



# **Greater Adelaide Regional Plan Discussion Paper Submission**

**Local Government  
Association**

**November 2023**

# Table of contents

<b>Executive Summary .....</b>	<b>4</b>
<b>Introduction .....</b>	<b>4</b>
<b>Background .....</b>	<b>5</b>
<b>Comments .....</b>	<b>6</b>
1 – Guiding Outcomes in the GARP .....	6
LGA Comment .....	6
Recommendation .....	7
2 – Housing .....	8
LGA Comment .....	8
Recommendation .....	9
3 – Living Locally .....	11
LGA Comment .....	11
Recommendation .....	12
4 – Employment .....	13
LGA Comment .....	13
Recommendation .....	14
5 – Infrastructure .....	14
LGA Comment .....	14
Recommendation .....	15
6 – Waste Management and Associated Infrastructure .....	17
LGA Comment .....	17
Recommendation .....	17
7 – Urban Greening .....	17
LGA Comment .....	17
Recommendation .....	18
8 – Climate Resilience .....	21
LGA Comment .....	21
Recommendation .....	22
9 – Protection of Primary Production Land .....	23

LGA Comment .....	23
Recommendation .....	24
10 – Councils adjacent to the Greater Adelaide boundary .....	24
LGA Comment .....	24
Recommendation .....	24
11 – Appearance, Form and Implementation of the GARP .....	25
LGA Comment .....	25
Recommendation .....	25
12 – Recognition of Traditional Custodians.....	26
LGA Comment .....	26
Recommendation .....	26
13 – Delivery of the GARP .....	26
LGA Comment .....	26
Recommendation .....	26
<b>Summary .....</b>	<b>27</b>

## Executive Summary

To deliver good planning outcomes for the Greater Adelaide Region the Greater Adelaide Regional Plan (GARP) will need to provide a detailed and integrated approach to housing delivery, economic growth, infrastructure provision and climate change. In response to the Discussion Paper released on the GARP the Local Government Association (LGA) provides this submission that includes **55** recommendations with an emphasis on:

- infrastructure planning that is funded and integrated with strategic planning outcomes;
- integrated transport planning including a detailed public transport network that provides linkages to key growth areas;
- access to social infrastructure;
- alignment with key State strategic goals such as the net zero emissions targets, Resilient Water Futures and the Urban Greening Strategy;
- design quality and environmental sustainability being prioritised in new development;
- mechanisms and models to improve access to and affordability of housing;
- recognition of the importance of urban greening and its contribution to the amenity of the built environment; and
- planning for the future climate of Greater Adelaide in response to climate change.

The LGA strongly encourages the State Planning Commission (Commission) and the Department for Trade and Investment (DTI) to collaborate with the LGA and local government sector on the development of the draft GARP. Further investigations undertaken to support the GARP should leverage councils local knowledge and experience. To support DTI, the LGA can be the conduit to local expertise.

## Introduction

The GARP will be a vitally important document for guiding the future growth of Adelaide. The GARP will replace the 30-Year Plan for Greater Adelaide and will determine how urban growth will be managed till 2050.

The final outcomes in the GARP will guide and impact all local government areas in Greater Adelaide. Given the importance of the GARP to the long-term future growth, the LGA appreciates the importance of providing early feedback to the Greater Adelaide Regional Plan Discussion Paper (Discussion Paper).

The LGA commends the Commission and DTI in producing a Discussion Paper that is easy to understand, thought provoking and uses a high level of foresight to support anticipated growth in Greater Adelaide. The sector is generally supportive of the desired outcomes in the Discussion Paper with a high level of interest in the finer detail, particularly how outcomes are going to be delivered in collaboration with local government.

In preparing this submission the LGA has engaged with its members to ensure its submission reflects a whole-of-sector view. Feedback from member councils has been obtained through a survey and five

workshop sessions. The feedback received through the engagement has been used to inform the LGA's submission.

From the feedback received it was evident that for Greater Adelaide to deliver a pleasant, convenient and climate resilient place to live, it will take attainment of all aspects of the GARP underpinned by strong and coordinated infrastructure planning and delivery.

The LGA's submission has been endorsed by the Greater Adelaide Regional Organisation of Councils (GAROC) and was approved by the LGA Board of Directors on the 17 November.

## Background

In August 2023 South Australia's peak bodies representing local government, planning, development, conservation, research and not for profit health, housing and social services sectors attended a roundtable.

The roundtable, which included the Honourable Nick Champion MP, Minister for Planning and representatives from the State Government, explored the barriers and opportunities to increase housing affordability and deliver future development in the Greater Adelaide Region while maintaining greening, liveability and other neighbourhood amenities.

The five key principles agreed between the peak bodies at the roundtable were:

- A diverse housing system – all South Australians have a right to quality housing that is well located, offers a range of dwelling types, is accessible and affordable.
- A balanced combination of master-planned greenfield development and strategic infill to enable more people to live close to the facilities and amenities they need.
- A well-designed housing system which is planned and valued holistically to recognise the vital role housing design has on community health, wellbeing, economic productivity and the importance of long-term affordable running costs and climate resilience.
- A flexible and agile housing system with the right legislative and policy settings to ensure land supply with a diversity of tenure types and funding approaches.
- A focus on the right capacity and capabilities by ensuring adequate trades, planners, project managers and materials.

The LGA has prepared this submission with these principles in mind and is committed to continuing to work with DTI to support the drafting of the GARP.

# Comments

## 1 – Guiding Outcomes in the GARP

The Discussion Paper provides four outcomes that are intended to guide how Greater Adelaide should grow, they are:

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

### LGA Comment

The sector generally agrees with the guiding outcomes proposed in the Discussion Paper. Feedback received by the LGA has included additional considerations that should be factored into the GARP to achieve these outcomes:

#### A greener, wilder and climate resilient environment

There is strong support to provide greener environments. However, change to current policies will need to be made to ensure the outcomes can be achieved in current and proposed residential densities in built-up areas. Aligning planning policy with these goals may be difficult, as policies favouring fast-tracking greenfield developments may contradict the intent of creating a greener environment. There needs to be stronger policy in relation to protecting existing vegetation and recognition that tree canopy targets cannot be met without trees on private land. Further commentary in the GARP to identify the scope of the outcome and how it should be applied in built up urban areas compared to semi-rural areas in Greater Adelaide is needed to ensure alignment with the Urban Greening Strategy.

Climate resilience is an extremely important outcome and one that should be given significant weight in the GARP, with particular focus on climate mapping that would, amongst other things, identify areas impacted by rising sea level and ensure housing built today is designed to accommodate climate change and the forecast environment in 2050 and beyond.

#### A more equitable and socially cohesive place

This is an important outcome for the GARP. Further details outlining social infrastructure throughout Greater Adelaide is needed for areas that are currently lacking in social infrastructure. Social disadvantage needs to be recognised and built into the GARP specifically detailing areas that lack appropriate access to public transport, affordable housing, tree canopy, housing with an energy star rating of 3 stars or less etc. If satellite cities are incorporated into the GARP (i.e. Murray Bridge) quality rail connection is needed to reduce reliance on cars and to provide a similar level of service that is provided within inner metropolitan Adelaide.

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

Economic growth will be critical to achieving many of the outcomes in the GARP and, accordingly, should be given appropriate focus. The economic outcomes in the GARP should align with the South Australian Economic Statement. The GARP should deliver strategically located land supported by infrastructure (such as freight route) to ensure future employment outcomes can be achieved.

### A greater choice of housing in the right places

The GARP should include a greater focus on social and affordable housing that delivers choice. Achieving good design outcomes that enhance amenity will also be important. Attainment of this outcome will also require consideration of mobility and transport integration, emphasising measurable criteria for determining "right places" for housing with infrastructure provision ahead of demand. The focus should not just be on housing location but also address:

- the importance of local living and working;
- mobility;
- efficient and eco-friendly public transportation that contributes to integrated transport; and
- well-designed, pleasant spaces to live.

These factors could be assessed and achieved by providing guidelines for precinct structure planning of specific areas.

### **Recommendation**

The LGA supports the four outcomes and considers that they can be strengthened and supported by the GARP setting out a strong policy position and implementation plan. The following could be included in the GARP to support the outcomes:

1. Greater consideration of the relationship between housing outcomes and greening/green spaces with policy seeking to achieve a better balance between built form outcomes and green spaces. This could include broadening of the regulated and significant tree legislative framework to provide greater protections to existing trees.
2. Greening targets will need to include the retention of existing vegetation and the provision of new/additional vegetation in new development that can be strengthened through supportive planning policy.
3. Built form to open space ratio be reviewed and incorporated into built form outcomes to provide larger spaces for greening and land that is open to the sky, particularly in higher density areas where smaller allotments are likely to occur. This will also contribute to household and neighbourhood amenity.
4. Greater emphasis on design quality and housing design that encourages built form outcomes that are environmentally responsive and consider the long-term running costs for dwellings (rather than the short-term building costs).
5. Land use and infrastructure planning should be integrated to ensure outcomes are achievable. For example, key growth areas are supported by an integrated transport network that promotes and encourages the use of public transport or pedestrian modes of travel. An example of an integrated land use and infrastructure planning approach in the Draft Shaping SEQ 2023 Update that includes budget allocation and forecasts delivery to realise projects.

6. Mapping that shows land that will be impacted by sea level rise based on 2090 climate data.
7. Greening targets in the GARP are supported, but should acknowledge that the delivery of greening will be different for different areas of Greater Adelaide. For example, greening in the City of Adelaide will be different to greening in an outer metropolitan suburb due to land availability. Targets should be set for greening, an example is the 3-30-300 rule, which seeks 3 trees to be visible from every home, 30 percent tree canopy cover in every neighbourhood and 300 metres from the nearest public park or green space. A measure like this could be used and adapted for specific areas.
8. Land use planning that acknowledges land as a finite resource and makes provision for productive land (food producing), waste management, services (hospitals, schools, supermarkets, emergency services etc), recreation and sporting facilities and open space etc.
9. Measurable targets should be set to ensure that quality open space, for recreation, sporting fields and greening and the like, is being provided.

## 2 – Housing

The Discussion Paper forecasts that an additional 300,000 homes will be needed in Greater Adelaide by 2051 with anticipated residential growth to be achieved through a mixture of greenfield, strategic infill (larger allotments) and general infill (one into two/three/four/five).

### LGA Comment

The sector understands that the population of the State will grow and that provision needs to be made to support this growth. The general propositions for future delivery of housing outlined in the Discussion Paper are supported with the sector indicating a preference to greenfield and strategic infill over general infill. For councils, particularly those where growth investigation areas are identified, questions remain about how housing will be delivered, particularly in relation to infrastructure.

It is not clear in the Discussion Paper if the methodology for the forecast growth scenarios factors in property ownership for rentals or Air BnB that are used for negative gearing. The LGA considers that the growth scenarios should factor in additional dwellings needed to support this type of ownership if this has not been taken into account as this can put pressure on housing affordability.

Along with being appropriately located, housing also needs to be fit for purpose and climate resilient to ensure it will last into the future. For example, new housing should avoid expanses of dwellings with dark roofing and no tree canopy cover as demonstrated in **Figure 1**. The LGA notes that the new seven-star rating (that will come into operation from 1 October 2024) will go some way to addressing environmental sustainability of dwellings constructed in the current climate, however the climate will be different in several decades. The GARP should recognise this and include and emphasise policies for design quality that are adaptable to the changing climate.



**Figure 1** New housing in Mount Barker with dark roofing and little to no tree canopy – a design outcome that should be avoided in the future.



## Recommendation

The LGA supports the successful delivery of well designed, climate resilient and conveniently located housing. To achieve this, the following matters should be given further consideration in the GARP:

- 10.** There is no point building houses that are not fit for purpose, particularly for a changing climate, and expensive to live in. A greater focus on design quality is needed to ensure the amenity and climate resilience of future housing. It is recommended that this be accompanied by the introduction of stronger design policies into the Planning and Design Code.
- 11.** Housing affordability should be looked at in broader terms than the current model (being an opt in model to provide 15 percent affordable housing in a new development at a predetermined price point) that does not work. The affordable housing model needs to be reviewed along with models for social housing and build to rent being encouraged to provide greater access to affordable housing options.
- 12.** The anticipated housing demand in the Discussion Paper is based on a high growth scenario. The GARP should plan and prioritise where housing should occur in the event the high growth scenario does not come to fruition. The prioritisation of growth should take into account the availability of infrastructure, open/recreation space, public transport network, services and have regard to emission targets, climate resilience and protection of land that serves an important purpose such as food production.

13. Diversity in housing type needs to be more strongly enshrined in policy to reflect changing household demographics, concepts of aging in place and true diversity in housing options being delivered in the same geographical location. For example, future greenfield/master planned developments could be required to meet quotas on different housing types, with policy outcomes that influence the market drivers.
14. Innovation in planning and built form outcomes should be incentivised for sustainable development, build to rent housing, community housing and adaptive reuse.
15. Policies that incentivise amalgamation of land along corridors, higher density zones and growth areas to encourage better built form outcomes. The policy should include a minimum allotment size as a measurable target to access the incentives.
16. It is acknowledged that increasing densities in inner metropolitan/built up areas, such as along corridors, is needed to accommodate the growth being forecast. However, further investigation into corridors is needed to identify where corridors have worked and have not worked. This would then enable identification of corridors with similar characteristics to be targeted for uplift.

Feedback received by the LGA was that some corridors had worked and some has not worked. For example, Henley Beach Road and ANZAC Highway were examples given that had not worked, primarily due to fragmentation of land ownership, lack of suitably sized allotments that can accommodate a development and lack of amenity (i.e., six-lane road). Churchill Road in the City of Prospect was given as an example that had been more successful and been able to deliver consistent built form outcomes, with good amenity for residents and access to local conveniences.

17. In addition to corridors, the sector considers that more investigation is needed to identify strategic infill sites and nodes where higher dwelling densities could be more easily accommodated. For example, shopping centres such as Marion, Arndale, Elizabeth could be planned for additional housing in the future and take advantage of the “air above” the shopping centre site, Chadstone in Melbourne may be worth investigating as an example of this. In some instances, strategic infill is preferred to corridors as it is considered these can be designed to deliver better built form and amenity outcomes.

### 3 – Living Locally

Living locally is being explored as a concept for the GARP to achieve the four guiding outcomes. Living locally is defined in the Discussion Paper to mean:

“...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.”

#### LGA Comment

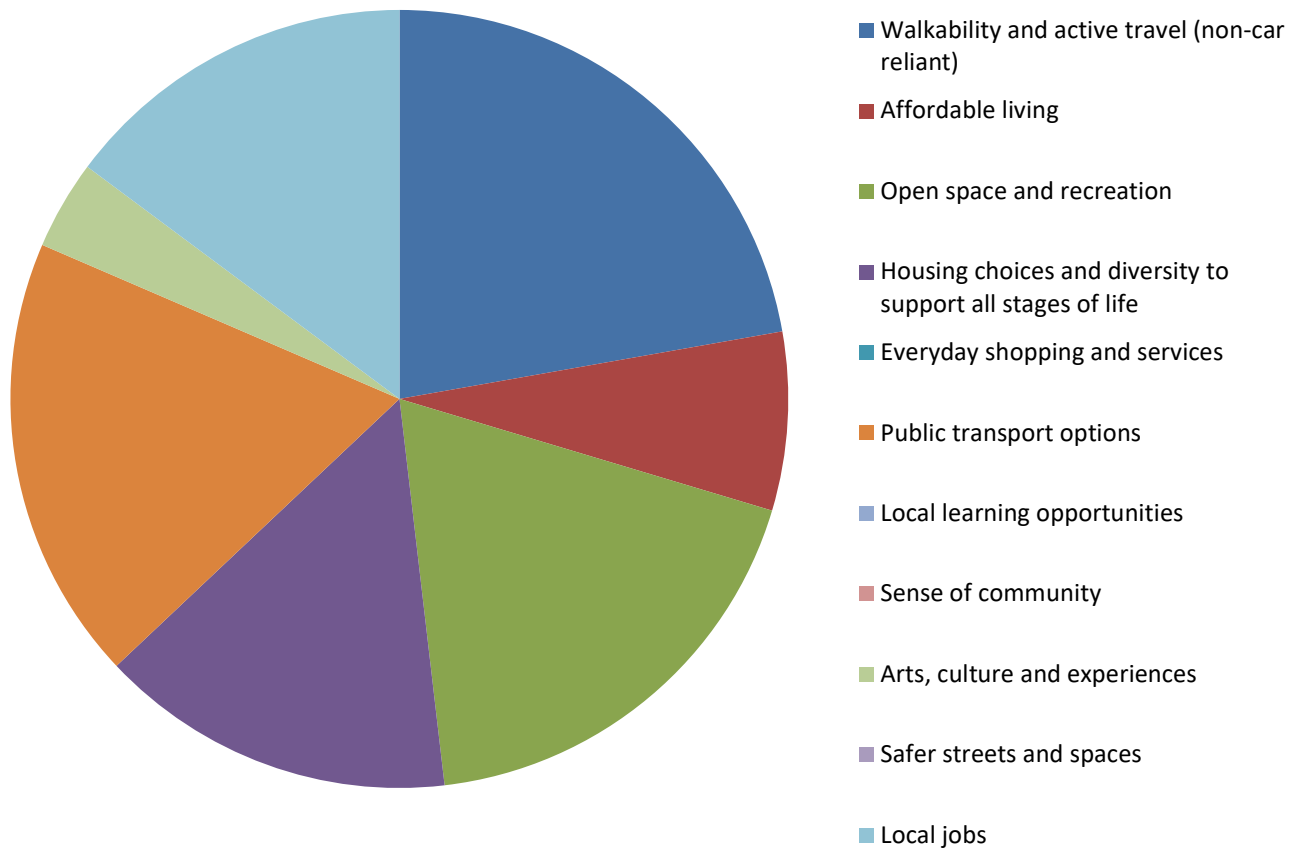
The concept of living locally has support and plays a key role in planning as it builds community resilience and consolidates infrastructure and services.

The sector is supportive of the living locally concept, however, has raised some concerns around how it is defined in the GARP and where it will be delivered. A clearer definition and consideration about its application will be needed to ensure it is an achievable outcome. Feedback received on the concept included:

- It will not be possible to achieve the concept in all parts of Greater Adelaide. Achieving the concept of living locally is likely to be more difficult in built up areas that lack space to provide local services or are in areas where certain Zones and Overlays apply that restrict mixed land uses. Also, the concept may be difficult to achieve in lower density areas that lack existing services or transport limitations.
- Increased population densities and improved walkability, public transport and connections will be needed to achieve the concept.
- The concept is at risk in areas that lack diversity in zoning. For example, the loss of employment/strategic employment zones that may support uses such as crash repairers, mechanics, storage and warehousing for trades etc.

One of the questions provided in the survey was “what do you think are the most important features of living locally”. Participants were asked to select three features from a list. A summary of the survey results is contained in **Figure 2**. Walkability and active (non-car reliant) travel, open space and recreation and public transport were the top three responses received. Notably having local jobs was not considered an important feature to the concept of living locally. The LGA consider it is worth excluding ‘work’ from the definition of living locally in the GARP as a person will change their job throughout their working life but are less likely to change their home. The LGA notes this approach has also been adopted in Victoria where it is recognised that people are still likely to travel for work.

**Figure 2** Feedback from Survey addressing the question “what do you think are the most important features of living locally?”



## Recommendation

The concept of living locally should be aspired to for Greater Adelaide, but to be successful may not be able to be applied as a one size fits all in the GARP. The following could be considered for the GARP:

18. How living locally is defined. In other places such as Victoria, the concept is based on a 20-minute round trip and excludes travel to work. It would be beneficial for the GARP to include what is in scope and outside of scope. For example, it could exclude certain services, specify targets for specific geographical locations (i.e., greenfield development) and be aspirational for existing built-up areas. It could also provide different criteria for achieving living locally for different geographical areas taking into account factors such as population density, existing services and infrastructure.
19. The GARP could include measurable targets to identify where the living locally concept is being achieved. The measurable targets can be used to prioritise activities to increase living locally outcomes.



- 20.** Recognising that public transport in Greater Adelaide is currently very different in its form and usage compared to most interstate cities, a detailed and integrated public and pedestrian transport network (**Figure 3**) should be included to support the concept of living locally. To support this there needs to be planning and funding to support sustainable transport in all its forms.

**Figure 3** Integrated transport example that separates pedestrians from cyclists and cyclists from cars with clear delineation of these spaces



## 4 – Employment

The Discussion Paper identifies that the GARP will support economic growth by ensuring employment land supply and estimates that there is currently 24-44 years of available employment land.

### LGA Comment

The LGA agrees that the GARP should support future economic growth of the State by ensuring suitable land is available for future employment land uses.

For every one person who lives in Greater Adelaide, 10 people travel to the Adelaide CBD for work and/or leisure. If this trend continues, a significant portion of employment will be city centric. The Discussion Paper is silent on the importance of the Adelaide CBD and its role in Greater Adelaide.

## Recommendation

Economic growth is an important inclusion for the GARP and it is recommended the following be considered:

21. In identifying suitable and available employment lands, the GARP should factor in where housing growth is likely to occur to ensure that employment land is available in proximity to housing growth areas. While the LGA does not consider it necessary for employment options to always be in close proximity to housing, some employment opportunities should be available to provide the choice of being able to work locally or in proximity to where you live.
22. Protection of employment lands in existing built-up areas will be important to supporting the concept of living locally. For example, in inner city suburbs employment zoned land is being acquired or rezoned to deliver infrastructure or housing. The GARP could identify strategically important employment lands in built up suburbs and protect this land from being rezoned.
23. Infrastructure and freight routes will be important for servicing employment lands. Employment land investigation areas should consider current infrastructure provision with priority given to areas with greater infrastructure provision. Areas with less infrastructure provision could be identified as second tier options for growth once more suitable employment land supply is exhausted.
24. The GARP should consider alternative and/or additional employment land investigation areas identified in conjunction with local government. For example, the LGA understands that there is infrastructure to support an employment growth area in Monarto East in preference to Callington, but this has not been identified as an investigation area in the Discussion Paper.

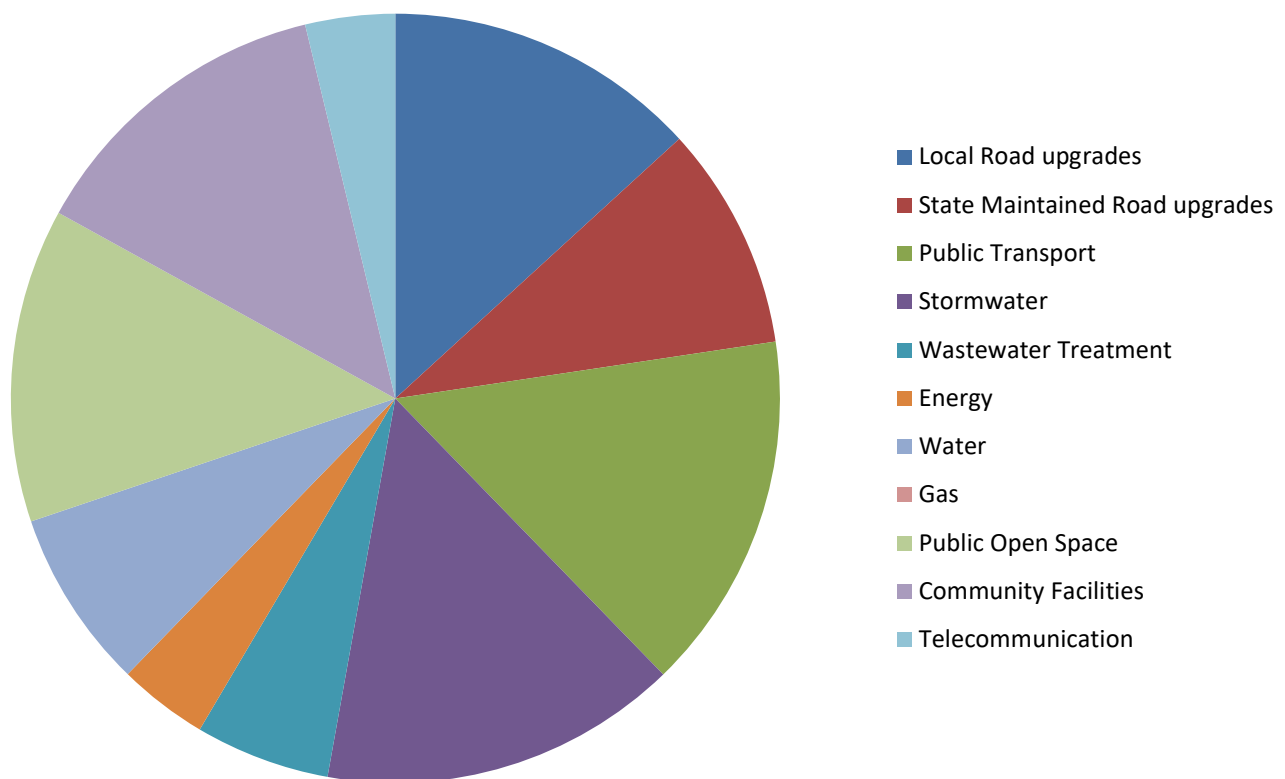
## 5 – Infrastructure

The Discussion Paper identifies that the availability and capacity of infrastructure to support growth varies between locations. Focusing new growth in areas where there are existing services and infrastructure is the best and most cost-effective option.

### LGA Comment

The LGA considers that the provision of infrastructure, both hard and soft, is critical to delivery of the GARP. The sector has overwhelmingly confirmed that infrastructure is a critical issue in delivery of development now and will be a key issue to delivering the growth anticipated for Greater Adelaide. Results from the survey showed that there are a vast array of infrastructure challenges with public transport, road upgrades, stormwater, public open space and community services identified as the most challenging (refer **Figure 4**).

**Figure 4** Feedback from Survey addressing the question “what infrastructure challenges exist in your council area?”



Presently infrastructure provision occurs in an ad hoc way with a lack of long-term infrastructure planning by service providers. In built-up suburbs where general infill is occurring at high rates, often tripling the number of dwellings in a street, developers make no direct contribution to the provision of infrastructure. Conversely, where a developer is delivering a master planned neighbourhood they often pay for all of the trunk infrastructure to service that development.

The residential growth investigation areas, satellite cities and employment land investigations areas will be critical to support anticipated growth. However, for these growth areas to be successful there needs to be infrastructure provision. In particular an integrated public transport network (preferably rail), freight by-pass, strong linkages and open space provision.

## Recommendation

To ensure anticipated growth is supported by infrastructure the LGA recommends the following be considered for inclusion in the GARP:

25. The LGA notes that Infrastructure SA has recently released the Discussion Paper on the 20 Year State Infrastructure Strategy (Infrastructure Strategy) and considers that the Infrastructure Strategy and the GARP should be closely aligned in order to be effective. Consideration also needs to be given to other long-term infrastructure plans being developed. For example, “Resilient Water Futures” being led by SA Water together with other State organisations and peak bodies to plan a secure, sustainable and resilient water supply for Greater Adelaide’s over the next 50 years.



26. To support and encourage alternative modes of transport the GARP should include a comprehensive transport network that includes:
  - a) a pedestrian friendly network that separates pedestrians from bicycles (and the like) and bicycles from cars (refer **Figure 3**); and
  - b) an integrated public transport network (preferably rail) that provides linkages to all areas throughout Greater Adelaide.
27. Detailed investigations should be undertaken in respect to existing community facilities, sporting fields, recreation spaces, health care providers, schools, cemeteries, emergency services facilities, waste management facilities and the like, with the GARP identifying where new social infrastructure may be needed in the future. This process could also include a review of existing facilities and their capacity to see whether they could be better utilised to support an increasing population. For example, whether school grounds could accommodate sporting facilities for use outside of school hours. Expansion of existing facilities or use of school grounds etc may be critical to delivering social infrastructure in built up areas. Investigations could be accompanied by population number thresholds that once reached would trigger the delivery of additional social infrastructure. A threshold for delivery enables flexibility in the delivery of infrastructure to respond to where populations are increasing.
28. Detailed infrastructure investigation to be undertaken for the identified growth areas, including engagement and collaboration with the growth area councils to ensure that future infrastructure can be delivered in a coordinated way.
29. Detailed infrastructure plans be included in the GARP that:
  - a) specify who will be responsible for the delivery and resourcing of infrastructure;
  - b) provide trigger points and timelines for delivery of infrastructure; and
  - c) are supported by infrastructure schemes that set out developer contributions to be made towards infrastructure provision.
30. The use of renewable energies at all stages of new development should be encouraged, facilitated and incentivised. For example, the use of electric vehicles during construction and the use of renewable energy, such as solar panels, to power development after construction.
31. Infrastructure delivery schemes, for local areas and Greater Adelaide, be developed in accordance with the *Planning, Development and Infrastructure Act 2016* in conjunction with Infrastructure SA and councils to ensure fair and reasonable developer contributions for greenfield, strategic infill and general infill are being made. With these contributions providing the funding to deliver infrastructure in accordance with the schemes such as larger stormwater pipes, playground equipment etc. Victoria has established infrastructure contributions that are supported by infrastructure planning to determine developer contributions. To facilitate this the Infrastructure SA charter should be amended to enable consideration of infrastructure at lower cost thresholds.



- 32.** The methodology for calculating infrastructure costs in respect to greenfield versus general/strategic infill needs to factor in costs to upgrade/retrofit existing infrastructure in built up suburbs that is currently at or exceeding capacity.

## 6 – Waste Management and Associated Infrastructure

The Discussion Paper provides very little detail in respect to Greater Adelaide's current or future waste management.

### LGA Comment

Waste and recycling facilities are not identified as an “essential service” under the *Essential Services Act 1981*. As such these types of facilities often face challenges in the current planning framework including challenges in the development approval process. Waste management infrastructure is essential for South Australia to maintain amenity in our suburbs, achieve the State's net zero emissions targets and to transition towards a more circular economy. Urban encroachment on facilities is a challenge faced by the industry and with the growth projected in the Discussion Paper this challenge is likely to continue and increase. The LGA considers that the GARP should include consideration of necessary waste management facilities, like landfills, that reflects the essential nature of this infrastructure in supporting the future growth of Adelaide.

### Recommendation

The GARP should reflect and enable strategic waste, recycling and resource recovery infrastructure by:

- 33.** Identifying appropriate locations for this infrastructure and ensuring the protection of land that is appropriate and available for waste management uses.
- 34.** Prioritising, encouraging and incentivising circular economy principles in new development and infrastructure for example, the use of recycled materials. This would also support the State's net zero emissions targets.

## 7 – Urban Greening

The Discussion Paper makes reference to urban greening targets and the development of a greening strategy for Greater Adelaide.

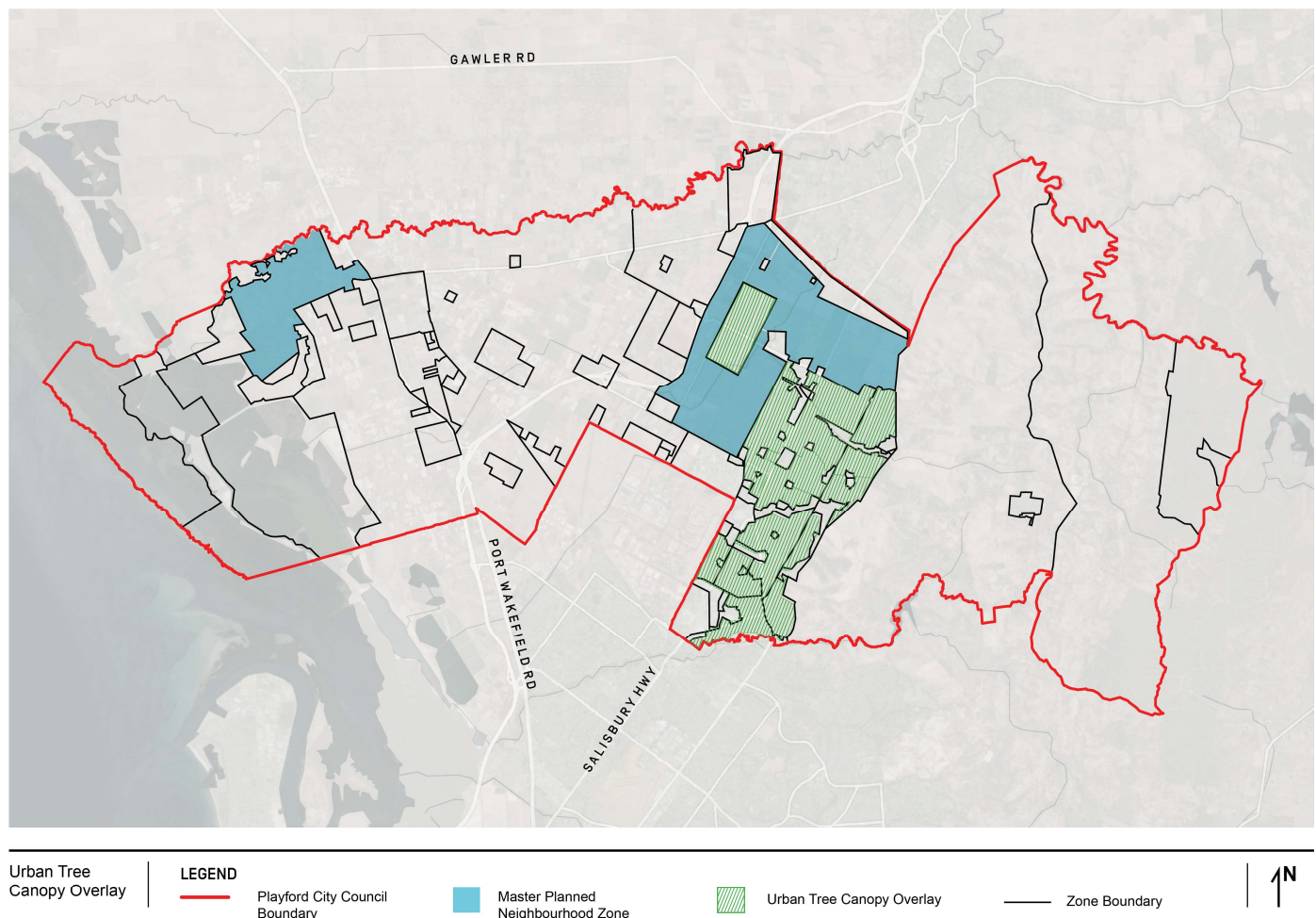
### LGA Comment

The sector considers urban greening, which includes trees and vegetation, to be a crucial tool to combat climate change, reduce heat island effects and achieve the State's net zero emission target. Greening also makes an important contribution to the amenity of our built environment.

The LGA supports greening and its contribution to climate resilience. In this regard the Urban Greening Strategy should work hand in hand with the GARP to achieve greening targets.

The LGA considers that currently there is a lack of legislative protections and policy in the Planning and Design Code to protect existing trees/significant vegetation and encourage greening, noting that the Urban Tree Canopy Overlay does not currently apply to Master Planned Zones (Refer **Figure 5**) and certain trees within 10 metres of dwelling or swimming pool are excluded from protections. The Regulated and Significant Tree Overlay does not apply to outer metropolitan areas that include growth investigation areas (it is noted that the Native Vegetation Overlay does apply in these areas).

**Figure 5** Urban Tree Canopy Overlay and Master Planned Neighbourhood Zone example from the City of Playford



## Recommendation

The GARP should provide greater recognition of the value of trees and how trees (existing and proposed) are to be incorporated into future built form outcomes, including by:

- 35.** Supporting green infrastructure outcomes such as utilising water sensitive urban design (WSUD) in development, for example wetlands for stormwater management (refer **Figure 6**) and greening along transport corridors, streets and laneways (refer **Figure 8**).



36. Policies that encourage and incentivise greening in building design including green walls and roof top gardens. This is particularly important for the CBD and other built up areas, as these areas will heat up due to climate change (refer **Figure 7**).
37. Including a greening target, for example the 3-30-300 rule (refer recommendation 7 above).
38. Aligning the GARP with the outcomes of the Urban Greening Strategy for Greater Adelaide (currently being prepared).
39. Planning policy that encourages social change around trees (i.e. shifting mindset from “trees can be removed to support development” to “trees should be retained and development should work around trees”). This could include a legislative framework that places a greater dollar value on existing trees and restriction on tree removal, such as the recommendations in the ERDC Interim Urban Forest Report, providing greater area for tree planting in new development (by reducing building footprints on allotments) and stronger requirements to provide larger landscaped areas within new development.
40. Exploring opportunities for additional greening at every opportunity along road corridors in public spaces. In new development require road reserves to be wider to enable additional planting such as those demonstrated in **Figure 8**.

**Figure 6** Example of urban greening for water sensitive urban design wetlands. This type of green infrastructure can also be utilised for public open spaces and pedestrian linkages.





**Figure 7** Example of urban greening in high rise building design (greening of balconies). Roof tops can also be utilised for greening in buildings.



**Figure 8** Example urban greening in streetscapes. Landscaping can be used to delineate spaces for different uses within a street (i.e. separation of pedestrians, cyclists and cars)



## 8 – Climate Resilience

The Discussion Paper recognises climate change as something that will impact all areas of society. The future prosperity and the liveability of Greater Adelaide, the health and wellbeing of communities and resilience of the built and natural environment will depend on how well we adapt to and mitigate the impacts of climate change. The Discussion Paper also identifies changes to the State's climate including that it is becoming hotter and drier, and experiencing extreme events like heatwaves, bushfires and flooding, which are increasing in frequency and intensity.

### LGA Comment

The LGA considers that the GARP needs to be specific about the key mechanisms that will address climate change. In particular:

- the role of planning in achieving net zero emissions;
- focus on operational life-cycle costs for more efficient homes, not just the up-front building cost;
- where we build and what we build;
- that homes protect and promote good health in the face of extreme weather;
- mitigating risks from hazards;
- the importance of urban greening in mitigating heat; and
- water security as South Australia's climate becomes hotter and drier.

The South Australian Government has set goals to reduce South Australia's greenhouse gas emissions by more than 50% below 2005 levels by 2030, and to achieve net zero emissions by 2050. These targets need to be delivered during the life of the GARP. Stronger alignment is therefore needed between the GARP and the net zero emission targets to support and enable the transition to net zero.

In deciding the location of new neighbourhoods (infill and greenfield), the GARP needs to consider the likely climate conditions a century into the future. High-confidence climate data is available up to the year 2090 (refer ["Guide to climate projections for risk assessment and planning in South Australia | 2022"](#)). In preparing the GARP, consideration needs to be given to whether houses will still be liveable, insurable, comfortable, healthy and affordable to live in or regularly exposed to flood, bushfire and heat risks in the future.

The cost of housing and associated cost-of-living pressures will continue to be an issue in the near to medium term future. While reducing the upfront purchase price of housing is important, ignoring ongoing operational cost is short-sighted and does not deal with the pressures many homeowners experience in relation to ongoing utility costs, particularly heating and cooling.

Climate hazard exposure also needs to be adequately addressed in the GARP to consider climate risk, and account for events such as heat hazard exposure, flood risk, sea level rise, storm surges, higher peak rainfall events, increased bushfire risk and extreme storm risk. This consideration acknowledges that the homes we build today are going to be operating under a different climate in the future and need to be adequately designed, constructed and assessed to account for this.

Greater Adelaide has a large footprint and low population density, making it challenging to service through public and active transport routes. As such, Adelaide is heavily car-dependant and this has been a driver of the urban form. The function of moving cars around, quickly, safely and directly, along with the associated storage required at end of trip, continues to directly influence land use planning outcomes. It is unlikely that Adelaide will become less car-dependant in the next three decades without

substantial infrastructure investment. Strategic infill sites have the greatest opportunity to provide increased densities and utilise existing and/or support new infrastructure to reduce care dependency. A good example of this is the Outer Harbour Greenway that runs from the edge of the City of Adelaide, along the rail line to Outer Harbour. Along the route are a number of urban renewal projects including Bowden, Gasworks precinct, Kilkenny, St Clair, Woodville Road, and the housing development completed and underway around the inner harbour.

## Recommendation

The LGA considers that planning will play an important role in addressing climate change and achieving the State's emission targets. The GARP should take the following into consideration to address climate resilience:

- 41.** Available climate data should be considered to minimise the vulnerability of future development from climate change. This could be achieved through mapping current climate data and identifying areas that are likely to experience increased risk of hazards. This should also be considered in the investigation of growth areas. For example, identifying areas likely to be impacted by sea level rise over this century. For example, the Riverlea Park Housing Estate (also known as The Palms) that is four metres above the current sea level and will need to manage sea level rise that is already impacting underground water forcing it to bubble up to the surface.
- 42.** Promotion, education and incentives for environmentally sustainable and responsive design to support peoples understanding of the benefits and cost savings that can be achieved through energy efficient dwelling design and steps that can be taken to make new and existing housing more resilient to a changing climate.
- 43.** The LGA notes that insurance costs are increasing or not available for high-risk locations for example, flood insurance is not available for some locations along the Murray River. The GARP should provide greater recognition of natural hazards and how these will be managed and mitigated. Including, identifying areas that will be subject to greater hazard in the future, whether these areas should be avoided and support for relevant authorities (decision makers for new development) to manage new development in high-risk areas.
- 44.** Inclusion of a net zero emission commitment, greening targets, sustainable living and strategies to reduce car dependency supported through infrastructure planning that encourages other modes of transport.
- 45.** Water sensitive urban design principles, along with water collection and reuse should be encouraged and incentivised for new development and where retrofitting is proposed for existing development.
- 46.** Recognition and protection of South Australia's coastline and waterways, including associated habitats such as mangrove forests and sand dunes that provide protection to the coast. The LGA supports the Coast Protection Boards submission to the Discussion Paper.



47. Design quality that responds to climate change for example, verandahs over footpaths in the Adelaide city and reducing building footprint to land ratios to provide greater areas for greening (refer recommendation 3).

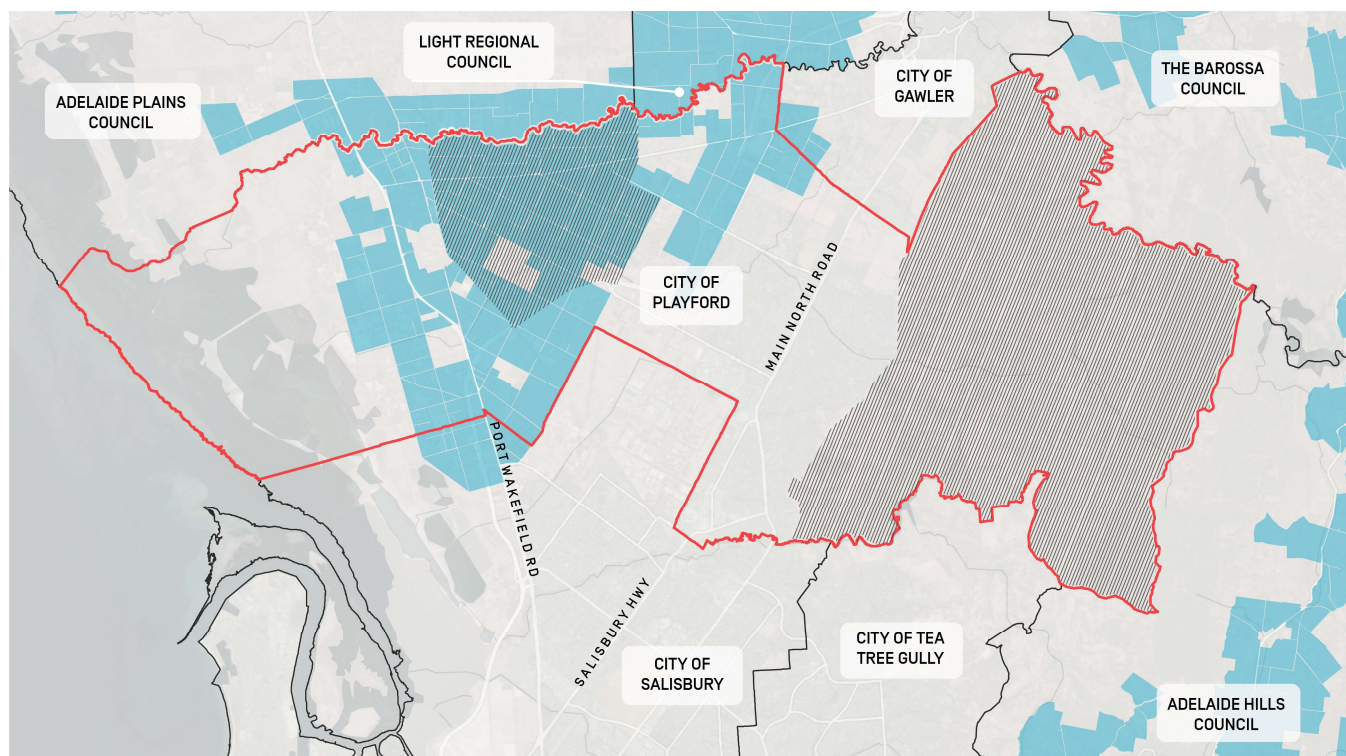
## 9 – Protection of Primary Production Land

The Discussion Paper identifies that not all of the Greater Adelaide region should be used for new housing and employment and that there is value and a need to protect land for other uses, including food production.

### LGA Comment

The LGA received a lot of feedback from its members about food production areas and food protection/security. The Environment and Food Production Area (EFPA) is intended to protect land from urban development. Interestingly the EFPA does not capture all of the land that has been identified by the Department of Primary Industry and Regions as primary production priority areas (refer **Figure 9**). This is also the case for areas in The Barossa Council, Adelaide Hills Council, Light Regional Council and the City of Onkaparinga.

**Figure 9** Environment and Food Production Area and Primary Production Priority Areas in the City of Playford



Plan Production: 13/10/2022

Primary  
Production Priority  
Area

#### LEGEND

— Playford City Council  
Boundary

■ Primary Production Priority Area

▨ Environmental and Food Production Areas (EFPAs)



The protection of primary producing lands and food security serve multiple purposes including:

- achieving the aspirations of living locally;
- ensuring that there will be food security and adequate food supply to support a growing population; and
- support the State's net zero emissions target by growing and using food within the State for example, reducing emissions due to reduced food miles.

## Recommendation

While the EFPA serves an important purpose in protecting land identified for the environment and food production, the LGA considers that the GARP also has a role to play in protecting food producing land outside of the EFPA. This could be done by:

48. Mapping land identified as primary production priority areas and protecting these lands from future rezoning and urban development.
49. Using available climate data to:
  - a) identify how the climate will change for current primary production lands into the future and whether it will be feasible to continue growing food in these locations;
  - b) identify the best and likely location/s for primary production lands in the future; and
  - c) consider the types of foods that will be produced on primary production land.

## 10 – Councils adjacent to the Greater Adelaide boundary

The GARP provides no consideration of the impacts of growth outside of the Greater Adelaide region boundary.

### LGA Comment

The LGA understands that Regional Plans for all the regions of South Australia are being developed to manage growth in these, however there may be pressures at the interface including people being pushed further out of the Greater Adelaide Region to access things like affordable housing.

## Recommendation

To fill this gap the GARP could:

50. Consider potential impacts on councils that are adjacent to the Greater Adelaide boundary, whether these councils are likely to experience changes because of the anticipated growth in Greater Adelaide and how these changes will be managed. This work would also feed into the development of the other Regional Plans in identifying future growth and infrastructure needs. This approach will create a key link between all of the Regional Plans.



## 11 – Appearance, Form and Implementation of the GARP

The appearance, form and implementation of the GARP is not yet known and will be an important aspect to its accessibility and success.

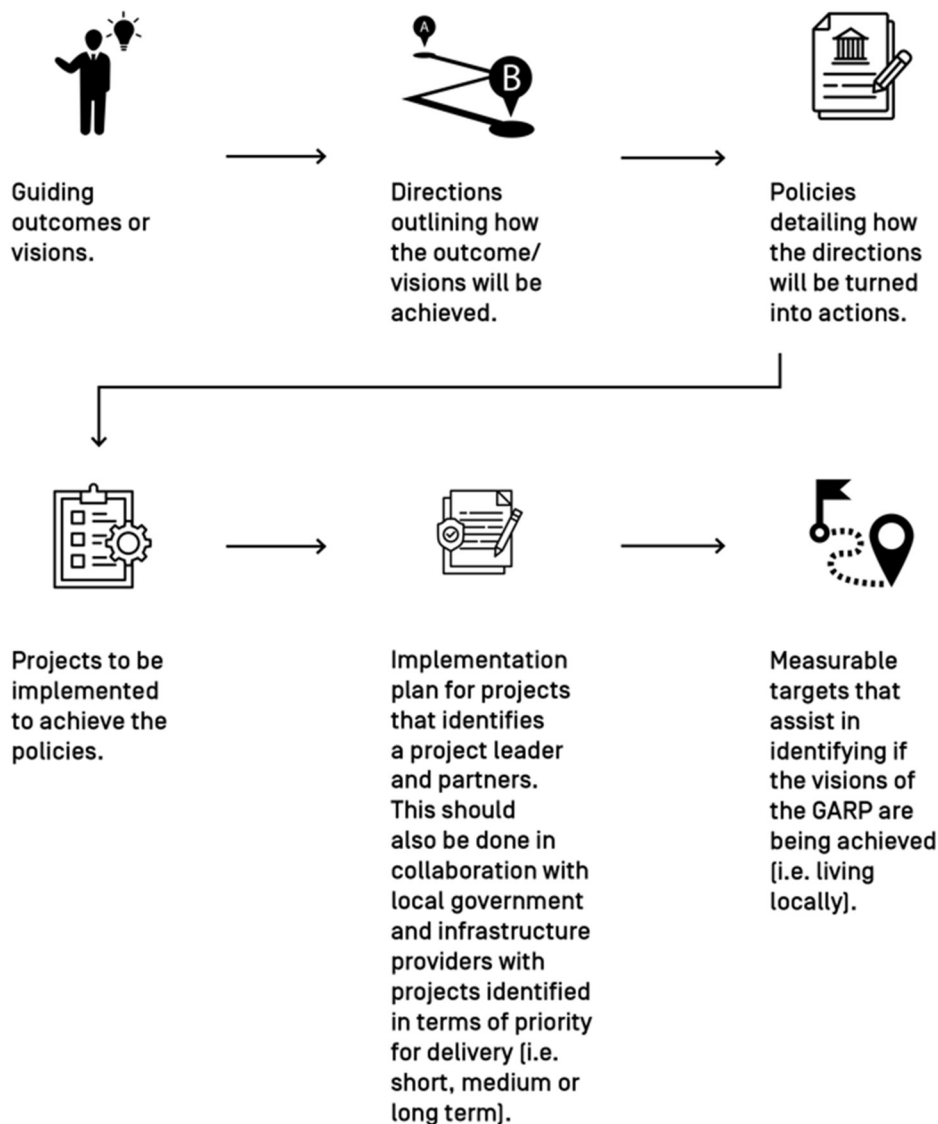
### LGA Comment

The LGA supports a GARP that is written in plain English, is easily accessible and includes details of how and who will implement key projects.

### Recommendation

The LGA provides the following example for consideration in drafting the GARP:

51. Plan Melbourne 2017-2050, that includes:



## 12 – Recognition of Traditional Custodians

The Discussion Paper acknowledges Aboriginal custodianship of Greater Adelaide and identifies four traditional ownership groups that have a deep and spiritual connection to land.

### LGA Comment

The LGA supports recognition of Aboriginal custodians in the GARP and the future growth of Adelaide and acknowledges the importance of working with Aboriginal custodians in planning for the future.

### Recommendation

To recognise and include Aboriginal custodians the GARP should include:

52. Meaningful and actionable policies developed with guidance from South Australia's First Nations Voice to Parliament that seek to include and engage with Aboriginal custodians in planning for the future growth of Greater Adelaide.
53. The GARP should detail how Aboriginal custodians will be engaged with, at what stage of the process and what input they will have.

## 13 – Delivery of the GARP

The Discussion Paper identifies that there will be considerable work in policy development, infrastructure delivery and built form outcomes (e.g., 300,000 new dwellings) that will need to be undertaken to achieve the strategic outcomes in the GARP.

### LGA Comment

The LGA is aware that South Australia is currently experiencing skills shortages in a number of development affiliated areas, including urban planners, builders, engineers, arborists and a variety of trades. The LGA understands that the industry will not be able to deliver the development needed to support anticipated growth in the GARP unless skills shortages are addressed. In addition to having appropriately skilled people to deliver the GARP there will also need to be secure access to materials.

### Recommendation

As part of its implementation the GARP should include:

54. A policy position on how skills shortages in the industry are going to be addressed. This could be through a variety of ways including:
  - a) Making available relevant tertiary education and incentivising study/training in the skills areas needed; and
  - b) encouraging skilled workers from interstate and overseas.

- 55.** Securing access to building materials by encouraging and incentivising use of recycled materials in new builds (i.e. circular economy) and supporting the manufacturing of building materials within the State.

## Summary

The LGA recognises the importance of the GARP in guiding the future growth of Adelaide and supports the Commission and DTI in undertaking this significant project for the State.

If a comprehensive, holistic and integrated approach is taken in drafting the GARP, with an emphasis on coordinated and robust infrastructure planning and delivery systems, design quality, greening and climate resilience, it will deliver a future for Greater Adelaide that maintains and enhances what is great about Greater Adelaide.

148 Frome St  
Adelaide SA 5000

GPO Box 2693  
Adelaide SA 5001

T (08) 8224 2000

E [lgasa@lga.sa.gov.au](mailto:lgasa@lga.sa.gov.au)

**[www.lga.sa.gov.au](http://www.lga.sa.gov.au)**