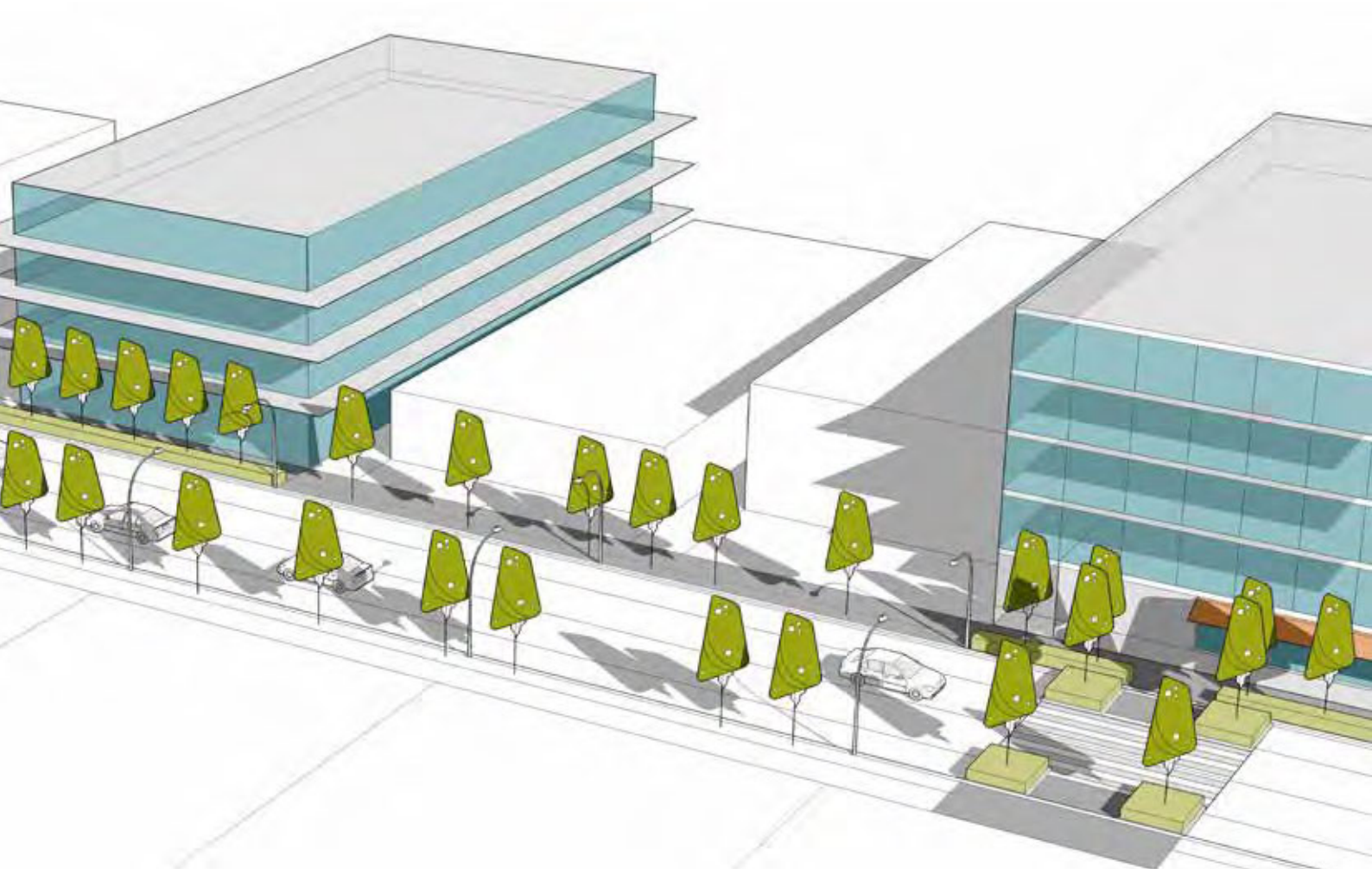
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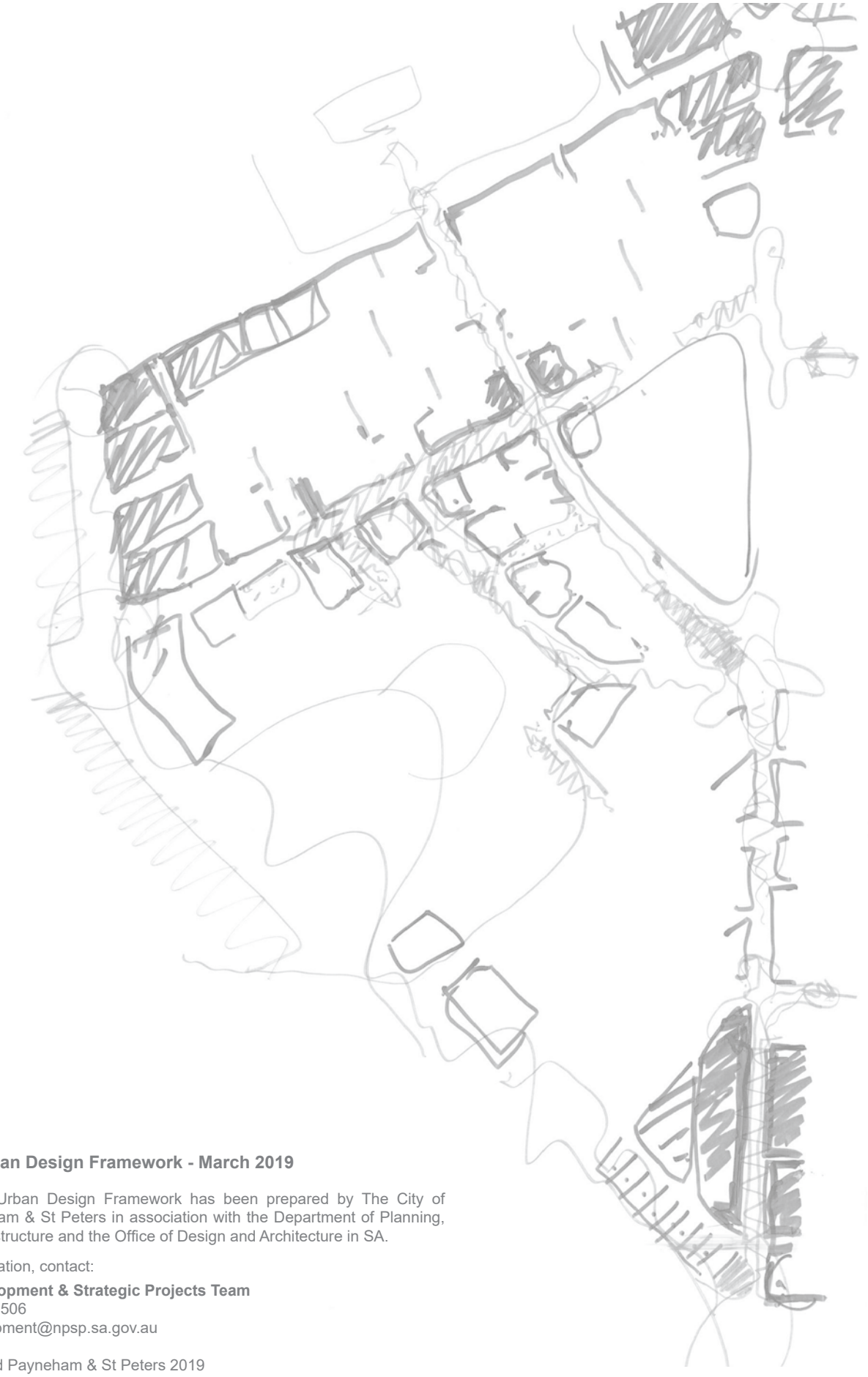
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Kent Town

Urban Design Framework



City of
Norwood
Payneham
& St Peters



Kent Town Urban Design Framework - March 2019

The Kent Town Urban Design Framework has been prepared by The City of Norwood Payneham & St Peters in association with the Department of Planning, Transport & Infrastructure and the Office of Design and Architecture in SA.

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Kent Town

Urban Design Framework

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1.0 Introduction

In 2010, the South Australian Government released *The 30 Year Plan for Greater Adelaide*, built around the objectives of improving livability, increasing competitiveness and driving sustainability.

As part of the State Government's long term vision, the suburb of Kent Town was identified as a 'significant high density, mixed use regeneration opportunity'. In response, local planning policy changes were made in 2013 to introduce opportunities for higher density apartments, retail, office and commercial developments, amongst the historic streets and buildings of Kent Town.

The suburb's proximity to Adelaide's CBD, East End and the Adelaide Park Lands to the west, and access to the popular retail and dining precincts of Magill Road and The Parade to the east, make the neighbourhood a highly desirable location for future growth. Development will provide new opportunities for people to live, work and visit the City of Norwood Payneham & St Peters.

The next few years will be an important next stage in the evolution of Kent Town. Redevelopment proposals must contribute to a liveable neighbourhood and benefit the local community.

The City of Norwood Payneham & St Peters, in partnership with the Department of Planning, Transport and Infrastructure (DPTI), and the Office of Design and Architecture South Australia (ODASA), has realised the need for a framework that supports new development to improve the safety, accessibility and amenity of local streets and public spaces across Kent Town to achieve a better quality of life for residents, workers and visitors.

Role of the Development Plan

The Norwood, Payneham and St Peters (City) Development Plan establishes the objectives, desired character and principles of development control within Kent Town. In 2013, parts of Kent Town were rezoned as 'Urban Corridor Zone'. The Urban Corridor Zone includes three Policy Areas: Boulevard, Business and Corridor, which are briefly described below.

- **Urban Corridor (Boulevard)** - medium and high rise development framing the street (mainly along North Terrace and Dequetteville Terrace) with shops, offices, commercial and residential uses;
- **Urban Corridor (Business)** - mixed use business area for a range of commercial and light industrial land uses with medium and high density residential development; and
- **Urban Corridor (High Street)** - mixed use area for retail, office, commercial, civic and medium and high density residential development with active streets to support the economic vitality of Kent Town.

As a result of the rezoning, Kent Town now has the capacity to accommodate a likely yield of 550 new dwellings (primarily apartments) and an overall capacity for approximately 10,000 square metres of retail floor space and 30,000 square metres of office and commercial floor space.

Purpose of the Urban Design Framework

The Urban Design Framework sets out a long term vision for Kent Town that highlights the importance of stronger relationships between development sites and local streets. It raises aspirations for developers, designers, businesses and the local community for public and private spaces that add to the future liveability of Kent Town.

The document is intended to provide value to the following key stakeholders who will be involved in the long term evolution of the neighbourhood.

Developers / Designers

The Urban Design Framework supports an aspirational vision for Kent Town, to encourage local developers and designers to find ways to positively integrate the planning and design of new developments with the aspirations and settings of the surrounding streetscape.

Decision Makers

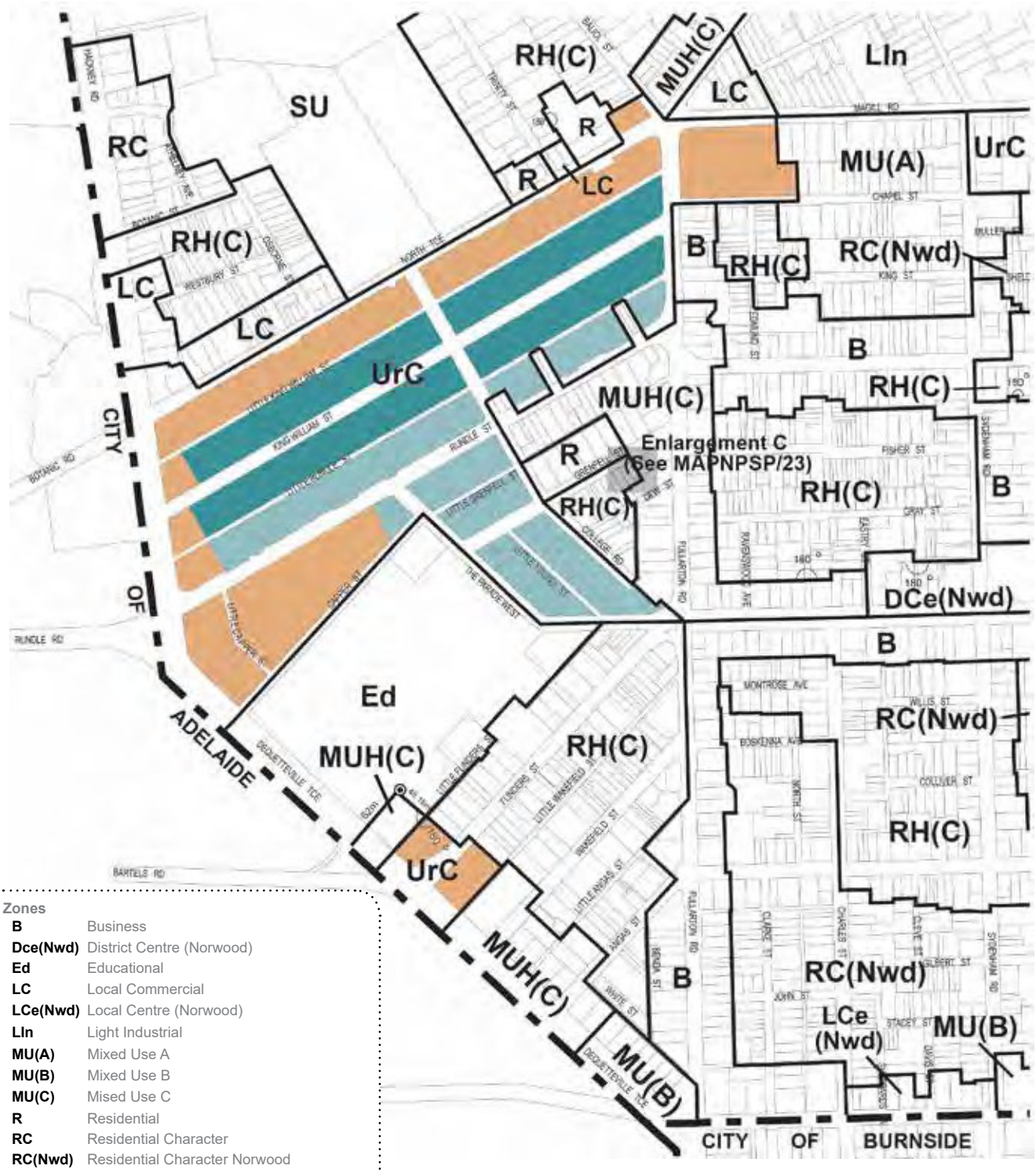
The vision, themes and overall strategic directions for Kent Town provides a aspirational framework for decision makers to make a more informed judgment on the merits of new development and its positive contribution to the long term evolution of Kent Town.

Businesses / Residents / Property Owners

The Urban Design Framework provides a vision for a quality of life anticipated within Kent Town through its long term impact of development, to benefit the existing businesses, residents and property owners as well as attract others to move into the neighbourhood.

Asset Managers

The strategic directions for Kent Town and the Public Realm Manual provide a long term commitment to enhance the quality of the public realm. Renewal of assets within Kent Town should be undertaken per the guidance and standards set out by the Urban Design Framework and Public Realm Manual.



Map of Development Plan Zones in Kent Town (and Adjoining Suburbs) with the 3 Urban Corridor Policy Areas Shown in Colour

Zones

B	Business
Dce(Nwd)	District Centre (Norwood)
Ed	Educational
LC	Local Commercial
LCe(Nwd)	Local Centre (Norwood)
LIn	Light Industrial
MU(A)	Mixed Use A
MU(B)	Mixed Use B
MU(C)	Mised Use C
R	Residential
RC	Residential Character
RC(Nwd)	Residential Character Norwood
RH(C)	Residential Historic
SU	Special Uses
UrC	Urban Corridor

Policy Areas

- Urban Corridor (Boulevard)
- Urban Corridor (Business)
- Urban Corridor (High Street)

Kent Town Design Hub Workshop

The Urban Design Framework commenced through a Design Hub Workshop held with stakeholders from the State Government Department of Planning, Transport and Infrastructure (DPTI) and the Office for Design and Architecture SA (ODASA) in November 2016.

The purpose of the Kent Town Design Hub was to align the understanding and expectations of both the State Government and the City of Norwood Payneham & St Peters in order to develop a shared vision and a common direction for the future evolution of Kent Town.

The Design Hub Workshop confirmed the need for greater collaboration and coordination of the different inputs from all stakeholders to establish lasting change within Kent Town. The outcomes of the Design Hub can be summarised into four areas as follows.

- A vision for Kent Town to be a working, unique, connected and evolving neighbourhood.
- Neighbourhood themes that highlight the importance of Place, Linkages, Creative Industries and Resilience.
- A proposal to develop an Urban Design Framework that will enable local initiatives and change in the evolution of Kent Town through leadership, advocacy, influence and partnering.
- Identification of next steps, highlighting the importance of demonstration projects, supporting policy and strategy, and building stronger partnerships between government and the community.

The Urban Design Framework reflects the aspirations of the the Council, DPTI and ODASA for the future of the Kent Town neighbourhood by:

- Highlighting key themes and directions that reveal the new possibilities to capture the urban character and qualities desired for Kent Town;
- Promoting greater integration between the design and planning of individual development sites with high expectations for local streets to achieve a more vibrant public realm;
- Encouraging the realisation of localised opportunities, which are co-ordinated and contribute towards the longer term evolution of Kent Town; and
- Seeking the participation of government, developers, businesses, residents and the wider community in shaping the evolution and enhancement of Kent Town.



Design Hub Workshop, November 2016

A Co-ordinated Future

The Urban Design Framework is the Council's strategic document that sets out the overarching vision, themes, directions and implementation strategy for Kent Town's public realm. It is informed by and responds to the Urban Corridor Zone and three Policy Areas as set out and described in the Norwood Payneham & St Peters (City) Development Plan.

The Urban Design Framework is supplemented and supported by related documents that expand on the specific opportunities identified, providing additional information to assist future development to make a positive contribution to the quality of the Kent Town neighbourhood.

The following summarises the supporting documents provided to assist Elected Members, developers, businesses, residents, and the local community to understand how future development can be better integrated and encouraged to build on the character and opportunities that exist within Kent Town.

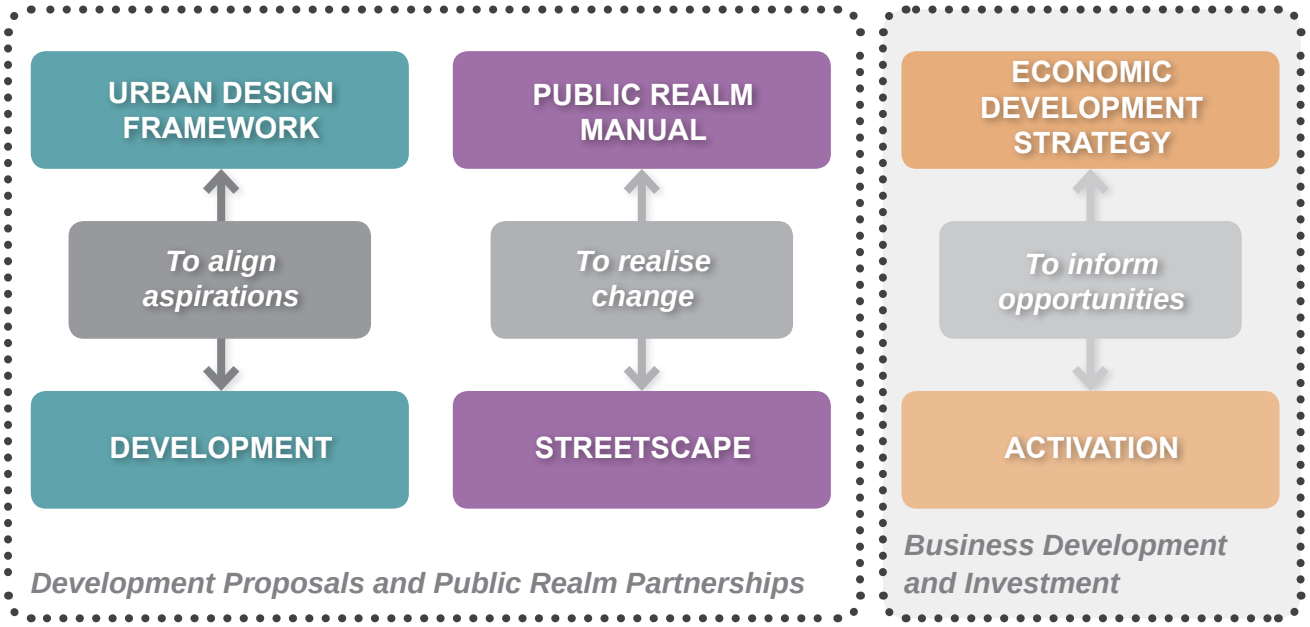
Kent Town Public Realm Manual

The Public Realm Manual reflects the vision, ideas and themes of the Urban Design Framework, through detailed recommendations of the future function and layout of each street within Kent Town. It specifies a comprehensive palette of materials, furniture and other urban elements to be used throughout Kent Town to create a higher quality and more resilient public realm. The role of the Public Realm Manual is to guide the long-term management and replacement of all Council-owned infrastructure to a new standard, as well as guide the opportunity for new public realm enhancements.

Economic Development Strategy

An Economic Development Strategy (still to be developed) will be used as a tool to identify and attract new businesses and enhance existing businesses to support the economic competitiveness, community activation and unique, cultural appeal of Kent Town.

The Kent Town Urban Design Framework & Related Documents



2.0 A Vision for Kent Town

Understanding Kent Town

Kent Town is not a blank page or a precinct that can be prescriptively planned and reconstructed. Rather, it is an existing and valued neighbourhood that will require new development to integrate with its local setting and make a positive contribution to drive its overall evolution.

The future for Kent Town will emerge from an appreciation and understanding of its unique history and character. The Urban Design Framework for Kent Town is built through a genuine understanding of the following five key qualities: History, Identity, Place, Streets and Landscape.

History

- The history, identity and character of Kent Town is not well understood or appreciated by many in the local community, developers or decision makers.
- Many people relate to a diversity of individual qualities, without a common or shared understanding of the neighbourhood.
- The legacy of social and political agitation, experimentation and innovation as well as Kent Town's distinct urban form provides a platform to empower the future vision.
- The sentiment of ‘neighbourhood’ reflects the history of the local area, its establishment and early development by Dr Kent, as well as the presence of Prince Alfred College and the Wesley Uniting (formerly Methodist) Church within Kent Town.

Identity

- The act of ‘making’ is common amongst the diversity of existing businesses. It contributes to the contemporary identity, appeal and day to day activation of the local streets.
- The organic, imperfect and incomplete nature of the neighbourhood is part of its identity and appeal. Future development should contribute to the evolution, avoiding the generic, homogeneous or ‘slick’.
- The current 'life' of the working neighbourhood (mixed use) and the laneway public art trail are the most vulnerable due to future development pressures.
- Amongst the dominance of light industry, Kent Town is understood to be a focus of small, independent, creative businesses. However, for many of these businesses, their work methods, production or products are not visible within the neighbourhood.

Place

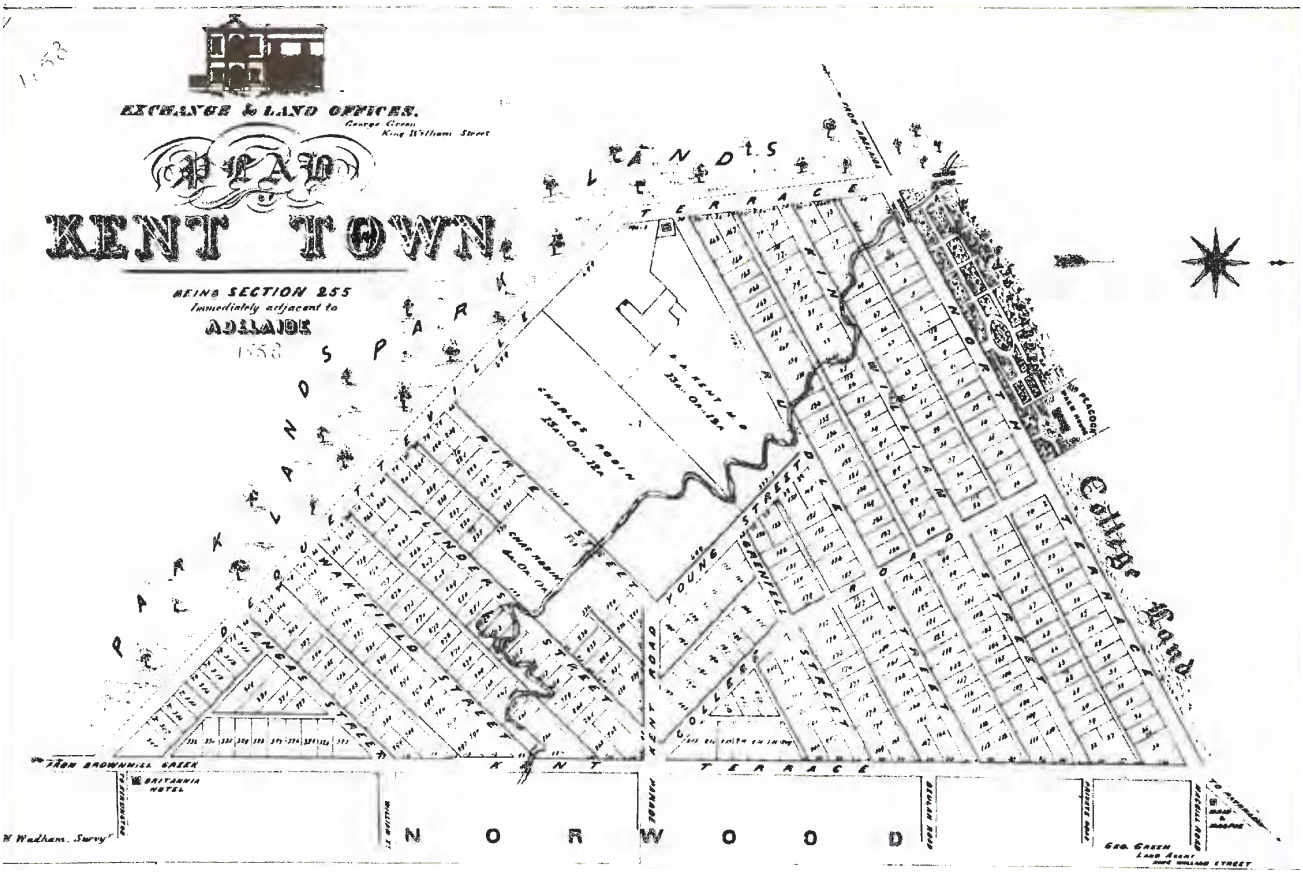
- There is a lack of established community focused places and spaces to gather within the neighbourhood.
- The *Little Rundle Arts Project* engaged the local community and fostered a new sense of place for the laneway.
- The organic and ad-hoc evolution of the ‘little’ streets have established a varying urban form that encourages exploration of these streets to reveal small unique places of interest / activity, unlike the traditional planned street frontages.
- The ambition and appeal of new developments should not be limited to its reliance on views to the Adelaide Park Lands or CBD connections. It should value the local neighbourhood and contribute new services and activation that adds to the day-to-day life.

Streets

- Kent Town is heavily influenced by daily commuter traffic into and out of the CBD, with several bus routes.
- Kent Town's unique position between the Adelaide CBD, the Park Lands, as well as the Magill Road and The Parade Precincts, makes it easily accessed and ideally suited to growth in walking and cycling.
- Kent Town must ensure it does not remain isolated from its wider context or perceived as an ‘island’ trapped by a major road network.
- Pedestrian and cyclist safety, accessibility and amenity have not been historically prioritised in the management of the local streets, resulting in outdated infrastructure and an overall low amenity.
- The historical street network of Kent Town reflected a diversity of built form, e.g. grand homes along Dequetteville Terrace and workers terraces along the ‘Little’ Streets (i.e. laneways). The relationship of the built form to the scale of the street should also be reflected in new built form and public realm.
- The ‘Little’ streets (i.e. the laneways, most of which have names beginning with Little) provide a human scale to the neighbourhood. However, increased building heights adjacent the laneways and the consolidation of smaller irregular blocks will change the proportion and challenge the valued qualities of place in the future. A greater understanding of the desired character for the ‘Little’ Streets is necessary in the planning and design of building interface to allow for disruption, activation and greater permeability.

Landscape

- The existing landscape (planned and opportunistic) is valued within Kent Town, in part due to the scarcity of green open space across the neighbourhood.
- Redevelopment of the neighbourhood should include opportunities to reveal or interpret the invisible landscapes, including the historic First Creek alignment, Kaurna connection to the area and the former landscape (environment).
- Landscape and public art are the most obvious demonstrations of the community's attachment to place, in particular through the level of care and innovation in the establishment and ongoing maintenance of these elements.
- Sustainability and the importance of greening are considered basic building blocks of the next evolution of Kent Town; a particular point of difference to its history.



Map of Early Kent Town

2.1 Neighbourhood Vision

Kent Town is a connected neighbourhood that offers a unique lifestyle and diverse built form. The public realm respects Kent Town's past and responds to the community's current uses and anticipated future needs.

From a combined understanding of its past, a new holistic vision for the neighbourhood can align all stakeholders in a shared future for Kent Town.

A connected neighbourhood...

Kent Town should be a focus for businesses, residents and students seeking the professional, lifestyle and wellbeing benefits of being located between the City, the Park Lands and the Eastern suburbs.

The streets within Kent Town should be the setting for public life, allowing people to spend time within the neighbourhood as well as find ease of movement and different ways of travelling into and out of Kent Town.

A unique lifestyle appeal...

Kent Town should provide greater opportunities for its workers, residents, students and visitors to contribute to the life and appeal of the neighbourhood, seven (7) days a week.

It should enable existing businesses to continue to succeed as changing economic, lifestyle or cultural opportunities emerge in new developments across Kent Town.

An attitude that gives respect to its past...

Kent Town is a working neighbourhood that has been continually evolving since its settlement in 1856. Its progressive, opportunistic and innovative history is a unique inheritance. New development respects the past and contributes to the existing diversity of built form and mix of uses.

Responsive to Future Needs...

The evolution for Kent Town should be supported by contemporary technologies and infrastructure to ensure it remains relevant and responsive to the changing needs of residents and workers. Greener streets and buildings will create a liveable neighbourhood that is more resilient to climate change.

A CONNECTED NEIGHBOUR-HOOD

The streets should provide the setting for public life within Kent Town, and better connect the community with the surrounding Park Lands, CBD and eastern precincts

A UNIQUE LIFESTYLE APPEAL

New opportunities for its growing worker and resident community to contribute to the life and appeal of the neighbourhood, seven days a week

RESPECT FOR THE PAST

A progressive, opportunistic and innovative history is a unique inheritance that challenges the attitude and ambition of the next transformation

RESPONSIVE TO THE FUTURE

Modern technology and green infrastructure is responsive to changing needs of the community and provides resiliency to climate change

2.2 Neighbourhood Ideas

With a lack of parks and squares, the streets within Kent Town provide the greatest opportunity to sustain public life.

The evolution of Kent Town will be shaped by incremental changes to the public realm and driven by local developments.

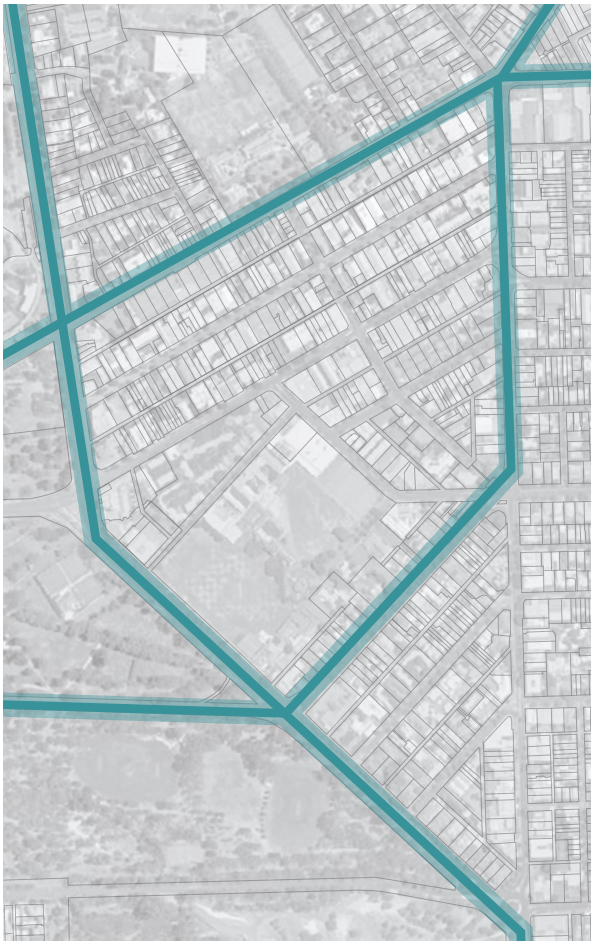
A greater clarity of the individual identity, roles and long term aspirations for key streets will better inform and engage development proposals across the neighbourhood and promote more positive change towards the anticipated evolution of Kent Town.

Several ideas are discussed which can contribute towards achieving the neighbourhood vision. These include:

- The 'Borrowed Landscape'
- Suburban Connectors
- Community Connections
- The 'Green Stitch'
- The 'Finer Grain'.

In addition to these ideas, the Council, local community and other stakeholders are encouraged to work together to identify potential future opportunities to utilise vacant land and/or purchase an appropriate site for public open space within Kent Town.





The 'Borrowed Landscape'

The Dequetteville Terrace streetscape, which includes the Prince Alfred College oval and other heritage properties with large and established landscaped frontages, will promote a 'Green Boulevard' that celebrates the character of the adjacent Adelaide Park Lands. The streetscape should encourage greater pedestrian movement along the street, minimising side street and laneway disruption, as well as emphasising safe connections into the Park Lands and the Park Lands trails.

Suburban Connectors

North Terrace and Fullarton Road (north) will become increasingly more congested carrying daily commuter traffic into and out of the Adelaide CBD. The streetscapes along these two important regional connectors will be highly visible and present the outside edge of Kent Town.

The traffic and infrastructure requirements of the streets will need to be managed in co-ordination with the enhancement of the streetscapes, including increased formal tree planting, street lighting and other urban elements reflective of higher profile urban boulevards.





Community Connections

College Road will be re-imagined as a safer, greener and more engaging place for the community to gather within Kent Town. College Road will provide an important strategic connection across Kent Town as well as encourage new developments to expand commercial opportunities for activation along the street.

The 'Green Stitch'

A new streetscape for Fullarton Road (south) can better stitch together, or connect, the existing communities of Kent Town and West Norwood / Kensington, and lead people towards a revived College Road (Community Connection role).

Rejuvenation of the existing street trees, footpaths and kerbing can create a more comfortable, accessible street that is activated with new mixed use development addressing the street edge.



The 'Finer Grain'

The unique ‘Little’ streets (or laneways) across Kent Town can contribute to interesting, human scale interventions. New paving, lighting and greening will complement an increase in active building frontages to the laneways.

The network of the finer grain streets can be further expanded with new pedestrian laneways or access points that are incorporated within new private development sites.

Improved pedestrian access and activation of the laneways will provide for greater connections across Kent Town (between North Terrace, Rundle Street and The Parade West), as well as offer a new 'quality' of urban life that is both convenient and interesting.

3.0 Neighbourhood Themes

The Urban Design Framework aims to promote a long term vision that is shared between State and Local Government, developers, local businesses and local residents. The Neighbourhood Plan was developed to demonstrate key initiatives under the control of the Council towards a more integrated and appealing neighbourhood.

The vision for Kent Town is supported by four distinct neighbourhood themes. Each theme addresses key strategic directions that contribute to the long term vision for Kent Town through the unique opportunities that exist within the neighbourhood.

The four themes are:

A Neighbourhood of Places

To create a contemporary neighbourhood that supports an inclusive, vibrant and sustainable way of life, emerging from Kent Town's residential, commercial, educational and industrial uses.

A Connected Neighbourhood

To create a welcoming neighbourhood that encourages people to safely move, explore and connect across Kent Town.

A Creative and Vibrant Neighbourhood

To promote the emergence of the Creative Industries across Kent Town, championing collaboration and innovation to build prosperity and contribute to the emerging sense of place.

A Resilient Neighbourhood

To create a resilient neighbourhood that integrates natural systems and increases sustainability initiatives in anticipation of a changing urban form.

These four themes provide common directions that can be applied to the local streets, existing buildings and new developments to better inform and support the evolution of Kent Town.



King William Streetscape, Verde Apartments, Kent Town, August 2018

3.1 A Neighbourhood of Places

To create a contemporary neighbourhood that supports an inclusive, vibrant and sustainable way of life, emerging from Kent Town's residential, commercial, educational and industrial uses.

Objectives

- Establish a distinctive public realm that supports increased safety, greening and accessibility, provides new opportunities for activation by existing and new businesses and reinforces the roles of particular streets across the neighbourhood.
- Establish a coordinated network of streets across Kent Town to distinguish the different roles, responsibilities and form of individual streets, in support of a wider vision for the neighbourhood.
- Establish new public spaces of varying scales across the neighbourhood that support an emerging way of life and build a greater sense of community amongst the existing businesses and residents.
- Support the opportunistic and organic evolution of Kent Town, its identity and appeal through more place focused interventions.
- Encourage greater integration between the streetscape and the built form, both existing and new, through ground floor and first floor activation.

Neighbourhood Development

Kent Town does not have a designated or planned 'heart' within the neighbourhood. The evolution of the neighbourhood will be flexible and opportunistic, building stronger relationships with new developments to create new public spaces within Kent Town.

The integration of new development with the local streets will significantly shape the scale, amenity and activation of the neighbourhood. The vision for Kent Town is based on well defined, connected streets with strong, active edges that create the settings for public life.

The Urban Design Framework is focused on advocating the potential for change through new development, rather than prescribing specific locations for public life. It seeks to engage with developers to achieve more integrated site planning and architectural forms.

Development sites should consider opportunities to expand public access and amenity to improve the activation of local sites, in particular, at street corners, laneways and urban plazas. These aims should not be considered as communal / private spaces, but rather public spaces for all to access and enjoy.

Corner Site Activation

- Opportunity exists to reclaim key intersections as the most visible setting for community life within Kent Town, including better setting for existing businesses or new developments;
- Site planning should respond to the increased accessibility and reclaimed footprint of the corner sites;
- Consider the location of building entries, shop front window displays, ground floor uses, canopies/verandahs and first floor balconies to encourage the greater activation of street corners;
- Reclaimed street corners can include new communal settings with expanded footpaths, tree planting, greening, outdoor dining, display of goods, street furniture and pedestrian crossing points; and
- As parking is not allowed within 10m of an intersection, reclaiming corners can be achieved without loss of on-street parking.

Laneway Activation

- Re-imagine service-orientated spaces to more intimate urban settings within the neighbourhood, acting as a front door to the increasing number of new developments facing onto the Little Streets, whilst maintaining service access;
- New public pedestrian linkages are encouraged within larger development sites to improve accessibility to ground floor businesses and services, as well as greater neighbourhood circulation;
- Laneway creation through side boundary offset can create greater active frontages to the ground floor, as well as opportunities for greater upper floor windows and balconies; and
- Pedestrian linkages can be integrated with vehicle servicing requirements of the site, providing it creates an inviting pedestrian environment.

Forecourt Activation

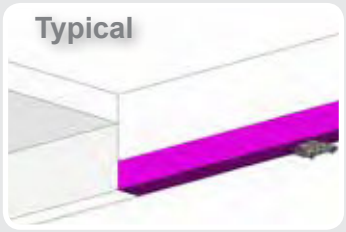
- New developments should consider how the proposed built form can create positive public forecourt settings for the community to gather, as well as improve the amenity of the neighbourhood;
- Forecourt settings or the spaces between buildings should be developed as an extension of the public realm meeting the new developments; and
- Internal, green and 'communal' open spaces can create new settings to gather for the wider community (preferred) or exclusively for private residents.

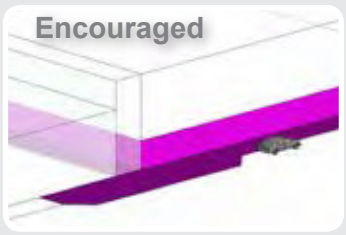






Corner Site Activation



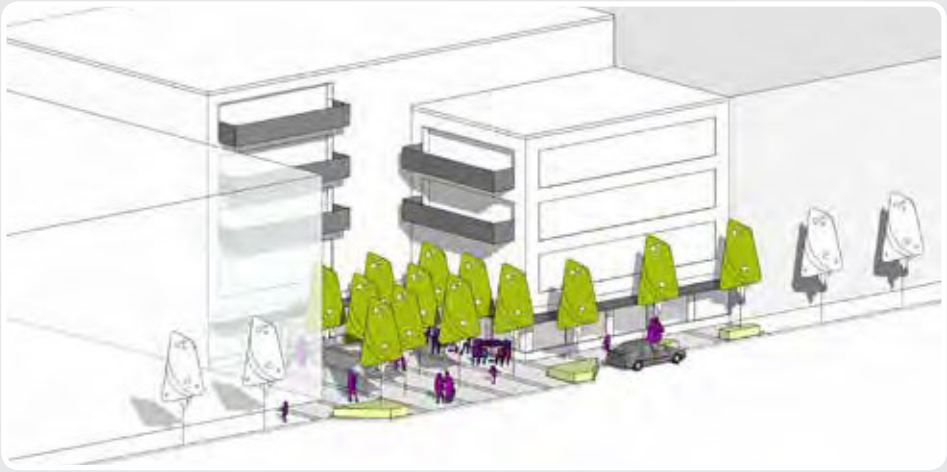




Laneway Activation







Forecourt Activation

3.2 A Connected Neighbourhood

To create a welcoming neighbourhood that encourages people to explore, as well as connect across Kent Town.

Objectives

- Provide settings that encourage people of all ages and abilities to safely and efficiently move across and through Kent Town.
- Value the complementary roles and appeal of different modes of transport to move into and through Kent Town, including future transport ambitions.
- Establish new links across Kent Town of varying scale in existing and new developments that support an emerging urban way of life and strengthen connection amongst the existing businesses and new residents.
- Promote the finer grain appeal of Kent Town through greater activation and new linkages at the interface between the streets and existing or new built form (ground floor and upper floor activation).

The streets across Kent Town fulfill different strategic roles to service the local and wider metropolitan road network. The planning, design and management of streets across Kent Town are also split between the Council and DPTI.

To achieve a better shared understanding of the future vision for Kent Town between the Council and the State Government, the *Streets for People Compendium* and the *Link & Place* assessment provide a common understanding of the existing and future roles of each local street in contribution to the different needs of the neighbourhood.

The Bones of the Neighbourhood

In support of these strategic 'link' roles, the 'place' aspirations can be better understood, including:

- *Framing Kent Town* – Development will provide increased scale and density, influencing traffic movement on local streets and providing the base for commercial, retail and entertainment activities at street level.
- *Connecting Kent Town* – Development will increase pedestrian and cyclist activity in the neighbourhood streets. The public realm supports this activity by providing safe, comfortable, attractive street environments.
- *Exploring Kent Town* – Development will introduce new opportunities to re-organise and connect under-valued spaces and laneways in Kent Town. Improved amenity and access will enliven streets and encourage the community to explore Kent Town.

Clear and consistent aspirations for each street will distinguish the different relationships and influences to the neighbourhood and promote a stronger interface with the new built form.

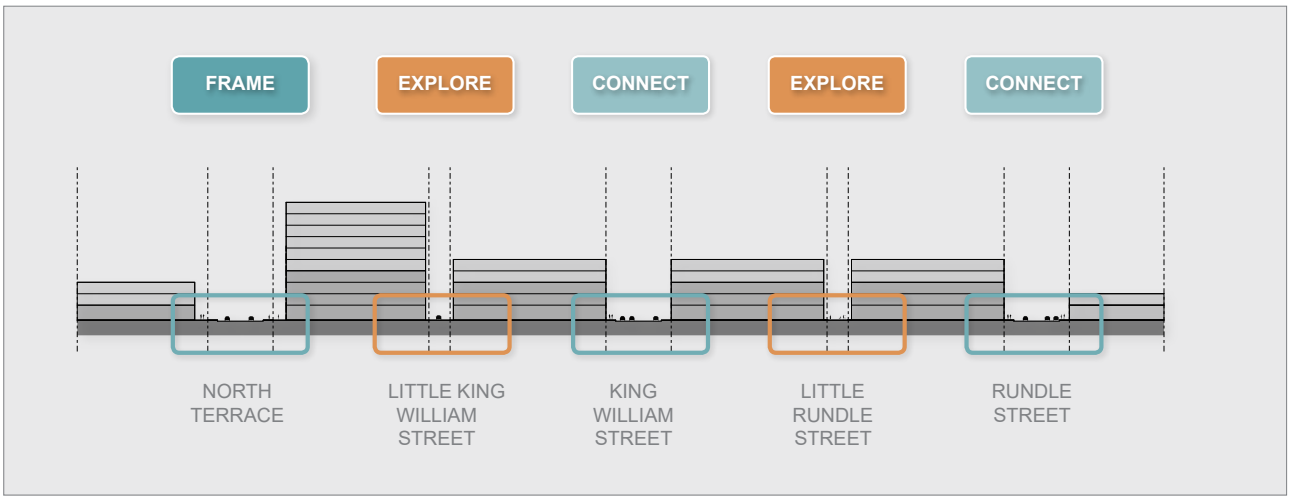


Illustration of *Link & Place* Concept



Map Diagram illustrating Link & Place Concept

3.3 A Creative and Vibrant Neighbourhood

To promote the emergence of the creative industries across Kent Town, championing collaboration and innovation to build prosperity and contribute to the emerging sense of place.

Objectives

- Streamline opportunities for new businesses to establish within Kent Town, in particular those associated with the creative industries.
- Encourage a collaborative culture amongst the local businesses within Kent Town, aligned with creative industries and the act of making, through neighbourhood-based economic development initiatives.
- Support the activation of urban settings to host creative initiatives, such as community events, markets, installations and demonstrations, which add to the changing urban life within Kent Town as well as improve the quality of the public realm and support a more creative 'day-to-day' culture.
- Plan for and integrate new technologies to maximise the competitive advantage of the neighbourhood for businesses and the creative culture.

A Working Neighbourhood

Kent Town is a valued working neighbourhood within the City of Norwood Payneham & St Peters and recognised for its creative communities.

Kent Town was purchased in the late 1830's by Dr Benjamin Kent. He intended to use the land to manufacture bricks, however at the request of Governor Gawler, it became a flour mill in the 1840's before being subdivided into 127 quarter-acre blocks in 1854.

Once subdivided, the diversity of uses for Kent Town has continued to evolve. The changing uses, and the ambition of land owners, local businesses, and social or community groups represents an important part of its legacy and identity.

In 2013, in support of the State Government's aspirations of the *30 Year Plan for Greater Adelaide*, the Council identified particular areas within Kent Town that were suited to potential higher density mixed used development.

As Kent Town begins to experience the next evolution, the impact of future development should not adversely disrupt or jeopardise the needs of existing businesses and residents, including during the typically long construction programs.

A Mixed Use Neighbourhood

The establishment of the Kent Town Urban Corridor Zone is anticipated to accommodate a likely yield of 550 new dwellings (primarily apartments) and an overall capacity for approximately 10,000 square metres of retail floor space and 30,000 square metres of office / commercial floor space. The long-term development potential of Kent Town will bring more people into the neighbourhood to live, work, study or visit.

The increase in apartments could result in over 1000 new people living in Kent Town in the near future, and increased retail, office and commercial space could employ a similar number.

A growth in weekday (workers) and weekend (residents) population will provide greater support towards a more sustainable local economy for a diversity of existing and future business and services.

The understanding and forecasting of the economic appeal of the neighbourhood is as significant as its urban form to achieve a sustainable and meaningful long term evolution. As a 'mixed use' neighbourhood, it is important to understand and, where appropriate, influence the uses that are suitable for Kent Town, respecting the existing businesses and anticipating the change appropriate to the long term vision.

The Design Hub identified the need to undertake a strategic body of work in relation to the economic component of Kent Town, including:

- review and record other existing businesses across Kent Town;
- assess the vacancy and demand profile for Kent Town; and
- consider the development potential of the neighbourhood, and sustainability in relation to particular / desired land use mixes.

The results will enable better decision making to support economic development initiatives and the long term sustainability of the neighbourhood. The results of this strategic body of work will also assist in determining long term requirements in relation to infrastructure provision (high speed internet) and licensing.

Industry Collaboration

Creative industries contributed $853 million to the South Australian economy in 2015-16. Since 2013, the Council has recognised the emergence of a creative industry cluster within Kent Town, in addition to a number of other business and service clusters.

The evolution of Kent Town is an opportunity for local businesses to engage with the potential for change to enhance the way they work and do business, as well as foster greater collaboration across industry to drive economic development.

The Council recognises its role in assisting local initiatives and industry clusters to drive greater economic prosperity and innovation. The original ‘Creative Kent Town’ assessment and mapping of local businesses prepared in 2013 revealed an emerging cluster of creative industries across the neighbourhood. This document was important in bringing greater understanding to the appeal of Kent Town at the time, however much of that information is now out of date.

The “Creative Secrets of Kent Town”, patterned after the Council’s established “Food Secrets of Glynde” and "Food Secrets of Stepney" initiatives, is an opportunity to give greater support and attention to the emerging creative businesses within the neighbourhood.

Activation

In addition to new development, the Council can support the emergence of more effective partnerships with local institutions, businesses, and residents to support smaller scale, short term community events to enliven Kent Town.

Temporary activation of local streets, buildings or vacant blocks can provide short term settings to demonstrate greater interest and appeal within Kent Town and foster the sense of community across the neighbourhood.

The hosting of 'pop-up' markets, open house or public displays, such as the Little Rundle Arts Projects provides important opportunities to demonstrate and test the unique vision, character and identity for Kent Town, and determine the local communities willingness to engage.

It is also an opportunity to test the feasibility in changing the form and function of existing streets or local sites to inform greater design outcomes.



Mural in Rundle Street, Kent Town by artist Jimmy C

3.4 A Resilient Neighbourhood

To create a resilient neighbourhood that integrates natural systems and increases sustainability initiatives in anticipation of a changing urban form.

Objectives

- Maximise opportunity to increase tree canopy cover, to support the amenity of local streets, performance of adjacent buildings, and increased habitat.
- Maximise opportunity for workers and residents to have access to nature, green open spaces and the adjacent Park Lands.
- Integrate green infrastructure into the public realm, including maximising stormwater capture and treatment, permeable paving, and shading of the public realm.
- Promote active transport (public transport, cycling, walking) within Kent Town as a means to move through the neighbourhood as well as to connect to other adjacent destinations (The Parade, CBD and Park Lands).
- Promote the value of green infrastructure in new development to enhance the performance and presentation of new built form.
- Support design, construction and management initiatives that contribute to the reduction of greenhouse gas emissions within the neighbourhood.

A Changing Neighbourhood

Over the last 20 years, Kent Town has become hotter and drier as a result of tree canopy loss across the neighbourhood (9% in public spaces, 23% in private spaces), and the increase in hard surfaces (5% in public spaces, 10% in private spaces).

The changes to the urban environment will have an adverse affect on the health and well-being of those who live and work in Kent Town, and which now presents an opportunity to enhance the urban environment for the benefit of the neighbourhood.

A Greener Approach

As Kent Town evolves from a predominant single storey industrial neighbourhood to a higher density, multi storey mixed use neighbourhood, it must pro actively integrate measures to mitigate against rising urban heat and other potential issues that may emerge as a result of a changing climate.

The City of Norwood Payneham & St Peters is part of the Eastern Region Alliance (ERA) Resilient East Climate Change Adaptation Plan, which identifies mitigation priorities for action, including the need to:

- Increase planting across urban areas;
- Increase the area of open space in strategic locations;
- Prevent development in flood prone areas;
- Improve stormwater management to maximise amenity and water reuse;
- Prepare and implement climate ready guidelines for public places and spaces; and
- Make asset management plans climate ready.

Greener Architecture

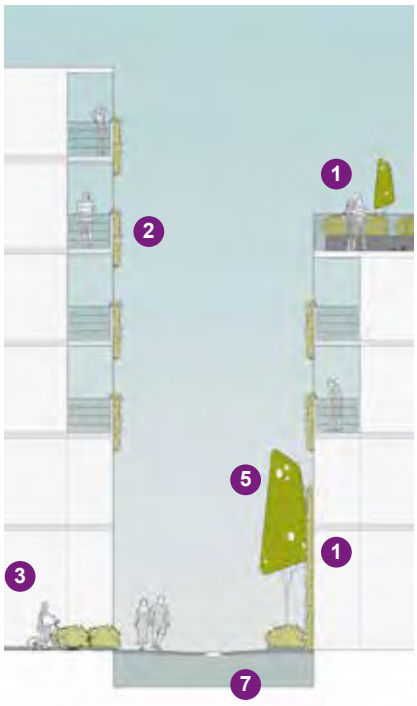
The design of new development across Kent Town should incorporate appropriate environmental design initiatives to improve the local micro-climate, including:

- Green roofs, terraces and walls;
- Integrated landscaping within private balconies;
- Greener private communal spaces integrated into higher density developments;
- Passive heating and cooling design; and
- Specification of materials with low embodied heat.

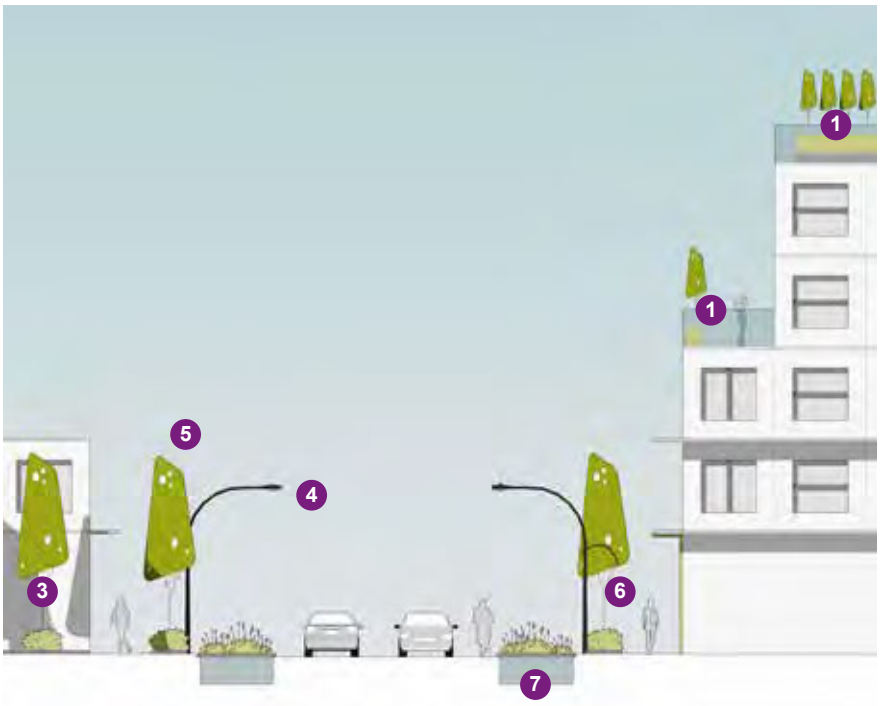
Greener Streets and Public Spaces

The establishment of greener streets across Kent Town will make a significant contribution by the Council towards the long term resilience of the neighbourhood. The design of individual streets should maximise the following:

- Minimise areas of exposed hard paving;
- Prioritise continuous tree canopy, targeting a long term 40% tree canopy cover;
- Enhance tree pit design to achieve deep soil zones and healthy root growth;
- Increase shrub planting at streetscape levels to improve the local amenity and community well being;
- Maximise Water Sensitive Urban Design initiatives as part of an integrated streetscape design, to promote stormwater capture and release;
- Promote opportunities for cycling and walking across Kent Town and in connection with the adjacent precinct; and
- Specification of sustainably sourced materials with low embodied energy.



Typical Section - Laneway



Typical Section - Street

A Greener Neighbourhood

1. Green roofs, terraces and walls
2. Integrated landscaping within private balconies
3. Greener private communal spaces integrated into higher density developments
4. Specification of 'smart', low energy infrastructure
5. Increased tree canopy
6. Cooler streetscapes, with more garden beds, and materials with low embodied heat
7. Water Sensitive Urban Design

4.0 Implementing the Vision

The next evolution of Kent Town will rely on the individual contribution of many towards a shared vision for the neighbourhood.

Partnerships will be essential to foster a shared ownership, responsibility and commitment to enhancing the quality of life for all within Kent Town.

The Urban Design Framework recognises the contribution of different stakeholders towards implementing the long-term vision in partnership with the City of Norwood Payneham & St Peters. The key stakeholders to the implementation include:

- Property owners;
- Developers;
- Businesses;
- Local residents; and
- State Government.

As the custodians of Kent Town, the City of Norwood Payneham & St Peters, has the responsibility to champion a greater vision for Kent Town, and to achieve a greater community benefit from the anticipated change.

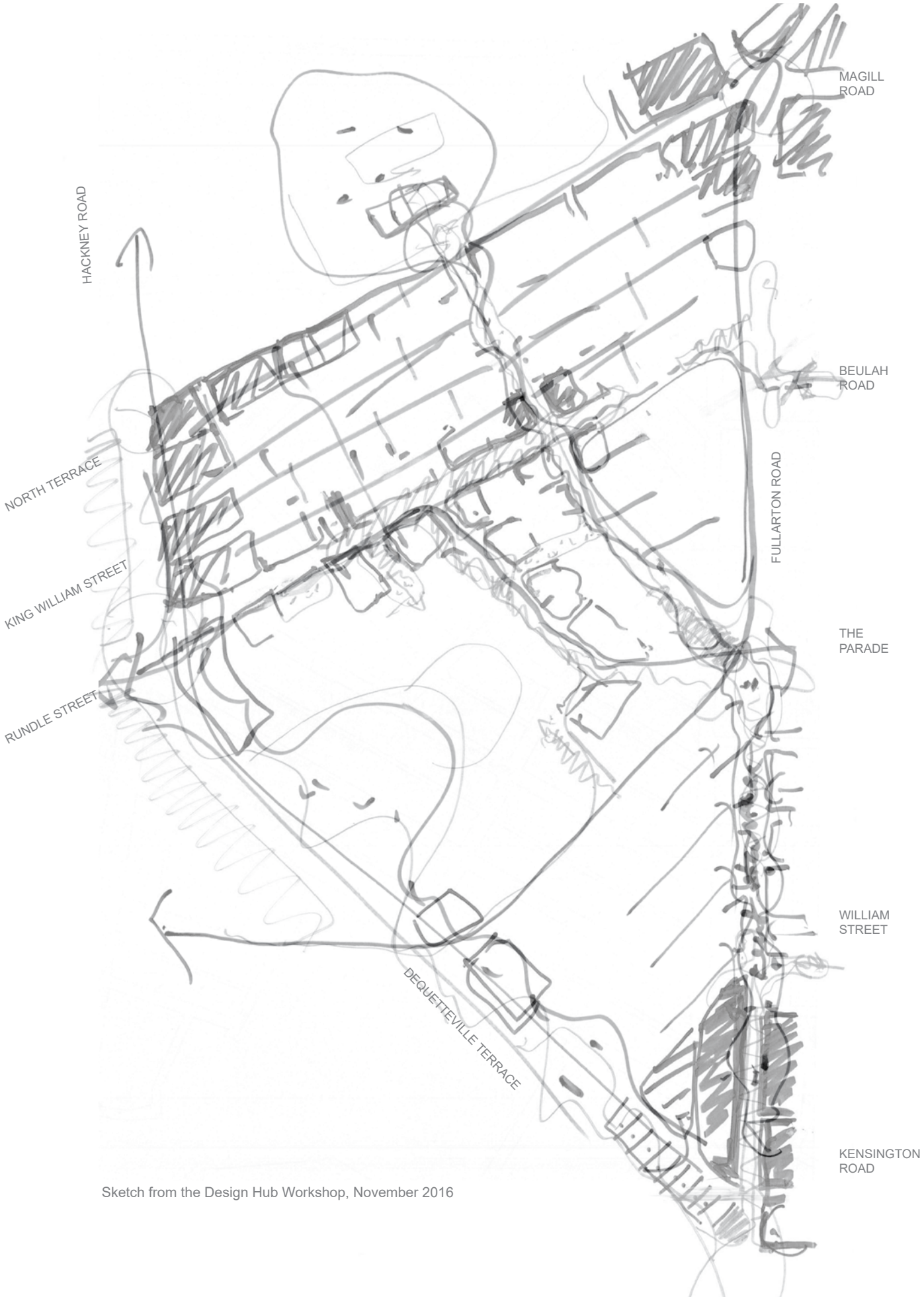
The Urban Design Framework recognises the following opportunities to demonstrate leadership and build stronger partnerships, through enabling change and determining the scale of change in the public realm.

The Council has the ability to cluster public realm development to maximise the scale of change and neighbourhood benefit, which will be realised through partnerships with key stakeholders.

Partnership Principles

The following principles form the basis for all public realm partnerships to create a better public realm within Kent Town.

- The Council and the developer will co-fund the detail design and documentation of all public realm works, to the agreed standards and approval of the Council.
- The developer is responsible for the replacement of all damaged urban elements, to the standards established in the Public Realm Guidelines (paving, kerbs, etc).
- The Council will fund a new suite of street furniture at appropriate locations. The developer will fund the installation costs of replacement furniture.
- The Council is responsible for wider neighbourhood initiatives (e.g. street lighting, road crossings, way-finding signage, tree pits, water sensitive urban design, assets / infrastructure upgrades).
- The developer is responsible for the design, documentation and construction of any localised protuberances or other installations within the streetscape (including localised adjustment to services to suit).
- The Council will be required to review and approve any proposed installation, appropriate to the vision and guidelines established for Kent Town.



Sketch from the Design Hub Workshop, November 2016

4.1 Enabling Change

The Urban Design Framework provides the tools for Council to ensure that change across Kent Town achieves a co-ordinated and sustainable evolution towards a common vision, through three levels of influence and impact.

Lead

The Council is responsible for the long-term management of a range of Council-owned assets across Kent Town, including footpaths, kerbing, road surfaces, trees, furniture, lighting, and signage.

Through the strategic alignment of the asset renewal program, the Council is able to demonstrate its aspiration for Kent Town through the implementation of a new public realm palette for the neighbourhood.

The introduction of distinctive pavers, new street furniture, additional trees, new planting beds and public art will demonstrate the new standards for the public realm across the neighbourhood.

The *Kent Town Public Realm Manual* will outline the performance standards for the design and construction of the streetscapes within Kent Town, and will be supported by appropriate Council policy to set out developer expectations. In addition to a more systematic approach to asset management, the Council is able to work with local businesses or industry clusters to better promote local economic development initiatives, as well as community building events.

Influence

The Council can work constructively with State Government to encourage investment within Kent Town, in coordination with the Urban Design Framework.

This investment could include:

- Investment in key road corridors to improve pedestrian amenity, safety and traffic congestion, in response to the Urban Design Framework aspirations which place greater value on the 'place' qualities of key streets;
- Improve public transport, ensuring the integration of local stop settings is in co-ordination with the Urban Design Framework;
- Promote partnerships with State Government agencies to upgrade existing aging infrastructure (e.g. stobie poles), street lighting and stormwater to provide for improved public and private development opportunities as well as business requirements for a SMART city; and
- Promote partnerships with State Government and the City of Adelaide to improve accessibility, amenity and activation of the adjacent Adelaide Park Lands, through greater collaborative planning approach.

Encourage

There are many stakeholders in the evolution of Kent Town, with varying levels of ownership within both the public and private realms. To realise the vision for the neighbourhood, the Council will need to encourage these stakeholders to work towards this vision through new development and public realm investment, which can be achieved by:

- Engaging with the Development Assessment Process (through DPTI / ODASA) to better inform and influence the Inner Metro Case Management and Design Review Processes in support of the new vision for Kent Town;
- Identifying opportunities for new development to contribute to the quality of the public realm surrounding development sites, including better integration of ground floor land use, through the availability of a Kent Town Streetscape Palette and partnering mechanism;
- Maximising opportunities for new development to enhance the interface at the street and extend to the adjacent streetscape, supporting improved public linkages, promoting greater street level activation, as well as support inequality architecture, landscape and public art responses; and
- Promoting early engagement with developers to align / raise expectations, highlight opportunities to contribute as well as hold developments accountable for their alignment to the vision and aims of the neighbourhood.

By leading change, influencing investment and encouraging stakeholders to work towards the vision for the neighbourhood, the aspirations for the evolution of Kent Town will be realised for the benefit of existing and future communities.

LEAD	INFLUENCE	ENCOURAGE
COUNCIL OWNED ASSETS	**STATE OWNED ASSETS**	**PRIVATE DEVELOPMENT**
• Footpaths • Roadways • Tree planting • Landscaping • Furniture • Lighting • Signage	• Main roads • Public transport • Community services infrastructure	• Streetscape interface • Streetscape activation • Built form • Communal spaces • Landscaping • Roof gardens • Laneways and linkages

4.2 Scale of Change

Kent Town has been established through ad-hoc and organic evolution, rather than a planned or prescriptive approach. The transformation of Kent Town in the years ahead will occur at different speeds and scales and will require a management approach to change that is flexible and opportunistic to suit each new idea, proposal or project.

Curate change

The Council is responsible for effective curation of individual, localised change that collectively works towards the long-term evolution of the neighbourhood.

Change across Kent Town provides unique opportunities to test ideas, to promote innovation and reveal new possibilities in line with the neighbourhood vision.

The scale of change can be understood as three different interventions.

Capture

Individual development sites will provide locations to construct a new streetscape standard in partnership with local businesses or developers. These local enhancements will provide a better quality public realm, that supports new development for a broader public benefit.

Cluster

In certain locations across Kent Town, the Council may choose to combine opportunities for streetscape enhancements between individual developments to achieve greater public realm outcomes. This could be realised through infill streetscape works or the addition of other initiatives to achieve greater strategic benefits, including mid-block crossings, street corner re-design or rain gardens for example.

Culminate

Initially, local developments will advance small-scale streetscape improvements across Kent Town. The ad-hoc nature of development will reinforce the organic evolution of the neighbourhood that has occurred to-date.

However, as the development potential of Kent Town is realised over time, the presentation of local streets will begin to reflect greater consistency towards the new vision.

With only few development sites remaining, the Council will lead the infill of the remaining streetscape sections to complete the long-term transformation of local streets in accordance with the vision for Kent Town and its new public realm.

The long-term transformation will rely on strong leadership, commitment, consistency and effective collaboration with multiple stakeholders.


CAPTURE


CLUSTER


CULMINATE

4.3 Streetscape Enhancement Proposals

The Norwood, Payneham and St Peters (City) Development Plan, the Kent Town Urban Design Framework, and the Kent Town Public Realm Manual are intended to align the expectations of the Council with interested stakeholders to enable lasting change across neighbourhood.

The suite of strategic documents sets outs a vision for Kent Town, it confirms the future aspirations for local streetscapes and provides the detail to implement the vision through enhancements across Kent Town.

The vision and aspirations are intended to encourage a better built form that engages with the local streets, and contributes to the wider neighbourhood appeal.

The Council is willing to work more collaboratively with land owners and developers to ensure the opportunity to engage with new development best aligns with the higher vision for Kent Town.

In particular, the Council is wanting to encourage:

- greater design influence and integration between the streetscape and the planning and design of local sites, in particular the interface with ground floor / first floor;
- the expansion of local amenities at appropriate locations towards a new vision for the neighbourhood, as well as integration of wider neighbourhood initiatives (e.g. street tree planting, lighting, road crossings, wayfinding signage, tree pits, water sensitive urban design);
- opportunities to enable localised interventions, including mid block and street corner protuberances in co-ordination with local developments;
- opportunities to cluster public realm enhancements in conjunction with local development sites, to maximise the scale of change and neighbourhood benefit; and
- opportunites for community engagement in order to maintain the strong sense of community that exists among local residents.

The Design Process

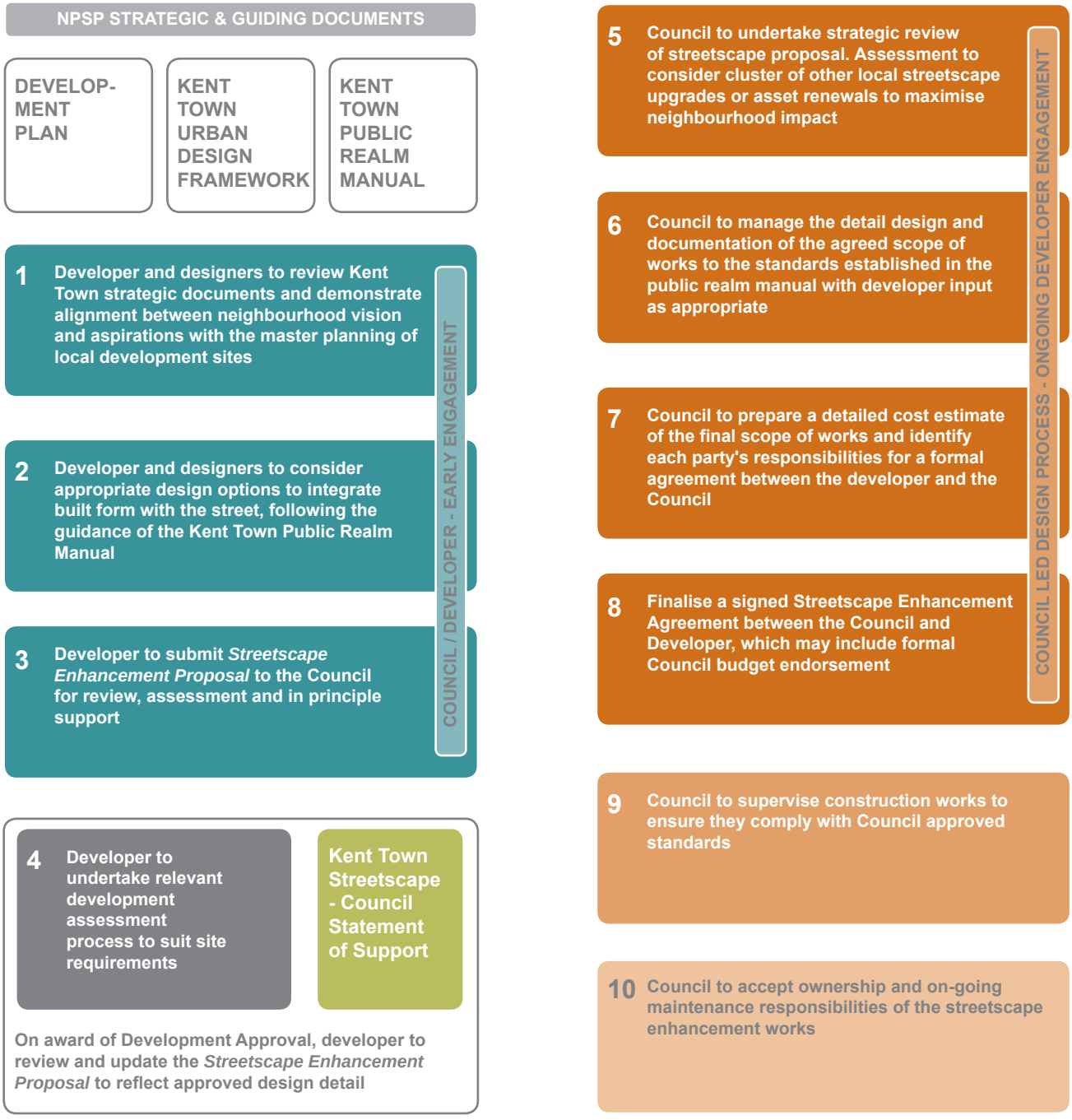
To ensure effective partnerships can be built, the Council is committed to pro-actively engaging with the design process, spanning from initial concept plan engagement, through to construction of streetscape works and ongoing management.

The identified process for streetscape enhancement proposals is shown on the following page. The intent in developing an Urban Design Framework and Public Realm Manual is to ensure that the Council's aspirations are established upfront and accessible for developers, businesses and residents to understand and incorporate into the early concept design approach.

Development Partnerships

The Council wants to engage in positive partnerships with local developers to enable streetscape enhancement in accordance with the following principles, roles and responsibilities.

- The developer is responsible for the replacement of existing footpath paving adjacent the new development plus any damaged or removed assets (e.g. kerbs and gutters, street trees) to the new standards established in the Public Realm Manual.
- The Council is responsible for any new street trees, garden beds and furniture (e.g. seats, bike racks, rubbish bins) adjacent a new development. The Council is also responsible for wider neighbourhood initiatives (e.g. street tree planting, lighting, road crossings, wayfinding signage).
- The developer is responsible for any localised protuberances (i.e. footpath widening) or bespoke installations (e.g. artwork) that are proposed by the developer. The Council will consider any proposed installations and approve those which are considered appropriate to the vision and principles established for Kent Town.
- The Council and the developer will equally co-fund the detail design and documentation of all public realm works, to the agreed standards and approval of the Council.
- The Council reserves the right to co-ordinate and combine individual streetscape projects, including additional Council-led works, to maximise the community benefit and scale of change.
- All construction works will be undertaken under the supervision of the Council and to the standards approved by the Council.


NPSP STRATEGIC & GUIDING DOCUMENTS
DEVELOP-MENT PLAN
KENT TOWN URBAN DESIGN FRAMEWORK
KENT TOWN PUBLIC REALM MANUAL
1 Developer and designers to review Kent Town strategic documents and demonstrate alignment between neighbourhood vision and aspirations with the master planning of local development sites
2 Developer and designers to consider appropriate design options to integrate built form with the street, following the guidance of the Kent Town Public Realm Manual
3 Developer to submit Streetscape Enhancement Proposal to the Council for review, assessment and in principle support
COUNCIL / DEVELOPER - EARLY ENGAGEMENT
4 Developer to undertake relevant development assessment process to suit site requirements
Kent Town Streetscape - Council Statement of Support
On award of Development Approval, developer to review and update the Streetscape Enhancement Proposal to reflect approved design detail
5 Council to undertake strategic review of streetscape proposal. Assessment to consider cluster of other local streetscape upgrades or asset renewals to maximise neighbourhood impact
6 Council to manage the detail design and documentation of the agreed scope of works to the standards established in the public realm manual with developer input as appropriate
7 Council to prepare a detailed cost estimate of the final scope of works and identify each party's responsibilities for a formal agreement between the developer and the Council
8 Finalise a signed Streetscape Enhancement Agreement between the Council and Developer, which may include formal Council budget endorsement
COUNCIL LED DESIGN PROCESS - ONGOING DEVELOPER ENGAGEMENT
9 Council to supervise construction works to ensure they comply with Council approved standards
10 Council to accept ownership and on-going maintenance responsibilities of the streetscape enhancement works

5.0 Case Studies

The following case studies are intended to be a growing record of the better planned interventions in the evolution of Kent Town.

The Council's strategic approach to Kent Town builds on the organic and ad-hoc character of the neighbourhood, to include improve amenity, accessibility and activation of local streets.

The case studies are a demonstration of the positive contribution partnerships between the Council and local developers can have in enabling change across Kent Town.

The case studies include:

1. Verde Living Apartments, 54-60 King William Street, Kent Town; and
2. East Park Apartments, 1 King William Street, Kent Town.

Each development was completed in 2017. The streetscape enhancements adjacent to each development were completed in August 2018.



King William Streetscape, East Park Apartments, August 2018



Map of Kent Town Showing Case Study Locations

5.1 Verde Living

The Verde Living development, located at 54-60 King William Street, Kent Town delivered 47 apartments, seven of which are SOHO apartments, and six commercial tenancies, resulting in an overall investment of approximately $28 million.

The Verde Living Streetscape Enhancement Project includes two related sites, the King William Street frontage (northern boundary) and the Little Rundle Street frontage (southern boundary).

King William Street

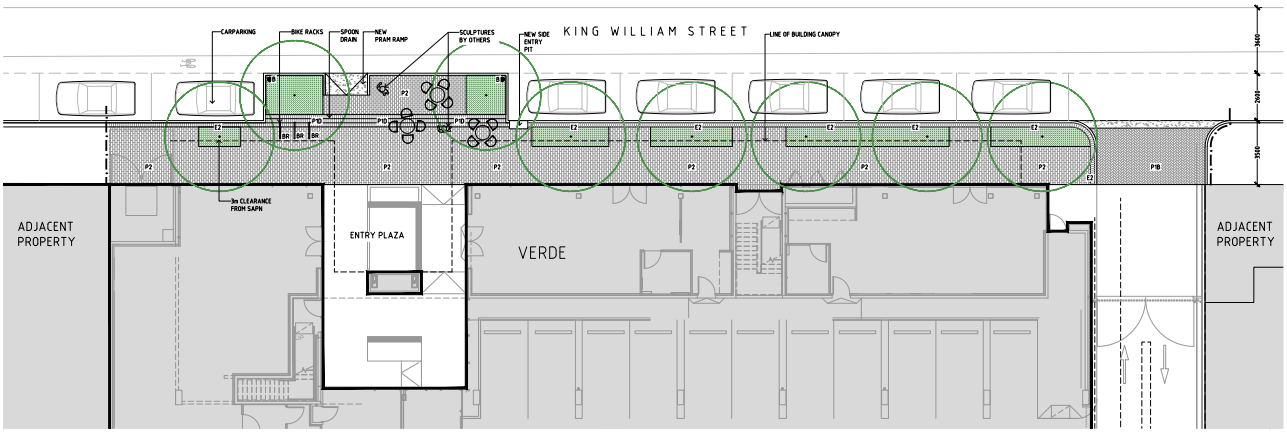
King William Street is proposed to be a tree lined pedestrian focused streetscape where new retail, hospitality and businesses can engage and activate the street. The enhancement to King William Street includes:

- footpath paving, which is proposed to be replicated along other streets within Kent Town;
- street tree planting to increase tree canopy cover along King William Street;
- garden beds to improve the attractiveness of the street;
- street furniture such bike racks and a rubbish bin;
- removal of the three redundant driveway crossovers, which allows an additional three on-street parking spaces; and
- a paved protuberance in front of the main entry to the Verde Living Apartments, nominally the length of two car park spaces. The protuberance incorporates tree planting, garden beds and public art (provided by the developer).

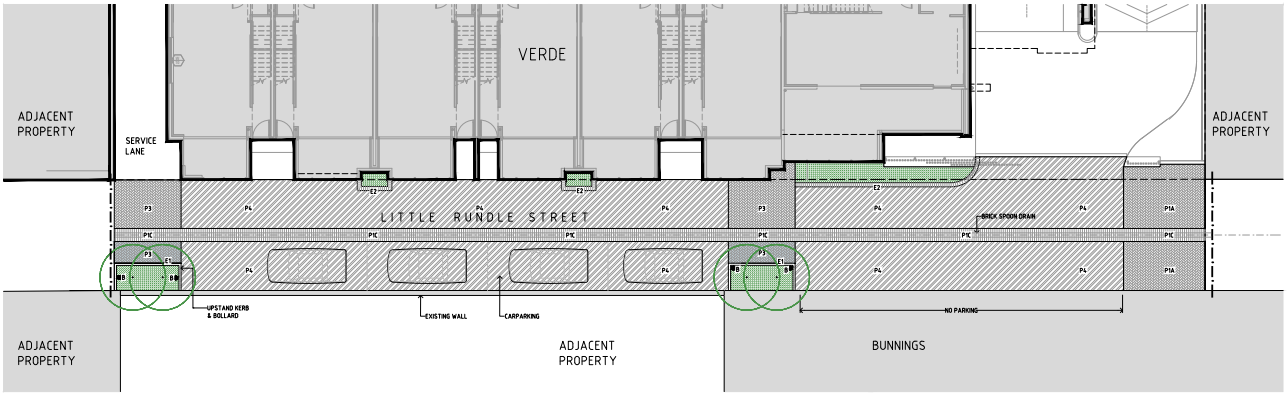
Little Rundle Street

Little Rundle Street is the “front door” to new SOHO apartments. The changing scale and density of development requires a slower speed environment to safely accommodate an increase in pedestrian and cyclist activity, as well as greening to improve the liveability of the laneway. The enhancement to Little Rundle Street includes:

- pavement resurfacing and a central concrete spoon drain to convey stormwater flows;
- a north/south pedestrian link through the development to improve access and connectivity;
- garden beds and tree planting to improve the amenity and comfort (i.e. cooling effect from shade) and encourage slower vehicle speeds; and
- signage and line-marking to suit the changes in land use, servicing and parking requirements in the laneway.



01 LAYOUT PLAN 1
SCALE 1:100



02 LAYOUT PLAN 2
SCALE 1:100

Streetscape Plan adjacent Verde Living, Kent Town by Oxigen Landscape Architects

5.2 East Park

The East Park development is located at 1 King William Street, Kent Town. It comprises 98 apartments and nine townhouses, which has resulted in an overall investment of approximately $70 Million.

The East Park Streetscape Enhancement Project has three frontages, the Dequetteville Terrace frontage (western boundary), the King William Street frontage (southern boundary), and the Little King William Street frontage (northern boundary).

Dequetteville Terrace

Dequetteville Terrace is proposed to be a landscaped boulevard to complement the amenity the adjacent Adelaide Park Lands. The enhancement to Dequetteville Terrace includes:

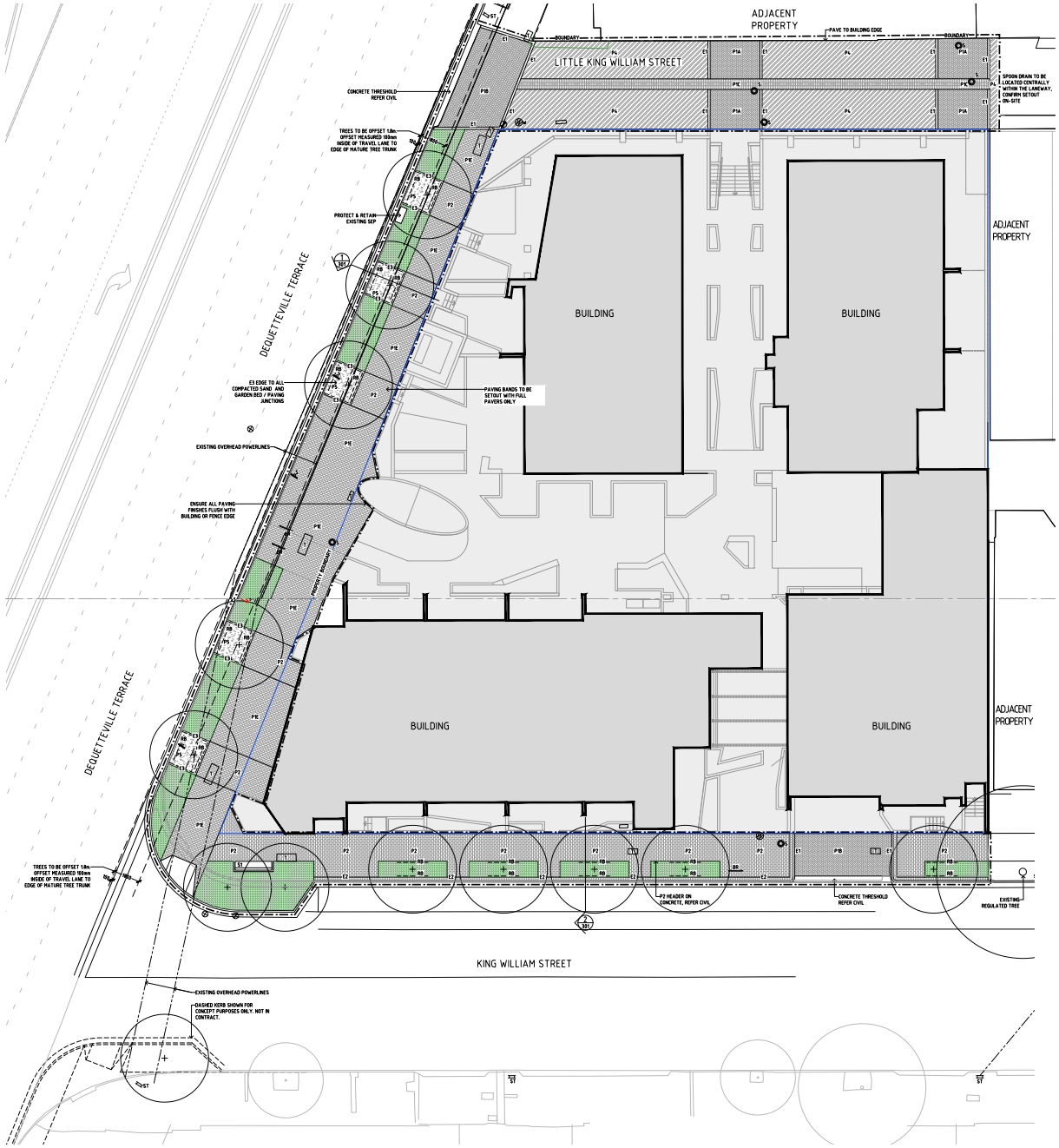
- footpath paving, which is proposed to be replicated along other main roads in Kent Town;
- street tree planting to increase tree canopy cover along Dequetteville Terrace;
- garden beds to improve the attractiveness of the street;
- street furniture such a bench, bike racks and a rubbish bin; and
- a corner kerb protuberance at the intersection with King William Street to improve pedestrian access and safety.

King William Street

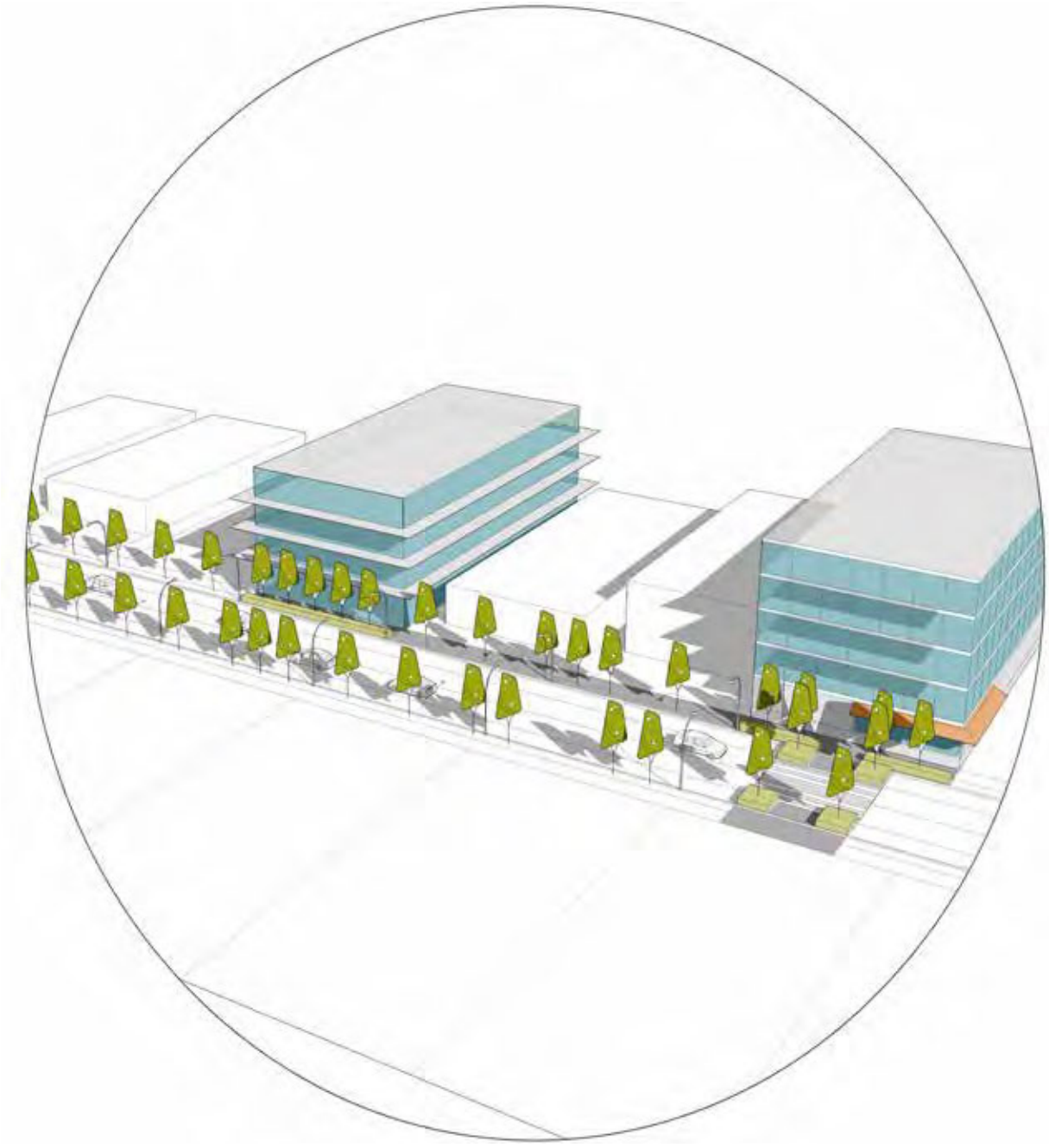
The streetscape improvements adjacent the East Park Apartments are similar to those on King William Street adjacent the Verde Living Apartments for consistency (refer to page 36).

Little King William Street

The laneway improvements to Little King William Street adjacent the East Park Apartments are similar to those on Little Rundle Street adjacent the Verde Living Apartments for consistency (refer to page 36).



Streetscape Plan adjacent East Park, Kent Town by Oxigen Landscape Architects



City of Norwood Payneham & St Peters
175 The Parade, Norwood SA 5067

Telephone 8366 4555
Email townhall@npsp.sa.gov.au
Website www.npsp.sa.gov.au

DTI:PlanSA Submissions

From: Trish Hansen [redacted]
Sent: Monday, 6 November 2023 12:25 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: MASTER _Kindred Australia GARP Submission.pdf

You don't often get email from [redacted] Learn why this is important

Dear Planning SA Team

Please find Kindred Australia's GARP submission attached.

All the best with collating the feedback.

Please let us know if we can provide further information or assistance.

Kind regards
Trish

Trish Hansen
Kindred Australia - Chief Executive Officer
[redacted]
www.kindredaustralia.org

Dear South Australian Planning Commissioners,

Thank you for the opportunity to contribute to the consultation process on shaping South Australia's Greater Adelaide Regional Plan (the GARP)..

The arts, creative expression, cultural connection and play all have a significant role in contributing to the goals defined in the draft plan.

The evidence of the unique and transformative impact and value of arts and culture for children and young people, especially those experiencing disadvantage, is clear.

Kindred exists to strengthen the focus on these critically important areas of healthy child and youth development, to catalyse flourishing and ultimately build a stronger society.

We propose on key amendment:

Include **Cultural Connection** as an additional core outcome for 'how Adelaide should grow'.

This will enable the unique value and impact of cultural connection to be recognised in shaping the health, wellbeing and vitality of residents, social cohesion, the richness of visitor experiences, as well as the meaning and viability of our future industries.

The GARP needs to articulate how planning over the next 30 years, will cultivate the conditions for children and young people to flourish through connecting deeply with their local biodiverse natural environments, honouring First Nations wisdom, culture, language and ways of being and participate in creative expression, play and other culturally enriching activities.

A key outcome of arts and cultural engagement for children and young people is an enriched sense of belonging, a sense of place, a sense of community, a sense of connectedness to the world around us.

Becoming familiar with local cultural stories, through connection to nature, local food production, public art and historical artefacts, helps children and young people develop a sense of belonging, connection, ownership and responsibility for their place.

This contributes to wellbeing, resilience and flourishing; less anxiety and mental illness, healthier relationships, greater capacity to learn and develop skills necessary to effectively cooperate and collaborate, which are critically important for employment and being an effective member of the community.

Arts improves a community's capacity to act and builds trust and cooperation. Regular attendance at concerts, performances, events and exhibitions enables young people to make sense of the rich and complex human condition and our place in the world.

Evidence-based practice

Here is some evidence-based knowledge regarding the value and impact of arts and culture for children and young people that is particularly relevant to the development of the GARP.

Arts and Culture improves the social and emotional wellbeing and mental health of children and young people.

Research shows that taking part in arts and cultural experiences builds resilience and self esteem,[1] improves mental health and wellbeing, and provides opportunity for emotional development, self-regulation and positive identity formation.[2]

The evidence also demonstrates that playing music, participating in making and creating art provides a constructive way for young people to process and express their feelings, especially traumatic, complex and ambiguous emotions.

Music and arts-based programs reduce depression and improve social and emotional wellbeing and resilience for children in disadvantaged and high need communities.[3] It is also understood that music education reduces cortisol (a stress hormone) levels among elementary school students.[4]

Importantly, evidence also exists to show the that the arts can play an important role in suicide prevention.[5]

Arts and culture reduces crime and recidivism among young people.

Providing children and young people with opportunities to express themselves creatively, engage in creative and cultural activities and connect deeply with nature, reduce criminal and delinquent behaviour and recidivism.

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[1] The arts build resilience and self-esteem in young people (Canadian Council on Social Development, 2001; Department of Justice Canada, 1999; Eccles and Barber, 1999).
[2] Catterall, Champleau, & Iwanaga, 1999; Palmer Wolf, 1999; Seidel, 1999.
[3] The Royal Conservatory. (2014). The Benefits of Music Education: An Overview of Current Neuroscience Research. Toronto: Canada, The Royal Conservatory of Music. 9pp.
[4] Frank Lindblad, Åsa Hogmark, Töres Theorell (2007) Music intervention for 5th and 6th graders—effects on development and cortisol secretion. Stress & Health, Volume23, Issue1 February 2007, Pages 9-14. https://doi.org/10.1002/smi.1109
[5] Olsen, Nicola, and Chiao Wen Lan. "Theatre-based programmes for suicide prevention among adolescents: A scoping review of process and impacts." Journal of Applied Arts & Health (2023).

Arts engagement and participation for young people involved with or at risk of becoming involved with the youth justice system promotes more positive outcomes.

Arts-based afterschool programs for students from low socioeconomic backgrounds reduce criminal and delinquent behaviour in low income housing areas.[6]

People who attend live music are almost twice as likely to have a stronger sense of belonging to their city or town compared to those who don't attend.[7]

Arts and culture cultivates healthy friendships and relationships among children and young people.

Social isolation is a growing issue for young people, especially those experiencing disadvantage, and they are more likely to feel threatened, be overwhelmed by rejection and loneliness.[8]

When young people connect with and care for others through the arts, those feelings can be mitigated and a sense of social connectedness reaffirmed.

The evidence demonstrates that through movement and dance, we can build neural synchrony with each other. Listening and performing music with a group can lead to better social cohesion and bonding, while painting a mural or creating public art together can improve individual and community well-being.[8]

Reading poetry together or taking part in a spoken word performance yields mental health benefits.

The arts also strengthen identity and encourage self-directed learning and self-efficacy and connect young people to themselves and each other.

Arts and culture improves engagement at school and academic performance.

Arts and culture plays a significant role in shifting from languishing to flourishing, which translates to outcomes across many areas of life including school performance.

Music study leads to lasting changes in children's brains, increasing their capacity to perform tasks that require sustained attention and careful listening and reading.

Creativity and creative problem-solving skills are developed significantly through arts involvement.

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[6] Daykin et al 2012
[7] Community Foundations of Canada (20160. Vital signs:arts and belonging.
[8] Human Flourishing and the Arts in Unprecedented Times: Part II

Students from low socioeconomic backgrounds involved in school-based arts programs demonstrated increased creativity, lower dropout rates, increased social skills, and higher academic achievement.

Nine out of ten Australians agree that the arts are an important part of education for everyone.[9]

All South Australian Arts and Cultural organisations, including the Art Gallery of SA, the SA Museum, the Adelaide Festival Centre, the Adelaide Botanic Garden, the State Library of SA have committed human and program resources for the delivery of educational programs. This is a significant resource for South Australian Children and Young people.

Despite SA Arts organisations earnestly seeking to engage diverse audiences, a range of barriers for our most disadvantaged children and young people accessing programs still persist.

Low-income students who are involved in arts activities have higher academic achievement.[10]

Music and arts based programs bridge the gap in school achievement and improve grades in English, Mathematics, Science and Technology for children in disadvantaged and high need communities.[11]

Arts and culture improve employment outcomes for young people.

Many arts activities are dependent upon collaborative efforts, teaching valuable teamwork skills[12]

The arts help in the successful transition to adulthood and the development of in-demand job skills. The arts connect learning experiences to the world of real work and assist in developing job skills.[13]

Arts and cultural experiences impact brain function and can help expand mindsets to think creatively and contribute to ideas creation and problem solving.

Young people involved in sustained, structured community-based arts programs exhibit increased abilities to complete tasks.[14]

Arts and culture improves outcomes for young people facing socio-economic disadvantage.

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[9] Australia Council for the Arts (2014) ‘Arts in Daily Life: Australian participation in the arts’
[10] Catteral, James S. (2012). The Arts and Achievement in At-Risk Youth: Findings from Four Longitudinal Studies. Washington, District of Columbia: National Endowment for the Arts
[11] Vaughan, Tanya, Harris, Jessica. (2011). Bridging the Gap in School Achievement Through the Arts. Victoria, Australia: The Song Room.
[12] Department of Justice Canada, 1999; President’s Committee on Arts and the Humanities, 2005.
[13] Fiske, 1999; Murfee, 1995; Smyth & Stevenson, 2005; Wright, John, Offord, & Row, 2004.
[14] Oreck, Baum, & McCartney, 1999; Wright, John, Offord, & Row, 2004.

Participation in the arts has social benefits including personal growth, community development, and social cohesion.[15]

Arts, creative expression, play and culture might be embedded in the GARP in the following ways:

Grow Capacity: Explore, find and systemise ways for children and young people to attend, learn and participate in arts and culture regularly by identifying and brokering opportunities for them to:

- attend exhibitions and events, go to the theatre and concerts, connect with collections
- learn how to make art, play music and perform
- creatively express their experiences and emotions
- play freely in thriving biodiverse environments
- gain work experience and volunteer in arts and culture organisations
- safely commute to participate in diverse activities.

Advocate: Amplify and promote the value of arts and culture for children and young people, especially those experiencing disadvantage, by:

- collating evidence of the value of arts and culture
- communicating the unique value and impact of arts and culture in engaging and creative ways
- broadly mapping the child and youth arts and cultural ecosystem and the child and youth social service ecosystem and identify alignment
- ensuring new developments include biodiverse ecosystems and open public space
- ensuring new infrastructure developments include safe, appropriately programmed and managed creative and community places for children and young people to simply hang out for free and/or participate in creative and cultural activities
- acknowledging, amplifying and resourcing local libraries as places of cultural connection
- encouraging Local Government Areas to invest in arts and cultural infrastructure and well resourced programming.

Build Capability: Strengthen the knowledge, skills and systems capability of the planning sector by:

- providing training regarding the value and impact of arts and culture fro children and young people
- making it easy for young people from radically diverse backgrounds to become planners

Connect: Contribute to catalysing trusted relationships and help weave strong networks across the child and youth arts, culture organisations throughout the next phase of engagement on the GARP by:

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[15] Matarasso, Francois. (2003). Use or Ornament? The Social Impact of Participation in the Arts. Gloucester, United Kingdom: Comedia.

- develop and demonstrate innovation excellence in relation to child and youth engagement
- make it easy for diverse children and young people to be genuinely engaged in the next phase of the 30 year plan
- find ways to genuinely engage children and young people in the design of major infrastructure projects.

About Kindred Australia

Kindred Australia exists to enrich the lives of children and young people, especially those experiencing disadvantage, through arts and culture.

In 2021, Kindred Australia was established as a charity following extensive dialogue with multiple social service providers and arts & cultural organisations.

There was clear and broad recognition across both sectors that children and young people experiencing disadvantage do not have the same opportunities to make art, learn music, go to the theatre or galleries or connect with cultural stories and collections as others, for myriad complex reasons.

Additionally, the lives of children and young people experiencing disadvantage are often disrupted and not enriched with the generations of traditions, family stories and rituals, heirlooms, recipes and experiences other children and young people enjoy.

In October 2021 and again in October 2023, Kindred Australia brought together leaders across arts & culture and social services leaders with young people with lived experience of being in care, in collaborative workshops.

The conversations and insights from the workshop reinforced the need for stronger advocacy of the unique value and impact of arts and culture, greater embedded capacity within the sectors, better connections and networks across sectors as well as more capacity and opportunities for children and young people experiencing disadvantage to participate.

We welcome the opportunity to work with the South Australian Planning Commission to ensure these vital aspects of child development are incorporated into future actions aimed at improving and enriching the lives of children and young people.

The Board and Staff of Kindred Australia thank you for the opportunity to contribute to shaping the GARP. We look forward to following the development of the plan and hope to contribute to its delivery.

6 November 2023

DTI:PlanSA Submissions

From: cj thredgold <[redacted]>
Sent: Monday, 6 November 2023 2:12 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: MLS GreaterAdelaideRegionalPlan.pdf

You don't often get email from [redacted] Learn why this is important

Thank you for the opportunity to provide comment on the above discussion paper.

Please find attached a submission from the Marion Living Smarties group.

Regards

CJ Thredgold
(on behalf of the Marion Living Smarties)

Response to the Greater Adelaide Regional Plan (GARP) discussion paper

We thank the Commission for the opportunity to converse with you about our suggestions and concerns for the Greater Adelaide Regional Plan. We are a local community sustainability group, 'The Marion Living Smarties' (MLS), made up of residents from the City of Marion and City of Holdfast Bay who have completed one of the many Living Smart courses run in Adelaide (Living Smart is a seven week environmental sustainability community course supported by Green Adelaide, local councils and community groups).

As a group we promote more environmentally sustainable behaviours within our community and challenge our local governments to do more when it comes to environmental issues. Recently we have organised the Love Our Local Trees campaign and event, gathering stories of connection to trees from residents. Please see Appendix 1 for the community's love letters to trees and we submit this as part of the evidence base for the review of policy relating to infill, trees and open spaces.

We have read the Discussion Paper and some of us were able to attend information sessions. Overall, the MLS support the guiding outcomes for the Greater Adelaide Region, however, living and often working in the South and Western suburbs of metropolitan Adelaide we do not believe that what is currently happening is working towards these outcomes. There is a big gap in the vision / strategy and what the policies implemented on the ground are providing. We know the science tells us we cannot keep going with 'business as usual'. We are entering a period of monumental change, for example, environmental loss, food security, extreme weather events, demographics, etc., and wealthy societies like ours must transition rapidly to a low emissions environment. Governments need to stop focussing primarily on economic measures of success and development at all costs and create a place of wellness and a liveable Greater Adelaide for all to enjoy.

The focus of our response is: open space, trees and urban canopy, infill, and the Living Locally concept.

Open Space and urban greening

Which areas need conservation and protection?

Urban places and people need quality green space (with high biodiversity outcomes and creating active connected local communities). Nature is vital for wellbeing, physical and mental health, as well as supporting a healthy natural environment (plus cooling the suburbs). Humans and other critters need TREES (especially the big old ones) for cooling, amenity, homes for birds and insects. In some neighbourhoods **trees are being lost at an alarming rate**, the Conservation Council estimates 75,000 trees a year from both private property and on public land (often for road projects at a time governments should be spending to improve public transport and safe cycling routes). In some suburbs they are going backwards in providing a cooling canopy.

Governments should do more to retain and protect all existing open space, including the Adelaide Parklands. The Parklands have been on the National Heritage Listing for 14 years and yet not on the State Heritage Listing. This loophole needs to be closed. The Parklands belong to all the people of South Australia and need to be protected. Adelaide remains the only city in the world surrounded by parklands, open to everybody and with benefits for all South Australians to enjoy. But the Adelaide Park Lands are shrinking due to successive Government's chipping away at this "free land" for infrastructure projects. There is no mechanism to reclaim the land back.

Our response:

1. Accept all 13 recommendations in the Urban Forest Interim Report and immediately implement them to protect the remaining canopy and large trees in Adelaide's suburbs.
2. Protect in legislation, and consider in development decisions, existing urban trees and established gardens in the middle suburbs.
3. Conserve and protect land and nature for future generations:
    a. Concentrate well designed growth within the existing footprint of metropolitan Adelaide, providing structure planned neighbourhoods and mixed-use precincts of various scales and combination of land uses.

b. Integrate development in townships (rather than the 'dormitory suburbs' tacked onto the edge of towns e.g. Kapunda, Meadows) and sensitively increase well designed density within towns.

c. Give nature a fairer site ratio in infill and new developments, for example, building envelope/ standards to prioritise urban canopy / greening targets.

Living Locally - what we want / need (some of the following is not related to land use planning)

Recent State Government policy has created mega schools versus smaller local schools, and we find it hard to link this policy with a Living Locally policy. We understand there are financial cost savings to government, but costs are passed onto households who are mostly required to drive their students to the mega school, which is not located locally. Access to local schools provides children and youth with opportunities for active transport to and from school, socialising with peers, and with some autonomy and honing of problem-solving skills. Safety en- route to and from school without relying on cars is paramount. Please see the article in *The Conversation* on 3 November 2023 referring to the violence caused by cars to children and the 'deadly norms' of car culture[1]. We must transition away from a car / road focus for our primary transport infrastructure and focus on active transport and living locally, together with convenient public transport.

Now that there is no longer a car industry in Adelaide, perhaps a role for state government is to educate people about the true social, environmental, economic, and cultural costs of car ownership, including travel times, road provision and safety. At the same time ensuring there is frequent, safe public transport, including integrated cross-town routes. Governments could also support the uptake in E-bikes with public charging stations, which could be a positive popular transport method, and remove cars from the roads and reduce emissions.

Our response:

1. Protect employment land along the South Road corridor at St Marys, Edwardstown, and Melrose Park (omitted from list on page 70 of the discussion paper). This is in consideration of the commercial and industrial land lost to the construction of South Road from Tonsley to Anzac Highway.
2. Permit only single garages to improve house design, provide better interface with the street, less hard surface and more opportunity for nature, less lost verges, and greater neighbourhood amenity.
3. Investigate local neighbourhood centres to redevelop for low scale, higher density dwellings near public transport and protected, safe active transport corridors throughout the suburbs (for example, Forbes Park'n'Ride, South Plympton, Bray Street, South Plympton).
4. Locate shared/autonomous vehicle parking spaces in all multi-unit developments.

Infill

How can infill development achieve an urban form that is consistent with the principles of Living Locally? What do you see as the benefits and potential drawbacks of infill development?

Figure 12, page 144 in the Discussion Paper highlights the uneven and inequitable burden the current planning policies are placing on infrastructure and communities not protected by heritage and/or character overlays. The suburbs to the East and directly South of the CBD are carefully planned, contain high order infrastructure and services as well as relatively large allotments, and are greener, safer, healthier, more prosperous, and better serviced than many. Cities and suburbs are in a continuous state of flux and the use of 'historic and character area' as a constraint to redevelopment, as shown on Figure 6 (p. 105), removes significant high amenity and serviced areas from small-scale infill and redevelopment.

When we are living in a declared state of climate emergency the 'preserving the established character' and limited redevelopment in the character and heritage policy areas contributes to reduced housing supply, diversity, and choice close to amenities, infrastructure, and the CBD. It also contributes to reproducing inequity across the metropolitan area when people are 'locked out' of opportunities by planning policy (both

[1] https://theconversation.com/our-children-are-victims-of-road-violence-we-need-to-talk-about-the-deadly-norms-of-car-use-214476

to live in the area and to redevelop properties). With sensitive and innovative urban design, and adaptive reuse of houses and amenities, the character could be enhanced, and increased social equity and wellbeing could become a reality. With innovative design, even the beautiful garden suburb Colonel Light Gardens could have a sensitive increase in dwellings with access via the back lanes.

The unstructured, uncoordinated redevelopment and small-scale infill that has occurred in the middle suburbs since the release of *The 30-Year Plan for Greater Adelaide* has resulted in one house knocked down and rebuilt (KDR) with townhouses, then a few months later the next house is KDR, and the process repeats on both sides of the street with little regard for the impacts on nature, community, and traffic.

While a good concept in theory, the corridor redevelopment along Anzac Highway and Churchill Road are examples of where large blocks have been subdivided and redeveloped one by one and are lost opportunities to maximise housing diversity and provide open space, shared infrastructure, and quality amenity. On a smaller scale within the suburbs of the City of Marion an example is presented below. Note the little remaining verge once double driveways are constructed for double garages that in many instances do not house cars (see bins in front of garage in Plate 2). How does the design of new houses where most of the front is used to house cars encourage car ownership?



Plate 1: New housing under construction – one side of street (City of Marion)



Plate 2: Recently built housing – opposite the development in Plate 1 (City of Marion)

Our response:

1. Equitable distribution of small-scale infill and identification of diverse housing opportunities throughout metropolitan Adelaide.
2. Bring landowners, community members, infrastructure providers, and governments together to structure plan neighbourhoods and mixed-use precincts (of various scales and combination of land uses) to assist the Living Locally concept and identify the characteristics valued by locals, the amenities required for future residents, the allotments to be redeveloped, open space provision, infrastructure innovation, etc.
3. Identify next generation strategic infill opportunities along corridors and structure plan, for example, Marion Road between Oaklands Road and Cross Roads has ageing commercial properties that could be amalgamated to provide mixed use, higher density housing options. Fragmented ownership can be overcome with innovative government policy.
    a. The interface of corridor development, regardless of heritage and character areas, must be of a scale and intensity that balances neighbourhood design.
4. Maximise permeable surfaces, for example all new driveways.

How will people live?

Some suburbs have experienced the outcome of the infill target of the *The 30-Year Plan for Greater Adelaide* which has not resulted in well-designed neighbourhoods with a true choice of affordable housing options. Metropolitan Adelaide has lost urban canopy and private open spaces without a commensurate increase in public open space throughout the suburbs. What the market often offers is large houses with three+ bedrooms and multiple living areas and garaging squeezed onto ever smaller allotments. The human population increases, and animal and insect habitat is lost.

The MLS fully supports infill and 'density done well', and the Living Locally concept and believe the elements may only occur with government involvement in structure planning in existing suburbs rather than 'leaving it to the market'. The future living arrangements are already beginning in the suburbs, and they include a mix of multi-generational living, co-housing, tiny houses, and shed conversions. Unstructured development could eventually see every street in Adelaide become, for example, a West Street, Ascot Park.

In the recent past greenfield growth (for example. Two Wells, Roseworthy, Concordia, Hackham, Mount Barker) was driven by developers who owned or had options over land on the urban fringe. In the future rezoning greenfield growth areas should be curtailed (the most sustainable and resilient town, or suburb, is the one not built). Some land needs to remain available for nature and future generations, and while infrastructure should be planned, the longer development can be constrained on greenfield areas, the more areas available for future development in an uncertain climate future.

Some people would like to live in quality smaller housing options that are well designed and pleasant places to live, walkable and close to public transport, with access to open space / communal garden areas, and shared spaces that allow them to stay connected in their local area when downsizing. This also helps to make their larger family properties available to others.

1. Structure planning and flexible zoning to encourage tiny houses and tiny houses on wheels throughout the Greater Adelaide Region
2. Encourage diversity of scale, density, affordability, and size of housing
3. Consider opening large public spaces to those at risk of homelessness, for example, there may be edges of golf courses as potential land for some high-density affordable housing (only requiring a small area)

What major infrastructure is needed and how will it be provided?

1. Co-ordinate and structure plan minor infill for sustainable urban design and to retrofit suburbia for Living Locally with neighbourhood scale infrastructure, for example, community energy systems, water sensitive urban design, community gardens, parking for autonomous and/or shared vehicles/bicycles, EV charging stations, community hubs and gardens, food forests.

The Commission and planning staff may like to look at the work of S Alexander and B Gleeson, 'Degrowth in the Suburbs: A Radical urban imaginary' and D Holmgren, 'Retrofitting Suburbia' for inspiration and innovative ways of urban planning and local living in a climate constrained future.

Thank you again for having the conversation about living locally in metropolitan Adelaide, we have one final point, we find the use of the term 'master' plan is both sexist and implies human 'mastery' over the urban and natural environment. The term 'structure plan' is considered more suitable as it is both gender neutral and ensures environmental features form the basic 'structure' and guide the design of an urban development.

We wish you well on the important task ahead, and welcome further opportunities to be involved.

Yours sincerely,

The Marion Living Smarties crew

Appendix 1

Love Our Local Trees campaign and event

Love Our Local trees campaign was developed by the Marion Living Smarties in response to the loss of suburban trees around us. It is a volunteer community project with support from Sustainable Communities SA and the Cities of Holdfast Bay and Marion.

We've all felt the loss of trees around us. Many of these trees have gone without us ever letting their owners know that we love their tree. We wanted to do something positive to show how many people care about trees in their local area. And to highlight and share the reasons we all connect and benefit from trees in our urban areas. **Connections to specific trees are tied to memories and experiences.** It was also used as an opportunity to thank others for the trees in their yards, through a short thank you note.

The project was open for any trees within the Cities of Holdfast Bay and Marion. The following 65 submissions were received June – October 2023. In addition, students at two local primary schools (Glenelg Primary and McAuley Community School) completed over 80 paintings of their favourite trees.

Stories and artwork were shared at a Nature Festival Event (October 2023). The Love Our Trees Celebration event by Cities of Marion, Holdfast Bay and the Marion Living Smarties saw over 100 community members gather to celebrate all things trees through nature craft, workshops, art, and storytelling.

Please enjoy the love stories ...

Table 1: Community love stories to trees

Name & Suburb	Why do you love this tree?
Josie, Hallett Cove	I love this tree because for 15 years I have been lucky enough to drive past this beautiful aged gum tree on my way home and always gaze admiringly at its majestic presence on Brighton Road at Brighton. I really love this tree and pray that it is never removed.
Jane, Seacombe Gardens	I love this gum tree in someone else's yard because of the amount of birds that live in the tree, the noises they make are a delight in the suburbs. It is beautiful and grand and would have been there for many years.
[redacted]	I love the tree in our back neighbours garden, because we can see it from our living room and backyard. It is really tall and reaches high up in the sky. And we see a lot of rainbow lorikeets in there. 🦜🙂🏡🌳
	There is a beautiful old cherry tree on our property and we call her 'the mother tree'. Cuttings from this tree have been used to grow hundreds of other trees locally over the years. Right now she is home to a hive of honey bees and provides wonderful share to picnic under in the summer. She was the first tree I sat under with my infant daughter after she was born and she has looked after us ever since.
	I love all trees. Into my garden I go to lose my mind and find my soul.
Heather, Edwardstown	I love these large old Gum trees still scattered around the suburbs in people's yards. They make me think about how the land once was. I watch them and the bird life they attract, from my kitchen window.

Jane, Warradale	I admire the stately gum standing resolutely on the corner of Oaklands Road and Morphett Road just outside of the Army Reserve fence. I wonder how old the tree is. Judging from its girth I would say it is quite ancient. I wonder how the hollow at the base of the tree came into being. I wonder what the tree has witnessed over its lifetime. I wonder if the drivers passing by realise what this majestic tree contributes to cooling the surrounding environment, to providing shelter for numerous creatures and producing life giving oxygen for all living creatures.
CJ, South Plympton	It's not native. It's 80 yrs & in the backyard of a house a few away. I love listening to the parrots screech & the magpies warble. Ivy snakes up its trunk & an old rubber tree intermingles with its branches. It breaks the azure sky with evergreen, cooling canopy. The house will be demolished & 80 years of nature will be stripped to bare ground. 3 new families will move into town houses. They won't know about the tree that was home & refuge to 100s of critters who were also raising their young & living good lives.
Simone, Hove	I love the native frangipani tree that grows in my back garden. Tall, slim, incredibly straight trunk, glossy green leaves. Its full glory appears in spring and summer with thick clusters of creme and yellow flowers wafting perfume in the air. No wonder honey eaters, rainbow lorikeets, bees galore visit it. When the flowers fall they make a beautiful carpet, a natural mulch. And this tree has never needed any pruning, watering or maintenance. So easy and beautiful. Perfection.
	My favourite tree was the Eucalyptus camaldulensis on Brighton Road that the Toyota dealership removed :(
	It's a very old, absolutely massive Moreton Bay fig tree. Looking up into its canopy makes me feel very tiny. It's like a whole universe.
Sam	The beautiful tree behind the Holdfast Bay Community Centre is one of my favourites. It's majestic and feels wide, and provides lovely shade for those enjoying the garden. Habitat hollows are starting to form, with birds a constant presence.
	My favourite tree is the grey box in my back yard. Huge. Bees, possums, koalas, rosellas. They all love the tree as much as I do. I'm so lucky.
Kate, Seacliff	I miss this beacon atop the zigzag path, it's shelter and the sound of the wind in it's leaves. It was not the prettiest tree, nor the biggest, but it defined a place in our local area and was much loved. (Casuarina at the top of the Seacliff zig zag)
Maureen, Seacliff Park	Gilbertson Gully is one of my favourite walking places, full of large native trees and bushes. It's full of birds and other wild life too. This big gum is just one of the magnificent trees I 'talk' to.
Ruby, Glengowrie	This huge, old ghost gum is so incredibly huge, and seems to be unfathomably old. It has a beautiful, smooth white trunk, and glossy leaves. Because it is down a quiet one way street, you get to be a bit more mindful, and feel the energy. It definitely has a spiritual feeling!

Jenny, Park Holme	I love how imposing this street tree is. Seemingly it's been protected because traffic conditions have been built around it. Don't see many trees this big anymore and I love that this has been saved by shaping the road around it.
[redacted]	I love this fig tree in someone else's front yard because it's so big and it sticks out on the footpath. When we walk past, we have a peek in, to see if there is a good fig to eat. The birds also like the delicious figs. 😋🦜
Tricia, Hove	The intricate puff ball flowers of this golden wattle in our garden are an integral part of our seasonal calendar, indicating the passing of the winter solstice, with the days soon to get longer and warmer. Yellow in nature brings joy to my soul and always makes me smile! It is a tree I gladly share with the rest of nature, the wildlife in the suburbs, my neighbours and passers by, the local school children. I love that it is a common tree with extraordinary qualities.
Debra, Hallett Cove	I am nominating a River Red Gum in Cormorant Drive Reserve Hallett Cove. I always stop and take in the beauty of this tree. This gum is so old and huge, that it appears to have its own ecosystem! It changes with the seasons; sometimes there are native birds nesting in the hollows, and other times it's buzzing with bees or covered in butterflies. After it rains, you can often hear tiny frogs croaking below. On a recent walk around the reserve with a Kaurna woman, she explained how important this tree is, and referred to it as an 'Elder'.
Michelle, North Brighton	An almond tree in my garden. Heralding spring early with eternal optimism, carpeting the grass with petals. Then giving us cool dappled shade throughout months of relentless heat. A frenzy of bees, rainbow lorikeets, butterflies & spiders call it home. At one point, a family of possums sheltered amongst the protective branches. Never once have we harvested any almonds, because they belong to nature. How fortunate we are to have been to have this old tree for our children, & their children to love, cherish & respect.
Michael, Park Holme	This magnificent old river red gum is on the corner of McInerney St and Sturt Road by the Flow of Life Mosaics. I love the thought of how long it's been there, the changes its been through and the habitat it has provided for wildlife over maybe 200 plus years.
Jo, Hawthorndene	A dead Eucalyptus viminalis in a roadside reserve. It is a remnant tree, and even dead, still provides habitat for nesting parrots in its hollows. It survived the most recent storm when many other trees around it were snapped off in extreme winds. It died during the millennial drought (2000s) around the time that many others died in the area. At the time, I asked Mitcham Council to leave this and the other dead trees along our road, rather than chop them down, and I am so glad they were agreeable to that. All are still standing almost 20 years later.

Mary, Hove	This small flowering gum provides wonderful shade for my garden, especially during hotter months of the year. Also, it provides a welcome habitat for several birds that regularly visit my garden, especially when the tree is in flower.
Greg, Glandore	This beautiful Magnolia tree is in someone else's front yard. When in flower it has a coverage of stunning pink. Provides a haven for birds, bees and butterflies. We should all think about planting a magnolia.
Nadja, North Brighton	This huge old eucalypt on Brighton Road, North Brighton provides so many services! It is a landmark for finding an important connecting street. It reaches out to shade and cool a hot, ugly road. Its roots provide a natural speed hump on the side street, warning motorists to slow down as they approach the bike lane on the main road. And that's without even considering the home and food it provides to so many different species - birds, insects, possums ... Sadly it lost one of its dear old friends just to the north earlier this year. May this tree have a long life and be celebrated.
Sue, Somerton Park	A Morten Bay Fig at Sacred Heart College. Love the wildlife this tree supports -so many different types of birds, bats and it's a great climbing tree for kids at the school where this tree is located. This tree is a refuge for me from the busyness of Brighton Road. The large trees provide shade, shelter and a windbreak as well as visual beauty and are essential for maintaining the balance for our respiration - by removing C02 from the atmosphere & replenishing O2. Trees are disappearing fast and need to be protected - the current laws aren't working.
Marian, Seaview Downs	The bottle brush tree in my garden is 50 years old and always has birds in it. They love the blossom, the red flowers are beautiful. It flowers twice a year. I also love the golden ash. It shades the house in the summer and lets light in during the winter. It sheds its leaves, but they make lovely mulch for the garden.
Hannah, Glengowrie	This Golden Elm at Partridge House, Glenelg is just magnificent. It has such a broad and beautiful canopy. I have spent many sunny mornings under this tree during my Pilates classes. It shelters from the sun and rain and provides a lovely shady habitat for understorey plants, as well as birds and insects
Jane, Glengowrie	I love this beautiful, old, majestic gum tree, which I see on my walks. I admire its longevity, as it's estimated to be about 350 years old and think of the changes it would have witnessed in it's lifetime. I always look for this 'landmark' tree as it's towering grace and beauty encapsulate me. I love it's a hotel to the wildlife. At different times, I've seen many different birds in it's canopy, a bee hive and a possum. Go take a look for yourself!
Jane, Glengowrie	I love this old eucalyptus camaldulensis on Oaklands Road, Somerton Park, because when I drive towards the beach I always look for it as to me it's a 'landmark' tree. I admire its beauty and that it's been standing for well over 200 years. I'm grateful for the shade it provides, the oxygen it produces, and how it captures carbon dioxide from the traffic fumes. It also provides nectar for the bees and birds and shelter for when it's raining.

Kinda, Seacliff	During spring, this big gum tree in Pine Gully would be covered by butterfly and bees. It is a house for coupe of rosellas. It protect the houses from the wind and stand still in the face of water erosion protecting all the soil around her. Sometimes, it looks like a gentle giant protecting the Gully.
	Set in a local park, my tree overlooks the nearby train line with its daily passage of trains to the city. I wonder how many of the passengers see my tree?
	My mother and father planted a cherry blossom tree for all my siblings when they got married, and my husband and I just got our own planted in Canada. So we always have roots in the ground where I feel 'home'!
	This tree looks amazing in the sun! The sun shines through the gaps in the branches. I love going for walks past this tree in the summer.
	The long leaves change from dark to light green as they flop up and down in the wind. Lots of branches everywhere for birds to make their home.
Child	I love all trees because they are nature and I love nature.
Angela, Mitchell Park	I love the Dwarf SA Blue gums that line the streets and the shade they provide when going for a walk. I used the Marion interactive tree app to find out the kind of gum tree. The parrots love the blue gums too, especially when they are in blossom.
CJ, South Plympton	The frangipani towers above my house and takes up 1/3 of the front yard, creating a cool climate in Summer. It was planted 25 years ago, not long after our young family moved into the house. It's my favourite flower and fragrance, and was planted by the love of my life so the perfume would waft into my bedroom on a hot Summer's night.
Lynda, Seacliff	I planted a fuchsia gum in my garden but it died when it was about 7 years old so I was glad to see this one thriving by the train line near Jetty Road Brighton. It is such a pretty small tree with beautiful flowers and lovely orange/ coral red gumnuts which are visible most of the year. The birds love it.
Sam, Marion	I love all the tall native trees in Marion, but this street tree is a favourite. It was planted by a resident more than 65 years ago now, and aside from providing shade, shelter, leaf litter and carbon capture in the urban environment, it also provides food and shelter for koalas. They are regular, if infrequent, visitors but always the same tree and will often revisit the same branch - sometimes with their babies. How lucky are we that someone thought to think ahead so we can continue to see koalas? Get planting everyone!
Ruth, Hove	The trees that edge the fence of Brighton Primary School are alive with deep pink gum blossoms. Lorikeets feast on the nectar. Their joyous calls are a delightful sound and their antics highly amusing to watch.
Tim, Seacliff	The almond tree in my garden is very old and has grown very large. It attracts lots of bird life and a resident possum. It also provides great shade in the summer.

Amelia, Glengowrie	I used play under this large oak tree at Oaklands Reserve as a little girl and collect fallen acorns and their 'hats'. I still love walking here with my Mum and sharing our love for trees and nature.
Anthea, Brighton	Once a month local residents meet under this tree in a small Seacliff park to share our excess garden produce. (Seacliff Community Produce Swap) The tree provides shade in summer and protects us from the winds in winter. It's always there to welcome us.
Jodie, Mitchell Park	A river red gum over 100 years old in a local park. Big large old trees = fabulous habitats like 'high-rise living' for wildlife. Foliage canopies of River Red Gums & eucalyptus are often 'tiered'. Please save our tallest trees- some creatures will only nest at a particular height. River Red Gum & other trees in Maldon Ave Reserve house beehives, cockatoos, parrots in hidey-holes. Despite age, storm damage + pruning, new growth emerges. This tree embodies/symbolises life force. Broken boughs left on ground = habitat. Enjoy colours, textures & scent of the wood at ground level. This tree has seen more changes than we ever will! An enduring landmark over the ages.
Gary, Oaklands Pk	This big gum along the road is hundreds of years old, and is not all grey. It has survived the Oaklands Road establishment decades ago. Contrasting strongly with the introduced deciduous trees that are failing habitat and ecological connection.
Maeve, Warradale	A big ancient gum in Oaklands Park Wetlands. I love the hollows where the cockatoos nest. I love the shade it casts. I love the markings on its trunk where Kaurna people of years past cut bark off it. I love thinking about how the area has changed since it's grown. I love the idea that it will outlive me and be appreciated by generations to come.
Jo, Warradale	I love seeing fruit trees on the streets. It's great to have Street food to share for people without gardens, and it reminds me of fruit trees that everyone on the street harvested in Plympton when I was little.
	My favourite tree is an English Oak Quercus robur. I read the Magic Faraway Tree as a kid and that tree was an English Oak and I have loved them ever since. So I became an Arborist.
	We love gumtrees.
Child	Trees provide air so they can help us breath. My favourite tree is a mulberry tree. Water the trees and give it sunlight so you can keep it nice when it's night.
[redacted]	It's a tree at SLPS in the front garden that everyone loves to climb on. I go there everyday at recess and lunch to climb up and sit in the tree and chat and play all the time.
Child	I like an orange tree because I can pick them off to eat the orange.
	My favourite tree is from 57 years ago. A large tree in which we built our cubby house. Different HSE rules then. We used to sleep in it 4m above ground.

Jess, Brighton	As a kid I climbed your strong long limbs and was hidden amongst your big cool leaves. I spied on passers by who walked down the lane while perched in your arms, Your figs were delicious and brought people to our door who wanted to share in your bounty. You are now gone but always with me.
	My favourite tree is the Morten Bay fig. Gracious, huge, shady, climbable, memories from childhood.
Nicola, Glenelg North	We love this Lilly Pilly tree at school because it provides us with fruit for cooking, a space to play under and a home for many little creatures. This year we have made jam, jelly and cordial from its fruit and had fun playing with leaves.
Jane, Glengowrie	It's the breathtaking beauty of this tall Magnolia trees', large, abundant flowers, in shades of pink and white. And as this tree flowers towards the end of winter, it signals the warmer months of spring are just around the corner. I also love that it's in a nursing home which brings the residents and visitors so much joy
Lynda, Seacliff	The spotted gum in my garden must be 6m tall by now with a lovely big crown of leaves and a beautiful pink, grey and white spotted trunk. I love to look up and see rainbow lorikeets moving around in the upper branches. It makes me feel small and yet provides a 3-dimensional scale to the garden. To think I planted this tree makes me happy.
Michelle, Marion	The old gums (really all the trees) round & in the Marion sport club carpark & grounds - big beautiful aged trees
Chris, Seaview Downs	This street tree is a native and ever green and shade producing
Sue, Seacliff	I had removed a very large, old peach tree and was wondering how to replace the shade when i noticed that a local bird must have dropped a solanum laciniatum seed in to that exact spot and a small shrub was growing. Now, it is 3 m tall, covered in berries for the birds and it attracts dozens of native blue-banded bees when flowering. It easily replaces the shade and many more plants are thriving in the part-shade underneath. I just love how I didn't have to do anything but now I have the perfect tree/shrub.
Troy, Glengowrie	The feijoa in my garden is an evergreen tree, with glossy green leaves. Twice a year, I enjoy shaping it into a large ball. It produces hundreds of white flowers with crimson centres which the lorikeets and parrots feast on. My step-daughter enjoys eating the sweet-tangy fruit. Most importantly, our cat loves climbing, hiding and playing a game of 'stick' in this tree.
Emmy, Glengowrie	It's the beautiful, colourful display of purple flowers which then become a purple carpet when they fall that makes me love the Jacaranda Street trees in Plympton Park. Not only is it their beauty but the excitement and joy they bring as they signal Christmas time is near. They form a beautiful canopy of green and are a good shade tree.

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Hi,

Please find attached a submission on the Greater Adelaide Regional Plan Discussion Paper from Master Builders SA.

Kind Regards

Kym Morgan
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SUBMISSION

5 November 2023



Response to Discussion Paper on the Greater Adelaide Regional Plan in South Australia

MASTER BUILDERS
SOUTH AUSTRALIA

MASTER BUILDERS SOUTH AUSTRALIA

Submission

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1. Introduction

This submission is made on behalf of Master Builders Association of South Australian Inc ("Master Builders SA"), established in 1884 as the peak body representing South Australia's building and construction industry.

Master Builders SA is committed to building a productive industry and a prosperous South Australian community and economy. As part of this, certainty within the planning system is a cornerstone to drive growth and balance the need for affordable and desirable housing, with appropriately zoned land for supporting these communities.

The South Australian building and construction industry directly employs more than 55,000 South Australians across all sectors, including residential, commercial, civil engineering, land development and building completion services. Indirectly, the industry supports tens of thousands more South Australian jobs.

The industry undertakes about $15 billion of work every year, contributing more than $1 for every $7 of economic activity within the State. Indirectly, more than one-quarter of South Australia's wealth is produced by the building and construction industry.

South Australia's building and construction industry is focused on the development and transfer of skills into a life-long career. Master Builders SA is proud of the industry it represents, the jobs it creates, the thousands of homes it builds and extends for families every year and the offices it has built for South Australian businesses.

2. Background, Industry Challenges and Priorities

The Commission has earmarked four priority outcomes to guide the discussion about how Greater Adelaide should grow. The ambitions are noble and equally challenging. The demand for more housing while at the same time seeking an urban forest creates natural conflict without a significant rethink of the development patterns that have characterised suburbia over the last 50 years, and especially infill in the last 20. The desire to remove cars from the roads while significantly increasing the population will also create tension. A significant investment in Adelaide's very poor public transport system is required to be an "enabler" for this to happen. A critical cog in this will be to look seriously at a sophisticated underground network of trains separated entirely from at grade traffic which are able to get people en masse across our vast 90 km long city rapidly and frequently.

If a city of 300'000 people can have an underground system (in Oslo) then it is not so far fetched to imagine this in Adelaide. But the planning must start now and the critical mass of people around the networks is required to generate the demand and drive the "per km" cost of such a network down through levies and taxes derived from a significant

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upscaling and intensifying of development around designated nodes. Setting aside land for any new spurs and stations should be happening now.

Above-ground dwellings will need to be a critical element to make more efficient use of land in the right places, and cater for the numbers of people expected in Greater Adelaide over the next 30 years. Zones need to be more flexible to enable this type of built form, and the term "apartment building" should be defined in the Code separate to residential flat building to cater for buildings containing dwellings located below or above other dwellings or non-residential uses, with more specific policy concessions in relation to this form of development.

One thing that is almost silent within the Discussion Paper is any mention of tourism and how important it is to foster this industry that generates billions into the State coffers thanks largely to our unique and world class wine and food regions, as well as natural environments all within 2 hours of Adelaide, mostly within the Greater Adelaide region. The building industry is heavily involved in the development of the tourism offerings, with some examples involving the work of our members being the recent expansion of Monarto, rebuilding of Southern Ocean lodge, numerous winery developments in McLaren Vale and the Barossa and many iconic features supporting and enhancing the visitor experience throughout Greater Adelaide.

Without a regulatory environment that is responsive and fosters tourism, the delivery of tourism assets can be thwarted by local agendas, and particularly when such developments are notified publicly. Tourism also provides opportunity for many South Australians to earn passive income through bed and breakfast accommodation and more active tourism activities that require buildings to be able to deliver.

Master Builders would like to see tourism being recognised as a big part of the future of SA's strong economy and State Planning Policies and GARP initiatives to drive this in an appropriate way. More tailored and appropriate tourism policy in the relevant Zones where most of Greater Adelaide's most treasured tourism assets are located will be important while also looking to policy that prevents excessive concentrations of purely "tourist" accommodation in particular areas in a manner that prevents access to rental properties for those in need.

The biggest challenge at the moment is that South Australia is in the midst of a housing crisis as the nation faces a rental affordability crisis. Adelaide, at 16 November 2022 had a rental vacancy rate of 0.3 percent, which is the lowest of the nation's capitals, according to research undertaken by the Australian Housing and Research Institute (AHURI).

Between the census of 2016 and 2021 the nation's population had risen by 8.6% but the number of households had increased by almost 12%, reflecting the trending occupancy

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towards higher numbers of single occupant households. This naturally corresponds to more housing being required for the same number of people, all things equal. There was a significant increase in marriage breakdowns during the pandemic.

Single parents often require two or three bedroom dwellings to accommodate their children in the time that they have with them so the increase in single occupant households does not directly correlate to a reduction in the size and change in typology of housing stock required.

Table: Population and household numbers, Australia 2016–2022

Australia	2016 Census	2021 Census	% change 2016-21
Population	23,401,881	25,422,789	8.6%
Households	8,286,078	9,275,212	11.9%
Rented dwellings	2,482,548	2,842,378	14.5%
All private dwellings	9,325,958	10,318,993	10.6%

Source: Australian Housing and Urban Research Institute

Since 2011, Greater Adelaide's population has only grown by 167,000, but that's projected to increase by 670,000 in the next 30 years. On top of that, the number of South Australians living alone is climbing: Single-person households are already up by 78 per cent since the 1990s, and that trend shows no signs of slowing.

Compounding the issue is that recent trends show the number of builds declining in the time since June 2021 as consumers become squeezed by lending institutions on the back of interest rate rises, inflation and tightening up of lending to be able to finance new builds. Meanwhile, the costs of construction remain excessively high.

It is noted that there is also an ageing population where there are greater numbers of more adaptive dwellings required and dwellings that require less maintenance to suit ageing in place, yet still embedded within communities that people are familiar with and have their networks.

Unfortunately, many of the established suburbs with high percentage of affluent aged populations are those lacking in suitable, diverse housing. Corridors around major transport nodes to allow higher density infill in a manner that protects the predominant character in the streets behind should be the cornerstone of delivery of more appropriate housing to suit ageing in place, while still retaining character areas behind "framed boulevards" of mixed use and high density living, providing all of the services and day to day needs of people within close proximity, and access to readily available transport links.

It is important to note the reduction in numbers of dwellings being built does not point

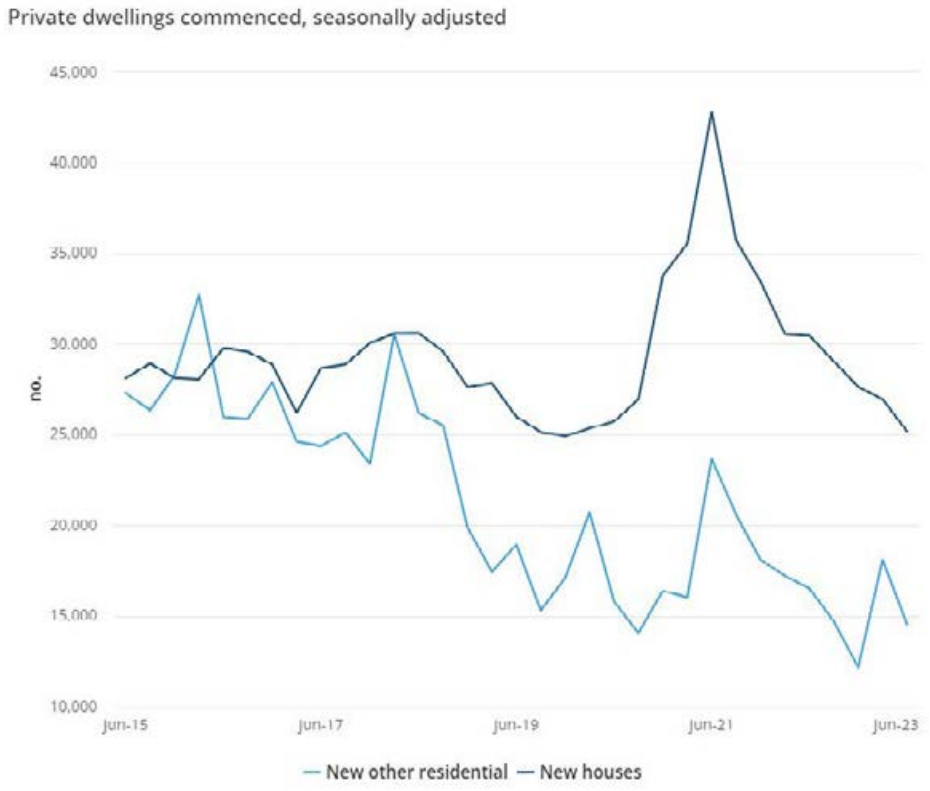
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purely to a demand side drop-off. There are macro-economic conditions that are having a dramatic effect on the delivery of housing.

The Government's projections for 300'000 new homes required in Greater Adelaide by 2050 are even quite modest, given 70'000 homes are required over the next 5 year period according to announcements made by the Malinauskas Government.

Many builders have been under significant financial stress on the back of fixed-price contracts that they have had to deliver (often at a loss) for contracts signed in 2020 and early 2021 before the substantial increases in labour and materials costs manifested. This has seen many quality, skilled people leave the industry altogether despite South Australia's comparatively low number of insolvencies.

A combination of the perfect storm of lower confidence in the building sector on the back of several high profile insolvencies, tightening of monetary policy, inflation, skills shortages and through the pandemic, materials shortages, the number of builds commenced in the last 2 years has plummeted from the lofty heights of June 2021 during the peak of the housing stimulus. The stark reality is shown in ABS data below:



Australian Bureau of Statistics Private Dwellings Commenced Graph, 2023

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Meanwhile the demand for housing continues to increase and there is expected to be a significant increase in international migration to Australia over the next 5 years. In essence we now have less builders to build more homes, and fiscal policy that is stifling the financial delivery of homes to market.

We also have a licensing system that has been overly restrictive in the last 5 years in terms of facilitating more registered site supervisors to enter the system, and a regulatory environment in which Regulatory Impact Statements are either skewed or ignored to push specific policy agendas (such as the Australian Building Codes Board's agenda to drive 'livable housing' in the midst of a housing crisis and despite the CRIS which highlighted significant costs and risks), pushing up the cost of building.

This 300'000 target assumes that if the 70'000 (i.e. 14000 homes per year) in the next 5 years is met, there would only be 230'000 homes constructed in Greater Adelaide between 2028 and 2050 (22 years), or just over 10'000 homes per year. If SA contributes to the national Housing Accord target on a per capita basis that number increases to 16750 homes per year required through the state over the next 5 years.

Such an assumption is based on the rate of population growth to continue at the present rate or taper off slightly and international immigration to typically favour eastern seaboard capitals, as has been the trend for the last 20 years. SA is going to be the defence hub of the nation with the national commitment to AUKUS and building submarines at Outer Harbour.

A major defence infrastructure commitment is already planned and highly skilled jobs relating to defence are set to be one of the pillars of the South Australian economy over the foreseeable future. At present land is still comparatively affordable to the eastern seaboard capitals, and given the strong economic forecasts and persistently low jobless rate in SA at present, it should not be assumed that Adelaide's migration will not keep pace with, or even overtake trends observed in some eastern states cities.

If the modelling projections are understated, there is likely to be ongoing housing affordability issues as more people contend for housing in a market where demand is substantially outpacing the supply.

At the same time that skills for building are badly in need, there will be a pull from defence, as has been from mining during the boom times, for skilled trades to move to highly paid jobs in defence, where they are not having to deal with daily battles with clients and managing a challenging regulatory environment in the building industry.

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The Greater Adelaide Regional Plan is just one piece in a complex puzzle, but an important piece nonetheless. It can provide the policy setting for more housing, and particularly more diverse housing in the right locations, stimulate business with more agile zoning, provide a policy setting for the housing for workers in employment locations, and be a critical lever to build on the foundations of Greater Adelaide as a world-class tourism destination and drive a more resilient and less car-reliant community by changing the way development patterns evolve to address the less centralised and travel-dependent ways that many are now undertaking work.

It can also set the scene for a Planning and Design Code (the "Code) and South Australian Planning and Property Atlas (SAPPA) that delivers spatially mapped rules and exemptions (such as those likely to emanate from the SA variations and transitional arrangements to the National Construction Code) and place SA in a unique position where the location-specific building rules variations are easily identifiable before substantial commitment is made to design of houses or even settlement patterns of land divisions.

There is only so much the planning system can do in relation to the macro-economic challenges, but it can stimulate an industry response to the shortage of housing by making more land developable for a range of things that support an agile and responsive housing industry.

Perpetual trade shortages are expected for some time with global competition for skilled people. Modular and off-site building methods are expected to significantly grow in the wake of this, and an opportunity exists for SA to take a lead in this, tying in with its smarter, regenerative future ambitions and circular economy targets. Off-site building creates far less waste and what is created can be readily separated and recycled.

The future circular economy requires land zoned appropriately for provision of fabrication and warehousing, resource recovery as well as distribution, conveniently positioned close to major transport routes and sufficiently separated from sensitive receivers. Finding the land where there are not interface issues and there is capacity for growth is pivotal to this plan, and it is considered that the target areas for future employment growth should be expanded, and furthermore, the more polluting industries make way for innovative technology and circular economy based industries.

Affordable and More Diverse Housing

The delivery of affordable housing has largely been reliant on NGOs over the past 20 years or so as the South Australian Housing Trust has taken a step back from being a "builder" of affordable and social housing.

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Unfortunately, major opportunities to deliver affordable housing in the most efficient manner have been missed due to inflexible policy settings and lack of incentives for the private sector to deliver to the demand required.

Victoria recently launched a bold campaign to assign greater powers in the State in relation to developments comprising $50 Million in Melbourne or $15M in the regional areas involving affordable housing, citing excessive delays at local government and a high number of cases being brought to the Victorian Civil and Administrative Appeals Tribunal (VCAT) due to reluctance of authorities to issue decisions.

SA already has policy for certain types of development over specific monetary values (e.g. anything over $10M in Adelaide CBD) where the State Planning Commission assumes role as decision maker. While call in powers are useful for certain types of development over specific value, and usually location or Council specific, it is contended that there needs to be more agile decision making at the policy setting to drive an environment conducive to delivery of affordable housing and other more diverse, higher density infill in suitable locations.

It may be incumbent on Government to take the reins as developer for supply of affordable housing, and particularly affordable rental stock or commit to joint venture projects with major community housing providers where smaller sections of the private market are unable to deliver en masse.

SAHT should actually have a team of dedicated planners whose sole task is to generate a pipeline of land available for affordable housing within established areas and work with the private sector to make this happen. Compulsory acquisition powers exist to enable large tracts of land to be purchased to assist with the delivery of affordable housing where land holding is tight but there is a significant shortage of supply. The powers are used for land acquisition in relation to road projects but very rarely for other purposes.

Addressing the significant shortfall of social and affordable housing starts with the planning system allowing for greater "call in" powers for Government to side-step local Government politics to be able to achieve State-based goals on affordable housing.

Furthermore, and referred to later in this submission, a re-invigoration of the Planning and Design Code's affordable housing policy is desperately needed.

Trends in where people want to live need to be interrogated to ascertain whether previous patterns match the demands of today. AHURI points out the need for more affordable rental housing in close proximity to major employment centres due to a shortage of 173000 private affordable rental properties nationally, with 71% of low-income

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households paying what is considered to be unaffordable rent (i.e. more than 30% of the household income).

Catering for the "Missing Middle" housing required

The "missing middle" has been described by the Malinauskas Government as critical to address housing diversity required to cope with the increasing single occupancy households and ageing population of SA. A magnifying glass needs to be put over the middle and inner ring Councils that have adopted suitable housing policy to seek to address this issue, and more fundamentally those that have not. Councils that have been reluctant to adopt meaningful change to their infill policy should be given a specific timeframe to come up with a code amendment to drive affordable and diverse housing, or face the powers being stripped of them by State Government, and have SPC undertake the work on their behalf.

There are large tracts of suburban Adelaide blanketed by Zones that do not adequately facilitate and generate development of higher density, multi-unit housing options. Many of these areas are "post-war" suburbs where the character is not strong or consistent, yet these areas are often conveniently located, close to shops, health services, transport and public open space. Some areas have significantly outdated infill policy with detached dwelling site area minimums as high as 500m^2 and frontage requirements of 15m for such stock, within 8km of the Adelaide CBD.

Even within areas where piecemeal infill is potentially unsuitable due to topography or other environmental factors, larger and consolidated sites offer great opportunity to provide higher density infill while limiting site coverage and providing spatial separation to adjacent established dwellings.

However, at present there is little policy imputes to drive innovation, affordable housing and higher density mixed use development on larger development sites in Zones such as General Neighbourhood and Suburban Neighbourhood Zone, or even in suitable parts of the Hills Neighbourhood Zone.

Major development sites are critically important to be able to fill this void and cater for the "missing middle" as there is much greater capacity and the value equation for delivery of such housing becomes more profitable.

Reinventing the Code to drive the GARP Agenda

It is considered that the hierarchy of the Planning and Design Code needs to adequately

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reflect the State Planning Policies (SPPs). There is not enough of a policy link between the "motherhood" SPP policies and the "day to day" provisions applied by authorities, application by application. A number of recent Court judgements expose concerning flaws in the Code and Environment, Resources and Development Court Commissioners have been left baffled by some of the problematic wording in some policies, with a number of scathing judgments over the last 18 months that should be taken into account when re-writing policy.

In Development Plans of yesteryear, there were a suite of "State wide" policies that applied at the front a "pre-BDP format" Development Plan, which gave meaning to the remaining policy within the Plan in a State context.

That is, they could inform the relevance of the more granular policy beneath. They drew themes from the planning strategy but set the tone for how policy within the balance of the Development Plan could be applied.

The hierarchy of the Code places Overlays at the top, Zones, then Subzones and finally general policies, which are not spatially applied. While stripping back of regulation is generally a good thing, the Code has been so stripped of much of the "policy setting" that the Performance Outcomes should be guided by, that we have seen some very strange deliberations of what is meant by the Code in the Environment, Resources and Development (ERD) Court and Supreme Courts to date. A series of State-wide Desired Outcomes should be provided in the Planning and Design Code that draw a link between the State Planning policies (which themselves cannot be used in the assessment of an application) and the other provisions in the Code.

Constant reviews of the Code in the context of case law as it evolves are required. It was only last week, in the matter of *Geber Superannuation Pty Ltd v Barossa Valley Council Assessment Panel* where the CAP decision to grant consent for tourist accommodation and a function centre in the Rural Zone was overturned on judicial review grounds for apparently failing to consider the development "seriously at variance" to the Code.

Tourist accommodation is a specifically envisaged use in the Rural Zone and function centres are critical to the tourism economy, including providing venues for weddings and other celebrations for which there is a high demand in many of SA's tourism drawcard locations, such as Barossa and McLaren Vale, that happen to have a lot of land within the Rural Zone.

The Supreme Court's decision just shows exactly how out of touch some of these so-called experts are with reality, with little consideration of the wide-ranging implications of such decisions on what are quite common types of development expected in the Rural Zone. Requiring ANY development in a Rural Zone to be connected to primary production

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somehow (as the judgement in Geber appears to read) is idealistic and lacks consideration of what the authors of the Code intended by suggesting "value adding" enterprise within the Zone. The total disregard of such a decision to the fact that so much of the Rural Zone is made up of land that is not viable for primary production defies belief.

Nevertheless, we have a very unfortunate judgment against a Council Assessment Panel decision that would likely have been sound based on established planning principles. It is now up to the Government to re-write the Rural Zone to ensure that such a judgement can never happen again. Rural Zones, among other things, accommodate significant tourism development, allied industry, recreation facilities, renewable energy facilities and things that are not generally suitable in any other zones, such as shooting ranges.

The Greater Adelaide Regional Plan should not just be about ensuring there is adequately zoned land for future growth and our changing economy. The tools to deliver the GARP aspirations need to be sound. A review of the Planning and Design Code in many areas is desperately needed as part of the implementation of GARP.

One of the more problematic obstructions to more strategic and targeted infill is the lack of incentive for amalgamation of sites to enable infill that better responds to its locality. Having larger development sites can allow for apartment developments, which are able to consume less space while fitting more dwellings, and maintain sufficient curtilage to allow for reasonable tree planting and offsets from neighbouring properties. Larger development sites can allow for a reduced number of driveways that remove on-street parking and create conflict with verge features.

The next section of this discussion will focus on changes to the Planning and Design Code that can be readily made to improve the quality and range of infill development, providing financial incentives for developers while also allowing for development that responds suitably to local context with appropriate orientation, tree planting, access, scaling down towards boundaries shared with development outside of the development site, use of renewables and providing for grouped e-charging stations and other facilities for environmentally sensitive design.

"Catalyst" and "Masterplanned Catalyst" sites

As mentioned earlier there are many very large sites in metropolitan Adelaide within neighbourhood type zones that are appropriate for a more compact and diverse form of infill development than the quantitative criteria in the Designated Performance Features of the Code provisions envisage. While meeting DPFs is not mandatory for achieving the performance outcomes there are still many Council planning authorities that apply significant weight on these, in particular in relation to building height and site area. Therefore, some more specific policy to facilitate more compact and diverse urban form

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on larger development sites would be helpful as these sites offer the best opportunities for the most orderly form of infill development.

One potential solution is to define "Catalyst" and "Masterplanned Catalyst" sites and provide a Desired Outcome in each of the Neighbourhood Zones (excluding Rural Living and Rural Neighbourhood) that identifies catalyst sites as important to realise the State-wide planning goals of a more diverse, inclusive community that provides a variety of housing to meet the needs of all people, with housing that may be quite different to what the Zone generally envisages for piecemeal infill development.

Many of Adelaide's post-war suburbs are comprised of allotments of between 600 and 800 square metres (m^2) and frontages between 15m and 20m where remnant allotment patterns remain. Combining two such allotments or more for development can materially improve the functional aspects of redeveloping a site for infill development and therefore some concessions on building height, frontage and site area could help these sites better cater for the "missing middle" varying building typologies desired by the Government.

It is therefore suggested to insert the following definitions into Part 7 of the Planning and Design Code:

Catalyst site: means any development *site* within a development application for infill development (whether or not there is more than one existing land parcel) that includes wholly or predominantly dwellings that is not less than 1400m^2 and having a single road frontage of at least 25 metres or where multiple road frontages are provided, at least one road frontage of 20 metres and is within 400 metres of any of the following:

- a high frequency transit route,
- public open space greater than 2000 square metres
- an Activity Centre

Masterplanned Catalyst site: means *site* within a development application to be assessed by the State Planning Commission, for infill development (whether or not there is more than one existing land parcel) that is not less than 5000m^2 and having a single road frontage of at least 40 metres or where multiple road frontages are provided, at least one road frontage of 30 metres and is within 1 kilometre of any of the following:

- The City of Adelaide Local Government Area, an Urban Activity Centre, Urban Corridor (Main Street) or Suburban Activity Centre Zone
- a high frequency transit route,
- public open space greater than 5000 square metres

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Specific policy could be provided for sites containing heritage places or within the historic area overlay being excluded from being able to be assessed via the Masterplanned Catalyst site assessment pathway.

Assessment Path for Masterplanned Catalyst site application:

An assessment pathway for Masterplanned Catalyst sites should be provided whereby any application comprising a Masterplanned Catalyst site is assessed by the State Planning Commission and involves a combined application for built form and the division of land, and must be assessed in a similar manner to the previous non-complying development stream, where a Statement of Support is provided by the applicant with a "concept plan" to support the application proceeding down this pathway.

This would require a change to the Planning, Development & Infrastructure Regulations and a Practice Direction for the administrative process to assist prospective applicants.

The applicant should demonstrate in the first instance how the proposal will respond to State planning policies and take into account the locality specific considerations that support the need for a more compact and diverse urban form than otherwise contemplated in the relevant Zone and demonstrate a minimum of 15% affordable housing being provided but incentivise greater than this with policy concessions.

The purpose of the Masterplanned Catalyst site related path (as opposed to Catalyst site) could be to provide more specific policy that places greater importance placed on high quality design and planning outcomes, while also allowing the greatest level of variation from numerical minimums in the relevant Technical and Numeric Variations in a particular zone and area.

In instances where the application is not deemed to meet the criteria for the relevant assessment pathway to be able to be assessed by the Commission, the applicant should be given the opportunity via a redirection at the verification stage to a relevant authority (Council Assessment Manager for example) for assessment as a catalyst site development. This could theoretically work in a similar manner to how an authority that is selected incorrectly in the Portal can direct the application to the correct authority.

A sliding scale on the concessions for site area and building height could be provided for policy in relation to Masterplanned Catalyst sites that enables greater concessions if there are more environmentally sustainable and socially responsible design and planning measures adopted but allow greater flexibility with regard to quantitative provisions. This

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will promote things similar to the "Nightingale" developments that have evolved in Melbourne (car-free apartment developments with high affordable housing provision).

Because of the emphasis on design quality, a design review process in the Commission of sorts should be provided as part of the process, after the Statement of Support has been accepted and the application proceeds as a Masterplanned Catalyst site assessment with the suite of plans required for lodgement.

It is suggested that Catalyst Site policy is introduced in the "Design in Urban Areas" module specifically identifying the need for appropriate orientation, incentives for "above ground" dwellings, minimising the number of access points to existing roads, and providing canopy trees that balance the effect of taller buildings and provide visual softening and separation between higher buildings and established adjacent dwellings.

Assessment for a Catalyst site application:

It is suggested that if the Commission does not proceed with the application for a Masterplanned Catalyst site, it assigns the application to the relevant authority (relevant Council) in which the land is located and the site is taken to be then a 'catalyst site'.

The following performance outcomes should be inserted into the General Neighbourhood, Suburban Neighbourhood, Housing Diversity Neighbourhood, Waterfront Neighbourhood, Hills Neighbourhood (except where located within a Medium or High Bushfire Hazard Overlay area),

PO 1.3

Residential and mixed-use development comprising predominantly dwellings on catalyst sites providing a greater mix of housing close to open space, public transport, activity centres and community facilities to enhance community access to services and increase affordable housing.

DTS/DPF 1.3

Medium and higher density residential development than located where any one of the following is satisfied:

a) *within 400m of an activity centre*
b) *within 400m of a high frequency public transit service*
c) *adjoining public open space greater than 2000m² (including where the site would adjoin if not separated by a public road)*

PO 3.1

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Other than development on catalyst sites, in which case built form may be higher than nearby buildings but scaled down within 6 metres of development site boundaries shared with adjoining properties, building height is consistent with the form expressed in any relevant Maximum Building Height (Levels) Technical and Numeric Variation layer *and* Maximum Building Height (Metres) Technical and Numeric Variation layer *or is generally low rise, or complements the height of nearby buildings.*

DTS/DPF 3.1

Building height (excluding garages, carports and outbuildings) is no greater than:

a) the following:

Maximum Building Height (Metres)
Maximum building height is XXXm
Maximum Building Height (Levels)
Maximum building height is XXX levels

b) in all other cases (i.e. there are blank fields for both maximum building height (metres) and maximum building height (levels)) - 2 building levels up to a maximum height of 9m or in the case of a catalyst site, 3 building levels and maximum height of 12m.

In relation to DTS/DPF 3.1, in instances where:

1. *more than one value is returned in the same field, refer to the* Maximum Building Height (Levels) Technical and Numeric Variation *layer or* Maximum Building Height (Meters) Technical and Numeric Variation *layer in the SA planning database to determine the applicable value relevant to the site of the proposed development*
2. *only one value is returned for DTS/DPF 3.1(a) (i.e. there is one blank field), then the relevant height in metres or building levels applies with no criteria for the other.*
3. *The development occurs on a catalyst site, the maximum stated in part (a) can be increased by one building level or by 3 metres, whichever applies, or in the case where part (b) applies, 3 building levels and a maximum height of 12m, with development above the heights stated in part (a) or part (b) not within 5 metres of the side and rear boundaries of the development site, or 6 metres in the case of a southern boundary.*

Policy should be provided with specific difference between Masterplanned catalyst sites and catalyst sites to highlight the greater number of features able to be incorporated into larger development sites, and the greater concessions to TNVs applicable.

A masterplanned catalyst site should not have a stated minimum site area with the designated performance feature, but mandate a minimum diversity target of not less than 2 different categories of dwellings and not less than 15 percent affordable housing and incentives for other types of housing, including universal housing.

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3. Master Builders 10 Point Plan to assist drive GARP

- Expand the area of the "Greater Adelaide" regional plan to include areas north of Murray Bridge to include the southern part of the Mid Murray Council region in considering future population projections, major freight routes and employment centres, as well as areas within the Barossa Valley Character Preservation District within the DC Mid Murray region, given their close proximity to Angaston.

- Investigate opportunities to relocate major "dirty" industries outside of Adelaide's metropolitan areas close to urban populations, to free up land for more boutique, technology-based industry and commercial developments, and open up more land for urban residential development and infill currently precluded by separation distances required for certain industries. For example, Adelaide Brighton Cement to be moved from the Le Fevre Peninsula and a review of the former Restricted Residential Zone in Osborne being made.

- Abandon wasted millions in improvements and build a business case for moving the Yatala Labour prison and Womens' prison and creating land for over 5000 new homes in the areas north of Grand Junction Road below Dry Creek. This may involve a significant expansion of existing facilities at Mobilong, Mount Gambier and Port Augusta, which could be used as a mechanism to drive greater employment in key regional towns of SA.

- Investigate areas currently within the Environment Food Production Areas that could be suitable to accommodate future urban development, particularly in areas where floodplain improvements are earmarked to reduce flood risk, and where settlement patterns and soil typology are not conducive to viable horticulture. Around Lewiston is one example, with the Gawler River Floodplain mitigation project in the pipeline.

- Review post-war suburbs for future infill opportunities, and particularly where there is "legacy" policy that has been carried over from outdated Development Plans, e.g. within the former "Central Plains Policy Area" of the City of Mitcham (in particular Melrose Park, Daw Park, Pasadena, Clapham, Panorama, St Marys where minimum allotment sizes in many parts for detached dwellings are as high as 500m^2 preventing infill).

- Develop Tonsley, the Flinders precinct and surrounding lands surplus from the South Road tunnels project as a world-class education and training precinct and re-invigorate surrounding suburbs with innovative and affordable housing solutions to house student and worker populations close to these key activity generators. A masterplan for St Marys as well as Clovelly Park to provide green linkages to improve pedestrian and cycle permeability, active travel and support this with mixed use and higher density housing around these green corridors would enable better connectivity to the Tonsley and Flinders precinct, improved amenity and targeted growth.

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- Consider stronger regional townships at the edges of the GARP (Murray Bridge, Victor Harbor, Goolwa, Normanville/Yankalilla, Kapunda, Roseworthy) to be part of the solution to decentralise growth around Adelaide. This needs to be supported with improved transport linkages, (duplication of Victor Harbor Road and provision for train extension from Seaford to other southern destinations) and masterplanned land for all forms of development including the expansion of employment opportunities for each region, provision for health and education facilities and suitable land allocated for urban development as well as lifestyle allotments (hobby farms) which are in demand on the Fleurieu Peninsula. Areas in the elevated areas above Normanville and Yankalilla in the Rural Zone currently containing allotments of around 2 hectares could be moved into a Rural Neighbourhood or Hills Neighbourhood Zone with Technical and Numeric Variations for site areas and frontages to deliver more available lifestyle allotments, while flatter areas between Yankalilla and Normanville and Normanville and Carrickalinga investigated for future Township expansion including land for commercial type development behind the service station on the Main South Rd between Yankalilla and Normanville.

- Enhance Adelaide and surrounds as a tourism destination by enabling productive industry to capitalise on its existing assets and diversify with complementary visitor experience development. A holistic review of the Hills Face Zone needs to be considered as part of this, as the limitation on single storey development in the Zone places substantial restrictions on many sites suitable to provide more tourist accommodation and other tourism-oriented development. The boundaries of the HFZ and the policies in the Zone need to be re-imagined for contemporary conditions, and be cognisant of the growth of Adelaide into many areas around the Zone. The Zone was introduced in 1961 and has largely gone unchanged since then. There are many properties not visible to the Adelaide Plains that are within the Zone and have excessive restrictions placed on them.

- Create or enhance urban "high streets" with mixed use and higher density together with more diverse residential development framing road corridors, with a graded approach to allow for the gradual reduction in height down into adjacent suburban areas from some arterial roads (not freight based routes). Higher quality medium density apartment stock is required within suburbs but close to health and retail precincts to allow for ageing in place, which could be located within allotments immediately behind higher intensity mixed use urban boulevards before character is returned to more traditional suburban residential lower density development. Key roads that could accommodate such development include the Parade, east of Portrush Rd, Magill Road, Payneham Road, Greenhill Road, Unley Road, Goodwood Road, Henley Beach Road, Sir Donald Bradman Drive and Port Road, following the examples of Churchill Rd and Prospect Road.

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- Re-invigorate the Planning and Design Code to iron out clumsy policy that provides obstacles to appropriate development in many circumstances, e.g. address the fact the Emerging Activity Subzone is superimposed over whole Masterplanned neighbourhoods and this subzone only envisages residential above non-residential development, despite many settlements already being planned and already shovel ready for detached housing; provide opportunity for greater intensity development embedded in Zones currently not envisaging this, where there are larger and consolidated allotments to work with (e.g. having a reduced site area, and increased height/no of storeys for allotments greater than 1200m^2 within 400m of high frequency public transport, open space and activity centres, and further concessions on allotments greater than 2000m^2 with minimum frontages to allow orderly medium density development in the General Neighbourhood Zone), and concessions specific to corner allotments, recognising the greater opportunity two street frontages provides to provide suitable terrace dwellings at higher density.

The following provides specific responses to the ideas for GARP in relation to State Planning Policies.

4. Housing Affordability / Increase Housing Supply & Diversity of Housing

Related State Planning Policies (SPP)	Would could the planning system do	Ideas for GARP
SPP 6 – Housing Supply and Diversity	Identify housing opportunities that support economic viability of strategic centres	Identify regeneration and strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza and Elizabeth

Master Builders Comments:

This is generally supported but there needs to be a focus beyond just proximity to major urban centres for strategic regeneration and infill. Providing policy for higher density and mixed use corridor developments, as seen in Churchill Road and Prospect Road, to follow other major urban transport routes such as Unley Road, Goodwood Road and Fullarton Road to the south, Magill Road, The Parade, and Greenhill Road to the east, and Henley Beach Road, Sir Donald Bradman Drive and Port Road to the west; is a major lever to lower dependence on personal vehicle travel and allow for suburban areas in higher amenity inner to middle ring areas, currently overlaid by Heritage and Character Overlays, to remain largely protected and provide the canopy that is required for climate resilience and reduced urban heat island.

Incentivising greening of rooftops and facades through policy mechanisms to improve economic outcomes for developments would assist with multi-residential options being able to also contribute to heat island reduction. More efficient use of land can be

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achieved with greater apartment development, increasing the number of dwellings on land while maintaining curtilage for landscaping and setbacks from more established areas behind.

The more compact corridor development model for development along key transport routes could allow for greater public transport uptake, particularly if there is a reduced allowance of car parking provision in multi-residential apartment complexes. A critical mass of people on key north-south and east-west boulevards could provide the necessary business case for future mass rapid transport along these corridors, including underground trains that sit beneath these road corridors.

There is, however, a lack of three-bedroom apartment stock within Adelaide and the key driver for downsizing is not necessarily a reduction in the floor area of a place for empty nesters a lot of the time, but reduced demands on maintenance through reduction in land and a "lock it and leave" capacity for those spending much of their retirement travelling. Higher quality, premium apartment stock should be encouraged in the inner ring areas to allow for an ageing in place, thereby freeing up detached housing stock for families and those more in need and able to maintain larger properties. Planning incentives to provide the stock combined with tax incentives to reduce the penalty to those seeking to downsize, are needed.

Providing apartment stock with car share schemes embedded into the land and personal vehicle ownership restrictions by land management agreements or community schemes could be a way to encourage greater numbers of dwellings within development parcels, with reduction in space consumed by car parking.

More affordable housing stock should also be co-located close to public transport for ease of connectivity between services, transport and those that are least able to afford personal vehicular transport costs. As has been highlighted in Master Builders' previous submission regarding review of the planning system, there are many areas within the middle and inner ring suburbs of Adelaide currently not within the Affordable Housing Overlay (which provides concessions to developers seeking to construct affordable housing, on site areas for example). This anomaly must be rectified if the Government is serious about addressing the dire shortage of affordable housing.

An area that has been overlooked in the discussion paper for future expansion of housing is the Yatala precinct, current home to the Yatala Labour Prison and Women's Prison.

There is space for over 5000 homes in this area, within Northfield and south of Walkley Heights, if there is a longer term plan to move correctional facilities to the outskirts of Adelaide's northern suburbs where space is more plentiful and land is cheaper, or expand existing facilities in Mobilong, Mount Gambier, Cadell and Port Augusta, for example.

The other major opportunity for future housing in inner-middle ring Adelaide where there is an untapped opportunity to accommodate a significant increase in number and

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diversity of dwellings is in the areas around the Tonsley Innovation district. While City of Marion was proactive in recognising this with appropriate rezoning of nearby areas to encourage a range of dwelling types at greater density, the same cannot be said for City of Mitcham, which reneged on original plans in allocating St Marys into the General Neighbourhood Zone during the Code implementation.

TONSLEY – A WORLD CLASS EDUCATION AND INNOVATION PRECINCT?

With Smart Technology and Circular Economy transition including robotics and artificial intelligence driving a modern renaissance in manufacturing we are likely to see a significant shift in building with off-site and modular type construction. This is already being fast tracked due to the dwindling labour supply for on-site trades. It will be important that appropriate land is reserved to train people in these fields and house people close to these precincts.

The Government's Technical College to be established at Tonsley to be opened in 2025 combined with the already established Flinders Tonsley precinct provides the backbone for this area to be a world-leading technology and learning hub, which could spawn many new-tech start-ups in the surrounding land if this is made available for and zoned appropriately to accommodate. Furthermore, leftover land from the South Road tunnels land acquisition could provide the opportunities for linkages to nearby residential areas and specific areas for smaller businesses to establish along the arterial corridor in between open space, entertainment and café strips.

The post war suburbs in the locality of the precinct are ripe for renewal and could accommodate a significant up-zoning to allow higher density close to the South Road corridor with ground level commercial uses, and support a ready catchment of students in addition to a workforce for the Tonsley precinct.

In the areas leading towards the road tunnels to be established it would be an ideal opportunity to provide grade separated pedestrian and cycling linkages from the eastern side to the western side of South Road. Inspiration can be drawn from the network of subterranean activity in cities like Singapore, or the "Highline" of New York.

Creating such a link opens the door for a rethink of St Marys and Pasadena, which are post-war suburbs at the south-western corner of the City of Mitcham flanking the Tonsley precinct to the east. This area has a network of reserves and linkages through drainage easements and a higher percentage of open space than adjacent suburbs of Daw Park and Clovelly Park. Many of these linkages and reserves are under-utilised and need attention, but could form the backbone of a regenerative suburban approach with higher density and diverse housing supporting the viability of these networks, improving passive and active recreation and fostering connections between the Pasadena Shopping complex and Tonsley Education and Innovation precinct together with public transport links on Cashel Street, Goodwood Road and South Road.

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While much of the infill to date within this area is derived from traditional "one into two" land divisions, there are a large number of allotments that are in excess of 800 square metres (m^2) where more compact and diverse housing typologies could be accommodated, and a more "planned" approach through consolidating allotments into wider or larger development sites could be embedded in policy with the appropriate mechanisms that also support urban canopy contribution and stormwater management in a sustainable way.

Traditional zoning, which still informs the Planning and Design Code is based largely on "site areas" per dwelling, whereas a maximum footprint of built form (plot ratios) without a site area minimum would allow for more creative housing solutions that also balance with green and liveable suburbs.

UTOPIAN ZONES OF MIXED USE DEVELOPMENT – STIFLING HOUSING SUPPLY?

Another way to free up land for housing is to take a holistic view at some of the local agendas of Councils in their sometimes unrealistic strategic ambitions for land. There are many Councils that seem to think they are strategically important for provision of innovative mixed use development precincts where there is really limited market demand for such in certain areas. This especially applies in the southern and northern fringe suburban areas of Adelaide.

While there is no doubt a need for innovative mixed use development in many areas, the application of certain zones to cover large swathes of land that exclusively contemplate mixed use and non-residential uses to be imparted on existing residential settlement patterns does cause a lot of confusion and restricts the capacity of those areas to accommodate dwellings in a more conventional manner.

Take the Strategic Innovation Zone for example, and look at how this is applied in a part of Elizabeth Vale. This Zone contemplates adaptable buildings to be readily changeable from residential to certain forms of commercial development through requiring 3.5m floor to ceiling height at street level, and in this case has no specified building height maximum. That imparts a significant increase in costs to provide buildings with such excessive floor to ceiling heights, where the initial occupancy is tailored for residential use.

The majority of the Zone in Elizabeth Vale, in particular the northern section in this instance, is covered by pre-established residential settlement patterns, with allotments of 700-1000m^2 on frontages of typically between 15 and 20 metres. Unless amalgamated to create development lots these types of allotments are not readily capable of accommodating the mixed-use development envisaged, when the car parking and manoeuvring of service vehicles is considered.

Using the SAPPA wizard there is no assessment pathway or policy generated for group dwellings, residential flat buildings, or row dwellings. It would be anticipated that among

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the range of dwelling typologies that would be expected to complement the mix of land uses in such a zone, these would be the most common.

The Strategic Innovation Zone should be re-written to have more realistic ambitions or its application over large swathes of existing suburban development should be curtailed to allow for and encourage housing that responds to the dire need for appropriate infill at an affordable price point for consumers in these areas.

If the Government pushes for such Zones to continue to exist over established suburbs with existing housing likely to remain for some time the intent should be to have a strategic buy back scheme to deliver on these ambitions at scale, as such developments appear unlikely to occur through piecemeal developments of individual allotments. The example of the Strategic Innovation Zone is shown on the map below:

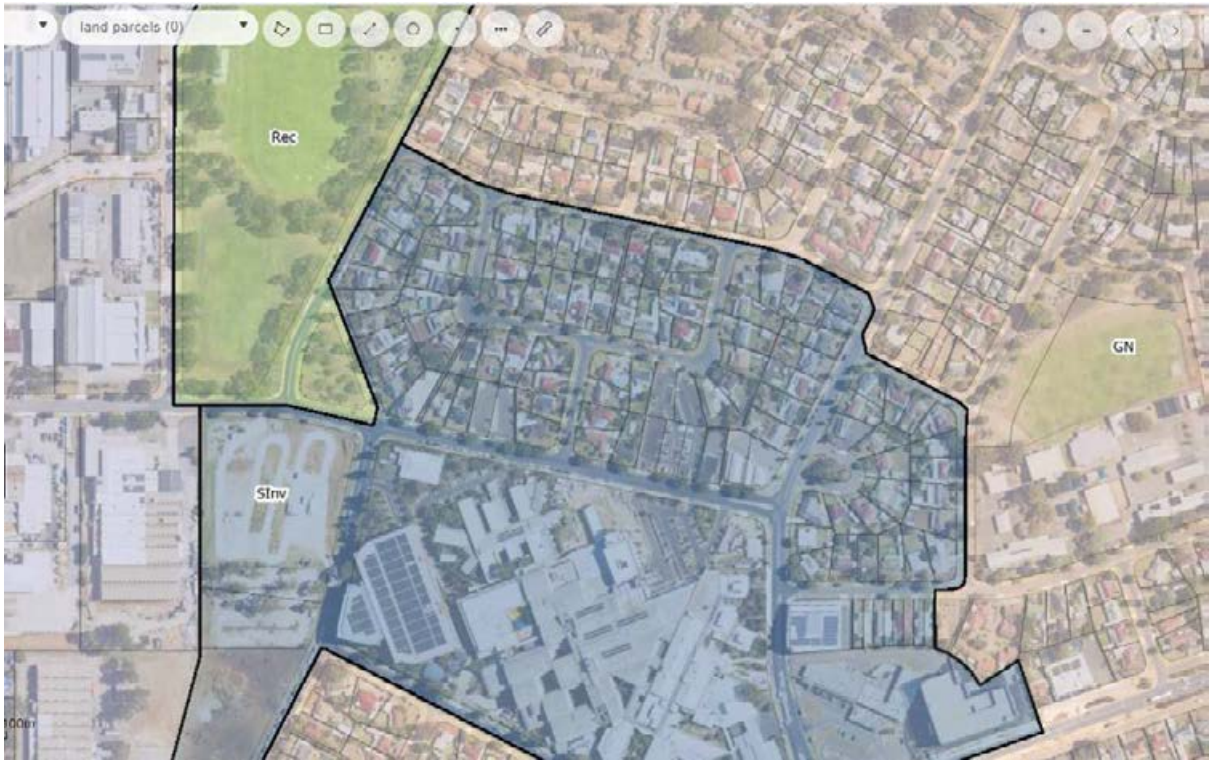


Figure 4: Image from SAPPA with Zones shown (Sinv = Suburban Innovation)

The cost of serviced, residentially zoned land is critical to entrench South Australia at its current competitive advantage to the eastern states, as the desirable and "affordable" alternative. The current rental crisis and ballooning costs of housing supply can be addressed through targeted land release, be that in peri-urban or regional areas, as well as improving the infill supply available and making development less costly, e.g. through putting caps on the ever-increasing open space contributions, sky-rocketing SA Water and SAPN costs associated with infrastructure, and allowing greater yield in areas that are within easy reach of services and transport nodes.

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Master Builders believes that a reduced site area for terrace/row dwellings could also be provided for applications combining the land use and division which involve two storey dwellings, e.g. 200m^2 given the criteria of the General Neighbourhood Zone of the Code can still be achieved with such dwellings despite a reduction in site area. It is noted that the existing policy allows an averaging of the frontages for such housing but not site areas. Noting that extra area is required for the houses at the "ends" of row housing arrangements, the same "averaging" approach should also apply to site areas.

5. Protecting and Enhancing McLaren Vale and Barossa Valley Character Preservation Districts

Related State Planning Policies (SPP)	Would could the planning system do	Ideas for GARP
SPP 8 – Primary Industry	Protect key assets underpinning current and future primary industries	Continue to enforce the McLaren Vale and Barossa Character Preservation Districts

Master Builders supports the maintenance of Barossa and McLaren Vale preservation districts in principle, but the investigation into redefinition of boundaries should form part of the future GARP. There are some areas where new subdivision for urban development purposes is precluded that seem to be appropriate for more housing, and would not detrimentally affect the value of the district. Separately, the Environment and Food Production Areas Overlay should also be investigated and boundaries redefined to carve out areas that are not really contributing to the "food bowl" of Adelaide.

Within the Environment & Food Production Areas there are parcels in the Animal Husbandry Zone as an example, which are within the Gawler River Floodplain but as the flood mitigation works to the Gawler River catchment are undertaken some of this land may be suitable for urban development in future, at least at a low density. Areas around Lewiston appear most appropriate to consider to remove from the EFPA Overlay. These also happen to be areas within the EFPA where there is a more compact settlement pattern of smaller 'hobby farm' allotments. Future subdivision of larger allotments into similar sized allotments would potentially be suitable if the level of flood risk is deemed appropriate.

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SA Map Viewer Fig 5: EFPA in areas north of Gawler River

While it is noted that the Commission is not looking to redefine boundaries of the Character Preservation Districts, as an example of the Barossa Valley Character Preservation District, the small township of Keyneton sits at the eastern edge of this and has an elongated settlement pattern along the roads that lead into the settlement, while areas between these ribbon development are zoned for sensitive infill but precluded from this due to the Character Preservation District Overlay.

While the demand for housing in the Barossa Valley continues to push prices outside of the affordable range, an area such as Keyneton, home to the famous Henschke Wines, could readily be transformed to accommodate an alternative more affordable place to live for those seeking a piece of the Barossa without the price tag of Angaston or Nuriootpa. The Township Zone is elongated along the Stott Highway and Keyneton Rd (east-west and north-south respectively), while Rural Neighbourhood (RuN) Zoned land is located in the north-eastern quadrant and on one title and under the ownership of a single party. The whole township is in the Barossa Valley Character Preservation District, meaning the RuN Zoning ambitions cannot be achieved anyway as land division for urban development is precluded. Noting that this is actually within the Murray Mallee Regional Plan and but the township considers itself part of the Barossa Valley region and close to Angaston perhaps that would indicate the boundaries of the Greater Adelaide Region warrant further investigation.

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Furthermore, a Greater Adelaide Regional Plan that extends many kilometres east of Murray Bridge, where there is limited desire or opportunity for housing stock, but excludes Mannum, which is just over 1 hour from Adelaide does not seem to make much sense.

6. Designated supply of commercial and industrial land

Related State Planning Policies (SPP)	Would could the planning system do	Ideas for GARP
SPP 9 – Employment Lands	Identify sufficient employment lands in appropriate locations to meet future demand for traditional and new industries	Protect and Capitalise on employment land in the inner Metro and Inner Southern regions for future knowledge-based industries and innovation precincts Identify sufficient employment land to service growing populations in areas including Mount Barker, Murray Bridge, Northern Adelaide, Goolwa and Victor Harbor

Master Builders Comments:

A number of our commercial members are citing a significant increase in the cost of commercial land as thwarting their clients' ambitions to expand within the areas in which they are currently operating. The global supply chain crunch across many sectors through the pandemic spawned an increase in demand for local production.

Firmly in the radar of Government should be the consideration of future land supply to cater for niche industry in the State, as well as increase in local manufacturing of smaller scale.

Areas where Home Industry Zone still applies should be looked at as part of the review, with widespread recognition that the zone is not desirable, encouraging land use conflict between businesses and redundant housing to continue in areas such as Athol Park and parts of Wingfield. Converting this land to Employment Zone will provide businesses greater certainty in establishing in such areas and gradually erode the undesirable piecemeal and often dilapidated housing that exists in these areas.

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Other areas where there is currently land close to Mineral Extraction areas (such as Greenwith, near Golden Grove) should also be expanded for increase in supply of land for commercial estates that are compatible with extractive uses and provide a buffer between residential development and mining.

7. Integrated Planning

Related State Planning Policies (SPP)	Would could the planning system do	Ideas for GARP
SPP 1 – Integrated Planning	Identify employment land supported by strategic infrastructure	Identify and protect industrial land to provide employment to growing communities including in key areas such as: • Along the SE Freeway at Monarto, to support growth in Murray Bridge and Mount Barker • On the Fleurieu Peninsula, to support growth in Goolwa and Victor Harbor • At Greater Edinburgh Parks, with appropriate infrastructure and freight connections • At Lonsdale • In North-Western locations including Gillman, Wingfield and Le Fevre Peninsula

Master Builders Comments:

Overall, this is generally supported but it is considered that there needs to be a particular focus on Pallamana and Murray Bridge North in addition to the areas noted near Murray Bridge, co-locating allied industries with the newly rebuilt Thomas Foods meat processing works, which will employ more than 2000 people once it is fully operational at the envisaged capacity. A significant increase in workers

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accommodation in Murray Bridge will also be needed and land catering for this will need to be provided in areas far enough away from

The Mannum-Murray Bridge Road, which connects Thomas Foods to the national highway network, provides opportunities for other industries reliant on larger heavy vehicles, being that this road supports vehicles as large as 36.5m long road trains. The Pallamana land in and around Temora Way where Thomas Foods is located is rural zoned at present, somewhat limiting the type of industry envisaged. There are evaluation distances of around 1.5km for the meat processing and fuel burning licensed activities proposed for the meat processing facility. There is an electrical substation at the junction of Wilkin Road and Mannum-Murray Bridge Road less than 2km from Thomas Foods so access to critical infrastructure is presumed to be good in the locality.

In terms of metropolitan Adelaide supply of appropriately zoned land for employment, this needs to be balanced with the need to accommodate the projected 300'000 additional homes needed over the next 30 years. There is some industry located in Adelaide that is dirty, requires significant evaluation distances, has strict conditions on licensing limiting growth opportunities, and would generally be better suited outside of urban parts of metropolitan Adelaide to allow for increase in the number of dwellings in the Adelaide suburban areas, including some of the areas mentioned (such as Gillman and Wingfield), and also greater focus on innovative industries and technology that drive circular economy goals.

Industry involved in metals casting, plastics granulation, glass manufacturing, concrete & bitumen batching or manufacturing, meat processing, more intensive waste & resource recovery are just some of the types of industries currently found in metropolitan Adelaide suburbs such as Beverley, Kilkenny, Gillman, Wingfield, Gepps Cross, Dry Creek and in various locations on the Le Fevre Peninsula. These generally have significant evaluation distances (meaning separation is required between such uses and dwellings).

Noting that around 10'000 homes are earmarked for Dry Creek, there is potential conflict between established industrial uses nearby and the introduction of a significant number of sensitive receivers. Longer term, some of these types of uses may inhibit the future brownfield development plans for more housing in areas close to where such facilities exist.

Strategic Employment land should be earmarked for areas that are not liable to encroachment by urban development, to facilitate better use of more central areas of Adelaide for housing. This will in turn reduce the pressure on greenfield development close to major food and wine production areas.

In the longer term there should be a push for Adelaide Brighton Cement to be located outside of metropolitan Adelaide on a strategic freight route. This, more than any other industry in the Le Fevre Peninsula, has left a lasting legacy on the residential populations around Peterhead, parts of Birkenhead, Largs Bay and Largs North.

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When Incitec Pivot closed its major fertiliser production and storage operations this paved the way for a significant urban renewal project to finally take off, in the nearby Dock 1 precinct of Port Adelaide. It is foreshadowed that the closure of Adelaide Brighton Cement for relocation would have a similar revitalising effect on the parts of the Le Fevre Peninsula closer to Semaphore and towards Victoria Road and open up areas for more boutique technology-based industries and commercial enterprises to support the naval and defence industry already homed on the northern part of the peninsula, while also allowing more residential infill where it is currently prohibited. Incentivising a move for the cement production giant would need to be part of the solution with Government backing, as was the case with Pivot.

8. Making Code Policy more Responsive to Case Law

It is considered that the hierarchy of the Planning and Design Code needs to adequately reflect the State Planning Policies (SPPs). There is not enough of a policy link between the "motherhood" SPP policies and the "day to day" provisions applied by authorities, application by application.

A number of recent Court judgements expose concerning flaws in the Code and Environment, Resources and Development Court Commissioners have been left baffled by some of the problematic wording in some policies, with a number of scathing judgments over the last 18 months that should be taken into account when re-writing policy.

Use of terms within Neighbourhood type zones that are not familiar in previous planning terminology and potentially contradictory due to being able to be confused with terms used in other Zones has left decision makers open to scrutiny.

It was only recently that the Supreme Court ruled in favour of a third party appellant on judicial review grounds for a tourism development in the Barossa Valley Council region. Despite the Designated Performance Feature (DPF) 1.1 of the Rural Zone contemplating tourist accommodation, the Court determined the decision to have been errant on the basis of not properly considering whether this was "seriously at variance" to the Code on the basis of not being associated with Primary Production.

The judgement could have wide-ranging ramifications for decision makers and proponents in regional areas seeking to provide the necessary "value adding" developments that support the economic prosperity of our regions. It may also have substantial impact on "scrub blocks" in regional areas in the Rural Zone which have no primary production value. Many people have been attracted to these over the pandemic as an escape from the city, and are seeking to build houses upon them. It is important that some tests are provided in policy that support non-primary production uses better in regional areas where there is no prospect of primary production opccuring on

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the land. Equally, protections for established primary production activity should be reinforced with supportive policy for workers accommodation, reduced amenity expectations for permanent residential in adjacent sites due to farming taking precedence, and greater flexibility around land divisions that allow for family succession arrangements and larger farms to take land off smaller operators through boundary realignments (which is a common occurrence) while allowing dwellings to be constructed / remain on the excised land.

Front setback references

Master Builders does not believe the General Neighbourhood policy for front setbacks to be appropriate for areas in which, clearly, a new streetscape character is sought. Reference to "existing" housing stock on adjacent sites facing the same street places limitation on infill and particularly where there is an ad hoc setback pattern in the street and the subject site happens to be alongside one or two remnant post-war dwellings much further from the street than what might be the emerging setback pattern seen in newer dwellings. A separate policy mechanism that recognises an emerging streetscape pattern is needed.

Additionally, front setbacks should not purely reference dwellings that face the same primary street, but consider the secondary street setback of an adjacent dwelling. Master Builders had hoped this may have been addressed with the MTE Code Amendment, so this is a reiteration of a point previously raised when consulted on the planning system.

Stormwater Management Overlay

One of the profoundly flawed and unnecessary Code policies is DTS/DPF 1.1 Part (b) of the Stormwater Management Overlay with a requirement for the roof area of dwellings to comprise not less than 80% of the impervious area on the site.

The attainment of a minimum 80% dwelling roof coverage to total impervious surfaces for many dwellings is inherently difficult when one proposes a dwelling on a subdivided site and there is a minimum 900mm perimeter pathway *(as required by the Building Code with falls away from footings) and a standard width driveway.

Furthermore, the way to achieve the 80% threshold is often to increase the eaves width and then just vary the applicaiton at building rules consent stage through a Regulation 65 Amendment.

The policy serves no planning purpose not achieved by other policy and does not

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correlate to the Performance Outcome, seeking to:

PO 1.1

Residential development is designed to capture and re-use stormwater to:

1. *maximise conservation of water resources*
2. *manage peak stormwater runoff flows and volume to ensure the carrying capacities of downstream systems are not overloaded*
3. *manage stormwater runoff quality.*

Part (a) of the DPF/DTS criteria outline the size of retention/detention tank dependent on the site area and the percentage of impervious land. The PO is attained by Part (a) without Part (b) being required. Limiting the proportion of the dwelling roof area to overall impervious area does not directly correlate to managing peak flows.

If the planning intent is to limit the amount of impervious area comprised by roof areas on any particular site, the site coverage provisions are already in place to deal specifically with this issue and there is no loophole to avoid these.

Site coverage is designed to limit the total built footprint on sites, presumably to also limit stormwater output from sites, but the Performance Outcome relevant to site cover does not specifically mention this as one of the reasons to limit coverage.

The site coverage provisions are called into the assessment for any additions, sheds and ancillary roofed structures. These are Zone specific and relate to the type of dwelling.

Overall, SW Management Overlay DPF/DTS 1.1 Part (b) serves no purpose other than create complexity in the documentation and assessment. Master Builders suggest removal of this altogether.

It is also highlighted that DTS/DPF 1.1 Part (a) includes an option to plumb rainwater to a hot water service. Having untreated roof water connected to a hot water service conflicts with the plumbing code (NCC Vol 3 and AS 3500.1 (a primary referenced document)) and may void warranties for hot water service units.

Where this is an option, it must be reinforced with policy that highlights the risks of this, and how these are to be overcome. Master Builders believes this to be poor policy and is better removed.

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9. Confusing Terminology that is not Defined

The Code introduces terms such as "employment" land use and "neighbourhood" when speaking to themes of encouraging certain forms of non-residential uses within the suite of Neighbourhood-type Zones, for improving activity, convenience and walkability. This is seen as follows in the General Neighbourhood Zone as an example:

Desired Outcome (DO) 1

> *Low-rise, low and medium-density housing that supports a range of needs and lifestyles located within easy reach of services and facilities. Employment and community service uses contribute to making the neighbourhood a convenient place to live without compromising residential amenity.*
>
> (emphasis added)

In addition to the Desired Outcome, Performance Outcomes PO 1.1, PO 1.3 and PO 1.5 of the General Neighbourhood Zone include use of the above terms, which are not defined in the Code.

There was much discussion surrounding what an "employment land use" entails in the context of the General Neighbourhood Zone in the recent matter of *Jahk Enterprises Pty Ltd ATF Jahk Trust v the Assessment Panel of City of Campbelltown* ERD 13-2022.

When one considers "employment" uses that could mean virtually anything – surely these uses are not those actually envisaged in the "Employment" zones, i.e. larger commercial, storage, distribution and industrial uses.

In the Jahk matter a car wash was determined by the Commissioner to be a "domestic services establishment" and therefore a shop. It is clear that the authors of the Code did not envisage including this commercial type of land use as the type of use expected in a General Neighbourhood Zone, so a definition specifically for car wash which includes an exclusion of "shop" from the definition would be useful.

There needs to be another term that includes specifically the types of non-residential uses encouraged in the various Neighbourhood-type Zones within the Desired Outcome and how these should be situated in the context of any given area within the Zone. The focus should be on "active street frontages" and "walkability" for the types of non-residential uses that complement residential uses in a neighbourhood-type zone.

Noting that the zones are now vast areas across multiple Council regions, if there is a wider catchment analysis required of planning authorities when considering the

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serviceability and convenience aspects of a non-residential proposal, that must be given some quantitative and qualitative guidance with appropriate terms. If using a term such as neighbourhood instead of zone or locality (which have a generally accepted definition) provide clarity as to what is meant by that (such as a specified distance to any given site).

10. Overlays and their Function

Overlays can have a policy function, a referral function, or determine the assessment pathways available for certain types of development. They can do all three things.

Master Builders believes there are too many overlays and many that simply provide policy without really serving a purpose for the majority of the development applications which will call these in through SAPPA. There are those that have the unfortunate and unintended consequence of removing a potential DTS assessment pathway such as those previously mentioned.

In many instances a development is able to achieve what would be the DTS criteria of the relevant provisions of the Planning and Design Code (*the Code) that are generated by the SAPPA Wizard, but cannot be DTS by virtue of the fact there is an Overlay that ousts that assessment pathway.

Overlay policies that would be better applied in the General Modules

One of the more confusing elements of the new planning system is the excessive number of overlays. There are more than 70 and often Overlays that have little or no relevance to the assessment are called up when undertaking the "Wizard" search on a property and entering the type of development.

There is a greater issue at play here in the fundamentals of how the e-planning system is built, and potentially a future improvement of the system that identifies the *relevant* overlays using the search tools would assist with resolving this.

The more immediate improvements could involve transferring more 'generalised' policy within certain overlays into general policy modules.

Noting there is a spatial application of the overlays, another mechanism would be needed to identify where "general" policy applies for the specific aspects of policy. For example, planning policy within the Significant and Regulated trees Overlay could easily be provided in general development policy, as could Urban Tree Canopy, Affordable

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Housing and Stormwater Management, Prescribed Water Resources and Prescribed Wells Area, however within a subset of planning rules applicable to metropolitan Adelaide and other select locations. After all, apart from the Prescribed Wells Area, these overlays apply mostly within metropolitan Adelaide.

Prescribed Water Resources Overlay and Prescribed Wells Area Overlay

The Prescribed Water Resources Overlay is called up when using SAPPA on any address where this applies, but the types of development applicable to the policy within the overlay are limited to a select range of uses that impact on natural surface flows, such as dams, commercial forestry, horticulture, aquaculture and other activities predisposed to affecting the health and natural flow paths of water resources.

Similarly, the Prescribed Wells Area Overlay is called up for assessment of a range of irrelevant forms of development. Both of these overlays contain policy that is applicable to a very limited subset of land uses and types of development.

Master Builders, while acknowledging the spatial application of the policies in these particular areas, raises concern about the confusion that arises from bringing in irrelevant policy for consideration in the assessment of residential and similar land uses.

Fundamentally, the electronic planning system needs to be re-built in a manner that dissects the relevant overlays for assessment from the irrelevant ones, depending on the data input (i.e. type of development). This is something that is naturally outside of the Code review, but an important issue that should be 'front and centre' of future system improvements.

Significant & Regulated Trees, Urban Tree Canopy and Stormwater Management

As the significant and regulated tree provisions only apply to metropolitan Adelaide, as do a number of other overlays such as Urban Tree Canopy and Stormwater Management it would make sense to separate the policies applicable to metro Adelaide by simpler means. Those that only apply in metropolitan Adelaide could fall under a separate umbrella of "metropolitan Adelaide" general policy that in some cases is triggered only for the *relevant* forms of development entered in the Wizard.

Significant and regulated trees applies across the whole of metropolitan Adelaide so would be easy to transfer to a metropolitan Adelaide general policy module.

The Urban Tree Canopy is similar, but only applies where there are Neighbourhood type

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Zones, and could just as easily transfer into an Adelaide metro-based policy module, applicable for residential development comprising new dwellings within Neighbourhood type zones.

The Stormwater Management Overlay commands that a specific amount of retention and detention is provided for new dwelling applications and applies likewise to Neighbourhood type zones and is limited to metropolitan Adelaide. Again, this could apply as general policy within a metropolitan Adelaide based module and the relevant triggers being "new dwellings". The overlay is spatially applied over Neighbourhood type zones generally, but there are some parts of Adelaide not covered by the policy, presumably areas with their own council managed retention and detention schemes such as Aquifer Surface Recharge (ASR) schemes (e.g. parts of Marion and new development at Moana, south of Karko Drive and west of Commercial Road). Policy could be written within a general module to exempt development serviced by such a scheme.

Native Vegetation Overlay

This Overlay applies not only in Hills and regional areas but in areas in which much of Adelaide's future growth is being accommodated at present, and can be found in parts of the Masterplanned Neighbourhood Zone in which there is little or no native vegetation.

The redefinition of the boundaries of the Native Vegetation Overlay should be investigated as part of the Code review to exclude new residential subdivisions in the Masterplanned Neighbourhood Zone (e.g. new parts of Moana) and Masterplanned Township Zone (e.g. Two Wells extension), and built up areas within country townships (e.g. within the Township Zone).

Affordable Housing Overlay

Master Builders questions the spatial application of policy for affordable housing policy in principle. There is a growing demand for affordable housing and some of the areas that are not covered by the overlay are perplexing. For example, the almost the whole north-western quadrant of Adelaide including areas such as Seaton, Royal Park, Albert Park, Woodville North and Croydon Park where there are large areas or pockets of social housing, current and former SAHT properties ripe for renewal, not covered by the Overlay. The following map depicts the issue with spatial application:

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SAPPA extract showing the Spatial application of the Affordable Housing Overlay

Master Builders question the legitimacy of the Government's commitment to providing for future affordable housing stock when the application of the Overlay appears to be 'ad hoc' missing critical areas in Adelaide, while including some areas in which realistically property sale prices will never be within the value thresholds to meet the affordable housing criteria, such as around Crafers and Stirling.

Affordable housing policy allows for greater uplift in the development potential of land and there are a number of members that are ready and willing to step into this market to provide for the shortage of this type of stock, if financial viability is there.

Quite simply, Master Builders sees no rationale for affordable housing policy to be within overlays. It should apply across the board through South Australia.

Traffic Generating Development Overlay

The Traffic Generating Development Overlay has no relevance to most types of development and land uses. Even the land uses that are targeted in the policy are those of a higher 'traffic generating' potential, such as residential land divisions over 50 allotments, industry with a gross leasable area of 20'000m², educational facilities with a capacity of 250 students or more and retail development with a gross leasable area of 2'000m². This applies in metropolitan Adelaide for any land that is located within 250m of a State maintained road.

There is no reason that a specific General policy module could not be provided to specifically deal with traffic generating types of development. The advantage of the

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General module is that it can be used for a range of development scenarios that the policy may not capture if only spatially applied, and would not be called up for 99% of development applications.

Hazards - Bushfire (Urban Interface Area) Overlay

Similar to the Traffic Generating Development Overlay, this applies to a very small subset of development, yet appears on the assessment "wizard" for a wide range of development in many areas. Its policy concerns larger land divisions catering for "through" access being provided from higher bushfire risk areas via roadways allowing ready escape routes from more hazardous fire prone areas.

The policy could just as readily be transferred to a "General" module that relates specifically to land divisions greater than 9 allotments and abutting more bushfire prone environments. The CFS referral trigger could easily be put into Part 9 of the Planning and Design Code for such land divisions.

11. Dwellings in Masterplanned Areas

Some of our members are reporting issues with dwellings being able to occur "as of right" in areas that previously could have been 'residential code' or complying in the previous Development Plans due to the Emerging Activity Centre Subzone.

Others are reporting that Councils are withholding Development Approval on dwellings that are Accepted Development in the Masterplanned Neighbourhood Zone even when the accepted development criteria have been met and the Building Rules Consent has been granted.

Emerging Activity Centres Subzone

The Emerging Activity Centre Subzone within the Masterplanned Neighbourhood Zone is unrealistic in its ambitions in many cases and problematic for *existing* residential parcels of land that have clearly been earmarked for detached standalone housing stock, rather than mixed uses.

If the Emerging Activity Subzone is to be taken seriously, the Performance Outcomes should focus on larger "development lots" within Masterplanned Neighbourhood Zones, for example, >1500m^2 allotments reserved for future mixed use, residential flat buildings or

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social housing development in a masterplan, even if its spatial application extends over wider areas of Masterplanned Neighbourhood Zones.

In some areas the manner in which this subzone has been applied spatially can only be described as ad hoc, without specific reference to the plans for master-planned areas.

Where there *is* a Concept Plan that underpins the Masterplanned Neighbourhood Zone it would be logical to remove the subzone altogether to reduce the layers of policy through consolidating Activity Centre type policy within the Zone and having reference to "where located in an activity centre as delineated on a Concept Plan".

Complexity of Assessment

The layers of policy required of one to sift through within some parts of master-planned areas just to confirm whether a dwelling on a parcel of land clearly earmarked for a detached dwelling can be assessed as DTS are mind-boggling.

Any site within a masterplanned area where there is no existing character to reference, should be able to have an easy DTS pathway where there are a set of standardised rules that can be navigated by any lay person.

The following example at Andrews Farm is just one of many where the process to assess the application is too convoluted. This example requires review of Zone and Subzone policy, 10 separate overlays and 3 concept plans. The most baffling thing is that Heritage Adjacency overlay appears, which removes any potential DTS pathway altogether. There are no heritage places near the development site.

Location: 17 SAMPHIRE AV ANDREWS FARM SA 5114 LT 535
Valuation: 2906930609
Title Prefix: CT
Title Volume: 6245
Title Folio: 868
SAILIS: Link
Planning Report: Print Report

Planning & Design Code:
All policies that apply to this address
Policies for a development at this address

Zones
Master Planned Neighbourhood - MPN

Subzones
Emerging Activity Centre - EAC

Overlays

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Affordable Housing
The Affordable Housing Overlay seeks to ensure the integration of a range of affordable dwelling types into residential and mixed use development.
Building Near Airfields
The Building Near Airfields Overlay seeks to ensure development does not pose a hazard to the operational and safety requirements of commercial and military airfields.
Defence Aviation Area - All structures over 15 metres
The Defence Aviation Area Overlay seeks to ensure building height does not pose a hazard to the operational and safety requirements of Defence Aviation Areas.
Hazards (Bushfire - Urban Interface)
The Hazards (Bushfire - Urban Interface) Overlay seeks to ensure urban neighbourhoods adjoining bushfire risk areas allow access through to bushfire risk areas, are designed to protect life and property from the threat of bushfire and facilitate evacuation to areas safe from bushfire danger.
Heritage Adjacency
The Heritage Adjacency Overlay seeks to ensure development adjacent to State and Local Heritage Places maintains the heritage and cultural values of those places.
Hazards (Flooding - General)
The Hazards (Flooding - General) Overlay seeks to minimise impacts of general flood risk through appropriate siting and design of development.
Noise and Air Emissions
The Noise and Air Emissions Overlay seeks to protect new noise and air quality sensitive development from adverse impacts of noise and air emissions.
Prescribed Wells Area
The Prescribed Wells Area Overlay seeks to ensure sustainable water use in prescribed wells areas.
Regulated and Significant Tree
The Regulated and Significant Tree Overlay seeks to mitigate the loss of regulated trees through appropriate development and redevelopment.
Traffic Generating Development
The Traffic Generating Development Overlay aims to ensure safe and efficient vehicle movement and access along urban transport routes and major urban transport routes.

Variations

Concept Plan - 18
Concept Plan 18 - Playford North
Concept Plan - 19
Concept Plan 19 - Playford North Infrastructure
Concept Plan - 81
Concept Plan 81 - Edinburgh Defence Airfield Lighting Constraints



SAPPA extract showing the example at 17 Samphire Avenue, Andrews Farm

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12. Definitions & Notification Process

Additional Land Use Definitions

Some additional land use definitions would assist with the interpretation of how certain contemporary land uses may "fit" within the broader scheme of the Planning and Design Code, and Zones in which these are appropriate.

One that has been in the planning vernacular for some time now, but is yet to surface as a defined land use, is a training facility for trade, industry and vocational training. Often, such uses involve the operation in a learning environment of heavy machinery, cutting, finishing, moving or lifting processes or activities that would ordinarily be undertaken on a work site, such as within production line arrangements, building sites, industrial and commercial sites and major food preparation. The type of use is not an educational establishment and is often found wanting with regard to Zones that specifically contemplate this.

Hands-on learning activities may generate noise, fumes, vibration, smell or other externalities akin to industrial processes. Ordinarily, an Employment type Zone would appear to be the most appropriate Zone for such a use.

Master Builders believes a *Trade Training Facility*, a term widely known in the industry, is the appropriate definition and could be listed in the exclusions list of "educational establishment" in Part 7 (Land Use definitions) and defined separately. Master Builders believes the above considerations should be relevant for appropriately defining the use.

Specific Excluded Land Use Classes (short term stays)

In a time where there is separate legislation tabled to deal with the amenity impacts of so-called "party houses" (places of transient and infrequent occupation for tourism on parts of residential sites) through platforms such as Air BnB & Stayz, there also needs to be specifically excluded land use classification so that this type of accommodation, where provided on a limited basis on a site in which there is prevailing permanent residential occupation (not necessarily being within the same building), does NOT alter the land use. The problematic short term let part of the market is by far the minority, but this is what gets the headlines.

Often land use arguments are dragged before Council Assessment Panels and the Courts due to the inconsistency with regard to how tourist accommodation is defined and applied. The legal position within SA remains unclear and the facts of each individual case will ultimately determine how the land use may be perceived in determining a

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"change" of land use.

Strictly speaking, without exclusion, the current definition of tourist accommodation in the Code does not consider the length of stays, whether there is residential use that prevails on the site, or total number of days for which a site is used for such purposes in a year. It leaves these elements as open to interpretation whether any non-permanent accommodation changes the land use, and reliant on conflicting and ambiguous case law.

Some Councils will take a pragmatic approach, while others will take a precautionary approach and some of the most obstructionist Councils are those that contain some of South Australia's greatest tourism drawcards.

The following is considered to be a mechanism to deal with the above issue:

Land Use Term (Column A)	Definition (Column B)	Includes (Column C)	Excludes (Column D)
Tourist accommodation	Means premises in which temporary or short-term accommodation is provided to travellers on a commercial basis.		Campground *Use of part of a site for short-term accommodation on a commercial basis in which there continues to be permanent residential occupancy on site (within the same building or a separate building on site) and such tenure does not involve more persons in short term accommodation at any one time on site than able to be accommodated in the balance of the land for permanent residential occupation; does not exceed total occupancy of 3 months of a calendar year, and no single lease comprises continued occupancy for a period of 28 days or more*

Administrative Definitions

The term ***replacement building*** must be reviewed such that it can include reference to a building that is not yet demolished rather than one that has been in the last 3 years. At present a building that is replacing an existing building yet to be demolished is not defined in such a manner and therefore, in many cases cannot be assessed as DTS.

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13. Conclusions

Master Builders SA supports the general themes of the Greater Adelaide Regional Plan in principle, and looks forward to future workshops in which some of the ideas can be fleshed out in further detail.

Master Builders has earmarked a number of specific areas on the Heat Map to link to some of the points raised in this submission, and a copy of the points and property/area references is in a table in the appendices to this submission.

The challenge upon us is enormous and the GARP is a part of the solution, but has its limitations. It will be vital that moving forward, the authors of the GARP have involvement in steering policy changes in the Code to ensure the messages are delivered successfully into workable planning policy.

Master Builders SA thanks the Expert Panel for consideration of this submission and would welcome becoming involved in further workshopping of ideas that can drive the Greater Adelaide Regional Plan.

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REFERENCES & MAPS

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https://www.ahuri.edu.au/research/brief/why-does-australia-have-rental-crisis-and-what-can-be-done-about-it

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https://www.buildaustralia.com.au/news_article/cost-of-building-set-to-increase/

The Post, Adelaide 8 September 2023 (online)

https://thepostsa.au/infrastructure/2023/09/07/adelaides-great-but-greater-adelaides-getting-even-greater/

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GREENWITH EXPANSION OF EMPLOYMENT TYPE ZONING



Investigate highlighted land for re-zoning to Employment or Strategic Employment (in Greenwith Rd more than 300m from the nearest Neighbourhood Zone) to facilitate greater circular economy type industries to establish and form a buffer between the existing Resource Extraction Zone in Greenwith/Golden Grove and the residential development to the west. The heritage listed church at 1245 Goden Grove Rd should be placed into an appropriate Zone for a community type use. The highlighted strip of land along Hancock Rd could be earmarked as Metropolitan Open Space System (MOSS) Zone to provide a vegetated walking path and bikeway connecting to the reserve to the south.



Investigate business case to subsidise the move of ABC from Port Adelaide and provide rezoning opportunity for smaller boutique industry and circular economy businesses. Review restrictions on subdivision nearby for opportunities to up-zone when ABC is gone.

CORRECTING ZONE BOUNDARIES – MAJORS / MAIN SOUTH RD



Investigate moving allotment at the corner of Main South Rd and Majors Rd, which is being developed at present, into an appropriate zone, rather than Conservation.

HIGHBURY OPEN SPACE ZONING BOUNDARIES AND PROVIDING HILLS NEIGHBOURHOOD ZONING



Consider rezoning area contained in Resource Extraction Zone west of Halls Rd to Open Space Zone and rezoning the area containing residential development on Torrens Rd / Mulberry Drive into the Hills Neighbourhood Zone with a TNV of around 600 to 800m² for site area to enable low density residential development close to the Open Space while being sympathetic to terrain.

NORMANVILLE RURAL NEIGHBOURHOOD TYPE ZONING & EXPANSION OF TOWNSHIP



Consider rezoning area north of current extremity of Normanville township towards Carrickalinga to Neighbourhood Zone and rezoning the Rural Living Zone in the Normanville Heights area to Rural Neighbourhood or Hills Neighbourhood with TNV of site area around 1200 to 2000m^2 and minimum frontages of 20m. The area west of the service station is currently zoned Rural Living and would appear to be more suited to either Neighbourhood or a Zone that favours commercial types of development.



Consider rezoning smaller allotments along the eastern side of Mannum Murray Bridge Rd to Employment Zoned land to cater for the allied industries to Thomas Foods that could benefit from establishing close by. The provision for industrial land outside of the Murray Bridge township may enable some employment land in Murray Bridge to be converted to residential use through rezoning. Additionally, significant accommodation will be required to cater for the workers when Thomas Foods is operating at full capacity so some land may need to be earmarked for workers accommodation.

ST MARYS & SURROUNDS HOUSING DIVERSITY NEIGHBOURHOOD TYPE ZONING



Consider rezoning Employment Zoned land in between Paul, Laura, Quinlan and Brookman Avenues to a Zone catering for mixed use development given its proximity to Tonsley Innovation precinct and the former Panther Park. Also remove three commercial allotments east of Alfred Ave from Employment Zone. Rezone St Marys and surrounding suburbs to address outdated housing infill legacy policy from the former Development Plan. Create a Master Plan for St Marys and Pasadena with green linkages earmarked and catalyst sites for redevelopment along these green corridors, having high quality pedestrian and cycling links between Tonsley and Pasadena Foodland. Investigate ways to link east-west through property acquisition to provide these linkages and open up potential catalyst sites

From: PlanSA Submissions
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:12:08 PM
Attachments: MBASA_Submission_GARP-5.11.23.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Advocacy Organisation
Given name:	Kym
Family name:	Morgan
Organisation:	Master Builders SA
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Please find attached a submission from Master Builders SA on the Greater Adelaide Regional Plan Discussion Paper.
Attachment 1:	MBASA_Submission_GARP-5.11.23.pdf, type application/pdf, 3.4 MB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

From:	PlanSA Submissions
To:	DTI:PlanSA Submissions
Subject:	Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Date:	Monday, 6 November 2023 4:15:38 PM
Attachments:	MBASA_Submission_GARP-FINAL-5.11.23.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Development Industry
Given name:	Andrew
Family name:	Cronin
Organisation:	Master Builders Association of SA Inc
Email address:	[redacted]
Phone number:	[redacted]
Comments:	See attached submission on behalf of the Master Builders Association of SA
Attachment 1:	MBASA_Submission_GARP-FINAL-5.11.23.pdf, type application/pdf, 3.4 MB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: MEA Submission - Greater Adelaide Regional Plan
Date: Tuesday, 24 October 2023 8:42:29 PM
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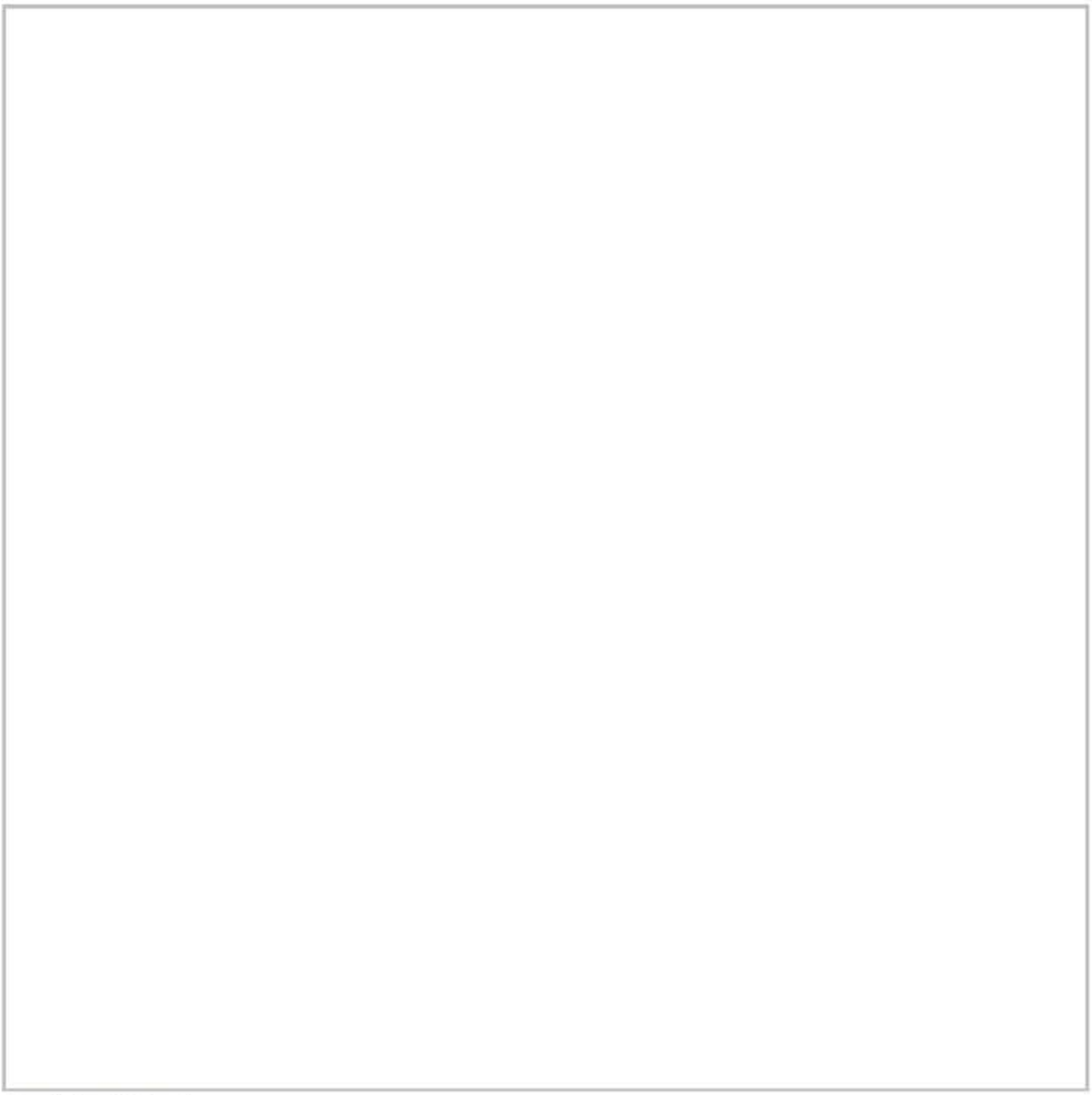
Please see attached Master Electrician's submission in response to the 'Greater Adelaide Regional Plan' discussion paper.

We are happy for this to be publicly published.

Thanks,
Georgia.

Georgia Holmes
Policy & Communications Advisor

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MASTER ELECTRICIANS AUSTRALIA

Lead.Connect.

Greater Adelaide Regional Plan Discussion Paper

Electrifying Adelaide's Future.

Chris Lehmann & Georgia Holmes

24 October 2023

Master Electricians Australia (MEA) is the trade association representing electrical contractors recognised by industry, government and the community as the electrical industry's leading business partner, knowledge source and advocate. Our website is www.masterelectricians.com.au

The *Greater Adelaide Regional Plan Discussion Paper* (the Plan) presents an opportunity for "South Australia … to be known as an ambitious and capable state that embraces technology and drives innovation"[1] through designing and implementing distributed energy resource (DER) policies. Such technologies will contribute towards a "greener, wilder and climate resilient environment"[2] and a "stronger economy built on a smarter, cleaner, regenerative future"[3].

DER are privately owned, self-generating energy assets which reduces reliance on traditional fossil-fuel transmission networks. This technology not only allow for greener energy, but also provide consumers with power of choice (PoC), thereby reducing overall energy prices and shifting the load of traditional energy times.

SA has an opportunity to mandate policies which alleviate cost pressures faced by consumers and reduce carbon emissions. Our suggestions throughout this submission support the climate and decarbonisation State Priorities and Directions (SPPs), in particular:

- SPP 1 - Integrated planning
- SPP 5 - Climate change
- SPP 12 - Energy

Throughout this submission, MEA will advocate that DER infrastructure is the key to achieving net zero emissions and 100% renewable electricity if supported by introducing the following policies:

- Mandatory new build electrification
- Secondary settlement points
- Electric vehicles
- Time of use tariffs
- Private asset maintenance
- The role of the licenced electrical industry in electrification.

We further highlight that focusing on addressing the current skills shortage is essential for enabling the Plan to be efficiently actioned. We recommend short-term solution of inter-state qualification recognition and long-term solution of vocational education training (VET) subjects built into secondary school facilities and curriculum.

Please note that distributed energy resources (DER) and consumer energy resources (CER) are used interchangeably. Throughout this submission, we will refer to the technology as DER.

[1] 'Greater Adelaide Regional Plan Discussion Paper' *State Planning Commission* [2023] 68
[2] *Ibid* 84
[3] *Ibid* 84

DER

What is DER?

DER are used to naturally generate, store and utilise energy, and presents a mitigating solution to climate change which saves costs and utilises excess solar. MEA strongly advocate for policies to be implemented mandating the installation of this technology.

Examples of DER include:

- Rooftop solar photovoltaic units
- Wind generating units
- Battery storage
- Electric vehicle batteries.

Consumers gain the ability to take control of their energy and are enabled to enter into trading arrangements that could shift loads, using power (soaking) when it is cheapest for flexible loads (hot water, ovens, EV charging, etc) and delivering power back (sourcing) from storage sources (batteries, bi-directional EV's) when energy prices are higher, giving households and businesses the ability to pro-actively reduce their overall power costs. DER is to be limited to flexible loads while the traditional network should continue to be utilised for inflexible loads (i.e. fridges, life support, etc).

The dream of changing the energy demand curve (the so called "ducks back") by taking the excess/cheap energy produced in the middle of the day, and using it during times of peak demand, thereby flattening the demand curve and stabilising electricity prices can be realised in a reasonably short time period if we make some rational, sensible decisions. The technology is here now, the regulations just need to catch up.

Rooftop Solar Photovoltaic Units (Solar PV)

Solar PV is becoming increasingly popular amongst residential and commercial buildings thereby making it easier for SA to integrate solar installation policies within the Plan. We recommend such policies are introduced in concert with home battery and EV charging requirements (this is discussed in greater detail under 'regulations').

Digital Smart Meters

Digital smart meters provide consumers with the power of choice (PoC), designed to promote choice and efficiency in the delivery of energy to the end point consumer. Unlike traditional meters, smart meters allow for real time measurement and control of energy use. MEA believe these are necessary for achieving SA's commitment towards net 100% renewable energy by 2030 and net zero emissions by 2050[4].

Home Batteries

Home batteries are necessary to optimise DER's capabilities. These enable consumers to store self-generated energy (from Solar PVs) and either soak or send back to the grid during peak demand times.

[4] *Ibid* 46

We recommend government provides incentives designed to offset installation costs. EV batteries are great examples of home battery storage options which are going to be increasingly accessible as EV adoption increases.

Home Energy Management Systems (HEMS)

HEMS enable consumers to remotely control smart technology appliances. When paired with digital smart meters, consumers PoC becomes optimised. Integrating incentive polices for households and businesses to adopt HEMS could have a rapid and significant impact on SA's renewable and emissions targets. It is a powerful companion to tariff reform and home battery strategies to improve energy efficiency and decrease emissions across SA.

DER Related Regulations.

The technology for DER is here now; it is the lack of regulations that is inhibiting the full benefits of DER from being realised. The Plan presents an opportunity to implement electrification regulations and policies which we heavily encourage the SA Government to take advantage of. Below are MEA's recommendation which encourage "policies and regulatory tools to support decarbonisation"[5].

New Builds

To achieve the target of net 100 per cent renewable electricity by 2030, the Government needs to take swift action enforcing DER policies. We recommend introducing regulations mandating DER installation within new-builds thereby removing reliance on fossil fuels.

Secondary Settlement Points

We recommend implementing policies that allow residential and commercial premises to install secondary settlement points that have their own meters. This will allow for separate identification and measurement of flexible energy loads, thereby enabling DER benefits to be fully optimised. Secondary settlement points will allow both domestic and C&I consumers to gain control over the utilisation, storage and supply of surplus flexible energy allowing cost saving benefits. It is important that secondary settlement points are to be used strictly for DER flexible loads while necessities such as lights, fridges, general power circuits, water pumps and life-support are to remain with the primary settlement point controlling the passive load.

Electric Vehicles (EVs)

The "estimated 30% [of] vehicle sales [expected to be] EVs in 10-15 years"[6] highlights the need for the SA Government to ensure private and public infrastructure is designed to facilitate the increased demand on the grid. Policies to support charging stations are necessary to ensure vehicles can be charged. We believe EV's present opportunities for the energy network. Through bi-directional charging, EV batteries can be used to soak the excess supply of PV sourced during daylight hours which can be later used to charge the vehicle and supply energy for flexible loads at later points in the day as needed. Installation of EV infrastructure in homes and businesses in concert with HEMS for residential

[5] (n 1) 46
[6] *Ibid* 48

buildings and Building Management Systems (BMS) for commercial businesses would increase the stability of the network.

Time of Use Tariffs

MEA believes the best way to have consumers contribute towards reducing carbon emissions is through introducing flexible demand time of use (ToU) tariffs. These tariffs impose charges and provide rebates for DER users.

During the middle of the day, the network experiences minimum demand for energy, while DER generated energy is at its greatest. Then, during 4PM-9PM, the network experiences peak demand for energy, while DER energy is no longer generated. Implementing ToU tariffs sends prices signals to consumers when to utilise stored energy from Home Battery Storage and when to send excess energy back to the grid.

During the minimum demand window, ToU tariffs would deter consumers from sending excess energy back to the grid, preventing an oversupply of energy on the network. Then, during the peak demand window when energy rates are at their highest, ToU tariffs would provide consumers with rebates, encouraging excess energy to be supplied to the grid thereby assisting supply to meet demand.

Consumers can react to ToU tariffs through digital smart meters and Home Energy Management Systems.

Private Asset Maintenance

Minimum standards of safety and reliability should be the responsibility of anyone receiving Feed in Tariffs (FIT). An increase in the prevalence of DC isolator failures, high penetration of solar PV systems and the expected increase in the installation of home batteries and vehicle chargers makes it necessary to ensure that these assets are safe for consumers and reliable for the stability and capacity of the grid.

We propose these inspections are to be performed by licenced electrical contractors every five years. Funding of inspections are to be covered by levying a monthly fee on consumers' electricity bills, organised by the retailer.

Licenced Electrical Contractors Workforce

DER related regulations, policies and legislation should recognise the role licenced electrical contractors have in being at the forefront of electrifying the Greater Adelaide Region. We recommend licenced, trained and insured electrical contractors with a Cert 4 in PV and CEC Accreditation are used to install the following in residential and commercial residences:

- Solar PV installations
- Smart meters (to replace traditional meters)
- Secondary settlement points
- Home batteries
- Comprehensive versions of BESS

Utilising the electrical industry for electrifying the Greater Adelaide Region will assist in reducing connection times, improve consumer experience, reduce smart-meter roll out costs and help facilitate a swifter transition to a responsive electricity grid that can take advantage of DER policies.

Infrastructure Utilisation

Existing Regional Development

We support the Commission's intention where development "in established areas [are to] focus growth on locations with existing infrastructure capacity[7]". DER can utilise existing transmission structures which the community has cumulatively paid for over the last century, relieving the need to invest in as many mega generation and transmission projects.

DER aligns with "the Commission's view … that general infill needs to be better targeted to areas with infrastructure capacity, and areas which would benefit from renewal and greater housing choices"[8]

New Development Areas

We agree that we "need to carefully plan new development areas as they have a higher cost"[9]. MEA advocate that DER should be central to plans regarding energy supply for new development areas as this "infrastructure can be planned and augmented in a cost effective and orderly manner"[10]. DER will not only reduce emissions, but also decrease long-term energy bills and increase grid stability. The unique benefit of DER is its ability to directly source energy at the same site it will be utilised reducing the need to spend millions building major transmission and distribution networks in newly developed areas.

Workforce

The Commission recognises that for the Grater Adelaide Region to be a "prosperous economy requires [the State to] have employment land" that attracts "a skilled workforce and environment that are attractive for talented workers"[11]. While we recognise this is essential to incentivising skilled talent to relocate to the Greater Adelaide region, MEA highlights the current skills shortages being experienced all around Australia.

Currently the STEM (Science, Technology, Engineering and Math) Trades are suffering a skills-shortage crisis. MEA stresses the importance for the SA government to provide both short-term and long-term strategies to ensure a sufficiently skilled workforce is available to transition and maintain SA's electrified future.

Short-Term Workforce: Inter-State Qualification Recognition

MEA has made several submissions regarding the current disarray of inter-state qualification recognition of licenced electrical contractors. For a licenced electrical contractor living outside of SA to

[7] (n 1) 99
[8] *Ibid* 143
[9] *Ibid* 99
[10] *Ibid 99*
[11] *Ibid* 146

work in the Greater Adelaide region, they are required to complete more qualifications under SA regimes despite having equivalent qualifications in their residential State. This is a barrier to attracting a skilled workforce. With the goal of a "greener, wilder and climate resilient environment"[12] and a "strong economy built on a smarter, cleaner regenerative future"[13], SA needs to position itself to attract licenced electrical workers to action the Plan efficiently and swiftly. We recommend SA improving national harmonisation by allowing interstate qualified licenced electrical workers to perform work in SA without having to undergo unnecessary additional qualifications.

Long-Term Workforce: Vocational Education Training (VET) Education

To truly enhance a diverse range of skills in the local community, the Plan needs to think beyond improving physical infrastructure. MEA are strong advocates that integrating and streamlining VET courses within the secondary school curriculum is the key to addressing the STEM Trades skills shortage Australia is currently facing.

Secondary school facilities need to be designed to have spaces designed for training in STEM trades. For example, schools should have spaces with switchboards, targeted at providing a space for students wanting to pursue a career in the electrical industry. Secondary schools are currently significantly focused on ATAR results therefore restricting learning space facilities to academic subjects. For SA to develop a skilled workforce in STEM trades to continue facilitating an electrified community in the greater Adelaide Region, it needs to turn its attention towards developing the labour force now. The Plan provides significant opportunity for Adelaide to develop educational spaces which encourage and foster development in STEM trades to remain "ambitious [and innovative]"[14].

[12] (n 1) 170
[13] *Ibid* 170
[14] *Ibid* 68

Conclusion

To achieve SA's targets of 100% electrification by 2030 and net zero emissions by 2050, MEA strongly advocate that polices are implemented to utilise DER infrastructure as a mitigating action against climate change.

We are expecting to see significant development in the grater Adelaide region over the coming 30 years. Policies should mandate new builds to be 'DER friendly' through rooftop solar PVs, secondary settlement points, smart meters and EV bi-directional charging infrastructure. Legislating these requirements will move the greater Adelaide region away from fossil fuel.

When utilised in combination with Time of Use tariffs, Home Battery Storage and Home Energy Maintenance Systems, consumers are incentivised to source their own energy through DER and store it until peak demand time. They are faced with the choice to utilise the energy to avoid paying high prices or send back to the grid to receive rebates. These financial incentives will alter consumer behaviour thereby inherently reducing carbon emissions.

With the anticipated uptake of EVs over the next 10-15 years, there is going to be a greater need to integrate bi-directional charging infrastructure within residential and commercial premises. Not only will this reduce demand pressures on the grid, but will also act as easily accessible home battery units. Introducing EV bi-directional policies is the sensible solution to easily foreseeable grid stability and charging capacity issues.

MEA emphasises the vital role licenced electrical contractors have within DER integration. It is an underutilised workforce with the necessary base skills to perform these functions. The industry will assist with accelerating the roll-out of DER infrastructure and should therefore be given regulatory recognition. To give SA the best chance at minimising the negative consequences of skills shortages, we urge the State to reduce inter-state qualification requirements to allow qualified licenced electrical workers from other jurisdictions to assist in electrifying SA. The Plan also needs to ensure newly built secondary schools are designed to support practical VET courses which allow engagement and training in STEM trades to be fostered, ensuring SA continues to have a skilled workforce to maintain a continuing electrified region.

MEA look forward to seeing the future of the greater Adelaide region and hopes to have provided valuable insight towards the benefits of legislating DER infrastructure to achieve 100% electrification and net zero emissions.

DTI:PlanSA Submissions

From: Norman Etherington [redacted]
Sent: Friday, 27 October 2023 11:11 AM
To: DTI:PlanSA Submissions
Subject: National Trust 50 Year Plan

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50 Year Plan for Metropolitan Adelaide_v4.pdf

Dear Planning Group
In preparation for this year's revision of the 30-year plan, the National Trust of South Australia developed a 50-year plan for Metropolitan Adelaide.
I submit it with the expectation that you will give it careful consideration.
Sincerely,
Professor Norman Etherington AM

A 50 YEAR PLAN FOR METROPOLITAN ADELAIDE

Norman Etherington

NATIONAL TRUST
South Australia

The National Trust 50-Year Plan was written by Professor Norman Etherington, in consultation with the members of the Trust's Cultural Heritage Advisory Committee. Thanks to their advice over a two-year period, errors were avoided and many improvements incorporated in the final draft. Thanks also go to graphic designer Tracy Kenworthy.

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PART 1: VISIONS

I

Make no little plans; they have no magic to stir men's blood and probably themselves will not be realized. Make big plans; aim high in hope and work, remembering that a noble, logical diagram once recorded will never die, but long after we are gone be a living thing, asserting itself with ever-growing insistency. Remember that our sons and our grandsons are going to do things that would stagger us.

Daniel Burnham (1846-1912) American Architect[1]

1 *Though the time and place of Burnham's statement have not been precisely pinned down, there is no doubt of the authenticity of his sentiment. See Patrick T. Reardon, 'Burnham Quote: Well it May Be', Chicago Tribune, 1 Jan 1992.*

Introduction

'Make no little plans' is probably the most quotable quote in the history of city planning. Adelaide began with a very big plan by William Light, which Ebenezer Howard made famous in his influential book, *Garden Cities of Tomorrow (1902)*. The idea of the city in a park still has the power to stir our blood, as witnessed by the inclusion of Light's plan on Australia's National Heritage Register. But few in the succeeding centuries has matched his vision. For four brief years from 1916-1920 Charles Reade enthralled South Australians with his bold proposals for a second ring of parklands and a Torrens River linear park until the property industry rose up and gutted the town planning and development bill which would have put his vision into practice.[2] Reade departed and with him, his big ideas. In 1970 a professor of history, Hugh Stretton, pointed out that fortuitously Adelaide had grown along transport routes in a way that made it suitable for the development of a linear city along the lines developed by Europeans at the end of the 19th century. Since his time, however, plans for metropolitan Adelaide have become steadily smaller. The current *30-Year Plan for Greater Adelaide* (2010 with subsequent updates) is full of little plans, is notably lacking in 'magic to stir men's blood' and appears to have had zero impact outside our state.

The National Trust of South Australia believes it is time once again to lift our eyes and reach for the stars. Five years, ten years, even 30 years is too narrow a horizon. Big plans take time to come to fruition, so we invite you to imagine what could be accomplished in 50 years by an energised citizenry capable of holding its nerve – resistant to the shifting currents of party politics, finance and capricious fashion. A 50-year plan must be above politics, lest a change of government sink it midstream. It will be both conservative and radical. It will not seek to transcend the limitations of earth, air, fire and water. It will aim to preserve the features of our metropolis that have stood the test of time, especially historic townscapes, beaches, parks and gardens. It will attempt no utopian makeover, because experience shows that only small transformations of the built environment are possible in established cities due to the limitation of public and private capital investment.

It will have the capacity to absorb a greatly increased population but will work just as well with low or negative growth. With each passing decade Adelaide will further differentiate itself from other great cities so that by 2070 it will be a place like no other, the pride of its residents, the envy of the nation and a coveted destination for international travellers.

Subsequent sections outline clear, simple steps that will take us there in the next 50 years. Very little if any of what follows is original. Some of the ideas were present at the inception of the South Australian colony. Others sprang from the fertile imaginations and common sense of people who watched the city grow. Many of them were put forward long ago but were never implemented and thus had to be rediscovered by subsequent generations. None are borrowed from other cities in Australia or overseas because imitation has never worked very well for us.

2 John M. Tregenza, 'Reade, Charles Compton (1880–1933)', *Australian Dictionary of Biography*, National Centre of Biography, Australian National University, http://adb.anu.edu.au/biography/reade-charles-compton-8166/text14275, published first in hardcopy 1988, accessed online 4 October 2019.

II

Geography is destiny

Earth, air, fire and water constrain our metropolis – limiting and directing what human intellect and resources can do. Textbook diagrams of city development are generally circular. From the city centre transportation networks radiate like the spokes of a wagon wheel delivering people and services to ever more distant suburbs. Our 50-year plan begins by acknowledging that Adelaide is nothing like a wagon wheel. Hemmed in by the Mount Lofty ranges and the sea the city looks much more like a parsnip, with plains steadily expanding outward from a narrow point at Sellicks Beach to the broad acres that lie between St. Kilda and Gawler.

That geography determines where rain falls, where streams run, and where periodic floods cause trouble. For the original inhabitants the land lay as it did because of the Dreamtime creatures who shaped its slopes and rills. Their work created innumerable sites of remembrance, ceremony and celebration. During the last decades of the 20th century we began to recognise these places with signs and markers. That project should continue in cooperation with Aboriginal elders.

Differently understood by European settlers, the natural landscape determined where they put houses, industries, roads, parks and gardens. They sought out the seaside and higher ground for views and clear air. They avoided wetlands and creek beds, fearing flash floods, bad smells and disease. The steep terrain and fire risk inhibited settlement on the nearby hills.





Further constraining factors identified in the last quarter of the 20th century are the threats of rising seas, extreme weather events and bushfires. While people differ on the reasons, practically everyone accepts the need to prepare for the effects of a warming climate. Hydrological projections indicate quite a lot of the existing city is likely to be under water as former swamps reassert themselves and the sea sends fingers of saltwater inland. Unless its defences are shored up, half the Adelaide Airport runway will be awash. Stormwater drains and outlets will need a general rethink, upgrading and in some places rebuilding.

BELOW: In the year 2100
Predicted Shoreline, Port Adelaide to Brighton.
Source http://www.ozcoasts.gov.au/climate/Map



Especially worrisome is the possibility that rising seas shrinks the Lefevre Peninsula to an unsustainable thin finger of land.



ABOVE: Very similar projection for 2100 by http://www.coastalrisk.com.au



ABOVE: Light's Plan showed the South Australia where, and where not to build.

Modelling of flood risks maps show, just how aware Colonel Light and the first European settlers were of the need to avoid risks posed by geography. On this 1838 map swamps and watercourses of all kinds are prominently displayed. No town acres are suggested for surveying or sale on the hills face of the Mt. Lofty Ranges.





LEFT: Maximum flood projections, 1st Creek to 5th Creek.
RIGHT: The same projections apply for the Southern and Southwestern Park Lands.

It has been fancifully suggested that Light drew the irregular jagged form of Adelaide's East Terrace in anticipation of Aboriginal attacks or an insurrection of angry settlers. The true explanation is revealed in the map of peak flooding of eastern creeks which neatly coincides with the line of East Terrace. [illustrative map]

The same goes for the Southern and Southwestern Park Lands.

As a result of these early precautions, very little of Adelaide's 19th-century built heritage is threatened by the warming climate. In contrast a succession of catastrophic bushfires illustrated the unwisdom of building on the hills face as historic mansions were destroyed.

For better or worse, the constraints of topography and climate rule out many possible futures. In a warming world, there must be no new development in sites threatened by rising seas, fire or flood. The National Trust's 50-year plan aims to work with rather than against these constraints.

III

Light's Vision of City in a Park



The park lands that ring the central city are routinely celebrated as a priceless asset, 'the crown jewels' of our city. On the other hand, from the time they were first laid out by Colonel Light, they have been pillaged and despoiled for profit.

The early Adelaide City Council sold the right to cut wood there, as well as to pasture and slaughter animals. The state government elected at the dawn of the 21st century introduced legislation with the announced purpose of safeguarding the Park Land forever from development – and then proceeded to transfer large tracts to private and commercial interests on what amounts to permanent tenure. Expressions of outrage from community groups such as the Park Land Preservation Association fall on deaf ears. From time to time the State threatens to seize control from the City Council to serve short-term political objectives. Adelaide aspires to be a world city while abusing its Park Land in ways that would never be allowed in New York's Central Park, London's Hyde Park, Sydney's Domain or Perth's Kings Park.

The formal squares of the city centre and North Adelaide, which in their original layout compare favourably with the Georgian squares of London and Dublin, have been carved up with roadways, which have a miniscule beneficial impact on traffic flows. In recent years they have been routinely defaced with temporary fencing to control paid access to events. They deserve better.

Preservation of the Park Lands as a public asset is the first item on this metropolitan plan for the next five decades.

A Landscape Master Plan prepared for the Adelaide City Council in 2011 sets out much of what a 50-year Plan ought to be.[3] It sensibly recommends the designation of places important to the original Aboriginal owners, as well as the retention of key natural and cultural heritage elements. It remarks correctly that 'This exemplar of Nineteenth Century town planning may well also satisfy the criteria for World Heritage Listing.' That would do a lot to kerb the eternal inclination of city and state governments to subordinate Park Land preservation to short-term political needs.

3 *Adelaide Parklands Landscape Master Plan*, Taylor Cullity Lethlean, 7 November 2011.

The National Trust Park Lands Policy does not descend to the detail of the Landscape Master Plan but goes further in some essential respects.[4] It asks for unnecessary roadways to be closed and for others to be either sunk or diverted on overpasses so that pedestrians, joggers, cyclists and casual visitors may enjoy unimpeded thoroughfares right round the parkland ring, as is done in New York's Central Park and other great urban parks. A visionary Master Plan prepared by one of the world's best landscape designers is what Adelaide has never had but desperately needs.

Outside government and commercial circles there is virtual unanimity on the main points of the 50-year Plan's requirements for the future of the Parklands:

1. **World Heritage listing following National Heritage Listing of the Park Lands. The present National listing of Light's diagram needs to be followed by listing of the actual landscape.**

2. **Formal adoption by the state government and adjacent local governments of a visionary Master Plan, with progress to be audited annually in a parliamentary report to the people.**

3. **Absolute prohibition against permanent alienation of Park Land for commercial purposes, including leases exceeding ten years. Any exemption must require the consent of both houses of parliament.**

4. **Development of a roadway and public transport layout that minimises impact on the Park Land.**

5. **Return of all the formal squares of the central city and North Adelaide to their original configuration.**

4 National Trust of South Australia, 'Park Lands Policy', June 2016. The policy originated in the last century and is subject to periodic review.

IV

Charles Reade's Vision for Outer Park Lands



Light's plan inspired Ebenezer Howard, British founder of the Garden City movement, who in turn inspired Charles Reade, Adelaide's first professional town planner. During his five years in Adelaide (1915-20) Reade put forward two great ideas. One was a second ring of park land and the other was a linear park running the length of the Torrens River from the sea to the hills.



Reade's proposed outer ring of parkland was a concept, rather than a plan, drawn as circle roughly 12 km. in diameter. Very soon new suburbs grew up which made it impossible, but the idea was too good to die.

In the 1980s the Torrens Linear Park plan was revived and opened to the public in 1997 (opposite).

In one big leap of imagination, the Department of Environment and Planning released a Mass Open Space Scheme Study (MOSS, 1987) which resuscitated and expanded Reade's concept of an outer Parkland belt on a grand scale. It proposed a Coast Park stretching from Outer Harbour to Sellicks Beach offering an uninterrupted path for walking and cycling. At various points the path is projected to intersect another park running along the Adelaide Hills face and Mount Lofty Ranges all the way to Gawler. It proposes green fingers of park stretching along waterways that would offer continuous pedestrian and bicycle access to the Adelaide Plains comparable to that afforded by the River Torrens Linear Park. Both Labor and Liberal governments have at various times endorsed the concept under different names. It continues to be mentioned in plans for Metropolitan Adelaide into the 21st century.





ABOVE: The MOSS plan for an outer ring of Park Land (Source: http://location.sa.gov.au/viewer/?map=hybrid&x=138.7731&y=-35.00912&z=10&uids=119)

Realisation of the plan has from the beginning relied on the state's Planning and Development Fund, a pot of money raised by allowing developers who cannot achieve the statutory minimum 12.5% of open space in new developments to satisfy the requirement through a proportional cash contribution to the Fund. The original idea was to make grants to local councils who would use it to acquire and propose management plans for sections of the Coast and Hills Parks. Gradually these would fit together like pieces of a jigsaw puzzle aligned with the city's parsnip-shaped perimeter.

It is, in Daniel Burnham's sense, a big plan. Great progress has been made in the Coast track, but the Mt. Lofty Ranges park remains largely conceptual. The aim should be to consolidate the entire area in a single National Park. Legislation should require an annual report to Parliament outlining what has been done in the previous year to advance the cause. Realisation of the outer belt of park land should always be the number one priority for distributions from the Planning and Development Fund. When accomplished and declared a National Park, it will be one of the urban wonders of the world.

The second priority should be the conversion of all the metropolitan watercourses to linear parks, excepting only those that have been irrevocably transformed into closed underground sewers. Gaps in the existing linear parks at Dry Creek and Salisbury should be brought to completion and the Sturt River restored from its present incarnation as a concrete ditch to a natural creek with associated wetlands at appropriate intervals.

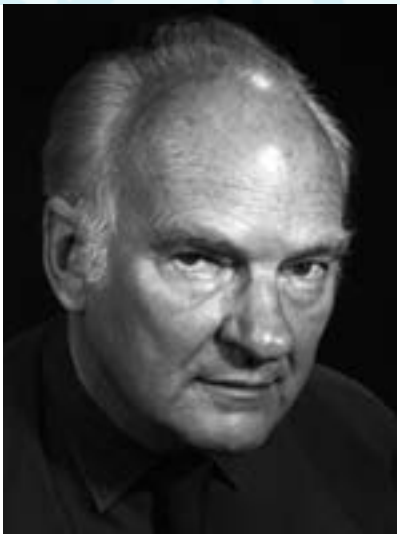
This makes environmental as well as social sense. In times of flood the established watercourses are our best defence against damaging floods. The Adelaide Botanic Gardens show what can be accomplished by working with rather than against them.



ABOVE: Potential linear parks

V

Coping with Growth: High, Low, and Negative



Hugh Stretton and the Linear City.

A professor of history at the University of Adelaide, Hugh Stretton thought planners had gone too far in copying the American radial city model which made practically everyone rely on cars for daily transport. The further out from the centre they lived, the worse people were served by essential services. He watched with rising alarm as the population boom was directed to the outer ring., which was both socially and economically inequitable. He was deeply impressed by the alternative model of the linear city espoused by Europeans at the turn of the 20th century. A city with significant centres dispersed along a high capacity transportation line would allow every citizen to live within easy reach of employment, recreation, community services and open space.

In Ideas for Australian Cities (1970) Stretton set out his vision of Adelaide as a linear city. He pointed out that in pursuit of industrialisation South Australian politicians and public servants had created a railway corridor stretching from Willunga to the Barossa that would deliver workers to their places of employment. The new city of Elizabeth showed how industrial workers could enjoy a quality of housing and access to essential services equal to that enjoyed by wealthier people near the Adelaide central business district. Although the reasons were hard-headed and pragmatic, they could serve a grander purpose.

> Viewed from above, the distance from Willunga to the northernmost industrial reservation beyond Elizabeth is forty-six miles [74 kms] as the crow flies, and not much further by rail or road. Most of Adelaide's industrial revolution is strung along that line and around the port triangle which is the only major digression from it – a short, self-reliant digression with its own centre, work and housing. ... the three ports, the industrial zones, the city and several district centres are spaced to allow the expansion of uncongested concentrations of activity around each, but are linked directly to each other by rail, road and services. The jet airport is centrally placed, three miles off the line, the charter and amateur airport, and the defence and experimental airport, are both on the line. On it or near it are most of the metropolis' jobs and most of its good low-cost houses. [pp. 167-8]

Imagine, Stretton asked, what could have been done with these assets.

> Suppose the Adelaide planners had somehow brought the rest of the metropolis into close relation with the industrial line, then the city in 1990 might have been forty miles by two or three, with five-mile bulges around its port, its old city, and one or two city centres developing on the southern reaches of the line. All the land along that line is workable and plenty of it is attractive. ... Consider the social and economic gains open to that long city. ... A linear Adelaide

> would already be enjoying some of them. It could be building its freeways cheaply, mostly on open land, disturbing nobody. A high proportion of the population could live in walking distance of a single efficient passenger line, which would soon justify [p. 169] reconstructions to allow rapid expresses and central city underground. There would be custom for two or three more Elizabeth-style town centres, each affording some relief to the roads and the city centre.... Dense housing could still be in reach of the things which make density tolerable: centres and countryside close by, and quick, open-country routes to the beaches and the hills. [pp. 168-9]

To Stretton's deep disappointment the planning system ignored the possibilities for the linear city, opting instead for radial suburban development of areas lying to the north-east and south that were poorly served by public transport and community services. New housing swallowed up land that ought to have been reserved for recreation. The railway reserve intended for new suburbs to the northeast was sold off for housing, leaving residents with long commutes to work along dismal roadways lined with fast food outlets, used car lots and the other retail detritus characteristic of American exurbia. The Elizabeth-style new town that might have been built on the rail line to Willunga was instead located at Monarto near Murray Bridge before being abandoned altogether when the Commonwealth government pulled the plug on finance.

It may be thought that after fifty years Hugh Stretton's concept would be remembered – if at all – as an intellectual curiosity. So much has changed. Population growth has slowed to a snail's pace. Families are different; so are education, industry and life expectancy. However, an unanticipated turn of events makes the linear city once more an attractive option. A lot of the manufacturing industry formerly served by the rail network has closed down. Vacated factory and warehousing sites have suddenly emerged as prime sites for new residential development.

Adelaide's urban rail network is an extraordinary legacy from a previous era of economic growth. It is also a grossly under-appreciated asset.

An example is the western side of Churchill Road between Torrens and Regency Roads. Apartment building of the 21st century ignores the forbiddingly fenced-off rail line, when it would have been easy to link it to strategically located stations, affording access to central Adelaide in under 5 minutes. In Hugh Stretton's day trains carried passengers from Willunga to Angaston. Short-sighted rail closures now restrict travel to points between Seaford and Gawler. There have been threats to transfer the transport system to private owners, which would foreclose possibilities for the linear city.

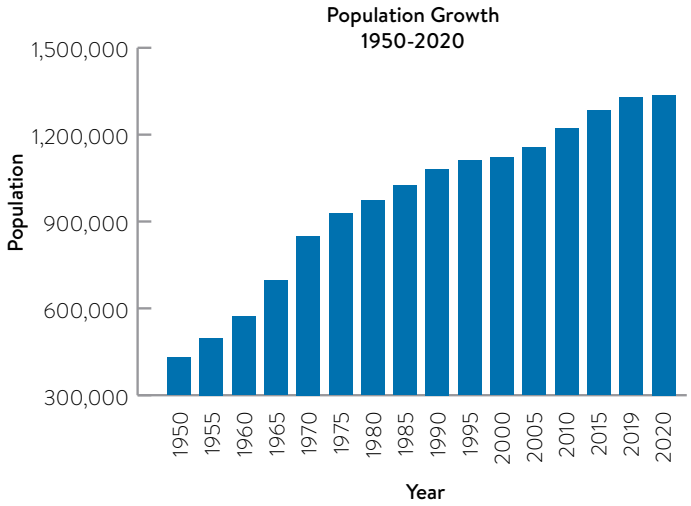
How we make use of that asset depends a lot on the size of the population it serves. That has been a subject of fierce debate.

Population growth scenarios

All government planning for Metropolitan Adelaide has been predicated on substantial increases in population – either by natural growth or design –for which new homes must be found. For the last 40 years planners, lobby groups, architects and developers have argued that urban expansion must stop somewhere and therefore 'infill development' will be the solution to population growth. They unfailingly advocate relaxation of planning regulations over height, density, building occupancy and heritage as the means by which the private sector can be incentivised to do the job.

The 30-year plan of 2011 considered growth to be both a necessity and a good. Even when growth failed to live up to expectations, the 2017 update continued to use a high-growth scenario on the ground that it was desirable. A Deloitte study ('Make it Big, Adelaide', 2016) commissioned by Business SA, the Committee for Adelaide, the Property Council and others displays the same fundamental contradiction: steps must be taken to accommodate the growth that hasn't happened.

The chart below shows how dramatically the rate of growth has slowed since the boom



Year	Population	Growth Rate (%)	Growth
1950	429,277	0.00%	
1955	497,246	2.98%	67,969
1960	571,822	2.83%	74,576
1965	696,809	4.03%	124,987
1970	850,095	4.06%	153,286
1975	928,600	1.78%	78,505
1980	971,834	0.91%	43,234
1985	1,023,736	1.05%	51,902
1990	1,081,585	1.11%	57,849
1995	1,111,665	0.55%	30,080
2000	1,121,573	0.18%	9,908
2005	1,154,863	0.59%	33,290
2010	1,221,639	1.13%	66,776
2015	1,283,805	1.00%	62,166
2019	1,328,119	0.85%	44,314
2020	1,336,403	0.62%	8,284

Source: http://worldpopulationreview.com/world-cities/adelaide-population/

What if the growth doesn't happen and the metropolitan population remains static or gradually declines? It is remarkable that no one asks what the implications might be for planning. A 50-year plan needs to be more than wishful thinking. It has deal to with all three possibilities: high growth, no growth, and shrinkage. Each of these scenarios can be effectively dealt with by a modified version of Stretton's concept of Adelaide as a linear city.

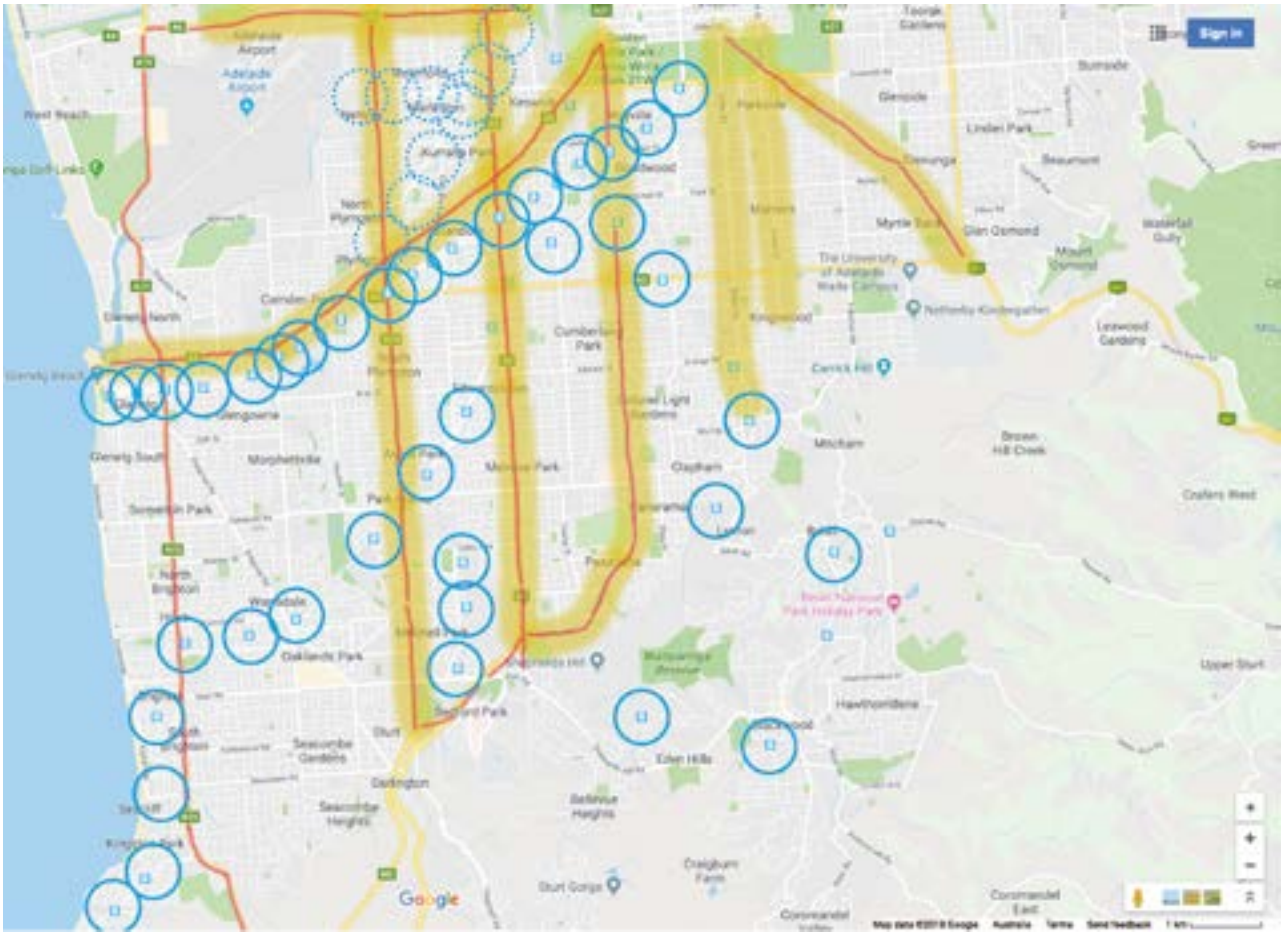
The high-growth model poses the biggest challenges to liveability, planning and infrastructure. So let us begin by asking the current question: how can significant population growth be accommodated?

High Growth

Twenty-first century versions of a plan for high population growth identified 'transport corridors' as the preferred conduits for high and medium-density development.

Government planners have been trying to put this theory into practice by pushing through development approvals for higher and denser housing along corridors specified by ministerial instructions and the State Planning Commission.

The assumptions behind these drastic changes to the planning regime do not stand scrutiny. Suppose, population growth returns to the 4% figure achieved in 1960-70: the only decade of the 20th century in which it surpassed 3%. Given the low rate at which unregulated infill development proceeds when driven by market forces, it is inconceivable that more than a tiny fraction of the required growth can be accommodated along transport corridors served by buses alone, even if they moved at 10-minute intervals. [See map next page] Even corridors served by all three public transport networks – train, tram and bus – cannot keep up with population growth if development is left to the private sector. Anyone who rides the rails can see that very, very little medium or high-density development has occurred along lines since the explosion of Housing Trust accommodation in the 1950s and '60s.



Blue circles show train and tram stations with 400m radius of each other.

Dashed blue circles show a potential new tram line with an airport spur.

Red lines show roads of 4 or more lanes.

Yellow shows corridors within 300 metres of bus stops on frequently serviced routes.

ABOVE: Transport corridors are useful when there is a choice of more than one means of transport. On this map of Adelaide south of the Central Business District illustrates the limitations of corridors served by only one or two means of transport. The Belair rail line is ineffective. So are the yellow bus routes lines along Unley Road and Duthy Street.



ABOVE: Red shaded areas are industrial sites adjacent to rail lines

Curiously, the cry for infill development has been most intense near the city centre where densities are already high and opportunities for increasing population are limited. For this reason many suspicious citizens conclude that the transport corridor scheme is a subterfuge for altering zoning in high value neighbourhoods to the advantage of developers. Most new development in those neighbourhoods has been 'one-for-one' replacement of single houses which does nothing to raise the population. Tellingly, the South Australian advocates of the transport corridors cannot point to any designated corridors anywhere in the world that do what they promise.

Apart from some impressive redevelopment of the old gas works and Clipsal factories at Bowden, astonishingly little has been done to realise the potential of the rail and tramway network – which is enormous. Sydney anticipates that within a few years the residential density at Green Park on the rail line to Mascot Airport will exceed that of Manhattan and Hong Kong. Adelaide could achieve similar results at several points along the existing rail system, provided that development is managed with that aim in mind. That means concentrating all high-density new residential building within easy walking distance of train and tram stations.

Market forces alone cannot do the job, even if planning permission is fast-tracked in the desired locations. Private developers will always seek to plant their towers in established neighbourhoods with high property values, tree-lined streets and handsome old buildings (Norwood, Unley, North Adelaide, etc). Those possibilities must be closed off. A government authority must guide the development of the linear city, not by mindlessly auctioning land to the highest bidder, but by acquiring derelict industrial sites and holding them expressly for the purpose of high-density housing set amidst attractive parks and gardens.

The finished product would be breathtaking.

Imagine gliding at high speed from McLaren Vale to the Barossa, passing *en route* along a thin but densely populated ribbon of high-density residential blocks. At Goodwood, some passengers would board the train from the spur lines to Belair and Flinders University. At Adelaide central station others would transfer to other lines running to Grange, West Lakes, Port Adelaide, Semaphore and Largs. It would not be overly costly to run a connection to Adelaide airport via the old Holdfast Bay rail line and Richmond Road (provided that the runway is shored up to withstand rising seas). Trams already carry alighting passengers to key CBD attractions (North Terrace, Rundle Mall, Town Hall and Central Market). High-rise apartments built along the rail lines and the north-south expressway would be highly desirable because of their ready access to all the urban pleasures of Adelaide, not to mention their sweeping views to the hills and the sea. In other Australian cities proximity to good public transport raises property values

This is not a utopian project. The rail network is already in place, thanks to visionary governments of the 19th and 20th centuries. Stations lie within easy walking distance of all our existing public hospitals, university campuses, major sporting complexes, cultural institutions and government offices. Rail allows easy access to beaches at Hallett Cove, Marino Rocks, Grange, Semaphore and Largs. It links the city to Hills National Park system at Belair. Tracks still run to Angaston. Although the old Willunga line has been torn up, plans exist for extending tracks from Seaford to the

fringes of McLaren Vale. What is more, the rail network aligns itself neatly with the major motor ways of South Road, Anzac Highway and Port Road. That means that residents of future high-density developments will have an à la carte menu of transport options, including buses and cars.

This is not the linear city of Stretton's dreams, with open space on both sides of a dynamic transport corridor. It takes the modified form of a spine of highly desirable high-density living traversing suburbs built after World Wars I and II. No one would now wish to revive Stretton's plan for a new town at Willunga. McLaren Vale and the Barossa Valley are rightly destined for protection against suburban development. On the other hand, there would be huge public interest in daily express rail services to and from the wine districts.

'Save Our Suburbs'

Vested interests often argue that the only way to deal with increased population without intruding into surrounding agricultural land is by scattering higher-density development through existing suburbs. This alleged alternative often goes by the name of urban consolidation. As originally envisaged in the late 1970s, urban consolidation proposed to increase densities in 'middle ring' suburbs by encouraging additional building through subdivision or rezoning of large blocks. The pitfalls of the policy were comprehensively detailed by Patrick Troy's 1996 book, *The Perils of Urban Consolidation.*

By the early 21st century the policy had been perverted into an argument for medium and high-density 'infill' development in the most attractive inner suburbs. State governments overrode the resistance of local councils by declaring projects costing more than $10m to be 'of state significance'. Watching with consternation as historic precincts were invaded by grossly overblown development, community groups such as 'Save our Suburbs' attempted to turn back the tide. They in turn were denounced as NIMBYs (Not in My Back Yard) by the property industry for thwarting worthy objectives such as architectural diversity, 'affordable housing' and a lively urban café culture. In fact, relaxation of planning controls in the city centre and adjacent suburbs delivered none of the promised benefits. Developers, it turned out, did not want to increase population density or affordable housing through medium and high-rise building. They showed no interest in rundown neighbourhoods in unappealing locations. They wanted to build very expensive large apartments and units for cashed-up buyers who coveted the life-style of the wealthier suburbs. The paradoxical outcome was that they threatened to destroy the scale, historic integrity and amenity that had attracted their attention in the first place. In Adelaide as in other old Australian cities, the specious arguments of the urban consolidators threatened to bulldoze irreplaceable heritage of colonial and federation domestic architecture for no good reason.

The reimagined linear city – intensive development on former industrial sites served by road and rail – is the means by which a greatly increased population can be achieved without needlessly destroying established neighbourhoods of historic charm. It will also be welcomed by people in middle and outer suburbs who like their way of life and resent having it rubbished by the elitist advocates of urban consolidation who speak approvingly about the death of the quarter-acre block. Without rapid transport, most of these suburbs will remain car dependent (even if the cars are not personally owned or driven). Relieved of development pressure, the major roadways could be gradually redeveloped as green motor parkways.

No Growth

From a practical standpoint, no growth implies little new housing. Experience tells us, however, that politicians and lobby groups will go on insisting that a growth spurt is just around the corner or that desperate measures are needed to attract growth. When economic growth falters the same special interests invariably argue that relaxation of

planning controls will generate jobs through new building – even though there has never been a planning permission-led recovery, and the bureaucratic obstacles to building reached a historic low in the early 21st century.

To prevent irreparable damage to the most liveable neighbourhoods, it is necessary to anticipate these arguments and propose alternatives. The modified model of the linear city based on existing rapid transit networks provides the best counter argument. Building a land bank of state-owned former industrial sites buys insurance against any unexpected developments. If growth stands still the land can be gradually released for medium-density housing around stations interspersed with attractive parks and recreational facilities.

With that insurance in place it should be much easier to protect the Adelaide Park Lands, the Hills Face, beaches and historic conservation zones.

Shrinkage

South Australian planners have always taken the view that population growth is both essential and inevitable. However, examples from around the globe demonstrate that shrinkage happens.[5] At the national level Italy, Japan and other developed countries will lose people over the next fifty years. The populations of many well-known cities in the United States collapsed in the closing decades of the 20th century, some by as much as 50%, even as the national population grew. Shrinkage is particularly associated with the kind of deindustrialisation experienced by Adelaide as automotive and other manufacturing enterprises shut down.

Due to high levels of immigration Australia experienced a growth spurt in the early 21st century, but most of the new arrivals went to Melbourne, Sydney and southeast Queensland. Efforts to force immigrants to settle in regional centres bore little fruit. Much of the industry that powered Adelaide's mid-20th century boom closed down. Head offices moved interstate. Employment in agriculture and mining declined as machines did more of the grunt work. There's no point just hoping that 'something will turn up' to restart the growth engine. What do we do if the population declines?

Don't panic or despair. Thoughtful people argue that humankind must sooner or later face up to the limits of growth on this planet. Under the right conditions population decline can set the stage for regeneration. Rome, Venice, Bath, Vienna, and many other famous cities profited from decline by turning their unique cultural assets into drawcards.

The city of Leipzig in Germany provides an example of how good planning can manage decline. From a peak population of 713,000 in 1933, the city shrank to about 437,000 in 1998. World War II bombing, forty years of communist rule and the strains of German reunification delivered a series of shocks unlike any experienced in Australian cities. In 2000 Leipzig set out to plan a road to recovery. The council recognised that the prevailing planning regime was not up to the task:

> Classic land use planning plays only a subordinate role in the process of urban redevelopment. Far more important are an extensive cooperation between public authorities and private initiatives, the development of flexible concepts and means and the controlled use of public resources.[6]

Government assumed a leading role in land use planning. The highest priority was preservation of 'buildings and neighbourhoods from the Gründerzeit, or Foundation Era in the late 19th century' when German unification set off an era of rapid industrialisation. Homes and buildings from this era constituted a large percentage of the city's housing stock and possessed an attractive architectural unity. Other districts where buildings constructed under the East German communist regime had been

5 Cristina Martinez-Fernandez, Ivonne Audirac, Sylvie Fol And Emmanuèle Cunningham-Sabot, 'Shrinking Cities: Urban Challenges of Globalization' *International Journal of Urban and Regional Research (2012) 36: 213-25.*

6 City of Leipzig, Residential Space and Urban Renewal, www. https://english.leipzig.de/construction-and-residence/urban-development/residential-space-and-urban-renewal/. Accessed 13 Dec. 2019.

neglected or abandoned, were destined for comprehensive demolition and renewal. Large strategically positioned tracts of land were earmarked for redevelopment as parks and gardens.

Adelaide escaped the disasters that afflicted Leipzig, but can take lessons from the Germans on how to manage a stable or shrinking population. There is much to gain from deciding what to keep, what to throw out and what to renew.

Like Leipzig, Adelaide retains a treasure trove of nineteenth-century building – thanks to the wool, wheat and mining booms that led up to Australian Federation. The loadbearing stone and double brick buildings of that era constitute an irreplaceable heritage quite as important to world history as Leipzig's Grûnderzeit. They deserve comprehensive protection. The historic conservation zones established at the turn of the 21st century cover a fraction of the areas requiring demolition control. In an era of declining population there can be no compelling case for their displacement by new building. In any event Adelaide must avoid the madness that gripped Hobart in the 1970s and 80's when fear of stagnation saw Georgian villas give way to car parks. The greater the likelihood of population decline, the greater is the necessity for historic preservation.

Fortunately, Adelaide has very few neighbourhoods blighted by overblown housing projects. Where buildings stand empty it is generally because owners hope to make a killing through redevelopment when the time is ripe. Such urban blight as does exist is often the result of poorly thought-out changes in planning regulations governing height and bulk, which make displacement of low-rise buildings a profitable business. It can take decades for the cycle of decay, demolition and new building to restore life to those streets.

A shrinking city must at all costs avoid the destructive speculator who demolishes serviceable buildings and then puts nothing in its place. It is not enough to make demolition approval contingent on planning approval for a replacement building. The speculator must post a substantial bond that will be forfeited if no construction has commenced within three years.

What of the former industrial areas along the railway lines? In a high growth scenario they are best used for high and medium housing. That would still be good policy even if the population plummets because of the increased quality of life residents could enjoy. But there would be no urgency. An alternative would be to use a state-funded landbank to create parks adjacent to residential communities. This would be especially desirable for historic districts such as Alberton, presently sandwiched between ex-industrial sites on Port Road and the Port rail line.

In the absence of population pressure, priority could be given to restoring all the original watercourses shown on Light's plan through acquisition of adjoining properties that prevent continuous access along linear parks. Restored wetlands at the Botanic Gardens and along the Torrens and Sturt rivers show what amazing results can be achieved.

When population shrinks planning rules can provide more certainty for citizens, owners and developers. Great cities such as Paris and Amsterdam have shown how setting rules *and sticking to them* can create urban beauty that grows with every passing generation.

This need not rule out radical experimentation and innovation. There are plenty of areas where no particular amenity or historic character merits preservation that could be exempted from normal planning regulations, subject only to the requirements of public health and safety.

There are, in addition, a great many suburbs where planning can be devolved almost entirely to local government. Let these citizens decide, as they used to, what they want for their neighbourhoods. Experience shows there are many worse devices than democracy for building attractive and liveable communities.

VI

Imagination and Innovation

A widespread misconception holds that city plans inhibit innovation by imposing a straitjacket of regulation. In respect to some essentials regulation must be clear and firm. Everyone recognises the need for fire-resistant buildings, adequate sewerage, storm water management, coast protection, hazard reduction, traffic management, etc. Most South Australians also support clear rules for protection of parklands, heritage buildings and historic precincts. Beyond these basic requirements Adelaide, like any other great city must have room to adapt to unforeseeable events, new technologies and opportunities. Nothing in this plan constrains our ability to respond to the challenges of the future.

There may be some point in going further by designating certain regions and neighbourhoods as explicitly friendly to experimentation and innovation. There are places where building dense and tall will offend no one. South Australia could certainly use a lot more imagination in building and house design. In the designated areas shoddy, unimaginative and dull design could be penalised; excellence and radicalism, rewarded.

Because we cannot know precisely how the city will develop over the next fifty years we must hang onto all our irreplaceable assets. Australians now realize the mistake they made by ripping up tram and train lines in the 1950s, thinking that cars and buses would crush all competitors. It is now too late and far too expensive to bring the old lines back. Many cities have found that bringing back street cars actually increases congestion. This would surely be the case if Adelaide ran tracks up Prospect Road and Norwood Parade, as a previous government proposed to do. The public transport system we cannot do without is the one we did not tear up: heavy rail. No technology on the horizon, real or imagined, threatens to outperform it in Adelaide.

Only trains have the demonstrated capacity to move more people faster because they travel on single-purpose corridors unimpeded by traffic lights or other obstacles. Due to expense the time has passed for an underground system like those built when London, Paris and New York were about the size of present-day Adelaide. Sydney and Melbourne struggle to pay for the expansion of their metros. It is therefore imperative that the South Australian government continue to own and operate the rail system, not just for transport, but also because it needs to control development on either side of the tracks. Western Australia and New South Wales turned former railway workshops into very successful public arts precincts. Adelaide, which transferred the old Islington works to private owners, got a sprawling ‘big box’ shopping centre.

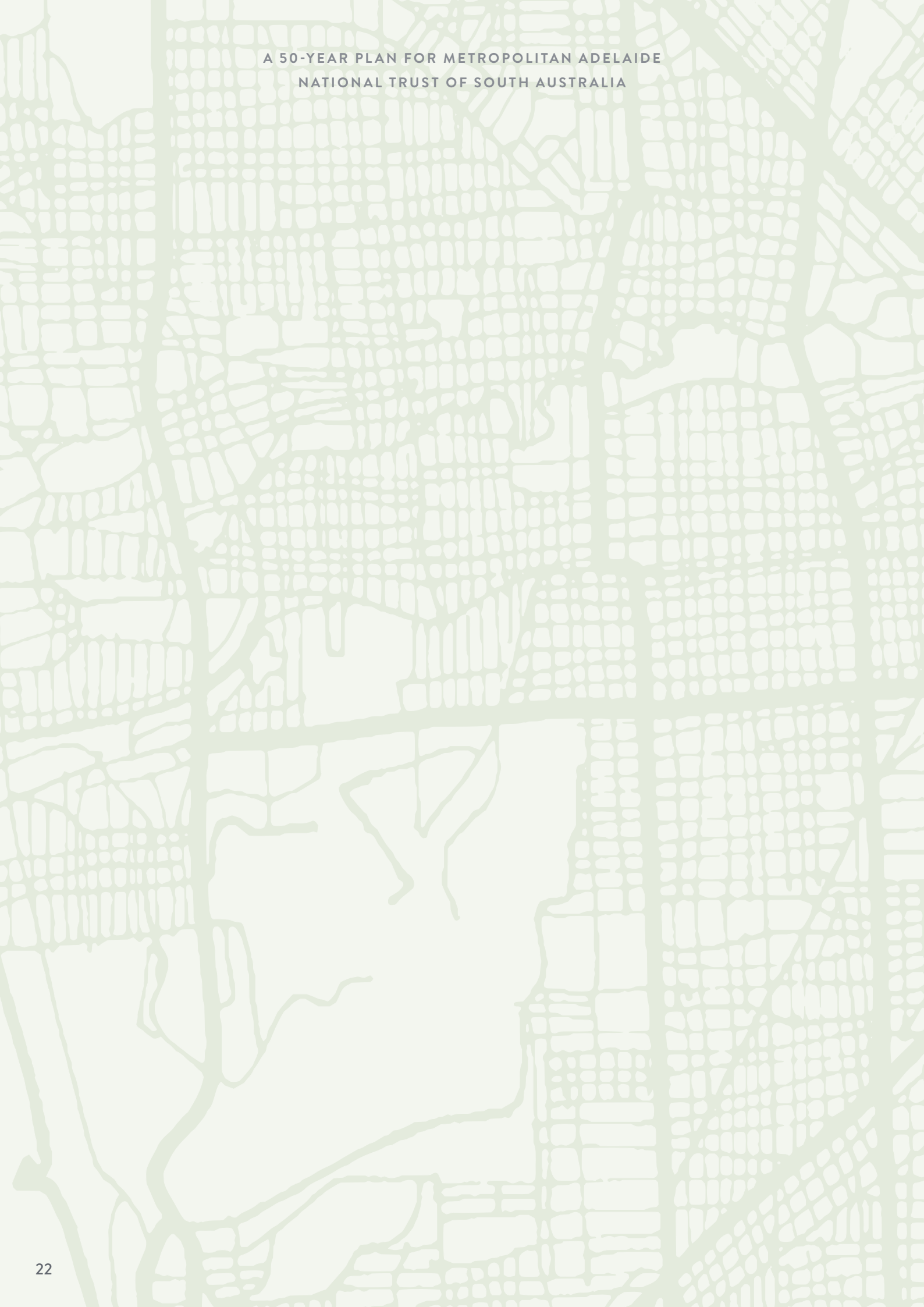
As we have seen, in both high-growth and low-growth scenarios, the rail lines remain what Hugh Stretton perceived them to be in 1970 – the best hope for housing large numbers of people in close reach of essential services, entertainment and open space.



Real innovation depends on original thinking. In the 1880s businessman and philanthropist Thomas Elder saw that a weir on the Torrens would create an unparalleled site for public recreation as well as an instrument for flood control. A century later South Australians grew envious of the waterside developments in Brisbane, Melbourne and Sydney, where the container revolution in shipping technology left swaths of dockside property surplus to industry requirements. Misconceiving cause and effect, Adelaide embarked on a drive to make Elder's park into a 'Riverbank Precinct'. The result is a less lively, less used, less attractive stretch of parkland lined with convention and hotel facilities that contribute nothing to city living.

Colonel Light had a more original idea for waterway development. Noting that the stretch of land between central Adelaide and Port Adelaide was as flat as any urban terrain he'd ever seen, he proposed digging a canal to connect the two. It could still be done. Think of the development potential and the public benefits.

The possibilities for innovation in a 50-year plan are limited only by of the human imagination.



PART 2: PLANNING TO MAKE THE VISION REALITY

The National Trust claims no particular planning expertise beyond our decades of work on heritage places. For that reason this section simply outlines the steps required to translate a 50-year vision into reality.

2020-25

1. **Secure bipartisan support for the plan** from community organisations, local government and major political parties.
2. **Commit government** – state and local – to the 50-year plan through binding resolutions.
3. **Draft appropriate enabling legislation** for adoption by state Parliament.
4. **Commission a survey of existing urban waterways** to establish the extent to which any or all may be returned to something like their pre-colonial condition. The survey should also identify the properties that would need to be acquired to accomplish the task along with an estimate of costs. Publish the survey and seek public comment.
5. **Commission an urban rail transport consultant** to recommend improvements and extensions required to bring the rail system up to the highest standards of performance. This should include the costs of a spur serving the Adelaide airport and conversion of metropolitan sections of the Adelaide-Port Augusta rail line.
6. **Commission new master plan by internationally renowned experts** on Adelaide City Park Lands and Squares. Conduct a community consultation on the completed plan, and make any necessary adjustments. Submit plan for ratification by Parliament, the City of Adelaide and adjacent councils.
7. **Publish details of properties to be acquired** in order to complete second belt of Park Land (Metropolitan Open Space System), along with projected time frame.
8. **Commence acquisition of strategic properties** along urban rail and tram lines.
9. **Complete coastal pedestrian** and bike path.
10. **Gather submissions** from local councils on new heritage conservation zones that deserve to be declared and protected by the State Planning Commission.
11. **Test public opinion** on building Colonel Light's proposed canal from Port Adelaide to Mile End. If favourable, commission a feasibility study.
12. **Identify areas where medium and high density development should be encouraged** and where it should be prohibited for the duration of the 50-Year Plan.

2026-30

1. **Commence required work** on urban waterways and associated linear parks, including completion of those begun in previous decades but which remain unfinished.
2. **Commence remedial and new work on urban rail lines** in accordance with priorities recommended by consultants. Establish budget for annual appropriations and land acquisition.
3. **Restore Adelaide park squares** to the configuration shown on Light's plan.
4. **Commence implementation of Adelaide Park Land master plan** in accordance with the timeline set down for 2020-2070.
5. **Continue to acquire properties in the Adelaide Hills** for the outer belt of Park Land. (Metropolitan Open Space System).
6. **Complete designation of urban heritage and conservation zones** with special attention to surviving buildings of 1836-1918.
7. **Commence development of former industrial sites** acquired in accordance with the plan.

2031-36

1. **Publicise progress on the 50-year Plan** as part of bicentennial commemoration of the founding of South Australia.
2. **Continue work on urban waterways and linear parks**, combined with a reassessment of projected effects of climate change.
3. **Commence extension of urban rail network** to more distant stations.
4. **Designate completed adjacent parts of the outer Park Land belt as a single National Park.** Continue acquisition of properties required for its completion as far north as Gawler and a far south as Sellicks Beach.
5. **Continue implementation of the Adelaide Park Land Master plan** as per schedule of works.
6. **Continue development of former industrial sites** acquired along the rail and light rail lines.
7. **Assess progress of the heritage preservation programme** and make any required amendments.

2037-50

1. **In 2045, the midpoint of the 50-Year Plan, comprehensively review the plan** in light of unforeseen events, challenges and opportunities. Revise the plan accordingly.
2. **Continue work on urban waterways and linear parks,** combined with a reassessment of projected effects of climate change.
3. **Commence extension of urban rail network** to more distant stations.
4. **Designate completed adjacent parts of the outer Park Land belt as a single National Park.** Continue acquisition of properties required for its completion as far north as Gawler and a far south as Sellicks Beach.
5. **Continue implementation of the Adelaide Park Land Master plan** as per schedule of works.
6. **Continue development of former industrial sites** acquired along the rail and light rail lines.
7. **Assess progress of the heritage preservation programme** and make any required amendments.

2050-70

1. **Complete all unfinished parts of the plan.**
2. **Prepare a new 50-Year plan for 2070-2120.**

DTI:PlanSA Submissions

From: Jane Crosby [redacted]
Sent: Monday, 6 November 2023 4:23 PM
To: DTI:PlanSA Submissions
Cc: Jane Crosby
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Nature PlaySA Submission to Greater Adl Plan discussion paper Oct 2023.pdf

> You don't often get email from [redacted] Learn why this is important

Hello

Please find attached a submission from Nature Play SA as part of public consultation on the Greater Adelaide Regional Plan Discussion Paper.

Thank you for the opportunity to provide feedback.

Ngaityalya (Thank you)

Jane Crosby (She/Her)
General Manager, Nature Play SA
On Kaurna Country
[redacted]
www.natureplaysa.org.au

Nature Play SA is located on Kaurna Country. We acknowledge the Traditional Custodians of Country throughout Australia and recognise their continuing connection to lands, waters, skies and communities. We pay our respect to Aboriginal and Torres Strait Islander Elders past, present and emerging.

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Nature Play SA
Connection • Wellbeing • Belonging

Craig Holden
Chair, State Planning Commission
plansasubmissions@sa.gov.au

Dear Mr Holden

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to provide a response to the Greater Adelaide Regional Plan Discussion Paper. I would like to congratulate the Commission and the Planning and Land Use Services team for preparing such a comprehensive Discussion Paper and providing an inclusive and generous consultation process.

Nature Play SA is a leading not-for-profit organisation that inspires the South Australian community to engage with nature in creative, sustainable, and meaningful ways. Our core belief, supported by comprehensive research, is that spending time in nature supports wellbeing and fosters deeper connections with the environment and ourselves. Each year we work with more than 100,000 students, families and learning providers and through our collaborations we are growing community understanding of ecological concepts, Aboriginal cultures, sustainability, nature's intrinsic values, and respect for all living things. Through our work we are fostering environmental stewardship for future generations.

We believe we have a moral responsibility to care for our natural environments and everything we do today, matters for our collective wellbeing tomorrow. Planning and development growth must be guided by best-practice environmental and cultural management to ensure the wellbeing of communities and landscapes that we all depend upon. We believe there is enough compelling evidence to demand a greener, wilder and climate resilient environment as a matter of urgency, especially when we have the technology to forecast how sustainable growth will benefit our society, economy and environment.

After reviewing the Discussion Paper, we offer our feedback on consultation questions that are of most relevance to our sector.

Discussion Paper Question: What do you think of the four outcomes guiding how Greater Adelaide should grow?

We support the four outcomes as they all depend upon increased environmental protection to guide growth:

- A greener, wilder and climate resilient environment
- A more equitable and socially-cohesive place
- A strong economy built on a smarter, cleaner, regenerative future
- A greater choice of housing in the right places

Liveability, climate adaptation and biodiversity protection are interconnected and woven through these four outcome areas. They are also critical factors that will ensure the wellbeing of communities and the liveability of Greater Adelaide. This liveability factor is celebrated by state and local governments, recognising that the central pillar of global liveability rankings is access to healthy natural environments.

"Living locally" as a concept would benefit from stronger state and local government investments in high quality, accessible open spaces to connect communities with nature and with each other. It may help to increase open space targets and strategically invest in areas of disadvantage. Connecting disadvantaged communities in the Greater Adelaide region with high-quality open space is critical, with ABS 2021 Census data highlighting the disturbing jumps in mental health problems in suburbs with less access to nature.

Discussion Paper Question: What other major trends and drivers might shape the future of Greater Adelaide?

Supporting the wellbeing economy through the planning sector could showcase South Australia's leadership. Such an approach is reflected in the South Australian Government Economic Development Statement with a vision 'for an economy that is fit for the future, improving the wellbeing of all South Australians.' With a new Greater Adelaide Regional Plan establishing a vision for the region to 2051 and beyond, the wellbeing of people and environment should be the frame for land use growth and supply. Integrating intergenerational wellbeing into the planning system would be a contemporary way to measure growth.

Today's younger generations will be most affected by the Greater Adelaide Regional Plan and we congratulate the Commission and other stakeholders for leading Youth Forums to listen to younger people's concerns and aspirations. As future leaders of the region their contributions are vital. According to reports from the South Australian Commissioner for Children and Young People, children in South Australia see the degradation of the environment as a huge threat to their future[1] and it is estimated that of the overall levels of mental illness experienced in adulthood, more than 50% is likely to have begun sometime before the age of 14 years.[2] These statistics are of deep concern, and they are interlinked.

Nature and climate related legal duties (avoiding impacts and risks), regenerative design, nature deficit disorders, wellbeing, youth advocacy, ageing populations, technology and healthcare infrastructure (including preventative infrastructure such as open spaces) are additional trends to consider.

We are pleased to see that 'A more equitable and socially cohesive place' is an outcome, with greater protection of Aboriginal heritage an important part of this. This goes beyond Native Title considerations and looks towards achieving Aboriginal peoples social, cultural and economic aspirations through genuine engagement and listening. Collectively we all have a responsibility to care for Country (including land, waterways and skies) for future generations, with Aboriginal peoples having cultural responsibilities that are timeless - and that we can all learn from. Aboriginal leadership should guide all regional planning processes.

Discussion Paper Question: What are the most important factors for the Commission to consider in meeting future demand for open space?

Future demand for open spaces and protected areas will rise sharply, with communities feeling the impacts of climate change while adapting to new forms of housing with less private open space. Large open spaces are needed for all age groups to enjoy. Community concern and advocacy about climate change will demand more from State and Local Governments, including transparent reporting about investments in open spaces to enhance, maintain, increase and protect them.

We know that open spaces benefit local communities and broader regions – supporting health and wellbeing, protecting biodiversity and creating places that people want to visit and protect. Building on COP15 commitments, a new nature valuation approach and narrative needs to be developed. This should incorporate cross-sector expertise and recognise the higher and better use value of open spaces, making sure planning and development operates within natures boundaries.

[1] https://www.ccyp.com.au/wp-content/uploads/2022/01/What-SA-Kids-Have-Told-Us-About-Climate-Change.pdf

[2] https://www.ccyp.com.au/wp-content/uploads/2023/10/Screen-%E2%80%93-Issue-Brief-Developing-a-fit-for-purpose-mental-health-care-system-for-CYP.pdf

Discussion Paper Question: What are the most important factors for the Commission to consider in reviewing and achieving the Urban Green Cover Target?

People and wildlife need more urban green cover for their health and wellbeing. Mapping the existing green cover, setting ambitious targets, public annual reporting and a clear accountability framework may improve urban green cover. In addition, we need to collectively understand the economic value of green cover and new nature accounting frameworks. Additional tools that may assist include heat mapping tools, increases to mandatory tree planting policies, penalties for tree removal/loss of green cover, greater protection for significant trees, heat hazard overlays and higher mandatory standards for developments that reduce urban heat.

Green Adelaide's leadership developing the Urban Greening Strategy will be an important tool to maintain liveability and wellbeing. However, while improvements in green cover may benefit from community education and guidance, stronger rules and standards are needed to meet targets.

Encouraging developers and residents to deliver biodiversity and water sensitive urban design, and exploring new partnerships may help to unlock incentives for demonstrations of urban green cover leadership (for example, rates, water or electricity reductions). Thinking creatively about types and locations of urban green cover may also unlock new opportunities. For example, opportunities to wild schools and create outdoor learning environments, greening infrastructure projects, health services, cemeteries, industrial and urban heat zones. Promotion of local species and drought tolerant plants can also encourage a more sustainable canopy, while continuing to protect largescale nature corridors within our urban environments.

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper. The Nature Play SA vision is to inspire the South Australian community to strengthen their wellbeing and connection with nature and we look forward to supporting initiatives that will encourage increased open space and green cover, protect biodiversity and ensure a climate resilient Greater Adelaide Region for the wellbeing of future generations.

Ngaityalya (Thank you)

[redacted]

Jason Tyndall
Chief Executive
Nature Play SA
[redacted]

6 November 2023

From: [redacted]
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 12:53:42 PM
Attachments: image001.jpg
image002.png
image003.png
image004.png
image005.png
image006.png
Submission - GARP Discussion Paper - November 2023.pdf

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Good afternoon,

Please find attached PIA SA's Submission on the Greater Adelaide Regional Plan Discussion Paper.

Many thanks.

Regards,

Jane

Jane Strange RPIA
State Manager SA

Tel: [redacted] | **Email:** [redacted]
PO Box 43, Elizabeth, SA 5112
Kaurna country

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Submission to the State Planning Commission – Greater Adelaide Regional Plan Discussion Paper

Planning Institute of Australia (SA Division)

November 2023

Planning Institute Australia
South Australian Division

PO Box 43 Elizabeth SA 5112
Ph: 8337 8816
Email: sa@planning.org.au

The following submission has been prepared by the
South Australian Division of the
Planning Institute of Australia (PIA)

1. Overview

The Planning Institute of Australia (PIA) is the peak national body representing planning and the planning profession. We engage with over 10,000 practitioners each year through events, education and training and represent over 5,600 members nationally. PIA is responsible for serving and guiding thousands of planning professionals, 500 of whom are located in South Australia.

Unlike other industry representative bodies that advocate for either sectors, industries or interest groups which typically have broad cross sector professional representation, the South Australian Division Committee of PIA represents urban and regional planners from across the State who provide planning expertise for both public and private sectors, non-government organisations and universities. We also represent student and retiree members.

Consequently, there is often no single position on issues amongst the PIA membership.
Our planners are professionals who specialise in developing strategies and designing the communities in which we live, work and play. Balancing the built and natural environment, community needs, cultural significance, and economic sustainability, planners aim to improve our quality of life and create vibrant communities.

As well as assessing development proposals and devising policies to guide future development, our planners work in areas as diverse as housing, energy, health, education, communications, leisure, tourism and transport. They create and revitalise public open spaces, conserve places of heritage and enhance community value.

We are pleased to provide the following submission to the expert panel as part of the Parliamentary Inquiry into the Urban Forest.

2. Greater Adelaide Regional Plan (GARP) Discussion Paper

The Discussion Paper notes that Greater Adelaide's population could grow by up to 670,000 people over the next 30 years (an increase of some 46% on today's

population), requiring bold decisions to strengthen the sustainability, liveability and prosperity of the Region.

As background, the Discussion Paper identifies that presently Greater Adelaide has:

- a population of 1.5M (2021 Census) – which is 84% of South Australia's population;
- almost 20% of its population (19.3%) over 65 years old;
- some 26.6% of its population born overseas;
- had 1.0% average annual population growth over the past 10 years, with 1.3% average annual housing growth;
- 73% of South Australia's Aboriginal population living in the region;
- 80% of the State's economic activity;
- housing dominated by detached dwellings (75%);
- seen an increase in single households of 78% since 1991;
- seen an increase in couples with no children of 52% since 1991.

The Discussion Paper notes that housing needs are changing – average household size is decreasing, such as the rise in single person households, and housing demand now outstrips population growth.

The Discussion Paper indicates that if current trends continue, Adelaide will require an additional 300,000 homes over the next 30 years. With land presently zoned for another 164,000 homes, and an estimated 47,000 homes potentially able to be provided on land identified for future residential rezonings, there is a need to identify land in the 'right locations' for an additional 100,000 homes in during this period.

The Commission proposes a balanced multi-faceted growth strategy involving:

- Infill growth – done well in the right places – including 'strategic infill' using a 'master planned' approach and
- Greenfield and township growth that does not compromise valuable agricultural, environmental and tourism assets.

Longer-term growth opportunities identified by the Commission are intended to capitalise on significant government investment in roads, including the north-south corridor, northern connector and Fleurieu Connectors Project, with other key infrastructure investments including 'super-schools' at Aldinga and Angle Vale and the Adelaide Desalination Plant.

The Commission proposes four areas outside or on the fringe of metropolitan Adelaide to investigate for future housing and employment growth. These extend from Adelaide's four main transport spines to leverage infrastructure investment and include the:

- North-western spine - Port Wakefield Road (Riverlea and Two Wells)

- North-eastern spine – Northern Expressway/ Sturt Highway (Roseworthy, Evanston, Concordia)
- Eastern spine – South-Eastern Freeway (Mt Barker and Murray Bridge)
- Southern spine – Fleurieu Connections Projects – Victor Harbor and Goolwa

Constraints

The corridors identified recognise that Adelaide features certain constraints including its western coastline, hills (protected via the Hills Face Zone) to the east and provisions in place to protect food and wine regions including the Character Preservation Districts for the Barossa and McLaren Vale as well as the Environment and Food Production Areas (EFPA) established under the PDI Act. The Character Preservation districts and EFPA cover some 89% of the Greater Adelaide Region

Changes to the Character Preservation districts are not a subject of the Discussion Paper investigation and EFPA may only be made if a 15-year supply of urban land cannot be identified outside of those areas and hence may only be considered for long-term growth.

There are limited greenfield growth opportunities in the south of Adelaide, and those identified are mainly at Goolwa and Victor Harbor. In the east, growth will continue at Mount Barker over the next 10 years and after this Murray Bridge will likely become a focus area. It is likely that most greenfield growth will occur in northern Adelaide over the next 30 years.

The Discussion Paper also notes that South Australia is becoming hotter and drier and is experiencing extreme events such as heatwaves, bushfires and flooding of increasing frequency and intensity as key factors for consideration in forward planning.

In this context, the Greater Adelaide Regional Plan will be prepared to identify growth over a 15–30-year period by investigating and guiding:

- Where house and employment land will go;
- How housing and employment land will be serviced;
- Which areas need conservation and protection and
- What major infrastructure is needed and how it will be provided,

3. Comments

PIA SA commends the Commission on its approach to elicit feedback on the future of the Greater Adelaide Region through consideration of strategic foresight and having regard to global trends.

Population Projections

PIA SA notes that unfortunately, the 'Greater Adelaide' region defined through the *Planning, Development and Infrastructure Act, 2016* is not the same as the ABS

Greater Adelaide (although identical terms are used). This ambiguity may confuse some readers of the Discussion Paper, particularly those who are involved in housing, education, community service and health policy where Australian Bureau of Statistics (ABS) data is frequently used.

PIA SA notes that the current ABS projections of population for South Australia are generally lower than the projections recently published by Plan SA, particularly in terms of the magnitude of future growth.

With the release of the Federal Housing Accord by the Prime Minister and the Federal Government's renewed interest in housing affordability, there is likely to be considerable interest and scrutiny of the housing and planning arrangements of the States and questioning of the basis of the State plans and policies affecting land and housing affordability and infrastructure. In the past, Federal agencies have tended to rely more on the national set of ABS population projections when considering issues and funding needs raised by the States.

PIA SA suggests that more detailed research and modelling of housing demand needs to be carried out in parallel with the current strategic planning process of consultation and debate about alternative futures for Greater Adelaide.

Climate Goals

PIA SA notes that the State Government recognised the existential threat posed by climate change and declared a 'Climate Emergency' in 2022 and the timeframe of the GARP coincides with the date by which Australia aspires to have reached 'net zero' greenhouse gas emissions, in 2050.

The GARP therefore has a key role to play in advancing South Australia's climate goals both in mitigating future climate change and ensuring new development is suitably adapted to a changing climate.

PIA SA recognises that if South Australia aims to achieve carbon neutrality by 2050 then all existing development (the vast majority of which will still exist in 2050) and all new development between now and 2050 will need to be carbon neutral. Recognition of this fundamental requirement needs to be the starting point for the GARP, and all policy proposals need to be assessed against zero carbon emission criteria.

The recognition of this and knowing what the implications of climate change are from a temperature and rainfall perspective, throughout the Greater Adelaide region, should be the basis of where future growth occurs and how it occurs.

Private Vehicle Use

The Discussion Paper references setting out policies intended to assist in the move to net zero over the life of the GARP, including (at Figure 2) summarising the State Government's Climate Change Action Plan which emphasizes 'avoiding, shifting and reducing the use of private cars'.

Changing the way people and goods move around is seen as critical to meeting the net zero target and the Discussion Paper points to the importance of 'disrupting car use habits' as a means of achieving this as well as obtaining other significant environmental and health benefits.

The Discussion Paper also references exploring the concept of 'Living Locally' including locating housing, employment and services closer together to create connected and climate-smart communities reducing the need for regular long-distance travel, by focussing on physically active travel options (walking, riding) and providing links to increase the use of public transport. This approach is favoured to build on the walkable neighbourhood and affordable living strategies of the *30-year Plan for Greater Adelaide* (30-Year Plan).

This highlights the need for the Greater Adelaide Plan to have a greater emphasis on establishing an integrated transport plan which is integral to supporting these concepts and new growth areas.

Fringe Growth

The Discussion Paper directs expansion towards identified the northern, eastern and southern corridors as a requirement due to Adelaide's constraints. The west is limited capacity because of the barrier of the coast, as well as increasing risk of flooding as sea level rises in the future.

However, what distinguishes this Discussion Paper most obviously from previous iterations of the 30-year Plan is its proposed move away from previous attempts to achieve a more compact city and to instead encourage greenfield development in areas beyond the outer edge of the current metropolitan area. If local employment or services are scarce, then commuting over long distances will be necessary for many residents who live in these outer areas.

In this, the Discussion Paper references a need to capitalise on significant ongoing government investment in roads, including the north-south corridor, northern connector, and the Victor Harbor Road. However, there is no corresponding discussion of the need to extend the public transport network to meet the travel needs of residents at and beyond the urban fringe and the only mention of a new housing development on a rail line is at Kudla, south of Gawler.

It seems otherwise that residents of remote housing developments will be required to drive, and it is difficult to see where their opportunities for 'living locally' or for walking or cycling to work or to other activities will come from and how carbon neutrality can be achieved.

This presents a fundamental inconsistency in the GARP Discussion Paper, where it aspires to a number of worthy climate change goals, but it seeks to pursue these by encouraging the outward growth of the city along main roads through low density car-based housing development.

It should be acknowledged that greenfield developments beyond the urban fringe

have also historically often demonstrated social disadvantages, with time spent in (often car) travel, health/ fitness and equity of service accessibility providing reasons to pursue denser, more pedestrian and transit-supported communities.

Fringe-growth should preferably be via planned expansion using public-private joint ventures through which the government ensures the timely provision of social services, education, transport, utilities and other infrastructure while emphasising housing affordability, energy efficiency, better water management and other ways of making Adelaide more sustainable and less vulnerable to the threats of climate change. Historically examples, such as Golden Grove, Mawson Lakes, Playford North, Bowden and Lochiel Park have demonstrated the effectiveness of this approach.

Compact City

PIA SA considers that the compact city should remain the leading idea underpinning Adelaide's future planned growth and that there remains much unfulfilled potential for providing new housing through redevelopment and better planned densification within the existing metropolitan area.

PIA SA acknowledges that a goal of achieving higher residential densities needs to take account of the area of land required for other uses which support residential development. That is, if there is a significant increase in residential density, other uses, such as main roads, schools, health services, shopping centres, parks and so on must be provided at commensurate capacity/ density to support this. One strategy is to have a 'multi-level' use approach which has been applied to examples of inner areas of Sydney and Melbourne. Oxford Street at Bondi Junction is an example where the Westfield shopping centre is multi-level and features a range of uses, supported by a nearby building featuring a major bus interchange, food court and early learning facility.

Transit-oriented development remains a largely untapped opportunity for Greater Adelaide, noting that many suburban rail stations in Adelaide are still surrounded by relatively low-density land uses and could provide liveable, walkable and accessible communities developed with well thought through urban design around transport hubs along Adelaide's recently electrified rail lines.

In this, consideration should be given to upzoning within 400m of transport and major retail nodes, including within character areas. However, in such circumstances, current property owners should be required to contribute to infrastructure funding if they are to receive a financial benefit.

The potential for planned infill in these middle and outer suburban areas, focused on redeveloped and intensified activity centres, needs more emphasis as an opportunity for redevelopment of existing suburbs on a larger scale than has occurred to date. This could offer more scope for new forms of housing in pursuit of the 'missing middle' as mentioned in this Discussion Paper.

Public Transport

PIA SA notes that for a city approaching one and a half million inhabitants to plan to add an estimated further 670,000 in population without committing to extending and improving the mass transit network is unprecedented. A commitment for accessible and efficient public transport is essential for growth planning for Greater Adelaide to succeed.

The main highways to the north, east and south of Adelaide are freight routes for intrastate and interstate trucks and with the growth model proposed, the north-south arterials are likely to carry increasing through traffic because of the increasingly elongated north-south shape of Greater Adelaide. Congestion and delays on these major roads contributes to additional freight costs which in turn affects cost of living and made Adelaide less competitive.

With this, it is clear that commuters will not be attracted to slow moving unreliable bus services affected by increasing traffic congestion. Those commuters who can, will choose to use private vehicles, causing even worse traffic congestion. The high patronage of the North-East O-Bahn indicates that commuters are attracted by speed which is competitive or superior to other options.

For long distances and for high speed, rail appears to be the best choice, as evidenced by the investment in new double track high speed electric commuter lines to the north and south of Perth over the last 30 years.

It is suggested that the GARP:

- Proposes a high-speed rail corridor from 'Adelaide to Mount Barker and Murray Bridge' and separately from 'Seaford to Victor Harbor' as concepts for further investigation;
- Proposes a new transport study be carried out to holistically analyse transit and freight needs in the light of probable population growth in the Adelaide Hills and Murray Bridge regions and the implications of any option for the existing road and rail transport network in the existing inner suburbs of Adelaide.
- Proposes that corridors be identified and reserved for:
    - A possible future rail route from Mitcham to Mount Barker and Murray Bridge (including land required to increase the radius of existing curves to enable much higher speed operation on the existing rail line, where required);
    - A possible future rail route from Seaford to Victor Harbor;
- Notes that the rail line from Gawler to the Barossa Valley has some tight curves which should be modified to a larger radius to enable higher speed operation, which will require acquisition of land prior to the development at Concordia.

- Identifies that the land for the rail corridors be acquired at the time when new urban areas along the proposed route are proposed for subdivision.

A focus on improving and expanding rail services should enable links to feeder bus services to be enhanced, assisting those in outer suburban areas to access a broader range of education and employment opportunities.

Investment in this area would also then ideally support revisiting the notion of a CBD 'City Loop'. Interstate experience and engineering expertise in urban rail projects could benefit Adelaide in terms of exploring related options in this space.

Satellite City

PIA SA recognises that inevitably there will be a need for Adelaide to grow outwards at some point and a 'satellite city' is a sensible option provided that it has

- A large settlement with a distinct centre featuring a substantial amount of employment opportunities sufficient to act as a genuine focus for major regional, educational, social and health services;
- An efficient public transport connection between the 'satellite city' and Adelaide, preferably via an extension of the recently electrified rail network as well as an efficient local public transport system;
- A coordinated delivery model to ensure that an integrated approach could be taken to its development. An updated South Australian joint venture model could suffice, or some other form of development corporation or specialised government body that is able to create and deliver a vision and a viable plan for the new town or city, and oversee a planned land release, allowing the private sector to invest with confidence, and the timely provision of infrastructure and services.

Other Considerations

Airports

A bold idea to potentially consider in the GARP is forward planning a future relocation of Adelaide's airports, to enhance freight connectively, enable 24/7 airport operations, remove height restrictions and allow existing airport land to be rehabilitated and redeveloped for other purposes.

Aged Care

Aged care will be a significant requirement into the timeframe of the GARP, both in terms of at-home care and aged care facilities. This will likely be an important area of employment, including ancillary support for shopping, transport, gardening and home maintenance across Greater Adelaide including in the outer areas.

Artificial Intelligence

The Discussion Paper does not consider the future impact of artificial intelligence on employment. This technology will have a large impact on society, business and government.

Cemeteries

With the forecast population growth, it is suggested that the GARP ought to include proposals for additional cemeteries.

Environment and Food Production Areas

PIA SA is concerned that the EFPAs are viewed in the Discussion Paper as land in waiting for urban growth. There is a need to provide greater certainty regarding the future of the areas of Greater Adelaide that are relied upon to produce food, wine, feed/ fibre and tourism experiences for local and global markets located at the fringe of our townships and urban centres.

Additional investigations should be undertaken within the EFPA's to identify priority production areas (e. g. , those with highest soil capability, regular rainfall and/ or other advantageous conditions), or habitat and landscapes and preserves these with suitable policies. Other corresponding policy avenues to explore include any further appropriate value-adding employment opportunities.

Housing Affordability

The residential vacancy rate for Adelaide is incredibly low and PIA SA is concerned about increasing homelessness caused by housing affordability and cost of living pressures. The difficulties in providing a required level of infrastructure in growth areas can see rates rise and further land development costs passed on to new homeowners. Federal and State Government assistance in planning and delivery of key trunk infrastructure prior to or at the time of large scale rezonings would assist with moderating this impact.

Coordination with social housing providers needs to be considered within growth areas and other key in-fill sites.

Infrastructure

PIA SA wishes to emphasise the critical importance of ensuring the timely provision of infrastructure to support (particularly Greenfield) growth. Communities need to be supported from the beginning and growth should only be occurring where this is achievable. Also, the GARP should include a clear vision for Greater Adelaide and show where infrastructure investment will occur.

To do this most effectively and efficiently will require all parts of government and other utilities collaborating on structure planning for new growth (including drinking water and sewer, health, education, emergency services, public transport and regional recreation), reflected in individual departmental and corporate strategic planning, and then working with the development sector to plan and deliver this when necessary.

Inter-urban breaks

PIA SA supports 'inter urban breaks' to provide a definite distinction between townships and urban areas, assist with stormwater management and support critical habitat, movement of wildlife, biodiversity and native vegetation.

Natural Hazards

The forecast rise in sea level will make the western suburbs of metropolitan Adelaide progressively harder to drain naturally. Extreme storm events coinciding with high tide and storm surge will eventually cause increasingly frequent extensive shallow flooding of low-lying areas of the western suburbs. Policy settings and proposals for more intensive development will need very careful consideration accordingly.

Beyond this, the hazard exposure of housing in the growth areas to increased flood, bushfire and heat risks is a key concern. This includes where development is occurring (or further contemplated) at the hard interface with high-risk bushfire land.

Reactive Soils

An aspect of new growth area selection requiring careful attention is geotechnical suitability. Reactive soils add considerably to the cost of infrastructure and buildings and should be a consideration in forward planning of growth areas.

Renewable Energy and Battery Storage

South Australia has made great strides in developing its renewable energy resources, notably solar and wind.

However, battery and energy storage need to expand significantly to better utilise intermittent renewable energy generation. Generation capacity also needs to expand to keep pace with rising population, housing and economic activity.

Design and built form have a key role in reducing energy demand, particularly as climate fluctuations such as lengthy heat waves become more frequent.

The GARP has a key role to advance South Australia's climate goals both in mitigating future climate change and ensuring new development is suitably adapted to a changing climate.

Sub-Regional Opportunities

The GARP should explore the potential to take a sub-regional approach given the varying issues and characteristics of the Greater Adelaide region – for example the Mt Lofty Ranges/Fleurieu has bespoke primary production land and townships distinct from other areas of the Greater Adelaide region such as Mt Barker to Murray Bridge which feature larger settlements with agricultural land and key employment sites and renewable energy expansion options.

Working From Home

The evidence of the effect of 'working from home' on longer term trends in employment patterns is not yet conclusive. Those able to take advantage of working from home are usually knowledge workers in jobs with flexibility and autonomy. The longer term effects of this aspect of the COVID-19 pandemic response will emerge in time and this, combined with artificial intelligence considerations, will likely have an effect on future commuting habits and workplace composition over the timeframe of the GARP.

4. Conclusion

PIA SA supports the intent of the GARP and notes that the Discussion Paper on the Greater Adelaide Region is a welcome and timely strategic initiative.

Growth is inevitable and desirable however, it must be managed and delivered in a way that responds to the climate crisis as a basic requirement of all new development.

In this, all policy proposals need to be assessed against zero carbon emission criteria.

PIA SA calls for more coherence in the policy suite set out in the GARP Discussion Paper. To achieve this PIA SA respectfully suggests that climate goals become the basis on which the plan is developed, with all policy directions requiring assessment against the basic criteria of their likely carbon footprint and their social, economic and environmental sustainability.

PIA SA would welcome an opportunity to present to discuss the content of this submission if the Commission so desires.

Yours sincerely,



Cate Hart
President
PLANNING INSTITUTE OF AUSTRALIA
(SA DIVISION)

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: FOR ACTION: PPSA SUBMISSION, Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 5:50:33 PM
Attachments: image001.png
PPSA Submission - GARP FINAL.pdf

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FOR ACTION

Good afternoon

Please find attached a submission to the Greater Adelaide Regional Plan Discussion Paper, on behalf of Primary Producers SA.

Thank you for the opportunity to comment.

Kind regards
Caroline.

Caroline Rhodes

Chief Executive Officer

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6 November 2023

To whom it may concern

Thank you for the opportunity to comment on the **Discussion Paper for the Greater Adelaide Regional Plan** released by the State Planning Commission ('the **Commission**') for public consultation on 14 August 2023. We welcome the opportunity to enhance the legislative framework governing South Australia's planning laws in the greater Adelaide region over the next 30 years.

Primary Producers SA (**'PPSA'**) is the peak industry body representing the interests of South Australian primary producers and is the South Australian member of the National Farmers Federation. Our members are the peak commodity organisations of South Australia. Current members include Grain Producers SA, Livestock SA, SA Dairyfarmers' Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA.

PPSA is proud to champion the significant achievements of South Australian agriculture— a $17 billion sector, that supports over 70,000 jobs and provides more than half of the state's export earnings. We believe the food, wine and fibre value chains in South Australia forms the social and economic fabric of the state, supporting our tourism sector and the enviable lifestyle offering of the city of Adelaide.

South Australians are rightly proud of the world-renowned food and wine produced in the state, and those living outside of South Australia primarily know the state through a food and wine lens. The Greater Adelaide region encompasses some of the most iconic South Australian tourist regions, such as the Barossa Valley and the Adelaide Hills, that directly rely upon the existing rural landscape managed by primary producers. The natural capital of the region is an asset for the state at large.

A significant proportion of the Greater Adelaide area further encompasses important rural production areas which are inherently fertile and close to markets and services for key horticultural, dairy, livestock, seed and fodder, cropping and forest industries, that generate significant earnings for the state. The employment opportunities within the sector can provide the full spectrum of skilled, semi-skilled and unskilled careers, and will underpin the regional employment outcomes.

Previous growth management strategies have had a significant focus on urban land supply, but not enough attention has been paid to how this affects the region's rural landscapes.

While PPSA acknowledges the need for state and federal governments to address a critical housing shortage, we are concerned that the alienation of prime agricultural land – frequently referred to as "greenfield sites" – is impacting upon the state and nation's food production and security.

We have reviewed the Discussion Paper and have addressed questions of interest to the primary production sector. PPSA brings the following key observations to the attention of the Commission:

- In contrast to previous editions of the regional plan for Greater Adelaide (2009, 2017), and despite claims in the Commission Chair's introductory message, the discussion paper is largely silent on primary industry.
- The discussion paper makes various references to the importance of protecting key resources but provides no detail about how that will happen and says nothing about the role of land use planning in enabling primary industry and managing the local circumstances that confront primary producers on a day-to-day basis.
- The discussion paper also ignores the sector's contribution to the regional and State economy, both directly, in the form of raw and processed products, jobs and export earnings, and indirectly, through tourism income generated by the rural landscapes created and managed by primary producers.
- The discussion paper fails to recognise the scarcity of arable land and water resources in South Australia, and the compounding negative impact of urban development to remaining primary production enterprises in the region. There is an inherent bias in framing agricultural land as "greenfield sites" for housing development, without due recognition of the value of existing land use or natural capital.
- To address these shortcomings, PPSA recommends that the Commission take the opportunity provided by this next GARP to ensure it is implementing *State Planning Policy 8: Primary Industry* in the region.

PPSA has a strong interest in the operations and effectiveness of the South Australia's planning laws, and will pursue planning law reforms, key food area assessments, and work on behalf of the agriculture sector to ensure that appropriate urban growth policy settings are implemented.

Farming land is often the easiest to source and cheapest to develop, but this comes at an enormous cost to the wider agricultural industry and Australia's capacity to produce food. Many of those impacted farms are small and family businesses who simply do not have the skillset to deal with large land developers and government agencies.

We therefore welcome the opportunity for ongoing consultation in the development of the Greater Adelaide Regional Plan. If the Commission, or the Department for Trade and Investment have any queries regarding this submission, please feel free to contact me via email admin@ppsa.org.au

Thank you for your careful consideration of these matters.

Yours sincerely

[redacted]

Caroline Rhodes
Chief Executive Officer

Submission: Greater Adelaide Regional Plan discussion paper

Introduction

Primary Producers SA (PPSA) has reviewed the discussion paper for the *Greater Adelaide Regional Plan* (hereafter 'GARP' or 'the Plan'). Following our summary of key messages below, we offer several general observations and recommendations before addressing questions posed in the document that are relevant to our strategic interests and core business. References to page numbers relate to the full version of the discussion paper.

PPSA has also taken the opportunity to revisit *State Planning Policy 8: Primary Industry* (hereafter 'SPP8') and use it here as a point of reference for our comments (see Attachment).

PPSA notes the assertion in SPP8 that "Regional Plans should implement State Planning Policies". This appears to provide a straightforward guide as to the necessary ambitions of the eventual GARP and, by extension, the adequacy of this discussion paper in canvassing the scope of that Plan.

Key Messages

- **In contrast to previous editions of the regional plan for Greater Adelaide (2009, 2017), and despite claims in the Commission Chair's introductory message, the discussion paper is largely silent on primary industry.**
- **The discussion paper makes various references to the importance of protecting key resources but provides no detail about how that will happen and says nothing about the role of land use planning in enabling primary industry and managing the local circumstances that confront primary producers on a day-to-day basis.**
- **The discussion paper also ignores the sector's contribution to the regional and State economy, both directly, in the form of raw and processed products, jobs and export earnings, and indirectly, through tourism income generated by the rural landscapes created and managed by primary producers.**
- **The discussion paper fails to recognise the scarcity of arable land and water resources in South Australia, and the compounding negative impact of urban development to remaining primary production enterprises in the region. There is an inherent bias in framing agricultural land as "greenfield sites" for housing development, without due recognition of the value of existing land use or natural capital.**
- **To address these shortcomings, PPSA recommends that the Commission take the opportunity provided by this next GARP to ensure it is implementing *State Planning Policy 8: Primary Industry* in the region.**

PPSA at a glance

Primary Producers SA (PPSA) is the peak industry body representing the interests of South Australian primary producers.

PPSA also serves as the South Australian member of the National Farmers Federation (NFF). This ensures PPSA is directly engaged in all NFF activities including implementation of the Roadmap for Australian Agriculture to exceed $100 billion in farm gate value by 2030.

PPSA has the capacity to provide strong representation and advocacy on behalf of the South Australian primary production sector through our membership base.

Our members are the peak commodity organisations of South Australia. Current members include Grain Producers SA, Livestock SA, SA Dairyfarmers' Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA. Each organisation is represented by a councillor on the PPSA Policy Council, to provide direction and oversee the operations of PPSA.

Our purpose

As the united voice of South Australia's primary production sector, our purpose is:

- To **advocate the interests and concerns of Primary Producers** to both State and Federal governments and community using evidence-based reasoning;
- To **present one voice** to government, both State and Federal, and the wider community on Cross-Commodity issues affecting Primary Producers in South Australia;
- To **promote Primary Production in South Australia** and ensure that the contributions and achievements of South Australian Primary Producers are recognised; and
- To **assist stakeholders and suppliers to Primary Production** where such assistance will benefit Primary Producers.

What we do

PPSA develops the South Australian primary production sector through:

1. **Engagement**. PPSA partners with government and industry to develop policies and programs that promote the social, economic, and environmental sustainability of South Australian primary production.
2. **Leadership**. PPSA acts as the conduit to the South Australian primary production sector and presents a united voice on behalf of its membership in advocacy and representative activities.
3. **Communication**. PPSA influences policy makers by promoting the contribution we make to the South Australian economy and engaging positively with government and the broader community.

General response to the discussion paper

PPSA supports the circulation of a discussion paper to stimulate community and stakeholder engagement in formulation of the GARP. We also commend the Commission for the extended period of consultation it is providing in this instance. However, we have a number of serious concerns with the document.

First, ***we are concerned about the discussion paper's silence on rural land use matters generally and primary industry in particular***.

- The Commission Chair's introductory message asserts that "discussion will centre on the features and characteristics that make the Greater Adelaide region so special: our premium food and wine, our scenic landscapes and natural environment…" (p.7).
- Primary industry is inextricably linked to all of those features and characteristics but its central role in their creation and maintenance is not mentioned, much less discussed. There is no consideration anywhere in the document of primary industry as a type of land use or business that might have special planning policy requirements; or as an industry that might warrant strategic support in certain localities and circumstances; or as the key element of a regional landscape on which a substantial tourism economy rests.
- It is acknowledged that this is a preliminary document, and that the Commission may have intentions for rural areas and primary industry in the GARP that are yet to be revealed. If this is the case, we look forward to hearing more at the earliest opportunity.
- Likewise, we are conscious of contemporary concerns around housing availability and affordability and acknowledge that these are a legitimate and reasonable focus for this Plan. Indeed, some PPSA member organisations and many primary producers have encountered problems with accommodation for seasonal workers in recent years.
- However, on the understanding that "the discussion paper is for all Greater Adelaide residents" (p.7), and that the Plan it envisages should be one for the entire region, we find the lack of serious attention to primary industry matters troubling.
- Previous editions of the Plan have addressed the topic directly and made various policy and infrastructure commitments, albeit with only mixed success.
- If this discussion paper is any guide, it appears the next Plan has no ambitions in that regard. Noting the expectation that "Regional Plans should implement State Planning Policies", and that those policies have been 'live' since 2019, this situation is remarkable. We address this matter further in our recommendations below.

Second, and as a consequence, ***the discussion paper has nothing to say about how the GARP might create a supportive local operating and investment environment for primary producers*** in the face of continuing non-farm development in the region's rural landscapes and ongoing business diversification amongst producers themselves. ***Neither does it canvass any policy or infrastructure initiatives that might assist the sector***, for example, in systematically identifying key resources and assets across the region, adapting to climate

uncertainty, or establishing 'hubs' or 'clusters' to support local industry development. There is nothing positive in the discussion paper for primary industry at either the business or sector level.

- To the extent primary industry is mentioned in the discussion paper, it is almost exclusively in repetitious and hollow-sounding references to the importance of protecting or preserving key resources.[1] Of course, PPSA endorses this broad sentiment: access to suitable land and water underpins the productivity of the primary industry sector and South Australia's scarce arable landscapes are increasingly the subject of competition from other sectors.
- Mining and extraction activities, large-scale renewable energy generation and transmission projects and, in the Greater Adelaide Region especially, an expanding urban footprint all mean that primary industry cannot take access to resources for granted.
- However, in its repetition, the discussion paper seems to assume that planning for primary industry begins and ends with periodic site selection decisions about future greenfield development. It ignores the various enabling roles referred to above, which are essential for primary industry to remain competitive. Likewise, it is silent about the indirect impacts on primary industry—completely unrelated to greenfield development—arising from non-farm development across the region's rural zones; and about the fragmentation of working agricultural landscapes that accompanies this less visible phenomenon.

Third, in relation to the identification of future greenfield sites, **the discussion paper relies on a change of stance regarding the Environment and Food Production Area (EFPA) that, PPSA believes, risks undermining its original objectives**.

- We note the Commission's undertaking to quarantine the Barossa Valley and McLaren Vale Character Preservation Districts (CPDs), and some other areas, from consideration as potential greenfield development sites (p.103). Regional stakeholders will welcome this but may also be hoping that that the eventual GARP will carry over provisions relating to these designations from the current (2017) edition of the Plan. Likewise, they may wish to see a commitment to ensuring that State Planning Policies 21 and 22, which relate specifically to the two CPDs, are being implemented. These actions will do more to address the local land use concerns of stakeholders, including primary producers, than the CPD's headline policy controlling land subdivision.
- At the same time, the Commission is proposing to bring the EFPA into the frame for consideration as potential greenfield land (pp.104-5). We acknowledge that this has always been anticipated in the fine print of the EFPA provisions, although that will not have been obvious to casual observers; and that the areas in question will be small.

[1] See for example, "our valuable agricultural…assets" (p.8), "our food and wine growing regions" (p.10), "areas of high agricultural…value" (p.83), "places of high primary production…significance" (p.101), "valuable food and wine regions" (p.102), "our prime food and wine regions…from urban encroachment" (p.104) and "valuable primary production land" (p.127).

- However, this change of stance will immediately undermine whatever certainty about future land use the designation has engendered since its introduction. In the circumstances, and noting the implied intention to also abandon a target for the infill to greenfield ratio (p.110), we believe the community deserves a clearer and more substantial justification and explanation of this proposal than what appears in the discussion paper. This is especially so for those stakeholders to whom the EFPA was originally and largely targeted: primary producers.
- Related to this, we also note the technical challenge of assessing potential future greenfield sites within the EFPA and would welcome more information about how that will occur.
- In particular, how will the undertaking (p.104) to review the agricultural significance of such land be implemented?
- To be meaningful and credible such assessments would have to be conducted on a whole-of-region, if not whole-of-state basis, but our understanding is that South Australia currently has no formal or agreed mechanism for systematically assessing the significance of agricultural land. Work undertaken by PIRSA in response to the original (2009) edition of the Plan was never implemented.
- Also, noting the recent history of primary producer grievances in the vicinity of potential greenfield sites and related infrastructure projects, what arrangements might be considered for providing better forward notice, transparency and transition assistance to landholders in the path of future development?
- These will be important and necessary features of a regional plan predicated on an increasing reliance on greenfield development. We address these matters further below.

Finally, ***the discussion paper's brief consideration of Greater Adelaide's regional economy ignores primary industry entirely***.

- Given the sector is associated with some important elements of South Australia's economy and identity, as well as current economic development and marketing strategies, this too is remarkable. The omission is also problematic according to the data: while the sector is not as significant a component of the regional economy—in percentage terms—as it is in the State's other regions, it is surprisingly productive from its constrained land base.

PPSA economic analysis

At the 2020/21 ABS Agricultural Census, the Greater Adelaide Region (GAR) generated almost 20% of the State's total gross value of agricultural production. As summarised in Figure 1 below, this compares favourably with South Australia's other much larger regions.

Significantly, that output is from a productive land base (530,527ha) that is much smaller than those other regions and, indeed, smaller than some individual LGAs, e.g. Goyder (618,733ha) and Coorong (554,722ha).

Region*	Value of Production (Total gross value, $)	Value % (% of total SA gross value)	Farm Area (Land mainly used for agricultural production, ha)
Greater Adelaide	1,522,453,676	19.8	530,527
Kangaroo Island	99,900,206	1.3	130,181
Eyre & Western	741,899,045	9.7	2,629,472
Far North	222,063,411	2.9	33,248,631
Yorke & Mid North	1,789,324,743	23.3	3,478,538
Murray & Mallee	2,004,970,821	26.1	1,997,275
Limestone Coast	1,214,200,193	15.8	1,503,123

Figure 1: Total Gross Value of Production and Total Farm Area by South Australian Planning Regions*, 2020-21. *Source: Australian Bureau of Statistics, 2022, VACPDCLGA202021 - Value of Agricultural Commodities Produced, Australia, 2020-21 and AGCDCLGA202021 - Agricultural Commodities, Australia–2020-21.* *To correspond with current regional plans, the Greater Adelaide region includes Murray Bridge but excludes Kangaroo Island, which is its own region; and the Murray & Mallee region excludes Murray Bridge.

The importance of primary industry in the GAR is even more apparent when using an indicator of net contribution to the economy, ie. profit generation, as opposed to simple farm output, which takes no account of costs.

Figure 2 shows the sector's contribution to Gross Regional (and State) Product across all regions and illustrates, again, the GAR's disproportionate significance. The extent of that contribution can be attributed, in part, to the more labour-intensive nature of farm businesses in the region and, in part, to their greater integration with tourism and high value local markets. However, this chart still does not reveal everything about the economic significance of primary industry in the GAR. Figure 2 does not fully convey the substantial indirect economic value derived from the region's rural landscapes in the form of tourism, courtesy largely of primary producers; nor does it account fully for the State's equine industry, which is heavily concentrated in the GAR and reliant on farm businesses and allied services across the region.

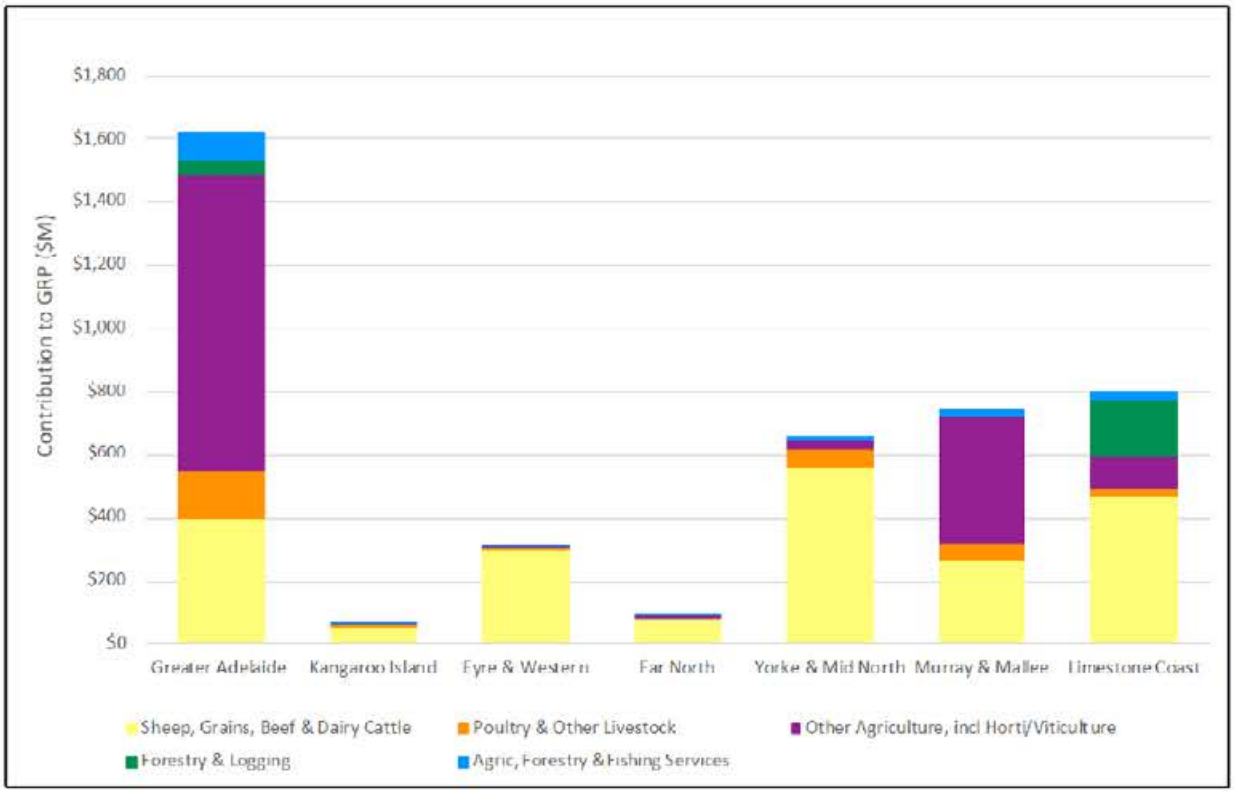


Figure 2: Contribution to Gross Regional Product by generalised primary industry sectors for South Australian Planning Regions*, 2022. *Source: REMPLAN (2022 Release 2) and PIRSA.* *To correspond with current regional plans, the Greater Adelaide region includes Murray Bridge but excludes Kangaroo Island, which is its own region; and the Murray & Mallee region excludes Murray Bridge.

That the GAR is so significant speaks to its special opportunities and strategic advantages for primary industry, most of which are not readily available or replicable elsewhere in this State.

For example, the Adelaide Hills are a key asset for cool climate horticulture in South Australia; cropping districts on the northern Adelaide Plains routinely and reliably generate some of the State's highest grain yields; the region is home to the majority of South Australia's premium wine regions; and access to recycled urban wastewater underpins 'drought-proof' irrigated horticulture and viticulture north and south of the city.

In other respects, production districts adjacent to Adelaide also enjoy the advantage of proximity to freight routes and distribution hubs, processing facilities, labour, input suppliers and local markets. The benefits of these circumstances are not limited solely to production, however. For consumers, the value of short food supply chains was illustrated nationally and internationally during the global pandemic and the various freight logistics disruptions that followed it.

Making best use of these opportunities and advantages, for individual farms and agribusinesses, for the sector and for the State, should not be left to chance. We address this matter further below

Discussion and Recommendations

Prior to release of this discussion paper, and based on membership feedback over several years, PPSA has been developing a policy position on land use planning.

Concerns raised by our member organisations and their constituents relate to matters such as: interface conflicts and the role of buffers, complaints about farming practices within rural zones, preserving arable land and planning system complexity.

To address these concerns we intend to pursue planning law reforms, key food area assessments, and work on behalf of the sector to ensure that appropriate land use policy settings with respect to primary industry are implemented.

We understand that not all of these matters can be dealt with at the level of Regional Plans, such as the GARP, and that some would be best dealt with through the Planning and Design Code, in the form of a Code amendment.

Nevertheless, against the backdrop of this stakeholder feedback, we are surprised that the discussion paper has so little to say about primary industry in the GAR and feel obliged to formally register our concern.

In the circumstances, and as you review feedback on the discussion paper, ***PPSA recommends that the Commission revisit State Planning Policy 8: Primary Industry to ensure the new GARP will deliver the outcomes envisaged for the sector***.

- SPP8 aligns well with our assessment of where work is needed in the land use planning arena, and provides a reasonable and constructive framework for dealing with primary industry matters.
- Furthermore, on our reading of the policy itself, the *Planning Development and Infrastructure Act* 2016 and the discussion paper (p.32), its directives cannot be ignored.

For this reason **PPSA also recommends that the Commission develops a work program and timetable to conduct a review of SPP8 implementation**, and includes that commitment in its draft GARP next year, in the State's other regional plans at the earliest opportunity, and in the next edition of its own strategic plan. The work program should also address most of the recommendations below that are made in response to the discussion paper's specific questions.

We would be happy to discuss this with you further and contribute to the task as it develops. Importantly, that contribution would extend beyond a simple tabling of grievances because, in addition to our internal work on land use planning policy, PPSA supported Fleurieu Peninsula producer James Stacey's 2018 Nuffield Scholarship, which focused on securing agriculture's future in peri-urban areas. One of the key recommendations in his final report, Growing Pains: Planning for Future Populations, was that producers need to lobby state and federal governments on the importance of maintaining and preserving viable farming businesses in the near-urban environment and how they can co-exist with a rapidly growing

population. We believe this report, and James' experiences, would be a useful resource for you in progressing this matter constructively.

Responses to discussion paper questions

Of the sixteen questions posed in the discussion paper, only seven have direct or indirect relevance to the core business and strategic interests of PPSA and its member organisations. Our responses to those questions appear below.

We make further recommendations here and would be happy to elaborate on these in the context of a Commission-endorsed work program to ensure implementation of SPP8.

- *What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers? (Page 37)*

  As noted above, access to suitable land and water underpins the primary industry sector, and South Australia's scarce arable landscapes are increasingly the subject of competition from other sectors.

  Changing climatic patterns will further complicate the outlook for primary producers. The prospect of a shrinking and/or less predictable resource base, as anticipated on p.41 of the discussion paper, puts a premium on protecting assets that are flexible and reliable.

  Noting the strategic significance of the region in this regard, the GARP should address this by, for example, keeping options open for primary industry in high rainfall districts and on land with access to recycled water. However, this is not a simple undertaking and will require something more substantial and systematic than periodic assessments of potential greenfield sites. As observed above, such a program needs to be conducted on a whole-of-region, if not whole-of-state basis to be meaningful and credible. An assessment program that looks beyond greenfield sites is also necessary to deal with challenges posed by ongoing non-farm development across rural landscapes.

  In addition, consideration of potential greenfield sites might include provision for an Agricultural Impact Statement that accounts not just for physical primary production assets, such as land, water and infrastructure, but also the impacts on functional linkages and employment within working agricultural landscapes. With uncertainty hanging over the EFPA designation, it may also be appropriate to consider extending CPD status to agreed high priority assets in the EFPA to ensure their long-term protection.

  In relation to this matter, ***PPSA recommends that the GARP make provision for 1) a regional scale program to map important land and related resources for primary industry, taking account of water, infrastructure and climate uncertainty, in consultation with relevant stakeholders; and 2) complementary measures such as***

Agricultural Impact Statements and a reconfiguration of the CPD and EFPA designations. This action would be consistent with SPP8.1: Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.

- *What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment? (Page 57)*

  The GARP should address the land use planning dimensions of climate change adaptation and mitigation in the rural parts of the region, not just the metropolitan area. Within the primary industry sector this theme has special relevance to the various forms of protected cropping systems, from horticultural netting to greenhouses, and to farm businesses seeking to diversify into carbon farming.

  In relation to these matters, ***PPSA recommends that the GARP propose changes to the Planning and Design Code to provide clearer development pathways for forms of primary industry development seeking to adapt to and mitigate climate change.*** This action would be consistent with SPP8.3: Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction and restructuring; and with SPP5.7: Protect and enhance areas that provide biodiversity and ecological services and maximise opportunities for carbon storage.

- *What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region? (Page 64)*

  The region's rural landscapes are home to an increasingly diverse population, in which primary producers are no longer the main cohort. To avoid disputes between neighbours and periodic calls for 'right-to-farm' legislation, the GARP needs to better manage competing land-use demands and unresolved tensions in rural areas. It also needs to address perceived injustices in planning administration that have arisen from assumptions that consultation measures developed for urban and suburban settings are appropriate in rural settings.

  In relation to this matter, ***PPSA recommends that the GARP propose 1) changes to the Planning and Design Code to provide clearer direction regarding non-farm development in rural areas and 2) a review of public notification arrangements relating to those forms of development.*** This action would be consistent with SPP8.2: Create local conditions that support new and continuing investment in primary industry while seeking to promote co-existence with adjoining primary industries and avoid land use conflicts.

- *What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future? (Page 72)*

  Noting the sector's credentials in this regard, and the economic significance outlined earlier, the GARP needs to more explicitly incorporate primary industry into its strategic calculations. One pre-requisite for this is routine, systematic economic analysis of the sector at a geographic scale appropriate to these considerations. Another is ensuring that the strategic connections between primary industry and other sectors, such as manufacturing and tourism, are fully articulated and the land use policy implications of those connections understood. The most important, however, is a regional planning 'philosophy' that recognises the significance of the sector and treats it as a priority rather than simply part of the canvas for urban and metropolitan development.

  As well as giving the sector more serious attention in its strategic calculations, the Plan itself should also make provision for measures that will enable the sector to grow in the manner suggested by this question. These measures could cover various infrastructure and transport matters, as anticipated by the current (2017) edition of the Plan, as well as targeted policy streamlining to enable rapid establishment/expansion of primary industry businesses in priority precincts and sectors.

  In relation to this matter, ***PPSA recommends that the GARP propose 1) investigations to identify current and potential industry 'hubs', 'clusters' and transport routes that would support industry competitiveness; 2) investigations to identify opportunities for expanded use of recycled water for primary production; and 3) changes to the Planning and Design Code that streamline assessment pathways for primary industry development***. This action would be consistent with SPP8.3: Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction and restructuring.

- *What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor? (Page 115)*

  Without prejudice to the notion of expanding these two urban areas to become satellite cities, it would be important to avoid encroachment scenarios for farm businesses located nearby to these towns.

  As outlined below in response to the next question, PPSA would recommend early activation of provisions for forward notice to affected landholders, transparency and transition assistance.

  On the topic of satellite cities, we take the opportunity here to suggest that the Commission consider a more whole-of-state approach to accommodating a growing population. A risk with the current suite of regional plans is that they become ends to

themselves which provide no facility for pursuing whole-of-state objectives or programs. One such objective might be a less metro-centric distribution of State population, predicated on making nominated regional centres more attractive in terms of job opportunities, housing affordability, intra-city transport, health, education and other services. Regional centres may provide some of the best opportunities for 'Living Locally' in South Australia.

- *What do you see as the benefits and potential drawbacks of greenfield development? (Page 115)*

  PPSA has no in-principle objection to the general proposition of greenfield development. However, we note that this form of urban growth presents *prima facie* challenges to both SPP8.1 and 8.4 that will need to be addressed in the GARP. We also note that, as well as its physical impacts during and post development, uncertainty for years in advance of final decisions about re-zoning can be debilitating for adjacent primary industry businesses and a source of conflict in the local community.

  As observed earlier, this latter theme requires that any future greenfield development program should include measures that provide better forward notice, transparency and transition assistance to landholders in the path of future development. Amongst those measures, assistance and advice to landholders in relation to the practice of 'optioning' by developer interests is a high priority for attention, which may require some sort of protocol or code of practice. Some of these matters are addressed in James Stacey's Nuffield Scholarship report. We also suggest investigation of working examples from other jurisdictions, such as British Columbia's well established Edge Planning program, which proposes simple but effective design solutions to avoid conflict.

  Regarding the particular proposition anticipated by the discussion paper, in which parts of the EFPA will be assessed for greenfield development during the life of the next GARP, other steps are needed. PPSA believes the Commission needs to more clearly signal its intention to change its stance on these matters with a stand-alone consultation exercise for stakeholders. That exercise should explain how the EFPA will be managed in future and cover the issues in the preceding paragraph and the question of land assessment.

  In relation to this matter, ***PPSA recommends that the GARP propose a program of integrated public consultation, landholder advice, design and transition measures to minimise adverse impacts on primary producers operating adjacent to current and potential new urban areas. We also recommend that the Commission run a separate consultation regarding its intentions for the EFPA.*** These actions would be consistent with SPP8.4: Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.

- *What do you see as the benefit and potential drawbacks of infill development? (Page 127)*

  This matter is outside PPSA's normal core business. However, noting this State's limited arable land base and evolving uncertainty and risk surrounding climate and water, we believe it is important that the Commission continue to actively pursue infill opportunities.

  Similar to the previous matter, we believe the Commission's change of stance on this topic, including the decision to abandon an infill-greenfield ratio target, requires a better explanation than what appears in the discussion paper. PPSA does not pretend to be an infill development authority. However, we believe it is not unreasonable to ask the Commission to confirm that its investigations have fully exhausted the range of opportunities for infill development in the urban footprint (from 'granny flats' in the suburbs[2], to re-purposed CBD buildings[3]); and fully accounted for all land and sites for that purpose. We also believe it is not unreasonable to ask the Commission to confirm that this evidence is independent or capable of being independently verified.

  In relation to this matter, ***PPSA recommends that the Commission regularly report on land availability for infill development and its efforts to increase availability and/or address impediments to availability.***

[2] See, for example, https://www.abc.net.au/news/2023-10-02/south-australia-granny-flats-to-tackle-rental-crisis/102923404

[3] See, for example, https://newsroom.unsw.edu.au/news/art-architecture-design/adaptive-reuse-should-we-convert-empty-offices-address-housing

8

STATE PLANNING POLICY 8: PRIMARY INDUSTRY

Citation

This is a State Planning Policy made under the *Planning, Development and Infrastructure Act 2016*. This policy may be cited as *State Planning Policy 8: Primary Industry*.

Purpose

South Australia's agriculture, forestry, fisheries and aquaculture industries are fundamental to our prosperity and identity. Along with their associated tourism and service industries—and the infrastructure that supports their production and marketing—primary industry value chains are major generators of economic activity and employment in each of the regions of the state.

The land, water and marine resources used by primary production are subject to increasing demands and more complex community expectations. The industries themselves are also experiencing continual pressure for change. As a result, primary industry's contribution to the state and regional economies cannot be taken for granted. These circumstances require a land-use planning framework that is relevant and responsive to industry needs and aspirations, and that is capable of:

- protecting key assets and securing emerging strategic opportunities
- creating local conditions that support new and continuing investment in primary industry while seeking to promote co-existence and avoid land use conflicts
- enabling business growth, adaptation, innovation and diversification that is ecologically and socially sustainable.

These challenges take different forms in each of the industry sectors above. For example, any consideration of assets for the agriculture sector extends well beyond the simple questions of land availability to include matters such as access to suitable water resources, infrastructure and labour. Depending on the industry, its asset base may also include factors such as fruit fly free status (horticulture), travel time to processors (poultry) or microclimate conditions and geographic indicators (wine grapes). The fisheries, aquaculture and forestry sectors have their own particular requirements, based on the nature of their productive systems. Land-use planning needs to understand these differences between industries and be forward-looking and strategic in its treatment of their respective assets base.

Land use planning also has an important role to play in creating local conditions that support competitive businesses and allow them to grow, adapt and evolve. This is becoming difficult in some parts of South Australia, with some previously stable primary industry locations experiencing competition for resources from new industries and encroachment by other sectors. Such circumstances require land-use planning to anticipate multiple-use scenarios on rural land and coastal land and waters and to enable the co-existence of industries. Likewise, while diversification in local and regional economies is welcome, it also presents a challenge for the planning system to balance economic opportunity for newcomers and innovators with the procedural equity of existing businesses and industries.

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This instrument is certified pursuant to section 52(1) of the *Planning, Development and Infrastructure Act 2016*



Objective

A diverse and dynamic primary industry sector making the best use of natural and human assets.

Policies

8.1 Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.

8.2 Create local conditions that support new and continuing investment in primary industry while seeking to promote co-existence with adjoining primary industries and avoid land use conflicts.

8.3 Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction and restructuring.

8.4 Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.

Principles for Statutory Instruments

Regional Plans should implement State Planning Policies by ensuring that key assets underpinning the region's current and potential future primary industry development in agriculture, forestry, fisheries and aquaculture are identified and protected. At the edge of urban areas, and wherever primary production meets other sensitive land use types, consideration should also be given to measures that equitably manage that interface.

The Planning and Design Code should implement State Planning Policies by developing assessment pathways and policies that create supportive local conditions for primary industry investment, avoid land use conflict and biosecurity threats and enable businesses to grow, adapt and evolve. Where appropriate, state interest overlays should be included to protect key assets and critical industry requirements.

Related State Planning Policies

- Climate Change
- Biodiversity
- Coastal Environment
- Energy
- Key Resources
- Strategic Transport Infrastructure
- Water Security and Quality

Related legislation and instruments

- *Native Vegetation Act 1991*
- *Environment Protection Act 1993*
- *Fisheries Management Act 1997*
- *Livestock Act 1997*
- *Forest Property Act 2000*
- *Aquaculture Act 2001*
- *Agricultural and Veterinary Products (Control of Use) Act 2002*
- *River Murray Act 2003*
- *Natural Resources Management Act 2004*
- *Irrigation Act 2009*
- *Plant Health Act 2009*