InfrastructureSA

# South Australia's 20-Year State Infrastructure Strategy Discussion Paper

## Submissions from Local Governments

infrastructure.sa.gov.au

From: David Bailey [redacted]
Sent: Monday, 13 November 2023 1:12 PM
To: Infrastructure SA
Subject: Submission to Infrastructure SA - State Infrastructure Strategy Discussion Paper - Attn Strategy Team
Attachments: Adelaide Plains Council - Submission to Greater Adelaide Regional Plan Discussion Paper - 30 October 2023.pdf; Adelaide Plains - Infrastructure Challenges - For HIPDU - 13 November 2023.pdf

[redacted]

Hello Infrastructure SA

Please find attached Council's formal submission to the Discussion Paper on the Greater Adelaide Regional Plan. This submission was formally adopted by Council at its meeting in late October.
It is also available via Strategic Projects | Adelaide Plains Council (apc.sa.gov.au)

This email submission to ISA is prepared at officer level.

Time has not permitted us to prepare a submission structured to respond to the Infrastructure SA Discussion Paper questions.

Nonetheless, the GARP submission highlights the importance for ISA of the following:

- Adelaide Plains experiencing rapid urban growth and planned for more urban growth, the importance of integrated and aligned strategic planning for development with infrastructure across 'all of government' is critical.
- 80% of current residential growth is planned at Two Wells and GARP flags even further growth, both residential and employment, at Two Wells.
- Gawler River needs infrastructure investment for flood management and recreation purposes to lessen flood impact on the northern Adelaide plains food bowl as well as existing and planned residential growth on the floodplain. The State Planning Commission propose a new Metropolitan Open Space Strategy. APC seek a specific strategy about the Gawler River in the MOSS, and for Infrastructure SA, its planning should include a specific strategy about the Gawler River. This is particularly the case in light for both forecast residential growth but also the important role of the Foodbowl economically

The attached Adelaide Plains – Infrastructure Challenges For HIPDU 13 November 2023 – has been prepared by Council officers to summarise the key infrastructure challenges within Adelaide Plains.

- The challenges identified are for types of infrastructure not provided by Council in its infrastructure role.
- The challenges are associated with growth already planned rather than for growth flagged in GARP.
- For growth already planned, the lack of water and electricity for example presents key barriers for envisaged development, be it for housing and agribusiness. There are other challenges Council is endeavouring to plan and budget for infrastructure within its responsibility, such as open space, community centres, and local roads, through its strategic plan, Long Term Financial Plan and Asset Plans, informed by Council's adopted Growth Strategy.

We request ISA to review Council's formal submission to GARP and the summary of infrastructure challenges in Adelaide Plains.

We request the updated Infrastructure Plan contain specific proposals to address the infrastructure challenges within Adelaide Plains.

David Bailey
**Strategic Projects Officer**
**Growth and Investment**
[redacted]
Adelaide Plains Council
www.apc.sa.gov.au

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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.

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30 October 2023

Reference: D23/48569

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

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.

| Key Comments Submission | |
|---|---|
| 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.<br><br>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.<br><br>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.<br><br>If urban growth is to occur there is a need for infrastructure provision and local employment to keep pace with residential growth. |

| | |
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| | 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.<br><br>The draft Strategy needs to include detailed and timed 'whole of Government' infrastructure proposals, both physical and social.<br><br>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.<br><br>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:<br>• a specific strategy envisaging the Animal Husbandry area continuing.<br>• timing about the progressive lifting of the EFPA of land zoned for rural living/animal husbandry throughout Lewiston.<br><br>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. |

| | |
|---|---|
| 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.<br><br>Council requests the Commission consider the following:<br>• 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.<br>• 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.<br>• Unrealised opportunities of food production areas involve tourism and education<br><br>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.<br><br>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.<br><br>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.<br><br>Council requests the Commission be aware of the following:<br>• Managing flood hazard is a key outcome for agribusiness and residential interests in the flood plain<br>• Much of the Gawler River proper is in private ownership<br>• Hazard and funding options investigations by the Gawler River Flood Management Authority are ongoing<br>• 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.<br>• 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.<br><br>The Commission's 'Planning for Climate Change' Brochure[1] outlines various proposals for including for change of the Planning and Design Code that need proper investigation.<br><br>The current statutory arrangements and Planning and Design Code within Adelaide Plains are lacking with respect to inadequately planning ahead to address the |

[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:<br>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.<br>2. Ordinary Council Meeting Agendas contain reports that are subject to confidentiality orders with dates and titles as follows:<br>a. 24 July 2023 - Dublin Urban Land Development.<br>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

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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'.

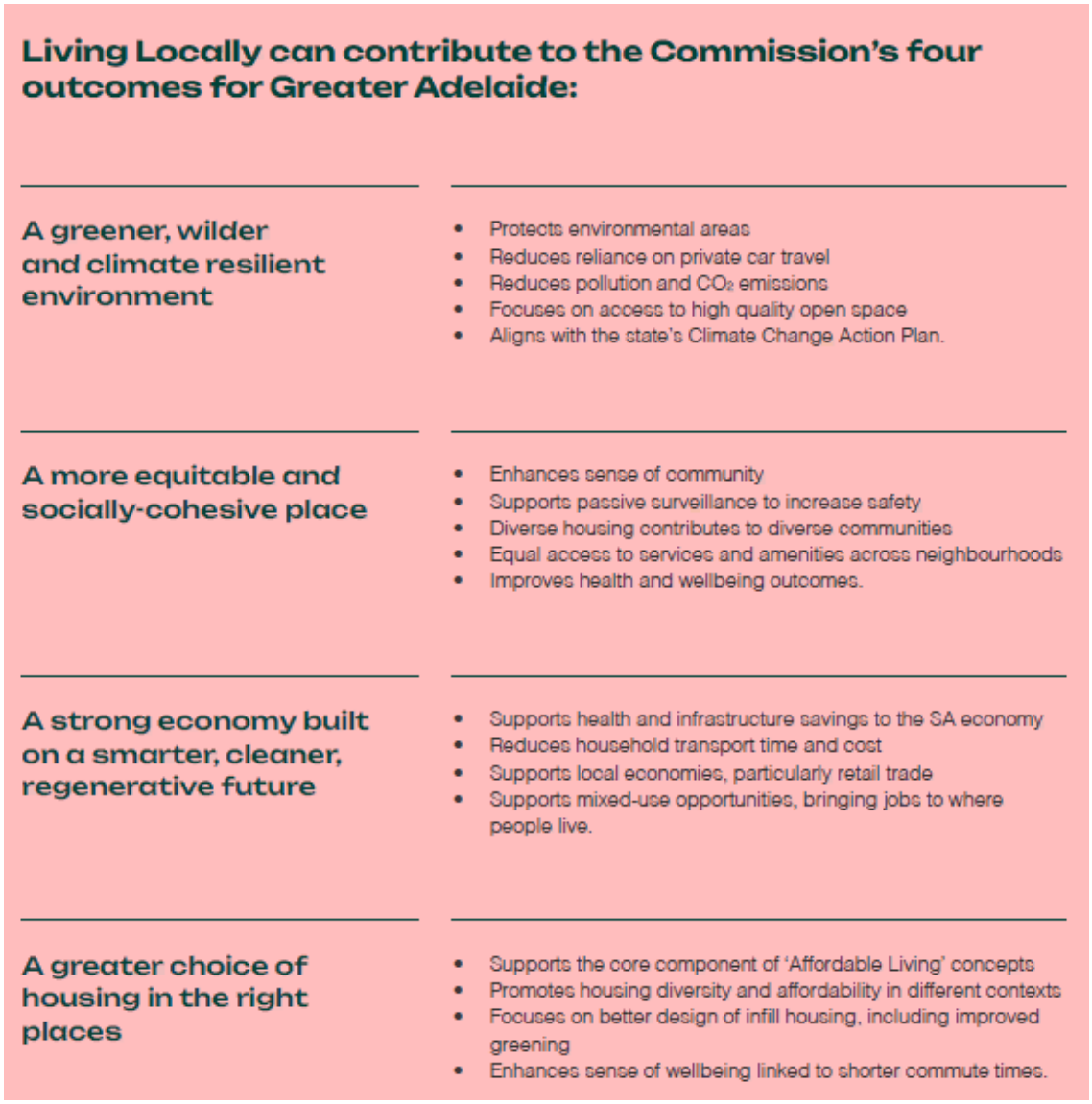



*Figure 1 Four Outcomes are intended for Greater Adelaide, with living locally supporting all four*

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[1] 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.

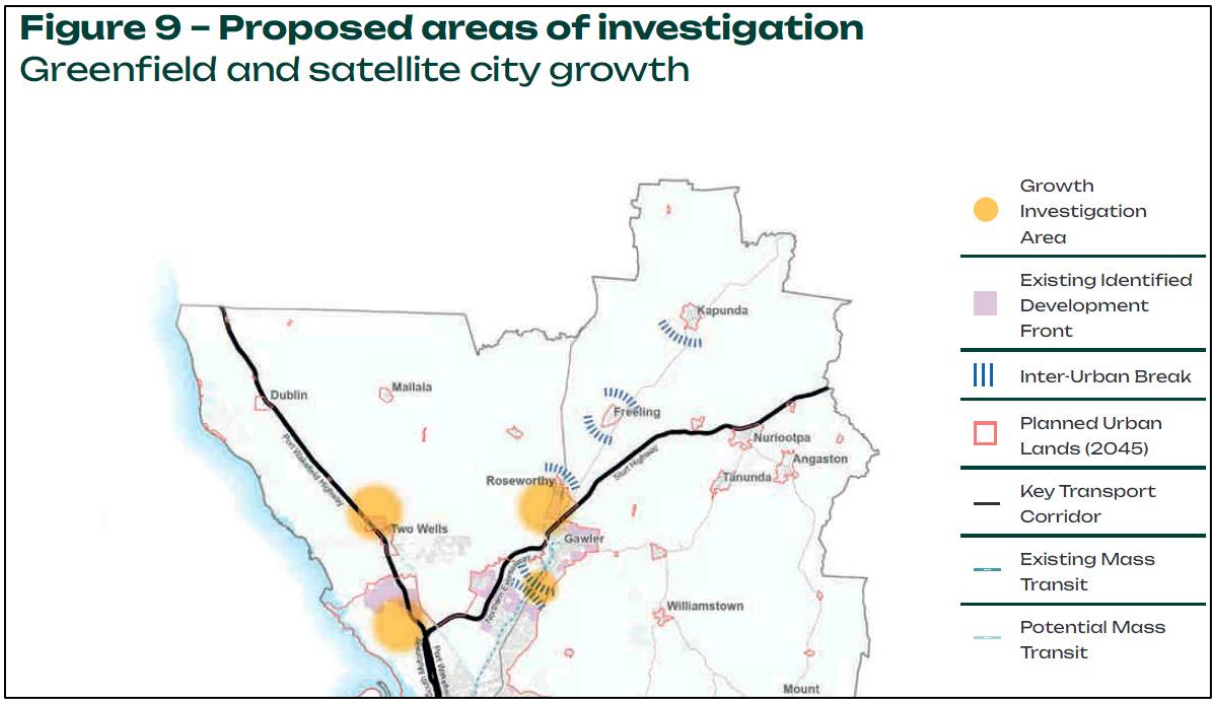
A 'whole of government' approach is needed to ensure the Commissions four outcomes for Greater Adelaide are met.

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.



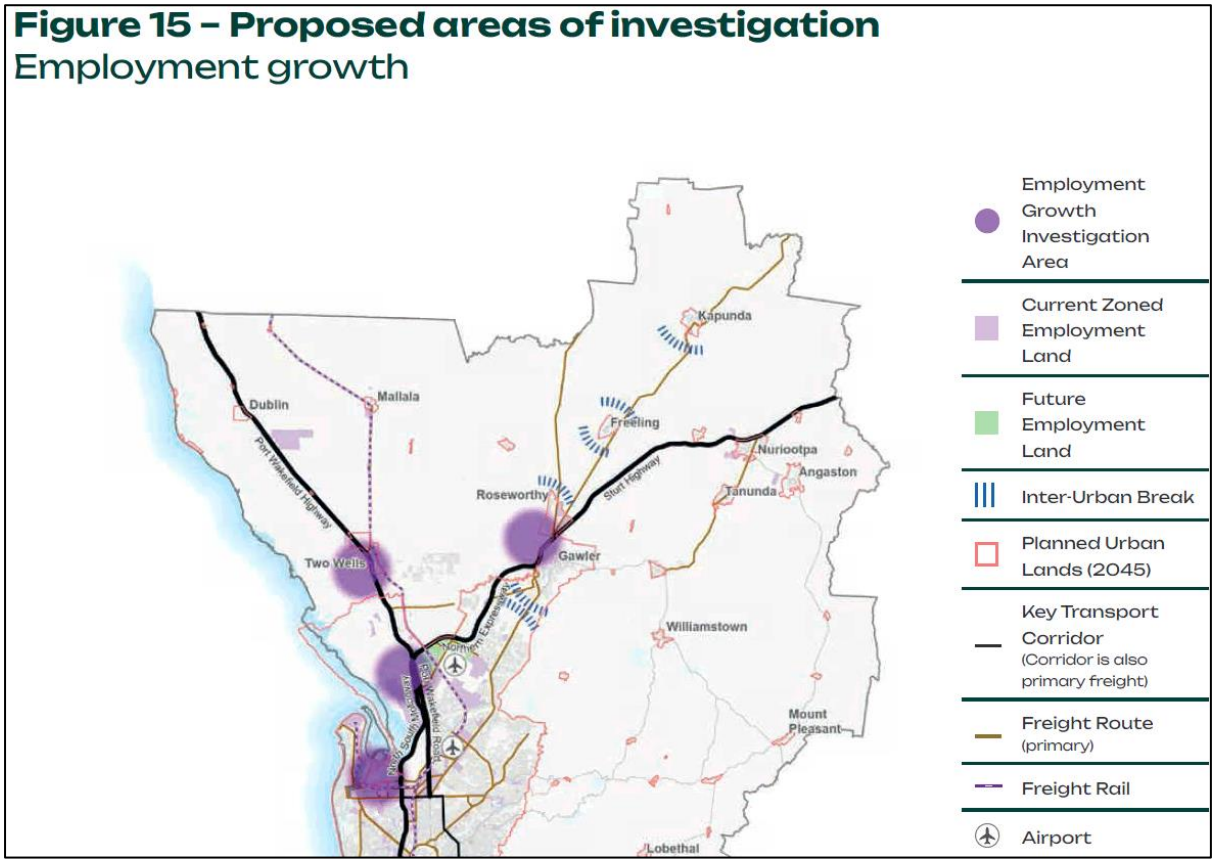




*Figure 2 Proposed Areas of Investigation in the Discussion Paper*

## 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 signifcant 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 Plan[2] for Adelaide Plains, Light Regional, Barossa and Gawler seeks improved public transport, the establilshment of a regional community passanger network, and targetted improvements in walking and cycling networks.

[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.

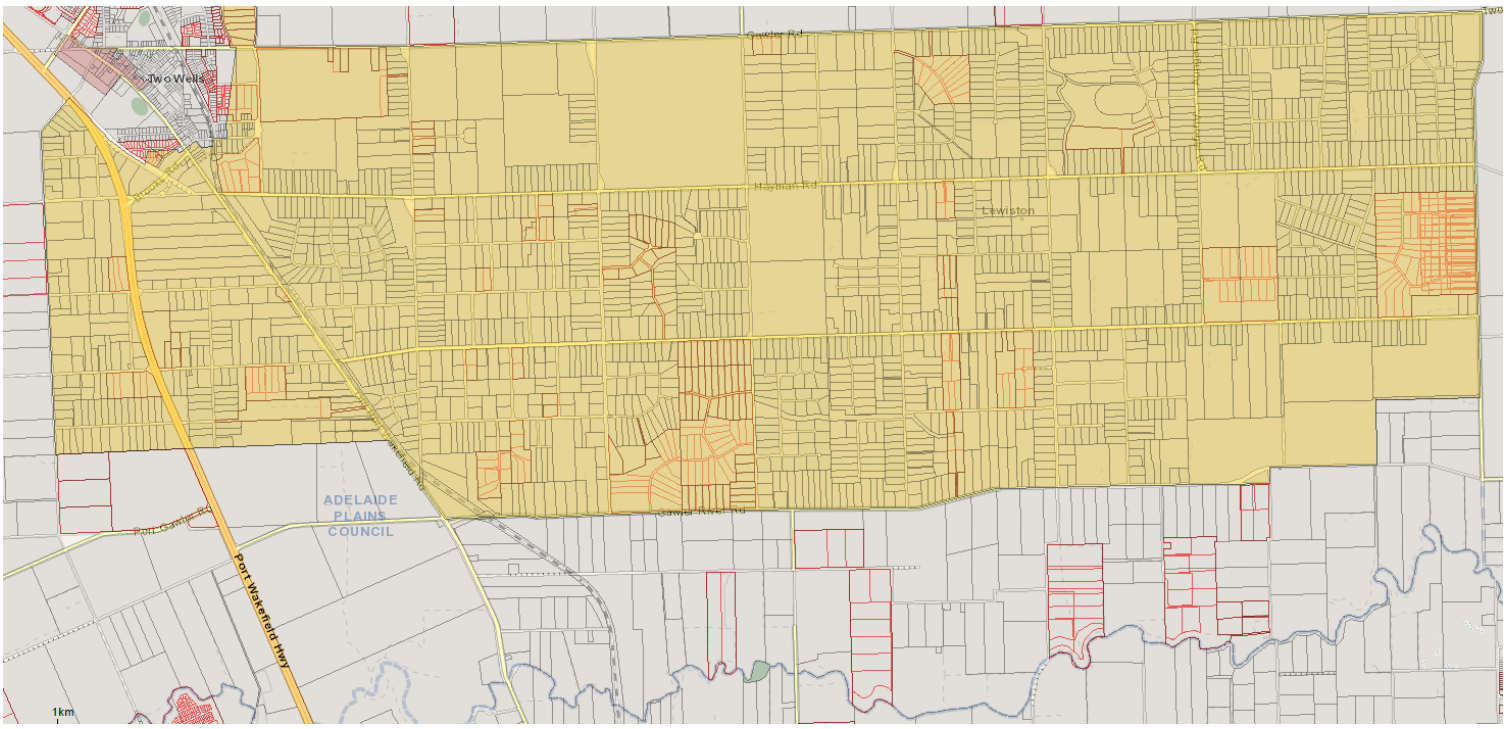



*Figure 5 The large undivided lots are unable to be subdivided for rural living due to the EFPA. Map (SAPPA September 2023) shows new rural living lots progressively being bought to the market due to land divisions being lodged prior to the EFPA coming into effect.*

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*

Invesigations and engagement over 2022 lead to Council's adopted Equine Strategy[3] 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 apc.sa.gov.au/council-services/development/strategicprojects

**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 funciton 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.

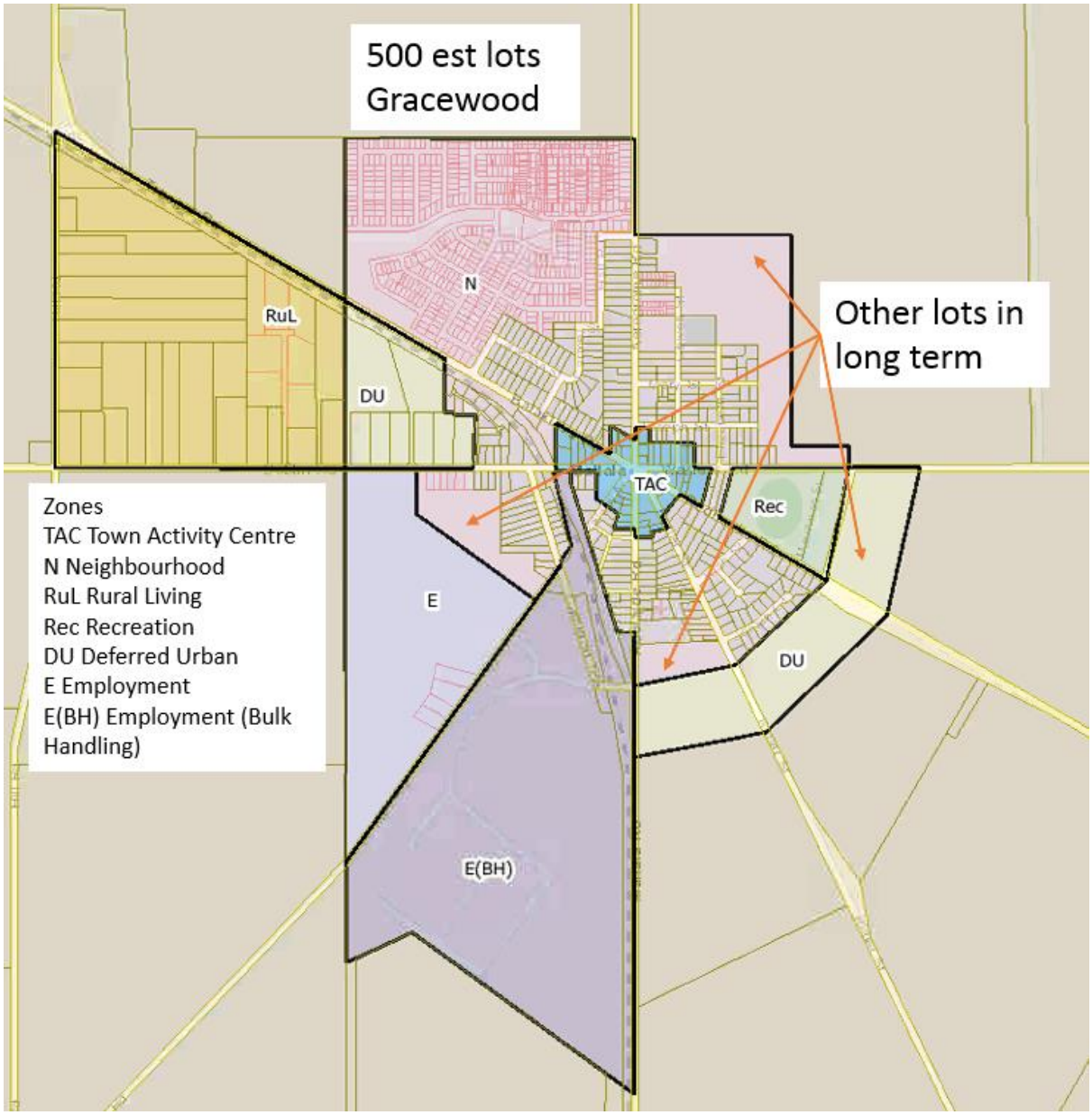



*Figure 7 Zoned land for growth at Mallala*

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

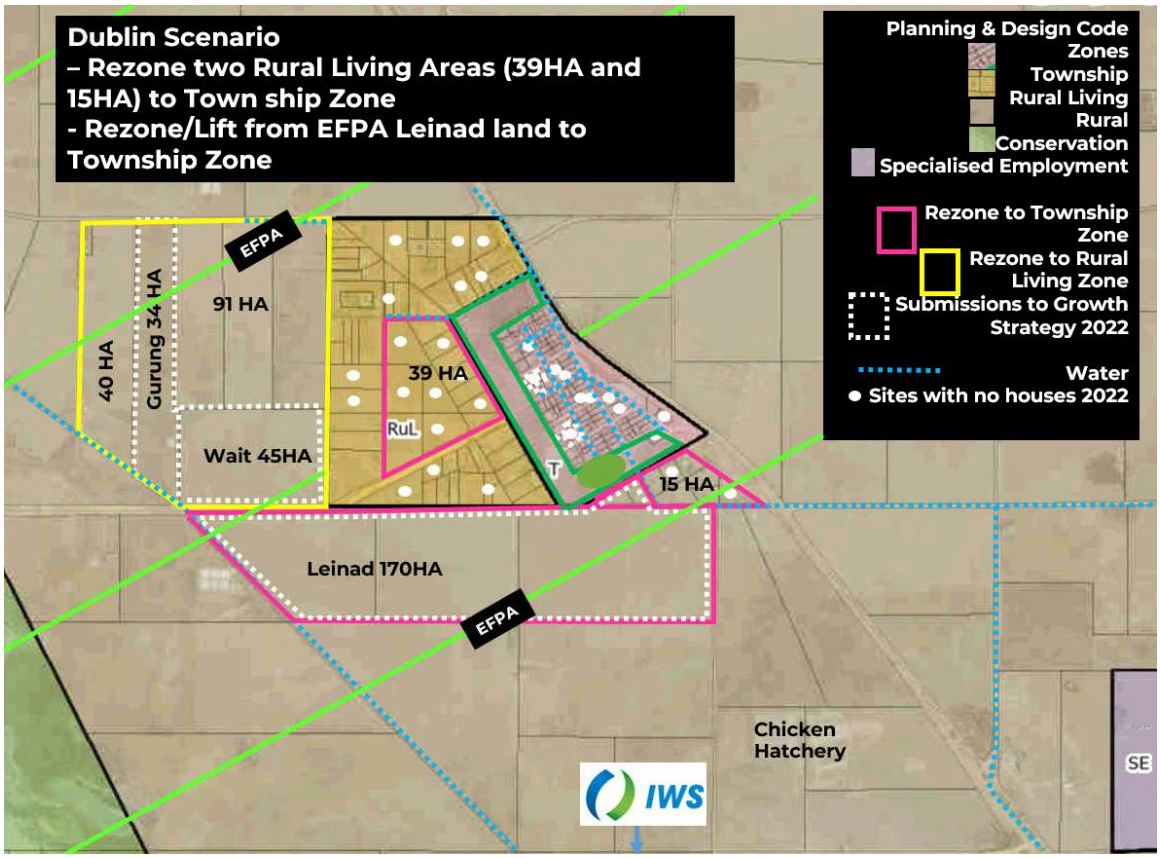



*Figure 8 The 2022 scenario proposed in submissions to Council's Growth Strategy involve expansion of the township zone to the west and south, and further Rural Living to the west*

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.

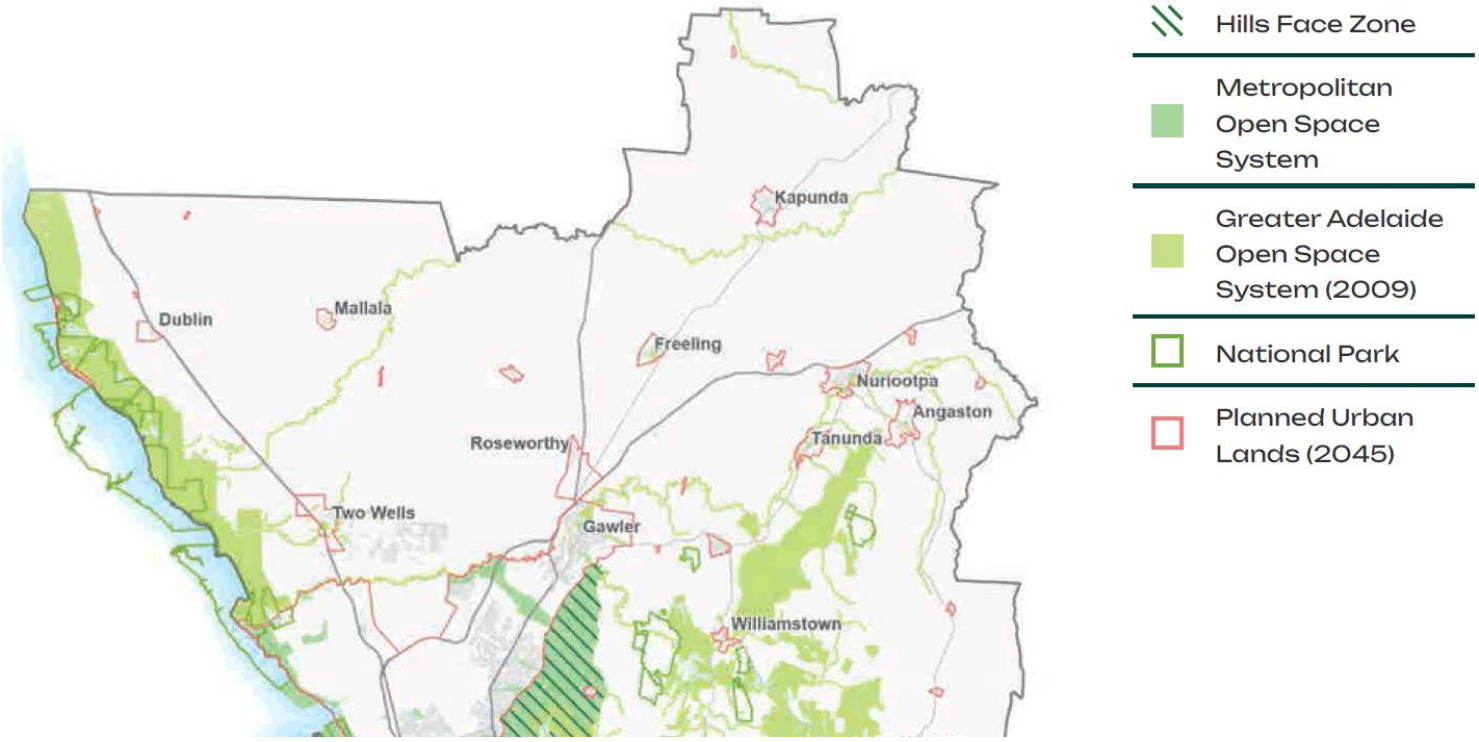



*Figure 10 2010 and Current MOSS areas as shown in the Discussion Paper*

Background

The Adelaide International Bird Sanctuary National Park - Winaityinaityi 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 Authoity. 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' Brochure[4] 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

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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[1] 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] apc.sa.gov.au/__data/assets/pdf_file/0023/355181/Adelaide-Plains-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 forecasts[2] 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 2050[3].

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 2021[4] grows by 1300 to around 2300 in 2040.

[2] 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] quickstats.censusdata.abs.gov.au

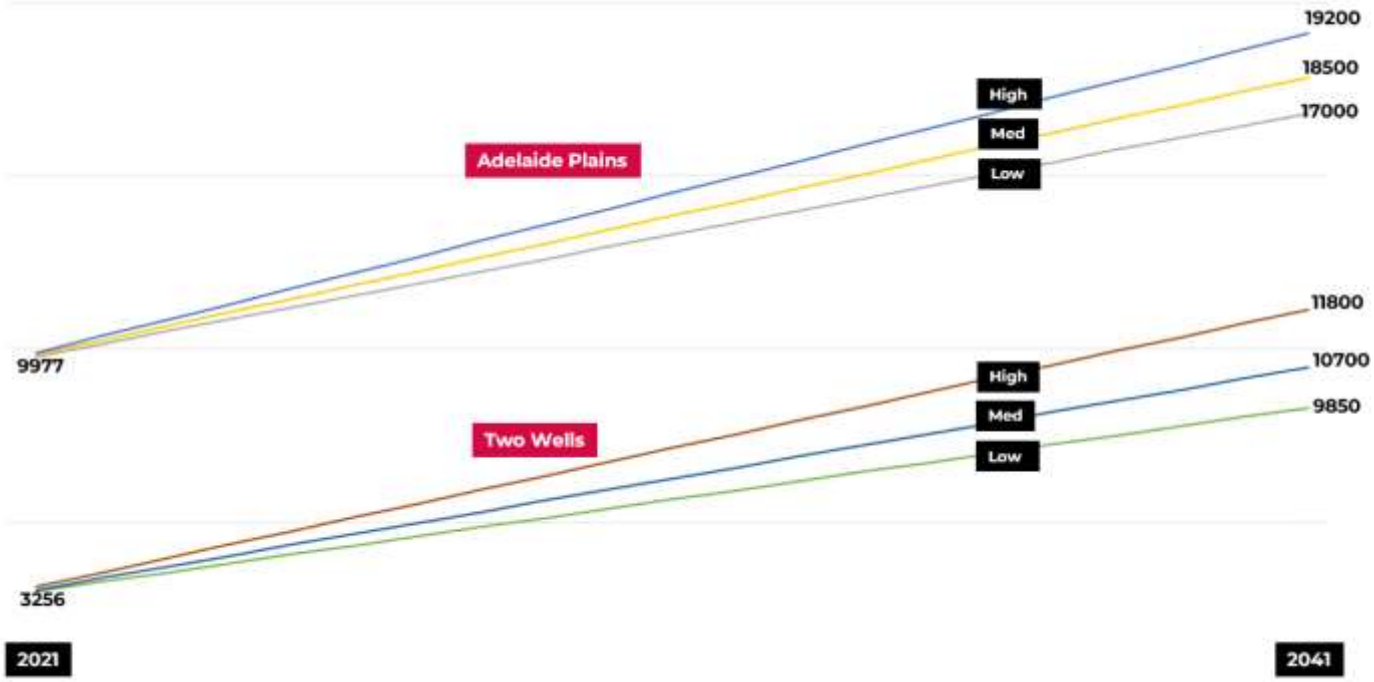
- At Lewiston, some 600 residents move into existing lots or lots with approvals pending release over the next 20 years. This number recognises the impact of flood risk entails the more readily developable land has already been developed, and the impact of the EFPA on precluding the ability for further 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.

| APC and Two Wells Population Forecast Estimates Summary | | | | | | |
|---|---|---|---|---|---|---|
| | 2020[5] | 2021 ABS | 2041 est | Increase est | Dwellings/ Annum est | Residents/ Annum est |
| Adelaide Plains HIGH | 9441 | 9977 | 19,177<br>19,100 | 9,736<br>9,700 | 175 | 460 |
| Adelaide Plains MEDIUM | 9441 | 9977 | 18,477<br>17,800 | 9,036<br>8,400 | 150 | 400 |
| Adelaide Plains LOW | 9441 | 9977 | 16,977<br>16,800 | 7,536<br>7,400 | 132 | 350 |
| Two Wells[6] HIGH | 2743 | 3256 | 11,756<br>11,700 | 9,013<br>8,900 | 160 | 425 |
| Two Wells MEDIUM | 2743 | 3256 | 10,856<br>10,700 | 8,113<br>8,000 | 140 | 380 |
| Two Wells LOW | 2743 | 3256 | 9,856<br>9,700 | 7,113<br>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

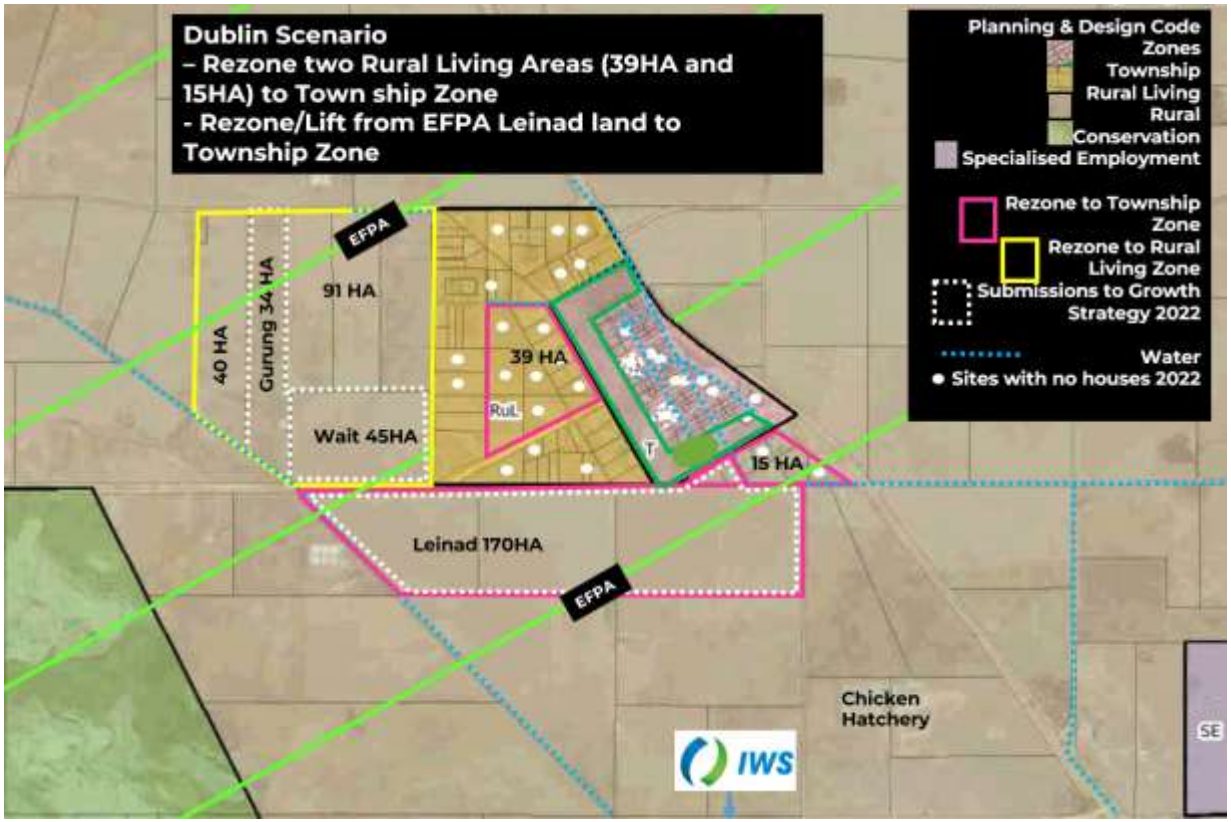
In 2019, Council decided to support investigations for potential further urban growth on the Hicks land at Two Wells and to the south of Dublin on the Leinad land. Submissions in the 2022 consultation affirmed interest in potential urban growth at the Hicks land and to the south and west of Dublin.

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

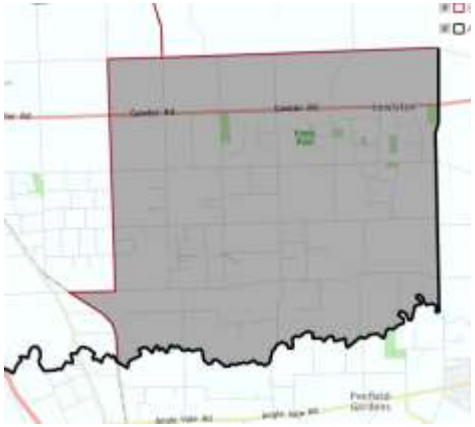
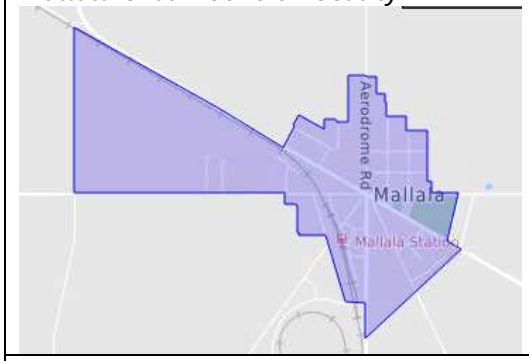
Under a MEDIUM scenario, Adelaide Plains grows from 9441 in 2020 to 18,500 in 2040. If both Hicks and Dublin land was released and fully developed within that timeframe, this would lead to Adelaide Plains in 2040 being around 25,000. This would be a 2.5 times population increase.

Noting available land within Adelaide Plains and the State Planning Commission's 2021 assessment[7] 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.

[7] plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_areas

## MAIN LOCATIONS OF POPULATION GROWTH

| Main Locations of Population Growth | | |
|---|---|---|
| | Current | 2041 est |
| Two Wells SA2 (Statistical Area Level 2)<br> | 3256 (2021)<br>2743 (2020) | 10,900<br><br>(IF Hicks land fully developed, Two Wells becomes 13,400) |
| Lewiston SSC (State Suburb)<br>  | 3310 (2021)<br>3076 (2016) | 4050<br><br>3500 |
| Mallala Urban Centre Locality<br>  | 1042 (2021)<br>894 (2016) | 2300<br>1700 (assumes Gracewood developed) |
| Dublin SSC<br> | 405 (2021) | 500<br><br>(IF unplanned growth land is fully developed long term, Dublin and nearby rural areas becomes 4500) |
| Thompson Beach<br> | 219 (2021) | 300 |

## RELATIONSHIP WITH OTHER STRATEGIES

### Strategic Plan

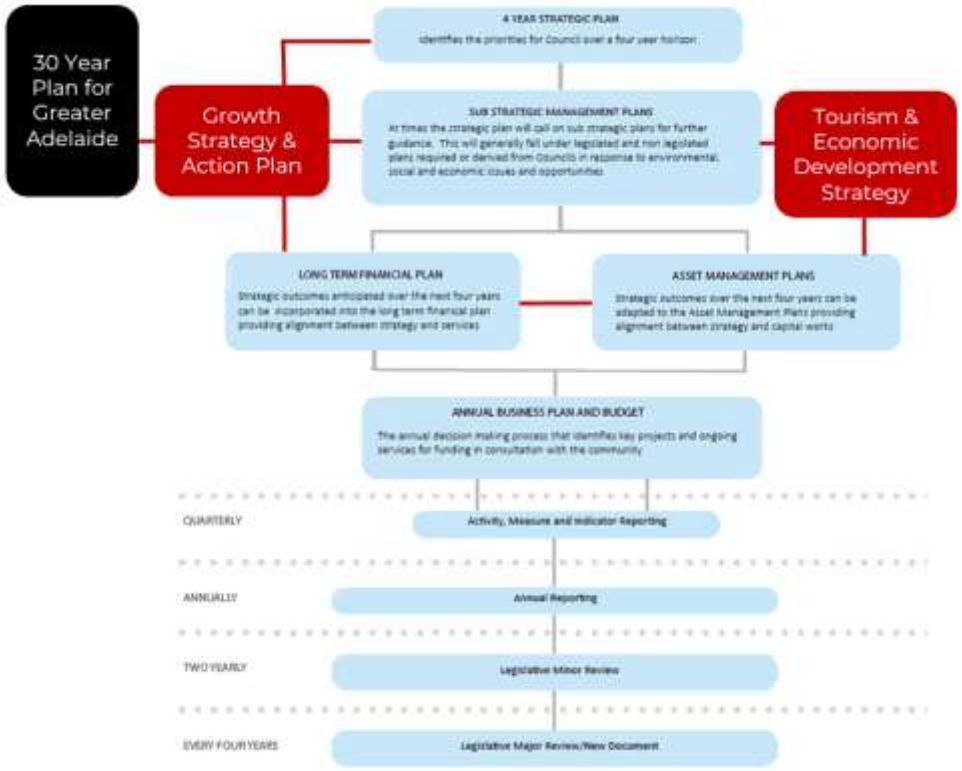
The GSAP:

- 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

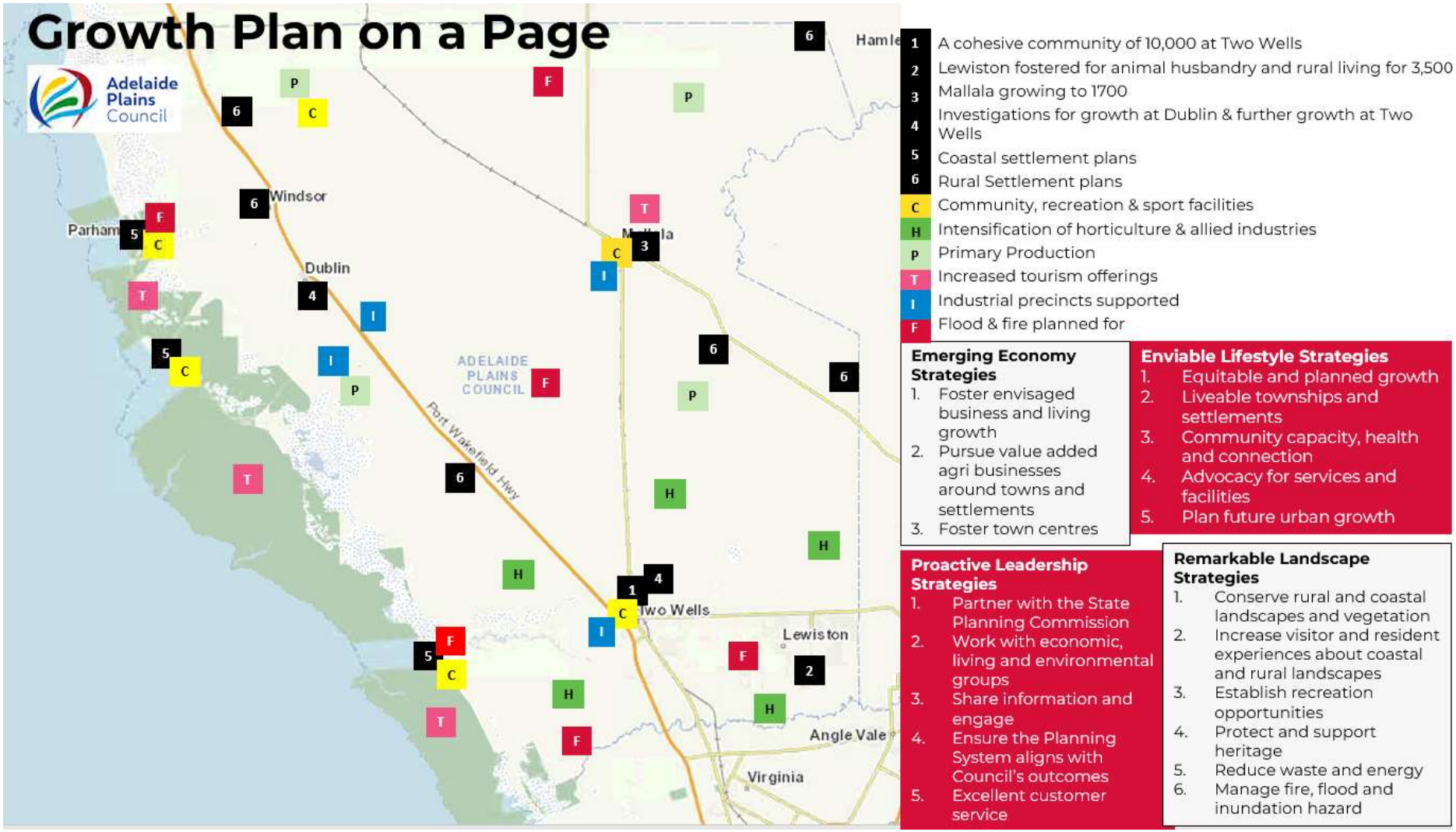
Council has a Long-Term Financial Plan looking forward 10 Years. This was released for consultation in late 2021. The LTFP includes various studies informing planning for growth.

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.

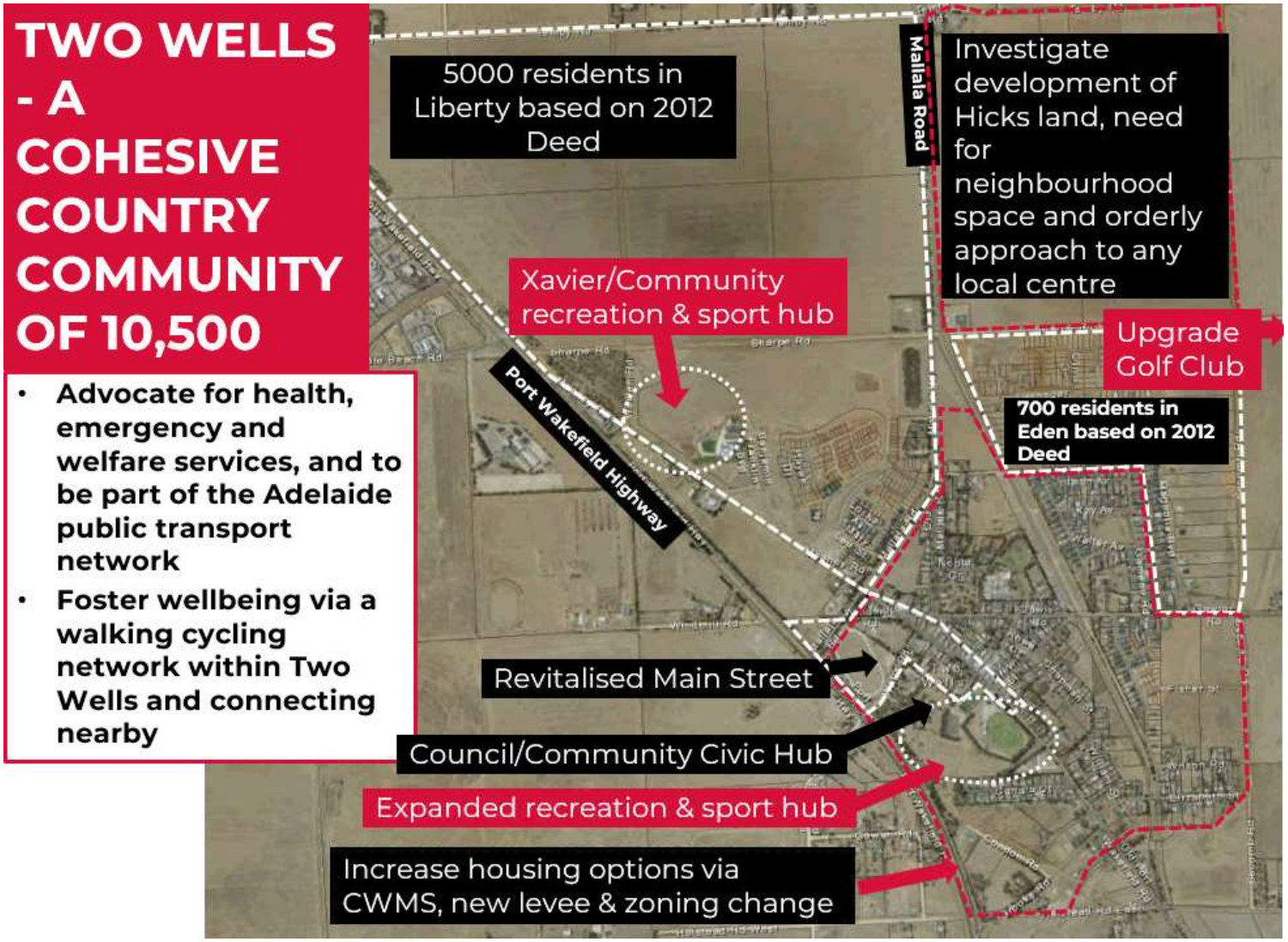



*Image – Summary of Two Wells Actions to Support a Cohesive Community of 10,500*

## 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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Population | 3256 | 3636 | 4016 | 4396 | 4776 | 5156 | 5536 | 5916 | 6296 | 6676 | 7056 | 7436 | 7816 | 8196 | 8576 | 8956 | 9336 | 9716 | 10096 | 10476 | 10856 |
| Town Centre | Facilitate growth of Two Wells Main Street through development of contemporary retail offering | | | | | | | | | | | | | | | | | | | | |
| Community Civic Hub | Plan and deliver community civic hub | | | | | | | | | | | | | | | | | | | | |
| Xavier Recreation Precinct | Work with Xavier on vision, noting Deed requiring oval, soccer field, and two courts for netball/tennis and shared school/community use | | | | | | | | | | | | | | | | | | | | |
| Town Centre Recreation Precinct | Plan and create upgraded sport and recreation precinct adjacent the Town Centre. Consider need and business case for indoor recreation. Consider Crown Land and land adjacent Cemetery. | | | | | | | | | | | | | | | | | | | | |
| Local Northern Centre & Recreation Precinct | Noting potential 2,500 in Hicks, investigate and advocate for a local centre to provide convenience goods and services in the northern part of Two Wells. Consider colocation with recreation and sport uses, and a community/shared hall or space. Consider range of locations, including adjacent Mallala Road. | | | | | | | | | | | | | | | | | | | | |
| Increased Housing Choice | | Rezone land inside levee. Consider options for large sites | | | | | | | | | | | | | | | | | | | |
| Walking Cycling Network | Prepare Plan | start delivery | | | | Update | continue delivery | | | | | | | | | | | | | | |
| Public Transport incl interchange and EV's | Ongoing advocacy and planning | | | | | | | | | | | | | | | | | | | | |
| Town CWMS | Plan and install. Note this opens up housing choice | | | | | | | | | | | | | | | | | | | | |
| Hicks | Scope Hicks potential for 2,500 residents to inform a position in 2026 EFPA review. | | | | | | | | | | | | | | | | | | | | |

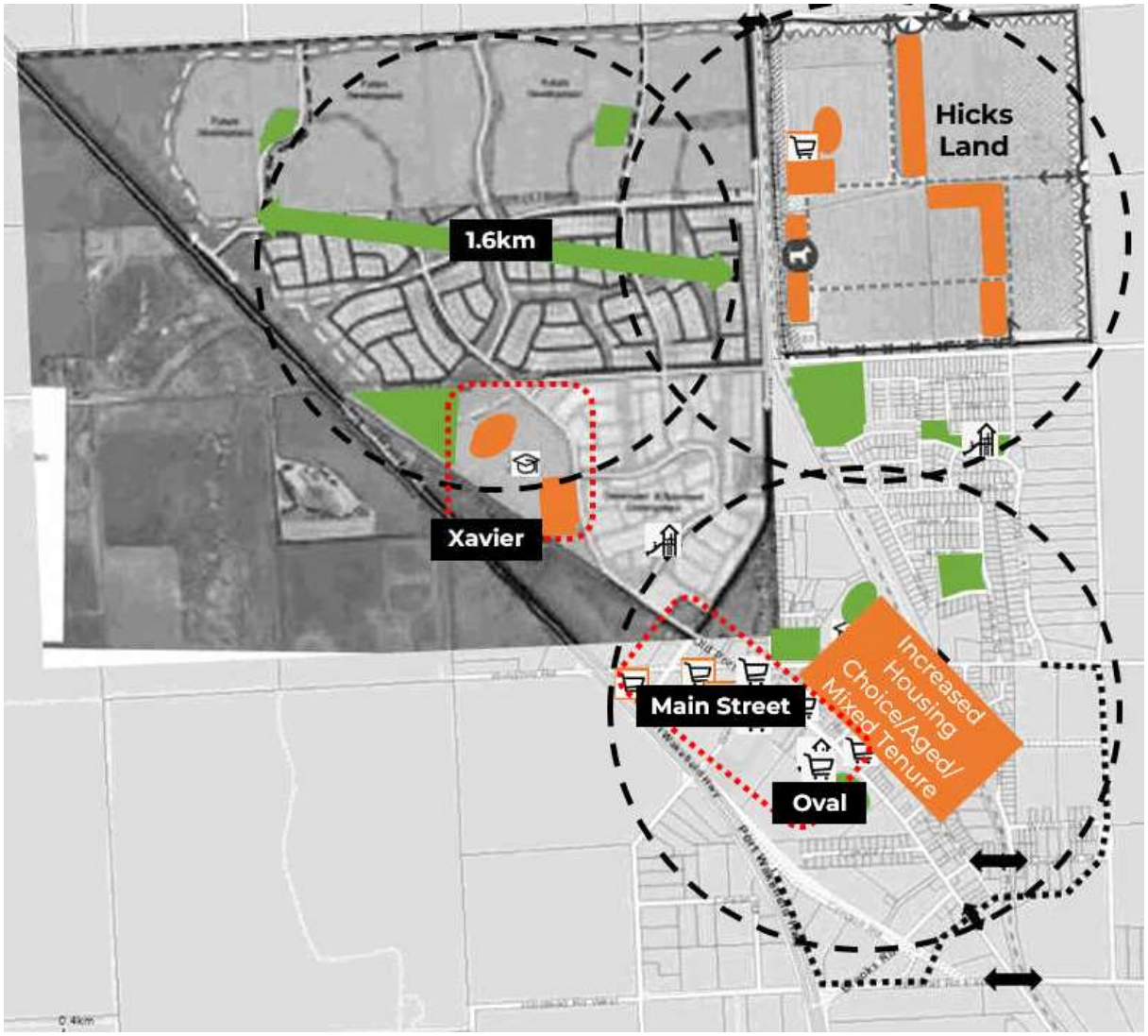
## One Scenario for Two Wells

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.
2. **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:
    - planning for timely provision of suitable infrastructure to enable an enviable lifestyle
    - 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.<br><br>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.<br><br>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.<br><br>LTFP 28 Feb 2022<br>• Social and Community Infrastructure Plan $100k 22/23<br>• Open Space & Recreation Strategy $60k 22/23<br>• Stage 1 Two Wells/Mallala Ovals Master Plan $100k 22/23 | Investigate in Short to Medium Term |
| 6. | **Lewiston** - identify a preferred future through investigating and engaging. Consider:<br>- The aspired land use mix into the future, noting trends in agriculture, equine and living<br>- Opportunities to enhance the gathering point at Hayman/Pederick<br>- Options to improve connectivity – including walking, cycling and equine – to Two Wells, north, east and south<br>- 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.<br><br>LTFP 28 Feb 2022<br>• Dublin Township Growth & Tourism Master Plan $50k 22/23 | Investigate in Short to Medium Term |
| 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 |

| | | |
|---|---|---|
| 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.<br><br>LTFP 28 Feb 2022<br>• Social and Community Infrastructure Plan $100k 22/23<br>• Open Space & Recreation Strategy $60k 22/23<br>• Stage 1 Two Wells/Mallala Ovals Master Plan $100k 22/23<br><br>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.<br><br>LTFP 28 Feb 2022<br>• Social and Community Infrastructure Plan $100k 22/23 | Ongoing |
| 15. | **Two Wells CWMS** - for the original township, establish a CWMS following investigations and engagement.<br>(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:<br>• Appropriate public transport provision, including investigating and planning for an interchange including with a park n ride facility.<br>• Electric vehicle charging points<br><br>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<br>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.<br>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.<br>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. | Medium Term |

## 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.<br><br>This includes:<br>• Agricultural and food-based business clustering, precincts and estates near townships<br>• Hubs around infrastructure<br>• 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.<br><br>Amend Transport Action to reflect intent to plan for road/trail networks including for physical activity.<br><br>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.<br><br>This includes:<br>• Upgrade the main street public realm<br>• Progress the 8HA Crown land development for a mix of commercial, retail and community facilities.<br>• 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).<br>• Planning for a variety of movement modes, including walking, cycling, business needs, buses, recreational vehicles, and visitors. | Investigate in Short to Medium Term |
| 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.<br><br>**Two Wells Northern Centre** – investigate and advocate for an orderly approach to centre planning in the northern part of Two Wells. | Investigate in Short Term |

## 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:<br>- Trails strategy for walking, cycling and equine<br>- Associated with the Adelaide International Bird Sanctuary and coastal settlements, as well as the Gawler and Light Rivers.<br>- Associated with landscaped based recreation, including walking, cycling, equine, and adventure based.<br>- Visitor accommodation options<br>- Cohesive visual approach to entrances and other physical features of towns<br>- 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<br><br>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:<br>• townships as built features increase, in particular:<br>  o open space areas to increase amenity value for residents<br>  o walking and cycling routes<br>• infrastructure<br>• major developments<br>• public and private land in rural areas. | 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:
    - 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:

- Long term financial plan
- Tourism and Economic Development Strategy
- Recreation and Open Space Strategies
- Asset Management Plans
- Social and Community Service Plans
- Environmental Plans
- 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

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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.

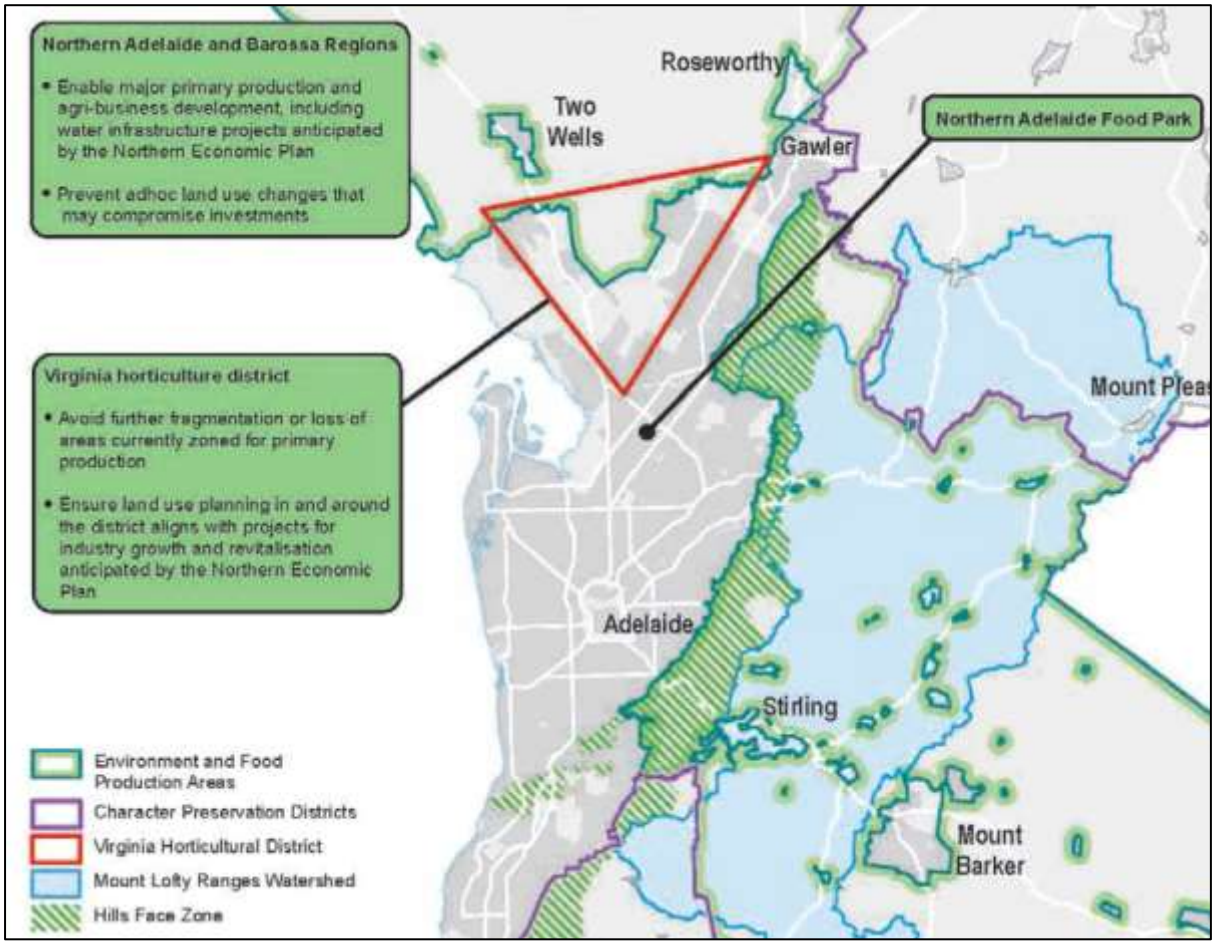
**30 Year Plan for Greater Adelaide**

*Liveable Growth*

The 30 Year Plan for Greater Adelaide[1] 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.

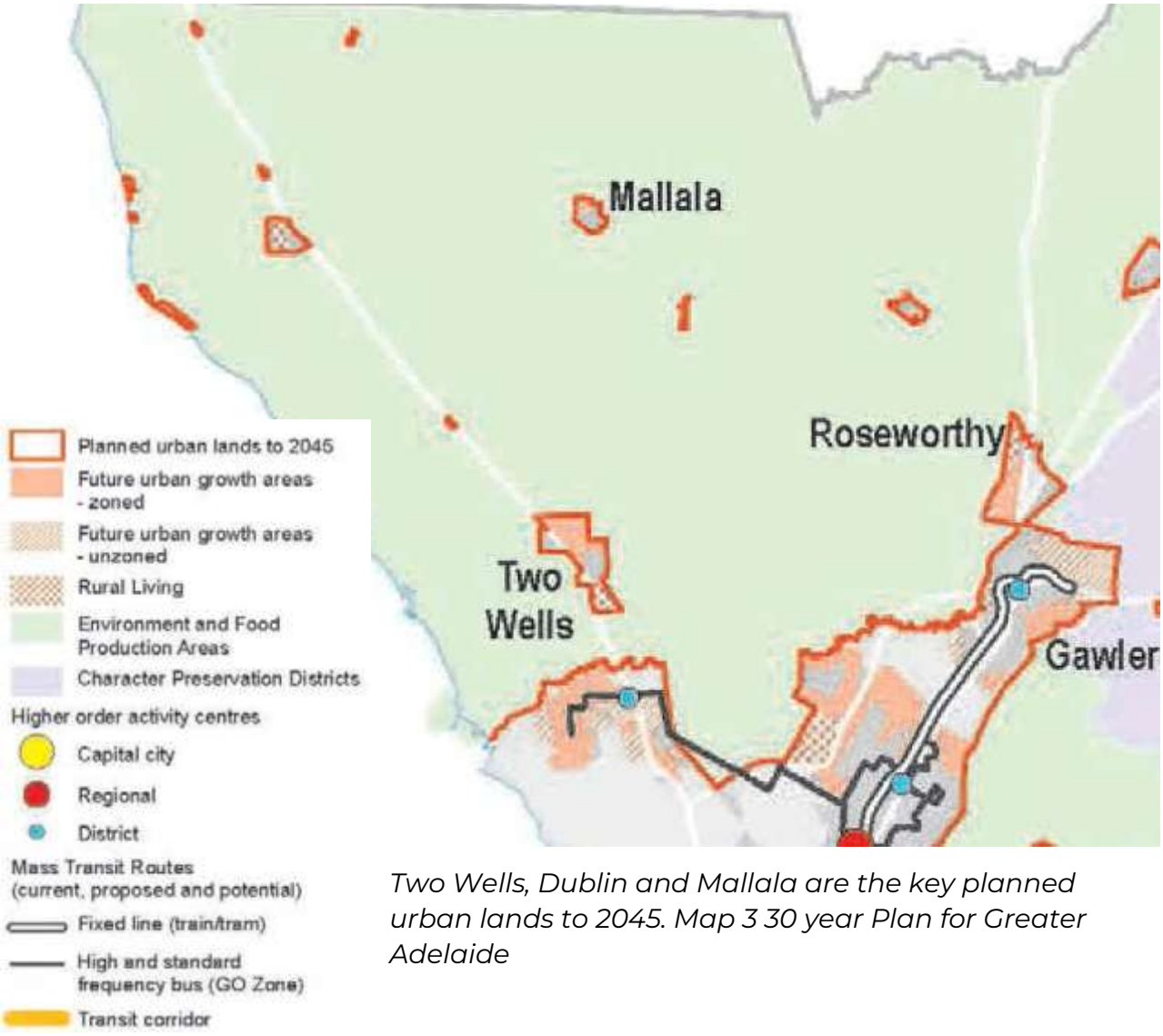



Two Wells/Lewiston is part of the Environment and Food Production Area and the Virginia Horticulture District. Map 3 30 year Plan for Greater Adelaide

[1] livingadelaide.sa.gov.au/

*Planned Urban Growth*

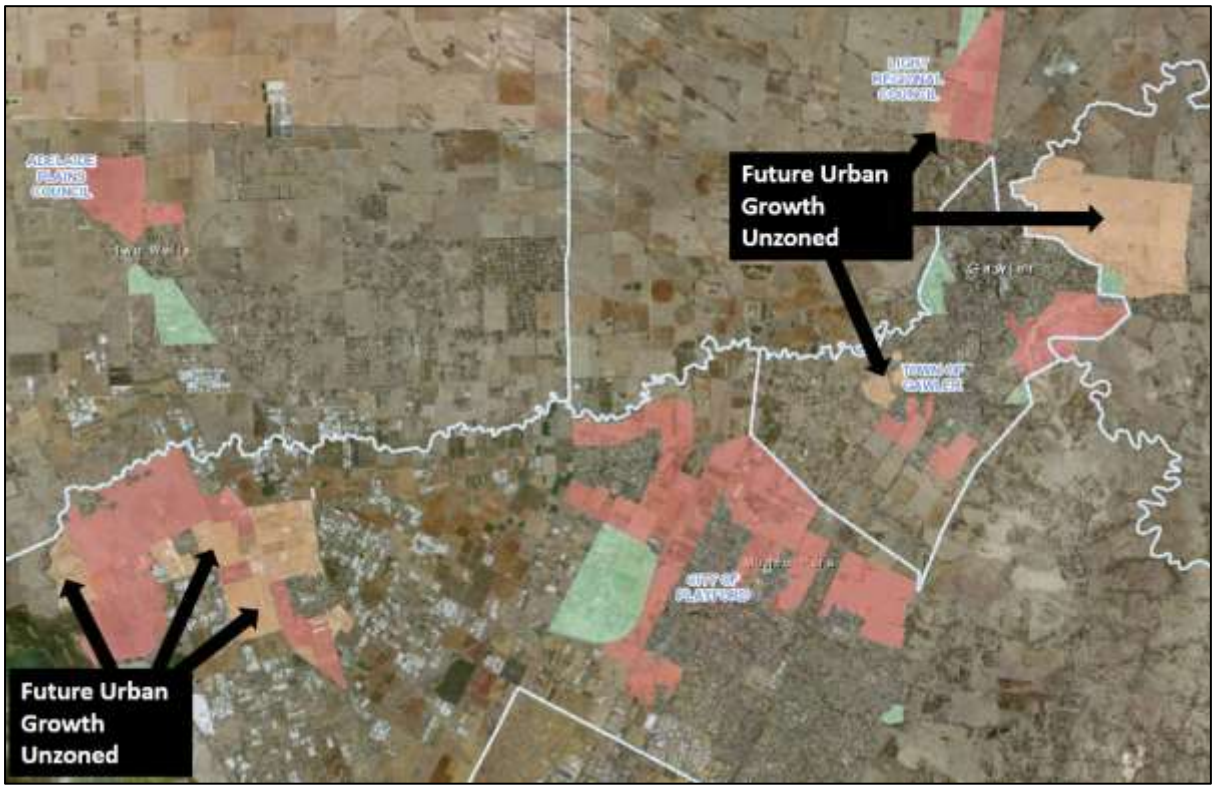
The 30 Year Plan identifies planned urban lands to 2045. This includes land already zoned and land to be zoned at some point in the future.




*Two Wells, Dublin and Mallala are the key planned urban lands to 2045. Map 3 30 year Plan for Greater Adelaide*

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.

| Investigations Undertaken Influencing Adelaide Plains | | | |
|---|---|---|---|
| | Economic Focus | Social Focus | Environmental Focus |
| 2022 | Tourism and Economic Development Strategy<br><br>Long Term Financial Plan | Equine Sector | Two Wells Traffic |
| 2021 | Planning and Design Code introduced | APC Office Accommodation (underway)<br><br>Public Health Regional<br><br>Heritage (underway)<br><br>Trails (proposed)<br><br>Cemetery Capacity | Gawler River flood study (underway) |
| 2020 | Two Wells CWMS Feasibility | Disability Access and Inclusion Plan<br><br>Aged Housing | Adelaide International Bird Sanctuary Management Plan<br><br>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<br><br>2W2W Economic Corridor Accelerating Regional Growth from Two Wells to Whyalla | | Gawler and Light River Floodplain Mapping<br><br>Two Wells Stormwater Management |
| 2015 | NAIS Market Proving (Arris)<br><br>Broadacre Farming | Lewiston Community Focal Points | |

| Investigations Undertaken Influencing Adelaide Plains | | | |
|---|---|---|---|
| | Economic Focus | Social Focus | Environmental Focus |
| | (Dublin township expansion - Minister declined to support)<br><br>Equestrian/Horse Keeping Precinct | | |
| 2014 | Mallala Township Development Plan Amendment<br><br>Two Wells Retail Demand<br><br>Strategic Directions (Development Act S30) | | Adaptation Frameworks for Middle Beach, Thompson Beach, Webb Beach and Parham<br><br>Two Wells Traffic Study |
| 2013 | Horticulture Framework<br><br>Horticulture Plains State of Play<br><br>Two Wells Residential Development Plan Amendment | | Coastal Settlements Adaptation |
| 2012 & earlier | | Heritage 1983 | Two Wells Main Street Design Guidelines 2011<br><br>Gawler River Open Space 2009<br><br>Mallala Transport 2005 |

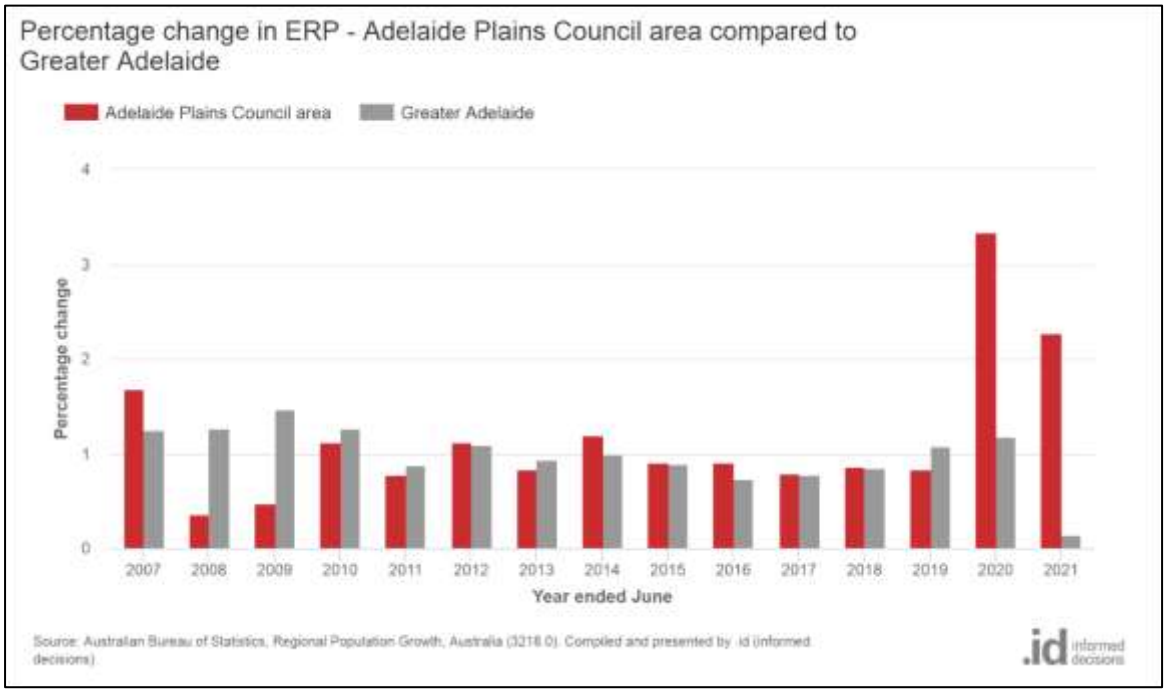
**Population and Development Trends**

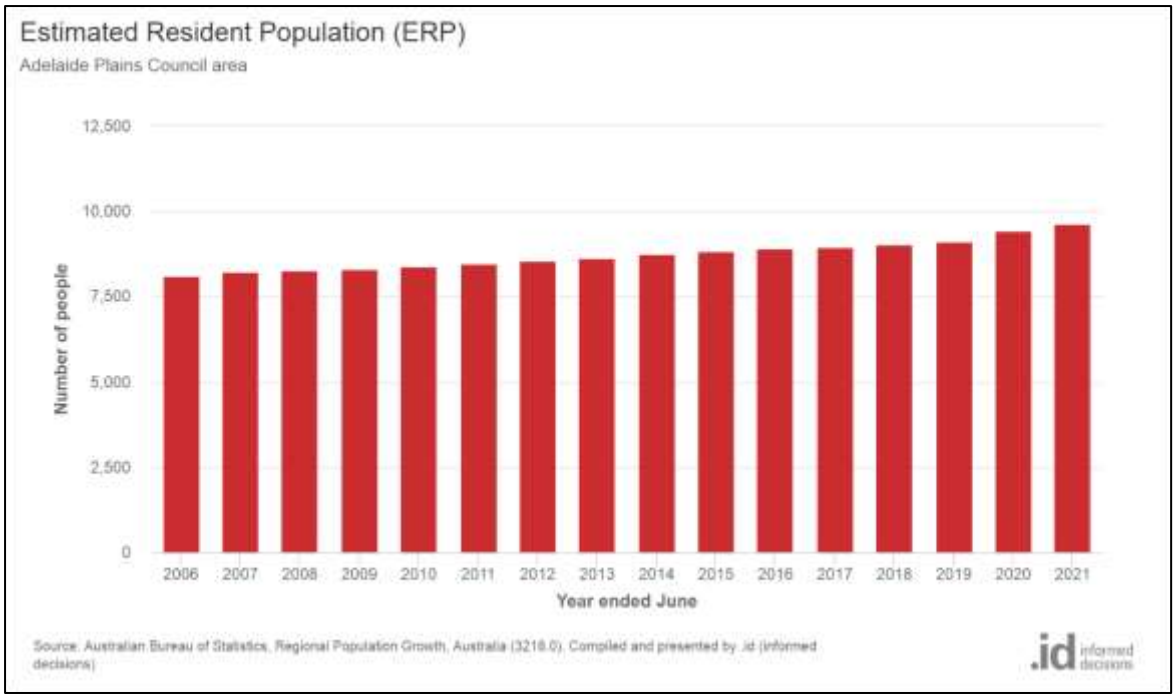
*Residents*

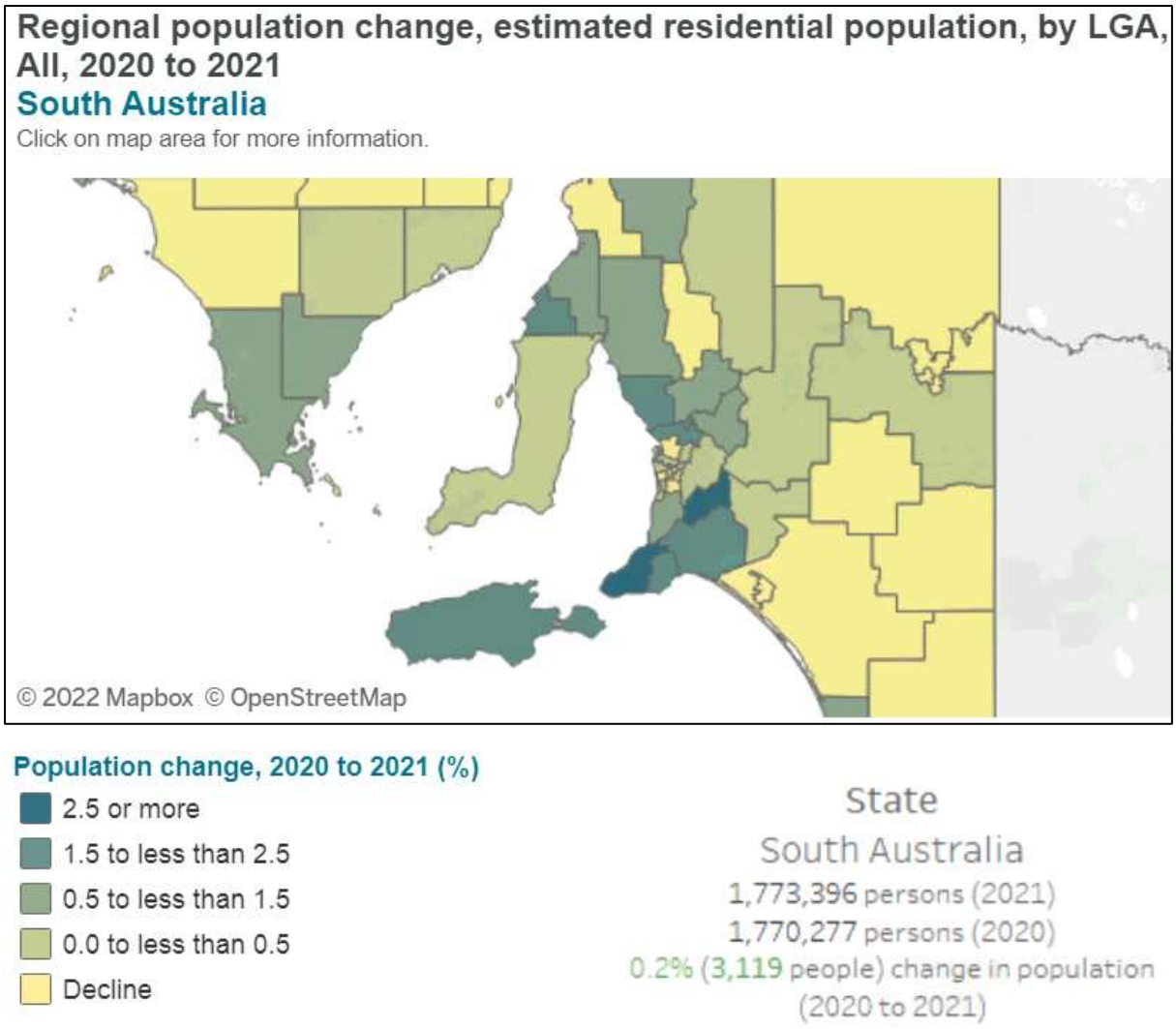
Council's residential population has grown steadily from around 8,100 in 2006 to an estimated 9,655 in 2021. When compared to Greater Adelaide, Adelaide Plain's rate of residential growth has mirrored Greater Adelaide's small increases, aside from being slightly greater in 2007 and 2014.

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 2020[2].

[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.

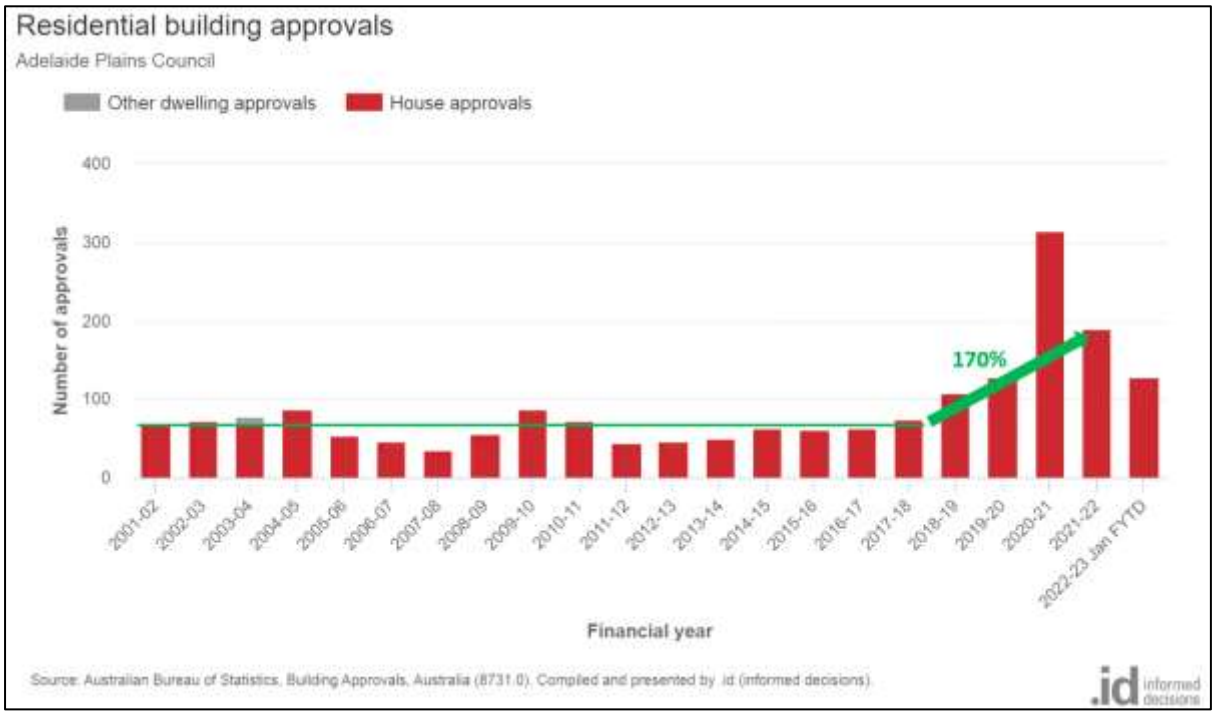
House approvals rose to 129 in 2019-20, 314 in 2020-21 and 189 in 2021-22.

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<br>84% greater than 70 dwellings/annum typical 2001 - 2018 | 314<br>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 Regions[3]

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

*Value of Approvals*

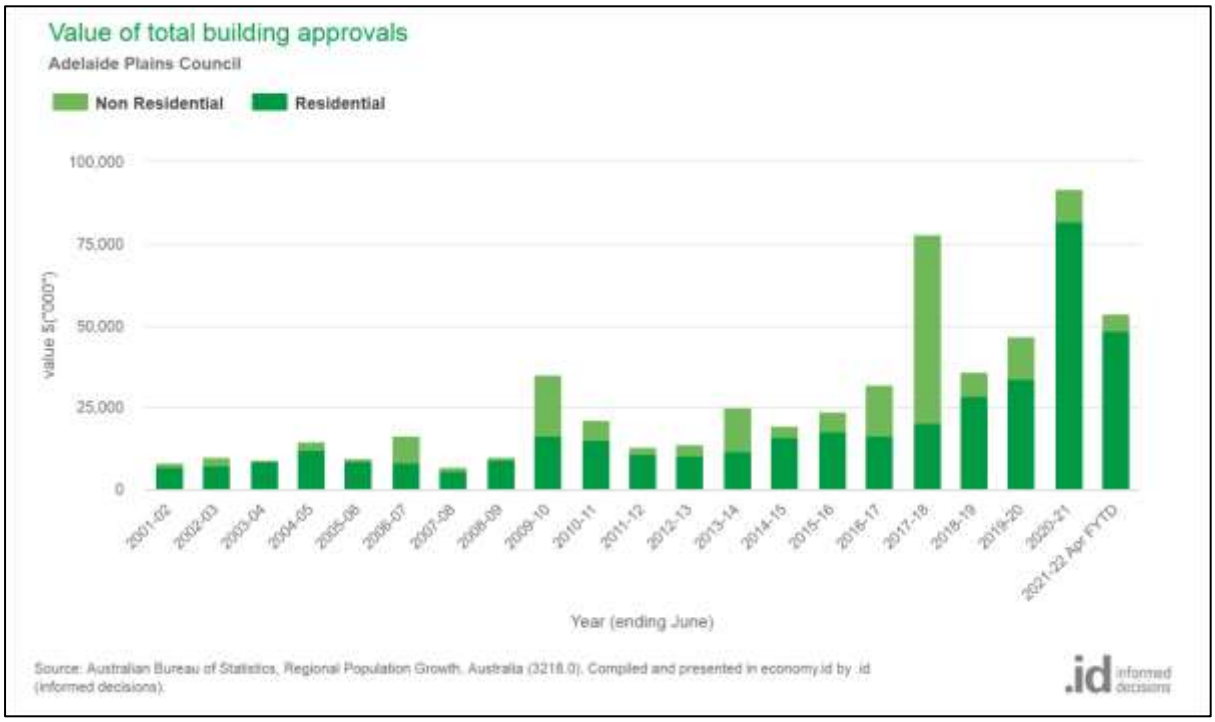
Value has typically been between $10M and $25M per annum. From 2016-17, value began to increase to around $30M.

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.

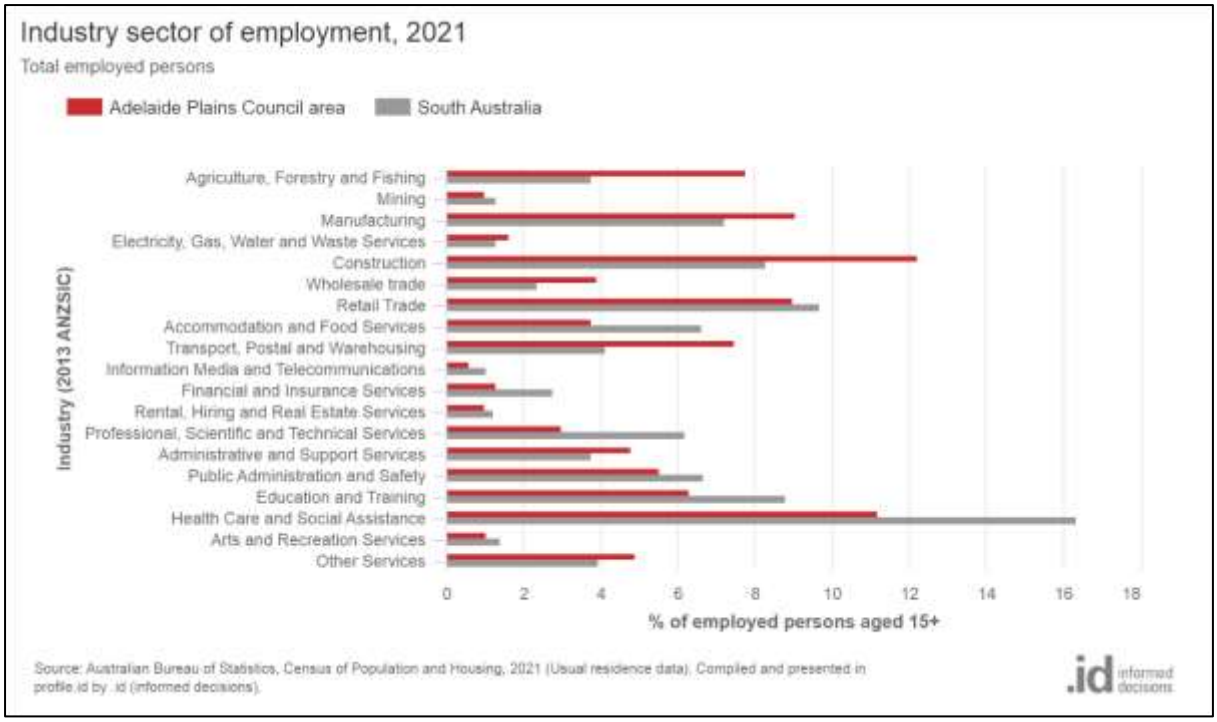
As a % of SA jobs, Adelaide Plains local jobs have increased from 0.19% in 2006 to 0.35% in 2021. More residents are working in construction, administration, education, health care and other services.

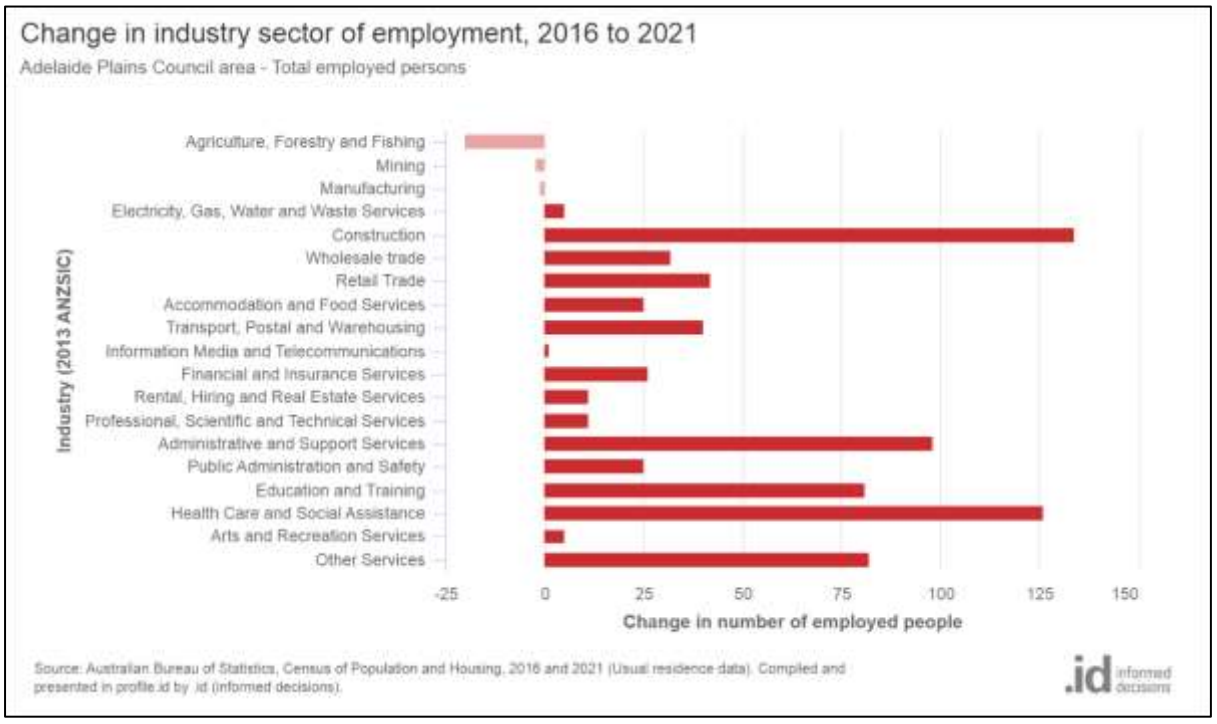
Local jobs

reset export

| | 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 |

Source: Australian Bureau of Statistics. Australian National Accounts:National Income, Expenditure and Product , catalogue number 5206.0, and the National Institute of Economic and Industry Research (NIEIR) ©2019. Compiled and presented in economy.id by .id (informed decisions)
Please refer to specific data notes for more information


Industry sector of employment, 2021
Total employed persons
Adelaide Plains Council area
South Australia
Industry (2013 ANZSIC)
Agriculture, Forestry and Fishing
Mining
Manufacturing
Electricity, Gas, Water and Waste Services
Construction
Wholesale trade
Retail Trade
Accommodation and Food Services
Transport, Postal and Warehousing
Information Media and Telecommunications
Financial and Insurance Services
Rental, Hiring and Real Estate Services
Professional, Scientific and Technical Services
Administrative and Support Services
Public Administration and Safety
Education and Training
Health Care and Social Assistance
Arts and Recreation Services
Other Services
0
2
4
6
8
10
12
14
16
18
% of employed persons aged 15+
Source: Australian Bureau of Statistics, Census of Population and Housing, 2021 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).
.id informed decisions


Change in industry sector of employment, 2016 to 2021
Adelaide Plains Council area - Total employed persons
Industry (2013 ANZSIC)
Agriculture, Forestry and Fishing
Mining
Manufacturing
Electricity, Gas, Water and Waste Services
Construction
Wholesale trade
Retail Trade
Accommodation and Food Services
Transport, Postal and Warehousing
Information Media and Telecommunications
Financial and Insurance Services
Rental, Hiring and Real Estate Services
Professional, Scientific and Technical Services
Administrative and Support Services
Public Administration and Safety
Education and Training
Health Care and Social Assistance
Arts and Recreation Services
Other Services
-25
0
25
50
75
100
125
150
Change in number of employed people
Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 and 2021 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).
.id informed decisions

*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.

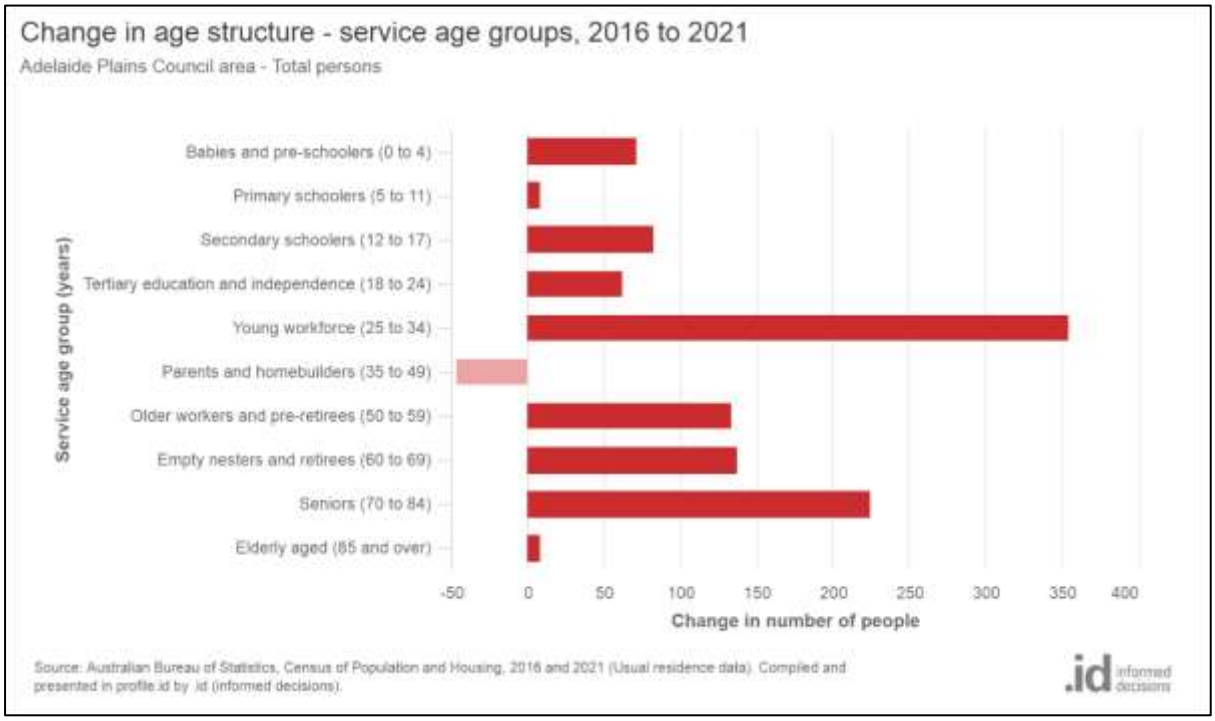
In 2021, the largest age group was 55 to 59 year olds. The group that changed the most since 2016 was 25 to 34 year-olds, increasing by 355 people.

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

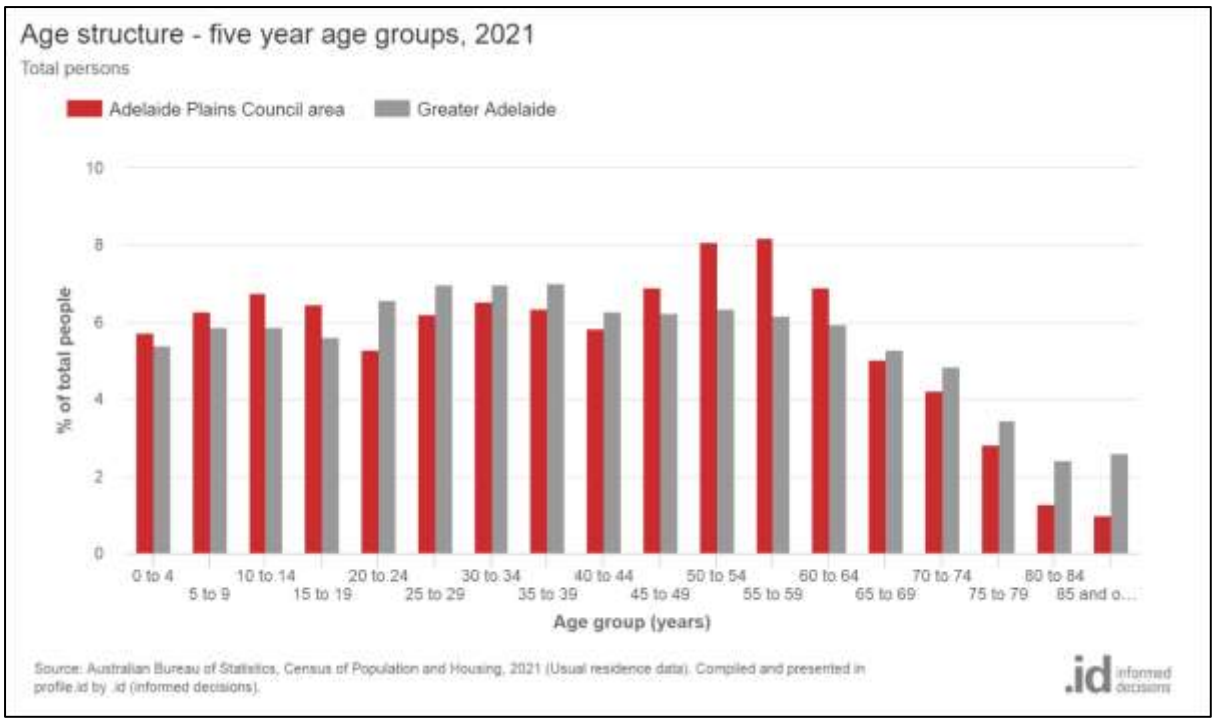
- 25 to 34 (+355 persons)
- 70 to 84 (+225 persons)

The major differences between Adelaide Plains and Greater Adelaide were:

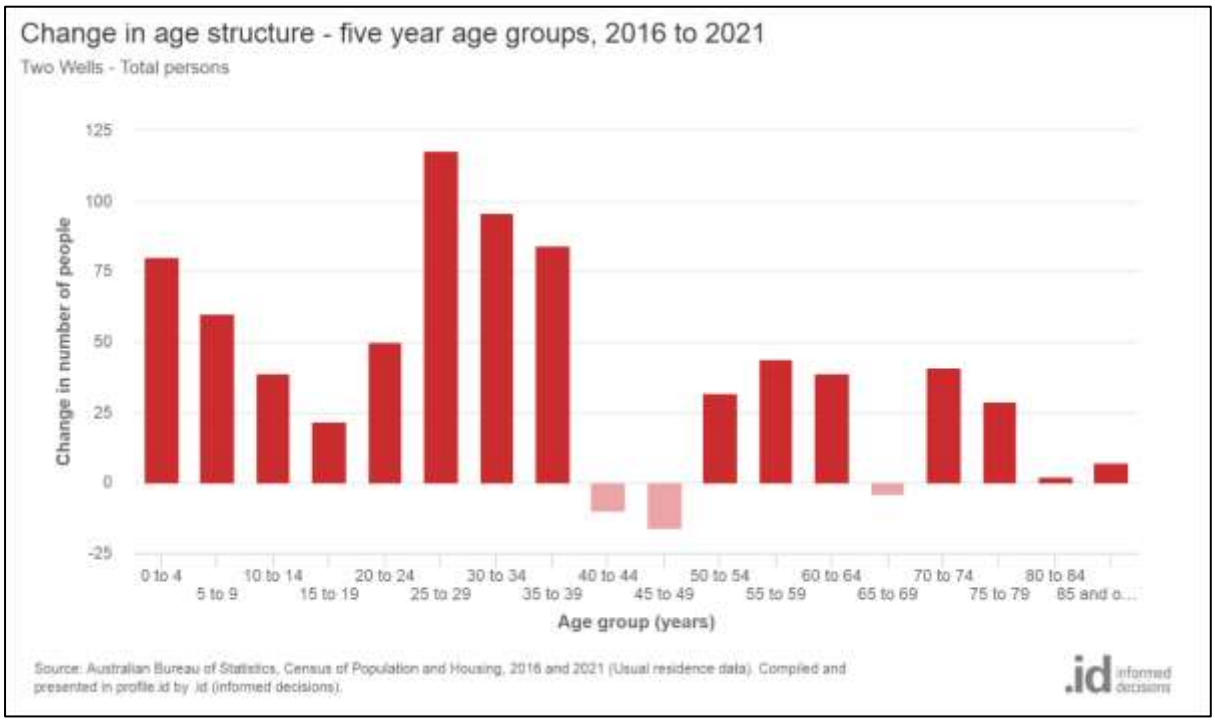
- A larger percentage of 'Older workers & pre-retirees' (16.3% compared to 12.6%)
- A larger percentage of 'Secondary schoolers' (8.3% compared to 6.9%)
- A smaller percentage of 'Seniors' (8.4% compared to 10.7%)
- A smaller percentage of 'Frail aged' (1.0% compared to 2.6%)



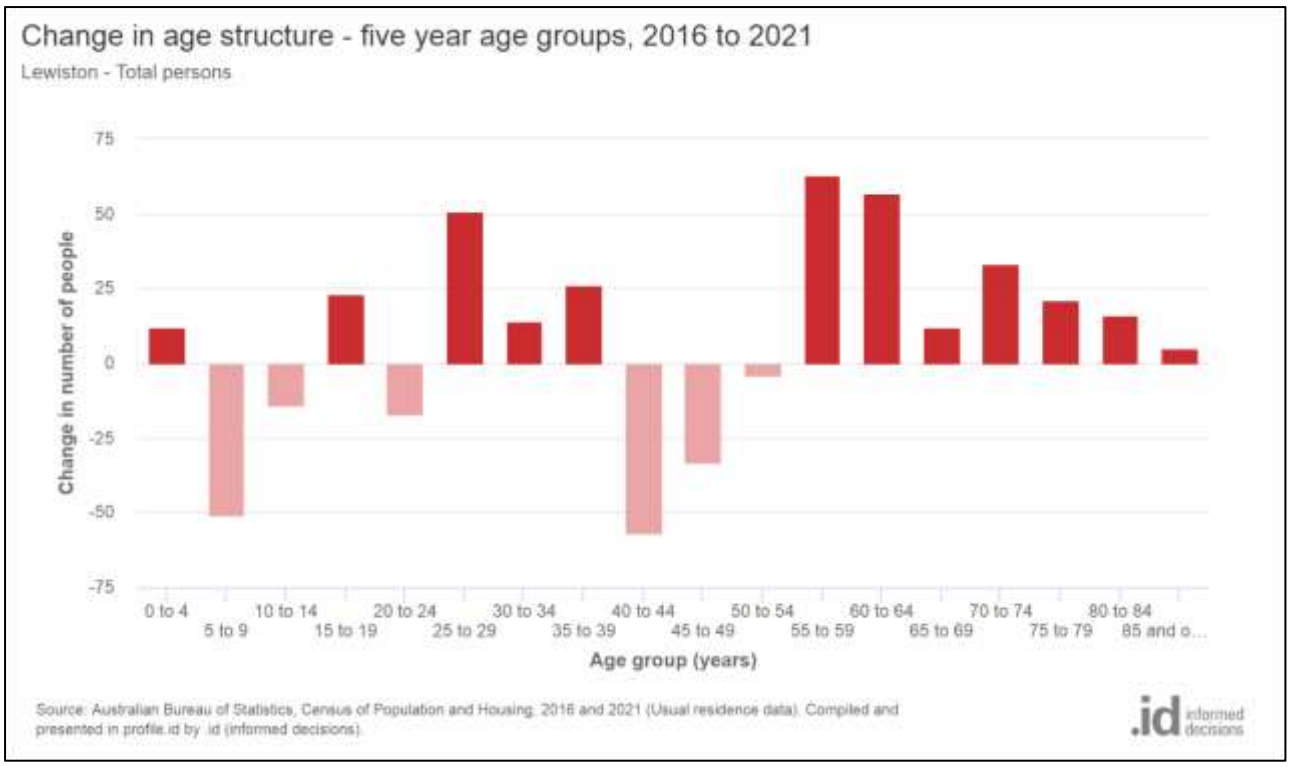

*Adelaide Plains experienced growth in younger and family rearing ages as well as what can be called empty nesters (2016-2021)*



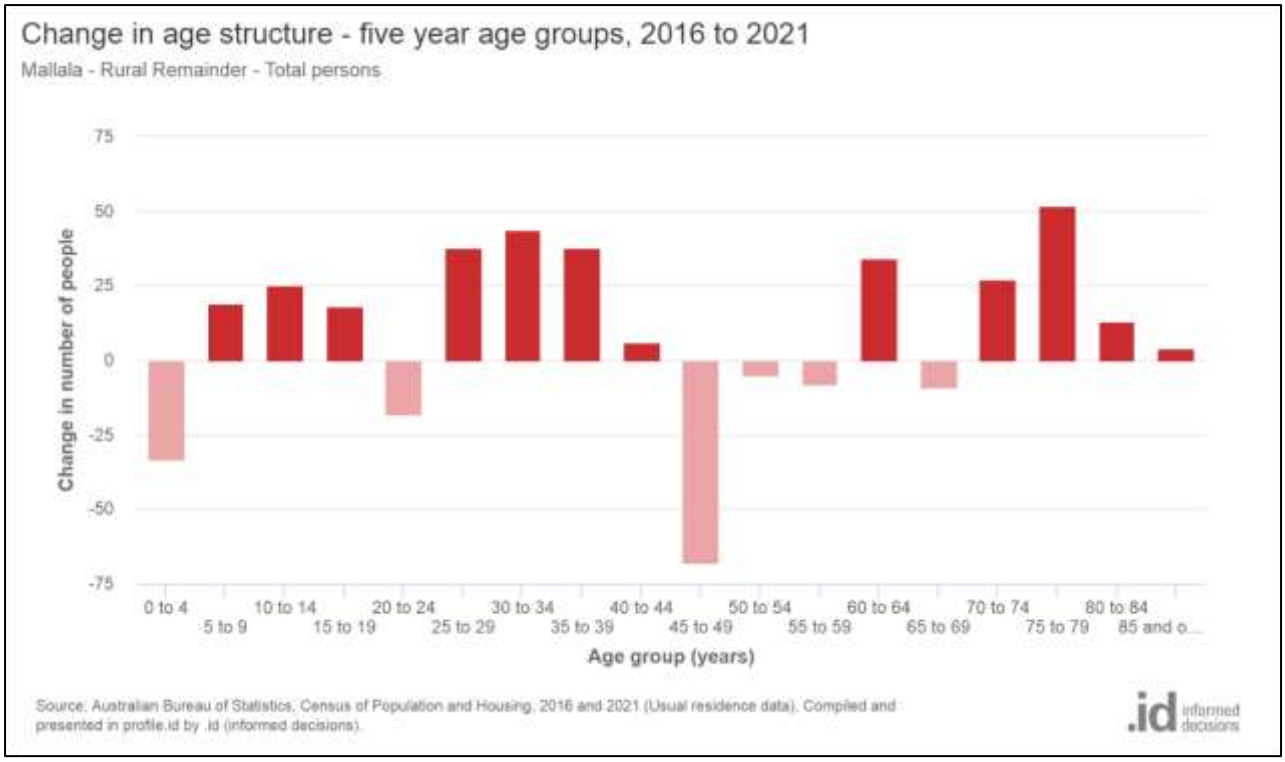

*Compared to Greater Adelaide, Adelaide Plains has higher proportion of children, youth and empty nesters, and lower proportion of family rearing age, and retirees (2016-2021)*



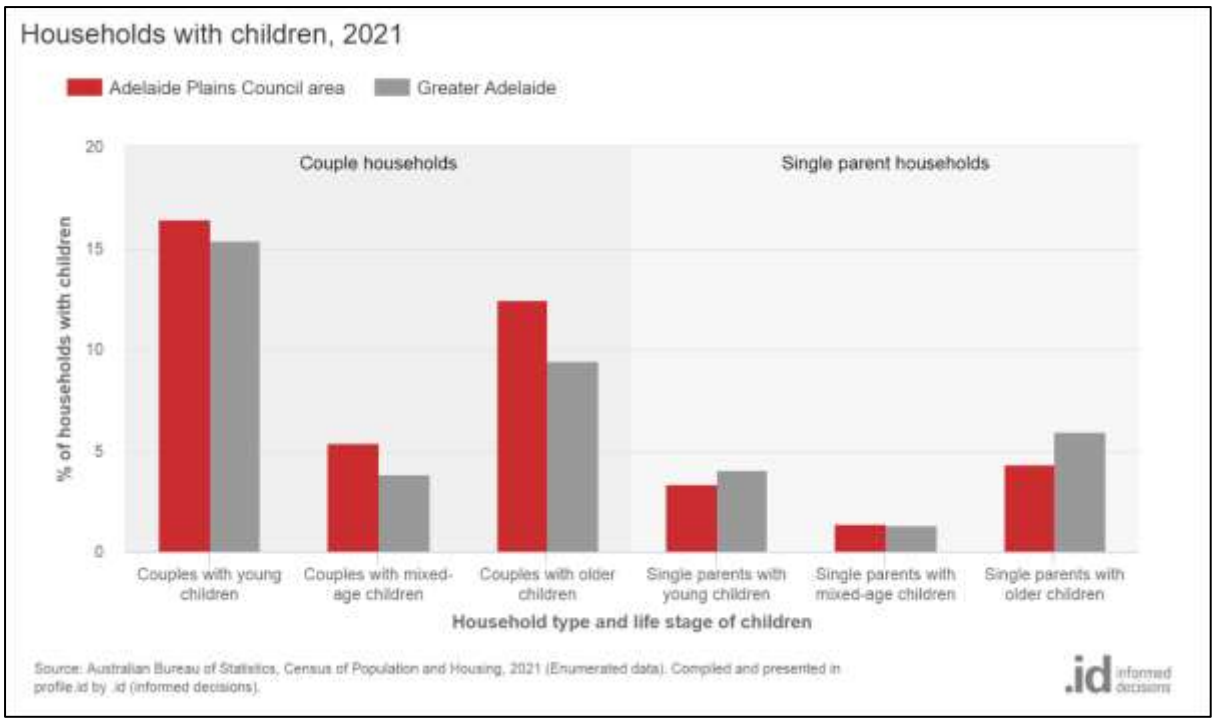

*Two Wells from 2016 – 2021 has experienced growth in children, young adults, family rearing age, empty nesters and older retirees.*



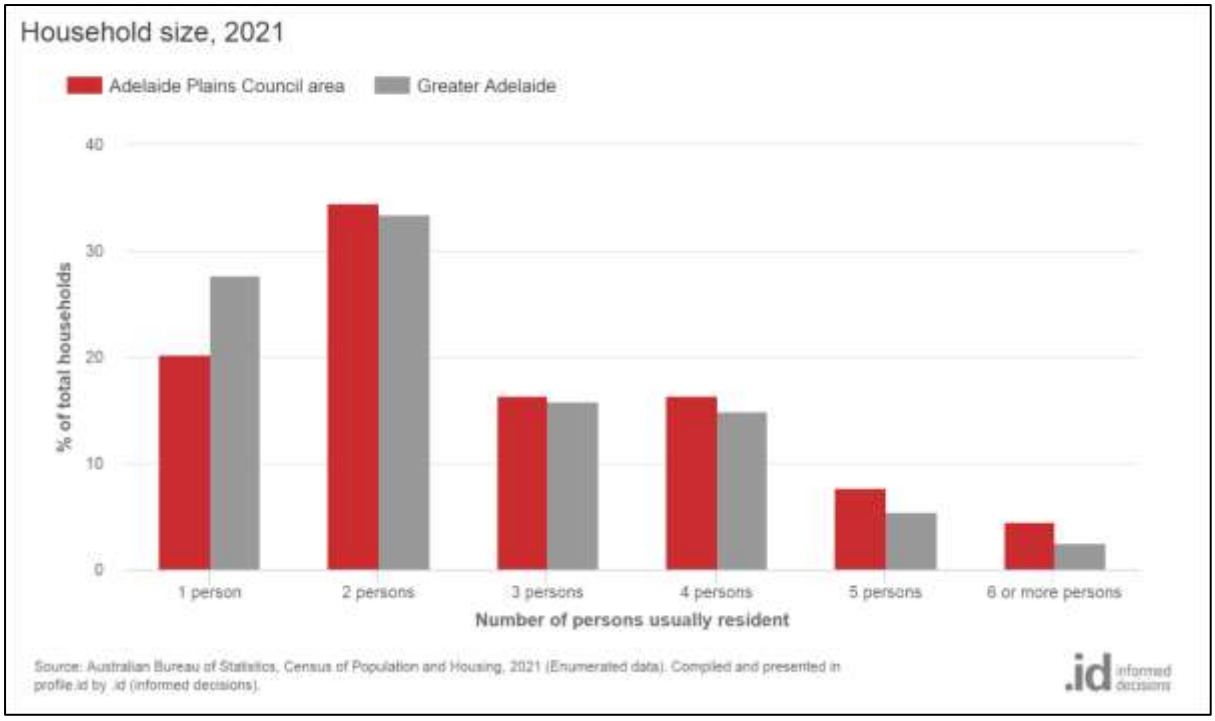

*Lewiston from 2016 – 2021 has experienced growth in family rearing age, empty nesters and retirees, and a decline in children and mature family age*




*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*

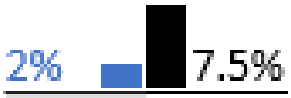
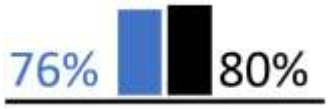
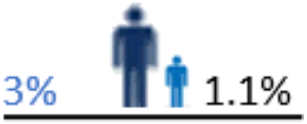



*Compared to Greater Adelaide, Adelaide Plains has a lower proportions of single person households*

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.

<table>
<tr><td colspan="3">Adelaide Plains / Greater Adelaide based on ABS</td></tr>
<tr><td>WORK<br>(Unemployment rate)<br>2021<br> </td><td>HOUSEHOLDS (2021)<br>Family<br> <br>Lone Person<br> <br>Group Households<br> </td><td>PEOPLE<br>0 – 24 years (2016 – 2040)<br><br>(no data)</td></tr>
<tr><td rowspan="2"></td><td rowspan="2"></td><td>PEOPLE<br>25 – 64 years (2016 – 2040)<br><br>(no data)</td></tr>
<tr><td>CARS<br>No motor vehicle (2021)<br>  </td><td>DWELLINGS<br>Separate House<br> <br>Medium Density Dwellings<br> </td><td>PEOPLE<br>65+ (2016 – 2040)<br><br>(no data)</td></tr>
<tr><td>INTERNET<br>Internet at Home (2016)<br>  </td><td rowspan="3">POPULATION<br> <br>People (2021)<br> <br>Estimated Population (2040)<br><br>FORECAST GROWTH<br>(% average annual change)<br>  </td><td>LANGUAGE<br>Speak a language other than English at home (2021)<br> </td></tr>
<tr><td>VOLUNTEER<br>Residents who did voluntary work (2021)<br> </td><td>ECONOMIC<br>Low Income Households (2021)<br> <br>Rent <$304/week (2021)<br> </td></tr>
<tr><td>RELATIVE DISADVANTAGE<br> </td><td></td></tr>
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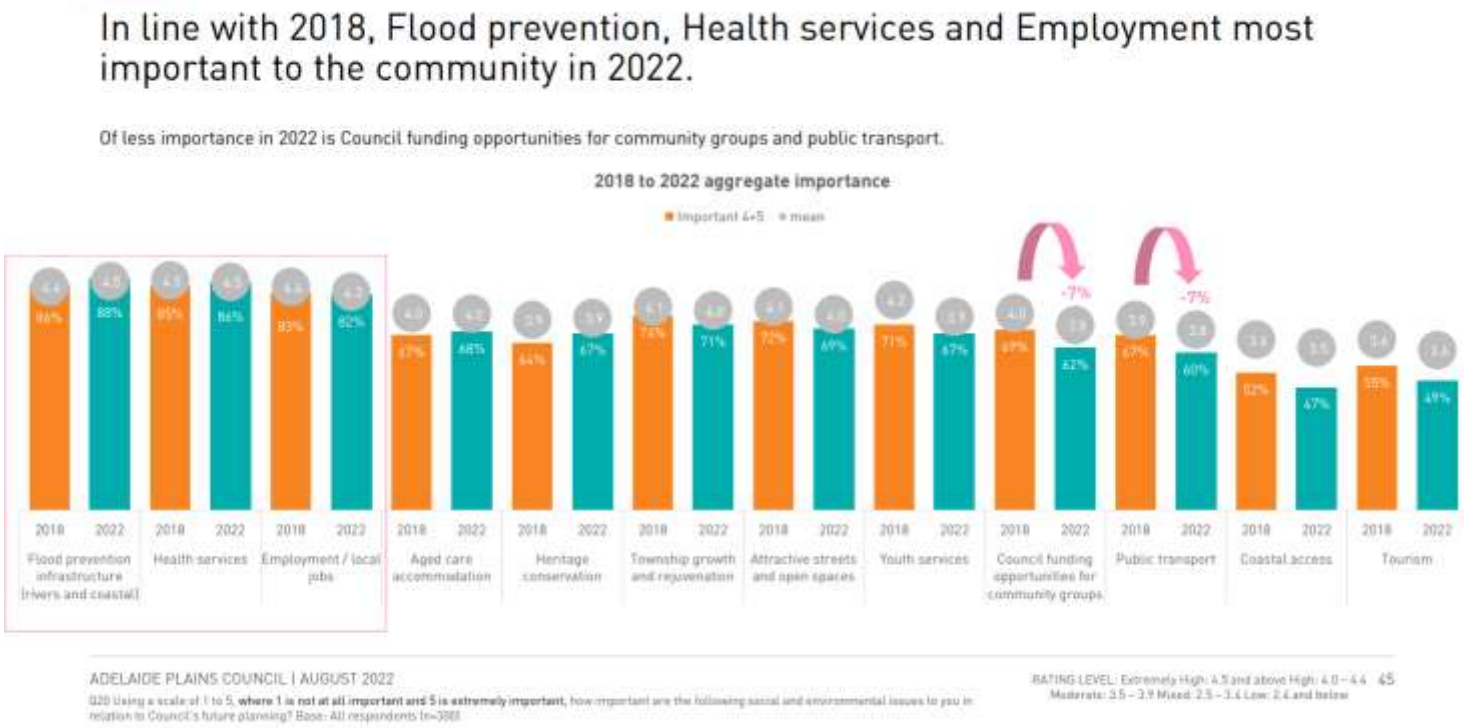
**Resident Satisfaction**




The 2022 residents survey[4] affirmed the importance of planning for hazards, for health services, and employment.

A similar survey was underway in 2018.

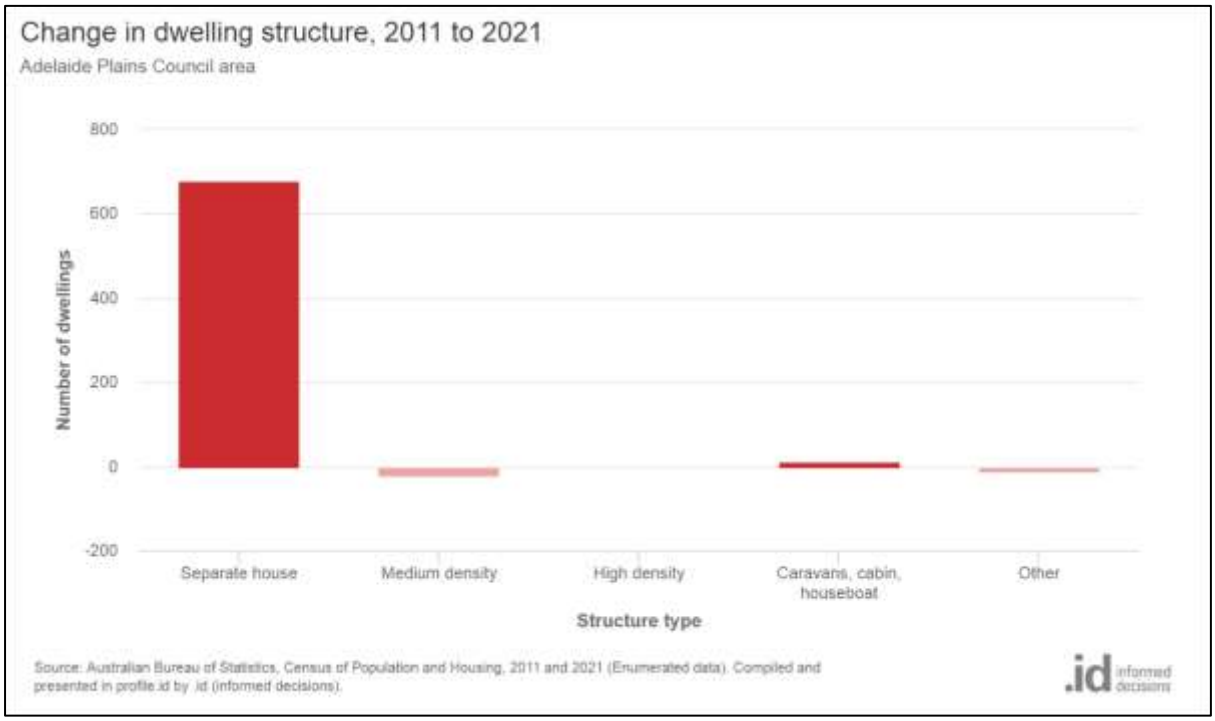
[4] PowerPoint Presentation (apc.sa.gov.au)

**Housing**

The provision of affordable and suitable housing is part of the objectives within the SA Housing Authority's Our Housing Future 2020 – 2030[5] 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.

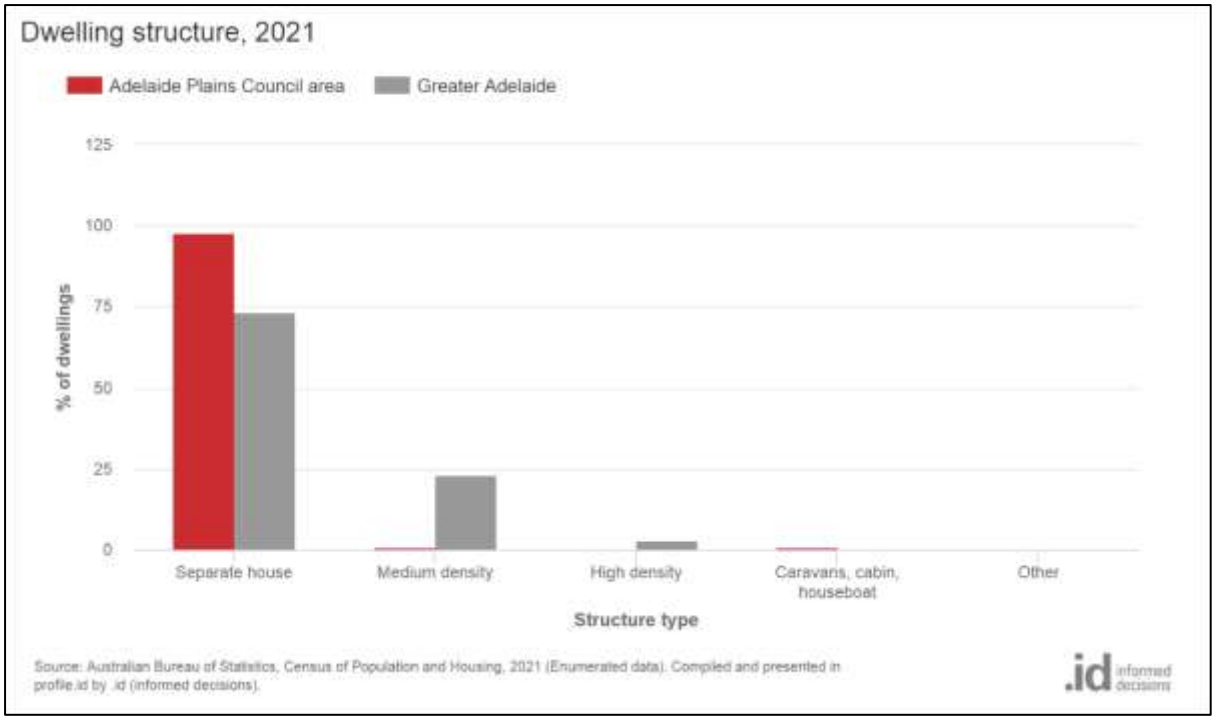
A growing population also has clear implications on requirements for additional housing and services. Council is responsible for rezoning additional land for residential development and is responsible for some of the social and community services along with State and Australian Government service departments.

SA Housing Authority has units in Two Wells. A Local Affordable housing plan toolkit[6] is available.

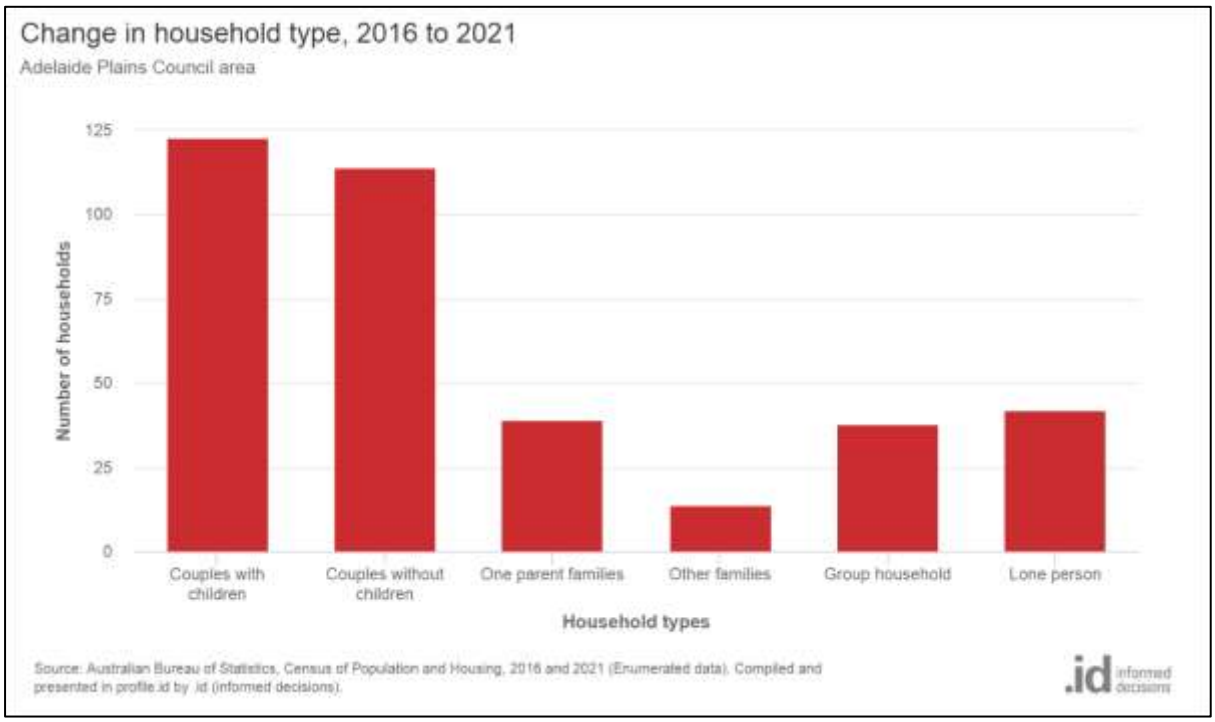



Across Adelaide Plains, from 2011 – 2021, growth in separate houses has been dominant, with a decline in medium density housing

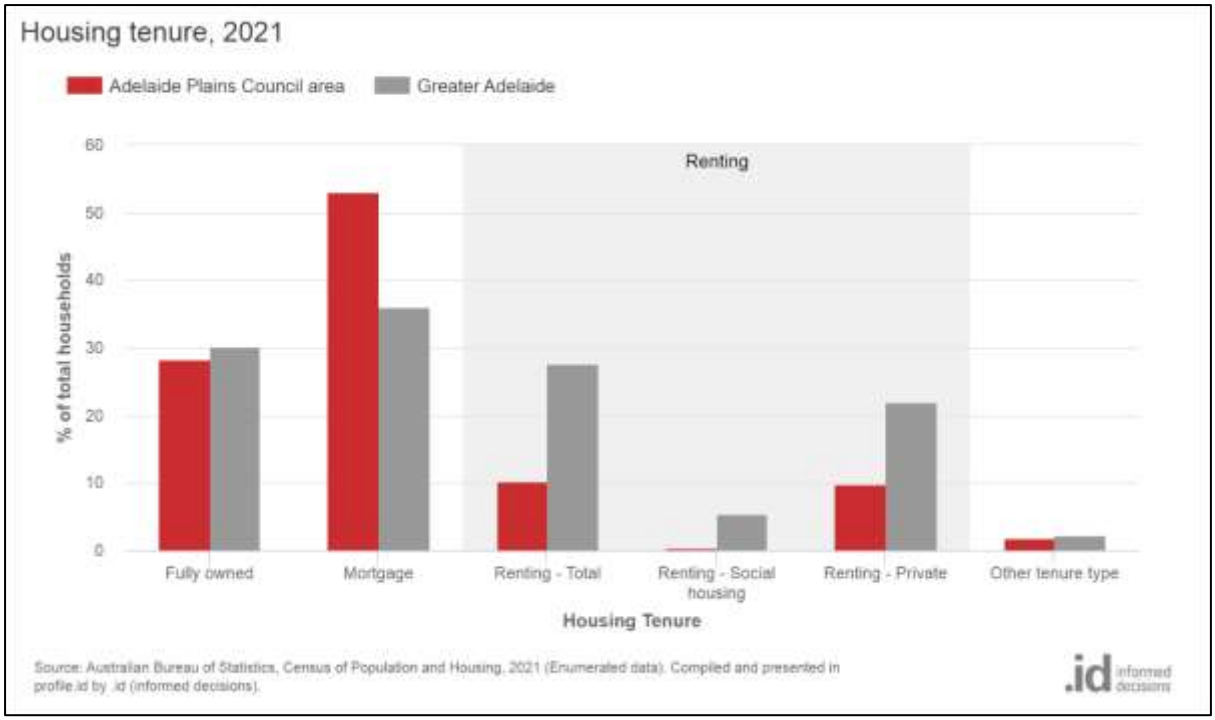
[5] housing.sa.gov.au/our-housing-future
[6] housing.sa.gov.au/documents/general/Local-Affordable-Housing-Plan-Toolkit.pdf



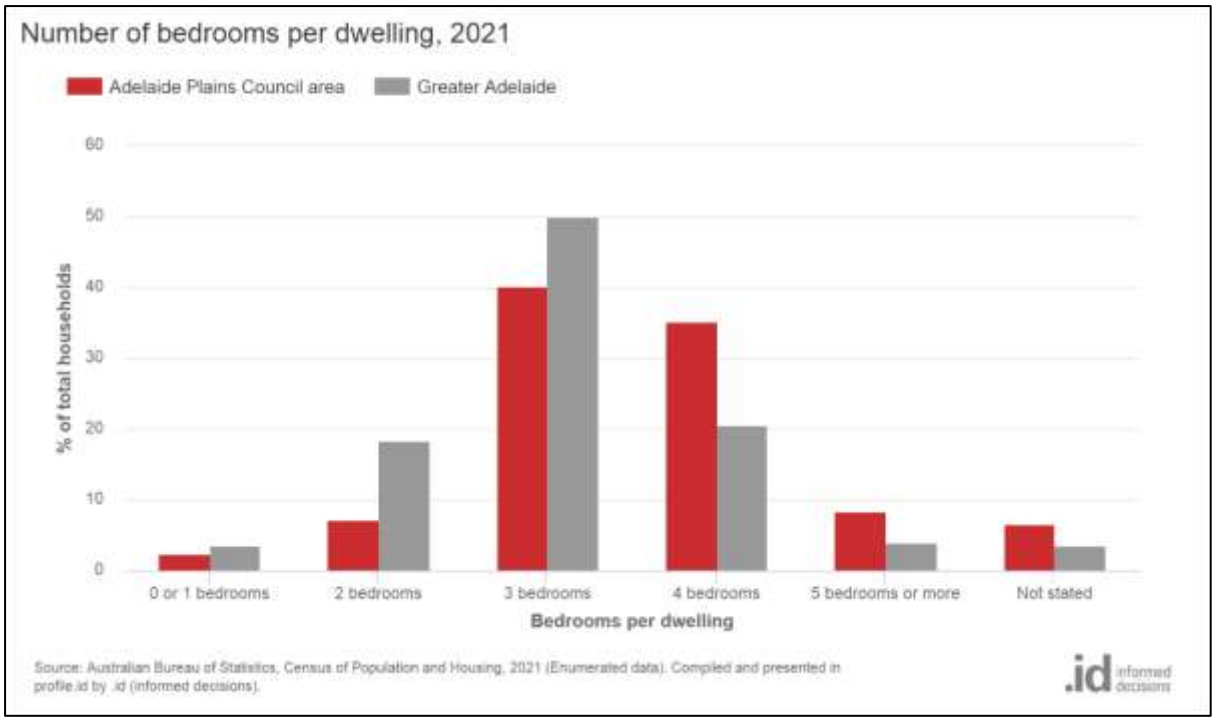

*Compared to Greater Adelaide, Adelaide Plains is dominated by separate houses, with negligible other forms of housing.*




*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 review[7] 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 housing[8]. Several providers specialise in seasonal housing, be it through regular housing managed and available for seasonal workers or through temporary seasonal workers accommodation.

Amended regulations[9] 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
[9] plan.sa.gov.au/news/article/2021/new_regulations_fast_track_temporary_accommodation_for_seasonal_workers

**Towns and Settlements**

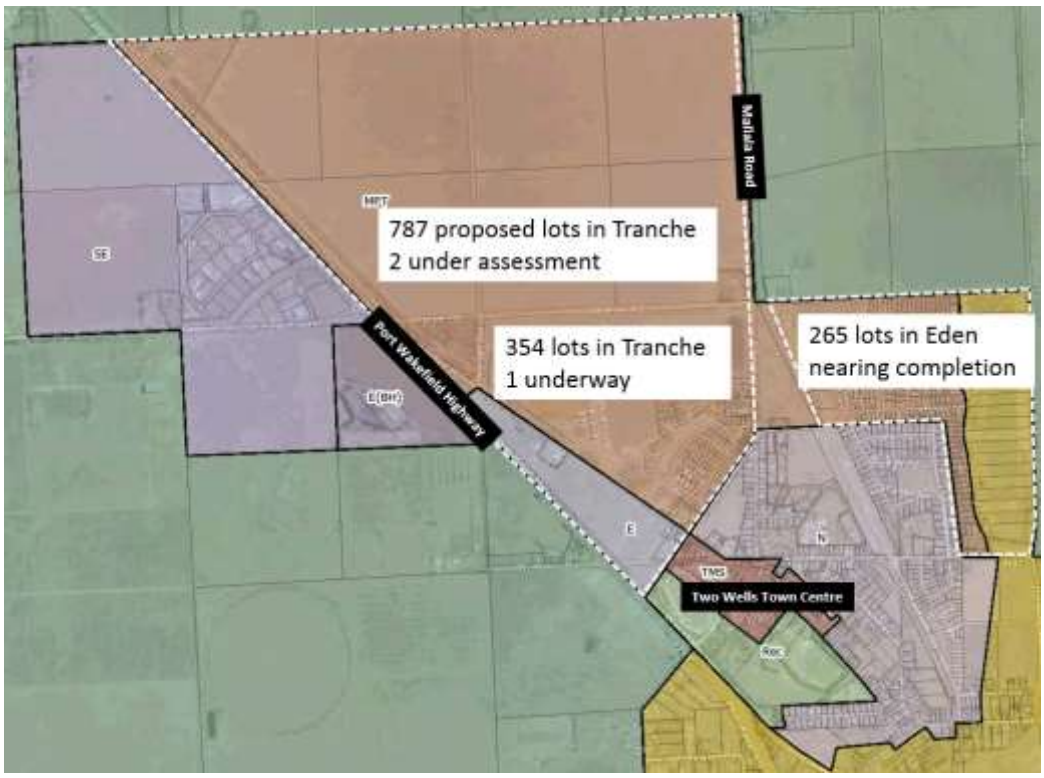
*Two Wells*

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 Deed[10] 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 Masterplan[11].

The 2020 Plan builds on the investigations and engagement captured in the 2011 Master Plan[12], 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

[11] 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

facilities[13]. 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.

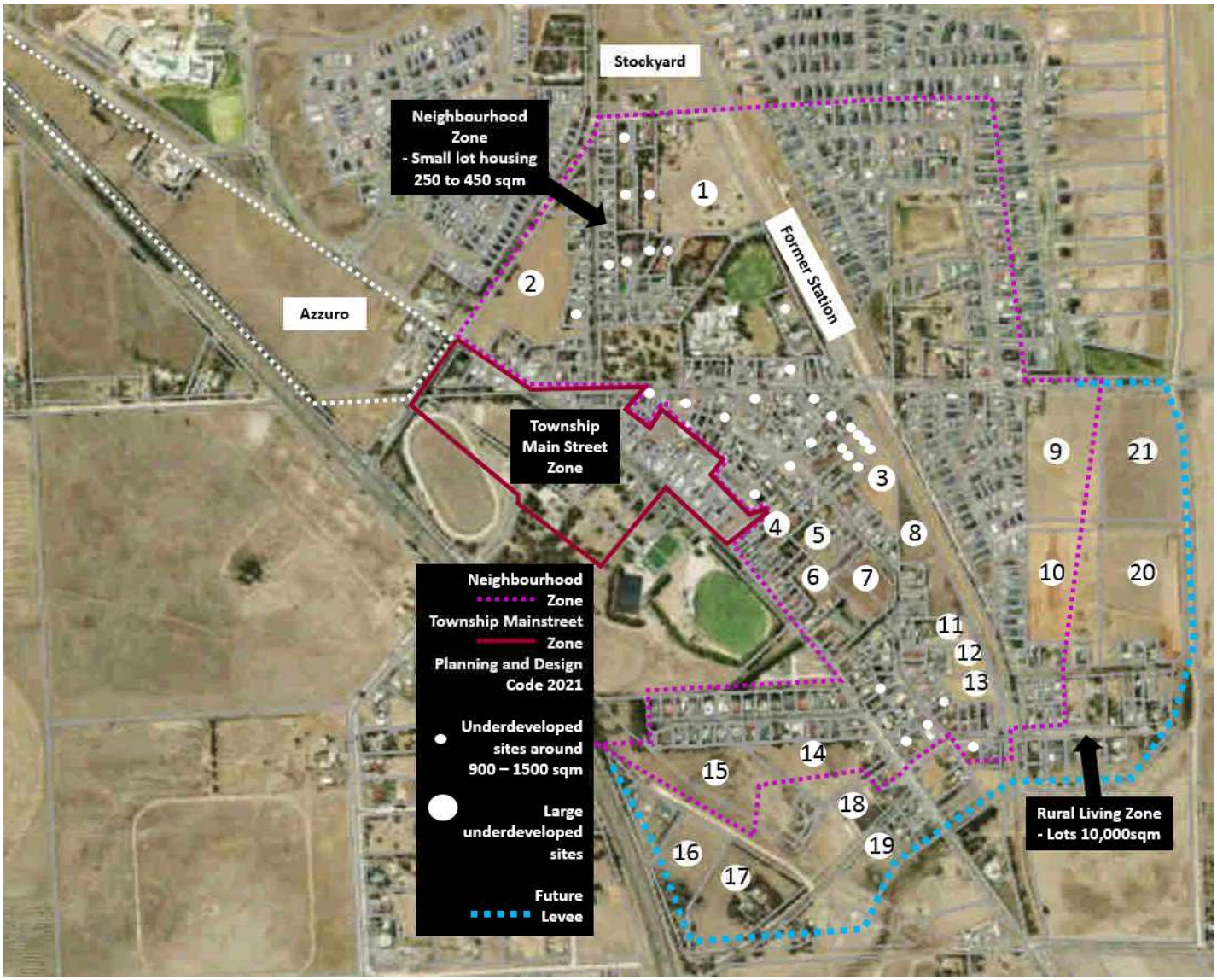
| Dwelling Type | Minimum Site Area (sqm) | Minimum Site Frontage (m) |
|---|---|---|
| Neighbourhood Zone | | |
| Detached Dwelling | 450[1] | 15 |
| Semi-Detached<br>Row Dwellings (minimum of three) | 300[1] | 10 |
| Group Dwelling (needs two or more) | 350[1] | 20 |
| Residential Flat Building (needs two or more) | 250[1] | 20 |
| Ancillary Accommodation (on the same site as another dwelling) | - | - |
| Retirement Facility<br>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.

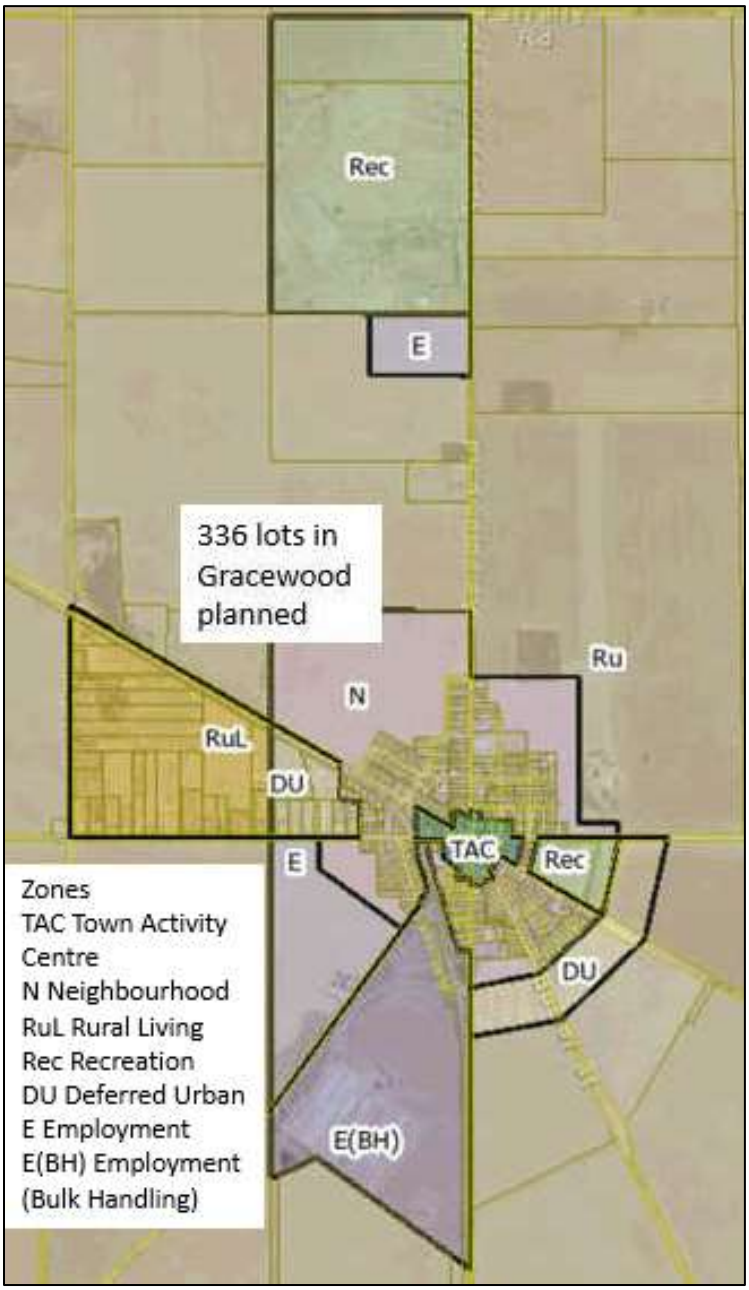
In 2014, the Mallala Township (Transport, Commercial and Minor Residential Zones Boundary Adjustment) Development Plan Amendment was approved. This rezoned 42HA for residential purposes and 22HA as deferred urban.

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.

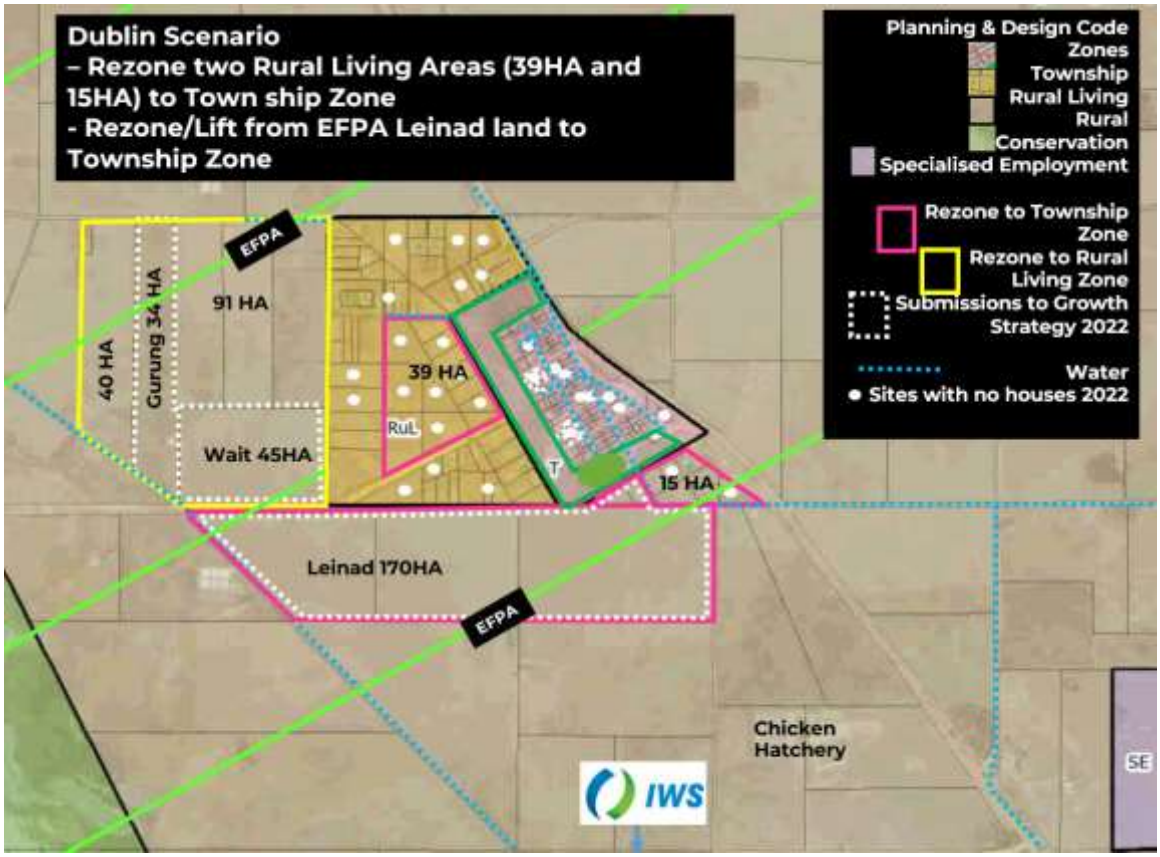
Under the scenario proposed in submissions by Leinad, Gurung and Wait:

- 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:

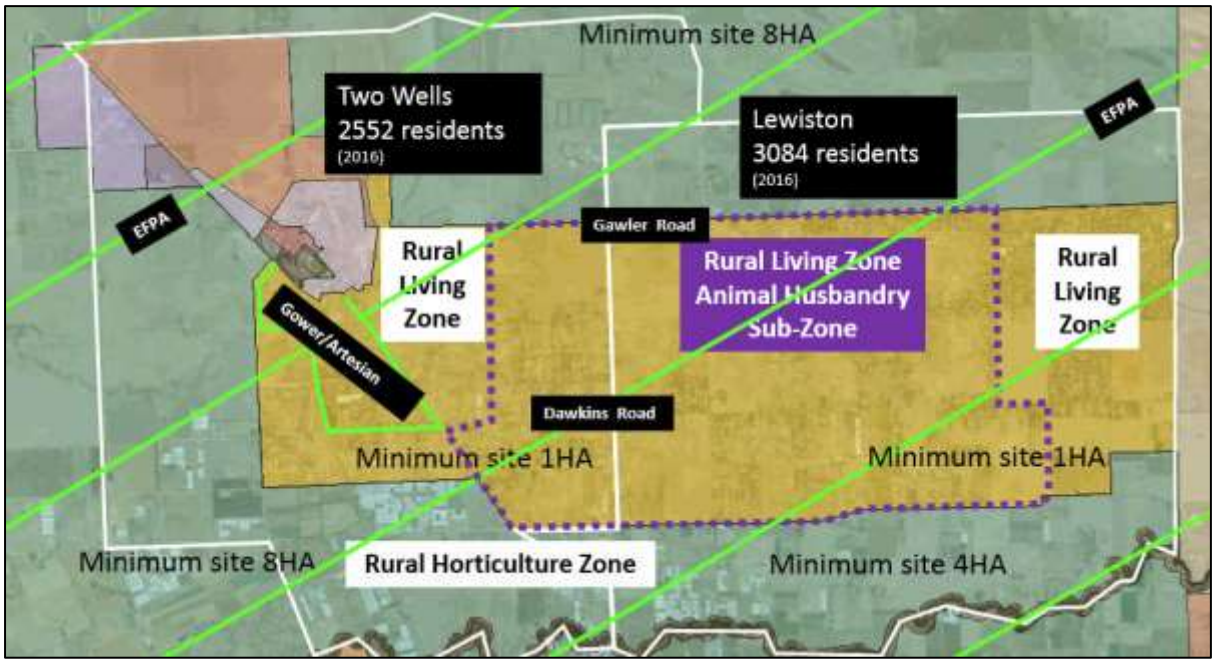
- opportunities to grow tourism and business experiences
- need for land supply release for housing, including rural living as transition to agriculture. Assessment of value of soil for food production and environmentally needs consideration
- potential for conflict with established uses, such as the 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 2016[14].

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*

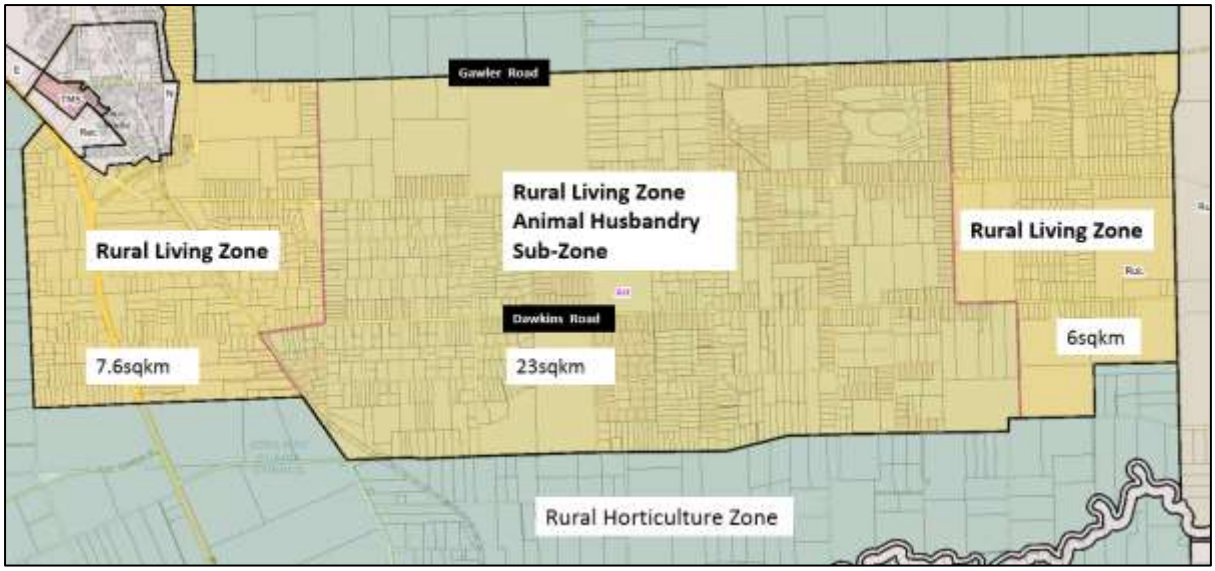
Planning and Design Code

The Planning and Design Code[15] 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:

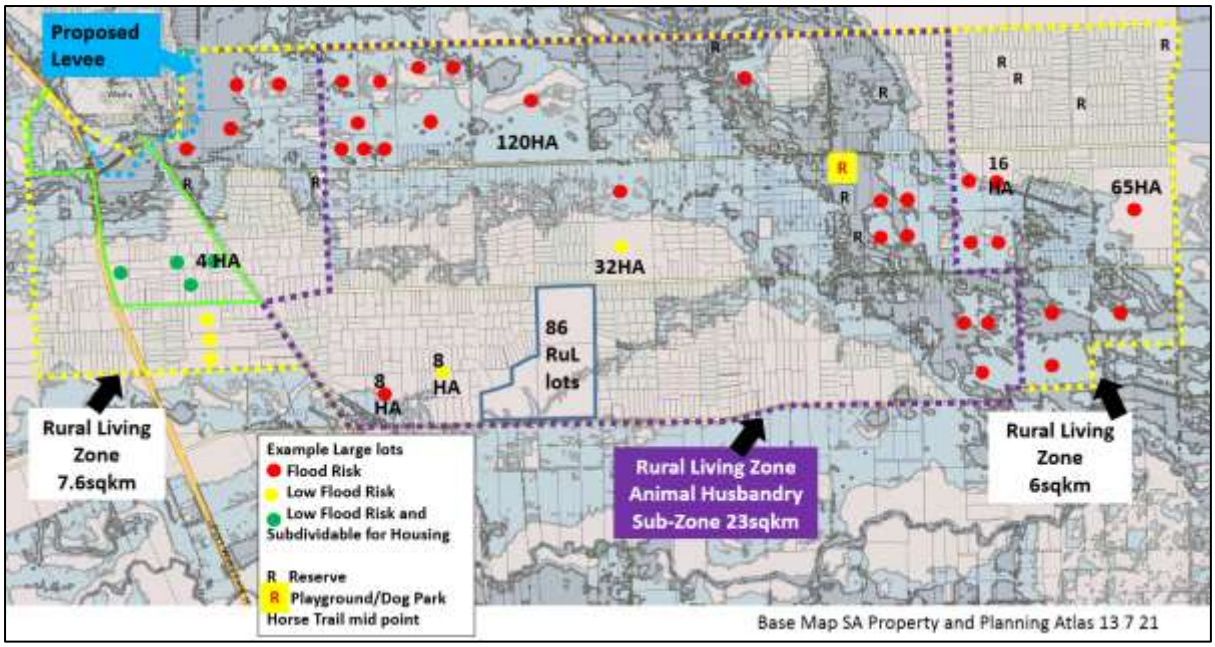
- Minimum site area is 1HA
- Residential development associated with animal keeping, shops up to 50sqm, or with light industry up to 100 sqm
- Division for residential living

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 submission[16] 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 |
| | | Using ABS 'State Suburb' which includes districts around each settlement | |
| | 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*

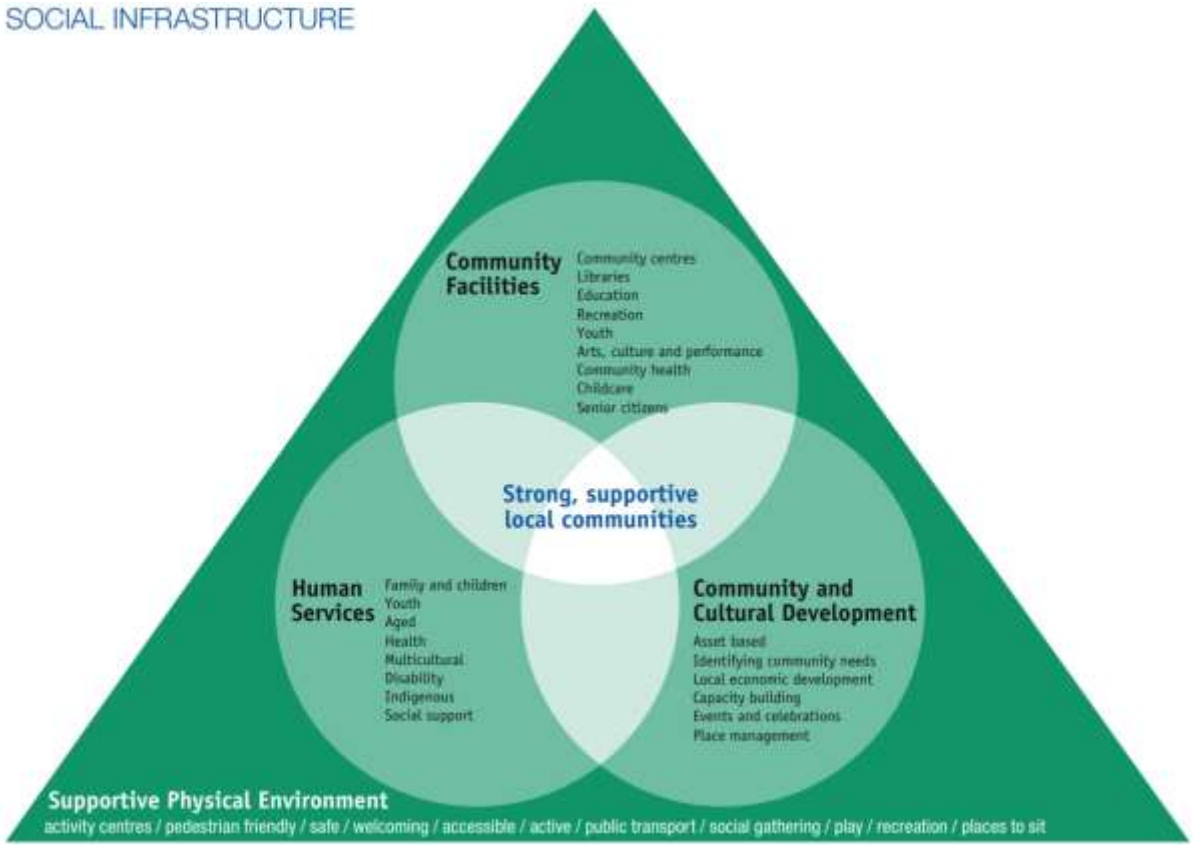
Overview of Existing Social Infrastructure and Community Services

As Adelaide Plains continues to experience urban growth, based on research[17] 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] charlessturt.sa.gov.au/__data/assets/pdf_file/0022/160276/Planning-Social-Infrastructure-and-Community-Services-for-Urban-Growth-Areas-Feburary-2012.pdf




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:

1. 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[18] 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:

[18] Consultation 2022

| Hierarchy Level & Population | Hierarchy Includes | Current APC<br><br>9,500 residents | Future APC (2041)<br><br>18,000 residents |
|---|---|---|---|
| Neighbourhood<br>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.<br>Lewiston (3,000) playground/dog park is also an example of a gathering space<br><br>Two Wells (2500) and Mallala (733) each have Primary School, Kindergarten, Oval/Clubrooms, Council Library and Office.<br><br>Two Wells has two child care. Mallala none.<br><br>Two Wells has Community Centre (Hall). Mallala has Institute (Hall).<br><br>New School at Two Wells.<br>Museum at Mallala. | Towns will continue to serve wider districts.<br><br>If Two Wells itself is 15,000, are local neighbourhood spaces needed in Liberty & Town Centre?<br><br>If Mallala itself grows to around 1600, is a multi-purpose community hub needed? Is something similar needed if rezoning goes ahead at Dublin?<br><br>If Lewiston grows to 3500, are better developed focal spaces needed?<br>Should a fodder/hardware store with value added local retail be considered? |
| Local<br>5 – 10,000 | Community halls or small community centres, public schools, child care centres or kindergartens and access points for a range of services | | |
| District<br>20 – 50,000 | District libraries, multipurpose community centres, high schools, community health 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,<br>Is a multi-purpose community hub/health facility with services for particular groups needed?<br>Are a wider range of recreation and sport facilities needed? |
| Sub Regional<br>100,000+ | Major cultural and civic facilities, major recreation and sporting | Motorsport Park | Motorsport Park<br><br>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?<br>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).

*Recreation and Sport Trends*

Popular Recreational and Sport Activities[19]

[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 Study[20] 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] apc.sa.gov.au/__data/assets/pdf_file/0030/356493/D16-15679-FINAL-Open-Space-Plan-Background-Report-September-2016.pdf

- 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.

| Two Wells Sport and Recreation Infrastructure | | |
|---|---|---|
| Need as per 2016 Study | Provision | 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<br>• Eden 265<br>• Liberty Tranche 1 - 364 total<br>• Liberty Tranche 2 - 787 total proposed<br>• Liberty Tranche 3 - tbd<br>• TOTAL 1400 |
| | Third Oval (needed) | • To west of Two Wells Oval?<br>• In Hicks?<br>• 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<br>• Eden 265<br>• Liberty Tranche 1 - 364 total |

| | | |
|---|---|---|
| | | • Liberty Tranche 2 - 787 total proposed<br>• Liberty Tranche 3 - tbd<br>• TOTAL 1400 proposed or constructed |
| 3 soccer pitches | Xavier Soccer<br>(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.<br>(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.<br>(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 parks[21].

[21] healthyactivebydesign.com.au/design-features/public-open-spaces

*Small spaces can be designed for multiple sports*

Note that indoor recreation centres with 3+ courts typically need a population of 50,000 to support[22].

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 Design[23]
- Recreation and Sport Facility Management Guide[24]
- How to Plan for a Community Recreation and Sport Hub[25]
- How to Establish Regional Planning Groups – Guide[26]
- How to Develop a Regional Recreation and Sport Plan[27]

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 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
[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 visitation[28] 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

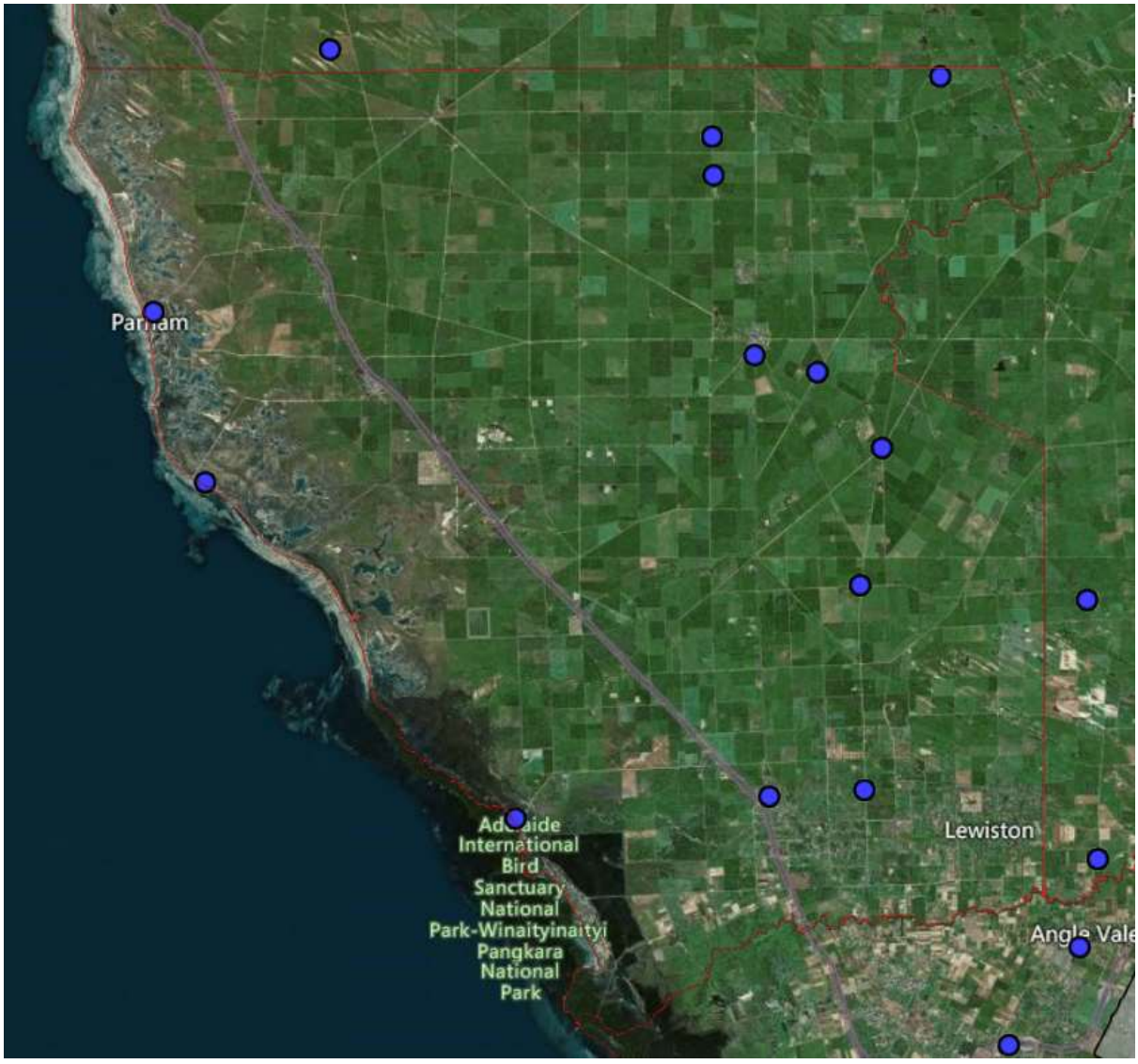
Compared to other regions, Adelaide Plains is less well known for tourism experience. Opportunities to augment visitor experiences should be considered.

[28] caravanindustry.com.au/caravanning-and-camping-most-popular-holiday-type-for-australians-in-2019-with-60-million-holiday-nights

*Telecommunication Black Spots*

Telecommunication services are provided by the private sector operating within Australian Government guidelines.

The Mobile Black Spot Program[29] 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*

[29] infrastructure.gov.au/media-technology-communications/phone/mobile-services-coverage/mobile-black-spot-program/faq

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] infrastructure.gov.au/media-technology-communications/phone/mobile-services-coverage/peri-urban-mobile-program

*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 priorities[31] 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.

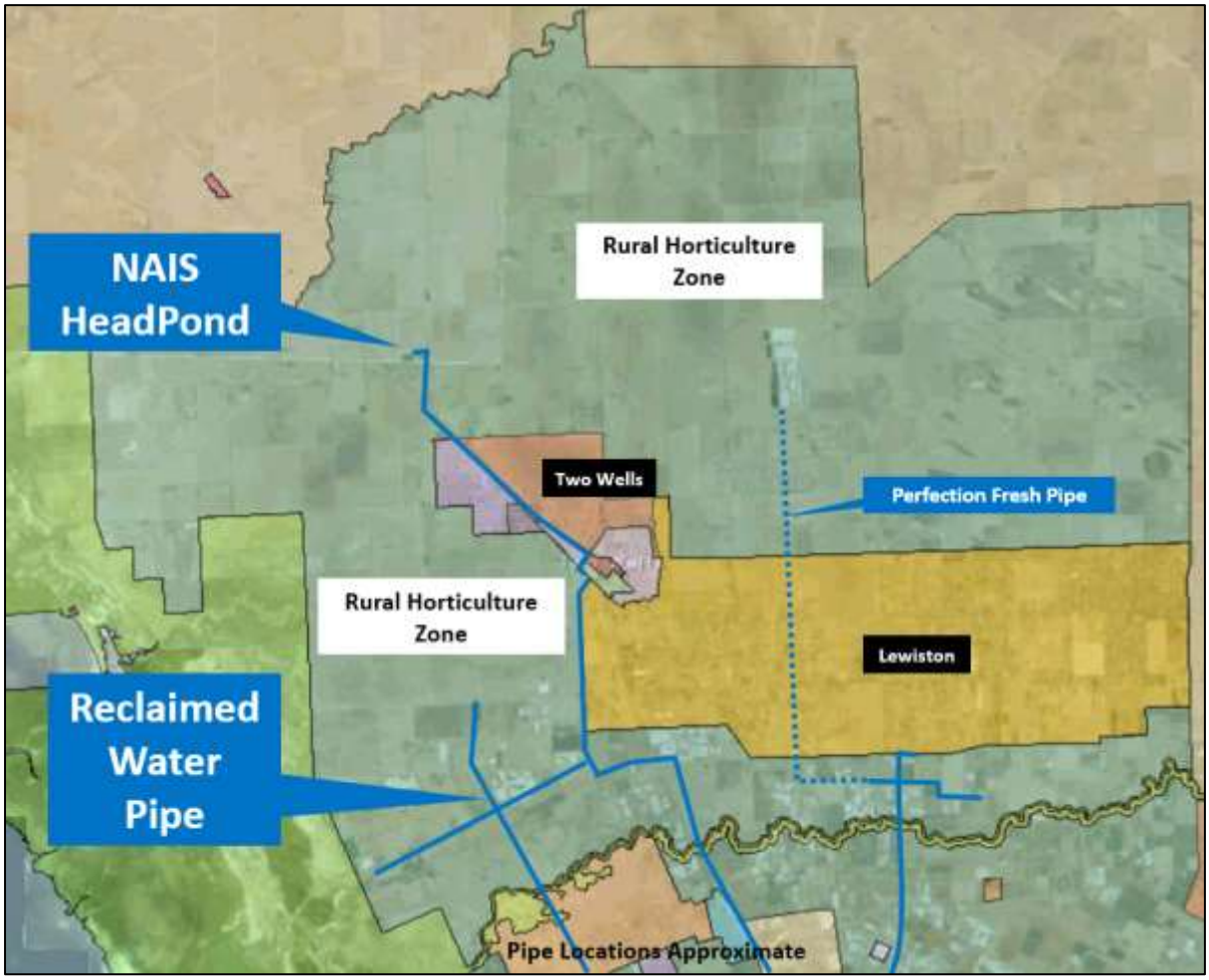
Examples of Utilities Infrastructure provided by Agencies

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 Governments[32] [33]involved 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](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.

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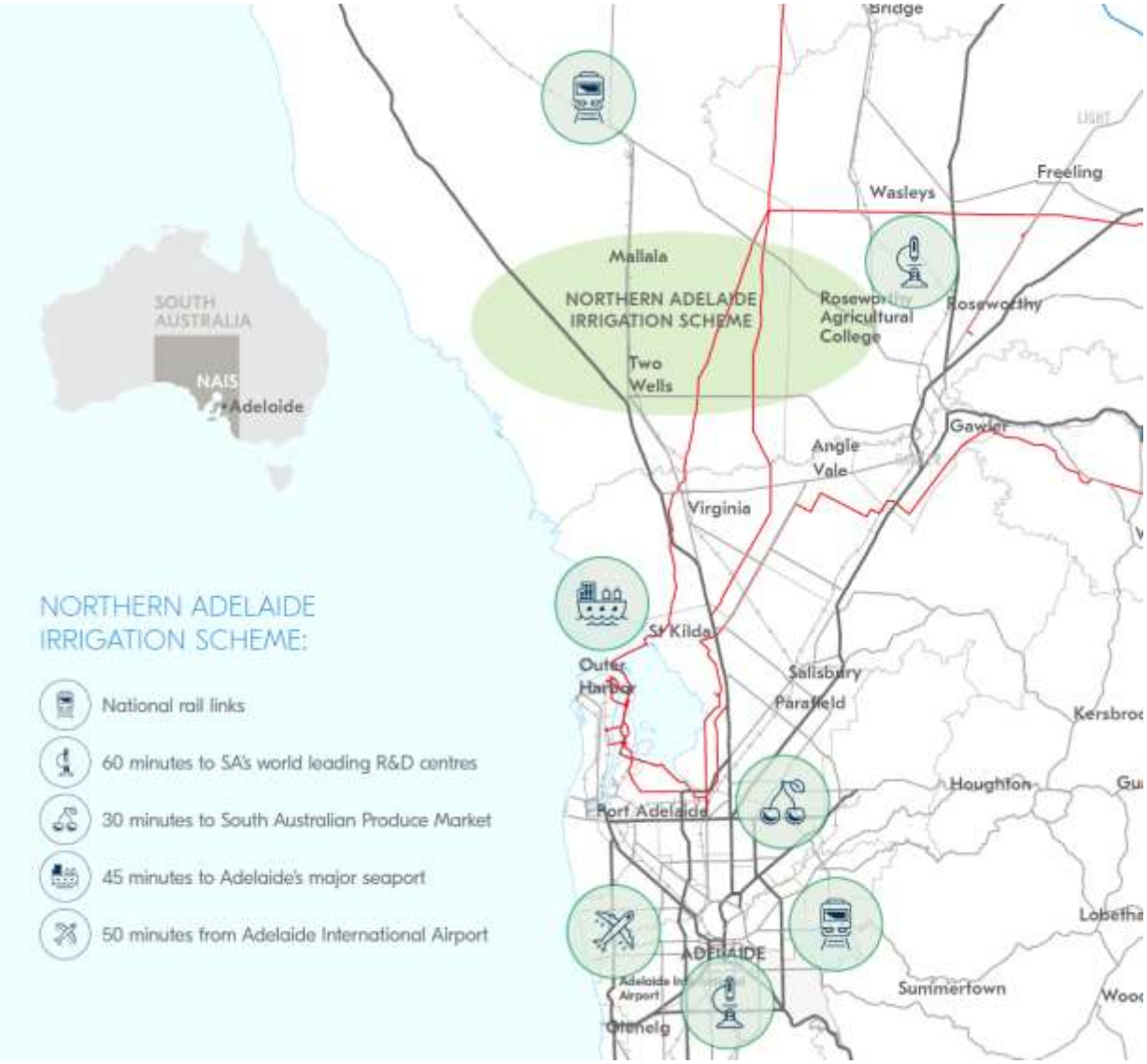
[32] Australian Government $45.6M and SA Government $110M. SA Water NAIS Call for Project Proposals 2018

[33] [nationalwatergrid.gov.au/program](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 Plains[34]

The Northern Adelaide Irrigation Scheme: Market Proving Study[35] was undertaken by Arris for Council in 2015. The Allied Food Industries Land Supply Study[36] 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)

AIS 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 Cluster[37] 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.

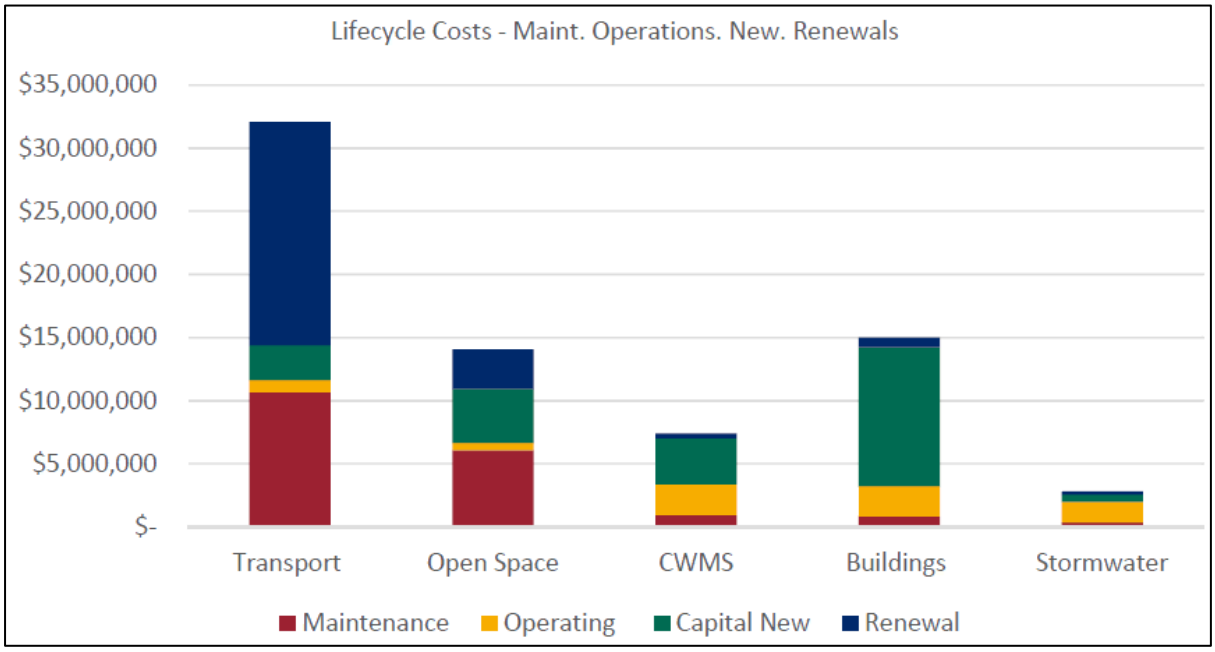
The uneconomic pricing of water as a barrier entails APC continuing advocacy with SA Water.

[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 forecast[38] 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.

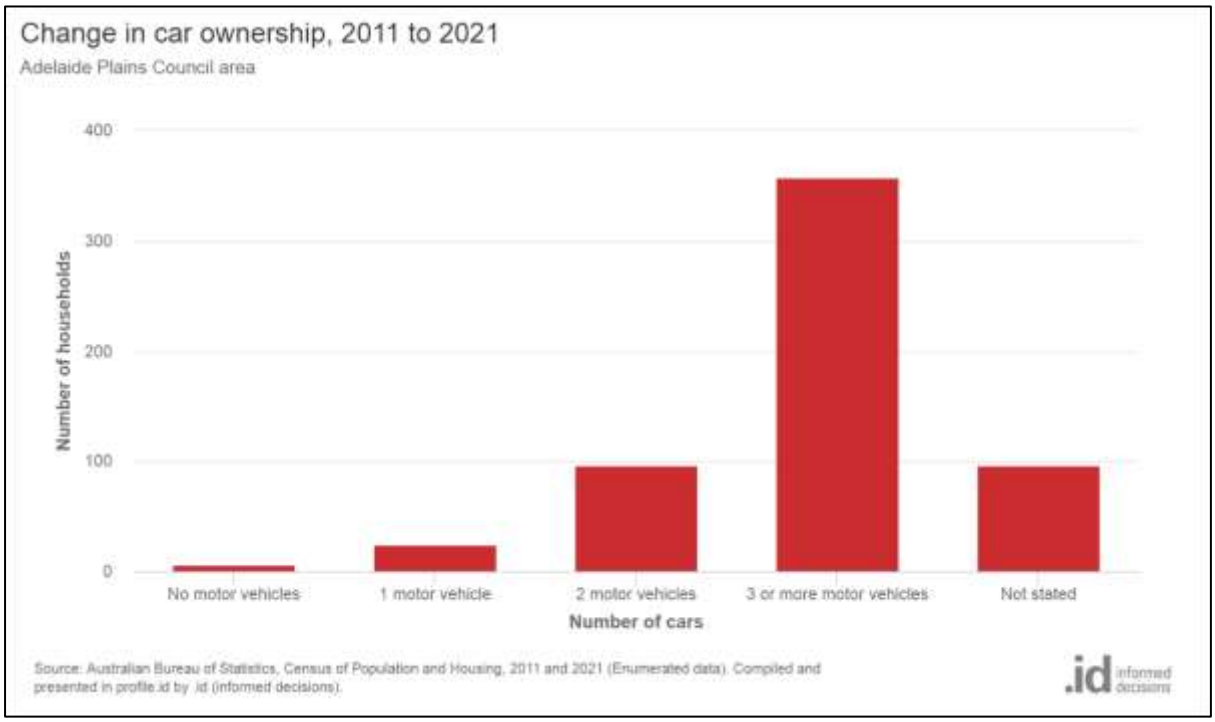
Council will work with State and Australian Governments, and community, business and development partners to realise necessary social and economic infrastructure.

**Transport**

*Car/Bus/Community Transport*

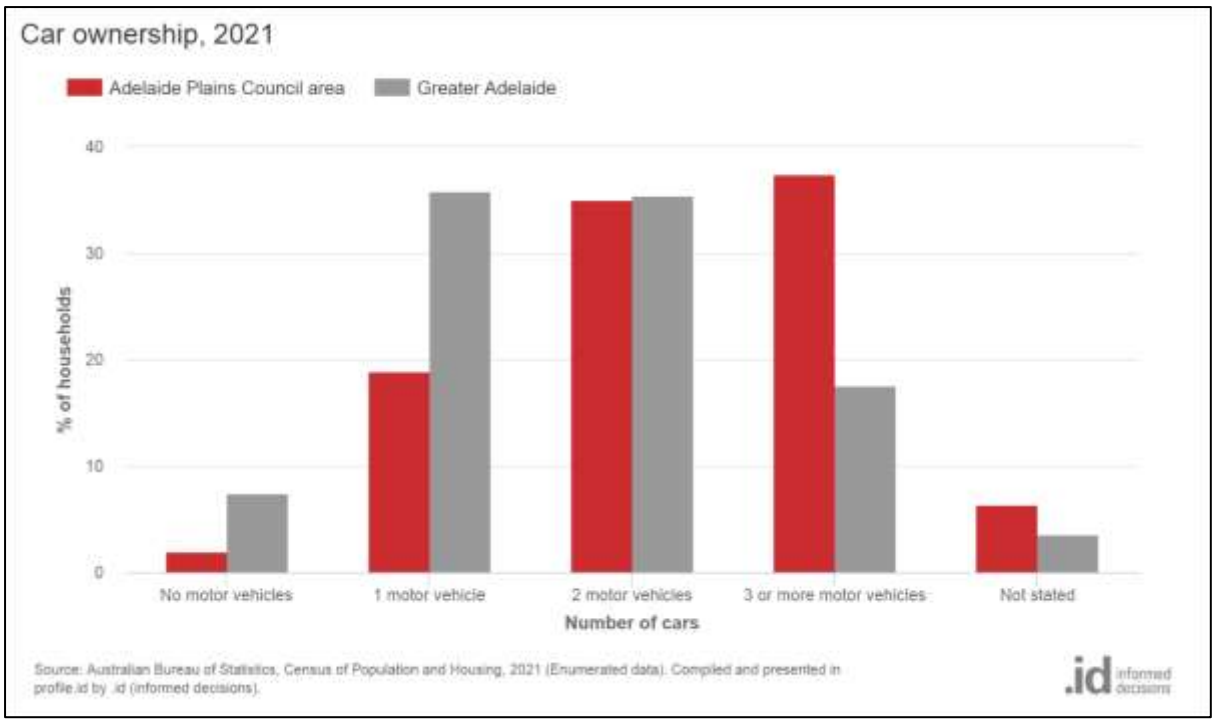
Being a functioning agricultural district with growing urban development, car ownership is high Options[39] include a Council monthly bus to Gawler/Elizabeth, the Mid North Community Passenger network, and coach services. Major towns are not serviced by public transport.

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.

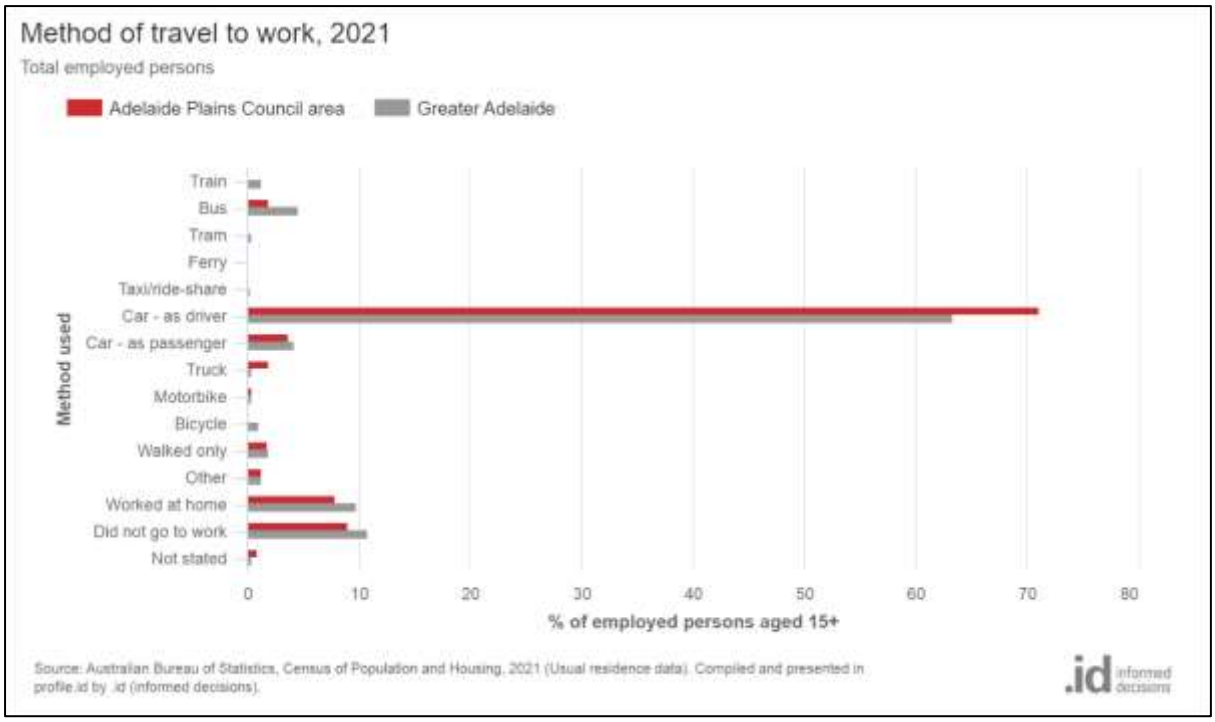



*Across Adelaide Plains, parallel with household growth has been growth in 2 and 3 vehicle households*

[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 2021[40], 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

[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 stations[41] 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. Research[42] 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 vision[43] 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] landscape.sa.gov.au/ny/about-us/our-regions-plan

*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.

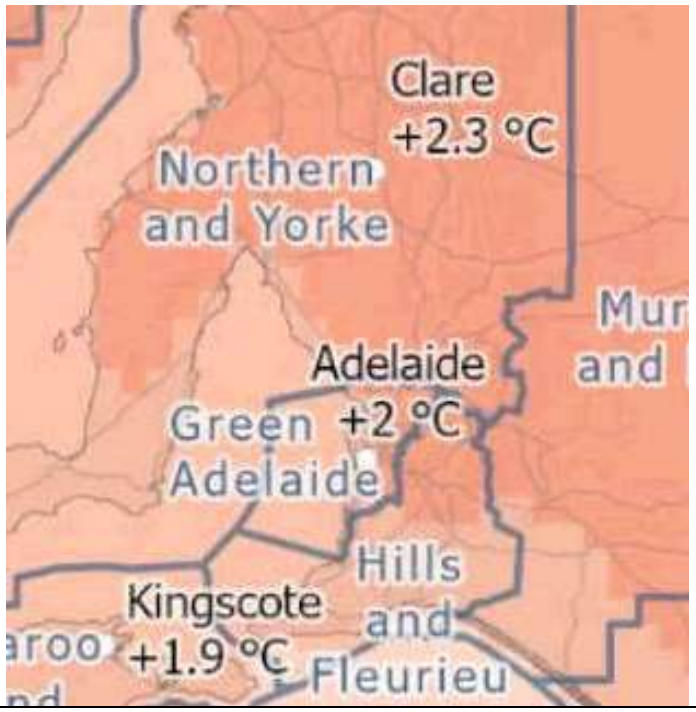
Regarding coastal inundation, past studies are informing contemporary Community Emergency Management Plans for each settlement. Past studies identify particular hazards at Middle Beach.

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*

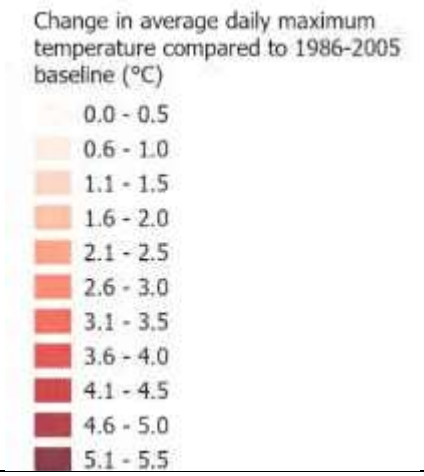
Department of Environment and Water 2022[44] analysis project increasing average temperatures, more days over 40 degrees, and lessening rainfall.

APC 1.2⁰ increase to 2039 in average daily maximum temperature (2020-2039) Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)

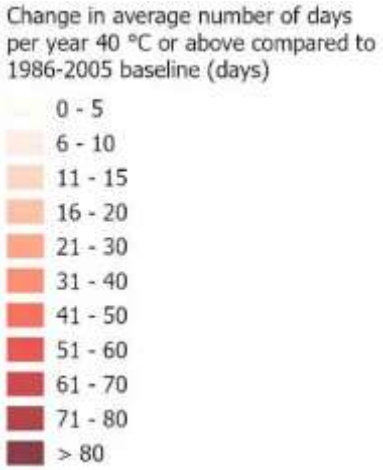



APC 2.1⁰ increase to 2099 in average daily maximum temperature (2080-2099) Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)

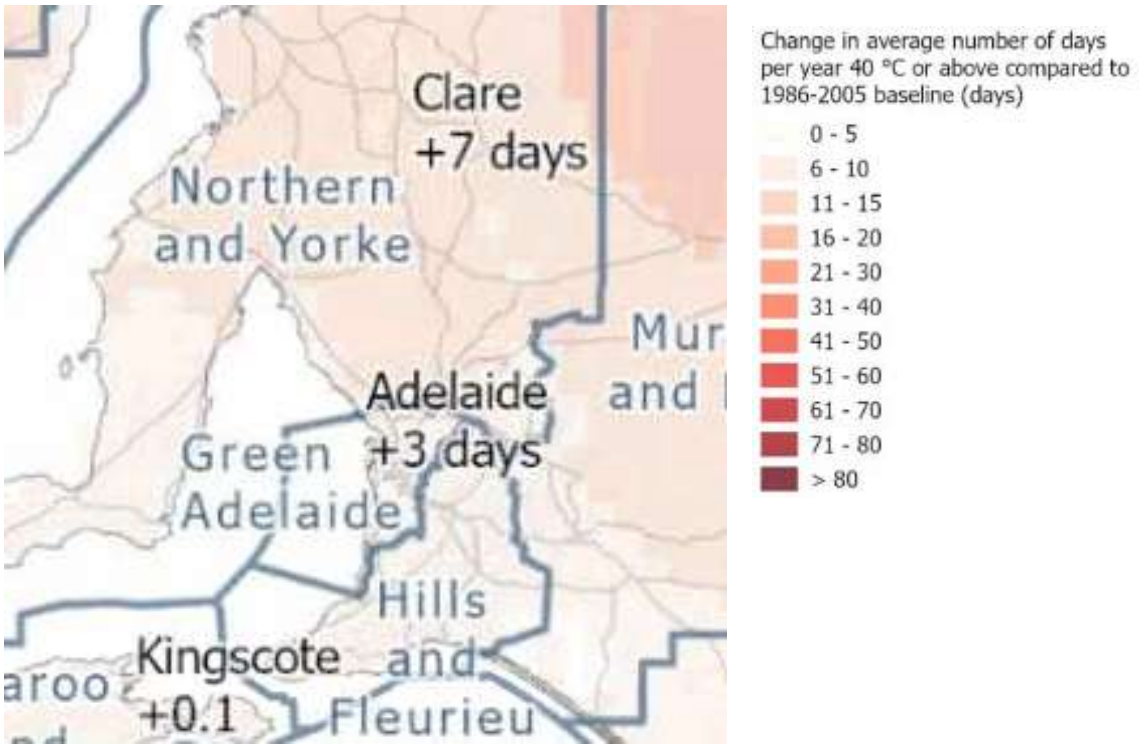
[44] environment.sa.gov.au/topics/climate-change/climate-science-knowledge-resources/latest-climate-projections-for-sa



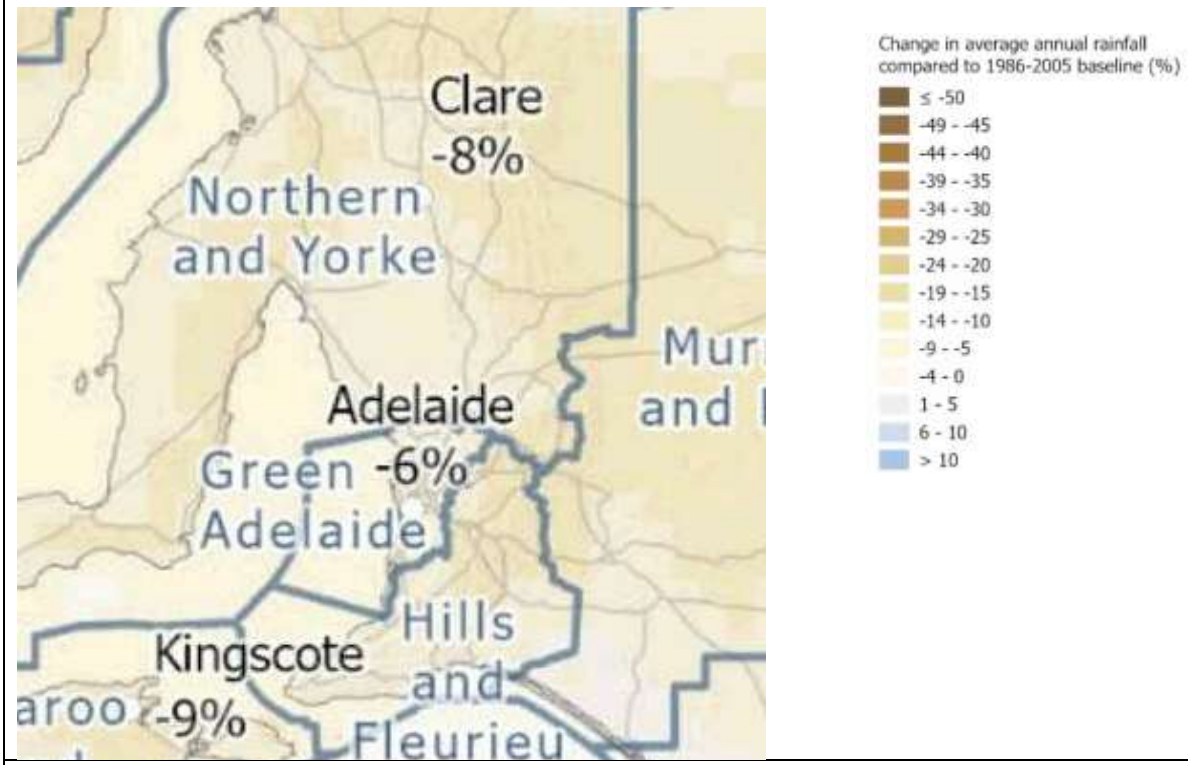

APC 1.6 increase in average number of days per year 40 °C or above (2020-2039) Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)




APC 4 increase in average number of days per year 40 °C or above (2080-2099) Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)

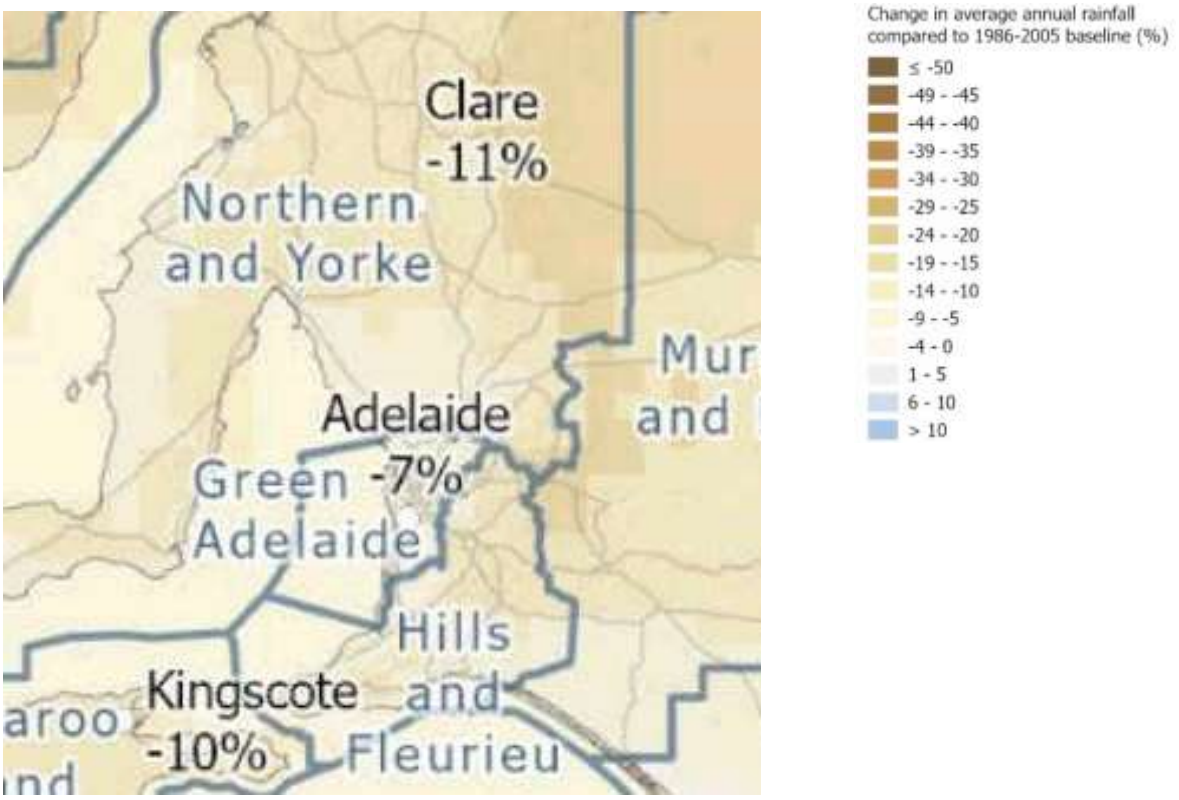



APC 7% decrease to 2039 in average annual rainfall (2020-2039)
Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)




APC 9% decrease in average annual rainfall (2080-2099)

Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)




*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 study[45] 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 report[46] 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 Mallala[47]. 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.

[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 growth[48].

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 Region[49]. 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, Salisbury, 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 | 9655 ABS | 14441 | 2% |
| 300 | | 15441 | 2.25% |
| 350 | | 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.

| Two Wells – from SA's 41st to 12th largest town in 20 years | | | |
|---|---|---|---|
| | | 2016 | 2041 |
| 1. | Adelaide | 1.165M | |
| | | | (Mt Barker Council 56,000) |
| | | | (Riverlea is aimed for 30,000, maybe later than 2041) |
| 2. | Gawler | 26,472 | |
| 3. | Mt Gambier | 26,148 | |
| 4. | Whyalla | 21,501 | |
| 5. | Murray Bridge | 16,804 | |
| 6. | Mt Barker Council | 17,365 | |
| 7. | Victor Harbour | 15,265 | |
| 8. | Crafers-Bridgewater | 15,125 | |
| 9. | Pt Pirie | 15,343 | |
| 10. | Pt Lincoln | 14,088 | |
| 11. | Pt Augusta | 12,896 | |
| | | | Two Wells 10,500 |
| 12. | Goolwa | 7,717 | |
| 13. | Nuriootpa | | |
| 14. | Strathalbyn | | |
| 15. | Naracoorte | | |
| 16. | Nairne | | |
| 17. | Millicent | | |
| 18. | Renmark | | |
| 19. | Kadina | | |
| 20. | Tanunda | | |
| 21. | Moonta | | |
| 22. | Berri | | |
| 23. | Wallaroo | | |
| 24. | Loxton | | |
| 25. | Roxby Downs | | |
| 26. | Clare | | |
| 27. | McLaren Vale | | |
| 28. | Angle Vale | | |
| 29. | Bordertown | | |
| 30. | Kapunda | | |
| 31. | Mannum | | |
| 32. | Hahndorf | | |
| 33. | Williamstown | | |
| 34. | Ceduna | | |
| 35. | Willunga | | |
| 36. | Lobethal | | |
| 37. | Freeling | | |

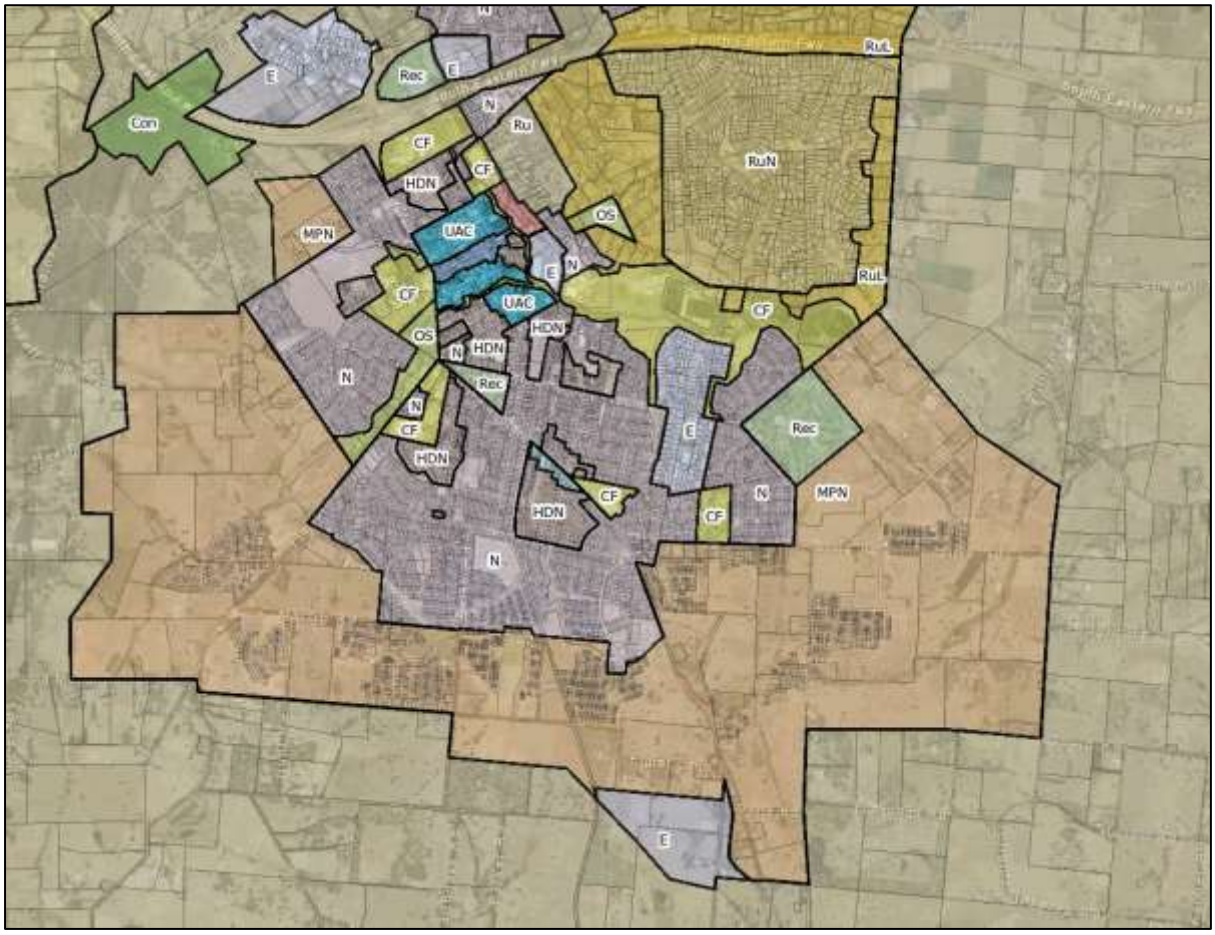
| | | | |
|---|---|---|---|
| 38. | Angaston | 2044 | |
| 39. | Barmera | 1935 | |
| 40. | Crystal Brook | 1935 | |
| 41. | Two Wells | 1926 | |
| 42. | Normanville | 1906 | |

**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-barker

[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.

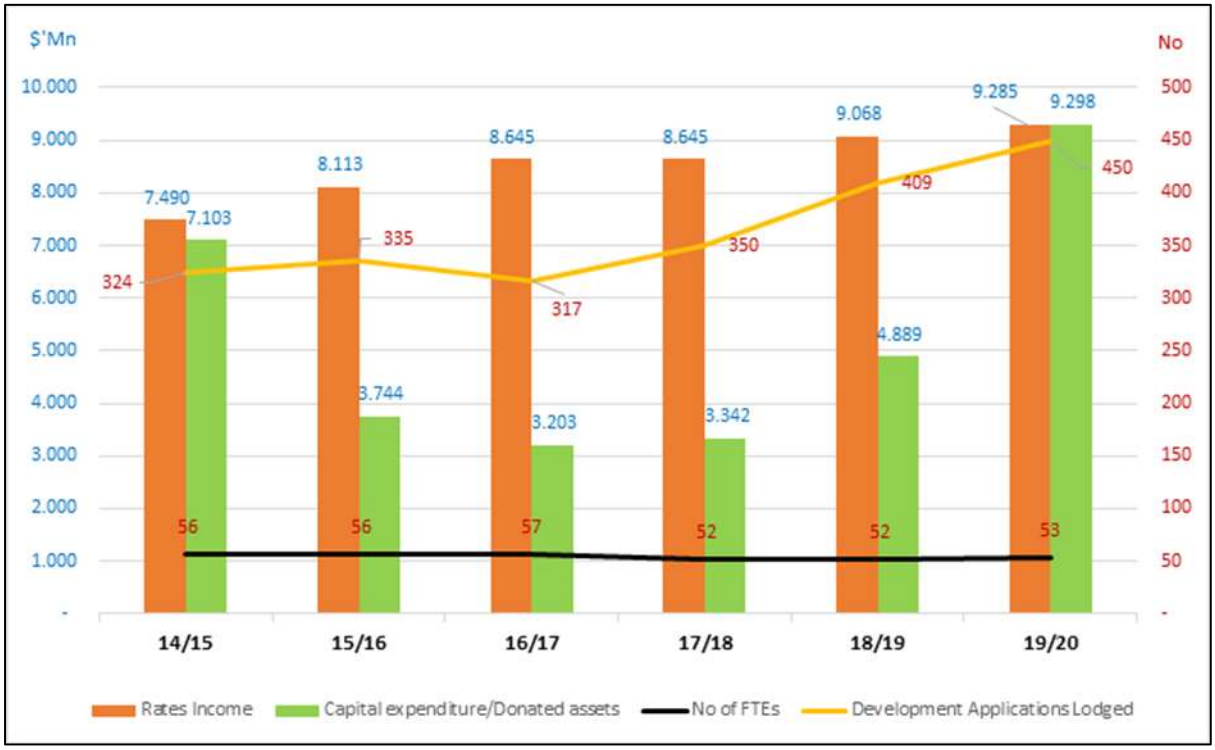
This includes future potential urban growth at Two Wells and Dublin noting Council's support for progressing two rezoning objectives. Recognising growth planned at Two Wells and Mallala, Dublin's service role in the north west and proximity to substantial areas of the Bird Sanctuary and coast, considering 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 Adelaide[52] 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 |

[52] livingadelaide.sa.gov.au/

| | | |
|---|---|---|
| Walkable neighbourhoods | Increase the percentage of residents living in walkable neighbourhoods in .. Outer Metropolitan* Adelaide by 25% by 2045 | “ |
| 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 mixed-use areas, including:<br>• ancillary dwellings such as granny flats, laneway and mews housing<br>• dependent accommodation such as nursing homes<br>• assisted living accommodation<br>• aged-specific accommodation such as retirement villages<br>• small lot housing types<br>• in-fill housing and renewal opportunities. | Need to monitor housing choice provision.<br>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<br><br>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 |
|---|---|
| P47. Plan future suburbs and regenerate and renew existing ones to be healthy neighbourhoods that include:<br>• diverse housing options that support affordability | Relevant for all townships and settlements, including future growth |

| | |
|---|---|
| • access to local shops, community services and facilities<br>• access to fresh food and a range of food services<br>• safe cycling and pedestrian friendly streets that are tree-lined for comfort and amenity<br>• diverse areas of quality public open space (including local parks, community gardens and playgrounds)<br>• sporting and recreation facilities<br>• walkable connections to public transport and community infrastructure. | |
| 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:<br>• protect key primary production assets and opportunities<br>• facilitate local operating and investment conditions that support primary production and related agri-business development<br>• enable timely business adjustment and climate change adaptation by primary producers. | Need to monitor.<br><br>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:<br>• 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<br>• facilitating sustainably designed tourism accommodation in suitable locations<br>• 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:<br>• preserving adequate separation distances between mining activities, housing and other incompatible development<br>• ensuring buffers are contained within mine sites wherever possible<br>• mitigating potential interface issues<br>• maintaining access to freight networks. | Limited mining in APC |
| P65. Identify and protect the high pressure gas pipelines and other key infrastructure services. | Provided for in SA 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 housing and other sensitive land uses. | 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 – Infrastructure*

| 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:<br>• walking and cycling paths and facilities<br>• local stormwater and flood management including water sensitive urban design<br>• public open space<br>• sports facilities<br>• street trees<br>• 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:<br><br>• Nature Protection Areas:<br>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.<br><br>• Complementary Developed Landscapes:<br>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. | Consider 30YP areas in more detail.<br><br>Conservation areas provided for in SA Planning system and Planning and Design Code. |
| P91. Protect coastal features and biodiversity including:<br>• habitats that are highly sensitive to the direct impacts of development<br>• important geological and/or natural features of scientific, educational or cultural importance<br>• landscapes of very high scenic quality. | Provided for in SA Planning system and Planning and Design Code. |

*Policies – Open Space, Sport and Recreation*

| Policies | APC Relevance |
|---|---|
| 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 | Build on 2016 Open Space studies |

| | |
|---|---|
| buffers, and sustainable recreation and sporting facilities (See Map 11). | |
| P99. Ensure quality open space is within walking distance of all neighbourhoods to:<br>• link, integrate and protect biodiversity assets and natural habitats<br>• provide linkages to encourage walking and cycling to local activities, local activity centres and regional centres<br>• be multi-functional, multiuse (including the shared use of strategically located school facilities) and able to accommodate changing use over time<br>• incorporate the principles of Crime Prevention Through Environmental Design for safety and amenity<br>• contain appropriate and low maintenance species and locate trees to maximise shade<br>• encourage unstructured recreation opportunities such as the provision of a variety of paths and children's play equipment<br>• 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:<br>• protect valuable primary production land<br>• reinforce the Hills Face Zone, character preservation districts and Environment and Food Production Areas<br>• conserve areas of nature protection areas<br>• 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.<br><br>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 new developments to manage water quality, water quantity and water use efficiency and to support public stormwater systems. | Provided for in SA Planning system and Planning and Design 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:<br>• avoidance<br>• adaptation<br>• 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

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**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 Strategy[1].

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

| APC 2020 submission | Comment re 2022 Code |
|---|---|
| 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. | Large scale horse keeping not notified, at odds with Council 2020 submission.<br><br>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 90m$^2$ and with wall heights above 3.6m) within the Master Planned Township zone and includes the following DTS maximum criteria:

- floor area 60m$^2$
- 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.

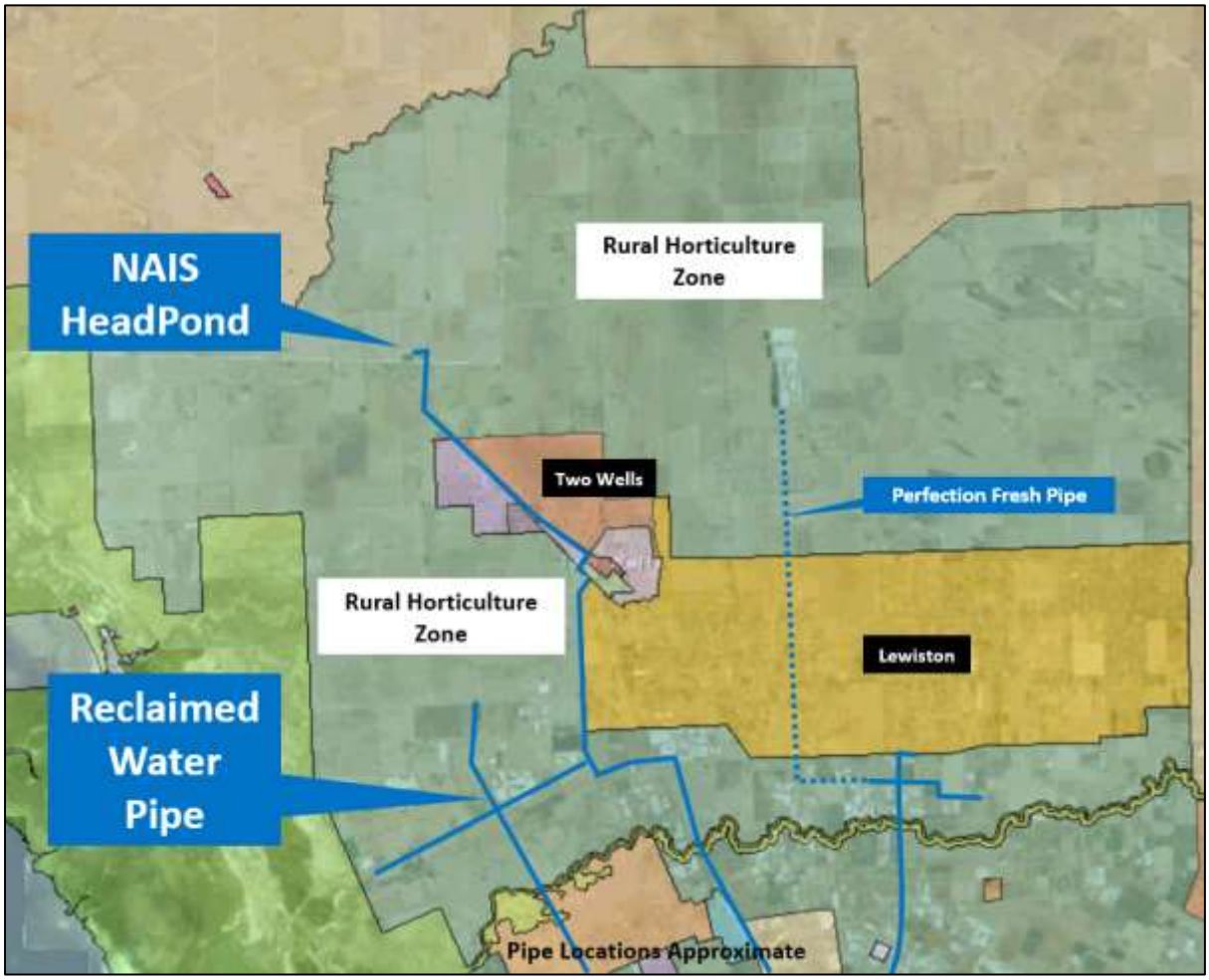
**Conflict Between Agricultural Land Uses / Buffer Zones**

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

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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 anomaly[2].

**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 EFPA[3] 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**, the relevant authority **must refuse** development authorisation | Development proposing lots for residential purposes **MUST** be refused. |
| If the proposed development **creates 1 or more lots**, a planning authority (such as CAP or staff under delegation), must not grant development authorisation unless the Commission concurs.<br><br>If the Commission is the relevant authority, the Commission must not grant development authorisation unless the council concurs<br><br>No appeal lies against a refusal to grant development authorisation<br><br>Development authorisation is subject to the condition that the lots created will not be used for residential development. | A planning authority's proposed decision to approve lots for non-residential purposes **MUST** be concurred with by the Commission and any approval IS SUBJECT to the condition that the lots not be used for residential purposes. |
| Development proposing lots for the following purposes may be consented:<br><br>• dwelling for residential purposes on land used primarily for primary production.<br>• hotel | Dwelling with primary production, motel, hotel or other temporary residential accommodation can be considered regarding the Planning and Design Code. |

3 plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_areas#have_your_say_on_the_efpa_review

| | |
|---|---|
| • motel<br>• any other form of temporary residential accommodation for valuable consideration | Primary production may not include horticulture, or animal husbandry depending on the specific nature of the activity |
| Land division for residential purposes able to be assessed during a transitional period that expired 31 March 2019 | The two year period enabled divisions for residential purposes to be lodged. Such development applications are no longer possible. |

Frequently asked questions about the EFPA are available via 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.<br>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.<br>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.<br>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.<br>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.<br>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.<br>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.<br>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. | EFPA aligns well with the suitability of townships for residential development, undergirding their role in providing services.<br><br>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 housing[4] 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.

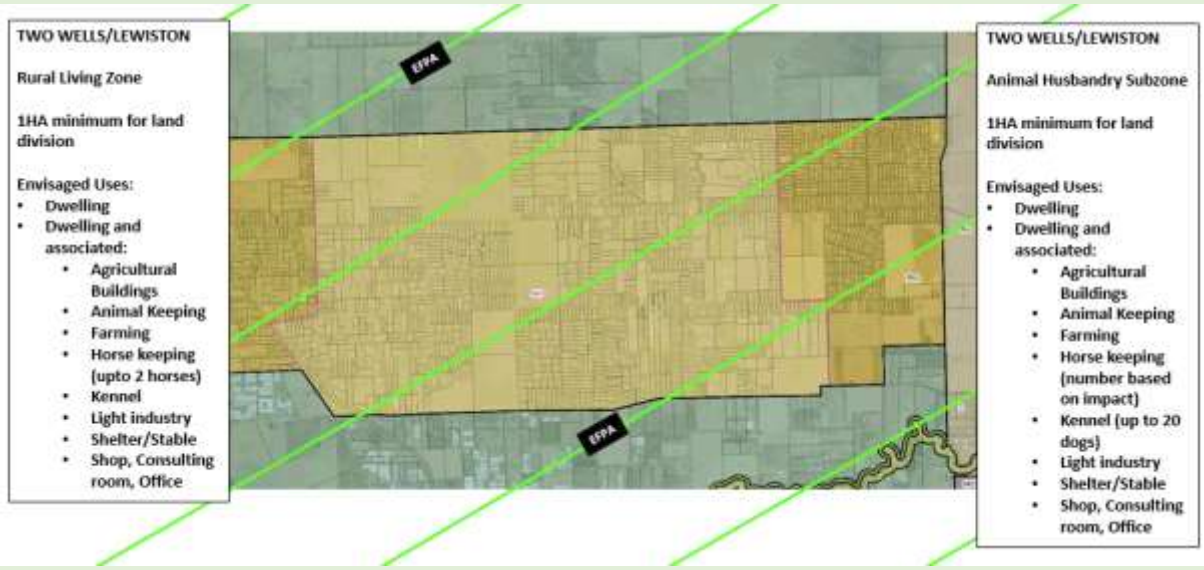
| ZONES WHICH ENVISAGE SUBDIVISION FOR A DWELLING WITH HORSE KEEPING OR DOG KENNELLING | | |
|---|---|---|
| **Zone** | **Dwelling with Horse Keeping** | **Dwelling with Dog Keeping** |
| Animal Husbandry Sub Zone | Yes | Yes |
| Rural Living | Yes | Yes |
| Rural Horticulture | Yes | Less certain |
| 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

**About the Two Wells Lewiston Animal Husbandry SubZone**




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.

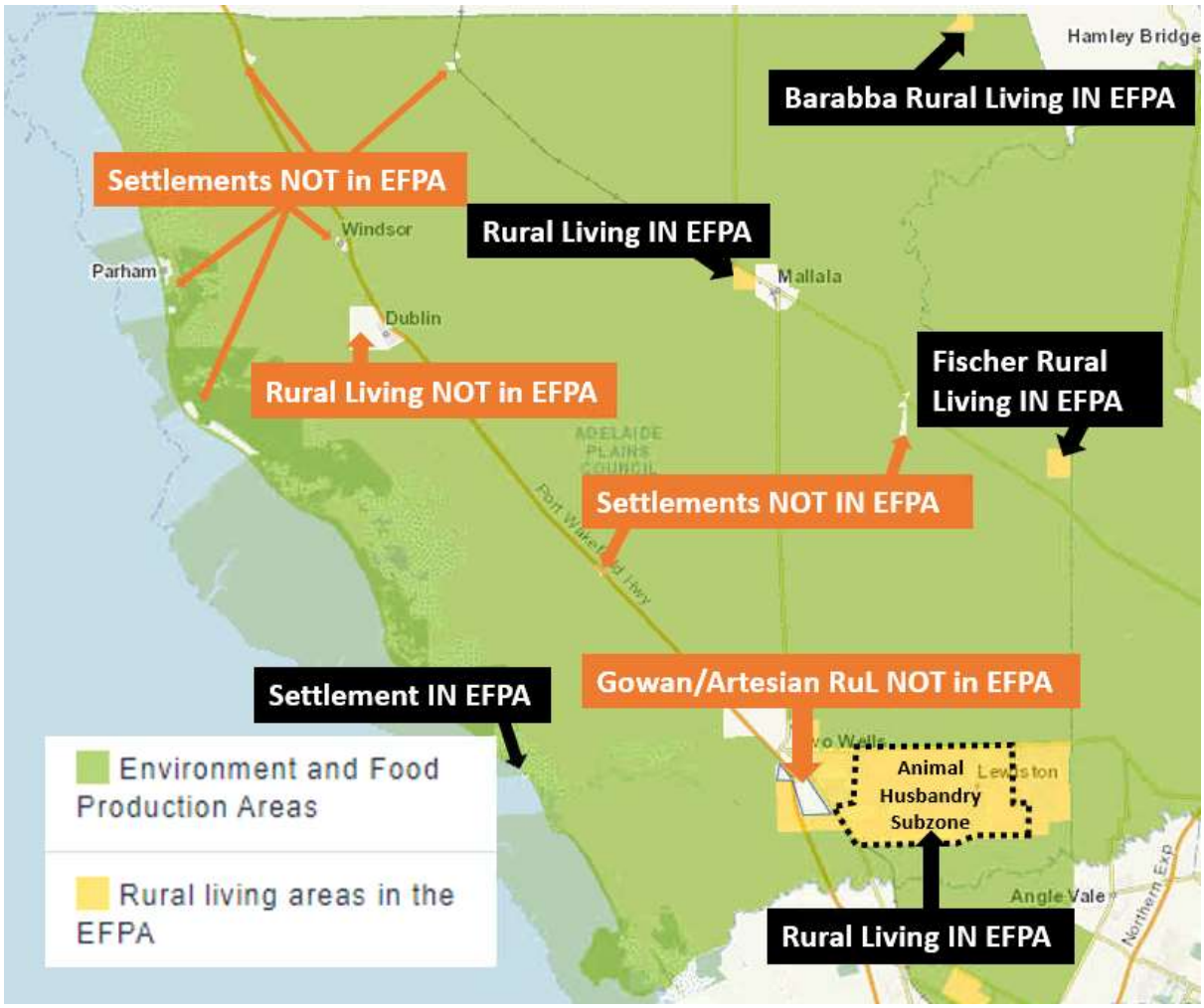
The Planning and Design Code is emerging as a customer friendly and easily navigable digital statutory planning instrument. The Code is being used by landowners, investors, land agents, businesses, residents, developers and planners.

The Commission and PLUS's ongoing work fine-tuning the Planning and Design Code is supported.

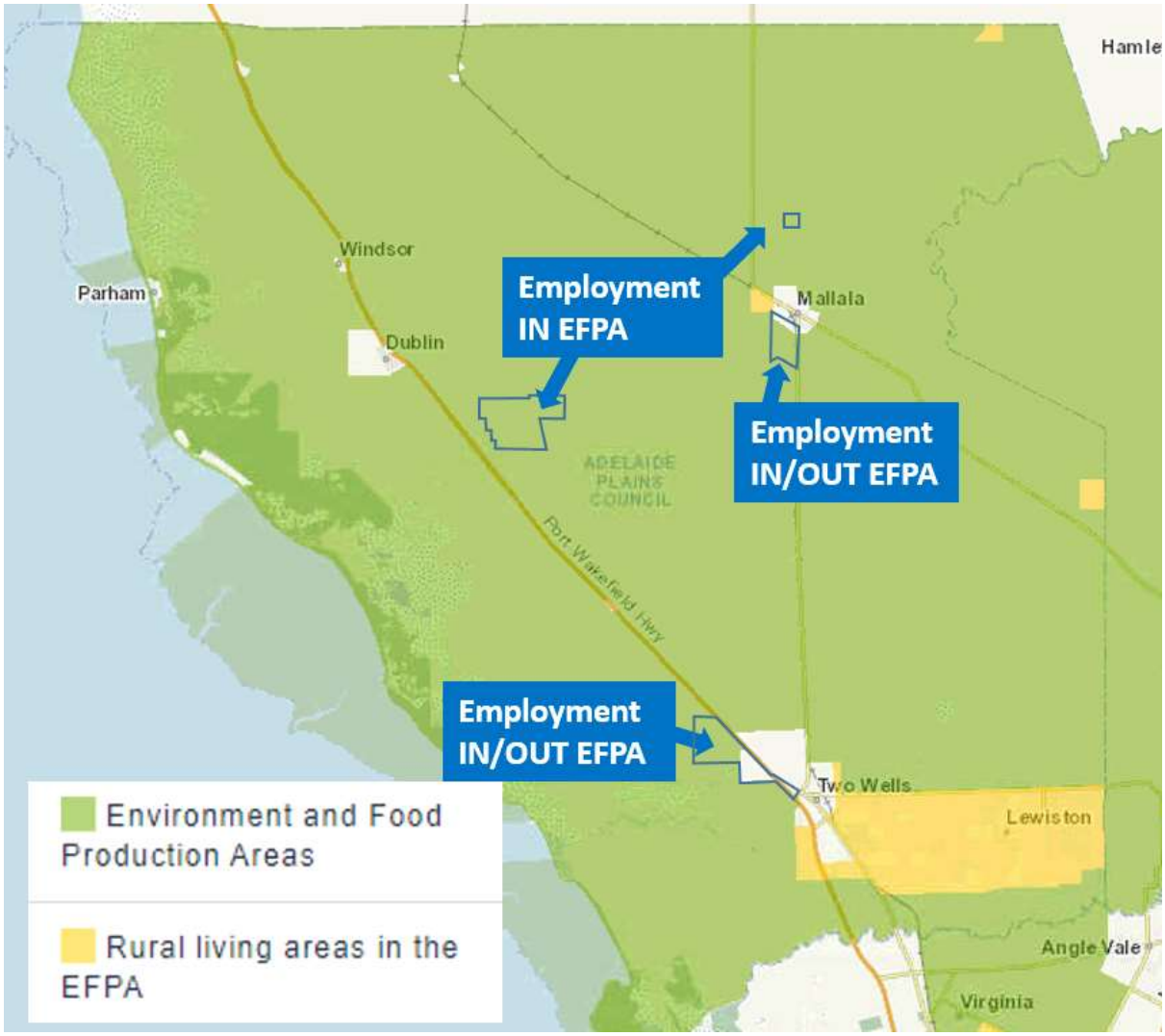
Given the user value of the Planning and Design Code for certainty, the lack of the EFPA 'rules' being reflected directly in the Code needs change.

**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 Wells, Lewiston | Dublin and Gower/Artesian |
| Settlements | Middle Beach | Wild Horse Plains, Long Plains, Windsor, Light, Redbanks, Parham, Webb Beach and Thompsons Beach |
| Employment Land | Part South West Mallala<br>Part West of Two Wells<br>Carslake Road<br>Adjacent Mallala Raceway | Part South West Mallala<br>Part West of Two Wells |

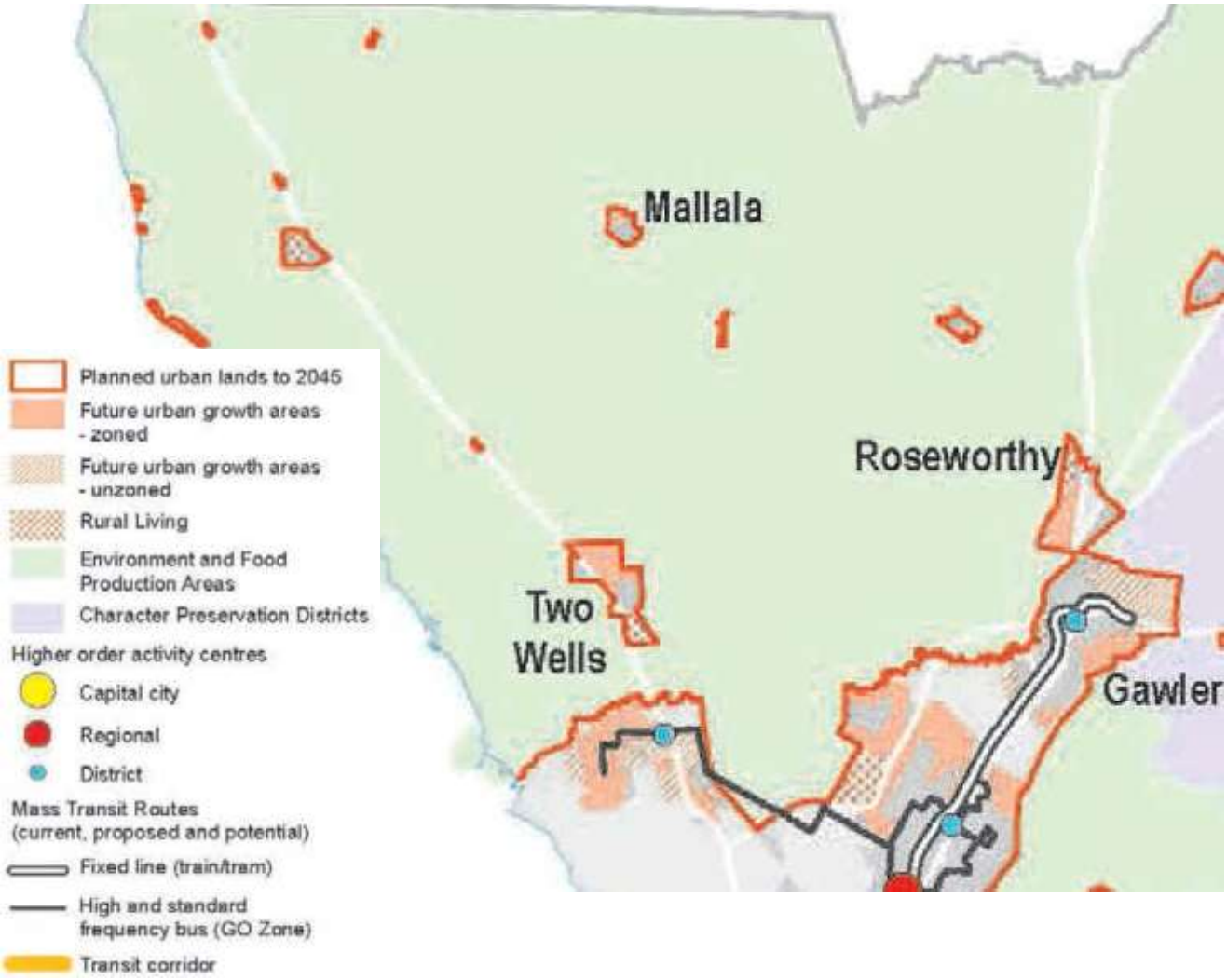



Rural Living Areas NOT included within the EFPA (being Dublin and Cowan/Artesian) seem to correlate with being planned as 'urban lands' in the 30 Year Plan for Greater Adelaide. Conversely, Rural Living Areas WITHIN the EFPA (e.g Mallala, Two Wells and Lewiston) seem to correlate with not being planned 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.**

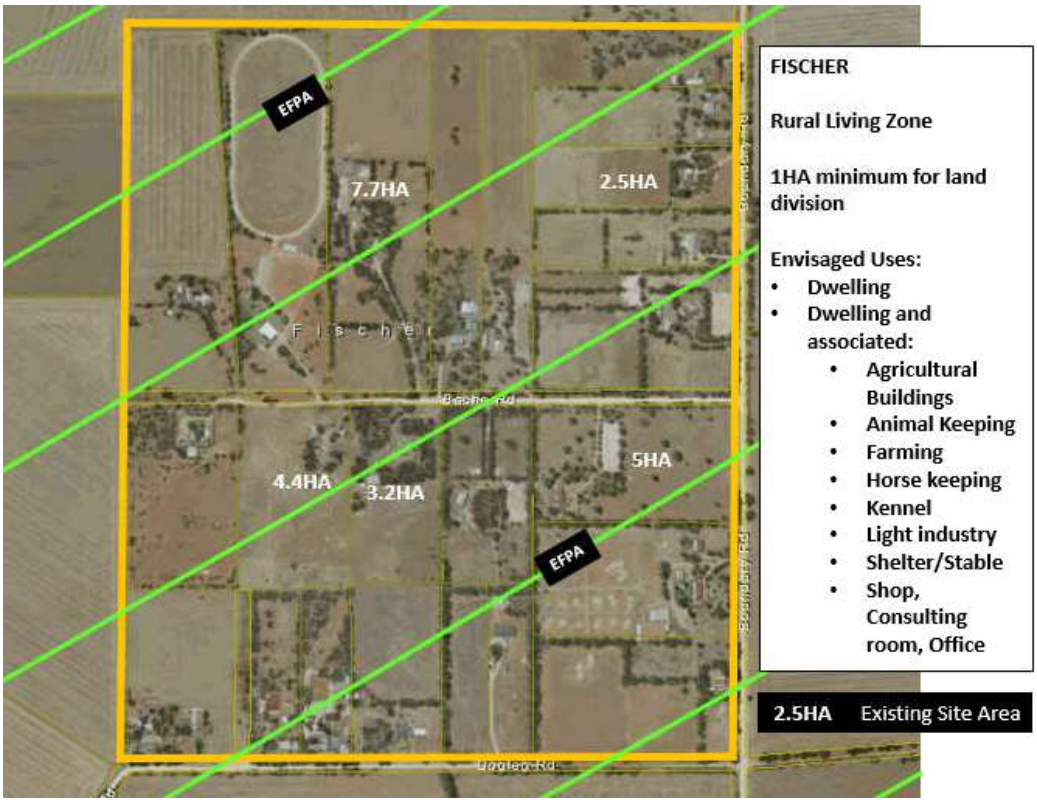
The below table provides background and analysis about each Rural Living Area

## Rural Living - Employment – Settlement Zones EFPA Background

BARABBA

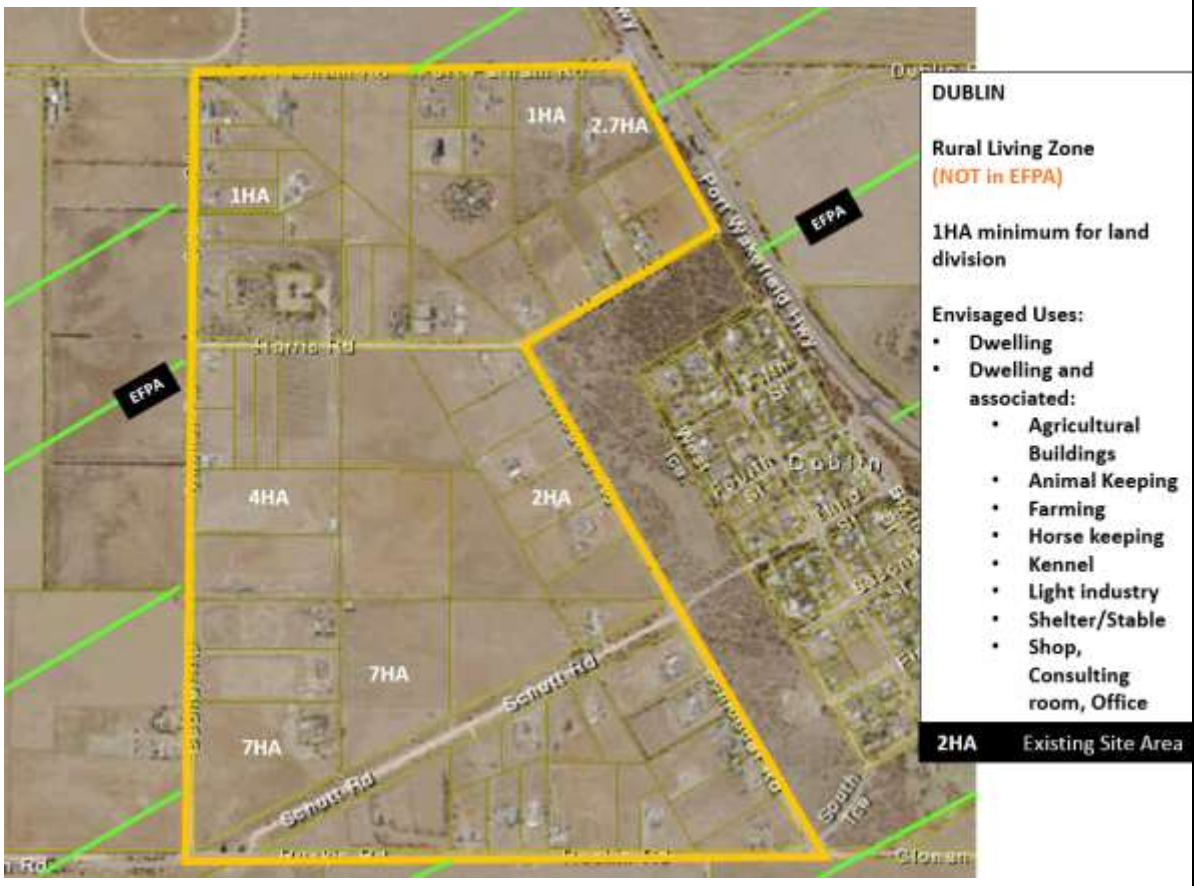
The EFPA limits potential residential subdivision into 1HA lots of the nine lots greater than 2HA

FISCHER




The EFPA limits potential residential subdivision into 1HA lots of approximately 18 lots greater than 2HA.

DUBLIN




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

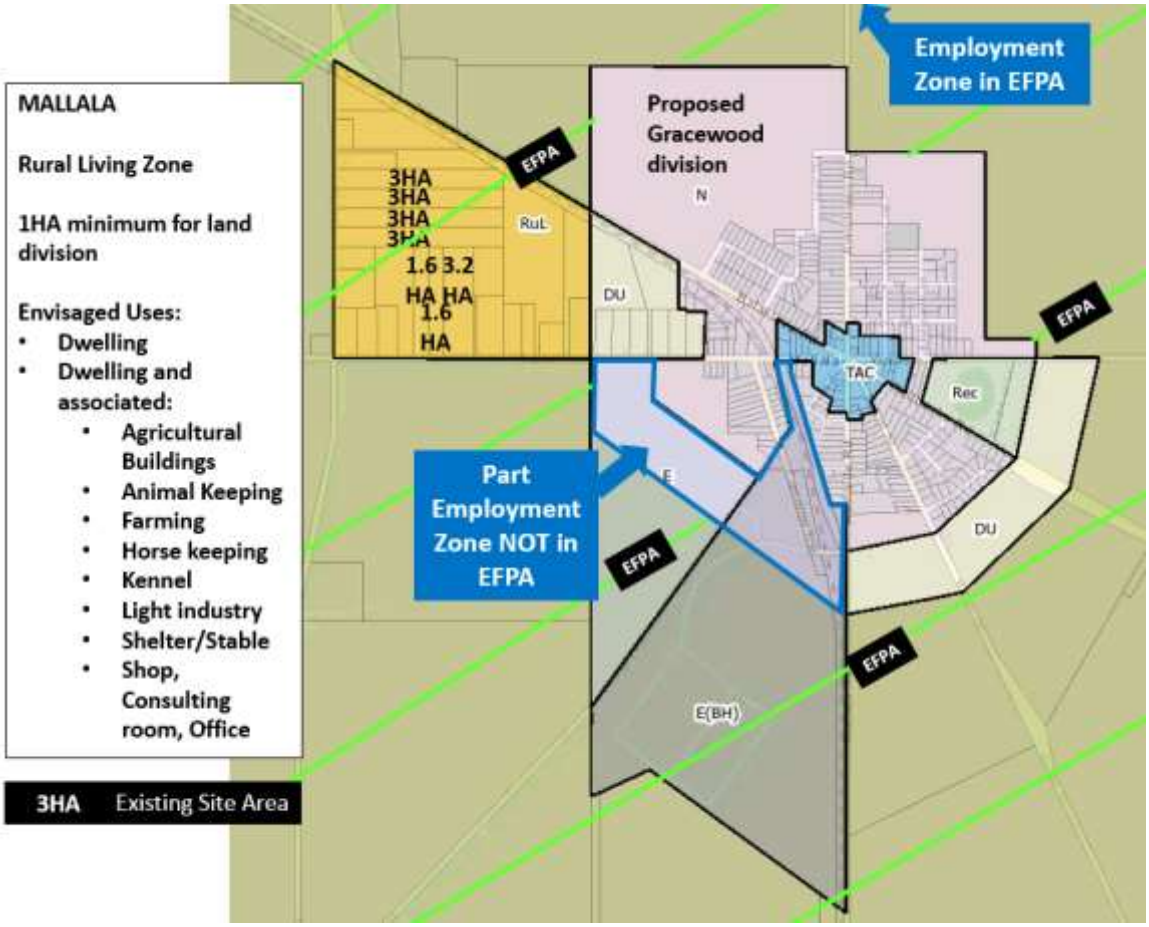
Council provided an in-principle letter of support to Leinad Land Developments (Dublin) Pty Ltd (Attachment A) to advocate for boundary change to the EFPA. This letter arose from a Council decision of 23 September 2019:

"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."

MALLALA




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:**

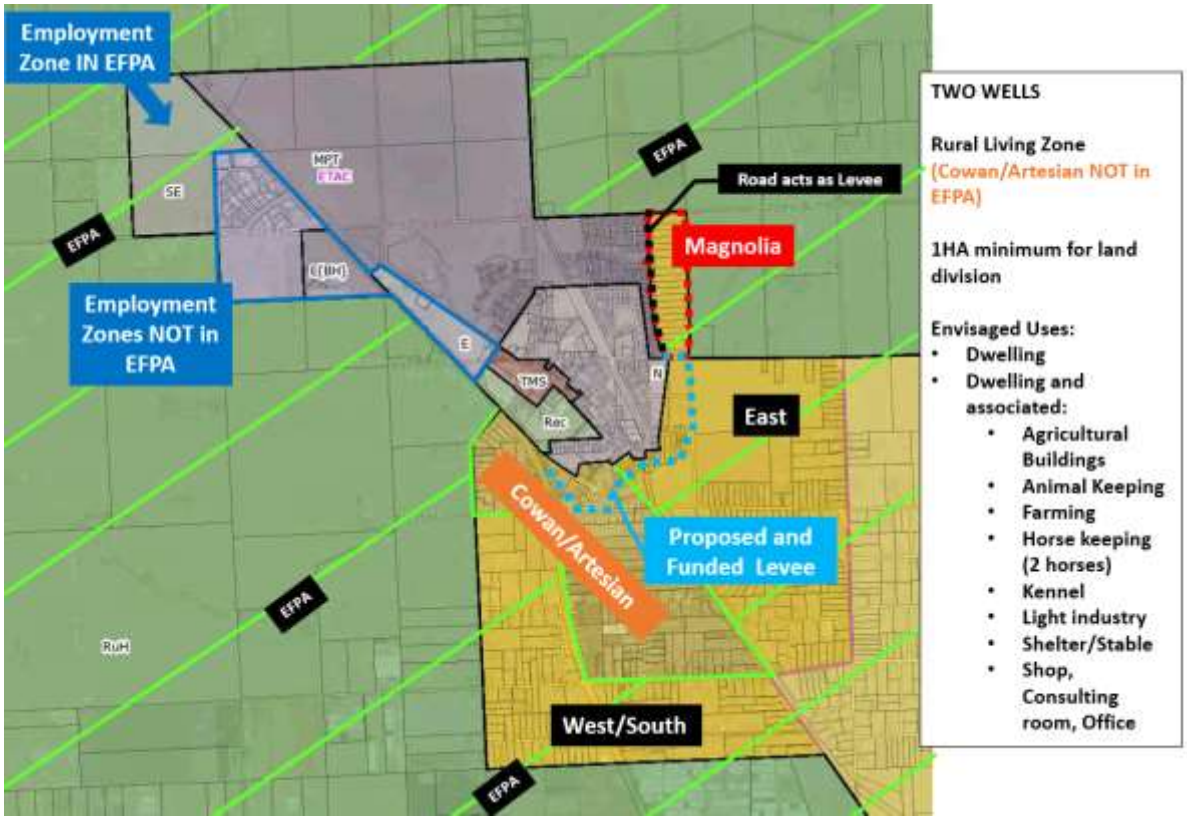
**Council requests the EFPA be lifted from the Rural Living land**

**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.**

TWO WELLS TOWNSHIP




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:-

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."

**Comment to Commission:**

**Rural Living Zoned Land**

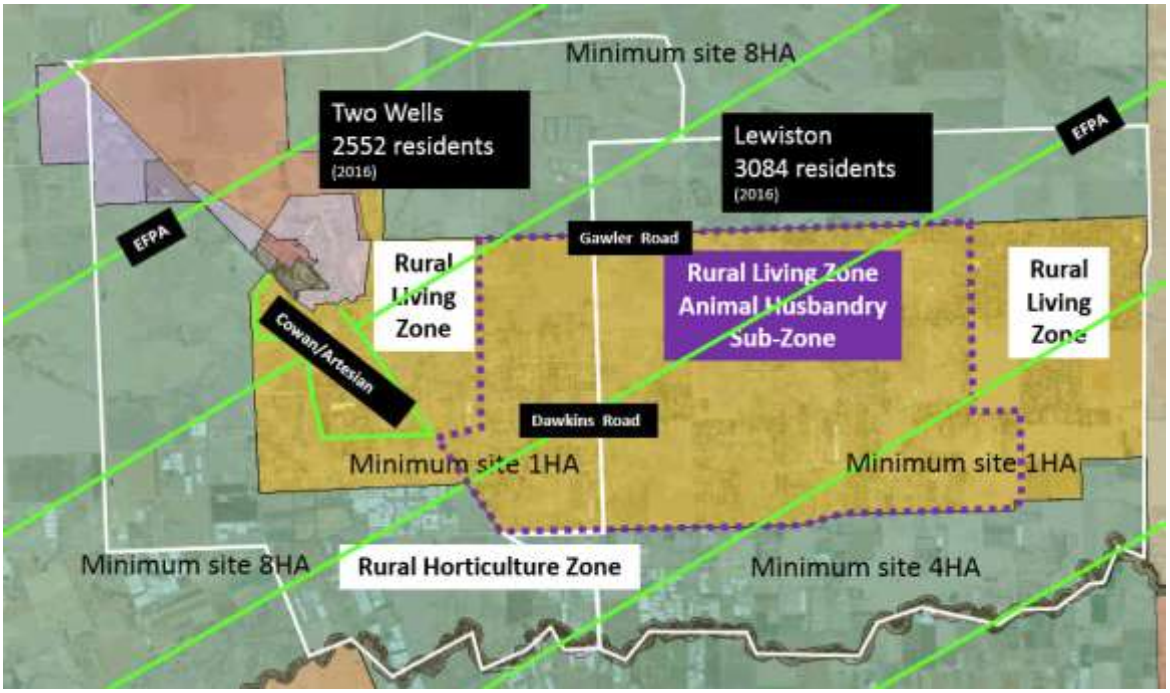
**The EFPA applying within the area of the funded levee should be lifted. Council expresses interest in investigations commencing with respect to the Rural Living Zoning within this area.**

**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.

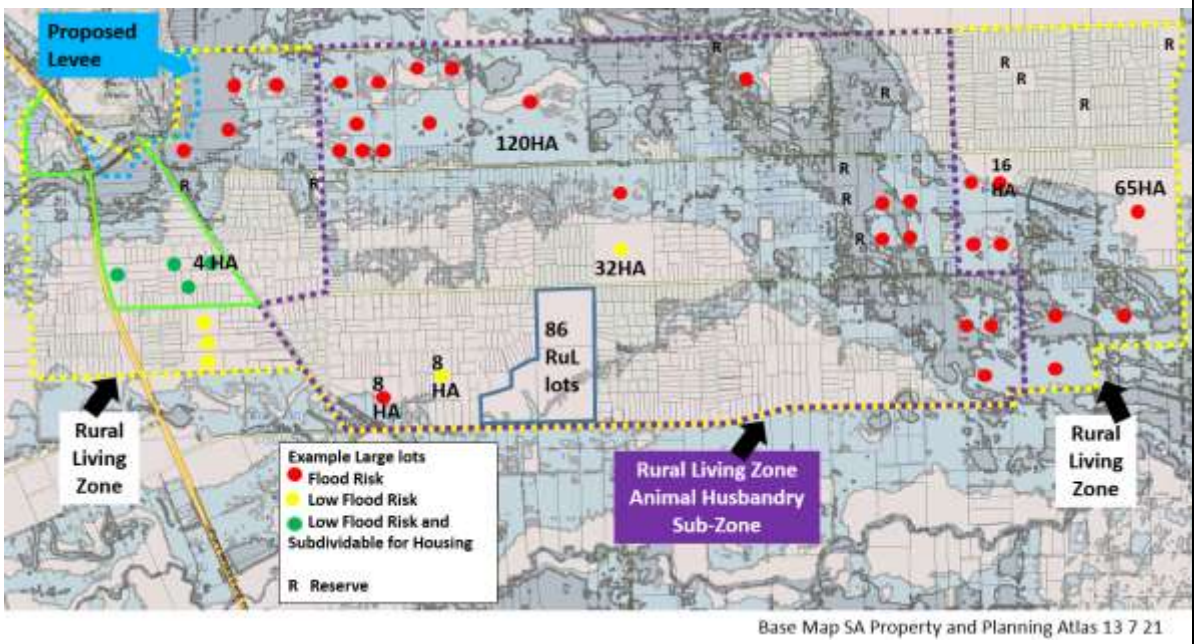
*The Animal Husbandry Subzone envisages sites developed for housing with horse keeping or dog breeding businesses. Standalone Residential Living is also envisaged. Photo near Hams Park, Lewiston, May 2021*

*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.




*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:**

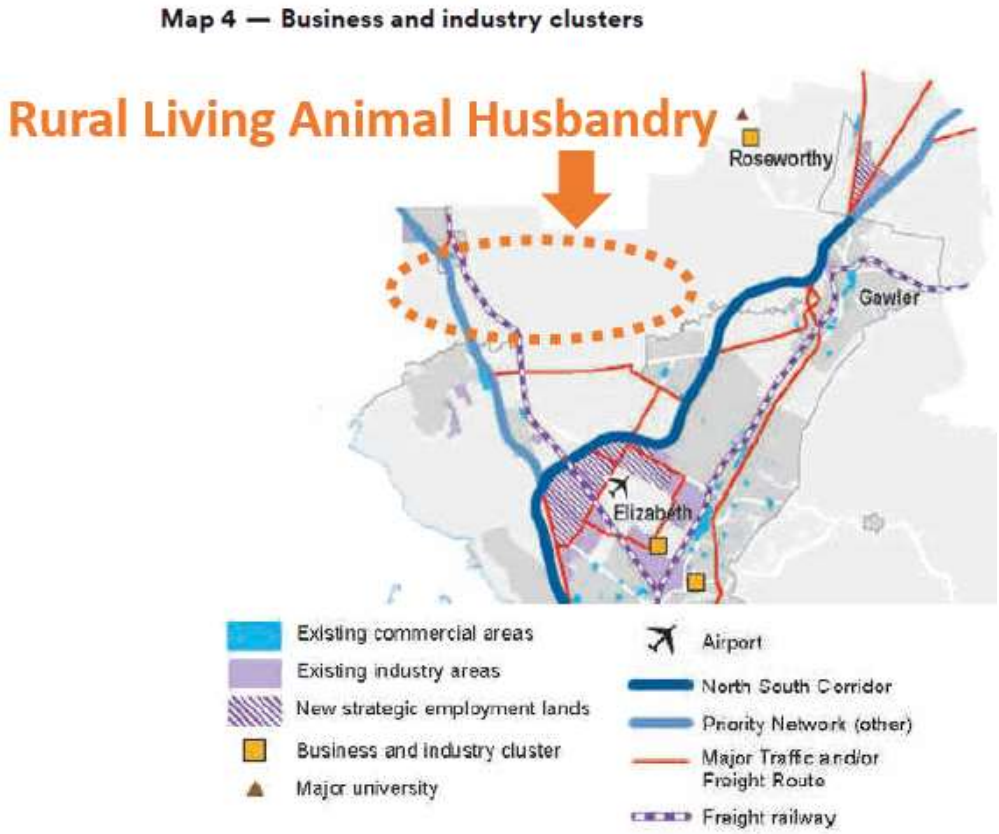
**Council is open to the Environment and Food Production Area continuing in place over Two Wells / Lewiston Rural Living Zone and Animal Husbandry Subzone until, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:**

**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.**

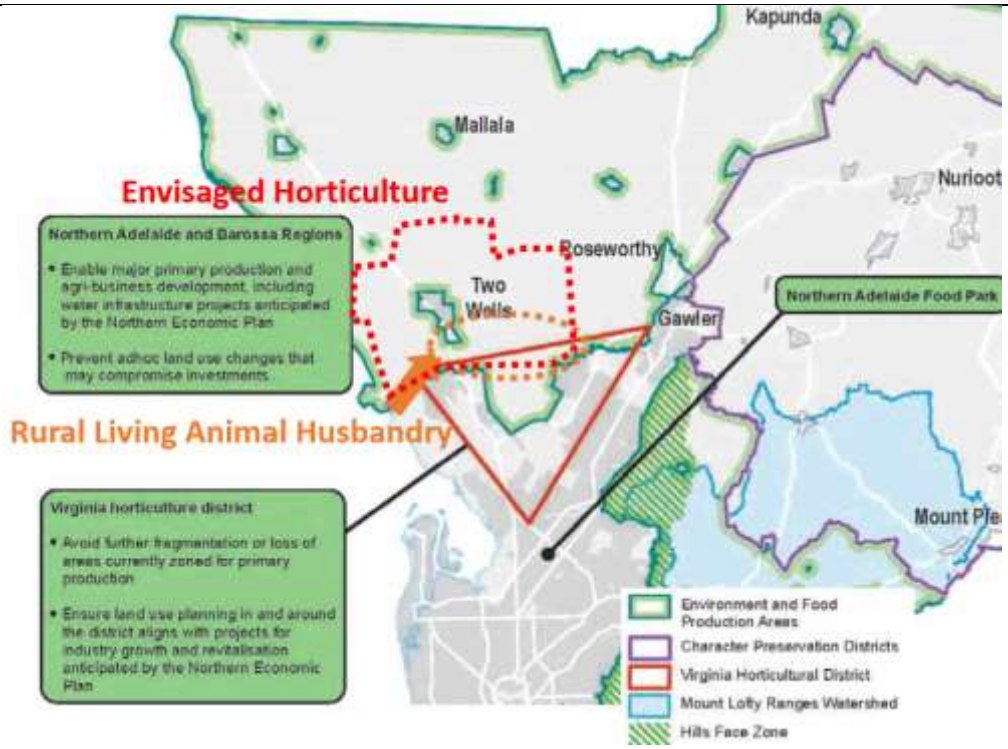
**b. The lack of the Environment and Food Production Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.**

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.




*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 Reports[6] for Greater Adelaide released by the Commission (see Relevant Extracts for APC from the Land Supply Reports)

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

Relevant Extracts for APC from the Land Supply Reports

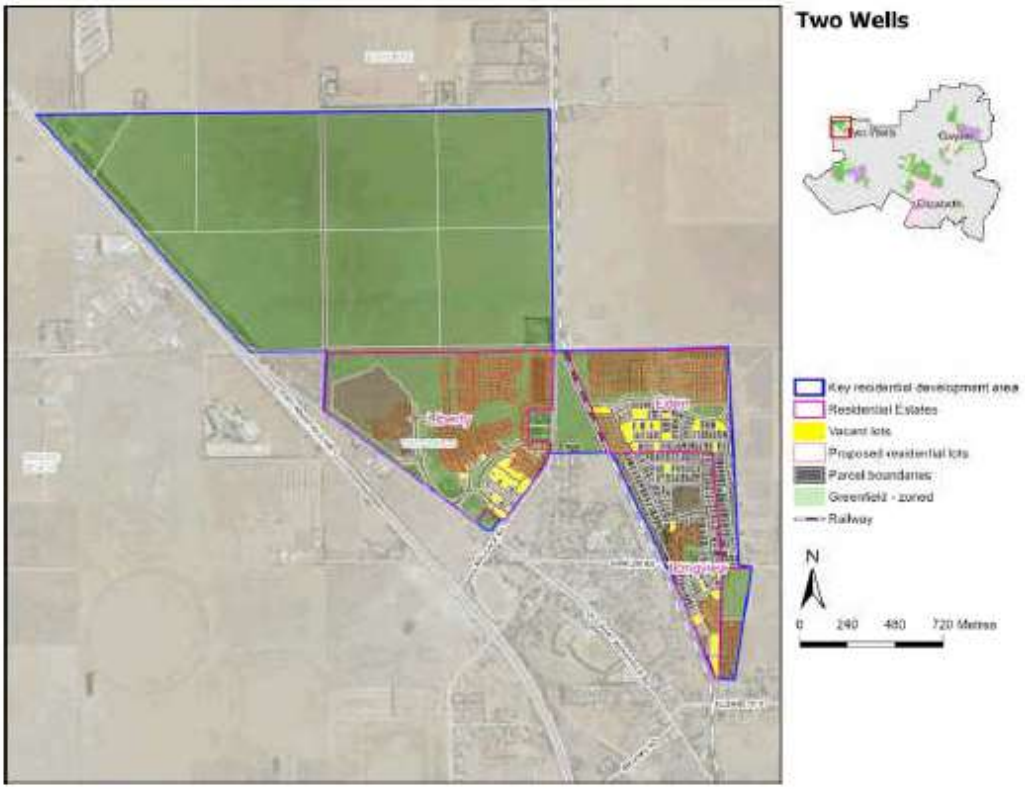
GREENFIELD



Table 4: Greenfield land supply by sub-region and key development front - Outer North, June 2020

| STATUS | DEVELOPMENT READY | | UNDEVELOPED ZONED | | FUTURE URBAN GROWTH AREA | |
|---|---|---|---|---|---|---|
| Sub Region & Development Fronts | Area (ha) | Lots | Area (ha) | Estimated Lots | Area (ha) | Estimated Lots |
| **GAWLER** | | | | | | |
| Gawler East | 180 | 1,521 | 3 | 29 | - | - |
| Gawler South | 18 | 151 | 58 | 490 | - | - |
| Evanston Gardens | 41 | 391 | 40 | 388 | 43 | 410 |
| Evanston South | 4 | 75 | 57 | 973 | - | - |
| Roseworthy | 102 | 871 | 237 | 2,030 | 29 | 248 |
| Concordia | - | - | - | - | 949 | 10,000 |
| **TOTAL** | **345** | **3,009** | **396** | **3,910** | **1,021** | **10,658** |
| **PLAYFORD** | | | | | | |
| Playford Alive | 10 | 221 | 101 | 2,278 | - | - |
| 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 | - | - |
| **TOTAL** | **350** | **4,842** | **1,299** | **20,635** | **10** | **143** |
| **VIRGINIA/TWO WELLS** | | | | | | |
| 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.

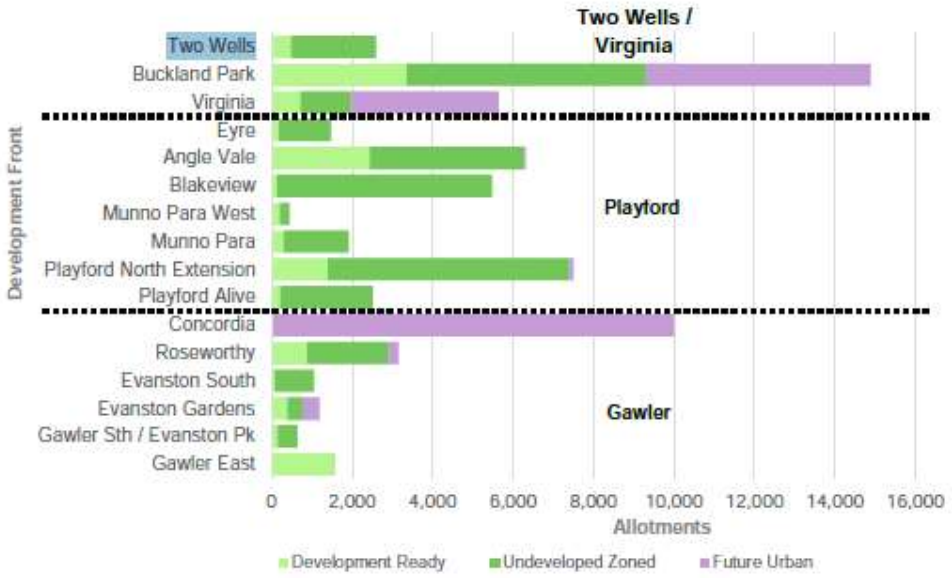
## 2.4 Greenfield land supply to 2030

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

**EMPLOYMENT LAND JOBS**

**5,500** in 2020

**ZONED EMPLOYMENT LAND**

**1,559ha**

**KEY INDUSTRY TYPES**

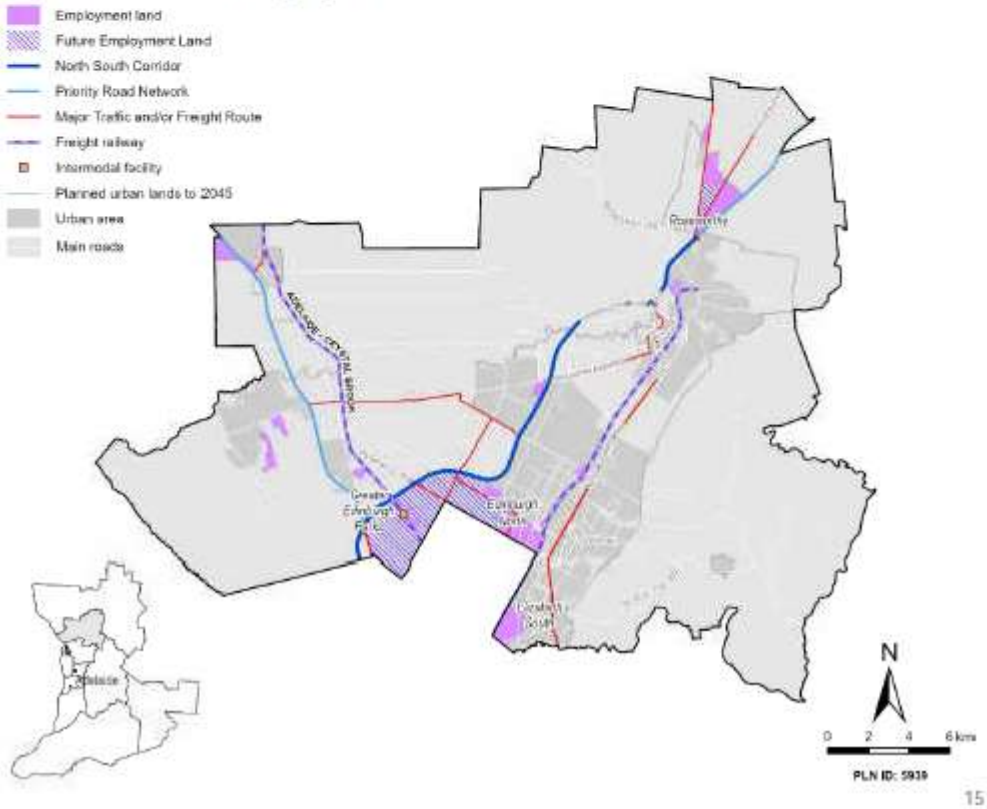
1. Manufacturing
2. Construction
3. Agriculture

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




15

**Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land**

Adelaide Plains Council

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

D19/50876

24 October 2019

BH and SA Hicks Pty Ltd
Mallala 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:-*

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."*

*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 [redacted]

Yours sincerely

[redacted]

James Miller
**Chief Executive Officer**

Adelaide Plains Council

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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 back in 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:-*

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."*

*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 [redacted]

Yours sincerely

[redacted]

James Miller
**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.<br><br>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.<br><br>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.<br><br>The Zone currently does not use any Technical Numeric Variations (TNVs) 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.<br><br>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. | 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.<br><br>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. |

<table>
<tr><th>Adelaide Plains Council Issues / Comments</th><th>Adelaide Plains Council Recommendations</th></tr>
<tr>
<td>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.</td>
<td>Site Areas and Frontage Widths<br><br>Mallala Development Plan PDC 18 – A dwelling should have a minimum site area (and in the case of residential flat buildings, an average site area per dwelling) and a frontage to a public road not less than that shown in the following table:<br><br>
<table>
<tr><th>Dwelling Type</th><th>Minimum area (square metres)</th><th>Minimum frontage (metres)</th></tr>
<tr><td>Detached (except where constructed boundary to boundary)</td><td>250 minimum</td><td>7</td></tr>
<tr><td>Semi-detached</td><td>200 minimum</td><td>6</td></tr>
<tr><td>Row dwelling and detached dwelling constructed boundary to boundary</td><td>125 minimum</td><td>5</td></tr>
<tr><td>Group dwelling and/or Residential flat building</td><td>200 minimum</td><td>No minimum</td></tr>
</table>
<br>The Code does not suitably address the minimum site areas prescribed within the current Zone.<br><br>Table 1 – Accepted Development<br><br>‘Detached dwelling’, the ‘Interface Management Overlay’ should be applied as an exception, so that a dwelling is not an accepted development in certain areas. Concept Plan 99 – Two Wells clearly identifies two areas within the concept plan that are subject to interface with existing authorised land uses (shown as ‘Buffer to Primary Industry Activity’). This includes a 500m buffer to an intensive animal</td>
</tr>
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| 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.<br><br>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.<br><br>PDC 24 within the current development plan states that:<br><br>"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.<br><br>This has also been reflected in the non-complying provisions:<br><br>"Land division where the total number of allotments created in the zone exceeds 1500 -<br><br>Except where a new road access onto Port Wakefield Road has been constructed in accordance with Concept Plan Map Mal/7 – Two Wells"<br><br>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 | Adelaide Plains Council Recommendations |
|---|---|
| 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.<br><br>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. | 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).<br><br>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.<br><br>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.<br><br>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 | Adelaide Plains Council Recommendations |
|---|---|
| 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).<br><br>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. | 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.<br><br>Fence and Retaining Wall Structure includes the following assessment criteria:<br><br>1. 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).<br>2. 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)<br>3. The structure is located behind the building line of the associated dwelling and any dwelling on adjoining land.<br>4. The structure is not located on a secondary street boundary.<br>5. 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<br><br>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<br><br>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)<br><br>Detached dwelling – 'Interface Management Overlay' should be added in the Overlay column.<br><br>Dwelling addition – should include reference to PO 1.1<br><br>Table 3 – Performance Assessed Classification<br><br>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)<br><br>Table 4 – Restricted Development Classification<br><br>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 Husbandry Zone. This request was not supported by the State Planning Commission, and the sub-zone has been retained in the 2020 revision of the Code.<br><br>Despite this there should be scope for revising/upgrading the sub-zone provisions with more of the existing Mallala Development Plan policy being incorporated since this is a unique, one-off sub-zone created specifically to accommodate Adelaide Plains.<br><br>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. | 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.<br><br>We note that the South Australian Standards and Guidelines for Breeding and Trading Companion Animals defines a large facility as:<br><br>*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.**<br><br>This could be a useful and common definition that could be used as a trigger for public notice.<br><br>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.<br><br>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.<br><br>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.<br><br>* 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:<br>• Hazard (Flooding) Overlay - covering high risk areas; and<br>• Hazard (Flooding - General) Overlay - covering areas of general flooding<br><br>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 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 | 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.<br><br>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.<br><br>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.<br><br>'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 |
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| 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 potential additional and unwarranted costs to applicants/land owners. | 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. |
| | 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.<br>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 |
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| **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.<br><br>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 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.<br><br>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 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.<br><br>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.<br><br>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 |
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| **Neighbourhood Zone** | |
| The Neighbourhood Zone applies within the residential areas of the Two Wells and Mallala townships.<br><br>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)<br><br>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.<br><br>Review the zone boundary at the rear of both Daffodil Road and Magnolia Boulevard allotments.<br><br>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)<br><br>Table 1 (Accepted Development)<br>▪ Carport – 11.0 metres<br>▪ Outbuilding – 11.5 metres<br>▪ Verandah – 11.5 metres<br>Table 2 (Deemed to Satisfy) + Table 3 (Performance Assessed)<br>▪ Carport - References DTS 10.1 which is 11.0 metres<br>▪ Outbuilding - References DTS 10.1 which is 11.0 metres<br>▪ Verandah - References DTS 10.1 which is 11.0 metres<br><br>It is suggested that these provisions are reviewed to ensure greater consistency, with the intent that Accepted Development is not provided with an increased length relative to the Deemed to Satisfy and Performance Assessed criteria. |

| Adelaide Plains Council Issues / Comments | Adelaide Plains Council Recommendations |
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| | 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.<br><br>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).<br><br>Table 2 - Ancillary Accommodation/Detached dwelling/Dwelling addition/Semi-detached dwelling should include reference to PO 1.1<br><br>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.<br><br>Table 3 - Ancillary Accommodation should include reference to PO 1.1<br><br>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.<br><br>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 |
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| | 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.<br><br>Amend the Minimum Frontage TNV to reflect the current Residential Zone site area criteria.<br><br>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.<br><br>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 transition from the existing Residential Zone – Policy Area 6. | Council does not support the transition of existing Residential Zone (excluding Policy Area 6) to the General Neighbourhood Zone. |

| Adelaide Plains Council Issues / Comments | Adelaide Plains Council Recommendations |
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| Overall, the 2020 draft General Neighbourhood Zone is considered to be an improvement from the 2019 consultation version and better reflects the current Development Plan provisions. However, there are still a number of differences that are of a concern if the Residential Policy Area 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.<br><br>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. | It is recommend that the Residential Policy Area 6 transition to the Neighbourhood Zone, subject to changes to the Neighbourhood Zone including the application of both the Design (PO 13.2) and Design in Urban Areas General Development Provisions (PO 19.2). |
| **Rural Horticulture Zone** | |
| The Rural Horticulture Zone will cover a significant part of the southern area of the Council e.g. current Policy Areas 3 & Precinct 5 of the Primary Production Zone.<br><br>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. | A TNV value for a minimum dwelling allotment size within each of the existing Horticulture Policy Area 3 (8ha) and Precinct 5 Horticulture (4ha) be spatially applied to the respective areas. |

| Adelaide Plains Council Issues / Comments | Adelaide Plains Council Recommendations |
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| | An additional Performance Outcome to be inserted into the zone to deal with stormwater runoff issues. An example of potential policy is outlined below:<br><br>*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.*<br><br>Council staff will liaise with the State Government planning staff to develop suitable policy wording during the finalisation of the Phase 3 Code.<br><br>Table 2 DTS to be updated to reference new PO (and/or DTS) where applicable.<br><br>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.<br><br>Restricted Development Table - the floor area exclusion size for a shop to revert back to the 2019 Code area of 250m².<br><br>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.<br><br>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 |
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| | 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:<br><br>*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.*<br><br>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<br><br>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.<br><br>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.<br><br>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 |
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| | '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.<br><br>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 |
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| **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.<br><br>It is recommended that a Town Centre Sub-zone for Two Wells is applied to accommodate current specific Two Wells centre provisions. | 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.<br><br>Inclusion of Concept Plan Mal/10 - Two Wells Town Centre Areas (as supplemented by and merged with Concept Plan Mal/1 - Recreation Two Wells.<br><br>Council are prepared to engage an experienced mapping consultation to prepare a suitable revised Concept Plan to be introduced into the Code.<br><br>TNV value prescribing a maximum building height spatially applied to all properties within the Zone.<br><br>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.<br><br>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 |
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| | 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 uses to ensure that they avoid adverse impacts upon adjoining rural activities.<br><br>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, they come with a level of complexity when considering how to manage interface issues between them. The 'Guide to the Draft Planning and Design Code – October 2019' states that the 'new rural based zones will contain policies about rural interface management'. It is considered that 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.<br><br>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. | 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 issues, particularly between farming and horticulture activities. (Council staff are happy to be involved in the review process)<br><br>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.<br><br>Recommended that the Rural Zone - DTS/DPF 12.1(d) be reinstated as 250m² to reflect the 2019 draft Code criteria and provide a size more suitable for a Deemed to Satisfy assessment pathway. |

| Adelaide Plains Council Issues / Comments | Adelaide Plains Council Recommendations |
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| | Recommend that Table 5 – Procedural Matters (Notification) in both the Rural Zone + Rural Horticulture Zone be amended to incorporate the following:<br><br>• 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)<br><br>Recommend that Table 5 – Procedural Matters (Notification) in the Rural Zone be amended to incorporate the following:<br><br>• 'Horticulture' exceptions should state – 'Horticulture that is unable to satisfy Rural Zone DTS/DPF 3.1 (d), (e) and (f)'<br><br>• 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 |
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| 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.<br><br>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.<br><br>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.<br><br>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 |
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| **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). |

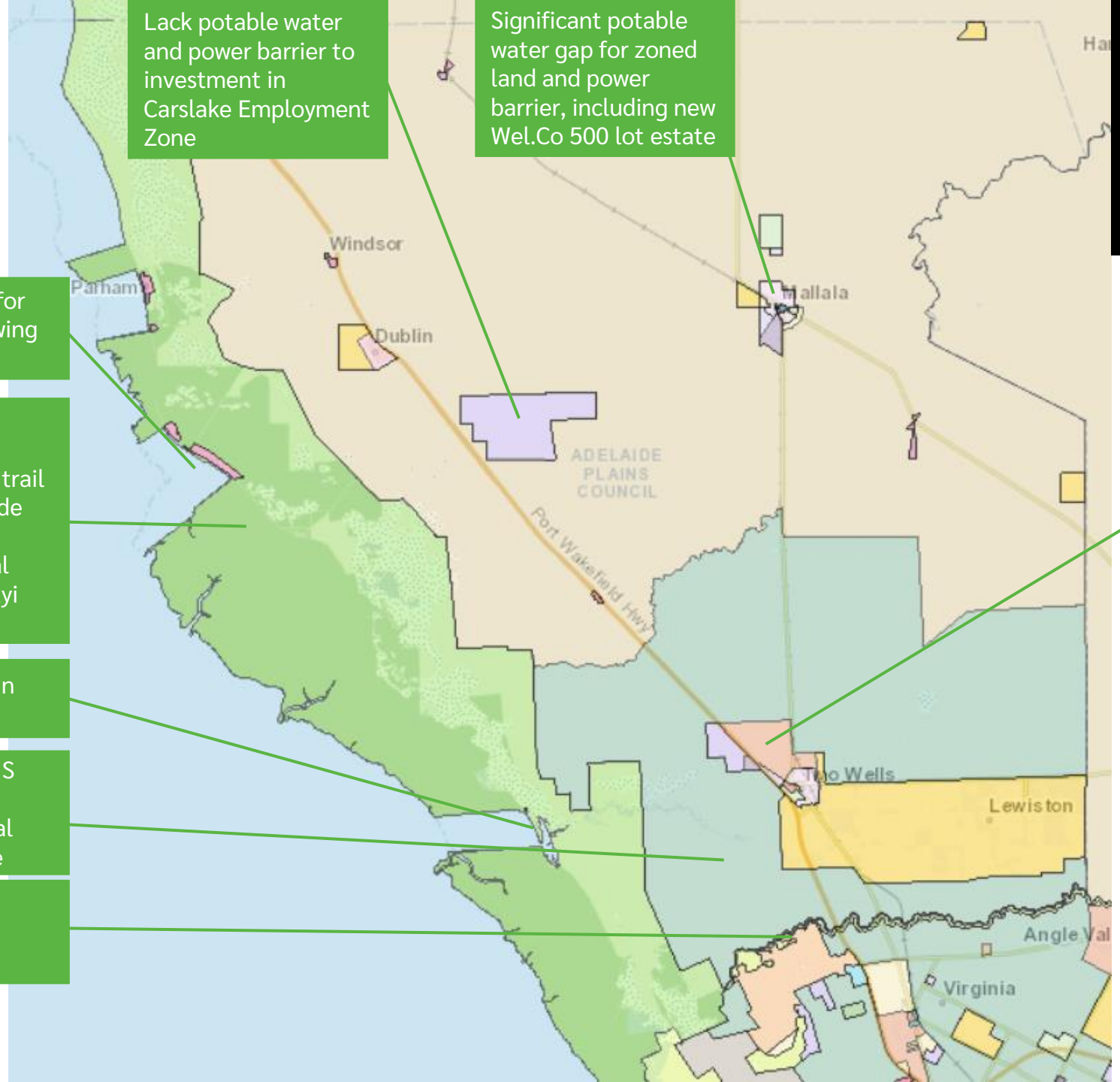
Attachment A – Revised Animal Husbandry Sub-Zone

Attachment B – Mallala Motorsport Park Sub-Zone

Attachment C – Two Wells Town Centre Sub-Zone

# INFRASTRUCTURE CHALLENGES

For Housing Infrastructure Planning & Development Unit 13 November 2023




Lack potable water and power barrier to investment in Carslake Employment Zone

Significant potable water gap for zoned land and power barrier, including new Wel.Co 500 lot estate

No potable water for zoned land in growing Thompson Beach

Inadequate visitor infrastructure e.g. signage, facilities, trail network, in Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara

No potable water in Middle Beach

Price point for NAIS water to enable investment in Rural Horticultural Zone

Gawler River flood management infrastructure

Two Wells zoned land

- Investment needed Primary School, Ambulance, SAPOL & CFS/SES, expanded Oval precinct
- No sewer in original township. Hickinbotham/Alano CWMS exists. LGA funding about existing development, not growth.
- GARP flags even more growth

Timeliness of road infrastructure upgrades, e.g. Two Wells Roundabout

Public community and active transport infrastructure and services

State level International Equine Centre

Adelaide Plains Council

22 November 2023

Mr Craig Holden

Chair, State Planning Commission

Sent via email: plansasubmissions@sa.gov.au and infrastructure@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.

**Alexandrina Council**
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### *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

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

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:

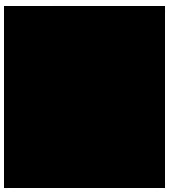
- The identification of Goolwa as an 'investigation area' for growth beyond our existing already significant 'town boundaries' .
- Coordination with the State Government's *20–Year State Infrastructure Strategy*. The infrastructure challenges and deficiencies in servicing our existing population and 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

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**

Keith Parkes

**Mayor**

## 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.

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.***

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***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

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

possible, should this service become available. Economic feasibility of this opportunity may prove to be more financially viable than other broader investments.

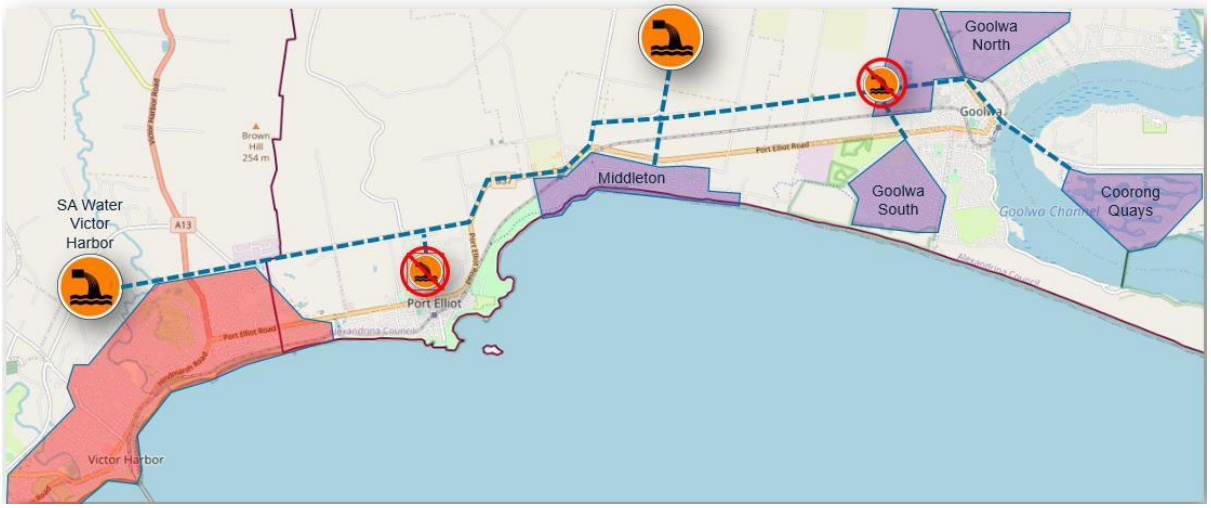
Strategic decisions and opportunities should be addressed now as a matter of urgency. Council's water utility has highlighted opportunities and risks of growth within the region. Projected capital investment over the next 10 years for the Southern Fleurieu is in the order of $8-15M. None of this investment 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.

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.

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.

### 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.***

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## 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

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** -*

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.***

CITY OF ADELAIDE

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20 November 2023

Mr Jeremy Conway
Chief Executive
Infrastructure SA
GPO Box 2343
ADELAIDE SA 5001

Attention: Strategy Team

Via email: infrastructure@sa.gov.au

Dear Mr Conway

City of Adelaide welcomes the opportunity to provide input into the creation of the next 20-year State Infrastructure Strategy (the Strategy) through feedback on the State Infrastructure Strategy Discussion Paper (Discussion Paper).

City of Adelaide recognises the importance of infrastructure to environmental, economic, cultural and social development of the city. We note the context the megatrends outlined in the discussion paper provide. The themes of enabling infrastructure, liveable and well-planned places and improved resilience align with proposals currently being progressed by the City through Infrastructure SA, regarding the Adelaide Bridge and Torrens Weir. These megatrends are also relevant to the shared ambition the City has with the State Government to grow the city's resident population to 50,000 by 2036 and provide the enabling infrastructure that will support the more than 300,000 current daily users of the city that are forecast for potential growth to up to 600,000 across the same period.

We also note the megatrend focus on the economic context and we see that investment in infrastructure should support population growth in the city centre given the already significant contribution to Gross State Product by the city. It is critical for infrastructure to be planned and designed to enable effective short and long-term decision making and respond to global trends including transition of infrastructure to meet the State's net-zero emissions target.

This submission focusses on the need for collaborative and coordinated strategic investment and outcomes across all tiers of government and highlights opportunities to partner with the City of Adelaide on key strategic priorities. The submission is based on City of Adelaide's significant evidence base developed through its emerging City Plan and ongoing infrastructure planning.

City of Adelaide acknowledges the State Government's foresight to release both the Greater Adelaide Regional Plan (GARP) Discussion Paper and State Infrastructure Strategy Discussion Paper concurrently such that infrastructure planning and investment can support delivery of the GARP. Council's submission on the GARP is enclosed with specific references below.

**City of Adelaide Strategic Plan 2024-2028**

With a vision for Adelaide to be bold, aspirational and innovative the draft City of Adelaide Strategic Plan 2024-2028 charts a course for Council to achieve its long-term goals across the economy, environment, for our places, and throughout our community.

The draft Strategic Plan aspires to improve our streetscapes, deliver economic viability for businesses, help property owners to better utilise and profit from their investment and boost residential access, affordability and amenity.

The draft Strategic Plan also maps out how Council can maintain its assets, reduce kerbside waste, achieve zero functional homelessness, and sensibly increase our population to 50,000 people by 2036.

The draft City of Adelaide Strategic Plan 2024-2028 is currently undergoing public consultation.

In addition, the City of Adelaide recognises the alignment of the Discussion Paper Objectives with plans and strategies that the City of Adelaide is currently undertaking. These include:

- City Plan
- Integrated Climate Strategy
- Economic Development Strategy
- Housing Strategy
- Homelessness Strategy
- Adelaide Park Lands Management Strategy
- Integrated Transport Strategy
- Social Infrastructure Assessment – (Community Facilities)
- Disability Access and Inclusion Plan
- Cultural Strategy

These documents all have a close relationship with the Infrastructure Strategy with key details outlined further in this submission.

**City Plan – Adelaide 2036 and Greater Adelaide Regional Plan**

City Plan – Adelaide 2036

City Plan will be a ten-year spatial plan that identifies the future land uses and built form of the city as we grow to a city of 50,000 residents by 2036.

City Plan is being developed in collaboration with stakeholders across all levels of government, community and business and has been supported by funding through the Capital City Committee.

City Plan will guide future decision making on infrastructure provision in the city and provides a comprehensive digital database on which evidence-based infrastructure investments can be pursued.

Greater Adelaide Regional Plan Discussion Paper Submission

City of Adelaide's submission to the GARP Discussion Paper identifies priorities and recommendations based on seven City Focus Areas (enclosed).

As detailed in the submission, each of these areas has key infrastructure outcomes that are needed to support the long-term development and liveability of the city.

Through the GARP submission, the City of Adelaide is seeking for City Plan to be recognised as a sub-regional plan of the GARP. This will enable spatial opportunities for infrastructure provision/services identified in City Plan to be incorporated into long-term infrastructure planning.

**Key Infrastructure Projects**

To enable city growth, it is critical that the City of Adelaide and State Government continue to partner in infrastructure projects, including the following key infrastructure projects of State significance:

- Adelaide Bridge and Torrens Weir Renewal/Rehabilitation
  - The City of Adelaide has progressed discussions in relation to funding approaches for these two key projects that connect the City with North Adelaide.
- Tram extension to North Adelaide
- North Terrace West Revitalisation
- Currie-Grenfell Corridor Upgrade
- Housing and social infrastructure for a growing resident population
- Programmed investment in the Adelaide Park Lands
- Main Street Revitalisation Projects
  - Hindley Street
  - Hutt Street
  - O'Connell Street
  - Melbourne Street
  - Gouger Street.

**Housing**

City of Adelaide recognises that access to appropriate, affordable and sustainable housing for residents of all ages is key to achieving economic development and population ambitions.

Recent investigations by the City of Adelaide for the development of a draft Housing Strategy and recent submissions to State and Federal Government inquiries into housing have identified that a focus on public and private investment in housing is needed including acknowledging social housing and affordable housing as essential infrastructure to appropriately house all Australians.

City of Adelaide is committed to making appropriate interventions to foster and grow a new affordable rental asset class. Council has identified opportunities for partnership with State Government and community housing providers to facilitate these outcomes.

Council is also committed to creating housing outcomes through adaptive reuse of existing buildings. Through the Capital City Committee, the State Government and City of Adelaide have jointly funded the City Housing (Adaptive Reuse) Initiative to explore and progress adaptive reuse outcomes, including shop top housing, with an ambition to support delivery of 50 dwellings annually.

CITY OF ADELAIDE

**Transport**

Movement to and within the city increasingly must recognise the climate and social impacts of car-dominated travel modes and provide suitable alternative transport to the city.

Prioritising pedestrian, cycling and personal mobility movement in the city will enhance South Australia's reputation as a place to live and visit.

The 2021 Census indicated that commuter trips to the city are relatively short, and the current mode split reflects the relative convenience and safety of active and public transport networks. It is therefore critical to City of Adelaide that there is a strategically planned and integrated public and active transport network for Adelaide, including:

- Development of a package of cycle routes linking the suburbs to the City of Adelaide to submit to Infrastructure Australia for funding.
- Cycle-public transport integration, with a public transport network planned together with safe cycling access. Cycle-public transport trips are a scalable replacement of significant levels of driving. Cycle access can be relatively fast, flexible and cover larger stations catchments, and provide an opportunity for enjoyable, incidental physical activity, while train use can also be a utility (while time spent driving is a disutility).
- Commitment to extension of the tram network within the city and to connecting suburbs.
- Planning for active and public transport networks needs to be coordinated with social infrastructure with a focus on accessibility, including for children (and children's independent mobility) as a transport, health, inclusivity, decarbonisation and sustainability outcome.
- Planning and electrical infrastructure upgrades for rapid transition to electric vehicles, bicycles and micro-mobility.
- 20 Year Infrastructure Strategy and Strategic Assessment framework should also consider social equity and the links between transport and health and sustainability.

**Adelaide Park Lands**

The Adelaide Park Lands are of State significance with a specific legislative framework, the *Adelaide Park Lands Act 2005* (SA).

The Adelaide Park Lands Management Strategy (APLMS) identifies key moves, design and planning principles and investment opportunities including partnerships with the Capital City Committee and State Government.

The APLMS also identifies "return to Park Lands" areas, including definitions to assist in identifying return area opportunities and increase public access to the Adelaide Park Lands.

A shared State and local government investment program that protects and enhances the natural, social and cultural values of the Adelaide Parks Lands is a key opportunity to be pursued through the State's Infrastructure Strategy. As Greater Adelaide and the city grows, demand on the Adelaide Parks Lands is increasing and recognition of this important green infrastructure and the blue infrastructure that runs through it and supports it, is required to safeguard its value for future generations in a changing climate. Investment should consider climate resilience, increasing tree canopy and extension of access to sustainable water supplies.

The State Infrastructure Strategy should acknowledge the important role of Karrawirra Pari as a significant natural asset that underpins the ecological vitality, community vibrancy and economic attractiveness of the city and South Australia.

**Social Infrastructure**

To meet the shared growth targets of City of Adelaide and the State Government, a more coherent and consistent approach to planning and delivering social infrastructure is required. This would support the aspiration for a more equitable city, as well as help to deliver the vision for 'living locally' identified in the GARP Discussion Paper.

South Australia needs more effective and systemic mechanisms for this category of infrastructure delivery. There hasn't been a shared resource to inform social infrastructure planning in South Australia since the 1990s (Human Services Planning Kit). Despite being around 30 years old, this tool is still used by some consultants in SA, along with interstate social infrastructure planning tools that were designed for very different contexts.

The City of Adelaide believes there is a need to develop contemporary planning methods, definitions, resources, processes, and funding mechanisms for social infrastructure which are tailored for South Australia and address community needs.

Key opportunities for improvements to social infrastructure in the city identified through recent investigations undertaken by the City of Adelaide include:

- A child and family health service facility in the city
- Youth facilities in the city
- Education opportunities and requirements in the city
- Primary health care facility in the city.

**Strong Cultural Infrastructure**

City Deals have successfully delivered cultural infrastructure outcomes for other cities. There may be potential to leverage the development of the 20 Year State Infrastructure Strategy to support Council's future vision for a dynamic, creative city culture. City of Adelaide has recently scoped a cultural infrastructure investigation and needs analysis to be finalised in 2023 that will assist in planning for short term and long-term infrastructure works.

This may include:

- Advocacy for a new fit-for-purpose Concert Hall (a priority for the Adelaide Symphony Orchestra) - Adelaide is an outlier among capital and regional cities in this respect.
- Enhancement of shared collaborative arts and cultural spaces for the community, and potentially affordable arts accommodation for the sector.
- Investment in event infrastructure, across the city and Adelaide Park Lands, including progress of a sound shell or similar.

As a capital city we recognise the need for strong multilateral partnering across the three tiers of Government. We will work with the State Government to find opportunities to jointly enhance Adelaide's cultural infrastructure, with a particular focus on the arts. We would also welcome increased focus on aligning shared objectives with the Federal Government to progress positive outcomes for Adelaide and South Australia.

CITY OF ADELAIDE

**Digital Connectivity Infrastructure**

City of Adelaide is a local government leader in identifying and implementing leading-edge digital connectivity infrastructure. As stated in the Discussion Paper, there is a need for businesses to access secure and reliable digital infrastructure to leverage new and emerging technologies, and the State Government should be advocating with large public cloud providers such as Microsoft and AWS to establish local regions within the State. By bringing a local region to the State, it will enable safer, faster and more reliable access to leading technologies such as generative AI, machine learning etc.

State Government should also be aware of the significant investment by the City of Adelaide in the form of Ten Gig Adelaide, which provides high-speed enterprise grade services to 1000 buildings. State Government could consider partnering with City of Adelaide to extend this type of service to key state and regional high-tech areas in a hub and spoke model that would improve access to high skilled labour.

City of Adelaide has also enabled the largest public wi-fi service in Adelaide which could be leveraged at a State level, to provide a state-wide free public wi-fi network for access by tourists, visitors and the people without.

Digital Identity is another element that should be considered when trying to ensure that citizens in the State can access secure and reliable government and non-government services.

Digital connectivity will assist in ensuring the city and State remain globally competitive and delivers on the State's Economic Statement and Council's economic development priorities.

**Health, Bio-Med and Innovation Precincts**

The State Government's planned investment in health and the bio-medical precinct, along with investment in other innovation and economic precincts should deliver exemplary public benefit, including appropriate siting and design of such investment.

**Universities**

The State Infrastructure Strategy can contribute to the successful creation of Adelaide University through deliberate investment to create open campuses that contribute to city life, connection and public realm.

**Airport and Airspace Infrastructure**

Adelaide Airport and helipads of strategic significance within the City of Adelaide should be identified and recognised in the 20 Year State Infrastructure Strategy, to enable greater integration with the SA Planning System. wIt will also be important to continue to maintain an appropriate interaction between development approvals and airport and helipad operations for example development height (including temporary construction crane height) and noise.

Airport and airspace infrastructure should seek to interact appropriately with the NASAG National Airports Safeguarding Framework. Airport and helipad infrastructure should continue to incorporate customer experience improvements from a disability access and inclusion perspective, to ensure Adelaide and South Australia is a destination of choice

for business, conferences and tourism. Continuing investment in a climate-ready aviation industry is an additional opportunity to reinforce Adelaide's credentials as a low-carbon and net-zero destination.

**Sustainability**

Capitalising on the State's world class renewable energy grid and decarbonization of the economy is an ambition the City of Adelaide shares with the State Government. This includes a more circular economy, and delivery of infrastructure that is environmentally responsible and sustainable.

In this context and in considering transport, increased investment in the transition of transport to electric and other renewable formats, with a focus on public transport will be welcomed, which could also see support for future autonomous transport loops. We believe the CBD is well poised to promote and support such approaches to future transport.

State-wide standards for infrastructure design and leading sustainability practice in government-led projects is needed to signal the State's intent to other sectors and increase the speed with which infrastructure sustainability is achieved.

**Next Steps**

The City of Adelaide requests an on-going collaboration with Infrastructure SA through the development of the 20-Year Infrastructure Strategy to ensure effective coordination of infrastructure planning and delivery.

If you have any queries in regard to the matters raised in this submission please contact Ilia Houridis, Director City Shaping on [redacted].

Yours sincerely

[redacted]

**Clare Mockler**
Chief Executive Officer

Enclosed:

1. City of Adelaide Submission – Greater Adelaide Regional Plan Discussion Paper
2. City of Adelaide Strategic Plan – 2024-2028 (draft for consultation)

# Greater Adelaide Regional Plan Discussion Paper

City of Adelaide Submission
November 2023

CITY OF ADELAIDE

# 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.

CITY OF
ADELAIDE

# 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.

City Focus 1

## 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

City Focus 1

# 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.

## What City of Adelaide is already doing

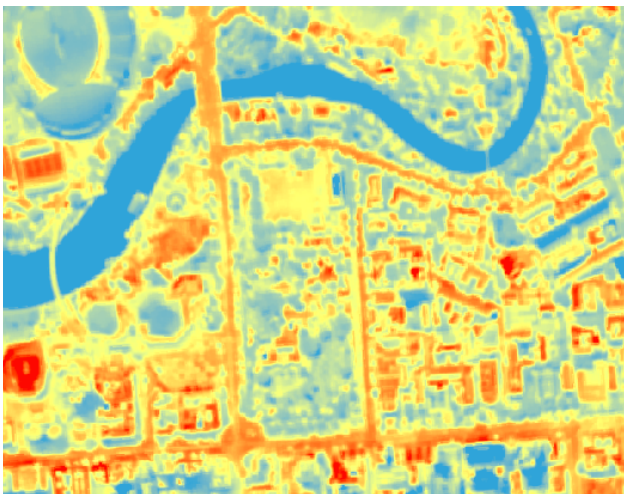
- Integrated Climate Strategy
- Working with community and business networks
- City Housing (Adaptive Reuse) Initiative exploring re-purposing and reuse of existing buildings to support sustainability objectives including carbon capture, capitalising on existing capital investment, reducing landfill 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

City Focus 2

# 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.

## What City of Adelaide is already doing

- 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

City Focus 3

# 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.

## What City of Adelaide is already doing

- 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.

City Focus 4

# 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.

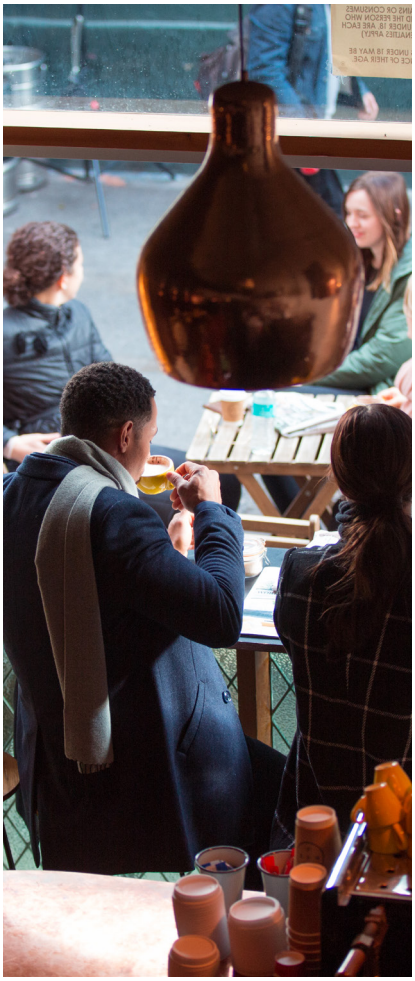
## What City of Adelaide is already doing

- 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.



City Focus 5

# 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.

## What City of Adelaide is already doing

- 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.

City Focus 6

# 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 light-rail 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.

## What City of Adelaide is already doing

- 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.

City Focus 7

# 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

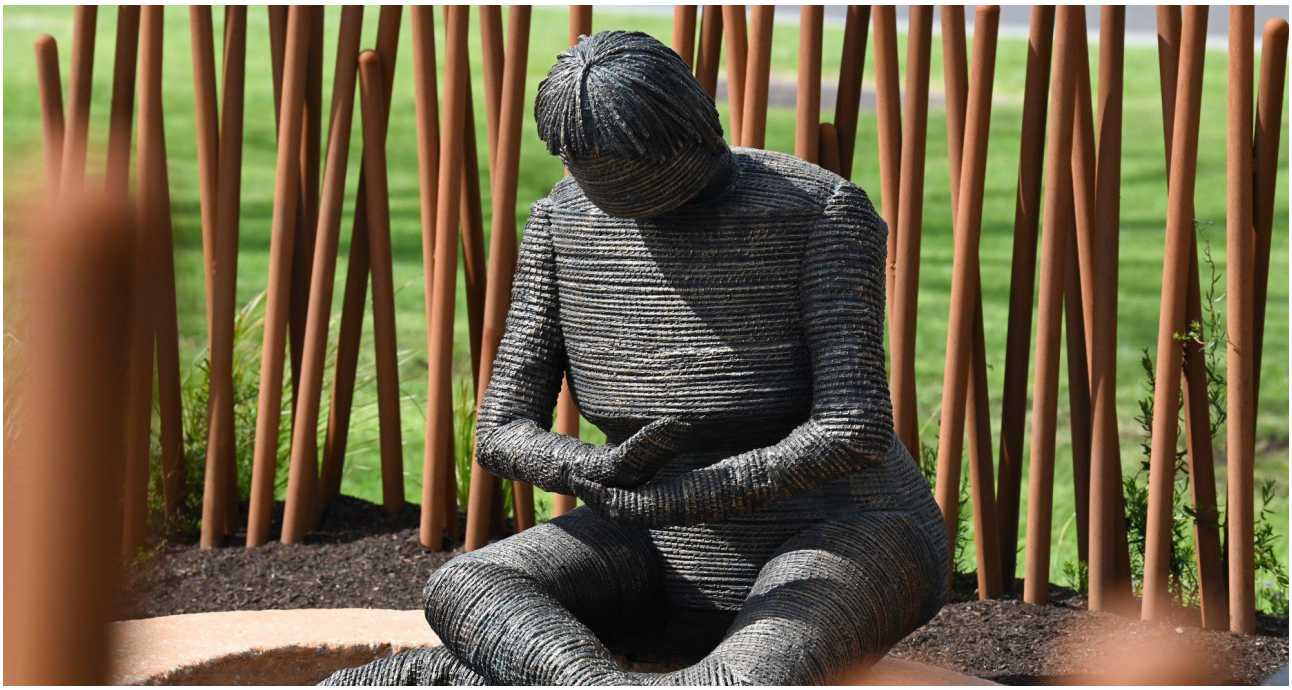
## City of Adelaide Priorities

### 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.



## What City of Adelaide is already doing

- '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.

CITY OF
ADELAIDE

City of Adelaide

# Strategic Plan 2024–2028

Our Adelaide.
**Bold.**
**Aspirational.**
**Innovative.**

CITY OF ADELAIDE

As the capital city of South Australia,
Adelaide has a vital role to play in shaping the future of our state.

# Our Adelaide.
# **Bold.**
# **Aspirational.**
# **Innovative.**

Achieving our vision for the future will be guided by our long term aspirations:

## Our Community:

**Vibrant, connected and inclusive**

In ten years Adelaide will be a growing and thriving Capital City with more residents and visitors. Year-round events and world-class amenities will create vibrancy, support community development and connections, and celebrate our culture, heritage and diversity.

## Our Economy:

**Growing, innovative and responsive**

In ten years Adelaide will be the strong economic focal point of the state, attracting investment and talent from around the world. New and diverse industries will complement and build on our economic strengths and city businesses will be successful and connected to global opportunities.

## Our Environment:

**Resilient, protected and sustainable**

In ten years Adelaide will be a nation leading Green City in a Park showcasing our advanced green infrastructure, increased biodiversity and sustainability and a community that is more resilient to climate change.

## Our Places:

**Interesting, purposeful and safe**

In ten years Adelaide will be a diverse collection of unique or distinctive neighbourhoods and precincts that are connected and accessible. Our public spaces will be designed for people, making them safe and lively and a reflection of our history and identity.

**Supported by:**

## Our Corporation:

**High performing, customer-centric and bold**

In ten years people will seek us out as an exciting and trusted employer and partner of choice with a reputation for excellence and achievement. The Corporation will be sector leading in transparency, financial sustainability and accountability.

# Kaurna Acknowledgement

**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.**

City of Adelaide acknowledges the traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past and present. 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. And we also extend that respect to other Aboriginal Language Groups and other First Nations.



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# Lord Mayor Introduction

Shaping the future of a city requires bold thinking and long-term planning.

The capital city council is custodian of the heart of our state and it's up to us to be both aspirational and audacious in our vision for Adelaide's CBD.

But we also need to deliver on the core business of council – roads, rates, and rubbish – if we want to be bold in other areas and live in a city of which we can be proud.

The City of Adelaide's Strategic Plan 2024–2028 charts a course for our Council to achieve its long-term goals across the economy, the environment and throughout our community.

This Strategic Plan aspires to improve our streetscapes, deliver economic viability for businesses, help property owners to better utilise and profit from their investment and boost residential access, affordability and amenity.

The Plan also maps out how Council can maintain its assets, reduce kerbside waste, achieve zero functional homelessness, and sensibly increase our population to 50,000 people by 2036.

It's also about providing certainty for business owners, potential investors, and residents – matched by a commitment to deliver on our promises.

Our residents, workers, and visitors are also an important part of our Strategic Plan, and we valued your feedback during the consultation period.

The Strategic Plan gives us an opportunity to choose a different trajectory for Adelaide, and its future over the next four years.

But importantly, it will be our promise to deliver on our commitments.

**Dr Jane Lomax-Smith AM**
Lord Mayor City of Adelaide

# Council Members

Our Council Members for the 2022–2026 term of Council:

*From left to right:*

Councillor Mary Couros (North Ward), Councillor Arman Abrahimzadeh OAM (Area), Deputy Lord Mayor Keiran Snape (South Ward), Councillor Simon Hou (Central Ward), The Right Honourable Lord Mayor of Adelaide Dr Jane Lomax-Smith AM, Councillor David Elliott (Central Ward), Councillor Carmel Noon (Central Ward), Councillor Henry Davis (South Ward), Councillor Phillip Martin (North Ward), Councillor Janet Giles (Area), Councillor Dr Mark Siebentritt (South Ward), Councillor Jing Li (Central Ward)

# Our City

The City of Adelaide is the capital of South Australia and the heart of the state's civic, cultural and commercial life. This Strategic Plan acknowledges that as a capital city council we need to manage our responsibilities to our 26,000 residents and to all 1.7 million South Australians.

## We are bold, aspirational and innovative.

Built on the traditional lands of the Kaurna people with a rich and deep Aboriginal heritage, Colonel Light planned Adelaide in 1837 with an inspired idea: an active city centre and an abundance of open space with the River Torrens at its heart. Colonel Light laid out the streets surrounded by Park Lands with squares and gardens to create balance in our built and natural form. The Park Lands are now nationally heritage-listed and are cherished for their beautiful amenity, array of uses and unique role as a gateway to the city.

Our iconic Adelaide Central Market, Rundle Mall and Park Lands provide commercial, social and green spaces for people to meet, play and relax. Adelaide is an attractive, contemporary city which embraces quality design innovation while recognising and valuing the city's cultural and built form heritage and the unique features of Colonel Light's plan.

Adelaide is known for being progressive, resilient, bold, trailblazing and enterprising. This strong Adelaide spirit has seen us withstand the times of global social and economic disruption, and emerge with a reputation for being a leading commercial, knowledge sharing and ideas exchange city.

We aspire to strengthen what we know makes Adelaide one of the world's most liveable cities. We are leveraging our past and looking to the future to grow an exceptional Capital City that all South Australians can be proud of.

## Our City

**760ha**
**Park Lands** including 29 parks and six squares

**15.6km2**
total land area

**14,660**
private dwellings

**12,265**
local businesses

**$21.9 Billion**
City of Adelaide Gross Regional Product.
17.6% of Gross State Product

**157,498**
jobs

## Our Community

**26,120**
residents

**47%**
aged between 18 and 34

**20%**
aged 60 and over

**45%**
born overseas

**36%**
speak a language other than English

**26%**
study at Tafe or University

**50%**
renting

# Our Opportunities

This Plan has been developed in a time of change and uncertainty for our city and community – the post pandemic environment, inflation forecasts, housing crisis and climate change are at the top of Council's agenda. These challenges bring new opportunities.

Over the next decade our population will grow and become more diverse. Health, wellbeing, equity and inclusion will continue to play important roles in supporting a changing population. We will need new developments to provide quality housing for a projected 50,000 residents in the near future. Our City Plan will guide where this growth should occur, complemented by revitalisation of our streets and precincts where year-round events and quality amenities will create vibrancy and celebrate our rich culture.

Our city in the future will be an interconnected collection of unique neighbourhoods and precincts which offer diverse local experiences. We will promote social connectivity by making sure our streets are lively and accessible and putting people and nature first when we design our public spaces.

Action on climate change has become more urgent and we will support our city to adapt and be climate resilient. We will ensure that our residents and visitors are prepared, and where possible protected, from hazards such as heatwaves. Adelaide can be a nation leading Green City in a Park with new ways to re-use old buildings and a greener built form, supporting a circular economy and low-carbon city.

Uncertain global economic conditions generated from COVID-19 recovery, resource and labour shortages, disrupted supply chains, interest rate rises, international conflicts and geo-political tensions, are likely to continue impacting national and local economies. These challenges have encouraged us to re-consider how we procure, how we develop our local workforce, how we can be financially sustainable and how we partner across all levels of government and with private enterprises.

We will focus on our economy and how people are choosing to work, emerging industries and the ongoing digital transformation through artificial intelligence and cashless transactions. We will support an inclusive, equitable and thriving economy, enabling current and emerging businesses to be innovative and globally competitive.

By being bold in how we respond to the challenges that will unfold over the coming years, we will create new opportunities that will have a transformative impact on our city, community and businesses.

# Our Role

The City of Adelaide has developed this Strategic Plan (the Plan) as guided by the *Local Government Act (SA) 1999*, which requires councils to develop and adopt plans for the management of its area, informed by the provisions of the *City of Adelaide Act 1998*. This Plan is supported by a Resource Plan which guides the finance, infrastructure and resources that underpin delivery over the next four years, as well as a suite of longer-term interconnected vision and economic plans.

This Plan is not only for Council, it is a Plan for our ratepayers, residents, visitors, workers and all key stakeholders. As the Capital City Council for all South Australians, we need to be outward looking, to work collaboratively with Federal, State and Local Governments and to demonstrate excellence, innovation and exceptional service provision.

This Plan reflects our commitment to working with others to shape the future of our City for the benefit of the whole State. We will continue to build strong partnerships to advocate for the benefit of the city and leverage our relationships to seek co-investment, grants and contributions to the benefit of our community. Key partnerships include those with the Federal, State and Local Government sectors, and strategic non-government (private sector, community groups and not-for-profit) organisations.

In developing this Plan we have considered our diverse and complex roles and the levers we can use to implement and influence change.

The City of Adelaide is a:

- Leader: Developing strategies, policies, programs and services that chart a clear course for Adelaide.
- Owner/Custodian: Managing community assets that are entrusted to Council.
- Regulator: Undertaking our role under State legislation to keep the city safe, clean and orderly.
- Information Provider: Providing information about Council and the city to the general community and stakeholders.
- Advocate: Representing the interests of our community to influence issues/opportunities that impact our city.
- Facilitator/Initiator: Bringing together and engaging with individuals, community groups, industry, government agencies and other stakeholders to address issues impacting the city.
- Agent: Providing of services to the community on behalf a third party (e.g. State or Federal Government) where there is demonstrated need and significant benefit to the community.
- Direct Provider: Delivering our core services, projects or programs.
- Partner: Working with others to deliver services, programs or projects outcomes.

# Our Response

Over the past decade, we have heard from our community that our city must grow if we want to thrive, but this growth should not come at the expense of what has made our city one of the most liveable in the world.

To ensure we maintain our liveability and to support growth, these principles will underpin everything we do:

- Exceptional Amenity – Be bold and courageous in our pursuit of excellence for our city.
- Quality Housing – Strive for liveability and affordability to attract and retain residents.
- Community Connection – Strengthen connection, accessibility, diversity and inclusivity by putting people first.
- Unique Experiences – Create interesting experiences for our residents, workers and visitors.
- Climate Resilience – Embed climate resilience in all that we do.
- Economic Growth – Encourage innovation, investment and development in current and emerging sectors.
- Budget Repair – Provide quality services and ensure long-term financial sustainability.

# Our Community

## Vibrant, connected and inclusive

Our Objective is to:

- Support our communities to thrive
- Create fun, lively and interesting experiences
- Celebrate and honour community and cultures

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Drive affordable, safe and quality housing outcomes that attract and retain residents in our city** | Work with partners to identify new and innovative ways to reduce rough sleeping and homelessness<br><br>Contribute towards achieving Zero Functional Homelessness<br><br>Support increased residential growth and housing affordability through partnerships and advocacy<br><br>Reduce rental pressures by increasing housing supply and unlocking properties for long-term tenants | Attract investment to deliver 600 affordable rental properties by 2028 in line with Council's Housing Strategy<br><br>Increase the use of the City of Adelaide or State Government incentive schemes or grants to increase diversity in housing, public realm, sustainability and community facilities in line with Council's Housing Strategy<br><br>Increase the number of people living in the city from 26,000 to 50,000 by 2036<br><br>Reduce the incidences of people sleeping rough or experiencing homelessness to functional zero by 2026 in line with Council's Homelessness Strategy<br><br>Increase the share of family households from 12.5% to 15% living in the city<br><br>Support 29 State Government housing outcomes per month in the City of Adelaide for people experiencing homelessness to 2026 in line with Council's Homelessness Strategy |

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **An interesting and engaging place to live, learn and visit** | Enable community-led services which increase wellbeing, social connections and participation in active lifestyles, leisure, recreation and sport<br><br>Drive social change and strengthen communities through locally-led arts, cultural and recreational activities<br><br>Elevate the City's reputation for exceptional and unique arts and cultural experiences by encouraging and providing arts, culture and events partnerships, grants and sponsorship opportunities<br><br>Lead and create opportunities for people to expand knowledge, learn, and master new skills | Increase in residents' wellbeing from 70% to 75% life satisfaction<br><br>Develop a target for increasing participation in arts, events and cultural experiences facilitated or supported by the City of Adelaide<br><br>Review the Active City Strategy by 2025<br><br>Develop an overarching grants policy to support diversity in arts, culture, community development, recreation and wellbeing by 2025<br><br>Amplify Adelaide's status as a UNESCO City of Music<br><br>Investigate opportunities for a Centre of Music<br><br>Review library and community centre service delivery model to better meet the evolving community's need by 2025<br><br>Develop a Community Wellbeing Plan by 2026<br><br>Increase the diverse opportunities for volunteer participation in line with the Volunteering Australia national standards |
| **An inclusive, equitable and welcoming community where people feel a sense of belonging** | Champion Reconciliation and recognition of Aboriginal and Torres Strait Islander peoples and culture by identifying opportunities to celebrate and elevate Kaurna culture and connection to Country<br><br>Celebrate and elevate our community culture and the profiles of multicultural communities and create welcoming programs and services<br><br>Support belonging through an inclusive and welcoming community that recognises diversity and enables people of all abilities living, working and visiting the city<br><br>Create sustained, respectful, and inclusive opportunities that encourage full participation of people from diverse backgrounds in the cultural and social life of the City by ensuring our services and projects are accessible and inclusive for all | Establish and deliver a new Stretch Reconciliation Action Plan by 2024<br><br>Develop a target to increase the number of Aboriginal and Torres Strait Islander-led community reconciliation activities<br><br>Support Aboriginal and Torres Strait Islander employment at the City of Adelaide to be higher than 2%<br><br>Promote multicultural events and activities in our city<br><br>Establish a new Diversity, Access and Inclusion Plan by 2024<br><br>Develop a Social Infrastructure Policy by 2024 to support our current and emerging community needs<br><br>Develop a Cultural Policy by 2024 that promotes and supports the City's unique cultural identity and opportunities |

# Our Environment

## Resilient, protected and sustainable

Our Objective is to:

- Protect, enhance, and activate our Park Lands and open space
- Be climate conscious and resilient
- Prioritise sustainability in our decisions for the future

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Lead as a Low Carbon Emissions City** | Implement sustainable, renewable and green systems, infrastructure, practices and materials in our projects and services<br><br>Generate, lead and support new circular economy activities to support sustainability and economic outcomes<br><br>Work with partners including universities, and researchers to innovate and transform carbon reliance<br><br>Advocate for an increase in sustainable practices and materials in all development, offset by tree and renewal energy integration<br><br>Make public electric vehicle charging infrastructure available for all users, including micro-mobility, catalysing the uptake of electric vehicles in Adelaide and improving Council and community performance on transport emissions | Develop a target to increase green infrastructure in our assets to support and enhance our environment<br><br>Increase the number of electric vehicle charging stations from 54 in line with Council's Climate Strategy<br><br>Review Procurement Policies and Guidelines by 2024 to include requirements that support Circular Economy outcomes<br><br>Support a 50% reduction in the city's community greenhouse gas emissions by 2030 from the 2020 baseline with an ambition to be net zero by 2035 |

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **A sustainable city where climate resilience is embedded in all that we do** | Work with our partners to plan for, lead and educate our community on a climate resilient future<br><br>Support the adaptation of buildings and industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and processes<br><br>Work with partners to access data to track the number of green upgrades or new buildings<br><br>Provide progressive waste management and resource recovery services<br><br>Partner with the community to divert more waste from landfill | Develop a Sustainability Governance and Reporting Framework by 2025 and capture and share data and learnings<br><br>All asset investment (design, construct and maintenance) considers and embeds appropriate climate resilient measures<br><br>Support the community to reduce their climate impact through the new City of Adelaide Climate Strategy<br><br>50 dwellings are delivered annually through adaptive reuse of underutilised buildings<br><br>All new dwellings built from 2025 are fully electric (no internal gas supply)<br><br>Establish a baseline to measure circularity in the City of Adelaide and initiate targets to increase circular economy outcomes<br><br>Increase diversion from landfill for residential kerbside waste from 50% (2020) to 80% by 2030 |
| **The status, attributes and character of our green spaces and the Park Lands are protected and strengthened** | Continue the support for the Kadaltilla/ Adelaide Parklands Authority Subsidiary and the delivery of the Kadaltilla Charter and Business Plans<br><br>Lead and advocate for the environmental value, productivity, quality and biodiversity of the Park Lands, squares, open space and streetscapes<br><br>Protect and restore native habitat in our city<br><br>Work with partners to create innovative ways to create or convert underutilised areas to green space<br><br>Advocate for no new development in the Park Lands and returning Park Lands that have been alienated | Achieve a net increase in biodiversity, habitats, and ecosystems health within the City of Adelaide by 2030<br><br>Support a net increase in street trees annually aligned to heat island data within Council's Climate Strategy<br><br>Support 40% tree canopy cover by 2035<br><br>Develop a target to increase green spaces to support our environment<br><br>Achieve world heritage listing of our Park Lands, and protect their national heritage listing status and pursue State Heritage listing to strengthen protections<br><br>No loss of Park Lands and seek to reclaim Park Lands green space in line with the Kadaltilla Strategic Plan<br><br>Deliver the Adelaide Park Lands Management Strategy |

# Our Economy

## Growing, innovative and responsive

Our Objective is to:

- Continue to grow our economy in alignment with the community
- Support existing businesses to be agile and responsive to change
- Create strong skilled workforces

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Adelaide's unique experiences and opportunities attract visitors to our city** | Continue the support for the Adelaide Central Market Authority (ACMA) Subsidiary and the delivery of the ACMA Charter and Business Plans<br><br>Partner with the State Government, universities, associations, community and advocacy groups to activate and upgrade precincts to stimulate investment, visitation and maximise opportunities<br><br>Refresh the way in which information is provided to visitors to the city<br><br>Reinforce the position of Adelaide as the State's central business district and amplify Adelaide's reputation as a place to learn, work and start a business | Support the delivery of key actions of ACMA<br><br>Increase the number of people who visit the city from 2.1 million to 2.5 million by 2028 through local, interstate and international visitation.<br><br>Increase in foot traffic in key and emerging precincts annually in line with the Council's Economic Development Strategy<br><br>Increase spending across the city<br><br>Deliver marketing and promotion strategies to share Adelaide's unique attributes and emerging opportunities |

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Achieve a critical mass of jobs and investment and attract and retain businesses by growing a dynamic, holistic economy** | Continue the support for the Adelaide Economic Development Agency (AEDA) Subsidiary and the delivery of the AEDA Charter and Business Plans<br><br>Provide services and information that contribute towards a high productivity economy<br><br>Work with partners, universities and businesses to attract investment and improve employment opportunities<br><br>Create partnerships to grow and develop current and emerging sectors such as medical, technology, creative and professional services sectors<br><br>Create efficiencies and reduce barriers to support small, medium and large-scale businesses to open and thrive in our city | Council and AEDA to partner with key stakeholders to progress economic development and growth outcomes across all sectors in the City to increase city contribution to Gross State Product<br><br>Develop a City of Adelaide Economic Development Strategy by 2024 to drive growth<br><br>Support the delivery of the key actions of the AEDA Strategic Plan to support investors, emerging sectors, entrepreneurs and business owners to be successful, innovative and responsive to a changing business environment<br><br>Deliver economic data and insights to our business community.<br><br>An increase of businesses who think the city is a good place to do business from 64% to 75%<br><br>An increase in the number of new businesses and investment in the city<br><br>Increase the use of social enterprises and Aboriginal Torres Strait Islander owned businesses through City of Adelaide procurement |
| **Council is driving development opportunities for our community via diverse commercial activities** | Work with partners on the completion of major development outcomes that focus on economic and housing outcomes such as 88 O'Connell Street, Market Square and the former Bus Station<br><br>Maintain the Future Fund to support investment in revenue generating activities to reduce ratepayer burden | Review the Strategic Property Action Plan by 2024 to manage opportunities including car parks and other commercial assets for our community<br><br>Develop sales and tenancy targets associated with City of Adelaide housing developments<br><br>Manage the governance arrangements for the Future Fund |

# Our Places

## Interesting, purposeful and safe

Our Objective is to:

- Manage assets to meet the needs of our community
- Encourage bold, interesting and purposeful development
- Facilitate and activate our places in a safe and accessible way for our community

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Community assets are adaptable and responsibly maintained** | Deliver quality street and laneway upgrades, mainstreets, precincts, and neighbourhood revitalisation and improvements that make Adelaide well-designed, safe and unique<br><br>Create new assets to meet emerging community needs with a focus on safe design, construction and maintenance<br><br>Support the maintenance and development of bold and interesting community, cultural and civic places and infrastructure in step with residential growth, enabling connections into and out of the city<br><br>Work with partners to increase active and diverse transport measures to ensure drivers, cyclists and pedestrians can safely and easily move within the city with a goal to minimise road incidents and decrease fatalities<br><br>Work with partners to support safer road user behaviour | Commence the design of the Hindley Street upgrade project by 2023/2024<br><br>Commence the design of the Gouger Street upgrade project by 2023/2024<br><br>Commence the design of the O'Connell Street upgrade project by 2024/2025<br><br>Commence the design of the Hutt Street upgrade project by 2024/2025<br><br>Commence the design of the Melbourne Street upgrade project by 2025/2026<br><br>Develop and implement an Integrated Transport Strategy and establish associated targets by 2024 that aligns to the South Australian Road Safety Strategy to 2031<br><br>Revise the Asset Management Plans by June 2024 |

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Encourage bold, interesting and purposeful development that supports the changing needs of our community and city** | Lead the development of a City Plan that provides guidance on city growth, development, amenity needs and accessibility to make Adelaide a liveable and walkable city that people are proud to call home<br><br>Create and advocate for multi-use green spaces such as open space, community gardens and pocket parks that enable shared use and community connection<br><br>Encourage repurposing, adaptive reuse and improvement of buildings and facilities<br><br>Support the development or conversion of diverse and affordable office spaces and housing<br><br>Protect, share and elevate our heritage and culturally significant places, maintaining the character while encouraging adaptive reuse, repurposing and upgrading buildings | Develop the City Plan by 2024<br><br>Increase in the number of people who agree that the city is a welcoming and dynamic place full of rich and diverse experiences from 82% to 90%<br><br>Increase in the number of dwellings in our city from 14,660 (2021) to 17,780 by 2026 and 22,770 by 2031<br><br>15% of new dwellings are available as affordable purchase or rental to low and moderate income earners<br><br>No loss of local heritage places and consider options to increase the 1,850 places<br><br>Review the heritage overlays to ensure our heritage places are known and accommodated during development by 2025<br><br>Deliver conservation management plans for heritage assets by 2025 |
| **Create safe, inclusive and healthy places for our community** | Maintain and improve disability, LGBTQIA+ and vulnerable or minority group access and inclusion.<br><br>Create opportunities for sustained activation in the city through outdoor dining, parking, leases and licences<br><br>Encourage interesting and unique experiences in public spaces through permit management<br><br>Support businesses to operate safely<br><br>Provide services that encourage responsible pet ownership | Achieve Disability Access compliance in all new and upgraded infrastructure<br><br>Review the Disability Access and Inclusion Plan by 2024<br><br>Review the Wellbeing (Public Health) Plan by 2026<br><br>Review the Dog and Cat Management Plan by 2024<br><br>Review and implement by-laws which respond to community needs by 2025 |

# Our Corporation

## High performing, customer-centric and bold

Our Objective is to:

- Effective Leadership and Governance
- Exceptional Customer Experience
- Financial Sustainability
- People Engagement
- Strategy, Value and Efficiency
- Technology and Information

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Effective Leadership and Governance** | Demonstrate bold capital city leadership and robust governance with our community at the heart of our decisions<br><br>Enable effective governance, risk management, accountability and transparency at all times in decision making | Implement a Public Transparency Policy by June 2024<br><br>Reduce the number of items and Council decisions considered and held in confidence<br><br>Deliver a robust internal audit program that aligns to service outcomes<br><br>Review and monitor the Governance Structure to ensure best practice decision making and enable effective advice for Council's undertakings<br><br>Review Emergency Management Plans and response by 2025 |
| **Exceptional Customer Experience** | Listen and respond to our community, embedding their perspective to support decision-making<br><br>Focus on the experience of our customers to ensure outcomes meet expectations<br><br>Promote and communicate the work of Council | Achieve and maintain Voice of the Customer Survey scores for Customer Satisfaction and Customer Ease<br><br>Review marketing and communication policies and practices to ensure website and social media content is reflective of current decisions, projects and services |

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Financial Sustainability** | Focus on budget repair and ensure responsible financial management through the principle of intergenerational equity while delivering quality services<br><br>Achieve high value procurement and contracts management outcomes<br><br>Improve service efficiency by identifying new revenue streams and creating new opportunities for income | Review the Rating System to ensure optimum outcomes by 2024<br><br>Determine future funding requirements for community assets such as Torrens Weir enhancement and replacement/strengthening of Adelaide Bridge<br><br>100% of procurement is conducted in line with relevant Council policies and supports Council's Climate, Diversity, Reconciliation, Workforce and 'Buy Local' strategies and targets<br><br>Review the Procurement Policy and Guidelines to support circular economy, climate resilience, Aboriginal and Torres Strait Islander employment and local sourcing by 2024<br><br>Financial indicators are in line with annual targets (as outlined in the Long-Term Financial Plan) with a focus on Asset Renewal Funding Ratio between 90% and 110%<br><br>Grow the share of non-rates based revenue |
| **People Engagement** | Attract and retain people with skills and behaviours which align with our organisational objectives and values<br><br>Create an organisational culture that enables bold and experienced leadership, where our people thrive and are proud to work, making the City of Adelaide an employer of choice<br><br>Identify and develop the skills, capabilities, and leadership needed to support a high performing organisation<br><br>Support ways of working, which enable informed decision-making and enable agility, collaboration, and innovation | Aboriginal and Torres Strait Islander Employment at the City of Adelaide to be greater than 2%<br><br>Deliver and maintain a Workforce Strategy by 2024<br><br>Deliver a City of Adelaide Graduate Program by 2025<br><br>Action recommendations arising from employee feedback tools and risk assessment to generate positive employee outcomes |

| Outcome | Key Actions | Indicator of Success/Measures/Targets |
|---|---|---|
| **Strategy, Value and Efficiency** | Work with local, national and international partners to deliver the outcomes of the Strategic Management Framework to move our city into the future<br><br>Create, maintain and integrate plans and policies that reflect and guide decision making and support our city and our community to thrive<br><br>Use community feedback, data and research to monitor, maintain and adapt our range of quality services to continuously improve the value and efficiency | Develop and implement a Strategic Partnerships Framework to achieve best practice outcomes including benchmarking opportunities by 2024<br><br>Complete a review of the Strategic Planning Framework by 2024<br><br>Strategic and Capital Projects are delivered on time and on budget (target 75%)<br><br>Business, Resident and City User Surveys identify overall satisfaction with Council services<br><br>Review the Community Engagement approach by 2025<br><br>Develop baseline data for relevant measures in the Strategic Plan by 2024 |
| **Technology and Information** | Focus on integration, digital opportunities and innovative solutions to support business efficiency and customer focused performance improvements<br><br>Continue to efficiently maintain the rich historical significance of our archival and civic collection | Deliver and maintain Business Systems Roadmap to support business efficiency<br><br>Deliver Workforce Management System upgrades<br><br>Implement data integration solutions for Customer Insights to drive efficiency outcomes<br><br>Increase awareness and engagement of staff through the use of better systems<br><br>Improve and drive efficiency outcomes through the integration of customer data and insights |

# Strategic Planning Framework

**This Plan forms part of the City of Adelaide's suite of Strategic Management Plans.**

| | |
|---|---|
| **Strategic Plan**<br>Community | Long Term with a four year delivery focus.<br>Planning for the vision and aspirations of the Adelaide Capital City. |
| **Long Term Financial Plan**<br>Financial | Ten year Plan, revised annually to ensure a ten year view is maintained.<br>Planning for the long term financial sustainability of the City of Adelaide. |
| **Asset Management Plans**<br>Infrastructure | Suite of ten year Plans.<br>Planning for the sustainable renewal and maintenance of Council assets |
| **City Plan**<br>Development/ Built Form | Ten year Spatial Plan.<br>Planning for the future land uses and built form of the Adelaide Capital City. |

Structure of the Strategic Plan 2024–2028 and supporting documents:

## Long Term Considerations

**Vision**
A vision for the future of Adelaide. A leading aspirational statement summarising the focus of the plan and guiding decision-making on the future of the city.

**Aspirations**
That help articulate the vision, expressed as outcomes which help shape future policy positions of Council.

## Short Term Considerations

**Principles**
Inform primary areas of focus to drive outcomes across the four-year plan.

**Objectives and Outcomes**
Describe what will be achieved and the strategies employed.

**Key Actions**
What is being delivered under each objective relevant to Council's responsibilities (How we will do it)

**Indicators of Success/Measures/Targets**
Provide an understanding of what long term success looks like (Measures of Success)

## Resource Plan

The Strategic Plan is supported by a Resource Plan – the financial, and non-financial resources required for the Administration to enable and support the Strategic Plan's four year delivery over 2024–2028.

## List of related Strategies, Plans and Policies

To bring our Strategic Plan to life, Council has a suite of related Strategies, Plans and Policies. These will be changed and refined over time to reflect the key outcomes, actions and measures of success outlined in this Strategic Plan. The list below highlights the primary relationship of each related strategy, plan or policy, noting that some of these have multiple relationships to the aspirations. For a complete list of strategies, plans and policies, please visit the City of Adelaide website **cityofadelaide.com.au/about-council/plans-reporting/strategies-plans-policies**

### Our Community

- Active City Strategy
- Adelaide Events Guidelines
- Adelaide Parklands Leasing and Licencing Policy
- Adelaide Parklands Management Strategy (statutory)
- Cultural Strategy
- Dog and Cat Management Plan (statutory)
- Smart Move Transport and Movement Strategy
- Stretch Reconciliation Action Plan
- Wellbeing Plan (statutory)

### Our Environment

- Kadaltilla/Adelaide Park Lands Authority Subsidiary Charter
- Integrated Biodiversity Management Plan
- Resilient East Regional Climate Change Action Plan
- Water Sensitive City Action Plan

### Our Economy

- Adelaide Economic Development Agency Subsidiary Charter
- Carbon Neutral Strategy
- Waste Resource Recovery Strategy
- Property Strategy

### Our Places

- Adelaide Central Market Authority Subsidiary Charter
- Heritage Strategy and Action Plan
- Disability Access and Inclusion Plan (statutory)
- Homelessness, Social Housing and Affordable Housing Policy

### Our Corporation

- By-Laws
- Community Land Management Plans (statutory)
- Annual Business Plan and Budget (statutory)
- Procurement Policy
- Consultation Policy

# Resource Plan 2024–2028

Council has developed a Resource Plan which underpins this Plan. It outlines the financial and non-financial resources required to achieve our strategic objectives over the next four years. The Strategic Plan and the Resource Plan will work in concert with the Long-Term Financial Plan, Asset Management Plans and City Plan to inform the Annual Business Plan and Budget. Council's decision making is informed by strategies, plans and policies that articulate the provision of services, programs and projects. Program Plans ensure all work is planned and delivered in a coordinated way.

The role of a Capital City Council is diverse and complex, which impacts the way we deliver services. We are a leader, a service provider, a regulator, an owner, a facilitator and an advocate. By measuring the delivery of our objectives and key actions, our community will know what we have achieved. Targets provide further direction to ensure we are delivering on our vision for the future, while allowing Council to measure and track progress through quarterly reports and an Annual Report each year.



## Financial

**Financial Principles**

To deliver on our priorities and ensure financial sustainability for current and future generations, the below Financial Principles have been applied:

Council will:

- Continue to deliver current services and assets, indexed in line with Consumer Price Index (CPI)
- Apply fees and charges that are equitable and responsive to changing community needs
- Ensure an effective rating system
- Maintain an operating surplus
- Capitalise on external funding opportunities through retiming projects to align to stakeholder objectives, recognising the potential need for increased borrowings in order to respond to opportunities
- Consider new and different revenue streams to reduce reliance on existing revenue sources
- Adjust rate revenue after consideration of all other budget components and use growth in rate revenue to partly fund servicing new rateable properties and to service new borrowings
- Fund new or enhanced services, assets or maintenance requiring an increase in operating costs from the adjustment of priorities, rate revenue or other revenue increases and/or through savings
- Base all capital renewal expenditure on our asset management plans
- Consider the disposal, purchase and/or repurposing of property assets to support community outcomes, without incurring a financial loss
- Use borrowings to fund new and upgrade projects where appropriate (which include major projects)
- Ideally, fund operations, expenses or renewal projects from within the budget.

When considering these principles, Council considers the service or project in the context of Council's:

- Roles and responsibilities;
- Statutory obligations;
- Ability to give effect to an adopted strategy, policy or plan;
- Levers and discretion to intervene to address market challenges, opportunities or failure; or
- Ability to gain value, efficiency or effectiveness in relation to dollars spent.

Council's Financial Principles ensure that Council's measures and targets can be met over the longer term.

**Financial Sustainability**

The Council's financial resources have the capacity to absorb cyclical economic factors, social trends and financial shocks. Funding decisions are an important method of providing the capacity to meet financial sustainability in the medium and long term, along with planning, stability of revenue and costs, proportionality of revenues with benefits over time and a 'balanced' operating result.

Financial sustainability is also central to supporting intergenerational equity (or fairness), which ensures that the costs associated with expenditure are spread over time relevant to the communities that will draw benefit. Council's Long Term Financial Plan has assumed that existing service levels will be maintained, while seeking efficiency improvements in line with appropriate planning, measures and benchmarks.

**Long Term Financial Plan**

A high level 10-year Long Term Financial Plan has been developed as part of Council's ongoing financial planning to assist Council to plan within a longer term strategic framework. The key components of the plan are:

- Assessment of Council's current financial position and achieving longer term financial sustainability.
- Ensuring Financial Principles are met.
- Consideration of Council's appropriate role and responsibilities.
- Ensuring alignment with the Strategic Plan and maintenance of high priority expenditure programs.
- Ensuring alignment with agreed service provision and delivery standards.
- Ensuring alignment with Revenue and Financing guidelines, including Rating and Treasury Policies.
- Ensuring alignment with Asset Management Plans.
- Ensuring alignment with other plans and strategies.
- Costing proposed strategies before they are agreed.
- The specific assumptions and outcomes underpinning the Long Term Financial Plan are:
- Rates Revenue in line with forecast inflation (in addition to growth from new developments).
- Fees and charges in line with forecast inflation.
- Salaries and wages forecasts based on enterprise agreements; once expired, Wage Price Index (WPI) applied.
- Other revenue and expenditure growth, in general, in line with forecast inflation.
- Interest rates relative to market expectations.
- Capital renewal expenditure in line with Asset Management Plans (AMPs).
- Capital enhancements (new and upgrade) in line with Council Decision to fund $15 million per annum over current term of council and assumed continuation.

The Long Term Financial Plan will be periodically adjusted to reflect the recent decisions of Council to ensure sustainability is maintained.

**Four Year (Long Term) Financial Plan**

Council's four year financial view, taken from the Long Term Financial Plan, provides the funding for Council's Strategic Plan. This period sees significant investment in Council priorities including upgrades to several streets, partnerships with the State Government on major projects such as the former Adelaide Aquatic Centre site, Strategic Property developments including the Franklin Street Bus Station redevelopment, Market Square and 88 O'Connell Street and ongoing delivery of core services. Significant renewal projects including Torrens Weir and King William Street Bridge influence future year.

| Indicators | 2023–24 | 2024–25 | 2025–26 | 2026–27 | 2027–28 |
|---|---|---|---|---|---|
| Operating Surplus Ratio – Target: 0%–20% | 0.9% | 1% | 0.9% | 2.8% | 2.6% |
| Net Financial Liabilities – Target: Less than 80% | (1%) | 15% | 39% | 38% | 39% |
| Asset Renewal Funding Ratio – Target: 90%-110% | 90% | 93% | 95% | 98% | 100% |
| Asset Test Ratio – Target: Maximum 50% | 10% | 13% | 18% | 18% | 19% |
| Interest Expense Ratio – Target: Maximum 10% | 0.4% | 1.3% | 1.7% | 2.0% | 2.3% |
| Leverage Test Ratio – Target: Maximum 1.5 years | 0.2 | 0.3 | 0.5 | 0.5 | 0.5 |
| Cash Flow from Operations Ratio – Target: < than 100% | 101% | 100% | 102% | 107% | 107% |
| Borrowings | 20% | 26% | 36% | 36% | 37% |

# General Operating

**Operating Position**

| $'000s | 2023–24 | 2024–25 | 2025–26 | 2026–27 | 2027–28 |
|---|---|---|---|---|---|
| **Income** | | | | | |
| Rates Revenues | 135,395 | 139,809 | 145,177 | 151,533 | 156,845 |
| Statutory Charges | 14,683 | 14,990 | 15,356 | 15,739 | 16,132 |
| User Charges | 70,002 | 64,926 | 66,509 | 74,101 | 75,951 |
| Grants, Subsidies and Contributions | 4,449 | 4,547 | 4,318 | 4,426 | 4,536 |
| Investment Income | 150 | 154 | 157 | 161 | 165 |
| Reimbursements | 338 | 346 | 355 | 364 | 373 |
| Other Income | 465 | 477 | 488 | 500 | 513 |
| Total Income | 225,481 | 225,249 | 232,361 | 246,825 | 254,516 |
| **Expenses** | | | | | |
| Employee Costs | 85,013 | 83,050 | 85,581 | 88,215 | 90,929 |
| Materials, Contracts & Other Expenses | 81,672 | 80,569 | 82,199 | 86,191 | 88,343 |
| Depreciation, Amortisation & Impairment | 56,040 | 56,835 | 59,353 | 62,012 | 64,675 |
| Finance Costs | 835 | 2,525 | 3,117 | 3,502 | 3,970 |
| Total Expenses | 223,561 | 222,980 | 230,250 | 239,920 | 247,917 |
| **Operating Surplus** | **1,920** | **2,268** | **2,111** | **6,905** | **6,598** |

**Rate revenue**

Rates are an important source of revenue, accounting for approximately 60% of the total annual revenue. Council assumes a 3% growth in future rate income, primarily from valuation reviews and new properties.

**Other revenue**

The Council operates a number of fee based facilities including the Adelaide Aquatic Centre, Adelaide Golf Links, UPark, Adelaide Town Hall and the Property Portfolio (including Adelaide Central Market). Each fee based facility provides valued services for ratepayers and visitors and is an important source of revenue. Council generates income from statutory charges, set by State Government legislation, in addition to the charging of fees for Council services including on-street parking-machine tickets and hire income for Council properties.

**Treasury Policy**

| $'000s | 2023–24 | 2024–25 | 2025–26 | 2026–27 | 2027–28 |
|---|---|---|---|---|---|
| Projections | | | | | |
| New Borrowings | 20,285 | 17,515 | 20,921 | 5,005 | 3,626 |
| Principal Paid | - | - | - | - | - |
| Gross Borrowings | 70,568 | 87,666 | 108,587 | 113,592 | 117,219 |
| Future Fund | 40,384 | 39,967 | 39,967 | 39,967 | 39,967 |
| Net Borrowings | 30,184 | 47,699 | 68,620 | 73,625 | 77,252 |
| Prudential Borrowing Limit | 157,628 | 181,387 | 191,951 | 202,867 | 207,932 |

The Long Term Financial Plan identifies borrowing as an important funding source particularly for strategic expenditure relating to new and upgraded projects and strategic property activities. Borrowing is undertaken in accordance with Council's Treasury Policy which underpins decision making for the funding of Council's operations in the context of cash flow, budgeting, borrowings and investments.

# Infrastructure and Property

**Asset Management**

| $'000s | 2023–24 | 2024–25 | 2025–26 | 2026–27 | 2027–28 |
|---|---|---|---|---|---|
| Major Projects | 36,386 | 30,917 | 21,100 | 15,920 | 15,820 |
| New and Upgrades | 13,932 | 520 | 320 | 320 | 320 |
| Renewal | 50,416 | 48,682 | 51,932 | 52,739 | 54,922 |
| Total Capital | 100,734 | 80,119 | 73,352 | 68,979 | 71,062 |

The Council owns, and is responsible for the management, operation and maintenance of a diverse asset portfolio that provides services and facilities for city users. Asset Management Plans have been developed to provide effective and comprehensive management of Council's asset portfolio, with a three year view to deliver the required levels of service for the community and meet strategic and legislative requirements. Rolling condition audits provide information on the ongoing improvement of assets to ensure they inform the Annual Business Plan and Budget.

Renewal and replacement capital expenditure is based on Asset Management Plans which consider the optimal timeframe for asset replacement based on whole of life costing. Total capital expenditure shall be managed in a way which avoids disruptive adjustments to activities, programs and revenue raising efforts.

**Property and New and Upgraded Assets**

Council's property portfolio seeks to address strategic objectives for growth in the city and provides additional net revenue to Council, assisting to manage expenditure commitments. Consequently, it is important that both the value of the portfolio, and its returns (both net of borrowings), are protected to avoid adverse impacts with regard to intergenerational equity, rates and expenditure programs in the future.

The Property Strategy aims to optimise the performance of the property portfolio. It promotes a partnership approach to acquire or repurpose property assets with the private sector and other tiers of government to leverage their value, to meet strategic objectives or to sell under-performing assets with sale proceeds reinvested into new income generating opportunities.

# Resources

### Service Delivery Influences

Influences which may impact on the scope and level of services to be provided over the next four years include:

- Local Government Price Index increases on relevant goods and services, which has historically tracked at approximately 1% above the CPI.
- Current Enterprise Agreements for most staff provide for wages and salary increases of 3% and 4% from 2024.
- Increase in utility charges with indications that sustainability premiums will continue into the future.
- A stronger focus on renewals and maintenance of assets, specifically to mainstreets.
- Service and infrastructure needs for a growing and changing population in the city.
- Commitments to major projects and partnership initiatives.
- Council revenue from commercial operations and other fees and charges expected to be impacted due to fewer people working in the city post-COVID-19.
- Impact of increasing interest rates on Council's borrowings.

### Information Technology

Council recognises the strategic importance of technology investment to deliver integrated technology solutions that improve access to information, streamline processes, safeguard information and systems and encourage collaboration across the organisation, to enable the delivery of customer focused services to our community. The Business Systems Roadmap sets out the program of works over the next four years in Council's ongoing journey to be a digitally enabled, integrated, innovative, secure and inclusive Council.

Council has an ongoing program of works that focusses on four key areas:

- Customers at the centre: We understand our customers and provide services to meet their diverse needs.
- Secure and reliable: We train our staff and use technology to increase safety and security for our customers and their information.
- Data Driven: We use data and insights to improve our engagement and experiences with our customers and communities to make better and faster decisions.
- Seamless: Our services are simple, intuitive, with purpose and seamless for a better experience for our customers and communities.

### Our People

| FTE | 2023–24 | 2024–25 | 2025–26 | 2026–27 | 2027–28 |
|---|---|---|---|---|---|
| Our Community | 95.7 | 69.4 | 69.4 | 69.4 | 69.4 |
| Our Environment | 40.2 | 39.2 | 39.2 | 39.2 | 39.2 |
| Our Economy | 157 | 157 | 157 | 157 | 157 |
| Our Places | 321.3 | 321.3 | 321.3 | 321.3 | 321.3 |
| Our Corporation | 160.6 | 174.4 | 170.4 | 170.4 | 170.4 |
| **TOTAL** | **774.8** | **761.3** | **757.3** | **757.3** | **757.3** |

Appropriate resourcing capacity and capability is critical to deliver on the Strategic Plan responsibilities and be responsive to new and emerging challenges. Workforce planning enables the Corporation to attract, develop and retain the skills, knowledge and experience required to deliver across the duration of the Strategic Plan, and creating a performance culture in which individuals are aligned to delivering organisational priorities.

The Corporation, in the way it supports customers, conducts business, delivers services, develops its people and supports good governance must reflect the Council's vision and enable its achievement. The Corporation's commitment to be genuinely responsive to the changing needs of people, business and communities is paramount to the delivery of the Strategic Plan, requiring effective delivery now, and clear plans for the future.

A focus on efficiencies and continuous improvement will enable FTE numbers to be maintained at current levels over the four-year period. At times, consultancy services or additional contract or temporary staff will be required to ensure our service delivery and people resources are scalable.

### Employee Values and Behaviours

At City of Adelaide our values provide the context for how we work together and with others. They are the standard against which we hold ourselves and others accountable. We are committed to building a high performing, inclusive and sustainable workplace for the future that is based on and fosters these values and recognises alignment to them is integral to our culture.

- Achievement
- Collaboration
- Customer Commitment
- Integrity
- Innovation

### Our Corporation's Purpose

As an organisation we will be:

- An exceptional service provider
- A reliable and trusted partner
- A professional administrator
- A high achieving, best practice organisation

CITY OF ADELAIDE

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SA123-004

17 November 2023

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To whom it may concern

**SUBMISSION TO SOUTH AUSTRALIA'S 20-YEAR STATE INFRASTRUCTURE STRATEGY**

The City of Marion is pleased to submit a response to South Australia's 20-Year State Infrastructure Strategy discussion paper. The City of Marion is supportive of Infrastructure SA's endeavour to develop a new strategy to prioritise the State's infrastructure investment over the next 20 years.
The City of Marion provides feedback for the following key areas:

## Economic Development

The Tonsley Innovation District is recognised as a leading global innovation hub. The State Government should continue to attract innovative international tenants.

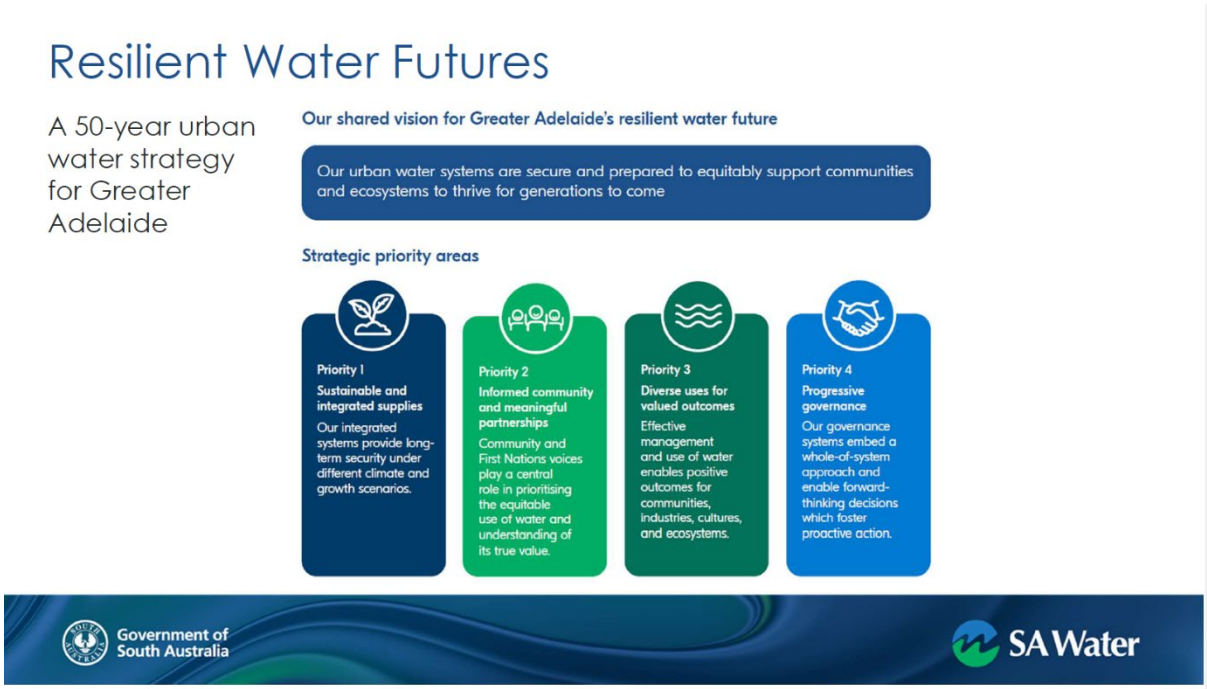
ABS Statistics saw an increase in car ownership from 2016 to 2021, creating pressure on traffic and parking management. Traffic congestion continues to increase in Adelaide as a result of increased car ownership. The State Government should consider investing in other freight options such as rail, bulk distribution centres (then using smaller vehicles for last mile deliveries) and encouraging off peak freight movements to help reduce traffic congestion.

## Water Management

The City of Marion has developed a Water Business that recycles stormwater from the Sturt River, the water is then cleansed through a series of wetlands before being injected into the aquifer. The treated stormwater is then extracted to irrigate over 35 reserves and supply water to 3rd parties. Council has plans to expand our water business and reduce the reliance on potable water. Through the provision of co-funding, the State should consider how it can support Councils deliver water recycling initiatives that reduce the reliance on potable water.

There is potential for the interconnection of schemes such as Oaklands Wetland with other water reuse schemes, to move water around Adelaide to meet areas of high demand. SA Water are leading on this with the Resilient Water Futures Project, with Marion Water being one of many project partners.

It is recommended that Infrastructure SA contact SA Water to find out more about the Resilient Water Futures plan.




## Infrastructure needs for Population Growth

The State Government should carefully consider the location of schools, community centres, libraries, and sporting complexes across metropolitan Adelaide to ensure these facilities are strategically located to meet the needs of current and projected population growth. This could be achieved through the development of a decision tool that informs future community infrastructure priorities and needs.

For example, State Government could helpfully determine a standard population catchment and geographical reach for each category of social, educational, and recreational infrastructure. Some other States do this using age demographics and availability of public transport. This would help Councils and State Government allocate infrastructure funding appropriately. The gaps in provision would be made clear; and it would be easier for State Government to reject funding bids for projects in areas which, according to predetermined criteria, have "sufficient" allocation of that type of structure.

Government should ensure that infrastructure is appropriately considered and funded prior to or in combination with announcements for new greenfield development sites. This will ensure infrastructure can be appropriately incorporated in early design phases.

In the Marion context, utilities should provide relevant capacity information to both Council and Government so we can be assured that the projected growth in population and housing can be accommodated.

Improved coordination between State Government agencies will provide improved triple bottom line outcomes. The City of Marion often sees State Government Departmental objectives at odds with each other, for example increase in tree canopy cover is at odds with Major Infrastructure projects and the PDI Act.

## Fit-for-purpose affordable housing

State Government should take the lead in procuring sites for strategic infill including purchasing and amalgamating key sites, to provide affordable housing and improve housing diversity at key locations.

The City of Marion would like to see development rezoning on arterial roads, particularly in close proximity to train and tram stops to increase high density development at these locations and reduce infill development in our local streets.

## Public Transport and Mobility

Large sections of our Council area are experiencing significant growth in traffic through the combination of increasing urban consolidation through in-fill developments, large scale developments such as the Tonsley Innovation Precinct, and other major transport destinations such as the Marion Regional Centre and Edwardstown Industrial Precinct. The road network is witnessing an increase of competing demands such as the movement of people and goods, alternative modes of transport, access to properties, and demand for on-street parking. With the high demand for vehicular traffic increasing pressure to develop active travel options are presenting complex challenges.

The efficient movement of people and goods is critical to the function of our state. The City of Marion is focussed on the development of integrated transport infrastructure to facilitate the movement of people and goods to key destinations including connection to public transport, schools, and community facilities with a key focus to design for walking and cycling infrastructure.

The City of Marion encourages the State Government to continue to partner with the City of Marion to collaboratively solve transport problems and identify opportunities to provide an efficient, safe and future focussed transport network.

The State Government could consider the location of public transport infrastructure to ensure it is fit for purpose and is highly utilised by developing service levels based on utilisation that meet community demand and expectations. A ‘ride together, thrive together; embrace public transport for a better future’ education campaign could be developed to encourage the uptake of public transport.

The cost of public transport maybe inhibiting usage. The State Government could consider making public transport free (or more heavily subsidised).

The major challenge to the provision of public transport services across Adelaide is the sprawl of low-density housing that limits the accessibility of rail and bus services. Increasing the density (and height) of housing in targeted and confined precincts, including a mix of inner and outer suburbs, will allow for public transport to be provided on a more targeted and economic basis, provide opportunities to link public transport with high-quality active transport corridors. These investments will, in turn, reduce dependence on cars and improve public health through greater exercise and exposure to green spaces.

## Public Health

Given the forecasts for the ageing population, Governments should continue to proactively encourage healthy lifestyles and incentives to improve fitness to help reduce mortality rates and support healthy lifestyles. From a local government perspective, Council provides an important role in liveable communities including the provision of services, facilities, and infrastructure to support healthy lifestyles. The State Government should continue to work in partnership with local government to support wellbeing, community connection and healthy lifestyle initiatives.

## Cultural Heritage and Inclusivity

All levels of Government need to consult First Nations people and Culturally and Linguistically Diverse South Australians to better understand the services and infrastructure needed by their communities. This should include community capacity building; there is a risk that the State Government develops infrastructure with no resources to run programs for education or community capacity building. Infrastructure should be considered holistically with social, economic, and cultural factors.

Governments should aim to build trust by respecting cultural heritage and fostering genuine collaboration with First Nations communities and CALD communities.

## Transition to net zero carbon emissions

The City of Marion is encouraged to see climate change listed as a mega trend; this could be broadened to include "climate resilience and sustainable development" i.e., the trend includes the problem and the solution, including focus on all the UN Sustainable Development Goals.

Through the City of Marion Carbon Neutral Plan, we are investigating how we can account for **embodied carbon** in our infrastructure projects. In particular, we would be interested in reducing our carbon exposure in products containing bitumen, concrete and steel. It would be good for the final Infrastructure Strategy to offer guidance on this aspect of sustainability.

The Infrastructure Strategy should be clear in describing **carbon offsetting and carbon capture** as a last resort. We recommend that the following hierarchy be included to direct priorities around carbon management:

1. Avoid carbon generation.
2. Reduce / minimise carbon.
3. Offset carbon.
4. Carbon capture and storage technology.

We see decarbonising infrastructure as a critical risk in transitioning to carbon neutrality. The State Government should work with peak industry bodies to assist with clear calculation and reporting on embodied carbon. Embodied carbon calculations through supply chains are currently complex and difficult to account.

We support the idea of **domestic PV expansion**. Local Government has a role in helping with education and awareness around household renewables. We also have an emerging role through localised **virtual power plants** that aim to support managing distributed energy networks. This is a new area for Local Government. Sharing of experiences, clear governance and procurement procedures will be important to ensure all due diligence is met and fully understood by our sector.

## Circular Economy

Councils manage the delivery of extensive municipal waste management and recycling services that aim to support development of our circular economy. Current priorities areas for the City of Marion waste services include:

- Diversion of organic matter (particularly food waste) from general landfill stream to dedicated organics collection streams (known as **FOGO – food organics green organics**). City of Marion is currently investigating the feasibility of delivering a weekly organics waste collection. A State Government requirement for Councils to offer weekly landfill (red bin) collection is currently an obstacle in this regard. Infrastructure and services for local organics processing is already well established and easily expanded. In addition, the local demand for processed composts and mulches is high and can support further establishment of green infrastructure. The diversion of organic matter from general waste streams also reduces costs to councils and reduces carbon emissions in landfill.
- Development of soft plastic reprocessing industries and technologies is currently a challenging space. There should be support for the establishment of more local soft plastics reprocessing industries to deal with the high supply of this material. There are opportunities for the State Government to support research and development and match local industry development with local infrastructure needs. This will assist in building confidence for investment in new technologies. City of Marion has trialled the use of products like Reconophalt™ and we frequently purchase recycled plastic outdoor furniture, bollards, decking etc.

Sustainability, climate change and circular economy are priority areas for council's economic development unit. Council staff work with local businesses to demystify the opportunities provided by environmentally friendly, efficient, and cost-effective technology. There are a wide range of under-utilised support programs such as REPS (a South Australian Government energy productivity scheme that provides cash incentives to South Australian businesses to save energy), Building Upgrade Finance, and other grant programs which will fund sustainability efforts. These programs, when used, have a history of delivering capital upgrades, improving businesses' bottom-line, and reducing their environmental impact, but are very challenging for small businesses to navigate on their own.

## Climate adaptation

To ensure community and investor confidence, climate risks must be identified, disclosed, and managed throughout all public infrastructure projects. This will be required through all levels of government. The State Government should lead this process and assist in developing clear and easily understood reporting frameworks so that the community,

investors, and insurers are aware of climate risk exposure and how projects will be managed.

- An essential underlying component of this will be consistent and reliable climate hazard mapping that is recognised and trusted by all major stakeholders. Duplication of hazard mapping and varied spatial resolutions of mapping will lead to uncertainty and increased risk exposure. With the current absence of a state-wide climate hazard mapping we are creating our own localised maps as part of our Resilient South regional climate partnership and the Resilient Asset Management Project and through the SA Climate Ready Coasts project. Insurance industries are doing the same. Priority areas include:

    - Flood mapping
    - Bushfire risk
    - Urban heat indices (extreme heat, heat fatigue – related to greening, tree canopy, infrastructure, socio-economic factors etc)
    - Coastal risks (inundation, erosion, cliff stability, acid sulphate soils and changed coastal processes)

For the City of Marion, the biggest immediate threat is urban heat – particularly the impact of urban heat on health. We are very aware of urban development trends towards increase urban infill and reduced tree canopy cover that are increasing our community heat exposure risks. Council has made various submissions through reviews of the Planning and Design Code, the Greater Adelaide Regional Plan (GARP) and the Parliamentary Inquiry into the Urban Forest that highlight our concerns in this space. In particular:

- The rapid and ongoing loss of urban trees on private property
- The need for better tree protection laws including reversed onus of proof
- Conflicts between trees and powerlines (SA Power Networks)
- The need for increased diversity and planning for trees in future climate (supported through the Future Trees investigation – an initiative supported by Resilient South)

Coastal climate change risks are also taken very seriously by City of Marion. We run a regular coastal monitoring program to understand the stability of our rocky coastline and project the future impacts of coastal climate change. Coastal inundation and erosion will be a very real hazards for many areas of the metropolitan Adelaide coastline. There is a significant need for State Government assistance in planning for infrastructure such as sea walls to manage these risks in populated areas. The Climate Ready Coasts program is an important initiative to help with future coastal adaptation planning.

Further transitioning Adelaide towards a water sensitive city is also a major infrastructure priority. To support climate resilient flood mitigation, a much greater expansion of infrastructure incorporating water sensitive urban design (WSUD) is required along with expansion of recycled water networks. The Marion Water initiative of City of Marion is a good example of how we are supporting better expansion of recycled water networks. Further funding support from the State Government for major WSUD infrastructure expansion will also continue to be required as highlighted through Water Sensitive SA.

Resilience benefits of green and blue infrastructure play a crucial role in enhancing a community's ability to withstand and recover from various environmental challenges. These benefits should be considered in infrastructure planning to create more sustainable and resilient urban environments and include:

- Increasing permeable surfaces and enhanced stormwater management through the use of stormwater retention and detention and achieving water quality improvements through the use of Water Sensitive Urban Design.
- Regulating temperature and mitigating urban heat island effect and improving air quality
- Improve biodiversity and ecosystems by creating habitat.

We would encourage the State Government to consider regulating the inclusion of minimum and desirable blue and green infrastructure in both public and private land and building developments.

**Procurement**

The east coast State Governments adopt a contracting approach for many contracts that mandates or strongly encourages complete aggregation within public sector organisations, Queensland and Victoria are strong examples of this. This approach would see lower pricing overall and ease of use for both suppliers and public sector organisations.

Collaboration across councils and agencies should be further encouraged and promoted as efficient manner for the supply market to win new business. The supply market feedback has often touched on the administration effort of all councils undertaking individual market processes. This has been successful within our collaboration, with a recent collaborative market approach for major constructions resulting in positive feedback from the market and benefits for councils.

Standardisation of documentation and processes within all levels of government will improve procurement across industries. Currently many councils have individualised templates, processes and requirements, which often place further burden on the supply market. Implementing a homogenous approach to both State and Local Government will ensure efficiencies in process and overall better value for money due to reduced overheads from suppliers.

Innovation in processes, rather than Design and Construct and Lump Sum tenders, look towards Early Contractor Involvement (ECI) processes, or simplistic EOIs and shortlisted select RFTs. Reducing the costs of submissions and looking to 'open book' through ECI are starting to emerge as fair and equitable risk sharing approaches, for which the supply market looks favourably upon. This could be promoted more within the tiers of government, to become more standardised.

In summary, the City of Marion is eager to collaborate with the State Government to ensure that the 20-Year State Infrastructure Strategy reflects the diverse needs of our community, fosters sustainable development, and positions South Australia for a resilient and prosperous future.

Thank you for your consideration of City of Marion's feedback on the State Infrastructure Strategy. For any queries about this submission, please contact Mathew Allen, Manager Engineering, Assets and Environment on [redacted]

Yours Sincerely

[redacted]

Ben Keen
**General Manager City Services**
**City of Marion**

CITY OF Playford

# Submission to Infrastructure SA

# Response to South Australia's 20 -Year State Infrastructure Strategy

# Discussion Paper October 2023

# Response to South Australia's 20 -Year State Infrastructure Strategy Discussion Paper October 2023

The City of Playford welcomes the opportunity to respond to Infrastructure SA's *South Australia's 20-Year State Infrastructure Strategy Discussion Paper October 2023.*

The City of Playford is a key Local Government body in the outer metropolitan growth area of Northern Adelaide and is at the forefront of residential growth in South Australia. Currently representing over 105,000 residents, this is expected to grow to well over 150,000 by 2041 equating to seven people a day moving into our community.

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 vital to meet the demands of the rapidly growing community as well as growing populations further north in areas such as Gawler and the Adelaide Plains.

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 vast parcels of farmland rapidly transforming into housing estates. It is anticipated that in excess of 25,000 new homes will be built over the next 25 years. The recently released discussion paper on the *Greater Adelaide Regional Plan* identified additional potential significant growth in the City of Playford.

The growth of the City brings with it many opportunities, but also challenges. The need and expectation for the Council to deliver new and upgraded infrastructure is placing a high burden on rate payers. Whilst Council has a role to play in contributing towards infrastructure provision, it is inequitable for Playford ratepayers to be subsidising the accelerated growth to such a significant level, on behalf of Greater Adelaide.

It is poignant that we do not just create dormitory suburbs, but also focus on creating jobs close to home. Concerted efforts are 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 employment and 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, 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.

Infrastructure funding to support the growth areas of Playford were secured through negotiated infrastructure deeds. The infrastructure 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 contribute 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-funded infrastructure such as schools and medical services, and other social infrastructure such as aged care and childcare facilities.

Growth is also impacting broader regional infrastructure, with key transport routes under significant pressure due to increased traffic volumes associated with population growth. The funding to upgrade this infrastructure has not been secured in the growth areas and infrastructure deeds. Lessons need to be learnt to ensure that the issues above are not replicated in new communities.

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, including freight vehicles. Limited consideration has been made for public transport, which encourages car-dependent communities and does not align with global net zero objectives.

To meet the Federal Government's target of an additional 1.2 million homes and the State Government's support of this, a targeted coordinated approach to the provision of essential infrastructure to support these new communities is required. It is acknowledged that the City of Playford is integral in meeting the need for new housing. To achieve the government's housing targets regional infrastructure plans must be aligned with growth to provide transparency and assurance on the sequencing, timing and investment. This will only be achieved if coordinated infrastructure planning takes precedent and individual agencies, levels of government and the development industry do not work in isolation.

# Economic opportunities

The following are key economic opportunities that will significantly contribute to increase South Australia's economic growth. In line with the *South Australian Economic Statement's* vision for an economy that is fit for the future. These opportunities provide insight into new approaches to improve wellbeing, build local talent and economic resilience, and sustainable communities.

| Key economic opportunities | Comments |
|---|---|
| **Elizabeth CBD** | The City of Playford is investing significantly into transforming the Elizabeth CBD into a thriving mix of retail and commercial activity, the provision of services, activation, entertainment and experiences, cultural pursuits, and attractive and useable community public spaces. A revitalised CBD is essential to meet the demands and expectations of the city's rapidly growing community and respond to growth in areas beyond Playford, including Gawler, Light Regional and the Barossa Valley, with the Elizabeth CBD acting as a strategic CBD centre servicing the regional communities further north.<br><br>A designated regional centre Elizabeth CBD is serviced by rail and a bus interchange with a range of retail, education, medical and community facilities.<br><br>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.<br><br>This opportunity will be stimulus for new investment and will support the growing population in northern Adelaide with services and jobs close to home, ultimately improving living standards. It will see significant economic and social transformation for the City of Playford and norther Adelaide. |

| | |
|---|---|
| **Greater Edinburgh Parks (GEP)** | GEP is currently identified in the 30 Year Plan for Greater Adelaide supplying 95% of future Employment Lands in Greater Adelaide. 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. We recommend that the State Government investigate the opportunity for a second intermodal facility.<br><br>When fully developed, GEP has the capability to host over 37,000 jobs in industries such as advanced manufacturing, logistics and warehousing.<br><br>The Cities of Playford and Salisbury have undertaken investigations (Master Planning and Development Strategy 2021, City of Salisbury Strategic Growth Framework 2022) into the infrastructure requirements for GEP and the key constraints preventing development is the absence of a suitable road network, regional stormwater, water and sewer infrastructure.<br><br>To realise the economic and employment potential of this land,<br>State government 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.<br><br>An efficient funding mechanism needs to be established to deliver this infrastructure moving forward. The provision of enabling infrastructure will unlock higher economic productivity and growth. |
| **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. (*See appendix A North-West Economic Corridor*). The corridor is bookended by future residential growth hubs at Dry Creek in the City of Salisbury and Riverlea in Playford, which is in its early days of establishment.<br><br>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.<br><br>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. |

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| **Expansion of Edinburgh Defence** | The Edinburgh Defence Precinct is a key national research and manufacturing hub. The precinct is home to the RAAF Base Edinburgh – one of two super-bases in Australia accommodating 5,000 military personnel, public servants and contractors; Defence Science and Technology Group; and major defence companies.<br><br>There is a strategic opportunity to expand the Defence 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 off-shore and further cement SA as the Defence State.<br><br>Expansion of the precinct will provide a strategic advantage to SA's defence capability, enabling job creation in the defence and aerospace sector. 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.<br><br>A well-planned precinct that identifies land for future defence-related activities and strategic land acquisition will prevent non relevant industries moving in. It will ensure the protection and future proofing of Adelaide's defence industry, as well as attract a skilled workforce whilst supporting a growing population. |
| **Playford Health and Wellbeing Precinct** | 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.<br><br>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.<br><br>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.<br><br>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.<br><br>There is a need to expand the Playford Health and Wellbeing Precinct to improve the living standards of people in the north of Adelaide, as well as meet the needs of a growing population. |

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| **Gawler River Flood Protection** | The Gawler River and surrounding region is subject to major flooding, averaging a flood once every 10 years over the past 160 years. 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.<br><br>Additionally, flooding from the Gawler River impacts horticultural areas within the Northern Adelaide Plains - one of Australia's most significant horticulture regions, currently valued at $555 million farmgate.<br><br>Infrastructure SA identified the need to develop a business case in their Capital Intentions Statement to identify the most appropriate flood mitigation measures. The Department of Environment and Water are working with affected councils to develop the Gawler River Flood Mitigation Business Case (information available from the DEW website). The business case is being assessed against Infrastructure SA's Assurance Framework and it is expected to be finalised by the end of 2023.<br><br>The ultimate flood mitigation solution will require all three tiers of government support and funding, which is reflective of the capacity of each level of government to raise revenue. The implementation of the flood mitigation measures will improve resilience to flood events, help avoid disruptions to our supply chain, enable the investment and diversification of industry within the Gawler River catchment area and protection of existing communities. |

# Enabling infrastructure to foster liveable and well-planned places

Council acknowledges that the State Government contributes to the cost of enabling infrastructure. However, in growth areas an increase in contribution to infrastructure funding is of paramount importance. Essential infrastructure such as transportation, utilities, and community facilities support positive economic outcomes as well as quality of life.

## Infrastructure funding

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 and key infrastructure upgrades were not identified through the development of the deeds (e.g., the need to upgrade road pavement).
- 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 the Riverlea residential development, no consideration has been made for public transport. As such, car-dependent communities are being created.

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 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, Water Sensitive Urban Design 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.

Alternative funding mechanisms providing a more equitable cost share across all tiers of government and the development industry need to be considered.

## Rapid Mass Transit

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 and fund a suitable future rapid mass transit corridor that is separate to the existing 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 increasing car emissions. Consideration must also be given to existing public transport frequency and connectivity.

## Sewering

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
- Upgrade, where a lack of sewering will hinder commercial development.

Given the lag in SA Water timelines for providing mains sewer to some locations and capacity constraints with current trunk sewerage infrastructure 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.

The current regulatory environment SA Water functions under hinders delivery of trunk infrastructure to service new growth areas ahead of development, preventing timely responses to changes in market conditions and potentially poor planning outcomes. A review of the regulatory environment is recommended.

## Transport improvements for residential growth areas

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 and will maximise transport outcomes from the investment made in the Northern Connector. Notably these roads are primarily facilitating east-west transit, which is generally poor due to the capacity of the roads.

| DIT Road | Comments |
|---|---|
| **Curtis Road** duplication and grade separated crossing at Adelaide-Gawler Railway line. | This is Council's most congested road. Infrastructure SA has identified in their Capital Intentions Statement 2021, that further studies needed to be undertaken to validate previous traffic analysis, substantiate the need and determine the most appropriate solution. Council is working with DIT to undertake a traffic analysis and planning studies. |
| **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.<br>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. |

## Community facilities

A significant disadvantage in SA is that there are no agreed upon standards of provision for social infrastructure to guide development. Planning for social infrastructure needs to occur early in the planning process and the land allocated accordingly.

The importance of social infrastructure investment in growth areas cannot be overstated, as it is essential for creating vibrant, liveable and well-planned places. These essential spaces play a pivotal role in enhancing the overall quality of life for individuals and fostering social cohesion within communities.

The challenges that a growth council encounters are the timely delivery and funding of community infrastructure. An example is the delivery of City of Playford's Angle Vale Community Sports Precinct. The Angle Vale Community Sports Precinct Master Plan was developed in 2010, delivered in five stages, over 12 years, costing $10.2 million. The precinct comprises: a community sports centre, two full sized soccer pitches, one junior soccer pitch, six netball courts, club room facilities, eight changerooms, two shared football / cricket ovals, picnic area and walking trail. Additionally, there are future plans to develop a community centre and dog park within the precinct.

*The City of Playford Sports Facility Strategy 2023* has identified the need for another five facilities of the same calibre to be built to service the growing community. Ongoing and coordinated Federal and State Government co-investment is crucial to ensure that our communities have the necessary facilities to meet their recreational needs. Early commitment and planning is required for the provision of schools, health facilities and social housing. Legislative reform is needed for upfront allocation of land for such facilities, during the rezoning process needs to be considered.

# Education and skills create a productive workforce

In line with the *SA Economic Statement,* investment in education is critical to ensure we have a workforce that can deliver for our current and future needs. There needs to be a balance between attracting skilled people to SA and skilling up residents of SA. The removal of barriers to participation, particularly for minority and marginalised groups must be addressed to ensure our state is future ready.

## 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 ABS Census of Population and Housing 2021, only 8.4% of the Playford community had obtained a university degree, compared with 26.3% for Greater Adelaide, which is a significant barrier for the community to fully participate in future economic and employment opportunities.

The presence of a university in Playford will help address barriers to further education that people from the northern Adelaide, which include (but are not limited to) distance, lack of access to transport and the stigma associated with coming from northern Adelaide. Elizabeth, holds a unique geographic position in northern Adelaide, serving as a central destination and catchment area drawing from the broader mid-north region of the State.

## Elizabeth TAFE SA upgrade

TAFE SA is at the centre of the Education Precinct in the Elizabeth CBD, which also includes St Patrick's Technical College, Northern Sound System and Northern Adelaide Senior College (NASC).

There is an opportunity to expand the current Education Precinct into a learning and innovation precinct in the north of Adelaide, similar to Tonsley in the south, encompassing tertiary and vocational learning. The upgrade of the Elizabeth TAFE SA, with a focus on aligning training to industry needs will provide an enhanced learning environment and an integrated pathway to employment opportunities and further tertiary education. It is important to have high quality, modern and community facing facilities at Elizabeth TAFE to reduce barriers of entry and normalise vocational training within the community.

With employers seeking individuals that have diverse educational backgrounds, there is an opportunity for the education sector to align its offerings with the key industry sectors of the region. There is also an opportunity for the TAFE to work together with local industry to provide students with opportunities for work experience and internships. Collaboration with local industry would prepare students for the demands of the job market. By tailoring educational offerings to meet the evolving demands of key employment sectors, we can create a skilled local workforce and prosperous economy.

# Closing statement

Aligning *South Australia's 20-year State Infrastructure Strategy* with the *Greater Adelaide Regional Plan* and departmental infrastructure priorities to support the residential growth for the State, will provide a strategic and coordinated approach to infrastructure planning and development for South Australia, laying the foundations for a prosperous economy, sustainable and resilient future.

It is imperative that serious consideration be given to growth areas, particularly the City of Playford and more broadly northern Adelaide, ensuring infrastructure needs are met now and into the future to ensure the needs of a growing community are met.

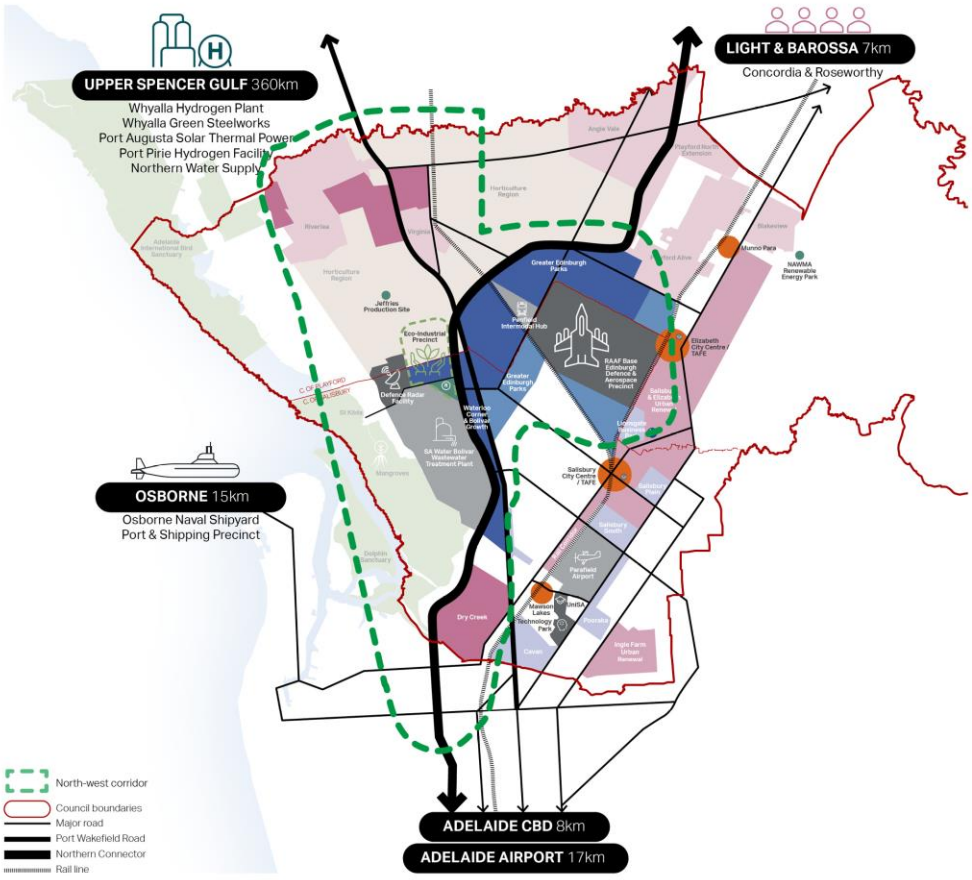
The City of Playford values the opportunity to provide feedback for consideration to Infrastructure SA in relation to *South Australia's 20-Year State Infrastructure Strategy Discussion Paper October 2023*.

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 look forward to further engagement and providing any additional information that you may require leading to the next stages in finalising the *South Australia's 20-Year State Infrastructure Strategy*.

# Appendix

## Appendix A - **North-West Economic Corridor**



## For further information contact

Greg Pattinson, Executive Strategic Advisor
City of Playford
[redacted]

## 14.2.9 Greater Adelaide Regional Plan Discussion Paper - PAE Submission

| | |
|---|---|
| **Report Type** | Decision |
| **City Plan Theme** | Economy<br>Environment & Heritage<br>Placemaking |
| **Report Author** | Strategic Urban Planner, Corporate Services |
| **Report Summary** | The State Planning Commission has released the *Greater Adelaide Regional Plan Discussion Paper* for public consultation. The paper makes urban planning proposals for the Greater Adelaide region and certain locations in Port Adelaide Enfield over the next 30 years. This report discusses the key features of the paper, with a view to lodging a Council submission. |
| **Attachments** | 1 – A3 map: sites of interest in PAE<br>2 – Draft submission to the State Planning Commission<br>3 – Submission from AdaptWest |

**RECOMMENDATION**

**Council resolves that:**

1. **The report of the Director Corporate Services titled "*Greater Adelaide Regional Plan Discussion Paper – PAE submission*" be received and noted.**
2. **The draft submission on the *Greater Adelaide Regional Plan Discussion Paper*, which comprises Attachments 1 and 2, to this report, is endorsed for submission to the State Planning Commission**
3. **The AdaptWest submission that forms attachment 3 to this report is noted.**
4. **Subject to Council's approval of the draft submission, copy of the final submission is lodged with Infrastructure SA as Council's initial input to the preparation of the 20 Year State infrastructure Strategy.**

**Report**

Background

In accord with the *Planning Design and Infrastructure Act 2016*, the State Planning Commission is required to prepare regional plans for different areas of the state. The purpose of a regional plan is to express an urban planning vision (over a 15-to-30-year period) that relates to land use, transport, infrastructure, and the public realm.

The City of Port Adelaide Enfield is located in the Greater Adelaide planning region, which is currently guided by the *30-Year Plan for Greater Adelaide*. (This region spans from the Light Regional Council in the north, down to the Yankalilla District Council in the south.) The current *30-Year Plan* was published in 2017, and is typically updated every five years. The State Planning Commission is preparing an updated plan, which will be renamed the

*Greater Adelaide Regional Plan* (or "GARP"). In August 2023, the Commission released a discussion paper on the new plan for public consultation.

As part of this process, a workshop with Elected Members was held on 5 September 2023 to identify key priorities to be addressed in Council's submission. This exercise was guided by the map provided in **Attachment 1,** (this attachment forms part of the Council's formal submission on the discussion paper).

The purpose of this report is to recap the key features of the GARP discussion paper, and to seek endorsement of a Council submission, based on the insights gained from the workshop and analysis of Council's existing policy and strategic positions.

GARP Discussion

The discussion paper is structured around four overall outcomes:

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

The discussion paper envisages a future scenario of large-scale growth over the long term. Key features (for the region as a whole) include:

- A population increase of 670,000 people over the next 30 years
- The construction of 300,000 new dwellings to accommodate the population growth
- An adequate supply of zoned land to accommodate new housing, beyond the next 15 years
- A greater range of housing types (with higher densities in selected areas) catering to changes in demography, household formation, and market preferences
- Four 'major transport spines', two of which include Port Wakefield Road and the South Road/North-South Motorway
- The reintroduction of the Metropolitan Open Space System.

A number of proposals have been nominated for investigation within the City of Port Adelaide Enfield. These would be pursued at an unspecified time in the future, and include:

- 'Proposed areas of investigation: neighbourhood centre and regeneration' for:
    - Port Adelaide Centre
    - Woodville Gardens and environs
    - Kilburn/Blair Athol.
- 'Proposed areas of investigation: strategic infill' for
    - Briens Road, Northfield
    - Northwestern Lightsview
    - Cowan Street, Angle Park
    - East of Fosters Road, Oakden.
- 'Proposed corridor investigation areas' for:
    - Churchill Road, Prospect Road, Main North Road
    - North East Road
    - Torrens Road.

- A ‘Mass Rapid Transit Investigation Area’ in the vicinity of Briens Road, Hampstead Road, Main North Road, and Prospect Road.

Regarding the above, the paper advises that “*establishing a schedule of strategic infill sites and estimating their full residential potential in the medium to long term is difficult due to uncertainly around landowner intent. Part of the detailed investigation process would be to develop a methodology of how to identify and prioritise new sites.*” It is therefore understood that the draft GARP will provide more detail on these proposals next year - when the plan is released for statutory consultation.

As noted in the September workshop, Members were broadly open to investigations in selected areas, but stressed the need for a nuanced approach by the State Government. This would need to recognise the realities such as current-day traffic congestion levels, existing residential character, and infrastructure capacities.

A draft submission has been prepared in response to the entire paper for Council’s consideration (refer **Attachment 2**).

The draft 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.

Following the close of the consultation period, the Commission will consider submissions and continue drafting the GARP document. Following this, the GARP will be released for statutory public consultation, which is expected to occur by mid-2024. It is envisaged that future Council workshops and reports will be held upon the GARP’s formal release.

**Other submissions**

***AdaptWest – climate change priorities***

Also attached to this report as **Attachment 3** is a copy of the AdaptWest submission that has been prepared by the program's working group and signed off by the program's regional coordinator. The submission reflects the following priorities and adaptation pathways from the endorsed AdaptWest Regional Climate Change Plan 2016:

- Need to ensure community and business resilience
- Protection of estuarine water and need for water sensitive urban design
- Importance of coastal landscapes
- Maintaining existing and expanding open green space
- Protecting public coastal built assets and stormwater infrastructure from climate change impacts and hazards
- The important of transport and essential services in future proofing.

All content in the AdaptWest submission reflects the Plan's endorsed adaptation pathways and priorities (see: https://www.adaptwest.com.au/sites/adaptwest/media/pdf/adaptwest-climatechange.pdf.

Each partner council (Cities of Charles Sturt, Port Adelaide Enfield and West Torrens) is presenting the submission to their councils for noting and for lodgement as part of their separate submissions to the GARP discussion paper.

**South Australia's 20-year Infrastructure Strategy**

In early October 2023, Infrastructure SA released a discussion paper to inform the development of the State's next 20 Year Infrastructure Strategy. A copy can be accessed here: 20-Year Strategy | InfrastructureSA

This strategy will assess statewide infrastructure needs, strategic goals and priorities for 2045. Key issues addressed in the paper are:

- Megatrends impacting infrastructure in SA
- Growing the economy with infrastructure
- Enabling infrastructure (water, freight networks, energy, digital, resource exports)
- Liveable and well-planned spaces
- Accessible and inclusive infrastructure
- Decarbonised and sustainable economy
- Improved resilience
- Stronger infrastructure industry (including procurement and funding/financing solutions)

Consultation on the discussion paper closes on 13 November 2023

Given this timeline and poor notification of the release of the discussion paper, there has been inadequate time to prepare a submission for Council's consideration. However, consultation with Infrastructure SA staff is that they would welcome the receipt of Council's submission on the GARP discussion paper as initial input to this strategy development.

Given the GARP submission addressed key infrastructure issues, it is therefore recommended that a copy of the approved GARP submission is lodged with Infrastructure SA. This would include a covering note advising that this is initial input only given the lack of time available to prepare a full submission and, stating the importance of this agenda to Council and the city's future prosperity and resilience.

**City Plan Relationship**

The discussion paper is relevant to all the themes in the *City Plan 2030*, including:

- Economy - 'Ensure an infrastructure led approach to urban development' (p. 10)
- Environment & Heritage - 'Increase the City's tree canopy coverage and greening in hot spots and public places' (p. 19)
- Placemaking - 'Work with other tiers of government and the private sector to deliver high quality placemaking outcomes' (p. 22).

**Legislative Context and Related Policies**

The Commission's preparation of Regional Plans is governed by Section 64 of the *Planning, Development and Infrastructure Act 2016*, though the preparation of a discussion paper is not mandated by the legislation.

**Stakeholder Engagement**

The State Planning Commission undertook various public consultation exercises during the paper's consultation period, which included technical workshops with Council staff. Written submissions on the paper will be made available online, with an *Engagement Report* to be published at a later date.

The deadline for submissions was 6 November 2023, with Council granted an extension pending the outcome of the November Council meeting.

When the draft plan itself is released for statutory consultation in 2024, it will use a dedicated engagement plan developed by the Commission. This plan is yet to be developed but is expected to be and announced over the coming months.

**Risk Management**

The risks and consequences of the paper are considered to be low, nothing that:

- It is a discussion paper only, with many of its proposals being general in nature.
- Some of the proposals may be changed or abandoned by the plan itself.
- The draft plan will undergo public consultation in 2024.

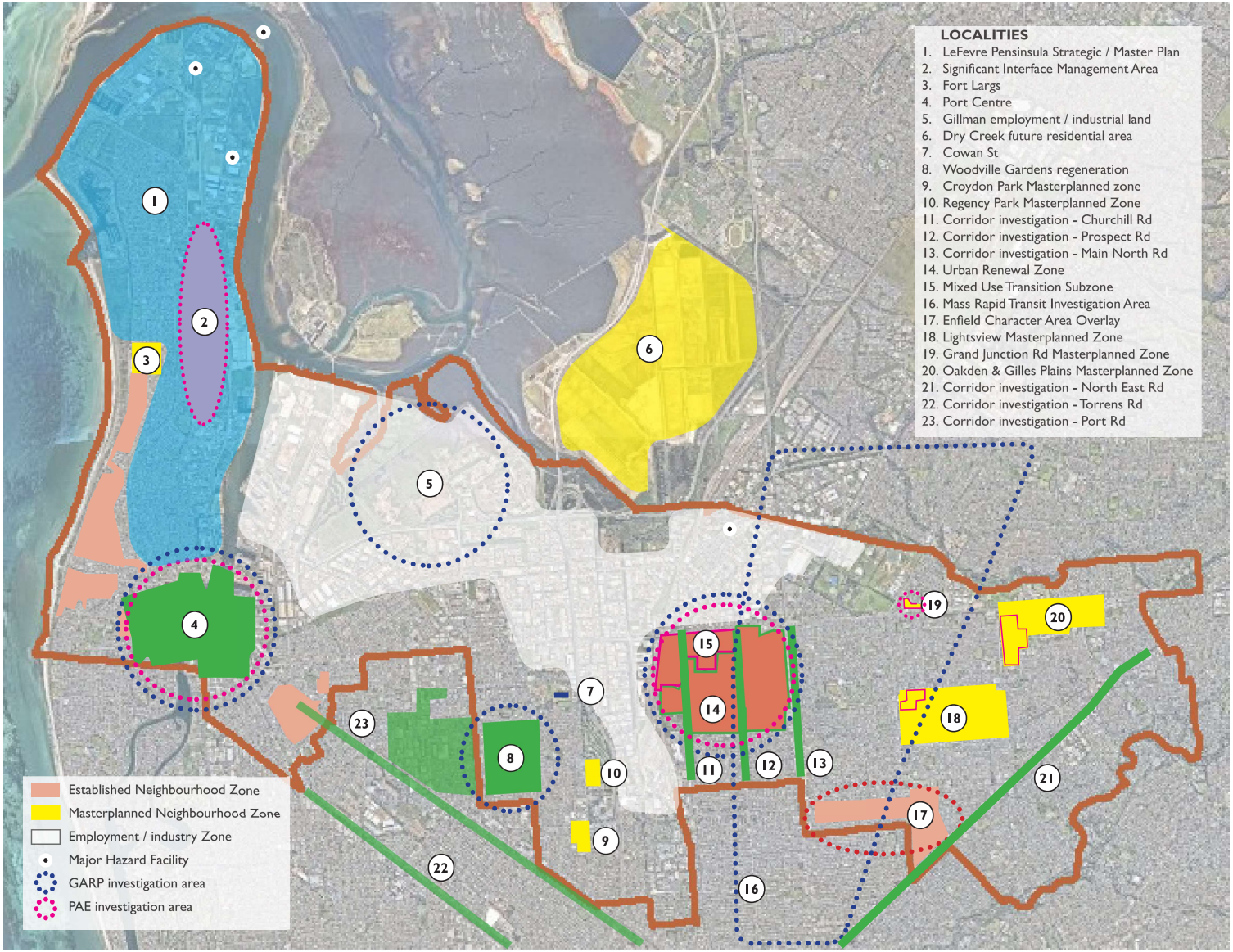
Council staff will manage this (low) risk by monitoring the outcomes of the discussion paper, awaiting the release of the draft plan, and by preparing a Council submission on the draft plan at the appropriate time.

**Financial Management**

The paper is not expected to affect the Council's budget for the current financial year.

**Environmental and Social Impacts**

The Greater Adelaide Regional Plan will have a significant bearing on environment and social issues. The attached draft submission raises various concerns about how the plan can be written to deliver better environmental and social outcomes.


LOCALITIES
1. LeFevre Pensinsula Strategic / Master Plan
2. Significant Interface Management Area
3. Fort Largs
4. Port Centre
5. Gillman employment / industrial land
6. Dry Creek future residential area
7. Cowan St
8. Woodville Gardens regeneration
9. Croydon Park Masterplanned zone
10. Regency Park Masterplanned Zone
11. Corridor investigation - Churchill Rd
12. Corridor investigation - Prospect Rd
13. Corridor investigation - Main North Rd
14. Urban Renewal Zone
15. Mixed Use Transition Subzone
16. Mass Rapid Transit Investigation Area
17. Enfield Character Area Overlay
18. Lightsview Masterplanned Zone
19. Grand Junction Rd Masterplanned Zone
20. Oakden & Gilles Plains Masterplanned Zone
21. Corridor investigation - North East Rd
22. Corridor investigation - Torrens Rd
23. Corridor investigation - Port Rd
Established Neighbourhood Zone
Masterplanned Neighbourhood Zone
Employment / industry Zone
Major Hazard Facility
GARP investigation area
PAE investigation area

# 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 successful 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:

- 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]

DRAFT

Jeremy Miller
AdaptWest Regional Coordinator
On behalf of the Cities of West Torrens,
Charles Sturt and Port Adelaide Enfield
c/o City of Charles Sturt
PO Box 1
Woodville 5011
PH: 0499 559 393

DATE 6/11/2023

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

**Re: AdaptWest Submission – Greater Adelaide Regional Plan Discussion Paper**

Dear Sir / Madam

AdaptWest is pleased to provide the attached response to the Greater Adelaide Regional Plan discussion paper.

This response draws on the adaptation decision pathways which are a feature of the AdaptWest Regional Climate Change Adaptation Plan (2016). The submission highlights the role that land use planning has in mitigating the impacts of climate change and adapting to the changes that have already occurred, and likely to impact the region in the next 20 – 30 years.

**This response will be considered by each of the partner councils at their respective November 2023 council meetings and is embargoed till 27th November 2023.**

Please do not hesitate to contact me to clarify any aspect of the attached.

Your faithfully

[redacted]

Jeremy Miller
AdaptWest Regional Coordinator

# Greater Adelaide Regional Plan
# response from the
# AdaptWest Regional Climate Partnership

***Climate thresholds and adaptive capacity in responding to present and future land use planning concerns.***

## About AdaptWest

AdaptWest is a **Regional Climate Partnership** (RCP) in Western Adelaide that comprises the cities of West Torrens, Charles Sturt, and Port Adelaide Enfield. The Western Adelaide Region in South Australia lies between the city and its busy beaches and ports along the coastline of Gulf St Vincent. The region is often referred to as "the engine room of the State", with many small, medium, and large manufacturing businesses; road, rail, sea and air freight intermodal exchange, warehousing and State and Federal strategic infrastructure including power stations, hospitals, Adelaide Airport, a wastewater treatment plant, and defence ship building.

There are several key urban renewal projects across the region including the Green Star communities project centred on Bowden, reviving the former industrial land through reuse as a thriving mixed use residential community. Western Adelaide is also home to iconic entertainment destinations, with the Thebarton Theatre, The Entertainment Centre and The Governor Hindmarsh all located in the region. The region is home to approx. 22% of Adelaide's population including a high number of vulnerable people. Due to a legacy of industrial land uses and the on-going pressures with urban infill, the region also has one of the lowest tree canopy cover percentages for any metropolitan region in Australia and is highly exposed to flood risk, sea level rise and heatwaves. Climate change continues to pose some unique challenges to the infrastructure, economy, and lifestyle of this special and important region.

## Climate Change and Urban Planning

The **Greater Adelaide Regional Plan** (GARP) provides an opportunity to understand and address land use planning mechanisms and the systemic risk that is posed by climate change and in doing so, reduce population scale vulnerability while creating a city that has a robust, resilient, and diverse ecological landscape, capable of buffering the impact of change as the Adelaide climate shifts inextricably from a Mediterranean to a semi-arid environment.

This response to the **GARP Discussion Paper** seeks to frame some of the key regional **climate thresholds** and **adaptation options.** These should be understood and addressed in the way the region is developed, and work to mitigate risk by proactively dealing with compounding impacts that have the capacity to undermine the **social, economic, and ecological resilience** of the region. This is a crucial role for land use planning and how

regulatory instruments are used to build resilience in our urban environment. Each of the following headings represent an **adaptation pathway** in the AdaptWest Climate Change Adaptation Plan, which have associated decisions in time and thresholds for these decisions. It is important to understand these **thresholds**, as the decisions we make *now* about the *future* shape and form of Adelaide, have ramifications and effects which can be decadal in operational impact, having the capacity to actively increase resilience to climate change, or conversely, lock social and economic vulnerability into the function of the urban system.

## Business Resilience

Businesses and employment centres are important not just to the Western Adelaide regional economy, but to the prosperity and economic diversity of the State. To embrace "Living Locally", employment centres will need to be developed that support transport, exchange, and resilience not just of the business operation, but for the employees who work for these businesses.

Key risk **thresholds** that should be addressed through land use planning and associated mechanisms include:

- Flood risk from storm surge and increasing rainfall intensity which impacts business continuity, resulting in declines in the profitability of local business and industry, such as by impacting access to freight routes or through the closure of main street shops and businesses; or
- Operating costs for business and industry increase above viable levels.

To maintain business continuity, land use planning needs to assess site-based risks along with other legislative mechanisms (for example EPA licencing) to address risk to business operation. Aligning with mitigation through a circular economy framework is also important to ensure the composition of industrial land use best supports this goal.

## Community Resilience

A key consideration in the GARP should be that the spaces and places we build and construct, are resilient to a changing climate and hence support community resilience.

The **thresholds** below influence when adaptation options that build community resilience are implemented, and the role land use planning can play in this implementation.

These thresholds include:

- Increased deaths or hospital admissions because of extreme events, for example: homes that do not protect occupants in extreme heat conditions.
- Insurance premiums increasing, to the point where insurance is no longer affordable compared with household income or when council event-based insurance is so high that activities become cost prohibitive.
- Frequency of home floor level inundation (e.g., occurs more than twice a year)
- Cost of repair from flood or storm damage.
- Requests for emergency services responding to extreme events.

- The number of council events cancelled as result of extreme events (e.g., 2 major events or > 3-4 minor events)
- The frequency of days over 35ºC occurring to the point that operating hours of services and facilities need to change.
- Flooding of community facilities.

It cannot be stressed enough that the places we build and develop over the next 30 years will contribute to a large sunk investment in the trajectory of not just Net Zero emissions, but to community resilience and the ability to respond positively to climate threats. It should be noted that these threats are not some abstract concepts set in the future but are *already* being experienced by our community as a result of past inaction, poor regulatory frameworks, lack of industry response and poor development control that increases vulnerability. These issues do not have an easy one-size-fits-all solution because they are complex. However, regardless of past inaction, the GARP does have a key role in setting the agenda for forward planning the resilience of our current and future development processes, and the shape, form and function of our urban environments.

### Estuarine waters

Impacts on receiving water bodies during higher peak storm flow will be an issue in managing water quality and mitigating flood. Land use planning and urban design, along with necessary infrastructure to slow water flow and improve water quality will be important.

Adaptation **options** available to AdaptWest that need to be supported by the GARP include:

- The GARP to support the work already occurring across local government to develop and encourage greater adoption of water sensitive urban design (WSUD).
- GARP to acknowledge the ongoing work with agencies to improve upstream catchment management. Reducing stormwater pollutant loads and managing stormwater flows through initiatives like *Waterproofing the West* are required.

### Natural Landscapes – Coastal

Coastal landscapes provided ecological services to buffer the impacts to human activities of sea-level rise, storm surges and associated erosion.

Key regional considerations that need to be supported by the GARP include:

- Amending land use planning policy. Major infrastructure projects and land division associated with **major projects** (e.g. proposed residential development on the former Dry Creek Saltfield), should consider how to protect local coastal assets and tidal wetlands.
- Land use policy to acknowledge the impact of coastal processes, to **manage expectations** regarding on-going accessibility and maintenance levels. It is anticipated that this will improve the community's understanding of how sea level rise and associated erosive impacts will influence beach condition and access and the extent to which these can be effectively maintained.

- Improving coastal water quality to **protect and enhance** sea grass. Sea grass communities in the near-shore marine environment provide significant protection in moderating the impacts of storm surge events and are also important in moderating sand movement in the Region. Improving coastal water quality requires management of inflows (stormwater quality and quantity) and marine activities (including shipping, boating and recreational activities).
- Acquiring land in high-risk areas to **allow for retreat**. The natural movement of beaches and dunes as the sea level rises would be to migrate inland. Barriers to natural migration such as roads and other built infrastructure means migration cannot occur and beaches may be lost. Along some parts of the Region's coast, acquiring land in high-risk areas will enable retreat, meaning that beaches and dune can be maintained for longer periods.

The service and amenity of Adelaide's beaches is a key concern for the Western Adelaide region both in terms of the social and recreation attraction, but also the ecological services and protection of near coast built assets. The GARP needs to recognise and support endeavours to protect and enhance beach zones and manage the dynamic and changing landscape over time.

## Open and Green Space

Maintaining existing, and strategically expanding open and green space needs to be **embedded in the planning system** at all levels. Ecological services (e.g., shade and evapotranspiration, flood mitigation, particulate filtering, biodiversity etc.) should form the ***new business as usual*** of land division, planning and urban resilience.

Key concerns for Western Adelaide to provide on-going service to the community include:

- Designing and constructing climate resilient open space and recreation facilities. This will require the use of a range of climate-resilient designs and materials to ensure that investment in new open space and recreation facilities or upgrades considers future climatic conditions. Changes to landscaping practices may also be required, for example reduced areas of turf and more 'urban forest'. These concerns are echoed in residential construction that needs to be planned, designed and constructed to **take account of future, not past climate conditions**.
- The GARP can seriously consider options to partner with local government to invest and **acquire strategic property holdings** to increase green open space. Strategic acquisitions of land will aim to provide additional areas for recreation but will also consider how best to maximise urban greenness and reduce the impact of urban heat islands. This is particularly relevant in areas of urban infill and higher density developments where the existing minimum open space guidelines may not be sufficient to allow for improved urban cooling and dissipation of excess heat.

Open space will play a key role in supporting resilient communities to respond positively to climate change. In doing so, open space managed by local government will need to be robust, connected, functional and distributed allowing for infiltration of water and the

growth of a significant canopy contribution supporting the health and biodiversity of our city.

### Public Coastal Built Assets

Key to managing public infrastructure is understanding the climate impacts in terms of the functional return on investment, maintenance, and useful life of assets.

**Thresholds** that relate to the GARP include the following:

- Flood impacts that damage built assets, cause over-floor flooding and disruptions to transportation from road closures.
- Increasing maintenance costs and frequency of repairs to assets. An important trigger for action will be when these costs become unviable for Councils, particularly regarding the management of beach sand erosion.
- Damage to public assets such as levee banks and built structures due to sea level rise or storm surge.
- Reduced public access to facilities like surf lifesaving clubs leading to community services not functioning effectively.

Again, these concerns are set as **clear and present** dangers and should not pushed to some point in the future. Conversations that recognise a pre-cautionary principle in response will be required, especially since assets we build may have their useful life degraded earlier in the asset lifecycle, requiring premature repair or replacement (or abandonment), impacting not just long-term financial plans, but the reptation and resilience of government and the communities we support.

### Stormwater Management Infrastructure

Much of Western Adelaide is vulnerable to flooding during peak rainfall events. The combination of **sea level rise and increased peak flow** further exacerbates this risk.

Key **thresholds** that should be accounted for via GARP mechanisms and adaptation planning include:

- Monitoring of the number of un-insurable homes in the region. ,
- Deaths occurring because of extreme events.
- Increased frequency of houses experiencing over floor level inundation.

To proactively address these risks a range of **planning policy and construction code** regulations will be required including:

- An increase in onsite detention, storage, and re-use strategies in place prior to discharge to stormwater systems
- Amend land use planning policy regarding **finished floor levels** with consideration given to the need to raise floor levels of existing homes and businesses.
- Consider medium term investment and land use planning to **relocate or abandon** homes and businesses at risk of flooding.

The GARP should direct *where we build and what we build*. Dealing with flood risks likely to occur over the near term (30 years) lifecycle of buildings will be essential to ensure that the sunk capital invested in the built environment is not compromised through lack of affordable insurance and the subsequent flow on effect this will have to mortgages and then the greater economy. This will include a necessary evaluation of on-going clean-up and remediation costs as impacts from successive events cascade, compounding negatively.

## Transport and Essential Services

Public and active transport will play a key role in the future of urban **mobility** across the greater Adelaide region. To proactively manage risks to transport infrastructure the GARP will need to take account of the need to enhance existing corridors and expand and strengthen links both now and in the future.

Key **thresholds** that should be considered by the GARP include:

- Flooding impacts resulting in the closure of both local roads and major transport routes impacting the **provision of emergency services**. This will be especially important for hospital access and evacuation routes.
- Increasing **frequency and extent** of flooding causing track slumping and damaging the rail network
- **Reduced utilisation** of public transport because of reduced access and/or unsuitable conditions (e.g. too hot to wait at the bus stop)
- Increasing **hospital admissions** because of extreme events
- The closure of main street shops and businesses resulting in loss of regional **economic activity**
- Increasing **insurance** premiums.

To realise the goal of "Living Locally", ambition, investment and action will be required to drive cultural change rapidly and at scale. This will necessarily see a reduction in private car use regardless of the fuel source or tailpipe emissions that vehicle represents. Simply put, we need *fewer private cars* contributing to congestion and urban sprawl. It is well-known, but perhaps not well-understood, that continuing to build roads, widen intersections and expand carriage way widths, *does not* reduce congestion, and only induces demand. Increased utilisation of public transport, integrated with active transport end-of-trip facilities, is one piece of the puzzle in demand reduction for the private automobile fleet, something that the GARP needs to recognise as essential and embedded in land use planning, to drive rapid transformation change, rather than the business-as-usual paradigm of building more roads and releasing cheap land on the fringes of our city.

## Urban Living

The GARP represents an opportunity to reform standards, regulations and land use planning policy to promote and encourage development, urban design and a public realm that is climate resilient. The AdaptWest plan calls for *"major investment to increase green urban spaces and increase tree canopy cover in the public and private realm"* and to ensure that

*"trees can mature and provide the benefits of addressing the urban heat island effect before the middle of the century."*

The plan also acknowledges that *"relocating some homes, businesses and infrastructure in high-risk areas may need to be considered within 20 years".*

A key **threshold** related to **population health** will be mortality resulting from extreme events, particularly because of heat stress due to air conditioners not operating during power blackouts. An increased frequency of above floor level inundation is also considered a key threshold, with a trigger for action identified by the Region's stakeholders to be if such events were to occur more than once every 8 years.

Additional **thresholds** that will influence the timing and implementation of adaptation options include:

- Grass and vegetation mortality that may be exacerbated by the urban heat island effect.
- Increasing irrigation demand (e.g., demand for groundwater above allocated volumes)
- Increasing hospital admissions as result of extreme events.
- Increasing cost of living (e.g., as electricity demand increases) and repair from flood damage.
- Inability to access homes during flooding.
- Increased rates of households that are uninsurable due to climate driven impacts.

**In conclusion**

This submission has briefly attempted to summarise what are complex and intersectional issues already being faced by Western Adelaide and the Greater Adelaide Region, from the present day, to over the next 20 - 30 years.

While the effect of some of these issues can be mitigated by proactively and honestly responding to change, the **recognition** that adaptation will be ***inevitable*** due to the intersection of sunk investments, vulnerable infrastructure, and stranded assets, needs to be embedded in land use planning to drive the orderly development of resilient communities within a changing ecological landscape.

This submission calls for on-going investment that will be required ensure that the Greater Adelaide Region is resilient to a changing climate.

As such, the GARP needs to respond and embed the best available modelling and data into the planning system. It needs to acknowledge future scenarios at a policy level and operationalise these in response. Continuing to operate as "business as normal" will only introduce vulnerability and risk into the urban environment and will not protect our communities in the face of climate impacts that are already being experienced.

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13 November 2023

Contact: Peter Jansen

Strategy Team
Infrastructure SA
infrastructure@sa.gov.au

Dear Strategy Team

**Re: City of Salisbury - submission on the 20 Year State Infrastructure Strategy- Discussion Paper**

Thank you for the opportunity to make comments on the Discussion Paper. Council supports the independent approach to assessing the State's 20 Year infrastructure needs through the priority setting in the Capital Intentions Statement.

It is noted that this Discussion Paper and the recent Planning and Land Use Services Greater Adelaide Regional Plan Discussion Paper have a similar approach to identifying the trends, demographic snapshots, and outcomes for discussion. It is considered that there are opportunities for the Departments to align and reference each Discussion Paper as far as practicable, and of their timing to allow for consideration by Councils. It should be noted that due to the limited timeframe for consultation, this submission has not been able to proceed to Council endorsement, and is reflective of previous positions of Council. The Council may see fit in making changes to the submission after the closing date, and as such, it is requested that an allowance is made.

As background, I can advise that the City of Salisbury is well advanced in its strategic planning for growth through:

- A Strategic Growth Framework that provides clear direction for the rezoning of land west of Port Wakefield Road and is guiding Code Amendment proposals.
- Salisbury City Centre revitalisation agenda.
- Continued planning and delivery of strategic residential infill providing housing choice and affordability, such as at Lake Windemere and Walkley's 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.

Salisbury and Playford are a northern powerhouse in the defence, technology, manufacturing, and food industries. The Northern region has a critical role in the future of South Australia. The two cities comprise an area of over 500 sq km and cover an area north of Gepps Cross to the Gawler River. The region contributes $12.5 billion to the economy through its 11,500 businesses, international firms and entrepreneurs. The Greater Adelaide Regional Plan paper indicates that the current residential land supply will cater for the next 15 years, but that 100,000 homes will be needed over 30 years to support growth in the region.

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 City of Salisbury considers the North West Economic Corridor a prime location for these land uses (such as Renascor) due to its synergies with strategic infrastructure proximity to the labour force, higher education facilities and other industries. However, the opportunities are limited as so far as there is a lack of infrastructure co-ordination on state roads, water and sewerage supply. In addition, a significant investment in trunk stormwater infrastructure is required. Highly functional digital connectivity to this region is also paramount to attract investment in this region.

While it is imperative that the planning system identifies growth opportunities only well planned and co-ordinated infrastructure delivery can make this occur. Both planning and infrastructure agencies must work together to attract 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.

To this end both the City of Salisbury and the City of Playford have been collaborating on the delivery of co-ordinated growth for the two Councils' areas. This includes advocating for state infrastructure co-ordination through the newly established cross-government Steering Group for the North West Adelaide Economic Corridor and preparing a joint submission on the Greater Adelaide Regional Plan Discussion Paper and on the SA Water Regulatory Business Plan.

Employment Land Growth

There has been significant growth in economic development across the Council in recent years and there is ongoing demand for appropriately sized and serviced lands. Currently we have existing employment zoned land that cannot be serviced by sewerage, and the cost to do so is not economical while onsite systems limit the types of uses that can occur. This is detrimentally impacting on economic growth in the region.

It is also necessary to highlight that Greater Edinburgh Parks has been part of the State Government employment growth plan since 2012 and in conjunction with North West Corridor lands, they are highly sought after for employment lands. However critical SA Water infrastructure is unresolved. Water and sewer connections are required, and must be facilitated by the Infrastructure SA Strategy. A transport strategy for this area is also not resolved. Both issues have resulted in rezoning proposals not commencing.

In addition, there are other employment growth areas within the Council area including the growth in the next five years of the RAAF Base Edinburgh, Industrial lands at Parafield Airport and the extension of Technology Park. These developments will have additional impacts on the State's road networks and other infrastructure capabilities.

Transport and Roads

The City of Salisbury is facing challenges with its transport network and is undertaking its own local area transport studies. With residential and employment growth, our roads are becoming congested particularly due to a lack of east-west connections and there is conflict between freight and residential movements in the northern areas. It has been Council's priority to continually advocate for immediate action for the upgrades to Kings Road, Elder Smith Road and the grade separation of the Kings Road and Park Terrace Rail crossings.

In addition, while the electrification of the rail line has been a good outcome for our community, the significant majority of our community do not travel to the city every day. Public transport provision could be improved significantly to better align with our community's destinations by providing east-west connections. Investigations should also commence to consider mass transit systems for future growth, not just the growth in employment areas but future residential growth at Dry Creek and other areas in the northern region of Adelaide.

The potential exists for the State to take the lead on developing an Integrated Transport Strategy. A well-planned network will increase efficiencies for all sectors of the community.

Infill Development

Councils and the State Government should work together to manage and plan for the additional pressure that infill development has on infrastructure including the increased demand for services such as education and public transport.

The future recreational needs of our population must also be considered. Recreation and sport are 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 and facilities.

Other recreation and open space issues that should also be considered 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.

Infrastructure provision should be prioritised for areas within the existing urban boundary before servicing greenfield development beyond the boundary to ensure that infrastructure provision is efficient, cost effective and meets the requirements of infill growth.

Health and Wellbeing

Health and wellbeing should be considered in broader terms than only access to traditional health infrastructure. Wellbeing in particular is a wholistic term that is not only defined by an absence of disease or illness. Infrastructure that positively impacts on wellbeing should considered in the provision of the state's infrastructure. This may include urban planning considerations for housing, social connection, active transport, active citizenship and celebration of culture. Human level design of infrastructure and development that fosters a sense of belonging are important.

Health services and the change in the provision of these services in coming years is important to consider. People will be working from home more frequently, accessing health services online and preventative health will increase in importance. Health services with a focus on prevention should be increased to reduce the pressure on primary health care services which are already struggling to meet demand. The growing population of people aged over 65 and the importance of culturally appropriate health services will mean a one-size fits all, centralised approach to health care infrastructure should be assessed as to whether it is fit for purpose now and into the future.

Closing the Gap

To support the aligning Closing the Gap targets, infrastructure investment should consider the cultural requirements that encourage greater economic and social participation. This may include providing supporting infrastructure so that Prescribed Body Corporates (Native Title Holders) and Aboriginal Community Controlled Organisations can provide effective cultural governance and services to their communities. Including cultural recognition and meeting spaces in public infrastructure can support inclusion and enhanced feelings of safety in public spaces.

Housing and community infrastructure should be co-designed with relevant community groups and leaders, to ensure any investment meets local community needs and essential, health and digital services are provided and accessed effectively.

Future Proofing

Development of Dry Creek could provide the next tranche of significant population growth for our council providing for approximately 10,000 dwellings. However, feasibility assessment and detailed master planning 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, climate hazards and changing societal expectations that are likely to be experienced over the next 20-years. For example, the use of driver-less-vehicles, innovative public transport modes, micro mobility, decoupled carparking, higher residential densities, sea level rise, extreme weather as well as different ways of providing open space and recreation areas and biodiversity linkages.

The Infrastructure Plan must recognise the importance of the natural assets such as the mangroves, environmentally significant areas, International Bird Sanctuary, Dolphin Sanctuary and the need for coastal retreat and carbon sequestration in the northern region. Growth of the green and circular economy offers investment opportunities that will only increase over the lifespan of the Strategy.

It is important that strategic employment lands are also future proofed, not just by managing buffers to sensitive land uses, but by ensuring provision of sufficient and climate resilient infrastructure 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.

There is an opportunity to increase investment into stormwater harvesting and managed aquifer recharge systems to improve long term water security. Local government schemes will support and supplement sustainable growth, as well as improve biodiversity and ecological outcomes.

To assist in decarbonising, there must be increased supply of power infrastructure to support increased demand for growth areas and the transition to electric vehicles.

Climate change impacts on public infrastructure must be considered in the long term financial plans of organisations and the State Agencies, including the value of green and blue infrastructure.

Infrastructure Delivery

It is recommended that that the strategy investigates improved mechanisms for the funding of the delivery of state and local infrastructure delivery which is the major constraint for growth.

It is also necessary to identify the value of the less skilled employee to the employment network, and that skilled migration can be used in conjunction with work skill training programs to improve workers and business creation through appropriate infrastructure support and programs to the integration into a vibrant and strong community.

Conclusion

Council agrees that infrastructure is an enabler for development and economic growth, and raises the matters in this submission in anticipation of take-up by the State. However, it is essential that the State strategically plans for the required essential infrastructure to achieve the growth outcomes in the region, and includes the coordination of water, sewer, waste services, telecommunications and electricity in addition to the roads, stormwater and social infrastructure. To underpin the economic future of Northern Adelaide as envisioned by state and local governments, it is critical that an integrated infrastructure and land use strategy is prepared that provides a co-ordinated delivery of infrastructure that meets the requirements of the future land uses. A well-planned network will increase efficiencies for all sectors of the community and will attract the investment required for success.

We would welcome the opportunity to engage further with Infrastructure SA to progress the short- and longer-term strategies for infrastructure provision.

Yours faithfully

[redacted]

**John Harry**
Chief Executive Officer
Ph: [redacted]
E: [redacted]

Enc Joint submission to ESCOSA on SA Water Regulatory Business Plan.

4 October 2023

To ESCOSA
CC SA Water
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**SAWRD24 submission – Regulatory business proposal**

The Cities of Salisbury and Playford are pleased to provide a joint submission on the SA Water regulatory business proposal. The Councils' request that the Commission ensures that critical SA Water infrastructure, to facilitate the current and future residential and employment growth in northern Adelaide, is included in the **SA Water 2024-28 Regulatory Business Plan**.

The urban structure of metropolitan Adelaide is changing, with the vast majority of growth occurring in the outer northern suburbs. In the City of Salisbury and Playford, 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 within the region will house over 400,000 people in the Cities of Salisbury and Playford.

In addition to the residential growth, the Cities of Salisbury and Playford will provide significant employment lands in the next 15 years at Greater Edinburgh Parks (GEP) and in the North-West Economic Corridor (land west of Port Wakefield Road).

Greater Edinburgh Parks has been part of the State Government's employment growth plans since 2012, when it was identified as future strategic employment land in the *30-Year Plan for Greater Adelaide*. The State Government prepared a masterplan for the area and a few areas of employment land were rezoned at the time. The land is now being highly sort for development. Some 162ha is proposed to be rezoned now, but critical SA Water infrastructure remains unresolved.

The Cities of Salisbury and Playford 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 stage one of establishment.

It is imperative that SA Water strategically plans for the essential infrastructure in this region. The consequence of not providing critical SA Water infrastructure in an equitable manner, is a loss of significant economic development for the state.

Both councils are aware of existing zoned strategic employment land that is also being faced with prohibitive SA Water charges. There is significant inequity in the current distribution of costs to individuals.

In the City of Playford, the original townships of Angle Vale and Virginia are now surrounded by new residential estates, which will all be connected to mains sewerage. The challenge is in the original townships where the existing premises have on-site wastewater systems, with many of them close to the end of their life. These systems will need to be replaced in the near future. However, the size of existing blocks and existing structures on site makes it difficult to install new systems under the current design requirements.

Additionally, commercial developments particularly in the township main streets are hindered due to the lack of mains sewerage, resulting in lack of business expansion and investment. The need to replace systems will cause concern to individuals and the broader community. The preferred outcome and potentially only option for some homes is to connect existing homes to the SA Water sewerage system.

Both councils acknowledge that the SA Water 2024-28 Regulatory Business Plan identifies significant investment in water supply in northern Adelaide. However, this is predicated on the Minister enacting Section 6 of the Public Corporations Act 1993. This work is required to service the growth in northern Adelaide and should progress as part of planned infrastructure roll out and not be reliant on the Minister providing direction.

Both council's note that the plan does not identify any capital expenditure on the expansion of the sewer network. SA Water needs to ensure that it can respond to market demand for residential and industrial growth in northern Adelaide.

The Cities of Salisbury and Playford request that the critical SA Water infrastructure be included in the SA Water 2024-28 Regulatory Business Plan to facilitate strategic economic opportunity for the state.

Please contact Dr Greg Pattinson, Executive Strategic Advisor at the City of Playford on [redacted] or [redacted] or Mrs Sally Jenkin, Team Leader Strategic Urban Planning at the City of Salisbury on [redacted].

Yours faithfully

[redacted]

Sam Green
CEO City of Playford
[redacted]

[redacted]

John Harry
CEO City of Salisbury
[redacted]

13 November 2023

Ms. Tara Hage
Manager Strategy
Infrastructure SA
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**Principal Office**
93 Main Street
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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

Dear Ms. Hage,

**Re: South Australia's next 20-Year State Infrastructure Strategy**

Council appreciates the opportunity to provide a submission with respect to the current consultation on *South Australia's next 20-Year State Infrastructure Strategy Discussion Paper.*

*About Light Regional Council*

Light Regional Council (LRC) has experienced sustained residential growth over a 25-year period through the development of the suburb of Hewett and the expansion of townships including Freeling, Greenock, Wasleys and Kapunda. This growth is projected to continue for the next 10-15 years as the Roseworthy Township Expansion (RTE) is progressively delivered.

Council's population at the 2021 Census was 15,792 persons, and the Roseworthy development is expected to add a projected 10,000 additional persons in population by the time it is fully developed.

Coupled with this, the Council area features strong agricultural grain, livestock and wine industries (including a significant part of the world-renowned Barossa Valley) together with related manufacturing and tourism activities to be both sustained and nurtured to adapt to emerging opportunities.

Council has recently provided a submission to the separate but related Greater Adelaide Regional Plan (GARP) Discussion Paper, in which the State Planning Commission (SPC) has identified there are several challenges to consider in planning for 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.

In its response to the GARP Discussion Paper, amongst other comments, Council noted that achieving further growth effectively and efficiently will require all parts of government collaborating on structure planning for new growth, reflecting this in individual departmental and corporate strategic planning, and then working with the development sector to plan and deliver this when needed.

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.

In terms of the *Consultation Questions*, Council's management team has collated responses to a selection of these for consideration, expressed in the attached Table.

If you would like to discuss or clarify these responses, please contact Council via email at light@light.sa.gov.au or by telephone at 8525 3200.

Yours sincerely,

Richard Dodson
**Chief Executive Officer**

Enc.

| Light Regional Council - Consultation Question Responses | | | |
|---|---|---|---|
| **Section** | **Question number** | **Question** | **Response** |
| 5.1 | 2. | What infrastructure constraints are preventing a more efficient, accessible and productive freight sector? | Issue:<br><br>Existing Identified Freight Route's (Department for Infrastructure and Transport (DIT)'s *A Functional Hierarchy for South Australia's Land Transport*) and locally identified Freight Routes are becoming increasingly affected by light vehicle (personal commuter) traffic. Urban land development adjacent to major freight corridors has resulted in these key roads becoming subject to competing freight/commuter movement priorities and functions. The associated increased traffic volumes, especially at key intersections, are also expected to continue to create larger delays for freight, as appropriate gaps within traffic flows become less frequent. The result of this is an inefficient freight network with compromised safety. |
| | | | Action:<br><br>Future freight links/routes should be planned such that they avoid planned development areas, existing townships, and other areas of alternative land use (tourism etc.). These alternative freight links/residential area bypasses should be consolidated within existing areas and proactively planned for and pursued in growth areas. |
| 5.2 | 3. | How can we enable a sustainable and affordable water supply into the future? | Issue:<br><br>SA Water's Mid-North Area has potable water capacity issues which are a significant current inhibitor, with pressure and flow rate capacity limits |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | being reached across the system. Land division has been limited because of concerns related to the supply of water.<br><br>In addition, ageing infrastructure is also a significant concern. Areas of the pipe network are over 100 years old, with leaks damaging the roads they are under and network interruptions for reactive repairs are commonplace. |
| | | | Action:<br><br>To supply adequate potable water to the Mid-North, for existing populations as well as the urban growth areas, investment in the water systems (potable and consequently wastewater) over the coming years will be required. Proactive planning in this area is required to go hand in hand with the early planning and re-zoning stages of any current or future development region. With a proactive approach to system maintenance, asset management and replacement/upgrade. |
| 6.1 | 7. | How can South Australia better coordinate infrastructure investment to support a growing population? | Issue: Infrastructure investment is required in advance of development or at very least the timing needs to be coordinated with demand.<br><br>Ensuring there is timely provision of infrastructure is critical to support (particularly Greenfield) growth. Communities need to be supported from the beginning and growth should only occur where this is achievable. Both the Greater Adelaide Regional Plan (GARP) and the SA Infrastructure Strategy should include a clear vision for where infrastructure investment will occur. |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | Action:<br><br>The GARP presently under consideration contemplates a 30-year horizon through to 2051. An initial opportunity exists to align the SA Infrastructure Strategy with this.<br><br>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 further.<br><br>However, the capacity of the HIPDU to drive infrastructure investment directions may be limited, emphasising the need for a direction to be determined and a requirement that State infrastructure investment decisions are aligned with this.<br><br>Previously some public-private joint ventures, such as Golden Grove, had legislation (Golden Grove (Indenture Ratification) Act 1984) and a 'whole of government' approach supporting their delivery. A modern equivalent is needed to ensure there is coordination of transport, education, health and emergency services resourcing with new growth areas, either in terms of adding new assets or expanding others.<br><br>This may involve all parts of government and other utilities collaborating on structure planning for new growth and then reflecting this in individual |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | departmental and corporate strategic planning and working with the development sector to deliver this when necessary. |
| 6.3 | 9. | How can we improve public transport services across Adelaide and outer metropolitan areas to encourage greater patronage? | Issue:<br><br>Easily accessible and efficient public transport has long been an issue across metropolitan Adelaide, especially in the north. Land releases further north connect with existing road transport networks however public transport (bus and rail) is limited and/or infrequent. |
| | | | Action:<br><br>Reviewing the transport infrastructure, for commuters or public transport (rail or buses), aligned to population and residential growth is paramount. This includes establishing transport networks before land releases, analysing the current network's capacity to move people efficiently during peak times and connecting buses to major train stations to improve passenger catchment and integration with the broader transport network. For example, the extension of services to the Flinders Hospital/University precinct is a great example of providing options for transportation.<br><br>As rail/ public transport provision is limited in the northern areas of Adelaide, private vehicles are relied upon as the primary mode of transportation. |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | Somewhat bolder options, such as the Government staggering office, business and school hours could facilitate changes to peak movement behaviours enabling a better flow of traffic and more use of public transport. Dedicated bus lanes/ O-Bahn services or rail networks ought to be developed in conjunction with planned land releases to connect people with employment, education and health facilities as well as other services.<br><br>Currently growth in the north is generally led by private land releases, with public transport lagging post-development when transport habits focussed on private vehicle use have become established.<br><br>It would assist the developments if a holistic approach was undertaken for all future needs of the potential development area, including public transport (and health, education, emergency services etc) prior to the developments with land acquired for transport corridors, or roads designed and constructed as necessary, ready for implementation as developments are completed to service the residents. |
| 6.4 | 10. | What investments would support a more efficient and productive health system that meets our growing and changing needs? | Issue:<br><br>The present model of residential growth allows for consultation with key service providers (such as SA Health) at the rezoning stage. However, unless steps are taken to foreshadow new requirements at that time, the |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | provision of medical facilities often depends on private providers becoming established within individual developments.<br><br>If this does not occur, new communities may be created with limited or no established health services close by, with some residents isolated if they have a limited means of being able to access those services. |
| | | | Action:<br><br>A holistic approach is needed to determine appropriate requirements for health facilities and where they need to be located to ensure that accessibility is provided to a range of health facilities. This should take place between local government and state government at an early stage prior to land being developed.<br><br>Structure planning of this nature would enable future needs of the community to be ascertained and particularly those areas where government may have an influence.<br><br>For example, this may enable land to be identified for purposes such as ambulance stations (and other emergency services) in advance of need. This would also ensure the master plan of the site considers access to the proposed land is appropriate, transport networks, and accessibility to those services. |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | Legislation may need to be provided to ensure this process takes place at an early stage, or to ensure appropriate land is set aside within set parameters. Alternatively, land acquisition legislative powers may need to be less restrictive.<br><br>Assessment of the growth needs of a region may involve several government entities to review the proposed growth of a region. |
| 6.5 | 11. | How can infrastructure support improved education and skills outcomes for South Australia? | Issue:<br><br>As per the response to Question 10 – The present model of residential growth allows for consultation with key service providers (such as the Education Department) at the rezoning stage. However, unless steps are taken to foreshadow new requirements at that time, the provision of education facilities often depends on private providers becoming established within individual developments, such as has been seen in the LRC area at the Roseworthy Township Expansion.<br><br>While this provides a market response to demand, there may be other constraints. For example; Xavier College in Gawler Belt is growing, however the transport network surrounding the school is limited with traffic impacting efficient flows during peak times and altering driver behaviour. Public transport does not exist in this area with private buses used to transport school children where necessary. Walking and cycling |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | trails are also limited to provide alternative safe paths to walk or cycle away from the heavily trafficked roads. |
| | | | Action:<br><br>A holistic approach to determine appropriate education facilities, locations and ensure accessibility to education facilities is provided, and to take place between local government and state government at an early stage prior to land being developed.<br><br>Planning for facilities near rail corridors, shared use paths and public transport networks will assist in ensuring opportunities are available for people to develop skills through education.<br><br>Legislation may need to be provided to ensure this process takes place at an early stage, or to ensure appropriate land is set aside within set parameters. Alternatively, land acquisition legislative powers may need to be less restrictive.<br><br>Assessment of the growth needs of a region may involve several government entities to review the proposed growth of a region. |
| 6.6 | 12. | How can we sustainably grow these sectors to realise greater benefits for visitors and residents? | Issue:<br><br>Light Regional Council's *Tourism Plan 2018-2023* recognises that the visitor economy adds some $14.3m to the Council area and a key focus in |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | this Plan is to inspire more people to visit, stay longer, and disperse throughout the region, and ultimately spend more money.<br><br>Action:<br><br>Council's Tourism Plan includes a focus on further activating visitor experiences, including regional and intra-regional, cycling trails; directional and interpretive signage, placemaking supported by high-quality amenities and a high standard of roads connecting tourism experiences and assets.<br><br>Another element to add to this is improving public transport connectivity to regional experiences to enable visitors to readily access these opportunities, such as via day trips from the Adelaide CBD, as an example. |
| 9.1 | 20. | How do we better account for the impacts of climate change in our infrastructure, to support improved resilience? | Issue:<br><br>With growth to the north of Adelaide, concerns emerge regarding the capacity of current emergency service departments. Existing services are generally south of the growth regions or located where easy access to transport networks are not apparent, thus reducing response times.<br><br>These concerns encompass various facets, including the adequacy of overall personnel numbers, the proximity of emergency services to new developments, and the suitability of the infrastructure provided for these crucial entities. This scrutiny extends to key emergency response |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | organisations such as MFS (Metropolitan Fire Service), SES (State Emergency Service), CFS (Country Fire Service), SAPOL (South Australia Police), and SA Ambulance.<br><br>Council recognises the necessity of reassessing these critical components to ensure a robust emergency response framework aligned with the evolving dynamics of both population growth and the changing climate. |
| | | | Action:<br><br>Conducting a comprehensive review of the current emergency services landscape in South Australia is imperative, focusing on the analysis of growth areas and the strategic identification of future Emergency Service hubs. This initiative involves the identification of key parcels of land with strategic value, which can serve as sites for the development of future emergency service facilities. The identified sites should be thoroughly assessed and prepared for future development, aligning with a strategic vision for the evolving needs of emergency response infrastructure.<br><br>This forward-thinking approach not only anticipates the spatial requirements of emergency services but also ensures that these hubs are strategically positioned to effectively cater to the demands of emerging growth areas. By proactively identifying and developing key sites, South Australia can bolster its emergency response capabilities, fostering a |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | resilient and adaptive network capable of addressing both current and future challenges improving the states resilience to natural disasters. |
| 10.1 | 23. | How can government and industry work together to support the supply of skilled labour needed to deliver a transparent infrastructure pipeline? | Issue:<br><br>Access to the required skilled labour becomes more restrictive the more regional the Local Government (LG) is due to several factors that include:<br><br>• Smaller population resulting in smaller resourcing pool.<br><br>• Limited accommodation in regional areas to support relocation of skilled labour.<br><br>This is further complicated by public versus private pay variations. Local government is highly scrutinised by its community regarding employee costs, and it lacks the opportunity to on-charge for wage increases the way that the private sector can without impacting all rate payers. |
| | | | Action:<br><br>To facilitate skilled labour, reintroduction of grant funding for trainees and apprentices that are based in regional areas to grow the talent in the locations that it is needed. It would be prudent to run such a program over a minimum of a five (5) year period to build depth of skilled labour to avoid |

| Light Regional Council - Consultation Question Responses | | | |
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| **Section** | **Question number** | **Question** | **Response** |
| | | | the shortage that is currently being experienced. This would also assist in reducing the current growth in expected wages which is market driven caused by the scarcity of skilled labour.<br><br>Government and industry also need to partner to market the variety of skilled labour careers and where they can lead to increase awareness and promote uptake of trade apprenticeships and/ or traineeships. |

MOUNT BARKER
DISTRICT COUNCIL

Reference: DOC/23/139241

6 November 2023

Attention: Strategy Team
Infrastructure SA
Via email: infrastructure@sa.gov.au

Dear Strategy Team

**RE: SUBMISSION – SOUTH AUSTRALIA'S 20-YEAR STATE INFRASTRUCTURE STRATEGY DISCUSSION PAPER FEEDBACK**

**Introduction**

Thank you for the opportunity to provide a submission on the SA 20-Year State Infrastructure Strategy Discussion Paper.

Mount Barker is the fastest growing Council in South Australia, the 8th fastest in Australia, and is set to become the second largest city in the State within the next ten years.

For the benefit of the team, a response has been provided to each of the 'consultation questions', in table form over pages 2 – 13 of this letter.

To summarise the key points of our submission:

- The submission seeks greater State and federal financial investment for infrastructure planning and delivery, particularly referencing the following projects:
    - Mass Transit from Mount Barker to Metropolitan Adelaide;
    - Northern Freight By-Pass;
    - Hahndorf Township Improvements and Access Upgrade (including the Main Street upgrade);
    - Connector Road (Heysen Boulevard);
    - Wastewater Reuse Infrastructure (Nairne and Hay Valley Stage 2);
    - Mount Barker City Centre Catalyst development.

  Further details on the above projects are contained in attachments at the end of this letter.

- Council would like to offer ISA the opportunity to partner with Council to develop an integrated water management plan for our District.

**Comments on the Discussion Paper**

| Consultation questions | Council comment |
|---|---|
| **Economic context** | |
| What opportunities should we consider to improve South Australia's economic growth? | **1. Productivity Improvement:**<br>a) **Technology adoption:** Encouraging businesses to adopt cutting-edge technologies can enhance productivity. This includes automation, artificial intelligence, and data analytics, which can improve efficiency across various sectors.<br>b) **Skills development:** Invest in workforce training and development to ensure that employees have the necessary skills to be more productive. A well-trained and adaptable workforce can help industries thrive.<br>c) **Infrastructure investment:** Improving transportation infrastructure, such as roads, ports, and rail, can reduce logistics costs and make it easier for businesses to move goods and services. This contributes to increased productivity and economic growth.<br>d) **Regulatory efficiency:** Streamlining regulations and reducing bureaucratic red tape can make it easier for businesses to operate, reducing compliance costs and improving productivity.<br>e) **Research and innovation:** Promote research and development to stimulate innovation. Encouraging collaboration between research institutions and businesses can lead to the development of new products and services, boosting economic growth.<br>**2. Aged care (prepare for forecasted rapid growth in this sector)**<br>a) **Healthcare innovation:** Develop a comprehensive strategy for aged care that |

| Consultation questions | Council comment |
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| | not only focuses on care for the elderly but also promotes healthcare innovation. A regional and metropolitan blueprint would assist this. Supporting startups and established companies in these areas can lead to economic growth. |
| **Enabling infrastructure** | |
| What infrastructure constraints are preventing a more efficient, accessible, and productive freight sector? | **Constraint:**<br>The Adelaide Hills are a natural barrier to heavy freight movement, due to the steep descent/ ascent associated primarily with the Hills Face Zone.<br>Short-term (to 2025)<br>– Additional works to the Hills Freight Bypass targeting road safety and capacity improvements.<br>– Improved public transport services to grow patronage and relieve congestion on the South Eastern Freeway.<br>Medium-term (to 2030)<br>– Silver (significant upgrades) or Gold (greenfield route) standard responses to the current Greater Adelaide Freight Bypass planning study.<br>– Silver standard solutions for metropolitan freight movement along a primary route incorporating Cross Road and a completed North-South Corridor.<br>A heavy vehicle road user charging scheme trial. |
| How can we enable a sustainable and affordable water supply into the future? | The reliance on the River Murray of the Mount Barker district will be increasingly problematic as demand increases and the climate heats. Alternative water supplies are few.<br>Some suggestions for consideration include:<br>– State Government planning policy that changes the requirements for new developments to be more self-sufficient in meeting their water requirements through |

| Consultation questions | Council comment |
|---|---|
| | the provision of onsite rainwater collection, at the house or subdivision level.<br>– Council recently completed a Recycled Water Strategy. This report provides a high-level comparison of potential recycled water scheme options, offering insights into their environmental, economic, and social benefits for the district and presents a preferred option for implementation of the recycled water strategy.<br>– Investment in large, climate independent water supply and storage options in Mount Barker, e.g. recycled water.<br>– Continue to work with SA Water on the Adaptive Water Plan for the Greater Adelaide Region focusing on water security for the next 50 years. Council has been heavily involved in both the Technical Advisory Group and also the stakeholder workshops.<br>– Look to address the forecasted shortfall in available water in the region in the next 50 years by supplying high quality recycled water from the Mount Barker area into Mount Bold Reservoir for indirect potable reuse.<br>– Reductions in the cost of water or making it free for water to meet basic needs and significantly increasing the cost of water above a certain threshold, using the 'large water user pays much more' principle. This will help create a community water conservation ethic and provide incentives for low water use gardens, among other things.<br>– Partner with Mount Barker District Council to develop an integrated water management plan for the district. |

| Consultation questions | Council comment |
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| How do we realise the opportunities and mitigate risks with transforming our transmission and distribution infrastructure for the future? | Due to the rapid development occurring within the District, in relation to distribution planning and mitigation of risk, SAPN and Council should formally meet annually to understand future distribution planning (i.e. to understand SAPNs current, next 12 months and next 10 years forecast projects). Council is aware the existing SAPN substation and infrastructure is nearing capacity and that significant investment is required for a new substation and 66kv line connecting to the existing substation, this has not yet occurred. Identification and securing of the land/easements for the substation and connecting infrastructure must be made much earlier in the development process to avoid this infrastructure being located in inappropriate locations.<br><br>At a transmission level, and again to mitigate risk, Council should formally meet with ElectraNET annually to understand what their future plans for the network in our area are and any development associated with customer / generator connections and their future planning (i.e. next 5 years, 10 years and 20 years). |
| What are the barriers to increased adoption of digital technology to improve productivity? | There has been a clear uptake in useage of digital technology in recent years. The Covid pandemic saw greater flexibility in the workforce and work from home options. Digital technologies allow remote areas to connect without the need for far more expensive hard infrastructure such as roads and rail. Some of the district's townships are constrained in their ability to adopt digital technologies with poor and intermittent telephone and/ or NBN connections despite being geographically fairly close to Mount Barker or other larger centres. |
| What investments could unlock the value of South Australia's resources? | Increase investment in the State's natural resources, their protection and promotion.<br>Significantly increase funding to conservation |

| Consultation questions | Council comment |
|---|---|
| | areas to ensure their protection and resilience against climate impacts and development. Keep wild places wild but invest in infrastructure that will support the visitor economy.<br>Extend natural areas through large-scale revegetation and regeneration, utilising recycled water where available to support this. Support and enable Traditional Owners to undertake land management activities including cultural burning. Incentivise farmers and other land managers to practice regenerative agriculture and manage land for conservation outcomes.<br>Continue to expand on the beneficial reuse of recycled water for the greening of public spaces and revegetation and regeneration projects, in addition to supplying to the agricultural, horticultural and mining industries to enhance and unlock further opportunities throughout the local economy in these spaces. |
| **Liveable and well-planned places** | |
| How can South Australia better coordinate infrastructure investment to support a growing population? | A greater integration between housing supply and infrastructure provision would benefit all and assist in avoiding many of the issues that are experienced in areas experiencing high levels of growth. |
| What can be done to support sufficient, fit-for-purpose housing to improve housing affordability? | 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. The far greater cost of building in greenfield areas is well known and was laid out in the recently issued Greater Adelaide Regional Plan Discussion Paper.<br>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. |
| How can we improve public | Mount Barker has experienced considerable |

| Consultation questions | Council comment |
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| transport services across Adelaide and outer metropolitan areas to encourage greater patronage? | 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 and working within a short commute.<br><br>Council is aware 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. A mass transit solution is needed for the transport corridor that extends along the South Eastern Freeway to accommodate additional growth. On this, Infrastructure South Australia (ISA) could 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. |
| What investments would support a more efficient and productive health system that meets our growing and changing needs? | Effective infrastructure attracts commercial investment by streamlining production processes, reducing costs and improving access to labour and materials (economic-infrastructure-development-strategy.pdf (dfat.gov.au)). |
| How can infrastructure support improved education and skills outcomes for South Australia? | The population of the Adelaide Hills, Fleurieu Peninsula and Kangaroo Island region is growing fast, however access to higher education is limited, resulting in tertiary education attainment levels below the State average.<br><br>Supporting educational opportunities for regional and remote students to develop a locally skilled workforce, retain young people in our communities and drive vibrant local economies is a critical priority for the region.<br><br>A Regional University Cluster, and a Unihub for the 8th fastest growth area in Australia, Mount Barker, would support better tertiary education outcomes.<br><br>In addition, Unicentres and hubs could assist: |

| Consultation questions | Council comment |
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| | a) Research Institutions: South Australia should support and expand its research institutions, including universities, research centres and laboratories. These institutions play a vital role in generating knowledge and innovation. Government and private sector investment in these institutions can lead to groundbreaking research that translates into economic opportunities.<br>b) Collaborative ecosystems: Foster collaboration between research institutions, businesses, and government agencies. Establish innovation ecosystems or technology parks where researchers, co-working centres, entrepreneurs, and businesses can work together to develop and commercialise new technologies. For example, the development of a technology park or innovation hub in collaboration with a local university.<br>Providing the best learning environments allows South Australian students to reach their potential and compete at a higher level. |
| How can we sustainably grow these sectors to realise greater benefits for visitors and residents? | Tourism and hospitality: Further promote South Australia as a tourist destination. Invest in infrastructure, marketing, and events to attract both domestic and international visitors. This includes promoting the State's natural beauty, wineries, and cultural attractions including the Adelaide Hills region, which attracts $225 million of visitor and local spending per year. |
| **Accessible and inclusive infrastructure** | |
| How can we think differently about infrastructure investment to support equitable access and a more inclusive society? | Broad infrastructure provision can increase participation and improve efficiencies. Provision of service-es such as water and sewerage connections will often lead to improved environmental outcomes and allow for a greater level of private investment to foster. |

| Consultation questions | Council comment |
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| What are the opportunities for infrastructure investment to accelerate attainment of the Closing the Gap targets? | As identified above, clean and sanitary conditions lead to improved health outcomes. Other infrastructure investments can increase connectivity and see greater education levels and employment opportunities. Providing fit for use water to support local food production, particularly during periods of drought. In addition economic growth will be stimulated across the broader Mount Barker District through the provision of recycled water to agricultural, horticultural and mining industries. |
| **A decarbonised, sustainable economy** | |
| What infrastructure investments will support industries to transition to a global net zero future? | Fast, efficient, low emissions freight transport options to enable the transition from oil and gas, e.g. renewable fueled electrification or green hydrogen.<br>a) Research and development:<br>Fund research into innovative recycling and waste reduction technologies, such as advanced recycling methods and technologies for handling difficult-to-recycle materials.<br>b) Circular procurement:<br>Encourage government agencies to adopt circular procurement practices, which favour products and services with high sustainability and circularity standards.<br>c) Monitoring and reporting:<br>Establish clear metrics and data collection processes to track progress toward circular economy goals. Regularly report on achievements and challenges.<br>d) Community engagement:<br>Engage with local communities to involve them in circular economy efforts. Encourage grassroots initiatives and community-led projects that promote recycling and reusing.<br>e) Funding and incentives:<br>Provide financial incentives, grants, and subsidies |

| Consultation questions | Council comment |
|---|---|
| | to businesses that invest in circular economy practices and technologies. |
| How do we maintain an affordable, reliable and secure energy system through the energy transition? | Increase the level of large scale battery storage to provide greater security and certainty for residents and all energy users. |
| What are the most significant challenges for decarbonising transport and how do we address them? | Private motor vehicle use and diesel powered freight are the most significant challenges for decarbonising transport. Significant increases in investment on mass transit options and providing greater incentives for people to use mass transit would assist. High frequency, safe and cheap public transport is the only way to discourage private motor vehicle use. Increase active transport options by better planning road infrastructure to prioritise cycling and walking. Increase EV charging infrastructure and provide greater incentives to increase the uptake of electric vehicles. |
| What action is needed to achieve a circular economy in South Australia? | a) Industry clusters:<br>Develop industry clusters where businesses in related fields can collaborate and share resources. For example, if South Australia has a growing renewable energy sector, clustering companies in this industry can lead to synergies, shared supply chains, and increased competitiveness on a global scale. Clustering circular economy industry sectors in a similar fashion, can lead to great outcomes.<br>b) Consumer education:<br>Raise awareness among consumers and small to medium business people about the importance of a circular economy, and provide information on how to reduce waste, recycle, and make sustainable choices.<br>Encourage consumers to purchase products made from recycled materials and support businesses that follow circular principles.<br>c) Investment in infrastructure: |

| Consultation questions | Council comment |
|---|---|
| | Invest in recycling and waste processing infrastructure, including facilities for recycling, composting, and energy recovery.<br>Develop the capacity to recycle a broader range of materials, including e-waste, textiles, and plastics.<br>d) Research and development:<br>Fund research into innovative recycling and waste reduction technologies, such as advanced recycling methods and technologies for handling difficult-to-recycle materials.<br>e) Circular procurement:<br>Encourage government agencies to adopt circular procurement practices, which favour products and services with high sustainability and circularity standards.<br>Council's Community Plan affirms Council's ecological sustainability goals on waste reduction, to lead and support the development of a circular economy through best practice waste minimisation, procurement of recycled and upcycled materials and engagement of systems and programs that significantly increase recycling rates. Infrastructure investment should address this priority objective. |
| What measures can be taken to enable the infrastructure industry to decarbonise? | Council is supportive of the discussion paper's objective to reach a decarbonised and sustainable economy, especially noting its emphasis within regional areas. Supporting electrification is one key element to this. |
| **Improved resilience** | |
| How do we better account for the impacts of climate change in our infrastructure, to support improved resilience? | Council's recycled water scheme provides an important climate independent water supply for non-drinking purposes for the region, improving the liveability of our townships by allowing for the upkeep of recreation areas through irrigation and making them aesthetically pleasing to look at, thus providing spaces to promote positive health |

| Consultation questions | Council comment |
|---|---|
| | and wellbeing for the community. |
| What are the critical resilience issues that South Australia needs to address? | Natural disasters, protection and regeneration of nature and biodiversity, water security for people, agriculture, ecosystems and biodiversity. |
| How can we better realise the resilience benefits of green and blue infrastructure to inform infrastructure planning? | Most developed economies are much further advanced in considering and managing green and blue infrastructure. An example is the lack of consideration of wildlife when developing transport infrastructure. With the proposed upgrades to the South Eastern Freeway, including the upgrade of the Adelaide Road interchange, there is an opportunity to provide much higher level consideration of the needs of native fauna. This could be in the form of wildlife crossing points, landscaping using wildlife friendly species and artificial habitat. These features should be factored into all planning and management of transport infrastructure. |
| **A stronger infrastructure industry** | |
| How can government and industry work together to support the supply of skilled labour needed to deliver a transparent infrastructure pipeline? | Identification on particular skills shortages will enable policy responses to be formulated. As renewable projects increase, so too will the requirement for people with related skills. Consideration needs to be given to all aspects of the pipeline to ensure that costs do not become unmanageable similar to the current situation that has seen construction costs rise significantly at the same time as there is a housing shortage and many building firms have collapsed. |
| How can we maximise the productivity benefits of digitising our infrastructure? | The productivity benefits of digital infrastructure tend to be greatest for small to medium enterprises. Such businesses can be short-lived but with an ability to be nimble and responsive to market developments. The Mount Barker district could particularly benefit from improved and more reliable digital infrastructure to all of its townships. |
| How can government continue to encourage collaboration and | a) Circular procurement:<br>Encourage State and Federal government |

| Consultation questions | Council comment |
|---|---|
| innovation in procurement? | agencies to adopt circular procurement practices, which favour products and services and with high sustainability and circularity standards.<br>b) Further procurement education:<br>Encourage governments to favour local procurement options over interstate and to keep revenue in South Australia. Although this is partially done already, a higher benchmark requirement to "favour excellent local businesses" would greatly assist the economy.<br>In addition, more education, workshops, meet the buyer seminars on entry points for organisations to supply to government would be helpful to achieve the aims above.<br>Government led procurement can assist innovation through a streamlining of processes and transparency in outcomes. There is an efficiency gain in seeking different outcomes from the private sector through an open procurement process. |
| What are the funding and financing options government should consider in future, to ensure its infrastructure program remains affordable and sustainable? | Nontraditional equity crowdfunding, co-operatives and new or underutilised financial instruments would be useful to explore for governments and how they could interact with stakeholders. |

**Conclusion**

We would welcome further input into the development of the strategy should the opportunity arise. Please contact me should you have any further questions on the details below.

Yours sincerely

[redacted]

Marc Voortman

**GENERAL MANAGER – PLANNING AND COMMUNITY**

[redacted]

**Attachment A and B:**
**(A) Mass Transit from Mount Barker to Metropolitan Adelaide**
**(B) Northern Freight By-Pass**

Regional Development Australia
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Page over includes links to:
* Mass Transit from Mount Barker to metropolitan Adelaide
* Northern Freight By-Pass.

# Media Release:

## Public Transport Needs of the Adelaide Hills

1st February 2022

Infrastructure South Australia (ISA) yesterday released the Mount Barker Mass Transit Study which set out key findings and recommendations for options to address passenger transport issues between Adelaide and Mount Barker. Regional Development Australia Adelaide Hills, Fleurieu and Kangaroo Island (RDA AHFKI) support all six recommendations.

Previous studies undertaken in 2019 and 2021 by RDA AHFKI and stakeholders have come to the same conclusion. In the short-term, the fastest and most cost-effective response to improving public transport patronage is to plan and invest in improvements to existing bus services, including;

- More frequent services between the hills and Adelaide
- Investment in additional Park n Ride facilities
- Redesign of local bus services for better connections
- Corridor improvements at key intersections and along Glen Osmond Rd.
- New buses with higher levels of amenity suited to the region's topography and climate
- Bus stop improvements including shelter and access.

For the longer-term, it is agreed that a comprehensive corridor study must be undertaken to identify solutions encompassing all modes of transport.

For now, RDA AHFKI acknowledges the work undertaken, or underway, by the Department for Infrastructure and Transport (DIT) and encourages investment in solutions to improve public transport to grow patronage and reduce congestion for Hills communities.

*Cont'd over…..*

**Chief Executive Officer and Director of Regional Development at RDA Adelaide Hills, Fleurieu and Kangaroo Island, Mr Damien Cooke;**
"Growing congestion on Adelaide Hills transport corridors is gradually eroding quality of life for residents and visitors, and impacting business productivity. Our hills communities experience the challenges every day and are seeking improvements. The ISA report reinforces findings of our own work with stakeholders since 2019 and we look forward to seeing action on these recommendations."

**ISA Mount Barker Mass Transit Study**

ISA Mount Barker Summary Report and Recommendations 2022

**RDA Transport Recommendations for the Adelaide Hills:**

RDA - 2021 Transport Recommendations for the Adelaide Hills

**RDA Adelaide Hills & Fleurieu Peninsula Public Transport Study:**

RDA - 2019 Adelaide Hills and Fleurieu Peninsula Regional Public Transport Study

**Report Contact:**

Damien Cooke
CEO and Director of Regional Development
Regional Development Australia Adelaide Hills, Fleurieu & Kangaroo Island
[redacted]

*END*

# Attachment C: Hahndorf Township Improvements and Access Upgrade (including the Main Street upgrade)

| Category | Criteria | Sub-criteria | Information requested | Response | Date | Contact details for any follow-up required |
|---|---|---|---|---|---|---|
| Project information | Project name | | | Hahndorf Township Improvements and Access Upgrade (including Hahndorf Main Street Upgrade) | | |
| | RDA Region | | | Adelaide Hills, Fleurieu and Kangaroo Island. | | |
| | RDA Key Project Contact/Expert | | | Steve Shotton - RDA Manager | | |
| | Class (feasibility, investment ready, advocacy) | | | Investment ready and advocacy | | |
| | Project description (please limit to a short summary of up to 5 sentences) | | | Verdun Interchange Upgrade, Adelaide Road Bridge Duplication Mt Barker, Mount Barker Road Hahndorf Street Upgrade (Road and Public Realm), Mount Barker Road Bridge Upgrade (Onkaparinga River) / Pioneer Womens Trail | | |
| | Infrastructure type (see Tab 2: 'Infrastructure types' for options) | | | Roads and Place making and green space | | |
| Strategic fit | Alignment with Commonwealth, State and Local policies, strategies and plans | Alignment with the following, or other relevant Local, State or Federal plans/strategies:<br>Commonwealth Government Strategic Objectives<br>Infrastructure Australia Australian Infrastructure Plan 2021<br>Infrastructure Australia's Regional Strengths and Gaps Report 2021<br>South Australia's Strategic Direction 2022-2025<br>South Australia's 20-Year State Infrastructure Strategy<br>South Australia's Capital Intentions Statement 2022<br>South Australia's Strategic Plan<br>30 Year Plans for Regional South Australia<br>South Australia's Integrated Transport and Land Use Plan (ITLUP)<br>Local Government Strategic Plans | Describe how the project meets the goals, objectives or vision of the listed documents or other local, state and/or federal strategies/plans. | The Mount Barker District Council, along with other stakeholders, including Hahndorf Business Tourism Association and Hahndorf Community Association, seek to undertake new works to revitalise the Main Street of Hahndorf, a major tourism destination and economic hub. This project is currently included within the approved scope of works forming the Hahndorf Township Improvements and Access Upgrade led by DIT and specifically aligns with endorsed strategic plans of the Mount Barker District Councils Hahndorf Township Plan (endorsed March 2018) and the Hahndorf Main Street Revitalisation Endorsed Concept Design (November 2020). More broadly all project elements align with the intent of State level strategic plans and strategies. While the main street component is one part of what is a larger overall project Council has principally advocated for improved and safer traffic movement in and around Hahndorf alongside community respresentatives. | | |
| | Downstream project dependencies | Downstream relationship to other projects, i.e.. projects which will rely upon delivery of the proposed project so that they may go ahead. | List dependent projects and describe how the delivery of these projects is dependent on delivery of the proposed project. Where no direct dependencies exist, detail any indirect opportunities for regional development (within the region or cross-regional) which may be unlocked through the proposed project. Conversely, detail whether delivery of this project impede development of other projects or engagement with other regional development opportunities. | The project will result in signifcant economic, social and environmental benefits for the Hahndorf township and the immediate surrounding area. | | |
| | Project need | Depth and rigor of work to define the problem<br>Scale of the problem being addressed (regional and/or cross-regional) | Provide data or other evidence which identifies a service gap or an unmet population need in the region which this project will address. In addition, identify detail on how the project will address this need. | A Federal Government study associated with Hahndorf recommended a series of traffic management and infrastructure improvements. Council has advocated for improved traffic conditions extensively as part of the States Hahndorf Township Improvements and Access Upgrade project. | | |
| Economic impact | Expected employment impacts | Direct and indirect employment impacts, either in development/construction or operation | Provide Input-Output modelling which estimates the total employment changes for SA from the development, construction and operation of the project (standard assumptions) | During and post construction the proposed Hahndorf Traffic Improvements Project would result in an increased of employment. | | |
| | Regional value add | Contribution to GRP<br>Impact on regional output of goods and/or services | Provide input-output analysis which estimates total value add changes for SA from the development, construction and operation of the project (standard assumptions) | The construction of the Hahndorf Traffic Improvements Project in the RDA Adelaide Hills, Fleurieu and Kangaroo Island is estimated to increase GRP by $154,802,098.8m. The effect of the construction of the Hahndorf Traffic Improvements Project in the RDA Adelaide Hills, Fleurieu and Kangaroo Island on the Australian economy (including the RDA Adelaide Hills, Fleurieu and Kangaroo Island) is estimated to be a growth in GDP of $271,553,605.0m. | | |
| | Affordability | Impact on affordability of services or infrastructure use for SA residents, workers and visitors over time | Provide details (cost analysis where available) of the likely impact of delivery of the project on the cost of services in the region. | While currently under review the Federal Government has previously allocated $250 million towards the overall Hahndorf Township Improvements and Access Upgrade. The exact cost of individual project elements is not formally known by Council. | | |
| | Sustainability of resources | Impact on ongoing security of resources for the region, state and/or nation<br>Impact on the risk of resource scarcity | Detail how the project will improve regional, state or national supply chains (this may include skills capabilities). Where relevant, provide data which indicates the ongoing need for the goods and/or services provided, and indicate if there is a current supply chain shortage or challenge in this area. | A Federal Government study associated with Hahndorf recommended a series of traffic management and infrastructure improvements. | | |
| | Regional competitiveness | Impact of the competitiveness of the region, State or nation in a specific sector or supply chain<br>Impact on costs incurred by local businesses and the provision of services | Provide details on how the project would stimulate output in a sector where there is potential for a competitive advantage for the region, state or nation. Where possible, provide evidence which supports this sector as being an area of potential competitive advantage (e.g. industry growth data). In addition or alternatively, detail where costs incurred by local businesses would be impacted by the project. | The town of Hahndorf is located within the Mount Barker District Council and is a major tourist destination in South Australia. It is the oldest surviving German settlement in Australia. The town is an increasingly well-known and popular destination for domestic and international tourists and visitors.<br><br>Two publications, the 'Hahndorf Township Plan (March 2018)' and 'Hahndorf Main Street Revitalisation (August 2020 )' through community consultation have been developed to identify and outline the town's activities. Major improvements within Hahndorf were last well over 20 years ago and the opportunity now exists to maximise economic, tourism and community benefits.<br><br>In 2020, the State and Federal Governments committed $250m ($50m and $200m respectively) to transport and safety infrastructure initiatives in the region. | | |
| Social impact | Liveability, social amenity and improved quality of life | Impact of the project on quality of life for those in the region (and/or the state)<br>Impact on access to social services<br>Contribution to improved community wellbeing and a sense of place | Describe how the project will contribute to improved quality of public spaces, or an improved local services or amenity offering. | 1. New community assets will generate interest and curiosity and a 'must see' situation, increasing visitation.<br>2. Creation of a whole new night–time economy will result in increased sales of 10%.<br>3. Satisfaction and usage by residents, businesses, employees and tourists.<br>4. Business development – increase business for traders.<br>5. Less traffic congestion.<br>6. Provision of improved tourism facilities for the Adelaide Hills businesses.<br>7. Ability for new activities and events to provide a positive community spirit in the Adelaide Hills. | | |

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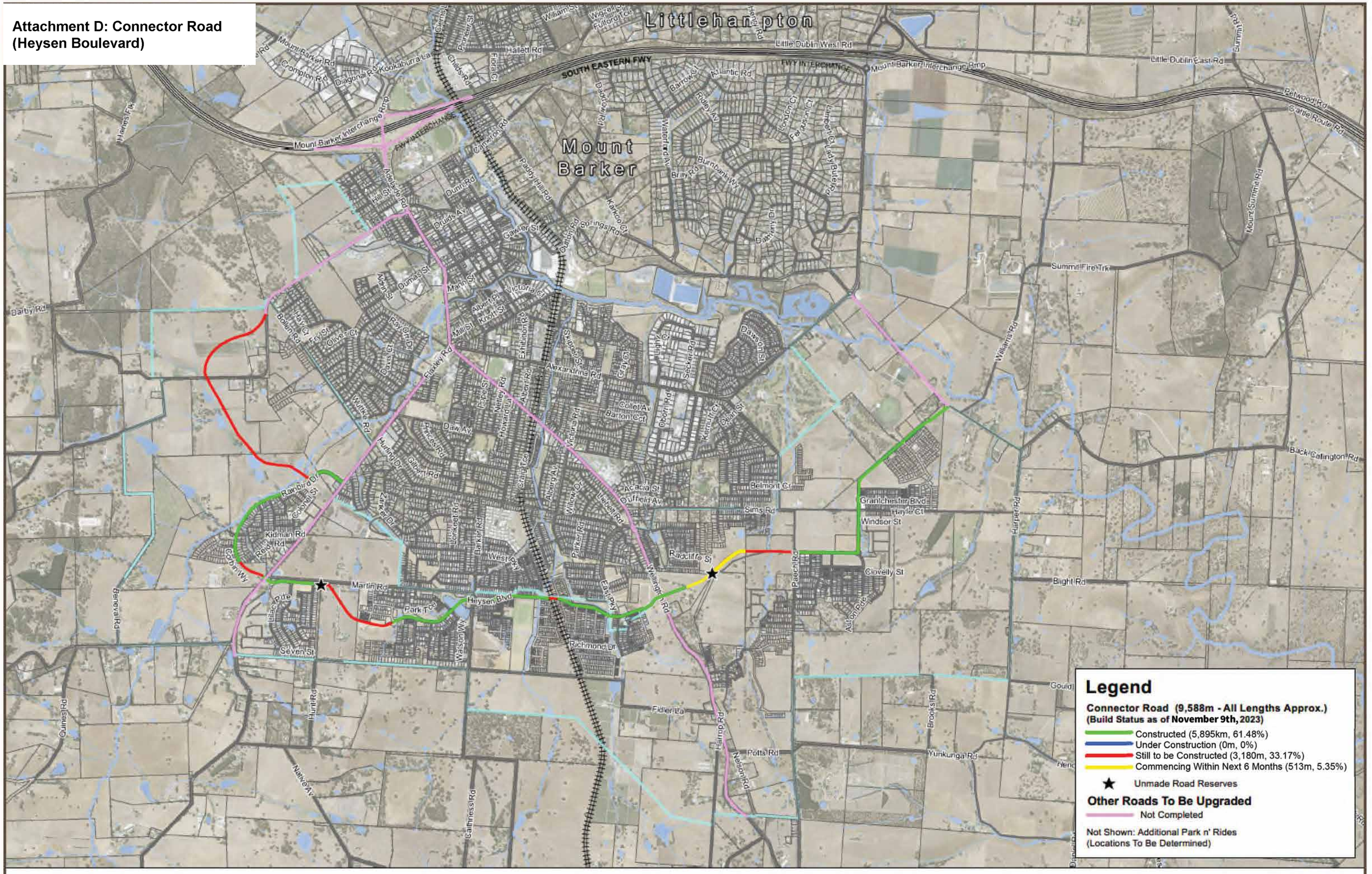
|---|---|---|---|---|---|---|
| | Equitable outcomes and reducing social exclusion, including meeting the infrastructure needs of First Nations communities | Impact on access to or quality of infrastructure or services for otherwise underserviced populations<br>Contribution to community cohesiveness | Detail how the project will provide services or infrastructure in areas of sociodemographic disadvantage, or how the project will meet the need of a specific population group. Provide population data to support the assertion of this need/benefit. | There are significant unquantified outcomes associated with this project that should also be considered.<br><br>This project will contribute significantly to the liveability of the town and region, social connectedness and improved health.<br><br>By increasing community facilities there will be benefits for existing users of the area. In addition, there will be an improved tourism experience through new infrastructure and access. The project contributes significantly to the health and wellbeing of the region. This will also have a flow-on benefits of increasing community awareness and pride for the area. | | |
| | Quality of key services | Contribution to provision of services which impact community and personal health outcomes (direct or indirect)<br>Impact on the capacity, reliability or accessibility of health, education and/or child, aged or other care services | Detail the health services offering to which the project will contribute, or the indirect health and wellbeing benefits which it will enable. Provide population data which indicates that this is needed/beneficial within the context of the local population (i.e. population growth data, demographic profile, historic health profiles/services demand) | The infrastrucutre improvements within and around Hahndorf will provide greater social engagement, providing benefits of social cohesion and connectedness and improvements to community health standards. | | |
| | Community safety | Impact on public and personal safety in the community, region or state<br>Contribution to addressing an outstanding safety concern | Provide detail on how this project will impact safety (this could include improved road safety, safer urban design, reduced crime rates or other safety implications). Where available, you may reference similar projects having improved safety. Where possible/relevant, provide data which demonstrates an existing safety deficit in the region. | As informed by the Federal Government study and its recommendations the overall project will consist of a number of road and public realm infrastructure improvements in and around Hahndorf. Significant safety improvements will result from the cobmined project elements. Council continues to advocate for improved and safer traffic/pedestrian infrastructure within and around Hahndorf as part of the Hahndorf Township Improvements and Access Upgrade. | | |
| Environmental impact | Carbon emissions, including alignment with the targets of the *Climate Change and Greenhouse Emissions Reduction Act 2007* | Contribution to reduction of carbon emissions<br>Contribution to reaching SA's reductions target | Where possible, conduct a Life Cycle Assessment (LCA) to demonstrate the likely carbon emissions of the project. Where possible, provide data to support the findings of this LCA. If an LCA is not possible, describe and estimate the likely Scope 1, 2 and 3 emissions which will result from the project's delivery and ongoing operation. Similarly, provide detail of any external emission reductions which this project will enable, i.e. if this project is delivered, will emissions be reduced overall by replacing existing higher-emitting infrastructure? | n/a | | |
| | Climate change adaptation | Impact on the resilience of infrastructure and/or services against the impacts of climate change, including extreme weather events | Provide detail on how the project will improve (or reduce) mitigate the impacts of climate change, and/or reduce the like hood of or improve the capacity of the community to respond to major climate events. Where possible, provide data on the likely future implications of climate change on the region or project area. | The design advocates for positive impacts to the environment and improvements where possible. | | |
| | Impact on natural assets and/or significant environments | Impact on SA's water, flora, fauna and marine environments<br>Impact on designated areas of heritage or state/national cultural or environmental significance | Provide detail on any areas of environmental, cultural, or heritage significant which the project's construction and/or operation will impact, and detail the likely scope and scale of this impact. | The design advocates for positive impacts to the environment and improvements where possible. | | |
| | Amenity value of the natural environment | Impact on the social, cultural and/or recreational value of the natural environment | Detail how the project will increase the recreational, cultural or other positive offerings of local environments for the community. Where relevant, provide data to demonstrate the need for increased access to or quality of natural environments in the region. | The design advocates for positive impacts to the environment and improvements where possible. | | |
| | Sustainable use of resources and waste reduction | Contribution to waste reduction or creation<br>Contribution to sustainable use/reuse or resources<br>Impact on the levels of pollution (including air, water, noise, or other) on communities | Provide detail on the reduction of waste or pollution (including air, water, noise, or other) that will be enabled by the project. Where possible, provide detail on waste management or reduction initiatives, or sustainable materials initiatives, which have been incorporated into project planning. | Construction initiatives will seek to limit pollution and impact to the environment. | | |
| Deliverability | Project readiness | Level of project readiness (feasibility, investment ready, advocacy)<br>Estimated delivery timeframe for the project | Detail the estimated timelines for project planning, delivery and operation. | Currently the project is nearing completion of the Detailed Design process. As understood by Council once the design has been completed and the funidng confirmed the project elements will be put to tender for either 'Design and Construction' or 'Construction only' in the case of the Main Street Upgrade. Council is hopeful this will begin in 2024. | | |
| | Basis of project cost estimate | Estimated capital cost<br>Estimated ongoing cost<br>Value for Money (costs and benefits) | Provide an estimate project cost (capital and ongoing operation). If this is not yet possible, indicate an estimated range within which the project likely to sit (e.g. <$0.5M, $0.5M-$1M, $1M-$5M, $5M-$10M, $10M-$20M, $20M-$50M, $50M-$100M, $100M-$250M, $250M-$500M, $500M-$750M, $750M-$900M, >$900M) Provide detail on how this cost estimate was developed, with supporting data where possible. | $250000000, it is estimated the main street component of this project has been costed at approximately $35 million. DIT has not provided Council with a detailed cost estimate break down to date. | | |

| | | | | | |
|---|---|---|---|---|---|
| Progress in securing funding arrangements | Funding arrangement or plans, and degree to which this approach has been tested<br>Attractiveness of the project to investors, including state or federal funding or co-investment (public and/or private) | Provide details on the funding arrangements which are currently committed to the project. Where funding is not yet committed, detail the likely funding sources and the work which has been completed to date in confirming the availability of these funds. You may provide references to other similar projects where this funding approach has been successful. Where relevant, note any agreed or potential collaborative funding mechanisms which may support project delivery. | Currently the project elements are proposed to be funded by the $250 million previously allocated by the Federal Government. The Mount Barker District Council has confirmed a funding commitment of $2.7 million towards the Main Street Upgrade element of this proposal. | | |
| Understanding and materiality of the project risks | Project risk assessment and risk mitigation approach | Where completed, provide a project risk assessment. Otherwise, detail the likely risks associated with the project, the level of risk to project delivery (low/medium/high), and any proposed mitigation measures which have or will be undertaken. | Identified high-risk items are;<br>• Final design/construction does not meet community expectations.<br>• Loss of trade and economic impacts of the main street during construction.<br>• Ineffective traffic solution (heavy vehicle management)<br>• Loss of heritage trees and structures and unreasonable impact to State Heritage listed streetscape and character. | | |
| Stakeholder support (and/or engagement) | Stakeholder support for the project (local community/industry/government)<br>Stakeholder engagement to date<br>Planned stakeholder management and/or engagement | Detail work which has been undertaken to date to test or confirm stakeholder support for the project, including government, industry and community stakeholders. Where this has not yet been completed, provide detail of any planned stakeholder engagement exercises for the project. Where concerns have been raised, demonstrate the steps which have been taken to address issues raised. | The project elements have been widely consulted and endorsed by Council. Local stakeholders such as the Hahndorf Business and Tourism Association and the Hahndorf Community Association are supportive of the proposed elements in principle. Council continue to advocate for improved and safer traffic infrastructure for Hahndorf. | | |
| Upstream project dependencies | Upstream dependencies (projects upon which delivery of the proposed project is reliant) | Detail any upstream project dependencies, i.e. is delivery of the proposed project dependent on the completion of another project or program of works? Where this is the case, provide detail on (or links to) the upstream project's planned delivery timeline and current status. | n/a | | |
| Capability and capacity to deliver | Local labour and resource supply chain capacity | Provide data which indicates the level or readiness to deliver the project, including construction and operation. Consider material supply chains and local labour force capacity and capability. Where current capacity does not exist, detail any plans which are in-place (either internally under project planning or externally through government/industry initiatives) which would improve capacity to deliver. | DIT has prepared a Constructability Study for the project. | | |
| Governance | Governance structure for project delivery | Provide mapping and/or a summary of the proposed governance structure for project delivery and indicate the level and type of commitment which has been made by relevant stakeholders to this structure. | Currently the project is proposed to be delivered by the State agency the Department of Infrastrucutre and Transport (DIT) however it is envisaged a robust management and governance process will be implemented to deliver this project | | |

**Attachment D: Connector Road (Heysen Boulevard)**





MOUNT BARKER DISTRICT COUNCIL

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Mount Barker District Council

**Delivery of Connector Road (Heysen Boulevard)**

# Attachment E: Wastewater Reuse Infrastructure (Nairne and Hay Valley Stage two)

| Category | Criteria | Sub-criteria | Information requested | Response | | |
|---|---|---|---|---|---|---|
| | | | | Response | Date | Contact details for any follow-up required |
| Project information | Project name<br><br>RDA Region<br><br>RDA Key Project Contact/Expert<br><br>Class (feasibility, investment ready, advocacy)<br><br>Project description (please limit to a short summary of up to 5 sentences)<br><br>Infrastructure type (see Tab 2: 'Infrastructure types' for options) | | | **Mount Barker Wastewater Reuse Infrastructure - Nairne Hay Valley Stage 2 (In addition to new WWTP (LWRP) and Callington Augmentation Expansion)**<br><br>**Hills, Fleurieu and Kangaroo Island**<br><br>**Damien Cooke**<br><br>**Advocacy**<br><br>**One of the Mount Barker District Council's (the Council) key strategic objectives is to maximise the productive re-use of water through its water recycling program to enable economic development, while also avoiding environmental impacts of disposal to the Mount Barker Creek. The opportunity to increase the supply of recycled water in the broader Mount Barker region has presented itself through:**<br>**• A growing population and wastewater flows following the rezoning of 1,310 ha of land around Mount Barker and Nairne as part of the 2010 Mount Barker Urban Growth Development Plan and growth in other regions**<br>**• Improved environmental conditions and increased regulatory requirements under the Council's Environmental Improvement Program October 2022 (EIP) to South Australia's Environmental Protection Authority (EPA)**<br><br>**Sewerage and Treatment** | **17/10/23 Michael Wundke, Mount Barker District Council, Manager Wastewater Business Development & Client Relations, 0409287180** | |
| Strategic fit | Alignment with Commonwealth, State and Local policies, strategies and plans | Alignment with the following, or other relevant Local, State or Federal plans/strategies:<br>Commonwealth Government Strategic Objectives<br>Infrastructure Australia Australian Infrastructure Plan 2021<br>Infrastructure Australia's Regional Strengths and Gaps Report 2021<br>South Australia's Strategic Direction 2022-2025<br>South Australia's 20-Year State Infrastructure Strategy<br>South Australia's Capital Intentions Statement 2022<br>South Australia's Strategic Plan<br>30 Year Plans for Regional South Australia<br>South Australia's Integrated Transport and Land Use Plan (ITLUP)<br>Local Government Strategic Plans | Describe how the project meets the goals, objectives or vision of the listed documents or other local, state and/or federal strategies/plans. | Mount Barker District Council Wastewater Service is providing wastewater and recycled water services to residents in the district and is committed to an Environmental Improvement Program (EIP October 12, 2021) as agreed with the Environmental Protection Authority (EPA). Under the current EIP Mount Barker District Council is committed to carry out the following key activities;<br>• Compliance action 4 - By 30 June 2023, Mount Barker District Council will have developed a high-level strategy for the development of a sustainable recycled water market to the satisfaction of the EPA; Completed<br>• Compliance action 5 - By 30 June 2023, Mount Barker District Council will be able to demonstrate that an annual budget is in place for the ongoing development of a recycled water market with investment to occur in the 2023/24 financial year; Ongoing<br>• Compliance action 7 – By 30 June 2024, Mount Barker Council will have designed, tendered and commence construction of stage 1 of the Nairne – Hay Valley recycled water scheme (Expected commencement date December 2023)<br><br>The Project aligns with the following sections of the Mount Barker District Council's Strategic Plan, Community Plan or other Council Endorsed Plan;<br><br>• Economic Prosperity Objective 1.1 – promote the district as a smart community which encourages local enterprise and activity that improves lives and ecosystems<br>• Ecological Sustainability Goal 5.1 – Continue to build on Council's reputation as a leader in wastewater management and promote water recycling and reuse.<br>• Ecological Sustainability Goal 3.2 – Plan for and manage health and functional water courses as the spines of the open space network and ecologically functional wildlife corridors.<br>• Community Well Being Goal 4.4 – Provide wastewater treatment services to deliver public health, environmental and economic outcomes and climate change adaptation solutions.<br><br>Alignment with Infrastructure Australia Australian Infrastructure Plan 2021;<br><br>Chapter 6 – Water<br>6.1 – securing our water future<br>6.2 – valuing water to create liveable communities | | |
| | Downstream project dependencies | Downstream relationship to other projects, i.e.. projects which will rely upon delivery of the proposed project so that they may go ahead. | List dependent projects and describe how the delivery of these projects is dependent on delivery of the proposed project. Where no direct dependencies exist, detail any indirect opportunities for regional development (within the region or cross-regional) which may be unlocked through the proposed project. Conversely, detail whether delivery of this project impede development of other projects or engagement with other regional development opportunities. | Stage 1 of the Nairne Hay Valley Recycled Water project construction is due to commence in December 2023 with completion by June 2024. Stage 2 will then tie in to deliver recycled water to customers in the Hay Valley. The stage 2 project is not predicted to impede any other projects. The new Laratinga Water Recovery Plant (LWRP) has no known downstream relationships to other projects. The Callington Expansion project has no known downstream projects to which it relies upon. | | |
| | Project need | Depth and rigor of work to define the problem<br>Scale of the problem being addressed (regional and/or cross-regional) | Provide data or other evidence which identifies a service gap or an unmet population need in the region which this project will address. In addition, identify detail on how the project will address this need. | Chapman Capital Partners delivered a recycled water customer engagement report to Council in March 2022.<br>The report summarises the findings from engagement with major potential customers in the Hay Valley.<br>1. All potential customers interviewed in the Hay Valley region are experiencing water supply and quality issues which are having noticeable impacts on overall agricultural productivity.<br>2. All potential customers interviewed in the Hay Valley region reported increasing weather volatility and extreme weather events as the leading cause for changing behaviours in water usage and an overall increase in water demand through peak irrigating periods.<br>3. All potential customers interviewed in the Hay Valley region reported strong positive brand value associated with their local produce amongst the local community from an environmental (carbon footprint) perspective and from a local employment and economy perspective.<br>4. The ability for potential customers to estimate and quantify the impact of water supply and quality issues is limited. Potential customers have estimated the impact based on crop yield measurements and visual environmental inspections.<br>5. All potential customers interviewed in the Hay Valley region estimate that their demand for recycled water would be in excess of the volumes that have been communicated to the Council in previous customer engagement exercises. Estimates made by customers are largely heuristic based on changing demand patterns discussed in point (2) above.<br>6. All potential customers interviewed in the Hay Valley region have identified inequity in the current water pricing policy as a high barrier to collaborating with Council to jointly explore possible solutions.<br>7. 2 out of 4 potential customers in the Hay Valley region directly attribute lack of water security as the leading reason they are delaying or deferring further investment to grow their businesses.<br>8. All potential customers interviewed in the Hay Valley considered the current water rights pricing regime as a natural hurdle price on a per megalitre basis to consider recycled water from the Council as a viable alternative. Notwithstanding, all potential customers recognise the cost to access recycled water would be in addition to existing water allocations and are willing to incur those costs to offset decreasing productivity arising from low water quality and surety of supply.<br>9. All potential customers interviewed demonstrated a high level of in-principle support for the Draft Pricing Guidelines developed by workshop of industry consultants and experts on the 3 November 2021 ("Draft Pricing Guidelines").<br>10. All potential customers interviewed reported having limited time and resources to conduct detailed analysis of current and expected water usage and on-site infrastructure upgrades. | | |

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| Economic impact | Expected employment impacts | Direct and indirect employment impacts, either in development/construction or operation | Provide Input-Output modelling which estimates the total employment changes for SA from the development, construction and operation of the project (standard assumptions) | Construction 296 FTE. Exact numbers currently unknown for LWRP. Further modelling to be undertaken as projects develop. | | |
| | Regional value add | Contribution to GRP<br>Impact on regional output of goods and/or services | Provide input-output analysis which estimates total value add changes for SA from the development, construction and operation of the project (standard assumptions) | THESE ARE EXTRACTS TAKEN FROM THE RDA ECONOMIC IMPACT MODEL. THESE ARE APPROXIMATES ONLY. The impact on the RDA Adelaide Hills, Fleurieu and Kangaroo Island's GRP as a result of the Nairne Hay Valley Stage 2 Recycled Water is directly equivalent to the change in value added outlined in the section above.<br><br>Construction phase<br>The construction of the Nairne Hay Valley Recycled Water in the RDA Adelaide Hills, Fleurieu and Kangaroo Island is estimated to increase GRP by $22.8m. The effect of the construction of the Nairne Hay Valley Recycled Water in the RDA Adelaide Hills, Fleurieu and Kangaroo Island on the Australian economy (including the RDA Adelaide Hills, Fleurieu and Kangaroo Island) is estimated to be a growth in GDP of $44.0m.<br><br>Operational phase<br>GRP in the RDA Adelaide Hills, Fleurieu and Kangaroo Island is estimated to increase by $28.7m per annum during the operational phase of the project.<br><br>The effect on the Australian economy (including the RDA Adelaide Hills, Fleurieu and Kangaroo Island) is estimated to be a growth in Gross Domestic Product (GDP) of $44.1m per annum during the operational phase of the project.<br><br>Laratinga Water Recovery Plant data has not been confirmed as yet. Expected early 2024.<br><br>The impact on the RDA Adelaide Hills, Fleurieu and Kangaroo Island's GRP as a result of the Callington Expansion is directly equivalent to the change in value added outlined in the section above.<br><br>Construction phase<br>The construction of the Callington Expansion in the RDA Adelaide Hills, Fleurieu and Kangaroo Island is estimated to increase GRP by $16.0m. The effect of the construction of the Callington Expansion in the RDA Adelaide Hills, Fleurieu and Kangaroo Island on the Australian economy (including the RDA Adelaide Hills, Fleurieu and Kangaroo Island) is estimated to be a growth in GDP of $30.8m. | | |
| | Affordability | Impact on affordability of services or infrastructure use for SA residents, workers and visitors over time | Provide details (cost analysis where available) of the likely impact of delivery of the project on the cost of services in the region. | The delivery of these projects is not expected to effect the cost of any services within the region. | | |
| | Sustainability of resources | Impact on ongoing security of resources for the region, state and/or nation<br>Impact on the risk of resource scarcity | Detail how the project will improve regional, state or national supply chains (this may include skills capabilities). Where relevant, provide data which indicates the ongoing need for the goods and/or services provided, and indicate if there is a current supply chain shortage or challenge in this area. | Nairne and Hay Valley Stage 2 recycled water project will play a crucial role in enhancing regional, state, and national supply chains by improving water resource sustainability, ensuring reliable access to water, and contributing to environmental and economic resilience. The ongoing need for these projects lies in the increasing water stress, climate change impacts, and the potential disruptions that water scarcity can cause in various supply chains. Addressing these challenges through this project provides a sustainable and long-term solution that benefits multiple sectors and communities. The current WWTP is undersized for current inflows and is required to maintain public safety and provide a reliable service to the community. There is not expected to be any effect to supply chains in this area from the construction of the new plant. Callington Expansion water project will play a crucial role in enhancing regional, state, and national supply chains by improving water resource sustainability, ensuring reliable access to water, and contributing to environmental and economic resilience. The ongoing need for these projects lies in the increasing water stress, climate change impacts, and the potential disruptions that water scarcity can cause in various supply chains. Addressing these challenges through this project provides a sustainable and long-term solution that benefits multiple sectors. | | |
| | Regional competitiveness | Impact of the competitiveness of the region, State or nation in a specific sector or supply chain<br>Impact on costs incurred by local businesses and the provision of services | Provide details on how the project would stimulate output in a sector where there is potential for a competitive advantage for the region, state or nation. Where possible, provide evidence which supports this sector as being an area of potential competitive advantage (e.g. industry growth data). In addition or alternatively, detail where costs incurred by local businesses would be impacted by the project. | The Nairne and Hay Valley Stage 2 project will aid the primary production industry, providing them a sustainable, alternate source of water for their growing activities. No costs are predicted to be incurred by local businesses with the construction of the new Laratinga Water Recovery Plant. The Callington Expansion project will provide 3 - 4 customers recycled water supply for their commercial growing and industrial proecesses. | | |
| Social impact | Liveability, social amenity and improved quality of life | Impact of the project on quality of life for those in the region (and/or the state)<br>Impact on access to social services<br>Contribution to improved community wellbeing and a sense of place | Describe how the project will contribute to improved quality of public spaces, or an improved local services or amenity offering. | The Nairne and Hay Valley Stage 2 project will continue to contribute to urban greening and cooling of the Nairne and Hay Valley area. The new Laratinga Water Recovery Plant project will improve a critical essential service for the wider community. The Callington expansion will look to provide recycled water to 3 - 4 customers within the Callington district for their industry and primary production activities. | | |
| | Equitable outcomes and reducing social exclusion, including meeting the infrastructure needs of First Nations communities | Impact on access to or quality of infrastructure or services for otherwise underserviced populations<br>Contribution to community cohesiveness | Detail how the project will provide services or infrastructure in areas of sociodemographic disadvantage, or how the project will meet the need of a specific population group. Provide population data to support the assertion of this need/benefit. | Improved Access to Alternate Water: This project will provide reliable access to alternate water in an area that is experiencing poor groundwater quality. This can benefit disadvantaged communities with limited access to appropriate water.<br>Environmental Benefits: Using recycled water for irrigation will help maintain green spaces, parks, and community gardens. This, in turn, can contribute to improved mental and physical health for the residents of those areas.<br>Job Opportunities: The construction and maintenance of Nairne and Hay Valley projects will create job opportunities, which can be beneficial for the local district and economy.<br>Infrastructure Development: The project will involve the construction of infrastructure such as pipelines, distribution systems and recycled water storage. This infrastructure can serve as the basis for future community development and expansion, improving living conditions.<br>Sustainable Development: By utilising recycled water, the project can contribute to the sustainability of the region, providing long-term benefits for the community, especially those who are most vulnerable to environmental changes.<br>Education and Training: The project may include educational and training programs to involve the community in its operation and maintenance, potentially offering skills and employment opportunities to local residents. The new Laratinga Water Recovery Plant project will improve a critical essential service for the wider community. The Callington expansion project will provide improved access to alternate water: This project will provide reliable access to alternate water in an area that is experiencing poor groundwater quality and limited annual rainfall. | | |

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| | Quality of key services | Contribution to provision of services which impact community and personal health outcomes (direct or indirect)<br>Impact on the capacity, reliability or accessibility of health, education and/or child, aged or other care services | Detail the health services offering to which the project will contribute, or the indirect health and wellbeing benefits which it will enable. Provide population data which indicates that this is needed/beneficial within the context of the local population (i.e. population growth data, demographic profile, historic health profiles/services demand). | Details of health and wellbeing benefits that each of these projects will enable:<br><br>Public Health and Disease Prevention:<br>Wastewater and Recycled water projects involve advanced treatment processes that remove contaminants and pathogens from wastewater. This contributes to a decrease in the spread of waterborne diseases, benefiting overall public health. In turn, this can lead to reduced healthcare costs associated with treating water-related illnesses.<br><br>Reduced Strain on Natural Water Sources:<br>By recycling and reusing water, the Nairne and Hay Valley and Callington expansion projects will reduce the demand on natural water sources such as rivers and aquifers. This will help prevent over-extraction from bores and rivers and protect ecosystems, indirectly contributing to the health of the environment and the communities that rely on these ecosystems for sustenance and recreation.<br><br>Environmental Health and Biodiversity:<br>All projects will include ecological considerations to help maintain and restore local ecosystems. Healthy ecosystems provide essential services, such as clean air, water purification, and habitat for wildlife, which will indirectly benefit the physical and mental health of local residents.<br><br>Community Health and Wellbeing Programs: | | |
| | Community safety | Impact on public and personal safety in the community, region or state<br>Contribution to addressing an outstanding safety concern | Provide detail on how this project will impact safety (this could include improved road safety, safer urban design, reduced crime rates or other safety implications). Where available, you may reference similar projects having improved safety. Where possible/relevant, provide data which demonstrates an existing safety deficit in the region. | Nairne and Hay Valley Stage 2 project will supply recycled water to a high risk bushfire area which in a catastrophic emergency can be used for firefighting. The new LWRP in conjunction with other major projects within the district will enhance the catchment area to ensure safe transport of sewer to the new treatment plant. The Callington expansion project will supply recycled water to a high risk bushfire area which in a catastrophic emergency can be used for firefighting. | | |
| Environmental impact | Carbon emissions, including alignment with the targets of the *Climate Change and Greenhouse Emissions Reduction Act 2007* | Contribution to reduction of carbon emissions<br>Contribution to reaching SA's reductions target | Where possible, conduct a Life Cycle Assessment (LCA) to demonstrate the likely carbon emissions of the project. Where possible, provide data to support the findings of this LCA. If an LCA is not possible, describe and estimate the likely Scope 1, 2 and 3 emissions which will result from the project's delivery and ongoing operation. Similarly, provide detail of any external emission reductions which this project will enable, i.e. if this project is delivered, will emissions be reduced overall by replacing existing higher-emitting infrastructure? | Life Cycle Assessment has not been done on any of the projects to date. The new LWRP is in the early contractor involvement stage and data for this is not currently available at this time. | | |
| | Climate change adaptation | Impact on the resilience of infrastructure and/or services against the impacts of climate change, including extreme weather events | Provide detail on how the project will improve (or reduce) mitigate the impacts of climate change, and/or reduce the like hood of or improve the capacity of the community to respond to major climate events. Where possible, provide data on the likely future implications of climate change on the region or project area. | 1. Water Conservation: This project will help conserve groundwater resources in the region by treating and reusing wastewater for non-potable purposes like irrigation and industrial processes. This reduces the demand for water from natural sources.<br>2. Reduced Energy Consumption: Using recycled water locally will reduce energy demand, resulting in lower greenhouse gas emissions.<br>3. Drought Resilience: In areas facing more frequent and severe droughts due to climate change, recycled water provides a reliable alternative source for non-potable water needs, which will help maintain essential services and activities during water shortages.<br>4. Climate Adaptation: Recycling water for agricultural purposes assists the local agriculture sector adapt to changing climate conditions, ensuring a more stable food supply.<br>5. Community Resilience: This project will contribute to the overall resilience of the community by reducing its vulnerability to water scarcity and other climate-related challenges. | | |
| | Impact on natural assets and/or significant environments | Impact on SA's water, flora, fauna and marine environments<br>Impact on designated areas of heritage or state/national cultural or environmental significance | Provide detail on any areas of environmental, cultural, or heritage significant which the project's construction and/or operation will impact, and detail the likely scope and scale of this impact. | This project is expected to have a positive impact on the environment by reusing treated wastewater and reducing discharge to the Mount Barker Creek therefore reducing impact to this ecosystem. There are no known designated areas of heritage or cultural significance that will be affected during construction or upon completion of the new LWRP and Nairne and Hay Valley and Callington expansion projects. | | |
| | Amenity value of the natural environment | Impact on the social, cultural and/or recreational value of the natural environment | Detail how the project will increase the recreational, cultural or other positive offerings of local environments for the community. Where relevant, provide data to demonstrate the need for increased access to or quality of natural environments in the region. | The Nairne and Hay Valley project will provide a sustainable alternate water source to residents and customers in the Hay Valley. Upon the commissioning of the new LWRP, the Laratinga wetlands will no longer be required as part of the wastewater treatment process. Healthy wetlands support a diverse array of plant and animal species. They serve as critical habitats for many wildlife species, including migratory birds, amphibians, fish, and numerous invertebrates. Wetlands help conserve and protect biodiversity. The Callington expansion will provide a alternate water source to an area with depleting ground water stocks and a below average annual rainfall. | | |
| | Sustainable use of resources and waste reduction | Contribution to waste reduction or creation<br>Contribution to sustainable use/reuse or resources<br>Impact on the levels of pollution (including air, water, noise, or other) on communities | Provide detail on the reduction of waste or pollution (including air, water, noise, or other) that will be enabled by the project. Where possible, provide detail on waste management or reduction initiatives, or sustainable materials initiatives, which have been incorporated into project planning. | The projects will promote circular economy opportunities by supplying recycled water to customers for productive reuse. | | |
| Deliverability | Project readiness | Level of project readiness (feasibility, investment ready, advocacy)<br>Estimated delivery timeframe for the project | Detail the estimated timelines for project planning, delivery and operation. | Nairne and Hay Valley will commence at the conclusion of the Stage 1 Nairne and Hay Valley project in June 2024 or soon thereafter. Dual ECI for the new LWRP is currently underway. Expected contract award date end 2023 / start 2024. Callington expansion project proposed commencement would be after the completion of the Nairne and Hay Valley Stage 2 project. | | |
| | Basis of project cost estimate | Estimated capital cost<br>Estimated ongoing cost<br>Value for Money (costs and benefits) | Provide an estimate project cost (capital and ongoing operation). If this is not yet possible, indicate an estimated range within which the project likely to sit (e.g. <$0.5M, $0.5M-$1M, $1M-$5M, $5M-$10M, $10M-$20M, $20M-$50M, $50M-$100M, $100M-$250M, $250M-$500M, $500M-$750M, $750M-$900M, >$900M) Provide detail on how this cost estimate was developed, with supporting data where possible. | Nairne and Hay Valley Stage 2 - $20-50M. Please see attached business case carried out by KBR Nov 22 for total project cost estimates and assumptions **DOC/23/42029**. New LWRP Approx $50M-$100M. Callington expansion approx $20M-$50M. | | |
| | Progress in securing funding arrangements | Funding arrangement or plans, and degree to which this approach has been tested<br>Attractiveness of the project to investors, including state or federal funding or co-investment (public and/or private) | Provide details on the funding arrangements which are currently committed to the project. Where funding is not yet committed, detail the likely funding sources and the work which has been completed to date in confirming the availability of these funds. You may provide references to other similar projects where this funding approach has been successful. Where relevant, note any agreed or potential collaborative funding mechanisms which may support project delivery. | There has been interest from the private sector recently about developing a public/private partnership in relation to council's recycled water. One party is currently working on a unsolicited proposal to submit to council. Council expects to receive this prior to end of year 2023 to then make an informed decision on a way forward. Ongoing | | |

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| | Understanding and materiality of the project risks | Project risk assessment and risk mitigation approach | Where completed, provide a project risk assessment. Otherwise, detail the likely risks associated with the project, the level of risk to project delivery (low/medium/high), and any proposed mitigation measures which have or will be undertaken. | Community & property owner consultation<br>Property easements – owner agreement / appetite<br>Capacity of external resources – e.g. engineering consultancies | | |
| | Stakeholder support (and/or engagement) | Stakeholder support for the project (local community/industry/government)<br>Stakeholder engagement to date<br>Planned stakeholder management and/or engagement | Detail work which has been undertaken to date to test or confirm stakeholder support for the project, including government, industry and community stakeholders. Where this has not yet been completed, provide detail of any planned stakeholder engagement exercises for the project. Where concerns have been raised, demonstrate the steps which have been taken to address issues raised. | Please refer to the Chapman Capital Partners - Recycled Water Customer Engagement Report 15 March 2022 **DOC/22/41136** relating to Nairne and Hay Valley and Callington projects | | |
| | Upstream project dependencies | Upstream dependencies (projects upon which delivery of the proposed project is reliant) | Detail any upstream project dependencies, i.e. is delivery of the proposed project dependent on the completion of another project or program of works? Where this is the case, provide detail on (or links to) the upstream project's planned delivery timeline and current status. | Yes. This project will be stage 2 of an extension of the stage 1 project to be completed in June 2024. Please see attached business case carried out by KBR Nov 22 for total project cost estimates and assumptions **DOC/23/42029.** No other upstream projects are expected to hinder either the LWRP or the Nairne and Hay Valley projects. | | |
| | Capability and capacity to deliver | Local labour and resource supply chain capacity | Provide data which indicates the level or readiness to deliver the project, including construction and operation. Consider material supply chains and local labour force capacity and capability. Where current capacity does not exist, detail any plans which are in-place (either internally under project planning or externally through government/industry initiatives) which would improve capacity to deliver. | Please refer to attached Nairne and Hay Valley Stage 2 Project Concept Proposal **DOC/23/2433.** LWRP to commence in 2024. Callington expansion to commence after the completion of Stage 2 Nairne and Hay Valley. | | |
| | Governance | Governance structure for project delivery | Provide mapping and/or a summary of the proposed governance structure for project delivery and indicate the level and type of commitment which has been made by relevant stakeholders to this structure. | Please refer to attached Nairne and Hay Valley Stage 2 Project Concept Proposal DOC/23/2433. LWRP to commence in 2024. Governance structure to be decided on the Callington expansion during prelimanary project discussion. | | |

# Attachment F: Mount Barker City Centre Catalyst development

| Category | Criteria | Sub-criteria | Information requested | Response | Date | Contact details for any follow-up required |
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| Project information | Project name | | | **Mount Barker City Centre Project** | | s |
| | RDA Region | | | **Adelaide Hills Fleurieu and Kangaroo Island** | | |
| | RDA Key Project Contact/Expert | | | **Damien Cooke** | | |
| | Class (feasibility, investment ready, advocacy) | | | **Feasibility or Investment Ready** | | |
| | Project description (please limit to a short summary of up to 5 sentences) | | | **The City Centre Project is a $120million project that incorporates a blend of public and private investment delivering a city-shaping catalyst initiative that will embed Mount Barker as the CBD of the Adelaide Hills.**<br><br>**The project incorporates Council's Civic Office, Town Square, Co-working Hub, Community Hub, Stage 2 Regional University Centre, Commercial Office (Community Living Australia), Retail/Hospitality and Short Term Accommodation.**<br><br>**This project will deliver 400 new jobs into the Mount Barker CBD, supporting workers to work locally all supported by an activated public realm, new retail offerings, community meeting and event spaces, all connected to the surrounding city centre.** | | |
| | Infrastructure type (see Tab 2: 'Infrastructure types' for options) | | | **Social and Community Infrastructure** | | |
| Strategic fit | Alignment with Commonwealth, State and Local policies, strategies and plans | Alignment with the following, or other relevant Local, State or Federal plans/strategies:<br>Commonwealth Government Strategic Objectives<br>Infrastructure Australia Australian Infrastructure Plan 2021<br>Infrastructure Australia's Regional Strengths and Gaps Report 2021<br>South Australia's Strategic Direction 2022-2025<br>South Australia's 20-Year State Infrastructure Strategy<br>South Australia's Capital Intentions Statement 2022<br>South Australia's Strategic Plan<br>30 Year Plans for Regional South Australia<br>South Australia's Integrated Transport and Land Use Plan (ITLUP)<br>Local Government Strategic Plans | Describe how the project meets the goals, objectives or vision of the listed documents or other local, state and/or federal strategies/plans. | The City Centre Project has direct alignment with Council and the RDA Economic Development priorities. Creating local employment through supporting the health, education and public sectors in an end value $120million public/private city-shaping project. It reinforces Mount Barker's role as a regional centre within the 30 Year Plan Regional Plan and supports the State's agenda in creating a competitive business environment, favouring local industry involvement and providing a pipeline of construction projects to boost investor confidence.<br><br>In addition to the economic alignment, it will also provide for opportunities to address areas of need within our youth and disability sector as a result of the the significant community facility proposed and positioning of Community Living Australia as a key tenant within the project. | | |
| | Downstream project dependencies | Downstream relationship to other projects, i.e.. projects which will rely upon delivery of the proposed project so that they may go ahead. | List dependent projects and describe how the delivery of these projects is dependent on delivery of the proposed project. Where no direct dependencies exist, detail any indirect opportunities for regional development (within the region or cross-regional) which may be unlocked through the proposed project. Conversely, detail whether delivery of this project impede development of other projects or engagement with other regional development opportunities. | Council's commitment to this project, will directly unlock over $50million of private sector investment on this site. More broadly, this project is likely to stimulate further retail, hospitality and commercial development within the Mount Barker CBD as it accommodates the state's fastest growing residential sector. | | |
| | Project need | Depth and rigor of work to define the problem<br>Scale of the problem being addressed (regional and/or cross-regional) | Provide data or other evidence which identifies a service gap or an unmet population need in the region which this project will address. In addition, identify detail on how the project will address this need. | Over 4,500 new jobs are required to service the forecasted population growth in Mount Barker. The Mount Barker CBD represents the most feasible location to accommodate a density of employment, as supported by zoning that allows for development up to 4-5 stories in height. The need to provide additional community facilities is also accommodated within this project with the inclusion of youth, library, meeting and co-working spaces. Detailed community infrastructure planning has identified the demand and substantiated the need. | | |
| Economic impact | Expected employment impacts | Direct and indirect employment impacts, either in development/construction or operation | Provide Input-Output modelling which estimates the total employment changes for SA from the development, construction and operation of the project (standard assumptions) | The combination of all direct, industrial and consumption effects of the construction phase of the City Centre Project - Town Square, Car Parking, knowledge centre, co work (estimated $120 million of development) is estimated to support 311 jobs during construction.<br><br>It is estimated that of the 311 jobs created, 263 or 84.6% would be expected to be filled by Adelaide Hills residents. Post construction, the project will support over 400 employees from the site, signalling the greatest concentration of employment within the Mount Barker CBD | | |
| | Regional value add | Contribution to GRP<br>Impact on regional output of goods and/or services | Provide input-output analysis which estimates total value add changes for SA from the development, construction and operation of the project (standard assumptions) | The construction of the City Centre Catalyst Project is estimated to increase GRP by $68.4m. The effect of the construction of the City Centre Project on the Australian economy is estimated to be a growth in GDP of $131.9m. | | |
| | Affordability | Impact on affordability of services or infrastructure use for SA residents, workers and visitors over time | Provide details (cost analysis where available) of the likely impact of delivery of the project on the cost of services in the region. | This project will enable the delivery of efficient Civic and Community services from the site, highlighted by the inclusion of Community Living Australia as a key development partner/primary tenant of the project. Community Living Australia is bringing their head office to Mount Barker and is a leading community health, support and NDIS provider.<br><br>Through this new location and model, Community Living Australia, (brought to the site through Council's commitment to the project), will be aiming to address the $27milllion of unspent NDIS funding within the Adelaide Hills Region, thereby providing greater accessibility to the support services on offer. Council's location on the site, is evidence of its commitment to ensure its customer service delivery is best-practice and enables its services to community to be delivered as effectively as possible. | | |
| | Sustainability of resources | Impact on ongoing security of resources for the region, state and/or nation<br>Impact on the risk of resource scarcity | Detail how the project will improve regional, state or national supply chains (this may include skills capabilities). Where relevant, provide data which indicates the ongoing need for the goods and/or services provided, and indicate if there is a current supply chain shortage or challenge in this area. | This projects role in catalysing significant development within Mount Baker's CBD, will greatly assist in positioning. The potential inclusion of planned Regional University Centre within the project is also a critical part of supporting educational opportunities for regional and remote students to develop a locally skilled workforce, retain young people in our communities, and drive vibrant local economies, is a critical priority for the region | | |

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| | Regional competitiveness | Impact of the competitiveness of the region, State or nation in a specific sector or supply chain<br>Impact on costs incurred by local businesses and the provision of services | Provide details on how the project would stimulate output in a sector where there is potential for a competitive advantage for the region, state or nation. Where possible, provide evidence which supports this sector as being an area of potential competitive advantage (e.g. industry growth data). In addition or alternatively, detail where costs incurred by local businesses would be impacted by the project. | | | |
| Social impact | Liveability, social amenity and improved quality of life | Impact of the project on quality of life for those in the region (and/or the state)<br>Impact on access to social services<br>Contribution to improved community wellbeing and a sense of place | Describe how the project will contribute to improved quality of public spaces, or an improved local services or amenity offering. | This public infrastructure, in particular town square and community facilities will address a current shortfall in these offerings and cater for the current and anticipated population growth coming into Mount Barker.<br><br>In addition to the stated ongoing benefits, the Town Square supported by community amenities, car parking, retail and food & beverage outlets will allow for activation of an events calendar not otherwise possible. A curated series of events will see on average 3 community led events per week attracting an estimated 700 people, and 10 major events of regional standing yearly. This annual calendar of events will generate a further economic impact of $8.12m, and support 46 local jobs. | | |
| | Equitable outcomes and reducing social exclusion, including meeting the infrastructure needs of First Nations communities | Impact on access to or quality of infrastructure or services for otherwise underserviced populations<br>Contribution to community cohesiveness | Detail how the project will provide services or infrastructure in areas of sociodemographic disadvantage, or how the project will meet the need of a specific population group. Provide population data to support the assertion of this need/benefit. | A central hub of community, civic, and health support will provide visible and equitable access to these valuable services to the Adelaide Hills Region. Of particular focus will be our communities youth and disabled sectors who although have high needs are often forgotten or underserviced. Both of these groups feature highly within Council's Community Plan, Healthy Ageing & Access Plan and Regional Public Health Plan. | | |
| | Quality of key services | Contribution to provision of services which impact community and personal health outcomes (direct or indirect)<br>Impact on the capacity, reliability or accessibility of health, education and/or child, aged or other care services | Detail the health services offering to which the project will contribute, or the indirect health and wellbeing benefits which it will enable. Provide population data which indicates that this is needed/beneficial within the context of the local population (i.e. population growth data, demographic profile, historic health profiles/services demand). | Community Living Australia is a key partner to the overall project and is attracted off the back of Council's commitment to locate a significant civic presence on the site. Their presence provides the unique opportunity to ensure our people with disabilities are provided with an opportunity to be visible to our broader community, located within a precinct that will be a melting pot of our broader Region. With a lack of appropriate services for people with disabilities, this project will help address this issue and ensure more of our community are able to stay in region and have their needs met without needing to relocate to Adelaide. This approach aligns with Council's intent to implement the strategic development of key economic/employment hubs such as the health precinct and Mount Barker CBD – with the agglomeration of businesses and jobs in these areas generating spill over impacts and make a stronger case for additional infrastructure investments. | | |
| | Community safety | Impact on public and personal safety in the community, region or state<br>Contribution to addressing an outstanding safety concern | Provide detail on how this project will impact safety (this could include improved road safety, safer urban design, reduced crime rates or other safety implications). Where available, you may reference similar projects having improved safety. Where possible/relevant, provide data which demonstrates an existing safety deficit in the region. | As by-product of broader economic and social factors, there is an increasing co-hort of disaffected youth that this project can speak to. With the devleopment of a new, activated town square, youth, co-working and other associated retail and hospitality uses, this project will provide a natural meeting point and opportunity for connection into the community. Council has already engaged with the youth sector and is working across Local, State and Federal Government to see this project provide tangible benefits to this critical segment of our community. | | |
| Environmental impact | Carbon emissions, including alignment with the targets of the *Climate Change and Greenhouse Emissions Reduction Act 2007* | Contribution to reduction of carbon emissions<br>Contribution to reaching SA's reductions target | Where possible, conduct a Life Cycle Assessment (LCA) to demonstrate the likely carbon emissions of the project. Where possible, provide data to support the findings of this LCA. If an LCA is not possible, describe and estimate the likely Scope 1, 2 and 3 emissions which will result from the project's delivery and ongoing operation. Similarly, provide detail of any external emission reductions which this project will enable, i.e. if this project is delivered, will emissions be reduced overall by replacing existing higher-emitting infrastructure? | Over 60% of our working population leaves our District every day to go to work, the carbon impact of this is significant. This project, by attracting over 400 employees to the Mount Barker CBD, is designed to set a clear, replicable precedent for local employment options. These local options are essential to demonstrating the potential for Mount Barker to provide the critical mass of local employment that sees it break its reliance on Adelaide and places downward pressure on the extent of commuter traffic and as a result, carbon emissions. | | |
| | Climate change adaptation | Impact on the resilience of infrastructure and/or services against the impacts of climate change, including extreme weather events | Provide detail on how the project will improve (or reduce) mitigate the impacts of climate change, and/or reduce the like hood of or improve the capacity of the community to respond to major climate events. Where possible, provide data on the likely future implications of climate change on the region or project area. | Our local community has been impacted by catastrophic bushfires in recent years, which has increased the priority of ensuring local resilience and limiting the extent to which our community needs to travel through high-risk bush fire areas. The primary response to this is to increase local employment, which limits the commuter traffic on the congested South-Easter Freeway. Furthermore, by developing within the heart of the Mount Barker CBD, the working population (Council staff included) have much greater access (compared to current) to access active and public transport options. | | |
| | Impact on natural assets and/or significant environments | Impact on SA's water, flora, fauna and marine environments<br>Impact on designated areas of heritage or state/national cultural or environmental significance | Provide detail on any areas of environmental, cultural, or heritage significant which the project's construction and/or operation will impact, and detail the likely scope and scale of this impact. | Our local Permangk First Australian's represent a tangible link to both the history and future of our Region. We have commenced our engagement with this community about how to reflect their stories and culture in this project. The inclusion of a co-working hub and regional university centre provides opportunity to continue our engagement with our First Australian's community and to translate this to tangible employment and economic outcomes. The commitment to this outcome has already begun through Council's First Nations Business Network, which will be involved in the scoping and delivery of this project. | | |
| | Amenity value of the natural environment | Impact on the social, cultural and/or recreational value of the natural environment | Detail how the project will increase the recreational, cultural or other positive offerings of local environments for the community. Where relevant, provide data to demonstrate the need for increased access to or quality of natural environments in the region. | As a building within the heart of an urban city centre, there is limited direct impact on the natural environment. | | |
| | Sustainable use of resources and waste reduction | Contribution to waste reduction or creation<br>Contribution to sustainable use/reuse or resources<br>Impact on the levels of pollution (including air, water, noise, or other) on communities | Provide detail on the reduction of waste or pollution (including air, water, noise, or other) that will be enabled by the project. Where possible, provide detail on waste management or reduction initiatives, or sustainable materials initiatives, which have been incorporated into project planning. | A whole of site approach to waste minimisation will be undertaken as part of delivering a best-practice approach to long-term, viable waste intervention. | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| Deliverability | Project readiness | Level of project readiness (feasibility, investment ready, advocacy)<br>Estimated delivery timeframe for the project | Detail the estimated timelines for project planning, delivery and operation. | The construction of the project is planned to commence in Jan 2025 (town square) and will then flow into an integrated delivery program, incorporating the Civic Office, Community Living Australia Head Office, Retail/Hospitality, Serviced Apartments and significant Community Hub facility. All elements are planned to be delivered by the conclusion of 2027. | | |
| | Basis of project cost estimate | Estimated capital cost<br>Estimated ongoing cost<br>Value for Money (costs and benefits) | Provide an estimate project cost (capital and ongoing operation). If this is not yet possible, indicate an estimated range within which the project likely to sit (e.g. <$0.5M, $0.5M-$1M, $1M-$5M, $5M-$10M, $10M-$20M, $20M-$50M, $50M-$100M, $100M-$250M, $250M-$500M, $500M-$750M, $750M-$900M, >$900M) Provide detail on how this cost estimate was developed, with supporting data where possible. | Whole of project construction costs are approximately $120million. Council's financial commitment is forecasted at approximately $60million. These costs are taken from the concept design cost estimate that has been developed for this project and includes contractor input. | | |
| | Progress in securing funding arrangements | Funding arrangement or plans, and degree to which this approach has been tested<br>Attractiveness of the project to investors, including state or federal funding or co-investment (public and/or private) | Provide details on the funding arrangements which are currently committed to the project. Where funding is not yet committed, detail the likely funding sources and the work which has been completed to date in confirming the availability of these funds. You may provide references to other similar projects where this funding approach has been successful. Where relevant, note any agreed or potential collaborative funding mechanisms which may support project delivery. | Council's Long Term Financial Plan has provisioned for its expenditure relating to this project and the private sector funding is also secured through appropriate Finance and is ready to unlock and deliver the project. Grant funding is a key but not the only avenue to delivering this project, with the majority of it delivered through private sector led or public/private mechanisms, representing an innovative delivery model and one that ensures long-term financial sustainabilty for Council/Community. | | |
| | Understanding and materiality of the project risks | Project risk assessment and risk mitigation approach | Where completed, provide a project risk assessment. Otherwise, detail the likely risks associated with the project, the level of risk to project delivery (low/medium/high), and any proposed mitigation measures which have or will be undertaken. | The key risks for this project are summarised as:<br>-Cost esclations (macro-economic-market related)<br>-Time taken to secure external/partner funding<br>-Integrated procurement/delivery schedule unable to be achieved<br><br>The above risks are appropraitely tracked and managed through a detailed, whole-of-project risk management framework | | |
| | Stakeholder support (and/or engagement) | Stakeholder support for the project (local community/industry/government)<br>Stakeholder engagement to date<br>Planned stakeholder management and/or engagement | Detail work which has been undertaken to date to test or confirm stakeholder support for the project, including government, industry and community stakeholders. Where this has not yet been completed, provide detail of any planned stakeholder engagement exercises for the project. Where concerns have been raised, demonstrate the steps which have been taken to address issues raised. | In 2019 two private sector proponents approached the Council (pursuant to the Council's Unsolicited Proposals Policy) with separate, unsolicited proposals proposing the integration of a new council civic building, library community learning space and town square within a broader town centre project proposal.An expression of Interest Campaign for development partner of this site to deliver a intergrated site was completed in 2019. In 2021 MBDC entered into a heads of agreement with developer Burke Urban Investments to deliver the project . Community Consultation on the Town Square Element of this project was completed in 2021 and broader consultation on other elements of this project are set to occur late 2023 and early into 2024. This project is planned to be a staged development with stakeholder engagement plans for each element. | | |
| | Upstream project dependencies | Upstream dependencies (projects upon which delivery of the proposed project is reliant) | Detail any upstream project dependencies, i.e. is delivery of the proposed project dependent on the completion of another project or program of works? Where this is the case, provide detail on (or links to) the upstream project's planned delivery timeline and current status. | In-directly, there are a number of adjoining development sites that are awaiting the development of this project to provide confidence to their proposals, substantiating the market demand for what would be similar scaled 3-4 storey mixed used development. This project will set in motion a number of tenany moves within the broader Mount Barker CBD, which will provide the opportunity to businesses seeking to enter the Mount Barker market to establish. | | |
| | Capability and capacity to deliver | Local labour and resource supply chain capacity | Provide data which indicates the level or readiness to deliver the project, including construction and operation. Consider material supply chains and local labour force capacity and capability. Where current capacity does not exist, detail any plans which are in-place (either internally under project planning or externally through government/industry initiatives) which would improve capacity to deliver. | Council has appointed an experienced Development Manager who in partnership with Burke Urban Investments, will lead the delivery of this project. Council has established a mature project management office and resource base, which is currently delivering over $130million of major projects. | | |
| | Governance | Governance structure for project delivery | Provide mapping and/or a summary of the proposed governance structure for project delivery and indicate the level and type of commitment which has been made by relevant stakeholders to this structure. | A project governance structure has been established that incorproates key Council and Burke Urban Investment representatives. Within Council, the Executive Team provides broad strategic oversight, whilst a project team provides support to the day-to-day delivery of the project. Both Council and Burke Urban Investments are allocating the appropriate resources to ensure the effective delivery of the project. | | |

In response please quote cg
13 November 2023

Strategy Team
Infrastructure SA
GPO Box 2343 Adelaide SA 5001

Dear Sir/Madam,

**RE: SUBMISSION TO SOUTH AUSTRALIA'S 20-YEAR STATE INFRASTRUCTURE STRATEGY DISCUSSION PAPER.**

The Rural City of Murray Bridge thanks Infrastructure SA for the opportunity to comment on their 20 Year State Infrastructure Strategy Discussion Paper and commends them on the work undertaken in preparing this document. Council recognises and supports the focus on economic growth that provides for the provision of accessible and inclusive infrastructure across the region.

The already recognised growth of Murray Bridge has been further reinforced by the Greater Adelaide Regional Plan Discussion Paper which identifies Murray Bridge as a 'satellite city'. Infrastructure and Infrastructure provision are two of the key components of Council's submission to the GARP Discussion paper and as such it was felt that Council's submission to this document should form the basis of our submission to the Infrastructure Strategy.

It should be highlighted that our submission identifies the lack of suitable public transport options both within and external to Murray Bridge as a key consideration. As is the location of an alternative freight bypass route as the current route impacts on existing residential development and the suggested new route takes into consideration existing employment bases such as Thomas Foods International that sits external to the town of Murray Bridge.

Included as an attachment to both Council's submission to the GARP Discussion Paper and this Discussion Paper is a copy of Council's Draft Community Infrastructure Model (CIM). The CIM is an exciting initiative which identifies growth patterns in Murray Bridge and examines the social (community centres/ education facilities) and physical (roads/stormwater etc.) infrastructure will be needed to meet this growth.

High level costings have been determined which then enables future discussions for cost distribution for future growth scenarios and allows Council and the Developer to gain a clearer understanding of responsibilities required.

The CIM provides a framework for growth to be accompanied by adequate infrastructure, which is developed at appropriate times, which includes community infrastructure. The following types of assets and services have been a key focus of the CIM:

- Transport infrastructure
- Sporting facilities (e.g. football ovals, multi-sport courts, indoor sporting facility)
- Community facilities (e.g. multi-use community hubs, stand-alone halls, libraries)
- Educational facilities (e.g. public and private primary schools, high schools and higher education such as TAFE and Universities)
- Health and aged care (e.g. hospitals, GP clinics, nursing homes)
- Government Services (e.g. service centres).

The CIM provides recommended priorities to be delivered over the next 10-15 years and beyond. However, recognising recent work on Council's Structure Plan and the aspirations of the GARP the Model needs to be aligned to those aspirations and potential future demands, and thus infrastructure scenarios and interventions will need to be updated based on the new demand for growth. Accordingly a CIM 2.0 is expected to be developed in collaboration with HIPDU in the coming months.

A key proposed community infrastructure project is a Regional Stadium within Murray Bridge. The provision of a Regional Stadium has been a key focus for Council and was originally identified in Council's Strategic Plan and Sport and Recreation Strategy. Work on this project commenced in December 2019 with a Masterplan project, followed by a feasibility study prepared in January 2021. External funding was later sought and received. The scale of the project meant that it required staging and when tender bids for Stage 1were received they far exceeded the construction budget available. It was anticipated that shortfall funding would be received through the Building Better Regions Fund however this funding opportunity was later cancelled by the Federal Government. As such, the original funding was unable to be utilised and was returned with the project now placed on hold.

The provision of a Regional Stadium still remains a key project for Council in order to support both the local and broader community particularly as it continues to grow. It is these types of facilities that require Government support and therefore it was considered important to highlight this in Council's submission.

Council would be pleased to discuss any aspect of its submission if required and are happy to work with Infrastructure SA towards outcomes that are beneficial for both Murray Bridge and its broader community and the State as a whole.

Kind regards,

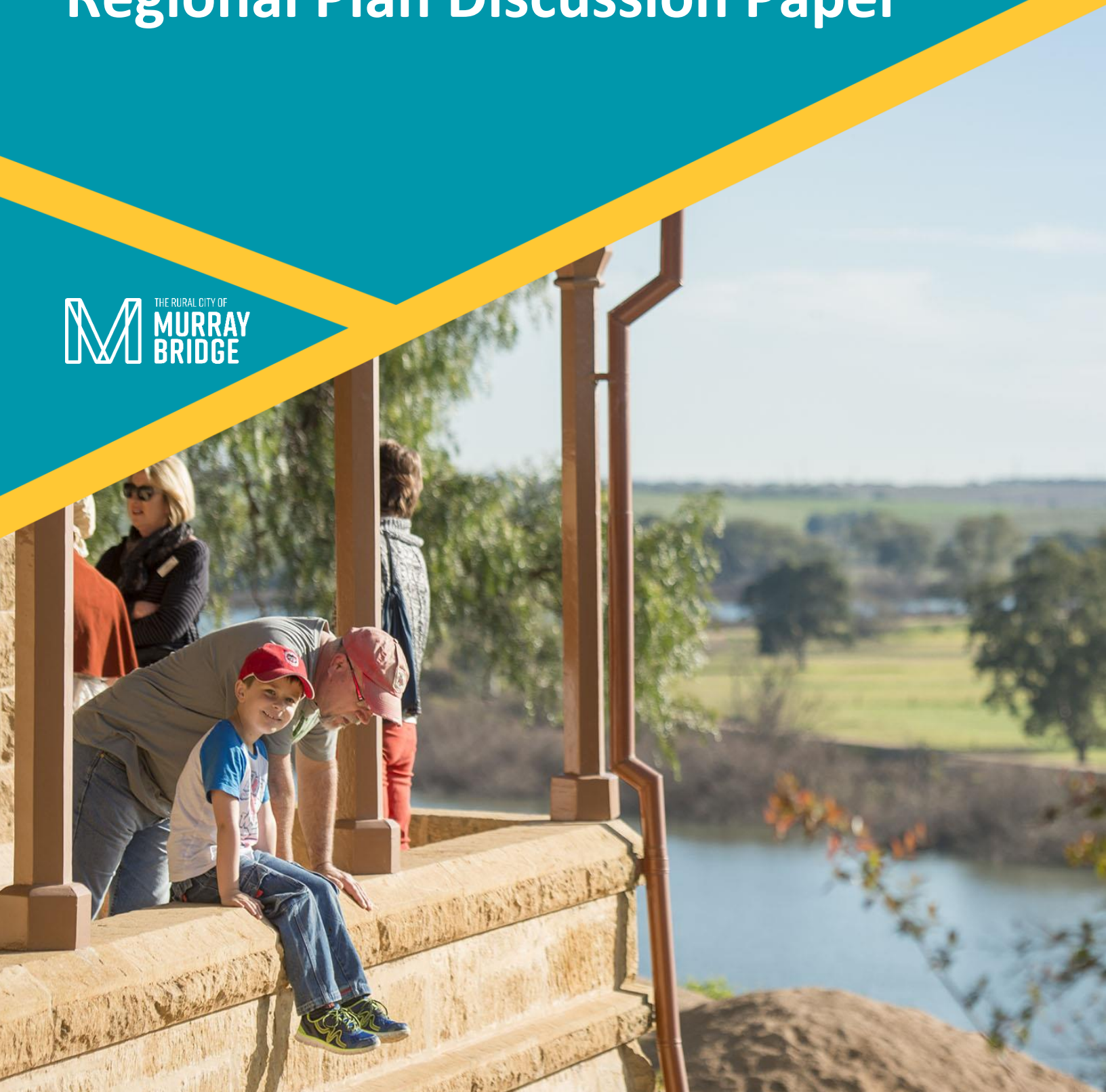
[redacted]

**Heather Barclay**
**CHIEF EXECUTIVE OFFICER**

**Attachments:**
Copy of Rural City of Murray Bridge submission to the Greater Adelaide Regional Plan Discussion Paper
Copy of draft Community Infrastructure Model (Confidential)

# Rural City of Murray Bridge Submission on the Greater Adelaide Regional Plan Discussion Paper

THE RURAL CITY OF MURRAY BRIDGE



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# Introduction:

Council thanks the Commission for this opportunity to comment on the Greater Adelaide Regional Plan (GARP) discussion paper, and congratulates the Commission for the work undertaken in preparing this discussion paper and the extensive program it has undertaken in engaging with the community.

The Discussion Paper covers an extensive body of work seeking to lead discussion over a broad range of issues across a significant portion of the state, issues that can have different priorities and different impacts across the Region. Murray Bridge is in the unique position of sitting within both the Greater Adelaide Region and the Murray Mallee region. Whilst acknowledging the similarities across the Greater Adelaide Region there are also a number of differences between Murray Bridge and the broader metropolitan Adelaide area, therefore in responding to the Discussion Paper this submission will be separated into two key areas; discussion points within the GARP which impact Murray Bridge specifically and discussion points within the GARP that apply to the larger Greater Adelaide Region.

# Murray Bridge discussion points:

The Discussion Paper highlights a 46% population increase across the Greater Adelaide Region over the next 30 years which combined with changes in household needs identifies a need for an extra 300,000 houses across this timeframe. The Paper seeks to identify considerations for how land can be made available to meet the changing housing, employment and recreation needs whilst ensuring this land supply is delivered sustainably, addresses climate change considerations, provides for health and wellbeing and inclusivity whilst enabling the Commission's aim of living locally.

In seeking to identify possible locations for these growth opportunities the Discussion Paper identifies Murray Bridge as a key growth area; a satellite city. This population growth throughout Murray Bridge has previously been recognised by Council and has led to the creation of the Future Cities program, which is a suite of investigations aimed at ensuring Murray Bridge is prepared for growth. This program includes the Murray Bridge Structure Plan, the Community Infrastructure Model (examining the timing and provision of infrastructure needs under various growth scenarios) and the Residential Growth Areas Code Amendment which has recently completed the consultation phase. As such the inclusion of Murray Bridge as a satellite city is supported by Council.

Noting that the Greater Adelaide Region covers such an extensive area and identifying both Murray Bridge and Victor Harbor as satellite cities designates both their significance in managing growth but also their distinctiveness and separation from metropolitan Adelaide. Council suggests that consideration be given to examining the use of sub regions within the Greater Adelaide Regional Plan, such as the Mount Lofty Ranges, the Fleurieu and Mount Barker/ Murray Bridge. This would enable key policy direction that responds to issues that are unique to these areas but not necessarily relevant to others.

## Expected growth:

For some time the Rural City of Murray Bridge has been aware of the significant growth occurring within the Local Government area. This is reinforced by investigations recently undertaken as part of the Murray Bridge Structure Plan investigations which examine the growth projections provided for a series of recent studies. Investigations for the Structure Plan identified that whilst population projections have been adjusted downwards significant population growth is still expected:

> "The Rural City of Murray Bridge is forecasted to undergo significant population growth, with an expected population change of 20.3% from 2023 – 2041. It is anticipated that the region's population will increase to 27,733 (+ 4,696 persons) by 2041, from a 2023 population of 23,037. It is notable that growth projections for Murray Bridge have been adjusted downwards over time. At the time of the preparation of the 2015 Structure Plan, the forecast growth rate was 1.65% p.a., while the 2022 review of this plan reduced that figure to 1.50% p.a. The latest .id profile report of March 2023 is now anticipating growth rates declining from 1.39% p.a. in 2026 to 0.94% p.a. by 2041"

Whilst not finalised at the time of preparing this submission a draft Structure Plan has been prepared which incorporates initial community consultation, it is anticipated that the draft Structure Plan will undergo public consultation prior to the end of 2023, and the final version will be available for ongoing discussions with Planning and Land Use Services as the Greater Adelaide Regional Plan is finalised. Other key considerations identified within the draft Murray Bridge Structure Plan include:

- At the time of the 2016 Census lone person households were the third largest household type and has since experienced growth of 2% (+ 331 households) resulting in this group becoming the dominant household type
- Over the past five years Murray Bridge has experienced notable change in the following employment sectors: A 4.4% decrease in Wholesale Trade (-359 people), a 3.1% increase in Health Care and Social Assistance (+297 people), a 1.7% increase in Agriculture, Forestry and Fishing (+173 people) and a 1.9% decrease in Retail Trade (-125 people
- Labourer is the predominant occupation type within Murray Bridge (20.4%), despite experiencing a 3.8% decline (-270 people) since the 2016 Census. The second largest occupation consists of Community and Personal Services Workers at 14.5% (1,263 people), which has experienced a growth of 2.5% (+248 people). This is then followed by Technicians and Trade Workers at 13.8% (1,067 people).
- The overwhelming majority of Murray Bridge residents are employed locally, with only 23.3% employed outside Murray Bridge.

Feedback from the initial round of consultation for the Murray Bridge Structure Plan aligns with a number of the issues raised in this submission and also identified in the GARP Discussion Paper, these include:

- Housing and Accommodation - more worker housing, more affordable options, infill housing
- Recreation and Sport - water based activities utilising the river, co-locate sports at a recreation hub, expand gymnastics centre
- Streetscape and Main Street activation - encourage reuse of vacant Bridge St buildings, continue streetscape improvements, develop linkages between Bridge St and other key areas.
- Industry and Farming - increase zoned industrial land to encourage more investment and employment, focus employment precincts around Thomas Foods International and Costa Mushrooms.
- Education and Childcare - encourage shared education and community use facilities, new school required to serve western expansion
- Open Space, Conservation and Greening - further development of cycle/pedestrian linkages, increase shade, seating options, increase tree planting.
- Community Activities, Events and Services - increase events and use of Sturt Reserve, utilise Bridge Street for community facilities

- Health and Wellbeing - increase opportunities for aged care facilities, expand hospital and GP services, increase accessibility to mental health and wellbeing support service.
- Culture and Heritage - revitalise the railway precinct for events and tourism, dual signage in both Ngarrindjeri and English
- Transport and Services Infrastructure - improved public transport options, divert heavy vehicle movement away from residential areas, rural bypass.
- Tourism - take advantage of the River for accommodation options, short term accommodation and bed'n'breakfast and farm stay opportunities.

A copy of the draft Structure Plan is included with Council's submission.

## Transport/ Public Transport options and opportunities:

### Public transport:

The Discussion Paper, whilst identifying the important role that transportation plays in providing for the key outcomes desired from the Greater Adelaide Regional Plan, does not appear to place sufficient emphasis on just how significant the need is for suitable public transport and access to suitable transport options. This is particularly true for Murray Bridge and the role it will play as a satellite city.

Investigations for Council's draft Structure Plan have identified that 71.8% of Murray Bridge residents were employed within Murray Bridge with only 23.2% employed elsewhere. Of those who worked outside of Murray Bridge, employment was mainly located within Mount Barker (4.1%) and the Coorong (3.4%). The main travel method to access employment was by car (76.4%), with 69.6% travelling as the driver and 6.8% as a passenger. Only 0.4% of residents used public transport to access employment.

This high reliance on cars as the main form of transport to and from employment can easily be attributed to the lack of public transport options available within and around Murray Bridge. Murray Bridge is currently only serviced by a regional bus service which offers eight services per day between Murray Bridge and metropolitan Adelaide, reduced on the weekend, along with four township routes that run twice a day, primarily to provide students accessibility to public transport to attend school. Additional investigations should occur into the provision of a public transport option that considers both internal movements throughout Murray Bridge as well as external to Murray Bridge. For example Thomas Foods International plays a significant role in the economic and employment future of Murray Bridge and the broader area, access to this site is currently only available via private vehicle, consideration should be given to the investigation of public transport options that enable the employees of Thomas Foods and other employers external to the city who live locally in Murray Bridge to easily access their workplace by methods other than just private vehicles. The lack of suitable public transport both in and around Murray Bridge impacts on the ability to meet the GARP's proposed outcomes particularly those relating to climate, sustainability and well-being and should be investigated further and opportunities should be provided for how this can be managed

Council agrees that the South Eastern Freeway provides the most suitable transport link between metropolitan Adelaide and Murray Bridge, however the lack of public transport options between metropolitan Adelaide and Murray Bridge will impact on the ability of the GARP to meet its proposed outcomes particularly in relation to climate change, well-being and the provision of a strong economy built on a smarter, cleaner, regenerative future. Future investigations should include ways to improve public transport links to ensure that opportunities for providing sustainable transport options can be provided between Murray Bridge and metropolitan Adelaide.

Being cognisant of Murray Bridge's expected growth Council has undertaken considerable work on a "Community Infrastructure Model", an investigation into the physical and social infrastructure requirements for Murray Bridge under a number of growth scenarios. From a physical infrastructure perspective this investigation examines how and when population growth will trigger the need for road network upgrades or additional infrastructure such as the provision of roundabouts. Council believe this will prove useful when examining

transport and access requirements throughout Murray Bridge. The Community Infrastructure Model summary will be provided as part of Council's submission to the GARP.

### Freight Bypass:

Council also considers it important that a Freight Bypass is included in any investigations that are likely to occur in relation to growth, economic development and transport. Hindmarsh Road, Maurice Road through to Cypress Terrace which run through residentially zoned land within Murray Bridge, is currently an identified B double and Over Dimensional route, which leads to ongoing truck movements throughout this residential area. This is already having a negative impact on residents within the area, as identified from responses to the draft Structure Plan. and Increased growth and additional traffic movements will only add to this. In order to meet the outcomes identified in the Discussion Paper then a freight bypass for Murray Bridge should be investigated, noting that there are a number of key industry and employment sites existing within the Murray Bridge area and a potential freight route between Monarto and Pallamana has already been identified as providing a number of benefits.

Council recommends a Freight Bypass, via Monarto South Interchange, via Ferries McDonald Road, Schensher / Pallamana. Such a bypass supports alternative freight movements into Adelaide (other than via South Eastern Freeway). It also services growth employment lands in Monarto and Pallamana (TFI). This is explored further in our response as it relates to employment lands.

### Aviation facility:

Given the expected growth identified for the Murray Bridge area and its identification as a satellite city, Council is keen for the Greater Adelaide Regional Plan to consider its potential as a location for a future airfield. The Murray Bridge region has the advantage of having direct transport links to metropolitan Adelaide whilst having an abundance of rural land surrounding the main township which has the opportunity to be examined for such a facility. Notwithstanding there is an existing airfield at Pallamana, work was undertaken in 2016 in relation to the suitability of land south of the Freeway at Monarto for an aviation facility and this work is included as an attachment to this submission.

## Infrastructure:

Council have been keenly aware of the need for adequate infrastructure provision, particularly within growth areas, this has led to work being undertaken on a Community Infrastructure Model (CIM). This work has examines physical infrastructure needs, such as road network requirements under different growth scenarios. For example, what would the potential traffic impacts be on the main entrance routes to Murray Bridge under different growth projections and what would happen in a 'do-nothing' scenario. The CIM identifies what upgrades may be needed under a fully developed scenario. This data can then been utilised to examine costs associated with the required work and provides Council the opportunity to negotiate a per allotment cost with developers. This work is current examines a 2032 scenario and now requires alignment to Councils Structure Planning to understand potential interventions and timing for both social and civil infrastructure under a fully developed scenario, to ensures that both Council and Government to understand required physical infrastructure and when it is required.

As an identified growth area Council would welcome the opportunity to continue to work with State Government in further developing this work to ensure that infrastructure needs are able to be met and managed in a fair and equitable way as Murray Bridge grows. Accordingly, we welcome opportunities to work with DIT, PLUS and HIPDU, to develop the following;

1. Finalised Structure Plan (incorporated into GARP)
2. Infrastructure Plan (including timing/cost)

3. Investment Plan
4. Contribution Framework for delivery (including responsibilities).

## Employment:

### Monarto South:

The Discussion Paper examines the critical role that the planning system plays in supporting economic growth and development, and as part of this seeks to ensure that sufficient land is available for current and future employment and industrial land uses. The paper suggests that such land should also be serviced and connected via means such as digital infrastructure, roads, rail, ports and airports, is well connected to a skilled workforce, and is protected from incompatible land uses.

Further to this, Figure 15 within the Discussion Paper identifies Callington as a proposed area of investigation for Employment Growth, noting that most of the area surrounding it is primary production land with a small pocket of rural living land and additional pockets of employment land.

It is Council's view that the area of Monarto South provides far greater opportunities for employment growth than does Callington, the reasoning for this recommendation are identified below:

Monarto South already has a significant portion, approximately 430ha, of land already zoned for Strategic Employment, with a number of industries already established within the locality. Amongst other industries, Monarto South is home to:

- Australian Portable Camps: provider of modular construction and camp solutions within a purpose built manufacturing plant covering 64 hectares and supports approximately 400 employees nationally, with half of that workforce based at Monarto.
- SA Sawdust Sales: processing and manufacturing plant and headquarters.
- PomiGold: pomegranate sorting, packing and storage factory
- Penta Transport - Daily freight to and from Adelaide and Melbourne
- The creation of the Monarto Innovation Precinct at the former Big W Warehouse and Distribution Centre has seen the establishment of an Industrial Hemp processing facility, together with further interest from other circular economy operations.
- Inghams Hatchery is also located in the southern portion of Monarto South with a number of chicken farms in the vicinity
- The broader locality also includes Costa Mushrooms, which has an employee base approximately 500 and Monarto Zoo which is a key tourism and economic driver for the region with the Wild Africa accommodation currently under construction and an ecotourism accommodation currently under assessment.

The location of Monarto South is also a key advantage due to its proximity to key transport links, with the South Eastern Freeway on the southern edge of the Strategic Employment Zone, and Ferries McDonald Road which has direct access to the Freeway. The site is also served by the ARTC interstate rail line with the potential for an intermodal facility investigated in 2016.

This locational advantage is also key from a landscape amenity and primary production perspective as the Bremer Valley, which is a fertile agricultural area with its hills and valleys providing an important backdrop to Callington. The views experienced from the Freeway are quite picturesque and any industrial expansion has the potential to negatively impact upon these views. Council is therefore supportive of the inter-urban breaks and believe that further work could be done in identifying key scenic routes and locations.

A significant body of work was undertaken 2016 as a combined Rural City of Murray Bridge, District Council of Mount Barker and RDA Murraylands and Riverlands initiative which culminated in the Monarto Master Plan, this report brought together a series of working papers on native vegetation and wildlife corridors, a potential future intermodal facility, employment lands, provision of core infrastructure (water supply, power gas and telecommunications), the potential for an aviation facility and the relationship with the Monarto Safari Park. A copy of this work will be forwarded to the Commission as part of Council's submission to the Discussion Paper.

## Other employment opportunities:

The GARP Discussion Paper examines the provision of employment lands within the Greater Adelaide Region and the demand for employment types, it suggests that 'Traditional' industries such as manufacturing, construction and other uses which have the ability to generate off site impacts fall under the category of 'strategic' uses. The Discussion Paper further suggests that traditional industries should be grouped with other like activities and "*given the strategic importance of these locations….. They need to be preserved and protected from encroachment of sensitive land uses*". This is consistent with outcomes identified within the draft Murray Bridge Structure Plan which examined existing 'traditional' employment land uses of Thomas Foods International abattoir , Costa Mushrooms growing and processing plant and Flagstaff Park Industrial Area (incorporating Big River Pork and Ingham's Feedmill) and recommends they be investigated for potential rezoning which seeks to protect the existing land uses from interface issues whilst also enabling the establishment of land uses that are similar in nature that can expand and value add to the surrounding primary production or rural land uses.
Noting that these sites are already serviced by appropriate infrastructure including gas/ water and power.

## Primary Production land:

Whilst Council supports the focus on growth within the Discussion Paper, particularly as it pertains to the Murray Bridge area Council also believes the role of primary production land cannot be ignored. The Rural City of Murray Bridge has a land area of 1,832 square kms a significant portion of which is primary production or agricultural land. Whilst it is noted there is mention of the Environment and Food Production Area in the Discussion Paper it infers that it is an area for future growth consideration unless within the Character Preservation Areas. The economic value of agriculture appears to be ignored and Council is keen to ensure that the GARP examines ways in which the primary production sector can be sustained and ensure that planning policy supports the continued importance of these areas so as not to be unduly impacted by urban growth. Further to this the GARP should also examine the loss of policy that occurred during the transition to the Planning Development and Infrastructure Act, particularly as it relates to interface issues within and around Primary Production areas. It is suggested that PIRSA be engaged to undertake a land suitability/ capability analysis to determine high value and low value primary production land to assist with this process.

# Additional discussion points:

Whilst the comments above are focussed specifically on the relationship between the Discussion Paper and the Rural City of Murray Bridge local government area, the comments/suggestions below whilst noting Murray Bridge relate more broadly to the Greater Adelaide Region.

## Natural Hazards:

Whilst the discussion paper identifies the need to understand the hazards and risks associated with climate change and climate change adaptation, it focusses on risks such as coastal flooding, erosion, sea level rise and bushfires, Council believes that consideration should also be given to the role the River Murray plays within the Greater Adelaide Region. Amongst other things the river provides economic, tourism, well-being, water security and open space opportunities for the broader region and not just Murray Bridge. The river however also is subject to a number of natural hazards, one of which, riverbank slumping does not appear to have been identified as worthy of further investigation as part of the final GARP.

## Open Space:

The Discussion Paper suggests the development of a new Open Space Strategy for Greater Adelaide expanding the existing Metropolitan Open Space Strategy (MOSS) this does not appear to have been extended to the non-metropolitan areas of Greater Adelaide and Council believes this should be further investigated. Whilst areas such as Murray Bridge already have large areas of recreational open space such as Sturt Reserve, provision should be made to ensure that useable open space is provided, when needed, within land that will be subject to future sub divisions. The Regional Plan should seek to ensure that as the region grows the availability of suitable open space grows at the same pace. This open space should be of a size and within a location where it can be actively utilised and assists in providing the intended outcomes associated with a greener, wilder region. Additionally, there are significant tracks of undeveloped land throughout the Greater Adelaide Region that provide opportunities for recreational open space, or alternatively should be protected from encroachment by inappropriate development. As mentioned in the employment section Council is keen to ensure that the Bremer Valley escarpment is protected.

## Climate Change:

Whilst Council appreciates the significant work required to determine climate change predictions and associated impacts, Council is keen to ensure that consideration be given to current and longer term master planning sites and how the impacts of climate change could impact upon housing, open space provision and landscaping. Recent changes to the PDI regulations that enable the establishment of dwellings within master planned zones without the need for a planning assessment do not appear to have climate change impacts as a consideration, particularly with respect to housing design. In addition will these master planned communities ensure adequate landscaping to provide important tree coverage and or private open space, and will what is being planted be able to adapt to climate change impacts over time? Additionally has consideration been given to new dwellings and whether or not they will be suitable for habitation, still provide a sense of community, a liveable space or will the impacts of climate change render them uninsurable or too expensive to maintain?, aAre the climate change mitigation costs considered too expensive for implementation?

## Social Planning:

The Discussion Paper makes little mention of the specific role that social planning and social infrastructure plays in achieving the outcomes the GARP is seeking to achieve. Whilst it is noted the Discussion Paper aims for "A more equitable and socially cohesive place" and notes the need for public spaces and services, the responses are fairly standard in that they discuss integrated planning, design quality, adaptive reuse, cultural heritage and the desire for housing diversity. , These are all aspects that can be attributed to other elements of the planning system and are not specific to enhancing social outcomes. Greater emphasis should be placed on identifying specific social planning objectives and ways in which these can be achieved. Examples of such include access to appropriate education, recreation, sporting facilities, hospitals and other health services,

community safety and how this can assist in making growth sustainable. To this end Council has established an 'education precinct' and a co-working hub for small business expansion which has a regional focus on innovation, business development, education and skills development for local people and will provide greater opportunities for social cohesion within the Murray Bridge and regional community.

## Conclusion:

Elected members of the Rural City of Murray Bridge are very supportive of the need for Murray Bridge to grow and the opportunities associated with this. They are however keen to ensure that growth is matched with the provision of suitable infrastructure and provides for the wants and needs of the local community. In examining the potential growth opportunities they have workshopped a list of aspirations over the next thirty years that provide the ultimate scenario for a future Murray Bridge. This list considers issues such as housing, transport, open space and recreation and health and well-being and is included as an attachment to this submission.

Council looks forward to a continued and ongoing working relationship with the Commission to seek the outcomes identified within the Greater Adelaide Regional Plan and to ensure an alignment with Council aspirations, the outcomes of the Murray Bridge Structure Plan, and the Greater Adelaide Regional Plan.

## Attachments:

Draft Murray Bridge Structure Plan
Murray Bridge Residential Growth Areas Structure plans. Feb 2015
Murray Bridge Residential Growth Areas Review (Updated Structure Plan report). April 2022
Monarto Masterplan. November 2016
Community Infrastructure Model (Confidential Draft)
Callington Township Plan. May 2020
Murraylands and Riverland Freight Transport Options 2021 Report
Council Aspirations and CEO presentation

**6 December 2023**

Strategy Team
Infrastructure SA
E: tara.hage@sa.gov.au

Dear Tara,

**Subject: South Australia's 20-Year State Infrastructure Strategy - Discussion Paper feedback**

The City of Whyalla appreciates the opportunity to make the following submission of responses to the questions posed in the South Australia's 20-Year State Infrastructure Strategy - Discussion Paper.

We further appreciate and thank your Office for the extension granted to make this submission on a strategy document of critical importance to the City of Whyalla as we transition to a Green City, home to one of the world's largest Green Hydrogen Hubs.

The responses we submit are predominately based on the needs of our Regional City community over the next two decades.

We have huge demand for skilled workforce within regional SA with thousands of jobs in the Spencer Gulf Region alone (refer Attachment 1), yet the majority of the state's population base is centred in metropolitan Adelaide. Strategic planning and co-ordinated 'targeted' investment in infrastructure (transport, housing, water, community) is critical to commence addressing the challenge that having an inadequate skilled workforce and population living in regional SA will have on our State's economic growth and prosperity.

We contend that a strategic transition from South Australia being 'a (one) city state' to a 'three city state', with a strategic investment in Mt Gambier in the South and Whyalla in the North of the state, is critical to addressing the current inherent structural limitations within our state. A strategic investment in Mount Gambier and Whyalla - as two contemporary regional cities of sustainable scale - will create a hub and spoke model that will increase the capability and capacity within the regions to the north and south of metropolitan Adelaide, thereby (over time) reducing the current dependency on metropolitan Adelaide from all regional towns and localities outside metropolitan Adelaide.

Should you have any queries in relation to City of Whyalla's submission, please do not hesitate to contact Mr Justin Commons on E: [redacted] or M: [redacted].

[redacted]

Justin Commons
**Chief Executive Officer**
**City of Whyalla**

ATTACHMENT 1

## Upper Spencer Gulf Investment Pipeline*

Regional Development Australia

**86** PROJECTS

**$30.9B** Pipeline value

**25,828** FTEs in construction

**RENEWABLES**
**14 projects**
*$4.25B investment*

**VALUE-ADD MANUFACTURING**
**9 projects**
*$17.1B investment*

**LIFESTYLE & ACCOMMODATION**
**11 projects**
*$243M investment*

**54%**
***Preparatory stages***
*(share of pipeline volume)*

**19%**
***Public sector***
*(share of pipeline value)*

**Based on August and September investment pipeline reporting prepared by RDAs Eyre Peninsula, Far North and Yorke and Mid North.*

*While every reasonable effort has been made to validate this data, no representations are made or guarantees supported as to the veracity of the information relied upon in preparing this analysis.*

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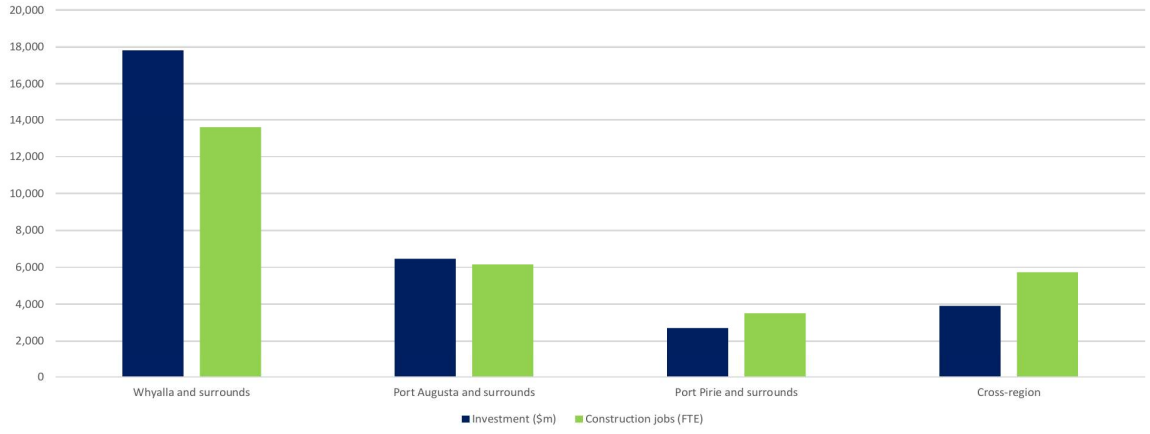
## Upper Spencer Gulf Investment Pipeline*




**Based on August and September investment pipeline reporting prepared by RDAs Eyre Peninsula, Far North and Yorke and Mid North.*

*While every reasonable effort has been made to validate this data, no representations are made or guarantees supported as to the veracity of the information relied upon in preparing this analysis.*

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### *Consultation question 1*

*What opportunities should we consider to improve South Australia's economic growth?*

South Australia's greatest economic opportunities revolve around the development and application of green technologies; our State's abundant natural resources – both renewable resources (wind and solar) and mineral resources (in particular rare earths, copper and magnetite); and our food produce. Our State needs to value add to the resources and food produce, to reduce/end the wholesale export of unprocessed raw materials.

We need to rebuild our manufacturing capabilities to meet our own needs and export to a world hungry for sustainable green products. This includes taking advantage of the value-add opportunities from consuming locally produced green hydrogen and rare earths, and manufacturing locally the components needed for solar and wind farms, electrolysers for hydrogen production, and EV batteries.

### *Consultation question 2*

*What infrastructure constraints are preventing a more efficient, accessible, and productive freight sector?*

**Expansion of existing deep sea ports**.
An opportunity exists to further develop existing deep sea ports to facilitate the efficient transport of export resources and imported products and materials required to support 'green' initiatives, especially on the Eyre Peninsula.

Limited port facilities often translate to more heavy vehicles on our road network carrying resources or product back to locations for shipping (e.g. Port Adelaide), when instead the product(s) could have been exported/imported in other locations (e.g. Port of Whyalla). An example of this is the trucking of graphite from Renascor's mine on the Eyre Peninsula to be processed near Bolivar, then trucked to Port Adelaide for export, when the processing and export could have been done in/from Whyalla.

The Port of Whyalla can play a significant role as an economic driver and a catalyst for growth throughout Eyre Peninsula, the State and nation. The Port of Whyalla's vision is to develop Whyalla into a leading and efficient global-scale port, capable of facilitating growth and development of existing and new trades in a green, sustainable manner.

The Port of Whyalla seeks to embark on an ambitious diversification strategy. Whilst iron ore exports provide a stable foundation for our growth, we are driven by the need to grow and diversify our trade base to meet the demands of future precinct and regional customers and the introduction of containerisation of some exports.

The development of a Whyalla Port Master Plan would outline the key strategic development opportunities for the Port and the broader region, including:

- The Whyalla Container Terminal
- The Whyalla Bulk Terminal

- Containerised graphite exports
- A Maritime Precinct (for commercial fishers), and
- The continuation and growth of major bulk trades including iron ore, hydrogen fuel, fertiliser, cereal crops and mineral concentrates.

## Road Networks

There are way too many heavy vehicles on our road networks, creating a dangerous mix of vehicles - often on roads not equipped for such a mix of vehicles, not constructed to a standard to withstand increased heavy traffic, nor easily (cost effectively) maintained.

The Lincoln Highway between Arno Bay and Whyalla is an excellent example. As mentioned above, the expansion and recent export orders Renascor has received for the supply of graphite, will see the mined graphite being purified at the mine site (using Murray River water), then transported by numerous diesel-powered heavy vehicles, every-day, to Bolivar in northern Adelaide. These trucks will use the Lincoln Highway and then commute through the City of Whyalla, on a the route that includes a large education precinct. The Lincoln Highway is a popular road for tourists towing caravans and campers. Between the mine site and Whyalla there are only a couple of overtaking lanes on the Lincoln Highway, and the additional planned overtaking lanes between Whyalla and Port Augusta remain unfunded.

It is argued that the projected increase in total freight movements being by road to 77% is largely due to the absence of appropriate rail infrastructure. Given road freight generates more emissions than rail, it is recommended that a strategic investment in rail is needed to curb the projected increase in heavy vehicles on roads.

## Rail potential

A great proportion of heavy vehicle freight criss-crossing South Australia should be transitioned to rail, using roll on, roll off rolling stock. A popular efficient and effective mode of freight transport in Europe and the USA.

It is suggested that a direct intervention in rail investment is needed as an increasing number of Heavy Vehicles on roads is both detrimental to road safety and the push towards net zero. Whilst there is a significant capex associated with establishing rail

capability, the long term benefits (social, economic and environmental) should outweigh the initial outlay.

**Regional rail passenger services** need to be reintroduced between Adelaide and regional capitals and towns. The services should ideally be fast passenger trains, powered by hydrogen engines, that are manufactured in South Australia.

There is a huge pipeline of $30B projects for the Spencer Gulf Region generating an additional 25,000 jobs (refer RDA Pipeline Report). The region does not have the workforce currently to service this increase with significant numbers of the skilled workforce commuting into region (DIDO/FIFO) from Adelaide. At some we will reach a 'tipping point' where it will be more cost efficient and effective for metropolitan based Adelaide workers (particularly from the Northern Suburbs including new suburbs like Riverlea) to commute to jobs in the Spencer Gulf region using passenger rail (as opposed to using road our air), compared to commuting to inner metro local government areas. We have the jobs in region but not the people – we need to get the people to where the jobs are.

Working in partnership with one of the European Union's most sophisticated hi-tech rail operators; a hi-tech spin-off hydrogen train manufacturing, research and development Hub would be based in Whyalla to add value to the Port Bonython Hydrogen Hub, SA Hydrogen Power Station and Hydrogen Storage Facility.

The high-speed hydrogen passenger train would be trialled in parallel to trials being undertaken in Europe, with Whyalla being identified as the Australasia and Pacific R&D Headquarters. Hydrogen technology is an emission-free alternative for non-electrified railway lines, where diesel trains are now operating and if successful, could expand across Australia transforming and greening passenger rail services.

*"Public transport production: More trains, trams and ferries will be manufactured locally"*

*"I want to use the power of government to bring back Aussie manufacturing. Because Australia should always be a company that makes things."* Source: Prime Minister Anthony Albanese

## Regional Airports

Regional Airports owned and run by Local Government Authorities are not sustainable, particularly those that must provide passenger and baggage security screening requirements as prescribed by Department of Home Affairs (such as Whyalla Airport). Yet Regional Airports are an essential service to regional townships and cities, playing an important role in economic development, social wellbeing and freight - such as medical blood samples from clinics and hospitals, requiring urgent analysis; perishable foods such as fish exports; and the essential movement of people for business and workers; and tourism.

The estimated increase in passenger numbers to move through Whyalla Airport, over the next ten to twenty years, associated with the pipeline of major projects underway in the Council region, will require the repair, lengthening and strengthening of the main runway, at a cost of approx. $25Million. This capex hugely exceeds the budget capacity

of the Council and its local ratepayers ability to pay – both to undertake upgrade works and the ongoing maintenance.

South Australia should collaborate more with the Federal government to set South Australia up as an early adopter of new aviation infrastructure to support new technologies. (e.g. Flying taxis), by supporting and investing in the operating pads to be constructed at sites like the Port Bonython Hydrogen Hub to ferry passengers to nearby mines or Gulf cities or Whyalla airport. Flying taxis could also support the private sector for the transportation of people and freight to locations such as Carrapateena and Oak Dam. Interstate jurisdictions such as Queensland are likely to be first movers for flying taxis however South Australia could collaborate with the Federal Government and other states to implement legislation and regulation to support the establishment of this industry.

Autonomous, Electric Vertical Take-off and Landing (eVTOL) aircraft terminals will service e-air taxis and e-drones that will dominate relatively short connections between regional centres and Adelaide. Whyalla should be developed as a regional centre for the operation of eVTOL aircraft for freight, passenger and tourist aerial mobility

## Ship Building

ASC is ideally positioned to diversify from solely defence vessels to build a 21st century hydrogen powered Roll On – Roll Off ferry, to operate between Kingscote - Port Adelaide - Port Lincoln – Whyalla (a modern 21st century incarnation of the MV Troubridge).

## Energy Efficient / Environmentally Friendly Freight Transport

All long-distance freight movements, whether by air, rail, road or sea, should utilise clean/green fuels as opposed to traditional fossil fuels such as diesel. As a result, a network of both hydrogen and EV refuelling stations are needed across our state with linkages to similar networks on interstate routes, to support the take up of electric and hydrogen powered vehicles. (refer SAH2H re hydrogen refuelling stations and supply chain opportunities associated with hydrogen).

### *Consultation question 3*

*How can we enable a sustainable and affordable water supply into the future?*

All South Australian regional townships and cities should have access to local recycled potable water and/or desalinated potable water.

South Australia, with Federal government assistance, should be completely free from consuming Murray River Water.

The Northern Water Supply Project is critical to providing a sustainable non-Murry River water source to support the growth of both industries and communities in the north-western part of our state. Desalinated water facilities, if designed and managed appropriately, will provide an environmentally friendly alternative water supply as opposed to further degradation of the Murry Darling Bason and Great Artesian Basin.

Critical to the future of Whyalla's socio-economic growth will be access to and supply of potable water to complement and support local industry needs such as the proposed hydrogen production precinct, nearby mining of iron ore and rare earths, resource processing, 'Greening of Whyalla' Program and hi-tech manufacturing. Potable and recycled water is required for a growing population and retrofitting urban sensitive urban design across Whyalla as well as SA Water network augmentation is needed to address current issues with water pressure, quality and availability that inhibit future development.

Whyalla should not rely solely on potable water pumped from the River Murray via the Morgan-Whyalla pipeline first commissioned in the 1940's. The current water supply is unsustainable and a high supply security risk to industry, businesses and residents. Saved River Murray water can be returned to increase river flows downstream from Morgan.

The Northen Water desalination plant, currently being investigated by Infrastructure SA, ideally will focus on working with the CSIRO to discover innovative ways to dispose of - or put to better industrial application - the hypersaline wastewater produced through the desal process; negating/reduce the need to pump the hypersaline water back out into the Spencer Gulf.

### *Consultation question 4*

*How do we realise the opportunities and mitigate risks with transforming our transmission and distribution infrastructure for the future?*

It is essential that consumers and power generators are close together to reduce the distances the energy needs to be transmitted. The current long distances sustainable wind and solar energy needs to be moved to NSW and Victoria seems to be more about protecting supply for the two eastern states as they ween off fossil fuel power generation.

The State Government ownership of the Whyalla Hydrogen Power Station is a brilliant Strategic Energy move. The ability to firm the national electricity grid as/when required using stored hydrogen as a power source is commended. Also the Hydrogen and Renewable Energy Act will strategically enable the development of grid scale solar, wind and hydrogen facilities across the state. Use of grid scale Battery Energy Storage Systems should also be supported.

### *Consultation question 5*

*What are the barriers to increased adoption of digital technology to improve productivity?*

In Regional South Australia the lack of secure, affordable big data digital technology infrastructure is proving to be a significant barrier to economic growth and competitiveness.

All regional towns, cities and their industrial/business districts should have access to optical fibre to the premise. At least a ten gigabit service should be on offer.

More Wi-Fi tower services running off optical fibre are needed in regional South Australia, to cover the many known black spots. This action would include the replacement of all microwave wireless connections with Optical fibre and additional shared telco towers to ensure all major roads have no black spots.

Port Bonython has been identified as our State's primary Hydrogen Production and Export Hub of global significance. The nature of the business activity within the Port Bonython Hydrogen Hub will require 21st Century telecommunications to move large volumes of data securely and quickly.

Optical fibre data cable infrastructure will be an essential enabler for the hydrogen start-up businesses operating within/adjacent the Hydrogen Hub, businesses operating in a global marketplace that is connected 24/7, 365 days of the year. It is anticipated the fibre backhaul and network will also be required in the adjacent Cultana Defence Training Range and the nearby Council owned Whyalla Barson Industrial Park. Working in partnership with the NBN Co, an optical fibre backhaul link from Whyalla to the Port Bonython Hydrogen Hub - via the Whyalla Barson Industrial Park – is critical infrastructure to provide a Fibre To The Premise network to each precinct.

### *Consultation question 6*

*What investments could unlock the value of South Australia's resources?*

Investment in industry that can manufacture locally needed products, using locally derived resources. i.e. the previous example of Renascor graphite destined for overseas manufacturing of vehicle batteries, should instead be used to manufacture vehicle batteries domestically in a location near the Arno Bay mines (e.g. Whyalla).

Expansion for the Whyalla Port to facilitate containerised exports should also be explored (see "**Expansion of existing deep sea ports'** comments in Question 2**)**

### *Consultation question 7*

*How can South Australia better coordinate infrastructure investment to support a growing population?*

It is essential the infrastructure be built and put in place before the population grows, so as to avoid the ongoing 'catchup' and inevitable delay of projects and social challenges, such as those we are currently experiencing with housing shortages

SA Water infrastructure is particularly "problematic" in many jurisdictions, particularly regional locations (see further comments under Question 2)

Whilst we support the need for integrated land use and infrastructure planning through the State Planning Commission's regional planning process, there appears to be no/limited planning by the State Government into the land/facilities it owns/occupies in regional location such as Whyalla. For example, the current facilities occupied by SAPOL, the Court House, Fire and Ambulance Services etc are at end of life and not meeting contemporary standards, however there is no roadmap for renewal/upgrade of these facilities.

We understand that there needs to be a staged and co-ordinated plan for investment in contemporary state owned/occupied facilities in a city such as Whyalla, and we strongly advocate for shared use facilities - where multiple state agencies and council share common infrastructure.

For example, a shared use building accommodating courts administration, SAPOL and Council could have one reception, one set of toilets, common/shared meeting rooms, one staff kitchen, the room used as a court room during the day could be used by council as a council chamber in the evening, etc. Given the significant additional cost of construction in regional locations, integrated, shared use facilities with joint investment is needed to make the business case for investment stack up.

It is recommended that the State consider a joint investment with the Council (and potentially Federal Government) into a new 'Whyalla GovHub' precinct/building, comprising a contemporary Civic Centre, Court House, Police Station and Australia Post agency. The Whyalla GovHub (similar to Bendigo GovHub) will centralise the delivery of a range of government services currently provided at a number of different locations in and around Whyalla, and be sited in the new CBD/Civic Precinct of Whyalla as identified in the Draft Eyre and Western Regional Plan.

The building will accommodate up to 300 workers across multiple agencies, including City of Whyalla, Australian and South Australian Government staff - creating a one-stop-shop for customers while building a stronger and collaborative public sector presence in Whyalla. This development will also enable shared services and shared infrastructure between multiple agencies across the three levels of government, delivering productivity efficiencies, reduced operating costs, and better real-time services to customers.

### *Consultation question 8*

*What can be done to support sufficient, fit-for-purpose housing to improve housing affordability?*

Historically, Whyalla worker housing needs has been met initially by BHP and by the State government through a strong public housing policy. A policy that attracted business investment and workers to a relatively remote regional city to manufacture steel, mine ore and construct ships.

Rapid and proposed investment in new industry sectors such as solar power and hydrogen, major construction projects and associated infrastructure construction has seen a flood of contractors and permanent workers move to Whyalla, placing unprecedented demand on local housing and accommodation providers. The unavailability of suitable housing is delaying major projects and forcing workers to either Fly In and Fly Out and/or Drive In and Drive Out; not the ideal social solution and detrimental to maximising local economic benefit of growth.

Whyalla has a legacy of public housing, either still owned by the state government or divested to private ownership) that over past decades have fallen into disrepair and requires redevelopment. Urban renewal of existing houses together with new housing development is required to build a mix of housing to provide for those seeking to buy their first home, or change homes (upscaling) or wanting to invest in housing, and also cater for those moving permanently to Whyalla for work or lifestyle choices

For a locality like City of Whyalla, we need to 'lift and shift' some of RenewalSA's learnings from metro Adelaide mixed use developments such as Roma Mitchell, Lights view, Tonsley (Industry), Lochiel (eco) , Oakden, and Brompton (Industrial to Urban Renewal), and position this type of development in a regional city.

Use of emerging materials and construction technologies such as prefabricated CLT materials should be utilised where tradition 'bricks and mortar' housing cannot be constructed in a timely or cost efficient manner.

Whyalla's existing social and affordable housing is mostly tired and does not generally meet contemporary living standards. More renewal and infill is required and at a greater pace. The pipeline projects that are at or near development assessment will conservatively add 4,000 construction related workers to Whyalla with around 810 ongoing workers required – current vacant workforce positions available in the city is in excess of 100, with housing cited as the prime reason it is difficult to attract and retain suitable skilled workers.

The City of Whyalla believes this situation requires immediate escalation for all three tiers of Government to address and respond to these specific conditions.

Fortunately, the State Government owns significant land holdings within the City of Whyalla, most of which is in the care and control of Council. Much of this land was previously dedicated for land uses that are no longer relevant (e.g. former Pony Club site (see below), Former Horseracing, Former Edward John Eyre High School site, Former Whyalla High School site) and/or never been developed (e.g. Kloeden Reserve).

In short, there is an abundant amount of vacant land available that could be used to enable residential development – we need the State Government to release a number of these sites to market in a manner that generates market interest in integrated mixed use developments, and also to address the SA Water network limitations that will inhibit development (see comments under Question 3).

Like many regional towns and cities, Whyalla also has a shortfall in independent living, over 55 retirement village and aged care accommodation that supports ageing in place. With an aging population, this shortfall is only going to become more exacerbated over the next 20 years.

### *Consultation question 9*

*How can we improve public transport services across Adelaide and outer metropolitan areas to encourage greater patronage?*

The question should read;
*How can we improve public transport services across Adelaide and broader South Australia, so as to encourage greater patronage and remove a lot of vehicles off (regional) roads?*

The government needs to invest in the restoration of regional rail networks between regional centres.

The rail services should ideally be fast passenger trains, powered by hydrogen engines, that are manufactured in South Australia.

A trial to be run between Whyalla - Port Augusta - Port Pirie - Adelaide would be a great beginning. The track exist, the technology exist, even a Spanish hydrogen train manufacture has indicated a willingness to run the trial. Why would we not jump at this opportunity, even from a tourism perspective let alone the huge demand that will come with local major projects? (Refer also comments under Question 2).

### *Consultation question 10*

*What investments would support a more efficient and productive health system that meets our growing and changing needs?*

The provision of essential workers accommodation/housing in regional centres to accommodate medical and allied health professionals. The housing solutions need to be tailored to suit the workers that need to be attracted. Whyalla has a unique opportunity to support multi story serviced accommodation in a number of key locations within our city (for example, adjacent the University of SA campus, the main street precinct and foreshore precinct).

Whyalla Hospital and University of SA/Adelaide facilities should also be 'geared up' to become an accredited tertiary teaching hospital facility/locality, to encourage more medical, nursing and allied health staff being trained in region. With the current planning for the merger of University of South Australia and Adelaide University underway, now would be the time to plan for building the academic capacity to deliver the training of junior medical/dental/nursing/allied health staff in region through the Whyalla Hospital and the (current) University of SA Campus. The opportunity to target international students to immigrate directly to Whyalla to obtain their medical qualifications would contribute to both attracting and building the workforce needed within the health sector – particularly within regional SA. UniSA research also confirms that 87% of students that study in region stay in region.

In line with the vision of a 'three city State', more residents living within regional SA would then be able to access more services in region, reducing the need for patients to travel to Adelaide to access services and improve health and wellbeing outcomes for people living in regional SA.

### *Consultation question 11*

*How can infrastructure support improved education and skills outcomes for South Australia?*

Local schools, TAFE's and Universities need to play a strong active role in the actual 'on the ground' construction of local infrastructure projects. Partnerships with the private sector need to be strengthened and tender documents need to spell out very clearly the expectation that tenderers must articulate how, if they are the successful tenderer, the business will utilise and engage with local education and skills training students to add value to the projects and the skills and education of the students.

A partnership opportunity could be developed to strengthen curriculums based on real world feedback from the infrastructure builders working with the education and skills based training providers.

The Former Whyalla High School (see below) should be repurposed to be a Centre of Excellence supporting hydrogen and renewable energy, green mining, green steel production, HILT CRC research, and educational activities associated with our state's transition to Net Zero.

City of Whyalla is an affiliate member of the Adelaide University led Heavy Industry Low-Carbon Technology Collaborative Research Centre (HILT CRC). HILT- CRC is Australia's leading collaboration, transitioning broader heavy industry to a low-carbon economy and will develop and demonstrate the technologies needed to grow Australia's industrial green economy, unlocking potential value of $48.7 billion in annual revenue and $92 billion in investments, (whilst mitigating CO2 emissions).

The Centre of Excellence is to include facilities supporting Hydrogen related Research, Education, Technology and Industry Application, as well as facilities supporting schools/visitors/public members to better understand hydrogen – its production, use, and transport/export, and community support and awareness of measures being undertaken with SA to reduce carbon emissions (particularly from steel making and mining) and transitioning to a carbon neutral future economy.

With the current planning for the merger of University of South Australia and Adelaide University underway, now would be the time to plan for building the academic capacity to deliver the training to the engineering and technical professionals in region, linked with local industry (e.g. GFG's Green steel Academy) and the (current) University of SA Campus.

The opportunity to target international students to immigrate directly to Whyalla to obtain their engineering and technical qualifications would contribute to both attracting and building the workforce needed within the renewable energy, resources and green steel industries. UniSA research also confirms that 87% of students that study in region stay in region.

***Consultation question 12***

*How can we sustainably grow these sectors to realise greater benefits for visitors and residents?*

The City of Whyalla has for a decade adopted the strategic objective to consolidate its sport and recreation assets and co-locate them within the central part of Whyalla, in order to maintain them at the highest possible standard and fit for community purpose whilst responding to evolving trends and enabling growth.

Whyalla's Sports and Leisure Centre was built in 1973 and is now at end of its useful life. Similarly, many of the city's sporting facilities are 'tired' and no longer meeting user needs. The development of a multi-purpose hub facility within the central precinct that is of a regional service standard, with integrated play and other passive forms of recreation as well as programmed sports usage, would play a key part in revitalising and future proofing Whyalla.

The fabric of Whyalla must change from tired to new. If the City is to attract a 15 to 25% increase in population and be competitive with Greater Adelaide housing developments of the north, east and south then its services and liveability standards need a marked improvement.

A community hub, sport, and recreation precinct within the evolving CBD/Civic precinct of Whyalla will complement:

- The new Whyalla Secondary College with the opportunity to provide connections between the sites
- Potential new high-density housing zones surrounding or even facing the site to encourage further population growth.
- Improved future walkable connections surrounding the site and possible bus interchange connecting the greater City of Whyalla to Westlands and other Retail, TAFE, the University and Library facilities.
- Stormwater management within and connecting to the broader stormwater schemes.

With the changing population demographic, increase in need for sports provision and surrounding modifications to land use, the two land portions represent a highly valued source of open space for the City. Key aspects that should be reviewed with the desire to future proof the park usage are as follows:

- Increasing function, quality and multi-use opportunities
- Shared facilities for the existing/relocating sport clubs
- Improved community offering such as
- Satellite size skate and/or BMX track
- Regional size play space
- Informal sports open space
- Facilities that cater for high-level competitions
- Water Sensitive Urban Design to underpin entire redevelopment with site forming a critical strategic landholding for stormwater management
- Residential development
- Key connections to surrounding future land uses
- Key connections to existing City

### *Consultation question 13*

*How can we think differently about infrastructure investment to support equitable access and a more inclusive society?*

The development of infrastructure tender documents could include invitations to the public to submit complementary projects that add value to the infrastructure design and purpose.

For example. The upgrade and extension of the Port Bonython Jetty should include additional infrastructure to support and protect the adjacent Giant Cuttlefish sanctuary and associated tourism operations to safely sperate and allow tourism boating to coexist and operate in parallel.

### *Consultation question 14*

*What are the opportunities for infrastructure investment to accelerate attainment of the Closing the Gap targets?*

Opportunities to involve First Nations people in any productive capacity, the awarding of scholarships to undertake trade training, or support to obtain ticket, certificates training, need to be offered on each project.

The proponents of infrastructure builds could be required to demonstrate in their tender submissions how they will engage and support local First Nation communities.

### *Consultation question 15*

*What infrastructure investments will support industries to transition to a global net zero future?*

Simple access to cost effective alternate fuels, including the transition from natural gas to green hydrogen.

Investments in local hydrogen storage and building of a network of green hydrogen refuelling stations across South Australia.

The construction of infrastructure to support hydrogen fuelled transport by rail and or airports to encourage the conversion of regional operating aircraft to hydrogen fuelled engines.

The mentality of 'build it and they will come' certainly does apply to infrastructure builds. This may require attention to rebuilding regional rail networks using locally sourced green steel, to run hydrogen fuelled hi-speed passenger and freight trains. Regional Airports should be funded and supported to build Air Taxi operational facilities.

### *Consultation question 16*

*How do we maintain an affordable, reliable and secure energy system through the energy transition?*

To maintain an affordable, reliable and secure energy system, the system should remain in public ownership.

### *Consultation question 17*

*What are the most significant challenges for decarbonising transport and how do we address them?*

The need to transition to non-fossil fuels, particularly EV's and Hydrogen Fuelled vehicles.

Need EV charging stations and hydrogen refuelling stations rolled out across the state and connected to interstate refuelling networks.

Need enabling legislation, regulation and infrastructure to support e-air taxi's/drones.

### *Consultation question 18*

*What action is needed to achieve a circular economy in South Australia?*

All products and materials used in any government tendered job, or project must be recyclable or enabled to be re-used. This must be clearly communicated in all tender bids submitted to government.

To address the tyranny of distance and the cost of transportation, there should be mini MRFs located in regional South Australia to remove from the general waste stream materials that can be reused, ideally within region.

More research and investment into developing products/processes that utilise recovered materials from the general waste stream.

More 'value' should be placed on reusing waste material from various processes as opposed to considering these materials as a necessary cost of a process. For example, salt harvested from the hyper saline waste water from desalination could be used in other industrial processes and/or used to de-ice roads overseas. Similarly, the decommissioning/salvage and recycling (DSR) of navel vessels could provide scrap steel to be used in steelmaking. Whilst there is a cost to establish such processes, there are benefits (including economic and environmental) to be derived.

There is a symbiotic relationship and circular exchange opportunity that exists between the production of hydrogen and green energy through electrolysis and the operation of a desalination plant. As the State Government is doing/coordinating the planning and investment in both the Hydrogen Jobs Plan and the Northern Water Supply Project, these exchange opportunities should be maximised/leveraged as far as possible.

### *Consultation question 19*

*What measures can be taken to enable the infrastructure industry to decarbonise?*

The scoping and criteria of infrastructure projects could outline essential requirements that the carbon footprint of each infrastructure project needs to be continually measured and reported on during the infrastructure build, with the aim to deliver low to zero carbon footprint across the project. The carbon footprint of the project needs to be a significantly highly rated aspects of any decision making matrix developed to determine the best tender received.

Green hydrogen produced within regional SA needs to provided via a pipeline or transported to industrial and manufacturing businesses located in metropolitan Adelaide, particularly areas such as Salisbury and Playford, so that it can be utilised locally to manufacture green products.

### *Consultation question 20*

*How do we better account for the impacts of climate change in our infrastructure, to support improved resilience?*

The scoping and criteria play such a significant role in delivering what is critical to the government, the community and the project. Each infrastructure project needs to call for tenderers to outline the Climate change impacts of the infrastructure, as a significant risk factor and how such risks will be addressed throughout the project.

Better planning is also required to avoid placing infrastructure where it may be subject to natural or man-made disasters and/or ensuring appropriate resilience is built into the infrastructures design.  A simple example of this was the new Whyalla Jetty being built 1.5 metres higher than the previous jetty to account for future sea level rises that are projected to occur over the long life of this asset.

### *Consultation question 21*

*What are the critical resilience issues that South Australia needs to address?*

Water security
Green Power supply
Greening of towns and cities
Telecommunications
Protection from and mitigation of the adverse impacts from climate change.
Roads (flooding event demonstrated how reliant we are on road freight routes
Regional airports

### *Consultation question 22*

*How can we better realise the resilience benefits of green and blue infrastructure to inform infrastructure planning?*

The Australian Government is a signatory to the 18 UN Sustainability Goals. Infrastructure planning could address each of the 18 goals within the planning. The actions required within the infrastructure should be measured and reported for each of the 18 goals, which in turn will spell out the resilience benefits of both green and blue infrastructure.

### *Consultation question 23*

*How can government and industry work together to support the supply of skilled labour needed to deliver a transparent infrastructure pipeline?*

The co-ordination and management of the starts to (private and Public) major projects to enable the sharing of trade skilled workers, the integration of apprenticeship workers and the smooth transition of workers from one major project to another. Both government and industry need to invest more into education, training and up skilling workforce.

The recognition of skilled tradespeople from overseas, or at least offer to pay for any additional training or education required to recognise existing skills and experience.

Better reporting by project proponents (public and private) of future workforce needs, in terms of quantum, skills needs and timing is necessary in order to understand what the workforce requirements are. It is suggested that the RDA's maybe in the best position to collate and report this data. Greater co-ordination is also required across education and training providers to ensure they are offering what is needed by workers/employers and 'in region' resources are required to 'case manage' the support provided to the more 'hard to employ' people, as well as curate and triage the connection between available workers and businesses.

### *Consultation question 24*

*How can we maximise the productivity benefits of digitising our infrastructure?*

Smart technologies need to be built into all infrastructure projects during the initial planning processes, not bolted on after the projects finishes.

### *Consultation question 25*

*How can government continue to encourage collaboration and innovation in procurement?*

All procurement criteria must outline green credentials of suppliers need to be submitted with tender responses and the 'green' outcomes of a project must be included in any and all tender submissions, making it crystal clear the winning tender will not just be based on cost.

### *Consultation question 26*

*What are the funding and financing options government should consider in future, to ensure its infrastructure program remains affordable and sustainable?*

State and Federal governments should be more prepared to fund green transition projects as partners in the project, requiring taxpayer investment to be paid back interest free, however a percentage of any profit should be paid to the government.

Offtake agreements with, and/or joint investment from, the private sector.

Public/private partnerships – obtaining public value from a project/investment that also generates a ROI for the private sector.

Regional Precinct Partnership Proposals with joint investment by the Federal, State and Local Governments, together with the private sector.

[End]