

Submission on draft Greater Adelaide Regional Plan – for approval

Strategic Alignment – Our Places

Public

Tuesday, 5 November 2024
City Planning, Development and Business Affairs Committee

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Approving Officer:
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EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of a submission to the State Government's engagement on the draft Greater Adelaide Regional Plan (the draft GARP). The draft GARP is available in pdf format ([Link 1](#)) and digital online format ([Link 2](#)).

The State Planning Commission released the draft GARP on 23 September 2024 and is undertaking community engagement until 4 November 2024. The City of Adelaide submitted its draft submission on the draft GARP by the close of consultation on 4 November 2024. Pending the Council's decision, the endorsed submission will be submitted to the State Planning Commission by an agreed timeframe of 15 November 2024.

The State Planning Commission is seeking feedback on:

- The location of new housing and employment
- Major infrastructure required to support growth
- Specific areas that should be protected from future development.

Council Members were notified and invited to attend an online local government briefing held by the State Government on the draft GARP on 24 September 2024.

The City of Adelaide's submission (Attachment A) responds to the key considerations for local government identified by the State Planning Commission in making submissions, summarised as follows:

- Alignment with the City of Adelaide's strategic land use and local area planning and infrastructure strategies.
- Progress made by the City of Adelaide between the release of the GARP Discussion Paper and the draft GARP.
- Additional work by local governments relating to planning and specifically delivering on proposed targets and actions.

The City of Adelaide's submission outlines the role of the Capital City in Greater Adelaide, includes the Greater Adelaide Open Space System, that replaces the former Metropolitan Open Space System (MOSS), and makes 15 key recommendations for finalising the GARP. Specific commentary is provided on the targets and actions contained in the draft GARP.

The submission aligns with the strategic land use planning and spatial analysis in the *City Plan – Adelaide 2036* as well as relevant matters raised by the City of Adelaide in submissions on the Greater Adelaide Regional Plan Discussion Paper endorsed 14 November 2023 ([Link 3](#)) and the Expert Panel on the Planning System Implementation Review (January 2023).

The City of Adelaide seeks further collaboration with the State Planning Commission to include relevant data and outcomes from the *City Plan – Adelaide 2036*, and other strategies, in finalising the GARP.

The GARP relies on the State Infrastructure Strategy and State Transport Strategy to ensure coordinated planning and delivery of the outcomes. These key supporting strategies will not be finalised until 2025.

The City of Adelaide's submission seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the submission on the draft Greater Adelaide Regional Plan as contained in Attachment A to Item 7.2 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.
 2. Authorises the Chief Executive Officer, or delegate, to make minor editorial or formatting amendments to finalise the submission on the draft Greater Adelaide Regional Plan as contained in Attachment A of Item 7.2 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.
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IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	<p>Strategic Alignment – Our Places</p> <p>Encourage bold, interesting and purposeful development that supports the changing needs of our community and city.</p>
Policy	<p>The recommendations proposed in this report align with the City of Adelaide's Strategic Plan 2024-2028, <i>City Plan – Adelaide 2036</i>, <i>Adelaide Park Lands Management Strategy</i>, <i>Integrated Climate Strategy</i>, <i>Economic Development Strategy</i> and <i>Housing Strategy</i>.</p>
Consultation	<p>This report responds to the State Planning Commission's consultation process regarding the development of a new Greater Adelaide Regional Plan (GARP).</p> <p>The City of Adelaide's draft submission is informed by endorsed Council strategies with input from across the organisation.</p> <p>Council Members were notified on 20 September 2024 of an invitation to attend an online local government briefing run by the State Government on 24 September 2024.</p> <p>Kadaltilla / Adelaide Park Lands Authority approved a submission on the draft GARP at its meeting held on 24 October 2024.</p>
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	<p>Council endorsed the <i>City Plan – Adelaide 2036</i> as the strategic land use planning and urban design framework for the city and North Adelaide. The <i>City Plan – Adelaide 2036</i> was informed by extensive consultation, including with the State Government, and is a key City of Adelaide evidence base and input to the GARP.</p> <p>The submission contained in Attachment A is also informed by the City of Adelaide's submissions on the Greater Adelaide Regional Plan Discussion Paper (November 2023) and the Expert Panel on the Planning System Implementation Review (January 2023).</p>
24/25 Budget Allocation	Not as a result of this report
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	<p>The GARP is a 30-year plan to strategically guide planning and land use planning across the Greater Adelaide Region.</p>
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (e.g. maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The purpose of this report is to seek endorsement of a submission to the State Government's engagement on the draft Greater Adelaide Regional Plan (the draft GARP). The draft GARP is available in pdf format ([Link 1](#)) and digital online format ([Link 2](#)).
2. On 14 November 2023, the Council endorsed a response ([Link 3](#)) to the GARP Discussion Paper (Discussion Paper) which made 37 recommendations across the following seven focus areas:
 - 2.1. A climate resilient city
 - 2.2. Prioritise city growth
 - 2.3. Recognise Adelaide Park Lands and Karrawirra Pari
 - 2.4. A city of neighbourhoods
 - 2.5. Better infill outcomes
 - 2.6. Better connections to and around the CBD
 - 2.7. Respect traditions, heritage and culture.
3. The draft GARP responds at a high level to the majority of recommendations made by the City of Adelaide. Where matters are outstanding, these are reiterated in the submission to the draft GARP, including:
 - 3.1. Recognition and demonstration of alignment with *City Plan – Adelaide 2036*, *Housing Strategy – Investing in our Housing Future*, and *Economic Development Strategy*.
 - 3.2. Recognition of the important role of the Adelaide Park Lands and strengthening the alignment with the Adelaide Park Lands Management Strategy, including the need for funding contributions and capital investment.
 - 3.3. Acknowledgement of the need to review catalyst site policy as recommended by the Expert Panel on the State Government's Review of the Implementation of the Planning System.
 - 3.4. Strengthening and broadening references to adaptive reuse.
4. The draft GARP's key focus is to guide the growth and sustainable development of the Greater Adelaide Planning Region over the next 15-30 years. It aims to ensure a consistent supply of affordable land and diverse housing options while offering clear direction to the community, councils, and developers on Greater Adelaide's long-term growth.
5. The GARP focuses on preserving green spaces and tree canopies, modernising essential services and infrastructure, recognising neighbourhood character, and prioritising environmental sustainability.
6. The draft GARP identifies five (5) themes, six (6) outcomes and four (4) targets.
 - 6.1. The *City Plan—Adelaide 2036*—was developed in alignment with these themes and outcomes. [Link 4](#) provides an assessment of the themes, outcomes, and targets.
7. The draft GARP identifies 37 actions over the next 5 years, with actions to be updated on a rolling basis. Key actions relevant to the City of Adelaide are addressed in **Attachment A**.
8. There is only one action (Action 6) that is specific to the City of Adelaide. This action proposes a State Government Code Amendment to increase building heights in the CBD, in conjunction with the Commonwealth Government and Adelaide Airport Ltd, within 2 years of finalising the GARP (ie by 2027).
9. The City of Adelaide has developed a multi-year Code Amendment Program to improve development policy in the Planning and Design Code. The Code Amendment program is designed to efficiently progress key issues-based amendments and enable meaningful public engagement on each issue.
10. The City of Adelaide's submission requests that the building heights Code Amendment be undertaken in collaboration with Council through its Code Amendment Program, and that *City Plan – Adelaide 2036* is used to guide where and to what extent building heights are reviewed.

Consultation on the draft GARP

11. The State Planning Commission released the draft GARP on 23 September 2024 and is undertaking community engagement and seeking feedback by 4 November 2024 to inform the GARP's finalisation.
12. The State Planning Commission is seeking feedback on:
 - 12.1. The location of new housing and employment

- 12.2. Major infrastructure required to support growth
- 12.3. Specific areas that should be protected from future development.
- 13. The State Planning Commission has indicated that the key considerations for local government in making submissions are:
 - 13.1. Alignment with local government strategic land use and local area planning, and infrastructure strategies.
 - 13.2. Progress made by local government between the release of the GARP Discussion Paper and the draft GARP.
 - 13.3. Additional work by local governments relating to planning and specifically delivering on proposed targets and actions.
 - 13.4. Feedback on growth assumptions used to inform the preparation of the draft GARP and principles (such as living locally) is not required as this was widely consulted on through the Discussion Paper.

The City of Adelaide's Submission

- 14. The City of Adelaide's submission (Attachment A) is structured to respond to the key considerations for local government identified by the State Planning Commission in making submissions.
- 15. It also outlines the role of the Capital City in Greater Adelaide, includes the Greater Adelaide Open Space System, that replaces the former Metropolitan Open Space System (MOSS), and makes 15 key recommendations, as follows:
 - 15.1. Incorporate the strategic planning undertaken by the City of Adelaide through *City Plan – Adelaide 2036* and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.
 - 15.2. The City of Adelaide seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.
 - 15.3. Greater recognition of the role of the Capital City in supporting the Greater Adelaide Region's liveability.
 - 15.4. The City of Adelaide (excluding the Adelaide Park Lands) is identified as a State Significant infill area (mapping on page 40 of the pdf version).
 - 15.5. Well-timed infrastructure upgrades to meet future housing demand in the City of Adelaide, including investment by SA Water infrastructure and other essential utilities.
 - 15.6. Infrastructure schemes should apply to State Significant infill areas in addition to growth areas.
 - 15.7. Consideration is given to an urban renewal area in the CBD where there is a concentration of government land holdings and high ownership by the South Australian Housing Trust.
 - 15.8. Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.
 - 15.9. Missing Middle housing includes additional housing typologies that apply to the City of Adelaide to encourage diversity and housing choice (pages 77 to 80 of the pdf version).
 - 15.10. Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.
 - 15.11. Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).
 - 15.12. The Commission incorporates relevant *City Plan* data and outcomes into the Stage 1 GARP in March 2025 as a resource for State and local governments aligned with Action 4 – Local Government Strategic Planning; and that data-sharing agreements are resolved between levels of government.
 - 15.13. Strengthen and broaden recognition of the role of the National Heritage listed Adelaide Park Lands within the open-space system for its contribution to biodiversity, canopy cover, recreation, tourism and Aboriginal and cultural heritage.
 - 15.14. Strengthen the application and consideration of heritage policies at all levels of assessment including reference to opportunities for State Heritage listing of the Adelaide Park Lands to support Council's goal in achieving World Heritage listing, and recognition and management of the impact of infill on built heritage.
 - 15.15. Master planned and infill sites near the Adelaide Park Lands provide on-site local open-space and mechanisms for investment in the Adelaide Park Lands.

16. The submission seeks further collaboration between the City of Adelaide and the State Planning Commission to include relevant data and outcomes from the *City Plan – Adelaide 2036* and other strategies, in finalising the GARP.
17. The GARP relies on the State Infrastructure Strategy and State Transport Strategy to ensure coordinated planning and delivery of the outcomes. These key supporting strategies will not be finalised until 2025.
18. Many of the outcomes are reliant on additional investigations and/or based on investigations that are not referenced or provided as part of the consultation process and have therefore not been reviewed (e.g., Open Space Strategy).
19. The GARP has limited strategically significant 'big moves', noting that further work/investigations, including input from local government, are still to be delivered in the next stage.
20. The City of Adelaide's submission seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.

Next Steps

21. The City of Adelaide's draft submission on the draft GARP was submitted by the end of consultation period on 4 November 2024.
22. Pending the Council's decision, the City of Adelaide's endorsed submission on the draft GARP will be finalised and submitted to the State Planning Commission by the agreed timeframe of 15 November 2024.
23. Administration will provide additional technical advice to the State Government Agency, Planning and Land Use Services, to strengthen or add technical detail to the strategies across a range of themes and outcomes consistent with endorsed Council strategies.
24. The State Government is expected to release the final GARP in the first quarter of 2025.

DATA AND SUPPORTING INFORMATION

Link 1 – [Draft Greater Adelaide Regional Plan \(pdf format\)](#)

Link 2 – Draft Greater Adelaide Regional Plan ([digital online format](#))

Link 3 – [Council's Greater Adelaide Regional Plan Discussion Paper Submission](#)

Link 4 – [Analysis of Themes, Outcomes and Targets in the draft GARP](#)

ATTACHMENTS

Attachment A – Draft submission on the Draft Greater Adelaide Regional Plan

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