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Engaging for Reform



The Hon. John Rau MP
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide
SA 5001
Submitted via email to dpti.30yearplan@sa.gov.au

21st October 2016

RE: The Draft 30-Year Plan for Greater Adelaide 2016 Update

Dear Minister,

The Community Alliance SA is an umbrella organisation and acts as an advocate for community and resident groups concerned with planning and development in South Australia. Our goal is a planning and development process that is accountable, transparent and sustainable, and that guarantees genuine community consultation. Our aim is to:

'Put the People back into Planning and Development in SA'

The Community Alliance was formed in 2011 in response to growing unrest with planning policies and decisions that excluded the community and the views of residents. One of the most contentious issues, affecting communities across Greater Adelaide, was the adoption of the 30-Year Plan in 2010. The consultation process was widely condemned as being inadequate and biased towards predetermined outcomes. The public was only involved in the final stages and consultation only led to minor changes in what was to become a most unpopular Plan.

"The 30-Year Plan is a developers' plan - not the people's plan"

(Member comment made at a workshop; from the Community Alliance SA submission to the Expert Panel on Planning Reform, October 2013)

It is disappointing that the draft Update is now simply released for consultation and will be released in its final form in only two months or so. The public has had no previous opportunity to participate or contribute and is now presented with a draft Update that has not been developed with public involvement. This is in contradiction with the statement that -

*"The draft update to *The 30-Year Plan for Greater Adelaide* has been designed to be a collaborative effort between the State Government and the people of South Australia."*

(Draft Update p142, Next Steps)

The draft also refers to the process leading up to its release –

“This draft document has been developed through extensive conversation workshops involving representation from government agencies, all 27 councils, industry bodies and community stakeholder groups. Now it is time to continue the conversation with the broader community.”

(Draft Update p142, Next Steps)

As one of the community stakeholder groups, the Community Alliance was represented on the 30-Year Plan Update Reference Group. While the opportunity to participate in the process was appreciated, the involvement was limited and the Reference Group was only invited to meet and give input on two occasions (May and October 2015).

The Community Alliance is now taking the opportunity to give written feedback on the Draft 30-Year Plan for Greater Adelaide 2016 Update.

The overall aim of having a more compact city and accommodating growth within Adelaide’s existing footprint, is a good one. The current (2010) 30-Year Plan nevertheless allows for significant growth on the fringes, and targets the City and well-established character suburbs and main streets for medium to high-rise development. These strategies have been very unpopular and market forces have shown there is already a surplus of these types of development. The Update should be an opportunity for the broader community to be engaged in the conversation on how to improve outcomes in these areas, as well as to identify better development opportunities.

However, it is difficult to respond to the draft Update while its status in relation to the current Plan is somewhat unclear. The current Plan more comprehensively describes its function and context, and what is envisaged for Greater Adelaide’s future form. The draft doesn’t state upfront what aspects are intended to be replaced or to remain, and this appears in limited form on page 28 -

“With this in mind, as well as refreshing the content, we have taken the opportunity to make the Plan more graphical, contemporary, accessible and easier to read.

Based on feedback from professionals and the community, as well as advice received during the extensive consultation by the Expert Panel for Planning Reform, we have made the Plan more concise, reducing the number of targets and policies to make the Update easier to benchmark and measure (Figure 1.5).”

Figure 1.5 Comparison between the 2010 Plan and 2016 Update

2010 Plan	2016 Update
3 Objectives	3 Objectives (unchanged)
14 Principles	14 Principles (unchanged)
89 Targets	6 Targets
16 Policy Themes	14 Policy Themes
238 Policies	120 Policies
153 Regional Directions	No Regional Section (this section will be revisited as the new planning system is implemented).

(Draft Update p28, How to read this Update)

The “Regional Directions” form a major part of the current 30-Year Plan and showed in 2010 how the Government actually intended to implement planning changes. The Directions gave indications of planned growth areas, within the City and suburbs and on the fringe, with target population growth figures for each area. With these to be “revisited as the new planning system is implemented” (Table 1.5 above), it is difficult for the Community Alliance to give adequate and meaningful feedback at this point on the draft Update with its revised “targets” and “policies”, which are very general in nature.

The Community Alliance has been told verbally, by planning department staff, that these Directions are to be developed with “local area planning” and that this will be substantially driven by local councils and their communities. The draft Update briefly mentions “local area planning” in reference to a short term (1 to 2 years) action to “ensure that interface issues are adequately managed” and to the identification of “appropriate locations for medium and high rise buildings; sensitive infill and areas of protection; and where there should be minimum and maximum height levels” (page 23, and action A10, page 54). The draft Update does not describe the process and gives no assurance that communities will have much input. These omissions should be rectified.

Compounding this problem, just 6 years into the life of the current Plan, almost all of the targeted growth areas for the next 30 years (or even longer) have already been rezoned to allow new or higher density development (the City, inner suburb corridors, Glenelg, Mount Barker, Gawler East, Playford, Buckland Park, Two Wells etc).

Rather than facilitating orderly and appropriate development, this is already allowing *ad hoc* and out-of-character development, without adequate associated infrastructure. The draft Update has some limited recognition of the issues faced in its introduction -

<p>“Several of the more challenging questions arising from development within existing urban areas have also been addressed, including:</p> <ul style="list-style-type: none"> • how can these suburbs grow in a way that is acceptable to communities? • how do we ensure neighbourhoods contribute positively to our quality of life, with access to quality 	<p>public transport, community services, public open spaces and employment?</p> <ul style="list-style-type: none"> • how can we manage interface issues between higher densities and traditional low density suburbs rich with valued character and heritage?” <p>(Draft Update p10, Our 30-Year Plan)</p>
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The Community Alliance recognises the need to identify new and better development opportunities, rather than continuing sprawl and destroying our character suburbs. However, a lot of the damage has already been done. There are now major challenges in supporting the growing greenfield areas, protecting our character suburbs, and guarding against *ad hoc* development, while trying to attract investment in developing major infill areas that may seem less desirable or more costly to develop.

It will be difficult to reverse the damage done, and the Update seems to merely skim over the issues with its very general “targets” and “policies”. These appear superficially to be good ideas but, on their own, they fail to properly address the planning and development problems now faced by Greater Adelaide and its communities.

Furthermore, it is difficult to comment on the draft Update without knowing how it will be implemented. The planning system is in a state of flux with many unknowns, including on how much involvement communities will have in future planning decisions that affect them, as described in the draft Update -

“The Plan will be delivered through a range of new tools that will be progressively introduced with the introduction of the new *Planning, Development and Infrastructure Act 2016*.

The policies will be implemented by the new State Planning Policies and the Planning and Design Code. A Community Engagement Charter will also be developed to set benchmarks for meaningful and genuine engagement with communities, particularly in the early stages where planning policies are being formed and tested.”

(Draft Update p125, Our policies, actions and targets)

As the focus shifts towards more infill in major sites and within existing suburbs, it is vital that communities and local councils be included in genuine and collaborative discussions about where and how development should occur. Unfortunately, the planning reforms to date lead us to believe that councils and communities will be substantially excluded from the planning decisions that affect them.

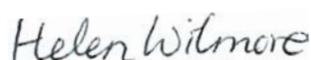
In the limited consultation timeframe, and with so many unknowns, it is not possible to respond in detail to the draft Update. The appendix to this submission gives further brief detail on what is missing or not adequately addressed in the draft Update, as well as some input on aspects that are supported and brief comment on the draft revised “targets” and “policies”.

In addition, the Community Alliance gave its views on transport planning in 2013 in its [submission on the Integrated Land Use and Transport Plan](#). Staff from the planning department have informed us verbally that the basis of the ITLUP has been integrated into the draft Update. The relationship whereby the ITLUP and the 30-Year Plan are “integrated” should be clearly spelt out in the draft Update.

Lastly, the Community Alliance SA regrets that it isn't able to adequately cover the significant issues of climate change and the environment that should be addressed in the 30-Year Plan, and which are of great importance to our members. Our Councils are adopting climate change adaptation plans, including assessing the risks and improving the capacity to respond to the impacts of climate change. State planning strategies should put mitigation first.

Thank you for the opportunity to comment on the draft 30-Year Plan for Greater Adelaide 2016 Update. The Community Alliance SA looks forward to future engagement opportunities relating to the Plan and the ongoing planning reform process.

Yours sincerely,



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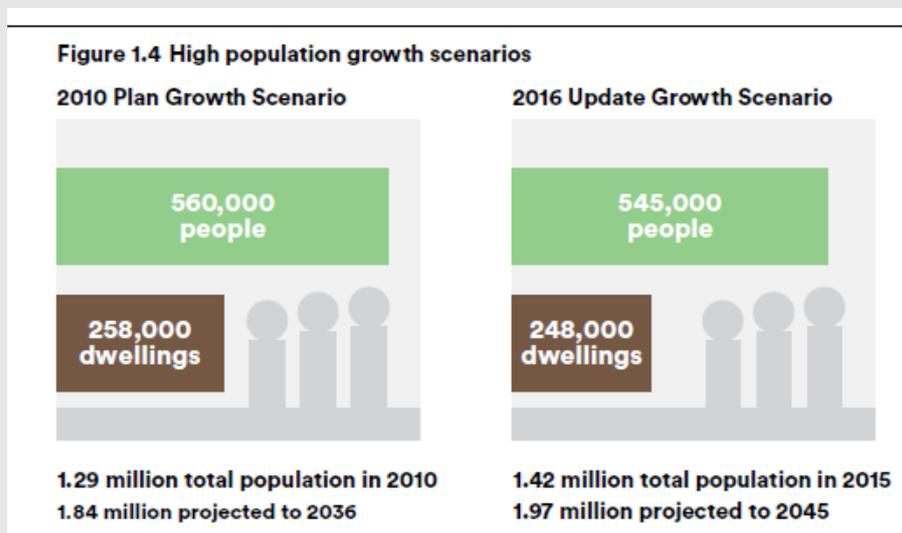
APPENDIX

1. Assuming a high population growth scenario will continue the flawed process

The 30-Year Plan adopted in 2010 was based on an assumed high projection population growth figure. There has been no public discussion on what a sustainable population might be for Greater Adelaide and South Australia, or how to influence population growth. These flaws led to major criticism of the Plan and of the ensuing policies aimed at rapidly rezoning both city and fringe areas for residential growth.

Although the assumed population growth rate has now been revised downwards, the Update is based on the same flawed process, and uses the high series population projection scenario, this time extrapolated to 2045 -

“The revised population growth scenario** is that Greater Adelaide will grow by up to 545,000 people (this is almost 350 per week) by 2045... Refer to Figure 1.4.”



(Draft Update p17, Why the Update?)

There is no justification for using the high series (other than not wanting to get “caught short”), and the medium series should be used instead, which according to the Australian Bureau of Statistics is “considered to be the likely outcome based on past trends”. Even then, the Plan should be well designed and able to respond to a range of scenarios, with trigger points as actual population growth occurs, allowing for sequencing of developments and associated infrastructure. This forward and clever planning is lacking from both the current plan and the Update -

“The Update will continue to use a high population growth scenario. This is to account for the often long lead-in times required to establish new communities and renew existing suburbs. Quite simply, we want to be prepared for the challenges that the future might bring.”

(Draft Update p17, Why the Update?)

The reality is that more than sufficient land for decades to come has already been rezoned for residential development and this is recognised in the draft Update -

“.....the 2010 Plan targeted a 15-year supply of zoned urban land on the fringe and through infill and renewal opportunities. This was in recognition of the long lead time required to bring land to market and the need to ensure that land supply can respond quickly to housing demand.”

“The 2010 Plan’s dwelling infill target has already been met” and “ We have more fringe broadhectare land than needed”

(Draft Update p19, Why the Update?)

Unfortunately, the draft Update continues with a policy of having at least 15 years’ worth of growth land -

“P45. Ensure an adequate land supply is available to accommodate housing and employment growth over the longer term (being at least a 15 year period).”

(Draft Update p62, Housing mix, affordability and competitiveness)

A 10-year supply of zoned land (as recommended by the SGS review in 2013) is far preferable to a 15 year supply and is more likely to result in good planning with effective sequencing of large developments and infrastructure provision, and should be coupled with a realistic growth projection scenario. A policy aiming for more than 10 years’ supply of land will continue to reinforce the public’s view that decisions are being made to suit the interests of the development industry.

The current challenges associated with continuing sprawl, the urgent need to protect our character suburbs, and moving towards better and smarter infill, could have been avoided or better managed had a more realistic growth projection scenario been assumed, and if growth had been planned with sequencing and trigger points. The Update should be an opportunity to revisit these issues.

2. Protecting and enhancing character and amenity in our growing City and suburbs

Under the current 30-year Plan, many of Greater Adelaide’s established areas with high character and amenity have been rezoned for increased densification (eg Unley, Prospect, Norwood, Henley Beach Road, Glenelg and many others), including to allow buildings of up to 10 storeys along main streets. In addition, most of the City was opened up to allow further high-rise development, and currently has around 40 high-rise buildings under or awaiting construction, ranging from 10 to 32 storeys (see [DPTI - New investment in Metropolitan Adelaide](#)).

However, the Regional Directions are not open for revision or comment during consultation on the draft Update. As a consequence, it is difficult to know what areas are being referred to or envisaged as targets for future growth. For example, the draft Update proposes policies to -

“P4. Ensure that the bulk of new residential development in Greater Adelaide is low to medium-rise development with high-rise limited to the CBD, parts of the Park Lands frame, significant urban boulevards and other strategic locations where the interface with lower rise areas can be managed.

P5. Encourage medium rise development along key transport corridors, within activity centres and urban renewal areas that support public transport use.”

(Draft Update p38, Transit corridors, growth areas and activity centres)

From the glossary, draft Update p152:

Low rise = Buildings of between one and two storeys in height

Medium rise = Buildings of between three to six storeys in height

High rise = Buildings of more than seven storeys in height

Rather than commenting directly on these policies, the Community Alliance would like to point out particular issues which should be addressed:

- There is already a glut of high-rise apartments in Australian cities, with a shortfall in family friendly dwellings (Australian Population Research Institute, Research Report, March 2016). The Chair of the Property Investment Professionals of Australia recently warned that investors should avoid medium and high density apartments in most Australian markets including Adelaide (InDaily, September 14th 2016). Furthermore, the Property Council has argued that people don't want or need high rises in Adelaide and that, unlike its interstate counterparts, Adelaide can afford to have "*softer mid-level (5 to 6 storey) development that has greater open space and social amenity*" (Advertiser, November 14th 2013). There is some recognition of this in the draft Update -

“This Update seeks to better enable additional housing types (the ‘Missing Middle’) beyond our plentiful supply of three or more bedroom detached houses and multi-storey apartments.”

(Draft Update p17, Why the Update?)

The draft Update should provide the opportunity for a public review of high-rise policy for the City, particularly in relation to residential apartments.

- More investigation is needed into appropriate densities and building heights for established character suburbs and main streets. Buildings above 5 storeys are unlikely to be necessary or appropriate in established suburbs and high streets outside of the CBD. There is a compounding problem with the trend for multi-storey developments to be given approval even when proposed heights are well above the maximum specified in Development Plans.

High rise apartments are particularly inappropriate in a high street setting, because they lack human scale, separate people from the street, have poor connectivity with adjoining residential areas, fail to promote a sense of community, can't be designed to be family friendly, and can contribute to poor outcomes for health and wellbeing.

- Policy 31 in the draft Update is to -

“P31. Recognise the unique character of areas by identifying the valued physical attributes of particular neighbourhoods.”

(Draft Update p50, Design quality)

The Community Alliance believes this should be taken further and recommends that the updated 30-Year Plan identifies and recognises Greater Adelaide’s traditional high streets, and includes strategies to protect and revitalise them. As population density increases, these character areas are currently being blighted by inappropriate developments, including big box retail buildings and car parks, as well as high-rise apartments and other developments that are not sympathetic to the existing streetscape and heritage buildings.

The Plan should encourage the adoption of policies for traditional high streets as described in our [Blueprint for Preserving and Enhancing Adelaide's Traditional High Streets](#).

- There is a need for better policies for integrating taller buildings to ensure a human scale and pleasant environment at street level. We recognise that the State Government is now preparing the Capital City Policy Review (Design Quality) amendment, to “reinforce design quality for new development” among other changes.
- A review is needed into whether busy arterial roads are really suitable for higher density residential accommodation, particularly looking at health and social impacts. This should include an investigation of what future roads will be affected as freight accesses the upgraded north-south corridor.
- There is currently uncertainty around the planning and design codes, which are yet to be developed, and whether they will be adequate to protect character and amenity, or whether they will result in areas blending into mediocrity.
- A thorough review is needed into whether the City and inner suburbs have the infrastructure needed to accommodate the planned population increases.
- There is little mention in the draft Update of the threats to our coastline and suburbs in coastal areas, from rising sea levels and severe weather events, including flooding. Low lying coastal areas are identified in map 13 on page 121 of the draft Update and there is an action that only relates to assisting with managing emergency situations, for -

“A45. State agencies to map hazards to be identified as overlays within the Planning and Design Code, including flood, bushfire and coastal hazards.”

(Draft Update p122, Emergency management and hazards)

Western Adelaide councils are currently working to identify the risks associated with climate change, and to develop a plan to assist communities and government in adapting ([Adapt West project](#)).

Meanwhile, the Planning Minister has recently rezoned areas of Glenelg, including to allow high-rise development of up to 12-storeys along the foreshore. In view of Adelaide’s ongoing and serious coastal degradation, including devastation of the dunes and metropolitan beaches, the trend for development along the coast needs to be reversed, and there should be an urgent review of what development is allowed in these areas.

- Policy 87 in the draft Update is to -

“P87. Ensure that new urban infill and fringe and township development is aligned with the provision of appropriate community and green infrastructure, including...”

(Draft Update p50, Infrastructure)

However, strategies are also needed to protect or provide open spaces for existing areas affected by growth. For example, the City of Charles Sturt has less open space than similar council areas - there is a dearth of green space in the western suburbs generally - yet Charles Sturt has lost most of the valued open spaces associated with Cheltenham Racecourse and the St Clair Reserve. This situation currently appears to be worsening, not improving.

3. Better protection for our built heritage

As with the current Plan, The draft Update has very limited recognition of the value of and need to protect our heritage assets (pages 55-58, and policy 39, page 62), both in terms of their historical context and the character that they add to neighbourhoods. The Local Heritage Discussion Paper released in August, and its consultation process, leave us doubtful that heritage will be given the legislative protection it deserves. It is therefore difficult to give meaningful comment on the limited policies in the draft Update, particularly while legislation and other protections are still to be developed as part of the planning reform process. Nevertheless, the following points should be noted:

- The Community Alliance considers that heritage listing should be separate from the development process so that it cannot be compromised.
- A policy should be added to the effect that ‘the scale and contextual treatment of new developments should be informed by heritage properties in the area, and tall building proposals must address the effect on the setting of, and views to and from, historic buildings, sites and landscapes over a wide area’.
- The Plan should encourage the adoption of policies for heritage properties and areas as described in our [Blueprint for Preserving and Enhancing Adelaide's Traditional High Streets](#).
- The Plan should address opportunities for funding the protection and conservation of our built heritage.

For more detailed information on the Community Alliance’s views relating to local heritage, please refer to our submission on the Discussion Paper.

4. Better infill and renewal

In general terms, the aim of the draft Update to provide the 'Missing Middle' housing types is supported. The draft Update implies that these will be the next focus for opening up new areas for increased residential development -

“This Update seeks to better enable additional housing types (the ‘Missing Middle’) beyond our plentiful supply of three or more bedroom detached houses and multi-storey apartments”

(Draft Update p16, Why the Update?)

“Now, the challenge is to identify new development opportunities within established suburbs. Currently, the zoning in many of these areas restricts any increase in the number of housing types (e.g. medium density) being built convenient to jobs and services. This Update supports a review of these planning policies to enable greater density developments in these locations, where appropriate.”

(Draft Update p18, Transit corridors, growth areas and activity centres)

The draft Update proposes a raft of policies (page 62) to facilitate infill development. However, it gives no indications of where and how future infill might be focused. Rather than continuing an aggressive infill policy in established areas, better infill and renewal opportunities should be investigated in a collaborative and open process. For example:

- There are 240,000 theoretical minor infill opportunities across metropolitan Adelaide and 30-50% of this could be realised in housing over the next 30 years (2004 - 2010 Residential Demolition and Resubdivision Report, DPTI, Feb 2013 and; Urban Infill Vs Greenfield Development”, Infraplan, Dec 2013)
- The ability to accommodate growth in the middle ring suburbs with sympathetic medium density development (3-4 storeys)
- Well-serviced 'brownfield' sites could be investigated for remediation

It is hoped that local councils and their communities will provide the main voices, and will make the planning decisions, for future infill development in their areas.

5. Supporting growth areas on Adelaide's fringes

The fringe growth areas in the current 30-Year Plan were selected by a group of consultant planners employed by both developers and government, raising questions about the independence and value of the Plan. Most of these areas have now been rezoned for broadacre developments, and now require further thought to ensure that development is as appropriate and well-integrated as possible, and has the necessary infrastructure.

The draft Update has policies and an action to mitigate against repeating mistakes of the past, to -

“P12. Ensure, where possible, that new growth areas on the metropolitan Adelaide fringe and in townships are connected to and make efficient use of existing infrastructure, discouraging “leapfrog” urban development.”

(Draft Update p38, Transit corridors, growth areas and activity centres)

“P88. Encourage early provision of community infrastructure in fringe and township growth areas to assist in creating a sense of belonging and building community well-being.”

(Draft Update p89, Infrastructure)

“A27. Develop guidelines that identify the appropriate thresholds for community infrastructure for new urban infill and growth area developments.”

(Draft Update p94, Infrastructure)

In addition, the updated Plan should ensure as a priority that problems are fixed for existing fringe developments to:

- improve outcomes at Broadacre developments like those at Mount Barker, Buckland Park and Gawler East, which were given the go-ahead without adequate provisions for necessary infrastructure.

For example, there is only a sketchy structure plan, and no infrastructure agreements in place, for the Gawler East development for around 10,000 people. This is still awaiting agreements on the main road to service the development (the original proposed route was not well thought out and didn't have the backing of the community). There are no commitments or land set aside for schools and other services.

For example, the Mount Barker development will be spread over a large area of agricultural land with 98 different land-owners. The land was rezoned without infrastructure plans or agreements in place (for water, power, sewerage, roads, recreational facilities etc).

For example, it is now a decade since major project status was given to the development of a satellite suburb for over 30,000 people at Buckland Park. The development has been stalled for over 4 years and has recently been granted another 12-month extension for work to begin. The project has been widely condemned since it was first mooted, because of the risk of flooding and high costs of infrastructure needed to mitigate against this, as well as for the isolated nature of the area.

- better target population growth to areas with long-term employment solutions

6. Minimising further urban sprawl

The overall aim of reducing Adelaide's urban sprawl and focusing more growth in the city is a good one, and is supported by the Community Alliance. We are in favour of an urban growth boundary to protect land from urban encroachment, and of its reintroduction that occurred in the form of the "Environment and Food Production Areas" in the *Planning, Development and Infrastructure Act 2016*. The following proposed policy in the draft Update is noted -

“P11. Ensure new urban fringe growth occurs only within designated urban areas and township boundaries, outside the Environment and Food Production Areas, as shown on Map 3.”

(Draft Update p38, Transit corridors, growth areas and activity centres)

It is only regrettable that the previous urban growth boundary was not adhered to and was pushed outwards with changes made in 2007, and again in 2010 with the adoption of the current 30-Year Plan. Because of this, and subsequent zone changes, the area outside of the Environment and Food Production Areas is large and allows Greater Adelaide to continue sprawling for many decades to come.

As a result of the Government's voracity for growth in recent years, almost all of the designated fringe growth areas are now zoned for broadacre development (Mount Barker, Gawler East, Playford, Buckland Park, Two Wells etc). Indeed there is already enough fringe land for at least 30 years ("Urban Infill Vs Greenfield Development", Infraplan, Dec 2013). With future population growth and market demands unknown, and also with smarter planning possible, the current supply could even last 100 years.

The 30-Year Plan assumptions for the scale and rate of land consumption for fringe growth should be revisited. In addition, more can be done to protect our precious land and consideration should now be given to:

- Putting on hold the further rezoning of broadacre fringe land, eg at Roseworthy (now planned for up to 10,000 people) and Concordia (planned for around 20,000 people), the Dry Creek salt fields / Bolivar and Goolwa.
- Development of the State's regional centres
- Legislation to protect the Adelaide Hills, as introduced for the Barossa and McLaren Vale areas

7. More say for councils and communities

The aggressive infill and fringe growth policies to date have led to public backlash in areas all over Greater Adelaide like the City, inner suburbs, Charles Sturt, Mount Barker, Gawler, Glenelg and Victor Harbor. These policies stemmed from the current 30-Year Plan and were realised with various Development Plan Amendments and decisions on development applications that seemed to substantially ignore the wishes of residents. A few examples:

- Charles Sturt lost valuable open space, as occurred at the Cheltenham Racecourse and the St Clair Reserve
- a seven-storey 150-apartment and shopping complex approved for Unley Road, where the height limit in the Development Plan is five storeys
- a modern concrete and steel four-storey development in a narrow side street in an attractive older area of prospect - residents were told that multi-storey developments would be restricted to main roads and not creep into residential areas
- the Makris Group submitted plans for North Adelaide's Le Cornu site, including a sixteen-storey apartment block as well as commercial and retail space - only people living in the immediate vicinity of the site were able to comment
- structure planning for a large broadacre development at Concordia is being undertaken without the community in adjacent Gawler being involved
- the proposal to redevelop the Glenside Hospital site received more than 900 responses in the first round of community consultation. The development is now proposed to have around 700 apartments in 4-8 storey buildings, plus around 200 terrace and townhouse allotments. Nearby residents have expressed concerns that the consultation sessions were very short on detail, and that the main aim appears to be to maximise the number of residences on the site, and hence its economic value, at the expense of producing a quality development

Councils and communities are being progressively side-lined from major planning decisions. The fear is that this will continue with the new planning reforms and the yet-to-be-developed Community Engagement Charter, which won't be enforceable and will only apply to the early stages when planning policies are being formed.

For the updated Plan to be accepted by the community, it must be produced and implemented in a genuine and collaborative process.

In particular, the Community Alliance hopes that communities will be engaged on the “Regional Directions” to be “revisited as the new planning system is implemented”, and involved collaboratively in how targets should be met for the areas in which they live. We note that local area planning is to be undertaken, but the proposed action in the short term (1 to 2 years) gives no assurance that either councils or communities will have much input into the process -

“Local area planning will also be undertaken to ensure that interface issues are adequately managed in the local context. These plans will also identify the appropriate locations for:

- medium and high rise buildings
- sensitive infill and areas of protection
- where there should be minimum and maximum height levels.”

(Draft Update p23, Why the Update?)

“A10. Ensure that local area plans adequately manage interface issues in the local context and identify the appropriate locations for:

- medium and high rise buildings
- sensitive infill and areas of protection
- where there should be minimum and maximum height limits.”

(Draft Update p54, Design quality)

Other important changes will impact on how the Plan is implemented, including unknowns such as the Planning and Design Code -

“A2. Prepare an urban renewal zone (for inclusion in the Planning and Design Code) that includes key policies required for new infill to be sensitively interfaced with existing suburbs.”

(Draft Update p42, Transit corridors, growth areas and activity centres)

“A7. Release design guidelines that showcase how medium density urban development can help create desirable neighbourhoods and streetscapes, particularly in local heritage and character areas.”

(Draft Update p54, Design quality)

There is a danger that these instruments (along with policies outlined on page 62 of the draft update relating to ‘Housing mix, affordability and competitiveness’) will be used to provide a blanket approach to future development, and especially infill, for example through the use of “increased policy flexibility” -

“P38. Facilitate a diverse range of housing types and tenures (including affordable housing) through increased policy flexibility in residential and mixed-use areas...”

(Draft Update p62, Housing mix, affordability and competitiveness)

Instead, these should be opportunities for communities to be engaged in the conversation on how to improve outcomes, and to identify better development opportunities. Furthermore, we believe that local councils are best placed to engage with the community and to make decisions on how growth targets can be met in their areas. It is essential that future development is done sensitively and in the context of local neighbourhoods and desired character, rather than with a blanket approach.