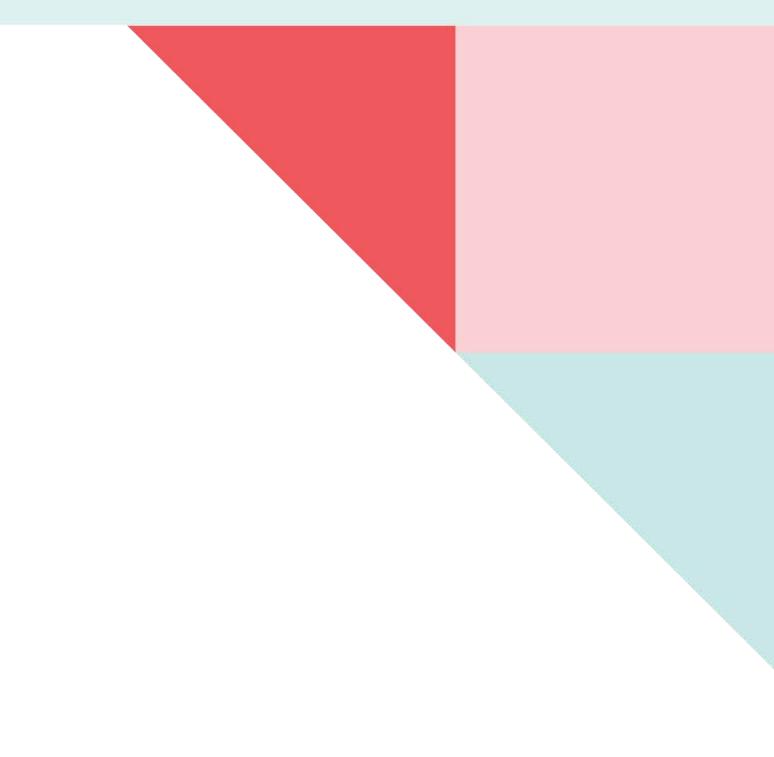
Greater Adelaide Regional Plan Discussion Paper

Council Submissions







DTI:PlanSA Submissions

From: James Szabo

Sent: Thursday, 30 November 2023 9:21 AM

To: DTI:PlanSA Submissions; SA Planning Commission

Cc: DTI:Office of Minister Champion

Subject: Adelaide Hills Council Submission to the Greater Adelaide Regional Plan Discussion Paper Attachments: Adelaide Hills Council Submission to the Greater Adelaide Regional Plan Discussion Paper.pdf

Good Morning,

Following its meeting on 28 November 2023 Council's endorsed submission to the GARP Discussion Paper is attached for consideration by the Commission and the Growth Management Team at PLUS.

Please dispose of the embargoed draft copy that was submitted on the 6th November 2023 to meet the required consultation deadline.

Regards James

James Szabo

Senior Strategic and Policy Planner



w ahc.sa.gov.au

p: 63 Mount Barker Road, Stirling SA 5152



Council acknowledges that we undertake our business on the traditional lands and waters of the Peramangk and Kaurna people. We pay our respects to Elders past, present and emerging as the Custodians of this ancient and beautiful land.

This email (including any attachments) is confidential and intended only for use by the addressee. It has been sent by Adelaide Hills Council. If you are not the intended recipient of this document, you are advised that any use, reproduction, disclosure or distribution of the information contained in this document is prohibited. If you have received this document in error, please advise us immediately and destroy the document. It is noted that legal privilege is not waived because you have read this email or its attachments. Any loss or damage incurred by using this document is the recipient's responsibility. Adelaide Hills Council's entire liability will be limited to resupplying the document. No warranty is made that this document is free from computer virus or other defect.



63 Mount Barker Road Stirling SA 5152 Phone: 08 8408 0400 Fax: 08 8389 7440 mail@ahc.sa.gov.au www.ahc.sa.gov.au

28 November 2023

Mr Craig Holden Chair, State Planning Commission Level 10, 83 Pirie Street Adelaide SA 5000

Via email: plansasubmissions@sa.gov.au

Dear Mr Holden

Adelaide Hills Council Submission to the Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper prepared by the Commission. The Council's submission reflects a keen interest in strategic planning for and affecting the Adelaide Hills Council (AHC).

Council's submission was endorsed on 28 November 2023 and is enclosed.

The submission (Enclosure A) highlights the complex nature of planning in the district, a place of conflicting goals, preferences and aspirations. Conflicts involve issues of residential development, urban encroachment, rural and township character protection, provision of recreation and tourism, and the extent to which state significant assets such as agricultural land, water, biodiversity and scenic landscapes should be protected and enhanced.

From a growth perspective and in recognition of the fragility of the Adelaide Hills environment to over development, the submission takes a precautionary approach to promoting any additional population growth opportunities over and above that already anticipated, while emphasising the need for a stronger focus on ensuring that productivity growth is recognised as key to the district's long term prosperity.

These unique factors that give Adelaide Hills Council its distinction within Greater Adelaide has led to Council seeking recognition as its own distinct region to enable a more bespoke strategic framework. A position paper forms part of the submission which supports this proposal and presents the historical backdrop of planning in the Adelaide Hills since the 1960s, and the evidence of the attributes that differentiate Adelaide Hills Council area from Greater Adelaide.

In order to provide a framework to consider the varying issues and opportunities for the District, three principles were developed to guide the submission:

- 1. Unique: The Adelaide Hills Council is unique in the Greater Adelaide context and requires a bespoke strategic framework that adequately acknowledges our environmental assets and can respond to our inherent risks and vulnerabilities.
- 2. Innovative: We acknowledge that to continue to meet the needs of our community and business sector we will need to build on our strong legacy of innovative approaches that encourage greater housing choice and key industry support.



63 Mount Barker Road Stirling SA 5152 Phone: 08 8408 0400 Fax: 08 8389 7440

mail@ahc.sa.gov.au www.ahc.sa.gov.au

3. Balanced: We support a thriving district that can grow in balance with the natural environment and infrastructure capacity, informed by regenerative and circular principles.

The above principles outline the main thrust of the submission which includes 38 aligned recommendations providing detail and local context. I draw your attention to the following key points:

- To address housing needs in the community it is acknowledged that infill within townships and urban areas is likely to remain the preferred approach.
- The need for a more contemporary heritage and character framework is recommended as the foundation to deliver housing in a sensitive and complementary way.
- The pressure on primary production land from rural residential development across the
 district is highlighted, with the suggestion that contemporary approaches to meeting this
 demand should be considered, coupled with better policy guidance within the planning
 system.
- To support the agricultural industry it is recommended that high-quality agricultural land be mapped in the Regional Plan to provide the basis for a more effective rural policy framework. In addition the recognition of industry clustering, particularly around important viticulture, horticulture and mixed farming areas is promoted.
- Landscape character is highlighted as a key asset that supports tourism and the image of the Adeliade Hills, with a recommendation to have landscape character units formally recognised in the Regional Plan.
- Stronger tree protection laws in South Australia coupled with an expansion of the tree canopy overlay particularly within township and urban zones is considered necessary.
- The creation of biodiversity corridors is promoted to improve connectivity of fragmented areas and better enable the movement of wildlife across the landscape. In addition the reintroduction of local planting guides in the planning system is promoted to ensure locally appropriate species selection.
- Up to date hazard mapping to inform planning assessments is considered necessary to better guide planning outcomes in high risk locations.
- The adoption of a more holistic approach to deliver sustainable buildings with a focus on efficiency, resilience and net zero ambitions is recommended.
- It is recommended that the State undertake investigations into the capacity of key infrastructure within the Adelaide Hills Council to support future investment decisions.

In addition, it is noted that Council has embarked on a new Strategic Plan development process, where issues critical to regional planning will be explored. The new Strategic



63 Mount Barker Road Stirling SA 5152 Phone: 08 8408 0400 Fax: 08 8389 7440 mail@ahc.sa.gov.au www.ahc.sa.gov.au

Plan may aim to provide a longer term strategy to guide future growth and development of the district. This will provide Council with the opportunity to further formalise its position on key issues raised in the submission, informed by targeted community engagement. The timing of this process will provide an opportunity to further guide the drafting of the Regional Plan in 2024.

The Council would therefore request further involvement and input in the ongoing investigations by the Commission relating to the Council and issues and opportunities raised in the submission, including further dialogue on the recommendation to consider regional distinction for the Adelaide Hills. The Council looks forward to the opportunity for further collaboration with the Commission on these matters.



Enc – Adelaide Hills Council Greater Adelaide Regional Plan Discussion Paper Response

cc: Hon. Nick Champion, Minister for Trade and Investment, Housing and Urban Development and Planning, Government of South Australia: MinisterChampion@sa.gov.au

Benjamin Murphy, A/Team Leader, Greater Adelaide Planning, Planning and Land Use Services:

ADELAIDE HILLS

Greater Adelaide Regional Plan

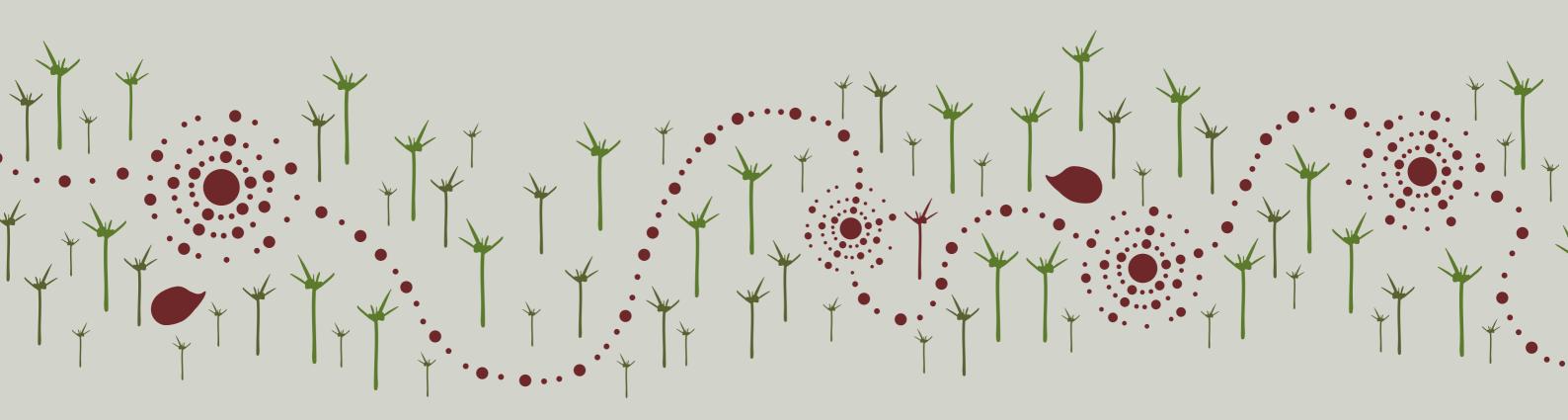
DISCUSSION PAPER RESPONSE



Adelaide Hills

Council acknowledges that we conduct our business on the traditional lands and waters of the Peramangk and Kaurna people. We pay our respects to Elders past, present and emerging as the Custodians of this ancient and beautiful land.







INTRODUCTION

The complex nature of planning in the Adelaide Hills Council (AHC) area cannot be understated. It is a place of conflicting goals, preferences and aspirations. These conflicts involve issues of residential development, the maintenance of rural character, provision of recreation and tourism, and the extent to which regional resources such as agricultural land, water and scenic diversity should be protected and enhanced.

Reconciling these issues is what makes planning in the Adelaide Hills equally complex, challenging and vital. An appreciation of the dynamics of this guides the Adelaide Hills Council's approach to strategic and land use planning and it provides the basis for our understanding of our role within the Greater Adelaide Region.

In this context a common representation of the Adelaide Hills Council is that it is not a population growth area. While this may be comparatively true to say Mount Barker, regional planning provides an opportunity to reflect on the degree of development and investment that has occurred in recent years, and what it says about growth in our district. In a general sense the data is positive revealing steady population increases and a Gross Regional Product (per capita) that significantly outperformed the RDA (AHF and KI) Region. It could be said that the district is flourishing through what has been a challenging period.

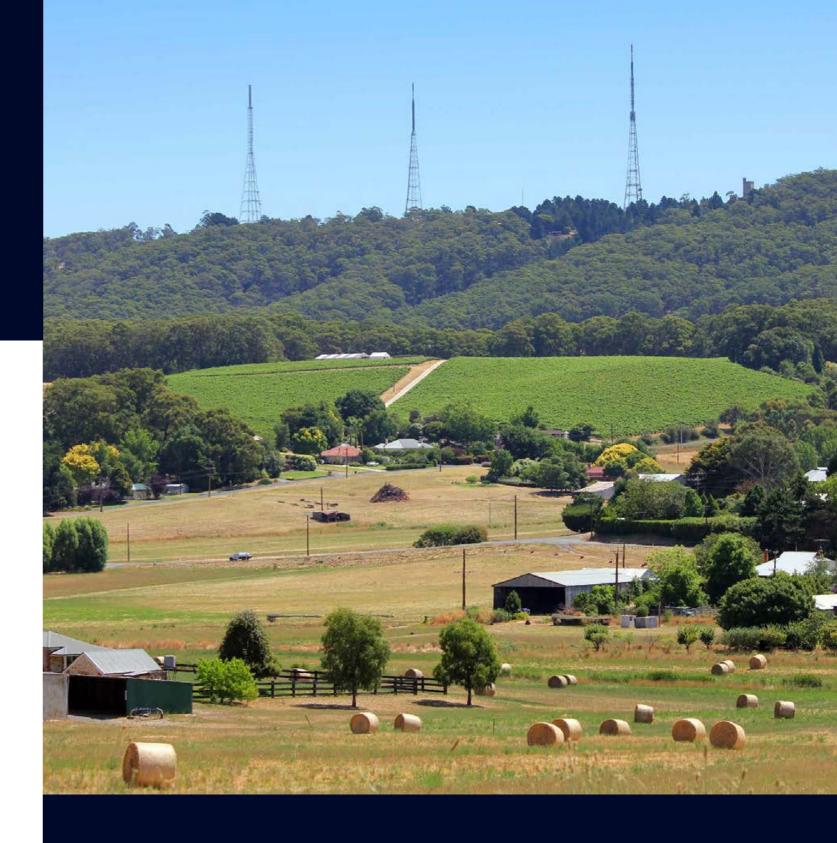
Perhaps this isn't surprising to anyone lucky enough to have observed the Adelaide Hills through its glorious seasons — a procession of growth, change and resilience; the grape and apple harvests in autumn, the rivers and dams in winter, the blossoms on the trees that line the main streets and fill yards in spring and the community's capacity to support each other when disaster hits in summer. This all supports the notion that while not a population growth area we offer something different in the greater Adelaide context - a sum of its unique parts, and much more than simply housing. While the trends

are positive, things can change, and in modern times rapidly. Managing change will be critical consideration of the Regional Plan, and it must aim to deliver a framework that supports the long term liveability, prosperity and sustainability of the district while adequately responding to our inherent risks and recognising and respecting the unique qualities and advantages that make the Adelaide Hills renowned and revered.

Looking to the future this paper highlights key opportunities for the Regional Plan as it relates to the Adelaide Hills Council and the Mount Lofty Ranges region more broadly. Council has summarised its key issues under the themes of **Unique, Innovative** and **Balanced**. A Position Paper has also been developed that supports recommendation 1.2: A Bespoke Strategic Framework.

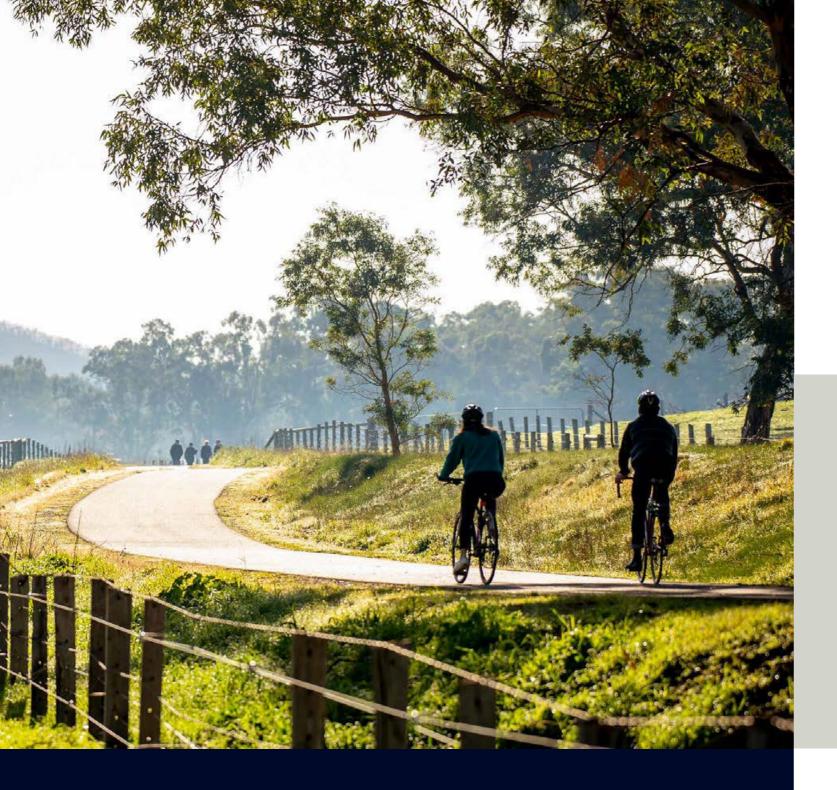
The opportunities highlighted in this paper will strengthen the delivery of shared outcomes sought by both State Government and Adelaide Hills Council, ensuring the long term prosperity and protection of the region while delivering appropriate housing, employment and infrastructure.





"Our aspiration for our exceptional region is to make it easier for our community to prosper while maintaining and enhancing the unique environment, character and livability of our area."

AHC Strategic Plan 2020-24





Unique

- A distinct role in the Greater Adelaide Region
- A bespoke strategic framework
- Recognition of role in key asset protection
- Resilience in uncertainty



Innovative

- Deliver diverse housing to meet community needs
- Protect and support industry and business
- Leverage partnerships to unlock investment









Balanced

- Support a thriving district
- Respecting both environmental and infrastructure limitations
- Embedded with regenerative and circular principles

(



1.1 Distinct role in the Greater Adelaide Region

Context: There are a unique set of circumstances that mean the Adelaide Hills Council's role is distinct within the Greater Adelaide Region.

If the objective of the Regional Plan is to increase economic prosperity and wellbeing then the intrinsic link to land use and infrastructure needs to be explored beyond the current predominant focus on population growth. Without broadening the focus and concept of growth the Regional Plan risks creating perverse and unintended outcomes.

For one, despite proximity to the inner metropolitan area there is no intention to target our Council to accommodate any significant portion of the Region's projected population growth over the next thirty years. This raises some important questions for Council:

- What does a low population growth scenario mean for the future of our district?
- What might this mean in terms of attracting State or Federal infrastructure investment?
- What will deliver prosperity for our community?

The four main factors of economic growth are land (including natural resources), labour, capital (infrastructure) and productivity. Productivity is the process by which we learn how to get more from less: more and better products – new

solutions to meet community needs, produced with less hours or work, fewer resources and a lighter environmental impact. While economic growth based solely on physical inputs (land, labour and capital) cannot go on forever, human ingenuity is inexhaustible. The fragility of the Adelaide Hills environment to over development emphasises the importance that productivity growth, and not just population growth, must be a key strategic focus. This is equally as true for the Adelaide Hills Council as it is for the Mount Lofty Ranges Region more broadly.

In this context it is prudent to note that Council has embarked on a new strategic plan development process, where these critical issues will be explored. The new plan will aim to provide a long term strategy to guide future growth and development of the district. It is considered that the timing of this process presents a good opportunity to feed into and complement the development of the Regional Plan to ensure that it is focused on the unique needs and aspirations of our district.



1.2 Bespoke strategic framework

The Adelaide Hills Council distinction is well articulated by the State's 2016 population projections (Figure 1). Here AHC sits as a wedge of low population growth, within a region on a very different population trajectory. This in addition to the economic imperatives mentioned has led Council to pursue regional recognition. A Position Paper has been developed (see Appendix A) to support this proposal, and it builds on the recent Adelaide Hills Country Cabinet submission, providing the rationale for a bespoke strategic framework and vision for the

Adelaide Hills.

1.3 Recognition of role in key asset protection

In the late 1980's the State Government commenced a strategic review of the Mount Lofty Ranges which delivered water protection, land management and land use policy outcomes (see Case Study 1).

Most notably it resulted in the introduction of the Mount Lofty Ranges Watershed Area. It's establishment came with a strong mandate at a

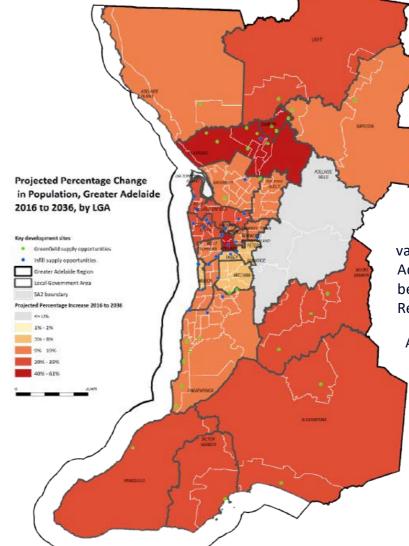
State level, to ensure that the urban areas and township boundaries within the watershed area would not be expanded.

This position was formalised in 2016 with the designation of the Environment Food and Production Areas (EFPA).

These two State led initiatives in addition to native vegetation and landscape character protection are the key limiting factors for residential growth in AHC.

Instead of being viewed as a constraint to growth, the inherent value they provide for the Greater Adelaide Region and the State should be better defined and articulated in the Regional Plan.

As stewards of these assets and in recognition of the role Council plays in their protection and enhancement, it is considered that our community must not be left out of the equation when it comes to State infrastructure investment in the region.





1.4 Resilience in Uncertainty

The full and unknown impacts of Climate Change present a huge risk to the successful implementation of the Regional Planning program and achievement of the desired outcomes.

These risks are acutely heightened in the Adelaide Hills an area predisposed to high natural hazard risks, as well illustrated by Figure 2, depicting the District's susceptibility to bushfires.

Navigating this deep uncertainty requires an adaptive approach. To supplement a bespoke strategic framework the integration of dynamic adaptive policy pathways to guide strategic planning and infrastructure investment under the deep uncertainty that climate changes presents should be considered.

"Sustained action across adaptation and emissions reduction will be required to maintain productivity and fiscal sustainability as well as achieve better social and environmental outcomes"

Intergenerational Report 2023 – Australia's Future to 2063, Australian Government

Innovative Climate adaptation approaches in our Council would complement the contribution the district already makes to climate mitigation, through its high levels of forest and vegetative coverage. If the Parklands are considered the lungs of the City, then the Adelaide Hills could be considered Greater Adelaide's carbon sink.





Figure 2: Fire Scar Mapping for Major Bushfire Events – Source: Department for Environment and Water

Bespoke Strategic Framework

Case Study 1: Mount Lofty Ranges Regional Strategy Plan 1993

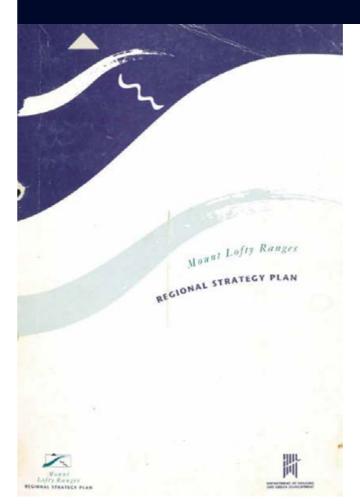
Previous iterations of the 30 Year Plan have focused overwhelmingly on questions of urban land supply and growth management for the metropolitan area with the vulnerable Peri-urban area a secondary consideration.

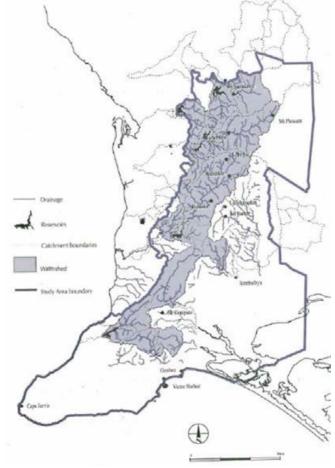
Thirty years ago the need for an integrated, whole-of-government approach to managing the uniqueness of the region was recognised in the Mount Lofty Ranges Regional Strategy Plan.

This was recognised as a dynamic process to be reviewed and updated every three years to ensure that objectives were being achieved and that it was compatible with any changes in issues or attitudes which may have occurred.

While the strategy delivered some positive results for the region it prematurely fell victim to a change in government, council amalgamations and legislative reform.

The challenges that the Strategy sought to respond to are not that different to today, and arguably have been heightened by Climate Change. This process provides a precedent and a blueprint as to how a bespoke strategic framework could be reinvigorated.







Recommendations:

Adelaide Hills Council Supports

A distinct role in the Greater Adelaide Region Recognition that growth in the Adelaide Hills will not be driven by population growth and that the Regional Plan needs to provide equal strategic focus on productivity.

Working with the State to integrate future district plans, master plans and structure plans into the Regional Plan to provide strong local strategic direction.

A bespoke strategic framework

Regional distinction of the Adelaide Hills to enable the delivery of a bespoke strategic framework.

Developing a strong vision to support a thriving district, while maintaining and enhancing the unique environment, character and livability attributes of the Adelaide Hills.

Recognition of key assets

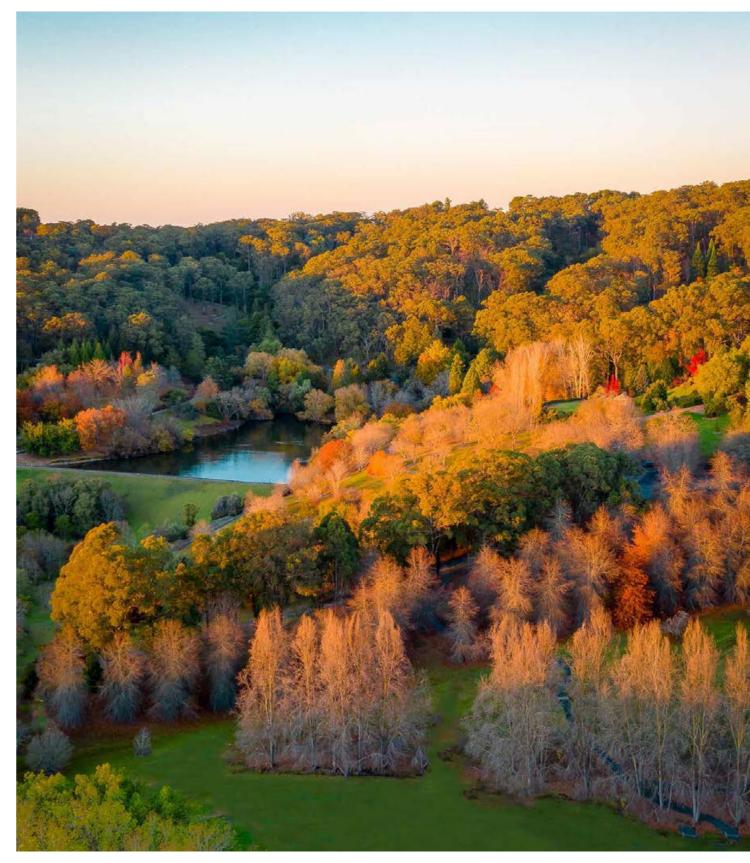
Better recognition of the contribution Adelaide Hills Council makes to the ongoing protection of State significant assets.

Equitable distribution of targeted State funding to support ongoing asset management, as well as supporting local infrastructure and services across the district.

Resilience in Uncertainty

Piloting a dynamic adaptive policy pathway approach to strategic land use and infrastructure planning.

Recognition of climate change mitigation capacity within the Adelaide Hills and defining the role of land use planning in its protection and expansion.





Context: The Adelaide Hills Council has long sought to provide high quality living environments for a diverse range of age groups and household types.

It is recognised that creating a diversity of housing types in locations that are appropriate will assist to maintain a stable population that supports a viable and engaging social and economic environment.

Over the last two decades strategic land use planning initiatives have sought to achieve the following when it comes to housing in our district:

- Maintain population stability and enhance growth by catering for a mix of age groups and a diversity of household types
- Retain existing residents who may be seeking a change in accommodation to match their lifestyle needs, such as people who are ageing and young people
- Protect residential character and amenity
- Promote opportunities for more medium density development in appropriate areas adjacent to retail and community nodes as well as sensitive small scale redevelopment and conversions or additions to create smaller dwellings across the Council area.

The demand for the hill's lifestyle continues to grow, marked by higher medium house prices

than the greater Adelaide median and a growing population that has increased by 2700 (6.75%) in the last 20 years.

This has added an additional 1645 households to the district. Household types are dominated by families and couples, with a growing proportion of lone persons.

The dominant dwelling type remains the detached dwelling accounting for 96% of stock. These houses often contain three or four bedrooms and recent trends indicate they are getting larger.

From 2011-2022 dwelling approvals totaled almost 1400. Of these 60% of were in areas targeted for housing growth with 40% approved in rural zones.



2.1 Deliver diverse housing to meet community needs

Opportunities and Challenges

Housing Objectives

The Adelaide Hill's objectives for housing were given affect through Desired Character Statements within the Adelaide Hills Council Development Plan. These provided a touchstone and policy context to help guide development assessment.

Incorporating the housing objectives for the Council in the Regional Plan, that captures the Council's aims would provide certainty for investors and community confidence in planning and development. It would also provide scope for more bespoke policies to be explored for the Code to provide locally and spatially relevant guidance.



Character and Heritage Framework

The Adelaide Hills landscape is a mosaic of villages nestled within intricate valleys and on undulating ridge lines. Each town and village possess its own physical characteristics and environmental atmosphere arising from the form and growth of their settlement. Collectively each village is part of the image of the Adelaide Hills.

Council is committed to protecting the character and amenity of its settlements and will look to prioritise short to medium term projects to protect additional local heritage items and build a more contemporary framework for character and heritage protection across the district.

This will involve Council exploring additional Character and Heritage Overlays that promote a more contextual and holistic response to the social character, sense of place themes, urban form, landscape character and infrastructure considerations of our township settlements.

Ensuring a robust character and heritage framework provides the foundation to deliver housing diversity in a sensitive and complementary way.





Rural Residential Demand

In the Adelaide Hills rural living provides a very popular and widespread form of residential development. However, the ad hoc proliferation of rural dwellings creates issues; it fragments and takes good farmland out of production, leads to native vegetation clearance, threatens water quality and results in more people and assets in highly bush fire prone areas.

In the last twelve years alone 550 (40%) dwellings have been approved in rural areas. The distribution of rural residential development reveals established clusters south of Stirling, Aldgate and surrounding Mylor, as well as emerging areas like the Piccadilly Valley. But as Figure 3 illustrates the issue is widespread across the district, intersecting with important agricultural clusters at Woodside, Lenswood and Uraidla and Summertown.

Due to the legacy of small farming allotments and demand for this form of development,

compounded by high land values, an aging farmer cohort and farmers selling their land to fund retirement, it seems that without a significant policy intervention at the State level such as Tradeable Development Rights (TDR) – previously attempted during the early 1990's¹, this trend is unlikely to waiver.

Council estimates that there are over 500 undeveloped rural land titles left across the district. Recent trends dictate that a more robust policy framework is required to address this longstanding issue.

It is considered that there should be sufficient policy to guide rural residential toward lower quality agricultural land, and recognition of existing rural residential clusters through appropriate zoning. This could act as receiving areas to support the roll out of a contemporary TDR scheme or at the very least take the pressure off land within agriculture clusters or prime agricultural land to meet this market demand. Ensuring sufficient supply within existing township and urban areas is also an important consideration in this issue, so to innovative models of rural living such as Eco-villages (see Case Study 2).



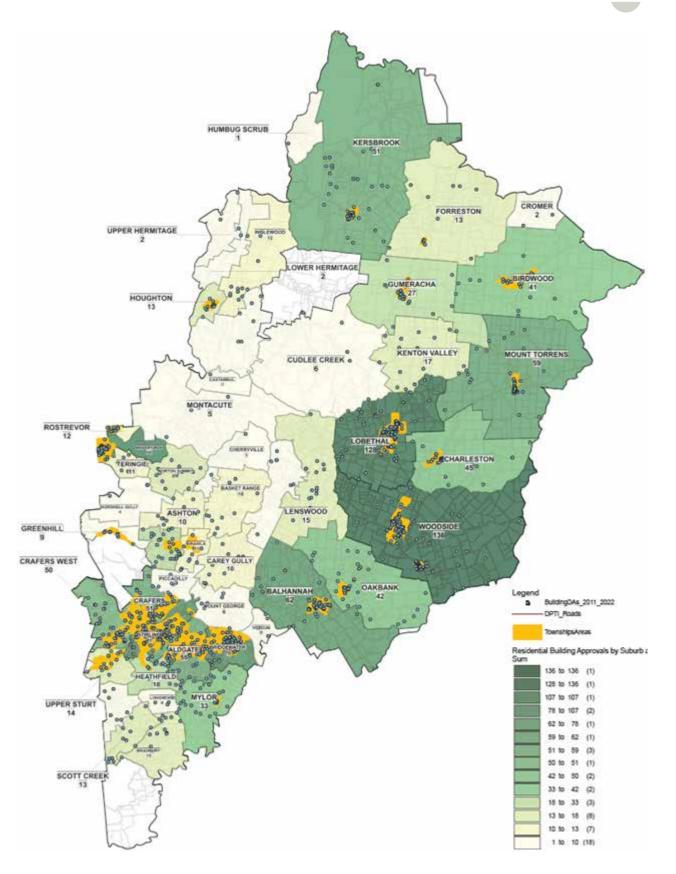


Figure 3: Residential Building Approvals by Suburb and Location 2011-2022 – Source: AHC GIS 2023



Greenfield

The wholesale expansion of existing townships to allow more greenfield development is restricted for reasons already discussed.

However, there are anomalies and opportunities that should be reviewed, particularly when consideration is given to land supply over a 15-30 year horizon.

Inverbrackie

The Crest development at Inverbrackie is one such anomaly. The release of land and housing at Inverbrackie by the Federal Government has resulted in the development of an informal rural settlement.

While the development proponent devised a master plan for the acquired land, it was never rezoned for residential purposes. Rather it sits within a primary production zone, within the Planned Urban Lands to 2045 Boundary,

outside the EFPA, and within the Limited Land Division Overlay.

Given the assorted policy mix over the site a Code Amendment is required to rectify the existing zoning anomaly and to provide a more appropriate framework for development assessment. Should future land be subdivided and released to the market, it would also facilitate a more appropriate assessment pathway.

It is considered that given the context of the site a Code Amendment to rezone the existing Crest development to Rural Neighbourhood or similar would be suitable for a Section 75 Complying Code Amendment.





Summertown/Uraidla

Another anomaly designates 24ha of prime agricultural land located between Summertown and Uraidla Township Zones within the Planned Urban Lands to 2045 Boundary.

Council have approached the State to understand the rationale for this inclusion of land (largely held by Wotton's Cherries), but are yet to receive any clear guidance as to how or why this occurred.



The quasi designation of this land for broad hectare residential development should be reviewed, with the potential for a boundary swap should an appropriate agglomeration of allotments be identified elsewhere within the Council Area.

Strategic

The potential for strategic sites within the Adelaide Hills Council is largely contingent on the decisions of institutions, private landholders or infrastructure investment.

For example, an investigation currently underway into the feasibility of restoring passenger rail services between Mt Barker and the city could have major implications for our Hills towns in which the rail line passes. If realised zoning could be reviewed within the immediate surrounds of a proposed or upgraded station to support transport orientated development.





General

Increasing housing options in existing townships has been the preferred approach to meet housing demand in the Adelaide Hills Council area.

This has involved targeted policy intervention to encourage housing diversity on the periphery of activity centres and throughout townships and urban areas. Innovative options to meet the communities needs will continue to be pursued (co-housing for example).

The five year rolling average uptake rate of dwellings within township and urban areas is approximately 245.

Based on current zone criteria there is potential for additional dwelling opportunities across all township and urban areas. When analysed against historic uptake rates and market drivers, there is a realistic projected gain of dwellings over the next 15 years consistent with the longterm uptake rates.

It is understood that the State Planning Commission will be looking to allocate population growth targets for each Local Government Area.

It is considered that the housing supply analysis undertaken by the Council should provide the basis for determining the baseline capacity for the Adelaide Hills.

It's noted that the State's 2023 Land Supply Report identifies broad hectare allotments as the basis for housing uptake in the Adelaide Hills. An analysis of these sites has determined that most of them are unsuitable for subdivision and should be reviewed before informing any future projections.

The 15-30 year horizon is more difficult to project with any certainty and will be dictated by market conditions, emerging strategic infill opportunities and the next generation of Council's infill policy, all factors of which are currently uncertain.

Case Study 2: Eco-Village Pilot Bellingen Shire, NSW

An 'eco-village' involves designing a community from the outset in such a way as to minimise energy and ecological footprints by maximising the re-use of energy and resources and integrating housing, food, waste and other systems into the basic design and operations of the village².

Recently the Bellingen Shire Council, located on the Mid Coast NSW, saw the potential of this typology to offer an innovative housing option within a rural context, recognising it as such in its Local Housing Strategy 2020.

This action led Council to liaise with a proponent to provide details of an eco-village-style project that would produce exceptional

environmental and social outcomes. With the Council committing to provide support for the alteration of planning controls, as necessary, to facilitate the development of a pilot project.

Funding to deliver the framework was secured from the NSW Department of Planning and Environment, who expressed an interest in exploring the possibility of applying this body of work in other local government areas across the state. To date a draft planning framework has been endorsed and Council is engaging with private landholders with an interest in bringing the eco-village pilot to market.

The exploration of the eco-village model in an Adelaide Peri-urban context is considered warranted. This type of development could meet the growing demand for tree change lifestlyes, particularly where this is being driven by urban migrants. The principles of an eco-village in terms of circularity and regenerative design outcomes would ensure sensitive and complementary integration into the rural context.

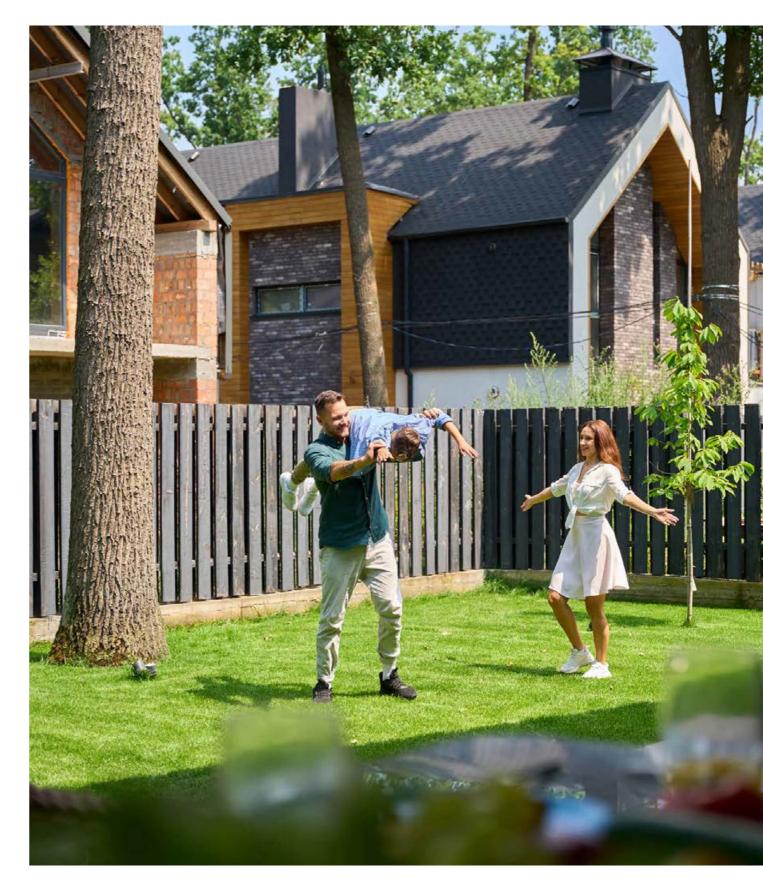






Recommendations:

Adelaide Hills Co	uncil Supports	
Housing Objectives	Working collaboratively with the State to ensure housing objectives f the Adelaide Hills are articulated in the Regional Plan.	
Character and Heritage Framework	Acknowledging the need for additional local heritage place listings.	
	Identifying potential character and heritage areas based on heritage and township survey recommendations previously commissioned by the Council.	
Rural Residential Demand	Working collaboratively with the State to outline a strategic approach and introduce a policy framework and/or incentives that can effectively guide rural residential development away from highly productive agricultural land and important industry clusters.	
	Recognition of existing rural residential agglomeration as a pathway to explore the application of Rural Living Zones or Subzones.	
	Working collaboratively to explore the potential of innovative rural housing options such as Eco-villages in the outer metropolitan and Periurban context to meet 'tree change' demand.	
Consultinal	Consideration of identifying the Crest development at Inverbrackie for a s75 Complying Code Amendment.	
Greenfield	Review the Planned Urban Lands to 2045 Boundary between Summertown and Uraidla.	
Strategic	Intergenerational State infrastructure investment that has the potential to support Transport Orientated Development in strategic locations.	
General	Identifying opportunities for spatial policy refinement in the Planning and Design Code to facilitate innovative housing.	
	Council providing realistic dwelling uptake rates as a critical input for any growth target allocations in the Adelaide Hills.	





2.2 Protect and support industry and business

Context: The Adelaide Hills Council has long had a strong strategic focus on supporting key industry within the district.

Agriculture and Tourism underpin the economy in the Adelaide Hills and these two sectors have been a particular area of focus for planning reform.

This has lead to increased investment in value adding and rural business diversification, as well as adaptation measures such as the roll out of protective tree netting.

Locally the horticulture, viticulture and tourism sectors have all experienced recent growth and the industry signs are positive particularly through what has been a challenging period. However, there remains significant risks at the macro and local level to the long term viability of agriculture and the preservation of rural landscape qualities more broadly.

Despite recent measures namely the introduction of the EFPA, there remains a concern regarding the future of primary production in the region.

Some particular issues relevant include; forms and effects of urban encroachment and hobby farming, impacts of land use conflict and its influence on the 'right to farm' agenda, and a lack of clarity as to whether supportive conditions for food and wine production are being created.

The next regional plan requires a more comprehensive analysis of forces shaping the

district and the Peri-urban region more broadly, including understanding development trends, societal and economic changes, community perspectives, and emerging risks like those posed by climate change and changing economic circumstances for rural businesses.

While planning cannot address all the risks there are opportunities to strengthen the rural policy framework to better respond to the inevitable conflicts between competing preferences found across the rural landscapes of the Adelaide Hills.



Opportunities and Challenges

Protection of High-Quality Agricultural Land

Unplanned and ad-hoc development across the region has resulted in the gradual erosion of agricultural land, undermining both farm competitiveness and landscape integrity.

Presently, South Australia lacks a strategy to manage its crucial food, wine, and fiber production assets, or for assessing its long-term strategic options in this regard. Meanwhile the GARP Discussion paper proposes to expand urban development further into the Peri-urban agricultural areas. The potential constraints caused by this on sectoral growth, tourism, local economies, and the state's self-reliance in food supply cannot be ignored.

While a State strategy does not appear to be on the agenda, a more immediate solution is required to protect agricultural land from conflicting uses.

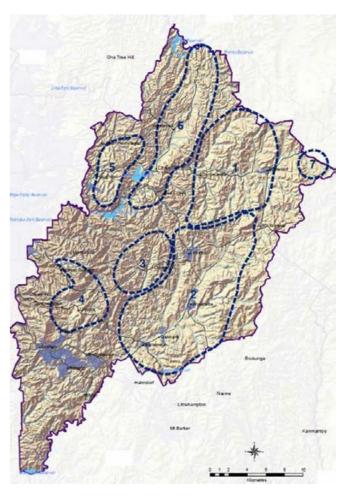
The introduction of land capability mapping within the Regional Plan would be a an effective way to addressing some of the strategic gaps, while building the foundation for a more robust rural policy framework.

The Primary Production Priority Area mapping produced by PIRSA³ provides the evidence base to deliver such an outcome. The need to identify these areas arose because land use policy in South Australia generally fails to differentiate rural land on the basis of its significance for primary production.

It is not uncommon for land with vastly different production potential and strategic significance to be subject to the same land use policies. Without a more detailed understanding of the district's land base for primary production

it will not be possible to manage key assets or to understand strategic options in an objective manner. PIRSA developed the Primary Production Priority Areas project to identify areas of primary production significance in the Greater Adelaide region.

For the Adelaide Hills this study identified seven priority areas. Despite the introduction of the EFPA, the Planning and Design Code does not differentiate these areas from other rural land. It is worth noting that areas two, three, four and five contain a large portion of the horticulture and viticulture industry where recent investment clustering has emerged (see Case Study 3).



Generalised priority area units in the AHC. Source: PIRSA 2011.



Industry Clusters, Fragmentation and Interface Management

It is considered that the planning system is failing to adequately support and protect primary production operations from the encroachment of incompatible uses.

From a planning perspective, three primary challenges emerge in this area. Firstly, there's mounting pressure on agricultural operations due to the encroachment of rural residential development and other sensitive uses into agricultural zones.

Secondly, changes in the planning and design code have led to challenges in assessing development, notably from land division, increased tourist accommodation, and valueadding expansions.

Lastly, preserving the unique landscape character of Peri-urban areas, essential for their productivity, desirability, tourism appeal, and ecological significance, is at risk due to increased development opportunities allowed by the planning and design code.

Addressing these challenges may necessitate a more nuanced approach to rural planning policies, emphasizing land productivity, infrastructure, and environmental sensitivity to foster a localised and tailored policy framework.

Detailed priorities are provided below to highlight on the ground issues:

 The need for recognition of existing diverse industry clusters as distinct from other primary production areas to protect and promote agglomeration, recognise

- contribution to tourism and guide infrastructure investment
- Greater direction and policy to discourage nuanced issues relating to farmland fragmentation particularly where boundary realignment is concerned
- Ensure rural diversification policy is appropriately geared to support the long-term sustainability of primary industry. For example recently tourism accommodation proposals for multiple units with no discernible link to primary production are increasing. In the absence of clear strategic guidance and a strong policy framework to better guide these proposals they are slipping through policy gaps within the code
- The encroachment on primary production land and the subsequent impacts to land capability and interface issues with genuine primary industry operations is not well understood individually or cumulatively
- Interface between land use policies are being called up inconsistently in the code for relevant land uses in the Productive Rural Landscape Zone and are inflexible in capturing the varying land use conflicts found in the Peri-urban region.



Case Study 3: Adelaide Peri-urban Project (APP) Pilot

Over the last 18 months planners from Peri-urban Councils have been assisting University of Adelaide researchers to examine scope for collaborative projects that inform planning for development and management of rural landscapes in Adelaide's Peri-urban region.

In order to test how such collaborations might operate in practice, a pilot project is being developed that examines farm value-adding and rural business diversification activity over recent years, and the current treatment of that topic in planning policy.

Stage One of the pilot project, which has been reviewing development applications for these forms of activity during the period 2016-2021, has revealed the following trends⁴:

- There has been significant growth in the number of development applications following introduction of the Code
- Applications are dominated by proposals for rural business diversification projects
- In contrast, there have been relatively few applications for farm value-adding projects, which retain a direct connection with local on-farm production

- Over the time-frame of the project and across the study area, applications have been dominated just by a handful of development types, namely, tourist accommodation (98), wineries (80), cellar door shops (64), function centres (28) and restaurants (24)
- Preliminary mapping of the data (see below) suggests possible formation of 'clusters' that may require planning policy or other interventions to reconcile competing objectives.

This pilot project has demonstrated the value of collaborative research to inform planning policy development and strategic priorities in what is a complex planning environment.





Landscape Character

The landscape character value is intrinsically linked to all aspects of the Peri-urban region, in particular the tourism sector.

Some Councils have initiated processes to identify their significant landscapes, but its acknowledged that this is a complex task that in some cases requires regional collaboration.

One such attempt occurred in 2015 in support of the joint Mount Lofty Ranges World Heritage Bid. The Mount Lofty Ranges Landscape Quality Assessment⁵ project sought to qualitatively measure and map the scenic quality of the Mount Lofty Ranges region.

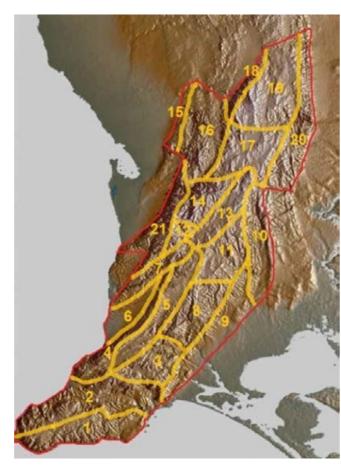
The study area stretched from Cape Jervis in the south to Truro in the north, east to the Palmer escarpment and west to include the Hills Face Zone. Twenty-one landscape units were defined across the Ranges, with these areas having similar features and characteristics.

The study identified a total of 21 unique landscape units across the region. It is noted that, the code does not recognise these landscape units.

Recognition of landscape units within the Planning system will facilitate a more holistic response to the important attributes and features that define the region.

Ideally Planning policies could acknowledge and reflect the differing predominant characteristics of the general landscape units that comprise the district and this would guide the nature and scale of development between the varying units in order to protect existing characteristics and landscape features.

Other important landscape considerations include the designation of scenic routes, identification of lookouts and recognition of gateways.



Approximate Landscape units in the Mount Lofty Ranges. Source: MLR Landscape Quality Assessment, 2015.







Main Street Concept Plans

Council recently developed design guidelines for the Stirling and Crafers main streets to define important character precincts and identify areas for renewal.

The guidelines allow the Council and property owners to identify potential opportunities and new partnerships which will enable a coordinated approach to be undertaken when redevelopment occurs. The documents can also be used to guide the Council's public infrastructure investment decisions.

The guidelines may also influence the State and Council planning policy and encourage further economic development opportunities and investment. The documents can also be used to identify the requirement for feasibility studies, guide future investigations or guide further detailed concept plans.

For Stirling the analysis revealed that there are distinct precincts within the Stirling Village Mainstreet, each with a different design, landscape and development potential. The precincts form the basis of the Stirling Village Mainstreet Concept Plan (image opposite) and recommend responsive design actions that reflect improvements to movement and access, increased community provisions and new development opportunities, as well as identifying new open spaces, laneways and plazas.

For Crafers design principles, objectives, detailed guidelines and actions have been developed to illustrate how the built form, access and movement, as well as the public realm of Crafers can be delivered and how future development will contribute to the overall vision for Crafers.

Central to the guidelines is the Crafers Village Concept Plan. The concept plan represents potential of the village and explores future opportunities associated with urban character, open space and landscape amenity.

The concept plan is structured and expressed in several planning and urban design layers. Each layer demonstrates specific responses and potential opportunities in relation to:

- Built Form and Land Use
- Pedestrian Access and Cycling
- Vehicle Movement and Parking
- · Open Space and Community Use.

It is considered that the concept plans developed as part of these two projects should be integrated into the Regional Plan, as a means to elevate their status in the planning system and guide development and investment outcomes that respond to important local considerations and expectations.







Recommendations:

Adelaide Hills Council Supports

Protection of High-Quality Agricultural Land Prioritisation of a State-led strategy to manage its crucial food, wine, and fiber production assets.

Primary Production Priority Area mapping embedded in the Regional Plan as the basis to build a more nuanced policy framework.

Industry Clusters, Fragmentation and Interface Management Identifying agricultural industry clusters in the Regional Plan as a basis to inform a more nuanced policy framework to deal with issues of fragmentation and interface management.

Ongoing research collaboration with adjoining councils, Adelaide University, RDA's, Landscape Boards, Industry Bodies and PLUS to inform strategic prioritisation and policy development across the agricultural landscapes of the Mount Lofty Ranges.

Landscape character unit mapping being embedded in the regional plan as a basis to develop a more nuanced policy framework for the rural landscapes of the Mount Lofty Ranges.

Landscape Character

Identifying scenic routes, lookouts and gateways in the Regional Plan as a basis to support policy criteria to guide appropriate development outcomes in scenically important areas.

Main street Concept Plans Integration of the Stirling and Crafers Concept Plans in the Regional Plan to guide investment and development outcomes within these important main street settings.





3.1 Environmental Considerations

Context: The Adelaide Hills Council supports a thriving district and this is well articulated in Council's Strategic Plan – A Brighter Future 2020-2024.

While the pursuit of a prosperous future drives Council's strategic priorities, there is a clear understanding that any efforts must respect the natural limits of the district. This includes biodiversity, conservation careful watershed management, holistic adaptation to natural disaster risks and an efficient and resilient building stock.

The Adelaide Hills continues to nurture a diverse natural ecosystem with numerous threatened species and communities. The region is sensitive to possible biodiversity threats now and in the future and requires ongoing management to preserve and regenerate its habitats.

The watershed remains a key asset for the entire Greater Adelaide region, particularly in the context of the State's aspirations for population growth.

Natural disasters will come to define the Adelaide Hills over the next century, how we adapt to this threat is critical.

An efficient and resilient building stock will be critical to ensuring the wellbeing and quality of life for our residents is maintained.





10 Star Home by SUHO— Hamilton Hill. Photo Credit: Sustainable House Day.

Issues and Opportunities

Tree management

Urban canopy is critical for mitigating the urban heat island effect, but despite strong efforts from local governments who have been planting tens of thousands of trees each year, Adelaide's overall canopy is declining. The primary cause of this decline is tree removal on private land driven by urban infill, storm damage and bush fire.

Currently, South Australia has the weakest tree protection laws of any Australian state, which protects only the largest trees, has a myriad of exemptions that voids protection for many of those trees. This means that the easiest default for any developer, is to remove trees on a site rather than attempting to retain them. These issues are compounded by the intersecting clauses of the PDI Regulations and the *Native Vegetation Act* which creates a complex scenario for proponents and relevant authorities to navigate as part of the Development Assessment process.

Biodiversity

The creation of biodiversity corridors is necessary to improve connectivity of fragmented patches and better enable the movement of wildlife across the landscape (See Case Study 4).

Local planting guides providing local guidance for proponents to assist with landscaping design and species selection is missing in the Code. In the Adelaide Hills there are important considerations for species selection including potential for weed invasion, endemic and local natives and fire resistance. The Regional plan presents an opportunity to recognise the diverse environments found across the region.





Native Vegetation Coverage (Light Green) in the AHC. Source: Nature Maps SA.



Water Security

The Mount Lofty Ranges Water Catchment provides a majority of Adelaide's drinking water and will increasingly become an important resource to support the growth of the region.

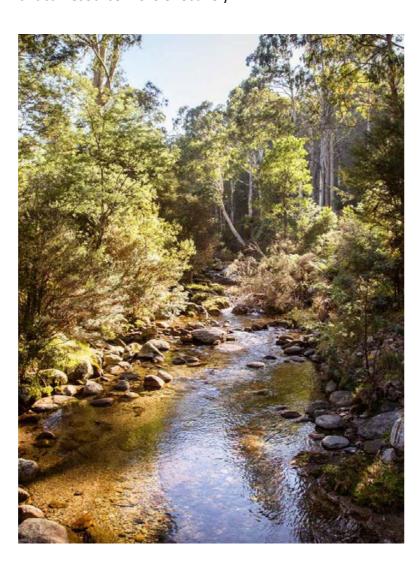
Since the early 1990's following the implementation of the Mount Lofty Ranges Planning Strategy a strong land use planning and management program driven by State Agencies, various Boards, councils, communities and private landowners across the catchment have sought to protect this vital resource.

Despite the sustained effort over the preceding thirty years there remains concerns over water security in terms of quantity and quality but also the health of the overall catchment environment that water so critically supports. The Hills and Fleurieu Landscape Board recently published a water resources summary as part of the Water Allocation Plan (WAP) review⁶ and it provides a timely snapshot in understanding the pressures faced by the catchment. The analysis of long-term monitoring has found:

- An overall trend of decline in rainfall and streamflow
- The frequency of wetter-than-average rainfall years is considerably lower across during the last decade compared to pre-millennium drought years
- Of the eight catchments, five have total allowable use volumes (surface water) that exceed the sustainable take limits, and
- Ecological monitoring of native fish, waterbugs and environmental flows across the Western Mount Lofty Ranges shows a clear picture of declining conditions.

Compounding this a recent study by the EPA found that pharmaceutical, personal care products and herbicides are prevalent in receiving waters across the catchment⁷. The impact that these chemicals have on the aquatic ecosystems is not well understood but has the potential to cause adverse chronic effects or biomagnify up the food chain.

The Landscape Board Water Allocation plan review and the SA Water Resilient Water Futures project presents a rare opportunity to integrate and complement the strategic objectives across the related State Agencies and Boards and work with councils and landowners to manage this critical resource more effectively.



Case Study 4: AHC Biodiversity Corridor Linkages Project (2017)

The Mount Lofty Ranges have been identified as one of 15 National Biodiversity Hotspots by the Australian Government.

In the Adelaide Hills Council region, remaining native vegetation cover is estimated at approximately 17,265 hectares, which is 21.7% of the total council area. This widespread clearance has resulted in habitat fragmentation, with populations of plants and animals that are isolated from each other.

It is vital to the region's wildlife that ongoing land management focuses on retention and restoration of remaining native vegetation, as well as re-establishment of wildlife habitat through revegetation with local provenance species. The value of wildlife corridors, or 'biodiversity corridors', to aid biodiversity on a landscape scale has been well documented.

The creation of biodiversity corridors is necessary to improve connectivity of fragmented patches and better enable the movement of wildlife across the landscape.

Corridors minimise the risks associated with small patch size and isolation and aid species recovery from catastrophic events by enabling species to relocate to other patches of suitable habitat.

These fragments are increasingly susceptible to impacts from the surrounding land use,

such as housing, weed incursion, chemical spray drift and agriculture.

This project identified four areas across the region where biodiversity corridors could significantly augment existing conservation efforts.

This mapping could be used as a basis to develop a Biodiversity Corridor Overlay in the Code, which could provide a means to prioritise native vegetation conservation and promote revegetation using locally appropriate species.



Adelaide Hills Biodiversity Corridor Zone 1. Source: AHC GIS



Natural Hazards

The Guide to climate projections for risk assessment and planning in South Australia demonstrate that the Adelaide Hills Council is highly exposed to the risks associated with a warming climate.

This will require tough planning decisions to be made over the next century. The Natural Hazards section on page. 50 of the Discussion Paper reaffirms the need to not only direct development away from high-risk areas, but also to ensure enough land and housing supply and options for people to live in locations where they can avoid hazards is available.

In terms of directing development away from hazards in AHC, it is noted that under a high emissions scenario 79.6% of properties in the Adelaide Hills Council will be at a high risk of being uninsurable by 2050 due to exposure to bush fire and flood events⁸.

For the most extreme risk areas a conversation needs to be had about whether managed relocations are a necessary consideration as emission scenario thresholds are passed over the next century.

The need for a more robust approach appears necessary, as recently evidenced by the Cudlee Creek bush fire recovery, which saw 85 homes destroyed, with many being rebuilt without the need for a CFS Referral where they were deemed to be Medium Bushfire Risk.

Efficient and Resilient Buildings

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.

Building more resilient new homes and retrofitting existing homes will also be another important consideration for our district. A recent study commissioned by Resilient Hills and Coasts, found that the average home across the region has a poor resilience rating.

The Where We Build What We Build⁹study encouraged building or retrofitting of homes that are climate-ready, by demonstrating that the benefits of doing so outweighed the costs.







Recommendations:

Efficient and Resilient

Buildings

Adelaide Hills Council Supports:				
Tree Management	Increasing the application of the Urban Tree Canopy Overlay to the Township Zones within Adelaide Hills Council and the types of development the Overlay applies to.			
Diodiversity	Identifying the opportunity for Biodiversity Corridors in the regional plan as a basis to develop a more nuanced policy framework to respond to the threats to biodiversity and to assist with habitat restoration at a landscape scale.			
Biodiversity	Reintroducing local planting guides in the planning system, to be embedded via the Planning and Design Code and applied spatially.			
Water Security	An integrated whole-of-government approach to managing the water resources of the Mount Lofty Ranges and shared targets.			
	Up-to-date hazard mapping to inform planning assessments.			
Natural Hazards	Exploration of dynamic adaptive policy pathways approach to respond to different climate change scenarios or where unprecedented extreme events require re-evaluation of current adaptation approaches (i.e. as occurred following the Black Summer Bushfires).			

Exploring an opportunity 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, net zero ambitions and best-practice outcomes.





3.1 Infrastructure Considerations

Context: The District has 1,278 km of roads, of which 20% are managed by DIT. Of roads managed by Council 46% are sealed and 3.5% are tracks only.

Major road transport issues include narrow roads unsuitable for heavy transport, conflict between tourist, resident and commercial traffic, local flooding over roads, and a need for a north-south route suitable for heavy transport.

The main pressures on local roads are as a result of grape, vegetable, mineral water and milk transport to the City, animal transport to the abattoirs in Lobethal and Murray Bridge and tourist traffic.



A single rail line traverses the Hills from Upper Sturt to Mt Barker Junction, and carries about 4.8 million tonnes of interstate rail traffic from Melbourne, Perth, Darwin and regional SA.

The line is too tight and steep for modern length carriages which results in wheel squeal in corners The Overland passenger service to Melbourne uses this line, but there are no local passenger services, however this being explored by the State Government.

Apart from the Stirling - Aldgate - Bridgewater area, the District is not well serviced by public transport due to its small and widely dispersed rural population. Adelaide Metro run services into the main population centres, and private operators run services through the northern district into Tea Tree Plaza and Tanunda.

The District is generally well serviced for mobile phone and internet services. The topography and dispersed settlement pattern create black spots that require additional investment.

Electricity supply into the District is generally well developed and reliable. Major transmission lines cross the Council area and run along the western face of the Mt Lofty Ranges.

Annually, household garbage and recyclables removal costs \$5.5m.

Waste Water

Council operates a waste transfer station at Heathfield and there is a private waste transfer station located in Woodside.

Waste Water treatment and management issues include constraints in providing infrastructure due to the District's topography and dispersed settlement pattern and a large portion of septic tank systems being faulty, causing discharge of waste water into the environment which impacts on water quality within the Watershed.

A large portion of the Adelaide Hills Sewer Program has been completed in the Stirling, Aldgate, Bridgewater, Crafers, and Heathfield urban area. Gumeracha, Balhannah, Oakbank, and Lobethal are also sewered. Rostrevor, Woodforde and much of Teringie are also sewered.

High-priority areas for future sewage

infrastructure programs are unsewered townships and settlements in environmentally sensitive areas, where on-site systems are currently failing.

Council operates CWMS systems in Birdwood, Charleston, Kersbrook, Mt Torrens, Verdun and Woodside. Such schemes are being investigated for Houghton, Inglewood, Mylor, Summertown and Uraidla. In many cases, no economies of scale exist due to the size of the settlements involved.

Council's stormwater is mainly managed via natural overland flows and a limited pipe network in urban areas. Creeks, watercourses and dams are controlled by the Landscape Board.

In summary, the District has good power, internet and mobile communications, but has poor public transport service, numerous minor and agricultural roads to maintain, and strained sewerage services with numerous local problems.





Issues and Opportunities

Infrastructure

Infrastructure Schemes are one delivery tool to ensure infrastructure for local communities and the state. These schemes have not always served the Adelaide Hills population well and new tools to invest better in township and rural areas are needed.

Waste Management

Waste and resource recovery industry are intrinsically linked to logistics and the transition to a circular economy and the increased diversion of food waste from landfill will require a specific focus on strategic transport and infrastructure development. Policy needs to be included in the Plan to support this.

Council supports the transition towards a circular economy as the focus of the waste strategy. A circular economy (as far as practicable) presents the opportunity to not only stabilise the waste, recycling and resource recovery sector by reducing reliance on overseas commodity markets but also to create jobs, including jobs in regional and rural South Australia, and to provide South Australia with 'practical, on ground action to address climate related impacts.'

The emergence of the circular economy presents opportunities to promote clustering within local employment zones to support these outcomes.

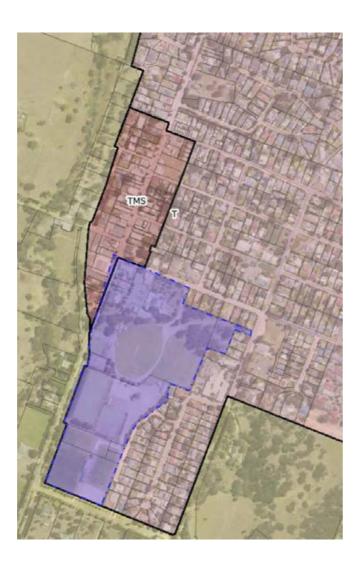
Recreation

Recreation management is guided by Councils Sport and Recreation Strategy 2017-2021 and is currently under review. The District has 10 facilities at a State level, 28 at a regional level, 28 at District level and 109 at the local level.

While not all recreation areas require specific zoning there are state and regional level recreation areas in the Council that would benefit from appropriate zoning to ensure better development process and outcomes.

For example the Woodside Recreation Grounds is a significant recreation and civic area and is currently Zoned Township Zone, which is largely focused on residential development.

Other examples include the Oakbank Racecourse and Golf Club, Balhannah Recreation and Dog Park, Amy Gillet Bikeway, Lobethal Recreation Ground and Bushland Park Mount Torrens Oval and Uraidla Recreation Grounds.







Recommendations:

Adelaide Hills Council Supports

Investigations undertaken as part of the regional planning program to understand capacity of key infrastructure within the Adelaide Hills Council to support any future population targets and investment decisions.

Infrastructure

New tools to ensure infrastructure for local communities and consideration of developer contributions for local infrastructure.

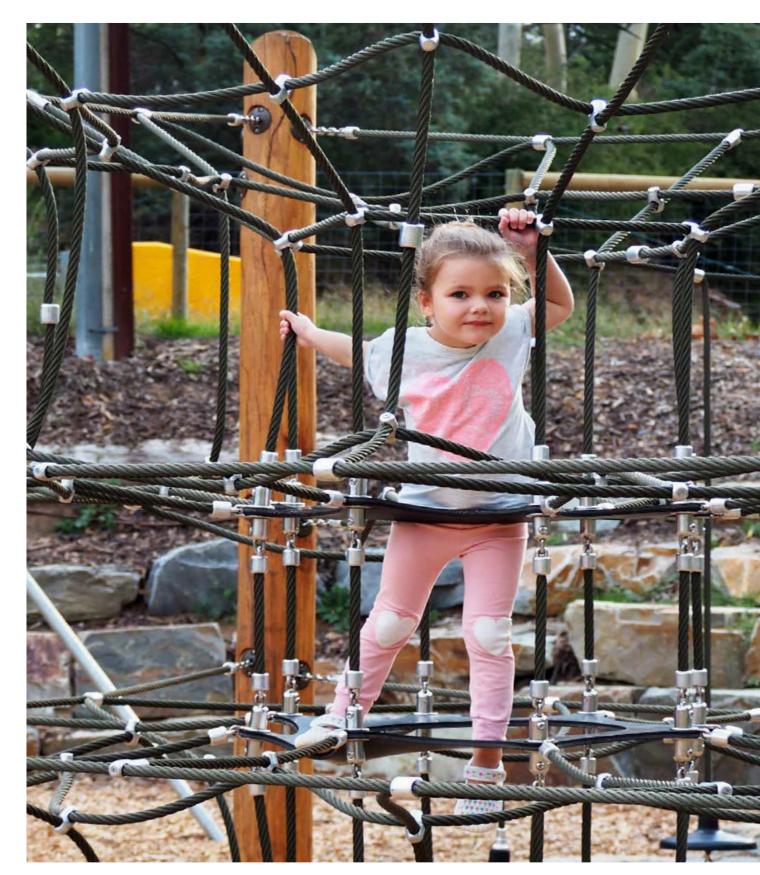
Waste Management

Identification of potential circular economy precincts to promote agglomeration and innovation within Employment Zones.

Consideration of identifying established state and regional level recreation areas (within identified AHC townships) for a s75 Complying Code Amendment.

Recreation

The Amy Gillet Bikeway corridor being recognised in the Regional Plan as an important recreation, tourism and active travel asset.



RECOMMENDATIONS - Unique



Adelaide Hills Council Supports

A distinct role in the Greater Adelaide Region Recognition that growth in the Adelaide Hills will not be driven by population growth and that the Regional Plan needs to provide equal strategic focus on productivity.

Working with the State to integrate future district plans, master plans and structure plans into the Regional Plan to provide strong local strategic direction.

A bespoke strategic framework

Regional distinction of the Adelaide Hills (Mount Lofty Ranges) to enable the delivery of a bespoke strategic framework.

Developing a strong vision to support a thriving district, while maintaining and enhancing the unique environment, character and livability attributes of the Adelaide Hills.

Recognition of key assets

Better recognition of the contribution Adelaide Hills Council makes to the ongoing protection of State significant assets.

Equitable distribution of targeted State funding to support ongoing asset management, as well as supporting local infrastructure and services across the district.

Resilience in Uncertainty

Piloting a dynamic adaptive policy pathway approach to strategic land use and infrastructure planning.

Recognition of climate change mitigation capacity within the Adelaide Hills and defining the role of land use planning in its protection and expansion.



 18

RECOMMENDATIONS - Innovative



Adelaide Hills Co	uncil Supports
Housing Objectives	Working collaboratively with the State to ensure housing objectives for the Adelaide Hills are articulated in the Regional Plan.
Character	Acknowledging the need for additional local heritage place listings.
and Heritage Framework	Identifying potential character and heritage areas based on heritage and township survey recommendations previously commissioned by the Council.
	Working collaboratively with the State to outline a strategic approach and introduce a policy framework and/or incentives that can effectively guide rural residential development away from highly productive agricultural land and important industry clusters.
Rural Residential Demand	Recognition of existing rural residential agglomeration as a pathway to explore the application of Rural Living Zones or Subzones.
	Working collaboratively to explore the potential of innovative rural housing options such as Eco villages in the outer metropolitan and Periurban context to meet 'tree change' demand.
	Consideration of identifying the Crest development at Inverbrackie for a s75 Complying Code Amendment.
Greenfield	Review the Planned Urban Lands to 2045 Boundary between Summertown and Uraidla.
Strategic	Intergenerational State infrastructure investment that has the potential to support Transport Orientated Development in strategic locations.
Conoral	Identifying opportunities for spatial policy refinement in the Planning and Design Code to facilitate innovative housing.
General	Council providing realistic dwelling uptake rates as a critical input for any growth target allocations in the Adelaide Hills.

Adelaide Hills Council	Supports
Protection of	Prioritisation of a State-led strategy to manage its crucial food, wine, and fiber production assets.
High-Quality Agricultural Land	Primary Production Priority Area mapping embedded in the Regional Plan as the basis to build a more nuanced policy framework.
Industry Clusters, Fragmentation	Identifying agricultural industry clusters in the Regional Plan as a basis to inform a more nuanced policy framework to deal with issues of fragmentation and interface management.
and Interface Management	Ongoing research collaboration with adjoining councils, Adelaide University, RDA's, Landscape Boards, Industry Bodies and PLUS to inform strategic prioritisation and policy development across the agricultural landscapes of the Mount Lofty Ranges.
	Landscape character unit mapping being embedded in the regional plan as a basis to develop a more nuanced policy framework for the rural landscapes of the Mount Lofty Ranges.
Landscape Character	Identifying scenic routes, lookouts and gateways in the Regional Plan as a basis to support policy criteria to guide appropriate development outcomes in scenically important areas.
Mainstreet Concept Plans	Integration of the Stirling and Crafers Concept Plans in the Regional Plan to guide investment and development outcomes within these important main street settings.

RECOMMENDATIONS - Balanced



Adelaide Hills Council Supports

Tree Management

Increasing the application of the Urban Tree Canopy Overlay to the Township Zones within Adelaide Hills Council and the types of development the Overlay applies to.

Biodiversity

Identifying the opportunity for Biodiversity Corridors in the regional plan as a basis to develop a more nuanced policy framework to respond to the threats to biodiversity and to assist with habitat restoration at a landscape scale.

Reintroducing local planting guides in the planning system, to be embedded via the Planning and Design Code and applied spatially.

Water Security

An integrated whole-of-government approach to managing the water resources of the Mount Lofty Ranges and shared targets.

Up-to-date hazard mapping to inform planning assessments.

Natural Hazards

Exploration of dynamic adaptive policy pathways approach to respond to different climate change scenarios or where unprecedented extreme events require re-evaluation of current adaptation approaches (i.e. as occurred following the Black Summer Bushfires).

Efficient and Resilient Buildings

Exploring an opportunity 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, net zero ambitions and best-practice outcomes.

Adelaide Hills Council Supports

Investigations undertaken as part of the regional planning program to understand capacity of key infrastructure within the Adelaide Hills Council to support any future population targets and investment decisions.

Infrastructure

New tools to ensure equitable distribution of infrastructure for local communities and consideration of developer contributions for local infrastructure.

Waste Management

Identification of potential circular economy precincts to promote agglomeration and innovation within Employment Zones.

Consideration of identifying established state and regional level recreation areas (within identified AHC townships) for a s75 Complying Code Amendment.

Recreation

The Amy Gillet bikeway corridor being recognised in the Regional Plan as an important recreation, tourism and active travel asset.

Endnotes

- 1 TDR Study
- 2 PolisPlan Summary Report
- 3 PPPA Report
- 4 APP Project Draft Report

- 5 Scenic Solutions MLR Landscape Quality Assessment Study
- 6 WAP Review Catchment Summary
- 7 EPA Study Water Quality
- 8 Climate Council Uninsurable Nation
- 9 Where We Build What We Build Project



Adelaide Hills Council

63 Mount Barker Road Stirling SA 5152 (08) 8408 0400 mail@ahc.sa.gov.au www.ahc.sa.gov.au



Appendix 1

Greater Adelaide Regional Plan Discussion Paper



14 November 2023



Planning Aspects Pty Ltd PO Box 986 Kensington Gardens SA 5068

0418 856 580 shanti.ditter@planningaspects.com www.planningaspects.com

ABN 55 114 897 335

© Planning Aspects Pty Ltd 2023

The information contained in this document produced by Planning Aspects Pty Ltd is solely for the use of the Client identified on the cover sheet for the purposes for which it has been prepared and Planning Aspects Pty Ltd undertakes no duty or accepts any responsibility to any third party who may rely on this document.

All rights reserved. No sections or elements of this document may be removed from this document, reproduced, electronically stored or transmitted in any form without the written permission of Planning Aspects Pty Ltd.

Kaurna Acknowledgement

Planning Aspects acknowledges that the land it operates on today is the traditional lands of the Kaurna people and respects their spiritual relationship with their country. It also acknowledges the Kaurna people as the traditional custodians of the Adelaide region and that their cultural and heritage beliefs are still as important to the living Kaurna people today.

Client Contact

Natalie Armstrong

Director Development and Community Services

Adelaide Hills Council

Principal Consultant

Shanti Ditter Principal

Planning Aspects Pty Ltd

Reference

Greater Adelaide Regional Plan Discussion Paper response

Tuesday, 14 November 2023

Company Details

Planning Aspects Pty Ltd

P O Box 986

Kensington Gardens, South Australia 5068

ABN: 55 114 897 335

Contents

Ex	ec	utive	Sum	mary	1
1	Introduction				2
2		Context	3		
2.	1	Pl	annir	ng in Adelaide Hills Council: A Retrospective	3
		2.1.1	1	Planning and Development Act, 1967 (1967 – 1982)	3
		2.1.2	2	Planning Act, 1982 (1982 – 1994)	3
		2.1.3	3	Development Act, 1993 (1994 – 2021)	5
3		Adel	laide	Hills Council Physical differences	10
	3.	1	Adel	aide's Watershed	10
	3.:	3.2 Hill		Face Zone	
	3.	3	Envi	ronment Food Production Area (EFPA)	10
	3.4	4	Prim	ary Production Priority Areas	11
	3.	5	Nati	ve Vegetation	12
	3.	6	Cree	ks, Rivers and Waterbodies	12
4		Curr	ent P	lanning Context	14
	4.	1	Plan	ning, Development and Infrastructure Act, 2016	14
5		Greater Adelaide Regional Plan Discussion Paper (GARP)			16
6	The Future				
7	Conclusion				
Bi	bli	ograi	ohy		20

Executive Summary

The Greater Adelaide Plan (GARP) includes the future planning for the Adelaide Hills Council Area. The GARP Discussion Paper concerns itself with two questions of where and how Adelaide should grow.

Whilst Adelaide Hills Council recognizes its role in providing capacity for growth from a residential and economic perspective, it recognizes the unique place and environment that exists in the council area that requires a carefully curated approach to future land use and environmental management.

Introduction of the Planning and Design Code has introduced standardization of land use and environmental management policy which has introduced unintended consequences on the long term future ability to protect and maintain the special economic, social, cultural and environmental qualities of the place.

This position paper presents the historical backdrop of planning in the Adelaide Hills since the 1960s, and the evidence of the significantly different physical attributes that differentiate Adelaide Hills Council area from Greater Adelaide. Both these factors provide the rationale for the establishment of the Adelaide Hills Council Region. The lessons learnt from the Mount Lofty Ranges Regional Strategy Plan provide a solid base which could be reviewed and refined to form the basis for an Adelaide Hills Council Region. Establishment of the Region must be supported by an appropriately considered governance structure in the form of a Joint Planning Board comprising Council and a range of State Government Agencies that have a stake in the region.

1 Introduction

"... it is not far from the truth when the Mount Lofty Ranges is described as the most complex planning region in Australia." 1

"The Region is of Special importance to South Australia. The mixed use of the Region and its productive nature creates and area of rare beauty, but also of great conflict, requiring a careful, coordinated and cooperative approach to the management of its resources on an ecologically sustainable basis."²

The history of land use planning and natural resource management in the Adelaide Hills Council area has a long pedigree dating back to the 1960s and the earliest days of planning legislation in South Australia. This history is based in the significant importance that the Mount Lofty Ranges specifically has in relation to the provision of water to metropolitan Adelaide, and the productive capacity of its land for horticultural and agricultural production.

This land use significance has been complicated due to significant proximity of the Adelaide Hills Council area to the main population centres of Adelaide and surrounds, which have been brought "closer" into the hills with the development of the South Eastern Freeway which was built in 1967. Further improvements to the Freeway through the development of the Heysen Tunnels in 1999 have greatly improved access.

This position paper explores the history of land use planning in the Adelaide Hills Council area since the 1960's and beyond. It presents a case of the physical characteristics that make the area so different to the remainder of the Greater Adelaide Region, in support of a case for a separate Region within the Greater Adelaide Regional Plan.

¹ South Australian Government (1989) Mount Lofty Ranges Review: Investigations Report pp. 1

² Department of Housing and Urban Development (1993) Mount Lofty Ranges Regional Strategy Plan pp. 1

2 Planning Context

2.1 Planning in Adelaide Hills Council: A Retrospective

2.1.1 Planning and Development Act, 1967 (1967 – 1982)

Contemporary land-use planning in South Australia commenced in 1967 with the promulgation of the *Planning and Development Act, 1967*. It provided statutory recognition to the plan for metropolitan Adelaide, which was intended as an advisory guide and it also established a State Planning Authority which was responsible under the powers of S18(1), of '... promoting and coordinating regional and town planning and the orderly and economic development and use of land within the State ...'.

In 1970, the 'South East Planning Area Development Plan' was authorized as statutory planning policy, following analysis of population growth, the economy, traffic and transport, public utilities and community facilities [6]. Its emphasis was on the orderly expansion of urban centres and the co-ordination of public services. Little attention was paid to rural land use...."

This approach changed when investigations commenced for the Flinders Ranges plan, which necessarily due to the environment and location had to involve investigations and analysis from a landscape and environmental lens. The resultant outcome was the designation of three environmental zones which attempted to meld nature conservation policies with rangelands management practices. It is understood that the Flinders Plan at the time did not attain statutory recognition, however leaseholders utilized its principles for day-to-day management of the land.

The next plan to be considered was the Mount Lofty Ranges Plan. Authorised in March 1975, rural land uses were considered alongside the urban and it is understood that the survey methodologies that were adopted in the Flinders Ranges Plan were also used to inform it. It included consideration of scenic protection and nature conservation, however the assessment for primary production, catchment protection and rural living less carefully thought-out.⁴

As early as the 1975 plan for the Mount Lofty Ranges, it was recognized that:

"... that the implementation of the policies within regional plans was being hampered by the inflexibility of the zoning regulations and that the legislation required them to be based on a 'model' to be applied uniformly with little regard to townscape and landscape subtleties."⁵

2.1.2 *Planning Act, 1982* (1982 – 1994)

By 1982 town planning in South Australia was governed by the new *Planning Act, 1982*. The previous State Planning Authority was abolished and responsibility for planning was placed with the Minister of Planning. Previous plans and zoning regulations were replaced by the South Australian Development Plan. These were to be based on Regional Plans. The Development Plan were to form the primary reference for development decisions. The method that the Development Plan was drafted and administered required planning authorities to use them as their principal development control reference.

³ Alan Hutchings (2005) The evolution of statutory planning in the South Australian countryside, Planning Perspectives, 20:2, 211-228, DOI: 10.1080/02665430500031837 pp. 216-217

⁴ Ibid. pp. 217

⁵ Ibid. pp. 219

The new Act encouraged plans to be drafted ".... along strategic lines with 'objectives' implemented by 'proposals' and 'principles of development control'. These could be for conservation and land management as well as for land use and development⁶.

In the Adelaide Hills Council area, the introduction of the passage of *Planning Act, 1982*, resulted in the Mount Lofty Ranges Review in 1987, the subsequent preparation of the Mount Lofty Ranges Review Investigations Report in March 1989, and the culmination of the Mount Lofty Ranges Regional Strategy Plan by the Department of Housing and Urban Development in 1993.

"In establishing the Mount Lofty Ranges Review in 1987, the Government identified in its Terms of Reference, four principles upon which the development o regional priorities and policies should be based:

- 1. The opportunity for viable agricultural pursuits should be retained.
- 2. The quantity and quality of water production from water catchments should be protected.
- 3. The allocation, use and management of land should be based on land capability principles.
- 4. There should be strong community involvement in all facets of the Review.⁷

Led by the South Australian Government in conjunction with the local government authorities in the Mount Lofty Ranges, preparation of the Mount Lofty Ranges Review Investigations Report involved "... a review of land use and management in the Region aiming to establish better strategies to maintain the unique resources of the area and to preserve the environmental character."8

Under the 1982 legislation, Councils and the Minister of Housing, Urban Development and Local Government were able to make amendments to the South Australian Development Plan by preparing Supplementary Development Plans (SDP).

Accordingly, and following the release of the Draft Mount Lofty Ranges Management Plan, the Minister prepared and released on consultation the Draft Mount Lofty Ranges Comprehensive No. 1 SDP in January 1992. Following a period of public exhibition, this SDP was further scrutinized by the Environment, Resources and Development Committee of Parliament which "... concluded that policies for future planning directions in the Region should reflect the following objectives:

- 1. The long-term future of viable agriculture in the area must be assured.
- 2. The quality of water for the Adelaide area must be maintained and improved.
- 3. The conservation of existing native vegetation and the continuation of reafforestation must be ensured.
- 4. The scenic amenity of the area as an urban hinterland must be maintained and enhanced for tourism and recreational purposes.
- 5. Future planning strategies in the Mount Lofty Ranges should be based on land use and land capability rather than on development potential."9

The ERDC also made a range of recommendations including:

"The creation of an adequately structured regional authority, with representation from interest groups, <u>Local Government and Government agencies</u> and with the following role:

- To advise on and coordinate regional planning policies for the Ranges;
- To recommend the limits of prescribed classes of development within the Ranges;

⁶ Ibid. pp 220

⁷ Department of Housing and Urban Development (1993) Mount Lofty Ranges Regional Strategy Plan pp. xi

South Australian Government (1989) Mount Lofty Ranges Review: Investigations Report pp. i

⁹ Department of Housing and Urban Development (1993) Mount Lofty Ranges Regional Strategy Plan pp. 10 - 11

- To advise on coordinated natural resource management policies within the Ranges;
- To promote public awareness and land management aims within the Ranges;
- To investigate specific issues as they arise."¹⁰

It also recommended the preparation of a new SDP, which was subsequently adopted by the Minister for Housing, Urban Development and Local Government Relations with the preparation of the Mount Lofty Ranges Comprehensive No. 2 SDP.

Most notably it resulted in the introduction of the Mount Lofty Ranges Watershed Overlay which severely restricted all forms of development outside existing urban and township areas.

The establishment of the watershed area came with a strong mandate at a State level to ensure that the urban areas and township boundaries within the watershed area would not be expanded.

The period between 1991 and 1992 brought with it some uncertainty for the planning system with a review of the state's planning regime by the State Government, culminating in the preparation of the "2020 Vision – Ideas for Adelaide" (1992). This review recognized "that current land management practices in the water catchments for Adelaide threaten the quality of Adelaide's water supplies." It went on to further argue that in order to maintain water quality, land use planning and conservative land management practices had to be linked together. Specifically in respect of residential development in the watershed, the "2020 Vision – Ideas for Adelaide" (1992) argued that "... expansion of towns and increases in the number of houses within the water catchment areas will need to be minimized."

The review of the Planning system and the outcome of "2020 Vision – Ideas for Adelaide" (1992) resulted in the repeal of the *Planning Act, 1982* and the introduction of the *Development Act, 1993*.

Falling between the cracks of legislative reform, the Mount Lofty Ranges Regional Strategy Plan and its farreaching recommendations had to be translated into the new planning system.

2.1.3 *Development Act, 1993* (1994 – 2021)

Before the Mount Lofty Ranges Regional Strategy Plan could be implemented under the regime set out under the *Planning Act, 1982*, South Australia yet again ushered in new legislation in the form of the *Development Act, 1993*.

Coming into effect on 15 January 1994, the *Development Act, 1993* introduced yet another new planning regime into the state. It enabled Councils and the Minister of Housing, Urban Development and Local Government Relations to make amendments to the South Australian Development Plan by the preparation of a Plan Amendment Report (PAR). Importantly, the preparation of a PAR required the Minister or the Local Government entity to assess the extent to which the proposed amendment:

- 1. Accords with the Planning Strategy
- 2. Accords with other parts of the Development Plan
- 3. Complements the policies in the Development Plan for adjoining areas; and
- 4. Satisfies the requirements prescribed by the Regulations.

It was the intent of the Mount Lofty Ranges Strategy Plan that its recommendations (where relevant) were to be implemented into the respective Council's Development Plans by way of PARs.

In the Adelaide Hills Council area, a number of PARs that responded to the Strategy Plan that were implemented most notably:

¹⁰ Department of Housing and Urban Development (1993) Mount Lofty Ranges Regional Strategy Plan pp. 11

- Horticulture in the Hills Face Zone PAR in 2000
- Small Scale tourist accommodation in the Rural Zone of the Mount Lofty Ranges PAR in 2000
- Mount Lofty Ranges Watershed Amendments PAR in 2001
- Mount Lofty Ranges Watershed Wineries and Ancillary Development PAR in 2006

Among the recommendations of the Mount Lofty Ranges Regional Strategy Plan was the idea of governance reform. It recommended the establishment of a Regional Management Authority. It also recognized the Mount Lofty Ranges region was "... too diverse for a single Authority to Administer." and instead suggested that the Region be considered divided in two with the Central Hills area comprising the former District Councils of Mount Barker, Happy Valley, Stirling, East Torrens, Onkaparinga, Gumeracha and Mount Pleasant; and the remaining southern councils forming the Southern Fleurieu Area.

The intended purpose of the two Regional Authorities was inter alia "....to:

- Protection of the natural and cultural environment;
- The maintenance of commercial farming uses, and the retention and enhancement of the rural character of the Region; and
- Protection of the quality of surface water run-off."¹²

It is fair to say that the establishment of the recommended Authorities did not proceed. Local Government boundary review processes absorbed the attention of the respective Councils, and perhaps lack of direction or leadership from State Government meant that many of the recommendations of the Strategy Plan were not implemented.

Another element of the new legislation was the mandate for Council's to review their respective Development Plans under Section 30 of the Act. Adelaide Hills Council undertook its last review of its Development Plan in 2012 following the release of the State Government's 30 Year Plan for Greater Adelaide. This process aimed to align those plans to the direction of the council, identify policy needs and ensure plans aligned with the Regional Plan.

The last review influenced a ten-year period of strategic and policy change, including the development and implementation of three Council Strategic Management Plans and the initiation and completion of a number of Development Plan Amendments. In terms of guiding development policy change, the last review period concluded in March 2021 when the Planning and Design Code replaced Council's Development Plan. (Refer Section 3.1 below)

The focus of strategic planning and development policy work between 2011 and 2021 can be generally grouped into four key areas:

- Housing: increase housing diversity to support more housing choice and affordable housing options for downsizers, families and first home buyers
- Township/Urban Areas Character and Amenity: protect township character and amenity, built heritage
- Key Industries and Emerging Sectors: support key industries and emerging sectors through, improved planning processes, policy improvements to legislative instruments (i.e., Development Regulations and Development Plan) and fostering collaborative partnerships (i.e., Rural Land Management Advisory Committee)

¹¹ Ibid. pp 238

¹² Ibid. pp. 238

- **Rural Lands:** protect primary productive land while allowing opportunities for value adding and rural diversification and protecting scenic landscapes
- Placemaking: improve livability and activation through community led-placemaking, and
- **New Planning System:** Transition the Adelaide Hills Council Development Plan to the Planning and Design Code.

While no specific targets were set for the above during the last S. 30 review, demographic and development trends provided Council with the necessary evidence to better understand development trends over the preceding 10-year period. Within its purview, this granularity of detail and evidence enabled Adelaide Hills Council to predict and respond to changes to better manage special aspects of the environment that required greater scrutiny and policy responses.

For the Adelaide Hills Council, implementation of the Mount Lofty Ranges Strategy Plan within the framework that was established under the *Development Act, 1993*, including opportunities for new governance arrangements were a missed opportunity. Notwithstanding this, Council continued to diligently collaborate with its State Government partners including the Environment Protection Authority, Native Vegetation Council, Country Fire Service, Primary Industries and Resources SA, Tourism SA, neighbouring council, key stakeholders and the like to facilitate development whilst being cognizant of the delicate environment for which it has stewardship.

The lack of a bespoke plan with the buy in of key stakeholders including a range of State Government agencies within the Adelaide Hills Council over the period of the *Development Act, 1993* has seen:

- Further and the acceleration of the fragmentation of land
- Significant increases in land values resulting in the viability of primary production becoming a marginal activity
- Degradation in water quality

UNESCO World Heritage Bid

In support of understanding and wishing to secure the special qualities of the Mount Lofty Ranges, Adelaide Hills Council in partnership with Mount Barker Council, Barossa Council and the City of Onkaparinga in 2010 embarked on a project to investigate the UNESCO World Heritage Site listing for the Mount Lofty Ranges agrarian landscape.

The idea to explore the feasibility of mounting a bid for United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage listing of Adelaide's agricultural hinterland was sparked by a collaboration between South Australian researchers and the Thinker-in-Residence program, which in 2009 focused on the Food and Wine Value Chain.

Professor Randy Stringer, a University of Adelaide agricultural economist with extensive experience at the United Nations Food and Agriculture Organization, advanced a proposal, which was then championed by Professor Mike Young, a member of the Wentworth Group of Concerned Scientists. Young saw it as a <u>unique opportunity to assist integrated planning and development at the landscape and regional level.</u>¹³

The four Councils engaged Economists from Adelaide University and other subject matter experts to assist in preparing documentation in support of the bid. Adelaide University stated that "... the study calls attention to the diverse contributions agriculture makes to the social and environmental life of the region,

¹³ Exploring UNESCO World Heritage Site listing for the Mount Lofty Ranges agrarian landscape, S. Johnston, J. Morison, R. Stringer, P.Mickan, M. Salver, G. Sarre and J.Tagliaferri, University of Adelaide 2012. pp. iv

not simply the economy. Evidence suggests that these contributions are not well understood, seldom analysed in the context of the region's development, and rarely reflected in local development policy strategies.¹⁴

In 2019, following seven years of research and discussion, it was considered time to assess the strength of the World Heritage case. The review undertaken by Duncan Marshall and Dr Jane Lennon AM highlighted the core justification for pursuing World Heritage listing, namely:

- the presence of heritage values associated with a ground-breaking 19th century model of colonisation or systematic colonisation; and
- the links to a philosophical movement of universal significance, and the continuing reflection of those original utopian ideals in the contemporary landscape and land management practices.

Other parts of the rationale that were originally referred to, such as the 'world-renowned food, wine and tourism regions' were considered background or descriptive information, but lacking in substantial evidence to be considered as the core argument for WH listing. This was a significant shift from the original justification and many people's understandings of the bid.

A key finding of the review was recognition that a bid that combines the Adelaide plan and the systematic colonisation settlement landscape of South Australia would represent a substantially more complete portrayal of the colonial settlement model and the whole of the settlement system. As a result, Adelaide City Council and the Mt Lofty Ranges partner councils started to explore the merits of a combined bid.

As part of the collaborative work World Heritage expert Duncan Marshall was again engaged to provide further rationale for the joint bid. This work produced a single narrative for the combined bid, as follows:

The nineteenth century property comprising Adelaide and its Rural Settlement Landscapes, including the early Adelaide plan, is of Outstanding Universal Value as exceptional evidence of the Wakefield systematic colonisation model, an important and influential model in the history of European free migration and colonial settlement. It is the most complete realisation of British colonial settlement planning in the world, and/or a major achievement of such colonial planning.

Mr Marshall's expert advice suggested that this nomination could satisfy three of the World Heritage criteria, noting that only one would need to be eventually satisfied to be eligible for World Heritage listing status.

In order to share the results of these reviews more widely, a small expert workshop was convened on 25-26 August 2022 in Adelaide and Hahndorf, and online. The workshop comprised a series of presentations as well as group and plenary discussions.

Key observations and messages arising from the workshop and discussions, included:

- the nomination project should proceed. This is an important and worthwhile journey for the South Australia community, and while there is some caution arising from gaps in the currently available research, there is something special about the history of this European settlement in an Aboriginal landscape, and good potential for a successful World Heritage listing;
- there is a need to better recognise and integrate the prior and continuing Aboriginal history, landscape and people into the proposed nomination. This includes substantial engagement with the Aboriginal community and seeking its further support (Free, Prior and Informed Consent);

٠

¹⁴ Ibid. pp. xi

- the nomination project is potentially an important part of truth-telling about the history of South Australia, aligning to the State Government's commitment to such a process; and
- there is a substantial amount of work still to be done to prepare a nomination, building upon a considerable foundation of previous research.

It is critical that the joint nomination recognises the impact of settlement on Aboriginal people. Truthtelling and Reconciliation are an important and necessary part of the nomination. This complements the stated ambition of the State and Federal Governments regarding recognition, truth-telling and future treaties, and constitutional change. In fact, it could play a strong role. Certainly, the history in the nomination needs to address both Aboriginal and settler histories and perspectives, and the overall nomination needs to be pitched with an honest and balanced presentation of the story, and of course with Aboriginal agreement if not actual support.

Since this workshop a couple of key progressions have been made. Firstly, the Tentative List submission for Adelaide and its Rural Settlement Landscapes has been drafted. Such a submission is a formal precondition under the World Heritage Convention before a nomination can be submitted. This draft submission requires further development and consultations before it is ready for lodgement.

Secondly, and most noteworthy, the joint initiative has recently received support from the Deputy Premier to prepare the Tentative listing document for approval. Being accepted on the Tentative List is step one of the World Heritage processes and this recent approval to consider the bid is a significant step.

The funding Mt Lofty Councils have not provided financial resources for a couple of years, however there are funds remaining in the joint account that can be used to further progress the joint bid in the foreseeable future. The World Heritage rationale will continue to be explored and refined where the keys to success will be the governance process and embedding First Nations input. Next steps include:

- Exploring and establishing a joint World Heritage Governance structure to progress the nomination and provide a pathway on how the World Heritage Bid will be managed.
- Developing a project brief on how to best engage with relevant Aboriginal communities and seek their support through a Memorandum of Understanding.
- Developing a First Nations narrative in partnership with the communities to be incorporated into the colonisation story and add value to the truth-telling and inform the Tentative Listing submission.
- Continuing to refine the draft Tentative Listing document.
- Presenting a paper at the International Council on Monuments and Sites (ICOMOS) General Assembly 2023 Conference.

Pursuit of World Heritage and the potential successful listing will have implication for how land within the Adelaide Hills Council area is managed into the future, however it does not take away from the fundamental role that the planning system has to control and manage land use into the future.

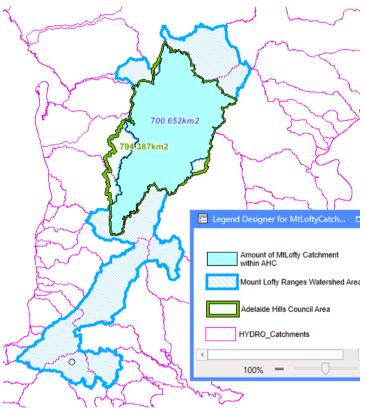
3 Adelaide Hills Council Physical differences

The following section presents data and maps that illustrate the characteristics of the Adelaide Hills Council area that differentiate it from other areas within the Greater Adelaide Regional Plan.

3.1 Adelaide's Watershed

The Mt Lofty Watershed Area, that is occupied by the Adelaide Hills Council Area is 700.65km², which equates to 88.2% of total council land area as illustrated in Map 1.

Map 1: Proportion of Council area in the Mount Lofty Watershed area



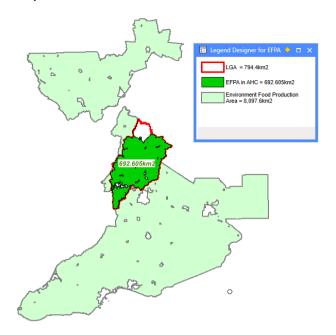
3.2 Hills Face Zone

The total area of the Hills Face Zone that is located within the Adelaide Hills Council area is 33.4 km² which is equivalent to 4.2% of the total council area.

3.3 Environment Food Production Area (EFPA)

692.6km² or 87.19% of the council area is designated within the EFPA which comprises 8.6% of the total EFP Area.

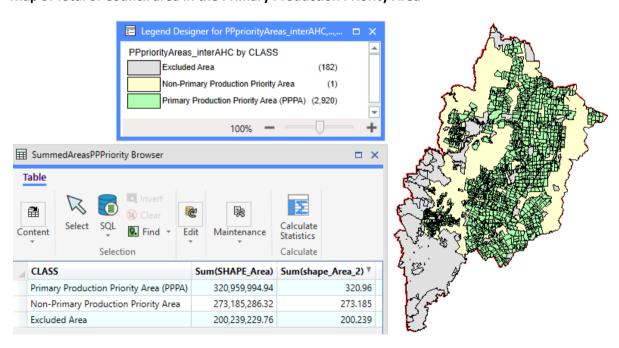
Map 2: Total of Council area in the Environment Food Production Area



3.4 Primary Production Priority Areas

321 km² or 40.4% of the Council area comprises the Primary Production Priority Area (PPPA)

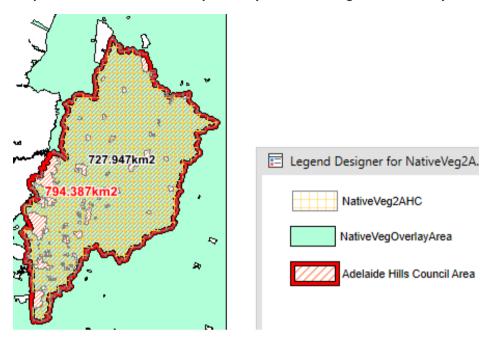
Map 3: Total of Council area in the Primary Production Priority Area



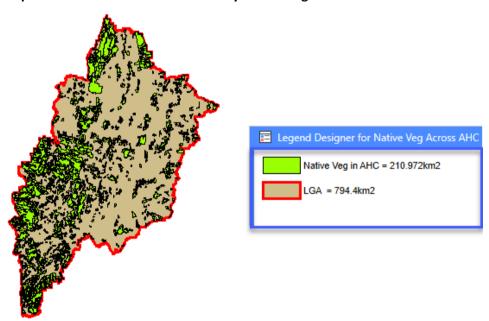
3.5 Native Vegetation

727.9km² or 91.6% of the Council area is covered by the Native Vegetation Overlay, with 26.6% of the Council area is covered by native vegetation.

Map 4: Total of Council area impacted by the Native Vegetation Overlay



Map 5: Area of Council area covered by Native Vegetation

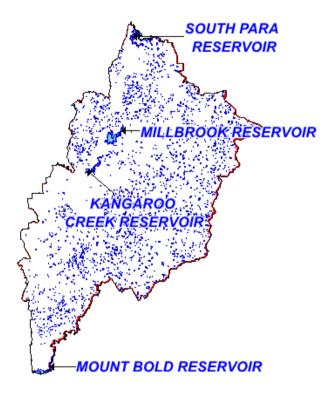


3.6 Creeks, Rivers and Waterbodies

The council area is home to 2,087.7km of rivers, creeks and streams. The major ones being the Onkaparinga River and the River Torrens. It is also occupied by 4,530 water bodies (dams) which occupy a total surface area of 13.95km².

There are 5 major reservoirs within Adelaide Hills Council Area (noting that Millbrook reservoir has 2 main dams) occupying a total area of 9.14km². Both South Para and Mount Bold reservoirs are also located within the adjoining council's areas.

Map 6: Creeks, Rivers and Waterbodies



4 Current Planning Context

4.1 Planning, Development and Infrastructure Act, 2016

Following the work and recommendations of the Expert Panel into Planning in 2014, the *Planning, Development and Infrastructure Act, 2016* (PDI Act) was introduced into South Australia. Under the Act, a series of Planning Instruments are to be prepared to ensure that development is appropriately located, designed and considered. They set the strategic planning vision for the state and help to assess development applications that require planning consent as part of their approval. The following are the relevant instruments under the Act:

- State Planning Policies
- Regional Plans
- Planning and Design Code
- Environment and Food Production Areas
- Character Preservation Districts
- Design Standards
- Building Envelope Plans
- Site Contamination Assessment
- Heritage Standards

The effect of the introduction of the Environment and Food Production Areas in April 2017 for the Adelaide Hills Council area is to:

- "protect our valuable food producing and rural areas as well as conserving our prized natural landscapes, and tourism and environmental resources
- support our sustainable growth and encourage the building of new homes in our existing urban footprint where supporting infrastructure already exists
- provide more certainty to food and wine producers as well as developers on the direction of future development in metropolitan Adelaide."¹⁵

Similar to the establishment of the watershed protection area in the late 1980s which came with a strong mandate at the State level to ensure that the urban areas and township boundaries within the watershed area would not be expanded, introduction of the (EFPA) provides a strong legislative mechanism – a quasi-urban growth boundary – that instructs a relevant authority to refuse a development for a land division within the EFPA if it is intended for residential purposes. In essence its effect makes the land outside of existing townships sterile for built up residential purposes or rezoning to deliver housing.

Another instrument under the Act requires the State Planning Commission (the Commission) to prepare and maintain the Planning and Design Code (the Code).

"The Code sets out a comprehensive set of policies, rules and classifications which, when combined with mapping, apply in the various parts of the State for the purposes of development assessment in South Australia." The Code was progressively brought into effect in three phases between mid-2019 and 19 March 2021 and replaced all Development Plans across South Australia. The Code is the State's single planning rule book and contains planning policies for the assessment of a development application under the 2016 Act. The policies within the Code are required to reflect and align with the Government's State

¹⁵https://plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_areas

¹⁶ https://plan.sa.gov.au/__data/assets/pdf_file/0010/799939/Guide_to_the_Planning_and_Design_Code.pdf

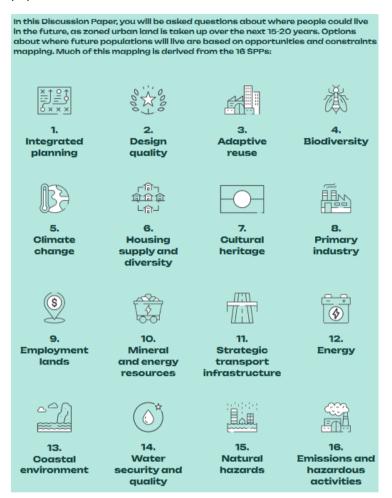
Planning Policies. The State Planning Policies are required to set out a framework for land use in South Australia to improve the livability, sustainability and prosperity of the state.

The Code has introduced a uniform set of Zones and Overlays that apply uniformly across the State. Nuances in Zones and Policy areas that were previously applied in geographic areas such as the Mount Lofty Ranges have been standardized across the state. Specific to the Mount Lofty Ranges however is the inclusion of the Mount Lofty Ranges Watershed Overlay.

Together the EFPA and the Mount Lofty Ranges Watershed Overlay restrict residential development to within existing towns and villages in the Council area. These policy mechanisms don't however, provide the nuanced levels of controls that are required to manage farm expansion; tourism developments; contemporary forms of business developments such as seen in micro – production activities. It is activities such as these that the planning system and policy settings as they are currently crafted are not able to appropriately manage. Having said this, it is the delicate nature of the environment within the Adelaide Hills Council area that require special consideration as was envisaged in the 1992 Mount Lofty Ranges Regional Strategy Plan.

5 Greater Adelaide Regional Plan Discussion Paper (GARP)

The GARP has been prepared to generate discussion within the community on the future growth and development of Greater Adelaide which extends from Two Wells in the north to Goolwa in the south and Murray Bridge to its east. It is primarily concerned with how to house and employ Adelaide's future population as illustrated below:



The Discussion Paper specifically requests its audience to consider the two following questions:

1. How should Greater Adelaide grow?

The GARP will establish a 30-year vision for the Greater Adelaide region. It will identify where people will live and work, how they will move around, and where they will access services.

2. Where should Adelaide grow?

A central role of the Greater Adelaide Regional Plan is to ensure enough land is available to support projected housing and employment growth over the next 30 years.

While Adelaide Hills Council has land within it that is set aside for housing and employment, a significant part of it (compared to all other Councils in the GARP geography) that is constrained by the features detailed in Section 3 to this report. It is for these reasons that the thinking for the future of Adelaide Hills Council 30-year future has to be different.

6 The Future

The Mount Lofty Ranges and more specifically the Adelaide Hills Council area is a place that has been for decades important to the economic and environmental wellbeing of the Adelaide metropolitan area.

Several attempts have been made to cater for its special qualities from a planning and development perspective. While the PDI Act provides some policy protections to guard against some development outcomes, the reality is that the Adelaide Hills is a complex environment where contested interests ranging from natural resource management to environmental protection, housing to watershed protection, native vegetation conservation to mining are at play. Necessarily this involves:

- various State Government agencies and Ministers that have responsibilities for other legislative instruments that have an interplay with planning;
- key stakeholders including industry, farming, business and conservation;
- the Landscape Board; and
- residents.

Notwithstanding the limited traction that was gained from the recommendations of the Mount Lofty Ranges Regional Strategy Plan, which were due in large part to:

- distractions caused by Local Government Boundary reform and Council amalgamations in the mid-1990s
- the change-over in legislation from the 1982 Act to the 1993 Act; and
- lack of State Government Leadership to progress the recommendations of the plan.

Its ideals were reiterated in the recommendations of the 1992 "2020 Vision – Ideas for Adelaide" report.

Adelaide Hills Council has attempted to via active and productive partnerships with its neighbouring Councils to have the special qualities and environment of the Mount Lofty Ranges protected by supporting the UNESCO World Heritage Bid.

A common theme that arises from the near 60-year history of planning in the Adelaide Hills is the need to work within and across government; with industry partners and stakeholders; and residents to establish an enduring governance structure that is able to:

- advise on and coordinate regional planning policies;
- recommend the limits of development;
- advise on coordinated natural resource management policies;
- promote public awareness and land management aims;
- monitor and investigate issues and trends as they arise;
- recommend and make updates to the Regional Plan and the Planning and Design Code.

Whilst Adelaide Hills Council is situated within the Greater Adelaide Planning Region, it is a peculiarity from a planning, environment, settlement and economic perspective. In order to distinguish its differences, it is recommended that it is granted special status with its own Region within the Greater Adelaide Regional Plan.

The planning regime established under the *Planning, Design and Development Act, 2016* under S 63. Regional Plans, ss (4) facilitates such an outcome in that:

"A regional plan may—

(a) be divided into various parts that relate to subregions; and

(b) include structure plans, master plans, concept plans or other similar documents.

Designation as a Region would only be viable on the basis that a suitable governance structure is also put in place comprising representatives from relevant state agencies including environment, water, primary industries and resources, transport; key stakeholders and Adelaide Hills Council to inform and commit to the recommendations of a Regional plan.

Adelaide Hills Council is therefore requesting that the State Planning Commission considers the development of a stand-alone Adelaide Hills Council Region. It is also recommended that serious consideration for a Mount Lofty region be considered together with the establishment of a Joint Planning Board. Its purpose would be to appropriately plan for and manage the key elements of the watershed, hills face and primary production features of the region in an holistic manner with input and buy in from the key state and local agencies that have responsibility for its long-term future and management.

7 Conclusion

With a tapestry of competing priorities and interests, the Adelaide Hills council area is a complex planning and natural resource management environment that various planning regimes since the 1960s have been calling for special treatment.

The 1993 Mount Lofty Ranges Regional Strategy Plan is the one piece of work that has come closest to formulating a solution to the long-term management and sustainable governance of the Adelaide Hills council area environment. Implementation of the 1992 plan was interrupted as a result of the introduction of the *Development Act, 1993*.

This paper argues and supports the preparation of a Region plan for the Adelaide Hills Council. It also calls for the establishment of a Joint Planning Board in support of the Region. Its establishment will facilitate proactive planning, policy and management to ensure the long-term protection and management of the features of the Adelaide Hills area that are significantly valued to the broader Adelaide community and economy of South Australia.

Bibliography

Department of Housing and Urban Development (1993) *Mount Lofty Ranges Regional Strategy Plan*Alan Hutchings (2005) *The evolution of statutory planning in the South Australian countryside, Planning Perspectives*, 20:2, 211-228, DOI: 10.1080/02665430500031837

S. Johnston, J. Morison, R. Stringer, P.Mickan, M. Salver, G. Sarre and J.Tagliaferri, University of Adelaide (2012) *Exploring UNESCO World Heritage Site listing for the Mount Lofty Ranges agrarian landscape*

Planning, Development and Infrastructure Act, 2016

South Australian Government (1989) *Mount Lofty Ranges Review: Investigations Report*State Planning Commission (2023) *Greater Adelaide Regional Plan: Discussion Paper*

DTI:PlanSA Submissions

From: David Bailey

Sent: Monday, 30 October 2023 2:10 PM

To: DTI:PlanSA Submissions

Cc: dstarr

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper

Attachments: Adelaide Plains Council - Submission to Greater Adelaide Regional Plan Discussion Paper - 30

October 2023.pdf

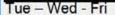
You don't often get email from

Learn why this is important

Hello

Please find attached our submission

David Bailey
Strategic Projects Officer
Growth and Investment





www.apc.sa.gov.au

View our: office locations - newsletter - latest news - linkedin

Have your say and help shape the future of the Greater Adelaide Region





Adelaide Plains Council acknowledges that we work on the Traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land and we acknowledge that they are of continuing importance to the Kaurna people living today.

This email and any attachments are intended solely for the named recipient only. The information it contains may be confidential or commercially sensitive. If you are not the intended recipient you must not use, reproduce or distribute any part of this email or disclose its contents to any other party. Please contact us immediately and then delete the message from your computer.



30 October 2023

Reference: D23/48569

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

GPO Box 1815 Adelaide SA 5001 Principal Office 2a Wasleys Road PO Box 18 Mallala SA 5502

P 08 8527 0200 E info@apc.sa.gov.au

ABN 58 384 968 672

Dear Sir/Madam

Greater Adelaide Regional Plan Discussion Paper

At its meeting on 23 October 2023, Council endorsed preparing a submission on the Greater Adelaide Regional Plan Discussion Paper.

The key comments from Council's submission on the GARP discussion paper are summarized below, with detail contained in the submission and attached reports.

Adelaide Plains Interests	Summary of Comments
Residential and Employment Growth	Council is fully committed in its annual and long-term planning and financial capacity to undertake its role in one of the already fastest growing Council's in South Australia.
	Council is generally open to the concept of further growth flagged in the Discussion Paper and acknowledges that further growth will need Council to provide sufficient operational resources to undertake its role in planning for this further growth.
	Council's openness is however conditional on further 'whole of Government' work to align and integrate State level infrastructure and funding to ensure the foreshadowed growth is serviced, liveable and sustainable. If urban growth is to occur there is a need for
	infrastructure provision and local employment to keep pace with residential growth. apc.sa.



While Council is adept at planning for urban growth and is open to further growth within APC, support services and infrastructure provision and funding must provide for the retention of sustainable and liveable communities.

Further Two Wells Growth

If residential and employment growth is proposed at Two Wells as per the Discussion Paper, then demand for services (physical and social) and infrastructure upgrades will increase exponentially and Council and development sector will not be able to fully fund them.

The draft Strategy needs to include detailed and timed 'whole of Government' infrastructure proposals, both physical and social.

Commission is requested to undertake research which shows that the proposed Two Wells housing/employment mix in the context of the Northern Adelaide Plains Food Bowl will lead to realisation of the ability for most residents to live, work and recreate locally. Investigations need to consider public and community transport.

The draft GARP should include specific strategies about providing diverse housing mix – including aged, community and social housing - in new growth areas.

Two Wells/Lewiston Rural Living and Animal Husbandry

The draft GARP should include:

- a specific strategy envisaging the Animal Husbandry area continuing.
- timing about the progressive lifting of the EFPA of land zoned for rural living/animal husbandry throughout Lewiston.

Land supply investigations for the draft GARP should analyse need for progressive release of land and over what timeframe for rural living within the northern region of which Lewiston is part, noting the role of GARP to plan ahead for land supply over decades.



	<u>, </u>
Dublin and Mallala	The draft GARP should provide spatial and timing clarity for growth at Dublin. Growing Dublin's services role is important for increasing agribusiness and visitation to the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP). AIBSNP-WP is recognised as an important part of the Greater Adelaide Open Space System. The role of both Dublin and Mallala is recognised in the Adelaide Plains Growth Strategy.
Productive Land	Council affirms the importance of food and water security.
	Council requests the Commission consider the following:
	The integrated approach to food and water associated with the Northern Foodbowl Protection Areas Development Plan Amendment of 2018 and the significant investment in the Northern Adelaide Infrastructure Scheme need further time to realise the intended benefits. The draft GARP should contain specific strategies - including spatially applied - to provide ongoing certainty for long term private and public investment.
	 Enabling productive land for food presents local job opportunities. This is important for residents moving to planned growth to be able to work locally, with the social, less travel, and less emissions benefits.
1/	 Unrealised opportunities of food production areas involve tourism and education
	Council requests the Commission work with PIRSA, experts and the Northern Adelaide Plains Food Cluster, to provide guidance on the nature of food production investigations needed to inform lifting the EFPA. This guidance could be within the draft GARP



Open Space Proposals in Paper

Council supports an updated metropolitan open space strategy.

This includes recognising the regional role of the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP) as a key part of the Greater Adelaide Open Space System.

With both current planned growth and the future growth flagged in the Discussion Paper, the draft GARP should include a specific strategy about the Gawler River seeking recreation and hazard management outcomes.

Council requests the Commission be aware of the following:

- Managing flood hazard is a key outcome for agribusiness and residential interests in the flood plain
- Much of the Gawler River proper is in private ownership
- Hazard and funding options investigations by the Gawler River Flood Management Authority are ongoing
- The Planning and Design Code does not contain policy seeking that the Gawler River land become public land when land division of land involving the Gawler River itself is proposed.
- A Gawler River Open Space Strategy was completed in 2009.

Environment Proposals in Paper

The draft GARP should include actions to ensure climate ready and energy efficient building design.

The Commission's 'Planning for Climate Change' Brochure¹ outlines various proposals for including for change of the Planning and Design Code that need proper investigation.

The current statutory arrangements and Planning and Design Code within Adelaide Plains are lacking with respect to inadequately planning ahead to address the

apc.sa.gov.au

¹ plan.sa.gov.au/ data/assets/pdf file/0005/1252895/Planning-for-climate-change.pdf



	risk of heat from urban growth. The current experience is extensive use of black roofs and limited landscaping/trees, resulting in facilitation of growth less climate ready.
Infrastructure Planning	We suggest a northern region planning team, possibly as an augmentation to the growth areas infrastructure team within Planning and Land Use Services (PLUS). A northern region planning team should work with Adelaide Plains, Playford, Gawler, Light Regional and Barossa Councils as well as Infrastructure SA on a coordinated approach to planning, infrastructure (physical and social) and funding in the north of Adelaide.
Hazard Management	Significant portions of Adelaide Plains Council are subject to potential inundation/flooding (Gawler River, Light River and Coastal inundation). Any potential for urban growth in APC should consider necessary flood mitigation infrastructure requirements and an appropriate funding strategy.
Private Land Investigation	With respect to private land investigations, the submission outlines the following: 1. Content of Council's adopted Growth Strategy that deals with further investigations of the Hicks land at Two Wells and private land at Dublin. 2. Ordinary Council Meeting Agendas contain reports that are subject to confidentiality orders with dates and titles as follows: a. 24 July 2023 - Dublin Urban Land Development. b. 23 October 2023 Two Wells West Development Proposal



For more information on Council's submission, please contact David Bailey, Strategic Projects Officer at info@apc.sa.gov.au or (08) 8527 0200.

Yours sincerely



Darren Starr

Director Growth and Investment

Attached - Submission - Greater Adelaide Regional Plan Discussion Paper.



Submission – Greater Adelaide Regional Plan Discussion Paper



30 October 2023

Contents

APPROACH TO SUBMISSION	2
RESIDENTIAL AND EMPLOYMENT GROWTH PROPOSALS	3
Further Two Wells Growth	5
Two Wells/Lewiston Rural Living and Animal Husbandry	9
Dublin and Mallala	12
Productive Land	14
OPEN SPACE PROPOSALS	16
ENVIRONMENT PROPOSALS	18
PRIVATE LAND INVESTIGATION	18
APPENDICES	19

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

APPROACH TO SUBMISSION

Adelaide Plains is one of SA's fastest growing councils. Adelaide Plains grew from 8,912 in 2016 to 9,655 in 2021 and is planned to grow to 19,000 by 2041. 80% of growth is at Two Wells. Two Wells grew at 4.8% per annum between 2016 and 2021, a rate of growth comparable to Mt Barker, and well above metropolitan Adelaide.

Adelaide Plains is Kaurna country.

Adelaide Plains Council represents a proud community with vibrant townships and remarkable landscapes. Council represents this growing population across 935 square kilometres connected to the Barossa, South Australian coast, and Adelaide.

The Light and Gawler Rivers pass through the region creating rich, fertile plains ideal for supplying primary produce to local, national, and international markets. The expanse of farmland is a common thread that connects each township's unique character. Adelaide Plains is a place where people can choose to live and work locally, with quality services, facilities and open space that supports community wellbeing and resilience.

With a growing population and economy, Council undertakes strategic planning, makes submissions to other entities, seeks funding opportunities, and provides day to day services.

These activities are to support an enviable lifestyle, emerging economy, remarkable landscapes and provide proactive leadership for the community and environment of the Adelaide Plains council area.

RESIDENTIAL AND EMPLOYMENT GROWTH PROPOSALS

The Discussion Paper proposes further areas for longer term growth across Greater Adelaide, be it CBD infill, middle ring suburb regeneration, or green field and township expansion on the fringe, such as at Two Wells and south of Riverlea.

This is intended to work towards four outcomes for Greater Adelaide. The idea of living locally forms part of how the Commission intends to grow Greater Adelaide, including within Adelaide Plains. Living locally is about there being opportunities for living, working, and recreating 'locally'.

Living Locally can contribute to the Commission's four outcomes for Greater Adelaide: · Protects environmental areas A greener, wilder · Reduces reliance on private car travel and climate resilient Reduces pollution and CO₂ emissions environment Focuses on access to high quality open space · Aligns with the state's Climate Change Action Plan. A more equitable and Enhances sense of community Supports passive surveillance to increase safety socially-cohesive place · Diverse housing contributes to diverse communities Equal access to services and amenities across neighbourhoods Improves health and wellbeing outcomes. A strong economy built Supports health and infrastructure savings to the SA economy · Reduces household transport time and cost on a smarter, cleaner, · Supports local economies, particularly retail trade regenerative future · Supports mixed-use opportunities, bringing jobs to where people live. A greater choice of · Supports the core component of 'Affordable Living' concepts Promotes housing diversity and affordability in different contexts housing in the right Focuses on better design of infill housing, including improved places greening Enhances sense of wellbeing linked to shorter commute times.

Figure 1 Four Outcomes are intended for Greater Adelaide, with living locally supporting all four

Background

Delivering growth that is liveable and sustainable through expanding townships such as Two Wells needs coordinated planning and infastructure provision by all the relevant physical and social infrastructure providers (including Council in its infrastructure role).

Officer level discusisons with northern region councils indicate an opennes to further growth but a consistent message about need for infrastructure noting most infrastructure is not local government funded.

Within this submission, our 'Comments to Commission' have been informed by the following contained in the **Appendices**:

- Council's 2023 Growth Strategy and Action Plan and Background Paper. This is guiding current planned growth
- 2023 Submission to Expert Panel
- 2022 Submission to the Environment and Food Production Area Review.

Comment to Commission

As an organisation, Council is fully committed in its annual and long term planning and financial capacity to address its role as one of the fastest growing Council's in South Australia.

Council is open to the concept of further urban growth flagged in the Discussion Paper and acknowledges any further growth will need Council to provide sufficient operational resources to undertake its role in planning for this further growth.

Council's openness is however conditional on further 'whole of Government' work to align and integrate State level infrastructure and funding to ensure the foreshadowed growth is serviced, liveable and sustainable.

The term 'whole of Government' is used recognising the Commission needs to work with other State level entities responsible for planning and delivering infrastructure and services such as health, schools, emergency services, transport, water, sewer and hazard infrastructure.

A 'whole of government' approach is needed to ensure the Commissions four outcomes for Greater Adelaide are met.

To assist with this, we suggest a northern region planning team, possibly as an augmentation to the growth areas infrastructure team within Planning and Land Use Services (PLUS). A northern region planning team should work with Adelaide Plains, Playford, Gawler, Light Regional and Barossa Councils as well as Infrastructure SA on a coordinated approach to planning, infrastructure and funding in the north of Adelaide.

¹ apc.sa.gov.au/council-services/development/strategicprojects

Further Two Wells Growth

The Discussion Paper proposes further growth for employment and living at Two Wells.





Figure 2 Proposed Areas of Investigation in the Discussion Paper

Why this area

This area was identified as an investigation area for future residential/ employment activities because:

- It makes use of the significant investment in road infrastructure already completed
- Further development would build on and leverage the current development activity that is already planned for Riverlea and Two Wells, which is anticipated to provide more than 15,000 new dwellings over the short to medium term
- Planned infrastructure investment to support these already identified development fronts could be leveraged as a base for further growth (regional infrastructure solutions)
- The topography of the land does not present significant challenges
- The current land uses could be moved to other locations without significantly impacting the state's economy
- The land has lower primary production value than other high-quality land in the north
- It is well connected to strategic employment lands in northern Adelaide, such as Edinburgh Parks
- Additional development in this investigation area may provide the population numbers needed to justify significant regional infrastructure investment.

Challenges

Some of the challenges associated with potential future residential/employment activities include:

- Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed
- Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance
- The area is currently not supported by high frequency public transport and would require significant investment in trunk infrastructure to support urban growth
- It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency
- Hazards and environmental issue such as flooding would need to be considered and managed.

Figure 3 Explanation about the Investigation Areas in the Discussion Paper

Background

Recognising Adelaide Plains is one of SA's fastest growing councils, in 2023, Council adopted a Growth Strategy and Action Plan (GSAP).

The purpose of the GSAP is to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. The GSAP has a long term view to 2040 with targeted actions focused over the next 5 10 years.

The Growth Strtegy evisages recognises the potential for growth on the Hicks land to the north west of Two Wells.



Figure 4 The Hicks land at Two Wells is north of the Eden housing estate, and east of the railway line

The GARP Discussion Paper suggests planned infrastructure to support existing growth regionally could be leveraged to support 'further growth', that existing land uses could be relocated without significantly impacting the SA economy, and that the further growth 'may' provide the population to justify significant regional infrastructure investment.

Historically, there has been lack of State Government funding of services within Adelaide Plains and Two Wells other than roads, e.g., no public health services, no public transport (bus or rail), and limited education facilities aside from Riverbanks College. There is limited community transport across Adelaide Plains.

While Council is planning for current growth as part of its Growth Strategy e.g. zoned land, support from State Govenrment is required to accommodate existing planned growth as well as further urban growth.

Comment to Commission

If residential and employment growth is proposed at Two Wells as per the Discussion Paper, then demand for services (physical and social) and infrastructure upgrades will increase exponentially and Council and development sector will not be able to fully fund.

The draft Strategy needs to include detailed and timed 'whole of Government' infrastructure proposals.

To inform these proposals, the Commission is requested to undertake research which shows the proposed Two Wells housing/employment mix in the context of the foodbowl will lead to realisation of the ability for most residents to live, work and recreate locally, and to lessen the time, financial, environmental and social costs associated with high proportion of lengthy commute time. This benefits agribusiness growth who need workers.

Housing diversity is highlighted however there is currently no incentive for diversity and recent legislative changes make it easier to create homogeneous townships. The draft GARP should include specific strategies about providing diverse housing mix including aged, community and social housing in new growth areas.

Investigations need to look at public and community transport, in particular east west. The Regional Public Health Plan² for Adelaide Plains, Light Regional, Barossa and Gawler seeks improved public transport, the establishment of a regional community passanger network, and targetted improvements in walking and cycling networks.

8

² barossa.sa.gov.au/council/management-plans/public-health-and-wellbeing-plan

Two Wells/Lewiston Rural Living and Animal Husbandry

The Discussion Paper recognises the Rural Living area exists stating 'Except for areas currently identified for urban development, most of this (north western area) is currently zoned for rural and horticultural activities, including rural living or lifestyle allotments.'

Background

Council's submission to the 2021 EFPA review (see Appendice):

- Questioned the rationale for the EFPA applying to Rural Living Zoned land.
- Flagged being open to the EFPA continuing in place over Two Wells / Lewiston Rural Living Zone and Animal Husbandry Subzone until, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:
 - The barrier of the Environment and Food Production Area limiting subdivision for low intensity residential living where associated with horse or dog keeping being corrected.
 - The lack of the Environment and Food Production Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.
- Sought that the Greater Adelaide Regional Plan should better reflect the Animal Husbandry Zone as a business cluster and the envisaged development of horticulture in the southern third of Adelaide Plains.

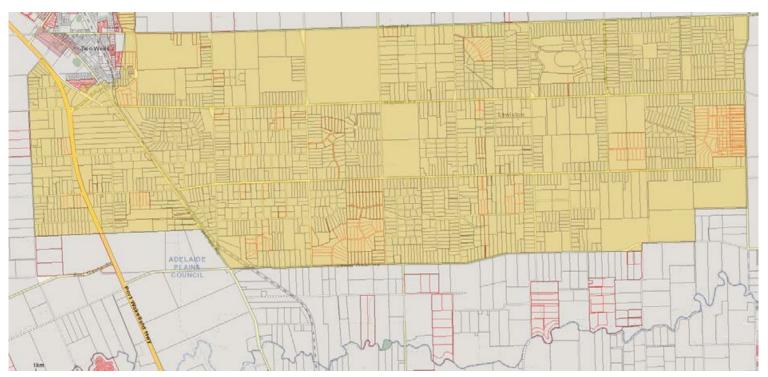


Figure 5 The large undivided lots are unable to be subdivided for rural living due to the EFPA. Map (SAPPA September 2023) shows new rural living lots progressively being bought to the market due to land divisions being lodged prior to the EFPA coming into effect.

New rural living lots are progressively being bought to the market due to land divisions being lodged prior to the EFPA coming into effect. However, some 20 large lots in Lewiston are unable to be subdivided for rural living due to the EFPA, and there is no clear strategy for the release of that land.

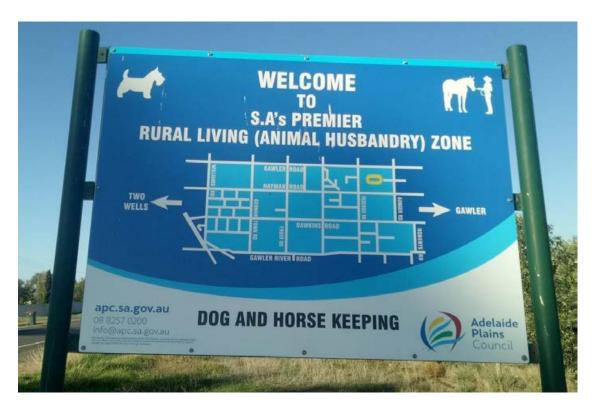


Figure 6 SA's Premier Rural Living Animal Husbandry Zone

Investigations and engagement over 2022 lead to Council's adopted Equine Strategy³ envisaging horse activity growth in the Animal Husbandy area.

Comment to Commission

Council requests the draft GARP include a specific strategy envisaging the Animal Husbandry Area continuing to operate as it has for many years and reflecting long term planning policy.

Noting the intent of the draft GARP to inform future EFPA reviews, Council requests the draft GARP include timing about the progressive lifting of the EFPA of land zoned for rural living throughout Lewiston. Land supply investigations for the draft GARP should analyse need for progressive release of land and over what timeframe for rural living within the northern region of which Lewiston is part, noting the role of GARP to plan ahead for land supply over decades.

³ Available via <u>apc.sa.gov.au/council-services/development/strategicprojects</u>

Dublin and Mallala

The Paper states 'The Investigation areas do not extend as far as the towns of Dublin and Mallala. These towns will keep their own separate identity but may expand locally to support township function and viability'.

Background

Mallala has zoned land, with the Gracewood land division envisaging some 500 lots. This land division has been granted planning consent. Other land is available long term.

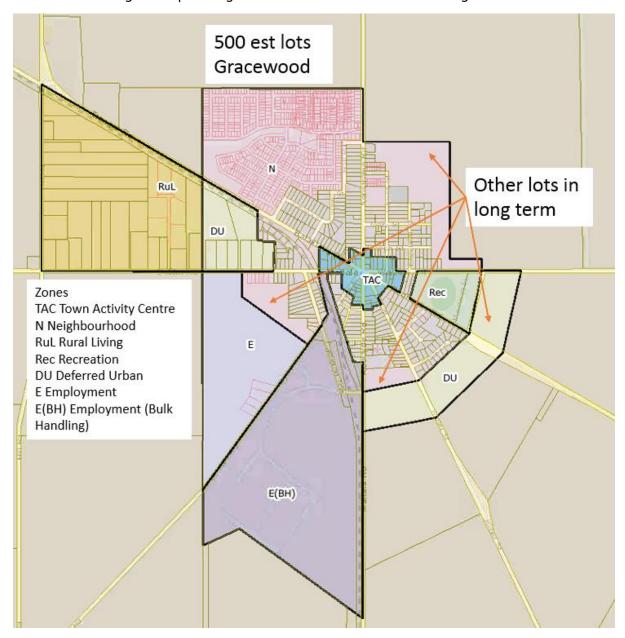


Figure 7 Zoned land for growth at Mallala

At Dublin, Council's Growth Strategy evisages potential further growth at Dublin

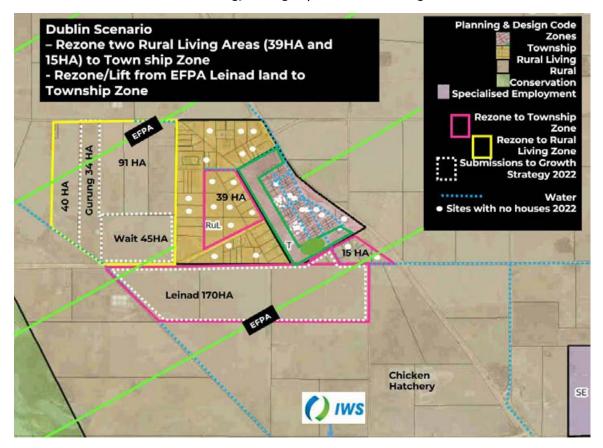


Figure 8 The 2022 scenario proposed in submissions to Council's Growth Strategy involve expansion of the township zone to the west and south, and further Rural Living to the west

Council's Business Plan for 2023/24 contains a project to undertake the Dublin Township Growth and Tourism Master Plan. Staff have commenced preparing a Background Paper and informal discussions with local stakeholders and development interests.

For Dublin, further investigations are needed around:

- opportunities to grow tourism and business experiences
- need for land supply release for housing, including rural living as transition to agriculture. Assessment of value of soil for food production and environmentally needs consideration
- potential for conflict with established uses, such as the chicken hatchery and waste facility to the south
- community infrastructure and open space
- hard infrastructure, e.g. sewer and water.

Comment to Commission

Planned growth is progressing at Mallala.

The draft GARP should provide spatial and timing clarity for growth at Dublin. Growing Dublin's services role is important for increasing agribusiness and visitation to the Adelaide

International Bird Sanctuary National Park Winaityinaityi Pangkara (AIBSNP WP). AIBSNP WP is recognised as an important part of the Greater Adelaide Open Space System.

Productive Land

The Discussion Paper states 'Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance.'

The Discussion Paper acknowledges food and water security as a key trend influencing Greater Adelaide's future.



Figure 9 The vast majority of land in Adelaide Plains is impacted by the EFPA

The EFPA covers the majority of land within Adelaide Plains and does not allow the division of land solely for housing.

Council's submission to the 2021 EFPA review (**Appendice**) affirmed the EFPA generally aligned with Council's strategic goals and noted various matters required review.

The GARP Discussion Paper was discussed at various meetings involving RDA Barossa and the Northern Adelaide Plains Food Cluster. A meeting of officers of peri urban councils identified the following areas of shared interest:

- The Greater Adelaide Regional Plan needs to bring back a focus on the peri urban region as a sub region in its own right with overarching objectives and outcomes.
- Need to have Primary Production Priority Areas (PPPA) areas identified before looking at any changes to EFPA boundaries.
- The Planning & Design Code has increased the ability for value adding and diversification which is seen as positive. However, absence of fine grained policy in former Development Plans not in the Planning and Design Code presents certain risks associated with ongoing land use intensification and diversification. Existing Rural Living Zones also need better understanding in terms of the trends and data influencing them. These matters need proper investigation and data collation and analysis to inform possible changes to the Planning and Design Code.
- Identifying and promoting scenic routes, scenic lookouts and the like which contribute
 to the landscape value needs to be prioritised and introduced to the Planning and
 Design Code.

Comment to Commission

Council affirms the importance of food and water security.

Council requests the Commission consider the following:

- The integrated approach to food and water associated with the Northern Foodbowl Protection Areas Development Plan Amendment of 2018 and the significant investment in the Northern Adelaide Infrastructure Scheme need further time to realise the intended benefits. The draft GARP should contain specific strategies including spatially applied to provide ongoing certainty for long term private and public investment.
- Enabling productive land for food presents local job opportunities. This is important for residents moving to planned growth to be able to work locally, with the social, less travel, and less emissions benefits.
- Unrealised opportunities of food production areas involve tourism and education

Council requests the Commission work with PIRSA, experts and the Northern Adelaide Plains Food Cluster, to provide guidance on the nature of food production investigations needed to inform lifting the EFPA. This guidance could be within the draft GARP

Northern Adelaide Irrigation Scheme (NAIS)

The Northern Adelaide Irrigation Scheme (NAIS) was intended to provide recycled water to be used to irrigate crops, particularly horticulture. The project jointly funded by the South Australian and Australian Governments involved the development of new water treatment facilities built within the Bolivar precinct to increase its production of recycled irrigation water.

The Scheme, which is delivered by SA Water, was intended to unlock 12GL of quality water to be used in agricultural food production to support the development of over 300 hectares of high technology horticulture, and a further 2,700 hectares of advanced agri food production. Council undertook a Development Plan Amendment which was aimed at facilitating significant recycled water from the Bolivar wastewater treatment plant, and harvesting this water for intensive high tech irrigated horticulture.

To date there has been low rates of take up of NAIS water, with the horticulture industry citing high capital contribution/connection costs, infrastructure augmentation requirements, access to NAIS infrastructure and the high cost and quality of water as barrier to using the scheme. This results in water reuse through the scheme being low and economic development, particularly horticulture, not being stimulated. The development of the NAIS project to its full potential would lead to significant employment and economic activity within the Northern Adelaide Plains and South Australia.

OPEN SPACE PROPOSALS

The Discussion Paper outlines the Commission will build on the Metropolitan Open Space Framework in the Greater Adelaide Regional Plan to create quality open spaces across the region.

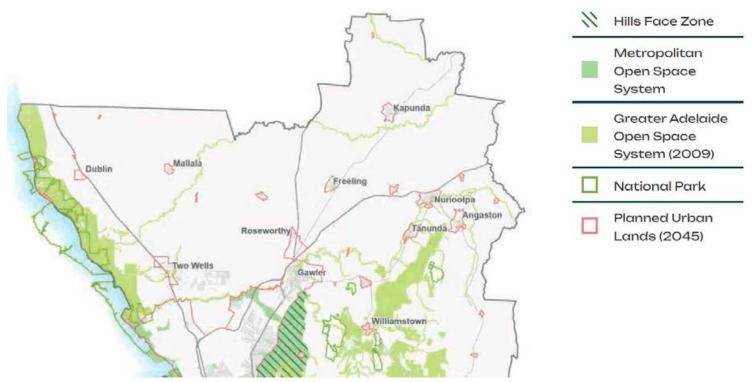


Figure 10 2010 and Current MOSS areas as shown in the Discussion Paper

Background

The Adelaide International Bird Sanctuary National Park Winaityi Pangkara (AIBSNP WP) as a key part of the Greater Adelaide Open Space System, as are the Light and Gawler Rivers, and a range of local parks.

Council is working closely with National Parks and Wildlife Service about the future of coastal settlements enveloped by AIBSNP WP including discussing options to inform possible plans for the settlements.

Much of Adelaide Plains is subject to potential for flooding and Council is part of the Gawler River Flood Management Authority. The Gawler River is formed by the confluence of the North Para and South Para in the town of Gawler and is located in the Adelaide Plains district of South Australia. The district surrounding the river produces cereal crops and sheep for both meat and wool, as well as market gardens, horticulture, almond orchards and vineyards. The farm gate output of the Gawler River floodplain horticultural areas is estimated to be at least \$355 million.

The river is subject to periodic flood events. The catchment is identified in the state's flood hazard plan as a significant flood risk. The River has been flooded on average every 10 years over the past 160 years (known records). Most recently, large floods have occurred in 1992 (September, October, December), November 2005 and October 2016.)

The Gawler River Flood Management Authoity was established for the purposes of coordinating the planning, construction, operation and maintenance of flood mitigation infrastructure for the Gawler River. The regular flooding along the Gawler River impacts affected communities through displacement, economic loss and infrastructure repair/replacement. Costs of undertaking flood mitigation infrastructure works are significant and any further urban growth in Adelaide Plains should consider likely flood mitigation requirements, costs associated with those measures and funding sources.

Flood protection ranked as the most important issue in Council's 2018 and 2022 community surveys. In preparing Council's 2021 2024 Strategic Plan, consultation with relevant authorities identified the capacity issues of the Adelaide Plains section of the Gawler River and the ongoing likelihood of flooding could impact economic and urban development. The hazard to residents and businesses presented by risk of Gawler River floods continues to be a challenge. Hazard and funding options continue to be investigated by the Gawler River Flood Management Authority, with Department of Environment and Water briefing Council at its meeting on 25 September 2023 about the Gawler River Flood Management Business Case.

The Gawler River Open Space Strategy was prepared in 2009 for the Gawler River Floodplain management Authority.

Council is intending to prepare an updated Open Space Strategy in 2023/2024.

Comment

Council supports an updated metropolitan open space strategy.

This includes reognising the regional role of the Adelaide International Bird Sanctuary National Park Winaityinaityi Pangkara (AIBSNP WP) as a key part of the Greater Adelaide Open Space System.

With both current planned growth and the future growth flagged in the Discussion Paper, the draft GARP should include a specific strategy about the Gawler River seeking recreation and hazard management outcomes.

Council requests the Commission be aware of the following:

- Managing flood hazard is a key outcome for agribusiness and residential interests in the flood plain
- Much of the Gawler River proper is in private ownership
- Hazard and funding options investigations by the Gawler River Flood Management Authority and State Government are ongoing
- A Gawler River Open Space Strategy was completed in 2009.

ENVIRONMENT PROPOSALS

The Discussion Paper documents the impacts of climate change and the need for an updated open space strategy and greening are identified. The Discussion Paper outlines a range of ideas to respond to climate change and to foster resilience. Many of these are policies or programs underway and intended to continue.

Comment

The draft GARP should include actions to ensure climate ready and energy efficient building design.

The Commission's 'Planning for Climate Change' Brochure⁴ outlines various proposals for including for change of the Planning and Design Code that need proper investigation.

The current statutory arrangements and Planning and Design Code within Adelaide Plains are lacking with respect to inadequatelyplanning ahead to address the risk of heat from urban growth. The current experience is extensive use of black roofs and limited landscaping/trees, resulting in facilitation of growth less climate ready.

PRIVATE LAND INVESTIGATION

Council provides the following information about private land investigations.

- 1. Council's adopted Growth Strategy has a strategy to 'Plan for future urban growth including at Dublin and Two Wells'. Related actions are:
 - a. 'Dublin scope future urban growth to the south and west, noting 2019 Council decision to support further investigating Leinad land south of existing township. Consider near coastal tourism role, agriculture, proximity to established industries and Carslake Industrial Area, community and open space facilities, recreation and sport, water reuse and necessary infrastructure.'

⁴ plan.sa.gov.au/ data/assets/pdf file/0005/1252895/Planning-for-climate-change.pdf

- b. 'Two Wells Hicks land scope future urban growth, noting 2019 Council decision for in principle support for further investigations. Consider housing mix, recreation and sport, water reuse, the train line and Mallala Road, and orderly connections with Two Wells. The potential urban development of the Hicks land immediately to the east of Liberty and separated by Mallala Road and the ARTC train line will need to involve the Hickinbotham Group, DIT and ARTC as key stakeholders amongst others. Continue with Growth Strategy action seeking the urban development of the Hick's land, noting this involves seeking lifting of the Environment and Food Production Area, rezoning, and suitable infrastructure agreements.'
- 2. Ordinary Council Meeting Agendas contain reports that are subject to confidentiality orders with dates and titles as follows:
 - a. 24 July 2023 Dublin Urban Land Development.
 - b. 23 October 2023 Two Wells West Land Development Proposal

APPENDICES

Growth Strategy and Action Plan and Background Paper 2023 Expert Panel Planning Review Submission 2023 (this includes Council's Environment and Food Production Area Submission 2021 and Council's Submission on introdution of Planning and Design Code)









GROWTH STRATEGY



May 2023

Contents

PURPOSE	3
ROLE OF COUNCIL	3
VISION	3
SETTING THE SCENE	5
POPULATION FORECASTS BASED ON PLANNED URBAN GROWTH.	5
POPULATION FORECASTS BASED ON POTENTIAL URBAN GROWT	
MAIN LOCATIONS OF POPULATION GROWTH1	.0
RELATIONSHIP WITH OTHER STRATEGIES1	. 1
Strategic Plan1	. 1
Long Term Financial Plan1	. 1
GROWTH PLAN ON A PAGE1	.2
THREE TOWN SERVICE MODEL1	.3
TWO WELLS	.4
Strategy1	.4
What is Needed and When1	.5
One Scenario for Two Wells1	.6
STRATEGIES AND ACTIONS1	.7
Enviable Lifestyle	.8
Emerging Economy2	24
Remarkable Landscapes2	27

Proactive Leadership30

Cover Photos Updating community infrastructure like at Two Wells with Village Green adjacent the Library and Xavier School are critical to support liveable population growth. Agribusiness growth and coastal experience growth are important priorities.

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today

Version	Comment
May 2023	Adopted 24 April 2023
April 2023	Refined following consultation
July 2022	Consultation
June 2022	For Council June 2022

PURPOSE

The purpose of the Growth Strategy and Action Plan (GSAP) is to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. The GSAP has a long term view to 2040 with targeted actions focussed over the next 5 10 years.

Liveable growth involves some actions for APC to lead. Some actions however are for others to deliver, including State Government, and development and community partners. APC will collaborate with others including nearby councils and regional authorities as appropriate on all the strategies and actions.

Liveable growth occurs by collaborative relationships and smart investment in the necessary social and economic infrastructure.

This GSAP draws on the Adelaide Plains Growth Background Paper.

ROLE OF COUNCIL

Council has roles in planning for growth, advocating about the impacts of growth, and delivering infrastructure and services sometimes via facilitating that support growth.

This GSAP describes Council's roles as:

- Plan
- Advocate

Deliver/facilitate.

VISION

Council's Strategic Plan 2020 2024 identifies the vision for the Council area. Council's Strategic Plan also contains 'Strategic Responses'.

These strategies include enviable lifestyle, emerging economy, remarkable landscapes and proactive leadership.

This GSAP supports achievement of the aspired Vision by identifying Strategies and Actions based on and structured around the Strategic Plan 2021 2024 outcome areas of:

- Enviable Lifestyle
- Emerging Economy
- Remarkable Landscapes
- Proactive Leadership

¹ <u>apc.sa.gov.au/_data/assets/pdf_file/0023/355181/Adelaide-Plains-</u>Council-Strategic-Plan-2021-2024

Vision

Adelaide Plains is:

Productive: A leading supplier of primary produce to local, national and international markets.

Proximity to markets and natural growing conditions provide competitive advantages for primary producers on the Adelaide Plains that has seen our economy emerge as a key contributor to the region's prosperity.

Diverse: A more diverse community with access to a greater mix of local opportunities.

Increased employment, services and education attracts and retains a diverse community that chooses to live, learn and work in the region.

Location: A lifestyle location connected to the Barossa, Coast and Adelaide.

Adelaide Plains is a quiet community that offers residents time and space with convenient access to the benefits of Greater Adelaide, the coast and the Barossa region.

Welcoming: A proud, spirited and generous community.

This is a place that everyone belongs, where community connection and care is strong and someone is always available to help when a neighbour is in need.

Ambition: Advancing infrastructure and technology to foster a competitive local economy.

Modern practice, research and innovation, and efficient access to export centres and local markets builds an economic environment and reputation that rivals the State's major primary productions regions. With employment opportunities diversifying and new housing products in abundance, Adelaide Plains will become the place of choice for the Northern Adelaide Plains.

Leadership: A decisive and proactive Council.

Our Elected Members share a vision of prosperity founded on courage, robust deliberation, transparency and forward thinking and investing.

Attractive: A Place of choice for businesses, residents and visitors.

Our townships are inviting, well cared for, filled with character and provide a range of services, facilities and accommodation that caters for all people and our landscapes, events and infrastructure provide memorable experiences.

Tourism and Economic Development Strategy

Five Themes

- Town Centres and Main Streets
- Business Support and Growth
- Food and Primary Industries
- Coastal Experiences
- Marketing and Branding

SETTING THE SCENE

Planning for growth is important as the population of Adelaide Plain's is forecast to double over the next 20 years.

The majority of population growth is at Two Wells. Demand at Two Wells is being driven by available and serviced land, government stimulus, the northern connector, and opening of new facilities such as Xavier College.

Growth is also flagged but yet to commence at Mallala.

Council has supported further possible growth at Two Wells and Dublin, with these requiring investigations, rezoning, lifting of the Environment and Food Production Area, infrastructure planning and provision.

Growth in Adelaide Plains is part of the outer north being planned for the greatest amount of fringe growth in Greater Adelaide.

The Growth Background Paper contains detailed investigations.

POPULATION FORECASTS BASED ON PLANNED URBAN GROWTH

SA Government provide forecasts² about growth based on low, medium and high scenarios.

Adapting these forecasts, the following low, medium and high scenarios are forecast for Adelaide Plains.

The LOW projection includes MEDIUM growth but at a lower rate or over an extended period of time. The LOW projection aligns with a forecast of 19,358 in 2050³.

The MEDIUM projection includes growth that is known.

- Known includes land already zoned for urban development.
- At Two Wells, this assumes Liberty and Eden are both completed over the next 20 years. Eden with around 265 lots and Liberty with around 2000 lots. This also assumes a town CWMS is installed and land within the proposed levee is rezoned, both leading to the ability for increased housing options within the original township.
- At Mallala, Gracewood with around 500 lots is developed and a small number of dwellings constructed in the balance of Mallala.
 1042 residents in Mallala and nearby rural areas in 2021⁴ grows by 1300 to around 2300 in 2040.

plan.sa.gov.au/news/article/2019/new_population_projections_released_for_south australia

³ Population forecast by Holmes Dyer as included in the APC Strategic Plan 2021 – 2024.

⁴ <u>quickstats.censusdata.abs.gov.au</u>

- At Lewiston, some 600 residents move into existing lots or lots with approvals pending release over the next 20 years. This number recognises the impact of flood risk entails the more readily developable land has already been developed, and the impact of the EFPA on precluding the ability for further residential only development.
- Through the balance of the Council area including Dublin and 100 further residents at Thompson Beach, small increases in population.

The HIGH projection includes MEDIUM growth but at a faster rate or over a shortened period of time.

The MEDIUM projection identifies that the Council area grows from 9977 in 2021 to 18,500 residents by 2041. 7,500 of this growth is at Two Wells.

On projections generally, the level of certainty decreases the further into time a forecast looks forward.

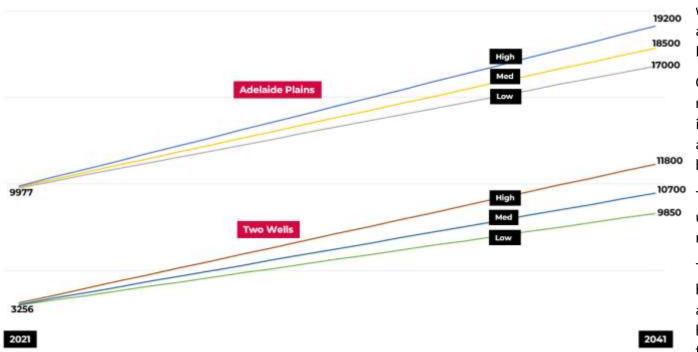
The final block was settled at Eden in early 2023 and Liberty will continue to see more dwellings constructed. There is less certainty

when Gracewood will commence works, and likewise when lodged divisions in Lewiston are brought to market.

Certainty is impacted by global and national economic conditions, other land in nearby locations, such as in Playford and Light Regional Council's being brought to the market.

This uncertainty underscores the basis to update the strategies and actions regularly to take account of change.

This growth strategy and action plan is based on the MEDIUM forecast, adopting a proactive approach to planning for a higher rate of growth than the LOW forecast.



	20205	2021 ABS	2041 est	Increase est	Dwellings/ Annum est	Residents/ Annum est
Adelaide Plains HIGH	9441	9977	19,177 19,100	9,736 9,700	175	460
Adelaide Plains MEDIUM	9441	9977	18,477 17,800	9,036 8,400	150	400
Adelaide Plains LOW	9441	9977	16,977 16,800	7,536 7,400	132	350
Two Wells ⁶ HIGH	2743	3256	11,756 11,700	9,013 8,900	160	425
Two Wells MEDIUM	2743	3256	10,856 10,700	8,113 8,000	140	380
Two Wells LOW	2743	3256	9,856 9,700	7,113 7,000	125	330

This strategy involves actions focussed on fostering a liveable and sustainable Two Wells, recognising just over 80% of population growth is forecast there.

⁵ profile.id.com.au/adelaide-plains/population-estimate accessed October 2022

POPULATION FORECASTS BASED ON POTENTIAL URBAN GROWTH

In 2019, Council decided to support investigations for potential further urban growth on the Hicks land at Two Wells and to the south of Dublin on the Leinad land. Submissions in the 2022 consultation affirmed interest in potential urban growth at the Hicks land and to the south and west of Dublin.

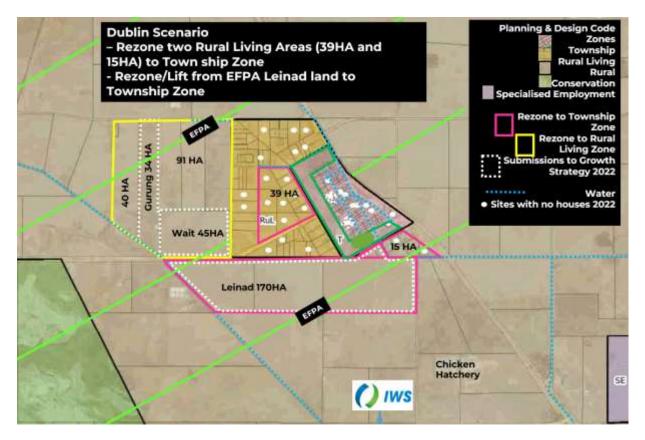
A decision to release Hicks land and land at Dublin as potential urban growth are significant unknowns. Both are within the Environment and Food Production Area (EFPA). The decision to allow the land to be developed for urban growth is ultimately a matter for SA Parliament on the advice of the Planning Minister, the State Planning Commission, and with input from Council. The State Planning Commission five yearly review of the EFPA is next due in 2026.

The Hicks land has potential for around 2,500 residents/940 dwellings in total. If Hicks land was fully developed by 2040, this would lead to a Two Wells of around 13,400.

Land at Dublin has potential for around 4000 residents/1500 dwellings in total. Added to Dublin's 405 residents of 2021, Dublin could be in the order of 4,500. Accounting for the variability of land owners intentions, if around 25% of sites are developed (rather than all sites), this entails Dublin could grow by 1000 to around 1400. If undertaken over 20 years to 2041, this rate of growth is 6% per annum, 1% higher than experienced at Two Wells from 2016 2021. If a 3% per annum rate of growth is experienced over 20 years to 2041, this is an increase of 345, leading to a total population of 750.



The Hicks land at Two Wells is north of the Eden housing estate, and east of the railway line



The Dublin scenario proposed in submissions in 2022 by Leinad, Gurung and Wait involve expansion of the township zone to the west and south, and further Rural Living to the west

Under a MEDIUM scenario, Adelaide Plains grows from 9441 in 2020 to 18,500 in 2040. If both Hicks and Dublin land was released and fully developed within that timeframe, this would lead to Adelaide Plains in 2040 being around 25,000. This would be a 2.5 times population increase.

Noting available land within Adelaide Plains and the State Planning Commission's 2021 assessment⁷ of no need to open up further land within Greater Adelaide (which includes Adelaide Plains), neither are likely to be available prior to 2026.

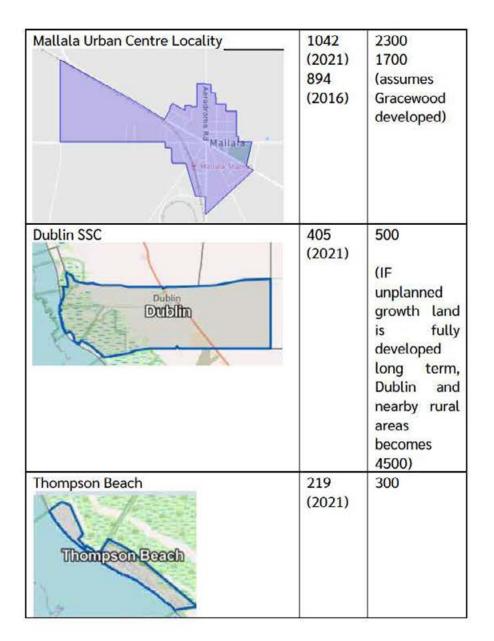
Recognising Council decisions to support investigations for this potential growth, this strategy plans for this potential growth in the longer term order to create liveable communities whilst not unduly impacting existing zoned supply.

9

plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_on_areas

MAIN LOCATIONS OF POPULATION GROWTH

	Current	2041 est
Two Wells SA2 (Statistical Area Level 2)	3256 (2021) 2743 (2020)	(IF Hicks land fully developed, Two Wells becomes 13,400)
Lewiston SSC (State Suburb)	3310 (2021) 3076 (2016)	4050 3500



RELATIONSHIP WITH OTHER STRATEGIES

Strategic Plan

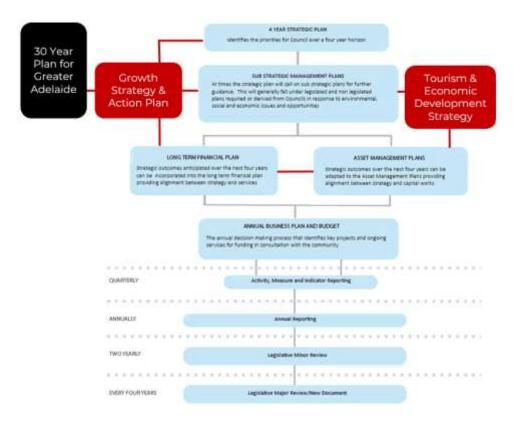
The GSAP:

- Summarises analysis undertaken by Council covering economic, social, health and recreational planning, landscape and environmental planning, land use planning, infrastructure capacity, governance, and review of the 30 Year Plan for Greater Adelaide (refer Growth Background Paper)
- Identifies Strategies and Actions based on the Strategic Plan 2021 2024 outcome areas of:
 - Enviable Lifestyle
 - Emerging Economy
 - Remarkable Economy
 - Proactive Leadership

Long Term Financial Plan

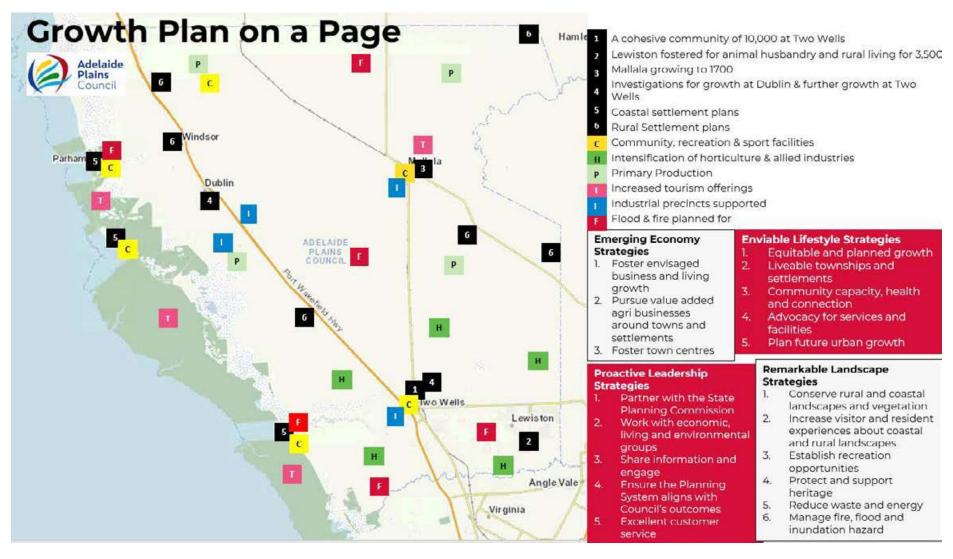
Council has a Long Term Financial Plan looking forward 10 Years. This was released for consultation in late 2021. The LTFP includes various studies informing planning for growth.

These studies are referenced with relevant growth actions with the text 'Consultation LTFP late 2021'.



How the Growth Strategy and Action Plan relates to Council's Four Year Plan, Long Term Financial Plan, and Asset Plans, as well as the 30 Year Plan For Greater Adelaide

GROWTH PLAN ON A PAGE



A summary of planning for Adelaide Plains growth

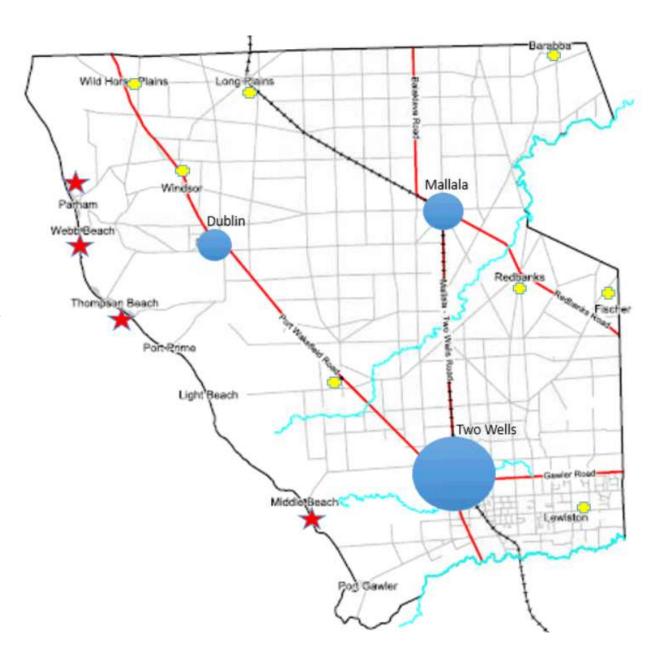
THREE TOWN SERVICE MODEL

Adelaide Plains is envisaged with three major towns and 12 coastal and rural settlements.

As Adelaide Plains grows, growth planning is seeking to foster liveable and sustainable outcomes across these townships and settlements, and with the aim for a range of services and facilities to be reasonably convenient and accessible.

This includes community and recreational facilities, health and education, employment options, and a variety of transport options.

This is in the context of nearby envisaged growth in the City of Playford, Gawler and Light Regional.



TWO WELLS

Arising from decisions in 2010 2012, planned urban growth is envisaging a Two Wells of around 10,500.

This growth is around 80% of growth planned in Adelaide Plains.

Strategy

'A cohesive country community of 10,500' is the strategy for Two Wells.

'Cohesive' recognises fostering 'a' community with many new people moving into a 'country' town is important.

The Actions are summarised in the Image.

Actions specific for Two Wells are placed together under the outcome areas.



Image Summary of Two Wells Actions to Support a Cohesive Community of 10,500

What is Needed and When

This table summarises what is needed and when at Two Wells.

	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41
Popu at on	3256	363 6	401 6	439 6	477 6	515 6	553 6	591 6	629 6	667 6	705 6	743 6	781 6	819 6	857 6	895 6	9336	971 6	10096	10476	10856
Town Centre	Fac tate growth of Two We s Man Street through development of contemporary reta offering												6								
Community Cvc Hub	P an an	d de ver	commu	n ty c v o	hub																
Xav er Recreat on Prec nct	Work with Xavier on vision, noting Deed requiring oval, soccer field, and two courts for netbal/tennis and shared school/community use																				
Town Centre Recreat on Prec nct	P an and create upgraded sport and recreat on prec nct and bus ness case for indoor recreation. Consider Crown																				
Loca Northern Centre & Recreat on Prec nct	goods a	potent a and serv o and a cor Road.	es n the	norther	n part of	Two We	s. Cons	der co	ocat on v	th recre	eat on ar	d sport									
Increased Housing Choice		100000000000000000000000000000000000000		ns de rge s tes	evee. C	ons der															
Waking Cycing Network	Prepare	Pan	start	de very		Upd ate	cont r	nue de 🕦	ery												
Pub c Transport nc nterchange and EV's	Ongo ng advocacy and p ann ng																				
Town CWMS	P an and instal. Note this opens up housing choice																				
H cks		H cks po a posto				ents to															

One Scenario for Two Wells

Liberty is a significant expansion of Two Wells. Council supports further growth to the north east on what is referred to as the 'Hicks' land. This requires further investigation.

If Hick's goes ahead, challenges are around how this influences Two Wells overall.

There are a variety of scenarios. In the scenario on the map:

- The Main Street is revitalised via retail development, increasing housing choice and aged housing throughout the original township, and the Oval precinct regenerated,
- A Greater Xavier Recreation Precinct for school and community purposes is established
- The Hicks land is developed for housing with investigations considering the need for neighbourhood space, an orderly approach to any local centre, and benefits of collocation with sport and recreation. The Australian Rail Track Corporation advises grade separation needed to gain access across the train line. This needs further investigation.



STRATEGIES AND ACTIONS

This part of the Growth Strategy and Action Plan forms the strategies and actions.

The strategies and actions are structured based on the Strategic Plan outcomes of Enviable Lifestyle, Emerging Economy, Remarkable Landscapes and Proactive Leadership.

Strategies are the strategies to be pursued to achieve the outcomes and Actions are how the strategies are to be achieved.

- Short term
- Medium term
- Ongoing informs operational activity



Freedom Park at Liberty, Two Wells Planning for infrastructure fosters liveability

Enviable Lifestyle

Strategic Plan 2021 2024

Arrest the departure of younger population through affordable housing, access to diverse employment opportunities, regional university pathways and retail/recreation. Support retention of older community members through compact living with ease of access to improved retail and services in townships. Add to the vibrancy of towns through events, volunteering opportunities and community initiative funds or service support.

- Manage growth to sustain and activate our townships
- Provide, support and acquire facilities, assets, services and programs that build community capacity, health and connection
- Advocate for increased health, education, aged care and youth services, welfare and emergency facilities and services.

What do We Know

Adelaide Plains is part of Greater Adelaide and experiencing demand for urban growth. Much of this is already planned through the zoning established in the Planning and Design Code, reinforced by the Environment and Food Production Area (EFPA), at Two Wells, Mallala and Lewiston. Considering future urban growth, such as at Hicks Two Wells, and Leinad land at Dublin, needs to have regard to their local context, local needs, as well as their potential impact in the market. Established settlements along the coast and within agricultural areas are constrained for environmental and food production purposes. These will each need an approach based on the unique context of each. Noting decisions enabling planned growth at Two Wells and Mallala, Dublin and the surrounding areas in the north west of the Council area are a focus for more investigations.

Providing further housing choice is important, including affordable, aged, short term worker and for tourism. Having a planned approach to moving be it freight, public transport, or being 'active' for health is an important part of planning for growth.

The 2016 Open Space Study identified for the growth at Two Wells and noting lack of sport facilities in Lewiston, the potential need in total for three ovals, two cricket pitches, three soccer pitches, an eight tennis court facility, and four netball courts. An ideal option was soccer pitches overlaid by a further oval. Noting Xavier College intended oval and sports field, existing facilities at Two Wells Oval, lack of facilities in Lewiston, there is a need for a planned approach to recreation and sport infrastructure.

The 30 Year Plan envisages providing community facilities 'in advance'. For Two Wells, this is reflected in the Hickinbotham/Council Deed envisaging facilities be provided neither significantly in advance nor significantly after when they are needed. Council's civic, library and community facilities,

as well as the Golf Club need repurposing with a vision associated with planned growth. Ongoing advocacy for generally State provided facilities, be it SAPOL or educational, to service growth at Two Wells will be important.

Enviable Lifestyle Strategies

- 1. Equitable and planned growth acknowledging the distinct history, identify, needs and future of each of Adelaide Plains' towns and settlements.
- Foster liveable townships and settlements through influencing planned urban development and working with development partners, infrastructure providers, government and local communities.
- 3. Build community capacity, health and connection through:
 - o planning for timely provision of suitable infrastructure to enable an enviable lifestyle
 - o community and stakeholder participation in town and settlement planning processes.
- 4. Advocate for increased services and facilities with respect to health, education, aged care, youth, and welfare and emergency services.
- 5. Plan for future urban growth including at Dublin and the Hicks land at Two Wells

Enviable Lifestyle Action Plan

	Actions	Next Steps
1.	Land supply and demand Monitor to understand likely timing and nature of future land releases for urban growth. Consider level of infrastructure needed, and an orderly approach to land release. This is at Two Wells, Dublin and Lewiston, and also associated with the next review of the Environment and Food Production Area in 2026. Key Liaison State Planning Commission	Ongoing
2.	Housing options monitor dwellings being provided to meet housing needs, including for ageing resident and seasonal workers. This includes at Two Wells consequent on CWMS enabling increased housing choice, and rezoning land inside the levee. Key Liaison SA Housing Authority	Ongoing

3.	Art and Culture investigate and establish a strategy to foster throughout the Council area. In particular in town centres, open spaces and associated with the Kaurna and colonial history and culture across the Council area.	Investigate in Short to Medium Term
4.	Council Service Hubs - Provide suitable multi use facilities for Council services that serves the Council area as a whole.	Investigate in Short to Medium Term
5.	Mallala continue to support planned urban development in particular but not exclusively the Gracewood development and the necessary infrastructure to occur. Progress Mallala Oval Master Plan. LTFP 28 Feb 2022 Social and Community Infrastructure Plan \$100k 22/23 Open Space & Recreation Strategy \$60k 22/23	Investigate in Short to Medium Term
	Stage 1 Two Wells/Mallala Ovals Master Plan \$100k 22/23	
6.	 Lewiston identify a preferred future through investigating and engaging. Consider: The aspired land use mix into the future, noting trends in agriculture, equine and living Opportunities to enhance the gathering point at Hayman/Pederick Options to improve connectivity including walking, cycling and equine to Two Wells, north, east and south Flood risk 	Investigate in Short to Medium Term
7.	Dublin scope future urban growth to the south and west, noting 2019 Council decision to support investigating Leinad land south of existing township. Consider near coastal tourism role, agriculture, proximity to established industries and Carslake Industrial Area, community and open space facilities, recreation and sport, water reuse and necessary infrastructure. LTFP 28 Feb 2022	Investigate in Short to Medium Term
	Dublin Township Growth & Tourism Master Plan \$50k 22/23	
8.	Walking and Cycling Prepare walking and cycling plans as part of town/settlement plans. Take into account the 'link and place' approach, and improving amenity at transport stops	Investigate in Short to Medium Term
	<u> </u>	

9.	Design Quality establish measures addressing Council's approach to design quality of public realm, open space, and recreation and sport facilities. Consider universal design, surface quality to be fit for purpose, wayfinding, lighting, meeting required standards, water sensitive urban design, and energy efficiency.	Ongoing
10.	Settlement Plans progressively prepare integrated plans across living, business and tourism, and environment for the coastal and rural settlements. Work with local communities to support local facilities/services, including considering walking, cycling and recreation and sport. The intent is tailored plans for each settlement.	Ongoing
11.	Two Wells Health, Emergency and Welfare Services advocate for a suitable range, including associated with growth.	Ongoing
12.	Two Wells Recreation and Sport Needs understand needs (including scope of multi use centre and existing oval precinct). Have regard to Xavier School oval, sporting field, and potential for shared use. Consider possible opportunities for recreational vehicle parks, the Hicks land and indoor sporting, noting a 50,000 population is typically needed for viability. LTFP 28 Feb 2022 Social and Community Infrastructure Plan \$100k 22/23 Open Space & Recreation Strategy \$60k 22/23 Stage 1 Two Wells/Mallala Ovals Master Plan \$100k 22/23 Key Liaison Office of Recreation, Sport and Racing, City of Playford	Investigate in Short Term
13.	Two Wells Recreation and Sport Hubs following investigations and master planning, establish suitable community recreation and sport hubs. This may be an expanded Two Wells Oval Recreation and Sport Precinct, augmented offerings near/at Xavier, a northern precinct noting potential growth at Hicks, and a range of neighbourhood and local hubs. Ensure facilities include water and energy saving features, meet required standards, and are lit and of suitable surface quality to be fit for purpose.	Medium Term

14.	Two Wells Community/Civic Hub - investigate needs and contemporary Council multi use options (business, community, cultural) to inform master planning for multi use facilities. Consider existing facilities including community centre. LTFP 28 Feb 2022 Social and Community Infrastructure Plan \$100k 22/23	Ongoing
15.	Two Wells CWMS for the original township, establish a CWMS following investigations and engagement. (study with LGA underway)	Investigate in Short Term
16.	Liberty and Eden Estates – partner with Hickinbotham Group based on the agreed Deed	Ongoing
17.	Two Wells Transport Options advocate and plan for: Appropriate public transport provision, including investigating and planning for an interchange including with a park n ride facility. Electric vehicle charging points Key Liaison Department of Infrastructure and Transport	Ongoing
18.	Two Wells Housing Options Increase housing options through amending the Planning and Design Code associated with increased hazard protection arising from the levee and having a planned approach consequent on the original township CWMS. Consider options to support partnership development proposals for higher density and mixed use, as well as health, aged care and mixed tenure on large sites.	Investigate in Short Term
19.	Two Wells Walking and Cycling Prepare walking and cycling plan. Take into account the 'link and place' approach, and improving amenity at transport stops (commenced)	Short Term
20.	Two Wells Golf Club – Noting services a regional market and majority of land owned by Council, work with the Golf Club to establish a vision and delivery plan. seek increasing water and energy saving in recreation and sport infrastructure Amend relevant Actions and Background Paper about recreation and sport facilities meeting required standards and being lit and of suitable surface quality to be fit for purpose	Ongoing

21.	Two Wells Hicks land scope future urban growth, noting in principle support to investigate decision of Council in 2019. Consider housing mix, recreation and sport, water reuse, the train line and Mallala Road, and orderly connections with Two Wells. The potential urban development of the Hicks land immediately to the east of Liberty and separated by Mallala Road and the ARTC train line will need to involve the Hickinbotham Group, DIT and ARTC as key stakeholders amongst others. Continue with Growth Strategy action seeking the urban development of the Hick's land, noting this involves seeking lifting of the Environment and Food Production Area, rezoning, and suitable infrastructure agreements.	
-----	---	--

Emerging Economy

Strategic Plan 2021 2024

Facilitate growth of the business sector through strategic advocacy, partnerships and service improvements that generate local procurement and employment opportunities, provide certainty for investment and enhance the appeal and visitor experience delivered by Council's key tourism strengths and opportunities.

- Support the growth of primary industries and the introduction of value add employment generators
- Facilitate greater access to local opportunities from public and private investment
- Reinforce Adelaide Plains Council as a place of choice for business, residents and visitors.

What do We Know

The Planning and Design Code contains the policy against which proposed development is assessed. After significant investigations, the Code was established in 2021. How well the Code enables or discourages appropriate development to grow the economy needs monitoring.

Tourism experiences are centred on key attractors, notably the Adelaide International Bird Sanctuary National Park Winaityinaityi Pangkara and Mallala Motor Sport Park. Town centres play a key role for local businesses and economically.

Agriculture is changing, with greater value adding on farm and in commercial operations. Horticultural and agribusiness growth is supported in the southern part of Adelaide Plains around Two Wells, noting current water challenges.

Emerging Economy Strategies

- 1. Foster envisaged business, visitor, and living growth through:
 - a. Targeted reviews to ensure policy and regulatory arrangements including the SA planning system are current. This includes around agriculture, renewables, town centres, and tourism.
 - b. Advocating and planning for needed infrastructure

- 2. **Pursue a vision of value-added agricultural businesses** providing localised employment around liveable towns and settlements. This includes a vision of including horticulture and animal husbandry south of the Light River around a growing Two Wells township and through Lewiston
- 3. Foster established town centres, principally at Two Wells Main Street, Mallala Town Centre and centre functions at Dublin.

Emerging Economy Action Plan

	Actions	Timing
1.	Development Trends monitor agricultural, horticultural, value adding, retail and tourism development trends in order to test the currency of the Planning and Design Code including land supply/allotment sizes/EFPA to support appropriate economic development of Adelaide Plains. This includes: Agricultural and food based business clustering, precincts and estates near townships Hubs around infrastructure Adventure and tourism based, such as motorsport, equestrian, gun clubs, shorebirds and coastal.	Ongoing
2.	Water advocate for suitable pricing for the NAIS water (underway)	Investigate in Short to Medium Term
3.	Renewable Energy investigate and foster take up, including associated with primary production	Ongoing
4.	Transport plan and advocate for integrated transport planning to service living and business, including connecting with Ports in Adelaide, interstate, air based, and for a suitable range of community and public transport. Consider all the modes including passenger and business vehicles, trains and buses, walking, cycling and equine. Amend Transport Action to reflect intent to plan for road/trail networks including for physical activity. Key Liaison Department of Infrastructure and Transport.	Ongoing
5.	Employment Land Plan adopt a coordinated approach to establishing employment precincts, such as Carslake Road, with appeal and necessary infrastructure	Investigate in Short to Medium Term

6.	Two Wells Main Street reinforce the primary role of the Two Wells mainstreet.	Investigate in Short to Medium Term
	This includes:	
	Upgrade the main street public realm	
	Progress the 8HA Crown land development for a mix of commercial, retail and community facilities.	
	 Support the development of large undeveloped sites near the main street for increased housing choice, aged housing, short term workers accommodation, and for visitor accommodation (including recreational vehicle parks). 	
	 Planning for a variety of movement modes, including walking, cycling, business needs, buses, recreational vehicles, and visitors. 	
7.	Northern Two Wells Investigate need for neighbourhood space and orderly approach to any retail in the northern part of Two Wells, in particular as part of investigations for the Hicks land. Any retail cannot be of a size to threaten the primary function of the Two Wells Main Street.	Investigate in Short Term
	Two Wells Northern Centre investigate and advocate for an orderly approach to centre planning in the northern part of Two Wells.	

Remarkable Landscapes

Strategic Plan 2021 2024

Advocate for Government investment in the Gawler and Light River Catchments and coastal townships, liaise with and support agencies responsible for adverse event mitigation and response, maintain a mix of waste management services and increase community education and lever volunteering opportunities and multiple State agency agendas to target the enhancement of coastal visitor experiences.

- Protect and enhance our coastal and riverine landscapes, native vegetation and heritage
- Mitigate the impacts of adverse natural events on the community
- Improve resource recovery and carbon and waste management.

What do We Know

Adelaide Plains has distinct rural and coastal landscapes, with the Adelaide International Bird Sanctuary dominating the coast. More work is needed to enable visitors and residents to fully experience these in suitable ways.

Suitable policy and supportive measures for built heritage are being progressed, with a review of the 1983 heritage survey commencing in 2021.

Whilst much work has been completed around greening, habitat and waste, more work to maximise benefits from these areas is needed.

Planning and Land Use Services (state government) are undertaking investigations and Amendments to the Planning and Design Code with respect to the hazard of fire and flood risk associated with Gawler and Light Rivers. These are SA wide investigations. Ongoing investigations are underway with respect to managing flood risk by the Gawler River Flood Management Authority. With grant funding, at Two Wells, Council is installing a levee to the east and south of town to reduce the hazard impact associated with Gawler River. Regarding coastal inundation, past studies are informing contemporary Community Emergency Management Plans for each settlement. Past studies identify particular hazards at Middle Beach. Better planning for risk improves investment potential.

Remarkable Landscape Strategies

- 1. Conserve rural and coastal landscapes and vegetation of biodiversity against the pressures of projected population growth.
- 2. Increase visitor and resident experiences through leveraging coastal and rural landscapes and vegetation augmented by private and public investment.
- 3. Advocate for recreation opportunities associated with Gawler and Light Rivers, and the coast.
- 4. Protect and support heritage properties assessed as being of value.
- 5. Reduce the waste and energy footprint of new development.
- 6. Manage impact of fire, flood and inundation risk through having contemporary development guidelines based on professional investigations.

Remarkable Landscape Action Plan

	Actions	Timing
1.	Visitor and Resident Experiences pursue opportunities to establish private and public infrastructure to enable visitor and resident experiences, such as: - Trails strategy for walking, cycling and equine - Associated with the Adelaide International Bird Sanctuary and coastal settlements, as well as the Gawler and Light Rivers. - Associated with landscaped based recreation, including walking, cycling, equine, and adventure based. - Visitor accommodation options - Cohesive visual approach to entrances and other physical features of towns - Supportive SA Planning system.	Ongoing
2.	Heritage Conservation In consultation with owners, progress heritage designation of buildings assessed as being of heritage value (Stage 1).	Investigate in Short Term
3.	Heritage Conservation Undertake further assessments of heritage value, building on the updating of heritage survey in 2021 LTFP 28 Feb 2022	Investigate in Medium Term

	Heritage Survey Part 2 \$27k 22/23	
4.	Heritage Support Establish heritage advisory service and incentives scheme.	Ongoing
5.	 Greening and Canopy investigate options, including: townships as built features increase, in particular:	Ongoing
6.	Habitat restoration investigate opportunities for large scale habitat restoration.	Ongoing
7.	Waste investigate options to reduce waste associated with new development. This includes fostering the circular economy.	Investigate in Short to Medium Term
8.	Carbon Footprint investigate options to reduce carbon footprint associated with new development.	Investigate in Short to Medium Term
9.	Fire Risk Participate in the investigations and Code Amendment underway by Planning and Land Use Services and CFS (SA Government) to better guide development. Better planning for fire risk improves investment potential.	Investigate in Short Term
10.	Gawler and Light River Flood Risk Participate in the investigations and Code Amendment underway by Planning and Land Use Services (SA Government) to better guide development. Seek least impact on agricultural productivity associated with flood mitigation.	Investigate in Short Term
11.	Coastal Inundation Risk update Community Emergency Management Plans for each coastal settlement coordinated with asset planning. Noting the particular hazard profile at Middle Beach, consider the best long term approach for Middle Beach. Better planning for inundation risk improves investment potential, including for tourism based purposes.	Investigate in Short to Medium Term

Proactive Leadership

Strategic Plan 2021 2024

Proactive engagement in new and existing regional partnerships, pursuit of funding and exploration of new revenue opportunities will create value for the region and rate payers. Early engagement in reform will support opportunities for continuous improvement. Setting a strategic financial agenda with regard to sustainability ratios will open up investment opportunities for the delivery of Council's strategic plan, and a continued emphasis on engagement and consultation will raise awareness, understanding and participation by an increasingly active community regarding Council's intent and progress.

- Actively seek funding and partnerships to deliver Council initiatives
- Actively engage with and inform our communities
- Strategic and sustainable financial management
- Proactively engage in Local Government Reform and continuous improvement.

What do We Know

As a service and infrastructure organisation, Council needs a coordinated approach to managing and facilitating growth that leads to liveable and economic towns, settlements and districts. A strategy for growth informs operational and service decisions, including how Council works with local business and residents, local groups, other spheres of government, other councils, infrastructure providers, and the development sector.

Funding Opportunities

- Council Long Term Financial Plan
- Private Funding Developer Contributions
- State and Commonwealth Government Funding, including:
 - o Planning and Development Fund

The level of success in achieving the GSAP depends upon cooperation between the public and private sectors, in particular:

(a) Adelaide Plains Council:

- (ii) Promote the GSAP to all levels of government, private sector partners and the South Australian community, creating the necessary impetus to generate positive change.
- (iii) Provide a framework for influencing the SA Planning System, including amending the Planning and Design Code, to support the GSAP.
- (iv) Updating the GSAP to ensure it remains relevant.
- (i) Continue its holistic, whole of government, approach to decisions to ensure that support the GSAP, including integrating with all Council's strategic documents including:
 - o Long term financial plan
 - o Tourism and Economic Development Strategy
 - o Recreation and Open Space Strategies
 - o Asset Management Plans
 - o Social and Community Service Plans
 - o Environmental Plans
 - o Other plans.
- (b) State Government:
- (i) Improve strategic transport links with metropolitan Adelaide aligning with the GSAP.
- (ii) Support public service provision and incorporation of GSAP policies into the 30 Year Plan for Greater Adelaide, and where relevant, the Planning and Design Code.
- (c) Infrastructure/utilities providers, to deliver, in a timely, coordinated and efficient manner, all transport, water, gas, electricity, information and communication technology, health and community services infrastructure required to support the GSAP.
- (d) Land owners and developers:
- (i) Participate in planning that supports the GSAP.
- (ii) Enter into agreements with Council and State Government to fund infrastructure to support the GSAP.

- (iii) Work with Council to establish and promote a consistent and recognisable Adelaide Plains offering for marketing and promotion of major developments.
- (iv) Provide affordable and diverse housing.
- (e) Australian Government to support policies and initiatives including grant funding that aligns with the GSAP.

The impact of above actions not being undertaken will need to be considered and the GSAP reviewed as necessary.

Proactive Leadership Strategies

- 1. Partner with the State Planning Commission and other Australian, State and local government entities to pursue liveable growth outcomes
- 2. Maintain working relationships with economic, living and environmental groups of Adelaide Plains
- 3. Share information and engage with the Adelaide Plains community to influence liveable growth.
- 4. Ensure the SA Planning System is aligned with Council's outcomes and up to date for trends impacting Adelaide Plains. This includes the Planning and Design Code
- 5. Provide excellent customer service for people looking to invest and undertake development.

Proactive Leadership Action Plan

	Actions	Timing
1.	Maintain formal and informal links with the State Planning Commission and Planning and Land Use Services	Ongoing
2.	Maintain collaborative relationships with local economic, living and environmental groups in progressing the actions. Work together based on values of integrity, respect, professionalism, innovation and open mindedness.	Ongoing
3.	Foster the Adelaide Plains Business Advisory Group in shaping and supporting delivery of the Tourism and Economic Development Strategy and relevant growth strategies and actions.	Ongoing

4.	Make information available and establish a planned approach to engagement about projects arising from the GSAP. This includes having a planned approach to community and stakeholder information and engagement for each project.	Ongoing
5.	Reference the GSAP in Council long term planning, including the Long Term Financial Plan and Asset Planning, and in applications for grant funding	Ongoing

GROWTH BACKGROUND PAPER



May 2023

Contents

Purpose	4
About Growth	4
About Adelaide Plains	4
OBSERVATIONS	5
30 Year Plan for Greater Adelaide	7
Liveable Growth	7
Planned Urban Growth	8
Investigations Undertaken and Underway	10
Population and Development Trends	12
Residents	12
Residential Building Approvals	14
Value of Approvals	15
Jobs Growth/Employment	16
Current and Emerging Community Profile	18
Resident Satisfaction	24
Housing	25
Towns and Settlements	29
Two Wells	29
Two Wells Main Street and Town Centre	30
Two Wells Original Township – Large Sites - CWMS - Levee	31
Potential Urban Growth – Hicks Land	33
Mallala	35
Dublin	36
Lewiston	39
Coastal & Rural Settlements	43
Economic and Social Facilities	44
Social Infrastructure and Community Services	44
Recreation and Sport Trends	50
Two Wells Recreation and Sport Infrastructure	51
Tourism Infrastructure	55
Telecommunication Black Spots	56

Utilities Infrastructure	58
Northern Adelaide Food Bowl and Irrigation Scheme	59
Council Assets	62
Transport	64
Car/Bus/Community Transport	64
Road and Rail Network	66
Electric Vehicles	67
Walking/Cycling/Equine	68
Environment	69
Natural Resource Management	69
Fire and Flood Hazards	70
Climate Forecasts to 2100	71
Heritage	74
Projected Urban Growth Rate 2021 - 2041	76
Comparing Two Wells and Mt Barker	80
Options for Future Planned Urban Growth	81
Local Government Impacts	82
Attachment A - 30 YEAR PLAN FOR GREATER ADELAIDE	83
Targets	83
Policies – Transit Corridors, Growth Areas and Activity Centres	85
Policies – Design Quality	85
Policies – Heritage	86
Policies – Housing Mix, Affordability and Competitiveness	86
Policies – Health, Wellbeing and Inclusion	87
Policies – The economy and jobs	89
Policies – Transport	91
Policies – Infrastructure	91
Policies – Biodoiversity	93
Policies – Open Space, Sport and Recreation	93
Policies – Climate Change	94
Policies – Water	96
Policies – Emergency Management and Hazard Avoidance	96

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

Version	Comment
May 2023	Adopted 24 April 2023
April 2023	Refined following consultation
July 2022	Consultation ABS 2021 data available added.
July 2022	Consultation
August 2021	Council 23 August 2021

Purpose

The purpose of this paper is to summarise opportunities and constraints relating to the growth of Adelaide Plains.

The paper will inform staff, Councillors, other spheres of government, infrastructure entities, and local residents and businesses of issues to consider as urban growth continues.

This Paper informs the Growth Strategy and Action Plan.

About Growth

This background paper is focussed on urban growth (what can be called 'planned urban growth') that is both occurring, and will occur, in Adelaide Plains.

The key component of urban growth to date is residential growth at Two Wells. The background paper begins to address the issues that this growth will present to Council, along with the additional demands associated with this residential growth e.g. employment and services, and the opportunities this presents to Council and the community.

This paper includes summary information about economic growth recognising the relationship between residential and economic growth. This paper also provides an overview of recent and forecast long term growth influencing Adelaide Plains and draws observations about the challenges to be planned for.

About Adelaide Plains

Adelaide Plains Council is a vibrant community located about 45 kilometres north of the Adelaide CBD. With large areas of rural and horticultural land, Adelaide Plains Council also has a large tidal coastal region (47 kilometres of coast) facing the Gulf of St Vincent, a number of vibrant and historic townships and settlements and a rapidly growing urban areas in and around Lewiston and Two Wells.

Covering an area of 935 square Kilometres and containing both the Light River and Gawler River, along with almost 6000 rateable properties the Adelaide Plains Council provides a diverse economic base with a strong community focus. It is a place where people can choose to live and work locally, with quality services, facilities and open space that support community wellbeing and resilience. Adelaide Plains Council promotes the growth of tourism and encourages is a place that provides local opportunities.

OBSERVATIONS

Economic Growth is Bringing Change

- 1. Agriculture is changing, with greater value adding on farm and in commercial operations.
- 2. Horticultural growth is supported, particularly in the southern part of Adelaide Plains around Two Wells, noting current water challenges
- 3. Land for animal husbandry is being impacted by urban growth, bringing change in Lewiston.
- 4. Tourism experiences are centred around key attractors, notably the Adelaide International Bird Sanctuary National Park Winaityinaityi Pangkara and Mallala Motor Sport Park

Urban Growth is rapidly changing Adelaide Plains

- 5. Urban growth is impacting Two Wells, Adelaide Plains and northern Adelaide.
- 6. Demand at Two Wells is being driven by available and serviced land, government stimulus, the northern connector, and opening of facilities such as Xavier College.
- 7. 2021 ABS indicates growth in a younger population at Two Wells.
- 8. Two Wells is forecast to grow to around 10,500 in 2041. This is 5.8% per annum from 2016. By comparison, Mount Barker is 4.25% per annum. The numbers in the 2012 Two Wells Amendment were indicative and dependent on land development layouts, school and open space provision. Given the current and proposed development pattern, it is considered unlikely that Liberty would reach in excess of 3000 allotments. The Hickinbotham Group have progressed Eden, with the 265 lots mostly developed. Liberty envisages some 1,900 lots, noting the zoning allows upto around 3,000 lots.
- 9. Planned urban growth is yet to be taken up at Mallala.
- 10. Adelaide Plains population is likely to grow from 9,655 in 2021 to 18 19,000 by 2041 (20 years)

Options for Future Planned Urban Growth

11. Council decisions of 2019 support investigations for further planned urban growth at Two Wells (Hicks Land) and Dublin.

Council's Role in Growth

- 12. As a service and infrastructure organisation, Council needs a coordinated approach to managing and facilitating growth that leads to liveable and economic towns and districts, and in managing hazards.
- 13. A strategic growth perspective informs Council's operational and service decisions
- 14. A strategic growth perspective informs the role of State and Australian governments, and development, infrastructure and community partners.

Ongoing Investigations and Planning Is Needed

- 15. We have inadequate understanding about what demographics are forecast to move into Two Wells e.g. while total numbers can be estimated, population structure, age and composition still requires further investigation
- 16. What social infrastructure does a growing Two Wells need? How does growth impact Council's direct role in libraries, recreation, sport, parks and culture? How does growth impact the viability of public transport at Two Wells? What transport network might best serve a growing horticultural area and Two Wells township?
- 17. Investigations and discussions are needed to address these emerging gaps and further plans for the urban growth that is already underway and will continue over the next 20 years.

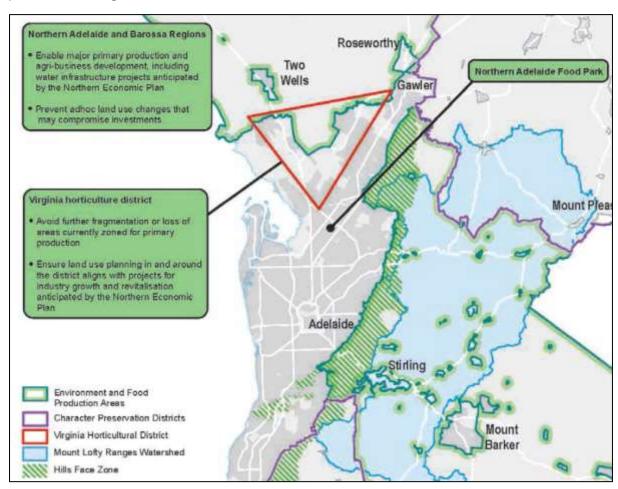
30 Year Plan for Greater Adelaide

Liveable Growth

The 30 Year Plan for Greater Adelaide¹ plans a region that is liveable, economically competitive, sustainable and responsive to climate change.

The Plans policies have been analysed for relevancy for Adelaide Plains (**Attachment A**).

Aside from towns and settlements, all of Adelaide Plains is within the Environment and Food Production Area, with the Two Wells and Lewiston area part of the Virginia Horticulture District.



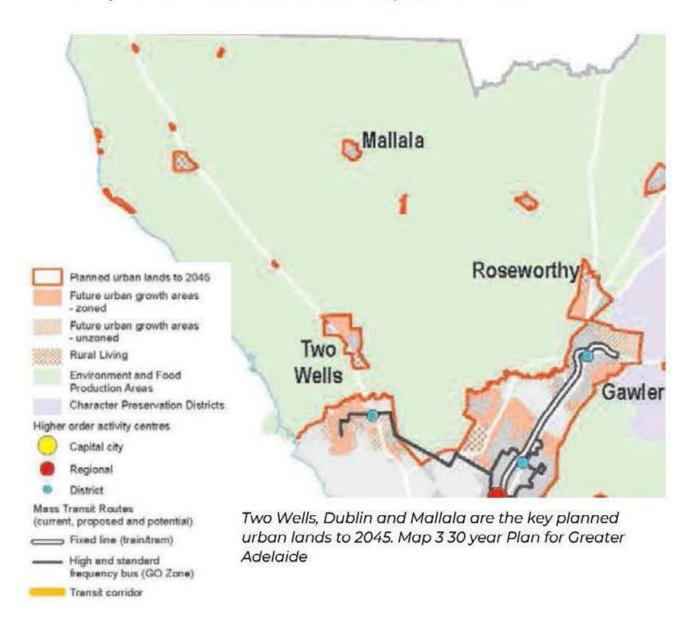
Two Wells/Lewiston is part of the Environment and Food Production Area and the Virginia Horticulture District. Map 3 30 year Plan for Greater Adelaide

7

¹ livingadelaide.sa.gov.au/

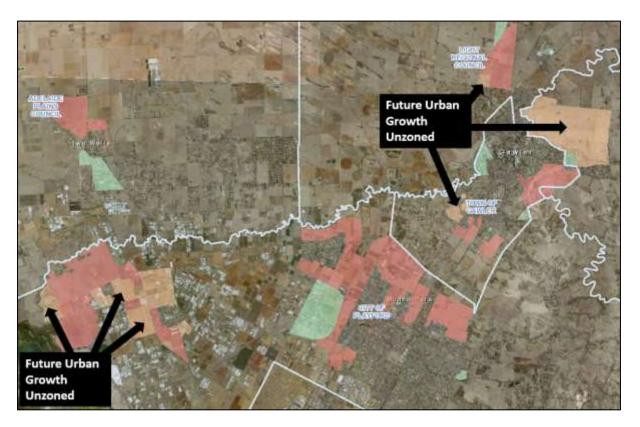
Planned Urban Growth

The 30 Year Plan identifies planned urban lands to 2045. This includes land already zoned and land to be zoned at some point in the future.



These extracts from the 30 Year Plan for Greater Adelaide demonstrate the significant areas of growth proposed within the Northern Adelaide Plains, including Adelaide Plains Council. Planned and future urban growth areas will require associated physical and social infrastructure to cater for the incoming population to this region.

Significant land areas are flagged for future urban growth but are yet to be released for that purpose by being rezoned. This includes land in Virginia east of the new Riverlea as well as east of Gawler.



Significant Areas are planned but yet to be rezoned For Future Urban Growth around Virginia and Gawler

The northern edge of Adelaide is planned for significant fringe growth, including within Two Wells.

The goals and policies of the 30 Year Plan for Greater Adelaide – being updated over 2022 and 2023 -influence how growth is to occur in order to achieve towns and communities that are liveable, sustainable and competitive.

Investigations Undertaken and Underway

Understanding existing investigations assists to consider the scope of further investigations. Numerous studies including by Council inform current planning of Adelaide Plains. The table arranges studies based on each particular focus.

	Economic Focus	Social Focus	Environmental Focus
2022	Tourism and Economic Development Strategy Long Term Financial Plan	Equine Sector	Two Wells Traffic
2021	Planning and Design Code introduced	APC Office Accommodation (underway) Public Health Regional Heritage (underway) Trails (proposed) Cemetery Capacity	Gawler River flood study (underway)
2020	Two Wells CWMS Feasibility	Disability Access and Inclusion Plan Aged Housing	Adelaide International Bird Sanctuary Management Plan Two Wells Mainstreet Master Plan
2019	Hicks Two Wells/Leinad Dublin Rezoning Requests		Webb Beach Community Emergency Management Plan
2018	Food Bowl Development Plan Amendment	Residents Survey	
2017	Allied Food Industries Land Supply 2W2W Economic Corridor Accelerating Regional Growth from Two Wells to Whyalla		Gawler and Light River Floodplain Mapping Two Wells Stormwater Management
2015	NAIS Market Proving (Arris) Broadacre Farming	Lewiston Community Focal Points	

	Economic Focus	Social Focus	Environmental Focus
	(Dublin township		
	expansion - Minister		
	declined to support)		
	Equestrian/Horse		
	Keeping Precinct	.,	
2014	Mallala Township		Adaptation
	Development Plan		Frameworks for Middle
	Amendment		Beach, Thompson Beach, Webb Beach
	Two Wells Retail		and Parham
	Demand		
			Two Wells Traffic Study
	Strategic Directions		
	(Development Act S30)		
2013	Horticulture Framework		Coastal Settlements
			Adaptation
	Horticulture Plains State		
	of Play		
	Two Wells Residential		
	Development Plan Amendment		
	Amendment		
2012 &		Heritage 1983	Two Wells Main Street
earlier			Design Guidelines 2011
			Gawler River Open
			Space 2009

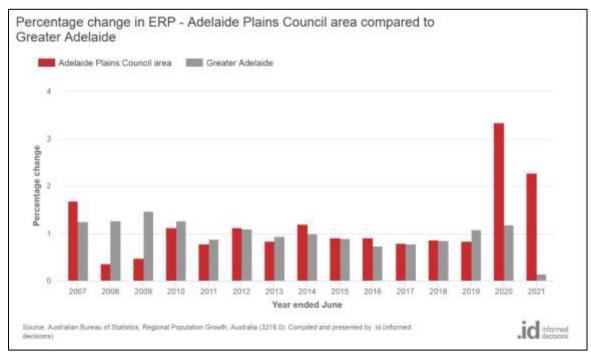
Population and Development Trends

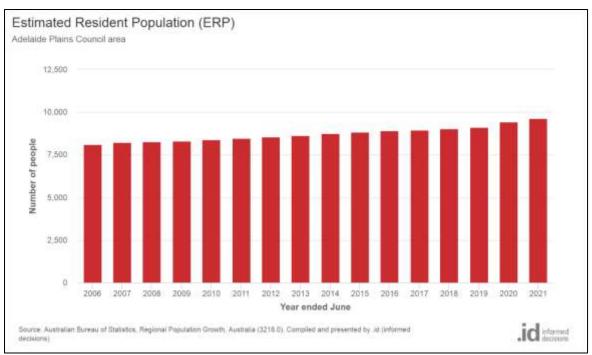
Residents

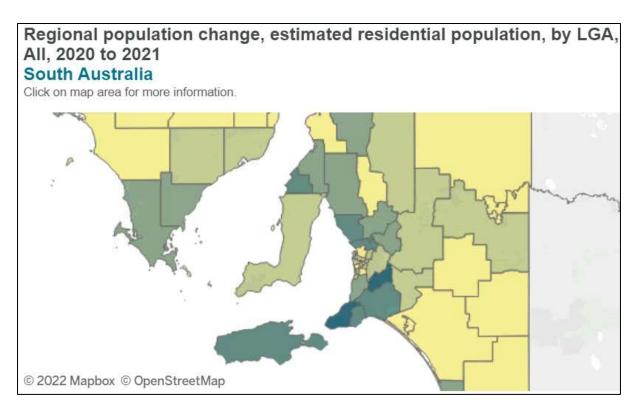
Council's residential population has grown steadily from around 8,100 in 2006 to an estimated 9,655 in 2021. When compared to Greater Adelaide, Adelaide Plain's rate of residential growth has mirrored Greater Adelaide's small increases, aside from being slightly greater in 2007 and 2014.

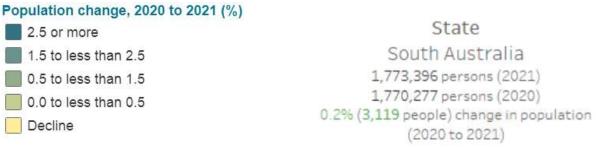
2020 saw a 3.3% rate of growth, and 2021, 2.3% in Adelaide Plains.

Both are markedly greater than Greater Adelaide's 1.2% in 2020 and 0.14% in 2021.









Adelaide Plains experienced 2.5% Population Change from 2019 to 2020, and 2.3% from 2020 to 2021

Within a Greater Adelaide context, along with Mt Barker and the CBD, Adelaide Plains experienced population change of 2.5% or more from 2019 to 2020².

13

² www.housingdata.gov.au/ accessed 27 May 2021

Residential Building Approvals

Since 2001, house approvals within Adelaide Plains have been around 50 – 70 each year.

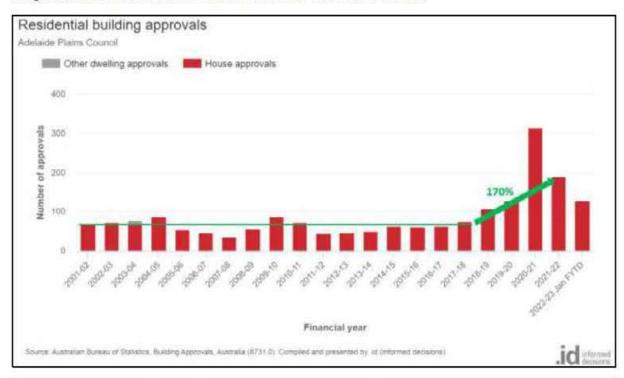
House approvals rose to 129 in 2019-20, 314 in 2020-21 and 189 in 2021-22.

If house approvals continue at around 189 per year, this is around 170% more than the average of 70 per year that was characeristic until around 2018.

Factors stimulating this rate include serviced and available greenfield land, government stimulus such as first home buyer and home builder, and the northern connector.

Adelaide Plains increasing dwelling growth rate is opposite to South Australia overall where rates have fallen annually since 2017-18.

Adelaide Plains increased rate of dwelling approvals was seen in Light and Playford till 2019-20 but reduced in 2020-21 similar to SA.



	17-18	18-19	19-20	20-21	21-22
Adelaide Plains	75	108	129 84% greater than 70 dwellings/annum typical 2001 - 2018	314 350% greater than 70 dwellings/annum typical 2001 - 2018	189
Light	66	73	98	163	122
Playford	819	940	1234	1495	1592

Dwelling Approvals Adelaide Plains Compared to Neighbouring Regions³

.

³ plan.sa.gov.au/state_snapshot/land_and_housing accessed 21 April 2021

Value of Approvals

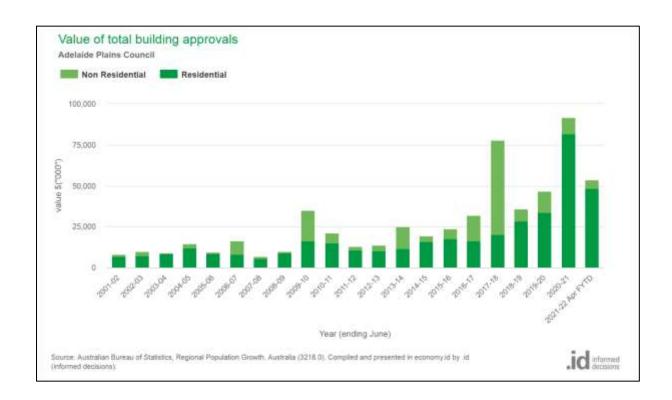
Value has typically been between \$10M and \$25M per annum. From 2016-17, value began to increase to around \$30M.

The \$75M of 2017-18 is possibly associated with capital works of Eden and Liberty subdivisions, and the new school (Xavier).

The subsequent value around \$40M - \$50M and \$92M in May 2021 is likely attributable to the larger numbers of house approvals.

Since the Foodbowl Development Plan Amendment of 2018, around \$9M/annum larger scale agribusiness development has occurred.

Value of approvals in Adelaide Plains has mirrored recent growth in building approvals. Increases in number and value of building approavals can also been seen in growth in rate revenue.



Jobs Growth/Employment

Within increased growth comes the requirement for a regional economy to provide additional employment in the local area or face capital being spent outside the regional as well as associated higher impacts on transport infrastructure and carbon emissions as employees travel to employment outside the region.

Main sectors of employment for residents of Adelaide Plains are:

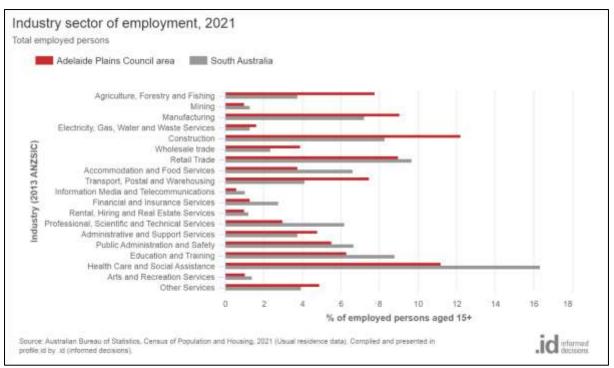
- Agriculture, Forestry and Fishing
- Manufacturing
- Construction
- Retail Trade
- Transport, Postal and Warehousing
- Health Care and Social Assistance.

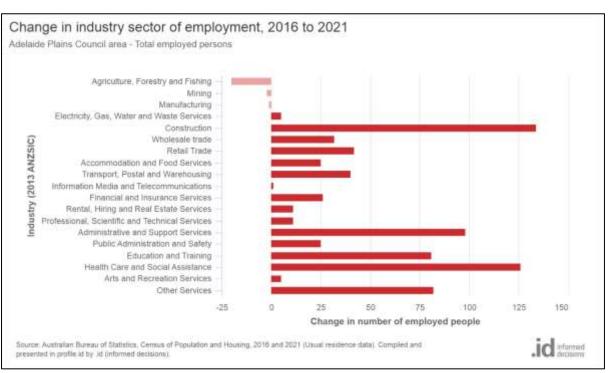
From 2016 to 2021, changes in industry sectors of employment have been pronounced in:

- Construction
- Administrative and Support Services
- Education and Training
- Health Care and Social Assistance
- Other Services.

As a % of SA jobs, Adelaide Plains local jobs have increased from 0.19% in 2006 to 0.35% in 2021. More residents are working in construction, administration, education, health care and other services.

	Adelaide Plains	Adelaide Plains Council		South Australia		
Year (ending June 30)	Number 🗢	%change =	Number =	%change ₹	Adelaide Plains Council as a % of South Australia \$	
2021	2,987	+7.74	854,282	+0.89	0.35	
2020	2,756	+4.34	846,660	-0.07	0.33	
2019	2,636	+19.45	847,230	+1.33	0.31	
2018	2,124	+6.72	835,928	+2.13	0.25	
2017	1,981	-6.11	818,141	+1.34	0.24	
2016	2,102	-	807,208	-	0.26	
2011	1,708		804,301	-	0.21	
2006	1,395	-	742,876	-	0.19	





Current and Emerging Community Profile

In 2021, Adelaide Plains Council area had higher proportion of children (under 18) and a lower proportion of persons aged 60 or older than Greater Adelaide.

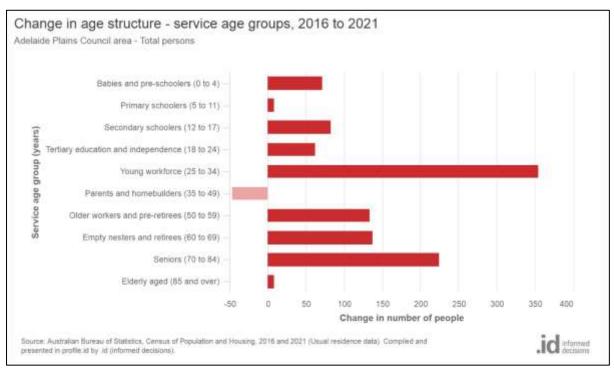
In 2021, the largest age group was 55 to 59 year olds. The group that changed the most since 2016 was 25 to 34 year-olds, increasing by 355 people.

The largest changes in age structure between 2016 and 2021 were in the age groups:

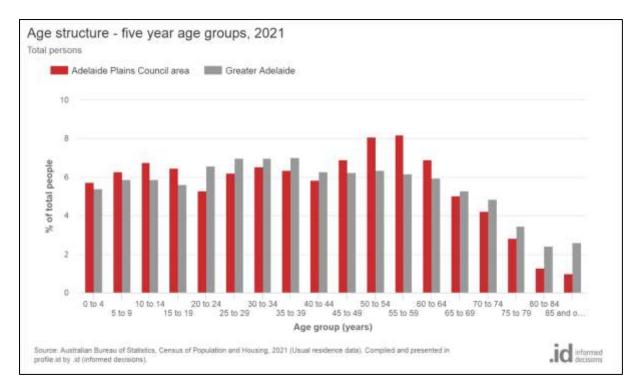
- 25 to 34 (+355 persons)
- 70 to 84 (+225 persons)

The major differences between Adelaide Plains and Greater Adelaide were:

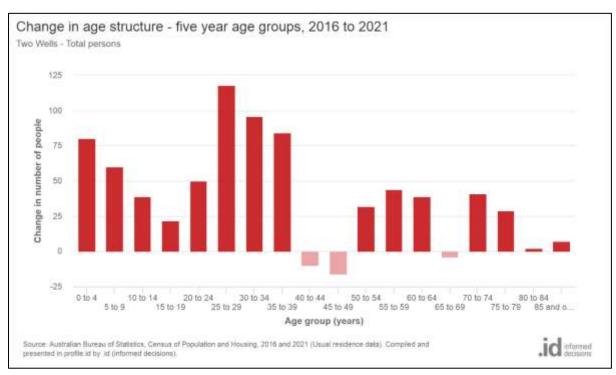
- A larger percentage of 'Older workers & pre-retirees' (16.3% compared to 12.6%)
- A larger percentage of 'Secondary schoolers' (8.3% compared to 6.9%)
- A smaller percentage of 'Seniors' (8.4% compared to 10.7%)
- A smaller percentage of 'Frail aged' (1.0% compared to 2.6%)



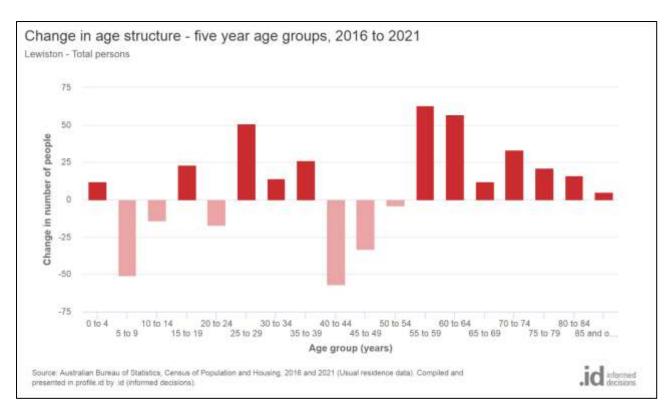
Adelaide Plains experienced growth in younger and family rearing ages as well as what can be called empty nesters (2016-2021)



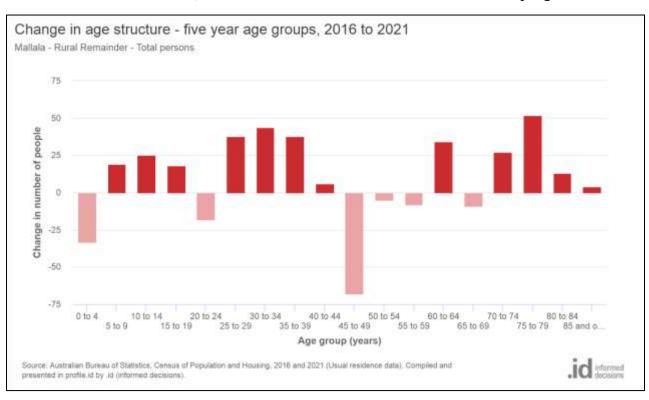
Compared to Greater Adelaide, Adelaide Plains has higher proportion of children, youth and empty nesters, and lower proportion of family rearing age, and retirees (2016-2021)



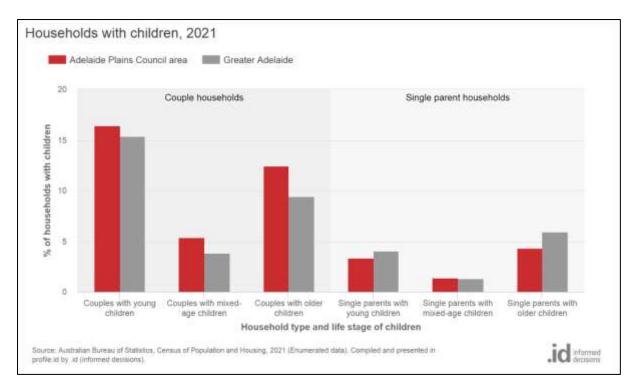
Two Wells from 2016 – 2021 has experienced growth in children, young adults, family rearing age, empty nesters and older retirees.



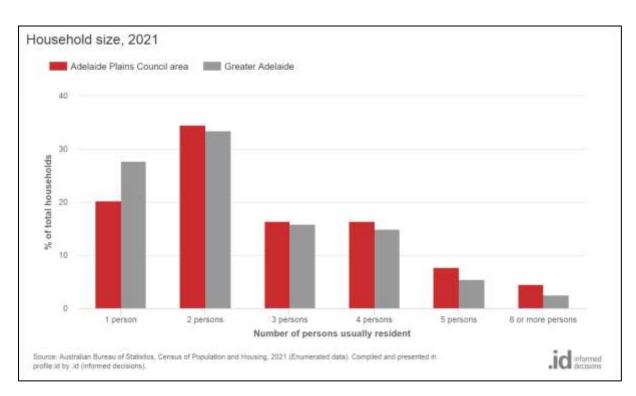
Lewiston from 2016 – 2021 has experienced growth in family rearing age, empty nesters and retirees, and a decline in children and mature family age



Mallala – Rural Remainder from 2016 – 2021 has experienced growth in children, family rearing age, older retirees, and decline in young children, young adults and mature families



Compared to Greater Adelaide, Adelaide Plains has higher proportions of couples with children

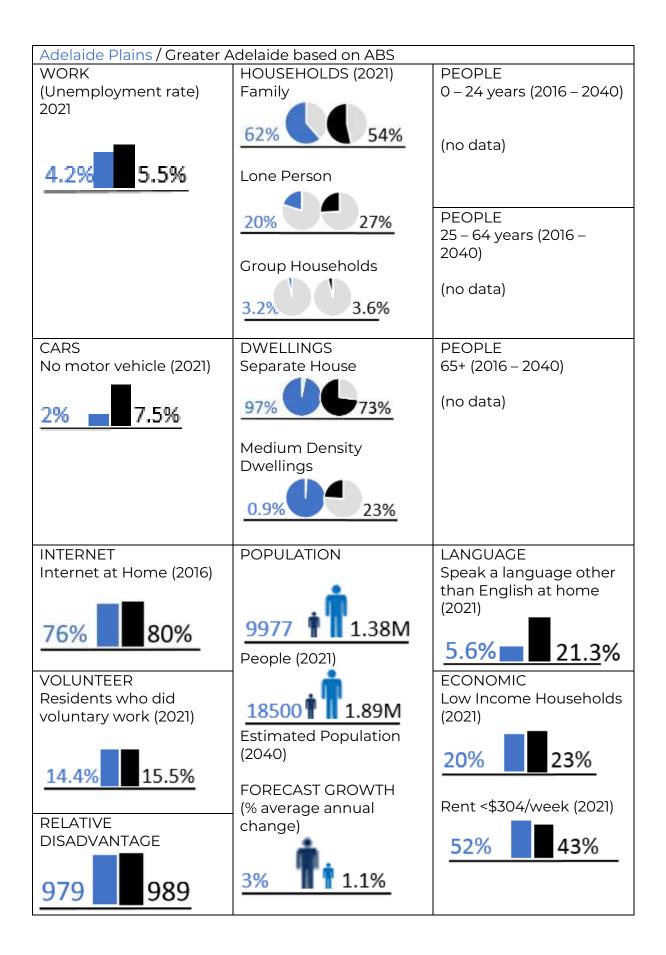


Compared to Greater Adelaide, Adelaide Plains has a lower proportions of single person households

Between 2016 and 2021, the LGA with the highest net migration to Adelaide Plains Council area (+383) was from Salisbury, whilst the highest net loss (-101) was to Gawler.

In 2021 compared to Greater Adelaide, there was a higher proportion of people in the younger age groups (0 to 17 years) and a lower proportion of people in the older age groups (60+ years). Overall, 22.6% of the population was aged between 0 and 17 compared to 20.5% for Greater Adelaide. 21.3% were aged 60 years and over, compared with 24.6% for Greater Adelaide.

Based on available data from the 2021 Census, families are moving to Adelaide Plains Council, in particular Two Wells and to a lesser extent, in Mallala-Rural Remainder. Lewiston and Mallala-Rural Remainder are experiencing ageing.



Resident Satisfaction

In line with 2018, Flood prevention, Health services and Employment most important to the community in 2022.

Of less importance in 2022 is Council funding opportunities for community groups and public transport.





ADELAIDE PLAINS COUNCIL | AUGUST 2022

020 Using a scale of 1 to 5, where 1 is not at all important and 5 is estremely important, how important are the following sected and environmental issues to you in relation to Council's tuture planning? Book All respondents (n-300).

RATING LEVEL Extremely High: 4.5 and above High: 4.0 - 4.4 45 Materials: 3.5 - 3.7 Mised: 2.5 - 3.4 Low: 2.4 and below

The 2022 residents survey⁴ affirmed the importance of planning for hazards, for health services, and employment.

A similar survey was underway in 2018.

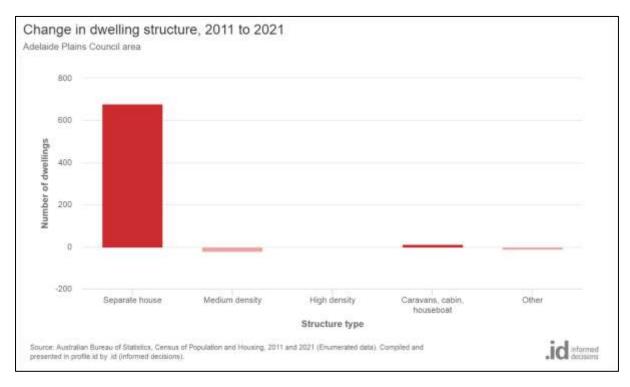
⁴ <u>PowerPoint Presentation (apc.sa.gov.au)</u>

Housing

The provision of affordable and suitable housing is part of the objectives within the SA Housing Authority's Our Housing Future 2020 – 2030⁵ and is guided through the provisions of the Planning and Design Code from an assessment and approval perspective. Growth planning should consider housing supply and housing choice through providing a mix of housing styles and sizes along with a variety of allotments types from smaller medium density sites to more traditional allotments.

A growing population also has clear implications on requirements for additional housing and services. Council is responsible for rezoning additional land for residential development and is responsible for some of the social and community services along with State and Australian Government service departments.

SA Housing Authority has units in Two Wells. A Local Affordable housing plan toolkit⁶ is available.

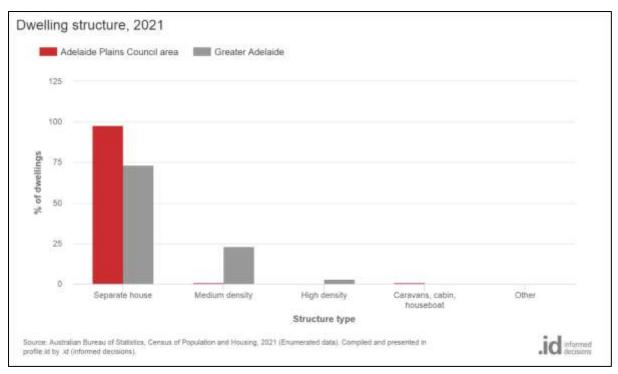


Across Adelaide Plains, from 2011 – 2021, growth in separate houses has been dominant, with a decline in medium density housing

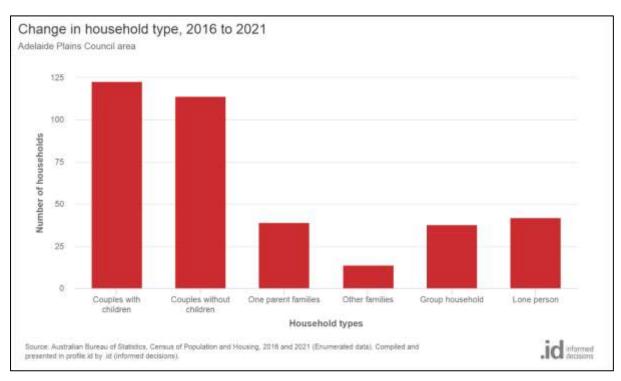
25

⁵ <u>housing.sa.gov.au/our-housing-future</u>

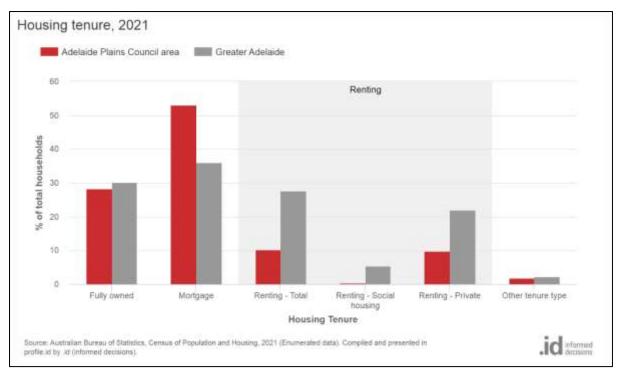
⁶ housing.sa.gov.au/documents/general/Local-Affordable-Housing-Plan-Toolkit.pdf



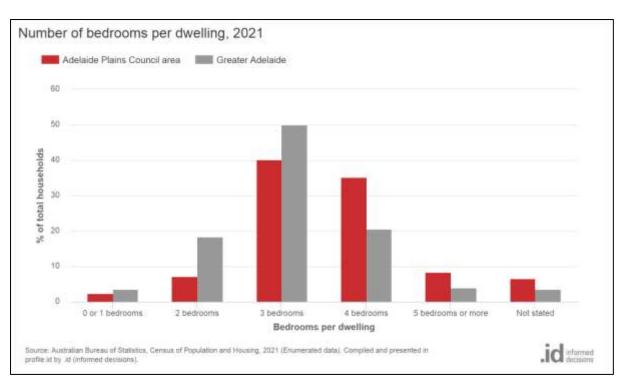
Compared to Greater Adelaide, Adelaide Plains is dominated by separate houses, with negligible other forms of housing.



Across Adelaide Plains, Greatest growth has been in couples, with and without children, with some growth in group and lone person households



In 2021, compared to Greater Adelaide, higher proportions of households had a mortgage, and fewer households rented privately. Adelaide Plains had negligible amounts of social housing.



Compared to Greater Adelaide, Adelaide Plains has lesser proportions of dwellings with 1 – 2 bedrooms, and greater proportions of dwellings with 4 or more bedrooms.

Regarding aged housing, in 2019, Council explored options for funding, operation and management of its existing retirement living portfolio. The intent was to ensure it continues to serve our older community.

Council identified several opportunities to increase the quantity and the quality of retirement living in Mallala and Two Wells.

The aged living review⁷ identified:

- several providers with interest in Adelaide Plains, including regarding land parcels identified for potential development
- The aged review identified a strong preference in Mallala and Two Wells for people to remain in their town as they age (e.g. local people do not want to have to leave Mallala to go to Two Wells and vice versa).

Regarding seasonal workers accommodation, this is important as part of attracting seasonal workers for agribusinesses. The Australian Government program encourages overseas seasonal workers and provides a range of information about legal, wellbeing and housing⁸. Several providers specialise in seasonal housing, be it through regular housing managed and available for seasonal workers or through temporary seasonal workers accommodation.

Amended regulations⁹ now fast track approvals of temporary accommodation for seasonal workers.

Adelaide Plains has limited housing choice for the growing number of lone and couple households or those in need of social housing.

Further work on housing mix and variety is required to plan township communities that provide a variety of housing choice to suit various individuals and groups – including aged and seasonal workers.

⁷ Aged Living Review, Urban and Regional Planning Solutions, 2021

⁸ palmscheme.gov.au/worker-support

plan.sa.gov.au/news/article/2021/new_regulations_fast_track_temporary_accommodation_for_seasonal_workers

Towns and Settlements

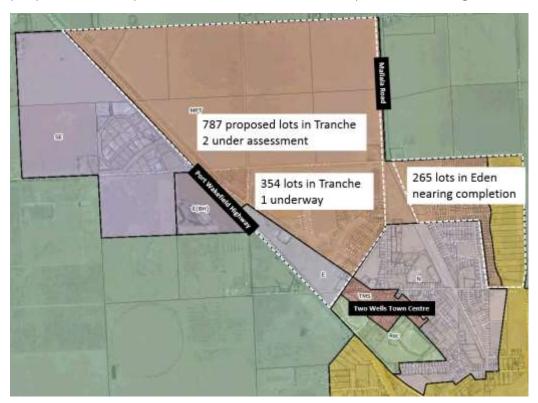
Two Wells

Hickinbotham Developments and Council have been working together since the mid-2000s to realise planned urban growth at Two Wells. This includes:

- 2007 Memorandum of Understanding
- 2012 Infrastructure Deeds
- 2013 Rezoning

In 2013, significant decisions were taken and the Two Wells Residential Development Plan Amendment was gazetted.

At the time, The Planning Minister stated "This DPA will allow for the provision of up to 3,400 new dwellings and up to 9,700 more residents living in Two Wells over the next 20-30 years. The Two Wells township expansion is a \$1.225 billion project creating more than 3,000 regional jobs during the next 20 years, including more than 450 jobs annually in the construction industry. The future needs of the community will be catered for with a new local centre, provision for a school, improved flood protection and an environmentally friendly design. It will also incorporate a community waste water treatment plant that will service the proposed development and internal buffers to protect existing land uses"



New subdivisions are planned to enable around 2,200 new dwellings over the next 10 – 20 years

The numbers in the 2012 Amendment were indicative and dependent on land development layouts, school and open space provision. Given the current and proposed development pattern, it is considered unlikely that Liberty would reach

in excess of 3000 allotments. Based on a Deed¹⁰ of 2012, the Hickinbotham Group have progressed the Eden land division, with the final lot settling in early 2023. The Liberty Estate envisages some 1,900 lots, noting the zoning allows up to around 3,000 lots. Tranche 1 with 354 lots is under development and Tranche 2 with 787 is proposed.

The Eden and Liberty housing estates contain modern housing on allotments of a variety of sizes, significant open spaces for recreation and active lifestyles, and effective stormwater and traffic management, Within the Liberty estate, Xavier College is established.

Council and Hickinbotham Developments will continue established arrangements to lead to the successful delivery of Eden and Liberty.

Two Wells Main Street and Town Centre

Old Port Wakefield Road is the village heart of the historic Two Wells township, housing local services, amenities and historical buildings. With a fast-growing population, Council is seeking to revitalise the 'village heart' of the town, guided by the vision and principles presented in the 2020 Two Wells Main Street Masterplan¹¹.

The 2020 Plan builds on the investigations and engagement captured in the 2011 Master Plan¹², and is underpinned by the 2019 retail study.

After years of planning, in 2022, Council strategic acquired eight hectares of 'Crown Land' for the purposes of delivering commercial, retail and community



¹⁰ Development Deed 7 November 2012 DC Mallala and Hickinbotham Developments

[&]quot; apc.sa.gov.au/__data/assets/pdf_file/0033/659760/Two-Wells-Main-Street-Master-Plan.pdf

¹² apc.sa.gov.au/__data/assets/pdf_file/0030/354855/D16-4102-Two-Wells-Urban-Design-Guidelines.pdf

facilities¹³. With the Adelaide Plains' population growing at an unprecedented rate, the purchase of this strategic landholding in the town centre of Two Wells positions our broader region for further substantial economic growth and will provide convenient access to amenities for residents and visitors alike.

The land is bound by the Port Wakefield Highway, Old Port Wakefield Road, Wells Road and Windmill Road with extensive exposure to arterials and the historic main street.

Two Wells Original Township - Large Sites - CWMS - Levee

Two Well's original township is a mix of cottages, dwellings built pre and post the two wars, and from the 1960's onwards. Some 20 large lots are used for non-residential purposes and can be characterised as underdeveloped.

The original township does not have a community wastewater management scheme (CWMS). One consequence is new housing needs site area of 1200sqm or greater to accommodate on site waste treatment. Original residential areas are mostly within a Neighbourhood Zone and partly a Rural Living Zone. Within the Neighbourhood Zone, a variety of small lot housing may be granted planning consent, including dwellings with site areas between 250 and 450 sqm, ancillary accommodation (akin to granny flats) and retirement housing, subject to minimum requirements for on-site treatment. However, until a CWMS is in place, housing sites need to be around 1200sqm.

Dwelling Type	Minimum Site Area (sqm)	Minimum Site Frontage (m)
Neighbourhood Zone		
Detached Dwelling	4501	15
Semi-Detached Row Dwellings (minimum of three)	3001	10
Group Dwelling (needs two or more)	350¹	20
Residential Flat Building (needs two or more)	2501	20
Ancillary Accommodation (on the same site as another dwelling)	(2)	12
Retirement Facility Supported Accommodation	-	
Rural Living Zone		
Detached Dwelling	10,000 (1HA)	

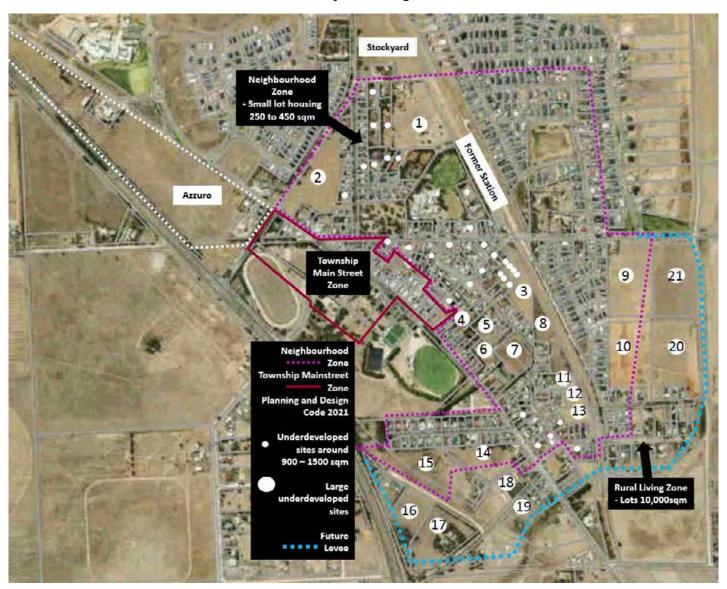
¹³ apc.sa.gov.au/our-council/major-projects/two-wells-investment

-

¹ Minimum 1200sqm is needed to accommodate on site waste treatment

Site Areas and Frontages Anticipated for new Housing in Two Well's Original Residential Areas

Council, SA Water and the LGA are investigating a CWMS. If introduced, new housing would not be constrained to sites of 1200sqm. In parallel, planning for a levee to the east and south is underway. Funding for the levee has been secured.



Potential Development Sites within the Township. Note funded levee location.

Should a CWMS be installed, analysis of development potential has been undertaken. Sites up to around 900sqm already developed with a relatively substantial house are unlikely to offer potential for additional dwellings. Sites of around 800 - 900sqm or greater with a lower value building or vacant offer potential for housing development. There are around 30 sites between 0.1HA and 0.7HA that offer this form of potential for housing development. Initial analysis identifies around 21 large sites developed with few buildings, with non-residential purposes or vacant. The large sites are generally between 0.7HA and 3HA. 15 are

within the Neighbourhood Zone and six within the Rural Living Zone. The 21 large sites and 30 sites together equate to some 52HA.

If 75% of large sites and 25% of small sites developed at 12 dwellings/HA, this would yield around 400 dwellings. If each dwellings has 2.67 residents on average, this is 1100 residents. If developed at 20 dwellings/HA 9 around 400sqm lots on average), this is 1900 residents.

The proposed levee potentially opens up several large sites and numerous smaller sites sited within the area of the proposed levee.

Development sites not included within this analysis include:

- Within the Township Main Street Zone
- Azzurro land of about 15HA within the Employment Zone
- Stockyard Lot, noting a land division is underway
- The former Train Station land under the care and control of ARTC.

Several zone boundaries don't follow title boundaries, e.g. large lots 14 and 15. Commercial land uses on north side of Gawler Road/Old Port Wakefield Road in the Neighbourhood Zone. Consider placing in Town Centre Zone.

On site greening policy will need review considering locations that densify through small lot housing, greening is recognised as critical to improve amenity, reduce heat load, and enable on site water infiltration.

Potential Urban Growth - Hicks Land

Initially supported in principle by Council in 2019, progressing the potential urban growth of the Hicks land is a key urban growth action for Two Wells.



The Hicks land at Two Wells is north of the Eden housing estate, and east of the railway line

During consultation on the growth strategy in 2022, Hicks expressed support for the growth strategy. In order to enable urban development of the Hicks land, the land would need to be rezoned with community engagement, the EFPA lifted through various processes including State Parliament., and suitable infrastructure deeds and suitable access arrangements regarding ARTC/DIT infrastructure in place.

The potential urban development of the Hicks land immediately to the east of Liberty and separated by Mallala Road and the ARTC train line will need to involve the Hickinbotham Group, DIT and ARTC as key stakeholders amongst others.

Temby Road level crossing would not support high traffic volumes or large vehicles given the short set back distance to Mallala Road. Rail activity within the corridor will only increase into the future, not decrease. Therefore, traffic management studies and risk assessments will need to be undertaken given the population forecast for Two Wells will exceed 10,000 by 2040, which is only 18 years away.

ARTC has a policy of no new level crossings, but is open to negotiating a reduction in the number of existing level crossings in exchange for a new or upgraded level crossing. It is likely grade separation (e.g., bridge over rail) may be required to avoid vehicles queuing during train movements and provide the connectivity over the rail corridor to ensure the future developments in Two Wells are not disjointed.

Potential urban development of the Hicks land – including suitable transport arrangements involving movements potentially impacting the train line - needs further investigation.

Along with the Planning and Design Code, Two Wells future is influenced by a possible CWMS for the original township, a levee, and a rezoning.

Small lot housing is potentially facilitated via establishment of a CWMS. This small lot housing is highly walkable to the main street and recreation facilities. Careful siting, design, and on-site greening is important, learning from infill development in metropolitan Adelaide.

If 1100 residents associated with CWMS is added to the two subdivisions, this could lead Two Wells population being 10,000 – 10,500. The proposed levee suggests investigating review of the Rural Living Zoning. Further investigations of the Hicks land are warranted.

Provided economic and market conditions continue favourably to support take up of lots, the Liberty development could be completed in ten to 15 years from now.

Mallala

The township of Mallala had 733 residents in 2016.

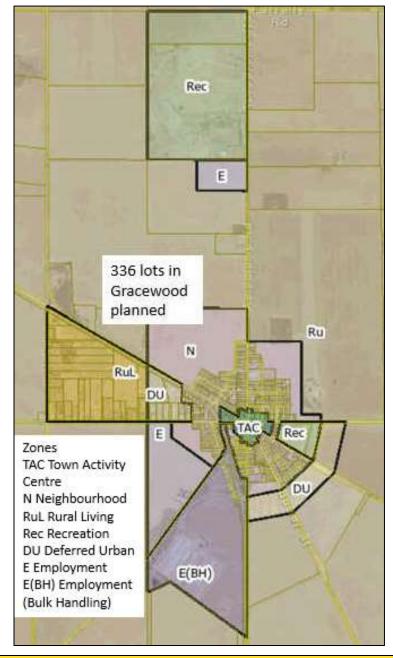
In 2014, the Mallala Township (Transport, Commercial and Minor Residential Zones Boundary Adjustment) Development Plan Amendment was approved. This rezoned 42HA for residential purposes and 22HA as deferred urban.

The Gracewood land division proposes to progressively establish 336 lots over the next 20 years.

336 lots developed at 2.67 residents/dwelling equates to 900 residents. Should this occur, and noting some potential infill within the town, in the long term, Mallala would be around 1600 – 1700 residents.

The first stage of Gracewood was lodged in 2019 but has not yet been approved.
Discussions are ongoing.

The Peregrine Group acquired the Mallala Motor Sport Park in 2017.

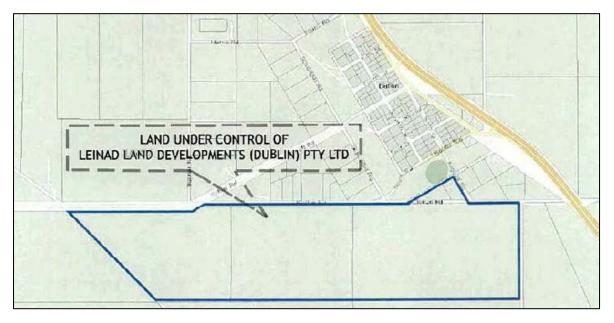


Mallala planned urban growth envisages a town of 1600 – 1700 residents. Further urban growth will increase demand for services.

Dublin

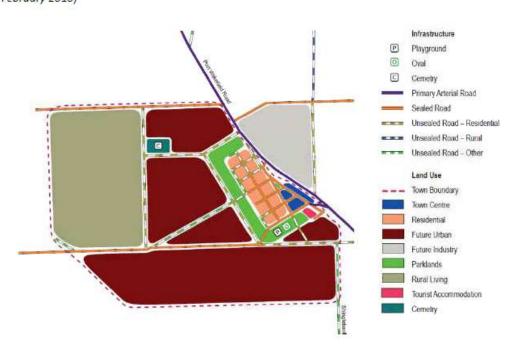
Dublin and its immediate adjacent agricultural areas had 405 residents in 2021

In response to a request from a private landowner, in 2015, Council proposed to rezone land. The Minister declined to support the rezoning due to other land available around Two Wells, Mallala and in Playford. Dublin was also seen as having limited facilities and low demand for land, with only 27 dwellings being built over the preceding decade.



Council's 2013 Strategic Directions Report contemplated Dublin's expansion.

Figure 5.1 Dublin Township Structure Plan (Source: Strategic Directions Report: Development Plan Review February 2013)



Leinad's submission to the 2022 growth strategy consultation outlines that Leinad control land abutting the south side of Ruskin Road and also land further south and west. Leinad seek to expand Dublin in an orderly, economic and sustainable manner. Expansion southwards will:

- Enable housing to the south of the Park Lands, as originally intended in the towns plan
- Strengthen and define the town centre and Parklands
- Enable reinstatement of the original rectilinear form of the Park Lands to the south of the town
- Bolster the country town lifestyle, act as a commuter settlement, and a gateway to coastal settlements.
- Underpin additional services and retail, and local jobs

Leinad support the Growth Strategy and seek to work cooperatively with Council.

Gurung and Wait made a submission to the 2022 growth strategy consultation. Their submissions suggested to rezone some existing Rural Living lots and expand the Rural Living Zone further west.

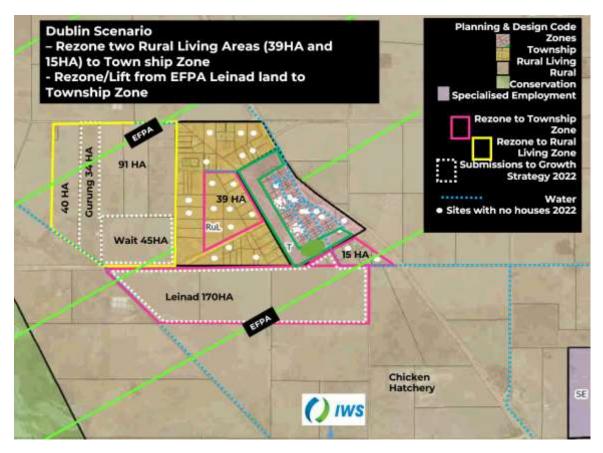
Under the scenario proposed in submissions by Leinad, Gurung and Wait:

- If the Leinad Land and Township Zoned former Rural Living lots are all developed at 6 dwellings/hectare, with 2.65 residents/dwelling, this yields potentially 3,500 residents.
- If the agricultural land rezoned to Rural Living is all developed with 1 HA lots, assuming 2.65 residents/dwelling, this yields potentially 500 residents.
- Added to Dublin's 405 residents of 2021, in total, Dublin could be in the order of 4,500.
- Accounting for the variability of owners intentions with land, if around 25% of sites are developed (rather than all sites), this entails Dublin could grow by 1000 to around 1400. If undertaken over 20 years to 2041, this rate of growth is 6% per annum, 1% higher than experienced at Two Wells from 2016 2021.
- If a 3% per annum rate of growth is experienced over 20 years to 2041, this is an increase of 345, leading to a total population of 750.

Council's 2015 request to rezone land at Dublin was not supported by the Minister for Planning at the time due to insufficient demand for housing. Various factors have changed including:

- Increasing employment in Adelaide Plains. Jobs in Adelaide Plains increased form 2,102 in 2016 to 2,987 in 2021. This is an increase from 0.26 to 0.35% of all jobs in SA
- northern expressway increasing convenience to metropolitan Adelaide
- increased interest in working from home.

Leinad advise in their submission that the Greater Adelaide Land Supply (2021) flags the need to accommodate an additional 115 dwellings per annum. Leinad also advise that in response to a call for expressions of interest, Leinad have received interest from 24 parties for lots between 1000 and 1800 sqm.



The scenario proposed in submissions by Leinad, Gurung and Wait involve expansion of the township zone to the west and south, and further Rural Living to the west

Council's Business Plan for 2022/23 contains a project to undertake the Dublin Township Growth and Tourism Master Plan. Staff have commenced preparing a Background Paper and informal discussions with local stakeholders about the Dublin District. This acknowledges planning for Dublin's growth needs to be informed by and complement the future of nearby coastal and rural settlements, agricultural areas and the Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara.

For Dublin, further investigations are needed around:

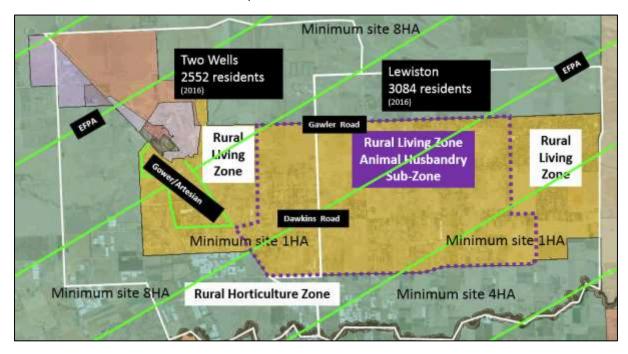
- opportunities to grow tourism and business experiences
- need for land supply release for housing, including rural living as transition to agriculture. Assessment of value of soil for food production and environmentally needs consideration
- potential for conflict with established uses, such as the chicken hatchery and waste facility to the south
- community infrastructure and open space
- hard infrastructure, e.g. sewer and water.

Dublin's future is influenced by its relative proximity to Greater Adelaide arising from the northern connector, employment growth, the Carslake Road Employment Area, the Adelaide International Bird Sanctuary and a historical rezoning request (see Options for Future Planned Urban Growth).

Lewiston

Lewiston had 3,310 residents in 2021, up from 3,084 in 2016¹⁴.

Lewiston is within the Environment and Food Production Area (EFPA). Recent years has seen a dog park established with the playground intersected by the shared horse trail. This is a focal point within Lewiston.



Two Wells and Lewiston's Rural Living Area is within the Environment and Food Production Area

Planning and Design Code

The Planning and Design Code¹⁵ nominates Lewiston for Rural Living, with the central area for Rural Living and Animal Husbandry. The Rural Living Animal Husbandry area has been planned for several decades to be developed for animal husbandry. The Rural Horticulture Zone surrounds Two Wells and Lewiston.

The Planning and Design Code continues this.

The total area of the Rural Living Zone, including the Animal Husbandry Subzone is 36sqkm. As an indicator of size, this is five times the size of Adelaide Airport.

¹⁴ ABS 2016

¹⁵ Planning and Design Code April 2021



Much of Lewiston is zoned for Rural Living purposes, with the central area zoned for Rural Living and Animal Husbandry purposes, and with Horticulture surrounding

The desired outcome of the Rural Living Zone is 'A spacious and secluded residential lifestyle within semi-rural or semi-natural environments, providing opportunities for a range of low-intensity rural activities and home-based business activities that complement that lifestyle choice.'

The Animal Husbandry Sub Zone has a desired outcome of 'Large-scale horse keeping and dog kennelling in association with detached dwellings on large allotments'

The Planning and Design Code provides for the following:

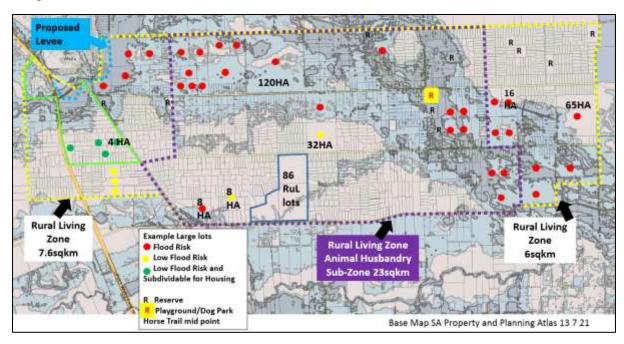
- Minimum site area is 1HA
- Residential development associated with animal keeping, shops up to 50sqm, or with light industry up to 100 sqm
- Division for residential living

Performance assessed

- Ancillary accommodation
- Detached dwelling
- Dwelling
- Group dwellings
- Retirement living
- Tourist accommodation
- Land division

This policy provides for a variety of activities that will continue to drive growth within Lewiston/Two Wells and subsequent population increases and likely demand for services in the future, subject to flood risk and provisions of the Environmental Food Protection Area (EFPA).

Larger Lots and Flood Risk



Two Wells / Lewiston Larger Lots and Flood Risk

The Two Wells / Lewiston Larger Lots and Flood Risk map shows:

- Flood risk impacts about half the area
- The red dots are 32 example large lots (typically larger than 8HA) impacted by flood risk
- The yellow dots are 2 example large lots with low flood risk
- Rural living lots are typically 20 times larger than the average suburban block.
- Remnant larger land holdings are mostly surrounded by 1 hectare land holdings.
- 86 rural living residential lots are being developed. These were lodged prior the EFPA limiting residential subdivision becoming operational in March 2019.

Environment and Food Production Area

The EFPA has been introduced to:

- protect our valuable food producing and rural areas as well as conserving our prized natural landscapes, and tourism and environmental resources
- support our sustainable growth and encourage the building of new homes in our existing urban footprint where supporting infrastructure already exists
- provide more certainty to food and wine producers as well as developers on the direction of future development in metropolitan Adelaide

The EFPA does not allow for the division of land for purely residential purposes.

Council made a submission¹⁶ to the 2021 Review of the EFPA by the State Planning Commission. Council advised it is open to the EFPA continuing in place over Two Wells / Lewiston

¹⁶ Refer full Adelaide Plains Council EFPA submission

Rural Living Zone and Animal Husbandry Subzone, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:

- The barrier of the EFPA limiting subdivision for low intensity residential living where associated with horse or dog keeping being corrected.
- The lack of the EFPA Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.

Recognising the distinct character of Lewiston and the Rural Living Areas of Two Wells, for the purpose of growth planning, these are called a 'settlement'

Lewiston is a mix of established rural living, rural living with associated animal husbandry, a network of reserves and interspersed large parcels in primary production. Factors influencing its future include:

- A variety of horse and dog based activities throughout
- Established rural living throughout
- NAIS water nearby to the south
- Interspersed reserves and the dog park/horse trail midpoint hub
- A shared trail network in the north east
- Sections of trails in the west
- Gawler Road as a more trafficked DIT road
- Flood risk
- Gawler River to the south
- Ongoing urban development nearby in Two Wells and south of Gawler River

Recognising 3084 residents in 2016 and land approved for division but yet to be released to market, Lewiston has potential for around 3,500 residents.

Better understanding these factors as well as the EFPA needs investigating.

Coastal & Rural Settlements

The coastal and rural areas have various settlements, with surrounding areas, with generally less than 200 people. All settlements are constrained by valuable agricultural or conservation land in their ability to accommodate further urban growth. The surrounding land is within the Environment and Food Production Area.

Whilst populations may increase slightly through redevelopment of existing residentially zoned land, the prospects for marked population growth do not exist.

The settlements are part of the social and economic life of Adelaide Plains.

	Coastal and Rural Settlement	Population	
		2016	2021
			ate Suburb' which cts around each
	COASTAL		
1.	Parham	216	185
2.	Webb Beach	47	40
3.	Thompson Beach	201	219
4.	Middle Beach	79	94
	RURAL		
5.	Wild Horse Plains	108	96
6.	Long Plains	68	62
7.	Windsor	170	133
8.	Barabba	117	135
9.	Fischer	62	78
10.	Redbanks	182	185
11.	Lower Light	206	203
	TOTAL	1456	1430
12	Lewiston	3084	3275
	TOTAL with LEWISTON	4540	4705

Whilst limited opportunities for growth exist, the settlements play an important role as part of the social and economic life of Adelaide Plains. Opportunities to augment their futures should be explored.

Economic and Social Facilities

Social Infrastructure and Community Services



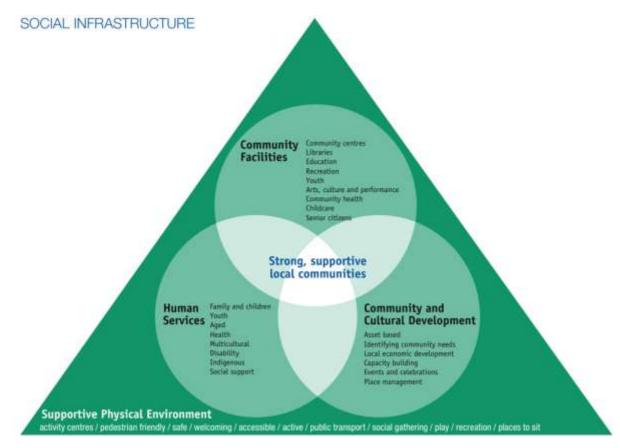
Overview of Existing Social Infrastructure and Community Services

As Adelaide Plains continues to experience urban growth, based on research¹⁷ for the Local Government Association, the following themes are important to contribute to strong and supportive local communities:

- Community diversity
- Sense of community
- Housing choice and affordability
- Access, amenity and lifestyle
- Integration of new and existing communities

Social infrastructure is understood as including community facilities, human services, and community and cultural development.

¹⁷ <u>charlessturt.sa.gov.au/__data/assets/pdf_file/0022/160276/Planning-Social-Infrastructure-and-Community-Services-for-Urban-Growth-Areas-Feburary-2012.pdf</u>



Social Infrastructure Includes Facilities, Services and Community and Cultural Development

Adelaide Plain's townships and settlements level of social infrastructure reflect the agricultural and coastal based communities and their strengths. This is illustrated in the initial application of the townships and settlements to the social infrastructure hierarchy (see table).

Identifying future social infrastructure should have regard to:

- The specific growth context of Adelaide Plains informing a social infrastructure hierarchy
- 2. Understanding existing capacity in social infrastructure, as well as gaps and inefficiencies. Community engagement is essential to inform this.
- 3. Comparative studies to understand what kind of facilities of what size have worked in similar urban growth areas.
- 4. Integrating with other planning underway.
- 5. Funding, delivery, and staging.



The new Xavier College at Two Wells aims to introduce Year 9 in 2023



The new Riverbanks B – 12 School at Angle Vale opened in 2022, immediately to the south east of Lewiston

The draft Regional Public Health Plan identifies the top regional health challenges as:

- Improving mental health and reducing psychological stress (and suicide prevention)
- Access and inclusion (services, transport, digital, disability access)
- Youth engagement and wellbeing
- Supporting an ageing population
- Encouraging healthy lifestyles.

From these challenges, three lighthouse projects are envisaged:



Initial Application of Social Infrastructure Hierarchy to Adelaide Plains

47

¹⁸ Consultation 2022

Hierarchy Level &	Hierarchy Includes	Current APC	Future APC (2041)
Population		9,500 residents	18,000 residents
Neighbourhood 2 - 3000	Small neighbourhood house and similar buildings that provide space for small meetings, gatherings and activities	Dublin, Parham and Thompsons Beach sports and social clubs are examples of neighbourhood level spaces. Lewiston (3,000) playground/dog park is also an example of a gathering space	Towns will continue to serve wider districts. If Two Wells itself is 15,000, are local neighbourhood spaces needed in Liberty & Town Centre? If Mallala itself grows to
5-10,000	Community halls or small community centres, public schools, child care centres or kindergartens and access points for a range of services	Two Wells (2500) and Mallala (733) each have Primary School, Kindergarten, Oval/Clubrooms, Council Library and Office. Two Wells has two child care. Mallala none. Two Wells has Community Centre (Hall). Mallala has Institute (Hall). New School at Two Wells. Museum at Mallala.	around 1600, is a multi- purpose community hub needed? Is something similar needed if rezoning goes ahead at Dublin? If Lewiston grows to 3500, are better developed focal spaces needed? Should a fodder/hardware store with value added local retail be considered?
District 20 - 50,000	District libraries, multipurpose community centres, high schools, community health facilities and facilities and facilities and services for particular groups such as young people, older people or people from diverse cultural backgrounds	Several shooting ranges	If Two Wells grows to 10,000, Is a multi-purpose community hub/health facility with services for particular groups needed? Are a wider range of recreation and sport facilities needed?
Sub Regional 100,000+	Major cultural and civic facilities, major recreation and sporting	Motorsport Park	Motorsport Park What might AIBS and the coastline become as

facilities, tertiary education such as TAFE, health services and higher order entertainment and leisure facilities.	a regional recreation facility? What facilities might the coastal settlements need?
---	---

During 2022 consultation, the Hickinbotham Group affirmed to not formalise a retail-based centre within the Liberty Estate. This position is based on community and council sentiment to retain the primacy of the historic town centre, and based on experience of low prospect of viability of a satellite retail centre within the existing or potential growth areas. Note the Planning and Design Code does not preclude retail development.

Council is to undertake a community infrastructure study over 2023 and 2024. That study needs to be completed to determine whether some form of neighbourhood space should be sought to be established in the northern part of Two Wells. If to be established, such spaces are generally better collocated with open space.

Acknowledging the barrier of the train line/Mallala Road between the 5000 residents to be at Liberty and potential urban development of Hicks land, the Hicks land offers some potential for a local centre, as well as local open spaces for recreation and sport.

Adelaide Plain's townships and settlements existing level of social infrastructure reflect the agricultural and coastal based communities and their strengths.

As growth continues – including planned urban growth - further investigations and engagement are needed to identify particular social infrastructure needs, noting the particular Regional Public Health challenges. This is particularly but not exclusively the case for Two Wells.

Council's role is investigating and engaging about needs, and in some case, direct social infrastructure and services provision (e.g. library, ovals, parks, walking and cycling facilities), and in other cases, facilitating and advocating about needs with others (e.g. transport, public transport, education, aged care).



Popular Recreational and Sport Activities¹⁹

¹⁹ orsr.sa.gov.au/__data/assets/pdf_file/0012/31215/Game-On-Booklet.pdf

Two Wells Recreation and Sport Infrastructure

For Two Wells, the 2016 Open Space Study²⁰ found:

'Potential to expand the existing sports ground to a higher level sportsground to support activities and events for the surrounding region (including the growth area of Buckland Park and Lewiston community).

There will be a need for additional recreation open space to cater for the local needs of the growth area. Additional sporting open space could also be required.

There is good community capacity for participation in activities.

There will also be a requirement for additional sporting open space linked to the existing sportsground to cater for the sports needs of the additional population.'

Given that Lewiston does not have sporting facilities, the potential requirements in Two Wells should also aim to cater for Lewiston. The Two Wells future population plus the Lewiston population in the future could be around 14,000 people. Based on this figure and using the PLA benchmarks, there would be justification for three sports areas or one large sports area and one smaller sports area with the provision of:

- 3 Australian rules ovals
- 2 cricket pitches
- 3 soccer pitches
- 1 x 8 tennis court tennis facility
- 4 netball courts'

Specific Recommendations for Two Wells Oval were:

- Consolidate courts and concentrate activities nearer to clubrooms and oval.
- Review and improve traffic conflicts, circulation and car parking (formalise vehicle circulation, better connect parking).
- Provide additional opportunities for sport competitions and training (e.g. soccer, softball or hockey if there is demand).
- Increase play provision and locate closer to oval and clubrooms.
- Manage and limit pedestrian/vehicle conflicts (match days).
- Increase training areas.
- Remove and redevelop BMX (demand for skate park).
- Explore parking opportunities for RV and campervans (showers, toilet and dump point charge for services).
- Relocate and improve public toilets.
- Increased landscape planting to oval to provide amenity and shelter (wind break).
- Modify community centre to support new sport and recreation functions.
- Improve lighting to oval and surrounding facilities.
- Manage or restrict dog walking on the oval (faeces).

²⁰ <u>apc.sa.gov.au/__data/assets/pdf_file/0030/356493/D16-15679-FINAL-Open-Space-Plan-Background-Report-September-2016.pdf</u>

- Maintain emergency services access (safe area or muster point).
- Address drainage issues across the site.

A Development Deed was agreed between Hickinbotham Developments and the then District Council of Mallala in 2012. The Deed involved the land that is the Eden and Liberty residential areas.

The Deed envisages the provision of

- One playing field that can be used for Australian Rules Football in the winter season and cricket in the summer season. To be provided at or before occupation of 1500 dwellings
- One soccer pitch. To be provided at or before occupation of 2100 dwellings
- Two courts that can each be used for tennis in the summer season and netball in the winter season. To be provided at or before occupation of 1500 dwellings
- Seven playgrounds being provided, one each at the occupation of 500, 1000, 1500, 2000, 2500, 3000, 3500 dwellings

Eden with 265 lots is nearing completion of all 265 lots in 2022. Liberty Tranche 1 involves 364 lots. If 125 dwellings/annum are assumed as being completed in Liberty, 1500 could be reached around 2030.

Need as per	ort and Recreation Infrastruct Provision	Comment	
2016 Study	FTOVISION	Comment	
3 Australian rules ovals	Two Wells Oval (winter)	Overflow at Two Wells Primary or other facility	
	Xavier Oval (winter) (via Deed when 1500 dwellings occupied)	Pending 1500 dwellings Eden 265 Liberty Tranche 1 - 364 total Liberty Tranche 2 - 787 total proposed Liberty Tranche 3 - tbd TOTAL 1400	
	Third Oval (needed)	 To west of Two Wells Oval? In Hicks? Formally share Primary School? 	
2 cricket pitches	Two Wells Oval (summer)	Overflow at Two Wells Primary or other facility	
	Xavier Oval (summer) (via Deed when 1500 dwellings occupied)	Pending 1500 dwellings Eden 265 Liberty Tranche 1 - 364 total	

		 Liberty Tranche 2 - 787 total proposed Liberty Tranche 3 - tbd TOTAL 1400 proposed or constructed
3 soccer pitches	Xavier Soccer (via Deed when 2100 dwellings occupied)	Under construction 2021 south of Xavier
1 x 8 tennis court facility	Two Wells Oval has six tennis/four netball Courts	Potential to expand to be the eight tennis court facility pending investigation of demand
	Two Courts are envisaged at Liberty, each able to be used for tennis and netball. (via Deed when 1500 dwellings occupied)	
4 netball courts	Two Wells Oval has six tennis/four netball Courts	
	Two Courts are envisaged at Liberty, each able to be used for tennis and netball. (via Deed when 1500 dwellings occupied)	Should there be other local courts?

The Deed obligates Hickinbotham and now Xavier to consult with Council with respect to the design and construction and arrangements for the shared use (including nature and extent of availability for community use) of 'School Recreation Infrastructure' comprising oval, soccer pitch and two tennis/netball courts.

The 30 Year Plan for Greater Adelaide outlines criteria for what constitutes a healthy neighbourhood. These include:

• Open space within 5 minute/400m walk

Residents with a larger neighbourhood parks within 1600m engage in 150 minutes more recreational walking per week than those with smaller parks²¹.

53

²¹ <u>healthyactivebydesign.com.au/design-features/public-open-spaces</u>



Small spaces can be designed for multiple sports

Note that indoor recreation centres with 3+ courts typically need a population of 50,000 to support²².

Upgrading recreation and sport facilities, including play spaces, open spaces and trails, should use universal and child safety environs design principles. Water and energy saving initiatives including water harvesting, installation of new or upgrades to existing irrigation infrastructure, connection to existing water infrastructure should form part of upgrading recreation precincts.

The following guidelines are available from ORSR

- Recreation and Sport Facility Design²³
- Recreation and Sport Facility Management Guide²⁴
- How to Plan for a Community Recreation and Sport Hub²⁵
- How to Establish Regional Planning Groups Guide²⁶
- How to Develop a Regional Recreation and Sport Plan²⁷

More work needs to be done around recreation and sport associated with planned growth, in particular growth at Two Wells and Mallala.

²² Pg 35 in <u>lga.sa.gov.au/_data/assets/pdf_file/0026/469421/Murraylands-and-Riverland-Regional-Sport-and-Recreation-Facilities-Needs-Analysis-Phase-1-Report-171213.pdf</u>

²³ PowerPoint Presentation (orsr.sa.gov.au)

²⁴ PowerPoint Presentation (orsr.sa.gov.au)

²⁵ PowerPoint Presentation (orsr.sa.gov.au)

²⁶ PowerPoint Presentation (orsr.sa.gov.au)

²⁷ PowerPoint Presentation (orsr.sa.gov.au)

Tourism Infrastructure

The signature tourist attractors to Adelaide Plains include the Adelaide International Bird Sanctuary Winaityinaityi Pangkara, Mallala Motor Sport Park, and the Mallala Museum.

Along with these, as an established agricultural area, places valued by residents are also enjoyed by visitors. For example, the Two Wells Bakery, recreating in parks and reserves – be it walking, cycling or horse based - experiencing older buildings, and visiting cemeteries.

Existing camp grounds and camping facilities include the Mallala Camp Ground, Parham Camp Ground and Middle Beach Caravan Park. Submissions to the 2022 consultation suggested considering opportunities for recreation vehicle parks as part of the Two Wells main street and oval precinct, and Two Wells to be a RV friendly town.

In 2019 South Australia visitation²⁸ to caravan parks grew by 19% and night's growth was 31% to surpass 1.3M trips and 5.5M nights, both the highest since records of visitation have been kept. This shows a strong trend in demand for caravan and camping sites in SA.

Key themes in Council's Tourism and Economic Development Strategy are:

- Coast
- Main Streets and Townships
- Primary Industries and Food
- Business Support and Growth.
- Population, Infrastructure and Employment.



The Adelaide International Bird Sanctuary, Mallala Motorsport Park, and Mallala Museum are key attractors for visitors to Adelaide Plains

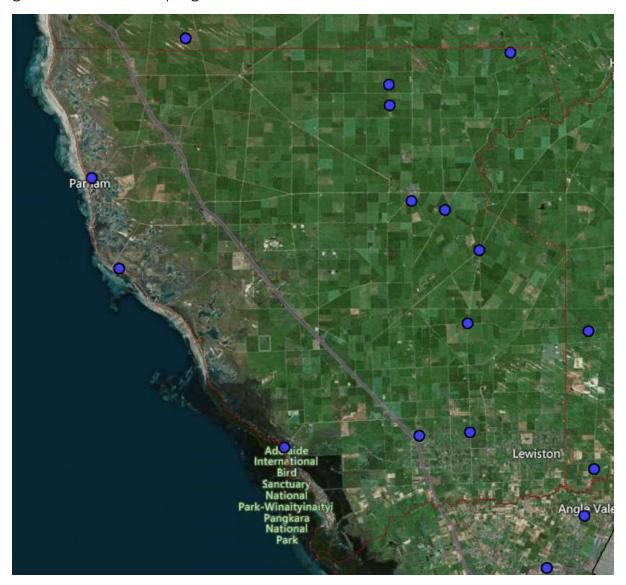
Compared to other regions, Adelaide Plains is less well known for tourism experience. Opportunities to augment visitor experiences should be considered.

²⁸ <u>caravanindustry.com.au/caravanning-and-camping-most-popular-holiday-type-for-australians-in-2019-with-60-million-holiday-nights</u>

Telecommunication Black Spots

Telecommunication services are provided by the private sector operating within Australian Government guidelines.

The Mobile Black Spot Program²⁹ identified gaps with community input until 2018 at which time it closed for nominations. Local communities and councils are encouraged to engage with the mobile network operators and infrastructure providers, as well as state governments, to explore opportunities to improve coverage through Federal and state government initiatives. Experience has shown that when local communities and councils engage with the mobile providers it increases the likelihood of an application being put forward under government funded programs.



Black Spots Identified in 2018

56

²⁹ <u>infrastructure.gov.au/media-technology-communications/phone/mobile-services-coverage/mobile-black-spot-program/faq</u>

The Peri-Urban Mobile Program (PUMP)³⁰ is a grants program that provides funding to improve mobile connectivity in bushfire priority areas along the edges of Australia's major cities. The program targets long standing mobile coverage and reception issues in the peri-urban fringes of Australia's major cities.



Lewiston, Two Wells and part of Port Wakefield Highway are eligible for funding to improve mobile connectivity under the Per-Urban Mobile Program. A planning application has been lodged for a mobile tower in Lewiston.

With community input, Council can engage with authorities where needed to improve mobile coverage.

³⁰ <u>infrastructure.gov.au/media-technology-communications/phone/mobile-services-coverage/peri-urban-mobile-program</u>

Utilities Infrastructure

Water, sewer, electricity, gas, and communications infrastructure are important for residents and business to plan their future. Solar renewables are establishing, noting Adelaide Plains is part of the SA wide electricity network.

New development, be it housing or business, is responsible for funding connections to utilities infrastructure. However, some infrastructure needs augmenting, and this can be a barrier to growth.

As a rapidly growing local government area, provision of infrastructure is an ongoing challenge. Timing of infrastructure provision, funding and what infrastructure is the responsibility of council, state government or private sector needing to be addressed.

RDA Barossa have priorities³¹ around water systems, energy for industry, high value agriculture, and an international standard equine centre.

The proposed Adelaide Plains/Light Regional Council subsidiary aims to advocating and assist securing infrastructure enhancements. This is for infrastructure that is the direct responsibility of councils as well as that of other agencies.

Sewer for the new housing estates at Two Wells is the responsibility of the private sector. Council operates CWMS at Mallala and Middle Beach. Council is investigating a CWMS for the original township at Two Wells.



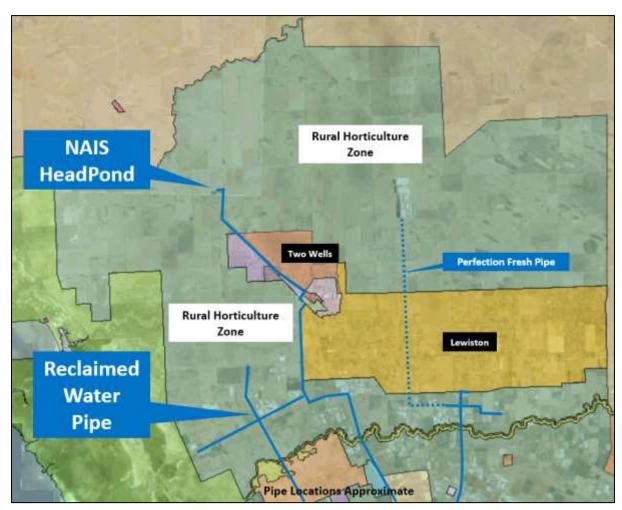
Examples of Utilities Infrastructure provided by Agencies

Ongoing work involving infrastructure providers, government and private sector is needed to ensure sufficient utilities for growth.

³¹ barossa.org.au/priorities/

Northern Adelaide Food Bowl and Irrigation Scheme

The Northern Adelaide Irrigation Scheme (NAIS) provides recycled water to irrigate crops, particularly horticulture. The project jointly funded by the South Australian and Australian Governments³² ³³involved new water treatment facilities at Bolivar.



The Rural Horticulture Zone has a total area of 17,600 hectares

Delivered by SA Water, NAIS was intended to unlock 12GL of water to be used in agricultural food production. The goal is to support development of over 300 hectares of high-technology horticulture, and a further 2,700 hectares of advanced agri-food production.

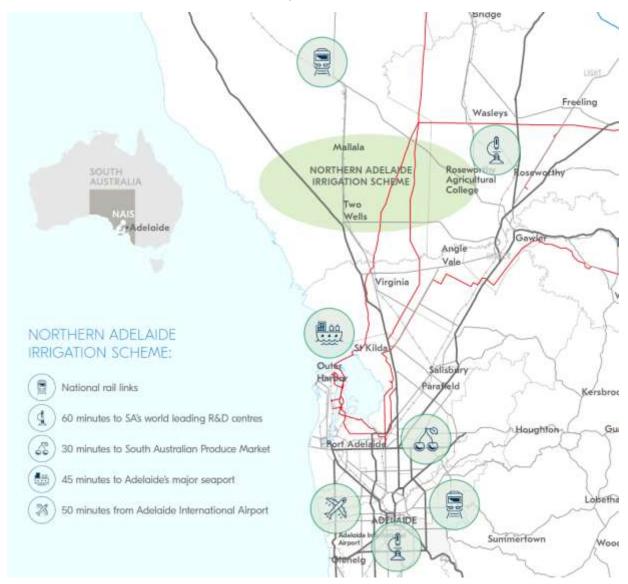
Capital contribution, availability charges and consumption charges all form part of potential users of NAIS accessing the water. sawater.com.au/nais/invest-in-nais

Current arrangements entail extremely low rates of take up of NAIS. The horticulture industry cite barriers of high capital contribution/connection costs, infrastructure augmentation requirements, access to NAIS infrastructure and the high cost and quality of water.

³² Australian Government \$45.6M and SA Government \$110M. SA Water NAIS Call for Project Proposals 2018

³³ nationalwatergrid.gov.au/program

This results in economic development, particularly horticulture, not being stimulated. The Rural Horticulture Zone is a total area of 17,600 hectares.



Success of the Northern Adelaide Irrigation Scheme is fundamental to the liveable growth of Adelaide Plains³⁴

The Northern Adelaide Irrigation Scheme: Market Proving Study³⁵ was undertaken by Arris for Council in 2015. The Allied Food Industries Land Supply Study³⁶ of 2017 recognised that high quality, fit for purpose recycled water offered through NAIS will likely lead to a diversification of primary industry activities occurring across southern and central regions and a shift in the manner in which farms operate and the land area required to accommodate new enterprises.

³⁴ Image from SA Water NAIS Call For Project Proposals 2018

³⁵ Microsoft Word - Market Proving Study draft .docx (apc.sa.gov.au)

³⁶ apc.sa.gov.au/_data/assets/pdf_file/0017/355211/Allied-Food-Industries-Land-Supply-Study.pdf

The study flagged that new entrants that may look to establish:

- Intensive horticulture high value field and enclosed environments (both covered and high-tech)
- Tree crops (i.e. nuts, olives)
- Intensive animal keeping (e.g. feedlots, intensive poultry and pork)
- Viticulture:
- Organic produce
- Speciality crops (e.g. medical cannabis or hemp for fibre).

Direct allied food industries may include:

- Washing/processing/packing of produce (e.g. packing shed)
- Winery
- Bulk commodity storage
- Feed/hay processing mill

Ancillary food industries may include:

- Chemical resellers
- Cold storage
- Transport and logistics
- Equipment sales and service
- Nurseries
- Value-adding industries (e.g. food manufacturers)

AlS head-ponds and pipes were installed in Adelaide Plains around 2018 – 2020. This occurred concurrent with an update regarding the Horticulture Zone in the then Development Plan (now Planning and Design Code).

Council decision of 28 February 2022 'that the Chief Executive Officer brings back a report detailing the benefits or otherwise to Adelaide Plains Council and its ratepayers in reducing the size of the Horticultural Land tenure sizes within areas of Adelaide Plains Council and details the process involved and position of Department of Planning to support same."

The Northern Adelaide Plains Food Cluster³⁷ is an industry-led organisation driving the strategic direction for the Northern Adelaide Plains with a focus on increasing profitability and sustainability for local businesses.

NAIS is intended to foster establishment of a diverse range of horticulture based and allied development south of Light River and centred around Two Wells. This will significantly intensify land use activity, economic development and employment.

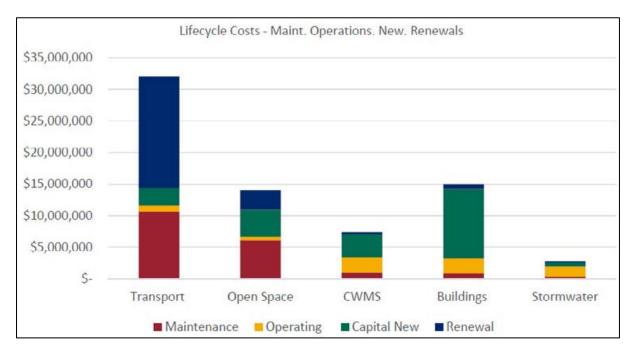
The uneconomic pricing of water as a barrier entails APC continuing advocacy with SA Water.

³⁷ northernadelaideplains.com.au/about-the-cluster

Council Assets

Council is responsible for assets with a total asset replacement cost of approximately \$140M. These comprise:

- Transport roads, footpaths, kerb & channel, traffic control devices, bridges
- Stormwater
- Community Wastewater Management Systems (CWMS) at Mallala and Middle Beach
- Buildings
- Open Space shelters, play equipment, seating etc



Operational and maintenance costs for the next 10 years are forecast³⁸ at around \$2.7M/annum. Capital outlay which includes renewals and new/upgrades are forecast at around \$4.5M/annum.

Council operates prudentially with respect to recurring revenue it receives, notably annual rate. It does this through annual review of the 10 year asset plan, annual business planning and careful operational delivery. Actively seeking funding and partnerships enables, for example, capital enhancements to be delivered through grants or by developers through contributions.

Population growth and increasing demand and use of CWMS assets will affect their useful life and will increase Council's maintenance and renewal program. A review needs to be undertaken to determine capacity to accommodate future demand from zoned residential land, including in existing townships where such land is not connected to CWMS. Growth from unzoned land will depend on timing and scale of rezoning.

³⁸ Numbers are summarised from the draft Asset Strategic Plan accessed mid-2021. Refer to the document for detail.

Council has limited funding capacity to increase capital works consequent on urban growth. Be it CWMS, sport and recreation, footpaths, roads, community spaces or offices.

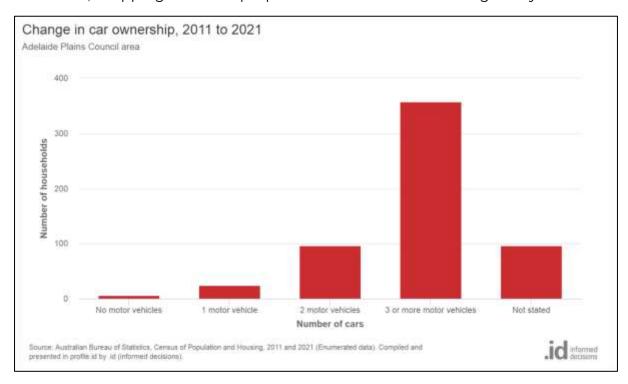
Council will work with State and Australian Governments, and community, business and development partners to realise necessary social and economic infrastructure.

Transport

Car/Bus/Community Transport

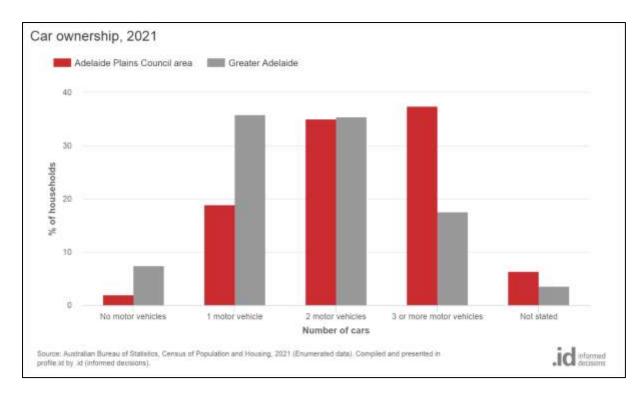
Being a functioning agricultural district with growing urban development, car ownership is high Options³⁹ include a Council monthly bus to Gawler/Elizabeth, the Mid North Community Passenger network, and coach services. Major towns are not serviced by public transport.

Analysis of car ownership in 2016 indicates 70% of households had access to two or more motor vehicles, compared to 50% in Greater Adelaide. This signifies a reliance on private transport for existing residents to access work, services, education, shopping or leisure purposes within the district or regionally.

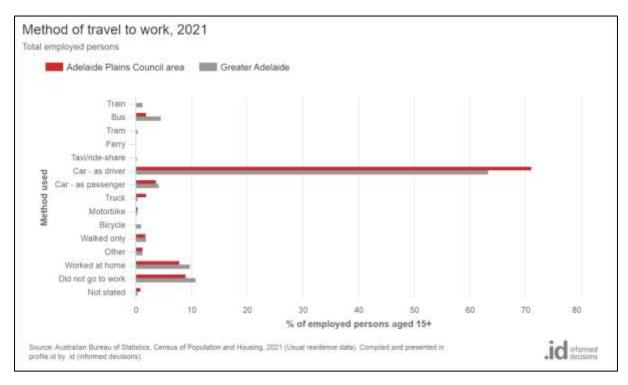


Across Adelaide Plains, parallel with household growth has been growth in 2 and 3 vehicle households

³⁹ apc.sa.gov.au/council-services/community/transport



Compared to Greater Adelaide, Adelaide Plains has a higher proportion of households with 3 or more vehicles



In 2021⁴⁰, 75% of people travelled to work in a private car, 2% took public transport and 1.9% rode a bike or walked. 7.9% worked at home, a higher rate than Greater Adelaide and possibly arising from many farms and horticultural businesses also being where residents live. These statistics signify a reliance on private transport

65

⁴⁰ apc.sa.gov.au/our-council/community-profile

for existing residents to access work, services, education, shopping or leisure purposes within the district or regionally.

Advocating for improved public transport, and exploring regional community passenger network and community bus is a Lighthouse Project in the Regional Public Health Plan.



Road and Rail Network

Transport is based on a road network that caters for private vehicles, trucks, cyclists, pedestrians and buses. The train line provides national freight and passenger services, and provides for some local freight in Mallala. The line is managed by the Australian Rail Track Corporation.

The Council area currently has 181 km of sealed and 541 km of sheeted roads, with the remainder being unsealed.

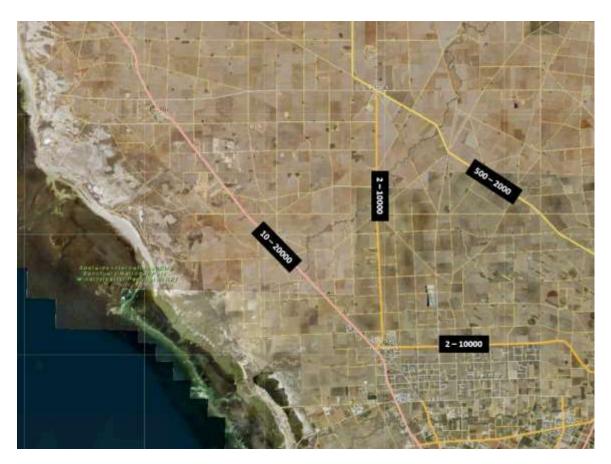


Image – State maintained roads carry between 500 and 20,000 vehicles per day Electric Vehicles

Electric vehicles, including trucks and bikes, are emerging at commercially available rates, underpinning take up. The State Government is incentivising EV charging stations⁴¹ across South Australia. Whilst electric cars and ebikes are readily available, etrucks are now emerging, benefitting business. Electric vehicles primary benefit is reduced carbon output and lower traffic noise.



Image – etrucks are emerging lowering carbon and traffic noise

⁴¹ treasury.sa.gov.au/Growing-South-Australia/incentives-for-electric-vehicles

Walking/Cycling/Equine

As the towns grow, planning for walking/cycling networks is important to enable wellbeing benefits as well as options for greater numbers of residents to move locally and to nearby work. Ebikes make nearby work in agricultural areas accessible in shorter time. Research⁴² affirms the wellbeing and economic benefits of exercising more than 150 minutes/week. Equine movement is principally recreationally within Lewiston but with further planning, expanded trails could exist. Planning for these modes also enables recreation and tourism outcomes

Population and agribusiness growth means a significant increase in stress on the road network, especially given the lack of public transport and distances involved for work, services, education, shopping, leisure and freight.

Growth will increase some services in towns, in particular Two Wells, recognising that online services/shopping – particularly post COVID – has grown.

Growth will necessitate spending on roads accompanied by lobbying for the introduction of public transport services and augmented community transport. The business cases of traffic bypasses will need investigation, particularly at Two Wells noting residential growth of the town proper.

Increasing walking, cycling and equine infrastructure presents options for residents for better wellbeing and with ebikes, readier access to nearby agribusiness work or leisure.

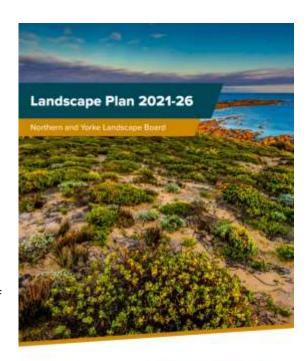
⁴² orsr.sa.gov.au/_data/assets/pdf_file/0009/430569/ACTIVE-LIVES-HIGHLIGHTS.pdf

Environment

Natural Resource Management

Natural resources management is about striking a balance between preserving our natural environment and allowing natural assets to be used to generate income or to be used by the community for enjoyment and recreation.

Adelaide Plains Council is located within the Northern and Yorke Landscape Board region which extends for 38,500 square kilometres and encompasses the Yorke Peninsula, significant areas of Spencer Gulf and Gulf St Vincent, the southern Flinders Ranges, parts of the Rangelands, the Mid North, the northern Mount Lofty Ranges, the Barossa and northern Adelaide Plains





The Landscape Board recognises that many individuals and organisations share an interest in sustainable management of the region's landscapes and that managing our landscapes is about working together to ensure that the needs of the community, industries and the environment are balanced in a way that is sustainable.

With this balance in mind, the Board's vision⁴³ for region's landscapes is that they are 'a healthy, living landscape meeting the social, environmental, economic and cultural needs of the community, and ensuring the rights and wellbeing of future generations'.

As growth continues in the Council area, impacts on natural resources and landscapes will be a key consideration for all stakeholders. This includes existing landscapes, native vegetation, and additional greening.

^{43 &}lt;u>landscape.sa.gov.au/ny/about-us/our-regions-plan</u>

Fire and Flood Hazards

Fire and flood hazards, be it from Gawler and Light Rivers, or the coast, have influenced the development of Adelaide Plains in the past.

Arising from the Emergency Management Act 2004, the framework for hazards is around risk reduction, incident operations and recovery.

Planning for growth involves considering reducing the risk from hazards as growth occurs.



Based on investigations involving emergency services, the statutory planning system establishes policy to enable development provided sited and designed with regard to hazard risk.

A new Planning and Design Code was introduced in 2021.

Planning and Land Use Services (SA Government) are undertaking investigations and Amendments to the Planning and Design Code with respect to the hazard of fire and flood risk associated with Gawler and Light Rivers. These are SA wide investigations.

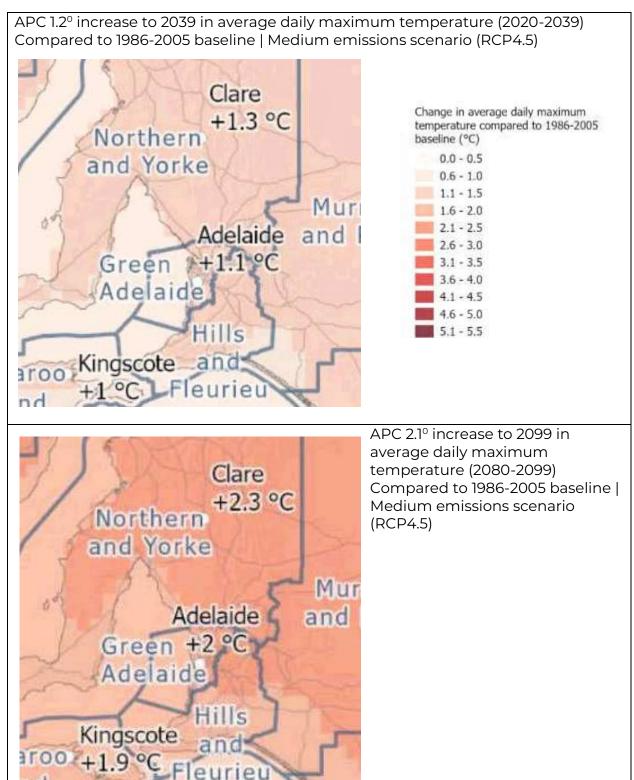
Ongoing investigations are underway with respect to managing flood risk by the Gawler River Flood Management Authority. With grant funding, at Two Wells, Council is installing a levee to the east and south of town to reduce the hazard impact associated with Gawler River.

Regarding coastal inundation, past studies are informing contemporary Community Emergency Management Plans for each settlement. Past studies identify particular hazards at Middle Beach.

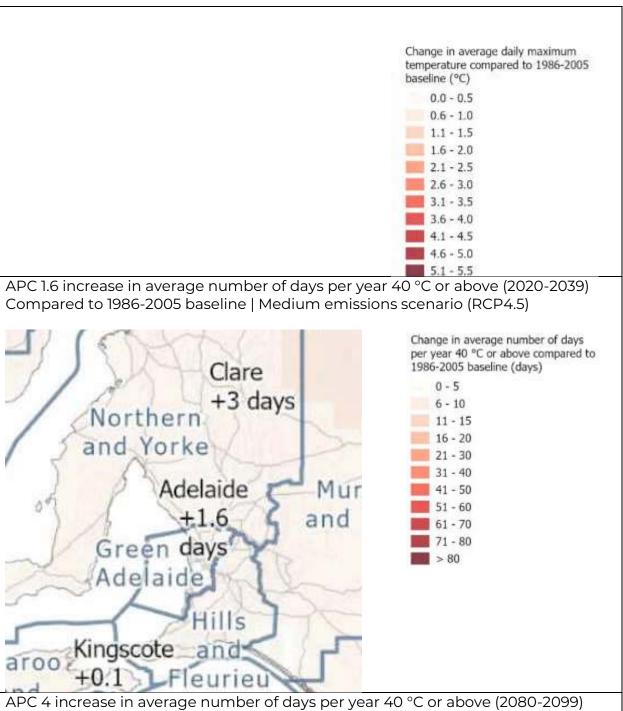
Better planning for flood and fire hazards improves investment potential as providing clarity about the rules by which development can and cannot occur.

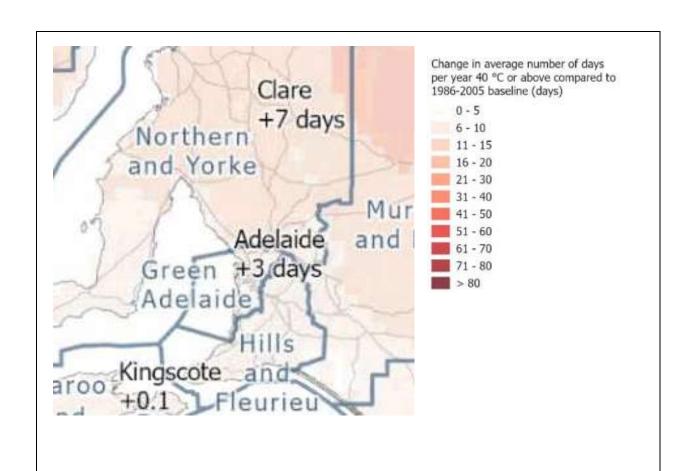
Climate Forecasts to 2100

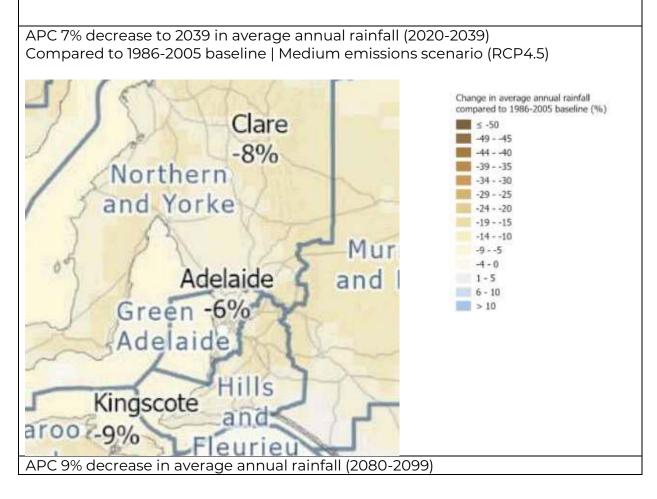
Department of Environment and Water 2022⁴⁴ analysis project increasing average temperatures, more days over 40 degrees, and lessening rainfall.

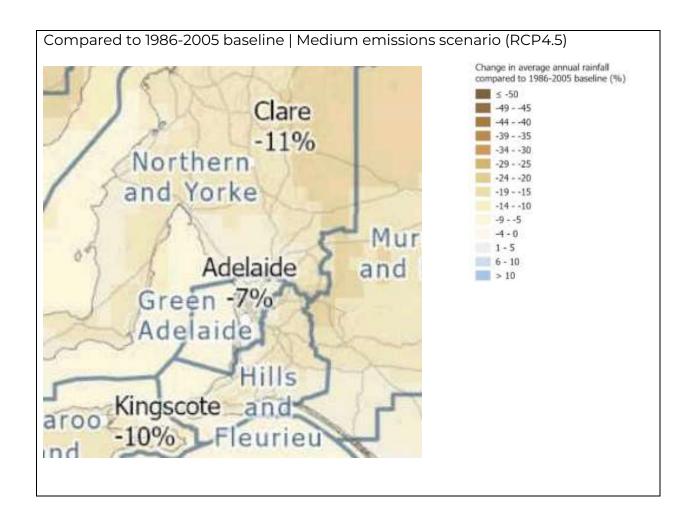


⁴⁴ <u>environment.sa.gov.au/topics/climate-change/climate-science-knowledge-</u>resources/latest-climate-projections-for-sa









Heritage

Adelaide Plains forms part of Kaurna Country. European settlement commenced as part of the European settlement of South Australia from 1836. Two Wells, Mallala, and Dublin are established towns, with coastal settlements at Parham, Webb Beach, Thompsons Beach, and Middle Beach. Extensive rural living and animal husbandry is at Lewiston. Other settlements include Windsor, Lower Light, Redbanks, Fischer, Barabba, Port Gawler, and Wild Horse Plains.

Identifying and conserving places of heritage value bring benefits economically, socially and environmentally.

A Heritage Australia 2010 study⁴⁵ concluded:

- Although some participants in the market may tend to shy away from heritage listed property, they wrongly perceive that such properties have inherent economic and restrictive problems, whereas there is a distinct and lucrative value added market that can be accessed.
- That conservation can and does create employment. There are costs associated with conservation but these are more than offset by the economic, social and psychological benefits. Precinct and area

⁴⁵ Heritage Australia: A review of Australian Material regarding the economic and social benefits of heritage property' - P Wills and C Eves for the NSW Heritage Office, March 2010

- conservation helps people maintain their socio-cultural identity which would more than likely be lost through large scale demolition and redevelopment.
- Conservation does sometimes appear in the short term to come at a cost, but the long term benefits to the owner of the property and the community as a whole outweigh this cost. When carried out properly the heritage listing of a stand-alone or isolated properties can benefit the owner as well as those in the immediate vicinity

A 2005 report⁴⁶ by the Allen Consulting Group assessed several Australian studies which collectively demonstrated that property values are either neutrally or positively impacted by a heritage listing.

A national survey undertaken in the 2005 report revealed that 93% of the community see heritage as forming part of Australia's identity and that heritage places are important to protect. The survey also found that 80% strongly agreed or agreed that the historic houses in my area are an important part of the area's character and identity.

In 1983, a Heritage Survey of the Lower North included the District Council of Mallala⁴⁷. From that, 11 places are formally recognised as being of State Heritage value.

There are no local heritage listed places in Adelaide Plains. Legislation enabling local heritage listing was introduced in 1991. A heritage review commenced in 2021, with consultants undertaking assessments regarding statutory criteria.

There are no items of National, Commonwealth or World Heritage in Adelaide Plains.

Identifying and conserving Adelaide Plains heritage is important for the social and economic value represented. Recent work progressing heritage recognition should be completed. In time, further studies undertaken.

75

⁴⁶ Valuing the priceless: The value of Historic Heritage in Australia (research report 2), Allen Consulting Group for the Heritage Chairs and Officials of Australia and New Zealand, 2005 ⁴⁷ environment.sa.gov.au/topics/heritage/sa-heritage-register/heritage-surveys

Projected Urban Growth Rate 2021 - 2041

South Australia is a small economy impacted by global economic trends. SA has historically had low growth per annum. Noting ongoing Commonwealth interest to foster and balance growth across Australia, it is not expected SA's rate of growth on a national basis will differ markedly from the past.

One of COVID's impacts is to reduce Australia's long term population growth⁴⁸.

Pre COVID, Australia was expected to have 33.3M in 2041. Post COVID, Australia is expected to have 31.5M in 2041. In 2041, there be 111,000 fewer South Australians. idconsulting state 'If you're planning over a 15-year+ horizon, the story is simple: fewer dwellings are forecast to be built in all regions, but most significantly in the inner city and growth areas'.

This projection about Adelaide Plains – including as a growth areas - is on the basis of South Australia continuing to experience low steady economic growth.

Two Wells/Lewiston is part of Adelaide's North Region⁴⁹. The North Region is the fastest growing region in SA, with significant industrial and horticultural areas. The area has extensive options for development including Two Wells, Riverlea, Roseworthy, Angle Vale and Playford. The age structure for this region reflects a large 'young' and 'older' working-age cohort with a substantial 0-14 age cohort.

3.3 Adelaide - North Region (sA4) Including Elizabeth, Sallsbury, Modbury, Enfield, Mawson Lakes, Gawler, Virginia, Two Wells and Roseworthy

Region Summary

The Adelaide - North region consists of Salisbury, Playford, Tea Tree Gully and Gawler councils, the eastern portion of Port Adelaide Enfield council, and small parts of the Adelaide Plains, Light and Barossa councils adjacent to Playford and Gawler.

The area has significant industrial precincts and also substantial horticulture areas. It is the fastest growing region in the state and at the 2016 census, the population was 429.924.

Gawler is the largest town with a population of 26,472.

This region has extensive options for future development particularly around Playford, Buckland Park, Gawler, Two Wells, Angle Vale and Roseworthy.



⁴⁸ Demographic Delays – How Closed Borders will Impact the Future Demand for Services, idinformeddecisions, May 2021

⁴⁹ Population Projections for South Australia and Regionals, 2016 – 41 Government of South Australia

Two Wells/Lewiston are part of the Adelaide North Region

Growth in Adelaide Plains will be impacted by nearby urban growth, such as in Playford and Light. Major estates like Roseworthy and Riverlea will accommodate their share of growth, and will impact the rate of completion of major estates as well as minor infill in Adelaide Plains.

Similarly, the rate by which employment in the northern food bowl grows will impact the rate of growth.

That said, the comparatively high rate in 2020 and 2021 appears consequent on various factors coinciding:

- Release of serviced land in Liberty
- Completion of infrastructure (including the Catholic secondary)
- Opening of the northern connector
- Commonwealth Covid related stimulus allowed for new housing
- Upgrades of community infrastructure, such as Two Wells main street and the Town Square
- The increased capability to work from home

Two Wells is an established community and township which prospective home builders immediately experience rather than waiting for these to be established. It is recognised that current retail offerings and social services will not adequately provide for the volume of forecast residential population.

One risk is that the COVID stimulus has brought forward demand that may in a few years see a slowing of the rate. Council's role to plan and upgrade infrastructure as well as deliver a range of services to enable liveable communities will continue to be critical to underpin investment confidence, be it a homebuilder or business.

Potential growth rates based around annual population increases over the next 20 years are outlined below:

Population (Council Area)	2021	2041	Average % increase/PA
Average Increase / Annum			
250		14441	2%
300		15441	2.25%
350	9655 ABS	16441	2.5%
400		17441	2.75%
450		18441	3%
2013 Two Wells DPA 'up to 9700 more residents' over 20 to 30 years		18200	3.8%

If planned residential growth occurs as forecast, Two Wells will grow from around 2555 in 2016 to around 10,500 in 2041. Two Wells goes from being the 41st to around the 12th largest town in South Australia.

	ells – from SA's 41st t	2016	2041
1.	Adelaide	1.165M	
•••	racialac	1.1001	(Mt Barker Council
			56,000)
*			(Riverlea is aimed fo
			30,000, maybe later
			than 2041)
2.	Gawler	26,472	
3.	Mt Gambier	26,148	Ť
4.	Whyalla	21,501	1
5.	Murray Bridge	16,804	+
6.	Mt Barker Council	17,365	
7.	Victor Harbour	15,265	8
8.	Crafers-	15,125	8
<u> </u>	Bridgewater	10,120	
9.	Pt Pirie	15,343	- F
10.	Pt Lincoln	14,088	
11.	Pt Augusta	12,896	
11.	renagasta	12,030	Two Wells 10,500
12.	Goolwa	7,717	1000 00013 10,500
13.	Nuriootpa	1,717	-
14.		10.00	-
15.	Naracoorte		8
16.	Nairne	*	*
17.	Millicent	200	
18.	Renmark	18.25	×
19.	Kadina	15 C	
20.			-
21.	Moonta		
22.	Berri		+
	Wallaroo	b)	
	Loxton	-	
25.			ė.
26.		3 6	ž.
27.	TO THE RESERVE TO THE		8
	Angle Vale		
	Bordertown	1	
	Kapunda		
31.		1	*
32.			
33.	CACTO PERON AND A SALVA CAPITAL ARTHUR	100	15
_	Ceduna		-
	Willunga		9
	Lobethal		
37.	Freeling	1	

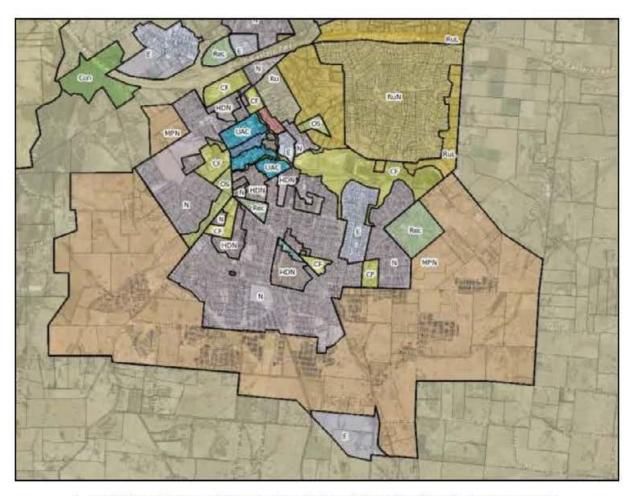
38.	Angaston	2044	
39.	Barmera	1935	
40.	Crystal Brook	1935	
41.	Two Wells	1926	
42.	Normanville	1906	

Comparing Two Wells and Mt Barker

The town of Mount Barker has and continues to experience significant urban growth. Rezoning enabling growth at Two Wells and Mt Barker townships occurred after 2011.

Comparing both based on ABS and population forecasts indicates the significant scale and rate of growth that may be impacting Two Wells in coming years as well as giving some context to that potential growth.

2011 - 2036	Mt Barker / Wistow 50	Two Wells 51
Population Growth	21,928 4.26%PA	6,500 5.55%PA
2036	33,883	8,800
2021	18,401	2,743
2016	14,025	2,510
2011	11,955	2,280



Land Zoned around Mt Barker is Enabling Further Urban Growth

⁵⁰ Based on Mt Barker and Wistow, and Mt Barker Growth Area profile.id.com.au/mount-

⁵¹ profile.id.com.au/adelaide-plains and staff analysis of envisaged land division at Two Wells

Options for Future Planned Urban Growth

Council is aware of the ongoing challenge of planning for urban growth along with agricultural based business. Opening up land for new development will increase supply and impact the market as well as place more demand on services and infrastructure.

This is a consideration around what the need for land is, which land to rezone, and the timing of rezoning and land release. Other factors in planning for growth and whether to rezone further land include already available zoned and serviced land, value of land for primary production, flood risk, and the benefit to each town economically, socially and environmentally.

Regarding Two Wells and Dublin, in 2019 Council provided in-principle support to the Hicks Group Ltd and Leinad Land Developments (Dublin) Pty Ltd to advocate for boundary change to the Environment and Food Production Area (EFPA). There has been no change to the EFPA that would allow the rezoning of further residential land to date.

Mallala has zoned land yet to be developed. Likewise, there are land parcels in Rural Living Zones as yet to be developed, and the Deferred Urban land is a consideration.

A clear vision is needed to guide future planned urban growth.

Vision needs to be informed by investigations relevant to the context of each township that has regard to economic, social and environmental considerations.

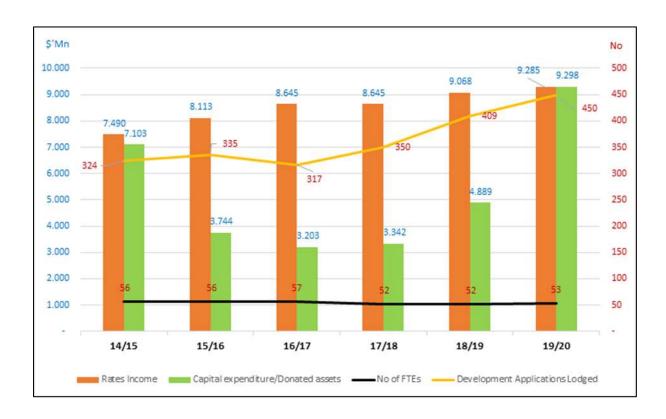
This includes future potential urban growth at Two Wells and Dublin noting Council's support for progressing two rezoning objectives. Recognising growth planned at Two Wells and Mallala, Dublin's service role in the north west and proximity to substantial areas of the Bird Sanctuary and coast, considering Dublin's future is timely.

Local Government Impacts

Councils are faced with the need to balance service levels within financial constraints while meeting the expectations of the community. Councils must discharge their legal obligations as determined by several Acts of Parliament relative to the role of Local Government. Consequently responsible financial management and in particular, appropriate rates levels are necessary to provide the financial resources to meet those expectations and obligations. This is increasingly difficult in a growth environment when budgets are challenged by multiple needs, emerging community expectations and significant expenditure mandated by various legislative obligations.

It is widely acknowledged that Local Government is under significant pressure to provide ongoing and improved levels of service delivery while taking on additional responsibilities which were the traditional role of State and Federal Governments.

As a consequence Council is beginning to experience an awareness of the difficulty in meeting ongoing community expectations for service within existing organisation structures and financial constraints. The ability to maintain quality service delivery while at the same time manage expanded service role expectations and facility demand is an important challenge to address.



Rapid urban growth will place infrastructure, community services and assets under increasing pressure. Urban growth will place all areas of Councils services under increased strain and demand for services and infrastructure upgrades,

outside mandate infrastructure maintenance, will increase exponentially in coming years.

To address this pressure, Council needs a coordinated approach to managing and facilitating growth and the provision of necessary infrastructure and services that leads to liveable and economic towns and districts.

Attachment A - 30 YEAR PLAN FOR GREATER ADELAIDE

Adelaide Plain's is part of Greater Adelaide and the targets and policies of the 30 Year Plan for Greater Adelaide⁵² are to guide how growth of Adelaide Plains is to occur into the future.

This also means the State Planning Commission (custodians of the 30 Year Plan), and other entities such as Infrastructure SA, and all State Government agencies and departments, are interested in how Adelaide Plains is to grow...

The following tables sections analyse targets and policies for relevance to Adelaide Plains.

Targets

Targets		APC Relevance
Containing our urban footprint and protecting our resources	90% of all new housing in Outer Greater Adelaide will be built in established townships and designated urban development areas	Urban growth to be planned for
More ways to get around	60% of all new housing in metropolitan Adelaide (includes Two Wells and Lewiston) will be built within close proximity to current and proposed fixed line (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045	Public transport to be advocated about and planned for.
Getting active	Increase the share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide by 30% by 2045	Active transport to be fostered

83

⁵² livingadelaide.sa.gov.au/

Walkable neighbourhoods	Increase the percentage of residents living in walkable neighbourhoods in Outer Metropolitan* Adelaide by 25% by 2045	u e
A green liveable city	Urban green cover is increased by 20% in metropolitan Adelaide by 2045	Greening to be fostered
Greater housing choice	Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045	Increased housing options to be planned for

Policies – Transit Corridors, Growth Areas and Activity Centres

Policies	APC Relevance
P9 Develop activity centres as vibrant places by focusing on mixed-use activity, main streets and public realm improvements.	Centres to be reinforced
P10 Allow for low-impact employment activities in residential areas, such as small-scale shops, offices and restaurants, where interface issues can be appropriately managed.	Provided for in SA Planning system and Planning and Design Code
P11 Ensure new urban fringe growth occurs only within designated urban areas and township boundaries and outside the Environment and Food Production Areas, as shown on Map 3.	Plan for growth
P12 Ensure, where possible, that new growth areas on the metropolitan Adelaide fringe and in townships are connected to, and make efficient use of, existing infrastructure, thereby discouraging "leapfrog" urban development.	Growth is to reinforce townships

Policies - Design Quality

Policies	APC Relevance
P25. Encourage urban renewal projects that take an all-inclusive approach to development by including streetscapes, public realm, public art and infrastructure that supports the community and responds to climate change.	Need to plan for integrated growth
P26. Develop and promote a distinctive and innovative range of building typologies for residential housing which responds to metropolitan Adelaide's changing housing needs, reflects its character and climate, and provides a diversity of price points.	Provided for in SA Planning system and Planning and Design Code
P27. Provide for transitions between higher density and multi-storey, mixed-use developments in activity centres, corridors and existing detached housing precincts.	Provided for in SA Planning system and Planning and Design Code
P28. Promote permeable, safe, attractive, accessible and connected movement networks (streets, paths, trails and greenways) in new growth areas and infill redevelopment areas that incorporate green infrastructure.	Include as part of intended walking and cycling plans

P29. Encourage development that positively contributes to the public realm by ensuring compatibility with its surrounding context and provides active interfaces with streets and public open spaces.	Provided for in SA Planning system and Planning and Design Code
P30. Support the characteristics and identities of different neighbourhoods, suburbs and precincts by ensuring development considers context, location and place.	Provided for in SA Planning system and Planning and Design Code

Policies – Heritage

Policies	APC Relevance
P33. Recognise the value that communities place on heritage and ensure that new development is implemented sensitively and respectfully.	Provided for in SA Planning system and Planning and Design Code
P34. Ensure heritage places and areas of heritage value are appropriately identified and their conservation promoted.	Work underway. More work needed
P35. Encourage the innovative and sustainable reuse of heritage places and older building stock in a way that encourages activity and entices people to visit.	Provided for in SA Planning system and Planning and Design Code

Policies - Housing Mix, Affordability and Competitiveness

Policies	APC Relevance
P36. Increase housing supply near jobs, services and public transport to improve affordability and provide opportunities for people to reduce their transport costs.	Foster employment in proximity to housing
P37. Facilitate a diverse range of housing types and tenures (including affordable housing) through increased policy flexibility in residential and mixeduse areas, including: · ancillary dwellings such as granny flats, laneway and mews housing · dependent accommodation such as nursing homes · assisted living accommodation · aged-specific accommodation such as retirement villages · small lot housing types · in-fill housing and renewal opportunities.	Need to monitor housing choice provision. Part provided for in SA Planning system and Planning and Design Code

P39. Promote universal and adaptable housing principles in new housing stock to support changing needs over a lifetime, including the needs of those who are less mobile.	Need to monitor universal design in housing. Part provided for in SA Planning system and Planning and Design Code
P40. Use government-owned land and large underdeveloped or vacant sites as catalysts for stimulating higher density development and innovative building forms.	Relevant at Two Wells
P42. Provide for the integration of affordable housing with other housing to help build social capital.	Provided for in SA Planning system and Planning and Design Code
P43. Increase the supply of affordable housing through the provision of 15 per cent affordable housing in all new significant developments. These developments include surplus and residential government land projects; declared major developments and projects; and rezoned land that increases dwelling yield (including all new growth areas).	Need to monitor. Part provided for in SA Planning system and Planning and Design Code Provided for in SA Planning system and Planning and Design Code
P44. Enable and encourage the provision of affordable housing through linking incentives, including the benefits of re-zoning such as planning policy bonuses or concessions to new affordable housing supply.	Consider in rezoning
P45. Promote affordable housing in well located areas close to public transport and which offers a housing mix (type and tenure) and quality built form that is well integrated into the community.	Consider in rezoning
P46. Ensure an adequate land supply is available to accommodate housing and employment growth over the longer term (at least a 15 year supply).	Need to monitor supply

Policies - Health, Wellbeing and Inclusion

Policies	APC Relevance
	Relevant for all
The second secon	townships and
include:	settlements, including
 diverse housing options that support affordability 	future growth

· access to local shops, community services and	
facilities	
P48. Create greenways in transit corridors, along major watercourse linear parks, the coast and other strategic locations to provide walking and cycling linkages.	Consider in trails strategy and walking cycling plans
P49. Encourage more trees (including productive trees) and water sensitive urban landscaping in the private and public realm, reinforcing neighbourhood character and creating cooler, shady and walkable neighbourhoods and access to nature.	Fostering greening and canopy needed
P50. Provide diverse areas of quality public open space in neighbourhoods (especially in higher density areas) such as local parks, community gardens, playgrounds, greenways and sporting facilities to encourage active lifestyles and support access to nature within our urban environment.	Monitor. Build on 2016 open space studies. Need a planned approach to open space, building on 2016 studies
P51. Facilitate and support the value of local ownership by supporting communities and businesses to help shape and look after their local open spaces and streetscapes.	Foster via engaging on plans and in there delivery. Part of council operations
P52. Support a diverse range of cultural initiatives, such as public art, to stimulate the revitalisation of communities and social cohesion.	Need to foster.
P53. Encourage the integration of green infrastructure in the public and private realms to support positive physical, mental and social health outcomes.	Fostering greening and canopy needed
P54. Prioritise Planning and Development Fund grants for improved access to quality public realm (such as playgrounds, linear paths and new open space purchases) at strategic locations.	Consider in actions.

Policies – The economy and jobs

Policies	APC Relevance
P55. Promote certainty to undertake development while at the same time providing scope for innovation.	Panning for growth fosters certainty
P56. Ensure there are suitable land supplies for the retail, commercial and industrial sectors.	Need to monitor land supply
Primary Production	APC Relevance
P57. Maintain and protect primary production and tourism assets in the Environment and Food Production Areas, while allowing for appropriate value-adding activities to increase investment opportunities (Refer to Map 5).	Need to monitor
P58. Ensure that the Environment and Food Production Areas, Character Preservation Districts and planning policies work in an integrated way to: • protect key primary production assets and opportunities • facilitate local operating and investment conditions that support primary production and related agri-business development • enable timely business adjustment and climate change adaptation by primary producers.	Need to monitor. Council made a submission to the EFPA review in 2021
P59. Enable major new primary production and agri-business development across the Northern Adelaide and Barossa regions and in the Mount Barker-Murray Bridge corridor and prevent ad hoc land use changes that may compromise those investments.	Need to monitor.
P60. Ensure land use planning in and around the Virginia horticulture district aligns with projects for industry growth and revitalisation anticipated by the Northern Economic Plan.	Context
P62. Manage the interface between townships and adjacent primary production activities and areas of nature protection.	Provided for in SA Planning system and Planning and Design Code.
Tourism	APC Relevance
P63. Provide for sustainable tourism development across Greater Adelaide by: · protecting, enhancing and promoting the qualities that attract tourism and are of value to the whole community	Council's TED seeks to foster

providing appropriate support infrastructure for tourism facilitating sustainably designed tourism accommodation in suitable locations facilitating tourism-related developments such as restaurants, specialty retail accommodation and other value adding activities.	
Mining and resources	APC Relevance
P64. Protect existing mineral resource operations by: • preserving adequate separation distances between mining activities, housing and other incompatible development • ensuring buffers are contained within mine sites wherever possible • mitigating potential interface issues • maintaining access to freight networks.	Limited mining in APC Provided for in SA
P65. Identify and protect the high pressure gas pipelines and other key infrastructure services.	Planning system and Planning and Design Code.
Manufacturing Defence	How GSAP aligns
P68. Focus business clusters and manufacturing hubs around key transport infrastructure such as road, air, rail, sea terminals and intermodal facilities to maximise the economic benefits of export infrastructure.	Important to continue to foster employment consolidation near towns
Green Industries	How GSAP aligns
P70. Ensure planning controls for employment lands are flexible to allow new green technologies and industries to emerge and grow.	Provided for in SA Planning system and Planning and Design Code.
P71. Encourage the establishment and expansion of medium and large scale renewable energy generation within the region.	
P72. Encourage the development of large scale habitat restoration and conservation projects to increase environmental and primary production values and add to local economies and employment opportunities.	Need to foster
Employment Land	APC Relevance
P73. Provide sufficient strategic employment land options with direct access to major freight routes to support activities that require separation from	Foster employment plans near freight routes

Policies - Transport

Policies	APC Relevance
P74. Ensure development does not adversely impact the transport function of freight and/or major traffic routes and maintains access to markets (Refer to Map 7).	Provided for in SA Planning system and Planning and Design Code.
P75. Increase the number of neighbourhoods, main streets and activity centres where place is given greater priority than vehicle movement by adopting a 'link and place' approach.	Action included in walking cycling plans
P76. Improve the amenity and safety of public transport stops, stations and interchanges by improving their connections to adjacent development and encouraging mixed-use development and housing diversity in close proximity.	Action included in walking cycling plans
P77. Ensure that new housing (and other sensitive land uses) permitted in locations adjacent to airports and under flight paths or near major transport routes (road, rail and tram) mitigates the impact of noise and air emissions.	Provided for in SA Planning system and Planning and Design Code.
P78. Improve, prioritise and extend walking and cycling infrastructure by providing safe, universally accessible and convenient connections to activity centres, open space and public transport (see Map 8).	Walking cycling plans and trail networks planned
P79. Encourage car share schemes and public electric car charge points in transit corridors, activity centres and higher density neighbourhoods through incentives.	Action included for Two Wells
P80. Reduce car parking requirements in mixed-use areas near high frequency public transit services to encourage the use of alternative transport modes.	Provided for in SA Planning system and Planning and Design Code.
P81. Protect current and future road and rail for strategic requirements, such as ensuring adequate access to ports and other major facilities (see Map 7).	Provided for in SA Planning system and Planning and Design Code.

Policies	APC Relevance
P82. Coordinate and link strategic infrastructure across Greater Adelaide to ensure it meets the needs of a growing population with a changing demographic profile and supports a more productive economy.	Important to integrate land use and infrastructure planning
P83. Define and protect strategic infrastructure sites and corridors from inappropriate development to ensure the continued functionality of the services they provide.	Provided for in SA Planning system and Planning and Design Code.
P84. Protect major economic infrastructure such as airports, ports and intermodals from encroachment by incompatible development and facilitate further economic activity in these locations (See Map 7).	Provided for in SA Planning system and Planning and Design Code.
P85. Provide for adequate buffer zones around water and waste treatment plants and identify complementary activities that generate economic or community benefits that can occur in these areas (See Map 9).	Provided for in SA Planning system and Planning and Design Code.
P86. Ensure that new urban infill and fringe and township development are aligned with the provision of appropriate community and green infrastructure, including: · walking and cycling paths and facilities · local stormwater and flood management including water sensitive urban design · public open space · sports facilities · street trees · community facilities, such as child care centres, schools, community hubs and libraries.	Important to plan as part of growth
P87. Encourage early provision of community infrastructure in fringe and township growth areas to assist in creating a sense of belonging and building community wellbeing.	Important to plan the timely provision of needed infrastructure
P88. Design and locate community infrastructure to ensure safe, inclusive and convenient access for communities and individuals of all demographic groups and levels of ability.	Actions included around the need and spatial location. Detailed design needs more work.
P89. Integrate and co-locate different community infrastructure and services in community hubs to maximise their use and enhance their economic feasibility.	Need a planned approach to social infrastructure in growth areas

Policies - Biodoiversity

Policies	APC Relevance
P90. Delineate and maintain areas with significant environmental values to protect landscape health; conserve biodiversity; and improve development certainty and transparency (represented in Map 10). This includes: Nature Protection Areas: These are largely undeveloped areas that retain significant environmental values recognised through existing legislation. This includes protected public lands (such as conservation and marine parks), private protected lands (such as Heritage Agreements), and areas of native vegetation and listed wetlands. These areas should be protected from development unless specific exemptions apply. Complementary Developed Landscapes:	APC Relevance Consider 30YP areas in more detail. Conservation areas provided for in SA Planning system and Planning and Design Code.
These are substantially modified farming landscapes where existing land uses and significant environmental values, different from those in Nature Protection Areas, co-exist in a way that provides mutual benefits. The generally open and undeveloped nature of these landscapes should be maintained through appropriate zoning to support continuation of the primary production systems that create environmental niches for target species.	
P91. Protect coastal features and biodiversity including: · habitats that are highly sensitive to the direct impacts of development · important geological and/or natural features of scientific, educational or cultural importance · landscapes of very high scenic quality.	Provided for in SA Planning system and Planning and Design Code.

Policies - Open Space, Sport and Recreation

Policies
P98. Provide for a Greater Adelaide open space framework that builds on the Metropolitan Open Space System (MOSS) to create quality open space across the region. The open space will feature urban forests and parks, watercourse and coastal linear parks, trails, greenways, shared use paths and green

buffers, and sustainable recreation and sporting facilities (See Map 11).	
P99. Ensure quality open space is within walking distance of all neighbourhoods to: · link, integrate and protect biodiversity assets and natural habitats · provide linkages to encourage walking and cycling to local activities, local activity centres and regional centres · be multi-functional, multiuse (including the shared use of strategically located school facilities) and able to accommodate changing use over time · incorporate the principles of Crime Prevention Through Environmental Design for safety and amenity · contain appropriate and low maintenance species and locate trees to maximise shade · encourage unstructured recreation opportunities such as the provision of a variety of paths and children's play equipment · foster a connection to the natural environment through the provision of nature play spaces and urban forest opportunities.	Build on 2016 Open Space studies
P100. Ensure that the Planning and Development Fund is strategically aligned to public realm and open space projects which support the implementation of Greater Adelaide's new urban form.	Part of implementing
P102. Strategically locate sports and recreational facilities to cater for community needs.	Build on 2016 Open Space studies
P103. Ensure that public open space is adequately greened and irrigated (where appropriate) to act as a natural cooling system to reduce heat island effects in urban areas.	Foster greening and canopy

Policies – Climate Change

Policies	APC Relevance
P105. Deliver a more compact urban form to: · protect valuable primary production land · reinforce the Hills Face Zone, character preservation districts and Environment and Food Production Areas · conserve areas of nature protection areas · safeguard the Mount Lofty Ranges Watershed	Plan growth to conserve agricultural and conservation land.

· reduce vehicle travel and associated greenhouse gas emissions.	
P106. Protect key coastal areas where critical infrastructure is at risk from sea level rise, coastal erosion and storm surges, and ensure new coastal development incorporates appropriate adaptation measures.	Continue hazard planning
P107. Increase the proportion of low-rise, medium-density apartments and attached dwellings to support carbon-efficient living.	Foster increased housing options
P108. Promote green infrastructure (including green roofs, vertical gardens and water sensitive design) in higher density and mixed-use developments to assist with urban cooling, reduce building energy use and improve biodiversity.	Foster greening and canopy
P109. Support a zero waste culture by reducing the waste footprint of new development.	Foster waste reduction in development, including related to Council waste operations
P111. Create a more liveable urban environment through establishing a network of greenways, bicycle boulevards, tree-lined streets and open spaces, which will have a cooling effect on nearby neighbourhoods and buildings.	Foster greening and canopy in townships open spaces and walk/cycle ways
P112. Provide the opportunity for neighbourhood- level alternative energy supplies, which may include embedded and distributed renewable energy, co- generation and smart grid/green grid technology.	Provided for in SA Planning system and Planning and Design Code.
P113. Promote energy efficiency, the use of renewable energy sources and neighbourhood level alternative energy supplies and storage in new developments to reduce energy costs and carbon footprint.	Needs more work. Part provided for in SA Planning system and Planning and Design Code.
P114. Encourage the provision of electric vehicle charging points in new higher-density developments, large public and private car parks, activity centres and employment lands.	Potential with Two Wells growth

Policies – Water

Policies	APC Relevance
P115. Incorporate water-sensitive urban design in	Provided for in SA
new developments to manage water quality, water	Planning system and
quantity and water use efficiency and to support	Planning and Design
public stormwater systems.	Code.

Policies – Emergency Management and Hazard Avoidance

Policies	APC Relevance
P118. Minimise risk to people, property and the environment from exposure to hazards (including bushfire, terrestrial and coastal flooding, erosion, dune drift and acid sulphate soils) by designing and planning for development in accordance with a risk hierarchy of: · avoidance · adaptation · protection.	Continue hazard planning
P119. Improve the integration of disaster risk reduction and hazard avoidance policies and land use planning.	Continue hazard planning associated with fire, flood and coast.
P121. Ensure risk posed by known or potential contamination of sites is adequately managed to enable appropriate development and safe use of land.	Provided for in SA Planning system and Planning and Design Code.
P122. Mitigate the impact of extreme heat events by designing development to create cooler communities through the use of green infrastructure.	Foster greening and canopy

SUBMISSION – PLANNING SYSTEM IMPLEMENTATION REVIEW



January 2023

Contents

OVERVIEW	2
REVIEW BACKGROUND	2
ABOUT PLANNING FOR ADELAIDE PLAIJNS	3
PLANNING DEVELOPMENT AND INFRASTRUCTURE ACT	3
Infrastructure Schemes	3
Environment and Food Production Area	7
Deemed Planning Consent	8
Deemed Approval/Minor Variations	8
Assessment Timeframes	8
PLANNING AND DESIGN CODE	9
Trees	9
Animal Husbandry Sub Zone – Local Policy	10
Large Sheds in Master Planned Township Zone	11
Conflict Between Agricultural Land Uses / Buffer Zones	12
EPLANNING AND PLANSA	13
Development Assessment Portal	13
Verification	13
Appendix A Council 2021 Submission to EFPA Review	14
Scope of Review	15
About the EFPA	16
Observations	18
EFPA Generally Aligns with Strategic Goals of Adelaide Plains	18
EFPA Not Allowing Housing with Horse Keeping or Dog Kennelling Needs Review	20
EFPA Rules Not being reflected in the Planning and Design Code is Discordant and Needs Immediate Change	22
EFPA Rural Living Settlement Employment Needs Review	23
Two Wells Planned Urban Growth Challenges and Opportunities	37
Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land	42
Appendix B Local Government Assessment Manager Forum November Submission	
Appendix C Council Submission on Phase 3 Draft Code December 2020	53

OVERVIEW

This submission is provided to the Planning System Implementation Review.

Acknowledging the wide scope of the Review, this submission focusses on particular matters of relevance to Adelaide Plains. This submission draws on:

- Submissions by Council about the EFPA in 2021 and the draft Planning and Design Code in 2020
- A submission by the Local Government Assessment Manager Forum to the Expert Panel.
- A shared view by officers from growth councils in Greater Adelaide on planning for infrastructure.

REVIEW BACKGROUND

During the March 2022 State Election, an election commitment was made to commission an independent review of the *Planning, Development and Infrastructure Act 2016* and the Planning and Design Code to ensure planning decisions encourage a more liveable, competitive and sustainable long-term growth strategy for Greater Adelaide and the regions.

The Minister for Planning, Hon. Nick Champion MP, has commissioned an independent panel of planning experts to conduct a review of reforms to the planning system implementation, including the:

- Planning, Development and Infrastructure Act 2016
- Planning and Design Code and related instruments, as it relates to infill policy, trees, character, heritage and car parking
- ePlanning system, to ensure it is delivering an efficient and user-friendly process and platform
- PlanSA website, to check usability and ease of community access to information.

We note discussion papers with questions were released on 17 October 2022.

Submissions are invited to DTI.PlanningReview@sa.gov.au

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

ABOUT PLANNING FOR ADELAIDE PLAIJNS

Council has been and is undertaking various projects to inform the future of the Council area. This is in the context of Council's Strategic Plan 2021 to 2024 as well as Council's Tourism and Economic Development Strategy¹.

Various projects underway include:

- draft Growth Strategy and Background Paper. This completed consultation in October 2022
- draft Equine Strategy and Background Paper. This completed consultation in November 2022
- updating Council's coastal adaptation strategy over 2023
- Dublin Growth and Tourism Master Planning to commence in 2023
- Council Wide social and community infrastructure planning, and updated open space planning. To commence in 2023
- draft Two Wells Walking Cycling Plan. To be consulted on in 2023
- Heritage Amendment to the Planning and Design Code.

Updating policy for hazards associated with riverine flood, in particular Gawler and Light Rivers, and fire, acknowledging the impacts of the Pinery fire are continuing. These are of key relevance for Adelaide Plains.

PLANNING DEVELOPMENT AND INFRASTRUCTURE ACT

Infrastructure Schemes

Planners from growth Councils of Greater Adelaide have collaborated on preparing a response to the Expert Panel regarding the need to establish workable infrastructure schemes for large and complex land developments.

The collaborating councils include Adelaide Plains, Gawler, Light Regional, Onkaparinga, Playford, Salisbury, Mount Barker and Barossa. Each Council will be forwarding an individual response.

The councils agree with the expert panel that as provided in the *Planning, Development and Infrastructure Act 2016* (the Act) the General and Basic infrastructure scheme are overly complex and difficult to work with, if operatable at all.

Two quotes from the Expert Panel Discussion Paper are illuminating:

"The provisions regarding general infrastructure schemes have **not yet** commenced and before they have commenced, the Commission must conduct an inquiry into the schemes in relation to the provision of essential infrastructure under Part 13 of the PDI Act, and a report on the outcome of the inquiry must be laid before both Houses of Parliament (pg. 31)".

This is a very concerning delay in the provision of essential infrastructure, which in turn would be a drag on project implementation and overall economic development, despite the Act being in place since 2016.

¹ apc.sa.gov.au/our-council/council-documents/councilplans accessed 18 October 2022

The Discussion Paper also highlights the complexity of managing these infrastructure projects:

"The legislative provisions surrounding infrastructure schemes under the PDI Act are **far more detailed and complex** than the legislative provisions in most other jurisdictions (pg. 33)".

Councils have responded to this legislative and policy gap with local developer contributions schemes using Deeds and Infrastructure Agreements anchored to affected properties by Land Management Agreement/s. In some cases, separate rates are levied on properties once developments reach a trigger.

Adelaide Plain's infrastructure experience can be characterised as the misalignment of infrastructure planning by State level entities with planning for land use growth.

Two Wells grew at 4.8% per annum from 2016 to 2021. Two Wells comprises 80% of population growth in Adelaide Plains. A rate of 4.8% population growth is a similar rate to that of Mt Barker and far higher than Greater Adelaide.

Population growth at high rates needs matching planning and delivery of infrastructure.

Council acknowledges its own infrastructure role and has aligned its 10-year financial plan and asset plans to support population growth that is liveable and sustainable. This includes Council's role in community facilities, open space, greening, transport and base council services).

Infrastructure agencies are generally well set up to work with land and property developers with individual development proposals.

Infrastructure agencies are however less well set up to deal with councils who present different issues when undertaking planning for growth and subsequent Code amendments.

There is a not insignificant gap in operational practice of agencies. A few examples:

- The intent of the 2018 Northern Food Bowl Protection Areas Development Plan Amendment rezoning a significant portion of Adelaide Plains for development of horticulture and agribusiness development was supported by SA Water. However, for land owners with land now rezoned, the cost of water infrastructure works is cost prohibitive. To date, the outcome has been markedly slow take up of land for horticulture and agribusiness, notwithstanding ongoing discussions involving SA Water, Council and the Northern Adelaide Plains Food Cluster.
- The intent of the 2013 Two Wells Residential Development Plan Amendment is growth of Two Wells to around 10,000 residents in the long term. Much of this population growth is occurring. However, transport infrastructure agreed prior to the rezoning via Deeds with the Department of Infrastructure and Transport (DIT) has not been delivered in the time expected. This is notwithstanding ongoing discussions involving DIT, Council, Hickinbotham as the major land developer, Catholic Education SA with a school with from zero to 600 students in three years, and the Minister for Transport.

Along with misalignment of infrastructure planning by entities with growth, Adelaide Plains continues to experience lack of usable tools within the planning legislation to seek infrastructure upgrades associated with a proposed development that are some distance from the development site.

Council's planning officer's legal ability to get council infrastructure upgraded as part of a land division (or even a major land use development) continues to present practical challenges.

- For many years, planning legislation has not allowed Councils to seek augmentation and headworks costs beyond the boundaries of the site of the proposed development.
- This has been confirmed over the years by letters from Planning Ministers. Council planners are legally unable to condition off-site road/drainage/CWMS upgrade costs that are needed to service and support the proposed new lots or development.
- Past views have included that Council should refuse the development in these circumstances. If Council officers are generally supportive of the proposed development provided the roads/drainage/CWMS are improved, this view is less than helpful.
- As a work around, many councils negotiate with developers parallel 'infrastructure agreements'
 that set out infrastructure works to be undertaken external to the site, including costings and
 staging. The development application is on hold pending completion of this separate process.
- The ongoing lack of a tool in the planning legislation is at odds with Planning and Design Code
 Policy as well as former Development Plan policy seeking proper infrastructure servicing of
 proposed developments.
- The infrastructure provisions in the PDI Act are convoluted and complex and not fit for purpose to be entered into for off-site needed infrastructure augmentation. The PDI Act scheme is not mandatory and has no incentive or trigger to get involved.
- State agencies, in particular SA Water and SA Power Networks, have always asked for their augmentation costs as a condition of land division consent (and their requirements are vague as to the costings) whereas any condition of like effect put on by a council would be called ultra vires by the Courts and the validity questioned on the lack of specificity
- It is not a level playing field and councils have had to approach this the hard way, without clear statutory support and reliant on developers coming to the party rather than face a refusal

Alternative solutions to Land Management Agreements and Deeds are required to enable the development of the State's strategic growth areas like Adelaide Plains. The solution needs to work for these areas because they require co-ordinated infrastructure delivery and rezoning where not all landowners are in agreeance and where the infrastructure provision may have a long horizon and several providers.

The combined councils strongly believe based on our combined experiences there must be a **whole of government** approach, requiring all relevant parties to come together to discuss and ultimately agree to revised schemes for infrastructure requirements, its delivery and funding. The Councils agree with the State Government's position that infrastructure delivery must be resolved prior to the commencement of a related Code Amendment. There would be a benefit in ensuring that for certain larger-scale undertakings, detailed Structure Planning precedes related infrastructure negotiations and Code Amendments.

Given the need to expedite development in SA, a simpler system can be developed to ensure that there is a common understanding of required infrastructure contributions at the outset of each project requiring same. The combined councils contend that a 'case by case' approach as currently utilised is delaying infrastructure projects from housing to employment lands and hence holding up both orderly and economic development.

Infrastructure Schemes should be clear and straightforward in what they need to achieve based on the following principles - **strategic**, **equitable**, **sustainable** and **best practice**, **adaptive**, and **economical**

Within the Discussion Paper – Planning, Development and Infrastructure Act 2016 Reform Options, we note the Jurisdictional Comparison. The combined councils consider there is substantial merit in further exploring alternative legislative provisions noting there is support within the combined councils for a similar approach taken by the Victorian Planning Authority. It is noted that the State of Victoria has been operating a Developer Contributions Scheme since 2003.

The combined councils have been asked to respond to the following questions on Infrastructure Schemes posed by the Expert Panel:

- 1. What do you see as barriers in establishing an infrastructure scheme under the PDI Act?
- Acknowledging that one of the schemes is not operational, the schemes are overly complex with numerous decision-making points by different owners.
- Councils are concerned that most of the decision making, and control comes from the State Government when Local Government has the knowledge, links to the community and current and future ownership of most of the infrastructure.
- The schemes provide no guidance on where the upfront investments will come from.
- The schemes provide no usable planning tool for off development site infrastructure augmentation.
- Separately, the schemes place considerable responsibility on the 'Scheme Coordinator' role, making this the subject of potential governance risk in conducting negotiations with more than one landowner/ developer.
- The Scheme Coordinator approach may lack the ability to involve key stakeholders, e.g. government agencies and/ or key utilities to ensure timely deliverables.
- 2. What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?
- It is considered the issues identified in question 1 plus the recommendations in questions 3 should be considered.
- Infrastructure definitions be reviewed to incorporate open space and recreational facilities
- The Act should be amended to ensure Structure Planning of growth areas with infrastructure designs and costings occurs prior to the rezoning process.
- The Act needs to require that the State Government provides for an effective whole of government infrastructure co-ordination that aligns with Regional Plans, including funding mechanisms for infrastructure agencies. It is difficult for councils to engage with infrastructure providers (e.g. SA Water, SAPN/Electranet and the Department for Education) at the strategic planning and rezoning stages. Agencies need to be committed to providing services to facilitate and support development opportunities.
- 3. Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?

A 'Whole of Government' approach (including Transport, Education, Health and Wellbeing, Emergency Services, Environment, Recreation and Sport, Local Government etc.) via an empowered authority would appear to be an effective alternative model to consider exploring.

For instance, the Victorian system has been identified as having a better coordinated infrastructure model and provides an example of measures that could be adapted to SA such as:

• Predetermined contribution costs for various types of infrastructure, with the ability to alter the agreed cost when identified in a structure plan.

- A State infrastructure fund to pay for infrastructure prior to development proceeding and costs being recouped.
- A minimum requirement that 10% of land is allocated towards key infrastructure at the structure planning stage.

Anecdotal feedback suggests the Victorian model benefits all stakeholders (including landowners, developers, communities, local authorities, State Departments/agencies, key utilities etc.) by being aware of a contribution-based approach in contemplating rezoning and development opportunities.

The combined councils are interested in exploring such a model with the State Government and other stakeholders, acknowledging the councils would maintain an interest in continuing to manage key local infrastructure decisions and delivery management arrangements.

Any processes need to ensure key triggers for delivery of required outcomes. As development assessment is problematic as a trigger for infrastructure delivery and relying upon the Land Management Agreement/ Infrastructure Deed model can also be problematic. It is considered that creating another legislative device that can be attached to an affected Certificate of Title, similar to a LMA may be worth considering as an addition to the current tools.

Environment and Food Production Area

As you are aware, the Environment and Food Production Area (EFPA) was brought into operation in 2017 under the *Planning, Development and Infrastructure Act 2016*. The Act requires the Commission to review the EFPA every five years. The next five-year Review is due in 2027.

Council made a formal submission to the 2021 EFPA Review (**Appendix A**). The outcome of the 2021 EFPA Review were minor boundary changes.

Two matters in our submission were considered out of the scope of the review by the Commission.

These include the EFPA:

- 1. Not Allowing Housing with Horse Keeping or Dog Kennelling, despite this form of development being appropriate within the EFPA.
- 2. Not being reflected in the Planning and Design Code being Discordant with the EFPA, sending confusing mixed messages to land owners and potential investors and needing immediate change.

The fact that the matters raised in our submission remain not considered is the sign of a planning system needing reform.

The matters raised in our submission continue to influence the orderly development of land in a manner consistent with the EFPA.

We ask that the Review consider the current legislative tools that underpin the EFPA and gaps in their operation. Particularly where EFPA and Planning and Design Code policy are inconsistent.

Ideally, we'd like the two matters in our submission 'addressed and resolved'. If not possible, we seek that the Review consider whether the legislative tools in the PDI Act guiding the operation of the EFPA are fit for a contemporary planning system.

Deemed Planning Consent

The Local Government Assessment Manager Forum submission (**Appendix B**) identified a range of problems with the current arrangements for Deemed Planning Consents.

The submission states 'Assessment managers are of the view the deemed consent approach does not provide a basis for collaborative relationships with applicants that in turn deliver more appropriate planning outcomes'.

The submission identifies only Queensland has deemed consents, with NSW having deemed refusals, and Victoria, WA and Tasmania providing for review by a court on the facts and the court making a considered and independent determination on the application.

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the Deemed Planning Consent approach.

Deemed Approval/Minor Variations

The Local Government Assessment Manager Forum submission (**Appendix B**) identifies a range of problems with the current arrangements for Deemed Approvals/Minor Variations.

The submission states 'There are some examples of accredited professionals interpretation being such that they have effectively undertaken a performance assessed development, including on notifiable development.'

'This issue is exacerbated with the ambiguity that is created with s106(2) of the Act in relation to minor variations. The Deemed to Satisfy (Minor variations) is subject to various interpretations and has created uncertainty and delayed approvals, as identified by the Panel's discussion paper. This varying interpretation has resulted in poor outcomes for applicants. The difficultly with the interpretation was highlighted when a cross sector working group established by PLUS was unable to define what constitutes minor variations.'

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the approach to Deemed Approvals and Minor Variations.

Assessment Timeframes

The Local Government Assessment Manager Forum submission (**Appendix B**) supports the Expert Panel's observation that there should be a review of assessment timeframes.

The submission states 'It is not reasonable to expect an application for 19 plus dwellings or large-scale warehousing to be assessed in 20 days, yet this is currently the case.'

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the Assessment Timeframes.

PLANNING AND DESIGN CODE

Trees

We note the Discussion Paper considers trees not in metropolitan Adelaide as well as Native Vegetation. These involve Adelaide Plains.

The Discussion Paper questions posed are below in italics.

Tree Canopy

- Q 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?
- Q 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?

We support one tree being required on each dwelling site in master planned/greenfield development areas. Increasing risk of heat is a known climate change hazard. Requiring one tree in association with a proposed dwelling works to increase onsite shade and greening and contribute to a cooler, more climate friendly master planned housing estate.

Most householders plant one tree in the rear yard. If a tree is planted in the front yard, from a compliance perspective, it can easily be viewed from the street. Resources for compliance are an ongoing issue for council.

Preference for planting in the front or rear yard depends on orientation of the lot. Shading the house itself is just as important as the rear yard. Council is open to Code 'required' trees being planted in the front or rear yards provided Adelaide Plains Council areas is included in State commissioned aerial photography of tree coverage. Current tree mapping does not cover Adelaide Plains.

We support further expansion of community education about greening into Adelaide Plains.

Native Vegetation

- Q What are the issues being experienced in the interface between the removal of regulated trees and native vegetation?
- Q Are there any other issues connecting native vegetation and planning policy?

Council officers have observed numerous applicants for development formally 'declaring' their proposed development does not impact Native Vegetation and only on limited occasions, applicants voluntarily providing proper information justifying this declaration. This is accepted as Council officers are not in a position to check the validity of an applicant's 'declaration'.

We support the Panel's recognition of the importance of '...the ability for applicants to access information about whether native vegetation is present on their land, and if so, how they can avoid impacting the same.'

Noting a range of native vegetation information and tools are on the Department of Environment and Water website, we propose these should be augmented to enable land owners to easily identify whether there is native vegetation on their land.

Animal Husbandry Sub Zone - Local Policy

Adelaide Plains Animal Husbandry Subzone is the only location within SA that this subzone applies. Prior to the introduction of the Code, the Animal Husbandry Zone was part of the Mallala Development Plan. The Animal Husbandry Sub Zone is a subzone of a Rural Living Zone, with both overlaid by the Environment and Food Production Area.

Council made a formal submission to the 2020 consultation on Stage 3 of the draft Planning and Design Code (Appendix C) around the issue of the Animal Husbandry Sub Zone within the Rural Living Zone.

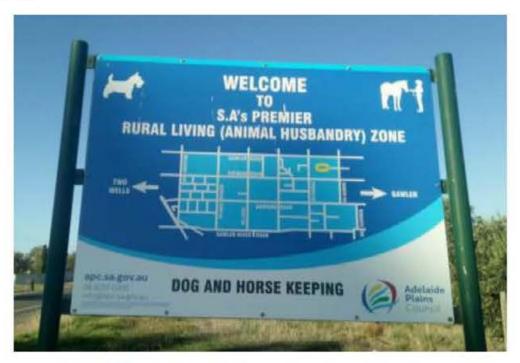


Figure: Adelaide Plains contains SA's Premier Rural Living/Animal Husbandry Zone

For SA's premier Animal Husbandry area, our observations about the Planning and Design Code are as follows:

- Setback patterns envisaged in the Code are not achievable when the majority of rural living lots are 30 m in width e.g. 50m setback Deemed to Satisfy (DTS) for a horse stable;
 35m setback DTS for kennels, stables, shelters, associated yards.
- There is a lack of information justifying the 20-dog basis as a DTS.
- The lack of notification of large-scale horse keeping and dog keeping on large site, at odds with APC's 2020 submission

Comment re 2022 Code	
Large scale horse keeping not notified, at	
odds with Council 2020 submission.	
Dog keeping on sites greater than 1HA not	
notified, at odds with Council submission	
that 'large' dog kennelling be notified.	

Restricted Development - the 1,000sq m floor area threshold exclusion for a 'shop' is far too generous and the 2019 figure of 200m² should be reinserted.

Shops DTS standard 50m² consistent with Council submission

The Local Government Assessment Manager Forum submission (Appendix B) states 'It is recommended the Expert Panel also give consideration to the inclusion of additional local policy in the Code. The announced changes to heritage and character to bring strong controls is welcomed and this initiative should be extended to consider other policy gaps / deficiencies in the Code that have been identified by various stakeholders.'

The Code could readily be amended through Technical and Numeric Variations to call up appropriate local policy for the Animal Husbandry Sub Zone.

The Animal Husbandry Sub Zone is only within Adelaide Plains

The former Development Plan's suitable local policy was removed through creating the Planning and Design Code, notwithstanding submissions by Council.

The Expert Panel is requested to consider a State wide approach to resourcing reinstating Code equivalent local policy – including Adelaide Plain's distinct Animal Husbandry policy - that was removed by introducing the Planning and Design Code.

Code equivalent local policy could be further augmenting technical and numeric variations, and could be Character Statements applying in 'local areas'

Large Sheds in Master Planned Township Zone

A development trend is for large sheds associated with new dwellings in the Master Planned Township Zone. Within Two Wells this include the Liberty and Eden housing estates that will eventually accommodate some 5-6000 residents.

As a peri-urban Council on the edge of Greater Adelaide, Council is receiving numerous applications for large sheds (for example, greater than 90m² and with wall heights above 3.6m) within the Master Planned Township zone and includes the following DTS maximum criteria:

- floor area 60m²
- wall height 3m
- overall height 5m

Where shed applications do not meet the DTS standards, an on balance, case by case assessment using the Performance Outcomes within the Planning and Design Code is undertaken. We note that former Development Plan had larger wall height and area criteria for sheds.

Ask the Expert Panel to be aware of trends for large sheds in the Master Planned Township Zone within peri-urban Adelaide Plains and consider existing policy parameters.

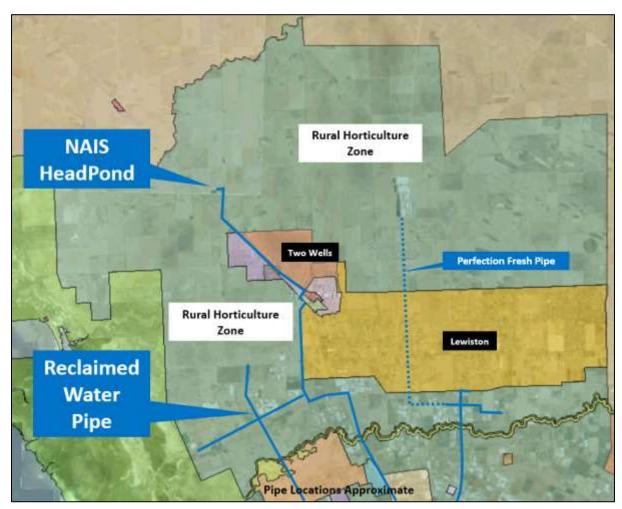
Conflict Between Agricultural Land Uses / Buffer Zones

As a peri-urban Council on the edge of a growing Greater Adelaide, Council is experiencing increasing potential for conflicts between different rural, agriculture and horticulture land uses e.g. broadacre cropping and horticulture.

Agri-business investment is continuing, growing local employment whilst diversifying through an increasing variety of agriculturally based land uses.

Planning and Design Code policy includes buffer or separation distances between different land uses. Buffer distances and activities excluded from being able to occur within that buffer have the potential to impact on the ongoing use of land.

Acknowledging current pricing challenges with the Northern Adelaide Irrigation Scheme, the extensive broadacre cropping areas between the Light River extending to the Gawler River are envisaged for further intense value adding agribusiness and horticultural investments. This land area is a key part of the Food Bowl intent in the 30 Year Plan for Greater Adelaide, and was subject to rezoning through the Northern Food Bowl Protection Areas Development Plan Amendment in 2018. It will be important that Planning and Design Code policy is up to date to address potential for land use conflict whilst maximising agricultural yield.



The Rural Horticulture Zone has a total area of 17,600 hectares

The Expert Panel is advised of increasing risk of land use conflict between envisaged diversification of agricultural uses within established broad acre farming areas.

The Expert Panel is requested to identify a review is required of buffer and separation distances within the Planning and Design Code.

EPLANNING AND PLANSA

Development Assessment Portal

The Local Government Assessment Manager Forum submission (**Appendix B**) supports the Expert Panel's observation that there should be a review of the Development Assessment Portal (DAP).

The submission states 'It is essential that urgent enhancements are prioritised as the current DAP limitations are significantly affecting the performance of the development assessment process.'

'Given the critical role of the DAP in the system, the Expert Panel is requested to review the governance and resourcing that is necessary to sustain the DAP. There appears to be an inherent limitation with the current governance model of PlanSA determining and progressing enhancements. While there have been many enhancements, acknowledging the efforts of the department to address what they can, there remain many more that are outstanding.'

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the governance and resourcing that is necessary to sustain the Development Assessment Portal.

Verification

The Local Government Assessment Manager Forum submission (Appendix B) outlines:

- The verification process of information lodged with a development application under the PDI Act is much more resource intensive.
- The increased requirements are not equally placed on an applicant to submit a complete development application.
- The system fails to account for the nuanced link between requesting full information from an applicant and the relevant authority advising the applicant at an early stage that changes are required to the proposal.
- The importance of understanding contextual information, such as COVID government stimulus, influencing processing time metric data from the Development Assessment Portal.
- A request for the Expert Panel to consider training for all participants in the industry, education, and DAP system solutions, ahead of imposing penalties on the local government sector that is facing the same resourcing challenges as other sectors.

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the approach to verification of information submitted for development applications and the use of data from the Development Assessment Portal.

Appendix A Council 2021 Submission to EFPA Review

ENVIRONMENT AND FOOD PRODUCTION AREAS REVIEW



• Submission to State Planning Commission

July 2021

Contents

SCOPE OF REVIEW	15
ABOUT THE EFPA	16
OBSERVATIONS	18
EFPA Generally Aligns with Strategic Goals of Adelaide Plains	18
EFPA Not Allowing Housing with Horse Keeping or Dog Kennelling Needs Review	20
EFPA Rules Not being reflected in the Planning and Design Code is Discordant and Needs Immediate Change	22
EFPA Rural Living Settlement Employment Needs Review	23
Two Wells Planned Urban Growth Challenges and Opportunities	37
Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land	42

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

Adopted by Council 26 July 2021

Scope of Review



The vast majority of land in Adelaide Plains is impacted by the EFPA

Adelaide Plains Council (Council) acknowledges the opportunity to provide input to the Commission with respect to the Environment and Food Production Areas (EFPA) Review.

The Commission is satisfied there is sufficient supply of land across Greater Adelaide to support housing and employment growth over the next 15 years. Therefore, the Commissions review is confined only to consideration of variations to the boundary which are trivial in nature and will address a recognised anomaly².

Comment to Commission:

The matters raised in Council' submission fit within the EFPA review scope of being a recognised anomaly or trivial in nature.

² The Planning, Development and Infrastructure Act 2016 sets out that when considering any proposed variances to the EFPA, the Commission must be satisfied with the following tests:

[•] Test 1: area/s within Greater Adelaide outside the EFPA are unable to support the principle of urban renewal and consolidation of existing urban areas, and

[•] Test 2: adequate provision cannot be made within Greater Adelaide outside the EFPA to accommodate housing and employment growth over a minimum 15-year period; or

[•] Test 3: variation is trivial in nature and will address a recognised anomaly.

About the EFPA

The EFPA³ has been introduced to achieve the following goals:

- Protect our valuable food producing and rural areas as well as conserving our prized natural landscapes, and tourism and environmental resources
- Support our sustainable growth and encourage the building of new homes in our existing urban footprint where supporting infrastructure already exists
- Provide more certainty to food and wine producers as well as developers on the direction of future development in metropolitan Adelaide.

These goals are given legal effect through the *Planning, Development and Infrastructure Act 2016* having a direct role in the ability to subdivide land for residential purposes within the EFPA. This is summarised below.

SUMMARY OF PDI ACT REQUIREMENTS FOR PROPOSED LAND DIVISION FOR RESIDENTIAL

PURPOSES WITHIN THE EFPA **Summary of Act Implications** If the proposed development creates lots for residential Development proposing lots for development, the relevant authority must refuse residential purposes MUST be development authorisation refused. If the proposed development creates 1 or more lots, a A planning authority's proposed planning authority (such as CAP or staff under delegation), decision to approve lots for nonmust not grant development authorisation unless the residential purposes MUST be Commission concurs. concurred with by the Commission and any approval IS SUBJECT to the If the Commission is the relevant authority, the Commission condition that the lots not be used must not grant development authorisation unless the council for residential purposes. concurs No appeal lies against a refusal to grant development authorisation Development authorisation is subject to the condition that the lots created will not be used for residential development. Development proposing lots for the following purposes may Dwelling with primary production, be consented: motel, hotel or other temporary residential accommodation can be

hotel

dwelling for residential purposes on land used primarily

for primary production.

considered regarding the Planning

and Design Code.

⁻

plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production _areas#have_your_say_on_the_efpa_review

motel	Primary production may not include		
any other form of temporary residential accommodation	horticulture, or animal husbandr		
for valuable consideration	depending on the specific nature o		
	the activity		
Land division for residential purposes able to be assessed	The two year period enabled		
during a transitional period that expired 31 March 2019	divisions for residential purposes to		
	be lodged. Such development		
	applications are no longer possible.		

are

available

via

Frequently asked questions about the EFPA plan.sa.gov.au/ data/assets/pdf file/0011/282935/FAQ - Environment and Food Production Areas.pdf

Observations

Discussions with planning assessment staff and their experience of assisting customers understand how they can develop their land has informed Council's views about the EFPA.

EFPA Generally Aligns with Strategic Goals of Adelaide Plains

Council's Strategic Plan 2020 – 2024 identifies a vision for the Council area. How the EFPA relates to that vision is commented on below:

Vision	How EFPA aligns?
Adelaide Plains is:	
Productive: A leading supplier of primary produce to local, national and international markets. Proximity to markets and natural growing conditions provide competitive advantages for primary producers on the Adelaide Plains that has seen our economy emerge as a key contributor to the region's prosperity.	EFPA aligns well with the primary production role of agricultural areas.
Diverse: A more diverse community with access to a greater mix of local opportunities. Increased employment, services and education attracts and retains a diverse community that chooses to live, learn and work in the region.	EFPA aligns well with the primary production role of agricultural areas, undergirding the suitability of these areas for related investment
Location: A lifestyle location connected to the Barossa, Coast and Adelaide. Adelaide Plains is a quiet community that offers residents time and space with convenient access to the benefits of Greater Adelaide, the coast and the Barossa region.	No clear alignment
Welcoming: A proud, spirited and generous community. This is a place that everyone belongs, where community connection and care is strong and someone is always available to help when a neighbour is in need.	No clear alignment
Ambition: Advancing infrastructure and technology to foster a competitive local economy. Modern practice, research and innovation, and efficient access to export centres and local markets builds an economic environment and reputation that rivals the State's major primary productions regions. With employment opportunities diversifying and new housing products in abundance, Adelaide Plains will become the place of choice for the Northern Adelaide Plains.	EFPA aligns well with the primary production role of agricultural areas, undergirding the suitability of these areas for related investment, including infrastructure and technology

Vision	How EFPA aligns?
Leadership: A decisive and proactive Council. Our Elected Members share a vision of prosperity founded on courage, robust deliberation, transparency and forward thinking and investing	Council has the opportunity every five years to deliberate about the EFPA and its alignment with the vision of the Council area
Attractive: A Place of choice for businesses, residents and visitors. Our townships are inviting, well cared for, filled with character and provide a range of services,	EFPA aligns well with the suitability of townships for residential development, undergirding their role in providing services.
facilities and accommodation that caters for all people and our landscapes, events and infrastructure provide memorable experiences.	This submission identifies observations about the EFPA that warrant review in order to ensure maximum alignment with Council's vision.

Comment to Commission:

The EFPA generally aligns with Council's vision for Adelaide Plains as identified in the Strategic Plan 2020 - 2024, noting various matters require review and amendment.

EFPA Not Allowing Housing with Horse Keeping or Dog Kennelling Needs Review

The PDI Act allows subdivision for housing⁴ in the EFPA where it is directly associated with 'primary production'.

Advice received is that 'primary production' does not include horse keeping or dog kennels as these uses, while agricultural in nature, do not result in the 'production' of a naturally occurring food or consumable item.

This means, for example, subdivision for a dwelling with horse keeping or dog kennelling triggers the EFPA whereas the same division for dwelling with primary production would not.

This presents a fundamental problem for the development of land in Zones where the Code envisages subdivision for dwellings with horse keeping or dog kennelling, such as the Rural Living Zone and Animal Husbandry Sub-Zone.

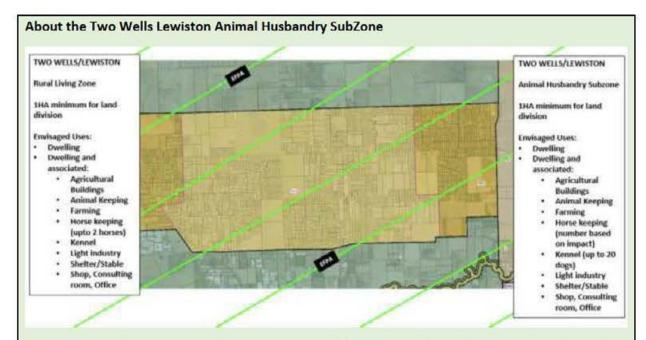
ZONES WHICH ENVISAGE SUBDIVISION FOR A DWELLING WITH HORSE KEEPING OR DOG KENNELLING			
Zone	Dwelling with Horse Keeping	Dwelling with Dog Keeping	
Animal Husbandry Sub Zone	Yes	Yes	
Rural Living	Yes	Yes	
Rural Horticulture	Yes	Less certain	
Rural	Yes	Less certain	

This is a particular problem with the Animal Husbandry Subzone. The prime purpose of the Zone is 'Large-scale horse keeping and dog kennelling in association with detached dwellings on large allotments'⁵. This zone/sub-zone has been in place in the Mallala Development Plan and now Planning and Design Code for many years, and the character of the area is largely influenced by the many dog kennels, dog breeding and horse keeping land uses.

-

⁴ Section 7(18) of the *Planning Development and Infrastructure Act 2016* nominates that for the purposes of the EFPA, "'residential development' means development primarily for residential purposes but does not include— (a) the use of land for the purposes of a hotel or motel or to provide any other form of temporary residential accommodation for valuable consideration; or (b) a dwelling for residential purposes on land used primarily for primary production purposes."

⁵ Planning and Design Code 2021



The Animal Husbandry Subzone can be developed with large-scale horse keeping and dog kennelling in association with dwellings. The prime difference from Rural Living is the Animal Husbandry Zone explicitly provides for up to 20 dogs/lot (as Deemed to Satisfy) and unlike the Rural Living Zone, does not limit horses to two/lot.

This area of Two Wells/Lewiston has been planned – including through the SA planning system – for more than 30 years for animal husbandry and associated residential development.

Comment to Commission:

The Environment and Food Production Area not allowing subdivision for housing associated with horse keeping or dog kennelling, where it is consistent with zoning policy, requires immediate review and clarification.

The current statutory arrangements are limiting investment for envisaged development within the Animal Husbandry Subzone, Rural Living Zone, Rural Horticulture Zone and Rural Zone and causing confusion within the community.

EFPA Rules Not being reflected in the Planning and Design Code is Discordant and Needs Immediate Change

A land owner can read the Planning and Design Code and conclude Rural Living Zoned land can be subdivided for housing. However, nowhere does the Code say the land can-not be subdivided due to the EFPA.

This challenge can be called discordant and a policy misalignment. It also leads to poor outcomes for customers of the planning system who are trying to make informed investment decisions.

Council planning officers undertake innumerable conversations with people seeking to acquire property having to explain that whilst the Code says one thing, the EFPA says the opposite. This occurs for instance, in all Rural Living Zones, but is a particular issue in Two Wells/Lewiston Rural Living Zone, Animal Husbandry Subzone due to the large size of the area. This is not an ideal planning system.

The Planning and Design Code is emerging as a customer friendly and easily navigable digital statutory planning instrument. The Code is being used by landowners, investors, land agents, businesses, residents, developers and planners.

The Commission and PLUS's ongoing work fine-tuning the Planning and Design Code is supported.

Given the user value of the Planning and Design Code for certainty, the lack of the EFPA 'rules' being reflected directly in the Code needs change.

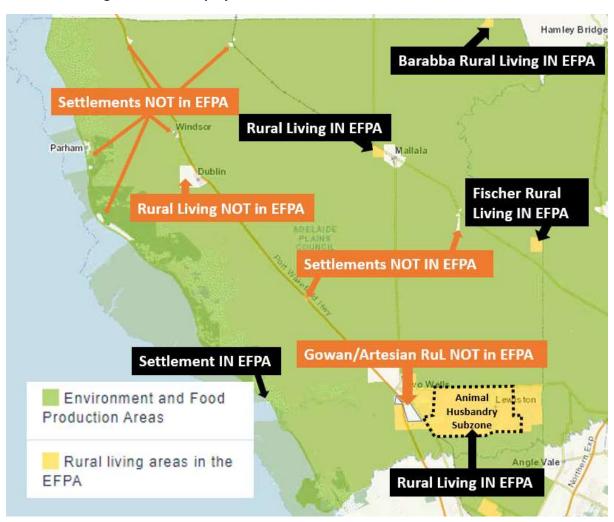
Comment to Commission:

The Environment and Food Production Area provisions should be explicitly communicated directly in the Planning and Design Code.

The current system providing for the Code to express one thing about land and the Environment and Food Production Area to express the opposite needs amendment.

The current arrangements are confusing and a handbrake on investment.

EFPA Rural Living Settlement Employment Needs Review



Zoning	IN the EFPA	NOT In the EFPA
Rural Living	Barabba, Mallala, Fischer, Two	Dublin and Gower/Artesian
	Wells, Lewiston	
Settlements	Middle Beach	Wild Horse Plains, Long Plains, Windsor, Light, Redbanks, Parham, Webb Beach and Thompsons Beach
Employment Land	Part South West Mallala Part West of Two Wells Carslake Road Adjacent Mallala Raceway	Part South West Mallala Part West of Two Wells

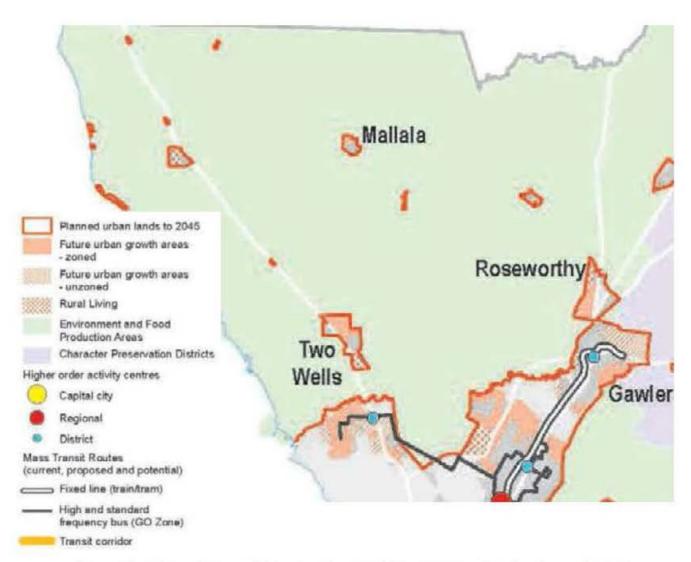


Rural Living Areas NOT included within the EFPA (being Dublin and Cowan/Artesian) seem to correlate with being planned as 'urban lands' in the 30 Year Plan for Greater Adelaide. Conversely, Rural Living Areas WITHIN the EFPA (e.g Mallala, Two Wells and Lewiston) seem to correlate with not being planned as 'urban lands' in the 30 Year Plan for Greater Adelaide.

Whilst the Rural Living Zone itself provides certainty that subdivision into 1HA lots for residential purposes is appropriate, the EFPA mandates that land division for residential purposes must NOT be approved.

Therefore Rural Living Zoned land within the EFPA is not able to be subdivided for housing alone, despite the intent of the zone in the Planning and Design Code. Existing lots can be developed for housing, or for other uses envisaged in the Rural Living Zone, but no further lots for residential/rural living purposes alone can be created. Further lots can be created for housing and primary production, or housing and some form of non-residential use. The current arrangement creates unnecessary conflict for applicants and authorities when it comes to attempting to divide parcels of land consistent with the intent of the zone.

Within the settlements, subject to the Planning and Design Code, subdivision for residential can obtain consent. Middle Beach is recognised as at greater inundation risk and various investigations have informed the risk management measures in place.



Map of the EFPA and Planned Urban Lands to 2045 - Map 3 30 Year Plan for Greater Adelaide

Comment to Commission:

The Environment and Food Production Area precluding the ability to build a dwelling on Rural Living zoned land has the potential to place pressure for urban development (housing) on primary production and horticulture zoned land. Council questions the rationale for the Environment and Food Production Area applying to Rural Living zoned land.

The below table provides background and analysis about each Rural Living Area

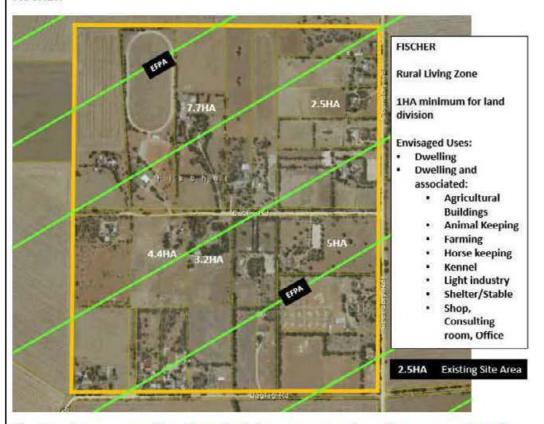
Rural Living - Employment - Settlement Zones EFPA Background

BARABBA



The EFPA limits potential residential subdivision into 1HA lots of the nine lots greater than 2HA

FISCHER



The EFPA limits potential residential subdivision into 1HA lots of approximately 18 lots greater than 2HA.

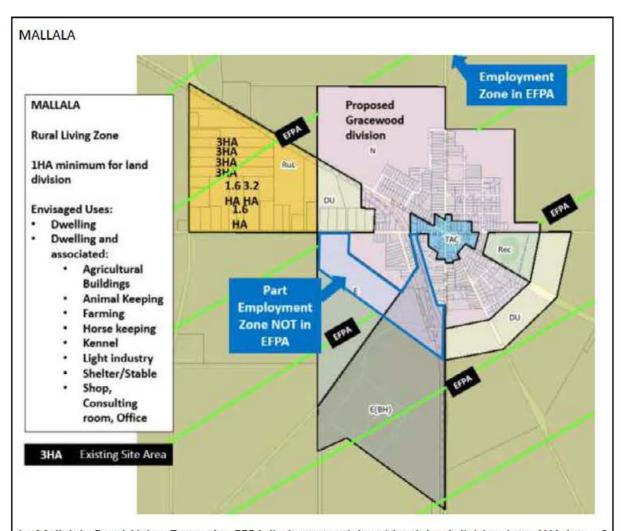


At Dublin, the EFPA does NOT apply. Some 20 lots are greater than 2HA and with potential for subdivision into 1HA lots for rural living (without an associated non-residential use) subject to assessment regarding the Planning and Design Code

Council provided an in-principle letter of support to Leinad Land Developments (Dublin) Pty Ltd (Attachment A) to advocate for boundary change to the EFPA. This letter arose from a Council decision of 23 September 2019:

"that Council, having considered Item 21.5 – *Environment and Food Production Areas*, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- 1) progress the review of relevant strategic holdings that are currently impacted by the *Environment and Food Production Areas* legislation with the *Department of Planning, Transport and Infrastructure* and the *State Planning Commission* as part of the 5 yearly review of the *Planning, Development and Infrastructure Act 2016 (Section 7)*.
- 2) provide in-principle letters of support to **Leinad Land Developments (Dublin) Pty Ltd** and the Hicks Group to enable both parties to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report."



In Mallala's Rural Living Zone, the EFPA limits potential residential subdivision into 1HA lots of approximately 12 lots greater than 2HA.

The Rural Living area is west of land zoned as Deferred Urban. The Deferred Urban Zoning holds the land for future urban development to be released through a future rezoning. The Deferred Urban zone was applied around 2015 to land formerly zoned Rural Living. This is also the case for Deferred Urban Land to the south east. The 2015 rezoning created a suitable zoning framework for the Gracewood development. Noting discussions are ongoing, Gracewood is yet to obtain a formal planning consent.

The employment zoned land to the south west is part in/part not the EFPA. Noting the EFPA precludes subdivision for housing, and noting other land available for this purpose, the EFPA poses no barrier. This is also the case for the land adjacent the Raceway

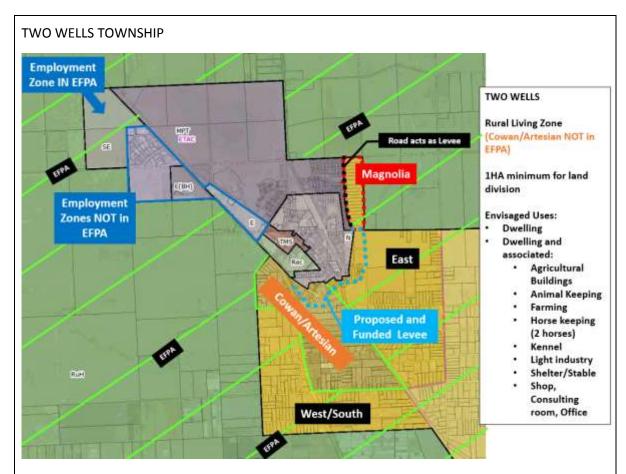
Comment to Commission:

Council requests the EFPA be lifted from the Rural Living land

The rationale for not allowing subdivision for rural living is not clear.

Mallala's Rural Living Area has a similar siting to Dublin's Rural Living Area.

If the EFPA is lifted, it would allow subdivision for Rural Living, this being a different housing offer to other Zones in Mallala, and the anticipated housing forms in the Gracewood development.



The EFPA does NOT apply to the Cowan/Artesian part of the Rural Living Zone immediately south of Two Wells. This means subdivision for rural living (without an associated non-residential use) of numerous larger lots is possible subject to assessment regarding the Planning and Design Code.

A levee is proposed and funded east and south of Two Wells, and to be constructed over the next two years. The levee alignment is based on a key creek catchment flow. Outside the Cowan/Artesian area, and within the levee area, the EFPA limits potential residential subdivision of several larger lots and numerous lots around 1000sqm and greater. The EFPA should be lifted from within the Levee area as should also the Rural Living Zoning.

North of Gawler Road are Rural Living lots east of Magnolia Boulevard in the Eden development and being developed for housing. A stormwater easement is over part of the lots. Lots are 1-1.3HA aside from the Lot fronting Sharpe Road which is larger than 2HA. It's unclear what purpose the EFPA serves by applying and this should be reviewed.

The employment zoned land either side of Port Wakefield Road has the EFPA apply inconsistently. Given the EFPA's limit on residential subdivision, the rationale for this inconsistent approach is not apparent.

Council provided an in-principle letter of support to the Hicks Group (Attachment A) to advocate for boundary change to the EFPA. This letter arose from a Council decision of 23 September 2019:

"that Council, having considered Item 21.5 – Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and Infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and Infrastructure Act 2016 (Section 7).
- 2) provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report."

Comment to Commission:

Rural Living Zoned Land

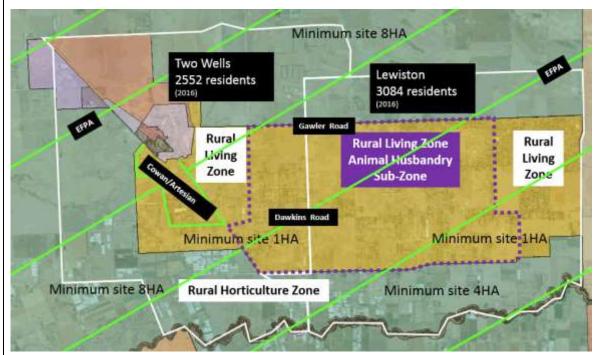
The EFPA applying within the area of the funded levee should be lifted. Council expresses interest in investigations commencing with respect to the Rural Living Zoning within this area.

Likewise, noting Magnolia Boulevard serves as a levee, the EFPA serves no purpose applying to land zoned Rural Living and being developed in that manner on the east side of Magnolia Boulevard. Council requests the EFPA be lifted from this area.

Employment Land

The application of the EFPA inconsistently to employment land either side of Port Wakefield Road should be reviewed. Noting the EFPA's function to preclude subdivision for housing, and the envisaged significant residential growth of Two Wells, the potential need for this land for housing is not apparent whereas employment land for town based commercial, non-town centre uses is anticipated. On this basis, The Environment and Food Production Area should apply consistently to employment land on both sides of Port Wakefield Road at Two Wells.

TWO WELLS/LEWISTON RURAL LIVING AND ANIMAL HUSBANDRY



The EFPA limits potential subdivision for rural purposes (without an associated non-residential use) of lots larger than 2HA throughout Two Wells and Lewiston.

The Code envisages both the Animal Husbandry Sub Zone and Rural Living being able to be subdivided and developed for housing along with horse keeping, dog kennelling, horticulture, shop, consulting, offices and light industry. The Animal Husbandry Subzone can be developed with large-scale horse keeping and dog kennelling in association with dwellings.

Both the Rural Living Zone and Animal Husbandry sub-zone anticipate subdivision for residential development in its own right meaning applicants don't necessarily have to breed dogs or keep horses. Development can be purely for a rural residential lifestyle.

The prime difference from Rural Living is the Animal Husbandry Zone explicitly provides for up to 20 dogs/lot as Deemed to Satisfy and unlike the Rural Living Zone, does not limit horses to two/lot.

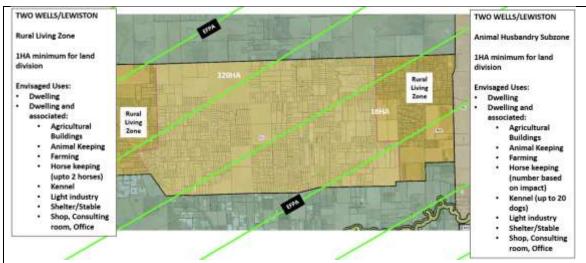
This area of Two Wells/Lewiston has been planned – including through the SA planning system – for more than 30 years for animal husbandry.



The Animal Husbandry Subzone envisages sites developed for housing with horse keeping or dog breeding businesses. Standalone Residential Living is also envisaged. Photo near Hams Park, Lewiston, May 2021



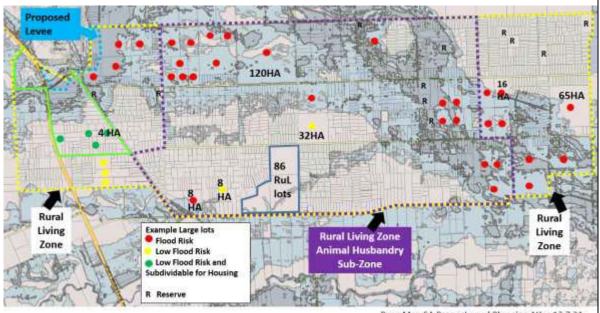
Rural Living Lots form Dunlop Boulevard, Lewiston, having been developed since 2015



Council made submissions in 2019 and 2020 to consultation on the draft Planning and Design Code (Code). With the operation of the Code from March 2021, this submission takes the opportunity to inform the Commission about the Council's experience of the EFPA and the Code with respect to the Two Wells/Lewiston Rural Living and Animal Husbandry area.

Note 1: the barrier raised earlier about the EFPA limiting subdivision for low intensity residential living where associated with horse or dog keeping is assumed as being corrected.

Note 2: the lack of the EFPA being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone is assumed as being corrected.



Base Map SA Property and Planning Atlas 13 7 21

Two Wells Lewiston Larger Lots and Flood Risk

The Two Wells Lewiston Larger Lots and Flood Risk map shows:

- Flood risk impacts about half the area
- The red dots are 32 example large lots (typically larger than 8HA) impacted by flood risk
- The yellow dots are 2 example large lots with low flood risk
- Rural living lots are typically 20 times larger than the average suburban block.
- Remnant larger land holdings are mostly surrounded by 1 hectare land holdings.

- 86 rural living residential lots are being developed. These were lodged prior the EFPA limiting residential subdivision becoming operational in March 2019.
- There are several large lots able to be subdivided for residential rural living in the Cowan/Artesian area
- Excluding the Cowan/Artesian area, Rural Living (including Animal Husbandry) comprises 34 square kilometres.

Whilst the Planning and Design Code envisages the Rural Living and Animal Husbandry as being able to be subdivided to 1HA for housing, since March 2019, that is precluded by the EFPA.

Along with inquiries about subdivision for rural living in Two Wells/Lewiston's Rural Living Zone, Council's planners also receive numerous inquiries about building a house on 8HA lots in the Rural Horticulture Zone. Inquirers outline that land is hard to find in Lewiston. The extent that this is a risk for land in the Rural Horticulture Zone should investigated. An inability to build a dwelling on Rural Living zoned land has the potential to place pressure on primary production and horticulture zoned land.

The EFPA's limit was introduced in 2019 after a period enabling residential subdivisions to be lodged, and subdivisions – including the 86 lot proposal - are yet to be brought to market.

The Cowan/Artesian Area is able to be subdivided for rural living housing, this presenting potential supply with several larger lots that could be subdivided over the next five years. Siting adjacent to Two Wells acts to reinforce the township.

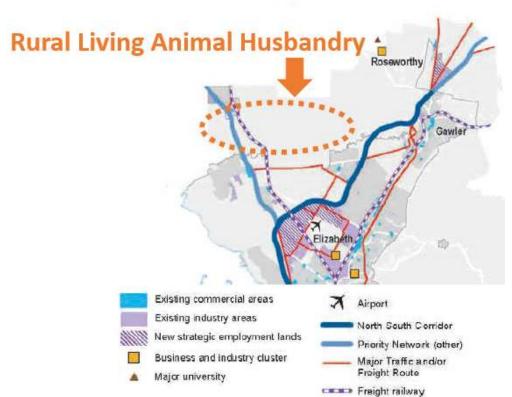
Comment to Commission:

Council is open to the Environment and Food Production Area continuing in place over Two Wells / Lewiston Rural Living Zone and Animal Husbandry Subzone until, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:

- a. The barrier of the Environment and Food Production Area limiting subdivision for low intensity residential living where associated with horse or dog keeping being corrected.
- b. The lack of the Environment and Food Production Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.

30 YEAR PLAN FOR GREATER ADELAIDE

The 30 Year Plan for Greater Adelaide includes the Rural Living Animal Husbandry Area within the EFPA. The 30 Year Plan is however silent about the areas business future and also the wider areas envisaged horticultural future.



Map 4 — Business and industry clusters

The 30 Year Plan is silent about the Animal Husbandry area as a form of business cluster



The 30 Year Plan is silent about the envisaged development of horticulture in the southern third of Adelaide Plains. This area is within a Rural Horticulture Zone

Comment to Commission:

The 30 Year Plan for Greater Adelaide should better reflect the Animal Husbandry Zone as a business cluster and the envisaged development of horticulture in the southern third of Adelaide Plains.

Two Wells Planned Urban Growth Challenges and Opportunities

A portion of Adelaide Plains including Two Wells is sited within the 'Outer North' of Greater Adelaide. Analysis of housing and employment land supply is contained within the Land Supply Reports⁶ for Greater Adelaide released by the Commission (see <u>Relevant Extracts for APC from the Land Supply Reports</u>)

For Adelaide Plains, the land supply reports provide updated numbers associated with Two Wells housing estates. The commentary affirms the impact of the northern connector in terms of reduced vehicle travel times to Greater Adelaide underpinning demand for land for housing and employment purposes.

Building applications have increased from around 60/annum to above 100, with 2020/21 having 294 to the end of May. This is a significant rate of building activity.

Recognising the EFPA supports planned urban growth, it is suggested the following comments be provided to the Commission about planned urban growth

Comment to Commission:

Recognising the Environment and Food Production Area surrounds Two Wells' planned urban growth, Council intend to continue investigating, planning, delivering and advocating for the necessary economic and social infrastructure to support liveable growth at Two Wells. Council welcomes further dialogue with the Commission about this.

⁶

plan.sa.gov.au/our planning system/instruments/planning instruments/environment and food production _areas#have your say on the efpa review_

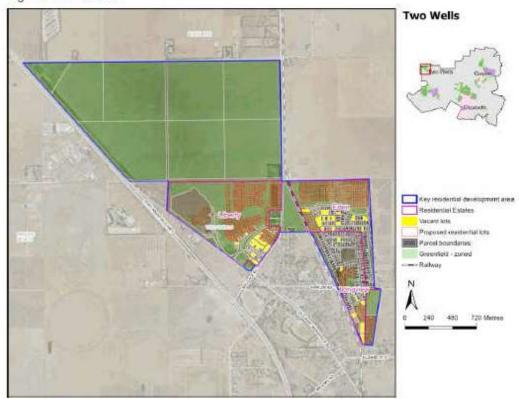
GREENFIELD LAND SUPPLY - OUTER NORTH

LAND SUPPLY REPORT FOR GREATER ADELAIDE

Table 4: Greenfield land supply by sub-region and key development front - Outer North, June 2020

STATUS		The state of the s		/ELOPED INED	FUTURE URBAN GROWTH AREA	
Sub Region & Development Fronts	Area (ha)	Lots	Area (ha)	Estimated Lots	Area (ha)	Estimated Lots
GAWLER	N 59		100	× .	N 9	
Gawler East	180	1,521	3	29	-	
Gawler South	18	151	58	490	75	
Evanston Gardens	41	391	40	388	43	410
Evanston South	4	75	57	973		
Roseworthy	102	871	237	2,030	29	248
Concordia		-	-	12	949	10,000
TOTAL	345	3,009	396	3,910	1,021	10,658
PLAYFORD	0 60					
Playford Alive	10	221	101	2,278		0
Playford North Extension	96	1,402	409	5,996	7	107
Munno Para	16	295	89	1,615		
Munno Para West	13	205	15	234		
Blakeview	7	123	289	5,360	-	-
Angle Vale	198	2,431	314	3,848	3	36
Eyre	10	165	82	1,305	18	-
TOTAL	350	4,842	1,299	20,635	10	143
VIRGINIA/TWO WELLS			55 5	6 46 4	6 6	
Virginia	59	723	103	1,250	301	3,663
Buckland Park	315	3,344	560	5,953	526	5,587
Two Wells	62	478	273	2,108	-	
TOTAL	436	4,545	936	9,312	827	9,250
OUTER NORTH TOTAL	1,131	12,396	2,631	33,857	1,858	20,051

Figure 23: Two Wells



KEY MEASURES

Year Commenced	Pre-2010
Estimated dwelling capacity	2,875
Dwellings built since 2010	203
Average dwellings built per annum	19
Remaining Potential Capacity	2,672
Vacant lots	75
Development Ready (proposed lots)	478
Undeveloped Zoned	2,108

ANALYSIS

- 3 estates currently under development.
- Since 2018 the rate of development has markedly increased, with over 70 dwelling completions recorded in 2018.
- There are current infrastructure deed arrangements in place. The availability of financial contributions to fund infrastructure is dependent on the rate of development. This needs to be continually monitored to ensure infrastructure bottle necks do not occur.
- Two Wells is not connected to a SA Water trunk sewer main and currently relies on a community waste water scheme to service dwellings.
- SA Water's potable water infrastructure is currently being upgraded in the area, including 4,500m of new pipework to improve water pressure and support projected growth.

2.4 Greenfield land supply to 2030

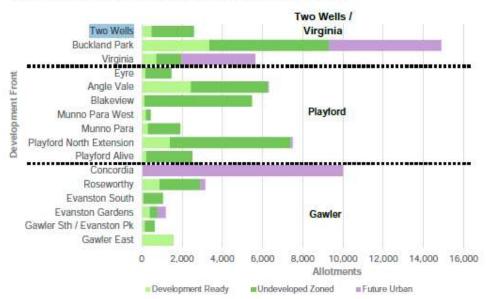


Over the last decade Greenfield development has accounted for 80% of all dwellings built in the region. This trend is assumed to continue into the next decade as additional land comes to the market and major infrastructure projects make land more accessible and desirable to a larger portion of the market.

A stocktake of Greenfield land supply within the region is illustrated in Figure 9 and Table 4, and shows the following:

- 19% of land supply is Development Ready.
- Over 5,400 Development Ready allotments are located within the Playford sub-region, with
 just under half these allotments located within the Angle Vale precinct.
- Over 50% of estimated allotment potential is located within Undeveloped Zoned land.
- It is estimated that undeveloped zoned land within the Playford sub-region could yield in excess of 20,000 allotments. The Playford North Extension will account for approximately 6,000 of these allotments.
- Future Urban Growth area land is estimated to yield 30% of total allotment potential for the region with land at Concordia estimated to have a total potential to create 10,000 allotments.

Figure 9: Greenfield land supply by development front, June 2020



2. EMPLOYMENT LAND SUPPLY - OUTER NORTH

2.1 Overview

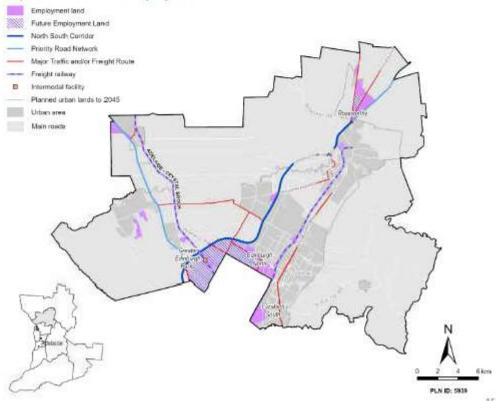


The Outer North region, as illustrated in Figure 11, accommodates an estimated 11% of total zoned employment land within Greater Adelaide and over 95% of all identified future employment land.

In 2020 it was estimated the regions zoned employment lands supported an estimated 5,500 jobs. Over 55% of these jobs were aligned with traditional employment activities, with manufacturing a significant contributor. Its share is projected to grow over the next ten years to 2030 as more land becomes available, and recently completed infrastructure makes land more accessible to key distribution networks and trade gateways.

Projected population growth in Two Wells, Gawler and Roseworthy will provide opportunities to facilitate growth of the regions employment lands driving demand for more population serving activities. This, along with further investigations into the future development of the Greater Edinburgh Parks, present the greatest opportunities for the region to over the next 10 years.

Figure 11: Outer North employment land overview



Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land



2a Wasleys Road Mallala SA 5502 PO Box 18 Mallala SA 5502 Tel = 08 8527 0200 Fax = 08 8527 2242 info@apc.sa,gov.au apc.sa.gov.au

ABN - 58384968672

D19/50876

24 October 2019

BH and SA Hicks Pty Ltd Mailala Road TWO WELLS SA 5501

Dear Mr Hicks

In-Principle Council Support for North East Two Wells Expansion - Hicks Group

As you are aware, Environment and Food Production Areas (EFPAs) were introduced through the Planning, Development and Infrastructure (PDI) Act 2016 to prohibit the further subdivision of land for housing to protect vital food and agricultural lands. The majority of the Adelaide Plains Council area is located within an EFPA and the effect of this legislation is to restrict land divisions for residential development to Council's main townships (Two Wells, Mallala and Dublin) and a number of other existing settlements only.

At an Informal Gathering on 25 March 2019, planning consultant Grazio Maiorano of URPS presented to Council Members on behalf of the Hicks Group in relation to the potential urban rezoning of land adjoining the Two Wells township in the medium to long term. The urban rezoning could facilitate approximately 850 new dwellings together with an appropriate level of recreation, open space and community facilities.

As you are aware, an amendment to the EFPA boundaries will be necessary before a potential rezoning and future development application can be progressed for this development proposal.

Following a formal request by the Hicks Group, as well as a separate request from Leinad Land Developments (Dublin) Pty Ltd, regarding a potential expansion of the Dublin township, Council at its Ordinary Meeting on 23 September 2019, resolved as follows:-

Item 21.5: Environment and Food Production Areas

Moved Councillor Maiolo Seconded Councillor Lush 2019/412

"that Council, having considered Item 21.5 – Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and Infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and Infrastructure Act 2016 (Section 7).
- provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the

Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report."

CARRIED UNANIMOUSLY

As per Council Resolution 2019/412 above, Adelaide Plains Council is pleased to provide in-principle support to the Hicks Group to advocate for boundary changes to the EFPA to allow for the future progression of long term rezoning objectives for the North East Two Wells expansion.

Subject to availability, Council staff will be keen to attend meetings with Grazio Maiorano of URPS and the Department of Planning, Transport and Infrastructure to progress this matter.

If you require any further information, please contact Rob Veitch, General Manager Development and Community on (08) 8527 0200 or

Yours sincerely

James Miller Chief Executive Officer



2a Wasleys Road Mallala SA 5502 PO Box 18 Mallala SA 5502 Tel – 08 8527 0200 Fax – 08 8527 2242 Info@apc.sa.gov.au apc.sa.gov.au

ABN - 58 384 968 672

D19/50832

24 October 2019

Mr Daniel Palumbo Leinad Land Developments (Dublin) Pty Ltd 55 Stanbel Road SALISBURY PLAINS SA 5109

Dear Mr Palumbo,

Dublin Township Expansion - Leinad Land Developments

As you are aware, Environment and Food Production Areas (EFPAs) were introduced through the Planning, Development and Infrastructure (PDI) Act 2016 to prohibit the further subdivision of land for housing to protect vital food and agricultural lands. The majority of the Adelaide Plains Council area is located within an EFPA and the effect of this legislation is to restrict land divisions for residential development to Council's main townships (Two Wells, Mallala and Dublin) and a number of other existing settlements only.

The potential expansion of the Dublin township was previously supported by Council backin 2014, when Leinad Land Developments proposed a developer-led Development Plan Amendment (DPA) to rezone land to the south of Dublin for residential purposes. Council endorsed the DPA together with a Funding Deed to finance the DPA. However, the DPA Statement of Intent (SOI) was rejected by the then Minister for Planning, the Hon. John Rau, on 20 February 2015 as the proposals were not considered to be in accordance with the State Planning Strategy at that time.

The DPA was intrinsically linked to a proposal for the construction of a local shopping centre at Dublin comprising 1700 square metres of gross floor area, including a small supermarket and five speciality shops. Development Plan Consent was granted for the shopping centre on 12 November 2015 and the operative period of this Development Plan Consent remains 'live' until 4 August 2020.

Since the granting of the Development Plan Consent and the rejection of the DPA, the introduction of the EFPA legislation through the 2016 PDI Act has prevented any further progress on the development proposals from occurring.

Following a presentation by planning consultant Richard Dwyer of Ekistics to Council Members on behalf of Leinad Land Development on 8 July 2019, a Motion on Notice was made at the Ordinary Council Meeting on 22 July 2019, which resulted in the following resolution:-

Environment Food Production Areas

Moved Councillor Keen

Seconded Councillor Lush

2019/323

"that the Chief Executive Officer formally write to the Department of Planning, Transport and Infrastructure and the Minister for Planning to give advanced notice of Adelaide Plains Council's desire to have strategic holdings reviewed throughout the Council area as part of the imminent Environment Food Production Areas review process."

CARRIED

As per the above resolution, I wrote to the Hon. Stephen Knoll MP, Minister for Transport, Infrastructure and Local Government on 23 July 2019. To date, no reply has been received.

Following formal requests by both Leinad Land Developments, as well as the Hicks Group regarding a potential development at Two Wells, Council at its Ordinary Meeting on 23 September 2019, resolved as follows:-

Item 21.5: Environment and Food Production Areas

Moved Councillor Maiolo Seconded Councillor Lush 2019/412

"that Council, having considered Item 21.5 – Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and Infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and Infrastructure Act 2016 (Section 7).
- 2) provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report."

CARRIED UNANIMOUSLY

As per Council Resolutions 2019/323 and 2019/412 above, Adelaide Plains Council is pleased to provide in-principle support to Leinad Land Developments to advocate for boundary changes to the EFPA to allow for the future progression of long term rezoning objectives for the expansion of the Dublin township.

If you require any further information, please contact Rob Veitch, General Manager Development and Community on (08) 8527 0200 or



Chief Executive Officer

Appendix B Local Government Assessment Manager Forum November Submission

18 November 2022

Mr John Stimson Presiding Member Expert Panel Planning System Implementation Review

DTI.PlanningReview@sa.gov.au

Dear Mr Stimson

This submission is made by the recently formed Local Government Assessment Manager Forum (LGAMF). The LGAMF represents Accredited Professionals (Level 1) employed in the Local Government sector who perform the duties as an Assessment Manager.

As a key group of accredited professionals within the planning system, the members of the LGAMF has a strong interest in facilitating the delivering a system that serves the diverse needs of the community. The LGAMF acknowledged the significant effort of the department in transitioning the State to the new system. There is general support for the reforms. This submission is focussed on specific matters of interest to the LGAMF that are considered to require further consideration in development assessment.

The LGAMF welcomes the opportunity to work with the Expert Panel to further enhance the planning and development system. In particular, the LGAMF request the Expert Panel consider the following matters.

- Deemed Planning Consents
- Deemed Development Approvals / Minor variations
- Assessment Timeframes
- Development Assessment Portal
- Verification

Deemed Planning Consent

The need for an efficient and responsive development assessment process is supported. However, the Deemed Planning Consent provision is having extremely negative impacts on workplace culture, and contributing to staff leaving the local government sector. This, combined with very short assessment times for what can be quite complex matters, results in a greater likelihood of applications being refused, or substandard designs that do not meet the provisions but are just good enough being approved to avoid a deemed consent rather than working with applicants to achieve a design that can be supported to better deliver the intent of the policy. This is inconsistent with the objects of the Act to promote *high standards for the built*

environment. It is a severe penalty that does not adequately consider the consequences for the community for development that is inappropriate.

It is noted in the discussion paper there have not been many deemed planning consents issued. It is not the case that the number of those issued reflects the considerable stress that sits with every application to avoid this occurring. Planning staff do not feel they can take extended leave due to the potential that one of their applications will tick down to a deemed consent and the workloads associated with other planners in the team do not facilitate easy management of applications when others are away. Councils have had to take on more planning staff to keep workloads to a level that allow timely interaction with applications and does not result in time overruns to assess the same or similar application numbers overall to those managed with fewer planners under the Development Act.

Assessment Managers are of the view the deemed consent approach does not provide a basis for collaborative relationships with applicants that in turn deliver more appropriate planning outcomes. This provision does not take into consideration the well documented shortage of professionals within the sector and the challenges in establishing a sustainable work environment for the relevant assessing officers where they can apply their skills to the delivery of outcomes that benefit all, in line with the relevant assessment policy.

The consequence of this provision is to extend the assessment times for simpler development applications, as greater attention is required on the more complex developments that generally have the same assessment times. Furthermore, this is leading to less capacity to provide preliminary advice to applicants which is a highly valuable non-statutory service to assists applicants.

It is noted in the jurisdictional comparison contained in the Panel's discussion paper, only Queensland utilises this mechanism and New South Wales has adopted a deemed refusal mechanism. Other jurisdictions such as Victoria, Western Australia and Tasmania have taken a more balanced approach, whereby a review is undertaken by the respective courts on the facts and the court makes a considered and independent determination on the application. This is considered to be a more equitable approach that will safeguard the community against potential poor development outcomes while removing the risk of instant approvals for inappropriate outcomes.

Deemed Approval / Minor Variations

The discussion paper identifies instances where planning and building consent has been issued for a development application, but councils are not accepting the planning consent issued by the private accredited professional. The paper assumes the council as the *problem* and does not examine the reasons why the approval is not being issued by the council. The Act requires a council to check that the appropriate consents have been sought and obtained for a development application. This is an important mechanism that safeguards applicants / owners from commencing development with inconsistent or invalid consents. The absence of this important check is likely to result in non-compliances being identified during construction, leading to more significant and costly delays.

In many instances where development approval has not been issued, it is evident some private accredited professionals have acted outside their powers under the Act. This issue is directly related to the accredited professionals incorrect assessment which missed or dismissed key assessment criteria, including the application of Overlays such as the Historic Area Overlay. There are some examples of accredited professionals interpretation being such that they have effectively undertaken a performance assessed development, including on notifiable development.

This issue is exacerbated with the ambiguity that is created with s106(2) of the Act in relation to minor variations. The Deemed to Satisfy (Minor variations) is subject to various interpretations and has created uncertainty and delayed approvals, as identified by the Panel's discussion paper. This varying interpretation has resulted in poor outcomes for applicants. The difficultly with the interpretation was highlighted when a cross sector working group established by PLUS was unable to define what constitutes minor variations.

This legislative ambiguity is contributing to a tension between the practice of some private accredited professionals and council practitioners. There needs to be greater guidance/training for relevant authorities on respective roles and what constitutes a minor variation for Deemed to Satisfy developments to address the current inconsistent approach. This could be informed with clear parameters such as a minor variation may only be granted:

- · by an Assessment Manager at council, or
- by privately certifiers where the element does not have an impact beyond the site. E.g. excludes site area, frontage, setbacks, building heights, length on boundary and the like; and there is accountability / transparency with clearly documented justification for any minor variations.

Assessment Timeframes

The discussion paper suggests a review of assessment timeframes. This review is supported as the current timeframes do not adequately differentiate the work that is required to properly assess more complex assessments such as larger commercial and industrial type applications. It is recommended the assessment timeframes for complex development, not involving up to two (2) class 1 buildings or any class 10 buildings, should be 8 weeks as the current assessment timeframes are not adequate and do not facilitate the promotion of high standards for the built environment. It is not reasonable to expect an application for 19 plus dwellings or large scale warehousing to be assessed in 20 days, yet this is currently the case. The Panel may wish to also consider the gross time for the completion of assessments to gauge the overall impact of the new system and whether there are broader legislative / DAP enhancements that may be necessary.

Development Assessment Portal

The Development Assessment Portal, while having developed some positive change, has not yet delivered the efficiencies that were expected from the reform, notwithstanding the many enhancements that have made since its introduction. The local government sector has contributed significant resources towards supporting the identification of issues and enhancements in the DAP. PlanSA has been provided with an extensive list of issues and it is acknowledged the department has generally sought to progress enhancements. Critical changes are however urgently required, as the

Discussion Paper – ePlanning System and PlanSA website Reform Options has identified. It is essential that urgent enhancements are prioritised as the current DAP limitations are significantly affecting the performance of the development assessment process. For example:

- The current DAP is too linear and does facilitate multi process actions across planning and building. Staff cannot easily update basic data, such as add addresses after verification or continue to assess an application when the application is on hold. This is resulting in double or triple handling of development applications. A relevant authority should be able to efficiently complete all aspects of an assessment at one point, regardless of status of the application and should be given administrative control to change data in the DAP as required. There is significant inefficiency in administrative functions being undertaken only by PlanSA.
- The current DAP is too complicated for simple development applications. The DAP should be streamlined for simpler development applications and should allow authorities to concurrently assess planning consent, building consent, and issue development approval.
- Assessment timeframes do not accurately capture when a request for information has been made – the DAP should accurately measure the assessment time.
- The system does not have a robust document management system, the current approach is convoluted and complicated. A contemporary document management system should be adopted for the DAP to reduce the administrative burden for all users. This should include generating emails within the DAP, which is a standard expectation of a contemporary digital solution.
- Dashboards to monitor volumes of work are not working and cannot be readily relied upon. Dashboards should be provided to readily monitor and track development applications, without having to generate a PowerBI reports.
- Reporting function is confusing and not accurate. PowerBI Reporting should be simplified, accurate and relevant authorities should be given full access to all their data to generate bespoke reporting.
- A large number of submitted proposals are not progressing past the submit stage, as required information is not provided and this is contributing to unnecessary burden on the system. Submitted proposals, where required information has not been provided during verification, should be withdrawn by the system automatically after a certain period of time and applicants should relodge when ready to proceed.

Given the critical role of the DAP in the system, the Expert Panel is requested to **review the governance and resourcing that is necessary to sustain the DAP**. There appears to be an inherent limitation with the current governance model of PlanSA determining and progressing enhancements. While there have been many enhancements, acknowledging the efforts of the department to address what they can, there remain many more that are outstanding. As the current governance model requires all ideas to be funnelled through PlanSA and prioritisation of enhancements need to fit within the available resources & understanding of the issues by the department, the most common problems are the focus, not innovation.

The DAP should offer full Application Programming Interface (API) Based Product Integration (open data) so that authorities and other relevant stakeholders can move towards business to business transactions. This will facilitate innovation as it will incentivise authorities to evolve their business processes and the learning can be shared across all stakeholders. Enabling all stakeholders to shape direction and priorities of the core DAP functionality, together with the full API based Product Integration the DAP could realise its full potential as a digital platform.

Crown development applications should also be processed within the DAP as working between two systems is inefficient, overly complex and is likely to result in errors. It is also confusing for customers who do not understand why there are still two systems in place. Crown developments were due to be included in the DAP by mid-2022.

Verification

Unlike the previous requirement under Development Act, the Verification process under the PDI Act is much more resource intensive. The increased requirements are not equally placed on an applicant to submit a complete development application – the DAP does not prevent incomplete applications from being submitted. Therefore, all the expectation is placed on the relevant authority. Furthermore, the resource intensive process is exacerbated when an applicant provides a partial response to a request for information to form a complete application. This is double, triple handling of the application. The consequence is that greater attention is required on the more complex developments and simpler developments take longer to process.

The system also fails to account for the nuanced link between requesting from an applicant the full documentation for an application, when at a preliminary stage, it is apparent the development proposed will not be supported in that form. Providing relevant authorities the time to provide a preliminary guidance to an applicant early, will save the applicant time and money. This is particularly relevant for more complex development applications. Not providing advice about significant issues but seeking possibly expensive technical mandatory information only to then advise after lodgement has occurred that there are significant concerns does not build a constructive relationship and often leads to complaints about staff action.

The Expert Panel in invited to also consider that the data collected to form its initial perceptions of verification was over a period of extraordinary development activity as a result of government stimulus to facilitate construction activity during peak Covid-19. Some Councils experienced over a 30% increase in development applications in this period while at the same time many workplaces were required to adapt to significant changes, lock downs and loss of staff due to isolation rules. There were also many instances where new lots from approved land divisions were not created in the DAP and applications could not proceed past the verification stage. Further it is not uncommon for applicants to submit applications for new housing reliant on lots and roads that have not been approved in a land division and these may then need to wait longer before they can be verified and submitted. In this context, 84 percent of verifications within time is considered to be reasonable. The suggestion of penalty in the context of the environment at the time of the data collection is not considered reasonable. It is likely to lead to more refusals.

Moreover, it would also seem appropriate to explore the data from the DAP in more detail to determine if the applications that fell outside the 5 days were verified on day 6 or 7; or was this an issue for a particular application type or region; or how affected where these authorities by Covid-19; or was the timeframe due to the poor quality information submitted with the application. A more complete understanding of the issues behind the headline metric is warranted. Furthermore, the Expert Panel is encouraged to consider training for all participants in the industry, education, and DAP system solutions, ahead of imposing penalties on a sector that is facing the same resourcing challenges as other sectors.

The proposal within the *E-Planning System and the Plan SA website* paper to explore combined verification and assessment processes and to remove Building Consent verification for simpler applications has merit and warrants further consideration.

Local Policy

It is recommended the Expert Panel also give consideration to the inclusion of additional local policy in the Code. The announced changes to heritage and character to bring strong controls is welcomed and this initiative should be extended to consider other policy gaps / deficiencies in the Code that have been identified by various stakeholders.

Local Government Assessment Manager Forum

Appendix C Council Submission on Phase 3 Draft Code December 2020

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Master Planned Neighbourhood Zone	
Council raised concerns with the 2019 draft Code relating to a change of the existing Suburban Neighbourhood Zone and Residential Zone — Residential Policy Area 4 to the General Neighbourhood Zone.	It is recommended that a Minimum Site Area TNV and Minimum Frontage TNV be inserted into the Zone to appropriately guide development within Adelaide Plains based on current Development Plan provisions.
The 2020 draft Code now proposes to transition the existing residential areas predominately to the Master Planned Neighbourhood Zone. This zoning will apply to the Liberty & Eden land developments. A new Emerging Activity Centre Subzone is also proposed over the Liberty development. The proposed Master Planned Neighbourhood Zone does not suitably address the minimum site areas prescribed within the existing Mallala Development Plan. Emphasis is placed on broad statements rather than quantitative allotment sizes. The Zone currently does not use any Technical Numeric Variations (TNVs)	PO 11.1 / 11.2 / 11.3 – it is considered that the proposed Performance Outcomes do not suitably address the minimum site area and frontage requirements for residential development. As the majority of the area to the west of the existing railway line has not been developed and there is not an 'authorised' plan of division, there is concern that until this has occurred, the lack of site areas will create a high level of uncertainty for future development proposals.
to carry over existing Development Plan criteria, but rather references criteria contained within 'Building Envelope Plans' that can be created as part of these master planned areas. If a Building Envelope Plan does not exist, then standardised broad policies are provided.	
It is also recognised that the existing and planned infrastructure (power, water and waste water) have all been designed to accommodate a certain number of houses within the development area. The Two Wells Residential DPA of 2013 introduced this policy framework to ensure that the minimum site areas adequately cater for the overall dwelling and associated infrastructure demands.	

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Re	commendations	
A key component of the Master Planned Neighbourhood Zone and the transition from the existing Suburban Neighbourhood Zone and Residential Zone relies on appropriate criteria being contained within new POs and the proposed TNVs.		PDC 18 – A dwelling shoul ial flat buildings, an averag	d have a minimum site area e site area per dwelling) and n the following table:
	Dwelling Type	Minimum area (square metres)	Minimum frontage (metres)
	Detached (except where constructed boundary to boundary)	250 minimum	7
	Semi-detached	200 minimum	6
	Row dwelling and detached dwelling constructed boundary to boundary	125 minimum	5
	Group dwelling and/or Residential flat building	200 minimum	No minimum
	The Code does not suitably current Zone.	address the minimum site	areas prescribed within the
	Table 1 – Accepted Develop	oment	
	exception, so that a dwell Concept Plan 99 – Two We that are subject to interfac	ing is not an accepted de Ils clearly identifies two ar e with existing authorised	lay' should be applied as an velopment in certain areas eas within the concept plan land uses (shown as 'Buffer uffer to an intensive anima

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	keeping building associated with a poultry farm north of Tempy Road and a 300 metre buffer from an operational building/structures on the site of a grain storage and handling/packaging facility west of Port Wakefield Road.
	A Deed of Agreement was prepared between the former DPTI and Hickinbotham as it relates to the Liberty land development, with existing PDC and non-complying trigger the method in which the relevant authority was informed of this requirement. This matter requires further consideration as to how this many be transitioned into the Code. Council and Hikinbotham also have a Deed in place that relates to this development.
	PDC 24 within the current development plan states that:
	"Land division should not create more than 1500 allotments within the zone, until the new road access to Port Wakefield Road as indicated on Concept Plan Map Mal/7 – Two Wells has been constructed.
	This has also been reflected in the non-complying provisions:
	"Land division where the total number of allotments created in the zone exceeds 1500 -
	Except where a new road access onto Port Wakefield Road has been constructed in accordance with Concept Plan Map Mal/7 – Two Wells"
	These policies were inserted into the Zone to reflect the number of additional allotments that could be created as part of the Two Wells development area without the need to undertake significant upgrades to the Port Wakefield Road access. It is acknowledged that the Concept Plan 99 shows the new road access, however the Code should also include a provision to reinforce this intent.

Adelaide Plains Council Issues / Comments

Of primary concern within Adelaide Plains Council is that while the provisions of the Master Planned Neighbourhood Zone seek to limit retail within the zone, the Emerging Activity Centre sub-zone does not have the same limitations, in fact it has no retail floor area size limits. In the Two Wells setting this could result in a retail centre being located anywhere in the Liberty development in direct competition to the Two Wells Main Street. While the introduction of the Master Planned Neighbourhood Zone is broadly supported, any policy that allows a significant out of town retail centre for Two Wells is not supported as it is directly opposed to the existing policy in the Development Plan that seeks to locate large retail within the Town Centre.

This was a significant issue raised by the community and Council during the preparation of the Two Wells Residential DPA in 2013. The removal of this policy intent is considered to be a significant departure from the existing Development Plan provisions, is not supported by Council and requires amendment as a matter of high priority.

Adelaide Plains Council Recommendations

A new Gross Leasable Area TNV to ensure that a maximum gross leasable retail floor space is included within the Emerging Activity Centre Subzone. The creation of a Gross Leasable Area TNV with a maximum area of 500m² would reflect existing Objective 3 and PDC 21 of the Suburban Neighbourhood Zone (Mallala Development Plan) and ensure that any future development does not erode the role and function of the existing Two Wells Main Street (Town Centre).

Alternatively and in the event that the Commission does not support the above recommendation, the Emerging Activity Centre Subzone needs to be substantially reduced in size and not applied over the entire Master Planned Neighbourhood Zone.

PO 2.1 – Part (b) enables development to a height of 6 storeys or 22 metres. This is substantially higher than the current 4 storey maximum building height. It is recommended that Part (b) be reduced to 4 storeys to create greater consistency with existing Development Plan provisions and provide a more realistic expectation of the heights of buildings encouraged within activity centres.

New Performance Outcome - It is recommended that the Concept Plan TNV be inserted within the Emerging Activity Centre Subzone to ensure that the non-residential component of Concept Plan 99 are reinforced and the appropriate siting and future sizing of an activity centre is addressed.

Adelaide Plains Council Issues / Comments

Accepted pathway (no planning consent required) are proposed for new dwellings where they are consistent with an approved building envelope plan and retaining walls up to 1.5 metres in height (except where visible from a public road).

The parameters for the approval and use of a Building Envelope Plan (BEP) have only just been released to local government and there is still some uncertainty as to how this new feature of the planning system will operate. What is not clear is why this element of the system is being introduced as part of the introduction of the Code, which was initially expressed as a 'like for like' policy change, and not following the introduction of the Code.

Adelaide Plains Council Recommendations

Council requests clarity as to what has prompted the introduction of BEP's and Accepted Pathway changes to be included as part of the introduction of the Planning and Design Code, which was intended to be limited to like for like policy not major structural changes to assessment processes.

Fence and Retaining Wall Structure includes the following assessment criteria:

- The retaining wall retains a difference in ground levels not exceeding 1.5
 metres (measured from the lower of the 2 adjoining finished ground
 levels).
- The total combined height of the fence and retaining wall structure is less than 3.3 metres in height (measured from the lower of the 2 adjoining finished ground levels)
- The structure is located behind the building line of the associated dwelling and any dwelling on adjoining land.
- 4. The structure is not located on a secondary street boundary.
- The development will not be located within the extents of the River Murray 1956 Flood Level as delineated by the SA Property and Planning Atlas

It is considered that this a total combined height of the fence and retaining wall of less than 3.3 metres is too high to be considered as an Accepted Pathway. It is recommended that the 'Fence and Retaining Wall Structure' be removed from Table 1.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	Table 2 – Deemed-to-Satisfy Development Classification
	Carport, Dwelling (various types), Dwelling addition, Outbuilding and Verandah reference the Design General Development Provisions. Both Two Wells and Mallala are considered to be an 'urban' area and it is considered that these land uses should reference Design in Urban Areas General Development Provisions. (note Ancillary Accommodation references Design in Urban Areas)
	Detached dwelling – 'Interface Management Overlay' should be added in the Overlay column.
	Dwelling addition – should include reference to PO 1.1
	Table 3 – Performance Assessed Classification
	Carport, Dwellings (various types), Dwelling addition, Fence, Outbuilding, Retaining Wall and Verandah reference the Design General Development Provisions. Both Two Wells and Mallala are considered to be an 'urban' area and it is considered that these land uses should reference Design in Urban Areas General Development Provisions. (note Ancillary Accommodation references Design in Urban Areas)
	Table 4 – Restricted Development Classification
	There is only one land use included as restricted - a 'Shop' with three exclusions (less than 1000m², a restaurant or where located in an Activity Centre). Consistent with the recommendations for a number of suggested policy amendments to reference appropriate non-residential sized development, the proposed 1000m² is considered excessive and to give rise to a potential impact upon the existing retail areas contained within the main street of Two Wells.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	The shop exclusion should be reduced to match intended policy changes to the Emerging Activity Centre Sub-Zone.
Animal Husbandry Zone / Sub Zone	
The revised Code proposes to accommodate the existing Animal Husbandry Zone in the current Development Plan through a sub-zone within the Rural Living Zone. Council was opposed to this approach in the 2019 version of the Code and requested a new Animal Husbandry Zone be included in the Code, based on the Mallala Development Plan Animal	It is recommended that 'animal keeping', low intensity animal husbandry' and 'horse keeping' should be listed as classes of development to be exempt from notification, subject to criteria that large scale horse keeping or dog kennelling proposals will undergo public consultation. We note that the South Australian Standards and Guidelines for Breeding and
Husbandry Zone. This request was not supported by the State Planning Commission, and the sub-zone has been retained in the 2020 revision of	Trading Companion Animals defines a large facility as:
the Code. Despite this there should be scope for revising/upgrading the sub-zone provisions with more of the existing Mallala Development Plan policy	Large facility means a facility with six or more pregnant or lactating dogs and/or cats at any one time or a facility which holds 30 or more dogs and/or cats at any one time.*
being incorporated since this is a unique, one-off sub-zone created specifically to accommodate Adelaide Plains.	This could be a useful and common definition that could be used as a trigger for public notice.
It is recommend that a series of changes are made to the proposed sub- zone including addressing the fact that horse and dog keeping and kennelling are proposed as notifiable development. Because of the clear purpose of the zone e.g. Animal Husbandry, this is an unusual policy response.	Procedural Matters - Notification - 'animal keeping', 'horse keeping' and 'low intensity animal husbandry' be exempt from the notification process by being added to the class of development column as drafted in the revised version of the sub-zone, subject to a suitable tipping point being identified for larger scale applications to be publically notified.
	These land uses should also be added to the Notification section of the parent Rural Living Zone.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	Restricted Development - the 1,000sq m floor area threshold exclusion for a 'shop' is far too generous and the 2019 figure of 200m² should be reinserted.
	Proposed additions to the sub-zone prepared by Council, based on current Development Plan policy, are attached to this submission to provide a starting point for potential additional policy within the Code.
	* http://www.dogandcatboard.com.au/breeders-new-standards-and-guidelines/
Flooding	
Since the 2019 consultation on the Code, a new Flood Overlay has been introduced into the 2020 draft. This is to distinguish between areas of high/extreme flood risk and those that are exposed to a general risk. Whereas formerly, the Code had the Hazards (Flooding) Overlay to deal with all degrees of flooding risk, the revised Code now has a: • Hazard (Flooding) Overlay - covering high risk areas; and • Hazard (Flooding - General) Overlay - covering areas of general flooding	Introduce the Hazard (Flooding - General) Overlay into the classes of development column in all relevant zone Tables 1 (Accepted Development) and Tables 2 (DTS) where the Hazard (Flooding) Overlay is also referenced. Hazard (Flooding) Overlay - remove the DTS criteria in DTS/DPF 3.5 introduced into the 2020 Code (relating to carports and outbuildings) as being inappropriate in a high risk flood area and that the 300mm build-up requirement be rewritten as a Performance Outcome.
The current Mallala Development Plan expresses flood policy via the Hazards module in the General section of the Plan and through the local policy additions inserted in its Flooding sub-section. The flood hazard areas are referenced along with minimum floor levels for buildings, gully traps and filling and driveway levels. These areas are defined in the	Hazard (Flooding) Overlay - remove this DTS criteria in DTS/DPF 3.6 around post and wire fencing and allow all forms of fencing to be Performance Assessed.
Development Plan Overlay – Development Constraints series of maps. Development within the flood hazard risk areas shown in these maps is controlled through the flooding provisions referenced in the relevant	'Gully traps' to be referenced as part of the required 300mm build-up for buildings (which is current Development Plan policy)

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
zones and at the General level (as described above). Some development in the high risk area is classified as non-complying.	
	Hazard (Flooding - General) Overlay expanded to cover all land adjacent the high risk Overlay area.
	The loss of POs 1.2 and 1.3 in the Hazard (Flooding) Overlay relating to land division that were formerly in the 2019 version of the Code is significant and that these policies should be re-introduced to provide important control measures for assessing infrastructure implications of land division proposals.
It appears that within the Flooding General Overlay that habitable buildings, commercial and industrial buildings, and buildings used for animal keeping within this area may be subject to a 300mm build-up to be consistent with Code policy requirements, however depending on their physical location they may not indeed need to be elevated, resulting in	If a DTS fill level value is to be used then it needs to be placed also in the Hazard (Flooding - General) Overlay provisions to give clearer direction for development proposals.
potential additional and unwarranted costs to applicants/land owners.	DTS criteria in DTS/DPF 3.6 allowing for a post and wire fences is not appropriate
	A more detailed review of assessment pathways in flood prone areas to result in limited 'Deemed to Satisfy' and 'Accepted' development in flood prone areas.
	Within higher risk areas development should undergo a performance assessment pathway and ideally DTS criteria ought to be removed so that all development is performance assessed, specific examples of horse keeping and outbuildings were identified as part of the Code review.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Interface Management Overlay	
	Application of the Interface Management Overlay within 500 metres of the existing IWS Northern Baleful at Dublin (Dublin Landfill Facility). The 500 metre application of the Overlay should be taken from the allotment boundaries of the existing facility.
	The Interface Management Overlay provisions to apply to the assessment of 'dwelling' 'workers accommodation' and 'tourist accommodation' in the Rural Zone.
Recreation Zone / Mallala Racecourse	
Concerns were raised by Council in its response to the 2019 draft of the Code around the transition of the Mallala Racecourse Zone into the Recreation Zone as it did not sufficiently capture the intent of the existing	Council still does not support the transition of the existing Mallala Racecourse Zone and Light Industry Zone – Mallala Racetrack Policy Area 2 solely into the Recreation Zone within the Code.
zone within the Mallala Development Plan. Despite some changes to the Recreation Zone it is considered that this zone still does not adequately consider current Development Plan policy.	It is recommend that a new Motorsport Park Subzone (within the Recreation Zone) be created to accommodate the unique suite of policies within the Mallala Development Plan.
The existing Mallala Motorsport Zone and Light Industry Zone – Mallala Racetrack Policy Area contain a unique suite of policies that are not reflected in any other Development Plan across the State.	Council has prepared a draft sub-zone, based on current Development Plan provisions, to provide a starting point for potential additional policy within the Code.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Neighbourhood Zone	
The Neighbourhood Zone applies within the residential areas of the Two Wells and Mallala townships. The 2019 draft Code proposed to transition the entire Residential Zone to the General Neighbourhood Zone. Council raised concerns with this proposal and the 2020 draft Code proposes most of the existing Residential Zone to now be transitioned to the Neighbourhood Zone (excluding Policy Areas 6) The draft Neighbourhood Zone encourages very low density housing with low rise buildings, often with large outbuildings, easy access and parking for vehicles. Existing Development Plan criteria for minimum allotments sizes, buildings heights and site frontages are managed via TNVs. The Neighbourhood Zone provides suitable on-site waste water management criteria for areas that aren't or cannot be connected to a community waste water management scheme which is an important element for Adelaide Plains Council, particularly as it relates to Two Wells,	This zone is generally suitable for the residential areas within APC, subject to some amendments including frontage widths, setbacks and building heights to reflect current Development Plan policy. Review the zone boundary at the rear of both Daffodil Road and Magnolia Boulevard allotments. PO 10.1 – Part (e) refers to a maximum length of 11.0 metres on the boundary for 'residential ancillary buildings'. There appears to be differences in the Accepted and Deemed to Satisfy/Performance Assessed criteria for various types of residential ancillary buildings (carports/outbuildings/verandahs) Table 1 (Accepted Development) Carport – 11.0 metres Outbuilding – 11.5 metres Verandah – 11.5 metres Table 2 (Deemed to Satisfy) + Table 3 (Performance Assessed) Carport - References DTS 10.1 which is 11.0 metres Outbuilding - References DTS 10.1 which is 11.0 metres Verandah - References DTS 10.1 which is 11.0 metres Verandah - References DTS 10.1 which is 11.0 metres Verandah - References DTS 10.1 which is 11.0 metres

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	In addition it is questioned whether the community will consider 11.5m wall lengths of 3m or higher on common boundaries to be minor development. This policy approach required further consideration.
	PO 11.2 - The general intent of this PO is supported, however the same policy applies in both the Design (PO 13.2) and Design in Urban Areas General Development Provisions (PO 19.2). It is recommended that PO 11.2 be removed from each of the above mentioned zones and reference the Design in Urban Areas General Development Provision PO and DTS/DPF 19.1 (the townships of Two Wells and Mallala are considered to be an 'urban' area).
	Table 2 - Ancillary Accommodation/Detached dwelling/Dwelling addition/Semi- detached dwelling should include reference to PO 1.1
	Table 2 - Ancillary Accommodation / Carports, Dwellings and Outbuildings reference the Design General Development Provisions. The townships of Two Wells and Mallala are considered to be an 'urban' area and it is considered that these provisions should all to reference Design in Urban Areas General Development Provisions.
	Table 3 - Ancillary Accommodation should include reference to PO 1.1
	Table 3 - Ancillary Accommodation / Carports, Dwellings and Outbuildings reference the Design General Development Provisions. The townships of Two Wells and Mallala are considered to be an 'urban' area and it is considered that these provisions should all to reference Design in Urban Areas General Development Provisions.
	Table 4 – 'Shop' is restricted unless it satisfies one of two exclusions (less than 1000m2 or a restaurant). A shop or group of shops is currently non-complying within the Residential Zone and the change to a 1000m2 shop is considered excessive.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	A reduced floor area should be considered to ensure consistency with both the current the Development Plan criteria and the overall intent of the Neighbourhood Zone. Amend the Minimum Frontage TNV to reflect the current Residential Zone site
	area criteria.
	Amend the Minimum Building Heights (Metres) TNV from 9.0 metres to 8.0 metres to reflect the current Residential Zone building height criteria.
Residential Policy Area 6 – Mallala Development Plan	
It is proposed within the revised Code that the existing Residential Policy Area 6 transition to the General Neighbourhood Zone. The intent of the General Neighbourhood Zone is to encourage a range of dwelling types to increase housing diversity and supply. Other non-residential land uses, including small-scale offices and consulting rooms, and a range of community facilities, including education, recreation and community centres are also encouraged. Development is proposed to retain the existing scale of 1 and 2 storey building levels.	Council does not support the transition of existing Residential Zone (excluding Policy Area 6) to the General Neighbourhood Zone.
A review of the changes in policies between the 2019 draft Code and the 2020 draft Code was undertaken to determine if the General Neighbourhood Zone provides a suitable policy framework for the	

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Overall, the 2020 draft General Neighbourhood Zone is considered to be	It is recommend that the Residential Policy Area 6 transition to the Neighbourhood
an improvement from the 2019 consultation version and better reflects	Zone, subject to changes to the Neighbourhood Zone including the application of
the current Development Plan provisions. However, there are still a	both the Design (PO 13.2) and Design in Urban Areas General Development
number of differences that are of a concern if the Residential Policy Area	Provisions (PO 19.2).
were to transition to this zone. As part of the Commission's release of the	
2020 draft Code, the 'Summary of Post Consultation Amendments' (Nov	
2020) document states that the General Neighbourhood Zone should be	
applied where the existing Residential Code applies. The Residential Code	
currently does not apply to the area contained within the existing Policy Areas 6.	
The lack of TNV's and ability to bring existing minimum allotments sizes	
and frontages from the current Development Plan into the Code using the	
General Neighbourhood Zone, along with the ability to manage sites that	
are not connected to a CWMS system.	
Rural Horticulture Zone	
The Rural Horticulture Zone will cover a significant part of the southern	A TNV value for a minimum dwelling allotment size within each of the existing
area of the Council e.g. current Policy Areas 3 & Precinct 5 of the Primary	Horticulture Policy Area 3 (8ha) and Precinct 5 Horticulture (4ha) be spatially
Production Zone.	applied to the respective areas.
The Desired Outcomes for the zone (which remain unchanged from the	
2019 version of the Code). While the intent of the zone is considered	
suitable, it is recommended that some detailed policy changes occur.	

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	An additional Performance Outcome to be inserted into the zone to deal with stormwater runoff issues. An example of potential policy is outlined below:
	Stormwater runoff from buildings and hard surfaces captured and managed on- site through storage tanks and/or dams with a combined capacity to prevent direct water runoff onto adjoining public roads or properties.
	Council staff will liaise with the State Government planning staff to develop
	suitable policy wording during the finalisation of the Phase 3 Code.
	Table 2 DTS to be updated to reference new PO (and/or DTS) where applicable.
	The Hazard (Flooding - General) Overlay to be inserted into the classes of development column of zone Tables 1 and 2 wherever the Hazard (Flooding) Overlay applies.
	Restricted Development Table - the floor area exclusion size for a shop to revert back to the 2019 Code area of 250m².
	Inclusion of PO and DTS/DPF criteria relating to a front setback requirement for an office in both the Rural and the Rural Horticulture Zones, this existing absence appears to be an oversight.
	Notification Table - horticulture to be added to the class of development column (it is currently missing).

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	Horse keeping' and 'outbuilding' in Table 2 – both to be subject to the two flood Overlays and to not have the DTS pathway available.
Rural Living Zone	
The Rural Living Zone applies in five areas with the principal location being Two Wells/Lewiston. The areas are the same as outlined in the initial Phase 3 Code 2019 and reflect current Development Plan zoning. The Desired Outcome for the 2020 version of the zone (which remains largely unchanged from the 2019 version of the Code) is: A spacious and secluded residential lifestyle within semi-rural or seminatural environments, providing opportunities for a range of low-intensity rural activities and home-based business activities that complement that lifestyle choice. While the objective of the Rural Living Zone is considered suitable, it is recommended that a number of specific planning policy changes are made.	A TNV minimum frontage value of 30m be specified for lots within existing Precinct 3 - Two Wells Restricted Development - the 1,000m² floor area threshold exclusion for a 'shop' is far too large for a Rural Living Zone and the 2019 figure of 200m² should be reinserted. Table 1 - Accepted Development - reference made to the Hazard (Flooding - General) Overlay in addition to and in support of the Hazard (Flooding) Overlay where this is listed as an exception in the classes of development column. Table 2 - DTS - reference must be made to the Hazard (Flooding - General) Overlay in addition to and in support of the Hazard (Flooding) Overlay where this is listed as an exception in the classes of development column, and that both flood Overlays also apply to 'horse keeping' and to 'outbuilding'

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations		
	'Detached dwelling', 'dwelling addition' and 'ancillary accommodation' subject to the Hazard (Flooding - General) Overlay in addition to and in support of the Hazard (Flooding) Overlay where this is listed as an exception in the classes of development column in Table 2 - DTS, with the corresponding DTS 2.1 reference being removed accordingly (i.e. these forms of development become entirely Performance Assessed in relation to flood policy).		
Township Activity Centre Zone			
The Township Activity Centre Zone will now only apply to the Mallala Town Centre and not to the Two Wells Centre as was proposed in the 2019 version of the draft Code. This was a change that Council requested when commenting on the 2019 consultation version of the Code. The Township Activity Centre Zone contains appropriate planning policies that would enable a range of acceptable development outcomes to be achieved and has a much more comprehensive suite of policies than the current Mallala Development Plan. This will add greater value to the assessment process and provide clearer guidance to those who wish to develop in the centre subject to some additional planning policy around acceptable building heights.	Amendment to the draft Code to include additional planning policy around acceptable building heights in the Township Activity Centre Zone. TNV/Policy should outline a maximum height of 2 levels and 9m in height.		

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Township Main Street Zone	
The Township Main Street Zone will apply to the main street of Two Wells. It is currently zoned in Council's Development Plan as a Town Centre Zone together with Policy Area 5 Two Wells Town Centre. While the application of the Township Main Street Zone was requested by Council in its response to the 2019 draft Code, it is considered that the draft Zone provisions still do not adequately recognise or retain the significant policy contained in the current Mallala Development Plan.	Town Centre Sub-zone for Two Wells is applied to accommodate current specific and detailed Two Wells centre provisions. A draft sub-zone has been prepared and is attached as part of Council's submission to provide a starting point for potential additional policy within the Code. Inclusion of Concept Plan Mal/10 - Two Wells Town Centre Areas (as supplemented by and merged with Concept Plan Mal/1 - Recreation Two Wells.
It is recommended that a Town Centre Sub-zone for Two Wells is applied to accommodate current specific Two Wells centre provisions.	Council are prepared to engage an experienced mapping consultation to prepare a suitable revised Concept Plan to be introduced into the Code. TNV value prescribing a maximum building height spatially applied to all properties within the Zone.
	Insert the Hazard (Flooding - General) Overlay into the Code zone Tables 1 to 3 (in the classes of development column) wherever the Hazard (Flooding) Overlay is referenced in all cases.
	Hazards (Flooding - General) Overlay be amended by adding a further PO and DTS/DPF provision for a 'fence' similar to that already in the high risk flood Overlay

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	Hazard (Flooding - General) Overlay be specifically inserted into the Code zone
	Table 3 - Applicable Policies for Performance Assessed Development, in the
	Overlay column, to ensure that a 'fence' (as amended by the above
	recommendation), 'residential flat building' (otherwise there will be no levels
	specified for such development at all, a critical oversight) and 'retaining wall' are
	subject to this flood Overlay.
Interface between Land Uses (Rural Areas)	
Both the Rural Zone and Rural Horticulture Zone contain a suite of provisions that require the appropriate siting and design of sensitive land	Further review of interface provisions within the Rural Zone should be undertaken to strengthen the level of detailed planning policy that deals with rural interface
uses to ensure that they avoid adverse impacts upon adjoining rural activities.	issues, particularly between farming and horticulture activities. (Council staff are happy to be involved in the review process)
Within the 2020 Phase 3 Code there are interface policies contained within	
the Interface Between Land Uses General Development policies and the	
Rural Zone. Both Horticulture and Broad Acre Farming are envisaged land uses within the Rural Zone. While both are key land uses within this zone,	Rural Zone - DTS/DPF 3.1 criteria for 'Horticulture' is reinstated (or a similar criteria be inserted) to manage the interface between horticulture and farming activities.
they come with a level of complexity when considering how to manage interface issues between them. The 'Guide to the Draft Planning and	Recommended that the Rural Zone - DTS/DPF 12.1(d) be reinstated as 250m² to
Design Code – October 2019' states that the 'new rural based zones will contain policies about rural interface management'. It is considered that	reflect the 2019 draft Code criteria and provide a size more suitable for a Deemed to Satisfy assessment pathway.
the inclusion of Horticulture as a 'Deemed to Satisfy' use without	
appropriate and detailed interface provisions is not consistent with the	
consultation documentation supporting the intent of the Code.	
Council do not consider the current provisions within the Rural Zone are	
detailed enough to address the interface between rural land uses issue, in	
particular between broad acre farming and horticulture.	

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations		
	Recommend that Table 5 – Procedural Matters (Notification) in both the Rural Zone + Rural Horticulture Zone be amended to incorporate the following: • Reinstate 'function centres' as a requirement to undergo public notification. Should this exemption not be removed, that it is recommended that DTS/DPF 6.5 also be included as part of its notification requirement (this would limit the size to a maximum 75 persons) Recommend that Table 5 – Procedural Matters (Notification) in the Rural Zone be amended to incorporate the following: • 'Horticulture' exceptions should state – 'Horticulture that is unable to satisfy Rural Zone DTS/DPF 3.1 (d), (e) and (f)' • Reinstate a size limit for 'tourist accommodation' to ensure that larger forms of tourist accommodation require public notification.		
Coastal Areas			
The existing Coastal Conservation Zone and Rural Settlement Zone are proposed transition to the Conservation Zone and Rural Settlement Zone within the revised Phase 3 2020 Code. The Coastal Areas Overlay will contain coastal related development assessment provisions and a referral trigger to the Coastal Branch for any coastal development. In the 2019 draft Code it was also intended that a Dwelling Subzone be employed so that a similar suite of policies to those contained within the current Coastal Conservation Zone of the Mallala Development Plan could be included in the Code.	Reinstate the Dwelling Subzone to the Adelaide Plains Council area or include policy that requires new dwellings to undergo a performance assessed assessment with appropriate planning policy to guide environmental protection.		

Adelaide Plains Council Issues / Comments **Adelaide Plains Council Recommendations** It is understood that the Department for Environment and Water provided a submission on the 2019 draft Code and requested that the Dwelling Subzone should not apply to coastal land within the Adelaide Plains Council, as the area is ecologically sensitive (with parts located in the Adelaide International Bird Sanctuary National Park) and subject to coastal flooding. The Commission has removed the Dwelling Subzone from the Adelaide Plains Council area. The result of this change it that the construction of new dwellings will now be 'Restricted' development, not performance assessed development as was previously the case in the 2019. The replacement of an existing lawfully erected dwelling will however be an exclusion to the restricted pathway and ensure that a replacement dwelling will be performance assessed. The inclusion of new dwellings as a 'Restricted' development is a change from the current Development Plan provisions under which dwellings are classed as a merit form of development. Noting that the zone policies tend to only encourage replacement dwellings or dwelling additions, since the Coastal Conservation Zone's Objectives and PDCs do not actively encourage the construction of new dwellings in any event. Despite this the allocation of dwellings as Restricted seems a somewhat heavy handed policy response when a merit assessment with appropriate planning policy to guide environmental protection may be a more reasonable outcome for existing land owners within Adelaide Plains.

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations	
Industry/Light Industry		
	Reinstate a 20m setback from Port Wakefield Road that covers the existing Industry and Light Industry Zones as a Code setback (could potentially be achieved via a TNV minimum primary street setback value spatially applied to the affected properties).	

Attachment A – Revised Animal Husbandry Sub-Zone

Attachment B – Mallala Motorsport Park Sub-Zone

Attachment C – Two Wells Town Centre Sub-Zone

DTI:PlanSA Submissions

From: EA CEO <

Sent: Friday, 17 November 2023 9:45 AM

To: DTI:PlanSA Submissions
Cc: Murphy, Benjamin (DTI)

Subject: Greater Adelaide Regional Plan - Discussion Paper | City of Adelaide

Attachments: 20231116 - Letter - CEO to Chair State Planning Commission - Submission to GARP Discussion

Paper Consultation - 17 October 2023.pdf; Greater Adelaide Regional Plan - Discussion Paper -

City of Adelaide Submission - November 2023.PDF

Follow Up Flag: Follow up Flag Status: Completed

Some people who received this message don't often get email from

Learn why this is important

Dear Mr Holden

On behalf of Clare Mockler, CEO, and the City of Adelaide, please find attached a letter regarding the Greater Adelaide Regional Plan and Discussion Paper Submission for your attention.

Kind regards

Andrea

Andrea Mather

Executive Assistant to the Chief Executive Officer

Office of the CEO

Kaurna Country

Ground Floor 5 Pirie Street Adelaide, South Australia, 5000



cityofadelaide.com.au





Enquiries: Sarah Gilmour Reference: ACC2023/117529

16 November 2023

Craig Holden Chair State Planning Commission GPO Box 1815 ADELAIDE SA 5001

Via email: plansasubmissions@sa.gov.au

Kaurna Country

25 Pirie Street, Adelaide GPO Box 2252 Adelaide South Australia 5001

T +61 (08) 82037203 F +61 (08) 82037575 W cityofadelaide.com.au

ABN 20 903 762 572

Dear Mr Holden

Greater Adelaide Regional Plan - Discussion Paper

The Discussion Paper to inform the Greater Adelaide Regional Plan is an exciting opportunity for our city and region. Thank you for the opportunity to provide a response and for the briefing provided to Council in September 2023.

Council's submission was endorsed on 14 November 2023 and is enclosed.

City of Adelaide has a distinct role as the social, commercial, cultural, and civic capital and heart of South Australia. Council would like to see the city's primacy in the Greater Adelaide region reinforced in the Regional Plan.

City of Adelaide supports the 'Living Locally' theme and the four outcomes which seek to sustainably grow housing and the economy in the Greater Adelaide Region. Council is particularly pleased to see a focus on the Metropolitan Open Space System, at the core of which are the Adelaide Park Lands and Karrawirra Pari.

City of Adelaide's City Plan is being developed to provide clear and data driven guidance about how growth should be approached. Council is seeking City Plan to be adopted as a sub-regional plan to the Greater Adelaide Regional Plan, providing line-of-sight between the regional and capital city context.

We will continue to work closely with Planning and Land Use Services as we develop our respective planning frameworks.

To discuss our submission in more detail please contact Sarah Gilmour, As	ssociate I	Director
Park Lands, Policy and Sustainability on	or	

Yours sincerely

Clare Mockler

Chief Executive Officer

Enc – Greater Adelaide Regional Plan Discussion Paper – City of Adelaide Submission cc: Benjamin Murphy, Team Leader, Greater Adelaide Planning, Planning and Land Use Services:



Acknowledgement of Country

The City of Adelaide acknowledges that we are located on the traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past, present and emerging.

We recognise and respect their cultural heritage, beliefs and relationship with the land. We also extend that respect to visitors of other Aboriginal Language Groups and other First Nations.

City of Adelaide tampendi, ngadlu Kaurna yertangga banbabanbalyarnendi (inbarendi). Kaurna meyunna yaitya mattanya Womma Tarndanyako.

Parnako yailtya, parnuko tappa purruna, parnuko yerta ngadlu tampendi. Yellaka Kaurna meyunna itto yailtya, tappa purruna, yerta kuma burro martendi, burro warriappendi, burro tangka martulyaiendi.

Kumarta yaitya miyurna iyangka yalaka ngadlu tampinthi.





4 GREATER ADELAIDE REGIONAL PLAN - CITY OF ADELAIDE RESPONSE - NOVEMBER 2023

Introduction

The State Government released a Discussion Paper in August 2023 seeking feedback to inform the creation of a new Greater Adelaide Regional Plan.

This submission provides the City of Adelaide's key recommendations to guide the drafting of the Greater Adelaide Regional Plan.

The opportunities highlighted in this submission will help to strengthen the primacy of the city within the Greater Adelaide Region and enable coordinated and cost-effective delivery of key City of Adelaide recommendations, which are presented under the following focus areas:

- A Climate Resilient City
- Prioritise City Growth
- Recognise the Adelaide Park Lands and Karrawirra Parri
- A City of Neighbourhoods
- Better Infill Outcomes
- Better Connections to and around the CBD, and
- Respect Traditions, Heritage and Culture.





A Climate Resilient City

City Focus 2

Prioritise City Growth

City Focus 3

Recognise Adelaide Park Lands and Karrawirra Parri

City Focus 4

A City of Neighbourhoods

City Focus 5

Better Infill Outcomes

City Focus 6

Better Connections to and around the CBD

City Focus 7

Respect Traditions, Heritage & Culture

A Climate Resilient City

Relevant GARP Outcomes

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

Draft City of Adelaide Strategic Plan 2024 – 2028:

- Our Environment: Resilient, protected and sustainable
- · Our Economy: Growing, innovative and responsive
- Our Places: Interesting, purposeful and safe





City of Adelaide Priorities

High performing low carbon buildings

- High-performing buildings that are fully electrified, have high thermal efficiency and increased disclosure of energy performance at sale or transfer.
- Guidelines and incentives that help property owners retrofit existing buildings for a changing climate.
- Encouraging climate change mitigation and adaptation by Council and community.
- Making room for PV solar, community batteries, heat pumps and EV charging.

Adaptive reuse

 Exploring practical measures to increase adaptive reuse to capture the embodied energy in existing buildings.

Greener streets and Squares

- Increasing the extent of Urban Tree Canopy
 Overlay in the city and expanding the types
 of development it applies to to help mitigate
 urban heat island effect in key parts of the city.
- Increase investment in tree planting by increasing the offset payment for tree removal and its spatial application.
- Stronger evidence-based policy, identified at the strategic level and carried through to the statutory Code provisions, to enable green infrastructure and tree canopy to be retained.

Urban canopy and biodiversity

- Consider targets to convert roadways to blue/green infrastructure (trees, garden beds, bike lanes and supporting facilities and low emissions vehicles)
- Stronger incentives and mechanisms to reverse the decline of tree canopy and increase the extent of tree canopy in the City of Adelaide on both public and private land.
- Increase tree canopy cover throughout the city and increase the proportion of the city that has access to green open space within 400m walking distance.

Circular economy

- Support resource recovery and reuse in building and city design to contribute to a strong circular economy.
- Ensure adequate space for separation of food and organics waste streams to be provided in all apartment buildings.

- Integrated Climate Strategy
- Working with community and business networks
- City Housing (Adaptive Reuse) Initiative exploring re-purposing and reuse of existing buildings to support sustainability objectives including carbon capture, capitalising on existing capital investment, reducing landfill waste, and reducing consumption in construction.
- Urban design and projects to cool and green streets, including water sensitive urban design
- Comprehensive review of the Adelaide Park Lands Management Strategy
- Master Plans for the Adelaide Park Lands and the City Squares

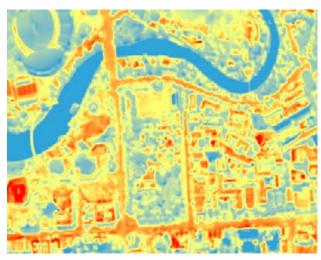
City of Adelaide Recommendations

The GARP should:

- Set specific measures to achieve the State's goal of net zero emissions by 2050, accompanied by a funding and implementation roadmap. These should include energy efficiency, connected communities, increased electrification and climate responsive buildings.
- Encourage greening and increase of tree canopy in the city to combat climate change, reduce the Urban Heat Island effect and enhance the benefits of living locally.
- Include strategic support to encourage adaptive reuse of existing buildings as a sustainable development option with immediate funding mechanisms to help fast track residential conversions that capture embodied energy in existing building stock.
- Include stronger strategic and evidence-based support for retaining urban tree canopy.
- Encourage use of the Planning and Development Fund for investment in new and upgraded open space, public realm, pocket parks, tree canopy and the Adelaide Park Lands.



Tree Canopy case study



Urban Heat mapping

Prioritise City Growth

Relevant GARP Outcomes

- ✓ A more equitable and socially cohesive place
- A strong economy built on smarter, cleaner, regenerative future
- A greater choice of housing in the right places



Draft City of Adelaide Strategic Plan 2024 – 2028:

• Our Economy: Growing, innovative and responsive



City of Adelaide Priorities

Maintain the primacy of the Adelaide **CBD**

Maintain the City of Adelaide's distinct role as the social, commercial, cultural and civic capital and heart of South Australia, supporting the growth in the wider metropolitan region, noting that this places increased importance on the CBD.

50,000 residents by 2036

- City of Adelaide's draft Strategic Plan targets a resident population of 50,000 by 2036 supported by a new Housing Strategy and City Plan.
- City Plan will help to determine where this growth could be accommodated and aims to provide certainty for both the resident and development community. State Government can support this growth through strategic infrastructure such as public transport. improved access to the Adelaide Park Lands and redevelopment of existing landholdings.
- Increase housing supply in the short term through adaptive reuse of existing buildings.
- Prioritise and advocate for the delivery of social housing and alternative housing models such as housing co-ops and ethical market based development to support affordable housing and a diverse community.

Economic growth and protection of existing clusters

- Deliver the Economic Development Strategy (in development) that is focussed on contemporary challenges such as climate change, global investment and talent attraction, and growing job opportunities for South Australians and businesses connected to their neighbourhoods.
- Connect, protect and support existing and emerging economic clusters within the city, including:
 - BioMed City, Lot Fourteen and University incubators
 - The important cultural, dining and entertainment experiences found in and around the Adelaide Central Markets, Rundle and Hindley Street which includes Adelaide's famed small bars and laneways
 - The North Terrace cultural boulevard which is home to some of the State's most important cultural and education and research institutions.
- Adequate investment and planning by all levels of government in quality social infrastructure for a growing Adelaide population.
- Support business growth opportunity and amenity in the public realm to ensure that businesses can settle in the city, knowing its location will attract emerging creatives and knowledge workers that businesses need to grow. Work with State Government to prioritise infill within the city and advocate for greater connectivity to the city, and Greater Metropolitan Adelaide and South Australia's Regions, through sustainable and efficient public transport.

- Adelaide Economic Development Agency
- Developing City Plan
- Encouraging more residential development in the city, including Market Arcade redevelopment
- Encouraging adaptive reuse as one initiative through the broader housing supply chain.
- Working with existing Main Streets to reinvigorate local business
- Collaborating with State Government on Lot Fourteen and BioMed City
- Drafting a new Housing Strategy setting ambitious targets to alleviate the housing crisis, provide key workers with accommodation

- choices and produce greater CBD vibrancy.
- Drafting a new Homelessness Strategy to address this complex multi-faceted issue from an evidence-based approach.
- Drafting a new Economic Development Strategy to ensure alignment between business growth, sustainable and climate responsive outcomes and growing city experiences.
- Social Infrastructure Assessment to plan for services and amenities a growing city community will need, also considering inner rim and corridor development, by collaborating with neighbouring Council partners.

City of Adelaide Recommendations

The GARP should:

- Adopt City of Adelaide's City Plan Adelaide 2036 as a sub-regional plan of the GARP.
- Recognise and support the primacy of the City of Adelaide as the social, commercial, cultural and civic heart of the region.
- Commit to a Light Rail extension to North Adelaide and into Prospect to support a residential and business growth corridor to O'Connell Street timed for redevelopment of the Women's and Children's Hospital.
- Support residential growth outcomes in the City of Adelaide to achieve 50,000 residents by 2036 through strategic infrastructure investment, including consideration of existing State Government landholdings.
- Recognise and reinforce the City of Adelaide as a key business growth location.
- Encourage innovative housing models to achieve housing and population diversity in the city.
- Support the delivery of social housing in the city.





Growth potential scenarios

Recognise Adelaide Park Lands and Karrawirra Parri

Relevant GARP Outcomes

- ✓ A greener, wilder and climate resilient environment
- ✓ A strong economy built on smarter, cleaner, regenerative future



Draft City of Adelaide Strategic Plan 2024 – 2028:

- Our Places: Interesting, purposeful and safe
- Our Environment: Resilient, protected and sustainable
- Our Community: Vibrant, connected and inclusive



City of Adelaide Priorities

Open Space Strategy and Adelaide Park Lands

- City of Adelaide supports the Commission's commitment to undertake a metropolitan open space study.
- Recognise the importance of the Adelaide
 Park Lands by placing it at the heart of the
 Metropolitan Open Space Scheme (MOSS),
 recognising its role as regional open space,
 natural and cultural values, and sporting and
 events infrastructure with adequate resourcing
 to perform that role.
- Funding for the management of the Adelaide Park Lands aligned to the growing city and inner metropolitan population, particularly for new corridor development.
- Adequate local scale open space for any inner rim development. Inner rim development should not rely solely on the Adelaide Park Lands.

Funding mechanisms

- Planning and Development Fund contributions for land divisions in adjacent Council areas within 500m of the Adelaide Park Lands should contribute to the Adelaide Park Lands Fund.
- Land division Open Space Contributions in the City of Adelaide should improve existing or create new open space.
- Encourage open space to be designed into larger developments through adjusting the Urban Canopy Offset Scheme to enable

payments per new dwelling rather than per site, and to ensure funds can be set aside for future well-located open space and recreational areas for the increasing residential population in the city.

National Heritage Listing and World Heritage Listing

- Ensure the National Heritage Listing of the Adelaide Park Lands and City Layout is recognised and identified in the GARP and future planning policy considers and protects National Heritage Listed values of the Adelaide Park Lands and City Layout.
- Ensure the GARP recognises and includes policies that support the World Heritage bid for Adelaide and its Rural Settlement landscapes.
- Recognise all levels of heritage including World, National, State and Local.

Adelaide Park Lands Management Strategy (APLMS) 2015 – 2025 update

 APLMS is currently being updated and should inform the metropolitan open space study.

Karrawirra Parri (River Torrens)

- Recognise the physical, cultural, environmental and strategic economic importance of Karrawirra Parri to the City of Adelaide, including its role as a key tourism attractor and visual centrepiece for the city.
- Support Water Sensitive Urban Design as a key mechanism to helping improve the health of Karrawirra Parri.



- Comprehensive review of the Adelaide Park Lands Management Strategy
- National Heritage Management Plan for the Adelaide Park Lands and City Layout to protect the National Heritage Values.

City of Adelaide Recommendations

The GARP should:

- Recognise the regional significance of the Adelaide Park Lands in any open space hierarchy or Metropolitan Open Space Scheme update.
- Recognise and support delivery of an updated Adelaide Park Lands Management Strategy.
- Encourage contributions to the Adelaide Park Lands Fund from adjacent development and intensifying land use.
- Recognise the National Heritage Listing and advocate for the World Heritage Listing of Adelaide and its Rural Settlement Landscapes.
- Recognise the cultural, environmental and strategic economic importance of Karrawirra Parri to the City of Adelaide, and Councils along its length.



A City of Neighbourhoods

Relevant GARP Outcomes

- ✓ A more equitable and socially-cohesive place
- ✓ A greater choice of housing in the right places



Draft City of Adelaide Strategic Plan 2024 - 2028:

- Our Community: Vibrant, connected and inclusive
- Our Places: Interesting, purposeful and safe
- · Our Economy: Growing, innovative and responsive



City of Adelaide Priorities

A city of neighbourhoods

 Ensure City of Adelaide is treasured for its diversity and the many neighbourhoods within it. Neighbourhoods can be entire blocks, single streets, vertical villages or centred around a Square such as Light Square and Hurtle Square. City Plan will identify these neighbourhoods spatially so that they can be celebrated and protected.

Identify and reinforce local identity

- Encourage a diversity of spaces and scales that support living, shopping and working locally.
- Support safe, healthy and connected centres where local character is celebrated and enhanced, and public realm is enhanced and protected.
- Encourage retention and adaptive reuse of buildings to activate and revitalise the city and create vibrant environments.

Workforce attraction and retention

- Improve workforce attraction and retention through creating a city that has amenity and lifestyle where people want to move to and stay.
- Focus on attracting international young professionals.

 Highlight the important role of Adelaide as a Capital City with access to high quality institutions, arts and culture, entertainment and education.

Climate resilience

- Climate resilience will reinforce Adelaide as a great place to live.
- At a street scale City of Adelaide is looking at ways to green the city which have dual benefits of reducing urban heat effects and creating opportunities for placemaking.

Diversity of housing and people

- Neighbourhoods and built form that welcomes and provides for the needs of many.
- Universal design in public realm and private development to ensure ageing in place and multi-generational housing.
- Providing for a mixture of multi-family, single occupancy and traditional housing.
- Recognising the role of pets in owner-occupied, rental and apartment buildings.

Social infrastructure

 Social infrastructure defined and provided according to benchmark thresholds including community centres, libraries, early childhood education and care, education and training, primary and community health, community gardens, art and culture, sport and recreation, to meet the needs of current and expected populations.

- Developing the City Plan
- Main Street Master Plans
- Urban Design Projects and upgrades in public realm
- Social Infrastructure Assessment to plan for services and amenities that a growing city community will need

City of Adelaide Recommendations

The GARP should:

- Provide for a nuanced approach to built form reflective of place identity, where streets
 are mixed use and mixed tenure to create diversity, vibrancy and a lifestyle where
 people want to move to and stay.
- Encourage funding for public realm upgrades in precincts experiencing uplift and residential growth.
- Adopt benchmarks and thresholds for new social infrastructure, such as schools and libraries as new denser communities emerge.







Better Infill Outcomes

Relevant GARP Outcomes

- ✓ A more equitable and socially-cohesive place
- A strong economy built on smarter, cleaner, regenerative future
- A greater choice of housing in the right places



Draft City of Adelaide Strategic Plan 2024 – 2028:

- Our Places: Interesting, purposeful and safe
- Our Economy: Growing, innovative and responsive



City of Adelaide Priorities

Greener corridors and boulevards

- City of Adelaide would like to see the Boulevard Zones reimagined to ensure they are genuinely creating a boulevard experience with greening, appropriate setbacks and strong linkages to the city and Adelaide Park Lands. Opportunities to do this include Greenhill Road, Fullarton Road, Robe Terrace and Port Road.
- Dwelling targets for inner rim Councils concerned about heritage and character preservation will likely see growth being focussed along corridors and boulevards. The additional inner rim population will increase movement into the city which should be supported by improved connections for active travel and improved public transport.

Catalyst sites

- City of Adelaide reinforces previous requests to remove catalyst sites from residential zones and seeks better interface policy in zones where they remain.
- City Plan methodology has identified city sites with development potential based on a number of factors including aircraft height limits, heritage adjacency and overshadowing. This methodology could be applied more broadly than the city.

New housing typologies and models

- While the 'missing middle' is often a term applied to inner metropolitan areas, the scale and form of Adelaide also makes it relevant here. Nuanced planning controls should encourage growth within the identified character of neighbourhoods.
- Thinking big and building smaller to increase diversity, reduce homelessness and ensure equity and diversity.
- Delivery of affordable housing that complements the pipeline of higher end apartments.

Adaptive reuse

Delivery of shop-top housing, adaptive reuse and zoning overlays that protects heritage fabric whilst encouraging regenerative developments.

Housing supply

- Influencing supply of housing as a way of improving affordability across the housing spectrum.
- Making appropriate interventions to foster and grow a new affordable rental asset class.

Innovation and sustainability

Exploring innovation in housing design, adaptive reuse of existing buildings, sustainability and housing models to improve affordability through cost of living while also providing environmental benefits through extending the life of housing.

- Focus on adaptive reuse residential projects
- Advocacy for effective connections to and from open space and social infrastructure for residents and inner suburbs
- Developing City Plan
- Preparing a new Housing Strategy

City of Adelaide Recommendations

The GARP should:

- Include a strategic plan for an improved active transport network to support expected growth along corridors and boulevards in inner rim Councils.
- Require better interface management and urban design outcomes for larger strategic infill sites. City Plan includes a 'development potential' methodology which could be applied to strategic infill sites.
- Revise catalyst site policies to better respond to development interface issues and facilitate an improved approval process for non-envisaged land uses.
- Demonstrate leadership in planning design excellence to achieve cost-effective climate mitigation and adaptation responses via infrastructure and built form in the city and region.
- Strengthen requirements for delivery of affordable housing for purchase or rent.
- Require the collection of developer contributions to fund local infrastructure.





CASE STUDY Thebarton Brewery Precinct (Source Draft Code Amendment)

There was no provision of local open space in the recent Code Amendment and access to the Adelaide Park Lands was relied upon. The Adelaide Park Lands should not be a substitute for quality local open space which provides recreation and place making opportunities for local communities.

Better Connections to and around the CBD

Relevant GARP Outcomes

- ✓ A Greener, wilder and climate resilient environment
- ✓ A more equitable and socially-cohesive place
- A strong economy built on smarter, cleaner, regenerative future



Draft City of Adelaide Strategic Plan 2024 – 2028:

- Our Community: Vibrant, connected and inclusive
- Our Places: Interesting, purposeful and safe



City of Adelaide Priorities

Focus on getting in and around the city

- Active transport is at our heart walking, cycling, and convenient public transport, as well as micro-mobility and e-bikes.
- Support increased uptake of electric vehicles, reducing noise and emissions in the city, including by delivering charging facilities.
- Creation of a green corridor from Robe Terrace to North Terrace to increase active transport between Adelaide and North Adelaide.

Active transport

- Active transportation opportunities that will play an increasing role in the health, wellbeing and climate responsiveness of the city and Greater Adelaide Region.
- Urban Design and public realm quality should encourage active transport as an easy choice, with multiple benefits including improved social cohesion, lower cost transportation, reduced carbon footprint and increased local shopping opportunities.

Enable effective regional and suburban connections to CBD

- An improved public transport network, with more opportunity for active transport.
- Respond to residential growth in suburbs adjoining the City of Adelaide and more people living and working in the city through coordinated and strategic transportation planning.
- Metropolitan scale consideration of improved access to the CBD (e.g. park and ride).
- Ensure city access and the city as a destination is a feature of any large-scale fixed-rail or lightrail initiatives introduced by Greater Adelaide Regional Plan.

Universal design and safety

- Accessible/inclusive considerations so that the city is accessible to all, and positions the City of Adelaide as a destination of choice for international conferences, study and tourism.
- Crime Prevention through Environmental Design should be embedded in all urban design initiatives.
- Embed a healthy streets approach to all policy development and project delivery.

- Updated Integrated Transport Plan (in development)
- City Plan
- Disability Access and Inclusion Plan

- Integrated Climate Strategy (in development)
- Electric Vehicle Study

City of Adelaide Recommendations

The GARP should:

- Establish the critical infrastructure nexus between population uplifts and need for better transport systems.
- Explore light rail and/or tram connections to North Adelaide, inner suburbs adjacent the City, and the Airport to support transit-centred growth.
- Create a terrace-to-terrace green corridor to connect North Terrace to Robe Terrace.
- Encourage built form and infrastructure in and connecting with the City of Adelaide that adopts best-practice accessibility (via application of Universal Design principles).
- Include funding mechanisms such as development fees in lieu of car parking for local and/ or state government to deliver coordinated active transport, electric vehicle infrastructure, separated bike lanes and footpaths or Universal Design improvements in existing and new main streets and neighbourhoods.
- Encourage a network of public electric vehicle charging locations and the inclusion of a benchmark ratio for private electric vehicle charging points in new developments.





Respect Traditions, Heritage and Culture

Relevant GARP Outcomes

- ✓ A more equitable and socially-cohesive place
- A greater choice of housing in the right places



Draft City of Adelaide Strategic Plan 2024 – 2028:

- Our Community: Vibrant, connected and inclusive
- Our Environment: Resilient, protected and sustainable
- Our Places: Interesting, purposeful and safe



City of Adelaide Priorities

Listen and connect with Kaurna heritage

- Begin all planning processes with a deep understanding of the history and cultural value of the place.
- Leading with a First Nations lens, weaving stories and understanding of Country in space and place to influence the urban design to create outcomes that are a genuine co-creation.
- Reconceive Adelaide from being a 'city in a park' to a 'city deeply immersed in Country'

We value built heritage

- National, State, and Local Heritages places, and Historic Area Overlays are recognised and valued in the City of Adelaide.
- Value the aesthetics and history of our built heritage so communities benefit from its contribution to culture, sustainability and the economy.



- 'Kaurna Voices' cultural mapping project
- Implementation of Our Future Heritage Strategy 2021 – 2036 and Action Plan
- City Housing (Adaptive Reuse) Initiative supporting retention and adaptive reuse of buildings with cultural and heritage value
- Implementation of Stretch Reconciliation Action Plan overseen by the Reconciliation Committee of Council
- Heritage Incentives Scheme that provides financial support for owners to undertake works to maintain heritage properties.

City of Adelaide Recommendations

The GARP should:

- Agree to a process with Traditional Owners which ensures all planning for public projects are led with a First Nations lens.
- Recognise and reinforce the National Heritage Values of the Adelaide Park Lands and City Layout.
- Reinforce the need for conservation of heritage values and the historic character of the City of Adelaide, including State Government funding for State Heritage.
- Encourage the creation of a single heritage statute to govern and protect State and Local Heritage, as described in City of Adelaide's position on Heritage Reform (June 2022).



Adelaide. Designed for Life.



DTI:PlanSA Submissions

From: Sarah Rose

Sent: Monday, 6 November 2023 2:57 PM

To: DTI:PlanSA Submissions
Cc: Kylie Weymouth

Subject: E2023198 - 3.65.016 - Greater Adelaide Regional Plan Discussion Paper

Attachments: Draft Letter of Submission - GARP Discussion Paper November 2023 - Final pdf

You don't often get email from

Learn why this is important

To whom it may concern

Please find attached the draft submission in response to the Greater Adelaide Regional Plan discussion paper.

Kind regards

Sarah Rose

Executive Assistant to the CEO Alexandrina Council

Phone: (08) 8555 7000

Email:

Website: alexandrina.sa.gov.au Consultation: mysay.alexandrina.sa.gov.au





Acknowledgement of Country

The Alexandrina Council region intersects with the traditional lands of the following Aboriginal Nations and Clan, Ngarrindjeri Kukabrak (Nation), Ramindjeri lakinyeri (Clan of the Ngarrindjeri Nation), Peramangk Kukabrak (Nation), Kauma Yerta (Country). In the spirit of reconciliation we acknowledge the Traditional Owners of this region and acknowledge their connections to the land, waters and community.

Please consider the environment do you really need to print this email?

This transmission is confidential. This email, including any attachments, is for the original addressees only. Any use, copying or disclosure by any other person is prohibited. If you have received this transmission in error, please notify us by email immediately and then destroy the message. Your cooperation is appreciated. The views expressed in this document are those of the author and not necessarily those of Alexandrina Council unless specifically stated



6 November 2023

Mr Craig Holden

Chair, State Planning Commission

Sent via email: plansasubmissions@sa.gov.au

Dear Mr Holden,

Greater Adelaide Regional Plan Discussion Paper

Alexandrina Council appreciates the opportunity to provide input during the preliminary stages of the preparation of a new Greater Adelaide Regional Plan (GARP).

We recognise the importance of this document in providing the framework for the future of Alexandrina and therefore the criticalness of getting it right.

Your message as the Commission Chair that the discussion is intended to '...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, our cultural and built heritage, our world class beaches and overall quality of life' (p 7) is welcomed.

It is also noted that the Discussion Paper invites input into two main questions: *How* should Greater Adelaide grow and *Where* should Greater Adelaide grow; with four key outcomes for the future of Greater Adelaide and a number of concepts for how these outcomes should be achieved.

Alexandrina Council agrees with and supports these outcomes and concepts and offers important feedback for consideration in preparing a Greater Adelaide Regional Plan that achieves these aspirational outcomes.

A Peri-urban Subregion

Nowhere embodies the characteristics identified in your message more than the Peri-urban region of Greater Adelaide. Council therefore respectfully requests that the significance of this region is elevated to (at minimum) a Peri-urban Subregion of Greater Adelaide. This will provide scope to fully recognise, support and reflect the area's uniqueness with overarching objectives and outcomes similar to previous iterations of the Greater Adelaide Regional Plan.

More detail regarding the importance of creating a Peri-urban Subregion is contained in Attachment 1.



Where should Greater Adelaide Grow? - Goolwa – an investigation area for housing growth for the 'Southern Spine'

Of significance to Alexandrina Council is the identification of Goolwa as an 'investigation area' for housing and employment growth.

Whilst it is acknowledged that this is a 'discussion' paper, it is unclear whether it is intended that Goolwa play a greater role in accommodating additional dwellings than already catered for within our existing 'town boundaries' (as per the current 30 Year Plan for Greater Adelaide' and Environment and Food Production Area boundary).

Land within the existing town boundary is likely to accommodate in the order of 6500 dwellings in the township of Goolwa alone, with further growth potential in other neighbouring townships (Middleton). The capacity within the existing 'town boundary' of Goolwa particularly, is already considered to provide for significant growth and is likely to alter the feel and attraction of Goolwa as a place to visit and for many, a place to live. Can Goolwa retain its 'Cittaslow' status with such significant growth?

In discussions with Planning and Land Use Services and in response to the Goolwa North Code Amendment, Council is currently preparing a revised 'Goolwa Growth Concept Plan. The revised Concept Plan considers options for growth in and around the township of Goolwa including whether there is any feasible or acceptable growth in nearby locations including Hindmarsh Island, Middleton and Port Elliot. Investigations include understanding community sentiment (what is it that makes this the place they want to live etc) as well as environmental and infrastructure constraints and opportunities.

This work will be completed in the new year and it is hoped will be considered as part of the drafting of the first draft GARP.

Infrastructure

The achievement of 'a more equitable and socially – cohesive place and a greater choice of housing in the right places' relies significantly on the provision of infrastructure, 'hard' and 'soft', in advance of need.

There are many existing challenges with providing infrastructure to cater for our existing population, particularly in some of our townships that play a seasonal tourism role, sometimes doubling their population in the high seasons.

SA Water does not service the majority of Alexandrina from a wastewater perspective. This means that alternative water and wastewater infrastructure is required.

Whilst a majority of Alexandrina Council's potable water comes from either the Myponga Reservoir or the River Murray, with Council and private entities responsible for provision in some townships, it is unknown what capacity these resources have to cater for both an increased population and a climate where significant periods of drought are anticipated.

Alexandrina Council operates and manages a community wastewater facility that currently has the capacity to only meet the existing development and connected infill. Significant and equitable (shared) **public** investment in wastewater infrastructure will be critical for a successful and sustainable population growth. The expansion the existing 30 Year Plan for Greater Adelaide and GARP does provide economy of scale opportunities to effectively and

Alexandrina Council Page 2 of 14



affordably allow access to essential services for the current and future Southern Fleurieu community.

Limited wastewater infrastructure has a direct impact on the ability to provide a greater choice of housing types to cater for a variety of different households. Opportunities exist within the Goolwa township to support the expansion of wastewater services to provide additional housing via urban infill. This could occur within the existing township but would still impact the downstream infrastructure capacities. This option may provide for more diverse housing opportunities at lower overall costs.

A more expansive explanation of the regional opportunities related to wastewater services are detailed in the addendums included in this correspondence.

Other 'soft' infrastructure such as medical, social and community infrastructure are also already under strain with our existing population.

Further discussion regarding the need for significant infrastructure investment is included in Attachment 1.

A **strong economy** built on a smarter, cleaner, regenerative future – Goolwa identified as an investigation area for employment growth

The significant contribution to South Australia's economy from the Peri-urban region through agriculture (food and wine production) and tourism and their unique challenges are not well recognised or supported in a Regional Plan that focusses more on housing growth and metropolitan issues. Protection of food production areas particularly for a growing population is crucial.

The Peri-urban area also contains other strategic resources such as important extractive industries and landfills that need to be identified and protected from encroachment, together with major economic investments that are driving growth and investment in the region.

In order to achieve the outcome of a *strong economy*, Alexandrina Council reinforces its advocacy for a Peri-urban Subregion of the Greater Adelaide Regional Plan for better protection of these unique and significant economic contributors.

Does the State have an 'Employment Strategy' for Goolwa? Whilst Council understands the supply and current (and to some extent) future demand for 'non-agricultural' 'productive economy' zoned land, with any significant increase in population, land will need to be set aside for additional 'employment' land such as retail, commercial, light industry and industry.

Given agriculture is the largest industry in 'inland' Alexandrina in terms of economic output, will the State help to set up related industries for example 'AgTech' businesses in the Alexandrina region to provide additional jobs for current and future populations?

The complete transformation of the Southern Fleurieu wastewater provision would also provide extensive opportunities in regional risk mitigation, circular economy transition, asset rationalisation, carbon reduction and energy production. This concept has been tabled by the Council's wastewater utility and provides a significant opportunity for State and Local Government, community and the environment.

A greener, wilder and climate resilient environment

Alexandrina Council has a proactive approach to climate resilience and greening. We were one of the first Council's to declare a Climate Emergency, have a Climate Emergency Action

Alexandrina Council Page 3 of 14



Plan, an Environment Action Plan, have undertaken a tree canopy study and are actively working to improve our tree canopy cover and improve our biodiversity. For a relatively small Council, we have two full time staff dedicated to this area. We therefore wholeheartedly support this outcome.

We also recognise the current shortfalls in on the ground policy that if not corrected, will not deliver this outcome. Discussion points are included in Attachment 1.

'Living Locally'

The Discussion Paper promotes a 'Living Locally' concept as a way of achieving the four outcomes proposed for Greater Adelaide's future. 'Living Locally' meaning locating housing, jobs and services closer together so people can meet most of their daily needs within a comfortable walk, ride or public transport journey from home 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.

This concept is supported, particularly for the main townships of Alexandrina, however it is considered to be a challenging outcome to achieve from a practical sense given the tyranny of distance from main transport hubs and unlikelihood of a full range of services being provided, given market requirements and funding costs being prohibitive.

In closing, the key concerns of Alexandrina Council are summarised as follows:

- The identification of Goolwa as an 'investigation area' for growth beyond our existing already significant 'town boundaries'.
- Coordination with the State Government's 20–Year State Infrastructure Strategy. The infrastructure challenges and deficiencies in servicing our existing population and the considerable investment required to cater for an unknown scale of future growth expected to be delivered in the township of Goolwa.
- A need to review Planning and Design Code policy in order to achieve the outcomes and aspirations the Discussion Paper identifies for the future Plan.
- The need to better recognise the unique contribution the Peri-urban regions make to the State's economy and to the features and characteristics that make the Greater Adelaide Region so special and the need to elevate the Peri-urban region.
- The need for an 'Employment Strategy' to support the identification of Goolwa as an area for employment growth.
- The need for a 'Food Security Strategy' and the Regional Plan's role in the identification and protection of Priority Primary Production Areas to cater for existing and expected future population.
- The need for water security and the protection of our water catchments.
- The need to consider the final outcomes of Council's Goolwa Growth Concept Plan

Alexandrina Council Page 4 of 14



Please refer to Attachment 1 and Attachment 2 for more detailed information.

Overall, Council commends the Commission for engaging early on this critical part of the planning system and for the aspirational outcomes and concepts that it seeks to achieve for the future of Greater Adelaide.

Council looks forward to further dialogue, and improved collaboration, particularly with the State's Infrastructure team prior to the release of any draft Greater Adelaide Regional Plan.

Yours sincerely



Nigel Morris

Chief Executive Officer

Alexandrina Council Page 5 of 14



ATTACHMENT 1: ALEXANDRINA COUNCIL - GARP DISCUSSION POINTS

A PERI-URBAN SUB-REGION

Discussion is intended to '...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, our cultural and built heritage, our world class beaches and overall quality of life' (p 7 Commission Chair's Message).

A Peri-urban Region or Subregion will better recognise the unique characteristics and challenges facing Peri-urban areas such as those in the Alexandrina Local Government Area that are summarised as follows:

89% of the Greater Adelaide region is outside of the urban footprint (in the Peri-urban region) and serves as a popular place to visit and live, provides substantive employment and wealth creation for the state, is a major tourist attraction and a major water catchment for metro Adelaide.

The Peri-urban region generates a disproportionate share of the total value of South Australian agricultural production.

Due to its high visitation level, populations within the Peri-urban region fluctuate greatly, which creates significant and unique issues for infrastructure and servicing planning, provision and funding.

In order to protect our premium food and wine region (ie a significant portion of the Peri-Urban region) Council and other Peri- urban Councils strongly advocate the need to identify Primary Production Priority Areas before any encroachments to the Environment and Food Production Area are considered.

With a significant expected increase in population, does the State have a Food Security Strategy? Is local food production being prioritised in order to meet both food security for our current and future population and also a reduction in our carbon footprint?

Whilst the Planning and Design Code has increased the ability for value adding and diversification, which is seen as positive, an absence of fine-grained policy and the lack of policy relating to relative scale of these 'value adds' presents certain risks associated with ongoing land use intensification and diversification and therefore land use conflict in our key food production areas. It is important to get the balance right. Will the importance of the role of the Peri-urban areas in agricultural production be reflected in the Regional Plan?

In respect to water security for our current and future proposed increases in population, is there appropriate recognition of the key role that the peri-urban region plays in containing major water catchments for the state? Has appropriate planning been undertaken, or the work that is being undertaken by SA Water intended to be reflected in the Regional Plan to ensure adequate provision of water in a predicted drier climate? Note, that with an expanded waste water treatment facility, Council may be in a position to provide alternative water supplies.

Existing Rural Living Zones typically found in the Peri-urban region also need better understanding as a legitimate housing choice, in terms of the trends and data influencing them. These matters need recognition at the Regional Plan level, proper investigation and data collation and analysis to inform possible changes to the Planning and Design Code.

Alexandrina Council Page 6 of 14

The Peri-urban area contains some of the State's most attractive and popular tourist drives, routes and destinations (as reflected in the Chair's message referenced above). Policies that once protected these routes have largely been lost through the transition to the Code. It is important that the Regional Plan recognises and seeks to protect these important elements of our tourism market so that Code Amendments and other strategic planning decisions can appropriately identify and protect scenic routes, scenic lookouts and the like which contribute to the landscape value and our overall tourism economy.

The Peri-urban area also contains other strategic resources such as important extractive industries and landfills that need to be identified and protected from encroachment.

The Regional Plan (or preferably the Peri-urban Subregional Plan) should identify the major economic investments that are driving growth and investment in the region and ensure their protection is prioritised.

Recommendation:

A Peri-urban Subregion Plan or section of the Greater Adelaide Regional Plan is created to protect the region's contribution in delivering a strong economy for the State.

WHERE SHOULD GREATER ADELAIDE GROW? - Goolwa – an investigation area for housing growth for the 'Southern Spine'

Infrastructure (soft and hard)

Whether Goolwa is expected to accommodate more growth than the existing town boundary already provides, does not remove the need for significant investment in infrastructure if the Paper's aspirations of achieving 'a more equitable and socially – cohesive place and a greater choice of housing in the 'right places' are to be realised.

It is agreed that the "right places," need to be identified to accommodate any growth. A major consideration in identifying the "right place" for growth must be a place where appropriate infrastructure is provided in advance of need, particularly for 'greenfield' locations. Provision of infrastructure ahead of need is critical to the success of growth.

Without the equitable provision of necessary infrastructure, be it be 'hard' or 'soft' infrastructure, not only will an 'equitable and socially cohesive place' not be realised, dependency on cars will also be entrenched which will be significantly counter-productive to the Commissions desire for a climate resilient future and the State's target of reaching net zero emissions by 2050.

Water and Wastewater

A majority of the Alexandrina Council area is not serviced by SA Water wastewater services. Wastewater services are owned and operated by the Council water utility business unit. This is a significant consideration due to issues relating to economies of scale and change implications.

As mentioned above, Council holds concerns about water security for our current and future proposed increases in population. We are hopeful that this basic essential need and the capacity to provide it has been factored into the State's population targets and that it will be

Alexandrina Council Page 7 of 14



a key determinant in identifying eventual growth areas in the new Regional Plan, particularly when we are faced with a predicted drier climate.

Wastewater

Although the GARP is early in its concept phase the required housing numbers to meet demand could be between ~5000 and 10,000 additional allotments within and around Goolwa (as well as expanded employment lands) that require the provision of essential services.

This level of growth would significantly change strategic infrastructure planning for wastewater within the Southern Fleurieu region. Effectively this quadruples the service footprint of the utility within the Goolwa scheme.

Despite the scale of the development, if captured early and collaboratively undertaken, could provide broader opportunities within the region.

The first recommendation regarding the GARP Discussion Paper would be to endorse and provide support for regional master planning for essential services over the existing and proposed footprint. This should highlight the most optimal wastewater supply chain infrastructure to service the area.

Council recommends the GARP advocates for State Government collaboration for preliminary design and costings of this infrastructure. This could then be used to inform policy for developer funded infrastructure via equitable contributions. This model would ensure that inaugural developers are not funding a disproportionate amount of infrastructure.



Figure 1: Concept - Wastewater Masterplan for proposed development and urban infill.

As depicted in Figure 1, these works could also look at feasibility options regarding the expansion of services into existing urban areas. The Goolwa Beach region is predominantly serviced by onsite wastewater systems and land parcels are large and subdivisions are

Alexandrina Council Page 8 of 14



possible, should this service become available. Economic feasibility of this opportunity may prove to be more financially viable than other broader investments.

Strategic decisions and opportunities should be addressed now as a matter of urgency. Council's water utility has highlighted opportunities and risks of growth within the region. Projected capital investment over the next 10 years for the Southern Fleurieu is in the order of \$8-15M. None of this investment will cater for the scale of the aforementioned development.

Development of this scale provides broader opportunities but these decisions need to be resourced and supported in the short-term before investment is made on existing strategic infrastructure plans. Advocacy should be made for immediate engagement with key stakeholders at State and Local levels as delays could result in 'sunk' asset costs, significantly impacting Council's ability to contribute.

Impact analysis of the existing 30 Year Plan for Greater Adelaide shows that the Goolwa wastewater treatment plant will not be able to cater for the demand. Expansion of process assets at the existing site is also deemed untenable due to footprint restrictions and future encroachment of residential development. This will drive asset rationalisation across the Southern Fleurieu which could provide additional opportunities for regional improvement and housing development. It is recommended that the Goolwa and Port Elliot WWTPs be decommissioned and a new facility that could cater for the 30 Year Plan for Greater Adelaide in the first instance and should it be required, the additional growth proposed by the GARP Discussion Paper proposal.

A purpose built facility could also cater for expansion of services into the Middleton district. This has been strictly opposed by the local Middleton community but with funding options and timing this may make the proposal more amenable. Especially if the cost of transitions is moved away from the customer. Contact should be made with key stakeholders in the Department of Health and EPA as advocates for pursing this regional masterplan approach to support transition of existing regional issues.

SA Water
Victor
Harbor

A13
Hardinas Gusee

Wetter Harbor

Figure 2: Wastewater Asset Rationalisation Concept Plan

Holistic planning of this scale would achieve a significant proportion of the GARP's and State Government strategic aspirations.

Alexandrina Council Page 9 of 14



Expansion into areas lacking a sewer service would dramatically reduce the localised environmental and health footprint normally associated with moving from decentralised to centralised sewer provisions.

Rationalising assets and building a modern wastewater treatment facility would leverage greater opportunities regionally. These include but are not limited to;

- Technical and professional employment (Employment)
- Industry and commercial expansion via recycled water supply (Economic Development & Employment)
- Repurposing of assets for reclaimed water storage and supply (Water Security)
- Position the service as a growth enabler not an impediment (Growth).
- Exploration of renewable and sustainable energy production (Economic Development & Environment).
- Opportunities for commercially viable product development (Economic Development & Environment)
- Sector collaboration to reduce regional environmental footprint (Circular Economy)
- Securing service affordability, access and sustainability (Community, Health & Environment)

It is imperative that clarity of direction is established early. It is incumbent on all stakeholders involved to ensure that opportunities are not lost and that critical infrastructure planning over the long term is optimised for the future state. This is the best methodology to reduce costs to customers, governments and developers.

The GARP should also advocate to reduce key risks and control critical areas of decision-making. Apart from loss of opportunity, two key risks exist that could significantly alter the regional outcomes and efficacy of the proposal.

Development should be controlled to ensure it is released closest to critical infrastructure epicentre and move outward. There are many precedents across the State of SA and beyond that show an uncontrolled release can make providing services untenable. This increases overheads significantly that unfairly tax the customer of the service provision.

Unfortunately, privately funded Code Amendments undermine planned and strategic roll out of infrastructure as they are able to occur in a piecemeal and non-sequential fashion.

The other is the water industry is regulated by ESCOSA under the presumption of a free market. Development of this scale introduces real-world risk of privatisation of essential services. The premise of a competitive market is that it will produce greater optimisation and thus a more affordable product. This is not Alexandrina Council's experience. The Council has historically absorbed the assets and services of three privately owned and operated wastewater businesses. All have been severely dilapidated and non-compliant. The commercial benefits of small scale water retail are clear but definitely not sustainable. It would be highly recommended that the GARP look at how regional and development policy could reduce exploitation of the current context.

Alexandrina Council Page 10 of 14



Transport and Roads

Whilst the State Government investment in improvements to the Victor Harbor Rd is acknowledged, the Goolwa Road (from the Victor Harbor Road to Alexandrina Rd) is considered unsuitable for the volume of traffic that is likely to result from the existing growth capacity within Goolwa and likely to require significant expenditure to accommodate existing growth capacity.

Preferable to that and more aligned with carbon neutral targets would be a significant investment in public transport between the Fleurieu Peninsula townships and beyond to employment and service infrastructure nodes, matched with an employment strategy for the Goolwa area to ensure the existing and current potential population have a chance of finding local employment.

Education, Medical and Social

Whilst not a service delivery area that Alexandrina is responsible for and therefore not experts in the field, our communities are telling us through our social and community planning networks that health services including the availability of GPs, allied health, aged care and emergency and other hospital services are significantly stretched with the demands of our existing population.

We also understand that there is a need for additional social and community services, with many aging, single person households, social services are a big need for our communities.

Recommendation

Necessary infrastructure needs to be equitably planned for and integrated, if not already in place, for growth locations to succeed.

The Government's 20-Year State Infrastructure Strategy Discussion Paper, which was recently made known to also be currently on consultation (and yet not widely publicised), needs to be fully integrated with the eventual outcomes of the Greater Adelaide Regional Plan in order to achieve many of the outcomes identified by the GARP Discussion Paper.

FOUR OUTCOMES IDENTIFIED FOR HOW SHOULD GREATER ADELAIDE GROW?

A greener, wilder and climate resilient environment

Alexandrina supports the Chair's recognition of the need to recognise and protect our natural environment and to use the planning system as a tool in tackling complex issues such as climate change and the net zero aspirations of the State.

Council however, holds real concerns about how the GARP will actually deliver a 'greener, wilder and more climate resilient environment' when there is a current lack of applicable policy to achieve this on the ground.

For example whilst the Urban Tree Canopy Overlay offers a tool for helping to achieve this goal, its application is very limited (it does not apply to any of the Master Planned Zones nor to many other residential zones and does not apply to any non-residential zones (Refer: Guide to the Planning and Design Code, June 2022 p 23 & 24). Where the Urban Tree

Alexandrina Council Page 11 of 14

Overlay or the 'landscaping' policies found in the 'Design' or Design in Urban Areas' General Modules policies do apply, in an assessment sense, they need to be considered as part of an overall assessment making it difficult to enforce/refuse an application where on balance, it may satisfy. In some instances, the corresponding 'Deemed to Satisfy' criteria does not include the landscaping component of the associated 'Performance Outcome'.

The absence of the Urban Tree Canopy Overlay to the 'Master Planned' zones is particularly concerning given that these are the zones typically (mandatorily) applied to greenfield sites.

Further, it is considered that the application of Significant Tree and Regulated Tree legislation and policy should be applied to all of Greater Adelaide in order to effectively achieve the statement on page 45 of the Paper: 'So, we need to value and protect trees, create more green spaces...and minimise the impact of development on areas with environmental value.' The application of Significant and Regulated Tree policy will provide protection to existing tree canopy that is not covered by the Native Vegetation Act 1991.

Recommendation:

To achieve the greener, outcome it is suggested that:

- Significant Tree and Regulated Tree legislation and policy should be applied to all of Greater Adelaide; and
- urban tree canopy and landscaping policy be rolled out more broadly; and
 - the status of this policy should be elevated to assume greater weight in an overall assessment.

Is it the intent of Practice Direction 2 to create mandatory conditions of development regarding the planting of trees associated with development? This is supported as a means of achieving this outcome.

In respect to *climate resilience*, the GARP 'Idea' of 'avoiding growth in Coastal Environments such as areas susceptible to inundation and coastal erosion' is supported (p 56). This needs to happen at the GARP level (ie not including such areas as areas for growth) and also at the Planning & Design Code level for already developed 'urban' areas, through appropriate policy and referrals to the Coast Protection Board.

Recommendation:

Given it's state-wide relevance, it is considered that a review of coastal policy and referrals should be undertaken by the Commission.

A **strong economy** built on a smarter, cleaner, regenerative future -Goolwa identified as an investigation area for **employment growth** -

Alexandrina Council Page 12 of 14



The significant contribution to South Australia's economy from the Peri-urban region through agriculture (food and wine production) and tourism and their unique challenges are not well recognised or supported in a Regional Plan that focusses more on housing growth and metropolitan issues.

In order to ensure a *strong economy*, the importance of the Peri-Urban subregion's contribution to the State's economy and the factors that facilitate this contribution need to be identified and protected at the Regional Plan level. These attributes include— remnant native vegetation, biodiversity, high quality landscapes and seascapes, intact 19th century heritage, productive rural landscapes with rich soils and reliable rainfall producing high quality niche produce and attracting visitors and tourists to a unique landscape.

In respect to Goolwa being identified as 'investigation area' for employment Growth, does the State have an 'Employment Strategy' relevant to Goolwa? Whilst Council understands the supply and current (and to some extent) future demand for 'non-agricultural' 'productive economy' zoned land, with any significant increase in population, land will be needed to be set aside for additional 'employment' land such as retail, commercial, light industry and industry.

Given agriculture is the largest industry in 'inland' Alexandrina in terms of economic output will the State help to set up related industries for example 'AgTech' businesses in the Alexandrina region to provide additional jobs for current and future populations?

Expectation for significant housing growth in a location that has a limited supply of jobs must be supported by a jobs growth strategy and the identification of suitable land for commercial, retail, light industry and industrial development.

Council has recently undertaken a 'Productive Economy -Land Demand and Supply Analysis' to understand our current and to some extent future needs. This is provided at Attachment 2 for your consideration to inform the future Regional Plan.

Recommendation:

That an Employment Strategy be developed in consultation with Regional Development Australia, Council and other relevant stakeholders (PIRSA) in order to identify future employment industries.

Alexandrina Council Page 13 of 14



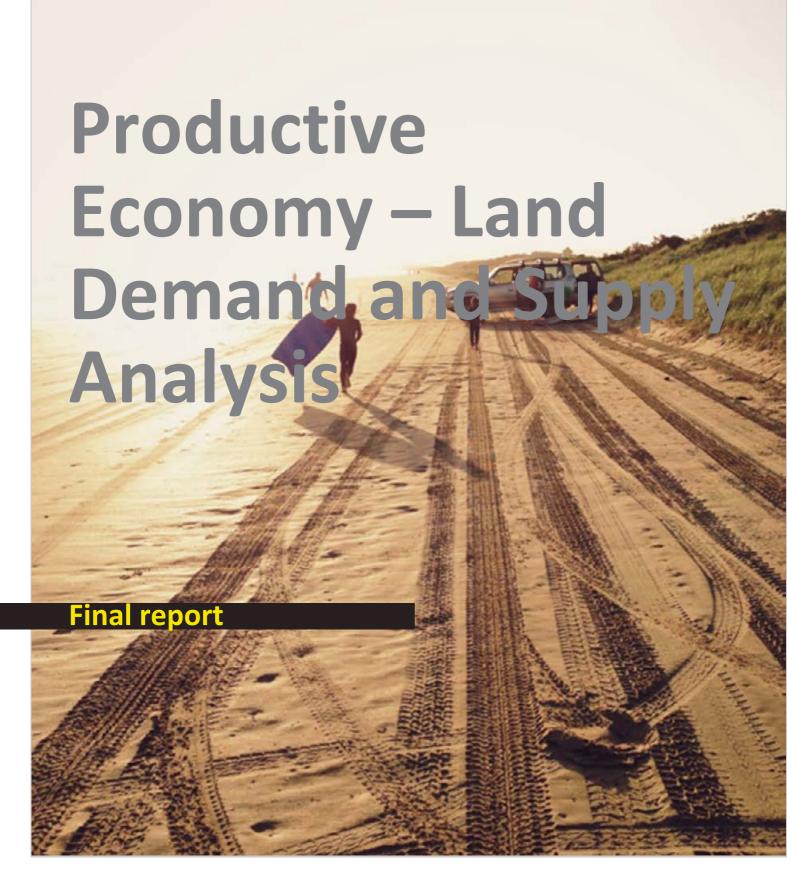
ATTACHMENT 2: Productive Economy – Land Demand and Supply Analysis

Alexandrina Council Page 14 of 14



Report to **Alexandrina Council**Advisory Services





Best for Project July 2023

We collaborate with our clients to solve complex problems. We are known for the subject matter expertise and creative solutions that we bring to any consulting challenge. We inject the right people, with the right skills, at the right time to unlock positive community outcomes.

© Copyright TSA Management. All rights reserved. No part of this document may be reproduced or transmitted, in any form or in by any means, without the express permission of TSA Management Pty Limited, unless specifically allowed for by the terms of a contractual agreement with TSA Management Pty Limited.



Contents

1.	Introduction	4
2.	Regional and township context	6
3.	Key trends and project context	. 27
4.	Supply of productive economy land	.34
5.	Employment land demand	.40
6.	Retail floor space demand	.50
7.	Demand and supply alignment	. 64
8.	Summary and strategic responses	.70
Appe	endix	.84



1. Introduction

1.1 Overview

TSA has been engaged by Alexandrina Council to develop a 'Productive Economy' Land Demand and Supply Analysis for the townships of Goolwa, Middleton, Mount Compass, Port Elliot and Strathalbyn. Council is interested in understanding how anticipated changes in the structure of the regional economy, combined with changes in local population and visitation to the region are likely to influence demand for industrial (i.e., employment) land, retail floor space, and commercial office floor space.

The purpose of the engagement is to assist Council to develop a stronger understanding of the demand for 'Productive Economy' land to inform strategic planning for townships, and (in particular) the impending State Government Regional Plan review process.

1.2 Productive Economy land definitions

As indicated above, TSA will look at demand for all categories of productive land in the five largest townships of Alexandrina Council. In carrying out the analysis, we will adopt the following land use categories:

1.2.1 Town centre

The term "town centre" refers to all land zoned within townships and set aside for retail and population services. In modelling demand and supply of land within these regions, we consider land currently within the following zoning classifications:

- Township Main Street (TMSZ), and
- Township Activity Centre (TACZ)

We recognise that currently services such as retail and hospitality are not exclusively located on TMSZ or TMAC lands. When considering the supply of town centre land within each area, we will take into consideration these existing services.

1.2.2 Employment lands

The term "employment lands" refers to land which accommodates (or is intended to accommodate) non-town centre uses. These precincts have in the past been referred to as 'industrial' precincts, reflecting the traditionally dominant role of manufacturing industries within them. As the role of manufacturing declines however, and as a greater mix of distinct uses emerges within these centres, the term *employment land* has become the preferred term. In modelling these uses, current land within the following zones is considered:

- Employment (EZ), and
- Strategic Employment (SEZ)

1.3 Report structure

This report comprises the following sections:

- Chapter 2, Regional and Township Context provides a summary of each of the five townships including key
 demographic and economic statistics, township profiles, a summary of township trade areas and an overview
 of the policy and strategic framework.
- Chapter 3, Key Trends and Project Context looks at key trends influencing the development of town centres and employment lands in Australia with specific reference to Alexandrina centres. It also looks at contextual factors including the national and global economies and the role of the circular economy.
- Chapter 4, Supply of Productive Economy Land summarises the current supply of employment land and retail floorspace across each of the five townships.
- Chapter 5, *Employment Land Demand* models demand for employment land across the five townships, showing how changes in the regional economy will translate to changes in demand for floor space over time.
- Chapter 6, Retail Floor Space Demand models demand for town centre floor space across the five townships, showing how changes in the population and visitation across each of the five townships translates to demand for floor space across key retail categories.
- Chapter 7, Demand and Supply Alignment aligns supply estimates and demand projections across productive
 economy land use types, estimating where there is over- and under-provision of land or floor space within each
 township across each of the land use types.
- Chapter 8, Summary and Strategic Reponses summarises the findings of previous chapters and provides recommended strategic responses for Council.

2. Regional and township context

This section will set out and describe the regional context that forms the background against which this report takes place, detailing key economic and demographic data relevant to the analysis. It will also set out and describe the five townships, describing the economic role and function of each within Alexandrina.

2.1 Regional context

For thousands of years before it had the name Alexandrina, the peoples of the Ngarrindjeri Nation saw the lands of the local area as defined by their relationship with the local waterways. This relationship has remained important and relevant throughout Alexandrina's history, and into the modern day. Towns, businesses, and local communities have grown on the fertile land around the mouth of the Murray and both tourists and locals enjoy the local beaches, rivers, and Lake Alexandrina.

Today, Alexandrina Council is a largely agricultural region located around 1 to 1.5 hours by vehicle to the southeast of Adelaide. It comprises substantial tracts of agricultural land, and a mix of medium and small townships. Its proximity to Adelaide has shaped the regional economy in a number of ways and is critical to the viability of small and large businesses across the region. Adelaide and its trade gateways provide excellent access to consumer markets for the region's dairy and wine producers and the beaches of Alexandrina's south coast townships are popular holiday locations for residents of the Adelaide metropolitan area (and increasingly tourists from outside of South Australia).

With the prospect of remote working likely to become increasingly popular (aided by changes in technology and working cultures), the post-COVID trend of professionals relocating to regional areas will continue, with Alexandrina's townships offering a genuine *tree* or *sea change* whilst remaining relatively proximate to the retail, service, cultural, and recreational opportunities available in the state capital.

Alexandrina is distinct from its neighbouring local council districts which all centre around larger single townships and cities

Mount Barker in the north is one of the fastest growing areas in South Australia, with significant greenfield development to the south of the existing township. For many residents of Alexandrina (and Strathalbyn in particular), Mount Barker (with a population of more than 21,000) is an important destination for the sorts of higher order retail and services not supportable in the smaller towns of Alexandrina. The role of Mount Barker as a major regional service centre is exemplified by the large share of employment and economic output linked to health care and social assistance, and retail trade.

To the northeast, **Murray Bridge** is the centre of a large farming area that connects local agricultural producers to the freight route between Adelaide and Melbourne. Although a large centre, it does not compete significantly with Alexandrina's centres, nor is it an important destination for Alexandrina residents. As well as servicing the needs of residents, it is also a major service centre for agricultural regions to the east, with primary and secondary industries in the agricultural supply chain important to its economy.

To the west, **Victor Harbor** has a similar economic structure to the coastal areas of Alexandrina, with an elderly resident population driving demand for a range of population services, and large numbers of visitors supporting the accommodation and hospitality businesses. As with Mount Barker, its economy is also focussed around servicing the needs of the surrounding population, with its economy dominated by the provision of health care services and retail.

In comparison to these surrounding LGAs, and to the rest of the state, **Alexandrina** has relatively low household incomes – largely a consequence of its more elderly (and non-working) population. In terms of socioeconomic status, the region performs above the South Australian average, indicating a relatively affluent population. Unemployment in the region is low, highlighting the tight local labour market, and underscoring the challenges to local businesses seeking to secure appropriately skilled workers.

-		

	Alexandrina (C)	Mount Barker (C)	Victor Harbor (C)	Murray Bridge (C)	South Australia	Regional South Australia
GRP (\$ million per annum)	\$844	\$1,330	\$576	\$1,072	\$1,536	\$549
Median Weekly Household Income	\$1,143	\$1,753	\$980	\$1,109	\$1,455	\$1,209
SEIFA-IRSAD score	949	1004	927	866	964	948
Unemployment ¹	3.4	3.7	4.2	5.5	4.7	4.9
Top three industries by productivity ²	Agriculture, Forestry and Fishing	1. Health Care and Social Assistance	1. Health Care and Social Assistance	1. Agriculture, Forestry and Fishing	1. Health Care and Social Assistance	1. Agriculture, Forestry and Fishing
	2. Health Care and Social Assistance 3. Construction	 Retail Trade Construction 	 Retail Trade Construction 	 Health Care and Social Assistance Manufacturing 	 Construction Financial and Insurance Services 	 Mining Health Care and Social Assistance
Top three industries by employment	1. Health Care and Social Assistance 2. Agriculture, Forestry and Fishing	1. Health Care and Social Assistance 2. Retail Trade	 Health Care and Social Assistance Retail Trade 	 Health Care and Social Assistance Retail Trade 	1. Health Care and Social Assistance 2. Retail Trade	1. Health Care and Social Assistance 2. Retail Trade
	3. Accommodation and Food Services	3. Accommodation and Food Services	3. Accommodation and Food Services	3. Agriculture, Forestry and Fishing	3. Education and Training	3. Education and Training

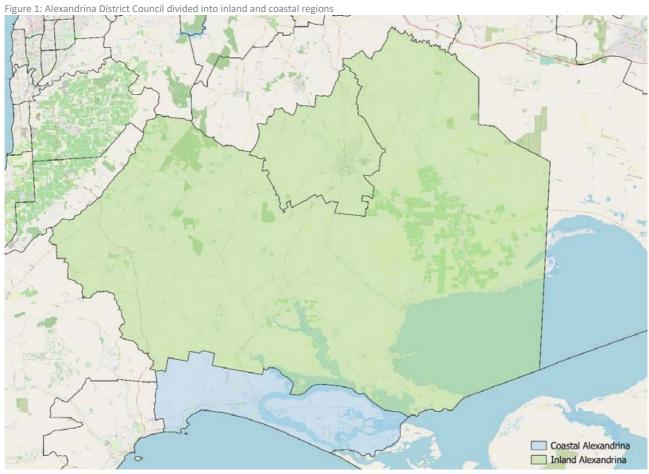
Source: Australian Bureau of Statistics, 2021 Census unless otherwise specified

 $^{^{}m 1}$ December 2022 Small Area Labour Markets smoothed unemployment rates sourced from Jobs and Skills Australia

² Productivity as defined by gross regional product of all industries in each LGA as modelled by TSA.

2.2 Municipal context

Alexandrina can be understood as an LGA which comprises two distinct subregions: coastal Alexandrina in the south, with a focus on tourism and the provision of population services; and inland Alexandrina in the centre and north of the LGA, where primary production is relatively dominant. Recognising the existence of these two distinct subregional economies is critical to understanding how economic opportunities (and land use requirements) differ spatially across Alexandrina's townships. These geographies are critical to our demand projections for employment land, which breaks down demand between the two.



Source: TSA Management

Agriculture is the largest industry in inland Alexandrina in terms of economic output. Strathalbyn and Mount Compass have grown as service centres for the surrounding agricultural regions. Whilst this remains the case, these towns – and Strathalbyn in particular – are increasingly popular locations for commuters and tree changers. As a result, township economies have evolved, with strong growth in population services such as healthcare, education, hospitality, and construction. In addition, the existence of primary industry in the region surrounding these townships also drives potential for value adding – in particular, food manufacturing and packaging.

In terms of economic output, the largest sectors in coastal Alexandrina are construction and health care, followed by retail trade, and hospitality. The towns of coastal Alexandrina exist as part of a string of settlements running eastwards from Goolwa to neighbouring Victor Harbor. As the largest city along this coastal region, Victor Harbor has the most extensive range of goods and services in the region and draws significant retail and service expenditures from residents of coastal Alexandrina. The economies of coastal Alexandrina towns are also shaped by seasonality of population and visitation. These townships have a large share of holiday homes which tend to sit empty during the



cooler months. The variation in expenditure over the course of a year represents a significant challenge for local businesses.

2.3 Township summary

Table 2. Key demographic data - key townships

	Goolwa	Middleton	Mount Compass	Port Elliot	Strathalbyn
Population	8,576	1,057	1,232	2,251	6,429
Growth rate	2.69%	2.68%	2.02%	1.42%	3.44%
Median age	63	49	40	61	47
% residents over 65	46.5%	26.8%	14.7%	45.0%	27.4%
% with long-term health condition	52.0%	39.2%	36.4%	49.5%	43.8%
% couple families with children	19.8%	34.1%	46.4%	24.4%	34.6%
% dwellings unoccupied	32.8%	62.1%	6.1%	38.4%	5.5%
% home ownership	72.3%	77.8%	87.3%	66.3%	75.7%
% renter households in housing stress	46.3%	37.5%	33.3%	42.1%	43.4%
% owner households in housing stress	16.6%	14.6%	12.9%	12.4%	13.9%
SEIFA score	907	990	968	951	947
Employment self- containment	43%	21%	19%	29%	32%
Employment self- sufficiency	56%	46%	40%	26%	51%
% with bachelor's degree and above	13.7%	24.6%	11.6%	21.2%	13.2%

Source: Australian Bureau of Statistics, Quick Stats

2.3.1 Demographic Summary

There are a few clear differences in the demographics of coastal Alexandrina and inland Alexandrina. Broadly speaking, residents of coastal Alexandrina are older, resulting in a higher proportion of long-term health conditions, particularly in the more established townships of Goolwa and Port Elliot. Coastal Alexandrina also has a much higher rate of unoccupied dwellings, indicating the popularity of the area as a location for holiday homes for people with a primary residence elsewhere. Altogether, these statistics point to the popularity of the area as a place to holiday or retire.

Contrastingly, the towns of inland Alexandrina have younger populations made up of a higher proportion of couples with children. Inland Alexandrina also has a lower rate of higher education than the coastal centres, reflecting their more regional economies based around agribusinesses that do not require many employees with higher education.

Population demographics



While Goolwa is the largest township and has the second fastest growth rate, it also has the highest proportion of older residents and the lowest proportion of families with children. Port Elliot follows these trends to a lesser extent, while Middleton shares more features with Strathalbyn and Mount Compass in that its population is younger and growing at a faster rate. Strathalbyn is the fastest growing township in the region over the past five years, likely impacted by its closer proximity to Adelaide and its outer satellite towns like Mount Barker.

Economic data

As a whole, Alexandrina's Socio-Economic Indexes for Areas (SEIFA) score and associated economic opportunity measures are reflective of the South Australian average, with some variation between the townships. Two areas where the district does have worse outcomes than the state-wide averages are the proportion of residents with higher education and the proportion of households in housing stress³.

Goolwa scores the lowest on the SEIFA index of relative advantage and disadvantage and has the highest proportions of households in housing stress. Port Elliot is the only township to have a home-ownership rate below the state-wide average, but those residents that do own their homes experience the lowest level of housing stress in Alexandrina. Home ownership is more common in inland Alexandrina and Middleton, with Mount Compass having the highest rates of ownership and lowest rates of renters in housing stress.

Inland Alexandrina scores higher on the SEIFA index, reflecting the productivity of the agriculture sector in Alexandrina. However, Middleton scores the highest of the district. This is likely reflective of Middleton's residents also having the highest rates of higher education, suggesting that it is a popular place of residence for skilled professionals that work in Goolwa, Port Elliot and Victor Harbor.

³ As defined as a household spending more than 30% of their income on rental or mortgage payments.



2.4 Township profiles

2.4.1 Goolwa

Overview of productive economy land

The map below shows productive economy land in the Goolwa township. The town's 'main street' is shown in red (Township Main Street), with the shopping centre shown in blue (Township Activity Centre). There are two employment precincts in the township — an Employment Zone to the east of the shopping centre, and a Strategic Employment Zone on the western fringe of the township.

The breakdown of leasable land within each of Goolwa's productive economy precincts is set out below:

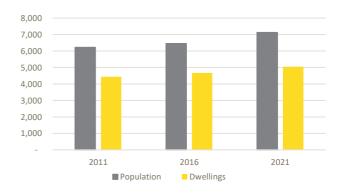


- Township main street/ main street 12,530 sqm of floor space (GLA⁴)
- Strategic employment 134,400 sqm of zoned land
- Employment 28,600 sqm of zoned land

Population and dwelling growth

The population of Goolwa⁵ has grown strongly in recent years, from around 6,200 in 2011 to 7,100 in 2021, an annual average growth rate (AAGR) of 1.4% over the period. The number of dwellings has grown at a similar rate (1.3%) over the same period.

Over the 2016 to 2021 period, the population grew at an annual rate of 2.0%, with the number of dwellings growing at 1.6% per annum.



Workforce

The figure below shows employed residents, and the local workforce broken down by industry sector. These figures reveal that:

- The most important sectors (in terms of employment) are health care and social assistance, retail trade and accommodation and food services.
- Employed residents are most likely to work in health care and social assistance, retail trade, and construction.
- There are not enough jobs in Goolwa to accommodate the local workforce, with deficits in all sectors apart from *public administration and safety* and *accommodation and food services*.

⁴ Gross Leasable Area

⁵ Represented by the suburbs of Goolwa, Goolwa North, Goolwa South and Goolwa Beach



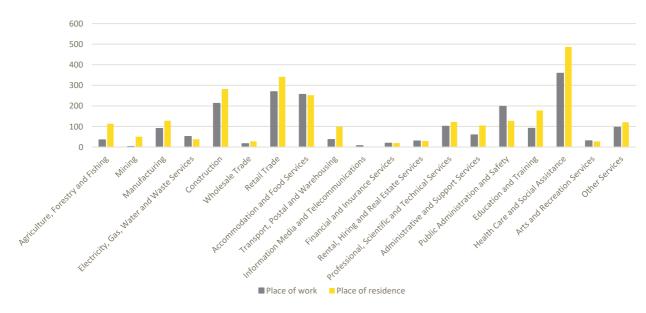


Figure 2. Local resident and local workers, breakdown by industry category (ANZSIC)

Source: TSA Management, ABS

Looking at the local workforce and working population by occupation, the data shows that:

- In net terms, there is an outflow of workers across all occupations, suggesting a lack of local jobs for workers residing in Goolwa across all skill/educational attainment levels.
- In percentage terms, the shortage of local jobs for machinery operators and drivers is most acute.
- The largest town in Alexandrina experiences a significant net outflow of workers, which highlights the subservient role it plays to large nearby centres of Victor Harbor, Mount Barker, and Adelaide.

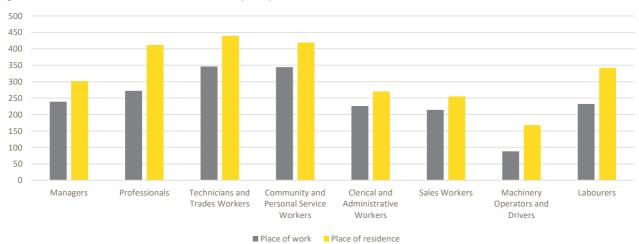


Figure 3. Local resident and local workers, breakdown by occupation

Source: TSA Management, ABS



2.4.2 Middleton

Overview of productive economy land

The map below shows productive economy land in the Middleton township. Two activity centres (Township Activity Centre), shown in blue, run along the sound side of Goolwa Road, separated by a caravan park.

The breakdown of leasable land within each of Middleton's productive economy precincts is set out below:

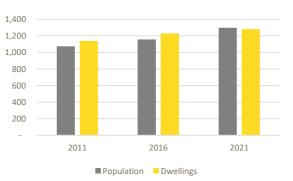
Township activity centre – 29,947sqm

Population and dwelling growth

Like Port Elliot, Middleton has had a slower growth rate over the past decade, growing from around 1,100 in 2011 to 1,300 in 2021, producing an AAGR of 1.9% over the period. The number of dwellings grew 1.2% per annum over the same period.

Population growth has accelerated more recently, with annual growth rates over the 2016 to 2021 period, of 2.3% for the population, but only 0.8% for dwellings. Middleton has an extremely high ratio of dwellings to residents, reflecting the abundance of holiday homes and private holiday rentals in the town.





Workforce

The figure below shows employed residents, and the local workforce broken down by industry sector. These figures reveal that:

- The most important sectors (in terms of employment) are accommodation and food services, and construction.
- Employed Middleton residents are most likely to work in *construction, health care and social assistance,* and *education and training.*
- There is also a significant deficit in jobs available in Middleton, with slightly more than double the number of
 resident workers as compared to local jobs. Despite this, there are small surpluses in available jobs in the
 agriculture, forestry and fishing and accommodation and food services sectors.



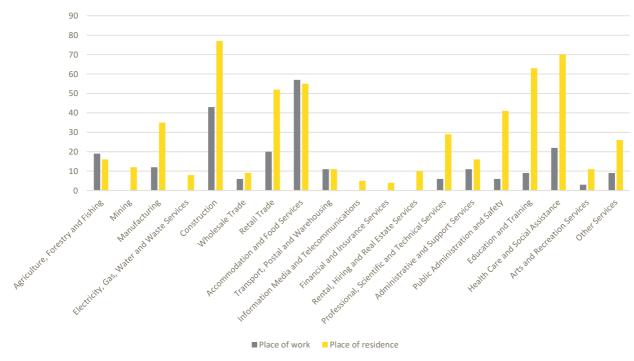


Figure 4. Local resident and local workers, breakdown by industry category (ANZSIC)

Source: TSA Management, ABS

Looking at the local workforce and working population by occupation, the data shows that:

- In net terms, there is an outflow of workers in every class of occupation.
- In percentage terms, the shortage of jobs for professionals is the most acute.
- Like Port Elliot, Middleton's overall outflow of workers across all occupation categories indicates that it functions less as an independent economy, but more as part of a broader regional economy. The surplus of employed professionals as compared to local jobs likely reflects the large number of residents employed in sectors such as Education and Training and Public Administration whose jobs are likely based in neighbouring Goolwa.

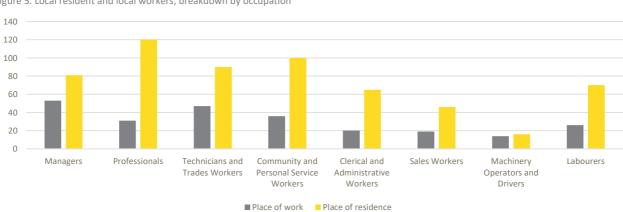


Figure 5. Local resident and local workers, breakdown by occupation

Source: TSA Management, ABS



2.4.3 Mount Compass

Overview of productive economy land

The map below shows productive economy land in the Mount Compass township. The town's main street area along Victor Harbor Road is shown in red (Township Main Street), and the employment land along Sand Hill Road is shown in purple (Employment Zone). The employment land is separated from the main township by a Rural Living Zone shown in yellow (not productive land).

The breakdown of leasable land within each of Mount Compass' productive economy precincts is set out below:

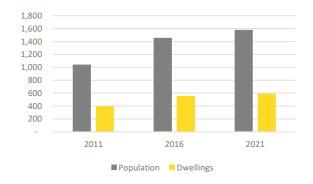
- Township main street 81,512sqm
- Employment 80,804sqm

Population and dwelling growth

Mount Compass has had the fastest growth rate of the townships considered over the past decade, growing from around 1,000 in 2011 to 1,500 in 2021, an AAGR of 4.3% over the period. The number of dwellings grew 4.1% per annum over the same period.

Most of this growth occurred between 2011 and 2016, with the annual growth rates over the 2016 to 2021 period, being 1.6% for the population, and 1.2% for dwellings. Mount Compass also has the lowest ratio of dwellings to population of the townships examined.





Workforce

The figure below shows employed residents, and the local workforce broken down by industry sector. These figures reveal that:

- The most important sectors (in terms of employment) are agriculture, forestry and fishing, education and training, and retail trade.
- Contrastingly, employed Mount Compass residents are most likely to work in *health care and social assistance, agriculture, forestry and fishing,* and *construction*.
- There is a significant deficit in jobs available in Mount Compass, with more than double the number of resident workers as compared to local jobs. Despite this, there is still a surplus in available jobs in the agriculture, forestry and fishing sector.



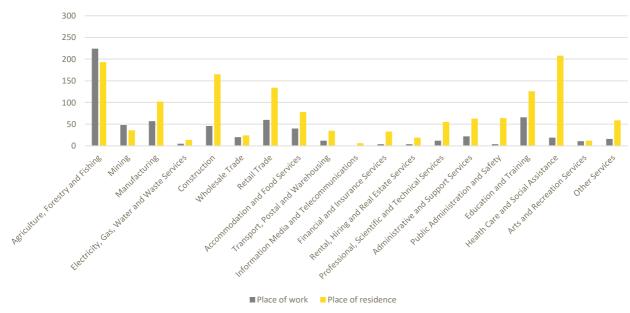


Figure 6. Local resident and local workers, breakdown by industry category (ANZSIC)

Source: TSA Management, ABS

Looking at the local workforce and working population by occupation, the data shows that:

- In net terms, there is an outflow of workers in every class of occupation.
- In percentage terms, the shortage of jobs for community and personal service workers is the most acute.
- Despite Mount Compass' relative remoteness compared to other townships, it has a very high number of workers who commute to other townships for work, even in lower-skilled occupation. This highlights the interconnectedness of the region both within Alexandrina and with larger nearby centres.

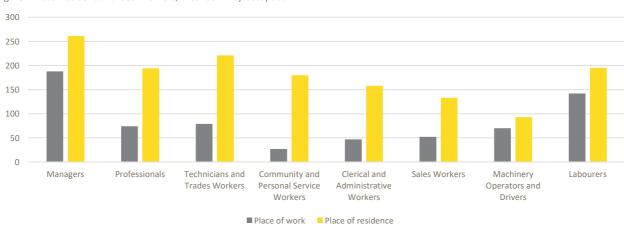


Figure 7. Local resident and local workers, breakdown by occupation

Source: TSA Management, ABS



2.4.4 Port Elliot

Overview of productive economy land

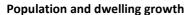
The map below shows productive economy land in the Port Elliot township.

The town's main commercial and retail centre is shown in red (Township Main Street), and the employment land is shown in purple.

The township's employment land precinct is bisected by Hill Street and divided into two zones – a Strategic Employment Zone (the darker purple) on the west side and Employment Zone (lighter purple) on the east.

The breakdown of leasable land within each of Port Elliot's productive economy precincts is set out below:

- Township main street 54,921sqm
- Strategic employment 92,411sqm
- Employment 126,359sqm



Port Elliot has had the slowest growth rate of the five regional townships over the past decade, growing from around 1,950 in 2011 to 2,250 in 2021, an AAGR of 1.4%. The number of dwellings has grown at a slower rate (0.6%) over the same period, suggesting a trend towards a more established population.

Over the 2016 to 2021 period, the population grew at an annual rate of 1.4%, and dwellings grew at 0.8% per annum.

2,500 2,000 1,500 1,000 500 2011 2016 2021 Population Dwellings

Workforce

The figure below shows employed residents, and the local workforce broken down by industry sector. These figures reveal that:

- The most important sectors (in terms of employment) are health care and social assistance, accommodation and food services, construction, and retail trade.
- Employed Port Elliot residents are most likely to work in *health care and social assistance, construction, retail trade, and accommodation and food services.*
- There is a small deficit in jobs available to the Port Elliot workforce overall, however there are multiple industries with significant surpluses in available jobs, including accommodation and food services, manufacturing, and education and training.



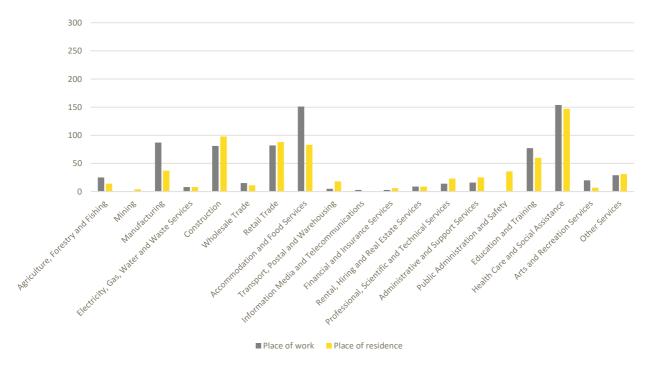


Figure 8. Local resident and local workers, breakdown by industry category (ANZSIC)

Source: TSA Management, ABS

Looking at the local workforce and working population by occupation, the data shows that:

- In net terms, there is an outflow of workers in total. However, there are multiple occupation classes with significant inflows into Port Elliot, including community and personal services workers, and tradespeople.
- After machinery operators, skilled professionals make up the second largest surplus of workers in Port Elliot.
- The disparities between Port Elliot's local workers and local jobs reflect that its economy and workforce functions as part of the larger settlement area running from Victor Harbor to Goolwa.

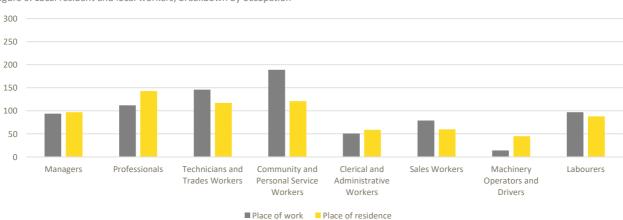


Figure 9. Local resident and local workers, breakdown by occupation

Source: TSA Management, ABS



2.4.5 Strathalbyn

Overview of productive economy land

The map below shows productive economy land in the Strathalbyn township. The town's central activity areas are shown in red (Township Main Street), and in blue (Township Activity Centre). A large employment zone exists to the south of the township, shown in purple. Most of this land is Strategic Employment Zone (the darker purple) with the northern corner being a regular Employment Zone (lighter purple). The employment land is bounded to the south by a Rural Living Zone (shown in yellow, not productive land).

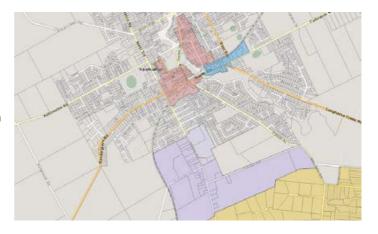
The breakdown of leasable land within each of Strathalbyn's productive economy precincts is set out below:

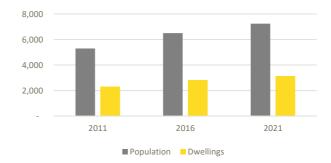
- Township main street 214,982sqm
- Township activity centre 56,108sqm
- Strategic employment 836,938sqm
- Employment 88,662sqm

Population and dwelling growth

Strathalbyn has been one of the fastest growing townships in Alexandrina in the past decade, growing from around 5,300 in 2011 to 7,300 in 2021, an AAGR of 3.2% over the period. The number of dwellings has grown at a similar rate (3.1%) over the same period.

This growth has slowed more recently. Over the 2016 to 2021 period, the population grew at an annual rate of 2.2%, with dwellings growing at 2.1% per annum.





Workforce

The figure below shows employed residents, and the local workforce broken down by industry sector. These figures reveal that:

- The most important sectors (in terms of employment) are health care and social assistance, education and training and retail trade.
- Employed residents are most likely to work in health care and social assistance, construction, and retail trade.
- There are not enough jobs in Strathalbyn to accommodate the local workforce, with deficits in all sectors apart from *education and training*.



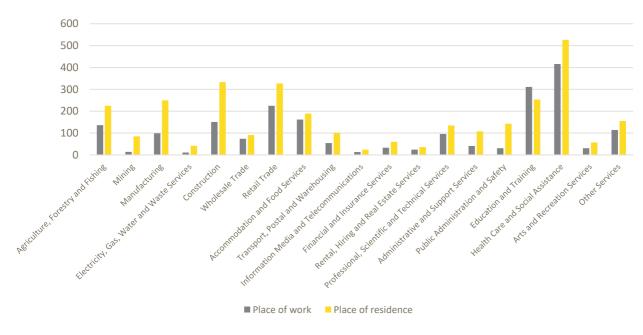


Figure 10. Local resident and local workers, breakdown by industry category (ANZSIC)

Source: TSA Management, ABS

Looking at the local workforce and working population by occupation, the data shows that:

- In net terms, there is outflow of workers across all occupations, suggesting a lack of local jobs for workers residing in Strathalbyn across all skill/educational attainment levels.
- In percentage terms, the shortage of local jobs for machinery operators and drivers is most acute.
- Strathalbyn has a significant net outflow of workers, particularly among machinery operators, labourers, and trades workers. This likely reflects Strathalbyn's relationship with the surrounding agricultural land as well as its proximity to Mount Barker and Adelaide.

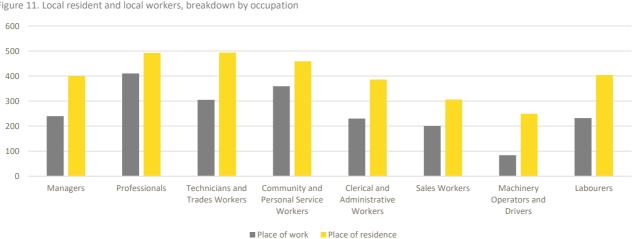


Figure 11. Local resident and local workers, breakdown by occupation

Source: TSA Management, ABS



2.5 Policy and strategy overview

It is important to understand the existing policy context which provides Council strategic direction. This section analyses relevant strategies and policies, their connection with this report and employment lands more broadly.

2.5.1 State/Regional Policy framework

There are several documents providing direction at a state and regional level. These documents have been prepared largely by South Australian Government agencies and include:

The State Planning Policies

The State Planning Policies (SPPs) are the highest order policies which define South Australia's planning priorities, goals and interests. They are the overarching policies that define the state's interests in land use planning and alignment. All designated instruments of the *Planning, Development and Infrastructure Act 2016* are required to align with the policies, objectives and principles prescribed by the relevant SPPs. There are 16 umbrella SPPs with accompanying polices. These are set out below.

Table 3. Summary of State Planning Policies

1. Integrated planning	5. Climate Change	9. Employment Lands	13. Coastal Environment
2. Design Quality	6. Housing Supply and Diversity	10. Key Resources	14. Water Security and Quality
3. Adaptive Reuse	7. Cultural Heritage	11. Strategic Transport Infrastructure	15. Natural Hazards
4. Biodiversity	8. Primary Industry	12. Energy	16. Emissions and Hazardous Activities.

SPP 9 Employment Lands is the most pertinent to this report. It contains 13 policies seeking to deliver the following objective:

Regional Plan – 30 Year Plan for Greater Adelaide

The 30 Year Plan for Greater Adelaide is the relevant regional plan. The Plan contains 14 policy themes with the most pertinent to this investigation being 'The economy and jobs'. The economy and job themes contain numerous policies which seek to protect and enhance South Australia's key industries and economy. These policies focus on primary production, tourism, mining and resources, manufacturing/defence, green industries, and employment land.

Individual policies which align with this report include:

- P56. Ensure there are suitable land supplies for the retail, commercial and industrial sectors.
- P73. Provide sufficient strategic employment land options with direct access to major freight routes to support activities that require separation from housing and other sensitive land uses.

The Plan was last updated in 2017 and is currently under review along with six other Regional Plans. A Discussion Paper for the Greater Adelaide Regional Plan is currently being drafted by the State Planning Commission and is anticipated to be released for engagement in the third quarter 2023.

[&]quot;To provide sufficient land supply for employment generating uses that supports economic growth and productivity."



Environment and Food Production Areas

The Environment and Food Production Areas (EFPAs) was introduced in April 2017 to protect rural areas and natural landscapes within specified areas in Greater Adelaide from urban encroachment.

Section 7 of the Planning, Development and Infrastructure Act 2016 (PDI Act 2016) highlights that any decision to permit urban encroachment within the EFPA, to accommodate housing or employment growth, should only occur if there is an inadequate provision within Greater Adelaide to support the principle of urban renewal and consolidation of existing urban areas and accommodate housing and employment growth over a period of at least 15 years.

In the instance Council requires additional employment land to support projected population and job growth and there is an insufficient supply outside the EFPA, a submission would need to be prepared to this effect and lodged through a review.

Review Scope

There is a statutory requirement to review the EFPA every five years under Section 7(9) (b) of the *PDI Act 2016*. The *PDI Act 2016* outlines the process for any variation to the EFPA, noting that boundaries may only be varied by the Commission under certain circumstances.

These circumstances are referred to as the 'Three Point Test' and effectively mean that if the Commission is satisfied that there is capacity to accommodate a 15-year land supply within Greater Adelaide then the EFPA boundary should not be altered other than to correct an anomaly. This is an extremely strict test and arguably does not take account of local differences in land supply. The tests are set out under section 7(3) of the *PDI Act 2016* as follows:

If the Commission is satisfied, that:

Test 1: an area or areas within Greater Adelaide outside environment and food production areas are unable to support the principle of urban renewal and consolidation of existing urban areas; and

Test 2: adequate provision cannot be made within Greater Adelaide outside environment and food production areas to accommodate housing and employment growth over the longer term (being at least a 15-year period); or

Test 3: that the variation is trivial in nature and will address a recognised anomaly.

The Regional Blueprint – Edition 3 September 2022

Produced annually by Regional Development South Australia, the regional blueprint seeks to drive regional economic success by way of promoting key strengths, priorities and opportunities in each of the regions. The Alexandrina Council is captured within the Adelaide Hills, Fleurieu and Kangaroo Island region, where the following six key priorities have been flagged:

- 1. Well planned and managed regional population growth with well serviced communities.
- 2. Healthy regional communities enjoying a safe active lifestyle with high levels of amenity and wellbeing.
- 3. Well-connected regional communities freely accessing services, social opportunities, jobs and commercial markets.
- 4. Highly skilled, highly participatory regional work force matched to the needs of regional industry and business.
- 5. More regional jobs for regional residents with less commuting leading to a greater contribution by the region's workforce to the regional economy.
- 6. Strong economic growth in the region driven by servicing the growing population and leveraging our comparative advantage with a special focus on industries with the potential to increase exports.



Priority five is of relevance to this report, noting its desire to support local workers and assist them in contributing to their respective economies, further avoid travelling excessive distances for work.

Strategic Regional Plan - Adelaide Hills, Fleurieu and Kangaroo Island 2022-2025

Prepared by Regional Development Australia – Adelaide Hills, Fleurieu and Kangaroo Island, this plan provides the region with a reference economic development strategy. The plan contains three strategic priorities, being:

- 1. Growing Regional Productivity
- 2. Enhancing Regional Innovation and Preparedness
- 3. Strengthening our most Competitive Industry Sectors

Strategic priority three, 'Strengthening our most Competitive Industry Sectors' is considered the most pertinent to this analysis, as it specifically highlights manufacturing, tourism and agriculture as key sectors to be strengthened. The strategic priority for manufacturing is as follows:

• Nurturing the region's largest and/or fastest growing manufacturing sectors, including food and beverage, machinery and chemical production manufacturing.

Ensuring there is an appropriate supply of employment land available to support the region's most productive industry sectors is vital to the success of this plan.

2.5.2 Local policy framework

A2040: Liveable. Green. Connected

A2040 is Council's highest order strategy. This document identifies five key action areas:

- 1. Climate Response
- 2. Appropriate Growth
- 3. Community Inclusion
- 4. Transport Connections
- 5. Environmental innovation

Each action area has five supporting activities and measures for the community's aspirations to be more Liveable, Green and Connected. Of the various strategies outlined in the A2040 plan the following are considered the most pertinent to the subject analysis:

- Attract and retain younger residents to live, work and play in Alexandrina
- Leverage Business Alexandrina to increase opportunities to co-design innovative solutions for industry
- Support local industry to connect, explore and pilot new initiatives.

Economic Development Strategy 2022-2027

Adopted in 2021, Council's Economic Development Strategy draws from an idea of 'regenerative' economic development. The document was developed to guide the Community Strategic Plan A2040's, and to address the community's desire to see sustainable growth whilst respecting the community's heritage and environment. There are several actions in this strategy directly linking to this project, including:

- "Mapping the commercial tenant mix and taking note of Council buildings in each town to identify gaps
- Promoting the region's regeneration goals to attract like-minded residents and businesses.
- Develop deep understanding of key local industries



- Use available levers for development, including business training and networking events Maintain up-to-date economic development information/data
- Support the development of key local industries"

The subject analysis is helping to deliver the actions sought by Council's Economic Development Strategy.

Making Sense of Goolwa's Growth Opportunities - GO 2030 - 2009

This document is described as a proactive plan to guide urban growth in Goolwa. The document was prepared in light of projections flagging Goolwa was to benefit from strong growth in population, tourism and local industry.

The Goolwa Structure Plan prepared as part of this project is conceptual in nature and whilst it identifies an urban boundary, it doesn't specifically identify a future employment precinct. From a commercial perspective, the plan largely focuses on the existing commercial precinct and its role in supporting the main street. The following goal and actions from the plan are considered the most pertinent to this analysis:

Goal (Economic):

• Goolwa's commercial precinct supports the character and role of the main street

Actions:

- Develop a guiding strategy that identifies the kinds of commercial and retail opportunities that are encouraged to locate in the main street and beyond in the commercial precinct.
- Strongly encourage future major retailers, discount department stores and food chains to locate in the Commercial Precinct. The preferable location is adjacent to the main street and connected to the main street through malls, pathways and plantings. An alternative but less preferable location is the South Goolwa Shopping Centre.

Goolwa North Enquiry by Design Workshop - Outcomes Report - December 2016

In 2016 following the development of the 'Growth Opportunities' strategy, Council went on to create a subsequent strategic report titled "Goolwa North Enquiry by Design Workshop – Outcomes Report".

This outcome report summarises the findings and recommendations from a collaborative workshop which sought to review the directions set by the GO 2030 report and prepare a more detailed Masterplan to guide the future growth of Goolwa North.

The Masterplan produced identifies the road network which will provide the framework for future urban growth in Goolwa North. It also identifies the general location of facilities and services for the growth area including education, health, retail, employment and recreation. Further, it illustrates a potential stormwater management system.

The detailed master plan identified land between Kessell and Port Elliot Road to zone to employment lands. This land is currently captured within the Strategic Employment and Deferred Urban Zones under the Planning and Design Code.

Goolwa North Growth Area Development Plan Amendment - May 2020

Following Council's adoption of the Goolwa North Master Plan in 2016, Council proceeded with the development of the Goolwa North Growth Area Development Plan Amendment.

In summary the Development Plan Amendment sought to reflect the master plan into the now superseded Development Plan. The rezoning sought to implement the following:

- Rezone of the area affected from Primary Production Zone to a Suburban Neighbourhood Zone and Deferred
 Urban Zone
- Introduce amended maps and Desired Character Statement
- Introduction of a new Concept Plan to demonstrate:



- o The location and extent of non-residential areas
- o The location and extent of open space and recreation facilities
- The provision of staging and essential infrastructure

Ongoing master planning for Goolwa (in development)

Council is currently undertaking investigations and community engagement to prepare an updated concept plan and more comprehensive master plan to identify appropriate growth areas within and around the township of Goolwa which may impact on population growth and land availability. Notwithstanding that the consideration of land within the urban growth boundary as identified by the Regional Plan remains relevant to this review which is intended to have a 30-year timeframe.

Strathalbyn Town Plan 2014-2024 - September 2014

Prepared in 2014 this town plan responded to experienced growth pressures and provided structure to accommodate projected population growth. A comprehensive plan, it considers a variety of matters including industrial land supply and retail and commercial development. At the time this report was prepared, the industry zone to the south of the town comprised approximately 98 hectares. Of the 98 hectares approximately 30 hectares had some form of development on it. The remaining/vacant land within the industry zone was identified as being able to accommodate an additional 400 allotments. As a result of relatively slow up take rates, this supply was considered sufficient, and no additional land was recommended to be reserved for such uses.

The plan goes on to evaluate retail service provision and opportunity for growth. At the time a proposal to rezone a significant parcel of land just north of the district centre was being proposed, however was challenged, and ultimately not supported. This took into account community sentiment which sought to keep the retail focus within the Town Centre Zone. Based on various supporting studies, this plan supported a modest expansion of food, retail and non-food retail, commercial and health services within the existing Town Centre Zone. This support was based on modelling which explored the potential of 1000 sqm for food retail and 2500 sqm for non-food retail. Retail development greater than this was projected to be detrimental to existing businesses and therefore not supported.

Middleton and Port Elliot Master Plans (DRAFT) April 2023

Both documents are described as place-based approaches to enhance respective towns and guide future development.

Middleton

At its core the Middleton Master Plan is based around four key actions to help achieve the community vision for Middleton, these are:

- 1. Middleton Main Street Project
- 2. Middleton Beach + Surfers Parade Upgrade
- 3. Modest western growth to township
- 4. Strategic transport improvements

The modest growth envisaged in the western part of the town is the most pertinent to this project as both options prepared include additional retail space in the form of a new market and supermarket facilities. This commercial area seeks to create a natural extension of the existing main street, providing additional retail and commercial areas to service a growing community. Commercial land in Middleton is tourism and retail focussed and this master plan doesn't propose any significant change in this regard.

Port Elliot

At its core the Port Elliot Master Plan is based around five key actions to help achieve the community vision for Port Elliot, these are:



- 1. Enhancing the public realm of the town centre
- 2. Port Elliot historic area Strengthen heritage and character in new development
- 3. Hill street placemaking for businesses
- 4. Targeted land use planning changes to support community needs
- 5. Strategic transport improvements

This master plan does not recommend growth of Port Elliot's commercial or industrial precincts. It does however seek to support the popularity of the employment and strategic employment zones along Hill Street through placemaking initiatives.

The master plan notes that Hill Street is developing into a successful business precinct, led by developments such as Factory 9. However, the amenity of the street is considered poor, with no footpaths and a lack of greening. The plan recommends Council collaborate with business owners to improve the amenity of the street, with a focus on footpaths, verge greening and trees.



3. Key trends and project context

This section sets out the broad trends influencing land use and settlement patterns across Australia. Each of these is discussed in detail, with the specific implications for Alexandrina and its townships described.

3.1 Summary of township change trends

A range of trends are expected to influence the evolution and growth of centres across Australia in coming years. These are set out and described in the table below. Whilst each of these trends is expected to shape the evolution of centres across Alexandrina, some factors are expected to be stronger than others.

The relevance of these trends in relation to Alexandrina's townships is also described.

Table 4. Summary of retail and centre trends

Retail expenditure trends			
Retail expenditure growth	Retail expenditures are linked to population growth, worker inflows, tourism and visitation and broader economic concerns. Over the past few years, retail expenditures have been strong, supported by expansionary monetary and fiscal polies. However, from early 2023, inflation and broader economic uncertainty is beginning to have an impact on consumer confidence and retail expenditures, with aggregate retail expenditures beginning to decline.		
	With reductions in retail spending and tourist activity expected, there is a significant likelihood that the Alexandrina retail sector will underperform in coming years.		
Expenditure by sector	In recent years, the performance of retail expenditure categories has varied. This reflects both the impact or online expenditure (with certain goods more conducive to online retail than others) and changing consumer preferences.		
Impact of online retailing			
The growth of online retail	on Poline retailing is becoming an increasingly important factor in Australia's retail economy, with the volume of Australians' retail expenditure directed online growing strongly over the recent decade, with particularly significant growth in the years of and following the COVID pandemic. The growth of online retail will have an important role on land use, with expenditures drawn away from 'bricks and mortar' retailers and centres.		
Growth of multi- and omni- channel retailing	These represent an emerging retail model that moves away from traditional retailing, bringing together the positive attributes of online retailing (convenience and value) with the sort of customer experience that onl physical retailing can provide. This form of retail reenvisages the role of the shopfront less as a location for sales transactions, and more as a place for customer engagement and experience. The implications of the growth of this form of retailing are important, with the need to focus on customer experience extending beyond the shopfloor and into surrounding centres.		
The changing role of retail	anchors		
	Supermarkets have traditionally acted as centre anchors across Australian centres, though emerging changes in the way they function threaten to have flow on implications for the function of centres. These include:		
	- Click and collect/ pick up,		
	- Home delivery,		
	- The growing viability of 'dark stores' in larger centres, and		
	 Increasing sophistication of offer (i.e., quasi-artisanal bakeries, delis, fromageries, etc., and in-store cafes) 		
	The effect of the first three trends ultimately mean a reduction of foot traffic in centres, with changing implications for land use. Ultimately, they will translate to a reduced need for supermarket floor space to		



	service a given quantity of food and grocery expenditure, while fewer supermarket visitors mean less foot traffic, and less expenditure available for surrounding retail and hospitality businesses.
	Increasing sophistication of offer (Foodland's outlets at Frewville and Pasadena offer good examples of this) also means a greater share of food and grocery expenditure can be accommodated within single stores, potentially reducing foot traffic in surrounding parts of centres.
Department stores	Department stores were traditionally important attractors to large centres in particular; however in recent decades they have declined in importance in relative terms in Australian centres. This has occurred partly because of changing consumer tastes (see below), and also as a consequence of the growth of online retailing for which the types of products typically sold in department stores are particularly well-suited.
Bulky goods	Bulky goods retailers are traditionally located on the edge of centres, or on in separate car-based bulky goods precincts. Floor space demand from catchment populations is likely therefore to be best met in non-centre locations. In general, the sorts of business that locate within these precincts tend to gravitate towards larger population centres.
Retail as an experience	
Shift in preferences away from goods and towards services and experiences	In recent decades, there has been a noted shift away from demand for goods, or 'things', and towards experiences. This trend has implications for centres, the most successful of which will successfully link in retailing with the provision of high-quality experiences. This has implications for centre planning in Alexandrina, with the quality of the town centre experience increasingly valued by residents and visitors.
Mission versus leisure retailing	Centre visitors are increasingly engaging in shopping for leisure. This necessitates the delivery of well-designed, high-quality physical spaces, a mix of hospitality and entertainment uses, greenery, public art, undercover parking and efficient, safe and attractive connections to and within the centre.
Increased localism in retail, hospitality and centres	Localism refers to the idea that a sort of geographically specific <i>essence</i> should be reflected in centres, and the retail and hospitality businesses that are located within them. This is linked to circular economic principles, with (among other things) seek the reduction of waste through the establishment of robust local supply chains.
	Localism can be expressed in local centres by fostering a strong connection between local customer-facing businesses and local producers further back in the supply chain as well as the local area more broadly. This ca be achieved through providing grants to locally owned businesses, fostering links between centre businesses and regional producers and manufacturers, and designing centre spaces that reflect local culture and attributes.
Hyperlocal retailing	Hyperlocal retailing is an approach to the marketing of goods and experiences that seeks to tailor in-store experiences to reflect local cultures and preferences. It is linked to changes customer preferences and seeks to offer a retail experience that feels grounded in the 'local', even where that experience is provided by (say) a multi-national retail or hospitality chain. It is a related idea to <i>localism</i> and <i>circular economy</i> in that it is linked to the growth of regional supply chains and the establishment and leveraging of distinct regional brands.
Fine grain retail formats	Linked in with ideas around the benefits of urban density, is the idea that centres function more effectively when they are of a <i>fine-grained</i> format. Notwithstanding the importance of large format anchors, such as supermarkets, centres with fine grain formats are generally walkable, with a diverse mix of uses appealing to wide range of user groups. These features tend to foster higher levels of foot traffic, which in turn supports aggregate centre expenditures and business viability.
Markets and events spaces	The importance of high quality, curated public spaces is becoming increasingly widely acknowledged within Australian centres. Increasingly, seasonal events, cultural celebrations, markets, and more are recognised as ways to bring larger numbers of residents and visitors (along with their expenditures) to centres.
	These events bring greater visitation to centres, supporting business viability and the establishment and reinforcement of distinct local cultures. They require appropriately configured public spaces, ideally centred around open spaces or plazas, or alternately full or partial road closures.
Night time economy	A strong night time economy (NTE) is an increasingly important element of centre economies and is particularly closely associated with hospitality businesses.
	Expansion of the NTE is driven by a range of factors, including:
	 Changing consumer preferences, with the propensity of people to spend on experiences (such as eating out) growing,



- Increases in wealth and disposable income,
- Increased leisure time, driven by increased worker flexibility, and
- A reduction in the number of households with dependent children.

An established NTE is important economically, supporting business viability, especially in the parts of Alexandrina where tourist visitation is an important contributor to the local economy. It also serves an important social function, providing opportunities for social interactions, and employment opportunities for younger residents in particular. For Alexandrina, where there are large numbers of single and dual occupant households, a NTE also has an important role to play in combating loneliness among local residents.

The role of hospitality

The growth of hospitality

Hospitality has been one of the strongest performing retail sectors in recent years, outperforming other categories of retail across Australia.

The success of the sector will be underpinned by evolving consumer preferences, population growth, and the fact it is relatively impervious (compared to many other sectors) to competition from online retailers.

3.2 Employment land trends

Increase in global trade

Global trade plays an important role in fostering demand for employment lands across Australia and its regions. As the volume of exports and imports grows, driven by growing global demand, increases in Australians' wealth, and a trend toward declining freight costs, the volume of land required to support these activities is also expected to grow.

Trade-related land uses include storage facilities, and inland ports, associated with the break up and distribution of consumer goods. In addition, opportunities for local value adding to local primary produce is also associated with global trade.

Changing role of employment lands

Historically, the term *industrial land* was used to describe land providing employment outside of the activity centre network, the Central Business District (CBD) and institutional uses (i.e., schools, universities, and hospitals). In times where manufacturing made up a significant proportion of total employment in Australia (and absorbed a substantial quantity of demand for employment lands), use of this terminology was entirely warranted.

In recent years, however, the range of activities taking place within these precincts has evolved from traditional manufacturing, and the term *employment land* has emerged as a more appropriate term to classify these precincts.

Modern employment precincts are home to an increasingly diverse set of uses, with traditional (i.e., manufacturing, warehousing, trade supplies, and freight-related) uses increasingly giving way to a range of population-serving uses and high-skill sectors. This transition has occurred for several reasons:

- Knowledge-intensive activities seeking locations close to related activities not located in central cities (i.e., ASC close to the submarine manufacturing facility, and Tonsley adjacent to Flinders University and Medical Centre),
- Reduced need for separation of uses as a result of industrial activities that (in general) generate fewer negative externalities (i.e., noise, odour, etc.), and
- Land use economics, with low land values relative to centres appealing to service sector businesses that don't necessarily need a centre location.

Changing face of manufacturing

From around 1980, a policy shift away from the protection of Australian manufacturing businesses from competition with overseas businesses has resulted in a net loss of manufacturing activity in Australia, and a shift towards manufacturing that leverages Australia's competitive advantages in *knowledge generation* and *primary production* in particular.

While many relatively labour-intensive manufacturing businesses (e.g., vehicle manufacturing) are no longer competitive in Australia, relatively capital-intensive activities that leverage Australia's skills base and its



highly regarded agricultural sector remain important. Land adjacent to producer regions and knowledgegenerating institutions are particularly suited to these forms of manufacturing.

Change in worker/ customer expectations regarding amenity

With employment precincts increasingly home to relatively highly-paid workers in knowledge-intensive sectors, it is important that high quality amenity is provided within these precincts to ensure they are able to compete meaningfully for these workers and the businesses that employ them.

Because of the need to provide a high-quality urban environment, the need to ensure that employment precincts include high quality informal green spaces, hospitality, and good quality pedestrian infrastructure is increasingly well understood.

Growth of online expenditure

Whilst online expenditure is likely to have a detrimental impact on centres, with foot traffic and expenditures diverted away from 'bricks and mortar' retail and hospitality businesses, the same trend has the potential to increase demand for employment lands, with larger quantities of goods requiring packaging, shipping, storage and distribution. These sorts of uses are well-suited to employment lands and have the potential to contribute significantly to employment land take-up in future.

3.3 COVID-19 Pandemic and Recovery

The COVID-19 pandemic has had a significant impact on the Alexandrina population and economy. In modelling future demand for land within the region, it is important to be mindful of the ongoing consequences of this event.

The region's townships play important roles as service centres for a wider rural catchment, so to some extent their fortunes are tied to those of the agricultural sector. For many of these agricultural businesses, strong global commodity prices have led to favourable economic outcomes, in turn supporting strong economic performance in regional service centres. Given uncertainty in the broader economy (see section 3.4Error! Reference source not found.), there is some risk that these conditions will not endure.

In addition, townships in the south of the LGA are heavily reliant upon tourism and visitation. Areas in the south of the LGA (line with most other parts of regional South Australia) actually benefitted from the restrictions on travel, and the reduction in overseas and interstate visitation was more than made up by increases in visitation from South Australian residents, who were forced to take holidays within the state's borders.

To the extent that the local economy serves a population-serving role, it is vulnerable to other changes precipitated by the COVID-19 pandemic. The changes in consumer behaviour facilitated by new and improving technologies has meant that, since 2019, the growth in consumer expenditure directed online has grown substantially (see section 3.1).

3.3.1 Online retail expenditures

The chart below shows a dramatic jump in online expenditure across Australia in March 2020, and another in mid-2021, associated with the Victorian and New South Wales lockdowns. The data reveals that, despite the end of lockdowns in late 2021, online expenditures remain significantly higher than pre-pandemic levels, suggesting changes in consumer behaviour observed through 2020 and 2021 are likely to have become permanent. It also shows the unique vulnerability of non-food expenditures to online retailing, with 16.1% of total non-food retail expenditure going to online retailers, compared to only 5.3% for food retail⁶.

With online expenditures translating to reduced footfall in activity centres, and less expenditure for which to compete, these new consumer behaviours present a significant challenge to retail and hospitality businesses. This trend highlights the risk to centres posed by ongoing growth in online expenditures. This shift to online expenditure does have the potential to be an opportunity for regionally-based businesses to access a larger market of online shoppers. In both instances, increasing online expenditure necessitates an expansion of the local postal, freight and transportation sector to enable online goods to compete with local retail in terms of convenience.

 $^{^{\}rm 6}$ 8501.0 Retail Trade, Australia (figures for April 2023)



\$4,500 \$4,000 \$3,500 \$3,000 \$2,500 \$2,000 \$1,500 \$1,000 \$500 \$0 Apr-2014 Jul-2014 Oct-2015 Apr-2016 Jul-2016 Oct-2016 Jan-2017 Apr-2017 Oct-2017 Apr-2018 Jul-2018 Oct-2018 Jan-2019 Apr-2019 Jan-2016 Jan-2018 Jul-2019 Oct-2019 Jan-2020 Apr-2020 Jul-2020 Oct-2020 Jan-2021 Oct-2014 Jan-2015 Jul-2017 ■ Food Non-food

Figure 12. Seasonally adjusted monthly online expenditure, Australia (\$m)

Source: Australian Bureau of Statistics

3.4 The broader economic context

There is good reason to assume that the near and medium-term prospects for the Australian economy (and hence, Australian centres) are poor.

In recent times, consumer sentiment declined to one of the lowest levels ever recorded. This pessimism is likely to have an impact on centres, with consumers reducing spending and increasing their savings in anticipation of challenging times.

High consumer price inflation and relatively low wage and economic growth has led to the destruction of wealth as the real value of income and assets is eroded.

As a response to the high inflation environment, the RBA cash rate has risen sharply. These increases in the cost of



capital are intended to cool the economy and control inflation, but they also reduce the size of household budgets, increase the cost of investment in capital stock, and contribute to a lack of certainty among the Australian public.

Understanding these macroeconomic vulnerabilities is important in setting out strategic planning. Holding all else constant, the heightened potential to encounter downside risk suggests a need to be conservative in proposing the expansion of productive lands, with a focus on securing and supporting existing lands potentially taking precedence over expansion.



3.5 The circular economy

3.5.1 Circular economy policy

The term 'Circular economy' encompasses intentional design for a waste-free industrial economy and a framework addressing global challenges like climate change, biodiversity loss, waste, and pollution. Guided by three principles—eliminating waste and pollution, circulating products at their highest value, and regenerating nature—it combines proactive design for waste reduction with sustainable resource management and ecological regeneration.

In the perspective of spatial and land use planning, to achieve a circular economic community, local understanding of the area's strengths and challenges are required, consideration as to where the community is at today is important before projecting forward to where it needs to be. Some strategies within spatial planning which enables a community to transition into a circular economy includes optimising resource flows, promoting industrial ecology, developing circular infrastructure, strategizing urban design, and fostering stakeholder collaboration.

To encourage South Australia's transition into a circular economy, Green Industries SA has formulated a Strategic Plan 2021-2025. The plan has 5 main objectives: circular products and services, circular consumption, circular resources recovery, circular sectors and circular capacity. Of these, Circular Consumption is most influential to future land use. Current actions in this objective prioritises funding in education of waste diversion and recovery of resources from households. In the future, spatial planning and land use should take into consideration multi-unit dwellings and public space recycling by adopting international standards and knowledge in systems to encourage correct recycling and reusing. Land use strategies should also accommodate for collection and sorting infrastructure systems that are innovative and high-tech for it to be blended into residential and mixed-use developments.

Infrastructure planning and investment will play critical roles in supporting the future industry development and economic growth. The current waste management and resource recovery infrastructure was planning in the 'Waste and Resources Recovery Infrastructure Plan' which was established in 2016. The model projected scenarios for waste flow projections in the next 10-30 years and the corresponding infrastructure needs.

South Australia's Waste Strategy 2020-2025 proposes quantitative targets for municipal solid waste (MSW), commercial and industrial (CandI), construction and demolition (CandD) waste streams and per waste capita reduction but does not explicitly target land use and spatial planning strategies.

Alexandrina Council has responded to these strategies through an A2040 plan. One of the objectives is to create a Green Alexandrina, where the region will be where "...nature is valued, and resources are managed sustainably and creatively for a new economy." Infrastructure planning include providing support and encouragement of the use of low emission vehicles through provision of vehicle charge points in main streets and recycle materials and low carbon pavements will be used for annual local road improvements.

In terms of fostering stakeholder collaboration, A2040 plans to extend to circular resource systems through regenerative farming, aquaculture and nature-based recreation and ecotourism. Council will encourage private businesses by example through the delivery of 'plastic free' community events and the creation of policies and guides for plastic free private events and destinations across the Fleurieu.

These are forecasted goals set out in the A2040 plan, but Alexandrina Council has already begun implementing some of these principles. Council has been actively educating the community on concepts which will contribute to a circular economical community for the future. Such as regenerative food systems, transport options for Alexandrina residents on the Coast.

3.5.2 Implications for land use



Facilitating a local circular economy has multiple implications for how land is planned:

- Improving both logistical and business connections between local consumption and local production to ensure that using local goods is the most efficient outcome where possible, reducing the need for transportation where it is avoidable.
- Making land available for localised waste collection and recycling facilities, and planning for recycling processes to change over time and become more efficient.
- Embedding flexibility and a preference for increased density over time into long-term strategic planning.

As the circular economy and related businesses are still an emerging sector, providing flexibility for future adoption of new technologies and practices is the most relevant activity for Alexandrina to undertake now. Given the size of the LGA in comparison to nearby centres, it is likely that Alexandrina will play a secondary role in facilitation of the circular economy, reinforcing the importance of leaving flexibility in land use planning to be able to capitalise on developments in neighbouring centres when they occur.



4. Supply of productive economy land

This section reviews the supply of productive economy land looking at it across two broad categories. Firstly, there is a review of employment land, including total land area zoned for those uses, estimates of land within these employment land precincts that is either occupied or significantly constrained, and available land. A brief qualitative description of each of the Alexandrina precincts is also provided.

Total floor space across each of the regional centres is also summarised, with these floor space estimates broken down by retail category.

4.1 Supply of employment land

Employment lands across Alexandrina Council are zoned either Strategic Employment (SEZ) or Employment Zone (EZ). These occur across five distinct precincts, and each of these is summarised below.

4.1.1 Goolwa (Strategic Employment Zone)

The Goolwa Strategic Employment Zone is to the west of the town centre, with Port Elliot Road forming its southern boundary. Its central location provides good accessibility to the wider Goolwa township and supports its use for a range of population-serving uses.

It is characterised by relatively small blocks and is occupied by a mix of population services and storage facilities among others.

It is evidently highly sought after as a business location, with an estimated 97% of the total area occupied and minimal vacancies across the precinct.



Table 5. Employment land supply breakdown, Goolwa (Strategic Employment Zone)

Sub-precinct	Total zoned area (sqm)	Occupied or constrained (sqm)	Occupied or constrained (% of total area)	Available zoned land (sqm)
А	85,600	82,900	97%	2,620
В	1,900	1,900	100%	-
С	26,500	26,500	100%	-
D	20,400	18,600	91%	1,800
TOTAL	134,400	129,980	97%	4,420

Source: TSA Management

4.1.2 Goolwa (Employment Zone)

Goolwa's employment zone is located close to the centre of town, sandwiched between Goolwa Shopping Centre, Goolwa's sporting precinct, and Goolwa's inner-southern residential neighbourhoods. It is bisected by the rail line, and once again characterised by small block sizes which tend to suit population serving business activities.

It is occupied by a range of businesses including auto retailers and services, trade supplies, and personal services businesses typically found in activity centres, including hair and beauty services.

Activity within the precinct is constrained by its scale and proximity to highly sensitive uses, including residential, recreational and retail uses.



Land in the south of the preinct (sub-precinct B) is presently occupied by dwellings and is likely to be relatively unappealing to future employment land businesses due to high cost of land acquisition, poor road accessibility, proximity to sensitive uses, and its irregular shape.

The precinct has few vacancies, with an estiamted 88% of total zoned land either occupied or significantly constrained.

Table 6. Employment land supply breakdown, Goolwa (Employment Zone)

Sub-precinct	Total zoned area (sqm)	Occupied or constrained (sqm)	Occupied or constrained (% of total area)	Available zoned land (sqm)
А	7,170	4,385	61%	2,785
В	11,800	11,800	100%	-
С	5,360	5,360	100%	-
D	4,300	3,700	86%	600
TOTAL	28,630	25,245	88%	3,385

Source: TSA Management



4.1.3 Mount Compass (Employment Zone)

The Employment Zone land at Mount Compass has a narrow north-south configuration, on the Western side of Sand Mine Road to the west of the township.

It is occupied by a range of businesses including freight and logistics, engineering, and building and trade supplies. The northern part of the precinct closest to Victor Harbor Road is the most established, with the undeveloped lots mostly found at the southern end of the precinct.

Some lots are presently used for dwellings and undeveloped lots are heavily treed. As a result of the relatively high cost of land with established residences, and the cost involved with clearing native vegetation, there is some doubt regarding the feasibility of employment land development in the medium term.

Consequently, there is little immediately available vacancy within the precinct, with an estimated 93% of zoned land either occupied or substantially constrained.

Another important feature of the Mount Compass precinct is, while it is largely occupied, existing uses are dispersed relatively inefficiently across the precinct. New activity could therefore be accommodated within the precinct in future years simply through more efficient use of precinct land.



Table 7. Employment land supply breakdown, Mount Compass (Employment Zone)

	Total zoned area (sqm)	Occupied or constrained (sqm)	Occupied or constrained (% of total area)	Available zoned land (sqm)
TOTAL	78,000	72,650	93%	5,350

Source: TSA Management

4.1.4 Port Elliot (Employment and Strategy Employment Zone)

The Port Elliot employment precinct comprises two zones along Hill Street – an Employment Zone in the east, and a Strategic Employment Zone in the west.

This is a highly mixed precinct, with large numbers of businesses across a range of industries, including wholesale trade, construction services, wholesale trade, personal services, and hospitality. The mixed nature of land uses in this precinct present a challenge given how ideal precinct attributes differ by user group (between, say, hospitality businesses and construction supplies or light manufacturing).

The establishment of uses arguably better suited to town centres within this precinct raises important questions around the appeal of floor space within the Port Elliot town centre.

The precinct is heavily occupied, with an estimated 87% of zoned land taken up.



Table 8. Employment land supply breakdown, Port Elliot (Strategic Employment and Employment Zones)

Sub-precinct	Total zoned area (sqm)	Occupied or constrained (sqm)	Occupied or constrained (% of total area)	Available zoned land (sqm)
А	126,000	106,000	84%	20,000
В	92,000	83,600	91%	8,400
TOTAL	218,000	189,600	87%	28,400

4.1.5 Strathalbyn (Employment and Strategic Employment Zone)

Strathalbyn is the place with the largest quantity of employment land in Alexandrina, with just under two thirds of the total employment land in the LGA.

It is also the precinct with the largest amount of vacant land. It is estimated that there is presently around 530,000 sqm of vacant land across both zones -93% of the total vacant employment land across the municipality.

Most vacancies are found in the southern part of the precinct (sub-precincts C and D). Whilst development is occurring in these parts of Strathalbyn, master-planning and large-scale investment in infrastructure will be necessary to unlock much of this development.



Table 9. Employment land supply breakdown, Strathalbyn (Strategic Employment and Employment Zones)

Sub-precinct	Total zoned area (sqm)	Occupied or constrained (sqm)	Occupied or constrained (% of total area)	Available zoned land (sqm)
А	88,700	11,000	12%	77,700
В	175,000	157,000	90%	18,000
С	245,000	77,000	31%	168,000
D	370,000	103,700	28%	266,300
TOTAL	878,700	348,700	40%	530,000

Source: TSA Management



4.1.6 Municipal and subregional summaries

The table below shows employment land by precinct aggregated into subregions (i.e., Coastal and Inland Alexandrina), and in total.

This regional distinction reflects the very different contexts within which demand for employment land is expected to occur in each of the precincts. The region surrounding Strathalbyn and Mount Compass is dominated by primary production. Whilst the population is growing – driving demand for population-serving uses – there are significant opportunities linked to food processing and manufacturing. In contrast, the tourist and visitation focus of the coastal economies presents a different set of employment land opportunities servicing the needs of these groups, as well as the local population.

The sub-regional breakdown shows that whilst take-up is relatively similar across each of the precincts (345,000sqm in inland Alexandrina, and 421,000sqm in coastal Alexandrina), employment land in the latter region is far more constrained, with only 10% of zoned land (totalling 36,000sqm) realistically available for new development, compared with 56% (535,000sqm) in inland Alexandrina.

Table 10. Employment land supply breakdown, Strathalbyn (Strategic Employment and Employment Zones)

Sub-precinct	Total zoned area (sqm)	Occupied or constrained (sqm)	Occupied or constrained (% of total area)	Available zoned land (sqm)
Goolwa (SEZ)	134,400	129,980	97%	4,420
Goolwa (EZ)	28,630	25,245	88%	3,385
Port Elliot (SEZ and EZ)	218,000	189,600	87%	28,400
Coastal Alexandrina	381,030	344,825	90%	36,205
Mount Compass (EZ)	78,000	72,650	93%	5,350
Strathalbyn (SEZ and EZ)	878,700	348,700	40%	530,000
Inland Alexandrina	956,700	421,350	44%	535,350
TOTAL	1,337,730	766,175	57%	571,555



4.2 Supply of town centre floor space

4.2.1 Retail

The following section presents estimated existing retail floor space across each of the five categories across the five Alexandrina townships. The data shows that Goolwa is the largest centre in Alexandrina as defined by centre floor space, followed closely by Strathalbyn. The table also shows that Strathalbyn has by far the largest quantity of urban service floor space within its town centre land.

Table 11. Estimated retail floor space by category (sqm)

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises	TOTAL (w.o urban services)	Urban services	TOTAL
Goolwa	3,101	368	2,961	564	554	414	1,175	967	2,425	12,530	-	12,530
Middleton	118	67	395	0	0	0	357	106	331	1,443	368	1,811
Mount Compass	801	169	154	163	83	165	205	46	400	2,186	525	2,711
Port Elliot	778	91	1,121	219	237	0	437	621	778	4,281	-	4,281
Strathalbyn	2,856	221	1,523	497	544	648	923	789	1,332	9,335	2,704	12,165

Source: TSA Management



5. Employment land demand

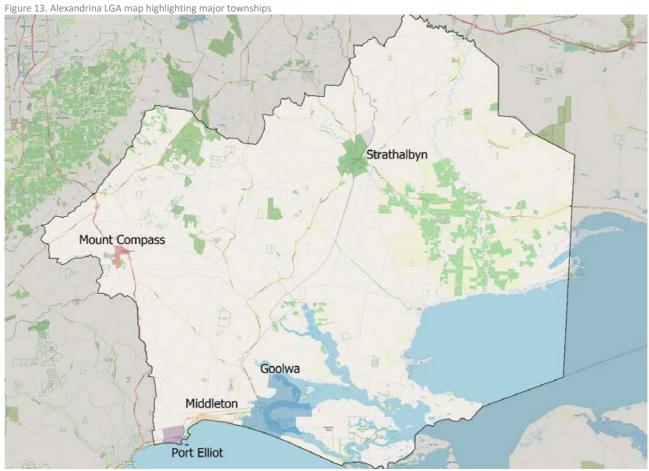
This section sets out to model demand for employment land across Alexandrina Council, and within its five key townships to 2056. These demand estimates are aligned to existing employment land supply (see previous chapter) to show how changes in the regional economy are likely to impact the take-up of land across Alexandrina's townships.

TSA's approach is premised on the idea that demand for employment land is linked to changes in local employment and population. As a result, population and employment projections (by ANZSIC employment classification) form important assumptions that underpin the work.

5.1 Study area catchment

The projections set out below model demand linked to changes in the Alexandrina economy, so consideration is limited to the Alexandrina economy and workforce across the LGA – not only within the designated township boundaries.

The catchment – defined by the LGA boundary – is shown in the figure below.





5.2 Employment by industry – existing and projected

The approach adopted here to project demand for employment land is driven by projected employment by industry, which can also (for several population-serving industries) be linked to growth in resident population.

TSA has developed population projections based on the South Australian Government projections and TSA's own methodology. These show that population is expected to grow strongly across Alexandrina, with average annual growth rates of around 1.6%.

From these population projections, TSA has also developed employment projections for the Council area. These projections are set out below and show that local jobs are expected to increase from around 8,000 today to 10,000 by 2036 and around 13,600 by 2056.

Reflecting the fact that there are two distinct economic regions in Alexandrina, with different economic structures and growth drivers, we have produced separate models for *inland* and *coastal* Alexandrina. In carrying out the modelling process in this way, we are able to capture intra-regional nuances, including the dominance of *wine manufacturing* in inland Alexandrina, which typically does not take place in employment precincts, and variation in the importance of tourism between coastal and inland parts of Alexandrina. These differences have important implications for land use between the regions, necessitating the development of two models.

Unlike in many Australian states, in South Australia, there are no publicly available small area employment forecasts. We have therefore developed our own projections based our understanding of industry trends, drivers of activity by industry, and a host of other factors.

The key considerations underpinning the development of these forecasts are set out below.

- 1. Rates of growth are likely to vary depending on whether jobs are population serving, or strategic/export focussed.
- 2. For jobs in *population-serving* sectors, local employment is assumed to grow in line with local population. With sectors whose growth is driven by factors unrelated to the size of the catchment population (i.e., strategic sectors), we adopt alternate projection approaches, based on a mix of trend growth as well as factors set out in section 3.
- **3.** For some sectors most notably Transport, Postal and Warehousing in Coastal Alexandrina employment projections have taken into consideration existing land supply constraints. This is most relevant to Coastal Alexandrina, where there is limited supply of employment land, particularly of the lot sizes preferred by some industries.
- **4.** To 'sense check' overall forecasts, job/resident ratios are calculated for each year from 2016 to 2041 to ensure that change in the ratio of workers to residents is reasonable. These ratios show local jobs per working-age resident growing from 0.63 to 0.69 between 2016 and 2041. This minimal change indicates that the projections reasonably reflect the current state.
- **5.** The small increase in jobs per resident would be expected for a region whose economy is expected to become less about servicing the needs of local residents and increasingly export-focused.



5.2.1 Coastal Alexandrina – employment projections

The following table shows projected employment growth for coastal Alexandrina. It reveals strong growth in population and tourist-serving sectors, and total increase in local employment of around 64% between 2021 and 2056.

Table 12. Employment trends and projections – coastal Alexandrina

Year	2011	2016	2021	2026	2031	2036	2041
Agriculture, Forestry and Fishing	75	86	89	89	89	89	89
Mining	-	6	6	6	6	6	6
Manufacturing	215	204	231	239	246	254	262
Electricity, Gas, Water and Waste Services	39	51	66	70	76	82	88
Construction	250	344	412	439	473	513	546
Wholesale Trade	42	36	46	53	61	70	80
Retail Trade	369	402	428	449	475	505	529
Accommodation and Food Services	345	369	491	553	622	700	787
Transport, Postal and Warehousing	106	116	67	65	63	61	60
Information Media and Telecommunications	10	9	15	17	20	23	26
Financial and Insurance Services	30	39	30	34	39	45	52
Rental, Hiring and Real Estate Services	69	67	41	43	47	51	54
Professional, Scientific and Technical Services	119	120	142	154	166	177	189
Administrative and Support Services	65	74	102	109	117	127	135
Public Administration and Safety	167	192	224	239	258	279	297
Education and Training	179	184	194	206	222	241	256
Health Care and Social Assistance	343	505	573	610	658	713	759
Arts and Recreation Services	51	47	63	67	73	79	84
Other Services	108	132	157	167	180	195	207
TOTAL	2,582	2,984	3,378	3,609	3,891	4,208	4,506



5.2.2 Inland Alexandrina – employment projections

Employment growth rates by sector for inland Alexandrina are shown below. Employment growth rates for inland Alexandrina are similar to those in coastal areas, with a projected growth rate between 2021 and 2056 of around 73%.

Table 13. Employment trends and projections – inland Alexandrina

Year	2011	2016	2021	2026	2031	2036	2041
Agriculture, Forestry and Fishing	948	993	1,090	1,117	1,145	1,173	1,203
Mining	165	72	92	92	92	92	92
Manufacturing	580	429	455	523	602	692	796
Electricity, Gas, Water and Waste Services	21	25	35	38	41	44	48
Construction	290	291	357	386	416	448	485
Wholesale Trade	161	108	123	142	163	187	215
Retail Trade	404	363	388	407	431	457	479
Accommodation and Food Services	258	252	302	332	365	402	442
Transport, Postal and Warehousing	139	152	162	186	214	246	283
Information Media and Telecommunications	15	14	24	29	33	38	42
Financial and Insurance Services	32	56	47	47	47	47	47
Rental, Hiring and Real Estate Services	42	40	35	38	41	44	48
Professional, Scientific and Technical Services	155	153	179	191	204	216	228
Administrative and Support Services	90	88	116	128	141	155	171
Public Administration and Safety	63	65	49	53	57	61	66
Education and Training	301	377	449	486	524	564	610
Health Care and Social Assistance	414	491	510	553	596	642	694
Arts and Recreation Services	75	77	101	109	118	127	137
Other Services	163	175	198	215	231	249	270
TOTAL	4,313	4,220	4,712	5,072	5,460	5,886	6,357

Source: TSA Management

5.2.3 Broad land use categories

Once again, the employment land modelling carried out by TSA rests upon an assumption that demand for floor space is linked to changes in the size and shape of the regional workforce. There is a further step required, however, before changes in employment can be converted to changes in demand for different land uses.

To do this, TSA have developed a matrix which maps the relationship between industries (by ANZSIC) and Broad Land Use Categories (BLCs). BLCs reflect the range of productive land typologies seen across Australia, from commercial office space, to manufacturing precincts, to town centres. The BLC matrix reflects broad patterns seen across Australian urban areas, as well as unique local supply side factors, which, in the case of Alexandrina mean that (for example) professional services jobs are likely to be situated on a main street, rather than in a commercial office building as they would if they were located in the Adelaide CBD.

As discussed, the BLC matrix apportions jobs by ANZSIC using experience gathered from land use audits associated with previous engagements, as well as our understanding of the unique features of the local economy. The need to



convert ANZSICs to BLCs is linked to the fact that jobs within a particular industry can be associated with demand for floor space across a range of land use types. For example, whilst most manufacturing jobs are linked to manufacturing facilities located within employment precincts, many workers within the sector are employed within administrative, RandD and other roles more closely linked to demand for land in commercial office buildings in CBD, or in suburban business parks.

The density of employment across these BLCs also tends to vary, which impacts the way in which growth across different industries contributes to the growth in demand for floor space. For example, whilst office and retail floor spaces tend to be used relatively intensively, with low floorspace per worker figures, for relatively land-intensive uses like freight and logistics, or manufacturing, the quantity of floor space for every worker is much higher. Floor space per worker ratios are set out at the bottom of Table 14 and Table 15.

Once again, these floor space densities reflect the findings of land use audits previously carried out, as well as supply-side factors unique to Alexandrina and the economies of its *inland* and *coastal* subregions.

Table 14. Broad land use category matrix – coastal Alexandrina

Industry	Non-urban	Accommodation	Business park	Dispersed/ footloose	Freight and Logistics	Public administration	Manufacturing	Office	Retail	Urban services	Primary/ secondary education	Tertiary education	Essential services
Agriculture, Forestry and Fishing	0.80			0.18				0.02					
Mining	0.95							0.05					
Manufacturing	0.50						0.50						
Electricity, Gas, Water and Waste Services	0.80			0.20									
Construction				0.68			0.10	0.02		0.20			
Wholesale Trade	0.30				0.10					0.60			
Retail Trade	0.05			0.30					0.65				
Accommodation and Food Services		0.30							0.68	0.02			
Transport, Postal and Warehousing	0.10			0.38	0.50			0.02					
Information Media and Telecommunications				0.50				0.50					
Financial and Insurance Services				0.40				0.60					
Rental, Hiring and Real Estate Services				0.20				0.20	0.20	0.40			
Professional, Scientific and Technical Services				0.50				0.50					
Administrative and Support Services				0.20		0.40		0.40					
Public Administration and Safety				0.30		0.70							
Education and Training									0.10		0.90		
Health Care and Social Assistance				0.20		0.10		0.05					0.65
Arts and Recreation Services	0.50					0.15			0.35				
Other Services	0.10			0.20					0.20	0.50			
SQM per worker	0	150	60	0	400	50	150	60	50	300	60	60	100



Industry	Non-urban	Accommodation	Business park	Dispersed/ footloose	Freight and Logistics	Public administration	Manufacturing	Office	Retail	Urban services	Primary/ secondary education	Tertiary education	Essential services
Agriculture, Forestry and Fishing	0.80			0.18				0.02					
Mining	0.95							0.05					
Manufacturing	0.60						0.40						
Electricity, Gas, Water and Waste Services	0.80			0.20									
Construction				0.68			0.10	0.02		0.20			
Wholesale Trade	0.30				0.10					0.60			
Retail Trade	0.05			0.30					0.65				
Accommodation and Food Services		0.30							0.68	0.02			
Transport, Postal and Warehousing	0.30			0.48	0.20			0.02					
Information Media and Telecommunications				0.50				0.50					_
Financial and Insurance Services				0.40				0.60					
Rental, Hiring and Real Estate Services				0.20				0.20	0.20	0.40			
Professional, Scientific and Technical Services				0.50				0.50					
Administrative and Support Services				0.20		0.40		0.40					
Public Administration and Safety				0.30		0.70							
Education and Training									0.10		0.90		
Health Care and Social Assistance	-	-	-	0.20	-	0.10	•	0.05	-			-	0.65
Arts and Recreation Services	0.50					0.15			0.35				
Other Services	0.10			0.20					0.20	0.50			
SQM per worker	0	150	60	0	400	50	250	60	50	350	60	60	100

5.2.4 Change in demand for floor space



Through application of the employment projections for inland and coastal Alexandrina to the BLCs set out in the previous section, it is possible to estimate demand for floor space by broad land use category and by sector. In carrying out this analysis, we assume that the BLCs linked to demand for employment land in Alexandrina are: *freight and logistics; manufacturing – light; office; retail;* and *urban services*.

Once again, demand is projected at the subregional level, with floor space demand estimated for inland Alexandrina (corresponding to the townships of Strathalbyn and Mount Compass), and coastal Alexandrina (comprising the townships of Goolwa, Port Elliot and Middleton).

Inland Alexandrina

Of the BLCs set out in the *broad land use category matrices* above, not all are associated with employment lands. Recognising that many of these BLCs are either not permitted on employment lands, or tends to be better suited to town centres, the following table shows only demand for land uses linked to demand for employment lands. In modelling this stage, we assume that all demand for land linked to freight and logistics, manufacturing – light, and urban services located within employment precincts. Recognising that a limited amount of retail, hospitality and office uses can be located within employment lands under certain circumstances, we assume that 5% of future demand for these uses finds expression in the region's employment lands, with the remainder locating in employment precincts.

This analysis shows that a total of 25,000 sqm of floor space will be demanded in Alexandrina by 2031, and 58,000 by 2041.

Table 16. Floor space demand by BLC, incremental to 2021 floor space estimates, inland Alexandrina – employment lands only

Year	Freight and Logistics	Manufacturing light	Office	Retail/main street	Urban services	TOTAL
2026	2,412	3,786	52	108	5,692	12,051
2031	5,187	8,084	106	230	11,752	25,359
2036	8,377	13,001	163	364	18,484	40,389
2041	12,046	18,651	223	501	26,183	57,604

Coastal Alexandrina



Once again, reflecting the fact that many BLCs are either not permitted on employment lands, or tend to be better suited to town centres, TSA has produced a table showing only demand for land expected to find expression within employment precincts. In modelling this stage, we adopt the same assumptions as were adopted in the previous section.

This analysis shows that just over 50% of demand for future employment land floor space will be linked to office, retail and light manufacturing uses, with a further 42% linked to urban services – a mix that once against reflects the population-servicing focus of the economy of coastal Alexandrina.

As stated at the start of this section, demand has been modelled with existing land supply and lot configuration already taken into consideration, resulting in a modest decrease in demand for Freight and Logistics land. This is because the larger lot sizes and more central location of employment lands in inland Alexandrina are likely to continue to be more attractive and efficient for expanding Freight and Logistics businesses, redirecting demand away from the coast. It is possible that some of the significant demand growth in Freight and Logistics floor space for inland Alexandrina could be redirected to the coast if employment land and supporting infrastructure was added to the coastal supply specifically to facilitate this kind of land use.

Table 17. Floor space demand by BLC, incremental to 2021 floor space estimates, inland Alexandrina – employment lands only

Year	Freight and Logistics	Manufacturing	Office	Retail/main street	Urban services	TOTAL
2026	-105	992	362	453	5,018	6,720
2031	-189	2,103	777	985	11,290	14,966
2036	-226	3,288	1,232	1,584	18,463	24,341
2041	-8	4,377	1,674	2,197	25,109	33,349

5.2.5 Change in demand for employment land

To understand how changes in employment impacts demand for employment land requires one final step – the conversion of demand for floor space to demand for employment land. The reflects the fact that not all designated employment land is converted to employment floor space, and that, depending on the land use, buildings rarely extent to lot boundaries – particularly in regional areas. In reality, a significant amount of employment land is set aside for supporting infrastructure, including off-street parking, storage areas, recreational areas, gardens, and landscaping.

To convert demand for floor space to demand for land, it is necessary to develop plot ratios for each BLC. For the modelled uses, employment land plot ratios adopted are:

- Freight and logistics 22.5%
- Manufacturing light 27.5%
- Retail main street 40%
- Office 40%
- Urban services 40%

Demand for employment land - inland Alexandrina

The table below shows demand for employment land across inland Alexandrina. It shows expected take up to 2036 of around 75,000sqm of employment land across the townships of Strathalbyn and Mount Compass, with a total of 235,000 hectares of additional land take-up anticipated by 2056.

Table 18. Demand for employment land, inland Alexandrina

Year	Freight and Logistics	Manufacturing light	Office	Retail/main street	Urban services	TOTAL
2026	10,722	13,766	131	270	14,231	39,120
2031	23,052	29,397	265	575	29,381	82,670
2036	37,232	47,275	407	911	46,211	132,036
2041	53,539	67,821	557	1,253	65,458	188,627

Source: TSA Management **Demand for employment land – coastal Alexandrina**

The table below shows demand for employment land across inland Alexandrina. It shows expected take up to 2036 of around 16,000sqm of employment land across the townships of Goolwa and Port Elliot, with a total of 45,000 hectares of additional land take-up anticipated by 2056.

Table 19. Demand for employment land, inland Alexandrina

Year	Freight and Logistics	Manufacturing light	Office	Retail/main street	Urban services	TOTAL
2026	3,994	3,607	377	181	6,966	15,700
2031	8,790	7,648	809	394	15,773	34,661
2036	14,637	11,957	1,284	633	25,836	56,354
2041	22,806	15,915	1,744	879	34,872	78,998



6. Retail floor space demand

This chapter models current demand for retail floorspace across Alexandrina Council's five key townships, providing projections out to 2056. These demand estimates are aligned to existing retail floorspace supply (see Chapter 4) to show how a range of factors including changes in regional population and visitation, and the evolution of the regional economy, are likely to impact the demand for retail space across the five key Alexandrina townships.

6.1 Approach to estimating floor space demand

A high-level summary of approaches adopted in measuring demand for floor space are set out below.

6.1.1 Resident expenditure

TSA's approach is based on defined trade area catchments for each of the five townships. The approach to developing these catchments, and the catchments themselves, is set out in the Appendix to this report.

To estimate floor space demand linked to residents, in the first instance we aggregate catchment *expenditure* estimates. These figures are then converted to local *turnover* estimates by accounting for *system leakages* (i.e., expenditure that leaves the local retail system, either due to online retailing or retail expenditures being directed to other centres). These local centre turnover estimates are then converted to floor space demand using measures of floor space productivity knowns as retail turnover densities (RTDs).

A step-by-step approach for each of the five centres is set out below.

6.1.2 Tourist expenditure

Tourism and visitation is an important contributor to the Alexandrina economy, particularly for the coastal townships, which see significant visitation numbers throughout the year.

The South Australian Tourism Commission regularly publishes data on overall visitation for the Fleurieu Peninsula while tourist expenditure for the region is published by the Federal Trade and Investment Commission through their Regional Tourism Satellite Account. TSA has allocated a portion of this expenditure and visitation to Alexandrina, split across the five townships considered with a weighting towards coastal Alexandrina.

Expenditure as reported by the Trade and Investment Commission has been aligned with retail categories used for endogenous household expenditure. To create projections into the future, the average annual visitation growth trend from 2010 to 2021 has been applied from 2026, recognising that annual visitation is unlikely to rise significantly in the coming years after its significant increase in 2021 driven by travel restrictions. Projections also model for the increasing wealth of tourists, using the same magnitude of increase as applied to households in the previous section.

These local expenditure figures are then converted to *floor space demand* estimates for each of the five townships.



6.2 Current retail floor space demand - Goolwa

Drawing on disaggregated retail expenditure data, we have estimated the amount of retail expenditure across the Goolwa catchments across each of the retail categories in 2021. With parts of coastal Alexandrina (including Goolwa) having a significant visitor economy, the impact of expenditure linked to non-residents is significant, and is modelled and presented separately.

6.2.1 Total catchment expenditure – Goolwa

The population of the Goolwa catchment is estimated to generate around \$189 million in retail expenditures across all categories. Gross retail expenditure figures are set out below.

Table 20. Total population catchment expenditure in 2021 (\$m) - Goolwa

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Primary	\$60.11	\$8.06	\$14.83	\$8.46	\$15.72	\$7.85	\$14.24	\$5.92	\$7.95	\$2.39	\$145.53
Secondary	\$17.05	\$2.57	\$4.75	\$2.71	\$5.01	\$2.22	\$4.02	\$1.85	\$2.24	\$0.76	\$43.16
TOTAL	\$77.16	\$10.62	\$19.58	\$11.18	\$20.73	\$10.07	\$18.26	\$7.76	\$10.19	\$3.15	\$188.69

Source: TSA Management

6.2.2 Expenditure leakage – Goolwa

A share of these expenditures is likely to leak out of the retail system due to expenditure in other centres and online. This share varies across retail categories and is set out in the table below. Online expenditures are assumed by the model to grow over time, as online retailing becomes more common.

Table 21. Expenditure losses from the retail system in 2021, assumptions – Goolwa

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises
Online expenditure leakage	2%	10%	7%	30%	30%	6%	20%	5%	25%	0%
Catchment expenditure capture										
Primary	80.0%	80.0%	90.0%	25.0%	25.0%	40.0%	25.0%	60.0%	60.0%	80.0%
Secondary	53.3%	53.3%	60.0%	16.7%	16.7%	26.7%	16.7%	40.0%	40.0%	53.3%

Source: TSA Management

6.2.3 Net catchment expenditures – Goolwa

Taking into consideration expenditure leakage, total catchment expenditures made within Goolwa across the retail categories are shown below. This table suggests that around \$98 million is spent in the township's retail centres.



Table 22. Total population catchment expenditure in 2021, net of expenditure leakage (\$m) – Goolwa

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Primary	\$45.69	\$5.80	\$12.35	\$1.48	\$2.75	\$2.51	\$2.67	\$3.37	\$3.58	\$1.91	\$82.11
Secondary	\$8.64	\$1.23	\$2.64	\$0.32	\$0.58	\$0.47	\$0.50	\$0.70	\$0.67	\$0.41	\$16.16
TOTAL	\$54.32	\$7.03	\$14.98	\$1.80	\$3.34	\$2.99	\$3.17	\$4.07	\$4.25	\$2.32	\$98.27

6.2.4 Tourist expenditures

Goolwa has a significant visitor economy, so therefore, expenditures linked to tourist visitation are significant. Annual related expenditures are set out in the table below.

Table 23. Tourist expenditures in 2021 (\$m) - Goolwa

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Tourist expenditure	\$5.66	\$3.23	\$10.09	\$1.35	\$0.68	\$1.35	\$6.77	\$2.03	\$1.35	\$0.81	\$33.34

Source: TSA Management

6.2.5 Total turnover

Combining the tables shown in sections 6.2.3 and 6.2.4, we arrive at a total retail turnover estimate by category for Goolwa. This table estimates total retail turnover within Goolwa's centres of around \$132 million.

Table 24. Total retail turnover in 2021 (\$m) – Goolwa

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Residents	\$54.32	\$7.03	\$14.98	\$1.80	\$3.34	\$2.99	\$3.17	\$4.07	\$4.25	\$2.32	\$98.27
Tourists	\$5.66	\$3.23	\$10.09	\$1.35	\$0.68	\$1.35	\$6.77	\$2.03	\$1.35	\$0.81	\$33.34
TOTAL	\$59.98	\$10.26	\$25.08	\$3.15	\$4.01	\$4.34	\$9.95	\$6.11	\$5.60	\$3.12	\$131.60

Source: TSA Management

6.2.6 Retail turnover densities

Retail turnover densities (RTDs) are measures of the productivity of floor space. These vary, with some retail floor space categories generally far more productive than others. There is also variation within categories across centres, with floor space productivity for a particular type of retail varying as a result of a range of local factors, including the size of the centre in which the store is located, centre quality, and catchment population size and wealth.

We apply the following RTDs as measures of floor space productivity within Goolwa's retail centres.



Table 25. Retail turnover densities - Goolwa

Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises
\$16,000	\$24,000	\$8,000	\$5,000	\$5,000	\$5,000	\$7,000	\$6,000	\$1,250

6.2.7 Floor space estimates

Dividing the category expenditures set out in section 6.2.5 with the RTDs shown in 6.2.6, it is possible to arrive at an estimate of current demand for floor space within Goolwa. This analysis shows demand for just under 20,000 sqm of retail floor space across Goolwa.

Table 26. Total floor space demand in 2021 (sqm) – Goolwa

Food and	groceries Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises	TOTAL
3,7	49 428	3,135	631	803	868	1,421	1,018	2,499	14,550

Source: TSA Management

6.3 Current retail floor space demand – Middleton

Drawing on disaggregated retail expenditure data, we have estimated the amount of retail expenditure across the Middleton catchments across each of the retail categories in 2021. With parts of coastal Alexandrina (including Middleton) having a significant visitor economy, the impact of expenditure linked to non-residents is significant, and is modelled and presented separately.

6.3.1 Total catchment expenditure – Middleton

The population of the Middleton catchment is estimated to generate \$34 million in retail expenditures across all categories. These *gross* retail expenditure figures are set out below.

Table 27. Total population catchment expenditure in 2021 (\$m) – Middleton

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
TOTAL	\$13.20	\$2.04	\$3.75	\$2.11	\$3.98	\$1.70	\$3.13	\$1.47	\$1.79	\$0.61	\$33.79

Source: TSA Management



6.3.2 Expenditure leakage - Middleton

A share of these expenditures is likely to leak out of the retail system due to expenditure in other centres and online. This share varies across retail categories and is set out in the table below. Online expenditures are assumed by the model to grow over time, as online retailing becomes more common.

Table 28. Expenditure losses from the retail system in 2021, assumptions – Middleton

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises
Online expenditure leakage	2%	10%	7%	30%	30%	6%	20%	5%	25%	0%
Catchment expenditure capture										
Primary	15.0%	60.0%	60.0%	0.0%	0.0%	0.0%	30.0%	15.0%	30.0%	65.0%

Source: TSA Management

6.3.3 Net catchment expenditures – Middleton

Taking into consideration expenditure leakage, total catchment expenditures made within Middleton across the retail categories is estimated at just under \$7 million per annum, as shown below.

Table 29. Total population catchment expenditure in 2021, net of expenditure leakage (\$m) – Middleton

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
TOTAL	\$1.88	\$1.10	\$2.08	\$-	\$-	\$-	\$0.70	\$0.21	\$0.40	\$0.40	\$6.78

Source: TSA Management

6.3.4 Tourist expenditures

Middleton has a significant visitor economy, so therefore, expenditures linked to tourist visitation are significant.

Table 30. Tourist expenditures in 2021 (\$m) – Middleton

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
TOTAL	\$0.67	\$0.52	\$1.05	\$0.16	\$-	\$0.16	\$0.80	\$0.24	\$0.16	\$0.10	\$3.85

Source: TSA Management



6.3.5 Total turnover

Combining the tables shown in sections 6.2.3 and 6.2.4, we arrive at an estimated total retail turnover by category for Middleton, with an overall expenditure estimate of around \$10.6 million. These estimates are shown in the table below.

Table 31. Total retail turnover in 2021 (\$m) – Middleton

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Resident	\$1.88	\$1.10	\$2.08	\$-	\$-	\$-	\$0.70	\$0.21	\$0.40	\$0.40	\$6.78
Tourist	\$0.67	\$0.52	\$1.05	\$0.16	\$-	\$0.16	\$0.80	\$0.24	\$0.16	\$0.10	\$3.85
TOTAL	\$2.55	\$1.63	\$3.13	\$0.16	\$-	\$0.16	\$1.50	\$0.45	\$0.56	\$0.49	\$10.63

Source: TSA Management

6.3.6 Retail turnover densities

We apply the following RTDs as measures of floor space productivity within Middleton's retail centres.

Table 32. Retail turnover densities – Middleton

 Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises
\$13,000	\$22,000	\$8,000	\$-	\$-	\$-	\$4,000	\$4,500	\$1,500

Source: TSA Management

6.3.7 Floor space estimates

Dividing the category expenditures set out in section 6.2.5 with the RTDs shown in 6.2.6, we arrived at an estimated current floor space demand in Middleton of just under 1,500 sqm.

Table 33. Total floor space demand in 2021 (sqm) – Middleton

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises	TOTAL
TOTAL	196	74	392	-	-	-	376	100	328	1,465

Source: TSA Management



6.4 Current retail floor space demand - Mount Compass

Drawing on disaggregated retail expenditure data, we have estimated the amount of retail expenditure across the Mount Compass catchment for each retail category in 2021. Mount Compass, unlike the coastal parts of Alexandrina, does not have a significant tourism focus, with the town centre largely servicing the needs of the resident community.

6.4.1 Total catchment expenditure – Mount Compass

The population of the Mount Compass catchment is estimated to generate \$10 million in retail expenditures across all categories. These *gross* retail expenditure figures are set out below.

Table 34. Total population catchment expenditure in 2021 (\$m) – Mount Compass

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Primary	\$5.81	\$0.86	\$1.61	\$0.92	\$1.71	\$0.80	\$1.16	\$0.55	\$0.78	\$0.23	\$14.44
Secondary	\$3.68	\$0.59	\$1.19	\$0.67	\$1.23	\$0.53	\$0.86	\$0.39	\$0.50	\$0.19	\$9.83
TOTAL	\$9.49	\$1.45	\$2.80	\$1.59	\$2.94	\$1.33	\$2.02	\$0.94	\$1.28	\$0.42	\$24.26

Source: TSA Management

6.4.2 Expenditure leakage – Mount Compass

A share of these expenditures is likely to leak out of the retail system due to expenditure in other centres and online. This share across retail categories and is set out in the table below. Online expenditures are assumed by the model to grow over time, as online retailing becomes more common.

Table 35. Expenditure losses from the retail system in 2021, assumptions – Mount Compass

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises
Online expenditure leakage	2%	10%	7%	30%	30%	6%	20%	5%	25%	0%
Catchment expenditure capture										
Primary	90.0%	90.0%	15.0%	20.0%	15.0%	50.0%	40.0%	20.0%	70.0%	90.0%
Secondary	67.5%	67.5%	11.3%	15.0%	11.3%	37.5%	30.0%	15.0%	52.5%	67.5%

Source: TSA Management

6.4.3 Net catchment expenditures – Mount Compass

Taking into consideration expenditure leakage, total catchment expenditures made within Mount Compass across the retail categories are shown below.

Table 36. Total population catchment expenditure in 2021, net of expenditure leakage (\$m) – Mount Compass



	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Tobacco	Alcohol on licenced premises	TOTAL
Primary	\$4.97	\$0.70	\$0.22	\$0.13	\$0.18	\$0.32	\$0.35	\$0.11	\$0.41	\$0.21	\$7.59
Secondary	\$2.36	\$0.36	\$0.12	\$0.07	\$0.10	\$0.16	\$0.19	\$0.06	\$0.20	\$0.13	\$3.74
TOTAL	\$7.33	\$1.06	\$0.35	\$0.20	\$0.28	\$0.48	\$0.54	\$0.16	\$0.61	\$0.34	\$11.33

6.4.4 Tourist expenditures – Mount Compass

Mount Compass is less important as a tourist destination than other towns within Alexandrina, so local tourist expenditures are estimated to be lower.

Table 37. Tourist expenditures in 2021 (\$m) – Mount Compass

Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
\$0.21	\$0.16	\$0.79	\$0.05	\$0.03	\$0.05	\$0.26	\$0.08	\$0.05	\$0.03	\$1.71

Source: TSA Management

6.4.5 Total turnover – Mount Compass

Combining the tables shown in sections 6.2.3 and 6.2.4, we arrive at a total retail turnover estimate by category for Mount Compass. These estimates are shown in the table below.

Table 38. Total retail turnover in 2021 (\$m) – Mount Compass

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Tobacco	Alcohol on licenced premises	TOTAL
Residents	\$7.33	\$1.06	\$0.35	\$0.20	\$0.28	\$0.48	\$0.54	\$0.16	\$0.61	\$0.34	\$11.33
Tourists	\$0.21	\$0.16	\$0.79	\$0.05	\$0.03	\$0.05	\$0.26	\$0.08	\$0.05	\$0.03	\$1.71
TOTAL	\$ 7.54	\$ 1.22	\$ 1.14	\$ 0.25	\$ 0.30	\$ 0.53	\$ 0.80	\$ 0.24	\$ 0.66	\$ 0.37	\$ 13.04

Source: TSA Management

6.4.6 Retail turnover densities – Mount Compass

Retail turnover densities (RTDs) are measures of the productivity of floor space. These vary, with some retail floor space categories generally far more productive than others. There is also variation within categories across centres, with floor space productivity for a particular type of retail varying as a result of a range of local factors, including the size of the centre in which the store is located, centre quality, and catchment population size and wealth.

We apply the following RTDs as measures of floor space productivity within Mount Compass' retail centres.

Table 39. Retail turnover densities – Mount Compass



Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises
\$9,500	\$12,000	\$7,000	\$3,000	\$4,000	\$3,500	\$4,000	\$4,500	\$1,000

6.4.7 Floor space estimates – Mount Compass

Dividing the category expenditures set out in section 6.2.5 with the RTDs shown in 6.2.6, it is estimated that there is current demand for just under 2,000 sqm of retail floor space in Mount Compass.

Table 40. Total floor space demand in 2021 (sgm) – Mount Compass

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises	TOTAL
TOTAL	794	101	163	83	75	152	199	53	367	1,987

Source: TSA Management

6.5 Current retail floor space demand - Port Elliot

Drawing on disaggregated retail expenditure data, we have estimated the amount of retail expenditure across the Port Elliot catchments across each of the retail categories in 2021. With parts of coastal Alexandrina (including Port Elliot) having a significant visitor economy, the impact of expenditure linked to non-residents is significant, and is modelled and presented separately.



6.5.1 Total catchment expenditure – Port Elliot

The population of the Port Elliot catchment is estimated to generate around \$51 million in retail expenditures across all categories. These *gross* retail expenditure figures are set out below.

Table 41. Total population catchment expenditure in 2021 (\$m) – Port Elliot

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Primary	\$14.73	\$1.84	\$3.79	\$2.12	\$4.03	\$1.86	\$3.61	\$1.52	\$1.76	\$0.57	\$35.83
Secondary	\$5.16	\$0.76	\$1.48	\$0.85	\$1.59	\$0.69	\$1.33	\$0.54	\$0.54	\$0.21	\$13.15
TOTAL	\$19.89	\$2.60	\$5.27	\$2.96	\$5.62	\$2.55	\$4.95	\$2.05	\$2.30	\$0.78	\$48.98

Source: TSA Management



6.5.2 Expenditure leakage - Port Elliot

A share of these expenditures is likely to leak out of the retail system due to expenditure in other centres and online. This share varies across retail categories and is set out in the table below. Online expenditures are assumed by the model to grow over time, as online retailing becomes more common.

Table 42. Expenditure losses from the retail system in 2021, assumptions – Port Elliot

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises
Online expenditure leakage										
	2%	10%	7%	30%	30%	6%	20%	5%	25%	0%
Catchment expenditure capture										
Primary	42.5%	60.0%	90.0%	20.0%	22.5%	0.0%	20.0%	60.0%	70.0%	90.0%
Secondary	28.3%	40.0%	60.0%	13.3%	15.0%	0.0%	13.3%	40.0%	46.7%	60.0%

Source: TSA Management

6.5.3 Net catchment expenditures - Port Elliot

Taking into consideration expenditure leakage, total catchment expenditures made within Port Elliot across the retail categories are shown below. The table reveals that catchment residents contribute an estimated \$17 million in expenditure to Port Elliot's retail businesses.

Table 43. Total population catchment expenditure in 2021, net of expenditure leakage (\$m) – Port Elliot

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail	Товассо	Alcohol on licenced premises	TOTAL
Primary	\$5.95	\$0.99	\$3.16	\$0.30	\$0.64	\$-	\$0.54	\$0.86	\$0.93	\$0.51	\$13.87
Secondary	\$1.39	\$0.27	\$0.82	\$0.08	\$0.17	\$-	\$0.13	\$0.20	\$0.19	\$0.13	\$3.38
TOTAL	\$7.34	\$1.27	\$3.98	\$0.38	\$0.80	\$-	\$0.68	\$1.07	\$1.11	\$0.64	\$17.26

Source: TSA Management



6.5.4 Tourist expenditures - Port Elliot

Port Elliot has a significant visitor economy, so therefore, expenditures linked to tourist visitation are relatively high, at around \$11 million.

Table 44. Tourist expenditures in 2021 (\$m) - Port Elliot

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Tourist expenditure	\$1.60	\$0.91	\$4.04	\$0.38	\$0.19	\$0.38	\$1.92	\$0.58	\$0.38	\$0.23	\$10.62

Source: TSA Management

6.5.5 Total turnover - Port Elliot

Combining the tables shown in sections 6.2.3 and 6.2.4, we arrive at a total retail turnover estimate by category for Port Elliot. The table below estimates annual retail expenditures at around \$28 million per annum.

Table 45. Total retail turnover in 2021 (\$m) – Port Elliot

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Residents	\$7.34	\$1.27	\$3.98	\$0.38	\$0.80	\$-	\$0.68	\$1.07	\$1.11	\$0.64	\$17.26
Tourists	\$1.60	\$0.91	\$4.04	\$0.38	\$0.19	\$0.38	\$1.92	\$0.58	\$0.38	\$0.23	\$10.62
TOTAL	\$8.94	\$2.18	\$8.02	\$0.76	\$0.99	\$0.38	\$2.59	\$1.64	\$1.50	\$0.87	\$27.88

Source: TSA Management

6.5.6 Retail turnover densities

Retail turnover densities (RTDs) are measures of the productivity of floor space. These vary, with some retail floor space categories generally far more productive than others. There is also variation within categories across centres, with floor space productivity for a particular type of retail varying as a result of a range of local factors, including the size of the centre in which the store is located, centre quality, and catchment population size and wealth.

We apply the following RTDs as measures of floor space productivity within Port Elliot's retail centres.

Table 46. Retail turnover densities – Port Elliot

Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises
\$11,000	\$20,000	\$7,500	\$4,000	\$4,000	\$4,000	\$5,500	\$2,750	\$1,000

Source: TSA Management



6.5.7 Floor space estimates

Dividing the category expenditures set out in section 6.2.5 with the RTDs shown in 6.2.6, we estimate that there is current demand for just under 4,500 sqm of floor space in Port Elliot.

Table 47. Total floor space demand in 2021 (sqm) – Port Elliot

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises	TOTAL
Primary	813	109	1,069	190	248	96	471	598	870	4,463

Source: TSA Management

6.6 Current retail floor space demand – Strathalbyn

Drawing on disaggregated retail expenditure data, we have estimated the amount of retail expenditure across the Strathalbyn catchments across each of the retail categories in 2021. With parts of Alexandrina having a significant visitor economy, the impact of expenditure linked to non-residents is significant, and is modelled and presented separately.



6.6.1 Total catchment expenditure - Strathalbyn

The population of the Strathalbyn catchment is estimated to generate around \$158 million in retail expenditures across all categories. These *gross* retail expenditure figures are set out below.

Table 48. Total population catchment expenditure in 2021 (\$m) – Strathalbyn

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Primary	\$31.72	\$4.42	\$8.68	\$5.12	\$8.86	\$3.88	\$6.96	\$2.88	\$3.98	\$1.25	\$77.75
Secondary	\$31.32	\$4.92	\$9.25	\$5.40	\$9.10	\$4.31	\$6.94	\$2.86	\$4.28	\$1.47	\$79.86
TOTAL	\$63.04	\$9.33	\$17.94	\$10.52	\$17.95	\$8.19	\$13.90	\$5.74	\$8.26	\$2.73	\$157.61

Source: TSA Management

6.6.2 Expenditure leakage – Strathalbyn

A share of these expenditures is likely to leak out of the retail system due to expenditure in other centres and online. This share varies across retail categories and is set out in the table below. Online expenditures are assumed by the model to grow over time, as online retailing becomes more common.



Table 49. Expenditure losses from the retail system in 2021, assumptions – Strathalbyn

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises
Online expenditure leakage	2%	10%	7%	30%	30%	6%	20%	5%	25%	0%
Catchment expenditure capture										
Primary	80.0%	80.0%	80.0%	42.5%	32.5%	50.0%	50.0%	70.0%	80.0%	80.0%
Secondary	53.3%	53.3%	53.3%	28.3%	21.7%	33.3%	33.3%	46.7%	53.3%	53.3%

6.6.3 Net catchment expenditures – Strathalbyn

Taking into consideration expenditure leakage, total catchment expenditures made within Strathalbyn across the retail categories are shown below.

Table 50. Total population catchment expenditure in 2021, net of expenditure leakage (\$m) – Strathalbyn

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Tobacco	Alcohol on licenced premises	TOTAL
Primary	\$24.11	\$3.18	\$6.43	\$1.52	\$2.01	\$1.55	\$2.61	\$1.91	\$2.39	\$1.00	\$46.72
Secondary	\$15.87	\$2.36	\$4.57	\$1.07	\$1.38	\$1.15	\$1.73	\$1.27	\$1.71	\$0.79	\$31.90
TOTAL	\$39.97	\$5.54	\$10.99	\$2.59	\$3.39	\$2.70	\$4.34	\$3.18	\$4.10	\$1.79	\$78.62

Source: TSA Management

6.6.4 Tourist expenditures – Strathalbyn

Strathalbyn has a significant visitor economy, so therefore, expenditures linked to tourist visitation are significant.

Table 51. Tourist expenditures in 2021 (\$m) – Strathalbyn

Tourist expenditure	\$1.60	\$0.91	\$4.68	\$0.38	\$0.19	\$0.38	\$1.92	Retail 85.0\$	\$0.38	\$0.23	\$11.25
	Food and groceries	ottleshop	Restaurants, cafes and takeaway	Clothing and shoes	niture and nitegoods	dware and garden	her retail	ail services	Товассо	Alcohol on licenced premises	тотаг

Source: TSA Management



6.6.5 Total turnover - Strathalbyn

Combining the tables shown in sections 6.2.3 and 6.2.4, we arrive at a total retail turnover estimate by category for Strathalbyn. These estimates are shown in the table below.

Table 52. Total retail turnover in 2021 (\$m) – Strathalbyn

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Товассо	Alcohol on licenced premises	TOTAL
Residents	\$39.97	\$5.54	\$10.99	\$2.59	\$3.39	\$2.70	\$4.34	\$3.18	\$4.10	\$1.79	\$78.62
Tourists	\$1.60	\$0.91	\$4.68	\$0.38	\$0.19	\$0.38	\$1.92	\$0.58	\$0.38	\$0.23	\$11.25
TOTAL	\$41.58	\$6.45	\$15.67	\$2.98	\$3.59	\$3.09	\$6.26	\$3.76	\$4.49	\$2.02	\$89.87

Source: TSA Management

6.6.6 Retail turnover densities - Strathalbyn

Retail turnover densities (RTDs) are measures of the productivity of floor space. These vary, with some retail floor space categories generally far more productive than others. There is also variation within categories across centres, with floor space productivity for a particular type of retail varying as a result of a range of local factors, including the size of the centre in which the store is located, centre quality, and catchment population size and wealth.

We apply the following RTDs as measures of floor space productivity within Strathalbyn's retail centres.

Table 53. Retail turnover densities – Strathalbyn

Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises
\$13,000	\$24,000	\$8,000	\$5,000	\$4,500	\$4,000	\$6,000	\$4,750	\$1,250

Source: TSA Management

6.6.7 Floor space estimates – Strathalbyn

Dividing the category expenditures set out in section 6.2.5 with the RTDs shown in 6.2.6, it is possible to arrive at an estimate of current demand for floor space within Strathalbyn.

Table 54. Total floor space demand in 2021 (sqm) – Strathalbyn

	Food and groceries	Bottleshop	Restaurants, cafes and takeaway	Clothing and shoes	Furniture and whitegoods	Hardware and garden	Other retail	Retail services	Alcohol on licenced premises	TOTAL
TOTAL	3,198	269	1,959	596	797	772	1,044	791	1,614	11,039

Source: TSA Management

7. Demand and supply alignment

This section aligns the demand and supply projections set out in the previous chapters to establish a baseline where current demand reflects current supply. This alignment allows for identification of existing imbalances in supply and demand, and supports the development of projections that show how the evolving regional economy, increased wealth, changes in population and growing tourist visitation are likely to translate to changes in demand for productive economy land.

The section below will align demand and supply of land across employment and town centre categories.

Employment land analysis is carried out at the subregional level (inland and coastal Alexandrina), recognising the differences between these two parts of the LGA. The town centre floor space analysis is carried out at the township level, with floor space gaps provided across the five townships.

7.1 Natural vacancy rates in the market for land

In markets for a range of goods and services, there are situations where equilibrium conditions are met despite supply being significantly greater than demand. These situations occur when the goods to which the market relates are not completely identical or substitutable. In these scenarios, *frictional vacancies* emerge, with unutilised units of supply not meeting the specific needs of prospective groups of purchasers.

A commonly cited example of these relates to the markets for labour, where the *natural rate of unemployment* is regarded by most economics to be around 4%. Once unemployment declines below this point, the shallower pool of skilled labour presents a challenge in terms of appropriately matching workers to roles, with a range of economic costs resulting. For this reason, 4% is adopted as a soft target by policy makers.

With employment land, the natural vacancy rate is generally regarded to be around 10%. This means that once 90% of a precinct is occupied, the market can be regarded as being close to equilibrium, with the likelihood that prospective entrants are unable to find land with the specific attributes (location, scale, road access, etc) necessary for viability. As with labour markets, failure to deliver new employment land to market under these circumstances leads to poor economic efficiency outcomes, with the growth of the regional economy constrained.

7.2 Employment land area

7.2.1 Inland Alexandrina

The following chart compares demand with supply across inland Alexandrina. It reveals anticipated take-up of employment land between 2021 and 2026 of around 39,000sqm, and around 190,000 sqm by 2041.

With an estimated 370,000 sqm of unoccupied and unconstrained employment lands in and around the townships of Strathalbyn and Mount Compass, the modelling indicates that there is more than enough supply to accommodate forecast growth to 2041.





Figure 14. Employment land demand and supply, Inland Alexandrina

Looking at the breakdown of the provision gap by sector, the figure below shows that the increase in demand for employment land floor space will be driven largely by a mix of manufacturing, urban services and freight and logistics.

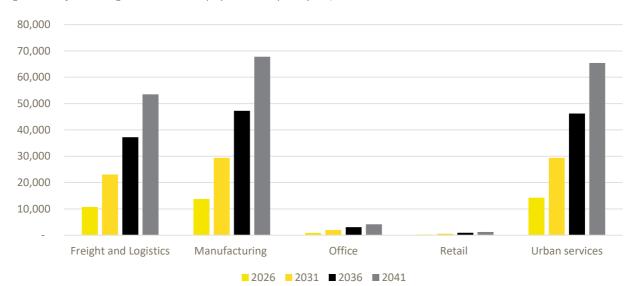


Figure 15. Projected change in demand for employment floor space by BLU, Inland Alexandrina

Source: TSA Management

7.2.2 Coastal Alexandrina

Analysis of demand and supply of employment land in Coastal Alexandrina shows that, considering the *natural vacancy rate* (see section 7.1), the employment land market across Coastal Alexandrina is at (or close to) equilibrium. With the demand for employment land anticipated to grow in line with the population of the region, to support the growth of the regional economy it is important that new employment lands be made available in the near term.



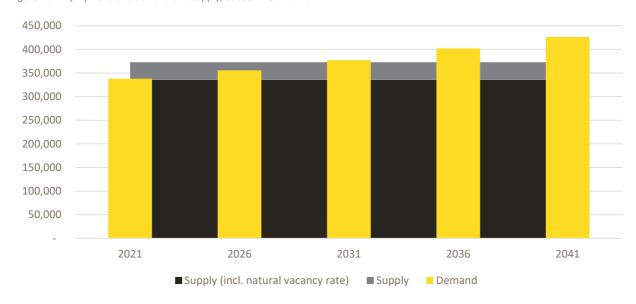


Figure 16. Employment land demand and supply, Coastal Alexandrina

Breaking down the growth in demand for employment land by BLU, the projections show that urban services are expected to drive growth for employment land across Alexandrina, with this category of uses responsible for more than 70% of growth in employment land to 2041.

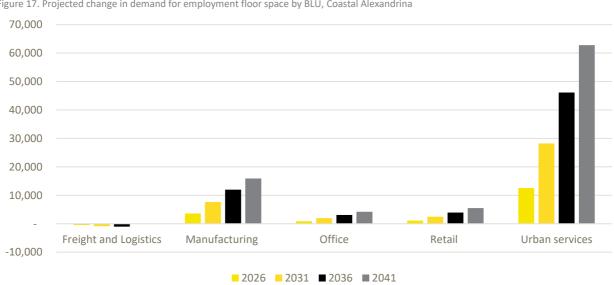


Figure 17. Projected change in demand for employment floor space by BLU, Coastal Alexandrina

Source: TSA Management

Town centre floor space

This section sets out anticipated growth in employment floor space across the five centres, with these projections broken down by retail category.



7.3.1 Goolwa

The chart shows that, by 2041, an additional 11,400 sqm of floor space is expected to be required in Goolwa, with *food and groceries* and *hospitality* the key drivers of growth.

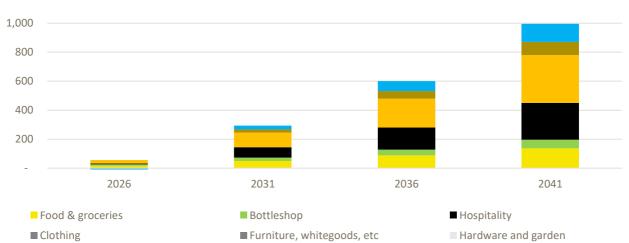
12,000 10,000 8,000 6,000 4,000 2,000 2026 2031 2036 2041 Food & groceries ■ Bottleshop ■ Hospitality ■ Clothing ■ Furniture, whitegoods, etc ■ Hardware and garden Other retail ■ Retail services Alcohol on licenced premises

Figure 18. Projected change in demand for town centre floor space by retail subcategory, Goolwa

Source: TSA Management

7.3.2 Middleton

Middleton has the smallest projected increase in demand as measured by retail floor space, with an additional 1,000 sqm demanded by 2041. *Other retail* and *hospitality* are expected to be the key growth drivers. An important feature of the modelling is that it reflects existing supply and assumes a continuation of demand patterns. With respect to Middleton, the modelling therefore assumes that residents will continue to travel to nearby towns for their retail needs, and that the existing relatively limited retail offer will not substantially change.



■ Retail services

Figure 19. Projected change in demand for town centre floor space by retail subcategory, Middleton

Source: TSA Management

Other retail

Best for Project 67

■ Alcohol on licenced premises



7.3.3 Mount Compass

With a relatively limited tourist economy, the modelling indicates that population growth will be the primary driver of demand for floorspace at Mount Compass, accounting for nearly half of total demand for new retail floor space. In total, just over 900 sqm of additional floor space is expected to be needed by 2041.

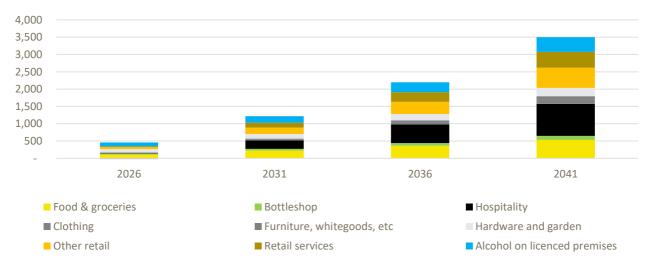
1,000 800 600 400 200 2026 2031 2036 2041 Food & groceries Bottleshop ■ Hospitality ■ Clothing ■ Furniture, whitegoods, etc ■ Hardware and garden Other retail ■ Retail services ■ Alcohol on licenced premises

Figure 20. Projected change in demand for town centre floor space by retail subcategory, Mount Compass

Source: TSA Management

7.3.4 Port Elliot

Port Elliot is expected to require significant additions to its floor space, with a need for an estimated 3,500 sqm across all retail categories by 2041. This growth in demand assumes strong growth in the regional population, tourist visitation and a continuation of its role as a retail centre for residents of (and visitors to) Middleton.



 $Figure\ 21.\ Projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ by\ retail\ subcategory,\ Port\ Elliot\ projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ by\ retail\ subcategory,\ Port\ Elliot\ projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ by\ retail\ subcategory,\ Port\ Elliot\ projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ by\ retail\ subcategory,\ Port\ Elliot\ projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ by\ retail\ subcategory,\ Port\ Elliot\ projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ projected\ change\ in\ demand\ for\ town\ centre\ floor\ space\ projected\ floor\ floor\$

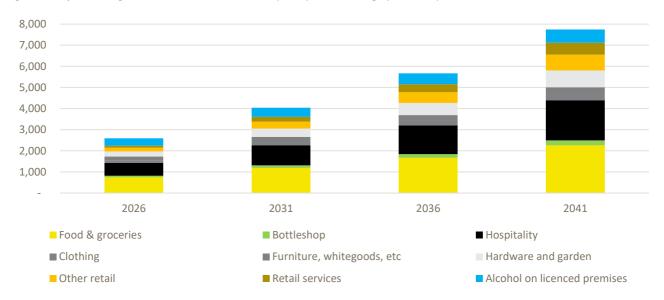
Source: TSA Management



7.3.5 Strathalbyn

It is anticipated that an additional 7,700 sqm of floor space will be required at Strathalbyn, with growth in demand driven primarily by an increasing catchment population. Growth in demand will be highest in the *food and grocery* and *hospitality* categories.

Figure 22. Projected change in demand for town centre floor space by retail subcategory, Strathalbyn





8. Summary and strategic responses

Based on the preceding modelling and analysis, this section sets out and describes the key issues faced in relation to productive economy land (both town centres and employment lands) across the five townships. Associated with these key issues, a set of recommended strategic responses is also compiled for each of the land categories across the five townships.

8.1 Goolwa

8.1.1 Employment lands

Key issues related to Goolwa's employment lands are set out and described below.

Employment lands effectively at capacity

The Goolwa analysis, and the supply and demand alignment for Coastal Alexandrina confirms that employment lands within Goolwa are at, or close to, capacity. Whilst there are some vacancies across Goolwa's two precincts, the share of land that is vacant is at what is generally regarded to be the *natural vacancy rate* for employment precincts. This means that for prospective new entrants to the town's employment lands, limited choice makes it less likely a lot with appropriate size, access, and other characteristics will be found.



With demand projected to grow over the next two decades, it is critical that new employment lands be made available in the vicinity to Goolwa to support

regional economic productivity, and to ensure that regional economic development opportunities are captured.

- Existing employment precincts are heavily constrained.
- New precinct to the west of town will alleviate these pressures.

Council has previously identified a candidate expansion for expansion of the region's employment lands (see inset), though it is understood that the land in question is no longer suitable for these types of activities. However, to the immediate west of this land and the existing SE zone, there is a significant area of Deferred Urban land that is still available for potential expansion.

Potential for conflict between employment lands and sensitive uses

The location of Goolwa's employment lands in relation to sensitive uses (such as retail and housing) presents a challenge.

Firstly, in relation to the EZ land, visually unattractive (but economically important) employment land uses adjacent to the Goolwa Shopping Centre adversely impacts the amenity of that precinct, potentially depressing centre land values and inhibiting redevelopment or greater intensity of use. With Hutchinson Street the main entry point to the town from the west, the present mix of auto servicing and other businesses presents a sub-standard gateway. Lastly, given property values, houses in the south of the precinct are unlikely to be turned over to employment uses – particularly given the irregular configuration of lots caused by the rail line which bisects the precinct, and the poor road access to the south. The presence of these dwellings (as well as those to the east of the precinct) realistically limits the range of activities that can occur on this EZ land.

The SEZ land is a high-quality employment precinct, within which there is evidently strong demand for land. That said, rezoning the eastern edge to a less impactful zone (though retaining its employment land function) would reduce the risk of land use conflict along that edge of the precinct, so long as the new zone remains congruent with the mix of already established uses.



Lack of variety in employment land offer

The region's employment lands are presently dominated by relatively small lots. Although the *urban service* focus of employment lands in this part of Alexandrina is likely a reflection of the local economy, the lack of larger scale uses (freight and logistics and manufacturing) may also be associated with a lack of appropriate sites.

Strategic options

- 1. Continue investigations into potential location for new employment lands to the west of the SEZ precinct, ensuring that the precinct is well buffered from sensitive uses, and configured with a mix of lots sizes.
- 2. Investigate options for internal road links between the new precinct and the existing SEZ land, noting the challenges given the configuration of roads within the latter precinct.
- 3. Investigate the viability of a change in focus of the EZ land to *bulky goods/ large format retail*. This sort of use would reflect the benefits of a higher amenity precinct in a prominent location surrounded by sensitive uses. This may include development of a precinct brand and prospectus, public realm investment, and proactive approaches to the market.
- 4. Consider amendments to zoning as identified above.

8.1.2 Town and activity centres

Key issues related to Goolwa's activity centre lands are set out and described below.

Strong demand for new retail floor space

use of centre land.

Modelling indicates that there is a need for more than 11,000 sqm of retail floor space (approximately a doubling of existing floor space) by 2041. There is a challenge in delivering this floor space given the need to retain the prominence of Cadell Street and the Goolwa Shopping Centre as the commercial and social focal points of the township.

There are several options open to Council in addressing this supply challenge, none of which are mutually exclusive. These include:

- Support for a new centre in the growing area to the north of Goolwa. Any new centre should have a convenience focus and be small enough that it remains subordinate to the existing centre (no more than 2,000sqm, with a small supermarket.)
- Support the transition of the EZ land to bulky goods/ large format retail precinct (as discussed in section 8.1.1). As well as providing new retail opportunities within the town, this would also improve visual amenity at the Goolwa Shopping Centre, potentially supporting more intensive
- As discussed in section 8.2.1, support a significant expansion of floor space in Middleton. This would reduce floor space demand by lessening the reliance of Middleton and Port Elliot residents on Goolwa's centres.
- Consider options for public realm improvements along Cadell Street
 which has potential to provide substantial opportunities for high
 quality hospitality spaces. Possibilities include investments in footpath
 widening, weather protection, and active transport networks (see inset for example Coogee, NSW).

Strategic options

- 1. Consider potential locations for a future small northern convenience centre in light of anticipated growth.
- 2. Carry out investigations regarding the viability of a bulky goods/ large format retail centre at the EZ land to the east of the Goolwa Shopping Centre.



3. Continue to engage with key stakeholders to consider opportunities for public realm improvements along Cadell Street.

8.2 Middleton

8.2.1 Town and activity centres

Key issues related to Middleton's employment lands are set out and described below.

Limited growth in demand for floor space assuming a continuation of present trade patterns

Middleton is the smallest township in the region, so as a result – despite rapid projected population growth – the emerging floor space gap to 2041 is expected to be relatively moderate, with just under 1,000 sqm of additional floor space needed, mostly in the categories of *hospitality* and *other retail*.

In interpreting these projections, it is important to recognise that they assume that existing trade patterns (i.e., Middleton residents traveling to Goolwa and Port Elliot for shopping) endure, and that the scale of supply in Middleton relative to nearby centres remains the same.

At present, land within the town centre is not used intensively, so some new floor space may come about as a result of the reconfiguration of existing centre buildings. There is potential therefore to retain the existing Township Activity Centre Zone (TACZ) and rely on market forces to drive up land values and facilitate greater intensity of use.

Land releases to the west of the existing township

The Middleton Master Plan sets out land to the north and south of Port Elliot Road, presently zoned Deferred Urban (DUZ), as future township extension. With land to the north-west of the corner of Port Elliot and Ocean Roads to be developed, there is an opportunity to extend the existing Middleton centre to the west (see inset, from the Middleton Master Plan). Given the need to accommodate new floor space at Middleton over the next few decades, it will be important to ensure that provision is made for commercial floor space on the north-western corner of Port Elliot and Ocean Roads.

Broadly speaking, Council has two options in regard to commercial land in this location:

- Option 1: to meet projected demand and support an expansion of around 1,000 sqm, maintaining Middleton's subordinate status in relation to large centres at Goolwa and Port Elliot, and
- Option 2: to provide floor space in excess of the projected gap (up to 4,000sqm, including a mid-large supermarket), recognising challenges in delivering new floor space at Port Elliot, and the significant opportunity to increase the share of expenditure captured from local residents.

Potential advantages and disadvantages of each of these options are identified and described in the table below.





Table 55. Option analysis in relation to Middleton town centre

Option	Advantages	Disadvantages
0.11	 Would uphold the present coastal Alexandrina centre hierarchy. 	 The establishment of new floor space at Port Elliot is far from certain, so could be a missed opportunity to
Option 1	 Would assist in building pressure for new retail floor space in the Port Elliot centre. 	deliver a sustainable supply of floor space to the Middleton/ Port Elliot region.
	- Likely to reduce the reliance of Middleton residents	- Would significantly reduce the likelihood of
	and visitors on Goolwa other towns, helping to resolve supply challenges at Goolwa by slowing growth in demand for new floor space.	 significant new retail development in Port Elliot. By drawing expenditure away, may have adverse impacts on the Port Elliot centre and retailers.
Option 2	 Local provision of floor space likely to mean a reduction in vehicle trips. 	 May ultimately lead to the Port Elliot becoming subordinate to Middleton in the centre hierarchy,
	 Would support the establishment of more sustainable community in Middleton and Port Elliot, potentially supporting the appeal of the towns to permanent residents. 	despite having a significantly larger population.

In our view, Option 2 represents the best course of action. Although it proposes floor space in excess of projected demand, these projections are based the present supply situation, with an assumption that the bulk of Middleton resident/ visitor expenditures are made in Goolwa or Port Elliot, and that few residents from outside of Middleton spend within the township.

With demand shaped heavily by supply factors, new floor space at Middleton has the potential to reshape the dynamics of the coastal Alexandrina retail system, in the longer term potentially elevating Middleton above Port Elliot in the regional centre hierarchy.

It would also resolve centre floor space supply challenges at Goolwa and Port Elliot (see sections 8.1.2 and 8.4.2)

Whilst it is likely to result in Port Elliot residents driving further for retail and service needs, the towns remain close, with most parts of Port Elliot less than five minutes by car from the Middleton centre.

Strategic responses

- 1. Ensure that appropriate steps are taken to ensure new centre floor space is incorporated as part of the westward expansion of the Middleton township.
- 2. Carry out detailed retail impact assessments to determine the impact of a new centre (of various sizes) at Middleton on residents of Port Elliot and Goolwa. Engage with affected communities.



8.3 Mount Compass

8.3.1 Employment lands

Key issues related to Mount Compass's employment lands are set out and described below.

Land use within Mount Compass' employment lands is presently used inefficiently

Land in the Mount Compass precinct is presently used inefficiently, with low building footprint-to-plot ratios. It is possible that this reflects low demand for employment land in the region. The other *Inland Alexandrina* precinct is also used inefficiently – in stark contrast to the densely-occupied employment land precincts in the southern areas of the LGA.

Significant constraints to development in the southern portion of the precinct

Land is theoretically available in the south of the precinct, though for several reasons, use of these 'vacant' lots for traditional employment land uses is unlikely in coming years for a number of reasons, these being:

- the existence of native vegetation, which would be costly to clear, and
- the existence of several dwellings. Significantly 'improved' land means substantial acquisition costs for
 potential residents, while investing in employment land businesses in close proximity to sensitive uses
 represents a risk.

Precinct effectively at or near capacity

Ignoring that present usage of many parts of the precinct is inefficient, the precinct is at or close to capacity. Noting that demand for employment land across Inland Alexandrina is expected to grow significantly, it is important to understand the extent to which vacant land at Strathalbyn (or Victor Harbor, Willunga, etc) represents a viable alternative for prospective businesses, and whether additions to the stock of employment land are necessary.

Strategic responses

1. Engage with the local business community on the employment land situation in Mount Compass to understand issues supply and demand issues relating to the use of (and demand for) employment land.

8.3.2 Town centre

Key issues related to Mount Compass's town centre land is set out and described below.

Moderate growth driving demand for new floor space within the Mount Compass Centre

Projections estimate demand for approximately 900 sqm of town centre floor space by 2041. With most of this demand driven by population growth, food and groceries (around 400sqm) is the largest contributor. Given the low density nature of the centre, additional floor spaces are likely to be achievable through more intensive use of existing town centre land.

Strategic responses

1. Work with local landowners and businesses to facilitate greater intensity of land use within the town centre.



8.4 Port Elliot

8.4.1 Employment lands

Key issues related to Port Elliot's employment lands are set out and described below.

Significant land use conflicts emerging

Employment lands at Port Elliot are the most eclectic in Alexandrina, with a mix of retail, services, manufacturing, storage, office and hospitality businesses. It is understood that the community values the existing uses of the Hill Street precinct that would conventionally not be seen in employment lands.

The Port Elliot Master Plan proposes a set of interventions at the northern end of Hill Street that seek to recast it as a de facto activity centre (see inset). Proposed changes include bicycle links and public realm improvements. These changes conflict with the stated purpose of the Strategic Employment Zone, which is to accommodate 'a range of industrial, logistical, warehousing, storage, research and training land uses together with *compatible* (TSA italics) business activities generating wealth and employment for the state'.



In the same way residential and commercial zones seek to protect sensitive forms of land use from the encroachment of *externality-generating* uses, an important function of employment zones (such as the SEZ) is to protect economically important industrial, freight, and urban service businesses from the encroachment of sensitive uses. At present, the growing presence of hospitality, retail, and personal service businesses in the northern part of Hill Street undermines the appeal of the precinct for businesses likely to generate noise, heavy vehicle movements, odours, and dust.

Further, the encroachment of relatively high-value land uses into the precinct drives up land values and dissuades investment from the sorts of businesses that would ordinarily locate in an SEZ.

Council has identified Waterport Road as a future freight route providing a heavy vehicle link between Victor Harbor and Goolwa. The presence of sensitive uses on employment lands along this route represents a risk to the ultimate delivery of the project, as well as a lost opportunity (for businesses that would benefit from direct access to heavy vehicle corridor).

Understanding community perspectives is important. For example, why have businesses chosen to locate here rather than in the town centre, and how (or whether) they gained planning approval to do so. From the perspective of other precinct users, what conflicts do they see emerging on Hill Street, and how are these conflicts likely to impact future business activities, investment decisions, etc.

Ultimately, one of the key functions of a land use planning framework is to provide certainty for current and prospective businesses, and the broader community. As it stands, the conflict between the purposes of the zone and current land use is something that needs to be resolved.

Precinct close to capacity

The precinct is close to full capacity, with a small number of vacant lots in the southern part of the precinct. With an estimated 87% of the precinct occupied, the precinct is close to capacity. Given the proximity of employment precincts to the east (less than kms to the west in Hindmarsh Valley), or to the west in Goolwa, there is potential for future regional employment land needs to be addressed in alternate locations in the near term.

Strategic responses



- 1. Devise a clear and unambiguous strategic direction for the Hill Street precinct in consultation with key stakeholders and community members. As part of this process, ensure that these groups are exposed to multiple perspectives, and guided by a clear understanding of the issues at play. At the conclusion of this process, ensure that the precinct strategy is adequately supported by policy.
- 2. Undertake an investigation to understand how the existing situation was allowed to occur and set in place structures and processes to ensure that similar issues don't emerge elsewhere in the LGA.
- 3. Depending on the outcomes of 1., investigate options for new/ expanded employment land in the vicinity of Port Elliot.

8.4.2 Town centre

Key issues related to Port Elliot's town centre land is set out and described below.

Growth in regional population and visitation to drive demand for centre floor space

Driven by tourism and growing resident population, around 3,500sqm of new centre floor space likely to be needed at Port Elliot. Around 30% of this demand is linked to hospitality. There are special requirements regarding the desired character of new centre spaces, with a need to support a high-quality public realm. There are several options available to Council in delivering new floor space to service the needs of Port Elliot residents and visitors.

Challenges with delivery of new floor space in existing town centre

There is a significant quantity of land in the town centre zoned for Township Main Street Zone (TMSZ), on which new retail floor space would theoretically be permissible. However, with the price of regional housing at record levels it is uncertain whether an economic incentive to turn the land over to commercial uses will emerge in the near term.

Figure 23. Examples of TMSZ land in the Port Elliot centre



There are several interventions that might be considered by Council in fostering the conversion of dwellings on TMSZ land to commercial buildings. These potentially include the development of multi-storey buildings to drive development feasibilities, local government intervention in the purchase of land on market, and investments in public realm.

At present, 'overflow' from the town centre may be playing in a role in the emergence of a 'second centre' at Hill Street. Although it appears the community values this Hill Street 'centre', its emergence on SEZ land is problematic, as discussed above.

There is deferred urban land in the northern part of Port Elliot (see inset) on which there is potential for future urban development. It is possible that this land accommodates some retail floor space in addition to new dwellings, absorbing some of the new demand for floor space in the centre. Critically, any new floor space would need to be highly limited in scale, and subservient to the existing centre.

There are therefore three distinct strategic options available to Council as they seek to accommodate new resident and tourist expenditures and demand for floor space. To summarise, these are:





- Option 1: Maintenance of existing strategy as reflected in TMSZ zoning, with retail/ hospitality discouraged at Hill Street,
- Option 2: Formalisation of the Hill Street 'centre' as a part of the centre network, and
- Option 3: Establishment of a new convenience centre on deferred urban land in the north of the township.

Table 56. Port Elliot - summary of strategic options, including advantages and disadvantages

Option	Advantages	Disadvantages
Option 1	 Would maintain the primacy of the existing town centre within Port Elliot and the broader region. Would facilitate the eventual establishment of a town centre with a critical mass that appeals to high quality commercial businesses. Address leakage of expenditures away from the town centre that serve to reduce value of TMSZ land, reducing the potential to town centre expansion. Frees up employment lands for use by businesses who viability is linked to the availability of unencumbered employment land. By redirecting uses not aligned with existing strategy, would set a clear precedent in regional strategic planning. 	 To be effective would require commitment to a clear strategic approach. Even still, expansion of floor space at Port Elliot is somewhat out of Council's hands. In the absence of new floor space opportunities, may lead to a situation in which the town is critically underserved by retail floor space (though this situation may be somewhat offset by the addition of new floor space at Middleton). Potentially politically challenging, with Hill Street popular within the community.
Option 2	 Politically easy, with the centre apparently broadly supported by the community, Establishment of a unique precinct that represents a point of difference for the region. 	 Distorts market for employment land in Port Elliot, pricing out and reducing the economic competitiveness of traditional employment land businesses. Loss of productive capacity across the balance of employment land., particularly in the context of limited vacancy. Obvious conflicts between traditional employment land uses, and retail/ hospitality businesses, with businesses and their customers have contrasting amenity requirements. Potential to undermine the primacy of the town centre. Reduction of the potential for TMSZ land to transition to commercial uses. Increased Council and community costs associated with two centres, including traffic, duplication of infrastructure, etc. In an illogical location for a second centre, at the north-western corner of the town boundary.
Option 3	 Would guarantee delivery of new floor space in a way that doesn't impact the township employment lands. 	 Limited potential to address the supply gap, given it would need to be limited in size (<500 sqm) to ensure the town centre remains the principal centre. Even still, potential to undermine the primacy of the town centre.

Best for Project 77

Disincentivises the transition of TMSZ land to

commercial uses.



- Increased LG and community costs associated with two centres, including traffic, duplication of infrastructure, etc.
- Although better located than Hill Street, its location and road access challenges make it far from ideal as an option for new floor space.
- Increased Council and community costs associated with two centres, including traffic, duplication of infrastructure, etc.

In our view, given the significant impacts of retail and hospitality uses on Hill Street on the wider employment precinct, and given regional constraints in terms of the availability of employment land, Option 1 is optimal. That said, we acknowledge the political challenges associated with the relocation of valued businesses from the northern part of this precinct.

Regardless of the strategic option adopted, it is difficult to picture a scenario in which significant quantities of floor space are delivered within Port Elliot township. As discussed in 8.2.1. there is potential for a relatively large centre in Middleton to absorb a large share of floor space demand from the Port Elliot community.

Strategic responses

- 1. Develop a clear strategy in relation to future centre policy (see Table 56). This is critical to the future of the existing Port Elliot centre. This process may involve:
 - Formal socioeconomic analysis of different options, including identification of costs and benefits, their distribution across the community, and the trade-offs associated with each option.
 - Engagement with key community and stakeholder groups.
 - Undertaking development feasibility assessments for a range of different development types on TMSZ land at Port Elliot centre, determining the price points, building heights, and development configurations needed to support transition of land use at the town centre. Understanding the degree to which future development is feasible will be important in informing the ultimate centre strategy for Port Elliot and the broader region.
- 2. As described in section 8.4.1, determine a clear strategic direction in relation to Hill Street to ensure strategic alignment and provide certainty to regional stakeholders. This strategy will influence the first strategic direction.
- 3. As discussed in 8.2.1, carry out detailed retail impact assessments in relation to the addition of new floor space at Middleton. Ultimately, any new additions should address the floor space gap without undermining the vibrancy of the Port Elliot centre.



8.5 Strathalbyn

8.5.1 Employment lands

Key issues related to Strathalbyn's employment lands are set out and described below.

Significant growth in demand for employment land

Demand projections indicate that by 2041, an additional 190,000 sqm of employment land will be taken up, driven by a mix of urban services, manufacturing and freight and logistics uses. These land use types have very different requirements in terms of access to freight corridors, precinct amenity, separation from sensitive uses, lot size, access to utilities and more. As a result, in planning for the development of employment lands across Strathalbyn, a range of different locational options should be available to different prospective user groups.

Significant vacant supply of employment land

Strathalbyn has by far the greatest quantity of zoned employment land in the LGA, and the largest amount of unoccupied employment land.

There is an estimated 800,000 sqm of leasable employment land across Strathalbyn and Mount Compass (mostly in Strathalbyn) once supporting infrastructure (e.g., roads, footpaths, green space, etc.) has been delivered, with around 315,000 sqm presently occupied, and a further 110,000 sqm constrained from developing in the near term. It is estimated that by 2041, more than 185,000 sqm of unoccupied employment land will remain within the inland Alexandrina precincts, almost all of which is likely to be in Strathalbyn.

Council need to play a key role in planning for, and supporting the growth of Strathalbyn's employment lands

While there is significant availability of employment land in Strathalbyn in particularly investment in supporting infrastructure will be needed to facilitate expansion.

We understand that the owner of the former harness racing track is seeking to rezone a portion of the land to accommodate dwellings, with the western strip adjacent to Milnes Road remaining zoned for employment uses.

Other than this, there are no plans in place aimed at managing and coordinating development of Strathalbyn's employment lands or providing infrastructure in a methodical way. A lack of clear planning threatens to 'lock in' suboptimal land use configurations and outcomes. For example, the gradual development of relatively small lots along Forrest Road threatens to detract from the viability of vacant employment lands to the south. A situation like this has already emerged to the west of Milnes Road, where a swathe of employment land is left essentially unusable given lack of road access and proximity to sensitive uses.

Figure 24. Employment land comparison, Strathalbyn and Goolwa





Much of the employment land in Strathalbyn is inefficiently used, with low employment densities, a consequence of low land values. Investment in infrastructure is likely to increase land values and support more efficient use of land.



A significant portion of demand for employment land in inland Alexandrina will be driven by freight and logistics uses. These activities require access to (B-Double compatible) road networks, large lot formats, and isolation from sensitive uses. Ensuring these opportunities are made available in ways that do not detract from efforts to grow other sectors is critical.

Large number of employment land uses presently located in town centre

As discussed in section 8.5.2, a significant number of uses theoretically well-suited to employment lands are presently found in the town centre. Council has rezoned a number of these parcels to the Town Centre Zone to facilitate their transition to retail, service, and hospitality services (see next section).

The relocation of these businesses to the town's employment lands would resolve two problems. Firstly, land would be freed up in the central part of Strathalbyn for commercial uses and an initial demand base for employment lands to the south would be generated.

At present, an employment land location in the town SEZ or EZ land is unlikely to be appealing for many of these businesses which tend to locate in precincts with some amenity. At present, this is not offered within employment lands to the south of Strathalbyn.

Investment required in heavy vehicle road network

Manufacturing and freight and logistics uses will be important sources of demand for employment land demand across the Alexandrina. These uses in general rely upon access to heavy vehicle compliant roads, and efficient access to regional road networks. Current and prospective heavy vehicle users within Strathalbyn's employment lands are presently required to use either Parkers Avenue or Milnes Road, and South Terrace to access producer regions or the national highway network.

As activity within the precinct grows, these routes are likely to become increasingly inefficient, adding to travel times and undermining regional productivity. Increased heavy vehicle movements also represent a poor outcome for residents of the communities these routes pass through. Lastly, the impact of heavy vehicle movements on urban amenity is likely to mitigate against the establishment of retail and commercial activities on TACZ land either side of South Terrace.

Potential for Strathalbyn to serve as local circular economy hub

As noted in section 3.5, facilitating a transition to a circular economy will require long-term land use planning for collection and recycling facilities in employment lands. Strathalbyn's surplus of vacant employment lands that are distant from sensitive land uses, and its connection to local and regional transport networks, makes it the most viable candidate for establishment of a circular economy hub for Alexandrina.

While Strathalbyn presents the most viable option within Alexandrina, there are still barriers to the development of a circular economy hub. Some of these are existing challenges to greater development of the employment precinct, such as improving services and heavy vehicle access for the local lots. The most significant potential challenge will be the establishment of hubs at larger centres nearby. Because of their connections to the national freight network, any hubs established at Mount Barker or Murray Bridge are likely to be more efficient than could be established in Strathalbyn, and may preclude establishment of more than a small local hub.

Strategic responses

- 1. Given its relative proximity to the town centre, and its unsuitability for externality-generating uses, the former harness racing track should continue to be earmarked for an urban service-focused employment precinct. Council should consider the following:
 - a. Engage with the regional community and key stakeholders,
 - b. Identify pathways to developing the site, including providing minimum standard levels of infrastructure,
 - c. Produce a structure plan to inform future land use.
- 2. Investigate the viability/ feasibility of alternate road connections in and out of Strathalbyn's employment



lands and identify options.

- 3. Consider amendments to zoning in non-viable parts of the town's employment lands to support higher and better uses, taking pressure off areas better suited to employment uses.
- 4. Consider the use of employment land at Strathalbyn for a circular economy hub as functions and policies of the circular economy continue to evolve.

8.5.2 Town centre

Key issues related to Strathalbyn's town centre land are set out and described below.

Strong growth in demand for centre floor space in the context of supply constraints

The modelling indicates a gap in floor space of around 7,700 sqm emerging by 2041, with food and groceries and hospitality accounting for 29% and 25% of the total respectively. The centre is unusually configured, with the town centre split by the Angas River into two distinct sub-precincts. Partly as a result of this configuration, but also due to heritage constraints, there are challenges associated with delivering new floor space within existing zoned centre land.

Significant quantities of urban services in the town centre

There is an estimated 12,000 sqm of floor space within the town's TMSZ and TACZ lands, with a significant portion of that floor space linked to urban services. As discussed in section 8.5.1, urban services are activities for which high amenity centre environments are not critical for viability. Usually, these uses gravitate to employment lands, where they are able to capitalise on lower land values. The existence of urban services within town centres also adversely impacts on nearby centre retail and hospitality businesses by reducing visual amenity and mitigating against public space activation. Urban services are also relatively land intensive, so play a role in absorbing important centre land supplies. The impact of urban services is important in the case of Strathalbyn, especially given the shortage of land in the existing centre.

Figure 25. Urban services and other uses within TMSZ and TACZ land potentially better suited to high amenity employment precincts







One of the reasons a large quantity of urban services is found in the Strathalbyn centre (in contrast to Goolwa) is that there are no high-quality employment lands with good amenity in the region. As a result, these economically important businesses must locate on town centre land, where they are forced to compete for land with more productive centre users, undermining the productivity of local businesses and the broader regional economy.

Challenges to the existing centre structure

Some intensification of land use within the town centre is possible, but it is unrealistic to expect the new floor space totalling 7,700 sqm to be developed within the existing town footprint. This presents a dilemma for which there are (broadly speaking) two strategic approaches available to Council. These are identified and discussed below.

Option 1 – Pursuit of existing centre strategy

The existing strategy essentially seeks to harness market forces to address the challenges related to centre floor spaces. By constraining the supply of centre floor space, the underlying land value will rise to the point where the opportunity cost associated with existing urban services and manufacturing uses are too significant to ignore, and the



uses shift to less expensive land further south.

This strategy may result in the freeing up of land in the south of the town centre for expansion, or not, depending on a range of factors within and outside of Council's control. As a strategy, it can only be effective if the market has certainty that no alternate town centre land will be made available in other parts of Strathalbyn. At present, with significant pressure to establish a major retail centre in the northern part of Strathalbyn, the extended Town Centre has little value as town centre floor space.

Option 2 - Development of a secondary centre.

There is sufficient demand to accommodate the establishment of a second centre.

That said, there is a danger that – if large enough – a new centre would undermine or even subvert the centre hierarchy, undermining the economic and social role of the town centre. Two competing centres less than 1.5 kilometres apart is likely to lead to challenges with infrastructure provision and traffic congestion. In addition, by spreading the town's floor space across two centres, the critical mass necessary for the attraction of higher order retail, hospitality and services is less likely to be achieved, with a less appealing and diverse retail offer the result. With a newer centre likely to be of high quality and designed to meet the needs of modern consumers, it is likely to outcompete the town centre.

A second centre to the north of Strathalbyn would resolve floor space supply challenges, though at the cost of the historic existing town centre which is likely to be significantly impacted.

Option 3 - Development of a more attractive employment centre

It is possible that the land available between Hampden Way and Adelaide Road could also be used as an alternative employment zone, specifically to attract the urban services businesses currently in the town centre for which the current employment lands are too unappealing. This has the potential to release land in the town centre for conventional retail uses without creating a new competing centre.

Doing so would come at the cost of assigning part of the considerable available land between residential areas of Strathalbyn to relatively low-amenity uses. Its proximity to the town centre also runs the risk of creating a precinct similar to Hill Street in Port Elliot, where unintended users move into the precinct despite its zoning and organically create a competitor to the town centre despite the intentions behind the action.

Table 57. Strathalbyn town centre strategic options incl. advantages and disadvantages

Option	Advantages	Disadvantages
Option 1	 Maintenance of the primacy of the existing town centre and retain its heritage value as the social and economic focal point of the region. Would reduce the need for duplication of Council infrastructure servicing dual centres, and support investment in active and public transport networks. By leading to the consolidation of floor space, would support delivery of a large centre capable of appealing to higher order retailers and service providers. 	 Success ultimately to some extent outside of Council's hands. Failure to deliver on strategy would result in a growing undersupply of floor space at Strathalbyn, ultimately impacting liveability, and undermining economic growth.
	 By facilitating the relocation of urban services, would result in a high-quality town centre, and a more productive regional economy. 	
	 Complements strategic objectives regarding employment land in that it would be a critical element in supporting the establishment of a high- quality employment precinct at Strathalbyn. 	



- Would deliver high-quality, accessible floor space to regional residents.
- New floorspace in the north of Strathalbyn likely to support more rapid population growth and associated economic opportunities.
- Potential to severely undermine the role and function of the existing centre, with the new centre potentially becoming the de facto town centre.
- Would require duplication of infrastructure.
- Would complicate delivery of a new employment precinct to the south of Strathalbyn, potentially lowering land values in the existing centre and making it more attractive to these users.
- Would allow maintenance of the single town centre while releasing existing lots to meet projected demand.
- Would facilitate the relocation of conflicting urban services from the town centre, reducing their amenity impacts on neighbouring businesses.
- Available land may have higher value uses and creates potential for conflicts with neighbouring residential development.
- Relies on the attractiveness of a new employment centre to drive the relocation of urban services currently in town centre.
- Undermines the development of the existing employment land into a more attractive precinct that could attract urban services.
- Has the potential to attract some town centre retail tenants anyway, resulting in a conflict similar to that seen on Hill Street in Port Elliot.

Given the range of advantages associated with consolidated town centres, and the potential for it to support strategic outcomes in relation to Strathalbyn's employment lands, we believe that option 1 represents the best approach for Council. It is important to make clear that this option would need to be a part of an expansive strategic response that is inextricably associated with strategies relating to Strathalbyn's employment lands (see section 8.5.1).

Strategic responses

Option 2

Option 3

- 1. Reaffirm Council's opposition to the establishment of new floor space to the north of the existing centre.
- 2. Work to provide a high quality, serviced employment precinct to provide enticing alternate locations for urban service businesses presently occupying town centre land.
- **3.** Support targeted investment in amenity and town centre infrastructure to support increased visitation, land value uplift, and ultimately renewal opportunities.



Appendix

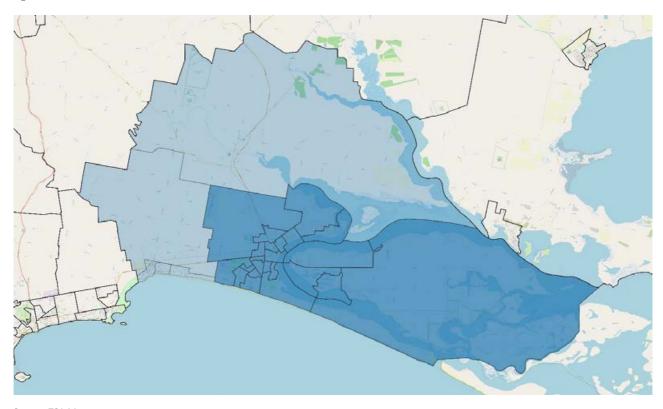
Township trade areas

To carry out the retail analysis, it is necessary to delineate township catchments. These catchments represent the places from which visits to the townships' retailers originate. To assist with setting in place these catchments, we have drawn on anonymised mobile phone data which tracks individuals' movements. Form this dataset, it is possible to develop an understanding of origin-destination patterns relating to visits to each of the towns.

Goolwa

Trade area catchment

Figure 26. Goolwa trade area catchment



Source: TSA Management

Goolwa is the largest township in the LGA, and, along with Strathalbyn, is the region's most important retail location. People movement data shows that the most significant sources of visitation are the township itself and Hindmarsh Island, while there is limited visitation to the town centre from the north. Nearby Middleton is also a relatively important source of expenditure, with only a limited retail offer in the township. Residents of Port Elliot further to the west are more closely linked to retail centres in Victor Harbor.

For this reason, to model demand for floor space in Goolwa, we adopt a primary catchment which includes Goolwa and Hindmarsh Island, while Middleton makes up a secondary catchment.



Middleton

Figure 27. Middleton trade area catchment



Source: TSA Management

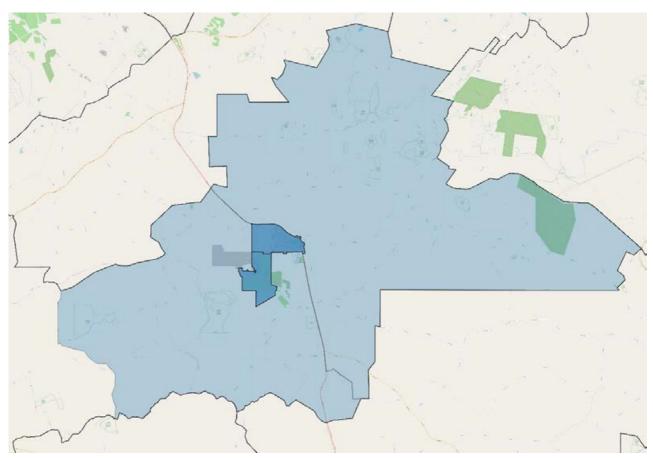
As per its workforce overview, Middleton appears to function largely as a part of the broader coastal economy from Goolwa to Victor Harbor than as its own independent centre. The very limited retail offering available means that some retail categories aren't even available in Middleton, let alone providing an offering that will draw shoppers from beyond the immediate proximity.

For this reason, we have adopted a primary catchment solely of Middleton and no secondary catchment to reflect the immediate proximity and greater breadth of offerings available in Goolwa, Port Elliot, and Victor Harbor.



Mount Compass

Figure 28. Mount Compass trade area catchment



Source: TSA Management

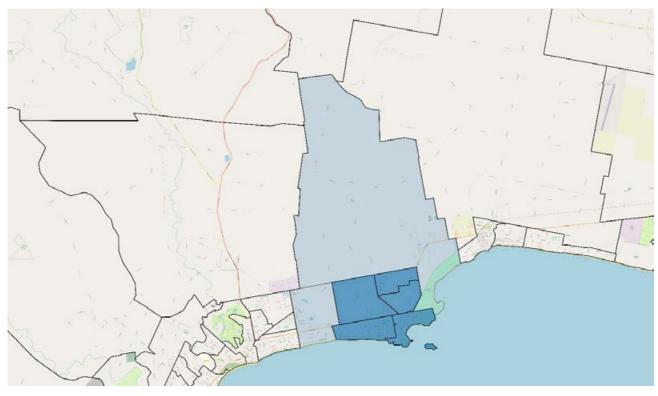
Because of Mount Compass' size, it has a limited retail offering to attract shoppers beyond the immediate township. Despite this, Mount Compass' relative remoteness allows it to draw in some shoppers from where it does not have competition from larger centres in the immediately adjacent rural areas.

Because of this, we have adopted a primary catchment of Mount Compass itself, and a secondary catchment covering the immediately surrounding countryside. Beyond this, competition with Willunga, Victor Harbor and Goolwa makes those services that Mount Compass provides less competitive against the more developed towns.



Port Elliot

Figure 29. Port Elliot trade area catchment



Source: TSA Management

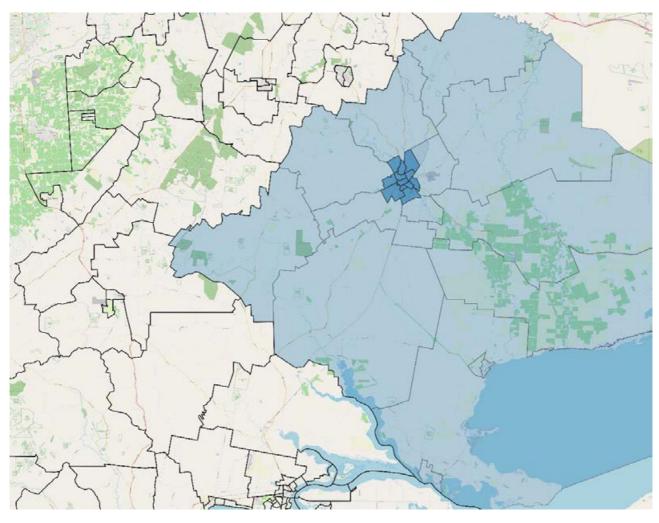
As a smaller settlement near larger centres, Port Elliot's catchment covers a smaller area than that of Goolwa or Strathalbyn. Trip data shows a close relationship between Port Elliot and the neighbouring suburbs both within Alexandrina and Victor Harbor. Because of the limited retail offering in Port Elliot and the ease of travelling to larger centres, there is a limited capacity for retail offerings in Port Elliot to compete to attract shoppers who live outside of the town boundaries.

Based on this, we have adopted a primary catchment for Port Elliot that is limited to the immediate township and a small secondary catchment that extends inland and into neighbouring Hayborough.



Strathalbyn

Figure 30. Strathalbyn trade area catchment



Source: TSA Management

Strathalbyn's central location and distance from other significant centres results in a catchment that extends over much of Alexandrina's south-eastern growing regions. People movement data indicates that Strathalbyn is an important centre for townships such as Willyaroo and Milang, with its central position in the road network making it the most accessible centre for a broad area before it begins to compete with Goolwa in the south. Competition from the significantly larger centre of Mount Barker makes Strathalbyn less attractive to regions to the north than those to the south.

For this reason, we have adopted a primary catchment for Strathalbyn to cover the township itself and a secondary catchment that covers the surrounding rural areas and extending to Lake Alexandrina in the southeast.

Best for Project

AUSTRALIA

SYDNEY | ADELAIDE | BRISBANE | CANBERRA | DARWIN MELBOURNE | NEWCASTLE | PERTH | PARRAMATTA

NEW ZEALAND

AUCKLAND | CHRISTCHURCH | TAURANGA WELLINGTON | QUEENSTOWN

MALAYSIA

KUALA LUMPUR

hello@tsamgt.com | tsamgt.com



DTI:PlanSA Submissions

From: Helen Bortoluzzi <

Sent: Wednesday, 15 November 2023 10:28 AM

To: DTI:PlanSA Submissions

Subject: City of Burnside Endorsed Submission - Greater Adelaide Regional Plan Discussion Paper 2023

Attachments: City of Burnside final endorsed Submission - Greater Adelaide Regional Plan Discussion

Paper.pdf

You don't often get email from

Learn why this is important

Good morning,

As agreed and further to the lodgement of an embargoed draft Submission, please find attached the City of Burnside's final, endorsed submission on the Greater Adelaide Reginal Plan Discussion Paper.

Regards





Office of the Mayor



14 November 2023

Growth Management Team Planning and Land Use Services GPO Box 1815 ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

Dear Sir/Madam

Submission - Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper.

For ease of reading, this submission has been prepared in alignment with the parts reflected in the Greater Adelaide Regional Plan Discussion Paper (the Discussion Paper) and refers to those matters most relevant to the City of Burnside.

Burnside City Master Plan - Connecting People to Places (Attachment A)

The City of Burnside endorsed the Burnside City Master Plan in August 2022, and this strategic planning document provides the foundation and guiding direction for Council's response to the current Discussion Paper.

The Burnside City Master Plan provided in Attachment A provides a strategic framework for developing city planning policy and managing population growth, urban form, development and transport within the City of Burnside over the next 10 to 20 years.

The City Master Plan was subject to extensive community consultation and identifies specific areas for greater housing diversity to accommodate the State Government's growth targets, balanced with protection of our city's cherished existing character, heritage and tree canopy. The City of Burnside proposes to work with the State Government to align the Greater Adelaide Regional Plan with the Burnside City Master Plan.

The City Master Plan is an exemplar approach to planning that will allow Council to partner with the State Government to achieve a holistic approach to managing growth and transport, balanced with protecting heritage, character, and tree canopy. We firmly believe the Greater

www.burnside.sa.gov.au ABN 66 452 640 504

Adelaide Regional Plan should aspire to the same philosophy and tackle city and transport planning from the same integrated perspective.

It is worth noting that a number of other councils in the Greater Adelaide Region are following the City of Burnside's lead and now developing their own city master plans. Indeed, the City of Adelaide has even adopted the Burnside City Master Plan's tagline, "Connecting People to Places" in promoting their community engagement forums for their new master plan.

The City of Burnside would embrace any opportunity to work closely with State Government to ensure alignment between the Burnside City Master Plan and the Greater Adelaide Regional Plan.

PART 1 - HOW SHOULD ADELAIDE GROW?

Based on the State Planning Policies and global trends, the Commission has put forth the following four outcomes to guide how Greater Adelaide should grow:

- 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; and
- 4. A greater choice of housing in the right places

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 guiding outcomes are a good starting point for discussion, but they must be underpinned by further investigation and analysis, sound planning and ongoing investment.

As shown by the Burnside City Master Plan, any vision for future growth must be underpinned by an integrated and sustainable transport system where traffic and transport are considered in conjunction with urban form as these elements are highly interdependent.

Further emphasis should be placed on the positive impacts that character and heritage can have on the creation of walkable neighbourhoods, place making and attractive destinations.

What other major trends and drivers might shape the future of Greater Adelaide?

There are countless trends and drivers which will shape the future of Greater Adelaide and many of these are already acknowledged by the Discussion Paper. The Burnside City

Master Plan highlights the following key trends that will affect connectivity in the transport system, urban form and function:

- Lasting impacts of the COVID-19 pandemic including an accelerated trend towards working from home which may impact how people use local facilities, traffic demand and commuter patterns and public transport patronage;
- 2. New technologies including video conferencing and high-speed internet connections for residential homes resulting in increased online shopping and delivery services. This in turn may affect the function of suburban centres with a higher demand for warehousing facilities. Transport is also undergoing many technological advancements, including autonomous vehicles; and
- 3. City planning policies must be structured to help communities adapt to the effects of climate change and an increasing emphasis on environmental sustainability. For example, the increasing use of electric and hybrid-powered private vehicles will require adequate charging infrastructure, and this will be challenging if planning policies do not mandate sufficient off-street private property car parking. How will residents charge their vehicles if they are forced to park on suburban streets?

Likewise, there will need to be innovative policies to ensure any facilitation of greater subdivision does not result in the wholesale removal of trees on private property or the removal of street trees to accommodate an increased number of driveways. Suburban trees are critical to cooling our neighbourhoods in the face of rising temperatures.

How should a land use plan address these trends and drivers?

A land use plan should consider the points outlined above, as well as the following themes:

- 1. Character, heritage and private and public tree canopy should be cherished and seen as an asset, rather than a deterrent to growth and prosperity;
- Financing and policy incentives are needed to encourage a greater diversity of housing;
- It is essential that the State Government support the development by councils of subregional plans such as the Burnside City Master Plan, along with any resultant required council-led Code Amendments.

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?

Greater emphasis is required on the following matters:

- Public and active transport, considering car-free or care-share developments where both public and active transport corridors exist;
- Separated cycleways (i.e., a network of paths for bicycles, including e-bicycles, separated from cars) to encourage and support active transport; and
- Creekline corridors, with daylighting of drains and the remaking and rewilding of natural creeklines, providing open space and active transport corridors.

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?

Through the implementation of the Burnside City Master Plan, the Council is committed to providing opportunities for the delivery of more diverse housing supply with a view to meeting the needs of all residents across a diversity of ages, cultures, genders and abilities.

Looking more broadly than the Burnside Master Plan and land use policy alone, locating a range of social agencies and infrastructure in a mixed-use precinct is usually a highly rewarding strategy. Precincts allow diverse public and private investments to be located together and are powerful opportunities to serve the community better. Cost-sharing opportunities can also be realised, supported by planning and governance arrangements. Due to these benefits, co-location is often preferable to developing new stand-alone or detached infrastructure. A stronger emphasis on this is required in the Regional Plan.

From a practical local government perspective, there could be future opportunities to incorporate our community activities and centres with businesses or other services to provide a 'hub' of services (or mixed use developments) for the community. This co-mingling mixed use approach also provides opportunities for social and affordable housing products. The opportunities to deliver better precincts needs to be identified in Regional Plan.

The way services are delivered and how, when and where they are accessed is changing. The type, location, fit-out and size of built infrastructure needed for service delivery is adapting to these changes. Despite digital systems opportunities, non-physical responses will never fully replace the need for physical service delivery. Personal and place-specific

social contact remains essential not only for practical service delivery but for the well-being of people and communities. Effective partnerships can provide more integrated, efficient and innovative outcomes to use infrastructure and deliver services. Governments have historically organised human services based on functions, such as education, health or housing. In both existing and emerging communities, agencies largely plan and deliver facilities independently, often collaborating only when obvious opportunities are identified, or partnerships already exist.

While it is not appropriate to co-locate all types of infrastructure, most social infrastructure has the potential to create positive partnerships that 'cross boundaries'. Sometimes unusual and less traditional partnering can provide unexpected outcomes. In established areas like the City of Burnside, significant benefits can be obtained by working across sectors, including identifying funding or appropriate sites for services. Where one agency alone may not be able to fully fund infrastructure or have a site available for expansion or redevelopment, partnerships between agencies can create mutually beneficial outcomes for developers, residents, and the community in general.

The inclusionary zoning scheme which is available in South Australia was seen to provide a fair and level playing field. There is an opportunity for mandatory inclusionary requirements for other social inclusionary requirements for example contributions to libraries, healthcare clinics, playgrounds, etc as part of new developments, particularly in high value markets. The impact of higher density and increases in population impacts social infrastructure. In most cases, these are services funded and provided by Council. There is an opportunity for developers or private investors to contribute to this for the community. This could be operationalised by 'staircasing' requirements when land is rezoned, commencing with a lower level which would be increased over a five-year period.

From a further practical perspective, coworking spaces could be looked at and an increase in neighbourhood programs could be investigated to ensure they are accessible to the broader community and ensure open space is utilised for multiple purposes (sport, recreation, social connection, community gardens etc).

Taking a long-term and future-focused approach to planning and considering every development and renewal as an opportunity for diversification, integration and partnership will help ensure that investments provide the best value and service for the community, now and in the future.

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?

The Greater Adelaide Regional Plan can contribute to a strong economy built on a smarter, cleaner, regenerative future by supporting the following:

- Planning for high-speed internet access to support working from home options to reduce commuter car travel and associated emissions; and
- A cleaner, cheaper, and more efficient, frequent, convenient and comfortable public transport system to encourage reduced car travel and associated emissions.

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?

The Greater Adelaide Regional Plan can encourage the delivery of greater choice across housing types and locations by facilitating the following:

- Greater investment in a range of public or public/private partnerships affordable housing in a variety of locations;
- Working with councils to identify appropriate opportunities for infill development in corridors, centres and precincts; and
- 3. Encouraging an innovative range of new housing options.

Living Locally

What neighbourhood features enhance living and working locally?

The Burnside City Master Plan makes many references to living and working locally. The following neighbourhood features are seen as important components of this concept:

- 1. Connection of people with place;
- Safe and attractive streets:
- Walking and cycling access for all ages and abilities to local shopping centres and precincts, parks and recreational spaces, schools, community centres, etc.;
- 4. Simpler, faster and connected bus networks;

- Safe and well-connected bicycle networks and the linking of destinations to these networks, including the provision of crossings on arterial roads and wayfinding signage;
- 6. Initiatives to manage traffic congestion on local and arterial roads; and
- 7. Traffic management in local streets such as lower speed limits and traffic calming.

PART 2 - WHERE SHOULD ADELAIDE GROW?

Urban Infill Growth

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

The concept of 'living locally' is generally supported and reflected in key components of the Burnside Master Plan and in particular through:

- Infill development which connects people with places and in localities which have access to amenities, services and transport.
- Locating more dwellings within the general vicinity of and on safe bicycle and pedestrian routes.
- Increasing density near shopping centres and work and opportunities within walking and cycling distance of housing.
- Making safe, accessible and attractive streets and spaces with plenty of casual surveillance and opportunities for people of all abilities to participate.
- Connecting people with places to provide more services and opportunities within walking and cycling distance of housing.

As proposed in the Burnside City Master Plan, infill development can achieve an urban form consistent with the principles of living locally by concentrating new development in corridors, centres and precincts with access to amenities, services and transport. There are four types of infill development supported in the City Master Plan:

- Corridor Developments where additional housing opportunities are identified in the City
 Master Plan along major road corridors. Residential development in these locations
 would mostly be in the form of apartments, with car parking on the ground floor and close
 to mix of commercial uses such shops, offices and retail;
- Centre-Based Development is intended to take advantage of the proximity to services
 offered in various existing retail and commercial centres Additional development capacity
 within the vicinity of centres is likely to include apartments with ground-floor retail and

commercial space, group dwellings and townhouses. Residential development will generally be setback from front boundaries and should seek to minimise driveway crossing points. Mixed-use development could include community accessible open space plazas and pedestrian spaces, emphasising canopy cover and plantings to street frontages;

- 3. Precinct-Based Development envisages increased development opportunities over a broad area that is delivered as part of a coordinated redevelopment. In these areas, increased density is encouraged, but would need to preserve the tree canopy, front landscaped setbacks and availability of on-street parking through minimising driveway crossovers. Apartment buildings and townhouses are the most likely built form outcome, with highly vegetated streetscapes and public parks. The consolidation of sites and the development of apartments should deliver increased setbacks to front and side boundaries, increased protection of existing vegetation and fewer driveway crossovers to protect the street trees and on-street parking.
- 4. Co-Housing in its original intent as explored in the 2020 'Cohousing for Ageing Well' research project envisages additional small dwellings within existing allotments with shared common areas, amenities and parking. The approach provides greater housing diversity to allow older people to down-size and "age in place", as well as providing more affordable housing options.

The shared use of communal areas, amenities and parking on a single property title can reduce the overall footprint of built structures and surfaces compared to two neighbouring properties on a subdivided title. It can also result in comparatively greater retention of trees and green spaces on private properties. The shared use of parking can reduce the number of footpath crossovers and associated impact on street trees, compared to separate properties with individual driveways. This approach also encourages the retention of existing houses and street-facing character, in place of demolition and subdivision.

The City Master Plan in Attachment A identifies specific areas of infill and growth, balanced with protection of existing character, heritage and tree canopy in other areas. The City of Burnside proposes to work with the State Government to align the Greater Adelaide Regional Plan with the Burnside City Master Plan.

In addition, the Regional Plan should also encourage an increase in safe bicycle and pedestrian routes throughout residential areas to connect people with places and provide more services and opportunities within walking and cycling distance of housing. There

should also be a focus of the creation of safe, accessible and attractive streets and spaces with opportunities for casual surveillance and opportunities for people of all abilities to participate;

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

Potential benefits of infill development include:

- Greater financial sustainability for all levels of government by containing sprawl which allows for economies of scale and the consolidation of infrastructure and public transport;
- Greater environmental sustainability by containing sprawl to protect areas of environmental significance and avoiding mass clearance of trees and wilderness, while also significantly reducing emissions from car travel;
- More equitable access to existing public and private services, facilities, and infrastructure;
- 4. The creation of walkable neighbourhoods and accessible destinations; and
- 5. Increases in total housing stock, affordability and diversity.

There are a number of potential drawbacks from infill development, and these can be exasperated by poor planning policies, design, materials and construction:

- Negative built form externalities including overlooking, overshadowing and privacy, increased site coverage, as well as amenity impacts on adjoining properties (e.g. line of sight);
- 2. Adverse impacts on and loss of existing established heritage and character:
- Loss of the existing, established private urban tree canopy, limitation of opportunities for the planting of new trees, and the impact of increased number of crossovers on street trees;
- Insufficient provision of on-site parking and a reduction in on-street car parking spaces due to an increases number of crossovers:
- 5. Lack of coordination of design outcomes without mandatory consolidation provisions;
- Garages which only just meet the Australian Standard for garage design (both depth and width);
- 7. Lack of on-site storage and garages;
- Lot size differentials;

- Impacts on existing infrastructure, particularly stormwater though increased site coverage and run-off; and
- 10. Inadequate waste management and collection in unit developments.

Strategic Infill growth

Where is the next generation of strategic infill sites?

Fragmentation of allotments sizes, ownership and the presence of heritage, character and environmental constraints make the large strategic infill opportunities like Bowden rare, particularly in the inner metropolitan council areas. There should be a focus towards smaller and more integrated strategic infill projects concentrated around bus stops and potentially in shopping centres. Traditionally, due to titling issues, housing delivered by the latter option tend to be build-to-rent only, but there are many centres and business areas that are underutilised and have capacity to accommodate mixed-use developments.

The Burnside City Master Plan in Attachment A identifies specific areas of infill and growth, balanced with protection of existing character, heritage and tree canopy in other areas.

Urban Corridor Growth

As described in the Burnside City Master Plan, there are many benefits to increasing growth along urban corridors. They offer opportunities for increased housing choice in established urban areas and located within close proximity to employment, services and public transport. Areas of distinctive urban character can be protected and traffic on established suburban streets can be diverted to the arterial road network, which can have a positive effect on residential amenity.

As illustrated through the City of Burnside Master Plan, urban corridor development will play an important role in the ongoing delivery of diverse housing supply in the inner metropolitan Council areas. This position is prefaced, however, with the point that corridor development needs to be in the right locations, away from areas with established heritage, character or natural constraints and where there is high frequency public transport.

Several of the proposed corridor investigation areas proposed in Figure 10 of the Discussion Paper are broadly supported by the City of Burnside (subject to further investigation and analysis) on the basis they align with the corridors outlined in the Burnside City Master Plan.

As shown in Attachment B, however, , the are several areas proposed for corridor investigation in the Discussion Paper that are inconsistent with the Burnside City Master Plan, particularly near areas of established heritage and character, and are therefore not

supported by the City of Burnside. Conversely, a number of other areas which have been identified for managed growth in the Burnside City Master Plan have not been identified in the Discussion Paper and these are also highlighted in Attachment B.

The City of Burnside proposes to work with the State Government to align the Greater Adelaide Regional Plan with the Burnside City Master Plan. Council also welcomes the Commission's understanding that Corridor development next to established residential land uses, particularly heritage and character areas, will be of a lower scale and intensity to manage the interface with adjoining neighbourhoods

Regenerated Neighbourhoods and Urban Activity Centres

The City of Burnside Master Plan at Attachment A seeks to connect people to places and identifies a number of existing centres where development growth may be considered in the right circumstances. Growth in and around centres should be of the right scale and the surrounding locality should be able to support such growth, particularly in relation to the local road network and infrastructure capacity.

Employment Lands

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

Factors for the Commission to consider in meeting future demand for employment land include:

- 1. Analysis of real time trends and data, particularly the supply and demand of employment lands:
- Ensuring that current and future rezoning proposals do not jeopardise the availability of employment lands; and
- Keeping abreast of emerging technological advancements.

Open space and Urban greening

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

State Government must work with councils in planning for and providing sufficient open space for growing populations, particularly in those areas targeted for higher density and reduced allotment sizes. This planning needs to consider the diverse range of sports, recreation and activities people enjoy in our open spaces, balanced with environmental

objectives, including biodiversity preservation and promotion of the cooling benefits associated with trees in our parks and reserves. Open spaces must also meet the needs of people of varying ages and abilities, and this will require careful planning around accessibility and connectivity.

The City of Burnside has commenced work on developing an 'Open Space Layer' for the Burnside City Master Plan, which will help prioritise the use of Council's open spaces, as well as identifying gaps and deficiencies. State Government support for developing and implementing City Master Plans and associated Open Space Layers, including any resulting Code Amendments will be crucial if councils are to meet the needs of their current and future communities.

Options for meeting the future open space needs of our growing population may include partnering with State Government to fund land acquisitions for conversion to open space, as well as working with public and private schools to enable greater community access to their sporting ovals and facilities.

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

The Planning, Development and Infrastructure Act 2016 (the Act) and the Planning and Design Code (the Code) does not present a balanced approach to protection of the urban forest. The Regional Plan should aim to rectify this and facilitate the fine tuning of supporting legislation and policy.

As a starting point, it should be recognised that there is far greater potential to increase canopy on private land, rather than public land. It is also important to acknowledge the role that increased site coverage and reduced front and rear setbacks are playing in canopy loss. Dwelling footprints are growing and are increasingly leaving less private open space available for entertaining, storage, landscaping and tree retention. Council is of the view that either front and rear setbacks in the Neighbourhood type Zones should be increased or the amount of deep planting area sought by the Planning and Design Code (the Code) should be increased substantially above their current standards. The Desired Outcomes for all zones, particularly the neighbourhood-type zones, also need to be revised to ensure that the urban forest in those areas is acknowledged, which should then filter down into more appropriate site-based policies (i.e. reduced site coverage, increased front and rear boundary setbacks).

The erosion of the urban forest is often attributed to a need to cut and fill land to achieve the required service falls or flood mitigation standards. Whilst we acknowledge that earthworks

cannot be avoided in all instances, the Planning and Design Code needs to provide more opportunity and guidance for the application of less invasive construction approaches with a view to retain more trees.

Consideration should also be given to the broader biodiversity and habitat value offered by the urban forest, which is a key feature of many other planning instruments interstate. Throughout the Code, there is an overall assumption that biodiversity only manifests in the urban environment through particular tree species, ignoring the larger habitat and ecological system that the forest supports. This paradigm needs to shift in the Regional Plan and ultimately the Code, with a greater recognition of the role that the urban forest plays in connecting local and regional wildlife networks.

Habitat mapping may have a role to play in informing development and conservation policy more broadly. The City of Burnside is currently constructing habitat models to inform decision making and we are of the view that this could prove very useful in the development assessment process. The habitat hotspot model assesses parcels of land to determine its potential as habitat, considering factors such as the quality of existing habitat, parcel size and proximity to other habitat. If there was an appetite to strengthen Code policy (Urban Tree Canopy Overlay) to increase recognition of habitat value, such an innovative tool could prove valuable.

If one of the key aims of the Regional Plans is to create living locally and increase the take up of walking and cycling as an alternative mode of transport, then there needs to be a greater provision of shade, not just in a residential setting, but more broadly. Cumulatively, most non-residential zones incorporate the greatest proportion of hardstand areas and, when reviewing the LiDAR mapping, they are generally in the greatest need of canopy cover. They also represent a significant extent of inner metropolitan Adelaide where there is an increased focus on walking. Council believes there is scope to broaden the application of the Urban Tree Canopy Overlay across a wider selection of Zones or consider a new overlay that seeks to link increased canopy cover with high heat areas identified by the LiDAR mapping more broadly.

Quality of tree canopy is as important as quantity and metrics exist that measure diversity of species. Targets need to be nuanced and consider local conditions, including natural vegetation assemblages, rainfall, and the availability of supplementary water (with a lens for future climate change).

Finally, the Regional Plan should acknowledge that more research is required to ensure the trees we are all planting are climate resilient and will survive projected changes in our climate.

PART 3 - IMPLEMENTING THE GREATER ADELAIDE REGIONAL PLAN

The Burnside City Master Plan was developed with extensive community engagement and provides a clear direction for Council's vision for sustainable growth and development within the City of Burnside, consistent with the objectives of the Greater Adelaide Regional Plan.

The City Master Plan identifies specific areas of infill and growth, balanced with protection of existing character, heritage and tree canopy in other areas.

Attachment B provides a summary of inconsistencies between the Discussion Paper and the Burnside City Master Plan that need to be resolved in collaboration with the City of Burnside in implementing the Greater Adelaide Regional Plan.

If you wish to discuss anything in this letter, please contact Aaron Schroeder, Strategic Projects and Planning Manager on or via e-mail on

Yours sincerely

Anne Monceaux

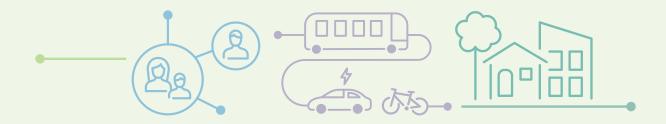
Mayor of City of Burnside





Contents

Strategic Context	4
Guiding Principles	6
Burnside Strengths and Challenges	8
City Master Plan	10
Future Urban Form	12
Future Mobility	16
Planning for an Integrated Transport System	17
Traffic and Transport Initiatives	18
Master Plan Process	20







Across 2021 and 2022, Council sought feedback from the residential and business community to inform the Burnside City Master Plan.

The City of Burnside is a much-loved place for residents and visitors with a long history and an important future. Burnside is an aspirational address, and as Burnside's population continues to grow, we need to plan for the provision of housing that suits the needs of our diverse community. The Burnside community also require open space, a range of convenient mobility options and good access to services.

In mid-2021 Council engaged with residents and businesses in Burnside to capture ideas to inform the drafting of the Burnside City Master Plan. We received a wide range of feedback, which has been summarised into the following key themes:

- Improve the convenience, safety and comfort of pedestrian and cycling routes through the City
- Burnside requires more convenient and direct public transport routes
- Traffic calming measures should be implemented in some local streets
- Increased housing is resulting in the removal of street trees and existing gardens, reducing availability of on-street parking and changing the character of Burnside.

A second round of community consultation was held in May 2022 to seek feedback on the draft City Master Plan. It was positively received and provided many ideas for the development of a separate Action Plan to support the implementation of the City Master Plan. The Action Plan will be refreshed yearly to ensure it reflects changes in prioritisation and funding and changing community needs or new opportunities.

This feedback from both rounds of consultation directly informed the Burnside City Master Plan which provides a strategic framework for the proactive management of future population growth, housing and transport over the next 10 to 20 years. The Master Plan needs to balance the increasing demand for new housing with the protection of the character, heritage and natural environment that our residents most value, linking urban form with transport improvements to deliver a prosperous city with a healthy, safe, connected and active community.

In 2021, the State Government introduced a new Planning and Design Code that altered the type and extent of development that could be undertaken across our suburbs. The City Master Plan will help Council to strategically manage these changes as well as impending future growth, presenting a recommended direction for land use, urban form and the supporting transport system within the City of Burnside.

The new State planning system allows for greater development potential for new housing across the City of Burnside. The City Master Plan proposes to direct this into areas which can support a more diverse form of development, particularly along major road corridors, and in centres and redevelopment precincts. Importantly, this would be balanced with additional protection for those existing residential areas that are highly valued for their character and amenity.

It is important that traffic and transport be considered in conjunction with urban form in the City Master Plan as these elements are highly interdependent. This document is the first iteration of the City Master Plan. Subsequent iterations of the City Master Plan, introduced over a number of years, may include additional elements such as:

- · Environmental value
- · Open space
- · Economic development
- · Social, community and cultural planning and
- · Community hubs and recreational activities.

Guiding Principles

Several important factors will affect the future growth of the City of Burnside and they have influenced the development of the City Master Plan.

Burnside 2030 Strategic Community Plan

A set of Guiding Principles were established to guide the development of the City Master Plan. The Guiding Principles seek to align the Plan with the Burnside 2030 Strategic Community Plan and ensure a consistent approach is applied across Council's strategic documents, with each proposed intervention contributing to the broader outcome.

Goal 1

A resilient, healthy and connected community

The Master Plan will:

- Promote community interaction
- Identify areas for new retail and commercial floor space in mixed-use buildings within corridors, centres and precincts.

Goal 2

Our City will be a leading environmental custodian

The Master Plan will:

- Promote environmental sustainability, including retention of the existing tree canopy
- Encourage new housing in locations with existing services and infrastructure.

Goal 3

A City of accessible and liveable precincts, open spaces and treasured heritage

The Master Plan will:

- Provide for land uses and development that adds value to precincts
- Align with previous Council plans and feedback from community engagement
- Identify areas for improved housing diversity to cater for the needs of the entire Burnside community
- Promote economic sustainability of business
- Improve the safety and convenience of pedestrian and cycle connectivity
- Promote walkable neighbourhoods
- Support the retention of valued residential character areas
- Facilitate increased housing in corridors, centres and precincts bringing vibrancy and activation to these areas
- Support increased opportunities for employment within accessible locations.



Changes to the Planning System

A key direction of the State Planning Strategy is the encouragement of urban infill and higher densities in inner suburban areas. This aims to curb urban sprawl and encourages new housing into locations with good access to existing schools, services and transport.

For Burnside, this means that a portion of South Australia's new population and dwelling growth must be housed within existing suburbs.

In March 2021, the State
Government introduced the
Planning and Design Code (Code)
across South Australia. The Code
was one of the most significant
changes ever made to the Planning
System. It replaced individual
Council Development Plans with
a single planning "rule book" for
the State, providing a standardised
approach and reducing the
number of planning zones.

The new planning system has increased the potential for the following implications within the City of Burnside:

- Loss of existing established buildings through increased support for demolition and new builds
- Loss of mature vegetation and threat to existing street trees
- Replacement of single dwellings with a denser built form leading to increased driveway crossovers and the loss of on-street parking and street trees
- Introduction of new contemporary housing designs into traditional streetscapes
- Ability for new buildings to be set closer to street frontages and side boundaries than the setbacks of existing homes
- Large two-storey homes with smaller gardens
- Increased potential for overlooking and overshadowing from new housing.

Under the new Planning System, Council can apply to the State Government to make amendments to the zoning applied to an area or apply for variations to the minimum lot size and building height. The Burnside City Master Plan recommends changes to zoning across parts of Burnside to balance the protection of character suburbs with the increased potential for new housing along road corridors, within centres and development precincts. This will help Council address the new housing targets set out in the State Planning Strategy.





Burnside Strengths and Challenges

A crucial part of drafting the City Master Plan involved identifying the strengths of Burnside's urban form and transport system that should be protected, and any challenges that should be addressed in light of future trends.



- Burnside has excellent access to services, community facilities, transport, and open space.
- Quality public open space exists across the City, including Hazelwood Park, Kensington Wama / Kensington Gardens Reserve and Tusmore Park, and many more.
- Many areas have notable historic homes, including Toorak Gardens, Rose Park, Beulah Park, Eastwood and Tusmore.
- The City of Burnside is one of Adelaide's most desirable places to live, with large, detached character homes and tree-lined streets. As a result, the local median house price in June 2021 was \$1.1M, up 16.4% from 12 months prior.
- Much of Burnside is situated close to the City, making it an attractive proposition for people commuting to work in the Adelaide CBD or other inner suburban locations.
- Key centres, precincts and arterial road corridors provide opportunities to deliver housing diversity.
- Some areas have a high level of protection through existing Heritage Overlays (including Rose Park, Tusmore and parts of Beulah Park, Eastwood, Glenunga, Kensington Gardens, St Georges and Toorak Gardens).
- The Hills Face Zone is well protected with strong planning policy protections.
- Vehicle movement is well catered for on roads that provide convenient car access to and from and within Burnside.
- Many suburbs along main road corridors have regular bus services to the Adelaide CBD.
- Local shops, parks and schools are generally accessible along good footpaths and tree-lined streets.



An example of Burnside's cherished street tree canopy that this City Master Plan is seeking to protect.

Challenges

- The Burnside community is expected to diversify and grow modestly over time. Population projections forecast that an additional 2,147 dwellings will be required across the City of Burnside by 2041, an increase of 10.7%.
- Without intervention, existing building stock and local character will continue to be eroded across parts of Burnside due to changes introduced by the new State planning system.
- High property values combined with relatively large minimum lot sizes encourages the market to deliver large and expensive dwellings to maximise the return on the high cost of land.
- Without intervention, a lack of housing variety will continue, with new dwellings likely to be large 4+ bedroom houses.
- The COVID-19 pandemic has resulted in more people working permanently or semi-permanently from home, resulting in demand for separate home offices.
- Without intervention, it will be increasingly more difficult to find smaller, single-storey homes appropriate for Burnside's ageing population and those wishing to downsize.
- The median house price in Burnside has risen from \$695,000 in 2013 to \$1.1 million in 2021. People looking to enter the Burnside property market for the first time (such as adult children of local families) are finding it more difficult due to large dwellings and resulting high prices.
- Greater urban development in existing residential areas may result in the removal of private and street trees to make way for new buildings and driveways, impacting amenity and the cooling effect provided by the street tree canopy.
- Parking, vehicle movement and access can be problematic on narrow residential streets, affecting the amenity for local residents.



- Some residential streets experience non-local through traffic passing between busy arterial roads.
 This requires local traffic management measures to discourage the "cut through" traffic.
- Generally, Burnside has lower patronage on bus services compared with other Councils in Adelaide. Burnside has only four "Go Zone" corridors into Adelaide CBD, and poor service coverage in the Hills areas and for north-south trips across the City of Burnside.
- Bicycle route connections are incomplete and cyclists must contend with busy arterial roads and unsafe crossings.



City Master Plan

The City of Burnside Master Plan was developed using existing research, the knowledge and experience of planning and transport consultants, and feedback received from the community, Council staff and Council Members.

> The City Master Plan seeks to connect people to places and provides a high-level view of the following features:

- · Existing centres, commercial corridors and development precincts
- · Future urban uplift growth opportunities
- · Existing historic overlay areas
- Areas for investigation to introduce planning policy to increase protection of Burnside's character suburbs
- Existing and proposed enhanced bus services
- · Essential walk and cycle routes and crossings
- · Suburbs for potential 40 km/h speed limit areas.

The City Master Plan forms the basis of future detailed investigations into changes to development zones, land use, urban form and the transport system.

This will involve future community consultation and engagement and advocacy with the State Government on future Code Amendments, improved and new bus routes and the implementation of 40 km/h speed limits for selected suburbs or special precinct areas.

The precise boundary of the protection and uplift opportunities would be investigated and confirmed via a future Code Amendment involving community engagement prior to adoption.

with the map on page 11, comprises both Urban Form and Transport initiatives that you can explore in further detail on the following pages.







Future Urban Form

Two joint approaches to managing the urban form and development into the future are in the Burnside City Master Plan. They are:

- Increased protection areas, and
- · Increased growth areas.

The City Master Plan envisages an alternate urban form where our highly valued character properties in the City of Burnside's neighbourhoods are preserved (Protection Areas) and balanced with areas that can house Burnside's growing population and future housing (Growth Areas).

The goal of the City Master Plan is to seek a net zero change in the development capacity envisaged for Burnside in the new State Planning and Design Code. This would result in reduced development capacity in the established suburbs, offset by increased capacity in selected locations. This approach still requires State Government support and would be subject to detailed investigations and community consultation as part of a future rezoning (Code Amendment) process.

Protection Areas

One of the critical issues for Burnside arising from the recent planning changes, is the subdivision of lots with new development and its subsequent impact on the character of a neighbourhood. For example, the potential for an increasing number and form of dwellings may result in more driveway crossovers, leaving less room for Burnside's characteristic street trees.

Identifying an alternative approach to managing growth in a way that provides measures to maintain Burnside's highly desirable character is a key priority of the City Master Plan. This increased protection is to be achieved through two key planning mechanisms.

Reduced Subdivision Potential in some areas

The subdivision of land results in additional allotments, typically seeing additional driveway crossovers being cut into existing streets which reduces the space available for street trees and on-street parking. In addition, subdivision usually results in the demolition of the existing home, which may alter the area's character.

The City Master Plan provides strategic policy to increase the areas of Burnside where subdivision is discouraged, while adding planning protections to the architectural style of both the existing and new development in some areas with a more clearly defined character. This would require a change in planning policy to increase the minimum site area for some types of development. This means that fewer allotments would meet the criteria for land division and existing dwellings and character streetscapes are more likely to be retained.

An example of a Burnside home that would be protected from demolition through the introduction of this policy.



Increased Design Controls and Minimum Lot Site

Some parts of Burnside are already relatively well protected. The highest level of neighbourhood-scale protection available in the Planning and Design Code is the Historic Area Overlay. Where this overlay is applied, planning permission is required for demolition, even where a dwelling is not heritage listed. The Historic Area Overlay also provides principles to guide the architectural design of any new development. Council is proposing to expand this Historic Area Overlay to additional areas.

The next level of character protection for those areas that cannot meet the strict Historic Area criteria is the Character Area Overlay. A Character Area Overlay provides a greater level of guidance regarding the architectural design and form of new development. No demolition controls exist within a Character Area Overlay, but the minimum lot size can be increased to reduce the potential for demolition of housing. Furthermore, the minimum lot size is proposed to be increased in selected suburbs of Burnside to reduce the number of homes to be demolished for development and to minimise the loss of tree coverage.



Various protection measures are proposed to be investigated for application in the locations identified in this table. The final scope and areas would be subject to further technical investigations, community consultation and the Code Amendment process in negotiation with the State Government.

Historic Area Overlay	Character Area Overlay and Increased Minimum Lot Size	Increased Minimum Lot Size	Hills Neighbourhood and Hills Face Zone (no change)
 Beulah Park (part) Eastwood (part) Glenunga (part) Kensington Gardens (part) Rose Park St Georges (part) Toorak Gardens (part) Tusmore Dulwich Kensington Park (part) Leabrook (part) 	 Beulah Park (part) Eastwood (part) Erindale Frewville Glenunga (part) Hazelwood Park (part) Kensington Park (part) Kensington Gardens (part) Leabrook (part) Toorak Gardens (part) 	 Beaumont (part) Burnside (part) Glen Osmond (part) Hazelwood Park (part) Linden Park Magill (part) Rosslyn Park (part) St Georges (part) 	 Auldana Beaumont (part) Burnside (part) Glen Osmond (part) Mount Osmond Rosslyn Park (part) Skye Stonyfell Waterfall Gully Wattle Park

Environmental Protection

Council's commitment to protecting our city's natural environment and tree canopy is set out in our suite of environmental plans including our Environmental Sustainability Strategy, Canopy Action Plan, and Environmental Sustainability Roadmap. This all-encompassing approach to environmental sustainability is front and centre in the urban and transport planning mechanisms proposed by the City Master Plan.

The City Master Plan advocates an increase in minimum lot sizes in a large proportion of our city to help reduce the number of housing demolitions, subdivisions, and new crossovers, thereby reducing the loss of tree coverage. The City Master Plan's approach to "growth areas" sets out the need for planning policy that minimises crossing points while emphasising canopy cover and more street trees. The proposed "growth precincts" will also encourage density in areas nearer to transport services, shopping and other facilities to help residents reduce their own environmental footprint.

This first iteration of the City Master Plan is focussed on urban form and transport management. Future iterations will introduce additional layers such as environmental value and open space.

Shows the changes from current Code policy



Growth Areas

With the City of Burnside expected to accommodate an additional 2,150 dwellings by 2041, new housing needs to be accommodated through different development opportunities. Much of this housing growth will cater for older age groups looking to downsize into smaller, more manageable dwellings and first home buyers looking to enter the City of Burnside property market. Both buyer groups are looking for housing with easy access transport options and within walking distance to services and facilities.

The State Government's 30 Year Plan for Greater Adelaide envisages much of the City's infill growth occurring along key growth corridors, in centres, and development precincts that are well serviced by public transport. These objectives are proposed to be strengthened and supported in the Burnside City Master Plan.

New development is proposed to be concentrated in urban form diversity areas, providing a greater variety of housing options in corridors, centres and precincts, which have access to amenities, services and transport.

Four types of development growth are in the City Master Plan:

- Corridor Development
- Centre-Based Development
- Precinct-Based Development
- Future Living (Co-Housing)

Actions will be undertaken to address impacts on liveability, wellbeing and open space through development of precinct master plans to manage density in a sensitive manner.



Corridor Developments

While the increased density of housing is already encouraged along major road corridors, additional housing opportunities are identified in the City Master Plan along major roads, such as Glen Osmond Road, Magill Road, The Parade and to a lesser extent, Fullarton Road, Greenhill Road and Kensington Road. This potential development would be encouraged between two and four-storeys, with the final height determined by planning policy that manages potential impacts, such as the overshadowing of adjacent residential areas. For example, four-storeys on the north side of arterial roads and threestoreys on the south side would address overshadowing concerns.

Residential development in these locations would mostly be in the form of:

- Residential flat buildings (apartments), with car parking on the ground floor
- New buildings that contain shops or other commercial uses fronting a major road
- Buildings at ground level fronting the street with upper levels and balconies setback
- A mix of uses, with offices, retail and new dwellings along new corridor areas
- New residences, close to existing services, would provide an attractive, low maintenance and more affordable option for couples, people living alone and first home buyers than typical detached homes.

Centre-Based Development

Centre-Based Development is intended to take advantage of the proximity to services offered in the various retail and commercial centres across the City of Burnside, including:

- · Glen Osmond
- · Devereux Road
- Erindale
- · The Parade, Magill
- · Kensington Road, Leabrook
- · Greenhill Road, Burnside
- Magill Road, Kensington Park
- · Burnside Village.

While this is not a complete list of local centres in the City of Burnside, these centres have a scale and are in a locality where some development surrounding these centres may be feasible.

Additional development capacity within the vicinity of centres is likely to include:

- Apartments with ground-floor retail and commercial space
- Group dwellings and townhouses
- Residential development will generally be setback from front boundaries and should seek to minimise driveway crossing points
- Mixed-use development could include community accessible open space plazas and pedestrian spaces, emphasising canopy cover and plantings to street frontages.

Precinct-Based Development

Precinct-Based Development envisages increased development opportunities over a broad area that is delivered as part of a coordinated redevelopment. Growth would be expected to continue across Glenside, building on the existing new land and built form development and within sections of Magill and Kensington Gardens.

In these areas, increased density is encouraged, but would need to preserve the tree canopy, front landscaped setbacks and availability of on-street parking through minimising driveway crossovers.

Apartment buildings and townhouses are the most likely built form outcome, with highly vegetated streetscapes and public parks. The consolidation of sites and the development of apartments should deliver increased setbacks to front and side boundaries, increased protection of existing vegetation and fewer driveway crossovers to protect the street trees and on-street parking.

Most development will likely involve:

- Two or three-storeys (such as in Magill / Kensington Gardens and suburban Glenside)
- In larger development precincts, taller buildings setback from existing residential interfaces may be appropriate (for example, on the expanded Glenside site, where 4 to 6 storeys is possible in the centre of the site and lower scaled development at the interface with surrounding development).



Future Living Co-Housing – State Government led Code Amendment

The Future Living Code Amendment is in the early phase of drafting and is being driven by the State Government. This Code Amendment seeks to guide how existing houses in traditional suburbs might be altered and extended, or detached buildings incorporated into rear yards, to create one or more additional dwellings on a site. This co-housing arrangement would suit older residents wishing to age in place or young people looking for independent living. The focus of this Amendment is to maintain the character of the existing suburbs through the retention of the original dwelling while providing an alternative housing option to the rear.



Future Mobility

Three key trends affecting connectivity in the transport system, urban form and function are:

- The lasting impacts of the COVID-19 pandemic
- New technologies
- Environmental policies

Post COVID-19

The COVID-19 pandemic has resulted in an accelerated trend towards working from home. This change of work behaviour has substantial impacts on residential areas, with more people using nearby cafes and shops, rather than commuting elsewhere. This provides a higher demand for commercial development at a neighbourhood level closer to housing. This is also affecting peak hour traffic demand and commuter patterns.

Public transport patronage has been significantly affected by the pandemic. Usage has only recovered to about 65% of the pre-pandemic patronage.

Encouraging people back on to the buses is a challenge with many preferring the private car for both safety and convenience reasons. Others have adapted their travel behaviour with more walking or cycling for shorter trips. This lower patronage and attractiveness of travel by bus may limit the demand for improved services. COVID-19 has also resulted in people placing an increased value on walkable neighbourhoods.

New technologies

The increased usage of the Internet with video conferencing and calls for both work and social interactions has given a much larger proportion of the community an alternative way to communicate with others rather than meeting face to face. It has also allowed the flexibility for many others to work from home and has reduced the commuter travel demand.

High speed home internet connections have also provided wider acceptance of online shopping, food delivery services and the streaming of entertainment. This has affected the demand for in-person shopping and other social and recreational experiences that were traditionally provided in shopping centres or by businesses in main streets. This could result in changes to the function of suburban centres with a higher demand for warehousing facilities in proximity to residential areas.

Transport is also undergoing many technological advancements in the form of autonomous vehicles, with many new cars capable of self-driving to varying degrees. In the long term, widespread use of these vehicles could become a game changer as vehicle sharing is more likely when people only access a vehicle when it is required. This could lead to lower levels of private car ownership. For convenience and amenity, these vehicles would need to be dispersed throughout areas, similar to the emerging arrangements with shared scooters and bicycles.

Environmental policies

Protecting the local environment in the well-treed suburbs of Burnside and adapting to the effects of climate change requires a balanced approach in urban areas with environmental stewardship. The impacts of carbon emissions from transport can be mitigated with a greater adoption of electric and hybrid-powered private vehicles and the State Government having a policy for a zero-emissions bus fleet.

Local streets that are managed by the Council need continued maintenance and appropriate tree cover which supports cooler streets and encourages more walking and cycling.



Planning for an Integrated Transport System

Council has a vision for increased use of sustainable transport with safer streets to encourage more walking, cycling and public transport.

Living local

Supporting more local trips to schools, shopping centres, parks and reserves by walking and cycling.

Commuting smarter

Encouraging greater use of non-private vehicles and where practicable, support commuters to travel by bus, walking and cycling.

Managing heavy traffic impacts

Working with the State Government in the planning and design of future infrastructure.

The following transport themes were developed:

- Living local with safer, attractive streets to implement policies for improved walking and cycling access to local shopping centres, parks, schools, community centres and precincts within and accessible for City of Burnside residents. This includes 40km/h speed limits in a selection of suburbs, traffic calming devices on local streets, connected cycle networks, improved footpath network connections, management of on-street parking and traffic on local streets and near and at retail precincts.
- Commuting smarter for Burnside residents to provide better commuter cycling routes and a simpler, faster, connected bus network and other initiatives to manage the traffic congestion on arterial roads, without the need for major road widening projects.
- Managing through traffic movements with an advocacy role for the Council to collaborate with the Department for Infrastructure and Transport (DIT) on the management of the heavy freight trucks and external commuter traffic (non-Burnside resident traffic) on arterial roads, such as Portrush Road, Magill Road, Greenhill Road, Kensington Road, Fullarton Road and Glen Osmond Road.
- As part of the transport system, emerging trends in transport technologies were considered for the City Master Plan to support the proposed changes to the urban form and planning policies.

Emerging trends in technical and policy directions to be considered in planning for an integrated and inclusive transport system and aligned with urban form in the City of Burnside include:

- · Ride share (taxi, Uber)
- · Shared use (flexicar)
- On-demand transport services
- Electric vehicles and charging stations
- Electric fleet
- · Zero emissions buses
- Electric bicycles
- · Micromobility (electric scooters)
- · Mobility as a Service
- · Autonomous vehicles
- Smart car intelligent information systems



Traffic and Transport Initiatives

The relationship between urban form, land use, activation and the transport system in the City of Burnside is critical to the development of a City Master Plan.

A balanced transport system needs to consider the following key transport objectives:

- Management of local traffic on residential streets
- Encouragement of higher use of walking and cycling for local trips
- Promotion of greater use of the public transport bus network as an alternative to private vehicle usage
- Support for efficient and safe movement of all traffic including freight on the arterial road network.

Traffic Management in Local Streets

Measures proposed for Council consideration include:

- · Lower speed limits for local streets in selected suburbs
- Traffic calming to slow down traffic and assist other users in local streets
- Streetscaping and planting in verges and wider footpaths to provide a safer and improved amenity for walking and local residents
- Traffic management plans for selected suburbs
- · Slow down day events for selected locations
- Devices to notify motorists of speed
- Review of the existing road network hierarchy and road classifications.

State roads are mostly 60 km/h and most local streets are 50 km/h. The local streets in the Glenside urban development area already have a 40 km/h speed limit. A 40 km/h speed limit may be introduced to an area to help create a speed environment appropriate to local streets. The speed limit of 40 km/h is generally appropriate in precincts where existing speeds are not overly high. These may be areas where higher speed streets have been treated with local area traffic management devices, or where speeds are naturally low because of existing road and traffic characteristics. Local community support for speed-limited areas is important for the successful implementation of this type of speed limit. It is proposed that Council consider a 40 km/h speed limit in the following suburbs initially to be progressively implemented through consultation with residents and businesses:

- · Eastwood, Glenside, Frewville and Glenunga
- Beulah Park and Kensington Park
- Dulwich, Toorak Gardens and Rose Park.

Council may also consider different street designs and types of traffic calming measures to discourage unwanted through traffic and slow down traffic speeds, resulting in a lower risk of vehicle, bicycle and pedestrian crashes. These measures include:

- · Different pavement treatments
- · Raised intersections
- · Wombat crossings
- · Angled slow points (chicanes)
- · Single lane slow points
- Flat top road humps at mid-blocks
- Driveway links
- · Pedestrian refuges in medians.





Improvements to Promote Cycling

In order to make cycling for commuting, recreational and local trips more attractive to a greater number of residents and visitors to Burnside, more detailed planning and consultation is needed. Options for improving bicycle routes through the City of Burnside and with adjoining Councils and new connections and safe crossings of busy roads to complete the bicycle network should be considered.

Ways to achieve a safer and more connected bicycle network include the following potential projects:

- Improving connections in the north-south and east-west cycling network
- Extending existing routes to connect to those in adjoining Councils
- Link destinations to attract more cycling for local trips to:
 - Schools
 - · Shopping centres
 - · Parks and reserves
 - · Sports facilities
 - · Library and civic centre
- Enhance existing commuter routes to Adelaide city centre
- Provide crossings of arterial roads
- Install and maintain sharrows and wayfinding signage.

Better Bus Services

While the State Government is responsible for bus services in the City of Burnside, Council can play a strong leadership role by advocating for the following improvements:

- Extension to Route 861 to Beaumont via Glen Osmond and St Georges
- Extension to Route 820 along Greenhill Road to Beaumont and upgrade to Go Zone services
- · Provide ideas to the State Government for:
 - other local bus routes to be redesigned to improve the accessibility to bus stops
 - provision of more direct services to key destinations, such as Adelaide CBD and Burnside Village
- Introduce on-demand transport services to the Hills Face suburbs, including Wattle Park, Stonyfell, Burnside, Beaumont and Glen Osmond
- Advocate for a zero emissions bus fleet to be progressively implemented by the State Government
- Bus stop and shelter audits and upgrades to consider local placemaking opportunities.



What have we done

- Community Consultation with Burnside residential and business community.
- Consultation with key stakeholders including the adjacent Councils, aged care facilities, bicycle user groups, schools, health facilities, major landowners and retail centre managers.
- Consultation with State Government departments and transport organisations.
- Consultation with the Royal Society for the Blind.

Current state

Planning and Design Code implemented by State Government 2021

Burnside City Master Plan

- Initial Burnside City Master Plan adopted by Council and accompanying Action Plan developed to support implementation.
- Commencement of key Action Plan initiatives.
- Consider implications of new Planning and Design Code implemented by the State Government in 2021 on the future growth and character of Burnside.
- Allow for future iterations including other master plan elements, such as open space and environmental value.

Future consultation opportunities

Integrated Local Area Transport Plans

- Local Area Transport Management Plans, including 40 km/h speed limit areas, traffic calming measures on local streets, and footpath and bicycle network improvements.
- Lobby the State Government for improved bus services (such as more Go Zones, on-demand transport services and electric buses).

Code Amendments (Rezoning)

- · Time minimum 12 months.
- Advocate for the State Government to make Code Amendments that support the intent of the Burnside City Master Plan.
- Code Amendment Technical Investigations (such as Heritage Assessments).
- Drafting Code Amendment including all supporting technical reports.
- Community Engagement on proposed zoning changes aligned with Community Engagement Charter and State Government requirements.

Future consultation opportunities

Concept Planning for Transport Projects

 Consultation on individually designed and costed treatments for traffic calming and footpath and bicycle network improvements with the local community, stakeholders and State Government for speed limit and road hierarchy changes.

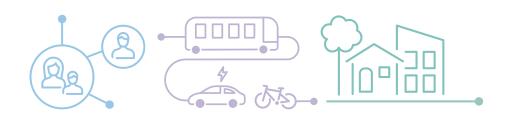
Individual Site Development Applications

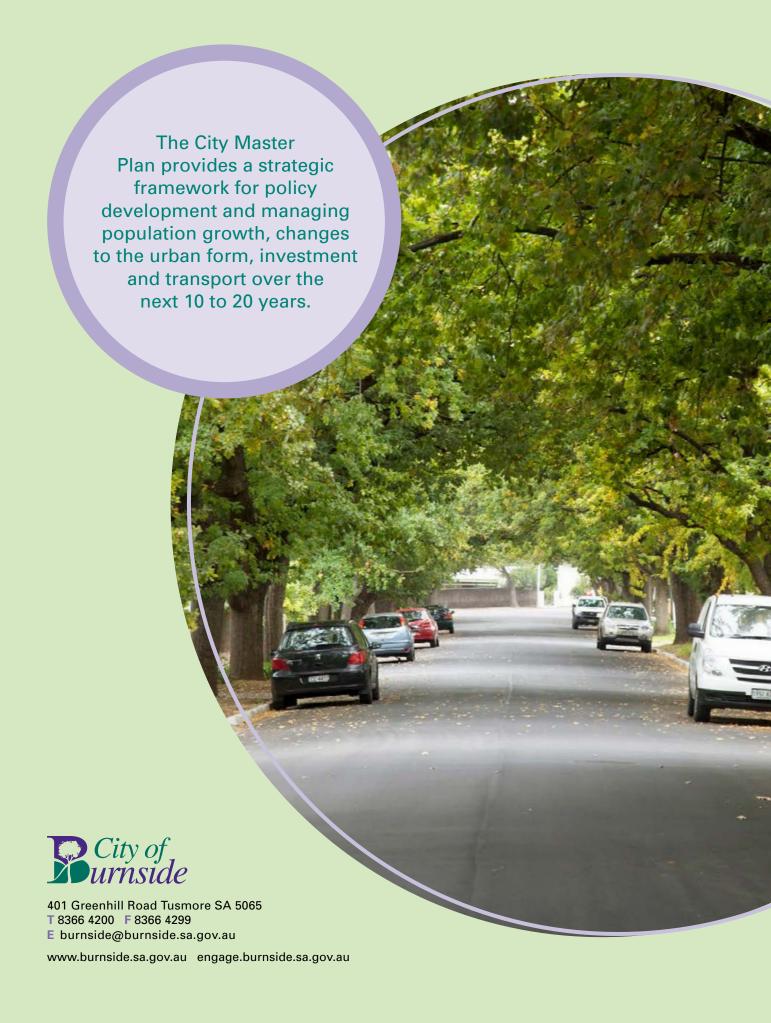
- Timing of individual site redevelopment, subject to initiation by the owner.
- Development will be assessed against existing or new policy in the Planning and Design Code.
- Neighbours' consultation only for some application types as determined by the Planning and Design Code.



Learn more

A large number of interrelated strategic investigations and projects were identified in the Burnside City Master Plan and its supporting Action Plan. For the latest information including, status of subsequent consultation opportunities, please visit engage.burnside or contact us on 8366 4200 or email your query to burnside@burnside.sa.gov.au





ATTACHMENT B – DISCREPANCIES BETWEEN THE BURNSIDE CITY MASTER PLAN AND THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

(refer Burnside City Master Plan for detailed reference)

Discrepancy

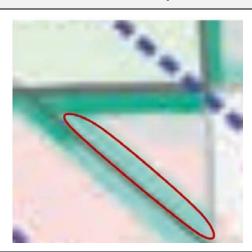
Location Map

Glen Osmond Road (Eastwood)

The Discussion Paper earmarks the section of Glen Osmond Road shown in the map at right as a mass rapid transit investigation area with a corridor investigation area on both sides of the road.

The land highlighted in red in the map at right is within the City of Burnside and contains ten Local Heritage Places with varying site widths and areas available to the rear for any new development. As such, this area has not been identified for corridor growth in the Burnside City Master Plan.

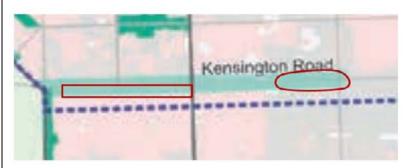
Without further details and timing on the proposed mass rapid transit mode, the City of Burnside cannot support this investigation area.



Kensington Road (Rose Park, Toorak Gardens and Leabrook)

The Discussion Paper identifies the sections of Kensington Road highlighted in red in the map at right for corridor investigations. This is inconsistent with the Burnside City Master Plan.

There is a high concentration of Local and State Heritage Places along Kensington Road, with little to no space in behind the places themselves for increased density outcomes. Flooding and drainage issues along Kensington Road also make strategic infill projects challenging in this area. Accordingly, the City of Burnside does not support these areas for corridor investigation.



Greenhill Road, Dulwich/Toorak Gardens (northern side)

The Discussion Paper identifies the section of Greenhill Road highlighted in red in the map at right for corridor investigation.

A portion of this area is covered by an existing Historic Area Overlay, which is identified for retention under the Burnside City Master Plan. Accordingly, this area is not supported by the City of Burnside for corridor investigation.



Location Map

Greenhill Road, Glenside (southern side, west of Portrush Road intersection)

The Discussion Paper identifies the section of Greenhill Road highlighted in red in the map at right for corridor investigation. This is inconsistent with the intentions of the Burnside City Master Plan which identifies this area for 'precinct based' managed growth where increased development opportunities are envisaged but where tree canopy, front landscaped setbacks and the availability of on-street parking through minimising driveway crossovers is preserved.

Greenhill Road is currently serviced by the 820/821/822 route, with a bus stopping around every 30 minutes or so. As identified by the Burnside City Master Plan, Greenhill Road would benefit from the introduction of a Go Zone in order to support any increase in precinct-based density.



Greenhill Road, Tusmore / Hazelwood Park (northern and southern side, east of Portrush Road intersection to Glynburn Road)

The Discussion Paper identifies the area highlighted in red in the map at right as an area for corridor investigation. A large section of intact Historic Area is located along the northern side of Greenhill Road, Tusmore with demolition control that will prevent a large portion of this corridor from being realised. The Burnside City Master Plan retains this protection and does not support the area for corridor investigation.

Without a Go Zone, increased density along the eastern section of Greenhill Road will only serve to increase congestion in peak periods. While some walkability may be achievable in both the eastern and western directions towards the existing centres (Burnside Village, Devereaux Road and Glynburn Road 'The Precinct') the barriers posed by both Portrush Road and Glynburn Road, make this trip unsafe and less likely.



Location Map

Magill Road, Magill (east of Penfold Road)

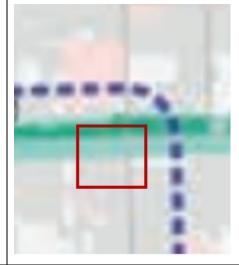
The Discussion Paper identifies the corridor highlighted in red in the map shown at right for corridor investigation. This is inconsistent with the Burnside City Master Plan which identifies this area for 'precinct based' managed growth, based on the distance of this area from the Adelaide CBD. A 'precinct based' approach for this area is also consistent with the Magill Village Master Plan and the intent of the recently completed \$13.5 million Magill Road redevelopment that was partially funded by the State Government.

Any growth in this area should aim to create a vibrant mixed-use precinct that will accommodate a compatible mix of medium density residential development. Future investigations and any zoning changes should seek to manage the interface with adjoining residential areas



Magill Road, Kensington Park (intersection of Glynburn Road and Magill Road)

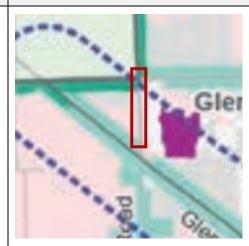
The Discussion Paper identifies the area highlighted in red in the map shown at right for corridor investigation. This is inconsistent with the intentions of the Burnside City Master Plan and Magill Village Master Plan which both identify this area for 'centre based' managed growth to take advantage of the recently completed \$13.5 million Magill Road redevelopment which was partially funded by the State Government, as well as the retail and commercial services which are already offered in the area.



Location Map

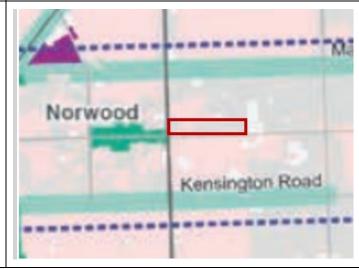
Fullarton Road – western side (Eastwood)

The Burnside City Master Plan identifies the area highlighted in red in the map at right for investigation as an area for 'corridor' managed growth (or similar). This has not been identified in the Discussion Paper.



The Parade, Beulah Park (northern side, between Portrush Road and Gurrs Road)

The Burnside City Master Plan proposes that the area highlighted in red in the map at right be investigated as an area for 'corridor' managed growth (or similar). This has not been identified in the Discussion Paper.

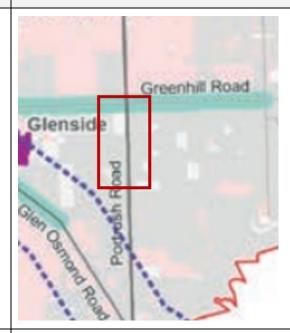


Location Map

Portrush Road, Glenside/Linden Park

The Discussion Paper does not identify the area highlighted in red in the map at right for neighbourhood and centre investigation, and only a small strip along Greenhill Road is identified for corridor investigation.

The Burnside City Master Plan identifies this area for investigation for centre-based managed growth.



Glen Osmond Road, Glenunga/Glen Osmond

The Discussion Paper does not identify the area highlighted in red in the map at right for corridor or neighbourhood and centre investigation.

The Burnside City Master Plan identifies the area for investigation for corridor managed growth.



Location Map

Conyngham Street, Glenside (identified in Discussion Paper for Strategic Infill)

The section of land in the southern portion of the former Glenside Campus land highlighted in the red in the map at right has been identified in the Discussion Paper for potential strategic infill.

Further information and detail is requested by the City of Burnside to consider any identification of this particular piece of land for further strategic infill, particularly in light of the recent infill development that has already occurred in this area and the existing health services which are still in operation.



Conyngham Street, Glenside (not identified in Discussion Paper or Burnside Master Plan)

Immediately east of the strategic infill site identified in the Discussion Paper (refer above) is a large section of predominantly state-owned land currently zoned Business Neighbourhood (outlined in red in the map at right).

The Business Neighbourhood Zone envisages community facilities, consulting rooms, offices and small shops. Mixed-use development is not envisaged.

While not specified in the Burnside City Master Plan, the City of Burnside believes the current use of this land to be strategically limited. Given its proximity to public transport, the CBD and Burnside Village, there are opportunities for this land to be considered for a combination of residential infill and the creation of needed recreational open space.

The City of Burnside offers to work with the State Government to investigate the potential of this land to meet the intent of the Burnside City Master Plan.

Any future use would be dependent on detailed investigation of impacts on local traffic, existing and proposed adjoining development and existing trees and vegetation.



DTI:PlanSA Submissions

From: Nigel Litchfield <

Sent: Monday, 6 November 2023 9:32 AM

To: DTI:PlanSA Submissions

Subject: Campbelltown Council Feedback for GARP discussion paper

Attachments: Feedback to SPC re Greater Adelaide Regional Plan Discussion Paper.docx

You don't often get email from

Learn why this is important

Nigel Litchfield

Manager Planning Services







The City of Campbelltown is committed to providing our customers with excellent service. If we can assist you in any way please either telephone (08) 8366 9222 or visit our website.

CONFIDENTIALITY:

The content of this email is confidential and intended only for the named recipient of this email. If the reader of this email is not the intended recipient you are hereby notified that any use, reproduction, disclosure or distribution of the information contained in the email is prohibited. If you have received this e-mail in error, please reply to us immediately and delete the document. The City of Campbelltown advises that, in order to comply with its obligations under the State Records Act 1997 and the Freedom of Information Act 1991, email messages sent to or received may be monitored or accessed by Council staff other than the intended recipient.



6 November 2023

Mr Craig Holden State Planning Commission PO Box 1815 Adelaide SA 5001

Dear Sir,

Greater Adelaide Reginal Plan Discussion Paper

At its meeting on October 17, 2023 the Council determined to provide the following feedback to the consultation concerning the Greater Adelaide Reginal Plan Discussion Paper.

How should we grow?

There is a significant disconnect in current Planning Policy for low and medium density Suburban infill development between ongoing urban intensification and the aspiration for a greener urban form.

The general trend for housing development over the last 30 years is for houses to be bigger, for there to be more outdoor paved areas and for there to be less soft landscaping. This has resulted, even in one for one redevelopment and low density one for two redevelopment, in significant loss of green space and canopy cover.

Councils tree canopy monitoring over the last 5 years has identified that the vast majority of canopy loss has occurred on private land.

Current Policy settings in the Planning Code do not support the laudable aspiration for a greener urban/built up area. This needs to be directly addressed in the next iteration of the GARP to provide the impetus to make appropriate adjustments to the Planning Code.

The majority of new housing stock developed as part of the concerted and successful push for greater levels of infill development has been three bedroom, single or double storey dwellings.

This is significantly at odds with the trend in average household size which is shrinking. The next iteration of the GARP needs to recognise this anomaly and



address the gap between the type of housing being constructed and the more diverse needs of households going into the future.

Providing a more diverse range of housing across the suburban area can also be a factor in addressing housing affordability.

The external and internal amenity of infill housing varies greatly and relies heavily on the individual designer or builder. Current policy settings in the Planning Code do not provide sufficiently robust guidance for Council to make meaningful interventions to achieve better outcomes at the application stage. Making significant changes at this stage is also expensive which leads to reluctance on the part of owners/developers.

Other measures which involve dialogue between a developer and a relevant authority are voluntary and only sporadically used.

The 'Deemed To Satisfy' requirements for infill and general housing which can be assessed by Private Certifiers do not necessarily result in quality design and there is no real incentive for a Private Certifier to seek amendments to a design which technically satisfies a specific provision.

The next iteration of the GARP needs to address the quality of infill housing to provide an imperative for amendments to the Planning Code.

Council supports the discussion papers focus on living locally/walkable neighbourhoods.

It is acknowledged that in established areas there is a degree to which the applicability of this is limited by existing development patterns however, protecting, enhancing and maximising local employment zones, encouraging opportunities for appropriate home based businesses and maximising residents access to local shopping services and open space are appropriate goals for all Local Government areas.

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 policies that will enable our communities to achieve this outcome in less than 25 years.

As this GARP is about growth, much stronger alignment is needed for it to support and enable the complete transition to net zero (eg Net Zero buildings, electrify everything, solar and wind generation land, higher density living, new transmission lines, reduced transport use etc).

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 this transitional climate risk. The move to 7 NatHERS stars, slated to commence in South Australia on 1 October 2024, partly addresses this, however 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.

The Commission's commitment to achieving 'a greener, wilder and climate resilient environment' is noted however it is considered that 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 of 16.7%, well below global benchmarks. 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 efforts from Local Governments who have been planting tens of thousands of trees each year, Adelaide's overall canopy is declining.

The primary cause of this 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, has a myriad of exemptions that voids protection for many of those trees, and a lack of an adequate tree valuation mechanism to facilitate investments in canopy 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 (eg through review of utility and road clearance regulations). These processes need to be systemically reviewed to create a default for tree protection (rather than the current default of tree removal) that has driven Adelaide's canopy down to such alarming levels.

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.

As a general approach, the GARP could focus on adopting 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.

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 (ie 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 (ie 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 the physical and mental health of the occupant. As Greater Adelaide shifts from being a Mediterranean to a semi-arid climate, providing 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 site composition and orientation, materials and design, shading, green space and retaining trees on site as a matter of course, not an exception.

With the National Construction Code energy efficiency change from 6 to 7 stars in SA now being delayed to October 2024, Staff believe this is 12-month lost opportunity to introduce higher standards for homes built in SA.

While acknowledging this factor, it is also vitally important to acknowledge that the SA 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 SA to change this around, meeting population growth and housing supply targets, while addressing housing affordability and 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.

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.

This consideration also needs to acknowledge that the built environment has a key role in supporting and meeting South Australia's Net Zero 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.

Where Should We Grow?

Council is supportive that greenfield growth on the urban fringe is focused around employment nodes as this has the potential to create viable walkable satellite communities. Land releases need to be strategically linked to when local employment opportunities come on line. Thought should be given to increasing diversity employment opportunities in these nodes.

All fringe growth needs to be supported by adequate social and physical infrastructure including mass transit. The State Government needs to ensure that it has an infrastructure plan to match the GARP.

Council acknowledges the need for ongoing general infill development provided that the parameters around site areas and frontages are not altered and more work is undertaken to improve the quality of outcomes as identified previously. It is noted that to some degree that these opportunities will become scarcer over time as suitable allotments are used up.

Medium rise uplift along corridors, particularly those which have access to high frequency public transport will continue to be a valuable tool to focus infill development and maintain amenity in less accessible areas. More work needs to be done on policy settings to ensure that this type of development creates a high level of amenity and sustainability

Adelaide is already experiencing the effects of the changing climate, and these effects will increase over the life of the GARP 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 (particularly greenfield development), we need to consider the climate conditions a century into the future, this is how long the effects of the decisions will be felt. We can choose to build in resilience for new neighbourhoods or

choose to build in vulnerability. We must take this opportunity now to build sustainable, liveable, healthy and affordable growth areas for our future.

2090 is the latest year for which we have high-confidence climate data. 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 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 DEW in 2022. It says that by 2090, Adelaide could experience 121% more extreme rainfall days, 79% more days of extreme heat (35C+), 64% more severe fire danger days, and 61cm of sea level rise. These are significant changes. 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 coastal and riverine inundation, urban heat and greening, and bushfire risk to minimise the vulnerability of current and future generations, and the liabilities for current and future Governments.

The proposed Dry Creek development area is already expected to be mostly under water in the highest tide events. At the end of the Century, the entire site is expected to be inundated. Developing this site is likely to build in vulnerabilities and costs to both occupants and Governments. For example, clean-up costs are often un-insured and fall to Governments to cover. A 2019 estimate from the Insurance Council of Australia put the average clean-up cost per property at \$50,000, making the potential uninsured cleanup cost for this planned district at \$500M per flood event.



DTI:PlanSA Submissions

Jim Gronthos From:

Tuesday, 14 November 2023 11:08 AM Sent:

To: DTI:PlanSA Submissions; Murphy, Benjamin (DTI)

Cc: Bruce Williams; Craig Daniel; Paul Sutton

Subject: Formal endorsed submission by Charles Sturt Council - Greater Adelaide Regional Plan

Discussion Paper

You don't often get email from

Learn why this is important

Hi Ben,

Attention: Growth Management Team

Following its meeting on 13 November 2023, please find attached Council's endorsed submission for consideration by the Growth Management Team with regards to the Greater Adelaide Regional Plan Discussion Paper, meeting the extended deadline granted by the Team Leader of the Growth Management Team.

Please disregard the previous draft submission that was submitted to the Department on 6 November 2023 to meet the required consultation deadline and remove it from any Department publications.

If you have any questions, please do not hesitate to contact me.

Thank you and kind regards

Jim Gronthos **Senior Policy Planner Urban Projects**

(Monday to Thursday)

www.charlessturt.sa.gov.au

Files attached to this message

Filename Size Checksum (SHA256)

Endorsed Charles Sturt

for the GARP Discussion

Council

360 Submission KΒ

ada1a7880d0e458335883eff118d9405aba7db236452a3f4bef0b93b328c4650

Paper -13

November 2023.pdf

Endorsed Charles Sturt

23.4

aff5068a8726cadec7ab7093737826cad1b3884566fecbb4c784318a0c01a651

Residential MB Land Supply

Study, 2023.pdf

Please click on the following link to download the attachments:

This email or download link can be forwarded to anyone.

The attachments are available until: Thursday, 14 December.

Message ID: 7FYMKGoeLn84Tu0Cs7zQnP



The City of Charles Sturt acknowledges and pays respect to the traditional custodians of the land, the Kaurna people of the Adelaide plains.

Go Green - Think before you print

This initiative forms part of our environmental plan

Warning - This email message is intended only for the addressee(s) and may contain information that is confidential, subject to legal or other professional privilege, or protected by copyright. If you have received this in error, please notify the sender by reply email and delete this email from your system. You are not permitted to use, reproduce or disclose the contents of this email. No representation is made that this email is free of viruses. Virus scanning is recommended and is the sole responsibility of the recipient. Thank you.









72 Woodville Road, Woodville, South Australia 5011 PO Box 1, Woodville SA 5011 T: 08 8408 1111 F: 08 8408 1122 charlessturt.sa.gov.au

13 November 2023

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

EMAIL: plansasubmission@sa.gov.au

Dear Sir/Madam,

City of Charles Sturt Submission on the Greater Adelaide Regional Plan Discussion Paper

The following is an endorsed submission by Council from its meeting on 13 November 2023, on the Greater Adelaide Regional Plan (GARP) Discussion Paper (the Paper) to meet the extended deadline granted by the Growth Management Team.

Council wishes to thank the Commission for the opportunity to provide comment on the Paper to inform the development of a draft GARP, which is anticipated to be released for consultation in 2024.

The City of Charles Sturt has taken the opportunity to consider the information contained in the Paper. The following are key matters for consideration as well as further comments tabled in **Appendix A**.

Current Housing Supply within the City of Charles Sturt

The release of the State Government's Greater Adelaide Regional Plan Discussion Paper, 2023 presented the City of Charles Sturt with an opportunity to reflect on the last 10 years of residential growth and consider what current housing supply this has generated for our city and what might need to be done to continue to provide a further 30-year housing supply should this be Councils objective.

Council has prepared a study which presents a review of progress to date, current population and housing supply projections, where changes need to be made to improve development outcomes whilst still creating some pathways for growth consistent with local community needs and State Government expectations. A copy of the study is attached.

Council's residential growth capacity has highlighted that on average over the last 10 years 690 new dwellings have been created in Charles Sturt annually. This rate of growth will accommodate future high growth targets identified by the State Government.

Council has approximately 22,000 housing allotments capable of being subdivided based on current Planning and Design Code policies. Many of those allotments will not be subdivided for a number of reasons. These include the ageing and character of the home, landowners' preference for larger allotments or capital improvements made over time to the existing residence making demolition unviable. There are also several commercial realities including owners' appetite for risk and ever-increasing subdivision and building costs.

Based on advice from PLUS, Council has approximately 7,348 allotments that are likely to be subdivided over the next 15 years taking into account several commercial factors. This number is not static but a point in time.

Based on (high) projected population growth and no development control policy changes Council considers there is housing supply for approximately the next 24 years based upon general infill (including conservative estimates of new infill sites becoming market ready) strategic infill (master planned communities where land has been rezoned), centres zones and corridor potential development. The estimate of approximately a 24-year supply horizon is based on a high growth scenario of 700 dwellings per annum.

While Charles Sturt may potentially have capacity for further growth this needs to be finely balanced with maintaining amenity in existing neighbourhoods, preserving existing historic and employment areas and potential future character areas, minimising traffic impacts, improvement on public transport infrastructure, and aspiring to a high level public open space and tree canopy. Therefore future potential growth capacity in Charles Sturt should not be considered by the State as absolute and any proposed targets highlighted by the GARP should proportion the responsibility of future growth across neighbouring areas.

Short-term priorities for Council

Based on the above, Council's short-term priority is to consider preserving and enhancing the liveability of our communities in areas most impacted through general infill.

Council intends to pursue the initiation of a Character Area Overlay Code Amendment in 2024, with Council's previously endorsed Residential Streetscape Character Study, 2013 to be used as a basis for the investigations. The key intent will be not to introduce demolition controls, which can only occur if an area is contained within an Historic Area Overlay, but to ensure that new infill development can be designed in a manner to respect and enhance the prevailing streetscape character of discrete areas.

Another short-term Council priority involves areas of the City most affected by general infill and the issues it has presented to Council. An urban planning and infrastructure precinct plan is proposed to be developed in the central part of the City of Charles Sturt referred to as the Your Neighbourhood Plan. The scope of this Plan will seek to address key infrastructure issues and required policy reform to offset the negative impacts of unmitigated general infill.

Further to this, Councils medium term priorities include investigating future housing, recreation and employment growth within the City's key Centre Zones as well as to investigate the long-term viability of Strategic Employment and Employment Zoned land through a comprehensive City-wide review of all Employment and Strategic Employment Zoned areas (as detailed below).

General infill growth

Whilst assisting in renewing housing, providing housing diversity and housing supply for the GARP, general infill is generally not well received by those surrounding these sites and is considered not to adequately contribute to resolving the problems it generates. These issues include on-street parking, road network congestion, loss of tree canopy, increase heat island effect, increase stormwater runoff, loss of streetscape and neighbourhood character and lack of public open space. The current contribution of approximately \$7,800 per allotment to then meet the costs of acquisition of open space where infill is occurring is grossly inadequate.

The development of the draft GARP needs to demonstrate how the Government will address infrastructure investment for general infill growth into the future with regards to an integrated State Government rapid transport service in areas of high general infill growth that reduces reliance on private car use. The draft GARP also needs to demonstrate how the planning system and legislative amendments can assist to expand existing neighbourhood parks in suburbs experiencing significant infill where population to open space benchmark ratios are not being met. As detailed above a greater open space contribution should be derived from land divisions in these areas. Current contribution is less than 20% of true cost of the land equivalent. Compulsory acquisition powers for the purposes of public open space should be explored.

Future general infill development should also be complemented with further Planning and Design Code (Code) reforms. There are several potential Code policy reforms and legislative amendments which should be considered by the Government to improve the amenity of areas that are experiencing general infill. Such issues include but are not limited to:

- Carparking and storage for dwellings Carparking size in double garages need to be increased to allow for people to park and exit their vehicles within the garage space, reducing the impact of private vehicles parking on public streets.
- **Storage in dwellings** further policy is needed in the Code to address short falls of domestic storage which often leads to garages being utilised as quasi storage areas further exacerbating the impacts of parking on public roads.
- Off-street car parking provisions Consideration for off street car parking ratios to
 ensure a minimum of two spaces are provided on-site for dwellings, regardless of the
 number of bedrooms.
- **Urban Tree Canopy Off-set Scheme** Specific Zones should not have the option to pay out in lieu of planting a tree where there are significant benefits in ensuring trees are planted.
- **Tree canopy** Amendments to policy to ensure sufficient setback to allow for a potential tree in the rear yard.
- **Public Realm Tree Planting** Improve criteria for greater consideration being given and demonstrated for alternative design solutions and the retention of street trees.

- **Private Open space** The provision of private open space based on <301m2 = 24m2 is not considered sufficient given 300m2 is the maximum site area for most dwelling types in Council's General Neighbourhood Zone (the most common residential type of zone in the city). Amendments should be considered on policy based on a sliding scale depending on the size of the site.
- Regulated trees The broadening of the legislative definition for Regulated and Significant trees can capture a greater number of trees in a locality. Future tree damaging activities triggering a development application are given the appropriate scrutiny before such actions are undertaken. This provides greater opportunity to maintain and improve on urban tree canopy in the metropolitan area.
- Public open space contribution and public infrastructure contribution (as detailed above).

Strategic infill

Consistent with the 2011 City of Charles Sturt Residential Growth and Character Study and subsequent endorsed Section 30 reviews under previous legislation Council has progressively supported or led 12 Development Plan Amendments (DPAs) / Code Amendments that have assisted in the delivery of master planned communities with an estimated yield of approximately 8,848 dwellings. As at May 2023, approximately 2,896 dwellings have been generated with a further approximately 5,085 new dwellings anticipated to be generated over the coming 15 years.

In context to identifying future strategic infill site opportunities in Charles Sturt the following are key learnings from these previous rezoning processes.

- Land that is currently not generating a revenue and has dilapidated assets and in single ownership are the essential ingredients to drive owners' interest in a change in use and private sector investment in housing.
- Despite these being master planned sites with 12.5% open space the surrounding community are highly sensitive to any medium to high density housing such as apartments and perceived traffic impacts. As such, future potential sites need to be investigated carefully to mitigate potential adverse impacts.
- Where ownership is fragmented and or generating a return for the landowner very little
 of the land rezoned has progressed to land division and construction stage highlighting
 that policy uplift alone is not enough to generate market activity.
- Few if any sites now exist in Charles Sturt that are of scale, in single ownership and not providing important local employment.

Existing Centre Zones

The City of Charles Sturt has several existing centre type zones (Urban Activity Centre Zones and Suburban Activity Centre Zones) which under the existing zone policy provide an opportunity for future dwelling growth and present an opportunity given their proximity to established services, transport network, public transport.

The existing zone policy supports generally medium density dwelling outcomes (if and when there is market demand) provided future residential development does not prejudice the operation of existing non-residential development and the long-term provision of services and facilities for wider community benefit. The need to maintain and create additional retail and commercial land uses in and around centres to service the potential population growth will also need to be considered as part of future in these areas.

While the existing Centre Zones provide an opportunity for future growth in Charles Sturt further detailed investigations would be required on a case-by-case basis on matters including but not limited to land ownership, location of public open space to support future growth, location of EPA licensed areas, interface with non-residential land uses and land use mix, interface with any heritage places (State heritage, Local Heritage and areas within a Historic Area Overlay), public transport and traffic management, environmental assessment and stormwater management.

Transit corridors

The Paper under the heading "Where we can Grow?" references urban corridors playing an important role in providing growth opportunities.

The Suburban Business Zone in the City of Charles Sturt predominantly occurs along a portion of Grange Road and Port Road and along other key arterial networks in Charles Sturt including Tapleys Hill Road, South Road, David Terrace, Torrens Road and Findon Road. The Zone policy already supports generally medium density dwelling outcomes that does not prejudice the operation of non-residential activity within the zone (dependant on market demand).

The Paper indicates the Urban Corridor Zone which has been introduced along other arterial road networks within Greater Adelaide could be expanded to other sites with Figure 10 in the paper highlighting Port Road, Grange Road and Torrens Roads as possible corridor investigations areas.

Given Charles Sturt's current anticipated housing supply based on existing Code policy from general infill sites, strategic infill sites and existing potential in key centre type zones and the existing Suburban Business Zone along key arterial corridors, Council is of the view that any proposed rezoning of its existing urban corridors is considered a more longer-term priority.

Any future investigations to consider rezoning the City's urban corridors should only occur subject to State investment in improved rapid public transport, to accommodate this potential residential growth and uplift for the transit corridors of Grange Road, Port Road and Torrens Road. Investigations should also consider the appropriate land-use mix including additional retail and commercial to support the growing population.

Future investigations to rezone the City's existing urban corridors should also consider issues such as fragmented land ownership, location of public open space to support greater uplift, interface with established location of EPA licensed areas, interface with established lower density residential land uses and non-residential land uses and land use mix, interface with heritage (State heritage, Local Heritage and areas within a Historic Area Overlay), traffic management, environmental assessment and stormwater management.

Employment lands

The City of Charles Sturt contains approximately 438.8 ha of Strategic Employment Zone and Employment Zoned land. The most recent review of Charles Sturt's Urban Employment Land in 2019 identified 8 precincts considered as the City's prime employment zoned lands and other areas were identified as secondary precincts which still provide further contribution to the City's local economy.

Over 54 percent of total economic output is contributed from businesses located in the employment land areas, at approximately \$7.43 billion. Total output for the Council area is \$13.73 billion (Remplan, 2023).

It is noted that the Paper has highlighted some of the City's prime employment land as proposed areas of investigations for potential neighbourhood regeneration (refer to Figure 11). This is in conflict with the City of Charles Sturt Urban Employment Land Review's 2019 strategic direction and Figure 15 (p158) in the Paper – Proposed areas of investigation, Employment growth which identifies the Athol Park and Woodville North Prime Employment Areas as Employment Growth Investigation Areas.

It is also noted that the Paper has highlighted the City's Hindmarsh triangle as a potential investigation area. The area consists of largely Strategic Employment and Employment zoned land and is identified by Council as one of its prime employment areas.

Data from REMPLAN shows that the Hindmarsh employment areas provides for around 60.7 jobs per ha, which is the highest of all of the City's employment zoned areas.

Council considers this area a longer-term priority to consider as a potential mixed use environments with potential residential land uses given its location to major transport options, CBD employment, Port Road District Centre, River Torrens Linear Park and, Parklands amenity.

Over the last 15 years many hectares of employment zoned land in this location has been rezoned to either Urban Core or Urban Corridor Zones eg. south of the River Torrens, the Brewery site, development at Bowden (MAB site) and the rezoned land at Bowden Brompton (Detmolds etc) as competing areas. A large portion of this is yet to produce housing supply and Council seeks to adopt a cautious approach to encourage development of the existing rezoned areas whilst maintaining local employment lands close to this anticipated population growth.

Council strongly supports the retention and regeneration of these Strategic Employment Zone areas for employment uses and protecting them from encroachment from sensitive land uses.

It is estimated that the Athol Park and Woodville North employment precincts contribute \$1.985 billion of annual output to the local economy and provide approximately 1500 jobs (PlanSA - Land Supply for Greater Adelaide 2021 and Remplan, 2023).

A State-led comprehensive review of the GARP's Strategic Employment and Employment Zones focusing on individual LGAs is needed before any rezoning decisions are considered to understand the capacity of areas proposed for future growth to ensure sufficient areas for employment opportunities are maintained. It is understood that a State-led employment land strategy is anticipated in 2024. This body of work should be completed and local governments provided with an opportunity to review the findings prior to the development and release of the draft GARP for consultation.

Protection and regeneration of Strategic Employment and Employment Zones in Western Adelaide and the City of Charles Sturt should be a key focus in the preparation of the Government's GARP.

It is recommended that the State Government's review of Strategic Employment Lands considers the demand and supply in the existing metropolitan area and the need for new employment land is not limited to the consideration of the urban fringe and growth areas.

Figure 11, p141 – Port Rd, South Rd Corner Employment Area is identified as a Strategic Infill site. The rezoning of this precinct would result in the loss of an estimated 437 jobs and output loss of \$0.25 billion per year. This needs further investigation before a decision on rezoning is determined. Rezoning to residential use is not supported. It is recommended that the Port Road and South Road Employment area is removed as a strategic infill opportunity site until a review of Strategic Employment Lands is undertaken.

Traffic management

A key issue for Council in the Paper is an understanding of the State Government's future commitment to cycling and public transport infrastructure to support this anticipated future housing and population growth. 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.

The preparation of the draft GARP should provide an understanding of this including a broader public transport strategy that defines what investment will be made to take the demand off vehicle commuter use. The draft GARP should consider as a minimum the potential to extend a tram or train network between the Grange line to West Lakes Shopping Centre and the West development (as detailed in the 30-Year Plan for Greater Adelaide-2017 Update – refer to Map 7 – Major transport and public transport investment) and a broader strategy for corridor investigations for Grange Road, Port Road and Torrens Road. Public transport should not just be a consideration if critical mass is already there rather it should be invested in areas now where anticipated growth is to occur and therefore run the apparent 'loss' until the population numbers catch up to ensure these areas are viable into the future.

The Paper has highlighted in Figure 10 a mass rapid transit investigation area between Grange Road in Charles Sturt and south of Henley Beach Road in the City of West Torrens. The development of the draft GARP needs to define what this investigation area means. Given the Paper highlights potential corridor growth investigation areas along Grange Road, Port Road and Torrens Road, any future mass rapid transit investigations should be extended as a minimum over these areas.

The draft GARP should also demonstrate what plans/commitments are in place for future improvements to key intersections within Charles Sturt and intersections that neighbour Charles Sturt to support future growth.

The Paper is also silent on active/sustainable travel and does not provide a strategic context. The growth of housing and population in the draft GARP should demonstrate a commitment from the State Government for on road bike networks through the centre of the Council area. 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. As an example investment should consider kerb separated bike lanes along Trimmer Parade and down Crittenden Road to Grange Road to service this growth area and to connect to the broader strategic cycling corridors. Greater strengthening of a public transport corridor and cycling corridor on Grange Road is needed. Future growth also needs to be supported by a state commitment to complete the Grange Greenway corridor.

Social licence

Social licence or social acceptance needs to be strongly invested in the development of the GARP and through its eventual consultation process to the community within Greater Adelaide. While the theory of seeking greater feedback at the strategic level of the State's Planning System is sound it can often miss its objective and leave community seeking answers at the end of the planning process when the physical construction occurs. It is important to ensure that future consultation of the GARP can reach all communities and that the language used to promote the intent of the GARP is easily understood.

Council's experience with undertaking Code Amendments over the last 10 years has involved direct mail out to those affected with easily understood literature explaining the objectives of the proposed rezoning. This has proved successful in both getting the message out and generating interest from the community to provide their feedback.

It is recommended that the Government ensure a suitable budget is in place for the future consultation of the GARP and consider a direct mail-out method within Greater Adelaide, particularly in locations that are earmarked for further investigations and possible policy changes. While other consultation mediums are important such as advertisements, use of webpage platforms, Council has found through its experience that direct mail-out to those affected provides the critical information directly to the residents who can then decide to participate further in the process.

For the community to gain a better understanding of infill outcomes, the Commission should consider holding public walking tours of different developments so that people can gain a better real life understanding of the different growth opportunities and talk to an expert about the pros and cons of each site shown.

In many respects the intent to create satellite cities such as at Murray Bridge and Goolwa/Victor whilst reducing the focus on a denser city with general infill targets is because many of the local communities' concerns have failed to be addressed. Communities generally understand the need for a denser city to protect environmental sensitive and food production areas but seek better designs to address the general infill issues experienced. Rather than focus on growth in greenfield areas and on major road corridors that in Council's view will only further increase car dependency the response should be a doubling down in an integrated way and engage with local communities around education, public transport, urban renewal and planning, health and with local government as a collaborative partner. This approach to expand into greenfield areas and on urban corridors may be considered cost effective but unlikely to deliver the future city our community desires.

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; how and where the associated urban development occurs; and where Aboriginal cultural heritage needs to be identified, protected and preserved.

Living locally

The Paper refers to 'Living Locally' by locating housing, employment and services closer together so people can meet most of their daily needs within a comfortable distance for walking, riding or use of public transport and is supported as an approach by Council. The City of Charles Sturt commenced a Your Neighbourhood Plan (YNP) in 2020, which aligns with the intent of the Paper's proposed approach. Living Locally/Local Neighbourhoods is also emerging as a strong theme through Council's Community Plan review process which further supports a focus on this space.

The City of Charles Sturt YNP process has involved a broad consultation, gap analysis, project options and prioritization, and consideration of Councils Asset Management Plans and Long-Term Financial Plan. YNP is a project-based program which addresses gaps in proven liveability elements such as local parks, local shops, and walkable streets to get to these places without driving. Accessible frequent public transport, sustainable development, local employment, education, health, social services, retail, entertainment and opportunities to connect are other important elements of great liveable neighbourhoods that are taken into consideration. Greater consideration within the draft GARP needs to be given to integrate local area planning such as the YNP with increased State Government funding, participation and support in general infill areas.

Without Government intervention to compel the market to respond there is a risk of establishing new residential areas without increased infrastructure and matched developments needed to make living locally, and enjoying a high quality of life for those living/working/visiting there, actually possible.

Demographic change

The Paper highlights the trends in our Region's demographics in terms of its composition, as one of the key factors which has fuelled housing demand and influencing housing affordability. The Paper highlight's that the average household size is decreasing with single person households having increased by 78% over the last 30 years. The Paper also highlights that the GARP will support housing growth by prioritising strategic growth and encourage a broader range of dwelling types and dwelling sizes.

As part of the State's Planning System the Paper highlight's the Commission's intention to undertake a Future Living Code Amendment. Its objective is to facilitate greater choices for people who may wish to downsize and stay in the same area or enter the market on a smaller footprint. The Code Amendment may propose new co-housing forms and future living models in established areas. The outcomes of this future Code Amendment will be reviewed at a later date but noting that this Code Amendment's investigations currently only apply to several local government areas within the GARP.

While consideration of housing supply is important to consider in the draft GARP and through future Code Amendments, other mechanisms such as State tax changes are needed to be explored in unison and put in place to complement future housing growth opportunities made possible through the State's Planning System.

As an example one area which is not explored in the Paper and sits beyond the influence of the State's Planning System is the consideration of State tax amendments to financially incentivise households to consider changing locations that may be more suited to their current circumstances.

As a further example, the increase in smaller households identified in the Paper may reside in larger homes/land parcels within Greater Adelaide. While there may be a desire to downsize to a smaller dwelling product to better meet their needs and thereby free-up existing larger homes for larger households, there may be a reluctance to do so because of anticipated stamp duty fees. Without tax changes these existing larger dwelling products will remain locked up with smaller households for the foreseeable future. Other stamp duty concessions should be considered on households with low to moderate incomes to incentivise these households to seek housing products more suited to their needs.

<u>Demographics and social trends – strategic planning for the needs of older people and people living with disability</u>

We are living longer, but not healthier. South Australia has the highest proportion of older people on mainland Australia, with more than 630,000 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.

The principles of *living locally* are aligned to age-friendly communities but need to go further. There is need to consider land uses that enable ageing in place, given most older people live independently. Land use planning is needed that enables local accessible and diverse housing options, however we also need local retirement villages and aged care facilities, so that people can stay within their neighbourhoods close to family connections and social supports in order to access increased supports as they age.

There is an opportunity to embed into the GARP evidence-based ageing friendly principles. Public transport planning needs to align with the demographic trend of an ageing population.

GARP should be consistent with the Principles of Good Planning which include universal design practices. Although often enacted at the building regulation or public realm level, the goals of Universal Design could still be explicitly expressed in the GARP to reinforce the built environments of the future are adaptable and accessible to the widest possible range of household types, and that people living with disability are able to live close to the services and supports that enable their independence and uphold their rights to dignity and choice.

Local and social infrastructure

This requires assessments on the capacity of social infrastructure in existing neighbourhoods, and/or planning of new social infrastructure for major infill developments. While the Paper identifies the need for major infrastructure it is important that modelling is also systematically undertaken for social infrastructure capacity and the additional demand that comes from increased residential density. Without this consideration this may have a negative impact on the social licence for further urban infill if local communities cannot gain access to infrastructure such as local childcare centres, schools or sporting clubs.

Short-stay accommodation

A recent phenomenon which is having an influence in housing supply which has affected the State's long-term rental capacity involves the rise of short-stay accommodation through internet platforms. This issue is not addressed in the Paper. Some statistics currently place South Australia's rental vacancy rate at 0.5%, which has been a progressive decline since 2017. The rise of short stay accommodation has influenced this trend by decreasing supply of long-term rental accommodation from the market and in turn has attributed to increasing cost of rental accommodation.

As with above, some issues cannot be solely addressed through the State's Planning System and further State-wide mechanism's need to be considered. One such method currently being explored in Victoria involves the introduction of a levy on short-stay accommodation platforms, with the revenue generated used to fund future social and affordable housing projects. This is an initiative that should be considered for implementation in South Australia.

Public Open Space

The Paper highlights opportunities for growth through greenfield sites, growth of satellite cities but also through urban infill growth. Urban infill growth has been characterised by strategic infill sites, along arterial corridors, regeneration of neighbourhoods and existing centres and through general infill in established residential areas.

Urban infill growth presents several opportunities such as the utilisation of established services and infrastructure reducing the impacts and costs associated with urban sprawl to areas of environmental significance and the State's food production and wine regions. However, urban infill growth also presents challenges which need to be carefully managed such as increased traffic management and the potential erosion of the urban tree canopy. An important issue which must be addressed through legislative changes to support future housing growth within the urban environment is the provision of future public open space to support this anticipated future urban infill growth.

Strategic infill presents a realistic opportunity to provide new public open space through the development of a large strategic sites. This has and continues to occur in the City of Charles Sturt. However, many of the obvious opportunities for rezoning strategic sites to facilitate future housing growth in Charles Sturt are becoming less. This reduces future opportunities to seek new public open space through rezoning strategic sites.

The Paper's consideration of urban infill growth through potentially arterial corridors and general infill areas needs to be considered more broadly in terms of how new areas of public open space can be delivered in these areas to support this potential growth. Future growth from general infill and arterial corridors are not like strategic sites and often involve fragmented land ownership of sites of a size that would not trigger the legislative requirement for physical public open space.

Future growth through general infill and through potentially arterial corridors needs further legislative changes for open space contribution required per new allotment. The current figure at approximately \$7,800 per allotment is inadequate given the cost of land per square metres in these inner-city locations that councils must pay to expand existing reserves to support this new growth.

The current legislative provision of 12.5% is also not considered sufficient to address future higher density residential environments and needs to be increased. Where remaining strategic sites exist legislative changes needs to be made to increase this provision to cater for the anticipated higher residential densities. Known strategic sites in our experience such as Bowden, West development and Peet development at St Clair and the recent Council approved SA Water site at West Lakes have all included public open space contributions above the legislative requirement to compensate for thew higher residential densities.

Potential utilisation of public-school ovals should be considered to compensate for open space short falls in areas impacted by general infill.

The legislation also has loopholes that can be exploited. When creating more than 20 dwelling allotments there is a requirement that a minimum of 12.5% of a development area be provided for public open space or monetary contribution. Applicants can therefore create a land division proposal of less than 20 allotments to avoid direct physical contribution to Council. Further to this, the City of Charles Sturt experienced this despite it being a strategic site, subject to a Code Amendment and a concept plan depicting the location of the open space being included withing the Code. The developer lodged two 15 lot land divisions and paid money in lieu of land in an area where open space was deficient. Our legal advice indicated that we had to assess the 15-lot land division on its merits, approval was granted, money paid and critical open space not provided. It is far more profitable for developers to pay the \$7,800 per allotment than to contribute public open space. Without this loophole being addressed, further opportunities to expand limited public open space will be lost.

Urban greening

Trees and green spaces are essential for human health. Current statewide efforts to maintain and expand tree cover and urban greening are at risk of being uncoordinated and inadequate to meet targets. 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.

Infrastructure Contribution

To support future growth further mechanisms are needed to enable funds to be collected through the future creation of allotments for housing. The current Infrastructure Scheme in the PDI Act is too complex and detailed hence not readily used. None have been initiated since the previous pilot schemes. There should be a more simplified process for new development to contribute into an infrastructure fund similar to the open space fund when allotments are created to enable funds to be used by local governments to undertake future public infrastructure improvements to accommodate the GARP's anticipated growth to fund, traffic and stormwater management impacts and open space and social infrastructure requirements.

The Commission should consider the Victorian Infrastructure Contributions Plan which imposes contributions on the development of land to fund the provision of infrastructure in the subject area or outside the subject area if a need has been generated by the developable area or funds to secure the provision of land for public purposes in the developable area.

Other impacts on housing growth

The GARP should consider how future growth can be maximised in areas where zone policy encourages greater uplift. Charles Sturt has several strategic sites that encourages medium to higher density but over the course of these master planned developments some envisaged densities and building heights have not been fully developed. The GARP should consider how areas that have policy which envisages greater uplift can ensure the intent of the policy can be fully realised. Possible considerations that could be explored include policy changes in the Code to require minimum building heights and amalgamation incentives of sites to maximise density potential and improve design outcomes.

<u>GARP – changes in other Government Agencies</u>

For the outcomes of the GARP to be successful it will be important to demonstrate how the GARP will stimulate future changes in other Government agencies to support the proposed outcomes for Greater Adelaide including as examples:

- A greater choice of housing in the right places Improved public transport infrastructure by the State to support proposed future growth.
- A greener, wilder and climate resilient environment How State-led future transport infrastructure projects can improve on tree canopy targets?
- A greener, wilder and climate resilient environment How State-led agencies can
 influence unlocking open space in existing public-schools for surrounding communities
 where anticipated growth is proposed to occur or how the State can influence SAPN
 standards for street tree management under overhead power lines and improve PLEC
 funding in areas of high general infill growth to improve tree canopy opportunities.
- A greener, wilder and climate resilient environment Consideration of legislative amendments beyond the State's planning system for the reliance of future gas connections.

The Role of Renewal SA

The recent purchase by the Government of the former West End Brewery site is welcomed to ensure the site can maximise its full potential for diverse housing opportunities in a key strategic location. However, large strategic sites such as the former brewery are becoming less common and, in many ways, can be delivered effectively by the private sector provided appropriate policy and associated controls are put in place by Government. The long-term purchase of smaller sites in strategic locations to amalgamate overtime as future key strategic sites that then can be released to the market is a far more challenging and essential process.

The Government should consider the role of Renewal SA as a critical tool to support and lead the roll out of affordable and sustainable housing. A long-term purchase strategy and land banking of smaller sites in key strategic locations should be at the forefront of the Agency's role to enable these sites to be amalgamated over time to create future housing growth opportunities in Metropolitan Adelaide.

Affordable Housing

Current commitments by the State government to retain all SAHA dwellings should be extended to build more low-rise medium density affordable and social housing in the areas zoned for this purpose. Within the City of Charles Sturt there are 24 Housing Diversity Neighbourhood Zoned areas totalling approximately 331ha. Thirteen (13) of these zoned areas have a high mix of South Australian Housing Authority homes totalling approximately 108ha. There are approximately 2,880 SAHA dwellings in Charles Sturt¹ (¹ Source: South Australia's contribution to Public Housing and State-Owned Housing data collection, SA Housing Authority, 2021). Two significant areas include Seaton and Semaphore Park. The benefits of redeveloping these areas with improved amenity and well-designed medium density housing should be encouraged to provide greater housing choices for a diversity of household types.

The Affordable Housing target in the Act is also currently 15% and given the current housing crisis in the State an increase of this percentage through the legislative change should be considered by the Government.

A greener, wilder and climate resilient environment

Climate change presents significant risks and opportunities for the built environment and our communities as Greater Adelaide continues to grow.

The Government has acknowledged the need for urgent climate action through its climate emergency declaration (May 2022) and the development of down-scaled climate science data to understand localised impacts, and commitments within its climate change strategies, including '(Action 5.1, South Australian Government Climate Change Actions) Strengthen climate smart planning, building and design policies and their implementation in the planning system'. Although not specifically 'in scope', the GARP should harness this opportunity to influence low emission and climate resilient planning and development outcomes for the future.

Policy aimed at addressing responses to climate change need to be included in the State's Planning and Design Code to ensure climate risks are considered and planned for as part of all forms of development and for all dwelling types and non-residential uses. It also needs to apply to State agencies so that housing for people that need support is sustainable for them in relation to living costs (refer to Action 5.5 South Australian Government Climate Change Actions, Support climate smart development for public housing, affordable private dwellings and urban renewal projects). Climate risks need to be understood to enable diligent decision making for both public and private assets. An Urban Heat Overlay (data prepared by State) and Coastal Hazards Overlay (mapping required) needs to be considered in the Code.

It is critical that environmental, and Climate Change policy is included in the Code and the National Construction Code that includes improvements for energy use and consumption. All housing should exceed the minimum energy efficiency standards in the National Construction Code. Other improvements through the National Construction Code should consider requiring double glazing, solar, appropriate orientation, white roofs etc for all infill development (not just master planned sites).

Better thermal efficiency means lower energy bills, more comfortable homes, more resilience at times of extreme weather, and lower carbon emissions. It furthermore reduces pressure on the energy grid, reducing infrastructure costs and enabling the broader transition from centralised fossil fuel-powered electricity systems to renewables and distributed energy resources. The upfront costs of higher thermal performance are significantly outweighed by benefits to households. Additional monthly mortgage payments on a 7-Star home are typically less than the bill savings, meaning that households are financially better off from day one.

Council looks forward to a review of the anticipated draft GARP in 2024.

Should you have any questions, please contact Jim Gronthos, Senior Policy Planner on by email at

Yours sincerely

Bruce Williams
General Manager City Services

Appendix A – Greater Adelaide Regional Plan Discission Paper – Feedback by Charles Sturt Council

No.	Topic	Comments
1.	Page 19 – Principle to guide the GARP's scope and preparation	 Consider an additional principle regarding the quality of life, livelihood and liveability as a central purpose to the future development of the draft GARP.
2.	Page 35 – 12 major trends and drivers	 Tree canopy loss is a significant trend and while there is always a need to balance competing needs through the State's planning system between housing supply, population growth, urban consolidation, etc, it should be cited as a key trend.
3.	Page 37 – Question: What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there other outcomes the	Consider the transition to low carbon and circular economy – local manufacture (reducing transportation emissions, shoring up supply options), decarbonising industrial processes and movement of goods, taking advantage of the State's renewable energy to position our State as a green supply chain and growing employment opportunities.
	Commission should consider?	 A growth strategy should have a strong focus to also provide local employment, enabling a shift to lower emissions lifestyle.
4.	Page 37 – Question: What other major trends and drivers might shape the future of Greater	Significant investment in defence and renewable energy industries in the coming decades – the GARP should consider industries needed to support this growth in employment and convenient housing and neighbourhoods.
	Adelaide? How should a land use plan address these	 Cost of living pressures – how can greater Adelaide's growth plan support social housing / low-income housing options?
	trends and drivers?	 Planning for recreation and tourism opportunities within Greater Adelaide – supports economic prosperity, to be done well could benefit from planning opportunities to develop land for this purpose across Greater Adelaide.
		 First Nations connection with country – economic, cultural, environmental benefits – where can this be planned to occur? What is the impact to Country and culture of expansion of satellite cities?
		 Adelaide is moving from a Mediterranean to a semi-arid climate. This should be the major driver in our approach to change.
		Given current rates of private automobiles, SA is unlikely to have a low carbon fleet of private cars in the near-term

No.	Topic	Comments
		future. Greater focus to integrated active transport (walking and cycling) to embrace the "Living Locally" challenge.
		 Public and active transport corridors need to be designed and built into the fabric and interconnectivity of new growth areas.
5.	Page 38 – A greener wilder and climate resilient environment	 The draft GARP should include minimum canopy performance standards for development – with a focus on retention as mandated and derogations from this mandate needing a convincing business case as to why.
6.	Page 49 – Figure 2 – Ideas to promote active transport	 Another concept considered missing here is the need for well- treed environments which can promote active transport as they make walking, cycling and connections to public transport more comfortable and therefore attractive as an option.
7.	Page 50 – Natural Hazards	This section focuses on bushfires, flooding and coastal inundation. It is suggested that this section should also refer to heat. Heat is linked to many deaths through acute and chronic heat events.
8.	Page 57 — Question: What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient	 Trees and tree loss are largely silent in the Paper. This is an issue for SA and is not specific in the Paper by bundling it with biodiversity, heat etc but not explicitly naming the issue. The recognition of the myriad of benefits of trees to the wellbeing of people and communities and to the protection and enhancement of the environment is increasing nationally
	environment?	and globally. Parallel to this the recognition, is the observed decline in the urban forest and tree canopy cover in the City of Charles Sturt and other Councils within South Australia, having been impacted primarily by the effects of a changing urban environment such as infill development.
		 State Government has a responsibility to arrest the wide- spread decline of tree canopy on private land driven by limited tree protection laws and push for urban densification through infill development.
		It is incumbent on our state legislators to act in recognition of the decline in canopy enabled by State legislation.
		The Paper takes a very non-committal approach by virtue of the following (page 42) "Complementary approaches Some planning interventions achieve both mitigation and adaptation outcomes. For example, the planning system might promote urban greening which stores greenhouse gas emissions while also helping us to adapt by cooling our

No.	Topic	Comments
		suburbs as average temperatures rise." Plan would benefit
		from action drive approaches and commitment to outcomes.
		 The urban forest should be recognised as an adaptation to manage impacts of climate change (pg43) but as a 'complimentary approach" which foreshadows a lack of commitment to provide urban forests as an important component of the GARP.
		 Recognition that the climate is changing and there is a risk to public and private green assets and future selection of appropriate tree species to survive and buffer climate impacts while providing biodiversity and habitat.
		 Plan for biodiversity within the urban environment. Develop linkages and protect areas to sustain urban biodiversity (the coast, rivers) and ensure these are identified in overlays within the Code.
		SPP1 – ideas for the GARP:
		 Identify areas that should be set aside (not developed) to link urban biodiversity and cooling corridors throughout Greater Adelaide.
		 Create an enabling environment for the retention of existing vegetation and regulated and significant trees on private land. Existing regulation is having perverse outcomes of people removing these assets before they reach 'regulated' status.
		SPP4 – ideas for the GARP:
		Biodiversity even in urban areas needs to be valued and supported to avoid collapse of ecosystems. Suggest the planning system protect existing urban vegetation where possible or require contribution to biodiversity outcomes within developments to enable a greener and wilder and climate resilient environment.
		 SPP14 – ideas for the GARP: Collaborate with local governments to understand stormwater volumes of growth plan and the impacts to the management of stormwater system, to understand the risks of flooding and the cost impacts on councils to manage this impact. Insurance availability/affordability is becoming increasingly dependent on climate hazard risks, particularly flood risk, so improving planning decision making around this will be an important outcome for our community.
		Recognition of constraints created by constraints to tree planting created by proximity and location of underground

No.	Topic	Comments
		and overhead services, key being SA Water infrastructure, as well as stormwater, telecommunications, gas and other services and primarily SAPN electricity network infrastructure. Page 55 – SPP4 – biodiversity – focus on protection requires a complimentary approach to include restoration and creation of biodiversity.
9.	Page 64 Question:	 Pg 56 – SPP15 – missing 'heat' as a hazard Population scale health impacts from living in hot suburbs – loss of large trees / large canopy expanses. Cost of living pressures from climate maladaptation (e.g., private homes that respond poorly to extreme heat). Insurance cost and impact on economy by continuing to build un-insurability into our built form. Transition to zero carbon regenerative buildings. Transition risk of adopting active transport lifestyles in a heating climate – role of electric micro-mobility solutions in addressing this. Inadequate infrastructure to assist in migrating to car free / car lite urban developments. Restoration of creek lines and biodiversity corridors, stormwater management to support urban greening and biodiversity, and the rezoning and regeneration of degraded industrial sites are examples of this shift in approach. Social cohesion is not well-defined or described. The draft
9.	Page 64 Question: What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?	 Social cohesion is not well-defined or described. The draft GARP will need to better articulate what this means and what contribution land use planning will make to it. Equity and social inclusion may be better references with stronger established evidence base. There is potential for quite different understandings and views on what social cohesion for Greater Adelaide looks like. For example, social housing can be seen as important to have a diverse mix of socio-economic demographics in a new housing area, however it can also attract stigma and entice exclusion. Conversely the benefits of responsible increased urban infill are often misunderstood (although justified when poorly executed) with commentary such as references to being 'future slums of the sky' and 'people living in dog boxes'. Development needs to take its citizens along for the ride – the first step of this is demonstrating good and responsible development, and land use planning. Capitalise on learnings of recent development through review and consultation with the new communities to improve future developments.

No.	Topic	Comments
		Provide open spaces in strategic locations and develop acquisition strategies to ensure these can be sourced and obtained. Provide diversity in open space development to ensure our new developments are inclusive for the demographic to provide for.
10.	Page 72 – Question: What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?	 Identify opportunities for virtual power plants (VPPs) and community batteries and encourage the establishment within key redevelopment sites and key buildings within strategic locations. Identifying through spatial planning employment lands that are vulnerable to climate change impacts – for example sea level rise and flooding from peak storm activity.
		 Identify public and active transport corridors and associated residential lands to support the transition to "Living Locally". Identify locations for micro-grids, embedded networks and VPPs to increase capacity of renewable energy generation while reducing impact of grid demand from energy intensive industry.
11.	Page 74 - 'A greater choice of housing in the right places'	The importance of developing housing in areas that provide options for non-car based / sustainable transport for residents and communities. Developing in areas where there is no commitment to service through public transport will exacerbate the challenge of rapidly decarbonising our transport systems.
		 Across all 'choice of housing' these should adhere to strengthened sustainability standards fit for climate change including all electric, energy and water efficiency, thermal performance, optimise orientation and design for passive design outcomes, greening for cooling and canopy, cool and sustainable materials that can be deconstructed and reused at end of life.
		Mitigation of emissions and NetZero are positive and aspirational and should be the driver, but we should not forget or discount that adaptation is inevitable due to impacts from past emissions already being locked in. This therefore means that we need to better account of risk within the way that we develop Adelaide – key risks for Western

No.	Topic	Comments
		Adelaide are flooding (SLR, storm surge, peak events), extreme heat and storms (wind action on structures).
		 Insurance risk will be the biggest emergent impact on the economy and land use planning has a key role in ameliorating this. Where we build, what we build provides important guidance (Source: Southern & Hills Local Government Association).
12.	Page 86 – Question: What neighbourhood features enhance living and working locally?	 Resilient, climate adapted street trees to protect residents from the extremes of climate. All streets, homes, suburbs built around Water Sensitive Urban Design principles that support and enhance the presence of water in the landscape to green and cool our environment and provide irrigation opportunities to support and enhance the establishment of trees. Ensure that there are green, living spaces and mature, tall trees around homes to buffer the impact of extreme heat. Consider the concept of "canopy areas" to be established, with corresponding deep root zones, desirably to the rear of properties, which will allow for the creation of green corridors to support nature-based services and biodiversity to cool and green at a household lot-level out. Deliver resilient housing that is affordable, not just in terms of purchase price, but in the long-term liveability. Housing that is resilient to climate extremes and economical to live in. Housing should be able to protect / buffer the resident from climate extremes in the absence of electricity for short periods of time. All housing should exceed the minimum energy efficiency standards in the National Construction Code, be checked at point of delivery using quantitative methods to provide quality assurance (e.g., through blower door and thermal camera analysis) to the end user and assessed against standards of net zero and regenerative design. Public transport everywhere. Well-connected, high-quality, reliable, frequent and fast public transport that has multiple interchanges that operate along dedicated corridors. High-quality linear and networked active transport infrastructure that is integrated with the public transport, allowing local mode shift, active transport park and ride with secure end of trip facilities at all interchanges. Active transport infrastructure needs to account for e-bikes — the fastest growing segment of personal mobility in Australia, and be designed to allow fast, conti

No.	Topic	Comments
		 Public and active transport corridors and associated network infrastructure needs to be planned, designed and constructed before and at the very least, in conjunction with land releases. Infrastructure will drive certainty and options for residents to adopt low carbon mobility solutions. More choice is required to direct change and expose residents to different transport choices. The public realm needs to place walking and cycling first. The design of footpaths, local roads, cross overs, shade trees, end of trip facilities (e.g. bike lock-ups) all need to be obvious. Electric everything. No reticulated gas requiring legislative changes in future developments. Network electricity infrastructure designed to account for bi-directional capacity of rooftop solar and additional renewables in the grid. Electric vehicle charging infrastructure at all public buildings, at scale, and provisioned for growth in demand and capacity. Walkable and bikeable neighbourhoods that allow more local trips to be undertaken without necessarily using a car. Lower speed limits in local streets of 40kph or less to reduce impact of speed, noise, air pollution and emissions. Ensure growth has access to high-quality, reliable, cost effective NBN or other network infrastructure to allow working from home options such as telecommuting to reduce transport related emissions.
13.	Page 127 – Question: How can infill development achieve an urban form that is consistent with the principles of Living Locally?	 More high-density development in inner and middle suburbs. Greater diversity in where we live including locations, types, number of bedrooms, the way we finance and different tenure options. Recognise that all South Australians have a right to quality housing that is well located and accessible. Trees and green space are vital assets that contribute to community wellbeing, amenity, cooling and climate resilience. Educate the community on the whole of life costs of living in buildings including health, running costs (e.g., power), productivity, social connectedness and adaptation to a changing climate. Well-designed and strategic infill will play an important role in enabling people to live close to the city. Significantly increase the supply of quality housing that is affordable and well located. Well located housing, jobs and services closer together so people can meet most of their daily needs within a comfortable walk, ride or public transport journey. Recognise that there will need to be choice and flexibility to meet demographic change. Provision of well-designed well-located housing needs to be considered in a holistic way that contributes to community

No.	Topic	Comments
		health and wellbeing, productivity, affordable running costs and climate resilience.
14.	Page 147 – Growth of advanced manufacturing	 Manufacturing is acknowledged as a major employment and output sector in the City of Charles Sturt. It is currently the fourth largest employment sector (8.6%) and highest output sector with over \$3 billion (21.9%) per year. The Discussion Paper acknowledges the growth driven by investment in defence at Osborne which will have a flow on effects for the strategic employment lands in the Council area and particularly those in close proximity. These precincts include: Athol Park, Woodville North, Royal Park, Woodville and Hendon. It is important to support the protection and regeneration of these strategic employment lands for ongoing employment uses. (Remplan, 2023)
15.	Page 147 — Diversification of business type located in employment precincts.	The fourth dot point acknowledges the need to balance city-fringe housing with employment needs. The Hindmarsh triangle, identified in the Discussion Paper as a Strategic Infill area (Figure 11 – Urban activity centres and neighbourhood regeneration), presents an opportunity to achieve residential growth (uplift) along with growth in knowledge- intensive activities. This area links to the Thebarton bio-science precinct and is flanked by the former West End brewery site, Bowden Village and the Brompton former gasworks sites. The master planning and consideration of the optimal land use mix of this precinct requires further investigation and would likely present a longer-term regeneration opportunity.
16.	Page 150 – Current Employment Land	 The increase in demand for vacant employment land since 2021 is acknowledged and this demand has been experienced in Western Adelaide. There is a shortage of suitable available land to meet the expansion needs of existing businesses that would like to remain in the region. The need to protect existing employment land is strongly supported. The City of Charles Sturt has undertaken regular strategic reviews of employment land and has rezoned five precincts, comprising 121.2 hectares which represents 21.6% of employment land since 2008. It is not considered that there are any further areas of employment land that are surplus to requirements that should be rezoned to non-employment uses at this point in time. A review of Strategic Employment Lands in the City of Charles Sturt will be undertaken to help inform the State Government's investigations into Strategic Employment land supply in Greater Adelaide.
17.	Page 153 — Traditional Freight	Last dot point, the importance of 'Adelaide's West as the most significant region within Greater Adelaide for both traditional and freight and logistics employment activities' is

No.	Topic	Comments
	and Logistics – Future Demand	acknowledged and strongly supported. It is critical that the Strategic Prime Employment Lands in the City of Charles Sturt are protected from encroachment by sensitive land uses and supported through regeneration for employment outcomes.
18.	Page 155 – Knowledge Intensive – Principles & Future Demand	Comments related to the Hindmarsh triangle were outlined above (refer to page 147, Diversification of business type located in employment precincts.)
		The preparation of the City of Charles Sturt Economic Development Strategy 2022-2026 included a background paper prepared by ID Consulting Economic Trends and Forecast Report. The report identified a shortfall of local knowledge intensive and higher-level employment opportunities for residents which is increasing the need to travel to areas outside of the Council area and region. The growth of the knowledge intensive businesses and opportunities will assist in addressing this shortfall which has been forecast to continue. The inner-city areas including the Hindmarsh triangle, Bowden and Brompton along with the GigCity Precincts at Hendon and Welland present opportunities to grow the knowledge intensive sectors.
19.	Page 157 – Population serving, Principles and Future Demand	Future demand for additional employment land for population serving uses is identified for the fringe growth areas where population growth is anticipated. It is considered that additional employment land incorporating population serving uses will also be required to service the existing metropolitan area where significant increases in population are forecast. The City of Charles Sturt will consider this issue as part of a strategic review of employment lands.
20.	Page 158 – Figure 15 – Proposed areas of investigation, employment growth	The map identifies the Athol Park and Woodville North Strategic Employment and Employment Zone areas as Employment Growth Investigation Areas. Council strongly supports the ongoing use and regeneration of these strategically important Employment Zones for employment uses and protecting them from encroachment from sensitive land uses. A review of Strategic Employment Lands in the City of Charles Sturt will be undertaken to help inform the State Government's investigations into Strategic Employment land supply in Greater Adelaide.
21.	Inclusion of minimum standards	In consideration to future built form and green infrastructure there should be consideration for minimum standards of performance and quality. Whether the draft GARP is the correct instrument or better addressed in the Planning Design Code and or the National Construction Code, the draft GARP should make some reference to the need for minimum standards.

No.	Topic	Comments
22.	Missing content	 The GARP needs to remain focused on social equity realised through access to quality housing that is cost effective to live in (operational cost) and designed to withstand a changing climate over the lifetime of the home. The GARP should not drive car dependant suburbs on the fringe of Adelaide in the name of "housing affordability". The GARP should address climate risk as the key motivator to change and proactively set the integrated framework to deliver a robust, climate resilient city. Energy efficiency is the low hanging fruit of improving housing standards. Predicative and performance-based assessment needs to form part of every development application at planning assessment and not left to building rules assessment when it is too late / too costly to modify the design. Houses need to be checked for compliance with energy efficiency and climate design standards prior to handover – this needs to be embedded in the planning. Liveable Housing Design standards should be for all new developments to allow for ageing in place and being able to live in home if resident circumstances change. Mandatory disclosure scheme of energy / climate standards at point of sale or lease should be established to benchmark existing properties and bring them up to contemporary standards.









72 Woodville Road, Woodville, South Australia 5011 PO Box 1, Woodville SA 5011 T: 08 8408 1111 F: 08 8408 1122 charlessturt.sa.gov.au

Charles Sturt Council Residential Land Supply Study, 2023

Charles Sturt Residential Land Supply Study, 2023

Contents

1.	Executive Summary	4
2.	Introduction	5
3.	Background	6
4.	City of Charles Sturt Principles Governing City Wide Growth	8
5.	Key Trends and Demographic Analysis – City of Charles Sturt	9
	5.3 Population Growth and Dwelling Growth	. 10
	5.4 Average Household Size by City	. 10
	5.5 Change in Household Size 2016-2021 - Australia	. 11
	5.6 Population Distribution by Age – 2021	. 12
	5.7 Percentage of Population in One Person Dwellings – 2006-2021	. 14
	5.8 Diversity of Housing	. 14
	5.9 Housing Suitability	. 15
	5.10 Population by Landlord Type	. 15
6.	2021-2051 - City of Charles Sturt Population and Dwelling Projections – August 2023	. 16
7.	Infrastructure Assessment	. 18
	7.1 Essential Infrastructure	. 18
	7.1.1 Water Assets	. 18
	7.1.2 Roads And Traffic	. 18
	7.1.3 Public Transport	. 20
	7.1.4 Essential Utilities	. 22
	7.1.5 Green Infrastructure	. 22
	7.1.6 Social and economic infrastructure	. 25
	7.1.7 Activity Centres - The Neighbourhood Heart	. 26
	7.1.8 Economic Development and Employment Precincts	. 26
8.	Existing and Future Potential Residential Growth Opportunities	. 29
	8.1 General infill	. 31
	8.2 Strategic Infill	. 34
	8.2.1 Current Strategic Infill Site Assessment	. 34
	8.2.2 Future Strategic Infill site uplift	. 35
	8.3 Retail Centres	. 37
	8.3.1 Current Centres assessment	. 37
	8.3.2 Future Potential Centres Uplift (refer Appendix 1 Map 18 for these locations)	. 38
	8.4 Transit Corridors	. 38
	8.4.1 Current Corridors assessment	. 38
	8.4.2 Future Potential Corridor Uplift	. 40

9.S	9.Summary of future Residential Growth Opportunities43			
10.	10.Investigation Priorities			
11.	. Conclusion	46		
Арр	pendix 1	47		
	Map 1 - Stormwater and Flood management	48		
	Map 2- travel time delay	49		
	Map 3 – Key intersections of interest	50		
	Map 4 - Black Length, Black Spot Locations	51		
	Map 5 - Public Transport Frequency and Accessibility	52		
	Map 6 – Urban Heat Island	53		
	Map 7 - Distance to Reserve- Regional, District Local and Neighbourhood	54		
	Map 8 - Street Tree Planting Program to 2025	55		
	Map 9 – Social infrastructure	56		
	Map 10- Social Infrastructure – Education	57		
	Map 11 – Local Activity Centres	58		
	Map 12- Urban Employment	59		
	Map 13 – General Infill	60		
	Map 14 - Strategic Infill	61		
	Map 15- Retail and commercial Zones	62		
	Map 16 –Your Neighbourhood Plan - Central Area	63		
	Map 17 –General Infill Hotspots	64		
	Map 18 –Potential Growth Corridors	65		

1. Executive Summary

- A review of the previous 2011 Growth and Character Study demonstrates Council
 has delivered 12 Code Amendments and master planned sites since 2011 generating
 a potential yield of 8848 dwellings of which 2896 dwellings are now completed.
- On average over the last ten years 690 new dwellings have been created in Charles Sturt annually. This rate of growth will accommodate future high growth targets identified by the State government.
- On average over the last ten years almost two thirds of new dwellings have been generated through General Infill development
- Council has 22,000 housing allotments capable of being subdivided based on current Planning and Design Code policies and market forces.
- Based on allotments with capital to site ratios close to 1 (i.e. lots which are
 essentially land value only) and independent analysis of development ready
 allotments, 7348 dwellings could be generated over the next 15 years through
 General Infill.
- Based on (high) projected population growth and no development control policy changes Council has housing supply for the next 25 years based upon general infill (including conservative estimates of new infill sites becoming market ready over this time period) strategic infill, centres and corridor development. The estimate of a 25year supply horizon is based on a high growth scenario of 700 dwellings per annum.
- Guiding principles that reinforce Councils leadership role in supporting affordable and diverse housing options.
- Council's short-term focus needs to be on preserving and enhancing the liveability of our communities in areas most impacted through general infill.
- Council's medium-term focus should be on investigating future housing, recreation and employment growth within the urban Activity Centre Zones in Kilkenny, West Lakes, Westfield and the Suburban Activity Centre Zone of Port Road Hindmarsh and to investigate the long-term viability of Strategic Employment and Employment Zoned land through a comprehensive City-wide review of all Employment and Strategic Employment Zoned areas.
- Longer term investigations, subject to state investment in improved rapid public transport, will focus on residential growth and uplift for the transit corridors of Grange Road, Port Road and Torrens Road. Investigations will consider the appropriate land-use mix including additional retail and commercial to support the growing population.
- These short-term, medium-term and long-term focused actions provide housing supply out to 2057, meeting State Government high population projections for the City of Charles Sturt.

2. Introduction

With the release of the State Government Greater Adelaide Regional Plan (GARP) Discussion Paper, 2023 an opportunity exists to reflect on the last 10 years of residential growth and consider what current housing supply this has generated for our city and what might need to be done to continue to provide a further 30-year housing supply.

As such this report represents a review of progress to date, current population and housing supply projections, where changes need to be made to improve development outcomes whilst still creating some pathways for growth consistent with local community needs and State Government expectations.

3. Background

3.1 Residential Growth and Character Study, 2011

The Residential Growth and Character Study, 2011 prepared by Jensen Planning and Design for the City of Charles Sturt was a comprehensive study that aligned to the then 30-Year Plan for Greater Adelaide and had a shelf life to 2039.

The study identified housing supply of 21,000 dwellings to 2039 or on average 750 new additional dwellings per annum. The aim was to ensure approximately 14,000 dwellings, or 66% of new dwellings to be within an 800-metre radius along corridors and around Centres. This would reduce the need for rezoning in neighbourhoods outside of these growth corridors.

The proposed growth areas were focused on transit orientated development, centres and corridors and included:

- Bowden (High Order TOD)
- Cheltenham/ Woodville (St Clair) (High Order TOD)
- West Lakes (West Development) (High Order TOD)
- Seaton Railway station (Nodal Centre)
- Albert Park (Nodal Centre)
- Kilkenny (Bianco Site) (Nodal Centre)
- Fulham Gardens (Centre)
- QEH (Specialist Centre)
- Hindmarsh (Centre)
- Arndale (Centre)
- Grange Road (Corridor)
- Henley Beach Road (Corridor)
- Woodville Road (Corridor)
- Port Road (Corridor)
- Torrens Road (Corridor)

"Within Centres and Corridors, some areas are more easily to develop than others - these are the Core Areas which are the areas that are already underutilised or vacant or ready for redevelopment. However, many of the land parcels in these areas identified for future residential growth are generally

in individual private ownership and to achieve quality planned development on a larger scale that can build in WSUD and stormwater management, appropriate levels of open space, sustainable building approaches and other key planning goals, amalgamation of allotments would be desirable.

Some other areas outside these core growth areas will also experience future growth - these will include Housing SA Areas, Seaton, Findon, Kidman Park, and Ridleyton." *2011 Residential Growth and Character strategy.

These comments regarding the complexity of Corridor and Centre development remain relevant with previous corridor rezoning processes that occurred within the City of Prospect (Churchill Road) resulted in community criticism to the point that the State Government proposed DPA program within Charles Sturt was abandoned. The Ministerial DPA (code amendment) of Henley Beach Road has yielded only 1 development outcome in 8 years despite supportive policy being introduced. Since the 2011 Residential Growth

and Character Study was endorsed the following rezonings have been completed with Council support;

- Bowden (High Order TOD)
- Cheltenham/ Woodville (High Order TOD)
- Woodville Station
- West Lakes (High Order TOD)
- Seaton (Nodal Centre)
- Albert Park (Nodal Centre)
- Kilkenny (Nodal Centre)
- Kidman Park (former Metcash site)
- Kidman Park (former industrial land)
- SA Water Site West Lakes (currently under consideration)

Only the centres and corridors remain and this would appear to have far more to do with the commercial realities and inherent constraints than the lack of supportive planning policy.

Projects from the 2011 Study yet to be completed include;

- Fulham Gardens (Centre)
- QEH (Specialist Centre)
- Hindmarsh (Centre)
- Armada (Arndale Centre)
- Grange Road (Corridor)
- Henley Beach Road (Corridor)
- Woodville Road (Corridor)
- Port Road (Corridor)
- Torrens Road (Corridor)

3.2 State Context

3.2.1 The Greater Adelaide Regional Plan

The State Government has recently release the Greater Adelaide Regional Plan ("GARP")Discussion Paper, 2023, which is the beginning of an 18 month process aimed at establishing a renewed plan for long term housing supply (30 years) with associated infrastructure across the greater Adelaide region (see link here Greater Adelaide Regional Plan Discussion paper)

The Greater Adelaide region is home to more than 1.5 million people. It covers almost 11,000km2, from Cape Jervis in the south, to Murray Bridge in the east and the Barossa in the north. The region comprises the lands and waters of four First Nations peoples: Kaurna, Ngarrindjeri, Ngadjuri and Peramangk. It includes 27 local government areas ,has 84% of the state population and 80% of the states economy with a population in 2021 of 1.515 mil people.

Over the next 30 years it is anticipated Greater Adelaide could grow by up to 670,000 people which represents a 46% increase on today population,

The GARP proposes four key outcomes to guide the discussion on how we should grow.

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, regeneration future.
- 4) A greater choice of **housing** in the right places

Importantly it recognises transport as a major contributor to greenhouse emissions and also impacting on liveability advocating a more walkable urban form with better access to public transport and by supporting low emissions transport technology.

The City of Charles Sturt despite the extensive strategic and general infill growth it has delivered over the past 10 years has in many respects been abandoned by the state government when it comes to innovative public transport solutions. It would appear the only investment made relates to supporting a further increase in car dependency through the south Road Motorway and Torrens Road level crossing reducing some congestion and therefore reducing take up rates of public transport. In earlier 30 year plans a tram extension to West Lakes was envisaged at the time the land was rezoned. Post rezoning the tram extension was removed from future planning without any discussion on what alternative rapid transport system could be deployed in this growing part of our city. This continues to remain a significant concern, the disconnect at the state level between growth and infrastructure provision.

It recognises greenfields development along 4 major road transport spines as far east as Murray Bridge and to the south Victor Harbor and Goolwa, to the Northwest to two Wells Dublin and Mallala and North east towards Roseworthy and Kapunda.

The GARP also highlights the issues with general infill and the need to identify further strategic infill sites which it believes can deliver better housing choice, infrastructure and open space.

The GARP recognises Charles Sturt can continue its leading role providing further housing supply opportunities subject to more detailed investigations in areas including the City's transit corridors, employment areas of Hindmarsh and Woodville North and housing regeneration areas predominantly occupied the South Australian Housing Authority.

4. City of Charles Sturt Principles Governing City Wide Growth

- 1. Provide a regular supply and diversity of housing in Charles Sturt to enable families to stay connected, meet the needs of changing demographics and assist in meeting a growing metropolitan population.
- 2. Centres are more suitable for growth as they can be more effectively master planned when compared to existing residential neighbourhoods where general infill occurs.
- 3. There needs to be clear understanding of the current and future demand for employment lands in determining if any land use planning changes are warranted.
- 4. State Government commitment to enhance rapid public transport must accompany future growth.
- 5. Growth needs to be environmentally sustainable with better public realm outcomes including improved public open space, streetscape enhancement, and longer-term reliance on renewable energy to service new housing.

6. Costs associated with provision and augmentation of infrastructure need to be met by the developer wherever possible.

5. Key Trends and Demographic Analysis - City of Charles Sturt

Charles Sturt has consistently accommodated a significant portion of Greater Adelaide infill over many years. Some 690 new dwellings per annum have been constructed in past recent years, accommodating approximately 1,650 people each year. High dwelling demolition rates and a significant number of strategic infill developments have generated these numbers as well as offering better housing diversity in Charles Sturt than many other council areas. The age of housing stock in older and middle ring locations within Council and the substantial number of properties with closely aligned capital and site values indicates that general infill will continue to provide for some two thirds of the increase in population and dwellings although annual growth rates may slow in coming years.

Ageing population trends will impact Charles Sturt with smaller household sizes and a greater requirement for domestic and institutional dwellings suited to this cohort. The benefits of a heavy rail network covering much of Charles Sturt may diminish without a major integrated strategic State investment to leverage this infrastructure. Better and more frequent public transport is required if housing growth – including affordable housing - is to be sustained.

5.1 Affordable Housing

Current commitments by the State government to retain all SAHA dwellings should be extended to build more low-rise medium density affordable and social housing in the areas zoned for this purpose. Within the City of Charles Sturt there are 24 Housing Diversity Neighbourhood Zoned areas totalling approximately 331ha. Thirteen (13) of these zoned areas have a high mix of South Australian Housing Authority homes totalling approximately 108ha. There are approximately 2,880 SAHA dwellings in Charles Sturt¹. The benefits of redeveloping these areas with improved amenity and well-designed medium density housing should be encouraged to provide greater housing choices for a diversity of household types.

¹ Source: South Australia's contribution to Public Housing and State-Owned Housing data collection, SA Housing Authority, 2021

5.2 Intergenerational Report 2023

The 2023 Intergenerational Report (IGR) was released on 24 August, 2023 and is the fifth of its kind. The reports examines factors impacting the workforce and productivity and make projections about the next 40 years. In summary these include:

- The five main spending pressures health, aged care, NDIS, defence and interest
 payments on debt are projected to grow from one-third to one-half of total
 Commonwealth government spending. Health spending is expected to increase the
 most.
- The IGR will show life expectancy is forecast to reach 87 for men and 89.5 for women. The number of people 65 and over is projected to more than double, while the number 85 and over is projected to more than triple.
- Australia's population will be older and smaller than predicted post- COVID. While net overseas migration is bouncing back after COVID-19, cumulative net overseas

migration won't catch up to pre-pandemic levels until 2029/30, based on current forecasts.

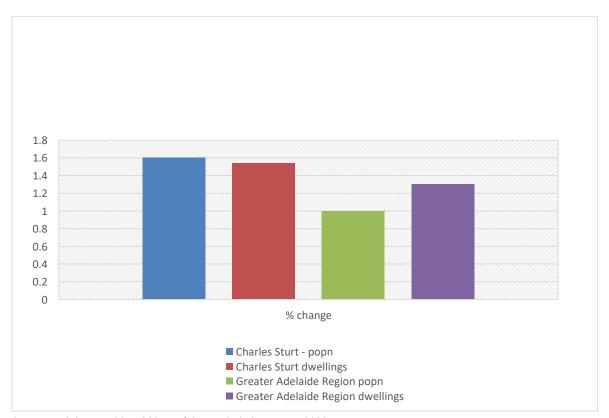
These trends will impact on residential land supply and infrastructure specifically by increasing the need for:

- dwellings suitable for more older people to 'age in place' ie smaller units/apartments
- nursing homes and retirement villages and disability institutions
- diverse (smaller, denser) dwellings which are affordable to single person households to rent or buy, and provide a sense of community, such as co-housing.
- dwellings close to major defence and health precincts.

The following key demographic graphs for the City of Charles Sturt relate to population and housing. Most Council data is compared with like data for Greater Adelaide (Greater Capital City South Australia GCCSA), not Greater Adelaide Region (GAR) for context.

5.3 Population Growth and Dwelling Growth

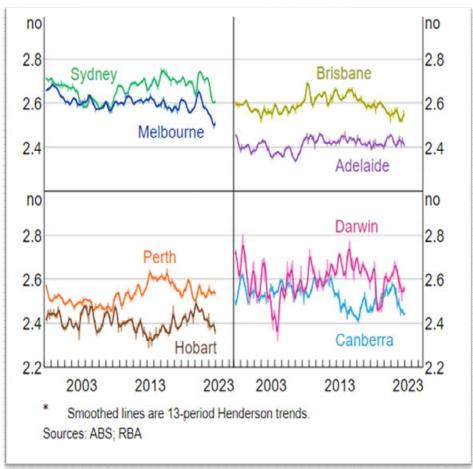
This graph shows the higher percentage rates of population growth in Charles Sturt, highlighting the crucial role Charles Sturt has played in accommodating GAR growth. The graph also shows the greater balance between population and dwelling increase in Charles Sturt, compared to the imbalance in the CCSA, perhaps due to holiday homes and second dwellings in the outer areas of the GCCSA.



Source: ABS Census, 2011-2021 and GARP Discission Paper, 2023

5.4 Average Household Size by City

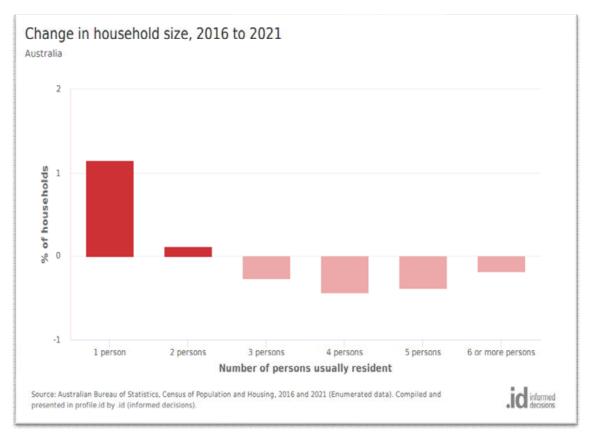
This graph shows Adelaide's Average Household Size (AHS) at around 2.4 people per dwelling, one of the lowest in the nation. ABS 2021 Greater Adelaide shows AHS as 2.5 ppd. ABS 2021 City of Charles Sturt AHS is 2.4, perhaps reflecting our greater diversity of dwellings more suited to smaller households. GARP Discussion Paper, 2023 projections indicate AHS will drop by some 8% to 2.24 persons per dwelling (ppd) by 2051, based on trends of increases in single person households (78% since 1991), couples with no children (52% since 1991) and average annual housing growth exceeding population growth in the past 10 years.



Source: ABS Census and RBA

5.5 Change in Household Size 2016-2021 - Australia

This graph shows a trend, almost certainly dominated by east coast urban data, that may come to Adelaide in time if higher density urban neighbourhoods are promoted over low density sprawl. This trend is not evident in the ABS, 2021 for Greater Adelaide nor for the AHS for Charles Sturt for 2021 which remain at 2.5 ppd and 2.4 ppd respectively.

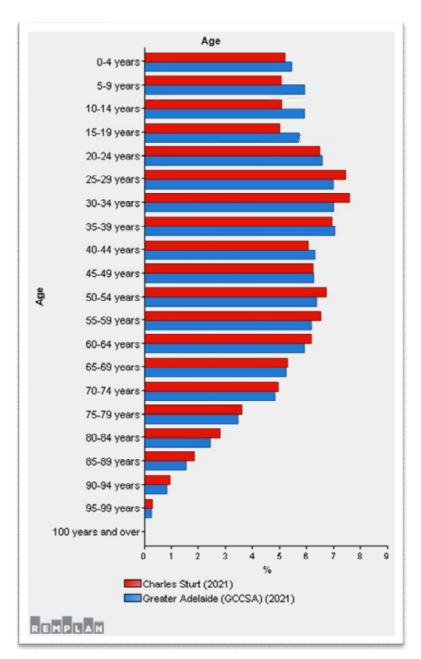


Source: ABS - 2016 and 2021 - Population and Housing

5.6 Population Distribution by Age – 2021

This graph shows:

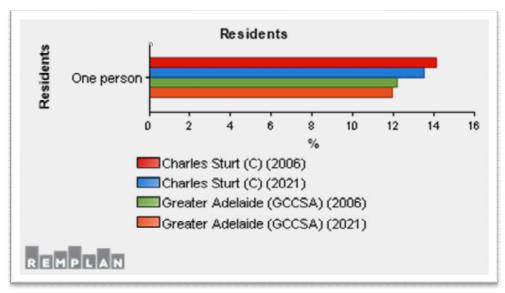
- a. The higher proportion of younger people in Charles Sturt in the 25-34 years old brackets and in 50 Plus brackets;
- b. The lower proportion of people in the 0-19 years brackets, indicating a faster ageing population in Charles Sturt in the future.



Source: REMPLAN

5.7 Percentage of Population in One Person Dwellings - 2006-2021

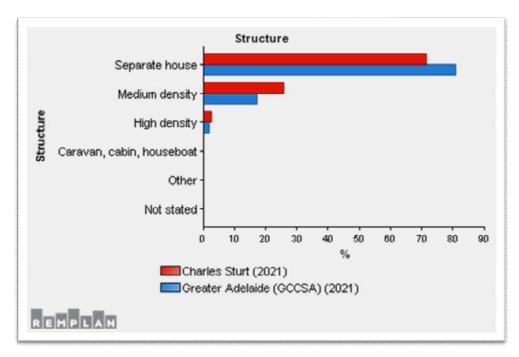
This graph shows City of Charles Sturt population has had a larger proportion of one person dwellings than Greater Adelaide population and that proportion has increased at a greater rate than of Greater Adelaide -2006 - 2021.



Source: REMPLAN

5.8 Diversity of Housing

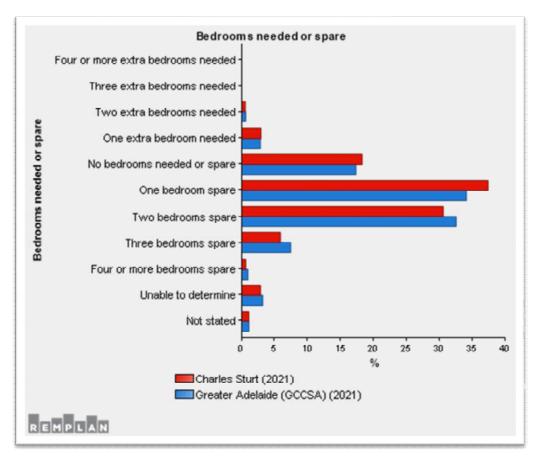
This graph shows that CCS is providing in percentage terms, more diversity in dwelling type, with less separate houses and more medium density housing than Greater Adelaide.



Source: REMPLAN

5.9 Housing Suitability

This graph shows Charles Sturt has a higher percentage of one bedroom spare (37.4 %) compared to Greater Adelaide (34.1%) and higher percentage of 'no bedrooms needed or spare'. This is showing there is better alignment between the current housing stock provided for the Charles Sturt community compared to Greater Adelaide. This aligns with the higher percentage of dwellings other than separate house shown above under Diversity of Housing.

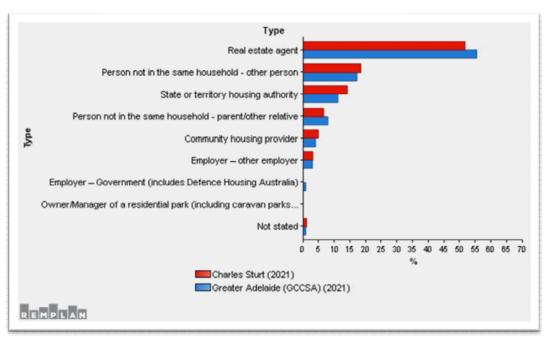


Source: REMPLAN

5.10 Population by Landlord Type

This graph shows the City of Charles Sturt has a higher proportional population in both public housing (mainly SAHA) and personal landlord categories than Greater Adelaide with 14.02% compared to Greater Adelaide 11.02%. In real terms Charles Sturt has 2880 public/social housing dwellings, the fifth highest in SA and Greater Adelaide. Most are older dwellings with 2-3 Bedrooms, unsuitable for future smaller and lone person households. 225 of these dwellings are unoccupied¹.

Source¹: Dwellings Public Housing 30 June 2021 data.sa.gov.au



Source: REMPLAN

6. 2021-2051 - City of Charles Sturt Population and Dwelling Projections – August 2023

Several scenarios are produced based on the different data sources and methodologies used to determine population and dwelling projections to 2051 for the City of Charles Sturt.

Scenario 1 in the table below is considered most plausible based on extrapolated PLUS (Planning and Land Use Services SA Government) high population projections for Adelaide West. Projections in black are sourced from PLUS and projections in blue are extrapolations by City of Charles Sturt staff in the absence of PLUS SA Government figures for specific Local Government Areas (LGAs). An average of 642 dwellings per annum will be required in Charles Sturt over the next 30 years in this scenario, less than the last ten years average of 690 dwellings per annum. (Residential Rateable Property Increases: Finance Section, City of Charles Sturt.

	2021	2041	2051
Adelaide West –	247,123	305,161	392,181 ²
Estimated Residential	(source SA	(58,038 more	(87,020 more people
Population (ERP)	Govt.) ¹	people over 20	over 30 years)
		years; avg 2901.9	
		ppa.	/2.23 = 39,022 more
		(source SA Govt) ¹	dwellings over 30
			years. ³
City of Charles Sturt	121,840	28,612 ⁴ popn.	42,918 ⁵ more people
	people - ABS	increase	(1.174% growth pa)
	2021	(representing	/2.23 =
	(= 0.4930 of	1430.6 ppa)	19,245 dwellings/30
	Adel West		= 642 dwpa to 2051 ⁶ .
	Region ERP)		

City of West Torrens	61,699 people – ABS 2021 (= 0.2496 of Adel West	14,486 increase (724.30 ppa)	21,729 more people
City of Port Ade. Enfield (part)	63,584 (.257 of Adel	14,915 increase (745.75 ppa)	22,373 more people
(part)	West ERP)	(743.73 ppa)	

Scenario 1 - Table 1: Population and Dwelling Projections for City of Charles Sturt 2051

Note: The above projections for Charles Sturt are based on internal apportioning State Government sourced Adelaide West Estimated Residential Population between the City of Charles Sturt, the City of West Torrens and the City of Port Adelaide Enfield for the period of 2021 – 2051, published June 2023. It is anticipated that the State Government will release local government area population projects later in 2023, which will enable a further refinement of the above projections.

Footnotes:

- 1. Plan SA Population Projections for SA and Regions 2021-2051; Table 8 Projected Population Adelaide West Region 2021-2041.
- 2. This figure is an extrapolation of the 2021-2041 increase of 2,901.9 persons per annum for another ten years to 2051 (as no SA Govt figure is provided.)
- 3. This figure is the division of the number of people by the average household size (2.4) in Adelaide West to determine number of dwellings.
- 4. This figure is the portion of Adelaide West population increase of 305,161 to 2041 assigned to City of Charles Sturt
- 5. This figure is an extrapolation of the 2041 projection in 4. above for another 10 years to 2051.
- 6. These figures project the number of dwellings required in the City of Charles Sturt to 2051 and the projected average increase per annum to 2051.

Scenario 2 considers the PointData¹ **general infill** data that projects an average of 333 dwellings per annum over the next 15 years this figure excludes on average 300 per annum coming from strategic infill sites. During the next 5 years general infill will slow due to construction costs, higher interest rates and other factors however Council has significant strategic sites in market that will become more competitive and the ratios of supply between general infill and strategic sites may vary.

Note: 1 PointData Pty Ltd is an independent property analysis consultancy based in Adelaide specializing in property analysis.

Scenario 3 considers rate data from the City of Charles Sturt (CCS) and ERP for City of Charles Sturt from ABS for August 2023. CCS Finance advises some 690 residential properties were created per annum in the 2011-2021 period. This number is reasonably consistent with Scenario 1.

Scenario 4 considers residential planning approval figures and apportions dwelling numbers to these. Quarterly approval figures in the last 12 months were averaged for the number of dwellings per application, producing annual dwelling numbers approved of some 700 dwellings. A small portion of these will not be built. This scenario is also reasonably consistent with Scenario 1.

The precautionary principle to growth has been applied, that is planning for the highest rate so as to ensure forward planning caters for unforeseen circumstances. As such growth of 700 dwellings per annum in Charles Sturt over the next 30 years will be applied. A balanced approach across the region should include consideration of the potential for additional residential growth in Western Adelaide outside of the City of Charles Sturt. Sites

like the recently State acquired Thebarton West End Brewery in the City of West Torrens presents opportunities to contribute to the regional housing target along with Housing SA regeneration sites and uplift around the Port Adelaide Centre in the City of Port Adelaide Enfield.

7. Infrastructure Assessment

7.1 Essential Infrastructure

7.1.1 Water Assets

Council owned water assets are categorised by the following four functions:

- Water Conveyance Primary function of moving stormwater and assisting flood mitigation for homes, businesses and Council streets.
- Water Quality Primary function of removing rubbish, debris and sedimentation from stormwater to clean the water before it reaches rivers, lakes and beaches.
- Water Capture and Re-use Primary function of capturing treated stormwater and facilitating its re-use for irrigation of open spaces and for the third pipe (treated recycled water) network in our new developments.
- Water Amenity Water bodies where the primary function is for public amenity and biodiversity.

An asset management plan and asset strategy has been developed and endorsed for our water assets. The strategy aims to keep all assets at a serviceable condition and where reasonably feasible, assets are upgraded and new assets installed in line with the objectives and actions of endorsed corporate documents.

In order to fulfil the current asset strategy an average spend of approximately \$11m per year on maintenance, renewal and upgrade of Water Assets is required over the next 10-year planning period. This allowance has been reflected in the Long-Term Financial Plan of Council.

Council has also developed and endorsed Stormwater Management Plans (SMPs) for the major stormwater catchments within the Council area in collaboration with neighbouring Councils (where applicable) and the State Government Stormwater Management Authority (SMA). These SMPs have been developed using detailed hydraulic modelling to forecast the likely flood risk now and into the future during different types of rain and storm events. The SMPs include recommendations for infrastructure and non-infrastructure works to ensure that Council is appropriately (refer Appendix 1 Map 1–Stormwater and Flood Management).

State owned water and sewer assets are considered sufficient – with augmentation to accommodate projected growth to 2051. A more detailed analysis will be undertaken on a project by project basis.

7.1.2 Roads And Traffic

Adelaide's dependence on car travel is one of the highest in the country with approximately 85% of daily trips made by motor vehicles. The majority of these trips are made to/from the

Adelaide CBD using the arterial road network. The arterial road network within the City of Charles Sturt has historically performed well but with urban infill continuing in the region the performance of the arterial road network and key intersections is diminishing with many intersections now at or approaching capacity.

Poor performance of the arterial road network can result in drivers choosing to use local streets to move through an area which can detract from residential amenity, liveability and present road safety risks. To control traffic using local streets often requires costly traffic controls which can also be divisive within communities.

The images below taken from the Infrastructure SA 20-Year State Infrastructure Strategy (May 2020) demonstrate the performance of the arterial road network and intersections within metropolitan Adelaide.

Key roads of interest within the City of Charles Sturt area include:

- Torrens Road (noting that recent improvements have been made at Ovingham to remove the rail level crossing)
- Grange Road
- Port Road
- Hanson Road
- Regency Road

Any plans to promote Grange Road, Port Road and Torrens Road as residential growth corridors will need to carefully balance the need for movement along these corridors and this is likely to require investment in road or public transport infrastructure (Refer Map 2 – Travel Time Delay Appendix 1).

Key intersections of interest within the City of Charles Sturt area that are already exceeding desired levels of service include:

- Old Port Road/Frederick Road
- West Lakes Boulevard/Tapleys Hill Road
- Port Road/Cheltenham Parade/West Lakes Boulevard (noting that recent improvements to this intersection were completed in 2020)
- Port Road/Woodville Road
- Grange Road/Holbrooks Road/East Avenue (we understand that works are planned for this intersection as part of the upcoming T2D works)
- David Terrace/Torrens Road/Regency Road
- Port Road/Park Terrace
- Findon Road/Hartley Road/Valetta Road (currently under DIT review)
- Tapleys Hill Road/Valetta Road
- Tapleys Hill Road/Trimmer Parade

Investigations and upgrade to these intersections should be prioritised by the Department of Infrastructure and Transport (DIT) to ensure that growth can occur without resulting in unreasonable travel time delays. The design for these intersection upgrades should also include provision for and prioritise public transport (refer map 3 Appendix 1).

Improving Road Safety is a priority of Council and we are committed to working with the State and Federal Governments to deliver on the identified actions and objectives to ensure that our roads are as safe as possible for our community.

The City of Charles Sturt has been a leader in introducing 40km/h speed limits on local streets with over 60% of local streets now contained in a 40 Area with the rollout to continue over coming years. In addition, Council has endorsed a Road Safety Assessment Procedure and committed to an ongoing traffic control infrastructure program to enable streets to be treated where the design presents a high risk to road user safety.

Local roads in areas subject to substantial general infill development are subject to on-street parking challenges and increased vehicle activity, as well as removal of street trees for wider/double driveways. In the absence of substantial State-led policy changes to address these impacts of infill, Council will consider measures to maintain liveability in these areas by increasing street tree/canopy cover and foot/cycle path quality in accord with asset management plan schedules.

Fortunately the City of Charles Sturt has experienced only a few fatal or casualty crashes on our local roads, however there are sections of the arterial road network which are considered a Black Length or Black Spot.

Sections of Port Road in Hindmarsh, Grange Road (between Crittenden Road and South Road) and Henley Beach Road (near Seaview Road) are considered Black Lengths and should be prioritised for improvements by DIT. If Port Road and Grange Road are to become a focus for further residential growth it will be imperative that these locations receive attention (refer Appendix 1 Map 4 Black Length Black Spot Locations).

7.1.3 Public Transport

The western region of metropolitan Adelaide has seen very little investment in the expansion of public transport services. Major train station upgrades have occurred at Bowden (as part of the Torrens Rail Junction project) and minor upgrades of stations have occurred along the Outer Harbor, Gawler and Grange lines. These upgrades have been welcomed by existing users however they have done little to attract new users to public transport.

A number of schemes have been proposed over the years for new mass transit services within Charles Sturt with the most recent proposal being the Adelink Tram proposal that was included in the recent State Government Infrastructure Transport and Land Use Plan July 2015). This proposal would have delivered expanded tram services along West Lakes Boulevard to service the new developed which is occurring along this corridor and also new tram services into Henley Beach to service the popular Henley Square precinct (see image below). Unfortunately, it appears that there is no commitment to deliver this, or any similar alternative scheme.



The City of Charles Sturt has access to either bus or rail services in many areas, with notable gaps in central western sections, however these services can be slow and infrequent. Access to high quality, faster and frequent public transport services is limited, requiring substantial investment to attract people back to the networks.

Map 5 at Appendix 1 - Public Transport Frequency and Accessibility demonstrates that there are many areas of the City where access to frequent public transport (i.e. running every 15mins or less during peak daytime periods) requires a long walk or would require someone to drive to the nearest service. In these areas the significant majority of people are likely to use a car and it is in many of these areas where the city is also experiencing rapid urban infill which is resulting in high numbers of vehicles parked in streets and impacting the liveability and amenity of the area.

Cycling Infrastructure

Data collected from the Outer Harbor Greenway and River Torrens Linear Park (RTLP) demonstrates that where suitable infrastructure is in place, cycling can play a major role in reducing the reliance on private vehicles. Recent upgrades to infrastructure along the Outer Harbor Greenway has included:

- New underpass at Park Terrace
- Shared use path upgrades through Bowden

- New bridge over Chief St
- Shared use path upgrades between Chief Street and South Road
- New bridge over South Road
- On and off-road cycling upgrades through Croydon/West Croydon and Kilkenny
- Arterial road crossing upgrades at David Terrace and Woodville Road
- On and off-road cycling upgrades through Woodville Park/St Clair/Cheltenham

These infrastructure upgrades by Council and the State Government resulted in exponential growth in cycling activity along the corridor over the past 5 years demonstrating the impact that good quality infrastructure can have on cycling activity, often at a fraction of the cost of road investment.

Further investment in cycling infrastructure is required in partnership with the State Government to provide a real alternative option to the private vehicle. In addition to the continued deliver and completion of the CCS Strategic Cycling Network and local network upgrades the following major cycling initiatives should be explored to support the likely new and existing residential growth areas:

- DIT to commit to dedicated and separated on road bike network through centre of Council area
- DIT to commit to separated bike lanes on Trimmer Parade from Military Road to Findon Road
- DIT to commit to separated bike lanes on Crittenden Road to Grange Road.

7.1.4 Essential Utilities

Based on feedback from essential services providers of SAPN and SA Water during the 2011 and 2013 growth forecast reports and during the Code Amendment investigations for Kilkenny, Bowden, Findon, West Lakes, Kidman Park and, Albert Park minor augmentation for Water, Waste Water, Electricity and Gas will be required over time with costs borne by developers. General infill is able to be accommodated through augmentation charges borne by the subdivision. Further confirmation will be sought in partnership with PLUS as part of the CCS investigations and investigations as part of the GARP for Western Adelaide Region.

7.1.5 Green Infrastructure

Climate Change

The ongoing commitment in responding to and managing our climate risks is critical in our function as a Council and a State. Climate change is a high strategic risk and needs to be managed to ensure we lead our community towards a sustainable and climate ready future. The way in which our neighbourhoods, both in their built form and living landscapes; can provide refuge from extreme weather, green and biodiverse corridors, and ensure our preparedness and ongoing ability to live within a well-developed urban structure.

Greening within street and road corridors and ensuring all new residential development includes trees and open spaces, will significantly reduce the long-term impacts of heat within our urban environment. Appropriate species selection for our changing climate, space and opportunities for greening will also provide for improved biodiversity corridors and the associated wellbeing of our increasing residential population.

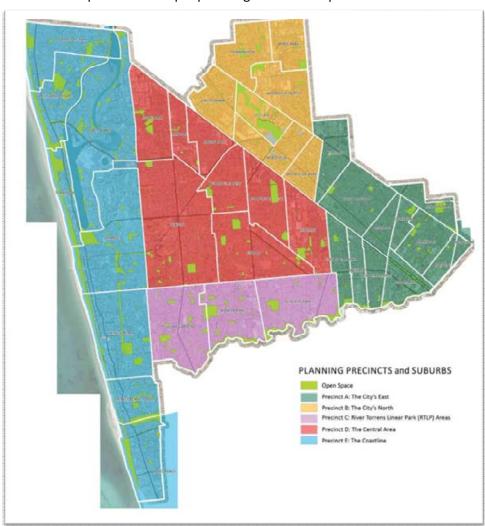
Ensuring all new developments incorporate environmentally sustainable development techniques to a standard appropriate to achieving and mitigating the impacts of climate change, will provide communities with housing that is responsive and minimises the impacts of climate change. Simple techniques such as thermal efficiency through glazing, dwelling orientation, connections to electricity and moving off gas, efficient building materials will future proof our communities now and into the future.

The reduction of emissions resulting from environmentally sustainable built form will also contribute to State government targets of Net Zero by 2050.

Open Space Provision

Appendix 1 Map 7 - Distance to Reserve- Regional, District Local and Neighbourhood shows the coverage of neighbourhood reserve we have across the city within 300 metres of residential properties and district and regional reserves (often sporting) within 400 metres of residential properties. This is an industry benchmark. Map overlay 7 shows good coverage across the city but doesn't tell the whole story.

The Map below shows the Five Open Space Planning precincts used as part of the 2015-2025 Open Space Strategy. An assessment of these areas considered the amount of open space in hectares compared to 1000 people living within the 5 precincts.



Source: City of Charles Sturt Open Space Strategy 2025

The following Table and Precinct Character Considerations is taken from the current Open Space Strategy 2015-2025

Open Space in the Planning Precincts

The provision of open space in each Planning Precinct is summarised in the chart below and further details are included in the Background Report.

Planning Precinct	Open Space Provision *	Open Space Types	Hierarchy Focus
Precinct A	46.34 ha (3.3ha/1,000)	A mix of recreation parks, landscape parks, linear open space and fair amount of streetscapes	Quite a lot of local and neighbourhood open space, but also some district level
Precinct B	49.04ha (3.59ha/1,000)	A number of sportsgrounds and recreation parks as well as some linear open space and a fair amount of streetscapes	A mix of district, neighbourhood and local open spaces
Precinct C	63.89ha (4.62ha/1,000)	Considerable linear open space as well as a number of recreation parks and landscape parks, two sportsgrounds and some streetscapes	Regional open space through the RTLP, otherwise mainly neighbourhood level and some district and local
Precinct D	54.59ha (1.67ha/1,000)	A number of sportsgrounds and recreation parks, as well as landscape parks and streetscapes	A lot of local open space, and some neighbourhood, district and regiona open spaces
Precinct E	220.61ha (7.21ha/1000)	Considerable waterfront open space and natural areas, as well as a number of recreation parks, landscape parks, sportsgrounds and streetscapes	A lot of regional and district open space due to the coastline and West Lakes, as well as a number of neighbourhood and local open spaces
TOTAL	434.47ha (4.14ha/1,000)	A diversity of open space types is provided across the City	Higher level open space generally links to the coastline, RTLP and Wes Lakes, as well as sportsgrounds and larger parks

^{*}The hectares per 1,000 people figures are based on current open space provision including streetscapes and 2011

Precinct Character Considerations

Whilst the Open Space Strategy 2025 aims to achieve equity, there are differences between the Planning Precincts that will justify a different focus. For example:

- Precinct A will have higher densities than the other Precincts and as such parks and reserves in this area could justify being a higher standard and the inner city character of the area could require a greater focus on creating open space connections and place making.
- Precinct B incorporates new open spaces linked to urban development around St Clair as well as some lower income areas that justify a good provision of well-developed and maintained open spaces.
- Precinct C incorporates the River Torrens Linear Park (RTLP) which has State value and justifies enhancements and initiatives relating to biodiversity. The potential for biodiversity corridors and connections beyond the RTLP could also be considered.
- Precinct D has considerably less open space than the other Precincts with only 1.67 hectares per 1,000 people in 2011 (including streetscapes). As such, opportunities for increasing the quality, function, usability and provision of open space should be considered, particularly in suburbs that have a low provision.
- Precinct E incorporates open space that has 'high destination value' due to its link to the coastline and West Lakes. As this open space is likely to benefit people from across and beyond the City, a greater focus on maintaining and enhancing open space in Precinct E is therefore likely to be justified.

Source: City of Charles Sturt Open Space Strategy 2025

Precinct D has the lowest amount of open space per 1000 persons when compared to the other 4 precincts. Precinct D with 1.67 hectares of Open Space with the next lowest being Precinct A which has benefited from additional open space as part of new housing growth at Bowden.

Further to this Precinct D is also experiencing the most general infill activity, the worst localised flooding, the largest impact of climate change due to heat island and the poorest transport options.

In areas that are under serviced by public open space, investigations into shared use agreements with public and private education providers could be investigated to provide access to ovals and green spaces outside of school hours.

Street Tree Planting Program

As one response to climate change Council undertook a heat island mapping exercise and in response developed a more comprehensive and concerted street tree planting program. Appendix 1 Map 8 Street Tree Planting Program to 2025 shows a good proportion of activity is within the heat island area and the precinct most undergoing general infill.

7.1.6 Social and economic infrastructure

Community Facilities

Social infrastructure creates opportunities for community connections and community resilience. Much research points to the ability of communities to manage the impacts of local disaster and climate change by working together and feeling connected. Council facilities, churches, schools, and centres are the cornerstone of the infrastructure that bring communities together. The City of Charles Sturt has a wealth of such assets as borne out by **Appendix 1 Map 9 Social Infrastructure**. Going forward ensuring these community development assets are maximised through a coordinated and collaborative approach will be important.

Recreational Facilities

Sport and recreational facilities are very much at the centre of local community life. The City of Charles Sturt is rich with such assets but also many are bursting at the seams. A much-encouraged increase in women's participation as borne in both soccer and AFL places increased stress on Council playing fields. Access to more playing fields will be fundamental as the city grows. This can in part be achieved through the State government considering open space, ovals and reserves as important as infill housing. 12.5 % open space in strategic sites is often inadequate to create ovals, something developers are not as motivated to provide by compared to passive open space adjacent medium density dwellings. Government continues to look to sell land such a SA Water Land and SASI at Kidman Park before first fully assessing the need for formal recreation. State schools make decisions about local community access independent of Government direction which substantially limits community access in part due to the need for individual site by site negotiations and this needs to be addressed more broadly. All of these matters will need to be vigorously

pursued and Council will need to consider acquiring land in areas where it remains affordable for expanded sports facilities if projected growth and current trends continue.

Childhood Education.

Childcare, preschools and schools play a fundamental role in the social cohesion of local communities. Partnerships with local government can facility access to important open space, meeting areas and recreation assets outside of schools primary usage. Appendix 1 Map 10 Educational assets shows their distribution across the City.

Ideally, primary schools and child-care centres should be within 5 to 10 minutes walking distance of nearly all dwellings, encouraging safe, healthy, comfortable walks for parents and children with opportunities for social interaction.

7.1.7 Activity Centres - The Neighbourhood Heart

Social contact is the essence of life and local centres/coffee shops/meeting venues are often the 'place' where this contact occurs safely and enjoyably. Centres are also critical to a walkable community, so everyday staples — milk, bread etc — are within walking distance, encouraging healthier, less car dependent communities. Map 11 at Appendix is derived from a 2023 Local Activity Centre Revitalisation strategy that identifies key local centres that can be improved to act as local destinations for neighbourhoods recognising the importance, they play in community life.

7.1.8 Economic Development and Employment Precincts

Council's *Urban Employment Land Review 2019* classified the remaining 17 precincts into Prime or Secondary Employment areas. Prime are considered strategically important and capable of continuing to attract commercial industrial investment. Council has always recognised the importance of employment land and the significant contribution that it makes to the local economy and providing employment opportunities for the community. This supply study helps guide council when approached by landowners who may be seeking a change in land use through a Code Amendment. Map 12 Appendix 1 shows their distribution across the city. Employment Areas are also often under pressure when located in inner city areas or near established residential areas; careful analysis is required to determine what the highest and best use of these lands are, taking into account social, environmental and economic considerations now and into the future.

The City of Charles Sturt Economic Development Strategy (EDS) 2022-2026, further recognises the strategic importance of employment lands and their significant contribution to the local economy. Defence and Advanced Manufacturing is identified as one of the key growth sectors along with Urban Development, Health and Tourism. Protecting our employment lands and encouraging commercial and industrial development is critical for future growth. These will drive investment and enable knowledge -based business service industries, creating local jobs and a more dynamic local economy.

The ongoing protection and regeneration of employment lands is important in providing the community with access to local jobs and services without the need to travel long distances. The protection of employment lands needs to be balanced with supporting residential growth in strategic locations to ensure that there is a diversity of affordable housing options and to assist local business to be able to employ local people with a range of skills.

The EDS includes a number of key actions to support the regeneration of Employment Lands including:

- Creation of investment attraction collateral for Employment Land precincts
- Promotion of business growth and innovation grants oriented towards innovation, diversity and transformation.
- Supporting the uptake of technology and building supply chain capability
- Encouraging and facilitating business to business connections through a calendar of events and workshops
- Promoting existing GigCity Precincts (Hendon and Welland) to grow and attract businesses and investigation of opportunities for new ones.

In the City of Charles Sturt Employment lands occupy 438.8 hectares, 8.4% of the total Charles Sturt Council area, 5 214 hectares.

- 2 432 businesses are located in the Employment Lands (Remplan ABR, 2023)
- Over 54 % of economic output is contributed from businesses in the employment lands areas \$7.43 b (54.1%). Council area \$13.73 b (Remplan)
- 47.8% of all jobs in Charles Sturt are located in the employment lands 22,722 (total jobs, 47,543) Remplan, 2022.

Prime Employment Areas

		 ,	
_			
2			

Precinct	Royal Park (1)	Athol Park (3)	Woodville North (4)	Woodville (7)	Hendon South (9)	Beverley (10)	West Croydon / Kilkenny <u>Sth</u> (14)	Hindmarsh (16)
Area (ha)	48.4	54.7	62.8	29.1	30	74.6	23.5	25.5
No of parcels	162	196	126	35	56	378	60	207
Av parcel size (m²)	2987	2791	4984	8314	5357	1883	3917	1231
Av parcels per ha	3.3	3.6	2	1.2	1.8	5.1	2.6	8.1
Vacancy rate 1	3.7 %	NA	NA	5.7 %	11 %	7.2 %	0	2.4 %
Jobs per ha 2	10.6	11.1	7.5	14.7	15.5	20.9	7.4 *	60.7

Secondary Employment Areas

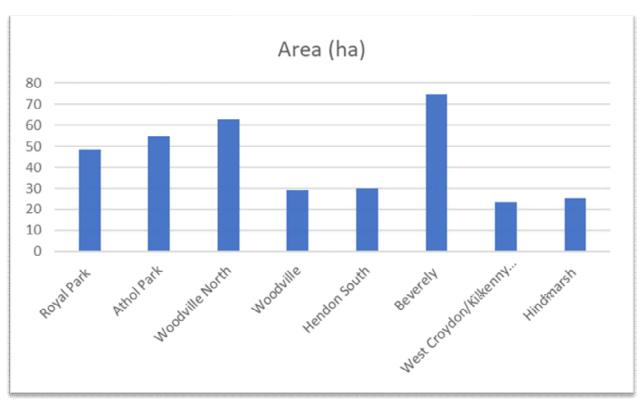
Precinct	Tapleys Hill Rd (2)	Kilkenny North (5)	Albert Park (6)	Hendon North (8)	Welland (11)	East Ave, Beverley (12)	Grange Rd, Beverley (13)	South Rd / Port Rd (15)	Torrens Road (17)
Area (ha)	0.5	24.3	20.2	3	20.5	3.8	16.7	14.8	1.6
No of parcels	8	93	89	34	163	12	115	121	19
Av parcel size (m²)	625	2612	2269	882	1258	3146	1650	1223	842
Av parcels per ha	16	3.8	4.4	11.3	8	3.2	6.9	10.1	11.9
Vacancy rate 1	0	NA	NA	2.9 %	3.1 %	NA	0.9 %	4.1%	0
Jobs per ha 2	15.5 *	32.1	9*	15.5 *	29	20.9	20.9	29.5 *	9.8 *

¹ Charles Sturt Urban Employment Land Review 2019 28 Remolan - Destination Zones data 2023

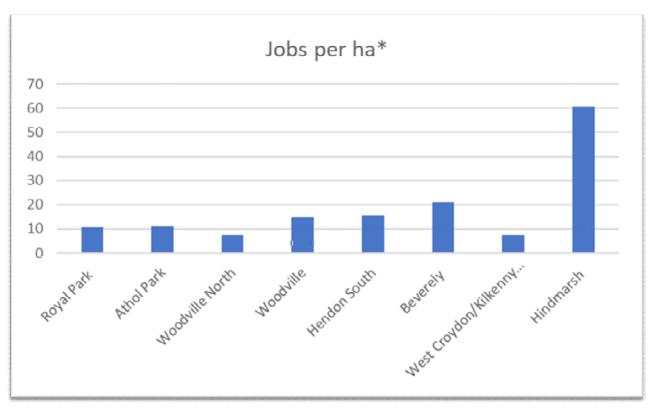
NA - Not available

Source: REMPLAN – Destination Zones data 2023

^{*}note this includes a large portion of non-employment area in the broader Destination Zone, Remplan, 2023.



Source: Charles Sturt Urban Employment review, 2019



Source: Remplan Destination Zones Data, 2023

The above table and graphs highlight the following observations for the City's Prime Employment Areas:

- The City of Charles Sturt has considerable stock of Urban Employment Zoned land
- In physical size, the largest employment precincts in the City include Beverley,
 Woodville North, Athol Park and Royal Park, which reflect their current status as
 Prime Employment Areas which provides opportunities for future development
- The Beverley precinct contains the largest number of parcels reflective of the number of smaller residential sized allotments located in the precinct
- The largest average parcel sizes are in Woodville North, Hendon and Woodville
- The Precincts with the highest number of jobs per hectare are in Hindmarsh (60.7) and Beverley (20.9).

8. Existing and Future Potential Residential Growth Opportunities

On average 690 dwellings per year were built within the City of Charles Sturt from 2017-2022. On average 2/3rds of this growth comes from general infill with 1 third being developed from strategic sites.

Council projected growth population as discussed under chapter 6 directly correlate to new housing being built. If housing supply is slowed so will Council's projected population growth.

Council currently has zoned land capable of providing a further 7,348 general infill sites (Appendix 1 Map 13 - General Infill) and 5392 new dwellings in rezoned strategic sites (Appendix 1 Map 14 Strategic Infill).

Outside of general infill and strategic sites a further 1739 dwellings anticipated to be developed over the next 15 years without any policy changes. These additional dwellings will be constructed in centres and corridor providing a total housing supply for the next 20 years. Appendix 1 Map 15 Retail and Commercial zones show Councils retail and commercial land uses in centres and corridors.

Section 13.1 highlights dwellings that may derived from Centres and Section 14.1 highlights dwellings that can be derived from corridors.

Over this 15-to-20-year period further general infill sites will replenish the 7,348 as they a developed.

Likely general infill growth for Charles Sturt is based on State Planning and Land Use Services data. In recent months an increase in interest rates, construction and land costs has slowed demand within CCS. This might be a temporary slowing and could be offset through demand drivers such as government funding including shared equity schemes , first home buyers grants and institutional funding for build to rent options. Further to this master planned developments can deliver diversity of housing meeting the needs of smaller households.

General infill /location	Estimated dwelling yield 2021-
West lakes	2036
West Lakes	756
Royal Park /Hendon/Albert Park	418
Woodville Cheltenham	1002
Seston/Grange	723
Beverley	1116
Hindmarsh/Brompton	768
Flinders Park	1725
Henley Beach	687
West Beach	153
Sub Total	7348
Strategic Infill	Future anticipated yield. May
	2023-
Bowden	1563
Kilkenny	300
St Clair (racecourse site)	200
Woodville	185
WEST	247
Woodville west	64
Kidman Park (former Metcash site)	300
Trident Site St Clair	140
Bowden Brompton	1409
Albert Park	250
Seaton	245
SA Water (CA in progress/subject to	489
approval by Council and the Minister for	
Planning)	
Sub total	5392
Centres	1162
Corridors	577
Total	14,479

Table 2 – Total housing supply

Based on the Projected Growth of 700 dwellings per annum Council has housing supply for the next years 20 years plus a further approximately 2,400 of general infill dwellings as capital to site value ratios converge .

Beyond this period, general infill will still play a role as will future strategic infill sites (refer Summary of Growth Opportunities out to 2057).

8.1 General infill

State Government, Planning and Land Use Service Department (PLUS) describes General Infill as development that:

- Occurs on residentially zoned land parcels within established urban areas of Greater Adelaide
- Typically involves the demolition of older dwellings although in some areas existing dwellings are retained and another dwelling is constructed (re subdivision).

PLUS provide a more detailed analysis on the availability and readiness of General infill development opportunities:

DEVELOPMENT STATUS	DEFINITION
Short Term	Land satisfies relevant zone requirements for land division and has a CV/SV Ratio of less than or equal to 1.3.
Medium Term	Land satisfies relevant zone requirements for land division and has a CV/SV Ratio greater than 1.3 and less than or equal to 1.8.
Long Term	Land satisfies relevant zone requirements for land division and has a CV/SV Ratio of greater than 1.8.

The City of Charles Sturt has 22,300 allotments capable of being subdivided. Many of those will not be subdivided for a number of reasons. Those include the ageing and character of the home, landowners preference for larger allotment or capital improvements made over time to the existing residence making demolition unviable. There are also a number of commercial realities including owners' appetite for risk and ever increasing subdivision and building costs.

In applying PLUS's capital to site value ratios of less than or equal to 1.3 and 1.8 Council has 7,348 allotments that are likely to be subdivided over the next 15 years taking into account several commercial factors. This number is not static but a point in time. As assets depreciate new houses will fall within the 1.3 capital to site ratio and be vulnerable to subdivision (refer to Map 13 General Infill).

Issues and Opportunities

General infill, whilst assisting in renewing housing, providing housing diversity and generating some revenue for Charles Sturt residents through subdivision is not well received by those surrounding the site.

General Infill does not contribute adequately to resolving the problems it generates. The problems include on street parking and road network congestion, loss of tree canopy, increase heat island effect, increase stormwater runoff, loss of streetscape and neighbourhood character and lack of open space.

The Planning Commission recently received a report on the impacts of general infill and whether minor amendments to the Planning and Design Code have had a positive impact on these issues. That report, plus the report from the Expert Panel reviewing the Planning and

Design Code have not yet been publicly released but should be reviewed within the context of any possible further reform.

Investment in Infrastructure

<u>An integrated state government rapid transport service</u> needs to be implemented in areas of general infill growth that reduces reliance on private car use.

An Expansion of existing neighbourhood parks in suburbs experience significant infill where population to open space benchmark ratios are not being met. Funding acquisition is difficult. A greater contribution should be derived from land divisions in these areas. Current contribution is less than 20% of true cost of the land equivalent. Compulsory acquisition powers for the purposes of public open space needs to be considered.

<u>Streetscape enhancement program</u> –accelerated investment in street quality to improve tree canopy, reduce traffic volumes, enhance on street car parking, reduce road widths in key collector streets, increase road closures and developed pocket parks. This requires extensive consultation and a clear vision for what streetscape topology will be developed where.

Planning and Design Code Reform

There are a number of potential Code policy reforms and legislative amendments which should be considered by the Government to improve the amenity of areas that are experiencing general infill. Such issues include but are not limited to:

Carparking and storage for dwellings – Carparking size in double garages need to be increased to allow for people to park and exit their vehicles within the garage space, reducing the impact of private vehicles parking on public streets.

Off-street car parking provisions - Consideration for off street car parking ratios to ensure two spaces are provided on-site for dwellings, regardless of the number of bedrooms.

Urban Tree Canopy Off-set Scheme – Specific Zones should not have the option to pay out in lieu of planting a tree where there are significant benefits in ensuring trees are planted.

Tree canopy – Amendments to policy to ensure sufficient setback to allow for a potential tree in the rear yard.

Public Realm Tree Planting – Improve criteria for greater consideration being given and demonstrated for alternative design solutions and the retention of street trees.

Private Open space – The provision of private open space based on <301m2 = 24m2 is not considered sufficient given 300m2 is the maximum site area for most dwelling types in Council's General Neighbourhood Zone (the most common residential type of zone in the city). Amendments should be considered on policy based on a sliding scale depending on the size of the site.

Legislative considerations

Regulated trees – The broadening of the legislative definition for Regulated and Significant trees can capture a greater number of trees in a locality. Future tree damaging activities

triggering a development application are given the appropriate scrutiny before such actions are undertaken. This provides greater opportunity to maintain and improve on urban tree canopy in the metropolitan area.

Public open space contribution – The current legislative provision of 12.5% is not considered sufficient to address future higher density residential environments and should be increased. The opportunity exists for Council to adopt a policy of open space beyond 12.5% for medium density strategic sites where council leads the Code Amendment process.

The open space contribution per allotment in General Infill is also inadequate at just \$7,800 per allotment given the cost of land per m2 in these location that council must pay to expand existing reserves .

Code Amendment requirements

Council is in the process of undertaking a Character Area Code Amendment for the City of Charles Sturt. A Residential Streetscape Character Analysis was undertaken by Council in 2013 as a precursor to preparing a Development Plan Amendment (DPA) now known as a Code Amendment. The Study identified some 17 areas within a Streetscape Policy Area. The draft policies sought to encourage street fronting infill development which was respectful of the prevailing character but did not intend to introduce demolition controls. The Code contains a Character Area Overlay which provides Council with an opportunity to revisit the 2013 findings and undertake a Character Area Code Amendment in the short term.

In the short to medium term a broader Residential Strategy is warranted for future consideration within the areas of Charles Sturt that are undergoing significant general infill. To inform these future investigations a review of the Government's directions in its future Greater Adelaide Regional Plan is required to understand future growth considerations as well as identifying general infill issues which have been borne out of the Code since its implementation.

8.1.1 Integrated Precinct Planning (Your Neighbourhood Plan)

Given the scale of the area most adversely affected by General infill and the issues and challenges, a significant urban planning and infrastructure master plan needs to be developed in the central part of CCS. The proposed Your Neighbourhood Plan (As Per Precinct Map 16 at Appendix 1) needs to galvanise community and political support necessary for the changes to be implemented. Scope of the Plan is to address key infrastructure issues and required policy reform to offset the negative impacts of unmitigated general infill.

The focus area has a significant amount of infill growth, is most impacted by heat island, has the poorest access to rapid public transport, has the highest ratio of people per 1 hectare of public open space and is in one of Councils worst affected flood areas.

These impacts are most acute with the central part of the City as can be best understand by reviewing the maps in Appendix.

Recommendation

Seek Federal Government support for a \$75,000 Commonwealth Grant from the Urban Precincts and Partnerships Program to co-fund (\$75,000 from Council) a master plan of the City's central suburbs most affected by general infill (refer Appendix 1 Map 16).

8.2 Strategic Infill

8.2.1 Current Strategic Infill Site Assessment

Consistent with the 2011 City of Charles Sturt Residential Growth and Character Study and subsequent endorsed Section 30 reviews under previous legislation Council has progressively supported or led 12 DPA's/Code Amendments that have assisted in the delivery of master planned communities with an estimated yield of 8,848 dwellings. As at May 2023, 2,896 dwellings have been generated with a further 5,085 new dwellings anticipated to be generated over the coming 15 years.

Supply Location – Known Strategic Infill Sites in CCS	Originally assumed dwelling yields (du)	Current yield (constructed/under construction) (May 2023) approx.	Anticipated dwelling yield remaining (approx.)	Likelihood of completion by 2036 yield
Bowden (RSA and MAB) (commenced approx. 2013)	2400	837	1563	Yes
Kilkenny (not commenced)	300	0	300	Yes
St. Clair (AV Jennings) (commenced approx. 2010)	1310	1100	200	Yes
WEST (C&G) (commenced approx. 2014)	1300	503	247	Yes
Woodville West (commenced approx. 2011)	429	365	64	Yes
Trident Site (not commenced)	140	0	140	Unknown
Kidman Park (former Metcash site) (not commenced)	300	0	300	Yes
Woodville Station (PEET) (commenced 2023)	185	0	185	Yes
Bowden – Brompton (commenced 2023)	1500	91	1409	50%
West Lakes (SA Water) (not commenced) (subject to Code Amendment approval)	489	0	489	Yes
Albert Park (not commenced)	250	0	250	Unknown
Seaton (not commenced)	245	0	245	Unknown
TOTAL (du)	8848	2896	5392	

Table 3 – Known Strategic Infill Sites in Charles Sturt

Key learnings from these previous rezoning processes include:

- Land that is currently not generating a revenue and has dilapidated assets and in single
 ownership are the essential ingredients to drive owners' interest in a change in use and
 private sector investment in housing.
- Despite these being master planned sites with 12.5% open space the surrounding community are highly sensitive to any medium to high density housing such as apartments and perceived traffic impacts.
- Where ownership is fragmented and or generating a return for the landowner (Albert Park, Seaton, Bowden-Brompton, Port Road Hindmarsh) very little of the land rezoned

- has progressed to land division and construction stage highlighting that policy uplift alone is not enough to generate market activity.
- Few if any sites now exist that are of scale, in single ownership and not providing local employment.

8.2.2 Future Strategic Infill site uplift

<u>Seaton</u>

A significant portion of Seaton is under state South Australian Housing Authority ownership. Successive State Governments considered redevelopment options in the but have not progressed to date. Managing existing tenants to ensure continuity of housing in the same or nearby area is critical.

Council administration has long sought a master plan over the whole of site knowing that general infill via a block or two at a time delivers the worst possible outcome. It would be better to support higher density that is included in a complete master plan for the site than it would be to have piecemeal development that does not address local amenity issues of traffic, street tree canopy, public transport, streetscape design, social infrastructure, local shop revitalisation and public open space. Council needs to continue to proactively demand a master planned quality renewal project with less imposed (financial constraints to ensure development in this part of the city leaves a positive legacy.

Visy Glass Port Road

The parcel is in single ownership, approximately 13 hectares in size and adjacent rapid transit with excellent local amenity. The cost for Visy to relocate is prohibitive at present and may remain so however it presents an opportunity as a strategic site for potential residential medium density living with complimentary mixed-use opportunities and the State should look towards incentives for relocation at some point in the future. Given its size adjacent to a primary school, train station, Greenway, Port Road and Welland Shopping Centre as many as 1,300 dwellings could potentially be generated from this site subject to further detailed investigations involving matters such as but not limited to remediation, traffic and access.

Recommendations

- a) Continue to discuss with Visy their long-term strategic planning for their site.
- b) Include the Prime Employment Precinct as part of review of Employment Lands to identify the level of strategic importance and highest and best use.

Entertainment Centre

This 5.5-hectare site is owned by the State Government in an area identified by the Planning Commission as having potential to generate a Master Planned urban renewal site of some 800 dwellings. Should the Government be prepared to consider making the site available for redevelopment a broader study of the Hindmarsh area in this location becomes necessary.

Constraints and Opportunities

The primary constraint would appear to be the cost to relocate the Entertainment Centre. Recent investment in the Hindmarsh Stadium also suggests its location is secured long term however, if the broader Hindmarsh Triangle is to be considered for a Master Planning exercise, then the future of these two large sites within the precinct must also be fully considered beyond just the immediate asset replacement consideration.

Combined with the Hindmarsh Stadium and Entertainment Centre a precinct master plan should be developed in partnership with the State Government to ensure constraints and opportunities are suitably addressed creating a clear vision for the long-term future of this part of our city. (medium-term priority).

Hindmarsh Triangle

This area is in multiple ownership generating the most jobs per hectare of any employment precinct within Charles Sturt (refer to Heading Infrastructure Assessment – Sub-Heading Economic Development and Employment Precincts). Given its location to major transport options, CBD employment, Port Road District Centre, River Torrens Linear Park and, Parklands amenity, etc makes it a site worthy of consideration as a mixed use employment whilst also encouraging residential investment.

Constraints and Opportunities

The primary constraint relates to single ownership size of many of the sites. The lack of open space within the triangle and the potential loss of employment as the area gentrifies. Opportunities to generate a new local park would need to be pursued and funding for street improvements (as heavy vehicles decline) present opportunities for improved local amenity supporting the policy changes and private sector investment. A new funding model and legislative regime beyond those that currently exist would need to be introduced to ensure the outcomes are delivered equitably. Both Hindmarsh Stadium and the Entertainment Centre need to be considered. Given the recent investment in Hindmarsh Stadium, potential future development south of the River Torrens at the Brewery site, development at Bowden (MAB site) and the rezoned land at Bowden Brompton (Detmolds etc) all representing a significant loos of employment zoned lands in the vicinity, careful consideration is necessary. This is a longer-term proposition.

Recommendation

A review of the City of Charles Sturt Employment Lands to ascertain the long-term demand for Council's current employment precincts and to assist in informing future Code Amendment considerations.

8.3 Retail Centres

8.3.1 Current Centres assessment

The table below is a summary of existing centres under **current Zone policy** for potential dwelling yield (assuming gross figure with medium density (70du/ha) and only 20% of each site developed for potential dwellings given the Zones primary objective is for commercial/retails land uses).

Summary Table

Centre location	Approximate area (ha)	Current Zone	Approximate du (gross) based on medium density (70du/ha) assuming 20% of the site
Hindmarsh	23ha	Suburban Activity Centre Zone	325du
Hindmarsh	2ha	Suburban Business Zone	28du
Welland	3ha	Suburban Business Zone	45du
Kilkenny	12ha	Urban Activity Centre Zone	172du
Kilkenny	2ha	Suburban Business Zone	32du
Kilkenny	2ha	Suburban Activity Centre Zone	32du
Fulham Gardens	5ha	Suburban Activity Centre Zone	73du
Findon	5ha	Suburban Activity Centre Zone	72du
West Lakes	24ha	Urban Activity Centre Zone	337du
		Total	1,116du

Table 4: Summary of existing centres and potential yield

Council has several existing Centre type Zones which under the existing zone policy provides an opportunity for future dwelling growth. The existing zone policy supports generally medium density dwelling outcomes (if and when there is market demand) provided future residential development does not prejudice the operation of existing non-residential development and the long-term provision of services and facilities for wider community benefit. The dwelling yields above are a conservative figure based on a medium density scenario (maximum 70 dwellings per hectare) and assumes only 20 percent of these sites could be developed for future housing.

Constraints and Opportunities

The existing Centre Zones highlighted above provide an opportunity for future residential growth given their proximity to established services, transport network, public transport. The need for additional retail and commercial land use in and around centres to service the population growth will also need to be considered as part of the investigations.

While the existing Centre Zones provide an opportunity for future growth in Charles Sturt further detailed investigations would be required on a case-by-case basis on matters including but not limited to:

- Land ownership
- Location of public open space
- Location of EPA licensed areas
- Interface with non-residential land uses and land use mix
- Interface with any heritage places (State heritage, Local Heritage and areas within a Historic Area Overlay
- Traffic management
- Environmental assessment; and
- Stormwater management.

8.3.2 Future Potential Centres Uplift (refer Appendix 1 Map 18 for these locations)

Retail has continued to evolve and change and both sites are large and well located. Improved public transport to the CBD and to other centres would need to form part of any master planning of the sites but as single owner large sites there are opportunities to achieve some improved amenity to support residential living,

The Port Road Suburban Activity Centre at Hindmarsh also presents an opportunity to consider policy changes. Whilst on the northeastern side of the road some policy amendments were made at the time of the Bowden DPA in 2013 investment and redevelopment has not followed. A master planning process with the expressed objective of a Code Amendment may assist to shape this Activity Centre and position it well to complement the broader Hindmarsh triangle planning envisioned in the longer term.

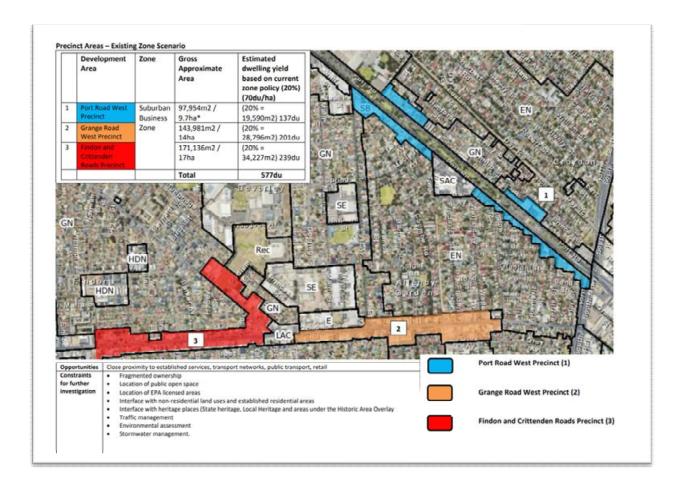
8.4 Transit Corridors

8.4.1 Current Corridors assessment

The information below is a summary of potential dwelling yield in existing inner west corridors based on current Zone policy. The locations are located along a portion of Grange Road and Port Road and located in the Suburban Business Zone. The Zone also occurs along other key arterial networks in Charles Sturt including Tapleys Hill Road, South Road, David Terrace, Torrens Road and Findon Road.

The assumption includes a gross figure with medium density (70du/ha) and only 20% of each site developed for potential dwellings given the Zones primary objective is for commercial/retails uses.

The Suburban Business Zone policy supports generally medium density dwelling outcomes that does not prejudice the operation of non-residential activity within the zone (dependant on market demand). The Zone supports generally low rise built form which is defined by the Planning and Design Code as up to 2 building levels.



Constraints and Opportunities

The location of these corridor zone (Suburban Business Zone) provides an opportunity for future growth given their proximity to established services, transport network, public transport.

Further detailed investigations would be required on a case by case basis on matter including but not limited to:

- Land ownership
- Location of public open space
- Location of EPA licensed areas
- Interface with non-residential land uses and established residential land uses
- Interface with any heritage places (State heritage, Local heritage and areas within a Historic Area Overlay
- Traffic management
- Environmental assessment; and
- Stormwater management.

8.4.2 Future Potential Corridor Uplift

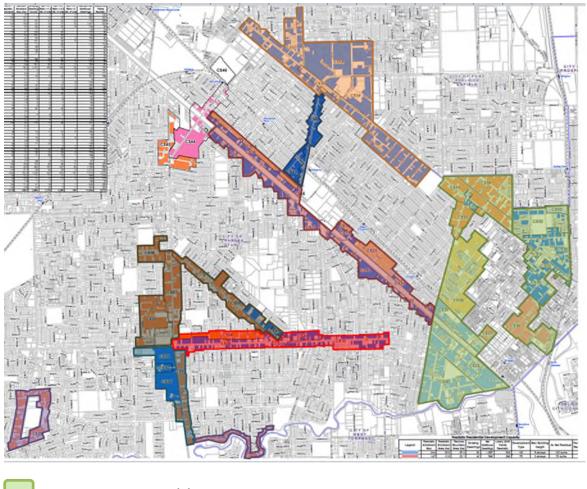
Council previously prepared a residential yields analysis in 2013, which was identified by the Charles Sturt Strategic Directions Report 2014. The analysis's scope included:

- Spatial analysis of residential dwelling targets in 30 Year Plan for Greater Adelaide.
- Identify precincts that will accommodate medium to high density development in Transit Oriented Developments, nodes and transit corridors (20 percent of the Council area). Development potential for the remaining area (80 percent) will be consolidated.
- Consider infrastructure and open space provision

The analysis identified a number of potential areas including along corridors within the inner west of the City and based an assumption that only 50 percent of the total capacity would be developed over a 30-year period. The analysis also assumed a high residential scenario for the areas identified beyond the existing zone policy. The analysis concluded that the areas identified had the potential for 5501 dwellings: An extract of the analysis is detailed below:

Precinct	Likely 2038 Dwelling Yields Realistic	%
Inner West Precinct (1)	1973	35.9
Torrens Road West Precinct (2)	1381	25.1
Port Road West Precinct (3)	692	12.6
Grange Road West Precinct (4)	402	7.3
Findon and Crittenden Roads Precinct (5)	378	6.9
Findon Road South Precinct (6)	372	6.8
David Terrace and Kilkenny Road Precinct (7)	173	3.1
Fulham Gardens and Flinders Park Precinct (8)	130	2.3
Total	5501	100

Table 5: Breakdown of Likely 2038 Dwellings Yields – Charles Sturt Council – Residential Yields Analysis 2013



Inner West Precinct (1)

Torrens Road West Precinct (2)

Port Road West Precinct (3)

Grange Road West Precinct (4)

Findon and Crittenden Roads Precinct (5)

Findon Road South Precinct (6)

David Terrace and Kilkenny Road Precinct (7)

Fulham Gardens and Flinders Park Precinct (8)

The 2013 Residential Yields Analysis showed there was opportunity for potential growth in these locations if and when there was demand and was contingent on future Code Amendment investigations. These areas were also ranked based on assessment criteria with the findings still relevant and used for calculating likely yields for Corridors in the below table.

Experience since 2013, where policy was introduced elsewhere such as Churchill Road and Henley Beach Road, shows that little development has occurred and where that has been developed has not necessarily been well received by the surrounding community.

To that end and considering significant supply in the pipeline and future strategic sites and Centres providing larger parcels under single ownership a more nuanced and limited scope for corridor growth is proposed as a potential future consideration longer-term. The following table identifies future opportunities for investigation and master planning overlayed by priorities based on earlier analysis.

9. Summary of future Residential Growth Opportunities

(High Priority 0-5 years; Medium Priority 5 to 10 years; Low Priority 10 years and beyond)

	General infill		Ongoing and likely to provide	
			future opportunities out to	
			approximately 2057	
Мар	Future Strategic Infill	Priority	Comments	Approx.
No.				Yield
				(du)
1.	Seaton	High	SAHA land Currently housing	300
			diversity zone. State appears to	
			be looking to further increase	
			density via code amendment	
2.	Visy Kilkenny	Low	Contingent upon closure or	1,300
			relocation	
3.	Hindmarsh	Medium	Requires closure or relocation	400
	Entertainment Centre			
4.	Hindmarsh Triangle	low	Requires further investigations	800
			into future industrial	
			employment lands with timing	
			linked to progression of other	
			strategic sites nearby	
	Centres			
5.	Kilkenny Arndale -	high	Subject to landowner interest,	700
			residential uplift is possible	
6.	Westfield - West Lakes	high	Subject to landowner interest,	1,000
			residential uplift is possible	
7.	Port Road – Suburban	high	Limited uptake to date but	300
	Activity Centre -		subject to MAB and Brewery site	
	Hindmarsh		development interest may grow	
	Corridors			
8.	Grange	low	Findon to Arlington Terrace	474
9.	Port Road -	low	South to Woodville road	609
			including Welland shopping	
			centre	
10.	Torrens Road	low	Brown Street to St Clair Avenue	400
			south side	
	Total			6,283

Table 6: Potential future opportunities for investigation

Assumptions:- approximate yields are based on gross density dwellings per hectare with 100% area developed for potential residential development. Projected yields are influenced by proximity to rapid transport, local amenity, mixed use market demand, public infrastructure requirements and community feedback. Final yields considerations will be subject to detailed future investigations and include but not limited to capacity of infrastructure, local amenity, market demand and community expectations (refer Map 17 below as to where they are located within the City).

10.Investigation Priorities

(High Priority 0-5 years; Medium Priority 5 to 10 years; Low Priority 10 years and beyond)

High priorities

- 1. Advocate for a north-west public transport strategy (State Government initiative)
- 2. SA Water Code Amendment (commenced and externally funded)
- 3. Character Area Code Amendment (Not commenced unfunded)
- 4. David Terrace and Kilkenny Streetscape Concept Plan only (Not commenced funding secured)
- 5. General Infill Precinct Investigations and Master Plan (Not commenced unfunded)
- 6. Kilkenny (Armada) and West Lakes (Westfield) Centres investigations and master plan (not commenced unfunded)
- 7. Port Road Hindmarsh Suburban Activity Centre investigations /master plan (Not commenced unfunded)
- 8. Seaton SAHA Renewal SA to undertake Master Plan (State Government initiative)

Medium priorities

1. Review of Strategic Employment Zone and Employment Zone lands (unfunded)

Low priorities

- 1. Review of the Hindmarsh Triangle Employment land (south of Manton Street) consisting of Strategic Employment Zone, Employment Zone and Suburban Business Zone land.
- 2. Subject to the timing of significant public transport improvements and legislative amendments for the provision of future public open space through developments of non-strategic sites Grange Road, Port Road and Torrens Road, investigations / master plan.



Map 17 – Investigation Priorities

11. Conclusion

The City of Charles Sturt has potential housing supply growth out to 2048 based on current Planning and Design Code policy without undertaking further policy Code Amendments under the State's Planning and Design Code. Significant work in flood mitigation, open space provision, public transport, employment creation and climate change adaption are required in key areas of the City where general infill is occurring.

To address these challenges Council requires support at the State Government level in regard to improved financial support and coordinated planning and infrastructure investment to ensure this inevitable growth does not adversely impact upon liveability of the City's suburbs.

With further identification and investigations the potential rezoning of strategic sites and policy amendments in the medium to long term within existing centres, a review of the City's Strategic Employment and Employment Zoned areas and in the longer-term investigations into some of the City's transit corridors a further approximately 10 years of potential housing supply growth based on current projections is possible.

This would provide the City potential housing supply growth City out towards 2057 based on an assumed annual housing supply growth of 700 dwellings per annum.

Appendix 1

Interactive map and layers:

 $\frac{\text{https://charlessturt.maps.arcgis.com/apps/instant/sidebar/index.html?appid=a1bb5c5ad38}}{74647a5423aa95fdade15}$

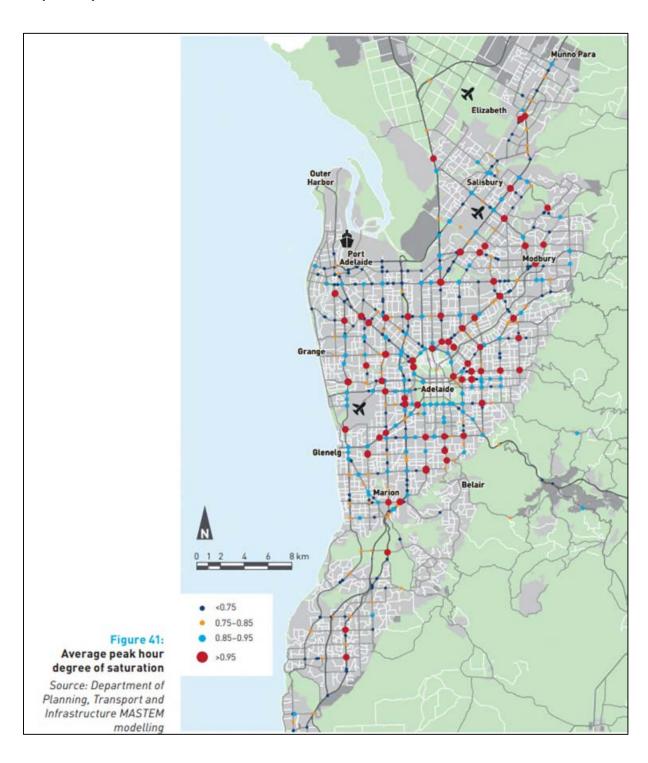
Map 1 - Stormwater and Flood management

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/e1b755c1d16e4d969f8b4c}{773da06ff2/data}$

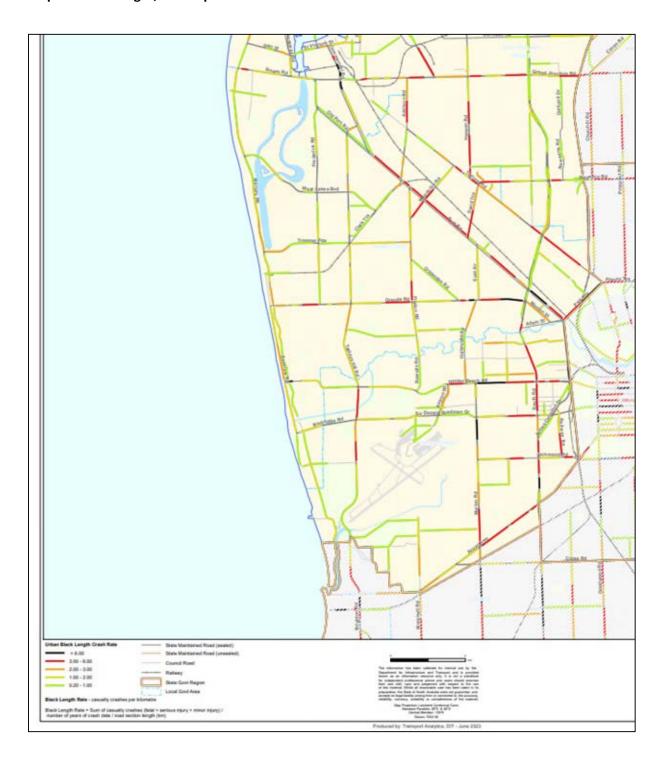
Map 2- travel time delay



Map 3 – Key intersections of interest



Map 4 - Black Length, Black Spot Locations



Map 5 - Public Transport Frequency and Accessibility

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/4884167b7da149e3b4564}{1570c073cb9/data}$

Map 6 – Urban Heat Island

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/23e65027b8d14e8d8fc3fb}{3de13e2aae/data}$

Map 7 - Distance to Reserve- Regional, District Local and Neighbourhood

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/77039e4560924e05b857c}{6634f701731/data}$

Map 8 - Street Tree Planting Program to 2025

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/24e0b7b0a8c0467c8a1ae}{0beffde5703/data}$

Map 9 – Social infrastructure

 $\frac{\text{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/375684511ca8431582985}}{\text{c8af3aa88f4/data}}$

Map 10- Social Infrastructure – Education

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/b057b09565d145fb9a2ef0}{1effa102b0/data}$

Map 11 – Local Activity Centres

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/889a8833249a4a0287fb1c}{156118ea4b/data}$

Map 12- Urban Employment

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/b2577dbf6e884eca80b68}{8e97ea66428/data}$

Map 13 – General Infill

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/a139e0eb44fa4ad3adaa4f}{286eacddb2/data}$

Map 14 - Strategic Infill

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/327392c98c564f1eba7086}{6516a1d08d/data}$

Map 15- Retail and commercial Zones

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/8c26bb10af41429aa5e3cf}{5e7582dd06/data}$

Map 16 - Your Neighbourhood Plan - Central Area

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/4fc61d0537ec471ab94384}{e307325f87/data}$

Map 17 –General Infill Hotspots

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/4930a6683e004fecb3f7f8}{71dd71bf28/data}$

Map 18 -Potential Growth Corridors

 $\frac{https://charlessturt.maps.arcgis.com/sharing/rest/content/items/6277a5dc22024efc9adc4e}{03d2f6341b/data}$

DTI:PlanSA Submissions

From: Delyth Taylor

Sent: Monday, 30 October 2023 2:06 PM

To: DTI:PlanSA Submissions

Cc: Murphy, Benjamin (DTI); Bridget Mather; Kim Duncan

Subject: RE: Submission – Greater Adelaide Regional Plan Discussion Paper

Attachments: Coorong District Council Greater Adelaide Regional Plan Discussion Paper response, signed

Mayor SImmons.pdf

Good afternoon

Please find enclosed Coorong District Council's response to the Greater Adelaide Regional Plan discussion paper in accordance with minute 255/23 resolved at Council's ordinary meeting on 17 October 2023, now signed by Mayor Paul Simmons.

255/23 RESPONSE - GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

Moved Cr. Rowntree, Sec. Cr. Arthur that Council approves the submission of the response to the Greater Adelaide Regional Plan Discussion Paper.

CARRIED UNANIMOUSLY

The contents of the submission are the same as the one enclosed in the email from Myles Somers on 19 October and it if you could use the one attached that would be appreciated.

Kind regards,

Delyth Taylor

Executive Assistant to the CEO		
×		

From: Myles Somers

Sent: Thursday, October 19, 2023 10:23 AM

To: plansasubmissions@sa.gov.au

Cc:

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper

Dear Plan SA

Please find attached Coorong District Council's response to the Greater Adelaide Region Plan Discussion Paper.

Kind regards

Myles

Myles Somers

Director Community and Corporate Services x



DISCUSSION PAPER-GREATER ADELAIDE REGIONAL PLAN

RESPONSE FROM COORONG DISTRICT COUNCIL -

Coorong District Council borders the southeastern extent of the Greater Adelaide Region. Importantly the town of Tailem Bend, which is featured on numerous maps within the Greater Adelaide Regional Plan Discussion Paper, is in the opinion of the Council, a peri-urban area having a strong connection with Mt. Barker and Murray Bridge.

Tailem Bend is a 15-minute commute by car to Murray Bridge, 40-minute commute to Mt Barker and just an hour to Adelaide CBD. Council strongly believes that the town of Tailem Bend should be considered as an additional urban growth contributor to the Greater Adelaide Region in association with the targeted growth of Murray Bridge.

The following points summarise the key elements of Council's strong advocacy to the Commission to include Coorong District Council and importantly, the towns of Tailem Bend and Wellington East, in strategic housing planned for the Greater Adelaide Region over the next 30 years.

COORONG GROWTH STRATEGY

In 2022 Council adopted a Growth Strategy that strongly aligns with State Strategies and particularly with the goals expressed in the Greater Adelaide Regional Plan Discussion Paper. Council's Growth Strategy identifies the growth dynamics of Mt Barker and Murray Bridge and the high likelihood that Tailem Bend will also experience very strong growth, largely due to its proximity and connection to these two centres.

The Growth Strategy can be viewed on Council's website at https://www.coorong.sa.gov.au/your-council/management-and-strategic-documents/coorong-growth-strategy

At the 2021 Census the population of Tailem Bend was 1705 with a total of 907 private dwellings. It is estimated that currently there are 422 allotments available in the town for housing. Significant land division projects have recently commenced representing a signal from the market that Tailem Bend presents an attractive developer investment opportunity.

Council has identified three growth scenarios for Tailem Bend which range from a modest low growth to a more ambitious high growth target. Prior to understanding the objectives expressed in the Discussion Paper, Council selected the medium growth target which provides for 2.5% growth over 30 years resulting in population growth to 3576 and an additional 850 homes.

In considering the Greater Adelaide Regional Plan Discussion Paper and projections for an additional 10,000 homes in Murray Bridge over the 30 years, Council now considers a high growth target as very likely outcome for Tailem Bend. Under this scenario population growth over 30 years results in the town growing to 5630.

To achieve this, an additional 1739 new dwellings would be required. Given there is significant vacant land surrounding the town on the eastern side, yet to be developed, a population goal more than 5000 delivered in an orderly, economic, and environmentally sustainable manner, is achievable.

An interim imperative from a strategic planning perspective, is to identify deferred urban land and avoid rural living developments that constrict urban growth in optimal locations. Given the projected growth of Murray Bridge, Council is willing to further explore residential growth scenarios for Tailem Bend and develop a Structure Plan aligned to Greater Adelaide Regional Plan and the Murray Bridge Growth Strategy. Support from the State Government to undertake this within the next five years would be of benefit to local and State economies.

CLIMATE IMPACTS AND BIODIVERSITY LOSS

Council acknowledges commentary in the Discussion Paper highlighting that climate impacts and biodiversity loss are major considerations that should see less growth in certain areas, such as the Adelaide Hills. With the opportunity to utilise connectivity provided by the Southeastern Freeway, growth of the region can be supported in Murray Bridge, and Tailem Bend. It should be noted that no residential areas in Tailem Bend or Wellington East were impacted by the recent River Murray floods. These towns also do not present high bushfire risk environments such as those in Adelaide Hills and Fleurieu districts.

DECENTRALISATION

Council supports the Discussion Paper objectives of decentralised growth and in particular along the eastern spike as represented by Figure 9 on page 126 of the Paper.

FOOD AND WATER SECURITY

Food and water security is also a very important theme in the Discussion Paper. Sustaining a population in excess of two million people by 2054 requires the protection of food production and water catchments.

Tailem Bend is on the edge of Greater Adelaide and included in the Murraylands region, a very significant area for the State's food production. The council recognises the economic contribution made to State and National economies through the Agricultural industry in our district.

Growth of Tailem Bend will not impact on the integrity of the district's agriculture industries. In fact, urban growth will support agriculture through attracting opportunities for allied industries and providing a labour force and associated housing. Importantly growth of Tailem Bend to over 5000 people by 2054 will result in a district population increasing from current 5463 to 10,000 people.

This would assist in overcoming a challenge faced by Council in funding the ongoing construction, reconstruction and maintenance of its road network consisting of 369 km of sealed roads and 1,518 km of unsealed roads.

This road network includes significant roads vital to the transport of goods including food destined for both domestic and exports such as grains, meat, fish and other food products.

LIVEABILITY

The Discussion Paper identifies 'liveability' as a key driver in the choice of locations for growth. The council asks the Commission to consider the exceptional lifestyle opportunities presented at Wellington East and Tailem Bend, both locations abutting the Greater Adelaide Region.

In these towns people are establishing affordable homes on larger than average blocks compared to those available in urban areas such as metropolitan Adelaide or Mt Barker. In the case of Wellington East many residents also enjoy river views. These towns are at the gateway to the Coorong yet close enough to Adelaide for business, visiting family and friends or other vital city trips.

Driving from Tailem Bend to Adelaide is a traffic light free experience at 110 km/phr for most of the journey. Such travel should not take more than an hour to arrive at the end of the Freeway at Glen Osmond Road. As Mt Barker reaches maximum growth over the next decade and Murray Bridge surges to 45,000 people by 2050, Tailem Bend and Wellington East become affordable locations to enjoy a prime lifestyle whether working closer to the city or taking advantage of working from home.

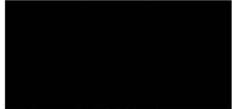
CHANGING MOBILITY SYSTEMS

Council is a strong advocate of State and National plans for duplication of Swanport Bridge a project featuring in Infrastructure SA Capital Intentions 2022 Report. This is likely to occur in the life of the Greater Adelaide Regional Plan 30 Year Vision, along with further improvements to the Southeastern Freeway and Princes Highway.

This brings Tailem Bend closer to the city in a similar way to the Heysen Tunnels having opened opportunities for the growth of Mt. Barker since 1990. A significant number of people already commute between Tailem Bend and Murray Bridge or Mt Barker daily. The growth of Electric Vehicles is likely to support this commuting behaviour through lower transport costs.

Public transport between Murray Bridge and Adelaide should be considered as part of the Greater Adelaide Regional Plan. With a population more than 45,000 Murray Bridge would have the scale to sustain a commuter service to Mt. Barker and further on to Adelaide CBD. There may be opportunities with rail or utilising the Southeastern Freeway to connect to a Rapid Transport Service from Mt Barker into the city.

In closing The Coorong District Council thanks, the Commission for the opportunity to respond to the Discussion Paper. Council congratulates the Commission and its staff for production of a thought-provoking, high-quality Paper featuring visionary content supported by sound evidence and expert advice.



Mayor Paul Simmons
COORONG DISTRICT COUNCIL

C 00 0570 2000

DTI:PlanSA Submissions

From: Meagan Jarmyn

Sent: Thursday, 2 November 2023 5:07 PM

To: DTI:PlanSA Submissions

Cc: Andrew Goodsell; Chris Hannaford

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper **Attachments:** Submission – Town of Gawler – GARP Discussion Paper.PDF

You don't often get email from

Learn why this is important

Good Afternoon,

Please find attached the submission from the Town of Gawler on the GARP Discussion Paper.

If you have any questions or concerns, please do not hesitate to contact Andrew Goodsell on

or via email

Kind Regards

Meagan

Meagan Jarmyn

Personal Assistant to Manager Development and Compliance TOWN OF GAWLER PO Box 130 Gawler SA 5118

T:

A liveable, cohesive, active, innovative and sustainable community

The Town of Gawler is committed to providing our customers with excellent service. If we can assist you in any way, please telephone (08) 8522 9211, email council@gawler.sa.gov.au or visit our website http://www.gawler.sa.gov.au
The information contained in this email is intended only for the named recipient only and may be confidential, legally privileged or commercially sensitive. If you are not the intended recipient you must not reproduce or distribute any part of this email, disclose its contents to any other party, or take any action in reliance on it. If you have received this email in error, please contact the sender immediately. Please delete this email from your computer. The Town of Gawler advises that, in order to comply with its obligations under the State Records Act 1997 and the Freedom of Information Act 1991, email messages sent to or received by Council may be monitored or accessed by Council staff other than the intended recipient. No representation is made that the email or any attachment is free of viruses or other defects. Virus scanning is recommended and is the responsibility of the recipient. THINK BEFORE YOU PRINT



OFFICE OF THE MAYOR

CC23/2133; CR23/76350

Town of Gawler Administration Centre

43 High Street Gawler East SA 5118

> PO Box 130 Gawler SA 5118

Phone: (08) 8522 9211

council@gawler.sa.gov.au gawler.sa.gov.au

24 October 2023

Contact: Andrew Goodsell

AG:mj

Ref:

Planning Commission Chair
Mr Craig Holden
C/- Growth Management Team, Planning and Land Use Services (PLUS)
Department of Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

Email: plansasubmission@sa.gov.au

Dear Mr Holden

Re: Submission - Greater Adelaide Regional Plan - Discussion Paper

The Town of Gawler has closely engaged with its community in its consideration of the Greater Adelaide Regional Plan (GARP) Discussion Paper. Most recently this has been through a workshop attended by 50 people on 18 September 2023.

In addition, Councillors have attended several briefings from our staff and engaged directly with John Stimson (Commission Member) and PLUS staff on the 13 September. Town of Gawler has also hosted a regional consultation of Council planning staff, organised by PLUS.

The Discussion Paper

In response to Discussion Paper Council is able to provide you a high-level analysis of issues raised in the Discussion Paper via its Primary Submission (**Part A**). A total of 15 recommendations have been identified by Council. The focus of the GARP Discussion Paper on Gawler and its region in welcomed with three key issues for Gawler arising from the Discussion Paper:

- Expansion of the Metropolitan Open Space System and the creation of inter urban breaks and a new Northern Parklands.
- Kudla and Evanston being identified as a growth investigation area
- Use of the High Population Projection Series for growth modelling.

The issues of how and where we grow are generally addressed in the Discussion Paper. However, there is a need for greater levels of collaboration with all growth

corridor councils on mechanisms for the funding and delivery of social, environmental, economic and transport infrastructure.

Living Locally

The concept of Living Locally comprises a set of principles to guide future development. With respect to thinking more broadly about how communities function and planning accordingly, Living Locally has merit. As far as it goes.

What is absent is detail on how the principles of Living Locally can be applied in outer urban areas such as Gawler, especially in new master planned communities. We see opportunities for Renewal SA to be a leader in this space, given their role in housing, landholdings and scope to deliver best practice urban development.

Growth Projections

It is noted that the GARP uses the Plan SA, High Growth Series for population projections. However, the growth rates in Gawler have been overstated in the last six years and possibly for longer. Given how critical it is to fund and develop infrastructure on time, it is reasonable that the State Government regularly update its projections.

The impact of Concordia on Gawler and its growth rates are a case in point. As such the inclusion of The Town of Gawler in the Structure Planning for Concordia should be emulated in other planning projects.

Overall, a medium projection is more realistic than the higher projection based on historical trends. But further explanation in GARP as to the growth assumptions favouring one scenario over another needs further development. Linked to this, the different implications with respect to required urban investigation areas, transport and other infrastructure should also be reflected upon.

Collaboration, the inter-urban break and working together

The Greater Adelaide Regional Plan represents a unique opportunity for the Town of Gawler to collaborate with its community and the State Government to develop coordinated growth in the Gawler Region. Nowhere is this more apparent than in the opportunity to work together on detailed planning for a northern parklands and inter-urban break. Concurrent with this submission, Council staff will seek to work closely with Renewal SA, PLUS and City of Playford to further develop a set of principles and actions that give a clear concept, scope and timeline for delivering the northern parklands and inter-urban break.

In relation to how the Town of Gawler will seek to deal with issues on a precinct basis, the Southern Rural Areas (SRA), Discussion Paper is provided. The SRA Discussion Paper has not at this stage been endorsed by the Council. However,

it has strong synergies with the GARP Discussion Paper and existing State Planning Policy, particularly in relation to the concept of a greenbelt and the identified Growth Investigation Area for Kudla and Evanston. (see **Part E** of this submission). It is intended that an Engagement Plan for the SRA Discussion Paper will be provided to Council in late 2023 with stakeholder engagement starting in early 2024.

I look forward to further engagement with the State Government and the Planning Commission to help coordinate growth in our region to the benefit of existing and future residents.

Kind Regards

Karen Redman Mayor

Direct line: Email: Mayor@gawler.sa.gov.au

Town of Gawler Submission

Greater Adelaide Regional Plan Discussion Paper (GARP)

Part B Primary Submission



(source: Sweet Lime) October 2023

Introduction

A new Greater Adelaide Regional Plan (GARP) is being prepared by Planning and Land Use Services (PLUS) on behalf of the SA Planning Commission. To progress this project, a GARP Discussion Paper ('the Discussion Paper') has been released identifying fundamental elements including principles and aspirations that will drive the new Plan.

This new Plan will update the existing 30-Year Plan for Greater Adelaide (2017). The new Plan will seek to ensure that there is a supply of housing and employment land for the next 15 to 30-years, noting that supply for the next 15 years is reasonably secure. Specifically, and of direct relevance to the Town of Gawler, PLUS will undertake detailed investigations into potential future residential and employment land growth areas, as well as other key investigation areas that will inform the regional plan. It is expected that this work will occur in 2024.

The purpose of Council's submission on the Discussion Paper is to provide the SA Planning Commission and ultimately the Minister with Council's views on regional strategic planning and specifically issues that affect the Town of Gawler.

Strategic Direction of Discussion Paper

The Greater Adelaide Regional Plan is a high level document that primarily deals with land use planning and infrastructure issues in Metropolitan and Greater Adelaide.

Whilst Council has a key role in local planning, including code amendments, the macro picture of where growth should occur and in what form is established via the regional planning process. In this context the Discussion Paper has focused on housing supply and **how** and **where** we should grow?

Four outcomes are proposed to guide how Adelaide should grow (**Figure 1**). Unfortunately, the planning system by itself has limited levers to achieve these outcomes. A whole of government, industry and community strategy is required to fully address these issues.



Figure 1. Outcomes and principles for Greater Adelaide (Discussion Paper, 2023, p36)

The format of the submission below begins with some overall comments, followed by specific recommendations.

State Planning Policies

The State Planning Policies (SPP) are one of the major levers in the planning system to provide policy guidance and planning outcomes in these areas. This is achieved at the Development Application (DA) stage as applications for use and development are assessed against State Policies under the Design Code through the portal.

The Discussion Paper seeks to strengthen these SPPs to promote Integrated Planning (SPP 1), Biodiversity (SPP 4), mitigate Climate Change (SPP 5) and Energy (SPP 12). These key planning policies that have been identified in Discussion Paper and their proposed improvements are outlined in Table 1.

Opportunities to strengthen State Planning Policies

State Planning Policy (SPP)	Ideas to strengthen SPP for Gawler
Integrated Planning	Identify sites for infill serviced by rapid public transport This
(SPP 1)	supports the Kudla growth investigation area
Biodiversity (SPP 4)	Identify new regional open space, biodiversity corridors and
	greenbelts and increase tree canopy cover
Climate Change	Expand MOSS. Support urban water strategy for
(SPP 5)	sustainability frameworks for master planned developments
Energy (SPP 12)	Identify locations for renewable energy infrastructure for
	community energy generation and battery schemes at the
	land division stage

Table 1 Ideas to Strengthen State Planning Policy

Additional State Planning Policies that require strengthening

Three policy areas that do not have a strong focus in the Discussion Paper and are important to Gawler are Cultural Heritage (SSP 7), Primary Industry (SPP 8), and Natural Hazards (SPP15). Refer to table 2 for further details on these matters.

Cultural Heritage (SSP 7) particularly concerning built form and aboriginal heritage are not fully addressed in the Discussion Paper. Heritage is a key element of Gawler's identity, the town itself being surveyed by Colonel Light and settled in 1839. Gawler is still seeking the recognition of the Church Hill, State Heritage Area, through the establishment of a Heritage Standard. A stronger focus on heritage can help define both how and where we can grow.

In relation to Primary Industry (SPP 8), the Discussion Paper has not proposed to enhance the policy framework. Given, the productive agricultural land in Hillier, relative proximity to recycled water schemes and a reluctance to expand Environmental Food Production Areas (EFPA), it is desirable to strengthen the Primary Industry SPP 8. The link between SPP8 and rural land with known economic value (that is not subject to an EFPA overlay) such as Hillier is something that should be more clearly addressed. Council is happy to share the economic modelling analysis of the Rural Zone around Hillier undertaken by the Barossa Gawler Light Adelaide Plains RDA (2022) to assist in updating the analysis contained in the Discussion Paper.

The final area that lacks policy direction is Natural Hazards (SPP15). This is particularly true of flood hazards. The Gawler River starts in the Gawler Township at the confluence of the North and South Para Rivers. While the State Government has recently updated the 1 in 100 year flood mapping, hazard overlay, there is concern that these flood events may occur more frequently with climate change. As such, consideration should be given to recalibrating flood mapping to respond to climate change and potentially increased severity flood events.

State Planning Policy (SPP)	Ideas to strengthen SPP for Gawler
Cultural Heritage (SPP	Need to provide a Heritage Standard for Church Hill.
7)	Government to recognise the role of heritage and character
	in infill and growth investigation areas
Primary Industry	Determine with Government and industry the best policy to
(SPP 8)	protect primary industry and horticultural areas
Natural Hazards (SPP	Recognise the role climate change can have concerning
15)	flood hazard overlays. Consider more regular updates
	based on climate and flood modelling

Table 2 - Heritage, Agriculture and Flood Mapping - Strengthen State Planning Policy

Renewable Energy, Climate Change and Trees

The Discussion Paper supports the development of renewable energy generation. However, it is noted that the ranking of State renewable energy generation (Discussion Paper, p.46) is not an appropriate representation of renewable energy use as applicable to urban development. There are also opportunities to reserve sites on the urban fringe for renewable electricity generation. Opportunities for community energy generation and battery schemes can be determined at the land division stage.

Council in 2022 adopted a comprehensive Climate Emergency Action Plan (www.gawler.sa.gov.au/services/climate-emergency). This was reinforced at the Community Information Forum on 18 September 2023 where it was proposed that climate change considerations should inform all issues.

There is significant community interest in tree canopy cover targets in the 30 Year Plan for Greater Adelaide. Gawler is seeking to increase tree canopy cover from 15% to 30% by 2045. Reflecting on how State Government can support the efforts of developers and local government to increase canopy cover is worthy of further attention.

Integration with Growth Areas such as Concordia and Roseworthy

One of the largest challenges facing Gawler in the medium and longer term is accommodating the growth from the previously approved growth investigations areas of Roseworthy and Concordia – especially Concordia due to its envisaged population size (>22,000 new residents). These areas will inevitably rely on Gawler's services and community facilities and will share the same road network, drainage and open space systems, public transport and other urban infrastructure. This is both a threat and an opportunity.

Gawler, is seeking to address these challenges through comprehensive engagement with both industry and Government. In particular, Council is undertaking two key strategies, namely *Gawler 2046* Growth *Management and Infrastructure Framewo*rk and the *Gawler Integrated Transport Strategy* - both of which will be completed in 2024. It will be essential for other regional Councils and the State Government to support these sub-regional strategies to ensure growth opportunities and integrated planning outcomes are maximised. Council has

already been in discussions with HIPDU, charged with preparing the Concordia structure plan to work closely with Council on these challenges.

The Discussion Paper proposes to develop a 'living locally' approach to existing and new development. Overall, this is supported. But to be delivered, further thinking is warranted on how existing and new urban growth can functionally operate such that the urban entity as a whole is greater than the value of the individual components. This should occur irrespective of which LGA boundary the land to be developed sits. Whatever that administrative future of Concordia, Gawler will double in size over the next 20+ years as an urban entity and how this is done is therefore critical. Living locally will mean investing in support services to ensure new residents as well as existing have the resources they need to have the choice not to travel extensively beyond the district and region for education, health, support services and jobs.

Specific areas of interest for future planning will include effective public transport, including rail and bus linkages into Concordia. This could include prioritised road links to the Sturt Highway as a more direct entry into the Barossa as opposed to Murray Street and Lyndoch Road. Concordia also requires new water, sewer and stormwater schemes that are efficient and sustainable. Strong pedestrian and cycle linkages are required between Concordia and Gawler with the Gawler CBD only some 700m distance from Concordia. Concordia and other growth areas all require the provision of social infrastructure. SPP1 mandates these issues get the attention they deserve.

Further, to advance the Living Locally principles, access from Concordia to employment areas in Roseworthy, Edinburgh and Adelaide CBD will be critical. The employment capacity within Roseworthy will mean east-west linkages will be vital and effectively a triangular set of links between land in Light (Roseworthy), Concordia (currently in Barossa) and Gawler/Willaston (Town of Gawler) will be needed.

Population Projections

In relation to population projections, it is noted that the Discussion Paper uses the high growth projection series for future planning. The 2017 and previous 2010 regional plan both overestimated population growth rates.

The population in Gawler LGA has grown from 23,355 residents in 2016 to 26,123 in June 2022, which is a growth of 12% over six years. The population of Gawler between 2016 and 2021 has been below state forecast (which use the high growth scenario). Population growth over the five years between 2016 and 2021 averaged 390 residents per annum compared to forecasts of 684 per annum. However, there has been considerable variability in growth between years with 2022 resulting in an estimated 819 residents. In turn this has resulted in an average growth forecast of 647 residents per annum between 2021 and 2026.

Figure 2 below, demonstrated that Plan SA (State) forecast between 2016 and 2022 have been overstated by approximately 185 residents per annum. Nevertheless, the growth is estimated to increase over the next forecast period to 2026.

With the lag between zoning, dividing and servicing land, there is merit in providing a supply that meets the historic growth rate but also has additional capacity where one landowner chooses to develop when another does not. The medium projection gives that additional capacity, allowing for also a more effective response to the required investment in local facilities and support services (see earlier comments under living locally).

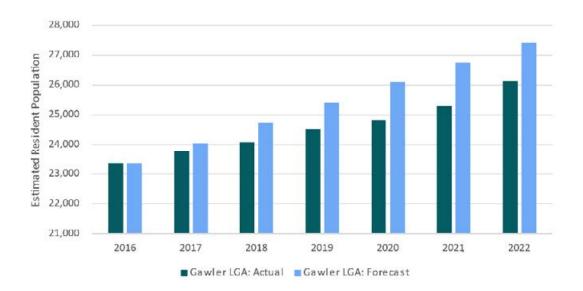


Figure 2. Gawler Population 2016 – 2022 Actual versus Forecast growth

- Forecasts are as at 2021 and 2026 years in between assume consistent growth.
- Source Australian Breau of Statistics and Plan SA

Given that growth rates in Gawler have been overstated in the last six years it is reasonable that the State Government use a medium growth scenario for growth and planning projections in Gawler and its region.

Recommendation 1:

A regional view of Gawler is required within the GARP Discussion Paper

Historically the township of Gawler has operated at a regional role. This has ebbed and flowed over time, but the regional role still exists for the wider service catchment with respect to education, health care, government services, retail and commercial services.

The Town of Gawler recognises the important role of the GARP Discussion Paper and seeks high levels of collaboration with adjacent councils and the State Government to maximise the potential development and environmental opportunities in Gawler and its region.

With careful planning, Gawler will continue to provide a regional service role to the north, into the Barossa, Light and Adelaide Plains areas. Noting however that the Town of Gawler is already of a size approaching that of Mt Gambier, change needs to be carefully managed and supported to ensure it is not solely viewed as an urban extension of Munno Para.

Furthermore, the population growth planned for, must be co-ordinated with support services. Significant investment and support will be required to support a growing and more diverse community, whether it be in health care, allied services, community support for special needs, education and so forth whilst building upon the existing character of settlement. If Living Locally has merit, Gawler should be a place where it is fully supported, building on the history and landscape features that encourage people to settle in the area.

Recommendation 2:

That the updated version of the GARP Discussion Paper provides a whole of government approach to the future social, economic, or environmental challenges facing Adelaide and Gawler over the next 30 years.

The housing focus of the Discussion Paper is strongly evident. But there are many consequential outcomes and delivery of physical and social infrastructure to enable new residents and existing residents to both benefit is the key.

Trunk infrastructure, especially water and sewer for instance will need to be carefully managed to sequence growth in an affordable and orderly fashion. Private developers should not be required to fund the shortfalls of funding by SA Water in key growth areas for instance.

The response to emergency management will need to be contingent of existing and future risk factors and appropriate response times and agreed service levels. These risks will likely change as the climate changes, development becomes more dispersed (extended) along the growth corridor and more extreme events occur.

Infrastructure planning will need to be responsive to growth corridor directions, as suggested in the GARP Discussion Paper. Existing and new growth should not result in socially and economically isolated new housing estates where the trade offs between housing affordability and social connectedness are significant. Future growth planning will need to be more sophisticated and widely considered, beyond simply more homes to how communities function.

Recommendation 3:

The GARP Discussion Paper should demonstrate that the State Government has the levers to address and manage change.

Clear articulation of the strategic levers that will be used to link urban growth with community needs should be fully set out in GARP.

The key supporting strategies, frameworks and the timing of these will be essential if confidence in managed growth is to be secured across the region.

Recommendation 4:

State Planning Policies in the environmental areas are strengthened to deal with climate, water, energy, primary industry, heritage and biodiversity challenges in the future.

A focus on how this can be achieved, even if via multiple methods, would be of assistance for consideration at the regional planning level.

Recommendation 5:

Provide for locally distributed energy infrastructure including generation and battery storage.

With extended growth corridors already in existence and further extended potentially under the new GARP eg Concordia there is a distinct opportunity to think differently on how electricity infrastructure is delivered, much like with water and sewer treatment and water recycling. Decentralised infrastructure should be considered further.

Whilst the Adelaide region has developed historically on a spoke and wheel model relying on infrastructure 20-30km distance (or further) eg Bolivar treatment plant, rail etc, new decentralised models of infrastructure delivery should be explored and informed by costbenefit analysis, environmental efficiency and risk.

Recommendation 6

Climate change considerations should inform all issues.

This can be considered in terms of trunk infrastructure (sewer, water, stormwater harvesting) but also in terms of neighbourhood residential planning.

With respect to trunk connections, the GARP Discussion Paper canvasses infrastructure issues from water and other trunk connections. It also promotes orderly and sequenced development. However, there is a need to develop mechanisms to address the funding and coordination of infrastructure. This type of response is essential to provide orderly development, particularly in greenfield areas. Central infrastructure agencies such as SA Water and SA Power Networks can play important roles in predicting bottlenecks and provision of infrastructure concurrently with growth.

Concerning the important roles of trees and canopy cover, specifically, across the relatively open Adelaide Plains (incl Gawler), there is an observed lack of tree canopy cover in many new master planned estates. It is noted that in many infill and Master Planned Neighbourhood zones the tree canopy cover overlay does not apply. This should be revisited.

Code provisions should also be examined relating to tree planning in front setbacks to ensure individual housing developments can better manage their own micro-climate.

Also at the building design level, banning dark roofed homes would be highly advisable to reduce onerous air conditioning demands in summer. This is being increasingly discussed in both Victoria and NSW (see Fraser Rise in Melbourne where dark roofed homes are banned, recent policy debate in NSW State Government) and has little or no financial impact on builders or the development industry.

Recommendation 7

Seek the State Government update its population projections for the region regularly in collaboration with Councils rather than selecting the High Projection Series.

The historic trend in the outer north and specifically the Town of Gawler is of growth closer to the low or medium population projection than the high. More analysis of the growth projection with a more 'bottom up' approach using local data would assist in giving more accurate growth assumptions. Refer to recommendation 8 for further details.

Recommendation 8

Town of Gawler will as part of its *Gawler 2046 Growth Management and Infrastructure Framework* will seek to develop a clearer regional population model.

It is important that estimated growth rates are accurate and regional population projection models are regularly updated. In particular, these models will help plan for new schools, social infrastructure and trunk and transport infrastructure.

Triggers and benchmarks should be developed for key community needs including social, economic and environmental infrastructure. A region population model will be developed as part of the Gawler, 2046 Growth Management and Infrastructure Framework.

Recommendation 9

Provide more advice on how to increase housing affordability and increase choice.

This should not be simply a question of more housing supply but the type and quality. The GARP Discussion Paper should explore how housing diversity and affordability can be achieved <u>concurrently</u>. This links to the matter of the 'missing middle of housing supply in Greater Adelaide' ie townhouses, not just apartments and single detached dwellings.

The GARP Discussion Paper should be addressing access to greater choice, including affordable, adaptable and accessible housing. It is noted that the Outer North has presently a low percentage of infill developments (11%) versus greenfield (83%). This is reflected in the existing lack of housing choice and diversity.

Renewal SA can play a role in the expansion of housing choice on its land and demonstrate best practice. This could include the development of new housing styles suitable for railway stations and key bus routes on the northern line. Missing middle housing should be seen as a viable housing choice, not something forced by affordability constraints on households.

Whether code provisions (or even taxation arrangements) should be modified to incentivise or reduce costs for missing middle housing stock should also be explored. This could relate to stamp duty, land tax fees, application assessment fees, assessment timelines or a range of other mechanisms being considered in partnership with the development sector.

Recommendation 10

Encourage the State Government to take a lead role in promoting housing choice and diversity in new master planned communities with specific reference to transit orientated development areas.

The State Government has electrified the Gawler line with a \$842 million upgrade, which was completed in 2021. To take advantage of this investment, the State Government should collaborate with councils to identify rezoning and redevelopment opportunities.

Recommendation 11

Have a stronger focus on the implementation, funding and coordination of growth.

In particular, a legislative-supported mechanism should be provided where standardised developer contributions are provided for the upgrade or installation of trunk and community services. Infrastructure should include utilities, road transport, health, community centres and associated facilities.

Recommendation 12

Living Locally is supported as a concept in the Discussion Paper, but clarity is sought on how to develop it in an outer urban or greenfield environment.

Gawler is recognised with Parkside and Norwood as a good example of the Living Locally concept, which is highlighted below:



Figure 3 Living Locally principles

One practical way of dealing with the challenges of living locally is to pilot a greenfield "Urban Village" model in Gawler and explore infrastructure funding from relevant Commonwealth and State agencies. Again, Renewal SA could be a driver of such an approach.

To be more meaningfully progressed in GARP, some clear examples of successfully applying living locally principles (benchmarking) either in Australia or overseas should be considered along with clear mechanisms for how it can inform local strategic structure planning.

Recommendation 13

Objectives, targets and goals in the GARP Discussion Paper need to be identified and made clearer.

How can we measure the success of the GARP Discussion Paper over the next 30 years while also responding to global issues such as climate change and local issues of supply and demand for housing and services? Identification of key growth benchmarks and indicators can

be essential to manage growth. These benchmarks can be developed to ensure that in a growth or regeneration area thresholds can be identified for schools, hospitals, and other social services.

In Gawler, there is a Childcare Index, where Council measure and map childcare places approved. In the last 18 months, Council has approved 759 childcare places. This is a proxy population growth indicator to identifying growth pressures. Coordination and mapping of these and other growth indicators could be a key role undertaken by the population unit in the State Government.

To measure success, objectives and targets need to be identified. Growth metrics need to be more than the quantum of new dwellings achieved. Suggested additional areas might include:

- Local employment lands (15 years supply). This is separate from regional employment lands which are for larger scale uses developed over longer time lines.
- Housing diversity targets eg missing middle housing such as townhouses.
- Proximity of housing to effective public transport, especially rail and key bus routes.
- Active and passive recreation ratios of land to housing linked to canopy cover and climate change.
- Ratio of jobs proportionate to new dwellings

Recommendation 14

a: Council supports Gawler being identified as a potential for Growth Investigation Areas.

In the GARP Discussion Paper, there is a welcome focus on Gawler. These outcomes have been informed by engagement with the community of Gawler on 18 September 2023 (see **Part C**). The highlights for Gawler are:

- Urban investigations starting in Kudla and extending north to Evanston for a master planned extension of Gawler.
- Potential development linked to electrified rail and other local infrastructure.
- New northern parklands and inter urban break that separates Gawler from the City of Playford.
- Greater emphasis on open space and expanding the Metropolitan Open Space System (MOSS).

b: The concept of a new Northern Parklands and the creation of a greenbelt that meets the Minister's objectives of an inter urban break to clearly separate Gawler from Playford is strongly supported.

The creation of a greenbelt in Gawler has been a long-held goal of the Council and the community. Protection of vistas into Gawler should also include the views from both Main North Road and the rail line.

It is recognised that the actual location of such a greenbelt needs to be carefully master planned with government agencies, property owners and community groups. The Council is prepared to work with key Government Agencies: Renewal SA, PLUS, and the Department of Environment and Water to establish a well delineated greenbelt that serves a range of functions.

Consideration should also be given to an appropriate greenbelt between Gawler and Roseworthy. The use of MOSS (2010) overlay is not the most efficient scheme to secure a publicly owned greenbelt in Gawler.

c: Detailed Community Engagement on potential development options is required

The GARP Discussion Paper identifies potential development around Kudla and Evanston South, linked to electrified rail and other local infrastructure. Investigations in the Kudla Affected Area and Evanston South, linked to electrified rail and other local infrastructure will require detailed community engagement on potential development options.

That collaboration will need to extend to property owners to determine the function, form and location of the Gawler greenbelt to act as an active and passive recreational area that enhances biodiversity.

It is noted that the GARP Discussion Paper mentions Evanston Gardens as part of the Growth Investigations Area, where it seems more likely that it would include Evanston South, where Renewal SA have substantial holdings.

Land situated around the SEAGAS pipeline in the foothills should not be seen as an urban investigation area due to visually exposed location and setbacks required to important trunk infrastructure.

Recommendation 15

The Northern Parklands are funded and managed to ensure Gawler maintains its separate identity.

A full list of recommendations is provided in **Part D** of this submission.

Summary of Submission

What will Gawler look like in 30 years? This submission is the primary response from the Town of Gawler concerning the Greater Adelaide Regional Plan and as such provides a high level analysis and recommendations to issues raised in the GARP Discussion Paper.

In relation to how the Town of Gawler will seek to deal with issues on a precinct by precinct basis the Southern Rural Areas (SRA) Discussion Paper is provided to the SA Planning Commission as an example of how Gawler is seeking to manage growth.

The SRA Discussion Paper has not at this stage been endorsed by Council and therefore has the status only of a working draft. However, it has strong synergies with the GARP Discussion Paper particularly in relation to the concept of a greenbelt and the identified Growth Investigation Area for Kudla and Evanston. The SRA Discussion Paper is therefore provided in **Part E** of this submission to GARP. It is intended that an Engagement Plan for the SRA Discussion Paper is provided to Council in late 2023 with formal engagement starting in early 2024.

While a total of 15 recommendations have been identified in response to the GARP Discussion Paper, they all have a common theme of promoting best practice environmental and urban development, while also seeking to ensure Government has the levers to both manage and measure success.

This Submission to the Greater Adelaide Regional Plan represents a unique opportunity for the Town of Gawler to collaborate with its community and the State Government to develop:

- a greenbelt that meets the long term aspirations of Gawler;
- a whole of Government approach to growth to address social, economic and environmental challenges;
- funding models for greenfield trunk, transport, and social infrastructure; and
- an *urban village* model with best practice environmental design with a lead role for Renewal SA in delivering built outcomes to demonstrate expectations to the wider development sector and community as a whole.

Greater Adelaide Regional Plan

18th September at the Civic Centre

Background

An estimated 51 people attended the Community Information Forum at the Town of Gawler to discuss the Greater Adelaide Regional Plan. The people included members of the public, environmental groups, residents, agriculturalists, and businesses from the area with Councillors and Council staff.

These notes are primarily derived from the round table written responses and have informed the Town of Gawler's response to the Greater Adelaide Regional Plan.

Three questions were asked of the eight round tables and written, and verbal feedback was provided to the following questions:

- 1. Which other key area/policies need to be addressed?
- 2. Do you support greenbelt proposals and how should it look and function?
- 3. How will the community be engaged in developing potential options for the identified growth investigation area?

Community Response

1. Which other key area/policies need to be addressed?

Gawler has an opportunity to be a major regional centre based on its central position and population growth. Key strengths and sectors for Gawler to build on are: medical, aged care, professional services, emergency services, commerce, education, retail and entertainment. Support to strengthen biodiversity and food bowl options was also outlined.

Climate change considerations should inform all issues. Where we should grow should be restricted based on hazard (flood and bushfire) overlays. Population projections should be based on medium growth options with the shortfall provided via infill development.

The provision of infrastructure from water to community services needs to be coordinated and funded.

2. Do you support greenbelt proposals and how should it look and function?

There was a need for a greater definition of what a greenbelt is and how it works with the new *Northern Parklands* concept. All round tables supported the concept of a greenbelt with some of the following characteristics. The greenbelt should:

- Have a rural character, linked to the hills face zone and creek lines connecting to walking trails and sports precincts.
- Not be on private land unless acquired.

- Alternative view: Be a mixture of private and public land.
- Investigate the use of master planning and zoning options for the greenbelt.
- Be located on Renewal SA land, with inter urban break being land south of Dalkeith Road.
- Preserve vistas and provide for both passive and active recreation.
- Have a mechanism for open space to be delivered and funded.

3. How will the community be engaged in developing potential options for the identified growth investigation area?

All tables supported community engagement in relation to growth with the following options:

- Opportunity to develop an urban village at Kudla Train Station similar to Lochiel Park as a model for development in Northern Adelaide.
- Rail line should incorporate cycling and walking paths. Expand housing choice and housing affordability in Kudla. This will provide more options to fill in the *missing middle*. Ensure tree planting and smart design including in new master planned communities.
- Opportunity to consider a range of block sizes from higher density around the train station to lower density beyond walking distance.

Part D Summary of Recommendations for GARP

Recommendation 1

A regional view of Gawler is required within the GARP Discussion Paper.

Recommendation 2

That the updated version of the GARP Discussion Paper provides a whole of government approach to the future social, economic, or environmental challenges facing Adelaide and Gawler over the next 30 years.

Recommendation 3

The GARP Discussion Paper should demonstrate that the State Government has the levers to address and manage change.

Recommendation 4

State Planning Policies in the environmental areas are strengthened to deal with climate, water, energy, primary industry, heritage and biodiversity challenges in the future.

Recommendation 5

Provide for locally distributed energy infrastructure including generation and battery storage.

Recommendation 6

Climate Change considerations should inform all issues.

Recommendation 7

Seek the State Government update its population projections for the region regularly in collaboration with Councils rather than selecting the High Projection Series.

Recommendation 8

Town of Gawler will as part of its Gawler 2046 Growth Management and Infrastructure Framework will seek to develop a clearer regional population model.

Recommendation 9

Provide more advice on how to increase housing affordability and increase choice.

Recommendation 10

Encourage the State Government to take a lead role in promoting housing choice and diversity in new master planned communities with specific reference to transit orientated development areas.

Recommendation 11

Have a stronger focus on the implementation, funding and coordination of growth.

Recommendation 12

Living Locally is supported as a concept in the Discussion Paper, but clarity is sought on how to develop it in an outer urban or greenfield environment.

Recommendation 13

Objectives, targets and goals in the GARP Discussion Paper need to be identified and made clearer.

Recommendation 14

- a. Council supports Gawler being identified as a potential for Growth Investigation Areas
- b. The concept of a new Northern Parklands and the creation of a greenbelt that meets the Minister's objectives of an inter urban break to clearly separate Gawler from Playford is strongly supported.
- c. Detailed Community Engagement on potential development options is required.

Recommendation 15

The Northern Parklands are funded and managed to ensure Gawler maintains its separate identity.



Contents

Exe	ecuti	ve Summary	iii		
	Key	findings	iii		
1	Introduction				
	1.1	Study area			
	1.2	Potential land use scenarios			
2	Precinct Profiles				
	2.1	Major property ownership	3		
	2.2	Allotment size analysis	4		
	2.3	Analysis based on five precincts	5		
	2.4	Snapshot of the five precincts	5		
3	Str	ategic Planning Policy Framework	7		
	3.1	30 Year Plan for Greater Adelaide (30 Year Plan)	7		
	3.2	State planning policies	8		
	3.3	Local planning policy			
		3.3.1 Land use zoni. ıg			
		3.3.2 Flood hazard mapping and bushfire hazard happing			
		3.3.3 Metropolitan Open Space Strategy (MOSS)	9		
	3.4	State Planning Commission letter (15/11/22) regarding rural living			
	3.5	Housing affordability and employment land	10		
4		dies Completed and SRA Overview			
	4.1	A contested planning landscape			
	4.2	Foundation Planning Studies			
		4.2.1 Southern Gawler Growth Options Study (1997)			
		4.2.2 Jensen Reports (2015A & B)			
		4.2.3 Arris Report 2022			
		4.2.4 RDA Hillier and Kudla Economic Report 2023			
	4.3	Other Council strategies that inform future planning for the Rural Zone			
		4.3.1 Gawler Community Plan 2030+			
		4.3.2 Town of Gawler Open Space, Sport & Recreation Plan 2025	15		

5	Infrastructure			
	5.1	Water	17	
		5.1.1 Potable (mains) water	17	
		5.1.2 Stormwater and recycled water	18	
	5.2	Sewer	18	
	5.3 Traffic, transport and rail			
	5.4	Summary of infrastructure	19	
6	Cha	aracter and Vision Development2	21	
	6.1	One possible vision?	21	
	6.2	Precinct Fact Sheet2	22	
7	Inv	olving Our Community2	23	
	7.1	Recap2		
	7.2	Managed growth – a precinct approach2	24	
8	Cor	mmunity Engagement and Project Init _tion2	26	
	8.1	Broad approach2	26	
	8.2	Staging of investigations	26	
Ref	erer	nces2	28	
Арр	end	dix A Precinct maps	\1	
Apr	end	Six B Precinct fact sheets	11	

Executive Summary

The Southern Rural Areas (SRA) sits in the southern section of the Town of Gawler immediately north of the rapidly growing City of Playford and within the outer northern growth corridor of Adelaide. Within the SRA there are a wide range of uses and development found on ground, from agricultural businesses and commercial horticulture around Hillier to lifestyle housing in Kudla, commercial businesses on Main North Road and even a cemetery.

This Discussion Paper seeks to describe the potential zoning of the SRA. By doing this, the intention is to fund (via an agreed funding model with landowners) and complete the relevant studies to support code amendments to reflect that desired future.

It is accepted that with the growth pressures in Metropolitan Adelaide and close proximity to existing urban development within the City of Playford, the Adelaide–Gawler passenger rail corridor and nearby urban facilities that these pressures for urban growth will be ongoing. The ecently released raft Greater Adelaide Regional Plan (GARP 2023), Discussion Paper identifies the SRA as a Growth Investigation Area. As such the release of this Town of Cawler, Discussion Paper on the SRA is timely.

The State Government's GA . Is seeking 700,000 when uses were the next 30 years. Kudla and Evaluation Gardens have been identified as the beginning of a growth investigations corridor.

For a line in the land analysis of the SRA Technical Paper should be referenced.

Key findings

Notwithstanding pre ious land use debate over whether the SRA should remain entirely Rural zoned, a mix of Rural and Open Space, Rural Living or other solution, a managed growth approach is the only logical pathway for future planning of the SRA.

The SRA should be visualised as five distinct precincts, each with their own land use vision, zoning, overlays and numeric variation provisions to shape and guide use and development. How this would be delivered is described below. In essence:

- Precinct 1 (Hillier and part of Kudla) comprises the alluvial floodplain adjoining Gawler River and the bulk of existing local agricultural businesses. This land has a larger lot size than Kudla and holds the greatest capability for ongoing horticulture and value-added industry. The Rural Horticulture Zone is a logical zoning, consistent with the City of Playford zoning to the immediate south.
- Precinct 2 (Kudla Affected Area) sits east of Hillier and is more fragmented than Hillier. Precinct 2 has in many cases little prospect of sustainable agricultural use. As a transitional zone to the City of Playford, there is logic in zoning of a density consistent with prioritising vegetation and residential amenity. The Rural Neighbourhood Zone is an option. Notwithstanding, any areas within 800m walking distance of the Kudla train station should be given Deferred Urban zoning pending further planning around the appropriate housing density along the train stations of Kudla and Tambelin to the north.
- Precinct 3 (Evanston South) comprises land centred on Main North Road, with larger allotments and to small business clusters. Getting the balance right between greenbelts, sporting facilities and business clusters is central to a successful outcome here. A detailed masterplan should be developed with the community and property owners. This masterplan will aim to preserve Gawler's identity and include a gree selt whilst allowing orderly growth.
- Precinct 4 (Gawler Foothills) comprises the scenic foothills above the Adelaide Plains. The existing rural zoning remains appropriate, with additional controls via limited division overlays, limited dwelling overlays and other controls. This will preserve the amenity of existing residents and recognises the terrain and existing land use pattern.
- Precinct 5 (Gawler River Corridor) comprises land abutting the Gawler River to a width of approximately 100m. Gawler River has significant ecological significance. It also has an extensive history of flooding. The application of Open Space zoning with similar zoning to the immediate west enables future opportunities for a walking trail network that extends towards the coast.

A full set of maps is provided at **Appendix A** with the overall indicative zoning map and supporting maps is provided at Figures 1–3.

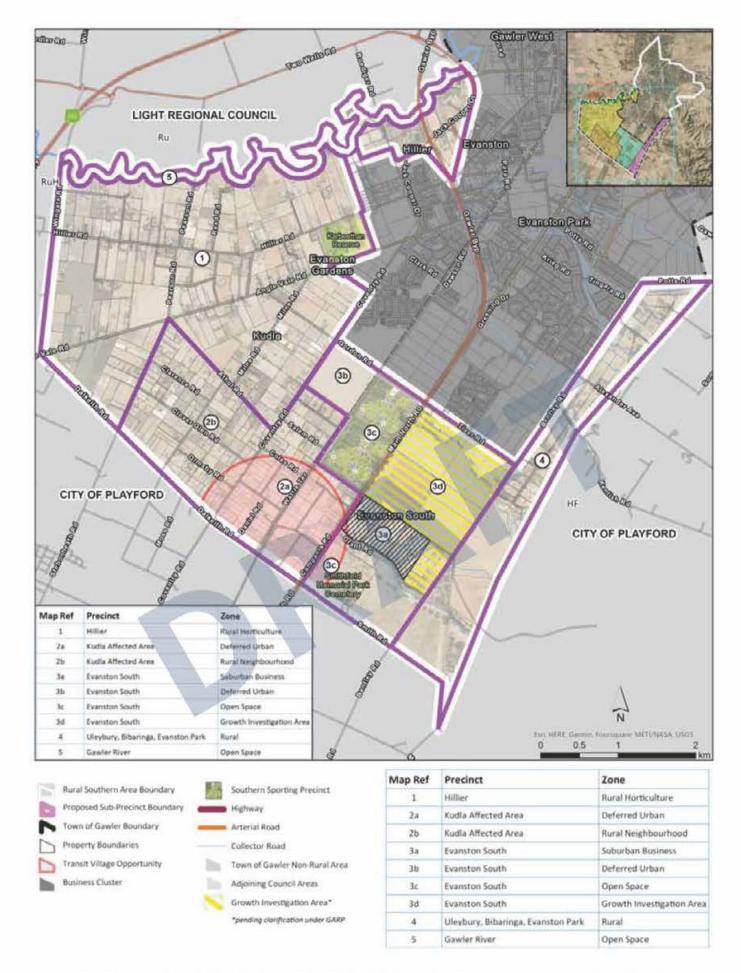


Figure 1. Outline Zoning Map - Southern Rural Areas (Source: Town of Gawler) indicatative zoning and land use.

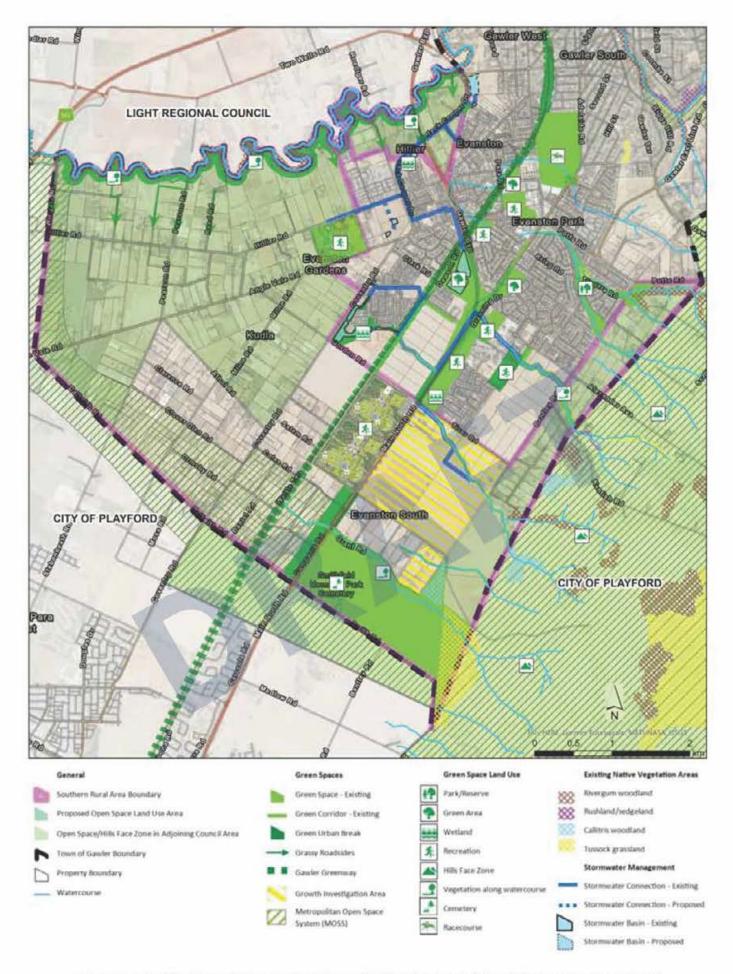


Figure 2. A possible vision of a green corridor along Main North Road within a green open space network (Source: Town of Gawler)

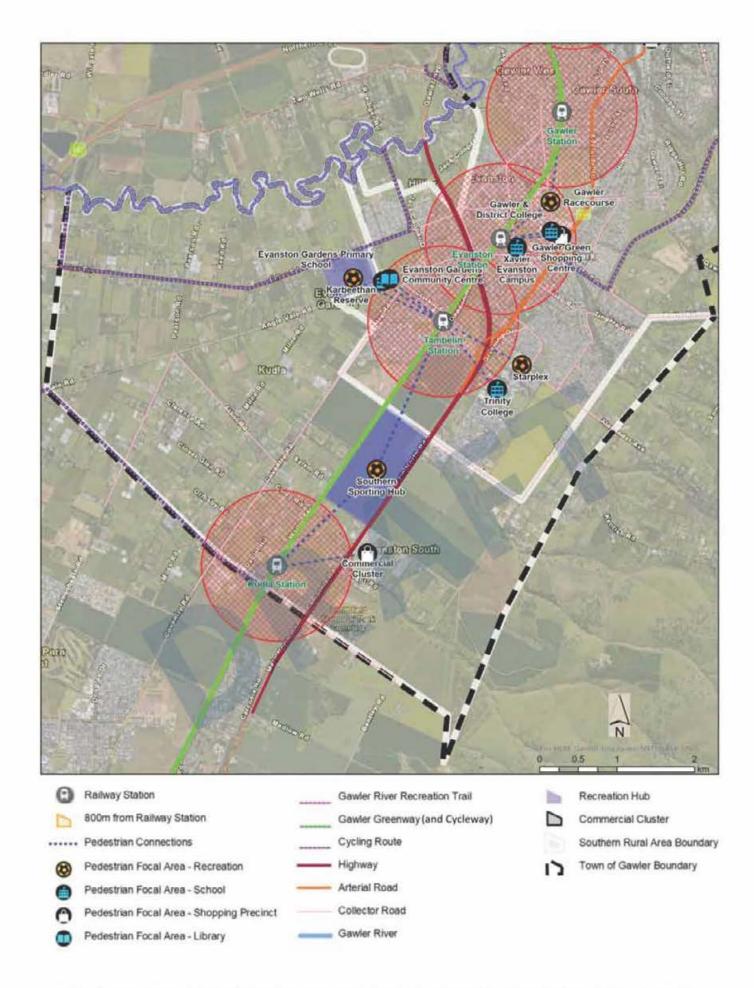


Figure 3. A possible network solution for walking and cycling trails. Pedestrian and cycle trail networks will warrant more detailed planning prior to any code amendments within the SRA (Source: Town of Gawler)

Introduction

In this section the study area is described and potential land use opportunities are referenced.

1.1 Study area

The Rural Zone is Gawler's largest zone comprising an area of 1,635 hectares. The area is bounded by the Gawler River to the north, Wingate Road to the west, Dalkeith Road, and Smith Roads to the south, and the foothills of the Mount Lofty Ranges to the east.

The northern part of the Rural Zone is within the Gawler River floodplain. The soils are of good quality and with access to a wide range of water sources from the Gawler River, to aquifers and recycled water schemes. Southern Gawler has been historically a key part of South Australia's agricultural indust

For over 30 years, rapid growth has occurred along the outer nort. region of Greater Adelaide. This has entailed the establishment of entire new residential estates – Blakeview, Aspire, Orleana Waters, Mawson Lakes and a host of others. Defence industries at Edinburgh have become major employers within a corridor defined by manufacturing, warehousing and logistics stretching from Elizabeth to Port Adelaide. Wi Lin this growth corridor sits the SRA

A wide range of uses are found within the SRA, from agricultural businesses and commercial horticulture around Hillier to lifest housing in parts of Kudla and commercial businesses on Main North Road. The question for the past 30 years has been about the future of the SRA in a land use sense. This Discussion Paper sets out the evidence, the air ilable data and potential zones that warrant furthe consideration to confirm the code amendments required to be funded and deli ered.

1.2 Po ential land use scenarios

The Rural Zone has a mix of rural character with low intensity housing. However, it is facing challenges of under investment in primary production and a lack of a clear vision for future development. Ongoing debate on the future of the SRA has fuelled speculation and investor uncertainty.

There are at least four principal future uses likely within the future planning of the SRA, that will be tested in preparing code amendments, namely:

- Boutique (niche) horticulture as the area moves away from less profitable orchards and broadacre farming to niche high value crops, often under greenhouse conditions. Exemplar businesses that point to future growth are the Food Forest (nut orchards), Native Foods (indigenous produce), and flower and plant nurseries.
- A greenbelt to make provision for new recreational facilities and green links along arterial road corridors. Walking tracks, a sports precinct, linkages to Karbeethan Reserve, flanked by the Gawler River and the Gawler Foothills.
- Residential use of a density to be determined. Noting that the Greater Adelaide Regional Plan supports a Growth Investigation Area starting at Kudla, providing opportunities for greater housing choice and diversity near the train stations.
- Light Industrial/warehousing or business cluster uses typically provided by arterial road frontages and proximity to gro which cridors. These typically would provide local scale jobs.

Other use options will also be tested in preparin the code amendment, with in each of the precincts proposed.

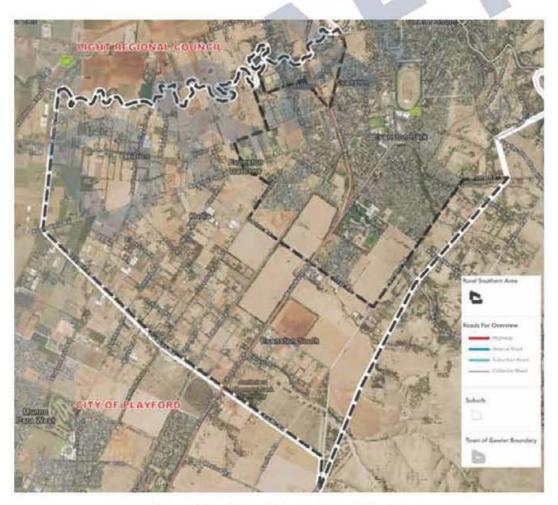


Figure 4. Study Area (Source: Town of Gawler)

Precinct Profiles

2.1 Major property ownership

The SRA comprises over 500 individual allotments with an average lot size of 3.2 hectares. Most owners hold only one property. The exception is Hillier, where almonds orchards and nurseries are located.

In Evanston South, broadacre farming on larger allotments (20–30 ha range) occur. All bar one of these larger allotments is held by Renewal SA (Figure 5). Renewal SA land holding in the rural zone comprise 178 hectares and its future use is pivotal to the future of the SRA. RenewalSA also owns 115 hectares (outside of the SRA) of undeveloped land north of Gordon and Tiver Road zoned residential, 46 hectares of which is around Tambelin Station.

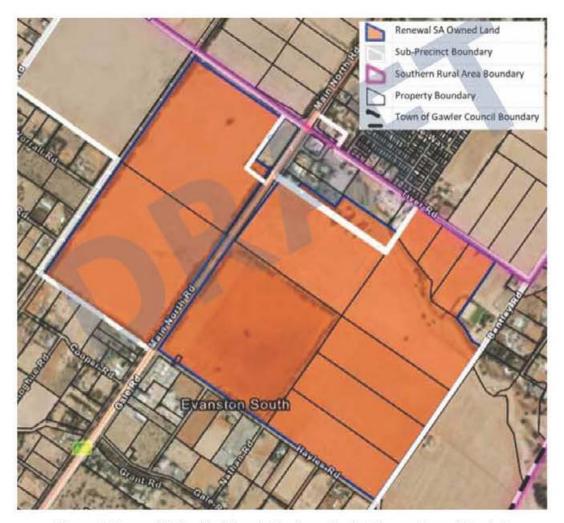


Figure 5. Renewal SA land holdings in Southern Gawler (Source: Town of Gawler)

2.2 Allotment size analysis

An analysis of the allotment sizes can shed light on the use of land as well as potential future use opportunities. Three ranges emerge:

- Small 1 4,000m²
- Medium 4,001 25,000m²
- Large 25,001 100,000m²

These lots sizes are represented Figure 6 and form the basis of definable precincts.

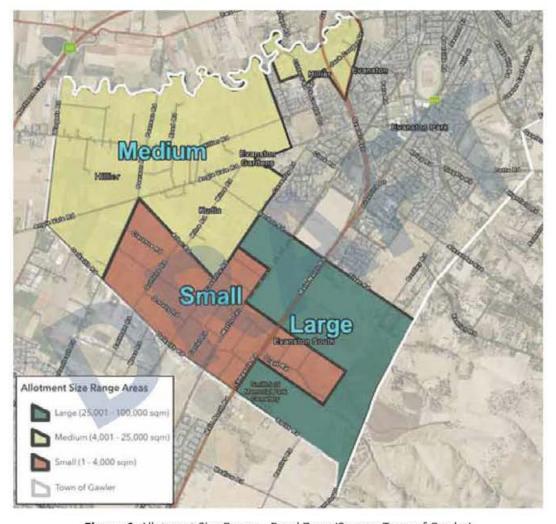


Figure 6. Allotment Size Range – Rural Zone (Source: Town of Gawler)

2.3 Analysis based on five precincts

High-level analysis identifies that small sized allotments (under 4 ha) in Kudla Affected Area primarily are used for various forms of rural living. This is visible by the size of dwellings, built form, landscaping and lack of evidence of agricultural activity.

Medium sized allotments (4 – 25 ha) in Hillier and northern Kudla are primarily used for horticulture. This was identified in the Regional Development Australia (RDA) Barossa analysis of existing businesses in the SRA.

Large sized allotments (over 25 ha) are primarily used for broadacre farming.

On this allotment structure two additional areas are overlayed due to their landscape characteristics: Gawler River Corridor and the Gawler Foothills. The Gawler River Corridor can provide part of a riverine corridor opportunity to create a walking trail to the coast. The Gawler Foothills, abutting the Playford, Hills Face Zone include: Uleybury, Bibaringa, and parts of Evanston Park due to topography is distinctly separate from land holdings on Son North Road hich is on lower ground.

2.4 Snapshot of the five precincts

The population in the SRA was 432 people in 1985¹. Based on dwelling numbers and occupancy rates typi al of the area, the current population is estimated to be 873 people in 2023. These figures can be arrived at via (Figure 7 and Table 4).

¹ Exact figures for the SRA today cannot be verified by the ABS due to local collector boundaries such as Hillier (Area Code SAL 40593) including the large retirement park on Hillier Road. In Kudla (area code SAL40724) similar challenges exist. However based on dwelling numbers and occupancy rates approximate population figures can be arrived at.

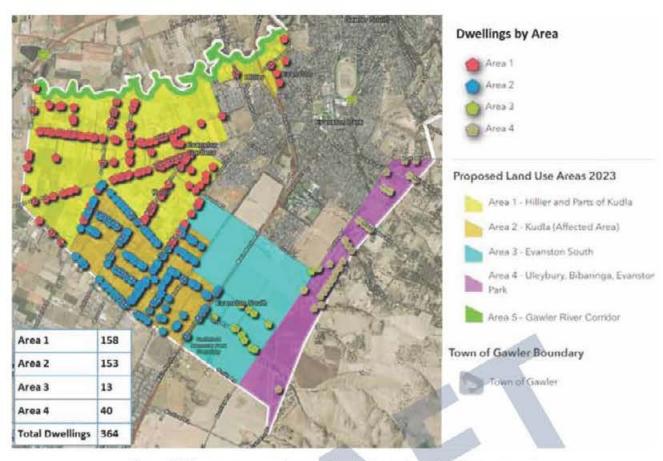


Figure 7. Five areas or precincts, with existing private dwellings mapped.

AREA	Hectares	Numbe Allotme	Avg Lot size in hectares	Dwellings	Estimated population
Area 1: Hillier & parts of Kudla	713	198	3.6	158	379
Area 2: Kudla Affected Area	309	215	1.44	153	367
Area 3: Evanston South	313	47	6.62	13	31
Area 4: Uleybury Bibaringa & Evanston Park	199	42	4.74	40	96
Area 5: Gawler River Corridor	100m wide for 6 km	8	2.83	0	0
TOTAL	1635	510	3.2	364	873

Table 1. Key lot size and dwellings numbers within the SRA via precincts

Strategic Planning Policy Framework

3.1 30 Year Plan for Greater Adelaide (30 Year Plan)

The 30 Year Plan (2010) saw a new focus on Gawler and its growth potential. It identified Gawler as one of five transit corridors and encouraged local government to facilitate transit-oriented development at Tambelin Station. In addition, it identified new growth areas in Roseworthy and Concordia. The northern Adelaide growth corridor incorporates the SRA (Figure 8).

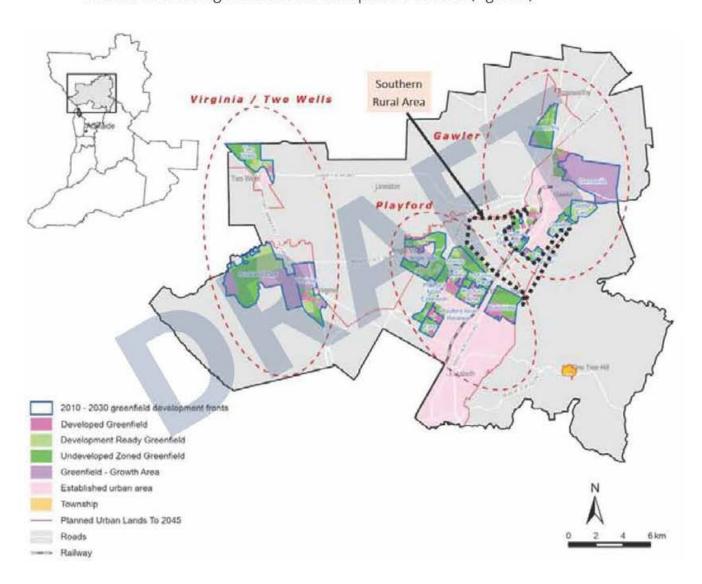


Figure 8. Greenfield supply in Metropolitan Adelaide is within corridors. Gawler and SRA are within this corridor (source: PlanSA, 2021)

Over decades the SRA has been farmed, more recently for horticulture. Interspersed with these uses is the relics of previous agriculture visible (polyhouses, sheds etc). There is also newer housing visible around Kudla. On Main North Road a mix of industrial, commercial uses and rural land is found. Today the SRA forms part of Adelaide's largest growth corridor with active development at Playford Alive (Renewal SA), Blakeview (Lendlease), and the rapid growth of Evanston South and Evanston Gardens.

More recently, in August 2023 a Discussion Paper for the Greater Adelaide Regional Plan (GARP) was released for engagement (SPC, 2023). It is anticipated that it will be adopted after consideration in late 2024. GARP has identified Gawler and Roseworthy as one of seven Growth Investigation Areas. The draft report states that:



Kudla provides an opportunity for a master planned extension to the Gawler township that takes advantage of recent government investments in electrified rail. Investigations in this area would include the establishment of an inter-urban break in the form of a new northern parklands that separate Gawler from the City of Playford and provide new public open space and recreation opportunities. (GARP 2023, 120)

3.2 State planning policies

As a statutory instrument under the Planning, Development and Infrastructure Act 2016, State Planning Policies outline the planning and design ambitions for South Australia and guide both regional and metropolitan planning and development in the future. Those of relevance to the SRA are set out in the Technical Paper provided separately.

3.3 Local planning policy

3.3.1 Land use zoning

Under the statewide Planning and Design Code, the zoning of land within the SRA is set out in Figure 9. The maps show open space zoning to the immediate south, together with Rural Neighbourhood zoning south of Kudla and a Rural (Horticulture) Zone fronting the Gawler River in Playford.

The gas pipeline overlay runs through the eastern side of the SRA. With limited exception, the SRA is entirely within the Rural Zone with deferred urban (DU) land or masterplanned neighbourhood (MPN) to the near north of Kudla, along Gordon and Tiver Roads.

Within the Town of Gawler there is no open space zoning along Gawler River, which is inconsistent with the zoning on the same river within City of Playford and a matter that should be resolved.

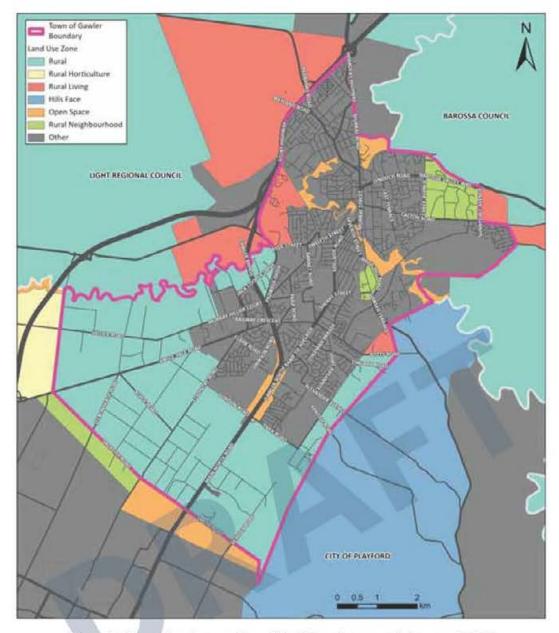


Figure 9. Current land use zoning within SRA and surrounds (source: SAPPA)

3.3.2 Flood hazard mapping and bushfire hazard mapping

Both hazard overlays are addressed in the Technical Paper.

3.3.3 Metropolitan Open Space Strategy (MOSS)

The 30 Year Plan (2010) sought to introduce several planning initiatives including provision for a "Gawler Buffer", as a defining area between the northern suburbs and the entrance to the Town of Gawler. This Plan identified the southern boundary with Playford as Metropolitan Open Space System (MOSS), creating a greenbelt between Gawler and Munno Para. The aim was to create a greenbelt link to Playford Hills (Figure 14).

The clarity of the 30 Year Plan (2010) on provision of greenspace being delivered via MOSS was lost in the 2017 version where it was no longer a stated policy position by the State Government.

Moving forward, in 2023 the Discussion Paper for GARP (2023) again reiterates the sentiment of the 30 Year Plan (2010) and supportive of a greenbelt between Gawler and City of Playford. In particular, it seeks to 'Revise and expand the MOSS to improve access to quality, functional open space' (GARP, 2023, 55).

While this policy approach is welcomed, the actual MOSS overlay is shown on private land which may need to be purchased by Council – an extremely costly undertaking. As part of this SRA analysis, it is proposed to critically review the greenbelt policy and provide a new approach that links open space, sporting facilities and green corridors. The aim is to preserve Gawler's distinct identity and is clear on the mechanism for how this can be funded and secured.

One option is to establish a new Metropolitan Open Space System (MOSS) based on Council and State Government owned land and new green corridors linking open space in a networked manner. The new MOSS zone could for instance run north south from the Gawler River and Karbeethan Reserve o a new Southern Sporting Precinct and Department of Environment an Water land on Gawler's southern boundary with Playford. The proposed worth south McSS is depicted earlier in Figure 2 of this Discussion Pape and alternative options is for a greenbelt to run along Gordon and Tiver and say to find the green urban break/ Growth Investigation Area (identical in Figure 1 and Figure 2).

3.4 State Planning Commission letter (15/11/22) regarding raral living

The Chair of the State Planning Commission wrote to the Town of Gawler Mayor in November 2022 regarding rural living options to the effect that: "rural living ... can result in the inefficient delivery of services, removal or fragmentation of viable primary production land, as ell as lead to conflict with more intensive surrounding farming operations." The letter included in the SRA Technical Paper further indicated that they will: "not support any Code Amendment seeking to facilitate rural living at this time".

3.5 Housing affordability and employment land

The ongoing need for more housing supply in the northern corridor and State Government direction on employment lands is addressed in some depth in the Technical Report. There has been increasing emphasis by State Government on these issues in the last 12–18 months.

Studies Completed and SRA Overview

4.1 A contested planning landscape

Divergent views exist on the way forward within the SRA that has spanned decades, likely dating back to 1985 when boundary changes transferred Kudla and Hillier to Gawler (Figure 10). Plans for a wide buffer or parkland some 1.6km wide around select towns including Gawler date back to the Playford²/Dunstan³ State Governments of the late 1970's (Jensen, 2015A).

- **1995** Council Strategic Directions Review includes options for a greenbelt in the Rural Zone
- **1995** Petition seeking to rezone Hillier, Evanston Gardens, and Kudla to urban
- **1997** Southern Gawler Growth Options Study first comprehensive study of Rural Zone
- 2002 Gawler and State Government sign Memorandum of Understanding (MoU) for green belt and transport investigations
- 2006 Urban Boundary Development Plan Amendment (DPA) reduces block sizes in Kudla
- 2008 Southern Rural Gawler, Development Framework to provide rural living and buffer zone
- 2011 Rural Areas Community Forum 80 people attend to promote urban development
- 2011 Cor unity groups campaign against DPA
- **2011** Southern Rural Areas DPA Council withdraws DPA
- 2015 Jensen Reports 1 and 2 issued
- 2018 Council prepares Statement of Intent for Rural Areas DPA Minister seeks to delay
- 2022 Council supports additional investigations into rural industries
- **2023** Council supports a Discussion Paper on the Future of the Rural Zone

Figure 10. Time capsule

² Premier for SA from 1938-1965 (source: www.centreofdemocracy.sa.gov.au/collection/south australias longest-serving-premier/)

³ Premier for SA from 1967-68 and 1970-79 (source: www.samemory.sa.gov.au/site/page.cfm?u=239)

4.2 Foundation Planning Studies

4.2.1 Southern Gawler Growth Options Study (1997)

The Southern Gawler Growth Options Study (1997) was a collaborative study between local government in the region: Gawler, Kapunda, Light, Barossa and Munno Para. The State Government was also a major participant, led by the Department of Housing and Urban Development. The study sought to resolve transport issues around a Gawler bypass to the Barossa. It also identified a future horticultural use for the area and sought to promote a green belt or buffer. Council initially supported the report and proceeded to consultation. The report received 67 submissions.

The most contentious proposal was a possible Eastern Gawler link Road to the Barossa. There was a wide variety of opinions of the benefits and disadvantages of residential or rural living development in the Hillier, Evanston Gardens, and Kudla areas and similar divergence of views on open space and g and a proposed green belt. Council and the State Government did not implement the study.

4.2.2 Jensen Reports (2015A & B)

Council resolved in October 2013 to endorse the Town of Gawler Strategic Directions Report 2013–17 and a brief for a Rural Land Use and Infrastructure Investigation was agre a upon and funded in 2014/15. To e net result was the Jensen Repo and as a background paper May 2015) and policy recommendations (May 2015).

Wit at the Jensen background paper (1 sen, 2015A) it was observed that the majority of the study area is curre tly zoned to promote agricultural activities but also allows for the division of land down to 4 and 0.9 hectares in the Kudla Affected Area axis of ay be counterproductive to the goal of the current Rural Zone, being to retain the area for agriculture.

It was also observed that some types of industrial development, particularly on the main entrance to Gawler, is contrary to the objective for the Rural Zone. Scope for a green buffer outcome along Main North Road in the vicinity of Dalkeith Road/Smith Roads was identified. The existing size of land holdings make it difficult to undertake many forms of agriculture. Whilst rural living was recommended in Kudla, no cost benefit analysis has been done on rural living.

A vision was developed, describing three key functions of this area. These are to function as a buffer, offer opportunities for further intensive productive agricultural land uses, and offer further rural living comprising rural living on large, attractive, vegetated and well managed allotments. Spatially, the vision is set out in Figure 11.

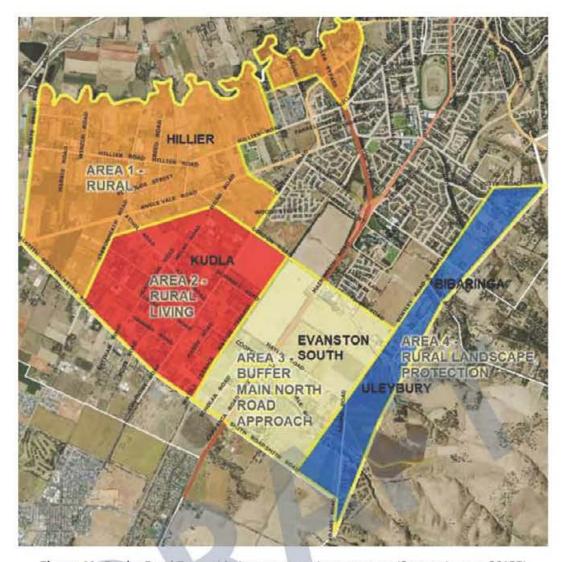


Figure 11. Gawler Rural Zone with 4 areas as per Jensen report (Source: Jensen, 2015B)

4.2.3 Arris Report 2022

The Land Capability Assessment for the Gawler Rural Zone (Arris Report 2022), was unde taken or examine the viability of the Rural Zone for agriculture. The report highlights the suitability of the area for horticulture), noting that soils in general are not a limitation for primary production in the Gawler Rural Zone. Whilst 90% of the area is composed of landholdings of 5 ha or less, the Gawler Rural Zone was suited to small intensive annual horticultural or small scale perennial horticulture.

Water was the main limitation to economically viable primary production⁴. But there are a range of water resources that could potentially be explored to meet the requirements of an expanded rural zone from urban stormwater harvesting, to accessing recycled water from the Virginia Pipeline Scheme (winter water) and NAIS schemes. Based on the assumption of adequate water, there is the potential for the Gawler Rural Zone to produce niche horticultural enterprises with closeness to Adelaide Markets.

4.2.4 RDA Hillier and Kudla Economic Report 2023

In late 2022, Regional Development Australia (RDA), Barossa Gawler, undertook economic modelling of businesses in the SRA. A total of 18 businesses of relevance to the investigations were assessed (Figure 12). Economic value was modelled at a gross margin of \$13.2M p.a for the region, before taking into consideration multiplier effects. Some 164 FTE can be attributed to this industry.

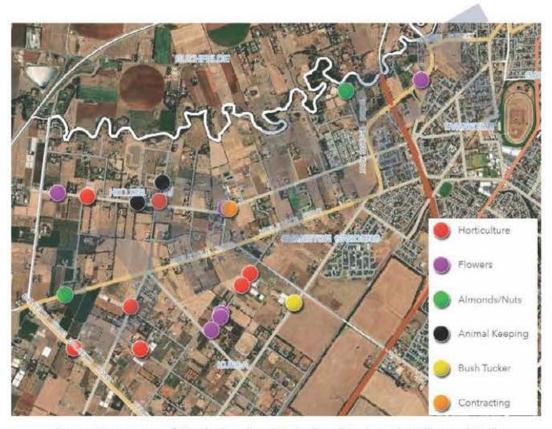


Figure 12. Mapping of Horticultural and Agricultural Business in Hillier and Kudla (Source: RDA, 2022)

^{*} Consistent advice from Industry is that water access is determined by sufficient landowner agreement to guarantee a contract bulk supply of water and a commercial agreement with SAWater. There is information that confirms interest exists either side of Gawler River for such agreements to be further developed and refined. Its not the cost of water that determines its demand but rather the crops that provide returns consistent with the market price for water (pers comms Jamie Kock Northern Adelaide Plains Food Cluster).

4.3 Other Council strategies that inform future planning for the Rural Zone

A brief summary of key local strategies is provided below (a full assessment is provided in the Technical Paper).

4.3.1 Gawler Community Plan 2030+

The Gawler Community Plan 2030+ is the Council's highest level strategic document and a reflection of future aspirations for Gawler. The Vision Statement is that the 'Town of Gawler is a liveable, cohesive, active, innovative, and sustainable community'.

The Community Plan has five goals. The first two: Identity and Growth are potentially competing goals, but can be compatible through a managed growth framework.

- **Goal 1 Identity:** Gawler remains unique and distinct om its neighbouring area. This has been articulated as safeguarding views and vistas and provision of open space.
- **Goal 2 Growth:** Managed and Sustainable. This goal seeks to provide social and physical infrastructure and connect people and culture.

Indeed, the challenges facing Gawler and its community means that a viable Town Centre is not guaranteed. Council and the commonity must get the balance right between identity and growth, through detailed masterplans and considered open space. This SRA Discussion Paper will seek to create and maintain a riverine environment that reflects the social, cultural, and landscape values of the river corridor. This can be supported by affordable, appropriate, and sustainable water for horticultural/agricultural purposes as a priority.

4.3.2 wwn of G wler Open Space, Sport & Recreation Plan 2025

Since 2016, meaningful progress has been made in the implementation of this plan, including adoption of the Karbeethan Reserve Master Plan in 2019. A key element of the Master Plan was the need to expand the Reserve, allowing for sporting and community infrastructure to cater for projected growth. Council has recently invested \$2.5M acquiring land for future expansion of the reserve⁵.

⁵ Council has commenced in 2023 a \$3M upgrade to sporting infrastructure that will provide significant benefits to all sporting users of the reserve – Gawler Rangers Baseball Club, Gawler & District Softball Association and Gawler Eagles Football Club.

Within the SRA, the Plan identified the development of a regional Sporting Precinct with potential sites in the rural zone south of Gordon and Tiver Roads' east or west of Main North Road. The Plan notes that the "new sportsground would help to maintain a separation between the northern suburbs of Adelaide and preserve Gawler's open landscape character."

This Southern Sporting Precinct could be used to relocate the existing users of Eldred Riggs Reserve – South Gawler Sporting Club (Australian rules, cricket, netball) as well as the Gawler RSL from their current location in Gawler West. An initial concept plan for the Southern Sporting Precinct (Figure 13) features various community recreation opportunities such as a dog park, playspace and community court. These activities could be extended south to complement a potential green urban break on the east side of Main North Road.



Figure 13. Southern Sporting Precinct (Source: Town of Gawler)

Design for area south of Gordon Road.

The linking of Karbeethan Reserve and the proposed Southern Sporting Precinct on Main North Road would provide an important step in the development of a green belt in the southern area of Gawler.

Infrastructure

5.1 Water

Water, both in terms of quality and quantity has been identified as a constraint, especially for horticulture. Urban development through water harvesting practices can provide an opportunity to apply recycled stormwater. In addition, a number of other water resources are accessible in the area.

5.1.1 Potable (mains) water

SA Water has suggested that they cannot invest in trunk lines for water through Kudla, though at time of writing updated capital works programming is expected in late 2023. More generally, mains water can be achieved through an augmentation charge for the area via private deed or other mechanism between the lead developer and utility. Mains water currently runs throug parts of the area as identified in Figure 14.

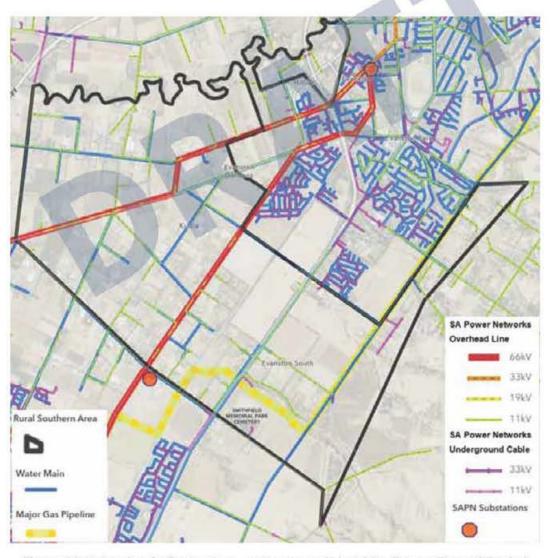


Figure 14. Networks of Infrastructure - water, gas and electricity (Source: Town of Gawler)

5.1.2 Stormwater and recycled water

Reducing minimum allotment sizes across the Rural Zone will increase residential densities and lead to increased impervious surfaces. This will in turn increase stormwater runoff and place pressure on existing stormwater management infrastructure. The stormwater if appropriately harvested could provide additional water for both horticulture and open space. The challenge is lot fragmentation. This fragmentation increases the difficulty to develop a Precinct wide stormwater harvesting system.

A number of recycled water systems abut the area including:

- Barossa New Water Scheme
- SA Water Virginia Pipeline Scheme (VPS) Scheme with a connection point on Angle Vale Rd
- Bunyip Water with a connection point on Wingate Road
- City of Playford reuse scheme with a connection poi con Curtis Rd,
- Northern Adelaide Irrigation Scheme (NAIS) _age 2

A local water reuse scheme is being pro sed for the Hillier and Evanston Gardens area⁶, where stormwater snoff can be provided to Karbeethan Reserve. This link between urban development and open space could be extended to horticulture.

5.2 Sew 4

A major trunk line runs along Stebonheath Road from the City of Playford into Angle Vale Road and Evanston Gardens. Whether this needs augmentation is yet to be confirmed but will nere to be further considered as it will also be required to serve future of direct releases linked to RenewalSA land within and outside the SRA.

Presently, the provision of trunk sewer within the SRA is limited and expansion of the network may be considered appropriate. This would likely be provided by developers in conjunction with SA Water.

_

⁶ Referenced in Deeds issued around 2013.

5.3 Traffic, transport and rail

The effect of increasing residential yields by reducing minimum allotment sizes will impact traffic volumes in the area. This is likely to trigger major upgrades to the road network, beyond simple 2 coat bituminisation of local roads. To cater for increased traffic volumes and manage any associated traffic impact, additional road infrastructure will likely be required.

This would include some key intersections provided with improved lighting and traffic treatments including roundabouts and traffic lights. Full reconstruction of some roads could be likely expected. The cost of upgrading this infrastructure to facilitate any residential intensification would need to be further considered and is beyond the scope of this discussion paper.

With respect to rail infrastructure, the Adelaide Gawler passenger rail line runs through the middle of Kudla. It provides the opportunity for residential intensification both around the Kudla and Tambelin Stations. The development of an "urban village" in Kudla and on currently vacant lan around Tabelin Station would increase the amenity of these areas and a deeccess to a wider range of employment opportunities for residents, agure 15).

However, until the new Greater Adelaid Regional Plan is released it might by preferable to apply a deferred us an designation over this transit corridor. Delivering infill housing at Tambelin station should be a priority before Kudla station.

5.4 Summary of infrastructure

The SRA is well serviced with key infrastructure available at its fringes. Electricity and mains water traverse the area. Recycled water is available from Bolivar and a major electricity substation i just south of Kudla on Dalkeith Road.

While the broader remsion of services could be a major cost, much of the infrastruct rembed be delivered is generally undertaken by the developer. It is not envisaged that infrastructure provision would impede a wide range of land use options in the area. Updated capital works priorities from SA Water in late 2023 will assist significantly in highlighting any major infrastructure upgrades needed within the growth corridor, including the SRA.

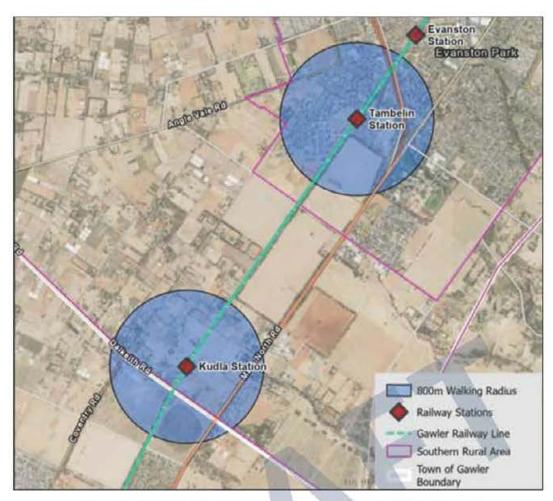


Figure 15. Train Stations in Southern Gawler (Source; Town of Gawler)

Both the Arris Report 022 nd the RD Hillier and Kudla Economic Report (202 a identified water a majo tor in the ongoing viability of horticulture and agriculture in the area he key is what vision is wanted for the area and the infrastructure can be provide. For instance, if Hillier is to have an agricultural and hor icultural future hen more detailed investigations will be required to procure quality and affordable water with Council having a more visible advocacy and suppor le with interested local landowners.

One of the most undervalued assets in the Rural Zone is the Adelaide Gawler rail line. It provides the opportunity for residential intensification both around the Kudla Station and Tambelin Station. The Greater Adelaide Regional Plan (2023) has also acknowledged the potential to leverage the rail station at Kudla. This is highlighted on page 7 of this Discussion Paper.

The Kudla Affected Area is well provided with infrastructure including both roads, rail, and electricity. However, the area lacks bitumen and gutters on most side roads. Urban development on the edge of the area can provide stormwater for a proposed Southern Sporting Precinct and horticultural activities in Hillier and parts of Kudla.

Character and Vision Development

6.1 One possible vision?

The current challenge is that the SRA is currently neither fully rural living, residential nor agricultural in nature. There are pockets of open space, agricultural land, commercial uses, industrial uses, and rural living. The complexity of the area makes the development of a single vision difficult.

Jensen in its Policy Recommendations Report (2015B) sought to offer a draft vision for the area based on three principles outlined below:

- The desire to retain views of open rural character that can be seen. from main entrances into Gawler
- To reflect community aspiration for improved amenity around Kudla
- To provide opportunities for **future produ wity**.

The above draft vision has some broad merit but also some limitations. Productivity in the form of agriculture should be a priority for instance. But as per the analysis contained in section 4 of this report, the open rural character is problematic given the location of the SRA relative to existing urban development. There are communities within the SRA and clearly evident precincts.

An overar ...ing vision that leads to precinct spr ific vision statements is likely to be a more productive exercise, potentially expressed as follows:



The Study Area functions as a green gateway between the town of Gawler and metropolitan Adelaide. Carefully considered zones enable orderly new growth but also agricultural enterprises to flourish. Densities of development married to strong landscaping treatments provide a managed visual transition into Gawler from the more intensively developed south.



This gateway will be experienced by:

- **Extensive canopy tree planting** forming a boulevard style entry along Main North Road from the City of Playford (the main point of access into Gawler).
- Generously setback and discrete nodes of commercial/ employment uses upon Main North Road that reinforce a strongly landscaped viewline into Gawler and Evanston South but also drive local employment opportunities.
- Efficient use of land around Kudla train station that brings housing diversity and innovation to where infrastructure and connectivity is best provided.
- Orderly residential development supported by full infrastructure provides high amenity living on larger land parcels centred on Main North Road.
- Strategic planning and investment in both open space reserves, footways and biolinks along Gawler Rive to Karbeethan Reserve and the proposed Southern Sports Precinct that balance the needs for active recreation and biodiversity corridors and a greenbelt to enhance Ga ar's identity.
- A flourishing horticulture sector that takes advantage of soil conditions and proximity to nearby water schemes at ng the margins of the Gawler River to build on the existing food and rural product cluster.

To progress the engagement the current and potential character of each precinct will be analysed based on existing character, opportunities and constraints and other relevant factors. A set of fact sheets on each of the five precincts will be separate v precided of part of the exhibition material.

6.2 Precinct Fact Sheet

Refer to Appendix B

7

Involving Our Community

7.1 Recap

A managed growth approach is the most prudent and logical means of planning for the future of the SRA. Taken as a whole, it is not feasible that all land will remain as a Rural zone. In equal measure, it cannot be confidently stated that the SRA can be retained as a combined Rural/Open Space landscape due to the costs associated with land acquisition. The recent shift in the State Government position on Kudla to be the beginning of a Growth Investigation Area will maximise the use of local infrastructure particularly road, rail and other supporting trunk services.

This however is not to suggest that the SRA should be treated entirely as urban land in waiting either. Council's Community Plan 2030+, other strategies and the land capability and businesses already in Hillier and across the Sareasonably foreshadow that a range of land use objectives should be soaght.

A managed growth approach addresses the follo g expectations:

- Alignment with State and Re _.onal Planning Directions is expected – any other approach is likely to meet substantial obstacles with respect to code amendments under the Planning Development and Infrastructure Act 2016.
- Zones are fit for purpose heavily fragmented land such as in the Kudla Affected Area has no logical capacity for rural activity or zoning. Likewise established commercial and industrial land on Main North Road will need to be zoned appropriately and providing greater policy direction on future development.
- **Yey landown expectations is properly considered** RenewalSA held land will be assumed to be developed largely for housing or urban development as per their mission statement.
- Agricultural businesses expect certainty that they will not be built out by surrounding new housing.
- Realistic expectations are needed rural zones are places of production. Technology and economic considerations dictate the manner of production – not planning schemes or aspirations for open country and wide expansive landscapes devoid of buildings.

- Well considered community needs. The new GARP consideration of a Green Urban Break opens the opportunity to provide for community needs such a play spaces and sporting grounds to meet population growth.
- A greenbelt and a gateway experience into Gawler from the south on Main North Road. This is and will be the main point of access into Gawler from the City of Playford

7.2 Managed growth – a precinct approach

This Discussion Paper has examined key aspects of land use, local and State planning issues, as well as other policy matters relevant to the future of the Southern Rural Area. From this work, five planning precincts have been identified as separate areas each with distinct characteristics. Whilst many of these same issues have previously been discussed in the earlier work by Jensen (2015A & B), commissioned by Council. The Technical Paper exten sthi, further and reflects a range of relevant factors either not covered in the earlier brief or are emerging issues.

In Hillier **(Precinct 1)** the preferred outcom ... the continuation of the existir. Rural Zoning with a focus on horticulture, to support the \$13 million local horticulture industry. Ongoing agmentation should be resisted and new homes for lifestyle housing anould not be encouraged. The all it is a soils, the existing industry present in the area, proximity to recycled water schemes drive the future of Hilli r. Flood liability and the need to preserve agricultural land are pre-eminent objectives for this area.

In Kudla (**Precinct 2**), the Kudla Aff cted Area has created a fragmented landscape that has largely made future agriculture problematic to deliver. The future of this area will be residential based due to existing infrastructure on the edge of the area are and rail infrastructure including Kudla Station being at the centre of the precinct. Whilst infrastructure costs will significantly inform the densities of settlement in Kudla. Accessibility to the Kudla Station and the Gawler-Adelaide line give this state significant infrastructure a competitive advantage for Kudla. Around Kudla train station (800m radius) this future is likely to centre upon achieving housing diversity, and is supported by the Greater Adelaide Regional Plan 2023. Consideration should be given to a visual separation of the area from the master planned estates of Playford Alive.

Evanston South **(Precinct 3)** has elements of a potential greenbelt following Main North Road that needs to be carefully master planned. Elements exist at the edge of Gawler and within the City of Playford, this extends into the cemetery at Smithfield Memorial Park and the parkland treatment on the western edge of Aspire and Trinity College. These links should be strengthened and planned to be a coherent corridor and a greenbelt, creating well serviced greener suburbs while supporting jobs, sporting facilities, and businesses.

Careful consideration of how to plan for the consolidation and reinvestment within existing business clusters to strengthen, not further erode the visual gateway into Gawler is critical. New development will be setback more strongly from Main North Road but with zoning certainty as to future planning in this area. Careful master planning of this precinct will enable the development of a green urban break or a greenbelt.

For the Gawler Foothills (**Precinct 4**) there is no fundamental need f r change. There are landscape and other considerations however that might warrant stronger amenity protections.

Finally, along Gawler River (**Precinct 5**) there is both an asset to better manage and an opportunity to leverage. In a network sense, the Gawler River provides significant opportunities for pedestrian movement consistent with corporate branding and community aspirations. The Gawler River has four key attributes worth building on:

- First Nations story telling as a hunting ground similar to the story telling visible at Julian Terrace, Gawler for the Kaurna people.
- Biolink and habitat corridor linked to river red gums woodland.
- Water access and floodplain for water harvesting and environmental flows.
- Pedestrian trail network opportunity to create an integrated trail net w k consistent with existing opportunities and branding of Gawler as a place defined by landscape.

A renewed focus on Gawler River as an environmental asset can showcase the biodiversity still within Gawler and our role as a community leader in conservation.



Community Engagement and Project Initiation

8.1 Broad approach

Given the large extent of the Southern Rural Areas, its diverse mix of land uses, and the likely difference of views of stakeholders about its future, it is proposed to develop a detailed engagement plan based on a precinct engagement model.

The engagement plan would consist of identifying all relevant stakeholders by precinct and seek to consult with directly impacted landowners and the wider community. The engagement plan would comply with the Community Engagement Charter under the Planning Development and Infrastructure Act 2016.

The engagement plan will seek to provide confidence that a full and informed conversation with the communities throughout the current and Zone occurs and that direct input into the shape of the code amendment.

8.2 Staging of investigat as

An engagement plan will be developed to guide how the community will be informed and consulted on planning changes to the Rural Zon. This Discussion Paper can be used to consult the community as a first step in the development of a series of code amendments for the Rural Zone.

The Dis o per for the Southern Rural Areas will assist with the broader Region Planning ocess to be undertaken by the State Government. The following aging of vestigations is proposed in Figure 16 with indicative timing:

OCT 2023	FEB-MAR 202 1	APR 2024	MAY 2024	JUN-DEC 2024	FEB 2025	APR 2025*	MID 2026
Discussion & Tech Paper & support docs tabled for purposes of stakeholder engagement	Engagement process (drop in sessions x 5, social media etc)	SRA Discussion Paper and Technical Paper adopted	RI Q for Code Amendment Pre-Initiation phase	Pre-initiation documentation and engagement phase	Landowner agrement to funding model principles and LMA/other	Initiation of Code Amendments	Aim to complete initial code amendments

Figure 16. Staging of Investigations and engagement for Rural Zone Code Amendment

^{*} Conditional on funding in 2024/25 for project consultant/s

References

- Arris (2022): Land capability Assessment Gawler Rural Zone, prepared for Town of Gawler, December, unpublished.
- Australian Water Environments (2017) Gawler River 2016 Flood Review, prepared for GRFMA, accessed 8 May 2023 from www.gawler.sa.gov. au/_data/assets/pdf_file/0025/219724/05-10-2017-gawler-river-flood-review-report-final-2016-gawler-river-floodplain-management-board.pdf
- Department of Planning Transport and Infrastructure, 30 Year Plan for Greater Adelaide, Government of South Australia, 2017
- Greening Australia, Biodiversity Management Plan, Town of Gawler, 2019
- Healthy Environs, Environmental Management Plan, Town of Gawler, 2016
- Infraplan (2018): Town of Gawler *Walking and Cycling Plan 2* 3-2028, ugust, accessed 15 May 2023 from www.gawler.sa.gov.au/your-voice/old-consultations/9676/draft-walking-and-cycling-plan-2018-2028
- Jensen Planning + Design (2015A): Gawler Rural Land Use and Infrastructure Investigation, Report No.1 Background Paper, prepared for Town f Gawler, accessed 8 May 2023 from www.gawler.sa.gov.au/__data/assets/pdf_file/0034/219877/cr15-37884-rural-land-use-and-infrastructure-investigati .-report-1-back nd-paper-endor ed-for-consultation.pdf
- Jensen Planning + Design (2015B): Gawler R¹ al Land Use and Infrastructure Investigation, Policy Recommendations, Report No.2, prepared for Town of Gawler, accessed R² ay 2023 from www.gawler.sa.gov. a V_data/assets/pdf fle/0031/219739/cr15-18487-rural-land-use-and-infrastructure-in estigation-report-2-policy-recommendations.pdf
- Planning Ad Tory Service, Southern Gawler Growth Options Study, Government of South Australia 1997
- Planning Advisory Service, *Southern Gawler Planning Issues, Discussion Paper,* Town of Gawler 2000
- Planning SA, *30 Year Plan for Greater Adelaide*, Government of South Australia, 2010
- RDA Barossa, Gawler, Light, and Adelaide Plains (2022), *Investigation of Farm Economics in Hillier and Kudla*, unpublished

State Planning Commission (2019): State Planning Policies for South Australia, 23 May accessed 31 May 2023 from State Planning Policies for South Australia – version 1.1 – 23 May 2019

Town of Gawler (1995): Gawler Strategic Plan

Town of Gawler (2008): Southern Rural Gawler Development Framework

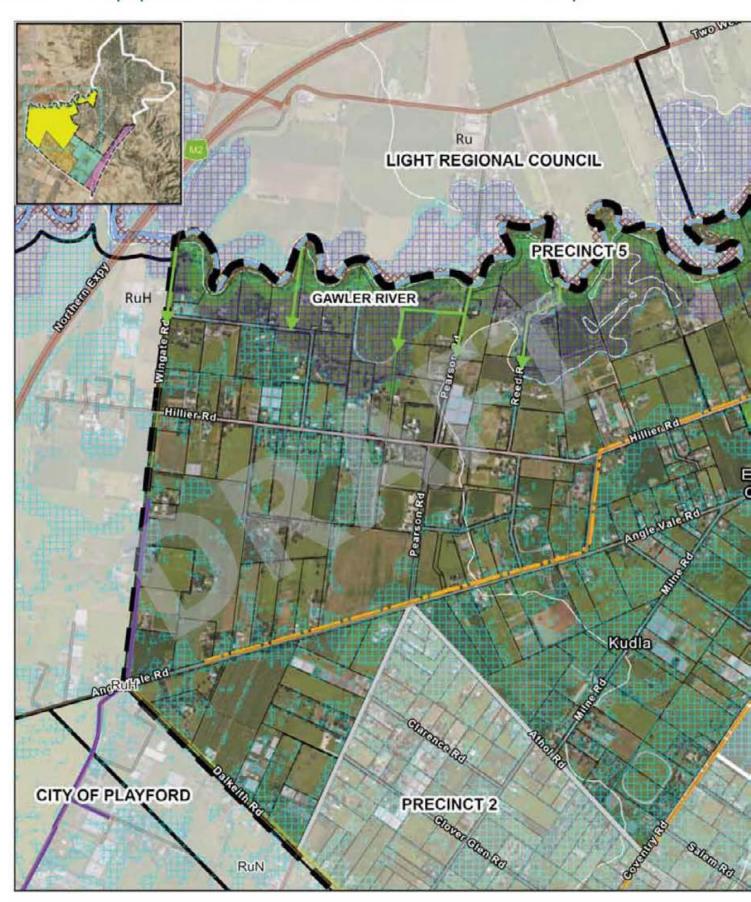
Town of Gawler (2020): Town of Gawler, Gawler Community Plan 2030+,

Town of Gawler (2020): Economic Development Strategy, unpublished, August, accessed 9 May 2023 from www.gawler.sa.gov.au/__data/assets/pdf_file/0021/820272/Economic-Development-Strategy.pdf#:~:text=Town%20 of%20Gawler%20was%20successful%20in%20obtaining%20 funding,expectation%20that%20the%20Strategy%20document%20 would%20be%20completed

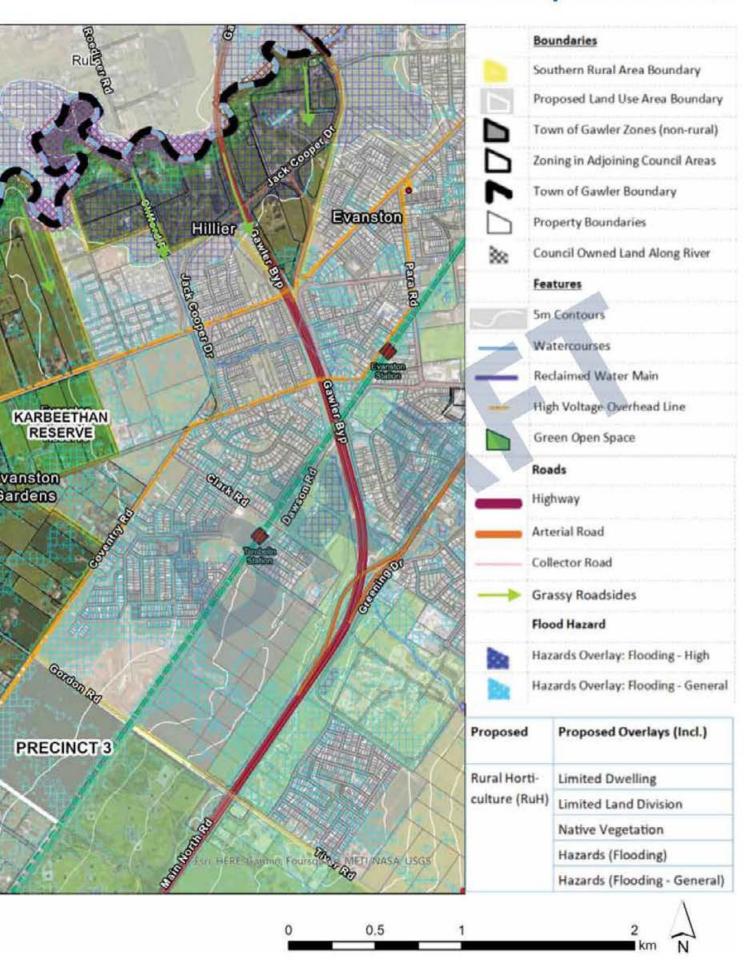
Town of Gawler, *Open Space, Sport and Recreation Plan*, Town of Gawler, 2015–2025

Town of Gawler (2022), Climate Emergency Action Plan, 2022–2030

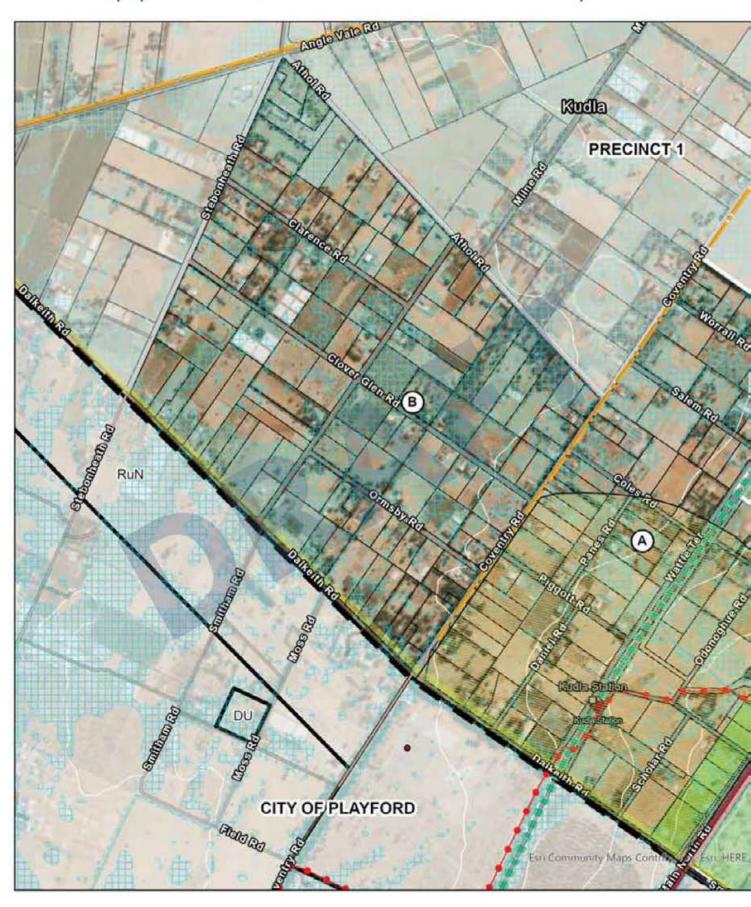
Appendix A1: Precinct 1 Map



Hillier and parts of Kudla



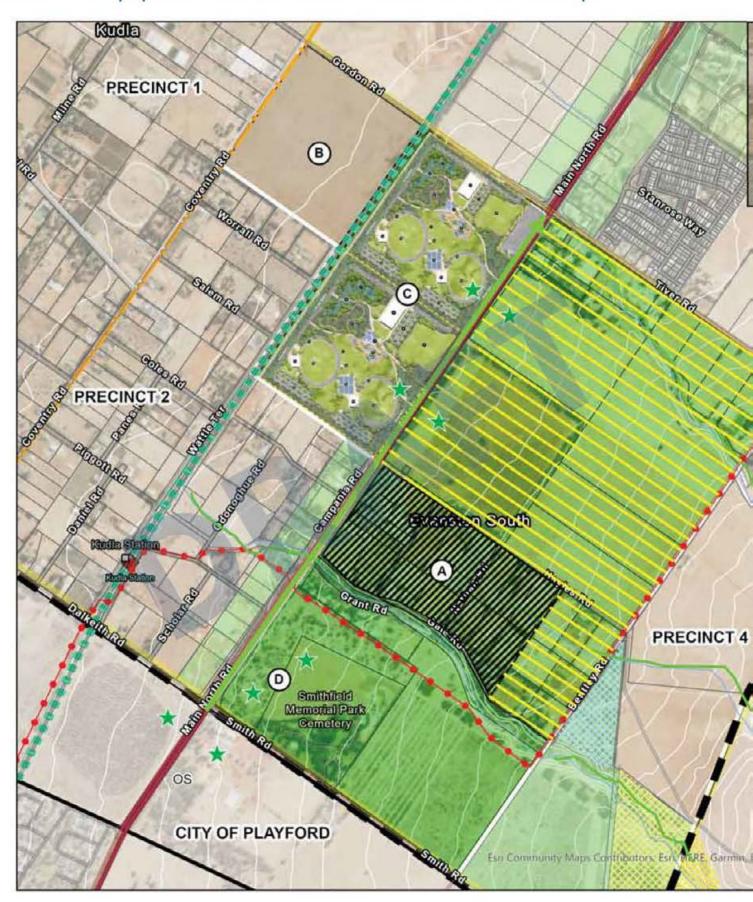
Appendix A2: Precinct 2 Map



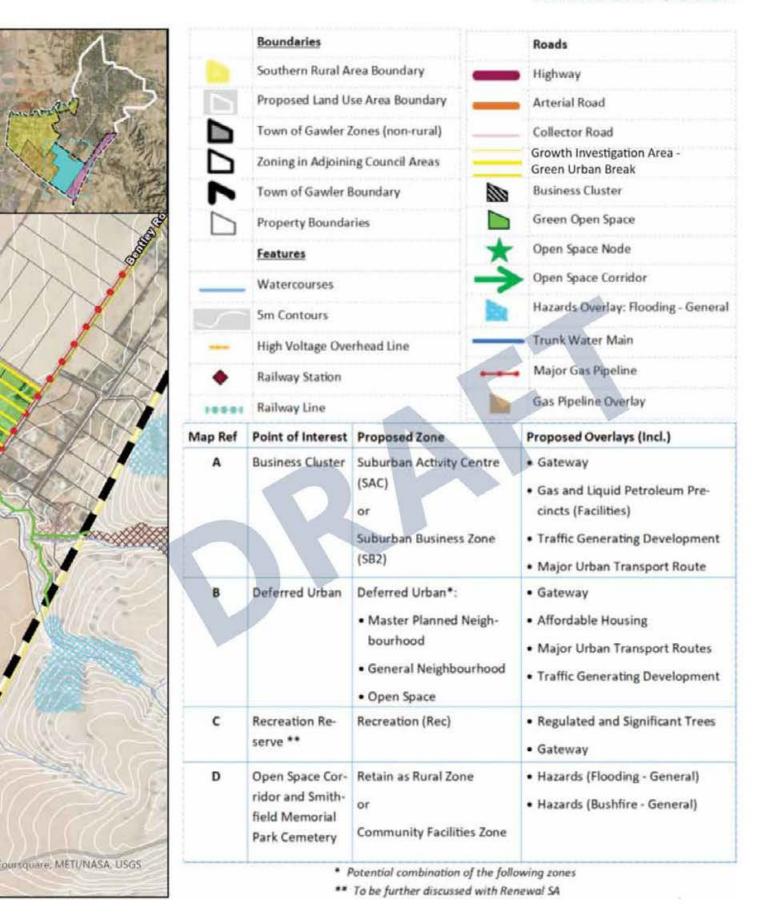
Kudla Affected Area



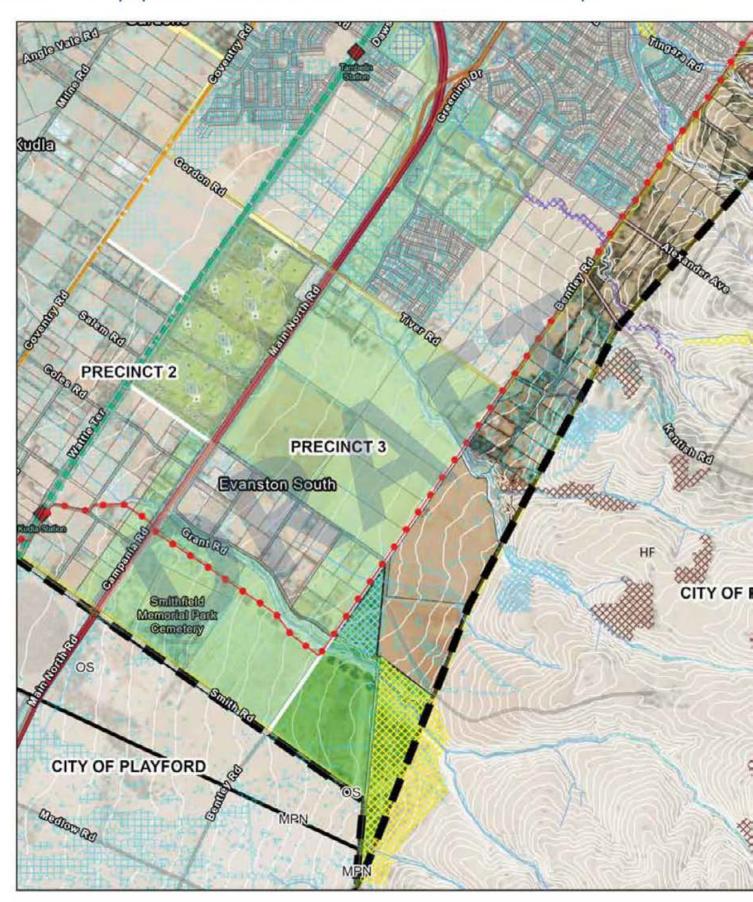
Appendix A3: Precinct 3 Map



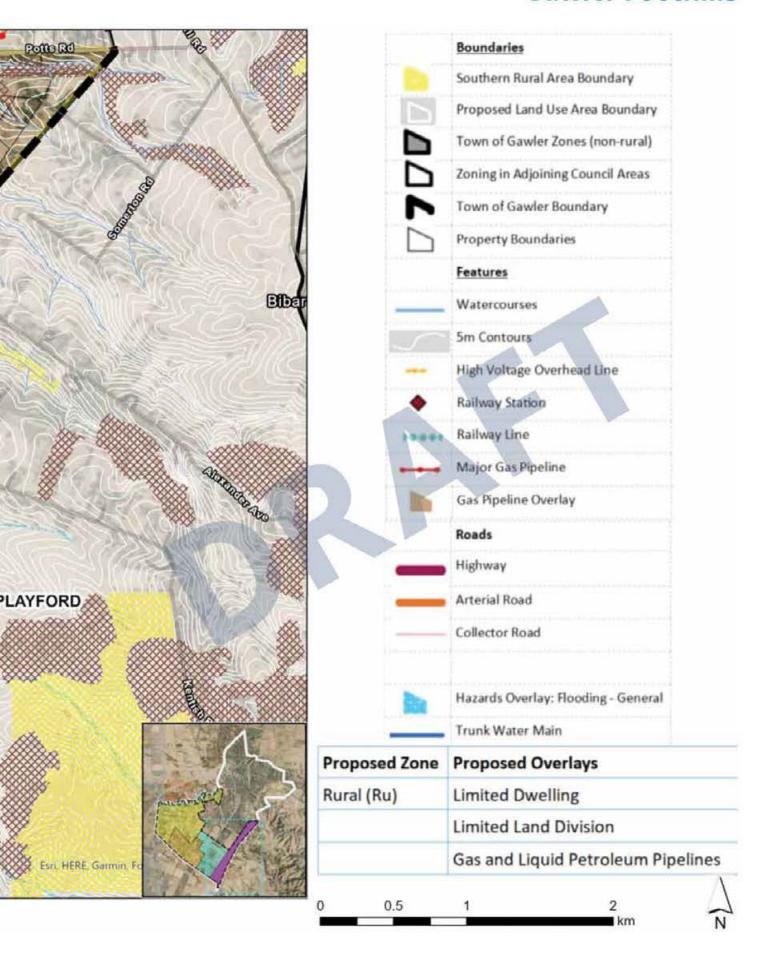
Evanston South



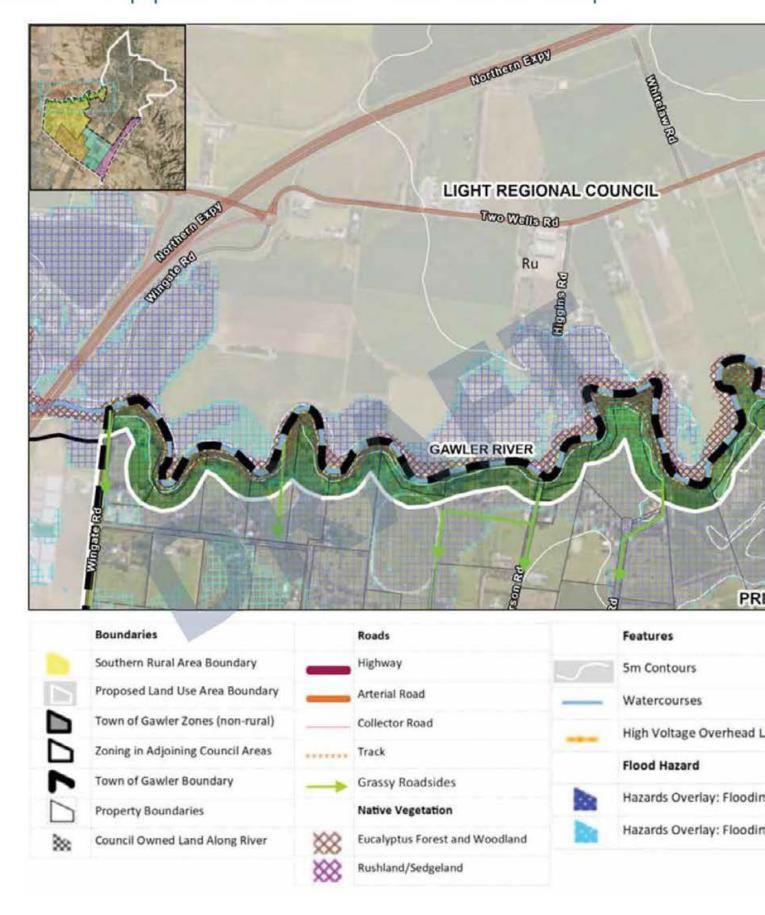
Appendix A4: Precinct 4 Map



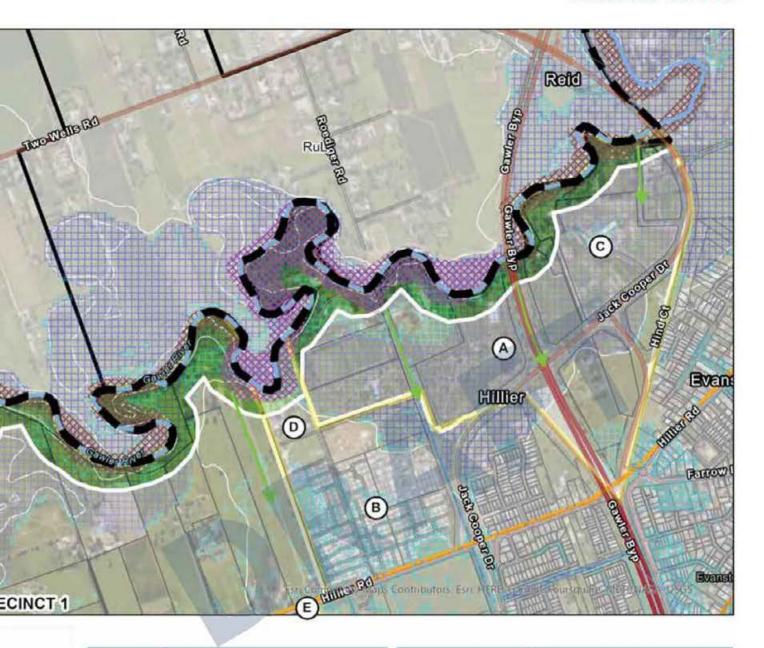
Gawler Foothills



Appendix A5: Precinct 5 Map



Gawler River



Map Ref	Point of Interest		
Α	Food Forest		
В	Hillier Park Residential Village		
С	Knights Roses		
D	Riverdell Spiritual Centre		
E	Karbeethan Reserve		

ine

g - High

g - General

Proposed Zone	Proposed Overlays (Incl.)	
Open Space (OS)	Hazards (Flooding General)	
	Prescribed Watercourses	
	Native Vegetation	
	Hazards (Flooding)	
	Water Resources	

0	0.33	0.65	1.3
			km



Appendix B: Precinct Fact Sheets



Hillier and parts of Kudla

Opportunities

The Northern Adelaide Plains Food Cluster (NAPFC) together with the Regional Development Australia (RDA), the Food Forest and others have scope to facilitate a local industry group to enhance and promote the region as a thriving food bowl.

The maintenance of the 4 hectare minimum lot size as well as a clear delineation of this area as an advanced horticultural zone, would help grow jobs in Gawler and encourage more investment.

The combination of large block sizes and use of the collective leverage of a food hub to drive investment in new connections to existing recycled waters schemes and other infrastructure is a distinct commercial advantage.

The addition of new water from urban areas, such as stormwater and wastewater harvesting would greatly contribute to the long-term, viability of this area.

Constraints

The Flood Hazard Overlay restricts land around Gawler River for urban development.

Land use anomalies

Vacant and underutilised farmland

Further Investigation needed on:

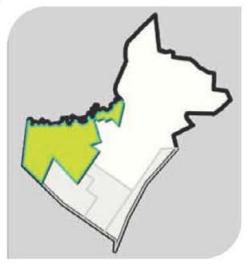
Collaboration with Regional Development Australia to support and promote horticultural businesses

Questions for the Future:

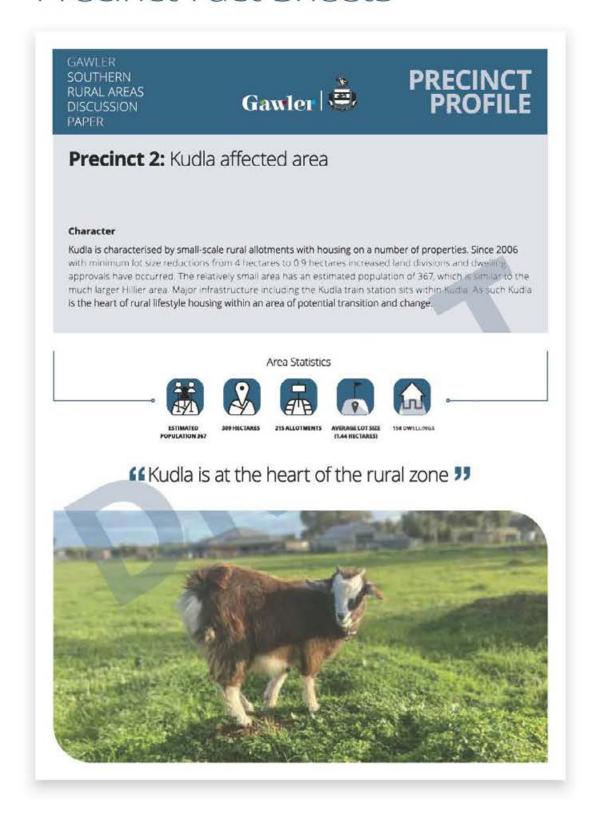
What do you see the future of Hillier and rural parts of Kudla to be? Are you seeking to expand your rural business? What factors would encourage you to invest further in your property?

Contact:

Chris Hannaford, Senior Strategic Planner Tel: 8522 9279 Email: chris.hannaford@gawler.sa.gov.au



Appendix B: Precinct Fact Sheets



Kudla Affected Area

Opportunities

The Kudla Station is the most underutilised asset in the Rural Zone. Based around the Train Station a two-pronged approach is possible:

- Urban Village for areas within 800m distance of the Kudla Train Station.
- Master planned development within Kudla for areas not within walking distance of Kudla Train Station.

The area should provide for well-designed low to density housing that benefits from its proximity to the station as a component of a transit hub. The emphasis would be on housing diversity and accessibility to jobs and educational opportunities along the transit corridor.

Outside of walking distance to Kudla Station there is a vision to develop well planned housing with convenient access to a range of services and amenities.

A master plan could be put in place to assist with co-ordinating road upgrades, drainage, tree planting and a density of development that is consistent with master planned developments in Gawler.

Constraints

Small block sizes in this part of Kudla make it difficult for to expand horticulture. While further rural living development is not encouraged.

Land use anomalies

The Kudla Affected Area can be characterised as a rural living area in a Rural Zone. This rural living anomaly could be maintained. Nevertheless, the smaller lots sizes are fairly consistent across the area and may provide the opportunity to develop a template for further residential development by individual land owners. The 309 hectares in the area enables a wide variety of densities to be developed in Kudla.

Further investigations needed on:

- · Ensure preservation of lot sizes along Main North Road to maintain a buffer and entrance statement for Gawler.
- Examine impacts of the Smith Creek Flood Plain on the potential for further residential intensification.
- Consider the opportunity for a Master Plan over Kudla that maximised water reuse and open space opportunities, while developing a cohesive urban form.
- · Investigate an urban village around the Station.
- Investigate the most suitable residential zone for the area 800m beyond the Kudla Station.

Questions for the Future:

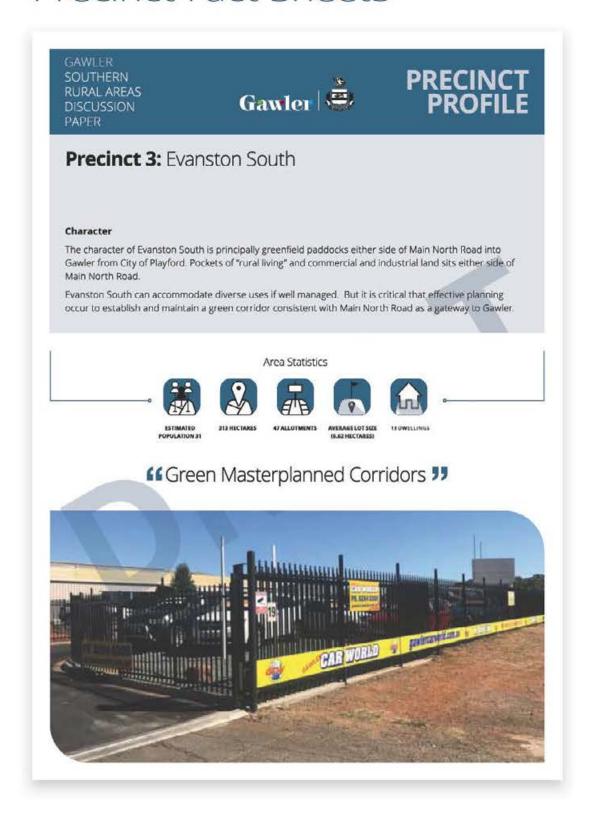
- What do you see the future of Kudla to be?
- What level of amenity do you see in a future Kudla e.g. parks, trees and playgrounds?

Contact:

Chris Hannaford, Senior Strategic Planner Tel: 8522 9279 Email: chris.hannaford@gawler.sa.gov.au



Appendix B: Precinct Fact Sheets



Evanston South

Opportunities

The larger allotments present an opportunity to provide for growth and core elements of a green corridor. There is a demand for a regional wide sporting precinct to accommodate the growing Northern Adelaide and Gawler community. Resolution of the size and nature of the green belt is essential.

A green corridor would be anchored by three substantial green spaces; Karbeethan Reserve; a new Southern Sports Precinct and Department of Environment land on Gawler's southern boundary. This green corridor would be reinforced by an additional tree lined corridor along Main North Road.

Development of a masterplan to provide a gateway to Gawler with interlinked green corridors is central to the future of this precinct including creek and drainage lines and areas of remanent native vegetation and significant trees.

Orderly management of existing commercial and industrial development towards an emphasis on local scale employment and meeting community needs is a priority. The existing clusters of commercial and industrial development with appropriate zoning and land management agreements can be better managed to provide investor certainty, active greening and enhanced local amenity.

Constraints

The commercial and industrial clusters along Main North Road reduce the potential to create a green corridor.

Land use anomalies

Two commercial precincts: Commercial area South of Tiver Road, commercial area South of Hayles Road.

Further investigations needed on:

The Evanston South area can accommodate a wide range of uses. However, the key would be to provide a green corridor or green belt to Gawler while linking sporting to residential development opportunities.

Development of a Master Plan to ensure well designed entrance statement to Gawler. The size and nature of the green belt will depend on demand for sporting facilities.

Questions for the Future:

What do you see the future of Evanston South to be:

- · Residential
- · Commercial
- · Greenbelt / northern parklands
- · Small rural living clusters?

Do you support the development of a Master Plan for Evanston South to provide wide range of uses with an emphasis on preserving views and seperation from Metro Adelaide.

Contact:

Chris Hannaford, Senior Strategic Planner Tel: 8522 9279 Email: chris.hannaford@gawler.sa.gov.au



Appendix B: Precinct Fact Sheets



Gawler Foothills

Opportunities

The area is essentially part of the Adelaide foothills with excellent views from the plains.

Ongoing rural activity is envisaged as the future of this precinct.

The scenic nature of the area enables it to act as anchor for walking trails in the southern area of

Gawler. The Department of Environment and Water property in the southern part of Town of Gawler has been revegetated and provides habitat for local wildlife. In particular, links can be made to the Southern Sporting Precinct and up to Karbeethan Reserve.

Constraints

The slope and rural living nature of the area makes the development of a master planned community and higher density development difficult.

Land use anomalies

The area is well suited to being identified as an area of special landscape character.

Council has placed a request with the SA Local Government Boundaries Commission to realign this boundary. It is proposed that the suburbs of Uleybury and Bibaringa are given to City of Playford. While Council is seeking additional parts of Evanston Park.

Further investigations needed on:

The open character of the land and its position adjacent to the Hills Face Zone can lead to consideration as a character area.

That detailed investigation is undertaken to develop a greenbelt linking Karbeethan Reserve to a Southern Sporting Precinct and anchored by Department of Environment and Water property in the southern extremity of the Council.

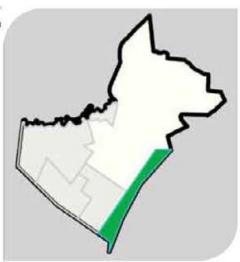
Questions for the Future:

What do you see the future of the Gawler Foothills to be? Are you seeking to expand your rural business or are you seeking rural living?

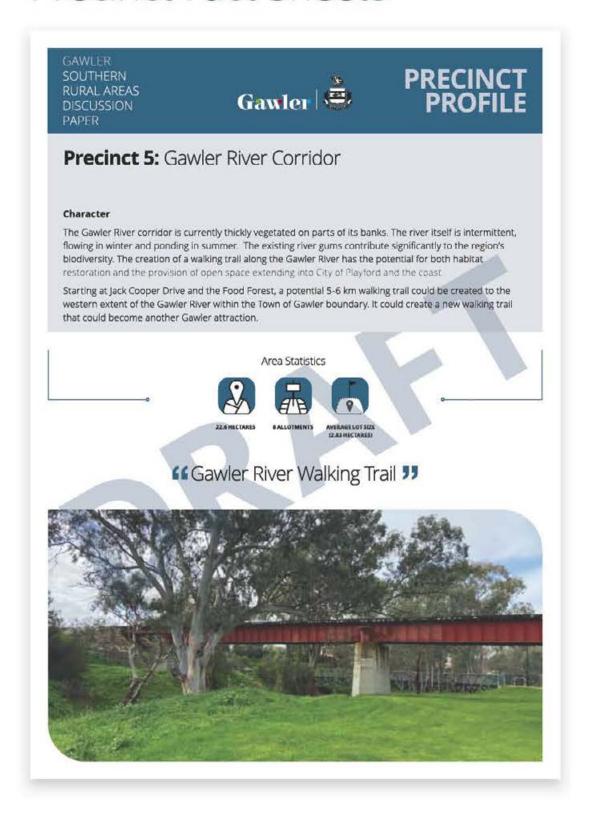
What factors would encourage you to invest further in your property?

Contact:

Chris Hannaford, Senior Strategic Planner Tel: 8522 9279 Email: chris.hannaford@gawler.sa.gov.au



Appendix B: Precinct Fact Sheets



Gawler River

Opportunities

Approximately 3 km of the potential walking trail is in Council's ownership or control. The River Corridor walking trail could be created by linking Council owned land with private owners to provide public access.

A corridor of up to 100m wide on the southern side of the centreline of the river has been mapped.

The walking trail could sit within an open space linear park bounded by useable open space and a bushfire protection area.

Developing the river corridor can provide the opportunity for a hills to sea linear park that would be important to communities in Northern Adelaide.

Constraints

Given that the corridor is in the flood plain, the area holds limited development potential and is primarily suitable for recreation and native species protection. However, securing and maintaining the entire corridor may prove costly.

Land use anomalies

A range of mechanisms including Land Management Agreement's are currently in place over parts of the potential trail.

Further investigations needed on:

- · Investigate the cost of creating and maintaining a walking trail
- · Investigate preferred legal mechanisms to create and secure the trail in conjunction with existing landowners
- · Revisit the recommendations and actions to enhance the Gawler River as a habitat corridor/biolink
- The Gawler Open Space Sport and Recreation Plan (2016) Recommends: Investigate acquiring land along the rivers to strengthen linear corridors and achieve key parks.

Questions for the Future:

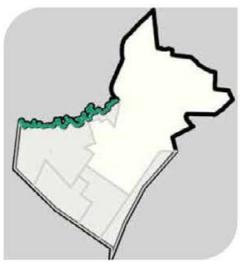
What do you see the future of The Gawler River Corridor to be? Do you do support the development of a Walking Trail? What kind of public access do you envisage?

Contact:

Chris Hannaford, Senior Strategic Planner Tel: 8522 9279 Email: chris.hannaford@gawler.sa.gov.au



Rakali Gawler River, Photo Courtesy of Martin Smith, Hillier.











TOWN OF GAWLER

43 High Street, Gawler East SA 5118 PO Box 130, Gawler SA 5118 Tel: 08 8522 9211

council@gawler.sa.gov.au gawler.sa.gov.au



DTI:PlanSA Submissions

From: Anthony Marroncelli

Sent: Tuesday, 31 October 2023 1:04 PM

To: DTI:PlanSA Submissions

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper - City of Holdfast Bay

Attachments: Submission – Greater Adelaide Regional Plan Discussion Paper - City of Holdfast Bay.pdf

You don't often get email from

Learn why this is important

Dear Sir/Madam,

Please find attached the City of Holdfast Bay Council's Submission in response to the Greater Adelaide Regional Plan Discussion Paper.

Please contact me should there be any queries.

Regards,



ANTHONY MARRONCELLI

Manager Development Services City of Holdfast Bay



holdfast.sa.gov.au



Brighton Civic Centre

24 Jetty Road, Brighton SA 5048







I acknowledge the traditional custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and emerging. The City of Holdfast Bay sits proudly on Kaurna land and we respect the continual cultural connection, heritage and beliefs that remain important to Kaurna people today.

The City of Holdfast Bay advises that, in order to comply with its obligations under the State Records Act 1997 and the Freedom of Information Act 1991, email messages may be monitored and/or accessed by Council staff and (in limited circumstances) third parties. The contents of this email are confidential and may be subject to copyright. This email is intended only for the addressec(s). If you have received this email in error please immediately advise the sender by return email and delete the message from your system. Use, disclosure or reproduction of this email by anyone other than the intended recipient(s) is strictly prohibited. No representation is made that the email is free of viruses or other defects. Virus scanning is recommended and is the responsibility of the recipient. All references to 'email' include references to attachments to the email. If you believe that you have been spammed please email mail@holdfast.sa.gov.au to report your complaint. If you have received this email by being on a subscription list and you wish to be removed, please forward this email to mail@holdfast.sa.gov.au. You will be removed within 5 working days



27 October 2023

Mr Craig Holden
Chair, State Planning Commission
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

Dear Mr Holden

Greater Adelaide Regional Plan - Discussion Paper - City of Holdfast Bay Submission

Thank you for the opportunity to provide comments on the Greater Adelaide Regional Plan Discussion Paper. The City of Holdfast Bay appreciates that the State Government's ambitious population and housing growth projections announced in the Discussion Paper require the support of each council within the Greater Adelaide Region if these targets are to be met. It is important to note, however, that the geography and established character of some local government areas requires a sensitive and planned approach to growth. This submission therefore seeks to provide a balance between our council's obligations to accommodate additional housing, whilst setting parameters around protecting and enhancing the lifestyle and built form attributes that are important to the Holdfast Bay community.

As the State Government is aware, the City of Holdfast Bay has done more than most to accommodate population increases through successive Ministerial changes to land use policies since 2014 that have increased densities and building heights throughout the council area. These have included: the Brighton and Hove District Centre DPA that increased residential densities and building heights to five storeys along Brighton Road; the Minda North Brighton Campus DPA that facilitated high-rise apartment accommodation to nine storeys on the Minda site; and the Glenelg High Density DPA that enabled up to 12 storey accommodation along Adelphi Terrace, Jetty Road, Colley Terrace and South Esplanade.

The majority of council's residential zones too have been unlocked for infill development in that time through the introduction of the Planning and Design Code, where allotment sizes and frontages have created increased opportunity for intensification. Indeed, where prior to 2021 20 per cent of conventional residential allotments could be subdivided in Holdfast Bay, that figure is now 75 per cent. As a counter measure, the council took the first step to securing its built heritage future in 2021 through the Heritage Transition DPA, where 27 historic properties were protected through their inclusion on the Local Heritage register. Council is exploring further opportunities to formally recognise its inter-war heritage through the current Art Deco review. Past submissions to the State Government and successive representations made to the State Planning commission in response to

the various planning reform agendas have also stemmed the erosion of character areas previously planned for Holdfast Bay.

Notwithstanding past and current efforts, the council acknowledges that there is more to be done in light of the State Government's target for an additional 670,000 residents by 2051, and that all metropolitan councils need to adopt a proactive approach to ensure that new development is compatible with its surrounds, directed to areas that can best accommodate growth, and supported by the necessary infrastructure. Whilst councils no longer set the policy framework for the types of development that can happen in different areas since the replacement of individual council Development Plans with the singular Planning and Design Code, our council remains a key stakeholder in ensuring that the State Government makes informed decisions on growth in its area. The City of Holdfast Bay is keen to play its part in expanding housing choice and diversity to meet the needs of different types of households, in a way that leads to well designed housing, improved infrastructure, better services, and a more liveable and sustainable city.

The council is aware through engagement with its community that its residents value the lifestyle that Holdfast Bay provides, including access to the beach and foreshore, the village feel of the Brighton and Glenelg Jetty Road precincts, and the charm and variety of housing in the city's character areas. The council also understands residents' concerns about the loss of back yards, green space, the effect of high-rise buildings, and the potential impact of development in historic and character areas. As such, residential growth needs to be balanced with heritage protection, and high-quality public spaces and services to create a welcoming, safe and active community where residents, visitors, and business can thrive.

Uptake of existing higher density opportunities, particularly along Jetty Road at Glenelg, has been slow, without necessarily addressing the shortage and lack of diversity in housing, with many new high-rise buildings offering short-term accommodation options instead of the longer-term housing designed to accommodate permanent residents of the city. As such, before earmarking additional tracts of land for high density development, there is a need to further exhaust existing supply to ensure orderly development occurs that is commensurate with the provision of infrastructure and social services. In addition, there needs to be a re-think of the design policies that underpin the high-rise development to ensure that the remaining opportunities do not repeat the design flaws seen to date with already completed developments, particularly at the interface with established neighbourhoods.

In responding to the Discussion Paper, the City of Holdfast Bay proposes four growth objectives that establish a framework for development that is compatible with the existing nature of our suburbs.

Objective 1: To protect/maintain and improve the character and heritage of the City

Objective 2: To encourage an increase in housing supply and diversity in suitable locations

Objective 3: To direct housing growth to locations which can accommodate change

Objective 4: To build environmental resilience and reduced carbon footprint in the pursuit of urban growth

Objective 1: To protect/maintain and improve the character and heritage of the City

Each suburb in Holdfast Bay has a unique character, with several areas enjoying heritage protection. This growth objective proposes to maintain the integrity and character of our neighbourhoods. In addition, the growth objective proposes to protect the larger allotments of some areas of low density to ensure housing is available to meet community needs through the various stages of life. In particular, the areas in Brighton, South Brighton, and Seacliff Park. An increasing number of two parent families with children will want the option of backyards, and the environment will be supported by maintaining areas with deep soil to support large trees for shade and biodiversity. Growth strategies will need to identify innovative ways to add new homes in a way that does not compromise the character and lifestyle which residents of Holdfast Bay value.

Recommendation 1: Maintain and expand residential character areas.

As much as this exercise is designed to identify areas that can accommodate infill development in anticipation of projected population growth, it also provides our council with an opportunity to draw attention to areas of notable character that should be excluded from consideration as potential infill areas. This recommendation therefore seeks to reinforce the protection against inappropriate development (design and density) attributable to existing areas of character within the City of Holdfast Bay, whilst also seeking to expand the number of areas that have been identified as having a residential character worthy of protection from insensitive infill development.

Given the tight timeframes imposed by the State Government for this exercise and the detail of information sought, the exclusion areas proposed have primarily been based on the substantial work undertaken as part of council's past submissions, including feedback from its community. The nominations are based on areas of unique subdivision patterns and places where either pre-1940s dwellings are predominant or where a notable dwelling style is prevalent, gathered through desktop analysis and field work to document and verify the distinctive features and characteristics of areas proposed for protection. Following this investigation, a number of areas were identified where further infill should be avoided, or only contemplated with extreme care and prescriptive design guidance. Council's objective here is to advocate for the provision of appropriate policies within the State Government's Planning and Design Code to support limited change that is sympathetic to character values within the nominated areas. Details of each of the identified areas are provided in the following discussion, with a location reference provided in the map accompanying this submission. The City of Holdfast Bay understands that areas with an existing heritage overlay in the Planning and Design Code are quarantined from this exercise, so this submission does not specifically discuss the attributes of these areas, other than to identify them on the accompanying map as areas protected from further growth.

Glenelg and Glenelg North - Area 1

This Area is recognised for its consistent design themes and front setbacks. The Glenelg part of this Area contains some examples of buildings that were constructed in the earliest period of settlement in South Australia. There are also numerous Local Heritage items located within the Area, which reinforces the need for protection. While some infill development has occurred within the Area, and further contemporary development is anticipated, the predominant character is maintained by design controls relating to mass, composition, architectural detailing, materials and colours. Without these controls, the Area is vulnerable to non-complementary development that is not compatible with the predominant character, making this Area a strong candidate for protection from further growth.

Sandison Terrace - Area 2

This Area takes in a series of allotments that have a frontage to Sandison Terrace and McGlasson Avenue in Glenelg North. The Area is currently not located within a 'character' area in the Planning and Design Code. This Area is not particularly noted for its building stock, rather the consistency and uniformity of the allotment and frontage sizes that have remained relatively unchanged since the original subdivision in the late 1950s. This subdivision is representative of the high quality speculative residential development following the austerity of the post-war years, and therefore should not be fragmented with infill housing.

Glenelg East - Area 3

This Area has a strong concentration of pre-1940s dwellings and a large number of Tudor and Bungalow style housing. Allotment sizes vary throughout the Area, but the predominant size is in excess of 850 square metres. New development in the Area is required to complement and reinforce the established suburban character, which is one of rich architectural style, landscaped streets, and openness, and it is important that

these considerations continue to apply to the State Government's policy decisions for the Area. It is therefore strongly recommended that this Area is excluded from a future growth agenda.

Melton Street - Area 4

This Area forms the western pocket of Glenelg East and is bounded by Diagonal Road, Brighton Road and Melton Street. The Area is not currently protected as a 'character' area in the Planning and Design Code, and is therefore vulnerable to insensitive infill development. A site analysis revealed an extremely high proportion of pre-1940s housing within the Area with a variety of notable housing styles, including Bungalow, Tudor, Villa, and Art Deco, which contribute strongly to a pleasant built-form character that should be preserved and protected from fragmentation and growth.

Glenelg South - Area 5

This Area within Glenelg South is highly regarded as a location with a strong built-form character and a high amenity that contributes significantly to the quality of life of residents. This Area is currently located outside of a protection overlay area in the Planning and Design Code and is therefore susceptible to insensitive redevelopment. The identified Area displays numerous examples of pre-1940s housing stock, in particular Villas and Return Verandah Villas. Future development within this Area should not only seek to be compatible with the predominant design elements within the locality, but strong consideration should also be given to how development interrelates with the character of the adjacent streets located within the Historic Overlay. Unsympathetic development within the Area could undermine the heritage value of the broader Glenelg South precinct, so this Area should be excluded from an aggressive infill agenda.

Hove - Area 6

This Area, located in the south-western corner of Hove, accommodates a high proportion of pre-1940s housing, specifically along Colton Avenue, Murray Street and Townsend Street, and at the eastern end of Wattle Street. A tour of the area confirmed that the predominant built form character of the nominated Area is derived from well-maintained Bungalows, estimated to have been constructed in the 1920s. The Area also has relative uniformity of allotment sizes and front set-backs. It is therefore important that this Area is excluded from any growth agenda that would result in the loss of existing building character and scale.

Dunluce - Area 7

This Area, which is often referred to as the 'dress circle' of Brighton, is characterised by large allotments, wide frontages and above average sizes of private open space. The mature street trees on several streets also assist in distinguishing the Area as unique. The era of building stock within the Area predominantly ranges from 1916 to 1940, with several examples of dwellings from an earlier period. Bungalows represent the predominant building style but there are also many examples of Tudor and Return Verandah Villas. At present, the principles of development control for the Area require development compatibility in terms of mass, composition, architectural detailing, materials and colours. It is imperative that the design, density and scale requirements for this Area are not diluted or compromised by any growth agenda.

Brighton - Area 8

This Area, located west of Brighton Road from Jetty Road to Edwards Street, does not currently have any specific character controls beyond the requirements of the Zone. While this Area has experienced high levels of development in recent years, a significant proportion of pre-1940s dwellings remain, with a notable representation of Bungalows and Return Verandah Villas. Most contemporary development has successfully responded to the established character of the Area by incorporating compatible design elements such as hipped or gabled roof forms and use of complementary materials and finishes. Some developments,

however, have not been as successful in responding to the prevailing character since the introduction of the Planning and Design Code. Notwithstanding, further erosion of this Area's character and density should not occur, thereby requiring the Area to be excluded from future growth agenda to safeguard against an increase the number of unsympathetic residential developments, which will likely threaten the established character of the Area.

Seacliff - Area 9

This Area is characterised by a sloping landform overlaid with a rectilinear 19th century pattern of roads, resulting in smaller allotments, narrow streets, reduced setbacks, limited street trees and limited stormwater infrastructure. While recent development has varied in architectural style, the Area remains substantially intact, characterised by dwellings constructed in the 1880 to 1920 period west of the railway line, and dwellings from the 1930s to 1960s to the east of the railway line. There are also 13 Local Heritage items within the nominated Area. It is therefore considered that there are compelling reasons for this Area to be excluded from nomination as a growth area.

Kingston Park - Area 10

Topographical mapping of Kingston Park shows that this Area slopes by up to 20 degrees, creating some challenges for orderly infill to occur. The Area also accommodates some unique cultural and environmental elements that require a level of sensitivity that would be eroded should this Area succumb to an aggressive growth strategy. Furthermore, the original subdivision of Kingston Park has remained relatively unchanged despite a certain level of development over the years, and it is considered that the original 1920s subdivision pattern should be preserved.

Seacliff Park - Area 11

The Gilbertson Gully is a significant environmental and topographical feature of the nominated Area. This Area slopes by up to 20 degrees which can create challenging site conditions for development. The topography of this Area alone warrants exclusion from consideration as part of a growth agenda. A targeted approach to infill development to preserve neighbourhoods of major historic or cultural significance is required in this Area, adding further cause for its ongoing protection.

Objective 2: To encourage an increase in housing supply and diversity in suitable locations

This Objective proposes to increase the supply of housing through housing density and further diversification of housing types. The City of Holdfast Bay has a greater diversity of housing than many councils in metropolitan Adelaide. However, housing policy must encourage further diversity to support changing community needs, particularly for those that choose to remain in the city through various stages of life. Historically Greater Adelaide has been dominated by detached housing on large blocks of land and, at the other end of the spectrum, by multi-level apartment buildings. In this regard, there is a 'missing middle' of housing options. The 'missing middle' is a range of multi-unit or clustered housing types compatible in scale with traditional family homes. These housing types include, terraces, dual occupancies, multi dwelling and manor homes. Making provision for the 'missing middle' provides more affordable housing choices that cater for first home buyers, young families and downsizers. The adaption and conversion of larger character homes to accommodate multiple households can also meet the needs of a diverse range of people. This approach also provides an alternative to the obsession with high-rise apartments as the panacea for greater housing supply.

Recommendation 1: Encourage diversity of housing types of appropriate scale and design in appropriate areas

Council concurs with the Discussion Paper's aim to increase the 'missing middle' of housing types. It is proposed that policy changes are made to medium density and urban corridor zones to support this type of housing. Some of these housing types may be suitable in areas of larger allotments to accommodate additional households without dividing the allotment. Ultimately, however, there needs to be a review of current policies in the Planning and Design Code to encourage a greater range of housing forms in appropriate locations within the city. Simply imposing quotas on dwelling density without a design platform and a locational analysis will result in unsuitable housing in inappropriate areas. The map that accompanies this submission identifies the locations where growth could be accommodated through the provision of well-designed and environmentally efficient housing. The key message is that any intensification of urban density must be underpinned by good design, preservation of the amenity and character of adjacent land, and enhanced liveability for those who inhabit such accommodation. The City of Holdfast Bay nominates these 'growth opportunities' strictly on this proviso.

Objective 3: To direct housing growth to locations which can accommodate change

This policy objective proposes to direct increased density to locations within the City that can accommodate and support the growth. Specifically, growth areas need to be located where stormwater and road infrastructure, transport options, and social services are accessible to prevent new communities being isolated or local authorities requiring to make major upgrades to services.

Recommendation 1 - Locate mixed used development along the urban corridors

Mixed use development is important for the walkability and vibrancy of neighbourhoods, ensuring services and amenities are within walking distance for residents. It is proposed that mixed use and higher density developments be located along the key urban corridors of Anzac Highway and Brighton Road. Developments up to five storeys of high design standard can occur along these corridors where relevant interface criteria is also met, thereby protecting adjacent existing zones of low density and areas of character. Infill along major corridors, transport routes, and activity centres also helps to promote an urban form that encourages greater use of active transport options, such as walking, cycling and public transport. Growth in areas well serviced by active travel networks, including designated cycle ways, such as the Mike Turtur and Amy Gillett bikeways, should also be contemplated. In this regard, corridor development should be considered, depending on the sensitivity of adjacent land uses, in the following manner:

- Corridor development next to established residential land uses, particularly heritage and character areas will be of a lower scale and intensity to manage the interface with these neighbourhoods.
- Corridor development with fewer sensitive interface issues to manage will seek to maximise the scale and intensity of buildings and uses.
- Diverse housing should be encouraged in and around fixed line transport particularly Hove Railway Station and Brighton Railway Station.
- Diverse housing types should also be encouraged in the eastern portion of North Brighton given its
 proximity to Hove and Warradale Rail Stations, which are a reasonable walking distance to schools,
 shops and other day-to-day services.
- Designate additional areas for medium and high density residential development aligned to public transport, infrastructure and open space.
- Support the application of Urban Corridor zoning for Anzac Highway and Brighton Road (between Anzac Highway and Shoreham Road).

- Consider wider application of well-designed, medium-density housing options around the Adelaide-Seaford railway line in Hove, Brighton (including areas east of Brighton Road and north of Sturt Road) and South Brighton (west of Brighton Road).
- Consider strategic growth areas such as the Minda site and the Somerton Park aged care precinct for further intensification and/or renewal to continue as desirable locations to accommodate the City's ageing population.

Recommendation 2 - Protect employment land

Somerton Park commercial precinct is identified as a 'Population Serving' activity area by the Commission in the Discussion Paper. Demand for population serving activities will continue to grow, with new opportunities emerging in regions with higher rates of population and dwelling growth. While land in the City of Holdfast Bay has become an attractive proposition for residential development, there is a continuing need to safeguard employment land near where people live to provide services that meet the needs and demands of the growing population. Decisions need to made about where and how these services can be located. What is evident is that the homogenous industrial land uses that first established in the Somerton Park precinct are slowly transitioning to cleaner and more eclectic activities that are more compatible with established uses in the surrounding residential areas, but also that the area has the potential to become an employment hub for the local population and its evolving demographic. In summary, the following principles should be applied to the Somerton Park commercial precinct:

- Balancing the protection of employment land for serving new residents and rezoning for residential development.
- Promoting mixed use precincts that can accommodate new housing and a range of activities to provide for the needs of a growing population.
- The role of neighbourhoods and activity centres in accommodating compatible non-residential
 uses, such as education, social services, retail and recreation services, near where people live.

The accompanying plan provides a visualisation of this planned growth. It is important that in the spirit of a Discussion Paper that the council is re-engaged in a more meaningful way as part of the drafting of the Regional Plan proper. The council is particularly keen to understand what design measures and safeguards the State Government intends implementing to underpin the growth potential offered as part of this submission. There is also a need to ensure that the density figures (i.e. population per hectare) is informed by a location's capacity to manage stormwater and mitigate against further flooding. Similarly, that transport systems (private and public) can adequately function in an environment of population, and that the State Government invests in the social services and community facilities that are required to sustain a growing population.

Objective 4: To build environmental resilience and reduced carbon footprint in the pursuit of urban growth

The Council notes that the Discussion Paper has an emphasis on urban growth that is supported by good environmental outcomes, including providing a balance between an increase of the urban footprint whilst maintaining access to open space. As a coastal council, the City of Holdfast Bay is aware of the role that its beaches and foreshore play in providing residents with areas for passive recreation. However, access to the coast is seasonal and does not provide opportunities for the structured and year-round activities offered by inland areas of community open space. In this regard, it is imperative that in calculating the ratio of open space relative to urban development, particularly for the emerging coastal areas along the proposed southern growth spine such as Goolwa, Middleton, and Port Elliot, that the coast is excluded. This will

ensure that Regional Adelaide's new urban areas are serviced by an adequate amount of communal open space required for both active and passive use throughout the year.

Council's submission seeks to apply an environmental lens across the growth projections. Council's Environment Team has studied the Discussion Paper closely, identifying some prime motivators for driving a growth agenda for where growth occurs in Holdfast Bay. The three prime motivators being:

- The need to build in resilience for new neighbourhoods. When deciding the location of new neighbourhoods (strategic infill and greenfields), you 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 the carbon footprint is to live in a smaller house close to other people.

It is noted that the Discussion Paper highlights four key themes for a positive and resilient future:

- 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 council 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. 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 efficient 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 more specific about the key mechanisms that will enable this change to occur, and this change needs to occur quickly. In the face of a rapidly changing climate, and failing planning policies, the City of Holdfast Bay is most concerned about:

- a. A nature- and 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 our homes protecting and promoting good health in the face of extreme weather?)
- e. Not creating new risks (because we have enough legacy risk to manage now).

To achieve this, the council provides some specific points to be included within the Greater Adelaide Regional Plan.

Recommendation 1 - Apply Net Zero

The South Australian Government has set goals to reduce South Australia's greenhouse gas emissions by more than 50 per cent below 2005 levels by 2030, and to achieve net zero emissions by 2050. To meet these targets, there is a small but 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, it is in a strong position to support and enable the complete transition to net zero (e.g. net zero buildings, electrify everything, solar and wind generation land, higher density living, new transmission lines, reduced transport use, etc) but needs better alignment.

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 this transitional climate risk. The move to a seven star energy rating for new homes, scheduled 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 of Australia (PIA), <u>Achieving Net Zero Emissions</u>, highlights where planning needs to enable this action and reduce carbon in every sector, including Energy, Manufacturing, the Built Environment, Transport, 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.

Recommendation 2 - Apply 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, as are the current State Planning Policies. It is also concerning that there is insufficient recognition of the value of greening, trees in particular, in climate change mitigation (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 that tree canopy cover is just 16.7 per cent, well below global benchmarks, and yet trees are the cheapest and most effective mechanism for providing urban cooling.

As South Australia's climate becomes steadily hotter and drier, the urban heat island effect is projected to catapult Adelaide into its first 50°C day within the next decade. Urban tree canopy is critical for mitigating urban heat islands, but despite strong efforts from local governments who have been planting tens of thousands of trees each year, Adelaide's overall canopy is declining. The primary cause of this decline is tree removal on private land driven by urban infill. Exacerbating matters is the fact that Adelaide currently has the weakest tree protection laws of any Australian capital city, where protection is only afforded to the largest trees, with a myriad of exemptions that voids protection for many of those trees, and a lack of an adequate tree valuation mechanism to facilitate investments in canopy 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 the 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, which has driven Adelaide's canopy down to such alarming levels.

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.

Recommendation 3 - Protect our tree canopy

The first casualty of infill development is established vegetation and permeable private open space. It is therefore critical that existing tree canopy is maintained and that urban greening priorities are identified as part of any strategy to consolidate the urban environment. In this regard, identification of areas suitable for infill must have regard to the impact caused to the number of established trees within neighbourhoods and ensuring that policies are enhanced to require housing design that does not create micro-climates and contributes to thermal massing within neighbourhoods.

Recommendation 4 - Apply the '3-30-300' rule for trees for infill development

- 3 trees visible from every home (and business);
- 30 per cent 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 infill developments achieve compliance with this rule is an important step to improving Adelaide's climate resilience and ongoing liveability.

Recommendation 5 - Build-in Hazard Avoidance

Climate change is not some future event. Regional Adelaide is 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), the climate conditions a century into the future need to be considered – this is how long the effects of your decisions will be felt. Planning authorities can choose to build in resilience for new neighbourhoods, or choose to build in vulnerability. There is an urgency to take this opportunity now to build sustainable, liveable, healthy and affordable growth areas for the future.

2090 is the latest year for which there is high-confidence climate data. 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 liveable, insurable, comfortable, healthy, affordable to live in, or regularly exposed to flood, and sea level rise risks. Insurability is already being discussed at a national level and is already unachievable for many Australians.

The best information available about the future climate was published by DEW in 2022. It says that by 2090, Adelaide could experience 121 per cent more extreme rainfall days, 79 per cent more days of extreme heat (35°C+), 64 per cent more severe fire danger days, and 61cm of sea level rise. These are significant changes. 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 be felt the most (for example, by using spatial models of coastal and 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.

For example, the proposed Dry Creek development area is already expected to be mostly under water in the highest tide events. At the end of the century, the entire site is expected to be inundated. Developing this site is likely to build in vulnerabilities and costs to both occupants and governments. For example, clean-up costs are often uninsured and fall to governments to cover. A 2019 estimate from the Insurance Council of Australia put the average clean-up cost per property at \$50,000, making the potential uninsured cleanup cost for this planned district at \$500M per flood event. The annual cost of dealing with natural disasters is \$378 per annum and increasing. The 'black summer' bushfire season in 2019-20 was Australia's costliest natural disaster ever and has cost Australia more than \$1008. These costs to the Australian community can be reduced by building in resilience now.

Recommendation 6 - Build Better, Healthier Housing

The way that the GARP is implemented via the Planning and Design Code, needs to be addressed through this consultation process. Therefore, council is providing comments regarding this because what is built now needs to be resilient to worsening climate impacts during the next 50 – 80 years.

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. As Greater Adelaide shifts from being a Mediterranean to a semi-arid climate, providing 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 six to seven 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 SA. While acknowledging this factor, it is also vitally important to acknowledge that the SA building industry is currently under intense pressure. There have been several high-profile building companies collapse in recent months with what the Housing Industry Association is calling a "profitless boom". For SA to turn 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 project key issues into the future, entrenching cost-of-living pressures and climate vulnerability through increasing hazard exposure.

Climate hazard exposure is not adequately addressed in the Planning and Design Code (the Code). Ideally, in order for the Code to address systemic, cascading and compounding climate risk, the Code should account for (as an example) heat hazard exposure, flood risk, sea level rise, storm surges, higher intensity 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. This consideration also needs to acknowledge that the built environment has a key role in supporting and meeting South Australia's Net Zero and emissions reduction 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.

Recommendation 7 - Reduce Car Dependency

Greater Adelaide has a large geographical footprint with low population density, making it challenging to service through public and active transport routes. As such, Adelaide is heavily car-dependant. Car dependency is very much *baked into* Greater Adelaide's urban form. 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 outcomes. In addition, due to a cost premium for space, many newer developments have reduced off-street parking due to smaller garage spaces, which can create unwanted street congestion as residents park outside their homes.

Directing land use planning to create employment zones close to residential areas and improving public transport and active transport routes will go some way to reducing car dependency. However, it is unlikely that Adelaide will become less car-dependant in the next three decades without substantial infrastructure investment and cultural change programs. In this regard, there needs to be 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 pricepoints to accommodate low-income, essential workers, first home buyers and families who want to embrace 'Living Locally' within existing urban environments. However, the transition to medium - higher density dwelling options typically comes with increased spaces and places given 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.

A good example of this is the Outer Harbour Greenway that runs from the edge of the City of Adelaide, along the rail line to Outer Harbour. Along the route are a number of urban renewal projects both underway and in

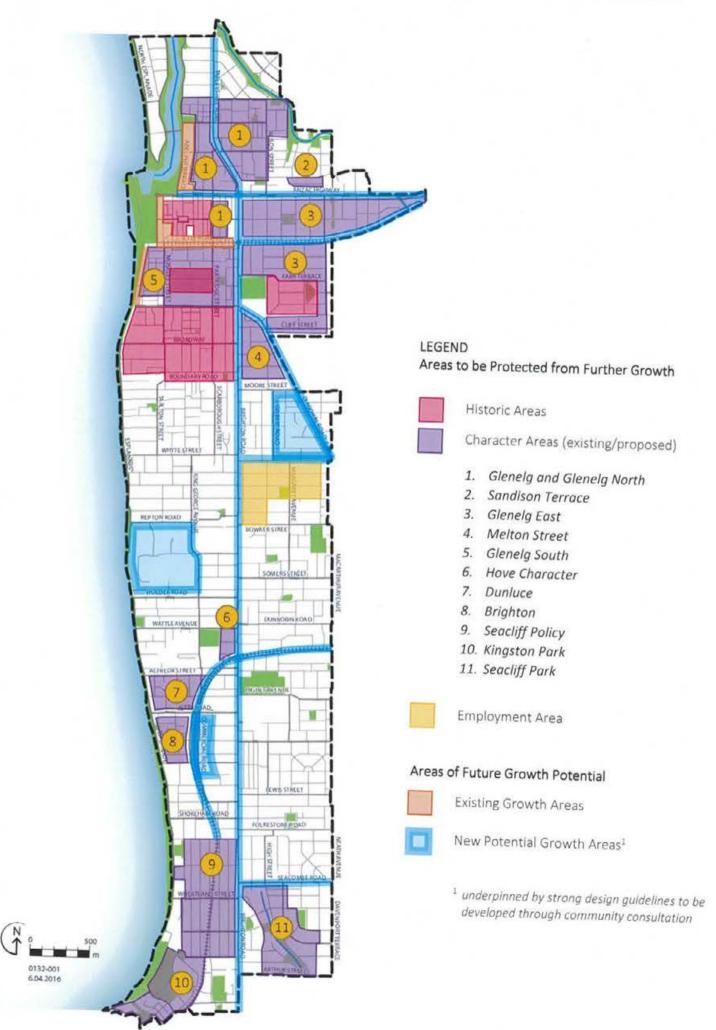
the pipeline (examples being Bowden, Gasworks precinct, Kilkenny, St Clair, Woodville Road, and the housing development completed and underway around the inner harbour). Just south of Bowden is the former brewery site and industrial lands in transition along the first section of Port Road, which has excellent connectivity to light rail and green space immediately adjacent. All these developments have the capacity to demonstrate higher density urban living that can transition to car light / car free uses primarily due to proximity to excellent public transport, active transport corridors, access to green space and being contained within existing urban areas. While the City of Holdfast Bay does not have large strategic sites for similar infill initiatives, it does have road and rail corridors that if designed well, could accommodate more households.

The City of Holdfast Bay hopes that its response to the Discussion Paper provides some valuable insight for the next stage of the process, and that the council continues to be engaged as part of any growth strategy for the suburbs within the City of Holdfast Bay.

For further information or clarification on council's submission, please do not hesitate to contact Anthony Marroncelli, Manager Development Services on

YOURS SINCERELY

Amanda Wilson MAYOR



DTI:PlanSA Submissions

From: Craig Doyle

Sent: Tuesday, 31 October 2023 9:27 PM

To: DTI:PlanSA Submissions

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper

Attachments: Greater Adelaide Regional Discussion Paper Submission (Final) + Attachment.pdf

You don't often get email from

Learn why this is important

Attention: Growth Management Team, Planning and Land Use Services,

Please find attached a Greater Adelaide Regional Plan Discussion Paper submission from Light Regional Council.

Please contact me if you have any questions with respect to this matter.

Best regards,

Craig Doyle | General Manager - Strategy & Development



Email: Phone: Mobile:

Postal: PO Box 72, Kapunda SA 5373







The information contained in this email is intended only for the use of the person(s) to whom it is addressed and may be confidential or contain privileged information. If you are not the intended recipient you are hereby notified that any perusal, use, distribution, copying or disclosure is strictly prohibited. If you have received this email in error, please immediately advise us by return email and delete the email without making a copy. The Light Regional Council advises that in order to comply with its obligations under the State Records Act 1997 and the Freedom of Information Act 1991, email messages sent to or received may be monitored or accessed by Council staff other than the intended recipient. No representation is made that the email or any attachment(s) is free of viruses or o her defects. Virus scanning is recommended and is he responsibility of the recipient.



31 October 2023

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

Per e-mail: plansasubmissions@sa.gov.au

Dear Growth Management Team,

Re: Greater Adelaide Regional Plan Discussion Paper Submission

Thank you for the opportunity to provide a submission on the Greater Adelaide Regional Plan (GARP) Discussion Paper. This Paper is recognised as the precursor for a growth strategy taking the defined Greater Adelaide Region through to 2051.

Light Regional Council (LRC) has experienced sustained residential growth over a 25-year period through the development of the suburb of Hewett, expansion of Freeling, Greenock, Wasleys and Kapunda, and more recently the commencement and continuing construction of the Roseworthy Township Expansion (RTE).

As the State Planning Commission (SPC) has identified within its GARP Discussion Paper, there are several challenges to anticipate and plan for to accommodate the forecast population growth, noting climate change, improving sustainability, reducing greenhouse emissions, increasing housing diversity, reducing costs of living, reducing energy consumption and travel distances, maximising trunk infrastructure utilisation, maximising water use (including harvesting and re-use opportunities), preserving biodiversity and tree canopy and preserving agricultural and productive land and tourism areas amongst these.

Amid this planning process, Council recognises that housing affordability, and the current rental vacancy rate, are immediate challenges that the State Government has responded to by 'fast tracking' forecast land releases to relieve market pressures.

Email light@light.sa.gov.au
Post PO Box 72, Kapunda SA 5373
Phone 08 8525 3200
Web light.sa.gov.au

Principal Office 93 Main Street Kapunda SA 5373

Kapunda Public Library and Visitor Information Centre 51-53 Main Street Kapunda SA 5373

Freeling Public Library and Customer Service Centre 7 Hanson Street Freeling SA 5372

Planning and Development Services 12 Hanson Street Freeling SA 5372

Operations Centre 11 Stephenson Street Freeling SA 5372 The proposal within the Discussion Paper to focus on nominated 'spines' for growth, based on leveraging 'trunk' infrastructure investment, is acknowledged, balanced as intended by metropolitan contributions in the various forms of strategic infill, CBD development, urban corridor growth, rejuvenated suburbs and general infill.

As a separate observation, the GARP Discussion Paper does not appear to contemplate housing options that are gaining debate in social discourse, such as more flexibility around alternative 'infill' accommodation options such as 'granny flat' types (Ancillary Accommodation).

The GARP Discussion Paper seems to preference greenfield development options over infill and seems to lay the foundation for potential future encroachment into the Environment and Food Production Areas (EFPAs).

Based upon its experiences during some 25 years of township expansion (most recently and at the largest scale at Roseworthy) and the development of the suburb of Hewett, Council wishes to emphasize the critical importance of ensuring the timely provision of infrastructure to support (particularly Greenfield) growth including:

- Drinking water and sewer
- Roads/intersections
- Sports and recreation
- Public transport
- Active transport (cycling and walking)
- Power supply augmentation that is adaptive to a swiftly changing energy supply/use landscape
- Education
- Health
- Emergency services
- Stormwater management
- Greener/cooler suburbs that are ready for a warming/drying climate.

To do this most effectively and efficiently will require all parts of government collaborating on structure planning for new growth, reflected in individual departmental and corporate strategic planning, and then working with the development sector to plan and deliver this when necessary.

Our Council is concerned that the provision of key infrastructure is already behind impending and future needs, particularly in the areas such as drinking water and sewer, public transport, regional recreation, education, health and emergency services.

The formation of State Government of the Housing Infrastructure Planning and Development Unit (HIPDU) to help drive residential developments and coordinate infrastructure investment is acknowledged and Council looks forward to seeing the role it will play develop in coordinating the various infrastructure requirements required to not only accommodate current needs but also future growth.

Such coordination and service provision are critical, particularly to achieve the worthy aims mentioned in the Discussion Paper, such as the concept of 'living locally' and providing a much greater diversity of housing choices. Otherwise the risk is that previous experience will repeat itself, where new greenfield development becomes established with limited public transport and local services and employment, requiring families to have at least two vehicles (and larger detached homes) to access these, making it difficult to realise some of the alternatives that are being contemplated.

Taken as a whole, the total costs of Greenfield expansion are considerable and ought to be balanced, factoring in the value of land lost from productive agriculture, or as habitat, or for tourism, against the costs of various forms of infill, where existing abovementioned services are more likely to be available and may be leveraged or augmented.

The proposed recognition of the full cost of providing the entire suite of services needed in new greenfield growth areas earlier in the process is a welcome approach, particularly as it is likely that such analysis will reinforce the value in first prioritising available infill options in preference to further expansion of the urban footprint.

Amid the focus upon planning for growth, there is also the corresponding need to provide greater certainty regarding the future of the areas 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.

In this, 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 allowance of any further appropriate value-adding employment opportunities and separately the type and scale of activities within the rural living zones of these areas.

Council supports the concept of '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. The notion of using parts of these areas for recreation purposes is also supported.

Proposals for LRC Area

The Discussion Paper's identification of Freeling and Kapunda for investigation for modest township growth within existing infrastructure capacity is supported, particularly as a potential means of ensuring that key services in the community, such as the Kapunda Hospital, are retained at a high functioning level for the community.

The identification of Roseworthy as a 'Growth Investigation Area' in the Discussion Paper revisits attention to this location that commenced in 2009 when it was declared as a 'State Significant Area' by

State Government, through the 30-Year Plan for Greater Adelaide and development of the Roseworthy Garden Town Concept, and then the progression of the RTE Development Plan Amendment between 2014 and 2016.

The RTE area currently under construction has already seen the approval of 1,086 allotments. The development of its Activity Centre is imminent, which will provide retail and commercial services for the growing community and will assist in servicing any future growth. The land within the Strategic Employment Zone is available to provide employment opportunities to support such residential growth.

With respect to any potential enlargement of Roseworthy, at its Ordinary Meeting on 13 December 2011, Council resolved to support the Roseworthy Garden Town Concept Plan as presented by the Roseworthy Garden Town Alliance – Other Parties comprising; The University of Adelaide, Hickinbotham Developments (Roseworthy), and Regional Land, and its related supporting documents, as the basis for the preparation of a related Structure Plan. A copy of this Concept Plan is attached.

In this, Council has a previous resolution supporting the concept for a larger Roseworthy growth as envisaged almost 12 years ago.

Through the development of the more modest RTE, LRC has gained a greater appreciation and understanding of the considerable resourcing needed to implement growth policy changes, negotiate Infrastructure Deeds with multiple landowners and developers and then oversee the development including application assessment and implementation of such deeds.

Council notes that it is likely that any additional growth at Roseworthy would be in the 16–30-year period of the proposed planning timeline and such growth would likely be more incremental and modest than that envisaged under the *Roseworthy Garden Town Concept Plan*.

Based on its observations related to the RTE, a further expanded Roseworthy would require earlier augmentation of trunk infrastructure capacities (see list earlier in this correspondence). Historically, Council has emphasized the need to activate the currently disused rail corridor to provide a critical public transport connection the train line in Gawler (e.g. re-introduce a dedicated transit connection like rail, light rail, or dedicated busway, in addition to an active transport connection). Enhanced water, sewer, power and stormwater management infrastructure will also be critical considerations with respect to any enlargement of the Roseworthy area.

Other infrastructure that would need to be planned for and potentially provided in advance of such growth would include essential hospital and allied health, primary and secondary education and emergency services.

With respect to education, Trinity College, a private co-educational school providing schooling from early years to year 10 ,will commence operation for students from Reception to year 4 in February 2024 within the RTE. The school will expand as demand increases and will incorporate a secondary school.

The Education Department's Roseworthy Primary School is a much-valued community asset. However this school is based on a constrained site in terms of its land holding area, and its ability to increase its student numbers (currently some 173) is limited by its existing classroom numbers.

The land outside of the current boundaries of the RTE, Freeling and Kapunda is within the EFPA. Council notes that any further expansion of these boundaries would require an assessment of the need for such land for residential growth against its landscape, environmental and food production significance. In the case of Roseworthy in particular, the SPC notes that extending further development at Roseworthy would need to be balanced against the contribution made by the affected land to the State's economy, such as through cereal cropping, which is also acknowledged by Council.

Council appreciates the opportunity to provide input to the Greater Adelaide Regional Plan at this early stage and would welcome further input into its development should the opportunity arise. Should you have any related questions, please contact Mr. Craig Doyle, General Manager, Strategy & Development via ph. 8525 3200 or at light@light.sa.gov.au.

Yours sincerely

Bill O'Brien

Mayor

Enc.

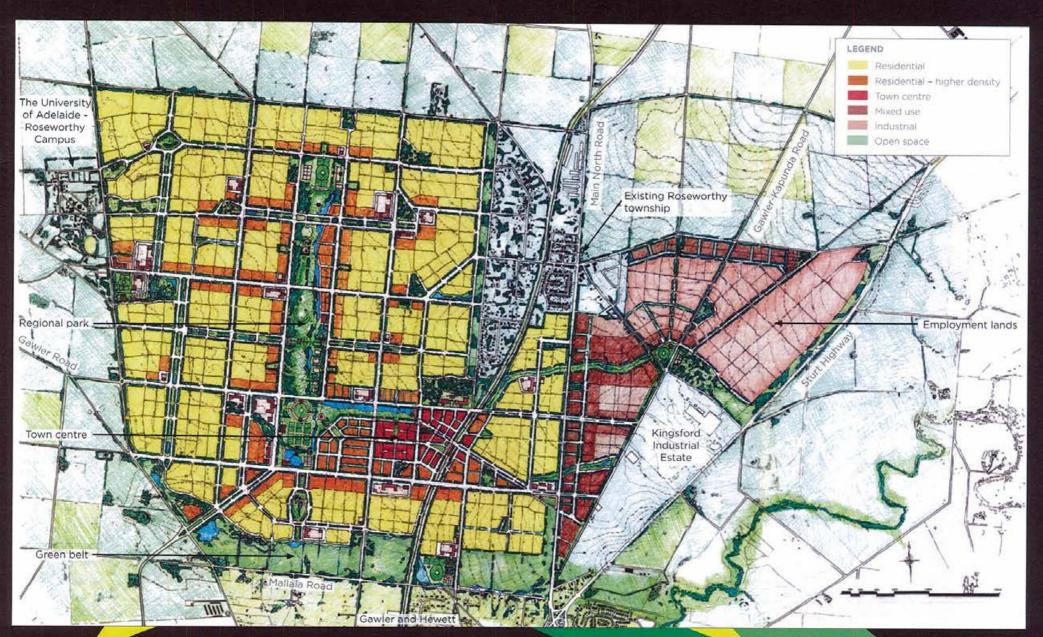


Richard Dodson

Chief Executive Officer

Draft concept plan





DTI:PlanSA Submissions

From: Murphy, Benjamin (DTI)

Sent: Thursday, 30 November 2023 10:58 AM **To:** David Barone; DTI:PlanSA Submissions

Cc: Warwick Deller-Coombs; Robertson, Ashleigh (DTI); Ballard, Matthew (DTI)

Subject: FW: GARP Discussion Paper - City of Marion Response

Attachments: GARP Discussion Paper Submission FINAL.pdf

Importance: High

OFFICIAL

Hi David,

Thank you for sending through. We will be briefing the Commission on the DP submissions in coming weeks.

@DTI:PlanSA Submissions can you please action this and update in the database?

Kind regards,

Ben Murphy

Department for Trade and Investment

From: David Barone

Sent: Thursday, November 30, 2023 10:52 AM

To: Murphy, Benjamin (DTI) ; Gill, Cherie (DTI)

Cc: Warwick Deller-Coombs

Subject: GARP Discussion Paper - City of Marion Response

Importance: High

Hi Cherie and Ben

Attached is our Council endorsed submission for the Discussion Paper.

Happy to chat further and further engage I the next few months in the GARP preparation.

Regards

David Barone

Senior Strategic and Policy Planner | City of Marion

PO Box 21 Park Holme SA 5043











The City of Marion acknowledges we are situated on the traditional lands of the Kaurna people and recognises the Recognises

Greater Adelaide Regional Plan Discussion Paper

Submission of the City of Marion

November 2023



Contents

1. Introduction	3	4. Supporting Infrastructure	14
2. How Should Adelaide Grow?	4	4.1 Public Transport Network	14
2.1 Guiding Outcomes	4	4.2 Stormwater Management	15
2.2 Live Locally Concept	6	4.3 Utility Planning	15
3. Where should Adelaide Grow?	7	6. Open Space and Greening	17
3.1 Strategic Infill	7	7. Implementation	18
Edwardstown (former Hills site)	8	Net Zero Target	18
Bedford Park	8	Design Quality	18
Warradale Barracks	9	Measurable and transparent targets	18
171 Morphett Rd Warradale (Bus Depot)	9	Ongoing Collaborative Approach	18
Marion Shopping Centre	10		
4 Aroona Road Hallett Cove	10		
3.2 Corridors	11		
South Road Corridor	12		
Marion Road Corridor	12		
Morphett Road Corridor	13		
3.3 Regenerative neighbourhoods	13		



1. Introduction

The City of Marion recognises the Greater Adelaide Regional Plan (GARP) as an important policy document for our City, Adelaide and our state. It's role is to set the spatial planning framework for Greater Adelaide over the next 30 years.

Council congratulates the State Planning Commission on its Discussion Paper as a way of drawing interest and knowledge of the Regional Plan, as well as calling for and exploring ideas about how Adelaide should be shaped into the future.

This submission has been structured to respond to the key elements of the Discussion Paper, including the key questions of:

- · How should Adelaide grow?
- · Where should Adelaide grow?

As part of the Inner-South Adelaide sub-region, Council's interests are limited to those parts of the Discussion Paper that will influence our urban form and city structure, and as such, we do not provide any commentary on the issue of greenfield growth for example.

This submission has been prepared through a collaborative workshop across the organisation, aimed at drawing together the range of different skills and interests across the responsibilities of Council that influence land use planning, design, infrastructure, environmental and community development outcomes. Further discussion and feedback was provided with Council Members from initial ideas, opportunities and constraints for the City of Marion.

It draws on existing strategic directions, priorities and commitments identified by Council, noting that our Strategic Plan is in the process of being updated and may further inform our feedback on the Draft GARP into the future.

Whilst all of the commentary and formal submission points listed within this document may not be able to comfortably sit within the future GARP document, they nevertheless provide important context and broader considerations for the Commission, and the Minister for Planning, in implementing the Regional Plan, in order to further evolve and improve the Planning System.

2. How Should Adelaide Grow?

2.1 Guiding Outcomes

The Discussion Paper provides four guiding outcomes that are intended to inform the Regional Plan's ideas and delivery.

As high-level aspirations about how Adelaide should grow, Council supports the Guiding Outcomes. However, there does not appear to be clear translation of how the Regional Plan will ensure the achievement of these outcomes.

Council believes that there should be transparency as to the achievement of the guiding outcomes, through measurement, either through targets or key performance indicators.

A greener, wilder and climate resilient environment.

Ensuring our urban environments are greener and responsive to climate change impacts is important, not only to maintaining and supporting biodiversity, but will play an important role in maintaining amenity and liveability of our urban environments.

Council remains concerned about the state's ability to achieve this guiding outcome. Based on recent analysis on canopy cover across areas where infill development has occurred it is clear that current planning controls and mechanisms are failing to deliver green outcomes for our neighbourhoods.

Investigations informing GARP need to explore new ways of delivering greener development outcomes, above and beyond simply relying on achieving canopy targets within streets and public reserves.

As our urban environments experience hotter days more often, the quality of spaces will benefit from canopy cover and greening, as will the quality of lifestyle and amenity that trees and vegetation provide, making these places for attractive places to live.

There is strong community sentiment on addressing this issue as a priority.

A more equitable and socially cohesive place.

Council recognises that there are increasing challenges to achieving making our cities equitable places. Housing affordability and supply, including rental supply, continues to threaten accessibility to appropriate housing in locations that are accessible to services and employment.

Council remains concerned that affordable housing targets, particularly within inner and middle suburban areas remain difficult to achieve, and considers that there may need to be a greater role for government in delivering such housing outcomes.

Council is concerned that there appears to be a lack of focus on public and active transport and its integration with land use planning within the Discussion Paper. The distribution of reliable, frequent and convenient public transport is critical to delivering on all of the guiding outcomes, but resonates most with equity, where communities have reduced access to cars, or where public transport is poor are disadvantaged. This also applies to specific cohorts of our community, such as the elderly and children.

Central to understanding what will drive an equitable and socially cohesive place is meaningful engagement with our communities. Meaningful participation and discussion as part of the Regional Planning process needs to remain a priority for the Commission.



The state has invested in public transport and housing growth that increases its usage supports this investment.





The Tonsley Innovation Precinct has successfully grown and diversified the City of Marion 's economy.

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

Council supports the desire to transition our city's economy into the future. The Tonsley Innovation Precinct is testament to the value in a strategic approach to employment lands.

Achievement of this guiding outcome will require clarity in the future role and function of different employment precincts across Adelaide. Increasingly, inner suburban employment lands are coming under threat to rezoning for housing development.

It is critical that employment lands in these locations are recognised for their strategic importance and protected from further intrusion from forms of development that threaten their long-term sustainability. Increasingly, these precincts also need to be supported by programmed delivery of required infrastructure, supported by the creation of high quality public spaces increasingly required to retain and attract workers.

A greater choice of housing in the right places.

This outcome is supported and is critical in ensuring that the above outcomes are also able to be achieved.

Council is concerned that greater choice and diversity in housing is not being delivered through general infill development within our neighbourhoods.

The GARP needs to address how increased diversity in housing supply, including greater development of apartments, as well as smaller housing formats (single and two bedroom homes) can be meaningfully delivered.

Council believes that this requires more than just rezoning of land and encourages the Commission to investigate the broader range of measures that may be available, both within and outside of the planning system.

There also needs to be broader discussion and agreement amongst the community as to what the "right places" are, to ensure clarity in understanding what this means for how these locations will change over time, particularly if this is intended to cover broader areas than the strategic infill sites and growth corridors.



Recent apartment and terrace housing at Tonsley.



Local centre at Finniss Street, Marion will continue to have an important role in supporting the live locally concept.

2.2 Live Locally Concept

The Live Locally concept is supported by Council as a model from which to base the future structure and form of Adelaide. Council acknowledges the many benefits of this model in supporting:

- equitable access to services and facilities
- more sustainable movement and transport
- walkability and support for healthier lifestyles.

The concept can, and should, be applied not only to new neighbourhoods and those accommodating growth, but also other established neighbourhoods.

The GARP should recognise the challenges of the concept in some neighbourhoods where walkable access to services and facilities is not convenient, either through current land use patterns, topography or the nature of the road network. Within the City of Marion, the suburbs of Hallett Cove, Sheidow Park and Trott Park have these characteristics.

GARP should also consider and provide direction and a range of planning and non-planning system solutions to encourage the evolution of these locations to a model that better supports living locally.

The live locally concept reinforces a polycentric structure to Adelaide, focused on key activity centres and employment nodes. Whilst this is generally supported, the existing public transport network is highly focused on servicing the Adelaide CBD, and will need to be reconsidered to support the range of cross network movements that will be needed to service the different way we want our community to use our city.

In this regard, the GARP needs to strongly correlate with a transport strategy for Adelaide, supported by commitments and investment in public transport service and infrastructure improvements, as well as facilitating additional active transport connections.

The City of Marion is fortunate to have strong public transport and active transport infrastructure in place, including two rail lines (Seaford and Flinders), the tram line, a major bus interchange at Marion Shopping Centre, greenways and shared use trails. This lends well to supporting living locally, however, the potential growth opportunities identified within the Discussion Paper do not adequately articulate this.



3. Where should Adelaide Grow?

The Commission's Guiding Outcome of "A Greater choice of housing in the right places", is a critical factor in considering how and where Adelaide should grow. The 30 Year Plan for Greater Adelaide provided some basis for a structure for growth, originally centred on planned fixed line and frequent public transport routes (modelled on the AdeLink tram expansion project which has since been abandoned). Notwithstanding some successes around achieving and exceeding targets for housing growth within established urban areas, the degree of success around meaningful housing choice and the right locations remains questionable.

The City of Marion's experience has been principally in the form of infill housing which, in reality, offers very little diversity and choice in format and size (most are detached with three or four bedrooms), and does little in terms of provision of affordable housing outcomes. Infill has occurred in locations that have limited convenient access to services or frequent and reliable public transport to warrant a shift in modes (or in the very least reliance on single car households), and this has created significant issues in regard to on-street parking and traffic volumes that are resonating loudly with our community. This is no doubt consistent with other local government areas where significant levels of infill have occurred.

Council therefore supports the idea of identifying and prioritising strategic locations for growth within established urban areas ahead of reliance on general infill to achieve housing targets into the future, acknowledging that general infill will continue to play a role in delivering housing into the future, given it is an "easier" way to deliver housing.

Over the last 5 years, new housing within the Inner South Region has been derived principally from general infill (83%). Council seeks that the future focus on strategic growth locations takes precedent and allows for reduced reliance on general infill.

3.1 Strategic Infill

Council supports the two identified Strategic Infill sites within the Discussion Paper and suggests additional potential strategic infill sites for further investigation as identified below and on the following pages.



Edwardstown (former Hills site)



Why this site?

- 14.6 hectares site, mostly vacant, zoned Urban Neighbourhood directly adjacent to the Castle Plaza Shopping Centre.
- Excellent connections to Flinders, Tonsley, Marion Centre, CBD, Glenelg and Mitcham Centre.
- State and one other single owner.

Opportunities

- Potential for increased building heights that accommodate apartment housing formats.
- Potential railway station to better link this location to key employment nodes north and south.
- · New east-west road link being delivered by DIT.
- Potential for new night-time economy focus in Raglan Avenue main street environment.

Challenges

- Delivery and interruptions from the T2D project (in the short term).
- Contaminated land and limitations for habitable rooms at ground level.
- Rail crossing should grade separation be programmed/budgeted into the future?
- Short term interface management with established businesses until they relocate/redevelop.

Bedford Park



Why this site?

- Proximity to both Flinders University and Tonsley as key employment and education nodes.
- Proximity to train line and large areas of open space.
- Underutilised sites with mostly large expanses of at grade parking.

Opportunities

- Mixture of eduction, office and commercial development linking to, and building on, surrounding activities.
- Potential for accommodation (visitor and student) and housing at higher densities, ideally apartment buildings set within a landscape setting connecting to adjacent open space.

Challenges

- Kaurna cultural significance.
- Potentially contaminated land.
- North-south corridor is a major barrier to access and potential detractor of amenity.



Warradale Barracks



Why this site?

- Large land holding under single government ownership
- Potential changes to accommodation needs of Defence Force personnel in Adelaide.
- Excellent access to district open space (Oaklands Estate) and Marion Centre.

Opportunities

- Masterplanned community achieving a range of housing typologies and densities.
- Integrate and link to Sturt Linear Park, including for accommodating broader catchment stormwater capacity
- Accommodate existing mature vegetation that exists across the site.
- Potential for integration of new accommodation for Defence Force personnel on smaller portion of site.
- Potential to integrate / connect to Oaklands Green community.

Challenges

- Potential contamination for parts of the site.
- Availability of the site required Commonwealth Government commitment (and possibly need to relocate facilities)

171 Morphett Rd Warradale (Bus Depot)



Why this site?

- 8.5 hectares of land utilised as bus depot with access to Morphett Road and Oaklands Road. Currently Zoned Employment Zone.
- Single owner (state agency)

Opportunities

- Potential for mixed use development along Morphett Road (to retain employment land function), and medium density housing above and behind.
- Scope for up to 220 dwellings (average net residential density of 35 dwellings/hectare)
- Provide connections to community to rear
- Close to Sturt River Linear Park and Oaklands Estate Open Space (500m)

Challenges

- Arterial road interface / traffic management
- Potentially some contamination of land
- · Replacement location for bus depot

Marion Shopping Centre



Why this site?

- Overall site is 34 hectares, potentially a third of which is either underutilised commercial development or at grade parking areas.
- Adjacent to a significant bus interchange and a grade separated rail station (Oaklands)
- Already a significant attractor of activity for the inner south region.
- Cooperation and willingness of landowner.

Opportunities

- Significantly underutilised spaces around the perimeter of the site
- Establish night time economy and activity externally to shopping centre
- Greater range of uses and activities, including significant apartment development and office towers
- Opportunity for main street environment on site that better links cultural and sporting facilities to the north
- Improved pedestrian environments and connections

Challenges

- Management of traffic and access challenges for this location
- Integration of land uses needs to be masterplanned and coordinated

4 Aroona Road Hallett Cove



Why this site?

- 80 hectares of vacant land currently within the Hills Face Zone.
- Significant land holding with single owner that allows for a master planned solution.
- Manageable slope to land (consistent with or better than surrounding neighbourhoods).
- Limited visibility from Adelaide plains.
- Inter-urban break between Hallett Cove and Seacliff Park is maintained.

Opportunities

- Increased land adjacent to established neighbourhoods and with easy access to infrastructure
- Visual buffers and biodiversity outcomes can be accommodated within a masterplanned community.
- Increase housing choice offering in Hallett Cove
- Frontage to Aroona Road and Perry Barr Road to traffic distribution.

Challenges

- Proximity to existing resource extraction (Linwood quarry) and achievement of suitable separation distance criteria.
- Changing of current zoning may be politically sensitive.



3.2 Corridors

Council acknowledges that corridors were originally planned along priority public transport focused areas within inner Adelaide and the expansion of the corridors further out from those already identified and delivered is a logical next phase for the GARP.

However, Council remains concerned about the success and liveability of corridors as focus areas for growth.

Adelaide's examples of corridors have largely not been delivered successfully since their inception some 10-15 years ago, and there is already latent capacity in these locations before additional areas are opened up.

Council would like the GARP investigations to include further investigations and consideration on the extent and locations of the corridors, integrated with the role and function of the road corridor. A link and place approach is suggested, informed by a strategic analysis and assessment of the broader road network, as design responses and outcomes will be heavily influenced by the preferred function of each arterial road.

An additional important consideration is the depth of any future identified corridors. Where corridors are proposed a single allotment depth, the ability to achieve the potential densities and building heights needed to support "the missing middle" housing forms are difficult to deliver, and create a number of difficulties with appropriate interface arrangements with adjacent low scale neighbourhoods. Careful assessment of the depth and potential relationships with surrounding neighbourhoods (and utilising parallel streets where they exist) is needed to balance strategic objectives with maintaining an appropriate amenity for existing residents.

The City of Marion is identified with three potential corridors, with each of the three roads having different traffic volumes, connection functions, distribution of land uses and intensity of development fronting them.

It is acknowledged that there are significant factors that will influence the forms of development envisaged for corridors, but a key element is the land accumulation that is required to support the desired housing forms for these locations - made more complex by the fragmented nature of land ownership that exists along the corridors.

Council suggests a greater role for the state is needed to help lead and deliver corridors as follows:

- facilitate the development of catalyst sites along corridors where, for example, large common land ownership or large land parcels exist (development management, partnering or other fiscal incentives).
- establishing a policy framework that better incentivises the delivery of consolidated sites
- protection of corridors from underdevelopment and land owners taking the "easy development" path (i.e. as an extension of general infill).

GARP should consider a more nuanced approach to sequencing and delivery of corridors, not just through staging of rezoning, but alignment of infrastructure spending and prioritising of funding for public realm works to support private investment (a key factor in the success of both Prospect Road and Churchill Roads).



Churchill Road is a successful example of a growth corridor, but are the factors that make it successful applicable elsewhere?

South Road Corridor

The extent of the corridor along South Road within the City of Marion extends south to Raglan Avenue. As part of the North-South corridor, this portion of the corridor is forecast to comprise an open motorway, with the approach to the southern tunnel portal, with the remainder covered by the Tunnel Protection Overlay, limiting further intensification of development (heights are limited to 3 building levels) covering a large part of the extent of the identified corridor.

The Commission is urged to consider the suitability of this portion of South Road, for a corridor, given the potential amenity impacts of the open motorway, as well as issues of connectivity across the motorway for these communities.

It may be more prudent for growth opportunities to be identified further south along South Road within nodes above the tunnels, clustered around a number of neighbourhood hearts, potentially based on existing activity centres in this location.



Proximity of South Road to the rail corridor / Goodwood Road crossing, is mostly a range of commercial and car-related businesses.



Precinct near Maid of Auckland Hotel supports a mixed use corridor focus, subject to managing amenity and interface to rail at rear.

Marion Road Corridor

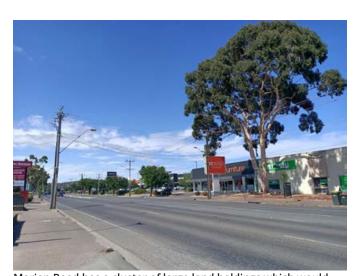
Marion Road is a key transport route, with direct connections to the southern hills communities (Flagstaff Hill and Aberfoyle Park) and the Southern Expressway.

Council has commenced a Code Amendment process seeking to rezone the corridor for potential growth. However, this was challenged by the Department for Infrastructure and Transport with concerns relating to impacts on traffic volumes of the road, and so the ongoing future function and capacity of Marion Road needs to be resolved as part of the GARP preparation.

It is noted that Marion Road is a high frequency public transport route, with connections to the Marion bus interchange, as is nearby Finniss Street.

The southern portion of the corridor currently accommodates a cluster of employment and bulky goods based land uses, which comprise large sites and could potentially transition over time into higher value, mixed use developments.

The corridor crosses both the Adelaide - Seaford rail line and the Sturt River Linear Park, providing broader access, linkages and open space connectivity.



Marion Road has a cluster of large land holdings which would support coordinated high density development outcomes.



Morphett Road Corridor

Morphett Road has lower traffic volumes than Marion Road and the adjacent Brighton Road corridor, both of which service broader populations further south.

Key large land holdings abut Morphett Road, including that owned by the SA Jockey Club at its northern end, bus depot and Army Barracks at Warradale (both potential strategic infill sites), and it intersects with Diagonal Road at the Marion Centre which contains the Westfield Shopping Centre, Marion Cultural Centre and SA Aquatic and Leisure Centre.

The bulk of the land uses fronting Morphett Road are residential in nature and this is different to the other identified corridors which have a far higher proportion of non-residential land uses.



Some recent infill and clusters of older unit developments are common along the Morphett Road.



Older housing stock along Morphett Road would need consolidation to support higher density housing and also manage interface with high voltage powerlines.

3.3 Regenerative neighbourhoods

Regeneration of neighbourhoods where there is a cluster of aged public housing stock has long been a successful strategy of increasing densities, whilst also diversifying tenure within these locations.

The City of Marion has a number of examples where this is current or has recently occurred at Morphettville and Oaklands Green.

The extent of regeneration areas identified within the City of Marion in the Discussion Paper are somewhat limited in their extent and do not necessarily support a sufficiently coherent, contiguous and coordinated neighbourhood outcome beyond what is delivered via general infill development.

In addition, many of the locations identified have already commenced undergoing renewal through substantial general infill development, in most cases at densities that are below those that could be accommodated in strategic locations (such as around the perimeter of the Marion Urban Activity Centre).

Council supports greater opportunities for coordinated regeneration at Mitchell Park / Tonsley, where there is an opportunity to take advantage of proximity to Tonsley and Flinders University, as well as the Tonsley and Mitchell Park rail stations.



Recent regeneration as Morphettville demonstrates potential for masterplanned development outcomes.

Council considers the Discussion Paper misses an opportunity to identify the potential coordinated regeneration of the neighbourhoods immediately surrounding the tram and train stations, including the potential ability (at key locations) to support local service activity centres adjacent to stations, and further reinforce and support the living locally concept.



Potential regenerative areas at Mitchell Park / Tonsley.

4. Supporting Infrastructure

The success in the delivery of the GARP will hinge on the provision of the required supporting infrastructure, at the right time. This requires strategic assessment and forecasting of needs, built into the government forward budgets, as well as provision of sufficient funding for ongoing service/operational delivery.

Council has the following concerns and expectations in relation to the implications for infrastructure rising from the growth anticipated within the Discussion Paper.

4.1 Public and Active Transport Network

Increasingly, the planned growth of Adelaide will continue to place pressure on the existing road network, as development to date has not resulted in the shift away from private vehicle usage.

There needs to be clear strategies and planned investment in capital and operational budgets to supporting and incentivising a shift away from private vehicle usage (or in the least reducing to single car households).

There is also a need to rethink how public transport is delivered and structured across Adelaide to better align to the Live Locally concept and implications for form and movement that would support such a shift in our urban structure.

Elevation of the priority of safe and convenient active transport routes is also critical to supporting live locally whilst also supporting active and healthy communities.

Council would like the GARP to directly address these issues in its content and investigations.



4.2 Stormwater Management

Council remains concerned of the ongoing challenge to the existing stormwater system arising from increased infill development within our neighbourhoods.

There is a concern that reliance on individual on-site retention / detention through tanks (as is currently the preferred policy approach) is not reliable and with the potential for more and stronger rainfall events, capacities of systems will increasingly struggle or fail into the future.

As a long term strategic document, there is a role for GARP to integrate broader catchment management planning into land use planning policy. Key questions to consider include:

- should we be planning for a larger storm event to cater for likely future trends? If so, what are the spatial storage and treatment implications of this for catchments?
- how and where do we accommodate additional catchment capacities within established neighbourhoods where there are significantly limitations in place?

4.3 Utility Planning

Increasingly, growth in dwellings within established neighbourhoods will reach a point which will require substantial augmentation of water, sewer and power infrastructure, which will ultimately be a cost borne by the whole community.

The true costs of the long-term upgrade of infrastructure within existing neighbourhoods needs to be made clear, and programmed within the State Infrastructure Plan.



Oaklands Estate wetland is an example of strategic infrastructure required into the future.

5. Employment Lands

Employment lands at Edwardstown / Melrose Park are not identified within the Discussion Paper, yet is an important employment precinct within the inner Southern Adelaide region. Council considers this location to be a strategic employment location that requires further policy, infrastructure and investment support to:

- protect this location from encroachment of uses that are potentially attracted here but arguably underutilise the precinct or that may compromise longer term employment activities and uses
- ensure it can adapt and cater for demands and future trends impacting on industry and employment precincts (such as quality of spaces, public realm and accessibility), which would serve it well to potentially evolve into a knowledge based and clean manufacturing hub.

This is because:

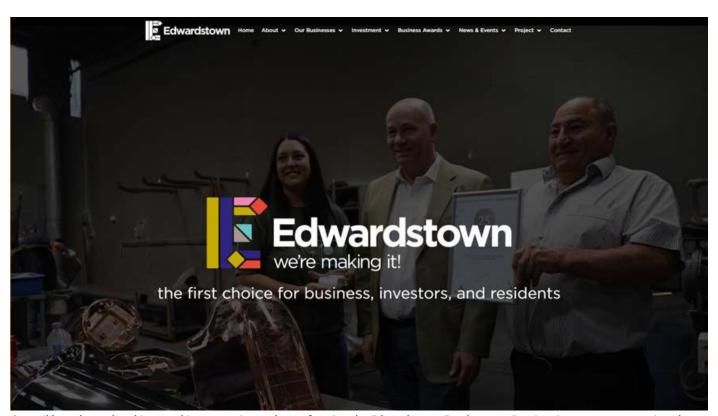
 Council has already undertaken extensive strategic planning and investment in the future of the precinct through the Revitalising Edwardstown project

- the location has excellent access to a skilled workforce and connections to other key employment hubs, including Flinders University, Tonsley and the CBD
- together with Melrose Park, both the City of Marion and City of Mitcham are seeking to work together to solidify the precinct as a key employment node and strengthen its role within the inner south region's economy.

There is a need to provide better employment land opportunities for the southern part of the Council area to suitably service the local community and better support the live locally concept.

GARP should investigate the scope for rethinking the Hallett Cove centre and how connections to, and further diversification of Lonsdale offerings could accommodate a wider range of businesses for the southern suburbs community.

Council also considers that there is scope to increase nature-based retail and tourism linked to, and building on the presence of the significant recreation and nature assets at Glenthorne Park (potentially based around Majors Road where a mixture of uses already exist).



Council has planned and invested in supporting and transforming the Edwardstown Employment Precinct into a more attractive place to set up business. Additional policy support and investment will further reinforce this strategic precinct for inner southern Adelaide.



6. Open Space and Greening

The Discussion Paper provides limited guidance on how the GARP can respond to addressing open space and greening across Adelaide into the future, other than recognising existing assets. This is disappointing given it is a critical component of liveability for our communities and part of the response needed to addressing climate change impacts and combating urban heat island effects.

Council seeks that the investigations informing the GARP, as a minimum need to:

- identify where shortages of open space exist relative to surrounding populations, particularly for those locations where future growth is identified
- prioritise investment (including mechanisms for delivery and funding) of additional open spaces within established urban areas where shortages exist

Council supports the establishment of greening targets within the Regional Plans. The GARP however, needs to include measurable targets and reliable reporting tools (aided by its digital format) so that there is transparency in progress (or otherwise) of these targets.

Whilst there is a clear role in public realm plantings (streets and open spaces) to increase canopy cover, over the last 10 years, the biggest loss in canopy has been from infill development, despite the increased planting programs of Council within public streets and open spaces.

As such, Council believes that there remains an important role for either maintaining or increasing canopy cover within development, and that this needs to be a high priority for the Commission and GARP.

There are significant benefits to trees within development, including improvements to micro climates, potential to better regulate temperatures within buildings and the important contribution they make to the amenity and character of spaces (not just streets and parks).

Vegetation is valued by our community and there is a real concern at the lack of vegetation and greening integrated into recent infill development (regardless of the density). This is beginning to threaten the community's acceptance of infill development and medium density development as desirable solutions within our neighbourhoods.

Council does not believe that density and greening are mutually exclusive, but that they can co-exist. However, alternative policy approaches and solutions are needed that elevate the value and importance of greening within development.

Investigations for GARP, and potentially also recommendations arising out of it, should address:

- current gaps in policy in the Planning and Design Code and whether alternative approaches to policy are needed across different zones in response to the different densities and building formats that may be delivered
- how to place greater value / benefit in retaining existing vegetation (and not just Regulated trees) within development
- linking increased percentages of imperviousness and tree canopy across a site with increased density incentives (which may aid in driving alternative housing formats – the missing middle)
- better integration and requirements for tree canopy cover within non-residential development (activity centres, commercial areas and employment lands)
- mandatory targets for delivery of canopy cover within strategic infill, corridor and regeneration areas that are perhaps higher than other locations that will not be delivered n a coordinated / master planned manner.

Council has also identified a potential opportunity to return the Sturt River so as to increase stormwater management capacity, improve water quality and better support vegetation and biodiversity along this important natural corridor. There is scope to link this corridor into identified strategic infill sites and corridors.

7. Implementation

The GARP document will set out a broad spatial policy and infrastructure framework that will both influence and cut across many aspects of State and Local Government operations. As such, it needs to be treated as a whole-of-government document, aligning with, or setting the strategic directions of agencies, particularly those involved in the provision of physical and social infrastructure, support employment and investment or manage the environment.

Net Zero Target

One of the clear gaps in the Discussion Paper's coverage is the state's transition to Net Zero by 2050, and specifically how the future development of our city will assist with this journey.

Movement and transport of people and goods within the city, along with the construction and operation of housing and commercial buildings will be critical in delivering on this commitment. The Discussion Paper does not provide clear direction as to how future development will need to support low-carbon development outcomes.

Design Quality

Given that Regional Plans set the framework from which Code Amendments will be delivered, Council is concerned that there appears to be little coverage to the quality of design in development within the Discussion Paper.

As one of the SA Planning Policies, design quality will be increasingly important in the successful delivery of the desired new urban form and gain the community's confidence in increased densities and renewal of established neighbourhoods.

Council is concerned that the Planning and Design Code is not providing sufficient policy coverage and strength for the achievement of the desired design outcomes sought for development (particularly recent infill development), and the GARP provides an opportunity to identify Code Amendments which are targeted to addressing this.

Measurable and transparent targets

Council supports the inclusion of clear and measurable targets against which initiatives and progress will be measured. The digitisation of the Regional Plan into the future will aid in the timeliness and access to information and this will benefit all in understanding where things need to be improved or reconsidered.

In particular, should Councils be able to demonstrate that growth targets can be achieved or exceeded as a result of strategic infill or corridor developments, then the opportunity to scale back general infill (either densities, formats or locations to better align the right housing in right locations) should be provided.

Ongoing Collaborative Approach

Council encourages an ongoing collaborative approach of the Commission with Local Government in the preparation of the draft GARP. There is extensive experience and local knowledge in local government, and Council's are best placed to understand and represent their community in the planning for both strategic infill sites and corridors.

Council is also concerned about the potential use of Section 75(1) of the Planning, Development and Infrastructure Act, 2016 to process "complying changes" Code Amendments in response to GARP.

It is vitally important for community confidence in the planning system that sufficient detail and investigations are undertaken and that the charter is adhered to with meaningful and genuine community participation is provided along each component of the process.







22 November 2023

Mr Craig Holden Chair State Planning Commission plansasubmissions@sa.gov.au



Dear Mr Holden

GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

Thank you for the opportunity to provide input into the Greater Adelaide Regional Plan Discussion Paper (GARP Paper).

The City of Mitcham has made several submissions in relation to planning reform prior to and post implementation of the Planning, Development and Infrastructure Act 2016 – from both a Council endorsed position and practitioner perspective.

Previous submissions and council strategic and policy work has in many ways responded (proactively) to a wide range of issues impacting the planning system, including a range of matters the GARP Paper has identified for consideration on a regional scale. The key outcomes set out in the GARP Paper have, and continue to be, of significant strategic interest to the City of Mitcham.

As such, we are pleased to contribute to and participate in the discussion on these topics, as we have over recent years through submissions and policy adaptation and change in our city.

STRATEGIC OUTCOMES

Council supports, in principle, the four overarching themes described in the GARP Discussion Paper. Council considers that it has been a willing and active participant through strategic planning for growth and change in recent years, with all efforts supported by Government and the State Planning Commission to date. Further details in relation to this work are set out under each of the four themes below.

A GREENER, WILDER AND CLIMATE RESILIENT ENVIRONMENT

In 2019, the City of Mitcham declared a Climate Emergency and now adopts this lens in all its decision making. Council advocates for the GARP to adopt a similar approach in its direction. Consideration should be given to climate change mitigation and adaptation in all aspects of Greater Adelaide's future growth and development.

Of note is council's investment and participation in two ongoing state led Code Amendments with direct relevance to climate – namely the Bushfire Protection Areas and the Flood Hazards Code Amendments. Both topics are significant in terms of the impacts of Climate Change and the increase in frequency and duration of such events – but in terms of planning the impact from a growth perspective in appropriately planning and delivering housing and population in areas not at extreme or unreasonable levels of risk.

Notably in relation to flood, council has developed and supplied substantial flood mapping, data and other information to the Government and State Planning Commission (particularly in respect to Brownhill and Minno Creeks), which ought to be spatially represented in the draft GARP for further consultation given constraints that flood risk places on growth and change.

The City of Mitcham is also a member council of Resilient South, a Regional Climate Partnership between local and state governments and other regional stakeholders, focused on delivering practical action to strengthen climate resilience in our communities, economies and natural and built environments.

The planning system, through state planning policies, regional plans and the delivery of development outcomes through the Planning and Design Code provides a wideranging framework to improve climate adaptation and mitigation through land use and development across the state, and the GARP is a significant opportunity to influence these changes in our mostly metropolitan and urbanised region.

To this end, we support submissions made by Resilient South in respect to the GARP Paper, including emissions reduction, urban greening and tree canopy, development sustainability and hazard avoidance.

In addition, we recommend consideration should also be given to the following:

- an increased focus on delivery of a 'compact city' via strategic and general infill
 development as a priority, ahead of a dispersed city (greenfield development),
- greater emphasis on additional active transport options beyond 'walkable' neighbourhoods,
- inclusion of ambitious tree canopy coverage targets across the Greater Adelaide Region, that are benchmarked against interstate counterparts, that will be critical to help achieve a "greener, wilder and climate-resilient" region.
- measurement of tree canopy coverage across the Greater Adelaide Region should consider land uses that strongly influence tree canopy coverage (eg national parks and airports) and which frequently result in misleading reporting of tree canopy coverage within a council area.
 - Consideration could also be given to measuring and reporting tree canopy coverage at a smaller scale than a whole of council area (eg suburb level) to better identify areas that require attention,
- stronger policy (and its appropriate application) around site coverage and soft landscaping requirements for new development to strike a balance and contribute to a 'greener city', and
- advocacy for significantly stronger Building Code requirements to support more sustainable and high-performing residential development.

A MORE EQUITABLE AND SOCIALLY COHESIVE PLACE

Work undertaken by the City of Mitcham over the last seven years responds to the need for appropriate and sustainable urban growth within our council area. This has included a Spatial Vision, structure plans for growth precincts and the subsequent Growth Areas DPA.

The potential for strategic and appropriately designed infill growth in the City of Mitcham is yet to be fully unlocked, which includes the important role that we can play in accommodating more affordable housing close to existing social and community infrastructure.

The planning system alone cannot be relied upon to unlock this potential, and it is recommended that the preparations of the draft GARP be utilized to explore opportunities to incentivise new affordable and diversity housing options in established areas already identified and rezoned to accommodate growth.

A STRONG ECONOMY BUILT ON A SMARTER, CLEANER MORE REGENERATIVE FUTURE

The City of Mitcham is home to a number of essential service, education and employment precincts. The importance of these to the health and prosperity of our community cannot be overstated.

Recent investigations by Council have built on employment land supply work carried out by the state government and reinforce the strategic nature of the few remaining large areas of employment land that have been resistant to residential encroachment.

These existing employment lands are well placed and located to service a growing city with increased emphasis on a smarter and cleaner economy. The City of Mitcham is actively exploring and trialling opportunities to partner with homeowners, businesses and service providers in areas including community solar and EV technology, and look to the GARP to promote, encourage, and incentivise this type of innovation going forward.

Infrastructure investment to accommodate a growing city can also have a significant impact on the condition of existing inner-city areas. Council has turned its attention to surface-level regeneration and revitalisation opportunities stemming from tunnelling for the Torrens to Darlington motorway project.

Details identifying these 'strategic focus areas' has been attached and are recommended for consideration as part of the GARP exercise. We request that the significant public realm / place shaping, and east-west connections set out in these attachments be recognised in the GARP as opportunities to reinforce the importance and viability of our Strategic Employment Lands and strengthen their accessibility and regional strategic connections.

We further request the work undertaken by City of Mitcham to protect our Strategic Employment Land from encroachment by predominately residential uses be spatially represented in the GARP. A copy of Melrose Park Employment Land Study is enclosed for your reference.

A GREATER CHOICE OF HOUSING IN THE RIGHT PLACES

The City of Mitcham is a highly desirable place to live, with excellent access to nature, lifestyle, services and facilities for our local communities. These qualities are celebrated; however, it is important to acknowledge that these benefits also result in development pressures within some neighborhoods.

These pressures include impacts on street trees, car parking, and design quality of some new housing. Council supported the introduction of new urban infill policy through the Planning and Design Code which has been helpful in improving design outcomes in this space.

Nevertheless, we welcome any further opportunities to participate in any ongoing work by the government and PlanSA / State Planning Commission to further strengthen these policies and their application, but again specifically in relation to trees and greening.

We recognise the need for appropriate and sustainable urban growth within our council area, and the need to ensure a supply of affordable and livable housing. In this regard, in 2021 Council delivered on a commitment to re-zoning four of five identified key precincts for urban growth and change, and to unlock additional market and investment opportunities within our city, as part of our long-term Spatial Vision for the City of Mitcham.

Council's strategic local area planning work and subsequent outcomes have, in part, increased housing choice and location for residents within the City of Mitcham, particularly within the key growth precincts. This work reflects the strategic investigations in the GARP Discussion Paper and should be recognised in the draft GARP itself.

We strongly urge the Commission that Council's strategic local area planning work and subsequent outcomes through to Growth Areas DPA be spatially represented in the draft GARP for future consultation. Should you require any of the investigations or evidence prepared by the City of Mitcham to deliver the Growth Area DPA (e.g., residential yield analyses etc.) please get in touch.

Furthermore, we recommend consideration be given to the following:

 that the Future Living Code Amendment could be applied to a broader geographic area than proposed (currently limited to Cities of Unley, Walkerville, Campbelltown, Burnside & Prospect) to facilitate co-housing options in other areas that are capable to support such development.

The pattern of development across substantial parts of the City of Mitcham Council area lends itself to co-housing type development and could make a valuable contribution to the choice of housing and location closer to existing services and infrastructure.

- the notion of 'self-contained' ancillary accommodation and the challenges this
 concept might present to local authorities and nearby residents could be further
 explored and considered as a means of increasing housing choice and location,
- that the corridor living proposal for South Road (between Cross Road and Edwards Street) be reconsidered in light of traffic volume and constraints imposed by the Tunnel Overlay Code Amendment, and
- that GARP should include specific targets, goals & outcomes for housing diversity within both new and existing neighbourhoods, not just master planned communities.

SUMMARY

We acknowledge the GARP is being delivered some two years after implementation of the new system and that parts of the system are yet to play out in full such as 'Infrastructure Schemes' which have the potential to drive and support growth in new ways.

We are also mindful there may be further changes proposed by the Government following eg the Planning System Implementation review recently conducted by and Expert Panel, as well as the recent Parliamentary Inquiry into the Urban Forest. Both engagement processes are anticipated to have spatial implication on regional scale and strategic planning of Greater Adelaide into the future.

Nevertheless, we acknowledge, and support the Government and Commission's approach to commencing this work now, and the effort to ensure delivery of all four key planning instruments under the *Planning, Development and Infrastructure Act 2016* – namely the State Planning Policies, Regional Plans, Planning and Design Code and Design Standards.

Our submission has been prepared with input though sub-regional workshops with neighboring councils (facilitated by PlanSA) and with input from a range of business areas across the City of Mitcham to ensure the submission reflects all areas of council interest which play a role or are influenced by the planning system.

It has also been prepared noting that the City of Mitcham has invested heavily in strategic planning and the implementation of that strategic work over an extended period. As such, our observations on the discussion paper are provided with this in mind, and with the request that council's efforts be appropriately and specially reflected through the draft GARP once released for consultation.

The City of Mitcham's approach to planning reform and change has been a collaborative one with various Ministers, Government Agencies and the State Planning Commission over an extended period. As such, we look forward to continuing this positive relationship and welcome the opportunity to participate in further dialogue and engagement as the new GARP takes shape.

Should you require any further information please don't hesitate to contact Alex Mackenzie, Manager Development Services on

Yours sincerely

Dr Heather Holmes-Ross Mayor

Z Alolmes Doss

Enc. Attachment A - Spatial Vision for the City of Mitcham (endorsed 26/02/2019) Attachment B - Melrose Park Employment Land Study (endorsed 23/08/2022)

Attachment C - South Road Strategic Focus Areas (endorsed 10/10/2023)

Precinct 1: Flinders and St Mary's a global market. regional links and a large daily influx of visitors live, recreate, stay, study and work **U**RRBRAE CUMBER **NETHERBY** PARK **Precinct 2: Goodwood and Daws Roads** ARENCE KINGSWOOD **STBOURNE** GARDENS PARK supporting the ability for residents to 'age in place' C1 C2 C6 SPRINGFIELD C4 LOWER COLONEI MITCHAM LIGHT MITCHAM GARDENS **BROWNHILL CREEK** EROSE CLAPHAM **Precinct 3: Blackwood Centre** ARK DAW PARK ORRENS PARK 2 a diversity of housing choices nearby A range of transport options and improved amenity for pedestrians NOTIVNY. **CRAFERS WEST Precinct 4: Belair Road Centre** PANORAMA PASADENA **T MARYS BELAIR Precinct 5: Goodwood and Cross Roads** EDEN HILLS developments providing employment opportunities 1 the Flinders and St Mary's precinct GLENALTA BLACKWOOD **South Road** · Opportunities unknown at this stage DFORD PARK A Possible tram routes **HAWTHORNDENE** Possible removal of rail freight **BELLEVUE UPPER STURT** Possible Southern link road **HEIGHTS** Improved links to Marion and Blackwood E Extension to Tonsley Line rail link CRAIGBURN **Limited Change** COROMANDEL VALLEY Small scale, incremental change C6 Special character area - Springfield C1 Special character area - Hills 1 Special character area - Cumberland Park C2 Special character area - Hills 2 Special character area - Westbourne Park C3 Special character area - Hawthorn C9 C4 Special character area - Brownhill Creek (no change) C5 **Shaping Our Future** Special character area - Mitcham

- · A driver of the state's economy with health and education facilities that are competitive in
- · A renewed vibrancy in and around a world renowned innovative precinct with strong
- · A variety of housing, services and leisure offerings for a diverse demographic
- · A distinctively leafy and green environment for our community, students and visitors to
- · A regional hub that benefits from and supports alternative modes of transport
- · A region focussed on the physical and mental wellbeing of its community based on
- · A recongised destination that is sensitively integrated into the existing community, with small-scale commercial ventures that support the community
- · An area driven by innovation and diverse solutions where accommodation, allied health and medical and other services support a mix of generations
- · A strategically located opportunity area in close proximity to the Southern Innovation District and a direct route between it and the City of Adelaide.
- A strong identity as a unique hills destination supported by clear physical and cultural focal points and a broad range of services, leisure and lifestyle offerings
- · A walkable main street made vibrant both day and night by attracting visitors and offering
- · Expanded opportunities for new and existing commercial development
- A vibrant commercial centre with diverse housing options
- · A walkable strip with access to places that support economic, cultural and civic amenities

- · A flexible, activated space with a mix of housing choices and fine grain mixed use
- · A recognisable pedestrian friendly node enlivening a key movement/transport approach to

Major employment, education, research and innovation precinct

Special character area - Hills 3

Historic conservation areas





Melrose Park Employment Land Study

City of Mitcham

24 | 11 | 2021









© SGS Economics and Planning Pty Ltd 2021

This report has been prepared for City of Mitcham. SGS Economics and Planning has taken all due care in the preparation of this report. However, SGS and its associated consultants are not liable to any person or entity for any damage or loss that has occurred, or may occur, in relation to that person or entity taking or not taking action in respect of any representation, statement, opinion or advice referred to herein.

SGS Economics and Planning Pty Ltd ACN 007 437 729 www.sgsep.com.au

Offices in Canberra, Hobart, Melbourne, and Sydney, on Ngunnawal, muwinina, Wurundjeri, and Gadigal Country.

Contents

1.	Introduction	5
	1.1 Overview	5
	1.2 Project context	5
	1.3 Structure of this document	7
2.	Background review	8
	2.1 Overview	8
	2.2 Subject Area context	8
	2.3 The North South Corridor	9
	2.4 Policy and Strategy review – State	9
	2.5 Employment land definition	11
	2.6 Policy and Strategy review – City of Mitcham	11
	2.7 Policy and Strategy review – Other	12
	2.8 Key employment land trends	13
3.	Current employment profile	20
	3.1 Overview	20
	3.2 Data and approach	20
	3.3 Corridor catchment employment	21
	3.4 Comparative advantage in the South Road Corridor	23
	3.5 Summary	24
4.	The strategic role of the Subject Area and Precinct	25
	4.1 Overview	25
	4.2 The theory of comparative advantage	25
	4.3 South Australia's Strategic Growth Sectors	26
	4.4 Inter-industry linkages, the value chain, and Strategic Growth Sectors	26
	4.5 Inter-industry linkages in South Australia	27
	4.6 Case study: Monash (Victoria)	29
	4.7 Summary	30
5.	The population-serving role of Melrose Park and the wider corridor	31
	5.1 Overview	31

	5.2 Population-serving jobs across Adelaide	31
	5.3 Conclusion	33
6.	Future demand for employment land	34
	6.1 Overview	34
	6.2 Employment by ANZSIC, 2016 and 2036	34
	6.3 Broad Land use Categories	37
	6.4 Change in employment by Broad Land use Category	39
	6.5 Conclusion	39
7.	Issues regarding the rezoning of employment land	41
	7.1 Overview	41
	7.2 The 'highest and best use' (HBU) argument	41
	7.3 Housing affordability	42
	7.4 Improved amenity in surrounding areas	42
	7.5 Impact of rezoning on adjoining employment lands	43
	7.6 The precautionary principle (option value)	43
	7.7 Employment lands' role in value translation	44
	7.8 Land 'surplus to requirements' given plans for other parts of the precinct	45
	7.9 Case studies: employment lands in inner Sydney and Melbourne	45
8.	Summary	48
	8.1 Overview	48
	9.2 Stratagic directions 9 actions	40

1. Introduction

1.1 Overview

Since late 2016 Council has progressed a series of related land use planning initiatives, including:

- Spatial Vision for the City of Mitcham
- Structure Plans for identified growth areas
- A Growth Areas Development Plan Amendment
- A Character Areas Development Plan Amendment

The structure planning work, which was completed in February 2019, identified the need for further analysis of existing employment land at Melrose Park. Specifically, the structure plans noted:

"Minimal change to existing industry and commercial areas [in Melrose Park] until the north-south corridor design is resolved. Reassess land uses and development options after this. Residential / supported accommodation incursions not supported at this time"

A project map for the proposed T2D (Torrens to Darlington) South Road upgrade was released by the State Government in June 2021 and work by DIT on this project continues at pace, including necessary land acquisitions.

This report looks to progress economic analysis investigations that are intended to inform the next stage of Council's land use planning initiatives as they relate to employment land at Melrose Park.

1.2 Project context

Employment land at Melrose Park forms part of a wider area zoned as Strategic Employment Land (SEL) under the Planning and Design Code. This area of SEL also includes part of Edwardstown, which falls within the boundaries of the City of Marion. A Land Supply Report for Greater Adelaide, released by the State Government in June 2021, identifies this area of SEL as the 'South Road Corridor – Central' key employment precinct within Metropolitan Adelaide's inner south.

Leaving aside hospital and university precincts, this is the largest tract of contiguous employment land in the City of Mitcham. It benefits from an adjacency to the intersection of South Road (north-south connector road) and Daws Road (east-west connector road). The northern and eastern boundaries of the Melrose Park employment land abut established residential land.

Emerging plans for the T2D upgrade to South Road illustrate significant medium to long-term improvements to Adelaide's primary north-south transport corridor, both in terms of movement above and below ground. Once complete, the upgraded north-south corridor will alter the economic geography of Adelaide, generating a range of new economic opportunities, and presenting a range of land use planning challenges. The challenges associated with competing objectives for urban land are

particularly evident in areas such as Melrose Park, where employment land abuts relatively residential areas whose underlying land values are significant and rising.

We understand that this analysis will aid Council in making recommendations or submissions to the State Government on current and future land use planning in this area, which may or may not involve the introduction of a greater mix of uses (including residential). We also understand that this analysis will aid Council in discussions with landowners or investors and in the identification of future opportunities for public-sector investment that may support future growth in this area.

It is noted that the City of Mitcham owns and operates a works depot at the eastern end of the employment land that is the subject of this report.

For clarity, the economic analysis underpinning this report interrogates data that applies to the Melrose Park / Edwardstown SEL as a whole. We recognise however that Council's Subject Area for the purposes of current land use planning discussions is set out in Figure 1.



FIGURE 1. MAP OF THE SUBJECT AREA

Source: City of Mitcham

1.3 Structure of this document

Chapter 2 provides a summary of the objectives of the document, including the regional context, a summary of relevant planning documentation and a review of key employment land trends.

Chapter 3 draws on small area data to set out the present employment profile for the precinct.

Chapter 4 sets out the strategic importance of the precinct, with reference to state planning strategies and its location within the metropolitan system

Chapter 5 describes the population-serving role of the precinct

Chapter 6 sets out employment projections for the precinct, showing how growth in employment is likely to flow through to increased demand for employment floor space

Chapter 7 provides a summary of the key issues associated with the rezoning of land from employment land to residential land, including case studies from interstate

Chapter 8 sets out some potential strategic directions and associated actions for Council to implement to realise the full potential of the precinct

Background review

2.1 Overview

This section provides a summary of the project context, including key geographical and locational attributes, relevant state and local policies, and an overview of the trends likely to shape land use in the Subject Area and precinct in future decades.

2.2 Subject Area context

This section sets out the geographical context of the Subject Area, assessing its attributes and key features across different geographical scales.

Metropolitan context

The Subject Area is located in Greater Adelaide, approximately nine kilometres south of the Adelaide CBD, and is highly accessible to the South Road Corridor. Ongoing investment in the North-South Corridor is likely to lead to continue to shape land use at the Subject Area, providing improved access to other parts of the metropolitan area. With the majority of employment land in Adelaide situated in the city's northern and northwestern suburbs, it forms part of the second-largest employment precinct south of the CBD (after Lonsdale).

Regional context

The region surrounding the Subject Area is dominated by residential development. The region to the east (in the City of Mitcham) is one of the most sought-after residential areas in the metropolitan area, with comparatively high residential land prices generating pressures for rezoning to permit other land uses. To the south is a major education institution (Flinders University), a major hospital (Flinders Medical Centre), and the Tonsley Innovation District. The Subject Area is also located close to the Repat Health Clinic, while Castle Plaza is a major centre accommodating a range of retail and population services.

The site has good access to the national highway network via the South Eastern Freeway (9kms to the north-east), and global markets via Adelaide Airport and Outer Harbor (each of which are readily accessible via the North-South Corridor).

Local context

The Subject Area (shown on page 56) is located to the east of South Road, with Daws Road marking its southern boundary. The precinct at present accommodates a wide mix of uses, including trade supplies, storage facilities, small scale manufacturing, showrooms, construction supplies, automotive repairs, online sales distribution, and engineers among others.

The Subject Area differs from the balance of the precinct in a number of important ways:

- It comprises a range of lot sizes that are in general more diverse in terms of their size than elsewhere in the broader precinct.
- It is deeper and extends further back from South Road than the majority of employment land on the eastern (City of Mitcham) side of South Road. The degree to which the site is 'set back' from South Road is shown by the red line marking its western edge, which reflects the extent of setback for employment lands to the north and south of the subject site.
- It is closer to urban amenity in the form of Winston Avenue cafes and hospitality businesses.

These differences are important as they indicate a potential point of difference for the precinct going forward.

2.3 The North South Corridor

As discussed, the Subject Area is situated within a precinct that sits adjacent to South Road, metropolitan Adelaide's primary north-south road link. Works to enhance this corridor commenced more than a decade ago, with the Northern Expressway completed in 2010. The overall project comprises a number of smaller subprojects which are scheduled to be completed in stages to minimise disruption and spread project costs. The section most directly applicable to the subject site is the Darlington to Anzac Highway component. This section alone will be funded by the State and Federal Governments at a total cost of nearly \$5.5 billion.

The overarching purpose of this major infrastructure is to reduce drive times across the Greater Adelaide road network, and in doing so, generate quality of life improvements for users, and boost the productivity of the South Australian economy, reducing the cost of doing business in South Australia by reducing time costs and vehicle operating costs that would otherwise be incurred by local businesses.

The completed road will provide an important contribution to South Australia's 'value proposition' in strategic sectors by bringing employers closer to workers, suppliers closer to customers, and exporters closer to global markets. In doing so, it will help to underpin the expansion of existing businesses, and the creation of opportunities for new businesses in South Australia.

2.4 Policy and Strategy review - State

This section provides a summary of select State Government documents, describing how they seek to shape land use in the Subject Area and surrounding region.

30-Year Plan for Greater Adelaide

In 2017, the 30 Year Plan for Greater Adelaide was updated. The purpose of this strategy is to shape provide a framework for long-term, strategic planning to guide the growth of Greater Adelaide into the future. The plan refers to the need to 'unlock opportunities' through the development of new infrastructure, including the Darlington interchange, which will improve connectivity between Tonsley (and areas to the north, such as the precinct) and Flinders Medical Centre and University.

Specific policies that relate to manufacturing in general include:

- Support and promote defence, science and technology clusters ensuring they are linked by high quality road, rail and telecommunications infrastructure and connect to universities (P67)
- Focus business clusters and manufacturing hubs around key transport infrastructure such as road, air, rail, sea terminals and intermodal facilities to maximise the economic benefits of export infrastructure. (P68)
- Create sufficient buffer activities and design guidelines to prevent manufacturing and defence lands being lost to encroachment by residential activities and to prevent landuse conflicts between these activities. (P69)

In relation to 'green industries':

 Ensure planning controls for employment lands are flexible to allow new green technologies and industries to emerge and grow.

And finally, in relation to employment lands:

 Provide sufficient strategic employment land options with direct access to major freight routes to support activities that require separation from housing and other sensitive land uses.

The Plan also sets out the following relevant actions:

- Prepare guidelines and accompanying planning policies for employment lands (including industrial, defence and agri-business uses) to identify those areas that:
 - require protection from incompatible development
 - may evolve to more mixed-use employment
 - may require expansion
 - may transition to other land uses, including residential. (This will require the management of interface issues with adjacent sensitive land uses and the management of any site contamination)

Growth Management Program Land Supply Report for Greater Adelaide (Part 3: Employment Land)

Part 3 of the Land Supply Report (LSR) for Greater Adelaide focusses on employment land. The document provides information on the supply, demand, and industry types of employment land as well as projected jobs growth to 2030.

Implications:

Employment lands in Greater Adelaide are currently concentrated in the Northern regions with very little supply (under 2%) in the Inner South where the subject site is located. The Inner South comprises five key employment precincts. The Central South Road Corridor precinct (in which the subject site lies) is the largest area of total zoned land and provides the most employment in the Inner South region. To facilitate forecast employment growth, maintaining this land is critical.

Analysis identifies the precinct and the wider Inner South region as having comparative advantages in knowledge intensive and population serving activities due to the local pool of skilled labour. By 2030, population serving activities are projected to account for a large portion of total employment within the Central South Road Corridor, but manufacturing is expected to continue playing an important role. The LSR iterates the significance of the North South Corridor for employment land within this region, highlighting that its completion may drive demand for manufacturing and freight and logistics activities, but small lot sizes pose a constraint. As of June 2020, there was estimated to be eight hectares of vacant employment land in the Inner South, of which 1.2 hectares was in the Central South Road Corridor.

2.5 Employment land definition

This document uses the same definition for employment land as is set out in the Land Supply Report for Greater Adelaide (2021). From that document:

"Historically, the term 'industrial land' was used to describe land providing employment outside of the activity centre network1, the Central Business District (CBD) and institutional uses (i.e. schools, universities and hospitals). In times where manufacturing made up a significant proportion of total employment in South Australia (and absorbed a substantial quantity of demand for employment lands), use of this terminology was entirely warranted.

In recent years, however, the range of activities taking place within these precincts has evolved from traditional manufacturing. In recognition of this, the term 'employment land' has emerged as a more appropriate term to classify these formerly 'industrial' precincts. Referring to these precincts as 'employment lands' more accurately reflects and characterises their role and function as locations for jobs across a wide range of employment sectors."¹

2.6 Policy and Strategy review – City of Mitcham

This section provides an overview of local government policies and strategies associated with the Subject Area, the broader precinct, and the surrounding region.

Spatial Vision for the City of Mitcham

Council's Local Area Planning project ran for two years from 2017 to 2019. The purpose of this project was to spatially translate Council's Strategic Management Plan onto a map of the City (i.e., a 'Spatial Vision'). Structure Plans were also drafted for key growth precincts identified through the Spatial Vision exercise.

The Melrose Park employment land falls within Precinct 2 of the Spatial Vision, which stretches across a large tract of land from South Road in the west to Eliza Place, Panorama in the east. In addition to the employment land at Melrose Park it also encompasses the Repat Health Precinct, Bedford Industries, the (now demolished) Panorama TAFE site, Centennial Park Cemetery and Pasadena Shopping Centre.

¹ Land Supply Report for Greater Adelaide - Employment Land (plan.sa.gov.au)

The Spatial Vision outlined a number of opportunities for significant change in this precinct. These include supporting the ability for residents to 'age in place' with provision for a mix of generations. It is also noted that this precinct is "a strategically located opportunity area in close proximity to the Southern Innovation District [Tonsley] and a direct route between it and the City of Adelaide".

The Structure Plans sought to build on the Spatial Vision as a way of illustrating how this Vision might be implemented in the future. In a general sense, structure plans are useful in guiding investment, development, and land use change in order to achieve desired outcomes for an area. The structure planning process included workshops with community members, landowners, developers, local business owners, Elected Members and Council staff. The result of this structure planning process for the eastern end of Precinct 2 (i.e., the Melrose Park employment land) was a determination that there should be "minimal change to existing industry and commercial areas [in Melrose Park] until the north-south corridor design is resolved. Reassess land uses and development options after this. Residential / supported accommodation incursions not supported at this time"

Implications:

This policy recognises the strategic importance of the Subject Area, referencing opportunities in health and medical industries, and connections to the institutions to the south and the CBD. It also made clear that there was (at the time) insufficient justification to support change in land use.

Mitcham 2030

The strategy presents Council's long-term aspirations for the community going forward to 2030. The plan considers the City of Mitcham's current profile and community values as well as future opportunities and challenges.

Implications:

Goal 3 outlined in 'Mitcham 2030' is articulated as "a strong and competitive economy that supports our unique and vibrant places and culture". Mitcham City Council has a role to play in ensuring local employment and a healthy economy for its residents. One of Council's key tools for ensuring this is maintaining employment lands within the LGA. It is therefore vital that land be confirmed as 'surplus to requirements' prior to any rezoning.

2.7 Policy and Strategy review - Other

Tonsley Innovation District (City of Marion)

The Tonsley Innovation District is a mixed-use precinct located south of the subject site along South Road in the neighbouring City of Marion. Tonsley is situated on a 61-hectare site around 10kms to the south of the Adelaide CBD.

The main role of the precinct is in facilitating high-value manufacturing; however, the site also includes education and training facilities, retail and civic space, and residential development. Under the umbrella of high-value manufacturing, the work conducted at Tonsley sits within four sectors reflecting the South Australian context. The four sectors are:

cleantech and renewable energy,

- health, medical devices and assistive technologies,
- mining and energy services, and
- automation, software and simulation.

Implications:

The City of Marion is positioning itself as an innovative and technology focussed community which can offer an expanded range of employment opportunities for residents of the broader region. Tonsley is likely to continue attracting skilled workers and business investment to the southern region of Adelaide.

Whilst Tonsley is likely to be a focal point for knowledge-intensive, advanced manufacturing, the precinct is influenced by the existence of Flinders University, a TAFE building, and (soon) around 800 dwellings in the north-western corner of the site. These sensitive uses complement the set of activities occurring there. Their existence does however limit the potential for externality-generating activities at the site, a fact that serves to underscore the importance of more 'traditional' employment lands to the north.

Revitalisation of the Edwardstown Employment Precinct (City of Marion)

The City of Marion is currently embarking on a project to revitalise the Edwardstown Employment Precinct in terms of its access, amenity, and activation. According to Council documentation, the Precinct currently provides over 4,500 jobs and accommodates 1,800 businesses.

Implications:

This project aims to foster local employment in the region through a range of measures. Considering the Precinct's proximity to the subject site, co-benefits are likely to exist as more businesses and workers are attracted to the area at large.

It is also important to recognise that the provision of opportunities for employment growth at Edwardstown do not obviate the need to foster opportunities elsewhere in the corridor. It may well be the case that Edwardstown's employment lands do not fit the specific needs of businesses seeking to locate within the region, and that they prefer the attributes of land on the eastern side of South Road. Further, if employment projections indicate that Edwardstown alone cannot accommodate forecast growth in employment and economic activity, then the region to the east of South Road must have a role to play if the regional economy is to reach its potential.

2.8 Key employment land trends

A number of macro-economic and more localised trends have and will continue to impact on the Subject Area, and Greater Adelaide employment lands more generally. These trends represent a mix of threats that must be managed over time, and opportunities for planners to build on existing regional strengths and capabilities through well thought out strategic planning. The following section reflects on some of the most relevant.



A transition from a manufacturing to a services economy

The past thirty years have seen a profound restructuring of the Greater Adelaide economy, with increasing global trade and a redeployment of the state's human and physical capital into the production of (largely knowledge-based) goods and services. This structural change has had significant impacts on the composition and location of employment across the metropolitan region.

Employment in manufacturing (as traditionally defined) will likely continue to decline, however a growing share of Australia's manufacturing output will leverage the knowledge of its labour force to drive activity in 'smart manufacturing'. This reality creates opportunities for suburban university campuses with nearby employment lands in particular (such as Macquarie University in Sydney, Monash University in Melbourne, and Flinders University in Adelaide). On the other hand, employment in professional and financial services will increase. A range of population serving industries will also expand, including health care, retail, and education.

Knowledge-based industries encompass research and development (R&D), design, engineering, marketing, advertising, and creative industries, as well as more traditional jobs such as lawyers, bankers, financiers, doctors, and management consultants. Many of these activities overlap with production and manufacturing and could present growth opportunities for the sector. This is particularly so as more hybrid roles emerge with technological advancements, allowing for movement up the value chain (e.g., rapid prototyping, 'customise-make-service-sell').

This transition to high value production and advanced manufacturing technologies presents a significant opportunity for employment lands with favourable locational attributes to redirect their activities towards the more knowledge-intensive forms of manufacturing, while the provision of services (much of which takes place on employment lands) will increasingly drive demand for employment land at an aggregate level.

Implications for City of Mitcham

The shift in demand for land from manufacturing to services uses is likely to impact some employment lands more than others. In Mitcham's case, its land is situated close to major health and educational institutions, is close to educated worker pools, is close to freight routes, and has good access to Adelaide Airport. In addition, the relative lack of land suitable for employment land-based population-serving businesses in this part of Adelaide is likely to support the ongoing provision of these activities here.

Leveraging the overlap of complementary industries

Future innovation will increasingly come from the intersection of different industries. This is illustrated in the 'Stretch and Leverage' concept. This is an economic development framework that focuses on the expansion and interaction of existing industries to create new opportunities.

Stretching involves expanding existing resources, infrastructure, and core competencies of an industry sector (e.g., building on the strengths of existing sectors and industries)

The leverage approach leverages resources between industries to create new hybrid industries in white space between industry sectors.

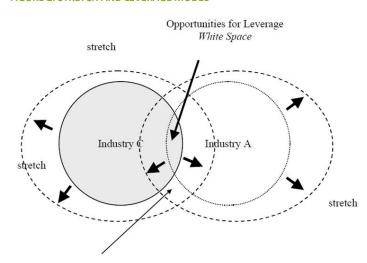


FIGURE 2: STRETCH AND LEVERAGE MODEL

Stretch and Leverage

This white space is where new opportunities for industry attraction and establishment may arise. In enterprise corridors, with their often highly diverse industry mix, the opportunity to stretch and overlap seemingly separate industries is high. Supported with a diversity of floorspace and built form types, and often lower rents, a very fertile economic ecosystem to explore and identify white spaces is created. Such a model would require curation of relationships and/or an already diverse employment land ecosystem with strong existing supply chains.

Implications for City of Mitcham

For the catchment and broader South Road Corridor, an obvious application of this concept is the opportunity for collaboration between established industry sectors and education, technology, and health providers to the south and east (Repat Health Precinct).

An ageing population and an increasing focus on health and med-tech

Across many developed economies such as Australia's, an ageing population presents the twin challenges of the need for increased expenditure on health-related services and a relative reduction in the number of working-aged people in the labour market.

As a consequence of this, and the current COVID-19 pandemic, there has been an increased focus in bio and medical technologies. These industries have strong links to R&D and knowledge intensive sectors and are often the domain of 'Innovation' or 'Health and Education' Precincts in centralised locations in inner urban areas.

However, many of these industries require facilities to translate research through fabrication, and Australia generally lacks demonstrated capabilities in the commercialisation (the scaling up) of R&D developed domestically. These operations tend to seek locations proximate to universities, major

hospitals, and medical research institutes. In this sense the presence of a major university and hospital immediately adjacent to the South Road Corridor represents a significant opportunity.

Implications for City of Mitcham

The land within the precinct is well-situated for a health and medical focus, being proximate to both a major hospital and university. This represents a significant opportunity for the City of Mitcham to leverage its location close to Flinders University and Medical Centre to support growth in health and medical industries — recognised as one of South Australia's nine Strategic Growth Sectors.

Capturing locally created wealth to develop innovative and localised supply chains

While economic activity has been growing in Australia, in many places its contribution to the local community through providing secure employment and small business opportunity is limited. A key aspect of building an inclusive economy is a change of mindset. We must think not only about what we can attract or construct through external investment, but about what we already have and how to leverage supply chains and existing knowledge better.

The distribution of wealth (who owns land, businesses, technology etc) is a critical policy issue. If a local economy can distribute wealth to more of its residents through support of small businesses and local enterprises, this will have positive flow-on impacts. Wealth will be retained within the local economy, instead of being sucked back out through profits and dividends to remote/external stakeholders.

Support for local industries, local innovation and local enterprise is a critical, and often underrespected, component of precinct development. Locally owned businesses are far more likely to:

- Be committed to the local area and retain wealth (profits) within localities
- Create effective local economic multipliers and recirculate local income by using local suppliers and local workers
- Bring greater social returns, and
- Build long-lasting prosperity

Large companies and institutions have an outsized role and responsibility in community wealth building. The term 'anchor institutions' is used to refer to organisations which have an important presence in a place, usually by virtue of being large scale employers, the largest purchasers of goods and services in the locality, overseeing large areas of land and having relatively fixed assets. Examples include universities, large local businesses, hospitals, and training organisations.

Anchor institutions are a form of 'sticky capital,' maintaining long-standing community and social connections and enduring community development capacity but which are unlikely to close down or relocate from their community. They play an important role in community wealth-building due to their capacity as large employers, their sizeable procurement spending, infrastructure (including land and facilities) and assets. Because of their engagement in national and global markets, anchor institutions play important roles in linking broader macroeconomic developments with hyperlocal issues to create opportunity, prosperity, and inclusive growth.



Community wealth building is about public service. Anchor institutions and businesses can work together in a locality to produce positive outcomes which are often 'more than the sum of their parts'. For the Enterprise Corridor, this does not mean that all economic activity remains local, but instead, seeks to maximise the creation of value through the concerted development of localised supply chains in order to enable those businesses to operate more efficiently, benefit from the principles of agglomeration and build products and services for export (domestically and internationally) that are better because of the existence of such partnerships.

Implications for City of Mitcham

The precinct represents an opportunity to link in with activities occurring to the south – broadly, in the hi-tech sector and in health and medical industries – so that more activities up and down the value chain are occurring within South Australia, and that consequently, a greater share of wealth is captured within the local economy.

COVID-19 and the exposure of global supply chain risk

Current events are causing Australia to rethink our role in global supply chains and in particular the COVID-19 crisis has highlighted the fragility of global supply chains. The current geo-political tensions between Australia and China have also informed a re-think of what trade, production and consumption may look like domestically in the future. This has implications for how South Australia, and South Australian industries, view themselves with respect to global supply chains. Where not long ago we saw our role as an increasingly service-providing economy who also exported raw or semi-processed commodities to international markets, exposure to the disruption of global supply chains and the risks of having critical imported goods (for example vaccines) at the mercy of these disruptions, has encouraged business and government to reconsider this arrangement.

While South Australia will not go back to its manufacturing heights of the post-war years, there is an increasing opportunity for the state to reconceptualise its role in the global supply chain. This may be through the retention of certain value-adding process to products before export, through the 'reshoring' of certain high value product manufacturing, or the exporting of advanced manufacturing processes and products to leverage the intersection between the highly skilled services sector and advanced manufacturing.

Implications for City of Mitcham

With increased awareness of the risk associated with globally dispersed supply chains, there is potentially an opportunity to capture a greater share of activities associated with South Australia's growth industries to be retained locally. This requires the ready availability of a diverse set of land types in the vicinity of key institutions.

Growing understanding of the role of employment lands in generating agglomeration economies

The concept of agglomeration economies refers to the benefits derived through facilitating better connections between businesses in a metropolitan region.

The strength of agglomeration economies in any city is often proxied through the use of the Effective Job Density (EJD) tool. An EJD 'score' can be calculated for any small area by taking the number of jobs in that area — an indication of the intensity of economic activity — and adding all the jobs in other areas reachable from that location, divided by the travel time to these other locations. EJD is therefore influenced by both the spatial concentration of businesses and the efficiency of the transport system.

Research shows a strong link between agglomeration (as measured by EJD) and productivity, showing that a doubling of EJD is associated with a boost in productivity by around 8 per cent. In other words, 8 per cent value is added in wages and salaries, profits, and taxes by virtue of a business operating in a denser and better-connected location. For knowledge intensive, high value-added industries such as advanced manufacturing, biotechnology, and technical and scientific services, the productivity from a doubling of EJD is shown to be even higher, often upwards of 14 per cent.

Adelaide's economic geography features a relatively low EJD compared to other Australian cities. This is partially explained by the fact that Adelaide is smaller. However, a lack of spatial concentrations of employment, our high car dependency and resulting traffic congestion dampen agglomeration in this state, and therefore the productivity of our businesses, compared to their interstate counterparts. A range of land use planning policies and tools can influence the extent to which the Adelaide metropolitan area and other regions in South Australia might optimise the economic advantage from agglomeration. These include activity centres policy, the management of employment lands and the treatment of home industries

Implications for City of Mitcham

Mitcham's employment lands are situated within a corridor comprising Flinders University, Flinders Medical Centre, and Tonsley. There are clear linkages between activities at these locations and the surrounding region. By ensuring the availability of land nearby and easily accessible via the arterial road network, agglomeration economies can be supported, which will in turn drive productivity benefits across the wider economy.

The increasingly important role of 'amenity' in employment lands

Historically, employment lands have tended to locate and cluster in areas relatively distant from significant population centres, adjacent to busy road corridors, and accessible to blue collar worker pools. In an era where manufacturing was the dominant activity within employment lands, and where legislative protections from emissions were far lower than they are today, this made sense. In parts of Adelaide – notably the sweep of land north of Grand Junction Road between Gillman and Cavan – employment lands are still noisy, odorous, and generally unappealing places to be.

However, with a growing share of activity taking place in employment lands linked to educated, white collar workers, there is a growing requirement for amenity in many. For highly-skilled workers in employment lands at Technology Park at Mawson Lakes, and at Monash and parts of Dandenong South in Melbourne, employment lands are being developed with green spaces and access to retail and hospitality; recognising that local businesses are competing for talent in a global marketplace.

With a growing quantity of employment land activity in knowledge-intensive sectors, delivery of high amenity employment lands represents a significant competitive advantage for South Australia.

Implications for City of Mitcham

The shift in the way employment land is used means a related shift in the types of workers within them. In the competition with other Australian and Asian cities for economic activity, the look and feel of a precinct is increasingly important. The precinct already enjoys good access to high-value residential areas, retail, and transport infrastructure, so to some extent many elements of high amenity are in place.

Many parts of the precinct have a 'look and feel' that reflects the region's history as a 'traditional' employment land precinct, a fact that will continue to inhibit the expansion of skilled employment. This highlights the need for City of Mitcham to take an active role in fostering ongoing improvements to precinct amenity as it continues its transition.

Current employment profile

3.1 Overview

This section sets out and discusses the current employment profile of the precinct. The analysis is drawn from small area employment data, which is itself drawn from 2016 Census data, and shows the breakdown of employment within section of the South Road Corridor between Sturt Road in the south and Cross Road to the north. Given the lack of sufficiently fine-grained data, it is not possible to reasonably estimate the employment profile of the Subject Area in isolation.

3.2 Data and approach

As discussed, SGS has generated these profiles using small area employment estimates derived from 2016 Census data. These small area estimates have been arrived at using an approach that has converted employment from larger Destination Zones to a number of smaller zones, as shown in the figures below.

Clearly, at the end of an intercensal period, these figures are somewhat out of date. That said, the mix of employment is not likely to have changed significantly over the past five years, so the 2016 Census results can be understood to represent a reasonable reflection of the present situation. Small area employment projections were carried out in 2019, and take into consideration future infrastructure commitments, including the South Road Corridor.

As discussed, the focus of this context analysis is on the section of South Road between Sturt Road and Cross Road, looking at employment land on both the Marion and Mitcham sides. The area has broken into four sub-precincts. These are shown in Figure 3.

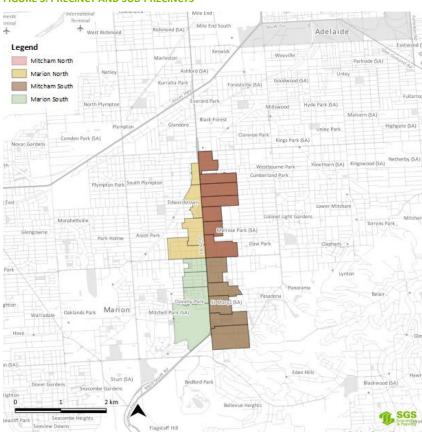


FIGURE 3. PRECINCT AND SUB-PRECINCTS

Source: SGS Economics and Planning

3.3 Corridor catchment employment

The following charts show the breakdown of employment across the precinct in 2016, broken down by broad employment category, and compared to Greater Adelaide's aggregate employment lands.

The employment data shows that nearly half of all employment land jobs in the precinct are in 'population serving' sectors, with 'traditional' employment uses the next most important category. When compared to Greater Adelaide, key differences are in the share of population serving jobs (49% compared with 42%), and the relatively low share of freight and logistics jobs (3% in the catchment compared with 9% across Greater Adelaide².

The high proportion of jobs in population serving sectors demonstrates the role this part of South Road plays in providing products and services that support the retail and service demands of the surrounding

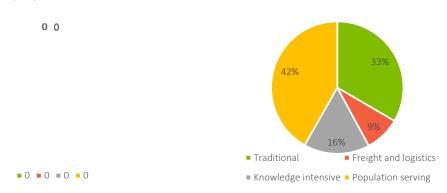
SGS ECONOMICS AND PLANNING: MELROSE PARK EMPLOYMENT LAND STUDY

² Breakdown of jobs by BJC

population. Typically, these employment patterns emerge in urban regions where employment lands are relatively scarce, as they are in Adelaide's inner southern suburbs.

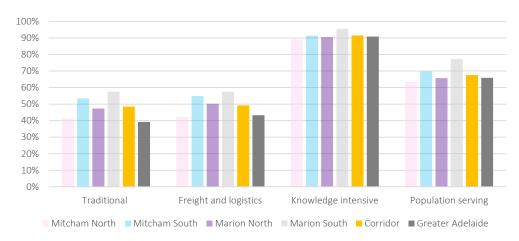
The low share of employment in freight and logistics is a consequence of the unsuitability of the precinct for these uses relative to areas in the northern and northwestern suburbs. While the corridor is relatively well-located relative to producer regions and trade gateways, the volume of traffic on South Road presents access challenges for larger vehicles in particular.

FIGURE 4. SHARE OF EMPLOYMENT LAND JOBS BY BROAD INDUSTRY SECTOR, CATCHMENT (LHS) VS GREATER ADELAIDE (RHS)



The figure below sets out the share of white-collar jobs in the precinct and each of the sub-precincts with the metropolitan Adelaide share. The figure shows that the share of white-collar employment across all sub-regions is greater than the share for Greater Adelaide. This reflects the service-focus of the precinct, its accessibility to a relatively highly skilled workforce, and its location proximate to Flinders University, Flinders Medical Centre and Tonsley.

FIGURE 5. SHARE OF WHITE-COLLAR JOBS BY BROAD INDUSTRY SECTOR



As discussed in the previous section, there is a shift in the way employment land is used, with growing mechanisation and technology reducing the quantity of lower-skilled jobs, and with Australia's relatively

skilled workforce supporting the expansion of knowledge-intensive manufacturing. In addition, a shift toward the provision of services is also leading to changes in the worker profile of employment lands. This means that the share of total employment land jobs in white collar sectors is likely to rise.

3.4 **Comparative advantage in the South Road Corridor**

The Metropolitan Growth Management Program (MGM) provided a supply report for Greater Adelaide's employment lands. Among other things, this report compared the mix of employment (by broad industry category) to the Greater Adelaide average to determine whether the prevailing industry mix provided evidence of a 'comparative advantage in a particular set of activities.

The table below shows the relative strength of employment land precincts in this part of Greater Adelaide in 'knowledge intensive' and 'population-serving' activities.

FIGURE 6. COMPARATIVE ADVANTAGE FOR 'INNER SOUTH' PRECINCTS

	STRATEGIC ACTIVITIES			Population	
PRECINCT	Traditional	Freight and Logistics	Knowledge Intensive	Serving	
Somerton Park					
South Road Corridor - North					
South Road Corridor – Central					
South Road Corridor - South					
Tonsley					
Comparative advantage, among top 5 assessed precincts Comparative advantage					

No comparative advantage

Source: Metropolitan Growth Management Program, Employment Land Supply Report, Govt. of South Australia

Melrose Park is located in the 'South Road Corridor - Central' precinct and has no identified comparative advantage (as defined by the thresholds set out in the MGM). It is important to be clear on what this does and does not mean.

Firstly, the lack of a clear comparative advantage is not by definition a bad thing – it is merely reflective of a precinct with a wide range of industries. It should not be interpreted as saying that a precinct is 'without strengths', and therefore expendable. By the same token, a precinct with an evident comparative advantage is not necessarily a strong precinct worthy of ongoing protection. For example, the comparative advantage may be in a declining sector and the precinct may have high and enduring vacancies.

Secondly, this 'broad industry category' measure looks at employment across a range of industries, and across countless sub-industries. In reality, analysis carried out at such a high level may obscure clear comparative advantages at the industry (ANZSIC) or sub-industry level.

3.5 Summary

The following key points can be drawn from the above analysis.

The share of population serving jobs in the precinct is relatively high

Compared to the employment lands elsewhere in Adelaide, the precinct accommodates a relatively large share of population-serving jobs. This reflects locational characteristics that favour these uses within the Precinct. As well, the relative lack of supply of employment land in Adelaide's south means that population-serving jobs — for which demand is relatively evenly distributed across the metropolitan region — tend to be overrepresented within the region's employment land precincts.

The share of white-collar jobs is relatively high across the precinct

For each broad industry sector, the share of white-collar employment is high relative to employment lands elsewhere in Adelaide. This is particularly the case for the traditional sector (which includes manufacturing) and highlights the appeal of the Precinct for knowledge-intensive activities such as advanced manufacturing, management, and business operations.

The existing employment data reveals that the precinct already has something of a service delivery/ white collar employment focus.

The strategic role of the Subject Area and Precinct

4.1 Overview

In considering the future prospects of the Subject Area, it is important to consider its broader strategic context. To understand the role this site plays at the strategic scale, it is necessary to 'zoom out', analysing the current (and potential future) role played by the Precinct in which the Subject Area is located in the wider economy.

The employment land at Melrose Park forms a part of a larger swathe of employment land, referred to hereafter as the Precinct. It is adjacent to Adelaide's key north-south corridor, and relatively close to a major knowledge-generating institution (Flinders University) and Flinders Medical Centre. This section looks at the significance of these locational and geographical characteristics from a strategic perspective, examining the current and future role of the site and the broader precinct in supporting the state's strategic growth objectives.

4.2 The theory of comparative advantage

Comparative advantage is an economic theory that refers to the fact that, within a wider trade network, underlying conditions in some places are such that particular categories of goods and services can be provided relatively cheaply and easily. This being the case, these places enjoy a relative cost advantage in the production of these goods and services relative to other places. The corollary to this theory is that, in seeking to grow their economies as efficiently as possible, regions should:

- direct resources towards the growth of sectors in which they already enjoy an identifiable comparative advantage, and
- secure or strengthen the underlying factors that drive these comparative advantages.

Comparative advantage is usually driven by 'supply side' factors associated with key production factors (i.e., capital and labour). What this means is that a place will tend to have a comparative advantage in the provision of goods and services for which production factors are readily and cheaply sourced. The 'ease' with which a regional economy might produce a given set out outputs can be linked to the availability of production factors such as:

- Land in the right locations and configurations, with the right attributes,
- Production inputs readily available, high quality, relatively low-cost, and
- Labour in appropriate quantities, with the right mix of skills and experience.

For South Australia, economic growth and development strategies are based on growth of businesses in areas that leverage the state's comparative advantages. For Greater Adelaide and South Australia, these include:

Access to a relatively highly-skilled local workforce,

- World-class liveability meaning the state is a popular destination for skilled foreign workers,
- A well-regarded university and research sector,
- An industrial legacy that leaves the state with a bountiful supply of well-located employment land, and a supply of appropriately skilled workers,
- Agriculture and food production, and
- Access to natural resources.

4.3 South Australia's Strategic Growth Sectors

In recent years, following a period of extensive industry consultation and collaboration, the State Government launched strategies to support the ongoing growth of nine Strategic Growth Sectors (SGSs) that leverage the state's advantage in various combinations of the state's key advantages. The purpose of these strategies is to underpin the ongoing growth of the state's economy. These SGSs are set out in the table below.

TABLE 1. SOUTH AUSTRALIA'S STRATEGIC GROWTH SECTORS

Tourism	International education	Defence industry	
Food, wine, and agribusiness	Hi-tech	Health and medical industries	
Energy and mining	Space industry	Creative industries	

Source: Government of South Australia

To secure future economic growth for the state, it is therefore important to direct resources to the expansion of these sectors, and to strengthen the factors that drive the underlying comparative advantage.

As discussed, South Australia's advantages in these sectors is driven by the availability of production factors. These include skilled labour and natural resources, as well as the availability of appropriately configured land in the right locations.

The contribution of land in underpinning a region's comparative advantage can't be understated. By way of example, it is interesting to consider what might happen to South Australia's comparative advantage in defence industries if land at Technology Park and on the Le Fevre Peninsula were rezoned to other uses. Or, for example, whether our advantage in the provision of education of international students would be impacted were a cap placed on the provision of additional student apartments in the CBD.

4.4 Inter-industry linkages, the value chain, and Strategic Growth Sectors

Inter-industry linkages can be thought of as the extent to which industries are connected within a 'value chain'. This perspective recognises that the success of a particular SGS really requires depends on the

nurturing of opportunities up and down the 'value chain'. As a result, it's not sufficient to simply establish (for example) medical research capabilities, without having a full understanding of the related opportunities that exist up and down the value chain for related businesses.

For example, development of medical devices and pharmaceuticals (each of which is dealt with explicitly as opportunities for growth within the Health and Medical Industries SGS) there is obviously a need for research and development component that requires access to appropriate R&D facilities (ideally collocated with educational institutions. However, a more detailed look at a typical value chain linked to the production of, say, medical devices reveals opportunities in many more sectors both 'backwards' and 'forwards' in the supply chain.

FIGURE 7. ILLUSTRATION OF 'MEDICAL DEVICE' VALUE CHAIN



Source: SGS Economics and Planning

If a region wishes to take full advantage of its comparative advantage in a particular area, consideration should be given to economic opportunities the length of the supply chain. For example, a strategy for growing the construction sector that fails to recognise the reliance of the sector on manufacturing inputs is likely to be ineffective.

Referring to Figure 7, a strategy intended to expand the manufacture of medical devices must ensure not only that R&D activities are supported within universities and medical facilities, but also that there is sufficient manufacturing land to support the expansion, ready access to necessary raw materials, and that the efficient distribution of outputs to global markets is supported through well-located, state of the art warehousing and distribution facilities.

Besides the obvious advantages associated with capitalising fully on local comparative advantages to create new economic opportunities, an approach to economic development that seeks to support the expansion of related value adding activities within the region also helps to promote community wealth building (i.e., it optimises the capture of profits within local hands) and reduces a region's exposure to 'supply chain risk'. These issues are discussed in greater detail as part of section 2.8.

The value chain perspective allows us to see that growth of strategic sectors requires an economy-wide lens, recognising that securing the expansion of 'health and medical industries' in South Australia, for example, requires more than simply investing in the capacity of medical research facilities and universities.

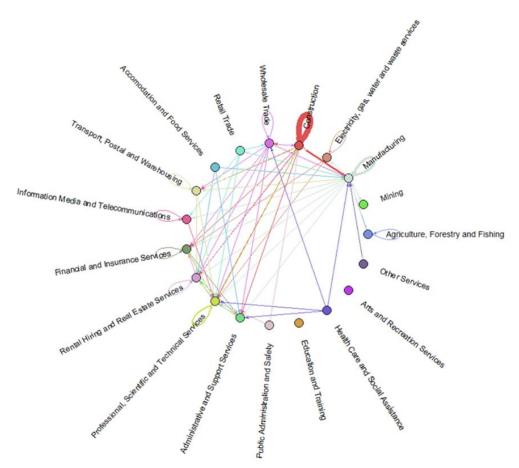
4.5 Inter-industry linkages in South Australia

Figure 8 provides a visual representation of the way in which different industries (represented by ANZSICs) are interlinked with one another. The data represented in this figure is drawn from input-output tables for the South Australian economy.

The strength of relationship between sectors is represented by the thickness of the lines linking them. For example, we see the strongest economic linkages between the construction and manufacturing sectors, which is unsurprising given the dependence of the former on manufactures.

There is also evidence of strong linkages shown between sectors that are, at face value, focused on very different sets of activities. For example, with health care and social assistance, we see strong interindustry linkages with manufacturing and wholesale trade, among others.

FIGURE 8. INDUSTRY LINKAGES, SOUTH AUSTRALIA



Source: ABS input-output supply tables

A value chain perspective allows us to fully grasp the way in which different parts of the South Australian economy are interconnected, and to recognise that the expansion of SGSs requires a nuanced understanding of the way in which different sectors interact.

This perspective also allows us to understand how the layout of cities can help to underpin regional strengths by allowing different elements of the value chain to locate optimally, in close proximity to related businesses. It also presents the case for facilitating the co-location of employment lands with

knowledge-generating institutions, such as occurs at Monash (see below), where manufacturing activities are able to benefit from the existence of industrial-zoned (IN1Z) land in close proximity to a university and a hospital.

4.6 Case study: Monash (Victoria)

In seeking to understand the future of this part of the South Road corridor, it is helpful to compare the region to others in Australia. In many ways, this part of Adelaide is similar to the region in the vicinity of Monash University and Monash Medical Centre in suburban Melbourne.

The Monash National Employment and Innovation Cluster (NEIC) is Victoria's largest employment cluster outside the Melbourne CBD. It hosts over 80,000 jobs and contributes over \$9.4 billion to the economy each year.

The local economy in the cluster is based around a set of world class medical, research and educational anchor institutions. Although Monash is of a much larger scale, the makeup of the anchoring institutions and the surrounding residential area provide a useful comparison for the South Road corridor.

Manufacturing, health care and social assistance, and education and training are the top industries of employment within the cluster. Employment within the latter two industries is largely driven by the anchor institutions. Although much of the manufacturing within the wider precinct is unconnected to these anchor institutions, there is a significant quantity of health-related and advanced manufacturing occurring within the Monash employment area.

The data shows that, despite making up only a small proportion of Greater Melbourne's total employment land, the precinct accommodates 13.1% of 'pharmaceutical and medicinal product manufacturing', and 9.5% of total 'professional and scientific equipment manufacturing'. This shows the opportunities generated through the colocation of employment lands with health and education institutions.

TABLE 2. SHARE OF EMPLOYMENT, SELECTED INDUSTRIES, GREATER MELBOURNE AND MONASH, 2016

	Greater Melbourne	Monash	Monash share of total
Human Pharmaceutical and Medicinal Product Manufacturing	5,581	729	13.1%
Professional and Scientific Equipment Manufacturing	7,939	750	9.5%

Source: ABS, SGS Economics and Planning

These anchor institutions are a major attraction for industry because they present the opportunity for collaboration on new technologies, new processes and new products. This is particularly important for the commercialisation of technology and the emergence of high-growth start-ups. The co-location of industry and research institutions is a major source of innovation and economic growth, not just within the cluster but for broader Melbourne, Victoria, and Australia.

The South Road Corridor has the right mix of land uses to emerge as a region with a similar role to that that played by Monash. Local government plays an important role in facilitating these precincts through land use planning, economic development strategies and initiatives for community inclusion and improved amenity.

4.7 Summary

There is a strong case that the South Road Corridor is situated within a region that can play an important role in driving strategic outcomes that benefit the South Australian economy, and in doing so, drive a range of diverse and high-quality employment opportunities within the City of Mitcham.

This being the case, a proper assessment of the value of land within the Subject Area requires a strategic perspective that views lots as part of an economic system that is greater than the sum of its parts. This idea is well encapsulated by the concept of the CSIRO's 'smiling curve', which demonstrates that, even though manufacturing uses generate relatively low value added (and are therefore linked to relatively low land values), they form part of larger value chains. Within these value chains, manufacturing activities directly contribute to the creation of opportunities for a range of other wealth generating economic activities.

Ultimately, growth of SGSs such as 'health and medical industries' and 'hi-tech' requires a perspective that considers the entire value chain and looks to safeguard and bolster the nature of the comparative advantages that allow South Australia to excel at these activities. As part of this, understanding how the availability of well-located land supports growth in these SGSs is vitally important.

The population-serving role of Melrose Park and the wider corridor

5.1 Overview

Employment lands play an important population-serving role. They do this by providing opportunities for the sorts of businesses and service providers that would be unsuited to commercial and retail centres. This broad category of activities, which includes showrooms, trade suppliers, food wholesalers, recreational uses and many more rely on access to customers (in the form of both households and other local businesses). With population and commercial activity relatively evenly spread across suburban Adelaide, so too is demand for these population-serving uses.

Sufficient access to employment lands is therefore important in underpinning productive local economies and liveable neighbourhoods across metropolitan regions. For this reason, it is reasonable to consider a population's access to population-serving uses in particular in considering the shape of regional employment land networks.

5.2 Population-serving jobs across Adelaide

At face value, it appears obvious that there is significantly less employment land in Adelaide's southern suburbs compared to northern areas. This is partly a reflection of the city's history and geography, with land use shaped by a range of factors including freight networks, proximity to key trade gateways, and access to working-class communities. These factors have led to certain parts of the metropolitan region being relatively underserviced by population-serving employment uses relative to others.

The benefits of local employment lands to liveability are well recognised and demonstrated by the rise of concepts such as the 20-minute neighbourhood³. The 30 Year Plan for Greater Adelaide outlines close access to employment zoned land (within 5km)⁴ a key element of healthy neighbourhoods. The benefits of providing residents with local jobs therefore extend beyond economics and intersect with Council's goals pertaining to community health and sustainability.

Using employment land 'layers' and breakdown of employment by small area data, SGS have created a map showing access to population-serving employment land uses across Greater Adelaide (see Figure 9). This map shows the number of population-serving jobs that are accessible within a 15-minute drive of any part of metropolitan Adelaide.

This analysis reveals that a swathe of metropolitan Adelaide stretching from parts of Tea Tree Gully in the northeast, down through Campbelltown, Burnside, Mitcham and across to northern parts of Onkaparinga and Marion have relatively poor access to population-serving floor space. Accepting that access to population-serving businesses is an important contributor to urban liveability, protecting

³ Local Living, Rise of 20 Minute Cities Post-Covid (theurbandeveloper.com)

⁴ The 30-Year Plan for Greater Adelaide (livingadelaide.sa.gov.au), page 75

access to these jobs for businesses and residents in already underserviced communities should be an important consideration in planning for employment lands.

Adelaide City of Mitchare serving jobs within 15 minutes 0.10

FIGURE 9. ACCESS TO POPULATION-SERVING JOBS

Source: SGS Economics and Planning

5.3 Conclusion

The following conclusions can be drawn from the analysis summarised within this chapter:

Access to population-serving uses in employment land is important, underpinning liveability and productivity

The importance of access to population-serving uses is highlighted within the planning profession by the growing prominence of the '20-minute city' and related concepts. Well-located employment lands support productivity of local businesses, and support liveability among households by providing a location for a wide range of key uses that are not able to locate within commercial or retail precincts.

Adelaide's inner southern suburbs are among the parts of the metropolitan area with the poorest access to employment land

The region to the east of the Precinct in particular has very poor access to employment land, a fact that should be considered relevant in regional land use planning.

6. Future demand for employment land

6.1 Overview

Setting aside discussions around the importance of employment land in securing strategic outcomes and in supporting regional liveability and productivity, it is helpful to understand the implications of projected employment on land use. To do this, SGS take small area employment projections derived from State Government forecasts and translate them into floorspace requirements for this Precinct.

This analysis replicates a well-established demand assessment technique which is premised on the idea that for every additional job locating within a region, new floorspace will be required, with the quantity of floorspace for each of these jobs varying depending on the industry sector.

6.2 Employment by ANZSIC, 2016 and 2036

The following data is drawn from employment estimates that were produced as part of work carried out by SGS Economics and Planning for the Federal Department of Infrastructure, Transport, Cities and Regional Development in 2019. These projections take into consideration all major committed infrastructure projects, including the South Road upgrade, so the changes expected to occur within this part of Adelaide over the next two decades are reflected in the modelling.

Figure 10 shows that the number of jobs in the precinct is set to grow from around 7,600 in 2016 to 9,900 by 2036 – equivalent to a net growth of approximately 2,300 over 20 years. The principal contributors to this growth are:

Manufacturing: +1,040 jobs

Health care and social assistance: +340 jobs

Construction: +240 jobs

Retail trade: +230 jobs

Not all sectors are expected to grow. Shrinking sectors include transport postal and warehousing and wholesale trade, which are likely to be driven out by rising land prices, a growing preference for 'scale' in these sectors, and a growing preference for these types of businesses for precincts in Adelaide's northern and north-western suburbs.

FIGURE 10. ESTIMATED EMPLOYMENT IN 2016, AND PROJECTED EMPLOYMENT IN 2036

ANZSIC	2016			2036			Change (2016-36)		
	Blue collar	White collar	Total	Blue collar	White collar	Total	Blue collar	White collar	Total
Agriculture, Forestry & Fishing	39	14	53	38	14	52	-1	-	-1
Mining	3	4	7	5	5	10	2	1	3
Manufacturing	691	701	1,392	1,159	1,276	2,435	468	575	1043
Electricity, Gas, Water & Waste Services	31	46	77	41	59	100	10	13	23
Construction	512	296	808	671	378	1,049	159	82	241
Wholesale Trade	118	271	389	95	218	313	-23	-53	-76
Retail Trade	217	863	1,080	264	1,055	1,319	47	192	239
Accommodation & Food Services	107	139	246	145	186	331	38	47	85
Transport, Postal & Warehousing	118	115	233	94	93	187	-24	-22	-46
Information Media & Telecommunications	22	73	96	30	94	124	8	21	28
Financial & Insurance Services	2	189	191	3	254	257	1	65	66
Rental, Hiring & Real Estate Services	9	63	72	12	84	97	3	21	25
Professional, Scientific & Technical Services	24	228	252	33	306	339	9	78	87

SGS ECONOMICS AND PLANNING: MELROSE PARK EMPLOYMENT LAND STUDY

Administrative & Support Services	126	86	212	170	115	285	44	29	73
Public Administration & Safety	29	212	241	39	285	324	10	73	83
Education & Training	13	387	400	16	480	495	3	93	95
Health Care & Social Assistance	85	854	939	119	1,145	1,264	34	291	325
Arts & Recreation Services	13	53	65	16	65	81	3	12	16
Other Services	478	380	857	461	373	834	-17	-7	-23
TOTAL	2,636	4,972	7,608	3,412	6,485	9,896	776	1,513	2,288

Source: SGS Economics and Planning

6.3 Broad Land use Categories

In estimating the land use implications of employment, it is important to understand the link between employment by industry and land use, recognising that activities within a sector are likely to be linked to activity across a range of Broad Land use Categories (BLCs). For example, whilst manufacturing sector workers are usually employed in traditional 'factory' environments, many are involved in other tasks that require other forms of employment floorspace, including research and development, management, marketing, legal services, information technology, etc.

In recognition of this, a set of BLCs has been developed, with employment for each sector split across each. Table 3 shows the share of employment by sector across each BLC. These shares are based on the outcomes of land use surveys carried out in relation to similar employment lands in other parts of Australia, with adjustments made to ensure the unique characteristics of the Precinct are reflected.

TABLE 3. BROAD LAND USE SHARE BY ANZSIC

	Business / Office Parks	Office	Retail - Big Box	Bulky Goods Retail	Mall retail & service	Short-term Accommoda tion	Dispersed Activities	Special Activities	Service industry and urban	Manufacturi ng - Light	Manufacturi ng - Heavy	Freight and Logistics	Urban Services
Agriculture, Forestry & Fishing	0.1	0.2	0	0	0	0	0	0	0	0	0	0	0.7
Mining	0.1	0.2	0	0	0	0	0	0	0	0	0	0	0.7
Manufacturing	0.5	0.05	0	0	0	0	0	0	0	0.45	0	0	0
Electricity, Gas, Water & Waste	0.2	0.4	0	0	0	0	0	0	0	0	0	0	0.4
Construction	0.15	0.35	0	0	0	0	0	0	0.3	0	0	0	0.2
Wholesale Trade	0.25	0.2	0	0.25	0	0	0	0	0.3	0	0	0	0
Retail Trade	0	0	0.2	0	0.8	0	0	0	0	0	0	0	0
Accommodation & Food Services	0.15	0.1	0.1	0	0.4	0.25	0	0	0	0	0	0	0
Transport, Postal & Warehousing	0.1	0	0	0	0	0	0.5	0	0	0	0	0.4	0
Information Media &	0.5	0.2	0	0	0.3	0	0	0	0	0	0	0	0
Financial & Insurance Services	0.2	0.45	0.05	0	0.3	0	0	0	0	0	0	0	0
Rental, Hiring & Real Estate Services	0.1	0	0	0.2	0	0	0	0	0.05	0	0	0	0.65
Professional, Scientific & Technical	0.7	0.1	0	0	0.15	0	0	0	0.05	0	0	0	0
Administrative & Support Services	0.3	0.3	0.1	0	0.2	0	0	0.1	0	0	0	0	0
Public Administration & Safety	0.3	0.15	0	0	0.2	0	0.25	0.1	0	0	0	0	0
Education & Training	0.2	0	0	0	0.1	0	0.1	0.6	0	0	0	0	0
Health Care & Social Assistance	0.2	0.2	0	0	0	0	0.25	0.35	0	0	0	0	0
Arts & Recreation Services	0.3	0.4	0	0	0.05	0	0.1	0.15	0	0	0	0	0
Other Services	0.2	0.3	0	0	0.15	0	0.05	0	0.3	0	0	0	0

SGS ECONOMICS AND PLANNING: MELROSE PARK EMPLOYMENT LAND STUDY

6.4 Change in employment by Broad Land use Category

To convert the broad land use implications of employment change between 2016 and 2036, SGS has carried out the following steps:

- 1. Apportioned employment by ANZSIC to different BLCs using the proportions set out in Table 3,
- 2. Established a figure for 'square metres of floorspace' for each BLC, once again using previous land use audits as a base and adjusting for the local context, and
- 3. Multiplied workers across each BLC by the 'square metres per worker' figure.

Based on small area employment projections, and as discussed in the previous section, the number of people employed across the catchment is expected to rise from 7,600 to 9,900 between 2016 and 2036.

By converting these employment projections to floorspace demand using figures from Table 3, it can be estimated that the additional 2,300 workers will generate demand for an additional 143,000 square metres of additional employment floorspace.

The figure shows that, with manufacturing expected to grow strongly throughout the catchment, there is a need to ensure the provision of additional floorspace for manufacturing in particular.

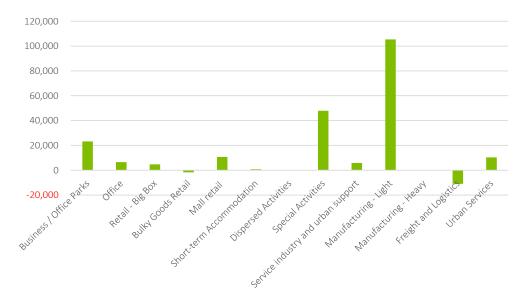


FIGURE 11. EMPLOYMENT BY BLC, 2016 AND 2036

6.5 Conclusion

The analysis above shows that around 143,000 square metres of floorspace are estimated to be required by 2036 to an estimated 2,300 additional workers within the Precinct.



These projections make clear that there is a need for the generation of new floor space in the catchment. This may emerge through the establishment of multi-storey buildings in select locations (for office and retail uses in particular), and through the demolition and rebuild of existing structures that make better use of existing land.

It is important to note that it is not inevitable that these new jobs will emerge within the region. Supply side constraints, including restrictions on land use and the lack of available land, would result in job creation lower than the figures projected. Under these scenarios, jobs may instead be established in suboptimal precincts elsewhere in Greater Adelaide, resulting in adverse consequences for economywide productivity. It is also entirely possible that jobs will simply be lost to the state, with employment directed instead to more attractive precincts elsewhere in Australia and Asia.

Issues regarding the rezoning of employment land

7.1 Overview

The previous sections have focused on translating the state's strategic direction, regional employment projections, and the needs of the surrounding community into a set of opportunities for the precinct. The analysis carried out within these sections tends to highlight the importance of the retention of the precinct for employment uses.

It is entirely reasonable, however, that consideration be given to alternate uses in a precinct, even where there is a strong case for its retention for employment uses. There are numerous examples in recent decades in Adelaide where the decline of the manufacturing sector has been used as justification for the rezoning of employment lands to other uses, typically residential and/ or retail.

The question of whether a rezoning represents good planning policy is often a complex one, requiring consideration of a range of issues. A number of these are discussed below.

7.2 The 'highest and best use' (HBU) argument

Often, the case for these one-off changes in land use is that conversion to residential represents a higher and better use of land. What this means is that the returns to landowners on that land will be higher if it is used for residential purposes. This is a valid argument in some cases, with uplift in land value representing a net welfare improvement for the community (albeit one that is enjoyed by a small number of individuals).

When the land in question is very clearly non-strategic and surplus to the needs of the local economy, and where the introduction of sensitive uses doesn't undermine the viability of remaining employment uses, then an HBU approach to informing land use planning makes sense.

The problem with HBU analysis, however, is that it in considering only the benefit accruing to landowners, it fails to consider the *externalised costs* associated with a change in land use. Externalised costs (most commonly referred to as 'externalities') are those imposed on the community as a result of a transaction or activity. Examples of these 'externalities' include:

- The permanent loss of strategically important employment locations
- The undermining of a region's strategic advantages
- The introduction of sensitive uses to remnant employment land that were previously adequately buffered
- Additional demand for community services and local infrastructure linked to new populations

That these externalities should be actively considered by Council is uncontroversial. Indeed, it could be argued that the planning profession exists entirely to ensure that individuals' land use decisions do not adversely impact the welfare of the community as a whole. It is therefore right that the full range of other community impacts are properly considered alongside the benefit accruing to landowners.

7.3 Housing affordability

Proponents of urban infill often claim that infill opportunities promote affordability. This view is commonly held, and perhaps makes sense on an intuitive level, but a link between rezoning, the development of new dwellings, and house prices is generally not supported by the evidence⁵.

The reason for this is that developers, large and small, are interested first and foremost in optimising the value of their land holdings. This being the case, they seek to develop and sell when market conditions are favourable, and 'land bank' if it seems like they will have to sell into a depressed property market. To do otherwise would not be rational.

The study referenced above examined 20 years of zoning changes, housing supply, and prices across around 25,000 sites in Greater Brisbane. It found that there was a very weak link between additions to zoned supply, new development and housing affordability. The work found that developers rarely sought rezoning with an intent to develop immediately, with only 6% of sites developed within five years of a change in zoning. The reason for this delay is likely to be associated with profit maximisation – it is rational for a developer to wait until market conditions are favourable before developing.

As discussed, landholders hold off from releasing lots when property prices are low, but the report also found the same was happened during 'boom times'. Often these delays were associated with allowing development applications to lapse, and the seeking of subsequent applications at higher densities.

Ultimately landowners seek a relaxation of planning controls not because it results in the release of supply and lower prices, but because it increases the value of their land.

7.4 Improved amenity in surrounding areas

Proponents also claim that rezoning of employment land to residential land generates an improved urban experience for those living adjacent to the rezoned land. This improved experience (or amenity) is likely to be reflected in an increased willingness to pay for this housing, and a rise in house prices in the affected area.

Where employment land uses are 'externality-generating', i.e., they generate noise, noxious odours, activity outside of normal business hours, heavy vehicle movements in nearby streets, etc., it is reasonable to claim that rezoning has the potential to generate benefits for residents in adjacent residential areas.

That said, it is important to recognise that the rezoning of employment land to sensitive uses doesn't eliminate this problem. Rather, it shifts the burden of the 'interface problem' to new residents. If

SGS ECONOMICS AND PLANNING: MELROSE PARK EMPLOYMENT LAND STUDY

⁵ Limb, M and Murray, C; We zoned for density and got higher house prices: Supply and price effects of upzoning over 20 years

ultimate dwelling densities are higher in the rezoned land (as is likely to be the case here), then it may be the case that rezoning results in a situation in which even larger numbers of residents are adversely impacted by interface issues.

7.5 Impact of rezoning on adjoining employment lands

We tend to think of the 'separation of uses' principle as existing to protect residents, shoppers, etc, from impacts of externality-generating uses. Of course, it works the other way too. One of the reasons employment lands exist is to 'protect' noisy, dirty (but essential) forms of economic activity from encroachment of sensitive uses. It's therefore possible to see that the active curation of relatively low amenity urban environments is important in allowing externality-generating businesses to operate freely and unencumbered within metropolitan areas.

For this reason, it is important to protect 'core' areas within employment lands by keeping sensitive uses out. One way to do this is to ensure that 'interface areas', or the boundaries where lower amenity employment lands are appropriately managed. Ultimately, the rezoning of land on the edge of a precinct to allow the introduction of sensitive uses adjacent to other employment uses has the potential to reduce the utility of that land for existing users, and potentially undermine its ongoing viability as employment land, potentially leading directly to further demands for rezoning.

It is important to recognise that, in this way, the viability of employment lands can be progressively undermined by the rezoning of parcels on the fringe of precincts.

7.6 The precautionary principle (option value)

In considering whether to rezone land, it is useful to consider the idea of the 'precautionary principle'. In this case, the precautionary principle refers to the idea that, in the context of an unknowable future, in considering whether to rezone the land now to allow residential uses, or retain the land for employment uses, we should lean towards the option that is least risky.

In this case, if it is decided to retain the existing zoning based on our current understanding of the world, and it becomes apparent ten years later that the land should have in fact been rezoned, then it is simply a matter of carrying out a belated rezoning. Under this scenario, there would be scope to remedy the error at relatively minimal cost.

On the other hand, if a rezoning carried out today were subsequently found to be a poor decision, there would be no realistic path to remedying the outcome.

In considering land use planning, exercising the precautionary principle should not necessarily mean that no rezoning is ever undertaken. Rather, it emphasises the need for caution and the development of a compelling case for change before the making of decisions whose impacts are not able to be reversed.

This principle is particularly important to consider in situations of radical change and uncertainty, such as we are experiencing today. For example, given the likelihood of significant change in the South Australian economy in the 'post-COVID' world, and the looming changes in Adelaide's economic geography that will be precipitated by the completion of the North-South Corridor, it could be argued

that, unless a proposal is absolutely compelling, the optimal choice might be to wait until the future is more certain before committing to permanent changes in land use.

7.7 Employment lands' role in value translation

Employment land is often presented as an unproductive use of resources, with this low productivity reflected in low land values relative to other uses.

This perspective fails to consider the role played by industrial precincts in value *translation*. The value chain explains the process along which goods and services pass, with economic value added at each stage. By way of example, raw minerals might be extracted at the beginning of a value chain, then refined, which adds value. These refined materials are then suitable for inclusion in the electrical componentry which form part of a mobile phone, which is ultimately sold to an end-user. At each stage of this process, value is added. In general, the more complex the process and the further along the value chain, the more value is added and the higher the labour costs are that are required to do this.

Industrial precincts accommodate businesses that play various roles along such value chains. It is important that their role is understood because it is in this role that the true value of industrial precincts is made manifest. One way to illustrate this is through the business management concept known as the 'Smiling Curve'⁶. The Smiling Curve illustrates the relative value added at various points along the value chain. It contends that relatively more value is added in the pre- and post-production phases of the value chain than in the manufacturing process itself (Figure 12).

VALUE ADDED

Design

Design

Marketing & sales

Manufacturing

Pre-production intangible

Pre-production tangible

VALUE CHAIN ACTIVITES

FIGURE 12 THE SMILING CURVE CONCEPT

Source: CSIRO, 2016 (Adapted from Stan Shih's 'Smiling Curve')

SGS ECONOMICS AND PLANNING: MELROSE PARK EMPLOYMENT LAND STUDY

⁶ The Smiling Curve was developed by Stan Shih, the founder of Acer, to reflect the relationship between value adding process and the supply chain

The least valuable part of the value chain, in terms of value-adding, is typically the manufacturing component, with much higher levels of value added in knowledge intensive activities such as R&D. What this perspective fails to recognise however, is the role manufacturing plays in *enabling pre-production and post-production value*. So, while the singular manufacturing link in the value chain may be low value when viewed in isolation, when considered from the value chain perspective, it can be understood as a highly valuable process in the creation of downstream value.

7.8 Land 'surplus to requirements' given plans for other parts of the precinct

It may be claimed by proponents that land in a particular area is not required, as candidate uses would be easily accommodated in other parts of the precinct.

In this case, it has been asserted that any regional growth could be accommodated within the Edwardstown Employment Precinct in the City of Marion (the employment region bounded by Daws Road, South Road, Cross Road, and the Seaford Rail Line).

There are a number of important points to make in regard to this.

Firstly, in order to conclude that future growth across the precinct can indeed be accommodated within Edwardstown, detailed projections are required in relation to the types of businesses likely to locate there, employment (by industry and occupation), and quantity of floorspace per worker. Consideration must also be given to unique characteristics of the precinct and how these influence its appeal to different activities. These include the mix of lot sizes (and the availability of large lots in particular), ease of access for heavy vehicles, encroachment of sensitive uses, and so on.

Secondly, the 'picking of winners' in terms of the areas designated for future employment growth ignores the benefits of flexibility in terms of land use. Ensuring (within reason) a diverse and expansive set of locational options for new and expanding businesses is an important ingredient to a flexible and nimble economy that is capable of rapid adaptation to changing economic circumstances.

Lastly, a reduction in supply of employment land can lead to shortages that result in the prices of land being 'bid up', contributing to a range of issues, including reduced productivity (see Inner Sydney case study below).

7.9 Case studies: employment lands in inner Sydney and Melbourne

SGS will illustrate the need for effective management and planning of employment lands through discussion of employment land in Sydney and Melbourne.

In recent years, the Victorian planning system has tended to support the retention of employment lands, with growing recognition of the importance of employment land in supporting strategic employment growth and more.

Gordon and Mephan Street Precinct, City of Maribyrnong, Victoria

The Gordon and Mephan Street Precinct is located in Melbourne's inner western suburbs, a traditionally working-class region that has seen dramatic growth in residential property prices in recent

years. This growth has created a significant financial incentive for the rezoning of employment lands to residential uses. The location of the site is shown in Figure 13.



FIGURE 13, GORDON AND MEPHAN STREET PRECINCT

Source: Maribyrnong Planning Scheme Amendment C143

In 2018, Planning Panels Victoria considered a proposed amendment to the local Planning Scheme that aimed to ensure the Precinct remained employment land into the future. A number of submissions were made by interested parties which argued that parts of the precinct were suitable for rezoning, in particular the 'anomalous' northern section (2-4 Mephan Street).

The Panel, in recommending the retention of the land for employment uses, made the following relevant comments:

- The Panel considers that the site continues to offer opportunity for employment activity that can serve the local community and the growing population of the local area. Benefits include not only opportunities for employment but also for services to the local community. These are benefits that should not be discounted.
- Although (various parties) asserted that the nature of the buildings and works and the locational aspects of the site make it difficult for re-use/redevelopment, the Panel was not provided with evidence to demonstrate these concerns. Accordingly, it is not in a position to affirm or dismiss such conjecture. However, it is in a position to form the view that the site offers a sufficiently large area that make it possible to be used by one or multiple occupants, that could include office use, warehousing, distributional activities, and other small-scale occupations that can have a local flavour with respect to employment.

Inner city employment lands in Sydney

SGS has carried out work for the Greater Sydney Commission to examine the role of the city's employment lands in the future metropolitan economy. The focus of the work was on relatively 'contested' precincts in parts of Sydney with the highest residential land values, largely in 'inner city' Sydney. The report found that the ongoing conversion of employment to residential land was having a significant productivity impact on the Sydney economy.

The work found that employment lands in parts of central Sydney were equally or more productive than commercial land within the Adelaide and Parramatta CBDs (see Figure 14).

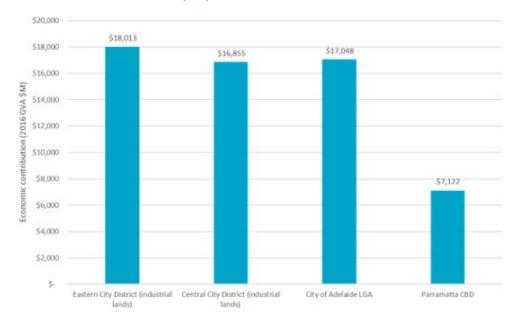


FIGURE 14. ECONOMIC PRODUCTIVITY (GVA) OF INDUSTRIAL PRECINCTS VS COMPARISON CENTRES

Source: SGS Economics and Planning

This high productivity reflects the lack of employment land in inner city Sydney, and of the fact that land there is used highly intensively, with lower value adding industries (such as manufacturing, distribution and urban services) forced to locate in other suboptimal parts of the metropolitan area. In Sydney's case, the shortage of employment land generates the following costs:

- The loss of genuine mixed-use precincts
- Increased costs associated with household and business access to population services
- Increased construction costs as a result of forcibly dispersed supply chains
- Increased shipping and distribution costs
- Reduced ability to support growth of advanced manufacturing
- Lack of access to employment

8. Summary

8.1 Overview

This report has investigated the role this precinct may play in the future metropolitan and state economy, given trends, population projections, and considering the state's comparative advantages and strategic growth trajectory. The analysis concludes that there is an opportunity for the precinct to play an important role in supporting future growth in health and medical industry and hi-tech sectors in particular. It also makes the point that Adelaide's inner southern and eastern suburbs have relatively poor access to employment land, and to population-serving uses in particular, and that retention of existing employment land represents an opportunity to support regional liveability. Also, small area employment projections clearly set out the potential to grow employment should sufficient opportunities for expansion of floor space be supported.

Some of the key issues associated with the rezoning of employment land are also addressed, with these helping to shed light on the way in which land within this precinct should be treated.

Having done this, a number of possible strategic directions and actions are identified. These strategic directions emerge from the findings of the report and provide a set of responses Council could consider in seeking to ensure that employment land at Melrose Park and across the broader South Road Corridor are able to support ongoing growth of regional employment and the wider regional economy.

The priority of reach action is assessed, with a low, medium, or high priority attached to each. A high-level assessment of likely resource cost to Council associated with each action is also carried out.

8.2 Strategic directions & actions

The primary focus of this report has been an analysis of the current and projected future demand for employment uses, and an overview of the strategic context within which development of the precinct will occur.

To some degree future outcomes across the precinct will be market-led, however the impact that Council could have on its future success should not be underestimated. To this end, we have identified a set of strategic directions and actions that Council may wish to explore, from planning policy to branding and the use of Council assets including the public realm. The following list is by no way exhaustive, but is intended to provide a starting point for further discussion.

Strategic Direction #1: Ensure that the future potential of the Precinct is adequately reflected in land use policy

Land use policies at the local and State levels should clearly reflect the desired role of this precinct in the future economy of the region and state.

Actions

	Timeframe (short-, medium-, long-term)	Cost (low, moderate, high)
Limit the encroachment of sensitive uses and activities in and adjacent to the precinct to ensure precinct businesses are able to operate uninhibited.	S	L-M
Ensure that statutory planning provisions for the precinct reflect the needs of future businesses.	S	L-M
Carry out work to confirm future demand for floorspace across the precinct and carry out capacity analysis to understand whether required floorspace growth can be secured under existing policy settings, and to determine what sorts of interventions may be required to ensure opportunities for employment growth are captured.	S	М
Ensure clear policy direction in relation to employment lands to facilitate investment, employment creation and economic growth, and to disincentivise land banking and speculation on the edges of the precinct.	S	L
Work with the City of Marion and State Government to develop a shared vision and strategy for fur land use within the precinct, and across the broader region	L	М
Update employment land analysis once 2021 Census data has been released	L	L

Consider policy in relation to the precinct's 'central core', building an understanding of the potential future role of 'externality-generating' businesses in the region.	S	М
Ensure that, within reason, planning policies are broad and flexible to enable the development of agglomerations, and to foster the growth of new business opportunities across the value chain	S	М

Strategic direction #2: Consider targeted investments/ interventions to support the expansion of employment opportunities in the catchment

New employment uses are expected to arise across the catchment, with Council having an important role in supporting their establishment.

Actions

	Timeframe (short-, medium-, long-term)	Cost (low, moderate, high)
Recognising the growth of knowledge-intensive sectors, consider the need for investments in public realm across key parts of the precinct.	М	М-Н
Work on a precinct activation plan, which might include a precinct 'brand' plus connections to surrounding areas and institutions	М	М
Work with the State Government and the City of Marion to ensure that tunnel and at-grade outcomes along the Torrens to Darlington (T2D) South Road upgrade project support the future vision of the precinct	S	L
Consider the potential for better integration between parts of the Precinct and Winston Avenue.	М	L
Investigate the role that Council's landholdings might play in this precinct now and into the future, including road reserves and the depot site	М	L
Investigate infrastructure and service needs (e.g., roads, footpaths, parking, rubbish collection, digital technologies etc)	S	L

Strategic direction #3: Work with key regional stakeholders to build relationships, recognising the role played by the precinct in a broader economic system

Planning for the precinct should recognise potential for growing integration with Flinders University, Flinders Medical Centre, Tonsley and activities on the western side of South Road.

Actions

	Timeframe (short-, medium-, long-term)	Cost (low, moderate, high)
Inform existing landowners/ occupiers of investigations undertaken to date and the current status of these investigations and seek feedback in relation to this work	S	L
Work with existing and potential landowners/ occupiers within the precinct to better understand their current and future needs	S	L
Engage with strategically important regional businesses to understand constraints to growth, land use requirements etc into the future	S	L-M
Engage with strategically important institutions and organisations such as Flinders University, Flinders Medical Centre, Tonsley Innovation Precinct (Renewal SA) and the Repat Health Precinct to understand partnership/ support opportunities for employment land at Melrose Park	S	L-M
Work with the City of Marion and the State Government to establish a shared vision for the wider area of strategic employment land	S	М
Investigate beneficial links between this and other growth precincts identified in Council's Spatial Vision (e.g., St Marys)	S	L-M

MELBOURNE

Level 14, 222 Exhibition Street Melbourne VIC 3000 +61 3 8616 0331 sgsvic@sgsep.com.au

CANBERRA

Level 2, 28-36 Ainslie Avenue Canberra ACT 2601 +61 2 6257 4525 sgsact@sgsep.com.au

HOBART

PO Box 123 Franklin TAS 7113 +61 421 372 940 sgstas@sgsep.com.au

SYDNEY

209/50 Holt Street Surry Hills NSW 2010 +61 2 8307 0121 sgsnsw@sgsep.com.au





Overview of Strategic Focus Areas: South Road Corridor (Surface Road)





Urban Village: Edwardstown (Nth) & **Clarence Gardens**



Improving Connections: Edwards & Raglan

Improving Connections: Price & Castle Plaza



Unity is Strength: SEL Melrose Park & Edwardstown







Streetscape & Activation: Winston Avenue

Opportunity / Problem Statement

South Road and council boundaries have divided this community. With a little vision and firm partnerships with DIT and the City of Marion, a very real opportunity exists to shape its identity by leveraging assets at the core of this precinct.

This busy dog-leg intersection is a critical juncture in east-west vehicle movements across the city (including public transport). T2D and strategic site availability present an opportunity for significant improvements to the alignment and operation of this intersection.

Signalised east-west car and pedestrian connections across South Road are infrequent and some could arguably be better positioned to service the local and wider community. Changes to Edwards & Raglan provide a unique opportunity to realign an existing pedestrian crossing to connect Price Street with Castle Plaza.

Investigations into Strategic Employment Land at Melrose Park has highlighted the importance of this and similarly zoned land in Edwardstown to SA's economic prosperity. How can we improve connections between these strategically important areas?

Access from St Marys onto the northbound carriageway of the 'new' South Road is likely to be circuitous. The retention of a 3-way signalised intersection at Celtic Avenue, Clovelly Park presents an opportunity to explore interventions that may benefit the local and wider community.

St Marys is well placed to benefit from and add to the success of the Tonsley Innovation District, but it was removed from the Growth DPA in 2019. If left any longer, will this be a key opportunity

Winston Avenue is a quiet achiever that continues to grow organically and provide services to the local community. Have we properly considered how to best support this organic growth, with an eye to widening its appeal?





DTI:PlanSA Submissions

From: Abel Elton

Sent: Tuesday, 10 October 2023 11:57 AM

To: DTI:PlanSA Submissions

Cc: Steven Conn

Subject: Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater Adelaide Regional Plan Discussion Paper.pdf

You don't often get email from

Learn why this is important

Dear PlanSA,

I am writing on behalf of the Mount Barker Council to formally submit the council's response to the "Greater Adelaide Regional Plan Discussion Paper" as a PDF document. This submission is in response to the call for public input and feedback on the discussion paper.

Attached to this email, you will find the PDF file containing our council's response to the discussion paper. We have carefully reviewed the document and have included our recommendations, insights, and suggestions for consideration in the planning process.

Should you require any additional information or have any questions regarding our submission, please do not hesitate to revert back to us.

We appreciate the opportunity to participate in the planning process and look forward to collaborating with Plan SA to ensure the sustainable and prosperous development of Greater Adelaide.

Abel Elton

Work Experience Placement



DIT

6 Dutton Road, Mount Barker, South Australia, 5251

PO Box 54, Mount Barker, South Australia, 5251

W www.mountbarker.sa.gov.au

This email and any attachments to it may be confidential and/or subject to legal professional privilege. If you are not the intended recipient you may not disclose or use the information contained in the message in any way. If received in error please delete all copies and contact the sender by return e-mail. Email messages may be monitored or accessed by Council staff other than the intended recipient. No warranty is made that any attachments are free from viruses. It is the recipient's responsibility to establish its own protection against viruses and other damage.



Reference: DOC/23/107262

3 October 2023

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

plansasubmissions@sa.gov.au

Dear Growth Management Team

RE: Greater Adelaide Regional Plan Discussion Paper Submission

Introduction

Thank you for the opportunity to provide a submission on the Greater Adelaide Regional Plan Discussion Paper.

Mount Barker is the fastest growing Council in South Australia and the 8th fastest in Australia, and is set to become the second largest city in South Australia within the next ten years.

For the benefit of the State Planning Commission, a response has been provided to each of the 'For discussion' questions spread through the Discussion Paper, in table form over pages 2 – 9 of this letter.

Mount Barker Council would like to emphasise primary summary points, at a high level, of:

- Infrastructure pressures imposed on Council through rezoning of the Mount Barker growth area
- Concern on potential encroachment into existing township boundaries and erosion of the Environment Food Production Areas (EFPAs)
- Mass transit shortcomings within the district
- Acknowledgement of no further residential growth envisaged for Mount Barker
- Support for investigations on employment lands near Callington.

Council is pleased to provide the below submission on the Greater Adelaide Regional Plan Discussion Paper.

Comments on the Discussion Paper

For discussion	Council comment
What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?	The intended outcomes, all of which fall under the 'Living Locally' concept are supported. The environmental sustainability of development should be given a greater focus, especially in relation to access to water, both potable and non-potable, and ensuring the protection of the public water supply for Greater Adelaide. Council is actively involved in consultation on SA Water's 'Resilient Water Futures' strategy.
	It is unclear why transport and infrastructure are not listed as upfront considerations in any forward planning exercise.
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 trends and drivers impacting the district are real and universal.
	What Council would like to know is how some of the trends and drivers given in the Discussion Paper will impact its district. Will 'Decentralisation', for example see further employment opportunities provided?
	Mount Barker has experienced considerable residential growth in recent years and would benefit from a mass transit to Adelaide City in addition to a greater quantity and quality of employment options in the district that allows residents to experience Living Locally.
	In relation to the Discussion Paper, Council acknowledges that no further residential growth is envisaged for Mount Barker or the district beyond what is already allowed within existing zoning. While this is supported, we know that growth will continue in Mount Barker for decades to come and it is essential that this growth is factored into broader planning in the region, including the growth targeted in Murray Bridge, which will increase capacity issues on the South Eastern Freeway. A mass transit solution is needed for this transport corridor to accommodate additional growth. Infrastructure

For discussion	Council comment
	South Australia (ISA) should be charged with the task to improve mass transit options, connections to public transport in general and address the infrastructure deed shortcomings to bring forward completion of Heysen Boulevard.
	Council recently undertook a community scorecard survey across the district, which identified roads, traffic management and responsible growth as priority items of concern in the eyes of the community, with the infrastructure especially seen as not keeping up with the rate of change. Survey responses identified much of the positive work being undertaken by Council through improved sporting facilities, footpaths and connectivity and a greater variety of shopping options. The community is aware of the benefits that come with growth but as much of Mount Barker is left experiencing the shortcomings of a misalignment of development with infrastructure, it is imperative that the Commission learn from this in designating new areas for expansion.
·	Climate change is a major driver that will profoundly affect the future of the region. For Mount Barker, this will include increasing pressures on natural systems and biodiversity, water security and more frequent and intense bushfires. The GARP should have a much stronger focus on climate impacts and how they will be managed. For example, new developments should be able to demonstrate increased self-sufficiency in water supplies and not just rely on the river Murray, which is the sole water supply for those areas in the Mount Barker district serviced by SA Water, which is likely to become increasingly problematic as a reliable water source.
What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilde	The Mount Lofty ranges are identified as a biodiversity hotspot and development in the region is affecting biodiversity values.

For discussion	Council comment
and climate resilient environment?	The GARP appears to preference greenfield development over infill. To reach a greener and wilder environment, a greater emphasis should be placed on development in a closer proximity to Adelaide city. Without targets in this iteration of the regional plan, it is difficult to see how the themes and concepts of the plan will be measured.
- 395	Concurrently, the Mount Barker district should be seen as an attractive option for employment growth, including potential for more intensive food production supported by use of recycled water and other alternative water sources.
	There is a concern that the groundwork is being laid for development to encroach into the Environmental and Food Production Areas (EFPAs). These areas are known for their agricultural, environmental and tourism value and it should be the aim of the Plan to improve the level of land holding such values, and not to simply see growth that does not compromise this land. With the Commission looking to take a regenerative approach to greenfield and township growth, more will need to be done to give confidence that this will be achieved or is achievable and that existing township boundaries will be respected.
	The Australian Government's 'Nature Positive Plan: Better for the environment, better for business' (DCCEEW.gov.au) points out that areas experiencing the greatest levels of development pressure are those with high biodiversity. It is suggested that the Commission collaborate with the Australian Government and consider including the Mount Lofty Ranges in a Plan that truly values, protects and extends nature conservation outcomes. Further, the plan should recognise the benefits of the region in the protection of water supply for Greater Adelaide along with the recognised agricultural,

For discussion	Council comment
	environmental and tourism values outlined above.
	The hazard exposure of many houses in the growth areas to increased flood, bushfire and heat risks is a concern and one that is being felt by residents through the district and the estates of Mount Barker today, which are being developed at a hard interface with high risk bushfire land.
	The concept of inter-urban breaks is also supported by Council's interactions with its various communities, which routinely raise a desire to retain the distinct characteristics of their town. Council would like to see this idea fleshed out in the development of the new Plan. There is much potential in the Plan's vision for Living Locally, increasing the level of urban green cover, a wilder and climate resilient environment and character preservation, among other items and themes – Council wants to see that this is followed through and pushed to the betterment of Greater Adelaide as a whole. There does not appear to be sufficient emphasis on development closer to Adelaide city.
What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?	Council is aware of increasing homelessness through its district, caused by housing affordability pressures and cost of living. The difficulties in providing a required level of infrastructure through the growth area of Mount Barker has seen rates rise and further land development costs passed on to our residents, as noted in the 'Land development cost comparison' (Figure 4) in the Discussion Paper.
	State assistance at the time of large scale rezonings for future greenfield growth would moderate this impact and ease impacts on other localities that would otherwise have to accommodate such growth.
	The residential vacancy rate across Adelaide and Mount Barker is incredibly low, at approximately

For discussion	Council comment
€ *	0.6% and 0.4% respectively. It would seem that there is either insufficient supply or simply a lack of affordable options.
What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?	The Plan should include a clear vision for Greater Adelaide and show where infrastructure investment will occur.
What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?	The Mount Barker growth area has seen development adopt a fairly high plot ratio and low scale with no take up of buildings over two storeys. The delivery of a greater choice could be assisted through policies such as:
•	 minimum densities clarity on siting of commercial uses encouraging mixed uses in vicinity of local activity centres.
What neighbourhood features enhance living and working locally?	Areas that successfully exhibit the characteristics of Living Locally exhibit good levels of accessibility, primarily in the form of mass transit options.
	The concept of Living Locally is a well-supported planning principle. For the development of the Plan, incentives may need to be applied on inner metropolitan Adelaide to ensure that Greater Adelaide develops in a more sustainable manner. The local character, heritage and amenity issues felt in inner metropolitan areas are even more pertinent through the townships of our district, which are undergoing rapid change while experiencing little of the benefits promoted through Living Locally.
	The recommendations of the 2022 ISA Mount Barker Mass Transit Study (ISA023-MBMT-Report- Corrected.pdf (infrastructure.sa.gov.au)) are noted here through a possible combined solution of a bus rapid transport service in addition to greater employment options within the township.
	This issue will only intensify with Murray Bridge now identified as a 'Growth Investigation Area'

For discussion	Council comment
	along Greater Adelaide's Eastern Spine. Of the local government areas along this spine, Mount Barker and Adelaide Hills Councils have a considerably lower share of residents working in each district than those either closer to Adelaide city or Murray Bridge and that there is a lesser proportion of those jobs in professional or higher paying industries.
How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?	Like all other forms of development, greenfield developments need to provide a mix of densities and land uses, integration with existing townships and access to transport options that link with employment options.
What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?	Satellite cities should exhibit a distinct centre and a range of employment options.
What do you see as the benefits and potential drawbacks of greenfield development?	This type of development is popular with families and offers a good alternative to inner metropolitan living, generally achieving greater affordability and a relaxed lifestyle. Greenfield sites allow for master planning to occur, which should see good design outcomes, an integrated space in terms of amenities and an ease to roll out developments at scale.
	Drawbacks are clearly the intrusion into areas known for their agricultural, environmental and tourism value and far greater costs to infrastructure provision. Much of the greenfield development we see in Mount Barker is not consistent with the principles of living locally. There is very little provision for public transport with most families having to rely on at least two vehicles and associated costs. The carbon and ecological footprint of new development is significant.

For discussion	Council comment
How can infill development achieve an urban form that is consistent with the principles of Living Locally?	Infill development should more readily be able to achieve the principles of Living Locally by concentrating urban footprint.
	A number of urban renewal projects through Adelaide (e.g. Bowden) show excellent levels of connectivity to mass transit options, green spaces immediately adjacent, active transport corridors and with far reduced car dependency. This model centres on public transport and mixed uses. There is potential for infill developments of this type through Mount Barker.
What do you see as the benefits and potential drawbacks of infill development?	Infill development can encounter issues with integration to established areas, scarcity of land and community sentiment.
Where is the next generation of strategic infill sites?	Mount Barker district is very limited in its potential to provide strategic infill opportunities as land is largely constrained by landform characteristics, accessibility and infrastructure provision.
What are the most important factors for the Commission to consider in meeting future demand for employment land?	A summary of the issues identified in Council's township plan for Callington identified factors as:
	Council's endorsed township plan for Callington seeks to facilitate further Employment lands surrounding the township, and in this regard Council is supportive of land near to Callington being identified as an 'Employment Growth Investigation Area'. The Discussion Paper also identifies that the provision of future employment land will be required where population growth is anticipated, including in Mount Barker. In the likely development of this space, Council would like to see the learnings of existing industrial and extractive land uses on nearby small residential townships taken onboard.

For discussion	Council comment
What are the most important factors for the Commission to consider in meeting future demand for open space?	Open space needs to be of sufficient size and quality to enable a diversity of community uses and for nature to thrive. Quantity is important as is how these areas are designed, connected and maintained. The maintenance burden on Councils is significant. Open space that is of a good size and includes quality features will allow for use across a broad spectrum of society as Greater Adelaide grows. Equitable access is a key factor.
What are the most important factors for the Commission to consider in reviewing and achieving the Urban Green Cover Target?	Mount Barker is recognised by established residents and those new to the area as a well treed and aesthetically pleasing place to live and raise a family. It is known, however that many new house blocks do not have room for the tree types that would provide substantial tree canopy cover. Even in established areas of Mount Barker, tree canopy cover is around 20%, which is less than envisaged in previous iterations of the 30 year plan. At the same time, there is a concern among the community that tree and biodiversity loss are altering the ecological sustainability, liveability and identity of the area. Stronger planning controls regarding trees for inner and outer metropolitan areas are needed to address this.

Conclusion

We would welcome further input into the development of the Greater Adelaide Regional Plan should the opportunity arise. Please contact me should you have any further questions on the details below.

Yours since	Alv	
GENERAL M	NAMAGER PLANNING AND COMMUNITY	
Direct No. E-mail:		

13 November 2023 Our ref: 6061179



Mr Craig Holden, Chair State Planning Commission C/ Growth Management Team, Planning and Land Use Services Department for Trade and Investment

via email <u>plansasubmissions@sa.gov.au</u>

Dear Mr Holden

Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to provide comment to the State Planning Commission on the Greater Adelaide Regional Plan (GARP) Discussion Paper. Please find attached to this letter our detailed submission which was considered and endorsed by Council's Strategic Directions Committee at its meeting held 7 November 2023.

We note the GARP Discussion Paper asks, 'how should Greater Adelaide grow', and 'where should Greater Adelaide grow' to accommodate projected growth across the state.

In terms of answering 'how should Greater Adelaide grow', our community are calling for us to continue our commitment to respond to the impacts of climate change, reduce emissions and build community resilience. A strong response to climate change and a focus on sustainability is key to maintaining liveability in Greater Adelaide, managing risks and reducing future costs.

Council in 2020 prepared and adopted the Onkaparinga Local Area Plan (OLAP) to guide growth in our city through its Strategies and Actions. We believe that the OLAP is a well-grounded and evidence based strategic framework and are confident in our growth direction for our city for the foreseeable future.

We acknowledge there are constraints to growth in our city in the 16-30 year period discussed in the GARP however it is our responsibility to ensure the protection of our available rural areas against urban expansion pressures. On this basis we recognise the need to continue with appropriate infill housing and the opportunities to re-examine growth within and around our centres, in particular Noarlunga Centre.

Whilst our submission captures a broad range of issues, we are hearing consistently from our community for the need for sustainable and climate resilient housing, for better urban and built form design, and the support of employment growth and land supply. Our concern however is the disconnect between the State Planning Policies and Regional Plans such as he GARP and the implementation tools (the Planning and Design Code) available at the development assessment interface to leverage results reflective of these aims.

Our submission is influenced by our ethos to ensure our community is well represented, is well informed, and has the opportunity to be heard in matters that directly affect them. We welcome further opportunities to work with the Commission and the Growth Management Team to inform and deliver the Greater Adelaide Regional Plan that the community is calling for.

Should you have any questions or wish to discuss further the matters raised above, please do not hesitate to contact Renée Mitchell, Director Planning and Regulatory Services on

Yours sincerely

Phu Nguyen
Chief Executive Officer

Attach: City of Onkaparinga submission to GARP Discussion Paper

CITY OF ONKAPARINGA SUBMISSION

THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

PART 1 HOW SHOULD GREATER ADELAIDE GROW?

Outcome

For discussion

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?

Improve urban tree canopy

The tree canopy across the Greater Adelaide area continues to decrease and the Planning and Design Code requirements remain inadequate.

While several zones in the Planning and Design Code (Code) requires development to provide new trees, there needs to be a requirement for greater open space areas to support medium and large trees in future developments to consider a future canopy in suburban areas.

Sustainability / climate resilience

With wilder weather predicted in future decades, upgrading building specifications for codes relating to bushfires, stormwater and wind speeds will be essential to maintain assets.

For climate ready buildings and sustainable development outcomes, the associated performance objectives (PO4.1-4.3) in the 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 onground.

Whilst the previous Regional Plan set the policy framework and targets that filtered into other parts of government, onground action is still lagging. This new Regional Plan needs to be different and more specific about the key mechanisms that will enable this change to occur.

This plan is to 2050+. 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 greenfield), we need to consider the climate conditions a century into the future – this is how long the effects of our decisions will be felt.

We must choose to build in resilience for new neighbourhoods, and take this opportunity now to build sustainable, liveable, healthy and affordable growth areas for our future.

Design for environment

To deliver 'greener, wilder and climate resilient environment' we need to see minimum disruption to our existing natural systems, trees, native habitats, landform and topography; these elements must be retained as much as possible.

We need to ensure the design process considers these elements and occurs prior to and leads the development assessment process. This design thinking process needs to inform 'Master Planned Communities' through structure plans and/or concept plans and can be integrated into the GARP and further via inclusion in the Code.

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? The GARP Discussion Paper provides little detail on the State Government's vision and role in providing social housing across the Greater Adelaide region to address housing affordability and increasing homelessness issues.

Social planning (broadly encompassing social/community infrastructure, access and inclusion, and the social outcomes of urban development – health and wellbeing, safety, social interaction, connection, and belonging)

The Discussion Paper identifies creating *A more equitable and socially cohesive place* as one of its four pillar outcomes of how Greater Adelaide should grow. It will be important to provide real mechanisms in the GARP and flowing through into the Planning and Design Code for how to achieve this, especially in light of the proposed satellite city approach to urban growth where:

- housing affordability is linked to distance from the CBD (equitable housing type and location choice) - state government needs to set aside sites across SA for social, subsidised and/or affordable housing
- long commute times could greatly impact living costs if a wide range of employment and service access opportunities are not sufficiently localised, lots of which relies on the private market (eg Bowden does not have a GP clinic or pharmacy).
- social isolation (from family, friends etc) could result from a decision to relocate to a satellite city for reasons of affordability, employment, or other reasons.

This is supported by the following statements in the GARP DP:

- distribute sufficient employment lands to meet local demand for jobs and reduce travel distances, and
- identify areas for mixed-use developments that bring together housing, jobs and lifelong learning.

Cultural heritage (First Nations)

The GARP Discussion Paper recognises 'SPP 7.2 is: Recognise and protect Indigenous cultural heritage sites and areas of significance' through the statement *of reconciliation, including voice, treaty, truth* under one of its four pillars around creating a more equitable and socially cohesive place.

We believe this should be followed through into real mechanisms for better considering First Nations' perspectives in how greater Adelaide grows, and how and where the associated urban development occurs. A commitment should be made in the GARP to better balance Aboriginal heritage protection and providing for the housing, employment, recreation and service needs of our growing population.

As there is no formal referral in the planning assessment process for Aboriginal heritage matters, we are concerned there is a disconnect between the state government's roles of approving development and protecting Aboriginal heritage. The cultural heritage significance of a place must be understood before development occurs considering the Code does not proactively identify the extent of a place's cultural heritage significance.

This position is supported by reference in the GARP DP 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.

Movement and Place Approach (road safety)

It is concerning that the GARP Discussion Paper makes no 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.

We draw the Commission's attention to South Australia's Road Safety Strategy to 2031, where the "Principles for decision making and investment" 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".

Another 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 embedding 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.

Any contemporary land use planning policy must acknowledge the Movement and Place Approach as a foundation towards harmonising the transport networks that serve urban development to be safe and inviting for all road users.

The Movement and Place Approach generally requires:

- applying the Safe System Approach for all roads
- a maximum 30km/h speed environment in residential areas which is considered to be a "survivable" speed for pedestrians and cyclists should they be impacted by a moving vehicle
- reducing the dependence of private motor vehicles for the movement of people
- increasing access to public transport that is frequent, convenient and reliable, and
- more opportunities for active travel, including emerging movement opportunities such as e-bikes and micromobility.

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?

Urban activity centres

Strengthening regional centres to the north and south to accommodate projected population growth and encourage further decentralisation of business and government services from the city centre, supporting the living locally concept.

Connectivity - increase trails that connect suburbs to centres and key transport infrastructure (e-bikes/e-scooters are on the rise).

Sustainable development outcomes (although adding some upfront construction costs) are required in both residential and commercial to reduce ongoing costs of living / business pressures for life of buildings.

Consideration given to supporting the share economy – particularly car sharing and workspace sharing opportunities.

Peri-urban region

Within the Greater Adelaide region some 89 percent is outside of the urban footprint – we consider that greater attention needs to be given to the importance of the peri-urban region. The region is a popular place to live, provides substantive employment and wealth creation for the state, is a major tourist attraction and main water catchment for metropolitan Adelaide. It is also a highly productive food area for Greater Adelaide.

Onkaparinga is uniquely placed having both an urban area accommodating 10 percent of the state's population, together with a substantial rural area accommodating world class wineries and tourism development offerings.

A coalition of councils with shared interest has considered what the peri-urban region means to Greater Adelaide. It was identified there is a need to bring back a focus on the peri-urban region as a sub-region with overarching objectives and outcomes - similar to the previous Outer Metropolitan Adelaide Region Plan within a previous iteration of the Planning Strategy.

We consider there needs to be greater acknowledgement of the peri-urban region in the GARP about the significance of employment it provides, its economic value and the need for protection as a food source for the state.

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? Housing choice and diversity is needed - single person households have increased 78% since the 1990s, and we are also facing an ageing population.

To achieve infill targets, more policy needs to be provided to encourage precinct infill development and further regulate small-scale ad hoc infill.

The Greater Adelaide region lacks high end housing estates / apartments to attract high-net-worth migrants where employment opportunities are. The creation of quality mixed use environments is important for SA business attraction and the economy, meaning these families are likely to look to other states for opportunities.

PART 2 WHERE SHOULD GREATER ADELAIDE GROW?

Where For discussion

Living Locally

What neighbourhood features enhance living and working locally?

Living Locally is identified in the Discussion Paper as a preferred approach to urban form. Living locally needs to be supported through lifestyle amenities:

- accessible / walkable tree-lined streets
- quality open space, socialisation spaces
- access to quality public transport
- access to high-speed internet connections
- opportunities to connect with the local community
- goods and services (business/shopfront activation, finegrain retail along a high street), and
- employment areas that are connected to goods and services and quality public realm.

In addition, real mechanisms, including those that influence market factors, will need to be in place to achieve sufficient local provision of employment, education, social service and convenience (retail, entertainment etc) opportunities to achieve this vision. 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.

We consider the GARP should concern itself with these factors so there is not a mismatch between its focus on satellite growth areas and living locally.

Greenfield and satellite city growth

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally? Requirement for greenfield (and significant infill development) to have urban design guidelines to inform development and build character.

'Working from Home' and 'Lifelong Learning' trends have changed the weekly spending pattern now favouring the suburbs over the CBD; so housing design needs to cater for more home offices / studies.

Consideration needs to be given to the share economy (like share car concepts) so there is not the need for multiple car households, but cars can be rented locally. Co-working hub cafes will be on the rise in future commercial spaces.

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

It is critical that employment within future 'satellite cities' is created, and likewise other services for future (and existing) communities are provided to deliver the living locally concept.

Without this, and noting that transportation is the largest contributor to greenhouse gas emissions in the state, it would incongruous to develop greenfield areas at Murray Bridge,

Goolwa, and Victor Harbor, which is likely to only encourage further reliance on long commute times. What do you see as the A commonly held drawback is that traditional greenfield benefits and potential development comes at a financial and environmental cost to drawbacks of greenfield the community. development? Our issue is the real disconnect between the high level strategic aims and objectives outlined in both the existing 30 Year Plan for Greater Adeliade 2017 Update and the SPPs (all of which contain sound aspirations) and the tools available at the development assessment interface to leverage results reflective of these aims. On this basis, the GARP provides the opportunity for the following sustainable outcomes for development to be built into the Code and/or planning system: commitment to environmentally sustainable design principles housing which meets the new Green Star for Homes standard OR minimum 8-star NatHERS rating low carbon house design and build zero/low waste, recycled materials, circular economy integration of renewable energy achieving net-zero energy use rainwater capture and use of recycled water water sensitive urban design (WSUD) trees and urban greening on private and public land functional open green spaces for community wellbeing and recreation biodiversity and habitat creation highly walkable suburbs with convenient access to public transport and connections to services diverse housing choice that delivers both high-end and affordable living increased community engagement in the planning process development and urban design that complements the surrounding landscape training and capacity building in sustainable design and construction for developers, builders and homebuyers use of local businesses and service providers. **Emergency services planning**

As greenfield areas expand closer to rural areas, there needs to be early conversations around hazard exposures and risk management with the relevant service providers.

These conversations need to identify and program the standard service level before rezoning.

Cemeteries

Figures provided by Adelaide Cemeteries Authority record that in South Australian deaths are consistently 80 percent in the metropolitan area and 20 percent in rural areas which reflects population spread.

There were 15,009 recorded deaths in South Australia in 2021/22 and based on University of Adelaide modelling (July 2018) there is projected to be 26,000 - 30,000 annual state deaths by the year 2050.

Within the City of Onkaparinga there is six operational cemeteries however there are limited spaces available. We have been approached by Adelaide Cemeteries Authority in order to identify possible locations to accommodate demand for burials.

As the City of Onkaparinga continues to grow, we also need to accommodate this demand for burials and set aside land for this purpose.

Waste Resource Facilities

The Southern Region Waste Resource Authority (SRWRA) is an integrated waste and recycling facility that includes South Australia's largest and most technically advanced Materials Recovery Facility.

SRWRA is a regional subsidiary established by the Cities of Onkaparinga, Marion and Holdfast Bay, under the Local Government Act 1999 and is responsible for providing and operating waste management services to the three Councils.

As one of the State's major landfill operations, SRWRA currently receives over 100,000 tonnes of waste annually with approximately 65,000 tonnes going to landfill. Whilst trying to realise a significant reduction of waste to landfill through its Materials Recovery Facility, it is acknowledged there will always be a place for landfills to dispose of residual streams that cannot be recycled.

On this basis, additional land for receiving waste needs to be identified in our plans for growth.

Infrastructure

Greenfield sites by their nature are located at the outer fringe of urban areas – there are challenges to provide appropriate standards of infrastructure and services in greenfield locations. The provision of essential infrastructure and services is borne by both developers and government.

Outer suburbs and new growth areas offer the most affordable homes to purchase but are not necessarily affordable living because they are less connected and therefore offer fewer opportunities for services and employment.

To provide residents with access to employment, services and amenities, considerable new investment is needed in many types of infrastructure, including utility (potable water, sewer etc), roads and public transport, schools, hospitals, community infrastructure and telecommunications.

The City of Onkaparinga has experienced and continues to experience housing first and without the proper support of all infrastructure – the lack of sewer at Sellicks Beach, traffic issues through the Seaford region, lack of public transport to Aldinga.

We suggest more work needs to be done with state agencies in particular transport, health and to some extent education regarding supporting future communities in greenfield developments.

We note Infrastructure Schemes have been 'introduced' into the planning system – there is an urgent need for the schemes to become operational.

The historical lack of infrastructure planning, coordination and funding has been recognised by the state government with the creation of Housing Infrastructure Planning and Development Unit (HIPDU) as a response.

Whilst we are pleased with this, HIPDU, like councils, needs to be given the appropriate tools and mechanisms to ensure the timely delivery of infrastructure and services to support new communities.

Urban infill growth

How can infill development achieve an urban form that is consistent with the principles of Living Locally? There needs to be a requirement for infill development to have urban design guidelines to inform development and build character.

Likewise, the focus of infill development should be surrounding or in activity centres rather than stretching along corridors – better strategic thinking and understanding of how infill areas can connect with existing regional and local centres, employment lands, walking and cycling networks and open space, green corridors, and infrastructure is needed.

Urban design in urban infill

What COCID-19 lockdowns taught us is that more space is required (eg balconies, yards and garages) in homes, wider / greener streets for business activations (eg outdoor dining areas) and accessible outdoor recreation spaces.

The GARP Discussion Paper provides limited comment on urban design and its role in guiding development, by reinforcing built and landscape character and delivering diverse housing types into the future.

The Planning and Design Code provides limited guidance on design, providing a limited resource to assess and achieve quality-built environment outcomes.

We would welcome better urban design outcomes being directed by the GARP and provided within the Code.

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

Infill development utilises existing services and offers upgrades to existing communities.

However, this also places capacity pressure on existing infrastructure (both soft and hard) – without mechanisms to fund and deliver the required upgrades and services, the community's acceptance of infill development will continue to be questioned.

Strategic infill sites

Where is the next generation of strategic infill sites?

We support the notation of larger strategic infill sites that allow for better design due to scale and opportunities for coordinated rather than piecemeal regeneration and which can be considered significant developments and ultimately trigger the 15% affordable housing requirement.

Regenerated neighbourhoods and urban activity centres

Neighbourhood regeneration refers to areas with housing stock that can benefit from redevelopment over time. These include locations with higher concentrations of ageing public housing that are in need of renewal.

With large areas in the City of Onkaparinga identified in the GARP Discussion Paper as opportunities for regenerated neighbourhoods and urban activity centres, it will be important to achieve good design outcomes from higher density developments that make positive contributions to the community's health and wellbeing.

Public housing areas in Christie Downs and Noarlunga Downs are in near proximity to Noarlunga Centre (activity area) and Lonsdale (employment area) and public transport.

Older suburbs close to beaches and suburbs with infrastructure and amenity capable of supporting further infill should be priority areas.

These areas could increase housing density through considered precinct infill and are in much need of rejuvenation.

It will also be important that this regeneration is not targeted as gentrification, reducing the provision of social and affordable housing in these established suburbs.

Urban activity centres were identified as transit-oriented developments in the 2010 30-Year Plan for Greater Adelaide however market conditions then were not conducive to delivering higher-density residential development in these locations. They also require much greater planning and coordination due to fragmented land ownership, and the need for improved local infrastructure and design outcomes.

Noarlunga Centre

We consider there is an opportunity to revisit the Noarlunga Centre for increased residential and other commercial sectors. Market conditions have changed since previous market sounding was undertaken and new demand is emerging.

Noarlunga Centre is ideally located near/on a train station (public transport), a large shopping complex and nearby hospital/medical services – public infrastructure is already in place to support development/growth and has the potential to act as Adelaide's second CBD in years to come and has ample vacant land to support mixed use development in the precinct.

General infill

The Commission's view is that general infill needs to be better targeted to areas with infrastructure capacity, and areas which would benefit from renewal and greater housing choice. New housing forms and future living models will need to meet community expectations and preserve valuable heritage and character areas.

Council introduced policy for infill (and medium density housing) in 2010. From our experience infill has occurred in a broad manner and has yet to deliver the benefits it can bring.

Ideally, infill is provided through a strategic roll-out that focuses on selected areas in order to deliver the built form and densities to create the desired walkable suburb with tree lined streets and activation of centres.

Whist we support infill as a form of future housing development, we consider there is a need to limit the amount of ad hoc infill. Appropriate infill development can be achieved through supporting precinct infill in strategic locations that support public transport, green spaces and activity centres – a key factor in this however is the funding, timing and provision of infrastructure for infill developments, which at this time remains lacking and an ongoing concern.

Employment lands

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

Record low Onkaparinga industrial and commercial vacancy rates and extraordinary growth in business rents across Onkaparinga (particularly Lonsdale) has led to an industrial development boom, greater than that anticipated in the Outer Southern Adelaide Employment Lands projections in the Land Supply Report for Greater Adelaide, published 2021.

Noting the recently announced southern residential land releases, there is little to no mention of commercial and industrial capability (eg locations for future local Jobs).

We consider it is critically important to balance additional housing with job availability; local employment land consideration as part of this is critical.

The following factors need further exploration:

- planning controls are not keeping up with modern fastmoving / pivoting industries trends (eg vertical warehousing)
- more front-end preliminary advice and prescribed design reviews for planning to respond to emerging trends
- we are seeing more demand for 'white collar' and 'automated' factories with fulfilment centres / warehouses with amenity to attract a higher skilled workforce development of data centres, tech clusters, SMART grids, intelligent offices etc emerging within traditional industrial areas.

Port Stanyac

Lonsdale is our lead industrial precinct and Port Stanvac is crucial to its growth and future employment land for our city.

Port Stanvac is a once-in-a-lifetime development opportunity. The site has an unmatched potential with its size, position / location and environmental/biodiversity features. To ensure Port Stanvac's full potential is met, a structure planning process is required to be undertaken.

Prioritising industrial opportunities for Port Stanvac, balanced with areas of open space / biodiversity and supporting land uses will ensure our city can continue to grow, create jobs and attract new investment.

Open space and urban greening

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

We note the re-emergence of the Metropolitan Open Space Scheme. We support open space being connected to an open space network that provides extensive tree canopy, biodiversity linkages, strong accessibility to residents and providing quality public amenity through shelters, seating, public art, landscaping and lighting.

We also note there are five east-west green corridors from the Hills/Willunga escarpment to the Coast. We consider there is an opportunity through the GARP to promote future north-south green corridors to create regional green network linkages for recreation, native vegetation retention, native regeneration and habitat corridors.

What are the most important factors for the Commission to consider in reviewing and

Urban tree canopy is critical for mitigating urban heat islands, but despite strong efforts from local governments who have been planting tens of thousands of trees each year, Adelaide's overall canopy is declining. The primary cause of this decline is

achieving the Urban Green Cover Target?

tree removal on private land driven by urban infill coupled with weak site coverage and soft landscaping requirements.

Currently, Adelaide has the weakest tree protection laws of any Australian capital city, which protects only the largest trees, has a myriad of exemptions that voids protection for many of those trees, and a lack of an adequate tree valuation mechanism to facilitate investments in canopy 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.

In support of our environment and urban trees, we also need stronger protection of land for biodiversity conservation and natural systems – parks, riverine corridors, coastal areas – as such it is pleasing to see the intent to re-establish the (former) Metropolitan Open Space System.

DTI:PlanSA Submissions

From: Sara Hobbs

Sent: Thursday, 26 October 2023 1:28 PM

To: DTI:PlanSA Submissions

Cc: Greg Pattinson

Subject: Submission - Greater Adelaide Regional Plan Discussion Paper

Attachments: City of Playford_Submission to GARP Discussion Paper_October 2023.pdf

You don't often get email from Learn why this is important

To whom it may concern

Please find attached the City of Playford's submission on the GARP Discussion Paper, which was endorsed by Council on Tuesday 24 October.

We welcome the opportunity to discuss any of the matters raised in the submission with you.

Please contact Greg Pattinson, Executive Strategic Advisor, or me for further information.

Kind regards Sara



Sara Hobbs Strategic Land Use Planner

12 Bishopstone Road, Davoren Park, SA 5113

playford.sa.gov.au

playford.sa.gov.au/stayconnected

We acknowledge that we work on Kaurna Country and pay our respects to the Kaurna people and their ongoing spiritual connection to country.



Table of Contents

1. In	troduct	ion	2		
2.Ec	onomi	Growth	4		
	2.1	Elizabeth Centre as the 'CBD of the North'	4		
	2.2	Greater Edinburgh Parks (GEP)	5		
	2.3	North-West Economic Corridor	6		
	2.4	Edinburgh Defence and Aerospace Precinct	7		
	2.5	Playford Health and Wellbeing Precinct	8		
	2.6	Gawler River Flood Protection	9		
	2.7	Knowledge Intensive Industries	9		
3.Inf	nfrastructure				
	3.1	Greenfields development	11		
	3.2	Rapid Mass Transit	12		
	3.3	Sewering	12		
	3.4	Transport Improvements – Residential Growth Areas	13		
4.Re	sidenti	al Growth	16		
	4.1	Strategic Infill and Neighbourhood Renewal	16		
	4.2	Future Residential Growth – Land South of Riverlea	17		
	4.3	Urban Growth Capacity in Angle Vale	18		
5.Cli	mate a	nd Greening	20		
	5.1	Impacts of Climate Change	20		
	5.2	Key Corridors and Open Space	20		
	5.3	Tree Canopy	21		
Appe	endix A	: Economic Capabilities			
Appe	endix B	: Transport Upgrades			
Appe	endix C	: Residential Densities and Renewal			

1. Introduction

The Playford Community Vision 2043 reflects our community's aspirations for a vibrant, sustainable, connected, healthy and prosperous lifestyle, consistent with the Discussion Paper's four outcomes and aspirations for Greater Adelaide.

The 30-Year Plan for Greater Adelaide (2010) identified significant new land supply for urban growth in City of Playford, which resulted in the City experiencing intense greenfield residential development, with farmland rapidly transforming into housing estates. It is anticipated that around 25,000 new homes will be built over the next 25 years. The City of Playford's current population is 105,000 which is projected to reach 153,000 by 2041, equating to seven people a day moving into our community.

The Discussion Paper advocates for the concept of 'Living Locally' where housing, jobs and services are located closer together so people can meet most of their daily needs within a comfortable walk, ride or public transport journey from home. These principles need to underpin future urgan growth in Playford where greenfields development is the prominent form of development.

The City of Playford is integral in servicing the northern region and is home to key community, health, retail and civic services, with the Elizabeth CBD being the focal point. A revitalised Elizabeth CBD is needed to meet the demands of Playford's rapidly growing community as well as growing populations further north in councils such as Gawler and Adelaide Plains.

Concerted focus is required to ensure that the employment lands at Greater Edinburgh Parks identified in the existing 30-Year Plan for Greater Adelaide are realised to support local job growth in line with local population growth.

Playford's access to the national highway network, port facilities and interstate railway provides the foundations for economic development and job creation, with our submission highlighting the potential of the North-West Economic Corridor. The expansion of the Edinburgh Defence and Aerospace Precinct will also provide a strategic advantage to SA's defence capability.

To achieve the aspirations identified in the Discussion Paper, improved coordination, staging and funding of infrastructure to support urban growth is critical in ensuring both the State's outcomes and Council's Community Vision can be achieved.

The implementation of deeds at Virginia, Angle Vale and Playford North Extension contribute towards the funding of stormwater, transport and social infrastructure and has been a positive step in ensuring developers are contributing to the costs of growth. However, there are issues with the timing of transport upgrades lagging behind the need, indexation not keeping up with inflation and the deeds only covering around 30% of the cost of the social infrastructure. There is also a lack of planning for State-provided infrastructure such as schools.

The absence of staging in our growth areas has created islands of urban development that are disconnected by rural roads that lack stormwater, lighting, footpaths and cycle

infrastructure and are not designed to accommodate higher volumes of traffic. Limited consideration has been made for public transport, which is creating car-dependent communities that do not reflect the Discussion Paper's vision for 'Living Locally'.

Growth is also impacting broader regional infrastructure, with key transport routes under significant pressure due to increased traffic volumes associated with population growth. Investment is required to improve east-west road connections including Curtis, Womma, Dalkeith and Angle Vale roads.

Council's need to deliver new and upgraded infrastructure is placing a high burden on our rate payers. Whilst Council has a role to play in contributing towards infrastructure provision, it is inequitable for Playford ratepayers to be subsiding growth to such a significant level, on behalf of Greater Adelaide.

It is acknowledged that the City of Playford is integral in meeting the need for new housing in Greater Adelaide. However, this needs to be achieved in a sustainable way, ensuring these new communities achieve the objectives of the Discussion Paper and principles of 'Living Locally'.

The City of Playford welcomes the opportunity to work with the State Government, key agencies and developers to achieve the best possible outcomes for our community. We ask to be involved in any investigations that impact Playford.

2. Economic Growth

Refer to the map at Appendix A for a spatial overview of Council's economic capabilities.

2.1 Elizabeth Centre as the 'CBD of the North'

Proposal for the GARP

- That the Elizabeth Centre is identified in the GARP as the 'CBD of the North' in recognition of its role in servicing the northern populations of Greater Adelaide.
- That the Elizabeth CBD is identified within the GARP for expansion and increased residential densities subject to investigations that include extent of boundaries, transport networks, mix of land uses, minimum height limits and car parking rates.

A vibrant and revitalised Elizabeth Central Business District is a key aspiration in the Playford Community Vision 2043. The vision for the Elizabeth Centre is to support the northern region's growing population as the central service centre.

Data provided by Elizabeth City Centre¹ reveals that 66% of customers come from outside of Playford with 49% coming from northern locations in Gawler, Adelaide Plains, Barossa and Light Council areas. The following map shows the spread of where customers live.



Council has led the realisation of the Community Vision through its investment into the CBD with the redevelopment of Prince George Plaza, construction of a multi-deck car park and the building of the new Grenville Hub (community centre). In 2021 Council went to the market seeking development partners for its vacant land holdings in the Centre. An innovation hub and indoor ice arena/recreation centre have received development approval and are undergoing planning assessment respectively, while discussions are ongoing with interested parties regarding the remaining Council-owned allotments.

The Elizabeth CBD is serviced by rail and a bus interchange with a range of retail, education, medical and community facilities. It is also adjacent to Fremont Park - Council's premier open space and civic space. A review of the CBD's existing boundaries, mix of land uses, minimum height limits, transport networks, car parking rates and increased residential densities is needed to maximise the potential of this precinct. The CBD is well placed to accommodate significant State services.

The vacant land to the west of the Elizabeth railway station is located within the City of Salisbury and was the subject of concept planning in 2011 by the Land Management Corporation (now Renewal SA), which envisaged a mix of retail, employment, institutional and residential development. Whilst the concept would now need revisiting, it broadly aligns with what Council envisages for this land. Given the amount of existing and future growth in the north, it would be pertinent to consider this land in any analysis of the Elizabeth CBD.

2.2 Greater Edinburgh Parks (GEP)

Proposal for the GARP

The GARP should identify GEP as employment land that is ready for development subject to rezoning and provision of infrastructure.

The GARP should identify the State Government's support for rezoning GEP and implementation of mechanisms to deliver regional infrastructure.

GEP is currently identified in the 30 Year Plan for Greater Adelaide as 'new strategic employment lands' (p.79) and appears to be represented on Figure 15 of the Employment Future Investigations map (p.158) of the Discussion Paper.

When fully developed, GEP has the capability to host over 37,000 jobs in industries such as advanced manufacturing, logistics and warehousing.

GEP is strategically placed with direct access to the national highway, rail networks and port facilities, emphasising the logistics role GEP can play in supporting Greater Adelaide and the South Australian economy. SCT Logistics has an intermodal facility within the precinct but there is capacity for a second facility on the southern side of the ARTC railway line.

Playford and the City of Salisbury have undertaken investigations into the infrastructure requirements for GEP and the key constraints preventing development is the lack of a suitable road network and regional stormwater infrastructure.

State support for rezoning of the precinct to employment lands and associated mechanisms to fund the necessary infrastructure (e.g. via infrastructure scheme or deeds) is required to realise the economic and employment potential of this land.

2.3 North-West Economic Corridor

Proposal for the GARP

Council supports further investigations in the area identified within the GARP Discussion paper as an Employment Growth Investigation Area.

The City of Playford and the City of Salisbury have identified the North-West Economic Corridor as a strategic employment area, located between (and adjacent to) the Northern Expressway and Northern Connector. The corridor is bookended by future residential growth hubs at Dry Creek in the City of Salisbury and Riverlea, which is in its early days of establishment. The Discussion Paper appears to have identified this area as an Employment Growth Investigation Area (p.158), which is supported.

The State Government's Employment Land - Land Supply Report for Greater Adelaide (June 2021) identifies the Outer North region as containing the largest source of future employment land within Greater Adelaide, representing 95% of total supply. However, Greater Edinburgh Parks accounts for the majority of this land supply. The North-West Economic Corridor provides an opportunity to expand the employment land supply by taking advantage of two key freight routes and providing job opportunities near to growing residential populations.

The corridor currently accommodates different land-use zones including Deferred Urban and Rural. Further investigations to define the scope of the corridor and understand infrastructure requirements is needed.

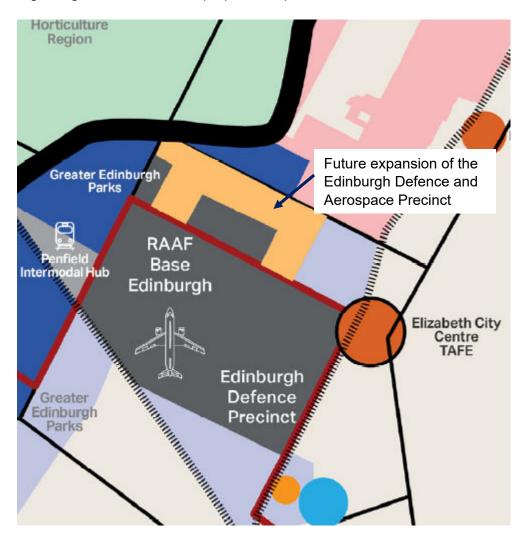


2.4 Edinburgh Defence and Aerospace Precinct

Proposal for the GARP

Identify this land for future defence-related activities, ensuring its protection and future proofing of Adelaide's defence industry.

Currently this land is identified in the 30 Year Plan as 'new strategic employment lands' (p.79) and should similarly be depicted in the GARP. The following map provides detail regarding the location of the proposed expansion area:



The Edinburgh Defence and Aerospace Precinct is a key national research and manufacturing hub. The Precinct is home to the RAAF Base Edinburgh – one of two superbases in Australia accommodating 5,000 military personnel, public servants and contractors; Defence Science and Technology Group; and major defence companies.

There is a strategic opportunity to expand the Defence and Aerospace Precinct into the land directly north of the RAAF Base. This will build upon the Department of Defence's investment into the 737 deep maintenance and modification facility next to the RAAF Base, which will allow for maintenance of the P-8A Poseidon to occur in Australia rather than offshore and further cement SA as the Defence State.

Expansion of the precinct will provide a strategic advantage to SA's defence capability, enabling:

- Job creation in the defence and aerospace sector;
- Controlled site access;
- Access to key transport linkages;
- Leveraging of specialised defence-related industries; and
- Avoidance of conflict with non-industrial activities.

It would also provide opportunity for less sensitive uses accommodated on the Base to be relocated to other locations within Playford such as the Elizabeth CBD or the Playford Health and Wellbeing Precinct.

2.5 Playford Health and Wellbeing Precinct

Proposal for the GARP

Identify the need to expand the Playford Health and Wellbeing Precinct to meet the needs of a growing population.

The Playford Health and Wellbeing Precinct accommodates the Lyell McEwin hospital – Playford's largest employer, with more than 5,000 staff – and a range of other facilities including Fluid Solar House: a commercial and office complex; the Elizabeth Vale Centre NorthWest development encompassing retail, multi-deck car park and specialist medical consulting and private hospital; and ACH Healthia: aged care complex and university training centre. Located within the Strategic Innovation Zone, the Precinct envisages private and public health services, allied health facilities, training and research capabilities and residential accommodation in addition to retail and commercial uses.

Council acknowledges the investment by the State Government in the upgrades to the Lyell McEwin Hospital to-date, but continued investment is required to meet the current health demands of our community and to service the growing communities in Northern Adelaide.

Our community's need for medical and allied health care services continues to increase with residents having to travel outside of the region for health services. The Playford Health and Wellbeing Precinct is strategically situated to serve the regional population well beyond Adelaide's northern suburbs. Currently servicing over 400,000 people, it is also the nearest tertiary public hospital for an additional 160,000 people living across country South Australia in the areas of Port Pirie, Yorke Peninsula, Riverland, Barossa Valley and Clare Valley.

2.6 Gawler River Flood Protection

Proposal for the GARP

The Gawler River should be identified within the GARP as requiring flood hazard mitigation measures to protect the Northern Adelaide Plains food-growing region and residential properties.

The Gawler River and surrounding region is subject to major flooding, averaging a flood once every 10 years over the past 160 year. The last major flood in 2016 was detrimental to the local economy at a cost of \$51M. Flood protection measures are required to protect existing urban development in the Town of Gawler, Light Regional Council, Adelaide Plains Council and the City of Playford.

Additionally, flooding from the Gawler River impacts horticultural areas within the Northern Adelaide Plains - one of Australia's most significant horticulture regions that produces 215,000 tonnes of fresh produce and over \$355 million in farm-gate value each year.

The Department of Environment and Water are working with affected councils to better manage flooding (information available from the <u>DEW website</u>) and a Gawler River Flood Mitigation Business Case is currently being prepared by DEW. The business case will identify the most appropriate flood mitigation measures.

2.7 Knowledge Intensive Industries

Proposal for the GARP

The GARP should identify Playford for future 'knowledge intensive' industries to support a growing and more educated community. The GARP should specifically acknowledge the following opportunities:

- Identify the Playford Health and Wellbeing Precinct, Elizabeth CBD, Defence and Aerospace Precinct and Lionsgate as supporting knowledge industries.
- The inclusion of the Playford Health and Wellbeing Precinct within the State's Innovation Districts.
- The need for a university presence in Playford.

Knowledge and Innovation Hubs

The Discussion Paper recognises the need for knowledge-intensive industries which are proximate to educated worker populations and that residential development is placing pressure on inner-City employment lands. Growth in knowledge industries is anticipated at locations such as Mawson Lakes, Lot Fourteen, Tonsley Innovation Precinct, Thebarton BioMed Precinct and Glenside Creation Industries (p.155).

Playford is not recognised in this section of the Discussion Paper but it is crucial that 'knowledge intensive' industries are encouraged in the north to support a growing population who have higher levels of education. This is evident in our new urban areas, which have seen growth in the proportion of people with university qualifications and higher incomes compared with Playford more generally.

New industries at GEP and defence-related industries (refer Sections 2.2 and 2.4 respectively) will also require an educated workforce. The <u>Malinauskas Government has adopted an innovation model</u> to connect the State's innovation districts, which includes the Edinburgh Defence and Aerospace Precinct but could also extend to the Playford Health and Wellbeing Precinct. The Health Precinct Master Plan and existing Strategic Innovation Zone envisages health-related training, research and allied health facilities as well as residential accommodation around the Lyell McEwin tertiary hospital.

Lionsgate Business Park supports existing and emerging businesses, many of which utilise science and technology to support their production, such as defence manufacturer, Levett Engineering. The 123 hectares site represents a significant opportunity for technology and innovation businesses to establish themselves and provide jobs for a range of knowledge workers.

University Presence

Over the last 20 years nearly half of all new jobs required a bachelor's degree or higher. This trend is set to continue and in the future most jobs will require some form of post-secondary school education. High levels of educational attainment are associated with increased employment opportunities, higher wages and improved wellbeing as well as contributing to local economic growth.

At the last Census only 8% of the Playford community had obtained a university degree compared with 26% for Greater Adelaide.

The presence of a university in Playford will help address barriers to further education that people from the north face, which include (but are not limited to) distance, lack of access to transport and stigma associated with coming from the north. A location within the Elizabeth CBD would be ideal.

3. Infrastructure

Refer to Appendix B for a map of proposed transport improvements.

3.1 Greenfields development

Proposal for the GARP

The GARP should identify the need to explore various funding mechanisms and legislative changes to address the challenges described below. The City of Playford would welcome the opportunity to work with the State on this type of project. Some options could include:

- Changes to the planning legislation (e.g. to support more efficient and equitable contribution towards infrastructure requirements);
- Commitment to the early provision of regional infrastructure;
- Incentives to achieve land amalgamation in growth areas;
- Ensuring detailed structure planning is undertaken prior to land being rezoned for urban development.

The Discussion Paper identifies the disproportionate cost of servicing greenfields development compared with infill development in inner metropolitan locations (p.95).

The Virginia, Angle Vale and Playford North Extension growth areas have deeds for Stormwater, Transport and Social Infrastructure, which developers contribute towards. However, there are a number of issues with these deeds, with major ones being:

- Currently the Department of Infrastructure and Transport does not debt-fund transport improvements, meaning the implementation of road infrastructure is lagging well behind the need and community demand as it is reliant on collecting contributions that cover the entire costs of the upgrades before works are undertaken.
- The indexation stipulated in the deeds is not keeping up with inflation.
- The Social Infrastructure Deeds' developer contributions are only around 30% of the cost of the infrastructure.
- The Social Infrastructure Deeds do not address State-provided infrastructure such as state schools and emergency services facilities. There has generally been a lack of forward planning for these facilities, particularly with regards to securing of land.

The lack of staging has created islands of urban development that are disconnected by rural roads which do not provide stormwater, lighting, footpaths or cycle infrastructure and are not designed to accommodate higher volumes of traffic. Excluding Riverlea, no consideration has been made for public transport. As such, car-dependent communities are being created which does not align with the Discussion Paper's vision for 'Living Locally'.

More generally, the planning system has few levers to compel developers to provide quality infrastructure. A long-standing example is that the Planning, Development and Infrastructure Act requires 12.5% of open space to be provided in subdivisions over 20 allotments but does not require the development of that land into useable open space. As such, the quality of

open space varies significantly across Playford's growth areas. Other elements that create sustainable and liveable communities such as planting of street trees, landscaped verges, WSUD systems, cycling infrastructure and public lighting are all by negotiation.

Additionally, Playford expends significant human and financial resources to try to manage growth and address these infrastructure shortfalls, resulting in an inequitable and disproportionate burden on our rate payers.

3.2 Rapid Mass Transit

Proposal for the GARP

- Identify the need for rapid mass-transit that will link future residential populations at Dry Creek; employment lands within the North-West Economic Corridor and GEP; and residential populations at Riverlea.
- Identify the need for investigations to be undertaken to determine a suitable solution and ensure the required land corridor is adequately protected.

Due to the residential growth occurring at Riverlea, Virginia, Angle Vale and Two Wells (the latter being in Adelaide Plains Council) and future growth earmarked for Dry Creek in the City of Salisbury – combined with future employment growth at GEP and within the North-West Economic Corridor – there is a need to identify a suitable future rapid mass transit corridor that is separate to the road network.

Without this, future traffic congestion issues will impact people's quality of life who live and work in the region as well as detrimentally impacting the environment through car emissions (notwithstanding the trend towards electric vehicles). A <u>2019 analysis</u> of Adelaide's traffic congestion by Infrastructure Australia found the annual cost of road congestion was approximately \$1.4 billion with north-south roads being the most congested (as at 2016). A <u>2023 benchmarking report</u> found that Adelaide was the only peer city where hours lost to congestion rose since 2019 (p.50).

It is therefore important that preliminary investigations are undertaken now to identify a suitable mass transit option to service future residents and workers and ensure that the required land corridor is protected.

3.3 Sewering

Proposal for the GARP

The GARP should identify the need for the provision of mains sewer to the existing townships of Virginia and Angle Vale and timely provision of mains sewer connections in the Virginia, Angle Vale and Playford North Extension growth areas.

The townships of Virginia and Angle Vale are surrounded by growth areas that will be connected to mains sewer, however the existing townships are serviced by on-site waste water systems and there are currently no plans to connect them into the mains sewer. This is preventing:

- Increased residential densities near the townships where services are located;
- Development of new commercial uses that are required to service the growing populations of these areas, reducing opportunities for local economic growth and job creation; and
- Unrealised return-on-investment from projects such as the Virginia Main Street Upgrade, where a lack of sewering will hinder commercial development.

Given the lag in SA Water timelines for providing mains sewer to some locations within the growth areas, developers are now contemplating the creation of subdivisions that do not have any sewer connections at all (will be on septic). This will require large blocks that will significantly reduce yields and be an inefficient use of land.

3.4 Transport Improvements – Residential Growth Areas

Proposal for the GARP

That the GARP identifies:

- The need for a second signalised or grade separated intersection from Port
 Wakefield Road to service Riverlea and any potential future growth area south of
 Riverlea;
- The need for upgrades to Curtis, Womma, Angle Vale, Heaslip and Dalkeith roads;
- The need for key intersections with NEXY and Main North Road (primarily for Curtis and Womma roads) to be upgraded to address congestion issues; and
- Improved public transport to service established urban areas and early provision of public transport to service growth areas.

Second Signalised or Grade Separated Access into Riverlea

A signalised intersection has been installed at the intersection with Port Wakefield Road / Riverlea Boulevard / Angle Vale Road as the main access into and out of Riverlea.

There is capacity to widen Riverlea Boulevard from four lanes to six and in the long term a grade separation to ease the pressure on this access will be required. However, it still is insufficient to have just one primary access into a development that will accommodate 12,000 households and 30,000+ people.

Therefore, a second access point will be required to service Precincts 3 and 4 of the Riverlea development. Moreover, it is imprudent to have just one main access into a development the size of Riverlea, particularly in the event of an accident that restricts movements through the existing intersection.

The Growth Investigation Area to the south of Riverlea that is identified in the Discussion Paper (p.127), provides further impetus for the need of this second access point.

Road Upgrades

The urban growth that was originally identified in the 2010 version of the 30-Year Plan for Greater Adelaide is placing pressure on Playford's road network, with many roads that previously functioned as rural roads or carried low levels of traffic now incompatible with the increase in volumes.

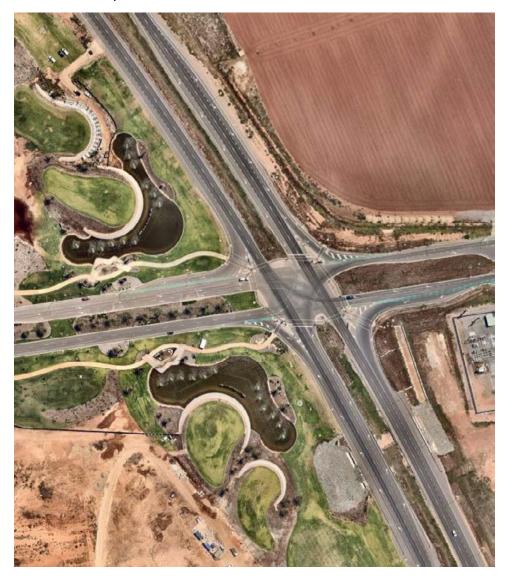
Outside of the Transport Deeds for Angle Vale, Virginia and Playford North Extension growth areas, the following road upgrades are needed as a high priority. Notably these roads are primarily facilitating east-west transit, which is generally poor due to the condition of the roads.

DIT Road	Comments	
Duplication of Curtis Road and grade separated crossing at Adelaide-Gawler Railway line.	This is Council's most congested road and Council is working with DIT to undertake a traffic analysis and planning work.	
Womma Road	Traffic volumes are increasing on Womma Road as a result of growth.	
Angle Vale Road	Traffic volumes are increasing on Angle Vale Road due to population growth including traffic generated by the new Riverbanks College super school.	
Heaslip Road	Traffic volumes are increasing on Heaslip Road due to population growth as well as being a main route to Adelaide from Angle Vale.	
Dalkeith Road (Town of Gawler Road)	Dalkeith Road is located within, and is under ownership of, the Town of Gawler but is experiencing increased traffic volumes due to population growth in the north as the main route from Angle Vale to Main North Road.	
	Additionally, it is one of only three east-west crossings over the Gawler Rail Line.	
Key intersections	The interchange / off ramps at NEXY (especially intersections with Womma and Curtis Roads) and numerous road intersections along Main North Road (including with Curtis Road) need investigations into their capacity and upgrade requirements.	

Public Transport

Improvement to public transport services within Playford is required so people who do not have access to a private vehicle or are unable to drive can access employment, services and other destinations. Improved public transport will also help to reduce the pressure on our roads and reduce carbon emissions. In new areas, early provision of public transport will help to avoid the creation of completely car-dependent communities. The key considerations are:

- Provision of early and improved public transport to service Playford's growth areas,
 with a focus on linking these communities to activity centres;
- Improvement to east-west public transport services across established and growth areas; and
- Consideration for express bus routes along NEXY and the Northern Connector to connect communities in the north to employment opportunities in the western and southern parts of Adelaide.



Existing signalised entrance into Riverlea

4. Residential Growth

4.1 Strategic Infill and Neighbourhood Renewal

Proposal for the GARP

New strategic infill and neighbourhood renewal sites identified in the GARP as per the map at Appendix C.

To maximise dwelling yields, minimum densities should be mandated for strategic locations around transport nodes, key activity centres and open space.

The Commission's Principles for Identifying Land for Housing and Jobs (p.101) are supported.

However, the map on page 141 of the Discussion Paper identifies a number of strategic infill and neighbourhood renewal sites within Playford which appear to include locations that are not supported by Council for residential development. The rationale for selecting these sites is not clear.



Playford's established Elizabeth suburbs accommodate a high proportion of dwelling stock that was built in the 1950s, 60s and 70s and requires urgent renewal. Dwellings are typically three-bedroom houses on large blocks which do not meet the needs of many people

including older people, people with disability, large family units or single person households. There is also a higher proportion of public housing in Playford (8.5%) compared with Greater Adelaide (5.5%) - but much higher in some suburbs, with Elizabeth South having the highest proportion at 29%.

Council has identified areas (refer Appendix C) that we believe are priority locations for renewal and increased residential densities. These locations focus on the following elements:

What	Why
Public housing renewal opportunities	High concentrations of public housing past their economic life in proximity to shopping centres, open spaces and public transport.
Higher residential densities (and mixed uses) around train stations	Potential for increased densities around Elizabeth South, Womma, Broadacres, Smithfield and Munno Para train stations, maximizing the existing investment in rail.
Higher densities around the Elizabeth CBD and Health and Wellbeing Precincts	These two precincts provide shopping, medical, open space and learning facilities as well as public transport links.

Residential densities generally need to be higher to curb the rate of urban sprawl and get the most return on the investment into infrastructure. Densities in our growth areas are currently around 10-12 gross (15-17 net dwellings) per hectare, which is very low¹. At a minimum, densities around activity centres and transit nodes should be significantly higher as per Policy 3 for 'Transit corridors, growth areas and activities centres' in the current 30 Year Plan for Greater Adelaide (p.42).

4.2 Future Residential Growth - Land South of Riverlea

Proposal for the GARP

Identification of land south of Riverlea for future residential growth in the GARP is only supported if:

- It is acknowledged this is a longer-term option when current growth areas in Playford have been significantly developed;
- It is informed by investigations identified below; and
- That detailed structure planning is undertaken.

The Discussion Paper identifies land south of Riverlea as a 'Proposed area of investigation: Greenfield and satellite city growth' (p.126).

¹ Government of South Australia (2006) <u>Understanding Residential Densities: A Pictorial Handbook of Adelaide Examples</u> (refer to page 5 for description for a table of dwelling densities).

This land should not be considered for development until land already zoned for urban growth has been largely developed. Playford currently has land zoned for residential development in multiple locations:

- Playford Alive
- Blakes Crossing
- Virginia
- Angle Vale
- Playford North Extension
- Riverlea
- Eyre

These separate locations and fragmented nature of land within many of these areas are creating significant infrastructure, staging and financial challenges for Council and our community.

It is therefore not feasible to further expand residential growth areas, noting that Council is already coming under pressure to support third-party Code Amendments for the land south of Riverlea.

Any future urban development south of Riverlea will need to consider the following key matters:

- Appropriate staging of growth and infrastructure provision
- How this land will be integrated with the existing Riverlea growth area
- The potential impact of loss of horticultural land
- Potential impacts on Aboriginal cultural heritage
- Stormwater and flooding mitigation requirements
- Transport needs road, public transport and active travel
- Identifying a best-practice funding model for provision of infrastructure
- Ensuring relevant State agencies, such as SA Water, DECD and DIT align their capital works plans with the staging of growth to adequately service the new community.

4.3 Urban Growth Capacity in Angle Vale

Proposal for the GARP

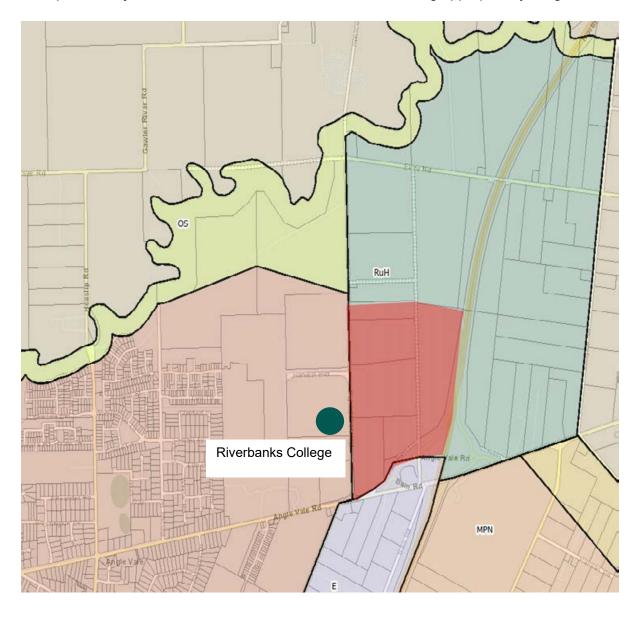
Investigate land identified below for potential future expansion of the Angle Vale growth area.

The land located between the Master Planned Township Zone at Angle Vale and the NEXY should be explored for future urban growth (identified in red in the below map) as it is well located with regards to:

- Riverbanks College;
- Shopping facilities at Angle Vale, Munno Para and Gawler and Elizabeth; and
- Key transport links for future public transport services.

The land is currently zoned for Rural Horticure but is limited in it horticultural uses due to its proximity to the school (e.g. cannot use sprays).

The remaining land to the north of the identified land would have potential for urban development subject to the flood risk from the Gawler River being appropriately mitigated.



5. Climate and Greening

5.1 Impacts of Climate Change

Proposal for the GARP

 Ensure that the impacts of climate change are considered when identifying new locations for residential growth.

The <u>Guide to climate projections for risk assessment and planning in South Australia</u> (2022) prepared by the Department for Environment and Water projects higher temperatures, more intense heavy rainfall events and rising sea levels for 2050 and beyond.

The flat northern plains of Playford (and northern Adelaide more generally) will likely be at the forefront of these trends, whilst also accommodating the majority of Greater Adelaide's urban expansion. There needs to be further consideration as to the appropriateness of the north as the primary urban growth area and how these impacts can be better mitigated.

5.2 Key Corridors and Open Space

Proposal for the GARP

- Identification of the Gawler River and Little Para River as key open space due to its environmental, recreation and cultural value.
- Identification of the Gawler Greenway as a key walking and cycling pathway.
- Recognition of the need for improved funding pathways for walking and cycling infrastructure.

Significant River Corridors

The Gawler River runs from Gawler to the coast. Sections of the corridor in Angle Vale and Riverlea will be developed as part of new residential growth but other sections will require State and local government investment to provide a single connected linear trail, noting much of adjacent land is in private ownership.

The Little Para River is located within the City of Salisbury and City of Playford and has significant biodiversity assets including important remnant vegetation.

Both of these rivers have capacity to be a major biodiversity and recreation corridors. Their cultural significance to Aboriginal communities should also be recognised as part of their preservation and enhancement.

Gawler Greenway

The planning for this Greenway has already been undertaken and the section between the Elizabeth CBD train station and Elizabeth South train station is partly implemented, with the remaining portion to be constructed this financial year. However, funding for the rest of the Greenway is required. The Greenway will provide a key corridor for walking and cycling and

connection to public transport nodes. A high concentration of public housing and households without access to a private vehicle are located in the suburbs abutting the rail line, making the development of the Greenway a high priority.

5.3 Tree Canopy

Proposal for the GARP

- That the GARP identifies Playford's tree canopy target as achieving a 20% increase in urban canopy cover by 2045 within existing build-up areas.
- That the GARP includes an action to review the Planning legislation and Planning and Development Code to look for opportunities to retain tree canopy and offset canopy loss.

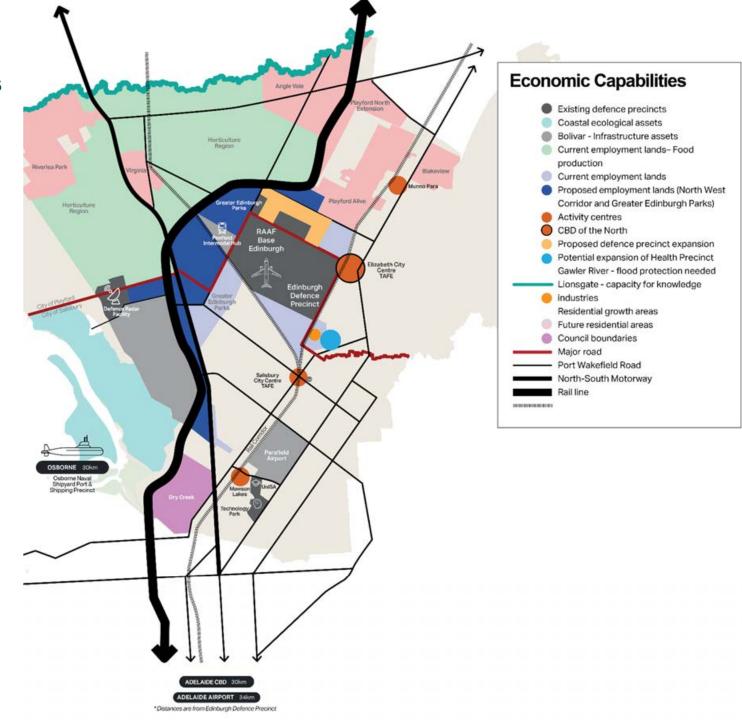
The Discussion Paper acknowledges that different urban contexts and social vulnerability indicators should input into prioritising areas for increased canopy cover (p.165), which is supported.

The City of Playford's <u>Urban Tree Strategy (2021)</u> identifies an increase in canopy cover from 15% to 20% by 2045 within existing built-up areas. To achieve this target, Council is currently working towards the planting of 65,000 trees over the next 25 years.

Urban development in Playford's growth areas generally results in an increase of tree planting as most of the subject land has been cleared for agricultural/horticultural purposes in the past. However, the Urban Tree Canopy Overlay in the Planning and Development Code does not apply to these growth areas, meaning the planting of street trees by developers is by negotiation only.

Moreover, the planning system in general does not adequately support the retention and increase of tree canopy. There needs to be a stronger planning framework to support the retention of trees that are not regulated as well as exploring offset requirements that are reflective of the actual value of the trees.

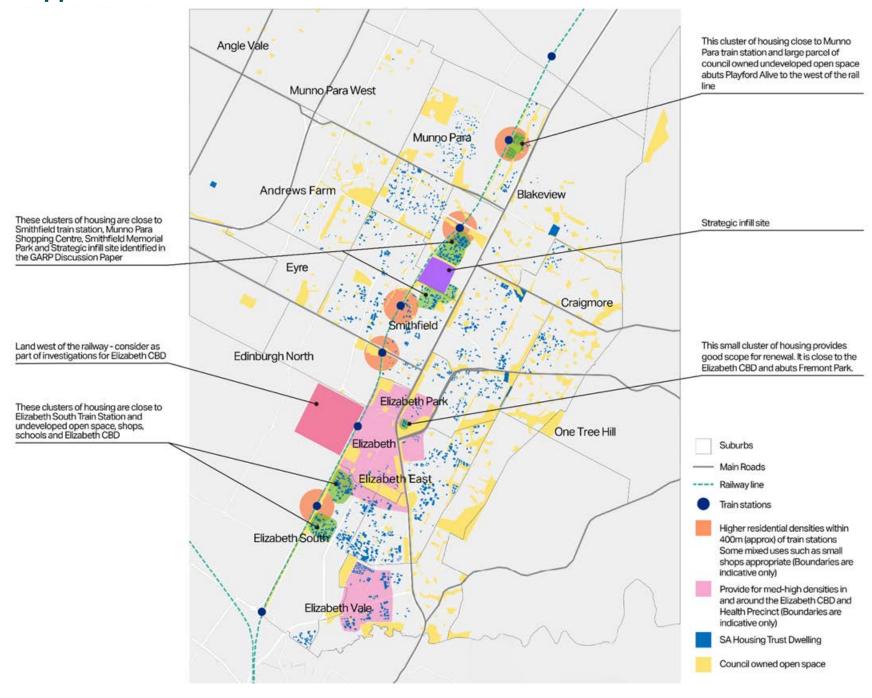
Appendix A Economic Capabilities



Appendix B: Transport Upgrades



Appendix C: Residential Densities and Renewal



End Note:

¹ Data provided by Elizabeth City Centre is based on CBA transactional data sourced from Commbank Centre iQ

Disclaimer: Centre iQ has been prepared as a data analytics tool for general informational purposes only.

This tool comprises, and is the subject of intellectual property (including copyright) and confidentiality rights of one or multiple owners, including CommBank iQ, Commonwealth Bank (ABN 48 123 123 124) (CBA), or the Quantium Group Pty Limited (Quantium), together IP Owners. Reliance should not be placed on the information provided to make business decisions as the information may be incomplete or not up to date and may contain errors and omissions. Any insights made are based on models and data analysis, and do not reflect the views, opinions or any recommendations of the IP Owners. Centre iQ insights are not, and must not be construed as advice, research or a recommendation in relation to securities or other financial products or services.

Any views, opinions or insights are subject to change without notice and the IP Owners are under no obligation to keep current, in real time, the information contained in Centre iQ.

Liability Disclaimer

To the maximum extent permitted by law, the IP Owners expressly disclaim, take no responsibility for and have no liability for the preparation, contents, accuracy or completeness of this report, nor the analysis on which it is based. This report (or any extract thereof) is provided in confidence, may only be used for the purpose provided, and may not be copied, reproduced, distributed, disclosed or otherwise made available to a third party.

Privacy and data security

CBA takes its responsibility to protect the privacy of its clients very seriously and applies strict security and privacy controls to the way it handles information. No raw data or individual customer data is accessible from Centre iQ. All customer data is handled in accordance with the CBA's Privacy Policy.

Conflicts of Interest

CBA may have business relationships with brands included within the insights provided by Centre iQ. All brand insights are driven by data analytics and do not reflect the views of CBA. For further information on how CBA manages its conflicts of interest please refer the CBA's Conflicts of Interest Policy.

Complaints

If you have a complaint, the CBA's dispute resolution process can be accessed in Australia on 13 22 21 or internationally on +61 2 9841 7000.



DTI:PlanSA Submissions

From: Tony Kamenjarin <

Sent: Wednesday, 15 November 2023 11:51 AM

To: DTI:PlanSA Submissions

Cc: maggie.hine; Michael Kobas; Steve Hooper; Ballard, Matthew (DTI)

Subject: Greater Adelaide Regional Plan Discussion Paper - City of PAE official submission

Attachments: PAE Submission_ENDORSED by Council 14 Nov 2023 .pdf

You don't often get email from

. Learn why this is important

Attention: Growth Management Team, Planning and Land Use Services

Please find attached a copy of the City of Port Adelaide Enfield's official submission in response to the Greater Adelaide Regional Plan Discussion Paper. This submission was endorsed by Council at its meeting held on 14 November 2023.

Regards

Tony Kamenjarin

Strategic Urban Planner

163 St Vincent Street Port Adelaide SA 5015 PO Box 110 Port Adelaide SA 5015

T: E:

(Work days: Mon, Tue & Wed)

www.cityofpae.sa.gov.au











@CityofPAE

Disclaimer This e-mail is from the City of Port Adelaide Enfield. The contents are intended only for the named recipient of this e-mail and may be confidential.

If the reader of this e-mail is not the intended recipient you are hereby notified that any use reproduction disclosure or distribution of the information contained in the e-mail is prohibited.

If you have received this e-mail in error please reply to us immediately and delete the document.

The City of Port Adelaide Enfield advises that in order to comply with its obligations under the State Records Act 1997 and the Freedom of Information Act 1991 email messages are monitored and may be accessed by Council staff and (in limited circumstances) third parties.

Any loss/damage incurred by using this material is not the sender's responsibility. The City of Port Adelaide Enfield's entire liability will be limited to re-supplying the material.

No warranty is made that this material is free from computer virus or other defect.



Greater Adelaide Regional Plan Discussion Paper

City of Port Adelaide Enfield Submission

The City of Port Adelaide Enfield welcomes the opportunity to provide comment on the issues raised in the Greater Adelaide Regional Plan (GARP) Discussion Paper.

Council's submission is structured as follows, with specific recommendations included under each relevant section:

Major initiatives in PAE

This section identifies key strategic initiatives that Council considers needs to be included in the final GARP (Greater Adelaide Regional Plan)

Key issues requiring further detailed investigation

This section identifies key regional issues that Council considers needs more focus and/or further investigation to inform the priorities for inclusion in the GARP

PAE specific issues

This section identifies key spatial planning issues specific to the City of Port Adelaide Enfield that Council considers needs to be included in the spatial plans in the GARP.

Responses to discussion paper questions

This section provides responses to the relevant questions posed in the discussion paper and that are not addressed in the content contained in the above sections.

1. Major initiatives in PAE

1.1. Strategic master plan for the Lefevre Peninsula

A comprehensive state-led investigation into and master planning for the future of the Lefevre Peninsula is needed.

The case for such a study is clear and has been consistently advocated for by Council. It has also been supported by the Parliament of South Australia. Its 2013 "Report of the Select Committee on Land Uses on Lefevre Peninsula" made 15 recommendations to Government including "That the Government undertake a comprehensive review of all land uses and land zoning on Lefevre Peninsula and prepare a strategy to address historic land use decisions that result in conflict between industry and other uses. The review should identify options for moving the location of either industry or housing if conflicts cannot be resolved in any other way."

The need for a state-led strategic study of the Lefevre Peninsula is ever more pressing due to the AUKUS project, the growth of associated and nearby industry and the



general promotion of urban infill development in suitable areas including the expected future development of the Dry Creek 10,000 dwelling site nearby.

The scope of the investigations needs to include analysis of: existing and potential Major Hazard Facilities; cumulative hazard impact from EPA licensed activities; the future of petrochemical storage; freight volumes; consideration of the impacts of climate change and coastal processes; appraisal of the strategic value of deep water port infrastructure on the western side of the Port Adelaide River between Diver Derrick Bridge and the Defence Hub; and impacts on residential development and potential density increases.

Recommendation 1

That GARP includes the Lefevre Peninsula as an area of strategic importance and a commitment for the State Government to take the lead in preparing a strategic master plan for the Lefevre Peninsula in collaboration with key stakeholders, including the City of Port Adelaide Enfield.

1.2. Planning for a new road freight route for the Lefevre Peninsula

Planning for a potential new road freight route to access the northern parts of the Lefevre Peninsula needs to be undertaken due to the following factors:

- the expected growth of the Defence Industry on the peninsula due to AUKUS;
- the growth of freight reliant industry in the adjacent inner north and outer north regions;
- the growing pressures on Victoria Road in terms of traffic volumes and resultant population and environmental health impacts in the local area;
- the existing and future impacts of industry and road freight on the Lefevre Peninsula residential community; and
- the significant existing legacy issues between industrial and residential land uses.

The City of Salisbury is experiencing a significant increase in demand for large industrial / employment sites located close to freight networks with proximity to port infrastructure (which is sited in Port Adelaide Enfield). It is seeking to accommodate this demand through protecting existing industrial zones and rezoning additional land for industry. This will further increase the freight task and load on the Port River Expressway and exacerbate road freight impacts on existing and future residential communities, including the soon to be constructed northern side of the Dock One residential development directly abutting the Diver Derrick Bridge.

There is a need to investigate and set aside land for a future new road route to the Outer Harbour Port facilities, future AUKUS site and Defence Hub that is more direct and efficient for industry and its workers, and avoid further worsening traffic management on Victoria Road and further exacerbating the interface issues between industry, freight and residential development on the Peninsula. The investigations should also consider the opportunity to provide a rail service to this future major employment hub to provide an efficient public transport option for employees. This



should include consideration of a direct service from Port Adelaide or a spur line extension from an existing station.

A recent (2023) economic analysis commissioned by PAE reported that "The contrast between occupations and industries of employed residents and local workers means there are huge inflows and outflows of commuters daily, up to 100k (50k in, 50k out). If this continues to grow, potential congestion may start to impact the transport and logistics industry." Port Adelaide Economic Health Check, May 2023 i.d Economics

Recommendation 2

The GARP should investigate:

- A new road freight route, including a new bridge crossing north along the Port Adelaide River and the reservation of land or a corridor for this route. The findings should be incorporated into the GARP; and
- The provision of a rail service for employees at the Osborne Naval Shipyard.

1.3. Port Centre as a case study for coastal resilience

Council supports a review of the Port Adelaide Urban Activity Centre to further consider its potential for urban regeneration.

Whilst the area is currently already undergoing significant development around the waterfront areas, the centre is large and multi-faceted, and there are opportunities to explore the potential for new development and adaptive reuse in discrete parts of the centre. For example, potential opportunities may be created in the historic Woolstores area as a consequence of the development of the new Port Adelaide rail spur and train station.

Critical to such a review are key studies into sea level rise impacts affecting the Lefevre Peninsula in general and the Port Centre more specifically, and the practical delivery of the necessary adaptation measures. These studies are reflective of collaboration between the three tiers of government, being led through the Department for Environment and Water (DEW), the Coast Protection Board, and the Commonwealth, respectively.

Recommendation 3

A review of the Port Adelaide Urban Activity Centre (as proposed in the discussion paper) needs to be progressed.

2. Key issues requiring further detailed investigation

2.1. Climate change, hazard mapping and growth

While the GARP looks ahead 30 years, it needs to consider climate conditions much further into the future than this, as the effects of decisions based on the GARP will be realised into the next century.



The GARP Discussion Paper identifies the need to ensure that growth is not directed to areas where there are hazards that cannot be reasonably mitigated. The understanding of climate related hazard already includes bushfire and terrestrial flooding but also needs to include other expected climate related hazards including urban heat, greater severity of storm events and overall reduced rainfall. Current information about South Australia's future climate (published by DEW in 2022) advises that by 2090, Adelaide could experience 121% more extreme rainfall days, 79% more days of extreme heat (35+°C), 64% more severe fire danger days, and 61cm of sea level rise. These are significant changes.

With the GARP's key role being to determine where Adelaide should grow, it is critical to use up-to-date available data on where these effects will most be felt – for example, by using spatial models of coastal and riverine inundation, urban heat and greening, and bushfire risk – to inform subsequent decisions about the location and sequencing of rezoning, infrastructure provision, land release and development. The aim should be to minimise the vulnerability of future generations, and the liabilities of current and future governments.

As climate related hazards and the threats they pose are dynamic, the GARP will need to be informed by regular updated hazard modelling e.g. every 5 years to allow sound planning decisions to be made. An across government process will need to ensure that the Commission can keep the GARP aligned with the most up-to-date climate science.

Of particular relevance to PAE and other coastal councils, the GARP will need to consider and address the impact of rising sea levels and more intense storm events that create coastal flooding and coastal erosion. PAE is currently working with the Department for Environment and Water on a coastal flooding project to update the understanding of this threat and its impacts (including spatial) upon our City as well as state government land at Garden Island. The Commission will need to avail itself of this information (and other similar hazard update studies affecting the Greater Adelaide Region) and ensure that the content and directions of the GARP and the subsequent decisions based on this are appropriately updated.

Recommendation 4

The GARP needs to be kept informed by up-to-date climate science information, including regular updated hazard modelling.

2.2. Integrated transport planning

The GARP needs to be informed by comprehensive, integrated transport planning that is intrinsically linked to planning for growth. This is a key component of the Living Locally concept. While mentioned in the Discussion Paper, it needs to be significantly advanced as a critical component in the preparation of the actual GARP.

In general infill areas, increasing densities increase local traffic volumes and local traffic management concerns.

In master planned neighbourhood areas and strategic infill sites, while the traffic volumes and flows within the boundaries of these places are generally well considered



and dealt with at the development application stage, the impact of this form of development on the traffic network of surrounding areas can be significant and create capacity problems on surrounding roads, including main roads. Careful network planning is required to underpin the zoning and development of such sites.

In Urban Corridor Zones, PAE's observations of neighbouring council areas with these zones is that the increased density of development increases demand on local traffic networks, notwithstanding their proximity to public transport. Taking a long-term view that progressive development in these corridors will eventually fill in and deliver the desired outcomes of Urban Corridor Zones, they need to be planned so that there is capacity to provide suitable public transport in 20- or 30- or more years' time. Effective future proofing will require early analysis of road capacity (including road reserve width and physical infrastructure constraints) against different public transport options and active transport requirements. Such analysis needs to be treated as fundamental to informing decisions about rezoning further land for urban corridor development. The aim should be to ensure that attractive and convenient public (and active) transport can be provided, and to avoid intractable traffic congestion in the future.

While not in PAE, the effects of urban growth based on the northern and north-eastern road spines of Greater Adelaide will nevertheless impact PAE residents and businesses. As with urban corridor growth, future proofing is required to allow potential future public transport to be provided. If the transport difficulties associated with the growth of Mt Barker and the development of South Rd are to be avoided in new areas in the future, corridors for future public transport will need to be identified and reserved.

The GARP also needs to be informed by comprehensive, integrated transport planning that is intrinsically linked to planning for employment and industrial growth. In this regard an opportunity exists to assess demand for public transport connectivity between activity centres in PAE and adjoining Councils for improved east-west public transport connectivity (e.g. between the Port Centre and Tea Tree Plaza).

The growth of industry and employment land in PAE, and the inner north region more generally, needs to be underpinned by comprehensive transport analyses that address not only freight and industry movement needs but the employment needs of the workforce serving those industries, and the externalities of that traffic on other surrounding other land uses.

The growth of industry on Lefevre Peninsula, Gillman, Wingfield, and the industrial areas in PAE's northern Council neighbours is a case in point. This growth is expected to be substantial and will generate significant additional freight impacts on residential areas, particularly along the Lefevre Peninsula. The case for a new road freight route to serve the Lefevre Peninsula is specifically addressed earlier in this submission.

As a final transport-based comment, the desire to promote active travel modes is supported, but by the same token, the reality of car dependence (in a place such as Greater Adelaide) should be acknowledged and not ignored. While programs such as ride sharing and Go Zones have existed for some time, their success in reducing car dependence has been mixed. This suggests that the GARP may have some work to do in this regard; the development of strategies for last-mile solutions, e.g., public



transport on-demand/feeder service, micro-mobility (e-scooters), and car/rideshare to improve public transport uptake could help to address this challenge.

Recommendation 5

The GARP needs to be informed by comprehensive, integrated transport planning that is intrinsically linked to planning for growth, including:

- The identification and reservation of public transport corridors to service future public transport needs; and
- assessing demand for public transport connectivity between activity centres in the City of Port Adelaide Enfield and adjoining councils for improved east-west public transport connectivity (e.g. between the Port Centre and Tea Tree Plaza).

2.3. Open space

The provision of public open space and the need for our streets and roads to contribute to the amenity and sustainability of our urban area has not kept up with growth and increasing densities. Plans for the future growth of the Greater Adelaide Region need to accept and provide for the greater importance of public open space, and streetscapes.

In accord with previous regional planning strategies, Greater Adelaide's urban footprint has expanded, and the density of development has increased – but open space, vegetation, and tree coverage on private land have decreased, despite the increased awareness and promotion of increased tree canopy cover.

With further expansion of the urban footprint and the continuing densification of residential development, the public realm (especially public open space and streets) will become ever more important in providing green space, tree canopy and helping to mitigate climate change impacts, particularly urban heat.

Unlike in previous decades, existing public open space is increasingly needed to help manage stormwater (given the greater runoff generated by increased residential densities), while also needing to cater for the increased and varied demands of sporting clubs. This impacts the availability, use and design of that public open space, including the balance of hard to soft surfaces, the ability to plant trees, and to meet canopy targets.

With the above in mind, the legislated public open space contribution of 12.5% needs to be reviewed. It is noted that this contribution rate was set at a time when the majority of housing was characterised by detached dwellings with smaller floor areas, deeper building setbacks, and larger yard sizes.

In the earlier SA planning system, Council-based Development Plans contained a hierarchy of open space and provided guidance on the amount and location of public open space based on the type of open space (ranging from regional to local). The Commission may wish to reconsider the use of such a system and / or the notion of setting public open space requirements based on the planned densities of localities.



A strategic approach to the provision of public open space is consistent with the discussion paper's proposal to reintroduce the Metropolitan Open Space System, which Council supports and commends.

Aside from meeting movement needs, streets are the other critical major public realm element that contribute to place and amenity. They are increasingly seen as a way to provide greater tree canopy to compensate for the loss of canopy on privately owned land. At the same time, they have been progressively reduced in width as part of the densification of development and the design approaches of developers. While reducing the width of carriageways (from kerb to kerb) is a well-accepted way of managing traffic speeds and volumes, the typical approach of automatically reducing the overall road reserve width (rather than just the carriageway) significantly limits opportunities for landscaping, tree planting and general amenity. It also leaves little opportunity to redesign streets in the future to cater for changing needs, including responses to climate impacts and future land use and transport challenges.

Recommendation 6

The GARP needs to:

- support a review of the legislated open space contribution and how money in the Open Space Fund is allocated;
- promote the development of road reserves that can practically support tree planting, increased canopy cover and future proofing; and
- reconsider the reintroduction of an open space hierarchy that provides guidance on the amount and location of public open space based on the type of open space (i.e. local to regional).

2.4. Sustainable growth

Actual and projected population growth needs to be regularly monitored to ensure that the GARP remains up to date and is adjusted as required. Generally speaking, population projections are structured according to low, medium, and high growth scenarios. While there are arguments for adopting any of these approaches, any intent to adopt a high growth scenario (in the Greater Adelaide Regional Plan) may result in distortions to planning processes, particularly for funding and infrastructure allocations that may not match development patterns on the ground. Although an overprovisioning of infrastructure in one location may allow for long-term growth, it may (indirectly) contribute to under-provisioning in other locations.

More broadly, consideration also needs to be given to the notion of whether a high-growth mentality accurately reflects the position of local communities and Councils. On the face of it, the discussion paper presupposes that high growth is appropriate, without explicitly concluding if moderate or low growth approaches are better outcomes.

Anecdotally, some in the community perceive the current-day planning system as fostering "growth at all costs". To its credit, the discussion paper intends for a more nuanced approach to growth, but the challenge remains if local communities view growth from a regional (as opposed to neighbourhood or local) perspective.



Recommendation 7

The GARP needs to:

- Regularly monitor population growth rates,
- Plan for a medium-growth scenario (because historically this is more likely to eventuate)

2.5. Infrastructure capacity

Growth and further densification need to be consistent with infrastructure capacity and underpinned by comprehensive infrastructure analyses that address both physical and social infrastructure.

From a physical perspective, a prominent example – experienced across Greater Adelaide – relates to stormwater infrastructure.

While there is a composite of statutory, strategic, and engineering-based components to this issue, the aforementioned influences of densification and climate change present ongoing challenges to local governments in this regard. Ideally, the GARP will demonstrate a clear grasp of these challenges and a strategic planning approach that facilitates effective solutions.

A similar comment applies to social infrastructure such as schools. In recent decades, there has been a sustained trend towards schools with larger student numbers on the one site or campus. While the approaches of school capacity management may differ between public and private schools, it would seem appropriate for state agencies to anticipate such growth and manage it well in advance of large-scale land releases. Such an approach can help deliver upon the discussion paper's goal of living locally, for example.

Recommendation 8

The GARP needs to plan for physical and social infrastructure ahead of future growth in designated growth areas

2.6. Industrial hazard

Aside from climate-related hazards the GARP should recognise and respect the impacts of industry-related hazards. These include Major Hazard Facilities (MHFs) as well as accumulated hazards. The latter refers to a concentration of licensed activities in a relatively small area, albeit with each of the individual activities falling below threshold levels for declaration as MHFs. A preponderance of accumulated hazards may not be common throughout all parts of Greater Adelaide, though the Lefevre Peninsula is one prominent exception. Also, the outer fringes of industrial precincts such as Wingfield may be in proximity to residential areas that could otherwise be appropriate for residential regeneration, were it not for industrial/residential land use conflicts. While major industries may be regulated as activities of environmental significance by the Environment Protection Authority, there may also be benefit in strategically guiding the location of industrial uses whose scale does not trigger the relevant statutory thresholds.



These overall issues should also be considered in conjunction with the conversion of former industrial land to residential uses in recent times. While such conversions are one way of effectively removing industrial uses (and therefore hazards) from a given locality, the gradual erosion of industrial land supply in well-serviced areas raises a broader strategic question of whether the GARP will take a firm (or flexible) role on this matter. This strategic importance of this matter (from a state perspective) has tended to ebb and flow over time, suggesting that strategic guidance will be necessary.

Recommendation 9

The GARP needs to recognise and plan for the impacts of industry-related hazards. These include Major Hazard Facilities (MHFs) as well as accumulated hazards.

2.7. Affordable housing

Like almost all areas in Australia, PAE is currently experiencing growing pressure in its local housing market, with increasing housing costs and reduced availability, particularly of affordable purchase and rental options, as well as lengthy and growing waiting lists for social housing.

This situation has been brought about by a wide range of long-term and more recent factors (often beyond the control of local government) that together have created greater demands on current housing stock and had a significant negative impact on housing affordability and availability. It has placed the City of Port Adelaide Enfield and its residents in an increasingly vulnerable housing position.

As the GARP is developed and implemented, its role in contributing to the affordable and social housing aspirations of Government housing strategies such as "Our Housing Future 2020 – 2030" needs to be more fully developed and documented.

With respect to land supply, some in the media have tended to frame land availability (and/or delays in the development assessment process) as the principal influence upon housing affordability. In contrast, comparatively less media attention has been given to other key influences such as migration rates, taxation laws for rental properties, household formation rates, the economics of the residential construction industry, as well as statutory government charges (e.g., stamp duty). While these are outside the control of the planning system, it is important for the GARP to avoid unintentionally contributing to any perception that affordability is tied principally to the matter of land supply.

Recommendation 10

The GARP needs to be developed to help deliver the affordable and social housing aspirations of Government housing strategies such as "Our Housing Future 2020 – 2030"

2.8. Relationship of regional planning with the *Planning and Design Code*

In some cases, aspects of Council's submission have necessarily touched on policy matters that belong in the *Planning and Design Code* (as opposed to a regional plan).



While the discussion paper makes a good many points that are supported in principle, some of them would appear to require direct follow-through into the Code (i.e. a Code Amendment) for full effect. The mechanism for ensuring this follow-through is unclear, which could result in lost opportunities for delivering on the plan's targets. To provide greater certainty to stakeholders, it is suggested that the draft GARP document includes consideration of this matter, notwithstanding the exemption in Section 72(2) of the *Planning, Development and Infrastructure Act 2016*.

Recommendation 11

The GARP needs to indicate a program of initiatives that will be delivered through the Code Amendment process

2.9 Social infrastructure planning and provision

In general, it appears that the discussion paper has not spoken more concretely to social infrastructure components as a core component of integration of community /land use planning (which then translates into a spatial planning document at state level).

As recently as the early 2000s, regional plans in South Australia typically referred to the State Government's *Human Services Planning Kit*. This document informed all social infrastructure planning in new land releases. This document demonstrated how social infrastructure planning and provision was embedded into early infrastructure planning, and it was deemed as equally important as stormwater networks and roads in terms of land supply requirements. The kit provided clear guidelines about space allocation requirements, timeframes, and integration into spatial planning approaches. It is noted that the kit was discontinued by the State Government some time ago, and in present times, there has been a lack of successor document for use by governments and developers.

Although the discussion paper makes seven references to the term 'social infrastructure', Council considers that these references should be developed into a more robust discussion of the matter. This would complement the paper's (more frequent) references to physical infrastructure, thereby showing a firmer grasp of infrastructure considerations in a high-level, long-term document.

Recommendation 12

The GARP needs to allude to the need for early and consistent recognition of the necessity of identifying land use planning and space requirements for community infrastructure (such as schools, regional libraries, community hubs, and regional sporting facilities).

3. PAE specific spatial issues

Further to the issues discussed earlier in this submission, there are several spatial matters that Council wishes to draw to the Commission's attention. Some of these



matters are identified on maps and figures within the discussion paper, but others are drawn on Council's current experiences with the planning system.

For ease of reference, the cited locations are shown on the attached A3 map:

Sites 1-6 – (these pertain to the Lefevre Peninsula and are addressed earlier in this submission)

Site 7 - Cowan Street Strategic Infill site

This site is owned by the City of Port Adelaide Enfield. Council understands its development opportunities and constraints and is keen to ensure a good outcome on this site. It is continuing to investigate options and approaches to its development.

As it is only a small site, is the subject of recent and ongoing investigations, and already offers infill development opportunities under the Housing Diversity Neighbourhood Zone, Council considers that its identification in the GARP as a strategic infill site is unnecessary.

Site 8 - Woodville Gardens regeneration area

This area is currently being incrementally redeveloped and may provide only limited opportunity for future additional growth over the next 30 years. Its identification as a regeneration area is questioned and needs more careful consideration. This would require further investigations regarding development coordination, master planning and site amalgamation. In this scenario, Council is prepared to review this further in collaboration with the Commission and PLUS as work on the actual GARP is progressed.

Sites 9 and 10 – Croydon Park and Regency Park Master Planned Neighbourhood Zones

Each of these sites are supported as identified growth areas, noting that their current zoning already encourages higher densities.

Sites 11, 12 and 13 – Corridor Investigation: Churchill Road, Prospect Road and Main North Road

Council is open to Churchill Road and Main North Road being investigated for Urban Corridor zoning, similar to what exists in the City of Prospect. (*In the case of Main North Road, it is noted that the CavPower site, for example, is now on the market although its current zoning supports industrial/commercial redevelopment, rather than residential development.)

Prospect Road, however, has a different character to the other two roads. Churchill and Main North Roads serve more of road-based functions, whereas Prospect Road has less traffic (one lane each way). In addition, Council has invested heavily in creating a pedestrian friendly, village atmosphere consistent with what has already occurred in Prospect Council. PAE's support for investigating Urban Corridor zoning along Prospect Rd is therefore more qualified and will require further deliberation and generally a more cautious and nuanced approach.



As an overarching principle, Urban Corridor rezoning within PAE, and the metropolitan area more broadly, needs to be carefully staged and sequenced to ensure that development is agglomerated rather than randomly dispersed and piecemeal. The aim should be to create tighter new character areas that realise the opportunities that can be provided by this type of development (e.g. supporting improved public transport and providing sufficient density to support ground level shops and cafes - while minimising the impact on surrounding areas with traditional low density character, by reducing the amount of interface and requiring high quality design.

Council strongly supports the Commission's intent to closely study the issues associated with the release and subsequent development of the initial tranche of Urban Corridor rezonings, and structure a rezoning program and revised Planning and Design Code policy based on those learnings.

Site 14 - Urban Renewal Neighbourhood Zone

As noted in its current Code Amendment work program and raised in its submission at the time of the Ministerial rezoning and subsequent planning system submissions, Council intends to pursue a Code Amendment to rezone the southern portion of this area to a more appropriate zone. A reduced density is considered justified given Council's openness to investigating the up zoning of other locations in the Council area to higher densities.

Site 15 - Mixed Use Transition Zone

The existing desired policy outcome for transition from industrial to residential has not (as of yet) materialised, and, in fact, some industrial uses are investing in their existing sites rather than relocating elsewhere. Notwithstanding this, Council is open to residential regeneration in this area over the long term, particularly if purpose-built industrial precincts (such as Gillman) become available for relocation.

Site 16 – Mass Rapid Transit Investigation Area: Hampstead Road and Environs

The GARP's intent for this investigation needs further discussion and clarification. The definition of the eastern boundary also seems arbitrary, and Council is seeking clarification on this boundary and whether it will be adjusted further.

Council is open to state-led investigations in this area and assumes that it will be focussed on the provision of improved bus services, Go Zones, or the like. It is also assumed that that traffic capacities (especially during peak times) will be considered.

Site 17 – Enfield Character Area Overlay

While forming an Established Neighbourhood Zone, Council has observed a steady replacement of established buildings in this zone over recent years. If investigations were pursued at a future time, the character of the remaining buildings (many on larger blocks) should be noted.

Site 18 – North-western Lightsview (Master Planned Neighbourhood Zone)

In the event of future redevelopment of the area identified as a strategic infill site, lessons learnt from some of the problematic aspects of the Lightsview development,



such as the ratio of residential carparks to bedrooms, should be used to ensure better outcomes when this site is redeveloped.

Site 19 - Grand Junction Rd Master Planned Neighbourhood Zone

Council took great care in crafting tailored policies for this zone, but many of them were altered or deleted by the Planning & Design Code in 2021. As the zone has not yet been developed for its envisaged residential growth, it important for the GARP to recognise the site constraints and (residential design) wishes of local communities in this area.

Site 20 - Oakden & Gilles Plains Master Planned Neighbourhood Zone

Oakden Rise presents the largest greenfield development opportunity in PAE over the next 15 years. Council is participating in the development of this area, which is now underway. It is expected that the development will take cues from the nearby development of Lightsview. In saying this, some Lightsview residents have expressed complaints about carparking provision, residential overlooking, and waste collection difficulties. This suggests a need for the GARP (as well as the Code) to actively monitor and respond to contemporary residential development approaches.

In addition, Council considers that the State Government should more carefully consider the provision of social infrastructure and services (e.g. schools) for such a large development.

Site 21 – Corridor Investigation – North East Road

The discussion paper has relatively little detail on the investigations that are proposed for this road. From a traffic perspective, it is noted that North East Road is already experiencing capacity challenges, particularly during peak periods. In addition, other nearby main roads (such as Sudholz Road, O.G. Road, and Fosters Road) are also experiencing capacity issues of their own.

An intention for residential growth along this corridor could be expected to exacerbate existing traffic challenges. Council's ability to influence road design improvements to North East Road is also limited, given the State Government's control of the arterial road network.

From a zoning perspective, the Council Assessment Panel has noted some mismatches in zoning at Hampstead Gardens, where existing commercial development is zoned as General Neighbourhood Zone.

4. Discussion Paper questions

For the questions appearing throughout the discussion paper, the following responses are provided, noting that parts have been referenced elsewhere in this submission.

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



Each of the four outcomes are supported in principle. In practice however, trade-offs may be needed if two given outcomes are in conflict with one another. For example, greater housing choice is likely to facilitate higher residential densities, which could make greening and wilding more difficult to achieve. This matter is elaborated upon elsewhere in this submission and appendices.

Question: 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 twin trends of increased lone person households and an ageing population have been noted in the discussion paper. Put together, both trends suggest a greater need for aged care facilities or ageing-in-place programs over the GARP's 30-year lifespan. Putting the concept of living locally into practice, new aged care facilities tend to require larger tracts of land, which may not be readily available – especially in established urban areas. A land use plan may therefore assist in identifying and reserving such land in advance of future requirements.

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

One possibility is to adopt a threshold-based approach that spatially defines and quantifies locations within Greater Adelaide in the context of climate resilience. For example, AdaptWest has noted indicators such as:

- o Community events that are cancelled on account of extreme weather
- Insurance premiums in a given location to a point where they are unaffordable – this suggests that a location is not sufficiently climate resilient
- Frequency of home floor level inundation a deemed number of instances per year (or every five years).

There is also benefit in identifying large areas of existing green space e.g. golf courses and cemeteries as a component of the Metropolitan Open Space System. In addition, the ecological value of existing mangrove forests in the Cities of PAE and Salisbury could also be recognised, given that the term 'mangrove' does not appear once in the discussion paper.

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

Convenient, frequent and efficient public transport is fundamental to ensuring easy access to recreation, cultural and service facilities for people of all ages and all levels of mobility. As alluded to earlier in this submission, the Greater Adelaide Regional Plan needs to be developed in parallel with a comprehensive transport planning study to ensure that growth is accompanied by improved public transport, or at the very least that opportunities to provide improved public transport in the future are not designed out.

The Plan could map the locations of community facilities (such as public open space) which are not accessible within reasonable walking distance. This could



serve as a basis for disadvantaged areas that would be priority locations for new community facilities A similar map-based approach could be undertaken for places that are lacking in facilities such as schools, libraries, doctor's offices, post offices, veterinary clinics and the like. This could serve as evidence for action over the long term such as rezoning to accommodate community land uses

At a more conceptual level, social equity in the community would appear to be continually and steadily challenged by the gentrification of selected areas throughout Greater Adelaide. It may be difficult for a regional plan to directly resolve this, however.

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

With regard to manufacturing, the discussion paper's references to advanced manufacturing and traditional manufacturing are noted. While the former can contribute to a smarter, cleaner, and regenerative future, the latter is widespread in Port Adelaide Enfield, and likely to remain for the foreseeable future. As such, it is important to ensure that interface matters are appropriately incorporated to protect such businesses, noting that some may operate on a 24-hour basis.

Aside from manufacturing, it is noted that non-industrial uses (e.g. commercial uses) also play a notable role in the local economy. In tying this to the Port Centre (for example) it is important to have a setting that encourages foot traffic and a sense of street vibrancy.

In terms of cleaner futures, the GARP could help to facilitate increased investment by State and Federal Governments (and private sector) in the transition to lower emissions and quieter freight vehicles.

There may also be scope for integrating other exercises/approaches such as 'economic health checks' into the GARP. It is also understood that periodic 'report cards' on the planning system are issued by the Planning Institute of Australia, which may also touch on similar matters.

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

Strategic infill sites that are large enough to create their own character provide a key opportunity to establish varied and new types of housing. If these areas are master planned, a variety of housing types can be carefully designed to coexist with each other in new well-designed neighbourhoods. The Greater Adelaide Regional Plan should fully explore the opportunities to identify additional strategic infill sites, including sites in established areas where coordinated development schemes and acquisitions may be able to resolve the difficulties typically associated with fragmented land ownership.



The role of public housing provision needs to be carefully reconsidered and arguably while not in the strict remit of the GARP, it should acknowledge and reaffirm the critical role that public housing has in providing equity and social cohesion.

Notwithstanding the above, it is appreciated that uncertainties with delivery of housing choice go beyond the realm of urban planning, and branch into matters such as federal government policy (e.g. migration and negative gearing), the economics of the construction industry, and cultural norms and consumer preferences.

Question: What neighbourhood features enhance living and working locally?

The discussion paper discusses the term "living locally" but does not attempt to quantify it. While the paper uses expressions such as "locating [facilities] closer together" and "a comfortable [journey] from home" these things mean different things to different people. Without a numerical definition, it would seem difficult to evaluate the achievement of this goal as time goes on. In this context, PAE's Integrated Transport Strategy seeks that new residential zones are within a 5-minute (or 400-metre) walking catchment of the public transport network.

Definitions aside, walkability would seem to be a key element. This could be evaluated against the proximity of nearby open space, retail and cultural facilities and employment opportunities, the provision of footpaths (on both sides of a given street), pram ramps, public lighting, park benches, street trees, perceptions of pedestrian safety, perceptions of crime, and the flatness of land to name a few.

Similar comments could also be made about cycling. The infrastructure required to support cycling differs from that of walking, and potentially warrants more of regional-based perspective compared to walking. On top of this, there are certain perceptions of cycling that are centred around notions of safety. As part of this, there has been somewhat of a shift towards off-road trails, but this seems physically difficult to retrofit in some locations, where the only physical option is for cyclists to share the road with motorists. The plan should consider this issue.

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

See previous question. In addition, one practical challenge with greenfield development is the willingness of small businesses (for example) to establish themselves at the earliest stages of a greenfield development, where few houses have been constructed and there is a small local population. This scenario presents a relatively high level of economic viability risks to new businesses. While to some extent this is a 'chicken-and-egg' problem, it can be mitigated by master planning that includes the designation of centres that help to provide investment certainty.



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

The clear benefit of greenfield development is that it represents one of the most effective ways to achieve the population growth targets of the Greater Adelaide Regional Plan – often in locations that are relatively close to existing services. One potential drawback is its effect on wider/regional infrastructure networks (e.g. stormwater catchments and main roads) – particularly if the network was originally designed with lower densities in mind. Such effects are not always immediately apparent. While regional plans may be conscious of this, their effectiveness can be limited given such plans are not legally enforceable in most cases.

Another major potential drawback of greenfield development is the typical reliance on car travel to access employment and education leading to lengthy commutes and profound, long-term traffic congestion. To mitigate this, the commitment to 'living locally' needs to be genuinely realised and a comprehensive growth aligned transport study needs to be undertaken to inform the GARP.

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

Council notes the discussion paper's discussion on the Living Locally concept, including its reference to 'a greater choice of housing in the *right* places' (p. 84, emphasis added). This sentiment is supported, noting that some infill development has been undertaken in an uncoordinated fashion by private landowners that act independently of one other.

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

Infill development allows more people to live within an established area, which is particularly useful for those that have already established social ties within a local area. It also makes more effective use of multimillion-dollar investments made to physical infrastructure, public transport, and the like.

On the other hand, it could be argued by some that infill development over the last 10-20 years has not necessarily been managed appropriately – from a character viewpoint. Differing building heights, setbacks, materials, building styles introduced to established areas have drawn mixed responses.

Question: Where is the next generation of strategic infill sites?

Commentary on various strategic infill sites (within Port Adelaide Enfield) is discussed elsewhere in this submission. Regardless of their exact location, it is important for the State Government to provide increased public transport services for these sites (e.g. Lightsview, Oakden, and Gilles Plains). If satisfactory public transport services cannot be provided, it may be worth avoiding increased densities in those locations.



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

Three factors include:

- (1) A recognition that some industrial uses (especially those of the scale in Wingfield/Gillman) may be at risk of land use conflict, given the range of (non-industrial) uses contemplated in the Strategic Employment Zone
- (2) The gradual reduction of existing industrial land supply in urban Adelaide, where developer-funded amendments rezone industrial land to other uses
- (3) The need to provide physical infrastructure in portions of Gillman and Wingfield (and questions over who will fund it)

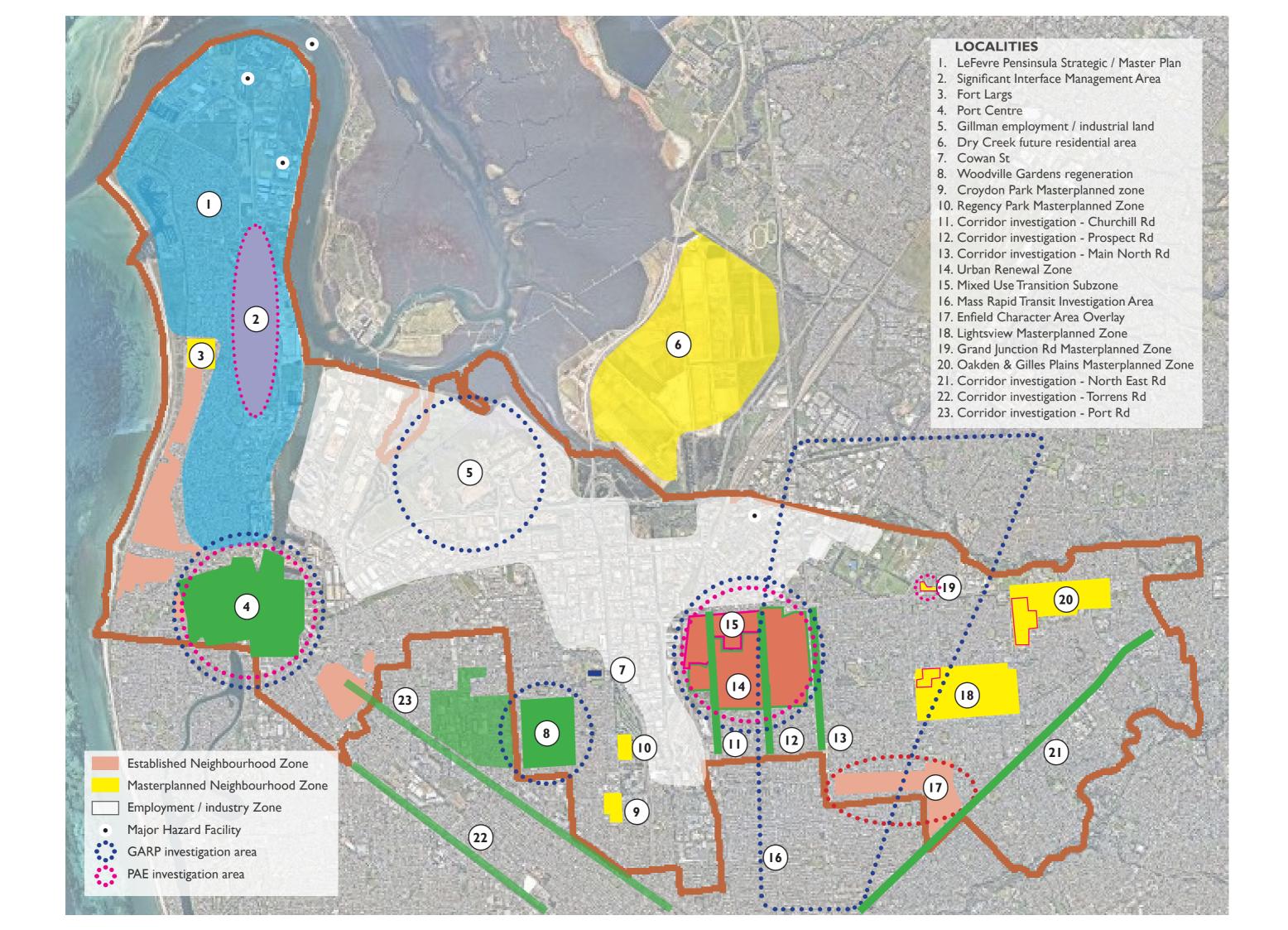
Question: What are the most important factors for the Commission to consider in meeting future demand for open space?

Four factors include:

- (1) The appropriateness of the statutory 12.5% open space requirement in meeting 21st century circumstances; and
- (2) Whether private open space provision in certain residential/neighbourhood zones should be increased beyond 24m².
- (3) The interplay between formal and informal uses of open space for recreational uses (e.g. the demands of sporting clubs)
- (4) An increased reliance upon Council-owned public open spaces by private organisations (such as private schools).

5. Attachments

[A3 spatial map overleaf]



DTI:PlanSA Submissions

Scott McLuskey < From:

Monday, 6 November 2023 2:15 PM Sent:

To: DTI:PlanSA Submissions

Subject: Submission - City of Prospect - Greater Adelaide Regional Plan Discussion Paper - 06 November

2023

Attachments: Letter to State Planning Commission - Greater Adelaide Regional Plan Discussion paper -

06.11.2023.pdf

You don't often get email from

. Learn why this is important

Good afternoon,

Please find attached a submission from City of Prospect in relation to the Greater Adelaide Regional Plan Discussion Paper.

Please do not hesitate to contact me if I can be of any assistance in relation to this submission.

Best regards,

Scott McLuskey

Manager Development and Regulatory Services

Payinthi - 128 Prospect Road, Prospect, SA 5082 | PO Box 171, Prospect SA 5082

City of Prospect acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains region, and we pay our respect to Elders past and present.















6 November 2023

State Planning Commission
Department for Trade and Investment
Via email: plansasubmissions@sa.gov.au

Payinthi
128 Prospect Road
PO Box 171
Prospect SA 5082
Telephone (08) 8269 5355
admin@prospect.sa.gov.au
www.prospect.sa.gov.au

Dear Sir/Madam,

Greater Adelaide Regional Plan Discussion Paper City of Prospect Submission

Thank you for the opportunity to provide feedback on the Greater Adelaide Regional Plan Discussion Paper.

The Discussion Paper is wide reaching, addressing aspirations and questions across a broad geographical area, and City of Prospect considers that communities in other parts of the Greater Adelaide region are best placed to provide feedback on their local challenges and opportunities. For this reason, City of Prospect has focussed its feedback on issues or strategic directions foreshadowed in the Discussion Paper that will directly affect our community.

City of Prospect emphasises the following key points:

- The Greater Adelaide Regional Plan should contemplate improved design quality, right-timed infrastructure delivery, and the tools needed to empower relevant authorities to achieve these outcomes, as being critical aspects of community supported housing growth.
- Achieving housing growth through demolition of character homes is not supported, but approaches to housing growth that retain character homes such as the Future Living Code Amendment are supported (in principle).
- Housing supply within Prospect's Urban Corridor Zones has been constrained due to policy changes introduced through the Planning and Design Code. These policy positions, including particularly reduced minimum dwelling densities, should be reversed.
- Financing and the structure of builder's licenses are impacting upon the success of Prospect's Urban Corridor Zones at delivering the amount and quality of housing growth desired.
- Council is open to investigations of re-zoning, though preliminary investigations suggest that several of those areas identified in the Discussion Paper will not provide real opportunities for housing to be delivered. Review of the Housing Diversity Neighbourhood Zone though is supported (in principle).

Further detail in relation to these matters, together with additional points of feedback, are provided following:

High Level Feedback

Council is disappointed that despite the length of the document and breadth of matters
covered, the only questions and foreshadowed actions in the Discussion Paper relate to new
housing growth. Whether intentional or not, this gives the appearance that any aspirations
the State Planning Commission has in relation to climate change resilience, open space,
biodiversity and the like are lower priorities than housing growth, and signals a potential shift
in regional planning within South Australia towards a 'growth at all costs' position.

In Council's view it would have been better if the Discussion Paper had been considerably shorter if the only information sought was early feedback in relation to housing growth, or that some vision be described through the document as to how the State Planning Commission anticipated that the regional plan might advance its other aspirations.

Issue of Social License

Anecdotal feedback received from the Prospect community, and visible in discussion in other
communities following the release of the Discussion Paper, suggests that there are several
primary reasons that social license has been lost for housing growth. At a high level, Council
receives regular feedback that the poor design quality and execution of housing
developments in the last 15 years within the suburb are a primary driver of opposition to
infill development.

The issues raised include the design and appearance of dwellings, the lack of landscaping and tree canopy, inadequate car parking and/or access arrangements, and the impacts during construction of damage to roads, footpaths and fences by builders without notification or proper and timely rectification.

While not related to Prospect directly, the lag time and/or gaps between the construction of housing and the provision of infrastructure in the outer suburban/peri-urban areas of Greater Adelaide, including alternative transit networks, road connections, schools, community centres, public open space, retail facilities and the like Discussion around infrastructure gaps/shortfalls, including alternative transit networks, has a compounding impact on the view of the community that housing growth is happening in a haphazard, uncontrolled and unsupported fashion. This too has impacted upon the social license for future housing growth.

It is the view of Council that if the State Planning Commission is seeking to understand the factors linked to the loss of social license for housing growth, the question posed within the Discussion Paper of 'where housing growth should occur' is the wrong question, and asking it is unlikely to assist in gaining fresh social license. Council recommends that the State Planning Commission should give significant consideration to improving the design quality and supporting infrastructure provision (including the timing of infrastructure provision) associated with new housing, together with greater enforcement tools to manage poor behaviour of builders and contractors on site.

Specific Housing Policy Matters within City of Prospect

• In reviewing the growth assumptions that underpin the Discussion Paper, through the 2021 and 2022 Land Supply Reports, it is evident that there are gaps and inconsistencies in the way that housing supply projections within Prospect have been prepared. It is Council's view that a rudimentary analysis of the projections demonstrates that they are unsafe and in need review concurrent with the preparation of the draft Greater Adelaide Regional Plan.

A summary of concerns relating to the Land Supply Report projections is provided as an attachment to this submission.

• While it is assumed to be an unintentional change, the State Planning Commission has substantially diminished the dwelling supply capacity of Council's urban corridors through the enactment of the Planning and Design Code. In a technical sense, this has occurred by reducing the minimum residential density expected from new developments when compared to Council's Development Plan (for example, a minimum of 70 dwellings per hectare was expected for properties on Churchill Road but this has now been reduced to a minimum of 35 dwellings per hectare).

Council has already seen an effect from this change, with applications lodged for three, two storey dwellings on an allotment that was anticipated to potentially accommodate five-six three storey dwellings or 12-15 dwellings within an apartment building. Importantly, corner allotments have been targeted for these low yield developments, reducing the capacity for property amalgamation to occur delivering higher quality apartment and/or townhouse developments at scale. A basic analysis of the difference in dwelling yields between the Development Plan and Planning and Design Code policy settings is provided below:

Minimum Dwelling Densities	2020 Capacity	2023 Capacity	Difference
All Urban Corridor Zoned Land	3,935	2,029	-1,906
Churchill Road	2,716	1,143	-1,573

Council rigorously tested the minimum residential density policy settings as part of its 2017 Urban Corridor Development Plan Amendment, to ensure that these settings did not conflict with the design quality policy settings in the Urban Corridor Zone. It is Council's view that the State Planning Commission should review policy settings within Urban Corridor Zones and restore the minimum residential densities which existed in Council's Development Plan.

 Compounding the above, Council is concerned that the policy settings of the Planning and Design Code do not adequately resolve the impact of at-grade car parking diminishing available land that could be used for housing within Urban Corridor Zones. It is recommended that policy settings be enacted in the Planning and Design Code that disincentivise the extensive use of land for at-grade car parking, as has been seen in a number of development applications in Prospect (such as Kaufland on Churchill Road and ALDI on Main North Road):



(Aerial image of ALDI supermarket on Main North Road; new single storey building in Urban Corridor Zone using 31% of the site for building footprint with vast majority of remaining space used inefficiently for at-grade car parking)



(Street view image of ALDI supermarket on Main North Road; new single storey building in Urban Corridor Zone using 31% of the site for building footprint with vast majority of remaining space used inefficiently for at-grade car parking)

 Council does not support housing growth being achieved through the demolition and subdivision of properties in Character or Heritage Areas. Clear and consistent feedback from our community over many years has led to Council having a well-established strategic policy position of seeking transformative growth in its urban corridors while maintaining its highly valued character streetscapes. Council is however supportive, in principle (noting the importance of establishing the right design quality, consumer protection and infrastructure policy settings to avoid mischievous use of the policy intent), of creating additional dwelling opportunities in these areas through models such as co-housing where the existing dwelling is maintained and adapted. While Council had initially pursued this idea with a view to providing options to our community to age in place, it seems apparent that a broader demographic of owners/occupiers may benefit from this approach.

Following from the above, Council is open to hosting pilot projects in our area following the commencement of the relevant Planning and Design Code policy (subject of course to a suitable site/developer being identified).

• The Discussion Paper identifies an intent to investigate the Housing Diversity Neighbourhood Zone that applies to Regency and Hampstead Roads. Council's Assessment Panel and development assessment staff have each indicated that the Housing Diversity Neighbourhood Zone is not achieving desirable outcomes, due principally to the lack of design quality policy settings in that zone together with a focus on delivering medium density infill via reduced allotment sizes only.

In this context Council indicates that it is not opposed to reviewing its Housing Diversity Neighbourhood Zone areas, with the potential for alternative forms of medium density dwellings to be developed in these areas of greater external and internal design quality.

• The Discussion Paper identifies an intent to investigate the extension of Council's existing Urban Corridor Zones such that they apply to the entirety of the three primary north-south arterial road corridors through Prospect. It is observed that the current boundaries of the zones were established having regard to the Overlays that applied to those areas, and there has been no obvious change to that context that would justify amended zone boundaries.

Council advises that it is opposed to extending its Urban Corridor Zones through Heritage Areas or Character Areas with high concentrations of Heritage Listed Places (including particularly extensions to the Urban Corridor Zone at the southern ends of Churchill Road and Prospect Road).

 The Discussion Paper also identifies an intent to investigate the application of the Urban Corridor Zone to North East Road. Council is not necessarily opposed to rezoning North East Road, but this would need careful consideration to ensure that important retail and service amenities are retained, complex east-west traffic management issues are addressed, and heritage assets in this precinct protected.

Council has undertaken some preliminary investigations in this precinct through its Strategic Planning and Development Policies Committee in 2022, with the Committee ultimately determining that a change in zone was unlikely to provide any new dwellings (or meaningfully improve access to services/amenities in this precinct). While Council is not opposed to further investigations, it also does not intend to proactively pursue rezoning in this precinct for this reason.

Non-Planning Policy Issues Affecting Housing Supply

 Coupled with the reduction in minimum density policy settings, Council observes that builder's licensing in relation to Class 1A dwellings has influenced strong demand for lower density two storey dwelling projects in Urban Corridor Zones. Licensing conditions limiting construction of three storey dwellings are acting to distort demand and usage of land in our Urban Corridors – reducing the number of dwellings delivered.

While this issue may be beyond the scope of the Greater Adelaide Regional Plan itself, Council recommends that the State Planning Commission turn its mind to the way that builder's licenses could be structured to prevent a potential constraint to achieving housing growth in inner Metropolitan areas.

• City of Prospect commissioned Adelaide University to prepare a discussion paper to help understand the challenges and opportunities that exist in relation to the financing of development as a constraint upon housing growth. That discussion paper observed:

<u>In summary</u>, it is generally not an inadequate supply of land nor is it the case that the planning system/city planning development approval system (notwithstanding there is sometimes further work to complete city master plans), nor council approvals and regulations that have contributed to a housing shortage.

Rather the principal concern has been how to finance development.

Extensive discussion on the issue of financing is not provided here as these matters appear to be beyond the scope of the Greater Adelaide Regional Plan itself, however Council recommends that the State Planning Commission should turn its mind to providing feedback to the State Government about the impact of financing in relation to housing supply. Labour and materials shortage impacts have received high profile media attention in recent years due to the impact of COVID-19, but are not the only important constraints that require attention in order to achieve housing growth beyond the planning system.

I trust that the above and attached constructive feedback is of assistance. Should you have any queries, or for your direct response, please contact Council's Manager Development Services, Scott McLuskey

Yours sincerely

Chris White
Chief Executive Officer

Attachment 1 - Detailed Consideration of Land Supply Report Analysis

Council observes that no actual land or dwelling supply analysis has occurred within the Urban Corridor Zones in City of Prospect, despite Council's strategic intent that these will be the primary growth areas within the City. The Land Supply Reports project that 64 dwellings will be constructed in the Urban Corridor Zones each year in the City of Prospect, on the basis that this is the average rate of construction in the last five years, and that this will continue for 15 years before ceasing due to a lack of available land.

On the other hand, the Land Supply Reports project that over a thousand new homes will be developed in the next 10 years through the demolition and subdivision of properties in Prospect's Character and Heritage Areas. This projection was derived by comparing the size of land against policy settings in the Planning and Design Code, together with consideration of the value of land before and after undertaking such developments.



(Extract of Land Supply Report 2021 detailing projections for short term and medium term infill development in Prospect's Character and Heritage Areas)

These divergent projection models conclude that a total yield of approximately 2,850 new dwellings will be constructed in Prospect in the next 15 years, with 47% of these new dwellings to be constructed in Urban Corridor Zones. To test the safety of these assumptions, Council staff have

tested the use of the projection models in a reversed fashion (i.e. market analysis within Character and Heritage Areas, and land supply analysis within Urban Corridor Zone areas).

Since the commencement of the Planning and Design Code, 75% of dwelling applications lodged within Prospect's Character and Heritage Areas were for replacement dwellings (59 of 77) and 25% were for subdivisions (18). It is also more common that subdivisions do not progress to full development approval, with 80% of approved dwelling applications in that time period being for replacement dwellings. Assuming that all of the properties identified in the Land Supply Report for short term development are developed, market trends thus consider that 300 dwellings will be constructed in Prospect's Character and Heritage Areas in the next 15 years.

Equally, Council staff have analysed the total available land within the Urban Corridor Zones and concluded that under the current policy settings of the Planning and Design Code (a 35 dwelling per hectare minimum net residential density) a total yield of 2,029 dwellings should be expected (noting that this conservatively assumes no residential development of Main North Road due to there being no minimum density that applies in that zone).

The significant difference in projection outcome through the use of these models reciprocally is indicative to Council that the assumptions underpinning the Discussion Paper in relation to baseline housing supply (i.e. without any change to policy settings) are unreliable. It is for this reason that Council has concluded that a review of the projections is required to ensure an accurate basis for developing the Greater Adelaide Regional Plan.

DTI:PlanSA Submissions

From: Sara Hobbs

Sent: Friday, 3 November 2023 2:54 PM

To: DTI:PlanSA Submissions

Cc: Greg Pattinson; Skye Nitschke; Sally Jenkin; Michelle English
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Joint Submission_Salisbury and Playford GARP_2 Nov 2023.pdf

You don't often get email from

Learn why this is important

Good afternoon

On behalf of the Cities of Salisbury and Playford, please find attached a joint submission regarding the GARP Discussion Paper.

We welcome the opportunity to discuss any of the matters raised in the submission with you.

Kind regards Sara



Sara Hobbs

Strategic Land Use Planner

12 Bishopstone Road, Davoren Park, SA 5113

playford.sa.gov.au

playford.sa.gov.au/stayconnected

We acknowledge that we work on Kaurna Country and pay our respects to the Kaurna people and their ongoing spiritual connection to country.





26 October 2023

Mr Craig Holden Chairperson - State Planning Commission Email: plansasubmissions@sa.gov.au

Dear Mr Holden

Submission - Greater Adelaide Regional Plan Discussion Paper

The Cities of Salisbury and Playford are pleased to provide a joint submission on the growth direction of the new Regional Plan for Greater Adelaide.

As a powerhouse in South Australia's defence, technology, manufacturing, and food industries, Northern Adelaide has a critical role to play in the future of South Australia. Together, the Cities of Salisbury and Playford comprise an area of over 500 km², stretching from north of Gepps Cross to the Gawler River. Northern Adelaide contributes \$12.5 billion to the State economy with over 11,500 businesses, including a host of international firms and flourishing entrepreneurs, calling it home. The economic performance of the region directly affects its 250,000 residents and 94,000 local jobs.

Northern Adelaide is also a gateway to the northern and western regions of the State, which are abundant in renewable energy generation, green hydrogen production and critical minerals required for the transition to a low carbon economy. Northern Adelaide's role in delivering value-add products will be critical if we are to increase the complexity of the economy and decarbonise existing industries.

Northern Adelaide is also a gateway to the northern and western regions of the State, which are abundant in renewable energy generation, green hydrogen production and critical minerals required for the transition to a low carbon economy. Northern Adelaide's role in delivering value-add products will be critical if we are to increase the complexity of the economy and decarbonise existing industries.

Northern Adelaide is well-placed to play a key role in the delivery of the State Government's vision for a smart, sustainable and inclusive economy that will improve the wellbeing of all South Australians.

The region:

 Is at the centre of major transport links, including the Northern Connector and Expressway, intermodal rail, Parafield and RAAF airports and only 15 minutes to Osborne and future AUKUS submarine production facilities.

- Supports a diverse and productive economy with a competitive advantage in defence, food processing, manufacturing, knowledge intensive research and logistics sectors.
- Has emerging sector opportunities in space, cybersecurity, Manufacturing 4.0, energy and health manufacturing.
- Has superior research and development facilities, including the University of South Australia, Defence Science and Technology Group, and Technology Park
- Provides tertiary and vocational education opportunities, including UniSA and TAFE SA.
- Supports a diverse and highly skilled workforce.

At the same time, the Northern Adelaide region is facing various economic, environmental and societal challenges, including demand for infrastructure and serviced land, pressure on limited resources, climate change, water and waste management and rising inequalities. An integrated approach to social, environmental and economic policy from all levels of government and in collaboration with industry, research institutions and the community is required to maximise outcomes.

Currently the GARP Discussion Paper is limited to a city-centric approach. The urban structure of metropolitan Adelaide is changing with the vast majority of growth occurring in the outer northern suburbs. This will result in the geographic centre of Greater Adelaide's population moving towards Northern Adelaide. In Northern Adelaide, the residential population is anticipated to grow from 250,000 to 291,000 residents by 2036. Land already zoned for residential development and future residential growth areas will house over 400,000 people in the Cities of Salisbury and Playford.

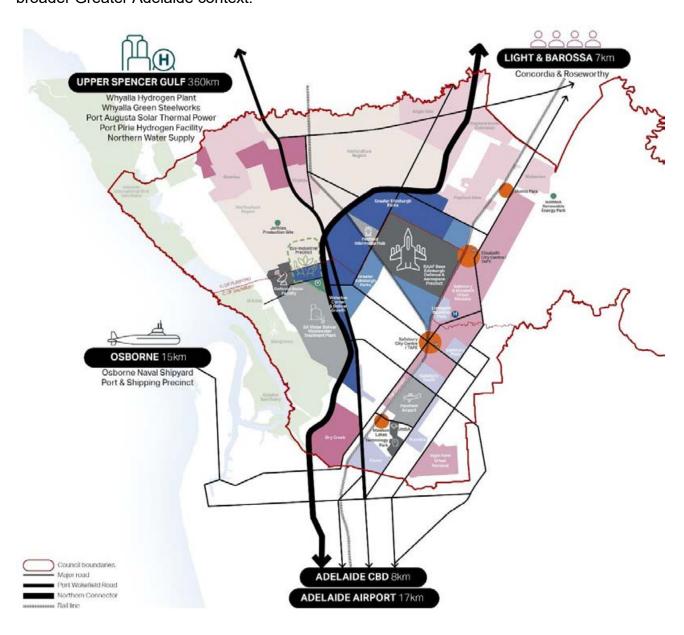
Consequently, greater focus needs to be given to serving this future population with places to work, major health care services (including hospitals and emergency services), education (including universities), regional facilities for sport and recreation, and other social infrastructure. Elizabeth and Salisbury City Centres and surrounds are well-placed locations for these services and to provide vibrant higher density living, mixed uses and destinations of choice.

In addition to residential growth, Salisbury and Playford will provide significant employment lands for at least the next 15 years. Key areas of growth include Greater Edinburgh Parks (GEP), the corridor west of Port Wakefield Road, Parafield Airport, Technology Park and a projected growth at RAAF Base Edinburgh. Key growth areas are represented in the map below.

It is imperative that the State strategically plans for essential infrastructure required to achieve the growth outcomes in the region and considers alternative governance arrangements to ensure coordinated delivery of key infrastructure to facilitate the economic and residential growth opportunities in Northern Adelaide. This needs to encompass the coordination of water, sewer, telecommunications and electricity in

addition to State and Local Government infrastructure such as roads, stormwater and social infrastructure.

With a growing population, not only will residents reside within this area but they will also pass through it to reach workplaces, educational institutions and essential services. Therefore the transportation systems must be planned to facilitate efficient freight transport while simultaneously offering public transportation options that connect employment hubs and service centres with residential areas. The regional map below identifies key growth areas in our Cities and within the broader Greater Adelaide context:



The section below provides further detail regarding the opportunities within key areas:

Greater Edinburgh Parks (GEP)

GEP is currently identified in the 30 Year Plan for Greater Adelaide as 'new strategic employment lands' (p.79) and appears to be represented on Figure 15 of the Employment Future Investigations map (p.158) of the Discussion Paper.

When fully developed, GEP has the capability to host over 37,000 jobs in industries such as advanced manufacturing, logistics and warehousing.

GEP is strategically placed with direct access to the national highway, rail networks and port facilities, emphasising the logistics role GEP can play in supporting Greater Adelaide and the South Australian economy. SCT Logistics has an intermodal facility within the precinct and there is capacity for a second facility to be established on the southern side of the ARTC railway line.

Both Councils have received significant interest in rezoning the GEP land and proposals for rezoning are currently with Planning and Land Use Services. Additionally, existing zoned industrial areas are nearing capacity due to increased development activity in the last 5 years. However, despite the demand, growth is restricted due to the lack of State Government infrastructure. Prompt attention needs to be given to the State's road network in the region to enable growth and associated freight access. Many areas cannot get a viable sewerage connection which is resulting in the underdevelopment of sites because of the limited capacity of onsite systems. Regional stormwater solutions need to also be provided. The costly components include culverts under Port Wakefield Road and still to be defined solutions on SA Water and defence land west of Port Wakefield Road.

The Councils seek State support for rezoning of the precinct to employment lands and implementation of mechanisms to deliver the necessary infrastructure to realise the economic and employment potential of this land.

North-West Economic Corridor

The City of Playford and the City of Salisbury have identified the North-West Economic Corridor as a strategic employment area located between (and adjacent to) the Northern Expressway and Northern Connector. The corridor is bookended by future residential growth hubs at Dry Creek in the City of Salisbury and Riverlea in the City of Playford, which is in its early days of establishment. The Discussion Paper appears to have identified this area as an Employment Growth Investigation Area (p.158), which is supported.

The State Government's Employment Land - Land Supply Report for Greater Adelaide (June 2021) identifies the Outer North region as containing the largest source of future employment land within Greater Adelaide, representing 95% of total supply. However, Greater Edinburgh Parks accounts for the majority of this land supply. The North-West Economic Corridor provides an opportunity to expand the

employment land supply by taking advantage of two key freight routes and providing job opportunities near to growing residential populations.

The Councils consider this corridor a prime location for a green-industries precinct and a place for the processing of minerals for the green economy, exemplified in the proposal by Renascor. It is recommended that the State undertakes an update of the employment land strategy with a focussed lens on green industries and the circular economy, taking into account land requirements and potential industrial synergies such as supply chains and energy/water generation and consumption.

Additionally, the Regional Plan needs to emphasise the importance of coastal areas adjacent to this corridor, noting that it is intended that the current salt fields will be rehabilitated back to a natural state. The International Bird Sanctuary and Dolphin Sanctuary further distinguishes this coastal area as environmentally significant. The extensive mangrove forests and samphire community are of high biodiversity value providing significant fish nursery areas and carbon sequestration. The environmental assets in this region combined with the St Kilda township provide opportunities for value-adding activities associated with education and research, nature-based tourism and recreational activities.

A new Employment Land Strategy should be prepared to inform the Regional Plan taking into account the need for industries to move to a green and circular economy.

The Environmental Significance of the Councils' coastline and the allied advantages should be recognised in the Regional Plan.

Rapid Mass Transit (Freight and People) and East-West Road Connections

Due to the residential growth occurring at Riverlea, Virginia, Angle Vale and Two Wells and future growth earmarked for Dry Creek, combined with future employment growth at GEP and within the North-West Economic Corridor, there is a need to identify suitable options that will facilitate rapid mass transit of people and freight to improve overall transportation access. Options may include changes to existing road networks including the potential of separate corridors for freight and people and consideration of converting existing infrastructure assets to achieve these outcomes.

The improvement of east-west connections throughout the Cities of Salisbury and Playford is becoming critical with the increase of vehicular movements:

- Within Salisbury Council the capacity of Kings Road and Waterloo Corner Road needs to be improved; Elder Smith Road needs to be extended and duplicated; and a road/rail separation of Park Terrace and Kings Road is required.
- Within Playford Council upgrades to Curtis, Womma, Angle Vale, Heaslip and Dalkeith roads is required including key intersections with NEXY and Main North Road (primarily for Curtis and Womma roads).

Without these improvements to mass transit of people and freight, future traffic congestion issues will impact people's quality of life, health and productivity in the region as well as impact the environment through vehicle emissions. A 2019 analysis of Adelaide's traffic congestion by Infrastructure Australia found the annual cost of road congestion was approximately \$1.4 billion with north-south roads being the most congested (as at 2016). A 2023 benchmarking report found that Adelaide was the only peer city where hours lost to congestion rose since 2019.

It is important that preliminary investigations are undertaken now to identify a suitable mass transit option to service future residents and workers, and also provide appropriate transport logistical systems for freight movements.

The importance of providing effective East-West linkages must be viewed in the context that these are critical elements of economic infrastructure required to both facilitate and support the overall economic development opportunities in this precinct.

We would welcome the opportunity to engage further with the Commission and PLUS on these matters and contribute to any investigations.

Please contact Dr Greg Pattinson, Executive Strategic Advisor at the City of Playford on 8256 0176 or gpattinson@playford.sa.gov.au or Ms Michelle English, General Manager City Development at the City of Salisbury on 8406 8222.

Glenn Docherty Mayor City of Playford Gillian Aldridge OAM Mayor City of Salisbury

Yours faithfully

DTI:PlanSA Submissions

From: Exec Office <

Sent: Monday, 6 November 2023 9:01 AM

To: DTI:PlanSA Submissions

Cc: John Harry; Michelle English; Sally Jenkin

Subject: City of Salisbury Submission - Greater Adelaide Regional Plan **Attachments:** City of Salisbury Submission - GARP November 2023.pdf

You don't often get email from

Learn why this is important

Good morning

Please find attached the City of Salisbury's submission in relation to the Greater Adelaide Regional Plan.

Kind regards

Belinda Hanlan

Executive Assistant to CEO/Mayor

CEO & Exec

D: E:

City of Salisbury

34 Church Street, Salisbury, South Australia, 5108

P: 08 8406 8222

W: www.salisbury.sa.gov.au



City of Salisbury ABN 82-615-416-895

34 Church Street PO Box 8 Salisbury SA 5108 Australia Telephone 08 8406 8222 city@salisbury.sa.gov.au

www.salisbury.sa.gov.au

Contact: Telephone: Peter Jansen

State Planning Commission
Via Email: plansasubmissions@sa.gov.au

Dear Commission Members

Re: Greater Adelaide Regional Plan - City of Salisbury submission

The City of Salisbury thanks the State Planning Commission for the opportunity to make comments on the Greater Adelaide Regional Plan Discussion Paper.

Council has considered this matter at its October 2023 round of meetings. The following comments are submitted for consideration in response to the Discussion Paper.

As background, Council is also preparing its City Plan and Growth Strategy, and has undertaken a Strategic Growth Framework for an area west of Port Wakefield Road that is essentially north of the Little Para River. These documents have also Informed Council's response, in addition to the GARP Discussion Paper.

The Council believes it is well advanced in its strategic planning for growth:

- The Strategic Growth Framework provides clear direction for the rezoning of land west of Port Wakefield Road and is guiding Code Amendment proposals
- Salisbury City Centre revitalisation agenda
- Planning and delivery of strategic residential infill providing housing choice and affordability.
 E.g. Lake Windemere and Walkleys Road Corridor
- · Participation in Dry Creek Salt Pans cross government CEO's working group
- Participation in Parafield Airport Masterplan identifying employment opportunities.
- Participation in cross Government North-Western growth and infrastructure Executive Steering Group

In addition to the above, Council recognises a number of trends and influences attributing to growth in the Council area and northern region. This includes:

- Residential areas experiencing significant infill development
- Decline of housing affordability and availability
- Desirability for high-tech and defence industries close to the RAAF base and Technology Park
- Proximity to the Northern Connector is driving growth in warehousing, transport and logistics hubs
- New and emerging industries e.g. onshoring of supply chains, green and circular economy, advanced manufacturing.
- Industries seeking larger sites to relocate or expand.
- . Doubling of employees at the RAAF in the next 10 years
- · Increase in commercial and retail development at Parafield airport.

It is imperative that the planning system is an enabler to the growth opportunities and attracts new innovative economic and residential development that responds to emerging trends (e.g. climate adaptation, de-carbonisation, smaller households, working from home, impacts of AI and technology)

on built form, transport and communities. Well planned and co-ordinated infrastructure delivery is essential to make this occur. This is not just for the benefit of the region, but for the State.

To this end, Council has been collaborating with the City of Playford in delivery of co-ordinated growth for the two Councils. The Councils have also advocated for a cross-government Steering Group for the North West Adelaide Economic Corridor. The City of Salisbury has collaborated with the City of Playford in the preparation of a joint submission on the GARP Discussion Paper.

Discussion Paper missed opportunities

It is noted that the Discussion Paper seeks to elicit comments for consideration in the final version of the GARP, and that it therefore is not a draft GARP. The Discussion Paper identifies four outcomes for Greater Adelaide and refers to the challenges for the Region such as climate change, sustainability, and social cohesion. However, the Discussion Paper is then focussed on the housing sector and the questions of where and how it will be occurring that are prompted essentially along the lines of the existing paradigm. The questions of how these areas are being serviced and connected in a manner that enhances the local area and the region need to be answered. This includes aspects such as hard and social infrastructure, public transport, active living, and employment lands and the need to move away from the focus on Adelaide towards a polycentric approach.

The Salisbury experience to date has been the difficulty in bringing State Government agencies on board to supply services in alignment with the current 30 Year Plan and zoning changes, and reinforcing public transport along the current patterns to Adelaide. East / west road movements need immediate action especially Kings Road and Elder Smith Road, as do public transport initiatives that provide services across the region.

Greater emphasis on housing potential along corridors and centres, and how the urban form and social/community expectations and necessities might transform within the 30-year outlook is warranted without consolidating the existing urban spread across the region.

How to achieve more equitable and socially cohesive places

There are challenges linking population growth and needs of the community with the Government forward planning on social infrastructure that is not limited to education, schooling and public transport provision. This also applies to the sequencing of roads, water and sewerage. Funding is not currently aligning or responsive to growth. State Government infrastructure provision is the biggest constraint to getting investment in our area.

In addition, there needs to be increased collaboration between Governments on areas for focussed infill to enable quality outcomes for the community so that those that choose to live in higher density living have quality public realm offerings for safe and accessible active transport, including walkability and recreational options incorporating biodiversity enhancement. This also applies to the mechanisms and tools used for funding local government investment.

The City of Salisbury has a strong community despite it being of low socio-economic status. There is significant inequity, in terms of provision and access to public transport, health and education facilities.

There needs to be consideration of global, national and local trends (e.g. climate adaptation, decarbonisation, smaller households, working from home) and demographic changes and their implications for traditional zoning, built form, transport and the community.

The housing supply debate needs to be elevated to incorporate housing affordability, social housing and support services and high needs principles. It is expected that the GARP will incorporate strategies recognising the Federal Housing Australia Future Fund opportunities to access supply of social and affordable rental housing, the additional funding of the National Housing Infrastructure Facility for new homes, and the housing reform agenda proposals of the Federal Government.

Planning and Design Code policy needs to provide greater opportunities for secondary dwellings. Consideration needs to be given to the cultural needs of our migrants who may prefer to live with their broader family networks requiring different housing forms. Incentives need to be given to those that amalgamate allotments to create better housing forms.

Employment Lands

Additional consideration needs to be given to future industries to ensure that South Australia, and the region, is an attractive place to invest for new and developing industry sectors. This is critical to ensure we can leverage off the current growth, investment and advances in defence, green energy and the supporting resources, the circular economy and a more complex economy. The synergies required for strategic infrastructure and proximity to the labour force, higher education facilities and other industries should be a priority and these land requirements should be considered prior to identification of residential expansion. The newly created Housing Infrastructure Planning and Development Unit is focussed on helping drive residential developments and coordinate its infrastructure investment, and requires immediate expansion to recognise the need for the delivery of employment lands. It is critical to assist this sector to support residential growth.

The large employment land holdings in the City of Salisbury has a hinterland far beyond its boundary, and must be supported in a multi strategy approach to connect the population with the jobs.

A comprehensive employment lands strategy should be prepared as the statistics in the Discussion Paper regarding 10 years supply of industrial land in the region do not reflect the current immediate pressures for development that our council is currently experiencing.

It is recommended that further work is undertaken regarding employment lands classification, land requirements and demand and supply so it meets the needs of the Region's future. Consideration needs to be given of the importance and role of eco-industrial parks. How the Planning and Design Code zones facilitates the types of employment land uses for the future also needs to be considered.

It is also important that strategic employment lands are also future proofed, not just by managing buffers to sensitive land uses, but by ensuring sufficient infrastructure provision of appropriate capacity on time for them to grow and adapt in the future. Transport systems must be linked to growth areas for employment lands. To understand the future supply of employment lands, consideration needs to be given to the climate change risk assessment currently being undertaken by the State Government as sea level rises and increased rainfall events may impact on supply.

The State must take the lead in providing clear costing and sharing arrangements for infrastructure to facilitate the achievement of the GARP strategies.

Greater Adelaide Urban Structure- Salisbury City Centre

The Discussion Paper promotes a monocentric approach to centres and needs to state what the role of the Adelaide City Centre will be in the future. It is considered imperative that a polycentric approach be adopted as the Region develops. Public transport investment and corridor development is still focussed on access to the City Centre. Many of the City of Salisbury's residents do not travel to the city each day and there needs to be better public transport connections between where people work and where they live, including east-west connections into other Council areas.

As proposed in the Discussion Paper, the Salisbury City Centre should be a focus for regeneration and a destination for people in the northern Adelaide region. Council has focussed its attention on rejuvenation of the centre for a number of years. It has the attributes for a vibrant mixed-use centre with fixed public transport connections, combined with a mixture of retail, entertainment, restaurants, local, state and federal services, recreation and open space for the needs of the regional community. Council has and will continue to develop and invest in the City Centre through its significant land holdings over the next few years to make it an even a more attractive place to invest in and visit.

Whilst the Council continues to work on the regeneration of the City Centre, this area also has our lowest socio-economic status. Affordable housing and homelessness are a significant issue in our Council area and providing housing for these vulnerable people is critical.

Green space should not be provided through public reserve creation only. Policy must support streetscape designs that cater for large trees, biodiversity enhancement, and drainage, as well as carparking, energy and infrastructure supply and waste requirements. A granular level of design will allow greater flora and fauna movement across suburbs and areas. Consideration of built form and public realm design must also consider design for wellbeing.

Infill development must recognise impacts on existing infrastructure and the need for upgrades to trunk infrastructure in existing areas along with the new developments. Public transport must support infill development and be established in time to cater for population growth in these areas.

Reconsideration of the Planning and Design Code standards for allotment level stormwater or retention should be undertaken in conjunction with the climate change impacts.

Greenfields

Dry Creek will provide the next tranche of significant population growth for our council providing for approximately 10,000 dwellings. Detailed master planning for Dry Creek has yet to substantially commence and it is likely that the infrastructure and building costs will be substantial. The development of this land is likely to have a 20-year lifespan. This is a significantly large piece of land close to the centre of Adelaide and it should be developed with consideration of the technological advances and changing societal expectations that are likely to be experienced over the next 20-years. For example, the use of driver-less-vehicles, public transport modes, decoupled carparking, higher residential densities, as well as different ways of providing open space and recreation areas and biodiversity linkages.

Strategic Infill

Council has an ongoing program for developing its underutilised land for projects that provide a community benefit such as affordable housing, with upgrades to public realm. The development at Lake Windemere has just started with 35 dwellings being constructed and a proposal for approximately 220 dwelling at Walkleys Road Corridor is currently processing through legal requirements.

There are also 26 large undeveloped horticultural land holdings within the residential areas west of Salisbury Highway that have the potential for strategic infill. However, these are currently not well serviced by public transport and other services.

General Infill

The City of Salisbury is currently experiencing an increase in 2 for 1 development with some 3 for 1 developments. This is expected to continue for the foreseeable future as our housing stock gets older and land prices increase. Unlike inner and other middle ring suburbs of Adelaide, Salisbury has no character or heritage areas recognised in the Code. However, Council seeks to protect the unique character of St Kilda and Globe Derby Park.

There are challenges with new and existing infrastructure capacity and costs to Council as infill continues in the Council area. The Planning and Design Code enables development without consideration of the local street infrastructure issues that can put dwellings at risk from matters such as stormwater intrusion.

The majority of the housing in Salisbury is in the General Neighbourhood Zone, and is limited in its mixed use due to historic single use emphasis in the planning controls. The need to service the newer infill areas will be a difficult balancing process. The Discussion Paper refers to the differing housing options and should be encouraged where appropriate. Policy changes to the Planning and Design Code will be expected to cope with co-use of street areas and common spaces, combined with improved architectural standards and streetscapes.

Further exploration needs to occur on policy approaches that facilitate increasing affordable and diverse housing without detrimentally impacting the suburban character and amenity of existing low-density areas (e.g. Ingle Farm). Given the low service of public transport in this region, our residents are reliant on vehicles to get around. The combination of significant infill, insufficient car parking requirements per dwelling (e.g. Mawson Lakes standard is 0.75 carparks per dwelling) along with societal trends such as young adults living longer in the family home, many areas are experiencing parking congestion and unsafe traffic conditions in local streets.

Activity Centres and Corridors

There are some activity centres within the Salisbury Council that have the attributes for focussed attention on mixed uses and higher density living and to create the benefits of local living.

Ingle Farm is a large shopping centre, with surrounding services such as medical, childcare, social services, primary schools and adult learning, council recreational centre and library, and multiple ovals and sports facilities. Coupled with reasonable public transport the centre provides significant potential for rezoning and working with land owners to provide a more vibrant mixed used activity centre.

There is also the opportunity for increased densities along the passenger rail line between Mawson Lakes and the Salisbury City Centre to take advantage of the services at these centres and along the corridor. It is suggested that the GARP consider the extension of existing higher density corridors into the City of Salisbury and the potential for corridors at other major centres such as Mawson Lakes and Salisbury Centre.

Given the significant proportion of migrants in Salisbury, there is also increasing demand for new Places of Worship to service the variety of faiths they bring. While we strongly support the concept of local living, Places of Worship within residential zones should be limited in scale so residential amenity is not impacted by noise and traffic. Employment Zones often provide sufficient allotment sizes and buffers to sensitive land uses for larger scale Places of Worship and as such this land use is supported in these zones.

Urban Greening

There needs to be a focus on streets providing biodiversity corridors, as while vegetation in the public realm comes at cost it will become increasingly important. A focus on greater residential density within existing areas may result in less private open space and a move to the provision of community open space in streets and elsewhere. Smaller allotments and housing sites restrict the opportunity to plant trees and shrubs, and have grass land.

Urban greening targets need to distinguish between zone type, and must recognise employment lands as a source for greening improvements.

In vibrant mixed-use communities, there is a need for quality public realm, open space, roads, footpaths and general urban design elements that seek to improve the community's wellbeing. There should be a better method for the community to contribute to these upgrades by making better uses of offset schemes and including public realm and open space into the scope for infrastructure schemes.

The Planning System needs improved policies to protect existing vegetation rather than contribute low monetary values to funds that do not necessarily repair the affected area. This is the same for the open space contribution scheme.

Furthermore, the future recreational needs of our population must be considered. Recreation and sport is important for a community's health and wellbeing. There is already significant demand for Adelaide's sporting grounds. A strategy needs to be considered about how we can cater for both an increased population and the impacts of climate change (increased heat and severe rain events) on sporting grounds.

Other recreation and open space issues that should be reconsidered include:

- access to underutilised open space and recreational areas in schools that are only used during school hours.
- That some Councils maintain a significant amount of regional open space that is provided for the regional community.
- The 12.5% open space allocation in the planning development application process needs to be reviewed in response to the matters raised elsewhere in this submission.
- The needs to define that some open space is not for recreation uses, but for biodiversity and stormwater purposes.
- The provision of water bodies for water recreational sports particularly as a cooler environment.

Urban Green Cover targets must reflect the uses within Council areas, for example the fact that the City of Salisbury has two large airport areas skews the green cover targets. These areas also impact on the extent of protected areas beyond the airport boundaries to meet Commonwealth requirements for airport protections.

Water security and supply options and costs of irrigation standards needs to be considered in the GARP. Council supports the Resilient Water Strategy.

Housing Diversity

It is promising to note the Discussion Paper references the newer types of housing modes that will be needed to cater for the next 30 years of demographic change. It is suggested that Strategic Infill sites should also have a 'Housing Diversity' target additional to affordable housing targets.

The increase in two storey dwelling types and other multi-level buildings increases the need for building design to reflect ageing in place, multi-use and adaptable housing design, at the time of housing construction.

Financial incentives, or removal of disincentives should be available to those that want to downsize, so as to free up housing.

Transport

The transport policy must recognise that the northern Adelaide region of GARP will become the focus of business and employment lands within the time span of this GARP and with the modelled population increase. This will demand extra infrastructure and resources in all modes of transport and must be planned and delivered prior to the business growth. This must be based on the polycentric approach to the region, and immediate improvement to the east-west linkages must be identified in policy and delivered.

The Salisbury Focus Areas for Transit Focused Development are:

- Salisbury City Centre and surrounds
- Remaining opportunities at Mawson Lakes
- Mawson Lakes to Salisbury City Centre railway corridor

Rapid public transport is focussed on connection to and from the City which is a disconnect with the majority of the community working within Council or in adjoining suburbs. Public transport is not serving community needs sufficiently. Mass transit should include Ingle Farm and Pooraka given the

increase in infill and the low socio-economic status. There is support for passenger rail to Two Wells, however there needs to be a plan for mass public transit to Dry Creek and Riverlea (and expanded areas). This is an opportunity to plan for increased densities at Dry Creek that would result from the provision of public transport at the time of development.

Future transport modes such as driverless vehicles and buses must be understood and accommodated in policy planning and strategy. There may be impacts on road networks and designs, and carparking demand, and connections to other transit points and types.

Activating Centres

The GARP policy must increase its promotion of housing that is located above retail and commercial developments. This will increase the activation of centres along with increasing housing diversity. The Planning and Design Code policy should be reviewed to provide other incentives for retail development to consider more mixed-use approaches and retail centre owners to appreciate the benefits of this housing potential for its centres and their viability.

Protection of natural assets and food production area

The Environment, Food and Production Areas, Hills Face zones and watershed should continue to be protected due to their value in Adelaide's access to food, clean water and protection of biodiversity areas.

The Regional Plan should also reflect the importance of the mangroves, Dolphin Sanctuary and the International Bird Sanctuary in terms of their importance for carbon sequestration, biodiversity and eco-tourism opportunities. Consideration must be given to protecting these areas from land use change and sea level rise, and enhancing their economic value through the development of tourism and education interpretive facilities at St Kilda.

Should you have any queries in relation	to the above matters	please contact Ms Sa	ally Jenkin,	Team
Leader Strategic Urban Planning on	or at			



DTI:PlanSA Submissions

From: Lewig, Jessica

Sent: Thursday, 2 November 2023 9:38 AM

To: DTI:PlanSA Submissions

Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater Adelaide Regional Plan~ssion - November 2023 - Signed.pdf

You don't often get email from

Learn why this is important

Attention: Growth Management Team, Planning and Land Use Services

Good morning

Please find attached the City of Tea Tree Gully's submission on the Greater Adelaide Regional Plan Discussion Paper.

Please do not hesitate to contact me if you have any gueries.

Kind regards Jess

Jessica Lewig | Lead - Urban Planning

City of Tea Tree Gully Civic Centre, 571 Montague Road, Modbury

D T 08 8397 7444

PO Box 571, Modbury, SA 5092 www.teatreegully.sa.gov.au

My working days are Monday-Thursday



Think green - read on the screen

The information contained in this email and attachments is confidential and may also be the subject of legal professional privilege, public interest immunity and/or copyright. No representation is made that this e-mail or its attachments are free of viruses or defects. Virus scanning is recommended and is the respons bility of the recipient. If you are not the intended recipient, any use, disclosure or copying of this e-mail or attachments is unauthorised. If you have received this message in error, please reply to the sender or telephone #61 8 8397 7444.



Mr Craig Holden Chair State Planning Commission GPO Box 1815 Adelaide SA 5001

1 November 2023 Our ref: D23/90040

Via email: plansasubmissions@sa.gov.au

Dear Mr Holden

Greater Adelaide Regional Plan Discussion Paper - City of Tea Tree Gully submission

Thank you for the opportunity to provide feedback on the Greater Adelaide Regional Plan Discussion paper released for public consultation from 14 August 2023 to 6 November 2023.

At its meeting on 24 October 2023, Council considered the Discussion Paper and its effects on the City of Tea Tree Gully. At that meeting Council endorsed the attached submission which outlines recommendations for further consideration and investigation as part of the preparation of the draft Greater Adelaide Regional Plan.

Council commends the State Planning Commission on the preparation and release of the Discussion Paper, acknowledging the large body of work which has been undertaken to date. Further, the commitment to continue to engage with Council as part of the development of the draft Greater Adelaide Regional Plan is welcomed, noting that Council is also progressing its own investigations into growth planning for the City of Tea Tree Gully.

Should you have any questions regarding the content of Council's submission, please do not hesitate to contact Jessica Lewig, Strategic Urban Planner, on or via email

Yours sincerely

Ryan McMahon

Chief Executive Officer

Greater Adelaide Regional Plan Discussion paper - Submission - CTTG

Ref #	Item	Comments	Recommendations
1	Urban Corridor Investigations	The discussion paper identifies areas for further investigations for corridor growth. It is disappointing to see these areas finish at the boundary of the City of Tea Tree Gully. Given Modbury is proposed as an area of further investigation for neighbourhood and centre regeneration, it is considered appropriate to extend these areas of investigation to at least the Modbury Precinct.	Corridor investigation areas along North East Road and Lower North East Road should not terminate at the border of the City of Tea Tree Gully. Rather these investigations should extend along these corridors through to the Modbury Precinct (identified for neighbourhood and centre regeneration) and beyond to St Agnes activity centre.
2	Public Transport	There needs to be greater scope for GARP to plan for how we can achieve more sustainable mobility. Integrated public transport systems and greater focus on cross suburban connections is needed to achieve the principles of living locally. There is opportunity for GARP to investigate better public transport connections from the City of Tea Tree Gully to areas of high employment for our resident base such as Edinburgh and Port Adelaide as part of the AUKUS planning. Upgrades including extensions to the O-Bahn service area, increasing frequency and reliability of this service, needs to be planned for. In the instance where extensions should be investigated, sufficient land needs to be planned for. Further, planning for improved transport systems and networks need to be undertaken concurrent with identifying areas for increased densities and prior to rezoning.	GARP should set aside land for the extension of public transport corridors including the O-Bahn. It should also plan for increased frequency and level of service in areas where increased population growth is identified. In order to satisfy the Commission's principle of Living Locally, planning for cross suburban public transport connections need to be identified in GARP including from Modbury to Edinburgh and Port Adelaide.
3	Planning and staging of infrastructure delivery	The planning, design and staging of infrastructure delivery to growth areas must be given greater weight. CTTG	In addition to identifying areas for rezoning to increase population growth, the GARP should

	5 <u>1</u>		
		Infrastructure Planning and Development Unit, however it is important that considerations regarding provision of essential services and infrastructure are investigated as a priority in areas where growth has been identified for further investigation. If the current infrastructure capacity is insufficient, planning, design and staging of delivery should be done prior to the rezoning process. It is considered that it should be the role of GARP to identify and plan for the infrastructure delivery for growth areas identified for Greater Adelaide.	also identify the future infrastructure and essential services upgrades that are required in order to service the increase in population in identified growth areas prior to amending the zoning policies.
4	Planning for future health requirements	One of the missing key themes for the discussion paper is health. There is limited discussion regarding planning for future health precincts to service the areas of proposed population growth investigations. This is of particular concern given the anticipated ageing population increase. GARP investigations need to consider the most appropriate location for land for the provision of health services, including additional hospitals, to accommodate the proposed increase residents in the north and north eastern region. GARP must map and identify the location of this land.	GARP should identify land for future health precincts, including additional hospitals, to service the proposed population increase, particularly in the north and north eastern suburbs.
5	Modbury Precinct	CTTG commends the inclusion of the Modbury Precinct as an area of investigation for further neighbourhood and centre regeneration. CTTG has partnered with the State government and invested heavily in the precinct since 2015 in line with the Modbury Precinct Activation Policy which has in turn, stimulated investment by the private sector. It is important that continued investment, revitalisation and activation of the precinct continues in the short and medium term as a priority to build on the work that has	Support for Modbury Precinct to continue being identified as a Major Activity Centre in the GARP Discussion Paper to identify further regeneration and activation opportunities which might be developed in partnership with CTTG.

		already been undertaken to revitalise this major activity centre.	
6	Cost of urban sprawl drawing funding from urban core	There are concerns that the Commission's focus on satellite cities and urban sprawl will be to the detriment of investment in the existing urban core. The more the Greater Adelaide Region sprawls, the more investment will be required to provide new trunk and non-trunk infrastructure to service these satellite urban centres, which will reduce the level of investment in the existing urban area.	GARP to identify continued investment in infrastructure upgrades to support a compact urban form and ensure continued investment in areas identified for population growth and housing diversity rather than investing in infrastructure extensions to support urban sprawl.
7	School infrastructure	Another missing key theme for the discussion paper is education. There is limited discussion regarding planning for future schools to service the areas pf proposed population growth investigations.	GARP should ensure that adequate land is set aside for education establishments to service the proposed population growth in the growth investigation areas.
8	Missing Middle	Housing diversity and choice is something that CTTG has identified as a future challenge for both the city and the region. Current Code policy that allows for high quality medium density outcomes is lacking. As part of the development of GARP, further investigations should be undertaken to develop new planning policy and zones to support the provision of high quality medium density housing in designated areas.	GARP should recommend that the Commission develop new planning policy and zones to support the provision of high quality medium density "missing middle" housing in designated areas.
9	General infill policy	In line with Councils <u>submission to the Expert Panel Review</u> <u>of Planning Reforms</u> , further investigations are required to improve Code policy as it relates to infill housing. Investigations in particular, should consider preservation of tree canopy coverage, provision of sufficient and adequately sized carparking, and minimum dwelling design requirements to ensure adequate storage is provided. Please refer to CTTG's submission to the Expert Panel on Planning reforms for further detail.	GARP should recommend that the Commission undertake future reviews of the Planning and Design Code specifically targeted to improve general infill policy provisions as identified in CTTG's submission to the Expert Panel Review of Planning Reforms.

DTI:PlanSA Submissions

Scott Reardon From:

Thursday, 19 October 2023 4:15 PM Sent:

To: DTI:PlanSA Submissions

Subject: Town of Walkerville - Greater Adelaide Regional Plan Submission

Attachments: Town of Walkerville - Greater Adelaide Regional Plan - 19 October 2023.pdf

You don't often get email from

Learn why this is important

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

Please find attached the Town of Walkerville's feedback on the Greater Adelaide Regional Plan Discussion Paper.

Should you require anything further please do not hesitate to contact me.

Regards,

Scott Reardon

Group Manager Strategy, Governance & Compliance.

TOWNOF



Town of Walkerville

Corporate Services | 66 Walkerville Terrace, Gilberton SA 5081 PO Box 55 | Walkerville SA 5081

walkerville.sa.gov.au

Connect with us



We acknowledge the Kauma people as the traditional custodians of this land and respect their spiritual relationship with their country.



A Please consider the environment before printing this email

This transmission is confidential. This email, including any attachments, is for the original addressees only. Any use, copying or disclosure by any other person is

If you have received his transmission in error, please notify us by email immediately and then destroy the message. Your co-operation is appreciated Virus detection software has been used to detect the presence of any computer viruses, however, we cannot guarantee that this email and any attached files are virus

The views expressed in this document are those of the author and not necessarily those of the Council unless specifically stated.



The Corporation of the Town of Walkerville

ABN 49 190 949 882 66 Walkerville Terrace, Gilberton SA 5081 PO Box 55, Walkerville SA 5081

Record Number: OLT202362773 Telephone: (08) 8342 7100

File Number : 40.96.2.2 Facsimile: (08) 8269 7820

Contact Officer: Planning, Environment and Regulatory Email: walkerville@walkerville.sa.gov.au

Services Team Website: www.walkerville.sa.gov.au

19 October 2023

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

Via email: plansasubmissions@sa.gov.au

Re: The Town of Walkerville – Greater Adelaide Regional Plan Submission

The Town of Walkerville welcomes the State Planning Commission's review of greater Adelaide and its planning needs that seek to address and accommodate growth projections for the forthcoming 30 years.

The Town of Walkerville considers this an important review process which will ensure the viability and sustainability of South Australia in to the future. As such, this submission provides a summary of the key views and opinions of Council, based on their feedback from an Information and Briefing Session held on 9 October 2023. This submission is provided in good faith in order to assist the Commission in their forward planning of the Greater Adelaide Regional Plan, in relation to the Town of Walkerville and the eastern region.

1. Character and Heritage

Council is of the view that there is a need to not only maintain existing controls, but also potentially implement additional layers of protection to preserve the importance of township's character and historic nature.

A significant proportion of the Council area sits within the Historic Area Overlay under the Planning and Design Code – particularly within the suburbs of Medindie, Gilberton and, to a lesser extent, Walkerville. Council notes that while the Historic Area Overlay provides a degree of protection, it represents a relatively 'broad brush' approach which does not appropriately safeguard valued streetscape character and heritage.

Therefore Council strongly supports any future consideration of and/or policy initiative(s) which will assist with the further protection of both local and regional valued historic buildings and streetscapes.

2. Infill, Trees and Car Parking

Council notes that infill development has often resulted in a reduction of established vegetation within existing landscaped gardens as well as increased pressures on developments to remove Regulated and Significant Trees.

While Council notes and appreciates that attempts have been made to improve the design guidelines for infill development, Council strongly encourages the Commission to pursue a more holistic review of infill policy as it relates to:

- minimum site areas and frontages;
- impacts associated with increased traffic;
- loss of on-street parking;
- removal of street trees;
- · waste collection; and
- private open space.

Consideration should also be given the broader issues such as the provision of public open space within a walkable distance to households, and access to infrastructure and services such as public transport to ensure social equity.

Additionally, initiatives to increase the number of trees and tree canopy should also be linked to a strategic planning approach.

3. Storm Water Management

Consideration should be given to the improvement of storm water capture mechanisms and practices through water sensitive urban design to improve ground water infiltration and greening.

4. Urban Corridors & Fringe Interfaces

The Council also encourages the Commission to pursue a holistic review of the various zones along the arterial road corridors – including Main North Road and North East Road – to establish a policy approach that considers key planning elements such as land use mix, building height, interface with adjoining residential areas, traffic movements and the management of waste.

The Council notes that while the current zoning along arterial road corridors presently offers substantial development opportunities, there are many issues associated with this type of high-density development that need to be addressed carefully. It is also questioned whether sufficient facilities, services and infrastructure exist along some of these corridors to provide an appropriate level of amenity for future residents.

5. Town of Walkerville Urban Masterplan

Finally Council is of the view that the Town of Walkerville's Urban Master Plan firmly establishes Council's position in relation to a number of key matters and objectives sought to be considered by the Greater Adelaide Regional Plan. As such Council is committed to undertaking a review of the Urban Masterplan and providing the Commission with a revised document in early 2024, as part of Council's formal submission.

Council looks forward to working collaboratively with the Commission in the coming months on the further consultation and review process for the Greater Adelaide Regional Plan. In the meantime, should you have any further questions in relation to this submission, please contact Michael Walmesley (Manager Planning & Regulatory Services) on the above number.

Yours sincerely,

Andrew MacDonald
Chief Executive Officer

DTI:PlanSA Submissions

From: Glenn Searle

Sent: Monday, 27 November 2023 5:01 PM

To: DTI:PlanSA Submissions

Subject: West Torrens Council - Endorsed GARP discussion paper submission

Attachments: GARP Discussion Paper - WTCC submission.pdf; letter - GARP submission.pdf; GARP Discussion

Paper - Agenda Item.pdf

You don't often get email from

Learn why this is important

To whom it may concern:

Thank you for providing Council with an extension of time to allow for the submission to be considered by Council.

Please find attached a copy of the West Torrens Council GARP discussion paper submission that was endorsed at the Council meeting on 21 November 2023. Also attached is a cover letter outlining Councils position and a copy of the agenda report presented to the Council meeting of 21 November.

Regards,

Glenn Searle
Policy Planner
City Of West Torrens
165 Sir Donald Bradman Drive

.....

The content of this email is confidential and/or copyright and is solely for the intended recipient. If you have received this email in error: (i) you must not copy or distribute any part of it or otherwise disclose its contents to anyone; (ii) please let the City of West Torrens know by reply email to the sender and delete all copies from your system. No representation is made that this email is free of viruses or other defects. Virus scanning is recommended and is the responsibility of the recipient.



24 November 2023

Mr Craig Holden Chair State Planning Commission GPO Box 1815 ADELAIDE SA 5001

Dear Mr. Holden,

RE: Greater Adelaide Regional Plan Discussion Paper - Submission

Thank you for extending the deadline for submitting our response to the Discussion Paper. This extension was important as it enabled the Council to thoroughly review and endorse the submission at their meeting on 21 November 2023.

Our submission is structured into three key sections, addressing critical aspects of our vision for Adelaide's growth:

- How Adelaide should grow;
- · Where Adelaide should grow; and
- How/Where West Torrens can contribute to the development of Greater Adelaide, alongside the challenges inherent in this growth.

Council is dedicated to supporting a strategic, well-planned approach to housing development. We advocate for land releases that prioritise the creation of cohesive, well-functioning communities over a fragmented strategy that may fall short in providing the required necessary services.

Within our submission, we have referenced an array of strategic plans, documents, and research papers that have significantly informed our perspective. Should the Commission require access to any of these supporting materials for further consideration, we kindly request you to reach out to the Council. We would be pleased to provide these documents to aid in a comprehensive review.

Once again, we extend our appreciation for your flexibility in granting the extension. We look forward to constructive engagement and collaborative efforts in shaping the future growth and development of our community.

If you require additional information	or clarification,	please	contact	Gordon	Anderser	٦,
Manager Strategy and Business on						

Yours sincerely,



Celine Luya **General Manager Business and Community Services**

Attach: West Torrens City Council submission to GARP Discussion Paper. Council Agenda Item 21 November 2023



CITY OF WEST TORRENS RESPONSE TO THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER



Table of Contents

1.	Preface	3
2.	INTRODUCTION	4
3.	RESPONSE TO THE OUTCOMES FOR GREATER ADELAIDE	5
	A greener, wilder and climate resilient environment	5
	A more equitable and socially cohesive place	10
	A strong economy built on a smarter, cleaner, regenerative future	15
	A greater choice of housing in the right places	19
	Elements missing from the outcomes for Greater Adelaide	23
	Design and quality of space	23
	Transport (connectivity and movement)	24
	Living Locally	28
4.	Where should Adelaide Grow / Future land supply challenge (with specific focus on WTCC) 29
	Corridors	29
	Strategic Infill	34
	General Infill and Neighbourhood Regeneration	37
	Summary	48
5.	Other Matters for Consideration	50
	Employment Lands	50
	Adelaide Airport	50
	Open Space	52
	Climate Change	53
	Infrastructure	54
	Complying Code Amendments	55
	Multiple levers	55



1. Preface

The City of West Torrens is an inner metropolitan council, located between the city and the sea comprising approximately 37 square kilometres in area. About six per cent of the total land area within the city (approx. 173 hectares) is dedicated to public open space, including the River Torrens Linear Park, local and neighbourhood parks and other public open spaces such as ovals and sporting grounds.

West Torrens faces a range of complex residential/neighbourhood issues due to competing demands such as pressure for increased infill development while retaining the distinct identity of existing character and heritage suburbs and places. As well as the slow, uncoordinated and ad-hoc uptake of key strategic infill corridors such as Port Road (Thebarton) and Anzac Highway (multiple suburbs) which have not proceeded with the rapidity of other similar locations and has often involved an underdevelopment of these sites.

Despite these challenges it is worth noting that almost 45% of the housing stock is 3 bedroom dwellings, however a trend toward smaller, more dense and multi-storey development is occurring particularly in the Urban Corridor Zones. This trend is shown in the higher percentage of medium and high density dwellings within West Torrens (37% of all dwellings) compared to Greater Adelaide (26% of all dwellings) (Source: https://profile.id.com.au/west-torrens/dwellings). Residential and Commercial activity has traditionally been separated in West Torrens, however recent years has seen a trend toward mixed use development form.

The Council has the added benefit of being in proximity to the State's major domestic and international airport, and key transport corridors. Adelaide Airport Limited is a significant land holder within the city, taking up approximately 20 per cent of the total land area (approx. 771 hectares). A trend that was accelerated since the Covid19 pandemic has seen land within proximity to freight terminals and key transport corridors being utilised for freight, logistics and warehousing land uses which has somewhat buffered the decline of traditional large scale manufacturing in the last twenty years. Former Strategic Employment sites in close proximity to the Adelaide CBD, such as Thebarton and Torrensville are ripe for once in a generation evolution to incorporate well designed mixed use development.

The City of West Torrens is **committed to being the best place to live, work and enjoy life**, and envisages that any outcomes contained within the Greater Adelaide Regional Plan (GARP) will assist progress toward this vision.



2. INTRODUCTION

This response to the GARP discussion paper is divided into three main sections. **Section 3** of this report will directly respond to Part 1 of the Discussion Paper (How Adelaide Should Grow) and cover topics such as:

- The four outcomes for Greater Adelaide;
- The relation between the State Planning Policies (SPP's) and the Discussion Paper;
- Additional SPP's not considered in the Discussion Paper for each outcome; and
- The concept of "Living Locally".

As the four outcomes listed in the Discussion Paper closely align with the City of West Torrens key focus areas (contained within our Community Plan) reference will be made to Councils current and future projects, how these can achieve the implementation of the Discussion Paper outcomes as well as any current or future reports that Council can provide to the State Planning Commission (The Commission).

Section 4 will consider the question of "where Adelaide should grow" (Part 2 of the Discussion Paper) and provide commentary on the maps and investigation areas as well as Councils consideration of any additional areas for investigation.

Lastly, **Section 5** provides a summary of how West Torrens should grow as well as the future challenges that will need to be tackled.



3. RESPONSE TO THE OUTCOMES FOR GREATER ADELAIDE

A greener, wilder and climate resilient environment



Key Statistics

• 9.94% tree canopy cover greater than or equal to 3m in height for the City of West Torrens*.

*Preliminary figures from the *Urban tree canopy, green spaces and built environment analysis and reporting Technical Report* (2023)

- 173 hectares of public open spaces
- 190 raingardens
- Approximately 50,000 trees located within streets and parks
- 1,500 new trees planted each year
- The stormwater network comprises of approximately 165 km of stormwater pipes, associated stormwater infrastructure, open channels, pump stations and detention basins.

The West Torrens Council Community Plan 2030 states that our Focus for the Environment and Sustainability is:

"We protect and conserve the natural environment, reuse and recycle resources, support biodiversity and respond to climate change".

As the Community Plan 2030 highlights the City of West Torrens is dedicated to environmental stewardship and building the resilience to the impacts of climate change. This is demonstrated through Council's strategies and many environmental initiatives such as:

- Council's Climate Mitigation and Adaptation Strategy, including creating a green and cool City
- Rainwater tank and Raingarden rebate
- Urban heat and tree canopy mapping
- Partnership with AdaptWest
- Water Management Action Plan

- Significant and Regulated Tree Assistance rebate
- Tree Incentive rebate
- Urban River Torrens Recovery Program
- Native plant giveaway
- Council's Tree Strategy



The following projects are also being undertaken during the 2023/2024 financial year:

- Continue to partner with other councils and the Brown Hill Keswick Board to contribute to the Brown Hill Keswick Creek Flood Mitigation Scheme project.
- Upgrades to stormwater drainage systems in Kurralta Park, North Plympton/Plympton and other minor drainage systems to mitigate the risk of flooding.
- Undertake a 'Tree Canopy Target Modelling Study' to determine a canopy target and understand the resources required to meet that target.
- Undertake the staged upgrade of the Reece Jennings Bicycle Path as well as establish the Thebarton Riverbank shared pathway.

For the reasons listed above Council supports all efforts to moving Adelaide toward a greener, wilder and climate resistant environment.

Issues:

- The majority of trees located within the City of West Torrens are contained on private land
 and that is where significant tree loss is occurring. The loss of trees has implications for longterm health, economic prosperity, and resilience the community. Mitigating the loss of
 greening will require greening actions on both public and privately owned land. Greater
 protection of trees is needed, as well as increasing the amount of land dedicated for trees
 and other greening on private land.
- Council has a limited role in influencing green cover on private land but offers incentives to residents (rebates) to care for and plant new trees. Council has care and control of trees on land it owns and has planting programs to provide additional trees, such as along streets and in its parks.
- The following issues will be bolstered by the Expert Panel recommendations who have considered how the Code can retain trees as well as better integrate urban greening policies:
 - The ability to retain Regulated and Significant trees on sites, whether that be pre or post development (as well as at the land division stage) will be important to achieving tree canopy and urban heating targets.
 - o The ability to facilitate increased levels of greening in new developments.
- The equitable distribution and provision of public open space in suburbs that are experiencing increased residential densities.
- Councils need greater access to recycled treated wastewater such as from the GAP network, however issues such as poor pipeline water pressure will need to be addressed by SA Water before this can be utilised across Metropolitan Adelaide.



Additional information:

To assist the State Planning Commission the following Council documents can be utilised to inform the Draft of the GARP.

- Heat mapping and canopy cover information:
 - Western Adelaide Urban Heat Mapping Project August 2017
 - Western Adelaide Urban Heat Mapping Project (Final Summary Report)
 - o Open space for higher density structure plan (URPS) May 2019
 - AdaptWest Climate Change adaptation plan 2016 and in the process of drafting a forward action plan
 - o City of West Torrens Climate Mitigation and Adaption Strategy 2023-2027
 - o City of West Torrens Tree Strategy 2019-2025
 - o Council's website 'Analysis of Green Cover' study

Related State Planning Policies:

To assist fulfilling the four objectives of the GARP the following table provides commentary based upon the State Planning Policies in regards to what the planning system could do and ideas for the GARP.

Related SPPs	What could the planning system do	Ideas for the GARP
SPP 1 - Integrated Planning		 "Identify sites for strategic infill" "Identify new areas for renewal, as our major strategic brownfield sites become full" Council comment: We support this idea and we want to see the displacement and relocation of commercial and industrial land uses taken into account
		 "Capitalise growth in areas with existing open space networks in the CBD, along river corridors and near major urban parks" "Capitalise growth in areas well serviced by active travel networks, including designated cycle ways, such as the Mike Turtur and Amy Gillett bikeways" Council comment: Council is undertaking a staged upgrade of the Reece Jennings Bikeway. There is also untapped redevelopment potential due to current



	zoning alongside the Thebarton Shared
CDD 4	Pathway and the Westside bikeway.
SPP 4 -	"Identify new regional open space
Biodiversity	connections and biodiversity corridors"
	Council comment: Support and this needs to
	include the consideration for areas where
	dwelling and population densities have
	increased but the provision of open space is
	still low.
SPP 5 - Climate	 "Continue to map the tree canopy to
Change	identify urban greening priorities and
	establish new targets that are annually
	benchmarked and reported on"
	Council comment: Support - As we are
	currently partnering with the State
	Government to undertake this research.
	Council is also engaging a consultant to
	undertake a tree canopy target modelling
	study to determine a canopy target for West
	Torrens.
	"Identify future water needs to support
	growth and inform an Urban Water
	Strategy"
	Council comment: Support and as part of this
	initiative there needs to be further support
	for rainwater tanks on properties along with a
	greater integration/emphasis placed on
	WSUD requirements in the Code.
	"Explore options for introducing
	sustainability frameworks to master
	planned developments".
	Council comment: This needs to be included
	as part of the rezoning process as currently
	there is a disconnect in the system where
	land is proposed to be re-zoned but the
	current land owner does not intend to
	develop the land or to produce a master plan
	for the site.
SPP 14 - Water	
	"Collaborate with SA Water to identify a resilient future water network that
Security and	resilient future water network that
Quality	accommodates future growth"
	Council comment: As stated under SPP5 the
	provision of rainwater tanks and the greater
	integration/emphasis on WSUD principles in the Code is required.



It is recognised that water pressure can be an
issue within new developments and also
established areas that adjoin new
developments. This issue needs to be
thoroughly investigated and fixed to ensure
that the water network is resilient and can
accommodate the increased densities and
future growth that the Discussion Paper
envisages.

The Council notes the additional State Planning Policies that are relevant to fulfilling the aims of a "greener, wilder and climate resilient environment".

Related SPPs	What could the planning	Ideas for the GARP
incluted 5115	system do	lacas for the GAM
SPP 2 - Design	High quality green public	Objective 2.13
	spaces, places and	Provide a diverse range of high quality green
	streetscapes are also key	public open spaces and streetscapes,
	ingredients for creating liveable and healthy	particularly in areas of growth and renewal.
	neighbourhoods	Identify the areas where there is a lack of
		high quality green public spaces servicing
		areas of increasing population and provide
		funds to upgrade them.
		Seek additional mechanisms for the provision
		of new or expanded areas of open space in
		localities that are earmarked for infill.
		Council comment: The Commission needs to
		provide funds to map the current provision of
		open space across Greater Adelaide including
		the services (equipment, function and use) of
		those open spaces. This will assist to achieve
		the goals of the Living Locally concept.
SPP 15 - Natural	Encourage development that	Objective 15.4
Hazards	incorporates green	Mitigate the impact of extreme heat events
	infrastructure and water-	by designing public spaces and developments
	sensitive urban design to	to create cooler microclimates through the
	help mitigate the effects of hazards such as extreme	use of green infrastructure and water sensitive urban design
	heat and high rainfall storm	Council comment: Greater emphasis needs to
	events.	be placed upon urban design, green
		infrastructure in private developments to
		ensure that canopy cover and urban cooling
		occurs as currently too much reliance is
		placed upon street trees for urban cooling.



A more equitable and socially cohesive place



Key Statistics

- 31.7% of West Torrens residents were born overseas (higher than Greater Adelaide 27.6%)
- West Torrens has a multicultural population with a larger percentage of people with a Greek, Indian or Chinese ancestry than Greater Adelaide
- 30.3% of people live alone (higher than Greater Adelaide)

The West Torrens Council Community Plan 2030 states that our Focus for Community life is:

"We support diversity, health and well-being, community cohesion and connections, and create opportunities to learn and enjoy the local area"

Council is undertaking the following projects within the 2023/2024 financial year:

- Commence planning for the relocation of the Thebarton Community Centre.
- Manage the staged major redevelopment of Richmond Oval.
- Manage the staged redevelopment of Kesmond Reserve.
- Develop a Masterplan for a new lawn bowls facility at Lockleys Oval.
- Manage the staged major redevelopment of Frank Norton Reserve (Torrensville).

Expanding upon the City of West Torrens Open Space Strategy, a recent project has reviewed the distribution of the open space network to consider a strategic approach to increasing open space across the Council area. A key objective is to provide a park within 400m of homes in West Torrens. A gap analysis has revealed four main areas where more parks are needed to meet this goal. These maps can be found in **Appendix 1** attached to this report. It should be noted that this analysis does not take into account the size or quality of the public open space. Nor does this method of analysis subscribe to the walkable neighbourhood principle outlined in the 2017 update to the 30-year plan for Greater Adelaide which only considered open space with an area greater than 4000m².

In addition, it would also be useful to determine if the existing open space network is meeting the needs of the community, and the future community, such as the size of the park, its function, its services and equipment, etc. Such a study would be useful when considering additional Urban



Corridor Zones or neighbourhood and centre regeneration areas (further discussion on this point is contained in the **Section 5** - Open Space of this report). However, at this early stage it is clear that parts of Plympton, Richmond, Marleston, North Plympton, Lockleys, Underdale and Torrensville are under or poorly serviced by open space.

Issues:

- Affordability Additional costs to Local Government needs to be included in the calculation
 of development costs. This can include the cost for Local Government to be able to
 accommodate increased densities in existing suburbs:
 - Upgrade ageing stormwater systems to accommodate increased surface flows;
 - Either purchase new areas of open space or to provide upgrades to existing open space as the population and usage increases;
 - Provide new footpaths in locations where they haven't previously been provided/required; and
 - Increasing rubbish collection and associated costs with processing and disposal.
- As will be expanded in subsequent sections current access to high frequency public transport
 is extremely constrained within certain suburbs of the West Torrens Council area. Currently
 only the 167/168 bus provides "Go Zone" services to Keswick, Mile End South, Richmond,
 Marleston and Netley. If this bus were to be removed or otherwise inconvenienced people
 would either need to rely on slower services or be forced to use private vehicles.
- Have the public open space guidelines that were mentioned in the previous 30 year plan been developed?

Related State Planning Policies:

To assist fulfilling the four objectives of the GARP the following table provides commentary based upon the State Planning Policies in regards to what the planning system could do and ideas for the GARP.

Related SPPs	What could the planning	Ideas for the GARP
	system do	
SPP 1 - Integrated Planning		 "Concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure. Council comment: This needs to include costs to Local Government such as: footpaths, stormwater upgrades, local roads, street trees, etc. It is welcome to see open space is considered as part of SPP 2 as Councils will bear the costs to upgrade, provide greater



access or enlarge areas open space when areas are rezoned or increase in density. "Prioritise and stage the release of zoned land based on transparency of costs to the community of different forms of housing supply" **Council comment:** This needs to include costs to Local Government to provide services to the land and to the residents (including but not limited to: rubbish, footpaths, stormwater, trees, and parks). SPP 2 - Design Identify the need for high "Identify priority areas for investment in Quality quality open spaces, public open space and public realm realms, activity centres, and improvements" neighbourhood character. **Council comment:** Support - but how would **Council comment:** Support this be put into practice? Would the State Government capture data on the location, quality, size, function and nature of all open space in the Greater Adelaide Region? What about public realm improvements, would there be lists of when and where improvements have been undertaken or would this be a competitive process? There needs to be criteria developed and utilised to assess (and rectify) the underservicing of open space in infill areas. "Identify areas to investigate for additional heritage and character protections **Council comment:** Support - WTCC are currently progressing through a project to review our historic and character areas and to provide a new thematic history statement for the Council area. "More targeted approach to infill development to preserve neighbourhoods of major historic and cultural significance Council comment: Support. However, a review of the maps (figures 10 & 11) shows that many areas located within the Historic Area and Character Area Overlays are shown to be within corridor investigation areas.



		Allanda a dan alama antimitata la anta a a como
		Allowing development within heritage areas
		is not necessarily a bad option if it can be
		done in a way that is sympathetic to the
		heritage values and design of the area.
		 "Ensure urban greening policies are
		applied across all forms of housing
		supply.
		Council comment: Support
SPP 6 - Housing		"Identify strategic infill sites to provide
Supply and		more housing choices in areas near
Diversity		public transport, services and
Diversity		employment options"
		Council comment: Support and also there is a
		need to consider those uses that are
		displaced when land is rezoned (i.e.
0000		industrial/commercial land uses).
SPP 9 -	Identify employment lands	"Distribute sufficient employment lands
Employment	well serviced by public	to meet local demand for jobs and
Lands	transport, and which provide	reduce travel distances"
	an attractive place to work.	Council comment: This needs to consider
	Council comment: Support	existing employment zones that are
		experiencing pressure to be rezoned or
		pressure from nearby rezoned land
		"Identify areas for mixed-use
		developments that bring together
		housing, jobs and lifelong learning"
		Council comment: Support - More work
		needs to be done to understand market
		drivers for these sites and to encourage the
		market to take up existing land within the
		Urban Corridor Zone for these purposes (I.e.
		along the Port Road Corridor).

The Council notes the additional State Planning Policies that are relevant to fulfilling the aims of a "more equitable and socially cohesive place".

Related SPPs	What could the planning	Ideas for the GARP
	system do	
SPP 11 - Strategic		Objective 11.4
Transport		Minimise negative transport-related impacts
Infrastructure		on communities and the environment
		Objective 11.7



	Identify and protect the operations of key
	transport infrastructure, corridors and nodes
	(passenger and freight)
	Council comment: Maps contained in the
	GARP Discussion Paper do not consider
	Adelaide Airport, ANEF areas or Airport
	Building Height requirements. As such
	inappropriate residential development may
	be encouraged within proximity to the airport
	and negatively affect the lives of residents
	and the operation of the airport.
	Objective 11.11
	Encourage housing in metropolitan Adelaide
	in proximity to current and proposed fixed
	line (rail, tram, O-Bahn and high frequency
	bus routes
	01/10/10/10/10
	Objective 11.12
	Regional Plans (where appropriate) should
	identify performance targets for encouraging more development close to public transport.
	Council comment: While it is encouraging to
	see new mass rapid transit corridors
	investigation areas shown on the maps it is
	disappointing that there is no mention of a
	target for encouraging public transport usage
	or discussion regarding increased public
	transport services. Furthermore some of the
	corridor investigation areas and urban
	regeneration areas are shown in areas with
	poor public transport connectivity.
SPP 15 - Natural	Objective 15.4
Hazards	Mitigate the impact of extreme heat events
	by design public spaces and developments to
	create cooler microclimates through the use
	of green infrastructure and water sensitive
	urban design
	Council comment: To provide an equitable
	and liveable environment all suburbs
	(regardless of socioeconomic status) need the
	capacity to provide for streetscapes and
	public spaces that create cooler
	microclimates.



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



Key Statistics

- Gross Regional Product for West Torrens Council for 2017 is estimated at \$6.7 billion which represents 6.5% of South Australia's gross product.
- Adelaide Airport contributes approximately \$2.98 billon towards Gross State Product.
- 52,750 jobs in WTCC (2021)
- 27.2% of workers are in the retail and health care / social assistance sectors
- Employment lands: 111.74 hectares Employment Zone, 264.75 hectares Strategic Employment Zone and 37.57 hectares Urban Corridor (Business)

The West Torrens Council Community Plan 2030 states that our Focus for Prosperity is:

"We support jobs, businesses and industries to generate local economic growth and activity".

Council are undertaking the following projects within the 2023/2024 financial year:

- Develop a main street vision for the Henley Beach Road precinct. This project will completed by June 2024.
- Continue to partner with Adelaide Airport Ltd. In assisting to achieve the objectives of the Adelaide Airport Master Plan.
- Continue to participate in and work with partner Councils on the Building Western Adelaide Strategy to improve economic prosperity.
- Undertake a review into Employment Lands to consider their location, how they function and any help they may need to thrive into the future.

Issues:

• The Discussion paper states that:

"The planning system plays a critical role in supporting the ambitions of the South Australian Economic Statement 52 to deliver a smart, sustainable and inclusive future, by allocating enough



<u>land for current and future industries</u>. A prosperous economy requires us to have employment land that:

- Will accommodate our current and future industries
- Is appropriately serviced and connected to the world through digital infrastructure, roads, rail, ports and airports
- Is well connected to a skilled work force and environments that are attractive places for talented workers
- Is protected from incompatible development and balances competing uses appropriately".

Unfortunately for the City of West Torrens the Discussion Paper fails to highlight areas of existing employment lands, pays little attention to Adelaide Airport and encourages the rezoning of existing areas of employment lands to strategic infill. Recently the City of West Torrens has lost and will continue to lose land for employment uses to strategic infill and the Torrens to Darlington project. Estimates for this show that approximately 21% of currently zone employment lands will be lost to these processes in the future. For this reason we are requesting the Commission prepare an updated Employment Lands strategy as the last standalone employment/industrial land strategy prepared by the State Government was in 2007. These concerns are expanded up in **Section 5** - Employment Lands of the report.

The Discussion Paper appears to pay little attention to Adelaide Airport despite it being a major contributor to the State's economy and employment profile. The Adelaide Airport Master Plan 2019 sets out a vision for the growth of the airport, not just for flight numbers but also economic development through freight and logistics, employment lands and retail developments.

Adelaide Airport

	2018	2039
Passengers	8.5 million +	19.8 million +
Aircraft movements	106,075 total movements	168,500 total movements
Freight	58,500 tonnes	146,000 tonnes

Not all employment land needs to be located to the north of the city or at its outer edges (as shown in Figure 15 of the GARP Discussion Paper). Providing employment land within close proximity to the CBD, the airport and the north-south corridor makes economic sense as this consolidates land near a major freight terminal as well as major population centres (the Adelaide CBD) and the major freight arterial road.

Additional information:

To assist the State Planning Commission the following Council documents can be utilised to inform the Draft of the GARP.



- Employment Lands report (Property and Advisory PTY LTD April 2018)
- Building Western Adelaide Strategy 2021 2024
- Economic Development Plan 2020 2025

Related State Planning Policies:

To assist fulfilling the four objectives of the GARP the following table provides commentary based upon the State Planning Policies in regards to what the planning system could do and ideas for the GARP.

Related SPPs	What could the planning system do	Ideas for the GARP
SPP 1 - Integrated Planning	Identify employment land supported by strategic infrastructure. Council comment: Support. Council has recently lost areas of employment lands to other purposes (strategic infill and T2D). Identification of valuable employment lands is vital to ensuring that there are local jobs to our community.	"Identify and protect industrial land to provide employment to growing communities, including in key areas Council comment: All employment lands need to be reviewed, not just those near growing communities.
SPP 6 - Housing Supply and Diversity		 "Identify regeneration and strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth. Council comment: Consideration should be given to the next level of activity centre down (the District Centre) as these areas (such as Kurralta Park) have the potential to spur mixed use redevelopment at higher densities. This is especially important where those centres align with high frequency public transport.
SPP 9 - Employment Lands		"Protect and capitalise on employment land in the Inner Metro and Inner Southern regions for future knowledge based industries and innovation precincts" Council comment: Unsure how this statement aligns with the strategic infill areas shown on Figure 10. Those identified strategic infill areas currently fulfil an employment and



	industrial role within the City of West	
	Torrens. Furthermore Councils own	
	investigations (Employment lands	
	investigations 2018 show that many of those	
	areas still provide an important role.	
SPP 16 -	 Protect and capitalise on existing 	
Emissions and	employment land in Adelaide's west that	
Hazardous	is well separated from other land uses	
Activities	and strategically located along trade	
	gateways and freight corridors.	
	Council comment: Unsure how this	
	statement aligns with the strategic infill areas	
	shown on Figure 10. Those identified strategic	
	infill areas currently fulfil an employment and	
	industrial role within the City of West	
	Torrens.	



A greater choice of housing in the right places



Key Statistics

- 27,951 private dwellings
- In City of West Torrens, 36.9% of the dwellings were medium or high density, compared to 26% in Greater Adelaide

The West Torrens Council Community Plan 2030 states that our focus for the Built Environment is:

"We ensure housing, urban development and infrastructure contribute to attractive and safe neighbourhoods, and how we travel in and beyond our area".

Council are undertaking the following projects within the 2023/2024 financial year:

 Review of infill development; how it's been undertaken and delivered, its impacts on local communities and streetscapes and any areas for improvement

Issues:

As shown through the Point Data review the City of West Torrens has experienced growth in general infill development across all of our suburbs, with the majority located in three key areas: Kurralta Park, North Plympton and Plympton. Modelling provided by Point Data shows that this trend will only increase (above the historical baseline) over the next 1-15 years and will even continue (in certain suburbs) through to 30 years.

This growth in general infill has come about through planned re-zonings as well as the introduction of the Code. The transition to the Code allowed for an expanded choice of housing for numerous suburbs in WTCC with the former Policy Areas 20 & 21 being up-zoned to the General Neighbourhood Zone. This not only reduced the minimum allotment size from 420m² to a range from 300m² to 250m² but also increased the number of dwelling typologies allowed within the zone (from detached and semi-detached to all dwelling types) and can be seen in the table below.



The following information is applicable to Residential Low Policy Area 21

Land division comparison

	Residential Low Density 21		General Neighbourhood	
	Site area (m²)	Frontage (m)	Site area (m²)	Frontage (m)
Detached (>400 from centre zone)	420	12	300	9
Semi-detached (>400 from centre zone)	420	12	300	9
Group dwelling (>400 from centre zone)	Not envisaged	Not envisaged	300	15
Residential Flat Building (>400 from centre zone)	Not envisaged	Not envisaged	300	15
Row dwelling (>400 from centre zone)	Not envisaged	Not envisaged	250	7
Detached (<400 from centre zone)	350	9	300	9
Semi-detached (<400 from centre zone)	350	9	300	9
Group dwelling (<400 from centre zone)	Not envisaged	Not envisaged	300	15
Residential Flat Building (<400 from centre zone)	Not envisaged	Not envisaged	300	15
Row dwelling (<400 from centre zone)	350	9	250	7

Table 1: Comparison of allotment size; Development Plan policy and Planning and Design Code policy

The below provides an example of the type of infill that could be anticipated as a result of the changes introduced through the Code. However, it should be noted that the impacts, both positive and negative, of this increased general are yet to be reviewed to see if any improvements to the policy are required.



Image 1: Potential subdivision pattern allowed under the Code in the General Neighbourhood Zone



The topic of greater housing choice, general infill, strategic infill and corridor development will be expanded on in section 4 (Where should Adelaide Grow?).

Additional information:

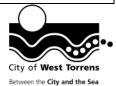
To assist the State Planning Commission the following Council documents can be utilised to inform the Draft of the GARP.

- Infill potential assessment (Point Data, September 2023).
- Stage 1 Heritage Review Thematic Heritage, Character Area Overlay and Historic Area Overlay Review (Grieve Gillett Architects and Jensen Plus).

Related State Planning Policies:

To assist fulfilling the four objectives of the GARP the following table provides commentary based upon the State Planning Policies in regards to what the planning system could do and ideas for the GARP.

Related SPPs	What could the planning system do	Ideas for the GARP	
SPP 1 - Integrated Planning		"Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing. Council comment: Additional costs to Local Government need to be included in the calculation of development costs. This can include the cost for Local Government to be able to accommend the increased densities.	
		 able to accommodate increased densities in existing suburbs: Upgrade ageing stormwater systems to accommodate increased surface flows; Either purchase new areas of open space or to provide upgrades to existing open space as the population and usage 	
		 increases; Provide new footpaths in locations where they haven't previously been provided/required; and Increasing rubbish collection and associated costs with processing and disposal. 	
SPP 2 - Design Quality		"Prioritise strategic infill sites that are generally more economic to service than general infill"	
		Council comment: There also needs to be a consideration of the current use and value	



	of the employment land as well as where
	the displaced businesses will be located and
	if they are required to be located within that
	neighbourhood or area.
SPP 6 - Housing	 "Investigate housing trends and
Supply and	preferences and new housing forms
Diversity	and models to deliver diverse housing"
	Council comment: Consideration also needs
	to be given to why certain sites and zones
	have not had development occur and what
	remedies or actions can be put in place to
	assist with the envisaged development. An
	example of this is Port Road adjacent
	Bonython Park which is zone Urban Corridor
	but has not seen any uplift in residential
	development.
	Set targets for each subregion to
	accommodate growth
	Council comment: Councils need to be
	directly involved with any targets set for
	their subregion or LGA. As the Point Data
	research shows West Torrens has general
	infill capacity for new dwellings between 15
	and 30 years without changing any planning
	policy. This is in addition to any strategic
	infill or corridor development which has not
	yet taken off.



Elements missing from the outcomes for Greater Adelaide

While the four outcomes are a good start when considering growth within the Greater Adelaide Region we believe that an additional two outcomes need to be added; namely Design and Transport. These two outcomes are of such importance to achieving the living locally concept and orderly design of Adelaide that they need to be explored further in the Draft GARP.

Design and quality of space

Design should be an integral part of the "Planning and Design Code" however it is often the part left missing or left to the end. In terms of design principles the GARP needs to consider how our buildings interact with their environment and the people that use them, the interconnectedness and layout of our open space and transport networks and how we plan for a changing climate. Leaving good design principles out of the GARP at best relegates the consideration of good design to a minor function of the assessment process (at best) and at worst to the whims of the market.

Furthermore, creating a Regional Plan and Development Assessment framework that prioritises the principles of good design will assist in delivering the living locally model as well as achieving the other four outcomes already listed in the plan.

As will be highlighted later in the report design requirements for infill developments need to be reviewed to ensure that:

- The outcomes being delivered meet the expectations of the community;
- The development achieves the Living Locally concept principles;
- Environmental, tree canopy and urban heat outcomes are maximised; and
- The development increases transport choices through the increased uptake of public transport and active transport modes.

Related State Planning Policies:

To assist fulfilling the four objectives of the GARP the following table provides commentary based upon the State Planning Policies in regards to what the planning system could do and ideas for the GARP.

Related SPPs	What could the planning	Ideas for the GARP
	system do	
SPP 1 - Integrated	Further embed the principles	Work with Local Government to map the
Planning	of good design in the Code.	location and quality of open space to ensure
	One way of achieving this is to	that areas of low open space provision have
	review examples of	adequate provision.
	developments approved	
	(under the Code) that are	
	located in various zones and	
	have gone through different	
	pathways.	



SPP 2 - Design Quality	Policy 2.13 Provide a diverse range of high quality green public open spaces and streetscapes, particularly in areas of growth and renewal.	Investigate the best way to target increasing the provision and access to open space for areas of increasing population growth.
	Policy 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 -	Policy 4.4 Enhance the	
Biodiversity	biodiversity of urban areas and townships through a connected and diverse network of green infrastructure systems along streetscapes, major watercourses, linear parks, open space, the coast and other strategic locations.	
SPP 6 - Housing Supply and Diversity	Policy 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.	Undertake mapping similar to those within the 2017 update to the 30 year plan showing the location of shops, public transport, open space, schools (i.e. those elements that make up the living locally concept). This will help to show where network upgrades or investments are required to facilitate development.

Transport (connectivity and movement)

Transport networks (whether they be road, rail, cycling or walking) are important to well-planned neighbourhoods, the concept of living locally and to functional cities.

While comparing Census data between 2016 and 2021 can be problematic, due to the Covid19 pandemic and how that affected society, it is still useful to see movement patterns and car usage across the city. The images below show the percentage of people who reported travelling to work by car in 2016 and in 2021.



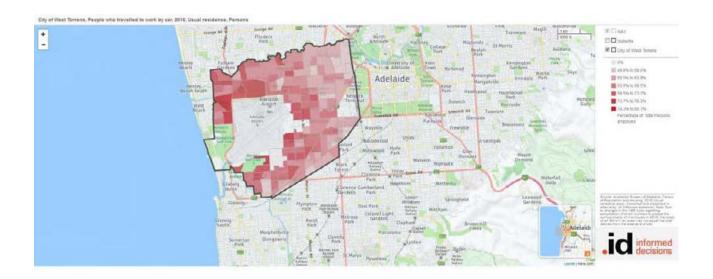


Image 2: 2016 Census, people who travelled to work by car (source: https://atlas.id.com.au/westtorrens)

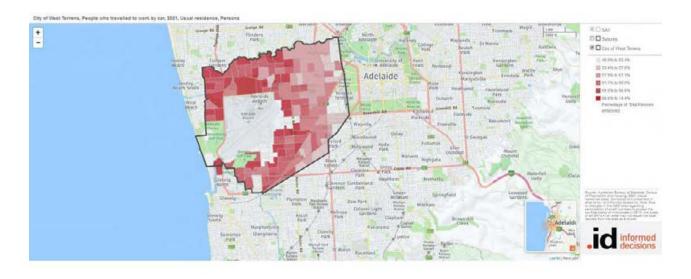


Image 3: 2021 Census, people who travelled to work by car (source: https://atlas.id.com.au/west-torrens)

Unsurprisingly those suburbs with the least reliable public transport connections (either poor services or no Go Zones) showed a higher percentage of car usage. Of note is the increase in car usage in 2021, this could either be caused by Covid19 and peoples reluctance to use public transport or it could be part of a broader trend. This is something that should be investigated in the GARP and in the recently released 20 Year State Infrastructure Strategy.



We welcome and support the Mass Rapid Transit Investigation Area shown on Figure 10 of the GARP and look forward to working with the Department for Infrastructure and Transport and the Department for Trade and Investment (PLUS) in the future on this corridor.

The previous 30 year plan for Greater Adelaide had a goal that 60% of all new housing in metropolitan Adelaide is built within close proximity to current and proposed fixed line (rail/tram/O-Bahn) and high frequency bus routes by 2045. Unfortunately for the City of West Torrens a number of our suburbs either don't have access to high frequency bus routes (Novar Gardens, West Beach and part of North Plympton) or are reliant on one Go Zone bus service (the 167/168 bus service - see the Go Zone map below). If that bus service is removed, re-routed or not functioning then those communities will need to find alternative methods of transport.

The GARP proposes to increase densities within these areas of poor or low public transport services by introducing new Corridor Zones, extending existing Corridor Zone or proposing increased densities through neighbourhood regeneration. Without planning for increased or new public transport services to support these new areas of infill (general or strategic) or corridor zones people will be forced to be evermore reliant on private motor vehicles to travel. This will create more traffic congestion, increased carbon emissions and a less healthy society. For this reason we recommend that transport networks whether they be public transport (buses, trams, trains), active transport (walking, cycling, scooter) be considered in the Draft GARP.

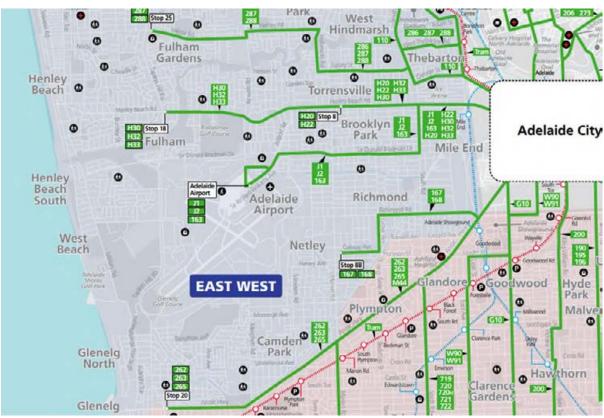


Image 4: Map of Go Zones as of 24 July 2023



Related State Planning Policies:

To assist fulfilling the four objectives of the GARP the following table provides commentary based upon the State Planning Policies in regards to what the planning system could do and ideas for the GARP.

Related SPPs	What could the planning	Ideas for the GARP	
	system do		
SPP 11: Strategic	Locating more housing options	Council comment: The GARP will need to	
Transport Infrastructure	and mixed use development close to public transport and	consider the following SPP objectives and how they can be achieved within the	
iiiiastiucture	active travel networks will encourage liveable urban	framework of the GARP.	
	spaces and support	Objective 11.2	
	rejuvenated neighbourhoods.	Development that maximises the use of current and planned investment in	
	The increased use of active transport can be achieved through a more compact	transport infrastructure, corridors, nodes and services.	
	urban form, mixed land uses	Objective 11.5	
	and increased population density, supported by alternative transport options. This will maximise our investment in public transport services and walking and cycling networks	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.	
	cycling networks	Objective 11.11 Encourage housing in metropolitan Adelaide in proximity to current and proposed fixed line (rail, tram, O-Bahn and high frequency bus routes.	
		Objective 11.12 Regional Plans (where appropriate) should identify performance targets for encouraging more development close to public transport. Council comment: The 2020/21 report card for the previous 30 year plan for Greater Adelaide provided a baseline (for 2020) of 47% of all new housing within Metropolitan Adelaide being built within close proximity to current and proposed fixed line and high frequency bus routes.	
		It would be beneficial for the Draft GARP to provide an updated baseline for 2023. Additionally with a greater focus towards	



	general and strategic infill the previous target (60%) should be reviewed and
	increased.

Living Locally

The living locally concept expands upon the walkable neighbourhood criteria which was first introduced in the previous 30 year plan for Greater Adelaide (2017 update). Council supports the concept of living locally as we see this concept will achieve the four outcomes listed in the Discussion Paper as well as the two additional outcomes that Council has requested.

However, to achieve these benefits we believe that a baseline level of measurable data needs to be captured along with targets that reinforce these goals/benefits. It is noted that the previously used walkable neighbourhoods criteria had targets to be achieved and was backed up by data and mapping so that properties needed to meet 3 out of 4 criteria to be considered walkable. These criteria were:

This target will incorporate the following criteria:

- Public open space (greater than 4000m² in size) (400m / 5 min walk)
- Primary schools (1km / 15 mins walk)
- Frequent bus services (including Go Zones) (400m / 5 min walk) OR
 Train station or tram/o-Bahn stop (800m / 10 min walk)
- Shops (800m / 10 mins walk)

On this basis Council requests that this level of mapping and data capture is introduced in the Draft GARP to enable authorities to better monitor and deliver communities and developments that meet the living locally concept.



4. Where should Adelaide Grow / Future land supply challenge (with specific focus on WTCC)

The Commission has described the future land supply challenge as one where:

Need 300,000 homes over the next 30 years

Current Have a supply for approximately 200,000 homes (0 - 15 year timeframe) **Future** Need to identify more land to accommodate 100,000 homes (16-30 year

timeframe)

To achieve this the Commission has considered residential growth in the following areas; Corridors, Strategic Infill, General Infill and Neighbourhood Regeneration.

Corridors

The City of West Torrens has three main locations of Urban Corridor Zone; Port Road (Thebarton), Anzac Highway (Keswick, Ashford, Glandore, Kurralta Park, and Plympton) and Henley Beach Road (Mile End, Torrensville, Brooklyn Park). An additional Urban Corridor Zone site is located at Marleston, however this site essentially forms an island as it is mainly adjacent to existing non-residential land uses (Employment Zone and Strategic Employment Zone).

Analysis of the Metropolitan Development Activity Tracker shows that since 2015 a total of 71 development applications have been lodged for residential development with a potential 654 dwellings. A breakdown of these applications across the three main Urban Corridor Zones shows that Anzac has received the most applications (57) and dwellings (474) with Henley Beach Road and Port Road lagging well behind (see tables 2 to 4).

Urban Corridor Zone: Anzac Highway

	Number of applications	Apartments	Storeys (avg.)
Approved	12	103	3.5
Commenced	13	97	2.8
Completed	28	236	3
Proposed	4	38	4.75
TOTAL	57	474	

Table 2: Development applications lodged for Anzac Highway (source: Development Activity Tracker)



Urban Corridor Zone: Henley Beach Road

	Number of applications	Apartments	Storeys (avg.)
Approved	11	108	2.9
Commenced	0	0	0
Completed	1	15	4
Proposed	1	47	5
TOTAL	13	170	

Table 3: Development applications lodged for Henley Beach Road (source: Development Activity Tracker)

Urban Corridor Zone: Port Road

	Number of applications	Apartments	Storeys (avg.)
Approved			
Commenced			
Completed			
Proposed	1	10	5
TOTAL	1	10	5

Table 4: Development applications lodged for Port Road (source: Development Activity Tracker SA Gov)

Despite the Port Road Urban Corridor Zone being initiated in 2013 only 1 application has been lodged for medium to high density dwellings in the subsequent 10 years. Similarly, Henley Beach Road has not seen a significant uptake for residential or mixed use development.

Given existing land use policy conditions applicable in the above mentioned corridors, there is considerable supply remaining within the existing corridor zones. What is not understood is the lack of uptake generally or of those developments approved, why they do not seek to maximise the zones full development potential.

Council welcomes the Commission's proposed review into the strengths and deficiencies of current urban corridor code policy and its undertaking into a commercial viability analysis to better understand the market conditions that are favourable to residential and mixed-use development on main roads.

The Council respectfully seeks to ensure that the investigation look at the uptake and utilisation of the zone, an analysis of the obstacles hindering development, and a comprehensive examination of the eventual development prospects for these corridors. The investigation will allow exploration of where corridor zones have been successful and why, providing valuable insights that can be applied



to the development and implementation of new and existing corridor zones in metropolitan Adelaide.

A primary objective of this investigation would be to pinpoint the limitations and potentials that can promote an augmented supply of housing options and diversity in these existing strategic locations and identify additional locations for rezoning to Urban Corridor at an appropriate time.

Council agrees with the following challenges captured in the discussion paper:

- Integration of higher-density corridor developments with adjacent established housing, land division patterns and allotment depths.
- Larger sites improve design outcomes, but fragmented ownership can impede site assembly
- Corridors adjacent historic and character areas need to be sensitively integrated into the surrounding urban form, and the design and interface carefully managed.
- Ensuring enough local employment land to service residents.

In addition to these, Council is of the view that corridor zones adjacent any neighbourhood zone needs to be sensitively integrated into the surrounding urban form, and the design and interface carefully managed. This includes reviewing how far back corridor zones encroach into existing neighbourhood zones.

Council supports growth in its existing corridor zones, but does agree investigation is required to better manage interface with neighbourhood zones (not only those that are within a historic or character area). Council has a very long-term view of looking at sequencing to extend successful corridor zones (e.g. manages interface with neighbourhood zones and delivered housing supply and diversity) with the express aim to preserve the distinctive urban character of West Torrens's and relieve pressure on its suburban streets.

The rezoning of extended or additional corridor zones within West Torrens as identified in the discussion paper is regarded as premature. This is grounded on the following rationale:

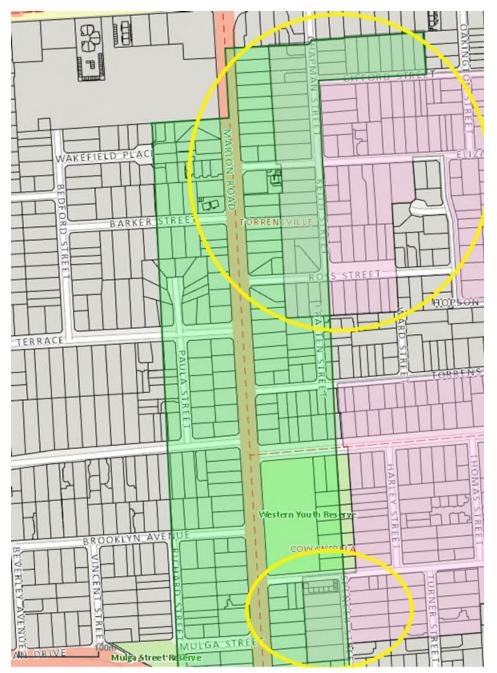
- 1. There is ample untapped capacity within existing corridor zones.
- 2. It runs contrary to the change management required for adapting to the evolving urban landscape of Adelaide.
- 3. Best practice delivery of strategic urban infill should prioritise the living locally principles.

Due to this concern, the Council is earnestly requesting the elimination of additional corridor zones from the final GARP. This request stems from the potential consequences and community distress resulting from haphazard and ad hoc developments of a scale and density as endorsed by the Code in Corridor Zones. Additionally introducing new or extended corridor zones may supress the uptake of existing corridors in the future.

In relation to the GARP Discussion Paper, Council raises strong objection to any encroachment of Corridor Investigation Areas (shown on maps in green) into existing Character Areas (shown on maps in pink) or Historic Areas (shown on maps in light blue). This is unfortunately seen in the following areas:



- The Marion Road Corridor Investigation Area at:
 - Chapman Street/Keith Street/Ross Street, Torrensville (Cowandilla / Mile End Character Area)
 - o Spencer Street, Torrensville (Cowandilla / Mile End Character Area)
 - o Gifford Street, Torrensville (Cowandilla / Mile End Character Area)



Map 1: showing the Marion Road Corridor Investigation Area



- The Sir Donald Bradman Drive Corridor Investigation Area at:
 - A line parallel to Sir Donald Bradman Drive intersecting Turner Street, Wilson Street, Blackburn Avenue, Goldfinch Avenue, Bagot Avenue, Attrill Avenue, Clarence Street, Halifax Street, Milner Road and Mallen Street (including the southern side of Formby Street) Mile End and Torrensville (Cowandilla / Mile End Character Area)
 - Francis Street, Spencer Street and Turner Street, Cowandilla (Cowandilla / Mile End Character Area)



Map 2: showing the Sir Donald Bradman Road Corridor Investigation Area

- The Henley Beach Road Corridor Investigation Area at:
 - o Junction Lane / Junction Street, Mile End (Mile End Historic Area)
 - Victoria Lane, Mile End (Mile End Historic Area)
 - Taylors Lane, Parker Street and School Lane, Mile End (Thebarton Character Area and Rose Street Historic Area)
 - Huntriss Street, Wainhouse Street, Northcote Street and Danby Street, Torrensville (Torrensville East Historic Area)



Map 3: showing a portion of the Henley Beach Road Corridor Investigation Area

- o Malurus Avenue and James Place, Lockleys (Lockleys Character Area)
- Henley Beach Road and Willingale Avenue, Lockleys (Lockleys Character Area)



Elston Street, Brooklyn Park (Elston Historic Area)



Map 4: showing a portion of the Henley Beach Road Corridor Investigation Area

These encroachments may simply be an artefact of how the investigation areas were depicted on the maps and not representative of the Commissions ultimate thoughts but it is requested that any future mapping not encroach on Historic or Character Areas within West Torrens.

The Commission should note that Council are heavily invested in the development of our corridors and the communities that live in and around them. For this reason Council have initiated a number of projects as detailed below.

- Council are currently undertaking heritage investigations for the City of West Torrens, which will likely be of interest when considering any spatial changes to future zoning.
- Council has a study planned but yet to be commenced looking at interface between Corridor Zones and Neighbourhood Zones with the aim to understand how this could be improved to mitigate conflict between the often very differing scales of development.
- Council has also commenced its Henley Beach Road Visioning project which will be a multi staged project that over the long term will seek to achieve a comprehensive renewal of the Henley Beach Road experience.

Strategic Infill

Strategic infill refers to housing developments that typically occur on large, repurposed sites at higher densities (sometimes referred to as 'brownfield sites'). The government's Land Supply Report currently defines strategic infill sites as those that result in a net housing increase of greater than 10 houses.



Developing larger strategic infill sites allows for a master planned approach which can better consider the potential for a mix of diverse housing, greening and open space, stormwater management and parking.

The Discussion Paper shows three areas of strategic infill to be investigated within West Torrens; the former West End Brewery site, the Thebarton Strategic Employment Zone and the Mile End South Strategic Employment/Employment Zone. The following identifies Council's review and position of the three sites to be reflected in the final GARP.

The Former West End Brewery

The West End Brewery site is a strategic location, and meets a number of the living locally principles contained within the discussion paper. It does require additional work to meet more of these principles, but it is undeniably a site suited for strategic infill. This is largely due to its locational advantage provided from being in West Torrens and located close to fixed line public transport networks and active travel connectivity.

Currently the former West End Brewery site is the subject of a Code Amendment and has been purchased by Renewal SA with the plan to create a mixed-use community catering for more than 1000 new homes. The successful development of the former West End Brewery site could serve as a catalyst for additional local investments along Port Road, leading to similar transformative and strategic developments.

Council looks forward to working alongside Renewal SA to facilitate the delivery of this site as a show case of the living locally concept to benefit of new and existing residents of West Torrens but to also showcase for well-planned strategic infill within Greater Adelaide.

Thebarton Strategic Employment Zone

The Thebarton Strategic Employment Zone currently houses a wide variety of employment land uses ranging from waste transfer depots and recycling centres, biomedical labs, State Government facilities including the derelict former Mines and Energy property and food processing. It is one of the oldest industrial areas in Adelaide. Previous analysis undertaken on Council's behalf by Property and Advisory into Council's employment lands identified a change towards commercial uses and encroachment of residential land uses in this location.

Council's Employment Lands Investigation Report prepared by Property and Advisory identified the following:

The Thebarton Industrial Precinct presents several opportunities for new directions, as it contains such a mix of uses and is closely connected to the Adelaide CBD via Port Road and the associated tram line. Its relative proximity to the new RAH also suggests that a renewed development effort in Thebarton's bio-sciences precinct is warranted. This latter precinct remains less-than-fully developed some 10 years after its establishment and unless there is a renewed 'push' it might be eclipsed by other locations in Metro Adelaide, such as Tonsley.



The dominant land use in the Thebarton Industrial Precinct is commercial, with residential and retail uses also present but with a relatively minor proportion of the precinct still classified as 'Industrial', noting also that a previous food industry cluster looks to have faded off. The past decade has seen a decrease in land coded 'Industrial', and a proportional increase in 'Commercial' and 'Residential' properties in this precinct.

The reasons for the above trends are clear. Thebarton is an inner suburb that affords access to the nearby CBD with complimentary commercial uses at a comparatively low price. Added to this, there is no compelling reason for industry to be located in such a well-regarded location, except for its history there.

Further supporting this location for future investigations into a site of strategic infill are the emerging developments to facilitate the north-south corridor within the location e.g. Torrensville Bowling Club, the proposed educational facility at Ann Nelson Drive and the proposed development of the former West End Brewery. The intensification of residential and sensitive land uses necessitates an urgent investigation into the future of this area to best manage the conflict between competing land uses to avoid issues as this area transitions.

Mile End South

The Mile End South Strategic/Employment Zone was formerly a location for large scale heavy manufacturing, this precinct has transitioned into a bulky goods locality, together with several modern large scale industrial land uses.

The past decade has seen a substantial decrease in industrial properties in the precinct, predominantly being replaced by new commercial development. Residential and retail have also increased, but off a low base. This process can be expected to continue as:

- commercial uses out-bid legacy industrial uses in Keswick; and
- the development of bulky goods land in Mile End South continues, fostering the development of complimentary commercial uses in the Richmond Road East precinct.

Employment Lands Investigations Report by Property and Advisory made the finding that:

"Mile End South is deeply entrenched as a zone of industry and bulky goods retail. There is no potential for residential development in this precinct"

Mile End South is on a long term trajectory away from heavy industry towards mixed bulky goods retailing and commercial uses. Active industrial uses remain in the precinct (as delineated by Employment Land Investigation Report prepared by Property and Advisory), with an overhang of very old manufacturing buildings in the south of the precinct. It is expected that this will be replaced by new industrial and commercial development over the next decade or so. Given the rise of freight, logistics and warehousing land uses since the Covid19 pandemic this land may be suitable for an increase in those land uses. Adequate land use direction from Council is already in place for this to occur and no particular recommendations arise from our analysis for additional measures.



The inclusion of this land for further investigation into strategic infill is not supported at this time and requested to be removed from mapping contained in the final GARP. Additional commentary regarding Employment Lands is contained in **Section 5** - Employment Lands.

General Infill and Neighbourhood Regeneration

Infill development is the single largest form of new housing in Greater Adelaide with a projected net annual increase of approximately 2,500 residential dwellings. It is estimated that residential infill represents over one-third of the total dwelling stock growth in metropolitan Adelaide each year.

The 30-Year Plan for Greater Adelaide (2017 Update) intends that 85 per cent of all new housing is to be built within the existing urban footprint. Targets for the next iteration of the GARP are not yet known, although presentations provided by the Commission and Department have indicated a 70/30 split.

A supportive policy framework provided within the 2017 update of *The 30 Year Plan for Greater Adelaide*, encouraged the reduction of an urban footprint and the provision of more housing diversity close to public transport options, supporting the steady increase in the importance of minor infill to the overall settlement pattern of metropolitan Adelaide and is set to continue for the foreseeable future.

General infill (or small scale infill) in the discussion papers seeks to divide existing allotments in to 2-4 smaller allotments. In West Torrens this is not uncommon to be more aligned to 1 allotment into 5 or 6 smaller allotments (as shown in the examples across the next few pages). For this reason, West Torrens response addresses neighbourhood regeneration and general infill together, with West Torrens seeing general infill at a scale where neighbourhoods are being regenerated beyond that anticipated from 'general infill'.



Keith Avenue, North Plympton (between Packard Street and Wyatt Street)



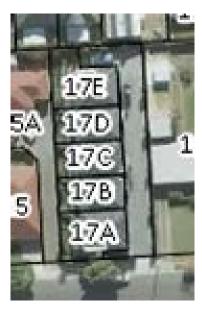


Image 5: - So far 32 homes have been built on what was 9 allotments (noting that 2 allotments have yet to be subdivided). 20 Keith Ave recently approved under the Code for 6 x two storey dwellings





Images 6 & 7 (above and below): On the other side of the road 17 Keith Ave there is a residential flat building containing 5 two storey dwellings.





Packard Street, North Plympton



Image 8: 5 x two storey row dwellings and removal of significant tree (Agonis flexuosa) with little room for new canopy cover.

3 and 5 Dudley Ave, North Plympton





Image 9: 3 and 5 Dudley Ave, North Plympton each with 6 dwellings approved with little room for urban greening outcomes (and noting the increased density in the surrounding area).

Richmond

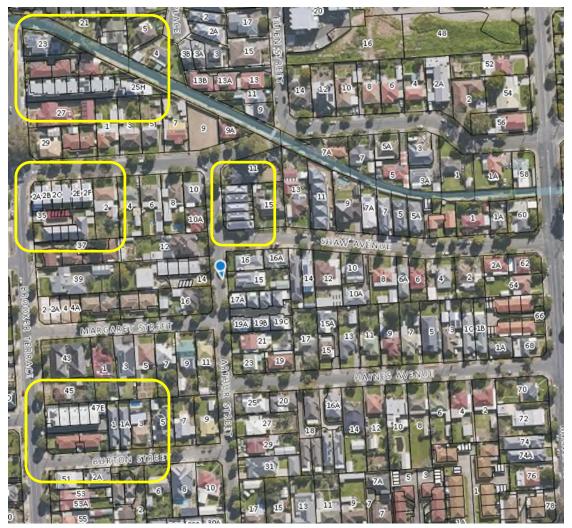


Image 10: Richmond locality - Brooker Terrace, Arthur Street and Burton Street





Image 11: Streetview 25 Brooker Terrace, Richmond



Image 12: Streetview 47 Brooker Terrace, Richmond



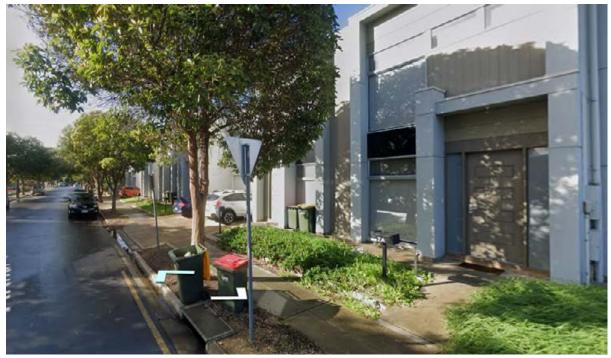


Image 13: Streetview 2 Arthur St, Richmond



Image 14: Streetview 13 Arthur St, Richmond

Phase 3 (metro Adelaide component) of the Planning and Design Code (Code) came into effect in March 2021. It sought to provide improved design outcomes to address poor development outcomes occurring through general infill. The issues evident included:

- Loss of existing neighbourhood character and integration within the existing streetscape,
- Poor quality dwellings,
- Loss of green cover and established tree canopy,



- Loss of open space,
- Bin storage,
- Loss of street car parking, lack of on-site parking and increased traffic,
- Increased hard surfaces,
- Increased urban heat, and
- Pressure on existing infrastructure.

For existing residents and new residents, the cumulative effects of these factors can be an imposition on their way of life. The negative effects are often felt at the very personal level of street or suburb. The effects are often very direct, and can be clearly associated with infill.

In the short term, infill may have limited positive impacts until certain thresholds within the community are reached to meet critical mass required for improved services. At this point amenity values are impacted and the effects escalate from the site or street level to a suburb or city wide issue as evidenced within locations contained in West Torrens causing a high degree of consternation and concern within the community.

The City of West Torrens has experienced high levels of infill development with the suburbs of Plympton, Kurralta Park and North Plympton receiving the bulk of this type of development. Council engaged the services of property data and analytics firm PointData to prepare an investigation into the infill potential for the City of West Torrens using the existing land use policy.

PointData identify that because a property can theoretically be subdivided (i.e. it meets planning policy), it does not mean that it will be subdivided. The investigation undertaken identifies market driven development potential for the City of West Torrens based on:

- Considerations of the land economics of development
- Historical development trends, and
- Property characteristics.

The investigation excludes development potential contained in areas identified as strategic infill (e.g. Pierson St, Lockleys, West End Brewery) or Urban Corridor Zones (e.g. Anzac Highway, Henley Beach Road or Port Road) as the predictive algorithm is currently not available. Key observations from the general infill investigation highlighted the following:

- Suburbs which have had higher infill rates continue to have higher rates based on the viable stock and favourable planning conditions, with 9 out of 26 suburbs to see an increase of +25% or more in years 1-5. This is a stark contrast to many other LGA's which are predicted to see a slight decline over the same time period due to difficult market conditions. This demonstrates the viability of the development stock in the City of West Torrens.
- After years 1-5, there is predicted to be a decline in uptake into the subsequent decade, with levels by years 11-15 slightly below those seen over the decade 2013-2022 (based on low viable stock scenario and not the high viable stock scenario). This decline is observed in 12 of the 26 suburbs, with the other 14 having sufficient viable stock to maintain historic uptake rates.



- The difference between "Low Viable Stock Scenario" and "High Viable Stock Scenario" in the City of West Torrens is not as pronounced as it is in many other LGA's.
- There is sufficient viable stock for general infill to continue to be a key vessel for increasing housing supply in the City of West Torrens, and it continues to be a desirable place to live and build. Planning for general infill continues to be an important consideration and the stock expected from general infill is an important part of the housing mix. A key variable that will have a significant impact on infill rates into the next 15 years is the perception of what constitutes a desirable character, with the City of West Torrens' subdividable dwelling stock dominated by mid-century builds.

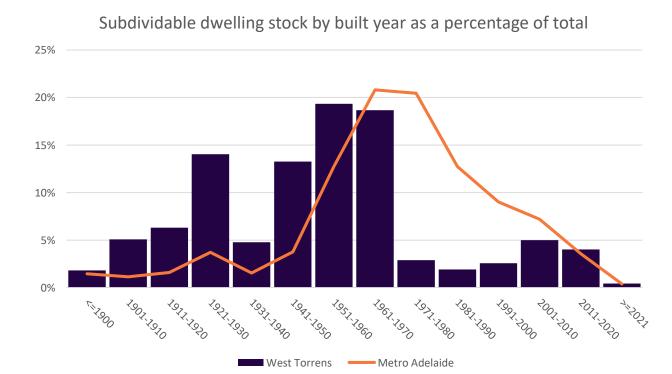


Image 15: Subdividable dwelling stock by year built within the City of West Torrens

The image above identifies that dwellings from 1921-1930 and 1941-1970 as being of viable stock for redevelopment based on year built, subdivisions potential and return on investment. This dwelling mix is also consistent with the demolition trends identified by PlanSA (shown below):



RECENT DEVELOPMENT TRENDS

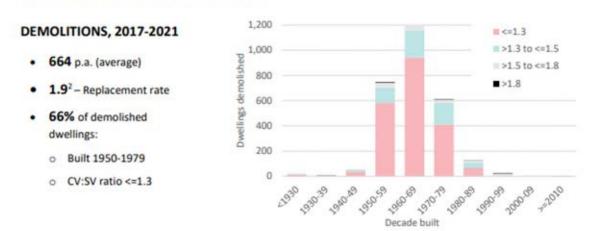


Image 16: Screenshot from Adelaide West Placemat

Likewise, PointData's investigations align with projected capacity numbers identified by PlanSA *PlanSA Urban Infill - Adelaide West* placemat and numbers identified in the GARP Discussion Paper investigations for 1-15 years. A point of difference is that the PointData investigation highlights that there is **capacity for infill beyond 15 years with no change to existing Code policy**.

To highlight this, Image 17 (below) of the attached PointData report identifies 8 suburbs (Brooklyn Park, Camden Park, Fulham, Lockleys, Netley, Plympton, Richmond and West Richmond) with significant viable stock for development beyond year 15. The number is 2343 additional dwellings under current conditions. The number is slightly higher when viewed across the council (2545 additional dwellings) as shown image 18, summary table.

					Market driven gain in dwellings per 5 year period							
		Total gain	in dwelings	Historical uptake rate	Low viable stock scenario				High viable stock scenario			
Suburb	SA2	Maximum theoretical gain in dwellings		5 year total (based on rolling average from 2013-2022)	Year 1-5	Year 6-10	Year 11-15	Total	Year 1-5	Year 6-10	Year 11-15	Total
Brooklyn Park	Lockleys	845	581	48	67	67	67	202	68	68	68	203
Camden Park	Plympton	593	458	46	76	76	76	229	77	77	77	232
Fulham	Fulham	642	541	46	58	58	58	175	58	58	58	175
Lockleys	Lockleys	615	399	67	84	84	84	252	85	85	85	254
Netley	Plympton	437	401	24	39	39	39	118	39	39	39	118
Plympton	Plympton	1920	1156	138	163	163	163	488	167	167	167	501
Richmond	Richmond	581	410	69	85	85	85	255	85	85	85	255
West Richmond	Richmond	231	208	23	24	24	24	72	24	24	24	72
Total		5864	4154	459	597	597	597	1790	604	604	604	1811

Image 17: Suburbs with uptake beyond year 15



Summary table

	Plistorical uptake					Market driven gam in dwellings per 5 year period							
			Total gain	Total gain in dwelings		Low viable stock scenario High viable stock scen					tock scenario	mario	
	Suburb	8/2	Maximum theoretical gain in dwellings	Total viable stock (gain in dwellings, high scenario)	5 year total (based on rolling average from 2013-2022)	Year 1-5	Year 6-10	Year 11-15	Total	Year 1-5	Year 6-10	Year 11-15	Total
В	Ashford	Plympton	114	22	24	19	0	0	19	20	0	0	20
<	Brooklyn Park	Lockleys	845	581	48	67	67	67	202	68	68	68	203
^	Camden Park	Plympton	593	458	46	76	76	76	229	77	77	77	232
=	Cowandilla	Richmond	218	52	13	16	16	6	38	16	16	16	47
2	Fulham	Fulham	642	541	46	58	58	58	175	58	58	58	175
	Glandore	Plympton	5	0	6	5	- 6	6	16	5	6	6	17
hurb	Glenelg North	Plympton	6	3	8	8	8	8	23	8	8	9	25
	Hilton	Richmond	126	11	8	8	3	0	11	8	3	0	11
	Keswick	Plympton	401	89	13	12	12	12	37	13	13	13	39
	Kurralta Park	Plympton	730	380	120	137	137	63	337	139	139	102	380
	Lockleys	Lockleys	615	399	67	84	84	84	252	85	85	85	254
	Marleston	Plympton	247	151	45	57	57	12	126	60	60	32	151
	Mile End	Richmond	712	28	52	25	3	0	28	25	3	0	28
	Netley	Plympton	437	401	24	39	39	39	118	39	39	39	118
	North Plympton	Plympton	625	494	112	144	144	127	415	149	149	149	448
	Novar Gardens	Plympton	172	102	9	26	26	28	80	26	26	29	80
	Plympton	Plympton	1920	1156	138	163	163	163	488	167	167	167	501
	Richmond	Richmond	581	410	69	85	85	85	255	85	85	85	255
	Thebarton	Richmond	179	10	10	0	0	0	0	0	0	0	0
	Torrensville	Richmond	691	81	39	62	15	1	78	63	17	1	81
	Underdale	Lockleys	511	187	26	30	30	30	91	31	31	31	92
	West Beach	West Beach	55	49	11	12	12	13	37	12	12	13	38
	West Richmond	Richmond	231	208	23	24	24	24	72	24	24	24	72
	Total		10656	5813	951	1156	1066	903	3125	1177	1087	1004	3268
D		Fulham	642	541	46	58	58	58	175	58	58	58	175
2		Lockieys	1971	1167	141	182	182	182	545	183	183	183	550
0		Plympton	5250	3256	542	685	667	534	1887	703	685	623	2011
•		Richmond	2738	800	212	220	146	116	482	221	148	126	495
5		West Beach	55	49	11	12	12	13	37	12	12	13	38
	Total	2 5	10656	5813	951	1156	1066	903	3125	1177	1087	1004	3268

Image 18: Summary table

In summary, the PointData report advises:

- The City of West Torrens will see a slight increase in general infill rates in the next 5 years, before a gradual decline in the following decade, but this will still see infill development above historic levels.
- This is in contrast to adjoining/comparable LGA's of Charles Sturt, Marion and Holdfast Bay which will all see a slight decline in the next 5 years, before returning to close-to-historic rates and sustaining for the following decade.
- Also in contrast is the rest of Metropolitan Adelaide, which will likely see historic rates sustained in the short-term before accelerating modestly in the following decade.
- The key driver behind West Torrens' reduction is the age of dwelling stock available, with the majority being ripe for development now.
- A key factor which will affect future rates of general infill will be the desirability of 1950 1970s built homes, and whether or not they become desirable to retain for their character.

On this basis, no change is required to zones across West Torrens with supply evident beyond year 15 for general infill, which is acting as a catalyst for regeneration of neighbourhoods within West Torrens. Based on this investigation it is sought that the next iteration of the GARP does not identify further investigations into neighbourhood regeneration. Council has commenced its own investigations into general infill.



Council does not support additional policy alterations aimed at augmenting general infill or neighbourhood regeneration. Council has undertaken investigations and advises that there is a sufficient supply for this form of development, and land supply for beyond 15 years. This is also on the basis that the capacity assessment as shown in tables 17 and 18 does not take into account strategic infill (Urban Corridor Zones, substantial parcels e.g. 25 Pierson St, Lockleys, the Brewery site and other locations along Port Rd).

Furthermore, and as highlighted by the infill examples, design requirements for infill developments need to be reviewed to ensure that:

- The outcomes being delivered meet the expectations of the community;
- The development achieves the Living Locally concept principles;
- Environmental, tree canopy and urban heat outcomes are maximised; and
- The development increases transport choices through the increased uptake of public transport and active transport modes.

Summary

To provide a quick summary of the above information and analysis the following table outlines areas/locations that Council currently support for redevelopment and/or urban infill, areas that require more investigation, areas to be excluded and areas that are currently working. In the right hand column of the table there are also investigations that we believe are required to allow for the efficient development of the areas.

	Locations / Sites / Suburbs	Investigations required
Support	Adelaide University (Thebarton)	Site contamination Interface
	Port Road (Corridor Zone)	Catalyst/kick start for
	Anzac Highway (Corridor Zone)	Port Rd Transport
	Brewery Site	Urban greeningOpen space distribution and usage
Needs investigations required / already being undertaken	North side Henley Beach Road (between South Road and Holbrooks Road)	 Site contamination Interface Catalyst/kick start for Port Rd
	- 1 1 1 (0) 1	• Transport
	Thebarton (Strategic Employment Zone)	Urban greeningOpen space distribution and usage



	Future living Code Amendment (how could it be included in CWT) Pierson Street, Lockleys	 Impact on Employment lands Building heights Impact on Character/Historic Areas Stormwater disposal
Areas not previously considered by Council and to be	Keswick	Given the lack of investigations undertaken into these areas Council would recommend that
excluded until further	Ashford	these areas be excluded until thorough investigations are
investigations	Mile End South (Strategic Employment Zone)	completed. This is not discounting these areas, instead they are seen as areas that due to the lack of investigations, their current functions and development and the existing site conditions can be considered in the 15-30 year time period.
Areas to exclude	Airport layers (ANEF, OLS Building heights)	This information needs to be mapped in the GARP (and added to Figure 6 - or at least the discussion)
Areas/Zones that are currently working	General infill suburbs such as Kurralta Park, North Plympton, Plympton, Brooklyn Park.	However a review of infill policy to ensure that new dwellings meet community expectations, design standards, greening, transport goals, etc. is required.

As can be from the previous Section and the table above Council supports the provision of greater housing choice in well considered land releases as opposed to a piecemeal, fragmented approach which does not provide for the services required by well-functioning communities.

To provide a greater level of understanding for the community the maps contained within the GARP could breakdown areas for new housing (corridors, strategic infill and regenerated neighbourhoods and activity centres) into pipeline of land and investigations over 5 year periods.



5. Other Matters for Consideration

Employment Lands

Regeneration of Industrial Sites

The regeneration of former industrial sites at the end of their productive life offers opportunities to create new mixed-use walkable communities, however there is a need to ensure enough local employment land is retained to service residents and employment growth.

When looking at rezonings across the City of West Torrens since the implementation of the new planning system there has been an alarming trend to rezone employment land to neighbourhood zones. These Code Amendments have included:

- 65-73 Mooringe Ave, Plympton Code Amendment, finalised with 1.2 Ha rezoned from Strategic Employment Zone to Housing Diversity Neighbourhood Zone.
- 107 Port Road Thebarton (Thebarton Brewery Precinct) Code Amendment, consultation completed, 8.4Ha of primarily Strategic Employment Zone to Urban Corridor (Boulevard) Zone.
- 25 Pierson Street, Lockleys Code Amendment, which has been initiated and seeks to rezone 4.8Ha of Employment Zone to a neighbourhood zone type.

Likewise, the North-South Corridor will further impact on approximately 15.6 hectares of employment land uses within West Torrens.

Council has some early thoughts of locations for alternate strategic infill sites, however given 77.42Ha* of employment lands are currently under review for rezoning to neighbourhood zone type or infrastructure (*T2D plus current re-zonings plus strategic infill shown in the Discussion Paper). This represents approximately 29% of all land zoned Strategic Employment or Employment within the City of West Torrens (excluding the airport). Therefore, It is requested that prior to further rezonings from employment land to other zones occurs that an investigation be undertaken to determine the amount, use and spread needed for employment lands within West Torrens at a strategic category to best maximise employment land supply and distribution.

Adelaide Airport

The discussion paper acknowledges that land around Adelaide Airport, and the South Road corridor will see increases in new commercial enterprise. This highlights the importance of trade gateways and freight corridors to drive new employment growth, all of this is evident to West Torrens.

Adelaide Airport is singularly the most important of all employment land precincts in West Torrens. Future development in accordance with its masterplan is integral to the employment future of West Torrens.

The GARP Discussion Paper identifies on page 103 that we must safeguard airports. However, there was no further discussion on how this may occur. Critical to the development of the final GARP is consideration of the conflict between existing (and future) residential development and the growing airport. As a key neighbour, local government service provider, customer, stakeholder (and now



lessee) of the Adelaide Airport, Council has long maintained an interest in the future plans for development of Adelaide Airport. To this end, Council has a keen interest in better integration between the Commonwealth legislation under which airport development is assessed and the State planning laws which determine land uses in surrounding areas.

The prominence of the Adelaide Airport Precinct as a major economic and employment generator in the State continues to grow, and as such, the flow on impacts to the surrounding land uses become increasingly complex to manage. The benefit of having a major capital city airport so convenient to the city, as is the case in Adelaide, requires all potential impacts to be carefully balanced in order to 'future proof' the airport's location.

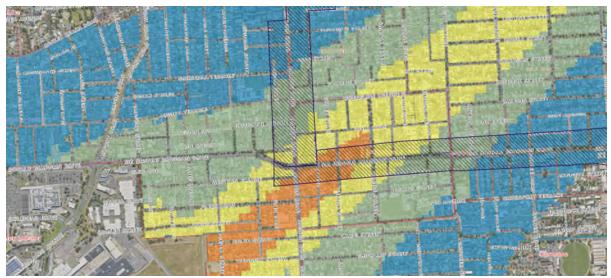
As the City of West Torrens is committed to being the best place to live, work and enjoy life, recognising the important role that the Adelaide Airport has to play as the State's premium tourism and emergency services infrastructure and as a key precinct for employment, also requires a balanced approach to accommodating community expectations of liveability in residential areas affected by the airport's air transport movements.

As a key voice for the community in City of West Torrens, Council has a role to play in advocating to the Adelaide Airport to consider minimising and/or ameliorating the impact of airport operations and aircraft movements on nearby sensitive land uses. Council sees its position is to leverage this role as a partner working in cooperation with Adelaide Airport, State Government and the Commonwealth Government to consider, and reduce, the impact Airport operations on surrounding residents and non-Airport land uses, and where possible reducing the opportunity for incompatible development in surrounding areas.

A key opportunity was missed to future proof the airport's location by planning for intended land uses around the airport that reduce the opportunity for additional dwellings and other sensitive development in Public Safety Areas when the Commission and DIT implemented the current planning system.

The State Planning Commission and DIT are currently undertaking investigations into the preparation of a new 30 year plan (GARP), with a general goal of increasing residential densities. Additional residential development in close proximity to the Adelaide Airport (as with any airport) could end up stifling the growth capacity of the Airport, and increase noise complaints from residents. The Corridor Investigation Areas for Marion Road and Sir Donald Bradman Road are located within the ANEF 35 and 30 areas as shown on the map below. Currently the Code seeks to reduce development sensitive to aircraft noise is designed and located to manage noise intrusion to reduce land use conflict and protect human health.





Map 5: ANEF 35 in orange, ANEF 30 in yellow and the Corridor Investigation Areas hatched purple).

The National Airports Safeguarding Framework (NASF) Guidelines, if properly implemented, would be particularly effective in future-proofing the location of the airport by promoting awareness and ensuring incompatible development is not encouraged or intensified in proximity to Adelaide Airport. Council's role in addressing the NASF guidelines is currently somewhat hampered by the South Australian Government's lack of uptake of the NASF Guidelines and implementation into the current Planning system.

It is requested that the Commission and DIT seek to align State and Commonwealth planning practices to better protect the airport and mitigate incompatible/sensitive land uses for the benefit of human health.

Open Space

The City of West Torrens is positioned to experience considerable population growth, concentrated around key transport corridors and identified higher density nodes. Accompanying the changes in built form will be a shift in how the community engage with and utilise open space and public places. It is vital that development of this nature be accompanied by appropriate open spaces and public places to support community life and encourage health and wellbeing. The equitable distribution of quality and useable public open space which is both accessible and of adequate size to accommodate the increasing population, recognising the correlation between an increase in density and increase in demand for public open space and public places.

Council engaged URPS to undertake investigations into open space for higher densities (2019) which explored alternative approaches to the provision of public open space provided as part of a development from the traditional land allocation of 12.5% or monetary contribution.

The investigation set out to establish benchmark minimums in the provision and distribution of public open space, reviewing alternative approaches used interstate and overseas. These approaches seek to link the provision of open space to the number of people within an area which



therefore enables greater levels of public open space to be provided where population density is highest. The following was found:

A best practice standard of 3 hectares per 1000 people was nominated as the basis for future public open space provision within the City which when analysed indicates that there is a general undersupply of open space. With respect to distribution, the plan recognises contemporary approaches which support open space provision within 400 metres of residents and playground with 250 metres.

While achieving a good level of open space provision within high density developments is important, the principles that guide open space planning should also include a wider range of considerations for the delivery of open space including quality of open space, usability, diversity of activities or types of open space, equity of access, efficient resource management, stormwater harvesting, climate adaptation, and green infrastructure.

In analysing the distribution of open across the City, significant gaps were identified in both the area provided and the location of open space. Of particular importance were the deficiencies identified in and around areas zoned Urban Corridor Zone and those Residential Policy Areas supporting increased density. When considering the proposed approach to open space provision, an additional 52 hectares would be required to meet the population targets set in the 30 Year Plan for Greater Adelaide.

Council seeks greater consideration to active implement open space at a rate commensurate to the population growth expected.

Climate Change

The choices we make today regarding the future design and structure of Adelaide carry long-term consequences that can affect operations for decades. These decisions have the potential to actively enhance our ability to withstand and adapt to climate change, or, conversely, embed social and economic vulnerabilities into the urban system.

GARP offers an opportunity to understand and address land use planning mechanisms and the broader risk landscape posed by climate change. In doing so, it can help reduce the vulnerability of our population while creating a city with a robust, resilient, and diverse ecological environment. This resilience will be essential as Adelaide undergoes a fundamental shift from a Mediterranean climate to a semi-arid one, allowing us to better buffer the impacts of this change.

It is essential to gain a comprehensive understanding of the critical regional climate thresholds and explore adaptation strategies as an integral part of the region's development and embed this into the Regional Plan. This proactive approach is vital for mitigating risks associated with compounding impacts that could potentially erode the social, economic, and ecological resilience of the region. Land use planning plays a pivotal role in achieving this objective, with regulatory tools serving as a means to enhance resilience in our urban environment.

The Western Adelaide Region is already experiencing extreme and hazardous climatic events such as flooding from intense rainfall, sea level rise and storm surge as well as extreme temperatures and heatwaves. Recent storm events have resulted in interruptions to our electricity supply and key transport routes, damage to built infrastructure such as jetties and coastal paths and erosion of our



beaches and dunes. Extreme temperatures and extended heatwaves have resulted in increased hospital admissions and heat related illnesses and deaths.

With continued changes in climate projected into the future, the intensity and frequency of extreme events will also increase. Without intervention, the Western Adelaide Region will not only continue to flood and experience extreme heat, but this will occur more often and the impacts will be more severe.

Council identifies the AdaptWest Plan (<u>adaptwest-climatechange.pdf</u>), AdaptWest is about making sure that the communities, environment and businesses and industries of the Western Adelaide Region remain productive, connected and strong and can respond positively to the challenges and opportunities presented by a changing climate.

Council seeks that the Commission and DIT embed climate adaption within the GARP.

Infrastructure

Under the Infrastructure SA Act 2018 (SA) (the Act) Infrastructure SA must prepare a 20-Year State Infrastructure Strategy (the Strategy) and review it at least once every 5 years.

The first Strategy was released in 2020 and has been instrumental in guiding decision making and investment decisions for infrastructure since its publication. Infrastructure SA is preparing the next 20-Year State Infrastructure Strategy and consultation closed on 13 November 2023.

The new strategy will look at state-wide infrastructure needs to 2045, with a focus on infrastructure planning and investments that drive a growing economy aligned to the State's economic vision of a smart, sustainable and inclusive economy. Not to lose sight of the current 20 Year State Infrastructure Strategy, the following is key:

An integrated approach to planning is critical to avoid unintended consequences and maximise benefits. Planning for population growth through integrated land use, infrastructure and service planning ensures that services can be efficiently delivered and communities are great places to live and work in. Prioritising space for social infrastructure such as schools, hospitals and affordable housing is key, and government can play a role in bringing together stakeholders to fully understand needs and impacts. When planning social infrastructure and supporting services, an integrated, person-centric approach is needed.

The current Greater Adelaide Plan recognises the importance of this integration, as does State Planning Policy 1: Integrated Planning. Efforts to improve integration of land use and infrastructure planning as well as the services necessary to support the population should continue, as this can provide the framework for efficient development that encourages economic growth and builds stronger, more cohesive and resilient communities.



With both the GARP Discussion Paper and South Australia's State Infrastructure Strategy Discussion Paper being consulted and prepared concurrently a unique opportunity exists to provide greater synergy for integrated planning to occur.

Complying Code Amendments

Complying Changes to the Code (s75 of *the Planning, Development and Infrastructure Act 2016*) are undertaken through a fast-track process that allows for zone, sub-zone or overlay boundary changes to the Code that are consistent with a clear recommendation in a Regional Plan.

For this to occur, the proposed changes to the Code must be clearly and expressly identified in the Regional Plan, through the use of specific maps or information about the changes proposed to the Code.

Consultation on Complying Changes to the Code is required, and this must comply with the Community Engagement Charter. It is possible for a Complying Change to the Code and an amendment to a Regional Plan to be consulted on and approved at the same time.

The Minister may make a decision on a Complying Change after receiving advice from the Commission. A Complying Change to the Code will take effect from the date specified in an instrument published on the SA planning portal.

There is no requirement to refer Complying Changes to the ERDC.

The Council respectfully requests that areas earmarked for investigation with regards to infill be explicitly designated as not meeting the criteria for complying Code Amendment. This recommendation stems from the insufficient investigations conducted to ascertain their suitability for such purposes and the lack of community consultation identifying that this could occur as a result of GARP.

Multiple levers

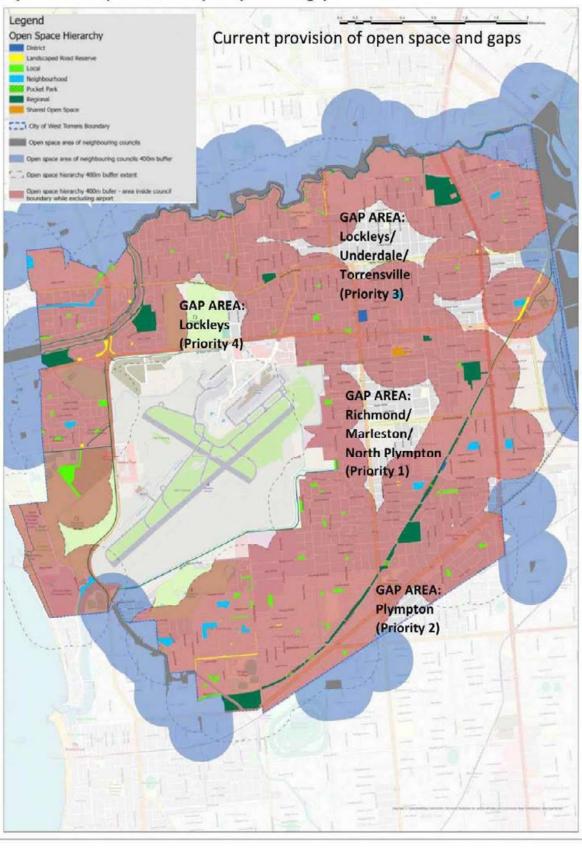
It is critical that South Australia's land use planning system works with other policy levers to facilitate and support population growth, respond to community aspirations and enable the delivery of necessary services and infrastructure to the locations where they are needed most.



APPENDIX 1



Map 1 - Current provision of open space and gaps



16.7 Council Response to the Greater Adelaide Regional Plan Discussion Paper Brief

This report presents feedback on the Greater Adelaide Regional Plan Discussion Paper that has been on community consultation.

RECOMMENDATION

It is recommended to Council that:

- The response to the Greater Adelaide Regional Plan Discussion Paper be endorsed and submitted to the State Planning Commission.
- The Chief Executive Officer be delegated authority to make minor changes of a technical nature if required as approved by Council.

Introduction

As part of the five yearly review of the 30 Year Plan for Greater Adelaide (2017) the State Planning Commission (the Commission) has prepared a discussion paper to inform a new Regional Plan, known as the Greater Adelaide Regional Plan (GARP). A copy of the discussion paper can be found under separate cover.

Pursuant to the Planning, Development and Infrastructure Act 2016 (PDI Act), Regional Plans:

- are prepared by the State Planning Commission;
- undergo formal public consultation in accordance with the Community Engagement Charter;
- must be approved by the Minister for Planning;
- define the South Australian Government's long-term vision for growth, integration of land use, transport and the public realm and the application of State Planning Policies in the region;
- may include recommendations about the application of the Planning and Design Code (Code) in the region, and define actions including complying Code amendments;
- may also recommend specific amendments to the Code, with an option for the Minister to
 make or initiate a change to the Code involving a boundary change to a zone or subzone
 and/or the application of an overlay, on approval of a regional plan without further process.

The Discussion Paper was released on 14 August 2023 for public consultation with the due date for submissions being 6 November 2023. During the consultation period events for the public were held along with a workshop with Council planning staff on 7 September 2023, while a briefing on the Discussion Paper for Elected Members was held on 19 September 2023.

To facilitate deadline for submissions the Commission allowed a draft, embargoed version of the Councils submission to be provided in advance of a Council meeting with an endorsed submission coming after the November Council meeting.

The Discussion Paper is intended to act as a 'conversation starter', with consultation on the draft Revised Regional Plan for Greater Adelaide anticipated to be released in 2024. The Discussion Paper is divided into two core questions:

- How should Greater Adelaide grow?
- Where should Greater Adelaide grow?

In looking at these questions the Discussion Paper attempts to identify growth over a 15 to 30-year period by considering:

- What major infrastructure is needed and how it will be provided;
- How housing and population will be serviced;
- Where houses and employment land will go;
- Which areas need conservation and protection.

Discussion

The Council response to the GARP Discussion Paper (Attachment 1 - under separate cover) interrogates the two core questions and more specifically:

- The four outcomes for Greater Adelaide
- Missing elements from the outcomes
- Future land supply (corridors, strategic infill and general infill)
- Employment lands.

This Council report provides an overview of the recommended response as submitted in the embargoed copy and is replicated in (Attachment 1 - under separate cover).

Four outcomes:

The four outcomes listed in the Discussion Paper (below) closely align with the City of West Torrens key focus areas (contained within the Community Plan). For this reason, Council are well on the way to achieving these outcomes through the delivery of current and future projects as well as existing programs.

Outcomes for Greater Adelaide

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

The four outcomes are a good start when considering growth within the Greater Adelaide Region but it is considered that an additional two outcomes need to be added; namely Design and Transport. These two outcomes are of such importance to achieving the living locally concept and orderly design of Adelaide that they need to be explored further in the Draft GARP.

Design and quality of space

Design should be an integral part of the "Planning and Design Code" however it is often missing or left to the end. In terms of design principles, the GARP needs to consider how our buildings interact with their environment and the people that use them, the interconnectedness and layout of our open space and transport networks and how we plan for a changing climate. Leaving good design principles out of the GARP relegates the consideration of good design to a minor function of the assessment process (at best) and at worst to the whims of the market. For this reason, design elements are linked throughout the Council response.

Transport (connectivity and movement)

Transport networks (road, rail, cycling or walking) are important to well-planned neighbourhoods, the concept of living locally and to functional cities.

The previous 30-year plan for Greater Adelaide had a goal that 60% of all new housing in metropolitan Adelaide is built within close proximity to current and proposed fixed line (rail/tram/O-Bahn) and high frequency bus routes by 2045.

Unfortunately for the City of West Torrens, a number of suburbs either don't have access to high frequency bus routes (Novar Gardens, West Beach and part of North Plympton) or are reliant on one Go Zone bus service (the 167/168 bus service)). If that bus service was removed, re-routed or not functioning then those communities would need to find alternative methods of transport. For this reason, it is recommended that transport networks including public transport (buses, trams, trains), active transport (walking, cycling, scooter) be considered in the Draft GARP.

On the balance of this analysis the Mass Rapid Transit Investigation Area shown on Figure 10 of the GARP is both welcome and supported.

Future land supply:

Corridors

The City of West Torrens has three main locations of Urban Corridor Zone; Port Road (Thebarton), Anzac Highway (Keswick, Ashford, Glandore, Kurralta Park, and Plympton) and Henley Beach (Mile End, Torrensville, Brooklyn Park). An additional Urban Corridor Zone site is located at Marleston, however this site essentially forms an island as it is mainly adjacent to existing non-residential land uses (Employment Zone and Strategic Employment Zone).

Analysis of the Metropolitan Development Activity Tracker shows that since 2015 a total of 71 development applications have been lodged for residential development with a potential 654 dwellings. A breakdown of these applications across the three main Urban Corridor Zones shows that Anzac Highway has received the most applications (57) and dwellings (474) with Henley Beach Road and Port Road lagging well behind. Despite the Port Road Urban Corridor Zone being initiated in 2013 only 1 application has been lodged for medium to high density dwellings in the subsequent 10 years. Similarly, Henley Beach Road has not seen a significant uptake for residential or mixed-use development.

Given existing land use policy conditions applicable in the above-mentioned corridors, there is considerable supply remaining within the existing corridor zones. What is not understood is the lack of uptake generally or of those developments approved, why they do not seek to maximise the zones full development potential.

For this reason, Council welcomes the Commission's proposed review into the strengths and deficiencies of current Urban Corridor Code policy and its undertaking into a commercial viability analysis to better understand the market conditions that are favourable to residential and mixed-use development on main roads.

It is recommended that Council respectfully seeks to ensure that the investigation look at the uptake and utilisation of the zone, an analysis of the obstacles hindering development, and a comprehensive examination of the eventual development prospects for these corridors. The investigation will allow exploration of where corridor zones have been successful and why, providing valuable insights that can be applied to the development and implementation of new and existing corridor zones in metropolitan Adelaide.

The rezoning of extended or additional corridor zones within West Torrens as identified in the Discussion Paper is regarded as premature. This is grounded on the following rationale:

- There is ample untapped capacity within existing corridor zones.
- It runs contrary to the change management required for adapting to the evolving urban landscape of Adelaide.
- Best practice delivery of strategic urban infill should prioritise the living locally principles.
- Introducing new or extended corridor zones may supress the uptake of existing corridors in the future.

Additionally, it is recommended that Council raise strong objection to any encroachment of Corridor Investigation Areas into existing Character Areas (shown on maps in pink) or Historic Areas.

Strategic Infill

Strategic infill refers to housing developments that typically occur on large, repurposed sites at higher densities (sometimes referred to as 'brownfield sites'). The Government's Land Supply Report (under separate cover) currently defines strategic infill sites as those that result in a net housing increase of greater than 10 houses.

The Discussion Paper shows three areas of strategic infill to be investigated within West Torrens.

The Former West End Brewery

The West End Brewery site is a strategic location and meets a number of the living locally principles contained within the discussion paper. It does require additional work to meet more of these principles, but it is undeniably a site suited for strategic infill. This is largely due to its locational advantage provided from being in West Torrens and located close to fixed line public transport networks and active travel connectivity.

Currently the former West End Brewery site is the subject of a Code Amendment and has been purchased by Renewal SA with the plan to create a mixed-use community catering for more than 1,000 new homes. The successful development of the former West End Brewery site could serve as a catalyst for additional local investments along Port Road, leading to similar transformative and strategic developments.

Council looks forward to working alongside Renewal SA to facilitate the delivery of this site as a show case of the living locally concept to benefit of new and existing residents of West Torrens but to also showcase for well-planned strategic infill within Greater Adelaide.

Thebarton Strategic Employment Zone

The Thebarton Strategic Employment Zone currently houses a wide variety of employment land uses ranging from waste transfer depots and recycling centres, biomedical labs, State Government facilities including the derelict former Mines and Energy property and food processing. It is one of the oldest industrial areas in Adelaide. Previous analysis undertaken on Council's behalf by Property and Advisory into Council's employment lands identified a change towards commercial uses and encroachment of residential land uses in this location.

Council's Employment Lands Investigation Report prepared by Property and Advisory identified the following:

The Thebarton Industrial Precinct presents several opportunities for new directions, as it contains such a mix of uses and is closely connected to the Adelaide CBD via Port Road and the associated tram line. Its relative proximity to the new RAH also suggests that a renewed development effort in Thebarton's bio-sciences precinct is warranted. This latter precinct remains less-than-fully developed some 10 years after its establishment and unless there is a renewed 'push' it might be eclipsed by other locations in Metro Adelaide, such as Tonsley.

The dominant land use in the Thebarton Industrial Precinct is commercial, with residential and retail uses also present but with a relatively minor proportion of the precinct still classified as 'Industrial', noting also that a previous food industry cluster looks to have faded off. The past decade has seen a decrease in land coded 'Industrial', and a proportional increase in 'Commercial' and 'Residential' properties in this precinct.

The reasons for the above trends are clear. Thebarton is an inner suburb that affords access to the nearby CBD with complimentary commercial uses at a comparatively low price. Added to this, there is no compelling reason for industry to be located in such a well-regarded location, except for its history there.

Further supporting this location for future investigations into a site of strategic infill are the emerging developments to facilitate the north-south corridor within the location e.g., Torrensville Bowling Club, the proposed educational facility at Ann Nelson Drive and the proposed development of the former West End Brewery. The intensification of residential and sensitive land uses necessitates an urgent investigation into the future of this area to best manage the conflict between competing land uses to avoid issues as this area transitions.

Mile End South

The Mile End South Strategic/Employment Zone was formerly a location for large scale heavy manufacturing, this precinct has transitioned into a bulky goods locality, together with several modern large scale industrial land uses.

The past decade has seen a substantial decrease in industrial properties in the precinct, predominantly being replaced by new commercial development. Residential and retail have also increased, but off a low base. This process can be expected to continue as:

- · commercial uses out-bid legacy industrial uses in Keswick; and
- the development of bulky goods land in Mile End South continues, fostering the development of complimentary commercial uses in the Richmond Road East precinct.

Employment Lands Investigations Report by Property and Advisory made the finding that:

"Mile End South is deeply entrenched as a zone of industry and bulky goods retail. There is no potential for residential development in this precinct".

Mile End South is on a long-term trajectory away from heavy industry towards mixed bulky goods retailing and commercial uses. Active industrial uses remain in the precinct (as delineated by Employment Land Investigation Report prepared by Property and Advisory), with an overhang of very old manufacturing buildings in the south of the precinct. It is expected that this will be replaced by new industrial and commercial development over the next decade or so. Given the rise of freight, logistics and warehousing land uses since the COVID-19 public health emergency, this land may be suitable for an increase in those land uses. Adequate land use direction is already in place, in the Code, for this to occur and no particular recommendations arise from our analysis for additional measures.

General Infill and Neighbourhood Regeneration

Infill development is the single largest form of new housing in Greater Adelaide with a projected net annual increase of approximately 2,500 residential dwellings. It is estimated that residential infill represents over one-third of the total dwelling stock growth in metropolitan Adelaide each year. The 30-Year Plan for Greater Adelaide (2017 Update) intends that 85 per cent of all new housing is to be built within the existing urban footprint. Targets for the next iteration of the GARP are not yet known, although presentations provided by the Commission and Department have indicated a 70/30 split.

General infill (or small-scale infill) in the discussion papers seeks to divide existing allotments in to 2-4 smaller allotments. In West Torrens this is not uncommon to be more aligned to 1 allotment into 5 or 6 smaller allotments. For this reason, the recommended response addresses neighbourhood regeneration and general infill together, with West Torrens seeing general infill at a scale where neighbourhoods are being regenerated beyond that anticipated from 'general infill'. Typically, this has occurred in the suburbs of Plympton, Kurralta Park and North Plympton receiving the bulk of this type of development.

Previously it has been noted that poor development outcomes can occur from infill if adequate planning policy is not implemented.

The issues evident included:

- Loss of existing neighbourhood character and integration within the existing streetscape,
- Poor quality dwellings,
- Loss of green cover and established tree canopy,
- Loss of open space,
- Bin storage,
- Loss of street car parking, lack of on-site parking and increased traffic,
- Increased hard surfaces,
- Increased urban heat, and
- Pressure on existing infrastructure.

When reviewing the assumptions in the GARP, Council engaged the services of property data and analytics firm PointData to prepare an investigation into the infill potential for the City of West Torrens using the existing land use policy.

PointData identify that because a property can theoretically be subdivided (i.e., it meets planning policy), it does not mean that it will be subdivided. The investigation undertaken identifies market driven development potential for the City of West Torrens based on:

- considerations of the land economics of development,
- historical development trends, and
- property characteristics.

The investigation excludes development potential contained in areas identified as strategic infill or Urban Corridor Zones. Key observations from the general infill investigation highlighted the following:

- Suburbs which have had higher infill rates continue to have higher rates based on the viable stock and favourable planning conditions, with 9 out of 26 suburbs to see an increase of +25% or more in years 1-5. This is a stark contrast to many other LGA's which are predicted to see a slight decline over the same time period due to difficult market conditions. This demonstrates the viability of the development stock in the City of West Torrens.
- After years 1-5, there is predicted to be a decline in uptake into the subsequent decade, with levels by years 11-15 slightly below those seen over the decade 2013-2022 (based on low viable stock scenario and not the high viable stock scenario). This decline is observed in 12 of the 26 suburbs, with the other 14 having sufficient viable stock to maintain historic uptake rates.
- There is sufficient viable stock for general infill to continue to be a key vessel for
 increasing housing supply in the City of West Torrens, and it continues to be a desirable
 place to live and build. Planning for general infill continues to be an important consideration
 and the stock expected from general infill is an important part of the housing mix. A key
 variable that will have a significant impact on infill rates into the next 15 years is the perception
 of what constitutes a desirable character, with the City of West Torrens' subdividable dwelling
 stock dominated by mid-century builds.

PointData's investigations align with projected capacity numbers identified by PlanSA (*PlanSA Urban Infill - Adelaide West*) placemat and numbers identified in the GARP Discussion Paper investigations for 1-15 years. A point of difference is that the PointData investigation highlights that there is capacity for infill beyond 15 years with no change to existing Code policy. To highlight this the PointData report identifies 8 suburbs (Brooklyn Park, Camden Park, Fulham, Lockleys, Netley, Plympton, Richmond and West Richmond) with significant viable stock for development beyond year 15. The number is 2343 additional dwellings under current conditions. The number is slightly higher when viewed across the council (2545 additional dwellings).

On this basis, no change is required to zones across West Torrens with supply evident beyond year 15 for general infill, which is acting as a catalyst for regeneration of neighbourhoods within West Torrens. Based on this investigation it is sought that the next iteration of the GARP does not identify further investigations into neighbourhood regeneration. Council has commenced its own investigations into general infill.

Council does not support additional policy alterations aimed at augmenting general infill or neighbourhood regeneration. Council has undertaken investigations and advises that there is a sufficient supply for this form of development, and land supply for beyond 15 years. This is also on the basis that the capacity assessment does not take into account strategic infill (Urban Corridor Zones, substantial parcels e.g. 25 Pierson St, Lockleys, the Brewery site and other locations along Port Rd).

Furthermore, and as highlighted by the infill examples within the Discussion Paper found in (Attachment 1 - under separate cover), design requirements for infill developments need to be reviewed to ensure that:

- The outcomes being delivered meet the expectations of the community;
- The development achieves the Living Locally concept principles;
- Environmental, tree canopy and urban heat cutcomes are maximised; and
- The development increases transport choices through the increased uptake of public transport and active transport modes.

Employment Lands

The regeneration of former industrial sites at the end of their productive life offers opportunities to create new mixed-use walkable communities, however there is a need to ensure enough local employment land is retained to service residents and employment growth.

When looking at rezonings across the City of West Torrens since the implementation of the new planning system there has been an alarming trend to rezone employment land to neighbourhood zones. These Code Amendments have included:

- 65-73 Mooringe Ave, Plympton Code Amendment, finalised with 1.2 Ha rezoned from Strategic Employment Zone to Housing Diversity Neighbourhood Zone.
- 107 Port Road Thebarton (Thebarton Brewery Precinct) Code Amendment, consultation completed, 8.4Ha of primarily Strategic Employment Zone to Urban Corridor (Boulevard) Zone.
- 25 Pierson Street, Lockleys Code Amendment, which has been initiated and seeks to rezone
 4.8Ha of Employment Zone to a neighbourhood zone type.

Likewise, the North-South Corridor will further impact on approximately 15.6 hectares of employment land uses within West Torrens.

Council has some early thoughts of locations for alternate strategic infill sites, however given 77.42Ha* of employment lands are currently under review for rezoning to neighbourhood zone type or infrastructure (*T2D plus current re-zonings plus strategic infill shown in the Discussion Paper). This represents approximately 29% of all land zoned Strategic Employment or Employment within the City of West Torrens (excluding the airport). Therefore, it is requested that prior to further re-zonings from employment land to other zones occurs that an investigation be undertaken to determine the amount, use and spread needed for employment lands within West Torrens at a strategic level to best maximise employment land supply and distribution.

Climate Impact Considerations

(Assessment of likely positive or negative implications of this decision will assist Council and the West Torrens Community to build resilience and adapt to the challenges created by a changing climate.)

The GARP discussion paper addresses climate impact consideration through increased tree canopy, access to open space, water supply and the urban response to a hotter and drier climate.

Conclusion

Council supports the provision of greater housing choice in well considered land releases as opposed to a piecemeal, fragmented approach which does not provide for the services required by well-functioning communities.

To provide a greater level of understanding for the community the maps contained within the GARP could breakdown areas for new housing (corridors, strategic infill and regenerated neighbourhoods and activity centres) into a pipeline of land and investigations over 5-year periods.

The summary table outlines areas/locations that Council currently support or have Code policy in affect for redevelopment and/or urban infill, areas that require more investigation, areas to be excluded and areas that are currently working. In the right-hand column of the table there are investigations that the Administration believe are required to allow for efficient development of the areas.

	Locations / Sites / Suburbs	Investigations required
Support / already has policy in the Code to facilitate development	Adelaide University (Thebarton) Port Road (Corridor Zone) Anzac Highway (Corridor Zone) Brewery Site	Site contamination Interface Catalyst/kick start for Port Rd Transport Urban greening Open space distribution and usage
Needs investigations required / already being undertaken	North side Henley Beach Road (between South Road and Holbrooks Road) Thebarton (Strategic Employment Zone)	Site contamination Interface Catalyst/kick start for Port Rd Transport Urban greening Open space distribution and usage Impact on Employment lands Building heights Impact on Character/Historic Areas Stormwater disposal
	Future living Code Amendment (how could it be included in CWT) Pierson Street, Lockleys	
Areas not previously considered by Council.	Keswick	Given the lack of investigations undertaken into these areas Council would recommend that these areas be excluded until thorough investigations are completed. This is not discounting these areas, instead they are seen as areas that due to the lack of investigations, their current functions and development and the existing site conditions can be considered in the 15 to 30-year time period.
	Ashford	
	Mile End South (Strategic Employment Zone)	

Areas to exclude	Airport layers (ANEF, OLS Building heights)	This information needs to be mapped in the GARP (and added to Figure 6 - or at least the discussion)
Areas/Zones that are currently working	General infill suburbs such as Kurralta Park, North Plympton, Plympton, Brooklyn Park.	However, a review of infill policy to ensure that new dwellings meet community expectations, design standards, greening, transport goals, etc. is required.

Attachments

- CWT GARP Discussion Paper Response (under separate cover)
 Greater Adelaide Regional Plan Discussion Paper (under separate cover)
 Residential Land Supply Report July 2023 (under separate cover) 2.
- 3.

DTI:PlanSA Submissions

From: Michelle Wooldridge

Sent: Thursday, 30 November 2023 10:52 AM

To: DTI:PlanSA Submissions

Subject: OOCE234600 - District Council of Yankalilla GARP Submission C23232 **Attachments:** Letter of Submission GARP Discussion Paper Nov 23 C23232.pdf

You don't often get email from

Learn why this is important

Dear Mr Holden

Please find attached the District Council of Yankalilla's 21 November 2023 Council endorsed Greater Adelaide Regional Plan Submission.

Thank you.

Kind regards

Michelle Wooldridge | Executive Assistant to CEO Nathan Cunningham & Mayor Darryl Houston

District Council of Yankalilla PO Box 9 | 1 Charles Street, Yankalilla SA 5203

Phone: <u>08 8558 0200</u> | Fax: <u>08 8558 2022</u> | <u>www.yankalilla.sa.gov.au/</u>

Follow us on Facebook | Subscribe to our Newsletter In The Loop



File ref: C23232



30 November 2023

Mr Craig Holden Chair, State Planning Commission

Sent via email: plansasubmissions@sa.gov.au

Dear Mr Holden

Re: Greater Adelaide Regional Plan Discussion Paper

The District Council of Yankalilla appreciates the opportunity to provide input during the preliminary stages of the preparation of a new Greater Adelaide Regional (GARP).

It is noted that the discussion is intended to '...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, our cultural and built heritage, our world class beaches and overall quality of life' (p 7 Commission Chair's Message).

Nowhere embodies these characteristics more than the Peri-urban region of Greater Adelaide and Council therefore respectfully requests that the significance of this region is elevated to at minimum its own sub region (the Peri-urban Subregion of Greater Adelaide for example) in order to fully recognise, support and reflect the area's uniqueness with overarching objectives and outcomes similar to previous iterations of the Greater Adelaide Regional Plan.

A Peri-urban Subregion

A Peri-urban Region or Subregion will better recognise the unique characteristics and challenges facing Peri-urban areas such as those in the Yankalilla District Council that are summarised as follows:

89% of the Greater Adelaide region is outside of the urban footprint (in the Peri-urban region) and serves as a popular place to visit and live, provides substantive employment and wealth creation for the state, is a major tourist attraction and a major water catchment for metro Adelaide.

The Peri-urban region generates a disproportionate share of the total value of South Australian agricultural production.



Phone (08) 8558 0200 Fax (08) 8558 2022 Email council@yankalila.sa.gov.au ABN 17 163 010 187





Due to its high visitation level, populations within the Peri-urban region fluctuate greatly which creates significant and unique issues for infrastructure and servicing planning, provision and funding.

In order to protect our premium food and wine region (ie a significant portion of the Peri-Urban region) Council and other Peri- urban Councils strongly advocate the need to identify Primary Production Priority Areas before any encroachments to the Environment and Food Production Area are considered.

With a significant expected increase in population, does the State have a Food Security Strategy? Is local food production being prioritised in order to meet both food security for our current and future population and also a reduction in our carbon footprint?

Has the importance of the role of the Peri-urban areas in agricultural production been reflected in policy? Whilst the Planning and Design Code has increased the ability for value adding and diversification, which is seen as positive, an absence of fine-grained policy and the lack of policy relating to relative scale of these 'value adds' presents certain risks associated with ongoing land use intensification and diversification and therefore land use conflict. It is important to get the balance right.

In respect to water security for our current and future proposed increases in population, is there appropriate recognition of the key role that the peri-urban region plays in containing major water catchments for the state? Has appropriate planning been undertaken, or the work that is being undertaken by SA Water intended to be adequately reflected in the Regional Plan to ensure adequate provision of water in a predicted drier climate?

Existing Rural Living Zones also need better understanding in terms of the trends and data influencing them. These matters need proper investigation and data collation and analysis to inform possible changes to the Planning and Design Code.

The Peri-urban area contains some of the State's most attractive and popular tourist drives, routes and destinations (as reflected in the Chair's message referenced above). Policies that once protected these routes have largely been lost through the transition to the Code. It is important that the Regional Plan recognises and seeks to protect these important elements of our tourism market so that Code Amendments and other strategic planning decisions can appropriately identify and protect scenic routes, scenic lookouts and the like which contribute to the landscape value and our overall tourism economy.

The Peri-urban area also contains other strategic resources such as important extractive industries and landfills that need to be identified and protected from encroachment.









The Regional Plan (or preferably the Peri-urban Subregional Plan) should identify the major economic investments that are driving growth and investment in the region and ensure their protection is prioritised.

A greener, wilder and climate resilient environment

The District Council of Yankalilla also supports the Chair's recognition of the need to recognise and protect our natural environment and to use the planning system as a tool in tackling complex issues such as climate change and net zero aspirations of the State.

Council, however, holds real concerns about how the GARP will actually deliver a 'greener, wilder and more climate resilient environment' (identified as a key outcome for Greater Adelaide) when there is a current lack of applicable policy to achieve this on the ground. For example, whilst the Urban Tree Canopy Overlay offers a tool for helping to achieve this goal, its application is very limited (it does not apply to any of the Master Planned Zones nor to many other residential zones and does not apply to any non-residential zones (Refer: *Guide to the Planning and Design Code*, June 2022 p 23 & 24). Where the Urban Tree Overlay or the limited 'landscaping' policies found in the 'Design' or Design in Urban Areas' General Modules policies do apply, in an assessment sense, they need to be considered as part of an overall assessment making it difficult to enforce/refuse an application where on balance, it may satisfy. In some instances, the corresponding 'Deemed to Satisfy' criteria does not include the landscaping component of the associated 'Performance Outcome'.

The absence of the Urban Tree Canopy Overlay to the 'Master Planned' zones is particularly concerning given that these are the zones typically (mandatorily) applied to greenfield sites.

Further, it is considered that the application of Significant Tree and Regulated Tree legislation and policy should be applied to all of Greater Adelaide in order to effectively achieve the statement on page 45 of the Paper: 'So, we need to value and protect trees, create more green spaces...and minimise the impact of development on areas with environmental value.' The application of Significant and Regulated Tree policy will provide protection to existing tree canopy that is not covered by the Native Vegetation Act 1991.

The GARP 'Idea' of 'avoiding growth in Coastal Environments such as areas susceptible to inundation and coastal erosion' is supported (p 56). This needs to happen at the GARP level (ie not including such areas as areas for growth) and also at the Planning & Design Code Level for already developed 'urban' areas through appropriate policy and referrals to the Coast Protection Board. Given it's state-wide relevance, it is considered that a review of coastal policy and referrals should be undertaken by the Commission.









A more **equitable** and socially – cohesive place and a greater choice of **housing** in the right places

The District Council of Yankalilla agrees with these outcomes and the need to identify growth in the "right place," on the premise that the first step to identifying a "right place" is a place where appropriate infrastructure is provided in advance of need, particularly for 'greenfield' locations. Provision of infrastructure ahead of need is critical to the success of growth.

Townships in Yankalilla are not identified as 'Satellite Cities' or areas for significant growth beyond the current 30 Year Plan 'town boundaries.' Council supports the retention of the existing 'town boundaries' that generally correspond with Council's 'Our Town Our Future: Structure Plan for Yankalilla, Normanville and Carrickalinga', October 2019 that identifies future growth areas for the shorter (next 15 years) and longer (15-30 years and beyond) term.

The potential growth resulting from these existing town boundaries will exacerbate the existing local infrastructure challenges faced by the District Council of Yankalilla including local and state maintained road upgrades, public transport, water, community facilities and telecommunications. Necessary infrastructure such as this and including social infrastructure needs to be equitably planned for and integrated, if not already in place, for growth locations to succeed.

The Government's 20 – Year State Infrastructure Strategy Discussion Paper, which was recently made known to also currently be on consultation and yet not widely publicised, needs to be fully integrated with the eventual outcomes of the Greater Adelaide Regional Plan in order to achieve any of the outcomes identified by the GARP Discussion Paper.

'Living Locally'

The Discussion Paper promotes a 'Living Locally' concept as a way of achieving the four outcomes proposed for Greater Adelaide's future. 'Living Locally' meaning locating housing, jobs and services closer together so people can meet most of their daily needs within a comfortable walk, ride or public transport journey from home 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.

This concept is supported, particularly for the townships of Cape Jervis, Yankalilla and Normanville, however it is considered to be a challenging outcome to achieve from a practical sense given the tyranny of distance from main transport hubs and unlikelihood of a full range of services being provided, given market requirements and funding costs being prohibitive.

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









The significant contribution to South Australia's economy from the Peri-urban region through agriculture (food and wine production) and tourism and their unique challenges are not well recognised or supported in a Regional Plan that focusses more on housing growth and metropolitan issues.

In order to achieve this outcome of a strong economy, the District Council of Yankalilla reinforces its advocacy for a Peri-Urban subregion of the Greater Adelaide Regional Plan.

In closing, whilst it is recognised that our Nation is currently experiencing a housing crisis, it is considered that a heightened focus on targets for Infill vs Greenfield is likely to, as it has in the recent past, lead to an unhealthy focus on quantitative measures and a lack of focus on quality, liveability, or market desires.

We agree with the Commission Chair's recognition of all of the features and characteristics that make the Greater Adelaide Region so special. Yankalilla and the Peri-urban regions of our State contain all of these—remnant native vegetation, biodiversity, high quality landscapes and seascapes, intact 19th century heritage, productive rural landscapes with rich soils and reliable rainfall producing high quality niche produce and attracting visitors and tourists to a unique landscape.

We wish to reiterate therefore that the Peri-urban region needs its own Regional Plan or Subregion in order to provide a relevant strategic framework.

Overall, Council commends the Commission for engaging early on this critical part of the planning system and for the aspirational outcomes and concepts that it seeks to achieve for the future of Greater Adelaide. It is hoped that our input including regarding the challenges currently presented through an inadequate policy framework are given serious consideration, or it is likely that these aspirational outcomes will remain only aspirational.

Yours sincerely



Darryl Houston **Mayor**



Nathan Cunningham
Chief Executive Officer



