

**The Presiding Member  
Development Policy Advisory Committee  
GPO Box 1815  
Adelaide 5001**

17 July 2015

## **Dear Presiding Member and DPAC Committee Members**

### ***Re - Park Lands Zone Development Plan Amendment***

Thankyou for the opportunity to make a submission on behalf of the Community Alliance SA Inc which is an umbrella group that represents community resident associations with the object of Putting the People Back into Planning and Development in South Australia.

The Community Alliance asks that DPAC to disallow the Parklands Zone DPA on the following grounds:

The DPA acknowledges that:

*The current development controls in the Park Lands Zone sees all development being non-complying unless it is specifically listed. Thus, the current planning policies for the Park Lands Zone do not support critical public infrastructure projects such as the O-Bahn City Access Project.*

And that the need for the amendment is:

*The primary purpose of this DPA is to amend land use policy within the Park Lands Zone of the City of Adelaide, to ensure that the tunnel/underpass, pedestrian footbridges and structures associated with the O- Bahn City Access Project and other public infrastructure projects can be assessed on merit.*

*The proposed DPA will see the removal of 'public infrastructure projects' from being considered as 'non-complying' forms of development in selected parts of the Park Lands Zone, reducing some of the uncertainty associated with the assessment process of such critical projects in these areas.*

Changing the method of assessment from non-complying to merit based assessment is completely un-warranted and the DPA demonstrates a serious lack of professionalism. Changing the goal posts is completely unwarranted and smacks of opportunism. In addition how can the government plan to drive bulldozers over the Parklands? We understand that the Parklands are heritage listed.

In the Parklands Zone DPA there are numerous claims made without any evidence or facts that substantiate the claims such as:

- Amending Development Plan policy to enable critical public infrastructure projects such as the O-Bahn City Access Project to be delivered.
- Improving travel times and access into the CBD from the O-Bahn bus users, making it easier for residents of the north-eastern and north-western suburbs to seek employment and access education within the City of Adelaide.
- Improving safety, reducing traffic congestion and improving the flow of traffic on the City Ring Route, thereby allowing commuters and freight transport to travel more efficiently.
- Ensuring that improvements to policy are supportive of future population growth and possible enhancement to accommodate growth in Adelaide's north-eastern suburbs.

For instance how will travel times be improved? How will public safety be improved? How will freight movements benefit? The DPA refers to population growth but where are the population projections.

The DPA suggests **possible** enhancement to accommodate growth in Adelaide's northeastern suburbs. The Community Alliance SA contends that this is not acceptable. **Possible** suggests that no evidence exists 'possible enhancement to accommodate population growth' might happen or it might not. The expenditure of significant amounts of public money on such a basis is completely irresponsible and unacceptable because there is no supporting evidence.

The DPA continues to make additional unsupported claims such as:

- Protecting the transport functionality of the existing and planned O-Bahn corridor by enabling the construction of infrastructure associated with this extension.
- Enabling development that will improve the efficiency and speed of bus services within the transit corridor, and is anticipated to encourage further commuters to utilise public transport within the north-eastern suburbs of Adelaide.
- Enabling future development that will improve the functionality of road and rail corridors through planning policy in Development Plans.
- his DPA will support the strategic priorities listed above by:
- • Amending existing policy provisions to be more flexible to enable the timely construction of the O-Bahn City Access Project to maximise the transport benefits to the community and to freight movement, whilst minimising disruption to adjoining businesses, park users and annual community events.

For instance, what does 'protecting the transport functionality of the existing and planned O-Bahn corridor' mean? How will approving the DPA 'enable development that will improve the efficiency and speed of bus services within the transport corridor? This just another claim without any supporting evidence.

The DPA goes on to claim

This DPA will support the key strategic infrastructure projects for improvements to freight transport movement and public transport improvements by:

- Allowing for the improvement of high capacity, high frequency corridors including bus priority measures on core routes and in the inner areas by improving O-Bahn bus route to access to the city centre.

- Supporting connectivity and accessibility as a priority by improving travel times and reducing on-road delays between Hackney Road and the city centre.
- Ensuring that the future EastLINK Tramway extension service can be accommodated.

The Community Alliance SA is seriously concerned that such claims are completely unsupported. For instance reference is made that travel times and reducing delays will be improved but there is absolutely no evidence or traffic modelling to back this claim up. With such a serious lack of evidence for these and many other claims made in the DPA the obvious question is is – How can this project be justified? Where is the cost benefit analysis on the O-Bahn major project? Might light rail be more appropriate option? This publically funded project must be evidence based and supported by facts and good research and modelling. This document clearly demonstrates no research or hard analysis or rationale.

On the evidence displayed in the Park Lands Zone DPA it has no merit what so ever and the Community Alliance asks DPAC to reject the DPA. A very large sum of public money is needed to fund the O-Bahn project and due to the lack of evidence on numerous serious unsubstantiated claims the DPA must be rejected by yourselves.

The consequences of changing assessment from non-complying to merit assessment as proposed in this DPA are very serious and will have long term adverse consequences that cannot be remedied. The people of South Australia will be stuck with an ill-conceived major project if DPAC approves the Park Lands Zone DPA – in the end the tax payers of SA will pay for it – dearly. The Community Alliance SA respectfully asks that DPAC reject this DPA.

The Community Alliance wishes to be heard at the public meeting.

Yours Faithfully

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[www.communityalliancesa.org.au](http://www.communityalliancesa.org.au)

*We are an umbrella organisation representing resident and community groups Dedicated to 'Putting the People back into Planning and Development' Our goal is a planning and development process that is accountable, transparent and sustainable, and that guarantees genuine community consultation*