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.

136 Frome Street Adelaide SA 5000
Tel. +61 8 8100 2000
buzz@adelaidefringe.com.au adelaidefringe.com.au

Principal Partner
bankSA
SOUTH AUSTRALIA
Government of South Australia

ABN 71 660 859 461

- 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'.

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[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
heathed@hotmail.com

[redacted]

Dr Marie Ludlow
General Manager SA
Heart Foundation

[redacted]

Sharon Kelsey
Executive Director
Walking SA

[redacted]

Brett Gillett
Chief Executive Officer
Bicycle SA

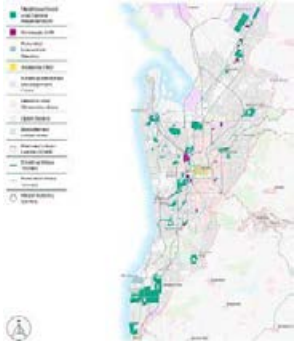
[redacted]

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

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.

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

Follow Up Flag: Follow up
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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:
Growth Management Team, Planning and Land Use Services
Department for Trade and investment
GPO Box 1815 Adelaide, SA 5001
plansasubmissions@sa.gov.au

For further information please contact:

Prof Ann Williamson: President, Australasian College of Road Safety
Dr Ingrid Johnston: Chief Executive Officer, Australasian College of Road Safety
Australasian College of Road Safety
PO Box 198 Mawson ACT 2607
e: [redacted]
p: [redacted]
w: www.acrs.org.au

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.

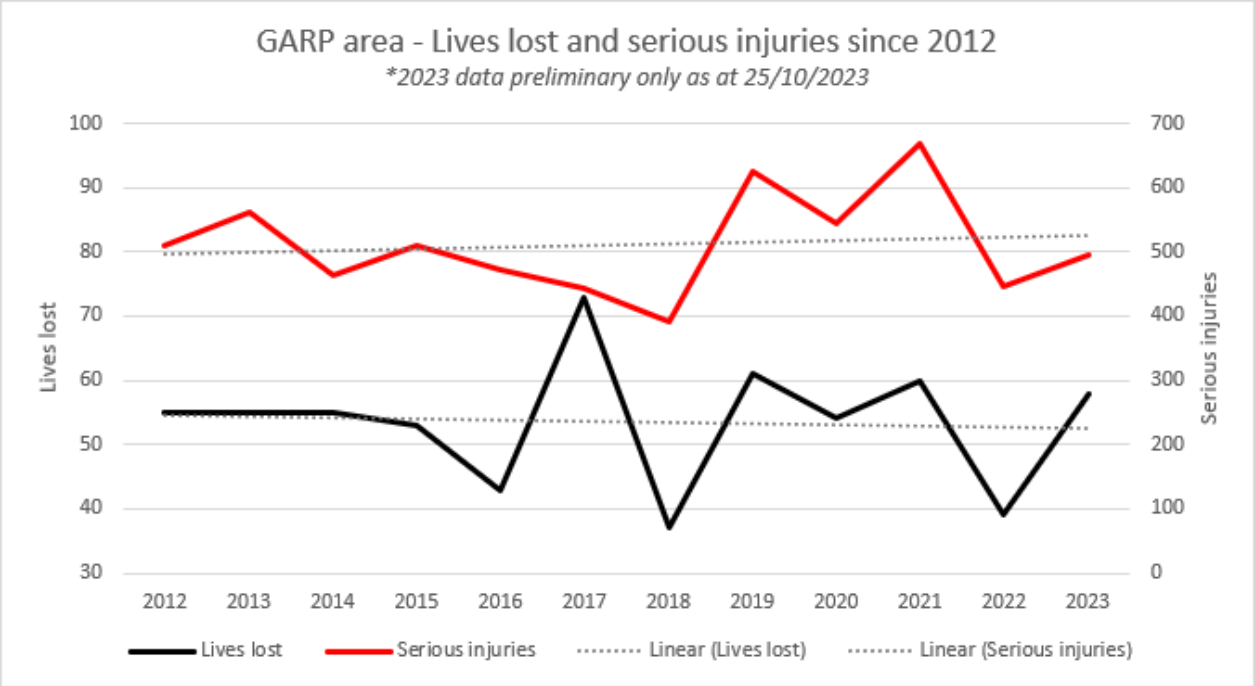


Figure 1
Source: Generated from data obtained from DIT

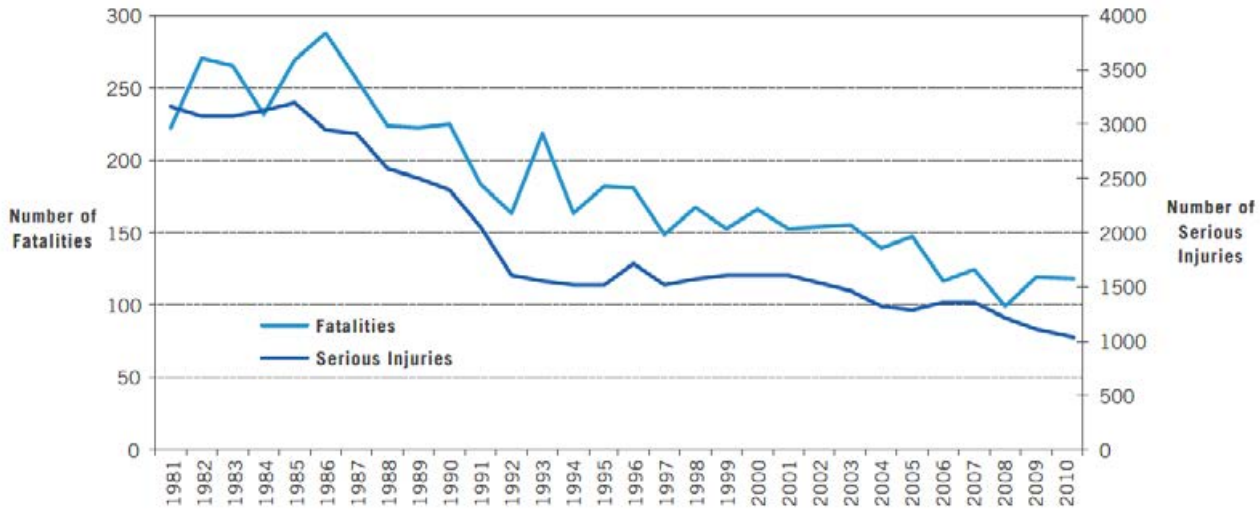
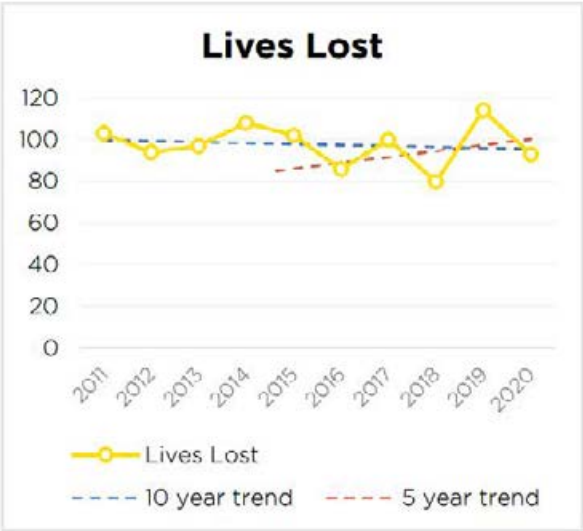


Figure 2
Source: Towards Zero Together – South Australia's Road Safety Strategy 2020(2)



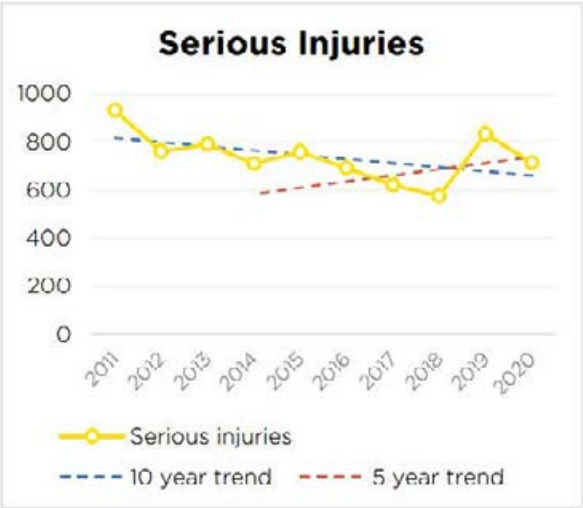


Figure 3
Source: South Australia's Road Safety Strategy to 2031(3)

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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From: [redacted]
To: DTI:PlanSA Submissions
Subject: RE: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 11:22:16 PM
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Please find attached the submission prepared by the Institute in response to the GARP Discussion Paper.

Kind Regards,

Nicolette Di Lernia FRAIA B Arch St, B Arch (Hons)
Executive Director South Australia

Australian Institute of Architects
L2/ 15 Leigh Street
Adelaide, SA, 5000

d: + 61 [redacted]
m: + 61 [redacted]
e: [redacted]
w: architecture.com.au

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.

Contact details for this submission:

Australian Institute of Architects
ABN 72 000 023 012
Level 1, 41 Exhibition Street
Melbourne, Victoria 3000
p: +61 (03) 8620 3877
Name: Reece Agland | National Advocacy and Policy Manager
Email: reece.agland@architecture.com.au

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

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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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20231106 AILA SA GARP Submission FINAL.pdf

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

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,

[redacted]

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

Dr Janelle Arbon, Fellow, Registered Landscape Architect

0438 802 365

sa@aila.org.au

State Chapter Manager

Sally Bolton

0415 555 344

sally.bolton@aila.org.au

Australian Institute of Landscape Architects, South Australia

A GPO BOX 1584 Adelaide SA 5001

W www.aila.org.au

E sa@aila.org.au

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]

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6 November 2023

AMTA

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
T: [redacted] **M:** [redacted]
E: [redacted]
W: www.ccfsa.com.au
A: 1 South Road, Thebarton, SA, 5031

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

CCF

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**		

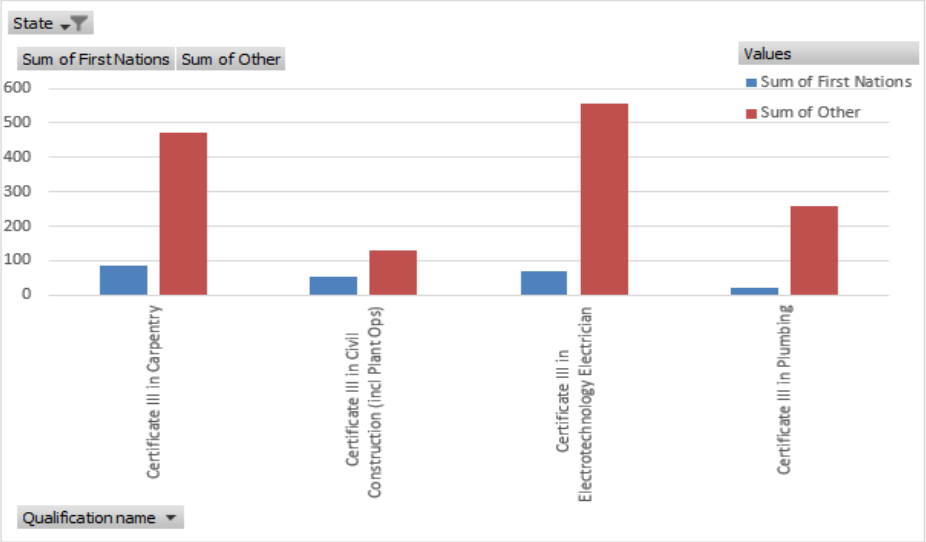
[2] Source: NCVER 2022, Apprentices and trainees 2021 - September quarter DataBuilder, Contract status, Workplace state/territory, Qualification name by Year, Quarter, Indigenous status, Numbers are rounded to the nearest 5. A dash represents a true zero. Categories are not displayed if no data are available. 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	7,417,160

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.

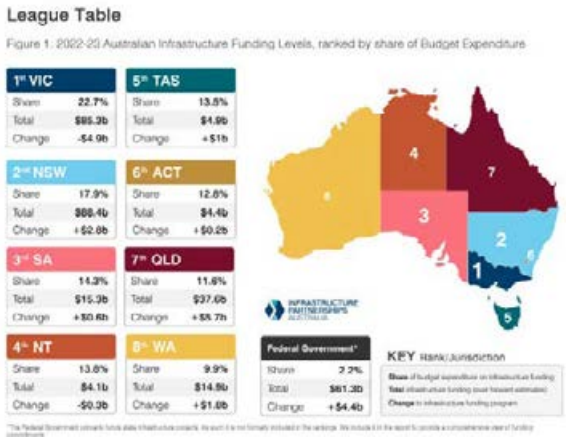
This includes $60 million to construct on and off ramps for the Southern Expressway at Majors Road which will reduce traffic on Brighton Road. It also includes $200 million to reduce congestion in Adelaide's south and improve road safety by removing the Marion Road Level Crossing and upgrading Marion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

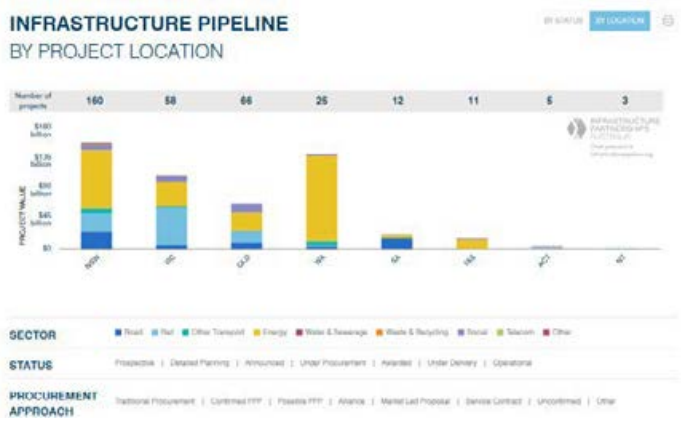
These major investments will remove a major blockage for locals' daily commute, improve safety for motorists and pedestrians, and create business opportunities across the region with improved transport flows and better amenity. The Budget investment will also include a share of a new $1.5 billion Freight 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.

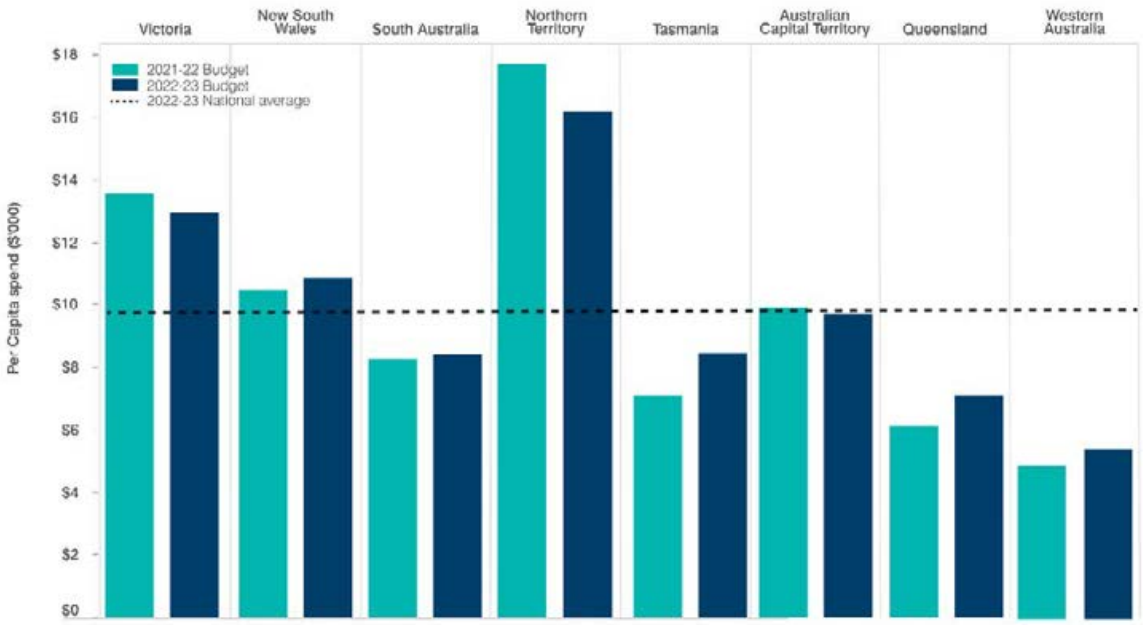




Per Capita Infra Spend Analysis

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*

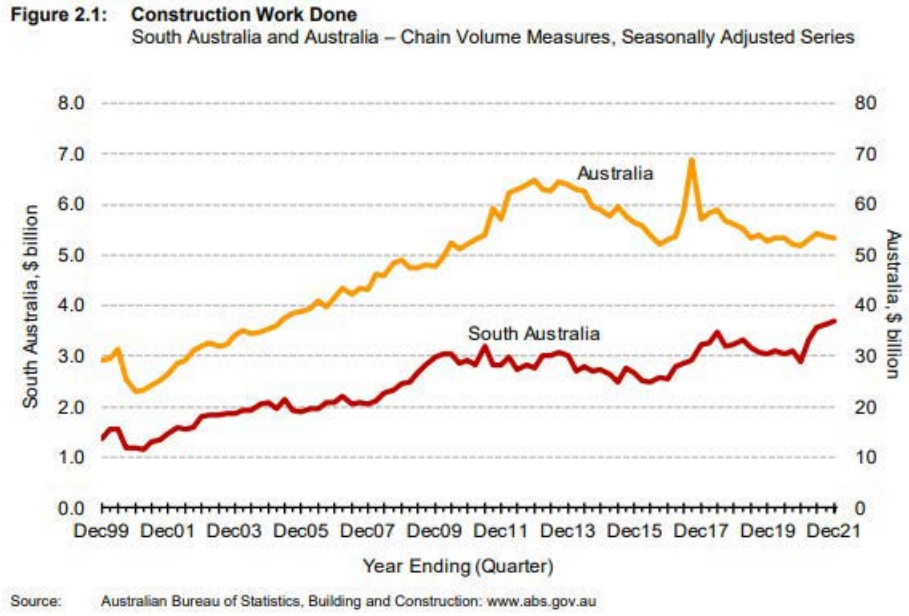
STATE OF THE SA CONSTRUCTION INDUSTRY

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).



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

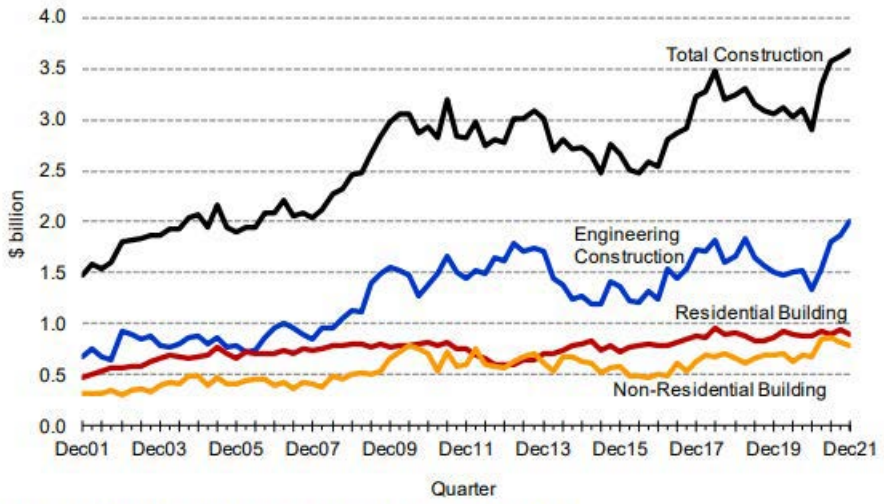
These projects include the Adelaide Desalination Plant, Adelaide oval redevelopment and various transport infrastructure projects, especially those comprising Adelaide's North South Corridor, which commenced with the Gallipoli Underpass in 2007 and the more substantive Northern Expressway in late 2008.

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.

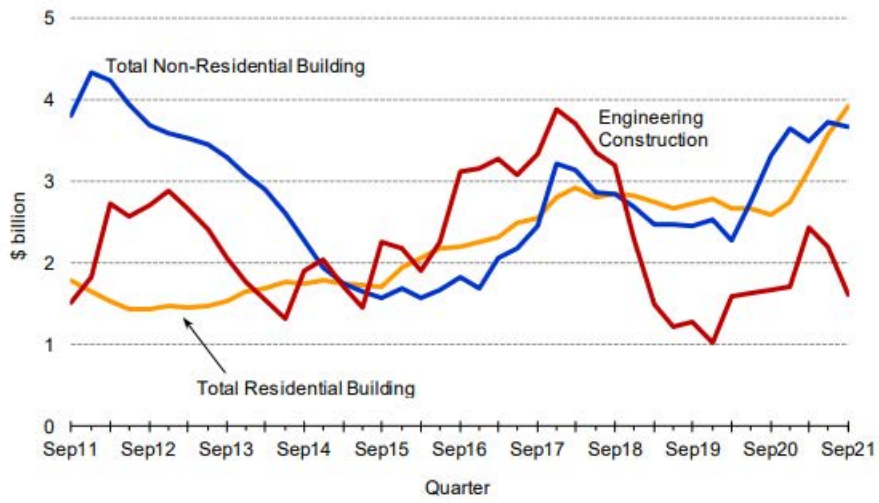
Gross value added, which is a measure of the value of industry output less the value of intermediate consumption, removes the distortion caused by imports, and represents industry contributions to gross state/domestic product. The total value added of the South Australian construction industry was $8.0 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

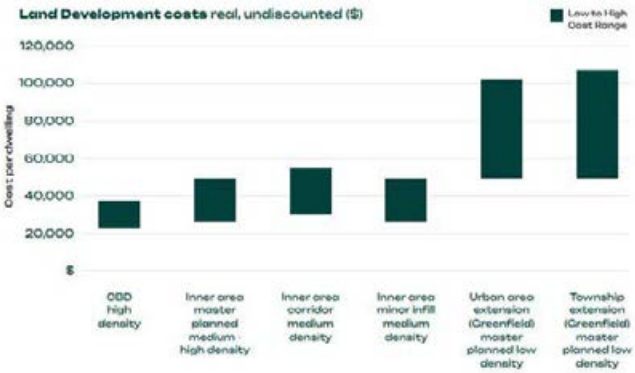
The Commission is working with Infrastructure South Australia (ISA) to identify infrastructure cost differences between infill and greenfield development. The work of ISA and other infrastructure agencies around Australia shows land development costs in urban and township extension areas can be significantly 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

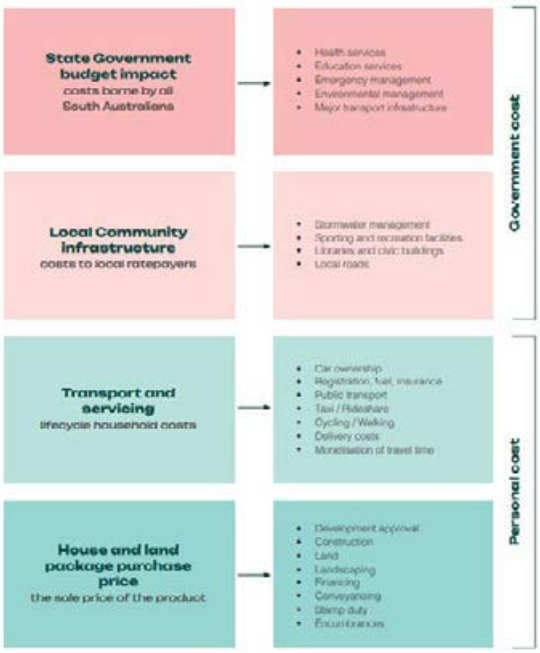
Affordability and perceived value for money often drive our decisions about where we want to live. Other influencing factors include age, family size, family ties, income, and connections to a community.

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
Web: www.communityalliancesa.org.au

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.

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.

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

Kaurna Country

Level 1, 85 Hutt Street

Adelaide SA 5000

E cotasa@cotasa.org.au

P 08 8232 0422 1800 182 324 (Country callers)

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

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[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

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[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].

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[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

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[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.

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[11] https://livingadelaide.sa.gov.au/__data/assets/pdf_file/0003/278265/Target-5.pdf).

DTI:PlanSA Submissions

From: Emilie Awbery [redacted]
Sent: Monday, 6 November 2023 10:58 AM
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Cc: Kylie Miskovski
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
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

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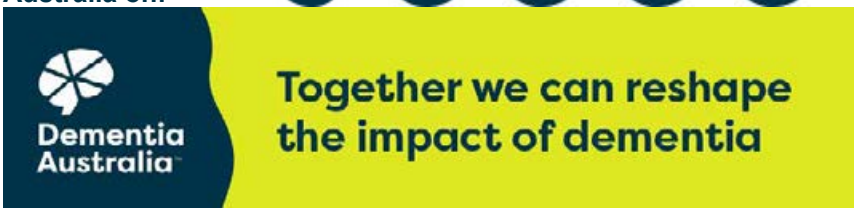

For information about dementia, advice or support phone the
National Dementia Helpline 1800 100 500

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]

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[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,

Jan Irvine *AffillEAust* (she/her)
General Manager SA & NT
M: [redacted]

South Australia Division
Level 11/108 King William St, Adelaide 5000 SA
Kaurna Country

Northern Division
9 Cavanagh Street, Darwin 0810 NT
Larrakia Country

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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.

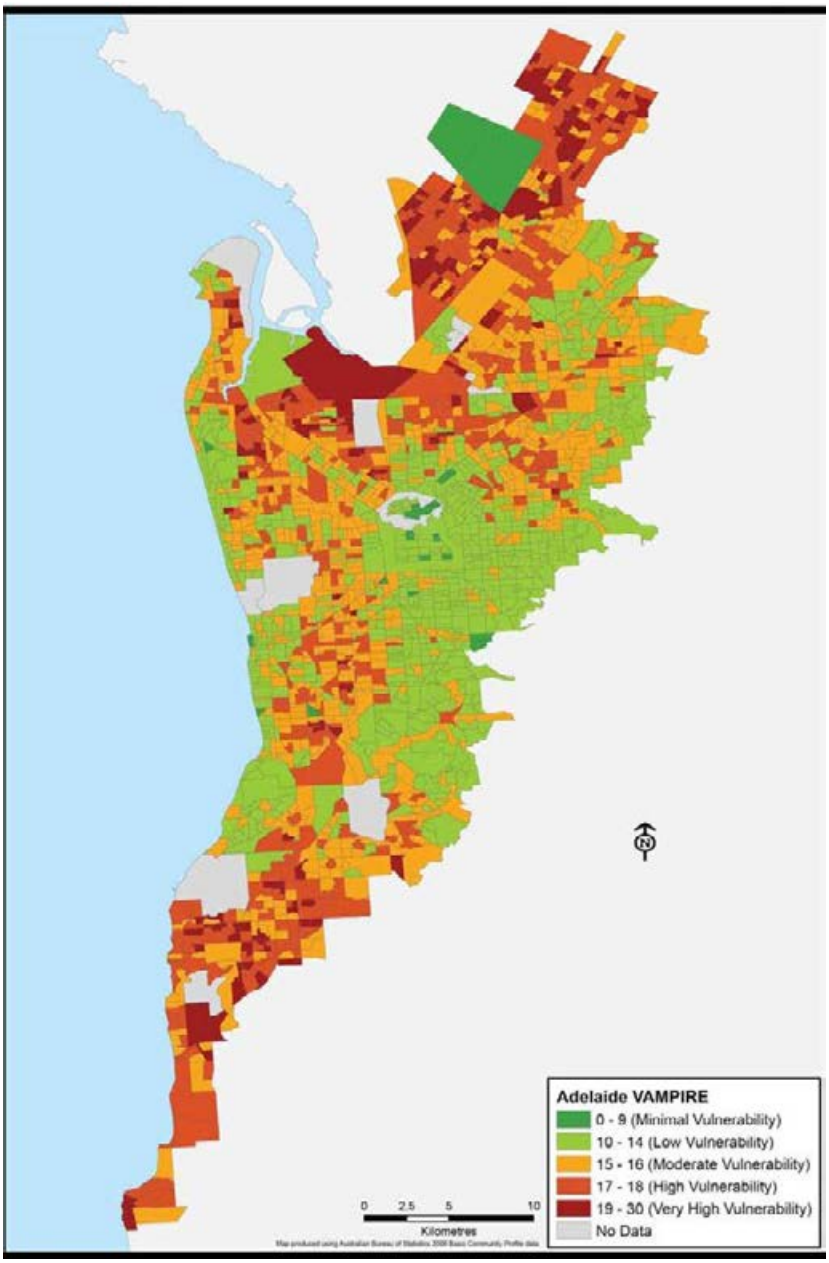
1.2. Development costs and Developer Contributions

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.

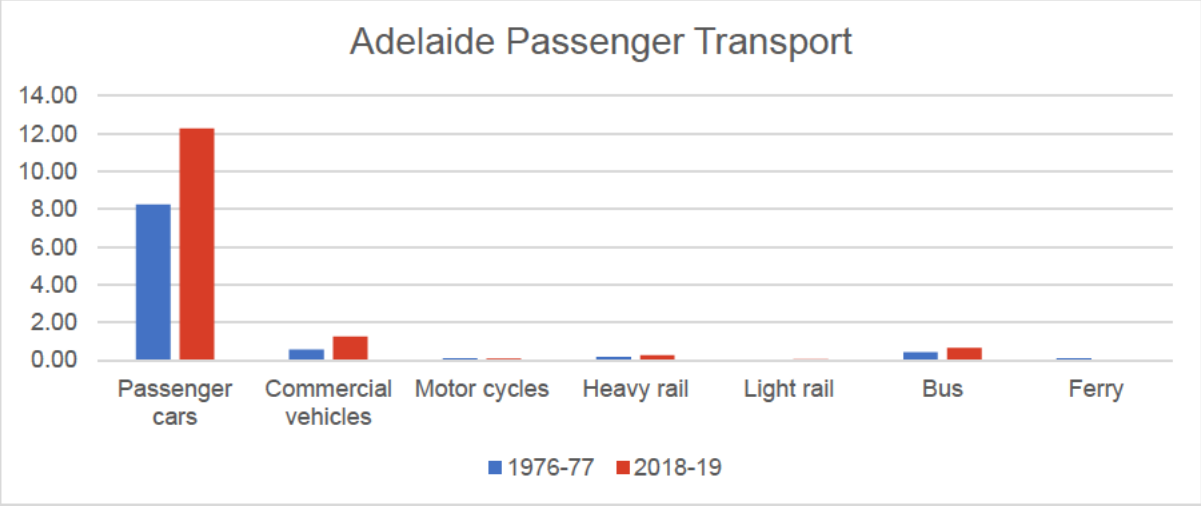


FIGURE 1 - ADELAIDE PASSENGER TRANSPORT - BN KM TRAVEL[1]

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

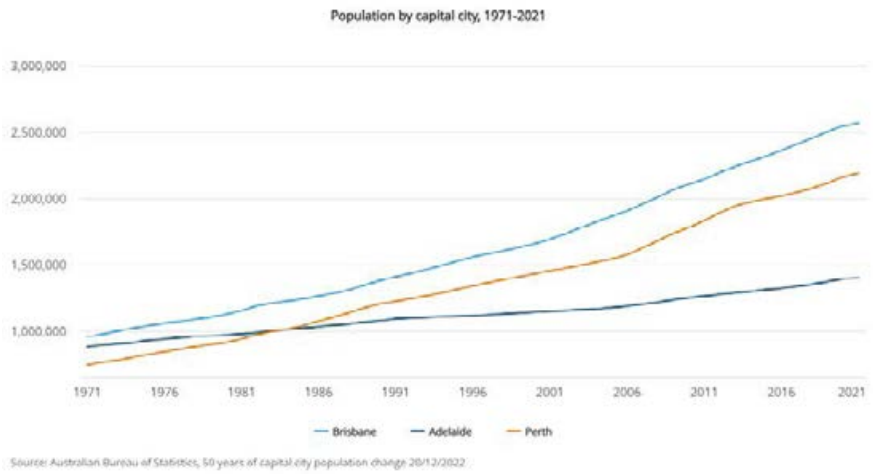


FIGURE 2 - POPULATION CHANGE 1971- 2021[2]

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
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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

Gawler Environment and Heritage Association Inc.

Email: geha1@bigpond.com Web: www.geha.org.au

Tel: 08 8522 4363 C/- 42 Finniss St Gawler SA 5118

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 30 377 936 623

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.

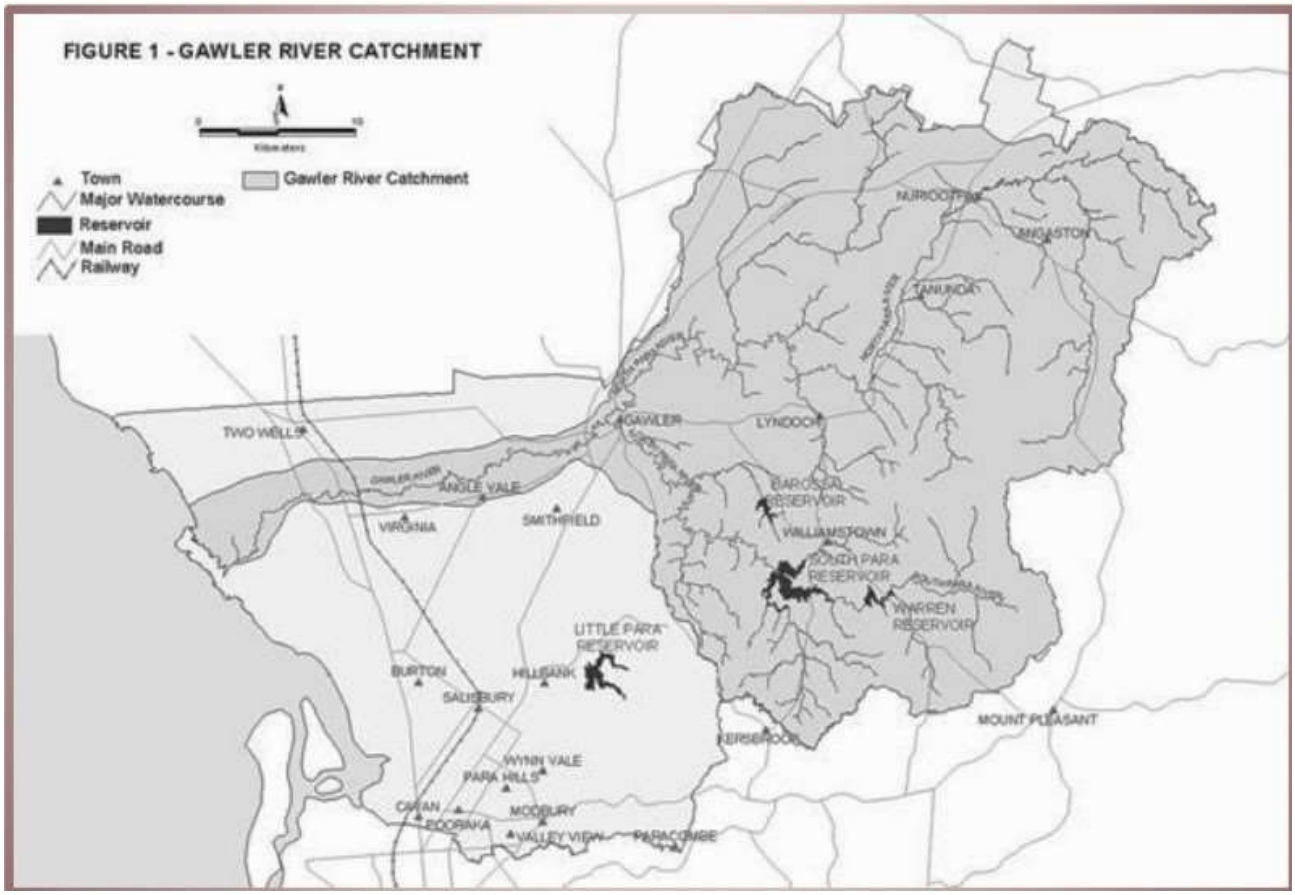
The statement suggested in the Gawler River Open Space Strategy (2009) was:

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

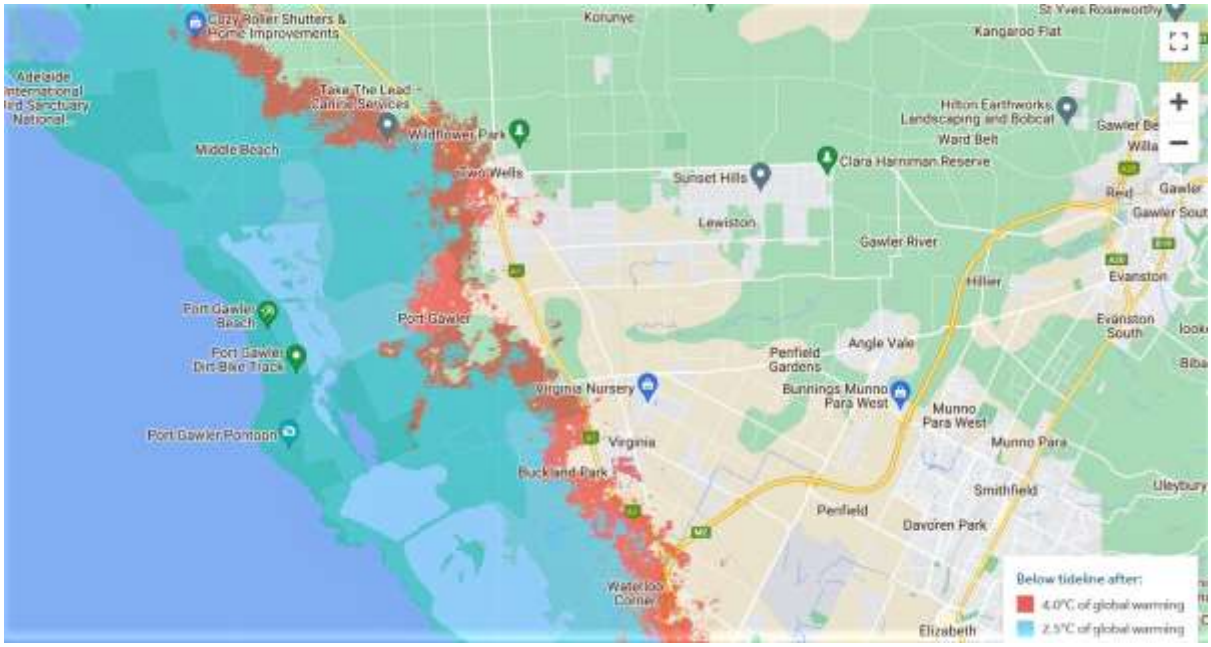
The Councils along the River, community groups and Landscape Boards are using these words more and more - WILDER, GREENER, CONSERVATION & PROTECTION, BIODIVERSITY, EMPLOYMENT, CLIMATE RESILIENT, EDUCATIONAL, REGENERATIVE, CULTURE, WALKABILITY & ACTIVE TRAVEL, OPEN SPACE, RECREATION, LEARNING, ARTS, PRESERVATION 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.

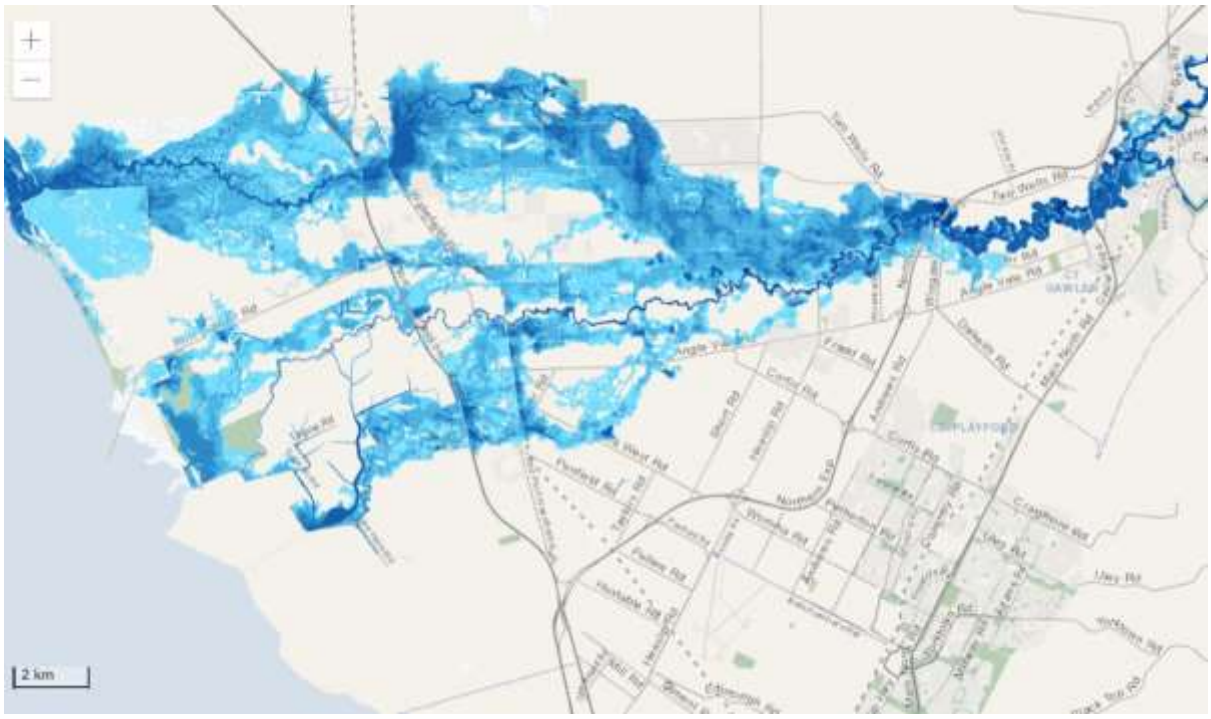
With major rainfall events it is sometimes necessary to release large amounts of water from the reservoirs in the South Para catchment and whilst there is a flood mitigation structure on the North Para, flooding still occurs across the Gawler River Flood Plain, particularly from Virginia to the sea. 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

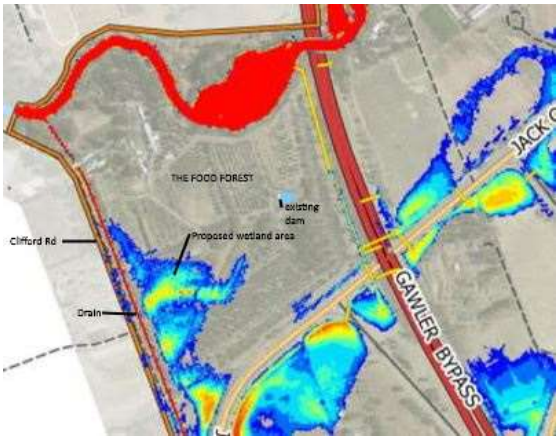
The tradition of mining the Gawler River loam deposits immediately next to the channel, then filling the excavation with urban waste, continues within a policy environment in which the owners of the land, (often right to the centre of the river channel) can do what they wish, and physical and fly-over 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.

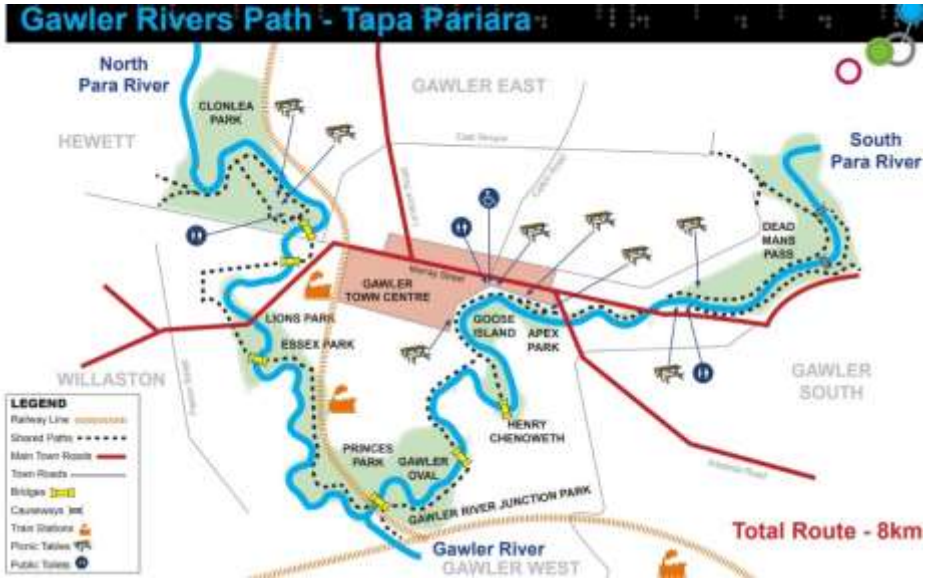
To complement existing council land along the river, extra public land has been created via purchase/land bank as well as lots arising from land division, however serious work needs to be done to make dreams of a public river corridor a reality.

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

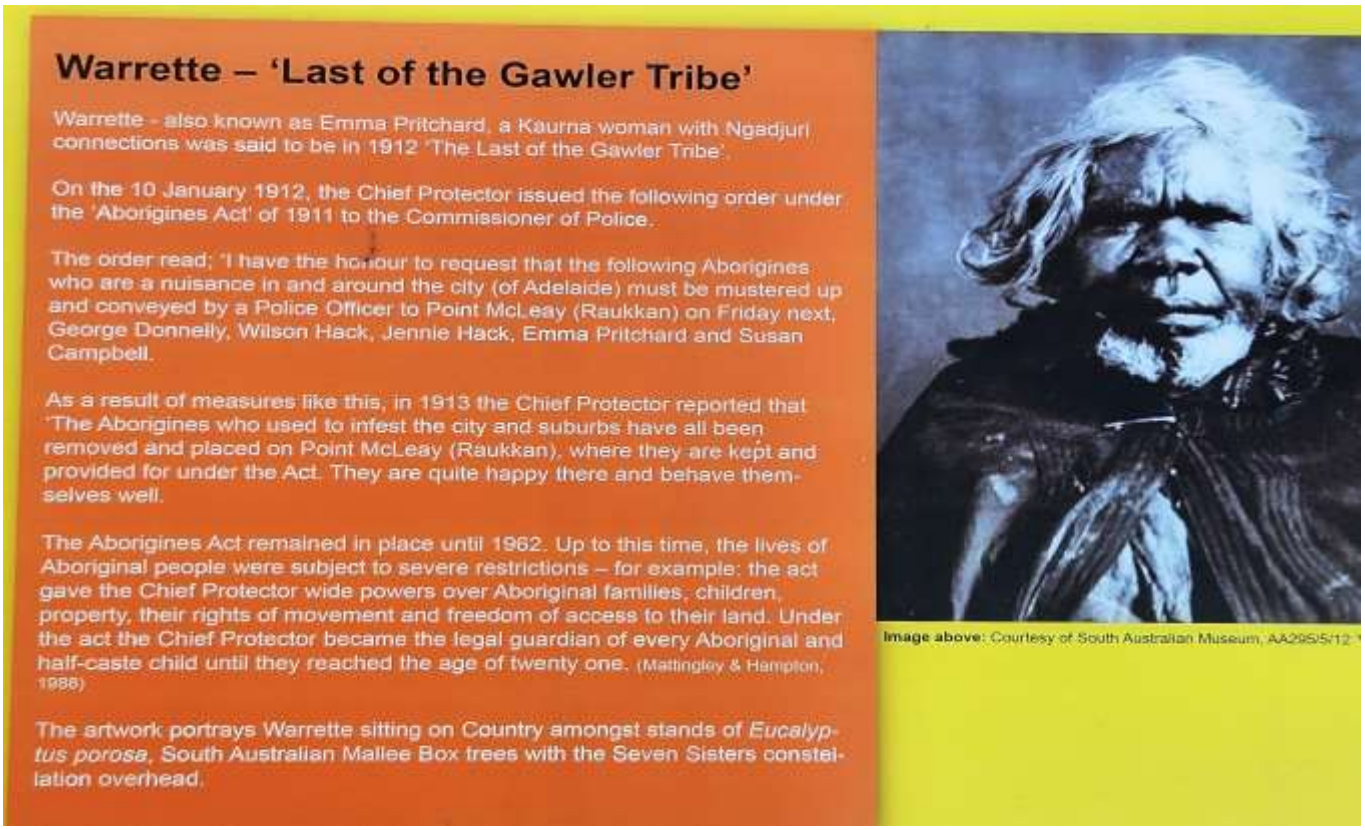
The Barossa, Light and Lower North Open Space and Public Realm Strategy points out how important trails are for tourism as well as recreation areas and visitor areas. One of the goals is to 'Work with State Government and relevant Councils to promote development of a linear park along the Gawler River from Gawler to the coast.'

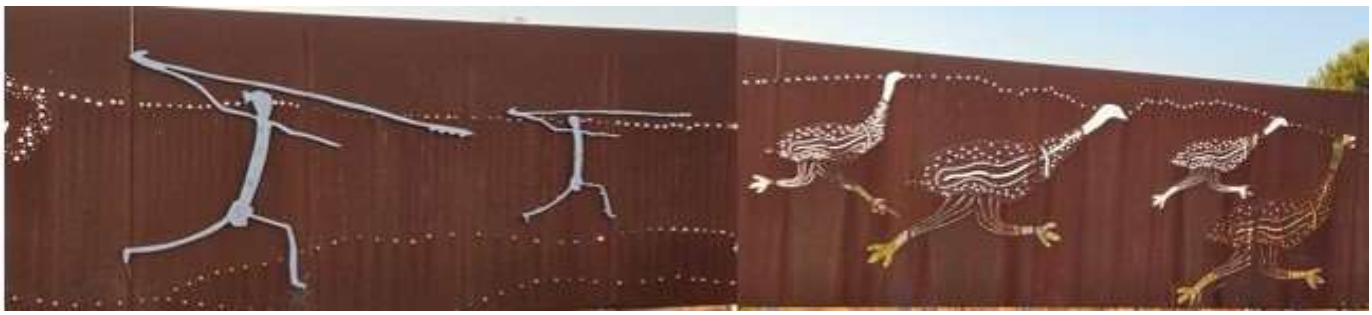
Well concieved and managed, the site would offer the opportunity for significant improvement to existing biodiversity and amenity, partiularly utilising the rainwater falling on the site and how excess storm water could be directed. The information in the URPS publication about the code amendment describes 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

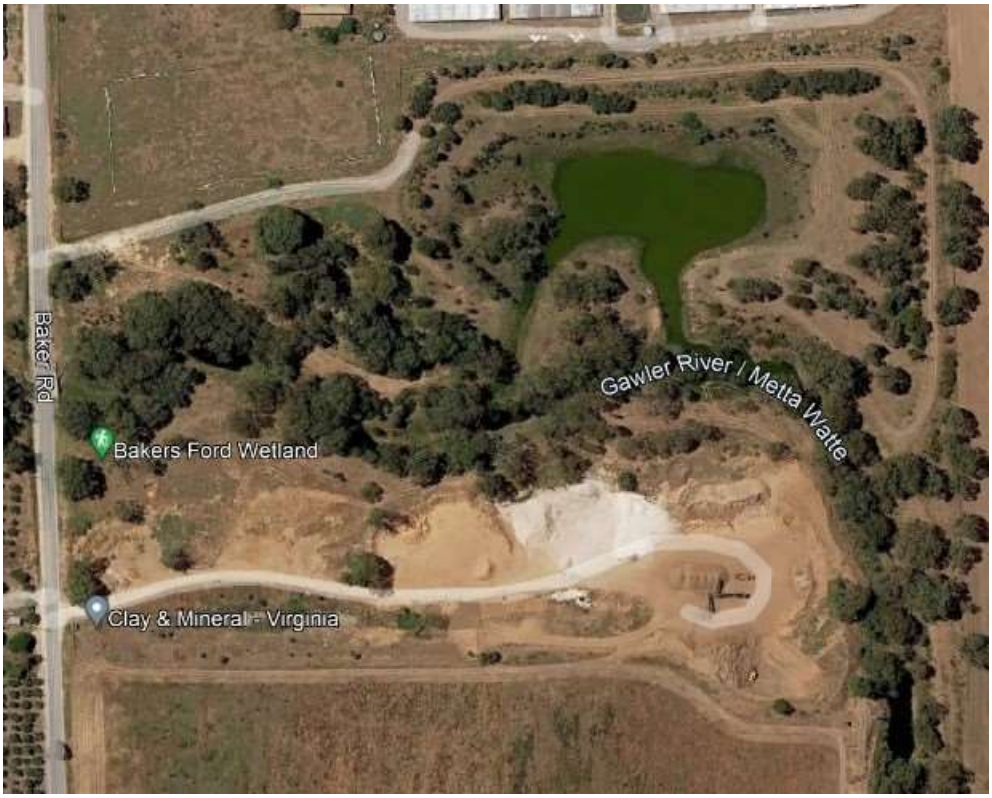
Signage and accessible website information is important in creating public knowledge of the River's natural and cultural heritage. This signage and environment art is on Gawler's Eastlink Road.





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).

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

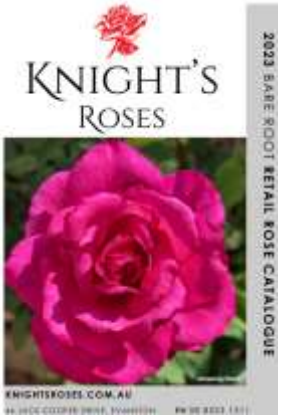
Some of the area has access to good quality groundwater and the Virginia Pipeline scheme reaches the western area with recycled water for irrigation. There will be significant sale of properties west of Hillier as suburban subdivision proceeds around Angle Vale and Virginia that will make more water 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.

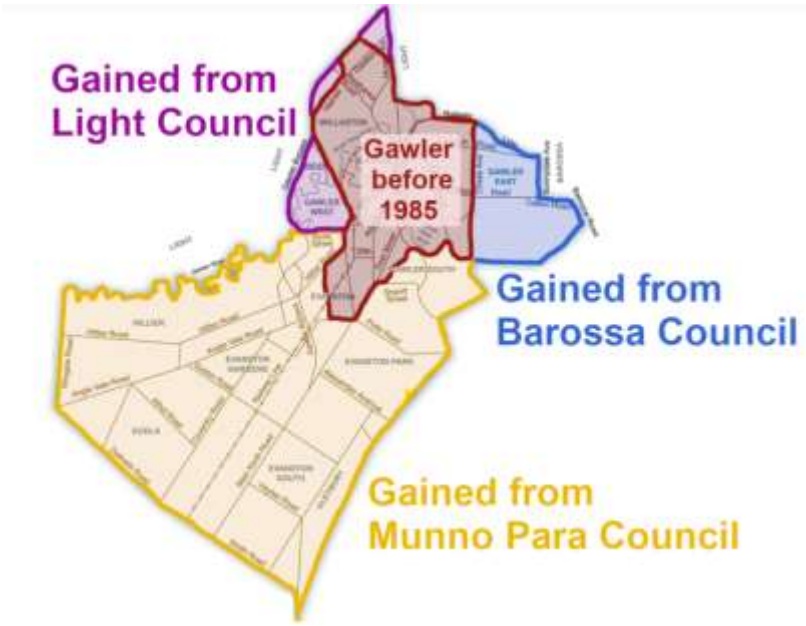
Producers like these will readily adopt new and more efficient/sustainable ways of using their land but it is expected that, once the GARP has provided a lead in terms of regional planning and zoning, there will be a number of landholders who will offer their properties for sale or swap, so the area 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.

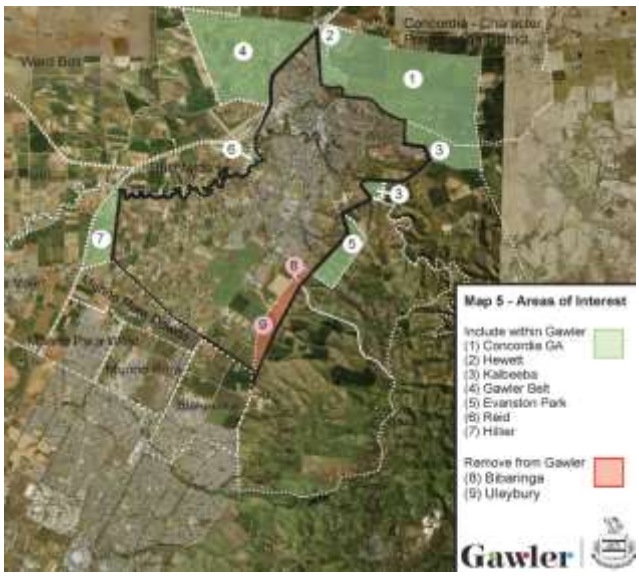
Protection and Land Valuation

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

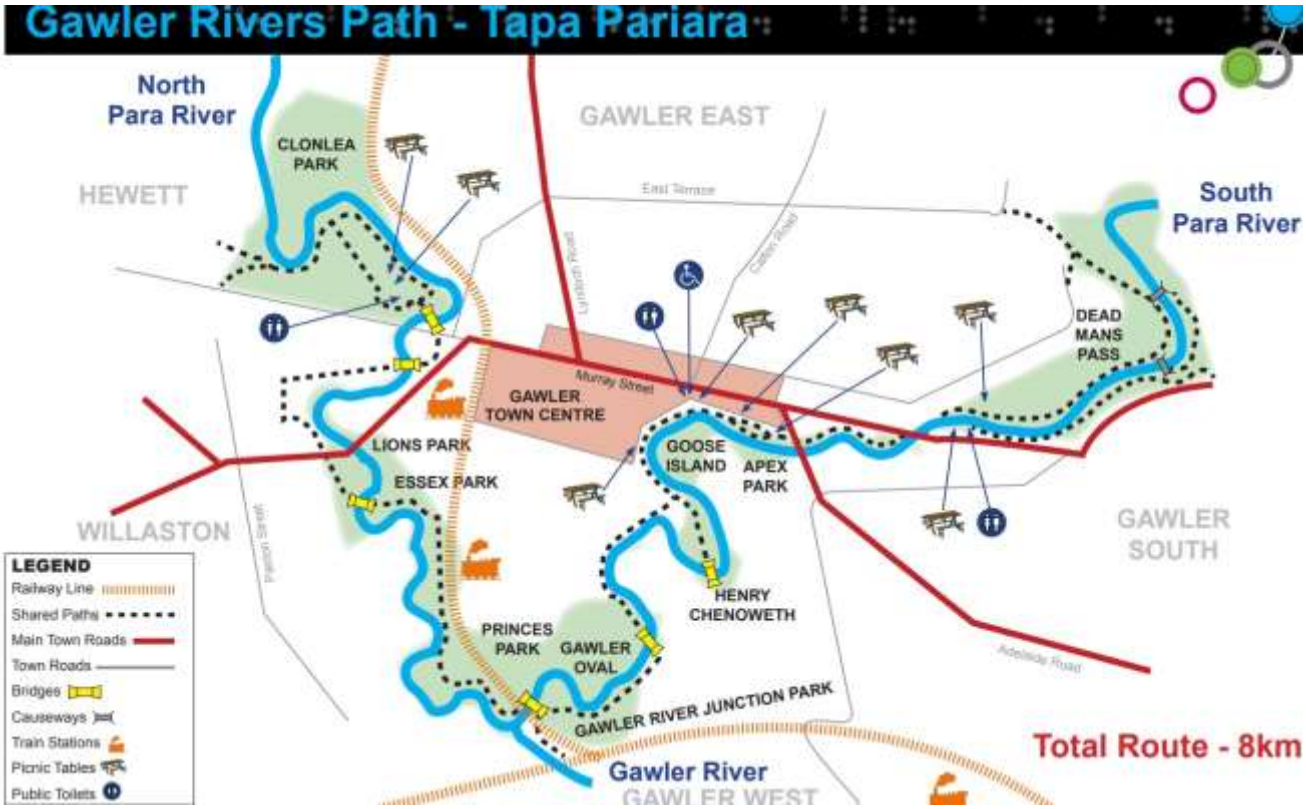
The Gawler River catchment was managed by the Kaurna people at the time of European settlement and was recognised by both groups as one of the best areas of South Australia for harvesting indigenous foods and the cereal crops British settlers brought with them. Along the river system are some of the 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



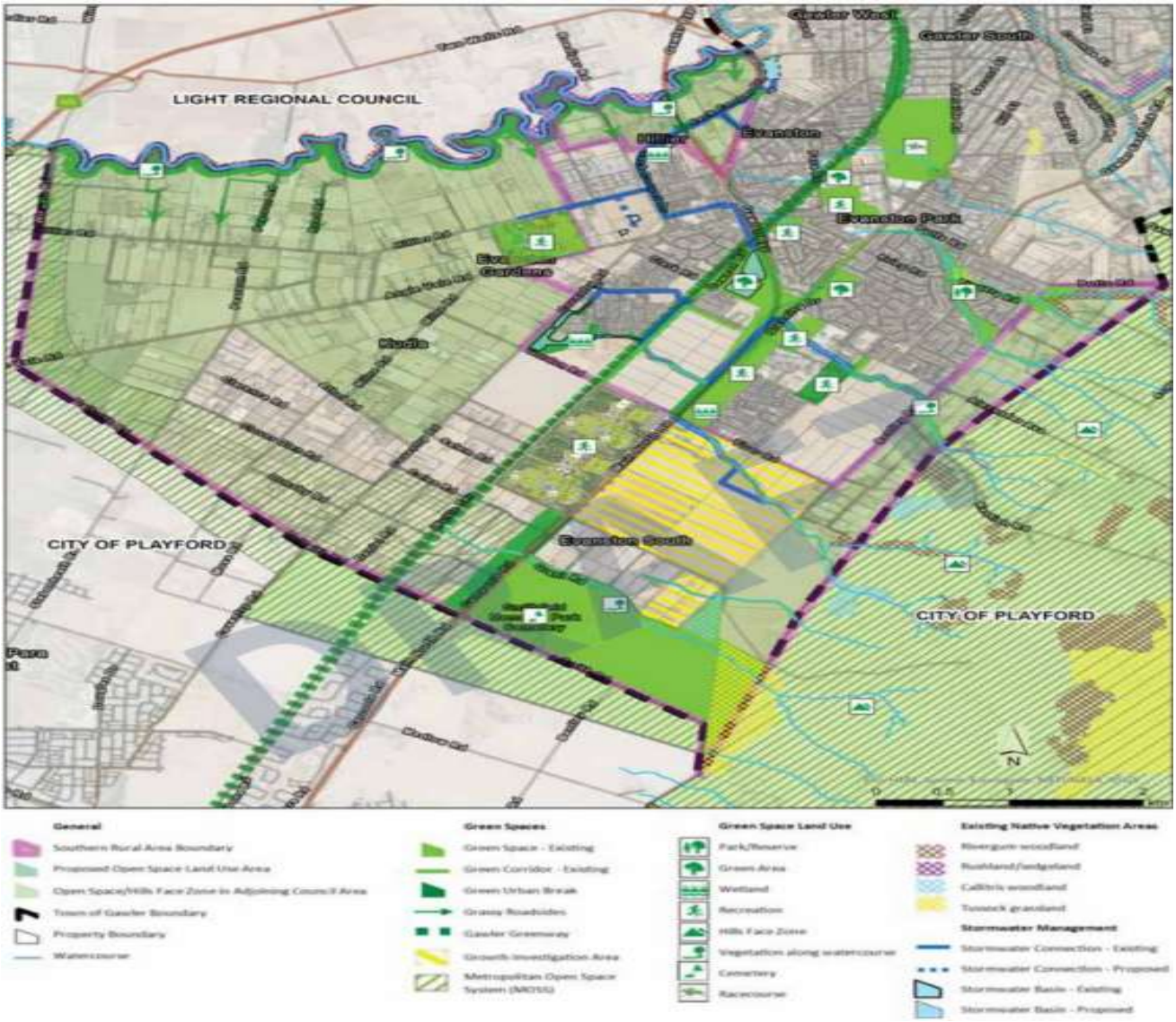
Having successfully integrated enhanced indigenous biodiversity, active transport trails and low level bridges in an effective network through the town, the Council is proposing that the Gawler River Corridor be widened and protected from loam mining, waste dumping and urban incursion. Ultimately the 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.

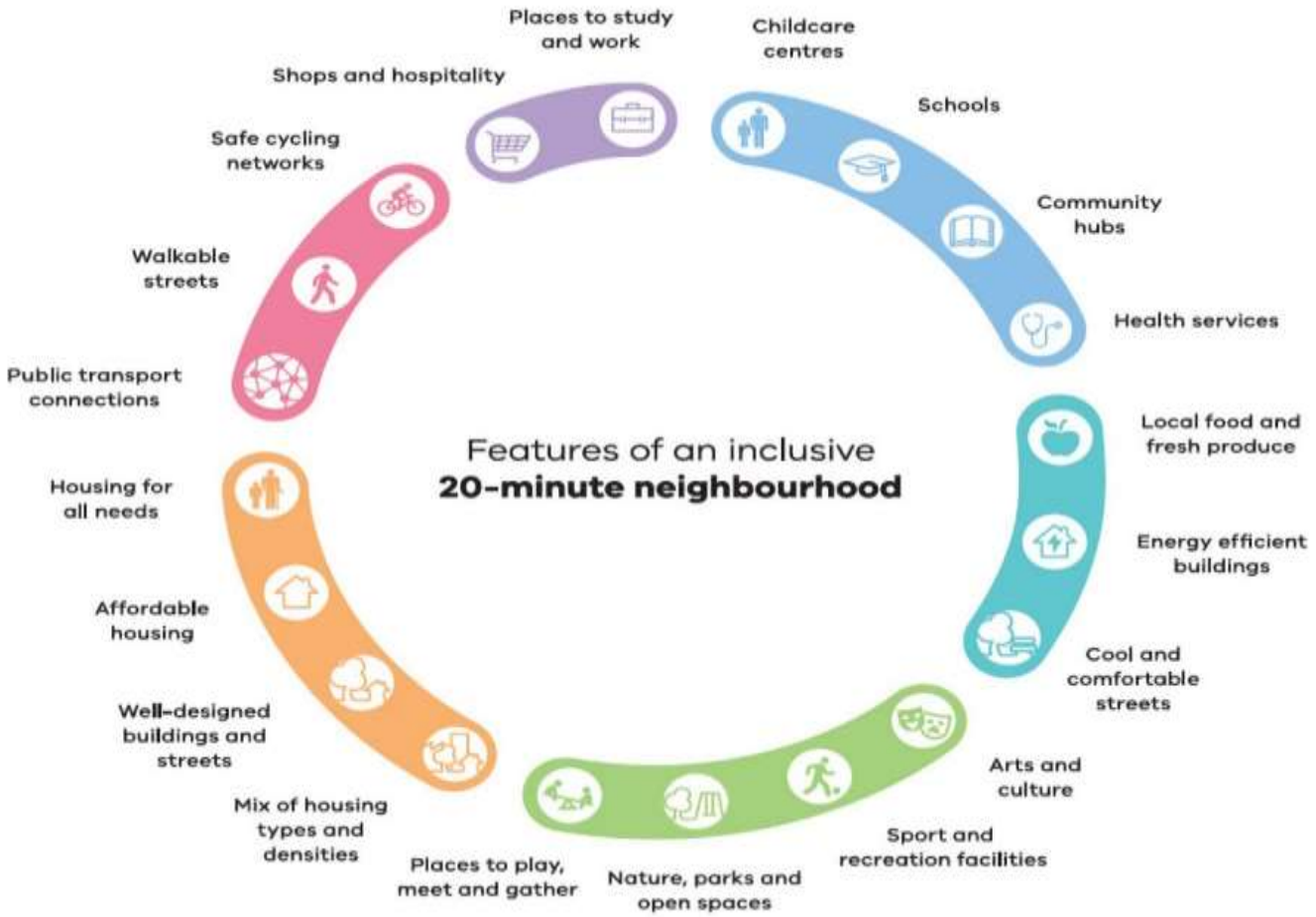
The concept of an *urban food bowl* that harnesses the unique natural resources of an area that could have been converted into residential suburbs, has been implemented successfully in Barcelona, a city of roughly the same size as Adelaide and is eminently feasible on the land adjacent to the Gawler 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.

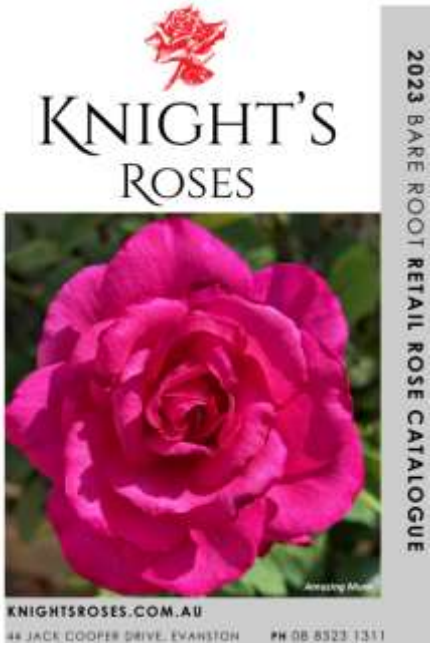
The Brookmans provide employment for up to 15 people in growing, harvesting, processing and marketing some 150 lines of fruit, nuts, herbs, vegetables, wine, cider and vinegar. They are breeding short statured sheep for use in Horticultural properties.

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: DTI: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,

[redacted]

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.

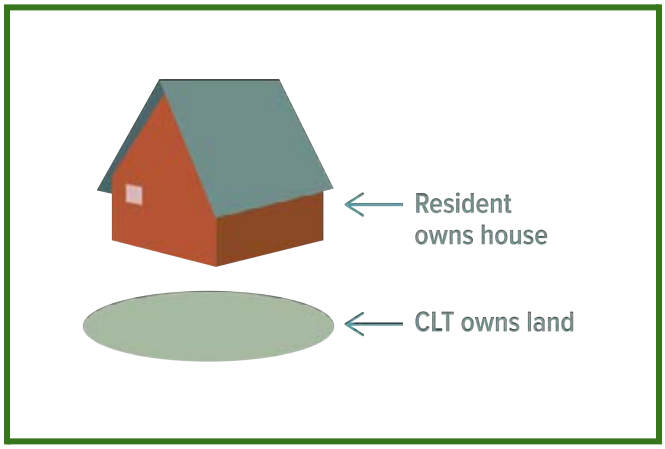

Image: Grounded

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:

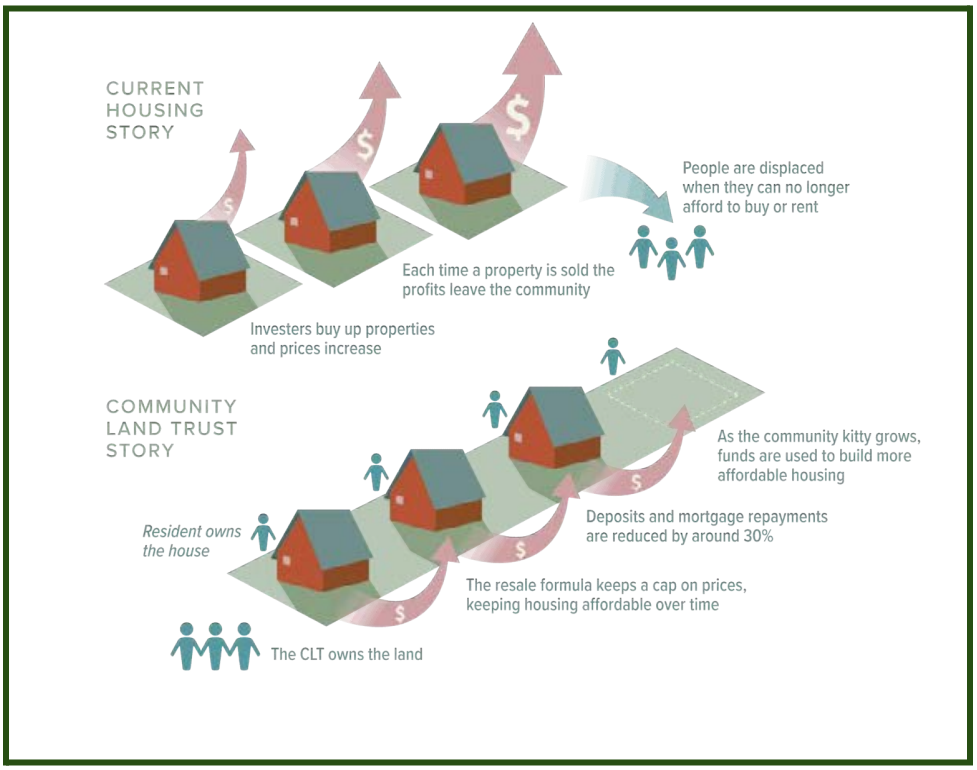

Image: Grounded

- 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).

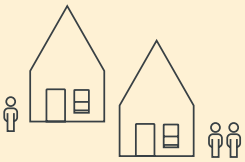
Homes for Homes is a long-term, sustainable solution to homelessness:

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

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

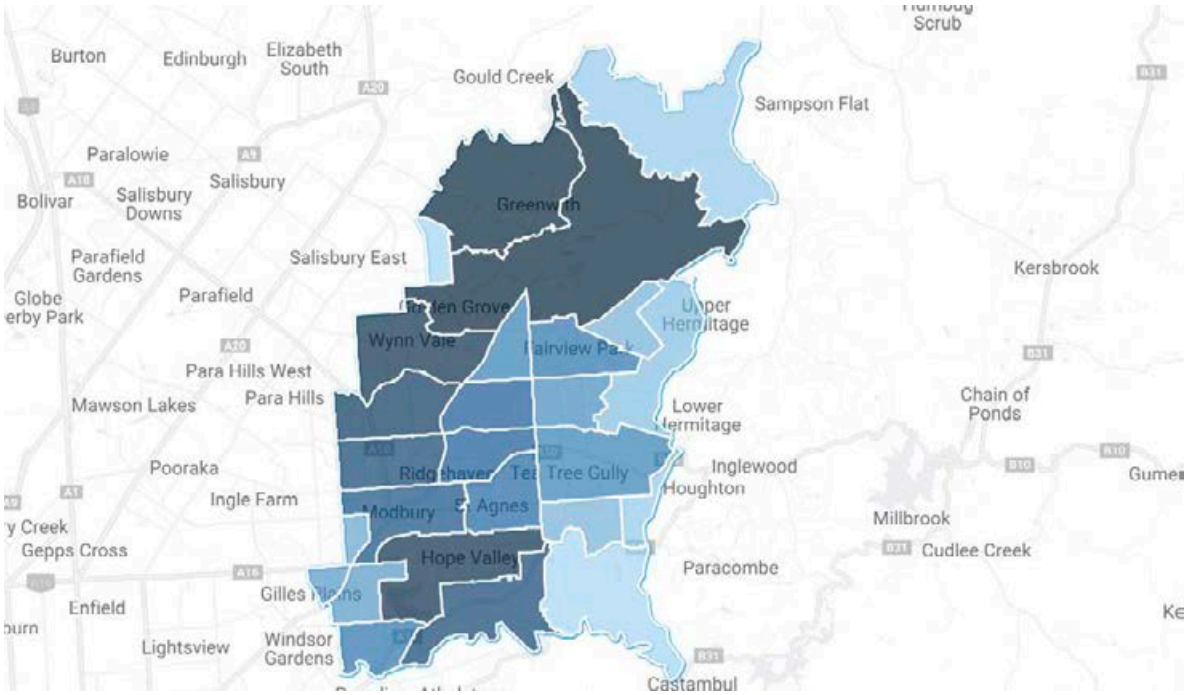
Homes for Homes and Tea Tree Gully Council

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.

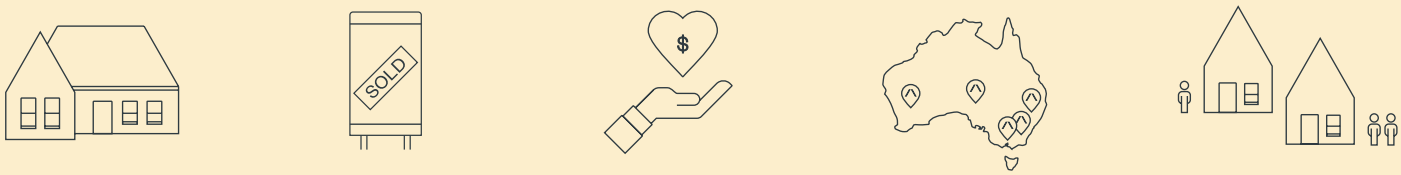
Homes for Homes

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

Contact Sally Curtis, SA Partnerships Manager, Homes for Homes
T: 0429 263 525 E: scurtis@homesforhomes.org.au
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 City of Marion and the potential donation value from property participation in Homes for Homes.

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).

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.

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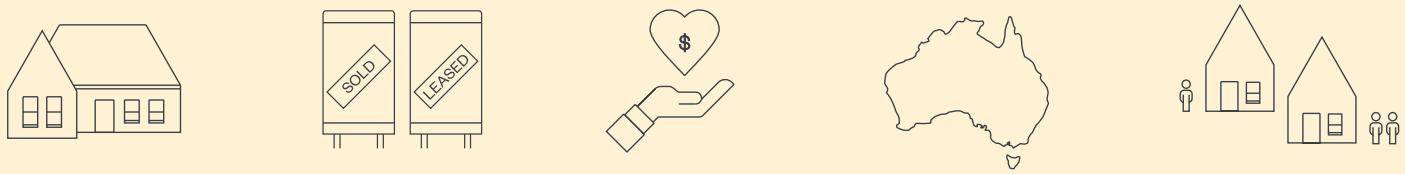

1. Homes registered
2. Properties sold or leased
3. Funds donated
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5. Homes created

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.
- 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 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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Homes for Homes

Homes for Homes and City of Onkaparinga

January 2023

Homes for Homes

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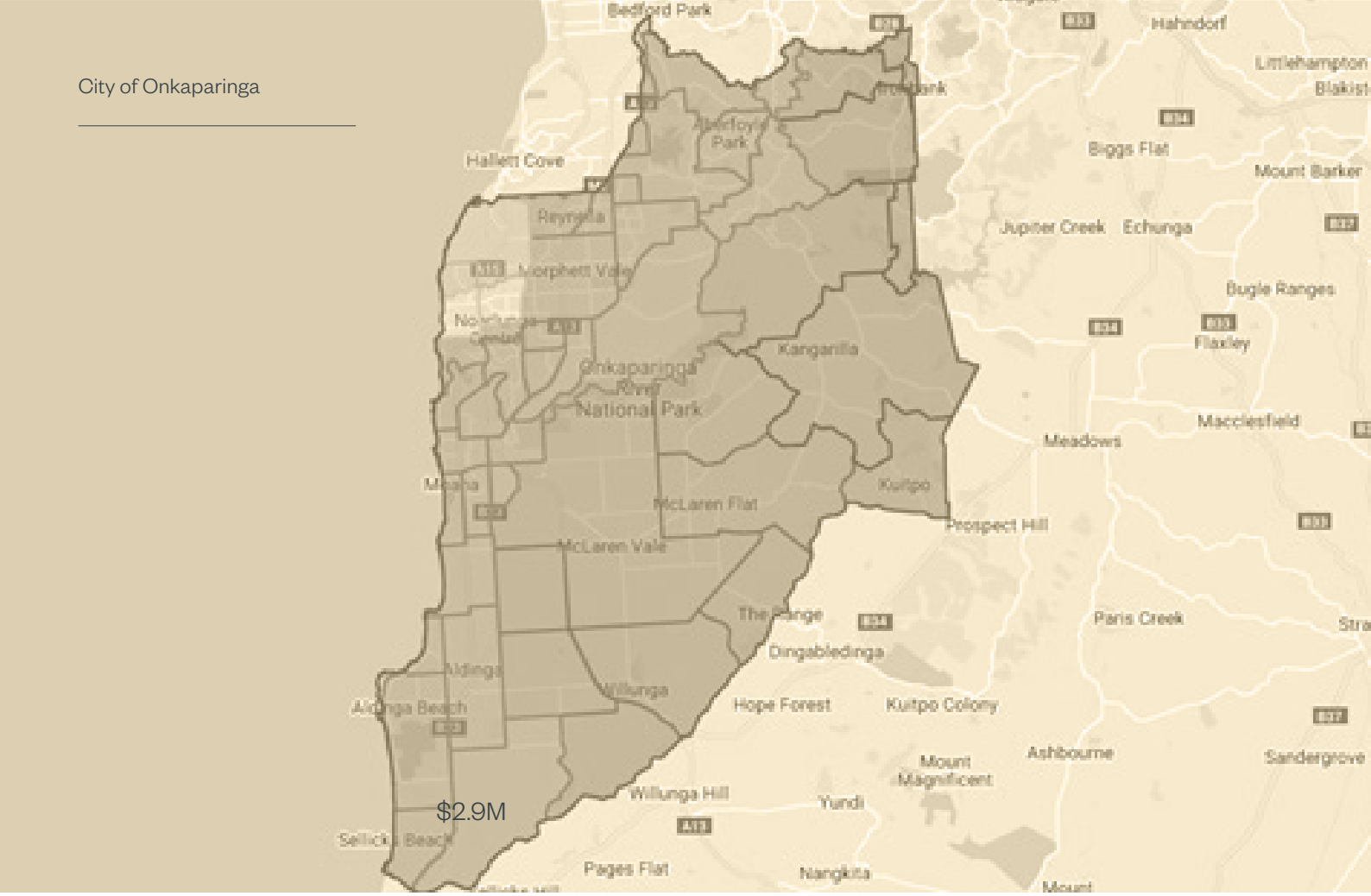

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For instance:

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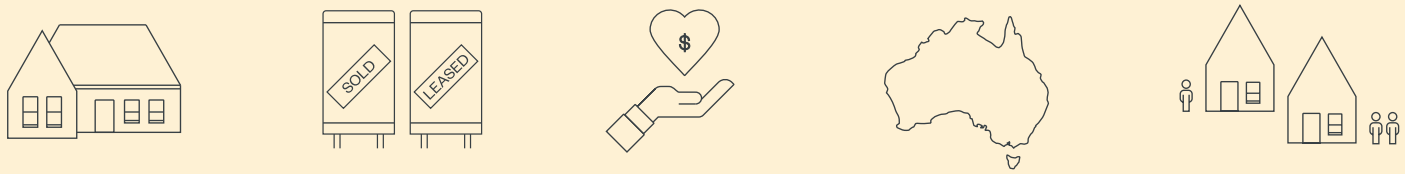

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City of Onkaparinga – demographic snapshot

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.

According to realestate.com.au in May 2022 the median house prices in the City of Onkaparinga were as follows:

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

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.

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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 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.

Homes for Homes

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

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

Dear Sir/Madam,

Please find attached HIA's submission for the Greater Adelaide Regional Plan.

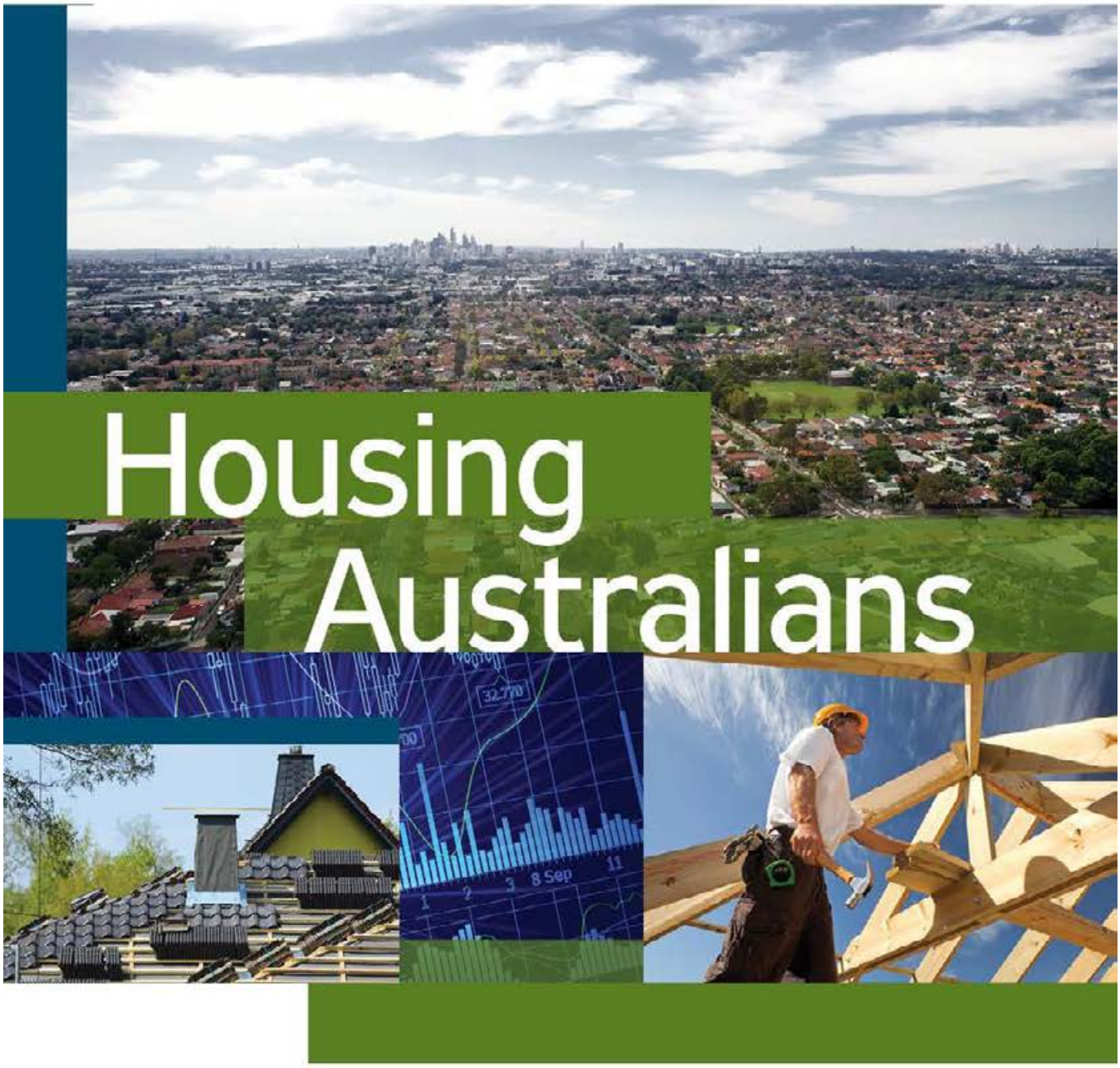
If you have any question, do not hesitate to call me.

Regards,

Chris Wiltshire
Assistant Director – Planning, Building and Environment
[redacted]

Housing Industry Association Ltd
Cnr Port Road and Station Place
Hindmarsh SA 5007
1300 650 620
hia.com.au

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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Housing Industry Association contact:

Stephen Knight
Regional Executive Director - SA
Housing Industry Association
Cnr Port Road and Station Place HINDMARSH
Phone: [redacted]
Email: [redacted]

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**

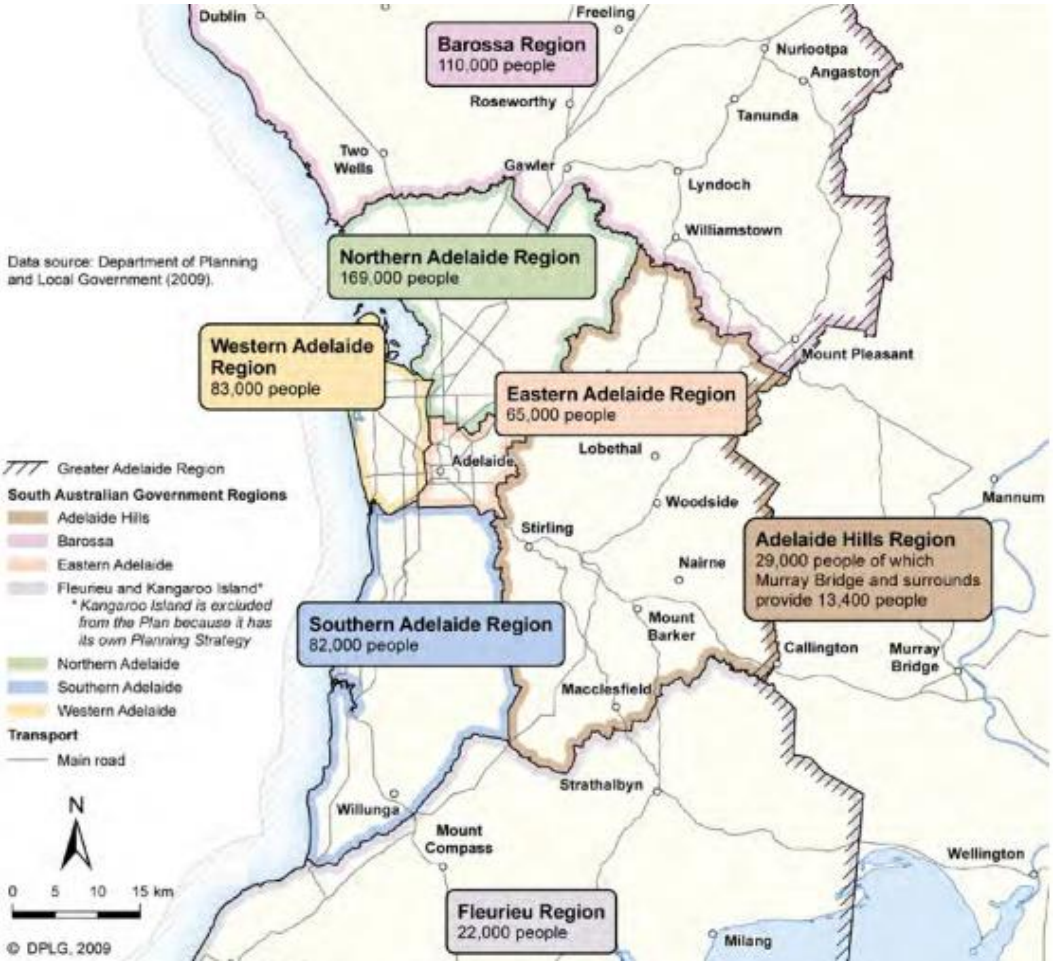
The following observations were made up to 2021.

- **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

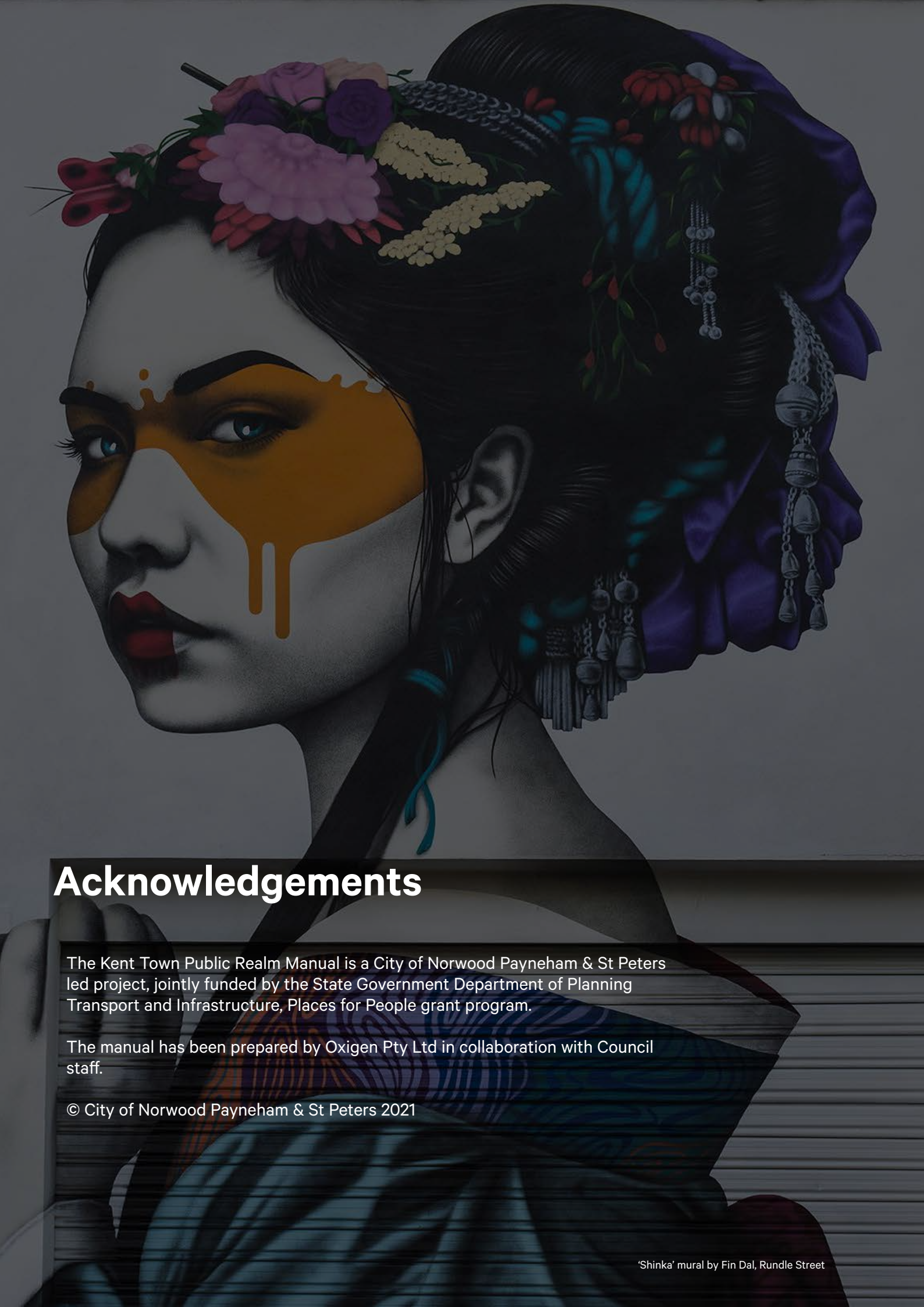
Discussion Paper Questions – Major trends and land use plan drivers (page 6)

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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01

Introduction

St Peters Street

St Peters, SA

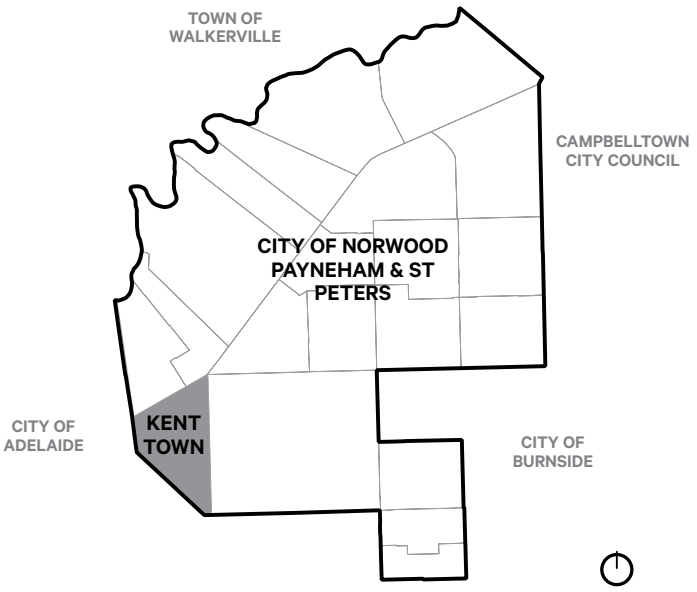
Introduction

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.

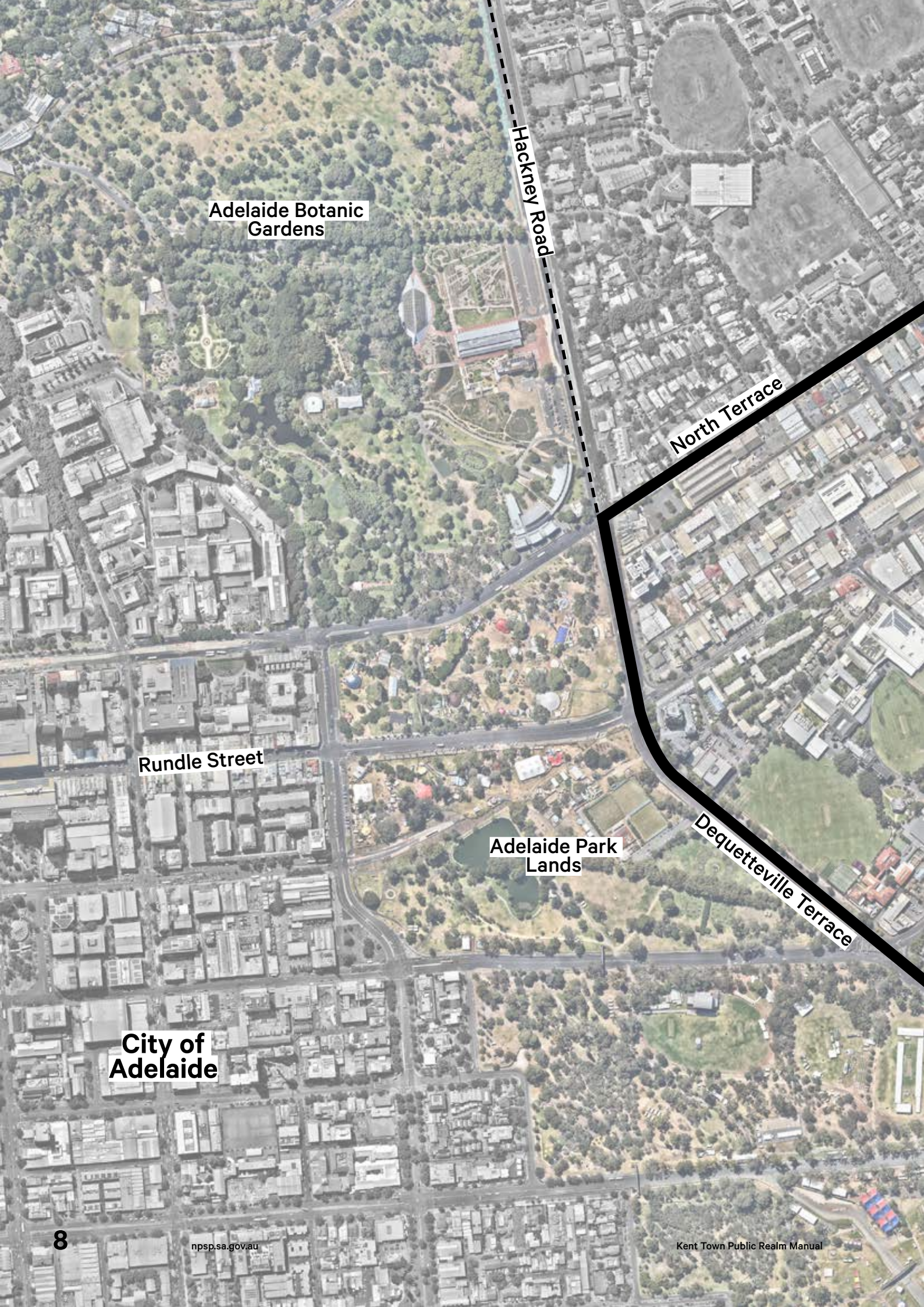
Public Realm Elements outlines the guiding principles and specifies the palette of standard materials to be used in the design and construction of new public realm capital works projects or development related upgrades. The elements include paving and surfaces, furniture, planting, wayfinding and signage, and public art.

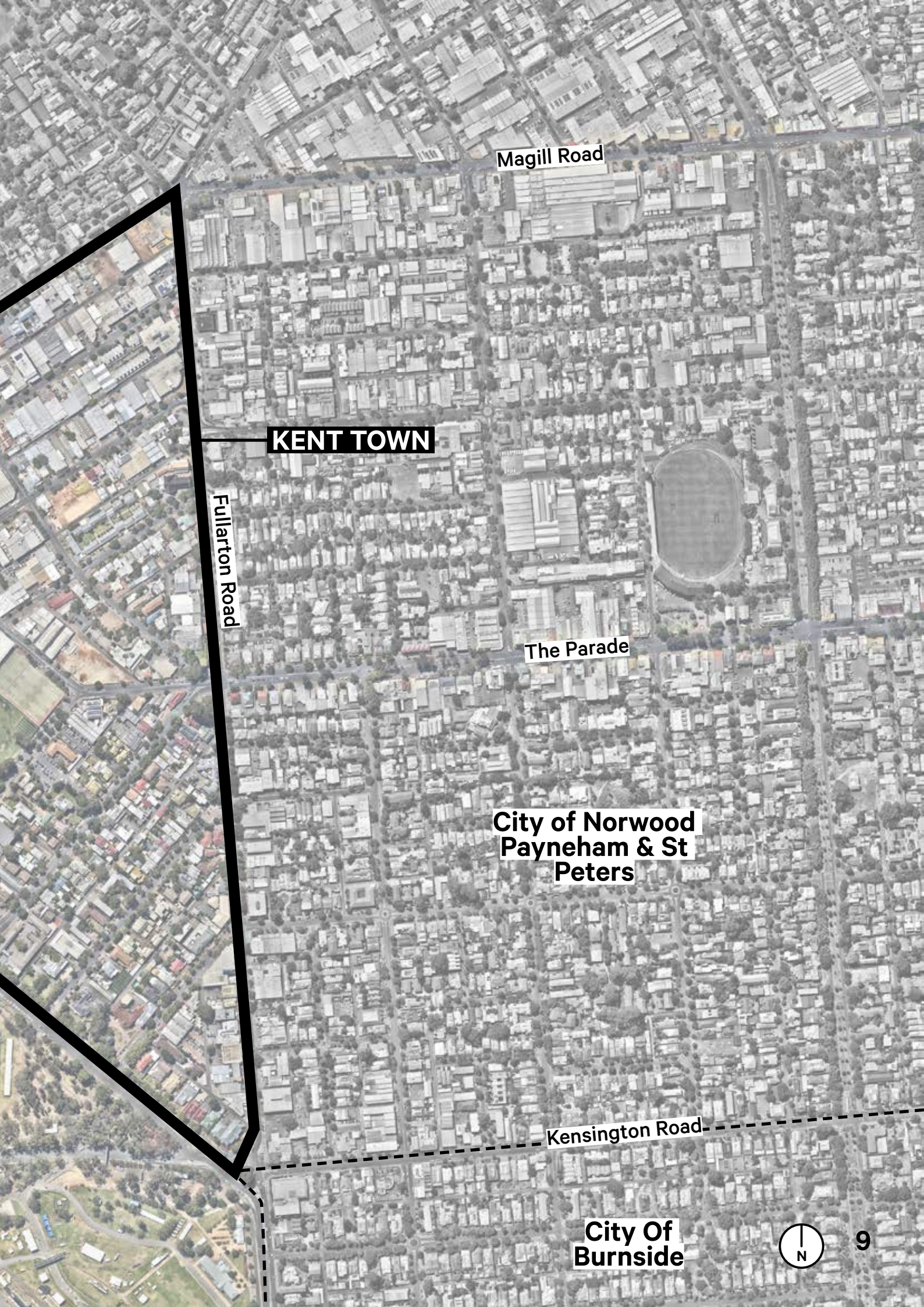
Objectives

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.

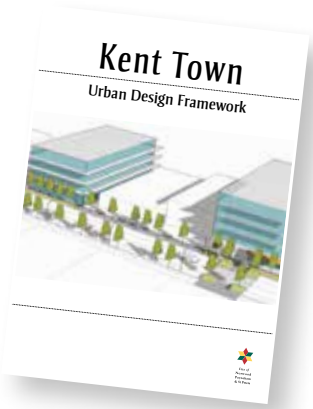
Mural by Jimmy C, Rundle Street


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.

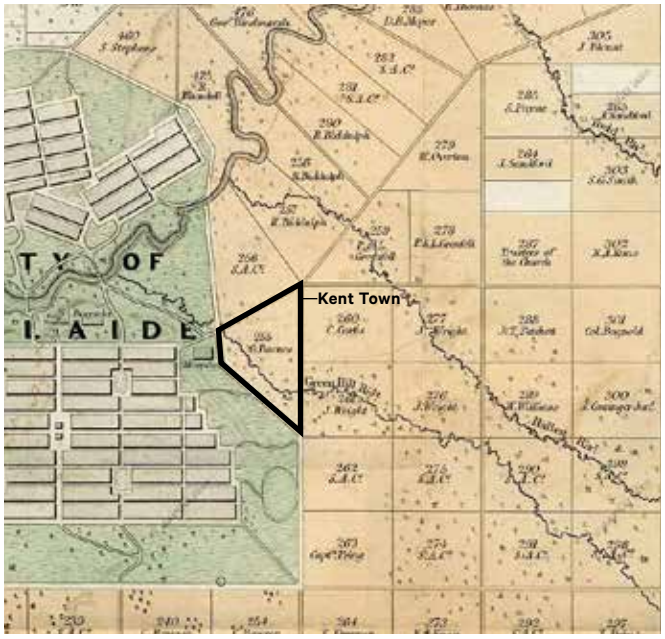
Kent Town was named after Dr Benjamin Archer Kent. He arrived in South Australia in April 1840 and erected a timber cottage in a grove of wattles on the corner of Rundle Street and Dequetteville Terrace. For a number of years Dr Kent's house was the only building between the City and Kensington Village 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.

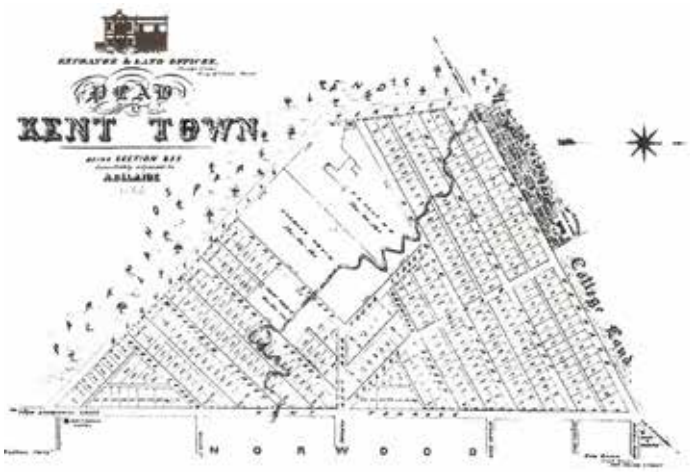
Kent's land was sold to Charles Robin, who paid compensation to Dr Kent and reserved for him thirteen acres on which East Park cottage stood.

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.

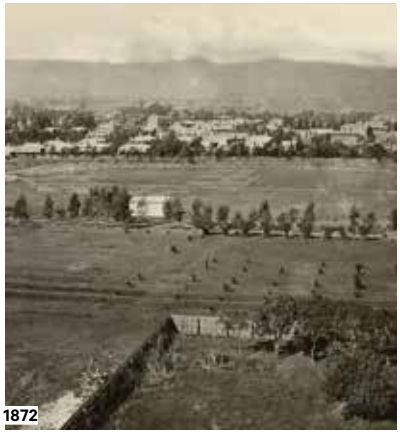


Plan of the District of Adelaide, 1839



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

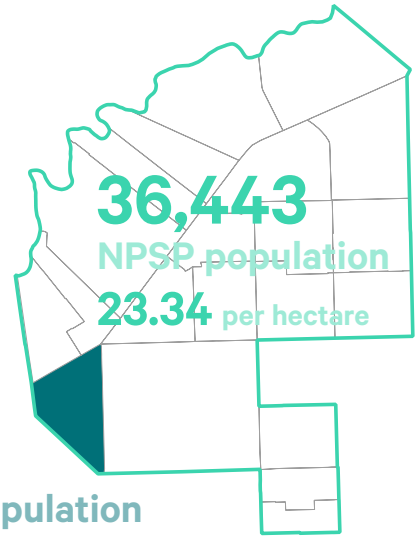
Kent Town is located within the South West corner of the City of Norwood Payneham & St Peters and is bound by Dequetteville Terrace, North Terrace and Fullarton Road.

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

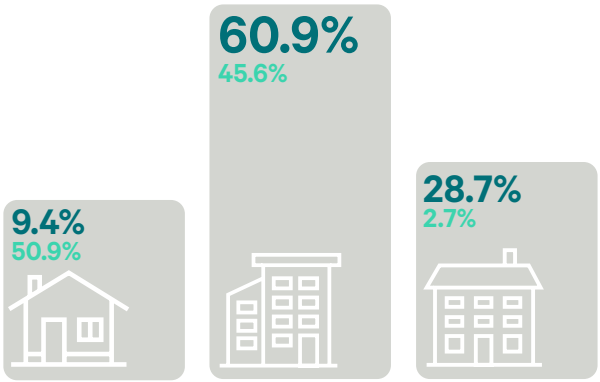
Kent Town
NPSP



36,443
NPSP population
23.34 per hectare

1,210
Kent Town population
19.95 Persons per hectare

HOUSING



Low density | Medium density | High density

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

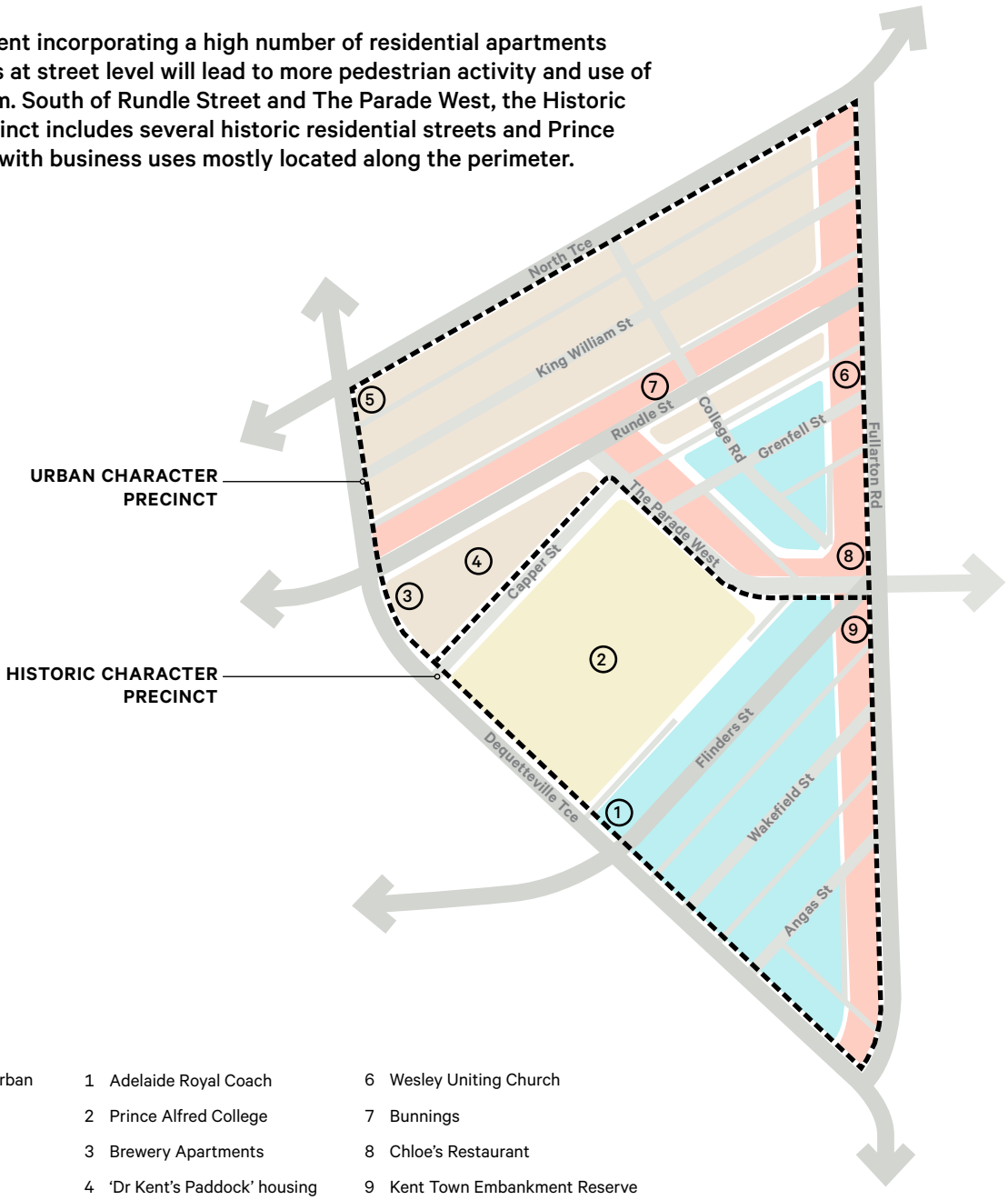
Photos of Kent Town now

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

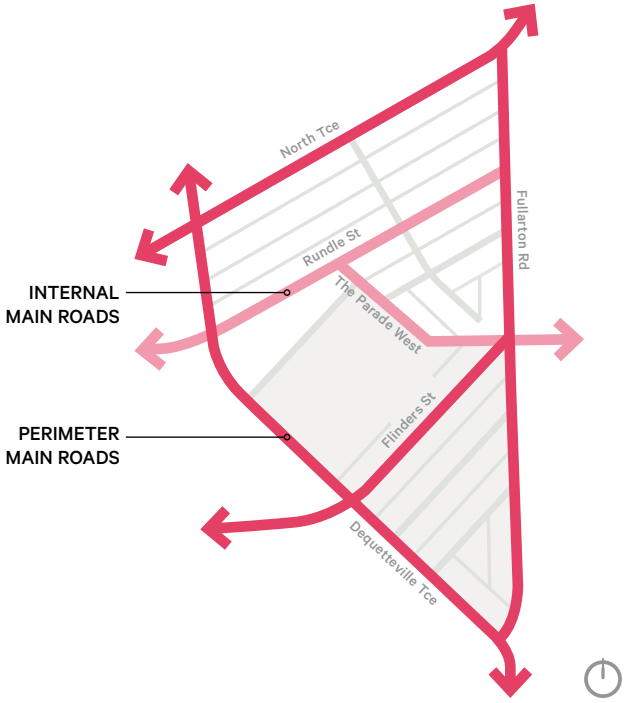
St Peters Street

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.

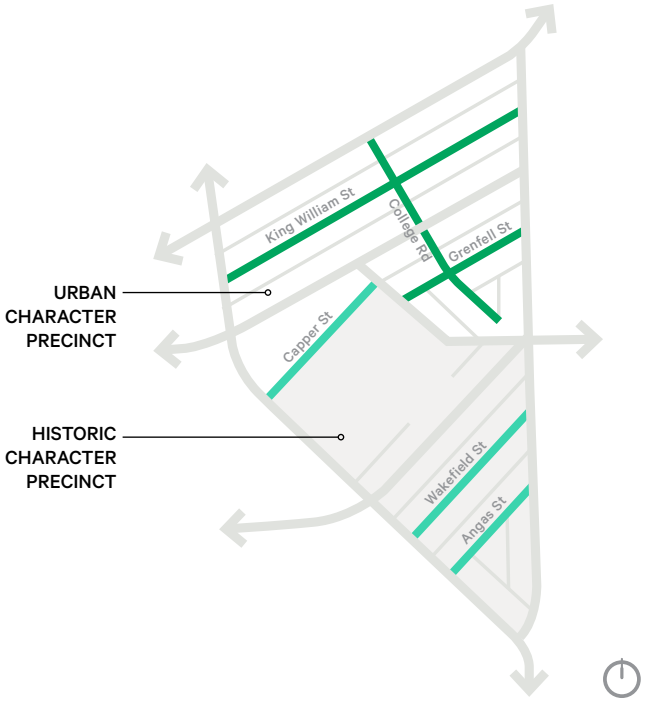


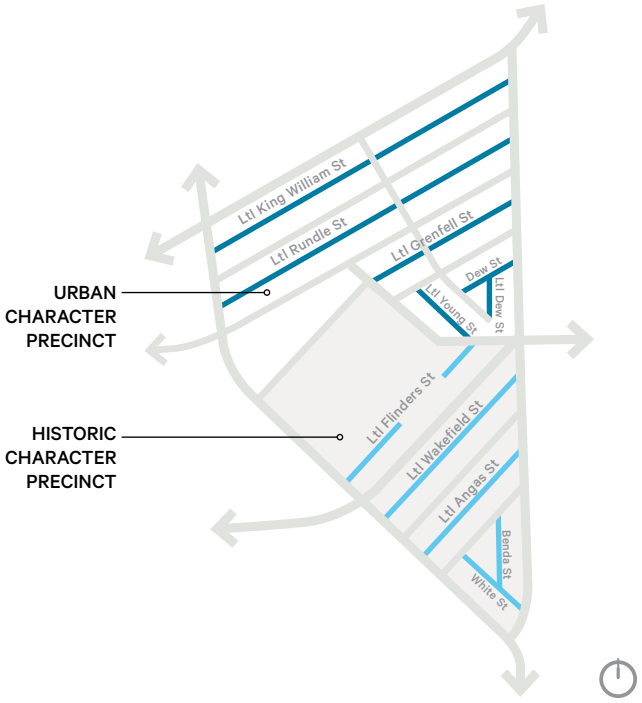
Main Roads

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

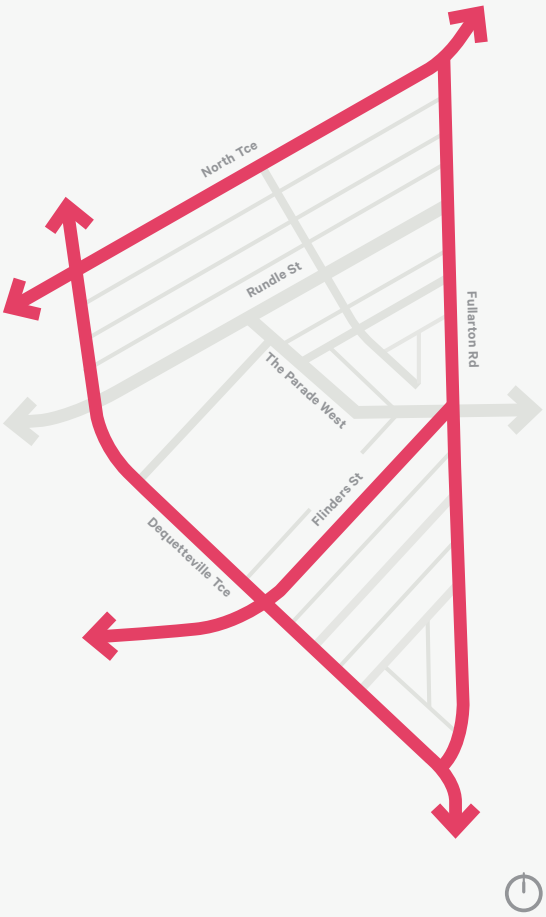
Perimeter main roads surround Kent Town and function as important vehicle corridors locally and within the wider metropolitan road network. Perimeter main roads:

— 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

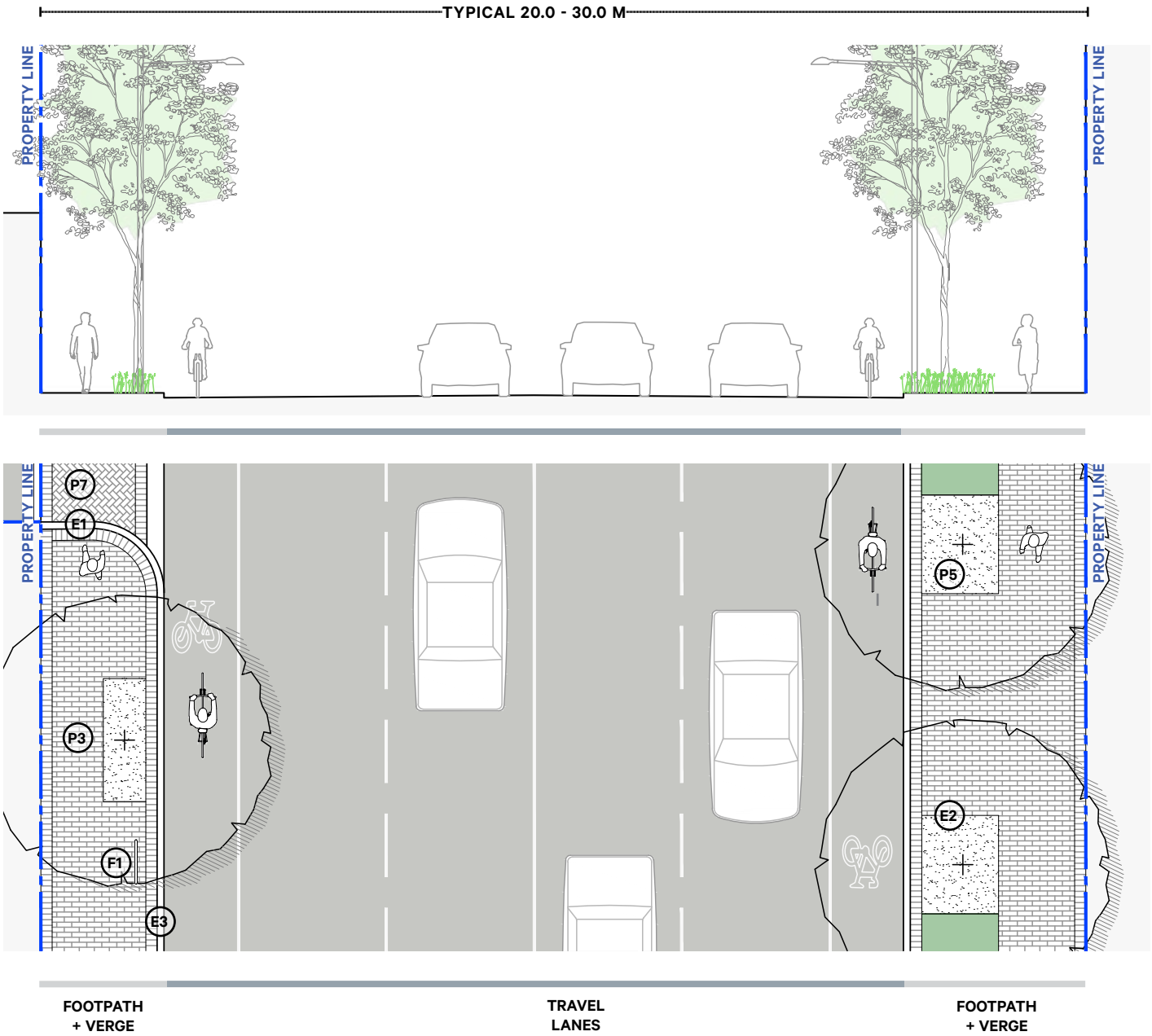
Perimeter main roads play an important role in the metropolitan road network and contribute to local character and sense of place. Perimeter roads provide places for activity and increased density of development. Perimeter main roads:

— 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

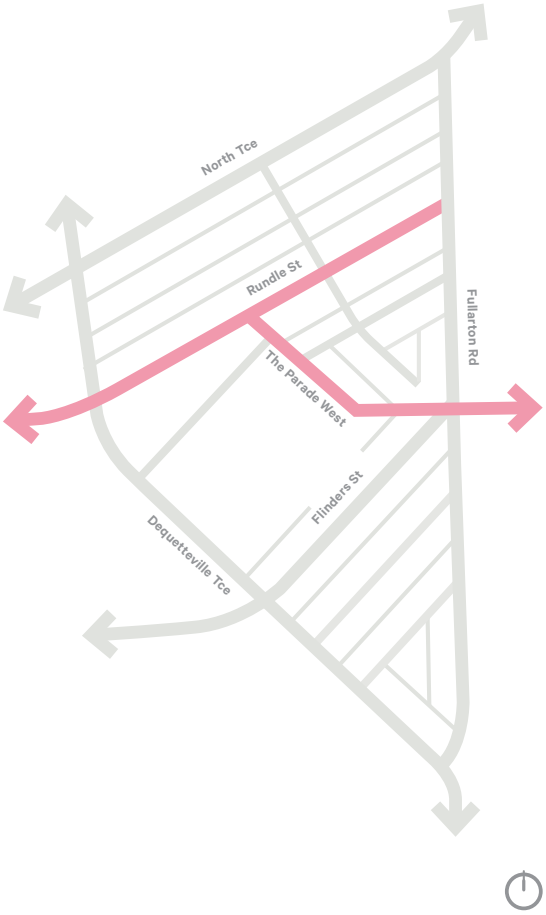
Internal main roads through Kent Town provide important routes for vehicles, public transport, bicycles and pedestrians. They cater for through traffic, and provide access to public transport, shops, schools and private property. Lower vehicle speeds allow for a more comfortable pedestrian and cycling 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

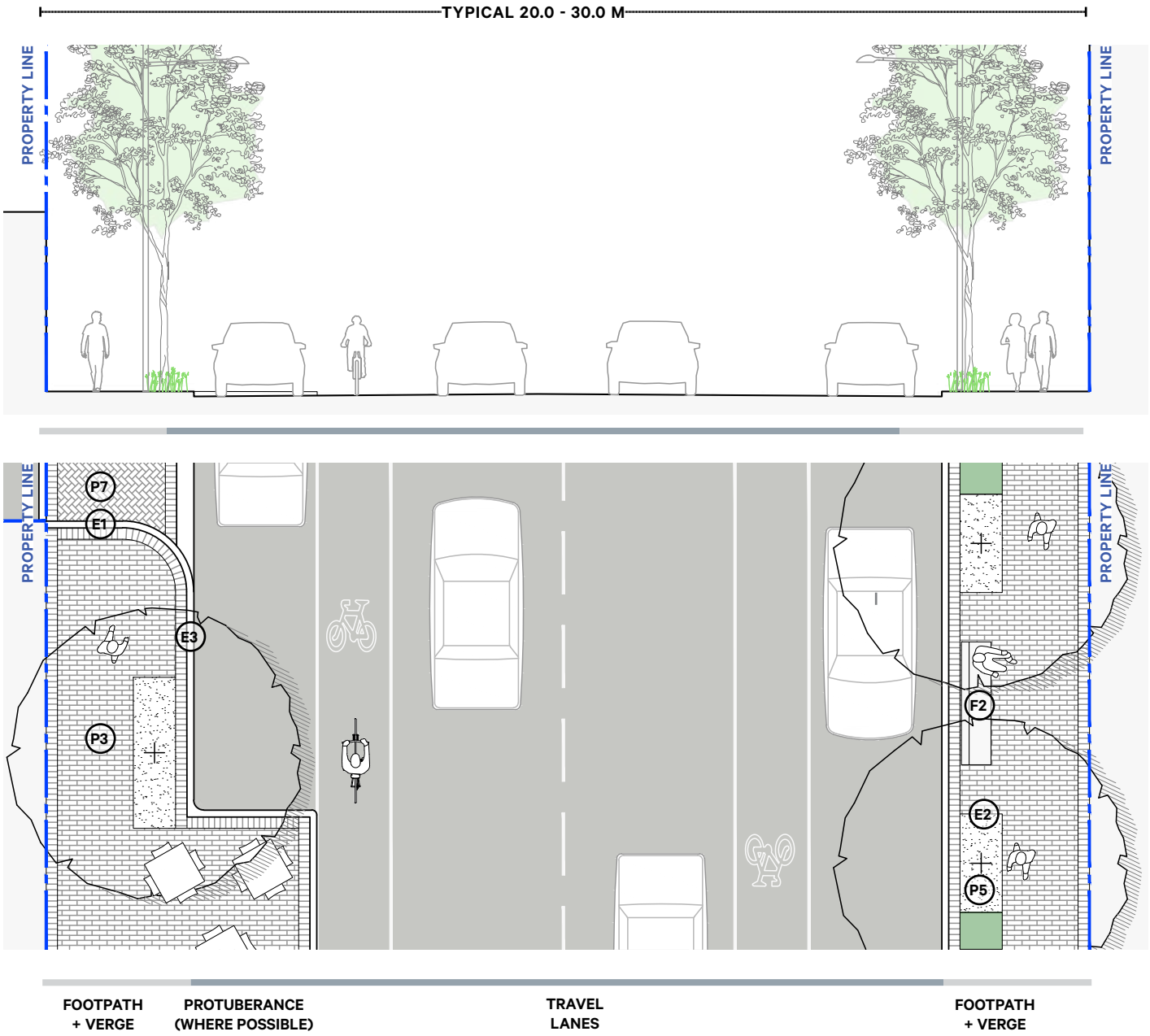
Internal roads play an important role in providing places for activity and increased density of development. Well designed internal main roads support an active and comfortable public realm and contribute to urban uplift. Internal main roads:

— 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

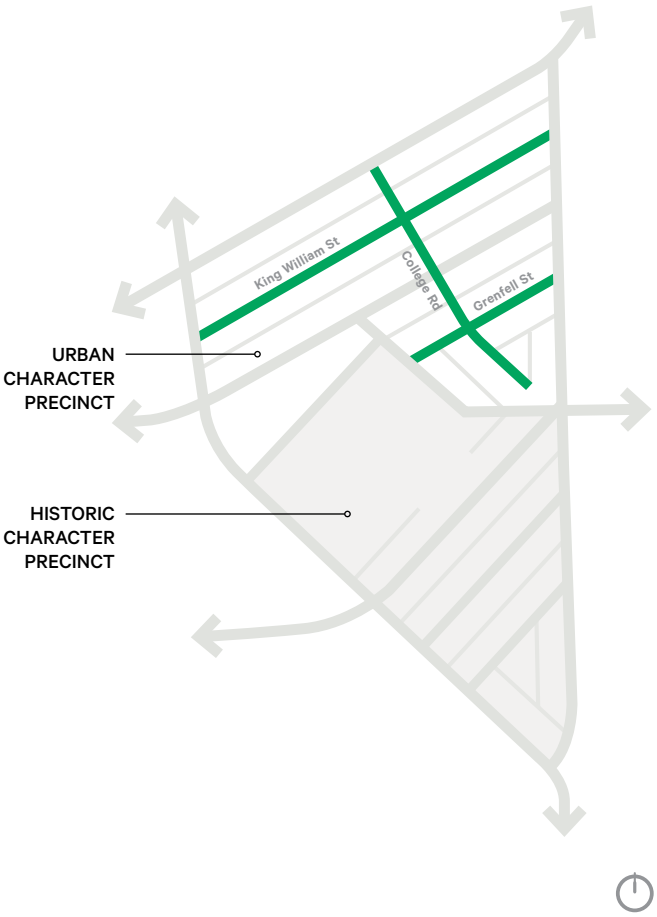
Streets within the Urban Character Precinct provide access to residential, commercial, industrial, retail and institutional allotments. Urban character streets are characterised by:

— Low traffic speeds and volumes.
— Safe and accessible pedestrian and cycling connections.
— On-street parking.

OPPORTUNITIES

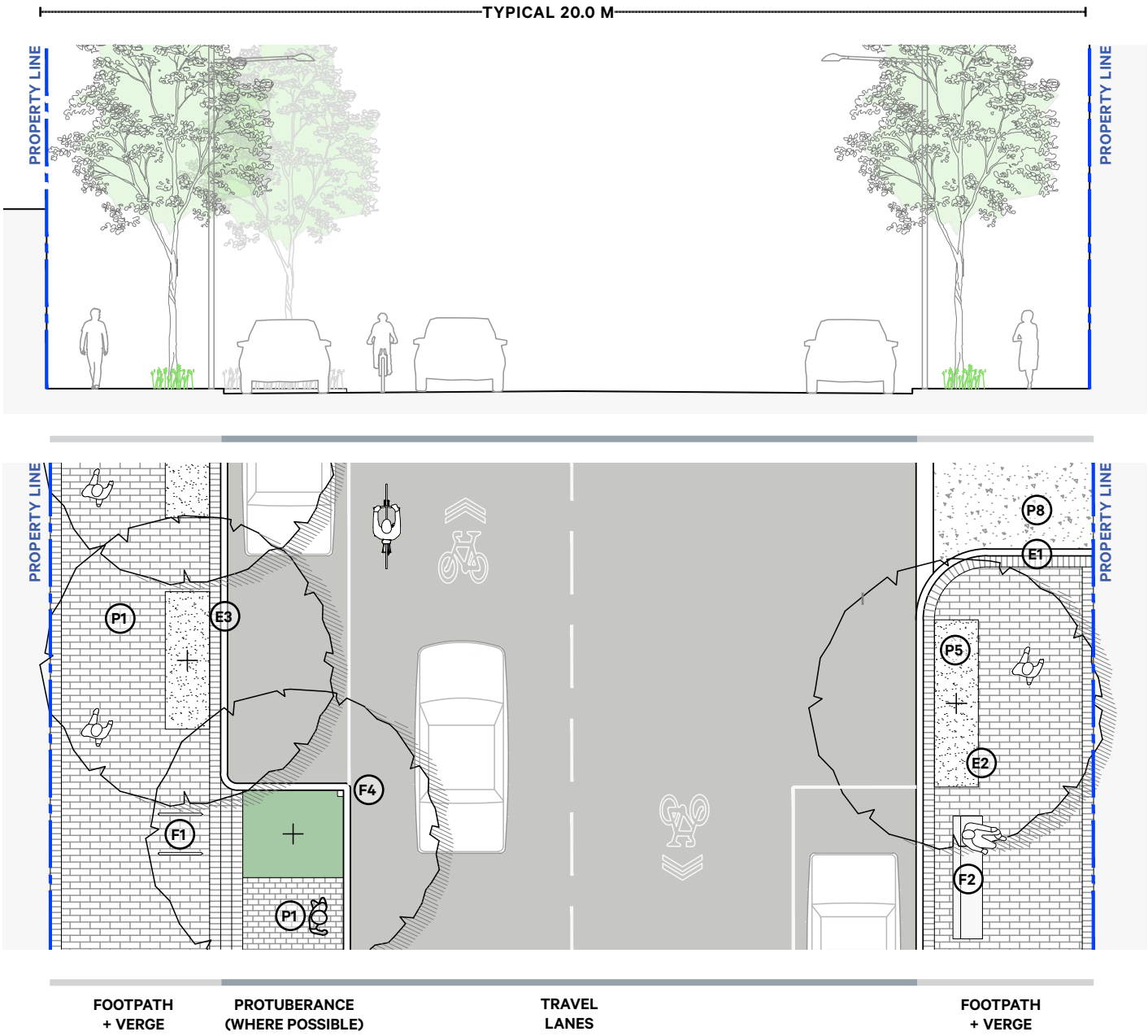
Streets within the Urban Character Precinct:

— 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

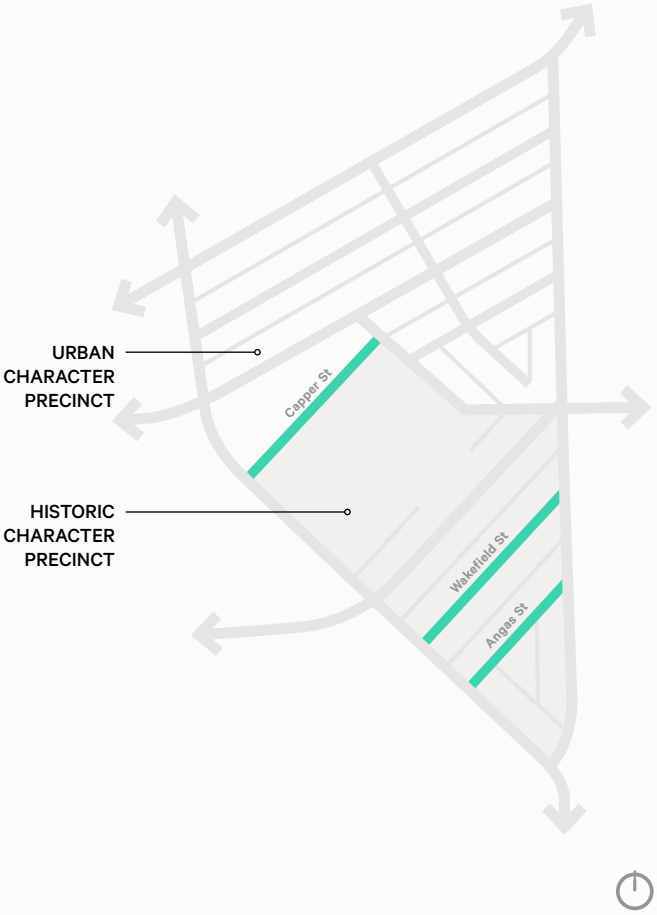
Streets within the Historic Character Precinct primarily service residential allotments and support vehicle, pedestrian and cycle movement through Kent Town. Historic character streets are characterised by:

— Low traffic speeds and volumes.
— Safe and accessible pedestrian and cycling connections.
— On-street parking.

OPPORTUNITIES

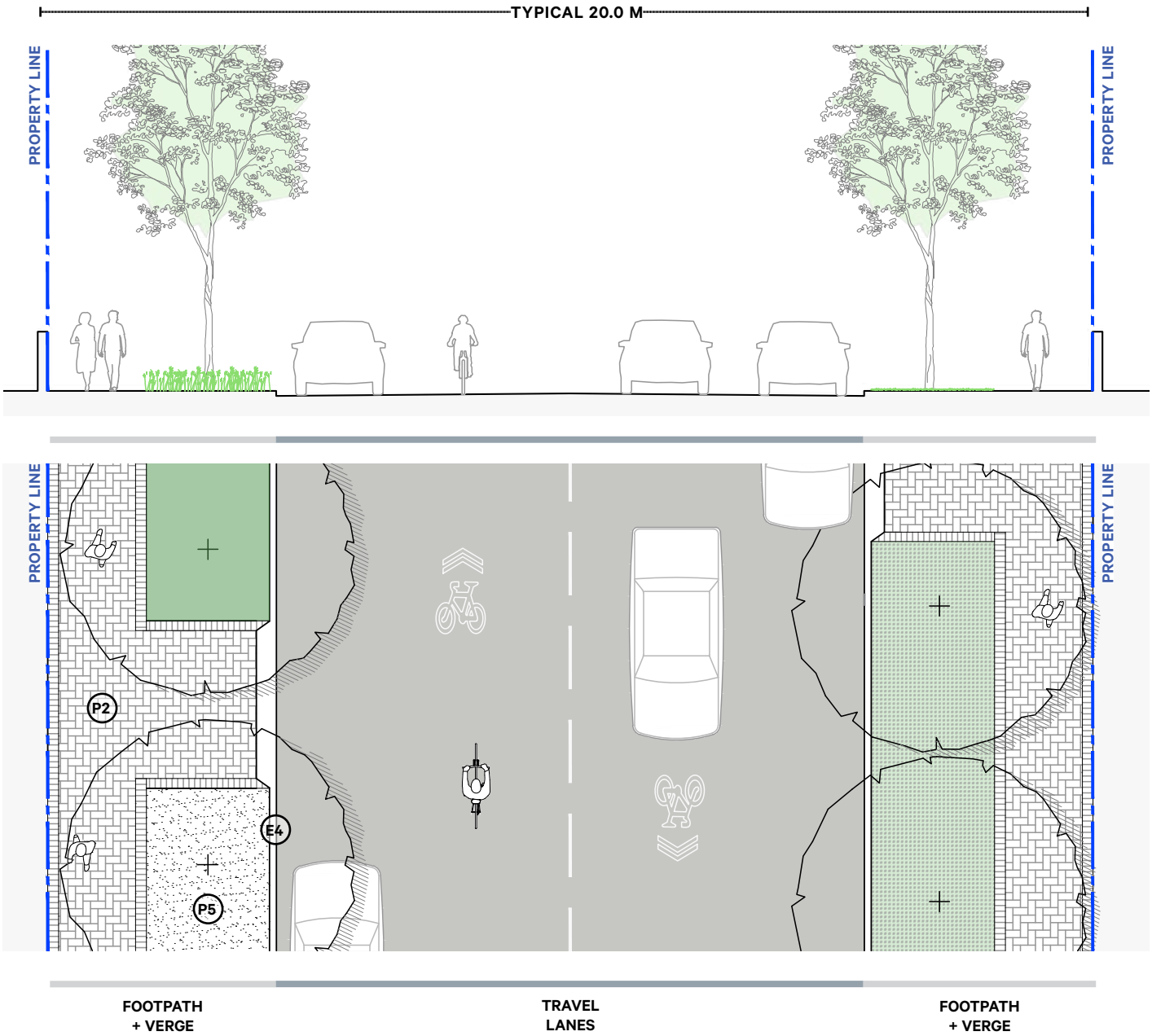
Streets within the Historic Character Precinct:

— 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

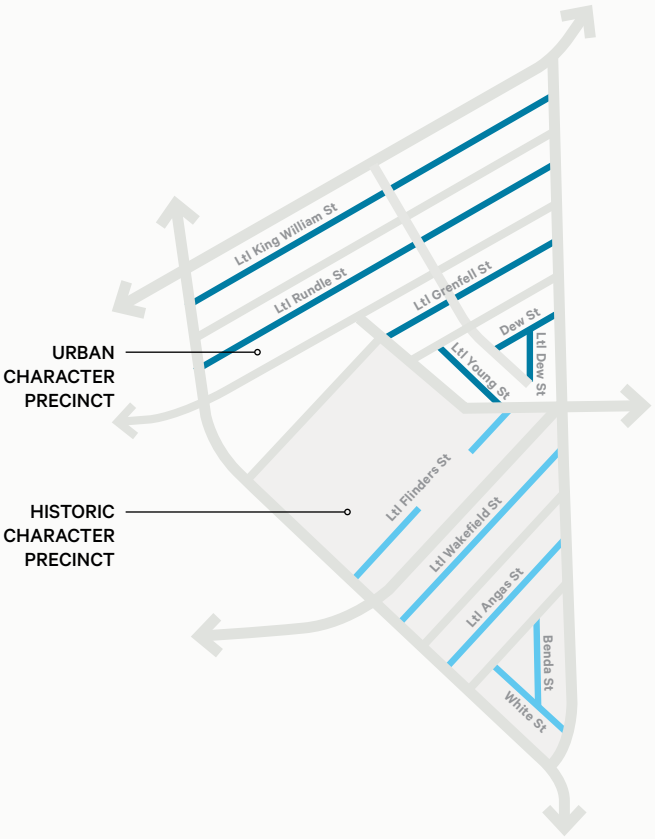
Laneways are relatively free of traffic and provide access to residential and commercial allotments. They improve pedestrian permeability through the precinct. Laneways are characterised by:

— Slow traffic speed.
— Low traffic volumes.
— Lower service standards (e.g number of footpaths or furniture).

OPPORTUNITIES

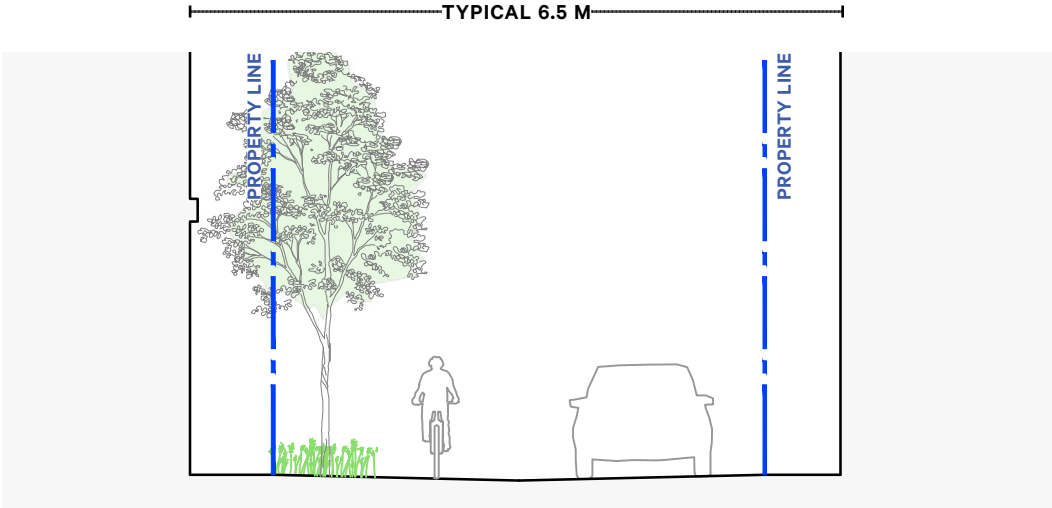
Laneways are the 'fine grain' within the street network. Laneways:

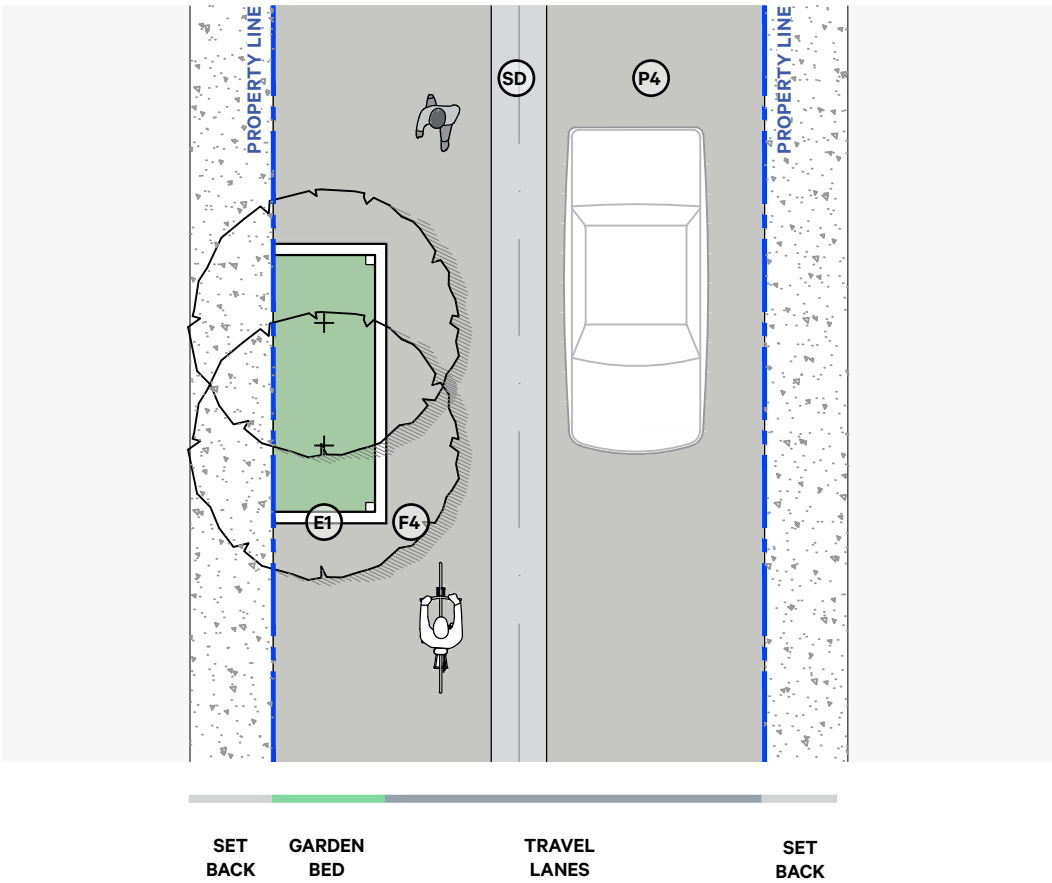
— Support walking and cycling movement.
— Support vehicle access and servicing of allotments.
— Accommodate greening where possible, including tree plantings and vertical greening of fences/walls.
— Incorporate public art and signage to reflect and enrich the character of the area.
— May incorporate lighting to suit higher use routes.



Existing laneway character, Little Rundle Street

EXAMPLE LANEWAY LAYOUT - LITTLE RUNDLE STREET





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

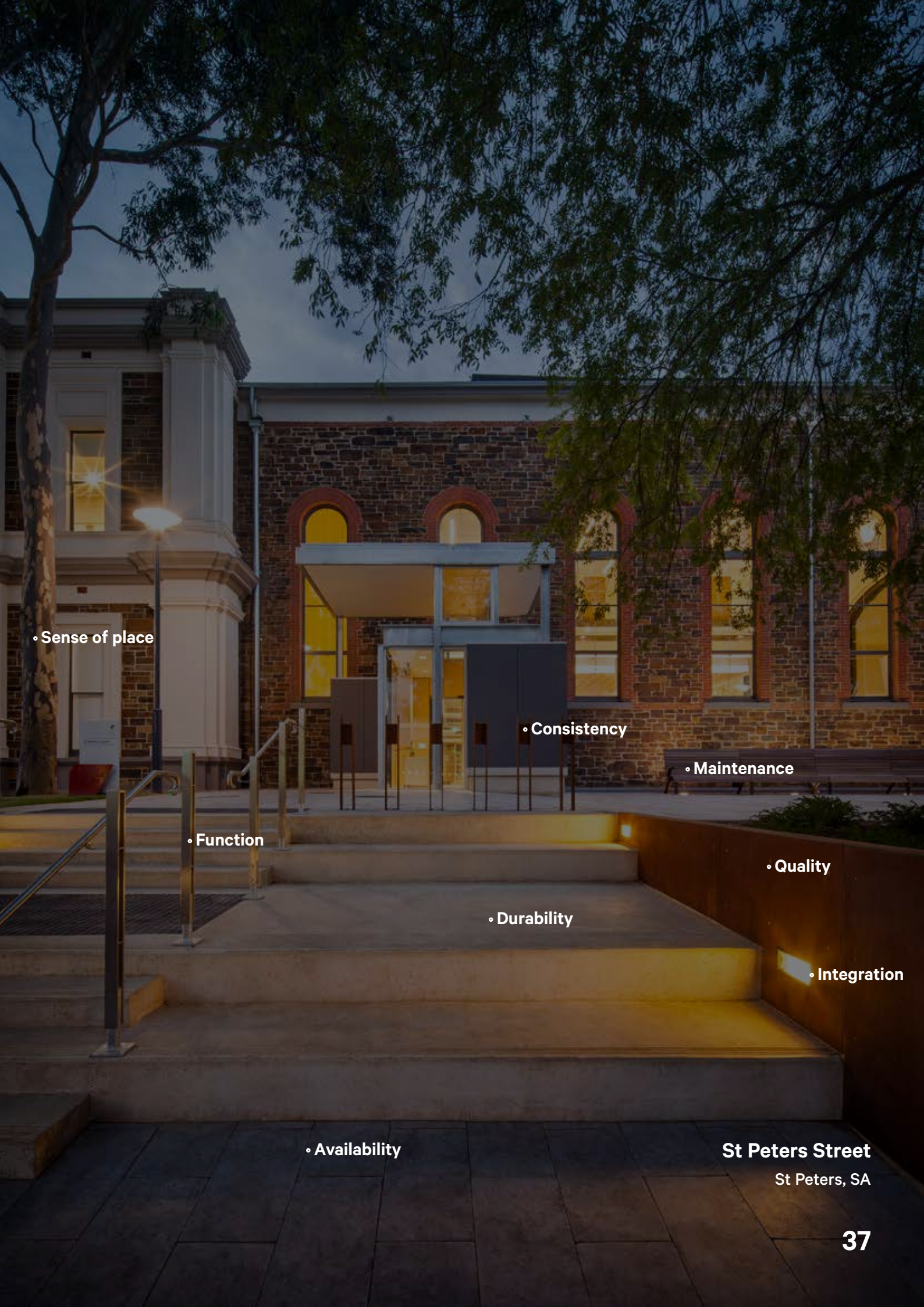
Elements are robust and long lasting. Whole-of-life costs are considered.

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

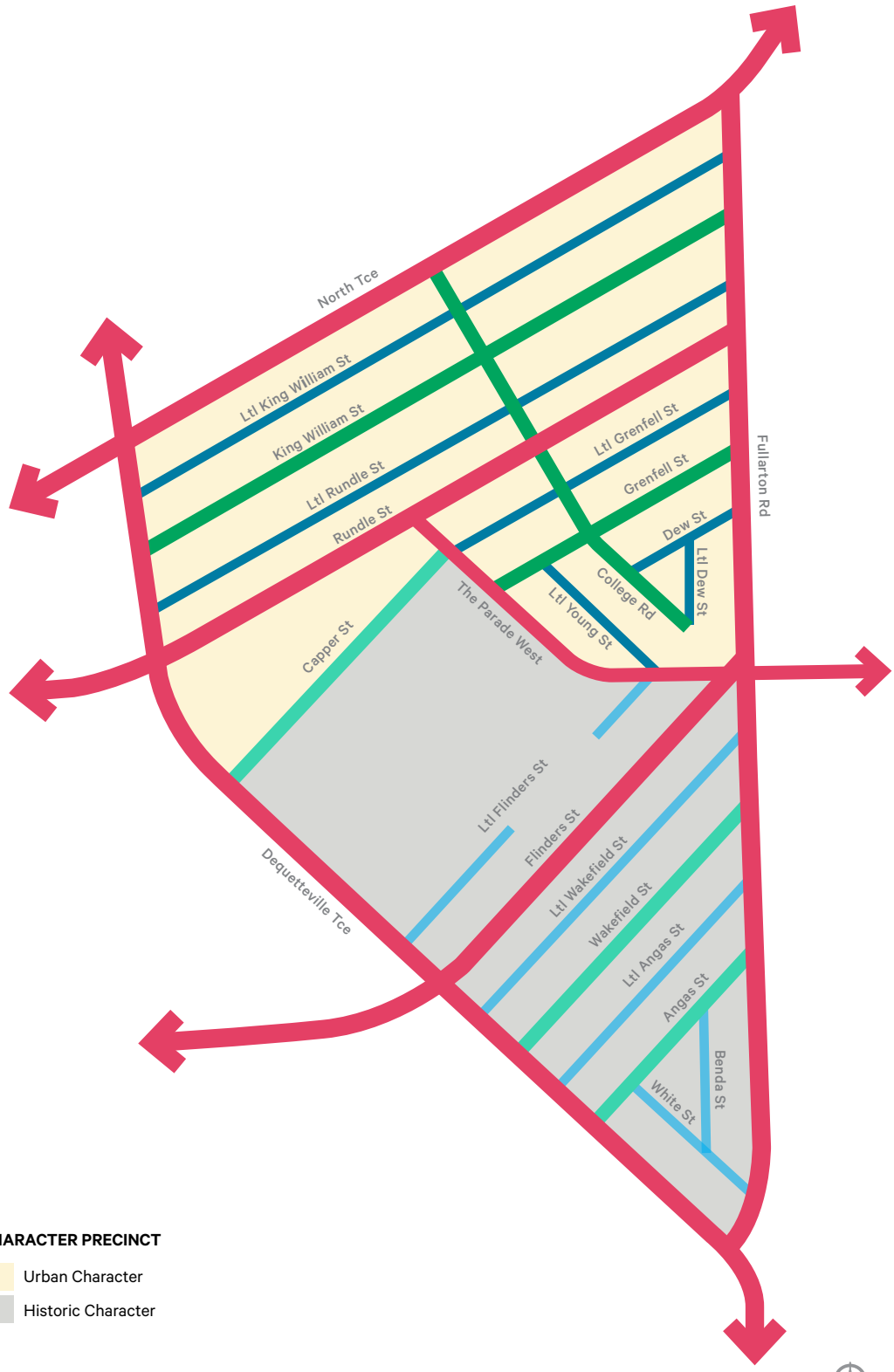
A
Public art

— 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

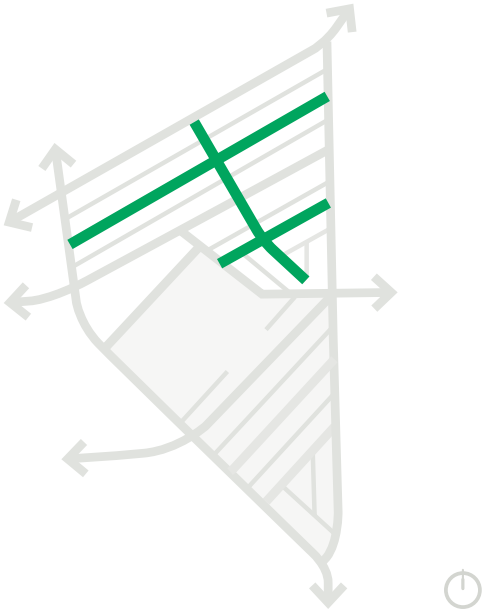
E3 - Concrete Kerb & Watertable

E4 - Stone Kerb & Watertable

Verde Apartments Streetscape

Kent Town, SA

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

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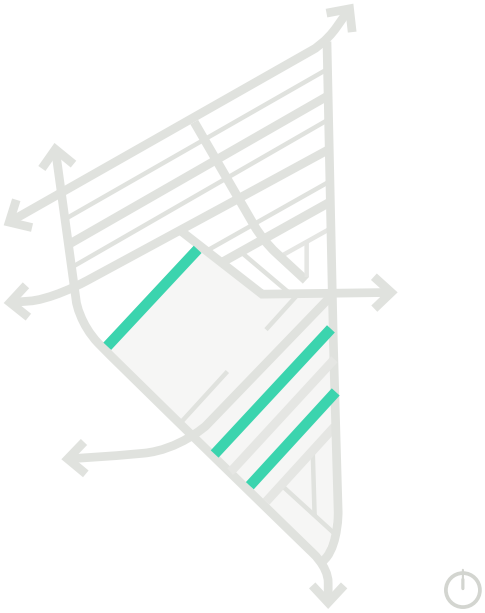
P2

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.

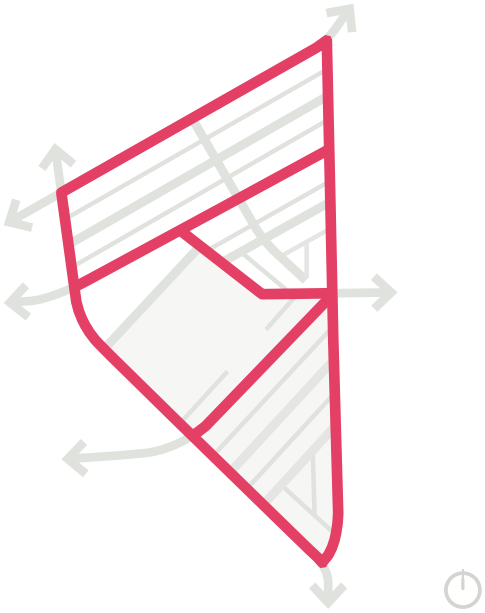
Example pavers (herringbone pattern)

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)

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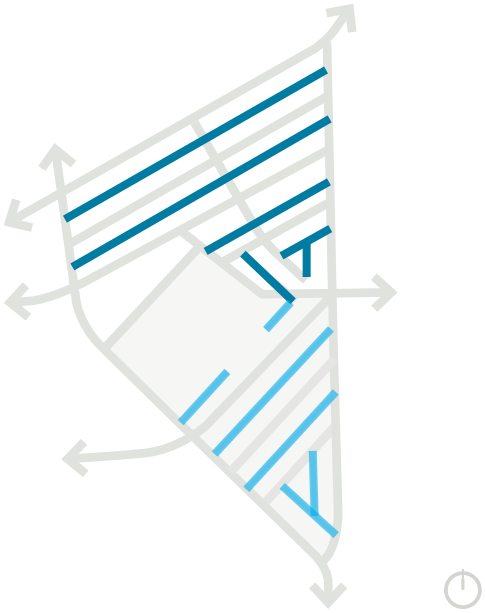
& St Peters

P4

Asphaltic Concrete

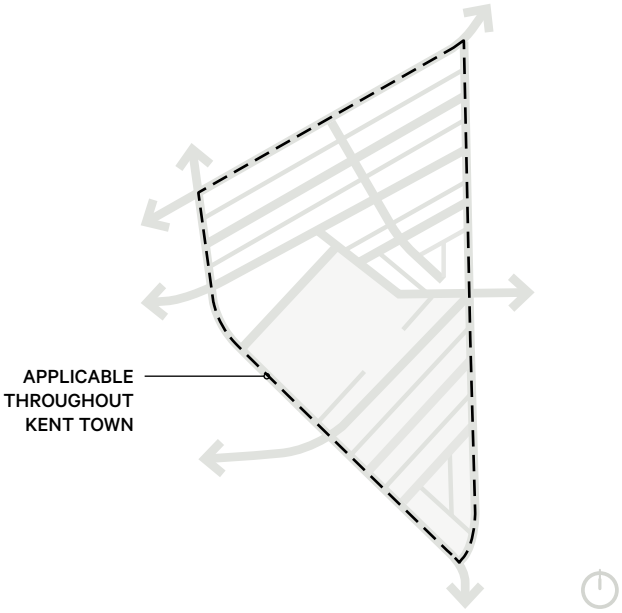
DESCRIPTION	Asphaltic concrete.
MATERIAL & COLOUR	Standard asphaltic concrete black.
FINISH	Rolled smooth.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— AC7 - Primary-use by pedestrian and cycles. — AC10 - Primary-use by vehicles. — Restrained edges all sides.
MAINTENANCE	— Patch any cracks, general cleaning.
USES	— Laneways - road paving.



Typical asphalt finish

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

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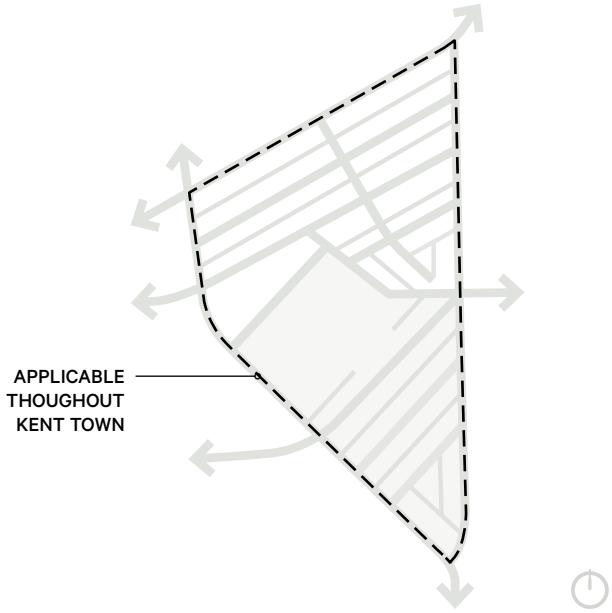
Tactiles

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

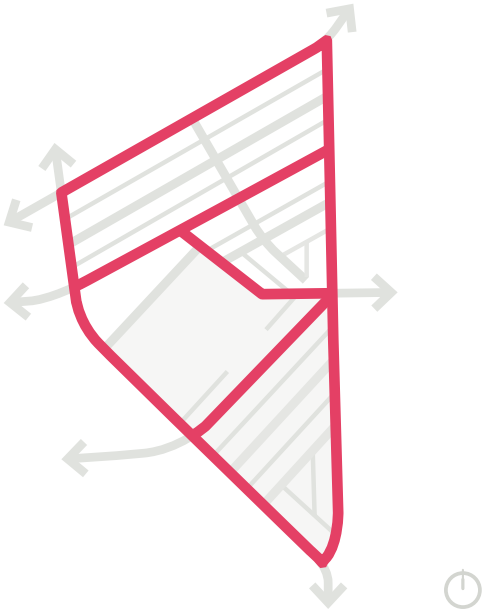
Directional tactile

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)

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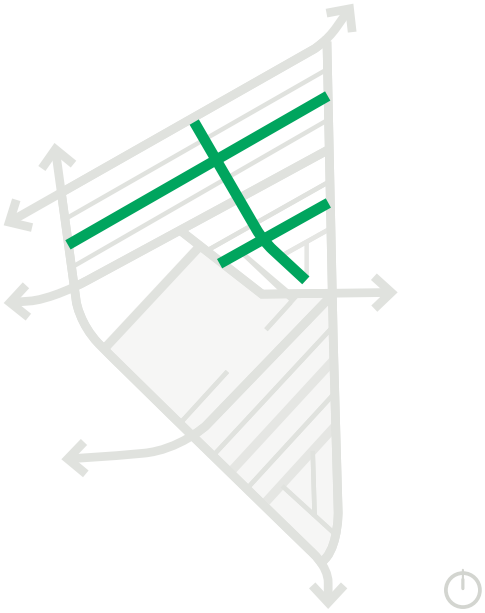
Concrete Crossover

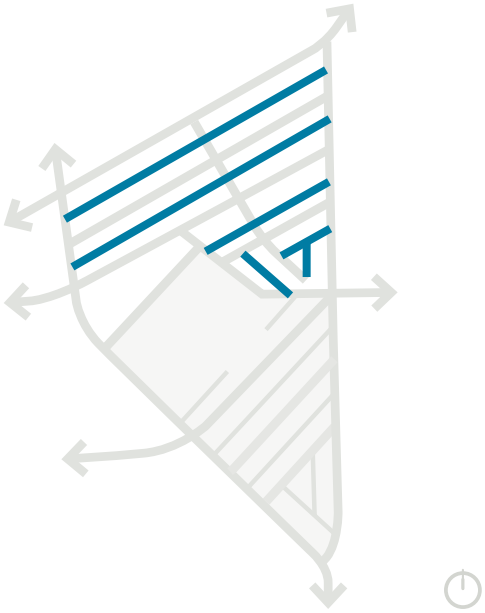


DESCRIPTION	Insitu reinforced concrete.
MATERIAL & FINISH	Inverts – smooth steel trowel. Crossover – washed 1mm reveal.
SUPPLIER	Hanson, Premix or equal.
PERFORMANCE REQUIREMENTS	— 120mm thick N32 concrete reinforced. — 100mm compacted sub-base. — No lip between invert and watertable unless specified. — 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)

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

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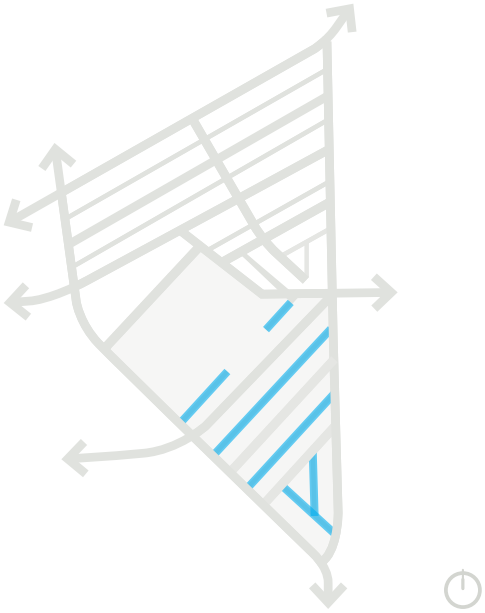
P10

Stone Paved Spoon Drains



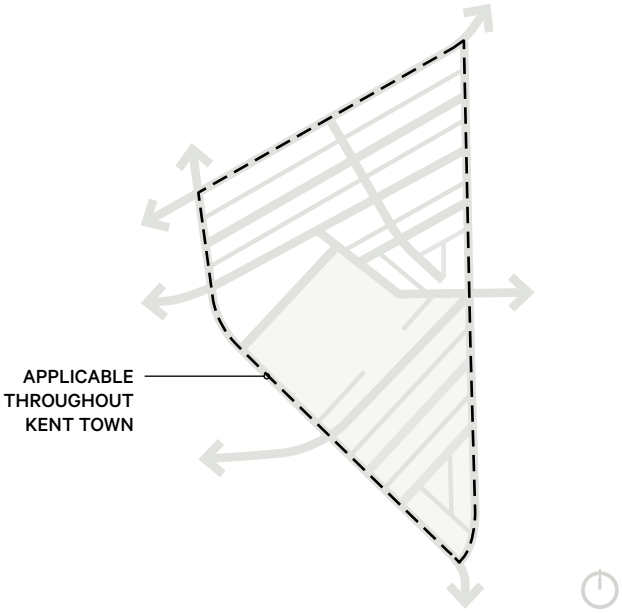
DESCRIPTION	Stone block paving spoon drainage.
COLOUR	Bluestone.
FINISH	Split face.
DIMENSION	450mm wide.
SUPPLIER	Various.
PERFORMANCE REQUIREMENTS	— Construction to engineers specification.
MAINTENANCE	— General cleaning. — Lift broken/chipped pavers and replace. — Cracks or chips in surface to be 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

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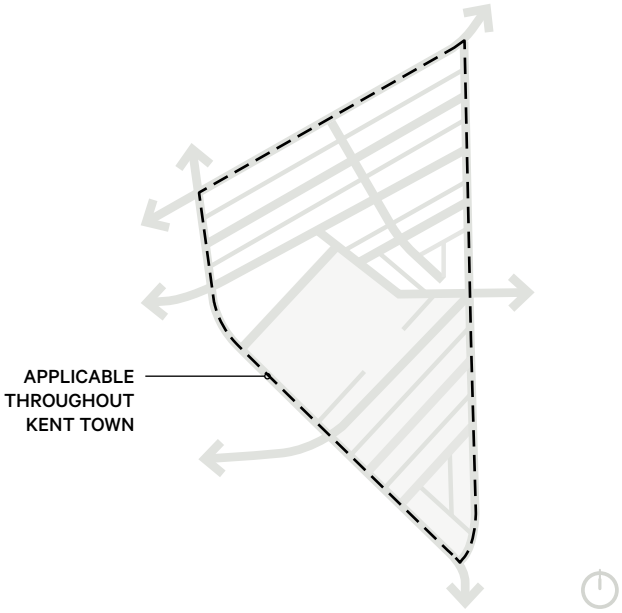
E2

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

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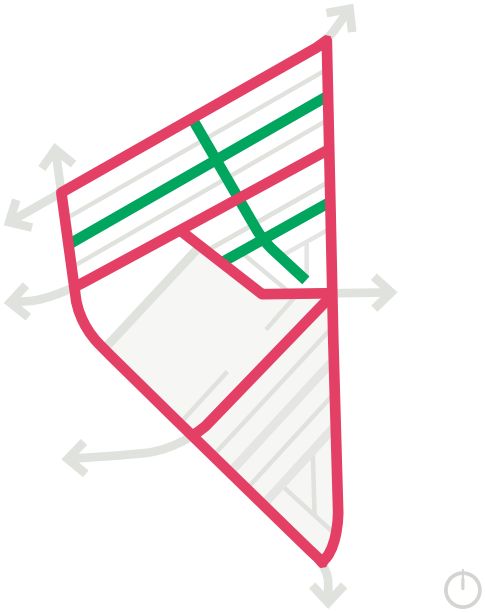
& St Peters

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

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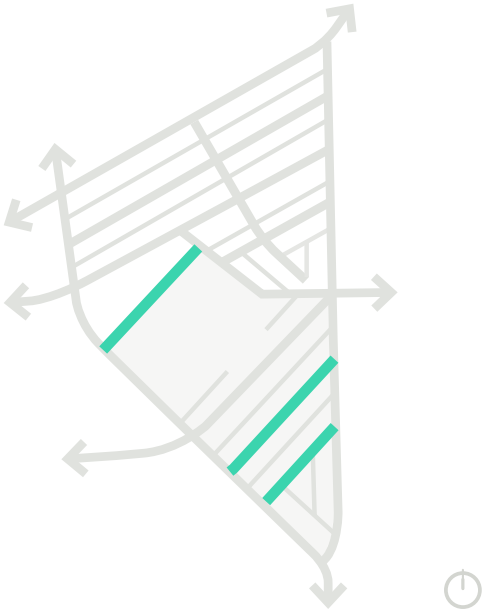
& St Peters

E4

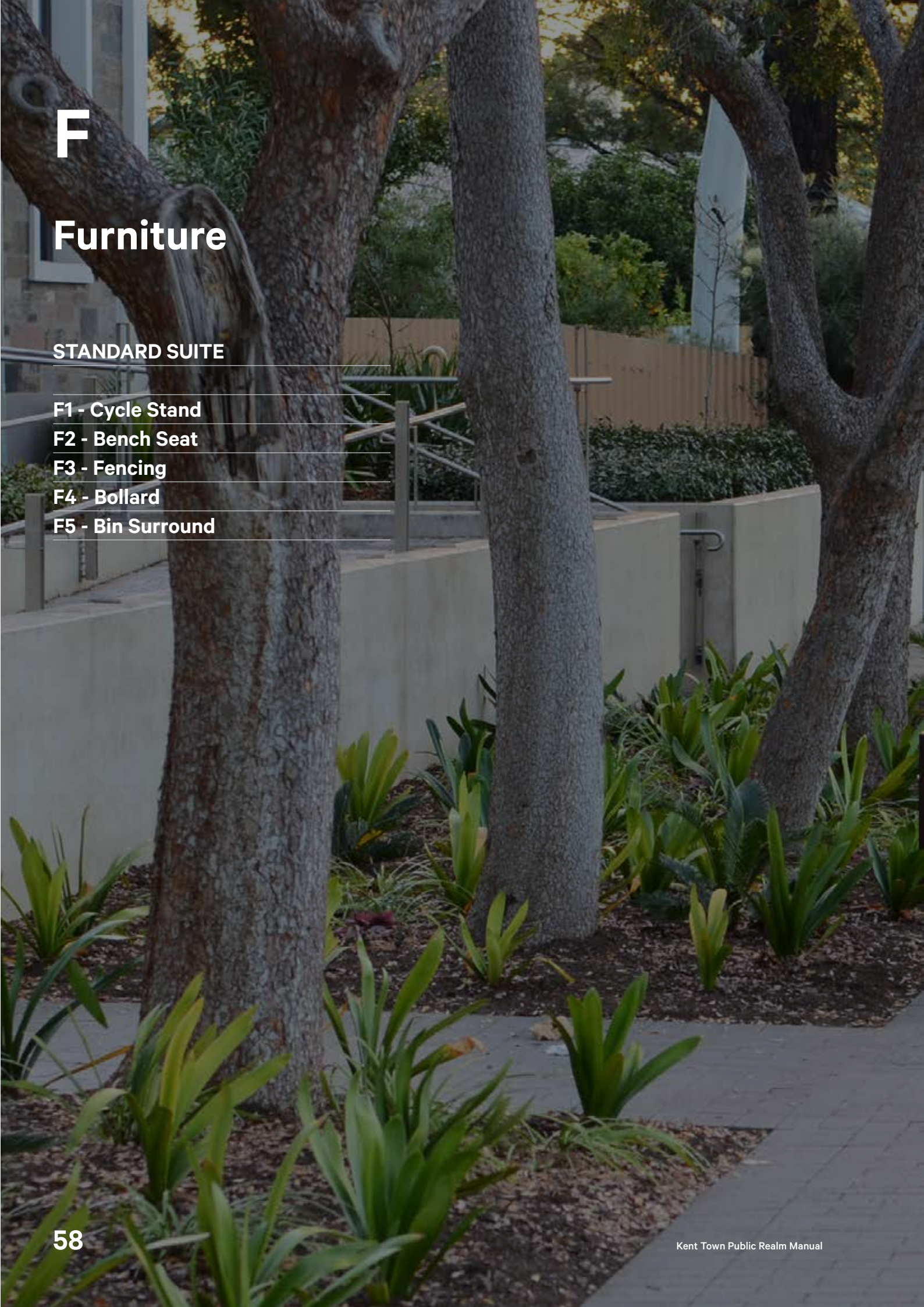
Stone Kerb & Watertable

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

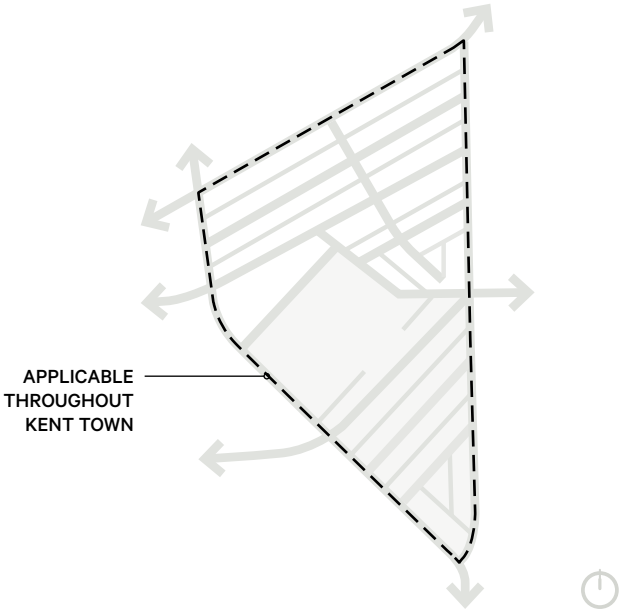
F5 - Bin Surround

St Peters Street

St Peters, SA

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

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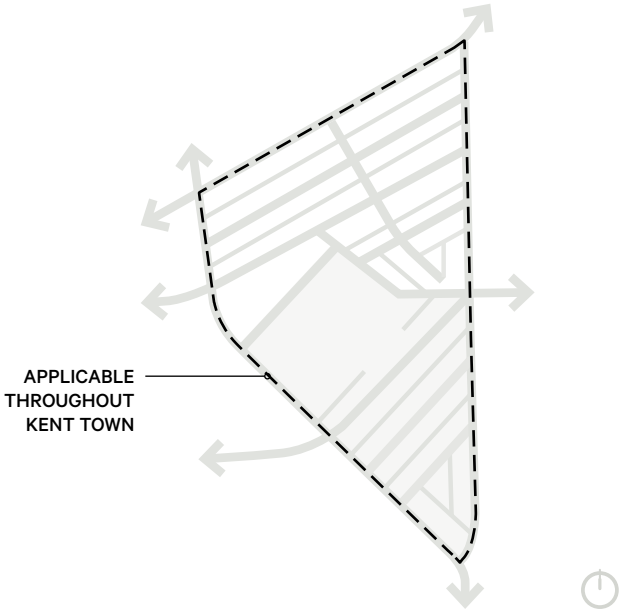
Payneham
& St Peters

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

City of
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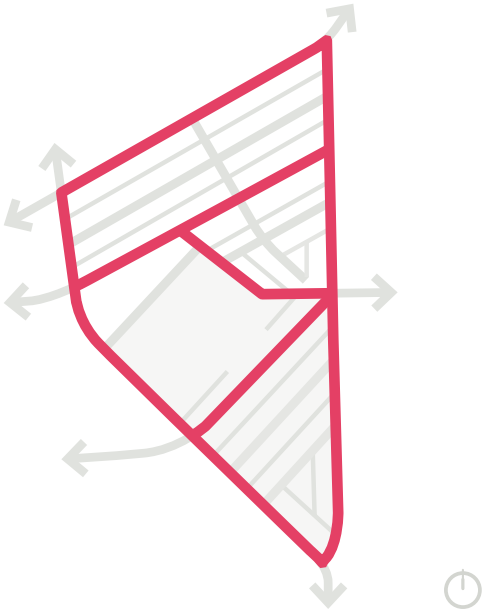
& St Peters

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

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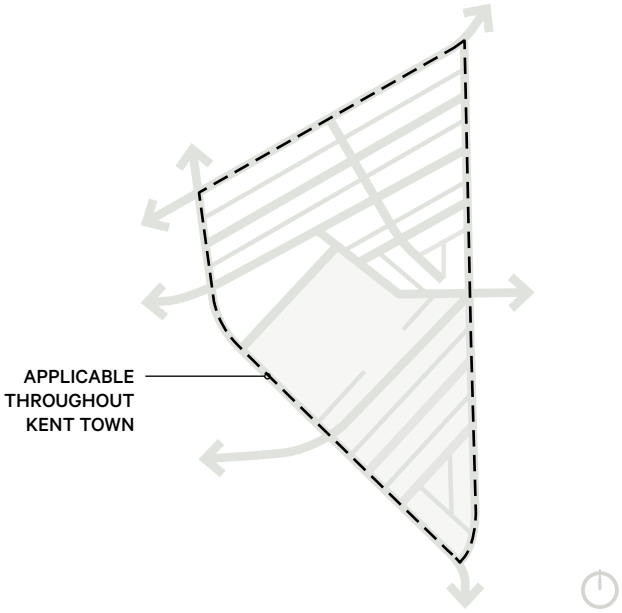
F4

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

City of
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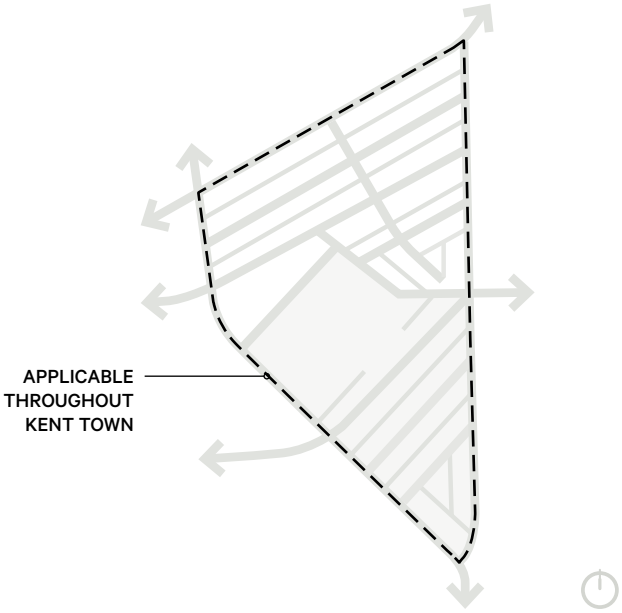
Payneham
& St Peters

F5

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

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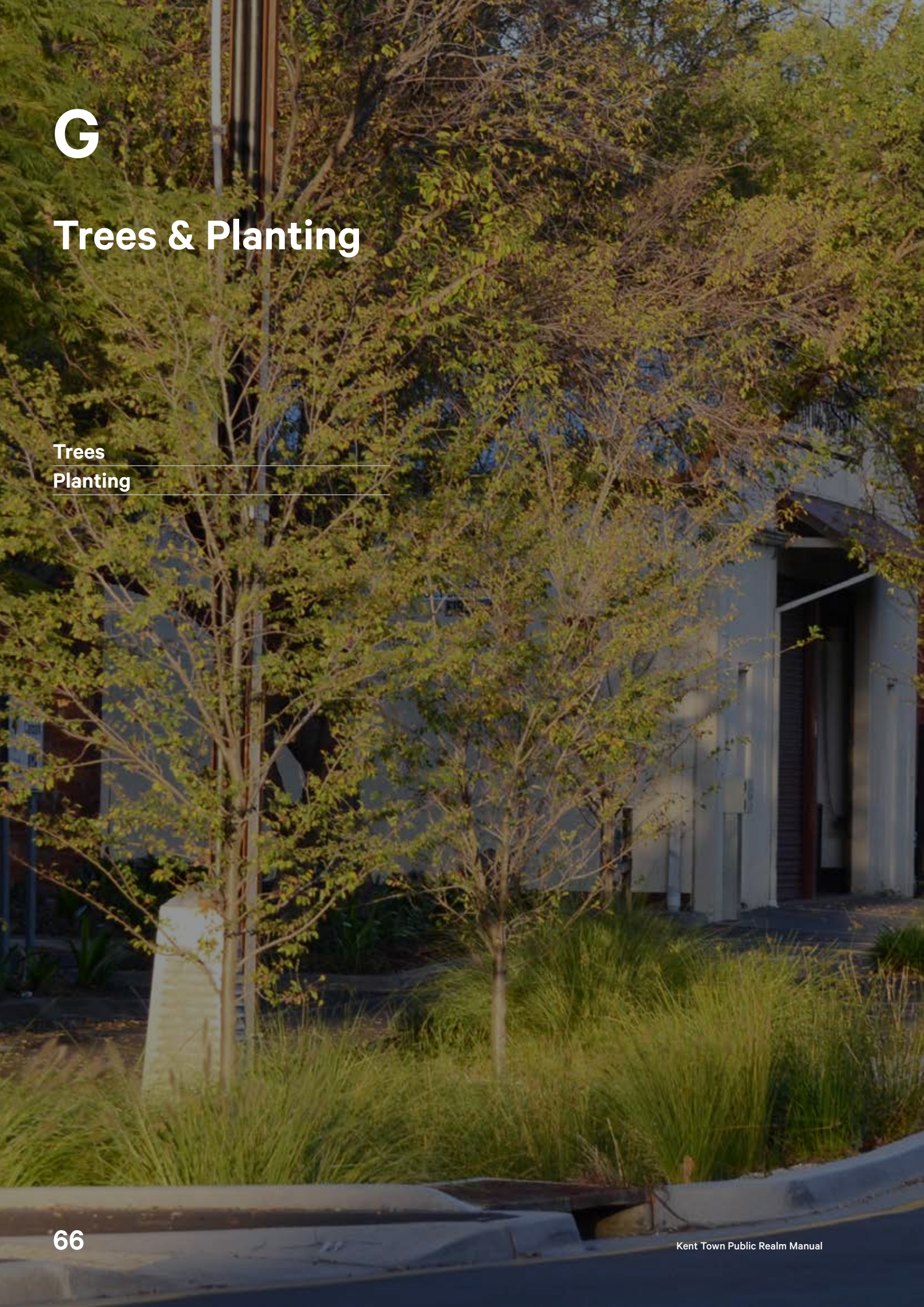


G

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.

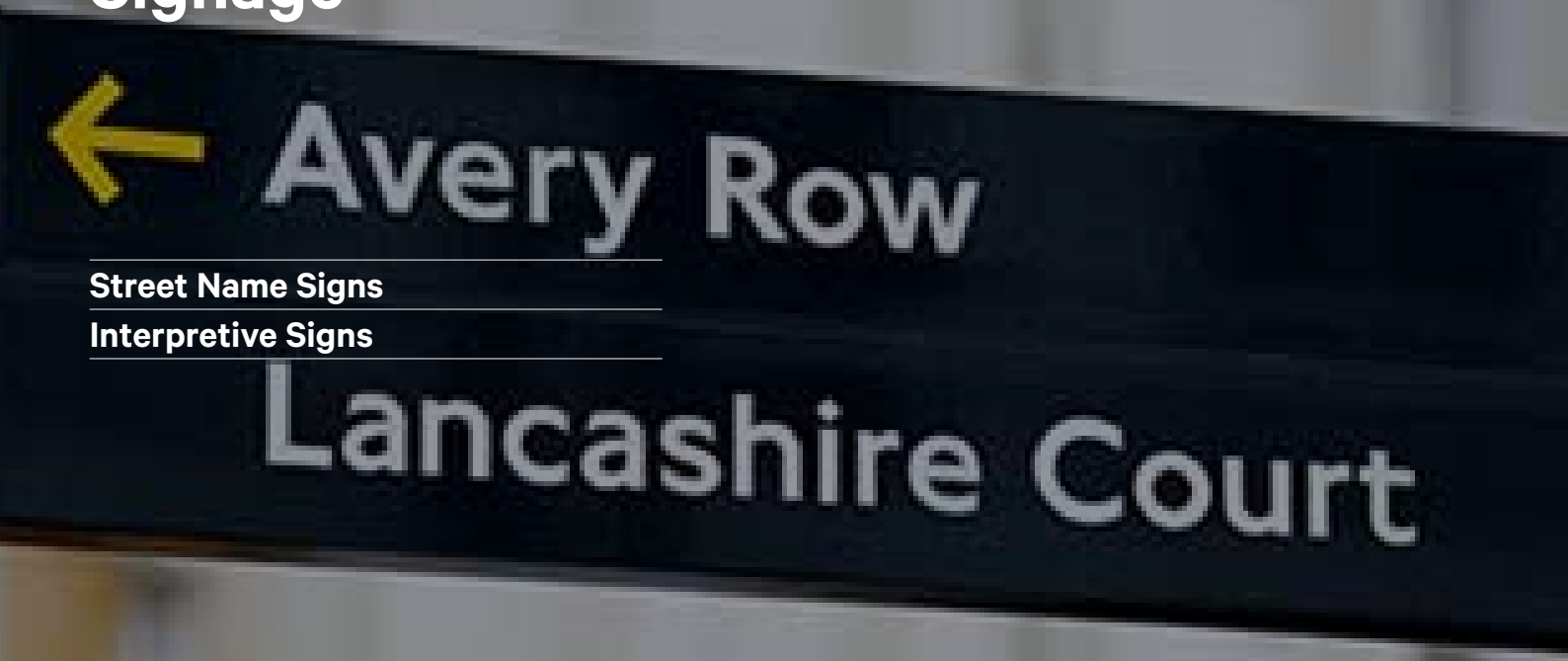
PLANT SELECTION TABLE

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.

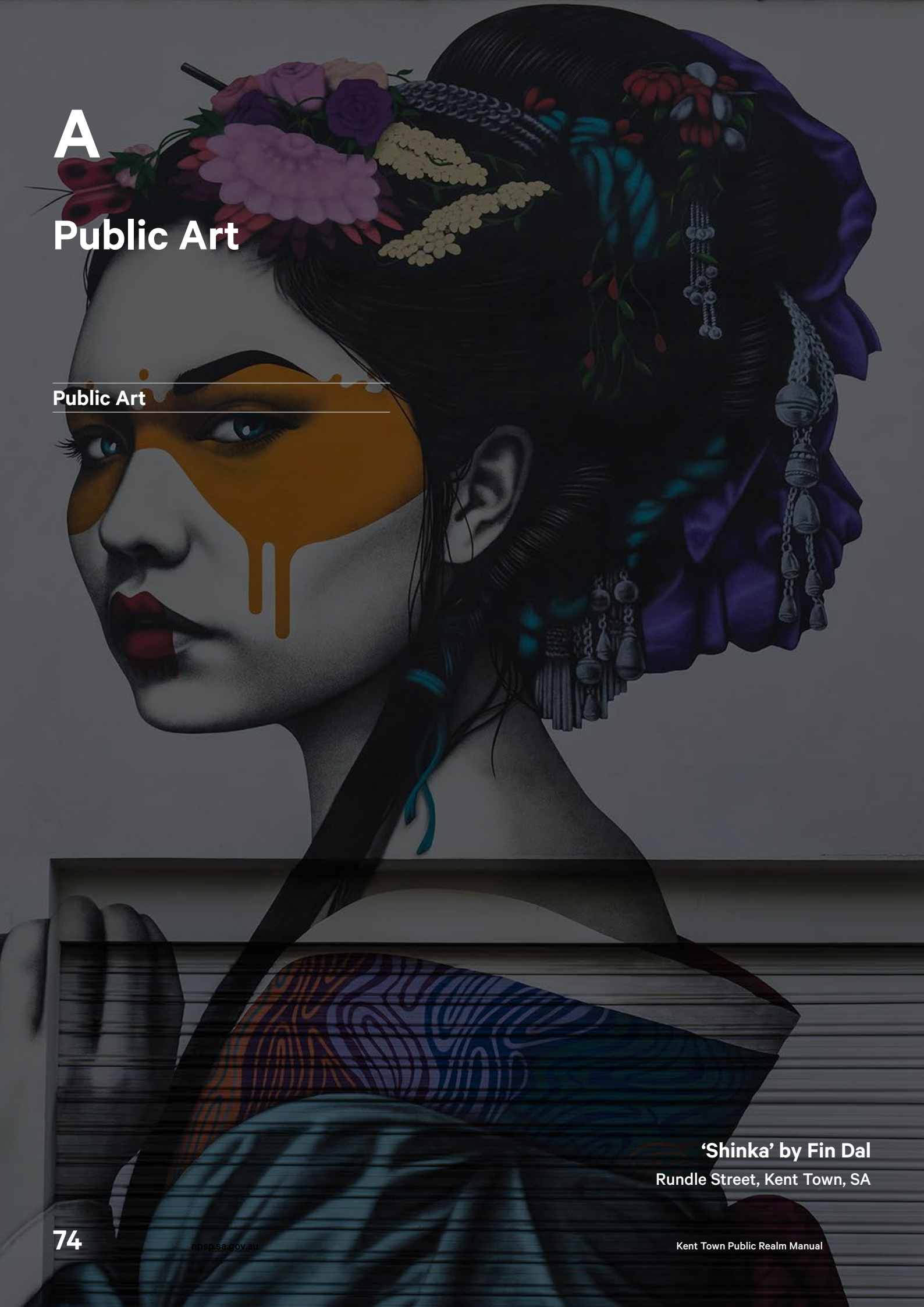
Example street name signage

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

oxigen

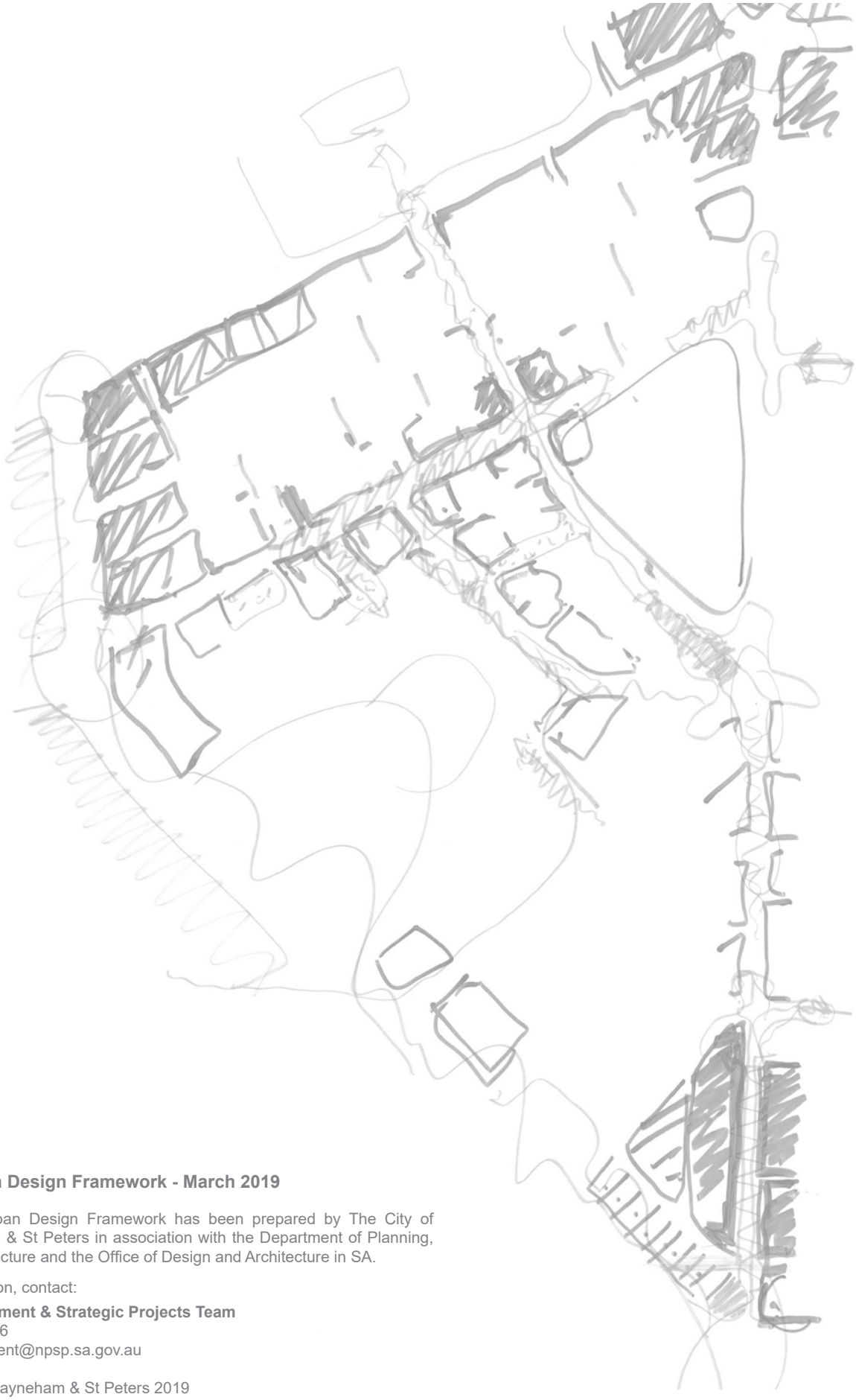
Oxigen Pty Ltd
98–100 Halifax Street
Adelaide SA 5000

T +61 (08) 7324 9600
design@oxigen.net.au
oxigen.net.au

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.

For further information, contact:

Economic Development & Strategic Projects Team
Telephone 8366 4506
EconomicDevelopment@npsp.sa.gov.au

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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

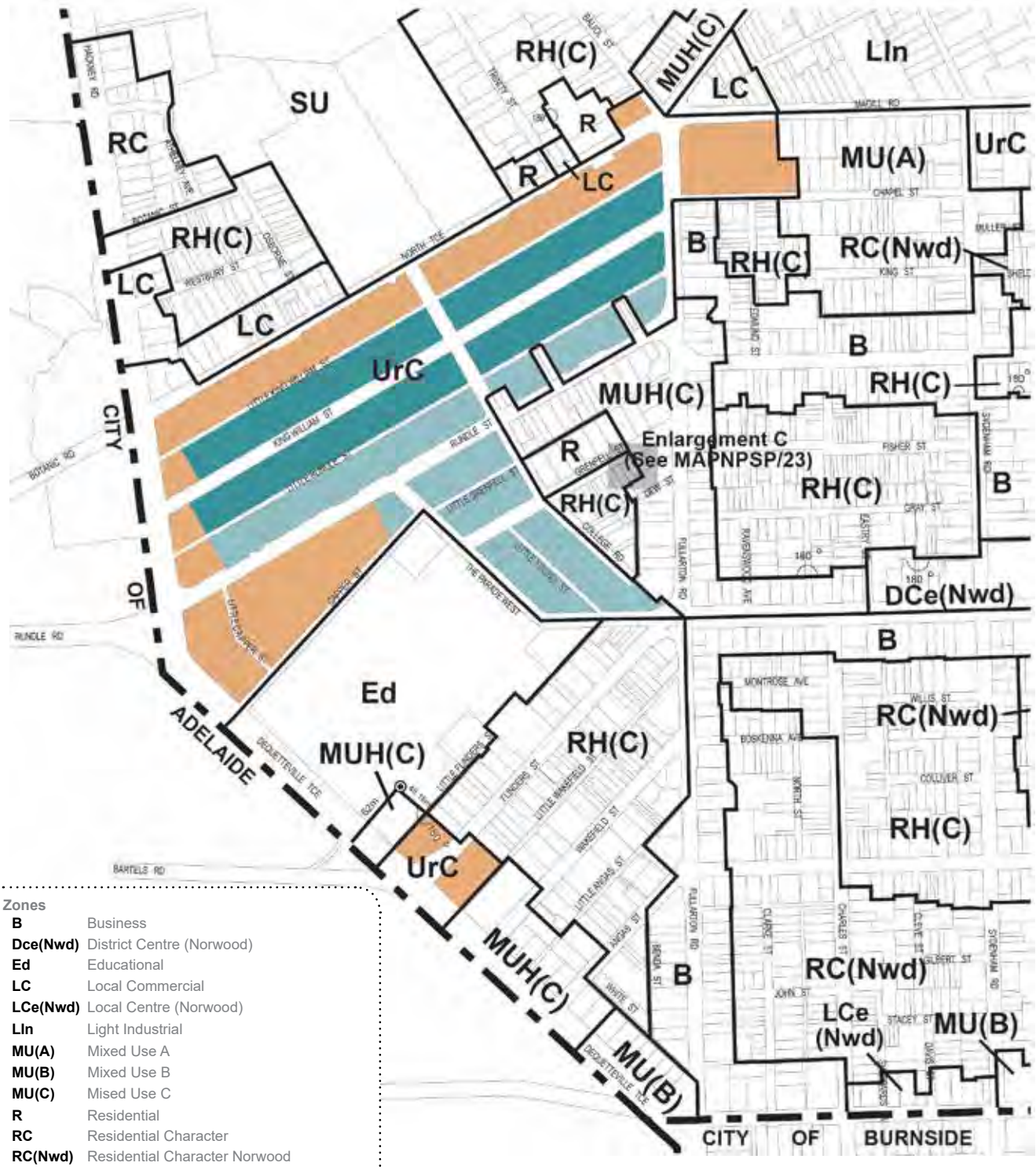
The vision, themes and overall strategic directions for Kent Town provides a aspirational framework for decision makers to make a more informed judgment on the merits of new development and its positive contribution to the long term evolution of Kent Town.

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.

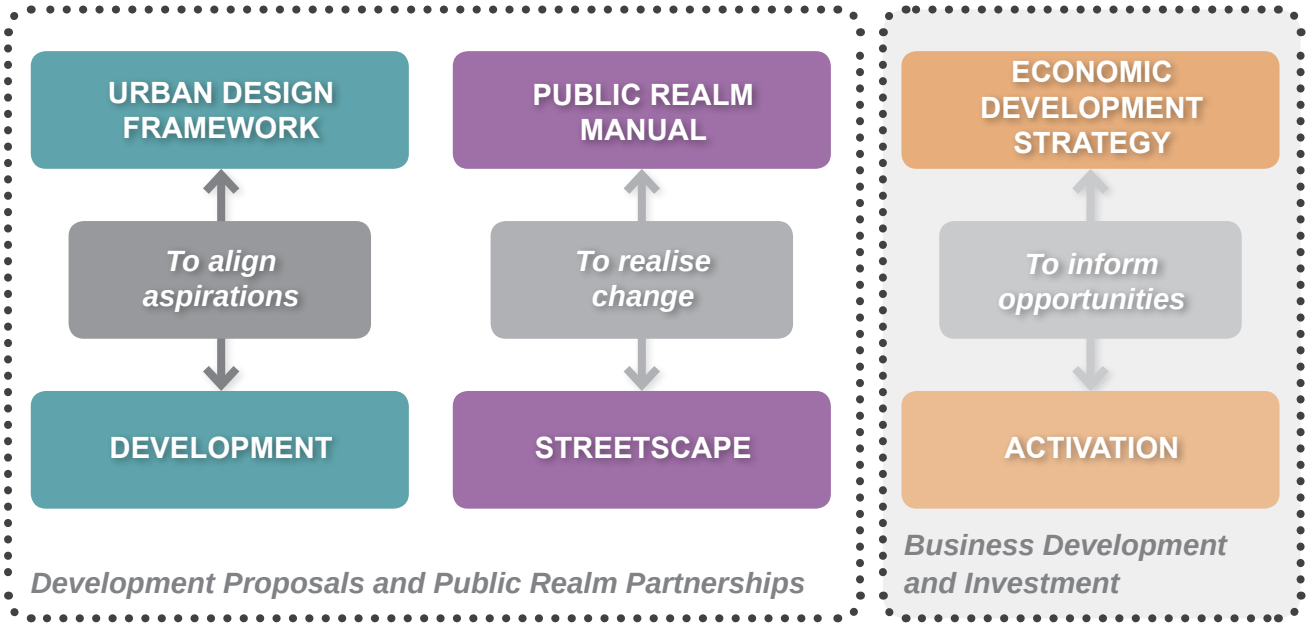
Kent Town Public Realm Manual

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

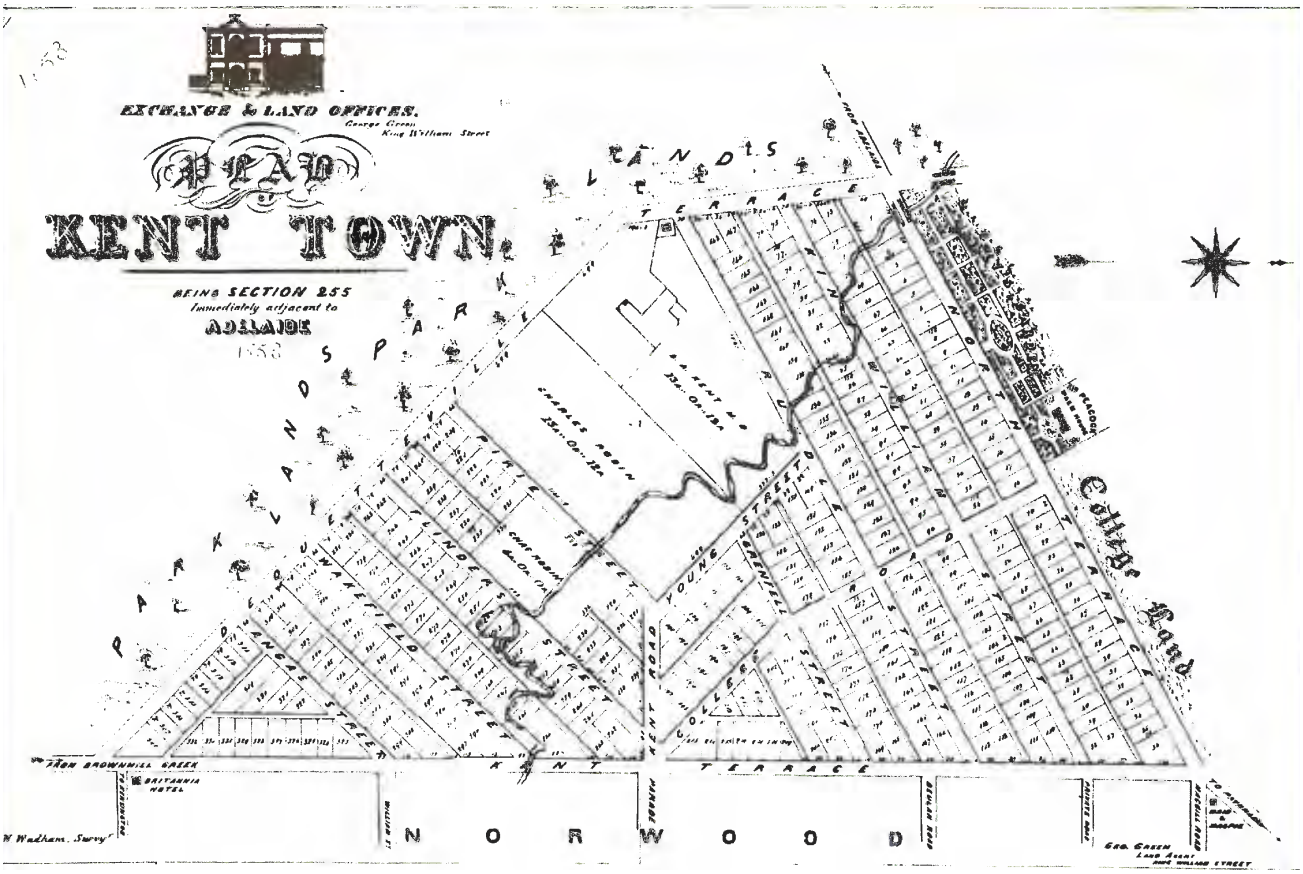
- There is a lack of established community focused places and spaces to gather within the neighbourhood.
- The *Little Rundle Arts Project* engaged the local community and fostered a new sense of place for the laneway.
- The organic and ad-hoc evolution of the ‘little’ streets have established a varying 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.

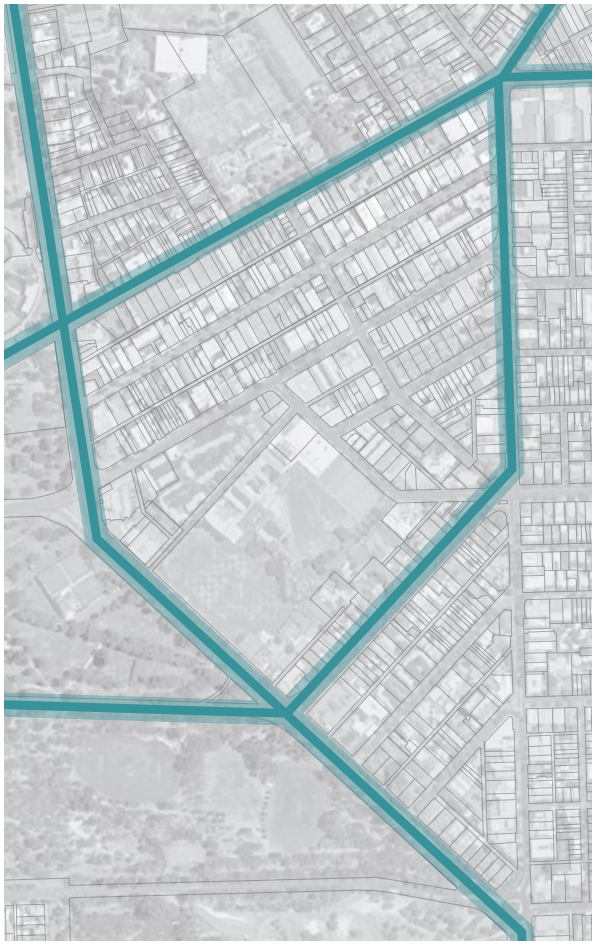
The evolution of Kent Town will be shaped by incremental changes to the public realm and driven by local developments.

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.



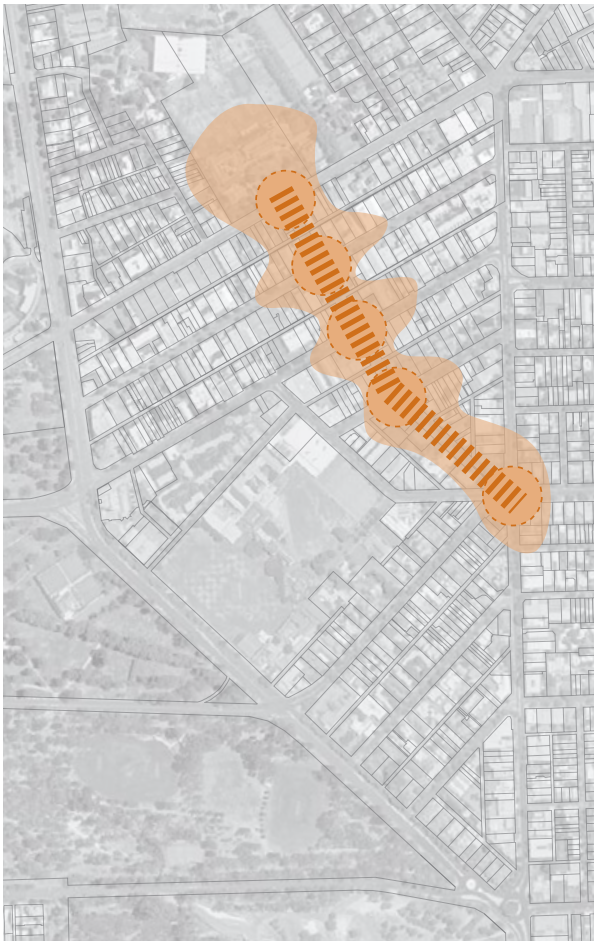
The 'Borrowed Landscape'

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

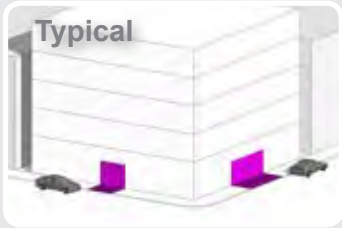
- Opportunity exists to reclaim key intersections as the most visible setting for community life within Kent Town, including better setting for existing businesses or new developments;
- Site planning should respond to the increased accessibility and reclaimed footprint of the corner sites;
- Consider 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

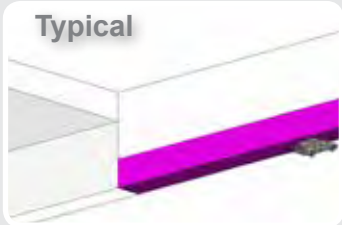
- Re-imagine service-orientated spaces to more intimate urban settings within the neighbourhood, acting as a front door to the increasing number of new developments facing onto the Little Streets, whilst maintaining service access;
- New public pedestrian linkages are encouraged within larger development 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.

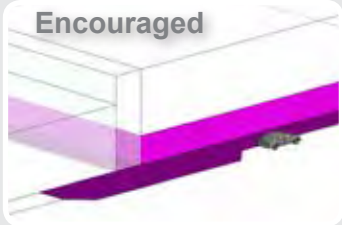
Forecourt Activation

- 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.

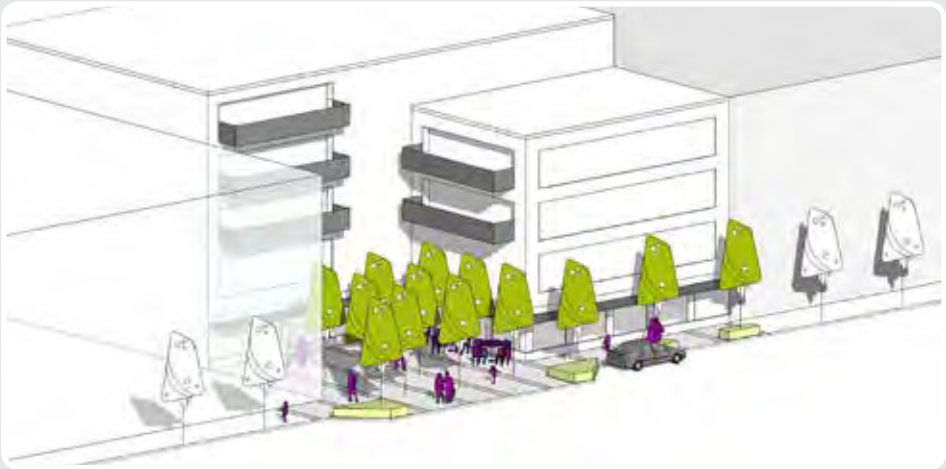


Corner Site Activation





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.

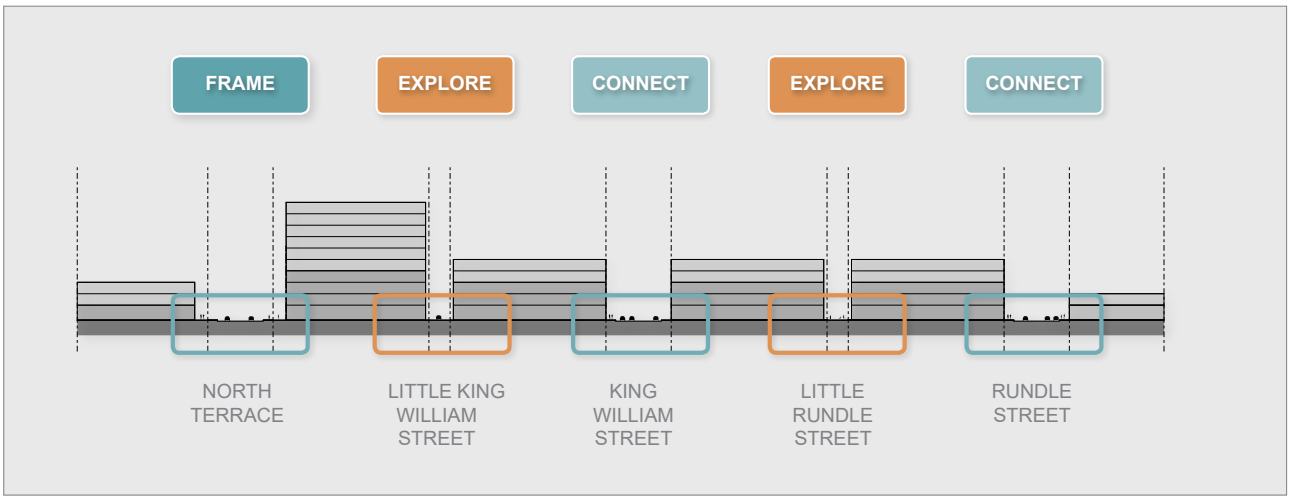


Illustration of *Link & Place* Concept

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

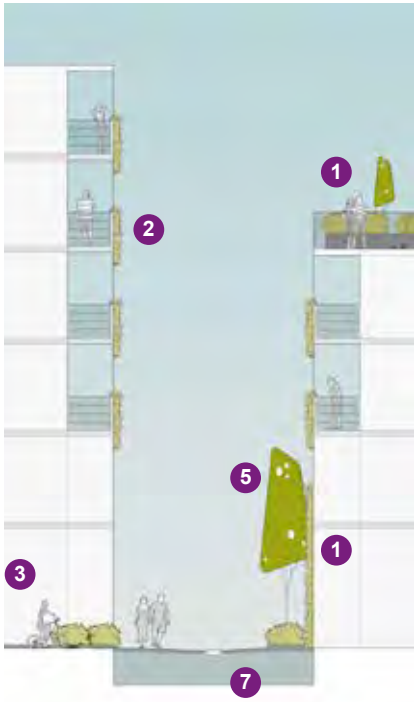
The design of new development across Kent Town should incorporate appropriate environmental design initiatives to improve the local micro-climate, including:

- 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.

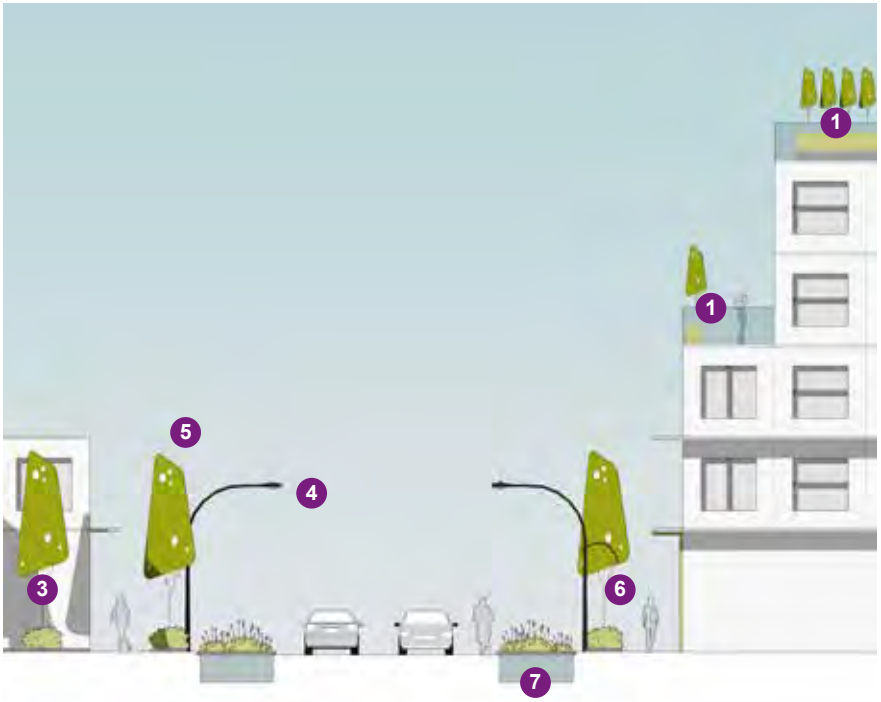
Greener Streets and Public Spaces

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.

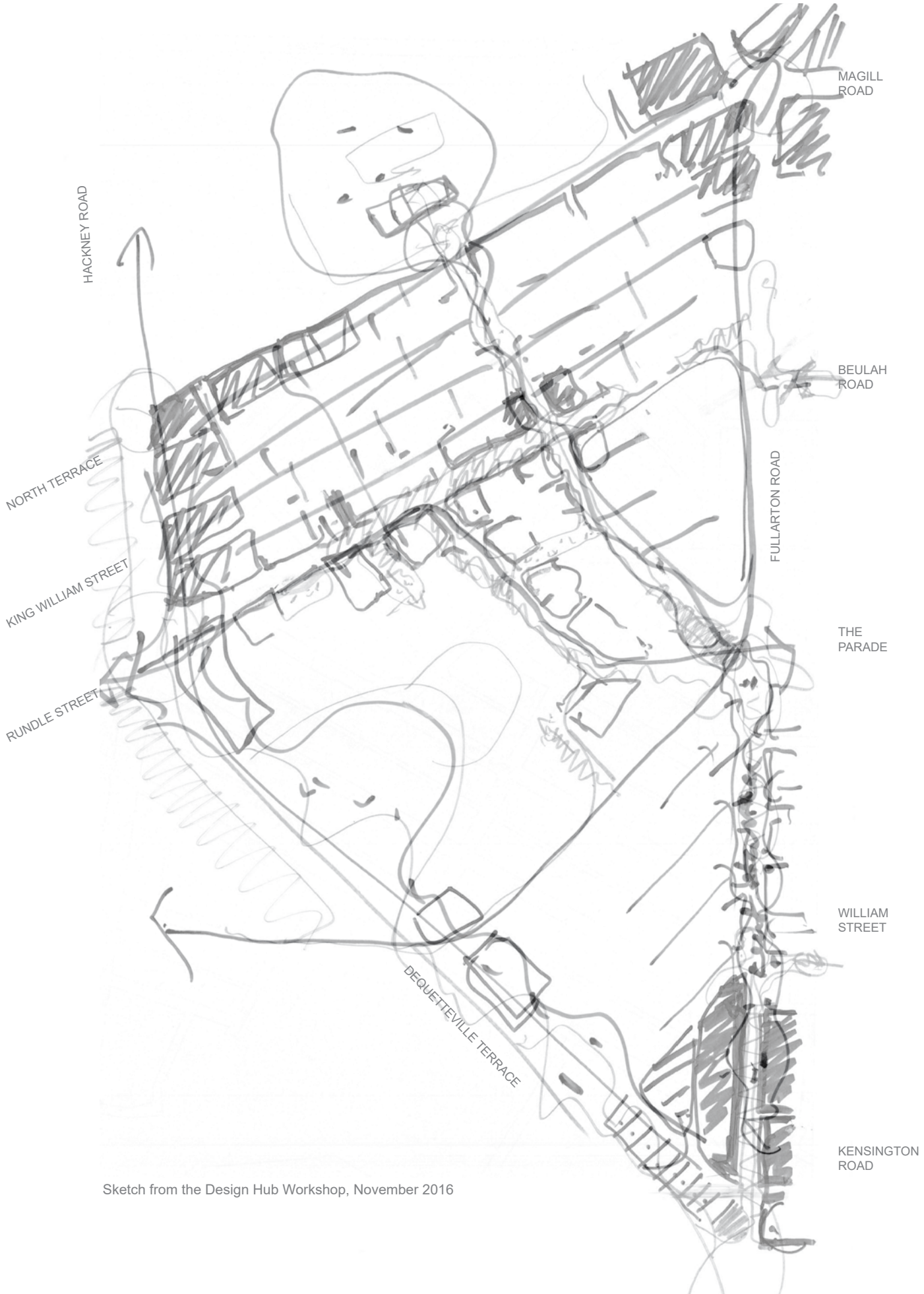
The Urban Design Framework recognises the following opportunities to demonstrate leadership and build stronger partnerships, through enabling change and determining the scale of change in the public realm.

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

COUNCIL / DEVELOPER - EARLY ENGAGEMENT

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

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

COUNCIL LED DESIGN PROCESS - ONGOING DEVELOPER ENGAGEMENT

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

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

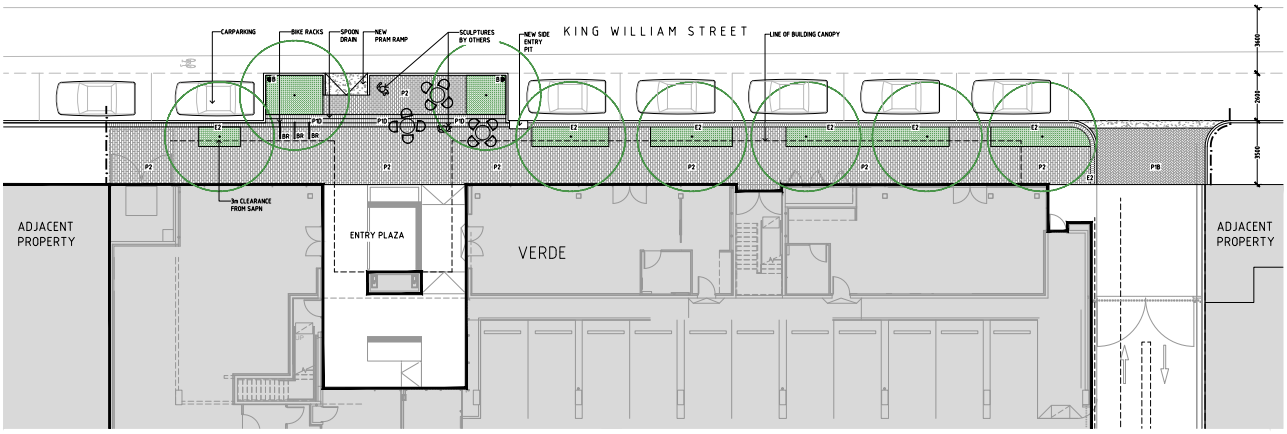
King William Street is proposed to be a tree lined pedestrian focused streetscape where new retail, hospitality and businesses can engage and activate the street. The enhancement to King William Street includes:

- 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).

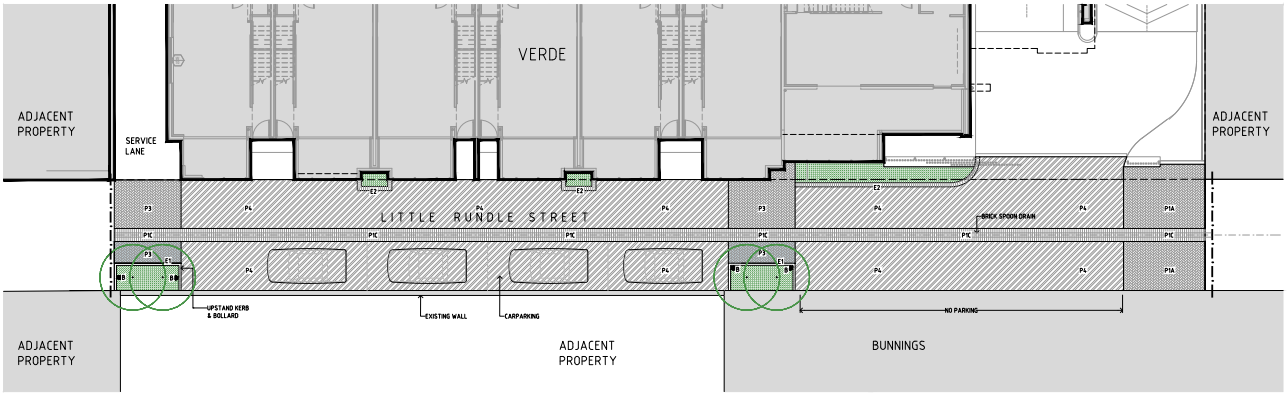
Little Rundle Street

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:

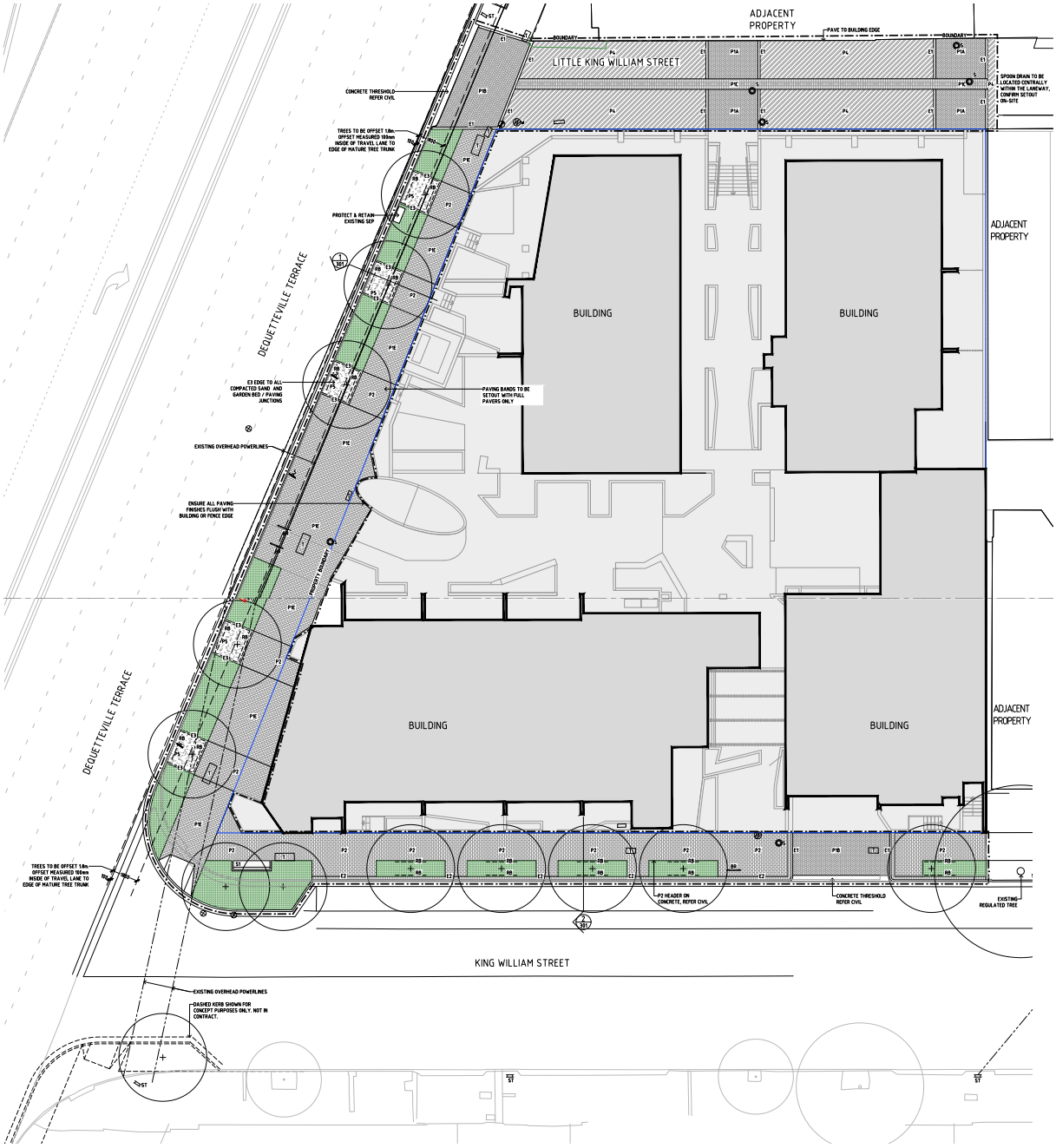
- footpath paving, which is proposed to be replicated along other main roads in Kent Town;
- street tree planting to increase tree canopy cover along Dequetteville Terrace;
- garden beds to improve the attractiveness of the street;
- street furniture such a bench, bike racks and a rubbish bin; and
- a corner kerb protuberance at the intersection with King William Street to improve pedestrian access and safety.

King William Street

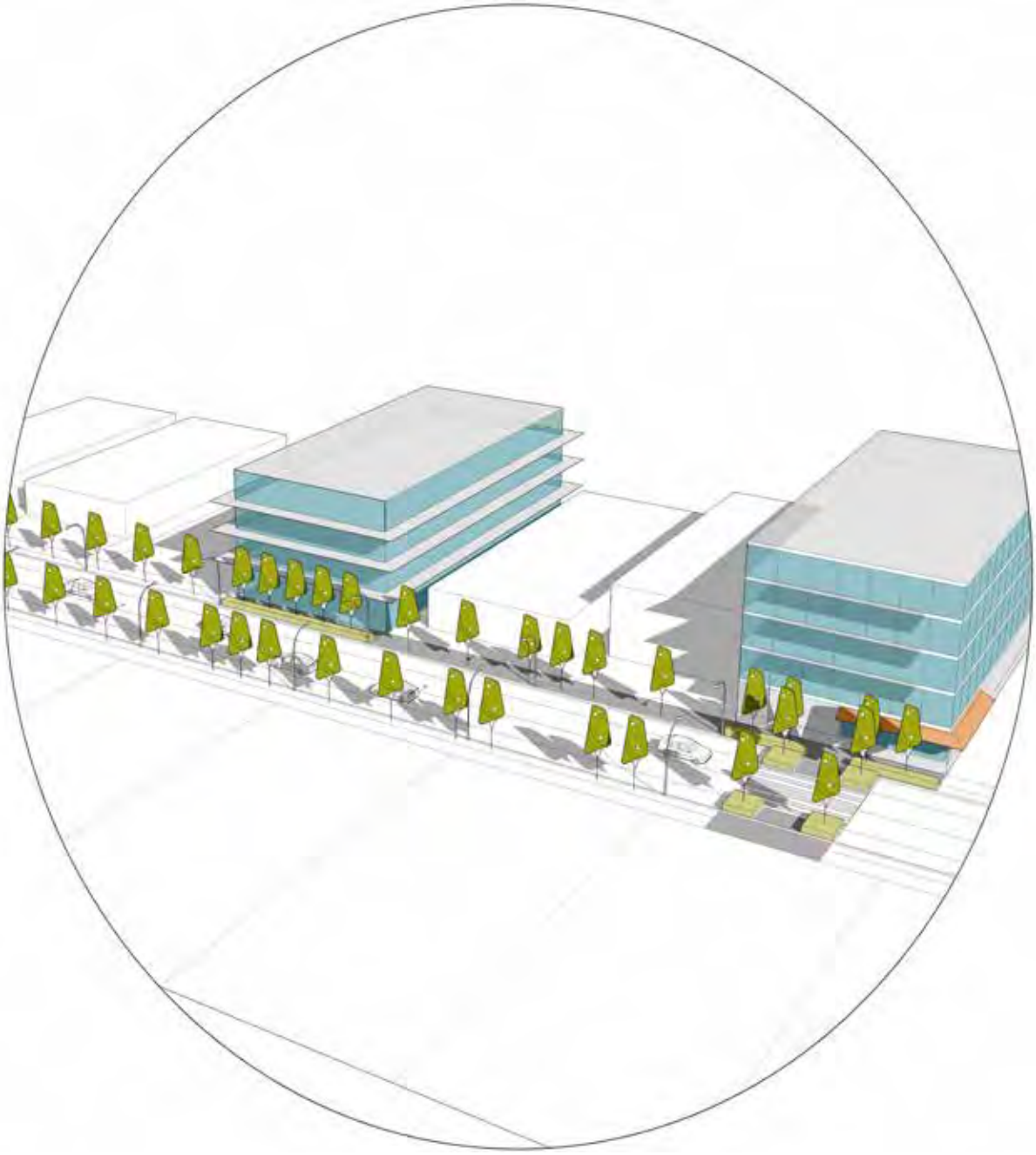
The streetscape improvements adjacent the East Park Apartments are similar to those on King William Street adjacent the Verde Living Apartments for consistency (refer to page 36).

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
Director – Communications & Policy
Master Builders Association of SA Inc
47 South Terrace Adelaide SA 5000
PO Box 10014 Adelaide BC SA 5000
M [redacted]
E [redacted]

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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

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Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

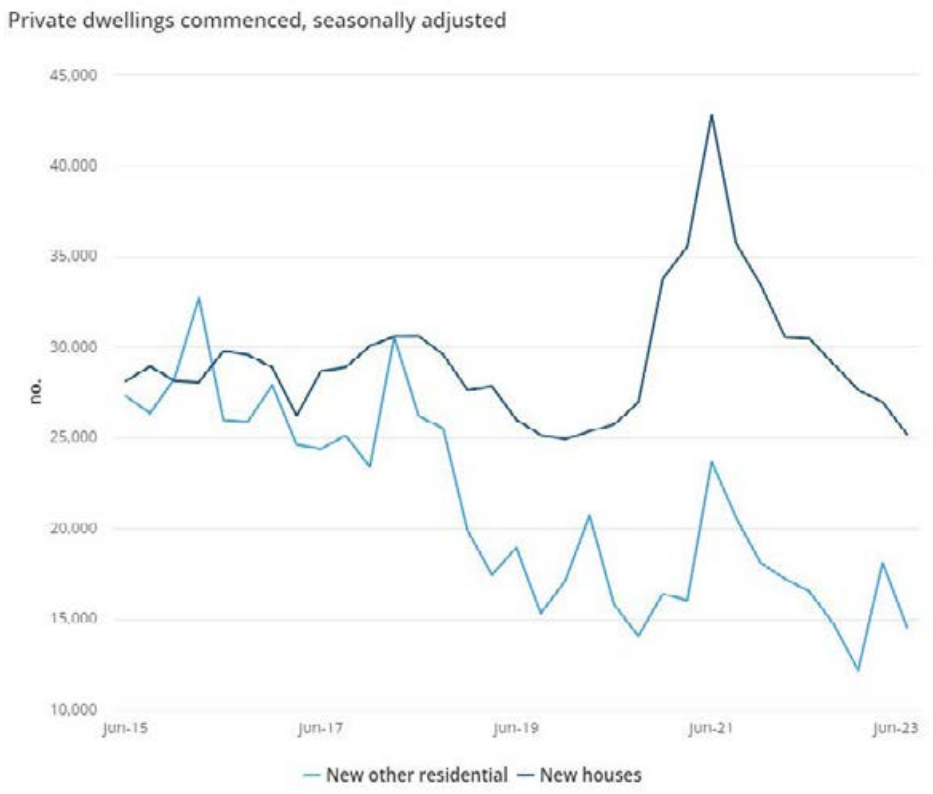
Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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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47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
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T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

- 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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

- 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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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:

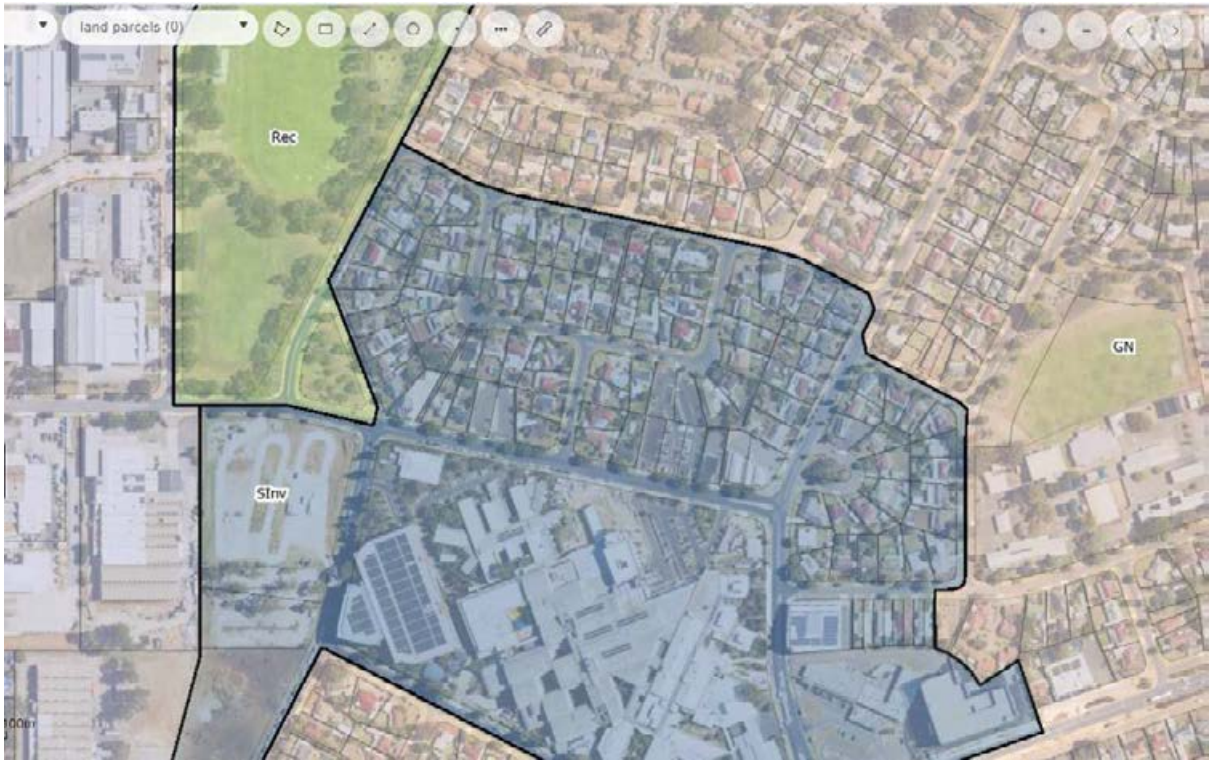

Figure 4: Image from SAPPA with Zones shown (Sinv = Suburban Innovation)

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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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. 200m² 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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47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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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47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
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mbasa.com.au

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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47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
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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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

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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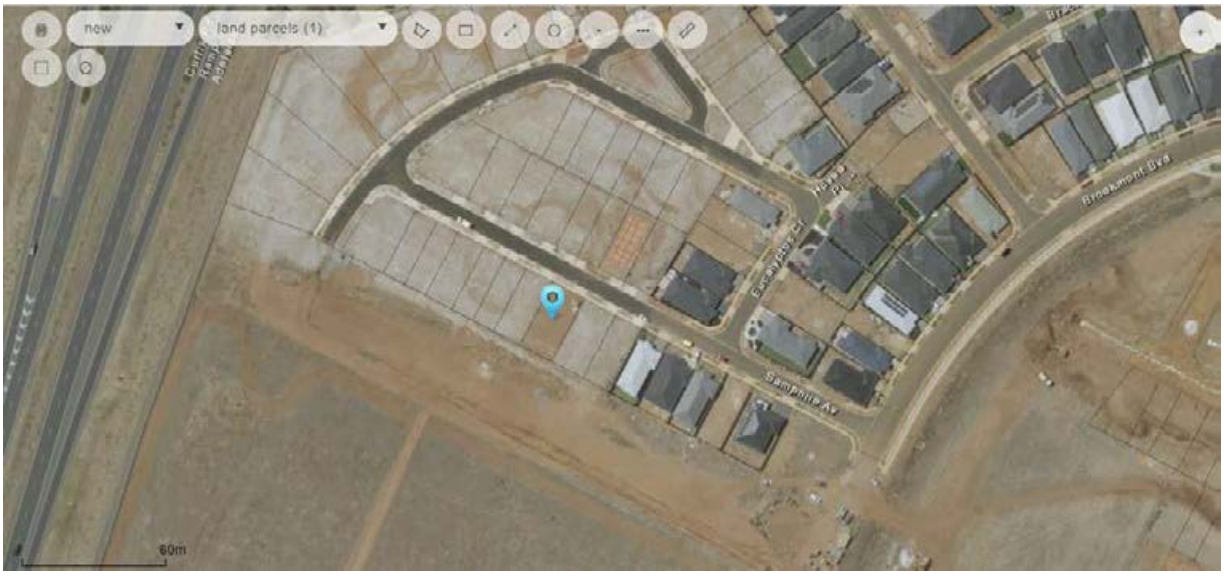
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

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

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au mbasa.com.au

"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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au

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.

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au
mbasa.com.au

REFERENCES & MAPS

Australian Housing and Urban Research Institute 2022 (online), 16 November; *Article: Why does Australia have a rental crisis, and what can be done about it?*

https://www.ahuri.edu.au/research/brief/why-does-australia-have-rental-crisis-and-what-can-be-done-about-it

Build Australia 31 July 2023 (online), *Materials inflation and labour shortages to increase the cost*

https://www.buildaustralia.com.au/news_article/cost-of-building-set-to-increase/

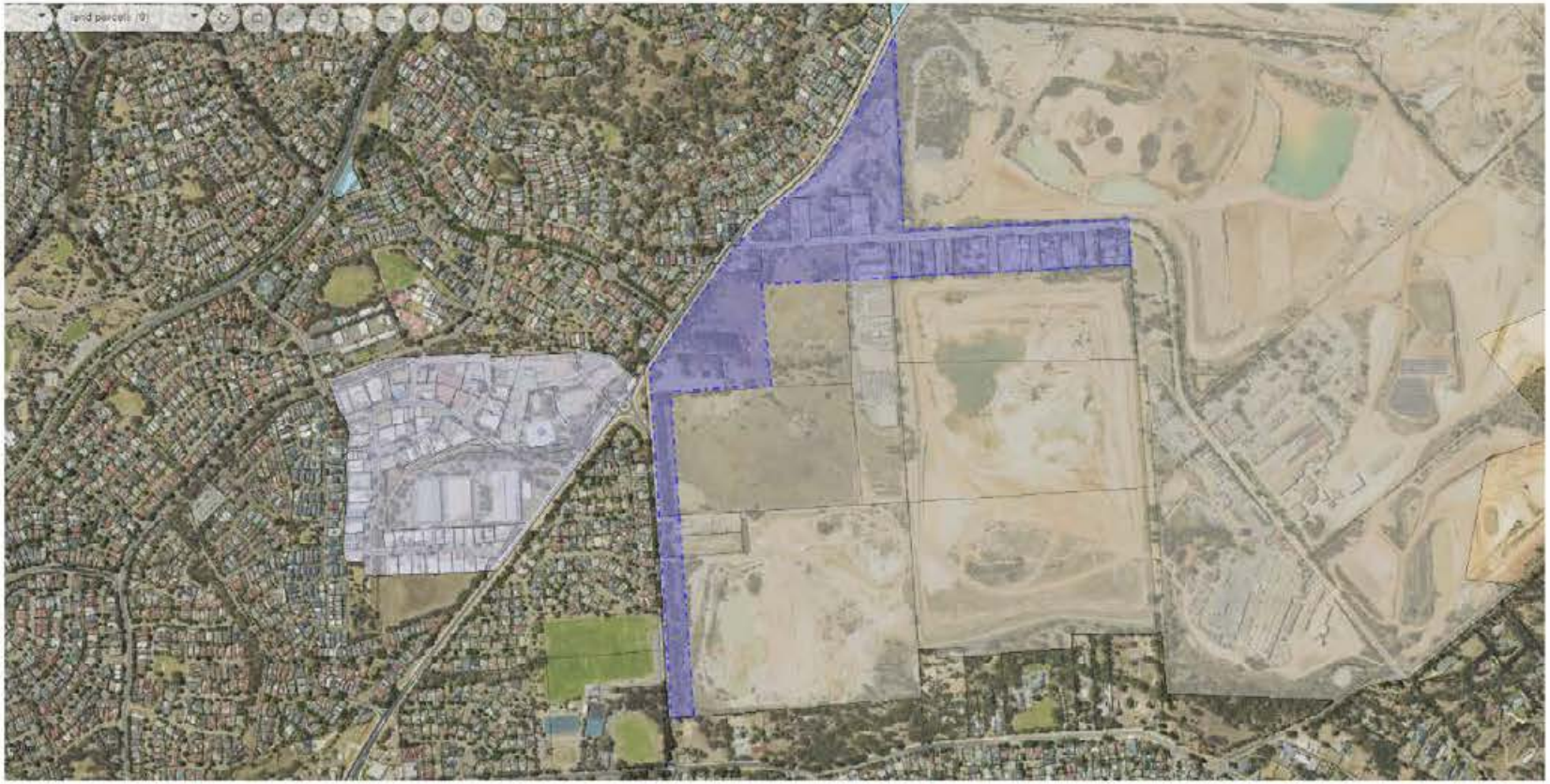
The Post, Adelaide 8 September 2023 (online)

https://thepostsa.au/infrastructure/2023/09/07/adelaides-great-but-greater-adelaides-getting-even-greater/

Master Builders Association of South Australia Inc. ABN 61 183 783 305
47 South Terrace Adelaide SA 5000 | PO Box 10014 Adelaide BC SA 5000
T 08 8211 7466 | F 08 8213 5240 | E acronin@mbasa.com.au

mbasa.com.au

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.

MOVING ADELAIDE BRIGHTON CEMENT AND REZONING PARTS OF THE LE FEVRE PENINSULA

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 2000m² 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:	
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
Attachments: image320651.png
image228874.gif
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MEA Submission _Greater Adelaide Regional Plan_ October 2023.pdf

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Good evening,

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

T: 1300 889 198 | PO Box 2438 Fortitude Valley QLD 4006
masterelectricians.com.au

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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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NATIONAL TRUST
South Australia

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.

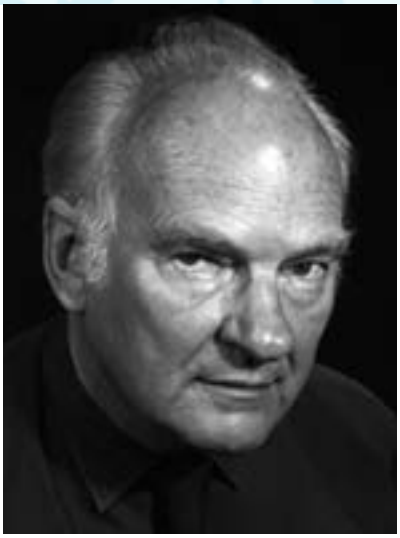
The second priority should be the conversion of all the metropolitan watercourses to linear parks, excepting only those that have been irrevocably transformed into closed underground sewers. Gaps in the existing linear parks at Dry Creek and Salisbury should be brought to completion and the Sturt River 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.

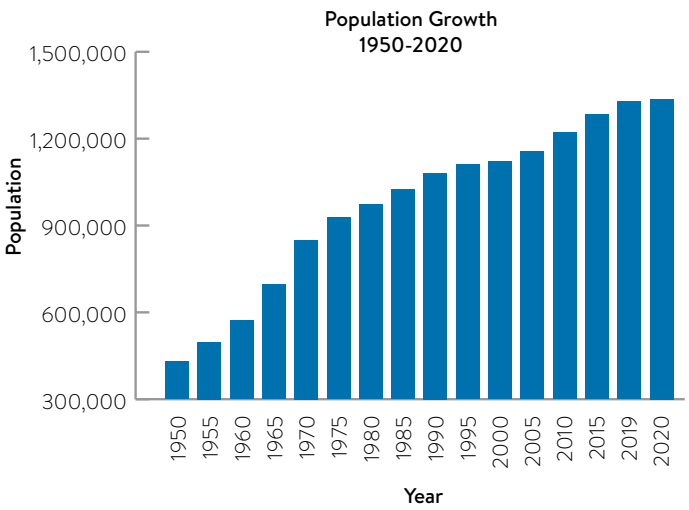
How we make use of that asset depends a lot on the size of the population it serves. That has been a subject of fierce debate.

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.

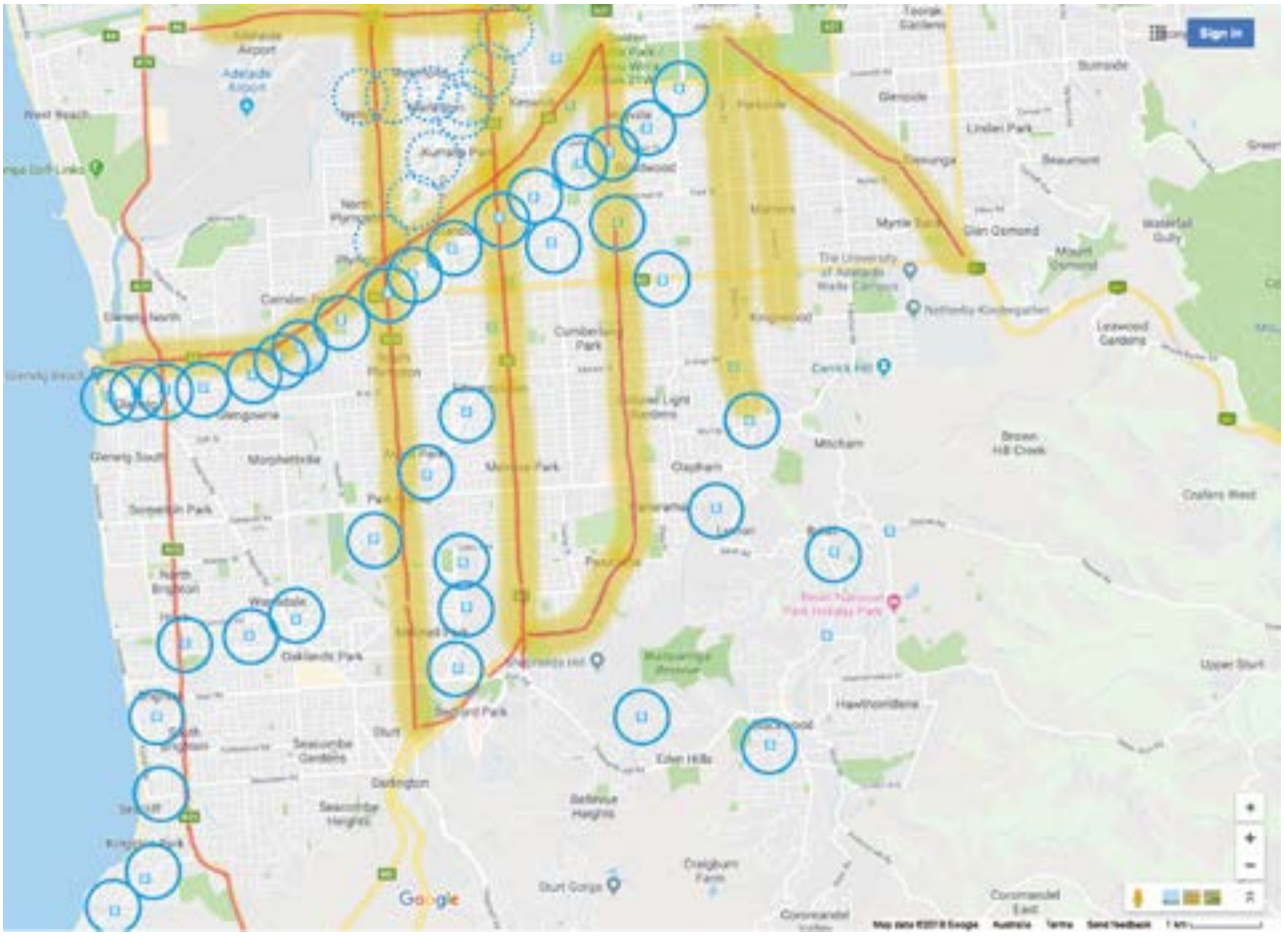
The high-growth model poses the biggest challenges to liveability, planning and infrastructure. So let us begin by asking the current question: how can significant population growth be accommodated?

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.

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.

ABOVE: Red shaded areas are industrial sites adjacent to rail lines

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.

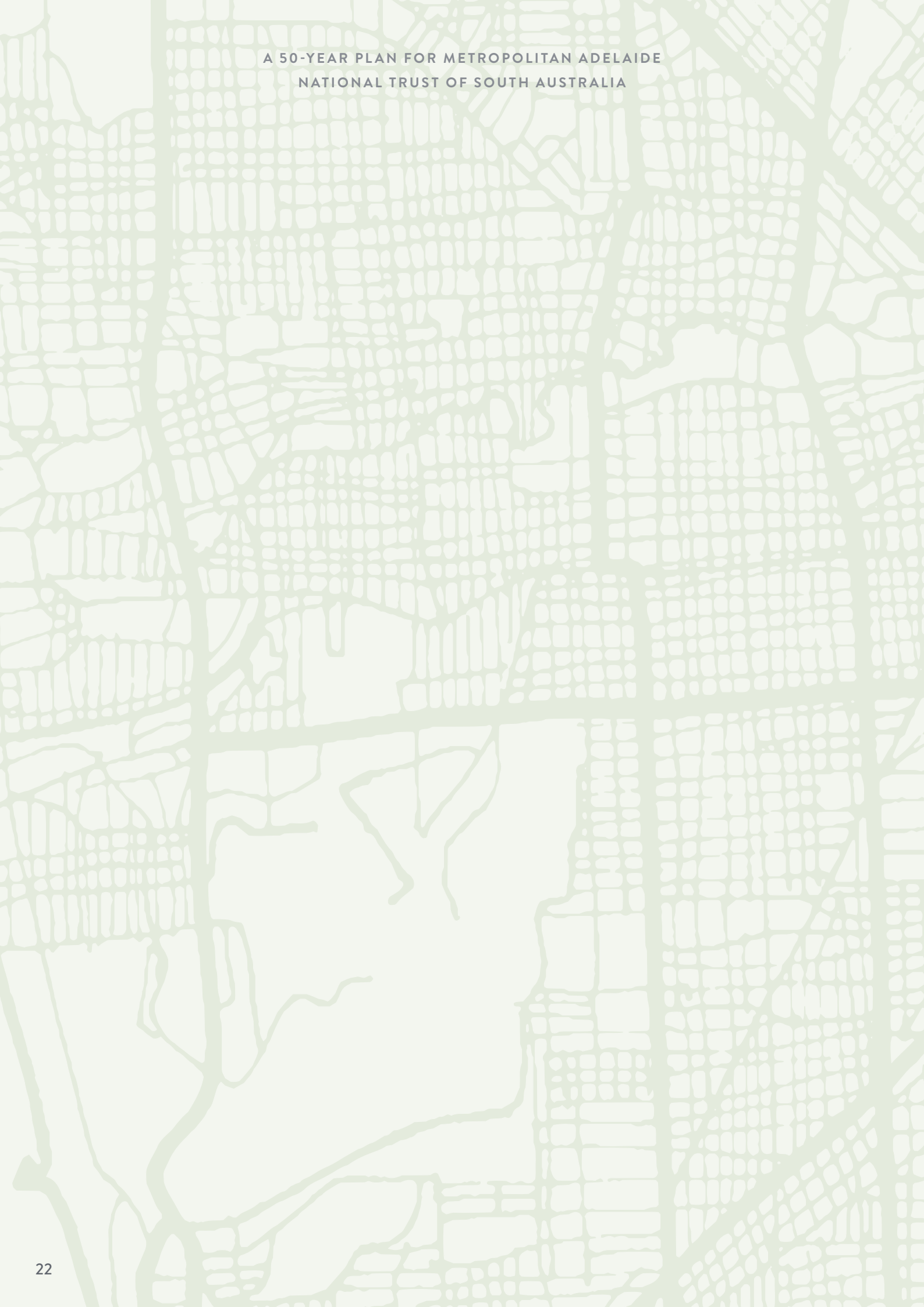
Only trains have the demonstrated capacity to move more people faster because they travel on single-purpose corridors unimpeded by traffic lights or other obstacles. Due to expense the time has passed for an underground system like those built when London, Paris and New York were about the size of present-day 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)

Jason Tyndall
Chief Executive
Nature Play SA

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

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

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

www.planning.org.au

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Submission to the State Planning Commission – Greater Adelaide Regional Plan Discussion Paper

Planning Institute of Australia (SA Division)

November 2023

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

E: [redacted]
M: [redacted]

Primary Producers SA Inc.
Ground Floor, 62 The Parade, NORWOOD SA 5067
PO Box 259, KENT TOWN DC SA 5071
T: 08 8297 0899
www.ppsa.org.au

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Primary Producers SA Inc.
Ground Floor, 62 The Parade
NORWOOD SA 5067
PO Box 259
KENT TOWN DC SA 5071
T: 08 8297 0899
ABN 75 266 051 838
www.ppsa.org.au

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

Via email plansasubmissions@sa.gov.au

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

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.

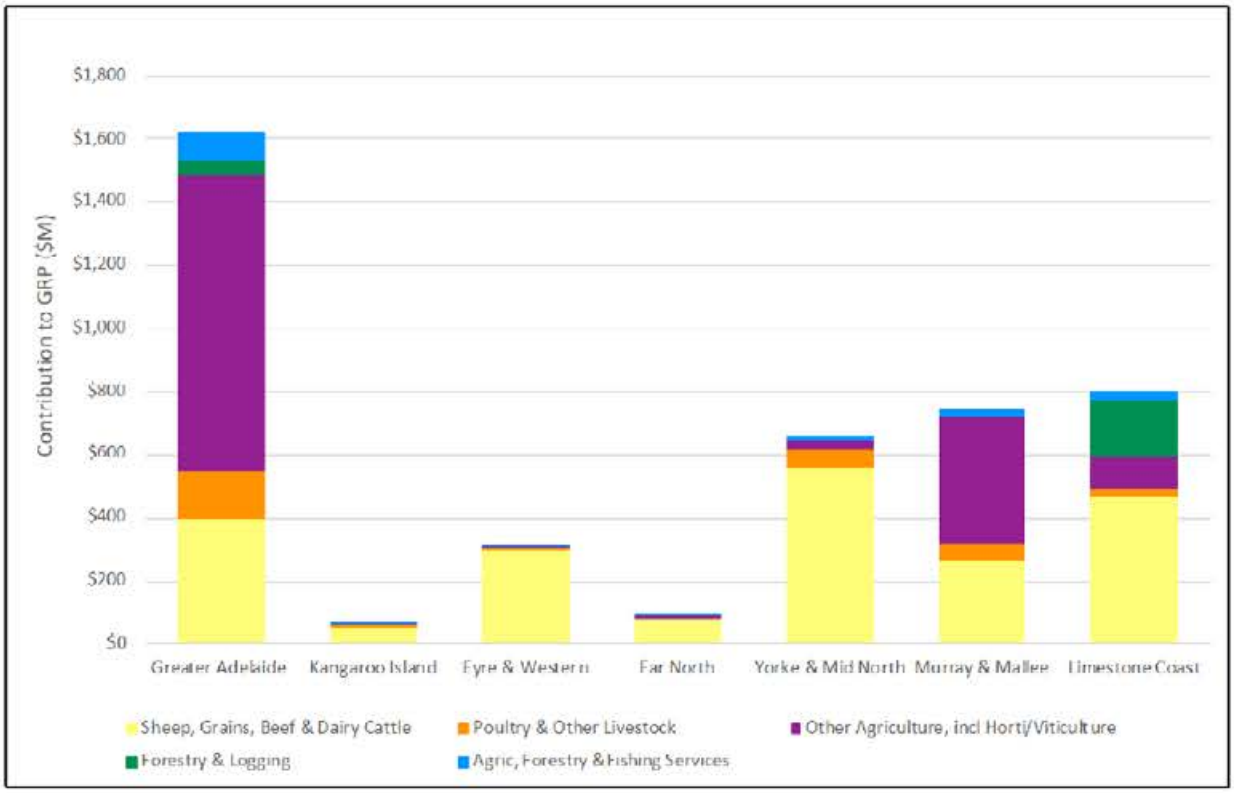

Figure 2: Contribution to Gross Regional Product by generalised primary industry sectors for South Australian Planning Regions*, 2022. *Source: REMPLAN (2022 Release 2) and PIRSA.* *To correspond with current regional plans, the Greater Adelaide region includes Murray Bridge but excludes Kangaroo Island, 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.

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*

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Retirement Living Council Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:20:45 PM
Attachments: image001.jpg
image002.png
RLC Submission GARP.pdf

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Good afternoon,

On behalf of the Retirement Living Council, please see the attached submission to the Greater Adelaide Regional Plan Discussion Paper.

Kind regards,

Oliver Luckhurst-Smith
National Policy Manager | Retirement Living

Accreditation | Greenways Retirement Village

Property Council of Australia
Level 4, 91 King William Street, Adelaide
P [redacted]
M [redacted]
W propertycouncil.com.au
@propertycouncil

Great cities | **Strong** economies | **Sustainable** communities

PROPERTY COUNCIL of Australia | Retirement Living

6 November 2023

Greater Adelaide Regional Plan

State Planning Commission

Retirement Living Council's Response to Discussion Paper

About the retirement living industry

Retirement communities offer a unique housing option that enhances wellbeing and lifespan for older Australians. Importantly, these communities can delay entry into residential aged care, and in some cases can even prevent it entirely.

Independent data shows that residents in retirement communities are on average happier, healthier (both mentally and physically) and are more socially connected and active.

Importantly for the aged care and health sectors, research helps inform industry and government that residents in retirement communities have reduced interactions with GPs and hospitals and delayed entry into aged care. This results in significant cost efficiencies for governments by reducing pressure on the aged care and health sectors.

As a result, there is great potential to increase these benefits to governments if the retirement industry is provided the requisite support to evolve and grow to meet the increasing needs of Australia's ageing population.

When older South Australians are able to rightsize, they not only improve their quality of life but also contribute to societal, economic and environmental benefits for our state. It also brings with it the added benefit of freeing up traditional housing stock for young people, couples and growing families.

About the Retirement Living Council

The Retirement Living Council (RLC) is the national peak body for Australia's retirement living sector, championing policies that deliver age-friendly homes and better services in retirement communities.

The RLC sits within the Property Council of Australia's national advocacy team and is the most powerful voice of the sector, representing national retirement village and seniors living community operators, including for-profit and not-for-profit providers.

PROPERTY COUNCIL of Australia | Retirement Living

Response to Discussion Paper

The RLC welcomes the opportunity to respond to the State Planning Commission's discussion paper on the Greater Adelaide Regional Plan (the plan).

As the successor to the 30-Year Plan for Greater Adelaide, it is imperative that this new plan provides for adequate and diverse housing solutions for South Australians at all phases of their lives.

It is no secret that Australia, South Australia in particular, is undergoing a major demographic change. The *2023 Intergenerational Report* identifies that there are currently 4.6 million people aged over 65 today, growing to 7.1 million by 2043.

There are currently 166,000 South Australians over 75 today, growing to 256,000 in 2040. This means there are 256,000 reasons to ensure that ageing remains a strategic priority for the State Government.

While the discussion paper does make reference to the 19.3 per cent of South Australians over 65, this is the extent of discussion about our ageing demography. This sits in contrast with the 2017 update of the 30-Year Plan for Greater Adelaide (30-Year Plan), which acknowledged:

> "Our baby boomers (who represent a quarter of our population) are either moving into retirement or are already retired. Many wish to downsize and move into accommodation that better suits their needs and lifestyles."[1]

At the heart of its submission, the RLC notes that retirement communities meet the needs of the ageing population by providing an environment where older Australians are able to maintain their independence and lifestyle, with ready access to health, wellbeing, care and support services.

Across the country, the retirement living industry's market penetration of over-75s is 12.6 per cent, meaning this purpose-built housing type is doing important work for both consumers and governments.

Therefore, more emphasis needs to be placed on the diversity of housing options available to ageing South Australians, like retirement communities, including a **reinstatement of 2017 references to 'downsizing' or 'rightsizing' into future decision-making around accommodation for older South Australians**.

[1] The 30-Year Plan for Greater Adelaide, 2017 Update, p 152

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

The Guiding Outcomes, particularly as they relate to "A more equitable and socially cohesive place" and "A greater choice of housing in the right places" should be expanded to highlight the need for a diversity of age-appropriate housing types.

South Australia's Plan for Ageing Well 2020-2025 sets a strategic theme to investigate "Models and options for creating homes that suit the diversity of needs and aspirations" for older South Australians.[2] Action 27 of the 30-Year Plan required the development of a "policy framework to support projects that provide for aged care and retirement accommodation to meet growing demand."[3] The RLC submits **the reintroduction of this action item in the Greater Adelaide Regional Plan would positively signal consideration of these housing options for ageing South Australians**.

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

Addressing the supply pipeline

Retirement units across South Australia (particularly in metropolitan areas) are effectively at full capacity, however despite this, the *2022 PwC/Property Council Retirement Census* indicates that there are only 181 units scheduled in the supply pipeline until 2025.[4]

While the Planning and Design Code does provide for 'retirement facilities' to feature as deemed-to-satisfy items in certain planning applications, more can be done to incentivize the development of retirement communities to ensure a steady supply pipeline into the future.

One way of ensuring housing diversity and the freeing up of older stock is to **establish minimum land allocations for retirement communities in new greenfield developments**.

Greater access to land for retirement communities through minimum land allocations in under-supplied areas, similar to targets placed on social and affordable housing can ensure suitable options for the ageing population, as well as address housing supply issues. **The RLC is also advocating for the inclusion of retirement facilities under the Housing Australia Future Fund as a key delivery component of achieving South Australia's supply target.**

Dwelling suitability

The 2017 update of the 30-Year Plan for Greater Adelaide identified that 62 per cent of households have fewer than three residents but 72 per cent of dwellings have three of four bedrooms.[5] In 2021, nearly three quarters of people aged 75 and over were living in dwellings where they have one or

[2] *South Australia's Plan for Ageing Well 2020-2025* p 30
[3] *The 30-Year Plan for Greater Adelaide, 2017 Update*, p 70
[4] *2022 PWC Property Council Retirement Census*, p 7
[5] *The 30-Year Plan for Greater Adelaide, 2017 Update*, p 152

more bedrooms spare. This represents more than 1.4 million older Australians that are residing in dwellings that are oversized for their needs.

This inefficient use of space also adds pressure on existing housing supply challenges. Due to slow supply, Australia is expected to see a shortage of 101,400 dwellings between 2023 and 2030. Freeing up housing stock can work to address these challenges. The Greater Adelaide Regional Plan is targeting 300,000 new homes for South Australia by 2051 alone.

At the same time, one in five Australians over 65 also require assistance with domestic tasks, including property maintenance (20 per cent) and household chores (16 per cent). These needs rank second and third only to healthcare.

This suggests that the majority of older people are not rightsizing, and many are requiring extra supports to continue living in their family home. Larger dwellings can also increase health risks as people age, with most cases of falls in older people occurring at home. Features such as stairs without railings, clutter or poor lighting can create hazards for older people.

Affordability

Addressing the 'missing middle' requires a diversity of housing options that enable affordable living. Retirement living is designed to provide an affordable rightsizing option, with entry prices for an average 2-bedroom unit in metropolitan Adelaide being 44 per cent lower than the median house price in the same postcode. Outside metropolitan Adelaide, units across the rest of South Australia are 36 per cent more affordable.

Across Australia, the average two bed Independent Living Unit (ILU) price grew by 6.6 per cent over the 18 months to December 2022, while national house prices over the same period rose by 26.2 per cent indicating a less volatile retirement market than what has been experienced in South Australia in the recent past.

Increasing density with more care and support services

While a conventionally single storey housing proposition, there has been an increase in the development of vertical communities, which better enable these communities to be developed in high-density areas, allowing residents to better access the resources and amenities of their broader, local area.

Additionally, 53 per cent of new villages under development have indicated that a residential aged care facility will be provided on-site or co-located.[6] While retirement communities already enhance residents' health through onsite access to healthcare professionals, the co-location of offerings such as aged care allows a more supportive environment as residents requirements change.

[6] *2022 PWC Property Council Retirement Census* p 7

Energy efficiency

Rightsizing can allow a more efficient use of energy by households, therefore reducing the overall annual energy consumption for older Australians by around 35 per cent.

Energy usage is driven by the size of the dwelling and number of occupants residing in it. Larger spaces require more operational energy driven by temperature regulation, such as cooling and heating. A larger number of occupants also drive energy usage of a dwelling, mainly due to more frequent usage of temperature regulation, appliances and electronic devices.

When rightsizing occurs, a retired couple is assumed to move into a retirement dwelling, allowing a family of four to move into the vacant dwelling. While this leads to a 17 per cent increase in energy consumption of the family, despite this, rightsizing results in a net reduction of 7 per cent.

In Conclusion

The RLC appreciates the opportunity to share our leading industry insights with the State Planning Commission. The Greater Adelaide Regional Plan is an important document to set the tone for development priorities in the future.

While the RLC remains agnostic on many of the themes explored in Part 2, 'Where should Greater Adelaide grow?', we agree that housing availability and affordability will remain a key driver for South Australians for years to come.

At present, the Greater Adelaide Regional Plan does not give the same consideration to age demographics and the housing types required to service these demographics that the 30-Year Plan did, which we request is addressed in future iterations.

A balance between government funding, consumer choice, and industry innovation is essential to create an inclusive, adaptable, and effective housing landscape.

Essentially, we believe that success is achieved through empowering consumers with choice, supporting innovation, and delineating appropriate roles for both government and private investment which will drive the evolution of housing across Australia.

Daniel Gannon

Executive Director
Retirement Living Council

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Tuesday, 7 November 2023 4:46:57 PM
Attachments: image001.png
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20231106 Property Council GARP Submission v01 rgf.docx

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To whom it may concern,

On behalf of the Property Council, please find attached our submission re the Greater Adelaide Regional Plan.

Regards

Richard Fowler
Deputy Executive Director

Property Council of Australia
Level 4/91 King William St Adelaide
T [redacted]
M [redacted]
E [redacted]
W propertycouncil.com.au
@propertycouncil

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Property Council of Australia ABN 13 00847 4422
A Level 4, 91 King William Street, Adelaide SA 5000
T +61 8 8236 0900
E info@propertycouncil.com.au
W propertycouncil.com.au
@propertycouncil

6th November 2023

Property Council – Greater Adelaide Regional Plan

The Property Council welcomes the opportunity to provide a response to the Greater Adelaide Regional Plan discussion paper.

The Property Council of Australia is the leading advocate for Australia's largest industry – property.

Our members have a direct interest in the policies that guide land use planning in Greater Adelaide and South Australia.

Our industry represents 13% of Australia's GDP and employs 1.4 million Australians. Property Council member organisations are investors, owners and managers of real estate across all major asset classes including commercial, offices, residential, industrial, hotels and more.

A cohesive vision and plan for how land is used in the Greater Adelaide region is critical in ensuring adequate provision of infrastructure, housing and amenity to that supports the built form requirements of our economy and the communities that sustain it.

Our response is structured under the four major outcome areas outlined in the discussion paper, namely:

1. A greener, wilder and climate resilient environment
2. A more equitable and socially cohesive place
3. A strong economy built on a smarter, cleaner, regenerative future
4. A greater choice of housing in the right places

We thank the Minister for consideration of our submission.

Bruce Djite
SA Executive Director, Property Council

1. A greener, wilder and climate resilient environment

South Australia is a leader in renewable energy generation and recognises the importance of decarbonisation for climate resilience, however the 30-year plan should more explicitly recognise the crucial role of the built environment in achieving decarbonisation by 2050 and should prioritise a policy framework to support ambitious targets for both new and existing buildings.

The Property Council advocates that the Greater Adelaide Regional Plan:

Reduce energy emissions through adaptation of existing buildings and well-designed new buildings.

New buildings must be high-performance and energy efficient. This requires NCC controls, ratings schemes and incentives. While a local approach to implementation is important, the Property Council also advocates for a nationally consistent methodology for the measurement of factors such as embodied carbon, lifecycle analysis, thermal performance requirements and energy usage, and applying a cohesive approach across commercial, industrial and residential buildings. In addition, reporting frameworks need to be consistent to support accurate and credible sustainability claims, which in turn incentivises good performance.

Key Points

1. **Promote climate resilient buildings.**
   This strategy will ensure new buildings are energy efficient having financial benefits for future occupants. The implementation of climate resilient buildings should be an incentive-based approach that enables industry to adapt and capitalise on the economic opportunities that can be achieved.

2. **Adapt existing buildings.**
   Most of the building stock we will use in 2050 is in existence today. Existing buildings are therefore critical in addressing emissions reduction targets. Policies should increase support and funding for electrification and thermal retrofitting of existing building stock.

3. **Support market transition.**
   To ensure a positive impact on the economy, the GARP should include policy and funding to promote a market transition to create skills training and employment in sustainable industries such as energy generation, retrofitting, manufacturing and electrification. This will assist trades to reskill away from the standard approach and will also assist professional bodies to implement changes to design standards and reporting.

Climate Change Resilience through Sustainable Development – Existing and New Communities.

As more people than ever are living in urban environments, we need to reimagine the way cities are designed, as well as their critical role in assisting with adaptation to and mitigation of climate impacts. Decisive action is required to avoid the worst projected impacts of climate change. Adelaide and its environs must shift towards the provision of high amenity, high liveability, medium-density metropolitan living, supported by great public transport. This is critical for both infill and new development.

Key Points

1. **Sustainable Greenfield Developments.**
   Release of new greenfield developments should be subject to best practice sustainable planning and should have associated and linked investment in mass transit networks to reduce vehicle travel.

   The Property Council supports the establishment of infrastructure and growth compacts between state and local governments to better align housing delivery with economic and social infrastructure. These should deliver new housing at the same time as transport, schools, libraries, shops and public spaces, to support the 'living locally' approach presented in the GARP Discussion Paper.

2. **Well designed and located strategic infill can enhance sustainability.**
   Strategic infill development and renewal should be strongly prioritised to intensify development around existing transit and local community hubs (including suburban and regional locations). These developments should be matched by expenditure on social infrastructure and outdoor space, greening and natural restoration, as higher targets are required to support successful higher density communities. We also call for investment in research to build a strong evidence base that supports the business case for amenity and sustainable infrastructure.

Rethinking transportation to build more climate change resilient cities.

Transport is the largest contributor to greenhouse gas emissions in the state, responsible for 29% of all emissions. The design of Australian cities fundamentally influences individual behaviour – we are dealing with a legacy that promotes private vehicle use and makes active and mass transit difficult. We need to plan cities for better transport, dramatically shifting investment in our transport infrastructure towards a more sustainable direction, and this needs to work closely with development projects to ensure coordinated outcomes.

Key Points

1. **Plan growth to promote the use of sustainable transport modes.**
   We call for the creation of integrated transport authorities to ensure we improve sustainable mobility within our cities and explore sources of redirected investment capital to fund mass and active transport infrastructure deficits. Transportation strategies should dramatically reduce car dependency.

2. **Redirect investment to active transit and sustainable mass transportation networks.**
   Investment in infrastructure projects including train, tram networks and bus networks should be increased. Infill and new development should where possible include bikeway infrastructure and separated bike lanes.

3. **Develop transport strategies that reduce car dependency.**
   New building projects should also foster active transit, through reduction in minimum requirements for residential car parks and an increase in the minimum provision for alternate transport e.g., secure cycle storage and end of trip facilities. It is recognised that the transition away from car dependency will involve social change as well as physical changes to the environment.

Support 'rewilding' of urban areas

We rely on urban nature to improve social and environmental conditions and to add amenity value to our cities. Confronting the challenges of global warming and environmental decline requires new forms of infrastructure and new approaches to landscape planning and management in urban and regional settlements.

Key Points

1. **Plan green infrastructure and biodiversity into projects.**
   Planning for growth should include green infrastructure and biodiversity planning techniques that cross jurisdictional and site boundaries. It should be considered at an infrastructure systems level, as they are reliant on interwoven ecosystems, waterways, land and habitat corridors. The GARP could include broad ecosystems management strategies that can be measured, valued and deployed at a scale that transcends private and public land, geographical boundaries, and that can clearly inform and improve development. These considerations should however not impede the rate of development but rather inform better planning and management of land.

2. **Provide strategies to promote urban greening.**
   Development should include stronger targets to reduce impermeable hard surfaces and identify all potential area for greening, including verges, streets with integration into buildings, for thermal regulation, shade, and food production. Clarity of regulation and incentives are required to increase greening and habitat replacement within developments, and more cohesive integration into buildings. Opportunities for economic growth through sustainable green infrastructure should be identified, such as small scale innovative urban agricultural development into existing urban fabric.

3. **Promote evidence-based frameworks.**
   Rewilding is hard to achieve when its contribution is not measured within an economic framework. We call for high quality green infrastructure research to promote its value and to improve policy formulation. We advocate for strong industry engagement and funding in green infrastructure strategies for urban design and development. All the new and infill development proposed in the GARP is a key opportunity to reconnect cities with the natural world and its resources, and to integrate the restoration of ecosystem functions into urban contexts.

2. A more equitable and socially cohesive place

Social and service infrastructure is closely tied to how we live. Infrastructure shapes our cities, connects people to places, affects our health and wellbeing, and influences our future prosperity.

To provide an equitable and socially cohesive place infrastructure needs to be carefully planned and ready to be delivered as the demand arises.

The Government, State Planning Commission and infrastructure providers must demonstrate strategic leadership in planning, and establishing delivery frameworks, for the infrastructure that underpins our community.

Infrastructure therefore is not just the realm of engineers and planners but requires an evidence-based approach that involves a range of disciplines to maximise the benefit of infrastructure investments.

Our members are seeking an approach to infrastructure planning that creates confidence, is transparent, equitable, evidence-based, and predictable. The current ad hoc nature of infrastructure negotiations is unsustainable and creates costly delays to all parties. The infrastructure liability associated with projects in a time of escalating project costs, has added significant risk to projects at all scales, including small infill sites or significant urban growth projects. It is not only creating costly delays but is a key contributor to "the housing crises".

The GARP should encourage State and Local Government to prioritise infrastructure planning and understanding the capacity of what's above and below the ground. The capacity of stormwater systems and local street networks is often not well understood and is important to the growth of minor infill and strategic infill sites. A greater emphasis on standardisation of infrastructure requirements would assist in enabling infrastructure to be costed into projects upfront and before significant commitments have been made.

The Planning, Development and Infrastructure Act 2016 identifies that a regional plan must include a long-term vision for the region, including 'provisions about the integration of land use, transport infrastructure and the public realm'. Thus, infrastructure and services will need to be front of mind in this new plan.

The Property Council advocates that the Greater Adelaide Regional Plan:

Provides a clear connection between growth precincts and infrastructure planning.

The GARP is a plan to manage growth and change. It will identify precincts where our growing population will be accommodated and where employment opportunities will be created. In areas for growth the required trunk infrastructure must be understood, including utility infrastructure. At the local level, infill precincts will need to be evaluated to determine the potential need for upgrades to local infrastructure. Councils should be proactive and investigate these issues for inclusion in the plan.

Key Points

1. **Evidence-based planning – identify what infrastructure is needed and when.**
   The GARP must identify the high-level infrastructure requirements for growth areas and the trigger points for infrastructure provision. This provides certainty around the economic cost and investment required for growth precincts. This will require an evidence-based approach to understand existing capacities and requirements.

Includes clear guiding principles to inform funding contributions and delivery of infrastructure.

While the private sector has a role in contributing to infrastructure costs, greater certainty about what needs to be contributed and when, is crucial in the financial viability and risk profile of projects. Having clear principles to guide infrastructure funding would provide greater confidence and reduce case-by-case negotiations causing costly project delays.

The required social and physical infrastructure requirements for growth precincts should be identified upfront and the infrastructure delivery mechanism identified. Figure 5 in the Discussion Paper identifies an infrastructure cost schematic. While an individual development can trigger new infrastructure at the state level (e.g., an arterial road), the beneficiary of the infrastructure is far reaching.

Key Points

1. **Predictability of costs and requirements.**
   The development industry benefits from logical and predicable requirements that can be costed into projects upfront. Understanding contribution expectations at the feasibility stage of projects is critical.

2. **Fair and equitable infrastructure models.**
   Contributions should be fair and equitable and reflect the range of beneficiaries of the infrastructure. Proponents should not be required to fund legacy issues or make the full contribution where they are the last project to 'tip it over'. Currently, there is no oversight of infrastructure charges imposed by Councils, which can vary significantly and create significant uncertainty.

3. **Strong governance to support infrastructure planning and delivery.**
   The alignment of State and Local Governments and other infrastructure providers is critical to ensure infrastructure is delivered for growth precincts. This includes service providers such as SA Water, SAPN and DIT whose alignment is required to provide support for growth priorities.

Identify social infrastructure requirements and land to accommodate it through master planning processes.

Key points

1. **Locational challenges for social infrastructure**
   GARP should assist in breaking down perceptions about where social infrastructure should be located, particularly related to affordable and social housing and mental health. These uses should have simplified planning processes with zones that encourage their development and allow movement between land uses i.e., aged care to mental health, hotel to hospital etc.). Early engagement in strategic planning for human services to facilitate effective infrastructure planning providing efficiencies across multiple stakeholders and best mix of physical infrastructure in the right locations.

2. **Land availability for social infrastructure**
   Undertaking social infrastructure assessments assist in ensuring needs can be addressed through the development of master planned communities. Currently, not for profit organisations and government agencies compete for land in well located areas to provide the required services. New approaches to resolving this issue could be an action in the GARP.

3. **Sustainable planning with a long-term view**
   Embed sustainability principles into the planning, design and delivery of infrastructure and its integration into well designed urban precincts. Early planning can support a range of more sustainable transport options as well as a more adaptive infrastructure that can respond to changing community preferences and needs.

3. A Strong Economy Built on a Smarter, Cleaner, Regenerative Future

An economy's strength is measured by its performance across three fundamental factors: namely productivity, population, and participation.

A highly productive economy will be one that sustainably maximises the throughput generated by its most scarce and valuable resources. These resources are land, capital, and people. Land is inherently scarce, and so policy governing its intelligent and productive use merits particular attention to ensuring the State's economic growth over the next 30 years.

As previously noted, South Australia was recently rated as having the most competitive business tax and planning regime in the nation according to the Business Council of Australia. The efficiency of the planning system and sophistication of the policy that governs its operation are integral to the State's investment attractiveness and growth prospects.

The GARP can play an active role in shaping how land use influences future investment, talent, employment, trade, infrastructure, health, education, energy, and sustainability outcomes to name but a few.

The discussion paper notes digitisation, decentralisation, automation and advanced manufacturing, workforce, skills and migration and changing mobility systems as key trends and drivers.

Members of the Property Council in South Australia propose that the GARP should optimise land use, balancing these factors and a number of other considerations.

A modern sophisticated economy necessitates well situated land that can cater for the business requirements of distribution centres, manufacturing, industrial, logistics and warehousing facilities.

It is vital that the GARP incorporates land use planning that enables a diverse economy characterised by multiple resilient and future proofed industries.

The Property Council advocates that the Greater Adelaide Regional Plan:

Is flexible and provides choice, allowing for a diversity of commercial uses that can enable Greater Adelaide to attract and maintain its skills base.

A smart economy requires smart people.

The 'brain drain' phenomenon in South Australia is well known.

The South Australian Government has embarked upon a policy trajectory that seeks to reverse this trend by increasing the capacity of the State's economy to engage in increasingly complex economic activities and grow the number of local high paying jobs to retain talent.

This is underpinned by the government's investment in education and engagement with transformative endeavours such as the university merger, AUKUS and the hydrogen industry.

Key points:

1. **Create a clear vision.**
   A vision for Greater Adelaide that accounts for how land will be intelligently utilised to attract and retain highly productive, highly skilled people to contribute to our economy is worthy of deep consideration.

2. **Attract workers through quality working environments.**
   Complex industries will increasingly seek to attract talented cohorts of people by offering high-amenity employment space. This is true not only in the office market but in the kinds of industries that occupy land outside the CBD.

   As traditional blue collar working environments integrate technologies that improve productivity and require a more sophisticated workforce to compete, employees will increasingly demand higher degrees of amenity with infrastructure and services that entice them to participate in these jobs.

3. **Provide strategic employment land that's connected to a diverse housing offering.**
   Land designated for strategic employment needs to be situated in relative proximity or with ample, frequent, and rapid connectivity to a diversity of housing options (including high and medium density, build-to-rent, student accommodation and retirement living) that can accommodate a critical mass of population providing the human capital required to drive a range of industries.

4. **Establish mixed use employment precincts.**
   The needs of employees regarding services and amenities are important. Mixed use precincts that improve employee experience are attractive to companies who want to compete to acquire highly skilled people and retain them.

Preserve scarce land such as 'last mile space' and land connected to transport infrastructure.

The pandemic reinforced the essential nature of "last mile space".

Last mile space refers to storage and warehousing facilities in or near CBD's and town centres.

With consumer behaviour during Covid necessitating a rapid expansion in online shopping, traditional supply chains across Australia came under immense pressure. Storage facilities close to large urban populations became increasingly vital to ensure a continuity of supply.

Key Points

1. **Protect land for last mile logistics.**
   Members who act in the industrial market report that there is a trend by more and more companies towards operating sites that are more numerous but smaller in size. These companies seek a competitive advantage by being able to replenish stock more rapidly by holding inventory closer to the point of sale ensuring supply chain resilience and maintaining customer loyalty. Due to the current housing crisis, high quality urban infill sites, are naturally of important strategic value. However, last mile space that is well situated is difficult to replace once it is converted into residential thus making its preservation highly important. Not only does this have economic benefits, but it has positive sustainability outcomes with reduced heavy vehicle movements in urban centres.

2. **Identify and protect land close to Airports and key freight infrastructure.**
   Good quality land that is well connected to key infrastructure such as the airport is highly valued. This provides companies with domestic and international air freight requirements significantly lower transportation costs.

   It is worth noting that Property Councils 2022 election platform outlined that the UK Airport Commission found that a 10 per cent increase in seat capacity (proxy for connectivity) increased short-term GDP by 1 per cent., product exports by 3.3 per cent and foreign direct investment inflows by 4.7 per cent.

Drive policy that enables robust forward planning and delivery mechanisms for provision of strategic employment lands.

Long-term planning for economic growth is critical, and understanding market trends and demand for land must be a clear focus of the GARP.

Key Points

1. **Orderly and transparent process for the delivery of development ready land**
   The State Government has recently appointed a Housing Infrastructure Planning and Development Unit to work across government agencies, council, and utilities to ensure the right infrastructure and services is in place to support the housing.

   The Property Council would assert that to accelerate and boost employment a similar, properly resourced unit should be established with regards to employment land. This unit should have powers to monitor land use, investigate requirements and coordinate government agency inputs to ensure sites are brought to a state of development readiness.

2. **Curate market led industrial and employment precinct requirements.**
   Understanding the land requirements of the industries the government desires to attract is critical. An intimate knowledge of the requirements and priorities of business in respect of issues such as proximity to transport infrastructure, energy use, customers and suppliers is important to building a high-resolution image of the land requirements desirable for Greater Adelaide's future economy.

   It is critical to ensure industry is engaged to understand the dynamic nature of employment precinct requirements and to ensure decision-making is evidence based. A granular evidence and data driven solution to understand land availability for employment space is encouraged so that Government and the private sector can collaborate.

3. **Provide flexibility to enable new businesses to thrive and diversify over time.**
   Employment land demand is less predictable than residential land supply. The Property Council would counsel against prescriptive policy that puts the brakes on innovation and ensure that continuous change in local and global conditions is considered as part of a resilient forward focused planning system.

4. A Greater Choice of Housing in the Right Places

With projections forecasting Greater Adelaide's population growing by up to 670,000 people over the next 30 years, decisions informing where and how we should grow our housing requires bold decision-making geared towards strengthening the liveability, sustainability, and economic prosperity of the region. Growing diversity in housing stock - with a holistic vision informing its placement - will be integral to enhancing the State's growth and liveability over the next 30 years.

In 2023, Adelaide surged up The Economist's Global Liveability Index, catapulting from the 30th position to the 12th, making it one of the world's most desirable cities to live in. To maintain and further improve this ranking, it is essential that South Australia continues to be an affordable and desirable place to live and work in Australia.

Members of the Property Council in South Australia advocate for GARP initiatives that will strengthen Adelaide's liveability brand by presenting a bold and comprehensive vision for the state's growth and positioning both locally and globally. This plan should encompass the promotion of intelligent diversity in market-lead housing typologies, offering choices for residents at every stage of life. Additionally, it should provide a holistic vision for optimizing land use, striking a balance between creating world-leading living environments and fostering opportunities for economic growth that support them.

The Property Council advocates that the Greater Adelaide Regional Plan:

Promotes growth of the City Centre

The opportunity remains to fulfill Adelaide's internationally acclaimed urban plan, strengthening the city's growth potential and reinforcing its reputation as a liveable, dynamic, and vibrant urban environment through an increased focus on infill development. To invigorate Adelaide's urban core and enhance its vibrancy, it is imperative to prioritize and incentivize higher density living within and around the city centre. This approach aligns with the spirit of our renowned city plan, consolidating critical mass in our vibrant "Festival State" core.

A true city in a park - Adelaide stands as the world's sole city enveloped by Park Lands. It is a place that can be easily experienced and explored by virtue of its grid-like plan of wide streets, terraces, and public squares. Internationally recognised as one of the most important influences on the Garden City Planning movement, Adelaide's untapped potential continues to offer an ideal canvas for shaping the city of tomorrow through increased population and density which the city can support. The abundance of existing social infrastructure and amenities can pave the way for a city that combines a strong sense of place and sustainable urban development, with well-being at its core.

As indicated in the plan, the 'Adelaide' sub-region has contributed only 10% (13,131) of the greater region's population growth distribution from 2011 to 2021. To bolster this figure, the plan should boldly advocate for a more significant portion of our state's growth to occur in Adelaide's city centre, where distinctive liveability characteristics have already been established. Achieving this requires a balanced approach that identifies future residential growth areas while placing equal emphasis on urban expansion and strategic higher-density urban infill.

Addressing the planning challenges that come with this endeavour, such as airport building height restrictions, adaptive reuse of heritage buildings, and activating ground floor spaces, is crucial to unlock the city centre's growth potential. Whether it's for student housing, essential workers' accommodation, apartment living, heritage building preservation, or office space conversion, city developments must be both attractive and affordable, catering to a diverse range of residents. These strategies are key to unlocking Adelaide's full potential and securing its place as a world-class, liveable city.

Key Points

1. **Enhance Adelaide's brand through a clear vision.**
   Promoting growth in the city will bolster Adelaide's brand and support local and global initiatives, emphasizing liveability and our unique attributes, such as our vibrant festival scene in the continued effort to reverse Adelaide 'brain drain' and reach the upper limits of our population growth targets.

2. **Social equity.**
   Promote higher density living in the city areas grants more people access to established world-class amenities and social infrastructure such as our Park Lands, promoting social equity.

3. **Creating diverse living environments.**
   Encouraging higher density living around the core will lead to a more diverse living environment with critical mass, fostering vibrancy and community engagement.

4. **Leveraging existing infrastructure.**
   Adelaide's core is surrounded by ample infrastructure and amenities, including the Adelaide Park Lands. Leveraging these resources can lead to more sustainable and vibrant urban development.

Supports infill and missing middle housing typologies within inner and middle suburbs

The Property Council supports balancing the need for infill growth, with new developments on the fringe. To facilitate sustainable growth while ensuring housing availability and supply, we support the promotion of 'missing middle' housing typologies as a suitable form of infill development.

Given that 75% of homes in the region are detached dwellings, and with a 78% increase in single households since 1991, the strategy to promote missing middle housing typologies aligns with changing demographics and housing requirements outlined in the plan. At its core, this approach advocates for housing options that serve as a transitional bridge between low-density and high-density living. Missing middle housing comprises house-scale buildings with multiple units that are compatible in scale and form with detached single-family homes, all within a walkable neighbourhood. This approach not only preserves the appeal of mixed housing typologies but also ensures greater accessibility for all.

We understand that ad hoc infill development has created challenges within existing areas. However, care needs to be taken when reducing this form of housing supply without simultaneously releasing sufficient alternative housing options within the inner and middle ring suburbs of Adelaide. The current 'housing crises' is illustrative of our land supply not being ready to take up demand.

Key Points

1. **Support sustainable growth.**
   It is crucial to avoid repeating past mistakes of continuous low-density growth, which has adverse environmental impacts. Embracing a sustainable approach to growth is paramount.

2. **Understand our changing demographics.**
   The demographics and housing needs of our communities are evolving. To ensure efficiency and occupancy rates, we need a responsive housing strategy that fosters vibrant living communities while addressing affordability challenges.

3. **Unlocking land value to stimulate investment.**
   Encouraging 'missing middle' housing types can unlock greater land values, offering private industry incentives to invest in and deliver these diverse housing options. Supporting a market lead supply.

4. **Housing affordability as a mutual responsibility.**
   With compounding concerns around the cost of living, housing affordability serves as a crucial consideration in urban planning and policymaking. It ensures that housing is accessible and affordable for a broad range of income levels within our region. It is a mutual responsibility with the public and private sector working in collaboration. Care needs to be taken to ensure affordable housing policies are enabling rather than putting further constraints on land that is already challenging to bring to market.

5. **Providing housing choice.**
   Choice is a key enabler in providing people with the right form of housing throughout different life stages. The 'missing middle' concept is vital because it enables the introduction of new housing types into well-established, well-serviced neighbourhood, fostering greater diversity in sought-after locations and offering housing options at a more affordable price point compared to the predominantly available housing stock.

Supports a balance of housing across all subregions and markets.

Our members include a range of development interests, from infill development to large scale development on the fringe. Recognizing this diversity, The Property Council places great importance on ensuring a well-balanced land supply throughout Greater Adelaide, thereby facilitating a myriad of lifestyle options for our community.

We advocate for a future urban form that incorporates a variety of development types, encompassing small-scale infill, strategic infill, expansion within the CBD around vital transit hubs, and greenfield growth on the periphery of existing urban areas.

Key points

1. **Sub-regional growth targets that support housing diversity.**
   Growth targets should be based on sub-regions, rather than the whole GARP area and include the full range of development typologies to provide residents with greater choice.

2. **Flexibility of land supply planning.**
   GARP should provide flexibility for development types to be responsive and adaptive to changes in market-driven demands.

Promote strategic infill development and renewal around existing mass transit and local community hubs.

Unlocking strategic infill sites will play a crucial role in ensuring that new developments align with affordability and sustainability objectives, all while addressing the evolving needs of our expanding community.

As identified within the plan, significant strategic infill sites at Lightsview, St Clair, West Lakes, Dock One and Glenside have integrated successfully with existing neighbourhoods. These master planned communities provide high amenity for residents in well located areas.

The Property Council endorses the necessity for additional sites like these throughout Adelaide.

Key Points

1. **Promote strategic infill growth.**
   Our members support strategic infill sites around the Adelaide core as an ideal scenario for implementing the 'missing middle' approach through mixed use typologies. These sites can be strategically developed to enhance the city's liveability. However, care needs to be taken in creating further barriers to such development e.g., increased parking rates, lowered building heights due to community resistance, site contamination requirements and other policy barriers.

DTI:PlanSA Submissions

From: Prospect Residents Association <[redacted]>
Sent: Thursday, 2 November 2023 10:18 PM
To: DTI:PlanSA Submissions
Subject: Submission Greater Adelaide Regional Plan Discussion Paper
Attachments: Submission re GARG report.pdf

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

Please find attached the Prospect Residents Association on the Greater Adelaide Regional Plan Discussion Paper.

Lizzie
Elizabeth Crisp
President
Prospect Residents Association
[redacted]
www.prospectresidentsassoc.org
Facebook: https://bit.ly/2Lt8jjI

Prospect Resident Association Inc.

ABN 18600859844.
Registered No. 12864M

PO Box 287, Prospect,
South Australia 5082
prospect.residents.assoc@gmail.com
Facebook: https://bit.ly/2Lt8jjl
https://www.prospectresidentsassoc.org/
25 Oct 2023

Prospect Residents Association comments on the

THE GREATER ADELAIDE REGIONAL PLAN

General comments

The Prospect Residents Association supports the concepts put forward by the National Trust 50-year plan for metropolitan Adelaide in 2021 written by Professor Norman Etherington. This plan talks about using the rail network for planning for future population expansion or even population shrinkage concentrating around the rail network rather than around major roads. The basis of this plan is that rail networks have a greater capacity to transport a greater number of people at greater speed thus easing congestion on our roads and with less pollution now that the rail networks have been electrified. It also avoids destroying our historic and character inner suburbs and avoids haphazard development as has been currently occurring with over development in many inappropriate sites. It would require a change of focus by the State Planning Commission and the State government over the next 50 years. Those of us already experiencing the horrors of infill development are already caught up in terrible loss of amenity often in narrow streets that do not have the capacity to take the infill development.

We are in agreement with the City of Prospect Council report that this report focuses on housing growth without considering the impact of climate change, the circular economy and other broader issues eg developers taking advantage of a loose planning system with poor to no consequences for breeches of planning approvals and sloppy builds.

We also agree with the City of Prospect Council that we do not support a historic conservation zone/ heritage area on Fitzroy Tce Prospect being rezoned as Urban corridor. This would completely destroy this area of heritage in Prospect.

We do not support the Collinswood activity centre being rezoned urban corridor. This small shopping centre supports living locally but is surrounded by infill development with streets already struggling with too much traffic and parking with all the down side of infill in full force. (see the topic **The negative side of Infill development**). When development applications are

Prospect Resident Association Inc.

PO Box 287, Prospect,
South Australia 5082
prospect.residents.assoc@gmail.com
Facebook: https://bit.ly/2Lt8jjl
https://www.prospectresidentsassoc.org/
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ABN 18600859844.
Registered No. 12864M

made for infill in the inner suburbs there needs to be much better assessment of capacity of narrow streets for traffic and parking to relieve stress and safety issues. People are not going to give up their cars and stop visiting family and friends so car use needs much better planning and assessment.

Who to blame for the current housing crisis.

Currently it seems the people to blame for the housing crisis are single people in housing and couples without children.

This is completely fallacious. It is our view that the housing crisis has arisen from long term government's lack of planning and financial support for social housing and developers disinterest in building affordable housing. The developer's disinterest in affordable housing can be seen from the number of multi-storey buildings that have not included the percentage of affordable apartments that they have been required to include. In addition the lack of government funding to the various forms of Housing SA resulting in housing has been sold off and not replaced. This has been compounded by the lack of consequences to the development industry for not complying with this requirement. The lack of consequences for noncomplying development needs to change.

The lack of funding to Housing SA has probably been the single biggest reduction in social housing. Giving some money to Community housing has not made up for the short fall now in existence.

The housing crisis has been compounded by the introduction of Air B&B's where rental properties have been taken off the market and allowed to charge what they like to customers and make significant profits. This has been allowed to flourish with no thought about whether this is being managed properly by government policy or whether in fact this is a commercial enterprise in our residential streets.

This has been further exacerbated by foreign investors buying into the residential markets and inflating the cost of housing for South Australian residents. Foreign investment like this should be banned.

The negative side of infill development

The negative side of infill development includes

- People are put off walking from the state of footpaths and the clutter from having

Prospect Resident Association Inc.

PO Box 287, Prospect,
South Australia 5082
prospect.residents.assoc@gmail.com
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cyclists and scooters on footpaths.

- Increasing noise and compatibility issues as young people are thrust next to older and old and sick people and wanting to play loud thumping music, drink and take drugs just meters from a large number of households who experience significant stress and mental anguish from this lack of consideration.
- Congestion in streets from increased speeding traffic, to constant parking issues, to residents struggling to get out of their drives, due to out of date parking regulations creating these problems of congestion with parking and lack of parking spaces on streets.
- Increased neighbourhood conflict and aggression as a result of the problems listed.
- Unrealistic expectations that people will give up their cars and not want to visit friends and family and will develop friendships with people just because they live near them with whom they often have little in common.
- Poor public transport, removal of bus stations, inconsistent transport services.
- Over taxing on old street infrastructure such that the sewerage system blocks or power failures increase as transformers struggle to boost power flows.
- Increased wear and tear on roads creating pot holes due to increase in traffic flows down narrow streets.
- Constantly changing neighbours with Air B&B and rental properties.
- Loss of privacy and quiet times.
- Significant loss of trees and vegetation and the creation of streets with an increase in the heat bank affect which is exacerbated by people being allowed to build entirely unsuitable housing in these streets eg black brick housing and housing with dark roofs and cheap unsustainable housing.

What concerns us about the current report out for consultation.

1. It focuses on the road network rather than the rail network. The rail network has a much greater potential to get cars off the road and reduce congestion. The rail network, if utilized and developed strategically, has the potential to move people quickly as road crossings are reduced and hold ups removed. It has the potential to transport people over long distances. The potential here is a reduction of noise and petrol pollution as trains are electrified.

   We agree with the National Trust 50-year plan that the government should be buying up old industrial sites along the rail net work and looking into how to utilize and develop this

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potentially superior form of travel. These sites would be more able to be developed n as greenfield sites where climate change, sustainability of build, plus open space and recreational areas could be included.

2. We have significant concerns with the future plan to build on more of our agricultural land and believe this to be a very dangerous plan. If food is not grown locally then transport costs increase or we have to rely on imported food with more concern about the irradiation of our food supply. This affects cost, quality and health.

3. The main concern with greenfield sites is when the infrastructure is not managed well or left to last. Greenfields sites are better able to be master planned but need to take into account more sustainable development and not be allowed to use products that contribute to the heat bank affect and climate change e.g. black or dark brick and dark roofs. They can also be designed to help the focus of living locally when transport is well developed close to where they live eg if along the railway network.

4. The main drawback with the development of greenfield sites is when the developer develops the plan, it is given the tick and flick and then the developer does not follow the approved plan and leaves aspects out eg infrastructure or greening. There needs to be greater control around these plans to stop shoddy developments as can be seen on the Prospect urban corridors, at Mount Barker where roads don't meet or where suburbs are difficult to get in and out of, where housing is too close and there is lack of greening and bushfire concerns.

5. **Where is the next generation of strategic infill sites**

   Along the railway line with plans to improve and increase places serviced by trains. Linear development instead of radial development of Adelaide.

6. **What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbour, Goolwa and Rosewater?**

   The most important issues to consider if you want to grow these satellite cities is how to link them into the rail network and how not to build on our agricultural land.

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With Murray Bridge you must make sure any decision supports the work on regreening Frahns Farm by Bio-R which is working to replant lost vegetation to avoid major extinction of significant bird populations.

Perhaps these locations being semi-rural could find land/sites for tiny houses. More people are interested in tiny houses and granny flats which is more affordable but often require land around them to make them work ie the ability to be able to spill out into the open from small spaces.

7. **How can infill development achieve an urban form that is consistent with the principles of living locally?**
    - Better planning
    - Better greening
    - More quiet open spaces
    - Developers need to be held to account. Council needs to be able to issue **significant** fines for developers who breech the conditions of their approval given it is so expensive to take them to court and councils often do not have the money to do this.
    - Developers **must** adhere to the rules rather than **should.** Rules are too rubbery and developers should not be able to breech height limits and continually go back for variations to plans.
    - Better consideration of disability issues.
    - Protection of character homes and historic places
    - No permission to demolish homes until a plan for the rebuild has been approved.
    - Not cramming too many houses together so the problems occur as described in topic the **Negative Side of infill development** on page 2 of this report.

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

Those of us living in residential streets with infill developments do not experience many if any benefits. You need to talk to the people living in infill on main roads to find out what they see as the benefits.

Unless you manage some of the key issues that occur with infill development in inner city locations you will continue to damage support for it. For example, when residents who pay rates lose the ability to

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safely access their driveways because streets are clogged with parking and traffic issues, and renters for example, park too close to driveways blocking access to driveways infill will not be supported.

Anyway, we feel that it is more important to focus infill on the rail network to get better transport outcomes and reduce congestion and car use on main roads and freeways.

9. **What are the most important factors for the commission to consider in meeting future demand for open space?**
    - Stop building on the parklands and support Lights special vision for Adelaide.
    - Stop cluttering our open space and make sure there are quiet reflective open spaces.
    - Stop allowing so many trees to be destroyed. Developers need to be held to account for the unnecessary destruction of trees.

The following gives an outline of what we support by quoting key aspects from the National Trust report/50 year plan.

In a warming world there must be no new developments in sites threatened by rising seas, fires or Flood.[1]

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.....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.[2]

Adelaide's urban rail network is an extraordinary legacy from a previous era of economic growth. It is a grossly under-appreciated asset.[3] It should never be privatized.

How we make use of that asset depends a lot on the size of the population it serves. That has been the subject of fierce debate.[4]

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[1] A 50-year plan for Metropolitan Adelaide Prof Norman Etherington AM 2021 p 7
[2] Ibid, p 12
[3] Ibid, p 13
[4] Ibid, p 13

Prospect Resident Association Inc.

PO Box 287, Prospect,
South Australia 5082
prospect.residents.assoc@gmail.com
Facebook: https://bit.ly/2Lt8jjl
https://www.prospectresidentsassoc.org/
25 Oct 2023

ABN 18600859844.
Registered No. 12864M

The high growth model poses the biggest challenges to liveability, planning and infrastructure.[5]

The National Trust report poses the question "what if the growth does not happen and the metropolitan population remains static or gradually declines?[6]

A 50-year plan needs to be more than wishful thinking. It has to deal with all three possibilities: high growth, no growth and shrinkage.[7]

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 to Mascot Airport will exceed that of Manhattan and Hong Kong[8]

That means concentrating all high density new residential building within easy walking distance of train and tram stations.[9]

Private developers will always seek to plant their towers in established neighbourhoods with high property values, tree-lined streets and handsome old buildings..... 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.[10]

In other Australian cities proximity to good public transport raises property values.[11]

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.... urban consolidation..... The pitfalls of the (this) policy were comprehensively detailed by Patrick Troys 1996 book, *The Perils of Urban Consolidation.*[12]

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[5] Ibid, p 14
[6] Ibid, p 14
[7] Ibid, p 14
[8] Ibid, p 16
[9] Ibid, p 16
[10] Ibid, p 16
[11] Ibid, p 16
[12] Ibid, p 17

Prospect Resident Association Inc.

PO Box 287, Prospect,
South Australia 5082
prospect.residents.assoc@gmail.com
Facebook: https://bit.ly/2Lt8jjl
https://www.prospectresidentsassoc.org/
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ABN 18600859844.
Registered No. 12864M

Relaxation of planning controls in the city centre and adjacent suburbs (has) delivered none of the proposed benefits. Developers, it turned out, did not want (have not wanted) to increase population density of affordable housing through medium and high rise building..... They want (ed) to build very expensive large apartments and units for cashed up buyers who coveted the lifestyle of the wealthier suburbs.... The specious arguments of the urban consolidators threatened to bulldoze irreplaceable heritage of colonial and federation domestic architecture for no good reason. (This is currently happening at an alarming rate)

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.[13]

Without rapid transport, most of these suburbs (middle and outer) will remain car dependent (even if the cars are not personally owned or driven).[14]

No growth

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. [15]

Shrinkage

Examples around the globe demonstrate that shrinkage happens. At National level Italy and Japan and other developed countries will lose people over the next fifty years.[16]

The city of Leipzig in Germany provides an example of how good planning can manage decline.

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.[17]

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[13] Ibid, p 17
[14] Ibid, p 17
[15] Ibid, p 18
[16] Ibid, p 18

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ABN 18600859844.
Registered No. 12864M

PO Box 287, Prospect,
South Australia 5082
prospect.residents.assoc@gmail.com
Facebook: https://bit.ly/2Lt8jjl
https://www.prospectresidentsassoc.org/
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The greater the likelihood of population decline, the greater is the necessity for historic conservation.

When population shrinks planning rules can provide more certainly 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.[18] 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.[19]

Because we cannot know precisely how the city will develop over the next fifty years, we must hang onto all our irreplaceable assets.

[redacted]

Elizabeth Crisp
President
Prospect Resident's Association
C/- Box 287
Prospect
SA 5082
prospect.residents.assoc@gmail.com
Facebook: https://bit.ly/2Lt8jjl
[redacted]

[17] Ibid, p 19
[18] Ibid, p 19
[19] Ibid, p 20g

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From: Cathy Cochrane [redacted]
Sent: Monday, 6 November 2023 4:38 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: JFA Purple Orange Submission State Planning Commission Greater Adelaide Regional Plan.pdf

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Good afternoon
I sincerely apologise if you also received this via the website form, however it appeared to time out, so to be safe I'm emailing a copy as well.
Many thanks!
Kind regards
Cathy

Cathy Cochrane | Senior Policy Leader

Purple Orange

104 Greenhill Road UNLEY SA 5061
[redacted] **w** | www.purpleorange.org.au

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Submission to the State Planning Commission about the Greater Adelaide Regional Plan

6 November 2023

About the Submitter

JFA Purple Orange is an independent social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people living with disability and their families.

Our work is characterised by co-design and co-production and includes hosting a number of user-led initiatives.

Much of our work involves connecting people living with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially about policy and practice that helps ensure people living with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called *Citizenhood*.

JFA Purple Orange
104 Greenhill Road
Unley SA 5061 AUSTRALIA

Telephone: + 61 (8) 8373 8333
Fax: + 61 (8) 8373 8373
Email: admin@purpleorange.org.au
Website: www.purpleorange.org.au
Facebook: www.facebook.com/jfapurpleorange

Contributors

Cathy Cochrane, Policy and Research Leader

James Murphy, Policy and Research Officer

Selena Maddeford, Manager – Policy and Projects

Robbi Williams, CEO

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1. Summary and recommendations

The Greater Adelaide Regional Plan (GARP) is an important opportunity to shape a future that ensures all people have access to an accessible, affordable, and safe place to call home situated within a community that is welcoming, inclusive, and accessible to everyone. Diversity is a great strength of our communities, and it is essential we take every possible step to ensure everyone can participate equally in the social, cultural, and economic life of our society. This cannot be taken for granted; it requires proactive planning and intentional actions to ensure our neighbourhoods and communities are designed to maximise inclusion and opportunities for each person to take up active valued roles in their community. The GARP must set outcomes and targets to increase the supply of accessible housing and to only invest in community infrastructure that is inclusive and accessible for everyone. The GARP should also identify existing gaps in outcomes and commit to priority actions to overcome these. To ensure there is ongoing accountability for change, five-yearly independent evaluations should occur and be publicly reported.

We recommend:

Recommendation 1: The Greater Adelaide Regional Plan (GARP) should draw on the Model of Citizenhood Support in articulating a new vision for how the Greater Adelaide community grows and evolves over the next 30 years, and as a useful lens through which to grapple with the range of complex issues the plan must address.

Recommendation 2: The Greater Adelaide Regional Plan (GARP) should identify existing unmet needs within the Greater Adelaide region and articulate targeted actions and investments to address these within the formulation of how the Greater Adelaide region should grow. A framework that identifies a set of priorities to fix existing gaps should be considered alongside generalised outcomes.

Recommendation 3: The Greater Adelaide Regional Plan (GARP) should recognise people living with disability as valuable and equal members of Greater Adelaide region communities and reflect and promote the Social Model of Disability.

Recommendation 4: The Greater Adelaide Regional Plan (GARP) should recognise Australia's obligations under the United Nations Convention on the Rights of Persons with

Disabilities (UNCRPD), among other human rights obligations, and ensure these rights are upheld and promoted.

Recommendation 5: The Greater Adelaide Regional Plan (GARP) should align with *Australia's Disability Strategy 2021-2031* and the South Australian State Disability Inclusion Plan, known as *Inclusive SA*, and work in a complementary manner to fulfil all the commitments therein.

Recommendation 6: The Greater Adelaide Regional Plan (GARP) should identify gaps in processes and barriers for planning and implementation regarding how to ensure growth locations are inclusive of, and accessible to, all members of the Greater Adelaide region community. This should be central to the formulation of principles to guide where Greater Adelaide should grow. A framework that identifies a set of priorities to fix existing shortcomings should be considered alongside generalised outcomes.

Recommendation 7: The State Planning Commission should ensure it undertakes a genuine co-design process to design and implement the Greater Adelaide Regional Plan (GARP). It should engage with a range of cohorts, including people living with disability, to ensure the plan reflects diverse needs and will be fit-for-purpose to ensure it delivers what communities need over the next 30 years.

Recommendation 8: The State Planning Commission should conduct further open public consultation on the draft Greater Adelaide Regional Plan (GARP) once it is formulated.

Recommendation 9: The Greater Adelaide Regional Plan (GARP) should set out meaningful, timebound, and measurable targets to ensure there is accountability for delivering on its commitments. An independent evaluation of progress toward outcomes should occur every five years with the results publicly reported.

Recommendation 10: The Greater Adelaide Regional Plan (GARP) should articulate a vision whereby all people have access to a place they can authentically call *home*. It should underscore that this principle applies equally to all people living with disability, not just non-disabled people.

Recommendation 11: The Greater Adelaide Regional Plan (GARP) should include an outcome regarding housing choice for everyone and priority actions to address the existing absence of choice for many people living with disability.

Recommendation 12: The Greater Adelaide Regional Plan (GARP) should include an outcome and associated targets to increase the supply of accessible dwellings in the region, including for both private market and social housing.

Recommendation 13: The Greater Adelaide Regional Plan (GARP) should include a target that measures the number of dwellings built that fully comply with the National Construction Code (NCC) 2022 Livable Housing Design (LHD) Standard, those that partially comply due to an exemption, or those that do not comply at all as a result of 'blanket' exemptions, including for both private market and social housing. This will enable better monitoring of supply, help identify any issues encountered in the implementation, and ensure the housing industry and governments are accountable for delivering genuine change.

Recommendation 14: The Greater Adelaide Regional Plan (GARP) should include a target that all dwellings are built to high level accessibility standards within 20 years. To support this outcome, it should promote the benefits of accessibility and include a target to measure the number of dwellings built to levels of accessibility that exceed mandatory compliance, for both private market and social housing.

Recommendation 15: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a Planning and Design Code Amendment to create an Accessible Housing Overlay as soon as possible (for example, see Appendix A).

Recommendation 16: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a review of all planning rules and regulations and how they impede the goal of increasing the supply of accessible livable housing in the Greater Adelaide region.

Recommendation 17: The Greater Adelaide Regional Plan (GARP) should clearly define the characteristics of the style of neighbourhoods it seeks to build and identify the key elements of planning, design, and construction that will produce this outcome. It should

focus on how Greater Adelaide grows in ways that create and enhance inclusion, connectedness, neighbourliness, and a genuine sense of welcome.

Recommendation 18: The Greater Adelaide Regional Plan (GARP) should recognise the impact of negative attitudes, stigma, and stereotypes for people living with disability and include actions to breakdown these barriers, including by addressing the need to plan, design, and develop in ways that will facilitate interactions and connections between people in neighbourhoods.

Recommendation 19: The Greater Adelaide Regional Plan (GARP) should recognise and reinforce the important role neighbourhoods and communities that are planned, designed, and built for inclusion and connection can play in creating mutual natural safeguards between people, especially those experiencing isolation and disconnection.

Recommendation 20: The Greater Adelaide Regional Plan (GARP) should include actions and outcomes regarding funding small seed grants or similar for local grassroots projects in support of inclusive connected neighbourhoods and communities.

Recommendation 21: The Greater Adelaide Regional Plan (GARP) should elevate the essential role of community places and spaces in addition to land for houses and jobs. Community places and spaces should be part of every development plan and design for where Greater Adelaide should grow.

Recommendation 22: The Greater Adelaide Regional Plan (GARP) should emphasise the impact of every step of the planning process on final outcomes and ensure that planning for accessibility is a priority action under the plan.

Recommendation 23: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets that ensure all investment is directed to community infrastructure that is genuinely accessible to, and inclusive of, everyone. It should explicitly rule out investment in segregated provisions in any form.

Recommendation 24: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of public transport services and infrastructure across Greater Adelaide. It should also identify priority actions to fix existing gaps through a comprehensive audit that sets a baseline for progress.

Recommendation 25: The Greater Adelaide Regional Plan (GARP) should endorse the provision of Inclusive Education in all schools and specifically rule out the establishment of new segregated education provisions anywhere in the Greater Adelaide region effective immediately. This must preclude any new 'special' schools, units, programs, or similar.

Recommendation 26: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of health infrastructure across Greater Adelaide.

Recommendation 27: The Greater Adelaide Regional Plan (GARP) should promote the roll out of Changing Places facilities and include a measure to track progress.

Recommendation 28: The Greater Adelaide Regional Plan (GARP) should adopt an expansive vision of the public realm and recognise the critical importance of making green spaces accessible to everyone.

Recommendation 29: The Greater Adelaide Regional Plan (GARP) should make accessible emergency infrastructure, procedures, and information provision a top priority and include an outcome and targets to achieve this.

Recommendation 30: The Greater Adelaide Regional Plan (GARP) should commit to an action that requires the co-designing and implementation of a simple framework, definitions, and standards for the provision of information about the accessibility status of places and spaces that can be used by governments, businesses, organisations, and others to communicate clear consistent information to the public.

2. Introduction

JFA Purple Orange is grateful for the opportunity to provide this submission to the State Planning Commission regarding the development of the Greater Adelaide Regional Plan (GARP).

We welcome the opportunity to apply a long-term lens to how the Greater Adelaide region should evolve to meet the needs of its growing and changing population over the next 30 years. The recognition of the importance of planning for the future to better address the myriad of problems the region faces – from climate change to the housing crisis – is fundamental to improving outcomes. Yet, while the consequences of many of these problems will be felt across the whole population, it is essential the disproportionate impacts on those with existing unmet needs and ongoing experiences of exclusion be prioritised in the GARP.

Many people living with disability continue to be excluded from full participation in community life in the Greater Adelaide region. There is a shortage of accessible housing available, and many are forced to live in shared arrangements, including in group houses,[1] without choice of where they live, who they live with, or who enters the property. The surrounding community amenities and social infrastructure are still inaccessible with poorly maintained footpaths, steps, and other physical barriers, preventing access to essential services and opportunities for social participation. The experience of living in a neighbourhood is often characterised by exclusion, disconnection, and isolation. Many of the experiences highlighted in the 2009 *Shut Out* report, including in the excerpt below, are unchanged after years of unkept promises and a lack of investment in change:

> *People with disabilities may be present in the community but most do not enjoy full participation in it. Discrimination and exclusion are frustrating features of daily life. People in wheelchairs cannot access the public facilities taken for granted by others in the community, such as playgrounds, swimming pools, cinemas, restaurants, hotels and cafes. Children with*

[1] In their character and effect, group houses are service facilities, not homes. This is why we deliberately use the term 'group houses' rather than the more common 'group homes'. The use of 'home' in this context is a misnomer and profoundly compromises its true meaning.

> *disabilities find themselves excluded from local kindergartens and schools... People with mobility aids have difficulty regularly accessing public transport. People with various disabilities are unable to access the aids, equipment and technology essential to their daily functioning, and are unable to access the support required to get them out of bed in the morning… People with disabilities feel forgotten.*[2]

It is a sobering reality. The task of driving change should not be left to people living with disability; it is everyone's responsibility. The GARP must play its part in setting out an agenda for change and identify relevant targets that will ensure accountability for delivering results.

The Discussion Paper for this consultation focuses on two key questions: how should Greater Adelaide grow and where should Greater Adelaide grow? Later in this introduction, we briefly respond to the proposed outcomes for how Greater Adelaide grows and the principles to guide where this occurs and highlight the gaps that we believe need to be addressed. We also emphasise the importance of co-design, both in formulating the GARP and in implementing it over the short, medium, and long term, as well as the crucial importance of tracking progress in line with clear interim milestones.

Then, in the following substantive parts of this submission, we focus on three critical topics that are largely overlooked in the Discussion Paper and its proposed outcomes and guiding principles: delivering housing outcomes that are accessible, affordable, and suitable for all members of the Greater Adelaide community; creating inclusive welcoming neighbourhoods and communities for the benefit of all; and ensuring communities are accessible to everyone. The recommendations provided throughout this submission are designed to make a constructive contribution to broadening the perspectives brought to the analysis of issues to be addressed in the GARP and to thereby strengthen the resulting plan to ensure it is as comprehensive, inclusive, and robust as possible.

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[2] Australian Government, 'Shut Out: The Experience of People with Disabilities and their Families in Australia', 2009, p.52, available at https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/shut-out-the-experience-of-people-with-disabilities-and-their-families-in-australia.

Our organisation's work is informed by a model called *Citizenhood*. We believe this model offers a valuable lens through which the Commission can consider all aspects of the GARP to ensure the resulting plan offers the best prospects of shaping an accessible, inclusive, sustainable, and prosperous future for the Greater Adelaide region. As such, the next section briefly introduces the Model of Citizenhood Support.[3] We encourage the Commission to access the full paper via our website.

2.1. Model of Citizenhood Support

The nature of our communities – from their design to their character to the atmosphere created – has significant implications for how people live and the availability of life chances. A good life for each person largely depends on the assets and opportunities available within their community. The Model of Citizenhood Support sets out a framework for how people can be supported to build their chances of a good life and maximise their *Citizenhood*. Secure appropriate housing, neighbourhoods that are inclusive and welcoming, and fully accessible community and social infrastructure are fundamental to a person's chance of living a good ordinary life and having meaningful valued roles in community life.

The Model provides a comprehensive contextual framework for organising policy and practice in support of people living with disability. Although it was developed with a focus on the life chances of people living with disability, it is also a highly relevant lens through which to approach policymaking regarding issues faced by other cohorts and, indeed, all aspects of the GARP. Hence, we urge the Commission to consider how this Model can usefully support its work.

The Model asserts that our life chances comprise four different, interrelated, types of assets we can call upon, termed the Four Capitals. These are: Personal Capital (how the person sees themself), Knowledge Capital (what the person knows and learns), Material Capital (money and the tangible things in our lives including a place to call home and access to community infrastructure), and Social Capital (having people in our lives whom we know and know us).

[3] R. Williams, 'Model of Citizenhood Support', 2nd edition, 2013, Julia Farr Association Inc, Unley, South Australia. See https://www.purpleorange.org.au/what-we-do/library-our-work/model-citizenhood-support.

These Capitals apply to any person and can reveal what types of investment and assistance might be helpful for someone to build a good life for themselves. It is worth noting that typically each of these assets is advanced when a person has access to safe, secure, accessible, affordable housing – and diminished significantly when a person experiences homelessness. Likewise, these assets are advanced by strong accessible communities that are inclusive and welcoming of all their members.

The concept of *Citizenhood* is not to be confused with the concept of Citizenship, which is a much narrower static construct typically referring to membership of a country.

Recommendation 1: The Greater Adelaide Regional Plan (GARP) should draw on the Model of Citizenhood Support in articulating a new vision for how the Greater Adelaide community grows and evolves over the next 30 years, and as a useful lens through which to grapple with the range of complex issues the plan must address.

2.2. Outcomes to guide how Greater Adelaide should grow

As noted above, the Discussion Paper raises two core questions. The first of these is how should Greater Adelaide grow? The Discussion Paper proposes the answer to this question be framed according to four desired outcomes to be achieved over the next 30 years. These are:

- 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

The themes identified in these statements are important although open to wide and varied interpretation. It seems fair to assume they identify where the intended emphasis lies even if it cannot be said they do not encompass other important objectives, such as accessibility and inclusion. Furthermore, this conceptualisation of generalised outcomes overlooks existing unmet needs within the Greater Adelaide community. Closing these gaps is likely to require targeted attention and investment, which may be better framed in the GARP as priorities for targeted actions and investments in addition to generalised outcome areas.

People living with disability currently have extensive unmet needs ranging from the shortage of suitable housing to the inaccessibility of most existing community infrastructure and their continued exclusion and segregation from community life, which are all largely absent from the Discussion Paper. We delve into each of these later in this submission. The Discussion Paper makes only one mention of 'disability' despite people living with disability making up 19.4 per cent of the South Australian population.[4] This oversight is reflective of how the experiences of people living with disability are often missed or disregarded in planning for our communities. Unfortunately, the one mention of 'disability' that is included in the Discussion Paper appears in relation to people living with disability being a group "facing 'deep and persistent' disadvantage,"[5] without providing any context, as if this can be taken as a given and applied to every person living with disability.

The Social Model of Disability recognises that disability results from the barriers, attitudes, and exclusion that people encounter as they navigate a society that has not been designed to include all its members. Importantly, people are not disabled by an impairment or difference, but by the world around them. It is essential the GARP reflects the Social Model of Disability and does not perpetuate outdated medical or charity approaches to disability that regard people as 'problems' to be fixed or unable to live meaningful contributing lives in communities. The process of deinstitutionalisation is still ongoing in Australia and the same is true in the Greater Adelaide region where many people are still subject to segregation, exclusion, and discrimination in all facets of life including housing, education, and employment. It is critically important that the GARP contributes positively to change and does not inadvertently advance the creation of a new generation of quasi-institutional discriminatory approaches, practices, and infrastructure designs.

Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), and it is important the GARP also reflects the obligations this bestows on all tiers of government.[6] The Discussion Paper only makes one reference to the rights of

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[4] Australian Bureau of Statistics (ABS), 'Disability, Ageing and Carers, Australia: Summary of Findings', 24 October 2019, available at https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release.
[5] See page 60 of the Discussion Paper.
[6] See further at https://humanrights.gov.au/our-work/disability-rights/united-nations-convention-rights-persons-disabilities-uncrpd.

people within the Greater Adelaide region, and this relates narrowly to landowners' land use rights.[7] It is essential the GARP and, in implementing it, governments, apply a much broader lens regarding human rights and ensure the UNCRPD, among other human rights obligations, is upheld and promoted. The UNCRPD covers many facets of life that are highly relevant to the GARP including, but not limited to, equality and non-discrimination (Article 5), accessibility (Article 9), living independently and being included in the community (Article 19), access to information (Article 21), and community participation (Article 30).

Australia's Disability Strategy 2021-2031 aligns with the obligations of governments to protect, promote, and realise the human rights of people living with disability. South Australia has committed to achieving a range of outcomes under this Strategy and the GARP should also reflect and align with these. In particular, the Strategy commits governments to leadership for the inclusion of all people living with disability; accessible housing and genuine housing choice; accessible built and natural environments; and full participation in the social, recreational, and cultural life of communities. Similarly, the GARP needs to align with the South Australian State Disability Inclusion Plan, known as *Inclusive SA*, which is currently under review with an updated version to be adopted next year.

Recommendation 2: The Greater Adelaide Regional Plan (GARP) should identify existing unmet needs within the Greater Adelaide region and articulate targeted actions and investments to address these within the formulation of how the Greater Adelaide region should grow. A framework that identifies a set of priorities to fix existing gaps should be considered alongside generalised outcomes.

Recommendation 3: The Greater Adelaide Regional Plan (GARP) should recognise people living with disability as valuable and equal members of Greater Adelaide region communities and reflect and promote the Social Model of Disability.

Recommendation 4: The Greater Adelaide Regional Plan (GARP) should recognise Australia's obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), among other human rights obligations, and ensure these rights are upheld and promoted.

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[7] See page 103 of the Discussion Paper.

Recommendation 5: The Greater Adelaide Regional Plan (GARP) should align with *Australia's Disability Strategy 2021-2031* and the South Australian State Disability Inclusion Plan, known as *Inclusive SA*, and work in a complementary manner to fulfil all the commitments therein.

2.3. Principles to guide where Greater Adelaide should grow

The second core question raised in the Discussion Paper is where Greater Adelaide should grow in order to support a significant population increase over the next 30 years. The Paper proposes seven principles to guide decision making about where this growth is located. These are:

1. We will plan for a high-growth scenario and stage the release of new land to meet the forecast demand of 300,000 dwellings by 2051.
2. Sub-regions will have their own distinct part to play in Greater Adelaide's future and each Local Government Area will have targets to accommodate growth.
3. Land supply beyond the planned future urban lands must take into consideration existing capacity of land that is available for development within the existing boundaries (defined by EFPAs [that is, Environment and Food Production Areas]).
4. Planning will accommodate rolling 15-year land supply targets for a range of land supply types.
5. The encroachment of urban areas on places of high primary production, landscape or environmental significance should be avoided.
6. To account for zoned land that may not become available for development due to landowner intention, an additional amount of land supply will be identified.
7. Identification and prioritisation of growth areas will be based on the transparency of costs to community (infrastructure provision, housing cost, ongoing living costs, climate change resilience costs) for differing forms of supply.

The considerations identified in these principles are important, but we believe there are significant gaps in the emphasis, if not the intent, of these parameters to guide decision making. The locations of communities, and the associated assets and opportunities that are contingent on this, have serious implications for what life is like for residents. Therefore, the

inclusiveness and accessibility of the neighbourhoods and communities in which housing and employment are located is critically important. It requires proactive planning; different adaptable strategies depending on whether the development is occurring on a greenfield site, within an existing inner or outer suburb, in a satellite city, or in a town; and a strong commitment to invest in the required accessible infrastructure and amenities.

To date, the planning, strategies, and investment undertaken have often fallen short of achieving the necessary outcomes and, therefore, the GARP should identify what gaps in processes and barriers to implementation are present so addressing these can be prioritised. The GARP is an opportunity to reflect on what has worked before and what has not, and can be an avenue to share these learnings to ensure continuous improvement. It must proactively seek to avoid repeats of past mistakes, as well as be realistic rather than aspirational. Growth locations should not be identified on the basis of an aspiration for a piece of infrastructure, such as a train line extension to an outer location in the region, if the necessary resources to make that a reality are not also allocated. Aspirations that will never be delivered are the enemy of good planning.

A focus on planning, development strategies, and investment to identify the most appropriate locations for, and support the quality of development in, growth areas also lead us to the consideration of the three critical topics we have already identified above, to which we devote the substantive parts of this submission. These are the need to increase the supply of housing that is accessible, affordable, and suitable for all members of the Greater Adelaide community; focus on creating inclusive welcoming neighbourhoods and communities for the benefit of all, and ensure communities are accessible to everyone.

Recommendation 6: The Greater Adelaide Regional Plan (GARP) should identify gaps in processes and barriers for planning and implementation regarding how to ensure growth locations are inclusive of, and accessible to, all members of the Greater Adelaide region community. This should be central to the formulation of principles to guide where Greater Adelaide should grow. A framework that identifies a set of priorities to fix existing shortcomings should be considered alongside generalised outcomes.

2.4. Co-designing the GARP and its implementation

In this submission, we highlight some of the key elements that we believe are essential if the GARP is to achieve meaningful results. However, we do not regard this contribution as anything more than a first step. For the GARP to truly reflect the issues and concerns of the Greater Adelaide community and to benefit from their lived experiences, insights, and ideas, we strongly believe the Commission should implement a comprehensive co-design process that genuinely engages people in the development, decision-making processes, and implementation of the plan. The co-design process should be designed to involve diverse representation from across the community including people living with disability. While running a consultation to enable people to have a voice is important, a greater emphasis on active participation and leadership from within the Greater Adelaide community will produce a better result.

Indeed, governments and government agencies should proactively consider how genuine co-design processes can enhance policy development across all areas of their work. While we often hear of agencies stating they have used a co-design approach, we are concerned that many of the processes governments are currently referring to as co-design fall well short of best practice and do not include active involvement in decision making. We encourage the Commission to access our Guide to Co-Design with People Living with Disability, [8] which was itself co-designed, via our website.

Additionally, we expect that, once formulated, the draft GARP will be presented again for further open public consultation and input.

Recommendation 7: The State Planning Commission should ensure it undertakes a genuine co-design process to design and implement the Greater Adelaide Regional Plan (GARP). It should engage with a range of cohorts, including people living with disability, to ensure the plan reflects diverse needs and will be fit-for-purpose to ensure it delivers what communities need over the next 30 years.

[8] View the Guide at https://purpleorange.org.au/application/files/7416/2510/1861/PO-CoDesign_Guide-Web-Accessible.pdf.

Recommendation 8: The State Planning Commission should conduct further open public consultation on the draft Greater Adelaide Regional Plan (GARP) once it is formulated.

2.5. Setting priorities and tracking progress

It is essential the GARP includes targets that are meaningful, timebound, and measurable to ensure there is accountability for outcomes. We note this plan will replace one initially prepared in 2010 and subsequently updated in 2018. We fully support ongoing reflection and evolution. Yet, one obvious downside is how this undermines the evaluation of results. We will never know exactly what the 30-year plan created in 2010 achieved over a 30-year span because it will be replaced before even reaching the half-way point of this term. This is not to suggest we disregard the importance of planning for the long-term or thinking about what the Greater Adelaide region will be like in 30 years' time. Rather, it highlights the need to set regular interim targets and evaluate progress at various intervals throughout the implementation of the GARP.

We suggest the GARP should include targets that are timebound for each five-year period within the 30-year timespan. At each of these junctures, a comprehensive independent assessment of progress should be conducted with the results publicly reported. A comprehensive review of the GARP itself could be conducted on a 10-yearly basis, at which point the span of the document could be extended for a further 10 years. Such an approach would ensure continuity and accountability are core features of the GARP.

We recognise that many desirable outcomes may not be easily measured, particularly if the Commission focuses on quantitative rather than qualitative results. This is true of some of the topics we raise in this submission. Therefore, it is likely that a GARP-specific evaluation design and associated data collection will be necessary. Actions to achieve this should be set out in the GARP.

Recommendation 9: The Greater Adelaide Regional Plan (GARP) should set out meaningful, timebound, and measurable targets to ensure there is accountability for delivering on its commitments. An independent evaluation of progress toward outcomes should occur every five years with the results publicly reported.

2.6. Note on language use

Choice of language is impactful yet can be difficult to navigate especially when words have multiple meanings or are in common usage in particular contexts and therefore act as a shortcut to a message being easily understood. Language and word use is also constantly evolving and changing. Nevertheless, we can all be mindful of the words we choose to use, what they might mean to diverse groups in the community, and whether there is a more inclusive alternative. Unfortunately, there are some examples in the Discussion Paper that would be best avoided. For example, as noted above, assigning 'disadvantage' to whole groups of people can be easily avoided with more nuanced expression. The use of shortcut terms like 'walkable' to imply the nature of an area can also be avoided (together with ableist connotations) and instead use language that directly conveys the intended meaning and features of the location, such as an accessible 15-minute neighbourhood. 'Living Locally' seems to be intended to create a shortcut term that implies numerous features of a community within Greater Adelaide but is also vague and open to broad interpretation. We would urge the Commission to choose its words carefully and to use clear direct language that is accessible to all while avoiding 'buzzwords'.

3. Focusing on housing outcomes that work for all people

While the current housing crisis is impacting all Australians, the impact is far greater for people living with disability who need both accessible and affordable housing options. The availability of accessible housing is extremely limited in the Greater Adelaide region, and many people are forced to wait for long periods of time to find suitable accommodation. Outdated institutional approaches to disability housing persist and, indeed, continue to be favoured by government agencies, with many people living with disability forced to reside in group houses with people they do not know and would not choose to live with. Others are stuck in inappropriate accommodation, including in hospitals long after their clinical needs have been met, due to no suitable alternatives being available. It is critically important that addressing the poorer housing outcomes for people living with disability be at the forefront of the Commission's approach to developing the GARP.

Rather than providing feedback structured around the proposals put forward in the Discussion Paper, we have elected to dedicate the three substantive parts of this submission to the critical elements that we believe are overlooked, or received insufficient attention, in the Paper. The first of these is the imperative that the GARP focuses on delivering housing that is *accessible* to all members of the community. Importantly, this is not to detract from the goals of genuine housing choice and well-located dwellings as identified in the proposed outcomes, both of which we endorse and will elaborate on further throughout this submission. Instead, it is to place a critical emphasis on the current severe shortage of accessible dwellings that must be overcome if the other proposed outcomes of the GARP are to be fully realised and if the right to suitable housing is to be met.

3.1. Providing genuine housing choice and a place to call *home*

Housing is a critical form of personal Material Capital and a key element of advancing people into lives of *Citizenhood*. It provides the base from which we access and build all our other Capitals. A *home* is more than just a shelter; it should be a place we can genuinely call 'home'; a place of comfort, rest, renewal, and belonging; where we are free to be ourselves, personalise our surroundings, and make decisions about who enters and on what terms.

Home is the foundation that allows us to live good ordinary lives, pursue our goals and interests, do things that give us meaning and purpose, build and maintain relationships with friends and loved ones, connect with our neighbours, and actively participate in our local communities. It is where we find a sense of safety, security, and certainty when we return at the end of our day. Home enables choice and control in our lives; upholds our individuality, self-determination, and status; and facilitates the use of our existing skills and the development of new ones.

To invest in the chances of a house providing an authentic sense of home, the dwelling should be accessible in line with a person's individual requirements and close to ordinary community infrastructure, such as shops, healthcare services, transport hubs, recreation facilities, and other public amenities. The resident/s should be in charge of what happens in the home. Appropriate assistive technologies should be utilised to meet the occupant's circumstances and preferences, to maximise personal control. Crucially, a home should be a place where a person can welcome family, friends, and visitors and build ordinary valued relationships with their neighbours. When the above elements are accomplished, a person is much more likely to take up valued roles in community life and maximise their *Citizenhood*.

People living with disability still have less housing choice than other people despite steps toward deinstitutionalisation. While the Discussion Paper highlights the importance of housing choice, it does not recognise the unevenness in choices and outcomes that already exists. The GARP should recognise the difference between a house, a facility, and a *home* particularly for people living with disability. A goal of the GARP should be to ensure that each person lives in a place where they feel an authentic sense of *home*. It should articulate what it means to have a place to call home and the characteristics that help achieve this outcome. The *Model of Citizenhood Support* provides a useful lens through which to formulate this vision. The vision should encapsulate that home is personal to the individual and a base from which they can pursue all other parts of a happy, healthy, productive life in community. Such a vision is critically important to challenging and overcoming outdated perceptions that it is appropriate for people living with disability to be excluded from the ordinary housing options available to non-disabled people.

Recommendation 10: The Greater Adelaide Regional Plan (GARP) should articulate a vision whereby all people have access to a place they can authentically call *home*. It should underscore that this principle applies equally to all people living with disability, not just non-disabled people.

Recommendation 11: The Greater Adelaide Regional Plan (GARP) should include an outcome regarding housing choice for everyone and priority actions to address the existing absence of choice for many people living with disability.

3.2. Increasing supply of accessible dwellings

Greater Adelaide urgently needs more accessible housing. It is essential the housing market and social housing options cater to the needs of all people without discrimination, including those living with disability, older people, people using prams and other aids for young children, and the many others in the community who would benefit from greater accessibility. Good quality accessible housing should meet residents' current requirements, taking into account the possibilities of a short-term injury or other mobility restriction, as well as being easily adaptable to their changing needs into the future. The problems of affordability and housing security are significantly worse for those requiring accessible housing due to the even more severe supply shortage of such dwellings.

Many people living with disability are currently residing in unsuitable accommodation that they cannot move around in, or are stuck in hospital, residential aged care, or a group house, with no foreseeable solutions to improve their circumstances. Often, people living with disability have to make do with what they can get even if it is inaccessible in full or in part. Anecdotally, some people with physical disability have reported to JFA Purple Orange that they must crawl into their bathrooms or complete personal care routines in kitchens. Similarly, many people living with disability continue to live in family homes by necessity, not choice. Others are forced into shared living arrangements with strangers in disability group houses.

Getting by in unsuitable inaccessible housing has significant impacts on the lives of people with access needs. The 2020 study 'Lived experience and social, health and economic impacts

of accessible housing', conducted by the University of Melbourne's Dr Ilan Wiesel, highlighted the broad range of consequences of inaccessible housing.[9] Almost one third of respondents to the study's questionnaire indicated it had led to the loss of a job, a missed work opportunity, reduced work hours, or reduced productivity, while more than 80 per cent agreed or strongly agreed they cannot visit family or friends' homes due to inaccessibility.

It is important to dispel a common misunderstanding about housing for people living with disability: the National Disability Insurance Scheme (NDIS) does not provide housing support for the vast majority of participants. Just over 610,000 people have a personal NDIS plan, according to the National Disability Insurance Agency's (NDIA) quarterly report for April to June 2023. Of these, about 23,000 live in Specialist Disability Accommodation (SDA).[10] This leaves more than 96 per cent of NDIS participants – and millions more Australians living with disability – to navigate the mainstream housing market where the supply of accessible affordable dwellings is well below current demand. It is essential that the housing market and social housing options in Greater Adelaide cater to the needs of all residents, including those living with disability, without discrimination or segregation. To be clear, the NDIS does not, and was never intended to, fill this significant housing gap.

Our population is also rapidly ageing, with many people increasingly looking for housing options that allow them to 'age in place' and remain connected to their local communities. Institutional settings like nursing homes no longer meet the expectations of most people for their retirement and older years. Australian Bureau of Statistics (ABS) data indicates the portion of Australians aged 65 and older in 2020 was about 12 per cent.[11] By 2066, the ABS predicts that figure will be almost a quarter of Australia's population, including about 4.4 per cent likely to be aged over 85.[12] To accommodate this significant change, houses and apartments will need to be much more accessible than most existing stock. Houses and apartments built now are highly likely to still be in use well beyond 2066. Hence, there is an

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[9] Ilan Wiesel, 'Lived experience and social, health and economic impacts of inaccessible housing', The University of Melbourne, 31 August 2020, available at https://disability.unimelb.edu.au/__data/assets/pdf_file/0011/3492686/RIA-Report-Survey-Findings.pdf.
[10] See National Disability Insurance Agency (NDIA), 'NDIS Quarterly report to disability ministers: Q4 2022-23', available at https://www.ndis.gov.au/about-us/publications/quarterly-reports.
[11] See Australian Institute of Health and Welfare (AIHW), 'Demographic profile', 28 June 2023, available at https://www.aihw.gov.au/reports/older-people/older-australians/contents/demographic-profile.
[12] *Ibid*.

urgent need to adopt accessible design standards in order to begin to futureproof residential dwellings. Otherwise, governments and individuals will face the exponentially higher costs of retrofitting accessibility features to these dwellings in the future.

Every person in Greater Adelaide is likely to benefit from housing that is accessible at some stage in their lives. Accessible housing is not just about people living with ambulant disability; it is about ageing in place, it is about young families, it is about anyone who has ever, or will ever, experience any form of temporary injury, it is for people who develop unexpected disease or illness, it is about people with someone with disability in their lives who wants to visit – it is about everyone. A change in life circumstances happens every day, sometimes it is for happier circumstances – like having a child – but for many it will be for more challenging circumstances, like a motor vehicle accident that causes injury, a medical event such as stroke, or being diagnosed with an illness such as Motor Neurone Disease (MND). When this happens, living in a house with basic accessibility features reduces the stress, cost, and hardship of that change. Struggles people face with changes in their lives, good or bad, and the costs associated with these changes, can be largely avoided through the implementation of basic accessibility features in housing design and construction.

Recommendation 12: The Greater Adelaide Regional Plan (GARP) should include an outcome and associated targets to increase the supply of accessible dwellings in the region, including for both private market and social housing.

3.3. Implementing the NCC Livable Housing Design Standard

JFA Purple Orange has welcomed the South Australian Government's commitment to implementing the new National Construction Code (NCC) 2022 Livable Housing Design (LHD) Standard (as well as the new energy requirements) in South Australia by October 2024. This is a crucial first step toward addressing the need for more accessible housing across our state and the nation, as well as future proofing housing stock for our rapidly ageing population. Adapted from the 'Silver' level requirements of the Livable Housing Design Guidelines of Livable Housing Australia (LHA), the NCC Standard will ensure that residential properties are easier to enter and navigate in and around, as well as allowing further adaptations to be made later to suit a resident. Examples of these basic requirements are at

least one entrance without a step, a ground level toilet, a hobless shower recess, and reinforced walls so grabrails can be added later if needed. Building in line with the 'Gold' level requirements of the Livable Housing Design Guidelines remains voluntary, but would deliver significant additional accessibility particularly in kitchens, living areas, and bedrooms, as we address further below.

As a member of the Ministerial Liaison Group Subcommittee, JFA Purple Orange has appreciated the opportunity to participate in conversations with the housing industry peaks about potential concessions to ensure they are sensible, necessary, and evidence based. It has been unfortunate that many discussions continue to circle back to proposing 'blanket' exemptions on all elements of the NCC LHD when a property may present with an evidence-based reason for a concession on one element of the LHD Standard. For example, if a step free entrance cannot meet the 1:14 maximum gradient from the footpath, garage, or car space then the stance taken by peak housing industry bodies has been for the house to be exempt from all LHD Standard elements, despite there being no evidence-based reason for the other elements not to be applied to the property. Just because a person might need assistance to enter a property does not mean they should not be able to use the bathroom independently while inside the home. Maximising accessibility means maximising independence.

Not only do blanket exemptions completely undermine the intention of the NCC LHD – which is to allow people to move around in their home with dignity throughout all stages of their lives – it will also create further stress for the housing construction industry into the future. This is especially the case with other jurisdictions across Australia moving to adopt the Standard, some well ahead of October 2024, and is the reason why many have been calling for a nationally consistent approach. Standardised products under the current requirements will become redundant requiring bespoke orders, while those that comply with the new rules will become the new standard items resulting in economies of scale that reduce their price. Therefore, any setback to the broad implementation of the new Standard, be it slow take up or excessive exemptions, will further inflate building costs, exacerbate supply shortages, delay builds, and result in more 'red tape' in compliance and materials sourcing.

It will take time for the implementation of the NCC LHD to incrementally expand the supply of accessible and safe accommodation for people living with disability, older people, others with mobility needs, and parents with children, among others, so time is of the essence. Therefore, it is essential the NCC LHD be embedded in the GARP and for there to be targets to ensure the roll out remains on track and new accessible dwellings are added to the housing stock in the region.

Recommendation 13: The Greater Adelaide Regional Plan (GARP) should include a target that measures the number of dwellings built that fully comply with the National Construction Code (NCC) 2022 Livable Housing Design (LHD) Standard, those that partially comply due to an exemption, or those that do not comply at all as a result of 'blanket' exemptions, including for both private market and social housing. This will enable better monitoring of supply, help identify any issues encountered in the implementation, and ensure the housing industry and governments are accountable for delivering genuine change.

3.4. Promoting Livable Housing Design beyond the NCC

The formulation of the GARP presents a valuable opportunity to drive increased adoption of accessible building designs throughout its term beyond what the formal adoption of the NCC LHD will, in its current form, achieve. There are a number of ways in which the GARP should promote best practice accessible design to meet the needs of residents with diverse access needs and our rapidly ageing population. First, the GARP should set an explicit target that all new dwellings are built to high level accessibility standards within 20 years. This should include a statement that all tiers of government continue to work to improve and expand the features included in the mandatory NCC requirements over time and actively participant in future review and updating processes conducted by the Australian Building Codes Board (ABCB).

Second, through the GARP, the Commission should work to promote the benefits of the NCC LHD and challenge mindsets based on maximising concessions and/or 'blanket' exemptions. Even if a property may technically be exempt from one or more elements, there will be many instances where some elements can be achieved, or innovative design would increase

accessibility even if this is not mandatory. Concessions and exemptions should only be used if absolutely necessary and are not themselves compulsory. The GARP can help support this attitude change whereby the dominant industry mindset becomes one to maximise accessibility rather than to take all possible steps to avoid it. The GARP should reiterate the importance of compliance and endorse best practice approaches to accessibility. It should address the fact that exemptions are designed to be an option of last resort where the practicalities of a build, such as an excessive slope, make it unavoidable. Further, it should counteract false claims that there is no point making the internal elements of a dwelling accessible if the entry standard cannot be met.

The third way that the GARP should promote accessibility beyond the NCC LHD is to highlight options for designs and builds that go beyond mandatory compliance. Although this is voluntary, it produces significant benefits. Examples include Livable Housing Design's 'Gold' level or adaptations thereof. While constructing houses to the NCC LHD will ensure dwellings are easier to enter and move around in, provide easier access to bathrooms, and allow for further adaptations to be made, such as installing rails, building to the 'Gold' level would deliver greater access in the kitchen, living areas, and bedrooms, among other aspects. The GARP should provide a list of resources that support the industry to go beyond mere compliance and voluntarily adopt best practices. The extent to which this is achieved should also be monitored across the Greater Adelaide region.

Recommendation 14: The Greater Adelaide Regional Plan (GARP) should include a target that all dwellings are built to high level accessibility standards within 20 years. To support this outcome, it should promote the benefits of accessibility and include a target to measure the number of dwellings built to levels of accessibility that exceed mandatory compliance, for both private market and social housing.

3.5. Implementing an Accessible Housing Overlay in South Australia

The South Australian Planning and Design Code includes an Affordable Housing Overlay, among many others. Its purpose is to address the shortage of affordable housing and to ensure affordable options are integrated in residential and mixed-use developments. This approach would also deliver significant benefits if it was adopted for accessible housing. Not

only would it increase the supply of accessible dwellings, but it would ensure integration that avoids the segregation, congregation, and 'ghetto-isation' of housing for specific cohorts and the consequences this causes, as outlined throughout this submission. It may involve developers partnering with specialist housing providers to build fully accessible houses (that is, to a higher level of accessibility than required by the NCC LHD) scattered throughout the neighbourhood with consideration given to proximity to bus stops, train stations, and similar services and amenities.

An Accessible Housing Overlay that is applied to new developments would align with South Australia's commitments under *Australia's Disability Strategy 2012-2031*, the State Disability Inclusion Plan, known as *Inclusive SA*, and *Our Housing Future 2020-2030*. We believe that the combination of overlays and early proactive planning in partnership with developers would generate significant additional community benefits especially from greenfield developments. We have taken the initiative to provide a draft of how an Accessible Housing Overlay could be formulated, which is provided in Appendix A of this submission.

For an Accessible Housing Overlay to achieve its greatest impact it is likely that broader planning and regulation issues also need to be resolved. For example, housing industry stakeholders often point to the narrowness of blocks or overall allotment sizes as a reason why accessible designs cannot be implemented. Yet, this does not deal with why the allotments are allowed to be set to such small dimensions in the first place, especially within greenfield developments. Further, excessively small blocks also have other consequences, including for car parking (noting many greenfield developments are not served by public transport), garbage and recycling collections, tree canopy, and general livability especially for families and children needing space to play. Therefore, we urge the Commission to commit in the GARP to a review of all planning rules and regulations and how they impact the capacity to increase the supply of accessible livable housing within the Greater Adelaide region.

Recommendation 15: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a Planning and Design Code Amendment to create an Accessible Housing Overlay as soon as possible (for example, see Appendix A).

Recommendation 16: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a review of all planning rules and regulations and how they impede the goal of increasing the supply of accessible livable housing in the Greater Adelaide region.

4. Building inclusive neighbourhoods and communities

Inclusive communities are where neighbourhoods are welcoming and inclusive of all their members, where social infrastructure is available and accessible to meet residents' needs, where kindness is extended to everyone, where social connections are made, and where natural safeguards emerge in people's lives. But too often people are excluded from their neighbourhoods. Some people may not be easily visible to others, perhaps because they rarely venture out. Or because they are receiving assistance from a support provider and leave the house escorted. Or because others notice support workers visiting a house so are less inclined to reach out or even chat over the fence. Where support professionals are obviously present, where houses resemble facilities, or where the physical environment creates a sense of seclusion, the neighbourhood rhythms created can result in people being disconnected. They are *in* the neighbourhood, but not *of* the neighbourhood.

The emergence of inclusive neighbourhoods and communities cannot be taken for granted. It takes deliberate intentional actions and investments based on strong pre-planning and good design. Unfortunately, in recent years some new greenfields developments resemble 'dormitory' suburbs; places where people sleep but do little else. They commute to other places for everything from work to shopping to recreation. Some may find social connection and a sense of community elsewhere, perhaps at a sporting club they commute to, while others are left isolated and disconnected within a 'community' that has little sense of welcome or neighbourliness on offer. Transport options are also likely to be very limited for those without private vehicles. Munno Para West is one obvious example of a recent 'dormitory' development. It is physically disconnected and some distance from Munno Para itself. It has nothing that resembles a neighbourhood hub, no cafes or shops where people gather, no school, only pockets of vegetation and small parks, and no open recreation space where people could be drawn together organically. New rows of houses are added as the development expands toward Munno Para Downs, with the same 'dormitory' style approach repeated.

The GARP should act as a circuit breaker on new 'dormitory' style developments and give focused attention to actions and investments that will ensure inclusiveness and neighbourliness become central features of all communities in the region. This is the second

critical element that is largely overlooked in the Discussion Paper and its importance is the focus of this part of our submission. Overarching terms like 'liveability' tend to influence thinking at a high level but fail to capture the essence of what strong inclusive communities need on the ground at a grassroots level. Hence, the GARP should provide clear guidance on what development conditions and design features provide the best foundations for the emergence of new inclusive, welcoming, and connected neighbourhoods, how the same can be encouraged, implemented, and sustained in existing communities where elements may already be present, and what can be done to 'retrofit' this to 'dormitory' style developments and suburbs.

Recommendation 17: The Greater Adelaide Regional Plan (GARP) should clearly define the characteristics of the style of neighbourhoods it seeks to build and identify the key elements of planning, design, and construction that will produce this outcome. It should focus on how Greater Adelaide grows in ways that create and enhance inclusion, connectedness, neighbourliness, and a genuine sense of welcome.

4.1. Changing negative attitudes and creating connections

An inclusive community benefits from the participation and contribution of all its members, bringing a diversity of voices, ideas, and perspectives into decision-making, activities and events, businesses, and general community life. It is this diversity that makes community life rich, interesting, and dynamic for the benefit of all. Despite improvements in recent years, negative attitudes towards various groups in our communities including people living with disability persist. Many non-disabled Australians do not regularly interact with people living with disability and have limited understanding of inclusion or the benefits of embracing diversity and all members of their community. Those who 'fit in' usually overlook the socially constructed norms that enable this while excluding and shaming others (even if unintentional).

The barriers faced by people living with disability are not the result of physical, intellectual, or psychological impairments, but stem from the way society is structured, functions, and perpetuates 'othering'. Exclusionary practices, such as segregated schooling, housing, transport, employment, and social programs are common and widely accepted as the norm,

but this must continue to change. An appreciation of diversity in all its forms needs to be woven into lives from an early age to facilitate the ways we think, feel, and act towards people living with disability.

Inclusive neighbourhoods create positive casual interactions between people living with disability and non-disabled members of the community, breaking down stereotypes and supporting meaningful connection. This is further harnessed by increased participation of people living with disability in mainstream education, employment, and community settings. It has implications for how we plan, design, and develop new communities in growth areas. Planners and designers need to give more attention to how and where residents will interact, get to know one another, and build connections, and ensure the elements that will facilitate this are present and planned for in all developments.

The approaches taken by those developing Intentional Communities are useful to informing how to plan and design for interaction and connection. These communities provide a mix of places and spaces that encourage incidental interaction, such as accessible walking paths, and more formal community hub-style places to facilitate connections and relationship building between people in communities. Often, these integrate environmental aspects to ensure greener sustainable communities, for example a community park with a pond that is also part of a stormwater management system or a community garden that utilises the residents' organic waste.

These communities are designed with intention to support the wellbeing of those who will live within them and prioritise the human need for connection and fellowship as a core part of the approach. They make it easy for the residents who will live there to connect with one another. We believe all developments should be planned and built with creating neighbourhoods at front of mind. The GARP should provide a set of guidelines or standards about how this is achieved to help facilitate this outcome.

Recommendation 18: The Greater Adelaide Regional Plan (GARP) should recognise the impact of negative attitudes, stigma, and stereotypes for people living with disability and include actions to breakdown these barriers, including by addressing the need to plan, design, and develop in ways that will facilitate interactions and connections between people in neighbourhoods.

4.2. Facilitating natural safeguards

The link between social isolation and loneliness and people's physical and mental health is not a new concept. Over the years many researchers have tackled the topic with similar conclusions – if people are excluded from society, the more prevalent loneliness and isolation becomes, particularly among some population groups like people living with disability, resulting in a decrease in people's physical and mental health. This places more strain on our already struggling healthcare systems and also reduces life expectancy. On the other hand, inclusive communities 'foster strong connections to people, place and nature. Such connections nourish people – physically, mentally, and spiritually – and provide a sense of wellbeing and belonging.'[13]

Freely given relationships are the greatest protections and natural safeguards for us all, including people living with disability. When people living with disability are separated, isolated, and disconnected from their community, this can lead to a life of exclusion and vulnerability to violence, abuse, neglect, or exploitation. The more inclusive communities and neighbourhoods are, the more likely it is that people living with disability will have informal support networks, which create natural safeguards.

Inclusive neighbourhoods pave the way for people living with disability to build informal social networks with neighbours and other members of their local community. This might be as simple as a person visiting the local library or a café weekly and becoming known by staff, or a person organising regular catch ups with neighbours, or attending the local community garden. These connections can serve as an important natural safeguard, as community members would notice and check in if the person was absent unexpectedly or for a significant period of time.

The tragic death of Ann Marie Smith in 2020 shocked South Australians and the nation. Ms Smith, who lived with Cerebal Palsy, died in hospital from septic shock, multiple organ failure, severe pressure sores, and malnourishment. Ms Smith was cut off from her neighbourhood and community with her only contact being her support worker, who has

[13] Lisa Stafford, Matt Novacevski, Rosie Pretorius, Pippa Rogers, 'What makes inclusive communities? Meanings, tensions, change needed', Planning Inclusive Communities Research Project Stage 1a report 3 MAR (2023) *University of Tasmania* 17.

since been jailed for manslaughter. Devastatingly, Ms Smith had very minimal community connections that could have given rise to concern over her health and welfare. The case highlighted the inadequacies of relying on formal safeguards like a complaints system. Instead, we must work toward creating and strengthening natural safeguards between people within neighbourhoods and communities and to support this through intentional planning and design.

Recommendation 19: The Greater Adelaide Regional Plan (GARP) should recognise and reinforce the important role neighbourhoods and communities that are planned, designed, and built for inclusion and connection can play in creating mutual natural safeguards between people, especially those experiencing isolation and disconnection.

4.3. Initiatives to promote neighbourliness and a sense of belonging

Inclusive neighbourhoods are characterised by the rhythms of neighbourliness and sense of mutual belonging. Sometimes this may emerge organically, usually as a result of the initiative and community spirit of one or a couple of proactive community members, but more often it requires deliberate and intentional actions at least to start something that can then grow. These initiatives are not expensive as they harness the community mindedness that already exists in communities. Usually, a small seed grant or investment is enough to set an activity or regular event up that will then be sustained by volunteer contributions and local momentum. Ultimately, these initiatives pay dividends far exceeding the original financial investment.

Sometimes the seed from which neighbourliness grows is a gathering place rather than activity or event. American urban sociologist Ray Oldenburg developed the notion of the 'third place': inclusively social places that are crucial for all people to live a healthy good life.[14] The 'third place' is not the home ('first place') or work setting ('second place') but exists within the community – at cafés, pubs, libraries, shops, playgrounds, churches, sports and recreation centres, and so forth. They are places where people from all walks of life

[14] See for example Ray Oldenburg and Karen Christensen, *Third Places: A Very VERY Short Introduction*, 2023, Berkshire Publishing Group.

come together equally. Concerningly, the Discussion Paper elevates the requirement for land for housing and jobs throughout, without mentioning these important community places.[15]

The nature of activities, events, places, and spaces for community connection will vary by location. People living in a seaside community will be drawn to the beach while for those living in a Hills community it is likely to be a park or natural setting. Therefore, it is important to avoid a one-size-fits all approach. Not only are these less likely to be sustained, but it is the uniqueness of each community that builds a sense of community pride, cohesion, shared interest, and positive energy. Funding should support ideas that come from within local communities at a grassroots level. It does not typically require a community development approach, but a relatively hands off support role that provides information to locals about how to go about creating an initiative and what resources are available that they can draw upon. It is local people taking local action. And it must not be disability-specific – it should be designed and implemented in ways that draw everyone in, including those who are harder to reach and engage due to greater social isolation.

Recommendation 20: The Greater Adelaide Regional Plan (GARP) should include actions and outcomes regarding funding small seed grants or similar for local grassroots projects in support of inclusive connected neighbourhoods and communities.

Recommendation 21: The Greater Adelaide Regional Plan (GARP) should elevate the essential role of community places and spaces in addition to land for houses and jobs. Community places and spaces should be part of every development plan and design for where Greater Adelaide should grow.

[15] See for example page 100 of the Discussion Paper.

5. Prioritising accessible communities

The inaccessibility of communities and social infrastructure continues to be a significant barrier to the full participation of many people in the community life of Greater Adelaide. These barriers prevent people accessing and using essential services and participating in the social, recreational, sporting, religious, and cultural life of their communities. It also prevents everyday social interactions and social connections, a topic we will focus on in the next part of this submission. Problems of inaccessibility particularly impact South Australians living with disability, but it is important to highlight that ensuring ease of access in all its forms benefits everyone. Again, we emphasise the critical importance of the GARP recognising and responding to the needs of our rapidly ageing population now or face significantly higher costs in the future.

Therefore, the third critical element that we believe the GARP must address is the accessibility of communities including, but not limited to, the built and natural environments and social and community infrastructure including public spaces and parks, transport, shopping and service precincts, and workplaces, to name but a few examples. While the Discussion Paper does pleasingly state 'every person, no matter where they live, should have access to transport, employment, healthcare, shops and services'[16], more specific detail is required regarding how these aspirations will be achieved for everyone's benefit, including people living with disability, older people, people with short-term injuries, parents with prams, delivery workers, and others with mobility needs. If the existing levels of inaccessibility are not adequately addressed, the GARP will not realise the proposed outcome of making the Greater Adelaide region a more equitable and socially cohesive place and the livability of communities will remain unacceptably poor especially for those living with disability.

As mentioned above, the GARP needs to align with *Australia's Disability Strategy 2021-2031* to ensure there is the policy and program consistency that will maximise outcomes. Unless accessibility is given greater priority in the GARP, the South Australian Government's commitments to improving accessibility in the Strategy will not be realised. All tiers of

[16] See page 59 of the Discussion Paper.

government in Australia have committed to making accessible communities a policy priority in order to deliver the important Strategy outcome: 'People with disability live in inclusive, *accessible* and well-designed homes and *communities*' [emphasis added]. Similarly, according to the South Australian Planning and Design Code[17], Master Planned Neighbourhood Zones also have the 'desired outcome' of creating: 'A new or expanding community with a diverse range of housing that supports a range of needs and lifestyles located within *easy reach* of a diversity of services, facilities and open space' [emphasis added]. It is essential that the GARP explicitly aligns with these obligations.

5.1. Planning for accessible communities

Making accessibility a top priority for all new developments, builds, renovations, upgrades, and replacements is the most effective and efficient approach to creating accessible communities. It avoids expensive repairs and retrofits later, as well as starting to reduce the cost and productivity burdens encountered everyday as people are forced to navigate accessibility barriers. Planning is critical to this proactive approach. As the Discussion Paper notes, the South Australia's planning system has an important role to play in tackling many pressing issues and we believe accessibility should be emphasised as a critical aspect of this.[18]

In our recent consultations with South Australians living with disability regarding the development of the National Housing and Homelessness Plan, participants told us more thought needs to be given to the location of housing so that people can live near essential community infrastructure and services, such as transport, healthcare, and shops. Participants noted accessible housing and SDA are increasingly located further away from these basic services, as well as community activities and events resulting in greater exclusion and isolation of people living with disability. The Discussion Paper, drawing on State Planning Policies (SPPs), suggests concentrating growth near existing social infrastructure. While we support this objective, we are concerned about how the SPPs seem

[17] PlanSA, 'Planning and Design Code', version 2023.9, 29 June 2023, pp.1442-1443, available at https://code.plan.sa.gov.au/__data/assets/pdf_file/0005/797684/Full_Code-29062023_Final.pdf.
[18] For example, at page 7 of the Discussion Paper.

to trade off maximising positive social outcomes with an emphasis on servicing communities through 'cost effective infrastructure'. Too often, infrastructure planning and construction prioritises cost-effectiveness while the economic and social benefits of providing genuinely accessible community infrastructure are not properly quantified.

The Greater Adelaide Regional Plan should recognise the need to plan for genuinely accessible communities. Housing for people living with disability should be spread throughout an accessible community and not congregated or segregated. It should also not create 'ghetto-isation' of public, community, and SDA communities. The many benefits of building accessible communities should provide the context for how green and brownfield developments are planned, designed, and constructed.

Recommendation 22: The Greater Adelaide Regional Plan (GARP) should emphasise the impact of every step of the planning process on final outcomes and ensure that planning for accessibility is a priority action under the plan.

5.2. Investing in community infrastructure that is accessible for all

The South Australian Government has this year made a series of announcements about new greenfield land releases, particularly in the northern and southern suburbs of Adelaide. The GARP contemplates a greater choice of housing in the right places, including small scale infill, redevelopment of brownfield sites, development along urban corridors, and greenfield growth on the edges of established urban areas. These developments present both opportunities and challenges. It is imperative the Government ensure that adequate infrastructure is put in place to support these new communities before residents begin to move in. Otherwise, communities are left without vital services, such as access to public transport, schools, amenities, and health services. It is also critical that community infrastructure adheres to the principles of Universal Design and ensures people living with disability, older people, people with prams, people with short-term injuries, and all others can easily move around, including via accessible footpaths, carparking, and building access points.

It is critically important that community and social infrastructure does not continue to perpetuate segregation of people living with disability. For far too long, society has perpetuated segregation in education, employment, housing, transport, and other community infrastructure and this creates barriers in both accessibility and attitudes. In their effects, these separate 'special' disability-focused facilities, services, and programs reinforce a community perception that people living with disability are best served by having separate 'special' things. This has been termed 'othering'. It kills true social, community, and economic participation and should have no place in our decision-making. The recent Final Report of the Royal Commission into Violence, Abuse, Neglect, and Exploitation of People with Disability has placed a spotlight on these unacceptable practices. Ordinary neighbourhood resources and opportunities available to all local people are a natural gateway to community membership. They bring meaningful valued roles readily available in our communities, often at low or no cost, into the lives of people living with disability. Assisting a person to connect to these resources and opportunities by ensuring communities are accessible can lead to a snowballing of connections and relationships for a person over time.

Recommendation 23: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets that ensure all investment is directed to community infrastructure that is genuinely accessible to, and inclusive of, everyone. It should explicitly rule out investment in segregated provisions in any form.

5.2.1. Transport infrastructure

Given that accessible transport is fundamental for many people, including people living with disability, to access essential services and participate in the social, cultural, and economic life of our communities, we believe the GARP should give focused attention to how this can be delivered across the Greater Adelaide region. Indeed, under Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), Australia is obligated to ensure that people living with disability can access transport services 'on an equal basis with others.' Furthermore, in *Australia's Disability Strategy 2021-2031*, federal, state, territory, and local governments have recognised the value of accessible transport services to both

individual and community lives and committed to the goal of ensuring that 'transport systems are accessible for the whole community' (priority number 5).[19]

This outcome is yet to materialise despite the Disability Standards for Accessible Public Transport 2002, known as the Transport Standards, having committed Australia to achieving fully accessible public transport and associated infrastructure by the end of 2022 (except for the train and tram conveyances, which had until 2032 to comply). JFA Purple Orange has had a longstanding interest in public transport in South Australia and has regularly engaged with the disability community on this topic over many years. In August 2019 and July 2022, we conducted transport surveys to understand how people living with disability use public transport services, the improvements that have occurred over time, and the barriers that continue to be present. Although survey respondents indicated there have been improvements since 2002, our July 2022 survey revealed that only 11 per cent of respondents rated the current accessibility levels of public transport as good or very good. This compares to 41 per cent who rated it as adequate, 38 per cent as poor, and 10 per cent as very poor.

We believe the GARP must highlight the inadequate rate of progress in achieving accessibility of public transport, particularly in relation to lowering reliance on private vehicles. It should commit governments to much-needed investment and genuine accountability and reporting mechanisms to ensure commitments and obligations are fulfilled. Further, we urge the Commission to undertake a comprehensive audit of shortcomings of all relevant transport options and infrastructure across the Greater Adelaide region as part of the process to develop the GARP. In particular, this audit should utilise the expertise of people living with disability who use this infrastructure. This will not only help drive change, but also set an important baseline against which outcomes from GARP can be measured in the years to come. This will be an essential element of ensuring that the new GARP succeeds where current approaches are failing.

Recommendation 24: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of public transport services and infrastructure

[19] See *Australia's Disability Strategy 2021-2031*, available at https://www.disabilitygateway.gov.au/ads.

across Greater Adelaide. It should also identify priority actions to fix existing gaps through a comprehensive audit that sets a baseline for progress.

5.2.2. Education infrastructure

All South Australian children should have the option of attending their local school with the assurance of being welcomed, supported, and included, and thereby receiving a high-quality Inclusive Education. Sadly, for too many children and young people living with disability in South Australia, this is not the case. Yet, decades of research and evidence[20] tells us that Inclusive Education best prepares students living with disability for life and success. Research also demonstrates that non-disabled students greatly benefit from Inclusive Education. These benefits include a more positive sense of self, enhanced communication and language development, increased awareness of diversity, and a higher quality education that is better suited to individual needs. An environment should be designed to meet the needs of all people who wish to use it; this is a fundamental condition of good design.[21] When a building is accessible it allows everyone the ability to access and use it. Young people living with disability have a right to an education in the same way that other students do, and this right is supported if facilities are designed, planned, and built to give the best access, participation, and learning.[22]

It is extremely concerning that new schools to support areas of population growth, such as those at Aldinga and Angle Vale, are being established with separate Disability Units rather than implementing Inclusive Education models. All schools, especially new schools, should be accessible and inclusive of all people; this includes students, their parents and supporters, and staff. The GARP needs to clearly state that new special education provisions should not be built in the region. Otherwise, exclusionary habits will persist and will sustain

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[20] For more information, see Inclusive School Communities project, 'Final Project Evaluation Report', October 2020, available at https://inclusiveschoolcommunities.org.au/news/final-project-evaluation-report.
[21] National Disability Authority Centre for Excellence in Universal Design (2014), What is universal design, http://universaldesign.ie/What-is-Universal-Design/
[22] Government of South Australia Department for Education and Child Development (2016), Effective Building Practices for Children and Students with Disability project report, https://www.education.sa.gov.au/sites/g/files/net691/f/effective-building-practices-for-children-and-students-with-disability-august-2016.pdf

the demand for separate segregated provision. Building an Inclusive Education system will not happen overnight but nor does it need to take a generation (as has been admirably demonstrated in other jurisdictions). The GARP must commit to the construction of education infrastructure that is accessible and inclusive. Clear timelines for the desegregation of schooling must be made now to stem the waste of life chances experienced by young people living with disability.

Recommendation 25: The Greater Adelaide Regional Plan (GARP) should endorse the provision of Inclusive Education in all schools and specifically rule out the establishment of new segregated education provisions anywhere in the Greater Adelaide region effective immediately. This must preclude any new 'special' schools, units, programs, or similar.

5.2.3. Health infrastructure

The South Australian disability community has seen adverse consequences in recent times because of inaccessible new health infrastructure at the new Royal Adelaide Hospital. This inaccessibility was due to the lack of genuine engagement with people living with disability throughout the entire build process. While the development involved people living with disability at the start of the process, the focus diminished during the build process, and basic accessibility and inclusion elements were lost by the time the build was complete. Not only was this embarrassing at the time but it made it much more expensive to rectify those basic elements. This not only provides important lessons for the development of new health infrastructure, but, indeed, for all social and community infrastructure.

To avoid the same thing happening again with future health infrastructure and for the GARP to demonstrate real leadership on matters of accessibility and inclusion, we emphasise the importance of recognising the need for people living with disability, among others, to have a voice at the table during the planning process and to be involved in decision-making processes as part of authentic co-design throughout the entire project, so that new health infrastructure is designed with accessibility and inclusion at the forefront of priorities. This will help ensure this infrastructure is fully accessible and inclusive to all members of our community, including (but not limited to) young families and children, parents and children living with disability, grandparents, First Nations people, the CALD community, healthcare workers, and visitors.

Recommendation 26: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of health infrastructure across Greater Adelaide.

5.2.4. Changing Places

JFA Purple Orange has strongly advocated for more Changing Places facilities to be provided in the region, which will enable people with high support needs to access and participate in their communities. South Australia currently has only 18 facilities compared to Victoria that has 113 out of 247 nationally (listed in the online directory).[23] Therefore, it is critically important that the GARP recognises the need for facilities such as this to boost the accessibility of our communities, including at shopping precincts, parks, beaches, recreation facilities, and other public spaces. We understand there is often commentary about the maintenance and security of these facilities, including the potential for vandalism, however there are a range of management options for Changing Places to be kept secure, for example through the use of MLAK keys[24] that restrict access to only those who genuinely need to use them.

Changing Places facilities are a crucial element of meeting minimum standards of accessibility. This is acknowledged in the State Disability Inclusion Plan, known as *Inclusive SA*. Additionally, the 2021-22 *Inclusive SA* Annual Report highlights the Federal Government's commitment to co-contribute to a Changing Places facility in each of the 400 Local Government Areas (LGAs) nationally that currently do not have a facility by 2025-26 in order to 'ensure no person with disability is left behind'.[25] Given South Australia has 68 LGAs, the State is falling well short of this benchmark, including in the Greater Adelaide region. The GARP should highlight the benefits of Changing Places to creating accessible communities and measure the progress of their roll out. We note that Changing Places are

[23] Changing Places, 'Find a Changing Places toilet', accessed 28 March 2023, available at https://changingplaces.org.au/find.
[24] For further information, see Changing Places, 'MLAK Keys', at https://changingplaces.org.au/mlak.
[25] Government of South Australia, 'Annual Report 2021-22: Inclusive SA State Disability Inclusion Plan 2019-2023', available at https://inclusive.sa.gov.au/__data/assets/pdf_file/0017/141641/Inclusive-SA-Annual-Report-2021-2022.pdf.

currently regarded as among the best design and construction options available, but this should not prevent the Commission or government investigating alternative models that achieve the same outcome.

Recommendation 27: The Greater Adelaide Regional Plan (GARP) should promote the roll out of Changing Places facilities and include a measure to track progress.

5.3. Creating a public realm that includes everyone

The public realm is a broad term that captures all spaces open to people that are not under private ownership or subject to restricted access. It is an important concept because it is impossible to list every aspect of community space as a specific consideration (although we have highlighted a few examples above). Therefore, such an expansive term can broaden the horizon of the things we think about when we talk about making places accessible to all. In other words, we are talking about everyone being able to access everything in the public realm on an equal basis with others. We are not talking about 'equivalent' access or special separate provisions for particular people. Those approaches are exclusionary and have no place in society. The GARP should reflect and respond to the need to make the public realms of the Greater Adelaide region accessible to everyone and set interim targets to achieve this.

The accessibility of the public realm also has implications for many other aspects of life. According to a recent report by the University of Tasmania, 'well-known urban scholars and advocates like Jane Jacobs, Paul Davidoff and David Harvey... [have] signaled concern for the erosion of public spaces and commons.'[26] They then added, 'the community design movement emerged from the 'realizations that the mismanagement of the physical environment is a major factor contributing to the social and economic ill of the worlds and there are better ways of going about design and planning'.[27] When the University asked people living with disability what kind of community spaces were important to them, they

[26] Lisa Stafford, Matt Novacevski, Rosie Pretorius, Pippa Rogers, 'What makes inclusive communities? Meanings, tensions, change needed', Planning Inclusive Communities Research Project Stage 1a report 3 MAR (2023) *University of Tasmania* 17.
[27] Ibid.

identified parks, beaches, and the bush; places where there was an opportunity to watch birds, smell flowers, listen to the ocean, be present with wildlife and other natural sensory experiences, with some saying this gave them 'a sense of life'.[28] To ensure that people living with disability have equal opportunity to engage with and be revitalised by the natural world, the GARP must recognise the need for green spaces within the public realm to be accessible for everyone.

Recommendation 28: The Greater Adelaide Regional Plan (GARP) should adopt an expansive vision of the public realm and recognise the critical importance of making green spaces accessible to everyone.

5.4. Making emergency infrastructure accessible

There is growing awareness of the disproportionately high risks that disasters pose for people living with disability. In response, there has been academic and governmental recognition, interstate and internationally, that co-designing, and regularly engaging on, emergency policies and procedures with the disability community is essential for reducing these unacceptable dangers. With almost one in five Australians living with disability and given the increasing frequency and severity of disasters and unprecedented events, it is essential that the GARP recognises the need to involve people living with disability in the planning of new emergency infrastructure. Co-design is needed particularly regarding location and accessibility of evacuation and relief centers. Existing emergency refuges should also be assessed for their accessibility. So too should procedures and emergency information channels are other elements where accessibility has sometimes been overlooked, notwithstanding advancements that were achieved during the Covid-19 pandemic.

Recognising the need to, at the very least, consult with the disability community regarding planned emergency infrastructure would increase compliance with Australia's international

[28] Ibid 22.

obligations. Australia is a signatory to the Sendai Framework for Disaster Risk Reduction 2015 – 2030, and article 7 states:

> Governments should engage with relevant stakeholders, including women, children and youth, *persons with disabilities*, poor people, migrants, indigenous peoples, volunteers, the community of practitioners and older persons *in the design and implementation of policies, plans and standards.* [emphasis added]

Meanwhile, Article 11 of the United Nations Convention on the Rights of Persons with Disabilities states:

> States Parties shall take, in accordance with their obligations under international law, including international humanitarian law and international human rights law, *all necessary measures* to ensure *the protection and safety of persons with disabilities* in situations of risk, including situations of armed conflict, humanitarian emergencies and the occurrence of *natural disasters.*

With the rising rate of disasters and unprecedented events, people living with disability must not be overlooked in the essential planning for how communities in Greater Adelaide prepare, respond, and recover from all types of potential emergencies.

Recommendation 29: The Greater Adelaide Regional Plan (GARP) should make accessible emergency infrastructure, procedures, and information provision a top priority and include an outcome and targets to achieve this.

5.5. Providing accurate information about accessibility

Notwithstanding the urgency of investments in accessible community infrastructure, we recognise that the extent of change that is needed will not occur overnight. In the meantime, the GARP should prioritise consideration of new consistent standards for the dissemination of information about accessibility across the Greater Adelaide region. Governments, businesses, organisations, and management bodies should be required to make freely available clear information about what accessibility features exist in their spaces and what is not accessible according to a basic framework co-designed by people living with disability. This would make it much easier for people to go about their lives

without the excessive need for research and enquiries (often misleading) to plan their days. It would also encourage people to expand their horizons and community interactions beyond those places that they already know to be accessible, which is good for businesses and for creating a rich diverse community life in Greater Adelaide.

Recommendation 30: The Greater Adelaide Regional Plan (GARP) should commit to an action that requires the co-designing and implementation of a simple framework, definitions, and standards for the provision of information about the accessibility status of places and spaces that can be used by governments, businesses, organisations, and others to communicate clear consistent information to the public.

6. Conclusion

Thank you for the opportunity to contribute a submission toward the development of this important plan for the Greater Adelaide region.

The GARP must include strategies to increase the supply of accessible dwellings throughout the region to fulfil existing unmet needs and to futureproof housing supply for a rapidly ageing population that increasingly prefers to age-in-place. It must elevate community places and spaces and the importance of planning and designing for inclusive neighbourhoods alongside its focus on growth for new housing and jobs. It should insist that all community and social infrastructure is fully accessible to meet the needs of the whole community including people living with disability, older people, people with short-term injuries, parents with prams, delivery workers, and all others with mobility needs. Each of these critical elements that are largely overlooked in the Discussion Paper will pay economic and social dividends far exceeding the effort and resources required to implement them.

We would like to advise the Commission of our eagerness to participate in further opportunities to shape the draft GARP. We are very keen to meet with the team working on developing the plan to discuss our submission and answer any questions you may have. We invite you to arrange this by contacting Mr Robbi Williams, CEO of JFA Purple Orange, on [redacted] or via email at [redacted]

7. Appendix A – Draft Accessible Housing Overlay Code Amendment (SA Planning and Design Code)

Insert:

Accessible Housing Overlay

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	Housing that is accessible to, and readily adaptable for, a range of occupant and visitor useability needs is assured and promoted.
DO 2	High-quality accessible housing design and construction is assured and promoted.
DO 3	Accessible housing that is located in close proximity to accessible community infrastructure, including, but not limited to, public transport, healthcare, and education, is assured and promoted.
DO 4	Accessible housing that positively contributes to the liveability and inclusiveness of neighbourhoods is assured and promoted.
DO 5	Accessible housing is suited to a range of incomes including households with low to moderate incomes.
DO 6	Accessible housing that enables ageing in place is assured and promoted.
DO 7	Accessible housing caters for a variety of household structures.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Division	
PO 1.1 Development comprising 10 or more dwellings / allotments incorporates accessible housing.	DTS/DPF 1.1 Development results in 0-9 additional allotments / dwellings.

PO 1.2 Development comprising 10 or more dwellings or residential allotments provides housing suited to a range of accessibility needs.	DTS/DPF 1.2 Development comprising 10 or more dwellings or residential allotments includes a minimum of 15% accessible housing that complies with the 'Gold level' of the Livable Housing Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia, except where: (a) Concessions or exemptions under the mandatory National Construction Code 2022 Livable Housing Design Standard apply to 15% or more dwellings or residential allotments, then 25% of remaining dwellings or residential allotments comply with the 'Gold level' of the Livable Housing Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia.
PO 1.3 Accessible housing is suited to a range of incomes including households with low to moderate incomes.	DTS/DPF 1.3 Affordable housing includes a minimum of 15% accessible housing that complies with the 'Gold level' of the Livable Housing Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia.
PO 1.4 Accessible housing is distributed throughout the development to avoid an overconcentration.	DTS/DPF 1.4 None are applicable.
Built Form and Character	
PO 2.1 Accessible housing is designed to complement the design and character of residential development within the locality.	DTS/DPF 2.1 None are applicable.
Movement and Car Parking	
PO 3.1 Sufficient accessible car parking is provided to meet the needs of occupants of accessible housing.	DTS/DPF 3.1 Dwellings constituting accessible housing are provided with accessible car parking of at least 1 car park per dwelling.

Procedural Matters (PM) – Referrals

The following table identifies classes of development / activities that require referral in this Overlay and the applicable referral body. It sets out the purpose of the referral as well as the relevant statutory reference from Schedule 9 of the Planning, Development and Infrastructure (General) Regulations 2017.

Class of Development / Activity	Referral Body	Purpose of Referral	Statutory Reference
None.	None.	None.	None.

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Wednesday, 15 November 2023 12:42:38 PM
Attachments: image001.gif
image002.gif
image003.jpg
RAA Submission to the GARP Discussion Paper 20231115.pdf

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

Good afternoon

Please find attached RAA's submission to the GARP Discussion Paper.

Kind regards

Ethan Gates
Manager - Policy

RAA Group
101 Richmond Road, Mile End SA 5031
| M [redacted] | raa.com.au

RAA acknowledges the Traditional Custodians of Countries throughout Australia and their connections to land, sea and community. We pay our respects to Elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

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Submission to the

Greater Adelaide Regional Plan

November 2023

Motor | Home | Travel

RAA

RAA at a glance

RAA

South Australia's largest
member-owned
organisation

Advocating for South Australians for
120 years

805k+
current members
(60% of SA adults)

630k+
South Australian homes and cars insured

1,200+
staff employed across SA

344k+
roadside rescues per year

60,000+
uses of the MyRAA app fuel feature per month

14,000+
solar panels installed per year

40,000+
Holidays booked per year

33,000+
school students educated on road safety each year

9,500+
child restraints fitted or checked each year

$874k+
per year invested in community grants and sponsorships

Foreword

RAA welcomes the opportunity to make a submission to the Greater Adelaide Regional Plan Discussion Paper.

As the state's largest member organisation representing over 805,000 South Australians and reaching into more than 70 per cent of households, we exist to make life easier for our members and the community.

For 120 years, RAA has been advocating on behalf of our members to help South Australians stay safe on our roads and travel around our great state. Today, our core business cuts across motor, home, travel, and energy, which puts RAA in a unique position to engage with the SA Government on the development of the GARP.

RAA supports a bigger, better South Australia that is safe, sustainable, and liveable. We believe strong population growth will spur economic activity and create more opportunities for young people. However, as our state grows towards two million people over the next decade, we also need to maintain its unique liveability.

Population growth will only support liveability when the infrastructure is developed in parallel. Housing developments, both greenfield and urban infill, must be supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibility and transparency for action.

Furthermore, the increase of natural disasters in recent years has highlighted the need to invest in disaster mitigation measures and more consciously consider the relationship between land use planning and extreme weather risk. As South Australia's leading personal lines insurer, RAA is committed to working with industry and governments to reduce the risk of natural disasters. Reducing risk will improve insurance affordability and avoid future financial costs to homeowners, businesses, governments, and communities.

The transition to electric vehicles will help decarbonise personal transport and change the way we fuel our vehicles and power our homes. The convergence of the home and car presents enormous opportunities and the GARP needs to be considerate of the additional energy demand and need for smart home infrastructure that will be required to support this transition.

In the following submission we address the key areas and questions posed in the Discussion Paper relevant to RAA members. In particular, we focus on what the GARP can do to ease cost of living through increased housing supply, reducing home energy bills, improving insurance affordability and lowering transport costs.

We also provide advice on what is needed for our road network, future mobility trends, electric vehicle uptake, and public and active transport infrastructure.

On behalf of our members, we thank you for the opportunity to provide a submission to the Discussion Paper.

RAA is buoyed by the Government's renewed approach to this important planning task. We are supportive of the Government's intention to plan for a high-growth scenario and look forward to ongoing engagement as the GARP is developed and implemented.

Emily Perry

General Manager,
RAA Community and Corporate Affairs

How should Adelaide grow?

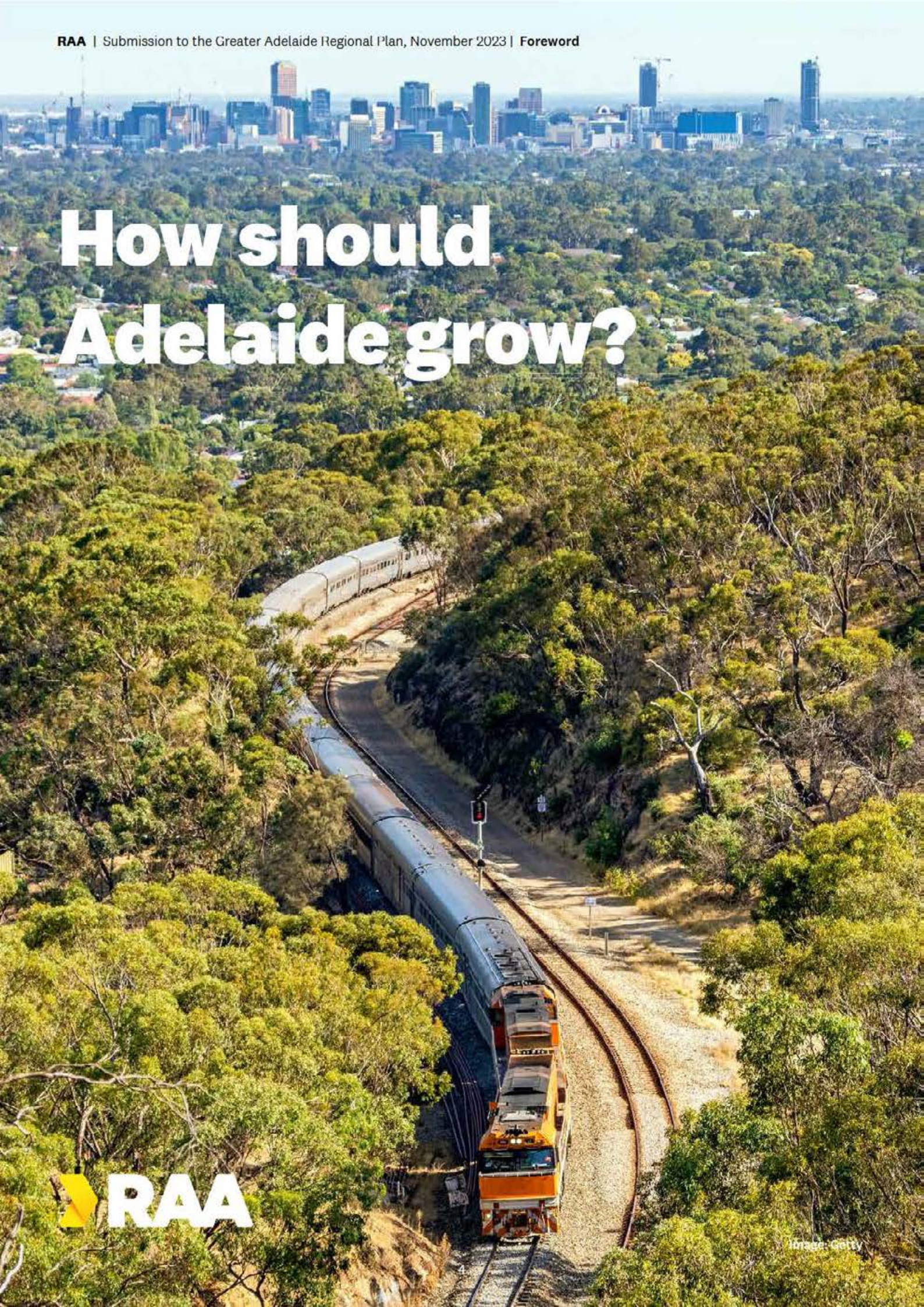

Image: Getty

Outcomes for Greater Adelaide

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

RAA supports the four outcomes identified in the Discussion Paper to guide the discussion about how Greater Adelaide should grow ('greener', 'equitable', 'strong economy', and 'choice of housing').

However, RAA believes the Government should consider aligning the outcomes of the GARP to the United Nations Sustainable Development Goals including those under SDG 11: 'Make cities and human settlements inclusive, safe, resilient and sustainable'. This will enable greater transparency and international benchmarking of outcomes. For example, goals that align with SDG 11 could include (but not be limited to) measurable and ambitious targets for:

- Proportion of population that has convenient access to public transport, by sex, age and persons with disabilities.
- Ratio of land consumption rate to population growth rate.
- Direct economic loss attributed to disasters in relation to global domestic product (GDP).

Recommendation 1

SA Government align outcomes for how Greater Adelaide should grow to the United Nations Sustainable Development Goals.

Outcomes for Greater Adelaide (continued)

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

RAA believes changing mobility systems will have a considerable impact on land use in coming years.

Electric vehicles

Electric vehicles are the future here and around the world and RAA believes South Australia should lead the nation in the transition to EVs to capitalise on our abundant supply of renewable energy and reduce motoring costs.

After a slow start, it is clear that Australia is now catching up to the rest of the world when it comes to EV adoption. EV sales have accelerated rapidly, with 3,538 sold in SA throughout 2023 (January to September), which is more than double the amount of EVs sold in all of 2022.[1]

The emergence of EVs presents significant opportunities to decarbonise personal transport and RAA is proud to be playing a part in supporting EV adoption by building 140 EV charging sites across the state, with support from a State Government grant.

Notwithstanding the immense opportunities of EV adoption, some challenges are emerging which are relevant to the GARP.

To support public EV charging, ongoing investment in the energy network is required to fill gaps and to increase capacity at high demand locations.

One of the key lessons to date from RAA's experience in installing public charging infrastructure is that parts of the network are not capable of hosting DC rapid and ultra-rapid EV chargers. Some regions, specifically the Limestone Coast and Yorke Peninsula, are particularly challenging. Others such as the Eyre Peninsula are relatively DC charger ready, although this can differ between towns and within sub-regions.

RAA has been advised that the network upgrades required to install DC chargers in some areas are simply not feasible. Network modifications carry very high costs and can take several years to implement. From the network service provider perspective there is no motivation to prioritise these upgrades over other competing priorities.

DC chargers are required to charge EV batteries in the lowest amount of time, addressing the main barriers to EV uptake – range anxiety and extended travel time. Ideally chargers should be built in areas that provide the greatest convenience to drivers; however, RAA believes that without intervention and scaling up, network capacity will limit where they may be located. This will create gaps in the public charging network that may be seen as barrier to EV uptake.

While public charging availability is critical to supporting EV uptake, most EV charging will occur in the home, which will create additional demand for electricity in residential areas.

Greenfield developments and urban infill must be considerate of the need to support home EV charging when determining the need for electricity infrastructure.

RAA believes that preparing new builds for smart EV charging should be a priority. This includes ensuring that buildings are Vehicle to Grid (V2G) and Vehicle to Home (V2H) ready to allow EV owners to export energy from their EV battery to power their home or to sell back to the grid.

In the near future, V2H and V2G technologies will provide flexible and dispatchable storage behind the meter. A September 2023 report by the Australian Energy Market Commission (AEMC) stated: "The Commission expects substantial new investment in EVs will increasingly

1. Federal Chamber of Automotive Industries, VFACTS

Outcomes for Greater Adelaide (continued)

drive two-way and controllable power transfers between individual consumers and the broader power grid."[2]

This interaction with the grid creates a need to ensure appropriate industry standards for charging equipment and inverters. The Energy Security Board has recently consulted on this matter, resulting in strong stakeholder support for setting of minimum equipment standards for chargers at a national level, and a strong preference for use of international standards.[3]

The AEMC is supportive of consistent national technical standards for Consumer Energy Resources (like EV batteries) and have recommended energy ministers lead the development of a national regulatory framework for technical standards.[4]

Recommendation 2

SA Government works with the Australian Government, state/territory governments, industry groups, standards bodies, and equipment manufacturers to establish nationally consistent standards for Vehicle to Home and Vehicle to Grid bi-directional charging.

Energy

Where possible, the GARP should be considerate of opportunities to service a growing population using our existing energy infrastructure, to avoid additional investment where possible.

Through greater uptake of time of use tariffs, there is potential to shift electricity demand to off-peak periods, therefore easing the need to build more poles, wires, substations, and other infrastructure to satisfy peak demand.

A key to shifting South Australians to these tariffs is encouraging greater uptake of smart meters among existing households. While new builds have a smart meter installed by default – there is a need for a 'critical mass' of smart meters to encourage energy retailers to develop innovative products – meaning that established homes need to be encouraged and incentivised to have a smart meter installed.

The installation of smart meters can be expensive for consumers where upgrades to switchboards are required. This a key barrier to smart meter adoption and has deterred many from pursuing solar panel installations. During the 2023 financial year, approximately 15% of RAA solar quotes that did not proceed cited switchboard upgrade costs as a key reason.

RAA understands the cost to install smart meters is generally passed on to consumers by retailers, with costs spread across their customer base. RAA believes if switchboard upgrades are required to install a smart meter, these costs should be considered part of the smart meter installation and should not burden individual households with upfront costs.

The GARP should complement the Government's recently announced energy transition policy (in development) and, in line with the 'greener' GARP

2. *Final Report - Review into consumer energy resources technical standards (RCERTS) (aemc.gov.au), page i*
3. *Microsoft Word - 5.1 EV Smart charging - Response to consultation - December 2022.docx (datocms-assets.com), page 6-7*
4. *Final Report - Review into consumer energy resources technical standards (RCERTS) (aemc.gov.au), page ix*

Outcomes for Greater Adelaide (continued)

outcome, population growth areas in Greater Adelaide should seek to capitalise on community-level renewable energy schemes, such as Virtual Power Plants and community batteries.

Recommendation 3

SA Government take action to create a smart home ecosystem in South Australia through:

- Increasing smart meter uptake in established homes by ensuring necessary switchboard upgrades are installed at no upfront cost to the household.
- Further Government investment and expansion of community-level energy programs such as incentives for rooftop solar PV and home batteries, expanding Virtual Power Plants and installing community batteries in new developments.

Micromobility

RAA supports the use of e-scooters in SA as they can connect people with public transport on the first/last mile of journeys, improving accessibility to trains, buses and trams. The uptake of micromobility devices has the potential to replace cars for short or medium trips, contributing to reduced traffic. Also, as these devices are powered by rechargeable batteries, they can also assist in the decarbonisation of transport and contribute to a cleaner environment for the region.

In April-May 2023, SA Government sought consultation on laws for micromobility devices like e-scooters. To date there has been no decision made on the legality of privately owned e-scooters on public land. This is problematic from a safety perspective - according to our research 22% of RAA members believe that e-scooters are already legal to ride on public land.[5]

Designing an appropriate regulatory framework and implementing a comprehensive education and enforcement regime is important to ensure safe operation of these devices for all road and footpath users.

Recommendation 4

Should e-scooter use on public land be made legal, supported by a safest practice legal framework, the SA Government investigate and encourage investment in additional off-road paths to accommodate and encourage e-scooter use, as part of a broader plan to increase cycling and walking participation.

5. RAA Internal Research, May 2023

Outcomes for Greater Adelaide (continued)

Car sharing

RAA encourages the Government to consider car sharing an emerging trend that may impact land use in the Greater Adelaide region in the near future.

Research has shown that car share schemes can reduce the need for personal car ownership, with each car sharing vehicle removing between 7 and 13 private vehicles from the road. Vehicle Kilometres Travelled (VKT) also reduce for participants of car share schemes, with North American studies finding that VKT dropped between 7.6% and 80%. Research looking at the impacts of car sharing in North America has consistently shown it to reduce private vehicle use and ownership, while supporting sustainable modes of transportation (public transport, cycling, and walking).[6]

Car sharing may have the following implications for the GARP:

- Car sharing is a useful way to reduce parking demand for apartment living – a number of new apartments being built across the country have zero or less than one park per apartment, either within the building or nearby.
- Car sharing also helps with street space where new homes have reduced frontages – e.g., one old home may be knocked down with three new houses in its place, but the street space now needs to accommodate three homeowners instead of one.
- Car sharing (along with other forms of shared mobility) strongly complements public transport, which has the overall effect of driving higher patronage.
- More data and information sharing by shared mobility operators can help Councils and Governments better plan routes and infrastructure.

Connected and autonomous vehicles

RAA believes the SA Government should actively monitor developments in connected and autonomous vehicle technology, as innovation in personal vehicles and public transport can potentially have implications for the state's transport planning and land use. For example, over the long term, when fully autonomous vehicles exist – car sharing of autonomous vehicles could dramatically reduce parking demand. Connected vehicles may also travel more efficiently on roads and reduce the need for further development. These technologies may also require alternative road design features such as sensors.

RAA has considerable expertise in future mobility, and we look forward to working with Government to accommodate new technologies as they develop.

6. Shaw, M. Twenty Years of Car Sharing: A case study on the City of Vancouver's role in the growth of car sharing in Vancouver, Page 22

A greener, wilder and climate resilient environment

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

RAA is supportive of the GARP outcome of a greener, wilder and climate resilient Adelaide.

The need to take a multi-faceted approach to achieving this outcome is clear. There is a need to decarbonise transport through greater uptake of walking and cycling, as well as transitioning public transport to zero emissions, which we note is already underway. Already, South Australia is a leader in renewable energy generation; however, more can be done to decarbonise homes and we support the need for the GARP to identify opportunities for community energy generation and battery schemes at land division stage.

It is encouraging to see a strong focus on flood protection and disaster management in the Discussion Paper. RAA strongly encourages SA Government to maintain and elevate these elements in the GARP.

The increase of natural disasters and higher insurance costs has highlighted the need to reduce risk by investing in disaster mitigation measures and more consciously considering the relationship between land use planning and extreme weather risk.

The benefits of investing in disaster mitigation measures is highlighted by research commissioned by the Insurance Council, which found that a five-year program of resilience measures costing approximately $2 billion could reduce costs to governments and households by more than $19 billion by 2050 — a nearly tenfold return on investment.

RAA has welcomed recent disaster mitigation investments from the Federal Government, including the $1 billion Disaster Ready Fund, announced in October 2022. RAA believes this can go further and supports calls from the Insurance Council to move disaster resilience funding to a 10-year rolling program and for state and territory governments to match funding.

Disaster resilience funding could be used for measures to reduce risk to homes, such as community level flood mitigation (such as along the Gawler River), flood levees and home retrofits. Funding could also be used for buy-back schemes for those living in extreme risk areas, as seen in other states. Such community resilience measures can further reduce flood risk to complement changes to planning and building codes.

The insurance industry is best placed to work with government and developers on ensuring new homes are not at adverse risk to floods, fires or other disasters. To this end, as South Australia's leading personal lines insurer, RAA is committed to working with industry and governments to help influence these public policy settings to reduce pressure on insurance premiums and avoid future financial costs to homeowners, businesses, governments, and communities.

Recommendation 5

Prior to completing the GARP, SA Government conduct targeted consultation with the insurance industry to better understand natural disaster risk in greenfield growth investigation areas. Where these areas are at adverse risk to floods or fires, alternative sites should be identified and/or development should only occur if risks can be appropriately mitigated.

This could include minimum building heights, the use of resilient construction materials or community mitigation options, such as levees.

A more equitable and socially cohesive place

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

RAA is encouraged by the Government's focus on living locally and by identifying the need to further develop along public transport corridors.

RAA strongly supports increased investment in public transport in South Australia. An attractive and convenient public transport system can reduce carbon emissions and road congestion by encouraging people to reduce their reliance on private car use. It can also service the mobility needs of those unable to drive themselves, including children, older people, people with disability, people in financial hardship, and visitors such as tourists.

Unfortunately, use and satisfaction of public transport in South Australia is consistently poor compared to other mainland states. A 2021 Productivity Commission report on Public Transport Pricing found that South Australia has the lowest proportion of work trips that involve more than one mode of PT, with 5.5% of trips, compared to 21.2% of trips in Perth (highest). According to Department for Infrastructure and Transport data, boardings are yet to recover to pre-COVID19 levels: Boardings for April to June 2023 were 15.9 million, compared to 19.4 million in April to June 2019 – a fall of 18%.

Furthermore, planning for public transport in new developments has not been done well in the recent past—adding to car dependency. For example, residents at Mount Barker that travel into Adelaide have few public transport options resulting in increased congestion on the South Eastern Freeway.

Public transport should be a consideration at the beginning of the investigation and planning stage of any future housing developments. This is particularly important for rail, where it is essential to quarantine land for a rail corridor from the outset. RAA supported the Government's decision to preserve land for a future rail

A more equitable and socially cohesive place (continued)

extension to Aldinga and supports preserving a corridor to extend the Gawler rail line to Roseworthy and further north to Freeling.

In 2022, RAA engaged the Legislative Council Select Committee on Public and Active Transport, making a submission and presentation at Parliament House. RAA believes the Government should conduct a holistic review of the Adelaide Metro network to identify:

- Improvements to Adelaide Metro network bus routes to better service business and education hubs and areas of interest outside of Adelaide CBD.
- Adelaide Hills to Greater Adelaide bus service improvements including priority for Glen Osmond Road to enhance service efficiency and reliability.
- Improvements to bus scheduling and stop locations, aimed at increasing service frequency and speed of travel, while maintaining adequate service coverage with consideration for vulnerable users.
- Ways to improve public confidence in the cleanliness and security on board public transport and at stops and stations.
- Identify strategic locations to install indented bus stops, priority bus lanes and traffic signals and new Park 'n' Ride facilities.
- Investigate reasons for low train patronage compared to other states and develop next steps to deliver service improvements of the train network, including optimising bus and tram services to better connect to trains and investigating options to increase service frequency of trains.

These recommendations were informed by research conducted by RAA which included survey responses from 1,320 South Australians, with many responses commenting on a lack of service options for their main destinations.

The development of the GARP provides the perfect opportunity to conduct this review and implement changes for an enhanced public transport system.

Recommendation 6

SA Government conduct a holistic review of Adelaide's public transport network to optimise coverage and increase service frequency for the current population – with a plan to develop the network needed to support the future population and layout of the region.

Sustainable transport infrastructure funding

Accommodating an additional 300,000 homes will require investment in the transport system, including roads, public transport and active transport infrastructure. The projects required to make these improvements will likely require co-funding from the Australian Government.

RAA wishes to highlight that one of the main sources of road-related revenue – fuel excise – is shrinking as more EVs and fuel-efficient vehicles replace older less efficient models. Over time, this means those that can only afford to drive older less fuel-efficient cars are left paying fuel excise.

For more than a decade, several tax reviews and reports from the Productivity Commission, Infrastructure Australia, and transport advocates have highlighted the problem with fuel excise and called for a fairer and more sustainable system.

In recent years, various state and territory government have introduced state-based charges on EVs. However, in October 2023, the High Court of Australia found that by majority s 7(1) of the Zero and Low Emission Vehicle Distance-based Charge Act 2021 (Vic) ("the ZLEV Charge Act") is invalid on the basis that it imposes a duty of excise within the meaning of s 90 of the Constitution. With this decision, States are not able to collect a road user charge.

With this decision, the Australian Government must work with states and territories to develop a nationally consistent approach. This should also provide an opportunity to address the inequity in the fuel excise system.

RAA supports replacing fuel excise with a nationally consistent distance-based charge on all light vehicles, regardless of the type of car they drive, to ensure there is a sustainable revenue model to fund transport infrastructure and maintain safe roads into the future.

This would ensure that:

- Transport infrastructure funding is not reliant on fuel excise revenue which is declining with the adoption of low emission and electric vehicles.
- There is a fairer, equitable, and transparent funding system.
- The charge is not considered or misunderstood as a tax just on EVs.
- All motorists regardless of vehicle contribute towards the cost of building and maintaining a safe and efficient transport network.

The application of a distance-based charge should be introduced in way that does not disincentivise adoption of EVs. For example, a lower rate and/or incentives could be applied to EVs to compensate for the charge. All revenue from the charge should be directed exclusively to land transport and electric vehicle infrastructure.

A strong economy built on a smarter, cleaner, regenerative future

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

RAA encourages the Government to engage industry to understand the land use and urban design needs of knowledge-rich employers.

In 2023, the Committee for Adelaide produced its first 'Benchmarking Adelaide' report which compares Adelaide against a group of global peer cities across a range of metrics. This research found:

"Across most sectoral breakdowns Adelaide has a smaller share of jobs in high wage and knowledge-rich sectors. It is 5th of 6 peers for the share of jobs in business services, design and scientific R&D (7.1% in Adelaide compared to 9% on average). Such international figures reflect the need identified for more scientists, computer programmers, cyber security architects, and engineers, and for more variety of high value exports (South Australia Productivity Commission)."[7]

The report continues:

"Efficiency of Adelaide's infrastructure and land-use is likely to become a bigger shaper of the city's future productivity performance, as the city shifts into sectors that rely on speed, knowledge and an urban labour market."[8]

The Government should review and consider the impact of initiatives like MAB at Tonsley and Lot Fourteen in the CBD and consider whether further innovation hubs in strategic locations can contribute to a smarter future for Adelaide's economy.

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7. CFA-Benchmarking-Report_FINAL-DIGITAL_compressed-1.pdf (committeeforadelaide.org.au), page 25

8. CFA Benchmarking Report, page 26

A greater choice of housing in the right places

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

RAA believes that the Discussion Paper does well to acknowledge the importance of a mix of housing types and locations. Our research demonstrates that the majority prefer free-standing home. However, people of different ages, and different family structures will have an appetite for different housing types – therefore a mix is necessary.

In late 2022 RAA asked its members about housing choice. The desire to live in a freestanding home was dominant, with 86% of our members indicating a preference for this housing configuration. However, the importance of housing options was clear when taking a deeper look at the survey results.

Preferred housing type and location varies by age, with younger members displaying a preference for free-standing homes and older members – for example those over 60 – showing a greater appetite for single story units. For families with young children, a free-standing home is the clear choice, but for 13% of families with teenagers, a townhouse was most desirable, compared to only 4% of families with children under 13-years old.[9]

RAA encourages the Government to explore policy options for providing greater choice of housing for South Australians. Other states have implemented stamp duty concessions or exemptions for pensioners looking to downsize. For example, pensioners looking to downsize and purchase a home for less than a specified amount could be eligible for a stamp duty exemption. A similar scheme in SA may increase housing supply and choice of housing.

RAA supports moving away from an infill vs greenfield target ratio, as was applied in previous 30-year Plan iterations. Instead, the Government should be looking to maximise the available land to build the residences that people want to live in, and this requires a mixture of urban infill, greenfield and satellite city development.

Recommendation 7

SA Government conduct ongoing research into housing choice – planning strategy and implementation should then be aligned with this research, to ensure that South Australians have access to their preferred housing type as they move through different life stages.

9. RAA internal research, January 2023

The urban form to bring our vision to life

What neighbourhood features enhance living and working locally?

The ultimate goal of living locally is to establish 20-minute neighbourhoods, where individuals can conveniently fulfill the majority of their daily requirements through a short 20-minute walk, bike ride, or public transport trip from their residences.

A well-connected and pedestrian-friendly neighbourhood stands as a robust solution to address various urban and environmental challenges. The presence of bike paths, footpaths, and accessible public transport not only fosters healthier lifestyles but also enhances connectivity to essential destinations.

A clearly defined transport network developed using Movement and Place thinking is important. For example, development immediately adjacent key distributor roads (with high "movement" function) should be limited to allow safe movement of all forms of transport, whilst precincts and local streets (with high "place" function) should facilitate a safe and accessible place for all users.

RAA has long called for greater commitment from the Government in developing the state's cycling and walking infrastructure. The recent "Benchmarking Adelaide" report produced by the Committee for Adelaide benchmarked Greater Adelaide against 19 international peer cities. The report found: "Adelaide ranks last among peers for the quality of its bike network, and in the bottom 3rd among 170 American and European cities... it also ranks last among peers for access to people, jobs and educational institutions and shopping areas through low-stress biking routes".[10]

The GARP presents a real opportunity to implement an active transport strategy and action plan, backed by dedicated infrastructure funding of at least $10m annually. By making short/medium trips safer and more efficient to walk, cycle or use e-scooters, the Government can create a landscape that is supportive of living locally.

We believe the following should be prioritised:

1. Off-road cycle, pedestrian, and shared use paths
2. Greater connectivity of on-road cycle paths
3. Physical barriers between cyclists and motorists

RAA has now conducted two 'Risky Rides' surveys, with the most recent report published in March 2023.[11] Our latest survey received 761 nominations from concerned cyclists and motorists that identified gaps in cycling infrastructure, resulting in the following top priorities for cycling infrastructure investment:

- Provision of new shared paths adjacent to roadways in the Adelaide Park Lands has the potential to reduce reliance on arterial road corridors. Shared paths adjacent Greenhill Road and Main North Road were the most highly raised suggestions in the 2022 Risky Rides survey. Specifically, a safer cycling route is required along Greenhill Road, from ANZAC Highway to Fullarton Road and RAA believes a new off-road shared use path is the best option.
- Within Adelaide, completion of the next stage of the Frome Street Bikeway between Rundle Street and North Terrace must be a high priority. Furthermore, a high number of nominations for east-west roads through the city indicates that there is still high demand for the provision of an East-West Bikeway to provide safer movements and better connectivity between the east and west of Adelaide.
- Ultimate completion of the North-South Corridor will deliver a major change in movement in and around Adelaide. Improved cycling connectivity must be delivered through the delivery of the North-South Corridor. Whilst the current South Road surface road has minimal provision for cyclists and is not a popular cycling route, it provides high connectivity with other cycling routes, both on-road in the east-west direction between Adelaide and the coastline, and with popular cycle corridors such as the Marino Rocks Greenway, Mike Turtur Bikeway, Westside Bikeway and River Torrens Linear Park.

10. CFA-Benchmarking-Report_FINAL-DIGITAL_compressed-1.pdf (committeeforadelaide.org.au), page 51
11. Risky Rides – Advocating for safe roads and paths for cyclists | RAA

The urban form to bring our vision to life (continued)

- Due to metropolitan Adelaide's grid-like structure, "diagonal" corridors that bisect the grid such as North East Road, Lower North East Road/Payneham Road, Port Road, Anzac Highway and Glen Osmond Road will always provide travel time and distance savings for cyclists commuting to and from the city when compared to alternative local-street bikeways. However, these corridors vary greatly in terms of the cycling infrastructure they provide. Therefore, any future planning needs to consider the primary function of these roads in Adelaide's road network, ensuring that cyclist infrastructure is a key consideration. Off-road bikeways adjacent these corridors vary significantly in infrastructure, and with further investment and robust planning, have the potential to provide competitive alternatives to on-road cycling in terms of total commute time.

Further, availability of community and local transport options, such as the Keoride on-demand bus in Mount Barker is important which provides an effective and highly utilised first and last-mile connectivity to the Mount Barker interchange. A reliable and convenient public transport system makes it easier for residents to commute and access essential services within and beyond the neighbourhood.

Access to car-parking is a regular concern raised by communities, especially in brownfields areas where urban infill occurs through property subdivisions. Many within these communities feel entitled to an on-street car park, whilst garage space is often utilised for storage or as an extension of the home to facilitate a home office, gym, or entertaining room. On-street parking demand should be a consideration for developments that lack adequate parking facilities. On-street parks should consider the requirements of typical vehicle buying preferences, for example EVs are often wider than many Internal Combustion Engine vehicle models.

Recommendation 8

Alongside the GARP, SA Government should develop, and fund the implementation of, an active transport strategy and action plan to support greater uptake of cycling, walking and micromobility.

Comments on infrastructure and services

RAA supports population growth and is buoyed by the Government's intention to plan for a high growth scenario. In the past, infrastructure has not always kept pace with population growth and housing developments, with issues in Mount Barker being well-documented. There are also flow on issues with the 'middle infrastructure', where developments create congestion on roads several kilometres away.

In early 2023, RAA surveyed members to understand their views on population growth. While many opposed population growth, the main issue was that the infrastructure was not keeping pace. If we peel back the layers, very few people have an issue with an increasing birth rate or attracting people to move to SA. Their concern arises if that growth compromises their quality of life – whether that be through more congested roads, greater demand on services, and more competition for jobs.

RAA strongly believes that the GARP must ensure housing developments, both greenfield and infill, are supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibilities and transparency for action.

RAA is hopeful the establishment of the Housing Infrastructure Planning and Development Unit will help ensure the right infrastructure is in place to support future growth.

If infrastructure doesn't keep pace with growth, there will be significant implications for safety, productivity and liveability.

Where should Adelaide grow?

Greenfield and satellite city growth

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

As a travel provider, RAA is deeply aware of the tourism appeal of Victor Harbor and the Riverland, for which Murray Bridge serves as an important hub. Should government target these locations for development to accommodate a growing population – we strongly support protecting the tourism characteristics of these areas that attract travellers from within SA, interstate and overseas. For example, among domestic tourists, there were 1.4 million trips to The Murray and 834,000 trips to the Fleurieu Peninsula in the year ending June 2023.[14]

Development should not diminish the appeal of the natural environment or detract from attractions or accommodation for tourists.

Recommendation 9

SA Government ensures that Victor Harbor and Murray Bridge areas maintain their unique tourism characteristics with any development plans.

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

Ultimately the benefit of greenfield development is the increase in supply of freestanding larger homes which are most desirable for South Australians.

In principle, in all growth areas, it is important that the required road and access infrastructure improvements keep pace with the growth in population, or preferably are undertaken prior to the completion of large urban estates.

The Government can learn from experiences where a lag in road development has negatively impacted residents, including in Mount Barker (Heysen Boulevard) and residential growth areas (Angle Vale, Playford Alive, Blakes Crossing, Playford North Extension within the City of Playford - Curtis Road, Heaslip Road).

RAA suggests that the 'living locally' concept is particularly important for greenfield developments in outer areas. Typically transport costs are higher for people living in the outer suburbs. Therefore, it is important that greenfield sites be developed with consideration of urban centres that provide employment opportunities as well as services such as shopping and health care.

Movement and place thinking should be integrated into the further development of all urban precincts. This thinking recognises that streets can serve as key destinations in their own right and is useful for the practical implementation of transport planning objectives.

Land available for greenfield developments is often at higher risk of floods or fires. RAA recommends that the Government work with the insurance industry to understand the risks and to ensure that new homes and infrastructure are built to a higher level of resilience where needed.

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12. Domestic tourism results | Tourism Research Australia

Comments on proposed greenfield and satellite city investigation areas

As stated previously, RAA strongly believes that the GARP must ensure housing developments, both greenfield and infill, are supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibility and transparency for action.

RAA makes the following comments around what transport infrastructure investments would need to be made in proposed greenfield investigation areas.

North-western spine

The GARP Discussion paper notes the potential for additional housing along the southern end of the Port Wakefield Highway. Safety along the Port Wakefield Highway is of concern, and improvements to roadside barriers and intersections are highly important, given the current 110km/h speed limit. RAA is particularly concerned about safety for vehicles turning right from Port Wakefield Highway, Mallala Road or Brooks Road.

The recently signalised intersection at Angle Vale Road/Riverlea Boulevard is the only such intersection between Port Augusta and departing the North-South corridor near the city. Should this intersection be grade separated, it would be safer and promote the free flow of traffic, akin to a freeway interchange.

Depending on the proposed development in Two Wells, primary access to town (Mallala Road or Brooks Road) should be upgraded, and potentially grade separated also (depending on projected population).

Increasing urban development in Virginia is also increasing traffic at the Old Port Wakefield Road intersection, and investigation into safety treatments at this location should also be undertaken.

RAA supports extending the Gawler rail line to Roseworthy along the existing disused rail corridor, noting the future possibility of extending this further north to Freeling.

North-eastern spine (Kudla to Evanston Gardens)

Importantly, these areas are adjacent the Gawler Line and are therefore already well connected to Adelaide by public transport. Continued investment in the North-South Corridor also means this area is now a 35-minute drive (approximately) from Adelaide. As development accelerates, access to these train stations is important.

Eastern spine from Callington to Murray Bridge

Major growth in the Callington/Murray Bridge area (combined with Mt Barker/Nairne and Strathalbyn) will put added pressure on the South Eastern Freeway without providing significant opportunities for local employment and other amenities.

This would provide more justification for an Adelaide – Murray Bridge rail line via Mt Barker and Callington. However, a train trip from Murray Bridge to Adelaide via Mt Barker, Blackwood/Belair/Mitcham etc probably wouldn't compete well from a travel time perspective, compared to on-road options (bus/private vehicle).

RAA have previously recommended Murray Bridge as a possible trial area for on-demand bus transport to improve local accessibility.

Southern spine and opportunities around Victor Harbor and Goolwa

Road upgrades are needed, including to Main South Road between the Southern Expressway and Victor Harbor Road (we note that a planning study is currently underway).

The Government should also be looking to duplicate Victor Harbor Road between McLaren Vale and Mount Compass (A corridor study has been recently undertaken, with RAA providing input in 2021).

Additional upgrades to the Victor Harbor Road and Goolwa Road corridors will be needed to improve safety and efficiency/capacity between Victor Harbor/Goolwa and Mount Compass.

Comments on proposed greenfield and satellite city investigation areas

Alexandrina Road between Goolwa and Strathalbyn, and Port Elliot Road between Victor Harbor and Goolwa may also require upgrades because of significant population increases around Goolwa.

RAA have previously recommended Victor Harbor - Goolwa as a possible trial area for on-demand bus transport to improve local accessibility and the need for an appropriate public transport solution is increased with a growing population.

RAA encourages Government to investigate the following:

- Would on-demand transport be effective in Greenfield investigation areas?
- Will there be safe and dedicated access to the train stations for active transport?

Recommendation 10

SA Government consider the following at the commencement of investigating greenfield areas:

- the capacity, connectivity and safety of roads and intersections
- availability of efficient public transport; and
- connectivity for active transport.

Government should then commence improvements and upgrades at the early stages to ensure new residents to these areas are not unfairly disadvantaged.

Urban infill growth

Where is the next generation of strategic infill sites?

The Discussion Paper poses a need to investigate strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth. RAA would like to offer the following comments regarding these areas.

Access to these centres is often primarily by motor vehicle, and they're not always well served by active modes of transport, or even public transport – despite being a hub for public transport out of the urban activity centre. For shopping trips, many will prefer to take a private vehicle to avoid walking, cycling or taking public transport with shopping. There is often demand for urban infill around these centres (e.g. within walking distance of the major public transport hub) and planning codes should allow for denser style living, where it is not essential to own a car to get around, and car sharing schemes may provide sufficient access to a motor vehicle for residents.

Existing centres are often managed by large retail groups (e.g. Westfield), and there are concerns about users parking in retail car parks to then use public transport or other nearby facilities – and leaving insufficient parking for visitors to the centre. For example, parking fines are regularly issued to commuters at Tea Tree Plaza in Modbury who use the shopping centre car park to access the public transport interchange. This same centre saw controversy when the car park was blocked off in the mornings to prevent staff and visitors to Modbury Hospital from using the shopping centre car park.

Urban space and urban greening

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

A significant amount of open space will be returned to the community upon completion of the North South Corridor, and provision of a continuous, safe and separated cycle corridor. As stated previously, South Road currently is not a popular cycle corridor but does link in with several key corridors e.g. West Side Bikeway, Mike Turtur Bikeway, Marino Rocks Greenway.

There is room for improvement in off road corridors in metropolitan Adelaide in terms of accessibility to commuter cyclists, with many opting to cycle on arterial roads (the less safe option) instead. Bikeways along local streets can provide a safer riding environment, but often come at the expense of increased travel time. Some direct corridors, including the Mike Turtur Bikeway and the Outer Harbor Greenway, could be enhanced to give path users continuous travel across local streets. Others such as the River Torrens Linear Park Path may have capacity for dedicated cycleways.

Safe routes need to be openly and easily available to potential users, and improvements to wayfinding and delineation of the routes themselves are also needed.

Further comments

The Discussion Paper is missing any mention of road safety and does not mention the state or national road safety strategies. Many of the key transport/road elements of the GARP should be considerate of state and national road safety strategies and action plans to ensure that the targets can be met. Specifically – if aiming for zero lives lost by 2050, the impact of urban development on the metro fringe area on the safety of the road network should be considered.

RAA supports and encourages the roll out of electric and hydrogen powered buses and trains to reduce the carbon footprint of the public transport system and further offset emissions for those who choose public transport as an alternative to driving privately owned vehicles.

Electrification of the Gawler and Seaford rail lines is welcomed, and opportunities for the Outer Harbour, Grange and Belair lines must be explored as diesel trains approach the end of their service life. We note that Government is exploring hybrids and hydrogen powered options and this should continue.

New urban developments must be accessible via public transport and RAA strongly supports extension of the Seaford line to Aldinga, and extension of the Gawler rail line to Roseworthy. Investigation into the provision of public transport is required at new and future developments including Riverlea (Buckland Park), Dry Creek and Concordia.

Submission to the Greater Adelaide Regional Plan

November 2023

Motor | Home | Travel

RAA

DTI:PlanSA Submissions

From: Maria Zotti <[redacted]>
Sent: Monday, 6 November 2023 1:50 PM
To: DTI:Plan SA; DTI:PlanSA Submissions
Cc: DTI:Plan SA; Philip Roetman; Naomi Doolette; Diane Salvi; Herd, Jon; Kat Ryan; [redacted]; Joshua Bowen; James Kelly; Peters, James (DEW); Whitcher, Sarah (DEW); Andrian Wiguna; jen@stjack.com.au; Jeremy Miller; Stefan Caddy-Retalic; Andrew Nesbitt (LGA)
Subject: Resilient East Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Resilient East Submission Greater Adelaide Regional Plan Discussion Paper.pdf

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

Dear Growth Management Team

Thank you for the opportunity to provide a submission to the Greater Adelaide Regional Plan Discussion Paper. Please find attached the Resilient East Submission.

In Summary, the Resilient East Steering Committee supports the four themes highlighted in the Discussion paper and believes that the themes have the potential to create a more climate resilient and sustainable future. However, they will require significant changes to business-as-usual practices in order to be effective and to enable climate safe housing and communities and liveable cities.

Kind regards

Maria Zotti

Chair of Resilient East

Maria Zotti
Manager Environment & Sustainability Services

T [redacted]
E [redacted]
W www.campbelltown.sa.gov.au

CAMPBELLTOWN CITY COUNCIL *A safe, sustainable, vibrant Community*

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RESILIENT EAST

Climate Ready Eastern Adelaide

6 November 2023

Growth Management Team,
Planning and Land Use Services
Department for Trade and Investment
Via email: plansasubmissions@ sa.gov.au

Submission – Greater Adelaide Regional Plan Discussion Paper

Resilient East appreciates the opportunity to contribute to the Greater Adelaide Regional Plan Discussion Paper to help inform the future of our region to 2051 and beyond.

Resilient East is a partnership between the Campbelltown City Council, the Cities of Adelaide, Burnside, Norwood Payneham & St Peters, Prospect, Tea Tree Gully, Unley and the Town of Walkerville and the South Australian Government, a regional alliance tackling climate change. Resilient East seeks to ensure the eastern region remains a vibrant, desirable and productive place to live, work and visit, and that our businesses, communities and environments can respond positively to the challenges and opportunities presented by a changing climate.

This submission does not reflect formal Council consideration by any of the constituent Councils. This input is intended, however, to complement the specific planning feedback from participating Councils and provide a perspective from regional climate change adaptation practitioners.

Resilient East also echo comments from the Regional Climate Partnerships (RCPs) and acknowledge the combined input to create this submission. The RCPs are made up of Resilient East, Adapt West, Resilient Hills and Coasts and Resilient South, focused on delivering practical action to strengthen the climate resilience of their communities, economies and natural and built environments. The Regional Climate Partnerships were founded recognising that climate impacts are not limited to individual jurisdictions and that a partnership between government service providers is required in order to achieve the necessary actions to effectively respond to climate threats.

Resilient East sees the Greater Adelaide Regional Plan as a key spatial plan to enable a resilient and climate ready future for South Australia.

Resilient East knows first-hand how powerful these plans are, for example the inclusion of the greening target in the current 30 Year Plan was pivotal to a considerable amount of collective action, strategic urban forest planning and urban greening improvements over the last 5 years.

In Summary, the Resilient East Steering Committee supports the four themes highlighted in the Discussion Paper and believe the themes have the potential to create a more climate resilient and sustainable future. However, they will require substantial changes to business-as-usual practices in order to be effective.

What we Build

✓ Consideration of the State Government's commitment to a **Net Zero** future by 2050 is a critical factor to be addressed in the Greater Adelaide Regional Plan, providing for key planning outcomes to enable this transition.

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- ✓ Achieving "a **greener**, wilder and climate resilient environment" is supported, but the actions outlined in the Discussion Paper are insufficient to achieve this.
- ✓ For **energy efficiency** to have maximum return on investment, it needs to be supported at all stages within the planning system, beyond a simple building rules consent process.
- ✓ It is unlikely that Adelaide will become **less car-dependant** in the next three decades without substantial infrastructure investment and cultural change programs.

Where we Build

- ✓ We need to build in **resilience** for new neighbourhoods. Decision-makers considering the location of new neighbourhoods (strategic infill and greenfields), need to consider the climate conditions a century into the future, to avoid future **hazard risk**.
- ✓ **Living locally** is a proven sustainability principle but conflicts with the principles of increased urban sprawl and low-medium density development.
- ✓ Urban infill is unavoidable, and there are ways to do it better. One of the best ways to reduce a **carbon footprint** is to live in a smaller house close to other people.

Resilient East acknowledges the planning system for Greater Adelaide is a complex issue and is committed to working together to grow a resilient city for everyone. Below is more detailed discussion to Resilient East's key points for further consideration.

Discussion

The Discussion Paper highlights key themes for a positive and resilient future, these being:

a. A greener, wilder and climate resilient environment
b. A more equitable and socially-cohesive place
c. A strong economy built on a smarter, cleaner, regenerative future
d. A greater choice of housing in the right places.

While Resilient East supports the inclusion of themes that create a more climate resilient and sustainable Regional Plan, continuing business-as-usual in planning policies and systems will not create this future and will most likely lead to negative outcomes such as further canopy loss and hazards. The previous 30-year Plan for Greater Adelaide (2017 update) set the foundation for the current State Planning Policies and associated objectives in the Planning and Design Code. The current State Planning Policies (SPP) related to climate resilience include:

- Design Quality 2.3 'The development of environmentally sustainable buildings and places by applying Water Sensitive Urban Design and energy efficiency design solutions.'
- Climate Change 5.4 'Mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure and other design responses.'

For climate ready buildings and sustainable development outcomes, the associated performance objectives (PO4.1-4.3) in the Planning and Design Code are the single source of planning policy for assessing development applications across SA.

However, it is well recognised that there is a large and clear gap between these policy commitments and implementation mechanisms, and therefore, the results are not being seen on-ground. So, while the previous Regional Plan set the policy framework and targets that filtered into other parts of government, on-ground action is still lagging behind. This new Regional Plan needs to be different and be more specific about the key mechanisms that will enable this change to occur.

This change needs to occur quickly. In the face of a rapidly changing climate, and failing planning policies, Resilient East cares about:

a. A carbon-positive future (and the role of planning in achieving Net Zero emissions),
b. Cost of living (a focus on operational life-cycle costs for more efficient homes, not just the up-front building cost),
c. Insurability (Where we build, and what we build),
d. Health and wellbeing (are homes protecting and promoting good health in the face of extreme weather?), and

e. Not creating new risks (because there is enough legacy risk to manage now).

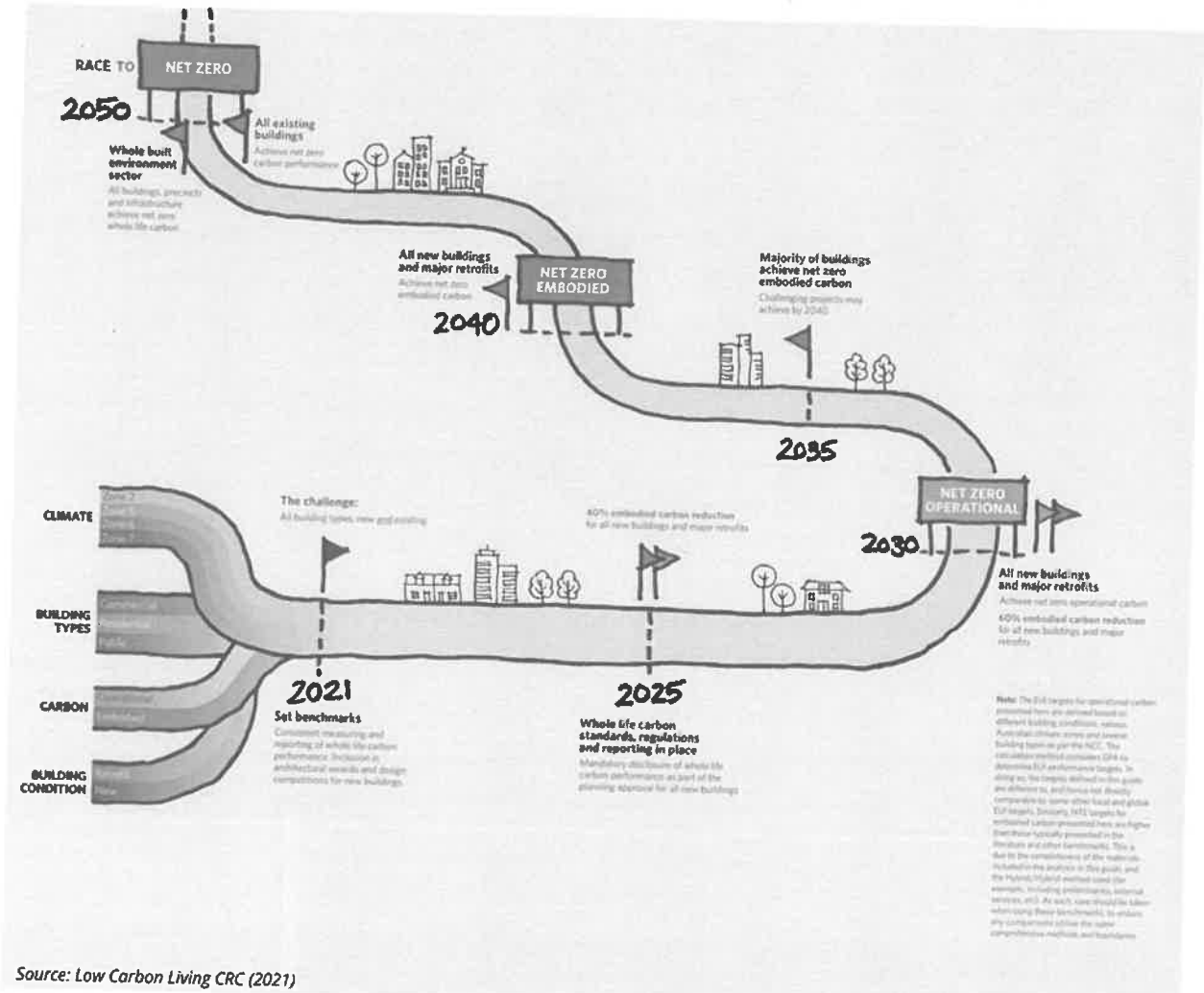
To achieve this, Resilient East discusses some specific points that should to be included within the Greater Adelaide Regional Plan, including Net Zero commitments, Greening, Hazard Avoidance, Sustainable Living, and Reducing Car Dependency.

1. Net Zero

The South Australian Government has set goals to reduce South Australia's greenhouse gas emissions by more than 50% below 2005 levels by 2030, and to achieve net zero emissions by 2050. To meet these targets, this is a critical window of opportunity to create the policies that will enable communities to achieve this outcome in less than 25 years. As this Greater Adelaide Regional Plan is about growth to 2051, much stronger alignment is therefore needed for it to support and enable the complete transition to net zero (eg. Net Zero buildings, electrify everything, space for solar and wind generation and battery storage, higher density living, new transmission lines, reduced private transport and increase in public, transport that is integrated into the energy system (BEVs etc)), infrastructure that priorities and encourages active transport.

In moving to Net Zero communities and low-carbon development, the energy efficiency provisions under the National Construction Code (NCC) are currently insufficient to adequately address transitional climate risk. The move to 7 NatHERS stars, slated to commence in South Australia on 1 October 2024, partly addresses this, but it is by no means the only solution required. The recent publication by Planning Institute Australia's (PIA) Achieving Net Zero Report highlights where planning needs to enable this action and reduce carbon in every sector, including Energy, Manufacturing, the Built Environment, Transport, and Agriculture, Forestry, and Land use.

Therefore, in consideration of the State Government's commitment to a Net Zero future by 2050, the Greater Adelaide Regional Plan needs to highlight this as a key outcome to enable this transition. Below is an example of a Net Zero pathway for the built environment as highlighted within the PIA report, adapted from Low Carbon Living CRC (2021).



Source: Low Carbon Living CRC (2021)

Figure 1 Low Carbon Living CRC 2021, 'Race to Net Zero Carbon: A Climate Emergency Guide for New and Existing Buildings in Australia'.

2. Greening

We note the Commission's commitment to achieving "a greener, wilder and climate resilient environment", but the actions outlined in the Discussion Paper are insufficient to achieve this. It is also concerning that there is insufficient recognition of the value of greening in mitigating climate change (through sequestration of carbon) and adaptation (through mitigation of urban heat and a myriad of other benefits). The most recent LiDAR survey of greater Adelaide revealed canopy cover is well below global benchmarks (exact canopy cover percentage currently embargoed). As South Australia's climate becomes steadily hotter and drier, the urban heat island is projected to catapult Adelaide into its first 50C day within the next decade. Urban canopy is critical for mitigating the urban heat islands, but despite strong and collaborative efforts from local governments who have been planting tens of thousands of trees each year, Adelaide's overall canopy is declining.

Canopy Target

Resilient East recommends that the 30% canopy target be reconsidered and replaced with more nuanced targets that consider local conditions. Local conditions could include natural vegetation assemblages, rainfall patterns, the availability of supplementary water sources and future climate change scenarios. This approach would most likely result in lower canopy targets near the coast and higher targets in the foothills. Nuanced targets should be based on benchmarked natural vegetation adjusted for regional variations, and may differ from the 30% overall canopy coverage target across greater Adelaide. Alternatively (or in addition to) they could be broken into land ownership types with different targets for private residential land, streets and open space.

Quality of Canopy

Furthermore, Resilient East advocates for emphasise of the importance of assessing the quality of the canopy as it is as important as the quantity of the canopy across greater Adelaide. Species diversity within the urban forest is a critical factor in creating a resilient and sustainable canopy into the future. Greater Adelaide is facing the challenges of climate change, which will affect the sustainability of its urban forest, which is currently primarily composed of a limited number of temperate zone species. Some species may not be well-suited to Adelaide's transition towards a semi-arid climate. There is a pressing need to rapidly expand the canopy with tree species that are resilient and suitable for the changing climate.

Fortunately, recent investment by local government in greater Adelaide in tree data management systems and on-ground tree audits have yielded a valuable resource and has been used by collaborative project across many Councils and the University of Adelaide Future Trees[1]. This research has led to the accumulation of an extensive urban forest database, encompassing approximately 600,000 trees.

Leveraging this database, provides a unique opportunity to identify rarely-planted tree species that are suitable for increased planting efforts. Furthermore, local and state governments can use this database to provide a comprehensive demographic analysis of the urban forest across the greater Adelaide region, a first of its kind. This data-driven approach will enable local and state governments to correlate tree information with climate data, infrastructure requirements, and social factors. By doing so, new insights into how the urban forest is evolving across greater Adelaide can be gained. Importantly, this approach will help local and state governments identify areas within greater Adelaide that are most vulnerable and require priority attention, target investments effectively and establish a benchmark against which we can measure the success of ongoing greening efforts.

Resilient East recommends that metrics that assess the diversity of tree species and other emerging relevant criteria should be integrated into the canopy target for greater Adelaide.

Strengthening Tree Protection

[1] https://www.resilientsouth.com/futuretrees

A primary cause of tree canopy cover decline is tree removal on private land driven by urban infill. Currently, Adelaide has the weakest tree protection laws of any Australian capital city, which protects only the largest trees – however, there are exemptions to these protections and a lack of an adequate tree valuation mechanism to facilitate investments in urban forests to replace trees that are removed. This means that the easiest default for any developer, including state government agencies, is to remove any trees on a site rather than attempting to retain them.

The Parliamentary Inquiry into the Urban Forest and Planning System Implementation Review have both been presented with strong evidence of the need for stronger tree protection laws and relaxation of encumbrances to greening on public land (e.g. through review of utility and road clearance regulations). These processes need to be systemically reviewed to create a default of tree protection (rather than the current default of tree removal) that has driven Adelaide's canopy down to such alarming levels. The interim report on the Parliamentary Inquiry is a positive step forward.

The SA Government Planning and Land Use Services commissioned report *Urban Tree Protection in Australia: a review of regulatory matters* compares Adelaide's tree protections to those in interstate capitals and provides several suggestions as to how tree protections could be strengthened, including emulating interstate mechanisms and new approaches formulated for South Australia.

Accessible Greenspace

As a general approach, the GARP could focus on adopting, in whole or part of, the 3-30-300 rule. This approach recommends governments focus on achieving:

- 3 trees visible from every home (and business);
- 30% overall canopy at a suburb/neighbourhood level; and
- A maximum of 300m distance between every home and a green space where people can meaningfully connect with nature.

This benchmark is associated with higher public health, lower crime, improved property values and a myriad of other community benefits. Ensuring that new greenfield and brownfield developments achieve compliance with this rule is an important step to improving Adelaide's climate resilience and ongoing liveability.

For practicality at a landscape level, Resilient East recommends the focus could be on the 300 meter component as it has a more solid basis and easier to measure. Ensuring a maximum distance of 300 meters between every home and a green space where people can meaningfully connect with nature is valuable goal.

Remaking and Rewilding Creekline Corridors

Greater focus on creek lines across the Adelaide plains requires a long-term and strategic approach and an excellent opportunity for GARP. Resilient East propose that creekline corridors focus on daylighting of drains and the remaking and rewilding of natural creeklines. This potential is an inspiring opportunity to provide open space that incorporates both biodiversity and active transport corridors. Sections of creeklines that have been remade and rewilded by council's have garnered community support and when designed carefully with laybacks etc can also help address flood hazard reduction.

3. Hazard Avoidance

Climate change is not some future event. We are already experiencing the effects of the changing climate, and these effects will increase over the life of the Greater Adelaide Regional Plan and beyond.

This plan is to 2051. Houses built in new growth areas, earmarked in the GARP, will be housing families in 2090. In deciding the location of new neighbourhoods (strategic infill and greenfields), we need to consider the climate conditions a century into the future – this is how long the effects of your decisions will be felt. We can choose to build in resilience for new neighbourhoods, or choose to build in vulnerability, risks and higher costs to mitigate risks. We must take this opportunity now to build climate safe housing that is sustainable, liveable, healthy and affordable in growth areas for our future.

2090 is the latest year for which we have high-confidence climate projections. In 2090, people born in 2023 will be turning 67 years old. They may have built a house in one of the proposed growth areas in their late 20s. They may have raised a family there, and commuted to work from there, and played sport there. They may still be living in that house – it would be under 40 years old – and be thinking about ageing in place there. A current deficit of the GARP Discussion Paper is that it does not determine if houses in these growth areas will still be climate safe, that is liveable, insurable, comfortable, healthy, affordable to live in, or regularly exposed to flood, bushfire and heat risks.

The best information we have about the future climate was published by Department of Environment and Water (DEW) in 2022[2]. It says that by 2090, Adelaide could experience 121% more extreme rainfall days, 79% more days of extreme heat (35C+) and 64% more severe fire danger days. These are significant changes and will challenge the norms of safe housing for communities. With the GARP's key role being to determine where Adelaide should grow, it is critical to use the available data on where these effects will most be felt – for example, by using spatial models of riverine inundation, urban heat and greening, and bushfire risk – to minimise the vulnerability of current and future generations, and the liabilities of current and future governments.

4. Sustainable Living (Building better housing)

The cost of housing and associated cost-of-living pressures will continue to be an issue in the near to medium term future. With so much attention given to *housing affordability* (i.e. reducing the purchase price of new homes through increasing housing supply) other macro pressures are excluded. While reducing the upfront purchase price of housing is important, ignoring the ongoing *operational* cost (i.e. how much does the house cost to *live* in) is a short-sighted exercise that negates the pressure that many homeowners experience regarding utility costs to maintain comfortable (and safe) temperatures inside their homes. Many homes are now so reliant on air-conditioning to maintain comfort, that the resident is placed in the binary choice of having either a large and expensive electricity bill or going without and being uncomfortable and unsafe – a situation that can impact on the physical and mental health of the occupant.[3] As greater Adelaide shifts from being a Mediterranean to a semi-arid climate[2], providing climate safe housing that addresses heat exposure and health will be of increasing importance.

The low hanging fruit in this equation is energy efficiency. While energy efficiency is part of building rules consent, for energy efficiency to have maximum return on investment, it needs to be supported at all stages within the planning system. This can include a consideration of lot composition and orientation, materials and design, shading and green space and retaining trees on site as a matter of course and not an exception.

With the National Construction Code energy efficiency change from 6 to 7 stars in SA now pushed back to October 2024, it could be considered a 12-month lost opportunity to introduce higher standards for homes built in South Australia. While acknowledging this factor, it is also vitally important to acknowledge that the South Australia building industry is currently under intense pressure. We have seen several high-profile building companies collapse in recent months with what the Housing Industry Association is calling a "profitless boom". For South Australia to change this around, meeting population growth and housing supply targets, while addressing housing affordability *and* while continuing to be able to adequately service the current and projected growth, something will have to change. While not currently on the agenda, a precautionary principle should be applied to any suggestion that removing sustainability criteria or energy efficiency standards will result in an adequate market mechanism to alleviate industry pressure. All this is likely to do is further project forward key issues, entrenching the cost-of-living pressures and climate vulnerability through increasing hazard exposure.

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[2] Department for Environment and Water (2022) Guide to Climate Projections for Risk Assessment and Planning in South Australia 2022, available at: https://www.environment.sa.gov.au/topics/climate-change

[3] Gertrud Hatvani-Kovacs et al (2018), Heat stress-resistant building design in the Australian context, *Energy and Buildings*, Vol 158, pp 290-299, https://www.sciencedirect.com/science/article/pii/S0378778817307648

Climate hazard exposure is not adequately addressed in the Planning and Design Code. Ideally, in order for the Code to address systemic, cascading and compounding climate risk, the Code should account for (as example) heat hazard exposure, flood risk, sea level rise, storm surges, higher peak rainfall events, increased bushfire risk and extreme storm risk (primarily wind action on structures). A current opportunity exists within the Planning and Design Code to front load climate risk assessments that consider the impact on the useful life of the buildings under different climate change scenarios and demonstrate performance-based outcomes that align with existing climate projections and best-practice outcomes and provide climate safe housing. This consideration also needs to acknowledge that the built environment has a key role in supporting and meeting South Australia's NetZero and emission reductions targets. Essentially, this consideration acknowledges that homes that we build today are going to be operating under a different climate in the future and need to be adequately designed, constructed and assessed to account for this.

5. Reducing Car Dependency

Promoting Active Transport and Reducing Car Dependency

Greater Adelaide faces a unique challenge due to its large footprint and low population density. These factors make it challenging to service through public and active transport routes, leading to a heavy reliance on cars for transportation, . Car dependency is deeply ingrained in the urban form of greater Adelaide. The function of moving cars around, quickly, safely and directly, along with the associated storage required at end of trip, continues to directly influence all land use planning and transport outcomes. In addition, due to a cost premium for space, many newer developments have reduced off-street parking due to smaller garage spaces, which is impacting public space creating unwanted street congestion as residents park outside their homes and issues for kerbside bin storage and placement.

To effectively work towards reducing car dependency, it is crucial to direct land use planning towards creating employment zones near residential areas and improving public transport and active transport routes . However, it is unlikely that Adelaide will become less car-dependant in the next three decades without substantial infrastructure investment and cultural change programs.

Innovative Infill Development

We need greater innovation for infill development. Infill is a necessary mechanism for curtailing the expansion of Adelaide at its fringe and uplifting population density around existing urban activity centres. It can be a way to deliver high-quality housing options and increasing density to house the expected population growth of Adelaide. When done well, infill can provide more choice in the market and a diversity of housing typologies and entry level price-points to accommodate low-income, essential workers, first home buyers and families who want to embrace 'Living Locally' within existing urban environments. However, the elephant in the room as we transition to medium - higher density dwelling options is the spaces and places that we give over to car use.

A key question that can be asked to understand the opportunity afforded by greater infill - is what will innovative land use patterns, that do not require high-levels of individual car ownership actually look like? While these developments would support higher density housing, and be co-located with activity centres, employment lands, and close to public and active transport corridors, it should be that reducing private automobile use is the main driver in the design and development. These developments should be characterised by high levels of green infrastructure, be well-connected, and take advantage of existing underutilised land that is co-located with public and active transport spines.

Road Safety: Improved Infrastructure and Lower Speed Limits

One essential aspect of promoting active transport and reducing car dependency is the development of a vastly improved network of separated cycle lanes and paths. Additionally, lowering the urban default speed limit from 50km/hr to at least 40km/hr, with targeted areas where riders and pedestrian routes are reduced to 30km/hr, is a critical step in promoting safe and efficient active transport options. These measures are essential to achieve the goals of reducing car dependency which also directly reducing transport emissions and alleviating congestion.

Active transport, has demonstrated outstanding health, cost-of-living, and environmental benefits, and with advances in e-bikes, cargo bikes, and other personal mobility devices, the barriers related to distance and carrying capacity have significantly diminished. However, perceived and real safety concerns, particularly for women and families, remain significant barriers.

Women, in particular, tend to be risk-averse and will not travel on the road if they feel unsafe, limiting active transport and micro-mobility options for many. Separated cycle lanes and paths offer a safer and more attractive option for commuters to choose cycling or micro-mobility over cars. This approach is supported by the United Nations Development Programme (UNDP) report, "Safe Cities and Safe Public Spaces for Women and Girls 2010".

Data clearly indicates that pedestrians are at greater risk of death and injury when struck at impact speeds above 30km/h. The most vulnerable pedestrians are children and older people. Similarly, the severity of injuries to cyclists in collisions with cars is closely related to impact speed. The implementation of lower speed limits, specifically 30km/h, in urban areas has consistently proven to reduce the severity of injuries for cyclists, micro-mobility users and pedestrians. A study by Wegman, D. & Aarts, L. in 2006 in the journal "Accident Analysis and Prevention" supports the idea that reducing speed limits significantly reduces fatalities and serious injuries caused by motor vehicles.

Resilient East believes that reducing car dependency is subject to the commitment of a lower default urban speed limit and improved infrastructure to increase safety and ensure active transport options are not gender-restricted.

6. Preparing for Electric Vehicles

Australia's uptake of electric vehicle (EVs) is expected to rise rapidly over the next decade. According to the EV Council, State of EV's Report - July 2022, in 2022 EV sales (as a proportion of new vehicle sales) was 6.5% in South Australia, and in 2023 is already more than double all of 2022. In 2030 the sale of new gasoline and diesel vehicles (internal combustion engine or ICE vehicles) will be banned in Europe and parts of America and 2035 in the UK.

It is anticipated that 80% to 90% of EV owners will charge their EV at home or at work[4]. In 2022, reform to the National Construction Code (NCC) saw the introduction of EV-Readiness requirements. South Australia's requirements will take effect from October 2024, as follows:

- 100% of car parking spaces in apartment buildings constructed will be EV-Ready
- 10% of office car parking spaces will be EV-Ready
- 20% of other commercial buildings will be EV-Ready.

There is currently a gap in the Planning and Design Code as it relates to EV policy and it is critical that policies are included within the Planning and Design Code that support the EV transition to future proof our cities and communities to enable the transition to EVs. It is also critical that planning takes into account the need for EV infrastructure and integration with current energy systems.

.

Contact and follow-up

Thank you for your consideration of the feedback provided in this submission. By factoring in climate knowledge, we have an opportunity to build new neighbourhoods that are affordable, liveable, comfortable and healthy.

Should you have any questions please contact me at [redacted]

Yours faithfully

[4] https://electricvehiclecouncil.com.au/wp-content/uploads/2022/08/Home-EV-charging-2030.pdf

[redacted]

Maria Zotti
Manager Environment & Sustainability Services
Campbelltown City Council

Chair
Resilient East Steering Committee

On behalf of Resilient East www.resilienteast.com

CITY OF ADELAIDE | City of Burnside | CAMPBELLTOWN CITY COUNCIL | City of Norwood Payneham & St Peters | CITY OF PROSPECT | CITY OF TEA TREE GULLY | THE CITY of Unley | TOWN OF WALKERVILLE

From:	Jen St Jack
To:	DTI:PlanSA Submissions
Subject:	Resilient Hills & Coasts submission on GARP
Date:	Friday, 10 November 2023 3:30:56 PM
Attachments:	Outlook-0bb0ha4t.png Greater Adelaide Regional Plan_RH&C Submission.pdf

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> You don't often get email from jen@stjack.com.au. Learn why this is important

Hello Growth Management Team,

I apologise for the delay on the attached submission, I've had sick kids and didn't realise it didn't send.

I hope it can still be considered.

Many thanks,

Jen St Jack
Principal | St Jack & Co
0438 899 514 | jen@stjack.com.au

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: FW: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers
Date: Monday, 6 November 2023 11:08:01 AM
Attachments: image001.png
SAIR Submission RevB - Final.pdf
image002.png

OFFICIAL: Sensitive

Hi Team

Can you please ensure the attached submission on the GARP Discussion Paper is captured and considered.

Cheers
Britt

Britt Anderson | Ministerial Liaison Officer - Planning
Office of the Hon Nick Champion MP
Minister for Trade and Investment
Minister for Housing and Urban Development
Minister for Planning

P: [redacted]
GPO Box 11032| ADELAIDE SA 5001 | DX 168
Level 10, 1 King William Street | ADELAIDE SA 5000

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From: [redacted]
Sent: Monday, November 6, 2023 11:03 AM
To: [redacted]
Subject: Fwd: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers

OFFICIAL: Sensitive

Can we make sure this gets to where it needs to go please ?

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From: Amanda Price-McGregor <greenlightplanning@outlook.com>

Sent: Monday, November 6, 2023 10:50 am
To: DTI:Office of Minister Champion <MinisterChampion@sa.gov.au>
Cc: [redacted]
Subject: FW: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers

Dear Minister Champion,

Please find **attached** a copy of the SA Independent Retailers & Metcash Food submission on the Greater Adelaide Regional Plan (GARP).

I hope this is of use to you.

Warmest regards
Amanda

Amanda Price-McGregor
Managing Director, Green Light Planning, MPIA
m: [redacted] e: greenlightplanning@outlook.com
a: PO Box 158, Kensington Park, SA, 5068
w: www.greenlightplanning.com.au

From: Amanda Price-McGregor
Sent: Monday, November 6, 2023 10:46 AM
To: 'plansasubmissions@sa.gov.au' <plansasubmissions@sa.gov.au>
Cc: [redacted]>
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers
Importance: High

Dear Growth Management Team,

Please find **attached** in relation to the Greater Adelaide Regional Plan (GARP) from South Australian Independent Retailers (SAIR) and Metcash, Food.

I trust this feedback is useful to you review and consideration of the submissions received on the GARP Discussion Paper and we would appreciate the opportunity to discuss this in person, once you have had a chance to review.

May I invite you to contact my client [redacted]

Thank you in advance
Amanda

Best regards,
Amanda

Amanda Price-McGregor

Managing Director, Green Light Planning, MPIA
m: [redacted] e: greenlightplanning@outlook.com
a: PO Box 158, Kensington Park, SA, 5068
w: www.greenlightplanning.com.au

South Australian Independent Retailers
Supporting local

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

Via email: plansasubmissions@sa.gov.au, (subject: Submission – Greater Adelaide Regional Plan Discussion Paper)

Dear Craig,

I refer to the Greater Adelaide Regional Plan Discussion Paper (GARP) which is currently out for public consultation and wish to provide the following response on behalf of State's Independent retail sector, South Australian Independent Retailers (SAIR) and Metcash, Food.

1.0 SAIR Background

SAIR advocates on behalf of the 120 owners representing over 200 independent supermarkets stores which are branded Foodland, IGA & IGA Local Grocer. This sector employs some 12,000 people which also includes over 300 staff in the Metcash wholesale distribution centre at Gepps Cross

The Retail/Wholesale Industry is the biggest 'private' employer in South Australia (circa 102,000) and independent supermarkets are the largest sector i.e. circa 12%

As a collective group, this sector is the largest private employer in the State and maintains a greater than 20% market share of the Supermarket sector which is the highest market share for Independent stores in Australia.

The South Australian supermarket industry is a robust marketplace in which the independents vigorously compete against the major national and international chains.

The independents are driven by having a strong emphasis on:

- quality customer service and support
- targeting and promoting local South Australian brands of manufactured food and grocery products
- promoting the largest range of Australian branded food and grocery products
- leading the promotion of South Australian and Australian fresh meat, fresh fruit and vegetables

These factors and the increased competition provided by strong vibrant independent supermarkets is a driving force in ensuring SA shoppers pay less for their groceries versus like for like baskets on the Eastern seaboard.

Independents in South Australia provide excellent career pathways and take the training and development of their staff very seriously, in order to provide local quality customer service and employ more people per store than their competitors.

'advocating for all independent owners of Foodland; IGA and Friendly Grocer supermarkets in South Australia'
PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

1.1 SA Retail Market – State of Play

While we are confining our submission in the main to the South Australian independent supermarket sector, the more recent and current state of play is worth outlining as it cuts to the heart of the planning policy positions that we are advocating.

Although the food and grocery sector is experiencing a more 'stable' economy, there are still other factors to consider and as cost of living pressures continue to impact household spending the sector is going to continue to face headwinds post the COVID pandemic

Consumers are holding back on their discretionary spending due to rising cost of living expenses in particular rent, /mortgages and consumables such as energy, healthcare, education, transportation, rates and taxes and insurances etc.

We have like many other industries weathered the COVID pandemic along with natural disasters in terms of storm damage and the current flood risk continues to impact communities we serve.

We are also seeing more regularly in South Australia, 'small shopping centres' across the State with tenancy vacancies up to 50%. In some instances, there are 100% vacancies i.e. completely vacant shopping centres, scattered around both metropolitan Adelaide and regional South Australia.

This is a trend that has been increasing over the last few years in the United States of America. The lag time between their retail market experiences and ours is traditionally around 3-5 years and as such we must act now to sure up our centre's hierarchy to ensure the same does not happen here in South Australia.

Most of our owners are traditionally the anchor tenant in shopping centres. Moreover, the other businesses within these shopping centres are mainly South Australian owned and categorised as SME's e.g. local pharmacies, butchers, florists, newsagents, locally run Post Offices, takeaway shops, bakeries, medical and dental practices etc.

Our family-owned independents' pride themselves in serving their local communities, partnering with their local supply chains, working with all locally owned retail business operators, supporting local service & sporting organisations.

However, our independents are increasingly concerned about urban/retail developments that only consider 'progress for progresses sake' and the 'we need large land holdings and do not want to pay retail floor space rates' and not the unintended consequences resulting from poor planning.

It is our firm and considered view that there is a real need to further strengthen and protect the centre's hierarchy, to avoid additional and unnecessary pressure on the market place, and the hierarchy should be retained in spite of the projected future population growth.

1.2 Alignment with State Planning Policy 9: Employment Lands (SPP 9)

The independent retail supermarket sector are strong advocates for centre-based planning and are in lockstep with the South Australian Government's commitment to activity centre planning through their adoption of the Key Principles of Retail Planning which is reinforced in the State Planning Policy 9: Employment Lands (SPP 9), specifically:

- *Existing centres – recognise existing activity centres, main streets and mixed-use areas as the primary place for commercial and retail activity.*
- *Expansion – allow for expansion of designated centres at 'edge-of-centre' locations.*
- *New activity centres – allow new activity centres to be established to support equitable and convenient access to services, while supporting productive settlement patterns.*

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- *Hierarchy – protect higher-order centres that support a productive settlement pattern, while allowing for smaller-scale activity centres to emerge and diversify.*
- *Urban design – reinforce the role of land use policies to guide urban form and place-making in mixed-use activity centres.*

The clustering of activities in centres, including retail uses with other allied services such as health, education, administration, entertainment and recreation, supports many of the economic, environmental and social outcomes sought by the planning system, such as choice for consumers, transport/infrastructure efficiency and productivity, environmental and heritage protection, resource preservation, employment clustering, and better management of land-use interfaces and potential conflicts.

This clustering of activities in centres minimises the negative impacts and costs which are often environmental and social in nature and can be widespread, including;

- increased vehicular use and reduced public transport use and accessibility
- reduced community access to a focussed hub of services, facilities and amenities
- foregone opportunities for urban intensification focussed around the amenity of activity centres anchored by retail uses
- loss of business synergies associated with clustering

1.3 30 Year Plan for Greater Adelaide

We believe that highlighting our concerns with the current 30Yr Plan for Greater Adelaide (The 30Yr Plan), will help articulate our position and thus the recommendations for this Discussion Paper which we have outlined below.

The current iteration of the 30Yr Plan fails to recognise the importance of centre-based planning and retail catchment analysis and there is real opportunity now, post the gathering of feedback on the Greater Adelaide Regional Plan Discussion Paper to correct those policy anomalies, while providing greater direction and certainty to the marketplace so it can make informed decisions about future planning and investments.

The current 30 Yr Plan advocates for the following policies relating to retail that we wish to focus on;

- *P8. Provide retail and other services outside designated activity centres where they will contribute to the principles of accessibility, a transit focused and connected city, high quality urban design, and economic growth and competitiveness.*
- *P56. Ensure there are suitable land supplies for the retail, commercial and industrial sectors.*

Firstly, there needs to be greater clarity around the use of the word 'retail' and in particular where supermarkets are and are not envisaged and we have previously recommended a definition of the word 'supermarket' as just one way of addressing this matter.

For example……

Supermarket *Supermarket means premises the principal purpose of which is the sale of groceries and foodstuffs to provide for the needs of people who live or work in the local area.*

Secondly, in regard to P8 above, and retail shops outside of designated activity centres, we are of the firm view that this policy is at odds with State Planning Policy 9: Employment Lands (SPP 9), which seeks to recognise existing activity centres, main streets and mixed-use areas as the primary place for commercial and retail activity and allow for expansion of designated centres at 'edge-of-centre' locations.

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When it comes to new activity centres, and where they are best placed, one of the biggest challenges is the lack of centres-planning and retail catchment analysis to determine areas of greatest need, namely where certain centres might be over-trading because demand is out-stripping the current supply of gross of leasable floor area.

For example while the township of Meadows is currently experiencing growth and take up within the new residential land releases is sound, residents need to travel 18-20 kilometres to the nearest supermarket at either Mt Barker, Aberfoyle Park, Strathalbyn or McLaren Vale to do their supermarket shopping.

Coupled with this, the current Local Centre Zone which runs in an east westerly direction through the township is fully occupied with existing built form, with the exception of the local recreational oval. With a township the size of Meadows and the degree of over trading occurring in neighbouring townships, additional appropriately zoned land is required in this township to facilitate a medium sized supermarket in conjunction with other retail tenancies.

In reference to P8 above, previously, there was a view that allowing 'Out of Activity Centres' retailing, in particular supermarkets, was a means to stimulate economic development and jobs growth, but in the absence of greater population growth and increase demand for retailing, this is not the case.

In the past, the location of supermarkets and shopping centres 'out of activity centres' and outside of townships, main streets and core business areas have had dreadful community consequences, dividing towns, sending existing main street businesses broke and resulting in vacant shops littering main streets and townships.

To give a regional context, communities in towns like Renmark, Mt Gambier, Port Augusta, Whyalla and Victor Harbor have seen first-hand the negative impacts of poor planning which allowed ad-hoc 'out of centre development' and while some of these towns are starting to recover now, it has taken many years.

Allowing supermarkets to establish in 'out of centre' zones enables the larger supermarket operators, such as the multinationals, to acquire large tranches of land and develop that land where the entry costs are lower than commercially zoned land, thus giving the 'out of centre' developer a competitive and commercial advantage over their independent competitors.

This represents an uneven playing field, and it is something we are committed to working with the State Government on.

While we support small-scale retailing in the form of local cafes, personal services establishments, offices and consulting rooms to activate and provide convenience services to local communities, we do not support full line supermarkets outside of activity centre zones.

As a result, we believe the Greater Adelaide Regional Plan needs to take a stronger position on 'out of activity centre' retailing, making it clear that it is not encouraged, unless there is a robust retail catchment analysis that identifies over trading at centres outside the catchment, and there is insufficient supply to cater for current demand.

Recommendation 01 The Greater Adelaide Regional Plan needs to take a stronger position on 'out of activity centre' retailing, making it clear this is not encouraged unless there is a robust retail catchment analysis that identifies over trading at centres outside the catchment, and there is insufficient retail floor area to cater for current demand. Moreover, the development of non-residential development outside of centre zones will not diminish the role of the activity centre.

This point immediately above is closely aligned with the current 30Yr Plan's P56 in relation to ensuring there is suitable land supplied for the retail, commercial and industrial sectors.

When it comes to the supply of future retail land, some Councils have been better than others in undertaking their own strategic retail planning and catchment analysis over the years as part of their overarching centres-policy planning.

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PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

However, it is important now, with the current and future growth areas and corridors identified for renewal and regeneration, that this retail catchment planning is done in a holistic way, across the entire Greater Adelaide Region.

At present, in some areas, the spatial allocation of new centres appears to be occurring through the creation of 'Emerging Activity Centre Sub Zones' over large traches of land and the identification of potential sites for Activity Centres via a Concept Plan within the Code for example Angle Vale, see **below** the Suburban Activity Centres are shown via the blue circle on the Concept Plan 17.

Concept Plan 17 Angle Vale

Presumably, these Concept Plans could be updated at any time, therefore changing the location of the future emerging activity centre.

This approach is impacting upon investor certainty and investment decision making.

The current widespread use of Emerging Activity Centre Sub Zones is confusing to landowners trying to sell their land and the use of the Concept Plans (which could be changed at any time) to identify new Suburban Activity Centre sends mixed messages to commercial retail investors, risks sites siting vacant for longer than they should and discourages investment.

Investors are concerned that other sites not currently identified in the Concept Plan as a Suburban Activity Centre could be the subject of a Code Amendment or a change to the concept plan to facilitate a new centre on a site currently not anticipated for an activity centre use.

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To encourage investment, there needs to be more certainty for the market. There needs to more rigor around the location of new and emerging activity centres and they need to be developed through careful centres-planning and based on a detailed retail catchment analysis as opposed to any adhoc location of sites via a Concept Plan update approach.

There is now a need for an activity centre's catchment analysis to be undertaken for the entire Greater Adelaide Region to ensure that future activity centres are located in the right spatial locations, such as current growth areas, areas identified for future growth and areas where the demand for retail floor space is exceeding supply, leading to over trading by centres outside the catchment.

While the location of activity centres and supermarkets specifically within those centres are often part of a master planning process in growth areas and master planned communities, the location of the supermarkets within the activity centre zone could benefit from oversight and recommendations from commercial advisors, providing a retail perspective to how centres best operate and provide the most value to a community.

Ensuring a suitable land supply of retail land is important, but it is critical that new centres are located in the right locations to deliver the greatest benefits to community, whilst not diminishing the role of existing centres.

This also provides the market with clear direction and a firm planning policy base from which to make their future investment decisions.

Recommendation 02. There needs to be a retail catchment analysis undertaken for the Greater Adelaide Regional Area to determine areas that require new activity centres, the size and make up of those activity centres and the siting and location of those new centres.

Recommendation 03 New centres should be clearly identified via an appropriate Activity Centre zoning and should give clarity around whether a supermarket is being sought or not as part of that new centre or not.

2.0 Retail Servicing for Growth Areas

Aligned to the point above, there is a need for future growth areas to also plan for and allocate suitable land aside for retail land uses that are spatially located where they can provide the greatest benefit to those new and emerging communities. Areas such as those identified as regeneration and growth areas need a centres-based planning approach to the location of new activity centres for example Concordia, Sellicks etc

3.0 Where should we grow – Does Defence land present opportunities?

We propose that the scope of where the Greater Adelaide Region could grow in the future, should be expanded upon to also take into consideration land owned and / or occupied by the Federal Government generally, but in particular defence lands. For example, we would see advantages in engaging with the Department of Defence to see if sites such as their Keswick and Warradale Army Barracks and Defence land at Smithfield, adjacent the Munno Para regional shopping centre are still required for their operations, or so they present opportunities for future residential growth.

Recommendation 04 Consideration should be given to engaging with the Federal Government and in particular the Department of Defence in relation to Federal Government land holdings within the Greater Adelaide Region to ascertain if any sites are surplus to their requirements.

4.0 Strategic Infill and Corridor Growth

Figure 10 in the Discussion paper identifies proposed areas of investigation: Strategic infill and corridor growth, see below.

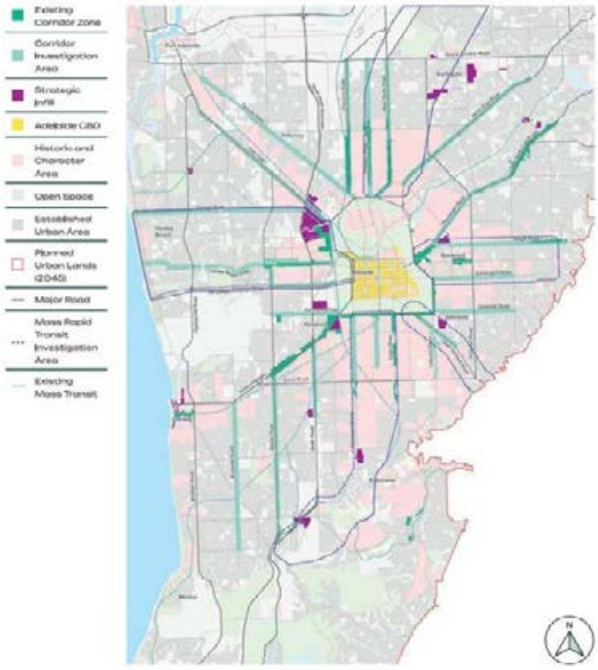
For total transparency, we have a number of Foodland and IGA supermarkets within the areas identified on the plan as being located in the Mass Rapid Transit Investigation Areas. Continuation of trade and access to our supermarkets and

'advocating for all independent owners of Foodland; IGA and Friendly Grocer supermarkets in South Australia'
PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

the shopping centres they reside within is critical to the success of our independent owners' businesses and our broader business model.

We would appreciate the opportunity to have early engagement and ongoing discussions with you and the Department of Transport in relation to the planning and status of the proposed mass transit investigation areas as outlined in Figure 10 below.

Figure 10 – Proposed areas of investigation:
Strategic infill and corridor growth



Thank you for the opportunity to comment on this Discussion Paper and we would welcome the opportunity to meet with staff in relation to this submission and to work with them on the next iteration of this discussion paper. Please make contact with Sam Zucco [redacted] or Matt Roberts [redacted] at your convenience.

We look forward to seeing the changes we are recommending being considered and hopefully adopted into the Greater Adelaide Regional Plan to ensure it achieves its intensions while ensuring a level playing field for the retail sector.

Yours sincerely

[redacted]

Sam Zucco

Chairman
SA Independent Retailers

[redacted]

Matt Roberts

General Manager SA/NT, Food
Metcash

(On behalf on the 120 South Australian family owners and the 12000 South Australian employees).

6 November 2022

Cc *Hon Nick Champion, MP*
Minister for Planning

'advocating for all independent owners of Foodland; IGA and Friendly Grocer supermarkets in South Australia'
PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

From:	PlanSA Submissions
To:	DTI:PlanSA Submissions
Subject:	Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Date:	Monday, 6 November 2023 3:54:04 PM
Attachments:	SAYP-GARP-Discussion-Paper-Submission.docx.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Advocacy Organisation
Given name:	Julien
Family name:	Beauvillier
Organisation:	SAYP Committee (PIA)
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Please find attached the GARP Discussion Paper submission prepared by the members of the SAYP Committee.
Attachment 1:	SAYP-GARP-Discussion-Paper-Submission.docx.pdf, type application/pdf, 126.7 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

Date: 06 / 11 / 2023

Chair of the State Planning Commission
Planning and Land Use Services
E. saplanningcommission@sa.gov.au

Re: Response from SA Young Planners to the Greater Adelaide Regional Plan (GARP) - Discussion Paper

Dear State Planning Commission,

Thank you for the opportunity to provide feedback to the documents currently on consultation.

This document is written as a submission in response to community consultation on the Greater Adelaide Regional Plan (GARP) - Discussion Paper. It has been prepared by members of the South Australian Young Planners committee (SAYP), a sub-divisional committee of the Planning Institute of Australia (PIA), and the views expressed here are those of the SAYP policy working group, prepared on behalf of the SAYP committee following the group's participation in a Greater Adelaide Regional Plan workshop facilitated by PLUS and subsequent internal discussions and workshops.

The SAYP have chosen to actively engage with community consultation on the Greater Adelaide Regional Plan (GARP), including in preparation of a policy submission, as both an opportunity to engage in constructive debate around how our State plans for the future, as well as to ensure the views of young professionals within the critical profession of planning are heard, including their strong wishes to see a more accessible, inclusive, and efficient planning system - as well as a more resilient, sustainability, and livable future for South Australia.

Who are Young Planners?

A Young Planner is a student or graduate of a planning or planning related degree with up to 5 years post graduate experience. PIA strongly supports the role young planners will play in the future of the profession, The Planning Institute, and the State of South Australia. PIA has had a network of Young Planners that promote, support and represent Young Planners since March 1996. This network operates in each state and territory across Australia. At a state/territory level young planner groups:

- Arrange social and information sessions and activities.
- Support young planners at Divisional levels.
- Promote the role of young planners within the planning profession.
- Foster links between PIA and Universities.

- Promote student and graduate membership of PIA.
- Promote interaction between young planners, especially between student and graduate planners.
- Contribute to community consultation and provide policy responses to proposed policies, reforms or action plans at the local, state and national levels.
- Promote the planning profession as a whole.

The SAYP have organised their submission into a number of key discussion points, all of which draw upon existing themes within the GARP for which consideration and refinement is encouraged.

Growth Areas

The SAYP Committee expresses support for proposed emphasis of new greenfield growth occurring primarily in the North, respecting the value of agricultural and environmental land in Mclaren Vale, Adelaide Hills and Fleurieu Peninsula, and recognising the likely lower costs of infrastructure delivery in this region.

However, the concentration of such growth in a particular region will likely bring its own distinct challenges, particularly in the deployment of service infrastructure such as pipes and roads, and of new communities developing ahead of critical community infrastructure such as schools and medical facilities. Areas that can capitalize on previous, planned, or lower cost-to-deliver investment in major physical and social infrastructure should be prioritized ahead of others, and the north may need to be divided into further sub-regions in which the sequencing of development land can be planned to enable government and private sector interests to better coordinate.

Strategic Infill v General Infill

The SAYP Committee supports a sensible approach to enabling infill development as a means of enabling more housing in proximity to existing services - particularly transport - enabling urban regeneration, and enabling greater housing diversity in existing suburbs.

However, the SAYP Committee supports a prioritisation of strategic infill development (including Urban Corridor and Urban Renewal Zones in the right locations) over general infill development, and targeting zoning settings in existing suburbs which promote a gradual renewal of housing stock rather than the often highly sporadic clusters of land divisions and building activity which councils find challenging to plan for from an infrastructure perspective. In addition, the type of infill occurring in suburbs is often undertaken in an ad hoc fashion, with small blocks of land being developed individually. In this process, little thought or consideration is given to the vicinity or neighbourhood as a whole resulting in repetitive designs of residential units with often high site coverage, low soft landscaping, and streets clogged up with cars. A better designed urban environment could arise from

approaching infill with a broader perspective and using tools such as land amalgamation to create allotments with higher quality of private, semi-private and public open space, better street interaction and climate sensitive design.

A greater emphasis on the provision of housing diversity in the CBD and inner suburbs has also been raised as a priority. Over the last 10 years, our CBD has shown incredible growth with the addition of apartment towers, student accommodations and a wider choice of small businesses, all contributing to the vibrancy of the city as well as its attractivity. It is however noted that the Adelaide city centre still needs a greater variety of housing stock in order to ensure greater choice and affordability for all South Australians and visitors.

High-Growth Scenario

The SAYP Committee supports the consideration of high growth scenarios in order to better prepare for a variety of potential futures. However, concerns were raised regarding the release of residential land both in terms of timing and location. The release or rezoning of additional residential land should relatively closely match the near-term demand of the housing market, and should occur as close to, and in a logical sequence, to maximise the use and accessibility of existing infrastructure, particularly transport, to ensure our new suburbs are as connected as they can be.

The release or rezoning of substantially more land than is required does have the potential to create unintended side-effects, such as the commencement of multiple slow moving development fronts held up by competing infrastructure demands, and the sub-optimal use of existing infrastructure. Prioritising the release of residential land close to existing infrastructure and urban transport routes is the best way to reduce our overall car dependency, limit the extent of urban sprawl and develop a more sustainable South Australia.

The SAYP Committee considered the absence of including existing Train, Tram, and O-Bahn routes as *"key transport corridors*" in *Figure 6: High-level constraints map* to be inadequate.

The SAYP Committee discussed the wording used in the writing of principles 5 and 6 of Part 2: Where should Adelaide grow? The wording used raised questions as to where suitable land would be identified for rezoning, and would an under-supply of housing imply that encroachment into the EFPAs could be easily justified. The SAYP Committee considered that land within the EFPAs would still need to be demonstrated as being *superior* in its justification for development than alternate options.

Regional Open Space

The SAYP Committee expresses support for the focus on regional scale open space networks, including strong support for a review of the previously planned Metropolitan Open Space System (MOSS) and the principles of a State coordinated strategy for the dual objectives of achieving regional scale open space and biodiversity corridors.

A review of the previously planned Metropolitan Open Space System could identify and distinguish between those areas for which the intended open space status of the land has been achieved; either though zoning (Open Space, Hills Face) or ownership (Council, State); areas in which the zoning and/or ownership strategy requires further coordination; and areas which surround existing parts of the open space network and could be considered for future inclusion.

The northern suburbs require a particular focus with regards to a State coordinated strategy for achieving regional scale open space - as the geographical features which have historically given rise to substantive regional scale open and environmental land such as valleys, hills, and rivers are not as present in the flatter north. The creation of an inter-urban break and open space/biodiversity corridor between the Hills and Gawler River in particular requires a coordinated strategy which builds upon existing accumulation of environmental land by PLUS.

Lack of Integrated Transport Planning

The SAYP Committee believes that the GARP Discussion paper was noticeably lacking with regards to long term planning for mass transport, particularly given the extent of land to be opened up to development in the North.

According to the PDI Act: *"A regional plan should include a long term vision for the relevant region or area, including provisions about the integration of land use, transport infrastructure and the public realm"*

For instance, *Figure 2 – Proposed areas of investigation: Greenfield and satellite city growth* should clearly identify existing rail corridors through to Mt Barker, Virginia/Two Wells, Roseworthy, Concordia as "*potential mass transit"*, not necessary as a statement of intent, but as clear recognition of potential mass transit options to be preserved for future consideration.

The SAYP Committee felt that the previous 30 Year Plan for Greater Adelaide, coupled with the Integrated Transport and Land Use Plan (ITLUP) was heading in the right direction by identifying strategic urban corridors, contemplating the upgrade and development of transport solutions as well as the appropriate land uses which could surround them. *Figure 3 – Proposed areas of investigation: Strategic infill and corridor growth* goes some way to maintaining an integrated view of transport and planning at the inner urban scale in identifying *Mass Rapid Transit Investigation Areas,* however the SAYP Committee were concerned that if long-term mass transit and network planning were insufficiently addressed within the GARP, Adelaide was likely to develop in ways that only furthered the challenge of enabling improved public transport in the future

The absence of any reference to a City Underground Rail Link - a previously contemplated mass transit project within the ITLUP which would see north and south rail services connected through the CBD via an underground section - was noted, and its removal was not supported. Adelaide is the

largest Australian city with only a single CBD railway station and without through services, and the limitations of our existing rail access to the whole of the CBD are a major contributor to Adelaide's poor rail patronage relative to other cities. Such a project would provide holistic rail access to the entirety of the CBD, and would enhance the value and patronage of all existing Adelaide Metro rail services. The freeing up of capacity within the existing Adelaide Railway Station would create an opportunity for less-frequent services - such as a service from Mt Barker - to utilise the old station on an express basis - with the ability to easily transfer to other services if required.

The SAYP committee appreciates the acknowledgment that electric vehicles (EV) and autonomous vehicles (AV) are an important technological step-change, rather than a solution to congestion and vehicle-emissions, nor a justification for further prioritising road users to the detriment of active and public transport.

SAYP look forward to future collaborations and community consultations with the State Planning Commission.

Yours sincerely
SA Young Planners

DTI:PlanSA Submissions

From: Belinda Marsh [redacted]
Sent: Monday, 6 November 2023 4:59 PM
To: DTI:PlanSA Submissions
Cc: Brooke Acquaviva
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: SANFL Submission_GARP_Nov2023.pdf

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

Hello

Please find attached SANFL correspondence related to the GARP Discussion Paper consultation process.
If you have any questions in relation to this matter, please contact me on the details below.

Regards
Belinda

Belinda Marsh
Head of Infrastructure & Government Relations
Adelaide Oval | North Adelaide SA 5006
[redacted] | sanfl.com.au

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SANFL
ABN 59 518 757 737

Office
Level 2, Riverbank Stand,
Adelaide Oval, War Memorial Drive,
North Adelaide SA 5006

Postal Address
PO Box 606 Tynte Street,
North Adelaide SA 5006
T 08 8424 2200
W sanfl.com.au

MAJOR PARTNERS

6 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
Via email: plansasubmissions@sa.gov.au

To whom it may concern,

RE: Submission – Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to provide a submission on the Greater Adelaide Regional Plan Discussion Paper.

SANFL is passionate about creating fun, safe and inclusive environments that connect communities and allow all participants to thrive and pursue excellence. We demonstrate this commitment through our programs that are delivered to support people in community football across South Australia.

Over recent years, Australia has experienced a huge surge in women and girls participating in sports that were viewed as male only. For every female football team that existed in South Australia in 2010, there are now almost 17 teams! This has had an incredible impact on the way our clubs connect with their local community, the diversification of members in clubs and an offering to a whole new target market of people interested in football.

However, growth does have its challenges – the most significant of these being the availability of greenspace for participants to play and train.

With a current deficit of 14 ovals and a projected need for 37 more ovals by 2036, it is integral that we partner with state and local governments and other state sporting organisations to identify opportunities to unlock underutilised space and plan for functional, quality recreation space in growth areas.

Our sport significantly contributes to local community livability both socially and economically. A recent study found that community clubs contribute $1.73M to their local economy annually in addition to providing annual health benefits equal to $18,200 per participant, demonstrating the broad and often overlooked benefit football clubs have to their local community.

The attached paper provides an evidence-based overview on where we are now, our projected need, and some requirements that we believe must be considered when planning for future infill and greenfield growth.

We welcome the opportunity to discuss our submission in more detail with you and the State Planning Commission over the course of the Greater Adelaide Regional Plan consultation period. Please contact Belinda Marsh, Head of Infrastructure and Government Relations at [redacted] to discuss this further.

Yours sincerely

[redacted]

Darren Chandler
Chief Executive Officer

SANFL Overview

Formed in 1877, SANFL is a not-for-profit sporting organisation that's mission is to protect, lead, manage and deliver the promotion and development of Australian Football for the people of South Australia.

SANFL is affiliated to the national body, the Australian Football League (AFL), but is governed by the South Australian Football Commission and is the peak body for Australian Rules Football in South Australia.

While SANFL is predominantly recognised in the public domain as a state league Australian Rules Football competition, the organisation is responsible for the overall health, sustainability, and growth of the sport in South Australia. This includes promotion of the sport, facilitating opportunities for participants to engage in the sport via competition and program management, and support and education for affiliated competitions and clubs to increase their own capacity as organisations delivering Australian Football programs to communities.

53,463 total club participants	3594 Registered Coaches
11,062 Auskick participants	12,804 SANFL Juniors participants
27,479 at SANFL League Grand Final	2019 Registered Umpires
26 Community Football Leagues	272 Clubs

2022 SANFL Annual Report

The Value of Football

Football plays a significant role in our economy and supporting our health system. The more people we have playing sport (football in this case) the greater pressure we take off the health system. A SANFL commissioned report found that community football clubs deliver significant economic and social benefits to their communities.

Metropolitan Community Clubs contribute $1.73M per year in economic activity
Metropolitan Clubs support up to 7 full time equivalent jobs
Regional centre and small-town football clubs contribute an average $1.127 million and $838,000 respectively.
$18,200 in annual health benefits per participant (player and volunteers) to help prevent chronic disease and mental illness.

SANFL Community Club Socio-Economic Contributions Study – 2022

How do local football clubs contribute to the concept of "Living Locally"?

Community football clubs contribute greatly to their local communities supporting local needs and community connection, making them integral to any future planning – either infill or greenfield.

1. Community Engagement: Local football clubs often actively engage with the local community, organising events, and initiatives that bring people together. They provide a platform for people to connect, socialise, and build relationships with others in their local area.

2. Sense of Identity: Football clubs often become a source of local pride and identity. Supporting a local team fosters a sense of belonging and attachment to the community. It gives people a shared interest and a common topic of conversation, strengthening the local fabric.

3. Economic Impact: As reported in the 2022 *SANFL Community Club Socio-Economic Contributions Study,* local football clubs can have a significant economic impact on the community. They attract spectators and members from the local area and beyond, leading to increased visitation in local businesses such as restaurants, bars, and shops. This, in turn, boosts the local economy and creates job opportunities.

4. Volunteer Opportunities: Football clubs rely heavily on volunteers, providing opportunities for local residents to get involved and contribute to their community. People can volunteer as coaches, umpires, administrators, or in various other roles, helping to develop skills, build relationships, and give back to their local area.

5. Health and Wellbeing: Local football clubs promote physical activity and a healthy lifestyle. They provide opportunities for people of all ages and abilities to participate in sports, improving fitness levels and overall well-being. This can have a positive impact on the health of individuals and the community as a whole. As reported in the 2022 *SANFL Community Club Socio-Economic Contributions Study* metropolitan football clubs provide an estimated health benefit equivalent to $18,200 in annual health benefits per participant (player and volunteers) to help prevent chronic disease and mental illness.

6. Youth Development: Local football clubs are fantastic at engaging with youth (8-17years), a cohort often at risk of becoming disengaged with sport and community activities. Club football programs provide opportunities for local children and young people to develop their skills, learn teamwork, discipline, and leadership qualities. They also offer a positive and structured environment for young people to engage in constructive activities, reducing the risk of anti-social behaviour.

Current demand

Australian Football has experienced exponential growth in recent years largely driven by the increase in female participation.

Whilst this is a welcomed problem, the unprecedented growth has highlighted shortcomings in our existing football infrastructure. The various limitations include oval carrying capacity where over-use is resulting in poor oval surface quality; lack of female friendly facilities, even though venues are hosting female competitions; inadequate oval lighting provision that can be unsafe for training and matches; and poor provision of inclusive change rooms for all usage.

Currently all Adelaide Metropolitan regions (Eastern, Southern Western, Northern), the Adelaide Hills region and the Barossa Region are greatly exceeding the recommended field to player ratio (A benchmark of 175 registered players per field is recommended (7 teams x 25 players)).

SANFL Region	2019 participation	2019 field to player ratio	Existing number of fields (2019)
Eastern Adelaide	3239	324	10
Southern Adelaide	15265	449	34
Western Adelaide	5166	397	13
Northern Adelaide	13968	268	52
Adelaide Hills	5326	231	23
Barossa	2823	176	16

SANFL Infrastructure Plan 2022-2032

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

Whilst we recognise the desire for all forms of urban infill and support regeneration of housing stock, it must be noted that the proposed areas of investigation, namely the east, west, north and south corridors beyond the CBD, have football facilities that are already experiencing issues as a result of being over capacity based on a field to player ratio benchmark of 175 registered players per field.

Case Study

The Plympton Football Club in the western suburbs has grown to almost 500 registered club players in 2023. The popular club brings people together, supports local families and businesses and creates a sense of connection. In 2022, Plympton Football Club was awarded the SANFL Juniors Club of the Year Award recognising excellence in club governance, development, and behaviour.

The multipurpose facility at Plympton Oval is landlocked and surrounded by medium density dwellings and will soon have an additional 400 residential dwellings developed by its neighbouring land Morphettville Racecourse.

Currently hosting football, soccer and cricket at the site, the built form facility does not meet contemporary needs including female friendly/child safe amenities, storage, lighting, spectator amenity and of greatest concern, a quality year-round playing surface.

A further increase in population in the surrounding areas will further contribute to the current squeeze.

SANFL is working closely with Plympton Football Club to source additional greenspace for them to train. Local school sites are the focus, but these are difficult to secure due to barriers including funding, planning requirements and schools just not allowing access.

Clubs surrounding Plympton are also at capacity (PHOS, Edwardstown, Glandore Oval) making the option to disperse participants difficult as well.

Based on the 2021 Census data and the projected populations for the Adelaide Western metro area (LGAs: Charles Sturt, West Torrens, Holdfast Bay, Marion) there is a potential increase of approximately 10,000 additional residents by 2036 just in the football targeted age cohort of 5-39years. With current penetration rates for male and female participants, this results in football having approximately an additional 700 players in need of quality facilities in this local area that, as demonstrated above, is already bursting at the seams.

Projected Demand

We know that we are already at a deficit for ovals in the Adelaide metropolitan area based on the industry benchmark (175 players per oval). Combine this with the most recent census data and population projections, we need a considerable amount of oval space to ensure the ongoing sustainability of our game.

The below table illustrates oval requirements across South Australia based on current, medium and high penetration ratios. The data reflects the NET number of ovals required across the State and takes into account Regional areas that are underutilised.

Ovals & Teams - 2022		
2,321 Teams	318 Current Ovals	332 Req'd Ovals

Growth in Teams			
	2026	2031	2036
Teams Same	+1	+1	+1
Teams Med	+145	+191	+228
Teams High	+369	+419	+460

Oval Requirements			
	2026	2031	2036
Ovals Same	+26	+32	+37
Ovals Med	+34	+41	+46
Ovals High	+66	+74	+79

**Calculated based on 25 players per team and 7 teams per oval*

The below table illustrates the GROSS number of ovals required in independent local government areas and provides a more concerning position.

LGA	Current ovals	Total required ovals by 2031
Onkaparinga	16	32
Tea Tree Gully	5	19
Charles Sturt	10	22
Marion	7	18
Salisbury	9	17
Pt Adelaide Enfield	13	16
Unley	2	8
West Torrens	5	11

Greenfield development

The proposed greenfield development locations are commensurate with our identified growth areas, particularly northern Adelaide areas of Light Regional and Adelaide Plains Councils.

Australian Rules Football is extremely popular with residents in Light Regional Council. They have double the state average for Auskick participants and almost double the state average for community club participants. With further development planned in this area, we propose that sport and recreation is strongly considered, particular AFL standard size oval space.

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

Greenfield development opportunities provide a blank canvas for comprehensive planning and design. It allows for the creation of well-designed, integrated communities with carefully considered infrastructure, amenities, and open spaces. This can result in more efficient land use, improved connectivity, and enhanced liveability for residents.
SANFL sees opportunities in these areas to grow existing clubs and to introduce new clubs to provide a sustainable future for our sport whilst enabling the Living Locally concept.

<u>Case Study</u>
City of Casey - Casey Fields
The City of Casey is one of Australia's fastest growing regions. Exceptional planning and partnerships have ensured that the City meets recreation and liveability needs of its new residents.
In less than two decades, Casey Fields has grown from 87-hectares of farmland to a complex boasting more than 30 fields, tracks and courts for professional and community sport. Supporting the development is a dedicated train station proposed as part of the future Clyde Rail extension. Casey Fields is one of Melbourne's prominent regional sporting facilities. The scale and status of the site provides the ideal setting for elite sport and major events that attract visitors, bring Casey residents together and create a more prosperous and resilient economy. Local pathways are also provided into higher levels of sporting competition for a diverse community. Casey Fields is unique as an elite-level precinct, whilst being open and accessible to the public for their own recreational pursuits. The sum of offerings at Casey Fields results in a healthier, more inclusive and more connected community.

GARP considerations

Access and investment into school ovals

School sites provide the best opportunity for sporting organisations to become sustainable and meet the demand on population growth. They are vacant during the hours needed for sports (4-8pm weekdays and during the day on weekends) and have existing amenity to meet football needs such as changerooms, toilets, shelters and some carparking.

However, significant barriers exist to co-location at these sites.

- Accessibility is dependant upon the approval of the School Principal. Where Principals are not open to discussions, vacant greenspace remains underutilised.
- Investment into the site must be made into these facilities to ensure they can be utilised fully. This includes oval lighting and an increase in turf maintenance, including irrigation upgrades. Long term user agreements are necessary to unlock funding opportunities. School budgets are particularly difficult to access for this purpose, as are Local Government funds as schools are usually on State Land. Sport can not fund and maintain these facilities alone and a co-contribution model is required.
- School sites need to be included in the Local Government Open Space and Recreation Plans so that their benefit can be maximised by the community. The City of Playford has recently been successful in including Playford International College in their Open Space planning and have delivered a lighting project on the school oval to support local football. It is an exceptional example of various stakeholders working together and fully utilising existing amenity.

Some excellent recent examples where co-funding models have delivered benefits for schools and sports include Henley High School, Cardijn College and as mentioned above, Playford International College.

Support for Growth Councils

It is acknowledged that most open space and recreation needs in new greenfield developments will be the responsibility of the local government body. With resources thinly spread at this level of government, support needs to be provided to ensure greenfield sites are liveable and offer recreation activities for local residents. We have identified some examples of how interstate governments have supported growing suburbs for your consideration.

VIC Country Football Netball program

This program is open to LGAs only and has different ratios of funding available depending on the location of the LGA. This supports the growth suburbs to develop recreation facilities for active sports.

Funding available	Local Government Authority (LGA)	Funding Ratios
Up to $250,000**	**Rural LGAs**	SRV $3 : $1 local
	Regional/Interface LGAs Ballarat, Greater Bendigo, Greater Geelong, Cardinia, Casey, Hume, Melton, Mornington Peninsula, Nillumbik, Whittlesea, Wyndham, Yarra Ranges	SRV $2 : $1 local
	Metropolitan LGAs Greater Dandenong, Kingston, Frankston** *Only clubs competing in leagues affiliated with AFL Victoria Country are eligible to receive funding*	SRV $1 : $1 local
**Applicants may claim in-kind expenses to a maximum of 50 per cent of the total project cost.		

Growing Suburbs Fund

The Growing Suburbs Fund supports LGAs to build the facilities needed to support healthy and liveable communities in Victorias fastest growing suburbs. The Growing Suburbs Fund (GSF) provided an investment of $425 million over 8 years between 2015-16 and 2022-23 in critical local infrastructure in Melbourne's diverse and fast-growing outer suburbs including multi-purpose sports pavilions inclusive of changerooms, storage, medical rooms and social areas.
Since its establishment in 2015, the Growing Suburbs fund has supported 346 projects representing a total infrastructure investment of $1.227 billion and has created over 11,340 jobs.

References

- 2022 SANFL Annual Report
- SANFL Community Club Socio-Economic Contributions Study – 2022
- SANFL Infrastructure Plan 2022-2032
- AFL Tableau – Participation and Ground Forecasting - October 2023
- Victoria Country Football Netball Program - https://sport.vic.gov.au/grants-and-funding/our-grants/country-football-and-netball-program
- Growing Suburbs Fund - https://www.localgovernment.vic.gov.au/grant /growing-suburbs-fund
- Casey Fields - https://www.casey.vic.gov.au/managing-our-growth
  And https://www.casey.vic.gov.au/casey-fields

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 2:34 AM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: SWWAN-Proposal-For-a-Resilient-Future-GARP-Review-2023.pdf; Impact-of-Airbnb-on-Adelaide-Rental-Market-SWWAN-2023.pdf; Inadequate-Urban-Canopy-Cover-Targets-SWWAN-Oct-2023.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	Matthew
Family name:	Farrell
Organisation:	Sellicks Woodlands and Wetlands Action Network (SWWAN)
Email address:	sellickswoodlands@gmail.com
Phone number:	[redacted]
Comments:	SWWAN are making three submissions to the GARP Review. 1. Major Submission - Proposal for a Resilient Future. A proposal to reverse biodiversity loss, address climate change and fix the housing crisis in the Fleurieu Peninsula. The projected need for housing is overstated and the need for environmental restoration to protect agriculture and our food security must take precedence. We ask the State Government to end all greenfield housing developments and embark on an ambitious plan to save biodiversity in the Mount Lofty Ranges by rewilding the Fleurieu Peninsula. 2. The Impact of AirBnB on Adelaide Rental Market. AirBnB represents 69% of vacant houses in the Adelaide rental market. We use the same data Victoria used to set their Airbnb tax to show the significant impact short term rentals are having on vacancy rates. We don't have a housing crisis, we have a rental crisis. Small changes in policy to curtail short term rental financial advantages and encourage a shift to long term rentals by landlords will have an large and immediate effect on vacancy rates. 3. Inadequate Canopy Cover. Councils around Adelaide have set dangerously low 2045 canopy cover targets because of a misinterpretation Target 5 of the Greater Adelaide Plan in 2018 resulting in targets 60-90% below urban planning health recommendations. All councils have significantly underspent on tree planting over the last five years putting all Greater Adelaide residents at a highly elevated risk of heat related illness in the coming years. This must be dealt with urgently.
Attachment 1:	SWWAN-Proposal-For-a-Resilient-Future-GARP-Review-2023.pdf, type application/pdf, 2.1 MB
Attachment 2:	Impact-of-Airbnb-on-Adelaide-Rental-Market-SWWAN-2023.pdf, type application/pdf, 83.8 KB
Attachment 3:	Inadequate-Urban-Canopy-Cover-Targets-SWWAN-Oct-2023.pdf, type application/pdf, 1.3 MB
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Sellicks Woodlands and Wetlands Action Network (SWWAN)

Submission to Greater Adelaide Region Plan Review
6th November 2023.

SWWAN was founded in 2020 to oppose greenfield housing developments in the Sellicks Beach area and to advocate that the land instead be conserved for environmental restoration as an essential response to the extinction crisis.

In support of this we present an evidence-based plan for the wider region of the Willunga Basin and Fleurieu Peninsula that addresses the existential threats to South Australia of biodiversity loss and climate change, protects our agricultural industries and addresses the housing crisis. Our plan respects the cultural significance of the land. SWWAN consider the healing of Country as an essential part of reconciliation.

Since the last update of the 30-Year Plan Greater Adelaide Plan (30-Year Plan),
our world has changed significantly and the knowledge of the threats posed to us by biodiversity loss and climate change have expanded greatly. The environment is collapsing because of biodiversity loss and the effects of climate change are being felt across the world. The need for housing is no longer, and hasn't been for some time, on the peri-urban fringe of Adelaide but in sustainable urban infill closer to the city centre with a priority on social housing.

As a significant measure against biodiversity loss in the Mount Lofty Ranges region, SWWAN proposes that the South Australian Government partner with community and stakeholders over the next decade to create the Willunga Basin Coast Conservation Park as part of a larger program over the next two decades to Rewild the Fleurieu and reverse the extinction crisis. We strongly urge the state government to undertake this project for the benefit of all South Australians.

Sincerely,
The SWWAN Committee.

SWWAN'S PROPOSAL FOR A RESILIENT FUTURE

REWILD THE FLEURIEU &
THE WILLUNGA BASIN COAST CONSERVATION PARK

SWWAN propose that in response to the existential threat posed by biodiversity loss to our agricultural industries and jobs, our food security and future, that the Willunga Basin coastline be protected from further urban development and that the Willunga Basin Coast Conservation Park, following the Tjilbruke Dreaming Trail, be created from Maslin's Beach to Sellicks Hill as part of a wider Rewild the Fleurieu project to protect the Willunga Basin food bowl and ensure a productive and resilient Fleurieu. This potentially could also be achieved by extending the McLaren Vale Preservation District to the coast.

We propose the Willunga Basin Coast Conservation Park as a continuous conservation zone protecting the last open space on the metropolitan coastline and the only place where the hills meet the coast. The park will extend South from Maslins Beach between South Road and the coast, wrap around the existing townships of Port Willunga, Aldinga, and Sellicks Beach, buffer the Aldinga Scrub and Washpool Conservation Park, and climb up to a restored eucalyptus grassy woodland that would have once overlooked Sellicks Beach. (Figure 1 next page)

Our vision is that this new conservation park could one day connect north to the Onkaparinga National Park, and south along the Fleurieu Coast through to Cape Jervis as part of a larger Rewild the Fleurieu project. The establishment of the Willunga Basin Coast Conservation Park would create a unique conservation park that would cover several significantly different ecosystems and land types and their transitional zones. The park will contribute to the protection of productive and cultural landscapes and increase biodiversity in the wider Willunga Basin. It will keep the enclosed urban areas cooler, build resilience into our local agriculture industry, create diverse tourism opportunities and jobs in the area and maintain the current residents' quality of life.

By restoring the Willunga Basin coast's native vegetation, we will be contributing to preserving biodiversity in the area and the ecosystems we rely on for food, clean air and water. In doing so, we will not only help restore our environment and save species from extinction, but we will grow our economy, make our community more resilient, healthier, and better prepared for the problems associated with climate change.

Figure 1. Mud map of the proposed area of the Willunga Basin Coast Conservation Park. Incorporating the townships of Port Willunga, Aldinga, Aldinga Beach and Sellicks Beach, and the Aldinga Scrub and Washpool Conservation Park.

The Issue

BIODIVERSITY LOSS

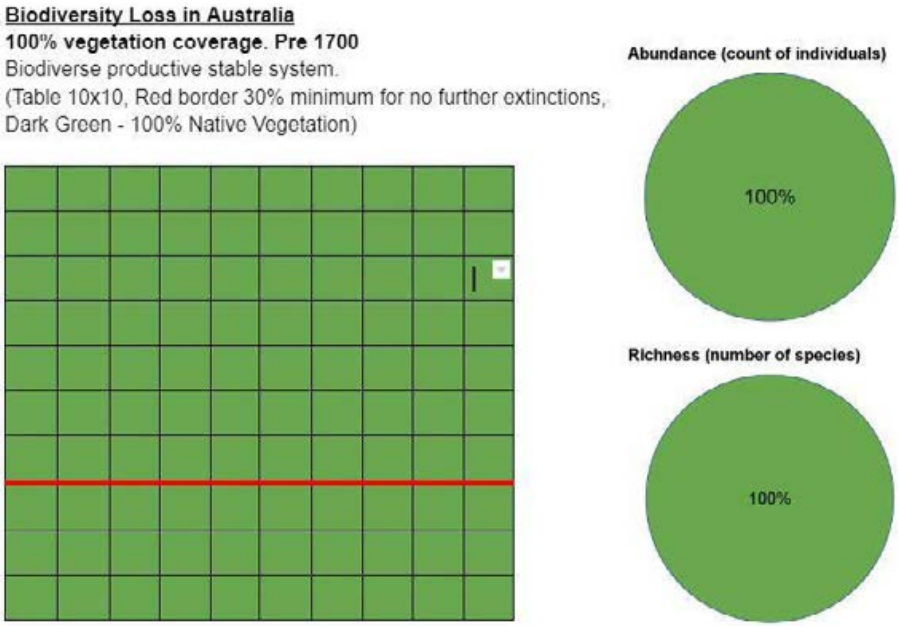
The extinction crisis is the biggest threat to the future of South Australia. The predicted collapse of the environment in 50-80 years time will devastate our agricultural industries, threaten our food security and is irreversible. The evidence for species loss and the threat posed by ecosystem collapse is overwhelming and addressing it must be a priority for all governments.

Biodiversity loss and the extinction crisis are driven by a lack of resources because of centuries of clearing habitat for our cities and farms. Biodiversity loss is commonly confounded with climate change but the key driver of biodiversity loss is the historic clearance of more than 90% of habitat across the arable regions of Australia.

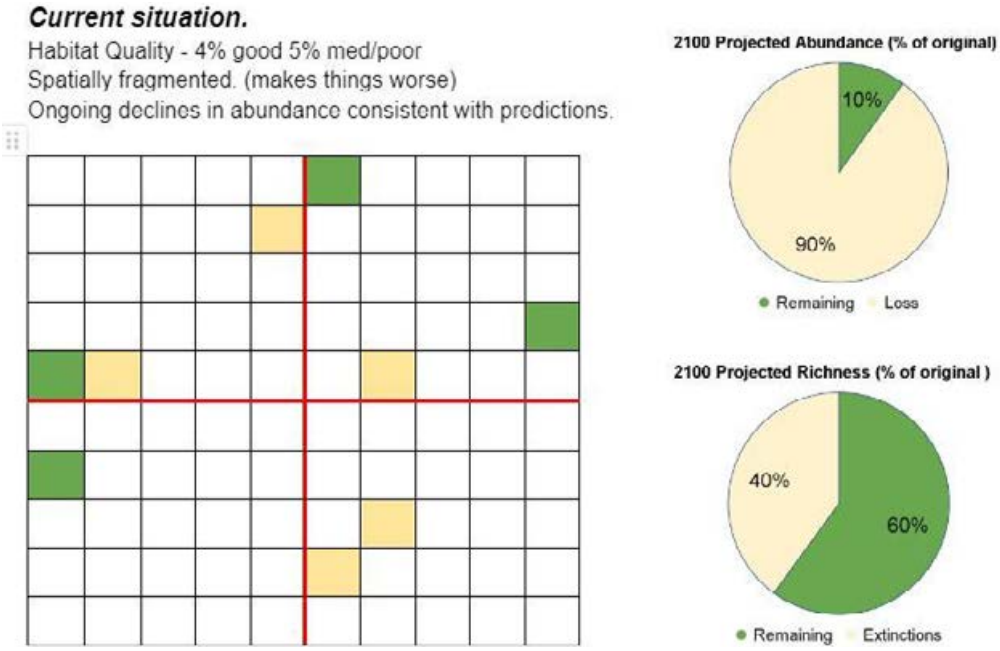
This loss of habitat represents a shortage of food, shelter, hiding places, escape routes, places for mating and raising babies, which over time results in population declines and eventually extinctions. In economic terms we have overspent our natural capital and now owe a significant extinction debt. Climate change will make this worse but solving climate change won't fix these problems.

Figure 2 Aldinga Scrub looking southeast from the dunes lookout.2021.

A quick ecology lesson.



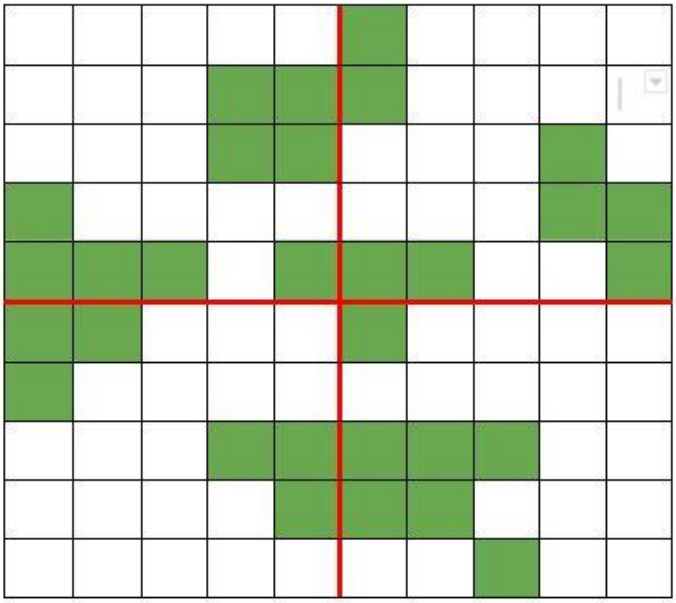
Since colonisation we have cleared approximately 90% of our natural capital and we now owe a significant extinction debt. There is a long temporal delay, 50-80 years at current rates of decline, between the loss of habitat and the decline of faunal populations to meet the new resources level. If allowed to reach this level we will see 30-50% of species go extinct by 2100. This is the extinction debt we owe[1].

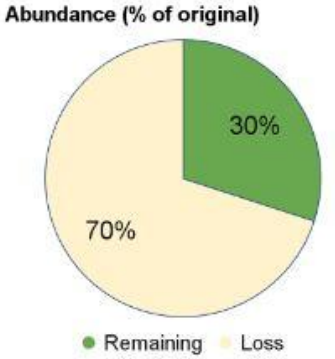


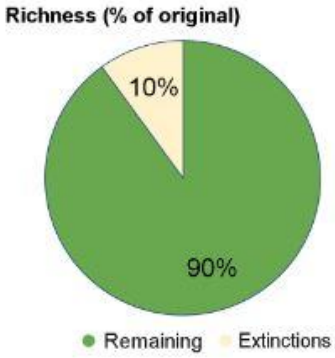
[1] *2017 SA Gov Environment Resources and Development Committee* 53rd Parliament, Environment Resources and Development Committee Completed Enquires Report 78/ Biodiversity.28/03/17

We can pay the debt in extinctions or invest now to rebuild nature before the debt is due.

Goal. Needed to prevent ecosystem collapse.
Greater than 30% contiguous, good quality, heterogeneous habitat.
Achievable in 25-50 years.







The temporal delay means we have a window of opportunity to restore habitat to the 30% minimum required for no further extinctions. The scale of the work required is considerable. Within the Mt Lofty Ranges 150,000 hectares of new restoration are required, or over a century of work at current rates[2]. This can be scaled up to achieve the target in the time frame required of the next 50 years, but we must start now by protecting farmland from greenfield development and prioritising broadscale restoration programs commensurate with the scales required.

The map of the Willunga Basin (next page) shows how only (9%) native vegetation is left and located on the edges of human use. Additionally the habitat is highly fragmented and in poor condition due to invasive weeds. To maintain functioning ecosystems to provide us with food, we need habitat coverage of at least 30% throughout the landscape[3] of contiguous, good quality, diverse habitat. Below this we will continue to see declines and extinctions and be impacted by the effects. Protecting the 10% left is not enough.

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[2] *BioR Strategic Plan 2023-2028 From Cleared Lands to Woodlands BioR accessed Aug 2023.*
[3] *UN 30x30; Koalas, parrots, frogs and orchids share our cities. It's key to protect each one's habitat, not just 30% of all land Simon Kilbane, The Conversation, Nov 2023.*

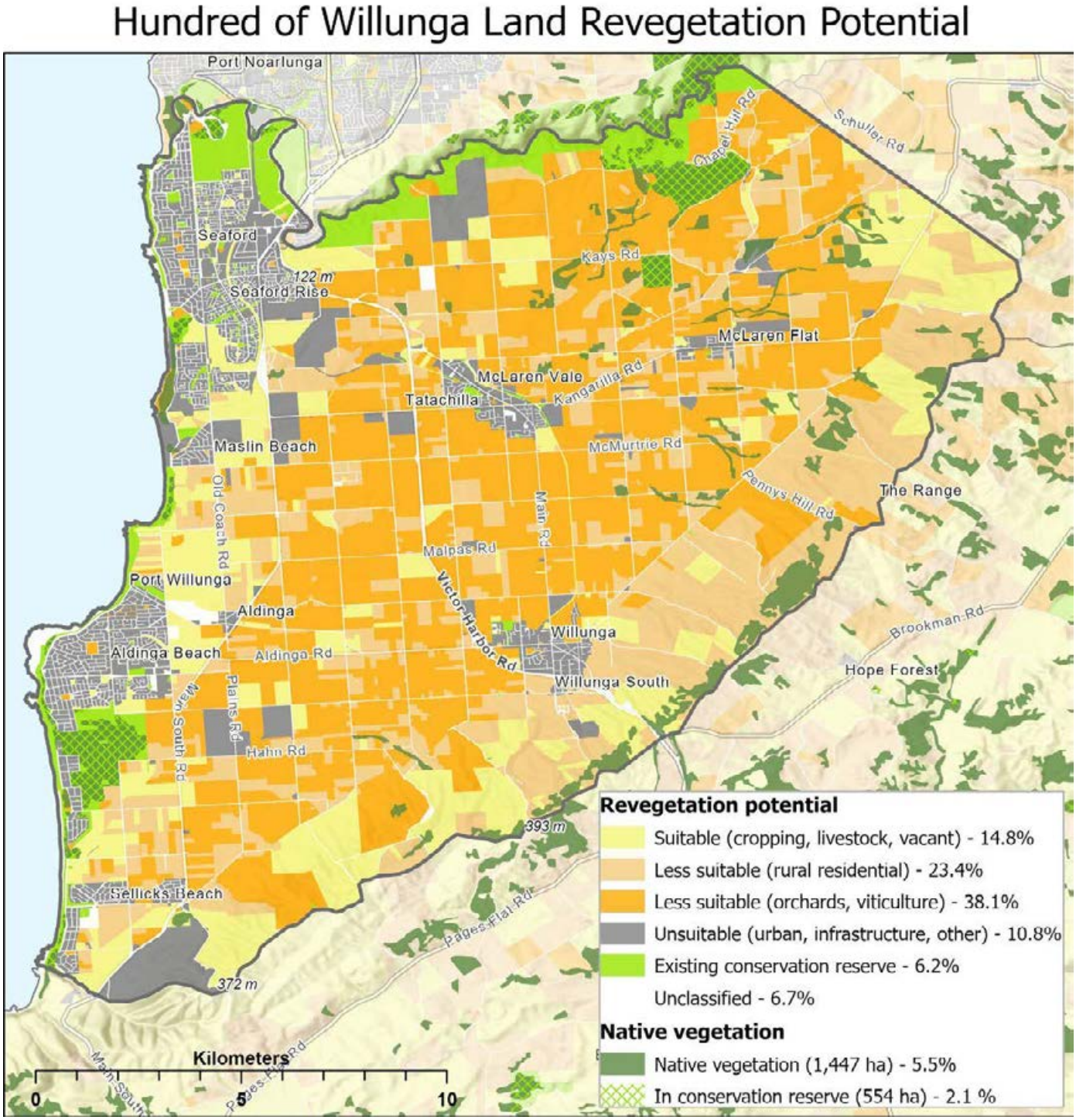

Figure 3. Land use map of the Willunga Basin. I Ahmer, University of Adelaide, Dec 2023 for SWWAN.

Benefits

The prevention of further extinctions by restoring the environment will have widespread benefits in the future beyond this primary goal. These include;

Agriculture and Food Security

Farmers from the largest vineyard to the smallest backyard garden in the Willunga Basin will benefit from the restoration of a coastal vegetation buffer and the ecosystem services it will provide. By protecting biodiversity, we will ensure our agricultural community is resilient and better prepared for the future. The most obvious benefit to farmers is the protection of pollination services.

Nearly three quarters of all major crops, representing a third of the world's food supply, are dependent on pollinators[4]. For some crops, such as watermelon, almonds, apricots and cherries, pollinators are essential, others, like strawberries, tomatoes, oranges and many oil crops, will be adversely affected in quality and quantity[5]. Native wildlife also provide important pest control services. A study by R Paisley (2017) from Charles Sturt University showed that the presence of native vegetation close to agriculture has a net positive effect with a 10-20% premium in productivity over sites without nearby vegetation[6].

A loss of ecosystem services will be calamitous for the agricultural sector particularly society in general. To ensure the resilience of our food supply, our agricultural economy and the jobs that go with it, we must treat the environment as the irreplaceable asset it is and act now to repair it before it's too late.

Economic

While the economic gains from urban construction will quickly pass, the jobs and indirect stimulus for the local economy created by undertaking a generational restoration project of this size will last decades. Every worker becomes a customer when they knock off.

Aside from the direct economic stimulus of the restoration work, the creation of a conservation park along the Willunga Basin coast will provide long term benefits to many other industries, particularly tourism and retail. The benefits to local agriculture will be substantial through ensuring the resilience of the industry to continue operating, employing people, and providing a

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[4] *Ecosystem collapse 'inevitable' unless wildlife losses reversed | Biodiversity | The Guardian* *D. Carrington 25.2.2023*

[5] *H Ritchie 2021. How much of the world's food production is dependent on pollinators?*

[6] *Peisley, R. (2017). The benefits and costs of bird activity in agroecosystems. [Doctoral Thesis, Charles Sturt University]. Charles Sturt University.*

great product. Tourism will be a huge winner from restoring the environment and the overall economic stimulus will in turn create more jobs in the service, retail and other industries.

Community Health

The existing communities of the Willunga Basin will benefit from the cooling effect of the trees, reduced pollution, and most importantly, reduced risk of heat related health problems associated with urban heat in the future, which is recognised as a significant health issue. The value of nature to the economy is currently estimated in the $100s of millions in avoided healthcare costs[7]. This will be even more important in the coming decades, and it is imperative we act now to make our communities climate ready communities to avoid the associated social and financial costs[8].

Cultural Values

The area is on the lands of the Kaurna nation and the Tjilbruke Dreaming Trail passes through the entire area from North to South. This Dreaming story is a very significant story in Kaurna culture and there are a number of significant cultural sites in the area. The creation of the Willunga Basin Coast Conservation Park is an opportunity to continue reconciliation of our history through restoring Country.

Tourism

Imagine if instead of Lonely Planet making Kangaroo Island the 2nd best place to visit that it was the whole Mount Lofty Ranges. In a generation it could be. The creation of a new conservation park on Adelaide's southern metropolitan coast linking to the parks of the Fleurieu will be a massive boost to tourism state-wide and a valuable diversification of the local market heavily dependent on the wine industry. Hiking, birdwatching, and other outdoor activities will create jobs and economic activity both directly and indirectly. As an example of the economic opportunities available, more people went bird watching in Australia than visited the Great Barrier Reef in 2019[9] and in the United States birdwatching is worth $41billion annually[10].

Education and Research

Restoring the 90 hectares of land between Aldinga Payinthi College and Aldinga Beach Road, currently under cropping and previously earmarked for housing and infrastructure, would be a

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[7] SA outdoor economy Marsdon-Jacon 2020 Avoided Healthcare costs p2

[8] WHO Climate Change and Health Fact Sheet

[9] Courier Mail bird-watching-is-taking-flight

[10] Daily Beast Withrow (2019); Schwoerer T, Dawson NG (2022) Small sight—Big might: Economic impact of bird tourism shows opportunities for rural communities and biodiversity conservation. PLoS ONE 17(7): e0268594. https://doi.org/10.1371/journal.pone.0268594

unique long term environmental educational opportunity for the new high school. Students from R-12 could be involved in all aspects of restoration, preparing many for careers in environmental science and all gaining a greater appreciation for our natural environment.

The need for greater research into understanding ecological restoration is constantly cited in academic papers on the subject. The large scale of this proposal in general and its proximity to metropolitan Adelaide will provide researchers from our universities and around the world with a unique study site to further restoration science and help save the world.

Other issues

There are a number of other issues to be considered in this discussion aside from the threat of biodiversity loss which we address here. We must consider the declaration of the Climate Emergency and what measures are needed to protect our communities from the health risks of climate change, particularly urban heat. What is the cause of the housing and rental crisis and what are the best solutions? We also consider landholders rights and propose options to cover a variety of scenarios as well as the question of anticipated returns on investment for developers and land bankers.

CLIMATE CHANGE

The South Australian Government has declared a "Climate Emergency[11] in response to the global need for action. In the 'State of the Climate 2022'[12] Report, the Bureau of Meteorology (BOM) stated that Australia's climate has warmed by an average of 1.47 ± 0.24 °C since national records began in 1910. The International Panel on Climate Change (IPCC)[13] warned us that even if all countries meet current emission reduction pledges, the world is still on track to exceed 2℃ of warming.

While much of the discussion on how to deal with the climate crisis centres on the environment and economics, the biggest threat to individuals and communities are the health risks associated with a warming planet. Climate change poses risks to health through increased risk of heat related health issues, increased risk to pollution-related illnesses and mental health issues[14]. There is the risk to the lives of people through catastrophic weather events such as the

[11] South Australian Climate Emergency Declaration
[12] State of the Climate 2022 BOM
[13] IPCC Report on Climate Change
[14] WHO Climate Change and Health Fact Sheet

Black Summer bushfires and the recent floods, the increased risk of disease and the loss of food and water security[15].

Restoring the natural environment is one of the best ways to act on climate change. Plants draw down carbon from the atmosphere and the restoration of natural environments will keep our communities cooler and reduce the health problems associated with climate change. Aside from being essential to the ongoing viability of agriculture, native vegetation will build resilience into these industries already experiencing declines in productivity from a warming planet. In recognition of this, all levels of government have acknowledged the need to plan for a changing climate, and have policies and initiatives in place to help prepare our communities. We have a responsibility to prioritise these initiatives in the Greater Adelaide Regional Plan..

HOUSING CRISIS

Outdated urban expansion plans do not address the causes of the housing crisis, the rapidly changing needs of our modern world nor the needs of the future. Continued urban expansion will limit our ability to restore the environment to the minimum levels needed around our agricultural areas. The housing crisis is not founded in the need for new homes, it is a lack of affordable long term rentals that is driving the exponential rise in homelessness.

Holidays or Homes

The effect on supply of the short-term rental and holiday market as it has grown over the last decade is often overlooked in housing discussions. Table 3 compares the number of vacant properties and those listed on AirBnB[16][17]. The figures show that over two thirds of vacant houses in the Greater Adelaide area are reserved for holidays instead of homes. In Aldinga, where the rental crisis is being felt acutely, the ratio of Airbnb to available rentals is over 9 to1.

Table 1 Comparison of advertised rental properties examining the impact of short term rentals in Aldinga SA@, the City of Onkaparinga and Greater Adelaide.

Vacant Dwellings (March 2023)	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Rented properties	1,509	15,402	152,198
Vacant Rentals	24	258	1,309
Air BnB Listed Dwellings	252	564	2,972
Total Vacant Dwellings (Lng+AirBnB)	276	822	4,281
AIrbNB % (AirBnB/Total Vacant Dwellings)	91.3%	68.6%	69.4%

[15] *WHO Climate Change and Health Fact Sheet*

[16] *RealEstate.com.au – Search for vacant rentals 29/07/23*

[17] *Inside AirBnB, www.insideairbnb.com , data provided by Liss Ralston, Inside AirBnB, June 26 2023*

The government's plan to address the housing crisis by building more houses is targeted at the wrong sector of the market. Our housing crisis is due to a shortage of rental homes and this is where the government should act. While incorporating more social and affordable housing into future developments will help in the future, families cannot live in their cars for years waiting. Encouraging landlords to switch to long-term leases as a priority will reduce the number of families in difficulty right now.

Short-term rental advocates will argue as to the economic benefits brought by the service they provide. The counter argument to this is to consider an equivalent number of families living in these homes contributing not just economically but becoming part of these communities. The economic benefits would also be felt in a reduction in demand for crisis services and other social support services associated with the rental crisis we are currently experiencing. There would also be a reciprocal benefit to hotel and motel operators throughout Greater Adelaide.

The desire of landlords for greater financial returns has been the main driver of the switch from long-term to short-term rentals over the last decade. To reverse the rental housing crisis, it is important to address the financial incentive directly. Here are a number of ways that this could be done.

Council Rates: (both together)

- Increase council rates of short-term rentals to commercial hotel rates. Rates should be set on the use of the building, not its shape.
- Discount rates for landlords offering long-term leases.
    - e.g., 1 year - 10% off, 2 years - 15% off, 3 years – 20% off.

State:

- Set limits on the number of days a property can be used for short-term rentals.
- Consider a land tax to replace stamp duty to increase the ongoing costs on vacant properties.
- Increase safety compliance on short-term rentals to commercial hotel standards. Safety should be based on use, not the shape of the building.

<u>How many houses?</u>

The most recent population projections to 2051 say that at the highest population growth scenarios Greater Adelaide's population could grow by 672,000 people and require 300,000

new homes by 2051. This growth is unexpected though and the expected growth pathway is for the medium growth scenario of 489,000 people and a need for 218,000 new dwellings[18].

Between 2016 and 2021 South Australia had built 52,000 dwellings and the population increased by 79,000[19][20]. This results in approximately 17,000 homes more than required than in the highest population high growth models. Plan SA states on its website there are 139,000[21] homes already approved, these are enough to cover the highest population growth to 2036 at an occupancy rate of 2.24 people per dwelling. (Note: This figure used by the government is considerably lower than the 2021 census which puts the figure at 2.4)[22].

In the most likely growth scenario of medium population growth these already approved homes are enough to cover population growth past 2041 and only a further 79,000 dwellings are required to house population growth past 2051 (Figure 4, next page). This can easily be achieved through urban infill and strategic infill over the next 30 years.There is no need for greenfield development.

This analysis shows that the release of new land for development at Sellicks Beach, Aldinga and Hackham is not necessary as there is already enough development in the pipeline to employ builders for the next 14 years and cover expected population growth beyond 2041 without resorting to greenfield development. On the other hand it is imperative that we begin work on restoring the environment as soon as possible given the scale of the problem and the time forests take to mature.

The GARP discussion paper correctly identifies urban infill, strategic infill and urban corridor development as areas where significant opportunity for housing exists. The numbers expected to be achieved through these measures in the future is not accounted for in the GARP discussion paper but will contribute to increasing the housing supply with greater choice, density and amenities than greenfield housing and at a lower cost to the government.

As dwelling construction has been outpacing population growth requirements since 2016 and will continue to do so even under the highest growth projections, the housing crisis is not a result of a lack of new housing supply. This supports our conclusions that short term rentals affecting long term rental availability is the real cause of the housing crisis.

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[18] *Population projections | PlanSA* *accessed Sept 2023*
[19] *ABS Building Activity South Australia* *accessed Sept 2023*
[20] *Recent population change | PlanSA* *accessed Sept 2023*
[21] *Plan SA Residential-land-release-and-rezoning* *accessed Sept 2023*
[22] *2021 Adelaide, Census All persons QuickStats | Australian Bureau of Statistics* *accessed Sept 2023*

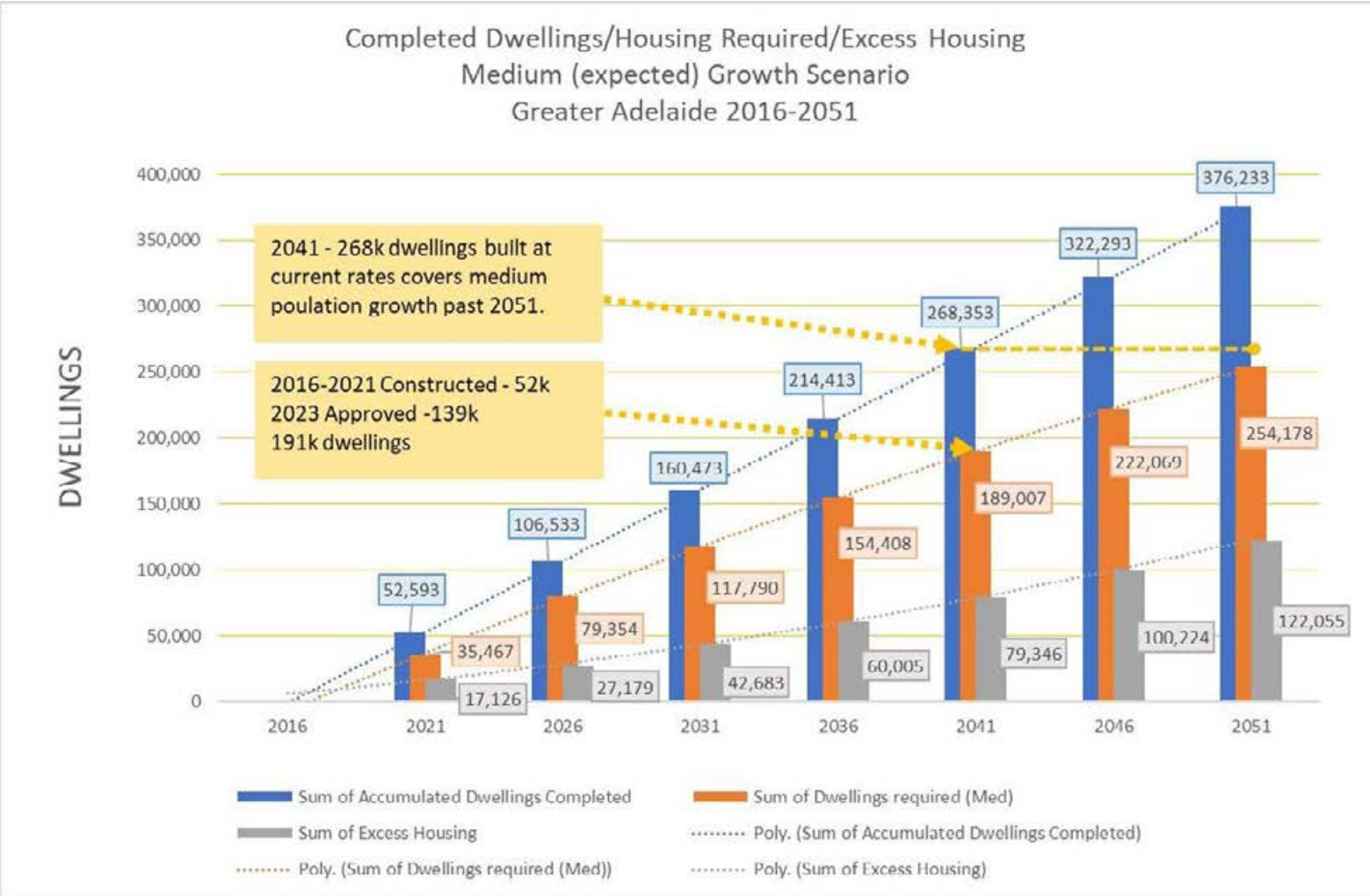

Figure 4. Chart showing data from 2016-2051 of completed dwellings and projected dwelling completions (blue), actual and expected population growth of Greater Adelaide expressed as the number of dwellings required at 2.24 persons per dwelling (orange) and excess houses (grey) as a result of construction outpacing population growth. Data uses Plan SA Population growth figures and ABS Construction statistics 2016-2051. Dwelling construction per year was set at 10,788, the average for the period 2016-2021.

Urban infill

The latest urban development policy research shows that the most beneficial new housing for South Australia will come from medium density infill[23], in established suburbs with infrastructure capacity[24], with a priority on social housing linked to services and infrastructure[25]. This is where we should be prioritising our housing plans. In addition to plans for increased urban infill, strategic infill and urban corridor development, opportunity for further densification of suburbs will come as Adelaide's population becomes older and downsizes large homes in the low density areas.

Greenfield housing is more expensive to society. A literature review and a case study of major development sites in Bowden and Playford Council by Cathryn Hamilton and Jon Kellett (2017)[26] found the costs associated with infrastructure provision to the bowden infill development site was one third the cost of Playford Councils greenfield sites.

Another study, Design Perth[27], made similar findings and additionally provided estimates of the extra transport costs due to longer commute times, extra car ownership and use, and parking costs that fall on individual householders and the broader economic costs to the environment, health and productivity of greenfield housing. These all showed a significant greater ongoing cost for individuals and society associated with greenfield housing when compared to infill.

Despite these findings there is resistance on the part of the development industry to follow current urban growth policy. Hamilton and Kellett (2017) suggest there is some evidence that the developer's construction costs can be higher in infill situations, and hence lower profits, which may explain this. We ask that the government show leadership and plan for our communities future rather than the current plans which put developers retirements first.

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[23] Planning to Prosper | Urbis p71

[24] Cathryn Hamilton & Jon Kellett (2017) Cost comparison of infrastructure on greenfield and infill sites, Urban Policy and Research, 35:3, 248-260, DOI: 10.1080/08111146.2016.1274257 p259

[25] ABC News Jul 2022 South Australian Public Housing Shortage

[26] Cathryn Hamilton & Jon Kellett (2017) Cost comparison of infrastructure on greenfield and infill sites, Urban Policy and Research, 35:3, 248-260, DOI: 10.1080/08111146.2016.1274257 p258

[27] Design Perth 2017 p51

LAND OWNERSHIP AND STAKEHOLDER ENGAGEMENT

The land proposed for the Willunga Basin Coast Conservation Park is owned by government, private owners, businesses and investment companies. SWWAN is proposing several options for collaboration between all stakeholders to facilitate the creation of the park.

We propose that all government owned land be transferred to the Department of Environment and restoration work begun immediately. Another option for government owned land is for ownership to be transferred to the Kaurna Nation.

Where land is suitable for restoration but owned privately, options could include, but are not limited to:

1. Sale – The land is bought outright by the government for a fair price and transferred to the Department of Environment as custodian of the land.
2. Sale with option to stay – Owners sell the land to the government for a lesser amount and are given an ongoing paid role in the restoration of the land. This will allow owners who live on the land to stay on their property and be a part of the project. [a]
3. Partnership – Partner with Government or third-party organisation to remain in possession of the land and undertake the restoration works themselves. [a b]
4. No immediate restoration – This option is particularly applicable for land currently used for vineyards and orchards where owners may want to continue to operate their businesses while the park is built around them. [b]

[a] In options 2 & 3 training and certification in Conservation and Environmental Management could be offered in some form.

[b] In options 3 & 4, though the owners retain ownership, the only option for eventual sale is to the government for the conservation park.

LAND VALUE and INVESTMENT

All investments come with risk. Sometimes it is high, sometimes low, but there is always risk involved in speculation. Speculators have invested in the land along the Willunga Coast, and in particular around Sellicks Beach and Aldinga, for decades in the hope of profiting from the area's eventual urban development. Unfortunately, during the last several decades, the world has changed, and so too has society's needs for the future.

The need for restoration and action on biodiversity loss is paramount and must take priority over unnecessary development for the sake of future communities. The housing needs projected last century, even last decade, that these investors banked on are no longer here (if they ever were)

and are now closer to the city. Unfortunately for these investors the risk has been realised. The situation has changed and a changing world and the greater need for the land, restoring biodiversity, should preclude any further greenfield development in the Willunga Basin..

Although the expected profits associated with securing the land for development will not be realised, landowners have many options to secure a fair return. Sale to the government for establishment of the conservation park will be at a fair price. Options to stay can come with returns from Carbon Credits and other income opportunities. The only option no longer on the table is urban development.

THE COST

We have not costed our proposal for the Willunga Basin Coast Conservation Park or the wider Rewild the Fleurieu proposal because whatever the cost will be to restore the environment, it will be less than the cost of losing everything if we don't act on a big enough scale, in enough time or if we don't act at all.
Our proposal is ambitious, but we are only asking for what is needed.

Conclusion

SWWAN's proposal to prioritise ecological restoration in the WIllunga Basin provides Governments at local, State and Federal levels an opportunity to create a future-ready, sustainable community and an opportunity to demonstrate their environmental and climate credentials to Australia and the rest of the world. Our evidence-based proposal offers a major contribution to ensuring no further extinctions in South Australia and protecting our future food security. Our plan also addresses some of the health and economic problems associated with climate change that our communities will face. The creation of the Willunga Basin Coast Conservation Park will protect and restore the Tjilbruke Dreaming Trail which is of significant cultural importance to the Kaurna Nation and will enhance the quality of life of all current and future residents.

For the future of the Willunga Basin and South Australia, the Sellicks Woodlands and Wetlands Action Network, on the behalf of all South Australians, urges the Government of South Australia to adopt SWWANs proposals to create the Willunga Basin Coast Conservation Park and Rewild the Fleurieu to restore biodiversity as part of the new Greater Adelaide Regional Plan.

Sellicks Woodlands and Wetlands Action Network

Sellicks Beach SA 5174

www.sellickswoodlands.au

Email: sellickswoodlands@gmail.com

SWWAN Coordinator and Author

Matt Farrell

We Have a Rental Housing Crisis

We don't have a housing crisis, we have a rental crisis. There are lots of homes for sale for anyone with the money. There are very few rental homes available no matter how much money a person has.

The crisis in rental housing is due to severe lack of availability with historically low vacancy levels, which has driven massive rent increases. Vacancy rates around 3% are considered healthy with a balance between renters and landlords. Vacancy rates below 2%, as we are seeing across Australia, signify high rental demand. A vacancy Rate above 4% indicates low demand and that there is more stock available than required.[3] Rental vacancy rates across our region are very low. (Table 3)

Table 3 Vacant Dwellings March 2023 [1,2,3,4,5,6]

Vacant Dwellings (March 2023)	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Rented properties	1,509	15,402	152,198
Vacant Rentals	24	258	1,309
Air BnB Listed Dwellings	252	564	2,972
Total Vacant Dwellings (Lng+AirBnB)	276	822	4,281
AIrbNB % (AirBnB/Total Vacant Dwellings)	91.3%	68.6%	69.4%

The effect on supply of the short-term rental and holiday market as it has grown over the last decade is often overlooked in housing discussions. Table 3 compares the number of vacant properties and those listed on Air BnB. It is important to remember that Air BnB is only one short-term rental platform.

Advocates of short-term rental properties often misrepresent the number of properties as only a small percentage of the total rental pool. It is more appropriate when addressing the rental crisis to represent them as a percentage of vacant properties.

Table 3 shows that a significant percentage of vacant dwellings that could be a home, are instead reserved for holidays. By encouraging landlords of short-term rentals to switch to long term rentals, homes could become immediately available and help a family in crisis.

Tables 4 and 5 show the difference that would be made to the Rental Vacancy Rate if 25% or 50% of Air BnB properties were offered as long-term rental homes instead.

Table 4 Change to Vacancy Rate if 25% of AirBnB in a region became a long-term rental.

Switch 25 % Airbnb to Long term	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Vacant Rentals	87	399	2052
Air BnB Listed Dwellings	189	423	2229
Vacancy Rate if 25%Airbnb become long term	5.77%	2.59%	1.35%

Table 5 Change to Vacancy Rate if 50% of AirBnB in a region became a long-term rental

Switch 50 % Airbnb to Long term	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Vacant Rentals	150	540	2795
Air BnB Listed Dwellings	126	282	1486
Vacancy Rate if 50%Airbnb become long term	9.94%	3.51%	1.84%

Short-term rental advocates will argue as to the economic benefits brought by the service they provide. The counter argument to this is to consider an equivalent number of families living in these homes contributing not just economically but becoming part of these communities. The economic benefits would also be felt in a reduction in demand for crisis services and other social support services associated with the rental crisis we are currently experiencing.

Ways to achieve this change

The desire of landlords for greater financial returns has been the main driver of the switch from long-term to short-term rentals over the last decade. To reverse the rental housing crisis, it is important to address the financial incentive directly. Here are a number of ways that this could be done.

Council Rates: (both together)

- Increase council rates of short-term rentals to commercial hotel rates. Rates should be set on the use of the building not its shape.
- Discount rates for landlords offering long-term leases.
    - e.g., 1 year - 10% off, 2 years - 15% off, 3 years – 20% off.

State:

- Set limits on number of days a property can used for short-term rentals.
- Consider a land tax to replace stamp duty to increase the ongoing costs on vacant properties.
- Increase safety compliance on short-term rentals to commercial hotel standards. Safety should be based on use not the shape of the building.

Conclusion

Short-term rental properties significantly reduce the amount of vacant rental stock in an area and rental vacancy rates could be shifted significantly by just a small number of short-term rentals becoming homes.

While incorporating more social and affordable housing into future developments will help in the future, families cannot live in their cars for years waiting. Encouraging landlords to switch to long-term leases as a priority will reduce the number of families in difficulty right now.

References.

1. Inside Air BnB, www.insideairbnb.com , data provided by Liss Ralston, Inside AirBnB, June 26 2023
2. Australian Bureau of Statistics, https://abs.gov.au/census/find-census-data/quickstats/2021/4 , accessed 10/6/23.
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Document created by M. Farrell, SWWAN Coordinator, on behalf of the Sellicks Woodlands and Wetlands Action Network (SWWAN), June 2023 as part of SWWAN's 'Rewild the Fleurieu' campaign.

Contact

Email sellickswoodlands@gmail.com

Website www.sellickswoodlands.au

Sellicks Woodlands and Wetlands Action Network (SWWAN)

Inadequate Canopy Cover Targets
in the
Greater Adelaide Metropolitan Region
(September 2023)

Sellicks Woodlands and Wetlands Action Network seeks urgent action to correct a grave error in the Greater Adelaide Urban Canopy Cover Targets in the 30-Year Greater Adelaide Plan (2017).

This error poses a significant immediate and future threat to the health of South Australians. It will result in a severe lack of adequate canopy coverage to protect South Australians from the health effects of increased urban heat due to climate change. This will not only cause an increase in heat related illnesses and deaths but come at significant social and economic cost. All the while, the community remains unaware that genuine targets for their future safety aren't being set or met.

Contemporary and current literature recommend canopy cover needs to be above 30% in future urban landscapes[1][2][3]. Sydney[4] and Melbourne[5] both set a specific future canopy cover **target** of 40%, by 2036 and 2040 respectively. Adelaide[6] has stated the desired outcome differently: that urban canopy cover "***be increased by 20%"*** by 2045.

The misinterpretation of this target as 20% of a current amount rather than an overall gain has resulted in most councils setting 2045 tree cover and planting targets 50-90% lower than recommended by the current literature. Councils with the least amount of canopy coverage have set the smallest targets. For example, the City of Onkaparinga has interpreted a 20 percent increase in canopy cover to mean a rise from 12.5 % to 15%. Yet the intent of the target was surely to increase canopy cover to 32.5%.

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[1] Urban Canopy Targets and Development Controls, GALLAGHER STUDIO, 2021
[2] The Urban Heat Island in Australian City Planning A. Elgendawy, P. Davies, Macquarie University, Dept. of Earth and Environmental Sciences, 2019.
[3] Where Should All the Trees Go?, Greener Places Better Places 2017.
[4] Greater Cities Commission
[5] City of Melbourne –Urban Forest Strategy
[6] 30 Year Plan for Adelaide (2017 Update) p150

Because of this miscalculation, not only has a vastly inadequate amount of shade been planted over the last four years across the metropolitan area, but developers have been building 25-50% more housing on sites than recommended by urban planners to protect our communities from urban heat. Additionally, as developers have had to retain or provide significantly less open space, this miscalculation has been a significant contributor to the loss of mature trees in our landscape. Further, the miscalculation has benefited developers to such an extent that it appears to be a strategic misinterpretation of the target rather than a simple mathematical or administrative error.

Due to the significant health threat that this poses, we ask that the Planning Minister take immediate steps to clarify the intent of the targets. In so doing, the government recognises that the mistake rests on a wrongly applied formula. It is not simply a difference of opinion.

We ask that these steps be immediately taken:

- the State Government immediately amend the Greater Adelaide Plan Target 5 to include a specific Urban Canopy Cover Target above 30%,
- all councils immediately reset their canopy cover targets in line with this new target,
- the State Government/Planning SA halts all development approvals until the error is corrected,
- all project approvals not yet under construction be reviewed in line with the new targets by Planning SA once the new targets are legislated,
- an investigation be initiated into how such an error occurred.

The Problem

The problem is that there are two possible interpretations of the phrase "increased by 20%" as set out in Target 5 of the 30-Year Greater Adelaide Plan.

This should be understood in comparison to Sydney and Melbourne: both of their Plans state a specific future canopy cover **target** of 40%:

- ***City of Melbourne Target*** – *"Increasing canopy cover from 22 per cent to 40 per cent by 2040."* [7]
- **Greater Sydney Target** – *"A target has been set to increase tree canopy cover to 40 per cent, up from the current 23 per cent."* [8]

[7] City of Melbourne –Urban Forest Strategy
[8] Greater Cities Commission

However, the Greater Adelaide Plan does not specify a specific target figure, but rather sets a **target increase**.

> " *30 Year Plan for Greater Adelaide (2017 Update) Target 5*
>
> *Target 5: Urban green cover is increased by 20% in metropolitan Adelaide by 2045.*
>
> *Therefore, the following is proposed:*
> *• For council areas with less than 30% tree canopy cover currently, cover should be increased by 20% by 2045.*
> *• For council areas with more than 30% tree canopy cover currently, this should be maintained to ensure no net loss by 2045."* [9]

By only defining the target as "a 20% increase in coverage", rather than stating a recommended specific target of 40% as Sydney and Melbourne have, a situation is created where two contradictory mathematical interpretations arise.

One interpretation sets 2045 urban canopy cover targets that are aligned with the intent and context of the 30-Year Greater Adelaide Plan (2017).The other sets vastly inadequate targets that pose a significant threat to the health of South Australians.

Interpretation 1: *An increase in the overall canopy by 20 percentage points.*
SWWAN believe that this was the intent and spirit of the legislation. This is supported by scientific literature on urban heat island effects, current and contemporary urban planning recommendations and the context that Adelaide has one of the lowest canopy coverage percentages in Australia as described earlier.

Table 1. Table of 2045 Urban Canopy Cover targets under Interpretation 1 for an example range of current canopy covers of 5-25%.

Example Current UCC	Increase of 20% overall	2045 target
25%	20%	45%
20%	20%	40%
15%	20%	35%
10%	20%	30%
5%	20%	25%

[9] 30 Year Plan for Adelaide (2017 Update) p150

<u>Interpretation 2:</u> *An increase in canopy cover by 20% of the current amount.*
This interpretation provides a literal interpretation that contradicts the spirit and intent of the legislation. The very low targets resulting from this interpretation are far below the recommendations supported by scientific literature and contemporary urban planning guidelines and are dangerous to community health in the future. It is also illogical to consider that the State Government would propose a guideline that resulted in councils with the ***lowest*** amounts of current canopy cover and the most in need of large increases, planting the ***least*** amount of trees over the next 20 years. This interpretation ignores all context and good sense.

Table 2. Table of 2045 Urban Canopy Cover targets under Interpretation 2 for an example range of current canopy covers of 5-25%.

Example Current UCC	Increase by 20% of current	2045 target
25%	5%	30%
20%	4%	24%
15%	3%	18%
10%	2%	12%
5%	1%	6%

It is obvious that Interpretation 2 is inconsistent with the intent of the legislation to adequately improve Urban Canopy Cover across metropolitan Adelaide and that Interpretation 1 is the only reasonable method for setting the 2045 Canopy Cover targets for Adelaide Councils.

It is this second interpretation, in which the target is calculated as only 20% of the current amount, that has been used to set urban cover targets, allocate planting programs and guide development approvals by the majority of councils in Greater Adelaide for the last 6 years. A partial list is presented in Table 3 (next page).

The targets set by the majority of Greater Adelaide Councils are significantly below the recommended standards, both current and contemporary for 2017. This means that for the last 6 years, most councils have been planting only a tiny amount of the required amount of future canopy cover, while builders have been chopping down trees and filling blocks with eave to eave housing. This has resulted in significant budgetary savings to councils and boosted profits for developers, but at what cost to society?

Council	Current Urban Canopy Cover (Trees >3m)	Target Increase in Urban Canopy Cover	Target (% UCC 2045)
Adelaide Hills Council	n/a	n/a	n/a
City of Adelaide	n/a	n/a	n/a
City of Burnside	31.0%	n/a	n/a
City of Campbelltown	18.4%	n/a	n/a
City of Charles Sturt	14.0%	3% (20% of current)	25% (higher target set than 17.4%)
City of Onkaparinga	12.5%	2.5% (20% of current)	15% (Not stated on Website)
Town of Gawler	15.00%	15% (100% of current)	30% (Double current)
City of Holdfast Bay	15.3%	1.5% (10% of current)	16.8% coverage by 2030
City of Marion	15.00%	19% (More than double)	34%
City of Mitcham	42.00%	0	42% no net loss of canopy
City of NPSP	24.0%	4.8% (20% of current)	29%
City of Playford	15.0%	5% (33% of current)	20%
City of PAE	12.0%	3.5% (30% increase of current)	16% (not given on website)
City of Prospect	20.4%	4.1% (20% of current)	24.50%
City of Salisbury	20.4%	4.1% (20% of current)	24% (not stated on website)
City of Tea Tree Gully	28.00%	na	na
City of Unley	26.0%	5.2% (20% increase of current)	31%
Town of Walkerville	25.0%	5% (20% increase on current)	30% (not stated on website)
City of West Torrens	12.6%	2.5% (20% increase on current)	15%

Table 3. Greater Adelaide Council Urban Canopy Cover Targets and Increase.

Based on the City of Onkaparinga's targets and 2023/4 planting budget of approximately $1million, SWWAN estimates that the cost for all councils to adopt an appropriate tree planting program will cost Onkaparinga an extra $7million annually, and the state an extra $100m-$150m. Over the coming 20 year length of the program, this represents a cost of $1.5bn-$2bn. In our opinion, the health, social and economic costs of not rectifying the problem will be much, much higher.

Urban Canopy Cover

Increasing urban canopy cover is a key method to reduce the health and economic impacts of climate change. Increased canopy cover in urban areas reduces urban heat effects by creating shade.

Over the coming decades the climate will become hotter and drier with an increase in extreme events such as heatwaves. Heatwaves and extreme heat already kill more people each year in Australia than any other natural hazard. Research shows there are significant public benefits associated with greater urban canopy coverage, with improved physical and mental health for residents and a lower economic health burden for the state. A 2022 University of Adelaide study of heat related mortality (HRM) showed that there is great potential to reduce HRM in Adelaide by increasing tree coverage.[10]

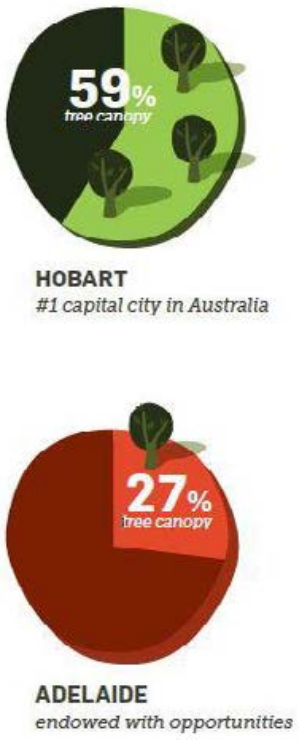
Urban heat causes significant economic impacts. Increased sick days, loss of productivity, equipment and infrastructure failure, all come at an economic and social cost as shown in Figure 1, from a study of Western Sydney Councils. Increasing canopy cover in our urban and built environments is essential to adapting to climate change and protecting our communities.

Figure 1.Diagram of key urban heat impacts in Western Sydney[11]

[10] The Potential for Urban Canopy Cover to Reduce Heat-Related Mortality in Adelaide. Carlos et.al. 2022
[11] Western Sydney Region of Councils: Turn Down the Heat. 2018

Canopy Cover- Context and Industry Recomendations

A major resource in the setting of Adelaide's Urban Canopy Cover Targets was "Where Are All The Trees?" (WAATT?), produced by Greener Spaces, Better Places in 2014. Urban Canopy Cover in Greater Adelaide was reported as 27%, much lower than most other Australian capital cities and the national average of 39%.[12] The majority of Adelaide councils fell into the low range of 10-20% (Fig. 2).[13]



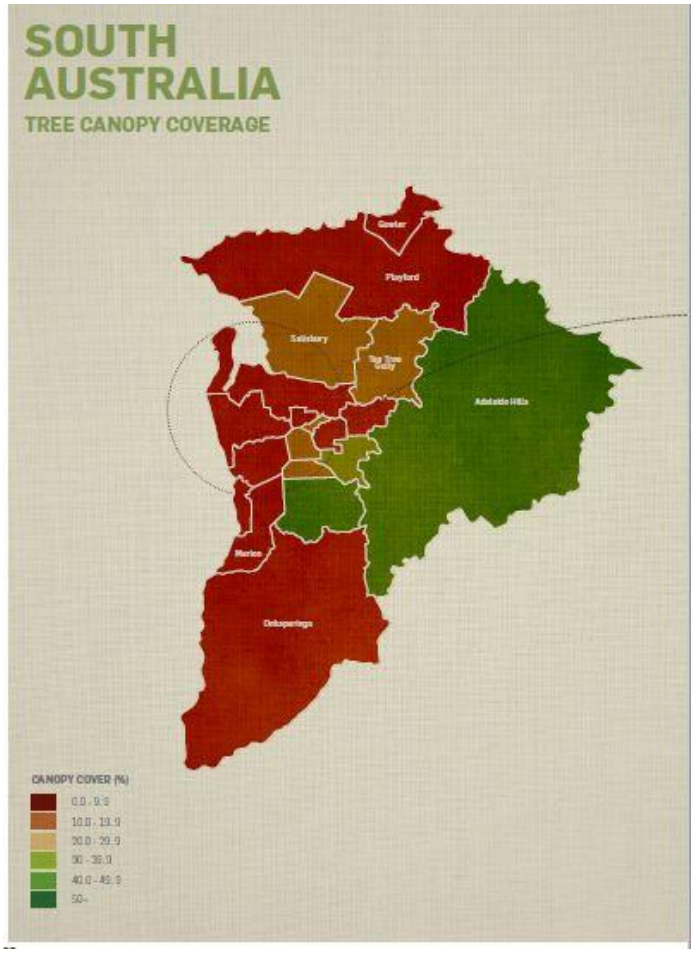


Figure 2. Comparison of UCC Hobart/Adelaide

Figure 2. Adelaide LGA's Canopy Cover

"Hobart is the highest ranking capital city in terms of the proportion of tree canopy to other kinds of ground cover. Hobart boasts 59% tree canopy cover. By comparison, Adelaide has the lowest proportion of tree canopy among Australia's capitals with 27%." WAATT?, 2014.[14]

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[12] Where are all the Trees? Greener Spaces Better Space P9
[13] Where are all the Trees? Greener Spaces Better Space P9
[14] Where are All the Trees? Greener Spaces Better Spaces. p18

In 2019 Greener Spaces Better Places released the follow up report, “Where Should all the Trees go?”. The method for calculating canopy cover was changed and Adelaide’s average cover in 2013 was adjusted to 21.37%. Shockingly though, by 2017 this had declined to 19.45%, a loss of nearly 10% on the previous figure (Fig. 3) [15]

Figure 4. SA Snapshot. Where Should All the Trees Go? Greener Places Better Places 2019. p52

“Where should all the trees go?” also introduced a vulnerability index that measures a community’s risk to urban heat that takes into account a range of factors and effects. South Australia is one of the most vulnerable states on the National vulnerability Index(Fig. 4).

Figure 5. National Vulnerability Index. Where Should All the Trees Go? 2019. p7

[15] Where Should All the Trees Go?, Greener Places Better Places 2017.

Scientific literature and the urban planning industry all agree that to protect the health of the population and infrastructure in the future, urban canopy cover needs to be at least 30%[16], and preferably as high as possible, as every increase in cover sees a reduction in ambient temperature. The Urban Canopy Targets and Development Controls report used by the NSW Government to set its target of 40% outlines generic targets in a typical Australian suburb for each different urban zoning(Fig. 5). [17]

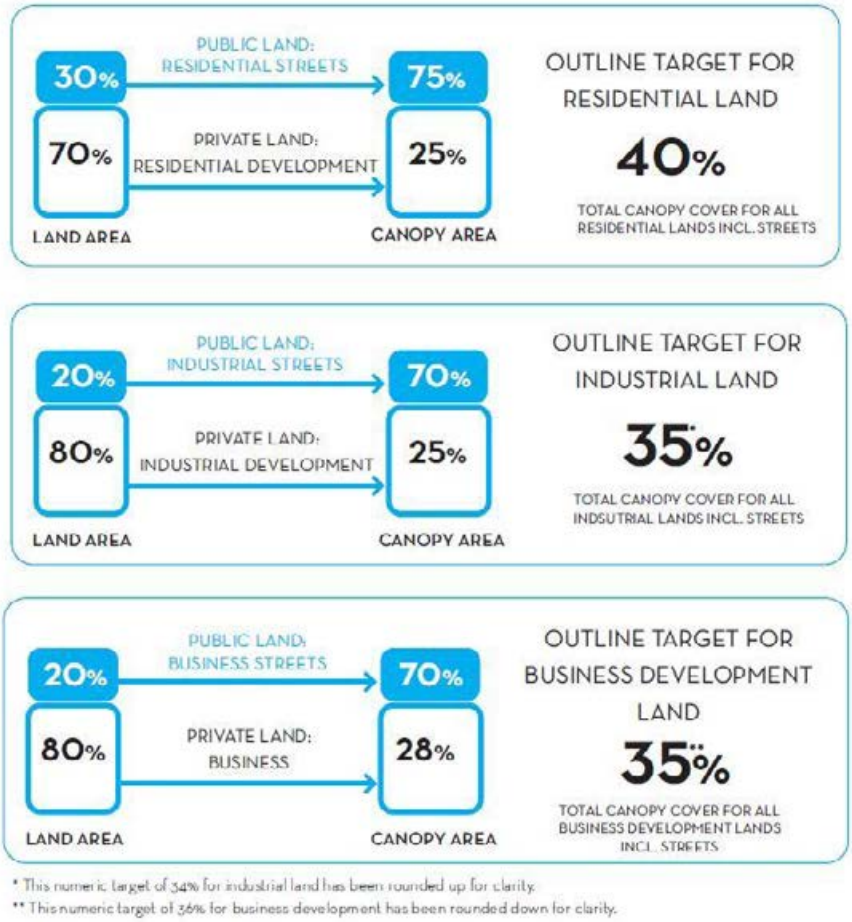

Figure 6. Outline canopy cover targets for residential, industrial and business development. GallagherStudio. 2021.

It can be seen from these examples that Adelaide has the lowest canopy cover relative to the rest of the nation. This, along with other factors, makes us very vulnerable to the effects of increasing urban heat. Contemporary and current literature recommend targets of at least 30% urban canopy cover to protect the health of residents and workers in urban environments in the future. Climate forward states have set targets that surpass 30%. South Australia should act immediately to do so too.

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[16] The Urban Heat Island in Australian City Planning
[17] Urban Canopy Targets and Development Controls, GALLAGHER STUDIO, 2021

SWWAN's Suggested Amendment

SWWAN proposes the following suggestion to amend the wording of the Greater Adelaide Plan and remove the ambiguity in the current wording of Target 5.

Suggested new wording for 30 Year Plan Target 5

Target 5:

Urban green cover is to be at least 30% coverage within each metropolitan Adelaide council by 2045. to ensure that the overall average for metropolitan Adelaide is above the current National average of 39% by 2045.

- *Therefore, the following is proposed:*
  • For council areas with less than 30% tree canopy cover currently, total cover should be increased by a total of 20% to above 30% total coverage by 2045.
  • For council areas with more than 30% tree canopy cover currently, total cover should be increased by a total of 15% to above the current National Average of 39% by 2045
  • For councils with greater than 39% canopy cover should increase by 20% of the current amount.

Under our amendment, the City of Onkaparinga would set a target of 32.5%, just above the state average and the 30% threshold but still below the national average. The City of Unley would have set a target of 46% placing it just above the national average. (Table 6)

Table 4. Comparison of canopy coverage target setting methods for 3 Adelaide councils.

	City of Onkaparinga	City of Unley	City of Mitcham
Current Canopy Coverage	12.5%	26%	42%
Current 2045 Target (increase)	15% (2.5%)	31% (5%)	42% (0%)
2045 SWWAN Targets (increase)	32.5% (20%)	46% (20%)	50% (8%)

Conclusion

We understand the scale and cost of what we are asking. The scale is simply what is needed; the cost much less than the health, economic and social costs of following plans that are inadequate to address the urban heat effects of climate change.

DTI:PlanSA Submissions

From: Alice Clark | Shelter SA [redacted]
Sent: Thursday, 2 November 2023 12:02 PM
To: DTI:PlanSA Submissions
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Shelter SA Greater Adelaide Regional Plan Submission.pdf

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

Please find attached the Shelter SA Submission to the GARP Discussion Paper.

Dr Alice Clark
Executive Director
Shelter SA
The South Australian Peak Body for Housing

[redacted]
PO Box 6207 Halifax Street Adelaide SA 5000
We acknowledge and respect the Kaurna people as the traditional custodians of the ancestral lands we live and work on and their deep feelings of attachment and relationship to country.

Greater Adelaide Regional Plan Submission

Introduction

Shelter SA is the peak body for housing in South Australia. Established in 1977 as an incorporated association, our vision is for all South Australians to have safe, secure, affordable and appropriate places to call home.

Shelter SA members include many of the major charities and not for profits in South Australia that provide human services and social housing with a smaller number of associate corporate members. Shelter SA is an independent, not for profit and registered charity, due to our connection with our members who work directly with citizens towards the benevolent relief of poverty.

Shelter SA constituents are people living on low incomes who are experiencing the greatest housing need and are at risk of, or experiencing homelessness. A low income household is defined as being in the lowest household income quintile of $30,000 per annum or below.

During the last two years, Shelter SA has written multiple submissions to government consultations and inquiries, that have relevance to this submission to the Greater Adelaide Regional Plan and these are referenced at the end of this document.

We also refer the Commission to the recommendations report from the Taskforce on Older Women and Housing Security (the Taskforce), which is relevant to this review, and is awaiting publication by the South Australian Government.

Background

The right to adequate shelter is a basic human right and housing is a social determinant of health. When South Australians do not have a home, they are denied their human rights and the opportunity to develop to their full potential.

A lack of access to housing results in homelessness for many people. Last year there were almost 20,000 South Australians who received homelessness services and many more who were turned away or did not have their short, medium or long term housing needs met. An alarming 40% of clients are children and young people. It is no coincidence that the number of people receiving services matches two other numbers - over the last twenty years, South Australia has sold approximately 20,000 public housing properties to the market and the social housing waiting list is almost 20,000 applicants (not individuals). These numbers give some indication of the size of the issue.

In addition to experiences of homelessness, thousands of South Australians live with housing stress, that is when low income households are paying more than 30% of their income on housing. Charities are overwhelmed with people seeking assistance, who cannot afford to feed their families.

The organisations are forced to undertake fundraising activities as government funding does not adequately reflect community need. This situation is unacceptable and must be rectified.

The Commonwealth Government funds South Australian specialist homelessness services at an amount of $71 million a year, yet the scale of housing outcomes that are needed to relieve homelessness cannot be attained. For the proportion of people experiencing homelessness who have high and complex support needs, private rental is rarely an option as they require significant support and supported accommodation to thrive.

Private rental has been unaffordable for people living on low incomes for many years and now South Australia has one of the lowest vacancy rates in the country, the available, accessible housing outcomes have narrowed significantly. Nor does South Australia have enough crisis accommodation to meet the daily needs of people who have no shelter.

The Terraces, managed by Unity Housing Company, provides an example of a gold standard of supported accommodation. The Terraces is a purpose built rooming house, that provides self contained, secure, supported and affordable accommodation. Each region of Adelaide and rural region should have similar accommodation.

Inclusionary Zoning

An increase in the supply of social housing is critical to achieving the principles and aims of the Greater Regional Adelaide Plan. One aspect of achieving increased supply is to address the use of public land and quarantine it for social housing. To this end, Shelter SA has long advocated for a review of the Inclusionary Zoning Policy to adopt a mandatory scheme that produces social housing instead of affordable housing at a market discount.

When the affordable housing mandate was introduced, it was intended to include 10% affordable housing and 5% for high needs housing, however, to our knowledge high needs housing has never been an outcome and that aspect of the original policy intention has disappeared from the policy. When the policy commenced it was more effective as house prices were relatively low compared with today's prices. The policy is no longer relevant to low income households and should not be marketed as such.

When land is rezoned and immediate increases in value result, especially when there are public land sales, considering social housing as infrastructure creates an imperative to use the value uplift to provide a social good. Like the way we insist on open spaces, there should be an imperative to contribute to social equality and diverse housing that is placed above maximising profit making. There is little point in producing discount to market house sales for the middle classes and the discount should be directed to subsidising social housing. The Discussion Paper refers to the "missing middle" and unfortunately does not have a focus on the households living with the greatest housing need.

If the South Australian inclusionary zoning policy was changed to mandate a proportion of social housing instead of affordable housing, the recent largest land releases in South Australia's history would not represent a missed opportunity to increase the supply of social housing, without a cost to government. Shelter SA supports the introduction of a Mandatory Inclusionary Zoning framework as produced by the Constellation Project[1].

[1] https://theconstellationproject.com.au/wp-content/uploads/2020/07/2020-05-15-MIZ_Brochure_20200318_v6.pdf

Housing as Essential Social Infrastructure

While we continue to place social housing in a welfare context, we will never reduce or end homelessness. Your postcode should not determine your life outcomes or doom you to social inequality. If the planning system seeks true social equality, the provision of low cost rental housing, market rental housing and social housing must be considered as essential social infrastructure – a concept that is omitted in the discussion paper. Transport, employment and health care are important, however without including housing as essential social infrastructure, the importance of having a secure foundation for people to live their lives is overlooked.

Social housing rentals are the only current option that is affordable for low income households. State Government commitments to increase the supply of social housing are welcome however do not meet current or future projected need, without the development of additional and alternative housing products and sources of investment.

Housing Diversity

While we continue to build expensive, large homes on expensive, large land lots and experience delays in the supply of materials and labour shortages, a failure to innovate in housing supply and disrupt the current market will not result in an improved housing future for South Australians.

Shelter SA has researched and consulted at length the production of modular or pre-fabricated homes. There are multiple manufacturers across the State who could have the capacity to mass produce high quality dwellings at scale if there was a pipeline of work. Many are preoccupied with supplying worker camp-style accommodation and school buildings but could be encouraged to focus on residential supply if the right planning structures were in place. When produced with an economy of scale, smaller dwellings (two bedroom) with a smaller footprint and land use, can achieve savings in costs and reduce the time needed to complete builds. With the growth of single person households, two bedroom, smaller homes would be more suitable for singles and were endorsed as a suitable housing option by the Taskforce.

We were pleased to see an expression of interest by the South Australian Housing Authority inviting industry to provide their ideas about supplying modular dwellings as public housing at eleven locations across the State however, the outcomes of that process remain unreleased to applicants and the public, as far as we are aware. If spending commitments for public housing were to harness modular builds, potentially the number of houses built could be increased significantly.

South Australia has the highest cost of utilities in the country. Modular homes are highly energy efficient and therefore would also serve to alleviate cost of living pressures for low income households, with smaller footprints, and adequate heating, cooling and insulation.

Modern Villages

Thousands of South Australians are locked out of the home ownership market. If a new housing product was created that was affordable for low income households, it would ease the housing crisis, reduce the social housing waiting list and the need for social housing while providing the affordability, availability and security that people want and need.

Through harnessing existing legal structures such as retirement villages and residential parks, and producing lend lease communities, it is possible to build modern villages with alternative housing products as described above, if they can progress smoothly through the planning system.

The price point that is affordable for low income households is $200,000 or lower, which would enable the household both to achieve a mortgage and affordable repayments. If homes could be supplied for $100,000 and sold for $200,000, with the land leased long term, there is a financially sustainable model for private and public finance and land holders. The land holder can benefit by retaining the ownership of their land, avoiding the cost of subdivision, capturing capital growth and achieving cash flow with a choice available to own and operate the development, sell it or outsource its management. Assisting Shelter SA in developing this sustainable financial model were workshop participants at an event held with the Town of Gawler.

There are existing residential parks throughout the State with differing levels of amenity. The Shelter SA modern village concept is guided by a set of principles to ensure that villages are places that people aspire to live in, and the homes are attractive and of high quality and amenity. The concept does not describe a social housing option to group together people with high and complex needs but aims to achieve a social mix of incomes and family types to attain a diverse community, with communal spaces that can be enjoyed by residents.

Smaller, modular dwellings situated on the same site are also suitable for crisis and short term accommodation for families who are currently offered motel accommodation which is not suitable for children, nor financially sustainable for government.

Allowing smaller minimum land lots also has the potential to improve affordability. Modern villages are one of the recommendations from the Taskforce.

Aboriginal People

Homelessness, housing stress and overcrowding are experienced disproportionately by Aboriginal people in South Australia. While a commitment to the Uluru Statement from the Heart is mentioned in the Discussion Paper, to achieve social equality for Aboriginal people, social housing, housing diversity and alternative home ownership products have a critical role to play and only provide a greater imperative to adopt innovation and investment in these areas.

Not for Profit Land Holdings

South Australian not for profit and charitable organisations own significant land holdings, some of which are underutilised or contain buildings that are not fit for purpose. Not all these organisations have access to strategic land asset management advice, and Shelter SA has previously developed a proposal to develop a land asset database, to make such advice accessible to them, but does not have the resources to implement the concept.

Build to Rent

The current shortage of rental properties is causing an increase in homelessness in South Australia and people have no option but to live in caravan parks, tents or couch-surf, with families being forced to sleep in their cars. Rental supply must be increased as quickly as possible and Shelter SA is supportive of build to rent projects, especially when they are produced on public land, to prevent land sales to the market, with the proviso that low cost rentals are included, not solely luxury housing. State Government initiatives to encourage build to rent projects are welcome.

Granny Flats

Changes to the rules around renting granny flats to non relatives are welcome however it is not known if local governments are consistently up to speed on the changes and how easily supply can

be achieved. A pathway for granny flats to be added to large public housing and community housing lots could assist in easing the housing crisis and the demand for social housing.

Conclusion

South Australians must accept that if we are to achieve social equality and the housing that people need and can afford, higher density and alternative forms of housing are an essential part of our future in all our suburbs and regions. The planning system has an important role to play in facilitating both aims and we look forward to the outcomes of the review.

Please contact me if you require further information.

Shelter SA Submission References

Modern Village Concept PowerPoint

Modern Village Concept Written Outline

Submission to Inquiry into Housing Availability

Election Platform

Moving On Report

Residential Tenancies Act Review Submission

Worsening Rental Crisis Submission

National Housing and Homelessness Plan Submissions

By National Shelter

By Shelter SA

Contact

Dr Alice Clark
Executive Director
Shelter SA
[redacted]

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:02:48 PM
Attachments: image001.jpg
image002.png
Submission SCCA - Greater Adelaide Regional Plan (Nov 2023).pdf

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

Dear PlanSA,

Please find **attached** a submission from the Shopping Centre Council of Australia on the Greater Adelaide Regional Plan Discussion Paper.

Could you please confirm receipt of our submission?

Please do not hesitate to contact us should you have any questions or wish to discuss further.

Kind regards
Nick

Nicholas Karam
Senior Policy Advisor

Suite 218, Level 2, 165-167 Phillip Street
Sydney NSW 2000
M [redacted] **E** [redacted]
W www.scca.org.au @SCCA_Advocacy

SHOPPING CENTRE
COUNCIL OF AUSTRALIA

6 November 2023

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

via email: plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan

The Shopping Centre Council of Australia (SCCA) appreciates the opportunity to make this submission to the State Planning Commission (the Commission) in relation to the Greater Adelaide Regional Plan (GARP) Discussion Paper (Discussion Paper).

The SCCA represents major shopping centre owners and operators in South Australia and across Australia. The SCCA provides this high-level submission noting that consultation on the Discussion Paper is high-level at this stage.

KEY POINTS TO GUIDE THE DEVELOPMENT OF THE GARP

- The SCCA advocates for the continued elevation of shopping centres in meeting the long-term planning goals and objectives of the South Australian Government and the Commission, including greater density in and around shopping centres.
- The retail sector is critically important in providing jobs and essential services for future growth. We welcome the fact that the Discussion Paper recognises this. The GARP should encourage investment, remove barriers to growth and support greater density.
- Activity centres must continue to play an important role in planning and future development, with the primacy of the retail core retained in activity centres.
- The GARP should provide flexibility for land uses around shopping centres with greater density in activity centres, including mixed accommodation, commercial, and education uses. Additional density around shopping centres can be done in a measured and balanced way so as not to limit the feasibility and prime purpose of shopping centres.
- The GARP must encourage the delivery of enhanced public transport, public infrastructure, and civic works around each centre, and support adequate parking provision rates that allow shopping centre owners and operators to manage their car parks effectively.

KEY REASONS

The SCCA is and remains a strong proponent of centres-based planning. The concentration of activity in centres, including retail uses and development, supports many 'public good' outcomes sought by planning systems.

These include choice for consumers, transport/infrastructure efficiency and productivity, environmental and heritage protection, sustainability, resource protection, employment concentration, and the minimisation of land-use conflict. All of these have been identified in the Discussion Paper as critical in the development and finalisation of the GARP.

The SCCA is keen to ensure that South Australia's planning system continues to reinforce a positive, centres-based approach to investment and to highlight the importance of activity centres, and the importance of a well-defined and supported centres hierarchy, as being critical to guide development, including investment in retail floorspace, across South Australia.

As has previously been recognised by the Commission:

> "*shopping centres and main streets are the heart of vibrant and connected communities and support South Australia's growth and development. For many years, planning policy has supported a centres hierarchy approach, from regional and district level shopping and services through to neighbourhood and local centres providing for smaller scale conveniences*".

This must be a key aspect of the GARP as it is developed and finalised and must be a key consideration for the Commission as it develops plans for future growth and development, as outlined in the Discussion Paper.

South Australia's emphasis on activity centres, higher density mixed-use precincts and developments along transit corridors, as articulated primarily through *The 30-Year Plan for Greater Adelaide*, is considered a key strength of the South Australian planning framework, and has provided a fairly stable climate for investment. The GARP (which is set to replace *The 30-Year Plan for Greater Adelaide*) must continue to emphasise and recognise the importance of activity centres, higher density mixed-use precincts and developments along transit routes.

THE ROLE OF SHOPPING CENTRES

We welcome the fact that the Discussion Paper recognises the importance of the shopping centre sector and retail trade to the South Australian economy.

The figure on page 23 of the Discussion Paper highlights that retail trade is the second largest industry in the Greater Adelaide Capital City region. Further, figure 13 on page 149 demonstrates that retail trade will continue to grow as an industry of employment and will remain in the top 4 industries of employment across the Greater Adelaide employment lands.

Shopping centres have played a critical role and should play an elevated role in meeting the long-term planning goals and objectives of the South Australian Government, and in addressing the goals, themes, and principles set out by the Commission in the Discussion Paper:

- ***The 12 major trends***: as outlined on pages 34-35 of the Discussion Paper, the Commission has identified 12 major trends and drivers that will shape the future of Greater Adelaide. The shopping centre sector has and will continue to play a vital role in meeting/addressing those trends and drivers of change, especially:
  - Housing availability and affordability: by facilitating mixed use developments.
  - Liveability: by developing shopping centres that deliver products, services, and experiences that consumers want and need close to where they live and close to transport hubs.
  - Digitisation: by changing and growing to satisfy consumer preferences and reflect developments in technology that improve the retail experience.
  - Workforce, skills, and migration: by investing in shopping centres and tenants, and creating job opportunities.

- ***The four outcomes***: as outlined on page 36 of the Discussion Paper, the Commission has developed four outcomes for Greater Adelaide. The shopping centre sector will be critical to achieving every single one of these outcomes:
  - A greener, wilder and climate resilient environment: our members are voluntarily obtaining National Australian Built Environment Rating Scheme (NABERS) ratings and improving their sustainability performance overtime. Our sector continues to heavily invest in and encourages tenants to utilise sustainable and climate friendly practices.
  - A more equitable and socially cohesive place: shopping centres are spaces for communities to meet, gather, and partake in experiences that are beneficial for community cohesion. Our members continue to invest and develop strategies to enhance customer connection and create more positive experiences so that people feel they can visit more often and for longer.

- A strong economy built on a smarter, cleaner, regenerative future: retail is not static and spending trends, populations, and catchment demographics change over time. This means that shopping centres need to be dynamic to make sure that consumer trends are satisfied and that shopping centres do not stagnate and decline. As outlined earlier and recognised in the Discussion Paper, the retail sector is critical to economic productivity and job creation and will continue to grow as an industry of employment.
- A greater choice of housing in the right places: as the Discussion Paper recognises throughout, new housing should be developed close to amenities and jobs. Shopping centres are essential to the delivery of both amenities and jobs (and more).

- ***Living Locally***: the four outcomes set out above will be part of the 'Living Locally' concept that the Commission is exploring as set out on pages 84-91 on the Discussion Paper. We welcome the fact that shopping centres are recognised as a critical part of 'Living Locally.' If 'Living Locally' is explored further and ultimately pursued, the Commission must recognise the importance of activity centres in fulfilling the 'Living Locally' vision and should retain the primacy of the retail/shopping centre core in these activity centres. Future developments in proposed areas of investigation, growth corridors, and employment growth areas should pursue a centres-based planning approach.

- ***Quotes***: as a final point, the Discussion Paper makes a number of salient points that we wish to stress and reinforce:
  - On page 59: *"Every person, no matter where they live, should have access to transport, employment, healthcare, shops and services and high-quality green space."*
  - On Page 87: *"Research across Australia shows people prefer neighbourhoods with good access to high quality local transport and within easy reach of family, work, shops and amenities."*

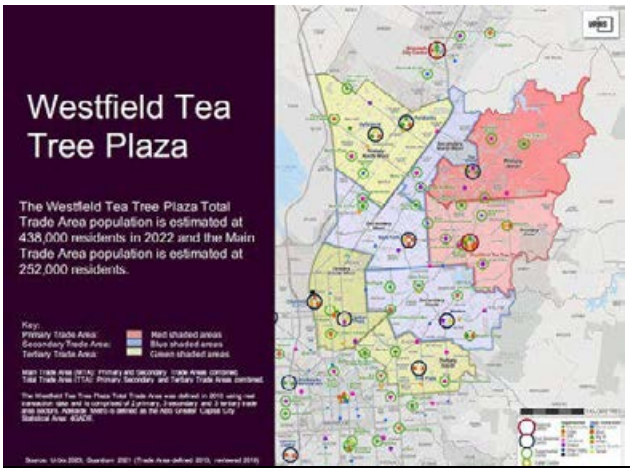
As it is developed, the GARP should similarly recognise the importance of our sector in meeting the long-term planning goals and objectives of the South Australian Government and the Commission.

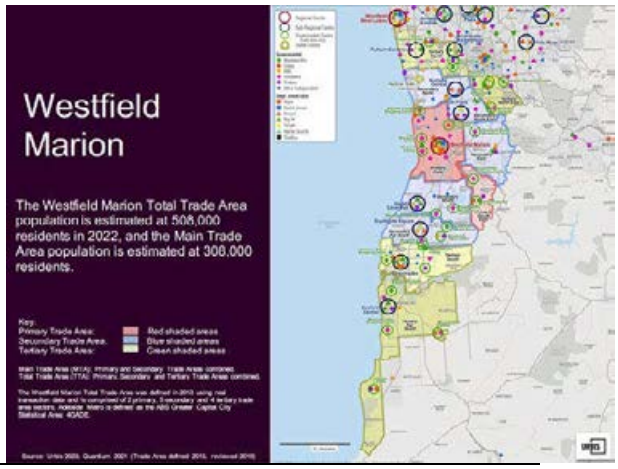
ACTIVITY CENTRES

Activity centres are focussed around large retail centres that service a broad population and include public transport interchanges or high frequency public transport connections. By way of example, Westfield Marion and Westfield Tea Tree Plaza.

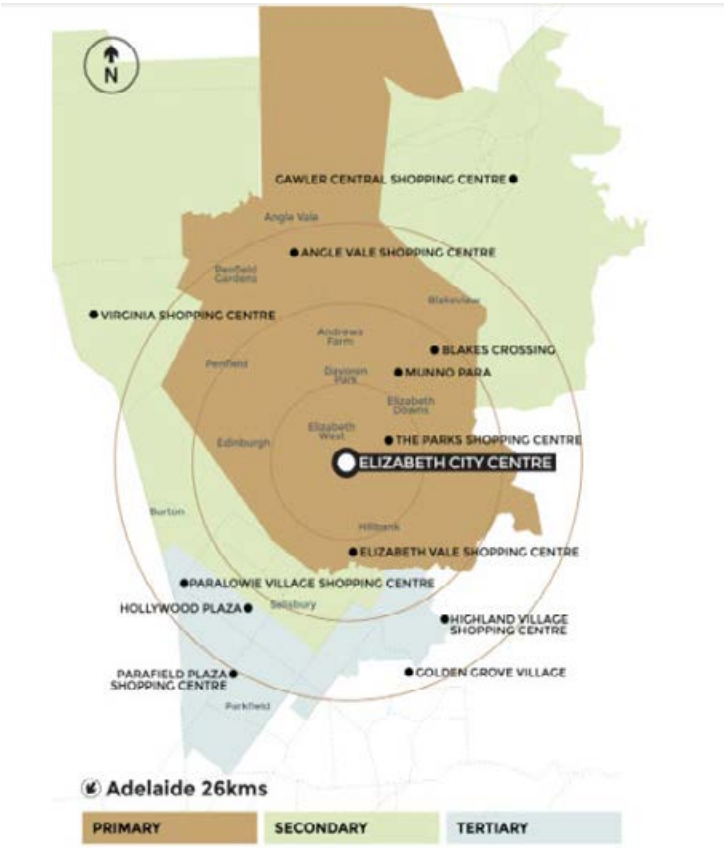
Due to their scale and population catchment, these shopping centres generally provide a full range of services like shopping, entertainment, health, community, and recreation. This provides an opportunity to further develop higher-density housing that will capitalise on the proximity to these services and support their economic viability.

This is highlighted in the trade maps for Westfield Marion and Westfield Tea Tree Plaza. Together, these two centres service close to an estimated 1 million residents.





Vicinity Centres, another member of the SCCA also has a strong presence in South Australia. One of their largest centres in South Australia, Elizabeth City Centre is a regional shopping centre located around 26km north-east of the Adelaide CBD that services close to 250,000 people in its total trade area.



Activity centres have a range of agreed benefits. They become hubs of the community, maximise Government's own investment in infrastructure and concentrate employment. Investment in activity centres is also self-fulfilling. Concentrating employment, both pre-and post-construction, in an activity centre has flow on benefits to the surrounding and new business (e.g. employees purchasing meals, doing their grocery shopping etc.).

The SCCA supports the approach of most governments to concentrate retail and commercial uses in designated activity centres, and the avoidance of ad hoc development and investment.

The GARP must not weaken centres-based land use policy as this would undermine the opportunity for the retail industry to respond to challenges from online retailing and the shared benefits of agglomeration. Centres based policy helps to increase the range of goods and services afforded within a centre and accordingly the attractiveness of centres to provide a single point of shopping and services, reducing the need to travel and add to the carbon footprint.

As outlined in the *Revitalising Retail – Policies in the Planning and Design Code:*

> *"activity centres have been one the pillars of South Australia's growth and development"* and have *"contributed to the…equitable and convenient access to shopping, administrative, cultural, entertainment and other facilities that enable a number of activities in a single trip."*

All of this links back to the outcomes and concepts identified in the Discussion Paper as being critical to the success of and shaping of the Greater Adelaide Region as it grows and develops. Activity centres must continue to play an important role in planning and future development, with the primacy of the retail core retained in activity centres.

BROADER RELATED POINTS

The GARP should continue to highlight the importance of a well-defined and supported centres-based hierarchy in facilitating future planning and development.

A well-defined centres-based hierarchy will not only help to meet the themes and goals set out by the Commission in the Discussion Paper but will continue to encourage retail investment and development across South Australia.

We have noted and highlighted the importance of activity centres above but note that a well-defined centres-based hierarchy encourages good development in neighbourhood and local centres.

The GARP should not promote an increase in out of centre retailing.

Doing so would result in poor development outcomes that undermine the retail hierarchy and disperse trips and activity outside of activity centres where transport and supporting services and goods are provided.

The assets of our members play a critical role in supporting job creation, economic productivity, and delivering essential services and amenities close to homes in neighbourhood and local centres. For instance, Fairview Green Shopping Centre in Fairview Park which is a neighbourhood shopping centre owned by Region Group. This neighbourhood shopping centre services a population of over 270,000 within a 10km radius.

The GARP should equally recognise the role of shopping centres in neighbourhood and local centres/communities.

The GARP should facilitate and encourage retail investment and remove barriers to development in the Commission's stated preferred locations of future development. This would assist the delivery of Government's other priorities, such as infrastructure efficiency, housing delivery, and facilitating vibrant mixed-use communities.

We support the need to ensure that policy is current, meeting emerging issues, and setting a clear pathway to encourage retail investment in the right locations across South Australia.

The Commission and the GARP must continue to identify clear pathways to encourage retail investment in the right locations and to see the continued growth of vibrant and accessible mixed-use precincts across South Australia.

Reduction in red tape and the length of time it takes for planning approvals will also help deliver the Commission's objectives set out in the Discussion Paper. A reduction of red tape could:

- Provide flexibility for land uses around shopping centres with greater density in activity centres, including mixed accommodation, commercial, and education uses.
- Promote above ground apartments in activity centres, where residents benefit from convenient access to shops, services, and transport.
- Enable shopping centres to expand by allowing development opposite/adjoining existing centres and allowing development in convenient new locations.
- Remove barriers to innovation and efficiency.

The GARP should provide guidance that it is a collective responsibility to achieve balanced transport outcomes across activity centres, and that the burden should not fall unfairly on any particular landowners. It is not the responsibility of centre owners to fund regional road or public transport improvements. Some consideration of collective benefit and shared responsibility should be a central theme.

As a final point, the GARP should support and recognise the need for adequate parking provision rates or other mechanisms to support the effective management of parking at shopping centres.

Over time, government policies have often meant that the provision of car spaces as a proportion of floor space has declined, making it more difficult to manage shopping centre car parks in a productive and effective manner.

The core purpose of shopping centre car parks is to provide parking for customers, and ensure they are managed productively for them (e.g. each space is turned over a number of times each day). Customers are the life-blood of shopping centres, especially for small businesses, as they predominantly spend money within centres with the tenants who pay rent to be located in the centre.

As such, the GARP should allow for adequate car parking provision rates or other mechanisms at shopping centres to allow shopping centre owners and operators to manage their car parks effectively.

NEXT STEPS

We thank the Department in advance for its consideration of our sectors perspective. We would welcome an opportunity to discuss these comments further, if required, and will look to opportunities to engage further and provide detailed feedback on the Commission's draft GARP.

CONTACTS

James Newton, Manager – Policy and Regulatory Affairs, SCCA, [redacted],
[redacted]

Nicholas Karam, Senior Policy Advisor, SCCA, [redacted] [redacted]

DTI:PlanSA Submissions

From: Penny Worland [redacted]
Sent: Monday, 6 November 2023 12:53 PM
To: DTI:PlanSA Submissions
Subject: Submission - GARP Discussion Paper
Attachments: GARP Discussion Paper Submission. Social Planners Network of SA. Nov 2023.pdf

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Please find attached a submission on the Greater Adelaide Plan Discussion Paper.

5 November 2023

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

Via: plansasubmissions@sa.gov.au

Submission to the State Planning Commission regarding the Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to make a written submission regarding the Greater Adelaide Regional Plan Discussion Paper.

This submission is from the Social Planners Network of South Australia (SPN).

The SPN is a group of over 100 professionals from a wide range of fields with an interest in high quality social outcomes for communities across the state. In the main, SPN members are urban planners, social planners, and community services staff working in local government. The network also includes representatives from state government agencies and private consultancies with expertise in these disciplines.

The views expressed in this submission are those of the SPN members who contributed to it, reflecting their specialist expertise, and are not necessarily reflective of the views of the organisations our members are employed by.

Representatives of the SPN will be available to discuss any aspects of this submission should you wish to do so.

Introduction

South Australia requires a strategic and consistent approach for addressing the growing social needs of our state.

Not unlike our international counterparts, South Australian communities are facing some of the greatest challenges of our time including climate change, economic disruption, the local effects of global pandemics, housing crisis, ageing populations, and soaring numbers of people who report feeling disconnected and lonely.

Whilst it is not the only lever, land use planning has an important role to play in addressing these and other social needs of communities in Greater Adelaide (and beyond).

There are various ways that land use planning and urban development impact both positively and negatively on people and their lifestyles, so the Greater Adelaide Regional Plan (GARP) represents an important opportunity.

Our comments in this submission are informed by many years of experience working at the interface of social policy, urban and regional planning, urban design and local governance, and are aimed to enhance the positive social outcomes enabled by the GARP.

In making our submission we recognise the integral link between the GARP and the various mechanisms within the planning system guiding its effective delivery and achievement of its aims, critically including the Planning and Design Code and the State Planning Policies.

What do you think of the four outcomes guiding how Greater Adelaide should grow?

Are there any other outcomes the Commission should consider?

Understanding equity and the persistence of place-based disadvantage

We support the focus on achieving *a more equitable place* as a key outcome for Greater Adelaide.

There is a growing body of evidence highlighting that social and economic disadvantage is not evenly distributed, rather it is concentrated in particular places. When the outer fringes of our cities are used to meet the growing needs of populations, for example housing, but without adequately catering for the employment, transport, and human service needs of these populations, there is a risk of perpetuating place-based disadvantage. There is evidence that where we live can have major influence on the opportunities afforded to us in life. Conversely, when investment into our existing communities is overlooked (such as inner urban areas), these communities are done a disservice, as their needs do not remain static over time. It is important that innovative ways are found to meet their needs at the local level – not always resorting to regional-based models.

The Discussion Paper describes some parameters of equity that are relevant to land use planning. It is important that the GARP also includes indicators and measures describing the dimensions of equity that are being addressed, to enable evidence of whether or not the desired outcome of a more equitable city is being achieved over time, and in what ways.

Social cohesion can mean many things and may contribute to exclusion

While we support the focus on achieving *a more socially cohesive place* in the Discussion Paper, what constitutes *social cohesion* is not well-defined or described. The GARP will need to better articulate what this means and what contribution land use planning will make to it.

There are potential tensions between different understandings of social cohesion. For example, it could be argued that an existing neighbourhood with uniform types of housing (low-density single dwellings) and residents of similar backgrounds and socio-economic characteristics should not have affordable housing, or housing choice introduced – on the grounds that the neighbourhood is 'socially cohesive'. That is, not-in-my-backyard (NIMBY) attitudes to diverse housing forms can potentially be justified by reference to 'social cohesion'. There is a risk that a narrative of 'social cohesion' contributes to, or justifies, social exclusion.

The built environment and land use planning can promote social inclusion

We believe the GARP could identify other social outcomes such as *social inclusion* alongside, or instead of, social cohesion. For example, a *more inclusive* Greater Adelaide would have:

- housing variety and choice
- active and public transport options
- universal design of public spaces and the public realm
- more social diversity within neighbourhoods.

This would mean that older people, children and young people, people with disabilities, migrants, and others could have their needs addressed in Greater Adelaide.

There is a need to at least maintain, if not increase, the socio-economic mix in Greater Adelaide in order to maintain the vibrancy and diversity of what makes the city an exciting and culturally enriching place to live, work and visit.

We encourage a closer examination of the social outcomes that the GARP is proposed to achieve, especially regarding social cohesion and other possible outcomes like social inclusion.

Aboriginal cultural lens on planning, design and development

The Discussion Paper recognises the importance of reconciliation, including voice, treaty, truth as part of creating *a more equitable and socially cohesive place*. This will need to be followed through into real mechanisms for better considering First Nations perspectives on how greater Adelaide grows, and how and where the associated urban development occurs.

There is no formal referral in the planning system for Aboriginal heritage matters. This creates a disconnect between the state government's roles of approving development and protecting Aboriginal heritage. A commitment should be made in the GARP to better balancing Aboriginal heritage protection and providing for the housing, employment, recreation, and service needs of our growing population.

State Planning Policy 7.2 is: *Recognise and protect Indigenous cultural heritage sites and areas of significance.* It states that 'the Planning and Design Code should implement this by identifying areas and places of national, state and local heritage value and may include the identification of places, including the extent of their cultural heritage significance.' If the Planning and Design Code does not proactively identify the extent of a place's cultural heritage significance, then looking into the cultural heritage significance of a place before development occurs should become a feature of the development application and approval process.

This is supported by mention in the Discussion Paper of the state government's commitment to implementing a First Nations Voice to the Parliament of South Australia, and the following statements:

- *We can also look at ways to incorporate Aboriginal voices and cultural knowledge in the planning system through deeper engagement.*
- *Recognise and protect Aboriginal cultural heritage through better engagement with Aboriginal peoples and identification of sites and areas of significance.*

Agreed processes for achieving these aims will need to be established and maintained to ensure a better connection between the often-conflicting responsibilities of meeting the needs of an increasing population and protecting Aboriginal heritage.

What other major trends and drivers might shape the future of Greater Adelaide?

How should a land use plan address these trends and drivers?

Strategic planning for an ageing population and people with disability

An important trend for the GARP to consider is the ageing population. We are living longer, but not healthier. South Australia has the highest proportion of older people on mainland Australia, with more than 630,500 people aged over 50, which is 37 per cent of the total population. The majority of over-65s (95 %) live independently at home, with only one in four people aged 85 and over living in aged care accommodation. (Ref: South Australia's Plan for Ageing Well 2020–2025).

We suggest there could be integration of evidence-based ageing friendly principles into the GARP, with consideration given to Adelaide formally becoming an Age Friendly City.

The principles of living locally are aligned to age-friendly communities but they need to go further. There is a need to consider land uses that enable ageing in place, given most older people live independently. Land use planning is needed for accessible and diverse housing options, as well as retirement villages and aged care facilities, so that people don't need to leave their neighbourhoods, families, and social supports in order to access increased supports as they age.

This approach aligns with demographic trends in South Australia, the United Nations Sustainable Development Goals, World Health Organisation, etc.

Useful resources: National programmes for age-friendly cities and communities (who.int)

Similarly, there is a growing need to create environments that are accessible for people with disability. Long term policies of deinstitutionalisation have meant that more people with disability are living in the community. However, we have legacy environments that are not accessible, including housing, commercial and civic buildings, and the public realm.

The GARP will need to be consistent with the Principles of Good Planning which include universal design practices. The goals of Universal Design should be expressed in the GARP to ensure the built environments of the future are accessible to the widest possible range of people. This goes beyond meeting the minimum requirements of the *Disability Discrimination Act, 1992*.

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

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

A critical gap for both greenfield and infill development is integrated planning, coordinated delivery, and sufficient funding for social infrastructure

A key need which the GARP could address is for a more coherent and consistent approach to planning and delivery of social infrastructure. This would support the aspiration for a more equitable city, as well as help to deliver the vision for living locally.

South Australia needs more effective and systemic mechanisms for this category of infrastructure delivery. There hasn't been a shared resource to inform social infrastructure planning in this state since the 1990s (Human Services Planning Kit). Despite being around 30 years old, this tool is still used by some consultants in SA, along with interstate social infrastructure planning tools that were designed for very different contexts.

We believe there is a need to develop contemporary planning methods, definitions, resources, processes, and funding mechanisms for social infrastructure which are tailored for the South Australian planning system and address community needs in both infill and greenfield communities. The GARP will provide the impetus for addressing this gap, as it will set the strategic direction for the neighbourhoods that house the majority of the state's residential population.

About social infrastructure

Although social infrastructure is globally recognised as an important infrastructure category, it has no universal definition.

Infrastructure Australia defines it as 'the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities' and has recognised our 'growing and aging population, increasing urbanisation, advancements in technology, and changing work patterns will impact the social infrastructure sector over the next 15 years and beyond' (Ref: A spotlight on social infrastructure - Infrastructure Magazine).

The planning and provision of infrastructure for what is often referred to as 'human services', such as essential health and education facilities, is often the focus when addressing the large-scale social infrastructure needs of our ever-expanding communities, however, planning for localised social infrastructure is important too. These are tangible facilities like community centres, libraries, art/cultural precincts, and intangible or 'soft' infrastructure like social networks, knowing your neighbour, or home supports that help with cleaning and cooking. They can be private spaces, like cafes or cinemas, or they can be public, like cultural centres or parks, and increasingly they can be a mix of both. Land use planning has a role in enabling this infrastructure to be delivered in-step with community need.

Often localised social infrastructure is not valued until there is an immediate need such as concentrated job losses, social conflict or in most recent events a global COVID-19 pandemic. This is despite Infrastructure Australia recognising 'the important cultural and economic contributions that social infrastructure make'. With the recent global pandemic, it is an opportune time to revisit the value of localised social infrastructure and seek out ways to embed innovative examples within our communities for the benefit of current and future generations. Land use planning has a role here.

Despite recognition of the fundamental importance of social infrastructure, it continues to appear low on the priority list for strategic and major funding. State funding supporting the GARP outcomes should be available to better enable the sophisticated delivery of this essential localised infrastructure.

Other jurisdictions in Australia have implemented mechanisms for better social infrastructure planning and delivery, including regional and precinct infrastructure plans, developer contribution schemes, contribution plans, agreed thresholds, partnerships, and co-location models. South Australia could also consider how value capture from upzoning and public realm upgrades can be reinvested in social infrastructure to meet the needs of current and future residents.

Localised social infrastructure is essential to living locally

Localised social infrastructure planning and provision, within cities and local neighbourhoods is often ad hoc and, at worst, an afterthought. It is usually not afforded the same strategic planning and value as other infrastructure types, such as sport and recreation facilities, and open space.

The Discussion Paper identifies that 'major infrastructure' will be planned by the state, however the concept of living locally will not be realised unless social infrastructure is available within neighbourhoods. This creates a tension for the GARP to address. Clearly it will not be possible to include all local social infrastructure in the GARP, considering it caters for an area that will be home to more than 2 million people, but only addressing higher order major infrastructure in the GARP will leave a vacuum that is unlikely to be addressed by the 27 local governments across Greater Adelaide, nor the urban development industry, or service providers.

Whilst there is logic for large-scale delivery of health and social services, such as specialised hospitals based in Adelaide, increasingly people should be able to rely on their local surroundings to meet their everyday essential needs first and foremost (social connection, education, childcare, dental, medical, affordable fresh food), as well as land uses for leisure and entertainment. There is a growing evidence base that suggests adequate and proactive investment in these types of assets for communities not only assists them to cope in times of need, but it also helps facilitate their longer term wellbeing and ability to thrive.

Education facilities are an example that need greater attention. Education is an up-stream determinant of health, and schools are an important site for building networks and social inclusion in local communities. Schools also require good land use planning and design to ensure they:

- are well located and accessible in the student catchment they serve
- support co-location with open space, and sport/recreation and other community facilities
- promote active transport by students
- are delivered in a timely way to meet community need and aspiration
- do not require expensive land purchases at residential prices.

Coordinated outcomes such as these require careful planning – there is an urgent need for better leadership and policy direction for planning education infrastructure in South Australia.

Not assessing the capacity of social infrastructure in existing neighbourhoods that are subject to infill development will have a negative impact on the social licence for infill. When people can't get their children into a local childcare centre, school or sporting club, they will resist further urban densification. It is therefore

essential that modelling is done for social infrastructure capacity and the additional demand that comes from new housing development.

Public and active transport should be a bigger focus

The GARP should include a stronger vision for a transport system for Greater Adelaide that enables a shift from private vehicles to other modes of travel.

There is a growing movement in South Australia calling for cycling infrastructure that is safe for younger people, older people, and everyone in between. This is not only for leisure, but importantly also for daily travel needs. Living locally will require viable alternative transport options.

Without significant investment in cycling infrastructure within our state, along major transport corridors, planned into the fabric of proposed satellite cities, and considered as part of every major transport strategy and upgrade, the conditions required to provide safe cycling infrastructure will never be realised.

It is imperative the government take on this agenda in a strategic and coordinated way. A long term and committed investment in cycling infrastructure is also an investment in tackling climate change, investing in the health and wellbeing of all citizens, as well as tackling increasing cost of living pressures. This investment and strategic planning would be a tangible and innovative way to meet the needs of future generations. Significant state involvement is required in this, as the local government role alone is not at the scale required to have the necessary impact.

Better approaches to neighbourhood and sub-regional scale planning for transport are required so that alternatives to private vehicle use become attractive and viable for short distances, and so that mass transit is available for longer distances. This may also require setting more ambitious housing density targets to support viable transport systems and a greater density of destinations (e.g. services, facilities) within reach of local neighbourhoods.

The greenfield investigation areas identified in the Discussion Paper are mainly aligned to road corridors. This sets up a dependence on road infrastructure in meeting the associated transport needs and there is no substantial discussion of mass transit services to these areas. For example, Murray Bridge is just one hour from the Adelaide CBD by car. There is a risk that a large new residential development located there would generate substantial traffic on the South Eastern Freeway if there are insufficient local jobs created and the SE Freeway will already be under increased pressure from future growth in and around Mount Barker.

Strategic planning for housing affordability and diversity is needed

Affordable and social housing should not be left to greenfield development on the urban fringe. This creates a car-dependent lifestyle with significant impact on household finances, especially felt by those on lower incomes. This creates a problem for achieving a more equitable place.

It is also important to not inadvertently plan families out of cities. With a lot of two parent households in which both parents are working, it is important that people can live close to where they work, and their children can attend school along the way. The GARP should allow for the fact that not all families want to live on large blocks. Considering increasing cost of living pressures, these families need to be working, and any spare time is usually spent recreating or caring for the family members – many don't have the time or resources to maintain larger spaces. Quality public open space plays a critical role in meeting these needs in urban areas, allowing families to not have to move neighbourhoods based on the changing needs of their families.

The trend to smaller households also needs to be better addressed with regard to new housing stock. Unfortunately, it seems that most new dwellings continue to be built with three or four bedrooms and there are not enough smaller dwellings available for small households, to reduce housing costs and for those wanting to downsize within familiar neighbourhoods.

In general, we support the redevelopment of existing suburbs along with strategic and other infill, in preference to the continued expansion of the urban fringe. There is capacity for Greater Adelaide to become a much denser city, which would support liveability, including better availability of services and facilities in local neighbourhoods. Low density greenfield development is both expensive to service (for new infrastructure) and expensive for households to operate due to transport related costs. Without a radically new approach to planning and delivering services and mass transit to these outer suburban communities, there will be continuing inequity for their residents.

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

What are the most important factors for the Commission to consider in reviewing and achieving the Urban Green Cover Target? (20% increase by 2045)

Stronger mechanisms are needed for boosting tree cover and urban greening

Trees and green spaces are essential for human health. Current efforts to maintain and expand tree cover and urban greening appear to be inadequate. This issue requires investment driven at the state level, to complement efforts by local government.

The impact of urban infill on greening and the loss of existing trees is a significant concern, necessitating stronger policy and requirements at the project level as well as mechanisms to set targets, plan, and allocate resources for urban greening at sub-regional and neighbourhood scale.

Conclusion

The GARP is an important opportunity to set the direction for how Greater Adelaide grows, and what it is like to live here, into the future. Central to this is the field of urban planning's role in planning for people. In order to set strategic direction that addresses concerns relating to our legacy urban form, costs of living, and pressure on the environment, more ambitious, bold, even radical action may be required. The GARP should be brave in leading change of the scale required to achieve its aims.

The Discussion Paper encompasses some important social factors and outcomes of urban planning and development, including equity and social cohesion (inclusion). It also sets out the physical parameters for accommodating population growth, via targeted infill and regeneration, and greenfield development.

This submission supports many of the aims and desired outcomes expressed in the Discussion Paper and provides encouragement for them to be taken further towards bold systemic change that influences markets and provides for better social, environmental and cultural outcomes of urban development.

To realise the concept of living locally in a way that works for people, real mechanisms, including those that influence market factors, will need to be in place to achieve sufficient local provision of employment, education, active transport, health and social service, retail, entertainment and opportunities to connect. Without mechanisms to impel the market to respond there is a risk of establishing new residential areas in satellite city locations without the increased social infrastructure needed to make living locally more possible. It is critically important that the GARP balances these aspects so there is not a mismatch between a focus on satellite growth areas and the aspirations of living locally, and that transport needs are properly considered to achieve positive lifestyles.

Delivering the GARP will rely on the alignment of the various mechanisms within the planning system to respond to the changes required, and the resources to make it all happen. A great challenge to achieving via the GARP the outcomes identified in the Discussion Paper, and any more expansive notions, is ensuring that

each urban development action taken via application of the State Planning Policies and the Planning and Design Code contributes to the future picture painted by the GARP vision.

On behalf of the Social Planners Network of South Australia, thank you for the opportunity to contribute to the development of the Greater Adelaide Regional Plan.

Any questions about the content of this submission can be directed to Penny Worland on Email: [redacted] or PH [redacted]

Yours Sincerely

Penny Worland

Convenor

On behalf of the Social Planners Network of South Australia

DTI:PlanSA Submissions

From: Alicia Clutterham [redacted]
Sent: Monday, 6 November 2023 3:18 PM
To: DTI:PlanSA Submissions
Subject: South Australian Cricket Association - Greater Adelaide Regional Plan Discussion Paper - Submission November 2023
Attachments: SACA GARP Submission 6 November 2023.pdf

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To whom it may concern

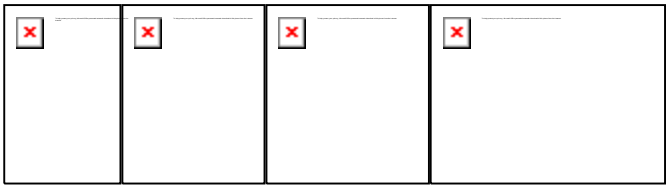
Please find attached a submission from the South Australian Cricket Association on the greater Adelaide Regional Plan Discussion Paper.

We thank the Department for the opportunity to make this submission and welcome further engagement as the GARP progresses.

Should you have any enquiries, please do not hesitate to contact me on [redacted] or [redacted]

Warm regards
Alicia

Alicia Clutterham | Manager - Facilities & Infrastructure | SACA
South Australian Cricket Association | Adelaide Oval | North Adelaide 5006 | South Australia
[redacted]
www.saca.com.au | www.adelaidestrikers.com.au



At SACA we are proud to live, work and play cricket on Kaurna land. We acknowledge the Kaurna people as the Traditional Custodians of this country and we pay our respects to Kaurna Elders past, present and emerging. We also extend that respect to all traditional owners of country throughout South Australia. Please click here to learn more about SACA's commitment to Reconciliation.

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SOUTH AUSTRALIAN CRICKET ASSOCIATION LTD.
ABN 44 623 135 393
ADELAIDE OVAL
PO BOX 545, NORTH ADELAIDE, SA 5006
ADMINISTRATION
P: 08 8300 3800 | F: 08 8231 4346 | E: sacareception@saca.com.au
MEMBERSHIP
P: 08 8300 3232 | E: membership@saca.com.au

Mr Craig Holden
Chair
State Planning Commission
c/o Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

6 November 2023

Dear Mr Holden,

Greater Adelaide Regional Plan Discussion Paper

As the peak body for cricket in South Australia, the South Australian Cricket Association (SACA) is responsible for managing, promoting and developing the game of cricket in South Australia.

SACA welcomes the opportunity to make a submission as part of the consultation for the 'Greater Adelaide Regional Plan Discussion Paper' (GARPDP) in recognition that sport and recreational infrastructure is critical to the health, wellbeing and quality of life for South Australians.

SACA is committed to working with all levels of government in developing quality facilities that provide enhanced liveability and a welcoming environment for all players, officials, volunteers and fans across South Australia.

In 2022/23, over 45,600 people played organised cricket in South Australia, some from as young as five years old.

Population Growth Challenges

It is very important that sporting oval and facility provision is considered in the context of population growth within both infill areas and Greater Adelaide greenfield sites.

The population growth experienced in recent years in the southern suburbs has presented multiple challenges with regard to provision for number of and appropriate cricket facilities (both on and off field). Specific examples include Brighton Cricket Club, Reynella Cricket Club and Southern Districts Cricket Club not having the number of and suitable venues to play cricket each week. Both the Reynella Cricket Club and Southern Districts Cricket Club have had teams travelling into the Adelaide Park Lands to play home games with up to 45-60mins travel needed each way.

This experience has highlighted the importance of the need to plan for and provide for population growth areas outlined in the GARPDP with significant potential growth noted for the Outer North.

A concerted and coordinated approach between developers (if relevant), Councils, State Government and State Sporting Organisations early in the land use planning process is critical.

A number of Councils across metropolitan Adelaide are already experiencing a lack of places to play cricket with the issue expected to intensify with higher density development and urban infill.

Education Site Access

There is a strong need, particularly at infill locations for school sites to be accessible (through formalised hire agreements) to cricket clubs for after school hours access to cater for these growing populations. One of the key priorities in the South Australian Cricket Infrastructure Strategy is to provide new playing fields and access to school sites (outside of school hours).

SACA has recently introduced a new funding program called Places to Play. This program provides a $20,000 grant to a school for a new cricket pitch in schools with the grant contingent on the school and local cricket club entering into an MOU to provide the oval for junior cricket on the weekend and outside of hours needed by the school. To date, SACA has issued 19 primary and secondary schools with new cricket pitches in 2022 and 2023, with another 20 to be issued in 2024.

The development of state government principles, policy and incentives to support sporting utilisation of school sites would assist the implementation and utilisation of school sites for out of school hours sporting activities.

In acknowledging that creating new ovals and playing fields within existing inner city metropolitan locations will not be possible, alternative solutions such as oval lighting (at community and school sites) is also a priority. This could extend the capacity of existing sporting facilities into evening hours where areas are experiencing growing populations through urban infill and high density development.

Planning System

SACA recommends that greater consideration is needed for appropriate land to be set aside for sporting oval / playing fields and associated infrastructure within the planning system.

The existing 12.5% open space allocation, whilst valuable for the provision of open space such as playgrounds, pocket parks and drainage reserves, is rarely considered for the provision of much needed sporting and community hubs. There are numerous examples of appropriately planned and designed community and sporting hubs located within residential developments interstate which could be replicated within South Australian growth corridors. Examples of this have occurred in Victoria at the Casey City Council, Hume City Council and the City of Melton through the Victorian Governments Growing Suburbs Fund (GSF).

In addition to the current need for a formalised mechanism for the provision of sporting facilities (as occurs with open space under the *Planning, Development and Infrastructure Act 2016*), a fund is required for sporting facility provision to assist with the delivery of this infrastructure.

The provision of land for sport and recreation facilities requires inter-agency consideration with the Department for Infrastructure and Transport; Department for Education; and Office for Recreation, Sport and Racing working with Local Government and State Sporting Associations to address current and future needs. As the peak body for cricket in South Australia, SACA is willing to provide pro-bono advice to these agencies on the facility provision required for cricket in South Australia.

In relation to playing fields for cricket, there are a number of metropolitan areas that are experiencing pressures due to the scarcity of available playing fields with off field amenities such as toilets and changerooms. These areas include the north eastern, southern metropolitan and all areas immediately surrounding the Adelaide CBD.

With the forecast population growth outlined in the GARPDP, it is imperative that there is a mechanism within the South Australian planning system to facilitate the adequate provision of sporting spaces and infrastructure, in addition to open space which primarily addresses parks, playgrounds, streetscapes and stormwater detention/drainage.

Thank you again for the opportunity to provide feedback on the Greater Adelaide Regional Plan Discussion Paper. SACA would welcome a meeting with the Department for Infrastructure and Transport to further discuss the opportunities raised in this letter.

Please contact me at [redacted] or [redacted] if you would like further information.

Yours sincerely,

[redacted]

Alicia Clutterham
Manager Facilities and Infrastructure
South Australian Cricket Association

DTI:PlanSA Submissions

From: Maddie McShane <[redacted]>
Sent: Monday, 6 November 2023 4:56 PM
To: DTI:PlanSA Submissions
Subject: Submission- Greater Adelaide Regional Plan Discussion Paper
Attachments: SAGE Submission.docx

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Hi,

Please find attached the following submission to the Greater Adelaide Regional Plan Discussion Paper on behalf of the South Australian Grassroots Ecosystem 'SAGE'.

We appreciate the opportunity to be involved in the consultation and look forward to further engagement.

Warmly,
Maddie.

Organiser, SAGE.

South Australian Grassroots Ecosystem
The Joinery
111 Franklin Street 5000
Email: sagrassrootsecosystem@gmail.com

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

Monday 6 November 2023

Re: Submissions on the Greater Adelaide Regional Plan Discussion Paper

To whom it may concern,

The South Australian Grassroots Ecosystem ('SAGE') appreciates the opportunity to provide this submission to consultation on the development of the Greater Adelaide Regional Plan ('GARP') Discussion Paper. SAGE is a community body working at the intersection of sustainability and wellbeing. SAGE has over 550 members and holds monthly community events that regularly draws attendances of over 100 members to build connections, empower community action and educate on sustainability and related practices. We are actively involved with several bodies of work regarding issues of social inequity, nature protection and restoration, climate action and community engagement. Hence, we hold a particular interest in contributing community perspectives towards the development of the GARP.

As a self-described "grassroots ecosystem" we operate as a community of communities. Our events attract a mix of young people, active citizens and industry professionals with a primary interest in nature, the environment and community resilience, as well as regenerative ways of living and working.

The SAGE community comes from a range of professional backgrounds including; ecology, veterinary, design, professional services, non-profit leadership, local government, public policy, media, art, music, gardening, self-sufficiency and various nature related and non-nature related professions and work.

The GARP was discussed at three different SAGE events; at our monthly gatherings in September and October, and then as part of the Youth Forum in collaboration with the department in November. The majority of the following comments have been transcribed or

synthesized from a consultative workshop at a SAGE event on the 29th of October, further supplemented from other discussions.

Engagement with the GARP included 100 people in face-to-face workshops and over 800 people through our online promotion of the two SAGE events and the Youth Forum.

We note that these views are only representative of a portion of SAGE members, and are not intended to be representative of the community in its entirety. We also acknowledge that these views may be, at least in some regard, incomplete or fragmentary in their nature, as they are derived from multiple different voices which may not always be consistent in every regard.

Finally, we wish to emphasise that if there is any confusion in the interpretation of the following comments, the department is welcome to reach out via email to seek clarity.

We hope that the following discussion and comments will be helpful in guiding the development of the regional plan for a more sustainable and equitable future.

Outcome 1: A greener, wilder and climate resilient environment.

The SAGE community unanimously identified that the goal of Adelaide becoming *cooler, greener and wilder* should be treated as a priority. We commend the GARP Discussion paper on identifying climate impacts, biodiversity loss, food and water security and changing mobility systems among the key trends and drivers in this area, and wish to emphasise the integral role which these trends should play in underpinning our policies. Acknowledging the severity of our environmental crisis is essential, recognizing that we are amidst the 6th mass extinction.

To have a cooler, greener and wilder city, we must have a more *biodiverse* city, one which truly supports functional ecosystems beyond the construction of simpler environments. It is imperative to transform our approach to biodiversity, emphasising functional ecosystems and recognising the role that they can play in climate mitigation and adaptation. This may require challenging existing assumptions, such as the notion of “low maintenance landscapes.” We should consider substantial investment in active and community-based landscape management, as the benefits in terms of biodiversity, employment, and ecosystem services far outweigh the costs.

In effort to advance on these issues and so many more, it's crucial that our measures of success are primarily based on ecological knowledge. To achieve this, fostering a more extensive dialogue, engagement and practice between governance bodies and ecologists is essential. Scientific evidence should be the primary driver of environmental policy, which requires establishing suitable structures for planners to receive informed guidance from ecologists. The best available evidence is accessible, if you are willing to integrate it into political decision making, and as numerous international reports suggest (e.g. IPCC Sixth Assessment Report, Climate Change) unless action is taken significant impacts on biodiversity, health, and ergo our economy will be apparent.

SAGE generally supports the priorities and directions identified in the GARP discussion paper, but emphasises that the wording could be strengthened to ensure that serious and adequate investment is directed towards achieving the desired objectives at the necessary scale. For example, regarding many objectives, it is noted that the planning system may be able to "identify areas" for protection and "consider risk mitigation and adaptation strategies." This is, of course, absolutely integral, but must be coupled with support to enable the genuinely development and implementation of the risk mitigation and adaptation strategies. Recognising the inherent limitations of the planning commission, SAGE endorses collaboration between government departments to ensure planning is effective.

Outcome 2: A more equitable and socially cohesive place.

Our members support the prioritisation around an equitable and socially cohesive place, however we'd like to see explicit language that showed accountability towards

SAGE advocates for equitable communities that are walkable, resilient, and accessible to all, catering to diverse needs and populations. Emphasising robust public and active transport infrastructure is crucial for ensuring people can access necessary services. Our vision promotes community planning centred on people, nature, culture, and services, prioritising these over car-centric approaches.

SAGE endorses PlanSA's *SPP1: Integrated Planning*, recognizing that concentrating growth around major physical and social infrastructure can yield positive community outcomes. We stress the critical need to provide cost-effective and accessible infrastructure and services for all. Additionally, we recommend conducting further research and planning to develop mechanisms ensuring the affordability of these essential services. We also endorse SPP 2: Design Quality and SPP 3: Adaptive Reuse, emphasising their mutual complementarity, as adaptive reuse initiatives can naturally promote high design quality standards. We advocate for ecologically informed design policies which make use of underutilised resources to enhance outcomes for nature and people.

However, the current plan does not do enough to deliver the kind of ambitious step change required to direct Adelaide to a future that is akin to a walkable, community-oriented european style city rather than a car dependent, socially inequitable american style city.

Outcome 3: A strong economy built on a smarter, cleaner, regenerative future

SAGE wishes to draw attention to the potential economic benefits of engaging the workforce in work regarding environmental restoration and management. Growing the industry of environmental restoration and management is essential for supporting the agricultural and tourism sectors, as well as being integral for supporting our natural heritage. We advocate for planning which facilitates the growth of the environmental sector, and note that this is complementary with the department's identified principle of regenerative planning.

SAGE identified that we need to understand more about the identification of employment lands before we are able to offer comment in this area, and encourage that further consultation be undertaken in this area.

Outcome 4: A greater choice of housing in the right places

SAGE supports the observations made by the Mt Barker and District Residents Association Inc., which questions the housing and development-centric approach centred on the vague assumption of mandatory population growth. SAGE believes it is crucial to critically consider this premise and thoroughly evaluate, firstly, whether population growth is inevitable, and secondly, to what extent such growth genuinely necessitates new development and to what extent it can be facilitated within our existing infrastructural capacity.

To expand on this point, we note that we are in a rental crisis, not a housing crisis. The proportion of vacant dwellings in Greater Adelaide is not unsubstantial, but people are unable to access these dwellings because of financial barriers and the inherent inequity of the housing market. The occurrence of systems like Airbnb have worsened this inequity; with short term housing reserves increasing barriers to access.SAGE recognises that the solutions to many of these problems may require legislative advances to enhance the rights of renters, and this may be beyond the scope of what GARP can achieve, however, we encourage the department to support such advances wherever possible. Further, we call for the incorporation of more social and affordable housing into future developments.

There is also an extreme waste of housing resources with Australia building the world's largest dwellings, despite an ever-increasing number of single person households. Continued peri-urban sprawl is only serving to continue this unsustainable growth.

In light of anticipated development, SAGE advocates for housing development strategies that *prioritise urban infill over greenfield development.* This approach encourages the efficient use of existing urban spaces and infrastructure, minimising environmental impact and preserving greenfield areas from unnecessary development. Urban infill not only promotes sustainable growth but also enhances the overall resilience and livability of established communities.

We hope that this discussion, in combination with the followings recommendations and workshop feedback, will help in the development of policy for a sustainable future. We are appreciative of being involved in the consultation process, and look forward to responding to the department's "What we heard" release.

Kind Regards,

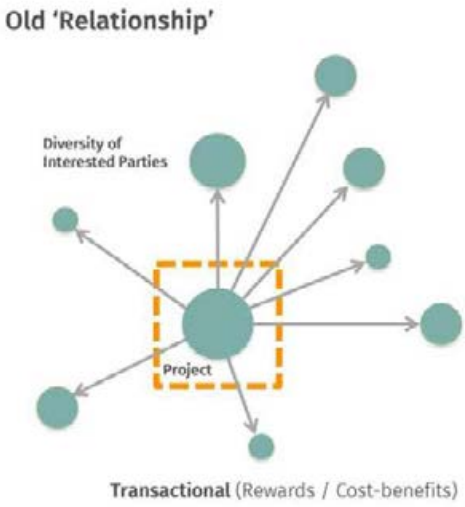
South Australian Grassroots Ecosystem ('SAGE').

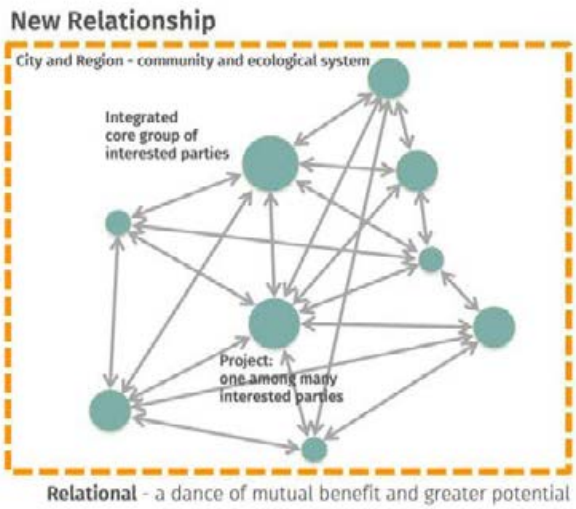
Key Recommendations

5 key recommendations have been summarised below according to the themes which arose most frequently across the different discussions during SAGE community consultations and workshops.

1. ***Engaged planning and active citizenship is vital to establish a thriving, biodiverse city.***

Contemporary planning makes attempts to actively engagement citizens and those affected by developments whether that be physical, social or ecological infrastructure. While we acknowledge the barriers to authentic engagement beyond consultation, it is necessary to empower citizens to contribute to our broader society. We recommend the government to have the courage to take a critical review, and ongoing critical reflexivity to consider the ethical and moral impacts of the decisions made on behalf of our population. In addition, we recommend decentralised investment in and engagement with systems organisers and connectors that enable government to have ongoing collaboration through-out projects, rather than purely within consultation periods which allows for ongoing feedback. This would enable a shift from extractive relationships to relationships based on mutual-benefit.





2. ***Prioritizing active transport infrastructure is imperative.***

Our members support active transport and living locally, however we'd like to see more attention given to the fact that transport makes up 23% of Australia's contributions to global C02 emissions, and of this contribution, 45% is made up of passenger cars[1]. This is a statistic that we have the power to change through good urban planning in cities like Adelaide.

[1] Source: ARUP, See Appendix 1.

In the face of a worsening climate crisis and rapid urbanization, urban design experts emphatically advocate the importance of supporting the transition away from a car-dependent society*, to a society where active transport is an accessible option for all*. Vital components of this shift, like well-developed bike lanes, are absolutely essential. Extensive case studies unequivocally demonstrate their transformative impact on people's health, the environment, businesses, and communities[2]. Ignoring this imperative transition jeopardizes our well-being and the sustainability of our cities.

A great deal of discussion was intensely critical of government investment priorities. It is deeply unacceptable that of the $9.9 billion spent on roads and public transport over the last four years, less than 1% of this on active transport infrastructure.[3] We note that the GARP should be poised to facilitate government investment in active transport. A recent response by DIT to enquiries from InDaily has shown that the massive road investment serves only to increase traffic and congestion,[4] yet the GARP still continues to insist on investing significant resources into road infrastructure.

We call on the meaningful development and enactment of plans like the Cycling Strategy 2022-2032,[5] which, despite being drafted with the intention to improve community outcomes around cycling, have failed to be put into action.

It is important to acknowledge that while Adelaide has historically been a car-centric city impart due to it's heritage as place of manufacturing for Holden cars, this legacy can be acknowledged in other ways that do not detract from the sustainability and health goals that active transport enable in our society. [6]Furthermore, it should be acknowledged that world-renowned countries such as the Netherlands where 1 in 4 journeys are made by bicycle, were as car dependent as Adelaide in the 1970s. This shows that the transition to an active-transport centric Adelaide is not out of the question if the necessary political and social will is created for active-travel to become part of our socio-cultural fabric.

3. Investing in efficient, prolific, and accessible public transport is crucial.

SAGE appreciates that the GARP Discussion Paper has brought and acknowledgement of the growth of our changing mobility systems, but advocates that planning policy goes further in enshrining an actionable plan for *efficient, prolific and accessible public transport* across Greater Adelaide.

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[2] See, for example: Pucher, John, and Ralph Buehler. "Walking and cycling for healthy cities." *Built environment* 36.4 (2010): 391-414.

[3]https://www.statebudget.sa.gov.au/__data/assets/pdf_file/0020/914213/23-24-State-Budget-Overview.pdf?fbclid=IwAR0Th1g43hGNH1SB-rFAXYBttpMuCb8FWJKUcCD40hzi_vJmRd8Ahlo1pJ8

[4] https://indaily.com.au/news/2023/11/02/slowdown-adelaides-traffic-grind-revealed-in-new-official-data/

[5]https://www.dit.sa.gov.au/__data/assets/pdf_file/0016/1004272/Cycling_Strategy_Refresh_Draft_11022022.pdf?fbclid=IwAR1MJlQsmX0HIyigW4QgsKOj6ca6joNwpOn3qmSPdftYJFVyvYeFLHr132c

[6] https://www.centreforpublicimpact.org/case-study/focusing-bicycles-transport-urban-netherlands

Transitioning to a greater dependence on public transport systems is essential for enhancing the sustainability of a city, but it also has many potentially positive impacts on communities and local economies. Greater investment in public transportation expands service and improves mobility. If sustained over time, it has many potential economic impacts, including providing travel cost savings and reduced traffic congestion leading to greater business productivity and operating cost savings.[7] SAGE again wishes to draw attention to the historically poor levels of investment in public transport systems, and call that this be reconsidered as a priority in the upcoming policy.

4. Emphasizing medium density, mixed-use development is necessary.

SAGE supports medium to high-density infill in the CBD and surrounding suburbs as a highly effective strategy for climate, social, and economic sustainability. Research shows that cities investing in mixed-use and high-density living can increase property values and tax income. [8]

This financial boost enables the state to invest in proven climate measures like planting trees, increasing canopy cover, and enhancing cycling infrastructure. SAGE points to countries like the Netherlands, where mixed-use and high-density communities foster social interactions, creating a friendly and cohesive environment for all residents.[9]

5. Avoiding additional greenfield development is essential.

Our members oppose greenfield housing and further we oppose the extension of urban sprawl and the loss of our valuable farmland and environmental surrounds. We would like to see an investment within the plan towards undertaking extensive environmental restoration on the necessary scale to reverse biodiversity loss are paramount. Countries such as New Zealand reflect the social and economic benefits of restoring and extending nature spaces around our cities and Adelaide as a recognised nature tourism destination should be reflecting this investment in nature preservation and restoration in our city surrounds.

Beyond Greater Adelaide's urban area, urgent broadscale habitat restoration is crucial, particularly in the Mt Lofty Ranges, to mitigate the impacts of an extinction debt. We recognise that allowing housing to further encroach on greenfield spaces poses substantial risks to our environmental and agricultural values. As highlighted by the Sellicks Woodlands and Wetlands Action Group in their submission *"Within the Mt Lofty Ranges 150,000 hectares of new restoration are required, or over a century of work at current rates. This can be scaled up to achieve the target in the time frame required of the next 50 years, but we must start now by protecting farmland from greenfield development and prioritising broadscale restoration*

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[7] http://reconnectingamerica.org/assets/Uploads/economicimpactofpublictransportationinvestment.pdf
[8] Tong, C. O., and S. C. Wong. "The advantages of a high density, mixed land use, linear urban development." *Transportation* 24 (1997): 295-307.
[9] https://www.tandfonline.com/doi/abs/10.1080/23748834.2022.2067439

programs commensurate with the scales required."[10] We wish to direct the department's attention to the scale of investment drastically required in this area, and the need to halt further greenfield developments.

[10]file://uofa/users$/users3/a1766153/Downloads/Inadequate-Urban-Canopy-Cover-Targets-SWWAN-2023.pdf

Co-Design Workshop for Direct Participant Feedback

SAGE engaged Dr Aaron Davis, a Lecturer in Architecture and an expert in co-design at the University of South Australia to run a collaborative design process with SAGE community members.

42 people were in attendance, with attendees working in small groups of three to discuss and then share what they wanted to see included in the plan. Participants were provided with snapshots of academic research on issues to do with sustainable urbanism, and asked to respond by considering how decisions would change in a scenario where “everyone knew” these facts rather than being swayed by lobbyists.

Part A: Responses to what we know about healthy sustainable cities

This listing is the collated output from attendees at Dr Davis session. Each dot point is the contribution of an individual. Individuals were invited to write more than one item, while a few attendees wrote two items, generally the feedback below matched one item of feedback from people in attendance.

- To make a walkable city and walkable communities we need clear steps ASAP!
- The more driving = greater risk of obesity (we could have walkability scores + chronic disease scores on every house for sale!
- State Government and local Councils could be spending money on greenspaces, bike lanes and walkable community infrastructure supporting healthy urban infill instead of unsustainable sprawl.
- Every plan should start with what is wanted and what outcomes we want to see in the long term.
- Safe road design policies often incorporate things which make roads look more designed for humans, eg. perhaps look more ‘dangerous,’ forcing drivers to be more vigilant.
- Good + healthy communities need
    - Less waste

    - More equity
    - Wildlife corridors
    - Preservation of native plants
- We can reduce the size of roads to create some green corridors, concluding soft mobilities (walking, biking etc) as well as public transport (esp. trams) with their own defined spaces
- Our roads are far too large. Reducing the size of our roads will create so much more space for livelihoods, employment, recreation, culture and nature.
- Smaller roads make people drive more safely. Effectively, roads which look as if they are designed for humans and not cars, create better results for wellbeing.
- Physically separated bike lanes are needed for safety; paint is not protection.
- ‘High maintenance’ green spaces have incredible outcomes for biodiversity, climate, employment, the economy, amenity and wellbeing.
- The power of greening the pedestrian networks we already have - that would:
    - Encourage walking/exercise to local destinations
    - Improve The biophilic experience built in to our active transport network
- Property developers have a profit incentive to build the slums of the future
- Walking/riding a bike to work or your place of study will improve your focus and productivity. At scale this creates more wealth and prosperity amongst our local communities and local economies.
- We can plan for medium density housing and not allow endless sprawl
- People choose cars due to lack of accessibility and unreliability of buses etc.
- We can have safer, more enjoyable walking pathways which will encourage more walking!
- Our cities are already often built on our est agricultural land and urban sprawl is currently one of the biggest threats to prime producing areas like the Hills and Virginia

- More colour in cities = more life and variety in activity and life forms, less depressing suburban lifestyle
- Isolation in a house is not a home - we need open community engagement
- We can be solar positive
- We can build vertically, not horizontally + reuse/repurpose buildings for others in need
- We should celebrate culture as an urban planning priority eg. funky community spaces
    - Cafes, gardens, laneways, events
    - unplanned , wildness and character, pathways to explore -> better mental health
- Every $1 spent on climate adaptation saves $6 in future costs
- We need to ditch the assumption that population growth equates to economic growth. There are finite resources.
- We cannot rely on the existing planning framework to deliver adequate outcomes, particularly in regard to meeting environmental targets.
- Government pay for the cost of less sustainable public housing.
- With the right policy and infrastructure, urban infill can actually lead to more green space.
- We do not necessarily need 300,000 new homes. This assumption is based on trends of constant developments. It may be possible to facilitate many aspects of the growing population within our current housing arrangements - by focussing on enabling more flexible housing arrangements, share housing, subdividing to create smaller dwellings, etc. We do not always need to grow! We may just need to improve what we have.

Part B: Responses to the prompt “Over the next 3 decades we should….”

Participants were invited to stand in the future and consider Greater Adelaide, three decades from now. Participants discussed this concept in small groups of three and then wrote down what they wanted to see included in the plan from this perspective of looking 30 years ahead.

Making Adelaide Cooler, Greener and Wilder.

Green Spaces and Biodiversity

- Ecological and botanical knowledge should inform landscape design. Biodiverse green spaces need to contain more than just a few nationally native plants; rather, they should contain a strategically constructed mix of endemic plants which are best poised to withstand local pressures and support environmental outcomes in the area. It is important that urban green spaces provide safe havens for local biodiversity and native animals threatened by habitat loss.
- We should have more public open space which contains biodiversity and native plantings (less lawn!).
- Better management of stormwater runoff. Well designed gutters and permeable surfaces, such as rain gardens, which properly catch and direct water, mitigate flood risk and decrease pollution in waterways.
- Increase the proportion of permeable surfaces.
- Native local plants focus in city and suburban green-spaces.
- Natural spaces should be designed to cool spaces down and reduce CO2.
- More mangrove and saltmarsh reserves to increase the abundance of highly productive, carbon sequestering ecosystems. These systems are critical for drawing down carbon from our atmosphere and must be protected and increased in the face of climate change and increasing emissions.
- More accessible cool areas in heat waves and accessible water sources. Examples of this include libraries and parks with wading pools/creeks and lots of trees (such as Tusmore Park & Wading Pool in Burnside) for families without air conditioning to retreat to during heatwaves. This is especially important in lower

socio-economic areas that often have less cool green spaces and less access to air conditioning.

- We need to prioritise addressing the biodiversity crises and 6th mass extinction in the planning because too many elements of the plan do not address it at all.
- Have compulsory education on biodiversity and climate change in high schools.
- Business engagement with climate issues.
- Inadequate Canopy cover. 5 years ago in 2018 councils made a huge mathematical mistake setting their targets at 70-90% below industry recommendations. CofOnk 15% by 2045, PAE 16% by 2045, Holdfast Bay 16.8% Other councils are nearly as bad. We are asking for immediate action on this.

- As young people who will be inheriting this planet and city, we also seek more long term visions that will ensure our children and grandchildren will also be safe. We appreciate a 30 year plan but seek to continue the development of our proposed changes by:
    - Promoting awareness that population growth does not equate to economic growth. Our resources are finite and wealth inequality only grows when economic growth is the goal.
    - We can repurpose/reclaim urban parks for local resilience food gardens
    - Service enquiry + prioritise lower socio-economic areas
    - Improve job security + access to mental health days
    - Prioritise biodiversity: councils must focus on planting trees and vegetation that are native and locally endemic because it isn't just about climate adaptation. It's also about reversing extinction by planting and retaining native species that support native wildlife. We need to ensure we have biodiversity and wildlife corridors as well as green spaces. No dolomite on verges.
    - Well implemented coastal management plans.
    - Concentration on restoration and rehabilitation of degraded ecosystems.

- ## Infrastructure and services

Public transport

- Investment into public transport, in particular trains, is needed to expand public transport networks into the hills and southern areas like Aldinga. This has been proposed but never achieved due to changes in government. Trains are key to a zero-emissions transport future as they can be run electrically, and also more easily accommodate things like wheelchairs, bikes and other accessibility factors. Trains also prevent further congestion, as well as using up less space than roads. High speed rail systems would increase buy-in from the public. Suggested routes include train lines connecting Happy Valley to the City and Eastern Suburbs (Norton Summit/Magill to City), and lateral connections between train lines (ie. Belair to Brighton, Henley to Magill)
- Make public transport free to increase accessibility and useability.
- In Mawson Lakes: close the road between the lake and businesses to make more room for foot traffic and tables for cafes. This will also increase safety & liveability in the area, and exposure for local businesses.
- Return the tram route of the 1930s (demonstrated in 1930s tram map).
- Ensure public transport leads to community locations, eg schools, shops, universities and other public services
- Better public transport to connect nodes that are planned to be built beyond/outside prime agricultural land
- Give trains priority over railway crossings, stop cars not trains
- Have later train services
- Have off peak train fares on weekday evenings and saturdays
- Incentivise bringing bikes on buses and trains - make space and eliminate extra costs for bikes to encourage greater use of existing public transport services and combining active transport options.
- More reliable buses that run on schedule
- Bike path infrastructure leading to public transport
- Invest in rail infrastructure first and then build towns around the stations
- Invest in more greenfield spaces as a priority for all new housing developments

- Make developers accountable for including green spaces and rail infrastructures in their plans.

Better active transport

- Increase the walkability of communities, to connect people with each other and the inner workings of their neighbourhoods (street libraries, verge gardens, meeting neighbours, discovering suburban businesses etc). More people walking will lead government to invest more in green spaces.
- Prioritise people not cars - walking, bikes, ebikes
- Invest in a city and hubs that are walk and bike friendly
- Make all street crossing raised for pedestrians and cyclists - they then act as a speed bump forcing cars to slow down and takes the onus off of pedestrians and cyclists to check before going down the ramp onto the road. These are known as raised road crossings and are effective in many parts of Europe. Pedestrian crossings should prioritise pedestrians, not cars, and they should be done with actual barriers to cars, not just paint.
- Ensure bike lanes leads to community locations, eg schools, shops and services. Replicate Frome Road Bikeway where cyclists are protected from traffic by a concrete barrier, instead of sandwiched against roads and needing to ride around parked cars (like on Greenhill Road). The Greenhill Road Bike Path puts cyclists at risk. Most of Adelaide's current bike paths are like this and must be changed. We also need more bike lanes to connect all of metropolitan Adelaide, to increase cyclist safety. Bike turning infrastructure at intersections would help with this also.
- Paint is not protection - road upgrades need to accommodate for safe cycling as part of the upgrade.
- Invest in secure, under cover, monitored bike parking to protect bikes.
- Ban cars from the CBD, providing people with viable alternatives (active transport and more efficient public transport)
- Increase the annual budget spent on active transport by 1000% in the first year and 10% each following year
- Cycling 'highways' should run parallel to all the rail plines, but in green corridors visually and audibly separated from cards

- The CBD and inner suburbs should be bike safe also. Key metric: Kid friendly bike KM's.

Less cars + higher % of Electric vehicles

- Make it easier to live without a car in Adelaide, and a nicer city to be in due to less cars!
- Safer for cyclists + pedestrians
- More EV chargers in city and wider range of suburban and regional locations (including fast chargers on transit routes) and better maintained (fast chargers are often broken)
- Bigger EV charging network
- EV chargers - ensure these are easily accessible in all areas
- Ensure access to micro-mobility eg. electric scooters & electric bikes
- On-street parking transformed into bike lanes
- Enforced cap on carparks.
- Review the laws that ban the use of single person electric vehicles. Currently all electric scooters, bikes, skateboards etc are not allowed in public spaces with the exception of peddle assisted bikes limited to 15kph. This restricts our capacity for electrified, active transport, which is key for a liveable zero emissions city.
- Remove all cars from Rundle street and Rundle road as a trial of car-free streets. We already do this during Fringe so the public will find it less radical. There are many alternative routes that can be taken around Rundle Street.
- Increase cost of on-street parking to cover cost of new bike infrastructure as well as deter parking in the city.

Reduce sprawl - better, healthier living.

- Invest in medium/high density living that is sustainably built with passive heating/cooling design principles
- We have great capacity to do urban infill well, but it has historically been done very badly, leading to negative community perceptions about infill.
- We should consider legislation which accommodates more flexible living arrangements.

- Increase the amount of infill development by 1000%
- Prioritise infill over greenfield development but also investigate ways to utilise existing built infrastructure/homes (don't build for the sake of jobs/economy)
- Have jobs that let us change our goals to sustain ourselves instead of an ever growing unsustainable mass.
- Give access to mental health support mechanisms, not just cut people off from income if they make mistakes at a job. Local governments should regularly consult and report on this issue.
- Increased medium density housing near railway stations
- Parkland space for all urban development
- Review zoning laws to allow for communal areas that are within walking distance from residential areas
- Flexible zoning to include social, economic, environmental activities in the same area - ie. community garden roofs
- Making urban spaces more green with trees to reduce urban heat island effect
- Prioritise medium-density infill + brownfield development
- Define a policy for 'block-level' developments that infill whilst increasing social outcomes such as greenspace, age and diversity + community building + walkability
- No more greenfield developments: We cannot afford any more clearing of native vegetation, or endless sprawl. Where we are stuck with already existing developments, we should focus on transforming them to be optimally liveable and sustainable cities.
- We need to lift the form of greenfield that we have. Many greenfield developments are becoming separate, isolated, car dependent and unlivable. We can take inspiration from liveable communities like Aldinga eco village which is a wonderful, walkable community with a shared economy. Through education and investment into concepts like the 15-minute city, we can improve our developments.
- Culture is critical. Whilst services like schools and employment are needed, it is arts and cultural precincts which make a place desirable to live and ultimately create liveable hubs, reducing the need for all dependance on the CBD.

- Reduce unusable green space such as golf courses and race courses which do not contribute to biodiversity and only appeal to the super wealthy top percentage.
- Green spaces need to be designed with people and biodiversity at the forefront. They should enhance cooling and done at scale to help us mitigate and adapt to the impacts of climate change.
- Green spaces do not need to be ‘low maintenance’ to be worthwhile. There are tightly held and outdated assumptions that green spaces should always be passive, and thus are designed poorly with the least amount of effort possible. They should be prioritised and recognised for their intrinsic services to nature, climate, and people. Communities should be engaged with the process. Active maintenance also provides necessary jobs and thus should be celebrated.

- Adelaide should grow up, not out: limit urban sprawl but ensure it is done with the best possible outcomes for people and nature, ensuring that trees and vegetation are retained.

Outcomes

- European style livable city design over American car-centric forms of urban development

- City planning orientated around a carbon-restrained future

- No new coal, oil or gas development.

- End homelessness and development of a precarious cost of living indicator to drive policy decisions.

- Turn inefficient and unused offices into affordable housing. Companies could hire out spaces they need to use only when they need them, enabling more time to spend with friends and family than in commuting.

- Establish urban growth boundaries.

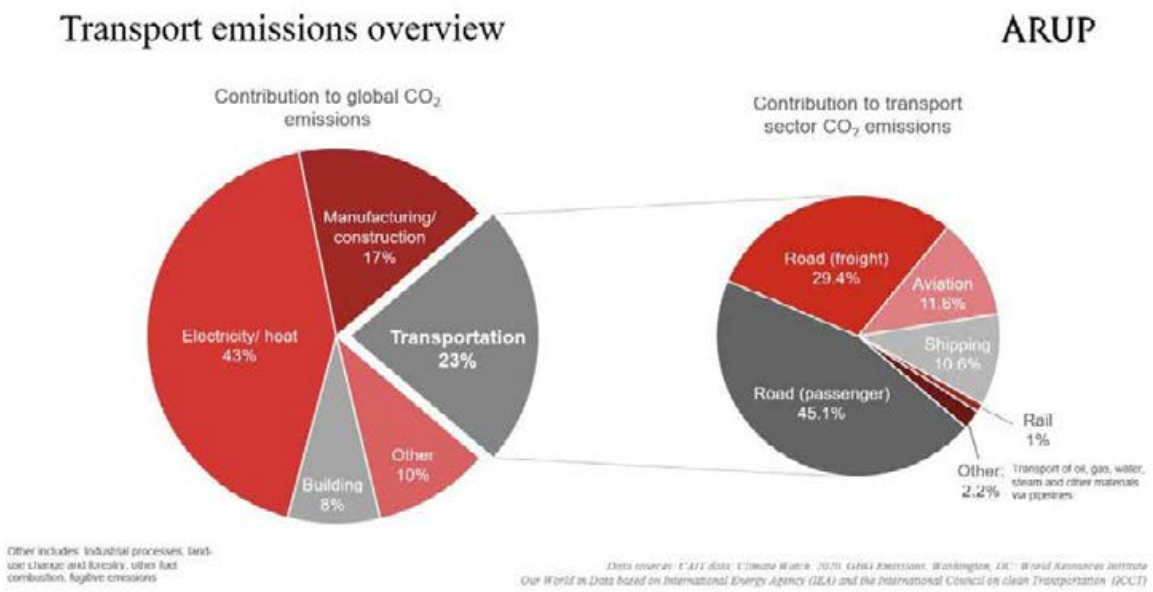
- Develop food security and local growing.

    - Enforce protection of prime agricultural lands on the urban fringe that are all at risk of being taken over by urban sprawl.

    - Protect agricultural land.
    - Have farming land interspersed with medium/high density housing.
    - Food gardening brings people together, improves health outcomes, and creates more resilient food systems when natural disasters destroy widescale crops elsewhere that would be otherwise relied on.
    - Have community gardens and kitchen in every suburb.

  - Build a biodiverse city which actively restores habitat and helps to enhance climate resilience.

Appendix 1:



From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:35:18 PM
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Please find attached our submission to the Greater Adelaide Regional Plan Discussion Paper.

If you have any questions, please feel free to contact me.

Regards
Mark Gishen
Project Manager – Environment & Technical
South Australian Wine Industry Association Incorporated
1st Floor Industry Offices, National Wine Centre, Botanic Road, Adelaide SA 5000

Part time: usually Monday, Tuesday and Friday
T: [redacted] | M: [redacted] | F: [redacted] | W: www.winesa.asn.au

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SOUTH AUSTRALIAN
WINE INDUSTRY
ASSOCIATION

Submission in response to the Greater Adelaide Regional Plan Discussion Paper

SUBMISSION OF:	SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION INCORPORATED
ABN:	43 807 200 928
ADDRESS:	First Floor, Industry Offices National Wine Centre Botanic Road ADELAIDE SA 5000
CONTACT PERSON:	Mark Gishen
POSITION:	Project Manager – Environment & Technical
TELEPHONE:	[redacted]
FACSIMILE:	[redacted]
EMAIL:	[redacted]
WEB:	www.winesa.asn.au
DATE:	6 November 2023

Submissions by 6 November 2023 to:
Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
Email: plansasubmissions@sa.gov.au

ABOUT THE SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION

The South Australian Wine Industry Association (SAWIA) is an industry association representing the interests of wine grape growers and wine producers throughout the state of South Australia.

SAWIA is a not-for-profit incorporated association, funded by voluntary member subscriptions, grants and fee for service activities. Our mission is to provide leadership, advice and support to South Australian grape and wine businesses, assisting them to prosper within a dynamic, diverse industry.

SAWIA membership represents approximately 96% of the winegrapes harvested in South Australia and about 40% of the vineyard area. Each major wine region within South Australia is represented on the board governing our activities.

SAWIA has a strong track record as an industry leader and innovator in many areas, and proactively represents members and the greater wine industry to government and related agencies on a wide variety of matters.

ABOUT THE SOUTH AUSTRALIAN WINE INDUSTRY

The South Australian wine industry is worth about $2.25 billion to the state's economy[1]. South Australia has 18 distinctly named wine regions with at least three having international recognition. South Australia is a premium wine state responsible for producing about 60% of Australia's wine production[2] (currently around 500 million litres of wine), and 80% of Australia's premium wine

South Australia has approximately 75,500 hectares under wine grapes[3], representing about 52% of Australia's vineyards, and comprise of 77% red and 23% white wine grape varieties. The total wine grape crush in 2023 in South Australia was 661,984 tonnes, 55% of Australia's crush. For South Australia, this was 14% below the 10-year average.

In the twelve months to the end of September 2023, South Australia exported 358 million litres for a value of $1.22 billion (about 70% of Australia's total value). South Australia's major export markets by value are currently Hong Kong, Singapore, UK, USA, Malaysia, New Zealand and Canada. Of international exports with a label claim from the regions of South Australia, about 70% are in bottled format, comprising over 90% of the value. Wine is currently South Australia's fourth largest single export sector. South Australian wine businesses export to about 100 countries.

In South Australia there are approximately 1,250 licensed[4] wine producers (including about 600 processing facilities, 340 cellar doors[5]) and 3,246 registered vineyard owners[6], who together directly employ around 8,990 persons[7] and indirectly support another 81,900 jobs[8].

Wine regions are a significant contributor to South Australia's tourism economy, which is currently worth around $814 million annually[9], with at least 39% of international visitors to South Australia spending time in wine regions.

[1] Primary Industries Scorecard 2021-22
[2] Wine Australia, Production, Sales and Inventory Report 2021-22
[3] SA Winegrape Crush Survey 2023, Wine Australia
[4] Consumer and Business Services SA
[5] The Australian and New Zealand Wine Industry Directory
[6] SA Winegrape Crush Survey 2023, Wine Australia
[7] Census 2021, Australian Bureau of Statistics
[8] Derived from Economic Contribution of the Australian Wine Sector 2019, AgEconPlus Wine Australia website
[9] South Australian Tourist Council (SATC) for the year ending March 2023

South Australian Wine Industry Association Incorporated
ABN 43 807 200 928
1st Floor Industry Offices, National Wine Centre, Botanic Road, Adelaide SA 5000
Tel: 61 8 8222 9277 Email: admin@winesa.asn.au Web: www.winesa.asn.au

SUBMISSION

The South Australian Wine Industry Association (SAWIA) is pleased to provide feedback to the Department for Trade and Investment (DTI) on the Greater Adelaide Regional Plan Discussion Paper (Discussion Paper). SAWIA notes that this Discussion Paper centres on "the features and characteristics that make the Greater Adelaide region so special" with a key feature being "our premium food and wine" (page 7 of the Discussion Paper), and that the term 'wine' is specifically mentioned several times.

1. Introduction

SAWIA has a strong interest in planning of the Greater Adelaide region because these regions contain some significant and critically important and high value wine producing regions. SAWIA has been engaged in previous consultations related to planning including the earlier 30-year Plan for Greater Adelaide (2009) and the Character Preservation Acts (2012) for the Barossa Valley and McLaren Vale regions.

2. Guiding principles for planning

SAWIA submits that planning in the Greater Adelaide regions should take into account at least the following principles and objectives:

- Ensuring the long-term protection and integrity of the areas identified as Environmental and Food Production Areas (EFPAs)
- Acknowledge and uphold the *Character Preservation (Barossa Valley) Act 2012* and *Character Preservation (McLaren Vale) Act 2012*
- Accepting that the financial and employment contribution of vineyards and wineries to the State is considerable and when wine and tourism are considered this will often far outweigh the apparent value of vineyard land
- Recognition of the 'right to farm' where new residents and new users of existing land understand they inhabit area within an agricultural land protection area where the viability and sustainability of agriculture importantly comes first
- Ensuring sound environmental requirements for all new development
- Identifying and maintaining the rural character and landscape of a region acknowledging it as a desirable place to live and providing an outstanding quality of life within world recognised wine regions
- Minimum sized land allotments and town infill will be the natural means of determining the population projections for a given agricultural land protection area
- Recognition that agriculture is the principal user of ground water with data collection and long-term monitoring required to ensure quantity and quality supplies of water remain available
- Development must allow for access to a sufficient quantity and quality of water and infrastructure to sustain community and wine industry pursuits
- Providing for a transparent and fair mechanism that provides appropriate checks and balances if existing protected land is to be considered for re-zoning.

3. Response to the Discussion Paper

SAWIA's responses to some of the specific matters raised by the Discussion Paper are outlined below.

Housing needs projections

The Discussion Paper presents a target for an increase of 300,000 homes in the Greater Adelaide region based on a population increase of 46% over the next 30 years (p. 14). Whilst a footnote

South Australian Wine Industry Association Incorporated
ABN 43 807 200 928
1st Floor Industry Offices, National Wine Centre, Botanic Road, Adelaide SA 5000
Tel: 61 8 8222 9277 Email: admin@winesa.asn.au Web: www.winesa.asn.au

indicates that this is "Based on 2021 Census data", we were unable to identify any further detail or explanation about how this figure was determined, nor what underlying assumptions may have been used if any. It is important to have a clear understanding of the likelihood of such growth for SAWIA to consider if the proposals that follow are appropriate. SAWIA suggests that this should be better explained in subsequent consultation on a draft Greater Adelaide Regional Plan in mid-2024.

Protection for Environment and Food Production Areas (EFPAs)

The Discussion Paper points out (p. 104) that "EFPAs protect our prime food and wine regions and natural resources from urban encroachment. EFPAs primarily preclude land division for residential development."

SAWIA is deeply concerned that the Discussion Paper then appears to open the possibility for those EFPAs to be developed through making variations to the EFPAs: "if a 15-year supply of urban land cannot be identified outside those areas." SAWIA suggests that this creates uncertainty for the community and the wine industry, which could be avoided by seeking to prioritise increase in density through infill as a first step. It is also unclear as to what the Commission defines in the plan as "smaller townships" (p. 103) and why only two specific places were mentioned – this requires further explanation to provide clarity.

A clearer statement about protection of EFPAs is required in the Plan.

Satellite city growth

SAWIA is aware that the current high demand for housing is already impacting the grape and wine production sector in terms of housing its workforce. Therefore, the focus on housing growth in satellite cities (Figure 9, p. 126) is broadly welcomed, as it offers the potential to provide housing in relative proximity to wineries and vineyards. However, it is important that planning should actively discourage any such growth that results in further encroachment on productive high value farming land, especially vineyards.

SAWIA is pleased that the Commission recognises the value of heritage and character areas and the necessary role of "greenbelts" to provide for "inter-urban breaks" (p. 103) and considers that this should be translated to increase infill development within the satellite cities rather than ongoing 'sprawl'.

Biosecurity

SAWIA is disappointed that 'biosecurity' has not been mentioned at all in the Discussion Paper and must be urgently addressed in further development of the planning for the Greater Adelaide region.

Urbanisation is a key challenge for the biosecurity of South Australia's vineyards. The CSIRO[10] has noted that "ongoing expansion of cities is changing interactions between people, wildlife, agriculture and disease vectors; potentially increasing risk of spreading pests and diseases across these boundaries. Fast growing peri-urban regions are also a source of new pest and disease risk as they are often under stewardship of inexperienced or under-engaged owners."

Breaches of biosecurity can have significant detrimental financial and social impacts on agricultural production systems and communities. It also places increasing resource demands on governments and their agencies for monitoring, enforcement and public awareness campaigns. It is therefore

[10] Australia's Biosecurity Future, 2020; accessed online 6 Nov 2023

South Australian Wine Industry Association Incorporated
ABN 43 807 200 928
1st Floor Industry Offices, National Wine Centre, Botanic Road, Adelaide SA 5000
Tel: 61 8 8222 9277 Email: admin@winesa.asn.au Web: www.winesa.asn.au

critical that this be considered when planning any population and housing growth in or near to high value agricultural activities.

Infrastructure

The Discussion Paper cites (p. 95) work that shows that "land development costs in urban and township extension areas can be significantly higher than land development costs in established residential areas", which suggests that increasing housing density in established areas is the most cost-efficient means of increasing housing. SAWIA understands that the Commission's work in this area is ongoing with Infrastructure SA (ISA) and it will be important to see all the supporting data and evidence that those works may bring once complete.

Further, increased population and development in satellite cities (as already discussed) will put greater pressure on the need for infrastructure improvements, especially roads. This will become especially important to service workers commuting to agricultural-based workplaces such as vineyards and wineries.

Next steps

SAWIA looks forward to involvement and engagement with the processes of the development of the plan. In the first instance, to receiving the 'What We Have Heard report and draft directions' arising from the consultation on the Discussion Paper, and secondly being involved with the activities planned for Stage 2 of the process.

Please feel free to contact SAWIA for further information or any questions regarding this submission and future consultations.

End of submission

South Australian Wine Industry Association Incorporated
ABN 43 807 200 928
1st Floor Industry Offices, National Wine Centre, Botanic Road, Adelaide SA 5000
Tel: 61 8 8222 9277 Email: admin@winesa.asn.au Web: www.winesa.asn.au

DTI:PlanSA Submissions

From: Elizabeth Rushbrook <[redacted]>
Sent: Sunday, 5 November 2023 10:34 AM
To: DTI:PlanSA Submissions
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: The Greater Adelaide Regional Plan Discussion Paper-Submitted 51123.pdf

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Dear Mr Holden
I am attaching SECRA's submission to the Greater Adelaide Regional Plan, which suggests that liveability should be a criterion for future SA development.

Kind Regards

Elizabeth
[redacted]

SECRA
SOUTH EAST CITY RESIDENTS ASSOCIATION

The Greater Adelaide Regional Plan Discussion Paper
The Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

Re: The Greater Adelaide Regional Plan Discussion Paper (GARP)

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper. Members of the South East City Residents Association (SECRA) committee have attended the Chair of the Planning Commission's presentations and read the discussion paper and summary. This response has been prepared with the assistance of a subcommittee drawn from members.

1. SECRA is an incorporated voluntary body with a membership of approximately 100 residents, which has the following objectives
    a. To promote the interests of the residents of the South-East Precinct of the City of Adelaide and adjoining areas.
    b. To preserve and enhance the inherent character and heritage of the neighbourhood, including the adjacent area of parklands and Victoria Park.
    c. To support the provision of local retail and service facilities whilst retaining the village atmosphere of Hutt Street.
    d. To determine the policy of the Association about matters affecting the South East Precinct.

OTHER INITIATIVES

2. At the same time GARP was released for comment, similar planning initiatives are being undertaken by other bodies, such as the City of Adelaide's *City Plan*[1] and Infrastructure SA's South Australia's *20-Year State Infrastructure Strategy Discussion Paper*.[2] These reports will likely impact and influence each other and will be hard to separate. Representatives from SECRA are likely to contribute to a response to these documents also.

[1] Refer to https://www.cityofadelaide.com.au/about-adelaide/city-plan/
[2] Refer to https://yoursay.sa.gov.au/state-infrastructure-strategy-url.

3. SECRA remains hopeful that the government response to the Expert Panel report will be released soon, addressing issues such as restoring third-party appeal rights and improving the opportunity for public notification and submissions for development applications.

CONTEXT

Growth estimates

4. SECRA understands that GARP is primarily concerned with land supply issues for housing and employment beyond the next 15 years when it runs out of sufficient land.[3] It replaces the existing 30-year plan for greater Adelaide, which was updated in 2017.[4]

   Underpinning the report is the view that Regional Adelaide will experience high population growth, with an additional 670,000 people and requiring 300,000 new homes by 2051.[5]

5. SECRA is not convinced that Adelaide will experience a high growth scenario based on our historically lower growth rates of around 1%.[6] However, rather than debate population growth figures some 30 years in advance, SECRA is willing to assume the estimated high growth rate provided in GARP. We recognise that population forecasting is problematic, given that it combines rapid changes (such as the impact of COVID-19) and more gradual changes (such as birth rates). Obviously, some elements are more predictable than others.[7] SECRA would prefer that the report contain scenarios for low, medium, and high growth rates to be of greater value in future planning.

GARP

6. SECRA notes that the report does not explicitly mention any impact on the City of Adelaide and future land supply. However, we wish to comment on several concepts and principles in the discussion paper pertinent to the South East Corner (SEC). The SEC is defined as Wakefield Road in the north, East Terrace in the east, South Terrace in the south and Pulteney Street in the West.[8]

7. We believe these are relevant to the broad issue of how to accommodate substantial population growth in the city in an era of global heating while preserving and hopefully enhancing liveability. For example, within Priorities and Directions, a Greener, Wilder and Climate-Resilient Environment, there was an aim to capitalise on growth in areas with existing open space networks

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[3] *Greater Adelaide Regional Plan Discussion Paper Summary,6.*
[4] The *30 Year Plan for Greater Adelaide* can be found at https://livingadelaide.sa.gov.au/.
[5] *Greater Adelaide Regional Plan Discussion Paper 14.*
[6] *Greater Adelaide Regional Plan Discussion Paper 14.*
[7] *Nicholas Eberstadt and Richard HaasIs Population Change a Problem? at*https://www.cfr.org/podcasts/is-population-change-a-problem
[8] See id (informed decisions), at https://forecast.id.com.au/adelaide/about-forecast-areas.

in the CBD, along river corridors and near major urban parks. As the south-east of the city is near Victoria Park, the largest urban park within the Adelaide Park Lands system, and Parks 15, 17 and 18 on its borders, this statement is relevant to SECRA.

INFORMED DECISION ESTIMATES

Growth

8. These estimates by Informed Decisions provide localised information. Regarding the SEC,[9] it shows that the population will grow by 43.14%, bringing an additional 1787 people to the area.

South East Corner (SEC)	Estimated population in 2023	4227
	Estimated population in 2041	6014
	Estimated growth	43.14%

9. Moreover, this growth is inconsistent throughout the SEC, meaning that any future growth in the SEC will be uneven throughout the area.[10]

Density

10. The SEC area has the highest density in Adelaide. By comparison, the City of Adelaide has an overall density of 1,679 persons per square kilometre. The SEC of the city has a population density of 5,085 people per square kilometre who mainly live in low-rise buildings. SECRA believes that this demonstrates that higher population densities do not necessarily mean high-rise buildings.

Historical Buildings

11. SECRA supports GARP in its support for the preservation and, in some cases, repurposing of historic residential and industrial buildings of architectural and heritage value and their gardens for future generations.[11] This requires changes to the current policies on demolition and heritage buildings. To this end, SECRA, in conjunction with the City of Adelaide, seeks to re-evaluate the 37 properties rejected by the Environmental Resource and Development Committee of the State Parliament in 2013 for local heritage listing when approving the City Centre Heritage Development Plan Amendment.[12]

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[9] Id (informed decisions), at https://forecast.id.com.au/adelaide/about-forecast-areas?WebID=140.
[10] Refer to Population Experience at https://experience.arcgis.com/experience/573f9c20fe0d44a2a43196633244ce43.
[11] See Adaptive Reuse prority, *Greater Adelaide Regional Plan Discussion Paper 59.*
[12] See letter from SECRA to the Minister for Planning, 13 March 2023.

Disadvantage

12. The SEC has a significant level of disadvantage as measured by the Socio-Economic Indexes for Areas.[13] Some areas in the SEC have a 960 index, below the 1002 average index recorded across the City of Adelaide, reflecting its higher levels of disadvantage. Therefore, our land use supports the Hutt Street Centre, Catherine House and related services, public housing, and other social justice initiatives within our community. SECRA welcomes this diversity within the SEC and notes that some new large developments along East Terrace are luxury apartments[14] housing relatively few people. In contrast, other significant developments, such as the Ergo apartments, offer a range of housing options to a greater number of people.[15]

RESPONSE TO A GROWTH AGENDA

13. SECRA sees the SEC as a distinct area from the CBD area, forming one of the four urban villages in the City of Adelaide. Should this level of growth eventuate, SECRA would want it to retain its 'urban village' atmosphere.-In this regard, the SEC may usefully exemplify a mix of housing types, living locally and liveability, that may have been lost in many significant developments.

14. GARP suggests that four outcomes should underpin future development. SECRA supports these outcomes. They are

    a. A greener, wilder, and climate-resilient environment
    b. A greater choice of housing in the right places
    c. A strong economy built on a smarter, cleaner, regenerative future
    d. A more equitable and socially - cohesive place.[16]

    SECRA has worked with others to progress some of these aims and looks to continue this role. While these outcomes are relevant to the future, they also underpin current land use.

15. As an example, SECRA already implements elements of the first objective, 'A greener, wilder and climate-resilient environment,' as outlined below:
    a. Initiating a volunteer group, Green Pakapakanthi, to assist in providing tree canopy to Victoria Park/Pakapakanthi users.

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[13] The City of Adelaide Socio-Economic Indexes for Areas (SEIFA) measu The Environment, Resources and Development Committee of State Parliament reviewed the DPA in April and May 2013 and allowed the DPA to proceed with no changes. This means the DPA is finished with the outcome that 37 of the proposed 78 buildings were local heritage listed. A illustrated report of the 41 buildings is below. re the relative level of socio-economic disadvantage and/or advantage based on a range of Census characteristics

[14] See 'Eye-popping penthouse' in *The Advertiser*, Tuesday October 10 2023.

[15] See https://axiomgroup.com.au/projects/ergo-apartments.

[16] *Greater Adelaide Regional Plan Discussion Paper Summary,9.*

b. Applying a citizen science approach to the development of new ways to develop understory in Victoria Park, which could be implemented in other urban parks.
c. Responding to the effects of climate change and the impact on the liveability of SE residents, such as the effect of Adelaide 500.
d. Working with the Transport Action Network to develop an integrated public transport system by holding public forums.
e. Advocating for active transport users, whether they walk, cycle, use mobility aids or have young families, in various forums, including the Lord Mayor's Hutt Street Roundtable.
f. Advocating for liveability through taking up issues of importance to our members, including removing catalyst sites.

16. SECRA also supports the acknowledgement of the impact of climate change,[17] noting that it 'impacts all areas of our society.'[18] A significant contributor to climate change is the greenhouse gases emitted by cars.[19] We are particularly concerned about the dominance of vehicles in our community and support active transport, such as people who walk, bike, or use public transport. SECRA notes that when residents move into the city, their car ownership lowers. Some 14% of the City of Adelaide residents[20] work or study outside of Adelaide, and only half of the residents in Adelaide now have a car[21], decreasing greenhouse gas emissions.

17. Despite this pattern of the use of cars by residents, there are difficulties in obtaining visitor car parks and finding accommodation with sufficient car parks. This is a significant challenge for the City of Adelaide, which relies on car parking for much of its revenue. The Commission may wish to work with the City of Adelaide to implement a range of policies to reduce the number of cars in the city and enhance liveability as the population grows.

18. SECRA is aware that governments are hard-pressed to maintain and upgrade infrastructure for our current population increase. It would, therefore, be hard to envisage how we could provide infrastructure growth to sustain higher annual population growth in greenfield sites, for instance. Thus, while the cost of such assumptions is contestable, infill and city

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[17] The United Nations 'Climate change refers to long-term shifts in temperatures and weather patterns. Such shifts can be natural, due to changes in the sun's activity or large volcanic eruptions. But since the 1800s, human activities have been the main driver of climate change, primarily due to the burning of fossil fuels like coal, oil and gas' at https://www.un.org/en/climatechange/what-is-climate-change.
[18] *Greater Adelaide Regional Plan Discussion Paper, 42.*
[19] UN, *What is climate Change*? https://www.un.org/en/climatechange/what-is-climate-change.
[20] *Adelaide City Living Market Research Vol 3 Adelaide City Residents,18.*
[21] *Adelaide City Living Market Research Vol 3 Adelaide City Residents,41.*

development become particularly attractive. SECRA is working with other groups with a proposal to improve public transport connectivity within regional Adelaide. A joint submission to the revised 20-Year State Infrastructure Strategy may further this initiative.

19. SECRA strongly advocates for the Adelaide Park Lands system, which provides green open space to the SEC on the east and southern boundaries. The parklands improve residents' health and provide both environmental and economic benefits. [22]

LIVING LOCALLY

20. One set of objectives that SECRA supports is living locally.[23] SECRA is 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.

    Looking at some of the nuances, when residents decide to live in the city, they value the ease of walking around, many parks, trees and tree-lined streets, cafes, chemists and other services, along with being safe and secure. What they disliked about living in the city was the noise and lack of car parking.[24]

    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.[25]

LIVEABILITY INDEX

21. SECRA 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.

22. 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. An example is below, where residents may have differing views on ranking various elements of a liveability index. [26]

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[22] City Park Alliance, *City Parks Are a Smart Investment for America's Health, Economy, & Environment at* https://cityparksalliance.org/wp-content/uploads/2022/05/CPA_3-Infographics_2022.FINAL_.pdf
[23] *Greater Adelaide Regional Plan Discussion Paper Summary,15.*
[24] *Adelaide City Living Market Research Vol 3 Adelaide City Residents*, Executive Summary, 3.
[25] Ibid, 4.
[26] *Understanding Liveability to Advance Quality of Life – Important Considerations*, id (informed decisions).

Attributes of liveability that the SEC is likely to meet	Uncertain if the SEC meets these attributes	The SEC may not meet these attributes
High-quality health services	Affordable, decent housing	Affordable, decent housing
Access to the natural environment	Prosperous economy	Opportunity for all
Strong sense of community	Reliable and efficient public transport	Social cohesion
Cultural facilities	Good job prospects	
Ability to view and participate in sports and recreation	Lack of road congestion	
High-quality educational facilities	Travel to services easily	
A diverse range of shopping, leisure, and dining experiences		

23. Considering the interaction of these elements, SECRA 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. 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.

24. SECRA prefers a resident-centric approach rather than a place-based approach to local planning, which is essential to retain the high level of liveability in the SEC and may be successfully attained in low to medium-rise residences. [27] The missing component, though, 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

[27] ABS classifies apartments in the following way - low rise (1 to 3 storeys); medium rise (4 to 8 storeys); high rise (9 to 19 storeys); and super high rise (20 or more storeys) at https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/8752.0Feature+Article1Dec%202018.

process, which can move towards co-planning in areas such as the SEC to achieve the desired increase in population in this wonderful part of the city.

CONCLUSION

25. The government sector's need for credible, genuinely representative insight has never been greater. Residents, other levels of government and even the private sector are placing higher expectations on governments to ensure that their community's views are more comprehensively incorporated, monitored, and ultimately evaluated in government strategic planning and advocacy.

    However, SECRA is concerned that a doubling in growth in the SEC may not be achieved without unacceptable detriment to liveability, the environment, heritage, and amenities of the area. Therefore, SECRA's response to the question of where the growth should go in the SEC is that it depends upon the retention or improvement of the liveability of our residents.

SECRA is willing to discuss these ideas further with the Commission. First, could you please contact Elizabeth Rushbrook by email at [redacted].

Yours sincerely

[redacted]

Doug McEvoy AM

Chair
SECRA

Date: 4 November 2023.

DTI:PlanSA Submissions

From: ST PETERS RESIDENTS ASSOCIATION <[redacted]>
Sent: Monday, 6 November 2023 2:12 PM
To: DTI:PlanSA Submissions
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater Adelaide Regional Plan SPRA submission.pdf

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ST PETERS RESIDENTS ASSOCIATION INC.

E-mail info@stpeters.asn.au
Representing the Residents of St Peters, College Park, Hackney, Stepney, Maylands, Evandale & Joslin.

Please find attached the St Peters Residents Association submission on the Greater Adelaide Regional Plan Discussion Paper.

David Cree
President

****

St Peters Residents Association Inc
info@stpeters.asn.au
****

ST PETERS RESIDENTS ASSOCIATION INC.

E-mail : info@stpeters.asn.au ABN 86 794 177 385

Representing the Residents of St Peters, College Park, Hackney, Stepney, Maylands, Evandale & Joslin.

SUBMISSION TO GREATER ADELAIDE REGIONAL PLAN (GARP)

General Comments

The St Peters Residents Association (SPRA) notes that immigration is running at a very high level, with Australia leading the world in its rate of immigration-induced population growth. An extra half a million people were added in the past 12 months. This is putting enormous pressures on our cities and housing supply with soaring rates of homelessness and people unable to find rental accommodation. While we understand that the State Planning Commission (SPC) has no control over our population growth, we submit that as the State's key land use planning body, it has a responsibility to report to the State Government on community concern over large pressures on our land supply and housing needs.

We appreciate that household formation rate, as well as population growth, impacts on demand for new housing. However, community concern over population growth cannot forever be swept under the carpet. The forecasted need for an extra 300,000 dwellings in the Greater Adelaide region over the next 30 years demonstrates a need for a major increase in our current housing stock. Extra housing will be traded off against residential amenity, the natural environment, open space, agricultural land and the tourism attractions of this State. Politicians may think endless population growth is a good thing, and that you can maintain an ever-growing population while achieving a better environment, but public servants and members of Planning Commissions have a duty to remind them of reality and the costs which non-stop population growth brings.

The Discussion Paper suggests we plan to accommodate a high population growth projection of 670,000 for Greater Adelaide by 2051. However, a median growth projection of about 500,000 may be more plausible. Undue pressure may be placed on agricultural land, employment lands, the environment and open space by planning for the highest population growth projection.

SPRA is pleased that the SPC is proposing to spread the burden of extra new dwellings which may be needed in this State over the next 30 years. Spreading the load between infill housing, some greenfield site development and satellite cities is a good thing. However, we note that although the targeted burden falling on the existing suburbs for new infill has fallen from 85 per cent of new housing to 70 per cent, this is still a high proportion of the new housing to be built.

We support more emphasis on selecting sites for Strategic Infill rather than piece-meal, ad hoc infill. We value the Discussion Paper's recognition of the importance of protecting historic

and character residential areas. It is important that infill housing does not undermine the valued character of these areas.

SPRA submits that before any more land is re-zoned in the Norwood Payneham and St. Peters Council area, land that is already zoned to allow multi-storey infill apartments should be used up. This land includes the southern side of North Terrace Kent Town and The Parade Norwood, as well as parts of Kent Town. Post-war suburbs in the Payneham/Firle areas also allow for up to three storey residential development which has generally resulted in two storey development. Multi-storey housing developments on The Parade should adhere to height limits in the Planning and Design Code as High Streets like The Parade require sensitive development which does not overwhelm the human-scale street level shopping precinct which attracts many visitors and tourists.

We understand that three types of infill, and sites suitable for them, are to be investigated by the Commission. These are **Strategic Infill, Corridor Growth and Neighbourhood/Centre Infill**.

Areas denoted for possible **Strategic Infill** Sites include the Stepney Triangle, a light industrial area containing a few remnant 19th century cottages, many businesses and two three storey apartment blocks. Now classed as an Employment Zone, the Stepney Triangle supports a range of food and beverage manufacturing businesses which have increased in number in recent years. These businesses are likely to be forced out of the area if it is re-classified to a Strategic Infill site.

Areas to be investigated for possible **Neighbourhood/Centre Infill** include land formerly used by the Department of Transport for a carpark next to the River Torrens and adjacent to the River Torrens Linear Park. This land, off Holton Court St Peters, is in an area rich in urban wildlife (including koalas). The Norwood Payneham & St Peters Council has approached the government in the past with a view to adding this land to the open space next to the Torrens River. A large infill apartment complex on this sensitive riverine site has the potential to add a great deal of pollution to the river and to decimate the local environment and its wildlife. We also understand that the former Department of Transport carpark is built on fill, due to the history of sand and gravel mining along the River Torrens, followed by its use as a rubbish dump. This land should be added to the Linear Park and MOSS.

The Caravan Park on Richmond Street has also been suggested as a site for Neighbourhood/Centre Infill investigation. An error has been made in the mapping of this site. The detailed Commission map shows the area includes the adjacent Twelftree Reserve, a public park owned by Norwood Payneham & St Peters Council. This should be corrected.

The Caravan Park site was zoned for multi storey redevelopment under former Planning Minister John Rau. Caution should be exercised in approving multi-storey residential development on this site, particularly towards the river cliff face at the rear of the site. These cliffs are not stable, and any housing development should be set well back from the cliff face. In nature, cliffs erode due to wind, rain and earth movements and it may not be wise to try to pin them down in the one place with overly enthusiastic large housing developments.
However, there should be provision made for the continuation of the Linear Park walking / cycling track along the riverbank behind the caravan park. The lack a track requires walkers and cyclists to cross the river or to negotiate the narrow Richmond Street in Hackney.

In relation to **Neighbourhood Infill**, we urge the Commission to tighten up controls on so-called "normal" infill, as this is uncoordinated and ad hoc, which often inflicts significant amenity and environmental costs on neighbours and local areas. These costs are outlined later in this submission.

Corridor growth infill on arterial roads to be investigated include all of Payneham Road, Magill Road and Kensington Road. We submit that these roads adjoin many Historic Overlay and Character Overlay Areas that are full of historic and character garden suburbs with predominantly single storey dwellings set in relatively spacious gardens. With properties fronting these main roads being largely single allotments there will not be enough space, in many cases, for multi-storey apartment dwellings to be erected.

Proposed areas of investigation for **"Mass Transit"** include Magill Road, The Parade and Kensington Road. These roads are congested at peak periods. It is not clear what "mass transit" involves.

This Discussion Paper should be integrated with the recently released Infrastructure Plan, as well as with a Transport Plan. Coordinating the provision of infrastructure with land use planning is critical.

We submit that local councils should be involved in the scoping for detailed investigations into future housing development land. Local knowledge and support are important. Good design principles for new housing are also important and should be included in the Planning and Design Code.

Questions from the GARP Summary Paper

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

- A range of dwelling accommodation types including detached dwellings, row housing and low-rise (3-4 storey) apartments is desirable but please don't stack 10-12 storey flats on to greenfield sites. Good design is important.
- There is a need to attract commercial activity without detracting from residential amenity. You need a good economic base otherwise you will have to admit that the Living Locally is a pie-in-the-sky ideal.
- Needed will be land for public open space so that good parks, lakes and local sports and entertainment support Living Locally and reduce the need for residents and workers to travel long distances.
- Reliable public transport is essential.

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

- A variety of housing types in different areas.
- Historic and character areas to be protected.
- Substantial street trees and parks are a must.
- Better public transport.
- Row housing, along with detached housing, semi-detached dwellings and low-rise apartments.
- The historic character of these towns must be protected to support the tourism industry and the preferences of residents.
- Don't built 10 storey blocks of flats in them.
- Good design will be essential for new housing.

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

Potential benefits:

- Greenfield development will provide detached houses (hopefully with gardens and trees) for families to live in (children can play safely in rear gardens without adult supervision).
- Detached dwellings are most popular for people raising children.
- More choice of housing types and site areas (hopefully not all tiny allotments with cheek-by-jowl housing).
- Cheaper (in the short-term)

Potential drawbacks:

- Poor quality design.
- Small allotments and dwellings crammed together with little room for trees or gardens and little space for street trees.

- Loss of mature trees and wildlife as trees are cut down to make way for new development. Every effort should be made to retain established trees and to develop around them.
- Loss of agricultural land.
- Greater distances to travel to work and shopping if few job opportunities are available and local shopping choices are restricted.
- Need for more infrastructure including public transport, child care, schools, medical facilities, roads, water, sewerage, electricity, street trees.
- Perhaps more social isolation until strong sense of local community developed (a big role for local councils).
- Loss of character of small towns if greenfield development result in what is termed "sprawl" and small towns are linked up becoming one big urban conglomeration.
- Should be green belts between small towns and these should be protected from residential development.
- The British manage to protect their small towns with green belts so we should learn from overseas experience.

Where is the next generation of strategic infill sites?

- There are many former light industrial areas in the western suburbs and some of these should be suitable for Strategic Infill development.
- Examples include the former Coca Cola site, Bowden-Brompton and parts of Port Adelaide.
- The Elizabeth Shopping Centre has been suggested too as suitable for a major Centre infill re-development.

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

- Strategic infill is more desirable than piece-meal infill as it is better planned and designed and may have more government oversight over it.
- Can live and shop and even recreate locally but needs to be near centres of economic activity (Even Bowden-Brompton residents probably have to leave the site to go to work)

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

Potential benefits: **Ad hoc infill**:

- More dwellings

Potential drawbacks: **Ad hoc infill**:

- Loss of trees, loss of gardens, loss of open space, loss of urban wildlife (birds, possums, lizards etc.), hotter microclimates in summer, more noise (especially from backyard (hammerhead, battle-axe development), more conflict between neighbours
- More cars parked on streets and less parking available for visitors and tradesmen, more driveways across footpaths and less space available for street trees,

- Extra load on existing infrastructure (water, electricity, roads) .
- Extra stormwater for councils to dispose of means they will have to invest huge sums of money (usually borrowed) into laying bigger water pipes underground.
- May be poorly designed.

Potential benefits: Strategic Infill:

- More dwellings, more coherent in style, well planned.
- Stormwater usually recycled.
- Better landscaping and open space provided.

Potential drawbacks: Strategic infill:

- May require heavy government subsidies (eg Bowden-Brompton).
- May be relatively isolated from surrounding neighbourhood, extra loneliness of the older apartment-dweller.
- Needs to be well integrated with transport and infrastructure planning.
- If imposed from on high may not be popular in a local community.
- Need to negotiate with local community, where possible.

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

- Population growth and distribution
- Work from home trend
- Type of industry/commercial development doing well/diminishing
- Transport networks.

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

- Population growth and size
- Climate change (urban heat island effect when vegetation is replaced with buildings)
- Demographics
- Changing technologies
- Rate and amount of housing densification
- Urban biodiversity needs (noting that biodiversity is in decline across Australia).

DTI:PlanSA Submissions

From: Ben Sarre [redacted]
Sent: Wednesday, 1 November 2023 3:31 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: 231101 Submission to Greater Adelaide Regional Plan - The Cottage Homes Inc.pdf

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

Please find attached The Cottage Homes' submission regarding the Greater Adelaide Regional Plan Discussion Paper.

BEN SARRE
Executive Officer
[redacted]
cottagehomes.org.au

This email may contain confidential information, which also may be legally privileged. Only the intended recipient(s) may access, use, distribute or copy this email. If this email is received in error, please inform the sender by return email and delete the original. If there are doubts about the validity of this message, please contact The Cottage Homes Inc immediately by telephone. It is the recipient's responsibility to check the email and any attached files for viruses.
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1st November 2023

Attention: Growth Management Team, Planning and Land Use Services
Via Email: plansasubmissions@sa.gov.au

To the Growth Management Team

Re: Submission – Greater Adelaide Regional Plan Discussion Paper

Established in 1872, independent social housing provider, The Cottage Homes Inc is pleased to provide feedback on the Greater Adelaide Regional Plan Discussion Paper. The views expressed in this submission reflect the views of the Board of The Cottage Homes Inc (TCHI).

Background

- TCHI provides social rental housing to older persons on the Age Pension. As such, the views in this submission relate to planning for affordable housing for older people.
- TCHI owns 129 single bedroom units, located on 7 sites across metropolitan Adelaide. This submission relates to TCHI's experience in metropolitan Adelaide.
- All of TCHI's residents are eligible for the Age Pension. As such, this submission relates to low (fixed) income households.
- The average age of TCHI residents at the time of entry is 71 years. TCHI residents range in age from 68 to 96 (ave age 80 years). This submission relates to older people.
- At the time of this submission, TCHI's 129 units were occupied by 126 single people and 3 couples. As such, this submission primarily relates to single person households.
- Over the past 5 years, TCHI 'turns over' 10 units each year (on average).
- TCHI is not a registered Community Housing Provider. TCHI is not an aged care provider or retirement village operator.
- TCHI is a registered charity and not for profit, independent housing provider.

Availability of Affordable Rental Housing Relative to Older People

- TCHI does not widely promote its housing services. Despite this, TCHI has a waiting list equivalent to 8 – 10 years of available units (based on 10 vacancies per year).
- In the past 12 months, TCHI received over 100 enquiries from eligible older persons seeking affordable rental accommodation.
- An increasing number of enquiries are coming from older people who have a long and excellent rental history in the private market. Weekly rent charges have been escalating to a point where it is no longer affordable for older people on the Age Pension, and they are 'forced' to move out and seek cheaper housing.
- An increasing number of enquiries are coming from older people who, at the time of enquiring, are living with an elderly sibling, adult child, or elderly friend or relative. This is often reported as placing stress on the older person, and the person/family providing them with temporary accommodation.

In summary, more affordable rental housing is required for older, low-income people and this housing needs to respond to single person households in a way that socially connects them in good locations within walking distance of shops and services.

Outcomes for the Greater Adelaide Regional Plan (GARP)
The GARP Discussion Paper clearly identifies several demographic factors which emphasise the importance of planning for housing for older people. These include:

- Nearly 20% of the population are aged 65+ years.
- 75% of the housing stock is detached dwellings.
- 78% increase in single person households (a typical household type for older people)
- 52% increase in couples with no children (a typical household type for older people)

HOW should Greater Adelaide grow?
TCHI notes that two of four outcomes of the GARP speak directly to the need for housing:

1. A more equitable and socially cohesive place; and
2. A greater choice of housing in the right places

As stated in the GARP Discussion Paper, both of these outcomes have shared trends and drivers, notably:

- Housing availability and affordability
- Liveability
- Social inequality

Feedback from TCHI residents indicates the following:

- Social isolation for older people can be challenging. TCHI provides housing in 'community' settings of between 10 and 27 units which helps address isolation and builds community amongst residents.
- Safety and security for older people is important. Living in small communities of older people (all TCHI residents are at least 65 years of age) in a similar stage of life can offer peace of mind for residents.
- TCHI units are single bedroom, and typically between $50m^2$ – $55m^2$ in floor area. The units are of a size that is manageable for an older person to maintain.
- TCHI communities are in 'garden settings' enabling residents to maintain their garden if they wish (contract gardeners are also engaged to maintain grounds). The opportunity to work in their garden is important for residents' physical and mental wellbeing.
- Easy access to relevant services and facilities is important, such as health, medical, shopping, community, and dining. Being within a short drive, public transport ride or walk is crucial for older people's ability to access these much-needed services.

The option of well-located, easy to maintain units, grouped together in garden settings, and offered at an affordable rent, is important for older people on the Age Pension. TCHI understand that this type of housing option is not widely available in metropolitan Adelaide.

This speaks directly to the concept of Living Locally as expressed in the GARP Discussion Paper. The future urban form for metropolitan Adelaide must be one where older, low-income people are housed affordably and suitability in community settings which facilitate their connection to people and key services. The Living Locally principles of affordable living, housing choices for all stages of life, public transport options, sense of community, walkability and safe streets and spaces are critical for older people on low incomes.

We note the recent attention to 'granny flats' as an alternative to increasing the supply of affordable rental accommodation in established urban areas. Granny flats are a valuable form of housing; however they can be isolating and our experience is that older residents prefer to live in a community setting to encourage interaction, reduce loneliness and create interdependency for mutual benefit.

***WHERE* should Greater Adelaide grow?**
To provide the quantum of housing that Greater Adelaide needs to cater for future demand, new housing must be delivered in both greenfield and urban infill areas. All growth, whether greenfield or urban infill, needs to consider the housing needs of low-income older people.

TCHI believes that specific planning consideration must be given in order to ensure the adequate provision of suitable affordable housing for low-income older people. Specific planning considerations are summarized in the table below:

Alternative	**Change Required / Government Assistance**
Strategic infill sites	Selected sites which cater for a minimum of 10 dwellings, be identified and 'protected' by planning requirements, to deliver affordable rental housing for older people.
Co-Housing and Co-located Housing	Changes to planning code to permit multiple independent occupancies within established housing zones. Secured via Land Management Agreements to prevent leakage to non-vulnerable tenants with higher impacts on local amenity (noise, parking, etc.). Co-Housing for older people is an effective in-fill development strategy, leveraging established infrastructure and services, while maintaining existing streetscapes.
Redevelopment	Codify car parking discounts, and other planning concessions for aged accommodation providers. Codify established higher densities flowing to adjacent sites purchased to amalgamate with established sites held by providers such as TCHI with charters and/or Land Management Agreements that "lock in" tenant profiles and land use.
Smaller dwellings in well-serviced locations	Changes to the planning code to enable smaller units to be constructed in well-located urban areas, close to shops, services and transport options, throughout metropolitan Adelaide.
Land-leases	Establish clear and viable planning frameworks and zoning for land lease communities for aged cohorts (over 55s) as in other states.
Greenfield developments	Masterplanning for greenfield land releases to incorporate specifically identified and protected development sites, to deliver affordable rental housing for low-income older people, as long as this does not lead to car dependency. Identified sites would need to be well-located to planned or existing infrastructure and services.

The Cottage Homes recognises the current record low rental vacancy rates would best be remedied by the creation of additional rental stock. Therefore, we strongly urge the Greater Adelaide Regional Plan to focus its attention on new approaches that facilitate higher stock levels, via increased density or occupancy on established sites through redevelopment, or via the construction of new stock on vacant or underutilised land.

Kind regards

[redacted]

Ben Sarre, Executive Officer
On behalf of the Board of The Cottage Homes Inc.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 4:21 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater-Adelaide-Regional-Plan-Submission.docx

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Other
Given name:	Shannon
Family name:	Evenden
Organisation:	The Environment Institute at the University of Adelaide
Email address:	[redacted]
Phone number:	[redacted]
Comments:	This submission is on behalf of a collaboration between the Healthy Environments and Lives (HEAL) Network, Environment Institute at the University of Adelaide, Dynamic State and UN Youth South Australia. Workshop discussions were strongly aligned wth the Commissioner's "Living Locally" ambition, with recognition that this aim requires the provision of all services including recreation, health, and greenspace in the immediate locality of new residential developments. Comments are detailed in document titled "Greater Adelaide Regional Plan Submission". They follow and represent discussions from a two-day workshop on Quality Urban Greenspaces with an interdisciplinary group of over 30 experts across academia, local and State government, and industry.
Attachment 1:	Greater-Adelaide-Regional-Plan-Submission.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 21.2 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

Greater Adelaide Regional Plan Submission

A collaboration of the Healthy Environments and Lives (HEAL) Network, Environment Institute at the University of Adelaide, Dynamic State and UN Youth South Australia.

Submission Background

This submission follows and represents discussions from a two-day workshop on Quality Urban Greenspaces held by the Healthy Environments and Lives (HEAL) Network, the Environment Institute at the University of Adelaide, and Dynamic State.

The workshops brought together an interdisciplinary group of over 30 experts across academia, local and State government, and industry. Areas of expertise included health and medical science, public health, architecture and urban design, environmental sciences.

Focus of this submission

The focus of this submission will be the provision of quality urban greenspaces, with "quality" defined in the workshops as "*vibrant, equitable, multifunctional and climate resilient urban greenspaces that supports human and ecosystem health*".

While workshop discussions were strongly aligned with the "greener, wilder, and more climate resilient environment" guiding outcome for Greater Adelaide's growth and the biodiversity priority, they also touch on processes such as greenfield and infill development, and priorities and outcomes such as social inequity and climate change. The breadth of relevance highlights the interconnectivity of urban greenspaces function.

This submission addresses areas as they were isolated within the GARP discussion paper; however, attempts to demonstrate the connection across areas.

Part 1 "How will Greater Adelaide grow", Outcome "A greener, wilder and climate resilient environment"

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

See below for detailed suggestions, based on discussions at the two-part Quality Urban Greenspaces workshop.

Trend/Driver: Climate impacts and biodiversity loss

What could the planning system do	Ideas for the GARP
Monitor and evaluate urban tree canopy coverage and distribution of quality urban greenspaces.	"**Continue to map the tree canopy to identify urban greening priorities and establish new targets that are annually benchmarked and reported on**" (pg. 55). Additional points to that described in the GARP Discussion paper discussed at the workshop include:

	● Overlaying tree canopy coverage mapping with elements such as socio-economic index and tree species diversity in order to develop a clearer picture of the current state and required action. ● The health benefits of access to greenspace, and challenges with inequitable distribution across socioeconomic demographics
	Report on the quality, function and availability of urban greenspaces across Greater Adelaide ● Evaluate current use of and need for new standardised tools and metrics to report on quality and use of urban greenspaces ● Encourage standardised measurement and reporting of urban greenspaces throughout Greater Adelaide
Improve, evaluate and/or modify standards and regulations regarding urban tree canopy.	**Improve Greater Adelaide-wide standards and regulations for tree establishment, management and removal** Recommended standards and regulations discussed during the workshops include: ● Minimum maturity for street trees in new and existing developments ● Management strategies with respect to overhead powerlines ● The protection of areas available for large trees to be planted on nature strips ● Species priority and species diversity (see below)
	Evaluate and modify standards and regulations to ensure resilience for future climates and reduce risk of biodiversity threats. ● The workshop discussions noted the increased risk to existing canopy with increasingly common, and lengthy drought events caused by climate change. It was suggested that a strict adherence to historically native species may not be optimal, and proactive planting of semi-arid species should be prioritised. ● Additionally, in order ro reduce the risk of biosecurity threats an increased diversity of trees should be planted within new developments.
Promote an urban environment that maximises the use of limited space	**Improve on the quality of existing greenspace and transport corridors** The workshop participants recognised a competition for landuse, and challenges of working within previously built environments that did not prioritise available public greenspace. As such, there is a need to harness and improve on existing greenspaces and transport corridors.

	● Repurposing extensive grass-dominated greenspaces to provide multi-functional benefits to human and ecosystem health
	Increase the creation of greenspace within otherwise unusable space. ● For example, planting on verges, edges of bikeways, and spaces between buildings

Trend/Driver: Changing mobility systems

A key limitation to the development of quality urban greenspaces and tree coverage discussed at the workshops was the space available in established infrastructure and in development projects.

A potential solution discussed is aligned with changing mobility systems through redefining streetscapes. Redefining streetscapes, both in residential streetscapes and metropolitan Adelaide, away from car-centric use and towards public and active transport opens up space otherwise used by cars for increased tree coverage and greenspace.

What could the planning system do	Ideas for the GARP
"**Promote an urban form that encourages greater use of active transport options, such as walking, cycling and public transport**" (pg. 54) and disencourage the use of cars.	**Facilitate active and public transport use in residential streetscapes and disencourage the use of cars** (aligned with Figure 2 of the Discussion Paper). Ideas included: ● Undertake analysis of changes in patterns of traffic and car-use where car capacity may be constricted, or alternative transit instituted. ● Increase access to public transport and active transport infrastructure throughout suburban and residential streetscapes ● Reduce suburban speed limit to 30km/hr. Workshop participants noted lower speed limits in conjunction with "shared streets" designation has increased pedestrian safety, changed design philosophies to accommodate alternative transport modes of transport (e.g., cycling, walking) and allows for greater planting on residential streets within current road-safety design policies. ● Redesign residential streetspaces, for example, reduce width of residential and suburban streets, and utilise extra space for trees and vegetation.

	This approach touches on numerous priorities and outcomes including improved overall public amenity in suburbs, social wellbeing, biodiversity and climate mitigation.
	Reduce the role and priority of cars within the Adelaide metropolitan area. ● Following in the footsteps of cities such as Amsterdam and London, and transitioning away from the use of cars within the CBD. ● By reducing the use of cars in the city, more space is opened up for built, social and green infrastructure.

Suggested Additional Trend/Driver: Community connection, capacity and engagement.

Complete communities are identified in the GARP Discussion Paper as a “Complementary approach” to climate change i.e., a “planning system [that] might promote urban greening which stores greenhouse gas emissions while also helping us to adapt by cooling our suburbs as average temperatures rise” (pg. 42). However, there are no specific planning systems or ideas to build connection, capacity and engagement within community. Discussions during the workshops strongly suggest the need to create focus on community.

Additionally, any development plan should consult with community on wants and needs, and seek for community support. Therefore, it is suggested that the GARP dedicates a section to engaging with community.

What could the planning system do	Ideas for the GARP
Seek and address the wants and needs of the local community	**Consultation with local communities on what they want and need in terms of urban greenspaces** ● Discussions with youth (year 11 and year 12) at a UN Youth SA Summit about urban greenspaces highlighted an

	observation of inadequate multi-functionality of urban greenspaces. Many youth, particularly those from first or second generation international families, felt that the needs of their community and culture were not being met. Greater Adelaide is culturally diverse and, as such the development of urban greenspaces should accommodate for this diversity. ● With reduced access to private greenspaces from infill comes an increased need for quality public greenspaces. Workshop participants discussed the rising needs of local communities to access and utilise public greenspaces in a manner that meets their diverse wants and needs.
	Foster community connection through activation hubs, community centres and other shared spaces Discussions at the workshops acknowledge that the cost of consultation can be high. A great, resource-efficient method of engagement is through established community connections and centres. Further, fostering community connection supports health and wellbeing.
Develop and foster opportunities for community to become engaged with their immediate environment	**Develop and foster opportunities for community to become engaged with their immediate environment** ● Recognition of community and local-driven projects as a gold standard for developing and maintaining quality urban greenspaces

Part 2 “Where will Greater Adelaide grow”, Urban Infill Growth

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

Workshop discussions recognised that large-scale strategic infill sites are limited, and therefore the necessity of smaller-scale development to support Adelaide’s population growth.

However, workshop discussions identified “small-scale infill”, particularly subdivisions, as a development mode especially problematic for quality and functional urban greenspaces and tree canopy coverage.

To ensure a sustainable transformation of Adelaide’s existing, low-density built form, policy emphasis needs to be placed on encouraging planned medium-scale development, and discouraging traditional subdivisions.

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

Infill development can better achieve an urban form consistent with the principles of Living Locally,

specifically in regards to access to open and recreational space (not that it is recommended "greenspace is included), should include prioritisation of public greenspaces in Master Plans of urban infill development.

Discussion points from the workshops included:

- Smaller-scale medium density, if applied correctly can lead to an increase in public green space. The potential of medium density development remains largely untapped in Adelaide's urban form.
- Create planning requirements to ensure adequate community green space through the process of densification.
- Developments designed with the assistance of experienced architects from early-stages achieved greater success in integrating effective natural environments.
- Improving on the current South Australian Urban Infill standards that are incompatible with the 2017 Greater Adelaide 30-Year Plan for a 20% increase in canopy coverage.

It was noted that smaller-scale medium density development, if carried out with greenspace in-mind, can be used in areas where larger-scale precinct developments are impractical. Workshop discussions commend medium-density developments as providing the greatest opportunity for reforming Adelaide's built form to accommodate increased density, support the Commissioner's 'Living Locally' goal, while providing opportunity to *increase,* not just maintain, public greenspace supporting the Commissioner's "greener, wilder and more climate resilient" Outcome.

Part 2 "Where will Greater Adelaide grow", Greenfield Development

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

Workshop discussions were largely not in favour of greenfield development; however, recognised it as part of the suite of options available for increasing housing supply.

Participants noted recent insufficient trends in greenfield development in Adelaide's North, South and Hills in providing adequate community space, streetscape provisions conducive to the 2017 30-Year Plans urban canopy goals, and lack of consideration for transport modes more conducive to "Living Locally", "a more social equitable place", and "a greener, wilder, and more climate resilient future".

Discussion Qs: How can greenfield development achieve an urban form that is consistent with the principles of Living Locally? *and* ***What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?***

- **Discourage development of traditional low-density greenfield developments.**
    - Workshop participants noted the large reduction in green space, whether native vegetation or farmland, as a result of low-density developments.
    - Ensure early development of community public space, and provision for future expansion of accessible recreation and socialisation spaces.

- **Retention, restoration and prioritisation of greenspaces in Greenfield areas for public use.**

    - Workshop discussions stress that Greenfield developments of the next 30 years needs to consider a change from historic philosophies of suburban, low-density developments that

prioritise the provision of private greenspace and account for trends of subdivision and accompanying reduction of private urban greenspaces.

- **Ensure greenfield developments feature a transprot infrastructure foundation resilient to future density.**
    - Transport-usage modelling to account for future densification; outer-suburban developments should anticipate densification.
    - Create accessible car-alternative transportation methods to key employment hubs (including the CBD); prevent the establishment of car-centric culture in greenfield developments.
    - Participants stressed that given the highly limited availability of land, planning policy and development *must* proactively integrate greenspace and transport infrastructure; further identifying that certain modes of transport (cars/roads) are less conducive to greenspace integration than other modes of transport (public rail, active transport).

APPENDIX

Workshop Outcomes

Below the barriers and challenges discussed during the workshop are described and grouped.

Drivers

- **Competing Landuse Interests and Planning**
    - Limited resources in urban planning and development e.g., space, funding, time
    - Population growth and urban infill
    - Conflict with a growth model
- **Physical barriers**
    - Historical and traditional prioritisation of grey infrastructure over living infrastructure
- **Restricted Enabling Conditions**
    - Limited capacity and expertise within local, state and federal government
    - Weak laws and restricted regulations
    - Low community awareness, ecological literacy and engagement
    - Bureaucratic challenges to effective collaboration

Consequences

- **Ineffective collaboration**
    - Late or inflexible inclusion of greenspace design into development plans
    - Insufficient unified language on the purpose and multifunctional benefits of greenspace
- **Low capacity and incentive to develop and maintain quality urban greenspaces**
    - Priotisation of maintenance and asset management

    - Low diversity of offering and overrepresentation of the same urban greenspace functions e.g., playgrounds and sports fields
    - Low street tree species diversity
    - Removal of street trees
    - Low consultation and response to the demographic diversity of the community
- **Low community demand for maintenance and development of quality urban greenspace**
    - Insufficient pressure on local, state and federal government
    - Expectation for all “empty” space to be developed
    - Removal of street trees
- **Low prioritisation of resources (space, time and funding) to quality urban greenspaces**
    - Design of quality urban greenspaced can be limited by a need to reduce extent of required the maintenance
- **Implementation gap between policy, strategy and outcome.**

DTI:PlanSA Submissions

From: The North Adelaide Society Inc. <northadelaidesociety@gmail.com>
Sent: Monday, 6 November 2023 4:59 PM
To: DTI:PlanSA Submissions
Cc: awleviston
Subject: Submission – Greater Adelaide Regional Plan – Discussion Paper – 30 Year Plan
Attachments: 20231106-TNAS-Submission-PlanSA-SAPC-GARP-DiscussPaper-lodged.pdf

> You don't often get email from northadelaidesociety@gmail.com. Learn why this is important

Mr Craig Holden
Chairperson, State Planning Commission
c/- Plan SA - Department for Trade and Investment
By email only: plansasubmissions@sa.gov.au

6 November 2023

Dear Mr Holden

Submission – Greater Adelaide Regional Plan – Discussion Paper – 30 Year Plan

Please accept the attached as the submission of The North Adelaide Society Inc. concerning the Discussion Paper addressing the above matter.

Thank you in anticipation of your consideration of our submission.

Please acknowledge receipt.

Yours sincerely,
The North Adelaide Society Inc. (est. 1970)

THE NORTH ADELAIDE SOCIETY Inc.
POST OFFICE BOX 60, NORTH ADELAIDE, SOUTH AUSTRALIA 5006

email is the preferred mode of correspondence
northadelaidesociety@gmail.com [**NFP**]

Mr Craig Holden
Chairperson, State Planning Commission
c/- Plan SA - Department for Trade and Investment
By email only: plansasubmissions@sa.gov.au

6 November 2023

Dear Mr Holden

Submission – Greater Adelaide Regional Plan – Discussion Paper – 30 Year Plan

Please accept this letter and *attachment* as the submission of The North Adelaide Society Inc. (TNAS) (membership: >200) concerning the Discussion Paper addressing the above matter. Please also accept our appreciation for your time and contribution to our Workshop discussions which has informed this submission.

TNAS hopes that the State Planning Commission (SPC) will:

1. step into the shoes and lives of local people and communities in considering the issues to which your Discussion Paper refers;
2. steer away from repeating the errors of the past resulting in an ongoing outward 'Americanised' urban sprawl, which continues to eat into areas of food production; and diminution of local, historical, and heritage character;
3. instead steer towards land use that will enhance and create local character and local communities, workplaces and industry within green spaces, much as Colonel William Light fought to achieve for the City of Adelaide; and
4. respect that the best development and land use is not one necessarily sought by a 'planning and development industry' but is best sought by respecting the wellbeing and health people and communities, and conserving what makes Adelaide and Greater Adelaide different, namely its historical approach for 'humanistic' and 'human scale' effective land use that enhances people living and working locally and regionally.

Thank you in anticipation of your consideration of our submission.

Please acknowledge receipt.

Yours sincerely,
The North Adelaide Society Inc. (est. 1970)

PlanSA **State Planning Commission**

Re: Greater Adelaide Regional Plan (GARP) – Discussion Paper

SUBMISSION:

Made by:

The North Adelaide Society Inc. **(est. 1970)** **(TNAS)**

TNAS has a large and diverse residential and business membership. It has a long and productive history of community engagement in, and contribution to, matters concerning planning and development, park lands and 'green spaces', character and heritage, residential, business, and transportation land uses; and environmental issues impacting neighbourhoods, local communities and Adelaide as a Capital City within the Greater Adelaide Region.

Per email only

plansasubmissions@sa.gov.au

About 30 year planning for Greater Adelaide:

"How should Greater Adelaide grow?"
What should be the "outcomes for Greater Adelaide?"
What "outcomes the State Planning Commission should consider?"
"Living locally … What neighbourhood features enhance living and working locally?"

INTRODUCTION

1. The Discussion Paper:
   - 1.1. Concerns the issue of land availability and land use envisage during the next 30 years.
   - 1.2. Appears primarily concerned land use and availability in the middle and outer areas of Greater Adelaide.
   - 1.3. Makes many assumptions, including rates of population increase that considerably exceed past rates of increase.[1]
   - 1.4. Addresses a wide range of matters in which TNAS and its members have an interest. However, the breadth of matters is beyond the capacity of TNAS to address in detail and the questions pondered by the Discussion Paper will be addressed '*en bloc*'.
2. TNAS has conducted a Workshop that has informed this submission.[2]
3. TNAS hopes that the State Planning Commission (SPC) will:
   - 3.1. step into the shoes and lives of local people and communities in considering the issues to which the Discussion Paper refers;
   - 3.2. steer away from repeating the errors of the past resulting in an ongoing outward 'Americanised' urban sprawl, which continues to eat into areas of food production; and diminution of local, historical, and heritage character;

[1] This submission does not address the appropriateness of assumptions made in the Discussion Paper, both generally and in respect of population increase in the City of Adelaide. This submission does note that past 30-year plans have made assumptions that have not come to fruition, such is the nature of assumptions and presumptions; and the population increase presumed for the City of Adelaide ought to note that to a significant extent the increase over the last decade or so has been the product of significant increases in temporary student accommodation, as opposed to ongoing stable and consistently occupied dwellings.
[2] Note: The content of footnotes are 'part and parcel' of this submission and is not the lesser for being included in a footnote.

3.3. instead steer towards land use that will enhance and create local character and local communities, workplaces and industry within green spaces, much as Colonel William Light fought to achieve for the City of Adelaide; and

3.4. respect that the best development and land use is not one necessarily sought by or in the interests of a 'planning and development industry' but is best sought by respecting the wellbeing and health[3] of people and communities; conserving what makes Adelaide and Greater Adelaide different, namely its historical approach for 'humanistic' and 'human scale'[4] effective land use that enhances people living and working locally and regionally.

CONSIDERATION

4. The availability of land for uses may be a product of the best appropriate use having regard to the natural or human-altered elements of the land and its environment.

4.1. That may be measured against contemporary societal spatial needs and western monetarised values.

4.2. Perhaps more importantly, it ought to be measured as against the impact of the possible uses on the land and its environment; and the human and environmental opportunity costs (immediate or inter-generational), including the loss of or impact on food and rural productive purposes and the loss of retained natural environment and ecology for the future.

5. **TNAS considers** that:

5.1. Urban planning is the process of designing, developing, and supporting urban areas to meet the contemporary and especially the reasonably expected future needs and wellbeing of the applicable community; and

5.2. Local communities (people and liveability) should be at the heart of planning, foremost in the mind of policy and decision-makers; and entitled to actively engage in the both the policy and practical processes of planning decisions with accessible equitable rights no less than apply to applicants, developers, and planning authorities. To do otherwise is to perpetuate an imbalanced and inequitable planning system and resultant contemporary and inter-generational outcomes.

6. **TNAS welcomes**:

6.1. The apparent recognition of the value of and support for retaining, enhancing and expanding characteristic, historical and heritage neighbourhoods, precincts and localities (i.e., 'character zones') and the value to the future of historic, cultural[5] and heritage built form. However, such zones and values apply equally to many towns or localities within the state and parts of the Greater Adelaide Region, and ought to no less be recognized as such;

6.2. Focus on 'local living' and local amenity, much as can be seen to occur in parts of the City of Adelaide and to a lesser extent the inner metropolitan area;[6]

---

[3] In this submission, a reference to "wellbeing and health" or "wellbeing" is intended to include contemporary and reasonably foreseeable environmental, social, economic, societal, and general health matters.

[4] '*humanistic urban environment*', Jan Gehl

[5] The cultural value of built form is an element of the historic fabric and the heritage of the built form. As a matter of policy, it is no less of value than built form fabric. That no less applies within the Greater Adelaide Region than it applies within the City of Adelaide and Metropolitan Adelaide. It is regrettable that a cultural value appears to have a lesser heritage value or 'performance' value than an altered built form in which it existed. A recent example is the approval by SCAP to demolish Adelaide's first charitable workshop and industry for blind people established by the Baptist Church alongside the Ebenezer Chapel. TNAS considers that that is an example of the void between policy and outcome; and exemplifies a need for a much stronger statement of policy in the GARP. Built form heritage is not only valuable for the varied appearance of historic build-stock but because it retains the history of how our community sees itself and tells the community story through its structures. A Plan without respect for culture and heritage does not makes Adelaide the lesser, not greater.

[6] This contrasts with the 'bigger is better' as one progressively moves away from the inner metropolitan area.

6.3. The inclusion of 'humanistic', 'human scale', and natural environmental considerations in the Discussion Paper and urges that that be foremost in mind in identifying land availability for future uses;

6.4. Absolute retention and protection of:

a) heritage and conservation zones and localities, and nonetheless urges further strengthening and improved processes;

b) small and broad-acre farming and food production land use (and preferably implementation of policies to support their enhancement and 'food security' values; and prohibition of inconsistent land use; incremental erosion of such land use; and that unrelated non-rural land use be confined to within township boundaries).

7. **TNAS urges**:

7.1. Adoption of land use policies and outcomes that apply **express quantitative criteria** (e.g., height, density, mass, scale, energy use, solar orientation, public green and wellbeing spaces, mobility) to achieve efficient and effective contemporary and future outcomes.

a) This can include minimum heights in appropriate circumstances or localities.

b) It is incongruous and perhaps somewhat perverse that a new residential development may include only one or two storeys/levels when the location or site can reasonably support three or four storeys/levels, simply because two storeys/levels may not require public notification, or may not be convenient to the applicant/developer.

c) It may also be incongruous that heritage built form may become increasingly degraded because re-use or renovation is constrained by current building requirements.[7]

7.2. Land use and attendant infrastructure being subjected to a greater focus on **measurable performance based outcomes** (i.e., based on quantitative criteria rather than subjective assessment or uncertain policy notions).[8]

This would include, for example:

a) Retaining and increasing trees, understorey, and biodiversity (including in the public realm and governmental development/infrastructure), and decreasing environmental degradation;

b) Transport options and car-based alternatives such as trains and light/rapid rail, integrated rail/road transit, rapid mass transport hubs, 'last mile' and local-mobility options such as small-wheeled (non-ICE[9]) modes; and walkability, shade,[10] and safety;[11]

c) Medium rise/density <u>with</u> surrounding green/wellbeing spaces and internal natural light and airspaces, including ground floor neighbourhood based local businesses and services. This would be more in the style of European or Continental village or local living hubs within green/wellbeing spaces and having mixed/diverse residential (and demographic/socio-economic) choices[12] and supporting business services, facilities, and

[7] This issue ought to be capable of being addressed by appropriate policy that is capable of being individually and pragmatically applied to a particular heritage listed built form.
[8] TNAS notes the submission lodged by "Community Alliance SA" (5/11/2023) and is generally supportive of many of the suggestions and recommendations therein.
[9] ICE means: internal combustion engine.
[10] The loss of street corner shade is most obvious within the City of Adelaide and wherever pedestrians are required to stand awaiting a change of lights. There was a period in which awnings and verandas were encouraged to be removed supposedly to allow views of buildings, with no regard to pedestrian comfort in the Capital City of the driest state on the driest continent; most bizarre.
[11] TNAS notes the submission lodged by the "Transport Action Network" (3/11/2023) and is generally supportive of many of the suggestions and recommendations therein.
[12] A demographic mix (single, couple, family, younger, older, private, social, co-op, socio-economic) ought generally to be a feature whether within a city, town, village, suburb, or precinct. A mix of dwelling creativity and styles will support diversity of communities. A mix of types of ownership, long-leasehold, and tenancies will enable diversity and mix of opportunities (residential and business).

amenities[13] on local 'high streets', as opposed to ongoing single level sprawl requiring car based travel to work, services, and facilities;[14]

d) Rainwater storage; grey water re-use; solar panels; low scale wind turbines;

e) Solar and environmental orientation (i.e., energy efficiency design and orientation) rather than priority for street facing presentation;[15]

f) Express levels/mix of required "affordable" dwellings[16] rather than the current 'incentive' based uplift of medium and high rise development;

g) Deleting 'catalyst sites', and alternatively confine them to 'master-planned'[17] greenfield locations (e.g., land releases) and rehabilitation or re-use of previously large scale industrial precincts (e.g., previous Clipsal industrial precinct; previous Gas works precinct; previous Brewery precinct);

h) Considering renewal options for locations where small dwellings occupy disproportionately large sites; or for minimum quantitative requirements for appropriate future development (built form and green/wellbeing space); and

i) That open space is reserved for open space and that the obligation for open space cannot be cheaply 'bought out' by instead contributing to an open space fund that may not be used for 'open space'. In medium density or medium rise developments, green open space ought not be capable of being 'bought out', which only exacerbates 'heat-sink cities'. Pocket parks have long been a feature of developments as long ago a Victorian London and European cities and ought to be reconsidered and reapplied in contemporary developments.

8. TNAS notes that it may have been helpful if the report of the Expert Panel had been released by the Minister contemporaneously with this Discussion Paper and notes that there is a state infrastructure paper that has also recently been released for public consultation that presumably will have a bearing on this Discussion Paper.

9. Thank you for the opportunity to make a submission.

The North Adelaide Society Inc. (est. 1970)
6 November 2023

–oOo–

[13] Business services, facilities and amenities is intended to include ICT, health, medical, and government/public services conducive to the amenity and needs of the precinct. There are many Continental urban examples of business/ shops on the ground floor with living on upper (2-4) levels that seem to work well and could be emulated within the Greater Adelaide Region and especially new large scale urban developments.

[14] There are many localities that partly emulate aspects of this European or Continental 'style', albeit almost invariably without the benefit of surrounding or nearby green/wellbeing spaces. Most obvious are those within or adjacent to the long-ago planned City of Adelaide, which one might consider to be somewhat ironic.

[15] Regrettably, the planning and development industry often appear to insist or promote priority of 'cookie-cutter' design to the street, rather than design for a living (incl. energy efficient) environment.

[16] In this submission, "dwelling" is intended to reflect the whole range of residences in which people live.

[17] 'Master-planned' has become somewhat of an oxymoron. It would be preferable that it was not so and would instead demonstrate that planning and environmental creativity can arise to again make future liveability and effective land use a hallmark of planning and diversity of development for Adelaide and Greater Adelaide, as it was when planning land use and the green envelope (Adelaide Park Lands) for the City of Adelaide. It is not only the planning and development industry, and government coffers, that have an interest; that applies also to future generations that will have to bear the inter-generational cost of any short-sightedness.

DTI:PlanSA Submissions

From: Jennifer Bonham <transportactionnetwork@gmail.com>
Sent: Saturday, 4 November 2023 5:47 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Transport Action Network Submision to the GARP discussion paper.pdf; Greater Adelaide Public Transport A Network for 21st Century Challenges.pdf

> You don't often get email from transportactionnetwork@gmail.com. Learn why this is important

Dear Growth Management Team

Please find attached the Transport Action Network's Submission to the Greater Adelaide Regional Plan Discussion Paper. The Submission includes the associated Paper 'Greater Adelaide Public Transport: A Network for 21st Century Challenges.'

Best Regards
Jennifer Bonham PhD
[redacted]

Transport
Action
Network

Attention: Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
E: plansasubmissions@sa.gov.au

3 November 2023

Thank you for the opportunity to respond to the Greater Adelaide Regional Plan Discussion Paper.

The Transport Action Network (TAN) comprises community organisations, active and public transport advocacy groups, urban and transport planners, practitioners, and researchers concerned for the future of sustainable transport and land use integration in South Australia.

TAN participants have reviewed the GARP Discussion Paper through a transport/mobility lens. As part of our submission, we have attached TAN's Paper *Greater Adelaide Public Transport: A Network for 21st Century Challenges*. The Paper includes transport proposals related to the development of Greater Adelaide over the next thirty years.

Wendy Bell LFPIA
Jennifer Bonham PhD,
Donna Ferretti PhD, LFPIA
Joanna Wells
for the Transport Action Network
transportactionnetwork@gmail.com

Response to the Greater Adelaide Regional Plan Discussion Paper

1. Guiding Principles

1.1 Alignment

Alignment with the State Planning Policies and other government strategies and plans is one of the principles said to be guiding growth and change of Greater Adelaide over the next 30 years. Given this, it is difficult to understand why the GARP and the Infrastructure SA Discussion Papers differ on the population projections used in the different documents. The GARP uses high projections stating that the Greater Adelaide Region could grow by as much as 670,000 people by 2051 whereas Infrastructure SA uses medium projections stating that the entire South Australian population will only grow by 500,000 people by 2051. This is a serious misalignment and raises questions about how well coordinated State Government agencies are in the development of policy and strategy.

We recommend:

- alignment of the projections to be used in planning for Land Use, Infrastructure and Transport for the next 30 years, and
- the medium projections serve as the basis of the GARP as this would put the anticipated population increase of Greater Adelaide at 420,000 people (84% of the State's projected medium population increase) which aligns more closely with the State's population growth over the past 50 years.

1.2 Integration

TAN sees integration as a fundamental principal of the GARP having called for an Integrated Transport and Land Use Plan in its 2022 position paper 'Creating Transport Choices.' We are concerned that the focus in the GARP discussion paper is on aligning future residential and employment development with motorways and arterial roads. This direction will further entrench car use, undermine the *living locally* objectives of the GARP (see Section 4.2) and thwart attempts to reap the individual, social and environmental gains generated by increased public transport patronage.

Further, growth in freight and passenger vehicles competing for road space will increase congestion and undermine productivity (see Section 4). Transport planners understand we cannot build our way out of congestion given the significant costs and relatively short-term benefits of road projects. It is imperative that the land uses, urban form, and infrastructure pursued in the GARP maximises:

- inclusive active transport connectivity between housing and local services and facilities,
- cycling and micro-mobility networks across suburbs, and

- the potential of public transport to move people across the Greater Adelaide region.

We recommend:

- significant strengthening of land use, inclusive active transport, and public transport integration within the GARP via a specific Integrated Transport Outcome informed by an explicit objective to improve existing and provide future infrastructure (see Section 2),
- strengthening land use and inclusive active and public transport integration in the State Planning Policies,
- ensuring strong land use and inclusive active and public transport integration policies are embedded in the Planning and Design Code,
- embedding, formalising, and extending the mass transit corridors, and mass transit investigation areas, in the GARP, and
- the inclusion of an implementation plan with clear and tangible actions, coordination with the appropriate agencies, and a 6 monthly reporting mechanism that ensures the implementation plan is being delivered for the purposes of transparency and accountability.

Finally, it is difficult to see how the principles set out on page 19 align with the principles on page 101.

We recommend:

- Clearly aligning the principles used to guide the GARP's scope and preparation with the principles for identifying Land for Housing and Jobs.

2. Proposed Outcomes

The GARP seeks to achieve four commendable outcomes over the life of the plan (pp. 36-80)

- 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.

TAN's response to the question on page 37 '*What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider*?' is as follows.

As indicated above, a key missing outcome is that of equitable and sustainable transport. References are made throughout the document to facilitating and promoting the use of public and active transport by locating housing within easy access of public transport routes and integrating housing with other land uses, *living locally,* to reduce car use and foster active modes.

> ‘Living locally aims to create connected, convenient, cohesive, and climate-smart communities, and to reduce the need for long-distance car travel, with an emphasis on physically active travel.’ (p84)

Living locally concepts have guided planning professionals and advocates for almost 100 years. Planners have also recognised that not all needs can be provided for locally and public transport is vital to ensure all citizens can access opportunities (health, education, employment, entertainment etc.) beyond their immediate area.

The GARP acknowledges that residents will continue to travel outside their local areas for employment and education opportunities yet it proposes locating new housing estates in areas that will not be served by public transport. This position is untenable. It compromises affordable living as households become locked into multiple car ownership and it creates transport disadvantage for those without a driver’s licence, those with a licence but unable to drive such as infirm elderly, and those who cannot afford to own, maintain, and operate a vehicle. These groups together are likely to make up approximately 50% of the population. Further, suggesting that new development should locate in areas with existing mass transport links does not reflect the existing under-provision of public and inclusive active transport infrastructure.

Addressing the ambition to increase inclusive active and public transport requires an associated Outcome.

This Outcome should be accompanied by appropriate integrated land use and transport directions with practical and implementable solutions that acknowledge and respond to SPP11 – Strategic Transport Infrastructure which it is currently silent on.

The inclusion of transport related objectives is well within the remit of a planning strategy:

- Victoria - *Plan Melbourne* – Outcome 3 - an integrated transport system that connects people to jobs and services and goods to market
- NSW - *Central City District Plan* – Direction 6 – A well connected city
- WA – *State Planning Strategy 2050* - Direction 2.1 - To manage the movement of people, goods and services through an integrated network connected locally, regionally, nationally, and globally.

We recommend adding the following Outcome.

- An equitable, environmentally sustainable **transport** network that facilitates inclusive, independent access.

3. Residential growth through a transport/mobility lens

3.1 City of Adelaide

The GARP Discussion Paper anticipates the CBD will continue to be a major centre for businesses, employment, and tourism. It is also forecasting a doubling of the City's population.

Population and employment growth will rely on creating and maintaining an attractive, liveable City Centre especially in the face of a warming climate. While the City of Adelaide is creating a City Plan to accommodate growth, it is incumbent on the GARP to acknowledge the role of State Government in supporting that plan. It will be essential to provide a high-quality mass transit network that allows employees and visitors to easily access business, retail, entertainment and cultural precincts in the City. This network will also allow residents and tourists to move easily around the City and visit places beyond it including beaches, regional towns, conservation and national parks, and wine growing centres.

Metropolitan and City of Adelaide strategies and plans have identified the need to link the northern and southern rail lines to improve the efficiency of the rail network.[i] Infrastructure SA also identified the need to investigate this link in its 2020 Plan.[ii] As we note in the attached paper, establishing that link via an underground CBD loop would improve access within and beyond the City of Adelaide (see Section 4). Reducing the need to use a private car to access the City Centre will improve air quality, reduce noise, allow a transition in street space to increase land available for greening and social interaction, and provide space for safe and convenient walking, cycling, and wheeling.

We recommend:

- including in the GARP an underground CBD loop that links the northern and southern rail lines (see also Section 4).

3.2 Urban Infill

TAN agrees that *strategic infill* is an important approach to increasing housing and that it should be located immediately adjacent existing public transport interchanges and judiciously selected light/heavy rail stops and stations. We also agree that strategic infill needs to be master planned to ensure the timely provision of services and facilities and access by well connected, inclusive, safe, and direct active transport networks.

Urban Corridor development is another obvious measure to increase the amount and diversity of housing within inner and middle suburbs. However, it should only proceed where high frequency, mass transit services have been established (or are in the active planning stages) and operate on their own right of way as much as practicable (e.g., on dedicated bus or high occupancy vehicle lanes at least in peak times). Reducing private motor vehicle traffic and prioritising the use of non-polluting buses (electric or green hydrogen powered) are essential to reduce pollution and ensure liveability and the health of residents along these Corridors.

Poorly located *general infill,* such as replacing single dwellings with 2 or more dwellings, is likely to exacerbate existing infill development issues including: increased local area traffic, intensified demand for parking, loss of greening and habitat, loss of tree canopy, increased urban heat, increased impermeable surfaces, increased volume and rate of stormwater runoff. The *greyfield* residential precinct planning trialled in the City of Maroondah and incorporated into the City's development plan can address these issues.[iii] Identifying *greyfield* sites in inner and middle suburbs adjacent to public transport, and facilitating land assemblage by neighbouring home owners can facilitate increased housing with better design, more greening and reduced environmental impact.

Adelaide residents generally accept the need for infill and the fact that urban landscapes change. They are largely concerned with the overdevelopment of sites, poor design of infill, and failure to protect or enhance green infrastructure on individual sites.

We recommend:

- for *strategic infill* development,
    - working with inner and middle ring councils to identify more strategic infill sites in the GARP, particularly for affordable housing,
    - ensuring sites included in the GARP are located adjacent to existing public transport hubs and master planned to ensure walkable/cyclable neighbourhoods with safe, inclusive, and direct connections to public transport and local services and facilities, and
- for *urban corridor* development
    - include in the GARP areas with existing or planned high quality mass transit services,
    - work with the Department for Infrastructure and Transport to ensure corridors identified in the GARP are targeted for measures to significantly reduce the need for and use of private motor vehicles, including freight vehicles, and
- investigate *greyfield* precinct planning for inclusion in the GARP.

3.3 Outer suburban, peri-urban and township growth

A multiplicity of sites has been identified for development from Concordia, Riverlea, Two Wells and Dry Creek to Mount Barker, Sellicks Beach, Murray Bridge and Victor Harbor/Goolwa. The housing will be so widely dispersed across the Greater Adelaide region that newly developed areas will not reach the threshold populations required to support the local services and facilities that make it possible to *live locally*, reduce the need for car travel, and enable inclusive active transport.

Land release at Dry Creek is worrying especially given the warning (p103) to avoid growth in hazardous areas. Dry Creek is within sight of the Adelaide CBD but it will be inaccessible for anyone who does not have access to a car. The land is flood prone, it will be difficult and costly (if even possible) to remediate to support the level of greening required to reduce

urban heat in a warming climate, and it is bounded by major roads with no direct, safe, easy walking and cycling access to public transport.

We recommend:

- reducing the number of areas proposed for new growth,
- concentrating new growth in and around established townships such as Two Wells and Murray Bridge,
- master planning all new growth areas to ensure:
    - housing has safe, inclusive, direct, active transport routes to existing town centres and local services and facilities,
    - location of new services and facilities are identified and established with early occupancy,
- ensuring high quality public transport to new developments with services operating from early occupancy, and
- not proceeding with any development at Dry Creek.

Housing Affordability and Living Affordably

We are pleased the Discussion Paper sets out the differences between housing affordability and living affordably (p97). The costs to government, households, and community of locating people in different areas have been well researched.[iv] The NSW productivity commission included public transport provision in their calculations and put the average cost of outer metro development at $75,000 more per house than for inner metropolitan developments.[v]

The GARP Discussion Paper acknowledges the vulnerability of outer suburban car-dependent households to rising petrol prices but there are personal health, household and community costs that are generally not captured in research that compares location costs. These include *mobility of care* journeys[vi] such as 'serve passenger' journeys (e.g., taking children to school and elderly parents to medical appointments). According to recent Australian research, serve passenger journeys are still largely made by women.[vii] These costs are amplified when there is a lack of transport options including public and inclusive active transport, walking, cycling, micro-mobility, and shared mobility.

We recommend:

- analysing, or at least acknowledging, the broader range of costs associated with living in different locations.

3.4 Innovation in housing location

The discussion paper refers to locating new, diverse, multi-unit housing adjacent to major centres. TAN suggests a more innovative approach. For example, car parking areas at major Centres such as Noarlunga, Tea Tree Gully, Marion, Ingle Farm, Arndale among others

present opportunities for Public Private Partnerships that provide housing at the doorstep of these facilities.[viii] This could involve undergrounding a portion of existing car parking and providing diverse, multi-unit housing within a green, walkable setting connected to centre facilities.

We recommend:

- GARP include investigating public private partnerships at major shopping centres to co-locate housing and walkable neighbourhoods on a portion of existing car parks.

3.5 Housing/employment nexus

Local employment. As noted, the 'living locally' concept acknowledges there will be limited local employment. It is unclear how 'co-working' spaces and 'working from home' will develop into the future. These latter changes are likely to see an increased use of local areas for exercise and social interaction. It is vitally important that new and existing neighbourhoods are made walkable with inclusive active transport access to local parks, community, and retail/hospitality services. Local governments will need financial assistance and enhanced expertise to adapt local environments to changing workplace locations.

We recommend:

- including co-working spaces as a feature of the changing employment landscape and identified in master planning of new developments,
- acknowledging the additional resources and expertise local governments will require to adapt local environments to changing workplace locations, and
- including a target to work with DIT to reduce the default speed limit in local streets to 30km/h to facilitate local and connection trips by walking and cycling.

Industrial/employment growth areas. The Discussion paper recommends locating housing close to employment growth areas. In some cases, land near these sites is inappropriate for housing because of the nature of the land (e.g., flood prone) or the nature of the industry (e.g., potential pollutants). Further, people's housing and employment decisions may not closely align.

The paper is silent on how cross metropolitan, and intra- and inter-regional transport needs of employees will be met. It appears that the road network is expected to address both freight and personal transport demands for the next 30 years. As noted in Section 1.2 this will ultimately undermine the efficiency of both passenger and freight movements. Relying on private transport for the work commute impacts the liveability of neighbourhoods that abut major arterial roads and motorways – whether with noise or air pollution, neighbourhood severance, or cross suburban access. These impacts are already keenly felt in

the inner and middle suburbs, outer suburban centres such as Salisbury, Elizabeth and Noarlunga, and townships such as Mt Barker and Gawler.

We recommend:

- identifying public transport routes that facilitate fast, efficient access into employment hubs.

4. Sustainable Transport

The Discussion Paper acknowledges that the transport sector is responsible for 29% of GHG emissions and notes the role of active and public transport in reducing these emissions (pp48-49). Australia's transport sector GHG emissions are forecast to rise over the next decade before they begin to fall sometime in the mid to late 2030s.[ix] Electric vehicles will help reduce operational transport sector GHG emissions in the latter part of this Century but they will not a 'silver bullet.' If Greater Adelaide is to reduce transport related GHG emissions, improve personal and environmental health, ensure equity, and secure the liveability, productivity, and prosperity of the Region, the GARP will need to re-focus attention away from motorways/arterial roads (p94) and toward mass transit.

TAN welcomes the Mass Transit routes to Two Wells, Murray Bridge – Mt Barker/Nairn, and Sellicks Beach identified in the Discussion Paper. Similarly, the Mass Transit Investigation areas are significant. However, greater ambition is required in a Plan for the next 30 years. As part of our submission, we have attached TAN's Transport Choices and Public Transport Papers. The former outlines the need for a well-integrated Land Use and Transport Plan while the latter focuses on developing a public transport network for the Greater Adelaide Region including improvements to the bus and rail networks.

Perth, Brisbane, Sydney, and Melbourne have made and/or are making substantial investments in public transport infrastructure and services. These are the Capitals that have grown at a significantly greater rate than Adelaide (and Hobart) over the past 50 years.[x] It is worrying that despite tentative steps to include Mass Transit in the GARP Discussion Paper, the Infrastructure SA Discussion Paper does not envisage significant investments in public and active transport over the next 30 years.

Addressing climate change while ensuring a well-functioning, productive Region requires taking steps now to facilitate a shift away from rather than reproducing an unsustainable transport status quo.

We recommend:

- embedding mass transit corridors in the Greater Adelaide Regional Plan to service all proposed growth areas and facilitate interregional and interstate services,
- as per Section 3.1, identifying the need to link the northern and southern rail lines, preferably via an underground CBD loop, to transform the efficiency and attractiveness of the rail system, and
- identifying extensions of the tram/light rail system at least to North Adelaide-Prospect, and Adelaide Airport.

4.1 Trends in Transport/Mobility

The GARP acknowledges changes in transport/mobility that will gather pace over the next 30 years.

> Along with changes in how and where people will travel to and from work, autonomous vehicles and micro-mobility vehicles (e.g. e-bikes, e-scooters) will also influence daily travel patterns. Over the next 30 years the pace of change will increase as technology and digital connectivity increase electric and autonomous vehicle participation in the shared economy. The accessibility and affordability of this technology, and the facilitation of car and ride sharing could lead to demand shifts from public transport back to cars, which in turn might increase congestion (p68).

E-Bikes, e-Scooters and other Personal Mobility Devices are at the forefront of changes in how we travel. These vehicles have a role to play as feeder modes to public transport and they are also changing the terrains and distances people can travel without relying on a car. When people do need a car, share vehicles will play an increasing role. Adelaide is slowly following interstate trends with an increase in the availability and use of share vehicles. It is likely that cosmopolitan millennials,[xi] interstate visitors and environmentally conscious householders will push the share vehicle trend as part of a shift to mixed- or multi-modality.

Mixed modes or multi-modality (i.e., people using a variety of modes across a given time-period) have long been a feature of transport. However, the focus on single modes in our data collection has made active and micro-modes (e.g., skateboarding) largely invisible. Research into Mobility as a Service has helped direct attention to multi-modality and this needs to be understood in the South Australian context while planning our future urban form.

Despite acknowledging changing transport/mobility practices, the GARP remains silent on what the various trends mean for land use planning and State Planning Policies.

We recommend:

- providing deeper insight into the trends and potential of eBikes, micro-mobility, and share vehicles, and
- identify how these modes will be integrated into land use and infrastructure policies and planning to ensure their potential is realised in reducing GHG emissions and improving equity of access.

Autonomous Vehicles. The implications of fully Autonomous Vehicles (AVs) for the movement of people in urban environments remain largely unknown. Ongoing concerns relate to the regulation of vehicles, the role of and issues in using Artificial Intelligence in AVs, public acceptance, interactions in complex environments, impacts on public health, increased congestion, and higher demand for and cost of associated infrastructure.[xii] AVs will not replace the need for public transport but autonomous buses and trains are likely to play a significant role in the provision of public transport.[xiii]

We recommend:

- greater elaboration of the potential role, limitations and impacts of AVs on Greater Adelaide.

4.2 Transport and *Living Locally*

As noted above, we agree that well designed and systematically implemented *living locally* plans can facilitate greater use of low carbon and no-carbon modes. The *living locally* concept echoes objectives of the 30 Year Plan and should be readily achieved in master planned communities. However, the public and active transport targets of the 30 Year Plan were, respectively, exceedingly low and never on track to be met. This failure indicates the disconnect between the existing State Planning Policies that are aligned with the *living locally* concept and the implementation of these policies via Development Plans and, more recently, the Planning and Design Code (PDC). Success of the *living locally* concept in terms of accessing everyday needs via active transport will rely on Land Use and Transport Integration Policies being strongly embedded in the Performance Outcomes of the PDC coupled with high quality master planning and stringent compliance.

It is difficult to see how the *living locally* concept aligns with the 'motorway/arterial road' plans for housing and employment growth (p94). When people rely on private vehicles to access activities outside the local area, they will need to drive through their local area to reach the motorways/arterial roads. They are also likely to use their vehicles to access local services as they trip chain 'on the way to/from home.' This will have significant local impacts, such as giving over land to car parking and prioritising car movements on local roads, which will undermine walkability and walking as key objectives of *living locally*.

A *living locally* strategy will need to integrate services and facilities into public transport stations and interchanges. Co-location encourages people to access services and facilities 'on their way to/from public transport.' It allows the local areas to be produced as attractive, walkable public spaces.

We recommend:

- embedding *living locally* policy objectives in the Planning and Design Code Performance Outcomes,
- embedding master planning of all new housing estate developments into the Planning and Design Code Performance Outcomes,
- state funding for local governments to significantly increase their role in development compliance,
- working with local governments to identify public transport interchanges and key stop/stations to apply the *living locally* concept in established areas, and
- introducing targets and other incentives to ensure public and active transport improvements are solidly on the agenda.

Implementing Living Locally: Master Planned Growth

Setting minimum housing and/or population densities (p91) fetishises density as the key determinant of active and public transport use. It is noteworthy that the outer suburbs of the City of Ghent, Belgium has similar population, housing, and service densities to the inner suburbs of the City of Unley and yet for the journey-to-work Ghent's outer suburbs have three times the public transport use, four times the level of cycling and double the amount of walking.[xiv] It is clear densities are one factor influencing active and public transport use. However, as Paul Mees has argued, focusing on density has also allowed transport and urban planners to dismiss investments in public transport.[xv] Failing to invest in public transport entrenches private motor vehicle ownership, multi-car households and transport disadvantage. Failing to provide public transport on the simple measure of density ignores the important role that other measures play in supporting mass transit including: the overall extent and quality of the public transport network, attractive, inclusive, safe, and direct walking and cycling environments connected to public transport routes, feeder modes such as eBikes, micro-mobility and buses to public transport hubs, cultural representations, and life course experiences of different modes.[xvi]

Understanding density as but one factor in public transport use, will help reverse the hesitancy of South Australian policy makers in delivering active and public transport infrastructure improvements. Quality active and public transport networks are being delivered in towns and cities of similar density throughout the world. The recent Benchmarking Adelaide report found that Adelaide ranked last amongst its peers for the quality of its bike network and overall.[xvii] Adelaide was also the only peer city where the number of hours lost to congestion has increased since 2019.

We recommend:

- removing housing/population densities as a determinant of public transport provision, and
- the GARP identify the need to make walking the *easiest*, rather than simply an *easier*, mode in meeting inclusive active transport goals of living locally.

4.3 Transport, Regional Centres and Service Hubs

The GARP Discussion Paper does not address the role of existing regional centres (e.g., at Tea Tree Gully, Elizabeth, Salisbury, Noarlunga, Marion) and regional service hubs (e.g., Hospitals, University Campuses, Human Services Clusters) in the future of the Greater Adelaide Region. It does not address the relationship between proposed population growth areas, existing regional centres/service hubs and access between them. These regional centres and service hubs can be the nodes in a regional network connected by high quality public transport.

We recommend:

- identifying the relationship between regional centres/services hubs and proposed growth areas and access between these locations, and

- embedding mass transit improvements in the Greater Adelaide Regional Plan that help create a network of centres/services hubs and significantly improve connectivity between these locations, and
- generate innovative housing solutions to increase population within close-proximity to regional centres/services hubs.

5. Targets and Data

Transport is a fundamental dimension of each of the proposed GARP outcomes and we recommend, as per Section2, adding a Transport specific Outcome to ensure inclusive active and public transport are addressed. If the *living locally* concept is to be realised, it will require targets and ongoing data collection. Targets and associated data collection and reporting will help ensure local services and facilities are established in a timely manner.

Targets and associated data collection and reporting will need to be set for both infrastructure development and use of active and public transport. This should include:

- expansion of walking and cycling infrastructure in established and new areas,
- extent of road network with footpaths on both sides of the street,
- levels of service of walking and cycling infrastructure,
- expansion of the public transport network,
- upgrade of stations and station precincts,
- annual rates of walking, cycling, micro-mobility, and public transport use, (beyond journey to work),
- increase in public transport services,
- public transport data collection that identifies where people board and alight to better understand how the network is used,
- improvements to walking and cycling connectivity (zebra and wombat crossings installed, upgrade of intersection and mid-block crossing points to improve safety for active travellers),
- reduction in private motor vehicle kilometres travelled and corresponding savings in carbon emissions.

Existing local and state government data collection and reporting mechanisms should be able to capture the expansion of walking and cycling infrastructure, and the level of service of walking and cycling infrastructure.

State government data collection and reporting mechanisms can capture expansion of public transport infrastructure and services. Additional data collection methods will be required to capture the stops and stations that people board and alight from vehicles.

A rolling household travel survey can provide base line travel data for use of active and public transport and capture changes in use to determine whether targets are being met.

6. In Summary

TAN supports the concept of living locally as set out in Sections 2 and 4.2 and advocated in the joint submission to the GARP Discussion Paper by the Active Living Coalition, Bike Adelaide, Bike SA, Walking SA, and the Heart Foundation. TAN recommends a much greater focus on and innovation in infill as per Sections 3.1, 3.2, and 3.4. Infill housing needs to be master planned with high quality site design, diversity of housing, high level of greening with greater on-site storm water management and infrastructure (including charging stations) for share vehicles, eBikes, eScooters and electric vehicles. Crucially, infill needs to be located adjacent to public transport and existing services and provide safe, direct, connected active transport access to destinations within and beyond the infill area.

Development in the outer suburbs and peri-urban areas should not be dispersed across new greenfield sites but should be master planned and concentrated around existing townships and sub-regional centres that have high levels of services and facilities. Any new development in outer suburbs, the peri-urban area, and townships must be accompanied by an expansion of quality public transport services.

The Greater Adelaide Regional Plan requires a much greater focus on integrating all future development with active and public transport. A sustainable transport outcome that addresses the needs of the entire population, as described in Section 2, should be included in the GARP Outcomes. This Outcome requires targets, base line data and ongoing data collection (as noted in Section 5) to track whether targets are being met. TAN supports the Urban and Transport Planning and Design Features set out in Figure 3 of the joint submission made by the Active Living Coalition et al.

It is also essential to identify targets for the other Outcomes identified in the GARP. For example, in meeting environmental and equity Outcomes a target can be determined for the proportion of new developments with *Green Star – Communities* (or similar) ratings. TAN supports the elaboration and regularisation of active and public transport data collection and analysis identified in the joint submission made by the Active Living Coalition et al. The Department of Infrastructure and Transport should bear responsibility for collecting, analysing, and publicly reporting on transport for all modes and diverse journey types.

Related SPPs	What could the planning system do	Ideas for the GARP
SPP 1 – Integrated Planning	**Greener, wilder and climate resilient region** **GARP comment** • Promote an urban form that encourages greater use of active transport options, such as walking, cycling and public transport. *Issue* promotion is a long way from '**fostering** an urban form that **enables** the use of active and public transport.'	**Greener, wilder and climate resilient region** **Ideas Proposed in GARP** 1. Continue to have a target for walkable communities that is annually benchmarked and reported 2. Identify sites for strategic infill along major corridors, transport routes, and activity centres serviced by rapid transit public transport 3. Identify new areas for renewal, as our major strategic brownfield sites such as Lightsview and Bowden become full 4. Plan new greenfield growth near existing or new employment nodes 5. Capitalise growth in areas with existing open space networks in the CBD, along river corridors and near major urban parks 6. Capitalise growth in areas well serviced by active travel networks, including designated cycle ways, such as the Mike Turtur and Amy Gillett bikeways. *Issue* Idea 2, the focus of strategic infill along major corridors and transport routes will entrench private car use and exacerbate the associated environmental issues. Idea 4, any greenfield growth should be prioritised near public transport routes that service existing or new employment nodes. Idea 6, the existing cycle ways are not sufficient to support the existing population more need to be delivered combined with other mechanisms such as improved cycling and walking connection to existing mass transit stations, bike racks on buses, lowered speed limits etc *Recommended enhancement* 2. Identify sites for strategic infill in activity centres serviced by rapid mass transit, at interchanges and key public transport stops/stations, and along existing and planned public transport routes. 4. Plan any new greenfield growth near public transport routes that service existing or proposed new employment nodes.

		7. Capitalise growth in areas well serviced by active travel networks, including designated cycle ways, and continue to introduce better and safer active transport networks in the existing Greater Adelaide Region servicing activity centres, school etc. **8.** Foster an urban form that enables the use of active and public transport *This needs to be accompanied by clear and tangible objectives of proven interventions that truly enable the use of active and public transport.*
	Equitable and socially cohesive **GARP comment** • Identify areas for growth that are or can be serviced by cost effective infrastructure and maximise positive social outcomes. *Issue* The concept of 'cost effective' is likely to be interpreted in simplistic terms as 'financial' cost rather than taking account of the full range of costs (e.g., costs of transport disadvantage, costs of serve passenger journeys, independent access) associated with the supply of different types of transport infrastructure. *Recommended enhancement* Identify areas for growth that are or can be serviced by socially, environmentally, and economically effective infrastructure to maximise positive social outcomes.	**Equitable and socially cohesive** **Ideas Proposed in GARP** 1. Concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure (e.g., roads, schools, healthcare, water). 2. Prioritise and stage the release of zoned land based on transparency of costs to the community of different forms of housing supply (including upfront development and ongoing living costs). *Issue* Idea 1. This Idea needs to align with the sentiments on increasing public transport use expressed in the Discussion Paper. As it stands it fails to identify heavy/light rail and the O-Bahn (e.g., at/adjacent to interchanges) as potential areas for growth. *Recommended enhancement* 1. Concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure (e.g., public transport corridors including heavy/light rail, O-Bahn and roads, schools, healthcare, water)
	Smarter, cleaner, regenerative future **GARP Comment** • Identify employment land supported by strategic infrastructure.	**Smarter, cleaner, regenerative future** **Ideas Proposed in GARP** 1. Identify and protect industrial land to provide employment to growing communities, including in key areas such as:

	Issue 'Strategic infrastructure' does not indicate how employees will access these sites.	• Along the South-Eastern 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 key freight connections • At Lonsdale • In North-western locations, including Gillman, Wingfield and LeFevre Peninsula. *Issue* Simply locating industrial land near growing communities does not guarantee access for potential employees. *Recommended enhancement* **1.** Identify and protect industrial land served by existing or planned mass transit to provide and ensure access to employment for growing communities, including in key areas.
	Housing choice in the right places • Target housing growth in areas well serviced to maximise previous or planned investments in transport and other infrastructure. • Identify areas for new growth that can be supported by cost-effective infrastructure. *Issue* Housing growth needs to be targeted to maximise previous and planned investments in public transport not transport *per se.*	**Housing choice in the right places** 1. Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing (including upfront development and ongoing living costs) 2. Prioritise strategic infill sites that are generally more economic to service than general infill 3. Focus infill supply in locations where there is capacity in infrastructure networks 4. Build on existing infrastructure capacity in townships where local councils identify growth opportunities. *Issue* Cost calculations described in the discussion paper do not include the full range of social, environmental, and economic costs associated with different housing locations. Future cost calculations need to include these dimensions.
SPP 3 – Adaptive Reuse	**Equitable and socially cohesive** **GARP Comment**	**Equitable and socially cohesive** **Idea Proposed in GARP**

	• Identify opportunities to enhance areas of cultural or heritage value *Issue* This is limited in scope *Recommended enhancement* Identify opportunities for transforming car parks into mixed used developments including housing.	1. Identify underused buildings to provide cultural, social and economic benefits and target for investment (include underused historical precincts and assets). *Issue* There are broader, innovative opportunities for adaptive reuse. For example, car parks can be transformed in mixed use developments including housing. *Recommended enhancement* • Identify underused buildings, car parking facilities (at grade and multi-level), and underutilised land to provide cultural, social and economic benefits and target for investment (include underused historical precincts and assets).
SPP 6 – Housing Supply and Diversity	**Equitable and socially cohesive** **GARP Comment** • Identify housing opportunities in areas well-connected to services, employment, and infrastructure. *Issue* Fails to include public transport in contrast to the various statements throughout the GARP Discussion Paper.	**Equitable and socially cohesive** **Idea Proposed in GARP** 1. Identify strategic infill sites to provide more housing choices in areas near public transport, services, and employment options. *Issue* For reasons outlined above, all housing supply will need to be in areas near existing or planned public transport, services, and employment options. *Recommended enhancement* 1. Identify strategic infill sites and sites near existing townships to provide more housing choices in areas near existing or planned public transport, services, and employment options.
	Smarter, cleaner, regenerative future **GARP Comment** • Identify housing opportunities that support the economic viability of strategic centres.	**Smarter, cleaner, regenerative future** **Idea Proposed in GARP** 1. Identify regeneration and strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth. *Issue*

		Similar to the idea for adaptive reuse, this Idea could explore other opportunities for mixed use and housing development such as car park areas at major shopping centres. *Recommended Enhancement* 1. Identify regeneration and strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth including adaptive re-use of car parks.
SPP 9 – Employment Lands	**Equitable and socially cohesive** **Identified in GARP** • Identify employment lands well serviced by public transport, and which provide an attractive place to work.	**Equitable and socially cohesive** **Idea Proposed in GARP** 1. Distribute sufficient employment lands to meet local demand for jobs and reduce travel distances 2. Identify areas for mixed-use developments that bring together housing, jobs and lifelong learning. *Issue* This Idea needs to align with the sentiments on increasing public transport use expressed in the Discussion Paper. Reducing travel distances does not inherently translate to reducing private car travel. *Recommended enhancement* 1. Identify employment lands well serviced by public transport, and which provide an attractive place to work.
	Smarter, cleaner, regenerative future **GARP Comment** • Identify sufficient employment lands in appropriate locations to meet future demand for traditional and new industries.	**Smarter, cleaner, regenerative future** **Ideas Proposed in GARP** 1. Protect and capitalise on employment land in the Inner Metro and Inner Southern regions for future knowledge-based industries and innovation precincts 2. Identify sufficient employment land to service growing populations in areas including Mount Barker, Murray Bridge, Northern Adelaide, Goolwa, and Victor Harbor.

		These are both especially important and the need for access by public transport needs to be reiterated.
SPP 11 – Strategic Transport Infrastructure	**Noticeably absent from the GARP discussion paper** • Foster development that enables high levels of public transport use, walking, cycling and micro-mobility, to reduce reliance on private car travel.	*We recommend* 1. Identify sites for new development within 400metres of existing or planned high quality public transport. 2. Ensure safe, direct, convenient walking, cycling and micro-mobility networks to destinations within and beyond new developments.

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Transport Action Network

Greater Adelaide Public Transport:
A Network for 21st Century Challenges
2023

Tom Wilson and Jennifer Bonham PhD
for the
Transport Action Network

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1. Executive Summary

The Greater Adelaide Region needs an **integrated land use and transport plan** to meet the challenges of housing affordability, population health, social equity, environmental sustainability, and economic development. The future is multimodality where people use a variety of modes of transport across a day, week, month, or year. Currently, we do not have data that readily captures multimodality.

This Paper focuses on public transport forming the backbone of a vibrant, equitable, and prosperous region. It conceptualises public transport infrastructure and services as a *network*, not a system, to emphasise movement from anywhere to anywhere across Greater Adelaide with changes in direction enabled at key transfer and activity nodes.

The Paper offers a range of proposals for improved public transport in both newly developing and established areas across Greater Adelaide.

TAN's foremost ask is that public and active transport planning forms a central component of the new Greater Adelaide Regional Plan.

Most transformational amongst TAN recommendations is the connection of the north and south rail lines and the creation of several new CBD stations via an Underground City Rail Loop. These interventions are considered fundamental to improving the efficiency, accessibility, service frequency and patronage of the Adelaide heavy rail lines and, by extension, would greatly enhance the operation of the entire public transport network. As a priority, we recommend developing the case for this project and preparing an application for Federal Government infrastructure funding.

We outline a variety of proposed requirements for heavy rail, light rail/tram, and bus services in newly developing and established areas, including expanding Adelaide Metro services into towns and communities which form part of the Greater Adelaide Region.

As localities flagged for significant future growth, we propose reinstating rail services in the outer north-west to Riverlea, Virginia and Two Wells and in the outer north-east from Gawler to Concordia, Roseworthy, and the Barossa. We propose an urgent trial of a reinstated rail service to Mt Barker with an extension to Murray Bridge in the longer term, extension of the Seaford line to Sellicks Beach, and in the longer term, investigation of extensions from both Sellicks Beach and Flinders University.

In the near term, we recommend investigating light rail to the airport via Keswick Creek and, in the longer term, investigating conversion of the Outer Harbor and Grange heavy rail to light rail to enable greater long-term expansion.

Improvements to bus services include implementing peak hour bus priority lanes, extending the operating hours of Go Zone services, and implementing or increasing services that connect town centres.

We anticipate all public transport services to be supported by walkable neighbourhoods and integration into local and metropolitan cycling/micro-mobility networks.

The Federal Government's commitment to rejuvenating Australia's rail network and its renewed focus on Cities and Suburbs has created the right conditions for public and active transport plans that create a lasting positive legacy for Greater Adelaide.

Priority recommendations:

- Conceptualise and plan for public transport as an anywhere-to-anywhere network.
- Embed public transport in the Greater Adelaide Regional Plan, Infrastructure SA Plan, and Green Energy Transition Plan.
- Commence analysis, consultation, planning, and seeking funding for underground CBD loop.
- Commence trial of the Mt Barker line.
- Secure rail corridors to areas identified for new development including Sellicks Beach, Concordia, and Two Wells.
- Integrate safe, convenient walking and cycling routes with existing and future train stations and public transport interchanges.
- Progressively expand bus priority lanes on arterial roads and extend Go Zone network and operating hours.
- Implement a fairer fare structure and expand Adelaide Metro across the Greater Adelaide Region.
- Investigate light rail via Keswick Creek to the airport.

2. Planning for the Growth of Greater Adelaide

The challenges we face in terms of environmental sustainability, equity within and across generations, housing supply and affordability, aging of the population, personal health, amenity, liveability, attracting industry investment, and retaining a skilled workforce all demand a sophisticated approach to guiding the development of Greater Adelaide. The location of new development, whether within the established urban footprint, in greenfield sites or regional centres, requires judicious decision making. It is wise to augment populations in existing centres and ensure any new housing estates have the threshold populations required to support local services from the outset of occupancy and avoid additional or longer journeys. Any proposed development requires close alignment with sustainable forms of transport so that people can move safely and efficiently in their local areas by active transport while maintaining public transport access to opportunities across the broader region.

Since the Metropolitan Adelaide Plan was adopted in 1962, Adelaide has been developed as a low density, dispersed metropolis. This dispersed settlement was to be facilitated by a network of motorways and cloverleaf interchanges according to the 1967 Metropolitan Adelaide Transportation Study (MATS). The public transport components of MATS were largely ignored in the subsequent debates over the Study and almost lost to history when the motorway components of MATS were rejected by Adelaide residents. However, from the mid-1990s, variations of the motorways and ring routes envisaged in MATS have been designed, funded, and constructed but the Public Transport projects have been somewhat overlooked.

South Australians have demonstrated their commitment to using quality public transport with a resurgence in light rail patronage after the upgrade of the Glenelg line and on-going high patronage of the O-Bahn. Public transport patronage peaked at 76.1million in 2018/19 and slumped during the COVID pandemic (commencing early 2020) as people worked from home or changed modes.[1]

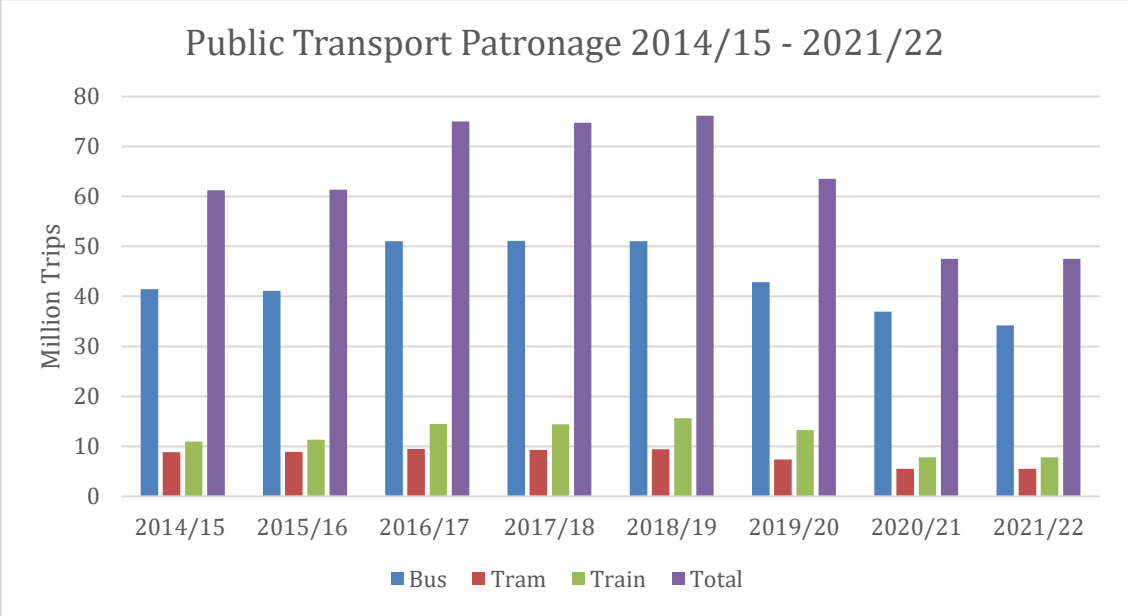

Figure 1. Data Sources: DIT Annual Reports (2014/15-2021/22)

Together the Greater Adelaide Regional Plan and the Passenger Transport Strategy offer a once in a generation opportunity to put both Greater Adelaide and South Australia on a pathway to sustainable transport and land use integration.

Despite our significant concerns about the expanding urban footprint, the announced new land releases and potential development in regional towns offers an opportunity to plan and deliver a comprehensive public transport *network* for Greater Adelaide.

Conceptualising public transport as a *network* anticipates people moving anywhere-to-anywhere across Greater Adelaide with transfer nodes allowing fast, smooth changes in direction. A *network* approach calls for the expansion of Adelaide Metro services and a fairer fare structure. Currently, communities beyond the reach of Adelaide Metro are served by limited frequency, commercially operated bus services with high fares and little to encourage patronage. Councils in these areas are concerned about the risks to their communities of poor public transport services.[2] These risks will be exacerbated if proposed increases in population are not accompanied by significant investment in public transport. The Brisbane and Perth public transport networks stretch for 180 km and 120 km north to south respectively. It is time for the South Australian Government to expand Adelaide Metro to better serve all communities within the Greater Adelaide Region.

TAN's Paper 'Greater Adelaide Public Transport: A Network for the 21st Century' uses a *network* approach to public transport. It anticipates integration of heavy rail, light/rail and bus routes with active transport networks and land use planning practices that locate people in safe, convenient, inclusive comfortable active transport reach of the everyday services and facilities they need. Our paper focuses on heavy rail as a central component of the Greater Adelaide transport network as it can carry people efficiently to employment, education, social and cultural hubs across several stops or the entire metropolitan area.

Although this paper addresses the Greater Adelaide Region, TAN strongly supports further investigations into: investment in regional passenger and freight rail, enhancing intra- and cross- regional bus services, and improving bus services in regional centres.

3. Transport: Why Public Transport Matters

Transport plays a critical role in everything we do. It is one of the most effective platforms to address the environmental, social, and economic challenges facing the Greater Adelaide Region. Share and private vehicles, including driver deferred vehicles, will meet some of Greater Adelaide's future transport needs. However, they cannot serve as the backbone of the Region's long term transport network. A comprehensive public transport network well-integrated with local land uses and active transport (walking, cycling, scooting, and skating) networks is vital to addressing each of these challenges together.

3.1 Environmental Sustainability

Urban heat, stormwater runoff and pollution (air, soil, and water) are widely acknowledged and well understood road transport environmental issues. They are key factors in warning against increasing road capacity with major new road infrastructure and intersection and road widening projects. For the past 30 years, the front of mind environmental issue for transport researchers has been climate change.

The transport sector contributes 19% (93million tonnes (Mt)) of Australia's GHG emissions. These emissions are forecast to increase to over 24% (103Mt) by 2030 and despite starting to fall after that date they will still be above current levels (99Mt) in 2035.[3] Increases in emissions are due to uptake of vehicles such as SUVs and increasing activity of medium and heavy-duty trucks.[4]

While leading the country in reducing electricity sector emissions, South Australia is lagging on transport emissions. South Australia's transport sector emissions are 29% (6.3Mt) of total emissions with passenger vehicles[5] accounting for 45% (2.8Mt) of these emissions.[6]

Fuel efficiency standards, electric and hydrogen powered vehicles, incentive programs for electric and hydrogen fuel cell vehicle uptake, and rollout of electric battery charging stations are part of the solution to reducing transport sector GHG emissions. Renewable energy sources will eventually eliminate vehicle *operating* emissions and, in decades to come, recycling and green manufacturing will reduce vehicle production related emissions. However, the pace of change will not be fast enough for transport to play its role in keeping global temperature increases to 1.5 degrees Celsius. Further, environmental concerns around critical minerals mining and materials such as micro-plastics will need to be addressed to improve the 'green credentials' of renewable energy powered vehicles.

South Australia has over 1.38m cars and sports utility vehicles in its fleet and on current trends this will reach 1.72m by 2050.[7] Only, 0.5% of Australia's vehicle fleet is fully electric and electric vehicles make up 3.8% of annual new vehicle sales.[8] This figure is projected to increase to 23% of new vehicle sales by 2030.[9] The second hand car market, where commercially registered electric vehicles are sold as passenger vehicles, will also assist in the transition to a no-carbon transport fleet. However, even if we had 100%

uptake of electric (or hydrogen fuel cell) vehicles as of today (August 2023), it will take three decades to transition to a renewable energy powered passenger vehicle fleet.[10] Transitioning the vehicle fleet to renewable energy sources is essential but it is an adjunct to, not the centre piece of, a rapid reduction in transport sector GHG emissions.

South Australians want to participate in reducing their GHG emissions. A comprehensive public transport network well-integrated into local neighbourhoods with direct, safe, and amenable walking and cycling routes will be fundamental to reducing GHG emissions and improving the amenity and environmental quality of neighbourhoods. Patronage on the O-Bahn and Glenelg light rail routes are testimony to the keenness of South Australians to use quality public transport services.[11] Enabling more people to catch public transport through improved services, better local access and expanded infrastructure can quickly reduce transport sector GHG emissions.

3.2 Social cohesion, equity, and housing affordability

Public transport services are essential to independent access for all South Australians. About 70% of South Australians are reported to hold a driver's licence but not all licence holders own, have access to, or are able or confident to use a car for all the journeys they want to make.[12] This is particularly so for the 20% of licence holders (250,000 people) in younger and older age cohorts. Older people modify their journeys, such as the distances and times of day they travel, as they age and transition away from driving.[13] Those who have used a mix of modes throughout their lives and have good access to other modes (active and public transport, mobility scooters) are in a better position to relinquish a driver's licence altogether.[14] Younger people, particularly teenagers and older children, are also put at risk through poor transport options. Lack of public transport combined with a built environment that fails to provide for active transport (walking, cycling, scooting, and skating) undermines their independent mobility and the social and spatial skills developed through this independence.[15]

In Australia, it is women who continue to provide the greater share of transport services, 'mobility of care journeys,' for family members, friends and others in their networks who do not have access to reliable transport options.[16] There can be positive dimensions to these 'serve passenger' journeys but as a regular responsibility it often brings additional stress into everyday routines. Driver deferred (aka autonomous) vehicles may, in the long-term, provide access for a greater proportion of the population but this comes with the risk of increasing rather than reducing traffic congestion and requiring additional infrastructure.[17] A comprehensive public transport network well-integrated with active transport networks can ensure independence and equity for the vast majority, of our population.

Quality of public transport varies significantly across Greater Adelaide and the South Australian regions. Providing new housing in outer suburban and peri-urban areas without quality public transport services and integrated active travel networks is untenable. It will continue to create transport disadvantage and exacerbate cost of living and affordability pressures. Savings on lower cost housing is lost if families must buy

second (and as their children grow up third or fourth) cars to meet their transport needs. In 2022, the cost of owning, maintaining, and running a car for Adelaide residents was put at over $17,000.[18] Fuel accounted for 26% of this cost and it will be exacerbated as petrol prices remain high for the foreseeable future and forecast 'oil shocks' create price spikes.[19]

International research indicates millennials (those born from the early 1980s to late 1990s) are more likely to be multimodal (use a range of modes) than older age cohorts. Millennials are reported to be more likely to walk, cycle and use public transport.[20] Of course, millennials are not a homogeneous group and socio-cultural factors have a bearing on transport mode. Further, there is a risk they will become mono-modal, particularly car dependent, as they move through lifecycle stages (e.g., partnering, having children) and moving to locations more affordable for a family, if these locations do not provide the full range of transport options.

Traditional cost benefit analyses (CBA) often report low return on investment for additional public transport services. Using traditional cost benefit analysis for Adelaide's O-Bahn showed a Benefit-Cost ratio of 0.7, yet the O-Bahn has been highly successful. This shows that traditional cost-benefit analysis either needs to be modified or at least not be the only factor in determining the worth of a project. Recent research indicates that the direct value of additional public transport services is significantly greater (4:1) in areas where people are at risk of mobility related social exclusion.[21] Transport CBA's need to include the broader social, and physical and mental health dimensions of transport services and infrastructure projects. Masking the social and individual health expenditures associated with these dimensions distorts the CBA results.

3.3 Economic Sustainability

Infrastructure Australia and the Bureau of Infrastructure and Transport Research Economics (BITRE) have regularly warned of the rising costs of congestion across the Greater Adelaide Region.[22] Infrastructure Australia has acknowledged that congestion cannot be addressed by road building alone but requires significant investment in public and active transport. Research has consistently demonstrated that expanding road capacity increases the rate of traffic growth and the amount of traffic on the overall road network.[23]

The road building 'solution' may ultimately undermine the productivity of our urban environments. As Engineers Australia notes:

> Over 80 per cent of Australia's GDP is produced in cities, while the total transport sector (all modes) represents 7 per cent of GDP (ABS 2018). In this context, the local economy in an urban area may be worth more than any travel time savings from road upgrading.[24]

Road widening has opportunity costs in removing valuable urban land from other uses. In the case of major road projects, it is not only the roadway itself but adjacent land must be taken up to address the impacts of high traffic volumes and speeds. The financial costs of acquiring land and the costs to the community and local economy of displacing businesses and households means road widening is not a viable transport

solution into the future. Property acquisition made up a significant proportion of the costs of widening the Portrush/Magill, Fullarton/Glen Osmond, and Fullarton/Cross Road intersections. In addition, it is well understood that any expansion of the car-based infrastructure induces further car traffic (induced demand), through the perception of easier and quicker travelling amongst those who previously did not use these roads, eventually leading to loss of any short-term time savings and worsening congestion

By contrast, public transport projects can generate broader economic benefits. Clearly, one of these benefits is to increase patronage and move more people into and through a locality with a smaller infrastructure footprint than is possible by road. An SKM study into the Glenelg Tram extension reported a significant increase in daily patronage into, around and through the CBD once completed.[25] Further, a recent study in Melbourne, reported that improvements in heavy rail resulted in uplift benefits for properties within an 800metres of stations: that is, properties within the 800metre radius had a higher value (over 8%) than those in the surrounding area.[26]

The SKM study also identified a significant increase in employment in the CBD tram catchment area. This second point is echoed in a recent international review of the literature that shows with relevant land use policies light rail can increase employment in the catchment corridor with businesses able to improve access for employees by re-locating into these more favourable areas.[27] Employment access benefits have also been demonstrated for heavy rail, including in low density urban areas.[28]

The South Australian Economic Statement identifies four key workforce challenges in South Australia.[29] Two of these are directly related to transport.

- A *spatial mismatch* between the location of available jobs and willing workers—whether that's in regional parts of South Australia, within Adelaide's suburbs, or the state as a whole.
- The existence of *barriers to participation and utilisation*, particularly for marginalised groups, leading to poorer employment outcomes.

The supply of quality public transport within Greater Adelaide and across regions can connect workers to existing employment hubs and facilitate greater workforce participation by marginalised groups.

Individual rail line improvements are important but it is the extent and quality of the overall network, access to stations and the potential to travel anywhere across the network rather than to a single central destination, that makes services attractive and increases the return on investment.[30]

The health costs associated with sedentary lifestyles have been attributed, in part, to over-reliance on automobile travel. Active transport (walking and cycling) has been demonstrated to have a ROI of 13:1 and 5:1 respectively. The high return on investment for walking (13:1) and cycling (5:1) infrastructure makes the integration of public and active transport a worthwhile investment.[31] As noted in the previous section the health

impacts of transport infrastructure and services need to be included in Cost Benefit Analyses.

We need to ask whether it will be possible to attract or retain a skilled, well-educated workforce in Adelaide if the first thing they must do is buy a car to achieve a modest level of access?

Public Transport for the 21st Century

Overall, Greater Adelaide will lag on goals of prosperity, equity, sustainability, and liveability if we simply substitute electric/hydrogen power for fossil fuel vehicles and plan for the transport status quo. This paper offers proposals for a comprehensive public transport network integrated into walking and wheeling networks to reduce the extent and cost of congestion and provide greater, more equitable access for all people living in and visiting Greater Adelaide. We cannot afford to be inactive or even worse, take counter-productive actions to delay the transition towards socially, environmentally, and economically sustainable transport.

4. 'Doing' Sustainable Land Use and Transport Integration

4.1 'Doing' Integration

'Doing' integration means thinking transport and land use together. It will vary according to: location - whether it is an established or newly developing area, existing and proposed land uses and their relation to each other, existing and proposed modes of transport, the design, construction, and regulation of infrastructure that enables access. Above all, doing integration will be shaped by what we hope to achieve and the people we anticipate serving.

TAN is keen to ensure people can access everyday goods, services, and facilities within easy walking, cycling, scooting, or skating distance from their homes. It would be ideal to access employment, education, social and cultural opportunities close to where people live. Remote access will make more of these opportunities available over time and this will increase the importance of local neighbourhoods. For the foreseeable future, people will still want or need to travel beyond their local area. Quality public transport will be essential for accessing non-local opportunities. Public transport can operate more efficiently than the private car to areas with a high concentration of activities. Following from this, it can reduce the use of private cars and therefore reduce their impact on both those activity centres and local neighbourhoods.

Public transport nodes can also operate as community hubs with local shops and community services located at stations and interchanges. Creating community hubs at public transport nodes reinforces the role of both hub and node. Increasing connectivity between public transport and retail/entertainment centres such as at Elizabeth, Playford and Tea Tree Gully can begin to create genuine community hubs. Public Private Partnerships to underground some car parking and a portion of land for medium density living can put people in closer proximity to the services they need and foster community hubs. Active transport access to community hubs/public transport nodes maintains the amenity of the hub and extends the reach of both public and active transport.

Achieving land use and transport integration means embedding the necessary infrastructure and regulations when planning new developments and ensuring they are delivered. In established suburbs it means retrofitting those suburbs to facilitate public and active transport access. TAN is currently working on a 'doing integration' project. In this paper we have focused on integrating public transport to create a network that ensures people can move anywhere to anywhere.

4.2 Elements of an Efficient Public Transport Network

The Queensland Department of Transport and Main Roads has published a comprehensive guide to Public Transport Network Infrastructure.[32] TAN has adapted a few of their recommended approaches below. These are proposed as guiding principles for further developing Adelaide Metro as a well-functioning and accessible public transport network.

Connectivity

- Network. Transport infrastructure and services should be designed as a network, for efficiency as well as ease of movement across Greater Adelaide. Conceptualising public transport as a network, rather than an A to B system, emphasises movement between key transfer and activity nodes, which enable efficient changes in direction.
- Local. Walking and wheeling (cycling and micro-mobility) infrastructure is inexpensive and provides for deeper connectivity into local neighbourhoods. Personal and environmental benefits of walking and wheeling can only be realised when these modes are prioritised with direct, safe, comfortable, well-shaded and legible routes.

Convenience and Catchment

- Stops and stations are to be conveniently located for pedestrian access – e.g., generally within 400m-500m of homes (origins) and centrally within activity centres (destinations). Patrons may choose to walk longer distances, such as to high-quality rail services, however the intention of the network as-a-whole is to offer a high level of accessibility and fine-grained connectivity.
- Cycling and micro-mobility extend public transport catchment areas and facilitate better access in dispersed suburbs. Secure, conveniently located bike parking at train stations and major bus/tram stops will enable bike access. Public transport services that are only conveniently accessed by car not only encourages car use but also pushes up demand for expensive Park'n'Ride facilities.

Transfers

- Seamless transfers between services are fundamental to network efficiency. Weather protection, comfortable conditions, and short transfer times at key nodes and activity centres make for quality customer experience.

Speed and frequency

- Public transport vehicles *operate most efficiently in their own right of way*. Bus priority lanes, at least during peak hour, will improve the efficiency of the bus network and make it more attractive to shift mode away from the car.
- High service frequencies encourage public transport as it allows people to 'turn up and go,' taking the anxiety out of using public transport, and maximising flexibility for patrons.

Value Capture

- Land use planning at and around train stations and bus interchanges should seek to increase activities and residential opportunities through carefully considered mixed use development. Stations and interchanges need to be designed to seamlessly integrate into surrounding activity spaces.

Photo 1: Value Capture, Walkability and Connectivity at Bowden, South Australia (Jennifer Bonham)

Photo 2: Value Capture and Walkability at the tram interchange, Bordeaux, France (Tom Wilson)

5. Reinvigorating Heavy Rail

Train services provide for the outward expansion of urban development more effectively than buses alone. It is essential to identify, secure and maintain suitable corridors for rail into areas subject to urban and regional development in the next 50 years. Regional and interstate railways should be evaluated and secured for new, revived, and realigned services. Hybrid battery/electric powered trains can reduce the cost of converting Adelaide's diesel trains to renewable energy.

Valuing rail users is essential to retaining and increasing heavy rail patronage. In areas where increasing land use intensity is not possible in the short term, the quality of access to stations is essential to maximising patronage.[33] Upgrading stations and station precincts, investing in existing public transport network connectivity and prioritising access for feeder bus services, and investing in safe, direct, and convenient local active transport connectivity represent immediate opportunities to deliver better, more accessible, and more attractive environments and services.

5.1 Central – Underground City Rail Loop (Figure 2)

The entire public transport network can be transformed by connecting the northern and southern lines via an underground CBD loop. This connection has been included in metropolitan Adelaide and City of Adelaide plans and strategies since the 1960s and it is a project that's time has come. Infrastructure SA has acknowledged the functionality and attractiveness of Adelaide's heavy rail network is constrained by the limitations of having only a single, non-centrally located, CBD station.

> The terminus nature of the Adelaide Railway Station puts a natural constraint on the rail network as it limits the number of trains that can be put into service at any one time and results in frequencies of 15–30 minutes for most services…the terminus nature of the Adelaide Railway Station will need to be reviewed with the potential to create a CBD rail loop. While this will provide operational efficiencies, any study should also consider the potential economic benefit of enabling more intensive development of CBD employment precincts when needed, and a shift to greater public transport use in existing intensive employment zones such as the Royal Adelaide Hospital and BioMed City precinct.[34]

The underground loop will improve access across the metropolitan area as well as throughout the CBD. Such important infrastructure projects have occurred in all other Australian mainland capital cities (e.g., Sydney's Underground Loop and new Cross-Harbor North West to South West Line, Melbourne's Underground Loop and Metro 2, and Cross River Rail in Brisbane) as well as Auckland, New Zealand.

Connecting the northern and southern rail lines via an underground city rail connection will have the following **benefits**.

- Significantly reduces train time at the station and associated operating costs allowing for productivity gains with more services per shift.

    - Currently there is up to 8minutes delay on every train as drivers change ends when stopping at the Adelaide Railway Station.

- Addresses suppressed demand for cross metropolitan journeys.
    - Currently, transferring passengers at Adelaide Railway Station must change platforms and can take from 1minute to well over 20 minutes for a connecting train. The average wait times for a sample of north-south connecting services (62 peak and afternoon services) is 12 minutes.
    - In the Underground loop it is likely that trains for several different lines will share the same platforms, following each other through the loop, or stopping on either side of the same Island platforms. In such cases changing between trains will involve virtually no walking (just wait a few minutes) or crossing an island platform (less than one minute's walk).
    - A more attractive rail service can spur more intense development at select suburban stations.

- Enables the creation of several new CBD stations that will:
    - increase access and convenience for passengers,
        - currently people with destinations of more than 10minutes walk from Adelaide Railway Station are less likely to catch the train (see Table 1), and
    - effectively triple the train catchment area and facilitate greater utilisation of trains,
        - currently Adelaide rail patronage is 1/3 of Perth CBD and 1/4 of Brisbane CBD.

- New stations will facilitate interchange with to all other city public transport services.
    - A station near Hindmarsh Square would link with buses on Grenfell Street (including the O-Bahn) and Pulteney Street.
    - A station at Victoria Square would link with the trams and with all King William Street buses.
    - A station at Whitmore Square would link with buses using Morphett Street and Sturt Street.

- Modifying existing Adelaide Station buildings and platforms can facilitate services that do not utilise the underground rail tunnel, such as interstate and regional services, and provide space for other activities.

- Modifying track requirements at Mile End and leading into the Adelaide Railway Station could see land made available for other uses such as a return to parklands.

- Utilising expertise and workforce capacity developed with the Torrens to Darlington (T2D) project and incorporating knowledge developed interstate in the Metro 2 and Cross River Rail projects.

The Time Has Come

Advocacy for this project sits at the intersection of three key factors: the Federal Government's renewed focus on heavy rail, Infrastructure Australia's revised assessment criteria to include Climate Change, and the opportunity to apply for Federal Grant funding for a major project beyond Torrens to Darlington.

An underground loop is estimated to cost $3b - $5b and modern tunnel boring machinery (TBM) now being used extensively internationally can undertake much of the work.

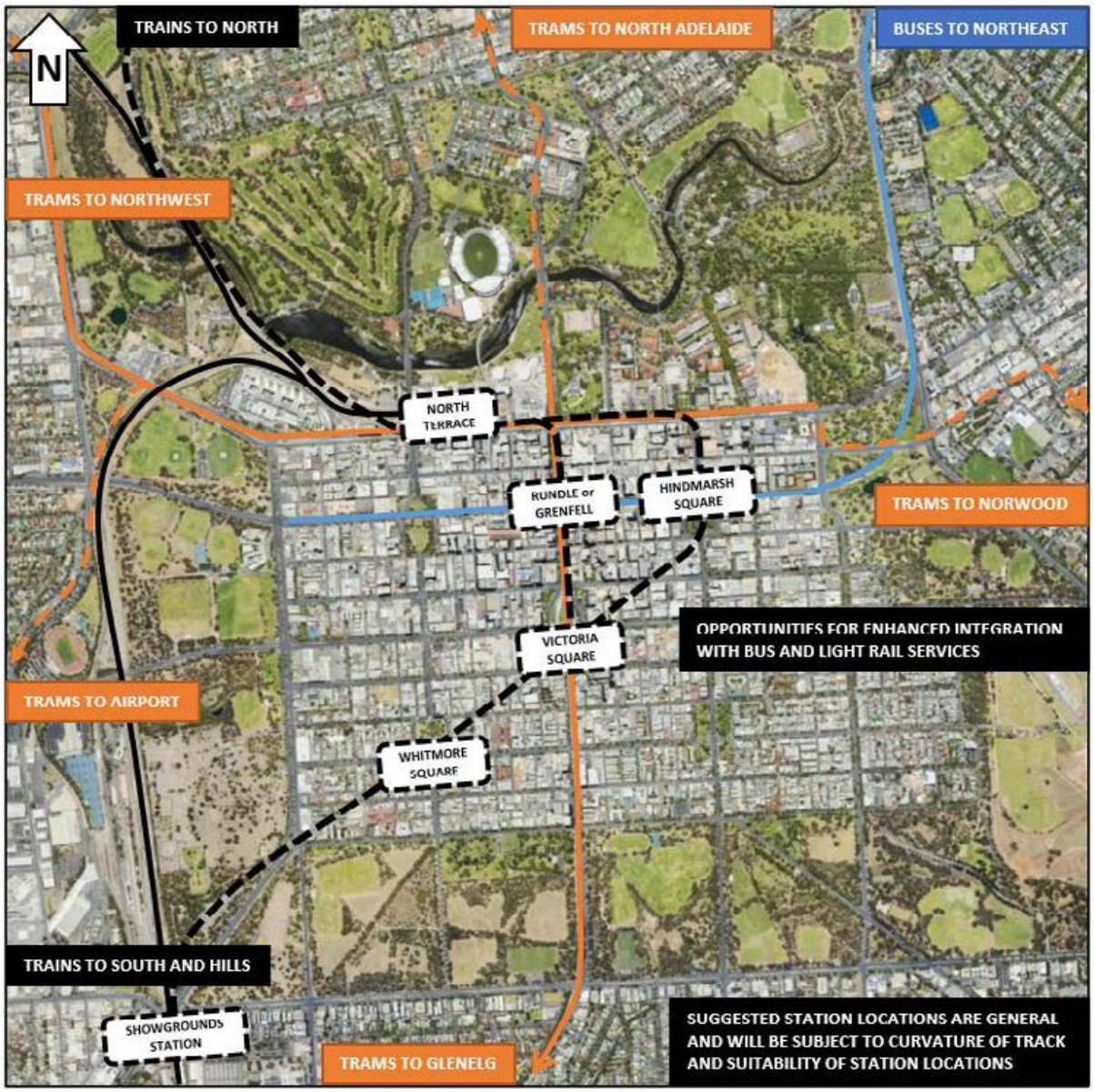

Figure 2: Underground City Rail (Map adapted from SAPPA). Possible routes for an underground loop integrating with buses on Grenfell Street, including the O-Bahn, and existing and potential new tram routes.

Table 1: Access Time Differences: Current vs Underground Loop

Destination/ Service	Seaford, Flinders & Belair Lines (from Showground Station)	Time in Minutes**	Gawler Line (from Ovingham Station)	Time in Minutes**
Adelaide Railway Station	Current Via New Loop	7 12	Current Via New Loop	6 6
Hindmarsh Square*	Current: 7(T) + 18 (WW) Current: 7(T) + 8 (WW) + 8 (T/B) Via New Loop: 9(T)	25 23 9	Current: 6(T) + 18 (WW) Current: 6(T) + 8 (WW) + 8 (T/B) Via New Loop: 9(T)	24 22 9
Victoria Square*	Current: 7(T) + 16(WW) Current: 7(T) + 4(WW) + 11 (T/B) Via New Loop: 6(T)	23 22 6	Current: 6(T) + 16(WW) Current: 6(T) + 4(WW) + 11 (T/B) Via New Loop: 12(T)	22 21 12
Whitmore Square*	Current: 7(T) +23 (WW) Current: 7(T) + 10(WW) +10 (T/B) Via New Loop: 3(T)	30 27 3	Current: 6(T) +23 (WW) Current: 6(T) + 10(WW) +10 (T/B) Via New Loop: 15(T)	29 26 15

Notes: Current – all trains via Mile End; T – Train; WW - Walk and Wait (at lights/for tram or bus); T/B: Tram/Bus
*New Station
**The table uses actual times. Transport planners add weightings to items like walking and waiting that are based on passenger surveys of how annoyed or inconvenienced they are by walking and waiting. These are sometimes double the in-vehicle time.

Possible Routes:

- Trains from the north could dive underground in the vicinity of the rail yards, heading between the University buildings on North Terrace, under Morphett Street, and east beneath North Terrace and integrating with the Adelaide Railway Station underground.
- Trains could then turn to the south from North Terrace to Victoria Square, either via a direct route with a Central CBD station in the vicinity of King William / Rundle Mall / Grenfell Street or looping further to the east with wider coverage with a station in the vicinity of Pulteney Street / Rundle Mall / Hindmarsh Square. Both options would then continue from Victoria Square through the southwestern part of the CBD.
- Trains could then continue underground, emerging to link with the southern lines north of the Showgrounds Station. Trains from the south would follow the same route through the CBD in reverse of the above, linking with the northern lines west of Adelaide Station
- Tunnel boring machines are being used on other Australian undergrounding projects, increasing local knowledge and skills, and addressing issues of 'cut and cover' proposals. Cut and cover involves excavating a trench, covering with a tunnel support structure, and then refilling with excavated material. It is not really feasible in areas with above ground constraints – like buildings and precious parklands.
- The optimal alignment and location of new stations may be subject to constraints relating to the required curvature of the track and availability of suitable land for stations.

  Similar interstate projects are delivered with Federal Funding and South Australia has not sought funding for rail projects for some time. Rail projects will benefit from the new Infrastructure Australia assessment criteria which address climate change.

Photo 3: Heavy rail, Mawson Lakes, South Australia. (Jennifer Bonham)

5.2 Northern Heavy Rail

5.2.1 Virginia, Riverlea, Two Wells and beyond (Figure 3)

Housing construction is well underway at Riverlea and adjacent areas with a current population of approximately 11,000. The 2020 Land Supply Report for Greater Adelaide contemplates capacity for up to 23,000 new dwellings or 53,000 new residents. Currently, services and facilities in the area are limited and it is unlikely to be a significant employment hub in the short- to medium- term.

This area can be served by rail either by:

- Branching from the Gawler Railway at Salisbury and following, at least partially, the interstate railway via Direk and Virginia. This route would have the advantage of providing a link from Riverlea and Two Wells to Salisbury and other potential passenger destinations along the Gawler Line; or
- Branching from the Gawler Railway in the vicinity of Dry Creek and proceeding along the proposed freight corridor to the west of Port Wakefield Road to Virginia. This route would provide a faster link with Adelaide from Riverlea and Two Wells.

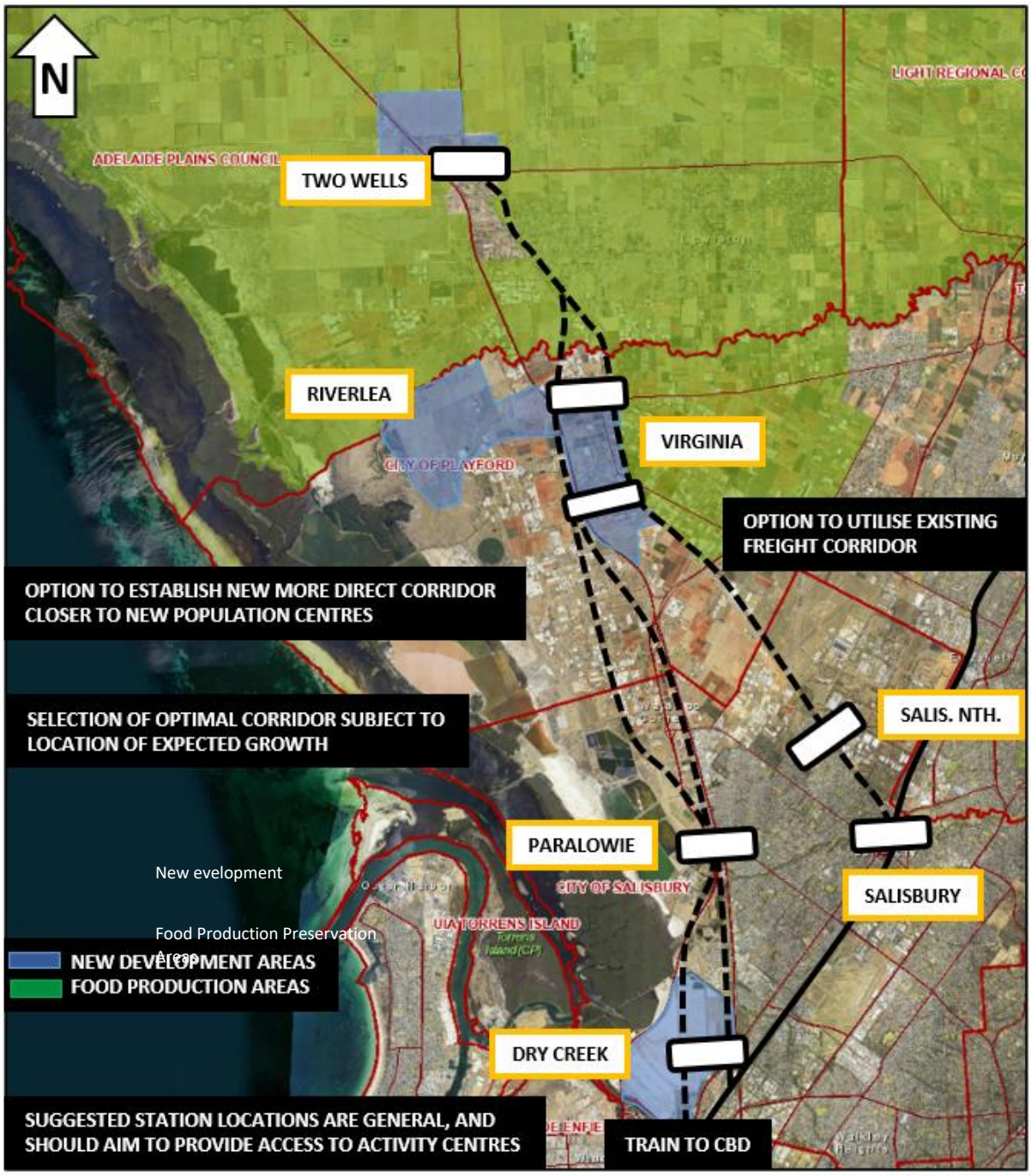

Figure 3: *Virginia, Riverlea, Two Wells and beyond (Map adapted from SAPPA)*

5.2.2 Gawler, Roseworthy, Concordia (Figure 4)

Current population approximately 31,500 – capacity for up to 17,500 new dwellings or 40,000 new residents is contemplated in the 2020 Land Supply Report for Greater Adelaide. Midway between Gawler and Lyndoch, there is a real risk that these towns will be overwhelmed by traffic if retail and community services are not provided in Concordia with first occupancy. If development of Concordia proceeds, it presents a vital opportunity

to create a walkable community hub around the train station with high quality public spaces, and a mix of services and facilities.

Existing disused railways already run through both Roseworthy and Concordia. These lines could be extended to both Concordia and Roseworthy in the shorter-term, with a potential longer-term extension to the major towns of Tanunda and Nuriootpa. Localised alignment improvements to increase the line speed and reduce travel times could be of benefit to the service.

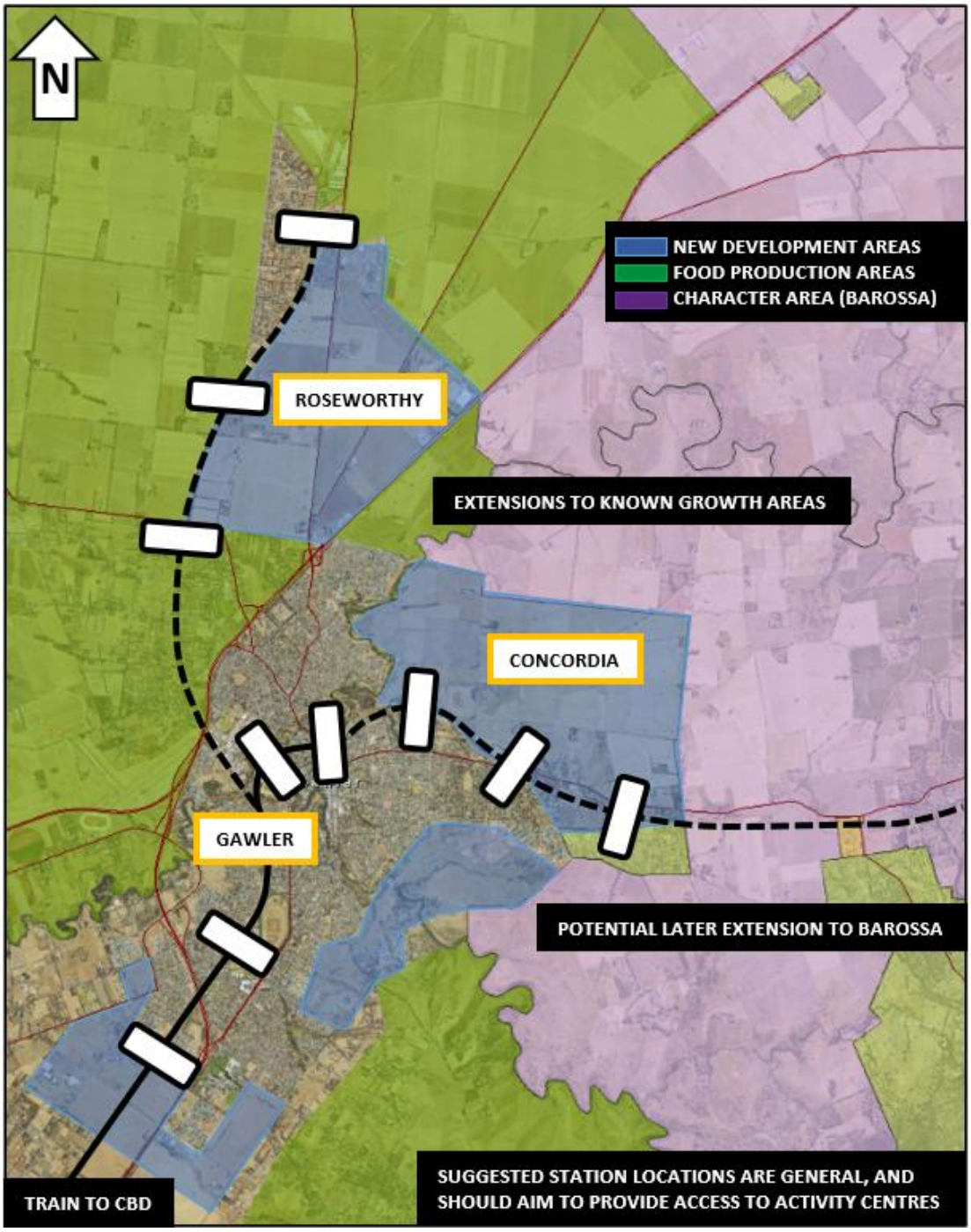

Figure 4: *Gawler, Roseworthy, Concordia* (Map adapted from SAPPA)

5.2.3 Lyndoch, Tanunda, Nuriootpa, Angaston (Figure 5)

The current population in this area is approximately 24,800. Capacity for up to 1,600 new dwellings or 3,800 new residents is contemplated in the 2020 Land Supply Report for Greater Adelaide.

Existing disused railways run through the Barossa as far as Nuriootpa. These lines could potentially be reactivated as-is, or may benefit from some localised alignment improvements to increase the line speed and reduce the number of road crossings required.

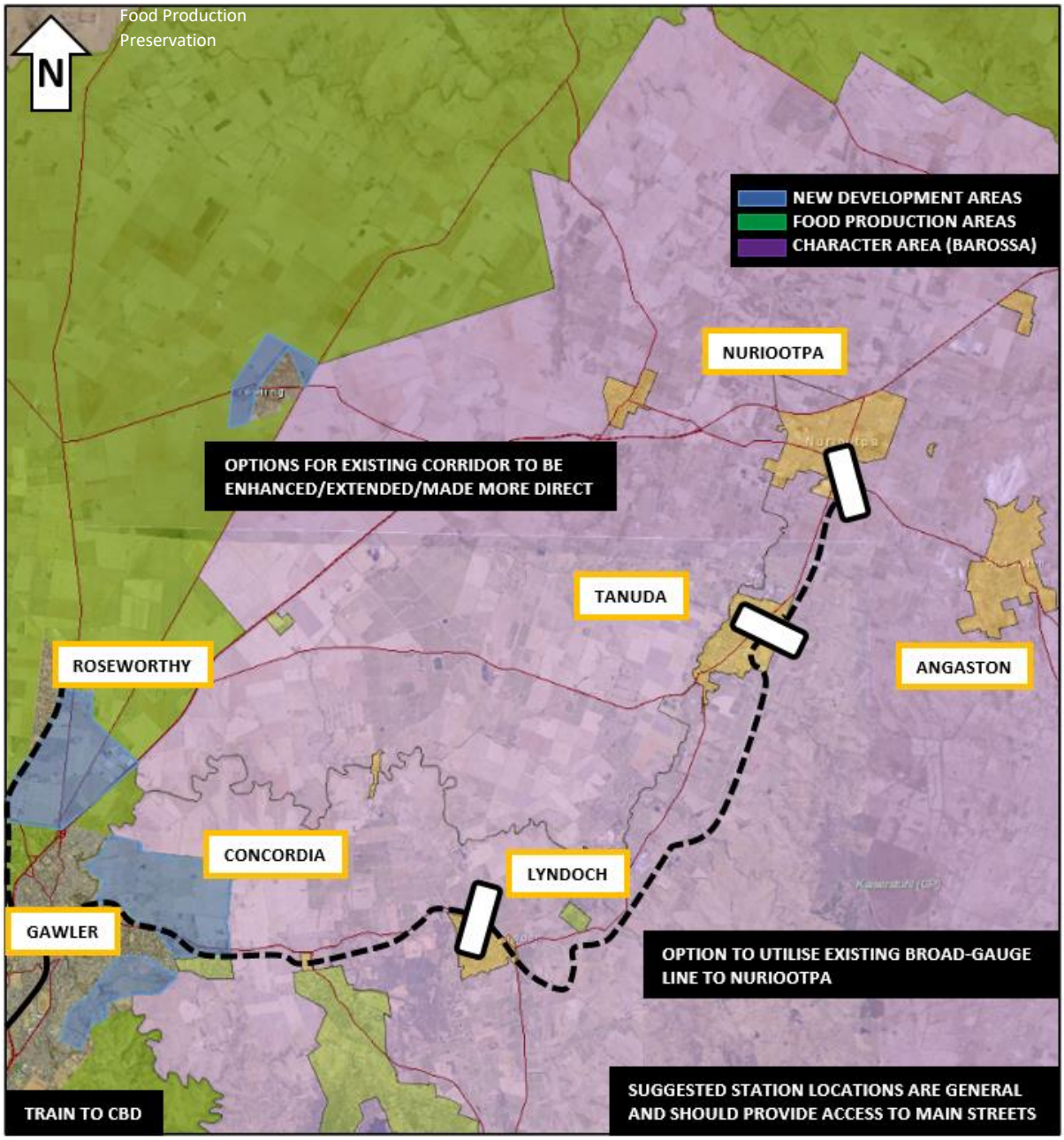

Figure 5: Beyond *Gawler, The Barossa via Concordia* (Map adapted from SAPPA)

5.2.4 Outer Northern Suburbs to LeFevre Peninsula Public Transport for AUKUS Employees

The possibility of providing public transport between outer northern suburbs and the Le Fevre Peninsula in conjunction with the AUKUS Project needs to be investigated. A high frequency bus services could be trialled in the first instance – possibly connecting from the Gawler Railway Line at Dry Creek, Mawson Lakes or Salisbury to the Peninsula. If the service was well patronised, consideration could be given to reinstating passenger rail services between Dry Creek and Port Adelaide.

5.3 Southern Heavy Rail

5.3.1 Adelaide Hills

The current hills population is approximately 80,000. Approximately 50,000 people live along the rail corridor through Aldgate/Stirling, Hahndorf, Nairn, and Mt Barker. The 2020 Land Supply Report for Greater Adelaide contemplates capacity for up to 7,500 new dwellings or 17,000 new residents contemplated in these towns. Growing traffic congestion in the Belair, Blackwood, Eden Hills, and Craigburn Farm areas, competition between cars, bikes, and buses on main roads along with problems associated with road widening means public transport operating on its own right of way makes rail an important future option.

Undertaking a trial of both standard and variable gauge passenger rail to Mount Barker is a priority within this term of Government. Several studies have emphasised the complexity and challenges of serving the growing Adelaide Hills community with quality public transport. Verifying baseline travel times utilising existing rail infrastructure is the essential next step.

Modest, inexpensive modifications to rolling stock and rail infrastructure could be prioritised in the first instance to enable a comprehensive operational trial.[35] Patronage and operational options will take time to fully understand, TAN is recommending a two-year trial of passenger services once initial operational trials have been undertaken.

A reinstated rail service can serve residents travelling both to the CBD and between major townships in the Hills. When combined with an Underground CBD loop, Mt Barker residents would have significantly greater access across the metropolitan area.

Long-term investments into the Adelaide Hills rail network could benefit passenger rail, freight, and The Overland, and could lead to passenger services being expanded along the Adelaide-Melbourne corridor, such as to Murray Bridge.

Investment in Adelaide Hills rail can also address the critical issues of air pollution, road safety and traffic congestion in Hills townships as well as on Glen Osmond Road, Cross Road, Portrush and Hampstead Roads, and the South Eastern Freeway.

Evidence given to the Select Committee on Public and Active Transport indicates that the issues identified in the Infrastructure SA 2022 report *Mount Barker Mass Transit* can be addressed.[36] Along with the initial trial, TAN recommends a comprehensive analysis of long-term rail options to Mount Barker inclusive of scenarios assuming the construction of an Adelaide Hills Freight Rail Bypass, and the subsequent conversion of dual passenger tracks between Adelaide and Belair to a unified gauge.

Upgraded bus services (already proposed) and bus priority lanes including the possibility of tidal flow, remain important irrespective of the train trial - especially along the South Eastern Freeway and Glen Osmond Road. It is understood that bus services are particularly badly affected by congestion along Glen Osmond Road at peak times.

5.3.2 Seaford Line Extension (Figure 6)

The current population between Seaford Station and Sellicks Beach is approximately 28,000. A further 11,000 people reside in McLaren Vale and Willunga with capacity for up to 9,000 new dwellings or 20,700 new residents contemplated in these towns in the 2020 Land Supply Report for Greater Adelaide.

Extending the Seaford Line south is a priority given the significant development occurring in Aldinga and proposed future development at Sellicks Beach. The rail extension will provide rapid transit between Seaford and Aldinga and should integrate with existing bus and bike routes in the area.

The State Government is to be congratulated on securing the rail corridor to Aldinga. It is imperative that they now move to secure a corridor through to Sellicks.

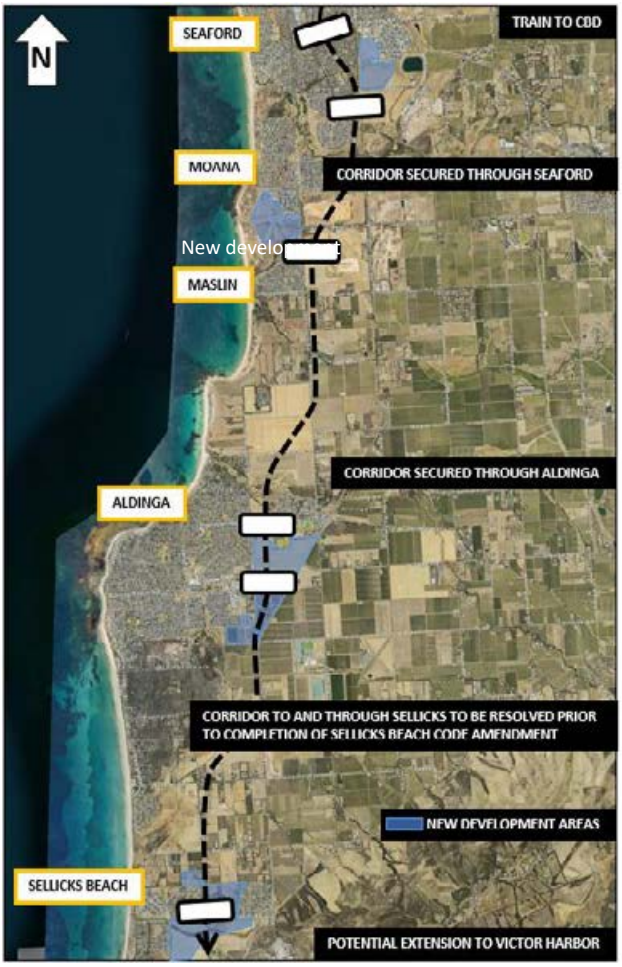

Figure 6: *Extension of the Seaford Line, Aldinga, Sellicks Beach and beyond*(Map adapted from SAPPA)

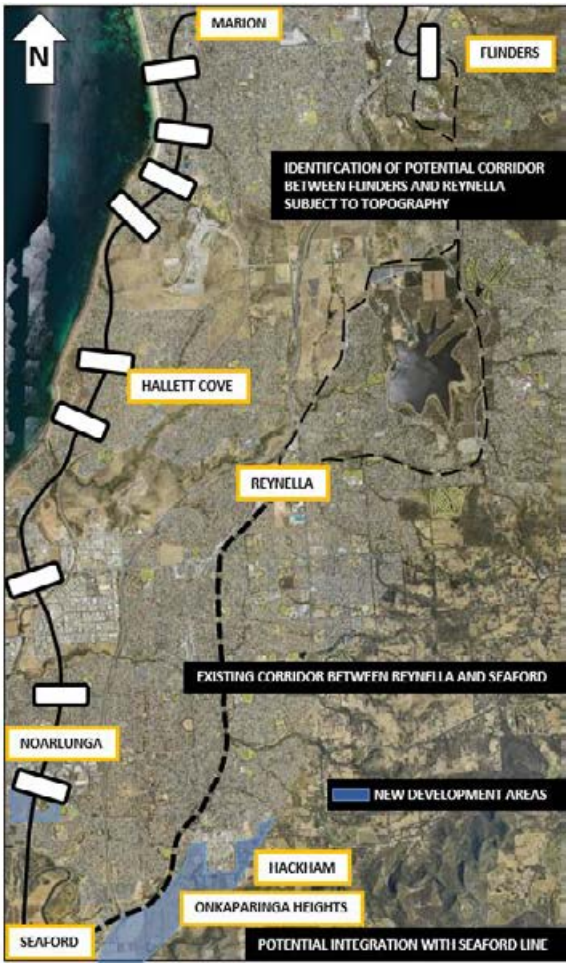

Figure 7: *Investigation into extending the Flinders Line/Reactivation of Willunga Rail Corridor* (Map adapted from SAPPA)

Photo 4: Heavy rail, Seaford, South Australia (Tom Wilson)

5.3.3 Victor Harbor to Goolwa

Current Population 28,500 - capacity for up to 14,000 new dwellings or 32,000 new residents contemplated in the 2020 Land Supply Report for Greater Adelaide.

Planning for the rail extension to Aldinga and beyond to Sellicks must consider the identification and reservation of a corridor for a longer-term extension to Victor Harbor via Sellicks Hill and Hindmarsh Valley. Such a route would be substantially more direct than the old route via Strathalbyn and likely competitive with road travel time.

Provision should also be made in the near future for:

- Regular public transport (buses) from the rail head (whether Seaford or Aldinga) to and within Victor Harbor through to Goolwa.
- Regular public transport along the coast between Victor Harbor and Goolwa.
- Consideration that the above services are provided by Adelaide Metro.

5.3.4 Flinders Line Extension (Figure 7)

The former Willunga railway south of Old Reynella serviced many inland suburbs. The reactivation of the Willunga rail line alignment could be achieved by:

- extending the Flinders Line over or through the escarpment to Old Reynella, then re-joining the original rail corridor south of Old Reynella and as far as Onkaparinga Heights, potentially re-joining the Seaford Line near Seaford Meadows.

The potential route south of Flinders has not been more seriously considered due to the substantial assumed cost of earthworks or tunnelling involved. TAN recommends that a study of a potential route designed for modern lightweight rolling stock be carried out, and that the rail corridor south of Old Reynella be retained for potential future use of such a railway.

6. Re-considering Light Rail/Tram

TAN supports the objectives of the previous AdeLINK plan and recommends the continued investigation of introducing segregated tram and light rail routes on sufficiently wide streets (e.g. CBD, North Adelaide) and where there are existing strategic corridors (e.g. Airport via Keswick Creek).

Light rail's greatest attribute is its adaptability; being able to seamlessly transition from a dedicated corridor to a mixed-street environment, enabling the deployment of light rail directly into commercial centres, high patronage areas, and through otherwise impermeable urban fabric. Whilst dedicated corridors for light rail are preferable where possible, the limited deployment of light-rail into mixed-traffic environments should be seen as a valuable tool to enable enhanced public transport in circumstances where it would otherwise not be feasible (as it currently does in Glenelg). Improving tram technologies that permit a combination of power sources negates the need for an entire route to be serviced by catenary wires. This allows a wireless light-rail solution in a variety of locations, such as through Grange Golf Course, Port Adelaide or along Semaphore Road.

Developments in trackless tram technologies are promising although they will be challenging to integrate into conventional tram networks. It is important to monitor trials currently taking place in other cities.

6.1 Adelaide Airport and Inner-West (Figure 8)

Adelaide Airport currently generates ~50,000 vehicle trips per day. Accommodating just 20% of these trips (10,000) on light rail would be equivalent to the combined patronage of the Outer Harbour and Grange lines and it would significantly reduce local congestion. Importantly, daily trips to the airport are projected to grow to 126,000 by 2039. This growth will substantially increase congestion in the inner west without a high-quality public transport solution.

Existing bus services facilitate only around 1% of trips to and from the Adelaide Airport (despite also being patronised for their local connectivity exclusive of Adelaide Airport) and it is proposed that a light-rail service along a dedicated corridor would offer a more intuitive, attractive, dependable, comfortable (incl. with baggage) and better integrated service which would drive substantially greater patronage.

In light of challenges of delivering such a service along Henley Beach Road or Sir Donald Bradman Drive, TAN proposes that consideration is given to an alternate route which branches from the existing Hindmarsh line in the vicinity of the new Women's and Children's hospital, travels over Henley Beach Road to connect with James Congdon Drive, crosses South Road in the vicinity of an already proposed signalised intersection and travels along the existing Keswick Creek alignment, which could potentially be upgraded in the process.

A high-quality, high-frequency, light-rail connection between Adelaide Airport and the CBD would offer a convenient, comfortable, highly prominent, and highly-patronised service for tourists, business travellers, international students, as well as western suburbs locals.

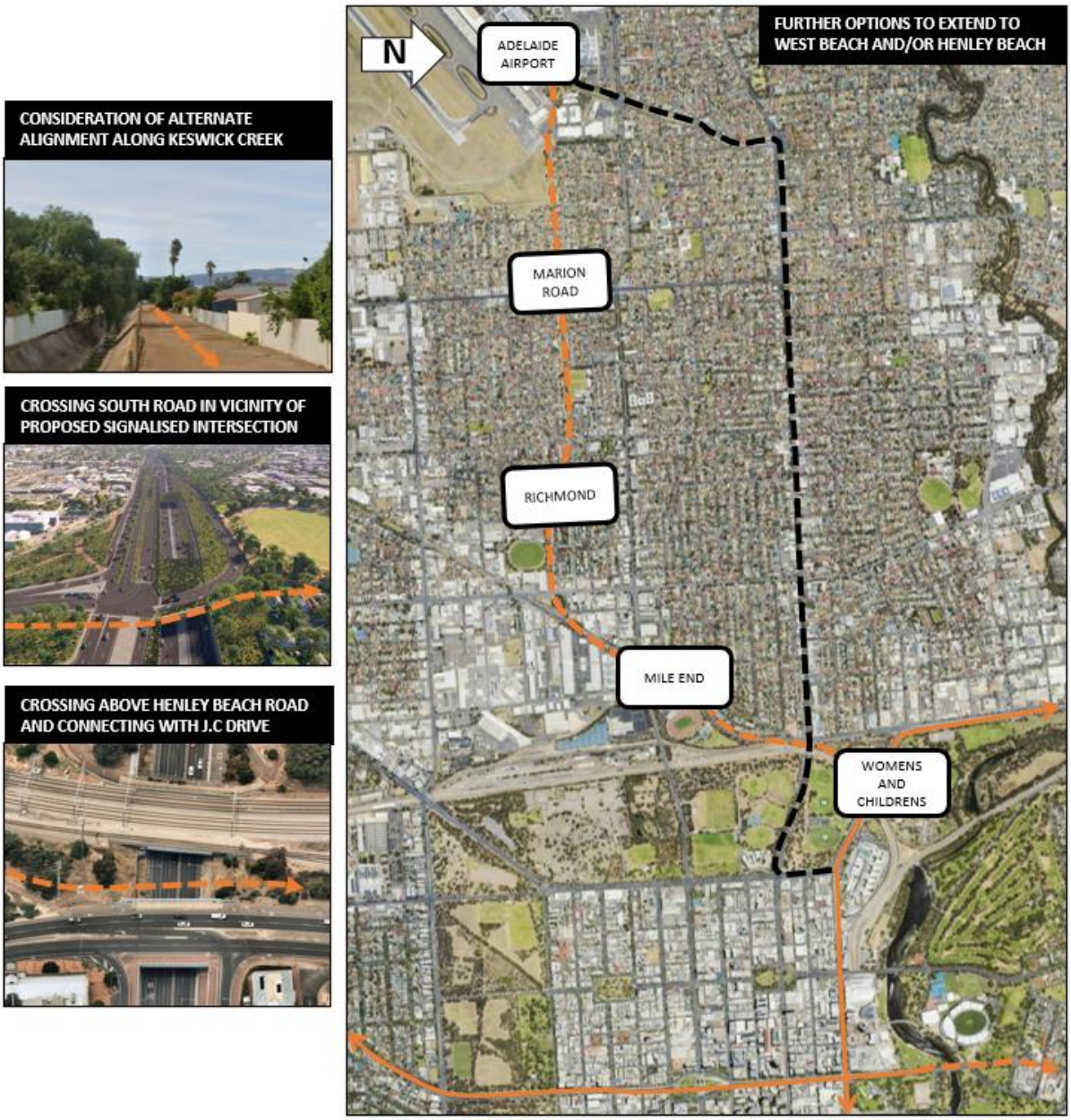

Figure 8: *Adelaide Airport and Inner West - Connecting to North Terrace and New WCH/RAH (Map adapted from SAPPA)*

6.2 North Adelaide and Beyond (Figure 1)

Review the future of the Festival Plaza tramline. Investigations should include extensions to:

- Adelaide Oval
- North Adelaide – O'Connell Street
- North Adelaide – near Aquatic Centre
- Blair Athol via Prospect Road
- Gepps Cross via Main North Road
- Ovingham Station to better serve the Aquatic Centre and link the Gawler Line with North Adelaide.

6.3 Northwest – Outer Harbor and Grange (Figure 9)

TAN is aware that the Government is engaging a consultant to advise on the replacement of the remaining 3000 Class diesel electric rail cars used on the Outer Harbor, Grange, and Belair lines. The investigation into vehicle propulsion is an ideal time to review and improve the routes and services operated.

TAN recommends a thorough investigation of replacing heavy rail with light rail on the Outer Harbor and Grange lines. This should be completed before further work on the heavy rail spur to Port Adelaide is completed to ensure future compatibility. TAN suggests replacing trains with light-rail on the Outer Harbor and Grange Lines would be ideal, regardless of their power source, as light rail is likely to have the following **unique benefits**:

- Potential for improved rail access throughout the port centre and across the port area by including the new Port Spur as part of the light rail conversion and extending the line along St Vincent Street, potentially rejoining the existing rail route at Glanville. Alternatively, the light rail could divert from the existing line near the Commercial Road Station (but at ground level) and operate along both Commercial Road and St Vincent Street. Either of these routes will improve access into the port centre from LeFevre Peninsula.
- Potential for improved rail access to Grange Jetty and Esplanade (similar to Glenelg) by running on-street in Grange through to a new terminus in this location.
- Potential for the return of rail to Semaphore, by branching from the Outer Harbor via Port service at Glanville.
- Flexibility to divert or extend from the existing rail corridor into mixed traffic environments allows greater permeability into the areas being served, and potential to generate additional value out of the existing rail corridor.

- Full integration with the existing CBD tram network, with options to connect into existing Hindmarsh Terminus, as well as into King William Terminus via Adelaide Oval.
- There is some concern with replacing heavy rail with light rail with regards to speed, comfort, and capacity, so it is important to consider the following:
- Trams are currently available that are suited to longer distances, higher speeds and greater comfort – many trams around the world operate at greater average speeds than the current Outer Harbour line. Unlike trains, it is common practice for trams to bypass stops where there are no passengers wishing to board or alight.
- It will be possible to run a combination of all-stop and express services and ensure options for service transfers at key stations.
- Additional travel time through limited sections of on-street running (Grange, Port, Semaphore) would in those instances be balanced by more direct passenger access to those destinations, and would not negatively impact the speed of the services otherwise.

The current Outer Harbour and Grange services accommodate about 10,000 passengers per day. Some tramlines in Melbourne carry up to 40,000 per day.

Figure 9: *Conversion of Outer Harbour and Grange Lines to Light Rail, extensions in Grange, Port Adelaide and Semaphore, full integration with existing CBD tram network.* (Map adapted from SAPPA)

6.4 Southeast

A successful trial of the Mt Barker rail line could lead to an investigation of a modern interchange (incorporating the existing heritage building) at Mitcham Station where passengers can seamlessly transfer to buses or trams for travel to non-CBD destinations.

7. Buses

A comprehensive review is required of the Adelaide bus network that includes access to and conditions at stops and interchanges. It must be followed up with ongoing evaluations of the network to ensure changes are meeting the needs of passengers and growing patronage. Local residents are best placed to identify service improvements. That said, we propose the following recommendations based on discussions with local politicians and members of the community.

- Improve transfers and ensure seamless integration with rail and tram services, for example by buses and trams sharing the same platforms (e.g., across the platform transfer) where possible, provide weather protection for transferring passengers and do not require passengers to transfer across roads.
- Increase safety for public transport passengers both on services and around stops and interchanges, particularly at night.
- Go Zones
    - Increase frequencies and limited-stop arrangements along existing and new or extended Go Zone bus routes. New Go Zone bus routes could include Sixth Avenue (St Peters), Fullarton Road, Main South Road, and Beach Road (to Noarlunga Centre).
    - Extend operational times of Go Zones into evenings and weekends - particularly on roads with high levels of activity and/or to large activity centres such as along Port Road, Torrens Road, Churchill Road, Prospect Road, Main North Road (to Gepps Cross), Hampstead Road (not only to Lights View but also to Ingle Farm), North-East Road, Payneham Road, The Parade, Glen Osmond Road, Unley Road (to Mitcham), King William Road, Goodwood Road, and Henley Beach Road (to Henley Beach).
    - Progressively implement peak hour bus priority lanes on arterial roads, e.g., Anzac Hwy, Golden Grove Road.
- Combined City of Adelaide and State Government Concept Plan for Currie / Grenfell Street High Frequency Bus Corridor, to identify long-term opportunities to improve accessibility, weather protection and on-street amenity for bus users. Investigate the potential inclusion of an east-west bike route.
- Provide traffic signals that prioritise buses at locations where buses have difficulty making right turns, or where the bus route must change from its normal route at peak times, or buses have to follow an extended, inconsistent and inconvenient route (e.g., Grant Avenue / Portrush Road, Dulwich Avenue / Fullarton Road, and Dunrobin Road / Brighton Road).
- Investigate key routes for increasing bus frequencies especially at night and on weekends. This improvement could be expanded to more services over time.

- Improve inter-suburban access, particularly between outer suburban and peri-urban centres. For example:
    - extend O-Bahn services into new suburbs to be developed north of Greenwith and Golden Grove,
    - improve bus links from Golden Grove to Mawson Lakes, Salisbury, Elizabeth, and Lyell McEwan hospital,
    - improve east-west link between Two Wells and Riverlea to Salisbury, Elizabeth and Gawler,
    - introduce an Adelaide Metro bus service to operate between Tea Tree Plaza, Lobethal, Mount Pleasant and Springton, including associated school bus services (including links from Mount Pleasant to the Barossa Valley),
    - extend the Adelaide Metro area to include Mannum, Murray Bridge and Strathalbyn, and operate normal bus and school bus services in that area as Adelaide Metro services (thus avoiding the double-ticketing system on buses in the area), and
    - extend the Adelaide Metro area to include Goolwa and Victor Harbor, and operate normal bus and school bus services in that area as Adelaide Metro services.
    -
- Improve public knowledge of the bus network with easily available hard copy (such as pocket maps as in many other cities) and digital information. Re-establish at least a small public transport information service near the heart of the bus network which is located at King William and Grenfell/Currie Streets. Provide signage including maps and timetables at all high-use public transport stops and stations. Many passengers do not or cannot use digital information.
- Improve wayfinding to bus stops (tram stops/train stations) with design cues and signage.
- Increase funding to local governments to ensure walkability to local bus stops and interchanges. For example, by addressing the backlog of footpath maintenance, up-grading and widening footpaths within public transport catchments, improving legibility of walking routes, cycling/micro-mobility routes and greening/tree planting of verges.
- Provision and funding of bus shelters should not be left to advertisers or local governments. The Department for Infrastructure and Transport needs to take a greater role in providing shelters and on-time service information.
- Provide safe routes and secure bicycle/PMD facilities at major public transport stops and stations – with bike hire/repair services at the largest centres.

Localities identified in the Planning and Design Code for high concentrations of activity and intensive development such as the Urban Boulevard, Urban Corridor, Township Mainstreet, Suburban Activity Centre and Business Neighbourhoods zones should be prioritised for high frequency public transport services.

Photo 5: Bus-rail interchange, Smithfield, South Australia (Tom Wilson)

8. A Fairer Fare System

Adelaide Metro's exclusively tap-on fare system is simple in operation, but leads to fare inflexibility which may constrain the effective growth of the public transport network in the long term.

8.1 Short Distance Fares

TAN suggests the current fare structure discourages short-distance trips, with passengers travelling locally (such as from Seaford to Noarlunga) charged the same fare as passengers commuting to the CBD (such as from Seaford to Adelaide).

The short distance fare structure could better incentivise living locally in a variety of ways; through reintroduction of the two-section fare, or through introduction of a tap-off system with reduced fares for limited distance travel or travel which does not end in the CBD.

8.2 Long Distance Fares

TAN acknowledges that substantial expansion of the suburban rail network to the extent described in this submission would take many years. It is important that in the interim, public transport patronage in the commuter belt beyond the Adelaide Metro area is encouraged by supporting measures that will lower costs and deliver more frequent services.

TAN proposes that the Adelaide Metro ticketing system and more frequent, integrated services, should be progressively provided as far out as Two Wells, the Barossa, Mannum, Murray Bridge, Strathalbyn, Goolwa, Victor Harbor and Normanville. Currently, many of these towns have only limited services operated by Link SA.

TAN proposes that an immediate improvement would be to equip Link SA buses with Adelaide Metro readers, which could either charge the full applicable fare, or could be utilised purely as a free tap-off function that enables free interchange with Adelaide Metro services.

TAN does not expect typical Adelaide Metro service frequencies to be provided initially to all regional towns within Greater Adelaide, but rather that existing service frequencies are supported and increased to encourage progressively greater patronage until expansion of Adelaide Metro services is warranted.

8.3 Emerging Opportunities

Mobility as a Service (MaaS) models provide an opportunity for Adelaide Metro to work with micro-mobility and share vehicle providers to expand the reach, patronage and return on investment of the public transport network. MaaS and other share vehicle providers (e.g., cargo-bike share, local community initiatives) can be integrated into mixed use developments at train stations and interchanges.

9. Public Transport: Meeting the Challenges

It is inconceivable that our major land use, transport, and infrastructure agencies are not planning for major improvements and investments in public transport infrastructure and services over the next 20 years. Perth, Brisbane, Sydney, and Melbourne have made and/or are making substantial investments in public transport infrastructure and services. These are the Capitals that have grown at a significantly greater rate than Adelaide (and Hobart) over the past 50 years.

The challenges we face in terms of environmental sustainability, equity within and across generations, housing supply and affordable living, aging of the population, personal health, amenity, liveability, attracting industry investment, and retaining a skilled workforce all demand a sophisticated approach to transport. TAN's *Greater Adelaide Public Transport: A Network for 21st Century Challenges* provides a strong starting point for our key agencies to review, plan for, and invest in a quality public transport network that will set us on the right track into the second half of this Century.

Transport Action Network

The Transport Action Network (TAN) comprises community organisations, active and public transport advocacy groups, urban and transport planners, practitioners, and researchers concerned for the future of sustainable transport and land use integration in South Australia.

Acknowledgement

The authors would like to acknowledge the significant contribution made by TAN network members in creating the *Public Transport Discussion Paper* and this follow up position paper *Greater Adelaide Public Transport: A Network for 21st Century Challenges*.

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[1] In 2016/17, the reporting term shifted from 'initial boardings' to patronage and it is unclear whether 'patronage' refers to combined initial AND transfer boardings.

[2] For example: Adelaide Plains Council (nd) *Adelaide Plains Council Strategic Plan 2020-2024*; Mount Barker District Council (nd) *Integrated Transport Plan Lead Strategy*; Town of Gawler (nd) *Gawler Community Plan 2017-2027*; City of Victor Harbor (nd) *Community Plan 2030*.

[3] DCCEEW (2022) Australia's Emissions Projections - 2022. Canberra, Page 9: DCCEEW; DCCEEW (2023) National Electric Vehicle Strategy. Canberra: DCCEEW

[4] DCCEEW (2022), Page 10.

[5] Excluding cars and SUVs used as commercial vehicles.

[6] DEW (2021). Report on the operation of the *Climate Change and Greenhouse Emissions Reduction Act 2007* (South Australia); DEM (2023) South Australia's Green Paper on the Energy Transition. Adelaide: Government of South Australia. Based on DCCEW (2022, p. 37) figures indicating passenger vehicles accounted for 45% of emissions in 2019. This figure excludes cars and SUVs used for commercial purposes (LCVs). LCVs and passenger vehicles combined account for 62% of South Australia's GHG emissions or 3.9Mt.

[7] Assuming the South Australian fleet growth rate is in line with the national rate. BITRE (2023) Identified a national growth in the passenger fleet of 1.8% from 2022-2023 (Page 5). This is consistent with average growth over the previous decade of 1.7% or 19,720 vehicles per year (BITRE 2022, Table 6.9b).

[8] DCCEEW (2023). Page 2.

[9] DCCEEW (2022). Page 39. This figure is at odds with the South Australian Department of Energy Mining Figure which used a 2020 forecast of 40% of vehicle sales being BEV or PHEV by 2030. DEM (2023) South Australia's Green Paper on the Energy Transition, DEM: Adelaide.

[10] New car sales for 2022 were 1,081,429 vehicles (Australian Automotive Dealer Association - https://www.aada.asn.au/bulletins/2023/01/06/2022-new-car-sales-results-released/). Assuming South Australia's share of Australian new vehicle sales remains at 6% (based on BITRE new vehicle sales by State for 2017-18 – the latest available). The share of new car and SUV sales for 2022 is just under 65,000 vehicles. Assuming this rate remains for the foreseeable future, it would take until 2050 to reach a car fleet with net zero operational emissions.

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[12] Based on BITRE 2022 year book, Table 6.12.d

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[23] See the systematic review of studies in Bucsky, P., & Juhász, M. (2022). Long-term evidence on induced traffic: A case study on the relationship between road traffic and capacity of Budapest bridges. *Transportation research part A: policy and practice*, *157*, 244-257.
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[34] Infrastructure SA (2020) *20 Year State Infrastructure Strategy*. Infrastructure SA: Adelaide p. 125
[35] See for example, Rod Hook & Associates (2021) *Rail Public Transport Options for Mt Barker and the Adelaide Hills*.
[36] See transcripts of hearings and submissions to the Select Committee on Public and Active Transport from Gary Field, Mt Barker Residents Association, South Australian Transport Action Group. For broader support of the rail network see the submission from the Transport Australia Society. District Council of Mt Barker has questioned the scope of the Infrastructure SA report and is calling for detailed, comprehensive investigation of rail options to Mt Barker.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 2:07 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: UniSA-STEM-and-Creative-Academic-Units-collective-commentary-6-nov.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Other
Given name:	Debbie
Family name:	Frisby
Organisation:	UniSA
Email address:	[redacted]
Phone number:	[redacted]
Comments:	This submission is a collective of comments from a group of academics and students across a number of disciplines: UniSA STEM and Creative Academic Units collective commentary Collective commentary of a groups of academics from UniSA: Dr Johannes Pieters: Program Director, Urban and Regional Planning, UniSA Creative Debbie Frisby: Program Director, Construction Management, UniSA STEM Dr Chris Brisbin: Program Director, Architecture UniSA Creative Shadi Shayan: Course Coordinator, Construction Management, UniSA STEM Dr Andrew Allan: Senior Lecturer, Urban and Regional Planning, UniSA Creative Sonali Pandithawatta: Course Coordinator, Construction Management, UniSA STEM Dr Sadasivam Karuppannan: Senior Lecturer Urban and Regional Planning UniSA Creative Dr Shokry Abdelaal: Program Facilitator: UniSA Online, Green Building Council Australia Undergraduate student: Bachelor of Construction Management (Honours)
Attachment 1:	UniSA-STEM-and-Creative-Academic-Units-collective-commentary-6-nov.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 20.8 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

UniSA STEM and Creative Academic Units collective commentary

Collective commentary of a groups of academics from UniSA:

Dr Johannes Pieters: Program Director, Urban and Regional Planning, UniSA Creative

Debbie Frisby: Program Director, Construction Management, UniSA STEM

Dr Chris Brisbin: Program Director, Architecture UniSA Creative

Shadi Shayan: Course Coordinator, Construction Management, UniSA STEM

Dr Andrew Allan: Senior Lecturer, Urban and Regional Planning, UniSA Creative

Sonali Pandithawatta: Course Coordinator, Construction Management, UniSA STEM

Dr Sadasivam Karuppannan: Senior Lecturer Urban and Regional Planning UniSA Creative

Dr Shokry Abdelaal: Program Facilitator: UniSA Online, Green Building Council Australia

Undergraduate student: Bachelor of Construction Management (Honours)

We acknowledge that the discussion paper is a high-level vision for the development of the Regional Plan for Greater Adelaide and we look forward to reviewing a draft plan in 2024.

We would like to offer our views on the paper's insights into impacts on future land use decisions.

These views were developed through a workshop involving participants from the disciplines of Urban and Regional Planning, Architecture and Construction, Sustainability and SMART technologies. We did not set out to comprehensively respond to the questions in the Discussion Paper but rather to provide reflections and potential directions for further evidenced based consideration in the development of the GARP regarding guiding principles, major trends and drivers identified, and the four outcomes for Greater Adelaide.

1. A greater choice of housing in the right places

The discussion paper suggests that decentralization and greenfield development as land use policies will be part of the solution to the housing affordability crisis. Greenfield developments are often brought to market as master planned communities but, as the Discussion Paper suggests, short term advantages regarding housing affordability and access to social infrastructure (assuming it is delivered on time) can soon be overshadowed by recurrent costs associated with car dependency. The purported self-sufficiency associated with master planned communities looks attractive to many people in regional communities who see themselves as living in areas that are less self-sufficient in nature. Recent research prepared for Infrastructure Victoria has identified the extent to which residents are prepared to make trade offs regarding location and these findings may be of interest https://www.infrastructurevictoria.com.au/wp-content/uploads/2023/03/Wallis-Influencing-greenfield-housing-demand-qualitative-research-final-technical-report.pdf

We expect that the measures required to achieve a greater choice in housing will involve decisions regarding the degree of density and housing typologies, and the interplay of the two. In the case of

development along transport corridors it will be important to understand the resulting social, cultural, and economic value of those developments based on type. UniSA academic, Dr Damian Madigan has explored alternative ideas for infill rather than adding more housing or increasing the amount of residential units. His work suggests that infill development is deeply connected to the idea of social cohesion (see https://www.madigan-architecture.com/portfolio/alternative-infill/) .

2. A greener, wilder and climate resilient environment.

Research has been carried out at UniSA on the measurement of green space, the existing models for measurement and distribution and the relationship between green space and health, and we anticipate this data could inform the Greater Regional Plan (see https://www.researchgate.net/publication/297279943_Validating_and_measuring_public_open_space_is_not_a_walk_in_the_park).

You may be aware that Green Star Communities Version 2 is currently in development and deals in part with nature and biodiversity. This work is highlighting the challenge of scalability and identification of quantifiable indicators regarding the evaluation of potential development.

3. Employment trends

The Broad Industry Categories of Traditional, Freight and Logistics, Knowledge Intensive and Population Serving Uses used in the Discussion Paper provides a sound framework for analysing demand for employment lands. As the Discussion Paper suggests, weekly journey to work patterns have been disrupted, perhaps permanently, by Covid 19 public health work from home measures reinforced by enabling technology. This disruption may create a space for further shifts in work/home regimes such as the four-day week.

4. Socially cohesive places

We note the move from the principles of social inclusion and fairness in the current plan to *equity and social cohesion* in the Discussion Paper. We suggest that that the term social cohesion be defined and any overlaps with terms such as social interaction, social capital and social connectedness be clarified (see Mouratidis and Pootingo 2020). In particular we suggest that it would be helpful to understand how the GARP sees social cohesion being supported at street, neighbourhood, metropolitan and city level so that potential solutions through strategic spatial planning can be flagged.

5. Living Locally.

Recent research has shown that approx. 8% of the population of metro Adelaide reside in a 20 minute neighbourhood when access to healthy food, recreational resources, community resources, public open space and public transport were used to operationalize the concept (Thorton et al 2022) This level of access was associated with a dwelling density of 1440 dwellings per square kilometre. We agree that density of development will be important to the success of “living locally” however a transition to this urban form will no doubt require considerable co-design in order to achieve outcomes such as a better job to housing ratio.

6 Public Engagement

We acknowledge that the Planning, Development and Infrastructure Act (2016) includes a Community Engagement Charter, and that global trends continue to develop and promote public engagement, participatory budgeting processes and participatory decision making.

7 Cost, affordability and outcomes

The Discussion Paper provides comparative data on the cost of bringing build ready land to the market and we note and recommend the work of SGS Economics and Planning on this topic (https://www.infrastructurevictoria.com.au/wp-content/uploads/2019/04/SGS-Economics-and-Planning-Comparative-costs-of-infrastructure-across-different-development-settings.pdf)

We endorse the view that the provision of appropriate infrastructure including health care, education, internet infrastructure networks for both greenfield and infill sites will have significant impact on cost which will differ for types of development. Transport infrastructure policy will be informed by diversification of transportation modes such as electric vehicles, autonomous vehicles, electrified public transport modes; by greater emphasis on the health benefits of active transport and by working from home culture. These trends will impact civil infrastructure, investment and supply and the coordination of supply with urban planning. Planning for SMART technology for new development in greenfield areas specifically is reliant on good internet infrastructure. Continued research and development of SMART technologies will be vital contributors to effective and efficient infrastructure and a strong economy.

8 Strategic Planning Standards

In considering the questions in the Discussion Paper it was felt that in addition to participants making comments based on their experience within SA we also propose that it is fruitful to make reference to national standards regarding strategic planning. Consequently we recommend that the review of capital city strategic planning systems undertaken by the COAG Reform Council in 2011 be used to develop the GARP, specifically the list of criteria that the Council recommended should inform a capital city strategic plan (see https://www.linkplace.com.au/coag#:~:text=COAG%20asked%20the%20council%20to,and%20infrastructure%20in%20our%20cities.)

From:	PlanSA Submissions
To:	DTI:PlanSA Submissions
Subject:	Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Date:	Monday, 6 November 2023 4:57:54 PM
Attachments:	UDIA-GARP-Discussion-Paper-Submission.pdf UDIA-Grow-Reform-Build-2022.pdf UDIA-Planning-System-Implementation-Review-Final.pdf EFPA-Review_UDIA-Submission_Final_060821.pdf

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Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Advocacy Organisation
Given name:	Liam
Family name:	Golding
Organisation:	Urban Development Institute of Australia (SA Branch)
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Please find attached submission and appendices comprising the UDIA submission to the Greater Adelaide Regional Plan Discussion Paper.
Attachment 1:	UDIA-GARP-Discussion-Paper-Submission.pdf, type application/pdf, 306.5 KB
Attachment 2:	UDIA-Grow-Reform-Build-2022.pdf, type application/pdf, 7.2 MB
Attachment 3:	UDIA-Planning-System-Implementation-Review-Final.pdf, type application/pdf, 641.6 KB
Attachment 4:	EFPA-Review_UDIA-Submission_Final_060821.pdf, type application/pdf, 704.8 KB
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

UDIA Greater Adelaide Regional Plan Discussion Paper Submission

The Urban Development Institute of Australia South Australian Division (UDIA) acknowledges the extensive time and work that has gone into the preparation of the Greater Adelaide Regional Plan (GARP) Discussion Paper. The UDIA is pleased to provide this submission to support the drafting of the GARP.

This Discussion Paper has been released at a critical time in the State's history, which is in the midst of a housing affordability crisis. It has been regularly acknowledged that the solution to the crisis is to increase the supply of housing. State and Federal Government targets for housing construction over the short term aim to increase housing in South Australia by an annual amount well above our historical average. This is strongly supported by the UDIA.

The State Government also has an ambitious economic growth agenda featuring the creation of new and expansion of existing employment generating industries and transformational infrastructure builds. This agenda, combined with positive housing targets highlight the acute need to plan for the growth of the State. The UDIA supports a robust and well-informed growth strategy.

As the premier development industry representative body in South Australia for over 50 years, the UDIA has a strong history of advocacy and policy reform in the State. We see the following as critical areas for the GARP and provide relevant recommendations in the following sections:

1. Land Supply - Greenfield
2. Land Supply - Infill
3. Infrastructure
4. Skills shortage

We also highlight the need for an approach in a thirty-year plan that includes a longer-term vision for the Greater Adelaide Region past this time horizon. Delivery of housing along with supporting infrastructure and social planning has a lifespan beyond thirty years and it seems natural to assume that future growth will be required beyond the scope of the GARP and long into the future. Through robust forward planning, South Australia will be in the best position to retain residents and build on the State's already strong economy and liveability.

1. Land Supply – Greenfield Development

The solution to the current Housing Affordability Crisis we face (as freely acknowledged by Government) is to increase land supply.[1] Therefore, it is concerning to the development industry that there is such a strong assertion that there is currently a 15-year land supply and as such the Greater Adelaide Regional Plan review does not need to consider transformational changes.

[1] ABC News – 16 August 2023: https://www.abc.net.au/listen/programs/radionational-breakfast/sa-premier-national-cabinet-housing-supply-renting/102733254;
South Australian Government – 17 August 2023: https://www.premier.sa.gov.au/media-releases/news-items/sa-well-placed-to-capitalise-on-national-cabinet-housing-agreement

The UDIA remains committed to ensuring there is a pipeline of development-ready land and has concerns relating to inadequacies in existing land supply measurements. We have previously raised concerns in relation to how land supply is calculated. Whilst it is acknowledged some improvements have been made in this regard, the UDIA questions the accuracy within the Discussion Paper that
'15 years supply is currently available.' Whilst there may be land that is already zoned for residential development in Greater Adelaide, we understand that much of this land is not currently development-ready (i.e. does not have connection to critical infrastructure required to accommodate housing).

The UDIA remains concerned that the methodology used to determine land supply fails to factor in constraints and contingencies that limit land readiness. It is also critical that land supply is distributed across the region and not dependent on a small number of sub-regions, so that new home buyers are not forced to be displaced from their existing communities.

The UDIA is also concerned that the estimated land supply includes land which has servicing challenges, and is also skewed by the assumed supply to be delivered from single large estates (i.e. Riverlea, Dry Creek and Concordia). The reality is land which in essence is controlled by a single developer has a practical delivery constraint with projects of such a nature likely to take 20 years or more to deliver. The issue therefore is that the 15-year rolling land supply targets (in respect to actual land able to be delivered to the market) are not currently being met and will continue to not be met into the future. At present demand is outstripping supply and this is clearly demonstrated by rising housing prices and housing affordability falling to crisis levels.

In addition to land supply, the need for housing choices and diversity is greater now than ever before as evidenced by the data on changing household demographics. The GARP Discussion Paper projects a need to supply 300,000 new homes, a 46% increase in population as well as an anticipated 78% increase in single person households. The UDIA is concerned that without a proactive policy environment the required land supply to meet even these needs will not be met, let alone the land supply required following the announcement of new Federal Government housing supply targets.

Putting issues with land supply methodology aside for a moment, the housing supply targets within the GARP, independent of the land required to deliver them, appear to have already been superseded.

At National Cabinet in August, a target of 1.2 million homes to be built over the next 5 years was set as "*all governments recognise(d) the best way to ensure more Australians have a safe and affordable place to call home is to boost housing supply*."[2]

Based on South Australia's per capita share, the HIA has estimated this equates to 80,000 homes over that period, which will require construction of 16,000 new homes every year to meet that target. This compares to 300,000 new homes over 30 years in the GARP discussion paper, which equates to 10,000 new homes every year, indicating that even since the release of the GARP Discussion Paper there has been an increase in short term supply goals of over 50%.

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[2] Australian Government – 16 August 2023: https://www.pm.gov.au/media/meeting-national-cabinet-working-together-deliver-better-housing-outcomes

Historical averages of annual housing supply range between 9,000 and 12,000 homes per annum, comprised of a mix of detached houses, townhouses, and apartment developments. Detached homes make up the overwhelming majority of this supply, accounting for between 7,000 and 9,000 per annum over the last 30 years.

This means meeting the Federal Government target agreed at National Cabinet will require several thousand additional homes annually over what has been delivered in the past and an increase in delivery of housing beyond what is described as envisaged in the GARP Discussion Paper. In order for South Australia to deliver several thousand more homes (over and above historical averages and current rates) every year for each for the next 5 years to meet its share of the target, land will need to become available in far greater quantities - and in accelerated time frames - than what is currently envisaged.

To emphasise, the GARP forecasts South Australia will require 300,000 additional homes over the 30-year period. With 80,000 required in the first 5 years, clearly the GARP forecast will fall well short of what is required. It is an uncontroversial fact that there is nowhere near enough land available inside the Urban Growth Boundary, or proposed in the current GARP, to enable delivery of these homes.

This shows the need for the Government to have increased capacity to respond to trends, challenges, and opportunities via more frequent reviews. Previous UDIA submissions to Government have highlighted the requirement in Schedule 4(1) and section 7 of the *Planning, Development and Infrastructure Act (PDI)* 2016 that obliges the State Planning Commission to review land supply at least once every five (5) years. We believe the five-year review period is too infrequent.

Consistently the UDIA has asserted that land supply issues combined with changing economic circumstances have caused a housing affordability crisis and these factors make the timeframe for reviews more urgent. Land supply and “development ready” land reports do not adequately factor in critical delivery elements such as infrastructure delivery, approval process delays and the political decision-making process.

These issues were highlighted in the UDIA submission to the Expert Panel coordinating the Planning System Implementation Review (see Appendix B). These items have not been responded to at this time and addressing these issues will be critical to ensuring the GARP review produces outcomes that will support Adelaide’s growth over the next 30 years.

The GARP discussion paper highlights that the vast majority of growth areas for housing are identified in the ‘outer north’ of Greater Adelaide (Figure 1). The lack of a spatial distribution of land supply is highly problematic. The residential housing market in Adelaide is not homogenous and requires different product types, different geographic locations, and different price points to satisfy a cross-section of purchasers.

The Discussion Paper has earmarked the majority of greenfield land supply in the 'outer north' region and within ‘satellite cities’. Whilst greenfield development in these areas is encouraged, the UDIA questions the spatial distribution of land supply and housing across Greater Adelaide.

There appears to be no greenfield developments envisaged within the 'outer south' region beyond the land already rezoned at Hackham and Aldinga. In a High Growth scenario, it is likely there will be increased pressure on housing supply and affordability in the 'outer south' region. It is therefore sought that further development south of Aldinga and of Sellicks Beach and consideration of long-term supply (e.g. Bowering Hill) should be incorporated into the Greater Adelaide Regional Plan.

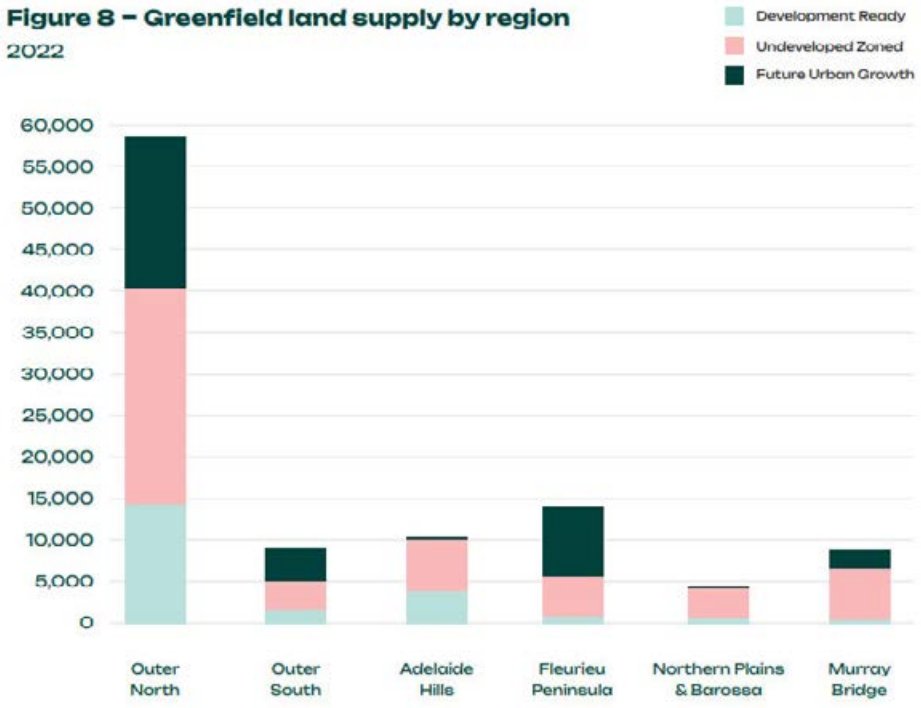

Figure 1: Greenfield Land Supply by Region
Source: SA Government, GARP Discussion Paper

In the past, the simple response to the need for additional land for development in all sub-markets throughout Adelaide – essentially anywhere other than the 'outer north' – has been to place it in the too-hard basket. However, these reasons are largely historical and in appropriate locations there is community support for consideration of land that has long been locked up.

The most recent review of the Hills Face Zone was announced by the then Minister for Urban Development and Planning in October 2002. With no formal process for review, ad hoc approaches have been made seeking to change the Hills Face Zone boundary over the last 10-15 years. However, as far as we are aware, these proposals have been unsuccessful. In appropriate locations with a set of defined criteria, land in this zone may contribute to meeting the 15-year land supply targets at a sub-market level.

The UDIA is aware of community support for a fresh consideration of Hills Face Zone boundaries and amendments in other locations in the Environment and Food Production Area (EFPA). This includes from the industry association AUSVEG SA who note the blunt instrument that is the legislation does not necessarily support the goals of all the industry.

With the challenges of identifying land for development across Greater Adelaide, it is important that this review does not instantly discount land merely because it has not been considered for an extended period of time. By its actions so far, the Government has shown it understands the need for land supply is urgent.

Previous UDIA submissions have called for a land supply dashboard and such a dashboard would support analysis of sub-markets in Adelaide. The Government is to be congratulated for accepting this recommendation and is developing the dashboard. It has been announced previously that the dashboard will be launched in the 2023/24 financial year.[3] In addition to taking a different approach to land supply to recognise the importance of these sub-markets and establishing land supply pipelines to support these markets, the UDIA also calls for the Land Supply Dashboard to be released as a matter of urgency. The release of this dashboard will improve transparency and support development activity with timely and accessible data.

The UDIA would welcome more detailed land supply modelling that demonstrates how and when land will be available for intended development. The State Government is encouraged to consider infrastructure planning in conjunction with the GARP to ensure infrastructure that supports land availability is delivered in a timely, coordinated, and equitable way.

The UDIA recommends that existing land supply reports be more specific and transparent regarding the availability of 'development ready' land. For example, by mapping land that is currently available for development, land that will be ready in 2 years, ready in 2-4 years, ready in 5+ years etc and identifying what is needed by way of infrastructure or strategic planning to deliver the land.

With the need for an additional 300,000 homes and land to supply these homes the UDIA supports a strategic planning outcome that will support and facilitate the delivery of land for residential growth.

While some action has been taken at the start of this year with the Government's land release as part of its Better Housing Future policy, the land release has not yet led to improved housing affordability. The reasons for this are clearly related to the work that remains to be done to convert this identified land into land that can actually have houses built upon it.

The UDIA recommends adding a serviceability lens to the Land Supply Dashboard as this will provide a more complete picture of what land is indeed contributing to the important competitive market tension that drives housing affordability.

This leads to the industry's position that there is not an actual 15-year *market ready* supply of land. The consequence of this lack of a 15-year market ready supply of land is the current Housing Affordability Crisis. The critical importance of the 15-year rolling land supply is that it is fundamentally linked to legislative requirements for the identification of further land for growth through the EFPA.

Given the time it takes to get land to market through rezoning and infrastructure processes, adding the political element of legislative change or land identification through quinquennial reviews threatens significant delays to the release of land that threaten a functioning land supply pipeline. We strongly encourage the Government to reconsider the 15-year test. The current infrastructure crisis that is threatening development in the outer north of Greater

[3] https://plan.sa.gov.au/state_snapshot/better-housing-future/land-supply-dashboard

Adelaide strongly suggests that a longer time horizon is needed as SA Water funding is also constrained by the Essential Services Commission of South Australia (ESCOSA) process that also occurs too infrequently. This will be considered in further detail later in this submission.

A substantial amount of information on this matter is included in the UDIA submission to the State Planning Commission on the review of the EFPA (see Appendix C). It is noted that elements of this review were addressed by the Government and that this resulted in the Land Supply Methodology review in August 2022. We applaud the Government for this review and hope that further consideration will be given to the outstanding matters.

2. Land Supply - Infill

With an acute need for the urgent provision of housing, opportunities for delivery of a range of housing types within existing urban boundaries must also be investigated, supported, and promoted. Furthermore, reforms that support the GARP to enable the free functioning of the market and the capacity for people to better match their housing to their circumstances should be considered, particularly further stamp duty relief as the UDIA has previously called for in the grow.reform.build paper (see Appendix A). The Government's 2023/14 State Budget recognised the value of Stamp Duty reform in delivering improved housing outcomes and further reform of this regressive tax should follow.

Opportunities to identify and unlock land supply for infill development rely more on setting of targets and creation of an authorising environment which is more conducive to growth, rather than the identification of suitable land to facilitate greenfield development. The underpinning need for more housing is, however, consistent for both forms of development. As such, this section will focus more on the elements of targets and types of infill development.

Central Business District Population Targets

The projected population targets for the CBD are bold and will need progressive and forward-thinking initiatives to be realised. A bigger capital city can further the revitalisation of the heart of the Greater Adelaide region and is a necessary step to drive Adelaide as a global city and a great place to live and work. The ambition for a more densely populated city centre and the many benefits this additional population can bring to the city itself as well as the broader metropolitan area is supported.

Strategic and General Infill

The UDIA notes there is a focus on strategic and general infill sites in the Greater Adelaide region. The UDIA is strongly supportive of strategic infill and firmly believes strategic infill should be the Government's preferred form of infill development and should facilitate a system which reflects and promotes strategic over general.

More should be done by the State Government to effectively allow for strategic master planning in the inner metropolitan suburbs to support growth. This will allow for development to be delivered efficiently providing greater certainty for both developers and those in need of housing.

The UDIA is generally supportive of increased height provisions, especially in those areas such as Urban Corridor Zones and Strategic Infill sites. The UDIA acknowledges and

promotes the need for increased density in the inner metropolitan area of Greater Adelaide, in particular through increased height and density.

As a general statement in terms of both infill and greenfield development, diversity in housing choice needs to be supported, with diversity including:

- Housing type and size;
- Housing options allowing for a range of demographics and abilities in the same area;
- Housing for aging allowing downsizing in the same suburb; and
- Affordable housing options, including build to rent housing typologies.

The UDIA is supportive of development in the land surrounding the parklands and incentives to encourage development in this area. The UDIA are also supportive of strategic infill on a smaller scale to allow for better planning outcomes on repurposed sites. Further conversation is needed about how to unlock medium to higher density projects in appropriate areas.

3. Infrastructure

Infrastructure provision is fundamental to achieving the urban growth anticipated in the Discussion Paper whether it is in greenfield or infill areas. As such, infrastructure planning and delivery must be a key focus for the State. Critically, the industry and community require certainty that key infrastructure will be delivered in a timely, coordinated, and equitable manner. With the housing affordability crisis and lack of both social and affordable housing, the community and industry need certainty that key infrastructure will be built to enable the completion of these much-needed developments.

Clarity on the strategy for infrastructure delivery is required to provide developers with certainty to plan and invest in new development. Without this certainty, the State is at risk of losing key strategic development projects.

Previous UDIA submissions have highlighted that all of society benefits from new infrastructure. Even those far away from a new piece of major transport infrastructure may indirectly benefit, while those living, working, or investing in close proximity benefit both directly and indirectly.

The current challenges facing the state are the consequences of early identification and adequate scoping of urban infrastructure that has been lacking for an extended period of time. Our previous recommendation to address this, that a single designated authority be tasked with the early planning and scoping of urban infrastructure for growth areas, has been recognised by Government with the recent establishment of the Housing Infrastructure Planning and Development Unit (HIPDU). We welcome Government taking this action and we hope to see this unit forcing Government agencies to coordinate and act on the urgent infrastructure needs facing our state.

Systemic issues still exist however with the ESCOSA quadrennial review of SA Water charging. This creates a structural constraint on growth infrastructure expenditure. Additionally, ESCOSA places significant prioritisation on existing SA Water customers over adequately providing for growth. The infrastructure provision crisis in the 'outer north' of metropolitan Adelaide makes clear that the current arrangements must be changed. A

funding process that has greater focus on the necessity of growth and flexibility to respond to changing conditions is essential to resolving some of the issues with SA Water infrastructure provision.

It is notable that the current GARP review is occurring along a similar timeframe to the South Australia 20-Year State Infrastructure Strategy Discussion Paper. It is encouraging in that it is hoped there will be integration between land use planning and infrastructure planning. In order to make this a success, the UDIA recommends Government explicitly allocate responsibility for this integration and coordination to a single agency and a single Minister.

Beyond being required to enable the orderly development of land for housing, infrastructure planning also plays a key role in efficient development and is also a key factor in housing affordability. As such, it is concerning that the GARP Discussion Paper produces an infrastructure costs comparison table that was not comparing developments of a similar type in different locations, but instead appeared to be attempting to engineer a particular outcome. Understanding relative infrastructure costs is far too important for the comparisons of 1-3 bedrooms developments in one location to be implied as equivalent to 3-4 bedrooms in different locations.

Furthermore, the costs excluded from the comparison include demolition works and environmental issues, in particular contamination, that in the words of the Infrastructure SA note “are likely to be more prevalent in inner area locations and projects.” While these costs are excluded, civil works, including all roads and stormwater within, and intersecting with, the development area, as well as earthworks, lot benching and retaining walls for lots are included in the table and can represent one of the largest costs for developers. Once again, this choice to include costs for civil works skews the comparison in favour of infill over greenfield development.

With principle 7 of the Commissions considerations for identifying land for housing and jobs being “*Identification and prioritisation of growth areas will be based on the transparency of costs to community (infrastructure provision, housing cost, ongoing living costs, climate change resilience costs) for differing forms of supply*,” it is essential that this transparency is based on equal considerations. It is also important that the State’s responsibility for trunk infrastructure is identified in advance, planned for, and funded.

Returning to the Land Supply Dashboard, transparency of infrastructure plans and an integration of these plans into the Land Supply Dashboard can aid the appropriate identification of sufficient land that is developable and can support the needs of the State.

Finally, infrastructure should be delivered to underpin a market driven efficient urban form. This will support development in all areas of Greater Adelaide and will support the sub-market considerations outlined in the land supply section. This will move Adelaide beyond the simplistic ratio targets of development that have not served our state well as they have led to the current Housing Affordability Crisis.

4. Skills Shortage

The UDIA is aware of a skills shortage in South Australia, with the surveying course only recently being reintroduced to Flinders University, no undergraduate planning degree in South Australia and a known shortage of skilled workers across the industry including builders, engineers, planners, and lawyers. Without an appropriately skilled workforce the growth aspirations in the GARP will not be deliverable.

The UDIA calls for additional funding by the State Government being made towards the retention of key industry staff and retention of our young people, making South Australia a more attractive place to live and work, and the establishment and promotion of tertiary courses to deliver the skills needed.

Employment

The UDIA supports the creation of thriving communities, with employment opportunities being a key focus of this. With the creation of jobs and the notion of 'living locally' comes the creation and retention of employment land. We would like to see the appropriate retention and creation of employment land throughout Greater Adelaide and the Adelaide CBD. This means an appropriate mix of zoned land throughout, with care taken to protect strategically valuable employment land from rezoning.

We are also interested in greater clarity regarding the smarter and cleaner economy and related jobs for the state mentioned in the Discussion Paper. With the biggest sectors for future employment outside of the construction industry including:

- Defence;
- Education;
- Primary production;
- Clean energy;
- Space;
- Resources; and
- Health (medical and biotechnology).

We hope that the vision for the economy considers the employment needs of future residents of Greater Adelaide.

Conclusion

Proper planning for growth gives the State the greatest opportunity to deliver a built form that meets the needs of South Australians over the coming thirty years. There is an urgency to deliver this growth that has not previously been common to South Australia with plans and targets that, if met, will set up the State to thrive. The future of our State needs the Government to rise above the old NIMBY arguments that until now have far too often derailed projects that have strategic planning merit. The scale of the challenge calls for the highest levels of conviction and leadership.

That is why the UDIA is focused on highlighting the need for additional land supply (in the short and long term) supported by infrastructure (hard and soft) to support growth and create thriving communities. While it may be easier to project growth and land consumption rates that avoid difficult debates about the nature and location of future developments, the Discussion Paper provides the right platform to have this important discussion with all South Australians. We look forward to an outcome that matches the State's ambition for the future of the South Australia.

APPENDICIES

Appendix A – grow.reform.build - UDIA 2022 State Election Priorities

Appendix B – UDIA Submission - Planning System Implementation Review 2022

Appendix C – UDIA Submission – Environment and Food Production Areas Review 2021

Urban Development Institute of Australia
SOUTH AUSTRALIA

grow.reform.build.

URBAN DEVELOPMENT INSTITUTE OF AUSTRALIA (SA)

2022 State Election Priorities

For more information about the Urban Development Institute of Australia (SA) 2022 State Election Priorities, please contact:

Pat Gerace, Chief Executive
udiasa@udiasa.com.au

Find more information about the UDIA (SA) and our advocacy work on our website udiasa.com.au

grow.reform.build.

URBAN DEVELOPMENT INSTITUTE OF AUSTRALIA (SA)

2022 State Election Priorities

Urban Development Institute of Australia
SOUTH AUSTRALIA

Reade's Plan for Mortlock Park 1917.

South Australia's rich history of planning extends far beyond just the City of Adelaide.

In 1916, Charles Reade was employed as South Australia's (and Australia's) first Government Town Planner.

Shortly following his appointment in 1917, he designed a new suburb with the working title 'Mitcham Garden Suburb'. His plans were shown publicly and for the first time at the first Town Planning and Housing Conference and Exhibition in Adelaide in October 1917.

We now know this suburb as Colonel Light Gardens.

URBAN DEVELOPMENT INSTITUTE OF AUSTRALIA (SA)

2022 State Election Priorities

grow

Address the housing crisis.

Modern planning for growth and liveability.

reform

Transparency and accountability for home buyer levies and taxes.

Invest funds collected for open space on open space.

build

Better and more community infrastructure.

Stop taxing production of housing.

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Message from the President

For 50 years, members of the Urban Development Institute of Australia (SA) have passionately contributed to the success of our great state.

They have created employment for tens of thousands of South Australians and built places that we call home.

As passionate as our members are, increasingly as they risk their livelihoods, more and more regulatory and financial obstacles continue to be put in place that prevent them from delivering more of the great Australian dream.

UDIA members know that we must protect our liveable city — but that there is a better way.

We need better planning and growth strategies for our city, our existing taxes and contributions need to be better spent, and we urgently need more clear and transparent policy making based on better data. Above all we need a more collaborative approach.

A new or returned State Government must work alongside us so we can help create the conditions that support development. One where we return the pendulum back to place so more of us can invest with confidence and create the new communities we so desperately need.

When our members are active, the economic heartbeat of the state is stronger.

Our blueprint for prosperity, **Grow, Reform, Build** has been developed to serve as a guide to turbo charge the positive change that will enable our state to maintain liveability for the benefit of all South Australians — now and into the future.

On behalf of the UDIA, we look forward to working side by side with the future State Government for the benefit of all South Australians.

Daniel Palumbo
President

Message from the Chief Executive

In the lead up to the 2022 South Australian State Election, the UDIA SA is calling on all political parties and candidates to focus on maximising South Australia's opportunities as an attractive place to live, work and invest, to enable our communities to prosper.

To strengthen and diversify our economy, the incoming government must fully leverage what our state can offer the people who live here and those who are considering business here, travelling here or relocating here in the coming years.

To maximise South Australia's opportunities as the ideal place to live, work and invest, UDIA SA has developed key recommendations built around three key pillars — **Grow, Reform and Build.**

Our recommendations are designed to ensure that South Australia's urban development industry can continue to prosper and play a key role in the continued success and growth of our state for the benefit of all South Australians.

Not only is the urban development industry a significant employer, representing the second highest number of fulltime workers (77,200 employed) in South Australia and $7.8 billion in gross value added to the economy, but our industry facilitates and supports the delivery of high-quality urban infrastructure critical to providing all South Australians with the opportunity to succeed.

We want to work together with the incoming government to harness our state's unique and positive characteristics and build on our reputation not only as Australia's most liveable city and the world's third, but as the best place to live, work and invest.

Pat Gerace
Chief Executive

About the Urban Development Institute of Australia (SA)

The Urban Development Institute of Australia (SA) was established in 1971 and is the leading representative body for the urban development industry.

With representation nationwide, we work for the benefit of the South Australian industry and alongside other State and Territory divisions to advocate for meaningful policy reform locally and nationally.

The UDIA in South Australia is a not-for-profit membership organisation. Our members that we represent includes all organisations and people involved in the development of homes, infrastructure and suburbs — the foundation of our current and future communities.

We exist to support the urban development industry — South Australia's third largest employing sector with the second highest number of fulltime workers, boasting more than 77,000 full time employees across the state.[1]

Our purpose is to represent the views, wants and needs of those within our sector — and equally those of their customers who are everyday South Australian homeowners, aspiring home buyers, renters and our most vulnerable residents, including those eligible for social and affordable housing.

We work to promote excellence and innovation in the creation of sustainable and thriving communities, as well as educate and engage with the government and urban development sector on all issues affecting new residential property, particularly pertaining to affordability and liveability.

Our valued members benefit from exclusive access to a range of purposeful policy updates and relevant advocacy information that are pertinent to the development industry, professional learning and development opportunities, and insightful events that connect, engage and build networks.

Ultimately, everything we do is to ensure a thriving urban development sector in South Australia — for businesses, for people, for communities and for our future.

1. https://www.abs.gov.au/statistics/labour/employment-and-unemployment/labour-force-australia-detailed/latest-release

Introduction

A solid foundation for success

As South Australians we are parochial about our great state. Among the many things we treasure about our place is that it is a great place to work, live and play.

Successive South Australians have called the suburbs of Adelaide home; a place where they have raised families and enjoyed a quality of life that is the envy of others both interstate and abroad.

Much of this is possible thanks to generations of South Australians who have invested in growing our state and economy, planning and building infrastructure so that every future generation has the best foundations to create their own success.

It's not surprising that many political leaders like to highlight Adelaide's high liveability rankings or quote median house prices in South Australia to demonstrate the great work they are doing.[2]

Unfortunately, while spin and social media are used to promote South Australia, our leaders rarely talk in detail about what they are doing to protect everything we hold so dear about our state. Liveability is a term they frequently reference, yet most are reluctant to specifically define it.

We know that as much as work, live and play are important, it's also the balance between these that makes a place emphatically liveable. Finding this balance is why the UDIA has developed Grow Reform Build — South Australia's 2022 State Election blueprint for prosperity.

Commitment from the urban development sector

The UDIA represents the property development sector and all within it — the South Australians who are proud to build new suburbs, the buildings that people call home, and all the surrounding infrastructure that lay the foundations for these places to become thriving communities.

Our members sell to, build for and employ South Australians, knowing as well as anyone what they value most. South Australians want suburbs with open space, trees and high-quality public realm. They value ready access to services such as transport, education and health facilities.

With the combined strength of our members, we know what is needed to protect our state's liveability.

Our plan to grow, reform and build

As a membership body we are uniquely placed to see and experience first-hand what South Australian's value most about the places they live.

We also see and experience each of the different and competing interests of policy makers, agencies and levels of government, and how they are often at odds with each other.

From a state-wide perspective, we see that without necessary and thorough planning, development can adversely change the character of our existing suburbs and streets.

We see the impacts of a lack of investment in public transport, roads and trunk infrastructure and how this neglect can easily lead to the same congestion and 'growing pains' being witnessed interstate.

That is why we are calling for vastly improved and more detailed planning, based on better data and an understanding of what people need and value, rather than telling them what they want.

UDIA believes that a key focus for our state now and into the future should be that South Australia continues to be undoubtedly the place where you can still achieve the great Australian dream.

Home ownership means different things to different people — for some it is in a compact denser neighbourhood or apartment, for others it is a place where you can have a trampoline, trailer and a dog.

For those that can't afford to invest in purchasing a home, the certainty that comes with knowing a place to rent is affordable and available, in an area that they are attached to or familiar with, can make a significant difference.

We know that a place to call home offers undeniable sense of safety, security and stability — a fundamental human need as defined in Maslow's Hierarchy of Needs, and is a proven pathway to intergenerational prosperity.[3]

This is why we are calling for a renewed and dedicated focus on home ownership.

Unfortunately, there are a broad range of government policies that do not consider the impact on housing affordability, either directly or indirectly. The hidden cost of land and new housing through state and local government levies and charges — and many of those don't get reinvested when and where they are collected — must be addressed.

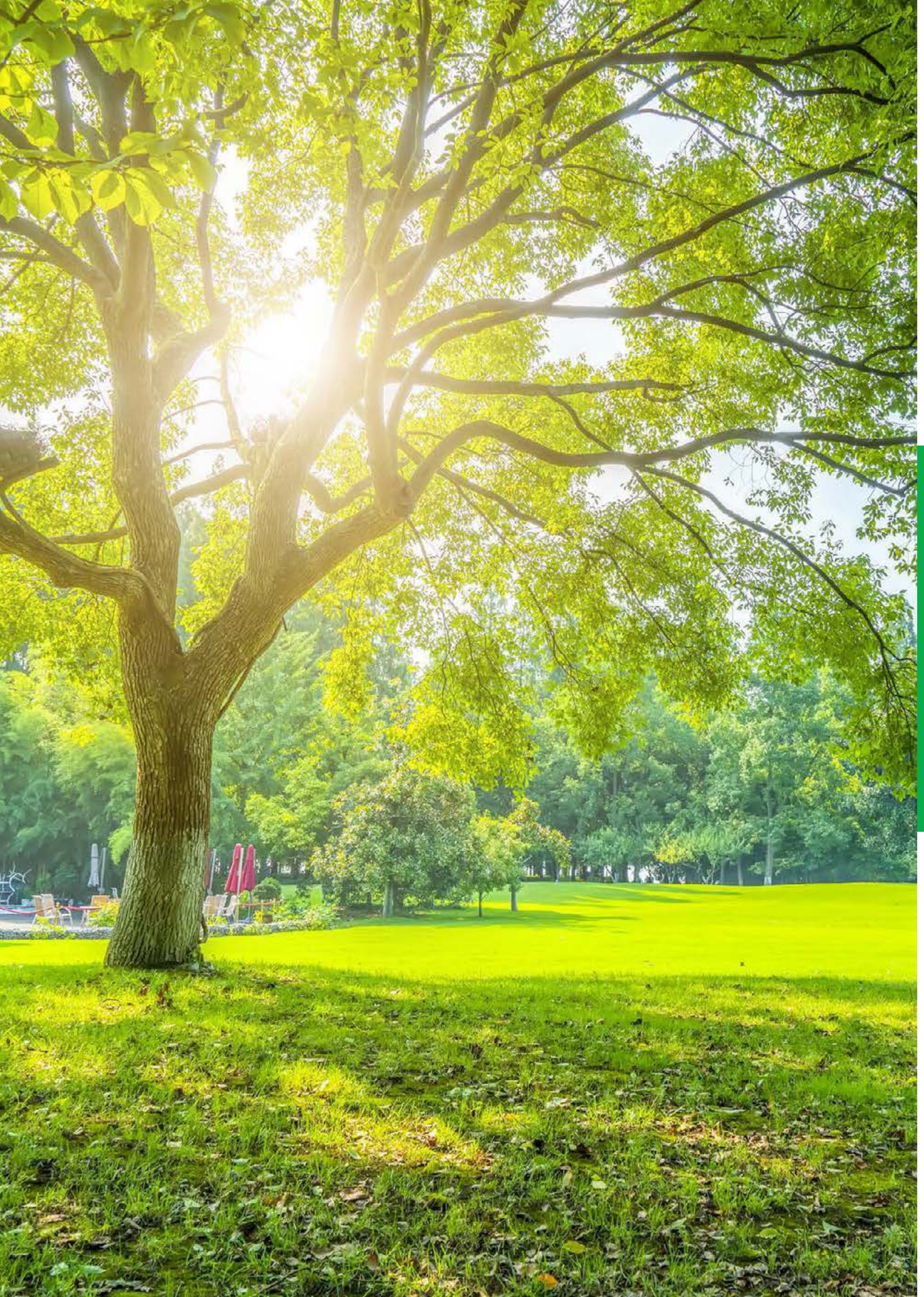
Another key focus is to rectify the failures of our planning system that currently does not operate with any genuine connection to what the majority of South Australians value most.

The three pillars outlined in this document, Grow, Reform and Build, are targeted recommendations to get South Australia back on track.

Some are immediate steps to make a material difference, and others represent the beginning of a transformative journey that will lead to new and better approaches to urban development, more suited to South Australia's modern environment.

2. Economist - https://melbourne.org.au/wp-content/uploads/2021/06/global-liveability-index-2021-free-report.pdf

3. https://www.aihw.gov.au/getmedia/602000e9-adef-4939-a767-61945a7f6c06/haia-c01.pdf.aspx



grow

Address the housing crisis

South Australians have always been proud that, for a vast majority and those lucky enough to be employed, if they wanted to own their own home, it was possible.

However, the alarm bells are ringing and many are already describing the current housing situation in South Australia as a crisis — the great Australian dream of owning a home is quickly becoming out of reach for some.

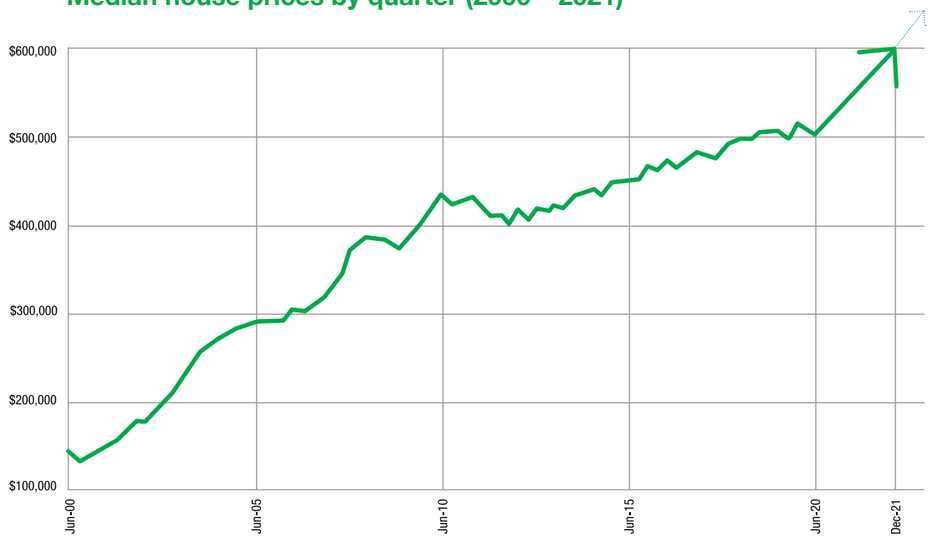
For South Australia, subdued population growth and relatively flat labour markets compared to other states have helped contain house prices in the past, but post-pandemic and with renewed interest in South Australia, we can no longer rely on those circumstances to protect things we hold dear.[4]

What and whether you can buy a house is a function of how much you earn and unfortunately on this metric, our housing market is the third least affordable nationally — falling behind Brisbane and Perth, even with a less buoyant economy and weaker immigration figures.[5]

The two largest contributors to this problem from a state perspective is the failure to plan for growth and the hidden cost of land and housing.

Graph 1: Adelaide Metropolitan Area

Median house prices by quarter (2000 – 2021)



Source *sa.gov.au*

Source
sa.gov.au

54%
increase of median house prices in Adelaide since 2011

$600k
median Adelaide house price

The benefits of home ownership

+ Because the value of their homes are directly affected by what happens in the surrounding community, owner occupiers are likely to have stronger incentives than renters for civic involvement.

+ Home ownership provides greater security of tenure, reinforcing incentives for community participation. Less frequent relocation also minimises disruption to established social networks and children's education.

+ By giving occupiers more control over their living space, home ownership can enhance self-esteem, in turn reducing the incidence of socially disruptive behaviour and promoting physical and emotional wellbeing.

Source

Australian Government Productivity Commission Inquiry Report — First Home Ownership, March 2004

4. https://www.sa.gov.au/__data/assets/image/0008/169748/3rd-quarter-2021-metro-median.png
5.Demographia

Challenge

Current system is not conducive to housing affordability

The residential development industry builds homes for South Australians, delivers critical economic activity across the state and is reliant on two key factors:

1. Development must be commercially viable and is largely driven by the cost of land, construction and the value of the end product; and
2. Residential products (homes) delivered to market must be relatively affordable for homebuyers at different income levels.

The major reason for diminishing affordability is the hidden cost of land and housing imposed by taxation, regulatory charges and development delays which reduce feasibility and increase the purchase price.

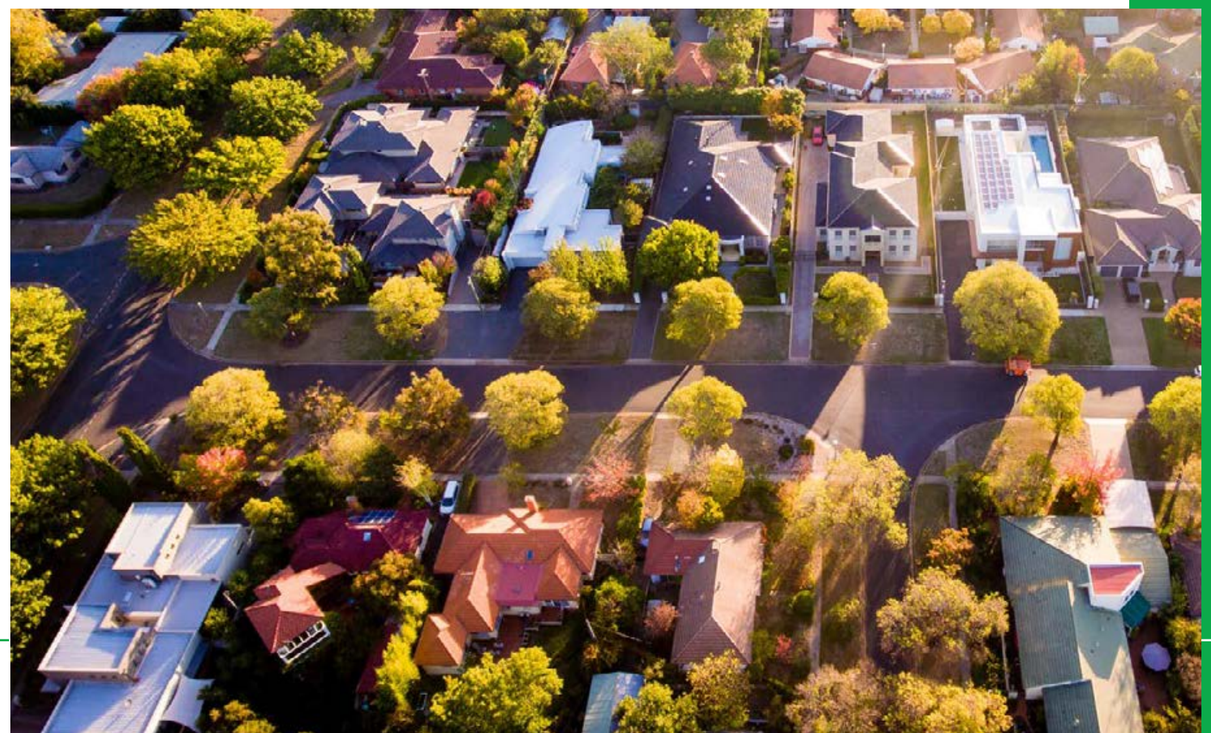
Addressing housing affordability should involve a series of measures that make housing accessible to all South Australians — not just mandating contributions and restrictions through the planning system.

Successive governments have hidden behind announcements about building and maintaining public housing stock which might provide some affordable housing — this is not the same as housing affordability.

While there is an important and critical role to assist those most in need within our community, the majority of South Australians will not qualify or want to access public housing, but that doesn't negate the responsibility or need for measures to address the affordability of housing for them.

Taxes and charges all contribute to retail pricing. Though often hidden, these costs are paid nonetheless and must be funded by the homebuyer or paid back over time through their mortgage.

With land and construction costs already under pressure, it is the hidden costs of housing that we ask a future state government to immediately address.



Housing affordability — how we stack up

On an international scale, Adelaide is right up there with our eastern seaboard counterparts as unaffordable.

Affordable

Most affordable
Pittsburgh, U.S.

2 Rochester, U.S.

3 Buffalo, U.S.

Unaffordable

23 Perth, Australia

18 Brisbane, Australia

13 **Adelaide, Australia**

6 Melbourne, Australia

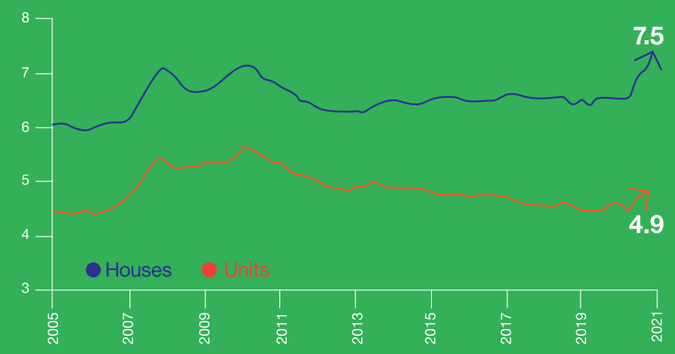
3 Sydney, Australia

2 Vancouver, Canada

Most unaffordable
Hong Kong, China

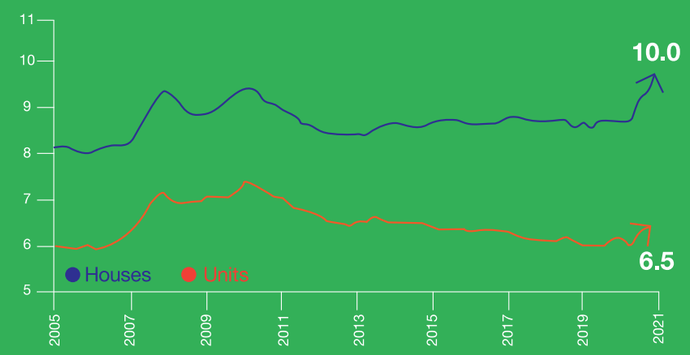
Source *2021 Demographia International Housing Affordability*

Graph 2:
Value to household income ratio



In South Australia, housing values are growing disproportionately to household incomes so saving a deposit has never been more challenging.

Graph 3:
Years to save a deposit



Source *Core Logic*

Springwood, Gawler East

Taxes and charges collected by the government

- Developer Land Tax
- Stamp Duty (twice being paid, once by the developer and once by the homebuyer)
- Foreign buyer surcharge
- GST
- Infrastructure Contributions
- Open Space Contribution/Levy
- Developer Council Rates
- Utility charges
- Code amendment fees
- Development approval fees

$215m Homebuilder stimulus drove additional $215m Stamp Duty above forecast in just one year!

Stamp Duty – the most inefficient and punitive tax of all

It is the single biggest transactional cost for purchasers of residential property. It acts as a disincentive to the turnover of housing stock and encourages homeowners to hold onto existing properties rather than find new accommodation more suited to their needs, as well as reducing redevelopment opportunities

With review after review, the one thing everyone agrees upon is that it is inefficient, punitive and serves only one purpose — to collect revenue. With government budgets constrained due to the pandemic and short-term relief measures unaffordable, there is no better time to start a discussion about a pathway for wholesale reform in the future.

South Australia has already removed commercial stamp duty entirely and the Commonwealth and other states have commenced conversations and reforming residential stamp duty. An incoming government must make a commitment to reform so we are not left behind.[6]

>$22k collected on the median house price

$1.736 billion land tax and stamp duty revenue for South Australian Government forecast for 2021/22

Source
2021–22 State Budget, page 37

6. *https://www.nhfic.gov.au/research/researchreport/stamp-duty-reform/stamp-duty-reform-benefits-and-challenges/*

Challenge

The hidden costs of housing and development

There has never been a more critical time to get real about the high cost of housing of land in South Australia.

With the right measures and processes, this will be critical to realising the Australian dream — keeping South Australians owning and renting their own homes, and off the government's social and affordable housing waiting lists.

Recommendations

G1 Create and fund a cross-government task force led by the State Planning Commission with representation from the building and development sector to develop a new housing affordability and ownership action plan.

G2 Allocate responsibility and accountability for housing affordability and liveability across all government ministerial portfolios.

G3 Incorporate a Housing Affordability and Sustainability Impact Statement into all relevant Cabinet submissions to ensure cost impacts of new policies on consumers are minimised.

G4 Implement a continuing requirement for a State Government review of the cost impact of all policy decisions on construction and development standards.

G5 Create focus on housing affordability and ownership by considering appropriate amendments to the Planning Development and Infrastructure Act 2016 and associated regulations.

G6 Commit to an investigation of economic reform for the provision of housing in South Australia including:

a. The development of a regulatory impact statement on all fees, charges and regulations related to the provision of housing

b. A transitionary pathway to reducing reliance on inefficient taxes and charges

c. Options for the deferral of up-front taxes and charges for consumers to improve affordability

d. Immediately abolishing stamp duty on all new residential, owner occupier, off the plan housing construction below the median house price to improve affordability and increase housing supply.

G7 Commit to a moratorium on new value capture taxes and charges.

G8 Commit to a moratorium on new or changed inclusionary zoning policies without engagement and agreement of the development sector.

Modern planning for growth and liveability

If you are from South Australia, you know who Colonel William Light is and the impact his vision continues to have on our state centuries later.

Fast forward to 2021 and unfortunately despite much talk about the planning system and lengthy debates in parliament when the new Act was passed in 2016, it is hard to say that the system is working as well as it should be.

Delivering an electronic planning system for processing applications isn't a substitute for actual considered planning for growth and has arguably moved the focus away from the planning 'outcome' to the planning 'process'.

There are two main areas that need to be addressed.

1. Regional planning policies that address the look and feel of our city, suburbs and regions encompassed in a 30-year plan for Adelaide.
2. Planning policies underpinned by evidence, metrics and contemporary data to ensure adequate supply of suitably zoned land for positive and sustainable growth in residential, commercial, and industrial areas.

Challenge

An outdated 30-year plan

Regardless of whether Adelaide's population growth is modest or strong, there is an undeniable need for a plan that ensures that the things that matter, the things that create a liveable, sustainable and thriving community, are provided for.

A plan that addresses various scenarios and adapts accordingly to shape Adelaide in the most appropriate way is a necessity — a plan that takes into account trends in living patterns and addressing affordability to maintain Adelaide's liveability.

The current version of the 30-Year Plan for Greater Adelaide simply became a list of aspirations of every government agency and a way to avoid detailed investment plans and commitments by state and local government.

One of the most obvious symptoms of not carefully planning for growth, is that more people who fear for what they may lose will begin to resent progress, and subsequently rally for no change at all. It's therefore critical that we get the planning right.

Future state and local governments must stop abdicating their responsibility for public transport, road infrastructure and key essentials for new and thriving communities, and start investing in growth and urban regeneration areas.

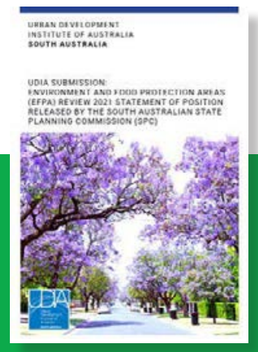
In new growth areas, incorrect assumptions and populous statements are too often used as a reason for restricting development because of the government's reluctance to invest in infrastructure.

In the 2020 Infrastructure Strategy released by Infrastructure SA[7], generalised statements about the role of growth areas were made based on the technical work of Infrastructure Victoria[8]. Unfortunately, generalised assumptions like this are at the expense of the primary driver in maintaining housing affordability, namely competitive market tension as well as providing more sustainable communities.

Other sustainability targets such as increased tree canopy for suburbs will also fail without better policies. Consumers want bigger houses and more amenities, but land prices are high and governments don't want to service growth areas, so naturally lot sizes and yards end up being smaller.

Until governments get serious about committing to and supporting a foundation for more green and spacious suburbs, simply telling developers, planners and consumers to just 'be green' is a plan destined to fail.

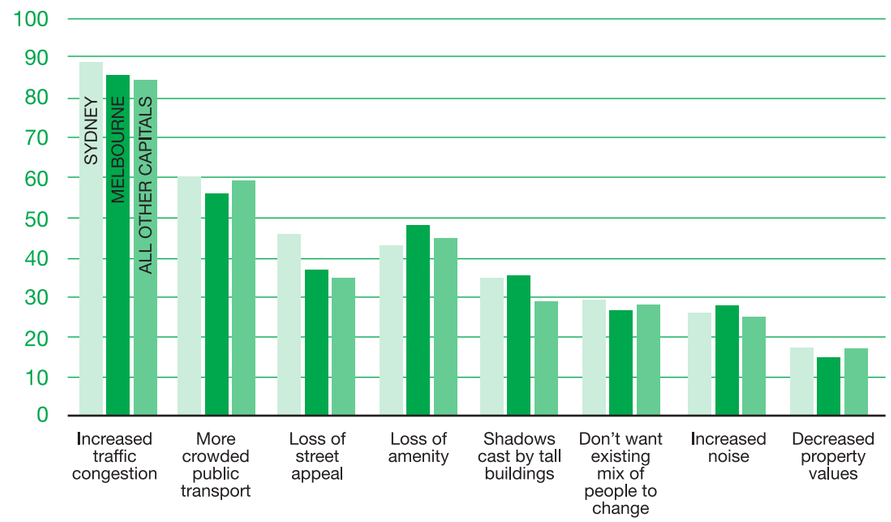
To develop a new 30-year plan that works, we must better understand what people want and create an environment that supports developers to build more of the outstanding new communities and a diversity of product — the ones that people want.



Read the UDIA SA Environment and Food Protection Areas Review Submission on the UDIA SA website

Graph 4:

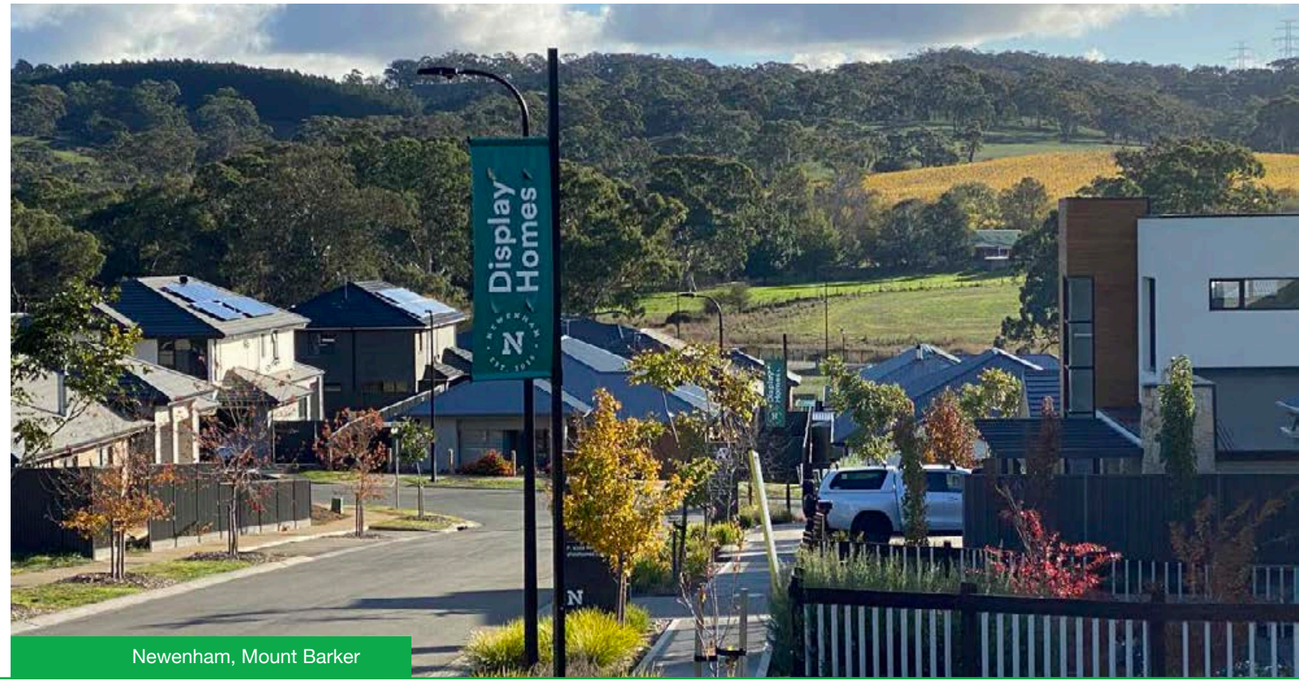
Reasons why people don't want population growth in their neighbourhood[9]



Source

Grattan Institute

grattan.edu.au



Newenham, Mount Barker

7. Infrastructure SA Strategy https://www.infrastructure.sa.gov.au/__data/assets/pdf_file/0006/197511/20-Year-State-Infrastructure-Strategy-Full.pdf
8. Infrastructure Provision in Different Development Settings

9. https://grattan.edu.au/wp-content/uploads/2018/03/901-Housing-affordability.pdf

Challenge

Failure of the Planning Development and Infrastructure Act 2016

Despite the Planning Development and Infrastructure (PDI) Act 2016 being 278 pages in length and with just as many regulations accompanying it, the word affordability appears only three times and the phrase 'housing affordability' does not appear at all.

In this context it is not surprising that in operation, the Act is failing to deliver in some key areas.

One key feature of the PDI Act is the process to review the available land supply and changes that need to be made to Adelaide's footprint.

Under the PDI Act, the State Planning Commission is required to conduct an independent review every five years to assess future housing requirements.

Since its introduction however, the State Planning Commission has had no dedicated resources, staff or independent research capability, and for what is arguably one of the most important roles of the State.

In June 2021, the State Planning Commission completed its first review and under this infrequent and slow responding model, a declaration was made that there is adequate supply for future housing needs.

The land supply analysis informing the Environment and Food Production Areas Review relied upon population forecasts that pre-date the known impacts of the COVID-19 pandemic and its implications on overall population growth.

It also failed to consider detailed modelling around the impacts of the new Planning and Design Code. In addition, land use patterns across different parts of Adelaide were not considered and instead a 'Greater Adelaide' assessment of demand and supply was used.

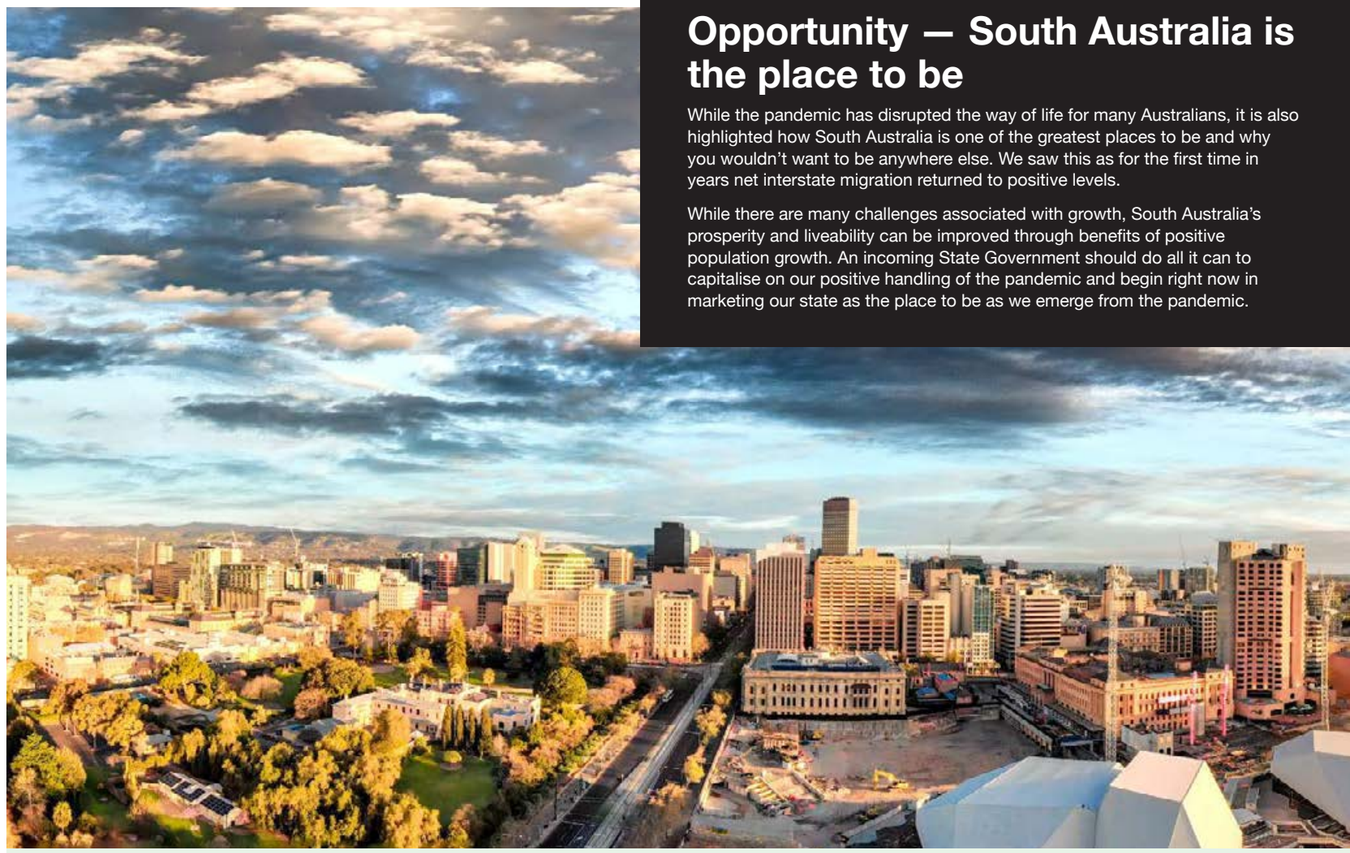
As a consequence, Adelaide now relies on assessment of its long-term strategic planning and housing needs, based on outdated assumptions, leaving South Australia facing a great hurdle in quickly responding to affordability challenges in the future — challenges already being experienced in specific parts of Adelaide.

Not only does the UDIA believe the State Government has missed the mark on this, but the conclusion is also at odds with the Federal Government's report prepared by the Federal Government's National Housing Finance and Investment Corporation, which states:

Adelaide is soon to enter a period of under-supply against demand and forecasts 'supply is likely to remain soft and below demand from 2022'.

This reinforces the need for quick responses by governments and councils.

The UDIA made a comprehensive submission to the State Government and we continue to call on them to immediately act on these recommendations.



Opportunity — South Australia is the place to be

While the pandemic has disrupted the way of life for many Australians, it is also highlighted how South Australia is one of the greatest places to be and why you wouldn't want to be anywhere else. We saw this as for the first time in years net interstate migration returned to positive levels.

While there are many challenges associated with growth, South Australia's prosperity and liveability can be improved through benefits of positive population growth. An incoming State Government should do all it can to capitalise on our positive handling of the pandemic and begin right now in marketing our state as the place to be as we emerge from the pandemic.

Recommendations

Unashamedly plan for growth to protect our liveability and make South Australia a lifestyle destination of choice by:

G9 Invest in the development of a new real time electronic urban development monitoring tool in partnership with the UDIA, to improve state-wide planning for growth, liveability and affordability, and encourage increased private sector investment.

G10 Develop a new 30-Year Plan for Greater Adelaide[10] by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity (see recommendation B1).

G11 Implement recommendations provided to the State Government and State Planning Commission in response to the recent Environment and Food Production Area review and in particular:

a. Ensure Regional Plans for Greater Adelaide is premised on multiple scenarios and builds in appropriate growth opportunities in locations which are sought by the market.

b. Address the over reliance in housing supply of single dwelling subdivisions and instead proactively and urgently increase land supply in market responsive locations including greenfield and large-scale brownfield areas.

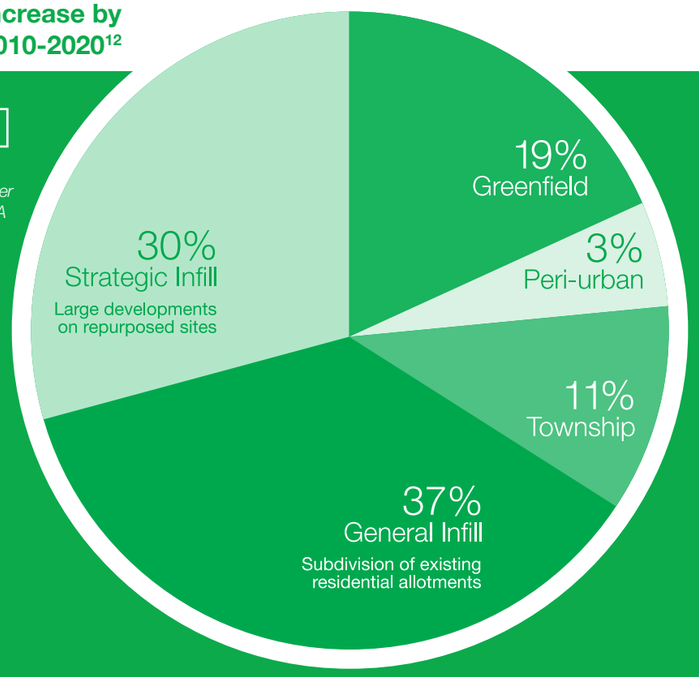
G12 Independently review the operation and effectiveness of the new PlanSA e-Planning system and its impact on affordability through consultation with the development sector, councils, and utilities.

10. Referred to regional plans under the PDI Act.

Net dwelling increase by development type 2010-2020[12]

Source

Land Supply Report for Greater Adelaide, PlanSA



Part of the problem — 30-Year Plan for Greater Adelaide

The 30-Year Plan for Greater Adelaide was a useful document when first released, but 15 years on and it's time to take stock on what has worked and develop a new vision for Adelaide.

As an example, in the 2010 30-Year Plan for Adelaide it states:

By focusing growth in transit corridors we can ensure that we preserve Adelaide's distinctive urban character, leaving about 80 per cent of metropolitan Adelaide largely unchanged as a result of the Plan.

Just over a decade on, in a report released less than six months ago by PlanSA, it has been shown that development patterns have not eventuated in this way with general infill (single dwelling knock down and subdivision) representing 30%[11].

This has presented issues such as car parking, loss of tree canopy and many other issues which the State Planning Commission has had to address[13]. Some issues these create for liveability have also been articulated by the Southgate Institute at Flinders University which found that:

Neighbourhood transition is already occurring across southern Adelaide by multiple actors; however, often in ways that don't contribute to improving neighbourhood liveability. Infrastructure, streets, footpaths, open spaces, public spaces and places are maintained and constantly altered by multiple actors subject to standards that often do not conform to the optimums required to enhance neighbourhood liveability. Private built form is constantly being redeveloped via small scale ad hoc infill.[14]

Without a new plan this will go unaddressed. As can be shown in the extracts below, future land supply in the departmental reports released as recently as 2021 are for 30% of new housing supply over the next ten years form this type of development[15]. This means the demolition and subdivision of 68,000 dwellings of existing houses in existing suburbs.

With a new plan instead, we could begin a conversation about more large-scale strategic infill projects and work to unlock medium to higher density projects in appropriate areas. Better planned and more sustainable developments can include open space and, provide for suitable infrastructure upgrades. Similarly, there could be a more strategic commitment to revitalising the city centre with more residents.

The coloured areas in each of the diagrams represent demolition and rebuild areas identified by the government

Diagram 1:

Inner North

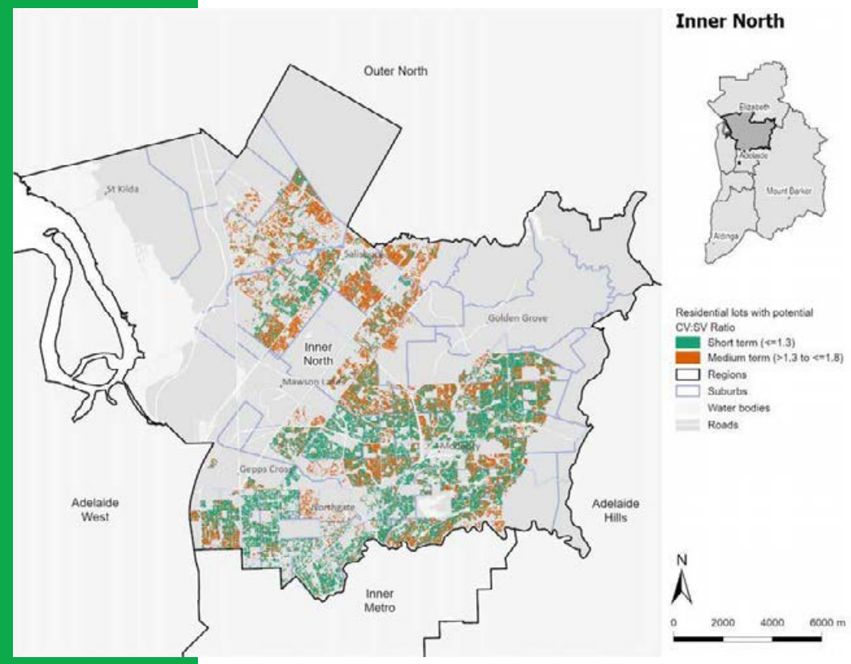
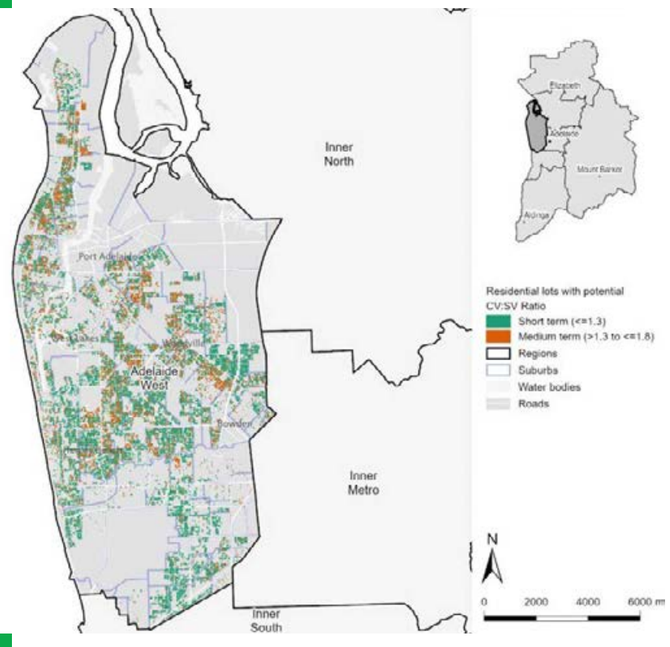


Diagram 2:

Adelaide West



Source

Land Supply Report for Greater Adelaide, PlanSA

11. Define general infill
12. Land Supply Report For Greater Adelaide, Background and Context
13. State Planning Commission Infill Guidelines
14 https://www.flinders.edu.au/content/dam/documents/research/southgate-institute/Healthy-South-HUNTT-project-brief.pdf
15 https://plan.sa.gov.au/state_snapshot/land_supply

The coloured areas in each of the diagrams represent demolition and rebuild areas identified by the government

Diagram 3:
Inner South

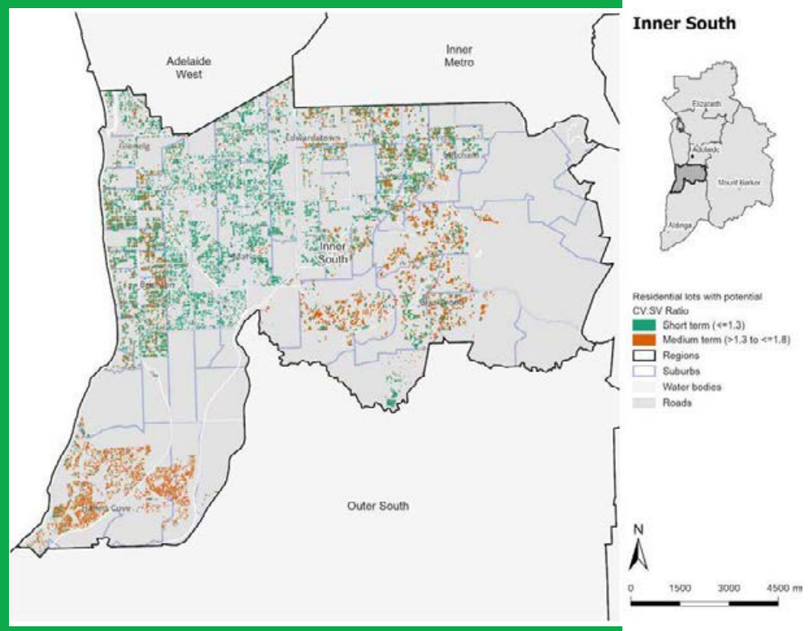
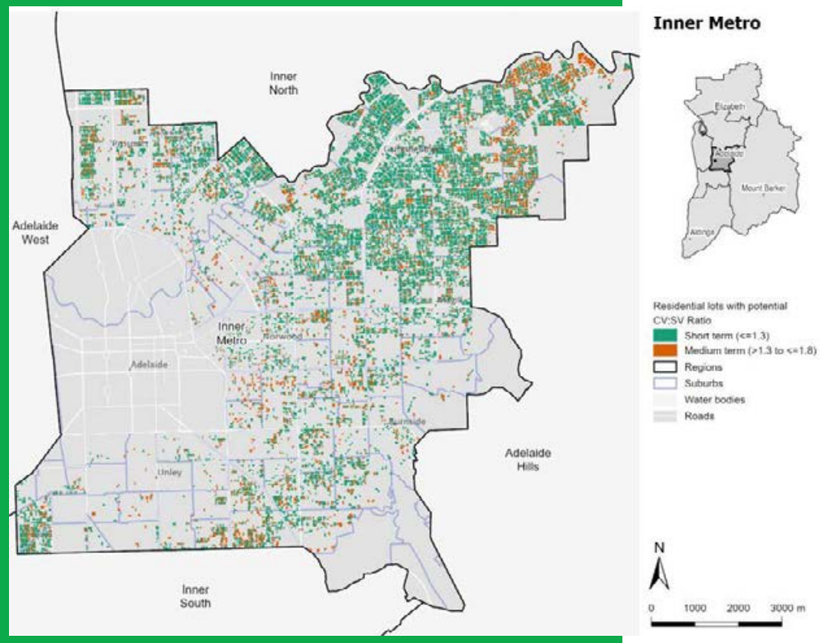


Diagram 4:
Inner Metro



Source

Land Supply Report for Greater Adelaide, PlanSA

reform

Transparency and accountability for home buyer levies and taxes

While essential levies and taxes add additional costs to housing, infrastructure is key when determining the liveability and affordability of living in South Australia.

Unfortunately, the regulatory and governance systems that identify, estimate, negotiate and charge for the delivery of key infrastructure, is of a poor standard. This finding was confirmed in the National Housing Finance and Investment Corporation report, *Developer contributions — How should we pay for new local infrastructure?*[16]

Challenge

Infrastructure and regulatory requirements for developer approvals

State government agencies, regulators, local government and utilities often have little or no incentive to consider the impacts of housing affordability.

When developers enter into negotiations with these bodies, the temptation to offset future budget requirements or cover investment and maintenance back logs against new developments, can often be too strong to resist.

In some cases, the regulatory systems and bodies even exclude housing affordability as a consideration, or requirements can be so stringent that they exceed 'fit for purpose' due to a total risk elimination approach.

The flow on impact of our poor systems is that those who can least afford it end up bearing the brunt — and almost always for many years over the life of a mortgage.

Historical underinvestment by state and local governments is funded by the next generation of homeowners who are already facing tougher home ownership conditions than their parents ever did.

The State Government must demonstrate leadership to reform the system and ensure greater transparency, efficiency and accountability to make better use of what is already collected.

Challenge

Developer contributions and delivery of infrastructure

Read the National Housing Finance and Investment Corporation report on the UDIA SA website. The report states:

Although developer contributions may (in theory) help ensure developers factor in and contribute to the cost of new infrastructure around housing developments, these contributions are typically complex to estimate and costly to administer. If developer contributions are unpredictable, poorly scoped or administered inefficiently, they have the potential to impede new housing supply and unnecessarily increase the cost of new housing.

Unfortunately, once developer contributions are made the mechanisms for reporting and oversight for these contributions is substandard.

State Government agencies and local government are responsible for the delivery of infrastructure, however information and reporting on what has been collected, expended and future plans for infrastructure investment is often very limited.

Sometimes this means that home buyers have already paid for amenity in a development but are faced with long waits and developers are powerless to intervene.

Developer contributions that are funded by homeowners shouldn't be subject to any less transparency than any other government functions and the system needs reform.

By better targeting what we need, promoting competition and efficiency, more new homeowners will be able to enjoy a better and more liveable community.

Recommendations

The UDIA is calling on the incoming state government to commit to the review, identification and improvement of regulatory oversight involving developer contributions and charges.

R1. Enforceable guidelines are implemented so that:

a. Developer contributions are fit for purpose and relate to the development project in question

b. Genuine competition and best pricing principles address monopolistic behaviour.

R2. State and local government agency requirements (including utilities) can be reviewed and contested to ensure that they are not cross subsidising other activities unrelated to the development.

R3. Contributions already collected by state and local government must be reported and audited annually with detailed plans and timeframes for their use.

16. https://www.nhfic.gov.au/research/researchreport/developer-contributions-how-should-we-pay-for-new-local-infrastructure/developer-contributions-how-should-we-pay-for-new-local-infrastructure/

Northridge, Enfield

Invest in open space

A key determinant of liveability in a city is the amount of open space, including its quality and function, as well as the streetscapes and public realm. The best suburbs in Adelaide all boast a powerful combination of these.

Open space requirements are governed by the PDI Act and unfortunately the framework adopted to ensure Adelaide has the best open spaces is simply not delivering on its intention.

The UDIA suggests a comprehensive legislative review is required and that the State Planning Commission consult with the sector and councils on what best suits Adelaide, with a consideration to world's best practice.

How the system works now

The Planning and Development Fund (the Fund) operates under the Planning, Development and Infrastructure Act 2016 (the Act) and provides the means for open space and public realm investment across South Australia.

Monies paid into the Fund are derived from monetary payments in lieu of open space requirements for development involving the division of land into 20 or fewer allotments and also for strata and community titles. The Fund is expended in line with provisions within the Act and is administered by the Office for Design and Architecture SA within the Attorney-General's Department.

Where an application for a development authorisation provides for the division of land into more than 20 allotments, the council in whose area the land is situated may require that up to 12.5% in area of the relevant land area be vested in the council as open space or provide a financial contribution in lieu of the provision open space.

The developer not only provides land for open space but also funds, develops and delivers parks, recreation and infrastructure on this land that is subsequently divested to Council (for example playgrounds, paths and landscaping).

Challenge

Urban infill contributions going to the wrong place for the wrong thing

Each time a property in Greater Adelaide is subdivided, developers are subject to a fee of more than $7,900 per new allotment. This fee, which is passed on to homebuyers, is contributed to the State Government's Planning and Development Fund — funds flagged for investment in open space and public realm. However, where these dollars actually get spent would shock many South Australians.

The current process is outdated and where the funds are spent has no regard for where they derived from.

More often than not, funds are allocated to councils and projects that have the greatest capacity to deliver, rather than the greatest need for investment in amenity and infrastructure, an outcome that is largely the result of the matched funding criteria.

In fact, a large portion of the funds collected from suburban Adelaide are used to fund the State Government's regional projects.

Further, the formula and strategy for what is collected bears no resemblance to what already exists on the ground or is available to residents.

Every dollar contributed by homebuyers to open space should be spent on open space and more of it in the local area from which it was collected; on innovative projects that meet needs and deliver value for communities.

The incoming state government must stop using a dedicated open space fund to address other infrastructure investment or needs, including the redirection to fund the creation and implementation of the new 'Planning and Design Code' — despite the fact the state government collects millions of dollars in fees that should have been used to fund this project.

Challenge

Lack of strategic planning for coordination of open space

Councils should be planning strategically for open space in their area with clear objectives and coordination.

Currently, due to the short-term budget considerations of some councils, developers are requested or forced to make cash payments in lieu of open space.

Further, though inconsistent with the Green Adelaide Regional Landscape Plan and in conflict with creating more sustainable urban environments, instances of developers being instructed by councils to install concrete or hard surfaces rather than sustainable green landscaping so the council can avoid ongoing maintenance costs and obligations when the open space is divested to them, are becoming all too common.

The incoming state government must play a role in ensuring councils develop strategic plans, address the varying standards of open space across council areas, and ensure there is a coordinated approach across the greater metropolitan area.

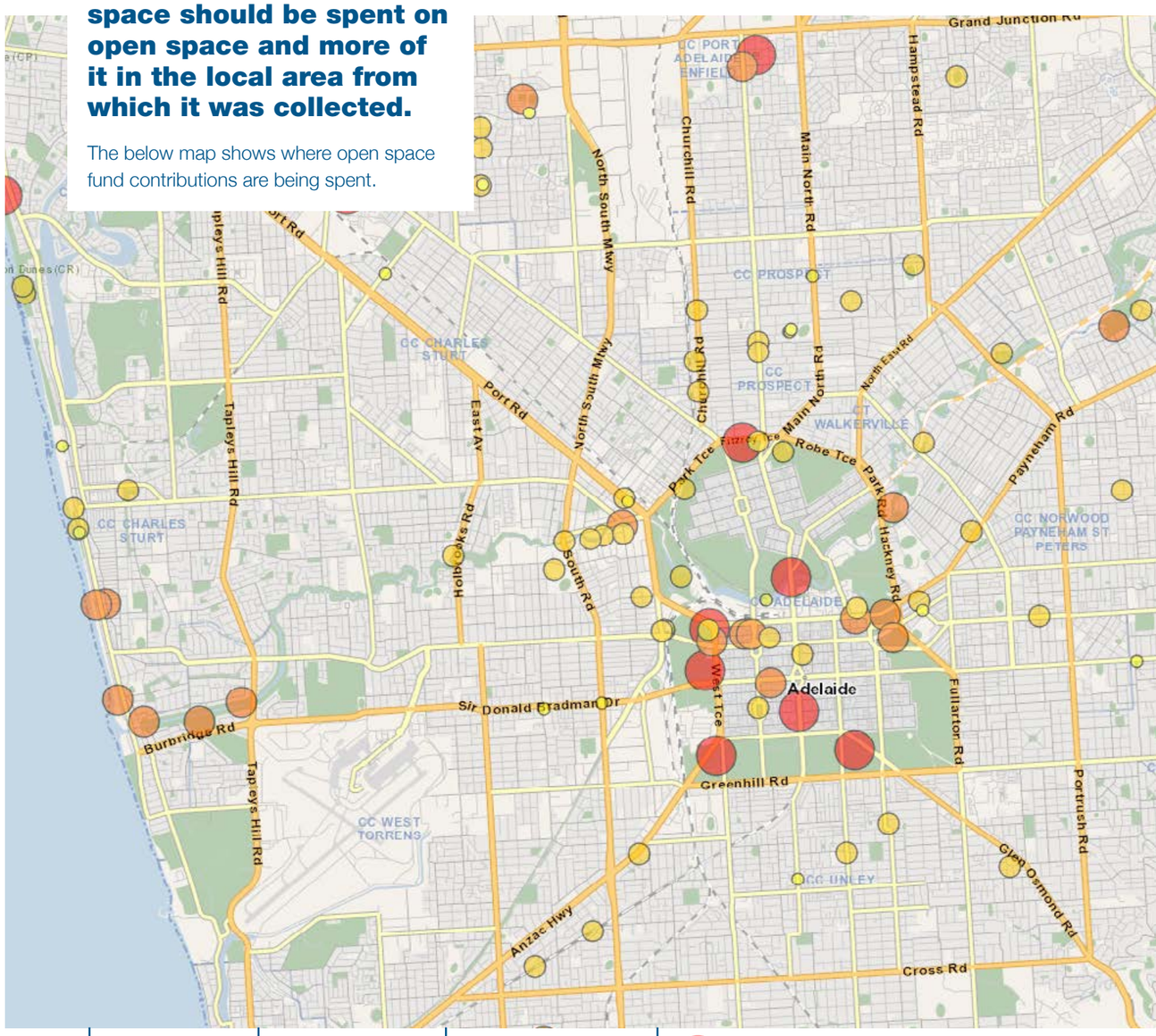
Better planning will benefit residents in the long term and maximise the contributions the developers make through their future investment decisions.

The framework should also provide flexibility to work with developers of large strategic infill sites so that developers can utilise the contributions in that development area, thereby benefiting the new residents and also those who live nearby.

Large strategic infill sites provide exciting opportunities to provide new, innovative and useable open spaces for surrounding residents, and by leveraging the investment by developers, even more can be achieved.

Every dollar contributed by homebuyers to open space should be spent on open space and more of it in the local area from which it was collected.

The below map shows where open space fund contributions are being spent.



Source
location.sa.gov.au

River Torrens Linear Park

Even though Linear Park is a stormwater management space, the River Torrens delivers an important visual amenity, environmental quality, micro-climatic impact and recreational value, regardless of an individual's inability to occupy the water body itself. Quality open spaces such as Linear Park should be considered as prime open space.

Many councils also impose a minimum open space size on the pretence that it is cheaper to maintain a few larger spaces than a larger number of smaller spaces. Sometimes this could resulting in nothing more than dry land grassed areas that are slashed by a ride-on mower twice a year.

The development of smaller areas of open space but to a much higher standard of usability and visual amenity should be our goal, to ensure that a greater number of residents are in closer walking distance to a reserve.

Challenge

Growth areas

In growth areas and larger sub-divisions, the development contribution of 12.5% of open space is often problematic due to the outdated framework.

South Australia needs a contributions system which dedicates open space funds to the area in which they are collected and recognises the contemporary ways in which multipurpose open spaces can provide valuable amenity.

Currently, councils typically discount the contribution value of open space where it has a dual use, for example open spaces with stormwater detention facilities. This is the case notwithstanding there are numerous examples of successful combinations of open spaces and stormwater management throughout metropolitan Adelaide, where storm water infrastructure, such as storm water retention and detention basins, can provide strong local aesthetic amenity, recreation and biodiversity opportunities.

With more innovative and alternative uses recognised as legitimate and desirable uses of open space, not only can our suburbs feature better quality spaces, but also improve housing affordability.

Read the UDIA Submission to Parliament of South Australia Natural Resources Committee for the Inquiry into urban green spaces, on the UDIA website.

The UDIA provided a list of important factors that should be considered how these contributions need to be spent.

Smaller 'pocket reserves' can be designed and delivered with sustainable maintenance in mind when considered as part of a broader integrated open space scheme.

Penneys Hill Estate, Hackham

Recommendations

R4. Facilitate better urban amenity and accessibility by committing to reviewing and reforming operation of the Planning and Development Fund and open space contributions to create a fairer, more flexible and effective system that is reflective of contemporary development trends including:

a. The requirement for each council to develop and publish an open space strategic plan outlining the objectives, maintenance and investment plans approved by the state government.

b. State government to develop a metropolitan wide open space plan encompassing each council area.

c. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it annually by post code.

d. Mechanisms for more contributions made to the open space fund to be accessible for use in the areas collected for a wider range of uses.

e. Repealing parts of the PDI Act to prohibit the use of open space contributions for departmental systems or operational expenditure.

R5. Reviewing and reforming the operation of the PDI Act and regulations to create a fairer, more flexible and effective system reflective of contemporary development trends in new development areas that:

a. Incorporates all open space uses into the 12.5% contribution at 100% value towards that open space contribution, where the land can be demonstrated to have one or more of a revised list of open space values such as those identified earlier.

b. Restricts the ability to impose unreasonable minimum open space areas on individual reserves by recognising within the Planning and Design Code the multiple uses and sizes of reserves required to serve a multitude of functions, where the quality and functional relevance of the space can be demonstrated.

c. Recognises the value of landscaped streetscapes and urban plazas as major contributions to urban amenity which should form part of the contribution towards open space.

build

Better and more community infrastructure

A key component of successful growth is the provision of infrastructure.

To successfully grow our population and economy, much more work on planning and increased investment for trunk infrastructure, roads, stormwater and public transport is required. Without it, our liveability is at risk.

Challenge

The missing middle of infrastructure

At a local level, developers deliver transport, social and environmental infrastructure, some even provide schools and childcare facilities, retail precincts and medical services — they are rising to the challenge.

State and Federal government partnerships provide much of the major infrastructure such as expressways. For some areas in the north that are booming (much like Angle Vale), it's no surprise the Northern Connector and Northern Expressway have played a crucial part in that.

The biggest challenges we face are what might be described as the 'missing middle of infrastructure'. It's the type of infrastructure joining suburbs and communities together and it has been overlooked.

Currently, developers fund and build vast amounts of infrastructure, while state and local government infrastructure such as connecting roads and schools are frequently lagging — often not built until there is a public outcry or call for it.

The infrastructure challenges we face are symptomatic of an absence of a coordinated vision and the sharing of responsibilities between state and local government — which usually means that no one takes the lead with blame shifted to the development sector.

The PDI Act and other pieces of legislation are deficient in this area, both in the identification and measurement of what is required and the different views of councils about the infrastructure they require.

An added problem is that Infrastructure SA has not made this a key area of focus and is also relying on an under resourced State Planning Commission take the lead.

With more strategic leadership, planning and emphasis on a coordinated approach, the incoming state government can invest in this infrastructure upfront and with more confidence.

King William Road redevelopment

The Northern Expressway and the Northern Connector have been game-changers in terms of developments being able to occur in those areas.

In time, different developments in the north will become connected suburbs and government must take the lead. People in growth areas like the north of Greater Adelaide are no less entitled to access to public transport, good schools and other infrastructure than anyone else.

Read the UDIA 20-Year State Infrastructure Strategy Discussion Paper submission

Challenge

Cost of essential utility infrastructure

Similarly, a corporatised and privatised provision of trunk infrastructure through regulatory regimes that are governed by different legislation does not allow for the best coordination, pricing and efficient delivery of key infrastructure for an innovative urban development.

In addition to state and local government infrastructure, it is critical that we revisit third party access rules for all essential infrastructure. If South Australia is to have a user pays system, it cannot exist in the absence of competitive alternatives to lower costs for developers and ultimately consumers.

A future state government should commit to the bring all these disparate interests together so that efficiencies can be unlocked and more and better infrastructure can be delivered.

Recommendations

B1 Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.

B2 Create an Urban Futures Infrastructure task force that includes representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.

B3 Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.

B4 Within 12 months of election, review and reform all legislative mechanisms that guide infrastructure access, standards, levels of competition and pricing related to urban development by state and local government.

2019 UDIA Infrastructure Roundtable

As a thought leader on this issue, the UDIA called for a more collaborative and coordinated utility infrastructure delivery strategy for South Australia in its Grow Reform Build platform released in early 2018.

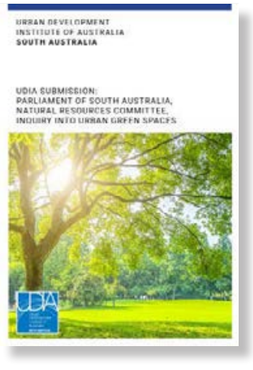
This call was also made in the context of the legislative requirements under the Planning Development and Infrastructure Act that requires the State Planning Commission to report on land supply.

Stop taxing production of housing

The more supply of housing provided, the lower prices are kept and housing affordability is improved. That's why it is important to do all we can to ensure the development process and environment for business is as efficient as possible.

Challenge

Create environment that supports more efficient delivery



Read the UDIA Submission to Parliament of South Australia Natural Resources Committee for the Inquiry into urban green spaces, on the UDIA website.

The UDIA provided a list of important factors that should be considered how these contributions need to be spent.

Along with a myriad of risks and other challenges in the development process, one factor impacting the supply of housing is the imposition of land tax on developers if they hold stock unsold as at 30 June.

Most developers are not long-term landowners that receive rent, however they are treated as such so charges are passed on to home buyers as part of the sale price.

The current system discourages developers from developing large land holdings which can impact supply through certain parts of the year. It means developers are forced to produce smaller stages and stop operating as efficiently as they otherwise could, leading to higher prices. In some cases, it means a total halt to production — the consequence if they don't is to raise prices.

A consumer could end up paying an additional $4,000 as a result — an amount that gets added to the price and generally the value of a mortgage. When one considers that this is borrowed by the homebuyer for the life of their loan, the cumulative effect to that homeowner is massive.

In a report prepared by the South Australian Centre for Economic Studies, an independent analysis was completed around the operation of land tax and impacts on the development sector. The report recognised the issues faced by the development sector and made specific recommendations that land tax exemptions should exist for the development sector.

State government schemes exist in both Queensland and Western Australia recognising this very fact and providing mechanisms to address it. We are calling on an incoming South Australian government to implement a sensible reform that does not discourage the production of new housing.

Recommendation

B5 The UDIA calls on a new state government to introduce land tax exemptions for recently created titles held by developers as trading stock that remain unsold as at 30 June.

Recommendation Summary

Grow

G1	Create and fund a cross-government task force led by the State Planning Commission with representation from the building and development sector to develop a new housing affordability and ownership action plan.
G2	Allocate responsibility and accountability for housing affordability and liveability across all government ministerial portfolios.
G3	Incorporate a Housing Affordability and Sustainability Impact Statement into all relevant Cabinet submissions to ensure cost impacts of new policies on consumers are minimised.
G4	Implement a continuing requirement for a State Government review of the cost impact of all policy decisions on construction and development standards.
G5	Create focus on housing affordability and ownership by considering appropriate amendments to the Planning Development and Infrastructure Act 2016 and associated regulations.
G6	Commit to an investigation of economic reform for the provision of housing in South Australia including: a. The development of a regulatory impact statement on all fees, charges and regulations related to the provision of housing b. A transitionary pathway to reducing reliance on inefficient taxes and charges c. Options for the deferral of up-front taxes and charges for consumers to improve affordability d. Immediately abolishing stamp duty on all new residential, owner occupier, off the plan housing construction below the median house price to improve affordability and increase housing supply.
G7	Commit to a moratorium on new value capture taxes and charges.
G8	Commit to a moratorium on new or changed inclusionary zoning policies without engagement and agreement of the development sector.
G9	Invest in the development of a new real time electronic urban development monitoring tool in partnership with the UDIA, to improve state-wide planning for growth, liveability and affordability, and encourage increased private sector investment.
G10	Develop a new 30-Year Plan for Greater Adelaide[17] by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity (see recommendation B1).
G11	Implement recommendations provided to the State Government and State Planning Commission in response to the recent Environment and Food Production Area review and in particular: a. Ensure Regional Plans for Greater Adelaide is premised on multiple scenarios and builds in appropriate growth opportunities in locations which are sought by the market. b. Address the over reliance in housing supply of single dwelling subdivisions and instead proactively and urgently increase land supply in market responsive locations including greenfield and large-scale brownfield areas.
G12	Independently review the operation and effectiveness of the new PlanSA e-Planning system and its impact on affordability through consultation with the development sector, councils, and utilities.

17 Referred to regional plans under the PDI Act.

Recommendation Summary

Reform

R1	Enforceable guidelines are implemented so that: a. Developer contributions are fit for purpose and relate to the development project in question b. Genuine competition and best pricing principles address monopolistic behaviour.
R2	State and local government agency requirements (including utilities) can be reviewed and contested to ensure that they are not cross subsidising other activities unrelated to the development.
R3	Contributions already collected by state and local government must be reported and audited annually with detailed plans and timeframes for their use.
R4	Facilitate better urban amenity and accessibility by committing to reviewing and reforming operation of the Planning and Development Fund and open space contributions to create a fairer, more flexible and effective system that is reflective of contemporary development trends including: a. The requirement for each council to develop and publish an open space strategic plan outlining the objectives, maintenance and investment plans approved by the state government. b. State government to develop a metropolitan wide open space plan encompassing each council area. c. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it annually by post code. d. Mechanisms for more contributions made to the open space fund to be accessible for use in the areas collected for a wider range of uses. e. Repealing parts of the PDI Act to prohibit the use of open space contributions for departmental systems or operational expenditure.
R5	Reviewing and reforming the operation of the PDI Act and regulations to create a fairer, more flexible and effective system reflective of contemporary development trends in new development areas that: a. Incorporates all open space uses into the 12.5% contribution at 100% value towards that open space contribution, where the land can be demonstrated to have one or more of a revised list of open space values such as those identified earlier. b. Restricts the ability to impose unreasonable minimum open space areas on individual reserves by recognising within the Planning and Design Code the multiple uses and sizes of reserves required to serve a multitude of functions, where the quality and functional relevance of the space can be demonstrated. c. Recognises the value of landscaped streetscapes and urban plazas as major contributions to urban amenity which should form part of the contribution towards open space.

Recommendation Summary

Build

B1	Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.
B2	Create an Urban Futures Infrastructure task force that includes representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.
B3	Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.
B4	Within 12 months of election, review and reform all legislative mechanisms that guide infrastructure access, standards, levels of competition and pricing related to urban development by state and local government.
B5	The UDIA calls on a new state government to introduce land tax exemptions for recently created titles held by developers as trading stock that remain unsold as at 30 June.

Sources

Page	Source	Source Link
14	sa.gov.au	*https://www.sa.gov.au/topics/planning-and-property/researching-a-property/median-house-sales-by-quarter*
15	sa.gov.au	*https://www.sa.gov.au/topics/planning-and-property/researching-a-property/median-house-sales-by-quarter*
15	Australian Government Productivity Commission Industry report — First Home Ownership, March 2004	*https://www.pc.gov.au/inquiries/completed/first-home-ownership/report/housing.pdf* chapter 1, page 3
17	2021 Demographia International Housing Affordability	*http://www.demographia.com/dhi.pdf*
17	CoreLogic	*https://news.anz.com/content/dam/news/articles/2021/November/ANZ_CoreLogic_Housing_Affordability_Report_2021_Final_lr.pdf*
19	2021–22 State Budget	*https://www.statebudget.sa.gov.au/budget-papers/2021-22-Budget-Statement.pdf*
23	Grattan Institute	*https://grattan.edu.au/wp-content/uploads/2018/03/901-Housing-affordability.pdf*
26/27/28	Land Supply Report for Greater Adelaide, Plan SA	*https://plan.sa.gov.au/state_snapshot/land_supply/land_supply_reports_for_greater_Adelaide*
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Urban Development Institute of Australia (SA)
Suite 102 (Level 1)
26 Flinders Street
Adelaide SA 5000

udiasa.com.au
08 8359 3000
udiasa@udiasa.com.au

Policy enquiries
policy@uniasa.com.au

Event enquiries
events@udiasa.com.au

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Urban Development Institute of Australia
SOUTH AUSTRALIA

e udiasa@udiasa.com.au
t 08 8359 3000
w www.udiasa.com.au

Urban Development Institute of Australia
(South Australia) Inc.
Level 1, 26 Flinders Street
Adelaide SA 5000

16 December 2022

Expert Panel
GPO Box 1815
Adelaide SA 5001

Dear Expert Panel Members,

Re: Planning System Implementation Review

Thank you for providing the Urban Development Institute of Australia SA (UDIA) with the opportunity to respond to the Expert Panel conducting the Planning Reform Implementation Review.

In addition to the deputation submission previously made, please find attached a full submission addressing questions of the panel and discussion paper topics. This includes a summary of *Key Recommendations* which we believe are the most critical and essential matters that must be addressed with a sense of urgency to address the current housing crisis. Further information can also be found in submissions previously made by the UDIA to the State Planning Commission (attached).

Since the expert panel review of the planning system in 2012, the subsequent introduction of the *Planning Development and Infrastructure* (PDI) *Act 2016* and the implementation of the new electronic Planning and Design Code, many significant and important enhancements have been made to ensure our state's planning system is modern, user friendly and a solid foundation for adaptive and flexible policy and assessment.

While there are many areas for improvement, we do not believe that the system is "broken" nor requires extensive changes, particularly as it relates to the interface between authorities, proponents and the community.

We do however firmly believe there is a critical imperative to consider the broader objectives in totality because without doing so, a number of the technical and detailed questions posed could conceivably result in a series of suggestions and policies that would seem worthwhile when considered in isolation, but in the broader context could have more wide-ranging unintended consequences. It is only when considering the wider context and the broader goal or "problem to be fixed" can the best solutions be identified.

While many of the Planning System Implementation Review discussion points consider the delivery of the new system, the UDIA notes that the terms of reference and much public discourse often refers to strategic planning policy and directions. We are pleased that the Expert Panel has recognised this and invited a broad range of matters where it states in the first discussion paper, "…the Panel is, of course, interested to hear about all ideas for reform that may benefit the South Australian community and encourages you to raise any matters that have not otherwise been canvassed in this Discussion Paper".

As outlined in previous UDIA submissions to the State Government and most recently in the UDIA's **Grow.Reform.Build**. document published prior to the 2022 State Election, as a membership body we are uniquely placed to see and experience first-hand what South Australian's value most about the places they live.

We also see and experience each of the different and competing interests of policy makers, agencies and levels of government, and how they are often at odds with each other. From a state-wide perspective, we see that without necessary and thorough planning, development can adversely change the character of our existing suburbs and streets. We see the impacts of a lack of investment in public transport, roads and trunk infrastructure and how this neglect can quickly lead to the same congestion and 'growing pains' being experienced interstate.

The UDIA believes that a key focus for our state now and into the future should be for South Australia to continue and unquestionably be the place where people can still achieve the great Australian dream.

Home ownership means different things to different people — for some it is in a compact denser neighborhood or apartment, for others it is a place where you can have a trampoline, trailer and a dog.

For those that can't afford to invest in purchasing a home, the certainty that comes with knowing a place to rent is affordable and available, in an area that they are attached to or familiar with, can make a significant difference to their overall wellbeing.

We know that a place to call home offers an undeniable sense of safety, security, and stability — a fundamental human need as defined in Maslow's Hierarchy of Needs — and is a proven pathway to intergenerational prosperity.

We hope that these key objectives continue to remain in the forefront of the Expert Panel's considerations.

Yours sincerely,

[redacted]

Pat Gerace
CHIEF EXECUTIVE

KEY RECOMMENDATIONS

Land Supply

The UDIA seeks to ensure there is a pipeline of development-ready land and has concerns relating to inadequacies in existing land supply measurements.

Our comments regarding the current framework are:

- Schedule 4(1) and section 7 of the Planning, Development and Infrastructure Act (PDI) obligates the State Planning Commission to review land supply at least once every five years and we believe the five-year review period is too infrequent.
- Land supply issues combined with changing economic circumstances have caused a housing affordability crisis and these factors make the timeframe for reviews more urgent.
- Land supply and "development ready" land reports do not adequately factor in critical delivery elements such as infrastructure delivery, approval process delays and the political decision-making process.
- The current monitoring of land supply is inefficient, and the Urban Development Institute of Australia (UDIA) proposes a different model (currently under development in conjunction with National Housing Finance and Investment Corporation).

A substantial amount of information on this matter is included in the UDIA submission to the State Planning Commission on the review of the Environment and Food Production Area (attached).

Infrastructure Coordination

All of society benefits from new infrastructure. Even those far away from a new piece of major transport infrastructure may indirectly benefit, while those living, working, or investing in close proximity benefit both directly and indirectly.

- The early identification and adequate scoping of urban infrastructure is lacking
- The UDIA believes the cause is that no single or appropriate authority has been tasked with the early planning and scoping of urban infrastructure for growth areas.
- The infrastructure challenges are caused by an absence of a coordinated vision and the sharing of responsibilities between state and local government
- A lack of Government control leads to blame and responsibility being novated to the development sector
- The PDI Act and other pieces of legislation are deficient in this area, both in the identification and measurement of what is required and the different views of councils about the infrastructure they require.
- Infrastructure SA has not made this a key area of focus and is also relying on an under-resourced State Planning Commission to take the lead
- Corporatised and privatised delivery of trunk infrastructure through regulatory regimes that are governed by different legislation does not presently allow for the best coordination, pricing and efficient delivery of key infrastructure for an innovative urban development.

In the absence of a coordinated comprehensive government owned and regulated infrastructure delivery system it is appropriate that we revisit third party access rules for all essential infrastructure. If South Australia is to have a user pays system, it cannot exist in the absence of competitive alternatives to lower costs for developers and ultimately consumers.

The UDIA believes that the state government should commit to bringing all disparate interests together so that efficiencies can be unlocked and more and improved infrastructure can be delivered. The UDIA suggests:

- Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.
- Create an Urban Futures Infrastructure task force comprising representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.
- Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.

Infrastructure Schemes

The UDIA played a key role in the impetus for a new alternative in the PDI Act for the apportionment of infrastructure costs in new development areas with multiple landowners.

- UDIA's suggested provisions for infrastructure schemes and a Scheme Coordinator did not get adopted in the drafting of the PDI Act
- The UDIA strongly advocates for a Scheme Coordinator to manage infrastructure schemes and be involved in the early identification and scoping of urban infrastructure for growth areas
- The Scheme Coordinator would be a nominated person with a strong charter to be measured against to ensure appropriate performance, together with appropriate support staff and authority to resolve negotiations with other state or local government authorities, service authorities, developers and landowners.
- The UDIA suggests better planning through Infrastructure SA and a taskforce, enforceable guidelines for developer contributions, up-front funding and use of a Scheme Coordinator for infrastructure schemes to begin resolving infrastructure delivery issues within South Australia.
- A detailed UDIA submission in relation to infrastructure schemes operation and the use of development deeds was made in the recent investigation conducted by Deloitte on behalf of Planning and Land Use Services (PLUS) (attached)[1]

New 30 Year Plan

- UDIA recommends that the new 30-Year Plan for Greater Adelaide be developed by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity

[1] *UDIA Submission on Developer Deed Review and Infrastructure Schemes, 2022*

- The UDIA strongly supports the continued supply of master planned neighbourhood-type zones which provide the necessary flexibility for developments to evolve and respond to the housing market.
- UDIA's position is that strategic infill is a preferable way to increase housing density and diversity over general infill.
- The new 30-Year Plan should identify more large-scale strategic infill projects and work to unlock medium to higher density projects in appropriate areas.
- Strategic infill provides optimum opportunity to master plan the regeneration of areas, better infrastructure co-ordination and urban outcomes
- The UDIA continues to call for improved and more detailed planning, based on better data and an understanding of what people need and value, and how the market is likely to respond.
- Well planned redevelopment with scale will be more sustainable and can include open space and opportunities to upgrade infrastructure.
- The UDIA does not support the inclusion of infill-type policies (that are used to address higher densities in existing suburbs) in master planned areas as it unnecessary and counterproductive to good urban outcomes where innovation and the benefit of master planning can achieve even better outcomes
- The 30-Year Plan and PDI Act should address housing affordability by acknowledging and addressing the hidden cost of land and housing imposed by taxation, regulatory charges and development delays.

Role of Urban Infill

- UDIA believes that without necessary and thorough planning, ad-hoc general infill development can adversely change the character of our existing suburbs and streets and note that much of the public discussion and policy questions raised in this review relates almost entirely to general infill.
- The UDIA believes that the impact of all potential policy recommendations resulting from this should be accompanied by a commensurate consideration and action to increase alternative land and housing supply measures.
- The UDIA believes there should be a reduction in general infill development and refocus on strategic infill in identified sites and this should be carried out together with a more realistic appraisal of the development ready pipeline for major greenfield developments
- Modelling should investigate what significant reductions in general infill will mean as the Government recognises considerations such as character and heritage areas, increases in rates of tree retention, and reduction of on-street parking.
- The Planning and Development Fund expenditure should be reflective and commensurate to where the contributions are coming from, so that a fairer system is in place to spend the money where it is needed. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it should be made annually by post code.

Development Assessment and Planning and Design Code Improvements

- A number of suggestions have recently been provided to PLUS as part of 'Miscellaneous Technical Enhancement Code Amendment' (MTECA). This submission is attached for reference.[2]
- One of the continuing concerns most often voiced by the sector is the matter of referrals and the power of 'Direction' afforded to referral agencies effectively making them a 'quasi' planning authority with the power to veto any determination of the relevant authority.
- Each agency effectively acts as a separate authority, requiring multiple approvals from multiple authorities for the one development application. The power of 'Direction' also provides significant power to agencies to 'leverage' their authority to achieve outcomes beyond the purview of the referral.
- One example are referrals related to the Environment Protection Authority (EPA). We reiterate our previous concerns that site contamination policy suite 'front loads' the assessment of site contamination to require considerable cost and delay before planning consent is issued. The UDIA seeks that Practice Direction 14's referral trigger (and potentially the regulations) put that requirement as a condition at the 'back end' once planning consent has been granted.
- Other referrals and Planning and Design Code matters requiring attention are Native Vegetation Clearances, Code Amendments and the application of Affordable Housing Overlays
- The dysfunction of these referrals and the nature of the process adds cost, reduces efficiency, and does not improve the outcomes for affordability, native vegetation etc.

[2] *UDIA Submission to the State Planning Commission on Miscellaneous Technical Enhancement Code Amendment (MTECA)*

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1. Planning and Development Legislation

1.1. Land Supply [3]

The UDIA believes that there should be and adequate pipeline of development ready land and have concerns relating to inadequacies in existing land supply measurements.

Schedule 4 of the PDI Act identifies the obligations of the Minister for Planning ('Minister') and the State Planning Commission ('Commission') to set performance targets in relation to any goal, policy or objective under a state planning policy or planning agreement. Based on the current aspirations and targets of the state planning policies and of the 30-Year Plan for Greater Adelaide, there is faculty to review the available land supply across *Greater Adelaide*, and to subsequently implement changes to accommodate population growth, and respond to housing choice and affordability.

Schedule 4(1) of the PDI Act, obligates the Commission to review, at least once every 5 years, the housing and land supply targets outlined in the state planning policies.

These are coupled with the land supply review requirements applicable to Environment and Food Production Areas under section 7 of the PDI Act.

The five-year review period is simply too infrequent. Through our observations, this is, and will continue to be, a foundational issue to the inadequacies in land supply across Greater Adelaide and prolong the housing affordability crisis.

Land supply issues and lack of affordable housing has been further exacerbated over recent years by the sharp changes in economic, social and environmental influences (national and global). In our opinion, this further exposes the lethargy of the review process and lack of legislative responsiveness. We are also of the understanding that the Commission is inadequately resourced (including dedicated staff and independent research capability), for what is arguably one of the most important roles of the State.

We also suggest that the current land supply reviews rely upon population forecasts and land use patterns across Greater Adelaide as a whole, rather than assessing sub-regions of Greater Adelaide or specific markets. We have previously raised concerns about the use of Land Supply Reports and the assumptions underpinning the reports. Whilst it is pleasing that the assumptions are in the process of being revised, the approach of assessing land supply holistically (i.e., across the entire Greater Adelaide regions) as compared to a sub-regional level remains highly problematic.

Modelling should account for a reduction in general infill to reflect more character / heritage areas, more tree retention, reduction in on-street parking loses etc. The realistic rate of development of major land developments should also be factored into the assumptions. While an area may have over 15 years' land supply, development on the ground will take far longer due to the lengthy process of making allotments 'development ready'. Furthermore, the delivery of land in known supply pipelines can be compromised by delays in Code Amendments / approvals processes / political decisions / government infrastructure coordination. A further reduction in yield should be applied to address these factors.

Rather than shaping Adelaide in the most appropriate way to take account of new trends in living patterns or addressing affordability to maintain Adelaide's livability, it appears the reports have significant weight in the decision process for rezoning land. Incorrect assertions about excess land supply have too often been used as a reason for constraining or preventing new housing development because of the government's reluctance to invest in infrastructure, which unfortunately is at the expense of the primary driver in maintaining housing affordability, namely competitive market tension.

[3] *UDIA Submission on Land Supply Reports and State Planning Commission EFPA review.*

We note that Section 6 of the PDI Act makes provision for the Minister to establish a sub-region (including within Greater Adelaide). We are of the strong opinion that sub-regions should be established otherwise Greater Adelaide as a planning region will continue to under deliver upon the long-term strategic land supply and housing needs, based on outdated assumptions. Without the establishment of sub-regions within Greater Adelaide, South Australia will continue to face a great hurdle in being able to quickly respond to affordability challenges in the future — challenges already being experienced in many parts of Greater Adelaide.

The UDIA has been very clear that it does not support the inclusion of the Environment and Food Protection Areas within legislation. The framework is flawed and designed so that there would never be any changes. To our knowledge there has been no scientific and objective analysis of the current boundary as it relates to soil types, average rainfall, agricultural yields, or native vegetation which one could reasonably expect would be considered when implementing such a restriction. As a result, we are now faced with a situation where the supply of land and affordability of housing in certain areas is at a very significant risk as a result.

We recommend the Government devise and implement a dynamic housing demand and supply monitoring program using live data and reporting publicly on a quarterly basis in conjunction with the UDIA. This, in conjunction with the ability to amend growth boundaries for specific regions, sub-regions and townships on an as-needs basis, is the key to unlocking land supply and addressing the affordability crisis.

The UDIA strongly supports strategic infill within metropolitan Adelaide, as distinct from general infill. It is general infill which has caused considerable community angst and been a principal driver behind the Commission's implementation of overly onerous planning guidelines for infill development.

Alternative forms of infill development need to be considered in order to support housing diversity and choice and support the delivery of affordable housing. Generally, such should primarily remain within the realm of strategic infill, as we are of the view that master planned developments provide the best opportunity to manage issues of sensitivity to the community.

Identifying future infill development opportunities should be a key responsibility of the State Planning Commission, ensuring a strategic lens is applied. Many Councils are not undertaking strategic planning which has forced proponents to lead Code Amendments in order to unlock identified opportunities.

The UDIA submit that the current numerous impediments to rezoning land for strategic infill need to be addressed, as this is limiting the delivery of alternate and affordable housing forms.

1.2. Infrastructure[4]

1.1.1 Infrastructure Planning

The UDIA believes that the state government should commit to bringing all disparate interests together so that efficiencies can be unlocked and more and better infrastructure can be delivered.

All of society benefits from new infrastructure. Even those far away from a new piece of major transport infrastructure may indirectly benefit, while those living, working, or investing in close proximity benefit both directly and indirectly.

[4] *UDIA Submission on Developer Deed Review and Infrastructure Schemes, 2022*

- The early identification and adequate scoping of urban infrastructure is lacking
- The UDIA believes the cause is that no single or appropriate authority has been tasked with the early planning and scoping of urban infrastructure for growth areas.
- The infrastructure challenges are caused by an absence of a coordinated vision and the sharing of responsibilities between state and local government
- A lack of Government control leads to blame and responsibility being novated to the development sector
- The PDI Act and other pieces of legislation are deficient in this area, both in the identification and measurement of what is required and the different views of councils about the infrastructure they require.
- Infrastructure SA has not made this a key area of focus and is also relying on an under-resourced State Planning Commission to take the lead
- Corporatised and privatised delivery of trunk infrastructure through regulatory regimes that are governed by different legislation does not presently allow for the best coordination, pricing and efficient delivery of key infrastructure for an innovative urban development.

In the absence of a coordinated comprehensive government owned and regulated infrastructure delivery system it is appropriate that we revisit third party access rules for all essential infrastructure. If South Australia is to have a user pays system, it cannot exist in the absence of competitive alternatives to lower costs for developers and ultimately consumers.

The UDIA believes that the state government should commit to bringing all disparate interests together so that efficiencies can be unlocked and more and improved infrastructure can be delivered. The UDIA suggests:

1. Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.
2. Create an Urban Futures Infrastructure task force comprising representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.
3. Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.

1.2.2 Infrastructure Schemes

Developer contributions require enforceable guidelines so that contributions are fit for purpose, fair and relate to the development project in question. The process and expenditure must be clear and transparent, reviewed, reported and audited.

Various infrastructure funding models including value capture, infrastructure levies and the mechanics of developer contributions can have an effect on housing affordability and the first home buyer in new developments. Infrastructure levies / developer contributions are ultimately a tax on the first home buyer in new developments (costs are generally transferred from developer to purchasers), with other taxes compounding (e.g., stamp duty). Increases, mismanagement or over-pricing of these levies/contributions strikes at the heart of affordability for new home buyers.

The UDIA played a key role in the impetus for a new alternative in the PDI Act for the apportionment of infrastructure costs in new development areas with multiple landowners. Unfortunately, during creation/drafting of the PDI Act, and subsequent legislative amendments, much of the UDIA's suggested provisions for infrastructure schemes and a Scheme Coordinator, were watered down due to political pressure from other interest groups that were vehemently opposed to any form of developer or landowner contributions.

The UDIA does not believe that any wholesale reform is required, rather the knowledge and real-life experience gained in past developments such as at Mt Barker can be used to modestly refine the methodology for infrastructure deeds with more successful outcomes.

The early identification and adequate scoping of urban infrastructure is sadly still lacking. The UDIA believes this is largely because no single or appropriate authority has been tasked with the early planning and scoping of urban infrastructure for growth areas.

A detailed UDIA submission in relation to infrastructure schemes operation and the use of development deeds was made in the recent investigation conducted by Deloitte on behalf of Planning and Land Use Services (PLUS) (attached)[5]

The UDIA strongly advocates for a Scheme Coordinator to manage infrastructure schemes and be involved in the early identification and scoping of urban infrastructure for growth areas. The Scheme Coordinator would be a nominated person with a strong charter that they could be measured against to ensure appropriate performance, together with appropriate support staff and authority to be able to resolve negotiations with other State or Local Government authorities, service authorities and developers/landowners.

Despite having the largest balance sheet and ability to source funds at cheaper rates then other parties, there has been a reluctance for Government to fund infrastructure up front. Having no up-front capital or funding to commence the construction of infrastructure is impractical and inefficient as it results in the need to wait for the receipt of development contributions to then fund infrastructure.

Investment in infrastructure needs to be made up-front, with the developer contributions to follow later. The timing and outlay of infrastructure can still be managed appropriately so it is completed sensibly and efficiently. Early creation of infrastructure unlocks greater development potential, which generally translates into earlier receipt of developer contributions from more active development.

It is important for SA to have a range of tools available to manage developer contributions and infrastructure delivery. For instance, for very large Government land parcels specific negotiated indentures can be the most effective, as was used for projects like Mawson Lakes or Golden Grove. For growth areas with multiple land holdings and infrastructure traversing across the various land holdings, the infrastructure deeds can be effective when set-up and managed appropriately. Infrastructure schemes envisaged by the UDIA could also be effective. For smaller, simpler projects an individual Council Separate Rate could be the most efficient method.

The establishment of Joint Planning Boards under section 36 of the PDI Act and the use of the *Urban Renewal Act 1995* are other options to consider.

1.2.4 Vesting of open space and roads

The present planning system enables councils to control, block or take leverage over land division developments by withholding consent to the vesting of roads and open space, including in circumstances

[5] *UDIA Submission on Developer Deed Review and Infrastructure Schemes, 2022*

where the council is not the relevant planning authority for the development.

The PDI Act contains a number of provisions relating to applications for the division of land and associated matters such as the provision of land for open space purposes (and/or a monetary contribution in lieu of the provision of open space land).

These provisions of the PDI Act have been relied upon by certain councils to frustrate developments by refusing to consent to the vesting of roads and open space, or only consenting to the vesting upon particular conditions.

Various assertions have been made about the operation of these provisions, including that:

- councils retain absolute discretion about whether or not to accept the vesting of roads and open space, and on what terms;
- the decision on vesting is to be made independently to the grant of planning consent and land division consent;
- the decision on vesting may be a decision capable of being exercised by the elected members, or other arms of a council than its Assessment Panel and planning staff, taking the decision outside of the planning system altogether;
- the decision on vesting is largely unconstrained by the Planning and Design Code or any particular planning policies or objectives;
- the State Planning Commission (and SCAP as its delegate) lacks the power to ultimately determine the configuration of roads and open space in a land division for which it is the relevant authority; and
- the decision on vesting may not be appealable to the ERD Court and the ERD Court may lack the jurisdiction to determine the issue in the course of a planning appeal.

Issues relating to vesting are being experienced by a number of developers and appear to be increasingly utilised by councils. In some cases, there are real concerns that the provisions are being used for ulterior purposes.

The interpretation being adopted by some councils fundamentally undermines the ability of a relevant authority (including Council or Regional Assessment Panels, SCAP, the Minister and potentially the ERD Court) to determine land division applications.

This has led to circumstances where a relevant authority (such as SCAP) has granted planning consent, upon, amongst other things, being satisfied with the provision of open space, only for a council to purport to decline to have the open space vested in the council. Councils are taking the position that by declining to consent to the vesting of open space (and other land) they are capable of frustrating the planning consent granted by the relevant authority.

This interpretation has the potential effect of rendering the planning decision of the relevant authority futile pending the attitude of the council to the proposed development.

The issue is capable of being fixed through relatively simple amendments to sections 102 and 198 of the PDI Act.

1.2.5 Model Bonding Agreements

Bonding Agreements and Infrastructure Agreements with councils are commonly used by developers to secure the release of new certificates of title in a land division before the associated civil works are fully complete. However, the process of negotiating Bonding Agreements can in itself be a source of

additional cost and delay for developments. It is not uncommon to see councils seek to require that developers continue to maintain public reserves well after a development is completed.

For well over 20 years the planning system in South Australia has provided the ability for the Minister to publish a model bonding agreement for use by developers and councils across the State. That power, which is currently found in Regulation 87(3) of the PDI (General) Regulations has never been acted upon.

The UDIA would support discussion around the creation of a model bonding agreement for use across the sector.

Infrastructure Schemes

1. What do you see as barriers in establishing an infrastructure scheme under the PDI Act?

   A key barrier to establishing an infrastructure scheme is that they require up-front funding in order to ensure the early provision of infrastructure. The current system does not provide any certainty when key infrastructure will be delivered, noting that the responsibility for delivery often includes developers, state agencies and Councils.

2. What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?

   A Scheme Coordinator is essential to the delivery of infrastructure schemes. A Scheme Coordinator would act as a facilitator and final arbiter of the terms of agreement for infrastructure schemes for recommendation to the relevant Minister.

   The Act could also be amended to formally require strategic urban infrastructure planning to be undertaken and integrated with Regional Plans and preferably at a Sub-regional level. Timeframes for delivery need to be identified and reinforced. Such provides greater stakeholder certainty and confidence in the planning process.

   Ultimately, the Government needs to find a way to ensure the up-front funding is available to build infrastructure, with the receipts from developer contributions to follow. The establishment of a State Fund and associated provisions around the use and allocation of this fund, together with a model for developer contributions should be explored.

3. Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?

   There are numerous successful examples of infrastructure agreements being established through a traditional deed and associated land management agreement. The schemes in place at Two Wells and Roseworthy are good examples. Such are examples where:

   - Infrastructure investigations were comprehensive;
   - Trigger points for infrastructure provision were clearly established;
   - A funding mechanism was established;
   - A third-party managing authority was established;
   - Responsibilities for infrastructure provision were clearly identified;
   - A dispute resolution process was established with provision for an independent expert to make determination.

1.3 New 30-Year Plan for Adelaide (Regional Plans)

The UDIA strongly believes that the new 30-Year Plan for Greater Adelaide must be developed by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity.

Regional Plans and any Sub-regions should be premised on multiple scenarios and build in appropriate growth opportunities in locations which are sought by the market. They must address the over reliance in housing supply of single dwelling subdivisions and instead proactively and urgently increase land supply in market responsive locations including greenfield and large-scale brownfield areas.

It is the UDIA's position that strategic infill is preferred over general infill as this provides optimum opportunity to master plan the regeneration of areas, resulting in better infrastructure co-ordination and development outcomes. Such can assist in optimising the urban tree canopy, on-street car parking provision and the like.

A new 30-Year Plan could recognise more large-scale strategic infill projects and work to unlock medium to higher density projects in appropriate areas. Better planned and more sustainable developments can include open space and provide for suitable infrastructure upgrades. Similarly, there should be a more strategic commitment to revitalising the City of Adelaide with more residents.

The 30-Year Plan and PDI Act must address housing affordability. Our housing market is the third least affordable nationally — falling behind Brisbane and Perth. The two largest contributors to this problem from a state perspective is the failure to plan for growth and the hidden cost of land and housing.

The major reason for diminishing affordability is the hidden cost of land and housing imposed by taxation, regulatory charges and development delays which reduce feasibility and increase the purchase price. Historical underinvestment by State and local governments is funded by the next generation of homeowners who are already facing tougher home ownership conditions than their parents ever did. There must be a continuing requirement for a State Government review of the cost impact of all policy decisions on construction and development standards. The Government must create focus on housing affordability and ownership by considering appropriate amendments to the PDI Act and associated regulations.

There is opportunity for Regional Plans and Sub-regions to consider open space planning with consideration to the areas that are experiencing high degrees of infill but have inadequate public open space. The Planning and Development Fund expenditure should be reflective and commensurate to where the contributions are coming from, so that a fairer system is in place to spend the money where it is needed and in the suburbs from which it has been collected. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it should be made annually by post code.

The new Regional Plans should be dynamic and consider various growth scenarios so that they can adapt to market conditions and changing environments. Housing affordability must be a key priority.

Strategic Planning

1. What are the best mechanisms for ensuring good strategic alignment between regional plans and how the policies of the Code are applied spatially?

   Regional plans are by nature a high-level strategic document, whereas the zones applied through the Code are at a more refined level.

One step to ensure greater strategic alignment would be for sub-regional plans to be established which would provide a higher level of detail as compared to the Regional Plan.

Within identified growth areas, there is a potential need for Structure Plans and/or Concept Plans to be established in order to:

- identify key infrastructure obligations which are either planned or required;
- facilitate improved infrastructure planning by all stakeholders, including utility providers and Councils;
- provide greater understanding and confidence to all stakeholders in respect to infrastructure provision;
- reduce reservations associated with the rezoning of land to accommodate future growth.

Infrastructure co-ordination is also a key issue in respect to infill development. Stormwater infrastructure, typically the responsibility of Councils, is a frequent impediment to infill development as there has been an underinvestment in assets over many years.

A critical element for the success of our recommendation is the adequate resourcing and commitment to implement the relevant infrastructure.

2. What should the different roles and responsibilities of State and local government and the private sector be in undertaking strategic planning?

Under the Development Act, Councils were responsible for preparing Strategic Directions Reports which aimed to ensure that local Development Plans aligned with the Regional Plan.

This obligation did not carry through into the new system, in essence due to the introduction of the Code, where the State Planning Commission is responsible for its preparation and maintenance - s.65(2). This is coupled with the Commissions responsibility for the establishment of the various Planning Instruments as prescribed in Part 2, Division 2 of the PDI Act.

As a consequence of the above, legislatively Councils have no apparent obligation to undertake strategic planning. This presents an issue given Councils are the owner of key assets which support urban growth, including but not limited to roads, public open space and stormwater networks. This creates a disconnect between land use planning and infrastructure planning.

We note that the Act makes provision for Joint Planning Agreements to be entered into. A Joint Planning Board can also be established in conjunction with any such Agreement.

We see this as a potential tool to manage planning at a sub-regional level, for the key purpose of improving the integration between regional planning strategy, infrastructure provision and the spatial application of the Code.

We understand that Joint Planning Agreements and associated Joint Planning Boards are not mandatory. Consideration could be given to formalize such a process where sub-regions and associated joint planning agreements and boards are required to be established.

We see this as a model to enforce improved infrastructure planning and integration with land use planning.

A key to the success of such a model would be for all relevant infrastructure providers such as SA Water (water and sewer) and DIT (roads) to be a party of the Joint Planning Agreements.

In earlier responses we noted the benefit of appointing an Infrastructure Scheme Co-ordinator for the delivery of infrastructure schemes. Such a role could be expanded as an Infrastructure Co-ordinator with broader powers to interface with any Joint Planning Agreement/Joint Planning Board arrangements.

The above are all recommendations to assist with improved infrastructure planning.

The UDIA considers that the private sector needs to retain a key role in the procurement and delivery of infrastructure. The sector is often able to deliver infrastructure faster and cheaper than the relevant agencies.

There is much merit in allowing developers to deliver the key infrastructure on their land parcel. It is attractive to developers to be able to construct key infrastructure in advance of a later delivery date by the relevant authority. However, the developer should be appropriately reimbursed for taking on the associated procurement and finance risks.

Early concept designs for infrastructure are required to allow this to happen. But early concept designs should be undertaken early in any case to enable appropriate calculation of costs of infrastructure, securing of finance, scheduling for implementation and fair apportionment of development contributions.

Contestability of all infrastructure works should be a requirement, to encourage the private sector to deliver infrastructure on a competitive bid basis.

1.4 Development Assessment

As part of the Phase 3 Submissions to the Draft Code, the UDIA raised concerns that under the PDI Act, there are a total of 24 Referral Triggers and 22 of these allow Referral Agencies to have the power of 'Direction' (i.e., the Agency can direct a decision (refusal)). There are two (2) referral triggers under the new system where the Agency can only provide advice to the Relevant Authority who must have 'Regard' to this advice.

The UDIA supports the changes made under the PDI Act that comments of Referral Agencies must be contained to 'matters for which a referral was made' and the referral Agency will be accountable to defend an appeal against a decision directed by that Agency.

Whilst we support the Referral Authority limiting their comments to matters for which the referral was made and we support referral authorities being accountable to defend determinations that have been directed by that authority, we reiterate our concerned regarding the 'veto' power of Referral Authorities that have the power of 'Direction.'

The UDIA takes this opportunity to again express concern in relation to the power of 'Direction' afforded to referral Agencies effectively make an Agency a 'quasi' planning authority with the power to veto any determination of the Relevant Authority. Each Agency effectively act as a separate authority – effectively requiring multiple approvals from multiple authorities for the one development application. The power of 'Direction' also provides significant power to Agencies to 'leverage' their authority to achieve outcomes beyond the purview of the referral.

To challenge a referral Agency would also involve considerable time (6-12 months) and money ($50K-$100K) for an applicant to initiate an appeal through the Courts. In most cases, this time and cost imposition would be beyond the threshold of feasibility of most development projects which would limit

the real opportunity for an applicant to appeal and overturn a determination of a Referral Agency. Further, an applicant appealing to the

Environment Resource and Development (ERD) Court would be challenging the weight of evidence and authority of a State Agency, which is likely to also limit an applicant's appetite to seek a successful resolution through the courts.

The UDIA recommend an amendment such that referrals allow for a Regard comment as opposed to mandatory Direction. If the status quo remains, then the assessment process will become cumbersome and compromised. If the planning authority does not follow the comments made by the referral agency, then the application could be sent to SCAP for concurrence, similar to the previous *Development Regulations 2008* requirements for State Heritage matters in Schedule 8 of the Development Regulations.

Ultimately it should be for the planning authority to balance the competing interests that arise between a developer, the community and government agencies.

Where a referral agency has a power of direction the exercise of the direction should occur as a 'one stop shop' avoiding the need for further approvals.

Where separate approvals are required under other legislation, an applicant should have the ability to defer those matters for later assessment.

Environment Protection Authority Referrals

The UDIA have made several detailed submissions in the past in relation to the State Planning Commission regarding site contamination policies, current wording of Practice Direction 14 and associated referral to the EPA.

The resolution of site contamination issues is rarely a question of 'if' and more often a question of 'how' (e.g. by what practical remediation solutions). Site contamination issues will rarely if ever go to the heart of whether planning consent should be granted, but has the propensity to delay that process dramatically. The urban development industry needs a nimble and cost-effect process for dealing with site contamination so as to turn land over quickly to meet the growing demand for housing in the State.

The UDIA believes that site contamination remediation can generate both public and private benefits by releasing previously contaminated land and facilitating urban regeneration which can result in significant economic, environmental and social benefits.

Site contamination is a complex and broad issue impacting large areas of land across the State, and the planning system is only one part of the Government's integrated approach to the management of site contamination However, as it stands, many people wanting to rejuvenate land are often subject to lengthy and onerous remediation processes.

We reiterate our previous concerns that the current site contamination policy suite 'front loads' the assessment of site contamination resulting in considerable cost and delay before planning consent is issued. Applicants will variously need to spend in the order of $5,000 on a "Preliminary Site Investigation (PSI)" report, $20,000-$200,000 on a "Detailed Site investigation" (DSI) and $20,000-$150,000 on an audit before knowing that they have a consent. The delay in undertaking a DSI (even without an audit) can be many months, sometimes a year. Assuming (again, without accepting that it should be part of the planning system) that an assessment is warranted, this level of integration should occur only once planning consent is in hand.

The UDIA seeks that Practice Direction 14's referral trigger (and potentially the regulations) put this requirement as a planning condition at the 'back end' once planning consent has been granted.

This could for example be achieved through the Reserved Matter power under section 102(4) of the PDI Act.

Native Vegetation

The UDIA agrees with the Expert Panel that the introduction of the 'Native Vegetation Overlay' and the 'State Significant Native Vegetation Overlay' has strengthened the retention of native vegetation on development sites.

However, there is a disconnect when lodging a Development Application on a site that is located within the Native Vegetation Overlay, as the Development Application Processing System (DAP) requires you to select from the following three options:

Native Vegetation Declaration

I declare that: *

- ○ The proposed development will not or would not, involve the clearance of Native Vegetation under the Native Vegetation Act 1991, including any clearance that may occur in connection with a relevant access point and/or driveway, and/or within 10m of a building (other than a residential building or tourist accommodation), and/or within 20m of a dwelling or addition to an existing dwelling for fire prevention and control, and/or within 50m of residential or tourist accommodation in connection with a requirement under a relevant overlay to establish an asset protection zone in a bushfire prone area.
- ○ The application is supported by a report prepared in accordance with Regulation 18(2)(a) of the Native Vegetation Regulations 2017 that establishes clearance is categorised as 'low level clearance' (for more information, please use the link below*). Please upload the report in relation to native vegetation on the next page.
- ○ No report or declaration supplied with this application.

*Regulation 18(2)(a) of the Native Vegetation Regulations 2017

It is recommended that the DAP system be modified to enable a fourth option that allows you to nominate that:

> "*A report has been prepared and identifies that moderate/major clearance of native vegetation is proposed, but is supported.* "

The 'fact sheet' for Native Vegetation on the PlanSA Website also does not provide a definition for 'low level clearance' which would therefore require an expert's opinion. It is recommended that a clear definition for 'low level clearance' be provided to support the streamlined processing of applications and a clear guidance to applicants. As it currently stands, most applicants do not possess the necessary expertise to confidently or accurately make the above declarations and applicants are therefore required to engage expert vegetation consultants to assist them in this process at considerable expense. Providing further guidance and clarity to applicants as part of detailed fact sheets may assist in reducing time and cost delays associated with the need to engage native vegetation consultants.

The UDIA would support investment in technology that enables identification of the location of native vegetation without the requirement to obtain expert consultant advice to lodge a development application. This information should be readily publicly available (i.e. via a layer on SAPPA).

In instances where applications trigger referral under the relevant Overlays, there is also still a requirement for the applicant to undergo a separate assessment and approval process under the 'Native Vegetation Act.' Applications that trigger referral should result in a combined planning consent and native vegetation approval to reduce 'red tape' and expedite the overall combined approval processes.

Code Amendments

When the PDI Act was introduced the UDIA supported placing the emphasis on consulting on changes to the planning rules upfront and then (once adopted) allowing landowners to exercise their private property rights in accordance with the rules. Since the implementation of Phase 3 of the Code, UDIA Members have advised the Proponent Initiate Code Amendment system has unlocked underutilized land

to be rezoned generally to address critical housing supply shortages and demand for changing land uses in a particular area.

The UDIA continue to advocate that emphasis should be placed on consultation occurring at the Code Amendment stage to enable a streamlined development assessment process for land uses that are expressly envisaged within the (once adopted) zone, without time delays and costs that may be occurred via third party appeal rights to challenge decisions made against that policy once it has been set and determined. The UDIA supports the State Planning Commission ('the Commission') guiding principles of the Engagement Charter being namely that if an application meets all the prescriptive rules and the land use is envisaged, that the application should receive a streamlined and assured approval without notification and third-party intervention.

Affordable Housing overlays

In the UDIA's submission for the Miscellaneous Technical Enhancement Code Amendment (MTECA) we raised concerns in relation to draft wording from the South Australian Housing Authority (SAHA) in the Affordable Housing Overlay referral trigger as drafted below. Our concerns were that this wording would result in all applications proposing 20 or more dwellings or residential allotments being referred to the Minister.

Current drafting in MTE Code Amendment:

> *"Except where the applicant for the development is the South Australian Housing Authority (or an agent acting on behalf of the South Australian Housing Authority), residential development or land division other than land division that reflects the site boundaries illustrated and approved in an operative or existing development authorisation for residential development under the Development Act 1993 or Planning, Development and Infrastructure Act 2016):*
>
> *a) that comprises 20 or more dwellings or residential allotments and the development is intending to provide affordable housing; or*
>
> *b) where the applicant is seeking to access one or more of the planning concessions outlined in the Affordable Housing Overlay DTS 3.1, 3.2 or 4.1; or*
>
> *c) that is described in the application documentation as including affordable housing of any number of dwellings or residential allotments."*

We reiterate the UDIA's strong support for the MTECA wording as drafted for consultation that the proponent must demonstrate an intent to provide affordable housing or be seeking to access one of more of the planning concessions to trigger a referral to the Minister. However, we would like to take this opportunity to again express our concern that the adopted wording remains vague and subject to interpretation especially the phrase 'seeking to access' which may be construed by a Relevant Authority as an automatic trigger for referral of the application (to the Minister responsible for administering the *South Australian Housing Trust Act 1995*). We again seek that the wording in the Affordable Housing Overlay referral trigger be amended to the following:

Suggested wording:

> *"Except where the applicant for the development is the South Australian Housing Authority (or an agent acting on behalf of the South Australian Housing Authority), residential development or land division (other than land division that reflects the site boundaries illustrated and approved in an operative or existing development authorisations for residential development under the Development Act 1993 or Planning, Development and Infrastructure Act 2016):*

a) that comprises 20 or more dwellings or residential allotments and is described in the application documentation as intending to provide affordable housing; or

b) that is described in the application documentation as intending to provide affordable housing and the applicant is seeking to access one or more of the planning concessions outlined in the Affordable Housing Overlay DTS 3.1, 3.2 or 4.1; or

c) *that is described in the application documentation as intending to including affordable housing for any number of dwellings or residential allotments*."

Public Notifications and Appeals

1. What type of applications are currently not notified that you think should be notified?

Generally, UDIA members consider the triggers for notification to be very robust. However, in some circumstances, applications are notified even where the type of development proposed is expressly envisaged in a zone. A wider review to identify these discrepancies is encouraged, and preferably a switch back to the listing only the types of development that should be notified rather than the current model which only lists forms of development that do not need to be notified (we expand on this point further below).

2. What type of applications are currently notified that you think should not be notified?

As part of the UDIA SA's submissions to Phase 2 and Phase 3 of the Code, we outlined that where a land use is envisaged and reasonable in its design and aligned with the performance outcomes of the Zone, an application should not be subject to public notification.

A example of this is where a land use 'element' is listed in a Zone's DPF 1.1 (i.e. it is an envisaged land use), it is not always listed as being 'excluded' from public notification in Table 5 of the Zone (even though it is listed as being an envisaged land use). Public notification should not be required for land uses identified in DPF1.1 of a Zone.

The UDIA SA raised concern during the Phase 2 and Phase 3 consultation periods that the approach of 'specifying types of development being excluded from public notification" would most likely result in more types of applications going on public notification, even if there are lengthy lists of development that are excluded.

UDIA Members experience has proven this to be the case, where departures to garage/dwelling wall lengths on boundaries have triggered public notification even if the element of non-conformance is minimal. This has sometimes led to protracted assessment timeframes where notification has resulted in public submissions who wish to be heard at the relevant Council Assessment Panel meeting.

Another example relates to 'Neighbourhood Type Zones' where a community facility, educational establishment or preschool which exceeds 1 building level requires public notice, even where the zone expressly anticipate dwellings of two building levels (which are excluded from public notice).

It is recommended that the structure of the notification triggers be flipped so that all forms of development are 'excluded' from notification other than specifically identified type of development which are then listed in the Procedural Matters (PM)- Notification table within each Zone. Only those specifically identified types of development would then be required to undergo notification

within the Zone, such as where development exceeds the specified building height or is clearly an unsuitable land use within in a zone.

3. What, if any, difficulties have you experienced as a consequence of the notification requirements in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.

UDIA Members have expressed concern in deciphering 'Column B' (exceptions) of Table 5 – Procedural Matters – Notification. In order to determine if a land use outlined in 'Column A' as being 'excluded' from notification is actually not excluded from notification (note the double negative i.e. the land use actually is required to be notified) members are required to either open two versions of the Code on their screens or to scroll back and forth between the DTS/DPF provisions and Table 5. For example:

Class of Development (Column A)	Exceptions (Column B)
Any development involving any of the following (or any combination of any of the following): (f) dwelling	Except development that: 1. Exceeds the maximum building height specified in…..DTS/DPF 2.1
Alternation of or addition to any of the following (or of any combination of any of the following): (a) community facility (b) educational establishment (c) pre-school	Except for development that does not satisfy… DTS.DPF 1.6

User experience has raised concern with the time and complexity involved in order to determine if an application will require public notice. This could be rectified by a formatting change where the DTS/DPF referenced is listed in Column B.

4. What, if any, difficulties have you experienced as a consequence of the pathways for appeal in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.

The UDIA supported the previous Expert Panel on Planning Reform's December 2014 'The Planning System We Want' recommendation that there is a focus shift to setting clear directions and policies up front and encourage communities to be involved when their participation is most meaningful during the Code Amendment (rezoning process). In members experience, the community consultation undertaken as part of the Code Amendment process provides meaningful engagement on zoning and policy framework to adjoining property owners/occupants.

The current level of appeals being limited only to applicants rather than third parties assists in streamlining the application and avoids vexatious litigants.

5. Is an alternative planning review mechanism required? If so, what might that mechanism be (i.e. merit or process driven) and what principles should be considered in establishing that process (i.e. cost)?

The current planning review mechanisms enables an aggrieved applicant to either have a review of an Assessment Manager's Decision to the relevant Assessment Panel (Council, Regional or Commission) or directly to the ERD Court. Under the PDI Act, the relevant Assessment Panels are (with the exception of one (1) elected member) comprised of Accredited Professions to a Level 2 standard. This ensures a review by a Panel (i.e. CAP) is being undertaken by a panel who have the expertise and experience to hear and considers such matters. In addition, the existing ERD Court system has suitably qualified and experienced Commissioners. The UDIA support the existing review and appeal avenues without further need for yet another administrative review 'tribunal.'

The UDIA would however support a more streamlined ERD Court process, particularly in relation to the timeframe taken for planning appeals to be determined. It is not uncommon for planning appeals to take over a year to be determined, with the parties waiting up to 8 months to receive judgment following a hearing. This delay, in combination with the expense of the process has meant that the ERD Court is not readily available as an avenue to resolve an impasse with a relevant authority, for applicants and residents alike.

Despite having three full time Commissioners and a number of allocated Judges the ERD Court has, as at 13 December, published just 17 judgments in 2022. Of these only a handful are 'planning appeals'. It is apparent that a large amount of time is being spent on a relatively small number of matters.

There are clear opportunities to reform the ERD Court processes to make it a more accessible and efficient part of the overall system. These could include empowering the Court to take a more active role in refining the issues in dispute (avoiding every element of a development being considered) or legislating a timeframe for delivery of judgments.

Accredited Professionals

1. Is there an expectation that only planning certifiers assess applications for planning consent and only building certifiers assess applications for building consent?
2. What would be the advantages of only planning certifiers issuing planning consent? What would be the disadvantages?
3. Would there be any adverse effects to Building Accredited Professionals if they were no longer permitted to assess applications for planning consent?

UDIA members have expressed there is some time benefits to enabling Building Accredited Professions to assess some applications for planning consents (akin to the former 'Residential Code' scheme under the rescinded *Development Act 1993*). Time efficiencies can be gained by the Building Certifier being able to issue a combined Planning Consent and Building Consent thereby fast-tracking approvals for developments that 'tick the box.' As such the UDIA supports the current accredited professional framework that enables building certifies to assess certain classes of development for planning consent (such as Deemed-to Satisfy) forms of development.

Impact Assessed Development

1. What are the implications of the determination of an Impact Assessed (Declared) Development being subject to a whole-of- Government process?

   Ensuring and maintaining transparency and accountability in public decision making is strongly supported by the UDIA. Whilst streamlining assessment processes is fundamental to ensuring the timely delivery of critical housing products, for more significant 'major projects' our members recognised the importance of ensuring all Ministers that may be impacted by a project (i.e. infrastructure, economic development, environment etc) are able to review and comment on a proposal to ensure the best outcome for all South Australians. The UDIA recognize and support the Expert's Panel suggesting of re-introducing a Cabinet Review Process for 'Impact Assessed (Declared)' forms of development as recommended by the Select Committee of Parliament's inquiry into the Kangaroo Island Port application as an appropriate mechanism to ensure the appropriate level of scrutiny for State significant forms of development. This should be appropriately balanced however to ensure that developments are expedited and not needlessly complicated or delayed.

Deemed Consents

2. Do you feel the deemed consent provisions under the PDI Act are effective?

3. Are you supportive of any of the proposed alternative options to deemed consent provided in this Discussion Paper? If not, why not? If yes, which alternative (s) do you consider would be most effective?

   The UDIA in its 'Grow, Reform Build' blueprint identifies creating 'an efficient planning and approval mechanisms to minimise 'red tape' as being essential to the urban development sector. Accordingly, the UDIA support the Expert Panel's suggestion of a 'Deemed Approval' in instances where an applicant has received both planning and building consents for an application, but the relevant authority (Council) has either delayed or refused to issue the final development approval.

   Members would also strongly support the Expert Panel's suggestion of enabling (by way of a Regulation amendment) an accredited professional to issue the final development approval. This would avoid 'double handling' by relevant authorities (i.e. Council) and delays associated with the administrative issue of another Decision Notification Form onto the PlanSA system. Given the accredited professions (building) needs to ensure consistency between planning and building consents, it logically follows that once both planning and building consents have been granted Development Approval could then also be granted by the accredited professional.

   Members have identified that whilst the current 'Deemed Consent' mechanism is supported, it is mainly used as a 'last resort' to obtain a decision from the relevant authority who has exceeded their statutory timeframes. There is a perception of 'maintaining working relationships' with officers at the relevant authority (i.e. Council) and this may lead to a reluctance within the sector to issue Deemed Consent notices. Concern is also raised that the current 'deemed consent' function does not 'commence' until a development application has been 'verified' under Regulation 53(2) by the relevant authority. It is recommended that a review of the verification timeframes together with Deemed consents process is undertaken to ensure the combined verification and assessment process is undertaken as expediently as possible.

   Relevant authorities retain the ability to appeal against a Deemed Consent notice and there are no consequences for a relevant authority where this occurs. The UDIA considers that where a relevant authority appeals against a Deemed Consent notice and is unsuccessful in overturning the Deemed Consent it should be required to pay the costs of the applicant who has suffered unnecessary delay through the actions of a relevant authority.

Verification of development applications

1. What are the primary reasons for the delay in verification of an application?

As outlined in the UDIA SA's submission to Phase 3 of the Planning and Design Code, currently the Verification Process (5 business days) that occurs at the beginning of every development application has no express consequence attached should the planning authority not undertake this verification process within the 5 day timeframe. During the Phase 3 P&D Code Consultation UDIA SA raised concern that the planning authorities may take longer to verify applications and where verification is delayed, the lodgment and assessment process will not have officially commenced, meaning it is not possible for the applicant to instigate the Deemed to Consent process. This effectively leaves applications 'in limbo'.

This concern has unfortunately become a reality since the implementation of the Code with a large percentage of relevant authorities failing to verify applications with in the 5 business day period. Experience from UDIA members concur with the anecdotal evidence sited by the Expert Panel that a lack appropriate resourcing by relevant authorities leads to delays in the verification process, with no consequence for the relevant authority and no means for an applicant to rectify the delay.

The UDIA is aware that there is currently no University within South Australia that provides an Undergraduate Planning degree. The only pathway into the profession within South Australia is via the Master of Urban and Regional Planning at the University of South Australia, which was postponed in the previous two years due to the Covid-19 pandemic and only recommenced at the start of 2022. The lack of new qualified town planners entering the profession, combined with those leaving the profession (either via retirement or moving to alternative career pathways) has resulted in a critical shortage of qualified planning staff to administer the system.

The UDIA SA would strongly encourage the State Government to work with the Universities to provide greater career pathways options into the planning profession in order to accommodate the staffing requirements of relevant authorities to expedite the assessment system. Funds collected by the CITB could potentially be used to improve the quality and accessibility of training provided to the planning profession.

UDIA SA members have also cited unrealistic and unjustified request for information and documentation outside the information required under Schedule 8 of the PDI (General) Regulations from relevant authorities during the 'verification' period. There is a view (rightly or wrongly) that these requests during verification are a 'workload management' tactic, used to delay lodgment and 'stop the clock' on the process to give the relevant authority more time. Alternatively some relevant authorities are requesting an extensive list of possible items anticipated by Schedule 8 without reference given the limited scope expressed by Regulation 31.

Such examples of unjustified requests for documentation during verification include:

- Request for software details of a carpark free space 'loop' calculator which was essentially a 'box' that was located with a landscaped area which otherwise would not constitute 'development' if not associated with the signage;
- Details of anticipated waste volumes for a childcare centre;
- Details of estimated time it will take a waste vehicle to collected bins from a childcare centre and the footpath waste contractors would utilise to wheel bins from enclosure to the collection vehicle;

- Details of the mature height of landscape plan species to be shown on the landscape schedule;
- Requests for added notations on elevations regarding the height of obscure glazing to manage privacy concerns;
- Requesting a DRAINS model and MUSIC model in addition to the provided stormwater management plan; and
- Clarifications of traffic generation rate used in expert consultant's traffic assessment report.

Given the above examples, the UDIA would strongly support the Expert Panel's suggestion of amending the Schedule 8 – Plans and documentation requirements required for verification.

UDIA Members have also raised verification delays in instances where there is debate as to whether Council or SCAP is the relevant authority (i.e. a new application to very an application previously issued by SCAP). In such instances when an application is submitted, the DAP system only enables the selection of the relevant Council as the 'relevant' authority. Council then has to manually re-assigned the application to SCAP as part of the verification process. This would be overcome if the DAP system allowed 'SCAP' to be directly selected as a relevant authority.

2. Should there be consequences on a relevant authority if it fails to verify an application within the prescribed timeframe?

It is considered that if planning authorities do not meet the Verification timeframe, then the Assessment Process timeframe must commence, and the fees are not payable. It is understood that this would require an amendment to the Regulations. The wording in Regulation 53 (2) regarding payment of fees will need to be taken into consideration. At present there appears to be a gap in the overall process between Regulations 31 and 53 which needs addressing.

Other options that could be considered include self-verification or ERD Court costs penalties where it is necessary for the Court to determine or direct the verification decision.

3. Is there a particular type or class of application that seems to always take longer than the prescribed timeframe to verify?
4. What would or could assist in ensuring that verification occurs within the prescribed timeframe?
5. Would there be advantages in amending the scope of Schedule 8 of the PDI Regulations?

Reserved Matters

In the UDIA's submission for the Miscellaneous Technical Enhancement Code Amendment (MTECA) we highlighted recommended improvements in relation to Section 102(3)-(5) of the PDI Act which enshrines the power for some matters relating to the assessment of a proposed development to be reserved for later assessment:

"(3) A relevant authority may, in relation to granting a planning consent, on its own initiative or on application, reserve its decision on a specified matter or reserve its decision to grant a planning consent—

(a) until further assessment of the relevant development under this Act; or

(b) until further assessment or consideration of the proposed development under another Act; or

(c) until a licence, permission, consent, approval, authorisation, certificate or other authority is granted, or not granted (by the decision of another authority), under another Act.

(4) A relevant authority must allow any matter specified by the Planning and Design Code for the purposes of this subsection to be reserved on the application of the applicant.

(5) Any matter that is not fundamental to the nature of the relevant development may, subject to the Planning and Design Code, be reserved under subsection (3) or (4)."

We take this opportunity to reiterate that the ability for an applicant to nominate certain matters which are not fundamental to the question of whether Planning Consent can be granted is potentially of great utility. It does not avoid assessment of those matters but rather enables an applicant to obtain a decision on whether Planning Consent is warranted without incurring unnecessary costs on matters which are not fundamental to that decision.

The applicant, not the Relevant Authority, bears the risk that the reserved matters cannot ultimately be achieved for some reason. The planning system contemplates that the Code will specify certain matters which an applicant may request to be reserved for later assessment.

We confirm the matters which in our opinion would be suitable to be included in the Code for the purposes of section 102(4) of the PDI Act include:

• Site Contamination;

• Stormwater;

• Wastewater disposal;

• Landscaping;

• Native Vegetation clearance; and

• Final materials and finishes.

Obviously there will be times when an applicant wishes to include matters like landscaping and final finishes in the initial application in order to demonstrate the merits of a development. There will be other times when those matters have little bearing on the decision to grant or refuse Planning Consent.

On this basis, we again recommend that an amendment to Table 2 of Part 5 of the Code to specify that the above matters are matters that an applicant may request to be reserved for later assessment.

We also take this opportunity to highlight that the current DAP system does not currently have the functionality to enable applicants to upload information to address reserved matters and/or conditions of consent. It is recommended that the DAP enhancement be included to enable a more streamlined and trackable post-approval functionality.

OTHER

Response to requests for Further Information

- When an applicant responding to a Request for Information (RFI) from the relevant authority on the DAP system, the application remains 'on hold' until such a time that the relevant authority

confirms whether or not the applicant has sufficiently resolved the RFI content. UDIA Members understand that this is a 'loophole' that some Councils use because there are no assessment timers to manage this process. Often it appears to be caused by Council's planners awaiting to hear back from their engineers or other internal departments. This can result in an applicant's response to an RFI being uploaded but not being 'confirmed' by the relevant authority for several weeks (during which the assessment clock has stopped), adding to delays in assessment that are not picked up by the DAP system clocks. The UDIA recommended that the DAP system be modified so that the relevant have five (5) business days to confirm whether the applicant has sufficiently addressed the RFI once a response has been submitted before the application returns to be 'live.'

Shared Access to Applications on DAP system

- The UDIA support the use of technology to enhance the accessibility of the planning system for all members of the urban development industry. Members have identified the current DAP system provides access to one entity who then must share access with others (i.e. project team) who often will need to access requests for further information, stamped approved plans, decision notices etc. A recommended future enhancement of the DAP System should enable greater flexibility for project team members to access application information without the reliance of the submitter to 'share' the application with them.

2. Urban Infill Policy

The UDIA recognises the benefits of a consistent set of planning policies established through the Planning and Design Code for the development sector.

As stated in the Panel's report, South Australia's infill policy is new, and the outcomes are yet to be fully realised. We recognise that infill development has been a key policy area of reform given the significant community interest in this issue.

Master planned developments must be treated differently from general infill given the opportunities to coordinate and plan in a way that delivers liveability, sustainability and to provide for the range of housing our community needs.

While the overall planning outcomes may be consistent for infill and greenfield development, the tools available to achieve master planned developments are much broader as they are not constrained by compatibility with existing character, road networks, open space provision or an existing public realm.

The UDIA strongly supports the continued supply of master planned neighbourhood-type zones which provide the necessary flexibility for developments to evolve and respond to the housing market. We do not support however, the inclusion of infill-type policies in these master planned areas.

Design Guidelines

1. Do you think the existing design guidelines for infill development are sufficient? Why or why not?

   The UDIA recognises that infill development policies need to carefully balance the existing neighbourhood characteristics and constraints with the community's desire for a range of housing. Significant design policies have been included in the Planning and Design Code to address this

balance. Given that dwellings considered under the HomeBuilder Scheme were not assessed against these new policies, insufficient time has passed to test their effectiveness. The UDIA therefore recommends further monitoring of the impacts on development potential, availability of housing stock and design outcomes before making further changes.

In relation to design manuals to support the Code, the UDIA is concerned that this adds another layer of complexity to the planning system overall and provides uncertainty around the role of these documents. Guidelines and design manuals should be seen as advisory rather than policy. Where it is policy, it should be within the Code.

2. Do you think there would be benefit in exploring alternative forms of infill development? If not, why not? If yes, what types of infill development do you think would be suitable in South Australia?

The UDIA supports the Code facilitating a range of infill development types that meets the housing needs of South Australians. It is for this reason that it is important that a performance-based approach to planning is maintained within the legislation and the Code.

The policies must enable innovative and creative housing solutions and not continue to fall back on a tick box approach to planning in a way that stops good projects from happening. We advocate for clear and certain policies with streamlined assessment pathways where codification is possible. However, there must always be the option of a performance based assessment to support unique circumstances and innovative opportunities.

In strategic infill sites, it is critical that there is a high level of flexibility to ensure we can make the most of these sites and provide for housing diversity.

In particular, we would like to see the quantitative standards of the Code reviewed for larger strategic infill sites where there is a higher propensity to resolve all of the design concerns expressed in respect of small-scale infill. This is the opportunity for new and innovative housing led by the development sector. A method of achieving this might be through consideration of dispensation for significant development sites.

Car Parking Policy
Code Policy

1. What are the specific car parking challenges that you are experiencing in your locality? Is this street specific and if so, can you please advise what street and suburb.

For residential development within master planned developments, car parking can be balanced between on-site and off-site provision. The rigid application of residential car parking rates in these areas can stifle innovation, make it difficult to create small-lot housing products and impact on housing affordability.

A more flexible assessment approach to car parking for Greenfields or strategic infill is recommended to enable a greater diversity of housing stock where there is greater opportunity to consider a range of parking solutions.

2. Should car parking rates be spatially applied based on proximity to the CBD, employment centres and/or public transport corridors? If not, why not? If yes, how do you think this could be effectively applied?

   There are some key areas where there are a unique range of factors guiding car parking numbers and it is reasonable to have differing car parking rates, for example:

   - Master planned development should have more flexible rates than small-scale infill
   - Parking is not required in the CBD where public transport is accessible
   - Strategic employment areas could be more flexible where there is shared parking.

   These could be specifically identified through a Car Parking Overlay within the Code. The current approach is to exclude areas through Transport, Access and Parking Table 2 from the general standards. However, this is more difficult to find and interpret when navigating the Code.

3. Should the Code offer greater car parking rate dispensation based on proximity to public transport or employment centres? If not, why not? If yes, what level of dispensation do you think is appropriate?

   Car parking numbers within the Code are generalised figures based on high level analysis to broadly address car parking concerns. A performance-based planning system is designed to enable alternatives to the numerical assessment standard where a lesser amount is proposed.

   There are many circumstances where a reduced car parking rate can be justified. For example where there is available shared parking, on-street parking, access to public transport, high level of walkability or the other strategic outcomes are prioritized.

4. What are the implications of reviewing carparking rates against contemporary data (2021 Census and ABS data), with a focus on only meeting average expected demand rather than peak demand?

5. Is it still necessary for the Code to seek the provision of at least one (1) covered carpark when two (2) on-site car parks are required?

   We note that the draft Code for consultation required that only one (1) car park needed to be provided for two-bedroom homes.

   Car ownership data (using the vehicle registration system and information from the Australian Bureau of Statistics) demonstrated that this would be sufficient, as 2016 statistics indicated that the highest proportion of households owned one (1) or no cars (42 per cent) and approximately 35 per cent of the population owned two (2) cars.

   However, in response to feedback from the public and councils during consultation on Phase Three of the Code, the car parking rates were increased to provide at least two (2) car parks for two-bedroom infill housing, increased from one (1) car park originally proposed. The Code also required at least one (1) of those car parks to be covered (e.g., carport or garage).

   The UDIA considers that greater flexibility should be applied to small lot housing in master planned communities and would welcome the opportunity to work with the Commission on how a more flexible policy position could be developed.

The requirement for undercover car parking to be provided should be reviewed having regard to the propensity for garages to be used as storage spaces instead of car parks.

Design Guidelines

1. What are the implications of developing a design guideline or fact sheet related to off-street car parking?

   Provided that the role of the fact sheet or design guideline is clear as advisory, it may be useful to provide clarity around car parking layout and design. However, it is not an issue raised by our membership as a significant priority.

Electric Vehicles

1. EV charging stations are not specifically identified as a form of development in the PDI Act. Should this change, or should the installation of EV charging stations remain unregulated, thereby allowing installation in any location?

   There is a need for flexibility in the planning system as the EV industry is emerging and it is expected the EV market will adapt to technology as the industry grows.

   EV prevalence as well as the use of solar power and batteries will ultimately change sustainability requirements of development and alter people's movement and choices (at home and at work).

   While EV charging stations are currently not identified as a form of development in the PDI Act, the effect of making EV charging stations development may make it more difficult to deliver them.

   If EV charging stations are substantial, they do have the potential to become a change of use within the current system. If this occurs, they will be assessed against the general provisions of the Planning and Design Code.

   Currently there are a number of private providers of EV charging stations such as 'Jolt' that provide free charging but incorporate an advertising display into the charging station (i.e. the advertising associated pays for the free charging to users). In examples provided by UDIA members, if these structures are located within the Neighbourhood-Type Suite of Zones public notification is triggered due to the advertising component. Conversely if EV charging infrastructure in other zones is not expressly excluded by Table 5 and therefore the infrastructure itself triggers public notice.

   The UDIA encourages the reduction in red tape including streamlined assessment process for this essential infrastructure. We would strongly support the introduction of Code policy to provide incentives and reductions in car parking where charging stations are provided as part of a development.

   The Government may also need to consider the long-term planning for increased demand for electricity infrastructure to support his shift.

2. If EV charging stations became a form a development, there are currently no dedicated policies within the Code that seek to guide the design of residential or commercial car parking arrangements in relation to EV charging infrastructure. Should dedicated policies be developed to guide the design of EV charging infrastructure?

There are a range of policies within the Code that exist and could be applied to this land use, including access and parking, interface between land use, design and appearance etc.

If EV charging stations became a form a development, there are currently no dedicated policies with the Code that seek to guide the design of residential or commercial car parking arrangements in relation to EV charging infrastructure. Should dedicated policies be developed to guide the design of EV charging infrastructure?

Car Parking Off-Set Schemes

1. What are the implications of car parking fund being used for projects other than centrally located car parking in Activity Centres (such as a retail precinct)?
2. What types of projects and/or initiatives would you support the car parking funds being used for, if not only for the establishment of centrally located car parking?

The UDIA supports the establishment of car parking funds where it offers an appropriate alternative to the provision of on-site parking. However, we do note that several councils, namely the City of Salisbury, City of Port Adelaide Enfield and City of Norwood, Payneham and St Peters set up car parking funds and then dissolved them.

Car parking off-set schemes should:

- Involve industry participation in their development
- Have fair and reasonable fees that do not erode the confidence of industry to invest in areas
- Ensure the funding to be captured is sufficient to deliver on the ground outcomes or will be 'topped up' by the local council or other body (i.e. the scale needs to be right).
- Be designed to minimise administrative overheads
- Provide certainty, accountability and transparency.

As with any off-set scheme or payments from the development industry it is crucial that the intended purpose is clear, the cost is a reasonable impost on development, there is a suitable number of developments that ensure the funding provided is sufficient to deliver an outcome and there is a clear connection to the Code.

The UDIA does not consider that car parking off-set schemes should be applied to master planned developments or strategic infill sites.

The main application of car parking funds has been for activity centre precincts and mainstreets where development is being undertaken within constrained sites, where on-site car parking numbers are difficult to achieve. As set out above, these schemes can be effective but require careful management to ensure they deliver car parking on the ground.

Commission Prepared Design Standards

1. Do you think there would be benefit from the Commission preparing local road Design Standards?

There is significant frustration within the industry around the lack of clear standards for local roads, which typically vary from Council to Council. There would be significant time and cost savings for the development sector if a standard set of design requirements could be achieved. However, Councils

must accept Design Standards that are adopted by the Commission. The UDIA would welcome the opportunity to liaise and consult with the Commission, LGA and Council's to inform the development of suitable Design Standards.

The introduction of a broadly accepted standard will need to provide scope flexibility to ensure innovation is not stifled.

Native Vegetation

1. What are the issues being experienced in the interface between the removal of regulated trees and native vegetation?
2. Are there any other issues connecting native vegetation and planning policy?

The introduction of the Native Vegetation Overlay and the State Significant Native Vegetation Overlay have strengthened the nexus between the planning assessment process and Native Vegetation Act. However, there is still a separate assessment and approvals process under the Native Vegetation Act. An amendment to the Native Vegetation Regulations could exempt the need for approval under the NV Act where an application was referred to the Native Vegetation Council under the PDI Act. This is similar to the EPA licensing process.

There is often significant confusion in areas where both regulated tree and native vegetation controls apply.

For enhanced clarity, the system could also be designed to state that one scheme takes precedence over the other so that approval processes are not unnecessarily complicated and duplicated.

Tree Canopy

3. What are the implications of master planned/greenfield development areas also being required to ensure at least one (1) tree is planted per new dwelling, in addition to the existing provision of public reserves/parks?
4. If this policy was introduced, what are your thoughts relating to the potential requirement to plant a tree to the rear of a dwelling site as an option?

The UDIA understands the importance of urban tree canopy to our long-term sustainability and climate change resilience. We understand that the Urban Tree Canopy Overlay was introduced to address tree loss through urban infill. The policy was specifically designed for infill development where more granular policies are needed to address tree loss, provide for soft landscaping, and address the impact of additional hard surfaces on stormwater systems and urban heat load.

Master planned communities aim to not only have the same level of sustainability and tree canopy levels as Adelaide's more established suburbs but aspire to meet and exceed them. However, there are many ways this can be achieved.

Sustainability can be achieved through the integrated design of the public and private realm, with coordinated tree planting and integrated stormwater solutions based on Water Sensitive Urban Design Principles. These issues are largely addressed at the master plan/ land division level rather than at the individual dwelling application level.

The UDIA would support flexibility about the location of trees on infill development sites.

Tree Protections

The current legislative framework achieves a reasonable and appropriate balance between protection of large established trees and achievement of urban infill and development across Greater Adelaide. Any change to the current legislative and policy framework to remove or alter current exemptions (ie tree circumference of distance to a dwelling or swimming pool) should include robust assessment and analysis of the implications of change with respect to reduced dwelling yields, achievement of infill targets as well as impact on housing affordability.

5. What are the implications of reducing the minimum circumference for regulated and significant tree protections?

A jurisdictional comparison of tree protection measures should include a comprehensive review of greening strategies adopted by each Australian state.

The tightening of existing tree protection controls will have significant impacts on property values, further constraining development potential of land as well as impacting on landowner rights to remove trees on private land, including circumstances where there are genuine safety concerns.

6. What are the implications of introducing a height protection threshold, to assist in meeting canopy targets?

The current tree circumference test is appropriate on the basis that:

- it is simple to understand
- does not require technical expertise
- is cost effective and accurate, minimising legal disputes.

7. What are the implications of introducing a crown spread protection, to assist in meeting canopy targets?

8. What are the implications of introducing species- based tree protections?

The UDIA supports the intention to protect Significant and Regulated Trees in Adelaide. We also support the current simple framework to identify Significant and Regulated Trees, and the inclusion of exemptions that protect significant buildings from tree affects.

The UDIA does not support changes to Significant and Regulated Tree policy which will increase the complexity of the assessment process, have the potential to put buildings and assets at risk, or significantly impact on the development potential of land.

Distance from Development

9. Currently you can remove a protected tree (excluding *Agonis flexuosa* (Willow Myrtle) or Eucalyptus (any tree of the genus) if it is within ten (10) metres of a dwelling or swimming pool. What are the implications of reducing this distance?

10. What are the implications of revising the circumstances when it would be permissible to permit a protected tree to be removed (i.e. not only when it is within the proximity of a major structure, and/or poses a threat to safety and/or infrastructure)?

The removal or alteration of exemptions for the removal of trees in proximity to dwellings and pools have been introduced to manage the risk of damage to people's homes and assets. Before varying

these provisions, a clear rationale would need to be provided and a risk assessment undertaken to understand the impact of reduced exemptions, (ie materials, damage to property, insurance etc).

Urban Tree Canopy Off Set Scheme

11. What are the implications of increasing the fee for payment into the Off-set scheme?
12. If the fee was increased, what are your thoughts about aligning the fee with the actual cost to a council of delivering (and maintaining) a tree, noting that this would result in differing costs in different locations?

Despite fears that all developers would elect to pay into the Tree Canopy Off-set Scheme in lieu of planting trees, the UDIA notes the Expert Panel has identified that there have only been 10 applications requiring payment into the Scheme. This equates to 5% of all eligible applications.

There will always be examples where trees cannot be provided on-site, and an alternative solution needs to be available (particularly for constrained sites).

A standardised fee for the off-set is supported, however raising these fees must be balanced against housing affordability and the range of charges that add up for a development (e.g., open space contribution). Charging what it costs for councils to maintain a tree is not a fair or reasonable way to calculate the off-set and is likely to raise it significantly.

Greater transparency in the use of the off-set funds is important.

Setting a fee at the level to be maintained by Council's sets a high bar that will ultimately drive up development costs and therefore increase the cost of housing.

13. What are the implications of increasing the off-set fees for the removal or regulated or significant trees?

There are occasions when it is not possible or inappropriate to replace Regulated and Significant Trees on a site in urban areas. The off-set scheme is therefore an appropriate mechanism to off-set tree loss. Increasing the cost of tree removal for infill and master planned developments would however add a significant cost burden to development and should not be applied in cases where the trees can be replaced. Many developers regard trees as an asset and therefore only remove them when there is a negative impact on the urban outcome.

Public Realm Tree Planting

14. Should the criteria within the Planning and Development Fund application assessment process give greater weighting to the provision of increased tree canopy?

South Australia has the highest open space provision requirement in the country at 12.5 per cent of the area of a land division whereas other states range from 6 per cent to 10 per cent. Some inner-middle suburban councils have suggested a provision of 20–25 per cent open space in medium density developments, an amount which is clearly unsustainable from a land economics and a maintenance perspective.

In contrast, some fringe metropolitan councils actively encourage a lower requirement for open space, typically around 8 per cent, and collect a financial contribution to make up the outstanding balance.

The Planning and Development Fund should be reviewed as follows:

- Facilitate better urban amenity and accessibility by committing to reviewing and reforming the open space contributions to create a fairer and more flexible approach.
- Through amendment to the Regulations, or Act, incorporate all open space uses into the 12.5 per cent contribution and not seek additional land for other open space purposes (eg stormwater which is also adding to open space amenity).
- Restrict the ability to impose an unreasonable minimum open space size for parks and reserves by recognising within the Code that there are multiple uses and sizes of reserves which serve a variety of purposes.

In terms of the use of the fund for tree canopy, we recognise that planting trees in public spaces provides significant benefit to local communities and can contribute to public amenity, place making and remove urban heat load impacts in urban areas design.

The P&D Fund criteria needs to ensure public benefit is achieved and balances the role of this fund with the Tree Off-set Scheme funds.

Character and Heritage Policy

1. In relation to prong two (2) pertaining to character area statements, in the current system, what is and is not working, and are there gaps and/or deficiencies?
2. Noting the Panel's recommendations to the Minister on prongs one (1) and two (2) of the Commission's proposal, are there additional approaches available for enhancing character areas?

The Historic Areas Overlay and Character Areas Overlay have fundamentally different purposes:

- Historic Areas - planning provisions promote the retention of buildings that contribute to the heritage values of an area. Planning provisions ensure new development is complementary to established heritage values.
- Character Areas - the focus of planning provisions is not on restricting demolition, rather on the form and character of replacement/new development that is complementary to clearly established character objectives.

Historic (Conservation) Zones within Development Plans were largely transitioned into Historic Areas under the Code. However, many of these would not meet any heritage test if it was to be applied today.

A large portion of Greater Adelaide's Inner Metropolitan Area is within a Historic Area, placing substantial constraints on growth within inner metro suburbs (within 10km of the CBD).

Demolition controls are generally stronger for Historic Areas than Historic (Conservation) Zones under Development Plans (with a few outlier exceptions).

The elevation of Character Areas to Historic Areas will expand the application of demolition controls to new areas. This should only be on the basis that it is to protect 'heritage'. The impact of this change would be to reduce the capacity of new housing forms to be developed in key inner areas of Adelaide. This is now the case, where most of the City of Unley, along with suburbs of Medindie, Gilberton, St Peters, Rose Park and Toorak Gardens are within a Historic Area Overlay.

While there has been criticism from Councils about Historic Statements and Character Statements, they should be limited to identifying the most important and consistent elements of heritage or character value in the surrounding area. They are an expression of what exists.

When Statements are read with the relevant provision of the Overlays, they are effective in providing guidance for development assessment purposes. Statements should not be updated to include policy content, which should remain in the Overlay. The Statements should clearly identify the elements /characteristics of value.

There is room for ongoing improvements to these Statements, however it is important that the intent does not lead to lengthy commentary that undermines the streamlining of policy achieved through the reform program.

3. What are your views on introducing a development assessment pathway to only allow for demolition of a building in a Character Area (and Historic Area) once a replacement building has been approved?

4. What difficulties do you think this assessment pathway may pose? How could those difficulties be overcome?

This proposal aims to introduce a new development assessment pathway that only allows for the demolition of buildings within a Character Area or Historic Area Overlay once a replacement building has been approved.

The Code appropriately removed the replacement building test from the planning rules.

The assessment for demolition should be on the basis that the building is of heritage value. A Local Heritage Place Overlay or State Heritage Place Overlay already exist for those properties identified as having characteristics of value, which have generally been informed by in depth heritage surveys. The Local Heritage Place Overlay and State Heritage Place Overlays already have suitable 'demolition' tests associated with them. The UDIA agree with this approach that Demolition policies should support the protection of places that display historical attributes worthy of preservation. Those dwelling that are not considered to be of value should not be unduly restricted from being demolished until a replacement dwelling has been approved.

Further, the design of a replacement building should be unrelated to the heritage value of an existing building and assessed against the design requirements within the relevant overlay.

This doesn't mean that the design of new buildings is not important. Any application for new development must satisfy several clear tests in the Code. These tests include:

- consistency/compatibility with nearby heritage buildings in terms of streetscapes
- front /side boundary setbacks, and
- architectural detailing (wall height, roof pitch/form, window and door openings, chimneys, verandas and materials).

The role of the Character Area Overlay is to ensure development complements the established character of the locality, rather than to control the removal of buildings that do not have heritage value.

Local Heritage in the PDI Act

1. What would be the implications of having the heritage process managed by heritage experts through the Heritage Places Act (rather than planners under the PDI Act)?

   The UDIA supports heritage expertise underpinning heritage decision-making. However, heritage must still be balanced with the overall development potential of areas.

   Control at the State Government level achieves consistency in the approach to heritage listing processes and we support Government maintaining an oversight role.

2. What would be the implications of sections 67(4) and 67(5) of the PDI Act being commenced?
   In relation to the introduction of section 67(4) and 67(5) of the PDI Act. This provision essentially puts the definition of character areas in the Code to a community vote. While the sentiment and intention are positive, this is a poor precedence for other policy decisions, and overall is not considered to be good practice.

3. Planning System Delivery and Operation

Website Re-Design

1. Is the PlanSA website easy to use?

   The UDIA SA support the refresh of the PlanSA website to enable the easy accessibility of information to all South Australians. Whilst the current website provides a wealth of information, it is not considered to be simple to use or intrinsic to navigate to find information you are seeking (even for the seasoned professional!).

   UDIA support the Panel's recommendation to enable a 'subscription service' to enable the community to subscribe and receive notification to certain types of development and changes to the status of applications. This will improve system usability for all South Australians without the need to continually monitor the website.

   UDIA also support the Panel's recommendation of providing an interactive development application tracking map that would like back to the public register and notification page. This will assist in making data easily accessible to all South Australians and be able to clearly see the location of applications which may affect them.

2. What improvements to the PlanSA design would you make to enhance its usability?

Mobile Application for Submission of Building Notifications and Inspections

1. Would submitting building notifications and inspections via a mobile device make these processes more efficient?

   The UDIA support the previous Expert Panel on Planning Reform's December 2014 recommendations outlined in 'The Planning System We Want' that sought to "*capitalize on emerging technologies should improve access and reduce delays and duplication*." The suggestion to submit building notifications and inspections via a mobile device/app to improve system accessibility and reduce delays is supported.

2. Where relevant, would you use a mobile submission function or are you more likely to continue to use a desktop?

Online Submission Forms

UDIA supports the Panel's recommendation to create a centralized database of Builder's information that is integrated into the e-Planning portal removing the requirement to manually enter Builder's data for each individual application. We also strongly support the modification of the online application form to save and reuse common contacts to auto populate pre-saved contact details. This will assist in streamlining the system and reduce the time taken to lodge an application.

Whilst we support the Panel's recommendation to enable the relevant authority to generate a checklist with each application which identifies the relevant assessment criteria, especially in relation to Deemed to Satisfy applications, it is recommended that such a checklist be made available to the general public to reduce time wading through the pages of policy generated by the current pdf versions. This could be akin to the old 'Residential Code' checklist under the rescinded *Development Act 1993*.

1. Is there benefit to simplifying the submission process so that a PlanSA login is not required?

   The UDIA strongly support the Panel's suggestion of simplifying the submission process of development application's on the DAP system. Currently all applicants are required to have a PlanSA login system that must be generated by PlanSA staff, which can take a number of days. By removing the need to have a PlanSA login created, all South Australians will have access to the system without unnecessary delay.

2. Does requiring the creation of a PlanSA login negatively impact user experience?

3. What challenges, if any, may result from an applicant not having a logon with PlanSA?

Increase Relevant Authority Data Management

1. What would be the advantages of increasing relevant authorities' data management capabilities?

   The UDIA supports any improvements to the e-Planning system that ensure the timely assessment of applications and the reduction in 'double handling' between the relevant authority and departmental staff.

   In addition to providing increased data management capabilities to relevant authorities, it is also recommended that the e-Planning system be altered to enable applicants to upload additional documents between submission and 'verification' of the application. Under the current system once an application has been 'submitted' there is no functionality to enable other documents to be uploaded (even if a document has been accidently forgotten during the lodgment uploading process) until the application has either been 'verified' by the relevant authority or the relevant authority has requested additional documentation be provided on the portal.

2. What concerns, if any, do you have about enabling relevant authorities to 'self-service' changes to development applications in the DAP?

   Any changes to the portal that increase the ability for relevant authorities to manage data should ensure that this improves/expediates assessment timeframes and provides for a more robust and transparent system. The UDIA would welcome the opportunity to workshop possible options for improvement further in this regard.

Inspection Clocks

3. What are the advantages of introducing inspection clock functionality?

   The UDIA supports the suggestion of implementing inspection clocks to ensure the relevant authority undertakes timely inspection after the given of notification. This would also provide greater transparency within the system.

4. What concerns, if any, would you have about clock functionality linked to inspections?
5. What, if any, impact would enabling clock functionality on inspections be likely to have on relevant authorities and builders?

Collection of lodgment fee at submission

6. Would you be supportive of the lodgment fee being paid on application, with planning consent fees to follow verification?

   The UDIA strongly supports the Expert Panel's suggestion of 'locking in' the relevant version of the Code at time of submission of an application by way of payment of the lodgment fee. This will ensure that any Code Amendments that become operational between submission, verification and ultimate payment of fees and official 'lodgment' will not alter the assessment once submitted. This will provide certainty to the development industry and avoid any doubt on which version of the Code should be applied to an application.
   Members have also raised concerns that the Portal currently only allows planning applications to be paid by credit card online. This is difficult when there are multiple applications submitted (ie. 60+ individual built form applications for a master planned project). Members have outlined that it can be a challenge to have a credit card limit able to accommodate this. Most business preference is to pay via EFT however no bank details are provided for PlanSA. Having this updated in the Portal would be a great help for more efficient business practices.

   Further, members have advised that submitting applications on parent titles can be a challenge when new titles are issued. Essentially the whole planning process needs to be done again on the individual title. This is a double up of work and fees, etc. Ideally it would be good if the Portal allowed submissions on the parent title and then when new titles are issued, it could associate the existing approval with a new title reference. This would streamline the process.

7. What challenges, if any, would arise as a consequence of 'locking in' the Code provisions at lodgment? How could those challenges be overcome?

   The only challenge for payment of a lodgment fee upon submission of the application would be for planning practitioners who submit applications on behalf of their clients then being required to pay the lodgment fee. One recommendation could be that once 'submitted' an option would be for a link to be sent to those listed as responsible for 'invoicing' on the DAP system.

Combined Verification and Assessment Processes

8. What are the current system obstacles that prevent relevant authorities from making decisions on DTS and Performance Assessed applications quickly?
9. What would be the advantages of implementing a streamlined assessment process of this nature?

   The UDIA strongly support the suggestion of a combined Verification and Assessment process. Where applications satisfy the DTS pathway or satisfy relevant performance outcome of the Code applications should be approved quickly, reducing frustration, uncertainty and unnecessary expense.

10. What, if any, impact would a streamlined assessment process have for non-council relevant authorities?

Automatic Issue of Decision Notification Form

11. What are the advantages of the e-Planning system being able to automatically issue a Decision Notification Form?

    The UDIA supports the automatic issue of a Decision Notification Form for Deemed to Satisfy forms of developments. This will enable quicker processing times and reduce administrative delays currently experienced in the system.

12. What do you consider would be the key challenges of implementing an automatic system of this nature?

    For Performance Assessed forms of development, especially where public notice is required, the automatic Decision Notification function may be more challenging to implement.

13. If this was to be implemented, should there be any limitations attached to the functionality (i.e., a timeframe for payment of fees or the determination will lapse)?

Building Notification through PlanSA

14. Would you be supportive of mandating building notifications be submitted through PlanSA?

    Whilst the UDIA generally supports the intent of ensuring a streamlined system and reducing 'double handling', concern is raised regarding mandating that building notifications be submitted directly through the PlanSA portal without first ensuring that appropriate technology is in place (i.e. phone or tablet based app) to enable the notification to be made whilst on the job site rather than a desktop pc.

15. What challenges, if any, would arise as a consequence of removing the ability for building notifications to be received by telephone or in writing to a relevant council? How could those challenges be overcome?

16. Would this amendment provide efficiencies to relevant authorities?

Remove Building Consent Verification

17. Would you be supportive of removing the requirement to verify an application for building consent?

    The UDIA strongly support the Expert Panel's suggestion of removing the requirement to verify an application for building consent. This suggestion would further streamline the process and reduce delays in the system. A relevant authority would still retain the ability to request further information pursuant to clause 119(3) of the PDI Act.

18. What challenges, if any, would arise as a consequence of removing building consent verification? How could those challenges be overcome?

Concurrent Planning and Building Assessment

26. What would be the implications of enabling multiple consents to be assessed at the same time

    UDIA Strongly supports the proposal to enable concurrent Planning and Building Assessment. This would reduce the overall timeframe for the assessment process and streamline the approval system. Currently UDIA members experience time delays between obtaining Planning Consent, the relevant authority issuing the DNF and stamped plans onto the PlanSA Portal then not being able to upload their Building Rules Consent until the previous steps have been completed. The proposal to enable multiple consents to be assessed at the same time was a clear intent of the original planning reforms and its implementation should be a priority.

Extract for the Grow Reform Build UDIA document:

> ***Invest in the development of a new real time electronic urban development monitoring tool in partnership with the UDIA, to improve state-wide planning for growth, liveability and affordability, and encourage increased private sector investment.***

Innovation – Automatic assessments check for DTS Applications

The UDIA support the investment in new technologies to enhance and fast track the processing of development applications, such as the suggested automated assessment checks of DTS applications. This could be a useful tool for one-time users of the planning system. A statewide implementation of such a tool in the planning system may alleviate the workload pressures on relevant authorities and improve timeframes particularly within the 'verification' period.

Innovation – 3D Modelling for Development Application Tracker and Public Notification

Whilst it is acknowledged 3D modelling can assist in the ability to interpret plans and understand a development's 'look and feel', the production costs of 3D renders are far greater than 2D plans and take greater time to produce. The requirement to provide 3D renders with applications should be limited to certain classification or zones for example, development of greater than 4 storeys where located within the 'Design Overlay.' This should not be mandated for all development classifications, and ideally should only apply for more significant development proposals.

Innovation – Augmented Reality Mobile Application

Augmented Reality tools provide a useful tool to interpret the 'look and feel' of a development proposal and the ability to 'see it' especially for those not able to interpret 2D plans. Augmented Reality tools would be particularly useful for those larger scale applications that require public notice, however the cost to produce augmented reality 'plans' is far greater than standard 2D or 3D renders. Consequently, the use of such technology should be carefully considered and limited to certain classifications of development or zones, for example development of greater than 4 storeys where located within the 'Design Overlay' or within the 'Urban Corridor' suite of Zones.

Innovation – Accessibility through Mobile Applications

The UDIA support the investment in new technologies to enhance the usability of the PlanSA website and DAP system particularly to cater for mobile devices.

4. Appendix

1. UDIA Submission on Developer Deed Review and Infrastructure Schemes
2. UDIA Submission to the State Planning Commission on Miscellaneous Technical Enhancement Code Amendment (MTECA)
3. UDIA Submission on Land Supply Reports and State Planning Commission EFPA review
4. UDIA Grow Reform Build 2022

The above reports have been supplied as attachments to DTI.PlanningReview@sa.gov.au on Friday, 16th December 2022.

e udiasa@udiasa.com.au
t 08 3859 3000
w www.udiasa.com.au

Urban Development Institute of Australia
(South Australia) Inc.
Level 1, 26 Flinders Street
Adelaide SA 5000

6th August 2021

Ms Helen Dyer
Chair
State Planning Commission
Level 5, 50 Flinders Street,
Adelaide SA 5000

Dear Ms Dyer

RE: Environment and Food Protection Areas (EFPA) Review 2021 Statement of Position released by the South Australian State Planning Commission (SPC)

Please find attached the Urban Development Institute of Australia (UDIA) submission in relation to the recently released Environment and Food Protection Areas (EFPA) Review 2021 Statement of Position released by the South Australian State Planning Commission (SPC).

In terms of the legislated requirements for review, it is of concern to the UDIA that the SPC has wrongly narrowed the scope of the EFPA review under section 7(10) of the Act and is undertaking the review too far in advance of the legislated review date (at some time after 1 April 2022). The attached legal advice from Botten Levinson Lawyers details the problems with the review as it is presently framed.

Notwithstanding the SPC is able to conduct a review from time to time under section 7(8) of the Act, the UDIA believes the SPC should undertake the five yearly review in accordance with the requirements of the Act and not foreclose any consideration of the relevant issues. We maintain that this will require the review to be undertaken in 2022 having regards to all of the matters relevant to section 7(3)(a) of the Act. This will require proper consultation on the land supply matters (at or close to April 2022) that the present review wrongly states are not open for discussion.

In addition to the above, we are concerned about the use of the associated Land Supply Reports. Rather than shaping Adelaide in the most appropriate way to take account of new trends in living patterns or addressing affordability to maintain Adelaide's liveability, it appears they will be utilised as references to either approve (or not) future developments based on the historical patterns of development that have been extrapolated into future forecasts.

We are also concerned about the assumptions underpinning the reports (see attachment). It is the incorrect assertions about excess land supply that have too often been used as a reason for restricting development because of the government's reluctance to invest in infrastructure, which unfortunately is at the expense of the primary driver in maintaining housing affordability, namely competitive market tension.

Despite our repeated offers, the release of such important supporting documents with no formal consultation is disappointing. Without addressing these concerns, we fear for the State's overall liveability and affordability and the significant and unnecessary risk to the State's economy.

The UDIA will continue to offer its support to work with the Department to take advantage of important industry insights, and we look forward to discussing this submission with you in more detail.

Regards

Pat Gerace
CHIEF EXECUTIVE

Attachment 1: Environment and Food Production Areas Review 2021 Submission (UDIA)
Attachment 2: Legal Advice - Botten Levinson

CC- Deputy Premier, Attorney-General, Hon Vickie Chapman MP

Attachment 1: Environment and Food Production Areas Review 2021 Submission (UDIA)

This submission contains commentary on:

1. EFPA review process to date and associated legislation
2. Status and use of Land Supply Reports as planning policy
3. Land Supply and EFPA Report – Assumptions and Scenario Analysis
4. Land Supply Report for Greater Adelaide – Greenfield
5. Land Supply Report for Greater Adelaide – Urban Infill
6. Land Supply Report for Greater Adelaide – Employment
7. Environment and Food Production Areas Review 2021 – Statement of Position
8. Recommendations

EFPA review process and associated legislation

While the review of the EFPA did not ask for commentary on the Planning Development and Infrastructure Act (PDI), unfortunately the consequences of the Bill passed are now evident.

The UDIA was very clear at the time of the implementation and during the debate of the PDI Bill that it did not support the inclusion of the Environment and Food Protection Areas within the legislation as drafted for several reasons.

We said at the time the framework was flawed and designed so that there would never be any changes. We are now faced with a situation where the supply of land and affordability of housing in certain areas is at a very significant risk as a result.

At the time the UDIA stated:

> *By requiring Parliament to legislate to amend the boundary presents a great risk for South Australia in its capacity to quickly respond to future challenges and is likely to lead to it only reacting in a time of crisis. Through the current policy and zoning regimes an effective boundary is already in place. A legislated urban growth boundary may only cause future speculation and adversely impact home affordability and choice.*

The UDIA believes the objective evidence and existing policy landscape was more than sufficient to ensure that Adelaide's growth could continue to occur in an orderly and sustainable way.

The implementation of the boundary as part of the Act included no meaningful consultation on the location of the boundaries and was only provided days before being laid on the table in Parliament.

The Government at the time provided no modelling or objective analysis about the conclusions that it had come to with respect to these boundaries and was an example of bad public policy which ultimately succumbed to parliamentary fatigue.

Despite our warnings, included in the Bill was the requirement that future reviews of the boundary on a five yearly basis would be required by the SPC, but parliamentary scrutiny and oversight would be required for that to take effect. The UDIA stated at the time that things can change rapidly and the need for addressing the location of the boundaries must be more flexible. The significant hurdles, namely parliamentary approval was flawed from the outset because it would be next to impossible to amend despite the touted objectivity. We believe that this level of detailed planning policy should not be subject to the full parliamentary process.

Policy decisions around the definition of available supply within the Act also fail to recognise the many nuances of planning for Greater Adelaide. This composition of dwelling types, requisite infrastructure, supply in various submarkets, the difference in prices and product types all factor into the liveability of Adelaide.

Following the passing of the Bill on the 12th of April 2016 the UDIA wrote to the then Minister and expressed our concern at the very broad criteria specified in the Act that the Commission has to consider. We said at the time:

> *The criteria refers to fifteen years supply and we urge you to ensure that this applies in all identifiable locations. For example this should apply to townships surrounded by the Environment and Food Production Areas as well as each council area (particularly metro). Any measure of supply should not be satisfied by pointing to one or two growth areas only.*

and

> *Finally, underpinning all the above is housing affordability. This needs to be a key criteria to ensure that house and land prices per square metre are significantly lower than all other mainland capitals.*

Following raising these matters, the UDIA has consistently requested information from the Government about what it called its Metropolitan Growth Management Plan, and what we understood to be the basis for how the Department would inform the SPC as part of its statutory obligations under the Act.

We expressed concern about the Department's pilot project in the City of Onkaparinga, met with the former chair of the Planning Commission about this, and also expressed on numerous occasions to the former Minister the need for work to commence with meaningful consultation to inform any conclusions. Unfortunately, with the release of the Statement of Position and recent Land Supply Reports the UDIA concerns have now been realised.

We are seeing for only the first time the type of analysis that the Department has been doing to conclude that the legislative thresholds for boundary adjustments are met or not. It also appears the Department has still not defined exactly how it would be applying the legislative test that relates to "*the principle of urban renewal and consolidation of existing urban areas"* and "*adequate provision cannot be made within Greater Adelaide outside environment and food production areas to accommodate housing and employment growth over the longer term".*

As mentioned in our cover letter, in addition the UDIA has sought legal advice which also disputes the interpretation in the SPC's Statement of Position that these questions are not required to be addressed (attached).

<u>Status and use of Land Supply Reports</u>

Included in the *Land Supply Report for Greater Adelaide Background and Context* paper in section *1.4 How it will be used?* it states:

> *"This information will be used as an evidence base to determine the capacity of the land use planning system to provide an adequate supply of appropriate land to meet this demand"*

and

> *"In particular, the report will provide base line data to help inform deliberations on the rezoning of land for residential and employment activities."*

In addition to the previous comments raised above together with the detailed commentary on the reports further on, the UDIA is concerned that instead of these land supply reports being used to inform future policy frameworks, they are being used instead as assessment tools.

We believe that development approvals based primarily on supply alone ignore the nuances of differing products and the role of private sector competition. We are concerned future code amendments and development will be at risk because assessment will be framed in the context of the inaccurate available supply that these reports conclude.

One of the other concerns is the conclusion related to general infill. The UDIA strongly supports strategic infill within metropolitan Adelaide, and we commend the Department for the first time categorising the types of infill, we are however concerned about the level of supply predicted from general infill.

It is general infill that has caused considerable community angst and the SPC itself spent considerable time working on developing infill guidelines because of the backlash around the impacts of this unplanned development.

General infill development does not make a contribution to the enhancement or upgrading of existing infrastructure networks and it is particularly concerning the reliance on this as a key part of supply considering the Department's own *Background and Context* reports itself contains submissions by utilities who explicitly state that "t*runk infrastructure in more established urban areas is aged and was not designed to accommodate the increased demands currently being generated by urban infill*".

The UDIA has long been aware of these issues, and in fact it was the UDIA who convened a roundtable with Minister Knoll, the SPC and major utilities in March 2019 to raise these very issues.

In contrast, greenfield development and strategic infill are required to make sure much of the infrastructure is properly planned and provisioned for with contributions made by developers. General infill only contributes to the Planning and Development Fund upon the creation of allotments with none of those proceeds addressing any of the local issues created.

<u>Land Supply and EFPA Report – General Commentary</u>

The Land Supply reports will be used as an input to the upcoming review of the 30 Year Plan. As such getting the data and analysis correct is of considerable significance. Whilst the reports have considered medium and high growth scenarios the report has not undertaken appropriate scenario analyses. These reports should be seen as a resource for other work not as an outcome in themselves. The process these reports are involved in should be about seeking growth opportunities in infill and greenfield locations. Maintaining or enhancing housing affordability is considered to be a key principle in the analysis of data and scenarios as well as the determination of policy responses.

The Land Supply reports are largely based upon June 2020 data. Since that time COVID19 and the Federal and State Government's responses have led to typical urban development patterns being changed somewhat. Whether these changes are short term or longer term in nature are unknown at this stage. As a result, the range of potential forecasts that need to be considered are wider than is typically the case.

The demand for the future creation of allotments and dwellings has relied upon the Centre for Population forecasts. Their Population Statement was issued in December 2020 which means much of the work would have been undertaken in the preceding months relying upon data that is probably close to 12 months old and not being aware of how the Federal and State Governments have subsequently dealt with COVID19 and in particular actual Net Overseas Migration (NOM) and Net Interstate Migration (NIM) in the past year. The assumed rapid rebound to having NOM being at around 100,000 pa in 2023 and 200,000 pa in 2024 might be somewhat ambitious given the recent four step plan announced by the Federal Government. If a delay in achieving those NOM numbers occurs then it is likely that there will be a reduction in demand in the mid 2020s from what has been stated.

We are also concerned about the reliance on dwelling commencements and completions as a measure of supply. The implications of this are that accurate data can be eighteen months to two years behind what the true supply levels are due to the time from signing a contract to building time due to civil construction etc.

Australia's response to COVID19 could well mean a greater demand from other countries' peoples seeking to immigrate to our country. As such depending on Federal Government policy with regard to allowing more migrants into Australia in a few years' time the NOM could easily be higher than stated.

The Population Statement has the NIM being negative for SA from 2022 onwards. The SA NIM had been slowly heading towards a 0 figure prior to COVID19 and has been a small positive number (98[1]) in the last 12 months. "The State Government is attempting to attract more interstate migrants and bring ex-South Australians home by selling the lifestyle benefits, lower house prices and availability of high-tech jobs in the space, defence and hydrogen industries. It is using a rebadged $200-million Jobs and Economic Growth Fund to target industries such as space, hydrogen, plant-based foods and defence with business development funding."[2] To assume the SA NIM will head back to around -3000 pa means the Growth State[3] strategies the State Government has been putting in place to reverse that loss won't work.

With Adelaide being ranked the 3rd most liveable city[4] in the world and the 3rd most honest city[5] out of 75 world cities, the attractiveness of Adelaide has the potential to increase the demand from local and overseas sources beyond what has been considered in the reports. Housing affordability relative to other capital cities in Australia is a positive factor and is something that we can't afford to lose.

The High Growth scenario in Table 2 for 2020 – 2030 has a lesser growth than the previous decade. The UDIA is concerned that the High Growth Scenario is not as high as it plausibly could be. If demand is higher than forecasted then affordability issues will arise, and quickly. Enabling more land to be developed, whether that be for greenfield or infill, is a lengthy process. On average the time it takes for a greenfield development to go from a piece of rural land through the strategic planning process, then rezoning, then gaining development approvals to building the first dwelling is 13 years. This is largely due to the infrequent nature of strategic planning processes. If you get the strategic planning slightly wrong then adverse outcomes can easily arise.

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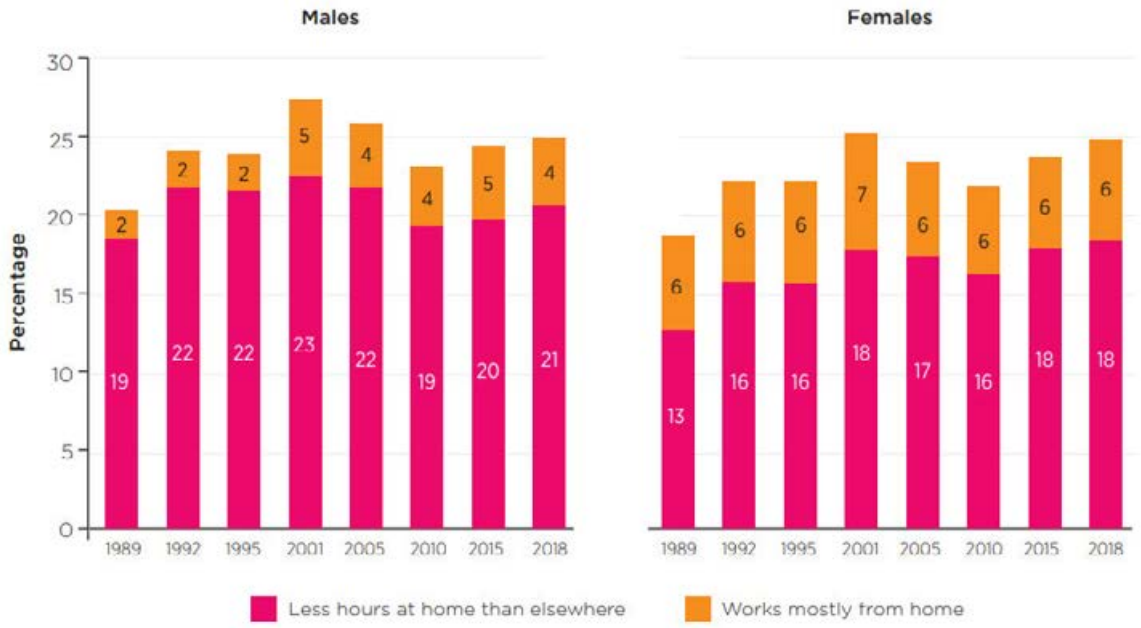
[1] ABS – media release 4 May 2021
[2] The Urban Developer – 15 July 2021
[3] www.growthstate.sa.gov.au
[4] Economic Intelligence Unit Global Liveability Index 2021
[5] TWINNER-20210304_Honest-Cities-Index_EN.pdf

Whilst the report has a section on trends that are likely to influence urban development and the growth in peri-urban and regional towns near Adelaide is mentioned there is no mention of the work from home shift in the past year. The historical longer term 'works mostly from home' percentage has been around 5% of employees, with it being lower for males and higher for females as seen in the table below[6].

Figure 10: Working from home, employed persons, 1989–2018



Note: Employed persons working at least 50% of their usual weekly work hours at home were classified as working mainly from home.
Source: ABS Working from home survey (1989, 1992 and 1995) and HILDA 2001 to 2018
Credit: Australian Institute of Family Studies 2020 (aifs.gov.au/copyright)

In February 2021 around 41%[7] of employed people in Australia worked from home at least one day a week which is considerably higher than the approximately 20% in 2018. Should a minor but sizeable chunk of the workforce either mostly work from home (say 10 – 15%) or at least a day or two per week (possibly another 15 - 20%) there are considerable impacts on urban development and management of our urban areas that will arise. The report has not considered such a scenario and its impacts on expected demand in the 10 areas.

The household ratios used in Table 3 (p.22) range between 2.08 in the Inner Metro area to 2.28 in the Outer South. These appear to be averages across the areas as opposed to what actually occurs in new development in those areas, whether that be greenfield or infill. It is common for greenfield estates to have household ratios of around 3.0. Even the strategic infill development of Lightsview, which is a medium density infill project, has a household ratio considerably higher than 2.08.

With the Homebuilder grant boosting dwelling approvals and commencements substantially in the last 9 months the report should discuss what the impact of this will be on demand in the remainder of the 2020 – 2030 period.

It appears that the forecast lot/dwelling numbers have not considered the Planning and Design Code policy that was introduced on 19 March 2021. This is discussed further in the Infill section below.

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[6] Australian Families Then & Now: How we worked (aifs.gov.au)
[7] ABS – media release 17 March 2021

Section 3 – Infrastructure, is considered to be, at best, a cursory glance at the issues associated with infrastructure. There is no analysis of the few issues mentioned in terms of the potential impacts on achieving greenfield and infill estimates of new lots/dwellings in the 10 areas that make up Greater Adelaide. For example, in Section 3.3 (Water Network) the issue of understanding infill hotspots and the consequential impact on required upgrades is mentioned but there is no analysis of what this means either at a whole area basis or a local government area basis or a suburb or part of suburb basis.

In Section 3.5 Electricity Network it states SAPN has a $1.6B infrastructure cap until 2025. There is no information in the report about where that spend is to be located and what areas it might assist in improving the ability to deliver infill and/or greenfield development.

Section 3.6 Transport Network does not provide any useful information about what is to be provided where and whether that is going to assist with achieving estimated lot/dwelling numbers in the 10 areas.

The issue of funding models is complex. With the corporatisation and privatisation of infrastructure agencies in the past few decades the frameworks that SA Water and SAPN, in particular, have to operate within are subject to national rules as well as SA Acts which have other players, such as ESCOSA, involved. The individual frameworks are somewhat clunky when you try to bring together all the infrastructure providers to plan and deliver potential solutions.

It is considered critical to the making of policy and infrastructure investment decisions that capacity analysis at a small scale is essential in order to work out where the challenging areas are and what needs to be done to fix them. There is no point implementing planning policy changes that allows greater development potential (ie increased density) if the infrastructure can't cope.

Land Supply Report for Greater Adelaide – Greenfield

The categories in Table 1 are a good start however the Undeveloped Zoned category needs further refinement. Some land that is zoned is unable to be developed viably due to a lack of infrastructure capacity or the scope of the upgrade is so large it overwhelms the scale of the development making it not possible. Splitting it into two subcategories is worthy of consideration –

. Undeveloped Zoned – infrastructure available

. Undeveloped Zoned – Infrastructure unavailable/unviable

The vacant lots column in Table 2 is June 2020 data. Since that time virtually all vacant lots have been sold due to the Homebuilder grant, so more recent data is essential.

The High Growth Scenario dwelling demand on 38,300 lots to 2030 needs all the Development Ready and 25% of the Undeveloped Zone land to be developed. It is highly likely the demand won't be spatially distributed as per the supply in Figure 1. If anyone were asked in 2010 what the demand for lots would be in Mt Barker they might have said 100 lots pa. Over 600 lots pa are now being developed in Mt Barker in 2021. The market can change considerably over 10 years.

In the Outer North under the High Growth Scenario the report states there will be demand for 16,400 dwellings with 13,000 coming from greenfield estates. This leaves 3,400 to come

from other sources, presumably infill. If the infill numbers are not able to be achieved then more will come from greenfield sources. Notwithstanding the greenfield land available, some do face infrastructure issues.

Table 4 has substantial amounts of supply controlled by a limited number of estates which are expected to take beyond 2030 to be fully developed. The table gives the impression that all lots will be developed by 2030 in these estates.

We are unable to determine if the 43ha of land at Karbeethan was included in the land available for development as it is zoned Future Urban, however it has been allocated for district open space.

We are also unsure if the potential dwelling numbers in Virginia considered the impact of flood affected land.

The remaining approximately 290ha of land at Blakeview has been assumed to deliver 5655 dwellings at just under 20 dwellings per hectare in gross terms. This is considered to be a high estimate given the need for drainage networks, open space, a school and activity centres.

In the Outer South rezonings will need to occur as the High Growth Scenario demand is 4100 dwellings and supply is 4174 dwellings in the Development Ready and Undeveloped Zoned categories. At present supply beyond 2030 is dependent on development occurring at Aldinga, Hackham and Sellicks Beach. (Despite community groups trying to stop development at Sellicks Beach) Additional long term supply (eg: Bowering Hill) should be considered which will inevitably involve land in the McLaren Vale Character Preservation area.

In the Adelaide Hills area the demand between 2020 and 2030 is estimated at 300pa. Given Mt Barker is delivering 600 dwellings pa at present and there are other townships that are growing it is considered the demand levels are more likely to be in the order of 5 – 7000 in total. There is little land available in many of the townships at the northern end of the area (eg: Kersbrook, Gumeracha, Birdwood). No analysis of potential infill for any towns in the entire area has been undertaken. If the ongoing response to COVID19 is that peri urban areas are in greater demand then there will be a considerable supply problem in many towns.

There has been no analysis made as to the appropriateness of the Hills Face Zone boundary which traverses Outer North, Inner North, Inner Metro, Inner South, Outer South and Adelaide Hills areas.

The Fleurieu area is expected to run out of supply in some towns before 2030 without rezonings occurring as demand will not pan out as per supply availability.

In the Northern Plains and Barossa area the figures are incorrect for Freeling. A sizeable part of the town (not impacted by EFPA) is still zoned Rural yet is counted in as Undeveloped Zoned. This should be categorised as Future Urban Growth.

<u>Land Supply Report for Greater Adelaide – Urban Infill</u>

Having the split between strategic infill and general infill is a useful planning tool. The 2010 – 2020 decade provided 22,600 dwellings classified as strategic infill and general infill provided 49,600 dwellings.

It is the UDIA's position that the outcomes achieved through strategic infill sites is far superior to the vast majority of general infill sites. The concerns about infill development raised by the community[8] have largely come from general infill (one into two dwellings). As such, finding more strategic infill sites should be a priority so that well planned, well designed and carefully implemented redevelopment projects are delivered. These could take the form of areas under multiple ownership.

The Land Supply report is heavily reliant on one into two developments so the factors that impact the ability to deliver such development are crucial.

The calculation of General Infill land supply by PLUS is summarised on p21 of Part 2 – Urban Infill. This set of assumptions are considered to be reasonably robust, however there are some nuances that might have been applied in those calculations that are not obvious. For example, how have the relevant zones been applied to assess redevelopment yields? Much of the Inner Metro area is subject to the Established Neighbourhood Zone and Suburban Neighbourhood Zone. The ability to increase density in these zones is very limited. It does not appear an analysis of minimum lot sizes and frontages against the zone policies as well as taking into account heritage area overlays, regulated and significant trees, tree planting requirements, on street parking, etc, was undertaken to see whether redevelopment is realistic.

The recently implemented Planning and Design Code policy relating to infill development has limited development potential, with a series of Missing Middle development typologies not being allowed in the vast majority of infill areas.

Even with the Planning and Design Code's General Neighbourhood Zone which covers large areas between Regency Rd and Grand Junction Rd and then around through the western suburbs (Inner North and Adelaide West areas) the zoning policy typically only allows one into two developments due to existing allotment sizes.

The limited Planning and Design Code policy regarding infill development on consolidated sites is unlikely to achieve much due to the policy metrics.

Anecdotally our members are already experiencing Councils using Deemed To Satisfy policy as the minimum policy when assessing Performance Assessed proposals.

In assuming 40% of sites with a Capital Value / Site Value Ratio (CVSVR) of 1.3 or less will be developed in the next 10 years, has consideration been given to the impact of existing lot sizes (e.g. removing lots below a certain threshold from redevelopment), proximity to noxious or licenced premises (e.g. Incetec Pivot in the past in Port Adelaide, OI Glass in Kilkenny etc.) and the exclusion of all strata title and community title lots (which are almost impossible to amalgamate and redevelop)? The requirement for infrastructure upgrades to enable infill development to occur is not dealt with by using the CVSVR tool.

If suitable allowance has been made for these types of factors, then the issue comes down to whether a 40% redevelopment over a 10 year period across all geographic areas is realistic. Table 4, p13 suggests that the top general infill suburbs have typically operated well below this level in the past decade. It is considered that the 40% figure for CVSVR of 1.3 or less (and 20% for CVSVR of 1.3 - 1.8) is far too high.

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[8] State Planning Commission – Raising the bar on Residential Infill in the Planning and Design Code September 2020

Furthermore, the calculation represents an average across all sites meeting the CVSVR threshold, regardless of geographic location. This means that the Inner North, in particular, needs to deliver a very large number of general infill dwellings (28,285 compared with 11,100 for Adelaide West). This region will rely upon extensive redevelopment in areas such as Ridgehaven, Redwood Park, Banksia Park, Surrey Downs and Fairview Park, 15 – 20km from the City. Much of these suburbs are on sloping ground which will make it more challenging to deliver infill housing.

The progressive development of preferred locations may impact upon the take up of remaining opportunities for infill. Adelaide West has been a focus of redevelopment, but will provide fewer opportunities in the future (as reflected in PLUS projections). Will developers and more importantly purchasers readily shift to less prime infill locations?

The report has no analysis of infill capacity in the Adelaide Hills, Northern Plains and Barossa, Fleurieu, and Murray Bridge areas. Many towns in these areas have dwellings that are 80 + years old and are likely to have a CVSVR of <1.3. This potential supply needs to be taken into account.

The above issues relating to infill development are considered to mean that achieving the targets for general infill development stated in the reports are highly ambitious.

The strategic infill supply as shown in Figure 21 is heavily reliant upon three elements – Cheetham, CBD and the Corridor Zones. It is considered to be highly unlikely that a single developer estate such as Cheetham will deliver more than 300 lots per annum once the project actually commences. If the site is rezoned in 2022 and civil construction works begin in 2023 the project might deliver 1800 lots over the decade. Will the Adelaide CBD deliver 10,000 additional dwellings when at least the first third of the 2021 - 2030 decade is going to have much lesser numbers of overseas students. There are very few apartment projects being proposed at present, and given they typically have a 3 year development period it is likely that only 2 – 3000 dwellings might get developed. Other than Churchill Rd the corridors have been delivering about one hundred dwellings per annum. There are many businesses and residents along the corridors that are not ready to sell to a developer and this will continue to be the case. It is considered that 3 – 4000 dwellings might get developed along corridors in the 2021 – 2030 decade.

Whilst the Cheetham site has been identified as a future strategic infill site, why have other sites not be included? The Blair Athol / Kilburn renewal being undertaken by the South Australian Housing Authority is not mentioned. Other examples include the 15ha SA Water site on Frederick Rd West Lakes and the Metcash site at Kidman Park are known sites for future residential development even though they require a Code Amendment. We believe there are other sites that should also be considered. The report also does not mention how strategic sites were selected.

The remaining strategic infill sites in Table 9 total just over 12,000 dwellings/lots. Section 5 states the realistic short term dwelling potential from general infill is 68,200. However if the 40% assumption for the CVSVR of <1.3 is incorrect and is more like 20%, and the 20% assumption for the CVSVR lots between 1.3 – 1.8 is more like 10% then the general infill supply drops from 68,222 to 34,111.

With demand for infill in the High Growth Scenario (Table 6) across the Greater Adelaide Capital City area being 58,550 this essentially just meets the supply (under the scenario described above). If this scenario were to eventuate then there maybe price pressures arising which will make the delivery of affordable housing more difficult.

Land Supply Report for Greater Adelaide – Employment

There is a lack of analysis of how much land is needed for the population serving uses that typically locate on the periphery of centres, along arterial roads and in commercial and light industrial areas when population increases in areas (both infill and greenfield). These types of jobs are the largest number and are expected to remain so to 2030 according to Figure 10.

Commercial and Mixed Use Zones should be included in the analysis as they accommodate many jobs. Some areas in Inner Metro and Adelaide West and some in Inner South are no longer suitable for industrial and warehousing uses due to poor heavy vehicle access and the potential replacement jobs in knowledge intensive industries often don't see these locations as being suitable. There is no analysis for the Adelaide Hills, Northern Plains and Barossa, and Fleurieu areas. The section on Employment Trends is thin.

Environment and Food Production Areas Review 2021 – Statement of Position

Further to the earlier comments and attached legal advice, there are certain areas within Greater Adelaide that are expected to have supply challenges to a point that affordability issues will continue to arise. It is already almost impossible to develop three-bedroom housing within 10-15kms of the CBD that meet the affordable housing price point without external or internal subsidies. The lack of analysis of areas in terms infrastructure capacity is of serious concern.

The table below has used information from various tables in the Land Supply Reports and it shows that demand to 2036 is going to cause serious affordability issues unless land is rezoned to enable more development to occur in the Inner South and Fleurieu areas.

Area	High Scenario Dwelling Demand to 2036	Greenfield Development Ready/ Undeveloped Zoned lots	Realistic General Infill lots	Strategic Infill lots	Total lots
Outer North	25,300	46,300	4,434	0	50,734
Outer South	11,900	4,200	9,563	2,100	15,863
Inner North	20,600	0	28,285	12,400	42,685
Inner South	10,500	0	5,683	4,700	10,383
Adelaide West	24,500	0	11,100	20,000	31,100
Inner Metro	22,000	0	8,798	28,200	36,998
Adelaide Hills	6,200	13,000	359	300	13,659
Fleurieu	7,800	7,500	?	?	7,500+
Northern Plains / Barossa	3,500	4,700	?	?	4,700+
Murray Bridge	2,600	6,300	?	?	6,300+

If our analysis of a more realistic expectation of infill being able to provide supply is close to being correct then supply issues will occur in Inner South, Outer South, Fleurieu and Adelaide West, as well as the northern part of the Adelaide Hills.

There are a number of places where the EFPA boundary dissects cadastral boundaries (eg: One Tree Hill, Inglewood, Lobethal, Summertown, Mount Barker and Ashborne). The EFPA should not arbitrarily dissect cadastral boundaries as this can lead to confusion as to the process for any land division application.

Recommended Actions

The key objective for the State Government should be to have a better approach to having a quality land supply process that leads to having the capacity to deliver affordable housing in all areas. This will require better and more timely data analysis which should be much simpler to achieve now the e-planning system is in place. Updated data and analysis for the Land Supply reports is needed in the next year. We cannot wait another five years for this to occur.

The following actions are considered necessary:

- Revise the EFPA report once the Land Supply Reports are updated so that analysis of the supply / demand for each of the ten areas is undertaken
- The Outer South needs more than 1000 lots rezoned in the very near future to minimise the affordability issue due to a lack of supply.
- Long term supply (beyond 2030) needs to be considered in the Outer South beyond Hackham, Aldinga and Sellicks Beach.
- A review of the peri-urban township boundaries is required.
- A more refined analysis of urban infill potential is required.
- More strategic infill sites need to be identified and rezoned.
- Infill potential in peri-urban areas such as townships in the Adelaide Hills area is required to be investigated.
- Alternatives to the one into two infill developments are needed which should include masterplanning infill areas under multiple ownerships where individual development attends to the upgraded infrastructure requirements.
- The zoning policies across large areas of Adelaide West, Inner Metro, the southern half of Inner North, Inner South needs amending if demand for infill is to be achieved.
- Better capacity analysis of infrastructure is required in both infill and greenfield locations
- PLUS to devise and implement a housing demand and supply monitoring program using live data and reporting publicly on a quarterly basis in conjunction with the UDIA

DTI:PlanSA Submissions

From: Urban Future Exchange [redacted]
Sent: Monday, 6 November 2023 12:55 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Planning a Greater Adelaide - UFX Submission on the Greater Adelaide Regional Plan.pdf

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

Good afternoon,

Please find attached the Urban Future Exchange's submission regarding the Greater Adelaide Regional Plan Discussion Paper.

If there are any points raised in the submission that you would like us to clarify or expand upon, we would be more than happy to.

Thank you for all of your work so far, and we look forward to seeing the engagement report and draft plan in due course.

Thanks,
Ned Feary

Planning a Greater Adelaide - UFX Submission to the State Planning Commission on the Greater Adelaide Regional Plan

Dear Commission Members

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper (Discussion Paper). UFX congratulates the State Planning Commission (Commission) on the work undertaken to date and the commitment to engage with the South Australian community on this paramount plan for the State.

Urban Future Exchange (UFX) is a provocative and politically savvy social enterprise, leading progressive discussion in urban studies and related disciplines, in pursuit of an urban future for South Australia that is healthy, confident, equitable and sustainable.

Our membership is broad and balanced and includes individuals and corporate associate members from the public, private, not-for-profit and academic sectors. Our members have qualifications and expertise in urban planning, law, design, industrial design, business, health, sustainability, industry and policy amongst many others. As such, the UFX provides a unique and diverse view on South Australia's urban and regional future.

UFX has a strong interest in the development of the Greater Adelaide Regional Plan as it will significantly shape the way our urban future is planned and realised.

UFX's submission is targeted and primarily seeks to add value to the conversations that will occur during the development of the draft Plan.

Outcomes for Greater Adelaide

Proposed Outcomes

The four outcomes proposed by the Commission are sound and supported in principle. UFX makes the following suggestions for consideration:

1. There should be *a greater choice of housing that is **affordable** and in the right place.*
2. Access, which is critical to urban and regional planning, and central to the *Living Locally* theme, is currently underrepresented in the outcomes, and in the paper more broadly. UFX believes there are two ways that this can be addressed:

    a. Reshape the *A more equitable and socially - cohesive place* outcome to have greater focus on access; or

b. Create a fifth outcome with a title such as; *A region where housing, employment and services are easily, timely, sustainably and affordably accessed.*

Major trends and drivers

The major trends and drivers are sound and supported in principle. UFX suggests population and demographic trends should also be considered. In particular;

- South Australia's ageing population is likely to prefer smaller, more compact housing within established residential areas that are also very close to services, public transport and areas of high amenity.
- South Australia's young people, particularly those that are at risk of leaving the State, are likely to prefer smaller, denser urban areas with strong immediate access to diverse events and experiences.
- There should be greater diversity and flexibility in housing to cater for all stages in life.

Planning the densities we need

UFX is supportive of infill and greater densification across Greater Adelaide. Densification can:

- enable greater utilisation of existing infrastructure;
- increase active and public transport use;
- reduce pressure on valuable agricultural and natural land;
- create more dynamic and interesting urban environments;
- stimulate local businesses; and
- foster better community health and wellbeing.

Density is also important in ensuring the financial viability of public services, as shown through the work of organisations like Urban3 in the USA.

Much has been made in recent years about the importance of infrastructure coordination. This is reflected in the Discussion Paper, but UFX is concerned about the practicalities of this.

The 30 Year Plan for Greater Adelaide was accompanied by the Integrated Transport and Land Use Plan. UFX believes that this integration was the correct approach, but unfortunately this was never fully implemented. A fully coordinated land use and infrastructure strategy should be the goal for such regional plans.

Fundamentally, infrastructure coordination is much easier when that infrastructure already exists. This is why UFX believes that infill development should be prioritised over Greenfields development.

The principle of transparency of costs is also strongly supported. Factoring in lifecycle costs from the beginning, rather than focussing purely on capital costs is an important part of good long term planning.

Planning the housing we need

UFX is supportive of greater housing diversity across Greater Adelaide, including;

- greater choice of housing types in *all* places.
- greater access to affordable housing in *all* places.

Applying the right housing diversity policies in the right locations is paramount. Along with familiar housing types such as semi detached dwellings, apartment buildings and etc, below are a number of innovative ideas/examples that could also be viewed as also suitable for wide range of locations:

- Enabling ancillary dwellings (granny flats) on larger sites (i.e. >600m) with low site coverage ratios (i.e. <50%). Greater Adelaide has an abundance of sites like these in the middle and outer ring suburbs that could easily accommodate affordable ancillary dwelling units.
- Enabling house over garage/mews dwellings on lots that are rear/side loaded (have vehicle access from a laneway or other form of access).
- Converting existing dwellings into two or more dwellings. This option would suit dwellings/areas where preservation is emphasised and/or demolition is restricted/prohibited. This would also provide affordable rental outcomes in well-established and/or higher land value areas.The reverse would also be possible, should market demand drive such an outcome.

UFX believes that further consideration needs to be given to how to better encourage an ecosystem of small and medium sized developers. This will allow for better risk distribution across the development sector, as well as allowing for more innovative practice.

Planning the transport options we need

UFX is supportive of focussing development along transport spines. However, it is imperative that growth is focussed on public transport and active transport spines, not only car transport / road spines, as canvassed in the Discussion Paper.

The focus on road spines is contradictory to a number of paramount principles, including:

- climate change mitigation,
- better utilisation of existing infrastructure and services,
- better health and wellbeing
- equitable and affordable access and choices, and
- increasing public and active transport amongst many others.

The Discussion Paper notes that 29% of the state's carbon emissions come from the transport sector, and it is inarguable that a significant portion of this comes from traffic within Greater Adelaide. A focus on carbon emissions, however, hides the other implications of car-dependent development, including:

- Air pollution from vehicle tyres;
- Underutilised land for roads and parking areas;
- Social isolation for people who cannot drive; and,
- Increased cost of living due to the cost of running a car

UFX believes that increasing the modal share of bike riding and walking is essential to a sustainable urban future. UFX has previously provided submissions on the draft SA Cycling Strategy and the draft Walking Strategy, which explored this further.

As noted above, our present system of disconnected strategies is a missed opportunity for an integrated strategy setting which can facilitate better outcomes. This is particularly true for active transport, where the disjointed network fails to take advantage of the many benefits of these modes.

Focusing infill development in areas with quality active transport infrastructure (e.g. along the Linear Park Trail) would be a step towards achieving a better outcome. Furthermore, leveraging substantial infill developments as an opportunity to improve active transport links through street upgrades and public realm improvements, will be important.

While housing will naturally take all the headlines when it comes to affordability, Australians spend an average of 14.9% of their income on transport, and the average Adelaidean in 2022 spent $17,785.56 on running their car according to BudgetDirect. Fuel price increases are a major part of the current cost of living crisis, which shows little sign of easing.

Diversifying our transport options, and allowing households to live “car-lite”- with no or one car per household, rather than one car per person- would allow for significant savings for household budgets. However, people need to have the confidence in alternative modes of transport to be able to make this decision.

Ultimately, we need to shift away from car-dependent suburban development. The GARP should address how this can be achieved.

Planning a greener, wilder and resilient environment

Climate change is naturally a vital consideration in the GARP. It, and other planning documents and tools which rely upon it such as the Planning and Design Code, must do more to both mitigate, and adapt to, climate change.

The planning system should encourage innovation in sustainability (noting that this is not solely climate related outcomes), and there is a role for larger developments to act as "role models" to show the sector more broadly what can be achieved.

UFX believes that there are a series of key measures that can contribute to this outcome.

Firstly, UFX believes that more needs to be done to increase urban tree canopy, and pervious surfaces, with the greatest opportunities for impact being on private land.

UFX notes infill development is usually characterised as the primary cause of tree canopy cover loss. Infill development is not the cause of this, insufficient tree policies are. UFX would like to see better tree protection policies in place, not the loss of urban infill. UFX made further commentary on these points in our submission to the Planning System Implementation Review Expert Panel.

Greenfields development also presents environmental challenges, and UFX is concerned about this in some way being viewed as an "environmentally friendly" option. UFX is concerned about this disconnect between this outcome, and the focus in the Discussion Paper on greenfields development and satellite cities, given the car-centric spines proposed.

Increasing urban density must lead to improved public open spaces. Increasingly, people look for "low maintenance" living options, which means less private open space, but a greater demand on hgh quality and green public open space. It is also important that this is appropriately channelled into the areas that really need it.

Protecting mature trees in greenfield areas should be a particular priority as they provide an important element of maturity in an otherwise "young" area. It is imperative that masterplans plan around mature trees, and incorporate them into new areas of open space.

Planning a smarter cleaner regenerative future

UFX is supportive of planning for a strong economy built on a smarter, cleaner, regenerative future; including:

- Maintaining a strong distribution of employment land around Greater Adelaide;
- Not enabling significant loss of employment lands for the purposes of infill development, this is discussed further below;
- Sufficient supply of housing that is affordable for the workers required to deliver economic growth, particularly in growth industries; and
- Ensuring a healthy mix of land uses in every neighbourhood.

UFX is pleased to see consideration given to well distributed employment lands throughout the Greater Adelaide region.

UFX notes the inclusion of "Local Learning Opportunities" as one of the *Living Locally* Principles. UFX believes that present work in this area is relatively successful. In an infill context, the continuing ageing of Greater Adelaide's population will mean that while population increases will increase demand for educational institutions, this will be balanced by a lower proportion of the population being of school age. Nonetheless, robust demand forecasting in both infill and greenfields areas will be crucial to achieving this principle.

How and where should Greater Adelaide grow?

To positively advance the discussion on how Greater Adelaide should grow, UFX drew upon key themes from State Planning Policies, the GARP Discussion Paper (including the *Living Locally* principles), and general principles of sound strategic planning, and developed a list of simplified growth prioritisation objectives.

UFX then assessed key growth types against these growth prioritisation objectives, which ultimately delivered a ranked priority for each growth type. The higher the ranking, the higher the priority and the lower the ranking, the lower the priority.

UFX notes that not all growth can be accommodated in the highest ranking growth types and that growth will likely need to be pursued through most, if not potentially all growth types in some form or shape. Whilst Adelaide City Centre is the highest priority, it would be impossible for the Adelaide City Centre to accommodate all of the region's projected growth- nor would this likely deliver the kind of equality and diversity in housing choice that is required.

Growth, based on ranking and size of growth type area, is most likely to be accommodated via master planned infill development, urban corridor development, regenerated neighbourhoods and urban activity centres and general infill. There will be some circumstances where satellite and general greenfield development is suitable, these are discussed further below.

Assessment of how and where Greater Adelaide should grow

Development type's contribution to Growth Prioritisation objectives				
High	Med-High	Medium	Low-Med	Low

	Infill					Greenfield	
Growth Prioritisation Objectives	**City Centre**	**Master planned**	**Corridor**	**Regen**	**Small-scale**	**Satellite City**	**General**
Greater number of affordable housing outcomes	3	4	4	4	2	4	4
Greater housing type diversity to accommodate all stages and choices in life	2		3	4	3	2	2
Greater utilisation of existing services and infrastructure to reduce emissions and costs (capex and opex)		4		4	3	2	
Greater accessibility, including reduced travel times to employment areas, services and other needs		4	4	3	3	2	
Greater public transport use to reduce emissions and transport costs and improve public transport services	4	4		3	3		
Greater cycling and walking to improve health and wellbeing and reduce emissions and transport costs		4	4	3	3	2	
Greater access to high quality public and private open space to improve health and wellbeing		4		3	2		
Greater greening to mitigate effects of climate change and cool the environment	4		2	3		2	2
Greater protection of employment and production/productive areas		2	4			2	2
Greater population intensity to help drive new and diverse experiences, enterprises and economic growth		4	4	3	2	2	
RANK	**1**	**2**	**3**	**4**	**5**	**6**	**7**

Note: Objectives were equally weighted

Growth priority 1: Adelaide City Centre

- The Adelaide city centre is an important contributor to infill growth. It is the heart of our State's civic, cultural and commercial life and more people should be living, working, and visiting the Adelaide City Centre.
- The city centre should be the highest priority for future growth because of significantly high alignment with growth prioritisation objectives.
- Whilst the city centre should be prioritised, it will likely be a smaller contributor to accommodating future growth.
- UFX would like to see the Commision work closely with the City of Adelaide to maximise growth potential in the Adelaide City Centre and considers the development of the new City Plan as an excellent opportunity to pursue this further.

Growth priority 2: Master planned infill projects

- Developing larger strategic infill sites, particularly in the inner and middle ring areas through master planned approaches, enables better planning and delivery of more:
    - diverse and affordable housing;
    - potential for multi use developments
    - greening and open space;
    - effective stormwater solutions; and
    - access and mobility options.

- Master planned infill projects should be prioritised for future growth because development is highly aligned to growth prioritisation objectives.
- UFX considers the next generation of master planned infill sites will continue to emerge, particularly in the inner-middle ring western, southern and northern suburbs, as employment lands are self rationalised over time. Next generation sites can also be created through increased site amalgamation, potentially encouraged by incentive policies and other tools.
- Whilst master planned infill should be prioritised, it will likely be a smaller contributor to accommodating future growth.

Growth priority 3: Urban Corridor Development

- Urban corridor development enables more homes to be located near high-frequency public transport, which offers more choice in how to move around. It also provides more affordable and diverse housing choices near existing jobs and services in inner and middle ring suburbs.
- Urban Corridor Development should be prioritised for future growth because development is highly aligned to growth prioritisation objectives.
- UFX is supportive of two types of corridor development:

    - Lower scale next to established residential land uses
    - High scale where there are fewer sensitive interface issues

- UFX is generally supportive of proposed areas of investigation - but also believes the Commission should explore parts of corridors that are perpendicular to those corridors identified. To name a couple of quick examples, in Adelaide's west, the following corridors and corridor sections might also be suitable for lower scale urban corridor development.

    - David Tce near the Kilkenny Train Station and Arndale
    - Findon Road in Findon
    - Crittenden Road in Findon

- UFX believes all areas where there is a 15 minute go zone should be added to the urban corridor development investigation areas.
- UFX believes sections along greenways, for example along the River Torrens Linear Park, should also be added to urban corridor development investigation areas.
- UFX believes that there is an important opportunity to also align corridors to railway corridors, as well as road corridors, as these also provide high quality public transport links that are aligned to strategic priorities. These will not necessarily be high-rise in nature, given the higher propensity for interfaces with established neighbourhoods, but can be of a higher density, providing greater housing diversity.
- Some of the identified potential corridors present a low level of public realm amenity. Any attempt to create an urban corridor in such areas must be accompanied by strong and well-coordinated efforts to improve the quality of the public realm, and ensure that these corridors are desirable places to live, walkable outcomes along the corridor would encourage this and further support the development through improved access to existing and future amenities along the corridor.
- UFX believes urban corridor development is an important and potentially significant contributor to accommodating future growth and investigations of this type should be expanded and maximised,
- UFX also believes further exploration can be done on other housing typologies along corridors that would better support living locally outcomes as the emerging perpendicular apartment blocks which dominate this sector do little in encouraging social interaction and wellbeing.

Growth priority 4: Regenerated neighbourhoods and urban activity centres

- Regenerated neighbourhoods and urban activity centre development can provide more diverse and affordable housing options, utilise existing infrastructure investment and services (e.g. public transport, recreation, education, and medical facilities) and in some locations, provide access to a wide variety of retail and services.
- Regenerated neighbourhoods and urban activity centres should be prioritised for future growth because development is well aligned to growth prioritisation objectives.
- UFX is supportive of proposed areas for investigation but adds that investigation areas, particularly around major activity centres, could be expanded even further. This approach would support the pursuit of a more polycentric urban planning

approach, which would generate many strategic urban planning, mobility and access benefits across Greater Adelaide.

- Building on findings of the Adelaide City Plan, access to amenity encourages development, therefore strategic investment in amenity and accessibility would directly link to heightened development around urban activity centres. UFX therefore encourages significantly greater alignment between GARP and state and local government investment plans.
- UFX believes regenerated neighbourhoods and urban activity centres are an important and potentially significant contributor to accommodating future growth.

Growth priority 5: Small-scale infill

- Small-scale infill, such as the division of existing allotments into 2, 3, or 4 smaller allotments, makes a significant contribution to renewing the overall housing base and creating additional housing supply.
- UFX is supportive of small-scale infill, with the right design policies in place.
- UFX believes it is a relatively important and significant contributor to accommodating future growth as it leverages existing amenities and transport links and should continue to be supported in the future.

Growth priority 6: Satellite City

- A satellite city is a smaller city located on the fringe of a capital or major city. They are self-contained cities offering residents and surrounding districts a broad range of local jobs, services and amenities.
- Satellite city development should not be prioritised for significant future growth because development is not well aligned with growth prioritisation objectives. There are many issues in relation to many of the objectives, including low levels of existing infrastructure utilisation, accessibility, public transport, walking and cycling activity, etc.
- UFX believes it has a low level of importance and should only contribute to accommodating future growth if:
    - growth cannot be accommodated in higher priority areas or through higher priority development types; or
    - There are compelling economic reasons, such as supporting industry to grow in a particular location.

Growth priority 7: General Greenfield Development

- Greenfield development is the urban development of broad hectare land. It often occurs on farming land on the edge of established residential areas.
- General greenfield development should not be prioritised for significant future growth because development is not well aligned with growth prioritisation objectives. There are significant issues in relation to many of the objectives, including low levels of existing infrastructure utilisation, accessibility, public transport use, walking and cycling activity, population intensity and loss of employment lands, etc.

- UFX considers there may be some locations where Greenfield development could be prioritised. One example of this is around Kudla in Adelaide's North. This could provide opportunities for master planned communities with population and dwelling densities that would support walkable communities, including strong utilisation of existing infrastructure, namely the Gawler Rail line.
- As noted earlier in our submission, UFX believes that there are substantial issues with the other "spines" identified in the discussion paper, and is concerned that the cost of infrastructure required, and the lack of access by any means other than a car, would make them unviable.

Further Prioritisation

Within these priorities, UFX believes the following objectives should be utilised to assess how future growth can be accommodated.

- Resilience to the effects of climate change;
- Consideration of Aboriginal significance, and how this can be reflected within our planning system;
- Consideration of local urban design and interface issues;
- Minimising need for additional infrastructure investment; and
- Accessing existing open space - or appropriately introducing new open space.

Looking forward

Thank you for the opportunity to provide this submission.

UFX is looking forward to engaging further on development of the Greater Adelaide Regional Plan.

If you would like to discuss this submission in further detail or any other matter, please don't hesitate to contact UFX by email [redacted]

Ned Feary
Urban Future Exchange
https://ufx.org.au/

From: DTI:Plan SA
To: DTI:PlanSA Submissions
Subject: FW: Greater Adelaide Regional Plan Discussion Paper - WMRR submission
Date: Monday, 6 November 2023 4:55:07 PM
Attachments: image001.jpg
Greater Adelaide Regional Plan Discussion Paper - WMRR submission .pdf

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OFFICIAL

Hi Team,

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

Reference Number: 77028

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: Monday, November 6, 2023 4:40 PM
To: DTI:Plan SA <PlanSA@sa.gov.au>
Cc: [redacted]
Subject: Greater Adelaide Regional Plan Discussion Paper - WMRR submission

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

Dear Planning and Land Use Services,

The Waste Management and Resource Recovery Association of Australia (WMRR) appreciates the opportunity to provide feedback on the *Greater Adelaide Regional Plan Discussion Paper*.

Please do not hesitate to get in touch if you would like to further discuss WMRR's feedback. Thank you.

Warm regards,
Romany Maunder *(She/Her)*
Manager, Policy and Governance, and Secretariat
T [redacted]
M [redacted]
E [redacted]

Waste Management & Resource Recovery Association of Australia
Gadigal Country, Eora Nation | 57 St Johns Road | GLEBE NSW 2037 | www.wmrr.asn.au
The national peak body for the waste and resource recovery industry

Mr David Reynolds
Chief Executive
Department for Trade and Investment SA
250 Victoria Square/ Tarntanyangga
Adelaide South Australia 5000

Email: PlanSA@sa.gov.au

6 November 2023

Dear Mr Reynolds

Re: Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to provide feedback on the *Greater Adelaide Regional Plan Discussion Paper*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's $15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. WMRR's members are involved in the breadth and depth of waste management and resource recovery, engaging in significant activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residuals and problematic wastes.

An integrated WARR system is good for both the environment and the economy, given that it drives jobs and economic growth. At present in South Australia (SA), WARR activity directly and indirectly employs around 5,000 people with an annual turnover of greater than $1 billion and contributes around $0.5 billion to Gross State Product.[1][2] SA also leads the nation in its levels of resource recovery, with a rate of 81.9% reported for 2021-22. With almost four (4) million tonnes of materials recovered from households, businesses and construction activity processed locally through SA facilities resulting in a reduction of greenhouse gas emissions by 1.31 million tonnes of CO2-e.[3]

The built environment will be integral to SA's transition to a circular economy. A circular economy recognises the true value of resources and materials and aims to keep products and materials at their highest value for as long as possible to reduce the amount of virgin material that is needed. It incorporates aspects like original product design, sharing, repair, re-use and, only after these higher value steps, recycling, and resource recovery. By keeping these materials circulating, there is the additional benefit of reduced reliance on virgin materials (which can be accompanied by land clearing

[1] South Australia's Waste and Resource Recovery Infrastructure Plan, Green Industries SA 2018
[2] South Australia's Waste Strategy 2020-2025, Green Industries SA 2020
[3] Green Industries SA, Circular Economy Resource Recovery Report 2021-22.

and loss of biodiversity), as well as reducing carbon and methane emissions, which will be key to also meeting 2030 carbon commitments of 43% reduction on 2005 levels.

The Greater Adelaide Region Plan needs to include clear recognition that with the proposed population growth and increase in urban areas there will be an accompanying increase in waste material, including hazardous wastes, which have no potential for beneficial reuse, and that the well-planned provision of suitably located facilities for the collection, aggregation, processing, treatment and disposal of such wastes is essential for both the environment and the continued operation of industry. The development of such facilities requires appropriate planning (land use and transportation) as well as buffers, given that there can be high levels of sensitivity to encroachment. In WMRR's view, the Plan urgently needs to recognise that the WARR industry provides essential services to the community, in the same manner as other forms of infrastructure are referenced.

The criticality of the WARR sector has been tragically highlighted by natural disasters and the pandemic in recent years. These have resulted in the creation of large volumes of waste needing removal and differing disposal treatments at scale. Strategic planning that includes the recognition of both business-as-usual growth as well as these types of surges needs to occur, to ensure there is resilience across WARR networks and help protect the accessibility and useability of infrastructure. It is vital that the SA Waste and Resource Recovery Infrastructure Plan and the Waste Strategy be incorporated into this plan and echo connected sentiments, given the vital role that this Plan plays in establishing and supporting the continued growth of Greater Adelaide to ensure that it does remain a liveable city.

The importance of waste and recycling services and the need to consider this in initial design and strategic planning is too important to leave to the goodwill or ad hoc approach of individual developers, councils and projects. It requires a systems level approach to be effective and safeguard the minimum standards the WARR industry needs to deliver its services to the Greater Adelaide community.

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

[redacted]

Gayle Sloan
Chief Executive Officer
Waste Management and Resource Recovery Association of Australia

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

(02) 8746 5000
INFO@WMRR.ASN.AU

ABN 78 071 897 848

WMRR.ASN.AU

Annexure A

Submission:

What do you think of the four (4) outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider? What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?	Adelaide has a terrific opportunity to ensure that it remains a liveable city to live, work, play and stay, by focusing on its natural environment and continuing to build on its strong planning foundations including land use and considered transport networks. An increased emphasis on reducing carbon emissions by preferencing local recycled materials, managing materials close to generation (the proximity principle) and planning resource recovery precincts to keep material out of landfill and reduce native vegetation clearing (also reducing methane emissions). All of the above can be assisted by a clear and specific definition of what the circular economy is, why achieving a greater level of circularity is critically important and how planning and development processes and outcomes play a key role in achieving circularity need to be incorporated into the plan. WARR infrastructure like power, water, sewer and social infrastructure needs to be planned for at the outset with our spatial footprint located throughout the region that it serves. It is not appropriate to 'push the industry out' (proximity principle), into the regions without adverse commercial and carbon impacts. Further by doing so, it negates the opportunity to create resource recovery/ recycling hubs that enable the creation of secondary material to use in local manufacturing and create local SA jobs.
What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?	As well as the elements mentioned above (e.g. the use of recyclate in the built environment, reducing land clearing and reliance on virgin material as well as carbon and methane emissions), the plan should recognise the relationship between design and construction of built form to future generation of waste and the role that the built environment sector can play in reducing the future generation of waste, amount of embodied energy and carbon emissions. The plan could promote design requirements that drive the prioritised use of recovered materials in buildings and infrastructure as well as future reusability and recoverability. Recovered materials need markets for their use in a circular economy while design and material choices determine the

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

(02) 8746 5000
INFO@WMRR.ASN.AU

ABN 78 071 897 848

WMRR.ASN.AU

	flexibility of buildings for greater longevity and the ability for their components to be recovered at end of life.
What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?	The Plan could be a blueprint for equitable and consistent management of WARR material by clearly identifying at a strategic level the land use precincts where WARR facilities could be developed that service the Region equally, and also by establishing clear planning guidance as to the standards required to be complied with statewide, for all built environments and roads/ streets to gain equal access to collection services. This would support collection logistics through building and transport network design requirements. Subdivision design, road widths and traffic flows need to support the ready movement of waste and resource recovery trucks – both for standard households and once aggregated for long-haul transport to key large scale facilities. The availability of adequate space in buildings for the separation and storage of materials is critical to enabling the sustainable management of waste and resources. The plan could improve policy support with specific reference to 'living' documents for good design outcomes to support waste and resource recovery outcomes. Specific policy for other forms of development, such as residential, retail, office, medical/consulting room, education and community uses should be referenced in strategic and statutory policy but could exist in standalone policy documents which can be updated outside of Strategic Planning and Code Amendment process.
What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?	Establishment of suitable zoning to support more resource recovery and circular economy hubs. There are significant employment and economic benefits from co-locating different WARR infrastructure together (as occurs in the Wingfield precinct for example) and this could be further driven with planning for circular economy hubs, where manufacturers who can reuse materials or use recycled materials, are supported to co-locate given that the recovered materials will act as inputs into their processes.
What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?	Initial planning and design must consider resource consumption in both the physical design of buildings and public infrastructure and the materials they consume but also the day-to-day life of communities and the choices they make. Aspects like encouraging public and active transportation, easy access to community facilities like repair cafes, share libraries,

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

(02) 8746 5000
INFO@WMRR.ASN.AU

	salvage shops and recycling facilities (container deposit scheme drop-offs, hazardous household waste disposal points etc.) are needed to maximise the use of resources, but they also foster community connectiveness and capacity building- essential elements to building strong communities.
What neighbourhood features enhance living and working locally?	Current strategic and statutory policy positioning offers no material support for development which facilitates reduced consumption/ reuse or recycling. At present policy relating to residential development is typically focussed on the direct logistics of waste collection but offers little policy support for outcomes which reduce waste generation in the first place. The built environment has enormous amounts of embedded materials and energy. The current system of demolition and downgrading materials takes additional energy and loses much of the embedded value in those materials. Retaining the value of these materials in their current form can be encouraged through modular design and building techniques that allow for de-construction and reuse. De-construction will also allow items that cannot be reused to be separated more easily so they can be recovered into higher grade products (instead of mixed materials).
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?	It is vital that infill development maintains character and amenity, and where possible can be done with minimum disruption, yet meet the requirements of liveability including open space, energy efficiency and climate considerations. Ideally vertical development can be used that will enable green space and tree canopy to be maintained, as well as an increased emphasis on using recycled material and ensuring that appropriate WARR collection infrastructure can be both enhanced and serviced. WMRR seeks that guidance materials produced for Green Industries SA, such as the Better Practice Guide for Waste Management in Residential & Mixed Use Developments (2014), be utilised.
Where is the next generation of strategic infill sites?	Ideally the next generation of infill sites will be located adjacent to existing transport and community infrastructure (referenced as established urban area) to avoid further sprawl and the need for further large infrastructure investment. As such, WARR infrastructure needs to be located where it can continue to efficiently service its community and enable further investment.

	To this end, existing facilities need to be appropriately protected from encroachment by future development, particularly the creation of additional sensitive receivers, to avoid interface issues arising. This needs to include maintenance of the separation distances recommended by the EPA through zoning to prevent environmental interface issues (such as noise, dust, traffic or odour) arising due to land use changes. Planning needs to establish suitable locations for new infrastructure, including those which generate impacts to be located, convenient to the communities they serve and their logistic pathways. As Adelaide grows, there will be a need for new transfer stations and resource recovery facilities to ensure that communities have access to efficient and accessible waste and resource recovery services.
What are the most important factors for the Commission to consider in meeting future demand for employment land?	Affordable housing to ensure that these precincts have a pool of workers that can access the employment land.

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

(02) 8746 5000
INFO@WMRR.ASN.AU

ABN 78 071 897 848

WMRR.ASN.AU

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:24:21 PM
Attachments: GARP_Water Sensitive SA submission - 6Nov23.pdf

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Dear Mr Holden,

Thank you for the opportunity to provide a submission on the Greater Adelaide Regional Plan Discussion Paper.

Water Sensitive SA supports government, industry and community to mainstream water sensitive urban design and integrated water management practices that enhance wellbeing and ecological health.

Please find attached our detailed feedback for your consideration.

Kind regards,
Belinda

Belinda Dohring | Program Manager
Water Sensitive SA | PO Box 351, Uraidla SA 5142
[redacted]
www.watersensitivesa.com

WATER SENSITIVE SA

6 November 2023

Mr Craig Holden
Chair
SA Planning Commission
plansasubmission@sa.gov.au

Dear Mr Holden

Greater Adelaide Regional Plan Discussion Paper

Water Sensitive SA welcomes the opportunity to contribute to a new regional plan for Greater Adelaide. We reinforce the importance of sustainable, diversified and fit-for-purpose water resources through integrated water management and water sensitive urban design (WSUD) to support a liveable and thriving urban environment in the face of a changing climate.

The following key points are critical for the Greater Adelaide Regional Plan to achieve the primary object of the Planning, Development and Infrastructure Act, which is to support the state's liveability and prosperity in ways that are ecologically sustainable (PDI Act s12(1)):

1. **Consistency with the pending Resilient Water Futures Urban Water Strategy** – urban water services and growth (infill and greenfield) must be strategically aligned.
2. **Sufficient space allocated for stormwater treatment and harvesting** – structure plans and master planned communities must be designed with enough space to protect and regenerate urban ecosystems.
3. **Protection of waterways and existing drainage lines** – encroachment must be minimised to allow expanded urban greening, recreational activities and natural systems so that multi-beneficial outcomes are delivered for communities.
4. **WSUD is an opportunity to adapt to climate change** – resilience of natural systems in a warmer, drier future climate will mitigate health and economic impacts.

The four points above are fundamental to achieving the outcomes of the Greater Adelaide Regional Plan and more specifically, these State Planning Policies:

- A greener, wilder climate resilient region
  - SPP1 – Integrated planning
  - SPP4 – Biodiversity
  - SPP5 – Climate change
  - SPP12 – Energy
  - SPP13 – Coastal environments
  - SPP14 – Water security and quality
  - SPP15 – Natural hazards
- A more equitable and socially cohesive place
  - SPP7 – Cultural heritage
- A strong economy built on a smarter, cleaner, regenerative future
  - SPP5 – Climate change

Water Sensitive SA
PO Box 351
Uraidla SA 5142

admin@watersensitivesa.com
watersensitivesa.com

LIVEABLE WATER SENSITIVE COMMUNITIES.

Strategy and planning policy that regards stormwater as an asset to urban communities and integrates sustainable water management should be widely promoted in the new Greater Adelaide Regional Plan. Without this, we risk missing vital opportunities to expand urban green cover, achieving liveability and affordability, and supporting the community's disaster preparedness. Future generations must be protected from decisions made today that burden them with the socio-economic and environmental impacts that can be avoided by good strategy and policy planning.

Adopting Water Sensitive SA's four key points above and strengthening them within the Greater Adelaide Regional Plan will deliver maximum benefit for communities through creation of linear open-space corridors adjacent waterways for recreation, increasing biodiversity, and protecting downstream catchment environs from flooding, pollution and environmental degradation. Together these key points further reinforce climate change adaptation measures to address impacts such as urban heat island effects.

Strategic urban water resource planning and investment must be central to the Greater Adelaide Regional Plan to ensure Adelaide maintains its renowned status as a liveable and healthy city.

If you require any clarification of the comments provided as part of this submission, please contact the Program Manager, Belinda Dohring, [redacted]

Yours sincerely

[redacted]

Dr Sheryn Pitman
Chair
Water Sensitive SA Steering Committee

WATER SENSITIVE SA

Greater Adelaide Regional Plan

Water Sensitive SA submission 6 November 2023

Part 1. How should Greater Adelaide Grow?

A greener, wilder and climate resilient region

Priorities and directions

SPP1 – Integrated Planning (ref. page 54)

General comment: An active urban form will necessitate cooler, shadier streets and public spaces to attract people outdoors, particularly in hotter, drier conditions. Water sensitive urban design (WSUD) is one way to ensure sustainable water supplies support greening for high-quality amenity in neighbourhoods and at local parks.

Issues for consideration:

- Existing open space networks need to support a diversity of values including passive transport corridors, recreation, amenity, biodiversity and stormwater conveyance.
- Capitalising growth near these networks will add pressure to existing assets.

Recommendation:

1. Ensure WSUD is one of the criteria in the benchmark assessment for walkable communities.
2. Expand open space networks in growth areas and ensure investment in the quality of these spaces supports increased use due to urban growth.

SPP4 – Biodiversity (ref. page 55)

General comment: Existing water courses and riparian zones support diverse habitat and ecosystems, often being the only remaining corridor of connected natural landscape in the Greater Adelaide metropolitan area. Greenbelts will become vital to the capability of biodiversity to adapt to climate change as the urban form changes.

Issues for consideration:

- New urban development should seek to maintain, or create, new biodiversity corridors to link existing open space through the built form design. This could be achieved using surface-level WSUD and open stormwater drainage channels within divisions (rather than traditional underground pipe networks) to establish constructed linear parks.
- Bringing water to the surface will attract a more diverse range of flora and fauna.
- Climate change resilience and extreme hazard (bushfire/flood) protection can be enhanced by expanding biodiversity and watercourse buffer zones to prevent development encroachment.

Recommendations:

1. Additional idea for GARP – Establish an expanded network of linear parks along drainage lines and watercourses to support biodiversity adaptation and connectivity.

SPP5 – Climate Change (ref. page 55)

General comment: The impact of climate change on water resource sustainability is projected to result in a drier environment (particularly during spring) with more intense rainfall events.

Urban greening is a key climate adaptation response in Greater Adelaide, which also contributes to emissions mitigation. Recognising the role WSUD plays to underpin expanded urban tree canopy is strongly supported.

Issues for consideration:

- The resilience of urban trees will rely on access to climate independent, sustainable and diverse water resources that are integrated to enable agility in providing fit-for-purpose supplies. The extreme climate scenarios of El Nino and La Nina conditions (and projected changes to annual rainfall patterns) should be considered to ensure resilient urban greening.

Recommendations:

1. Expand the tree canopy criteria to consider tree resilience and access to fit-for-purpose water to ensure urban tree canopy performance assessment is more sophisticated than a map indicating the area of canopy coverage.

SPP 12 Energy (ref. page 56)

General comment: Energy is a key input of water production, distribution and wastewater recycling. Utilising at-source water supplies such as stormwater in street-scale WSUD features (tree inlets, raingardens, wetlands and swales) in urban development can support reduced energy demand for urban irrigation.

Issues for consideration: Water to cool the urban environment can help reduce energy demand and support climate equity in deploying adaptation strategies. Irrigated spaces, misting systems and open water bodies all offer alternative cool places rather than mechanical air conditioning.

Recommendations:

1. Additional idea for GARP – Seek to use at-source water supplies to reduce energy demands for the production and distribution of water resources for urban cooling.

SPP 13 Coastal Environment (ref. page 56)

General comment: Urban stormwater and treated wastewater discharged into coastal waters results in pollution of seagrass meadows and contributes to localised sand drift. Reducing the volume of discharge from these sources by capturing and harvesting stormwater and using recycled wastewater for irrigation will improve the health of coastal environments.

Issues for consideration: Expansion of recycled water infrastructure and harvested stormwater networks as part of integrated water supplies to be standard practice in future urban areas.

Recommendations:

1. Additional idea for GARP – Minimise the volume of water discharged into coastal environments by utilising it at-source, harvesting it or recovering it for other uses.

SPP 14 – Water Security & Quality (ref. page 56)

General comment: Urban development should be planned to ensure sustainable water supplies and urban water management contribute to the State Governments Resilient Water Futures strategy (under development, led by SA Water) as part of a holistic approach to becoming a water sensitive city.

Recommendation:

1. Additional idea for GARP – Ensure residential growth areas develop fit-for-purpose water resources, complementary to the Resilient Water Futures integrated water management plan for Greater Adelaide (under development).

SPP 15 – Natural Hazards (ref. page 56)

General comment: Urban flooding is correlated to the change in urban surface from permeable to impermeable. Minor events can be mitigated by enabling more infiltration of rainfall into soils, rather than directing run off to stormwater drainage systems, reducing flood risk during more intense rainfall events that are predicted due to climate change.

Issues to consider: Extreme rainfall events and La Nina conditions cannot be mitigated by increasing infrastructure capacity alone, as this may result in over-capitalisation of network investment and assets that are stranded during periods of unuse.

An integrated approach is required to ensure extreme stormwater events are mitigated at the lot, neighbourhood and catchment scale, and space is available within the urban form to attenuate water rather than accelerate it to coastal environments.

Recommendations:

1. Ensure hazard mapping and research data is readily available and shared for a common understanding of how to manage risks and ensure they are not simply transferred between water catchments or stormwater drainage networks.

A more equitable and socially cohesive place

Priorities and directions

SPP7 – Cultural Heritage (ref. page 63)

General comment: Recognising and protecting cultural heritage through better engagement with Aboriginal peoples and identification of sites and areas of significance is strongly supported.

Issues to consider: It must be recognised that the protection of cultural heritage is strongly connected with our ability to deliver integrated design solutions that protect drainage lines and waterways from encroachment of development, and hence provide opportunity for natural systems within our urban landscape.

A strong economy built on a smarter, cleaner, regenerative future

Regenerative planning (ref. page 69)

Restoration of creek lines and biodiversity corridors, WSUD for resilient urban greening and biodiversity, and rezoning degraded industrial sites are examples of regenerative practices.

This initiative is strongly supported as it is essential for the liveability of our communities. However, achieving this policy is contrary to the existing rate of urban development infill and the continually increasing impervious nature of the city. This goal will remain extremely challenging to deliver without a significant shift in the way we develop.

The total volume and rate of stormwater runoff from our urban landscape (infill and greenfield areas) is damaging the sustainability of urban waterways, and hence their ability to deliver the environmental benefit and amenity envisaged by the GARP.

Greater efforts must be made to ensure:

1. During the GARP process:
   - Future planning of land dedicated to stormwater treatment via wetlands, swales etc. must facilitate increased stormwater harvesting.
2. In the Planning and Design Code:

- Source control of stormwater via rainwater tanks (plumbed indoors in order of priority: Hot water service, laundry cold tap, toilets), infiltration systems on private property (if appropriate offsets from structures can be achieved) and within the road verge.
- Increase perviousness of driveways and carparks. A detention-only response to stormwater for commercial carparks is no longer acceptable practice.

SPP 5 – Climate Change (ref. page 70)

General comment: The CRC for Water Sensitive Cities 2017-2022 developed research, skills and technologies that have been exported globally to support economic growth and sustainability in regions where water resource planning is paramount.

Issues to consider: Integrated green and blue technologies support economic growth and resilience as the climate changes. Water resources are also a key consideration in energy, waste and transportation planning and development to mitigate climate risks.

Recommendation:

1. Additional idea for GARP – Identify opportunities for integrated water management (closed-loop systems) to support future growth.

SPP6 – Housing Supply and Diversity (ref. page 71)

General comment: The CRC for Water Sensitive Cities authored-report, *Planning for water sensitive infill development: case study Salisbury East precinct*.

Issues for consideration: A study of the City of Salisbury demonstrates how a range of infill typologies, coupled with precinct and streetscape WSUD can achieve density AND environmental outcomes to support housing diversity goals.

Recommendation

1. Include City of Salisbury in the defined locations where regeneration and strategic opportunities can be identified.

A greater choice of housing in the right places

Priorities and direction

SPP6 – Housing Supply and Diversity (ref. page 79)

General comment: Quality research is readily available that demonstrates increased housing diversity can achieve greater onsite private open space and stormwater management.

Issues to consider*:* Refer to *CRC for Water Sensitive Cities Infill typologies catalogue* for a suite of infill designs at a range of scales that facilitate greater provision of private green space and improved stormwater management.

The urban form to bring our vision to life

Strategies and tools that could encourage Living Locally (ref. page 91)

Recommendation:

1. Recognise the contribution waterways and drainage lines (specifically open channels) can make to expanding the network of open spaces.

Infrastructure and services

Trunk and non-trunk infrastructure (ref. page 94)

Given the substantial cost of trunk infrastructure, areas identified for short to medium term growth will look to maximise existing infrastructure. This can be more cost effective and less disruptive to the community than building new infrastructure.

General comment: This may be true to some extent, however it results in intergenerational cost shifting and transferring risk between stormwater catchments where asset infrastructure is not capable of responding effectively in changed climatic conditions.

Many existing stormwater drainage systems within infill suburbs no longer perform at their design function, e.g. typically the underground (minor) drainage system should contain the 1 in 5-year average recurrence interval (ARI) (18.1% annual excessive probability – AEP) design storm, without reaching capacity when floodwater spills over roadways. Systems such as the Fredrick Street catchment within the Cities of Marion and Holdfast Bay will experience inundations of the road network more frequently (1 in 2-year ARI or 50% AEP). This means in any given year the design storm has a 50% chance of inundating the road network, exacerbating traffic and safety issues.

A WSUD design approach at the allotment scale (rainwater harvesting and plumbed for indoor use, infiltration systems and permeable surfaces) and local neighbourhood street-scale WSUD can extend the life of existing drainage networks considerably by attenuating or reducing discharge to drainage networks. The Planning and Design Code must facilitate a multi-beneficial approach to maximise investment in trunk infrastructure.

Part 2. Where should Greater Adelaide grow?

The Commission's Principles for Identifying Land for Housing and Jobs

The 7 principles (ref. page 101)

5. The encroachment of urban areas on places of high primary production, landscape or environmental significance should be avoided.

General comment: Preservation of waterways AND drainage lines is critical. Local government now understands that former practices of burying natural drainage lines and creeks is inadequate stormwater management and this outdated approach has failed to manage water resources sustainably. The Pasadena Biodiversity Recreation Trail at the City of Mitcham is an example of how councils are now reimagining established suburbs by bringing stormwater to the surface, effectively "daylighting" a creek that was formerly buried. This project has provided greater connection to nature for the community and significantly enhanced the amenity and biodiversity of the area by converting one of three 900mm stormwater pipes into a natural system via a series of vegetated basins and swales to reintegrate the water back into local soils via infiltration trenches to support tree health, building resilience in the urban landscape.

The City of Adelaide is also working to rehabilitate Botanic Creek in the eastern Park Lands, recognising the benefit of quality watercourses in open spaces.

Greenfield and satellite city growth (ref. page 111 & 112)

General comment: It is agreed that master planned communities represent the best opportunity to incorporate waterways/stormwater management and green infrastructure into new communities.

Issues to consider: It is critical for planning documents to outline the requirements for WSUD as part of new communities, to include mandatory measurable performance targets for incorporation of stormwater treatment, flood protection, green infrastructure and water reuse systems. This should be emphasised in the text as a requirement of future urban planning.

Eastern spine

Why this area (ref. page 123)

This area was identified as an investigation area for future residential/employment activities because

- *The typography of the land does not present significant challenges*

General comment: While this may be true for Murray Bridge, the Mount Barker topography is substantially more challenging, with defined drainage lines and watercourses with steep grades that must be protected from urbanisation. Greater emphasis should be placed on integrated WSUD design approaches incorporating treatment, biodiversity and recreation as part of master planning to mitigate degradation of local water courses (rather than basic detention alone). Failure to include WSUD assets will place substantial burden on the high environmental values of these areas, leading to degraded streams.

Further, construction phase sediment management is a major challenge in the Mount Barker area due to the slope of the land coupled with the high rainfall area. Industry and local government need greater support from state government in the management of this significant risk to the environment.

In a related policy matter, Council development plan sediment control policies were removed from planning policy in the conversion to the Planning and Design Code and need to be reinstated with current best practice sediment management policy as a matter of priority.

The Greater Adelaide Regional Plan Discussion Paper

General comment: Water Sensitive SA is supportive of a Regional Plan for Greater Adelaide that recognises the substantial role water plays in maintaining and enhancing a thriving and sustainable city.

DTI:PlanSA Submissions

From: Marty Cielens <[redacted]>
Sent: Thursday, 2 November 2023 4:20 PM
To: DTI:PlanSA Submissions
Subject: Western Adelaide Coastal Residents' Association submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: WACRA Submission on the Greater Adelaide Regional Plan - 4 Nov 2023.pdf

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

I am please to submit a response to the Greater Adelaide Regional Plan discussion paper on behalf of the Western Adelaide Coastal residents' Association

Marty Cielens

Chair
Western Adelaide Coastal Residents' Association
[redacted]

A WESTERN ROADMAP

WACRA submission on the Greater Adelaide Regional Plan Discussion Paper

4 November 2023

New Operating System Upgrade - GARP

We are heartened to read that the Greater Adelaide Regional Plan (GARP) will replace the current 30-Year Plan for Greater Adelaide. This plan has not aged well, causing harm and heartache. It is very timely to refocus strategically on what can be learned from the experiment and use those findings to inform this new plan.

WACRA endorses the outcomes as proposed in the GARP. In the past, growth was seen as the panacea that would overcome all problems. We now realise that untrammelled growth also leads to undesirable outcomes for our community.

The goals of our residents' association are very similar to these four outcomes built into this Greater Adelaide Regional Plan. The key will be how to implement these and keep them in balance as the pressures of population growth, climate change, technological change and other unknown factors stress the plan.

The Dynamic Adelaide West Region

The west is going to benefit from the massive infrastructure spend on the north-south corridor revamp of South Road which will bring increased growth and industry to our doorstep.

The other huge spend is the Federal Government's defence policy, concentrated on the AUKUS nuclear submarines and upgrades of other naval and air defences which will, if it goes ahead, will boost employment from trade workers to scientists and project managers. As with the previous Collins submarines, opportunities in the nearby west benefit sub-contractors in all areas of defence procurement.

There is still great uncertainty about this project, financially, politically and strategically. Given the attention our current state government is making on creating a green hydrogen plant. What about skipping the submarines and creating industries for the future – e-vehicles, e-buses, e-trains, white goods and solar panels? We have the land and industrial scope. Our current Premier could be the champion of a multi-armed green industry economy, just as Premier Thomas Playford championed manufacturing industries that provided the state economic growth.

The west is growing at 10 per cent per annum, attracting the lion's share of new migrants who come to Adelaide. This new energy, new drive and ambition will be crucial to a thriving region in the west. We lack a university campus to underpin the crucial skills development programs for the future. Would the GARP framework encourage allocation of assets, such as university campuses across the geographical spread of Adelaide to encourage educational mobility?

Unintended Consequences of Narrow Project-based Planning

The success of the new GARP will be a widening of planning perspectives to achieve its four interlinked outcomes. Every project should be tested against these four outcomes to ensure that progress in one place does not create problems elsewhere. We have a recent local case study in Henley Beach that illustrates how easily this can happen with a narrow project-based perspective.

Main Street Redevelopment created a new pedestrian and entertainment precinct in what was an underused road opposite Henley Square. As part of improving Main Street, the project undertook major traffic calming of the cross street, Military Road which now has new roundabouts with wide pedestrian crossings, raised calming devices, new pedestrian paths and landscaping.

In terms of urban beautification, it is a success, with traffic calming prioritising pedestrians, access and safety over the previous use of Military Road as a north-south feeder road between Henley Beach and Grange Roads.

The unintended consequence, however, is that traffic that previously used Military Road now diverts to Seaview Road, a normal suburban width street. This now takes all of the vehicles that previously used Military Road. Pedestrians using the wide, safe crossovers to get over Military Road are marooned trying to cross Seaview Road on the way to the beach. On warm weekend days, the road is bumper to bumper with traffic from Grange and Henley Beach Roads heading to the Square and there have been several accidents on the street, a recent one fatal.

In the GARP planning framework, would this be seen as a successful outcome? It is a small example of how any development needs to model consequences across a range of linked systems. No change is simple in today's world. With the help of AI tools and a strong visionary master-planning, disruptions from change can be predicted and resolved at the planning stage.

Big Ideas Needed for an Uncertain Future

From a local issue to a big-picture idea. Recent announcements about moving 800 ADF personnel from the Edinburgh airstrip opens the door for a second, perhaps major airport in Adelaide. The sea level rise maps show Adelaide Airport could be flooded by the end of the century. Because of air strikes with birds, the airport management are loathe to plant trees. If Edinburgh became Adelaide's main airport, imagine the current airport land converted to urban forest, a new Reedbeds, as development of all kinds moves north. Does the GARP leave space for big picture ideas like this?

Can we sustain the present level of growth knowing the impact of climate change coming? How can this plan help encourage people to design and build houses that live more gently on the earth? Swimming pools will be a luxury full of precious water. Large homes with no gardens will be hot boxes.

Present plans are very focused on development for economic and capital growth without placing priorities on how all living things will live sustainably, given the extreme changes coming. More resources in education of our citizens will be needed to help make a smoother transition to our new world in our natural and built environments. [1]

[1] Priorities for a Strong Community - City of Charles Sturt Community Plan 2023 http://wacra.org.au/new/wp-content/uploads/2023/10/WACRA-Community-Plan-submission-2_9_23.pdf

GARP OUTCOME: A greener, wilder and climate resilient environment

SPP1 – INTEGRATED PLANNING

We support a planning system that can enable a more walkable urban form, better access to public transport and support for low emission transport technology. Adelaide residents have shown themselves to be resistant to all such initiatives in the past, preferring their private fossil fuelled cars. This plan will promote positive changes.

Support Strategic Infill
WACRA endorses identifying major corridors for strategic infill, rather than the urban infill model in the existing 30-Year Plan code which has caused many problems. There have been examples of successful strategic infill in Bowden-Brompton, Dock One and Port Approach (South), North West and Fletcher's Slip and West in West Lakes. There are several medium size strategic western infill sites in planning such the Rowells Road wholesale grocery site in Underdale and the SA Water waste treatment plant in West Lakes.

Transit-oriented developments in large clusters could be planned all along the Grange/Outer Harbour train lines in addition to the above key building projects that will establish new supplies of homes while promoting sustainable urban growth.

Identifying these strategic infill sites is key, as is how to manage the growing population's, transport needs in a city that was not designed to carry this growing load on its roads.

Imaginative Public Transport Initiatives
We are fortunate in the west to have the City to Glenelg tramline, the Outer Harbour and Grange train lines and extensive public bus services which now run on 15-minute schedules during the day on major feeder roads to the city. DDA upgrades of bus stops continue, making this an affordable and equitable means of transport for everyone.

The buses are, however, under-used. Sydney is exploring using new technology to alert intersection lights ahead when a bus is coming and automatically prioritise the bus, making for a faster commute. The potential to use this technology exists in our traffic light network. It just needs to be implemented. Ideally, western train infrastructure needs to be electrified, but given ballooning construction costs of new rail, rapid bus routes are a medium-term option.

Revise Code Amendments for Private Vehicle Parking
Even if the future will be electric vehicles, Australians have a definite preference for larger, fossil fuelled cars. Current codes for parking bays need to be revised to accommodate the significant increase in these longer and wider vehicles.

Given the Australian Bureau of Statistics' documented increase in 2-3 car households, the 30-Year Plan definitely needs to bite the bullet and call for two cars to be accommodated in new dwellings, to stop the crowding of narrow streets that has grown considerably since the current plan was adopted with its minimal requirements for car parking on private property.

Current driving times to and from the city on weekdays are getting to be almost equivalent to cycling times, with bumper-to-bumper traffic moving slowly through the crowded roads. This points to a need for a carpool/bus lane and single-occupant lane on two-lane feeder roads.

Government has the power to make change. The bus lanes in Currie/Grenfell Street faced a huge outcry. They have proved to be a very useful tool to move people much more efficiently through the city on public transport and have not greatly inconvenienced drivers.

We recommend more use of this type of leadership for feeder roads into Adelaide with the left lane reserved for buses/carpool (2 or more people) and the normal commuter traffic with a single driver occupant in the right-hand lane.

This would need to be enforced with cameras at intersections and other patrolling, but once adopted and accepted as best practice, could greatly increase people sharing car-rides into the city and using low-emission public transport.

Adopt Separated Cycleways

Greater innovation in cycling paths separated from traffic could see a greater adoption of this vital transport mode. At the moment, there are too many accidents and fatalities from unsympathetic motorists, accidental door opening and speed. We see a completely separated path as the only way to improve safety and widespread cycling adoption.

Innovative Thinking with New Transport Technologies

All options need to be considered, including light rail and innovations such as on-demand, microbility and block chain and distributed ledger technologies. The alternative is roads choked with private vehicles that are becoming bigger and more polluting.

SPP4 – BIODIVERSITY

WACRA fully supports increased biodiversity initiatives and targets. We call on this plan to look at blue carbon and green engineering as priorities for our climate-stressed future.

Dune Restoration

As a group that advocates for coastal residents, we also agree with the Discussion Paper's assessment that increasing sea levels, both day to day and in extreme events, is a near-term threat. We have been vocal and continue to be advocates for improved coast management and dune restoration. [2]

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[2] Submission to the Independent Panel - Adelaide Beach Management Review, October 2023. http://wacra.org.au/new/wp-content/uploads/2023/10/WACRA-submission-to-ABMR-IAP-151023.pdf

WACRA believes that thinking in terms of green engineering, such as restoring dunes using fencing to capture sand and holding sand down with plants is an effective coastal complementary approach on the metropolitan coast that could add protective natural buffers against increased tides and storms and provide much needed habitat along the Coast Park Path.

Seagrass Meadows Benefit Coasts and Climate

Seagrass meadows are vital to marine environments but little understood because they are underwater. A huge effort is needed to restore the 6,000 hectares of Adelaide's seagrass meadows lost due to the Glenelg sewage works and nutrient-rich stormwater run-offs. Local researchers know how to do this with sandbag drops in winter. These start new meadows which will establish within 8-10 years, add friction to seabed waves and work to slow destructive waves eroding the coast. They also are extremely effective carbon sinks once established.

The knowledge of how to rebuild these meadows for Adelaide conditions is there, but where is the government commitment to invest in protecting the coast through seagrass restoration? It is currently a small scientific endeavour aided by Seagrass for Snapper volunteers.

River Torrens/Karrawirra Parri Restoration

With the recent completion of the Breakout Creek/Purruna Parri wetlands at the end of Karrawirra Parri (River Torrens), there is an accessible public shared path from the east, through the city, to the river's outlet with established trees and new grass and shrub areas. The goal of the partners in this project is to have a river clean enough that native fish can thrive and key species such as rakali (native water rat) and platypus can enjoy the river again. It will significantly add to the ecological health of that region.

Given that Adelaide's west used to be the Reedbeds seasonal wetland until the drainage for the Adelaide Airport and housing, we welcome this new environmental feature with its planting that may see the return of some of the 50 or so bird species which have not been sighted there for more than 70 years because of environmental destruction. The early indications are that biodiversity will flourish due to this initiative.

Extend the Karrawirra Parri Greenbelt into Nearby West Beach and Airport Land

There are other areas of the old Reedbeds estate between the Patawalonga and the Port River estuary that could benefit from mass replanting and establishment of biodiversity corridors.

The GARP could build on the river's new environment and push these environmental benefits out to neighbouring unplanted land, including at West Beach and at the Airport, as a rich urban forest biodiversity mecca.

Biodiversity is the key to a healthy environment. This means we should look beyond just trees. They are a vital but only one link in a web that includes many other fauna-friendly ecosystems.

SPP5 – CLIMATE CHANGE

WACRA supports all the initiatives proposed, particularly mapping the tree canopy. It is our hope that if the suburban infill that now is decimating trees is replaced by strategic infill coupled with tree planting along corridors, this will make some difference to attaining already difficult targets. Here is a link to our submission to SA Parliamentary Inquiry into Urban Forests.

Urban Forest Essential for Health and Wellbeing

WACRA has consistently called for greater resource allocation, planning and implementation of an Urban Forest strategy for Adelaide. [3]

Green will be our friend as we come to a drastically changing climate. Many problems with establishing an Adelaide urban forest stem from the existing Planning and Design Code. Tree canopy has gone backwards since it came into being.

We need to tighten the current Planning and Design Code's lax tree removal provision and consider much stronger mandates, such as Brisbane's requirement for 15 per cent of each property to have Deep Soil planting. And perhaps, considering recent developments in Sydney, it is time to reconsider the proportion of open space in Adelaide's west occupied by golf courses. Who owns these social licenses for these spaces? Imagine just third of them devoted to new forested public parks.

Deaths from heat are disproportionately high among people who work outside, the elderly, people with pre-existing conditions, those who are socially isolated and people who don't have access to a cool space for relief. Excess deaths in population studies are now generally ascribed to heat and smoke issues. Many who can least afford an air conditioner also live in areas with poor tree cover or access to transport.[4] This highlights the crucial role tree canopy plays in mitigating the health impacts of climate change.

Grasses As Well As Trees

We also would like more emphasis on green beyond trees, including converting public lawned space to native grasses capable of supporting diverse populations of birds, reptiles and insects instead of the sterile mowed lawn. Use of artificial turf should be banned in South Australia for its toxic, fossil-fuel based emissions in manufacturing, installation and on disposal. Artificial turf also contributes to the urban heat island effects.

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[3] Submission to the SA Parliamentary Inquiry into Metropolitan Adelaide's Urban Forest 2023 http://wacra.org.au/new/wp-content/uploads/2023/06/WACRA-Submission-Urban-Forest-Inquiry-130223.pdf

[4] 'Silent killer': more than half of heatwave deaths are in disadvantaged areas – now Australian councils are fighting back, https://www.theguardian.com/news/datablog/2023/oct/29/silent-killer-more-than-half-of-heatwave-deaths-are-in-disadvantaged-areas-now-australian-councils-are-fighting-back?CMP=Share_iOSApp_Other

SPP12 -ENERGY

Any progress in sustainable infrastructure that reduces emissions and harvests solar energy to meet net zero targets is welcomed. We agree that areas of high scenic and environmental value should be protected from such infrastructure developments with planning at land division stages.

Community Batteries
We welcome the attention on SA's renewable energy action and agree that we could do much more. In terms of the outcome of a more equitable and socially cohesive metropolitan Adelaide, WACRA is supportive of much more work to install community batteries capable of tapping in to excess rooftop solar generated in sun-drenched South Australia.

So much of this energy could be used to lower prices, providing relief for renters and low-income people who cannot afford the capital cost of solar panels for their homes. WACRA has advocated for community batteries with our local council and hopes that their enthusiasm for this initiative will lead to action.

SPP 13 – COASTAL ENVIRONMENT

What could be of more environmental significance than Adelaide's coast? The beauty and attraction of the coast is a magnet to be protected through sound management of environment and infrastructure.

Plan for Coastal Roads
The GARP Plan proposes strategic infill along both Henley Beach and Grange Roads, but does not address how to handle traffic that is bound to increase along the coastal roads such as Seaview Road and the Esplanade with the increased population using Henley Beach and Grange Roads to get to the beach. Our east-west road system was never designed for the level of urban infill that has been happening even before the proposed growth occurs. This is definitely one area where innovative public transport options are needed along with other strategic planning.

Growth of defence industries on the Lefevre Peninsula will result in increased north-south traffic by workers living to the south using Military and Seaview roads. WACRA proposes that major planning for the roads running parallel with the completed Coast Path be undertaken.

The closest north-south roads of any carrying capacity near the coast are Tapleys Hill Road/ Brighton Road and Military Road north of Grange. These roads could form the spine of a new strategy, especially if made into attractive corridors of trees and safe bikeways.

Blue-Line West e-Bus Service
Eight years ago, WACRA submitted a plan to the City of Charles Sturt to trial a Blue Line West e-bus service connecting the Glenelg tram to the Grange Train. The service would run along Military Road and stop at busy destinations such as the West Beach Adelaide Shores caravan

and holiday complex, the West Beach shops and Surf Life Saving Club, Breakout Creek/ Purruna Pari wetlands, Henley Square, Grange Jetty and beach and Grange Railway station.

If the State extended the rail line to Semaphore, then such a service could include Point Malcolm and Semaphore. Such a regular service would reduce road traffic, need for more parking spaces, and provide safer and more enjoyable modes of transport along the coast in conjunction with the completed Coast Park Path.

Beach Management Through Dredging and Green Engineering

As part of WACRA's submissions to the Beach Management Review currently underway, we have supported the option of dredging to supply sand to the West Beach area, not a pipeline and not trucking.[5]

We believe that, on the basis of information provided so far, dredging as Adelaide's primary beach management tool could mitigate climate risks, combined with complementary methods of growing dunes, planting dunes and growing seagrass meadows.

SPP 14 – WATER SECURITY AND QUALITY

WACRA support all efforts made by many stakeholders, including local governments to climate-proof Adelaide's water. Adelaide has the advantage of a cooperative culture working to develop a Resilient Water Future Strategy and an active desalination plant to supplement other shortfalls.

SA is known as the 'the driest state in the driest continent', so water has always been a prominent issue. Strategies have included local governments investing in recharging our underground aquifers, using sewage water for agriculture and recycling water for metropolitan public parks and gardens.

Water security will always be a pressing issue, as we found out in the 2001-2009 Millenium drought. Since then, 11 metropolitan wetlands have been developed. The desalination plant was built in 2012 to provide some security from future climate change conditions. That plant was built to desalinate 100 gigalitres per year and presently is running a reduced maintenance load which is used to top up Adelaide reservoirs and keep its maintenance contract.

SA Water operates 11 desalination plants across the State, two using sea water at Lonsdale and Penneshaw and the other nine treating saline groundwater in remote communities. This engineering strategy takes pressure from groundwater, surface water and River Murray supplies.

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[5] Submission to the Independent Panel - Adelaide Beach Management Review, October 2023. http://wacra.org.au/new/wp-content/uploads/2023/10/WACRA-submission-to-ABMR-IAP-151023.pdf

The Murray River agreements have not been fulfilled through the Murray Darling Basin Plan and will need to involve strong Federal legislative requirements of the eastern states to protect Greater Adelaide water supplies. Future planning of regions MUST have guaranteed water supplies.

SPP15 – NATURAL HAZARDS

WACRA members have direct experience of coast erosion over decades and hold serious concerns that the latest Review will be able to find an adaptive solution to continuing coastal erosion. We have been active in advocating that Government to use science and best evidence to create a way forward for this vital problem.

Whatever solution is chosen, science about its success or otherwise will be valuable commercial IP for the State to export as long as this is built into its operating budget.

GARP Outcome – A more equitable and socially cohesive place

Where to with Reconciliation?
Following the defeat of the Referendum on the Voice and Constitutional recognition, it is more important than ever for SA to establish its own voice to Parliament to bring different voices of First Nations people in SA to the table. No one disputes that the legacy of missions, Stolen Generations, juvenile justice systems and mistrust at all forms of 'white' assistance, has left many Aboriginal and Torres Strait Islanders in very disadvantaged life situations.

Combine this with the insidious effects of intergenerational trauma and early mortality. including youth suicide, this community requires as much support as the Government can give to empower Aboriginal leaders, established and up-and-coming. They will be leaders who can forge a path forward.

The UN Declaration of the Rights of Indigenous Peoples can form a framework for evaluation of progress, now that there is not a Constitutionally enshrined voice. In 2009, Australia ratified this Declaration and ten years later, in 2019, the national government began steps to develop a National Action Plan to implement under its protocols. SA needs to have input into this plan and to use its benchmarks to evaluate its progress for our Aboriginal citizens over time.

Mixing Up Housing Stock to Shake Up Social Inequality
Adelaide, like every Australian large city, has its share of 'desirable' and 'less desirable' suburbs. In Melbourne, we see the same trend as here with the inner east seen as more desirable than the inner west: Beaumont and Burnside vs Rosewater and Royal Park.

The Atlantic reported recently on statistical research by Professor Raj Chetty of de-identified US tax records that shows the powerful effect of suburbs on children and their earnings as adults. Certain cities and suburbs were better places to raise a child, with the best cities increasing a child's future income by about 12 per cent. Prof. Chetty says that of all the decisions a parent makes in a child's life, the location of where to live is the most pivotal.

Adelaide Needs a Wider Mix of Housing and Locations
The implication of this study is a call for the GARP to seriously examine how to mix up housing forms and affordability so that people are not stratified necessarily by suburb housing price. We have such a limited range of housing types – the one family home and backyard, the walk-up two-bedroom flats and now, the duplex townhouses dotting most suburbs courtesy of our existing Planning Code.

Where do we have the large family-size apartments? Where are the affordable rental homes? The mistakes of the past, where whole suburbs were built by the SA Housing Trust in good faith, cemented the legacy of these suburbs as a less equitable alternative. Somehow, incentives are needed to shake up the type of housing everywhere so that more choice is introduced into the housing stock. Metropolitan Adelaide could begin to look more socially cohesive across the range of regions within it in a win-win for a vibrant, equitable community.

Avoiding Disadvantage Associated With Low Income Suburbs

Denmark recently announced it will demolish public housing neighbourhoods with 'parallel societies' of segregated enclaves of migrants who do not participate in the wider community. With bipartisan political support, the Danes are mandating that no neighbourhoods will have more than 40 per cent social housing by 2030. They use criteria of low income, low education, high unemployment or a high percentage of residents who have criminal convictions to decide which public housing will be emptied or torn down. They will offer these properties to the open market to revitalise the areas.

We do not have the Fitzroy 1960s towers that Melbourne has, but we do have many suburbs in the west that are the legacy of 'warehousing' new Australians in low-standard housing. While not as extreme as Denmark, Adelaide must make a commitment to integration of new arrivals in housing that does not discriminate, stigmatise and lower their life chances from the start. Spreading new arrivals evenly throughout the community revitalises all suburbs and gives new life to settled areas.

Opportunities for disadvantaged people to move to affordable or social housing in more advantaged suburbs can have a key outcome in terms of student learning. With SA towards the bottom of Australia's NAPLAN results, only higher than the Northern Territory, a more radical restructuring of opportunity via housing mobility may be a key to accelerating those results, along with other initiatives in literacy and numeracy being undertaken in the schools.

Bring the Arts into Planning

Story-telling, First Nations marking, social inclusion, beautification of suburbs and place-making are essential elements when planning to achieve the four GARP outcomes. These arts and cultural elements could bring new people around the table in planning teams, a mixture of gender, skills and experience, contrasted with the mostly male professional project-teams. The results of more wholistic planning would reflect a multiplicity of stories, perspectives, a richer view of planning to include women, children, older people and others with disability.

Currently, the space for indoor and outdoor arts and community entertainment are given low priority compared to commercial interests when new developments are planned. Consideration of repurposing heritage buildings to keep their fabric and use for community purposes builds a sense of connection to the past and acts as a bridge in our fast-changing world.

The Woodville Town Hall, for example, is now a multi-purpose entertainment, cultural, and gathering place in our community with programming facilitated and promoted at the local government level on behalf of the community. The new cities on the outer ring will need equivalent gathering places, not just houses and shopping centres, so that people will be able to engage as a community in arts and social events, ameliorating the loneliness epidemic and building new healthy relationships.

Rebuild Adelaide's Network of Comprehensive Community Health Centres
To achieve the GARP outcome of 'a more equitable and socially cohesive place,' a comprehensive model will include the interaction of physical, cultural, emotional, economic and social health in communities and individuals. The comprehensive community health centre model is noted for its capacity to build social cohesion, reducing social disadvantage, and building a fairer more compassionate society. Multi-disciplinary teamwork is vital and needs to be well co-ordinated.

Programs and services reach across the community health continuum – including disease prevention and health promotion, assessment and management of health problems, early intervention, support, treatment and rehabilitation.

Community engagement is vital and drives identification and assessment of health issues, informs advocacy and community development, enables group programs to build individual and social capacity, sensitises and links to individual treatment services, and influences the management of the organisation to ensure programs are relevant and locally responsive.

When planning for new satellite communities outside metropolitan Adelaide, acute and primary health care are also essential elements to service healthy communities.

SPP1 – INTEGRATED PLANNING

Social and Physical Infrastructure For Liveable/Walkable Neighbourhoods
It is no longer acceptable to simply outsource a new development to a developer and hope that it will contain all the social infrastructure needed to build a community. Setting criteria for liveable/walkable neighbourhoods would definitely up the ante for developments to have less car dependency and to make it more pleasant to move around on foot, bikes and scooters. Roads, schools, water, green infrastructure and healthcare are key components of quality of life, no matter how far from the city new housing may be.

WACRA endorses the policy of transparency about costs for different forms of housing supply, including the upfront purchase price plus information on ongoing living costs, particularly as GARP's proposed new zoning will permit housing further from the CBD than ever and transport costs rise with distance.

Developments of public spaces often suffer from sins of omission rather than of commission, often built on a cut-and-paste template. New home buyers do not usually ask for clean air, walkability, arts or community facilities. As a result, the health and well-being costs are borne in a different sector and often at a different time than when young buyers purchase their 'dream home'.

We need a planning model that places the onus for improvement in quality of life including clean air, walkable streets squarely with those who most profit from new developments, the developers. Disclosing the costs of living in their new homes over time is another suggestion that we support.

SPP2 – DESIGN QUALITY

Increased Access to Nearby Green Spaces

Adelaide has traditionally had fewer pocket parks than, for example, in Sydney where a dense population can walk to a nearby park for recreation and play. Because Adelaide has had space, we have spaced out playgrounds and parks. WACRA believes everyone should have access to high quality, well vegetated open spaces in easy walking distance. This should be a requirement in all greenfield and strategic infill developments.

Market the Value of Trees

There are pockets of resistance in some lower socio-economic areas to the idea of 'trees'. Trees for some have come to have a menacing rather than comforting meaning. Along with urban greening policies being applied equitably across all forms of housing supply, we urge the Government to roll out an education campaign about the value of trees.

Major new recommendations for multi-storey developments along city feeder roads need to be coupled with planning for avenues of trees, such as Paris, Barcelona and other cities are doing. These soften the height profile eventually and provide identity, biodiversity and heat island amelioration.

Liveability in Character Zones

WACRA is keen for the Review to follow up on identifying areas for additional heritage and character protections. Given that the west is largely 'settled' in waves of time, there will be many character areas that could benefit from this added layer of scrutiny and protection. The past decade has seen a lot of heritage knocked over, with little regard for this important story of the cultural settlement in Adelaide in various waves.

Those already living in character and heritage zones will wish to retain what attracted them initially and not lose their heritage value with modern 'big boxes' changing their neighbourhoods' built form and charm.

Design for Intergenerational Housing

The rise of the service economy, where many new migrants get work in areas such as disability and aged care in particular, coincides with new residents who want to and do live in a multi-generational family structure. Adelaide has previously not given much thought to creative application of design to this challenge. Many of these new SA residents have come from more advantaged backgrounds than previous waves of migrants and will have the means and incentive to rent and buy housing for their extended family.

The pandemic has also shown that many families moved closer to each other to provide support. Traditional Australian housing forms close off options for grandparents to live on the property but separately. Overseas, granny flats have become staples of boosting numbers of people on a block and able to operate as a family with independence. WACRA supports review of zoning that opens more options for extended family living across generations.

GARP OUTCOME: A strong economy built on a smarter, cleaner, regenerative future

SPP1 – INTEGRATED PLANNING FOR EMPLOYMENT LAND ALLOCATION

WACRA approves of the proposed employment land allocation in the north-west, including Gillman, Wingfield and Lefevre Peninsula. In previous decades, residents in these and nearby suburbs have suffered respiratory illnesses from emissions of heavy industry and mineral processing.

Strict environmental and noise criteria need to be developed and enforced when industry is located close to residential housing. If this is maintained, it may be possible to extend the types of housing and density, to make this land more desirable than it currently is. The trend towards cleaner and quieter industries may coincide with new residential opportunities that work as employment magnets.

SPP5 – CLIMATE CHANGE

Potential for a Western Green Industry Hub
The west of Adelaide is perfectly located to take advantage of green technologies, carbon storage, cleaner industries and the regenerative economy. Local governments in the west are all working towards these outcomes, no matter what happens with the AUKUS project. There is a need for a university campus in the west to act as a magnet and hub for developments, such as Tonsley/Flinders south of the city and UNI SA's Mawson Lakes in the north.

The Outer Harbour train-line, the north-south corridor and a growing skilled workforce make this an attractive destination for state planners to work with local partners to establish a new Green Industry Hub in the west.

Zero Waste and Recycling Facilities
Work between partner councils, Port Adelaide Enfield and the City of Charles Sturt has pioneered a shared waste management and recycling facility. More economies of scale as future recycling goals are introduced make sense rather than piecemeal small installations. We would like to see the GARP introduce stronger incentives to accelerate this trend for the circular economy.

GARP OUTCOME: A greater choice of housing in the right places

SPP1 – INTEGRATED PLANNING

Support Diversity in Housing Options
WACRA supports the priorities and directions that maximise housing choice and different forms of housing. This includes integrated, not clustered, social, affordable and accessible options. We have been poorly served by the choices on offer. Infill sites that are project managed strategically can and should provide this diversity.

In the west, we believe that as well as targeting Henley Beach and Grange Roads and all potential sites along the Outer Harbour and Grange lines should be considered for higher, denser apartment living at accessible transport locations with the proviso that the existing north-south roads are also master-planned for safety and amenity.

SPP2 – DESIGN QUALITY

Support Wide Implementation of Liveable Housing Criteria
South Australia has now signed up to the silver level of liveable housing in all new homes. This overdue initiative means that people will be able to access a level entrance, wider entry door, reinforced wall for grab-rails in the bathroom and a hob-less shower, should that be needed. The consequent amenity in new built homes will show its worth as people transition through life cycles, meaning they do not have to move if they have a serious illness or accident, or just want to age in place.

WACRA urges the Government to integrate information about liveable housing requirements in SA throughout the building industry as a widespread reform that will begin to future-proof new houses for demographic trends of ageing.

These homes are not designed for people with severe physical disabilities and the stock of the accessible homes needed by these people to rent or buy has always been in high demand. The challenge to establish them is starting to be met by social entrepreneurial organisations and some super funds, but more needs to be done in planning regulation to incentive providing housing that will give physically disabled South Australians more choice.

Strengthen Thermal Efficiency Standards for All Homes
We also would like the Government to adopt more ambitious climate protective requirements with thermal efficiency criteria for new houses, as it is clear that more heat, more rain, more flooding and fire are the future of our State. We pride ourselves on being enlightened, yet unless these types of criteria are mandated, builders can always rely on the 'price' argument to defer these treatments for another time. It is then that both new home buyers and renters least able to withstand bill shocks are slugged for the lack of thermal efficiency in their homes.

There is a divide between people who are living in well-insulated double-glazed houses, and people who aren't. People who aren't are going to have increased power bills. Many people with co-morbidities don't have a cool place in their homes which increases the risk of death from heat stress.

Now is the time to be future-proofing our homes. Insurers will look with favour on homes that have these characteristics, compared with basic fit-out. Energy costs for residents will be lower and amenity better in extreme temperatures. Landlords can benefit from securing good long-term tenants who value these amenities and home owners can also reap benefits with renters in lower utility bills

THE URBAN FORM TO BRING OUR VISION TO LIFE

Liveable Communities do not just 'Happen'

WACRA was not surprised that the testimonial in the Discussion Paper is from a western resident, Bowden woman, Renee Slugjski. There are many areas in our west which already demonstrate the living locally elements proposed by the Paper.

Local governments, networks of community association, residents' groups, tireless champions of areas have all added their energy to create such liveable communities. The pay-off is that where walkable local living communities exist, property values for existing residents rise.

The challenge to this plan is how to engender this change with community partnership and local government support, as it is this area of government which works most closely with local networks to either frustrate or move towards the four GARP outcomes.

State agencies, working with the Local Government Association and developers could form creative partnerships that enable the idea of liveable community to form the nucleus of any newly created developments.

INFRASTRUCTURE AND SERVICES

WACRA will not comment on the greenfield growth areas as they are not in our western area. However, as climate change and net zero futures become more of a reality, the established and ageing infrastructure of metropolitan Adelaide will need conversion. Timing this renewal and maintenance to happen sequentially, before it becomes less useful, is an important part of a considered plan such as GARP.

We have the benefit of a well-planned community in West Lakes with Delfin (now Lend Lease) as its property developer. Opened in 1977, the infrastructure and services within it have functioned well, and with the move of the Adelaide Crows out of Football Park, we have seen what adaptive reuse can do to kickstart a new round of neighbourhood development with West.

URBAN INFILL GROWTH

Regenerated Neighbourhoods

In the western suburbs, we are watching many old Housing Trust neighbourhoods being progressively modernised where there was a predominance of them. It is not clear that there is a wider range of housing types being built but there appear to be more apartments than the traditional small stand-alone house.

Focus on Established Urban Activity Centres

Of the urban activity centres based around shopping centres in the west, we are already seeing massive development around West Lakes in housing, the new Ngutungka library/ community hub and other service industries. We agree that Arndale, with its large mix of multicultural residents, closeness to the CBD, shopping, health and other services would be a prime area for further higher-density housing to boost its economic viability and celebrate its community vibrancy.

Better Planning for General Infill

WACRA wholeheartedly concurs with the GARP analysis that 'the Commission recognises the need to manage small-scale infill with greater care to address community concerns about poor design, tree canopy loss, street parking, and detrimental effects on area heritage and character.' We addressed these and more in our submission to the Review of the Planning and Design Code and await their findings with interest.[6]

EMPLOYMENT LANDS

Climate Risks to the Future Scenarios

The section of the Discussion Paper canvasing trends in employment lands fails to mention potential climate risks escalating rapidly over the 30-year timeframe of this plan. This seems a major omission.

Maps of projected sea level rise show how it will affect Adelaide beaches and the Port River area. The higher water levels will result in flooding throughout much of the low lying west, an area that used to be the Reedbeds.

Adelaide has not seen the ravages of floods that eastern Australia has endured, but that does not mean that, even with the best planning, these events will not begin to occur. Each

[6] Planning, Development and Infrastructure Act 2016 - Western Adelaide Coastal Residents' Association Submission, December 2022 http://wacra.org.au/new/wp-content/uploads/2023/07/WACRA-submission-on-SAs-Planning-Act-and-Code-Dec-2022.pdf

degree of global warming brings a 7 per cent increase in humidity in the air, which means rain and storms accelerate in their destructive power.

In the northeast, east and south, areas with high eucalypt coverage, the threat of mega fires will rise and have serious consequences.

Agriculture, both in Australia and globally, will be impacted by droughts and floods to unprecedented levels. Consequently, we will not be able to assume that world food trade will operate as normal and provide us with what we need to maintain our lifestyle. This is another reason to ensure we maintain a diverse and sustainable supply of agricultural land.

Threats to Increased Household Consumption and Global Trade

This section of the Discussion Paper seems to be based on wishful thinking. We may be on the edge of a period of depression and/or a world at war. Our defence industries might benefit, but the current belt tightening may be only a precursor to people living much more restricted lives.

Planning for a restricted future, as the defence forces do for future scenarios, may be a better way to frame this Discussion Paper's outcomes. If this does not come to be, then well and good, but if it does, at least the Government has 'war-gamed' keeping the economy afloat when unemployment may surge and growth turns negative. What measures could we take now?

The Role of New Infrastructure in Reshaping Urban Geographies

We mentioned before the big boost that the north-south corridor project will bring to the west. Adelaide Airport too will be a pivotal hub, connecting us with trade, tourism and freight as a trade gateway.

The revamped Outer Harbor passenger terminal is a crucial link in the tourism economy and the nearby Osborne precinct will also become a major contributor to revitalising and reshaping the northwest suburbs.

Impact of COVID-19 on Employment Lands

The Adelaide West region is growing quickly with the settlement of many new arrivals, often working in service economy jobs to fill vacancies. Given the projected growth of the care economy, WACRA anticipates this trend in employment demand will continue to accelerate.

As old heavy manufacturing makes way for new forms of advanced, AI driven, digital manufacturing, many of these new residents will use their higher education levels to participate in and start new businesses in this sector and creative, green economy niches.

Current Employment Land

The Adelaide West region accounts for more than 4,000ha of the 13,000ha of zoned employment land in the Greater Adelaide Region. Employment types cover traditional industry (LeFevre Peninsula), freight and logistics (Adelaide Airport, LeFevre Peninsula,

Winfield and Regency Park), knowledge intensive (Torrensville) and population serving (Beverley). These areas are all supported by existing infrastructure.

Employment Lands Role in Urban Greening

WACRA believes that the conversation about urban greening needs to be had with existing and future owners of industrial land so that vacant areas of land surrounding workplaces could contribute to meeting Adelaide's greening targets. How can GARP excite this sector to play a larger role in their custodianship of land for overall greening outcomes?

OPEN SPACE AND URBAN GREENING

Coast Park Path

WACRA has been a consistent advocate of completing the Coast Park Path, the 70km cycling and walking trail bringing the amenity of the seafront to Adelaide residents, visitors and tourists. We support the State Government's efforts to complete Stages 1 & 2 between Semaphore Park and West Lakes Shore as soon as possible so that this long-gestation project, which began under Minister Diana Laidlaw in 1992, will finally see the conclusion of this blue corridor for pedestrians and cyclists. It will be a major tourism attraction when people are able to cycle or even walk the whole length of this scenic path that provides mental and physical health benefits to our city.

Urban Greening Targets at Risk

We understand Green Adelaide is collaborating with many partners on an Urban Greening Strategy to respond to increasing the urban green cover across metropolitan Adelaide. We are starting at a low base compared with many other jurisdictions and the past 10 years of the current 30-Year Plan have seen progress towards targets go backwards as rampant clearing of private residential trees occurred with the infill policy.

Premier Malinauskas to Lead the Charge

Adelaide will have to make some tough decisions about how to achieve even this bare minimum target with resourcing, education, legislation and incentives. The most effective cities to achieve green targets are the ones where government leaders make this goal their number one personal target. We urge the Premier to join the likes of Sadiq Khan of London and Anne Hidalgo of Paris to move beyond ephemeral projects and seriously commit money, workforce and enthusiasm to a green Adelaide.

IMPLEMENTING THE GREATER ADELAIDE REGIONAL PLAN

We applaud the foundational building blocks behind the Discussion Paper as a springboard to a more equitable, green, growing Adelaide. The challenge is to find the levers for this change, igniting the vision with the business and community leaders to propel change forward.

Form Regional Future Forums

From our contribution we would also ask the planners to think about how various regional metropolitan perspectives could be factored into evaluation. What might be true in Lockleys might be very different in Lightsview. No one plan can hold all the different lived realities.

There is a benefit in detail and evidence from the local perspective, as we hope you may have appreciated by our focus on this region in our Western Roadmap.

Although there are 19 local governments in metropolitan Adelaide, planning for future outcomes once this plan is implemented, may well require collaboration through regional forums, much like planning for equitable health services has benefited from regional administration.

No one size fits all, but the local governments have a vital role to play at the local level. Short of Council amalgamations, GARP could recommend vehicles like Regional Future Forums in geographic clusters, where partnerships and collaborations could be established at the level of policy and shared planning decisions in future directions for the benefit of all. This economy of scale and working together as Green Adelaide is modelling will tend to achieve the wider outcomes you are aiming for.

Problem with 30 Year Plans

We live in a time of unprecedented change: with technology, climate, world interdependence and instability. Things have always changed. 100 years ago, we had liveable, walkable communities, often with churches at their hubs. Today, most people have never even been in a church, but they might appreciate a walkable neighbourhood for health, economic or climate change reasons.

We need to respond to the world as we see it changing and for this reason, we question the value of setting yet again, another 30-year plan. The previous plan has dated badly and is not fit for purpose one third of the way through its projected lifespan. We therefore ask that as part of preparing Adelaide for a resilient future, that you incorporate five-yearly evidence-based reviews which have the potential to modify sections, or even all of the plan.

To plan for a 30-year span is important, but the mechanisms needed to be response and adaptable when evidence changes need to be built into this GARP plan.

Ongoing Evaluation and Transparent Feedback

Ongoing evaluation will be essential to keep the plan robust and relevant. How could GARP incorporate voices of lived experience with an ongoing feedback, critique, recommendation mechanism, such as most local governments use? Quality of life is often most successful or unsuccessful in seemingly small, local details. Trends towards equality and opportunity could be reported back as they happen with an open transparent portal seeking such data.

Thank you for the opportunity to comment on this plan with some of our views on A Western Roadmap. WACRA is keen to see an emphasis on wholistic planning to avoid unintended consequences, and for the GARP to build ongoing feedback and evaluation into its operation to realise its four foundational outcomes.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 12:29 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater-Adelaide-Regional-Plan-Submission-Westside-Housing-6-November-2023.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	Julie
Family name:	Blake
Organisation:	Westside Housing Company
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Thank you for the opportunity to participate in this process by submitting the attached document.
Attachment 1:	Greater-Adelaide-Regional-Plan-Submission-Westside-Housing-6-November-2023.pdf, type application/pdf, 178.2 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

Westside HOUSING

6 November 2023

Greater Adelaide Regional Plan Submission

About us

Westside Housing Company is a registered charity and a registered community housing provider operating in South Australia. We work alongside our colleagues in public and community housing to act as a safety net for people who are unable to access the housing system.

Founded in 1984, we provide a place to call home for more than 1,000 people in 460 homes across the Adelaide metropolitan area and the hills.

We develop, manage and own safe, sustainable, and affordable rental homes for people who are disadvantaged. We have a strong focus on women and their children leaving violence, older women, and veterans. 66% of our tenant community are women, and 50% of tenants live alone which is double 25% of the broader Australian community who live alone[1],. As quoted in the GARP Discussion Paper there has been a 78% increase in people living alone in SA over the past 30 years.

Context

Pressure on the housing system

It is well known that our housing system is in crisis, and this is disproportionally impacting people living on the lowest incomes. The. rental vacancy rate in Adelaide is at an all-time low and is the lowest in Australia at 0.3%. Coupled with high inflation and rental amounts increasing at unprecedented levels, 7.2% in the latest CoreLogic report[2] we have a pressing need to increase the supply of smaller dwellings for our community.

The confluence of these matters is placing pressure on all parts of the system not least of which the waiting list for social housing which currently contains nearly 20,000 applicants.

Low-income households can't find affordable rental near employment

A recent 2021 AHURI research paper identified that a critical part of the workforce, people on low incomes, cannot find affordable rental housing near employment centres and 71% pay an unaffordable rent over 30% of income [3]. Pathways out of poverty require social and affordable rental housing to be increased in good locations close to access to employment without expensive travel costs.

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[1] https://aifs.gov.au/research/research-reports/demographics-living-alone

[2] https://www.corelogic.com.au/news-research/news/2023/vacancy-rates-reach-new-record-lows-despite-rental-growth-easing

[3] https://www.ahuri.edu.au/research/final-reports/353

Comments

A greater choice in the right place

Ancillary dwellings

Westside Housing, alongside our colleagues in public and community housing owns houses in our portfolio with large gardens that are not financially viable to redevelop due to several factors and the gardens are unmanageable for tenants.

We have identified that the use of this excess land would be perfect to construct a secondary dwelling (often referred to using the gendered term “granny flat”) and we aim to roll out a program of installations across the portfolio.

However. after two years we have just commenced on site with the first dwelling, but the price is high due to degree of difficulty for the contractor and the low number we have through planning as well as sub-par housing outcomes for the occupants of both the existing and new dwellings due to council requirements. This has resulted in Westside Housing placing this program on hold until the barriers are removed.

Ancillary dwellings both on private and public/social housing land should be a useful part of the strategy to solve the housing crisis as they do not require land acquisitions so should be quicker and cheaper than other options and they are small which suits the increasing number of people living alone in our community.

The strategy to build ancillary dwellings in back/side gardens on existing social housing properties has been successfully implemented by the Tasmanian state government, with the Salvation Army Project 9 an example Project 9 on Vimeo.

The state government has publicly identified council barriers to the construction of these dwellings contained in development approvals and Westside Housing strongly supports the continued focus of the state government on this matter.

The current barriers encountered by Westside Housing include:

- The requirement for occupants of both dwellings to be related.
- Fencing is not allowed between the dwellings.
- Services are required to be shared which is likely to cause issues in terms of splitting water and electricity costs.
- The lengthy process through planning and the above barriers have resulted in high prices due to the small number of orders able to be placed at one time.

Planning barriers for a well-located project in Bowden

Most community housing providers have well-located properties in their portfolio that could be redeveloped but have not been due to the cost, the time, and the resources required to submit a change to the Planning Code. These projects could increase the supply of social and affordable housing particularly targeting people living alone such as older women.

Westside Housing has an example project adjoining Renewal SA's "Life's More Interesting" Bowden site and sitting alongside Park Terrace so with limited impact on neighbouring properties. The site is community housing and Westside Housing holds the title with a Statutory Charge held by the South Australian Housing Trust.

A redevelopment of the site could potentially result in 50+ dwellings but the existing Planning Code only allows circa 30 dwellings (with considerable planning risk remaining in achieving this even without a Code Amendment).

An expedited simple planning process for this site and other similar mixed social and affordable housing opportunities would assist and encourage registered community housing providers like Westside Housing to tackle a project like this without incurring high costs that would make the project unviable. The current system often precludes or minimises the desperately needed social housing outcomes due to the costs.

A favourable planning pathway, possibly sponsored by the South Australian Housing Authority whereby the planning sensitivities of any Code Amendment for a predominantly social housing mixed with affordable housing project are considered and weighted appropriately to help ensure certainty over the requested planning outcome. A simple assessment criteria and prioritised process would assist to expedite construction of potential inner-metropolitan well-located projects.

This approach should apply to not only this site but to other sites across metropolitan Adelaide where existing larger community housing redevelopment sites that are ripe for redevelopment and are adjacent to existing public transport infrastructure, shopping, health, and community precincts are provided with a smoothed planning pathway that are sponsored by Government.

This would also result in more sustainable social housing will the renewal of poor performing dwellings with high utility costs.

This is particularly applicable and apparent at this junction point with the availability of Federal Government grants and subsidies at this time i.e., the Housing Affordable Future Fund (HAFF) etc.

478 Port Road
West Hindmarsh
South Australia 5007

t. (08) 8155 6070
admin@westsidehousing.org.au

DTI:PlanSA Submissions

From: Cally Malone [redacted]
Sent: Thursday, 2 November 2023 9:17 AM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: YEC submission to GARP discussion paper.docx

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

Hello

Please see attached a submission to the Greater Adelaide Regional Plan discussion paper.

Thanks

Cally Malone-Faulds
Education Coordinator - Youth Environment Council
Wednesday-Thursday

Green Adelaide
Hosted by KESAB environmental solutions
[redacted]
214 Grange Road, Flinders Park SA 5025
Marni ngadlu tampinthi ngadlu Kaurna yartanga inparrinthi
(We acknowledge that we are gathering on Kaurna Country)

Join us to create a cooler, greener and wilder metropolitan Adelaide.

The information in this e-mail may be confidential and/or legally privileged. Use or disclosure of the information to anyone other than the intended recipient is prohibited and may be unlawful. If you have received this email in error please advise by return email.

Youth Environment Council submission to the GARP discussion paper

8 members of the Youth Environment Council of South Australia (aged 11-17) met with Green Adelaide education staff to discuss the YourSay questions related to the Greater Adelaide Regional plan discussion paper. Submission content was scribed by Green Adelaide staff during discussions with young people. 1 member also responded to the questions via email.

What is most important to you?

	Member 1	**Member 2**	**Member 3**	**Member 4**	**Members 5 & 6**
Climate change	2nd priority	1st priority	1st priority	2nd priority	1st priority
Housing	1st priority	3rd priority	3rd priority	1st priority	3rd priority
Jobs	4th priority	5th priority	5th priority	5th priority	4th priority
Open green spaces	3rd priority	2nd priority	2nd priority	4th priority	5th priority
Inclusive Communities	5th priority	4th priority	4th priority	3rd priority	2nd priority

What do you like about your current local neighbourhood?

- natural areas; train line with plenty of birds, kangaroos, bush rats. Conservation parks.
- School Zone; Botanic and Adelaide HS Zones
- Library
- Community spaces
- Free public transport; tram stop to go to and from work
- Goolwa, plenty of activities, library (central), access to ovals and free activities.
- My local neighbourhood is Aldinga Beach, I love the location and the prioritisation of the natural habitat, referring to the Aldinga Scrub Conservation Park. Additionally, we have a wide spectrum of people ranging from low socio economic to wealthy. I like that we can drive onto the beach but with restrictions depending on the time of the year. I think it's awesome that we have green spaces for younger kids to run around and enjoy play equipment. We have lots of both public and private schools which is great however, I don't attend any of them and go to Woodcroft College instead.

What do you think your local neighbourhood is missing?

- Large green spaces
- Native biodiversity and overall more plants
- Clean air and needs more trees
- More trees around Goolwa (productive for a corridor so birds and animals have a safe way to travel).

- inner parts of Goolwa that could benefit from more trees
- More trees and plants, semi-industrial area, big buildings and empty spaces. Lack of native trees, preference to trees over grass.
- Thebarton, large green spaces, Kings Reserve example. Issues with football club wanting to use space and losing trees / clean air. Limited plant life and trees, need to protect and Council is not prioritising as they move forward. Noted South Road also.
- We have an amazing library with lots of seating and options however the opening hours don't support studying students. Closing at 5pm week days and 7pm Thursday, I know many kids (myself being one), who only get home at 5pm. Additionally it doesn't open at all on Sunday and Saturday is only from 10am – 1pm. Having a 24hour or just to 7pm every night would be amazing for student's to break up long study sessions and find a quiet place to get work done.
- While there are many establishments suitable for the general public a youth hub would be amazing. While we do have studio 20, with specific activities, something that was open as anytime to be a place to hangout so teens aren't wondering the shops but instead connecting. It could include things like: sports equipment, with a basketball hoop, a small gym area, studying nooks, creative art opportunities with basic instruments, class opportunities (for example, learning how to cook where the food goes to charity). The options are endless, and I think this is something my community which is full of teens could really benefit from. Especially as a place without a shopping centre, or bowling ally, those type of things. I understand that those additions aren't relative to the size and progression of our suburb so something smaller to encourage teens getting out would be perfect.
- The train line doesn't reach Aldinga which is a huge inconvenience for workers and university students especially. With such high petrol prices and general inflation buying and running a car is more expensive than ever. If the train line reached Aldinga that'd be phenomenal for so many people.
- Aside from that, we need to make Aldinga as sustainable as possible. Many people travel long distances from the suburb everyday for work, school, appointments etc. So, ensuring that we look into renewable energy sources, where we might prioritise solar power and cutting down on unnecessary emissions by having accessible and high-quality bike paths. Littering can also be a big issue, so recyclable, landfill, and dog waste bins (with dog bags available) on the most commonly walked paths. Fast food chains like McDonalds do have recyclable packaging, but people especially teens walking around don't have anywhere to dispose of them correctly. Furthermore, planting trees to attract native birds, and picnic benches for families and friends.

What part of the Greater Adelaide region would you like to live in?

City – 1 vote

North – 1 vote

South – 0 votes

East – 1 vote

West – 1 vote

Hills – 3 votes

Towns (Victor Harbor, Murray Bridge etc) - 2 votes

Outside the Greater Adelaide region/regional South Australia – 1 vote

How old will you be in 2050?

Participants will be 41-45

What's one word that best describes how you want Greater Adelaide to be in 2050 (and beyond)?'

- Welcoming
- Biodiverse
- Open – open to change. More green space. A yes vote. Like open-minded?
- Diverse
- Healthy
- Clean

What would you like Adelaide to look like in 10 years' time and beyond?

- affordable
- Inspiring
- Modern
- Ethical
- Inclusive
- Equity (everyone has access to what they need)
- Integrated – the 5 minute cities idea. You should be able to get everything you need in 5 minutes walk I.e. go to the shops, school, work.
- Have a plan for how they can make change for the future with positive effects on the environment
- Welcoming
- I like to see places of significance protected e.g. the beaches north of Adelaide. The critically endangered shorebirds to habit.
- More electric vehicles
- Renewable
- While there are many things that Adelaide holds great potential for, I think the most important goal is bringing our emissions as low as possible and having the greenest Adelaide we can. Talking both literally and figuratively, ensuring green spaces, bike paths, community gardens, solar panels etc.
- Additionally, we badly need a renewed school system, our classrooms look the same as they did 50 years ago, while the rest of the world doesn't. It's absolutely fundamental that this is reassessed and research is applied to our classrooms. Furthermore, modelling our school system on those in the Northern Hemisphere (like Finland and Denmark), which have been successful.

- Koala - I want more eucalypt trees
- Green - Roof top gardens, nature corridors, weekly rubbish group clean ups regionally, more areas in the suburbs parks that have dotted trees but aren't used for anything could be transformed to special gardens, easier access to water maybe

What would young people in 30 years' time want?

- Access to everything they need.
- More environmentally efficient alternatives to things
- Keep areas like the Botanic Gardens and make more
- To remove plastics from the ocean
- Availability of all jobs
- Look after natural areas
- More ways to recycle waste
- Less fast fashion

In the future, what type of home would you like to live in?

Townhouse – 2 votes

Apartment – 0 votes

Traditional house (not attached to another house) - 6 votes

Other – 1 vote

- I would like to live somewhere completely on my own. Or somewhere close by to natural spaces.

Who do you see yourself living with in the future?

By yourself – 4 votes

Friends/flatmates -4 votes

Parents/family - 4 votes

Other – 0 votes

How would you like to travel around the Greater Adelaide region in 15 years' time?

Car – 3 votes

Bus – 5 votes

Train – 5 votes

Tram – 5 votes

Walking – 5 votes

Cycling – 4 votes

Other – 0 votes

How can Greater Adelaide be more sustainable and respond to climate change?

- Electric vehicles
- Invest in renewable infrastructure
- Add more native plants, investing in sustainable ..
- More things within cycling/walking distance
- add more native plants, invest in sustainable options, stop mining, rid of one use plastics
- Electric vehicles, more public transport that ventures further south, have a higher carbon storage by more native plants or even not native anything helps as long as it doesn't spread (not for in remnant vegetation areas)
- Less reliability on fossil fuels
- Decrease in food waste
- Look in more sustainable options for power like nuclear, wind turbines and solar
- Introduce more green/compost bins
- Look into traditional Indigenous ways of managing and caring for land
- no limitations all single use plastics are banned, there are significantly more plants and trees, main sources are from renewables
- Recycling stations at every store and more habitat varieties and options
- All new houses should have solar panels as a mandatory requirement

What are your concerns for the future of the Greater Adelaide region?

- Little action towards climate change
- the greater community is going to continue to ignore these issues and concerns until it is too late
- That if there is no action taken from anyone as population expands the air could become a lot thicker and more polluted
- Poorer infrastructure and land degradation. More populated areas – poorer infrastructure, construction on large levels. With housing especially that home are not built well. Land degradation for rural areas – climate change impacts will be soil becoming infertile.

DTI:PlanSA Submissions

From: Woods, Bret (DTI)
Sent: Monday, 6 November 2023 4:48 PM
To: DTI:PlanSA Submissions
Subject: Youth Inc Submission
Attachments: IMG_1157.jpg; IMG_1161.jpg; IMG_1160.jpg; IMG_1158.jpg; IMG_1163.jpg; IMG_1162.jpg; IMG_1159.jpg; IMG_1164.jpg; IMG_1165.jpg; IMG_1166.jpg; IMG_1208.jpg; IMG_1207.jpg; IMG_1167.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

OFFICIAL

Feedback provided from Youth Inc's school students for inclusion.

Images included and text below.

Cheers,

B

Public Transport sucks.
The cost of paying for public transport on a minimum wage is prohibitive.
Getting a license is expensive.
Employers are asking for a full license.
There are barriers to getting a license if you have a disability.
There are a lot of barriers to getting a license if you have a disability.

Training does not translate to real jobs. So you can't stay healthy.

What makes great transport we need more public transport we need accessibility screens on all bus stops.
We need to use technology for diverse disabilities to be able to use public transport.
Bus drivers are grumpy and don't care. We need friendlier welcoming bus drivers.
We need more trains. Sometimes it takes two hours to commute to work on the bus.
If you're out after midnight, you can't get home. We're told to be safe, but we can't be safe.
Public transport is not affordable.
We need to expand the tram and train network coverage.
Scooters are great, but they're too expensive. And when they're discarded randomly they create obstacles for wheelchairs and prams.
We need very cheap or even better, we need free public transport.
Cars are a problem. Cars are the traffic. But if you don't own a car, but if you don't own a car, there's no there's sometimes no other way to get around.
Adelaide Metro should be publicly owned and free for young people.
Transport should engage access consultants and people with diverse disabilities to plan public transport.
It needs to include sign language and 'how to use the bus' on the bus.

What sort of housing do you need?

Quite literally anything that I don't have to move out of in a year.
Our family has been homeless four times. Because we have disabilities and my grandfather has dementia.
We need more pathways for young people to rent to be able to 'rent to buy'
Nobody can afford the houses that are being built.
There is not enough affordable housing.
It's not right that people profit off of our basic housing needs.
We need better public housing and more options.
There needs to be a clear pathway to obtain public housing.
We are not homeless so we're not high risk enough to get public housing.
The quality of Co-housing needs to improve.
We need quality choices and choose who you get to live with. You need to have some control over who you get to live with.
Tiny homes would be great as one option.
Co-housing needs to be well managed.
We need communal living to have shared garden spaces and outdoor spaces there's not enough green space in apartment living.
Not having easy access to green spaces is depressing.
There is not a one size fits all for Community Housing.
UCity (Uniting communities) is an excellent example for young people in transitional housing.
We need to increase the socio economic and cultural diversity of our suburbs to make unsafe suburbs safer and to make 'rich people suburbs' more welcoming.
We need to support rich people who live in 'rich people's suburbs' to be more welcoming.

We need local shops and villages to be walkable.
The ring route around Adelaide is great.
We need more trees. We need greater tree cover.
We need public spaces for young people to go and hang out without having to spend money.
We need to make sure that there's a home for every kind of family from single people to integrated intergenerational living.

Shared housing needs smaller bathrooms but more storage space.

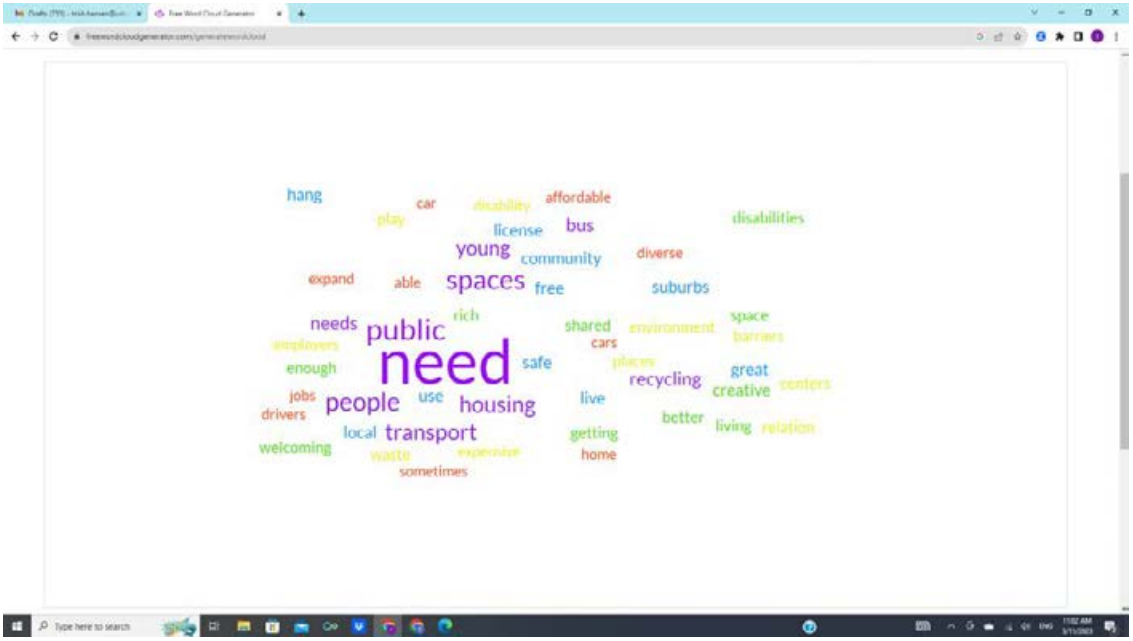
What do you need to have fun, play and for recreation?

We need places for young people to hang out without having to spend money.
We need more public markets.
We need safe community gaming spaces.
We need free things.
We need animal friendly spaces to live.
We need spaces to hang out to study with toilets, charging ports, Wi Fi.
Sensory sensitive spaces in shopping centers and shared housing.
Tonsley is cool. You can skate there. We need more places for people to skate under cover.
We need creative spaces, community creative spaces where people can explore making arts and crafts
It's more than festivals - you don't need a festival to be more creative.
You need a space to hang out.
We need more color more murals, public art.
We need opportunities for the creation of community. Public art can do that.
We need more free shit.

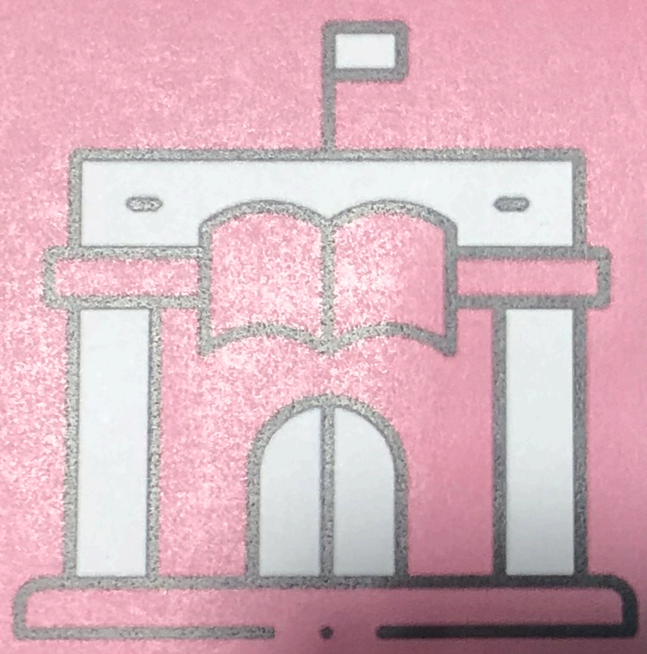
We need to incorporate the natural environment into new building projects.
We need to replace what we've lost in relation to the environment.
We need to incorporate natural spaces or sensory spaces in buildings.
We need to plant more native species.

We need to prioritize the environment as part of building projects.
In relation to waste.
We need local collection facilities.
Local recycling centers, like public transport where you can walk to your local recycling center.
We need to have them incorporated in neighborhoods.
We need more safe places for cycling.
We need better separated recycling in public bins.
It's disgusting that we can't recycle food waste and other materials in public spaces.
We need to reduce waste.
We need more education on recycling.
We could use all bins to do this.
We need to raise the profile of recycling and reinforce and socialize recycling in public spaces, especially in shopping centers.

In relation to jobs we need to regulate the amount of profit employers can make off of employees.
We need to embed social justice education in schools.
We need to expand young people's perspectives throughout their schooling.
Young people still want to play and be creative.
We need to play spaces and playgrounds for young adults - for wellbeing



Encourage alternative learning and streams of unconvential study



LOCAL LEARNING OPPORTUNITIES

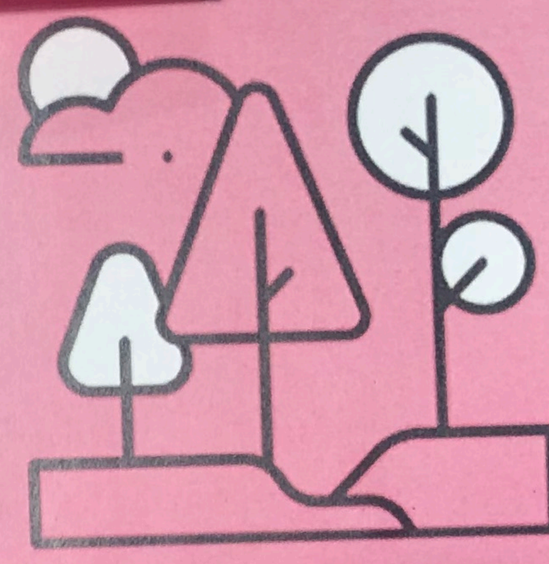
Hands on learning

More free workshops that is hands on because a lot of people learn through this.

more spaces like the botanic gardes.
Smaller areas throughout the city and further kid focused, parks

Nature parks that are physically accessable to all especially transport!

More first Nation spaces and areas we can learn from



OPEN SPACE AND RECREATION

Equipment to hire/borrow to be active or help us.

Leisure
-sensory spots for people, like in shopping malls, parks, museum/art gallery

more free shit to do

community places like art spaces

Bring back what we've lost → environment + native.

MORE WATER FOUNTAINS (FOR DRINKING + BOTTLE REFILLS)

More area that has lighting so that at night time it feels safe to be there.

Less smoking areas

SAFER STREETS AND SPACES

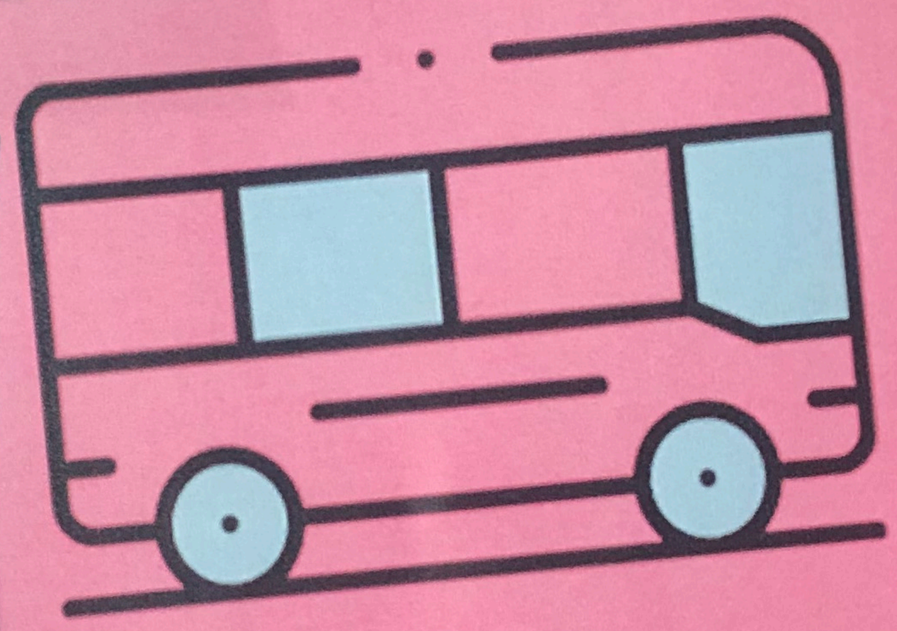
More drug/substance abuse support & safe spaces

Safe using spaces - so people can be safe.
Dedicated smoking zones with ash trays & seating, so people don't litter or affect non smokers

More bike-friendly and safe roads and paths

MORE NON-DIGITAL + EASILY ACCESSIBLE BUS TIMETABLES (THEY ARE HARD TO READ!)

Easily accessable place for people to recharge metro-cards



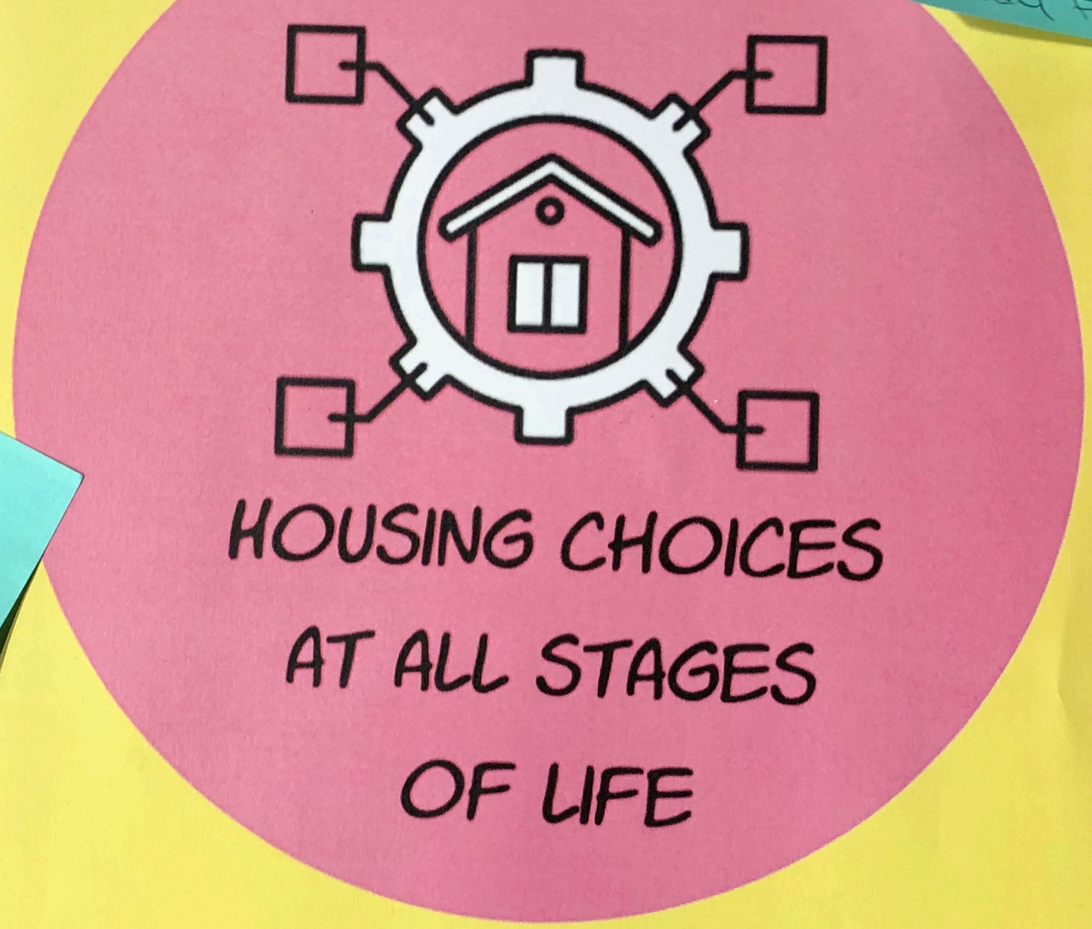
PUBLIC TRANSPORT OPTIONS

Public transport

- Access consultant (from disabled people)
- more regular + consistent buses/trains

Jobs

- more lived experience roles



It's very difficult for people that are new to renting to have previous refrences, we need to find a way for this

Housing
- communal living; many houses on one block for groups of friends or extended families to share. Shared gardens, outdoor areas, easy to access or friends.

We need houses that allow our pets so we dont have to give them up or risk homelessness

MORE SUPPORT FOR YOUTH LIVING IN THE CBD

More job/pathway options
- more options for people to get experience

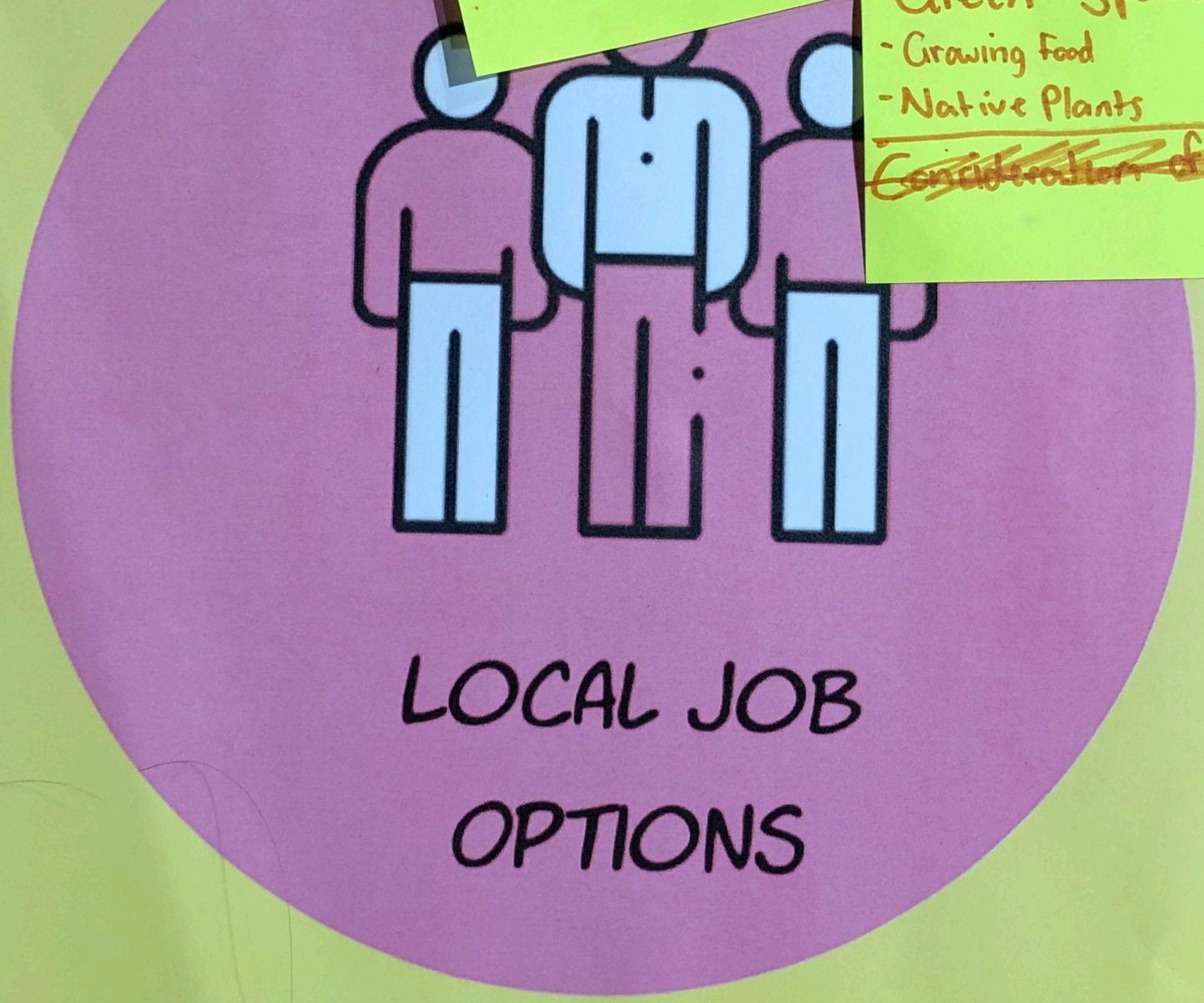
Less unpaid pathways

Better/More Thoughtful Consideration of Enviromental Impact when building new Infrustructure

More flexible hours + work conditions

More shared "Green" Spaces
- Growing food
- Native Plants

~~Consideration of Enviro. Impact~~



Rent Caps

Also Property Caps:

3 per person idk

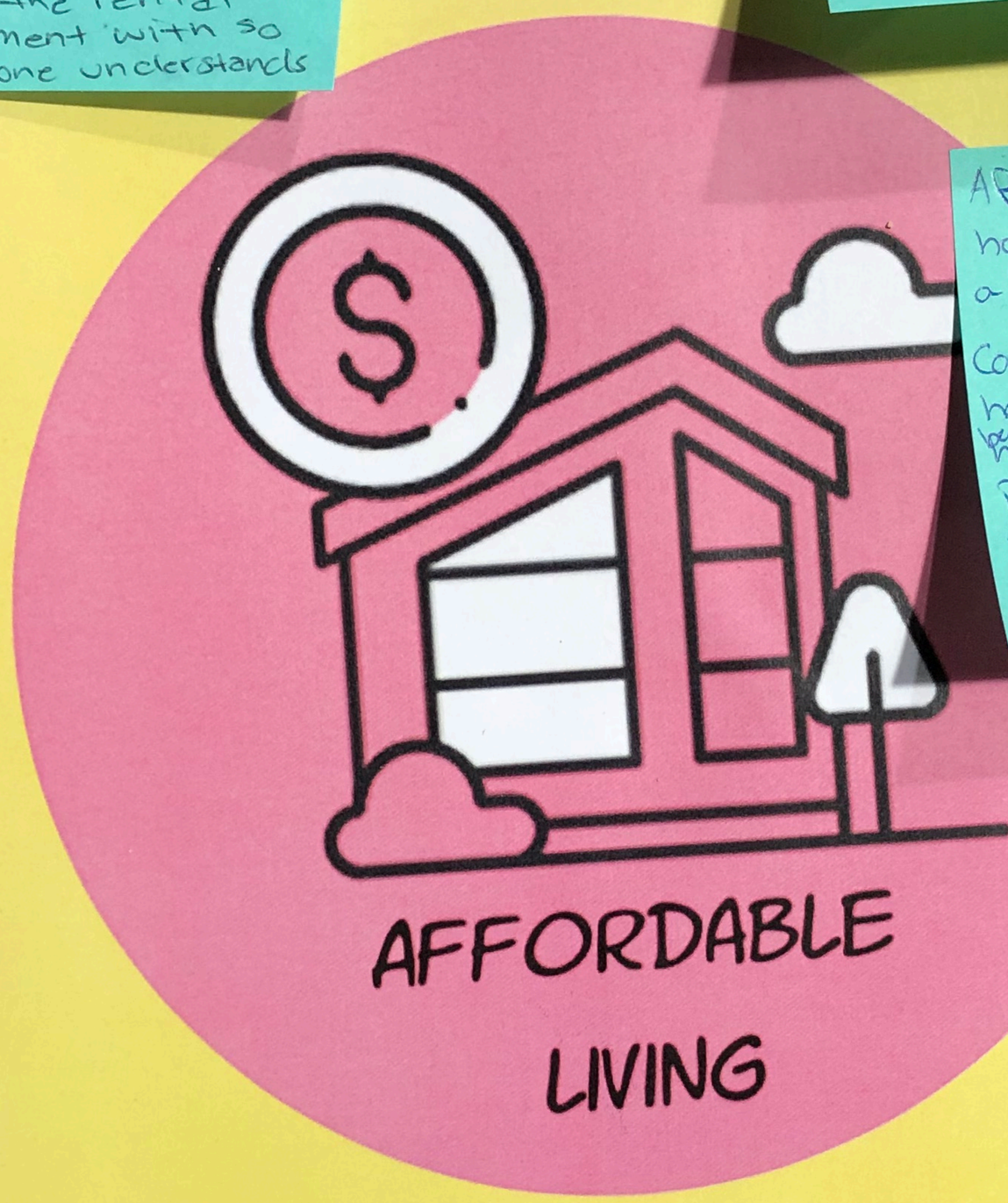
Employers to have better understanding of disability

Employers to be more strengths based

Support for new renters

- support with paper work
- rental assistance
- someone to help read the rental agreement with so everyone understands

MORE SUPPORT FOR HOME LEANES, ESPECIALLY IN YOUTH



Affordable/Accessable housing needs to be a human right

Countries like Finland have demo'd that providing basic housing for youth can Reduce the economic impact on communities

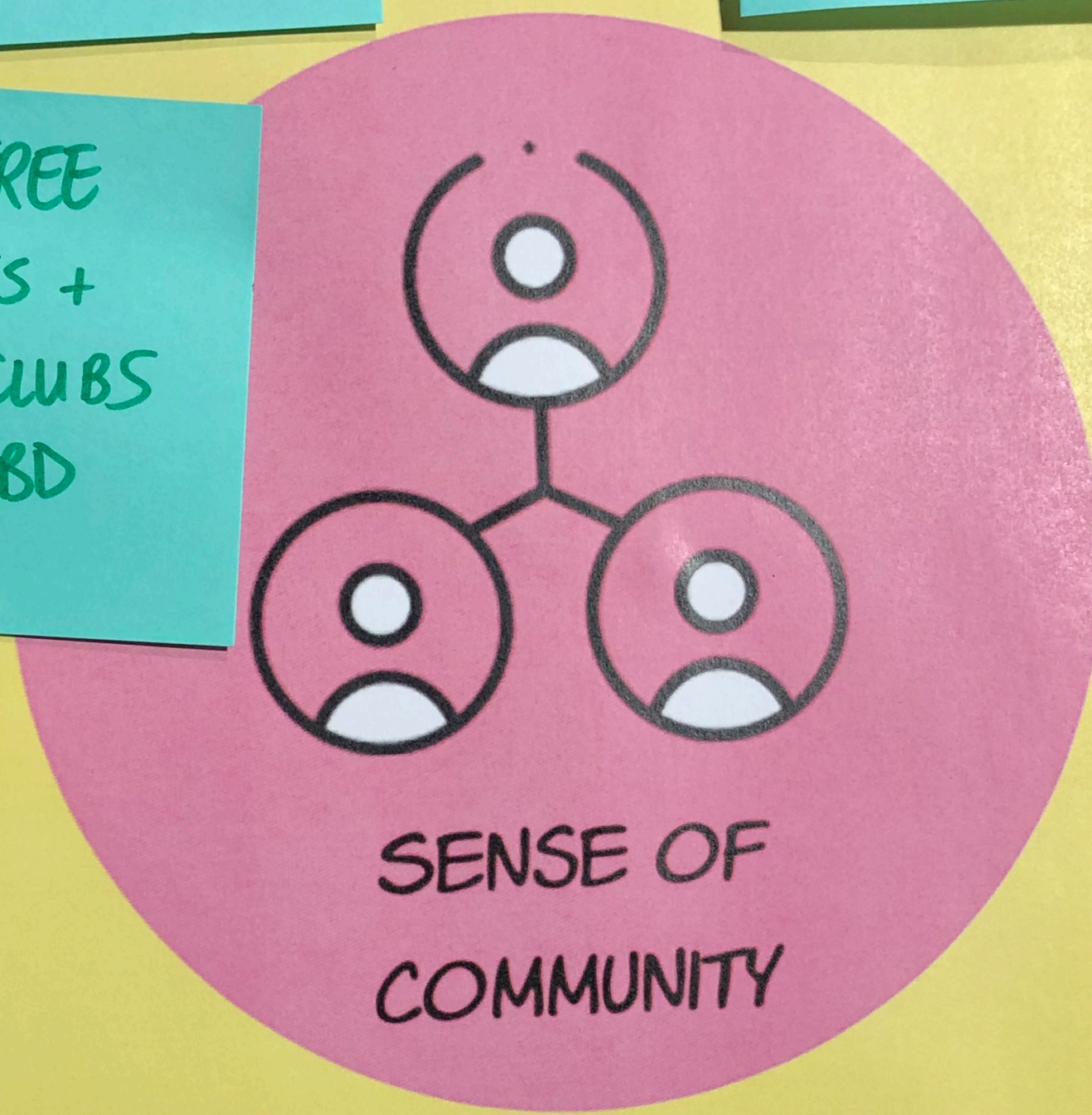
More support + safety for homeless people

More queer, neurodiverse and disability welcoming spaces

More spaces for minors of those groups to hang safely

All age group inclusive activites. Help us meet new people!!

MORE FREE ACTIVITIES + GROUPS/CLUBS IN THE CBD

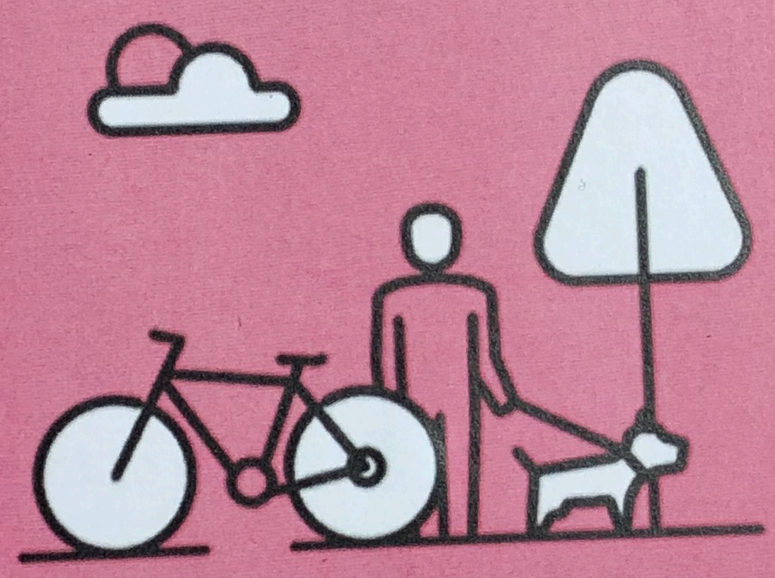


More community workshops. Help us to connect and grow new skills

MORE COMMUNAL SPACES FOR PEOPLE TO JUST HANG OUT / RETREAT

MORE BIKE LANES + STORAGE/ PARKING SPACES

More walkways/ sidewalks for easier walking



WALKABILITY AND ACTIVE TRAVEL

Areas throughout city focused on people not cars.
walking trails, bike trails, dog parks.

More spaces for Street artist to express themselves.

Community event communication
Need to be better

MORE UNDER 18 EVENTS + SAFE SPACES

Other cities get night time art / lights.
Please bring this here, we have so many amazing artist

ARTS, CULTURE AND EXPERIENCES

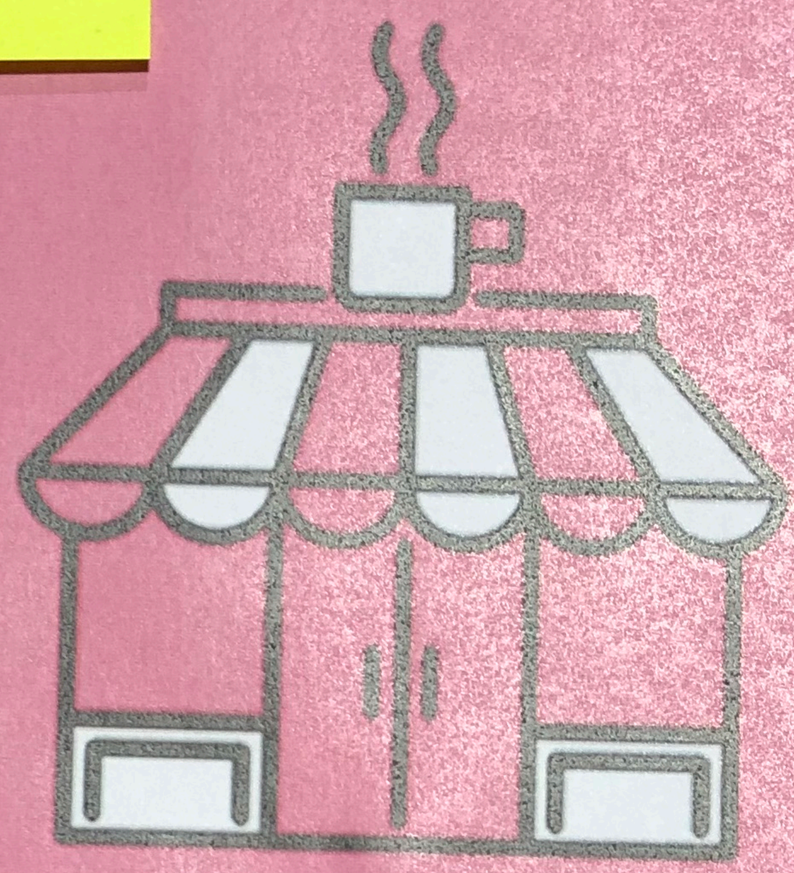
Environment
- more renewable energy
- less reliance on cars → encouraging foot traffic + walkable communities
- pay people to recycle like cans + bottles but for other stuff

Perminent art market Spaces.
Similar to the melbourne markets.
Art, music, food, activitys.

You don't need a festival to have a community like a community art spaces

More mental health support!!

fund services for complex mental health, not just emergency 'quick' support - it leaves vulnerable people struggling. More lived experience support roles.



EVERDAY SHOPPING AND SERVICES

More AFFORDABLE Places to buy food/ eat out in the CBD

More space for local business

2 / Nov / 2023.

1. Have upgraded comunity pin boreds so that small Bussniess can better connect with the community.
-protected by glass you'd go into the shop the bords attached to.
you'd go into the store and ask to display things.

2. Make all service animals allowed to enter shop/store/pubic transport.

3. Change the age limitt for registering a metro card. you don't need to be 18 to own a metro card so why do you need to be 18 to register them?

4. Add posters with pictures/drawings of sings showing intrustions on how to use the busess/trams/buses.

5. pulse button's need at least forghtnightly matinence.

6. the bus numbers on the busses need to be darker for those who are colourbind + vision imared.

7. benches + pluse button's at EACH bus stop.

8. Seprete bus to take to hospitals (for those who's injuries or emergancys don't warrent an ambluance buts still require medical attention).

9. More buses into the country (PLEASE) the contry needs some of the City's resources, help us.

10. More oppitynitys for the youth to be involed in the disisions that affect there lives.

focus on green Spaces through the city. Really makes a difference especially in high density living. (trees, grass ~~flowers, ect~~)

Some comunity Spaces in the hills have free or cheap activitys like pottery, ink art and weeving. This would be great in the city in public Spaces like librarys. not only for kids, for everyone (teens, adults, kids)

Jobs

Work experience help in School. To find a job you need work experience but where do you get work experience? Work! but where do you get work?

Community Spaces / lireing

blocks of houses, apartments or share houses. We are social beings! We need socilisation! Share gardens with fresh food, Day care / kids spaces activitys, arts.

Commarity market Spaces like in melbourne. free rent areas for people Starting out in Small bussnes. Hand made, fresh food, arts, music ect.