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Planning and Land Use Services
Attention: Growth Management Team
Department for Housing and Urban Development
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Property Council – Greater Adelaide Regional Plan Draft

Dear Minister Champion,

The Property Council is pleased to make a submission following the release of the draft Greater Adelaide Regional Plan (GARP) for consultation.

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

Consequently, our members have a direct interest in the vision and implementation of policies that determine land use planning in Greater Adelaide and South Australia.

Our members lead the property sector with the largest direct economic footprint in the nation – producing \$232.7 billion towards GDP, employing 1.42 million Australians and generating \$178 billion in employee income. Property and shaping the future of our cities is central to our national prosperity and touches the lives of every Australian.

The Property Council's 2,300 member companies are the nation's major investors, owners, managers and creators of properties and places that matter: homes, retirement villages, shopping centres, offices, industrial areas, education, research and health precincts, tourism and hospitality venues, and more. They shape our cities, create our communities and build the homes that Australians need.

In South Australia the property industry is estimated to have contributed \$12.3 billion directly to the state economy in 2021-22, equating to 10.2 per cent of total GSP and providing for 11.1 per cent of total jobs.

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

In responding to the GARP the Property Council has sought input from a broad cross-section of our membership with interests and expertise across asset classes and fields of knowledge such as planning, law and design.

We have endeavoured to structure our response following the thematic headings of the GARP:

- Vision
- People, living and liveability
- Productive economy
- Natural resources, environment and landscapes
- Transport and infrastructure
- Delivery and implementation

We thank the Minister and the Department for their consideration of this submission.

A handwritten signature in black ink, appearing to read 'Bruce Djite', with a large, stylized initial 'B'.

Bruce Djite

SA Executive Director, Property Council

Vision

There is strong recognition of the Housing Crisis in the GARP's vision, under the banner 'Our Biggest Priorities.'

From the outset the GARP outlines that an additional 670,000 people will require 315,000 new homes. This roughly equates to 10,500 homes a year over 30 years. ABS dwelling completions data for Adelaide suggests that on a seasonally adjusted basis the long-term average for completed dwellings is just over 10,000 a year.

The Property Council's members question whether an additional 315,000 new homes over 30 years is ambitious enough (albeit we acknowledge that, "the high growth scenario is used by state and local government when evaluating residential and employment supply", p21). This question is raised given that South Australia needs to be consistently delivering 16,000 homes a year to meet the National Housing Target. Considering the pipeline of major projects and the skilled workforce required to deliver such projects, including – but not limited to – Torrens to Darlington, the new Women's and Children's Hospital, Northern Water and of course AUKUS, the Property Council asks whether the 30-year figures account for the state's immediate housing requirements. The state must not fail to cater for the demand generated by the local and inbound populations. Adequately housing labour is the only way the state capitalises on the aforementioned critical economic opportunities.

Though strongly recognising the Housing Crisis in the document, members have commented that the GARP needs to convey a greater sense of urgency commensurate with the magnitude of the issue. If South Australia is going to increase the delivery of housing in accordance with the federal government's National Housing Accord targets – i.e. a 60% increase – and a focus on greenfield opportunities, then there must be a commensurate increase in land availability i.e. approx. 2,400 more allotments per annum.

The GARP commences by mentioning Adelaide's international recognition as a liveable city and the need to preserve and capitalise on our quality of life as a competitive advantage factor. To achieve an aspiration of 'Living Locally' – a theme that persists in the document as a means to achieve 'quality of life' outcomes – it is recognised that amenity and infrastructure challenges will differ in each community. How this is funded and coordinated is critical.

With greenfield development earmarked for the northern parts of Adelaide, the importance of long-term planning to meet the amenity, service and infrastructure requirements of these communities is going to be a great measure of their success. Given the relative socio-economic disadvantage in the northern areas of Greater Adelaide at present, the Property Council has advocated consistently for employment lands planning to be synchronised with residential development in these areas, and we reiterate that position again here.

To attract and retain a diverse population, the GARP also recognises the need to supply diverse housing forms. In its demographic analysis, the document acknowledges that an ageing population will require more specialised housing to cater for 'ageing in place' given the strongest growth will occur in age cohorts over 65 years of age. The same applies for other 'missing-middle' forms of housing such as Purpose-Built-Student Accommodation and Build-To-Rent.

The Property Council acknowledges the government has commenced work in this regard already, via the commencement of the Accommodation Diversity Code Amendment, and this is an important and timely component of future proofing housing supply.

Forecasting and planning for anticipated population growth, while necessary, is perhaps not as important as having a planning system that is flexible, responds rapidly to growth and embraces innovation in housing typologies. This requires a deep examination of the material, financial, policy and technology constraints that currently govern the rate at which housing supply is delivered. The GARP mentions that South Australia is the only state to have a fully digitised planning system and Regional Planning Portal. Capitalising on this and deepening investment in a data driven approach to planning and land use will provide a competitive advantage to South Australia, given the central role planning plays in facilitating economic growth. The Property Council applauds, for example, the recent and ongoing innovation in introducing the dashboard, journeying towards more transparency in land supply across residential and commercial land uses.

The GARP represents an opportunity for Cabinet to state clearly what it wants to achieve and how they will address these proprieties. Members commented that whilst the Greater Adelaide Regional Plan Outcomes stated on Page 17 are expressed as high-level guiding aspirations there is an opportunity for the government to express in more plainly how they intend to realise their agenda so that industry has clarity and can develop property behind that momentum.

Page 18 of the GARP under 'Greater Adelaide Regional Plan Outcomes' is dedicated to the importance of urban form in delivering the vision of the document, with an emphasis on the theme of 'Living Locally' transcending planning decisions and being realised in design and implementation. Members of the Property Council have stressed that there needs to be a focus on precincts and place for larger scale developments (both greenfield and infill) to ensure delivery of amenity, services, and connection when people move in (with no lag in delivery).

People, living and liveability

Much has been said publicly by the Property Council in respect of water and sewerage infrastructure and we were pleased to be involved and integral to the government's Housing Roadmap, which begins to address the challenge of infrastructure delivery. The lesson from this is that adequate infrastructure, capacity analysis, planning, funding and most importantly timely delivery across Greater Adelaide is an urgent priority if we are to manage growth successfully.

The GARP (page 25) calls out the importance of a 15-year supply (approximately 200,000 homes) of appropriately zoned land and recognises that housing typologies are currently concentrated in detached forms or apartments in urban corridors. It is critical that zoning accommodates a range of housing typologies so that communities bring together a mix of dwelling arrangements.

Adequate provision of zoned land supply is critical, but perhaps more important is the capacity of the state to manage periods of rapid growth and deliver the necessary services to meet requirements. This will be an ongoing aspect of work for the Housing Roadmap Oversight Committee as administered by the Department for Housing and Urban Development, and policy development in this space is welcome.

Members have suggested that the minimum update frequency on housing supply and land trends data should be quarterly. Waiting 12 months to review figures inevitably leads to missed opportunities to respond more rapidly.

It is important to note that the current affordability crisis has occurred within the current land supply framework for Adelaide. Hence, a fundamental shift in approach is required, and yet members feel that a recognition of this is lacking in the draft GARP. Whilst it is fair to say the rezoning of Mt Barker has not been perfect, the truth is the development of Mt Barker has materially increased housing supply.

The housing market in Adelaide requires different locations, product types, price points, and hence the prioritisation of zoned land at Goolwa, Victor Harbour and Murray Bridge will only cater for a small portion of the overall market.

The Land Supply Dashboard currently identifies approximately 5000 development-ready allotments which is a bit over one year's supply, and Target 1 identifies the need to maintain a 5-year rolling supply of development ready residential land i.e. approx. 20,000 allotments – yet the Plan doesn't provide clear guidance as to how this will be achieved. To improve confidence and certainty in the sector, it is vital to articulate how and by when this target will be achieved, otherwise it will be nothing more than an arbitrary metric with little to no accountability.

Members also suggested that the GARP is overly reliant on large-scale estates which is likely unrealistic when the success of our housing market has been delivered by a variety of large and small estates in the past. For example:

- Mt Barker – An urban growth area since 2010 has only delivered about 4000 lots
- Concordia – Work started on this project in 2012
- Dry Creek – Work started on this project in 2016
- Hackham – Work started on this project in the early 2000's
- Buckland Park – Work started on this project in 2010 and it has only delivered 1000 lots to date

History shows that a focus on single large estates concentrates risk and the flow of housing supply from such estates takes several years, if not decades to come online. The Plan doesn't address the significant decline in actively trading estates. COVID-19 significantly reduced the number of estates, as many sold out or were completed, and there hasn't been a replenishment of stock since. There is an over reliance on the land supply metrics in the Plan, however if recent history is a teacher, these need to be treated with caution.

There is a strong focus on the government having a central role in growth through each step of the development process that only creates frustration, delays and leads to increased costs in the development industry. Members are strongly supportive of strategic infill initiatives that facilitate and promote this type of land use. However, these opportunities shouldn't be led by the government. Government led development projects are cumbersome and often create roadblocks to unlocking opportunities. This is an issue the Property Council has publicly advocated for strongly in the past.

A key measure of liveability is whether the residents within Greater Adelaide have ready, equitable and affordable access to services and economic opportunity. This means that longer-term growth

areas need to be distributed across Greater Adelaide with upfront design work accounting for the provision of social infrastructure, connectivity and amenity. However, although the aspiration in the GARP appears to be for the 'liveability' aspiration to be a distributed ideal across Greater Adelaide, the focus of the GARP is certainly concentrated in the Northern parts of Greater Adelaide. For example, Concordia is an important part of Adelaide's future growth however members have identified that land at Kudla could be developed as well, and it is on an electrified train line but has fragmented ownership. The underlying point from our members is that better sequencing decisions are required, because currently this is not apparent.

The Property Council acknowledges that the state government has determined to no longer pursue a target ratio of greenfield to infill development. However, whilst establishing the requisite infrastructure needed for the earmarked greenfield development areas, the Property Council implores the government to have a greater emphasis on accelerating infill development, especially in the interim. Members have also stated that although the GARP is a 30-year plan, there aren't any concrete immediate actions that are identified to provide development-ready land in the short term – circa the next 5 years. On Page 35, the GARP acknowledges that "Infill development is a critical source of housing supply". The same page refers to focus areas moving forward such as "improving design quality in current general infill areas" and "identifying more strategic infill areas...". Members have commented that the hard work of ensuring these focus areas materialise must happen quickly to bring forward housing supply. In the same category, work that will enable the state to bear fruit in respect of Greenfield such as the "future investigations required" listed from Page 62, should be prioritised as work that should come forward.

The Property Council fully supports the identification of strategic infill sites, especially those owned by state government. We presume the reference to site identification also includes local government sites. The GARP notes that capacity to accommodate an estimated 96,000 dwellings already exists, and that to 2051, a further 110,000 are identified to provide housing and locational choice. High quality and amenity housing options that break the mould such as the Glenside development in respect of height are important examples where strategic infill can accelerate housing supply with readily accessible lifestyle benefits, great amenity and in close proximity to jobs. Leadership will be required to ignore the noisy minority and champion the wishes of the silent majority in Adelaide, which embraces change in respect of height and density in infill locations. Unlocking and maximising the yield on infill sites also enables LGA's to provide more rental options in a market where ownership is becoming increasingly difficult.

Urban corridors are sensible choices to provide density to leverage existing infrastructure. This needs to be supported by a strategic view on amenity and connectivity. Adelaide is still a car orientated city. A strategic approach to infrastructure is needed to develop more comprehensive public transport, pedestrian and cycle friendly networks to make greater patronage of active transport options a convenient and economically rational choice of transport.

On page 61, members noted that the Outer South has 8,234 lots. In comparison to the North this is relatively low, and again we reiterate the point that the ability to live up to the mantra of 'living locally' will require an important emphasis on the delivery of amenity, social infrastructure and employment lands. This is especially the case if future population growth is concentrated in the North.

On page 81, the Property Council acknowledges that the GARP notes the need for clear assessment pathways for diverse housing products such as Build-To-Rent, Purpose-Built-Student Accommodation and Retirement Living. Locational optionality is important for delivery of these

products to provide a diversity of housing choice across Greater Adelaide. These asset classes provide institutional and private capital solutions to deliver housing at volume and will ease conventional housing supply constraints.

It is also positive to see that the GARP acknowledges the current lack of medium-density housing in master planned communities and notes that they are an important feature of affordable housing supply. It notes on page 82 that new performance measures around density will be established in the Code. The Property Council nationally produced a paper *called 'A Stark Reality: The State of Housing Choice in Australia'*, which emphasised the need for Australia to pivot to supply of more high-amenity, medium-density housing connected to public transport and jobs. We therefore fully support a greater degree of well-planned medium-density housing.

It is pleasing to see that the GARP acknowledges Retirement Living as a specific housing asset class as it enables senior South Australians to 'age in place'. Given South Australia has the fastest ageing population in mainland Australia, this asset class needs to be an area of urgent focus. Investment in Retirement Living has receded in recent years in South Australia. This is partially attributable to a lack of certainty as investors await the outcomes of legislative reform currently before the South Australian Parliament regarding the Act governing the operation of retirement villages. However, this is likely to be finalised by the end of 2024. Therefore, it is important that discussions continue around the flexibility of planning policy but also, how planning policy can further incentivise the development of retirement living options. We support and note that PLUS has recently included considerations of further height for retirement villages in South Australia as part of its Accommodation Diversity Code Amendment.

Members have expressed that they would like to see the GARP expand on the details mentioned under the Affordable Housing Reforms on page 84. The offset scheme would be something particularly applicable to our members. Some members have commented that they don't support the Affordable Housing Offset scheme as this will force up the pricing in the housing market and is viewed as a tax on development. It is imperative that the government engage deeply with the Property Council on any proposed Affordable Housing Offset scheme.

With respect to the GARP's section on Adaptive Reuse, the Property Council offers its support in further investigation of how land uses for heritage places can be broadened.

Productive economy

In mid-2024 the Property Council produced research titled *"Land Locked: The economic potential of unlocking Adelaide's industrial land supply,"* to investigate the availability of development-ready employment land in the Greater Adelaide region.

The report found that of the 1,500 hectares of Adelaide's 'vacant' employment lands identified by Plan SA in 2021, over 90 per cent is no longer available or is not considered development-ready. It also identified that without action, currently zoned industrial land could be gone in just over two years and that Adelaide has the same per-capita industrial space profile as Melbourne.

The report made several recommendations including:

- Renewal SA to release 25 hectares of fully serviced employment land annually

- The establishment of a \$250m fund to support industrial projects by delivering enabling infrastructure and supporting land preparation and remediation
- Implementation of a fee structure for developers to fast-track development applications and Code Amendments
- Improving servicing efficiency by broadening the remit of HIPDU to assist coordination of services in industrial precincts
- Alternative strategies for provision of temporary sewer where a site can operate until a permanent solution is found
- Ensure the protection of key industrial precincts in the Greater Adelaide Regional Plan - including last mile space land preservation
- Development of an industrial land supply tracker.

Members of the Property Council would stress that South Australia must avoid a future situation where development-ready employment land becomes unviable or worse still, unavailable. It will be critical for Government controlled employment lands to be adequately serviced and development-ready prior to release to market. The Property Council acknowledges the progress on the development of an industrial Land Supply Dashboard.

An understanding of what current and future users of employment lands require from a power, gas consumption perspective will assist with planning and infrastructure for new and existing employment land supply.

The Property Council sees growing demand for larger power and gas requirements for industrial, manufacturing and technology occupants such as data centres as businesses transfer to renewables and automation. The rapid advancements of technology, AI (artificial intelligence), and the associated power requirements of future industries should be deeply considered. Feeding this data into network planning will be important and can provide the state with a competitive advantage to meet the demand when it arrives.

In relation to state significant industrial land precincts, awareness of the impact that highly curated precincts such as Tonsley and Tech Park can have on employment lands availability in Greater Adelaide needs to be given consideration. When space is in high demand and yet supply is low, or businesses do not qualify for these curated spaces, this impacts availability and the cost of tenancy in a market that needs to have a competitive advantage in being easy to locate good space for future businesses. Flexible industrial precincts that allow for a diversity of tenants, owner occupiers and developers to participate in and provide a range of employment outcomes should be considered when curating an industrial precinct.

Employment land infrastructure, planning and delivery should also consider how proximity and access to rail can be enhanced and accommodated. It is very difficult to access land with the ability for rail sidings for freight and logistics uses.

Tonsley and Lot 14 have been great examples of state innovation places. Looking at future opportunities on strategic sites across the city such as Keswick and Port Stanvac would be supported.

The Property Council appreciates the engagement from the state government on this topic throughout 2024, which is important to our members and of course the state's economy. We reiterate these recommendations here and will be looking to deepen our engagement and assist PLUS in identifying where to prioritise effort and spend.

Natural resources, environment and landscapes

In terms of general commentary on the section of the GARP dedicated to questions of environmental and biodiversity concerns, members offered that the primary object of the PDI Act is to support and enhance the State's liveability and prosperity. This should be implemented in ways that are ecologically sustainable and meet the needs, expectations and reflect the diversity of the state's communities by creating an effective, efficient and enabling planning system.

The Act seeks a planning system that promotes and facilitates development, and the integrated delivery and management of infrastructure and public spaces and facilities. The Act intends that the planning system is based on policies, processes and practices that are designed to be simple and easily understood.¹

Despite its broad ambit, the planning system cannot be asked to be the answer for all social, cultural, environmental, and economic objectives of the State. While commendable, certain goals like increasing biodiversity in front and back yards are better achieved by education and incentives rather than by regulation. It is important that planning policies strike a balance between freedom of innovation and control, and between carrot and stick.

In respect of the issue of biodiversity, members offered that biodiversity goals are proposed to be achieved by retaining existing areas of biodiversity importance and promoting the establishment or increase of biodiversity elsewhere.

The goal of retaining existing biodiversity areas is in part achieved through other legislation including the *EPBC Act*, *Native Vegetation Act* and *Landscapes Act*. The biodiversity of wetlands, riverine systems and in-tact areas of native vegetation is acknowledged and supported. Key environmental areas that are not already protected can be identified as part of Code Amendments.

However, we question certain assumptions in the draft GARP, including the biodiversity values of vacant land.

It should not be assumed that monoculture farming with scattered trees represents high biodiversity or that greater biodiversity could not be achieved in the creation of open space (reserves) in association with the development of land.

In setting policies there should be some evaluation of the biodiversity potential before and after developments.

Ultimately, long-term biodiversity outcomes are difficult to secure on private land. Council reserves have the greatest biodiversity potential and are the most logical focus for long term biodiversity outcomes in association with the development of land.

The planning system should recognise the biodiversity value of innovative stormwater management in reserves such as vegetated swales, creeks and wetlands and allow those areas to count towards open space, a position rejected by many councils.

¹ *Planning, Development and Infrastructure Act 2016*, s12.

Local governments must be prepared to do some of the heavy lifting in this space. It will be necessary to counter the reluctance of some councils to maintain reserves with increased planting and water sensitive urban design features, in lieu of the tradition of lawns and concrete pipes.

Tree canopy is an area of key concern for our members. Planning policies should look at ways to incentivise tree canopy cover beyond simply penalising removals or burdening projects.

The assumptions about tree canopy cover before and after developments should be evaluated. Utilisation of the public realm will be critical to achieving tree canopy targets. The Commission should consider incorporating tree planting guidance into infrastructure standards for roads and reserves. We also encourage the Commission to address the overlapping application of native vegetation and regulated tree controls.

Site contamination has also been a subject close to the hearts of our members. Policies addressing site contamination and other hazards should be commensurate to risk. Other than where land is known to be unviable to remediate, site contamination should not drive spatial planning outcomes.

The Property Council has previously advocated that on matters of site contamination, the planning system is not the only or indeed the primary gatekeeper of this issue. *The Environment Protection Act 1993* adequately regulates site contamination and has done so for several years.

The burden of managing site contamination should not be substantially shifted to the planning system simply because it is convenient to the EPA for that to occur.

On 24 September the Property Council wrote to Planning and Land Use Services in respect to the Site Contamination Development Assessment Scheme Code Amendment. We would once again refer those charged with the creation of the GARP to consider our comments regarding amendments to the Land Use Sensitivity Hierarchy and dealing with site contamination assessments as reserve matters.

Members have noted that on page 18, the GARP notes early on that “areas for new housing development and renewal considers the protection of character and heritage.” Preferred language that better reflects both the past and the future is the “protection and enhancement” of areas of heritage and character value so as not to entrench a ‘no-development’ mindset.

With respect to “State and Local Heritage” on page 97, there are seven “Long-Term Strategic Objectives” in the draft GARP. Members have suggested that these could be condensed to four simpler objectives as follows:

1. A legislative framework for heritage that provides consistency, clear governance responsibilities, supports expert advice in the decision-making process, enables transparency and accountability, and facilitates community engagement at the right time.
2. A comprehensive register of heritage places to enable applicants and communities, areas to understand the values of heritage places/areas.
3. Several tools in the planning system that provide heritage and character protection, while also being flexible enough to unlock creative design solutions including adaptive reuse.
4. Councils lead the identification and listing of Local Heritage Places to protect the local historical attributes and themes that are important to local communities.

Page 99 of the draft GARP indicates that:

“...a 2020 feasibility study that found that Adelaide and its Rural Settlement Landscapes were of high heritage value and worthy of addition to UNESCO’s World Heritage List”.

“...to prepare the World Heritage nomination documents, a consortium of councils and agencies are working with World Heritage experts”.

“...the proposed World Heritage boundary will likely be limited to a series of smaller areas that already have a form of heritage or character protection”.

The Property Council is concerned that World Heritage Listing may add an additional layer of bureaucracy to the development assessment process where there may already be adequate heritage protection. It is also unclear what the advantages of World Heritage Listing are for this to be such a prominent element of the GARP. In this context, it is requested that reference to a possible World Heritage Listing bid be removed or at least abbreviated.

With respect to page 100 and the discussion on “Landscape and Neighbourhood Character”, there are seven “Long-Term Strategic Objectives” in the draft GARP. Again, members have suggested that these can be better condensed to four simpler objectives as follows:

1. Retain the special qualities of the Barossa and McLaren Vale Character Preservation Districts while recognising their important economic function and allowing for the correction of anomalies.
2. Protect Adelaide’s Hills Face Zone as the undeveloped backdrop to the Adelaide Plains while allowing for the correction of anomalies, noting this is considered in the table of actions at the conclusion of the document.
3. Protect and enhance identified areas of character value with carefully designed development, remaining flexible enough to unlock creative design solutions for infill housing that increases density in these often strategically desirable locations.
4. Councils lead the identification and designation of new character areas that have consistent and desirable physical attributes that are important to local communities.

With respect to Neighbourhood Character on page 102, this section of the draft GARP states that:

“Representative buildings are referenced in (Character Area) Statements. They are buildings which display characteristics of importance to a particular area. The role of these buildings is currently under review to ensure their purpose is clear for assessment of development proposals...

...Tougher demolition controls are therefore proposed in character areas that only allow for demolition of a building once a replacement building has been approved”.

The Character Area Overlay should only be applied in areas where there is a consistent and identifiable character across several buildings located in proximity.

The focus in the Character Area Overlay is on maintenance of a desired character, whether that be through the retention of existing buildings or entirely new buildings.

The Property Council does not support the inclusion of representative buildings within the Character Area Overlay. It elevates the status of such buildings in a way that implies they should be retained or are like Local and State Heritage Places.

The Property Council also does not support tougher demolition controls in the Character Area Overlay. Clear and prescriptive planning controls provide adequate assurance that new buildings

will be complementary to the desired character of an area. It should not be a competition between which building is preferred – old or new.

With respect to the section dedicated to Housing Diversity and Character from page 103, this section of the draft GARP states:

“An alternative to infill housing, a new form of shared housing or co-located housing is proposed which requires an existing house to be retained, repurposed and added to, providing high-quality designed dwellings surrounding communal open space... The proposed co-located housing model seeks to deliver critical housing options for smaller household types, responding to the ageing demographics of the state’s population.”

The Property Council supports this policy intent. At the same time, members of the Property Council have recently experienced resistance from several Councils to ancillary accommodation that varies marginally from the quantitative provisions of the Planning & Design Code. This is even in areas without character value. Having Councils embrace this policy position will require leadership as well as careful monitoring and management.

Transport and infrastructure

Great cities have great transport and infrastructure. For Adelaide to continue to be a ‘liveable city’ it must get transport and infrastructure delivery right.

Currently Adelaide is still a relatively driveable city with relatively low patronage of public transport. The economically rational choice for many commuters may still be to drive, however population growth will push more people to adapt and adopt other means of transportation. Planning for this growth is essential.

As stated on page 10, the 2010 iteration of the 30-Year Plan “recognised the need to transition to an urban environment centred on walkable neighbourhoods and access to public transport”. Members posed whether the very minor change in the extent of car ownership over time, even with the introduction of walkable neighbourhoods means a more proactive approach may be required to address over-reliance on private vehicles. The GARP openly recognises the increase in private car travel over time, but only seeks to support, promote, encourage (and other similar words) greater use of active transport. Stronger language is required to motivate the creation of public transport options that appeal to a broader cohort of the population.

Further, the GARP aims to deliver on ‘living, working and playing locally’ and the state government has had this mindset through previous versions of plans for state growth, but whether this is being achieved to the extent desired is debatable. The Plan needs to strengthen the message and mechanisms through which it can ensure integration between a sustainable quality of life, an effective transport system, a sense of place, and active transport.

For example, given the population and demographic projections forecast on page 21 of the Plan, there will be a need to ensure our ageing demographic has increased quality of access and availability of quality public transport to support increasingly popular aged living options.

An integrated and connected region will need to consider the transport demands of connected neighbourhoods; a step-change from traditional spoke-style transport routes. ‘Webbed’ linkages

between neighbourhoods will be required to move towards a more integrated transport and land use system, including between growth areas. Members have expressed that the Plan should recognise the need for these linkages more clearly.

Strategic transport corridors require consideration of user needs well beyond the life of the GARP. Members ask whether the Plan needs to articulate more clearly the 'how' and 'why' people travel in 50 or more years. The Metropolitan Area Plan from the 1960's has stood the test of time, but members posed whether there is sufficient long-term foresight within the document. The South Australian State Transport Strategy, slated for finalisation in 2025, sits behind the GARP. We know that there is more detail required to complete the chapters that sit within this. Members asked how do both the structure and requirements within the GARP ensure that this transport planning work does not fall too far behind? Members felt that the draft must articulate this more clearly.

Page 168 speaks to freight and supply chain networks as well as state road infrastructure. A circular economy that provides sustainable outcomes must promote reduced travel kilometres, carbon footprint and 'support local' for freight and supply chains. This philosophy however is not well articulated. Current and future land use for manufacturing, food production and significant industry development must include this as a key goal. This section openly accepts that increased private car trips will occur across Adelaide into the future. We support the intent to provide greater transport choices rather than supporting road widening only given that movement corridors can serve more than private cars alone. Where appropriate, denser residential living along and in the vicinity of these corridors may assist in encouraging greater transport choices.

Transport Oriented Development is something the Government is already looking at and this is applauded. Page 172 speaks to the growth of public transport in growth areas. Newer growth areas located further from the CBD are at greatest risk of promoting higher private vehicle use. There needs to be acknowledgement of the need to prioritise efficient and well-connected transport links to these areas, and in a manner that best supports all generations of users.

Page 173 refers to potential future infrastructure as the least certain in terms of infrastructure delivery.

"It is future or potential infrastructure identified as required in an approved state policy or strategy and eventually will be identified in the Plan and planning should ensure that the ability to deliver this opportunity is maintained."

There is opportunity for a more proactive, or at least an iterative approach to the determination of potential infrastructure required to support the Plan.

It is commendable that social infrastructure is acknowledged in the GARP. Quality social infrastructure underpins communities. Its impact is often in assisting, retaining and supporting populations through economic rises and falls. In addition, it creates its own economic streams and facilitates community wealth. Its value cannot be underestimated and must be valued properly from an economic perspective. How this is funded, planned and delivered is of concern to all levels of government. Members of the Property Council are integral to this asset class. Comments in relation to several social infrastructure categories were as follows:

1. TAFE SA and Public Universities - Remote access to learning facilities and centres of educational excellence is imperative to retain young members within communities. These facilities however must be seamlessly tied to employment opportunities that are current, innovative, exciting and relevant to minimise the leakage (or loss) of skills both interstate and overseas. Adelaide, and more broadly South Australia, is known for its attractiveness to raise families. It is suggested that the Plan reflect the need to provide educational

facilities that cater for relevant age and demographic ranges represented within various communities.

2. Health Services - Effective health services must be built upon optimum connectivity to both transport and communications. It is suggested that the Plan recognise priority for resilient road links, efficient travel routes and services, quality digital health services and communications infrastructure as related to health services.
3. Social Housing - It is suggested that the Plan openly recognise the need for social housing to be supported by quality active transport systems, public transport and community transport services.

Additional comments from members for this section of the draft Plan included:

1. Page 193 on 'Planning for and managing risks from natural hazards' - That the Plan prioritise the need for a resilient infrastructure network, including consideration of the impacts and mitigation of the loss of key infrastructure and where levels of redundancy may be required.
2. Page 198 on 'Infrastructure corridors and reserves' - Whether the Plan looks far enough ahead? Is sufficient consideration being given to preserving land, infrastructure and other elements for our future generations?

Implementation and Delivery

Outcome 6 is an important component of the GARP and signals the utility of collaboration between various levels of government as well as between agencies, industry and the community. The Property Council also made a submission to the State Infrastructure Strategy that aligns with its original GARP submission. Alignment and coordination between the objectives and implementation plans of Infrastructure SA, PLUS and DIT is critical.

The Property Council supports targets 1-3 on pages 202-204.

It is also positive to see employment land supply feature. Again, the Property Council has advocated for the preservation of "last mile space". The target here mentions that there will be no net loss of employment potential unless land has been identified for future strategic infill development. Of course, land close to the CBD is prized and makes sense for housing, however it also makes sense to have land in proximity to the CBD for storage, employment and logistics to service dense populations. Once developed as housing these sites would be virtually impossible to return to other uses and we urge foresight in this regard.

Target 4 is troubling for our members.

As a general aspiration it is admirable, but if it just leads to intransigence on the removal of regulated trees to enable infill or greenfield development it is problematic. The law and policy on regulated trees are not playing out effectively. It is leading to a very rigid "keep all trees" approach across most Councils. This is even before one looks at what the Native Vegetation Council are doing to land that is zoned for residential development but is within the Native Vegetation Overlay. This approach is putting a handbrake on developing homes.

To avoid more conflict between housing supply and affordability, tree laws urgently need revisiting, and this policy needs more specificity. What will this mean for developers of master planned estates and their obligations to plant trees in streets and reserves? Presently there is none and it is negotiated with the Council. Councils often use the threat of not accepting the vesting of these areas unless its desires are met. We suggest open space strategies for local government should be built into the Code to address existing and planned future open space.

The “coordination and delivery” discussion on Page 207 is mostly supported.

The only substantive concern is “Long-term strategic objectives” Item 7 where costs of out of sequence development is borne by developers. If this is appropriately defined it may work.

In particular if it is cash flow not cost, and so long as the cost can be recovered. For example, if all developers are paying a cost for infrastructure (e.g. the SA Water \$10,000 per lot) but only as SA Water rolls out its infrastructure. If a developer wanted to get water ahead of their planned roll out, there needs to be the flexibility for the developer to pay for the works up front, however, there must be a mechanism for the money to be reimbursed but for the \$10,000 per/block that would have to be paid in any event.

Sequence rules need to be adaptive and sufficiently flexible to permit one developer who might be more agile to get started rather than having to wait as development slowly comes down the line. Developers move on opportunities at different speeds and do not have the same capacity to deliver projects. Therefore, it is important that the government is not controlling the release of projects by limiting infrastructure delivery too rigidly but allows enough flexibility for the land development industry to do that with limited constraint. Essentially, there needs to be a mechanism that allows developers who are ready to develop to, “jump the queue”. If the rules around sequencing are too rigid, it will result in development being stymied.

If housing supply and affordability are indeed a priority then we cannot allow overly rigid sequencing rules, which lead to missed opportunities to deliver housing.

Page 208 references an Amendment to the Plan with work to be done in 2025. The Property Council supports this work and suggests that it is integral to the realisation of the Plan.

Page 209 outlines roles and responsibilities. The Property Council has no comments regarding this page and generally would support it.

Page 212 has a section dedicated to “Process for new growth areas”. The Property Council has no comments regarding this page and generally would support it.

Page 214 refers to Council strategies. The Property Council would recommend that the focus for Councils to enable realisation of the GARP should be on asset audits and gathering data on the age and condition of existing roads and stormwater systems and their capacity for sustaining growth. In addition, Councils can play a positive role by planning and preparing strategies for delivery and management of open space.

Page 215 refers to the long-term strategic objectives in respect of infrastructure charging. These are supported and the Property Council acknowledges the work that needs to be done to arrive at a framework that is fair, transparent and proportionate and leads to certainty.

Page 217-218, the Property Council supports.

