



30 October 2023

Reference: D23/48569

Attention: Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

Dear Sir/Madam

Greater Adelaide Regional Plan Discussion Paper

At its meeting on 23 October 2023, Council endorsed preparing a submission on the Greater Adelaide Regional Plan Discussion Paper.

The key comments from Council’s submission on the GARP discussion paper are summarized below, with detail contained in the submission and attached reports.

Key Comments Submission	
Adelaide Plains Interests	Summary of Comments
Residential and Employment Growth	<p>Council is fully committed in its annual and long-term planning and financial capacity to undertake its role in one of the already fastest growing Council’s in South Australia.</p> <p>Council is generally open to the concept of further growth flagged in the Discussion Paper and acknowledges that further growth will need Council to provide sufficient operational resources to undertake its role in planning for this further growth.</p> <p>Council’s openness is however conditional on further ‘whole of Government’ work to align and integrate State level infrastructure and funding to ensure the foreshadowed growth is serviced, liveable and sustainable.</p> <p>If urban growth is to occur there is a need for infrastructure provision and local employment to keep pace with residential growth.</p>



	<p>While Council is adept at planning for urban growth and is open to further growth within APC, support services and infrastructure provision and funding must provide for the retention of sustainable and liveable communities.</p>
Further Two Wells Growth	<p>If residential and employment growth is proposed at Two Wells as per the Discussion Paper, then demand for services (physical and social) and infrastructure upgrades will increase exponentially and Council and development sector will not be able to fully fund them.</p> <p>The draft Strategy needs to include detailed and timed ‘whole of Government’ infrastructure proposals, both physical and social.</p> <p>Commission is requested to undertake research which shows that the proposed Two Wells housing/employment mix in the context of the Northern Adelaide Plains Food Bowl will lead to realisation of the ability for most residents to live, work and recreate locally. Investigations need to consider public and community transport.</p> <p>The draft GARP should include specific strategies about providing diverse housing mix – including aged, community and social housing - in new growth areas.</p>
Two Wells/Lewiston Rural Living and Animal Husbandry	<p>The draft GARP should include:</p> <ul style="list-style-type: none">• a specific strategy envisaging the Animal Husbandry area continuing.• timing about the progressive lifting of the EFPA of land zoned for rural living/animal husbandry throughout Lewiston. <p>Land supply investigations for the draft GARP should analyse need for progressive release of land and over what timeframe for rural living within the northern region of which Lewiston is part, noting the role of GARP to plan ahead for land supply over decades.</p>



Dublin and Mallala	<p>The draft GARP should provide spatial and timing clarity for growth at Dublin. Growing Dublin's services role is important for increasing agribusiness and visitation to the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP). AIBSNP-WP is recognised as an important part of the Greater Adelaide Open Space System. The role of both Dublin and Mallala is recognised in the Adelaide Plains Growth Strategy.</p>
Productive Land	<p>Council affirms the importance of food and water security.</p> <p>Council requests the Commission consider the following:</p> <ul style="list-style-type: none">• The integrated approach to food and water associated with the Northern Foodbowl Protection Areas Development Plan Amendment of 2018 and the significant investment in the Northern Adelaide Infrastructure Scheme need further time to realise the intended benefits. The draft GARP should contain specific strategies - including spatially applied - to provide ongoing certainty for long term private and public investment.• Enabling productive land for food presents local job opportunities. This is important for residents moving to planned growth to be able to work locally, with the social, less travel, and less emissions benefits.• Unrealised opportunities of food production areas involve tourism and education <p>Council requests the Commission work with PIRSA, experts and the Northern Adelaide Plains Food Cluster, to provide guidance on the nature of food production investigations needed to inform lifting the EFPA. This guidance could be within the draft GARP</p>



<p>Open Space Proposals in Paper</p>	<p>Council supports an updated metropolitan open space strategy.</p> <p>This includes recognising the regional role of the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP) as a key part of the Greater Adelaide Open Space System.</p> <p>With both current planned growth and the future growth flagged in the Discussion Paper, the draft GARP should include a specific strategy about the Gawler River seeking recreation and hazard management outcomes.</p> <p>Council requests the Commission be aware of the following:</p> <ul style="list-style-type: none">• Managing flood hazard is a key outcome for agribusiness and residential interests in the flood plain• Much of the Gawler River proper is in private ownership• Hazard and funding options investigations by the Gawler River Flood Management Authority are ongoing• The Planning and Design Code does not contain policy seeking that the Gawler River land become public land when land division of land involving the Gawler River itself is proposed.• A Gawler River Open Space Strategy was completed in 2009.
<p>Environment Proposals in Paper</p>	<p>The draft GARP should include actions to ensure climate ready and energy efficient building design.</p> <p>The Commission's 'Planning for Climate Change' Brochure¹ outlines various proposals for including for change of the Planning and Design Code that need proper investigation.</p> <p>The current statutory arrangements and Planning and Design Code within Adelaide Plains are lacking with respect to inadequately planning ahead to address the</p>

¹ plan.sa.gov.au/data/assets/pdf_file/0005/1252895/Planning-for-climate-change.pdf



	<p>risk of heat from urban growth. The current experience is extensive use of black roofs and limited landscaping/trees, resulting in facilitation of growth less climate ready.</p>
Infrastructure Planning	<p>We suggest a northern region planning team, possibly as an augmentation to the growth areas infrastructure team within Planning and Land Use Services (PLUS). A northern region planning team should work with Adelaide Plains, Playford, Gawler, Light Regional and Barossa Councils as well as Infrastructure SA on a coordinated approach to planning, infrastructure (physical and social) and funding in the north of Adelaide.</p>
Hazard Management	<p>Significant portions of Adelaide Plains Council are subject to potential inundation/flooding (Gawler River, Light River and Coastal inundation). Any potential for urban growth in APC should consider necessary flood mitigation infrastructure requirements and an appropriate funding strategy.</p>
Private Land Investigation	<p>With respect to private land investigations, the submission outlines the following:</p> <ol style="list-style-type: none">1. Content of Council's adopted Growth Strategy that deals with further investigations of the Hicks land at Two Wells and private land at Dublin.2. Ordinary Council Meeting Agendas contain reports that are subject to confidentiality orders with dates and titles as follows:<ol style="list-style-type: none">a. 24 July 2023 - Dublin Urban Land Development.b. 23 October 2023 Two Wells West Development Proposal



For more information on Council's submission, please contact David Bailey, Strategic Projects Officer at info@apc.sa.gov.au or (08) 8527 0200.

Yours sincerely

Darren Starr

Darren Starr

Director Growth and Investment

Attached – Submission – Greater Adelaide Regional Plan Discussion Paper.



Submission – Greater Adelaide Regional Plan Discussion Paper



30 October 2023

Contents

APPROACH TO SUBMISSION	2
RESIDENTIAL AND EMPLOYMENT GROWTH PROPOSALS	3
Further Two Wells Growth.....	5
Two Wells/Lewiston Rural Living and Animal Husbandry.....	9
Dublin and Mallala	12
Productive Land	14
OPEN SPACE PROPOSALS	16
ENVIRONMENT PROPOSALS	18
PRIVATE LAND INVESTIGATION	18
APPENDICES	19

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

APPROACH TO SUBMISSION

Adelaide Plains is one of SA's fastest growing councils. Adelaide Plains grew from 8,912 in 2016 to 9,655 in 2021 and is planned to grow to 19,000 by 2041. 80% of growth is at Two Wells. Two Wells grew at 4.8% per annum between 2016 and 2021, a rate of growth comparable to Mt Barker, and well above metropolitan Adelaide.

Adelaide Plains is Kurna country.

Adelaide Plains Council represents a proud community with vibrant townships and remarkable landscapes. Council represents this growing population across 935 square kilometres connected to the Barossa, South Australian coast, and Adelaide.

The Light and Gawler Rivers pass through the region creating rich, fertile plains ideal for supplying primary produce to local, national, and international markets. The expanse of farmland is a common thread that connects each township's unique character. Adelaide Plains is a place where people can choose to live and work locally, with quality services, facilities and open space that supports community wellbeing and resilience.

With a growing population and economy, Council undertakes strategic planning, makes submissions to other entities, seeks funding opportunities, and provides day to day services.

These activities are to support an enviable lifestyle, emerging economy, remarkable landscapes and provide proactive leadership for the community and environment of the Adelaide Plains council area.

RESIDENTIAL AND EMPLOYMENT GROWTH PROPOSALS

The Discussion Paper proposes further areas for longer term growth across Greater Adelaide, be it CBD infill, middle ring suburb regeneration, or green field and township expansion on the fringe, such as at Two Wells and south of Riverlea.

This is intended to work towards four outcomes for Greater Adelaide. The idea of living locally forms part of how the Commission intends to grow Greater Adelaide, including within Adelaide Plains. Living locally is about there being opportunities for living, working, and recreating 'locally'.

Living Locally can contribute to the Commission's four outcomes for Greater Adelaide:	
A greener, wilder and climate resilient environment	<ul style="list-style-type: none">• Protects environmental areas• Reduces reliance on private car travel• Reduces pollution and CO₂ emissions• Focuses on access to high quality open space• Aligns with the state's Climate Change Action Plan.
A more equitable and socially-cohesive place	<ul style="list-style-type: none">• Enhances sense of community• Supports passive surveillance to increase safety• Diverse housing contributes to diverse communities• Equal access to services and amenities across neighbourhoods• Improves health and wellbeing outcomes.
A strong economy built on a smarter, cleaner, regenerative future	<ul style="list-style-type: none">• Supports health and infrastructure savings to the SA economy• Reduces household transport time and cost• Supports local economies, particularly retail trade• Supports mixed-use opportunities, bringing jobs to where people live.
A greater choice of housing in the right places	<ul style="list-style-type: none">• Supports the core component of 'Affordable Living' concepts• Promotes housing diversity and affordability in different contexts• Focuses on better design of infill housing, including improved greening• Enhances sense of wellbeing linked to shorter commute times.

Figure 1 Four Outcomes are intended for Greater Adelaide, with living locally supporting all four

Background

Delivering growth that is liveable and sustainable through expanding townships such as Two Wells needs coordinated planning and infrastructure provision by all the relevant physical and social infrastructure providers (including Council in its infrastructure role).

Officer level discussions with northern region councils indicate an openness to further growth but a consistent message about need for infrastructure noting most infrastructure is not local government funded.

Within this submission, our 'Comments to Commission' have been informed by the following contained in the **Appendices**:

- Council's 2023 Growth Strategy and Action Plan¹ and Background Paper. This is guiding current planned growth
- 2023 Submission to Expert Panel
- 2022 Submission to the Environment and Food Production Area Review.

Comment to Commission

As an organisation, Council is fully committed in its annual and long term planning and financial capacity to address its role as one of the fastest growing Council's in South Australia.

Council is open to the concept of further urban growth flagged in the Discussion Paper and acknowledges any further growth will need Council to provide sufficient operational resources to undertake its role in planning for this further growth.

Council's openness is however conditional on further 'whole of Government' work to align and integrate State level infrastructure and funding to ensure the foreshadowed growth is serviced, liveable and sustainable.

The term 'whole of Government' is used recognising the Commission needs to work with other State level entities responsible for planning and delivering infrastructure and services such as health, schools, emergency services, transport, water, sewer and hazard infrastructure.

A 'whole of government' approach is needed to ensure the Commission's four outcomes for Greater Adelaide are met.

To assist with this, we suggest a northern region planning team, possibly as an augmentation to the growth areas infrastructure team within Planning and Land Use Services (PLUS). A northern region planning team should work with Adelaide Plains, Playford, Gawler, Light Regional and Barossa Councils as well as Infrastructure SA on a coordinated approach to planning, infrastructure and funding in the north of Adelaide.

¹ apc.sa.gov.au/council-services/development/strategicprojects

Further Two Wells Growth

The Discussion Paper proposes further growth for employment and living at Two Wells.

Figure 9 – Proposed areas of investigation
Greenfield and satellite city growth



Figure 15 – Proposed areas of investigation
Employment growth

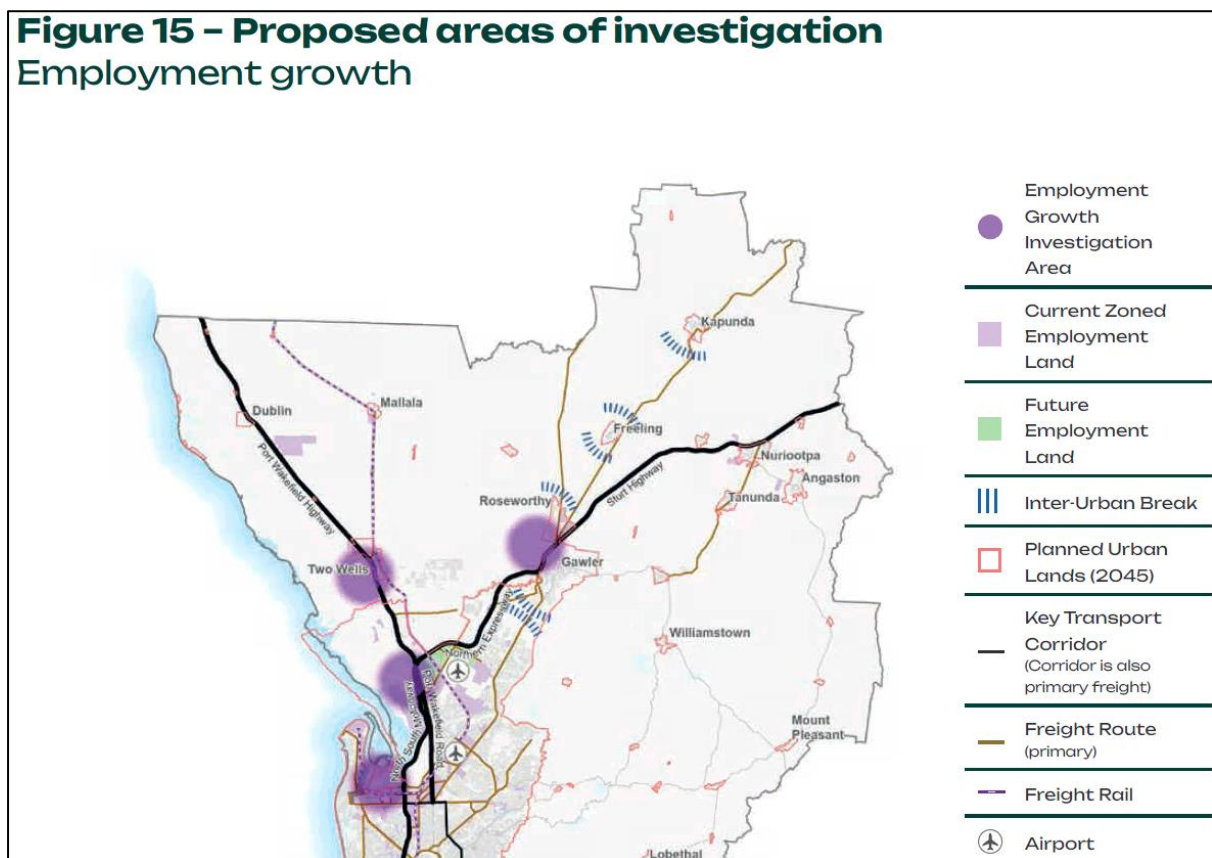


Figure 2 Proposed Areas of Investigation in the Discussion Paper

Why this area

This area was identified as an investigation area for future residential/employment activities because:

- It makes use of the significant investment in road infrastructure already completed
- Further development would build on and leverage the current development activity that is already planned for Riverlea and Two Wells, which is anticipated to provide more than 15,000 new dwellings over the short to medium term
- Planned infrastructure investment to support these already identified development fronts could be leveraged as a base for further growth (regional infrastructure solutions)
- The topography of the land does not present significant challenges
- The current land uses could be moved to other locations without significantly impacting the state's economy
- The land has lower primary production value than other high-quality land in the north
- It is well connected to strategic employment lands in northern Adelaide, such as Edinburgh Parks
- Additional development in this investigation area may provide the population numbers needed to justify significant regional infrastructure investment.

Challenges

Some of the challenges associated with potential future residential/employment activities include:

- Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed
- Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance
- The area is currently not supported by high frequency public transport and would require significant investment in trunk infrastructure to support urban growth
- It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency
- Hazards and environmental issue such as flooding would need to be considered and managed.

Figure 3 Explanation about the Investigation Areas in the Discussion Paper

Background

Recognising Adelaide Plains is one of SA's fastest growing councils, in 2023, Council adopted a Growth Strategy and Action Plan (GSAP).

The purpose of the GSAP is to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. The GSAP has a long-term view to 2040 with targeted actions focused over the next 5 – 10 years.

The Growth Strategy envisages recognises the potential for growth on the Hicks land to the north west of Two Wells.

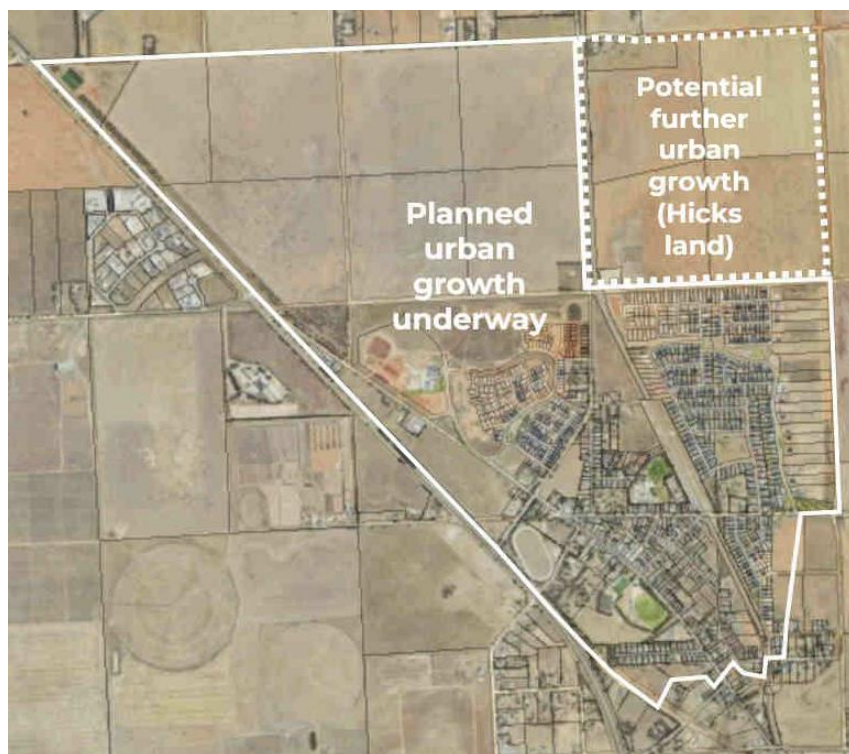


Figure 4 The Hicks land at Two Wells is north of the Eden housing estate, and east of the railway line

The GARP Discussion Paper suggests planned infrastructure to support existing growth regionally could be leveraged to support 'further growth', that existing land uses could be relocated without significantly impacting the SA economy, and that the further growth 'may' provide the population to justify significant regional infrastructure investment.

Historically, there has been lack of State Government funding of services within Adelaide Plains and Two Wells other than roads, e.g., no public health services, no public transport (bus or rail), and limited education facilities aside from Riverbanks College. There is limited community transport across Adelaide Plains.

While Council is planning for current growth as part of its Growth Strategy e.g. zoned land, support from State Government is required to accommodate existing planned growth as well as further urban growth.

Comment to Commission

If residential and employment growth is proposed at Two Wells as per the Discussion Paper, then demand for services (physical and social) and infrastructure upgrades will increase exponentially and Council and development sector will not be able to fully fund.

The draft Strategy needs to include detailed and timed 'whole of Government' infrastructure proposals.

To inform these proposals, the Commission is requested to undertake research which shows the proposed Two Wells housing/employment mix in the context of the foodbowl will lead to realisation of the ability for most residents to live, work and recreate locally, and to lessen the time, financial, environmental and social costs associated with high proportion of lengthy commute time. This benefits agribusiness growth who need workers.

Housing diversity is highlighted however there is currently no incentive for diversity and recent legislative changes make it easier to create homogeneous townships. The draft GARP should include specific strategies about providing diverse housing mix – including aged, community and social housing - in new growth areas.

Investigations need to look at public and community transport, in particular east west. The Regional Public Health Plan² for Adelaide Plains, Light Regional, Barossa and Gawler seeks improved public transport, the establishment of a regional community passenger network, and targeted improvements in walking and cycling networks.

² barossa.sa.gov.au/council/management-plans/public-health-and-wellbeing-plan

Two Wells/Lewiston Rural Living and Animal Husbandry

The Discussion Paper recognises the Rural Living area exists stating ‘Except for areas currently identified for urban development, most of this (north western area) is currently zoned for rural and horticultural activities, including rural living or lifestyle allotments.’

Background

Council’s submission to the 2021 EFPA review (see **Appendice**):

- Questioned the rationale for the EFPA applying to Rural Living Zoned land.
- Flagged being open to the EFPA continuing in place over Two Wells / Lewiston Rural Living Zone and Animal Husbandry Subzone until, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:
 - The barrier of the Environment and Food Production Area limiting subdivision for low intensity residential living where associated with horse or dog keeping being corrected.
 - The lack of the Environment and Food Production Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.
- Sought that the Greater Adelaide Regional Plan should better reflect the Animal Husbandry Zone as a business cluster and the envisaged development of horticulture in the southern third of Adelaide Plains.

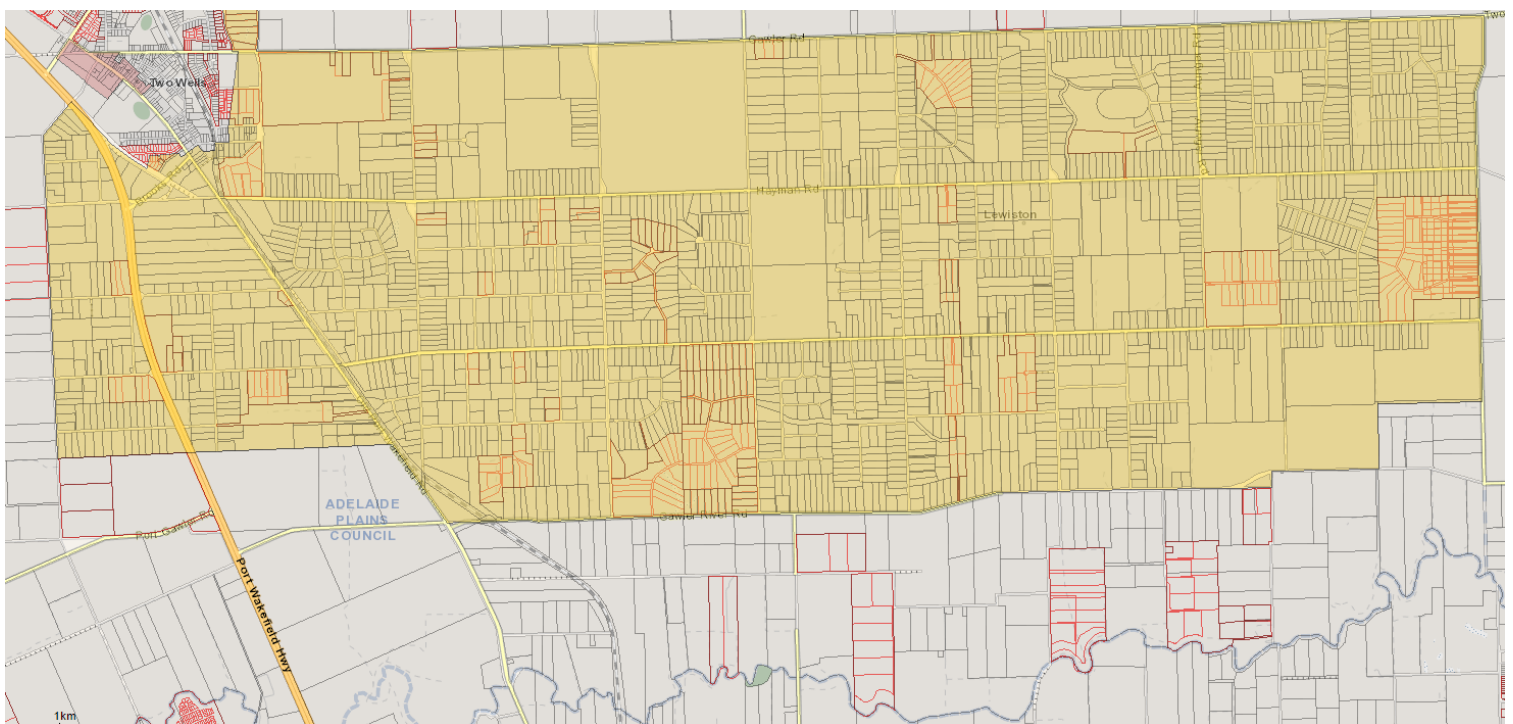


Figure 5 The large undivided lots are unable to be subdivided for rural living due to the EFPA. Map (SAPPA September 2023) shows new rural living lots progressively being bought to the market due to land divisions being lodged prior to the EFPA coming into effect.

New rural living lots are progressively being bought to the market due to land divisions being lodged prior to the EFPA coming into effect. However, some 20 large lots in Lewiston are unable to be subdivided for rural living due to the EFPA, and there is no clear strategy for the release of that land.



Figure 6 SA's Premier Rural Living Animal Husbandry Zone

Investigations and engagement over 2022 lead to Council's adopted Equine Strategy³ envisaging horse activity growth in the Animal Husbandry area.

Comment to Commission

Council requests the draft GARP include a specific strategy envisaging the Animal Husbandry Area continuing to operate as it has for many years and reflecting long term planning policy.

Noting the intent of the draft GARP to inform future EFPA reviews, Council requests the draft GARP include timing about the progressive lifting of the EFPA of land zoned for rural living throughout Lewiston. Land supply investigations for the draft GARP should analyse need for progressive release of land and over what timeframe for rural living within the northern region of which Lewiston is part, noting the role of GARP to plan ahead for land supply over decades.

³ Available via apc.sa.gov.au/council-services/development/strategicprojects

Dublin and Mallala

The Paper states ‘The Investigation areas do not extend as far as the towns of Dublin and Mallala. These towns will keep their own separate identity but may expand locally to support township function and viability’.

Background

Mallala has zoned land, with the Gracewood land division envisaging some 500 lots. This land division has been granted planning consent. Other land is available long term.

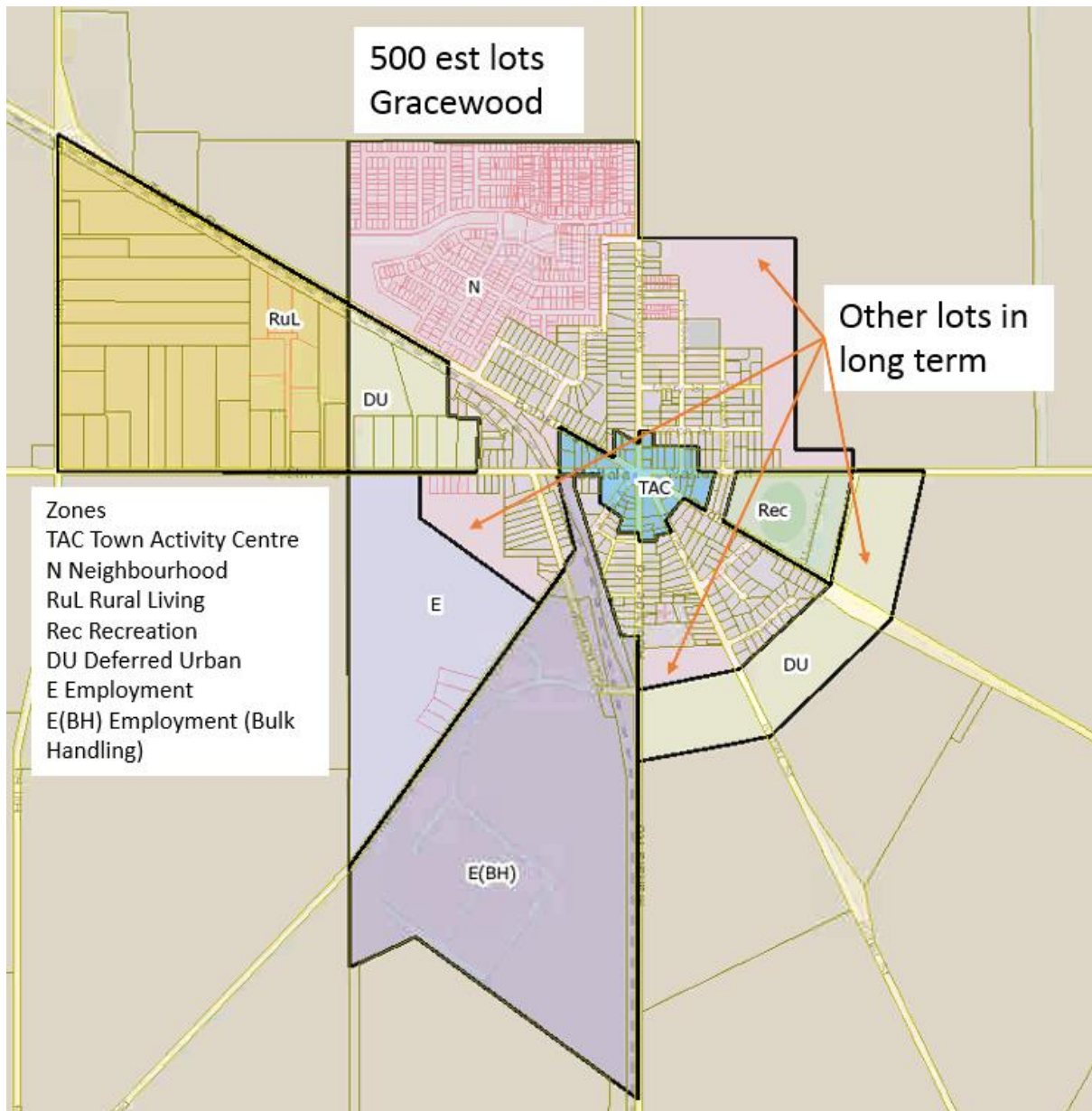


Figure 7 Zoned land for growth at Mallala

At Dublin, Council's Growth Strategy envisages potential further growth at Dublin

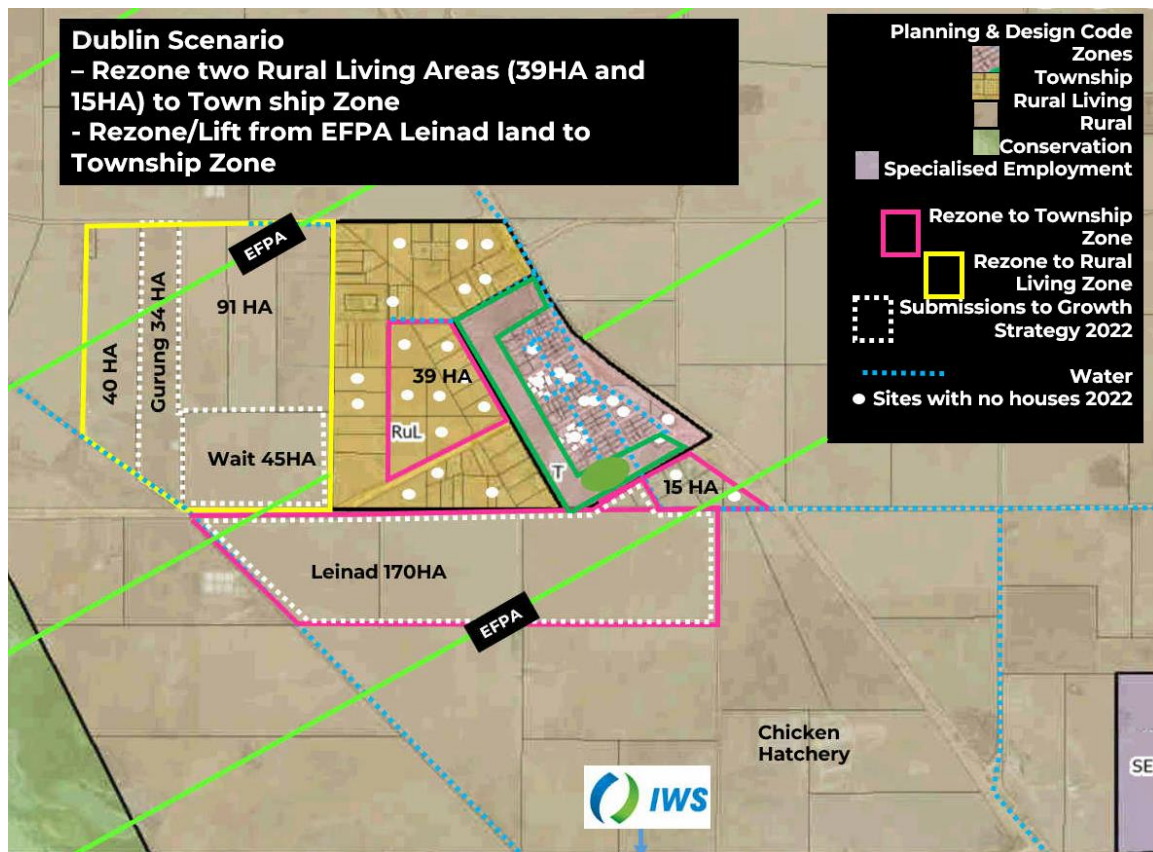


Figure 8 The 2022 scenario proposed in submissions to Council's Growth Strategy involve expansion of the township zone to the west and south, and further Rural Living to the west

Council's Business Plan for 2023/24 contains a project to undertake the Dublin Township Growth and Tourism Master Plan. Staff have commenced preparing a Background Paper and informal discussions with local stakeholders and development interests.

For Dublin, further investigations are needed around:

- opportunities to grow tourism and business experiences
- need for land supply release for housing, including rural living as transition to agriculture. Assessment of value of soil for food production and environmentally needs consideration
- potential for conflict with established uses, such as the chicken hatchery and waste facility to the south
- community infrastructure and open space
- hard infrastructure, e.g. sewer and water.

Comment to Commission

Planned growth is progressing at Mallala.

The draft GARP should provide spatial and timing clarity for growth at Dublin. Growing Dublin's services role is important for increasing agribusiness and visitation to the Adelaide

International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP). AIBSNP-WP is recognised as an important part of the Greater Adelaide Open Space System.

Productive Land

The Discussion Paper states ‘Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance.’

The Discussion Paper acknowledges food and water security as a key trend influencing Greater Adelaide’s future.



Figure 9 The vast majority of land in Adelaide Plains is impacted by the EFPA

The EFPA covers the majority of land within Adelaide Plains and does not allow the division of land solely for housing.

Council’s submission to the 2021 EFPA review (**Appendix**) affirmed the EFPA generally aligned with Council’s strategic goals and noted various matters required review.

The GARP Discussion Paper was discussed at various meetings involving RDA Barossa and the Northern Adelaide Plains Food Cluster. A meeting of officers of peri-urban councils identified the following areas of shared interest:

- The Greater Adelaide Regional Plan needs to bring back a focus on the peri-urban region as a sub-region in its own right with overarching objectives and outcomes.
- Need to have Primary Production Priority Areas (PPPA) areas identified before looking at any changes to EFPA boundaries.
- The Planning & Design Code has increased the ability for value adding and diversification which is seen as positive. However, absence of fine-grained policy in former Development Plans not in the Planning and Design Code presents certain risks associated with ongoing land use intensification and diversification. Existing Rural Living Zones also need better understanding in terms of the trends and data influencing them. These matters need proper investigation and data collation and analysis to inform possible changes to the Planning and Design Code.
- Identifying and promoting scenic routes, scenic lookouts and the like which contribute to the landscape value needs to be prioritised and introduced to the Planning and Design Code.

Comment to Commission

Council affirms the importance of food and water security.

Council requests the Commission consider the following:

- The integrated approach to food and water associated with the Northern Foodbowl Protection Areas Development Plan Amendment of 2018 and the significant investment in the Northern Adelaide Infrastructure Scheme need further time to realise the intended benefits. The draft GARP should contain specific strategies including spatially applied to provide ongoing certainty for long term private and public investment.
- Enabling productive land for food presents local job opportunities. This is important for residents moving to planned growth to be able to work locally, with the social, less travel, and less emissions benefits.
- Unrealised opportunities of food production areas involve tourism and education

Council requests the Commission work with PIRSA, experts and the Northern Adelaide Plains Food Cluster, to provide guidance on the nature of food production investigations needed to inform lifting the EFPA. This guidance could be within the draft GARP

Northern Adelaide Irrigation Scheme (NAIS)

The Northern Adelaide Irrigation Scheme (NAIS) was intended to provide recycled water to be used to irrigate crops, particularly horticulture. The project jointly funded by the South Australian and Australian Governments involved the development of new water treatment facilities built within the Bolivar precinct to increase its production of recycled irrigation water.

The Scheme, which is delivered by SA Water, was intended to unlock 12GL of quality water to be used in agricultural food production to support the development of over 300 hectares of high-technology horticulture, and a further 2,700 hectares of advanced agri-food production. Council undertook a Development Plan Amendment which was aimed at facilitating significant recycled water from the Bolivar wastewater treatment plant, and harvesting this water for intensive high-tech irrigated horticulture.

To date there has been low rates of take up of NAIS water, with the horticulture industry citing high capital contribution/connection costs, infrastructure augmentation requirements, access to NAIS infrastructure and the high cost and quality of water as barrier to using the scheme. This results in water reuse through the scheme being low and economic development, particularly horticulture, not being stimulated. The development of the NAIS project to its full potential would lead to significant employment and economic activity within the Northern Adelaide Plains and South Australia.

OPEN SPACE PROPOSALS

The Discussion Paper outlines the Commission will build on the Metropolitan Open Space Framework in the Greater Adelaide Regional Plan to create quality open spaces across the region.

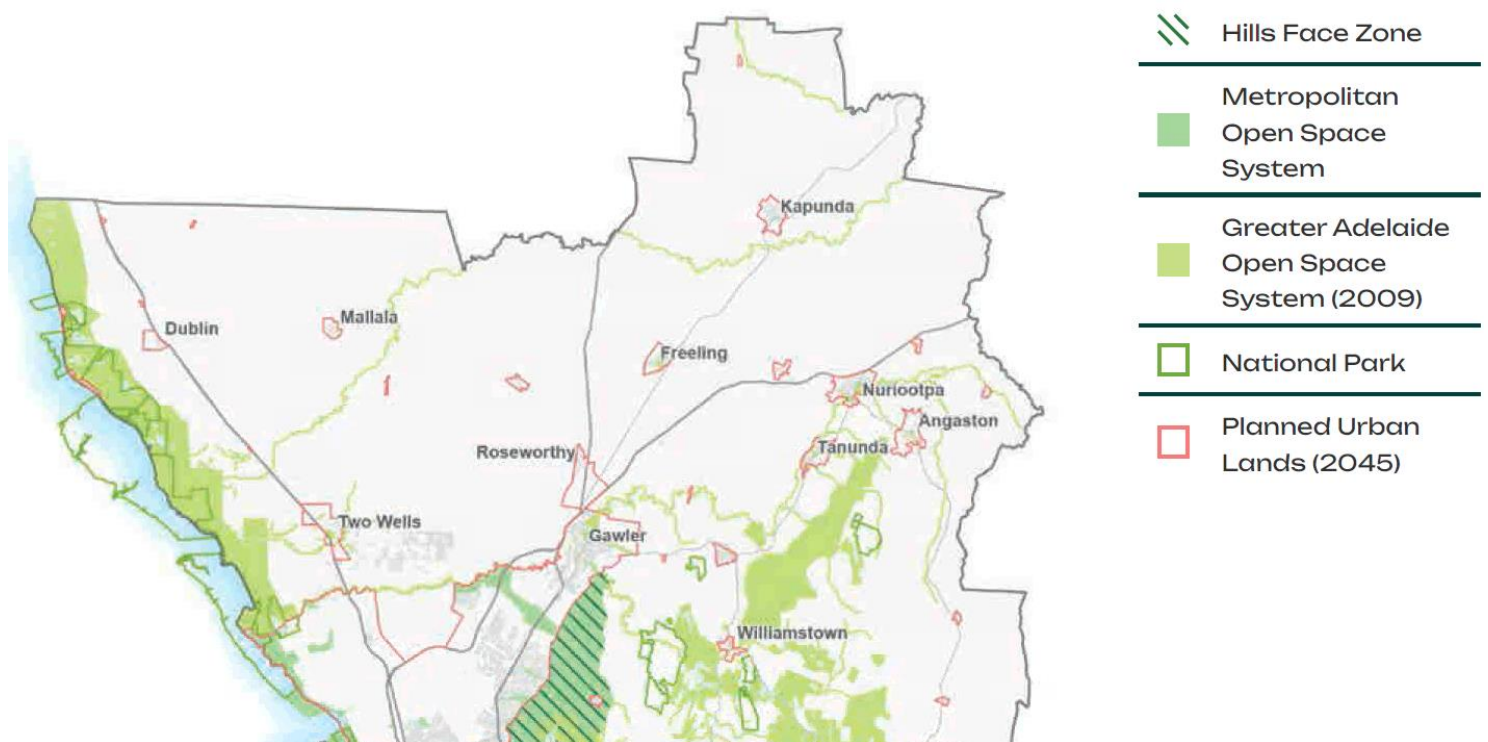


Figure 10 2010 and Current MOSS areas as shown in the Discussion Paper

Background

The Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP) as a key part of the Greater Adelaide Open Space System, as are the Light and Gawler Rivers, and a range of local parks.

Council is working closely with National Parks and Wildlife Service about the future of coastal settlements enveloped by AIBSNP-WP including discussing options to inform possible plans for the settlements.

Much of Adelaide Plains is subject to potential for flooding and Council is part of the Gawler River Flood Management Authority. The Gawler River is formed by the confluence of the North Para and South Para in the town of Gawler and is located in the Adelaide Plains district of South Australia. The district surrounding the river produces cereal crops and sheep for both meat and wool, as well as market gardens, horticulture, almond orchards and vineyards. The farm gate output of the Gawler River floodplain horticultural areas is estimated to be at least \$355 million.

The river is subject to periodic flood events. The catchment is identified in the state's flood hazard plan as a significant flood risk. The River has been flooded on average every 10 years over the past 160 years (known records). Most recently, large floods have occurred in 1992 (September, October, December), November 2005 and October 2016.)

The Gawler River Flood Management Authority was established for the purposes of coordinating the planning, construction, operation and maintenance of flood mitigation infrastructure for the Gawler River. The regular flooding along the Gawler River impacts affected communities through displacement, economic loss and infrastructure repair/replacement. Costs of undertaking flood mitigation infrastructure works are significant and any further urban growth in Adelaide Plains should consider likely flood mitigation requirements, costs associated with those measures and funding sources.

Flood protection ranked as the most important issue in Council's 2018 and 2022 community surveys. In preparing Council's 2021 – 2024 Strategic Plan, consultation with relevant authorities identified the capacity issues of the Adelaide Plains section of the Gawler River and the ongoing likelihood of flooding could impact economic and urban development. The hazard to residents and businesses presented by risk of Gawler River floods continues to be a challenge. Hazard and funding options continue to be investigated by the Gawler River Flood Management Authority, with Department of Environment and Water briefing Council at its meeting on 25 September 2023 about the Gawler River Flood Management Business Case.

The Gawler River Open Space Strategy was prepared in 2009 for the Gawler River Floodplain management Authority.

Council is intending to prepare an updated Open Space Strategy in 2023/2024.

Comment

Council supports an updated metropolitan open space strategy.

This includes recognising the regional role of the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara (AIBSNP-WP) as a key part of the Greater Adelaide Open Space System.

With both current planned growth and the future growth flagged in the Discussion Paper, the draft GARP should include a specific strategy about the Gawler River seeking recreation and hazard management outcomes.

Council requests the Commission be aware of the following:

- Managing flood hazard is a key outcome for agribusiness and residential interests in the flood plain
- Much of the Gawler River proper is in private ownership
- Hazard and funding options investigations by the Gawler River Flood Management Authority and State Government are ongoing
- A Gawler River Open Space Strategy was completed in 2009.

ENVIRONMENT PROPOSALS

The Discussion Paper documents the impacts of climate change and the need for an updated open space strategy and greening are identified. The Discussion Paper outlines a range of ideas to respond to climate change and to foster resilience. Many of these are policies or programs underway and intended to continue.

Comment

The draft GARP should include actions to ensure climate ready and energy efficient building design.

The Commission's 'Planning for Climate Change' Brochure⁴ outlines various proposals for including for change of the Planning and Design Code that need proper investigation.

The current statutory arrangements and Planning and Design Code within Adelaide Plains are lacking with respect to inadequately planning ahead to address the risk of heat from urban growth. The current experience is extensive use of black roofs and limited landscaping/trees, resulting in facilitation of growth less climate ready.

PRIVATE LAND INVESTIGATION

Council provides the following information about private land investigations.

1. Council's adopted Growth Strategy has a strategy to 'Plan for future urban growth including at Dublin and Two Wells'. Related actions are:
 - a. **'Dublin** – scope future urban growth to the south and west, noting 2019 Council decision to support further investigating Leinad land south of existing township. Consider near coastal tourism role, agriculture, proximity to established industries and Carslake Industrial Area, community and open space facilities, recreation and sport, water reuse and necessary infrastructure.'

⁴ plan.sa.gov.au/_data/assets/pdf_file/0005/1252895/Planning-for-climate-change.pdf

- b. **‘Two Wells Hicks land** – scope future urban growth, noting 2019 Council decision for in principle support for further investigations. Consider housing mix, recreation and sport, water reuse, the train line and Mallala Road, and orderly connections with Two Wells. The potential urban development of the Hicks land immediately to the east of Liberty and separated by Mallala Road and the ARTC train line will need to involve the Hickinbotham Group, DIT and ARTC as key stakeholders amongst others. Continue with Growth Strategy action seeking the urban development of the Hick’s land, noting this involves seeking lifting of the Environment and Food Production Area, rezoning, and suitable infrastructure agreements.’
2. Ordinary Council Meeting Agendas contain reports that are subject to confidentiality orders with dates and titles as follows:
 - a. 24 July 2023 - Dublin Urban Land Development.
 - b. 23 October 2023 – Two Wells West Land Development Proposal

APPENDICES

- Growth Strategy and Action Plan and Background Paper 2023
- Expert Panel Planning Review Submission 2023 (this includes Council’s Environment and Food Production Area Submission 2021 and Council’s Submission on introduction of Planning and Design Code)



GROWTH STRATEGY

May 2023



Contents

PURPOSE	3
ROLE OF COUNCIL	3
VISION	3
SETTING THE SCENE.....	5
POPULATION FORECASTS BASED ON PLANNED URBAN GROWTH .	5
POPULATION FORECASTS BASED ON POTENTIAL URBAN GROWTH	8
MAIN LOCATIONS OF POPULATION GROWTH	10
RELATIONSHIP WITH OTHER STRATEGIES.....	11
Strategic Plan	11
Long Term Financial Plan	11
GROWTH PLAN ON A PAGE	12
THREE TOWN SERVICE MODEL.....	13
TWO WELLS	14
Strategy	14
What is Needed and When	15
One Scenario for Two Wells	16
STRATEGIES AND ACTIONS	17
Enviably Lifestyle	18
Emerging Economy	24
Remarkable Landscapes.....	27

Proactive Leadership	30
----------------------------	----

Cover Photos - Updating community infrastructure – like at Two Wells with Village Green adjacent the Library and Xavier School – are critical to support liveable population growth. Agribusiness growth and coastal experience growth are important priorities.

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

Version	Comment
May 2023	Adopted 24 April 2023
April 2023	Refined following consultation
July 2022	Consultation
June 2022	For Council June 2022

PURPOSE

The purpose of the Growth Strategy and Action Plan (GSAP) is to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. The GSAP has a long-term view to 2040 with targeted actions focussed over the next 5 – 10 years.

Liveable growth involves some actions for APC to lead. Some actions however are for others to deliver, including State Government, and development and community partners. APC will collaborate with others – including nearby councils and regional authorities as appropriate on all the strategies and actions.

Liveable growth occurs by collaborative relationships and smart investment in the necessary social and economic infrastructure.

This GSAP draws on the Adelaide Plains Growth Background Paper.

ROLE OF COUNCIL

Council has roles in planning for growth, advocating about the impacts of growth, and delivering infrastructure and services – sometimes via facilitating – that support growth.

This GSAP describes Council’s roles as:

- Plan
- Advocate

- Deliver/facilitate.

VISION

Council’s Strategic Plan 2020 – 2024¹ identifies the vision for the Council area. Council’s Strategic Plan also contains ‘Strategic Responses’.

These strategies include enviable lifestyle, emerging economy, remarkable landscapes and proactive leadership.

This GSAP supports achievement of the aspired Vision by identifying Strategies and Actions based on and structured around the Strategic Plan 2021 – 2024 outcome areas of:

- Envable Lifestyle
- Emerging Economy
- Remarkable Landscapes
- Proactive Leadership

¹ apc.sa.gov.au/_data/assets/pdf_file/0023/355181/Adelaide-Plains-Council-Strategic-Plan-2021-2024

Vision

Adelaide Plains is:

Productive: A leading supplier of primary produce to local, national and international markets.

Proximity to markets and natural growing conditions provide competitive advantages for primary producers on the Adelaide Plains that has seen our economy emerge as a key contributor to the region's prosperity.

Diverse: A more diverse community with access to a greater mix of local opportunities.

Increased employment, services and education attracts and retains a diverse community that chooses to live, learn and work in the region.

Location: A lifestyle location connected to the Barossa, Coast and Adelaide.

Adelaide Plains is a quiet community that offers residents time and space with convenient access to the benefits of Greater Adelaide, the coast and the Barossa region.

Welcoming: A proud, spirited and generous community.

This is a place that everyone belongs, where community connection and care is strong and someone is always available to help when a neighbour is in need.

Ambition: Advancing infrastructure and technology to foster a competitive local economy.

Modern practice, research and innovation, and efficient access to export centres and local markets builds an economic environment and reputation that rivals the State's major primary productions regions. With employment opportunities diversifying and new housing products in abundance, Adelaide Plains will become the place of choice for the Northern Adelaide Plains.

Leadership: A decisive and proactive Council.

Our Elected Members share a vision of prosperity founded on courage, robust deliberation, transparency and forward thinking and investing.

Attractive: A Place of choice for businesses, residents and visitors.

Our townships are inviting, well cared for, filled with character and provide a range of services, facilities and accommodation that caters for all people and our landscapes, events and infrastructure provide memorable experiences.

Tourism and Economic Development Strategy

Five Themes

- Town Centres and Main Streets
- Business Support and Growth
- Food and Primary Industries
- Coastal Experiences
- Marketing and Branding

SETTING THE SCENE

Planning for growth is important as the population of Adelaide Plain's is forecast to double over the next 20 years.

The majority of population growth is at Two Wells. Demand at Two Wells is being driven by available and serviced land, government stimulus, the northern connector, and opening of new facilities such as Xavier College.

Growth is also flagged but yet to commence at Mallala.

Council has supported further possible growth at Two Wells and Dublin, with these requiring investigations, rezoning, lifting of the Environment and Food Production Area, infrastructure planning and provision.

Growth in Adelaide Plains is part of the outer north being planned for the greatest amount of fringe growth in Greater Adelaide.

The Growth Background Paper contains detailed investigations.

²

plan.sa.gov.au/news/article/2019/new_population_projections_released_for_south_australia

POPULATION FORECASTS BASED ON PLANNED URBAN GROWTH

SA Government provide forecasts² about growth based on low, medium and high scenarios.

Adapting these forecasts, the following low, medium and high scenarios are forecast for Adelaide Plains.

The LOW projection includes MEDIUM growth but at a lower rate or over an extended period of time. The LOW projection aligns with a forecast of 19,358 in 2050³.

The MEDIUM projection includes growth that is known.

- Known includes land already zoned for urban development.
- At Two Wells, this assumes Liberty and Eden are both completed over the next 20 years. Eden with around 265 lots and Liberty with around 2000 lots. This also assumes a town CWMS is installed and land within the proposed levee is rezoned, both leading to the ability for increased housing options within the original township.
- At Mallala, Gracewood with around 500 lots is developed and a small number of dwellings constructed in the balance of Mallala. 1042 residents in Mallala and nearby rural areas in 2021⁴ grows by 1300 to around 2300 in 2040.

³ Population forecast by Holmes Dyer as included in the APC Strategic Plan 2021 – 2024.

⁴ quickstats.censusdata.abs.gov.au

- At Lewiston, some 600 residents move into existing lots or lots with approvals pending release over the next 20 years. This number recognises the impact of flood risk entails the more readily developable land has already been developed, and the impact of the EFPA on precluding the ability for further residential only development.
- Through the balance of the Council area including Dublin and 100 further residents at Thompson Beach, small increases in population.

The HIGH projection includes MEDIUM growth but at a faster rate or over a shortened period of time.

The MEDIUM projection identifies that the Council area grows from 9977 in 2021 to 18,500 residents by 2041. 7,500 of this growth is at Two Wells.

On projections generally, the level of certainty decreases the further into time a forecast looks forward.

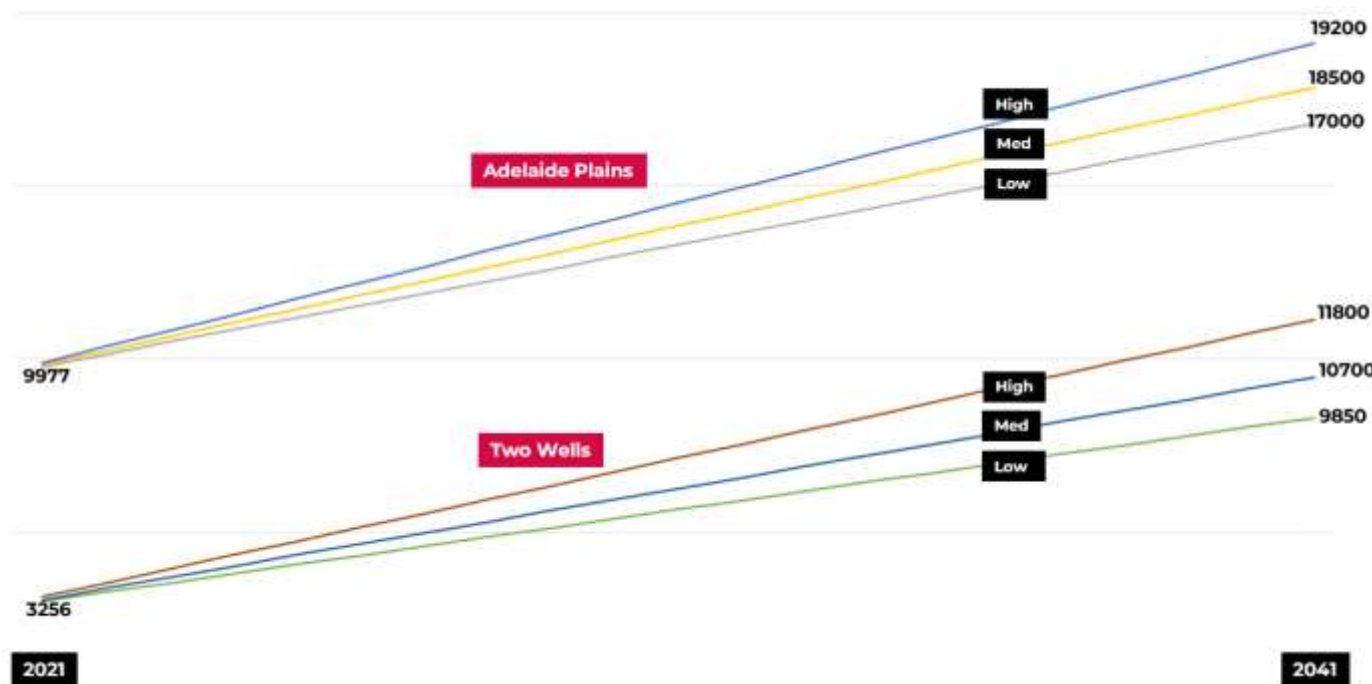
The final block was settled at Eden in early 2023 and Liberty will continue to see more dwellings constructed. There is less certainty

when Gracewood will commence works, and likewise when lodged divisions in Lewiston are brought to market.

Certainty is impacted by global and national economic conditions, other land in nearby locations, such as in Playford and Light Regional Council's being brought to the market.

This uncertainty underscores the basis to update the strategies and actions regularly to take account of change.

This growth strategy and action plan is based on the MEDIUM forecast, adopting a proactive approach to planning for a higher rate of growth than the LOW forecast.



APC and Two Wells Population Forecast Estimates Summary						
	2020 ⁵	2021 ABS	2041 est	Increase est	Dwellings/ Annum est	Residents/ Annum est
Adelaide Plains HIGH	9441	9977	19,177 19,100	9,736 9,700	175	460
Adelaide Plains MEDIUM	9441	9977	18,477 17,800	9,036 8,400	150	400
Adelaide Plains LOW	9441	9977	16,977 16,800	7,536 7,400	132	350
Two Wells ⁶ HIGH	2743	3256	11,756 11,700	9,013 8,900	160	425
Two Wells MEDIUM	2743	3256	10,856 10,700	8,113 8,000	140	380
Two Wells LOW	2743	3256	9,856 9,700	7,113 7,000	125	330

This strategy involves actions focussed on fostering a liveable and sustainable Two Wells, recognising just over 80% of population growth is forecast there.

⁵ profile.id.com.au/adelaide-plains/population-estimate accessed October 2022

POPULATION FORECASTS BASED ON POTENTIAL URBAN GROWTH

In 2019, Council decided to support investigations for potential further urban growth on the Hicks land at Two Wells and to the south of Dublin on the Leinad land. Submissions in the 2022 consultation affirmed interest in potential urban growth at the Hicks land and to the south and west of Dublin.

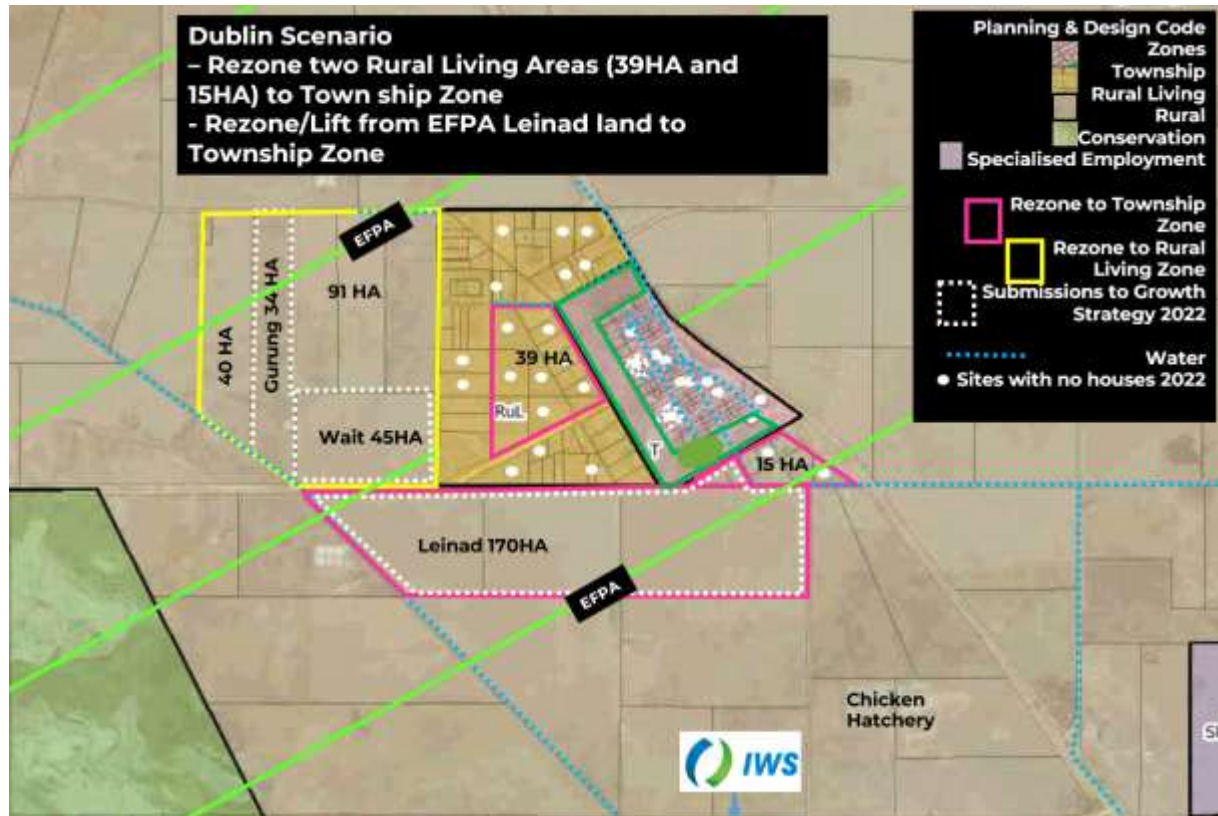
A decision to release Hicks land and land at Dublin as potential urban growth are significant unknowns. Both are within the Environment and Food Production Area (EFPA). The decision to allow the land to be developed for urban growth is ultimately a matter for SA Parliament on the advice of the Planning Minister, the State Planning Commission, and with input from Council. The State Planning Commission five yearly review of the EFPA is next due in 2026.

The Hicks land has potential for around 2,500 residents/940 dwellings in total. If Hicks land was fully developed by 2040, this would lead to a Two Wells of around 13,400.

Land at Dublin has potential for around 4000 residents/1500 dwellings in total. Added to Dublin's 405 residents of 2021, Dublin could be in the order of 4,500. Accounting for the variability of land owners intentions, if around 25% of sites are developed (rather than all sites), this entails Dublin could grow by 1000 to around 1400. If undertaken over 20 years to 2041, this rate of growth is 6% per annum, 1% higher than experienced at Two Wells from 2016 – 2021. If a 3% per annum rate of growth is experienced over 20 years to 2041, this is an increase of 345, leading to a total population of 750.



The Hicks land at Two Wells is north of the Eden housing estate, and east of the railway line



The Dublin scenario proposed in submissions in 2022 by Leinad, Gurung and Wait involve expansion of the township zone to the west and south, and further Rural Living to the west

7


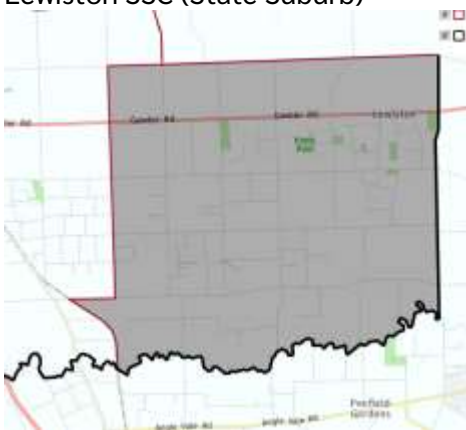
plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_areas

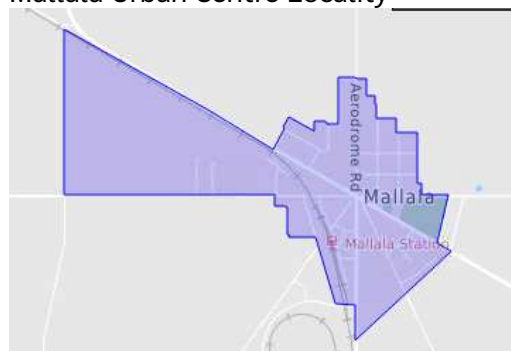


Under a MEDIUM scenario, Adelaide Plains grows from 9441 in 2020 to 18,500 in 2040. If both Hicks and Dublin land was released and fully developed within that timeframe, this would lead to Adelaide Plains in 2040 being around 25,000. This would be a 2.5 times population increase.

Noting available land within Adelaide Plains and the State Planning Commission's 2021 assessment⁷ of no need to open up further land within Greater Adelaide (which includes Adelaide Plains), neither are likely to be available prior to 2026.

Recognising Council decisions to support investigations for this potential growth, this strategy plans for this potential growth in the longer term order to create liveable communities whilst not unduly impacting existing zoned supply.

MAIN LOCATIONS OF POPULATION GROWTH

Main Locations of Population Growth		
	Current	2041 est
<p>Two Wells SA2 (Statistical Area Level 2)</p> 	<p>3256 (2021) 2743 (2020)</p>	<p>10,900 (IF Hicks land fully developed, Two Wells becomes 13,400)</p>
<p>Lewiston SSC (State Suburb)</p> 	<p>3310 (2021) 3076 (2016)</p>	<p>4050 3500</p>

<p>Mallala Urban Centre Locality</p> 	<p>1042 (2021) 894 (2016)</p>	<p>2300 1700 (assumes Gracewood developed)</p>
<p>Dublin SSC</p> 	<p>405 (2021)</p>	<p>500 (IF unplanned growth land is fully developed long term, Dublin and nearby rural areas becomes 4500)</p>
<p>Thompson Beach</p> 	<p>219 (2021)</p>	<p>300</p>

RELATIONSHIP WITH OTHER STRATEGIES

Strategic Plan

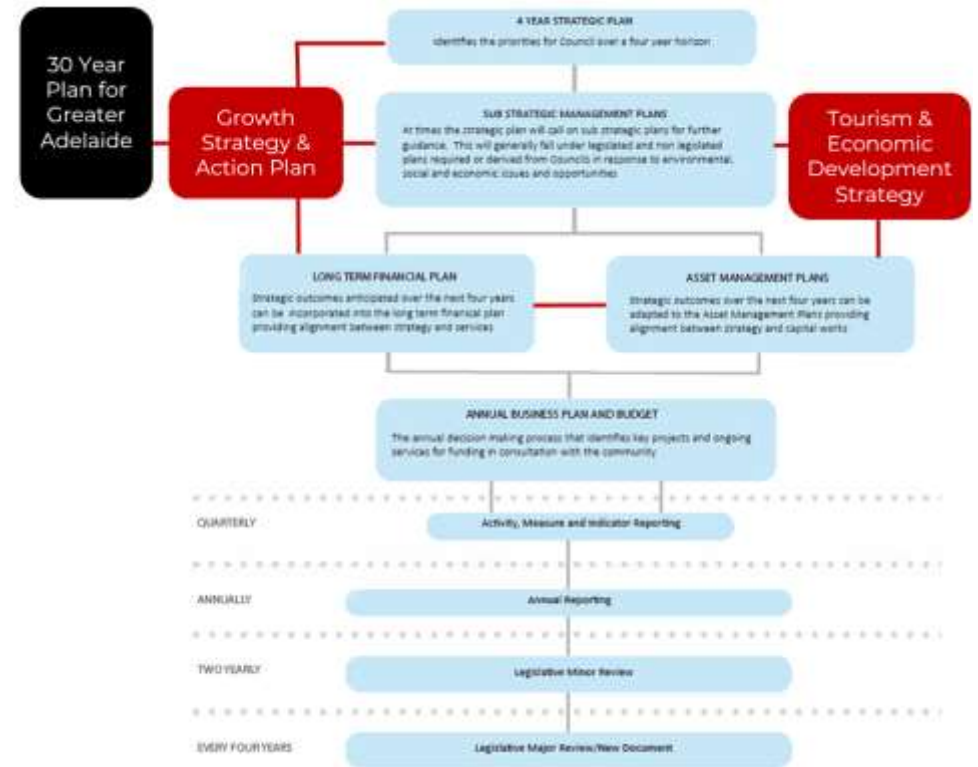
The GSAP:

- Summarises analysis undertaken by Council covering economic, social, health and recreational planning, landscape and environmental planning, land use planning, infrastructure capacity, governance, and review of the 30 Year Plan for Greater Adelaide (refer Growth Background Paper)
- Identifies Strategies and Actions based on the Strategic Plan 2021 – 2024 outcome areas of:
 - Enviable Lifestyle
 - Emerging Economy
 - Remarkable Economy
 - Proactive Leadership

Long Term Financial Plan

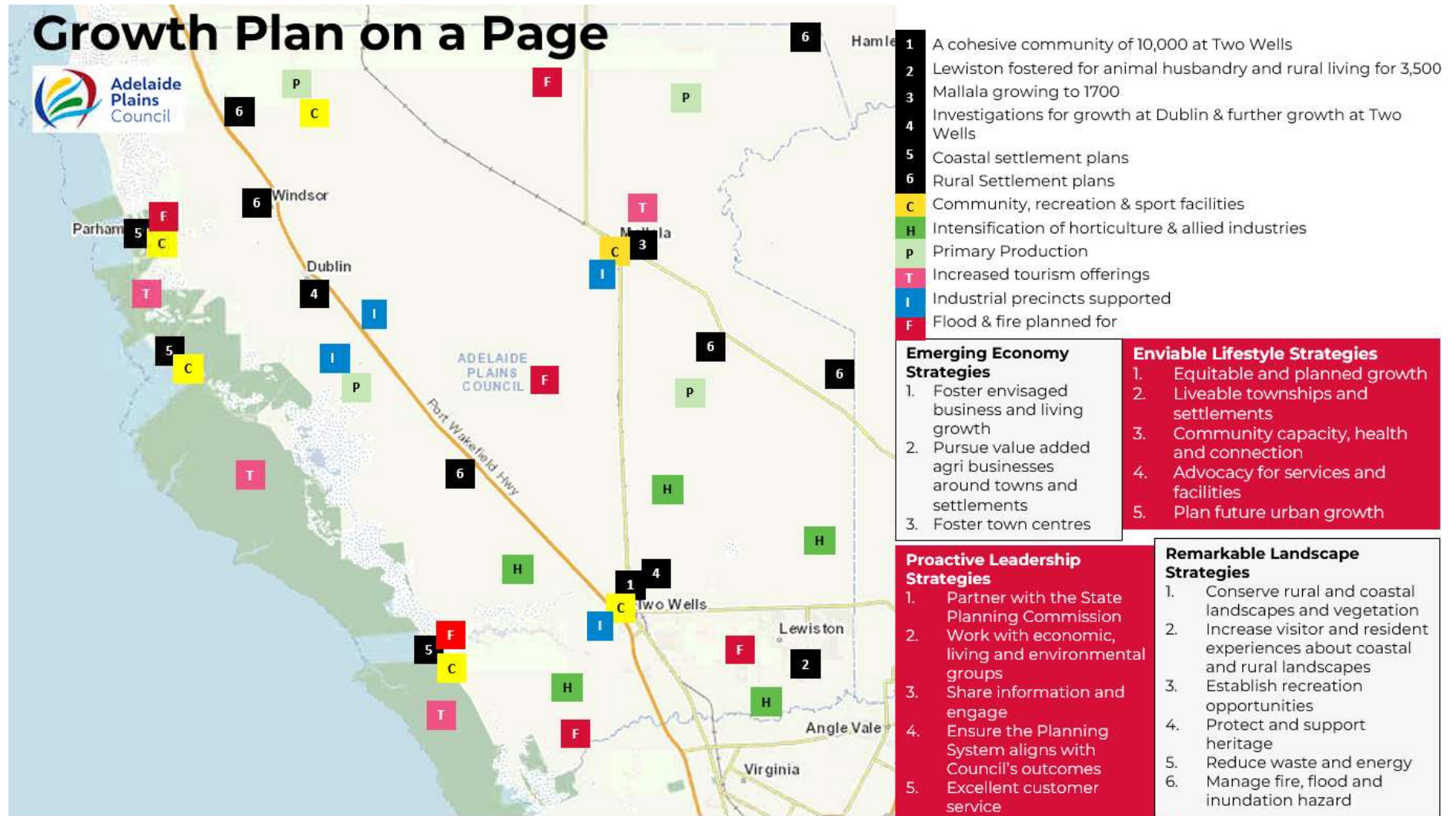
Council has a Long-Term Financial Plan looking forward 10 Years. This was released for consultation in late 2021. The LTFP includes various studies informing planning for growth.

These studies are referenced with relevant growth actions with the text ‘Consultation LTFP late 2021’.



How the Growth Strategy and Action Plan relates to Council’s Four-Year Plan, Long Term Financial Plan, and Asset Plans, as well as the 30 Year Plan For Greater Adelaide

GROWTH PLAN ON A PAGE



A summary of planning for Adelaide Plains growth

THREE TOWN SERVICE MODEL

Adelaide Plains is envisaged with three major towns and 12 coastal and rural settlements.

As Adelaide Plains grows, growth planning is seeking to foster liveable and sustainable outcomes across these townships and settlements, and with the aim for a range of services and facilities to be reasonably convenient and accessible.

This includes community and recreational facilities, health and education, employment options, and a variety of transport options.

This is in the context of nearby envisaged growth in the City of Playford, Gawler and Light Regional.



TWO WELLS

Arising from decisions in 2010 - 2012, planned urban growth is envisaging a Two Wells of around 10,500.

This growth is around 80% of growth planned in Adelaide Plains.

Strategy

'A cohesive country community of 10,500' is the strategy for Two Wells.

'Cohesive' recognises fostering 'a' community with many new people moving into a 'country' town is important.

The Actions are summarised in the Image.

Actions specific for Two Wells are placed together under the outcome areas.

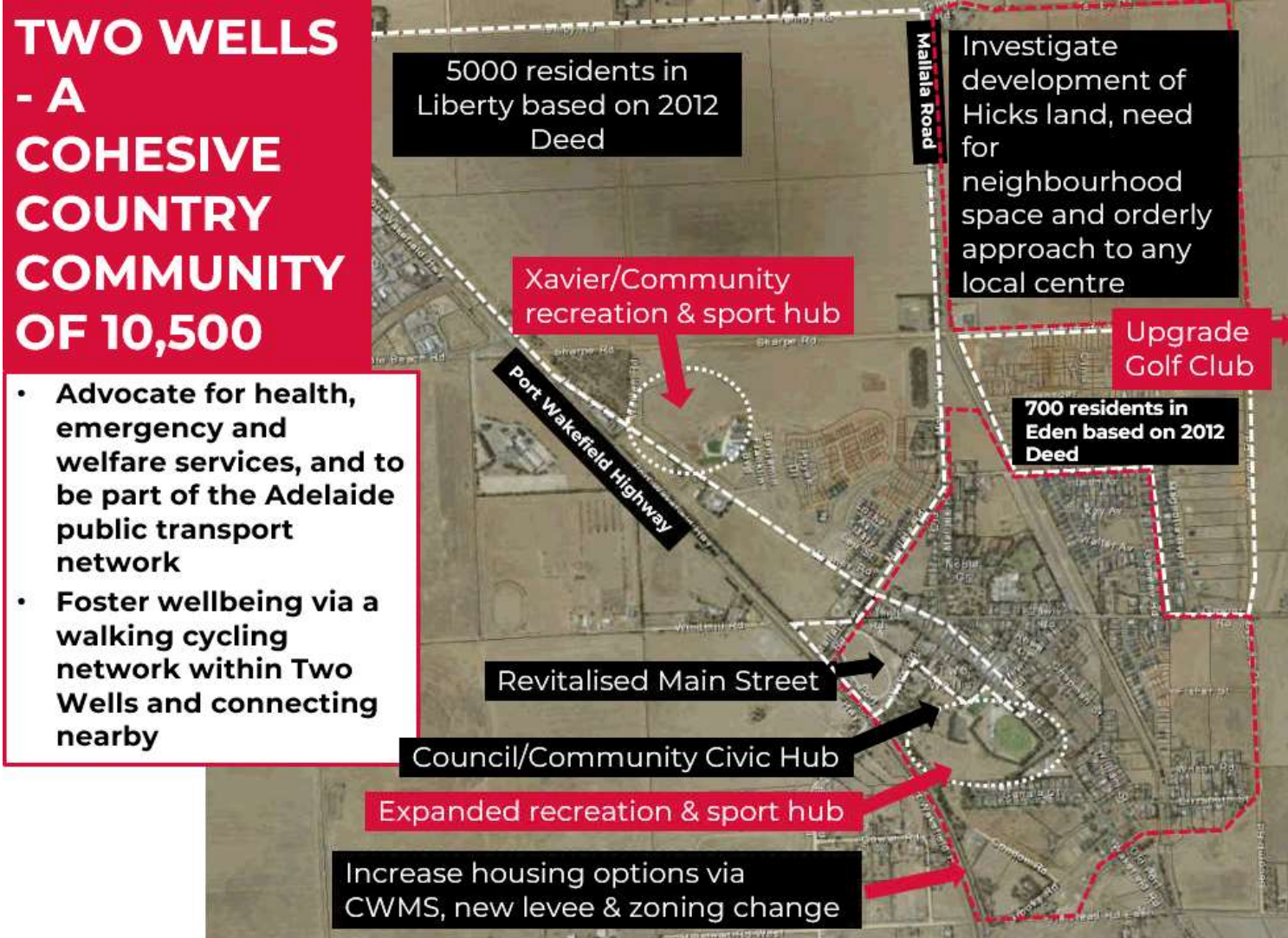


Image – Summary of Two Wells Actions to Support a Cohesive Community of 10,500

What is Needed and When

This table summarises what is needed and when at Two Wells.

	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	
Population	3256	3636	4016	4396	4776	5156	5536	5916	6296	6676	7056	7436	7816	8196	8576	8956	9336	9716	10096	10476	10856	
Town Centre	Facilitate growth of Two Wells Main Street through development of contemporary retail offering																					
Community Civic Hub	Plan and deliver community civic hub																					
Xavier Recreation Precinct	Work with Xavier on vision, noting Deed requiring oval, soccer field, and two courts for netball/tennis and shared school/community use																					
Town Centre Recreation Precinct	Plan and create upgraded sport and recreation precinct adjacent the Town Centre. Consider need and business case for indoor recreation. Consider Crown Land and land adjacent Cemetery.																					
Local Northern Centre & Recreation Precinct	Noting potential 2,500 in Hicks, investigate and advocate for a local centre to provide convenience goods and services in the northern part of Two Wells. Consider colocation with recreation and sport uses, and a community/shared hall or space. Consider range of locations, including adjacent Mallala Road.																					
Increased Housing Choice		Rezone land inside levee. Consider options for large sites																				
Walking Cycling Network	Prepare Plan		start delivery			Update	continue delivery															
Public Transport incl interchange and EV's	Ongoing advocacy and planning																					
Town CWMS	Plan and install. Note this opens up housing choice																					
Hicks	Scope Hicks potential for 2,500 residents to inform a position in 2026 EFPA review.																					

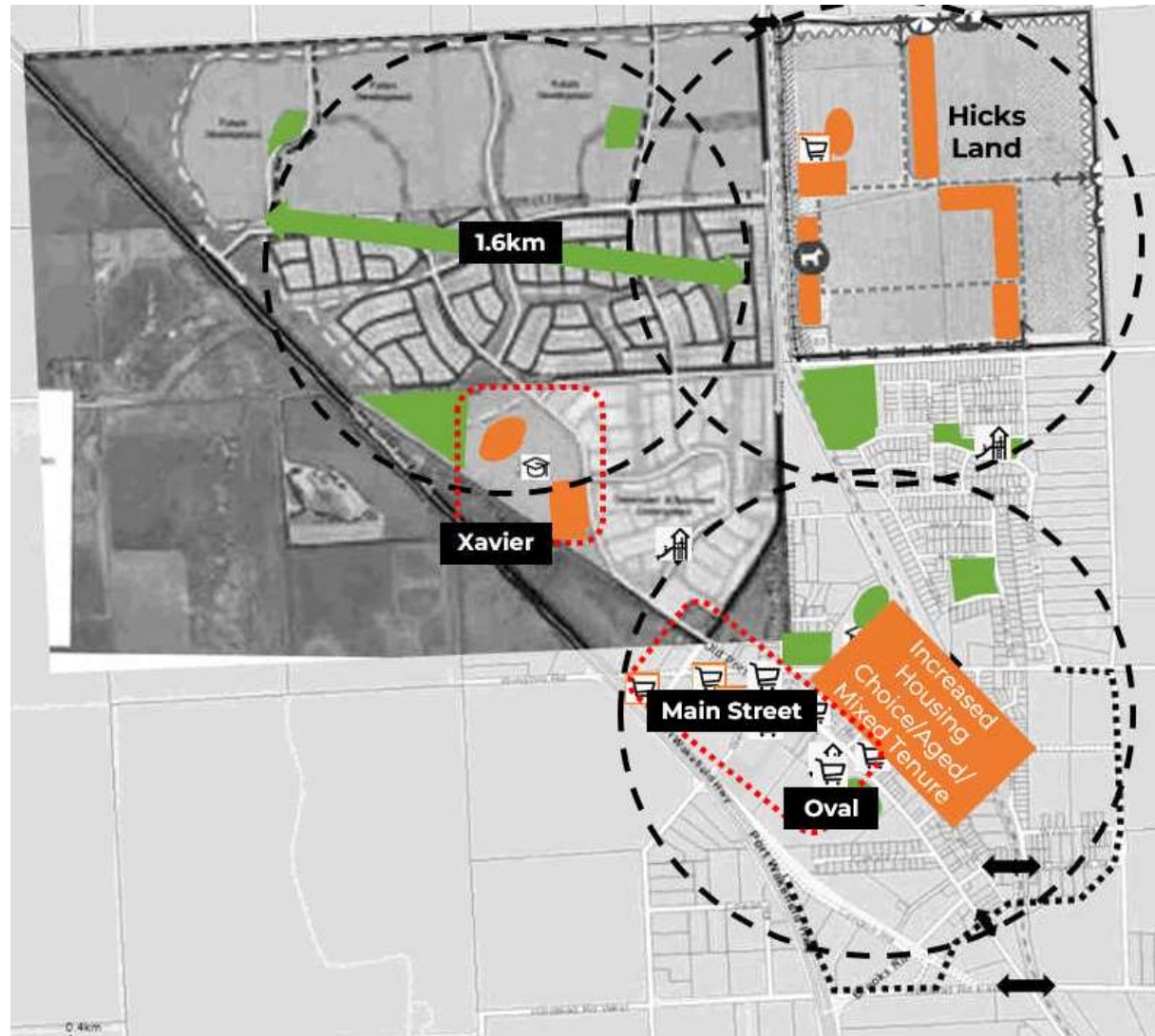
One Scenario for Two Wells

Liberty is a significant expansion of Two Wells. Council supports further growth to the north east on what is referred to as the 'Hicks' land. This requires further investigation.

If Hick's goes ahead, challenges are around how this influences Two Wells overall.

There are a variety of scenarios. In the scenario on the map:

- The Main Street is revitalised via retail development, increasing housing choice and aged housing throughout the original township, and the Oval precinct regenerated,
- A Greater Xavier Recreation Precinct for school and community purposes is established
- The Hicks land is developed for housing with investigations considering the need for neighbourhood space, an orderly approach to any local centre, and benefits of collocation with sport and recreation. The Australian Rail Track Corporation advises grade separation needed to gain access across the train line. This needs further investigation.



STRATEGIES AND ACTIONS

This part of the Growth Strategy and Action Plan forms the strategies and actions.

The strategies and actions are structured based on the Strategic Plan outcomes of Enviably Lifestyle, Emerging Economy, Remarkable Landscapes and Proactive Leadership.

Strategies are the strategies to be pursued to achieve the outcomes and Actions are how the strategies are to be achieved.

- Short term
- Medium term
- Ongoing informs operational activity



Freedom Park at Liberty, Two Wells - Planning for infrastructure fosters liveability

Enviably Lifestyle

Strategic Plan 2021 - 2024

Arrest the departure of younger population through affordable housing, access to diverse employment opportunities, regional university pathways and retail/recreation. Support retention of older community members through compact living with ease of access to improved retail and services in townships. Add to the vibrancy of towns through events, volunteering opportunities and community initiative funds or service support.

- Manage growth to sustain and activate our townships
- Provide, support and acquire facilities, assets, services and programs that build community capacity, health and connection
- Advocate for increased health, education, aged care and youth services, welfare and emergency facilities and services.

What do We Know

Adelaide Plains is part of Greater Adelaide and experiencing demand for urban growth. Much of this is already planned through the zoning established in the Planning and Design Code, reinforced by the Environment and Food Production Area (EFPA), at Two Wells, Mallala and Lewiston. Considering future urban growth, such as at Hicks Two Wells, and Leinad land at Dublin, needs to have regard to their local context, local needs, as well as their potential impact in the market. Established settlements along the coast and within agricultural areas are constrained for environmental and food production purposes. These will each need an approach based on the unique context of each. Noting decisions enabling planned growth at Two Wells and Mallala, Dublin and the surrounding areas in the north west of the Council area are a focus for more investigations.

Providing further housing choice is important, including affordable, aged, short term worker and for tourism. Having a planned approach to moving – be it freight, public transport, or being ‘active’ for health - is an important part of planning for growth.

The 2016 Open Space Study identified for the growth at Two Wells and noting lack of sport facilities in Lewiston, the potential need in total for three ovals, two cricket pitches, three soccer pitches, an eight tennis court facility, and four netball courts. An ideal option was soccer pitches overlaid by a further oval. Noting Xavier College intended oval and sports field, existing facilities at Two Wells Oval, lack of facilities in Lewiston, there is a need for a planned approach to recreation and sport infrastructure.

The 30 Year Plan envisages providing community facilities ‘in advance’. For Two Wells, this is reflected in the Hickenbotham/Council Deed envisaging facilities be provided neither significantly in advance nor significantly after when they are needed. Council’s civic, library and community facilities,

as well as the Golf Club need repurposing with a vision associated with planned growth. Ongoing advocacy for generally State provided facilities, be it SAPOL or educational, to service growth at Two Wells will be important.

Enviably Lifestyle Strategies

1. **Equitable and planned growth** acknowledging the distinct history, identify, needs and future of each of Adelaide Plains’ towns and settlements.
2. **Foster liveable townships and settlements** through influencing planned urban development and working with development partners, infrastructure providers, government and local communities.
3. Build community capacity, health and connection through:
 - o planning for timely provision of suitable infrastructure to enable an enviable lifestyle
 - o community and stakeholder participation in town and settlement planning processes.
4. **Advocate for increased services and facilities** with respect to health, education, aged care, youth, and welfare and emergency services.
5. **Plan for future urban growth** including at Dublin and the Hicks land at Two Wells

Enviably Lifestyle Action Plan

	Actions	Next Steps
1.	<p>Land supply and demand - Monitor to understand likely timing and nature of future land releases for urban growth. Consider level of infrastructure needed, and an orderly approach to land release. This is at Two Wells, Dublin and Lewiston, and also associated with the next review of the Environment and Food Production Area in 2026.</p> <p>Key Liaison - State Planning Commission</p>	Ongoing
2.	<p>Housing options – monitor dwellings being provided to meet housing needs, including for ageing resident and seasonal workers. This includes at Two Wells consequent on CWMS enabling increased housing choice, and rezoning land inside the levee.</p> <p>Key Liaison – SA Housing Authority</p>	Ongoing

3.	Art and Culture – investigate and establish a strategy to foster throughout the Council area. In particular in town centres, open spaces and associated with the Kaurua and colonial history and culture across the Council area.	Investigate in Short to Medium Term
4.	Council Service Hubs - Provide suitable multi-use facilities for Council services that serves the Council area as a whole.	Investigate in Short to Medium Term
5.	Mallala - continue to support planned urban development – in particular but not exclusively the Gracewood development - and the necessary infrastructure to occur. Progress Mallala Oval Master Plan. LTFP 28 Feb 2022 <ul style="list-style-type: none"> • Social and Community Infrastructure Plan \$100k 22/23 • Open Space & Recreation Strategy \$60k 22/23 • Stage 1 Two Wells/Mallala Ovals Master Plan \$100k 22/23 	Investigate in Short to Medium Term
6.	Lewiston - identify a preferred future through investigating and engaging. Consider: <ul style="list-style-type: none"> - The aspired land use mix into the future, noting trends in agriculture, equine and living - Opportunities to enhance the gathering point at Hayman/Pederick - Options to improve connectivity – including walking, cycling and equine – to Two Wells, north, east and south - Flood risk 	Investigate in Short to Medium Term
7.	Dublin – scope future urban growth to the south and west, noting 2019 Council decision to support investigating Leinad land south of existing township. Consider near coastal tourism role, agriculture, proximity to established industries and Carslake Industrial Area, community and open space facilities, recreation and sport, water reuse and necessary infrastructure. LTFP 28 Feb 2022 <ul style="list-style-type: none"> • Dublin Township Growth & Tourism Master Plan \$50k 22/23 	Investigate in Short to Medium Term
8.	Walking and Cycling - Prepare walking and cycling plans as part of town/settlement plans. Take into account the ‘link and place’ approach, and improving amenity at transport stops	Investigate in Short to Medium Term

9.	Design Quality – establish measures addressing Council’s approach to design quality of public realm, open space, and recreation and sport facilities. Consider universal design, surface quality to be fit for purpose, wayfinding, lighting, meeting required standards, water sensitive urban design, and energy efficiency .	Ongoing
10.	Settlement Plans – progressively prepare integrated plans across living, business and tourism, and environment for the coastal and rural settlements. Work with local communities to support local facilities/services, including considering walking, cycling and recreation and sport. The intent is tailored plans for each settlement.	Ongoing
11.	Two Wells Health, Emergency and Welfare Services – advocate for a suitable range, including associated with growth.	Ongoing
12.	<p>Two Wells Recreation and Sport Needs - understand needs (including scope of multi-use centre and existing oval precinct). Have regard to Xavier School oval, sporting field, and potential for shared use. Consider possible opportunities for recreational vehicle parks, the Hicks land and indoor sporting, noting a 50,000 population is typically needed for viability.</p> <p>LTFP 28 Feb 2022</p> <ul style="list-style-type: none"> • Social and Community Infrastructure Plan \$100k 22/23 • Open Space & Recreation Strategy \$60k 22/23 • Stage 1 Two Wells/Mallala Ovals Master Plan \$100k 22/23 <p>Key Liaison - Office of Recreation, Sport and Racing, City of Playford</p>	Investigate in Short Term
13.	Two Wells Recreation and Sport Hubs - following investigations and master planning, establish suitable community recreation and sport hubs. This may be an expanded Two Wells Oval Recreation and Sport Precinct, augmented offerings near/at Xavier, a northern precinct noting potential growth at Hicks, and a range of neighbourhood and local hubs. Ensure facilities include water and energy saving features, meet required standards, and are lit and of suitable surface quality to be fit for purpose.	Medium Term

14.	<p>Two Wells Community/Civic Hub - investigate needs and contemporary Council multi-use options (business, community, cultural) to inform master planning for multi-use facilities. Consider existing facilities including community centre.</p> <p>LTFP 28 Feb 2022</p> <ul style="list-style-type: none"> • Social and Community Infrastructure Plan \$100k 22/23 	Ongoing
15.	<p>Two Wells CWMS - for the original township, establish a CWMS following investigations and engagement. (study with LGA underway)</p>	Investigate in Short Term
16.	<p>Liberty and Eden Estates – partner with Hickinbotham Group based on the agreed Deed</p>	Ongoing
17.	<p>Two Wells Transport Options - advocate and plan for:</p> <ul style="list-style-type: none"> • Appropriate public transport provision, including investigating and planning for an interchange including with a park n ride facility. • Electric vehicle charging points <p>Key Liaison – Department of Infrastructure and Transport</p>	Ongoing
18.	<p>Two Wells Housing Options - Increase housing options through amending the Planning and Design Code associated with increased hazard protection arising from the levee and having a planned approach consequent on the original township CWMS. Consider options to support partnership development proposals for higher density and mixed use, as well as health, aged care and mixed tenure on large sites.</p>	Investigate in Short Term
19.	<p>Two Wells Walking and Cycling - Prepare walking and cycling plan. Take into account the ‘link and place’ approach, and improving amenity at transport stops (commenced)</p>	Short Term
20.	<p>Two Wells Golf Club – Noting services a regional market and majority of land owned by Council, work with the Golf Club to establish a vision and delivery plan. seek increasing water and energy saving in recreation and sport infrastructure</p> <p>Amend relevant Actions and Background Paper about recreation and sport facilities meeting required standards and being lit and of suitable surface quality to be fit for purpose</p>	Ongoing

21.	<p>Two Wells Hicks land – scope future urban growth, noting in principle support to investigate decision of Council in 2019. Consider housing mix, recreation and sport, water reuse, the train line and Mallala Road, and orderly connections with Two Wells.</p> <p>The potential urban development of the Hicks land immediately to the east of Liberty and separated by Mallala Road and the ARTC train line will need to involve the Hickinbotham Group, DIT and ARTC as key stakeholders amongst others.</p> <p>Continue with Growth Strategy action seeking the urban development of the Hick’s land, noting this involves seeking lifting of the Environment and Food Production Area, rezoning, and suitable infrastructure agreements.</p>	Medium Term

Emerging Economy

Strategic Plan 2021 - 2024

Facilitate growth of the business sector through strategic advocacy, partnerships and service improvements that generate local procurement and employment opportunities, provide certainty for investment and enhance the appeal and visitor experience delivered by Council's key tourism strengths and opportunities.

- Support the growth of primary industries and the introduction of value-add employment generators
- Facilitate greater access to local opportunities from public and private investment
- Reinforce Adelaide Plains Council as a place of choice for business, residents and visitors.

What do We Know

The Planning and Design Code contains the policy against which proposed development is assessed. After significant investigations, the Code was established in 2021. How well the Code enables or discourages appropriate development to grow the economy needs monitoring.

Tourism experiences are centred on key attractors, notably the Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara and Mallala Motor Sport Park. Town centres play a key role for local businesses and economically.

Agriculture is changing, with greater value adding on farm and in commercial operations. Horticultural and agribusiness growth is supported in the southern part of Adelaide Plains around Two Wells, noting current water challenges.

Emerging Economy Strategies

1. Foster envisaged business, visitor, and living growth through:
 - a. Targeted reviews to ensure policy and regulatory arrangements – including the SA planning system – are current. This includes around agriculture, renewables, town centres, and tourism.
 - b. Advocating and planning for needed infrastructure

2. **Pursue a vision of value-added agricultural businesses** providing localised employment around liveable towns and settlements. This includes a vision of including horticulture and animal husbandry south of the Light River around a growing Two Wells township and through Lewiston
3. **Foster established town centres**, principally at Two Wells Main Street, Mallala Town Centre and centre functions at Dublin.

Emerging Economy Action Plan

	Actions	Timing
1.	<p>Development Trends - monitor agricultural, horticultural, value adding, retail and tourism development trends in order to test the currency of the Planning and Design Code – including land supply/allotment sizes/EFPA - to support appropriate economic development of Adelaide Plains.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Agricultural and food-based business clustering, precincts and estates near townships • Hubs around infrastructure • Adventure and tourism based, such as motorsport, equestrian, gun clubs, shorebirds and coastal. 	Ongoing
2.	Water - advocate for suitable pricing for the NAIS water (underway)	Investigate in Short to Medium Term
3.	Renewable Energy – investigate and foster take up, including associated with primary production	Ongoing
4.	<p>Transport – plan and advocate for integrated transport planning to service living and business, including connecting with Ports in Adelaide, interstate, air based, and for a suitable range of community and public transport. Consider all the modes including passenger and business vehicles, trains and buses, walking, cycling and equine.</p> <p>Amend Transport Action to reflect intent to plan for road/trail networks including for physical activity.</p> <p>Key Liaison – Department of Infrastructure and Transport.</p>	Ongoing
5.	Employment Land Plan – adopt a coordinated approach to establishing employment precincts, such as Carslake Road, with appeal and necessary infrastructure	Investigate in Short to Medium Term

6.	<p>Two Wells Main Street—reinforce the primary role of the Two Wells mainstreet.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Upgrade the main street public realm • Progress the 8HA Crown land development for a mix of commercial, retail and community facilities. • Support the development of large undeveloped sites near the main street for increased housing choice, aged housing, short term workers accommodation, and for visitor accommodation (including recreational vehicle parks). • Planning for a variety of movement modes, including walking, cycling, business needs, buses, recreational vehicles, and visitors. 	Investigate in Short to Medium Term
7.	<p>Northern Two Wells - Investigate need for neighbourhood space and orderly approach to any retail in the northern part of Two Wells, in particular as part of investigations for the Hicks land. Any retail cannot be of a size to threaten the primary function of the Two Wells Main Street.</p> <p>Two Wells Northern Centre – investigate and advocate for an orderly approach to centre planning in the northern part of Two Wells.</p>	Investigate in Short Term

Remarkable Landscapes

Strategic Plan 2021 - 2024

Advocate for Government investment in the Gawler and Light River Catchments and coastal townships, liaise with and support agencies responsible for adverse event mitigation and response, maintain a mix of waste management services and increase community education and lever volunteering opportunities and multiple State agency agendas to target the enhancement of coastal visitor experiences.

- Protect and enhance our coastal and riverine landscapes, native vegetation and heritage
- Mitigate the impacts of adverse natural events on the community
- Improve resource recovery and carbon and waste management.

What do We Know

Adelaide Plains has distinct rural and coastal landscapes, with the Adelaide International Bird Sanctuary dominating the coast. More work is needed to enable visitors and residents to fully experience these in suitable ways.

Suitable policy and supportive measures for built heritage are being progressed, with a review of the 1983 heritage survey commencing in 2021.

Whilst much work has been completed around greening, habitat and waste, more work to maximise benefits from these areas is needed.

Planning and Land Use Services (state government) are undertaking investigations and Amendments to the Planning and Design Code with respect to the hazard of fire and flood risk associated with Gawler and Light Rivers. These are SA wide investigations. Ongoing investigations are underway with respect to managing flood risk by the Gawler River Flood Management Authority. With grant funding, at Two Wells, Council is installing a levee to the east and south of town to reduce the hazard impact associated with Gawler River. Regarding coastal inundation, past studies are informing contemporary Community Emergency Management Plans for each settlement. Past studies identify particular hazards at Middle Beach. Better planning for risk improves investment potential.

Remarkable Landscape Strategies

1. **Conserve rural and coastal landscapes and vegetation** of biodiversity against the pressures of projected population growth.
2. Increase visitor and resident experiences through leveraging coastal and rural landscapes and vegetation augmented by private and public investment.
3. **Advocate for recreation opportunities** associated with Gawler and Light Rivers, and the coast.
4. **Protect and support heritage** properties assessed as being of value.
5. **Reduce the waste and energy** footprint of new development.
6. **Manage impact of fire, flood and inundation risk** through having contemporary development guidelines based on professional investigations.

Remarkable Landscape Action Plan

	Actions	Timing
1.	<p>Visitor and Resident Experiences - pursue opportunities to establish private and public infrastructure to enable visitor and resident experiences, such as:</p> <ul style="list-style-type: none"> - Trails strategy for walking, cycling and equine - Associated with the Adelaide International Bird Sanctuary and coastal settlements, as well as the Gawler and Light Rivers. - Associated with landscaped based recreation, including walking, cycling, equine, and adventure based. - Visitor accommodation options - Cohesive visual approach to entrances and other physical features of towns - Supportive SA Planning system. 	Ongoing
2.	<p>Heritage Conservation - In consultation with owners, progress heritage designation of buildings assessed as being of heritage value (Stage 1).</p>	Investigate in Short Term
3.	<p>Heritage Conservation - Undertake further assessments of heritage value, building on the updating of heritage survey in 2021</p> <p>LTFP 28 Feb 2022</p>	Investigate in Medium Term

	<ul style="list-style-type: none"> Heritage Survey Part 2 \$27k 22/23 	
4.	Heritage Support - Establish heritage advisory service and incentives scheme.	Ongoing
5.	Greening and Canopy – investigate options, including: <ul style="list-style-type: none"> townships as built features increase, in particular: <ul style="list-style-type: none"> open space areas to increase amenity value for residents walking and cycling routes infrastructure major developments public and private land in rural areas. 	Ongoing
6.	Habitat restoration – investigate opportunities for large scale habitat restoration.	Ongoing
7.	Waste – investigate options to reduce waste associated with new development. This includes fostering the circular economy.	Investigate in Short to Medium Term
8.	Carbon Footprint – investigate options to reduce carbon footprint associated with new development.	Investigate in Short to Medium Term
9.	Fire Risk – Participate in the investigations and Code Amendment underway by Planning and Land Use Services and CFS (SA Government) to better guide development. Better planning for fire risk improves investment potential.	Investigate in Short Term
10.	Gawler and Light River Flood Risk - Participate in the investigations and Code Amendment underway by Planning and Land Use Services (SA Government) to better guide development. Seek least impact on agricultural productivity associated with flood mitigation.	Investigate in Short Term
11.	Coastal Inundation Risk – update Community Emergency Management Plans for each coastal settlement coordinated with asset planning. Noting the particular hazard profile at Middle Beach, consider the best long term approach for Middle Beach. Better planning for inundation risk improves investment potential, including for tourism based purposes.	Investigate in Short to Medium Term

Proactive Leadership

Strategic Plan 2021 - 2024

Proactive engagement in new and existing regional partnerships, pursuit of funding and exploration of new revenue opportunities will create value for the region and rate payers. Early engagement in reform will support opportunities for continuous improvement. Setting a strategic financial agenda with regard to sustainability ratios will open up investment opportunities for the delivery of Council's strategic plan, and a continued emphasis on engagement and consultation will raise awareness, understanding and participation by an increasingly active community regarding Council's intent and progress.

- Actively seek funding and partnerships to deliver Council initiatives
- Actively engage with and inform our communities
- Strategic and sustainable financial management
- Proactively engage in Local Government Reform and continuous improvement.

What do We Know

As a service and infrastructure organisation, Council needs a coordinated approach to managing and facilitating growth that leads to liveable and economic towns, settlements and districts. A strategy for growth informs operational and service decisions, including how Council works with local business and residents, local groups, other spheres of government, other councils, infrastructure providers, and the development sector.

Funding Opportunities

- Council Long Term Financial Plan
- Private Funding – Developer Contributions
- State and Commonwealth Government Funding, including:
 - Planning and Development Fund

The level of success in achieving the GSAP depends upon cooperation between the public and private sectors, in particular:

(a) Adelaide Plains Council:

(ii) Promote the GSAP to all levels of government, private sector partners and the South Australian community, creating the necessary impetus to generate positive change.

(iii) Provide a framework for influencing the SA Planning System, including amending the Planning and Design Code, to support the GSAP.

(iv) Updating the GSAP to ensure it remains relevant.

(i) Continue its holistic, whole-of-government, approach to decisions to ensure that support the GSAP, including integrating with all Council's strategic documents including:

- Long term financial plan
- Tourism and Economic Development Strategy
- Recreation and Open Space Strategies
- Asset Management Plans
- Social and Community Service Plans
- Environmental Plans
- Other plans.

(b) State Government:

(i) Improve strategic transport links with metropolitan Adelaide aligning with the GSAP.

(ii) Support public service provision and incorporation of GSAP policies into the 30 Year Plan for Greater Adelaide, and where relevant, the Planning and Design Code.

(c) Infrastructure/utilities providers, to deliver, in a timely, coordinated and efficient manner, all transport, water, gas, electricity, information and communication technology, health and community services infrastructure required to support the GSAP.

(d) Land owners and developers:

(i) Participate in planning that supports the GSAP.

(ii) Enter into agreements with Council and State Government to fund infrastructure to support the GSAP.

(iii) Work with Council to establish and promote a consistent and recognisable Adelaide Plains offering for marketing and promotion of major developments.

(iv) Provide affordable and diverse housing.

(e) Australian Government to support policies and initiatives – including grant funding – that aligns with the GSAP.

The impact of above actions not being undertaken will need to be considered and the GSAP reviewed as necessary.

Proactive Leadership Strategies

1. **Partner with the State Planning Commission** and other Australian, State and local government entities to pursue liveable growth outcomes
2. **Maintain working relationships** with economic, living and environmental groups of Adelaide Plains
3. **Share information and engage** with the Adelaide Plains community to influence liveable growth.
4. **Ensure the SA Planning System is aligned with Council’s outcomes** and up to date for trends impacting Adelaide Plains. This includes the Planning and Design Code
5. **Provide excellent customer service** for people looking to invest and undertake development.

Proactive Leadership Action Plan

	Actions	Timing
1.	Maintain formal and informal links with the State Planning Commission and Planning and Land Use Services	Ongoing
2.	Maintain collaborative relationships with local economic, living and environmental groups in progressing the actions. Work together based on values of integrity, respect, professionalism, innovation and open mindedness.	Ongoing
3.	Foster the Adelaide Plains Business Advisory Group in shaping and supporting delivery of the Tourism and Economic Development Strategy and relevant growth strategies and actions.	Ongoing

4.	Make information available and establish a planned approach to engagement about projects arising from the GSAP. This includes having a planned approach to community and stakeholder information and engagement for each project.	Ongoing
5.	Reference the GSAP in Council long term planning, including the Long-Term Financial Plan and Asset Planning, and in applications for grant funding	Ongoing

GROWTH BACKGROUND PAPER



May 2023

Contents

Purpose.....	4
About Growth	4
About Adelaide Plains	4
OBSERVATIONS.....	5
30 Year Plan for Greater Adelaide.....	7
Liveable Growth.....	7
Planned Urban Growth	8
Investigations Undertaken and Underway.....	10
Population and Development Trends.....	12
Residents.....	12
Residential Building Approvals.....	14
Value of Approvals.....	15
Jobs Growth/Employment.....	16
Current and Emerging Community Profile	18
Resident Satisfaction.....	24
Housing.....	25
Towns and Settlements.....	29
Two Wells	29
Two Wells Main Street and Town Centre.....	30
Two Wells Original Township – Large Sites - CWMS - Levee.....	31
Potential Urban Growth – Hicks Land	33
Mallala	35
Dublin.....	36
Lewiston.....	39
Coastal & Rural Settlements	43
Economic and Social Facilities.....	44
Social Infrastructure and Community Services	44
Recreation and Sport Trends.....	50
Two Wells Recreation and Sport Infrastructure	51
Tourism Infrastructure.....	55
Telecommunication Black Spots.....	56

Utilities Infrastructure	58
Northern Adelaide Food Bowl and Irrigation Scheme	59
Council Assets	62
Transport.....	64
Car/Bus/Community Transport.....	64
Road and Rail Network.....	66
Electric Vehicles.....	67
Walking/Cycling/Equine.....	68
Environment.....	69
Natural Resource Management.....	69
Fire and Flood Hazards	70
Climate Forecasts to 2100.....	71
Heritage	74
Projected Urban Growth Rate 2021 - 2041.....	76
Comparing Two Wells and Mt Barker	80
Options for Future Planned Urban Growth.....	81
Local Government Impacts	82
Attachment A - 30 YEAR PLAN FOR GREATER ADELAIDE	83
Targets.....	83
Policies – Transit Corridors, Growth Areas and Activity Centres	85
Policies – Design Quality	85
Policies – Heritage	86
Policies – Housing Mix, Affordability and Competitiveness	86
Policies – Health, Wellbeing and Inclusion.....	87
Policies – The economy and jobs	89
Policies – Transport.....	91
Policies – Infrastructure.....	91
Policies – Biodiversity.....	93
Policies – Open Space, Sport and Recreation	93
Policies – Climate Change.....	94
Policies – Water.....	96
Policies – Emergency Management and Hazard Avoidance.....	96

Council acknowledges that we are on the traditional country of the Kaurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

Version	Comment
May 2023	Adopted 24 April 2023
April 2023	Refined following consultation
July 2022	Consultation ABS 2021 data available added.
July 2022	Consultation
August 2021	Council 23 August 2021

Purpose

The purpose of this paper is to summarise opportunities and constraints relating to the growth of Adelaide Plains.

The paper will inform staff, Councillors, other spheres of government, infrastructure entities, and local residents and businesses of issues to consider as urban growth continues.

This Paper informs the Growth Strategy and Action Plan.

About Growth

This background paper is focussed on urban growth (what can be called 'planned urban growth') that is both occurring, and will occur, in Adelaide Plains.

The key component of urban growth to date is residential growth at Two Wells. The background paper begins to address the issues that this growth will present to Council, along with the additional demands associated with this residential growth e.g. employment and services, and the opportunities this presents to Council and the community.

This paper includes summary information about economic growth recognising the relationship between residential and economic growth. This paper also provides an overview of recent and forecast long term growth influencing Adelaide Plains and draws observations about the challenges to be planned for.

About Adelaide Plains

Adelaide Plains Council is a vibrant community located about 45 kilometres north of the Adelaide CBD. With large areas of rural and horticultural land, Adelaide Plains Council also has a large tidal coastal region (47 kilometres of coast) facing the Gulf of St Vincent, a number of vibrant and historic townships and settlements and a rapidly growing urban areas in and around Lewiston and Two Wells.

Covering an area of 935 square Kilometres and containing both the Light River and Gawler River, along with almost 6000 rateable properties the Adelaide Plains Council provides a diverse economic base with a strong community focus. It is a place where people can choose to live and work locally, with quality services, facilities and open space that support community wellbeing and resilience. Adelaide Plains Council promotes the growth of tourism and encourages is a place that provides local opportunities.

OBSERVATIONS

Economic Growth is Bringing Change

1. Agriculture is changing, with greater value adding on farm and in commercial operations.
2. Horticultural growth is supported, particularly in the southern part of Adelaide Plains around Two Wells, noting current water challenges
3. Land for animal husbandry is being impacted by urban growth, bringing change in Lewiston.
4. Tourism experiences are centred around key attractors, notably the Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara and Mallala Motor Sport Park

Urban Growth is rapidly changing Adelaide Plains

5. Urban growth is impacting Two Wells, Adelaide Plains and northern Adelaide.
6. Demand at Two Wells is being driven by available and serviced land, government stimulus, the northern connector, and opening of facilities such as Xavier College.
7. 2021 ABS indicates growth in a younger population at Two Wells.
8. Two Wells is forecast to grow to around 10,500 in 2041. This is 5.8% per annum from 2016. By comparison, Mount Barker is 4.25% per annum. The numbers in the 2012 Two Wells Amendment were indicative and dependent on land development layouts, school and open space provision. Given the current and proposed development pattern, it is considered unlikely that Liberty would reach in excess of 3000 allotments. The Hickinbotham Group have progressed Eden, with the 265 lots mostly developed. Liberty envisages some 1,900 lots, noting the zoning allows upto around 3,000 lots.
9. Planned urban growth is yet to be taken up at Mallala.
10. Adelaide Plains population is likely to grow from 9,655 in 2021 to 18 - 19,000 by 2041 (20 years)

Options for Future Planned Urban Growth

11. Council decisions of 2019 support investigations for further planned urban growth at Two Wells (Hicks Land) and Dublin.

Council's Role in Growth

12. As a service and infrastructure organisation, Council needs a coordinated approach to managing and facilitating growth that leads to liveable and economic towns and districts, and in managing hazards.
13. A strategic growth perspective informs Council's operational and service decisions
14. A strategic growth perspective informs the role of State and Australian governments, and development, infrastructure and community partners.

Ongoing Investigations and Planning Is Needed

15. We have inadequate understanding about what demographics are forecast to move into Two Wells e.g. while total numbers can be estimated, population structure, age and composition still requires further investigation
16. What social infrastructure does a growing Two Wells need? How does growth impact Council's direct role in libraries, recreation, sport, parks and culture? How does growth impact the viability of public transport at Two Wells? What transport network might best serve a growing horticultural area and Two Wells township?
17. Investigations and discussions are needed to address these emerging gaps and further plans for the urban growth that is already underway and will continue over the next 20 years.

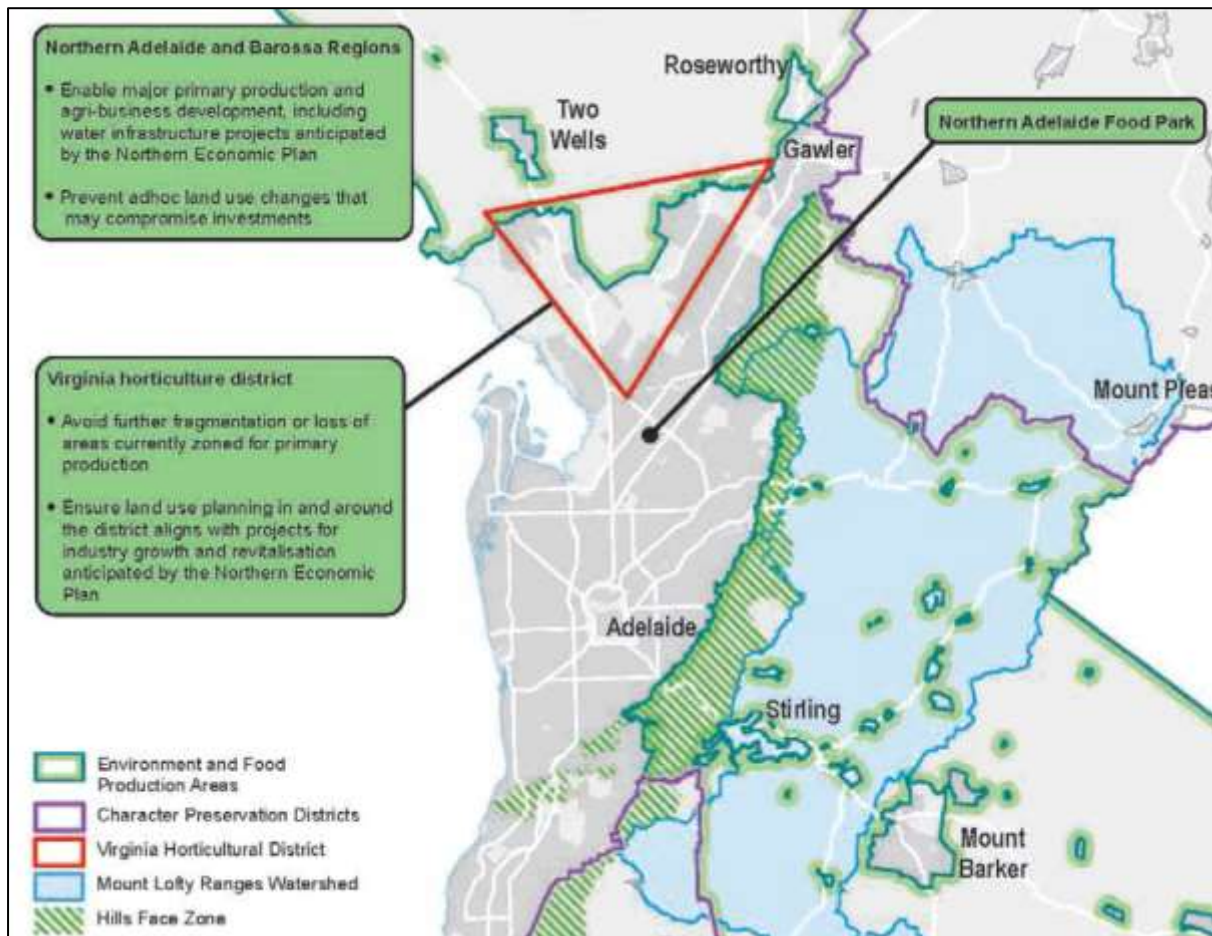
30 Year Plan for Greater Adelaide

Liveable Growth

The 30 Year Plan for Greater Adelaide¹ plans a region that is liveable, economically competitive, sustainable and responsive to climate change.

The Plans policies have been analysed for relevancy for Adelaide Plains (**Attachment A**).

Aside from towns and settlements, all of Adelaide Plains is within the Environment and Food Production Area, with the Two Wells and Lewiston area part of the Virginia Horticulture District.

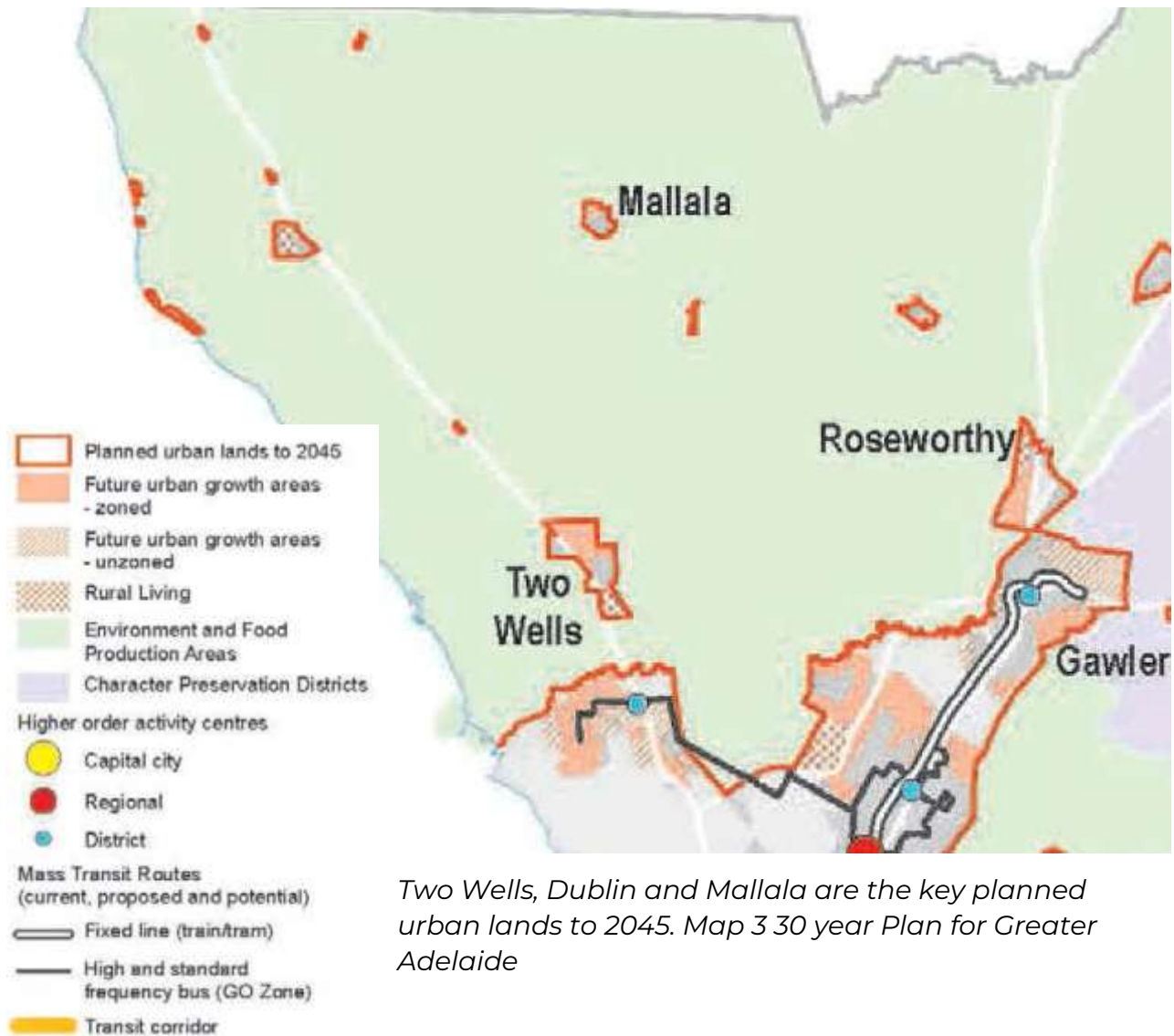


Two Wells/Lewiston is part of the Environment and Food Production Area and the Virginia Horticulture District. Map 3 30 year Plan for Greater Adelaide

¹ livingadelaide.sa.gov.au/

Planned Urban Growth

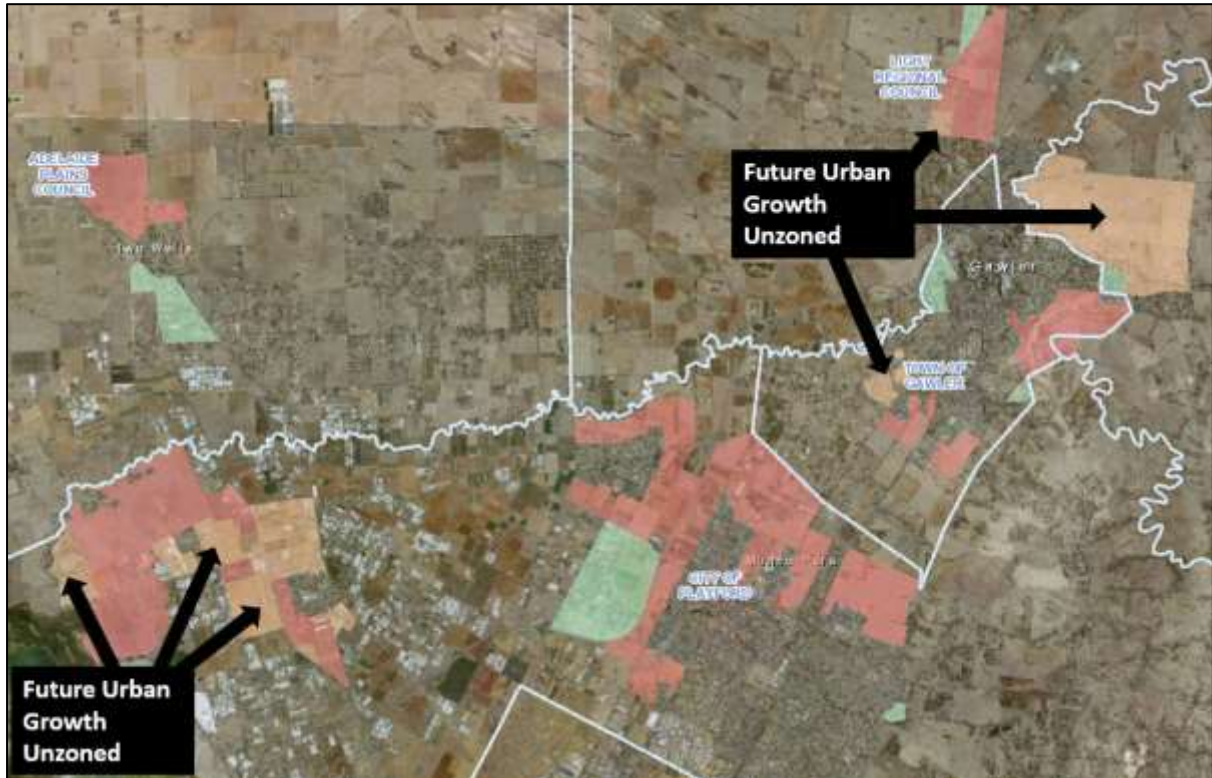
The 30 Year Plan identifies planned urban lands to 2045. This includes land already zoned and land to be zoned at some point in the future.



Two Wells, Dublin and Mallala are the key planned urban lands to 2045. Map 3 30 year Plan for Greater Adelaide

These extracts from the 30 Year Plan for Greater Adelaide demonstrate the significant areas of growth proposed within the Northern Adelaide Plains, including Adelaide Plains Council. Planned and future urban growth areas will require associated physical and social infrastructure to cater for the incoming population to this region.

Significant land areas are flagged for future urban growth but are yet to be released for that purpose by being rezoned. This includes land in Virginia east of the new Riverlea as well as east of Gawler.



Significant Areas are planned but yet to be rezoned For Future Urban Growth around Virginia and Gawler

The northern edge of Adelaide is planned for significant fringe growth, including within Two Wells.

The goals and policies of the 30 Year Plan for Greater Adelaide – being updated over 2022 and 2023 -influence how growth is to occur in order to achieve towns and communities that are liveable, sustainable and competitive.

Investigations Undertaken and Underway

Understanding existing investigations assists to consider the scope of further investigations. Numerous studies including by Council inform current planning of Adelaide Plains. The table arranges studies based on each particular focus.

Investigations Undertaken Influencing Adelaide Plains			
	Economic Focus	Social Focus	Environmental Focus
2022	Tourism and Economic Development Strategy Long Term Financial Plan	Equine Sector	Two Wells Traffic
2021	Planning and Design Code introduced	APC Office Accommodation (underway) Public Health Regional Heritage (underway) Trails (proposed) Cemetery Capacity	Gawler River flood study (underway)
2020	Two Wells CWMS Feasibility	Disability Access and Inclusion Plan Aged Housing	Adelaide International Bird Sanctuary Management Plan Two Wells Mainstreet Master Plan
2019	Hicks Two Wells/Leinad Dublin Rezoning Requests		Webb Beach Community Emergency Management Plan
2018	Food Bowl Development Plan Amendment	Residents Survey	
2017	Allied Food Industries Land Supply 2W2W Economic Corridor Accelerating Regional Growth from Two Wells to Whyalla		Gawler and Light River Floodplain Mapping Two Wells Stormwater Management
2015	NAIS Market Proving (Arris) Broadacre Farming	Lewiston Community Focal Points	

Investigations Undertaken Influencing Adelaide Plains			
	Economic Focus	Social Focus	Environmental Focus
	(Dublin township expansion - Minister declined to support) Equestrian/Horse Keeping Precinct		
2014	Mallala Township Development Plan Amendment Two Wells Retail Demand Strategic Directions (Development Act S30)		Adaptation Frameworks for Middle Beach, Thompson Beach, Webb Beach and Parham Two Wells Traffic Study
2013	Horticulture Framework Horticulture Plains State of Play Two Wells Residential Development Plan Amendment		Coastal Settlements Adaptation
2012 & earlier		Heritage 1983	Two Wells Main Street Design Guidelines 2011 Gawler River Open Space 2009 Mallala Transport 2005

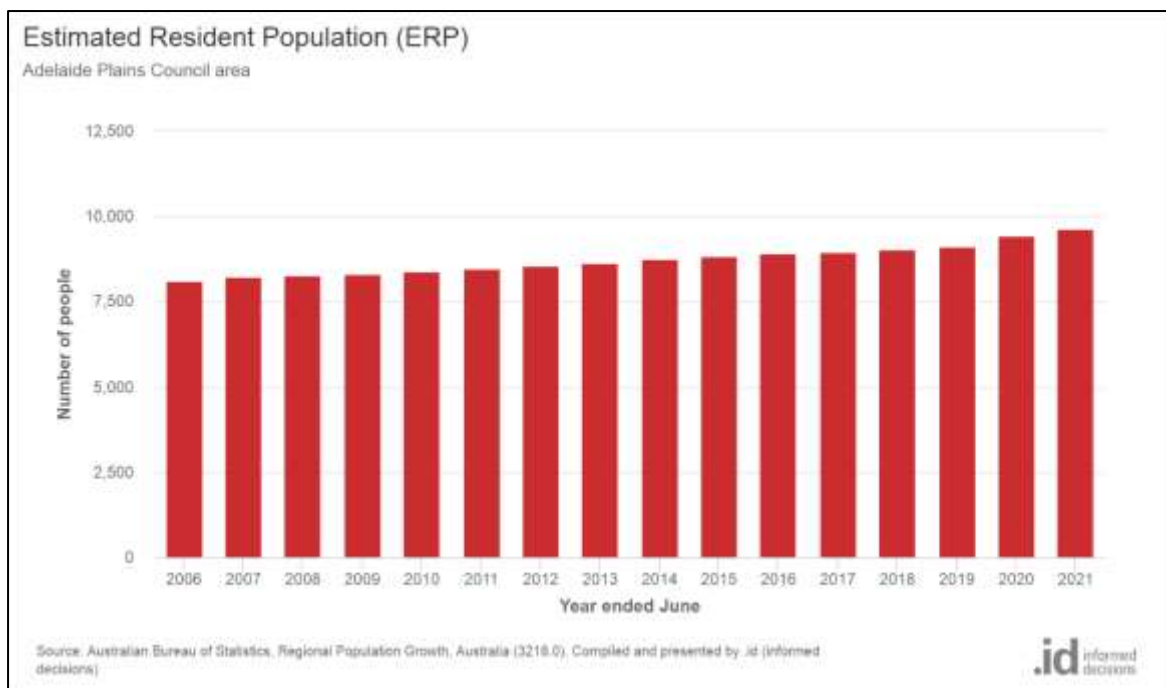
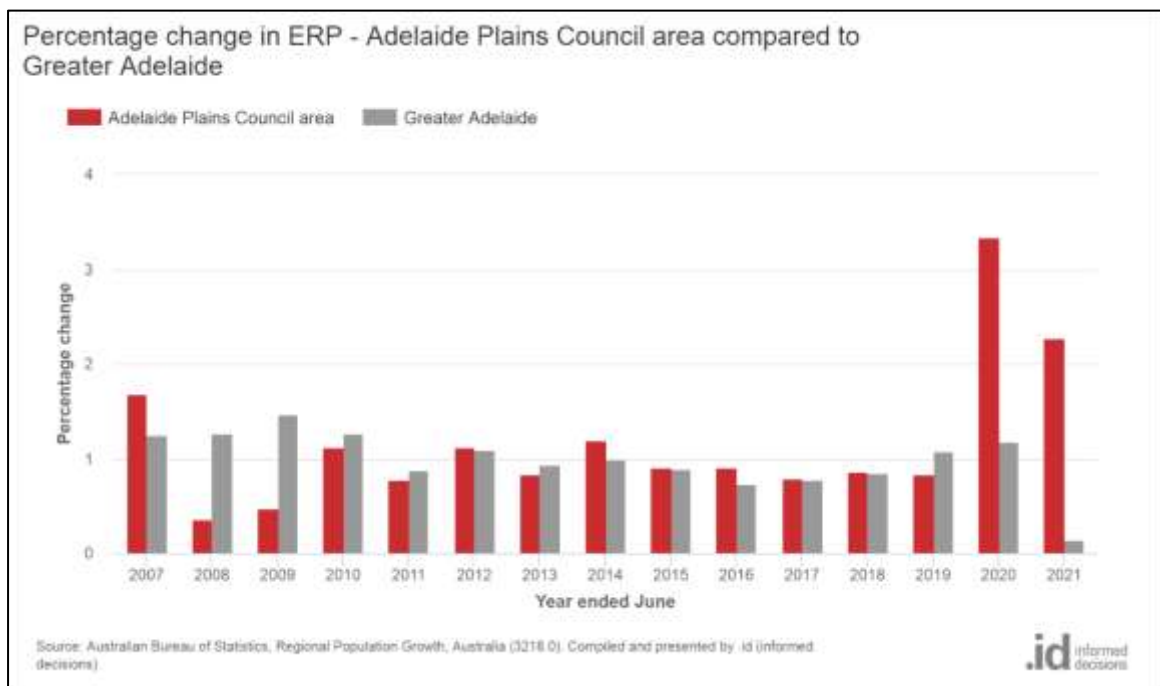
Population and Development Trends

Residents

Council's residential population has grown steadily from around 8,100 in 2006 to an estimated 9,655 in 2021. When compared to Greater Adelaide, Adelaide Plain's rate of residential growth has mirrored Greater Adelaide's small increases, aside from being slightly greater in 2007 and 2014.

2020 saw a 3.3% rate of growth, and 2021, 2.3% in Adelaide Plains.

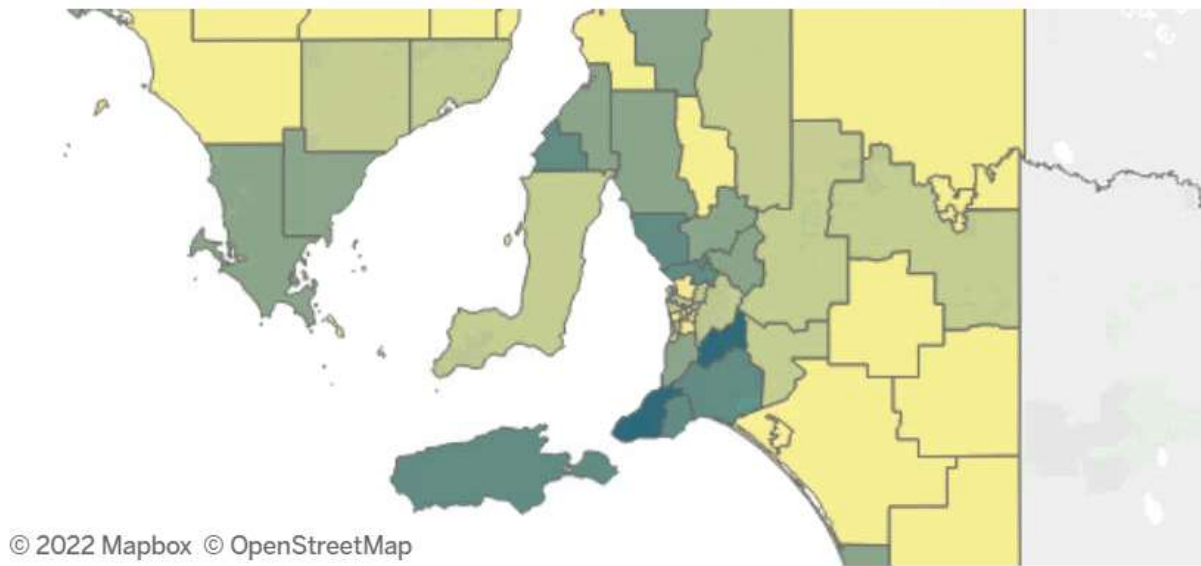
Both are markedly greater than Greater Adelaide's 1.2% in 2020 and 0.14% in 2021.



Regional population change, estimated residential population, by LGA, All, 2020 to 2021

South Australia

Click on map area for more information.



Population change, 2020 to 2021 (%)

- 2.5 or more
- 1.5 to less than 2.5
- 0.5 to less than 1.5
- 0.0 to less than 0.5
- Decline

State

South Australia

1,773,396 persons (2021)

1,770,277 persons (2020)

0.2% (3,119 people) change in population (2020 to 2021)

Adelaide Plains experienced 2.5% Population Change from 2019 to 2020, and 2.3% from 2020 to 2021

Within a Greater Adelaide context, along with Mt Barker and the CBD, Adelaide Plains experienced population change of 2.5% or more from 2019 to 2020².

² www.housingdata.gov.au/ accessed 27 May 2021

Residential Building Approvals

Since 2001, house approvals within Adelaide Plains have been around 50 – 70 each year.

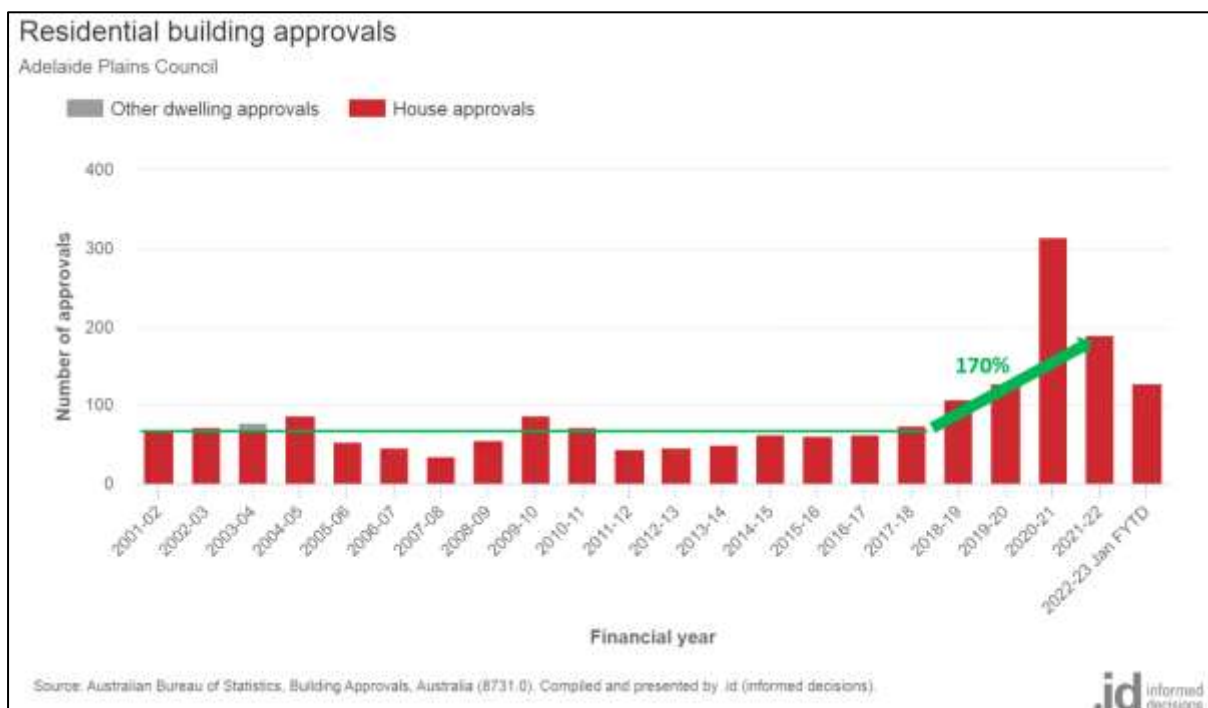
House approvals rose to 129 in 2019-20, 314 in 2020-21 and 189 in 2021-22.

If house approvals continue at around 189 per year, this is around 170% more than the average of 70 per year that was characteristic until around 2018.

Factors stimulating this rate include serviced and available greenfield land, government stimulus such as first home buyer and home builder, and the northern connector.

Adelaide Plains increasing dwelling growth rate is opposite to South Australia overall where rates have fallen annually since 2017-18.

Adelaide Plains increased rate of dwelling approvals was seen in Light and Playford till 2019-20 but reduced in 2020-21 similar to SA.



	17-18	18-19	19-20	20-21	21-22
Adelaide Plains	75	108	129 84% greater than 70 dwellings/annum typical 2001 - 2018	314 350% greater than 70 dwellings/annum typical 2001 - 2018	189
Light	66	73	98	163	122
Playford	819	940	1234	1495	1592

Dwelling Approvals Adelaide Plains Compared to Neighbouring Regions³

³ plan.sa.gov.au/state_snapshot/land_and_housing accessed 21 April 2021

Value of Approvals

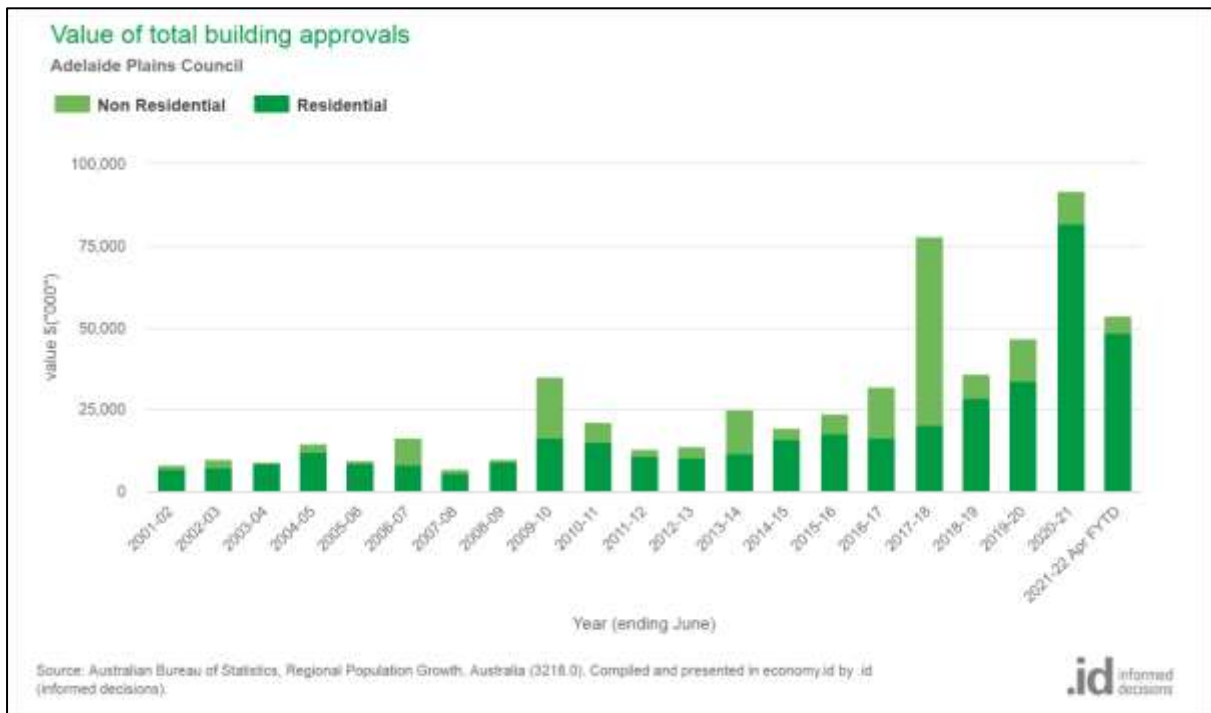
Value has typically been between \$10M and \$25M per annum. From 2016-17, value began to increase to around \$30M.

The \$75M of 2017-18 is possibly associated with capital works of Eden and Liberty subdivisions, and the new school (Xavier).

The subsequent value around \$40M - \$50M and \$92M in May 2021 is likely attributable to the larger numbers of house approvals.

Since the Foodbowl Development Plan Amendment of 2018, around \$9M/annum larger scale agribusiness development has occurred.

Value of approvals in Adelaide Plains has mirrored recent growth in building approvals. Increases in number and value of building approvals can also be seen in growth in rate revenue.



Jobs Growth/Employment

Within increased growth comes the requirement for a regional economy to provide additional employment in the local area or face capital being spent outside the regional as well as associated higher impacts on transport infrastructure and carbon emissions as employees travel to employment outside the region.

Main sectors of employment for residents of Adelaide Plains are:

- Agriculture, Forestry and Fishing
- Manufacturing
- Construction
- Retail Trade
- Transport, Postal and Warehousing
- Health Care and Social Assistance.

From 2016 to 2021, changes in industry sectors of employment have been pronounced in:

- Construction
- Administrative and Support Services
- Education and Training
- Health Care and Social Assistance
- Other Services.

As a % of SA jobs, Adelaide Plains local jobs have increased from 0.19% in 2006 to 0.35% in 2021. More residents are working in construction, administration, education, health care and other services.

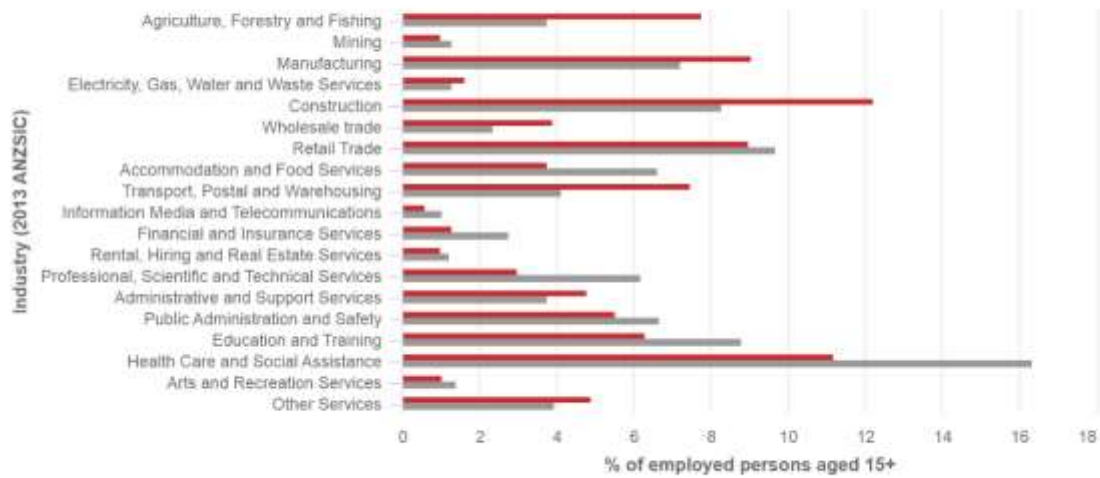
Local jobs						reset	export
	Adelaide Plains Council		South Australia		Adelaide Plains Council as a % of South Australia		
Year (ending June 30)	Number	%change	Number	%change			
2021	2,987	+7.74	854,282	+0.89	0.35		
2020	2,756	+4.34	846,660	-0.07	0.33		
2019	2,636	+19.45	847,230	+1.33	0.31		
2018	2,124	+6.72	835,928	+2.13	0.25		
2017	1,981	-6.11	818,141	+1.34	0.24		
2016	2,102	--	807,208	--	0.26		
2011	1,708	--	804,301	--	0.21		
2006	1,395	--	742,876	--	0.19		

Source: Australian Bureau of Statistics. Australian National Accounts: National Income, Expenditure and Product, catalogue number 5206.0, and the National Institute of Economic and Industry Research (NIEIR) ©2019. Compiled and presented in economy.id by .id (informed decisions)
Please refer to specific data notes for more information

Industry sector of employment, 2021

Total employed persons

Adelaide Plains Council area South Australia

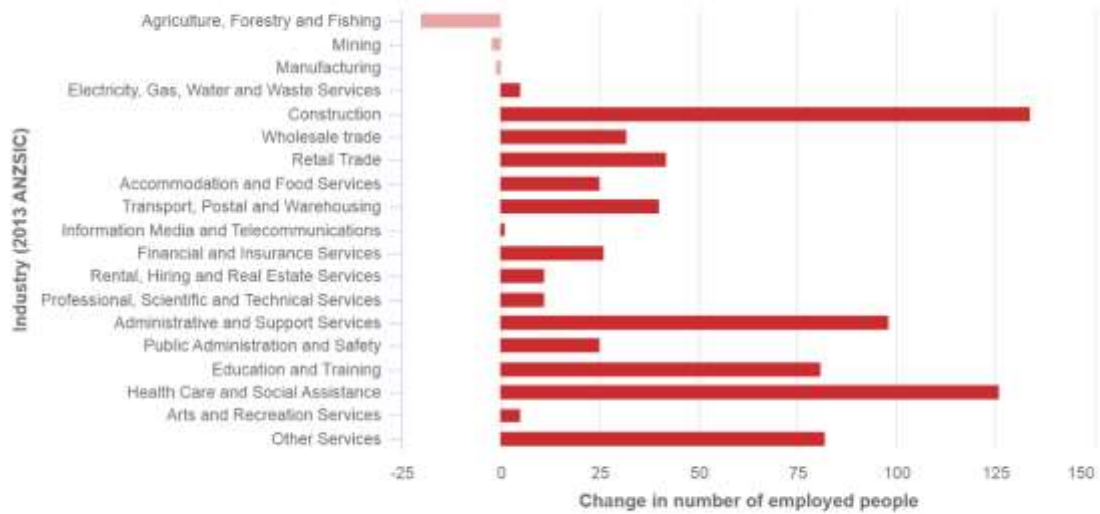


Source: Australian Bureau of Statistics, Census of Population and Housing, 2021 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

.id informed decisions

Change in industry sector of employment, 2016 to 2021

Adelaide Plains Council area - Total employed persons



Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 and 2021 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

.id informed decisions

Current and Emerging Community Profile

In 2021, Adelaide Plains Council area had higher proportion of children (under 18) and a lower proportion of persons aged 60 or older than Greater Adelaide.

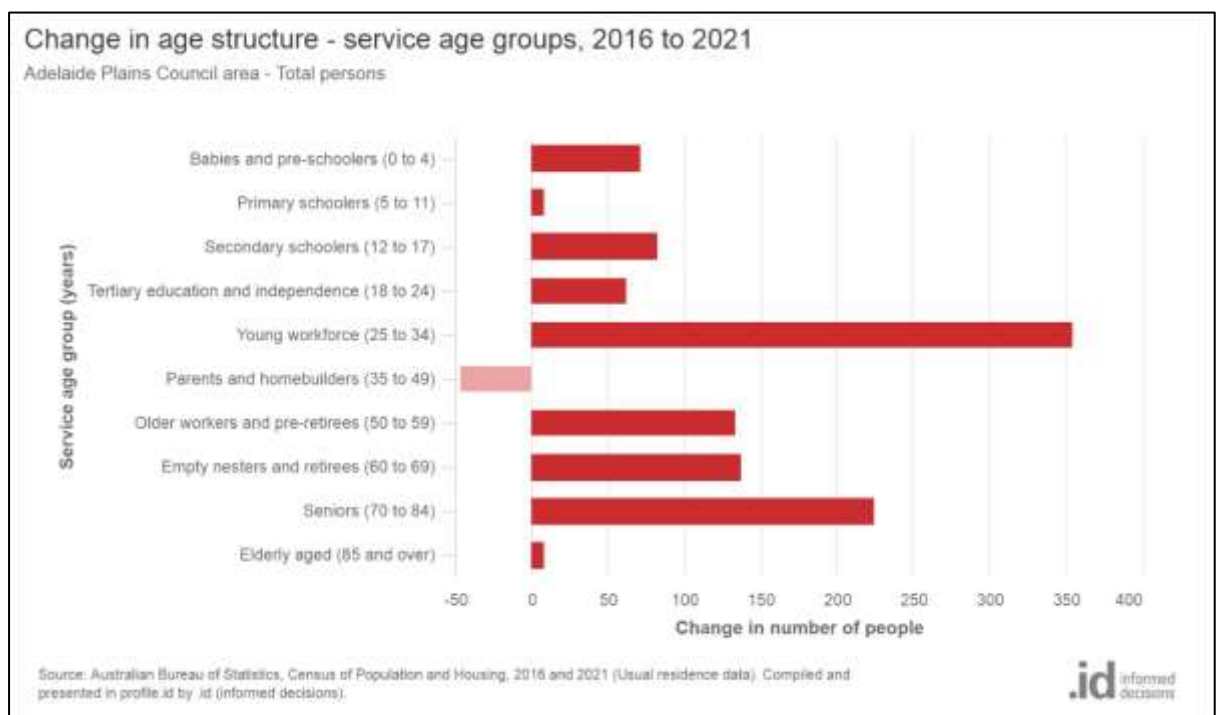
In 2021, the largest age group was 55 to 59 year olds. The group that changed the most since 2016 was 25 to 34 year-olds, increasing by 355 people.

The largest changes in age structure between 2016 and 2021 were in the age groups:

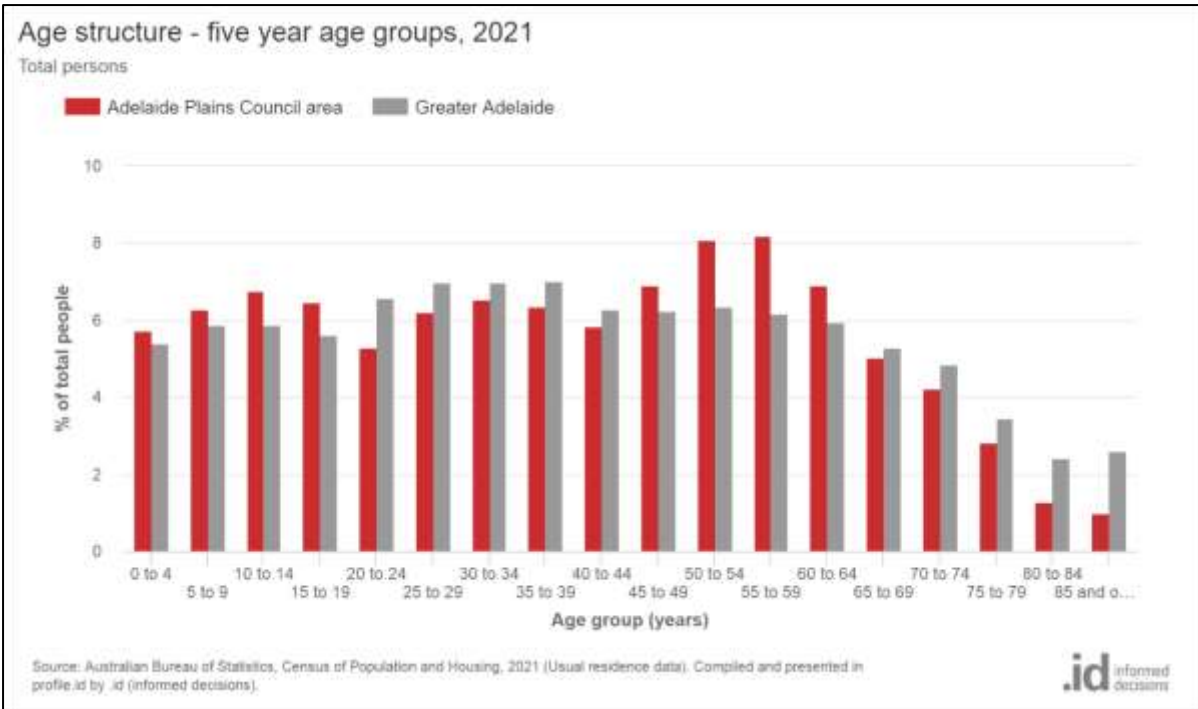
- 25 to 34 (+355 persons)
- 70 to 84 (+225 persons)

The major differences between Adelaide Plains and Greater Adelaide were:

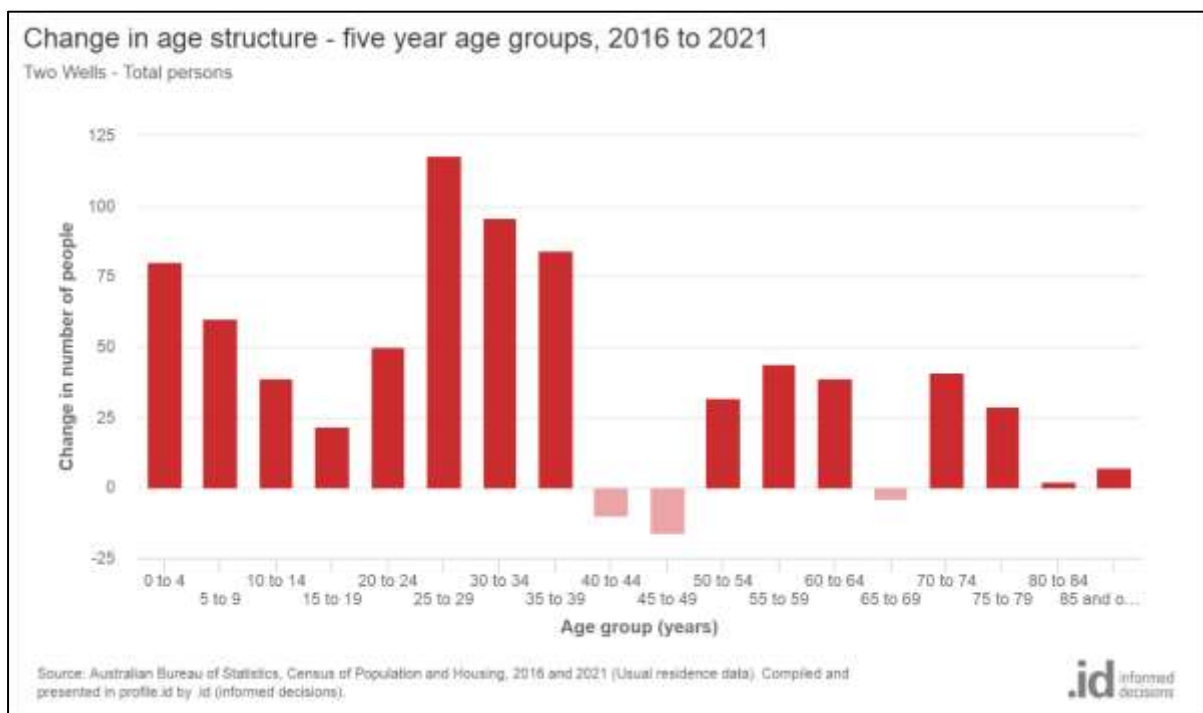
- A larger percentage of 'Older workers & pre-retirees' (16.3% compared to 12.6%)
- A larger percentage of 'Secondary schoolers' (8.3% compared to 6.9%)
- A smaller percentage of 'Seniors' (8.4% compared to 10.7%)
- A smaller percentage of 'Frail aged' (1.0% compared to 2.6%)



Adelaide Plains experienced growth in younger and family rearing ages as well as what can be called empty nesters (2016-2021)



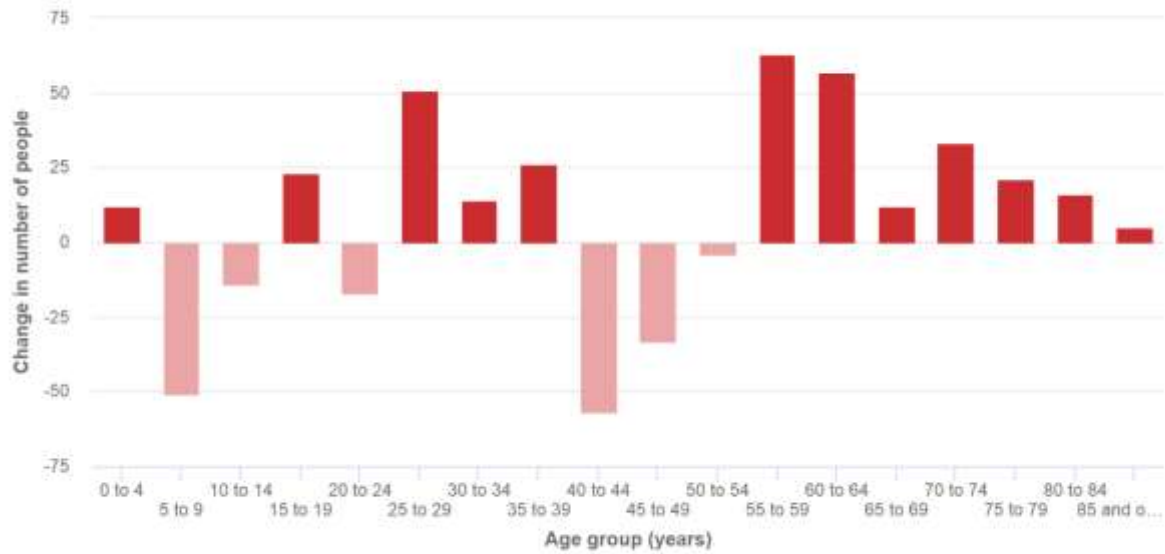
Compared to Greater Adelaide, Adelaide Plains has higher proportion of children, youth and empty nesters, and lower proportion of family rearing age, and retirees (2016-2021)



Two Wells from 2016 – 2021 has experienced growth in children, young adults, family rearing age, empty nesters and older retirees.

Change in age structure - five year age groups, 2016 to 2021

Lewiston - Total persons



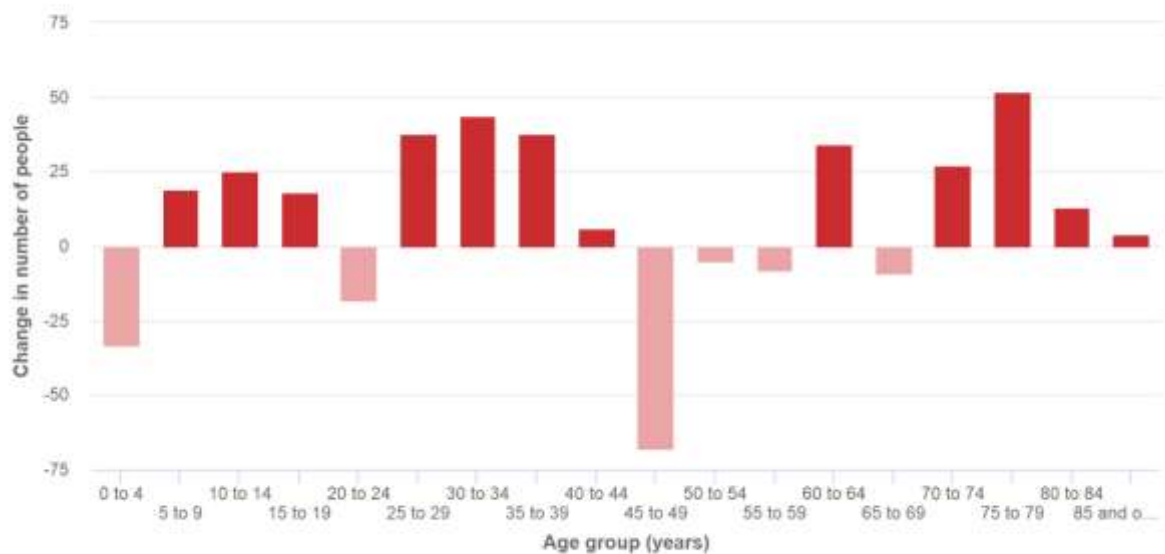
Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 and 2021 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

.id informed decisions

Lewiston from 2016 – 2021 has experienced growth in family rearing age, empty nesters and retirees, and a decline in children and mature family age

Change in age structure - five year age groups, 2016 to 2021

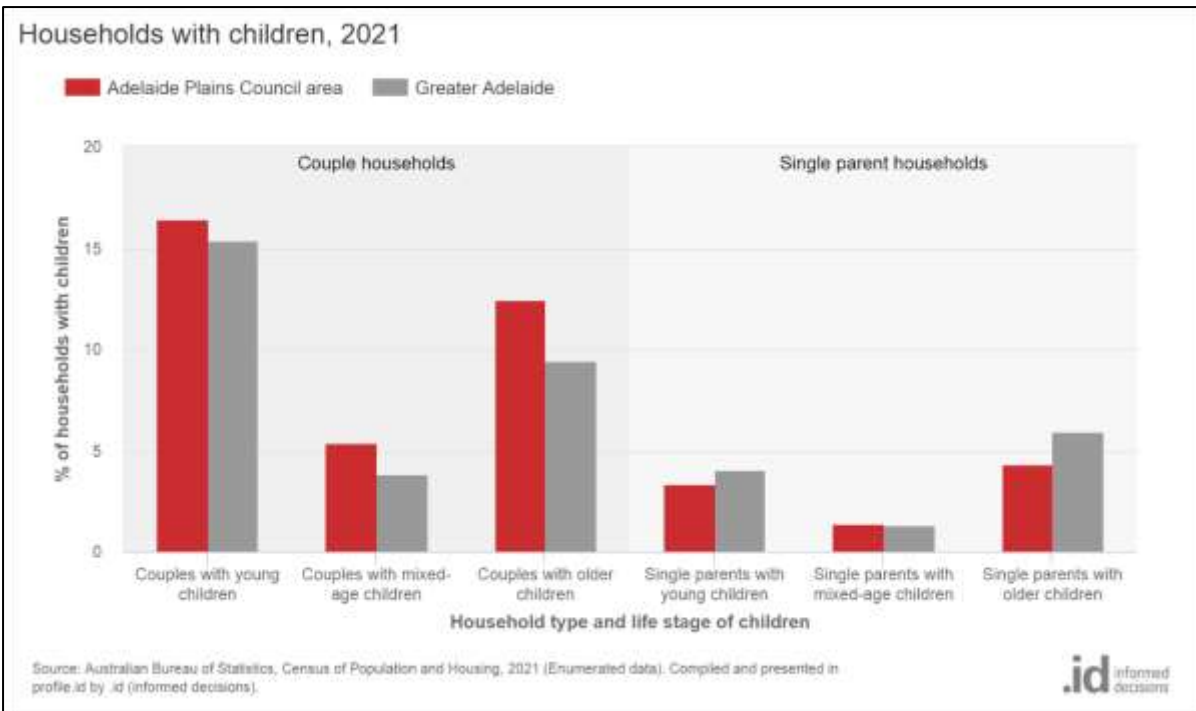
Mallala - Rural Remainder - Total persons



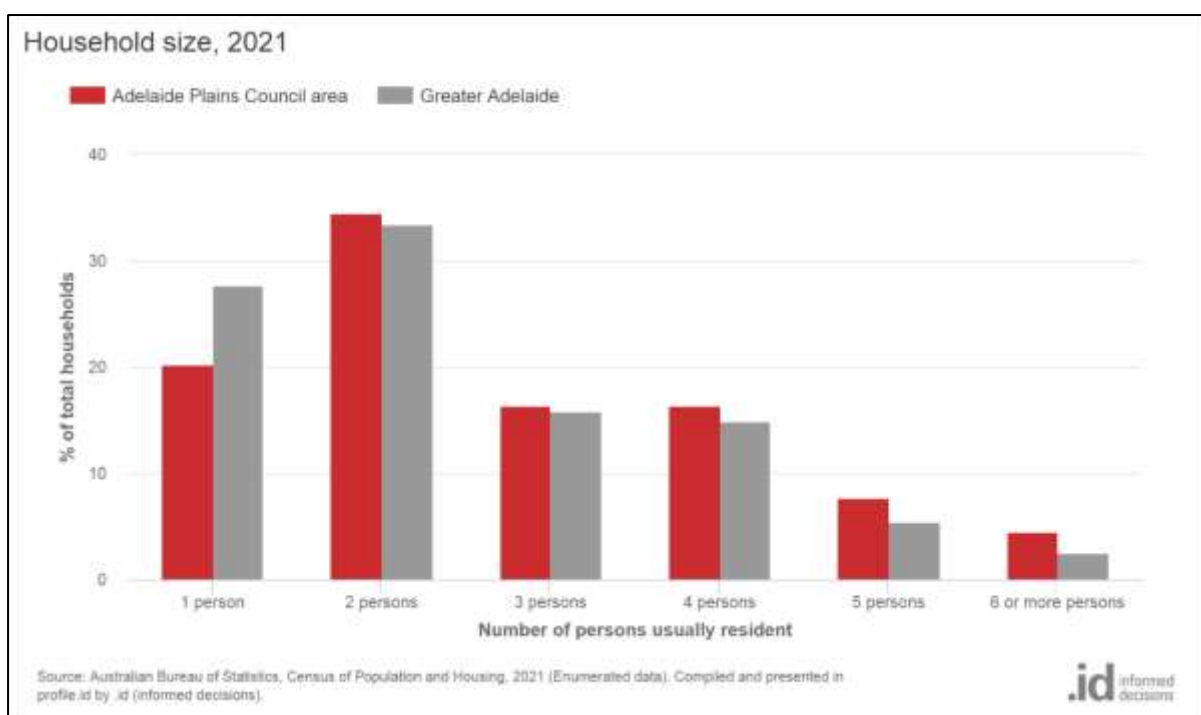
Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 and 2021 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

.id informed decisions

Mallala – Rural Remainder from 2016 – 2021 has experienced growth in children, family rearing age, older retirees, and decline in young children, young adults and mature families



Compared to Greater Adelaide, Adelaide Plains has higher proportions of couples with children



Compared to Greater Adelaide, Adelaide Plains has a lower proportions of single person households

Between 2016 and 2021, the LGA with the highest net migration to Adelaide Plains Council area (+383) was from Salisbury, whilst the highest net loss (-101) was to Gawler.

In 2021 compared to Greater Adelaide, there was a higher proportion of people in the younger age groups (0 to 17 years) and a lower proportion of people in the older age groups (60+ years). Overall, 22.6% of the population was aged between 0 and 17 compared to 20.5% for Greater Adelaide. 21.3% were aged 60 years and over, compared with 24.6% for Greater Adelaide.

Based on available data from the 2021 Census, families are moving to Adelaide Plains Council, in particular Two Wells and to a lesser extent, in Mallala-Rural Remainder. Lewiston and Mallala-Rural Remainder are experiencing ageing.

Adelaide Plains / Greater Adelaide based on ABS

<p>WORK (Unemployment rate) 2021</p> <p>4.2% 5.5%</p>	<p>HOUSEHOLDS (2021)</p> <p>Family</p> <p>62% 54%</p> <p>Lone Person</p> <p>20% 27%</p> <p>Group Households</p> <p>3.2% 3.6%</p>	<p>PEOPLE 0 – 24 years (2016 – 2040)</p> <p>(no data)</p>
<p>CARS No motor vehicle (2021)</p> <p>2% 7.5%</p>	<p>DWELLINGS</p> <p>Separate House</p> <p>97% 73%</p> <p>Medium Density Dwellings</p> <p>0.9% 23%</p>	<p>PEOPLE 25 – 64 years (2016 – 2040)</p> <p>(no data)</p>
<p>INTERNET Internet at Home (2016)</p> <p>76% 80%</p>	<p>POPULATION</p> <p>9977 1.38M</p> <p>People (2021)</p>	<p>LANGUAGE Speak a language other than English at home (2021)</p> <p>5.6% 21.3%</p>
<p>VOLUNTEER Residents who did voluntary work (2021)</p> <p>14.4% 15.5%</p>	<p>POPULATION</p> <p>18500 1.89M</p> <p>Estimated Population (2040)</p> <p>FORECAST GROWTH (% average annual change)</p> <p>3% 1.1%</p>	<p>ECONOMIC Low Income Households (2021)</p> <p>20% 23%</p>
<p>RELATIVE DISADVANTAGE</p> <p>979 989</p>	<p>FORECAST GROWTH (% average annual change)</p> <p>3% 1.1%</p>	<p>Rent <\$304/week (2021)</p> <p>52% 43%</p>

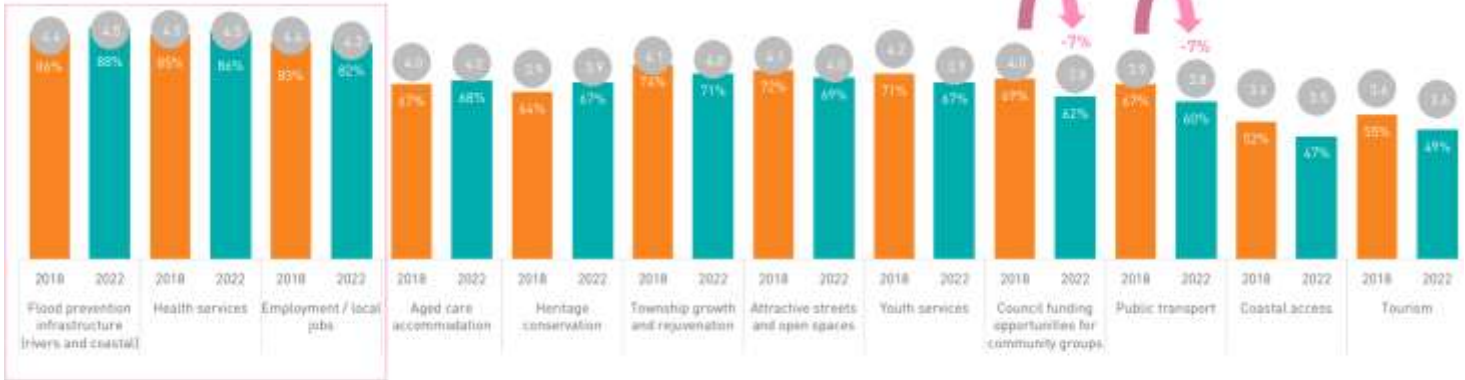
Resident Satisfaction

In line with 2018, Flood prevention, Health services and Employment most important to the community in 2022.

Of less importance in 2022 is Council funding opportunities for community groups and public transport.

2018 to 2022 aggregate importance

■ Important 4-5 ■ mean



ADELAIDE PLAINS COUNCIL | AUGUST 2022

Q20 Using a scale of 1 to 5, where 1 is not at all important and 5 is extremely important, how important are the following social and environmental issues to you in relation to Council's future planning? Base: All respondents (n=308)

RATING LEVEL: Extremely High: 4.5 and above High: 4.0-4.4 45
Moderate: 3.5-3.9 Mixed: 2.5-3.4 Low: 2.4 and below

The 2022 residents survey⁴ affirmed the importance of planning for hazards, for health services, and employment.

A similar survey was underway in 2018.

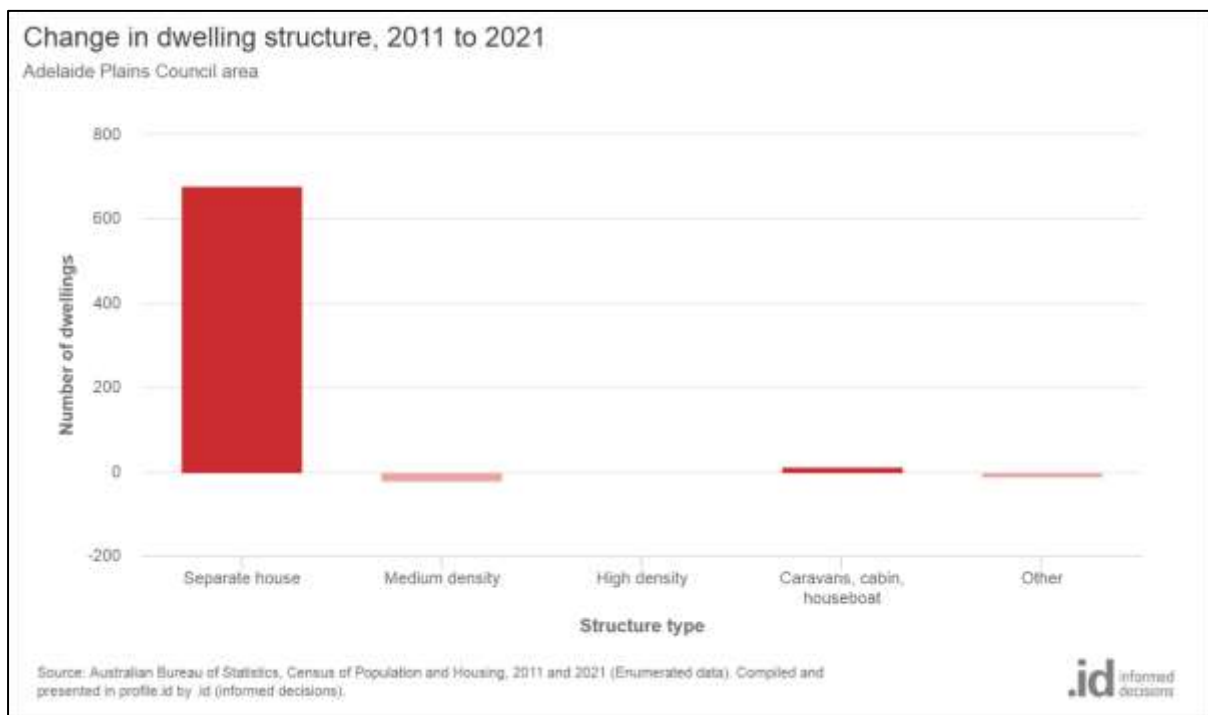
⁴ [PowerPoint Presentation \(apc.sa.gov.au\)](https://www.apc.sa.gov.au)

Housing

The provision of affordable and suitable housing is part of the objectives within the SA Housing Authority's Our Housing Future 2020 – 2030⁵ and is guided through the provisions of the Planning and Design Code from an assessment and approval perspective. Growth planning should consider housing supply and housing choice through providing a mix of housing styles and sizes along with a variety of allotments types from smaller medium density sites to more traditional allotments.

A growing population also has clear implications on requirements for additional housing and services. Council is responsible for rezoning additional land for residential development and is responsible for some of the social and community services along with State and Australian Government service departments.

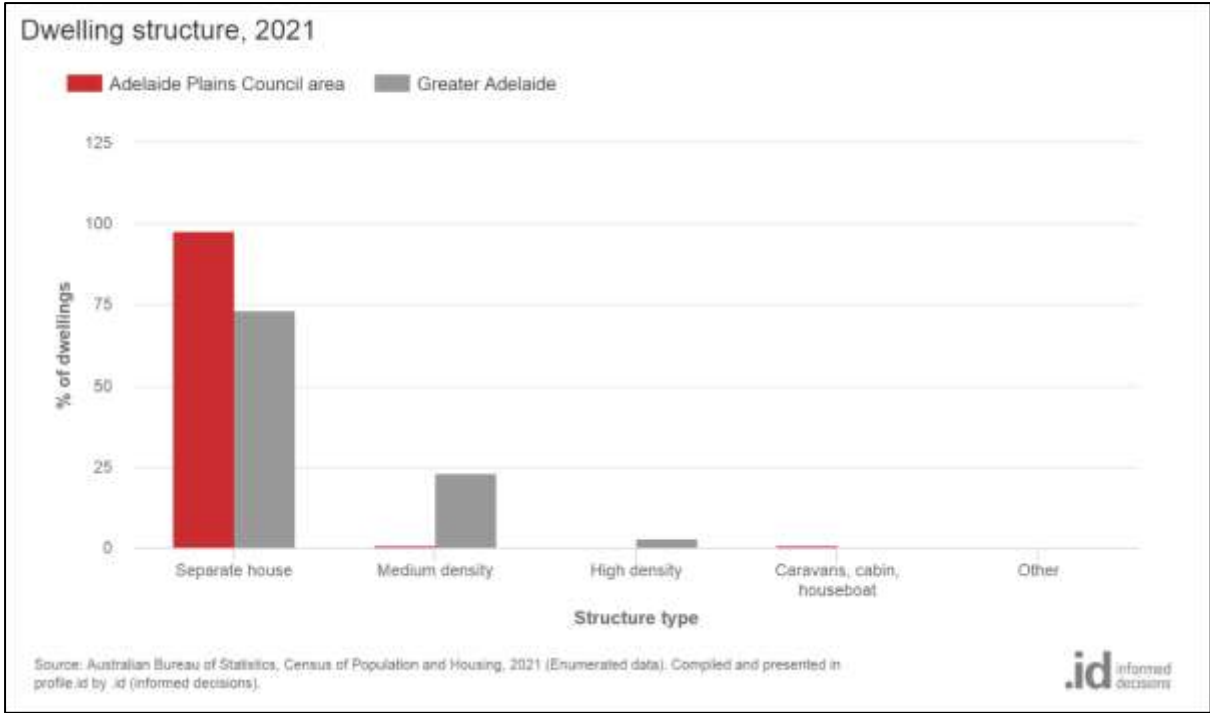
SA Housing Authority has units in Two Wells. A Local Affordable housing plan toolkit⁶ is available.



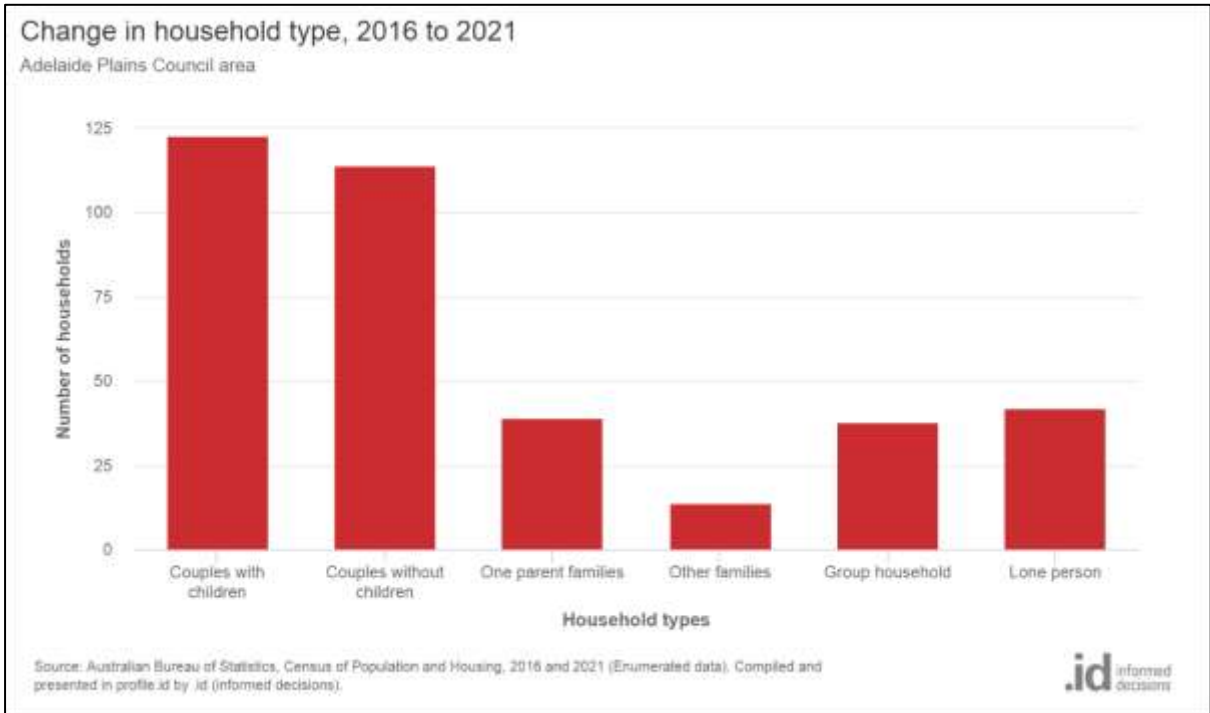
Across Adelaide Plains, from 2011 – 2021, growth in separate houses has been dominant, with a decline in medium density housing

⁵ housing.sa.gov.au/our-housing-future

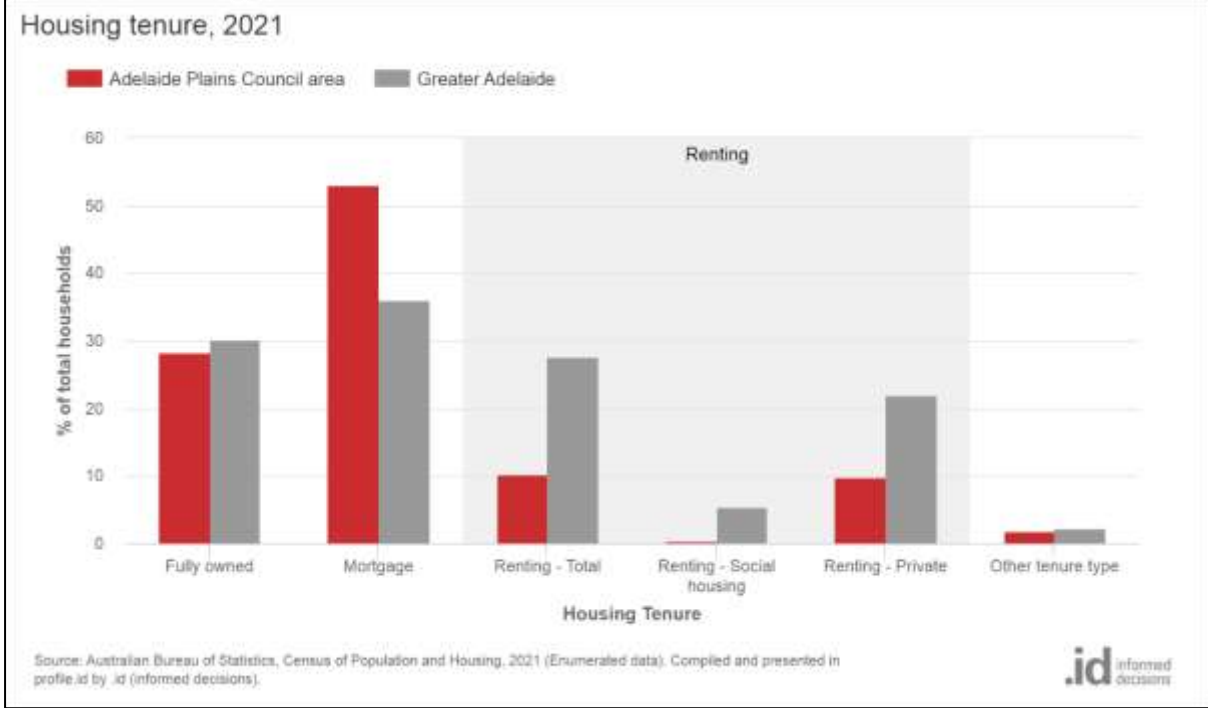
⁶ housing.sa.gov.au/documents/general/Local-Affordable-Housing-Plan-Toolkit.pdf



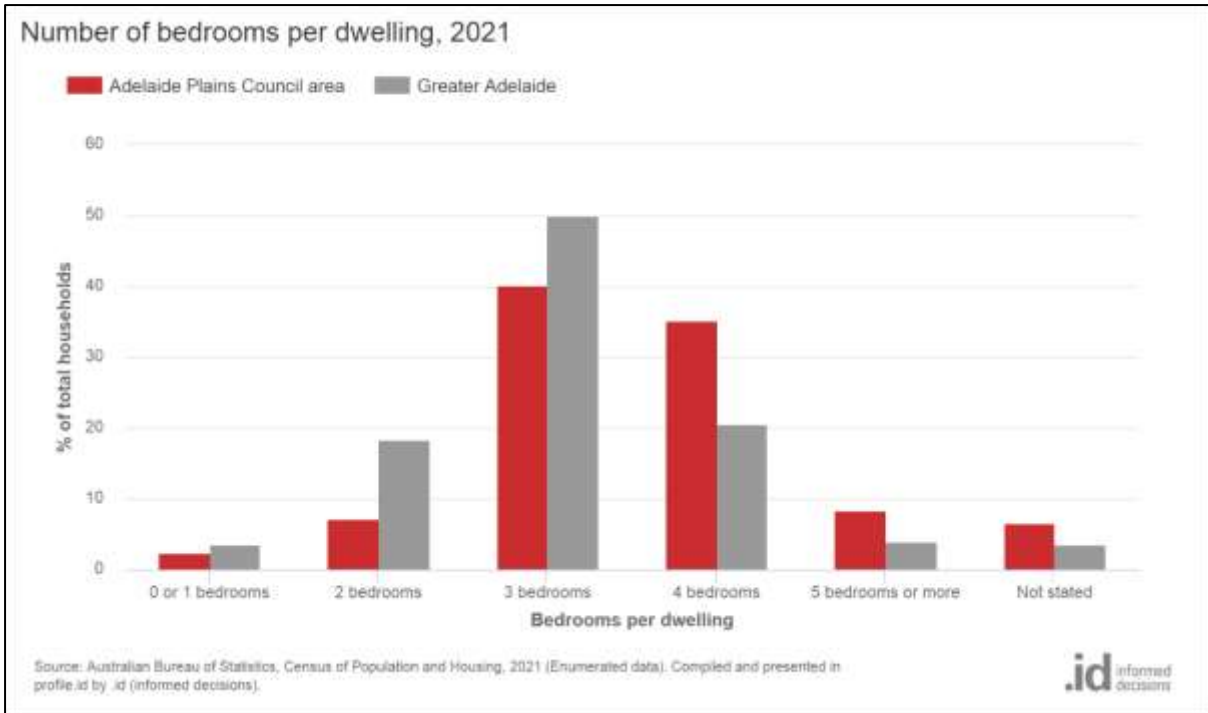
Compared to Greater Adelaide, Adelaide Plains is dominated by separate houses, with negligible other forms of housing.



Across Adelaide Plains, Greatest growth has been in couples, with and without children, with some growth in group and lone person households



In 2021, compared to Greater Adelaide, higher proportions of households had a mortgage, and fewer households rented privately. Adelaide Plains had negligible amounts of social housing.



Compared to Greater Adelaide, Adelaide Plains has lesser proportions of dwellings with 1 – 2 bedrooms, and greater proportions of dwellings with 4 or more bedrooms.

Regarding aged housing, in 2019, Council explored options for funding, operation and management of its existing retirement living portfolio. The intent was to ensure it continues to serve our older community.

Council identified several opportunities to increase the quantity and the quality of retirement living in Mallala and Two Wells.

The aged living review⁷ identified:

- several providers with interest in Adelaide Plains, including regarding land parcels identified for potential development
- The aged review identified a strong preference in Mallala and Two Wells for people to remain in their town as they age (e.g. local people do not want to have to leave Mallala to go to Two Wells and vice versa).

Regarding seasonal workers accommodation, this is important as part of attracting seasonal workers for agribusinesses. The Australian Government program encourages overseas seasonal workers and provides a range of information about legal, wellbeing and housing⁸. Several providers specialise in seasonal housing, be it through regular housing managed and available for seasonal workers or through temporary seasonal workers accommodation.

Amended regulations⁹ now fast track approvals of temporary accommodation for seasonal workers.

Adelaide Plains has limited housing choice for the growing number of lone and couple households or those in need of social housing.

Further work on housing mix and variety is required to plan township communities that provide a variety of housing choice to suit various individuals and groups – including aged and seasonal workers.

⁷ Aged Living Review, Urban and Regional Planning Solutions, 2021

⁸ palmscheme.gov.au/worker-support

⁹

plan.sa.gov.au/news/article/2021/new_regulations_fast_track_temporary_accommodation_for_seasonal_workers

Towns and Settlements

Two Wells

Hickinbotham Developments and Council have been working together since the mid-2000s to realise planned urban growth at Two Wells. This includes:

- 2007 Memorandum of Understanding
- 2012 Infrastructure Deeds
- 2013 Rezoning

In 2013, significant decisions were taken and the Two Wells Residential Development Plan Amendment was gazetted.

At the time, The Planning Minister stated "This DPA will allow for the provision of up to 3,400 new dwellings and up to 9,700 more residents living in Two Wells over the next 20-30 years. The Two Wells township expansion is a \$1.225 billion project creating more than 3,000 regional jobs during the next 20 years, including more than 450 jobs annually in the construction industry. The future needs of the community will be catered for with a new local centre, provision for a school, improved flood protection and an environmentally friendly design. It will also incorporate a community waste water treatment plant that will service the proposed development and internal buffers to protect existing land uses"



New subdivisions are planned to enable around 2,200 new dwellings over the next 10 – 20 years

The numbers in the 2012 Amendment were indicative and dependent on land development layouts, school and open space provision. Given the current and proposed development pattern, it is considered unlikely that Liberty would reach

in excess of 3000 allotments. Based on a Deed¹⁰ of 2012, the Hickinbotham Group have progressed the Eden land division, with the final lot settling in early 2023. The Liberty Estate envisages some 1,900 lots, noting the zoning allows up to around 3,000 lots. Tranche 1 with 354 lots is under development and Tranche 2 with 787 is proposed.

The Eden and Liberty housing estates contain modern housing on allotments of a variety of sizes, significant open spaces for recreation and active lifestyles, and effective stormwater and traffic management, Within the Liberty estate, Xavier College is established.

Council and Hickinbotham Developments will continue established arrangements to lead to the successful delivery of Eden and Liberty.

Two Wells Main Street and Town Centre

Old Port Wakefield Road is the village heart of the historic Two Wells township, housing local services, amenities and historical buildings. With a fast-growing population, Council is seeking to revitalise the 'village heart' of the town, guided by the vision and principles presented in the 2020 Two Wells Main Street Masterplan¹¹.

The 2020 Plan builds on the investigations and engagement captured in the 2011 Master Plan¹², and is underpinned by the 2019 retail study.

After years of planning, in 2022, Council strategic acquired eight hectares of 'Crown Land' for the purposes of delivering commercial, retail and community



¹⁰ Development Deed 7 November 2012 DC Mallala and Hickinbotham Developments

¹¹ apc.sa.gov.au/_data/assets/pdf_file/0033/659760/Two-Wells-Main-Street-Master-Plan.pdf

¹² apc.sa.gov.au/_data/assets/pdf_file/0030/354855/D16-4102-Two-Wells-Urban-Design-Guidelines.pdf

facilities¹³. With the Adelaide Plains' population growing at an unprecedented rate, the purchase of this strategic landholding in the town centre of Two Wells positions our broader region for further substantial economic growth and will provide convenient access to amenities for residents and visitors alike.

The land is bound by the Port Wakefield Highway, Old Port Wakefield Road, Wells Road and Windmill Road with extensive exposure to arterials and the historic main street.

Two Wells Original Township – Large Sites - CWMS - Levee

Two Well's original township is a mix of cottages, dwellings built pre and post the two wars, and from the 1960's onwards. Some 20 large lots are used for non-residential purposes and can be characterised as underdeveloped.

The original township does not have a community wastewater management scheme (CWMS). One consequence is new housing needs site area of 1200sqm or greater to accommodate on site waste treatment. Original residential areas are mostly within a Neighbourhood Zone and partly a Rural Living Zone. Within the Neighbourhood Zone, a variety of small lot housing may be granted planning consent, including dwellings with site areas between 250 and 450 sqm, ancillary accommodation (akin to granny flats) and retirement housing, subject to minimum requirements for on-site treatment. However, until a CWMS is in place, housing sites need to be around 1200sqm.

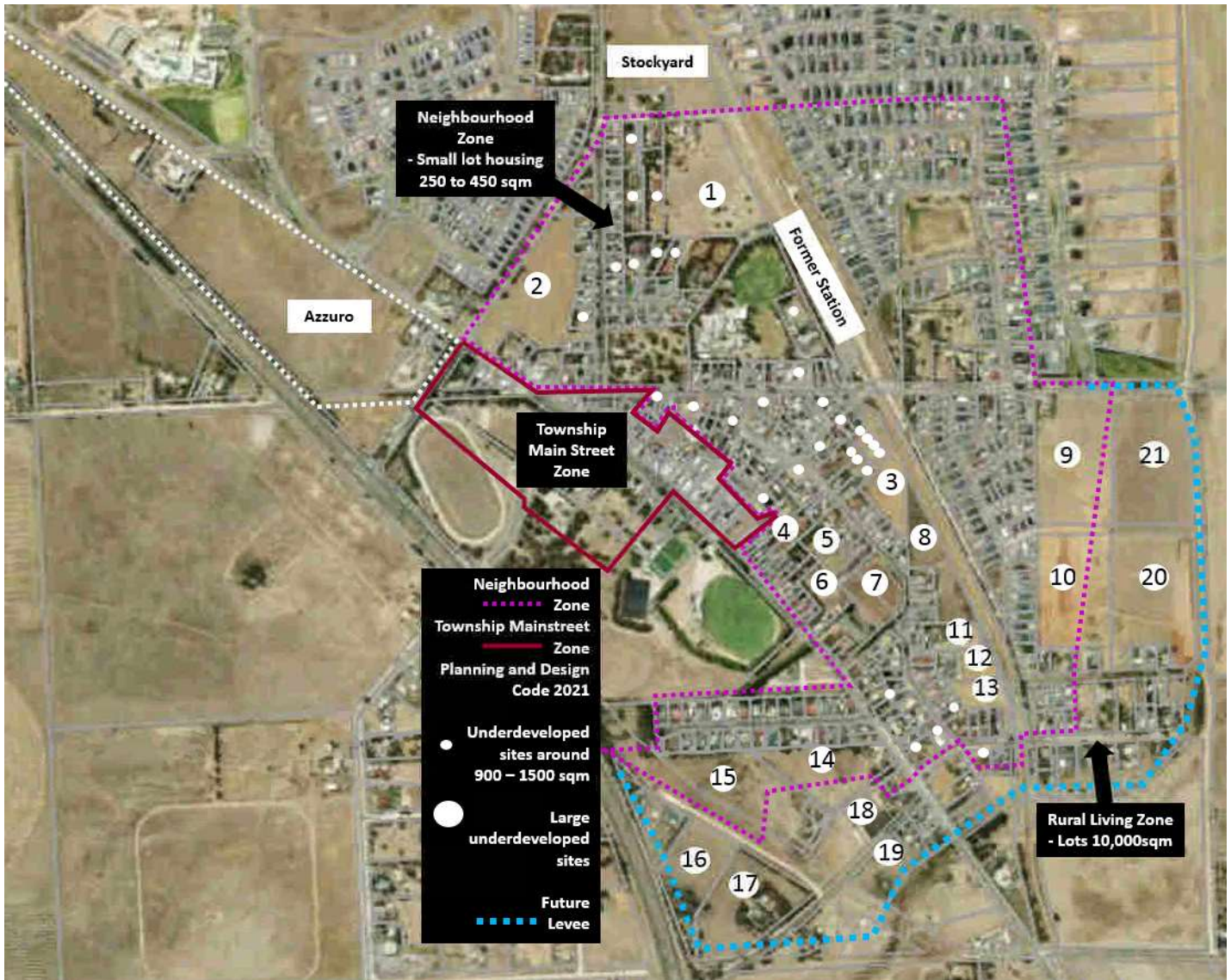
Dwelling Type	Minimum Site Area (sqm)	Minimum Site Frontage (m)
Neighbourhood Zone		
Detached Dwelling	450 ¹	15
Semi-Detached Row Dwellings (minimum of three)	300 ¹	10
Group Dwelling (needs two or more)	350 ¹	20
Residential Flat Building (needs two or more)	250 ¹	20
Ancillary Accommodation (on the same site as another dwelling)	-	-
Retirement Facility Supported Accommodation	-	
Rural Living Zone		
Detached Dwelling	10,000 (1HA)	

¹³ apc.sa.gov.au/our-council/major-projects/two-wells-investment

¹ Minimum 1200sqm is needed to accommodate on site waste treatment

Site Areas and Frontages Anticipated for new Housing in Two Well's Original Residential Areas

Council, SA Water and the LGA are investigating a CWMS. If introduced, new housing would not be constrained to sites of 1200sqm. In parallel, planning for a levee to the east and south is underway. Funding for the levee has been secured.



Potential Development Sites within the Township. Note funded levee location.

Should a CWMS be installed, analysis of development potential has been undertaken. Sites up to around 900sqm already developed with a relatively substantial house are unlikely to offer potential for additional dwellings. Sites of around 800 - 900sqm or greater with a lower value building or vacant offer potential for housing development. There are around 30 sites between 0.1HA and 0.7HA that offer this form of potential for housing development. Initial analysis identifies around 21 large sites developed with few buildings, with non-residential purposes or vacant. The large sites are generally between 0.7HA and 3HA. 15 are

within the Neighbourhood Zone and six within the Rural Living Zone. The 21 large sites and 30 sites together equate to some 52HA.

If 75% of large sites and 25% of small sites developed at 12 dwellings/HA, this would yield around 400 dwellings. If each dwellings has 2.67 residents on average, this is 1100 residents. If developed at 20 dwellings/HA (9 around 400sqm lots on average), this is 1900 residents.

The proposed levee potentially opens up several large sites and numerous smaller sites sited within the area of the proposed levee.

Development sites not included within this analysis include:

- Within the Township Main Street Zone
- Azzurro land of about 15HA within the Employment Zone
- Stockyard Lot, noting a land division is underway
- The former Train Station land under the care and control of ARTC.

Several zone boundaries don't follow title boundaries, e.g. large lots 14 and 15. Commercial land uses on north side of Gawler Road/Old Port Wakefield Road in the Neighbourhood Zone. Consider placing in Town Centre Zone.

On site greening policy will need review considering locations that densify through small lot housing, greening is recognised as critical to improve amenity, reduce heat load, and enable on site water infiltration.

Potential Urban Growth – Hicks Land

Initially supported in principle by Council in 2019, progressing the potential urban growth of the Hicks land is a key urban growth action for Two Wells.



The Hicks land at Two Wells is north of the Eden housing estate, and east of the railway line

During consultation on the growth strategy in 2022, Hicks expressed support for the growth strategy. In order to enable urban development of the Hicks land, the land would need to be rezoned with community engagement, the EFPA lifted through various processes including State Parliament., and suitable infrastructure deeds and suitable access arrangements regarding ARTC/DIT infrastructure in place.

The potential urban development of the Hicks land immediately to the east of Liberty and separated by Mallala Road and the ARTC train line will need to involve the Hickinbotham Group, DIT and ARTC as key stakeholders amongst others.

Temby Road level crossing would not support high traffic volumes or large vehicles given the short set back distance to Mallala Road. Rail activity within the corridor will only increase into the future, not decrease. Therefore, traffic management studies and risk assessments will need to be undertaken given the population forecast for Two Wells will exceed 10,000 by 2040, which is only 18 years away.

ARTC has a policy of no new level crossings, but is open to negotiating a reduction in the number of existing level crossings in exchange for a new or upgraded level crossing. It is likely grade separation (e.g., bridge over rail) may be required to avoid vehicles queuing during train movements and provide the connectivity over the rail corridor to ensure the future developments in Two Wells are not disjointed.

Potential urban development of the Hicks land – including suitable transport arrangements involving movements potentially impacting the train line - needs further investigation.

Along with the Planning and Design Code, Two Wells future is influenced by a possible CWMS for the original township, a levee, and a rezoning.

Small lot housing is potentially facilitated via establishment of a CWMS. This small lot housing is highly walkable to the main street and recreation facilities. Careful siting, design, and on-site greening is important, learning from infill development in metropolitan Adelaide.

If 1100 residents associated with CWMS is added to the two subdivisions, this could lead Two Wells population being 10,000 – 10,500. The proposed levee suggests investigating review of the Rural Living Zoning. Further investigations of the Hicks land are warranted.

Provided economic and market conditions continue favourably to support take up of lots, the Liberty development could be completed in ten to 15 years from now.

Mallala

The township of Mallala had 733 residents in 2016.

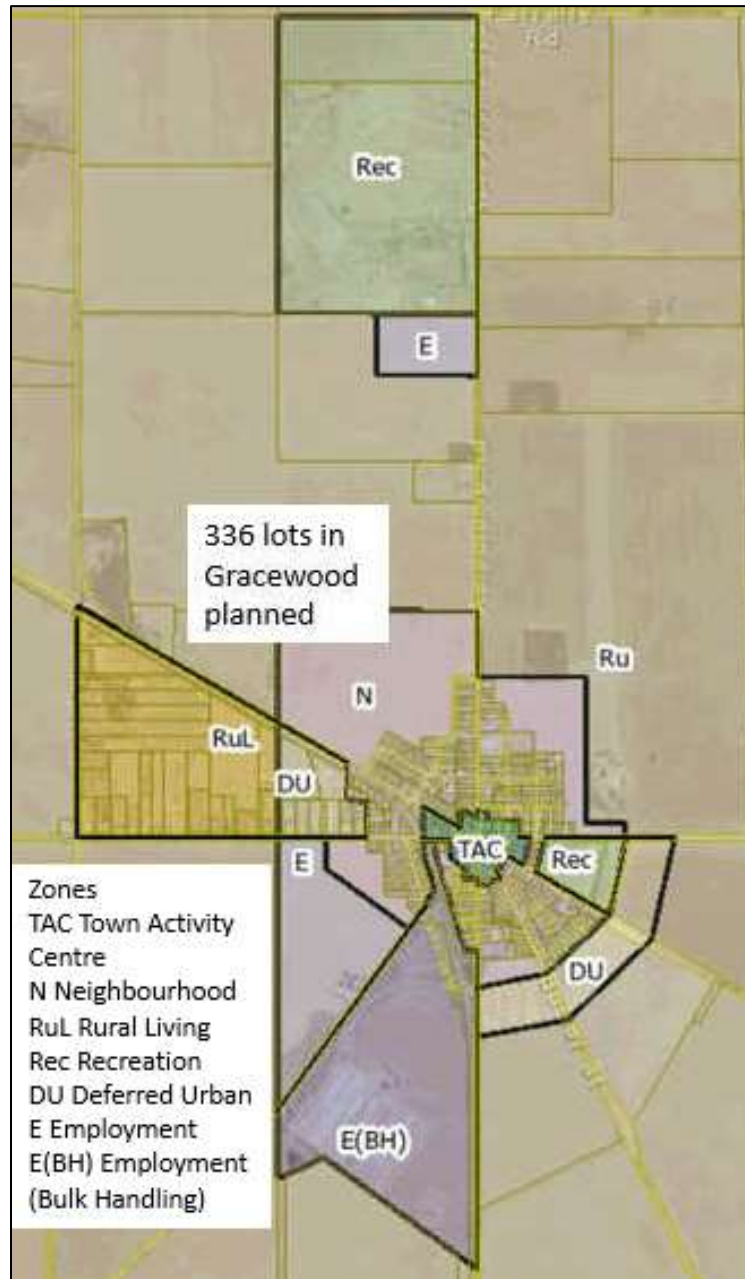
In 2014, the Mallala Township (Transport, Commercial and Minor Residential Zones Boundary Adjustment) Development Plan Amendment was approved. This rezoned 42HA for residential purposes and 22HA as deferred urban.

The Gracewood land division proposes to progressively establish 336 lots over the next 20 years.

336 lots developed at 2.67 residents/dwelling equates to 900 residents. Should this occur, and noting some potential infill within the town, in the long term, Mallala would be around 1600 – 1700 residents.

The first stage of Gracewood was lodged in 2019 but has not yet been approved. Discussions are ongoing.

The Peregrine Group acquired the Mallala Motor Sport Park in 2017.



Mallala planned urban growth envisages a town of 1600 – 1700 residents. Further urban growth will increase demand for services.

Dublin

Dublin and its immediate adjacent agricultural areas had 405 residents in 2021

In response to a request from a private landowner, in 2015, Council proposed to rezone land. The Minister declined to support the rezoning due to other land available around Two Wells, Mallala and in Playford. Dublin was also seen as having limited facilities and low demand for land, with only 27 dwellings being built over the preceding decade.



Council's 2013 Strategic Directions Report contemplated Dublin's expansion.

Figure 5.1 Dublin Township Structure Plan (Source: Strategic Directions Report: Development Plan Review February 2013)



Leinad's submission to the 2022 growth strategy consultation outlines that Leinad control land abutting the south side of Ruskin Road and also land further south and west. Leinad seek to expand Dublin in an orderly, economic and sustainable manner. Expansion southwards will:

- Enable housing to the south of the Park Lands, as originally intended in the towns plan
- Strengthen and define the town centre and Parklands
- Enable reinstatement of the original rectilinear form of the Park Lands to the south of the town
- Bolster the country town lifestyle, act as a commuter settlement, and a gateway to coastal settlements.
- Underpin additional services and retail, and local jobs

Leinad support the Growth Strategy and seek to work cooperatively with Council.

Gurung and Wait made a submission to the 2022 growth strategy consultation. Their submissions suggested to rezone some existing Rural Living lots and expand the Rural Living Zone further west.

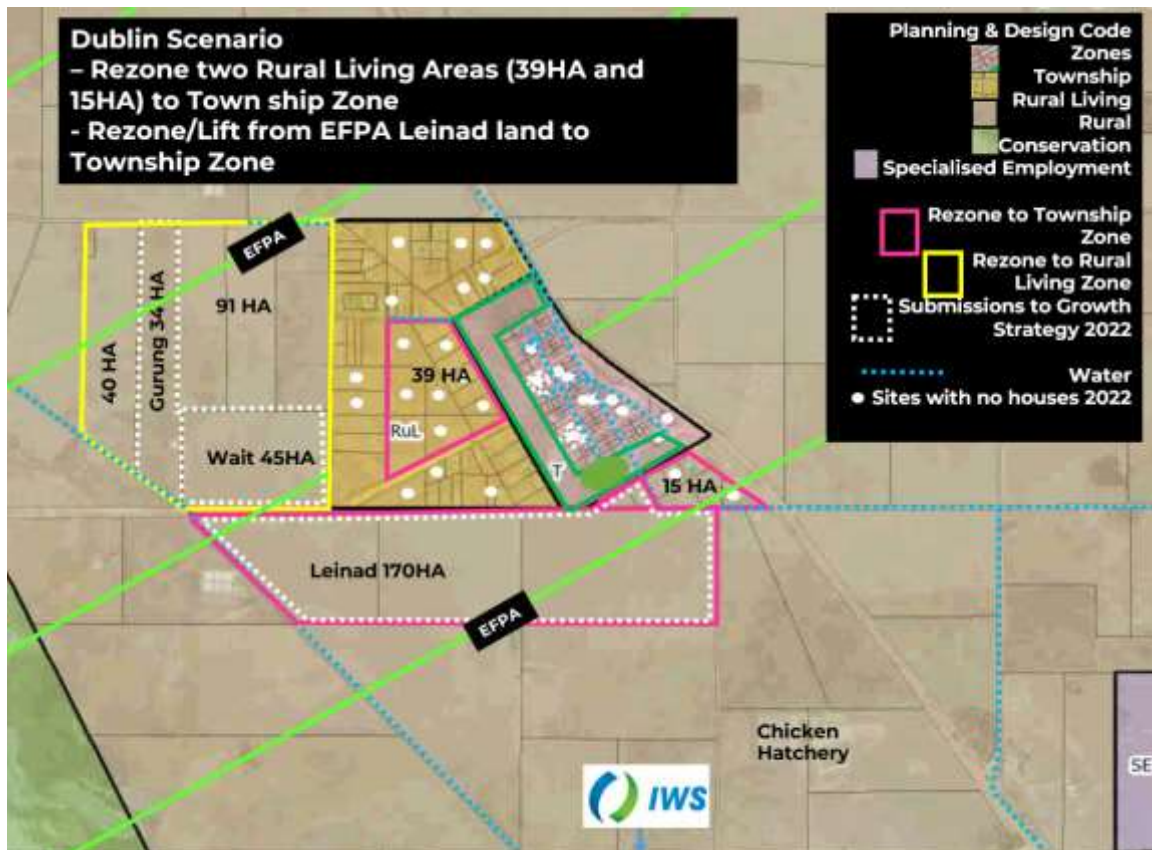
Under the scenario proposed in submissions by Leinad, Gurung and Wait:

- If the Leinad Land and Township Zoned former Rural Living lots are all developed at 6 dwellings/hectare, with 2.65 residents/dwelling, this yields potentially 3,500 residents.
- If the agricultural land rezoned to Rural Living is all developed with 1 HA lots, assuming 2.65 residents/dwelling, this yields potentially 500 residents.
- Added to Dublin's 405 residents of 2021, in total, Dublin could be in the order of 4,500.
- Accounting for the variability of owners intentions with land, if around 25% of sites are developed (rather than all sites), this entails Dublin could grow by 1000 to around 1400. If undertaken over 20 years to 2041, this rate of growth is 6% per annum, 1% higher than experienced at Two Wells from 2016 – 2021.
- If a 3% per annum rate of growth is experienced over 20 years to 2041, this is an increase of 345, leading to a total population of 750.

Council's 2015 request to rezone land at Dublin was not supported by the Minister for Planning at the time due to insufficient demand for housing. Various factors have changed including:

- Increasing employment in Adelaide Plains. Jobs in Adelaide Plains increased from 2,102 in 2016 to 2,987 in 2021. This is an increase from 0.26 to 0.35% of all jobs in SA
- northern expressway increasing convenience to metropolitan Adelaide
- increased interest in working from home.

Leinad advise in their submission that the Greater Adelaide Land Supply (2021) flags the need to accommodate an additional 115 dwellings per annum. Leinad also advise that in response to a call for expressions of interest, Leinad have received interest from 24 parties for lots between 1000 and 1800 sqm.



The scenario proposed in submissions by Leinad, Gurung and Wait involve expansion of the township zone to the west and south, and further Rural Living to the west

Council's Business Plan for 2022/23 contains a project to undertake the Dublin Township Growth and Tourism Master Plan. Staff have commenced preparing a Background Paper and informal discussions with local stakeholders about the Dublin District. This acknowledges planning for Dublin's growth needs to be informed by and complement the future of nearby coastal and rural settlements, agricultural areas and the Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara.

For Dublin, further investigations are needed around:

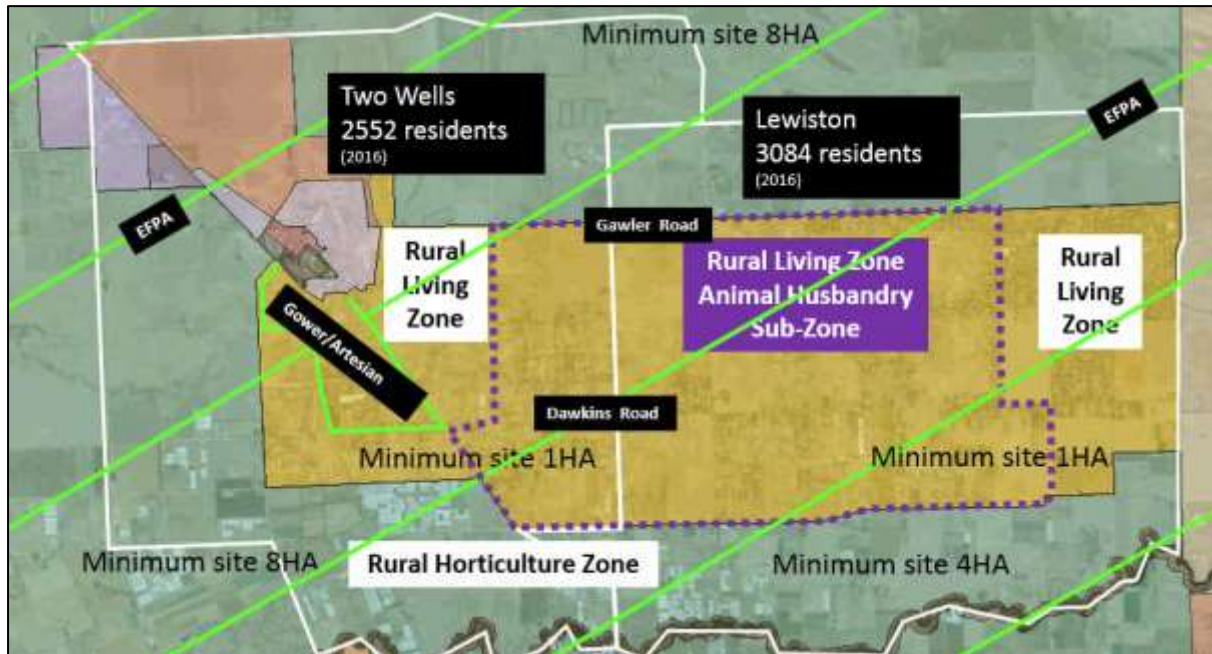
- opportunities to grow tourism and business experiences
- need for land supply release for housing, including rural living as transition to agriculture. Assessment of value of soil for food production and environmentally needs consideration
- potential for conflict with established uses, such as the chicken hatchery and waste facility to the south
- community infrastructure and open space
- hard infrastructure, e.g. sewer and water.

Dublin's future is influenced by its relative proximity to Greater Adelaide arising from the northern connector, employment growth, the Carlslake Road Employment Area, the Adelaide International Bird Sanctuary and a historical rezoning request (see Options for Future Planned Urban Growth).

Lewiston

Lewiston had 3,310 residents in 2021, up from 3,084 in 2016¹⁴.

Lewiston is within the Environment and Food Production Area (EFPA). Recent years has seen a dog park established with the playground intersected by the shared horse trail. This is a focal point within Lewiston.



Two Wells and Lewiston's Rural Living Area is within the Environment and Food Production Area

Planning and Design Code

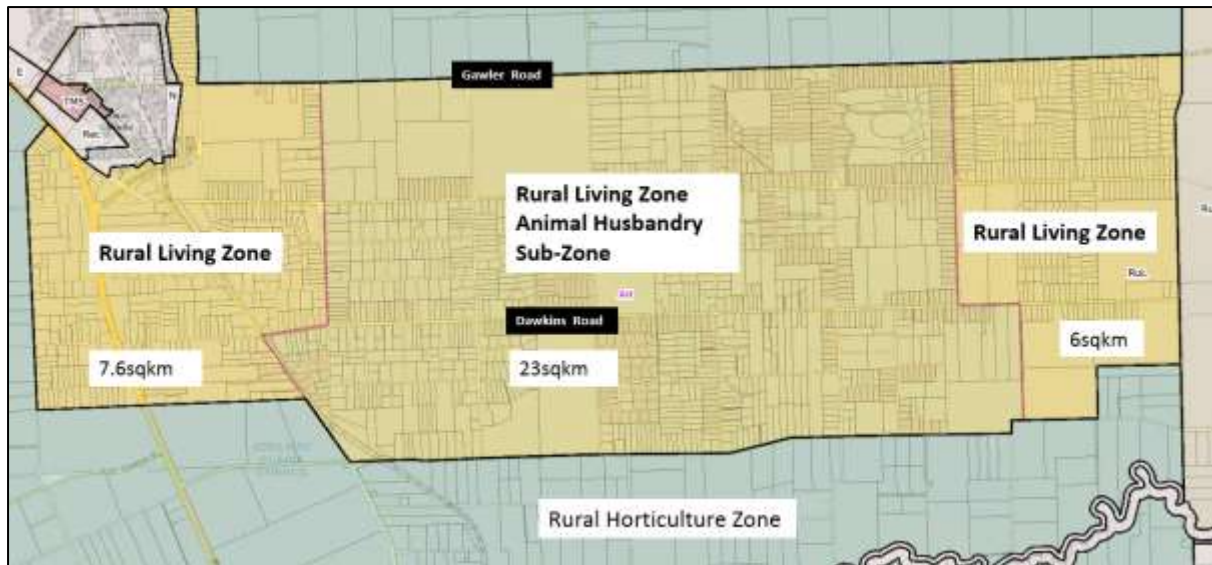
The Planning and Design Code¹⁵ nominates Lewiston for Rural Living, with the central area for Rural Living and Animal Husbandry. The Rural Living Animal Husbandry area has been planned for several decades to be developed for animal husbandry. The Rural Horticulture Zone surrounds Two Wells and Lewiston.

The Planning and Design Code continues this.

The total area of the Rural Living Zone, including the Animal Husbandry Subzone is 36sqkm. As an indicator of size, this is five times the size of Adelaide Airport.

¹⁴ ABS 2016

¹⁵ Planning and Design Code April 2021



Much of Lewiston is zoned for Rural Living purposes, with the central area zoned for Rural Living and Animal Husbandry purposes, and with Horticulture surrounding

The desired outcome of the Rural Living Zone is 'A spacious and secluded residential lifestyle within semi-rural or semi-natural environments, providing opportunities for a range of low-intensity rural activities and home-based business activities that complement that lifestyle choice.'

The Animal Husbandry Sub Zone has a desired outcome of 'Large-scale horse keeping and dog kennelling in association with detached dwellings on large allotments.'

The Planning and Design Code provides for the following:

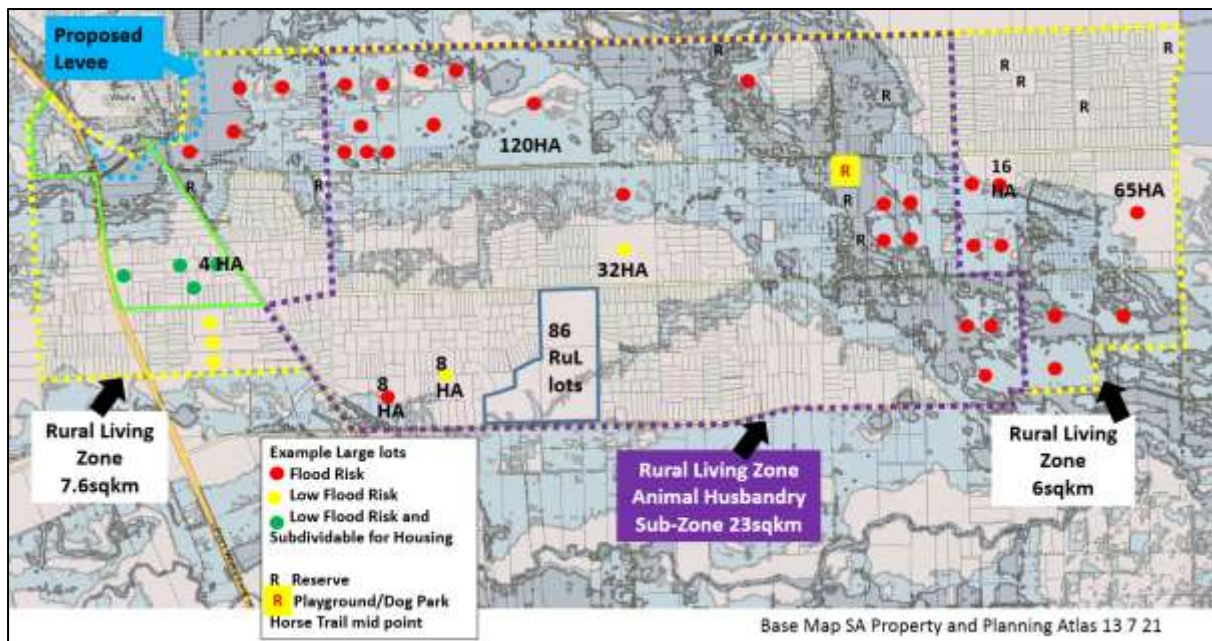
- Minimum site area is 1HA
- Residential development associated with animal keeping, shops up to 50sqm, or with light industry up to 100 sqm
- Division for residential living

Performance assessed

- Ancillary accommodation
- Detached dwelling
- Dwelling
- Group dwellings
- Retirement living
- Tourist accommodation
- Land division

This policy provides for a variety of activities that will continue to drive growth within Lewiston/Two Wells and subsequent population increases and likely demand for services in the future, subject to flood risk and provisions of the Environmental Food Protection Area (EFPA).

Larger Lots and Flood Risk



Two Wells / Lewiston Larger Lots and Flood Risk

The Two Wells / Lewiston Larger Lots and Flood Risk map shows:

- Flood risk impacts about half the area
- The red dots are 32 example large lots (typically larger than 8HA) impacted by flood risk
- The yellow dots are 2 example large lots with low flood risk
- Rural living lots are typically 20 times larger than the average suburban block.
- Remnant larger land holdings are mostly surrounded by 1 hectare land holdings.
- 86 rural living residential lots are being developed. These were lodged prior the EFPA limiting residential subdivision becoming operational in March 2019.

Environment and Food Production Area

The EFPA has been introduced to:

- protect our valuable food producing and rural areas as well as conserving our prized natural landscapes, and tourism and environmental resources
- support our sustainable growth and encourage the building of new homes in our existing urban footprint where supporting infrastructure already exists
- provide more certainty to food and wine producers as well as developers on the direction of future development in metropolitan Adelaide

The EFPA does not allow for the division of land for purely residential purposes.

Council made a submission¹⁶ to the 2021 Review of the EFPA by the State Planning Commission. Council advised it is open to the EFPA continuing in place over Two Wells / Lewiston

¹⁶ Refer full Adelaide Plains Council EFPA submission

Rural Living Zone and Animal Husbandry Subzone, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:

- The barrier of the EFPA limiting subdivision for low intensity residential living where associated with horse or dog keeping being corrected.
- The lack of the EFPA Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.

Recognising the distinct character of Lewiston and the Rural Living Areas of Two Wells, for the purpose of growth planning, these are called a 'settlement'

Lewiston is a mix of established rural living, rural living with associated animal husbandry, a network of reserves and interspersed large parcels in primary production. Factors influencing its future include:

- A variety of horse and dog based activities throughout
- Established rural living throughout
- NAIS water nearby to the south
- Interspersed reserves and the dog park/horse trail midpoint hub
- A shared trail network in the north east
- Sections of trails in the west
- Gawler Road as a more trafficked DIT road
- Flood risk
- Gawler River to the south
- Ongoing urban development nearby in Two Wells and south of Gawler River

Recognising 3084 residents in 2016 and land approved for division but yet to be released to market, Lewiston has potential for around 3,500 residents.

Better understanding these factors as well as the EFPA needs investigating.

Coastal & Rural Settlements

The coastal and rural areas have various settlements, with surrounding areas, with generally less than 200 people. All settlements are constrained by valuable agricultural or conservation land in their ability to accommodate further urban growth. The surrounding land is within the Environment and Food Production Area.

Whilst populations may increase slightly through redevelopment of existing residentially zoned land, the prospects for marked population growth do not exist.

The settlements are part of the social and economic life of Adelaide Plains.

	Coastal and Rural Settlement	Population	
		2016	2021
		Using ABS 'State Suburb' which includes districts around each settlement	
	COASTAL		
1.	Parham	216	185
2.	Webb Beach	47	40
3.	Thompson Beach	201	219
4.	Middle Beach	79	94
	RURAL		
5.	Wild Horse Plains	108	96
6.	Long Plains	68	62
7.	Windsor	170	133
8.	Barabba	117	135
9.	Fischer	62	78
10.	Redbanks	182	185
11.	Lower Light	206	203
	TOTAL	1456	1430
12	Lewiston	3084	3275
	TOTAL with LEWISTON	4540	4705

Whilst limited opportunities for growth exist, the settlements play an important role as part of the social and economic life of Adelaide Plains. Opportunities to augment their futures should be explored.

Economic and Social Facilities

Social Infrastructure and Community Services



Overview of Existing Social Infrastructure and Community Services

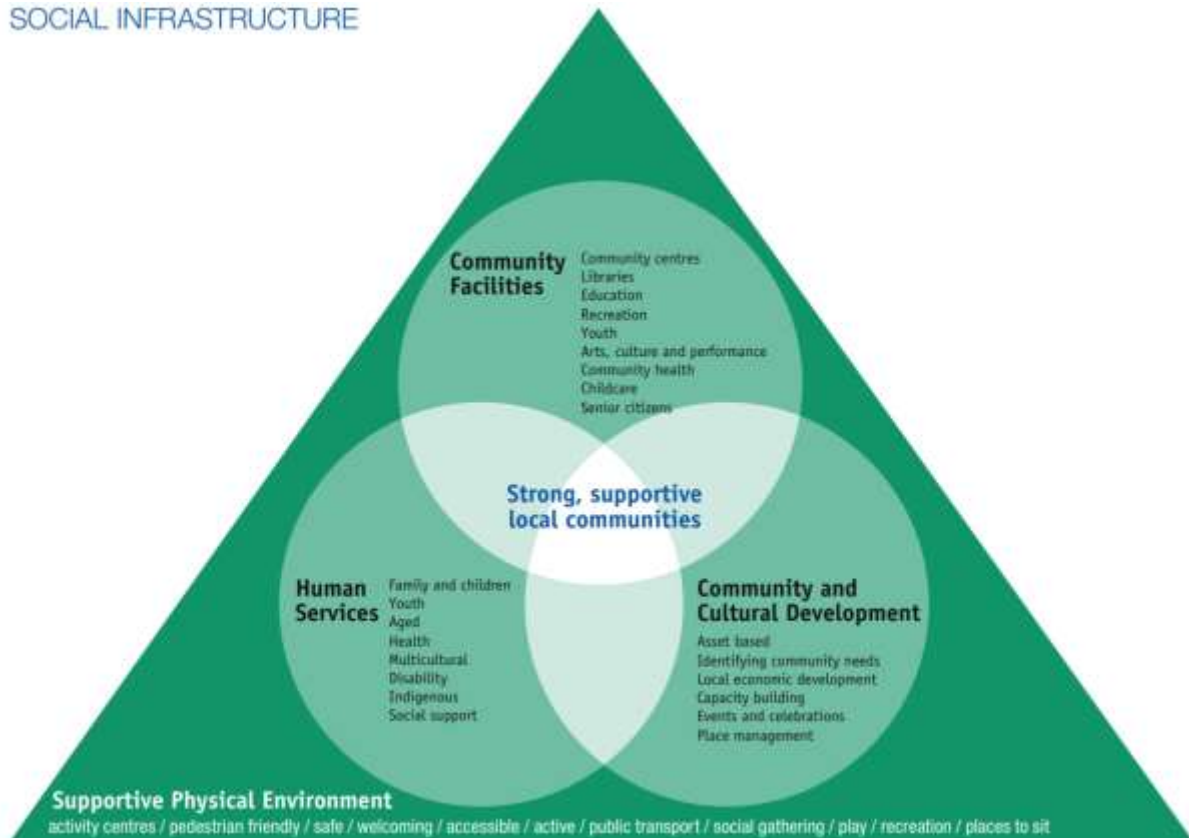
As Adelaide Plains continues to experience urban growth, based on research¹⁷ for the Local Government Association, the following themes are important to contribute to strong and supportive local communities:

- Community diversity
- Sense of community
- Housing choice and affordability
- Access, amenity and lifestyle
- Integration of new and existing communities

Social infrastructure is understood as including community facilities, human services, and community and cultural development.

¹⁷ charlessturt.sa.gov.au/_data/assets/pdf_file/0022/160276/Planning-Social-Infrastructure-and-Community-Services-for-Urban-Growth-Areas-February-2012.pdf

SOCIAL INFRASTRUCTURE



Social Infrastructure Includes Facilities, Services and Community and Cultural Development

Adelaide Plain's townships and settlements level of social infrastructure reflect the agricultural and coastal based communities and their strengths. This is illustrated in the initial application of the townships and settlements to the social infrastructure hierarchy (see table).

Identifying future social infrastructure should have regard to:

1. The specific growth context of Adelaide Plains informing a social infrastructure hierarchy
2. Understanding existing capacity in social infrastructure, as well as gaps and inefficiencies. Community engagement is essential to inform this.
3. Comparative studies to understand what kind of facilities of what size have worked in similar urban growth areas.
4. Integrating with other planning underway.
5. Funding, delivery, and staging.



The new Xavier College at Two Wells aims to introduce Year 9 in 2023



The new Riverbanks B – 12 School at Angle Vale opened in 2022, immediately to the south east of Lewiston

The draft Regional Public Health Plan¹⁸ identifies the top regional health challenges as:

- Improving mental health and reducing psychological stress (and suicide prevention)
- Access and inclusion (services, transport, digital, disability access)
- Youth engagement and wellbeing
- Supporting an ageing population
- Encouraging healthy lifestyles.

From these challenges, three lighthouse projects are envisaged:



¹⁸ Consultation 2022

Hierarchy Level & Population	Hierarchy Includes	Current APC	Future APC (2041)
		9,500 residents	18,000 residents
Neighbourhood 2 – 3000	Small neighbourhood house and similar buildings that provide space for small meetings, gatherings and activities	Dublin, Parham and Thompsons Beach sports and social clubs are examples of neighbourhood level spaces. Lewiston (3,000) playground/dog park is also an example of a gathering space	Towns will continue to serve wider districts. If Two Wells itself is 15,000, are local neighbourhood spaces needed in Liberty & Town Centre?
Local 5 – 10,000	Community halls or small community centres, public schools, child care centres or kindergartens and access points for a range of services	Two Wells (2500) and Mallala (733) each have Primary School, Kindergarten, Oval/Clubrooms, Council Library and Office. Two Wells has two child care. Mallala none. Two Wells has Community Centre (Hall). Mallala has Institute (Hall). New School at Two Wells. Museum at Mallala.	If Mallala itself grows to around 1600, is a multi-purpose community hub needed? Is something similar needed if rezoning goes ahead at Dublin? If Lewiston grows to 3500, are better developed focal spaces needed? Should a fodder/hardware store with value added local retail be considered?
District 20 – 50,000	District libraries, multipurpose community centres, high schools, community health facilities and facilities and services for particular groups such as young people, older people or people from diverse cultural backgrounds	Several shooting ranges	If Two Wells grows to 10,000, Is a multi-purpose community hub/health facility with services for particular groups needed? Are a wider range of recreation and sport facilities needed?
Sub Regional 100,000+	Major cultural and civic facilities, major recreation and sporting	Motorsport Park	Motorsport Park What might AIBS and the coastline become as

	facilities, tertiary education such as TAFE, health services and higher order entertainment and leisure facilities.		a regional recreation facility? What facilities might the coastal settlements need?
--	---	--	--

During 2022 consultation, the Hickinbotham Group affirmed to not formalise a retail-based centre within the Liberty Estate. This position is based on community and council sentiment to retain the primacy of the historic town centre, and based on experience of low prospect of viability of a satellite retail centre within the existing or potential growth areas. Note the Planning and Design Code does not preclude retail development.

Council is to undertake a community infrastructure study over 2023 and 2024. That study needs to be completed to determine whether some form of neighbourhood space should be sought to be established in the northern part of Two Wells. If to be established, such spaces are generally better collocated with open space.

Acknowledging the barrier of the train line/Mallala Road between the 5000 residents to be at Liberty and potential urban development of Hicks land, the Hicks land offers some potential for a local centre, as well as local open spaces for recreation and sport.

Adelaide Plain's townships and settlements existing level of social infrastructure reflect the agricultural and coastal based communities and their strengths.

As growth continues – including planned urban growth - further investigations and engagement are needed to identify particular social infrastructure needs, noting the particular Regional Public Health challenges. This is particularly but not exclusively the case for Two Wells.

Council's role is investigating and engaging about needs, and in some case, direct social infrastructure and services provision (e.g. library, ovals, parks, walking and cycling facilities), and in other cases, facilitating and advocating about needs with others (e.g. transport, public transport, education, aged care).

Recreation and Sport Trends



Popular Recreational and Sport Activities¹⁹

¹⁹ orsr.sa.gov.au/_data/assets/pdf_file/0012/31215/Game-On-Booklet.pdf

Two Wells Recreation and Sport Infrastructure

For Two Wells, the 2016 Open Space Study²⁰ found:

'Potential to expand the existing sports ground to a higher level sportsground to support activities and events for the surrounding region (including the growth area of Buckland Park and Lewiston community).

There will be a need for additional recreation open space to cater for the local needs of the growth area. Additional sporting open space could also be required.

There is good community capacity for participation in activities.

There will also be a requirement for additional sporting open space linked to the existing sportsground to cater for the sports needs of the additional population.'

Given that Lewiston does not have sporting facilities, the potential requirements in Two Wells should also aim to cater for Lewiston. The Two Wells future population plus the Lewiston population in the future could be around 14,000 people. Based on this figure and using the PLA benchmarks, there would be justification for three sports areas or one large sports area and one smaller sports area with the provision of:

- 3 Australian rules ovals
- 2 cricket pitches
- 3 soccer pitches
- 1 x 8 tennis court tennis facility
- 4 netball courts'

Specific Recommendations for Two Wells Oval were:

- Consolidate courts and concentrate activities nearer to clubrooms and oval.
- Review and improve traffic conflicts, circulation and car parking (formalise vehicle circulation, better connect parking).
- Provide additional opportunities for sport competitions and training (e.g. soccer, softball or hockey if there is demand).
- Increase play provision and locate closer to oval and clubrooms.
- Manage and limit pedestrian/vehicle conflicts (match days).
- Increase training areas.
- Remove and redevelop BMX (demand for skate park).
- Explore parking opportunities for RV and campervans (showers, toilet and dump point – charge for services).
- Relocate and improve public toilets.
- Increased landscape planting to oval to provide amenity and shelter (wind break).
- Modify community centre to support new sport and recreation functions.
- Improve lighting to oval and surrounding facilities.
- Manage or restrict dog walking on the oval (faeces).

²⁰ apc.sa.gov.au/_data/assets/pdf_file/0030/356493/D16-15679-FINAL-Open-Space-Plan-Background-Report-September-2016.pdf

- Maintain emergency services access (safe area or muster point).
- Address drainage issues across the site.

A Development Deed was agreed between Hickinbotham Developments and the then District Council of Mallala in 2012. The Deed involved the land that is the Eden and Liberty residential areas.

The Deed envisages the provision of

- One playing field that can be used for Australian Rules Football in the winter season and cricket in the summer season. To be provided at or before occupation of 1500 dwellings
- One soccer pitch. To be provided at or before occupation of 2100 dwellings
- Two courts that can each be used for tennis in the summer season and netball in the winter season. To be provided at or before occupation of 1500 dwellings
- Seven playgrounds being provided, one each at the occupation of 500, 1000, 1500, 2000, 2500, 3000, 3500 dwellings

Eden with 265 lots is nearing completion of all 265 lots in 2022. Liberty Tranche 1 involves 364 lots. If 125 dwellings/annum are assumed as being completed in Liberty, 1500 could be reached around 2030.

Two Wells Sport and Recreation Infrastructure		
Need as per 2016 Study	Provision	Comment
3 Australian rules ovals	Two Wells Oval (winter)	Overflow at Two Wells Primary or other facility
	Xavier Oval (winter) (via Deed when 1500 dwellings occupied)	Pending 1500 dwellings <ul style="list-style-type: none"> • Eden 265 • Liberty Tranche 1 - 364 total • Liberty Tranche 2 - 787 total proposed • Liberty Tranche 3 - tbd • TOTAL 1400
	Third Oval (needed)	<ul style="list-style-type: none"> • To west of Two Wells Oval? • In Hicks? • Formally share Primary School?
2 cricket pitches	Two Wells Oval (summer)	Overflow at Two Wells Primary or other facility
	Xavier Oval (summer) (via Deed when 1500 dwellings occupied)	Pending 1500 dwellings <ul style="list-style-type: none"> • Eden 265 • Liberty Tranche 1 - 364 total

		<ul style="list-style-type: none"> • Liberty Tranche 2 - 787 total proposed • Liberty Tranche 3 - tbd • TOTAL 1400 proposed or constructed
3 soccer pitches	Xavier Soccer (via Deed when 2100 dwellings occupied)	Under construction 2021 south of Xavier
1 x 8 tennis court facility	Two Wells Oval has six tennis/four netball Courts	Potential to expand to be the eight tennis court facility pending investigation of demand
	Two Courts are envisaged at Liberty, each able to be used for tennis and netball. (via Deed when 1500 dwellings occupied)	
4 netball courts	Two Wells Oval has six tennis/four netball Courts	
	Two Courts are envisaged at Liberty, each able to be used for tennis and netball. (via Deed when 1500 dwellings occupied)	Should there be other local courts?

The Deed obligates Hickinbotham and now Xavier to consult with Council with respect to the design and construction and arrangements for the shared use (including nature and extent of availability for community use) of 'School Recreation Infrastructure' comprising oval, soccer pitch and two tennis/netball courts.

The 30 Year Plan for Greater Adelaide outlines criteria for what constitutes a healthy neighbourhood. These include:

- Open space within 5 minute/400m walk

Residents with a larger neighbourhood parks within 1600m engage in 150 minutes more recreational walking per week than those with smaller parks²¹.

²¹ healthyactivebydesign.com.au/design-features/public-open-spaces



Small spaces can be designed for multiple sports

Note that indoor recreation centres with 3+ courts typically need a population of 50,000 to support²².

Upgrading recreation and sport facilities, including play spaces, open spaces and trails, should use universal and child safety environs design principles. Water and energy saving initiatives including water harvesting, installation of new or upgrades to existing irrigation infrastructure, connection to existing water infrastructure should form part of upgrading recreation precincts.

The following guidelines are available from ORSR

- Recreation and Sport Facility Design²³
- Recreation and Sport Facility Management Guide²⁴
- How to Plan for a Community Recreation and Sport Hub²⁵
- How to Establish Regional Planning Groups – Guide²⁶
- How to Develop a Regional Recreation and Sport Plan²⁷

More work needs to be done around recreation and sport associated with planned growth, in particular growth at Two Wells and Mallala.

²² Pg 35 in lga.sa.gov.au/_data/assets/pdf_file/0026/469421/Murraylands-and-Riverland-Regional-Sport-and-Recreation-Facilities-Needs-Analysis-Phase-1-Report-171213.pdf

²³ [PowerPoint Presentation \(orsr.sa.gov.au\)](http://orsr.sa.gov.au)

²⁴ [PowerPoint Presentation \(orsr.sa.gov.au\)](http://orsr.sa.gov.au)

²⁵ [PowerPoint Presentation \(orsr.sa.gov.au\)](http://orsr.sa.gov.au)

²⁶ [PowerPoint Presentation \(orsr.sa.gov.au\)](http://orsr.sa.gov.au)

²⁷ [PowerPoint Presentation \(orsr.sa.gov.au\)](http://orsr.sa.gov.au)

Tourism Infrastructure

The signature tourist attractors to Adelaide Plains include the Adelaide International Bird Sanctuary Winaityinaityi Pangkara, Mallala Motor Sport Park, and the Mallala Museum.

Along with these, as an established agricultural area, places valued by residents are also enjoyed by visitors. For example, the Two Wells Bakery, recreating in parks and reserves – be it walking, cycling or horse based - experiencing older buildings, and visiting cemeteries.

Existing camp grounds and camping facilities include the Mallala Camp Ground, Parham Camp Ground and Middle Beach Caravan Park. Submissions to the 2022 consultation suggested considering opportunities for recreation vehicle parks as part of the Two Wells main street and oval precinct, and Two Wells to be a RV friendly town.

In 2019 South Australia visitation²⁸ to caravan parks grew by 19% and night's growth was 31% to surpass 1.3M trips and 5.5M nights, both the highest since records of visitation have been kept. This shows a strong trend in demand for caravan and camping sites in SA.

Key themes in Council's Tourism and Economic Development Strategy are:

- Coast
- Main Streets and Townships
- Primary Industries and Food
- Business Support and Growth.
- Population, Infrastructure and Employment.



The Adelaide International Bird Sanctuary, Mallala Motorsport Park, and Mallala Museum are key attractors for visitors to Adelaide Plains

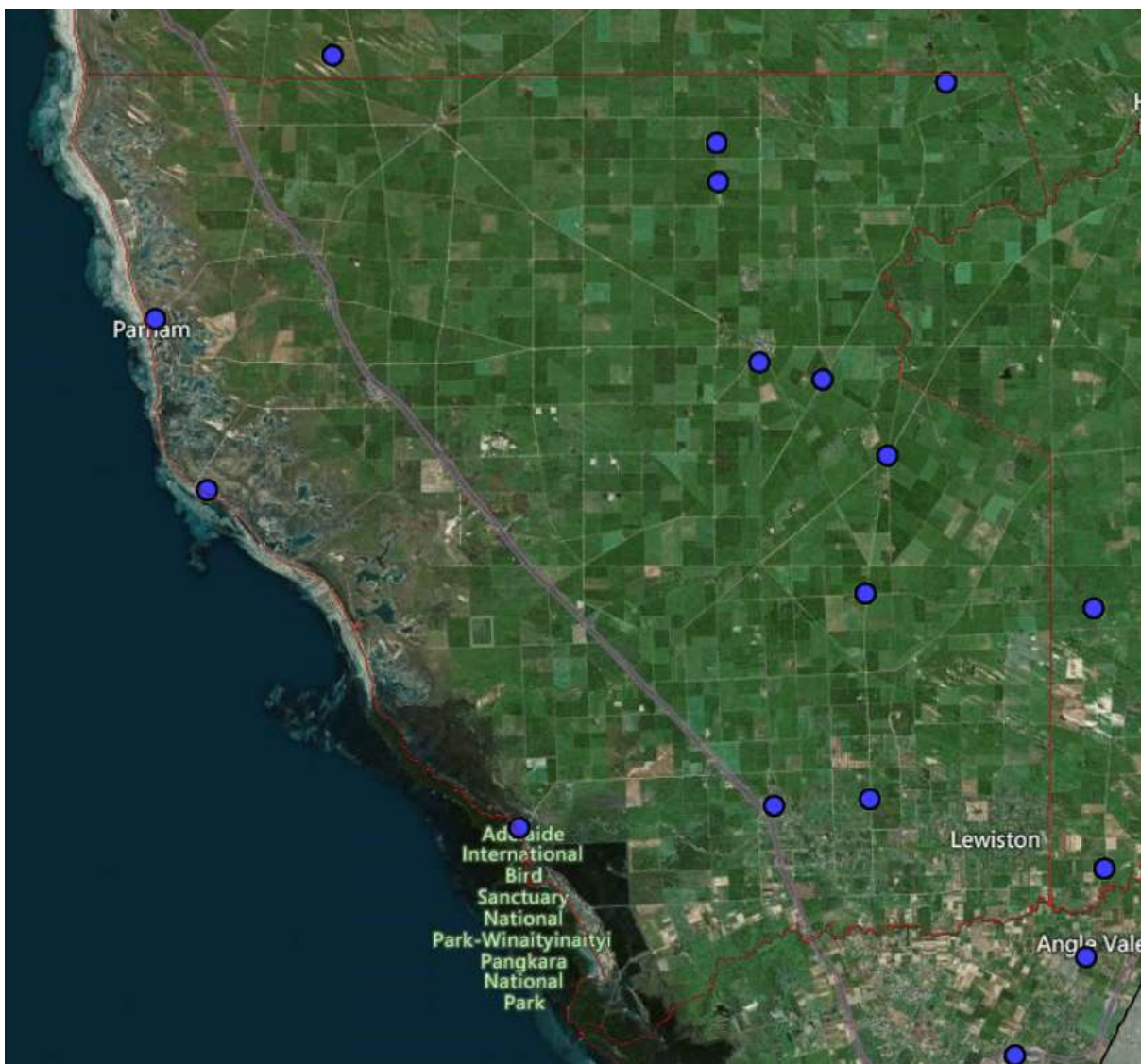
Compared to other regions, Adelaide Plains is less well known for tourism experience. Opportunities to augment visitor experiences should be considered.

²⁸ caravanindustry.com.au/caravanning-and-camping-most-popular-holiday-type-for-australians-in-2019-with-60-million-holiday-nights

Telecommunication Black Spots

Telecommunication services are provided by the private sector operating within Australian Government guidelines.

The Mobile Black Spot Program²⁹ identified gaps with community input until 2018 at which time it closed for nominations. Local communities and councils are encouraged to engage with the mobile network operators and infrastructure providers, as well as state governments, to explore opportunities to improve coverage through Federal and state government initiatives. Experience has shown that when local communities and councils engage with the mobile providers it increases the likelihood of an application being put forward under government funded programs.



Black Spots Identified in 2018

²⁹ infrastructure.gov.au/media-technology-communications/phone/mobile-services-coverage/mobile-black-spot-program/faq

The Peri-Urban Mobile Program (PUMP)³⁰ is a grants program that provides funding to improve mobile connectivity in bushfire priority areas along the edges of Australia's major cities. The program targets long standing mobile coverage and reception issues in the peri-urban fringes of Australia's major cities.



Lewiston, Two Wells and part of Port Wakefield Highway are eligible for funding to improve mobile connectivity under the Per-Urban Mobile Program. A planning application has been lodged for a mobile tower in Lewiston.

With community input, Council can engage with authorities where needed to improve mobile coverage.

³⁰ infrastructure.gov.au/media-technology-communications/phone/mobile-services-coverage/peri-urban-mobile-program

Utilities Infrastructure

Water, sewer, electricity, gas, and communications infrastructure are important for residents and business to plan their future. Solar renewables are establishing, noting Adelaide Plains is part of the SA wide electricity network.

New development, be it housing or business, is responsible for funding connections to utilities infrastructure. However, some infrastructure needs augmenting, and this can be a barrier to growth.

As a rapidly growing local government area, provision of infrastructure is an ongoing challenge. Timing of infrastructure provision, funding and what infrastructure is the responsibility of council, state government or private sector needing to be addressed.

RDA Barossa have priorities³¹ around water systems, energy for industry, high value agriculture, and an international standard equine centre.

The proposed Adelaide Plains/Light Regional Council subsidiary aims to advocating and assist securing infrastructure enhancements. This is for infrastructure that is the direct responsibility of councils as well as that of other agencies.

Sewer for the new housing estates at Two Wells is the responsibility of the private sector. Council operates CWMS at Mallala and Middle Beach. Council is investigating a CWMS for the original township at Two Wells.



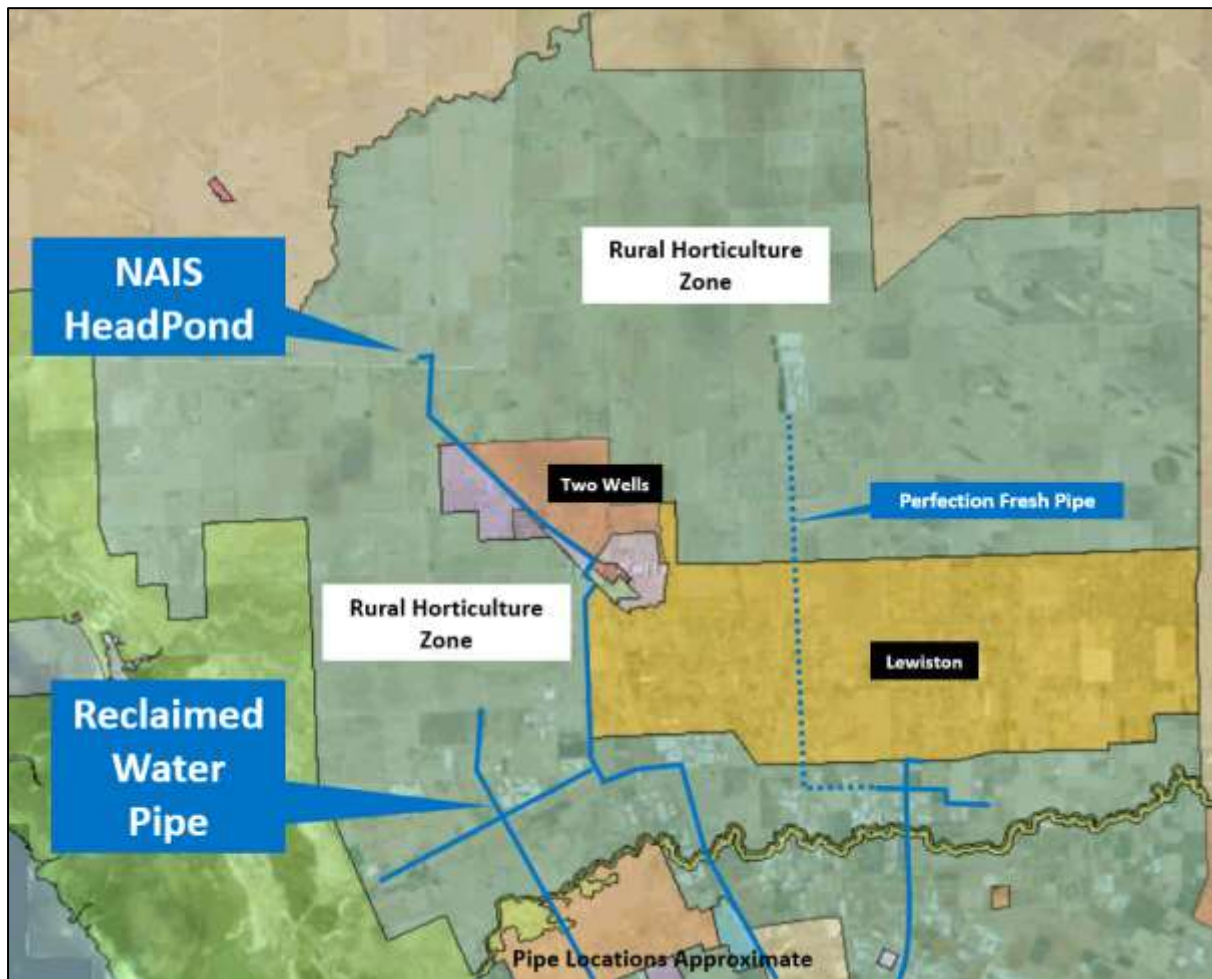
Examples of Utilities Infrastructure provided by Agencies

Ongoing work involving infrastructure providers, government and private sector is needed to ensure sufficient utilities for growth.

³¹ barossa.org.au/priorities/

Northern Adelaide Food Bowl and Irrigation Scheme

The Northern Adelaide Irrigation Scheme (NAIS) provides recycled water to irrigate crops, particularly horticulture. The project jointly funded by the South Australian and Australian Governments^{32 33}involved new water treatment facilities at Bolivar.



The Rural Horticulture Zone has a total area of 17,600 hectares

Delivered by SA Water, NAIS was intended to unlock 12GL of water to be used in agricultural food production. The goal is to support development of over 300 hectares of high-technology horticulture, and a further 2,700 hectares of advanced agri-food production.

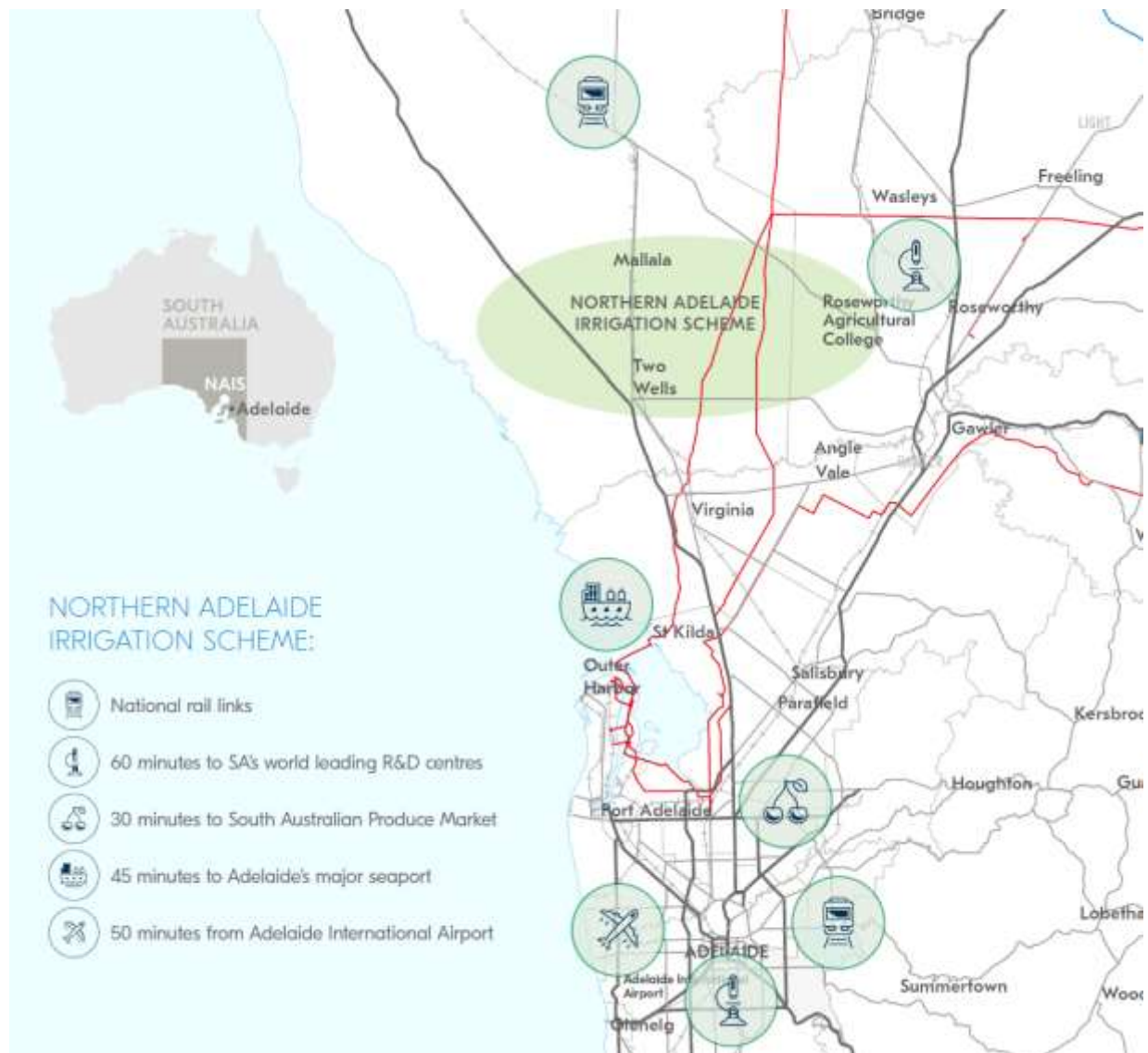
Capital contribution, availability charges and consumption charges all form part of potential users of NAIS accessing the water. sawater.com.au/nais/invest-in-nais

Current arrangements entail extremely low rates of take up of NAIS. The horticulture industry cite barriers of high capital contribution/connection costs, infrastructure augmentation requirements, access to NAIS infrastructure and the high cost and quality of water.

³² Australian Government \$45.6M and SA Government \$110M. SA Water NAIS Call for Project Proposals 2018

³³ nationalwatergrid.gov.au/program

This results in economic development, particularly horticulture, not being stimulated. The Rural Horticulture Zone is a total area of 17,600 hectares.



Success of the Northern Adelaide Irrigation Scheme is fundamental to the liveable growth of Adelaide Plains³⁴

The Northern Adelaide Irrigation Scheme: Market Proving Study³⁵ was undertaken by Arris for Council in 2015. The Allied Food Industries Land Supply Study³⁶ of 2017 recognised that high quality, fit for purpose recycled water offered through NAIS will likely lead to a diversification of primary industry activities occurring across southern and central regions and a shift in the manner in which farms operate and the land area required to accommodate new enterprises.

³⁴ Image from SA Water NAIS Call For Project Proposals 2018

³⁵ [Microsoft Word - Market Proving Study draft .docx \(apc.sa.gov.au\)](#)

³⁶ [apc.sa.gov.au/___data/assets/pdf_file/0017/355211/Allied-Food-Industries-Land-Supply-Study.pdf](#)

The study flagged that new entrants that may look to establish:

- Intensive horticulture – high value field and enclosed environments (both covered and high-tech)
- Tree crops (i.e. nuts, olives)
- Intensive animal keeping (e.g. feedlots, intensive poultry and pork)
- Viticulture;
- Organic produce
- Speciality crops (e.g. medical cannabis or hemp for fibre).

Direct allied food industries may include:

- Washing/processing/packing of produce (e.g. packing shed)
- Winery
- Bulk commodity storage
- Feed/hay processing mill

Ancillary food industries may include:

- Chemical resellers
- Cold storage
- Transport and logistics
- Equipment sales and service
- Nurseries
- Value-adding industries (e.g. food manufacturers)

AIS head-ponds and pipes were installed in Adelaide Plains around 2018 – 2020. This occurred concurrent with an update regarding the Horticulture Zone in the then Development Plan (now Planning and Design Code).

Council decision of 28 February 2022 ‘that the Chief Executive Officer brings back a report detailing the benefits or otherwise to Adelaide Plains Council and its ratepayers in reducing the size of the Horticultural Land tenure sizes within areas of Adelaide Plains Council and details the process involved and position of Department of Planning to support same.’

The Northern Adelaide Plains Food Cluster³⁷ is an industry-led organisation driving the strategic direction for the Northern Adelaide Plains with a focus on increasing profitability and sustainability for local businesses.



NAIS is intended to foster establishment of a diverse range of horticulture based and allied development south of Light River and centred around Two Wells. This will significantly intensify land use activity, economic development and employment.

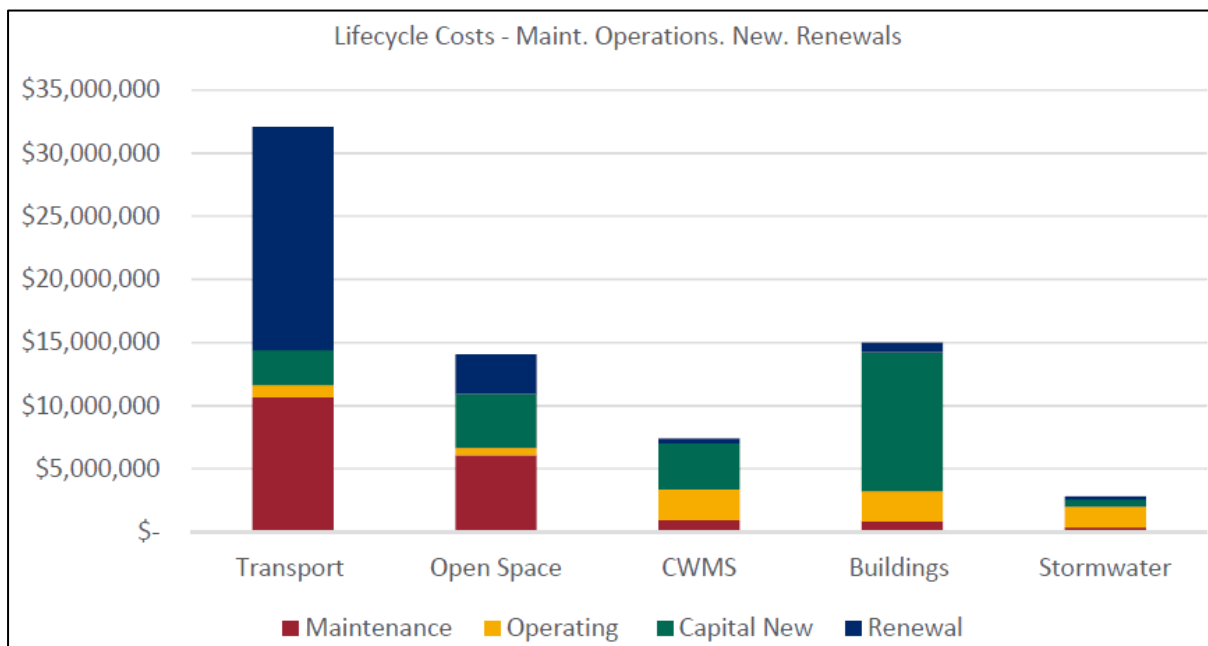
The uneconomic pricing of water as a barrier entails APC continuing advocacy with SA Water.

³⁷ northernadelaideplains.com.au/about-the-cluster

Council Assets

Council is responsible for assets with a total asset replacement cost of approximately \$140M. These comprise:

- Transport – roads, footpaths, kerb & channel, traffic control devices, bridges
- Stormwater
- Community Wastewater Management Systems (CWMS) at Mallala and Middle Beach
- Buildings
- Open Space – shelters, play equipment, seating etc



Operational and maintenance costs for the next 10 years are forecast³⁸ at around \$2.7M/annum. Capital outlay which includes renewals and new/upgrades are forecast at around \$4.5M/annum.

Council operates prudentially with respect to recurring revenue it receives, notably annual rate. It does this through annual review of the 10 year asset plan, annual business planning and careful operational delivery. Actively seeking funding and partnerships enables, for example, capital enhancements to be delivered through grants or by developers through contributions.

Population growth and increasing demand and use of CWMS assets will affect their useful life and will increase Council's maintenance and renewal program. A review needs to be undertaken to determine capacity to accommodate future demand from zoned residential land, including in existing townships where such land is not connected to CWMS. Growth from unzoned land will depend on timing and scale of rezoning.

³⁸ Numbers are summarised from the draft Asset Strategic Plan accessed mid-2021. Refer to the document for detail.

Council has limited funding capacity to increase capital works consequent on urban growth. Be it CWMS, sport and recreation, footpaths, roads, community spaces or offices.

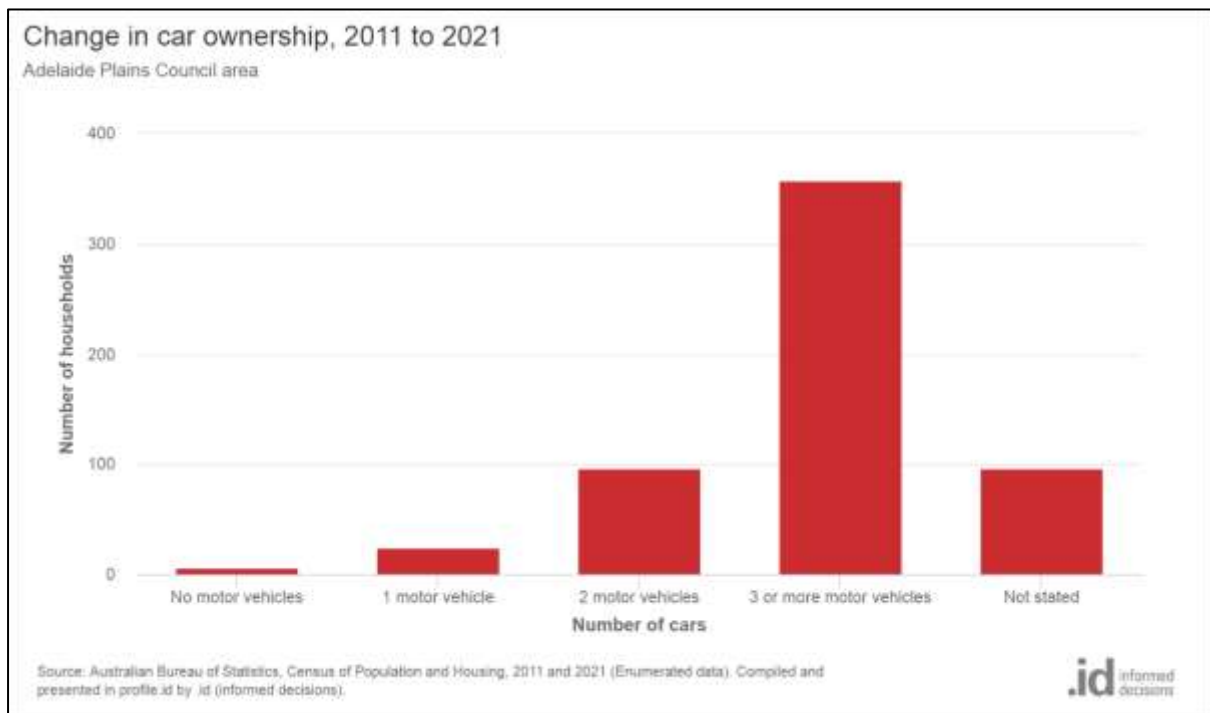
Council will work with State and Australian Governments, and community, business and development partners to realise necessary social and economic infrastructure.

Transport

Car/Bus/Community Transport

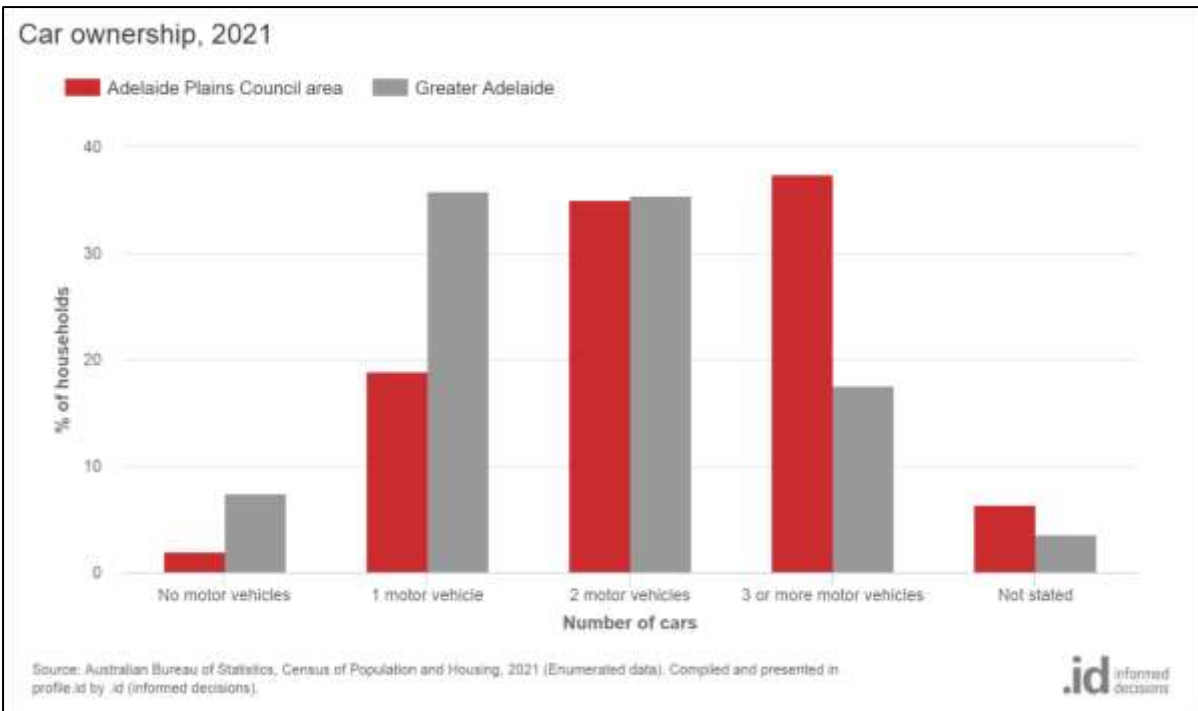
Being a functioning agricultural district with growing urban development, car ownership is high. Options³⁹ include a Council monthly bus to Gawler/Elizabeth, the Mid North Community Passenger network, and coach services. Major towns are not serviced by public transport.

Analysis of car ownership in 2016 indicates 70% of households had access to two or more motor vehicles, compared to 50% in Greater Adelaide. This signifies a reliance on private transport for existing residents to access work, services, education, shopping or leisure purposes within the district or regionally.

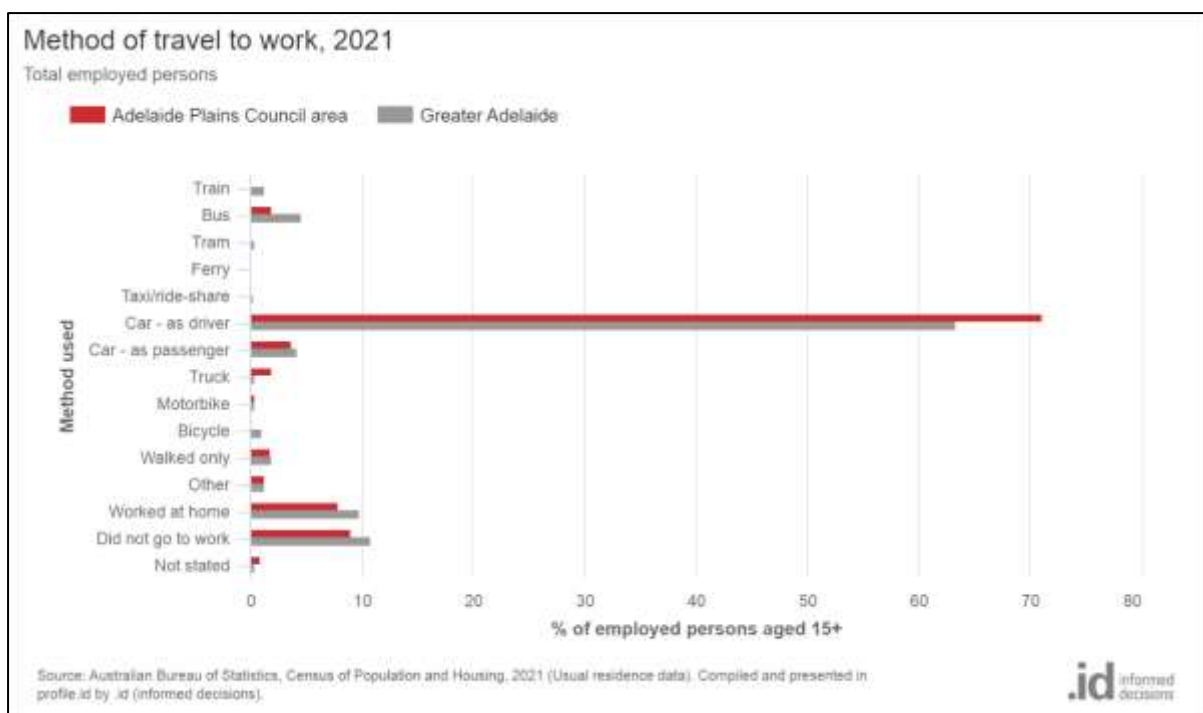


Across Adelaide Plains, parallel with household growth has been growth in 2 and 3 vehicle households

³⁹ apc.sa.gov.au/council-services/community/transport



Compared to Greater Adelaide, Adelaide Plains has a higher proportion of households with 3 or more vehicles



In 2021⁴⁰, 75% of people travelled to work in a private car, 2% took public transport and 1.9% rode a bike or walked. 7.9% worked at home, a higher rate than Greater Adelaide and possibly arising from many farms and horticultural businesses also being where residents live. These statistics signify a reliance on private transport

⁴⁰ apc.sa.gov.au/our-council/community-profile

for existing residents to access work, services, education, shopping or leisure purposes within the district or regionally.

Advocating for improved public transport, and exploring regional community passenger network and community bus is a Lighthouse Project in the Regional Public Health Plan.



Road and Rail Network

Transport is based on a road network that caters for private vehicles, trucks, cyclists, pedestrians and buses. The train line provides national freight and passenger services, and provides for some local freight in Mallala. The line is managed by the Australian Rail Track Corporation.

The Council area currently has 181 km of sealed and 541 km of sheeted roads, with the remainder being unsealed.



Image – State maintained roads carry between 500 and 20,000 vehicles per day
Electric Vehicles

Electric vehicles, including trucks and bikes, are emerging at commercially available rates, underpinning take up. The State Government is incentivising EV charging stations⁴¹ across South Australia. Whilst electric cars and ebikes are readily available, etrucks are now emerging, benefitting business. Electric vehicles primary benefit is reduced carbon output and lower traffic noise.



Image – etrucks are emerging lowering carbon and traffic noise

⁴¹ treasury.sa.gov.au/Growing-South-Australia/incentives-for-electric-vehicles

Walking/Cycling/Equine

As the towns grow, planning for walking/cycling networks is important to enable wellbeing benefits as well as options for greater numbers of residents to move locally and to nearby work. Ebikes make nearby work in agricultural areas accessible in shorter time. Research⁴² affirms the wellbeing and economic benefits of exercising more than 150 minutes/week. Equine movement is principally recreationally within Lewiston but with further planning, expanded trails could exist. Planning for these modes also enables recreation and tourism outcomes

Population and agribusiness growth means a significant increase in stress on the road network, especially given the lack of public transport and distances involved for work, services, education, shopping, leisure and freight.

Growth will increase some services in towns, in particular Two Wells, recognising that online services/shopping – particularly post COVID – has grown.

Growth will necessitate spending on roads accompanied by lobbying for the introduction of public transport services and augmented community transport. The business cases of traffic bypasses will need investigation, particularly at Two Wells noting residential growth of the town proper.

Increasing walking, cycling and equine infrastructure presents options for residents for better wellbeing and with ebikes, readier access to nearby agribusiness work or leisure.

⁴² orsr.sa.gov.au/__data/assets/pdf_file/0009/430569/ACTIVE-LIVES-HIGHLIGHTS.pdf

Environment

Natural Resource Management

Natural resources management is about striking a balance between preserving our natural environment and allowing natural assets to be used to generate income or to be used by the community for enjoyment and recreation.

Adelaide Plains Council is located within the Northern and Yorke Landscape Board region which extends for 38,500 square kilometres and encompasses the Yorke Peninsula, significant areas of Spencer Gulf and Gulf St Vincent, the southern Flinders Ranges, parts of the Rangelands, the Mid North, the northern Mount Lofty Ranges, the Barossa and northern Adelaide Plains

The Landscape Board recognises that many individuals and organisations share an interest in sustainable management of the region's landscapes and that managing our landscapes is about working together to ensure that the needs of the community, industries and the environment are balanced in a way that is sustainable.

With this balance in mind, the Board's vision⁴³ for region's landscapes is that they are 'a healthy, living landscape meeting the social, environmental, economic and cultural needs of the community, and ensuring the rights and wellbeing of future generations'.

As growth continues in the Council area, impacts on natural resources and landscapes will be a key consideration for all stakeholders. This includes existing landscapes, native vegetation, and additional greening.



⁴³ landscape.sa.gov.au/ny/about-us/our-regions-plan

Fire and Flood Hazards

Fire and flood hazards, be it from Gawler and Light Rivers, or the coast, have influenced the development of Adelaide Plains in the past.

Arising from the Emergency Management Act 2004, the framework for hazards is around risk reduction, incident operations and recovery.

Planning for growth involves considering reducing the risk from hazards as growth occurs.



Based on investigations involving emergency services, the statutory planning system establishes policy to enable development provided sited and designed with regard to hazard risk.

A new Planning and Design Code was introduced in 2021.

Planning and Land Use Services (SA Government) are undertaking investigations and Amendments to the Planning and Design Code with respect to the hazard of fire and flood risk associated with Gawler and Light Rivers. These are SA wide investigations.

Ongoing investigations are underway with respect to managing flood risk by the Gawler River Flood Management Authority. With grant funding, at Two Wells, Council is installing a levee to the east and south of town to reduce the hazard impact associated with Gawler River.

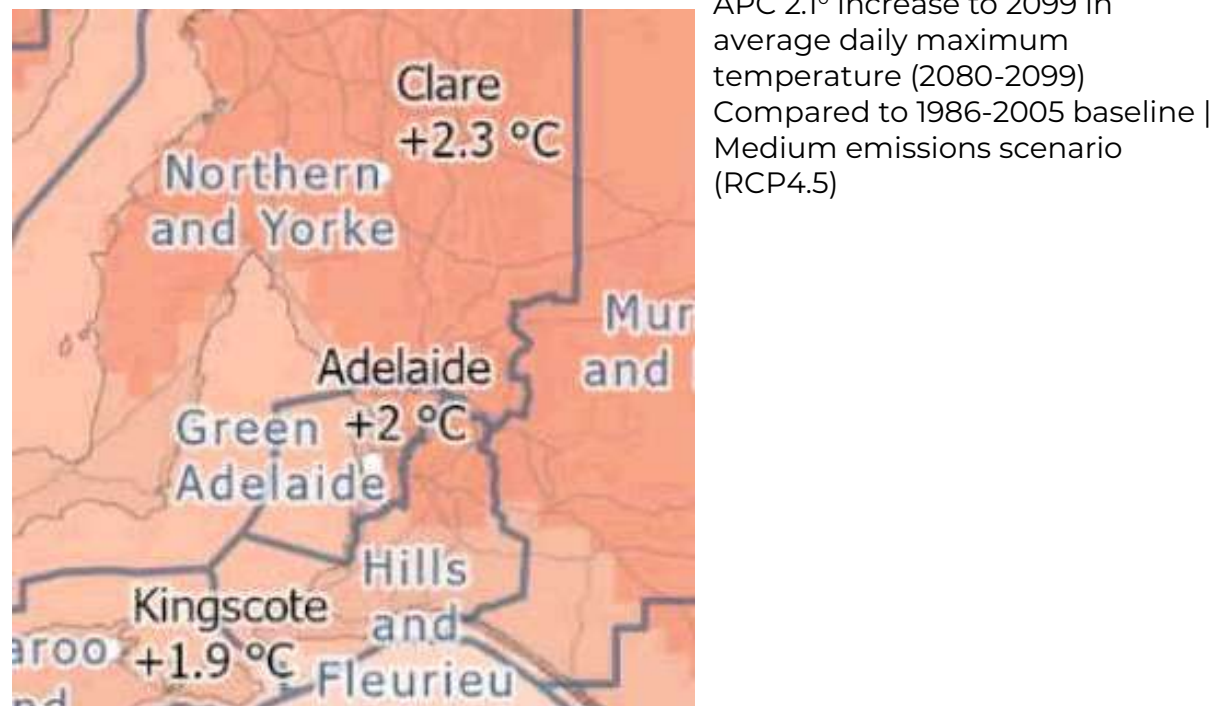
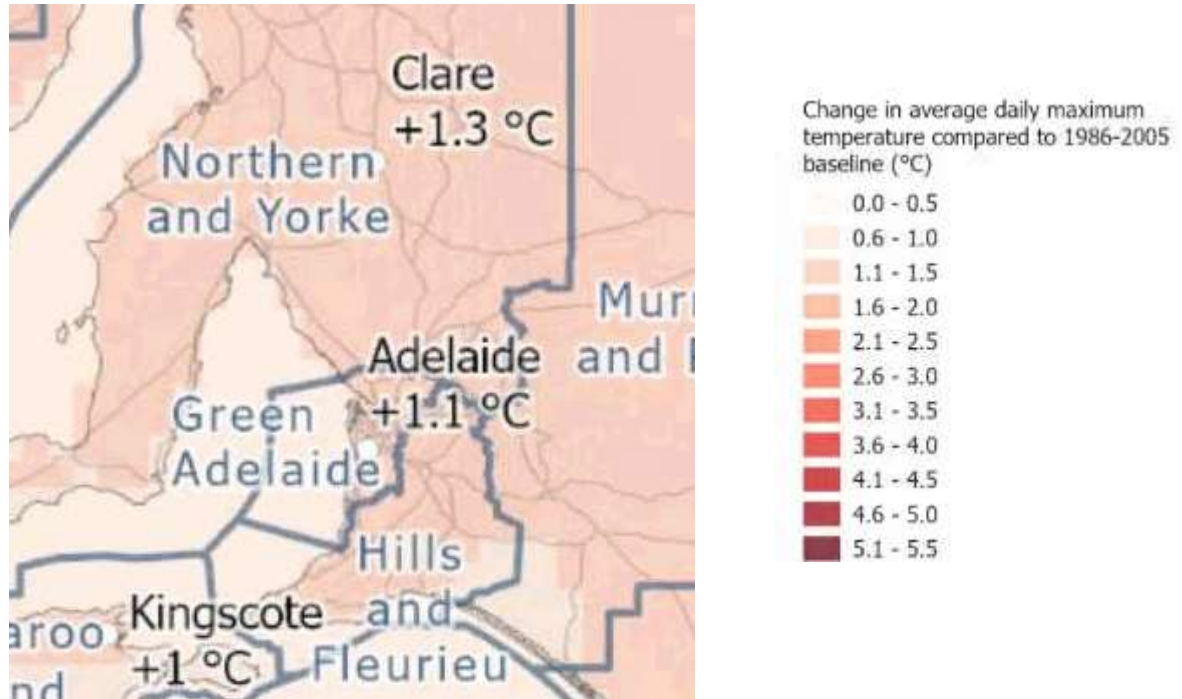
Regarding coastal inundation, past studies are informing contemporary Community Emergency Management Plans for each settlement. Past studies identify particular hazards at Middle Beach.

Better planning for flood and fire hazards improves investment potential as providing clarity about the rules by which development can and cannot occur.

Climate Forecasts to 2100

Department of Environment and Water 2022⁴⁴ analysis project increasing average temperatures, more days over 40 degrees, and lessening rainfall.

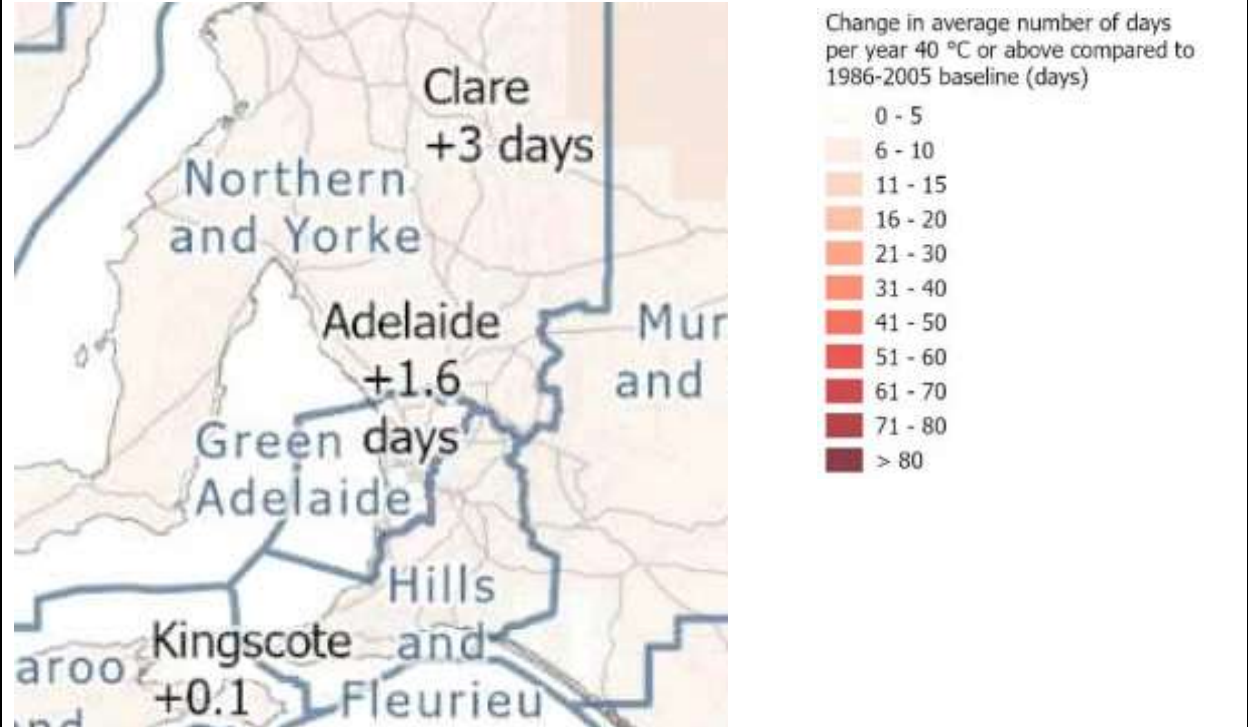
APC 1.2° increase to 2039 in average daily maximum temperature (2020-2039)
Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)



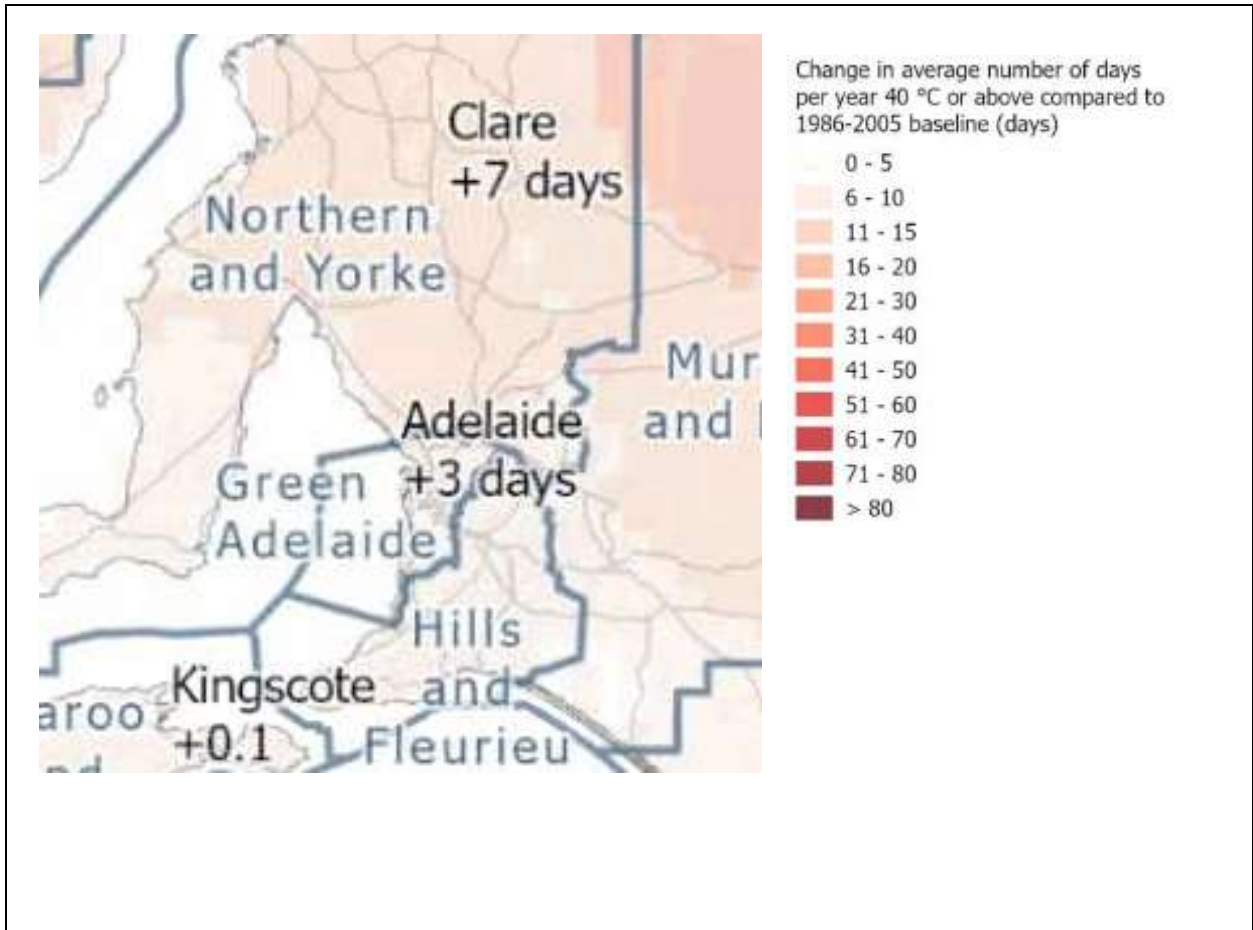
⁴⁴ environment.sa.gov.au/topics/climate-change/climate-science-knowledge-resources/latest-climate-projections-for-sa



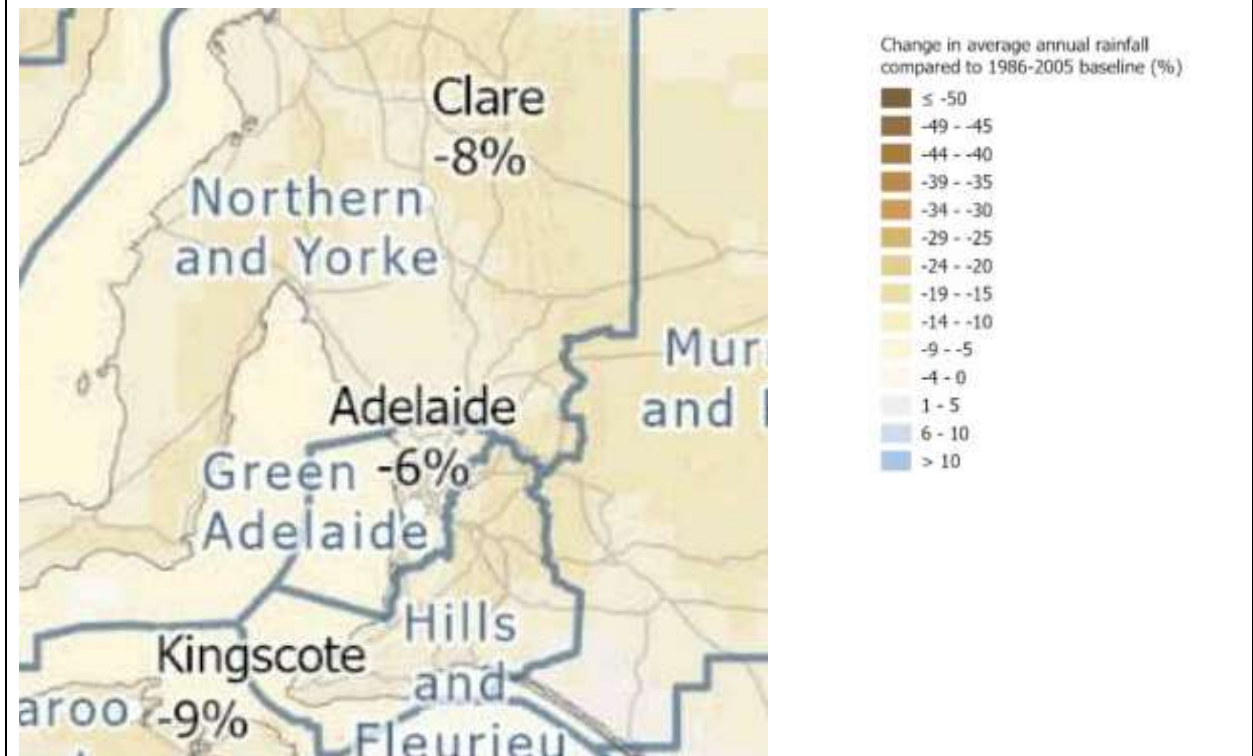
APC 1.6 increase in average number of days per year 40 °C or above (2020-2039) Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)



APC 4 increase in average number of days per year 40 °C or above (2080-2099) Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)

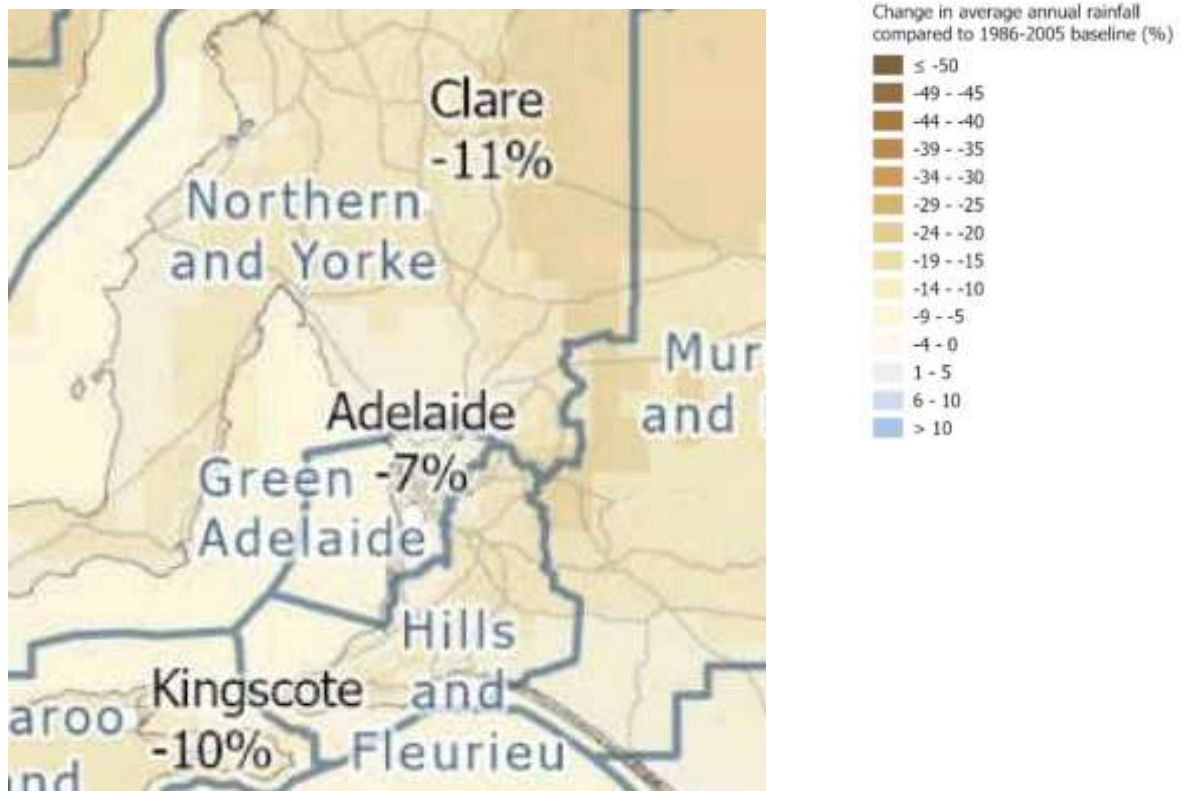


APC 7% decrease to 2039 in average annual rainfall (2020-2039)
 Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)



APC 9% decrease in average annual rainfall (2080-2099)

Compared to 1986-2005 baseline | Medium emissions scenario (RCP4.5)



Heritage

Adelaide Plains forms part of Kaurna Country. European settlement commenced as part of the European settlement of South Australia from 1836. Two Wells, Mallala, and Dublin are established towns, with coastal settlements at Parham, Webb Beach, Thompsons Beach, and Middle Beach. Extensive rural living and animal husbandry is at Lewiston. Other settlements include Windsor, Lower Light, Redbanks, Fischer, Barabba, Port Gawler, and Wild Horse Plains.

Identifying and conserving places of heritage value bring benefits economically, socially and environmentally.

A Heritage Australia 2010 study⁴⁵ concluded:

- Although some participants in the market may tend to shy away from heritage listed property, they wrongly perceive that such properties have inherent economic and restrictive problems, whereas there is a distinct and lucrative value added market that can be accessed.
- That conservation can and does create employment. There are costs associated with conservation but these are more than offset by the economic, social and psychological benefits. Precinct and area

⁴⁵ Heritage Australia: A review of Australian Material regarding the economic and social benefits of heritage property' - P Wills and C Eves for the NSW Heritage Office, March 2010

conservation helps people maintain their socio-cultural identity which would more than likely be lost through large scale demolition and redevelopment.

- Conservation does sometimes appear in the short term to come at a cost, but the long term benefits to the owner of the property and the community as a whole outweigh this cost. When carried out properly the heritage listing of a stand-alone or isolated properties can benefit the owner as well as those in the immediate vicinity

A 2005 report⁴⁶ by the Allen Consulting Group assessed several Australian studies which collectively demonstrated that property values are either neutrally or positively impacted by a heritage listing.

A national survey undertaken in the 2005 report revealed that 93% of the community see heritage as forming part of Australia's identity and that heritage places are important to protect. The survey also found that 80% strongly agreed or agreed that the historic houses in my area are an important part of the area's character and identity.

In 1983, a Heritage Survey of the Lower North included the District Council of Mallala⁴⁷. From that, 11 places are formally recognised as being of State Heritage value.

There are no local heritage listed places in Adelaide Plains. Legislation enabling local heritage listing was introduced in 1991. A heritage review commenced in 2021, with consultants undertaking assessments regarding statutory criteria.

There are no items of National, Commonwealth or World Heritage in Adelaide Plains.

Identifying and conserving Adelaide Plains heritage is important for the social and economic value represented. Recent work progressing heritage recognition should be completed. In time, further studies undertaken.

⁴⁶ Valuing the priceless: The value of Historic Heritage in Australia (research report 2), Allen Consulting Group for the Heritage Chairs and Officials of Australia and New Zealand, 2005

⁴⁷ environment.sa.gov.au/topics/heritage/sa-heritage-register/heritage-surveys

Projected Urban Growth Rate 2021 - 2041

South Australia is a small economy impacted by global economic trends. SA has historically had low growth per annum. Noting ongoing Commonwealth interest to foster and balance growth across Australia, it is not expected SA's rate of growth on a national basis will differ markedly from the past.

One of COVID's impacts is to reduce Australia's long term population growth⁴⁸.

Pre COVID, Australia was expected to have 33.3M in 2041. Post COVID, Australia is expected to have 31.5M in 2041. In 2041, there be 111,000 fewer South Australians. idconsulting state 'If you're planning over a 15-year+ horizon, the story is simple: fewer dwellings are forecast to be built in all regions, but most significantly in the inner city and growth areas'.

This projection about Adelaide Plains – including as a growth areas - is on the basis of South Australia continuing to experience low steady economic growth.

Two Wells/Lewiston is part of Adelaide's North Region⁴⁹. The North Region is the fastest growing region in SA, with significant industrial and horticultural areas. The area has extensive options for development including Two Wells, Riverlea, Roseworthy, Angle Vale and Playford. The age structure for this region reflects a large 'young' and 'older' working-age cohort with a substantial 0-14 age cohort.

3.3 Adelaide - North Region (SA4)

Including Elizabeth, Salisbury, Modbury, Enfield, Mawson Lakes, Gawler, Virginia, Two Wells and Roseworthy

Region Summary

The Adelaide - North region consists of Salisbury, Playford, Tea Tree Gully and Gawler councils, the eastern portion of Port Adelaide Enfield council, and small parts of the Adelaide Plains, Light and Barossa councils adjacent to Playford and Gawler.

The area has significant industrial precincts and also substantial horticulture areas. It is the fastest growing region in the state and at the 2016 census, the population was 429,924.

Gawler is the largest town with a population of 26,472.

This region has extensive options for future development particularly around Playford, Buckland Park, Gawler, Two Wells, Angle Vale and Roseworthy.



⁴⁸ Demographic Delays – How Closed Borders will Impact the Future Demand for Services, idinformeddecisions, May 2021

⁴⁹ Population Projections for South Australia and Regionals, 2016 – 41 Government of South Australia

Two Wells/Lewiston are part of the Adelaide North Region

Growth in Adelaide Plains will be impacted by nearby urban growth, such as in Playford and Light. Major estates like Roseworthy and Riverlea will accommodate their share of growth, and will impact the rate of completion of major estates as well as minor infill in Adelaide Plains.

Similarly, the rate by which employment in the northern food bowl grows will impact the rate of growth.

That said, the comparatively high rate in 2020 and 2021 appears consequent on various factors coinciding:

- Release of serviced land in Liberty
- Completion of infrastructure (including the Catholic secondary)
- Opening of the northern connector
- Commonwealth Covid related stimulus allowed for new housing
- Upgrades of community infrastructure, such as Two Wells main street and the Town Square
- The increased capability to work from home

Two Wells is an established community and township which prospective home builders immediately experience rather than waiting for these to be established. It is recognised that current retail offerings and social services will not adequately provide for the volume of forecast residential population.

One risk is that the COVID stimulus has brought forward demand that may in a few years see a slowing of the rate. Council's role to plan and upgrade infrastructure as well as deliver a range of services to enable liveable communities will continue to be critical to underpin investment confidence, be it a homebuilder or business.

Potential growth rates based around annual population increases over the next 20 years are outlined below:

Population (Council Area)	2021	2041	Average % increase/PA
Average Increase / Annum			
250	9655 ABS	14441	2%
300		15441	2.25%
350		16441	2.5%
400		17441	2.75%
450		18441	3%
2013 Two Wells DPA 'up to 9700 more residents' over 20 to 30 years		18200	3.8%

If planned residential growth occurs as forecast, Two Wells will grow from around 2555 in 2016 to around 10,500 in 2041. Two Wells goes from being the 41st to around the 12th largest town in South Australia.

Two Wells – from SA's 41st to 12th largest town in 20 years			
		2016	2041
1.	Adelaide	1.165M	
			(Mt Barker Council 56,000)
			(Riverlea is aimed for 30,000, maybe later than 2041)
2.	Gawler	26,472	
3.	Mt Gambier	26,148	
4.	Whyalla	21,501	
5.	Murray Bridge	16,804	
6.	Mt Barker Council	17,365	
7.	Victor Harbour	15,265	
8.	Crafers- Bridgewater	15,125	
9.	Pt Pirie	15,343	
10.	Pt Lincoln	14,088	
11.	Pt Augusta	12,896	
			Two Wells 10,500
12.	Goolwa	7,717	
13.	Nuriootpa		
14.	Strathalbyn		
15.	Naracoorte		
16.	Nairne		
17.	Millicent		
18.	Renmark		
19.	Kadina		
20.	Tanunda		
21.	Moonta		
22.	Berri		
23.	Wallaroo		
24.	Loxton		
25.	Roxby Downs		
26.	Clare		
27.	McLaren Vale		
28.	Angle Vale		
29.	Bordertown		
30.	Kapunda		
31.	Mannum		
32.	Hahndorf		
33.	Williamstown		
34.	Ceduna		
35.	Willunga		
36.	Lobethal		
37.	Freeling		

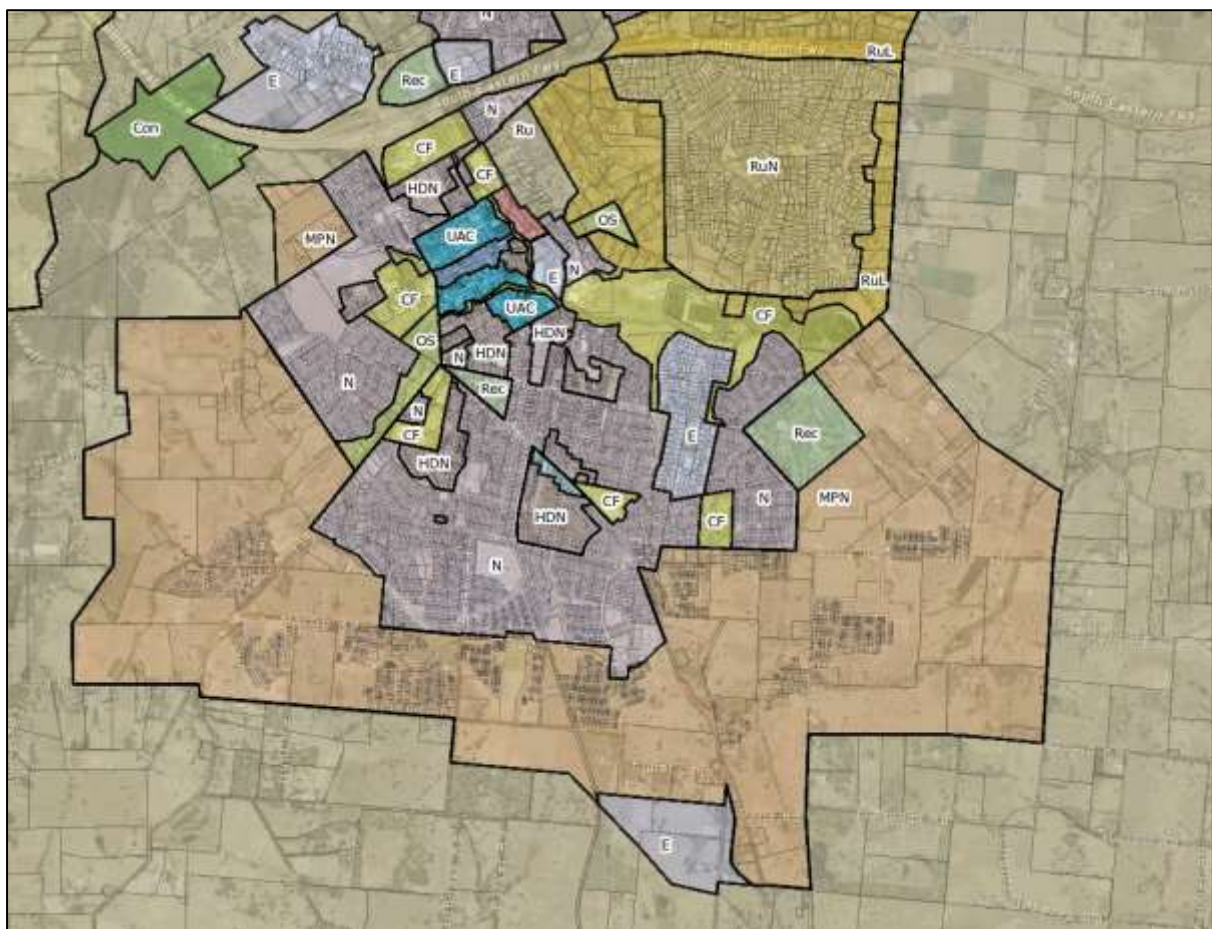
38.	Angaston	2044	
39.	Barmera	1935	
40.	Crystal Brook	1935	
41.	Two Wells	1926	
42.	Normanville	1906	

Comparing Two Wells and Mt Barker

The town of Mount Barker has and continues to experience significant urban growth. Rezoning enabling growth at Two Wells and Mt Barker townships occurred after 2011.

Comparing both based on ABS and population forecasts indicates the significant scale and rate of growth that may be impacting Two Wells in coming years as well as giving some context to that potential growth.

2011 - 2036	Mt Barker / Wistow ⁵⁰	Two Wells ⁵¹
Population Growth	21,928 4.26%PA	6,500 5.55%PA
2036	33,883	8,800
2021	18,401	2,743
2016	14,025	2,510
2011	11,955	2,280



Land Zoned around Mt Barker is Enabling Further Urban Growth

⁵⁰ Based on Mt Barker and Wistow, and Mt Barker Growth Area profile.id.com.au/mount-barker

⁵¹ profile.id.com.au/adelaide-plains and staff analysis of envisaged land division at Two Wells

Options for Future Planned Urban Growth

Council is aware of the ongoing challenge of planning for urban growth along with agricultural based business. Opening up land for new development will increase supply and impact the market as well as place more demand on services and infrastructure.

This is a consideration around what the need for land is, which land to rezone, and the timing of rezoning and land release. Other factors in planning for growth and whether to rezone further land include already available zoned and serviced land, value of land for primary production, flood risk, and the benefit to each town economically, socially and environmentally.

Regarding Two Wells and Dublin, in 2019 Council provided in-principle support to the Hicks Group Ltd and Leinad Land Developments (Dublin) Pty Ltd to advocate for boundary change to the Environment and Food Production Area (EFPA). There has been no change to the EFPA that would allow the rezoning of further residential land to date.

Mallala has zoned land yet to be developed. Likewise, there are land parcels in Rural Living Zones as yet to be developed, and the Deferred Urban land is a consideration.

A clear vision is needed to guide future planned urban growth.

Vision needs to be informed by investigations relevant to the context of each township that has regard to economic, social and environmental considerations.

This includes future potential urban growth at Two Wells and Dublin noting Council's support for progressing two rezoning objectives. Recognising growth planned at Two Wells and Mallala, Dublin's service role in the north west and proximity to substantial areas of the Bird Sanctuary and coast, considering Dublin's future is timely.

Local Government Impacts

Councils are faced with the need to balance service levels within financial constraints while meeting the expectations of the community. Councils must discharge their legal obligations as determined by several Acts of Parliament relative to the role of Local Government. Consequently responsible financial management and in particular, appropriate rates levels are necessary to provide the financial resources to meet those expectations and obligations. This is increasingly difficult in a growth environment when budgets are challenged by multiple needs, emerging community expectations and significant expenditure mandated by various legislative obligations.

It is widely acknowledged that Local Government is under significant pressure to provide ongoing and improved levels of service delivery while taking on additional responsibilities which were the traditional role of State and Federal Governments.

As a consequence Council is beginning to experience an awareness of the difficulty in meeting ongoing community expectations for service within existing organisation structures and financial constraints. The ability to maintain quality service delivery while at the same time manage expanded service role expectations and facility demand is an important challenge to address.



Rapid urban growth will place infrastructure, community services and assets under increasing pressure. Urban growth will place all areas of Councils services under increased strain and demand for services and infrastructure upgrades,

outside mandate infrastructure maintenance, will increase exponentially in coming years.

To address this pressure, Council needs a coordinated approach to managing and facilitating growth and the provision of necessary infrastructure and services that leads to liveable and economic towns and districts.

Attachment A - 30 YEAR PLAN FOR GREATER ADELAIDE

Adelaide Plain's is part of Greater Adelaide and the targets and policies of the 30 Year Plan for Greater Adelaide⁵² are to guide how growth of Adelaide Plains is to occur into the future.

This also means the State Planning Commission (custodians of the 30 Year Plan), and other entities such as Infrastructure SA, and all State Government agencies and departments, are interested in how Adelaide Plains is to grow..

The following tables sections analyse targets and policies for relevance to Adelaide Plains.

Targets

Targets		APC Relevance
Containing our urban footprint and protecting our resources	90% of all new housing in Outer Greater Adelaide will be built in established townships and designated urban development areas	Urban growth to be planned for
More ways to get around	60% of all new housing in metropolitan Adelaide (includes Two Wells and Lewiston) will be built within close proximity to current and proposed fixed line (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045	Public transport to be advocated about and planned for.
Getting active	Increase the share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide by 30% by 2045	Active transport to be fostered

⁵² livingadelaide.sa.gov.au/

Walkable neighbourhoods	Increase the percentage of residents living in walkable neighbourhoods in .. Outer Metropolitan* Adelaide by 25% by 2045	“
A green liveable city	Urban green cover is increased by 20% in metropolitan Adelaide by 2045	Greening to be fostered
Greater housing choice	Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045	Increased housing options to be planned for

Policies – Transit Corridors, Growth Areas and Activity Centres

Policies	APC Relevance
P9 Develop activity centres as vibrant places by focusing on mixed-use activity, main streets and public realm improvements.	Centres to be reinforced
P10 Allow for low-impact employment activities in residential areas, such as small-scale shops, offices and restaurants, where interface issues can be appropriately managed.	Provided for in SA Planning system and Planning and Design Code
P11 Ensure new urban fringe growth occurs only within designated urban areas and township boundaries and outside the Environment and Food Production Areas, as shown on Map 3.	Plan for growth
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, thereby discouraging “leapfrog” urban development.	Growth is to reinforce townships

Policies – Design Quality

Policies	APC Relevance
P25. Encourage urban renewal projects that take an all-inclusive approach to development by including streetscapes, public realm, public art and infrastructure that supports the community and responds to climate change.	Need to plan for integrated growth
P26. Develop and promote a distinctive and innovative range of building typologies for residential housing which responds to metropolitan Adelaide’s changing housing needs, reflects its character and climate, and provides a diversity of price points.	Provided for in SA Planning system and Planning and Design Code
P27. Provide for transitions between higher density and multi-storey, mixed-use developments in activity centres, corridors and existing detached housing precincts.	Provided for in SA Planning system and Planning and Design Code
P28. Promote permeable, safe, attractive, accessible and connected movement networks (streets, paths, trails and greenways) in new growth areas and infill redevelopment areas that incorporate green infrastructure.	Include as part of intended walking and cycling plans

P29. Encourage development that positively contributes to the public realm by ensuring compatibility with its surrounding context and provides active interfaces with streets and public open spaces.	Provided for in SA Planning system and Planning and Design Code
P30. Support the characteristics and identities of different neighbourhoods, suburbs and precincts by ensuring development considers context, location and place.	Provided for in SA Planning system and Planning and Design Code

Policies – Heritage

Policies	APC Relevance
P33. Recognise the value that communities place on heritage and ensure that new development is implemented sensitively and respectfully.	Provided for in SA Planning system and Planning and Design Code
P34. Ensure heritage places and areas of heritage value are appropriately identified and their conservation promoted.	Work underway. More work needed
P35. Encourage the innovative and sustainable reuse of heritage places and older building stock in a way that encourages activity and entices people to visit.	Provided for in SA Planning system and Planning and Design Code

Policies – Housing Mix, Affordability and Competitiveness

Policies	APC Relevance
P36. Increase housing supply near jobs, services and public transport to improve affordability and provide opportunities for people to reduce their transport costs.	Foster employment in proximity to housing
P37. Facilitate a diverse range of housing types and tenures (including affordable housing) through increased policy flexibility in residential and mixed-use areas, including: <ul style="list-style-type: none"> • ancillary dwellings such as granny flats, laneway and mews housing • dependent accommodation such as nursing homes • assisted living accommodation • aged-specific accommodation such as retirement villages • small lot housing types • in-fill housing and renewal opportunities. 	Need to monitor housing choice provision. Part provided for in SA Planning system and Planning and Design Code

P39. Promote universal and adaptable housing principles in new housing stock to support changing needs over a lifetime, including the needs of those who are less mobile.	Need to monitor universal design in housing. Part provided for in SA Planning system and Planning and Design Code
P40. Use government-owned land and large underdeveloped or vacant sites as catalysts for stimulating higher density development and innovative building forms.	Relevant at Two Wells
P42. Provide for the integration of affordable housing with other housing to help build social capital.	Provided for in SA Planning system and Planning and Design Code
P43. Increase the supply of affordable housing through the provision of 15 per cent affordable housing in all new significant developments. These developments include surplus and residential government land projects; declared major developments and projects; and rezoned land that increases dwelling yield (including all new growth areas).	Need to monitor. Part provided for in SA Planning system and Planning and Design Code Provided for in SA Planning system and Planning and Design Code
P44. Enable and encourage the provision of affordable housing through linking incentives, including the benefits of re-zoning such as planning policy bonuses or concessions to new affordable housing supply.	Consider in rezoning
P45. Promote affordable housing in well located areas close to public transport and which offers a housing mix (type and tenure) and quality built form that is well integrated into the community.	Consider in rezoning
P46. Ensure an adequate land supply is available to accommodate housing and employment growth over the longer term (at least a 15 year supply).	Need to monitor supply

Policies – Health, Wellbeing and Inclusion

Policies	APC Relevance
P47. Plan future suburbs and regenerate and renew existing ones to be healthy neighbourhoods that include: <ul style="list-style-type: none"> • diverse housing options that support affordability 	Relevant for all townships and settlements, including future growth

<ul style="list-style-type: none"> • access to local shops, community services and facilities • access to fresh food and a range of food services • safe cycling and pedestrian friendly streets that are tree-lined for comfort and amenity • diverse areas of quality public open space (including local parks, community gardens and playgrounds) • sporting and recreation facilities • walkable connections to public transport and community infrastructure. 	
P48. Create greenways in transit corridors, along major watercourse linear parks, the coast and other strategic locations to provide walking and cycling linkages.	Consider in trails strategy and walking cycling plans
P49. Encourage more trees (including productive trees) and water sensitive urban landscaping in the private and public realm, reinforcing neighbourhood character and creating cooler, shady and walkable neighbourhoods and access to nature.	Fostering greening and canopy needed
P50. Provide diverse areas of quality public open space in neighbourhoods (especially in higher density areas) such as local parks, community gardens, playgrounds, greenways and sporting facilities to encourage active lifestyles and support access to nature within our urban environment.	Monitor. Build on 2016 open space studies. Need a planned approach to open space, building on 2016 studies
P51. Facilitate and support the value of local ownership by supporting communities and businesses to help shape and look after their local open spaces and streetscapes.	Foster via engaging on plans and in there delivery. Part of council operations
P52. Support a diverse range of cultural initiatives, such as public art, to stimulate the revitalisation of communities and social cohesion.	Need to foster.
P53. Encourage the integration of green infrastructure in the public and private realms to support positive physical, mental and social health outcomes.	Fostering greening and canopy needed
P54. Prioritise Planning and Development Fund grants for improved access to quality public realm (such as playgrounds, linear paths and new open space purchases) at strategic locations.	Consider in actions.

Policies – The economy and jobs

Policies	APC Relevance
P55. Promote certainty to undertake development while at the same time providing scope for innovation.	Panning for growth fosters certainty
P56. Ensure there are suitable land supplies for the retail, commercial and industrial sectors.	Need to monitor land supply
Primary Production	APC Relevance
P57. Maintain and protect primary production and tourism assets in the Environment and Food Production Areas, while allowing for appropriate value-adding activities to increase investment opportunities (Refer to Map 5).	Need to monitor
P58. Ensure that the Environment and Food Production Areas, Character Preservation Districts and planning policies work in an integrated way to: <ul style="list-style-type: none"> · protect key primary production assets and opportunities · facilitate local operating and investment conditions that support primary production and related agri-business development · enable timely business adjustment and climate change adaptation by primary producers. 	Need to monitor. Council made a submission to the EFPA review in 2021
P59. Enable major new primary production and agri-business development across the Northern Adelaide and Barossa regions and in the Mount Barker-Murray Bridge corridor and prevent ad hoc land use changes that may compromise those investments.	Need to monitor.
P60. Ensure land use planning in and around the Virginia horticulture district aligns with projects for industry growth and revitalisation anticipated by the Northern Economic Plan.	Context
P62. Manage the interface between townships and adjacent primary production activities and areas of nature protection.	Provided for in SA Planning system and Planning and Design Code.
Tourism	APC Relevance
P63. Provide for sustainable tourism development across Greater Adelaide by: <ul style="list-style-type: none"> · protecting, enhancing and promoting the qualities that attract tourism and are of value to the whole community 	Council's TED seeks to foster

<ul style="list-style-type: none"> • providing appropriate support infrastructure for tourism • facilitating sustainably designed tourism accommodation in suitable locations • facilitating tourism-related developments such as restaurants, specialty retail accommodation and other value adding activities. 	
Mining and resources	APC Relevance
<p>P64. Protect existing mineral resource operations by:</p> <ul style="list-style-type: none"> • preserving adequate separation distances between mining activities, housing and other incompatible development • ensuring buffers are contained within mine sites wherever possible • mitigating potential interface issues • maintaining access to freight networks. 	Limited mining in APC
<p>P65. Identify and protect the high pressure gas pipelines and other key infrastructure services.</p>	Provided for in SA Planning system and Planning and Design Code.
Manufacturing Defence	How GSAP aligns
<p>P68. Focus business clusters and manufacturing hubs around key transport infrastructure such as road, air, rail, sea terminals and intermodal facilities to maximise the economic benefits of export infrastructure.</p>	Important to continue to foster employment consolidation near towns
Green Industries	How GSAP aligns
<p>P70. Ensure planning controls for employment lands are flexible to allow new green technologies and industries to emerge and grow.</p>	Provided for in SA Planning system and Planning and Design Code.
<p>P71. Encourage the establishment and expansion of medium and large scale renewable energy generation within the region.</p>	“
<p>P72. Encourage the development of large scale habitat restoration and conservation projects to increase environmental and primary production values and add to local economies and employment opportunities.</p>	Need to foster
Employment Land	APC Relevance
<p>P73. Provide sufficient strategic employment land options with direct access to major freight routes to support activities that require separation from housing and other sensitive land uses.</p>	Foster employment plans near freight routes

Policies – Transport

Policies	APC Relevance
P74. Ensure development does not adversely impact the transport function of freight and/or major traffic routes and maintains access to markets (Refer to Map 7).	Provided for in SA Planning system and Planning and Design Code.
P75. Increase the number of neighbourhoods, main streets and activity centres where place is given greater priority than vehicle movement by adopting a 'link and place' approach.	Action included in walking cycling plans
P76. Improve the amenity and safety of public transport stops, stations and interchanges by improving their connections to adjacent development and encouraging mixed-use development and housing diversity in close proximity.	Action included in walking cycling plans
P77. Ensure that new housing (and other sensitive land uses) permitted in locations adjacent to airports and under flight paths or near major transport routes (road, rail and tram) mitigates the impact of noise and air emissions.	Provided for in SA Planning system and Planning and Design Code.
P78. Improve, prioritise and extend walking and cycling infrastructure by providing safe, universally accessible and convenient connections to activity centres, open space and public transport (see Map 8).	Walking cycling plans and trail networks planned
P79. Encourage car share schemes and public electric car charge points in transit corridors, activity centres and higher density neighbourhoods through incentives.	Action included for Two Wells
P80. Reduce car parking requirements in mixed-use areas near high frequency public transit services to encourage the use of alternative transport modes.	Provided for in SA Planning system and Planning and Design Code.
P81. Protect current and future road and rail for strategic requirements, such as ensuring adequate access to ports and other major facilities (see Map 7).	Provided for in SA Planning system and Planning and Design Code.

Policies – Infrastructure

Policies	APC Relevance
P82. Coordinate and link strategic infrastructure across Greater Adelaide to ensure it meets the needs of a growing population with a changing demographic profile and supports a more productive economy.	Important to integrate land use and infrastructure planning
P83. Define and protect strategic infrastructure sites and corridors from inappropriate development to ensure the continued functionality of the services they provide.	Provided for in SA Planning system and Planning and Design Code.
P84. Protect major economic infrastructure such as airports, ports and intermodals from encroachment by incompatible development and facilitate further economic activity in these locations (See Map 7).	Provided for in SA Planning system and Planning and Design Code.
P85. Provide for adequate buffer zones around water and waste treatment plants and identify complementary activities that generate economic or community benefits that can occur in these areas (See Map 9).	Provided for in SA Planning system and Planning and Design Code.
P86. Ensure that new urban infill and fringe and township development are aligned with the provision of appropriate community and green infrastructure, including: <ul style="list-style-type: none"> • walking and cycling paths and facilities • local stormwater and flood management including water sensitive urban design • public open space • sports facilities • street trees • community facilities, such as child care centres, schools, community hubs and libraries. 	Important to plan as part of growth
P87. Encourage early provision of community infrastructure in fringe and township growth areas to assist in creating a sense of belonging and building community wellbeing.	Important to plan the timely provision of needed infrastructure
P88. Design and locate community infrastructure to ensure safe, inclusive and convenient access for communities and individuals of all demographic groups and levels of ability.	Actions included around the need and spatial location. Detailed design needs more work.
P89. Integrate and co-locate different community infrastructure and services in community hubs to maximise their use and enhance their economic feasibility.	Need a planned approach to social infrastructure in growth areas

Policies – Biodiversity

Policies	APC Relevance
<p>P90. Delineate and maintain areas with significant environmental values to protect landscape health; conserve biodiversity; and improve development certainty and transparency (represented in Map 10). This includes:</p> <ul style="list-style-type: none"> • Nature Protection Areas: These are largely undeveloped areas that retain significant environmental values recognised through existing legislation. This includes protected public lands (such as conservation and marine parks), private protected lands (such as Heritage Agreements), and areas of native vegetation and listed wetlands. These areas should be protected from development unless specific exemptions apply. • Complementary Developed Landscapes: These are substantially modified farming landscapes where existing land uses and significant environmental values, different from those in Nature Protection Areas, co-exist in a way that provides mutual benefits. The generally open and undeveloped nature of these landscapes should be maintained through appropriate zoning to support continuation of the primary production systems that create environmental niches for target species. 	<p>Consider 30YP areas in more detail.</p> <p>Conservation areas provided for in SA Planning system and Planning and Design Code.</p>
<p>P91. Protect coastal features and biodiversity including:</p> <ul style="list-style-type: none"> • habitats that are highly sensitive to the direct impacts of development • important geological and/or natural features of scientific, educational or cultural importance • landscapes of very high scenic quality. 	<p>Provided for in SA Planning system and Planning and Design Code.</p>

Policies – Open Space, Sport and Recreation

Policies	APC Relevance
<p>P98. Provide for a Greater Adelaide open space framework that builds on the Metropolitan Open Space System (MOSS) to create quality open space across the region. The open space will feature urban forests and parks, watercourse and coastal linear parks, trails, greenways, shared use paths and green</p>	<p>Build on 2016 Open Space studies</p>

buffers, and sustainable recreation and sporting facilities (See Map 11).	
<p>P99. Ensure quality open space is within walking distance of all neighbourhoods to:</p> <ul style="list-style-type: none"> • link, integrate and protect biodiversity assets and natural habitats • provide linkages to encourage walking and cycling to local activities, local activity centres and regional centres • be multi-functional, multiuse (including the shared use of strategically located school facilities) and able to accommodate changing use over time • incorporate the principles of Crime Prevention Through Environmental Design for safety and amenity • contain appropriate and low maintenance species and locate trees to maximise shade • encourage unstructured recreation opportunities such as the provision of a variety of paths and children's play equipment • foster a connection to the natural environment through the provision of nature play spaces and urban forest opportunities. 	Build on 2016 Open Space studies
P100. Ensure that the Planning and Development Fund is strategically aligned to public realm and open space projects which support the implementation of Greater Adelaide's new urban form.	Part of implementing
P102. Strategically locate sports and recreational facilities to cater for community needs.	Build on 2016 Open Space studies
P103. Ensure that public open space is adequately greened and irrigated (where appropriate) to act as a natural cooling system to reduce heat island effects in urban areas.	Foster greening and canopy

Policies – Climate Change

Policies	APC Relevance
<p>P105. Deliver a more compact urban form to:</p> <ul style="list-style-type: none"> • protect valuable primary production land • reinforce the Hills Face Zone, character preservation districts and Environment and Food Production Areas • conserve areas of nature protection areas • safeguard the Mount Lofty Ranges Watershed 	Plan growth to conserve agricultural and conservation land.

<ul style="list-style-type: none"> • reduce vehicle travel and associated greenhouse gas emissions. 	
P106. Protect key coastal areas where critical infrastructure is at risk from sea level rise, coastal erosion and storm surges, and ensure new coastal development incorporates appropriate adaptation measures.	Continue hazard planning
P107. Increase the proportion of low-rise, medium-density apartments and attached dwellings to support carbon-efficient living.	Foster increased housing options
P108. Promote green infrastructure (including green roofs, vertical gardens and water sensitive design) in higher density and mixed-use developments to assist with urban cooling, reduce building energy use and improve biodiversity.	Foster greening and canopy
P109. Support a zero waste culture by reducing the waste footprint of new development.	Foster waste reduction in development, including related to Council waste operations
P111. Create a more liveable urban environment through establishing a network of greenways, bicycle boulevards, tree-lined streets and open spaces, which will have a cooling effect on nearby neighbourhoods and buildings.	Foster greening and canopy in townships open spaces and walk/cycle ways
P112. Provide the opportunity for neighbourhood-level alternative energy supplies, which may include embedded and distributed renewable energy, co-generation and smart grid/green grid technology.	Provided for in SA Planning system and Planning and Design Code.
P113. Promote energy efficiency, the use of renewable energy sources and neighbourhood level alternative energy supplies and storage in new developments to reduce energy costs and carbon footprint.	Needs more work. Part provided for in SA Planning system and Planning and Design Code.
P114. Encourage the provision of electric vehicle charging points in new higher-density developments, large public and private car parks, activity centres and employment lands.	Potential with Two Wells growth

Policies – Water

Policies	APC Relevance
P115. Incorporate water-sensitive urban design in new developments to manage water quality, water quantity and water use efficiency and to support public stormwater systems.	Provided for in SA Planning system and Planning and Design Code.

Policies – Emergency Management and Hazard Avoidance

Policies	APC Relevance
P118. Minimise risk to people, property and the environment from exposure to hazards (including bushfire, terrestrial and coastal flooding, erosion, dune drift and acid sulphate soils) by designing and planning for development in accordance with a risk hierarchy of: <ul style="list-style-type: none"> • avoidance • adaptation • protection. 	Continue hazard planning
P119. Improve the integration of disaster risk reduction and hazard avoidance policies and land use planning.	Continue hazard planning associated with fire, flood and coast.
P121. Ensure risk posed by known or potential contamination of sites is adequately managed to enable appropriate development and safe use of land.	Provided for in SA Planning system and Planning and Design Code.
P122. Mitigate the impact of extreme heat events by designing development to create cooler communities through the use of green infrastructure.	Foster greening and canopy

SUBMISSION – PLANNING SYSTEM IMPLEMENTATION REVIEW



January 2023

Contents

OVERVIEW.....	2
REVIEW BACKGROUND	2
ABOUT PLANNING FOR ADELAIDE PLAINS	3
PLANNING DEVELOPMENT AND INFRASTRUCTURE ACT.....	3
Infrastructure Schemes.....	3
Environment and Food Production Area	7
Deemed Planning Consent.....	8
Deemed Approval/Minor Variations.....	8
Assessment Timeframes	8
PLANNING AND DESIGN CODE.....	9
Trees.....	9
Animal Husbandry Sub Zone – Local Policy	10
Large Sheds in Master Planned Township Zone	11
Conflict Between Agricultural Land Uses / Buffer Zones	12
EPLANNING AND PLANSA	13
Development Assessment Portal.....	13
Verification.....	13
Appendix A Council 2021 Submission to EFPA Review	14
Scope of Review	15
About the EFPA.....	16
Observations	18
EFPA Generally Aligns with Strategic Goals of Adelaide Plains.....	18
EFPA Not Allowing Housing with Horse Keeping or Dog Kennelling Needs Review	20
EFPA Rules Not being reflected in the Planning and Design Code is Discordant and Needs Immediate Change	22
EFPA Rural Living Settlement Employment Needs Review.....	23
Two Wells Planned Urban Growth Challenges and Opportunities.....	37
Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land	42
Appendix B Local Government Assessment Manager Forum November Submission	47
Appendix C Council Submission on Phase 3 Draft Code December 2020	53

OVERVIEW

This submission is provided to the Planning System Implementation Review.

Acknowledging the wide scope of the Review, this submission focusses on particular matters of relevance to Adelaide Plains. This submission draws on:

- Submissions by Council about the EFPA in 2021 and the draft Planning and Design Code in 2020.
- A submission by the Local Government Assessment Manager Forum to the Expert Panel.
- A shared view by officers from growth councils in Greater Adelaide on planning for infrastructure.

REVIEW BACKGROUND

During the March 2022 State Election, an election commitment was made to commission an independent review of the *Planning, Development and Infrastructure Act 2016* and the Planning and Design Code to ensure planning decisions encourage a more liveable, competitive and sustainable long-term growth strategy for Greater Adelaide and the regions.

The Minister for Planning, Hon. Nick Champion MP, has commissioned an independent panel of planning experts to conduct a review of reforms to the planning system implementation, including the:

- *Planning, Development and Infrastructure Act 2016*
- Planning and Design Code and related instruments, as it relates to infill policy, trees, character, heritage and car parking
- ePlanning system, to ensure it is delivering an efficient and user-friendly process and platform
- PlanSA website, to check usability and ease of community access to information.

We note discussion papers with questions were released on 17 October 2022.

Submissions are invited to DTI.PlanningReview@sa.gov.au

Council acknowledges that we are on the traditional country of the Kurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kurna people living today.

ABOUT PLANNING FOR ADELAIDE PLAINS

Council has been and is undertaking various projects to inform the future of the Council area. This is in the context of Council's Strategic Plan 2021 to 2024 as well as Council's Tourism and Economic Development Strategy¹.

Various projects underway include:

- draft Growth Strategy and Background Paper. This completed consultation in October 2022
- draft Equine Strategy and Background Paper. This completed consultation in November 2022
- updating Council's coastal adaptation strategy over 2023
- Dublin Growth and Tourism Master Planning to commence in 2023
- Council Wide social and community infrastructure planning, and updated open space planning. To commence in 2023
- draft Two Wells Walking Cycling Plan. To be consulted on in 2023
- Heritage Amendment to the Planning and Design Code.

Updating policy for hazards associated with riverine flood, in particular Gawler and Light Rivers, and fire, acknowledging the impacts of the Pinery fire are continuing. These are of key relevance for Adelaide Plains.

PLANNING DEVELOPMENT AND INFRASTRUCTURE ACT

Infrastructure Schemes

Planners from growth Councils of Greater Adelaide have collaborated on preparing a response to the Expert Panel regarding the need to establish workable infrastructure schemes for large and complex land developments.

The collaborating councils include Adelaide Plains, Gawler, Light Regional, Onkaparinga, Playford, Salisbury, Mount Barker and Barossa. Each Council will be forwarding an individual response.

The councils agree with the expert panel that as provided in the *Planning, Development and Infrastructure Act 2016* (the Act) the General and Basic infrastructure scheme are overly complex and difficult to work with, if operable at all.

Two quotes from the Expert Panel Discussion Paper are illuminating:

*"The provisions regarding general infrastructure schemes have **not yet** commenced and before they have commenced, the Commission must conduct an inquiry into the schemes in relation to the provision of essential infrastructure under Part 13 of the PDI Act, and a report on the outcome of the inquiry must be laid before both Houses of Parliament (pg. 31)".*

This is a very concerning delay in the provision of essential infrastructure, which in turn would be a drag on project implementation and overall economic development, despite the Act being in place since 2016.

¹ apc.sa.gov.au/our-council/council-documents/councilplans accessed 18 October 2022

The Discussion Paper also highlights the complexity of managing these infrastructure projects:

*“The legislative provisions surrounding infrastructure schemes under the PDI Act are **far more detailed and complex** than the legislative provisions in most other jurisdictions (pg. 33)”.*

Councils have responded to this legislative and policy gap with local developer contributions schemes using Deeds and Infrastructure Agreements anchored to affected properties by Land Management Agreement/s. In some cases, separate rates are levied on properties once developments reach a trigger.

Adelaide Plain’s infrastructure experience can be characterised as the misalignment of infrastructure planning by State level entities with planning for land use growth.

Two Wells grew at 4.8% per annum from 2016 to 2021. Two Wells comprises 80% of population growth in Adelaide Plains. A rate of 4.8% population growth is a similar rate to that of Mt Barker and far higher than Greater Adelaide.

Population growth at high rates needs matching planning and delivery of infrastructure.

Council acknowledges its own infrastructure role and has aligned its 10-year financial plan and asset plans to support population growth that is liveable and sustainable. This includes Council’s role in community facilities, open space, greening, transport and base council services).

Infrastructure agencies are generally well set up to work with land and property developers with individual development proposals.

Infrastructure agencies are however less well set up to deal with councils who present different issues when undertaking planning for growth and subsequent Code amendments.

There is a not insignificant gap in operational practice of agencies. A few examples:

- The intent of the 2018 Northern Food Bowl Protection Areas Development Plan Amendment rezoning a significant portion of Adelaide Plains for development of horticulture and agribusiness development was supported by SA Water. However, for land owners with land now rezoned, the cost of water infrastructure works is cost prohibitive. To date, the outcome has been markedly slow take up of land for horticulture and agribusiness, notwithstanding ongoing discussions involving SA Water, Council and the Northern Adelaide Plains Food Cluster.
- The intent of the 2013 Two Wells Residential Development Plan Amendment is growth of Two Wells to around 10,000 residents in the long term. Much of this population growth is occurring. However, transport infrastructure agreed prior to the rezoning via Deeds with the Department of Infrastructure and Transport (DIT) has not been delivered in the time expected. This is notwithstanding ongoing discussions involving DIT, Council, Hickenbotham as the major land developer, Catholic Education SA with a school with from zero to 600 students in three years, and the Minister for Transport.

Along with misalignment of infrastructure planning by entities with growth, **Adelaide Plains continues to experience lack of usable tools within the planning legislation to seek infrastructure upgrades associated with a proposed development that are some distance from the development site.**

Council’s planning officer’s legal ability to get council infrastructure upgraded as part of a land division (or even a major land use development) continues to present practical challenges.

- For many years, planning legislation has not allowed Councils to seek augmentation and headworks costs beyond the boundaries of the site of the proposed development.
- This has been confirmed over the years by letters from Planning Ministers. Council planners are legally unable to condition off-site road/drainage/CWMS upgrade costs that are needed to service and support the proposed new lots or development.
- Past views have included that Council should refuse the development in these circumstances. If Council officers are generally supportive of the proposed development provided the roads/drainage/CWMS are improved, this view is less than helpful.
- As a work around, many councils negotiate with developers parallel 'infrastructure agreements' that set out infrastructure works to be undertaken external to the site, including costings and staging. The development application is on hold pending completion of this separate process.
- The ongoing lack of a tool in the planning legislation is at odds with Planning and Design Code Policy as well as former Development Plan policy seeking proper infrastructure servicing of proposed developments.
- The infrastructure provisions in the PDI Act are convoluted and complex and not fit for purpose to be entered into for off-site needed infrastructure augmentation. The PDI Act scheme is not mandatory and has no incentive or trigger to get involved.
- State agencies, in particular SA Water and SA Power Networks, have always asked for their augmentation costs as a condition of land division consent (and their requirements are vague as to the costings) whereas any condition of like effect put on by a council would be called ultra vires by the Courts and the validity questioned on the lack of specificity
- It is not a level playing field and councils have had to approach this the hard way, without clear statutory support and reliant on developers coming to the party rather than face a refusal

Alternative solutions to Land Management Agreements and Deeds are required to enable the development of the State's strategic growth areas like Adelaide Plains. The solution needs to work for these areas because they require co-ordinated infrastructure delivery and rezoning where not all landowners are in agreement and where the infrastructure provision may have a long horizon and several providers.

The combined councils strongly believe based on our combined experiences there must be a **whole of government** approach, requiring all relevant parties to come together to discuss and ultimately agree to revised schemes for infrastructure requirements, its delivery and funding. The Councils agree with the State Government's position that infrastructure delivery must be resolved prior to the commencement of a related Code Amendment. There would be a benefit in ensuring that for certain larger-scale undertakings, detailed Structure Planning precedes related infrastructure negotiations and Code Amendments.

Given the need to expedite development in SA, a simpler system can be developed to ensure that there is a common understanding of required infrastructure contributions at the outset of each project requiring same. The combined councils contend that a 'case by case' approach as currently utilised is delaying infrastructure projects from housing to employment lands and hence holding up both orderly and economic development.

Infrastructure Schemes should be clear and straightforward in what they need to achieve based on the following principles - **strategic, equitable, sustainable and best practice, adaptive, and economical**

Within the Discussion Paper – Planning, Development and Infrastructure Act 2016 Reform Options, we note the Jurisdictional Comparison. The combined councils consider there is substantial merit in further exploring alternative legislative provisions noting there is support within the combined councils for a similar approach taken by the Victorian Planning Authority. It is noted that the State of Victoria has been operating a Developer Contributions Scheme since 2003.

The combined councils have been asked to respond to the following questions on Infrastructure Schemes posed by the Expert Panel:

1. What do you see as barriers in establishing an infrastructure scheme under the PDI Act?

- Acknowledging that one of the schemes is not operational, the schemes are overly complex with numerous decision-making points by different owners.
- Councils are concerned that most of the decision making, and control comes from the State Government when Local Government has the knowledge, links to the community and current and future ownership of most of the infrastructure.
- The schemes provide no guidance on where the upfront investments will come from.
- The schemes provide no usable planning tool for off development site infrastructure augmentation.
- Separately, the schemes place considerable responsibility on the ‘Scheme Coordinator’ role, making this the subject of potential governance risk in conducting negotiations with more than one landowner/ developer.
- The Scheme Coordinator approach may lack the ability to involve key stakeholders, e.g. government agencies and/ or key utilities to ensure timely deliverables.

2. What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?

- It is considered the issues identified in question 1 plus the recommendations in questions 3 should be considered.
- Infrastructure definitions be reviewed to incorporate open space and recreational facilities
- The Act should be amended to ensure Structure Planning of growth areas with infrastructure designs and costings occurs prior to the rezoning process.
- The Act needs to require that the State Government provides for an effective whole of government infrastructure co-ordination that aligns with Regional Plans, including funding mechanisms for infrastructure agencies. It is difficult for councils to engage with infrastructure providers (e.g. SA Water, SAPN/Electranet and the Department for Education) at the strategic planning and rezoning stages. Agencies need to be committed to providing services to facilitate and support development opportunities.

3. Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?

A ‘Whole of Government’ approach (including Transport, Education, Health and Wellbeing, Emergency Services, Environment, Recreation and Sport, Local Government etc.) via an empowered authority would appear to be an effective alternative model to consider exploring.

For instance, the Victorian system has been identified as having a better coordinated infrastructure model and provides an example of measures that could be adapted to SA such as:

- Predetermined contribution costs for various types of infrastructure, with the ability to alter the agreed cost when identified in a structure plan.

- A State infrastructure fund to pay for infrastructure prior to development proceeding and costs being recouped.
- A minimum requirement that 10% of land is allocated towards key infrastructure at the structure planning stage.

Anecdotal feedback suggests the Victorian model benefits all stakeholders (including landowners, developers, communities, local authorities, State Departments/agencies, key utilities etc.) by being aware of a contribution-based approach in contemplating rezoning and development opportunities.

The combined councils are interested in exploring such a model with the State Government and other stakeholders, acknowledging the councils would maintain an interest in continuing to manage key local infrastructure decisions and delivery management arrangements.

Any processes need to ensure key triggers for delivery of required outcomes. As development assessment is problematic as a trigger for infrastructure delivery and relying upon the Land Management Agreement/ Infrastructure Deed model can also be problematic. It is considered that creating another legislative device that can be attached to an affected Certificate of Title, similar to a LMA may be worth considering as an addition to the current tools.

Environment and Food Production Area

As you are aware, the Environment and Food Production Area (EFPA) was brought into operation in 2017 under the *Planning, Development and Infrastructure Act 2016*. The Act requires the Commission to review the EFPA every five years. The next five-year Review is due in 2027.

Council made a formal submission to the 2021 EFPA Review (**Appendix A**). The outcome of the 2021 EFPA Review were minor boundary changes.

Two matters in our submission were considered out of the scope of the review by the Commission.

These include the EFPA:

1. Not Allowing Housing with Horse Keeping or Dog Kennelling, despite this form of development being appropriate within the EFPA.
2. Not being reflected in the Planning and Design Code being Discordant with the EFPA, sending confusing mixed messages to land owners and potential investors and needing immediate change.

The fact that the matters raised in our submission remain not considered is the sign of a planning system needing reform.

The matters raised in our submission continue to influence the orderly development of land in a manner consistent with the EFPA.

We ask that the Review consider the current legislative tools that underpin the EFPA and gaps in their operation. Particularly where EFPA and Planning and Design Code policy are inconsistent.

Ideally, we'd like the two matters in our submission 'addressed and resolved'. If not possible, we seek that the Review consider whether the legislative tools in the PDI Act guiding the operation of the EFPA are fit for a contemporary planning system.

Deemed Planning Consent

The Local Government Assessment Manager Forum submission (**Appendix B**) identified a range of problems with the current arrangements for Deemed Planning Consents.

The submission states 'Assessment managers are of the view the deemed consent approach does not provide a basis for collaborative relationships with applicants that in turn deliver more appropriate planning outcomes'.

The submission identifies only Queensland has deemed consents, with NSW having deemed refusals, and Victoria, WA and Tasmania providing for review by a court on the facts and the court making a considered and independent determination on the application.

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the Deemed Planning Consent approach.

Deemed Approval/Minor Variations

The Local Government Assessment Manager Forum submission (**Appendix B**) identifies a range of problems with the current arrangements for Deemed Approvals/Minor Variations.

The submission states 'There are some examples of accredited professionals interpretation being such that they have effectively undertaken a performance assessed development, including on notifiable development.'

'This issue is exacerbated with the ambiguity that is created with s106(2) of the Act in relation to minor variations. The Deemed to Satisfy (Minor variations) is subject to various interpretations and has created uncertainty and delayed approvals, as identified by the Panel's discussion paper. This varying interpretation has resulted in poor outcomes for applicants. The difficulty with the interpretation was highlighted when a cross sector working group established by PLUS was unable to define what constitutes minor variations.'

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the approach to Deemed Approvals and Minor Variations.

Assessment Timeframes

The Local Government Assessment Manager Forum submission (**Appendix B**) supports the Expert Panel's observation that there should be a review of assessment timeframes.

The submission states 'It is not reasonable to expect an application for 19 plus dwellings or large-scale warehousing to be assessed in 20 days, yet this is currently the case.'

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the Assessment Timeframes.

PLANNING AND DESIGN CODE

Trees

We note the Discussion Paper considers trees not in metropolitan Adelaide as well as Native Vegetation. These involve Adelaide Plains.

The Discussion Paper questions posed are below in italics.

Tree Canopy

Q What are the implications of master planned/greenfield development areas also being required to ensure at least one (1) tree is planted per new dwelling, in addition to the existing provision of public reserves/parks?

Q If this policy was introduced, what are your thoughts relating to the potential requirement to plant a tree to the rear of a dwelling site as an option?

We support one tree being required on each dwelling site in master planned/greenfield development areas. Increasing risk of heat is a known climate change hazard. Requiring one tree in association with a proposed dwelling works to increase onsite shade and greening and contribute to a cooler, more climate friendly master planned housing estate.

Most householders plant one tree in the rear yard. If a tree is planted in the front yard, from a compliance perspective, it can easily be viewed from the street. Resources for compliance are an ongoing issue for council.

Preference for planting in the front or rear yard depends on orientation of the lot. Shading the house itself is just as important as the rear yard. Council is open to Code 'required' trees being planted in the front or rear yards provided Adelaide Plains Council areas is included in State commissioned aerial photography of tree coverage. Current tree mapping does not cover Adelaide Plains.

We support further expansion of community education about greening into Adelaide Plains.

Native Vegetation

Q What are the issues being experienced in the interface between the removal of regulated trees and native vegetation?

Q Are there any other issues connecting native vegetation and planning policy?

Council officers have observed numerous applicants for development formally 'declaring' their proposed development does not impact Native Vegetation and only on limited occasions, applicants voluntarily providing proper information justifying this declaration. This is accepted as Council officers are not in a position to check the validity of an applicant's 'declaration'.

We support the Panel's recognition of the importance of '*...the ability for applicants to access information about whether native vegetation is present on their land, and if so, how they can avoid impacting the same.*'

Noting a range of native vegetation information and tools are on the Department of Environment and Water website, we propose these should be augmented to enable land owners to easily identify whether there is native vegetation on their land.

Animal Husbandry Sub Zone – Local Policy

Adelaide Plains Animal Husbandry Subzone is the only location within SA that this subzone applies. Prior to the introduction of the Code, the Animal Husbandry Zone was part of the Mallala Development Plan. The Animal Husbandry Sub Zone is a subzone of a Rural Living Zone, with both overlaid by the Environment and Food Production Area.

Council made a formal submission to the 2020 consultation on Stage 3 of the draft Planning and Design Code (**Appendix C**) around the issue of the Animal Husbandry Sub Zone within the Rural Living Zone .



Figure: Adelaide Plains contains SA's Premier Rural Living/Animal Husbandry Zone

For SA's premier Animal Husbandry area, our observations about the Planning and Design Code are as follows:

- Setback patterns envisaged in the Code are not achievable when the majority of rural living lots are 30 m in width e.g. 50m setback Deemed to Satisfy (DTS) for a horse stable; 35m setback DTS for kennels, stables, shelters, associated yards.
- There is a lack of information justifying the 20-dog basis as a DTS.
- The lack of notification of large-scale horse keeping and dog keeping on large site, at odds with APC's 2020 submission

APC 2020 submission	Comment re 2022 Code
It is recommended that 'animal keeping', 'low intensity animal husbandry' and 'horse keeping' should be listed as classes of development to be exempt from notification, subject to criteria that large scale horse keeping or dog kennelling proposals will undergo public consultation.	Large scale horse keeping not notified, at odds with Council 2020 submission. Dog keeping on sites greater than 1HA not notified, at odds with Council submission that 'large' dog kennelling be notified.

Restricted Development - the 1,000sq m floor area threshold exclusion for a 'shop' is far too generous and the 2019 figure of 200m² should be reinserted.

Shops DTS standard 50m² consistent with Council submission

The Local Government Assessment Manager Forum submission (**Appendix B**) states 'It is recommended the Expert Panel also give consideration to the inclusion of additional local policy in the Code. The announced changes to heritage and character to bring strong controls is welcomed and this initiative should be extended to consider other policy gaps / deficiencies in the Code that have been identified by various stakeholders.'

The Code could readily be amended through Technical and Numeric Variations to call up appropriate local policy for the Animal Husbandry Sub Zone.

The Animal Husbandry Sub Zone is only within Adelaide Plains

The former Development Plan's suitable local policy was removed through creating the Planning and Design Code, notwithstanding submissions by Council.

The Expert Panel is requested to consider a State wide approach to resourcing reinstating Code equivalent local policy – including Adelaide Plain's distinct Animal Husbandry policy - that was removed by introducing the Planning and Design Code.

Code equivalent local policy could be further augmenting technical and numeric variations, and could be Character Statements applying in 'local areas'

Large Sheds in Master Planned Township Zone

A development trend is for large sheds associated with new dwellings in the Master Planned Township Zone. Within Two Wells this include the Liberty and Eden housing estates that will eventually accommodate some 5 – 6000 residents.

As a peri-urban Council on the edge of Greater Adelaide, Council is receiving numerous applications for large sheds (for example, greater than 90m² and with wall heights above 3.6m) within the Master Planned Township zone and includes the following DTS maximum criteria:

- floor area 60m²
- wall height 3m
- overall height 5m

Where shed applications do not meet the DTS standards, an on balance, case by case assessment using the Performance Outcomes within the Planning and Design Code is undertaken. We note that former Development Plan had larger wall height and area criteria for sheds.

Ask the Expert Panel to be aware of trends for large sheds in the Master Planned Township Zone within peri-urban Adelaide Plains and consider existing policy parameters.

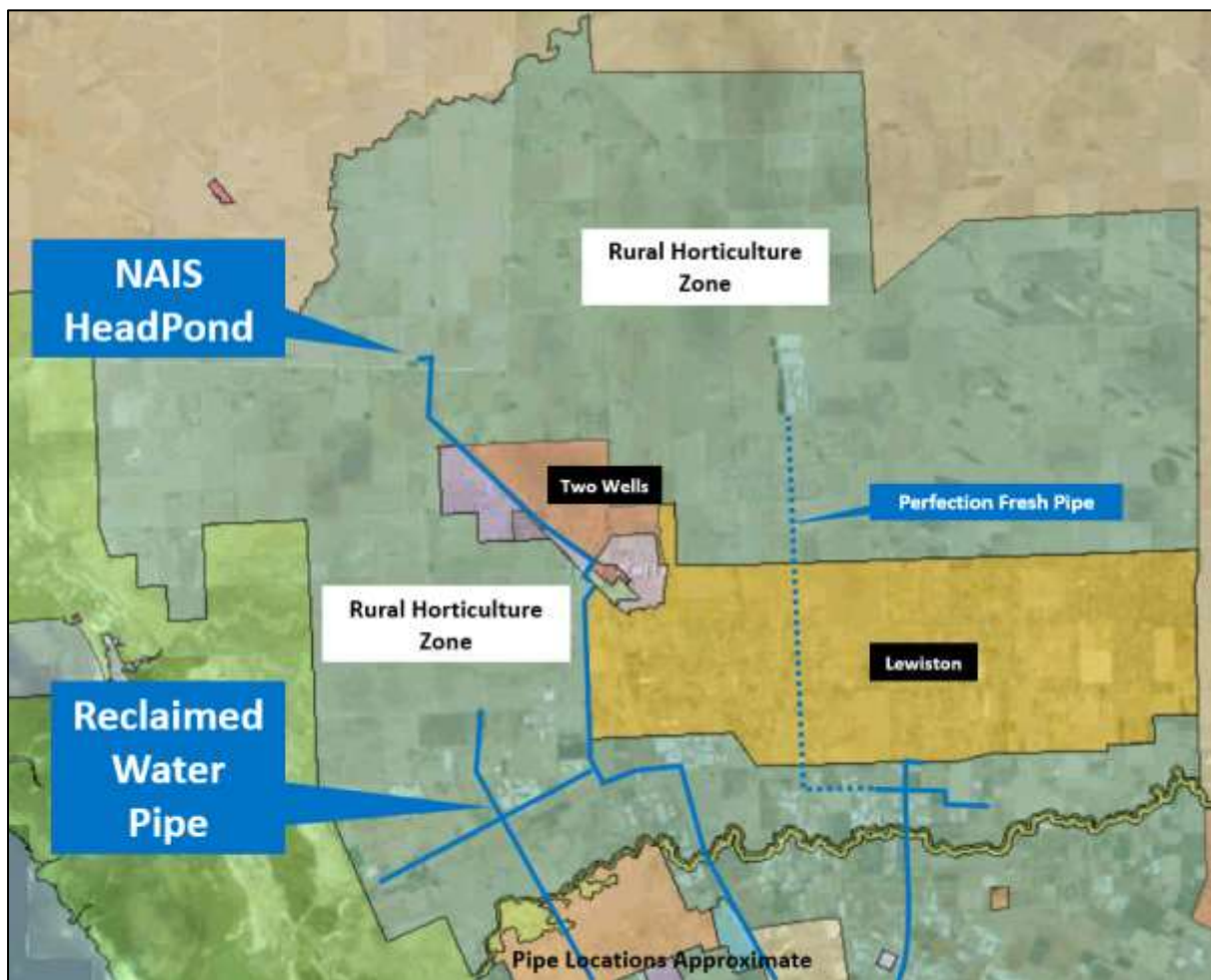
Conflict Between Agricultural Land Uses / Buffer Zones

As a peri-urban Council on the edge of a growing Greater Adelaide, Council is experiencing increasing potential for conflicts between different rural, agriculture and horticulture land uses e.g. broadacre cropping and horticulture.

Agri-business investment is continuing, growing local employment whilst diversifying through an increasing variety of agriculturally based land uses.

Planning and Design Code policy includes buffer or separation distances between different land uses. Buffer distances and activities excluded from being able to occur within that buffer have the potential to impact on the ongoing use of land.

Acknowledging current pricing challenges with the Northern Adelaide Irrigation Scheme, the extensive broadacre cropping areas between the Light River extending to the Gawler River are envisaged for further intense value adding agribusiness and horticultural investments. This land area is a key part of the Food Bowl intent in the 30 Year Plan for Greater Adelaide, and was subject to rezoning through the Northern Food Bowl Protection Areas Development Plan Amendment in 2018. It will be important that Planning and Design Code policy is up to date to address potential for land use conflict whilst maximising agricultural yield.



The Rural Horticulture Zone has a total area of 17,600 hectares

The Expert Panel is advised of increasing risk of land use conflict between envisaged diversification of agricultural uses within established broad acre farming areas.

The Expert Panel is requested to identify a review is required of buffer and separation distances within the Planning and Design Code.

EPLANNING AND PLANSA

Development Assessment Portal

The Local Government Assessment Manager Forum submission (**Appendix B**) supports the Expert Panel's observation that there should be a review of the Development Assessment Portal (DAP).

The submission states 'It is essential that urgent enhancements are prioritised as the current DAP limitations are significantly affecting the performance of the development assessment process.'

'Given the critical role of the DAP in the system, the Expert Panel is requested to review the governance and resourcing that is necessary to sustain the DAP. There appears to be an inherent limitation with the current governance model of PlanSA determining and progressing enhancements. While there have been many enhancements, acknowledging the efforts of the department to address what they can, there remain many more that are outstanding.'

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the governance and resourcing that is necessary to sustain the Development Assessment Portal.

Verification

The Local Government Assessment Manager Forum submission (**Appendix B**) outlines:

- The verification process of information lodged with a development application under the PDI Act is much more resource intensive.
- The increased requirements are not equally placed on an applicant to submit a complete development application.
- The system fails to account for the nuanced link between requesting full information from an applicant and the relevant authority advising the applicant at an early stage that changes are required to the proposal.
- The importance of understanding contextual information, such as COVID government stimulus, influencing processing time metric data from the Development Assessment Portal.
- A request for the Expert Panel to consider training for all participants in the industry, education, and DAP system solutions, ahead of imposing penalties on the local government sector that is facing the same resourcing challenges as other sectors.

On the basis of the Local Government Assessment Manager Forum's submission to the Expert Panel, Council supports a review of the approach to verification of information submitted for development applications and the use of data from the Development Assessment Portal.

ENVIRONMENT AND FOOD PRODUCTION AREAS REVIEW



- **Submission to State Planning Commission**

July 2021

Contents

SCOPE OF REVIEW	15
ABOUT THE EFPA.....	16
OBSERVATIONS	18
EFPA Generally Aligns with Strategic Goals of Adelaide Plains.....	18
EFPA Not Allowing Housing with Horse Keeping or Dog Kennelling Needs Review	20
EFPA Rules Not being reflected in the Planning and Design Code is Discordant and Needs Immediate Change	22
EFPA Rural Living Settlement Employment Needs Review.....	23
Two Wells Planned Urban Growth Challenges and Opportunities.....	37
Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land	42

Council acknowledges that we are on the traditional country of the Kurna people of the Adelaide Plains and pays respect to elders past, present and emerging. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kurna people living today.

Adopted by Council 26 July 2021

Scope of Review



The vast majority of land in Adelaide Plains is impacted by the EFPA

Adelaide Plains Council (Council) acknowledges the opportunity to provide input to the Commission with respect to the Environment and Food Production Areas (EFPA) Review.

The Commission is satisfied there is sufficient supply of land across Greater Adelaide to support housing and employment growth over the next 15 years. Therefore, the Commission's review is confined only to consideration of variations to the boundary which are trivial in nature and will address a recognised anomaly².

Comment to Commission:

The matters raised in Council' submission fit within the EFPA review scope of being a recognised anomaly or trivial in nature.

² The Planning, Development and Infrastructure Act 2016 sets out that when considering any proposed variances to the EFPA, the Commission must be satisfied with the following tests:

- Test 1: area/s within Greater Adelaide outside the EFPA are unable to support the principle of urban renewal and consolidation of existing urban areas, and
- Test 2: adequate provision cannot be made within Greater Adelaide outside the EFPA to accommodate housing and employment growth over a minimum 15-year period; or
- Test 3: variation is trivial in nature and will address a recognised anomaly.

About the EFPA

The EFPA³ has been introduced to achieve the following goals:

- Protect our valuable food producing and rural areas as well as conserving our prized natural landscapes, and tourism and environmental resources
- Support our sustainable growth and encourage the building of new homes in our existing urban footprint where supporting infrastructure already exists
- Provide more certainty to food and wine producers as well as developers on the direction of future development in metropolitan Adelaide.

These goals are given legal effect through the *Planning, Development and Infrastructure Act 2016* having a direct role in the ability to subdivide land for residential purposes within the EFPA. This is summarised below.

SUMMARY OF PDI ACT REQUIREMENTS FOR PROPOSED LAND DIVISION FOR RESIDENTIAL PURPOSES WITHIN THE EFPA	
Summary of Act	Implications
If the proposed development creates lots for residential development , the relevant authority must refuse development authorisation	Development proposing lots for residential purposes MUST be refused.
<p>If the proposed development creates 1 or more lots, a planning authority (such as CAP or staff under delegation), must not grant development authorisation unless the Commission concurs.</p> <p>If the Commission is the relevant authority, the Commission must not grant development authorisation unless the council concurs</p> <p>No appeal lies against a refusal to grant development authorisation</p> <p>Development authorisation is subject to the condition that the lots created will not be used for residential development.</p>	A planning authority's proposed decision to approve lots for non-residential purposes MUST be concurred with by the Commission and any approval IS SUBJECT to the condition that the lots not be used for residential purposes.
<p>Development proposing lots for the following purposes may be consented:</p> <ul style="list-style-type: none"> • dwelling for residential purposes on land used primarily for primary production. • hotel 	Dwelling with primary production, motel, hotel or other temporary residential accommodation can be considered regarding the Planning and Design Code.

³

plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_areas#have_your_say_on_the_efpa_review

<ul style="list-style-type: none"> • motel • any other form of temporary residential accommodation for valuable consideration 	<p>Primary production may not include horticulture, or animal husbandry depending on the specific nature of the activity</p>
<p>Land division for residential purposes able to be assessed during a transitional period that expired 31 March 2019</p>	<p>The two year period enabled divisions for residential purposes to be lodged. Such development applications are no longer possible.</p>

Frequently asked questions about the EFPA are available via [plan.sa.gov.au/_data/assets/pdf_file/0011/282935/FAQ - Environment and Food Production Areas.pdf](http://plan.sa.gov.au/_data/assets/pdf_file/0011/282935/FAQ_-_Environment_and_Food_Production_Areas.pdf)

Observations

Discussions with planning assessment staff and their experience of assisting customers understand how they can develop their land has informed Council's views about the EFPA.

EFPA Generally Aligns with Strategic Goals of Adelaide Plains

Council's Strategic Plan 2020 – 2024 identifies a vision for the Council area. How the EFPA relates to that vision is commented on below:

Vision	How EFPA aligns?
Adelaide Plains is:	
<p>Productive: A leading supplier of primary produce to local, national and international markets.</p> <p>Proximity to markets and natural growing conditions provide competitive advantages for primary producers on the Adelaide Plains that has seen our economy emerge as a key contributor to the region's prosperity.</p>	<p>EFPA aligns well with the primary production role of agricultural areas.</p>
<p>Diverse: A more diverse community with access to a greater mix of local opportunities.</p> <p>Increased employment, services and education attracts and retains a diverse community that chooses to live, learn and work in the region.</p>	<p>EFPA aligns well with the primary production role of agricultural areas, undergirding the suitability of these areas for related investment</p>
<p>Location: A lifestyle location connected to the Barossa, Coast and Adelaide.</p> <p>Adelaide Plains is a quiet community that offers residents time and space with convenient access to the benefits of Greater Adelaide, the coast and the Barossa region.</p>	<p>No clear alignment</p>
<p>Welcoming: A proud, spirited and generous community.</p> <p>This is a place that everyone belongs, where community connection and care is strong and someone is always available to help when a neighbour is in need.</p>	<p>No clear alignment</p>
<p>Ambition: Advancing infrastructure and technology to foster a competitive local economy.</p> <p>Modern practice, research and innovation, and efficient access to export centres and local markets builds an economic environment and reputation that rivals the State's major primary productions regions. With employment opportunities diversifying and new housing products in abundance, Adelaide Plains will become the place of choice for the Northern Adelaide Plains.</p>	<p>EFPA aligns well with the primary production role of agricultural areas, undergirding the suitability of these areas for related investment, including infrastructure and technology</p>

Vision	How EFPA aligns?
<p>Leadership: A decisive and proactive Council. Our Elected Members share a vision of prosperity founded on courage, robust deliberation, transparency and forward thinking and investing</p>	<p>Council has the opportunity every five years to deliberate about the EFPA and its alignment with the vision of the Council area</p>
<p>Attractive: A Place of choice for businesses, residents and visitors. Our townships are inviting, well cared for, filled with character and provide a range of services, facilities and accommodation that caters for all people and our landscapes, events and infrastructure provide memorable experiences.</p>	<p>EFPA aligns well with the suitability of townships for residential development, undergirding their role in providing services.</p> <p>This submission identifies observations about the EFPA that warrant review in order to ensure maximum alignment with Council’s vision.</p>

Comment to Commission:

The EFPA generally aligns with Council’s vision for Adelaide Plains as identified in the Strategic Plan 2020 - 2024, noting various matters require review and amendment.

EFPA Not Allowing Housing with Horse Keeping or Dog Kennelling Needs Review

The PDI Act allows subdivision for housing⁴ in the EFPA where it is directly associated with ‘primary production’.

Advice received is that ‘primary production’ does not include horse keeping or dog kennels as these uses, while agricultural in nature, do not result in the ‘production’ of a naturally occurring food or consumable item.

This means, for example, subdivision for a dwelling with horse keeping or dog kennelling triggers the EFPA whereas the same division for dwelling with primary production would not.

This presents a fundamental problem for the development of land in Zones where the Code envisages subdivision for dwellings with horse keeping or dog kennelling, such as the Rural Living Zone and Animal Husbandry Sub-Zone.

ZONES WHICH ENVISAGE SUBDIVISION FOR A DWELLING WITH HORSE KEEPING OR DOG KENNELING		
Zone	Dwelling with Horse Keeping	Dwelling with Dog Keeping
Animal Husbandry Sub Zone	Yes	Yes
Rural Living	Yes	Yes
Rural Horticulture	Yes	Less certain
Rural	Yes	Less certain

This is a particular problem with the Animal Husbandry Subzone. The prime purpose of the Zone is ‘Large-scale horse keeping and dog kennelling in association with detached dwellings on large allotments’⁵. This zone/sub-zone has been in place in the Mallala Development Plan and now Planning and Design Code for many years, and the character of the area is largely influenced by the many dog kennels, dog breeding and horse keeping land uses.

⁴ Section 7(18) of the *Planning Development and Infrastructure Act 2016* nominates that for the purposes of the EFPA, “‘residential development’ means development primarily for residential purposes but does not include— (a) the use of land for the purposes of a hotel or motel or to provide any other form of temporary residential accommodation for valuable consideration; or (b) a dwelling for residential purposes on land used primarily for primary production purposes.”

⁵ Planning and Design Code 2021

About the Two Wells Lewiston Animal Husbandry SubZone



The Animal Husbandry Subzone can be developed with large-scale horse keeping and dog kennelling in association with dwellings. The prime difference from Rural Living is the Animal Husbandry Zone explicitly provides for up to 20 dogs/lot (as Deemed to Satisfy) and unlike the Rural Living Zone, does not limit horses to two/lot.

This area of Two Wells/Lewiston has been planned – including through the SA planning system – for more than 30 years for animal husbandry and associated residential development.

Comment to Commission:

The Environment and Food Production Area not allowing subdivision for housing associated with horse keeping or dog kennelling, where it is consistent with zoning policy, requires immediate review and clarification.

The current statutory arrangements are limiting investment for envisaged development within the Animal Husbandry Subzone, Rural Living Zone, Rural Horticulture Zone and Rural Zone and causing confusion within the community.

EFPA Rules Not being reflected in the Planning and Design Code is Discordant and Needs Immediate Change

A land owner can read the Planning and Design Code and conclude Rural Living Zoned land can be subdivided for housing. However, nowhere does the Code say the land can-not be subdivided due to the EFPA.

This challenge can be called discordant and a policy misalignment. It also leads to poor outcomes for customers of the planning system who are trying to make informed investment decisions.

Council planning officers undertake innumerable conversations with people seeking to acquire property having to explain that whilst the Code says one thing, the EFPA says the opposite. This occurs for instance, in all Rural Living Zones, but is a particular issue in Two Wells/Lewiston Rural Living Zone, Animal Husbandry Subzone due to the large size of the area. This is not an ideal planning system.

The Planning and Design Code is emerging as a customer friendly and easily navigable digital statutory planning instrument. The Code is being used by landowners, investors, land agents, businesses, residents, developers and planners.

The Commission and PLUS's ongoing work fine-tuning the Planning and Design Code is supported.

Given the user value of the Planning and Design Code for certainty, the lack of the EFPA 'rules' being reflected directly in the Code needs change.

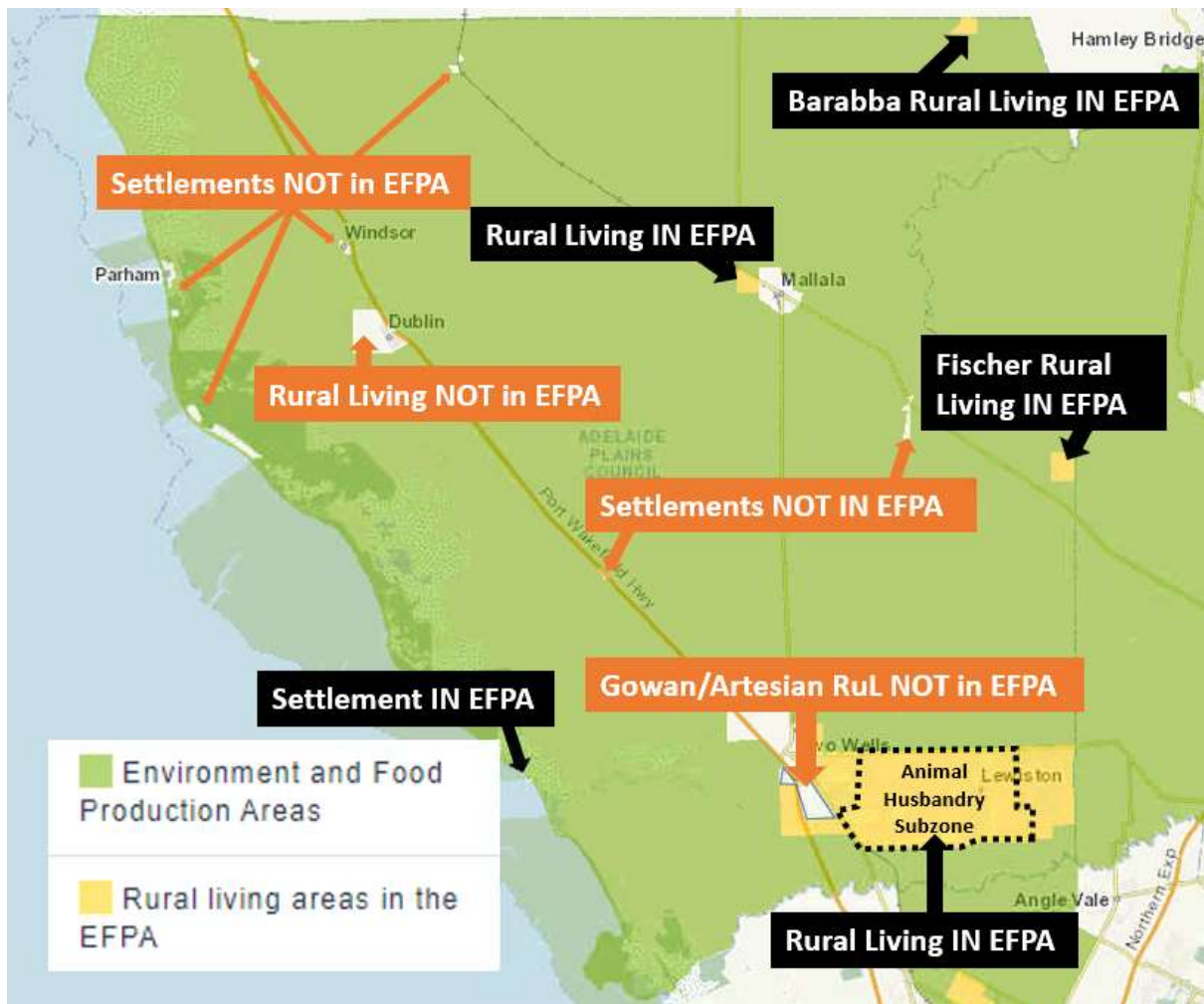
Comment to Commission:

The Environment and Food Production Area provisions should be explicitly communicated directly in the Planning and Design Code.

The current system providing for the Code to express one thing about land and the Environment and Food Production Area to express the opposite needs amendment.

The current arrangements are confusing and a handbrake on investment.

EFPA Rural Living Settlement Employment Needs Review



Zoning	IN the EFPA	NOT In the EFPA
Rural Living	Barabba, Mallala, Fischer, Two Wells, Lewiston	Dublin and Gower/Artesian
Settlements	Middle Beach	Wild Horse Plains, Long Plains, Windsor, Light, Redbanks, Parham, Webb Beach and Thompsons Beach
Employment Land	Part South West Mallala Part West of Two Wells Carslake Road Adjacent Mallala Raceway	Part South West Mallala Part West of Two Wells

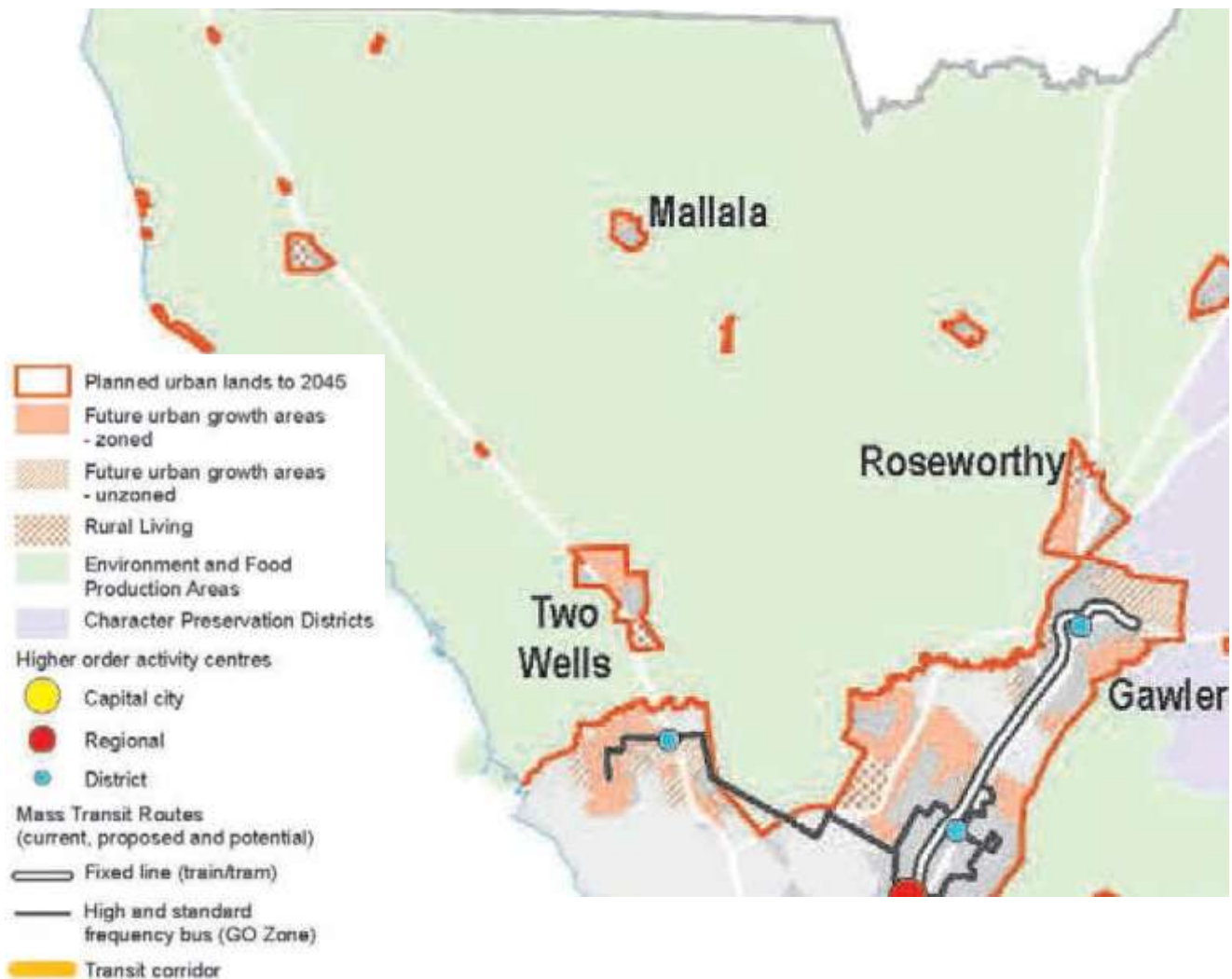


Rural Living Areas NOT included within the EFPA (being Dublin and Cowan/Artesian) seem to correlate with being planned as 'urban lands' in the 30 Year Plan for Greater Adelaide. Conversely, Rural Living Areas WITHIN the EFPA (e.g Mallala, Two Wells and Lewiston) seem to correlate with not being planned as 'urban lands' in the 30 Year Plan for Greater Adelaide.

Whilst the Rural Living Zone itself provides certainty that subdivision into 1HA lots for residential purposes is appropriate, the EFPA mandates that land division for residential purposes must NOT be approved.

Therefore Rural Living Zoned land within the EFPA is not able to be subdivided for housing alone, despite the intent of the zone in the Planning and Design Code. Existing lots can be developed for housing, or for other uses envisaged in the Rural Living Zone, but no further lots for residential/rural living purposes alone can be created. Further lots can be created for housing and primary production, or housing and some form of non-residential use. The current arrangement creates unnecessary conflict for applicants and authorities when it comes to attempting to divide parcels of land consistent with the intent of the zone.

Within the settlements, subject to the Planning and Design Code, subdivision for residential can obtain consent. Middle Beach is recognised as at greater inundation risk and various investigations have informed the risk management measures in place.



Map of the EPPA and Planned Urban Lands to 2045 - Map 3 30 Year Plan for Greater Adelaide

Comment to Commission:

The Environment and Food Production Area precluding the ability to build a dwelling on Rural Living zoned land has the potential to place pressure for urban development (housing) on primary production and horticulture zoned land. Council questions the rationale for the Environment and Food Production Area applying to Rural Living zoned land.

The below table provides background and analysis about each Rural Living Area

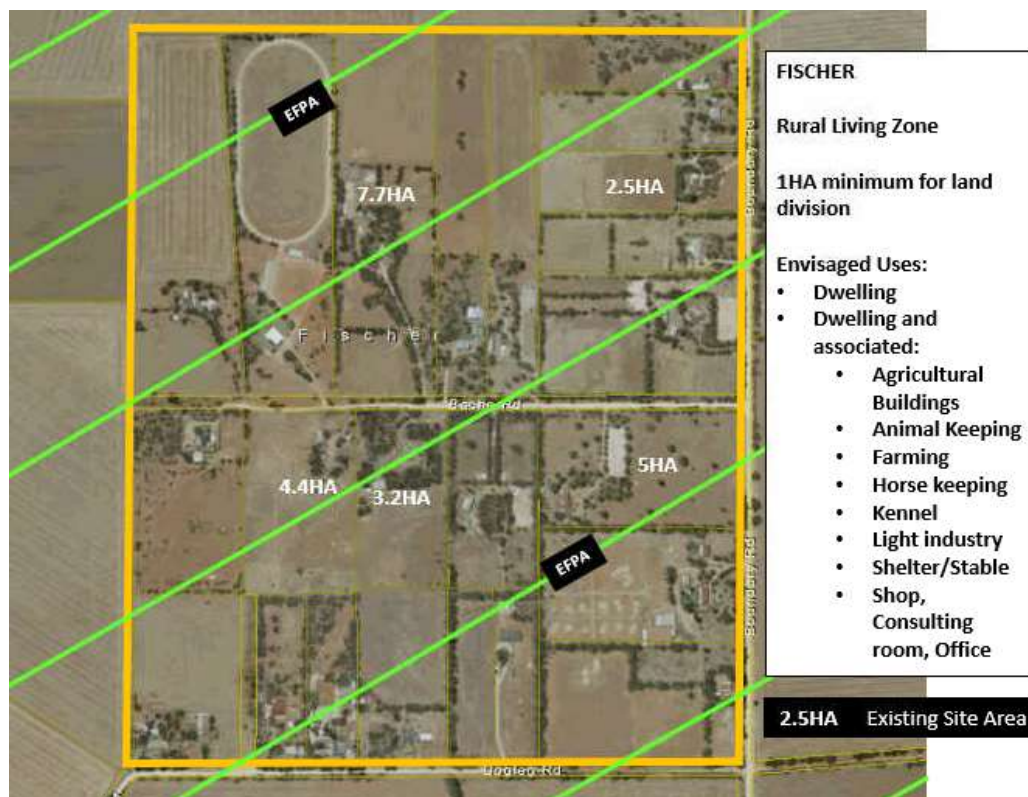
Rural Living - Employment – Settlement Zones EFPA Background

BARABBA



The EFPA limits potential residential subdivision into 1HA lots of the nine lots greater than 2HA

FISCHER



The EFPA limits potential residential subdivision into 1HA lots of approximately 18 lots greater than 2HA.

DUBLIN



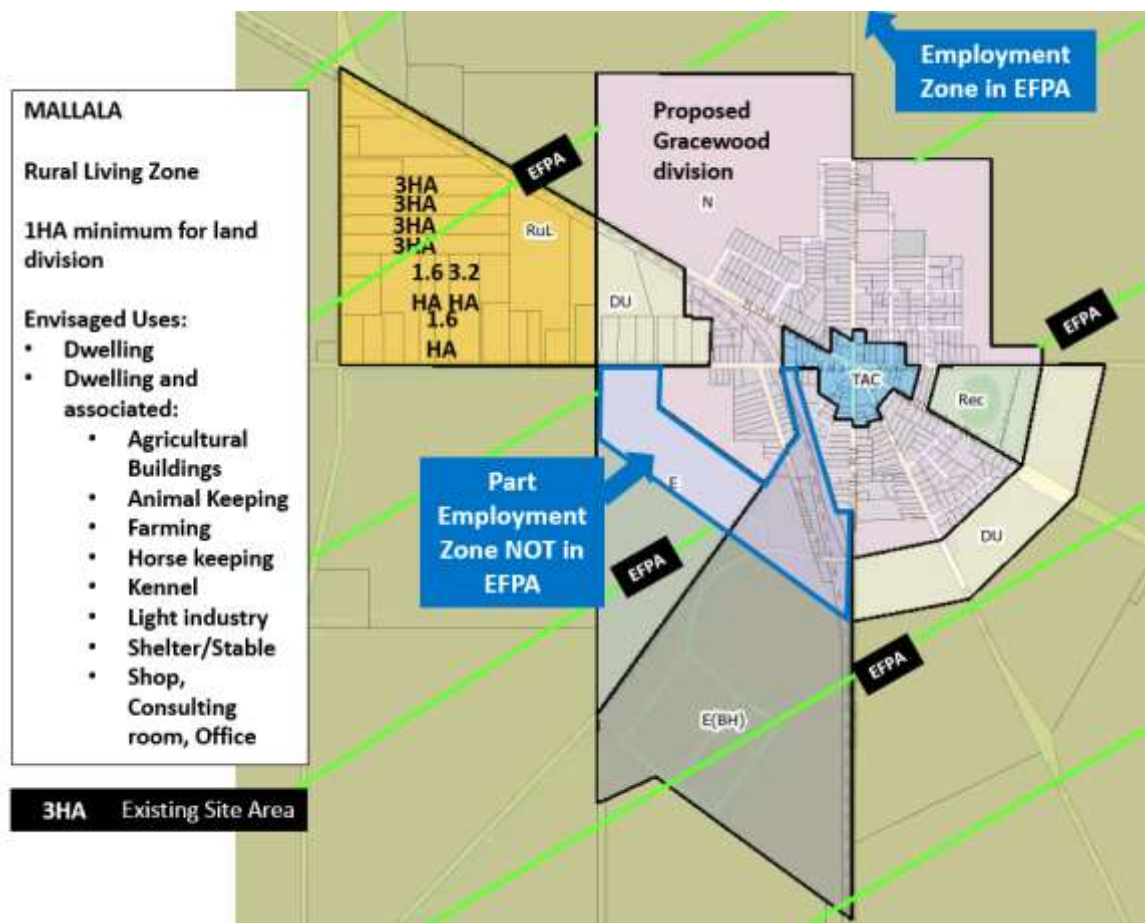
At Dublin, the EFPA does NOT apply. Some 20 lots are greater than 2HA and with potential for subdivision into 1HA lots for rural living (without an associated non-residential use) subject to assessment regarding the Planning and Design Code

Council provided an in-principle letter of support to Leinad Land Developments (Dublin) Pty Ltd (Attachment A) to advocate for boundary change to the EFPA. This letter arose from a Council decision of 23 September 2019:

“that Council, having considered Item 21.5 – *Environment and Food Production Areas*, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- 1) progress the review of relevant strategic holdings that are currently impacted by the *Environment and Food Production Areas* legislation with the *Department of Planning, Transport and Infrastructure* and the *State Planning Commission* as part of the 5 yearly review of the *Planning, Development and Infrastructure Act 2016 (Section 7)*.
- 2) provide in-principle letters of support to **Leinad Land Developments (Dublin) Pty Ltd** and the Hicks Group to enable both parties to advocate for boundary changes to the *Environment and Food Production Areas* and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report.”

MALLALA



In Mallala's Rural Living Zone, the EFPA limits potential residential subdivision into 1HA lots of approximately 12 lots greater than 2HA.

The Rural Living area is west of land zoned as Deferred Urban. The Deferred Urban Zoning holds the land for future urban development to be released through a future rezoning. The Deferred Urban zone was applied around 2015 to land formerly zoned Rural Living. This is also the case for Deferred Urban Land to the south east. The 2015 rezoning created a suitable zoning framework for the Gracewood development. Noting discussions are ongoing, Gracewood is yet to obtain a formal planning consent.

The employment zoned land to the south west is part in/part not the EFPA. Noting the EFPA precludes subdivision for housing, and noting other land available for this purpose, the EFPA poses no barrier. This is also the case for the land adjacent the Raceway

Comment to Commission:

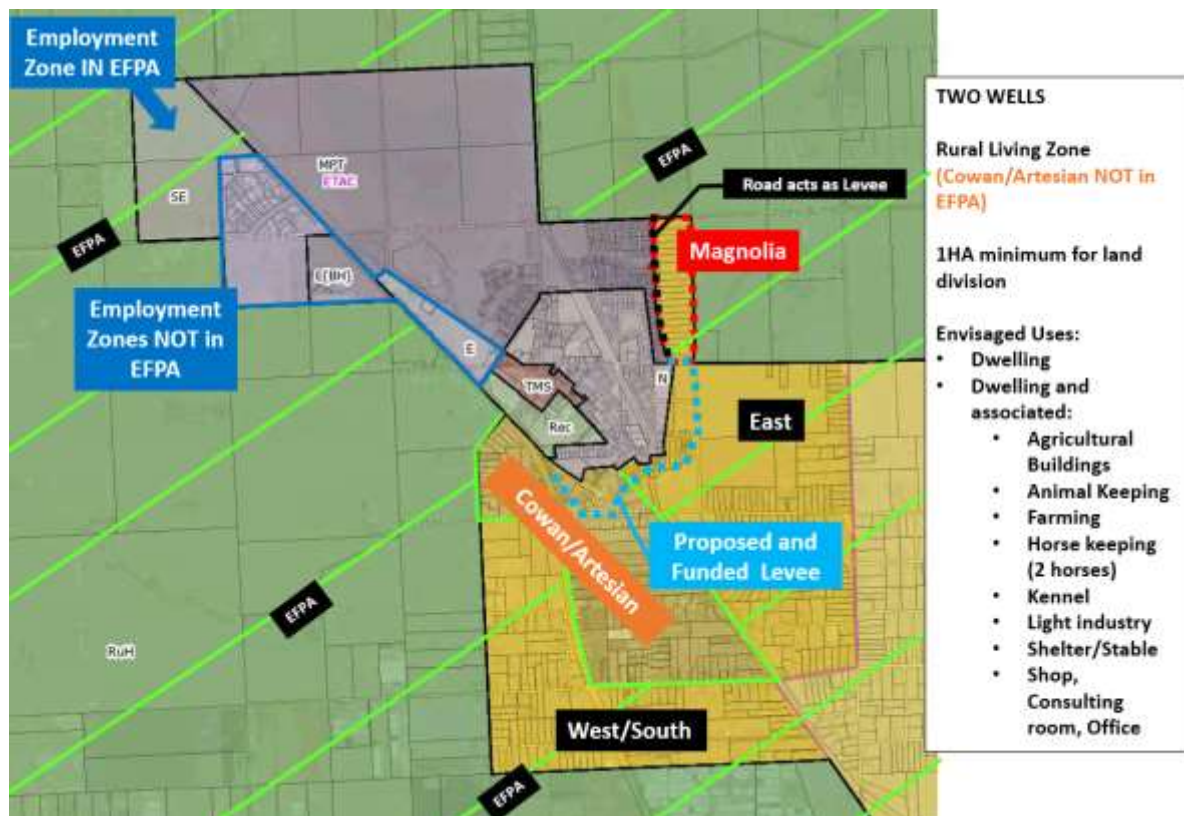
Council requests the EFPA be lifted from the Rural Living land

The rationale for not allowing subdivision for rural living is not clear.

Mallala's Rural Living Area has a similar siting to Dublin's Rural Living Area.

If the EFPA is lifted, it would allow subdivision for Rural Living, this being a different housing offer to other Zones in Mallala, and the anticipated housing forms in the Gracewood development.

TWO WELLS TOWNSHIP



The EFPA does NOT apply to the Cowan/Artesian part of the Rural Living Zone immediately south of Two Wells. This means subdivision for rural living (without an associated non-residential use) of numerous larger lots is possible subject to assessment regarding the Planning and Design Code.

A levee is proposed and funded east and south of Two Wells, and to be constructed over the next two years. The levee alignment is based on a key creek catchment flow. Outside the Cowan/Artesian area, and within the levee area, the EFPA limits potential residential subdivision of several larger lots and numerous lots around 1000sqm and greater. The EFPA should be lifted from within the Levee area as should also the Rural Living Zoning.

North of Gawler Road are Rural Living lots east of Magnolia Boulevard in the Eden development and being developed for housing. A stormwater easement is over part of the lots. Lots are 1 – 1.3HA aside from the Lot fronting Sharpe Road which is larger than 2HA. It's unclear what purpose the EFPA serves by applying and this should be reviewed.

The employment zoned land either side of Port Wakefield Road has the EFPA apply inconsistently. Given the EFPA's limit on residential subdivision, the rationale for this inconsistent approach is not apparent.

Council provided an in-principle letter of support to the Hicks Group (Attachment A) to advocate for boundary change to the EFPA. This letter arose from a Council decision of 23 September 2019:

“that Council, having considered Item 21.5 – *Environment and Food Production Areas*, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- 1) progress the review of relevant strategic holdings that are currently impacted by the *Environment and Food Production Areas* legislation with the *Department of Planning, Transport and Infrastructure* and the *State Planning Commission* as part of the 5 yearly review of the *Planning, Development and Infrastructure Act 2016 (Section 7)*.
- 2) provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report.”

Comment to Commission:

Rural Living Zoned Land

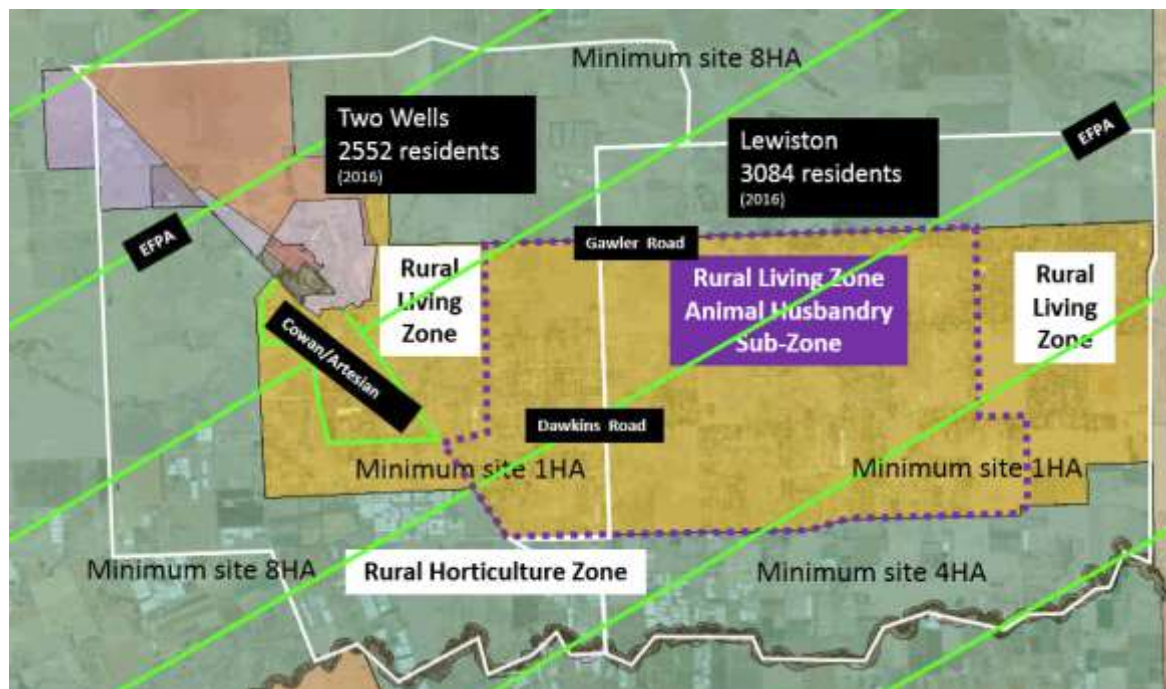
The EFPA applying within the area of the funded levee should be lifted. Council expresses interest in investigations commencing with respect to the Rural Living Zoning within this area.

Likewise, noting Magnolia Boulevard serves as a levee, the EFPA serves no purpose applying to land zoned Rural Living and being developed in that manner on the east side of Magnolia Boulevard. Council requests the EFPA be lifted from this area.

Employment Land

The application of the EFPA inconsistently to employment land either side of Port Wakefield Road should be reviewed. Noting the EFPA’s function to preclude subdivision for housing, and the envisaged significant residential growth of Two Wells, the potential need for this land for housing is not apparent whereas employment land for town based commercial, non-town centre uses is anticipated. On this basis, The Environment and Food Production Area should apply consistently to employment land on both sides of Port Wakefield Road at Two Wells.

TWO WELLS/LEWISTON RURAL LIVING AND ANIMAL HUSBANDRY



The EPA limits potential subdivision for rural purposes (without an associated non-residential use) of lots larger than 2HA throughout Two Wells and Lewiston.

The Code envisages both the Animal Husbandry Sub Zone and Rural Living being able to be subdivided and developed for housing along with horse keeping, dog kennelling, horticulture, shop, consulting, offices and light industry. The Animal Husbandry Subzone can be developed with large-scale horse keeping and dog kennelling in association with dwellings.

Both the Rural Living Zone and Animal Husbandry sub-zone anticipate subdivision for residential development in its own right meaning applicants don't necessarily have to breed dogs or keep horses. Development can be purely for a rural residential lifestyle.

The prime difference from Rural Living is the Animal Husbandry Zone explicitly provides for up to 20 dogs/lot as Deemed to Satisfy and unlike the Rural Living Zone, does not limit horses to two/lot.

This area of Two Wells/Lewiston has been planned – including through the SA planning system – for more than 30 years for animal husbandry.



The Animal Husbandry Subzone envisages sites developed for housing with horse keeping or dog breeding businesses. Standalone Residential Living is also envisaged. Photo near Hams Park, Lewiston, May 2021



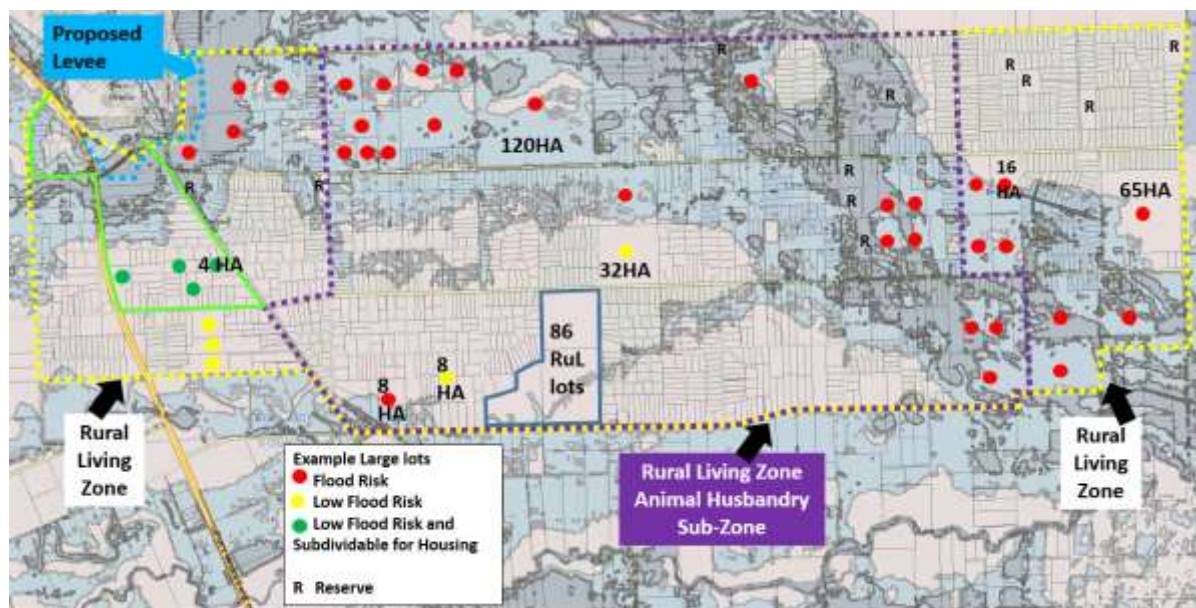
Rural Living Lots form Dunlop Boulevard, Lewiston, having been developed since 2015



Council made submissions in 2019 and 2020 to consultation on the draft Planning and Design Code (Code). With the operation of the Code from March 2021, this submission takes the opportunity to inform the Commission about the Council’s experience of the EFPA and the Code with respect to the Two Wells/Lewiston Rural Living and Animal Husbandry area.

Note 1: the barrier raised earlier about the EFPA limiting subdivision for low intensity residential living where associated with horse or dog keeping is assumed as being corrected.

Note 2: the lack of the EFPA being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone is assumed as being corrected.



Base Map SA Property and Planning Atlas 13 7 21

Two Wells Lewiston Larger Lots and Flood Risk

The Two Wells Lewiston Larger Lots and Flood Risk map shows:

- Flood risk impacts about half the area
- The red dots are 32 example large lots (typically larger than 8HA) impacted by flood risk
- The yellow dots are 2 example large lots with low flood risk
- Rural living lots are typically 20 times larger than the average suburban block.
- Remnant larger land holdings are mostly surrounded by 1 hectare land holdings.

- 86 rural living residential lots are being developed. These were lodged prior the EFPA limiting residential subdivision becoming operational in March 2019.
- There are several large lots able to be subdivided for residential rural living in the Cowan/Artesian area
- Excluding the Cowan/Artesian area, Rural Living (including Animal Husbandry) comprises 34 square kilometres.

Whilst the Planning and Design Code envisages the Rural Living and Animal Husbandry as being able to be subdivided to 1HA for housing, since March 2019, that is precluded by the EFPA.

Along with inquiries about subdivision for rural living in Two Wells/Lewiston's Rural Living Zone, Council's planners also receive numerous inquiries about building a house on 8HA lots in the Rural Horticulture Zone. Inquirers outline that land is hard to find in Lewiston. The extent that this is a risk for land in the Rural Horticulture Zone should be investigated. An inability to build a dwelling on Rural Living zoned land has the potential to place pressure on primary production and horticulture zoned land.

The EFPA's limit was introduced in 2019 after a period enabling residential subdivisions to be lodged, and subdivisions – including the 86 lot proposal - are yet to be brought to market.

The Cowan/Artesian Area is able to be subdivided for rural living housing, this presenting potential supply with several larger lots that could be subdivided over the next five years. Siting adjacent to Two Wells acts to reinforce the township.

Comment to Commission:

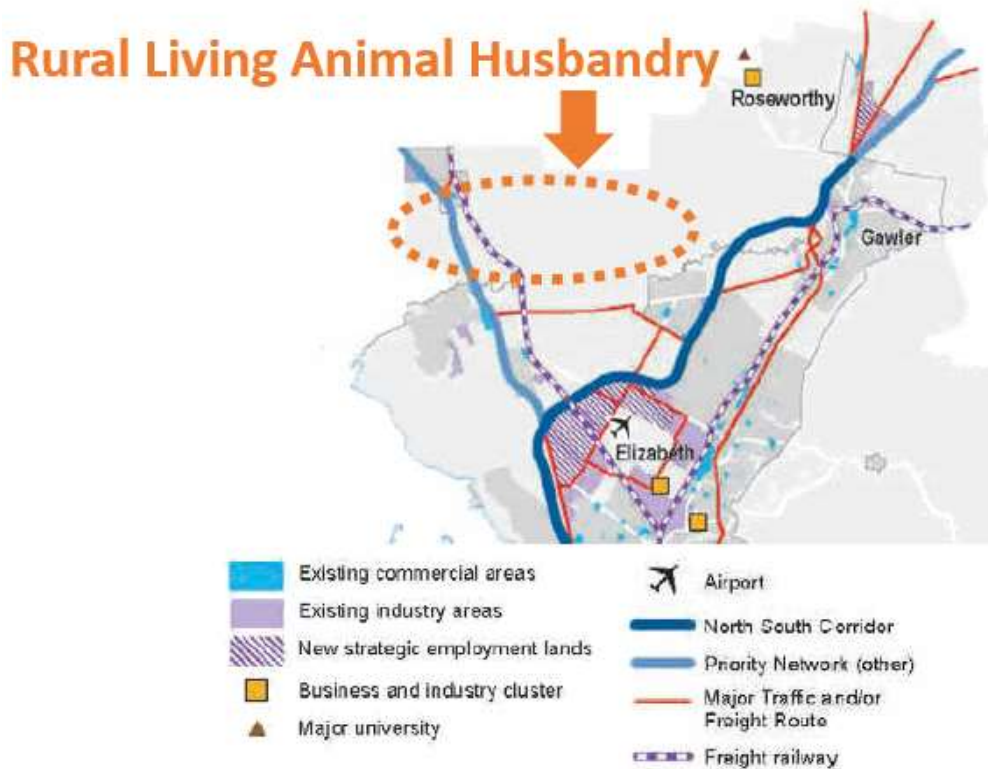
Council is open to the Environment and Food Production Area continuing in place over Two Wells / Lewiston Rural Living Zone and Animal Husbandry Subzone until, noting further detailed investigations on the impact of the EFPA restrictions over time to be undertaken, subject to:

- The barrier of the Environment and Food Production Area limiting subdivision for low intensity residential living where associated with horse or dog keeping being corrected.**
- The lack of the Environment and Food Production Area being explicitly communicated directly in the Rural Living Zone and Animal Husbandry Subzone of the Planning and Design Code (perhaps as an Overlay) being corrected.**

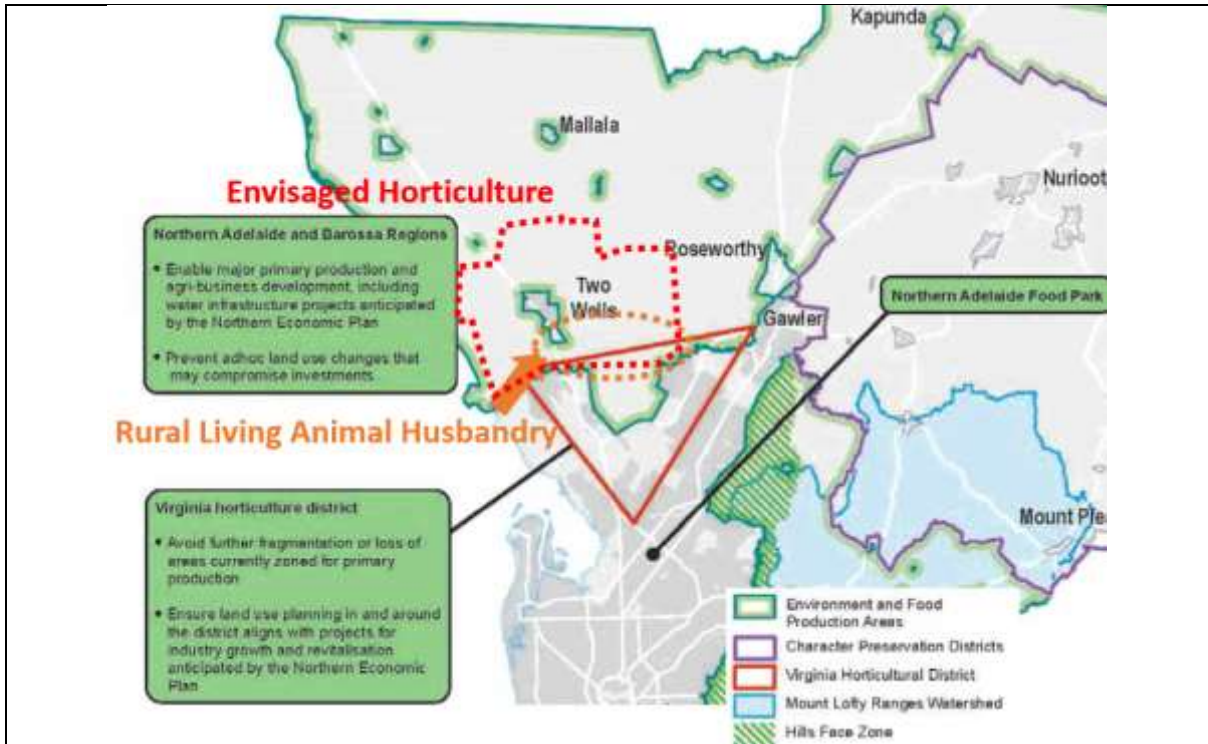
30 YEAR PLAN FOR GREATER ADELAIDE

The 30 Year Plan for Greater Adelaide includes the Rural Living Animal Husbandry Area within the EFPA. The 30 Year Plan is however silent about the areas business future and also the wider areas envisaged horticultural future.

Map 4 — Business and industry clusters



The 30 Year Plan is silent about the Animal Husbandry area as a form of business cluster



The 30 Year Plan is silent about the envisaged development of horticulture in the southern third of Adelaide Plains. This area is within a Rural Horticulture Zone

Comment to Commission:

The 30 Year Plan for Greater Adelaide should better reflect the Animal Husbandry Zone as a business cluster and the envisaged development of horticulture in the southern third of Adelaide Plains.

Two Wells Planned Urban Growth Challenges and Opportunities

A portion of Adelaide Plains including Two Wells is sited within the 'Outer North' of Greater Adelaide. Analysis of housing and employment land supply is contained within the Land Supply Reports⁶ for Greater Adelaide released by the Commission (see [Relevant Extracts for APC from the Land Supply Reports](#))

For Adelaide Plains, the land supply reports provide updated numbers associated with Two Wells housing estates. The commentary affirms the impact of the northern connector in terms of reduced vehicle travel times to Greater Adelaide underpinning demand for land for housing and employment purposes.

Building applications have increased from around 60/annum to above 100, with 2020/21 having 294 to the end of May. This is a significant rate of building activity.

Recognising the EFPA supports planned urban growth, it is suggested the following comments be provided to the Commission about planned urban growth

Comment to Commission:

Recognising the Environment and Food Production Area surrounds Two Wells' planned urban growth, Council intend to continue investigating, planning, delivering and advocating for the necessary economic and social infrastructure to support liveable growth at Two Wells. Council welcomes further dialogue with the Commission about this.

6

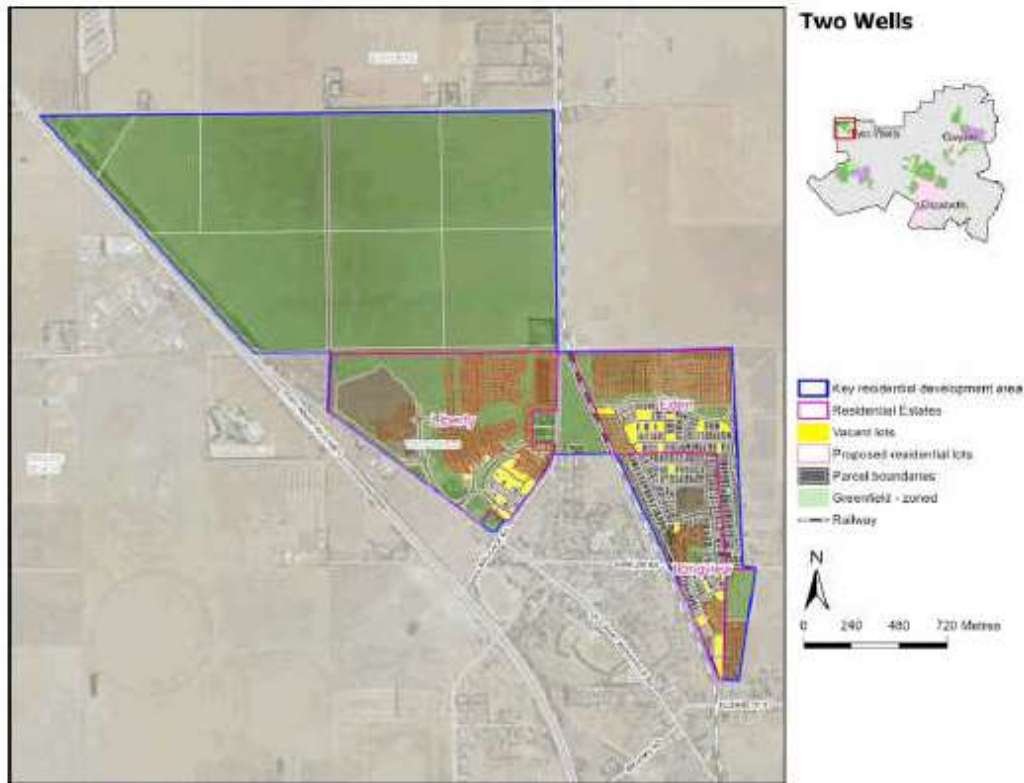
plan.sa.gov.au/our_planning_system/instruments/planning_instruments/environment_and_food_production_areas#have_your_say_on_the_efpa_review

Relevant Extracts for APC from the Land Supply Reports

Table 4: Greenfield land supply by sub-region and key development front - Outer North, June 2020

STATUS	DEVELOPMENT READY		UNDEVELOPED ZONED		FUTURE URBAN GROWTH AREA	
	Area (ha)	Lots	Area (ha)	Estimated Lots	Area (ha)	Estimated Lots
GAWLER						
Gawler East	180	1,521	3	29	-	-
Gawler South	18	151	58	490	-	-
Evanston Gardens	41	391	40	388	43	410
Evanston South	4	75	57	973	-	-
Roseworthy	102	871	237	2,030	29	248
Concordia	-	-	-	-	949	10,000
TOTAL	345	3,009	396	3,910	1,021	10,658
PLAYFORD						
Playford Alive	10	221	101	2,278	-	-
Playford North Extension	96	1,402	409	5,996	7	107
Munno Para	16	295	89	1,615	-	-
Munno Para West	13	205	15	234	-	-
Blakeview	7	123	289	5,360	-	-
Angle Vale	198	2,431	314	3,848	3	36
Eyre	10	165	82	1,305	-	-
TOTAL	350	4,842	1,299	20,635	10	143
VIRGINIA/TWO WELLS						
Virginia	59	723	103	1,250	301	3,663
Buckland Park	315	3,344	560	5,953	526	5,587
Two Wells	62	478	273	2,108	-	-
TOTAL	436	4,545	936	9,312	827	9,250
OUTER NORTH TOTAL	1,131	12,396	2,631	33,857	1,858	20,051

Figure 23: Two Wells



KEY MEASURES

Year Commenced	Pre-2010
Estimated dwelling capacity	2,875
Dwellings built since 2010	203
Average dwellings built per annum	19
Remaining Potential Capacity	2,672
Vacant lots	75
Development Ready (proposed lots)	478
Undeveloped Zoned	2,108

ANALYSIS

- 3 estates currently under development.
- Since 2018 the rate of development has markedly increased, with over 70 dwelling completions recorded in 2018.
- There are current infrastructure deed arrangements in place. The availability of financial contributions to fund infrastructure is dependent on the rate of development. This needs to be continually monitored to ensure infrastructure bottle necks do not occur.
- Two Wells is not connected to a SA Water trunk sewer main and currently relies on a community waste water scheme to service dwellings.
- SA Water’s potable water infrastructure is currently being upgraded in the area, including 4,500m of new pipework to improve water pressure and support projected growth.

2.4 Greenfield land supply to 2030

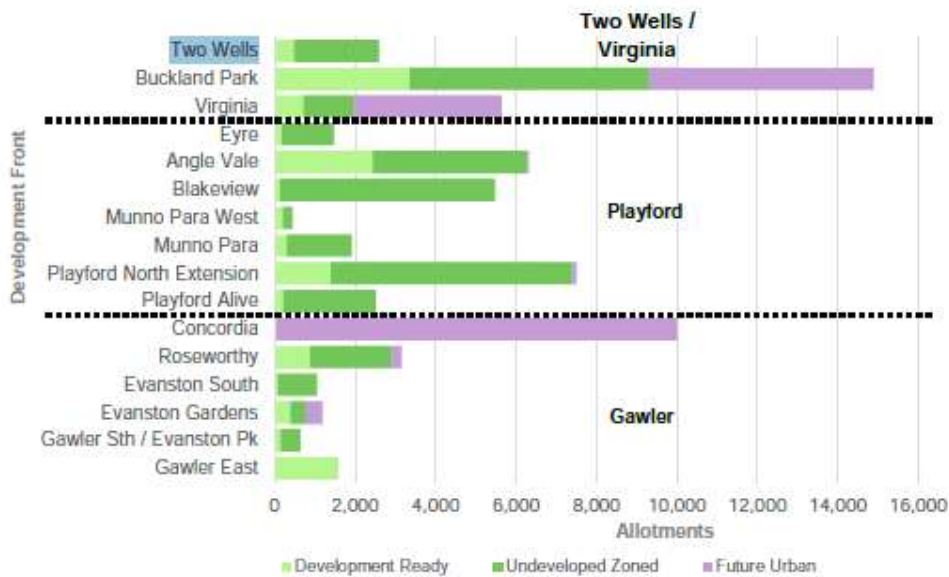


Over the last decade Greenfield development has accounted for 80% of all dwellings built in the region. This trend is assumed to continue into the next decade as additional land comes to the market and major infrastructure projects make land more accessible and desirable to a larger portion of the market.

A stocktake of Greenfield land supply within the region is illustrated in Figure 9 and Table 4, and shows the following:

- 19% of land supply is Development Ready.
- Over 5,400 Development Ready allotments are located within the Playford sub-region, with just under half these allotments located within the Angle Vale precinct.
- Over 50% of estimated allotment potential is located within Undeveloped Zoned land.
- It is estimated that undeveloped zoned land within the Playford sub-region could yield in excess of 20,000 allotments. The Playford North Extension will account for approximately 6,000 of these allotments.
- Future Urban Growth area land is estimated to yield 30% of total allotment potential for the region with land at Concordia estimated to have a total potential to create 10,000 allotments.

Figure 9: Greenfield land supply by development front, June 2020



2. EMPLOYMENT LAND SUPPLY – OUTER NORTH

2.1 Overview

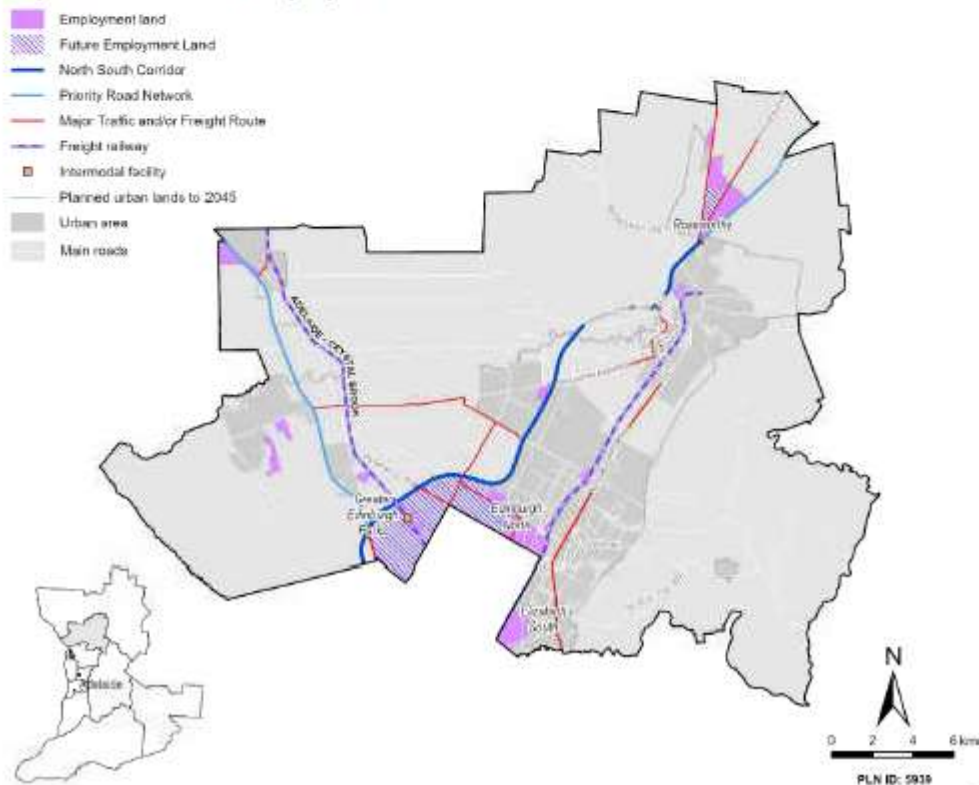


The Outer North region, as illustrated in Figure 11, accommodates an estimated 11% of total zoned employment land within Greater Adelaide and over 95% of all identified future employment land.

In 2020 it was estimated the regions zoned employment lands supported an estimated 5,500 jobs. Over 55% of these jobs were aligned with traditional employment activities, with manufacturing a significant contributor. Its share is projected to grow over the next ten years to 2030 as more land becomes available, and recently completed infrastructure makes land more accessible to key distribution networks and trade gateways.

Projected population growth in Two Wells, Gawler and Roseworthy will provide opportunities to facilitate growth of the regions employment lands driving demand for more population serving activities. This, along with further investigations into the future development of the Greater Edinburgh Parks, present the greatest opportunities for the region to over the next 10 years.

Figure 11: Outer North employment land overview



Attachment A Council Decision 23 Sept 2019 Hicks and Leinad Land



2a Wasleys Road
Mallala SA 5502
PO Box 18
Mallala SA 5502

Tel – 08 8527 0200
Fax – 08 8527 2242
info@apc.sa.gov.au
apc.sa.gov.au

ABN – 58 384 968 672

D19/50876

24 October 2019

BH and SA Hicks Pty Ltd
Mallala Road
TWO WELLS SA 5501

Dear Mr Hicks

In-Principle Council Support for North East Two Wells Expansion – Hicks Group

As you are aware, *Environment and Food Production Areas (EFPAs)* were introduced through the *Planning, Development and Infrastructure (PDI) Act 2016* to prohibit the further subdivision of land for housing to protect vital food and agricultural lands. The majority of the Adelaide Plains Council area is located within an EFPA and the effect of this legislation is to restrict land divisions for residential development to Council's main townships (Two Wells, Mallala and Dublin) and a number of other existing settlements only.

At an Informal Gathering on 25 March 2019, planning consultant Grazio Maiorano of URPS presented to Council Members on behalf of the Hicks Group in relation to the potential urban rezoning of land adjoining the Two Wells township in the medium to long term. The urban rezoning could facilitate approximately 850 new dwellings together with an appropriate level of recreation, open space and community facilities.

As you are aware, an amendment to the EFPA boundaries will be necessary before a potential rezoning and future development application can be progressed for this development proposal.

Following a formal request by the Hicks Group, as well as a separate request from Leinad Land Developments (Dublin) Pty Ltd, regarding a potential expansion of the Dublin township, Council at its Ordinary Meeting on 23 September 2019, resolved as follows:-

Item 21.5: *Environment and Food Production Areas*

Moved Councillor Maiolo Seconded Councillor Lush 2019/412

“that Council, having considered Item 21.5 – Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- 1) *progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and Infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and Infrastructure Act 2016 (Section 7).*
- 2) *provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the*

Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report.”

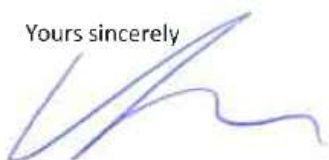
CARRIED UNANIMOUSLY

As per Council Resolution 2019/412 above, Adelaide Plains Council is pleased to provide in-principle support to the Hicks Group to advocate for boundary changes to the EFPA to allow for the future progression of long term rezoning objectives for the North East Two Wells expansion.

Subject to availability, Council staff will be keen to attend meetings with Grazio Maiorano of URPS and the Department of Planning, Transport and Infrastructure to progress this matter.

If you require any further information, please contact Rob Veitch, General Manager Development and Community on (08) 8527 0200 or rveitch@apc.sa.gov.au

Yours sincerely



James Miller
Chief Executive Officer

D19/50832

24 October 2019

Mr Daniel Palumbo
Leinad Land Developments (Dublin) Pty Ltd
55 Stanbel Road
SALISBURY PLAINS SA 5109

Dear Mr Palumbo,

Dublin Township Expansion – Leinad Land Developments

As you are aware, *Environment and Food Production Areas (EFPAs)* were introduced through the *Planning, Development and Infrastructure (PDI) Act 2016* to prohibit the further subdivision of land for housing to protect vital food and agricultural lands. The majority of the Adelaide Plains Council area is located within an EFPA and the effect of this legislation is to restrict land divisions for residential development to Council's main townships (Two Wells, Mallala and Dublin) and a number of other existing settlements only.

The potential expansion of the Dublin township was previously supported by Council back in 2014, when Leinad Land Developments proposed a developer-led Development Plan Amendment (DPA) to rezone land to the south of Dublin for residential purposes. Council endorsed the DPA together with a Funding Deed to finance the DPA. However, the DPA Statement of Intent (SOI) was rejected by the then Minister for Planning, the Hon. John Rau, on 20 February 2015 as the proposals were not considered to be in accordance with the State Planning Strategy at that time.

The DPA was intrinsically linked to a proposal for the construction of a local shopping centre at Dublin comprising 1700 square metres of gross floor area, including a small supermarket and five speciality shops. Development Plan Consent was granted for the shopping centre on 12 November 2015 and the operative period of this Development Plan Consent remains 'live' until 4 August 2020.

Since the granting of the Development Plan Consent and the rejection of the DPA, the introduction of the EFPA legislation through the 2016 PDI Act has prevented any further progress on the development proposals from occurring.

Following a presentation by planning consultant Richard Dwyer of Ekistics to Council Members on behalf of Leinad Land Development on 8 July 2019, a Motion on Notice was made at the Ordinary Council Meeting on 22 July 2019, which resulted in the following resolution:-

Environment Food Production Areas

Moved Councillor Keen Seconded Councillor Lush 2019/323

“that the Chief Executive Officer formally write to the Department of Planning, Transport and Infrastructure and the Minister for Planning to give advanced notice of Adelaide Plains Council’s desire to have strategic holdings reviewed throughout the Council area as part of the imminent Environment Food Production Areas review process.”

CARRIED

As per the above resolution, I wrote to the Hon. Stephen Knoll MP, Minister for Transport, Infrastructure and Local Government on 23 July 2019. To date, no reply has been received.

Following formal requests by both Leinad Land Developments, as well as the Hicks Group regarding a potential development at Two Wells, Council at its Ordinary Meeting on 23 September 2019, resolved as follows:-

Item 21.5: Environment and Food Production Areas

Moved Councillor Maiolo Seconded Councillor Lush 2019/412

“that Council, having considered Item 21.5 – Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- 1) progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and Infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and Infrastructure Act 2016 (Section 7).*
- 2) provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report.”*

CARRIED UNANIMOUSLY

As per Council Resolutions 2019/323 and 2019/412 above, Adelaide Plains Council is pleased to provide in-principle support to Leinad Land Developments to advocate for boundary changes to the EFPA to allow for the future progression of long term rezoning objectives for the expansion of the Dublin township.

If you require any further information, please contact Rob Veitch, General Manager Development and Community on (08) 8527 0200 or rveitch@apc.sa.gov.au

Yours sincerely



James Miller
Chief Executive Officer

Appendix B Local Government Assessment Manager Forum November Submission

18 November 2022

Mr John Stimson
Presiding Member
Expert Panel
Planning System Implementation Review

DTI.PlanningReview@sa.gov.au

Dear Mr Stimson

This submission is made by the recently formed Local Government Assessment Manager Forum (LGAMF). The LGAMF represents Accredited Professionals (Level 1) employed in the Local Government sector who perform the duties as an Assessment Manager.

As a key group of accredited professionals within the planning system, the members of the LGAMF has a strong interest in facilitating the delivering a system that serves the diverse needs of the community. The LGAMF acknowledged the significant effort of the department in transitioning the State to the new system. There is general support for the reforms. This submission is focussed on specific matters of interest to the LGAMF that are considered to require further consideration in development assessment.

The LGAMF welcomes the opportunity to work with the Expert Panel to further enhance the planning and development system. In particular, the LGAMF request the Expert Panel consider the following matters.

- Deemed Planning Consents
- Deemed Development Approvals / Minor variations
- Assessment Timeframes
- Development Assessment Portal
- Verification

Deemed Planning Consent

The need for an efficient and responsive development assessment process is supported. However, the Deemed Planning Consent provision is having extremely negative impacts on workplace culture, and contributing to staff leaving the local government sector. This, combined with very short assessment times for what can be quite complex matters, results in a greater likelihood of applications being refused, or substandard designs that do not meet the provisions but are just good enough being approved to avoid a deemed consent rather than working with applicants to achieve a design that can be supported to better deliver the intent of the policy. This is inconsistent with the objects of the Act to promote *high standards for the built*

environment. It is a severe penalty that does not adequately consider the consequences for the community for development that is inappropriate.

It is noted in the discussion paper there have not been many deemed planning consents issued. It is not the case that the number of those issued reflects the considerable stress that sits with every application to avoid this occurring. Planning staff do not feel they can take extended leave due to the potential that one of their applications will tick down to a deemed consent and the workloads associated with other planners in the team do not facilitate easy management of applications when others are away. Councils have had to take on more planning staff to keep workloads to a level that allow timely interaction with applications and does not result in time overruns to assess the same or similar application numbers overall to those managed with fewer planners under the Development Act.

Assessment Managers are of the view the deemed consent approach does not provide a basis for collaborative relationships with applicants that in turn deliver more appropriate planning outcomes. This provision does not take into consideration the well documented shortage of professionals within the sector and the challenges in establishing a sustainable work environment for the relevant assessing officers where they can apply their skills to the delivery of outcomes that benefit all, in line with the relevant assessment policy.

The consequence of this provision is to extend the assessment times for simpler development applications, as greater attention is required on the more complex developments that generally have the same assessment times. Furthermore, this is leading to less capacity to provide preliminary advice to applicants which is a highly valuable non-statutory service to assist applicants.

It is noted in the jurisdictional comparison contained in the Panel's discussion paper, only Queensland utilises this mechanism and New South Wales has adopted a deemed refusal mechanism. Other jurisdictions such as Victoria, Western Australia and Tasmania have taken **a more balanced approach, whereby a review is undertaken by the respective courts on the facts and the court makes a considered and independent determination on the application.** This is considered to be a more equitable approach that will safeguard the community against potential poor development outcomes while removing the risk of instant approvals for inappropriate outcomes.

Deemed Approval / Minor Variations

The discussion paper identifies instances where planning and building consent has been issued for a development application, but councils are not accepting the planning consent issued by the private accredited professional. The paper assumes the council as the *problem* and does not examine the reasons why the approval is not being issued by the council. The Act requires a council to check that the appropriate consents have been sought and obtained for a development application. This is an important mechanism that safeguards applicants / owners from commencing development with inconsistent or invalid consents. The absence of this important check is likely to result in non-compliances being identified during construction, leading to more significant and costly delays.

In many instances where development approval has not been issued, it is evident some private accredited professionals have acted outside their powers under the Act. This issue is directly related to the accredited professionals incorrect assessment which missed or dismissed key assessment criteria, including the application of Overlays such as the Historic Area Overlay. There are some examples of accredited professionals interpretation being such that they have effectively undertaken a performance assessed development, including on notifiable development.

This issue is exacerbated with the ambiguity that is created with s106(2) of the Act in relation to minor variations. The Deemed to Satisfy (Minor variations) is subject to various interpretations and has created uncertainty and delayed approvals, as identified by the Panel's discussion paper. This varying interpretation has resulted in poor outcomes for applicants. The difficulty with the interpretation was highlighted when a cross sector working group established by PLUS was unable to define what constitutes minor variations.

This legislative ambiguity is contributing to a tension between the practice of some private accredited professionals and council practitioners. **There needs to be greater guidance/training for relevant authorities on respective roles and what constitutes a minor variation for Deemed to Satisfy developments to address the current inconsistent approach.** This could be informed with clear parameters such as a minor variation may only be granted:

- by an Assessment Manager at council, or
- by privately certifiers where the element does not have an impact beyond the site. E.g. excludes site area, frontage, setbacks, building heights, length on boundary and the like; and there is accountability / transparency with clearly documented justification for any minor variations.

Assessment Timeframes

The discussion paper suggests a review of assessment timeframes. This review is supported as the current timeframes do not adequately differentiate the work that is required to properly assess more complex assessments such as larger commercial and industrial type applications. **It is recommended the assessment timeframes for complex development, not involving up to two (2) class 1 buildings or any class 10 buildings, should be 8 weeks** as the current assessment timeframes are not adequate and do not facilitate the promotion of high standards for the built environment. It is not reasonable to expect an application for 19 plus dwellings or large scale warehousing to be assessed in 20 days, yet this is currently the case. The Panel may wish to also consider the gross time for the completion of assessments to gauge the overall impact of the new system and whether there are broader legislative / DAP enhancements that may be necessary.

Development Assessment Portal

The Development Assessment Portal, while having developed some positive change, **has not yet delivered the efficiencies that were expected from the reform**, notwithstanding the many enhancements that have made since its introduction. The local government sector has contributed significant resources towards supporting the identification of issues and enhancements in the DAP. PlanSA has been provided with an extensive list of issues and it is acknowledged the department has generally sought to progress enhancements. Critical changes are however urgently required, as the

Discussion Paper – *ePlanning System and PlanSA website Reform Options* has identified. **It is essential that urgent enhancements are prioritised as the current DAP limitations are significantly affecting the performance of the development assessment process.** For example:

- The current DAP is too linear and does not facilitate multi process actions across planning and building. Staff cannot easily update basic data, such as add addresses after verification or continue to assess an application when the application is on hold. This is resulting in double or triple handling of development applications. **A relevant authority should be able to efficiently complete all aspects of an assessment at one point, regardless of status of the application and should be given administrative control to change data in the DAP as required.** There is significant inefficiency in administrative functions being undertaken only by PlanSA.
- The current DAP is too complicated for simple development applications. **The DAP should be streamlined for simpler development applications and should allow authorities to concurrently assess planning consent, building consent, and issue development approval.**
- Assessment timeframes do not accurately capture when a request for information has been made – **the DAP should accurately measure the assessment time.**
- The system does not have a robust document management system, the current approach is convoluted and complicated. **A contemporary document management system should be adopted for the DAP to reduce the administrative burden for all users.** This should include generating emails within the DAP, which is a standard expectation of a contemporary digital solution.
- Dashboards to monitor volumes of work are not working and cannot be readily relied upon. **Dashboards should be provided to readily monitor and track development applications, without having to generate a PowerBI reports.**
- Reporting function is confusing and not accurate. **PowerBI Reporting should be simplified, accurate and relevant authorities should be given full access to all their data to generate bespoke reporting.**
- A large number of submitted proposals are not progressing past the submit stage, as required information is not provided and this is contributing to unnecessary burden on the system. **Submitted proposals, where required information has not been provided during verification, should be withdrawn by the system automatically after a certain period of time and applicants should reodge when ready to proceed.**

Given the critical role of the DAP in the system, the Expert Panel is requested to **review the governance and resourcing that is necessary to sustain the DAP.** There appears to be an inherent limitation with the current governance model of PlanSA determining and progressing enhancements. While there have been many enhancements, acknowledging the efforts of the department to address what they can, there remain many more that are outstanding. As the current governance model requires all ideas to be funnelled through PlanSA and prioritisation of enhancements need to fit within the available resources & understanding of the issues by the department, the most common problems are the focus, not innovation.

The DAP should offer full Application Programming Interface (API) Based Product Integration (open data) so that authorities and other relevant stakeholders can move towards business to business transactions. This will facilitate innovation as it will incentivise authorities to evolve their business processes and the learning can be shared across all stakeholders. Enabling all stakeholders to shape direction and priorities of the core DAP functionality, together with the full API based Product Integration the DAP could realise its full potential as a digital platform.

Crown development applications should also be processed within the DAP as working between two systems is inefficient, overly complex and is likely to result in errors. It is also confusing for customers who do not understand why there are still two systems in place. Crown developments were due to be included in the DAP by mid-2022.

Verification

Unlike the previous requirement under Development Act, **the Verification process under the PDI Act is much more resource intensive. The increased requirements are not equally placed on an applicant to submit a complete development application** – the DAP does not prevent incomplete applications from being submitted. Therefore, all the expectation is placed on the relevant authority. Furthermore, the resource intensive process is exacerbated when an applicant provides a partial response to a request for information to form a complete application. This is double, triple handling of the application. The consequence is that greater attention is required on the more complex developments and simpler developments take longer to process.

The system also fails to account for the nuanced link between requesting from an applicant the full documentation for an application, when at a preliminary stage, it is apparent the development proposed will not be supported in that form. Providing relevant authorities the time to provide a preliminary guidance to an applicant early, will save the applicant time and money. This is particularly relevant for more complex development applications. Not providing advice about significant issues but seeking possibly expensive technical mandatory information only to then advise after lodgement has occurred that there are significant concerns does not build a constructive relationship and often leads to complaints about staff action.

The Expert Panel is invited to also consider that the data collected to form its initial perceptions of verification was over a period of extraordinary development activity as a result of government stimulus to facilitate construction activity during peak Covid-19. Some Councils experienced over a 30% increase in development applications in this period while at the same time many workplaces were required to adapt to significant changes, lock downs and loss of staff due to isolation rules. There were also many instances where new lots from approved land divisions were not created in the DAP and applications could not proceed past the verification stage. Further it is not uncommon for applicants to submit applications for new housing reliant on lots and roads that have not been approved in a land division and these may then need to wait longer before they can be verified and submitted. In this context, 84 percent of verifications within time is considered to be reasonable. The suggestion of penalty in the context of the environment at the time of the data collection is not considered reasonable. It is likely to lead to more refusals.

Moreover, it would also seem appropriate to explore the data from the DAP in more detail to determine if the applications that fell outside the 5 days were verified on day 6 or 7; or was this an issue for a particular application type or region; or how affected were these authorities by Covid-19; or was the timeframe due to the poor quality information submitted with the application. A more complete understanding of the issues behind the headline metric is warranted. Furthermore, **the Expert Panel is encouraged to consider training for all participants in the industry, education, and DAP system solutions, ahead of imposing penalties on a sector that is facing the same resourcing challenges as other sectors.**

The proposal within the *E-Planning System and the Plan SA website* paper to explore combined verification and assessment processes and to remove Building Consent verification for simpler applications has merit and warrants further consideration.

Local Policy

It is recommended the Expert Panel also give consideration to the inclusion of additional local policy in the Code. The announced changes to heritage and character to bring strong controls is welcomed and this initiative should be extended to consider other policy gaps / deficiencies in the Code that have been identified by various stakeholders.

Local Government Assessment Manager Forum

Appendix C Council Submission on Phase 3 Draft Code December 2020

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>Master Planned Neighbourhood Zone</p>	
<p>Council raised concerns with the 2019 draft Code relating to a change of the existing Suburban Neighbourhood Zone and Residential Zone – Residential Policy Area 4 to the General Neighbourhood Zone.</p> <p>The 2020 draft Code now proposes to transition the existing residential areas predominately to the Master Planned Neighbourhood Zone. This zoning will apply to the Liberty & Eden land developments. A new Emerging Activity Centre Subzone is also proposed over the Liberty development.</p> <p>The proposed Master Planned Neighbourhood Zone does not suitably address the minimum site areas prescribed within the existing Mallala Development Plan. Emphasis is placed on broad statements rather than quantitative allotment sizes.</p> <p>The Zone currently does not use any Technical Numeric Variations (TNVs) to carry over existing Development Plan criteria, but rather references criteria contained within ‘Building Envelope Plans’ that can be created as part of these master planned areas. If a Building Envelope Plan does not exist, then standardised broad policies are provided.</p> <p>It is also recognised that the existing and planned infrastructure (power, water and waste water) have all been designed to accommodate a certain number of houses within the development area. The Two Wells Residential DPA of 2013 introduced this policy framework to ensure that the minimum site areas adequately cater for the overall dwelling and associated infrastructure demands.</p>	<p>It is recommended that a Minimum Site Area TNV and Minimum Frontage TNV be inserted into the Zone to appropriately guide development within Adelaide Plains based on current Development Plan provisions.</p> <p>PO 11.1 / 11.2 / 11.3 – it is considered that the proposed Performance Outcomes do not suitably address the minimum site area and frontage requirements for residential development. As the majority of the area to the west of the existing railway line has not been developed and there is not an ‘authorised’ plan of division, there is concern that until this has occurred, the lack of site areas will create a high level of uncertainty for future development proposals.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations															
<p>A key component of the Master Planned Neighbourhood Zone and the transition from the existing Suburban Neighbourhood Zone and Residential Zone relies on appropriate criteria being contained within new POs and the proposed TNVs.</p>	<p>Site Areas and Frontage Widths</p> <p>Mallala Development Plan PDC 18 – A dwelling should have a minimum site area (and in the case of residential flat buildings, an average site area per dwelling) and a frontage to a public road not less than that shown in the following table:</p> <table border="1" data-bbox="1111 520 2078 959"> <thead> <tr> <th data-bbox="1111 520 1440 592">Dwelling Type</th> <th data-bbox="1440 520 1760 592">Minimum area (square metres)</th> <th data-bbox="1760 520 2078 592">Minimum frontage (metres)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1111 592 1440 703">Detached (except where constructed boundary to boundary)</td> <td data-bbox="1440 592 1760 703">250 minimum</td> <td data-bbox="1760 592 2078 703">7</td> </tr> <tr> <td data-bbox="1111 703 1440 740">Semi-detached</td> <td data-bbox="1440 703 1760 740">200 minimum</td> <td data-bbox="1760 703 2078 740">6</td> </tr> <tr> <td data-bbox="1111 740 1440 884">Row dwelling and detached dwelling constructed boundary to boundary</td> <td data-bbox="1440 740 1760 884">125 minimum</td> <td data-bbox="1760 740 2078 884">5</td> </tr> <tr> <td data-bbox="1111 884 1440 959">Group dwelling and/or Residential flat building</td> <td data-bbox="1440 884 1760 959">200 minimum</td> <td data-bbox="1760 884 2078 959">No minimum</td> </tr> </tbody> </table> <p>The Code does not suitably address the minimum site areas prescribed within the current Zone.</p> <p>Table 1 – Accepted Development</p> <p>‘Detached dwelling’, the ‘Interface Management Overlay’ should be applied as an exception, so that a dwelling is not an accepted development in certain areas. Concept Plan 99 – Two Wells clearly identifies two areas within the concept plan that are subject to interface with existing authorised land uses (shown as ‘Buffer to Primary Industry Activity’). This includes a 500m buffer to an intensive animal</p>	Dwelling Type	Minimum area (square metres)	Minimum frontage (metres)	Detached (except where constructed boundary to boundary)	250 minimum	7	Semi-detached	200 minimum	6	Row dwelling and detached dwelling constructed boundary to boundary	125 minimum	5	Group dwelling and/or Residential flat building	200 minimum	No minimum
Dwelling Type	Minimum area (square metres)	Minimum frontage (metres)														
Detached (except where constructed boundary to boundary)	250 minimum	7														
Semi-detached	200 minimum	6														
Row dwelling and detached dwelling constructed boundary to boundary	125 minimum	5														
Group dwelling and/or Residential flat building	200 minimum	No minimum														

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>keeping building associated with a poultry farm north of Tempy Road and a 300 metre buffer from an operational building/structures on the site of a grain storage and handling/packaging facility west of Port Wakefield Road.</p> <p>A Deed of Agreement was prepared between the former DPTI and Hikinbotham as it relates to the Liberty land development, with existing PDC and non-complying trigger the method in which the relevant authority was informed of this requirement. This matter requires further consideration as to how this many be transitioned into the Code. Council and Hikinbotham also have a Deed in place that relates to this development.</p> <p>PDC 24 within the current development plan states that:</p> <p style="padding-left: 40px;">“Land division should not create more than 1500 allotments within the zone, until the new road access to Port Wakefield Road as indicated on Concept Plan Map Mal/7 – Two Wells has been constructed.</p> <p>This has also been reflected in the non-complying provisions:</p> <p style="padding-left: 40px;">“Land division where the total number of allotments created in the zone exceeds 1500 -</p> <p style="padding-left: 40px;">Except where a new road access onto Port Wakefield Road has been constructed in accordance with Concept Plan Map Mal/7 – Two Wells”</p> <p>These policies were inserted into the Zone to reflect the number of additional allotments that could be created as part of the Two Wells development area without the need to undertake significant upgrades to the Port Wakefield Road access. It is acknowledged that the Concept Plan 99 shows the new road access, however the Code should also include a provision to reinforce this intent.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>Of primary concern within Adelaide Plains Council is that while the provisions of the Master Planned Neighbourhood Zone seek to limit retail within the zone, the Emerging Activity Centre sub-zone does not have the same limitations, in fact it has no retail floor area size limits. In the Two Wells setting this could result in a retail centre being located anywhere in the Liberty development in direct competition to the Two Wells Main Street. While the introduction of the Master Planned Neighbourhood Zone is broadly supported, any policy that allows a significant out of town retail centre for Two Wells is not supported as it is directly opposed to the existing policy in the Development Plan that seeks to locate large retail within the Town Centre.</p> <p>This was a significant issue raised by the community and Council during the preparation of the Two Wells Residential DPA in 2013. The removal of this policy intent is considered to be a significant departure from the existing Development Plan provisions, is not supported by Council and requires amendment as a matter of high priority.</p>	<p>A new Gross Leasable Area TNV to ensure that a maximum gross leasable retail floor space is included within the Emerging Activity Centre Subzone. The creation of a Gross Leasable Area TNV with a maximum area of 500m² would reflect existing Objective 3 and PDC 21 of the Suburban Neighbourhood Zone (Mallala Development Plan) and ensure that any future development does not erode the role and function of the existing Two Wells Main Street (Town Centre).</p> <p>Alternatively and in the event that the Commission does not support the above recommendation, the Emerging Activity Centre Subzone needs to be substantially reduced in size and not applied over the entire Master Planned Neighbourhood Zone.</p> <p>PO 2.1 – Part (b) enables development to a height of 6 storeys or 22 metres. This is substantially higher than the current 4 storey maximum building height. It is recommended that Part (b) be reduced to 4 storeys to create greater consistency with existing Development Plan provisions and provide a more realistic expectation of the heights of buildings encouraged within activity centres.</p> <p>New Performance Outcome - It is recommended that the Concept Plan TNV be inserted within the Emerging Activity Centre Subzone to ensure that the non-residential component of Concept Plan 99 are reinforced and the appropriate siting and future sizing of an activity centre is addressed.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>Accepted pathway (no planning consent required) are proposed for new dwellings where they are consistent with an approved building envelope plan and retaining walls up to 1.5 metres in height (except where visible from a public road).</p> <p>The parameters for the approval and use of a Building Envelope Plan (BEP) have only just been released to local government and there is still some uncertainty as to how this new feature of the planning system will operate. What is not clear is why this element of the system is being introduced as part of the introduction of the Code, which was initially expressed as a 'like for like' policy change, and not following the introduction of the Code.</p>	<p>Council requests clarity as to what has prompted the introduction of BEP's and Accepted Pathway changes to be included as part of the introduction of the Planning and Design Code, which was intended to be limited to like for like policy not major structural changes to assessment processes.</p> <p>Fence and Retaining Wall Structure includes the following assessment criteria:</p> <ol style="list-style-type: none"> 1. The retaining wall retains a difference in ground levels not exceeding 1.5 metres (measured from the lower of the 2 adjoining finished ground levels). 2. The total combined height of the fence and retaining wall structure is less than 3.3 metres in height (measured from the lower of the 2 adjoining finished ground levels) 3. The structure is located behind the building line of the associated dwelling and any dwelling on adjoining land. 4. The structure is not located on a secondary street boundary. 5. The development will not be located within the extents of the River Murray 1956 Flood Level as delineated by the SA Property and Planning Atlas <p>It is considered that this a total combined height of the fence and retaining wall of less than 3.3 metres is too high to be considered as an Accepted Pathway. It is recommended that the 'Fence and Retaining Wall Structure' be removed from Table 1.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>Table 2 – Deemed-to-Satisfy Development Classification</p> <p>Carport, Dwelling (various types), Dwelling addition, Outbuilding and Verandah reference the Design General Development Provisions. Both Two Wells and Mallala are considered to be an ‘urban’ area and it is considered that these land uses should reference Design in Urban Areas General Development Provisions. (note Ancillary Accommodation references Design in Urban Areas)</p> <p>Detached dwelling – ‘Interface Management Overlay’ should be added in the Overlay column.</p> <p>Dwelling addition – should include reference to PO 1.1</p> <p>Table 3 – Performance Assessed Classification</p> <p>Carport, Dwellings (various types), Dwelling addition, Fence, Outbuilding, Retaining Wall and Verandah reference the Design General Development Provisions. Both Two Wells and Mallala are considered to be an ‘urban’ area and it is considered that these land uses should reference Design in Urban Areas General Development Provisions. (note Ancillary Accommodation references Design in Urban Areas)</p> <p>Table 4 – Restricted Development Classification</p> <p>There is only one land use included as restricted - a ‘Shop’ with three exclusions (less than 1000m², a restaurant or where located in an Activity Centre). Consistent with the recommendations for a number of suggested policy amendments to reference appropriate non-residential sized development, the proposed 1000m² is considered excessive and to give rise to a potential impact upon the existing retail areas contained within the main street of Two Wells.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	The shop exclusion should be reduced to match intended policy changes to the Emerging Activity Centre Sub-Zone.
Animal Husbandry Zone / Sub Zone	
<p>The revised Code proposes to accommodate the existing Animal Husbandry Zone in the current Development Plan through a sub-zone within the Rural Living Zone. Council was opposed to this approach in the 2019 version of the Code and requested a new Animal Husbandry Zone be included in the Code, based on the Mallala Development Plan Animal Husbandry Zone. This request was not supported by the State Planning Commission, and the sub-zone has been retained in the 2020 revision of the Code.</p> <p>Despite this there should be scope for revising/upgrading the sub-zone provisions with more of the existing Mallala Development Plan policy being incorporated since this is a unique, one-off sub-zone created specifically to accommodate Adelaide Plains.</p> <p>It is recommend that a series of changes are made to the proposed sub-zone including addressing the fact that horse and dog keeping and kennelling are proposed as notifiable development. Because of the clear purpose of the zone e.g. Animal Husbandry, this is an unusual policy response.</p>	<p>It is recommended that ‘animal keeping’, low intensity animal husbandry’ and ‘horse keeping’ should be listed as classes of development to be exempt from notification, subject to criteria that large scale horse keeping or dog kennelling proposals will undergo public consultation.</p> <p>We note that the South Australian Standards and Guidelines for Breeding and Trading Companion Animals defines a large facility as:</p> <p><i>Large facility means a facility with six or more pregnant or lactating dogs and/or cats at any one time or a facility which holds 30 or more dogs and/or cats at any one time.*</i></p> <p>This could be a useful and common definition that could be used as a trigger for public notice.</p> <p>Procedural Matters - Notification - ‘animal keeping’, ‘horse keeping’ and ‘low intensity animal husbandry’ be exempt from the notification process by being added to the class of development column as drafted in the revised version of the sub-zone, subject to a suitable tipping point being identified for larger scale applications to be publically notified.</p> <p>These land uses should also be added to the Notification section of the parent Rural Living Zone.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>Restricted Development - the 1,000sq m floor area threshold exclusion for a 'shop' is far too generous and the 2019 figure of 200m² should be reinserted.</p> <p>Proposed additions to the sub-zone prepared by Council, based on current Development Plan policy, are attached to this submission to provide a starting point for potential additional policy within the Code.</p> <p>* http://www.dogandcatboard.com.au/breeders-new-standards-and-guidelines/</p>
Flooding	
<p>Since the 2019 consultation on the Code, a new Flood Overlay has been introduced into the 2020 draft. This is to distinguish between areas of high/extreme flood risk and those that are exposed to a general risk. Whereas formerly, the Code had the Hazards (Flooding) Overlay to deal with all degrees of flooding risk, the revised Code now has a:</p> <ul style="list-style-type: none"> • Hazard (Flooding) Overlay - covering high risk areas; and • Hazard (Flooding - General) Overlay - covering areas of general flooding <p>The current Mallala Development Plan expresses flood policy via the Hazards module in the General section of the Plan and through the local policy additions inserted in its Flooding sub-section. The flood hazard areas are referenced along with minimum floor levels for buildings, gully traps and filling and driveway levels. These areas are defined in the Development Plan Overlay – Development Constraints series of maps. Development within the flood hazard risk areas shown in these maps is controlled through the flooding provisions referenced in the relevant</p>	<p>Introduce the Hazard (Flooding - General) Overlay into the classes of development column in all relevant zone Tables 1 (Accepted Development) and Tables 2 (DTS) where the Hazard (Flooding) Overlay is also referenced.</p> <p>Hazard (Flooding) Overlay - remove the DTS criteria in DTS/DPF 3.5 introduced into the 2020 Code (relating to carports and outbuildings) as being inappropriate in a high risk flood area and that the 300mm build-up requirement be rewritten as a Performance Outcome.</p> <p>Hazard (Flooding) Overlay - remove this DTS criteria in DTS/DPF 3.6 around post and wire fencing and allow all forms of fencing to be Performance Assessed.</p> <p>'Gully traps' to be referenced as part of the required 300mm build-up for buildings (which is current Development Plan policy)</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>zones and at the General level (as described above). Some development in the high risk area is classified as non-complying.</p> <p>It appears that within the Flooding General Overlay that habitable buildings, commercial and industrial buildings, and buildings used for animal keeping within this area may be subject to a 300mm build-up to be consistent with Code policy requirements, however depending on their physical location they may not indeed need to be elevated, resulting in potential additional and unwarranted costs to applicants/land owners.</p>	<p>Hazard (Flooding - General) Overlay expanded to cover all land adjacent the high risk Overlay area.</p> <p>The loss of POs 1.2 and 1.3 in the Hazard (Flooding) Overlay relating to land division that were formerly in the 2019 version of the Code is significant and that these policies should be re-introduced to provide important control measures for assessing infrastructure implications of land division proposals.</p> <p>If a DTS fill level value is to be used then it needs to be placed also in the Hazard (Flooding - General) Overlay provisions to give clearer direction for development proposals.</p> <p>DTS criteria in DTS/DPF 3.6 allowing for a post and wire fences is not appropriate</p> <p>A more detailed review of assessment pathways in flood prone areas to result in limited 'Deemed to Satisfy' and 'Accepted' development in flood prone areas.</p> <p>Within higher risk areas development should undergo a performance assessment pathway and ideally DTS criteria ought to be removed so that all development is performance assessed, specific examples of horse keeping and outbuildings were identified as part of the Code review.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Interface Management Overlay	
	<p>Application of the Interface Management Overlay within 500 metres of the existing IWS Northern Baleful at Dublin (Dublin Landfill Facility). The 500 metre application of the Overlay should be taken from the allotment boundaries of the existing facility.</p> <p>The Interface Management Overlay provisions to apply to the assessment of 'dwelling' 'workers accommodation' and 'tourist accommodation' in the Rural Zone.</p>
Recreation Zone / Mallala Racecourse	
<p>Concerns were raised by Council in its response to the 2019 draft of the Code around the transition of the Mallala Racecourse Zone into the Recreation Zone as it did not sufficiently capture the intent of the existing zone within the Mallala Development Plan. Despite some changes to the Recreation Zone it is considered that this zone still does not adequately consider current Development Plan policy.</p> <p>The existing Mallala Motorsport Zone and Light Industry Zone – Mallala Racetrack Policy Area contain a unique suite of policies that are not reflected in any other Development Plan across the State.</p>	<p>Council still does not support the transition of the existing Mallala Racecourse Zone and Light Industry Zone – Mallala Racetrack Policy Area 2 solely into the Recreation Zone within the Code.</p> <p>It is recommend that a new Motorsport Park Subzone (within the Recreation Zone) be created to accommodate the unique suite of policies within the Mallala Development Plan.</p> <p>Council has prepared a draft sub-zone, based on current Development Plan provisions, to provide a starting point for potential additional policy within the Code.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>Neighbourhood Zone</p>	
<p>The Neighbourhood Zone applies within the residential areas of the Two Wells and Mallala townships.</p> <p>The 2019 draft Code proposed to transition the entire Residential Zone to the General Neighbourhood Zone. Council raised concerns with this proposal and the 2020 draft Code proposes most of the existing Residential Zone to now be transitioned to the Neighbourhood Zone (excluding Policy Areas 6)</p> <p>The draft Neighbourhood Zone encourages very low density housing with low rise buildings, often with large outbuildings, easy access and parking for vehicles. Existing Development Plan criteria for minimum allotments sizes, buildings heights and site frontages are managed via TNVs. The Neighbourhood Zone provides suitable on-site waste water management criteria for areas that aren't or cannot be connected to a community waste water management scheme which is an important element for Adelaide Plains Council, particularly as it relates to Two Wells,</p>	<p>This zone is generally suitable for the residential areas within APC, subject to some amendments including frontage widths, setbacks and building heights to reflect current Development Plan policy.</p> <p>Review the zone boundary at the rear of both Daffodil Road and Magnolia Boulevard allotments.</p> <p>PO 10.1 – Part (e) refers to a maximum length of 11.0 metres on the boundary for 'residential ancillary buildings'. There appears to be differences in the Accepted and Deemed to Satisfy/Performance Assessed criteria for various types of residential ancillary buildings (carports/outbuildings/verandahs)</p> <p>Table 1 (Accepted Development)</p> <ul style="list-style-type: none"> ▪ Carport – 11.0 metres ▪ Outbuilding – 11.5 metres ▪ Verandah – 11.5 metres <p>Table 2 (Deemed to Satisfy) + Table 3 (Performance Assessed)</p> <ul style="list-style-type: none"> ▪ Carport - References DTS 10.1 which is 11.0 metres ▪ Outbuilding - References DTS 10.1 which is 11.0 metres ▪ Verandah - References DTS 10.1 which is 11.0 metres <p>It is suggested that these provisions are reviewed to ensure greater consistency, with the intent that Accepted Development is not provided with an increased length relative to the Deemed to Satisfy and Performance Assessed criteria.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>In addition it is questioned whether the community will consider 11.5m wall lengths of 3m or higher on common boundaries to be minor development. This policy approach required further consideration.</p> <p>PO 11.2 - The general intent of this PO is supported, however the same policy applies in both the Design (PO 13.2) and Design in Urban Areas General Development Provisions (PO 19.2). It is recommended that PO 11.2 be removed from each of the above mentioned zones and reference the Design in Urban Areas General Development Provision PO and DTS/DPF 19.1 (the townships of Two Wells and Mallala are considered to be an 'urban' area).</p> <p>Table 2 - Ancillary Accommodation/Detached dwelling/Dwelling addition/Semi-detached dwelling should include reference to PO 1.1</p> <p>Table 2 - Ancillary Accommodation / Carports, Dwellings and Outbuildings reference the Design General Development Provisions. The townships of Two Wells and Mallala are considered to be an 'urban' area and it is considered that these provisions should all to reference Design in Urban Areas General Development Provisions.</p> <p>Table 3 - Ancillary Accommodation should include reference to PO 1.1</p> <p>Table 3 - Ancillary Accommodation / Carports, Dwellings and Outbuildings reference the Design General Development Provisions. The townships of Two Wells and Mallala are considered to be an 'urban' area and it is considered that these provisions should all to reference Design in Urban Areas General Development Provisions.</p> <p>Table 4 – 'Shop' is restricted unless it satisfies one of two exclusions (less than 1000m2 or a restaurant). A shop or group of shops is currently non-complying within the Residential Zone and the change to a 1000m2 shop is considered excessive.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>A reduced floor area should be considered to ensure consistency with both the current the Development Plan criteria and the overall intent of the Neighbourhood Zone.</p> <p>Amend the Minimum Frontage TNV to reflect the current Residential Zone site area criteria.</p> <p>Amend the Minimum Building Heights (Metres) TNV from 9.0 metres to 8.0 metres to reflect the current Residential Zone building height criteria.</p>
<p>Residential Policy Area 6 – Mallala Development Plan</p>	
<p>It is proposed within the revised Code that the existing Residential Policy Area 6 transition to the General Neighbourhood Zone. The intent of the General Neighbourhood Zone is to encourage a range of dwelling types to increase housing diversity and supply. Other non-residential land uses, including small-scale offices and consulting rooms, and a range of community facilities, including education, recreation and community centres are also encouraged. Development is proposed to retain the existing scale of 1 and 2 storey building levels.</p> <p>A review of the changes in policies between the 2019 draft Code and the 2020 draft Code was undertaken to determine if the General Neighbourhood Zone provides a suitable policy framework for the transition from the existing Residential Zone – Policy Area 6.</p>	<p>Council does not support the transition of existing Residential Zone (excluding Policy Area 6) to the General Neighbourhood Zone.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>Overall, the 2020 draft General Neighbourhood Zone is considered to be an improvement from the 2019 consultation version and better reflects the current Development Plan provisions. However, there are still a number of differences that are of a concern if the Residential Policy Area were to transition to this zone. As part of the Commission's release of the 2020 draft Code, the 'Summary of Post Consultation Amendments' (Nov 2020) document states that the General Neighbourhood Zone should be applied where the existing Residential Code applies. The Residential Code currently does not apply to the area contained within the existing Policy Areas 6.</p> <p>The lack of TNV's and ability to bring existing minimum allotments sizes and frontages from the current Development Plan into the Code using the General Neighbourhood Zone, along with the ability to manage sites that are not connected to a CWMS system.</p>	<p>It is recommend that the Residential Policy Area 6 transition to the Neighbourhood Zone, subject to changes to the Neighbourhood Zone including the application of both the Design (PO 13.2) and Design in Urban Areas General Development Provisions (PO 19.2).</p>
<p>Rural Horticulture Zone</p>	
<p>The Rural Horticulture Zone will cover a significant part of the southern area of the Council e.g. current Policy Areas 3 & Precinct 5 of the Primary Production Zone.</p> <p>The Desired Outcomes for the zone (which remain unchanged from the 2019 version of the Code). While the intent of the zone is considered suitable, it is recommended that some detailed policy changes occur.</p>	<p>A TNV value for a minimum dwelling allotment size within each of the existing Horticulture Policy Area 3 (8ha) and Precinct 5 Horticulture (4ha) be spatially applied to the respective areas.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>An additional Performance Outcome to be inserted into the zone to deal with stormwater runoff issues. An example of potential policy is outlined below:</p> <p><i>Stormwater runoff from buildings and hard surfaces captured and managed on-site through storage tanks and/or dams with a combined capacity to prevent direct water runoff onto adjoining public roads or properties.</i></p> <p>Council staff will liaise with the State Government planning staff to develop suitable policy wording during the finalisation of the Phase 3 Code.</p> <p>Table 2 DTS to be updated to reference new PO (and/or DTS) where applicable.</p> <p>The Hazard (Flooding - General) Overlay to be inserted into the classes of development column of zone Tables 1 and 2 wherever the Hazard (Flooding) Overlay applies.</p> <p>Restricted Development Table - the floor area exclusion size for a shop to revert back to the 2019 Code area of 250m².</p> <p>Inclusion of PO and DTS/DPF criteria relating to a front setback requirement for an office in both the Rural and the Rural Horticulture Zones, this existing absence appears to be an oversight.</p> <p>Notification Table - horticulture to be added to the class of development column (it is currently missing).</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	Horse keeping' and 'outbuilding' in Table 2 – both to be subject to the two flood Overlays and to not have the DTS pathway available.
Rural Living Zone	
<p>The Rural Living Zone applies in five areas with the principal location being Two Wells/Lewiston. The areas are the same as outlined in the initial Phase 3 Code 2019 and reflect current Development Plan zoning. The Desired Outcome for the 2020 version of the zone (which remains largely unchanged from the 2019 version of the Code) is:</p> <p><i>A spacious and secluded residential lifestyle within semi-rural or semi-natural environments, providing opportunities for a range of low-intensity rural activities and home-based business activities that complement that lifestyle choice.</i></p> <p>While the objective of the Rural Living Zone is considered suitable, it is recommended that a number of specific planning policy changes are made.</p>	<p>A TNV minimum frontage value of 30m be specified for lots within existing Precinct 3 - Two Wells</p> <p>Restricted Development - the 1,000m² floor area threshold exclusion for a 'shop' is far too large for a Rural Living Zone and the 2019 figure of 200m² should be reinserted.</p> <p>Table 1 - Accepted Development - reference made to the Hazard (Flooding - General) Overlay in addition to and in support of the Hazard (Flooding) Overlay where this is listed as an exception in the classes of development column.</p> <p>Table 2 - DTS - reference must be made to the Hazard (Flooding - General) Overlay in addition to and in support of the Hazard (Flooding) Overlay where this is listed as an exception in the classes of development column, and that both flood Overlays also apply to 'horse keeping' and to 'outbuilding'</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>'Detached dwelling', 'dwelling addition' and 'ancillary accommodation' subject to the Hazard (Flooding - General) Overlay in addition to and in support of the Hazard (Flooding) Overlay where this is listed as an exception in the classes of development column in Table 2 - DTS, with the corresponding DTS 2.1 reference being removed accordingly (i.e. these forms of development become entirely Performance Assessed in relation to flood policy).</p>
<p>Township Activity Centre Zone</p>	
<p>The Township Activity Centre Zone will now only apply to the Mallala Town Centre and not to the Two Wells Centre as was proposed in the 2019 version of the draft Code. This was a change that Council requested when commenting on the 2019 consultation version of the Code.</p> <p>The Township Activity Centre Zone contains appropriate planning policies that would enable a range of acceptable development outcomes to be achieved and has a much more comprehensive suite of policies than the current Mallala Development Plan. This will add greater value to the assessment process and provide clearer guidance to those who wish to develop in the centre subject to some additional planning policy around acceptable building heights.</p>	<p>Amendment to the draft Code to include additional planning policy around acceptable building heights in the Township Activity Centre Zone. TNV/Policy should outline a maximum height of 2 levels and 9m in height.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>Township Main Street Zone</p>	
<p>The Township Main Street Zone will apply to the main street of Two Wells. It is currently zoned in Council’s Development Plan as a Town Centre Zone together with Policy Area 5 Two Wells Town Centre. While the application of the Township Main Street Zone was requested by Council in its response to the 2019 draft Code, it is considered that the draft Zone provisions still do not adequately recognise or retain the significant policy contained in the current Mallala Development Plan.</p> <p>It is recommended that a Town Centre Sub-zone for Two Wells is applied to accommodate current specific Two Wells centre provisions.</p>	<p>Town Centre Sub-zone for Two Wells is applied to accommodate current specific and detailed Two Wells centre provisions. A draft sub-zone has been prepared and is attached as part of Council’s submission to provide a starting point for potential additional policy within the Code.</p> <p>Inclusion of Concept Plan Mal/10 - Two Wells Town Centre Areas (as supplemented by and merged with Concept Plan Mal/1 - Recreation Two Wells.</p> <p>Council are prepared to engage an experienced mapping consultation to prepare a suitable revised Concept Plan to be introduced into the Code.</p> <p>TNV value prescribing a maximum building height spatially applied to all properties within the Zone.</p> <p>Insert the Hazard (Flooding - General) Overlay into the Code zone Tables 1 to 3 (in the classes of development column) wherever the Hazard (Flooding) Overlay is referenced in all cases.</p> <p>Hazards (Flooding - General) Overlay be amended by adding a further PO and DTS/DPF provision for a ‘fence’ similar to that already in the high risk flood Overlay</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>Hazard (Flooding - General) Overlay be specifically inserted into the Code zone Table 3 - Applicable Policies for Performance Assessed Development, in the Overlay column, to ensure that a 'fence' (as amended by the above recommendation), 'residential flat building' (otherwise there will be no levels specified for such development at all, a critical oversight) and 'retaining wall' are subject to this flood Overlay.</p>
<p>Interface between Land Uses (Rural Areas)</p>	
<p>Both the Rural Zone and Rural Horticulture Zone contain a suite of provisions that require the appropriate siting and design of sensitive land uses to ensure that they avoid adverse impacts upon adjoining rural activities.</p> <p>Within the 2020 Phase 3 Code there are interface policies contained within the Interface Between Land Uses General Development policies and the Rural Zone. Both Horticulture and Broad Acre Farming are envisaged land uses within the Rural Zone. While both are key land uses within this zone, they come with a level of complexity when considering how to manage interface issues between them. The 'Guide to the Draft Planning and Design Code – October 2019' states that the 'new rural based zones will contain policies about rural interface management'. It is considered that the inclusion of Horticulture as a 'Deemed to Satisfy' use without appropriate and detailed interface provisions is not consistent with the consultation documentation supporting the intent of the Code.</p> <p>Council do not consider the current provisions within the Rural Zone are detailed enough to address the interface between rural land uses issue, in particular between broad acre farming and horticulture.</p>	<p>Further review of interface provisions within the Rural Zone should be undertaken to strengthen the level of detailed planning policy that deals with rural interface issues, particularly between farming and horticulture activities. (Council staff are happy to be involved in the review process)</p> <p>Rural Zone - DTS/DPF 3.1 criteria for 'Horticulture' is reinstated (or a similar criteria be inserted) to manage the interface between horticulture and farming activities.</p> <p>Recommended that the Rural Zone - DTS/DPF 12.1(d) be reinstated as 250m² to reflect the 2019 draft Code criteria and provide a size more suitable for a Deemed to Satisfy assessment pathway.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
	<p>Recommend that Table 5 – Procedural Matters (Notification) in both the Rural Zone + Rural Horticulture Zone be amended to incorporate the following:</p> <ul style="list-style-type: none"> • Reinstate ‘function centres’ as a requirement to undergo public notification. Should this exemption not be removed, that it is recommended that DTS/DPF 6.5 also be included as part of its notification requirement (this would limit the size to a maximum 75 persons) <p>Recommend that Table 5 – Procedural Matters (Notification) in the Rural Zone be amended to incorporate the following:</p> <ul style="list-style-type: none"> • ‘Horticulture’ exceptions should state – ‘Horticulture that is unable to satisfy Rural Zone DTS/DPF 3.1 (d), (e) and (f)’ • Reinstate a size limit for ‘tourist accommodation’ to ensure that larger forms of tourist accommodation require public notification.
<p>Coastal Areas</p>	
<p>The existing Coastal Conservation Zone and Rural Settlement Zone are proposed transition to the Conservation Zone and Rural Settlement Zone within the revised Phase 3 2020 Code. The Coastal Areas Overlay will contain coastal related development assessment provisions and a referral trigger to the Coastal Branch for any coastal development. In the 2019 draft Code it was also intended that a Dwelling Subzone be employed so that a similar suite of policies to those contained within the current Coastal Conservation Zone of the Mallala Development Plan could be included in the Code.</p>	<p>Reinstate the Dwelling Subzone to the Adelaide Plains Council area or include policy that requires new dwellings to undergo a performance assessed assessment with appropriate planning policy to guide environmental protection.</p>

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
<p>It is understood that the Department for Environment and Water provided a submission on the 2019 draft Code and requested that the Dwelling Subzone should not apply to coastal land within the Adelaide Plains Council, as the area is ecologically sensitive (with parts located in the Adelaide International Bird Sanctuary National Park) and subject to coastal flooding.</p> <p>The Commission has removed the Dwelling Subzone from the Adelaide Plains Council area. The result of this change it that the construction of new dwellings will now be 'Restricted' development, not performance assessed development as was previously the case in the 2019. The replacement of an existing lawfully erected dwelling will however be an exclusion to the restricted pathway and ensure that a replacement dwelling will be performance assessed.</p> <p>The inclusion of new dwellings as a 'Restricted' development is a change from the current Development Plan provisions under which dwellings are classed as a merit form of development. Noting that the zone policies tend to only encourage replacement dwellings or dwelling additions, since the Coastal Conservation Zone's Objectives and PDCs do not actively encourage the construction of new dwellings in any event.</p> <p>Despite this the allocation of dwellings as Restricted seems a somewhat heavy handed policy response when a merit assessment with appropriate planning policy to guide environmental protection may be a more reasonable outcome for existing land owners within Adelaide Plains.</p>	

Adelaide Plains Council Issues / Comments	Adelaide Plains Council Recommendations
Industry/Light Industry	
	Reinstate a 20m setback from Port Wakefield Road that covers the existing Industry and Light Industry Zones as a Code setback (could potentially be achieved via a TNV minimum primary street setback value spatially applied to the affected properties).

Attachment A – Revised Animal Husbandry Sub-Zone

Attachment B – Mallala Motorsport Park Sub-Zone

Attachment C – Two Wells Town Centre Sub-Zone