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Community Alliance  
South Australia

To Development Policy Advisory Committee (DPAC)  
& the Dept of Planning, Transport and Infrastructure (DPTI)  
GPO Box 1815  
Adelaide SA 5001

2<sup>nd</sup> August 2013

### **Submission on the Playford Growth Project (Structure Plan and draft DPAs)**

Dear DPAC Members and DPTI staff,

The Community Alliance SA is an umbrella organisation comprised of a large number of resident and community groups. We are concerned with the lack of genuine community engagement and participation in the current planning and development system. Our aim is:

#### **'To put the people back into planning and development'**

The Community Alliance SA would like this to be considered as a submission on both the draft *Playford Growth Area Structure Plan* and the two Ministerial Development Plan Amendments (DPAs) so far proposed to implement the Playford Growth Area Structure Plan (all of which were released for public consultation on 28<sup>th</sup> May):

1. Playford Urban Growth Areas (Angle Vale, Playford North Extension and Virginia) and General Section Amendments DPA (Residential DPA)
2. Greater Edinburgh Parks Employment Lands DPA (Greater Edinburgh Parks DPA).

We note that DPTI considers the Playford Growth Project to be in line with the 30 Year Plan for Greater Adelaide, designating areas to the north of Adelaide to provide new housing for 100,000 people and land designated for employment. Also, that DPTI considers that together with the Playford Growth Area Structure Plan, these provide the planning framework for Development Plan Amendments (DPAs) to rezone land to bring about the Playford Growth Project.

The Alliance opposes the Structure Plan for the Playford Growth Project and the proposed rezoning of land by the two DPAs, in their current form and at this time, for the following reasons.

#### **1. The need for the land to be rezoned at this time is questionable**

The Alliance questions the need for more rezoning of greenfields sites at this time as outlined below.

##### **a) Having many greenfields areas rezoned at one time prevents the facilitation of orderly development**

To the best of our knowledge, there are large areas of greenfields land already rezoned for development at Mt Barker, Murray Bridge, Buckland Park, Gawler East and southern areas of Gawler. All or most of these sites are only just beginning to be developed, and do not have adequate infrastructure provisions

in place. Plans are also underway for rezoning land to enable a massive development for 100,000 people at Roseworthy ('Proposals to achieve the early development of Roseworthy Garden Town, Light Regional Council, October 2012'). News articles have reported that this project is undergoing the structure planning phase, led by DPTI (eg The Bunyip 20<sup>th</sup> Feb 2013 page 11).

We also question whether the rezoning of greenfields land that is occurring is in line with the statement in the 30 Year Plan that "there will be a 25 year rolling supply of land, and a 15 year supply of zoned land" (page 17). In addition, we believe that a 15 year supply of zoned land is excessive, and not likely to facilitate orderly development.

In terms of strategic context, the Strategic Investigations Report for the Playford Growth Area Structure Plan merely refers to the 30 Year Plan, the *Strategic Infrastructure Plan for South Australia 2005/06-2014/15* and various other documents. However, there seems to be little to further the scant strategy in terms of timing and infrastructure provision etc for these large-scale developments.

We believe there must be more regard to the 'bigger picture' for the State, before more greenfields land is rezoned including that identified in the Playford Growth Project. A failure to do this is likely to result in piecemeal, or stalled development, and will increase the likelihood that infrastructure is not provided when needed.

**b) Too much greenfields land is being rezoned in Greater Adelaide and this does not fit with the need to move away from sprawl**

We would like to draw your attention to the figures used in the 30 Year Plan, for population growth targets in the different regions of Greater Adelaide:

*Figures taken from the tables in Chapter E of the 30 Year Plan ('Regional targets and Directions')*

Location	Net additional population		Gross land supply (hectares)
	Within corridors	Outside corridors	
Adelaide City	27,300		330
Eastern Adelaide	14,600	23,100	2230
Western Adelaide	62,100	20,900	4650
Northern Adelaide (inc. Playford Growth Project & Buckland Park)	Infill: 46,300 Fringe: 14,300*	Infill: 14,400 Fringe: 81,300* Townships: 12,700	9950 (incl 4290 fringe, 1550 employment lands & 730 townships)
Southern Adelaide	Infill: 36,400 Fringe: 12,000*	Infill: 24,000 Fringe: 8,400* Townships: 1,200	5085 (incl 70 fringe, 115 regional employment lands & 60 townships)
Barossa	Fringe: 74,400*	Fringe: 14,800* Townships: 20,800	6000 (incl 4440 fringe, 1000 townships)
Adelaide Hills & Murray Bridge	29,000		2010
Fleurieu	22,000		1690

The target figures for fringe growth (marked with an asterisk, \*) show a total increase in population of 205,200, which is 37% of the 560,000 overall population 'target' in the 30 Year Plan. However, the remaining 63% does not wholly comprise 'infill development' as implied in the 30 Year Plan with the statement:

"new metropolitan housing will gradually move from the existing 50:50 ratio of infill development to fringe development to a ratio of about 70:30 in the last years of the Plan period" (page 14).

In addition to what has been classed as fringe growth, there appear to be further greenfields developments (not 'infill development') including:

- the townships growth planned for Northern Adelaide (12,700).
- the growth planned for the Adelaide Hills (including Mount Barker) and Murray Bridge (29,000).
- the growth planned for the Fleurieu area (22,000)

Also, the actual rezoning of greenfields land that has occurred or is in the pipeline appears to be catering for larger population growth targets than those stated in the 30 Year Plan. For example, in the Barossa area, the population figures add up to at least 141,000 rather than 110,000 as stated in the 30 Year Plan:

- land has been rezoned at Gawler East (10,000)
- land has been rezoned in the southern areas of Gawler (10,000).
- land in Concordia has been earmarked for 21,000 people (15,000 from changes to the Urban Growth Boundary in 2007 and an additional 6,000 in the 30 Year Plan).
- there are plans for a very large greenfields development at Roseworthy for 100,000 people
- it is not clear from the 30 Year Plan which areas the population target of 20,800 for townships refers to, and a large proportion of it may be greenfields developments.

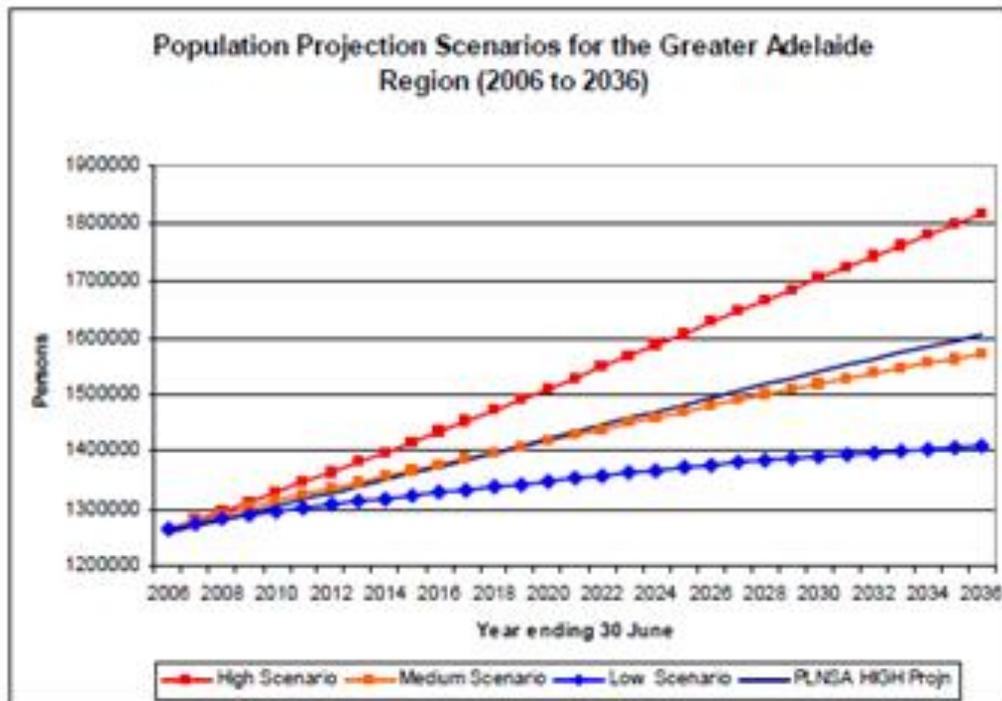
The actual population target for greenfields sites identified in the 30 Year Plan is therefore likely to be in excess of 299,900 people, or 54% of the total population target for Greater Adelaide. (205,200 stated 'infill' growth; 63,700 townships and other greenfields sites; and at least 31,000 planned growth that is outside of the stated figures in the 30 Year Plan).

As the Minister for Planning has himself said, the State needs to move away from sprawl, and adequate growth can occur without it. This can work very well if done sensitively, with thorough background research and genuine community engagement. We do not believe this is happening.

**c) The population targets in the 30 Year Plan need to be reviewed, and if inflated are leading to rezonings at a higher level and a higher rate than is appropriate**

We believe the population growth figures used in the 30 Year Plan need reviewing. It was shown on page 17 of the Growth Investigation Areas Project (2009), which was only released publicly this year, that the population growth target of 560,000 over 30 years that the 30 Year Plan is based on was taken from a high population projection scenario:

Figure 4.1 Population Project Series for Greater Adelaide Region (2006 – 2036)



Under the high scenario an increase of 258,000 net additional dwellings will be required in Greater Adelaide (plus Murray Bridge) over the period of the '30 Year Plan for Greater Adelaide' to accommodate a projected increase in population of approximately 560,000 people (assuming a decline in average household size over the life of the plan from 2.36 to 2.30 people per household.)

If the high scenario does not match current predictions, then this would reflect greatly on the need to rezone more land at this time, only a few years after the 30 Year Plan was finalised.

We would like to see a review of the population targets in the 30 Year Plan to bring them in line with current figures. We also note that on page 195 of the 30 Year Plan, it states that: "An annual monitoring, evaluation and reporting system will be implemented to assess the progress and result of implementing the Plan.....the targets may need to be adjusted to meet changing conditions".

Has this been done and are the reports publicly available?

2. **A better process should have been used to develop the Structure Plan, and the Planning Strategy (30 Year Plan) that the Playford Growth Project is based on**

a) **Community engagement**

The draft 30 Year Plan, as a volume of the SA Planning Strategy, was released in July 2009 and underwent a period of 13 weeks public consultation, during which time the general public was able to make submissions.

The level of consultation in no way matched the magnitude of what the Plan represents, in terms of the impact on the State and existing residents and communities. Many communities were left feeling the 'consultation' was little more than 'informing' as no feedback was received and few and minor changes were made to produce the final Plan.

The lack of genuine consultation and transparency in the research documents produced during the investigations for the 30 year plan was very poor. For example, the land supply on the fringes was

identified by a group of consultants in the Growth Investigation Areas report, which did not undergo a public consultation process and was only released to the public this year.

The lack of transparency also undermines the credibility of the Plan's assumptions regarding population growth, despite it being presented as a 'non negotiable' basis for pushing the rezoning of greenfields sites in what we believe is a premature fashion.

Likewise, whereas the Government states that the Playford Growth Area Structure Plan and associated DPAs are the result of 'a 3 year-long consultation, investigation and planning process with Playford Council, residents and other key stakeholders', the consultation process seems to have been quite minimal with the public at large simply receiving documents at the end of the three years, and given little more than two months to provide comments.

It is disappointing that while the Expert Panel on Planning Reform appears to be undertaking intensive community consultation/engagement on the review of the planning legislation, no real engagement is conducted by the Minister for Planning in the process of Ministerial DPAs such as these, which will have an immediate effect on future sustainability.

In contrast, the Community Alliance would be much more accepting of a Planning Strategy, and associated projects and DPAs, coming from a planning system where governing bodies, developers and communities come together to enter a meaningful dialogue and learn from each other, with the communities engaged from the onset and actively involved in the planning process.

#### **b) Integrated planning**

The 30 Year Plan only minimally addressed 'big picture' issues such as infrastructure, transport planning, food security, employment etc. The Playford Growth Project is based on the 30 Year Plan and is flawed as a result of the failure of these big picture issues to have been addressed at the planning strategy phase. For example, while the Edinburgh Parks DPA aims to rezone land to allow for employment activities, there is little in the way of thorough investigations and provisions to ensure that this occurs. Also, large parts of the land to be rezoned to bring about the Playford Growth Project are currently farmland or used for horticulture. There appears to be little or no consideration given to classification of land of productive capability in the longer term in the investigations justifying the release.

We also question the ability of the Government to address the enormous challenges associated with the planned growth, in particular those of providing employment, transport and other infrastructure, and any needs or relocation of farming businesses.

In contrast, we would support a Planning Strategy and associated projects and DPAs, that comes from a planning system that delivers integrated planning, based on high quality research, and which integrates early on the planning process issues such as transport planning, infrastructure provision, environmental and social aspects, sustainable design, employment and economic viability.

#### **Conclusion**

We note the statement on page 195 of the 30 Year Plan:

"A decision to update the Plan annually rather than conducting a full review every five years was one of the key reforms in the 2008 Planning Reforms. An annual monitoring, evaluation and reporting system will be implemented to assess the progress and result of implementing the Plan.....the targets may need to be adjusted to meet changing conditions".

We ask that the Playford Growth Project and associated DPAs be put on hold, until a better planning system is established and the 30 Year Plan undergoes a rigorous review process, including and beyond what is stated in the Plan itself.

This might include a review of future growth areas identified in the 30 Year Plan and the revisiting of more development in the true regional areas of South Australia, so that more could be done for the neglected or even 'dying towns' more distant from our capital, rather than continuing the large-scale sprawl of 'Greater Adelaide' in areas such as Mount Barker, Playford and Gawler/Barossa.

Thank you for your consideration of our submission. We would also like to advise that a representative of our organisation would like to speak at the public meeting, to be heard by DPAC, on Tuesday 3<sup>rd</sup> September at 7pm at the Shedley theatre in Elizabeth.

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