



**SUBMISSION**

**BY THE URBAN DEVELOPMENT INSTITUTE  
OF AUSTRALIA (SA)**

**IN RESPONSE**

**DRAFT 30-YEAR PLAN FOR GREATER ADELAIDE**

**30 September 2009**



**UDIA (SA)**

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## **INTRODUCTION AND OVERVIEW**

Thank you for the opportunity to respond to the draft 30-Year Plan for Greater Adelaide ("the Plan").

The Urban Development Institute of Australia (SA Division) ("UDIA"), in general, strongly supports the Plan and eagerly awaits its implementation.

The UDIA specifically supports the intention to identify priority zoned land and key infrastructure that will assist Greater Adelaide grow its population to at least the estimated 1.85 million by year 2036. We support the main aim of the Plan *...to outline how the South Australian Government proposes to balance population and economic growth with the need to preserve the environment and protect the heritage, history and character of Greater Adelaide.*

UDIA commends the South Australian Government on its initiative to include in the Plan spatial illustrations of the growth areas and the related infrastructure, particularly the identification of proposed extensions of mass transit infrastructure. The use of such specific maps is essential for industry certainty and has been a conspicuous weakness of most of the draft Plan's predecessors over past decades.

The integration of land supply, housing, jobs and economic activity is commendable, allowing the Plan to serve as a blueprint for a range of sub-plans, particularly from the various public sector agencies, providing a framework for a much-needed "whole of government" approach to urban growth management.

The development of more specific plans and indicators to guide the implementation of the Plan, and indicators to monitor achievement of both outputs (from delivery of the Plan) and outcomes (from attainment of the Plan) is critical to the overall success of the Plan.

We recognise that the provision of such details in a draft Plan will be responded to by various groups that seek to 'water down' the Plan with amendments and stalling tactics that will not serve the future generations of South Australians. UDIA will support the South Australian Government in guiding the implementation of this Plan, recognising that growth of housing, jobs and the economy in general will result in a desirable quality of life for all citizens of the State.

The UDIA supports the integration of infrastructure plans and land supply plans, taking note of the demography of the population. Such plans need to be timed to ensure sufficient lead-time is created for construction of the infrastructure to ensure affordable property development can occur. UDIA notes with concern the increasing loss in advantage of SA over other states with housing affordability, largely due to costs in acquiring, planning and developing land ready for building. The planning system has a key role to play in addressing these issues – particularly in reforming land supply and regulatory regimes.

UDIA strongly supports the Government's adopted policy of identifying 25 years' rolling supply of urban land, of which at least 15 years will be zoned supply. We are pleased to note that this policy is a cornerstone of this Plan. We are pleased that the Government acknowledges that abundant supply of land is necessary to achieve the stated

objectives. This is a policy position of fundamental importance that must be preserved into the final version of the Plan and its implementation.

In providing this feedback to the Minister for Urban Development and Planning, UDIA urges the Government to stay firm in its expressed desire to implement the Plan to achieve the stated objectives, and not fall victim to tactics by some stakeholder groups like those that have contributed to the slow rate of implementation of the Residential Development Code.

The UDIA remains strong in our support of the Government in implementing the overall Planning Reform program. UDIA is a strong supporter of the Plan. Our industry is keen to work with the 'drivers of implementation' of the Plan to ensure it achieves its intended outcomes.

We do not want this Plan rewritten. Despite many issues to be resolved we believe the draft Plan should be issued with the necessary amendments as soon as possible, recognising that a long term plan can be amended 'along the way' by a studious implementation group, which we ask should include representation from UDIA.

The main challenge from here should be implementation – the UDIA supports the draft Plan and looks to its speedy delivery, avoiding a protracted debate on the document itself in favour of getting on with making it happen.

The following sections of this submission provide details of various issues.

## KEY STRENGTHS OF THE PLAN

The UDIA supports the key features of the draft Plan and calls on Government to ensure that the following features are strengthened in the final version of the Plan:

**1. being based on a high (but not extreme) population/employment growth scenario**

A high growth scenario is essential to ensure that the planning system is geared to achieve the State's growth goals and maintain housing affordability. It is much easier to "step down" if necessary from a high growth scenario than it is to "step up" from a low growth scenario.

The draft Plan is based on a growth scenario that is appropriately high, but not extreme. Government should acknowledge that some scope does exist for actual growth to outstrip the draft Plan's growth scenario (although unlikely) and be prepared to adapt as necessary.

**2. setting specific long term infrastructure priorities (especially transport extensions to serve new growth areas)**

The draft Plan's delineation of forward infrastructure priorities (particularly in relation to transit extensions and improvements) provides an essential underpinning for industry confidence, community support and whole-of-government coordination.

**3. setting specific targets for balanced growth by geographic sub-region and by sub-market (fringe, infill, townships)**

The draft Plan's specific numerical targets for growth are essential to underpin industry efficiency and infrastructure planning and coordination, as well as to compel supportive planning actions by local Councils. This feature of the draft Plan gives everyone "something to aim for".

**4. setting land supply budgets to deliver on the policy of 25 years' supply (15 years' zoned)**

Historically, State Government planners have grossly overestimated land yields and hence grossly underestimated required land supply. The result has been a policy-induced shortage of land which has unnecessarily exacerbated the decline of housing affordability. The draft Plan's land supply budgets are essential to redress this public policy failing and to provide targets that can be monitored and reported on annually.

**5. making allowance in land supply targets for uncertainty (30% buffer) and non-urban land requirements (40%-60% buffer)**

The declining role of Government in fringe land banking will increase the impact that landowner decisions have on the amount of land brought to market. Put simply, there is no way of compelling any owner to develop and sell any land. Allowance must be made for this uncertainty. Similarly, the large and increasing

amount of land required for non-residential purposes must be allowed for in land supply budgeting.

**6. the State taking a leadership role in planning for priority growth areas**

The UDIA strongly agrees that substantial growth areas are simply too important to leave to local Councils. It is essential that the State Government takes a leadership role to ensure these areas are planned, zoned and developed in a timely and efficient manner.

**7. clearly indicating spatial extent of growth and setting directions sufficient to enable structure planning**

The final version of the Plan must be spatially precise in its directions for each sub-region. There should be no need for intermediate levels of plans (such as the "Regional Land Use Frameworks" promulgated by DPLG's predecessor agency). Growth areas must be able to proceed directly to structure planning.

We now move to discuss other strengths of the draft Plan.

**Land Use, P3, 96**

UDIA supports the draft Plan's infill goals and the intent to make best use of current urban lands, particularly around transport corridors. It is essential that development land be identified and integrated with the availability of road and rail infrastructure. It is not sufficient to state that this will happen; development land needs to be directly linked with already available road and rail infrastructure.

UDIA notes the current mix of infill to urban fringe land (allotments) in Metropolitan Adelaide is around 50:50. We expect this ratio will continue for many years, as it will take time to achieve the draft Plan's desired shift to 70:30. The outer metropolitan areas will still need to be adequately serviced, as well as the developing inner areas.

"Infill" needs to be clearly defined - is it within the existing urban footprint or within the existing Urban Growth Boundary (UGB) - if the former, major interventions are needed to achieve the target – if the latter, much more land will be needed outside the UGB than is provided in the Plan).

The "infill" target (70% of all new dwellings annually by the end of the next thirty years) needs to be driven by providing infill opportunities, not by constraining fringe supply (constraining fringe supply does not "force" density other than by sacrificing affordability).

The draft Plan suggests four factors that determine the amount of land to be set aside for residential purposes. UDIA suggests another factor – that there be sufficient land available to the market to ensure effective private sector competition, and to keep broadacre land costs as low as possible. Put simply, abundant supply is essential to promote competition and innovation.

**Mixed Use Precincts, P3**

The plan for mixed use precincts to allow closer proximity between jobs, housing and services is a good one. However UDIA notes that there will still be a high level of jobs and housing situated outside these precincts and that:

- not all jobs can or will necessarily be efficiently served by public transport
- jobs in the city must be encouraged – to ensure our capital city CBD remains strong and vibrant - as well as jobs in various focused outer metropolitan areas requiring across-city commuting by some people
- many people will continue to prefer the urban fringe and/or country townships as lifestyle choices, enjoying the separation between job and house, and these living environments must continue to be provided for

UDIA supports planning changes that allow mixed use activity – commercial and residential in many areas that can be supported by retail and transport services. We also support the draft Plan’s “decentralization” approach to seeding employment in corridors and TODs, as long as the primacy of the CBD can be maintained.

The main obstacle to achieving the draft Plan’s goals for mixed-use environments will in many areas be the conservative approach taken by local Councils and the restrictive planning controls that are often imposed. The UDIA looks forward to the State Government taking a leadership role in removing this obstacle.

### **New Land Development, P3**

UDIA strongly supports the plan for creating additional priority land for growth areas – both infill and fringe - that will be based on the principles of mixed use development, higher densities and proximity to transport corridors.

UDIA supports the role of the State Government in controlling the structure planning and zoning of growth areas. The timely availability of land for residential development is critical to the success of this Plan; its availability should not be delayed by interference/delay by local Councils taking little direct responsibility for the population growth and the increased demand for housing.

### **Transit-oriented Developments, P3**

UDIA supports the Plan to incorporate improved access to residents via upgraded rail transport corridors and station access. The creation of 13 new transit-oriented developments (“TODs”) and 20 sites that incorporate TOD principles and design characteristics is supported.

However the operation of the market must be recognised and where possible harnessed. It will be many years before the Adelaide market is strongly supportive of higher density housing in many areas of Metropolitan Adelaide. This shift in people’s preference will occur after recognition of the success of the ‘early TOD developments’ that prove to be satisfying to the dwellers and attractive to potential dwellers who have traditionally preferred outer suburban living.

Significantly, however, the market will embrace and support higher density around very many fixed transit stops right now. In many areas along priority rail corridors the only thing stopping delivery of higher density mixed-use development outcomes are the conservative planning rules imposed by local Councils with the agreement of (former) State Governments. In these situations, development supportive of the draft Plan’s goals can be unleashed “at the stroke of a pen”.

UDIA notes that TOD developments cannot be treated as “one size fits all”. Early developers should be supported to construct some larger TODs (eg Bowden Village) but

will require little support to deliver small scale TODs (eg Woodlands Park rail station area) in the early stages of this Plan. This is expected to create different demand from different sectors of the population, and provide ample evidence to potential dwellers to shift their preference for housing types.

UDIA commends the Government for this vision with TODs. We urge the Government to assign funding to the higher-order TODs and begin them as soon as possible, while also upzoning other lower-order TODs to deliver "quick wins" pending delivery of more complex TOD challenges.

#### **Suburbs with Best Practice in Sustainability and Design, P4**

UDIA notes that current inflexible planning frameworks in many local Councils restrict the creative use of house design and use of spaces. Such restrictions also restrict the ability of developers to develop smaller 'affordable housing' and to achieve higher densities.

The use of more varied, substantial and creative street furniture and street art is supported. This will require support to developers to justify this cost that creates a long-term community benefit.

UDIA has already launched its EnviroDevelopment certification for land development that is assessed by a third party as having exceeded standards met by fewer than 80% of developments. These certified developments meet the highest industry standards in management of ecosystems, waste, energy, materials, water and community (access to transport and community services). UDIA's initiative will assist the implementation of the Plan in this respect.

The UDIA supports the draft Plan in ensuring that sustainability does not come at the cost of affordability. We support the concept of the Climate Change, Housing Affordability and Sustainable Neighbourhoods Task Force and request representation on this group as and when it is formed.

#### **Growth of Larger Townships with Infrastructure and Services whilst Constraining Growth in Smaller Ones, P4**

This concept is supported. Great care needs to be exercised when planning such growth areas to ensure the reality of providing sufficient land for housing and related services occurs. The planning authorities will need to resist succumbing to excessive local interests in retaining 'their spaces' whilst denying the growth needs for additional people. All towns have 'distinct character to some extent' - that is why they largely exist - so the determination of the property growth townships must occur well ahead of demand for land allotments.

#### **Network of Greenways and Open Space Precincts, P4**

UDIA supports this element of the Plan as long as it is not funded by new cost imposts on the development sector. The open spaces must serve both the local neighborhood and citizens from afar with potential to use such spaces which provide both a recreational outlet as well as an aesthetic and environmentally supportive one. Use of the Open Space Development Fund, or equivalent (for example, by hypothecation of a share of stamp duty and/or property tax revenues), to support the appropriately sized open space needs of the community is favoured. This particularly applies to infill

projects which have recently been under-serviced by open spaces. This factor is considered essential to attract people to live in higher density communities.

#### **Water and Energy Consumption, P4**

UDIA supports the water sensitive urban design concept and the use of recycled water to households. UDIA wants the Plan to support recycled water connection to all households, with responsibility for management of the network to be with a single authority and clearly understood by the community. Such clarity extends to the standards for the network and its various connection points, as well as responsibility for upgrading and connection to other sub-systems developed at different times.

UDIA believes that access to recycled water, and required plumbing to gardens and toilets in dwellings, is essential to support a high quality of housing and community spaces in Greater Adelaide. We ask, however, that implementation be coordinated in consultation with the development sector to ensure affordability impacts are minimised.

#### **Linkage between Plans and Targets**

UDIA supports the Plan as the guiding document for the wider property development industry. The Plan should be upgraded regularly, say annually, without risk of being 'watered-down' over time. Government policies and local council policies and Development Plans (and Development Plan Amendments (DPAs)) should be made consistent with the Plan's details as quickly as possible.

It is essential that the draft Plan's targets – for housing, jobs and population by sub-region and by segment – are applied as a fundamental requirement of all Council DPAs. Any DPA which would frustrate attainment of these targets should be immediately terminated unless and until Development Plan policies are brought into alignment with the targets.

## KEY CHALLENGES

The principal challenge of the draft Plan is delivery. We do not need further debate on principles that have been clearly enunciated since release of the Planning Review in June 2008. We need to move to implementation as quickly as possible.

The following are seen by the UDIA as key issues to be addressed in the implementation process.

### **Maintaining the Focus on Population Growth and Demographic Change, P33**

UDIA agrees that, *"one of the key drivers of the Plan is the inevitable change that will occur to the size and make-up of the population."* We support the requirement of the Plan to include specific strategies (and lower-level actions) to retain and attract working-age people and stem the flow of interstate migration. This increase in net population by 350 people per week for 30 years is a realistic challenge and one which must be a cornerstone of the growth Plan for Greater Adelaide.

To not increase our population, and to not increase our range of services and housing to cater for the younger cohort in our population is a recipe for the eventual decline in the living standards of all South Australians.

### **Avoiding "Death by Planning," Ch E**

The excessive number of layers in the proposed planning process set out in the Draft Plan is of great concern to the UDIA. There is potential for layer after layer of sequential plan to result in delays and uncertainty for the development sector and the community.

The UDIA urges that priority growth areas move directly to a concurrent structure planning and rezoning process. There is no need to prepare costly and time-consuming Regional Implementation Strategies for these areas as all relevant issues should be addressed either in the Plan for Greater Adelaide or in the structure plan itself. Rezoning must be achieved concurrent with structure planning if a timing blowout is to be avoided.

UDIA supports the role of the Department of Planning and Local Government (DPLG) in preparing Structure Plans in growth areas. However this must be done efficiently and without undue delay. We doubt that DPLG will have sufficient resources to address all priority structure plans and we urge that DPLG harness the resources of progressive Councils and/or of proponents themselves to speed up the planning and rezoning process.

The role of DPLG in coordinating plans for land use, infrastructure and a "whole of government" approach by various government agencies, particularly to new growth areas, is critical to the success of this Plan.

Supportive local policies are also essential. Local Development Plans are currently a significant obstacle to achieving density, affordability and transit-orientation, particularly in infill areas. The State Government must force change in these areas. Without intervention in local zoning, the Plan's infill targets will not be met.

### **Implementing the Housing and Employment Land Supply Program, P6, 9, 16**

This is a major requirement of the Plan. The property development industry requires 15 years' known supply of zoned land to ensure it can provide the stock necessary to provide dwellings to the increasing population at affordable prices. It is a matter of great and ongoing concern to the UDIA that the pipeline currently has less than 8 years of zoned supply.

The delays in bringing land to market have been a problem in the past. Some of the current problems with land affordability have resulted from lack of continuity of supply of land in rezoned, ready-to-develop condition (eg delay between release of significant land holding at Northgate and the next northern Adelaide sites). The use of the report against the Housing and Employment Land Supply Program on an annual basis will assist the industry, including local Councils, to identify the need for timely release of land and should provide 'trigger alerts' for timely and low cost planning approvals.

The Department of Planning and Local Government ("DPLG") must monitor the land supply against key indicators in the Plan (particularly the 15/25 supply metric) and report to the industry and the community. However, historically, DPLG's predecessors have significantly overestimated yields and this has fuelled a policy-induced land supply shortage. In future, land supply monitoring should be undertaken in consultation with – and with input from – the industry. UDIA endorses the need for development and use of the Program, but it must be market-informed if it is to succeed.

The drive to achieve a net increase in population of 350 people per week over 30 years is supported. We reinforce the statement in the Plan, "*This growth will need to be carefully managed so that there is sufficient land for the additional housing and jobs necessary to support a growing population.*"

UDIA is keen to assist the DPLG in obtaining this information and annually reporting it. This is a critical component in the Plan. Currently UDIA provides half-yearly reports on land supply, using a sample survey from our major developer members.

UDIA seeks confirmation that the Housing and Employment Land Supply Program will be aligned with targets (by sub-region and by market segment) rather than being aligned to size of allotment (traditional broadacre expectation of lot size is no longer appropriate).

### **Improving Development Plans, P6**

It will be essential to achieve alignment between local Council zoning proposals and the targets and directions set out in the draft Plan. State intervention will be required.

The Draft Plan also notes that "*Councils will need to incorporate infrastructure and service requirements into their plans.* While the UDIA acknowledges the importance of timely availability of infrastructure – transport, water (potable, recycled and sewer), telecommunications and energy – to support the supply of developed land, we remain concerned at the capacity and appropriateness of Local Government to achieve this.

It will be essential that DPLG take a leadership role in driving a "whole of government" approach to aligning infrastructure coordination with the draft Plan's goals and objectives, and in ensuring that Development Plans support this.

The draft Plan discourages any residential building higher than 4-6 storeys outside the City and Bowden. This is nonsensical and works against both Government objectives and industry dynamics. The final version of the Plan should recognise that high-rise buildings will be appropriate in many areas of Metropolitan Adelaide.

### **Providing Transport Infrastructure, P10**

UDIA supports the drive to create a city that retains its charm, nestled between the sea and the hills but in compact form. To do so will require transport corridors that allow efficient use of motor vehicles as well as train and tram travel.

We support the goal of improving transport choice and making public transport as attractive as possible to as many people as possible. However not all housing or employment can be effectively served by public transport, and the majority of people will continue to prefer private vehicles to ensure personal mobility. Infrastructure provision should reflect this dynamic.

Adelaide has many near-city suburbs capable of dwellings of mixed use, with more than two storeys. This drive to higher density dwellings, with mix of suitable retail and commercial dwellings, serviced by frequent and reliable public transport, is essential.

UDIA notes that rail transit corridors must provide reliable, frequent and connected transport services, allowing commuters to travel between linked zones in Adelaide and not just along the single transport corridor, otherwise people will not use it and revert to their existing individual motor vehicles for transport.

### **Managing Climate Change, P11, 18, D14**

The Plan notes *"It is critical to intervene now in the urban form and the built environment to reduce the rate of growth in emissions and to prepare the region to adapt to the likely impacts of a changing climate."* UDIA has prepared several policies that should be incorporated into the Plan.

Greenhouse gas emissions could be minimised associated with urban fringe developments by co-locating dwellings, workplaces and shops and by encouraging developments that promote the use of clean transport options.

Walkways and cycle tracks, as well as storage of cycles, should be included in all significant property developments.

Substantial effort is required to create lifestyles and travel modes with less dependence on the motor vehicle. The creation of reliable, frequent and clean trains, trams and buses is essential to service the Adelaide city centre and large activity centres.

Government investment must continue over a long period of time in major rail infrastructure as a driver of transport-related sustainable development outcomes. UDIA supports property development within walking distance of frequent, reliable and safe rail and bus transport corridors.

UDIA warns against over-emphasis on regulation as a means of sustainability and climate resilience of properties. We see a supporting – but not leading – role for regulation. The EnviroDevelopment certification standards developed by the UDIA should be the mandatory requirements for urban development, to ensure the final built-

form can be located in the best location and orientation to require least 'technology-operated' mitigation of the effects of extreme climate.

New sustainability measures cannot be at the expense of affordability. UDIA supports the Government's proposal to convene a Climate Change, Housing Affordability and Sustainable Neighbourhoods Task Force and seeks direct representation on this group.

UDIA supports the goal of 'zero carbon' ('greenhouse gas emission' is the preferred term) that would be monitored by the Task Force. However setting targets for greenhouse gas emission in developments is difficult without substantial baseline data. UDIA suggests that targets not be set initially but allow 2-5 years for realistic knowledge to be gained on this subject.

UDIA wants to work with government agencies to ensure climate change policy is included in all aspects of planning and development requirements, notwithstanding that such policies should support the efficient planning and development of land without significant cost impost on developers and property owners.

#### **Achieving the New Urban Form, P14**

The Plan requires metropolitan housing to gradually move from about 50:50 infill development to fringe development, to around 70:30. Many experts argue this is very difficult to achieve. This is a critical aspect of the Plan.

The price of land is a compelling reason for property buyers' preference for fringe land with single storey dwellings, and current zoning rules effectively lock out densification in many areas where it can best be sustained. Much direct action and incentives by Government to developers will be necessary to ensure adequate supply of infill allotments and multi-level dwellings in the infill area are provided.

Industry supports this infill challenge. We acknowledge however that the capacity of the industry to produce higher density product will need to be deepened and strengthened to meet this challenge. The industry will require abundant opportunities (particularly by up-zoning of suitable areas) as well as Government investment in infrastructure and public realm. Given a supportive environment, the UDIA is confident that it can work with its membership base to increase the rate of production of medium and higher density housing over the life of the Plan.

We support the role of Land Management Corporation in providing services that cannot be provided by the private sector, to assist the overall development industry. UDIA sees a significant role for the LMC in the 30 year Plan in driving delivery of complex higher density nodes (eg TODs).

There are very few sites located on the major transit routes that will deliver the scale of development envisaged. A Government agency will need to be established, or given the authority, to amalgamate sites on these routes to then be able to interact with the development industry to deliver required housing outcomes together with the prerequisite quality open space and public domain. The Government must budget the funds for this considerable task.

The proposal to change the market and make it acceptable and desirable for people to live in high density urban apartments along noisy major transit routes (eg North East

Road, Port Road, Main North Road, etc.) is a risk to the Plan. Whilst acknowledging that the market perception might alter over time the industry has concern that this new paradigm will be slow to 'catch-on'. Will the Banks and Financiers support such housing? Will buyers aspire to live in it? These are major questions critical to the success of the Plan.

### **Establishing Governance and Implementation Arrangements, P15, 16, 146**

UDIA supports the references in the draft Plan to the use of Ministerial Development Plan Amendments. UDIA strongly supports and encourages the use of Ministerial DPA's to facilitate the ultimate development of growth areas and State significant areas. Where, in other areas of the State, local Councils do not prepare Development Plan Amendments sufficiently quickly the Minister should step in and use Ministerial Development Plan Amendments to deliver the desired outcomes of the Plan.

To achieve the necessary larger land parcels to allow developers a commercial opportunity to create a higher density estate near a transport corridor, or to develop land in a growth area that bridges across at least two local councils, will require a 'Development Authority', with powers to:

- acquire land (including, if justified, to compulsorily acquire);
- complete necessary structure planning of the area to support the desired development;
- arrange suitable zoning in the required time;
- arrange necessary infrastructure in the required time;
- approve planning applications in a timely manner; and
- arrange necessary financial incentives to ensure any development can contribute to the planned population increase in the precinct.

We urge Government to establish an authority with these powers to deliver the TODs. We believe the LMC could be a suitable vehicle for this role (subject to additional powers being conferred upon them – specifically to undertake planning, approve applications and acquire land).

The Department of Planning and Local Government (DPLG) would have an overarching policy and planning role, but is not a suitable agency for delivery of TODs or other urban projects. It is a policy and regulatory body not a delivery agency.

The DPLG should have the lead agency role in implementing the Plan, including:

- preparation of the Implementation Plan for a rolling 5 year period, updated annually;
- coordination of activities and tasks (and budgets) across government agencies;
- preparation of the Housing and Employment Land Supply Program, complete with mechanism for obtaining the appropriate data and reporting it regularly to all stakeholders, including UDIA;
- revision and/or preparation of suitable policies relating to achieving land supply and transport availability and other infrastructure in property growth areas and transit-oriented sites; and
- achieving the zoning of residential, industrial and commercial land in identified land parcels.

UDIA believes that the use of regional forums and Regional Implementation Strategies are not necessary. This only adds another level of bureaucracy that has potential to

delay progress and add costs. That is not to say that regional discussion and consultation is unnecessary. Rather, there is no need for this level of formal structure in the governance of this Plan. Any additional tasks required by the DPLG can be undertaken under their direction by the private sector which has ongoing capacity to assist. Industry has ample incentive to support the DPLG in implementing the Plan.

We doubt that DPLG will have sufficient resources to advance all priority growth areas in the necessary timeframes, and urge Government to find ways of harnessing additional resources to supplement DPLG's capacity. Examples would include allowing suitably progressive local Councils to undertake key investigations to DPLG's standards. Similarly, investigations could be outsourced to proponents to be undertaken to DPLG's standards.

UDIA supports the Plan's commitment to permanent and continuous dialogue between planning authorities, business and industry. Recently some staff in state government agencies and local Councils have refused to engage with developers on issues citing concern they would have a conflict of interest. This can result in their decisions being made without understanding of all of the relevant issues.

#### **Using Structure Plans and Precinct Requirements to Streamline Processes, P16**

UDIA supports the use of Structure Plans and Precinct Requirements to deliver the land-use policies in transit corridors, new growth areas, major activity centres and open spaced precincts on the proviso that these measures will deliver better outcomes faster. We do not want the system bogged down with additional layers of planning, but support the Government in its intention to use structure plans and precinct requirements to speed up existing processes.

The recent experience with the implementation of the Residential Development Code shows a gap exists between the principles and implementation actions. If they are to achieve their goals, structure plans must be driven with strong purpose.

UDIA is keen to provide support to the preparation of such plans.

DPLG must be given resources and capacity to deliver – industry is willing to commission investigations to DPLG standards as a means of speeding up the planning process. UDIA seeks structure planning to commence urgently for priority growth areas – we particularly note that new urban land added to the UGB in December 2007 is still not structure-planned or rezoned in many instances.

Some significant development projects currently underway are located beyond 800m from transport corridors. Market demand exists for higher densities and reduced set-backs, etc. than allowed by local Councils. These developments should be treated like other designated growth areas in the Plan, with DPLG or a specific Authority for the development precinct ensuring DPAs, transport links, density and other built form requirements will allow development to support the Plan.

#### **Investing in Infrastructure, P17, 18, 38**

UDIA is supportive of the recent budgeting for infrastructure, including the upgrade of major freight and passenger transport corridors and services. The Plan will require over half of the proposed growth to be concentrated in transit corridors to contain mass transit

public transport networks. This infrastructure must be constructed consistent with the Implementation Plan. Any delay will adversely affect the Plan.

Each year the State Infrastructure Plan must be updated with requirements for the Plan to achieve its land, housing, population and employment targets over the 30 years. Of particular concern is the delivery of infrastructure to the urban fringe. Necessary core or trunk infrastructure to support the identified growth areas will need to be identified with sufficient lead-time. For example, water, gas and electricity providers should be involved in preliminary planning to ensure their core systems are identified, land designated/ /acquired and equipment ordered/purchased to coincide with the structure planning which precedes the rezoning of the new growth areas. Such planning of land, often over more than one local Council, which might involve various land owners, must be done by a government authority (eg DPLG).

Government must accept responsibility for the timely provision of necessary core infrastructure in the growth areas. This acceptance must be translated into action without delay. Unless SA Water, ETSA Utilities and ElectraNet, Envestra and the telecommunications providers provide the necessary infrastructure to support the planned release of land the Government's Plan will fail.

UDIA commends the Government for its policy of not imposing developer levies. This method for attracting funds from developers of new land has proved to be a dampener of development growth elsewhere in Australia, has fuelled affordability declines and has imposed new costs on those who can in many cases least afford to pay them (ie the current generation of first home buyers).

The development sector is willing to accept the current reality of a case-by-case negotiation with local Councils on appropriate funds to provide for relevant additional/upgraded infrastructure to cater for the increased population, but is strongly opposed to any move to introduce developer levies in any formal sense.

A common set of principles is needed for all local Councils to operate with these negotiations which should not include funding for core or trunk infrastructure, eg a desalination plant to serve the community. UDIA is keen to assist DPLG and local councils to develop a set of key principles for this negotiation of infrastructure associated with new property development.

### **Reforming Land Supply**

Between 7,000-8,000 new dwellings have been built each year in recent years. The Plan requires 10,100 new dwellings each year for the next 30 years. This is a challenge.

It typically takes 12-13 years between initially identifying land as potentially suitable for future urban use and the construction of the first dwelling on that land. It is currently estimated that there is less than 8 years of development-ready zoned land in the supply pipeline. Recent UDIA half-year survey shows that developers expect to supply around 5,000 lots on the fringe next year – well down on the level required to meet Plan targets.

These and other facts confirm there is a pressing land supply problem in Metropolitan Adelaide. Urgent action is necessary. The Plan is an important part of an overall response, but is insufficient in and of itself.

The Plan requires about 60% of all new housing to be within 800 metres of public transport access. This is a major task, necessitating strong intervention by Government in zoning, infrastructure and public realm.

The UDIA stands ready to assist Government as required in its program of land supply reform.

### **Supporting Retirement Living, P36-38**

UDIA notes the lack of detail and reference to retirement living and aged care accommodation in the Plan.

UDIA supports the proposed structure plans and development plans to be provided for retirement housing and residential aged care facilities to allow older South Australians to remain connected to their communities as their needs for support increased.

UDIA proposes the following:

- very low or no density limits be imposed within the development corridors, to allow developers to provide retirement living products of varying types to the market;
- the Community Titles Act be amended to allow by-laws of community titles to specifically provide that community title developments are for occupants of a particular age;
- the "Seniors' Housing Policy" prepared by Connor Holmes at the request of Planning SA in August 2008 with the support of the UDIA Committee be used as a template for developing the detailed Seniors' Housing Policy consistent with the 30-year Plan for Greater Adelaide; and
- amendments to the Development Regulations to ensure retirement development is recognised as a distinct category (rather than being treated as, for instance, "residential flat building").

### **Achieving Water Security, P54, 55, 69**

UDIA agrees that the revised "Water for Good Plan" should be integrated with the 30-year Plan for Greater Adelaide so as to be implemented as a single plan.

UDIA does not accept that (reduction of) water consumption is the major strategy to management of South Australia's drinkable water supplies, as implied in the draft Plan. Nevertheless several recent large developments in SA have included significant reduction in potable water consumption (often 70% reduction from previous levels through creative site works and water retention schemes, etc.). The Government must accept responsibility to provide the necessary volume of potable and recycled water to satisfy planned population in all development sites.

UDIA urges the Government to invest in adequate catchment and distribution infrastructure, as well as the additional source of water from the desalination plant to supplement water from the River Murray. The capacity of Mt Bold reservoir should be increased to ensure that excess rainfall does not simply run out of the catchments.

UDIA is a strong supporter of the lilac pipe network from recycled water sources (treatment plants and aquifers) to distribute non-potable water to houses in new greenfield developments for use on their gardens and in toilets, as well as to community open spaces.

UDIA supports the three critical opportunities listed in the Plan:

- use of water-sensitive urban design (subject to affordability impacts being managed);
- reduced water consumption per household with move towards smaller accommodation; and
- use of non-potable water supplies for irrigating open space.

The industry seeks further consultation regarding the proposal to mandate water sensitive urban design (WSUD) requirements. UDIA is keen to work with the Government to identify appropriate models for WSUD and examples of what this could be. "Better Development Plans" containing such examples of WSUD could be made available to developers from the local Councils. However, unilateral mandating of costly new standards has potential to sacrifice affordability. To this end, we seek a role on the Climate Change, Housing Affordability and Sustainable Neighbourhoods Task Force.

The lilac pipe system must not be mandated until clear policy positions are established for ongoing management including standards for access, connection and maintenance as well as price for use of the system. UDIA seeks a single authority, eg SA Water or another agency, to own and operate the total system, conducting on-property audits of system performance and Department of Health safety compliance checks.

UDIA seeks clarification from the Government on the role of SA Water, or another authority, as supplier of last resort with regard to potable water, sewerage and recycled (non-potable) water. This action must be taken by Government soon to ensure this matter is resolved.

Land should not be released until preliminary studies have confirmed:

- recycled water is available (source known and quantified)
- reliable source from which to distribute the required volumes of recycled water
- governance structure including ownership and management of the lilac pipe system

### **Housing Affordability, D7**

UDIA is concerned at the rising price of land in South Australia. The costs to develop land associated with land stock purchase price, infrastructure investment and various costs to achieve planning approval from local councils or other planning authorities are factors. Affordability is much dependent upon land supply and the regulatory regime that causes delays and excessive costs.

Integration of public investment in core/trunk infrastructure with the other aspects of the Plan is essential. The availability of 15 years' residentially zoned land, supported by the essential infrastructure, is critical to ensure housing affordability of all types of dwellings remains an incentive to retain people and attract others from other states of Australia.

The role of Land Management Corporation in parcelling land to make development efficient in TOD zones is critical to ensure this form of development can proceed in the various TOD locations.

Much of the land in many local Councils should be up-zoned swiftly to allow higher density dwellings in existing residential areas. This acceptance of smaller allotments and higher rise dwellings will also contribute to improved relative housing affordability.

The Department of Planning and Local Government should assume responsibility for local councils removing impediments to this change in dwelling type.

The expectation that 15% of all dwellings be 'affordable housing' requires support from Government. Property developers cannot be expected to arrange cross-subsidy for the lower-priced 'affordable housing' by raising the prices of 'other housing'. Local Council plans and/or Structure Plans engineered by DPLG should account for this.