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Greater Adelaide Regional Plan (GARP) Discussion Paper

This submission by Friends of Willunga Basin (FOWB) responds to the Greater Adelaide Regional Plan (GARP) Discussion Paper through a local (Willunga Basin) lens.

To begin however, it is necessary to acknowledge the broader context of the 'whole of city' document that the Paper comprises.

To this end, we have seen and read submissions made by, firstly, Messrs Hamnett & Kellett and, secondly, the Transport Action Network. We concur in very high degree with the opinions and sentiments expressed in each of them.

It follows that we believe the planning approach proposed in the Discussion Paper is not fit for purpose in several key areas, including in the inadequacy of its climate response, its failure to link land use and transport planning and its apparent rejection of the compact city model that has underpinned development planning in Adelaide for the last generation or more.

To this end, we think it important for the State Planning Commission (SPC) to pause and reflect on its duties under law. After several years of investigations and discussion, the SPC was established to provide independent and expert advice on planning matters. This followed a period where poor long-term decisions adversely affecting the State were made. Governments and Ministers come and go, but Parliament gave the Planning Commission the responsibility to rise above this and to deal with long term issues and trends via the provision of free and frank advice which transcended short term political interests.

In this respect the Discussion Paper's positions on key topics – climate change, growth management, transport and infrastructure – are of serious concern, are not supported by objective evidence and pose serious long-term risks to the State.

We note for example that the Paper has no accepted framework for the UN sponsored Sustainable Development Goals. Instead, it uses a high projections population framework favoured by property interests but not supported by demographers, pays scant regard to an ageing population and reduced household size as key drivers of housing demand, uses COVID-inflated greenfield starts via Home Builder to establish a baseline and adopts the Urban Development Institute of Australia (UDIA) mantra of the need for a guaranteed 15-year land supply pipeline. Against the former, it is household formation rates, not population growth, which drives housing demand. As to the latter,

we think it a furphy because it is hard to imagine what residential infrastructure headworks could not be delivered within (say) a 10-year time frame.

Our primary submission therefore is for the SPC to reflect on its legislated duty – which is not to the government of the day, but to the current and future populations of the state.

From this starting point, achieving, on the one hand, net zero goals for new development and built form and, on the other, a range of ‘living locally’ outcomes, should be the key strategic underpinnings of any plan for the future of Greater Adelaide – with the net zero criteria being the real litmus test. Both objectives mitigate against increasing the rate of greenfield development and require a far greater focus on non-car modes of transport in all their forms than the car-centric approach implicit in the Paper.

Regarding the reorientation towards greenfield development, Adelaide is a global leader in low density living and has no need to extend this lead. There is ample opportunity to increase the density of the existing city – including through increasing the intensity of population in the CBD, around existing regional and district centres, along established transport routes and in a number of middle ring suburbs.

On the back of changing demographics and household formation rates, the housing market has demonstrated an increasing appetite for such development in reasonable proximity to capital city facilities and services. That appetite should continue to be fed by continuing to plan for a more compact city. Since the early 1990s we understand that Adelaide has seen a 78% increase in single person households, a 52% increase in households with no children and a mere 3% increase in households with children. We ask what research into housing preferences has been undertaken by the SPC, and what evidence there is that these trends are supported by the urban growth model proposed.

While it is not necessarily as easy as greenfield development, infill housing is not a new idea across the globe. As above, it is also what consumers want. We know that a staggering increase of almost 150% is expected in people aged over 80 by 2051. As all infill developers know, demand from this cohort comes predominantly from nearby locations for well understood reasons.

The key trend is relative proportion of what kind of development is required. In the past 5 years, greenfield fell to 20% with general infill at 38% and strategic infill at 29%. Greenfield development did increase during COVID to 27% on the back of the greatest stimulus to the market seen in a generation. The Commission surely cannot accept this as a basis for planning.

The Commission might consider bringing forward case studies to illustrate how these challenges are being met in other places. It can be done. We need an Adelaide specific plan, but we don’t need to reinvent the wheel to get there. Master-planning key suburbs is the obvious method to employ.

More locally, FOWB welcomes the exclusion of land within the Character Preservation (McLaren Vale) Act 2012 from consideration for urban development. We shudder to think what future might have been proposed for the region had this legislation not been enacted.

Conversely, FOWB (as any fair-minded objective analysis would) rejects the notion of Victor Harbor/Goolwa being developed as a major regional population centre/satellite city. To begin with,

the cost of transport connections would be completely prohibitive, making the idea economically implausible from the outset.¹ Beyond this, we question what employment base might reasonably be developed in these locations, what carbon impacts such a decision would involve and, again, what analysis has been done.

Beyond this, the idea of a satellite city (as opposed to a new regional centre) warrants consideration, but there should be a focus on one location so that it can be developed at scale and can become a place where people truly want to live *and* can find meaningful employment. This might mean a population of say 250,000 over time, on which basis the Victor Harbor/Goolwa region simply does not have a land supply that is reasonably capable of being developed at reasonable cost at the scale that would be required.

Conversely, Murray Bridge/Tailem Bend (like, for example, Albury-Wodonga) has the capacity and the initial connectivity, both east and west (via freeway, and there is a rail corridor), to make the creation of a satellite city a plausible objective. Next on from Mt Barker. Logical and “orderly” – a basic planning concept. Alternatively, perhaps the Commission should be investigating potential for growth in other Regions of the State, rather than the entirely Adelaide-centric model presented in the Paper.

To conclude, we again remind the Planning Commission of its duty to be independent of government and of vested interests. In this regard, we consider the Discussion Paper to be conceptually flawed in its approach. Other approaches, such as those posited by the aforementioned Sustainable Development Goals, are available. There is also no Urban Design Framework provided to express desired physical form. Consumer trends are put to one side in favour of land harvesting for growth, predicated on weak and flimsy foundations and analysis. We ask by whom this direction is being set, and in whose interest, because we don’t believe that it is for the benefit of the community at large.

Lastly, as to the Questions posed in the Discussion Paper, FOWB’s (brief) responses are as follows:

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

Additional outcomes are required, including ‘Planning that is consistent with achieving net zero carbon emissions by 2050’ and ‘Planning that is integrated with a holistic approach to Transport Planning’.

The requirement for expansion of tree canopy and re-wilding across the city also needs to be made explicit.

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

¹ Current roadworks on South Road and Victor Harbor Road are costed at something over \$50 mill per kilometre (\$680 mill for circa 12.5 km of road). At this rate, we suggest that duplicating Victor Harbor Road all the way to Victor would cost circa \$1.5 billion. By the time such a project reached construction, it may well cost \$2 billion or more. Then there would need to be a rail line, so let’s double it and call it \$4 billion all up, for transport infrastructure alone. It’s not going to happen.

Planning for Climate Change is imperative given growing awareness of the serious risk of catastrophic climate breakdown. The September 2023 global temperature anomaly stunned climatologists, with the Antarctic ice melt and global sea temperatures hinting at tipping points being reached. Our State Government has correctly identified that we have a climate emergency. Although recognising this, the Discussion Paper does not adequately address the issue.

Ditto, integration of land use planning with public transport and other non-car transport planning is essential if people are to live locally in walkable neighbourhoods.

Population growth is almost certain to be a lot less than modelled in the Paper and the planning assumed necessary may well lead to premature, expensive and unnecessary land re-zonings and acquisitions. Baby boomers moving to apartment style living in inner suburbs and on to aged care will lead to reduced demand for stand-alone housing, as have other shifts in household composition.

What else can the GARP do to contribute to a greener, wilder climate resilient environment?

Stop allowing the destruction of significant trees across greater Adelaide.

Reduce reliance on greenfield development, encourage more medium and higher density living. Multi story developments permit a lower footprint per family and thus the possibility of a lot more trees and vegetation than ‘gutter to gutter’ housing.

Identify opportunities for large scale habitat restoration and biodiversity regeneration across Greater Adelaide.

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

Greenfield development severely compromises ‘living locally’ ambitions, increases inequality and disadvantages communities living further away from services and amenities – and vice versa. A car dependent neighbourhood inflicts great social costs from isolation, as well as from the additional financial costs of car ownership and, until electrification of the local fleet, greenhouse costs of increased emissions.

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

Environmental restoration at the scale required to reverse biodiversity loss has the potential to create thousands of jobs, over multiple generations and should be embedded in the plan.

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

Build on existing major activity centres to become more polycentric within the current urban footprint, including dispersal of appropriate employment opportunities within that framework.

Demonstration projects of housing styles not normally seen in Adelaide but common overseas, such as medium-rise mixed use development with low impact commercial on the ground floor and apartments above.

What neighbourhood features enhance living and working locally?

Access to public transport and active transport, a walkable neighbourhood that is attractive and easy to navigate, green spaces and tree canopy. Avoiding cul-de-sacs. Higher population densities are a requirement for having adequate services. The provision of office spaces, retail, education, sporting facilities, etc.

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

It can't, unless it has access to the range of facilities and services that make this possible and unless serviced by high-speed, high-frequency public transport, and master-planned. Living locally works best in established suburbs and brownfield sites closer in to the CBD.

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

There should be only one satellite city in order to ensure requisite scale for creating the economic and social settings that underpin and sustain a city. Murray Bridge/Tailem Bend are already partially connected to Adelaide (by road but not passenger rail), have the benefit of a river setting and have space to accommodate a substantial population. Victor Harbor/Goolwa have none of these attributes, it would be cost prohibitive to make appropriate transport connections and topography/geography is a serious constraint on ultimate development capacity. Development to the north of Adelaide will simply consume more productive agricultural land.

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

The land development industry loves an approach that is familiar and yields good profits. For the homeowner however, any upfront cost advantage is rapidly eroded by financial costs of transport and the personal costs of wasted time, social isolation and disadvantage for all when supporting transport, employment and social services are remote from such development.

As above, further development to the north of Adelaide also continues to consume productive agricultural land.

How can infill development achieve an urban form that is consistent with the principles of Living Locally? What do you see as the benefits and potential drawbacks of infill development?

Infill is essential to increase the population density in areas with services, where living locally is realistic. A particular drawback is loss of open space and tree canopy but with greater planning and careful design this can be ameliorated. Reducing aggregate building footprints (by encouraging multi-story development in appropriate locations) would help preserve green space.

With good planning infill can occur with adequate open space and canopy and is popular and value-adding if it's done well. Master-planning is key to this.

Where is the next generation of strategic infill sites?

Around existing Regional and District Centres, where there is huge potential to live locally in walkable neighbourhoods, if government will lead the way. Along existing rail corridors, where the surface has barely been scratched. In selected areas, in both the western suburbs and middle ring suburbs where current residential densities are very low.

The planning system needs to be ahead of the game in this regard so that the greatest opportunities are not squandered, such as around Marion Regional Centre, where the density of new (ad-hoc infill) residential development in recent years falls well short of what might be achieved through regional master-planning.

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

Private open space is being lost – a place to grow vegies or a fruit tree or two, an activity which, in turn, is good for the soul. Gutter to gutter housing does not and will not provide open space for such activities which therefore needs to be replicated within each neighbourhood. Not sterile parks but true community spaces where people can come together and get some dirt under their nails.

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

Firstly, stop allowing the wholesale destruction of existing canopy for no good reason. Then get serious about increasing canopy cover and set a specific canopy target as Sydney and Melbourne have done (40% by 2040) rather than the current target of a 20% increase.

In a climate challenged world, canopy cover is a de-facto public health issue and should be treated as such.