

Enquiries: Sarah Gilmour
Reference:

November 2024

Planning and Land Use Services
Attention: Growth Management Team
Department for Housing and Urban Development
GPO Box 1815
ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

Attention: State Planning Commission

Thank you for the opportunity to contribute to the development of the Greater Adelaide Regional Plan (GARP).

The City of Adelaide actively engaged with the State Planning Commission (the Commission) and Planning and Land Use Services (PLUS) during the GARP's development and welcomes the opportunity to further contribute to its finalisation.

The Council decided its submission on the draft GARP at its meeting held on 12 November 2024 (Enclosure 1).

The City of Adelaide's submission is structured to respond broadly 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.

It also outlines the role of the Capital City in Greater Adelaide, comments on the Greater Adelaide Open Space System, and makes 15 key recommendations for finalising the GARP.

The City of Adelaide's submission aligns with the strategic land use planning and spatial analysis in the *City Plan – Adelaide 2036*.

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 City of Adelaide seeks a further round of consultation on the GARP when key State Government strategic documents are available and are proposed to be incorporated into the GARP.

Additional technical advice prepared by Administration to strengthen or add technical detail to the strategies across a range of themes and outcomes is provided in Enclosure 2.

Specific commentary is provided on the targets and actions contained in the draft GARP.

The City of Adelaide's contact for further information about the submission is Sarah Gilmour, Associate Director Park Lands, Policy and Sustainability.

Kind regards

Michael Sedgman

Chief Executive Officer

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1 City of Adelaide submission to the draft Greater Adelaide Regional Plan

2 City of Adelaide administrative and technical detail for the draft Greater Adelaide Regional Plan

Enclosure 1. City of Adelaide submission to the draft Greater Adelaide Regional Plan

Alignment with the City of Adelaide's strategic land use and local area planning, and infrastructure strategies

During the draft GARP's development, the City of Adelaide completed comprehensive strategic land use and spatial planning.

The City of Adelaide acknowledges strong alignment between the themes and targets in the draft GARP and the City of Adelaide's strategies.

The City of Adelaide and the State Government are also key stakeholders in the Adelaide Park Lands Management Strategy. Following an extensive period of joint review by the City of Adelaide and the State Government, the Kadaltilla/Adelaide Park Lands Authority endorsed a comprehensive review of the strategy on 24 October 2024.

Work has commenced on the City of Adelaide's Integrated Transport Strategy and Social Infrastructure (Assets) Policy which are to be completed in 2025.

In accordance with Action 4 of the draft GARP the City of Adelaide submits the following to be addressed in the GARP:

- *City of Adelaide Strategic Plan – 2024-2028*
- *City Plan – Adelaide 2036*
- *Housing Strategy – Investing in our housing future*
- *Economic Development Strategy – A thriving economy for all*
- *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*
- *Homelessness Strategy – Everyone's Business*
- *Adelaide Park Lands Management Strategy – Towards 2036.*

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.

Progress made by the City of Adelaide between the release of the GARP Discussion Paper and the draft GARP

The City of Adelaide acknowledges that many of the recommendations made by the City of Adelaide on the Greater Adelaide Regional Plan Discussion Paper (the Discussion Paper) have been addressed in the draft GARP. Where outstanding recommendations remain relevant to the City of Adelaide these are reiterated in this submission for further consideration, with additional context showing alignment with the strategic planning work undertaken by the City of Adelaide in the intervening time.

The City of Adelaide supports the following elements of the draft GARP:

- Place-based and digital planning frameworks
- Housing as a fundamental right
- Aboriginal culture and collaboration
- Moving beyond sustainability to a regenerative future
- Living locally
- Expansion and review of affordable housing tools
- Recognition of the potential for adaptive reuse
- Recognition of the UNESCO World Heritage Listing bid
- Opportunities for collaboration between the City of Adelaide and the State Government to facilitate affordable housing in the city.

The Commission's submission on the City Plan in July 2024 identified strong alignments with the draft GARP, noting both the State Government and the City of Adelaide are focussed on population and housing growth, economic development and sustainable outcomes.

The City of Adelaide's submission to the GARP is directed towards these key alignments, particularly in regard to the actions, outcomes and targets.

The City of Adelaide acknowledges the significant investigations undertaken in the preparation of the draft GARP as outlined in the Technical Paper. This includes background research documents, including the Open Space Strategy, the State Infrastructure Strategy and State Transport Plan (proposed for 2025). These are key inputs into the draft GARP around future infrastructure and transport requirements and vital for consideration of the overall growth, liveability and climate impact of the region.

The City of Adelaide acknowledges that the draft GARP highlights the vital role local government plays in shaping the Greater Adelaide Region and emphasises a collaborative approach between State and local governments to achieve liveable, accessible, and inclusive communities.

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.

The Role of the Capital City

The city centre will be increasingly important in providing housing, infrastructure, and services such as transport, social infrastructure, and open space to support the forecast growth of 670,000 people and 315,000 additional homes across Greater Adelaide.

The City of Adelaide supports the GARP's use of high-growth population projections and notes this growth is below the aspirational target of 50,000 people by 2036 set by the City of Adelaide.

The GARP seeks to balance population, housing, and job growth across the Greater Adelaide Region. The draft GARP reads as a metropolitan strategy with a focus on suburbs and future land supply in outer Greater Adelaide. The Capital City should be better recognised in vision statements and *Outcome 1: More housing in the right places*.

The draft GARP section on 'State-significant infill areas' makes multiple references to the Adelaide City Centre as a significant infill area; however, this is not shown in the corresponding mapping. Government land holdings and specifically ownership by the South Australian Housing Trust in the CBD, provide an opportunity to identify an urban renewal area.

The City of Adelaide seeks greater emphasis and detail regarding the role of the city centre in supporting Greater Adelaide's liveability based on the City Plan – Adelaide 2036.

The City Plan includes city-wide strategies that aim to unlock the growth potential of the city which is pivotal in supporting the Greater Adelaide Region through economic development and as the location for the largest educational institutions, healthcare providers, tourist accommodation, retail and innovation precincts.

The City Plan's definition of the 'Missing Middle' of housing is broader than the draft GARP and recognises additional typologies that are particularly suitable in the city context.

Similarly, the GARP's support for the adaptive reuse of existing buildings and heritage places should extend to policy that requires future developments to be designed for future alternative uses with mandatory adaptable floorplates.

The City of Adelaide seeks:

- Greater recognition of the role of the Capital City in supporting the Greater Adelaide Region's liveability.
- 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).
- Well-timed infrastructure upgrades to meet future housing demand in the City of Adelaide, including investment by SA Water infrastructure and other essential utilities.
- Infrastructure schemes should apply to State Significant infill areas in addition to growth areas.
- 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.
- 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.
- 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).
- 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.
- Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).
- The Commission to incorporate 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.

Greater Adelaide Open Space System

The shared State Government and City of Adelaide, Adelaide Park Lands Management Strategy – Towards 2036, identifies urban renewal areas and State-Significant Infill Areas within 400 metres of the Adelaide Park Lands as partnership opportunities to ensure that the Adelaide Park Lands can respond to growth both within the City of Adelaide and surrounding Local Government areas.

These partnerships will require joint investment from both State and Local Government to ensure that the Adelaide Park Lands continue to be recognised not only for their aesthetic value but also for the social, cultural, heritage, environmental and economic benefits they provide for all South Australians.

The City of Adelaide seeks to:

- 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.
- 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.
- Ensure master-planned and infill sites near the Adelaide Park Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.

Summary of Key Recommendations

The City of Adelaide submits the following key recommendations in finalising the GARP.

- 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.
- 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.
- Greater recognition of the role of the Capital City in supporting the Greater Adelaide Region's liveability.
- 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).
- Well-timed infrastructure upgrades to meet future housing demand in the City of Adelaide, including investment by SA Water infrastructure and other essential utilities.
- Infrastructure schemes should apply to State Significant infill areas in addition to growth areas.
- 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.
- 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.
- 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).
- 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.
- Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).
- The Commission incorporate 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.
- 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.
- 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.
- Master planned and infill sites near the Adelaide Park Lands provide on-site local open-space provision and mechanisms for investment in the Adelaide Park Lands.

Enclosure 2 City of Adelaide administrative and technical detail for the draft Greater Adelaide Regional Plan

The following administrative feedback is provided on the draft GARP. City of Adelaide is referred to as CoA. **Red text** denotes suggested editorial changes. **Key recommendations in bold** align with the Council endorsed submission.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Vision and Context			
Introduction	Heritage and character buildings and places are valued by the community and contribute to Greater Adelaide placemaking and identity. Reference to this key part of Greater Adelaide should be included in the Introduction	<i>Heritage Strategy</i> <i>City Plan – Adelaide 2036</i>	Change requested Recommend referencing the role that heritage and character buildings and places play in Greater Adelaide placemaking and identity.
Pathways towards a regenerative future	Support moving beyond sustainability to regenerative futures noting adaptive reuse and retrofitting existing building stock should form an essential part of a regenerative future framework. The Adelaide Park Lands Management Strategy— Towards 2036 includes regenerative planning principles to help inform future master planning and management of the Adelaide Park Lands.	<i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i> <i>Adelaide Park Lands Management Strategy – towards 2036</i> <i>Adaptive Reuse City Housing Initiative</i>	Support and encourage further investigations City of Adelaide would welcome future engagement in developing a regenerative planning framework and toolkit, and development of a promotional strategy that encourages implementation of adaptive reuse in other local government areas.
The urban form to deliver the vision	To retain character and to support circular economy and regenerative planning principles, adaptive reuse is another urban form to identify as an opportunity in urban renewal areas. Recognise the primacy of the city centre and that the future urban form relies not only on retrofitting existing low-density neighbourhoods and new communities but unlocking significant growth potential in the CBD.	<i>City Plan – Adelaide 2036</i> <i>Adaptive Reuse City Housing Initiative</i>	Change requested Recommend promoting adaptive reuse in areas of renewal, to retain character and support circular economy and regenerative planning principles. Key recommendation - 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.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
People Housing and Liveability			
Outcome 1 – More Housing in the right places	Adaptive reuse can provide an additional mode of housing supply across the existing housing spectrum. Conversion of vacant or underutilised building stock has been identified as one way to deliver more housing in the city where residents can access services, work, education, entertainment and green space.	<i>City Plan – Adelaide 2036</i> <i>Adaptive Reuse City Housing Initiative</i>	Change requested Recommend policy refinements to support and incentivise adaptive reuse as a mode of housing supply. Key recommendation - 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.
Future housing land supply	The City of Adelaide supports housing diversity and choice.	<i>City Plan - Adelaide 2036</i> <i>Housing Strategy – Investing in our housing future</i> <i>Adaptive Reuse City Housing Initiative</i> <i>Code Amendment Program</i>	Change requested Specifically reference CBD development in addition to infill, greenfield and township development (page 32 of the pdf version).
State Significant Infill Areas	This should be reinforced by mapping the whole of the City of Adelaide (excluding the Adelaide Park Lands) in the State Significant Infill Areas mapping layer.	<i>City Plan - Adelaide 2036</i> <i>Housing Strategy – Investing in our housing future</i>	Change requested Key recommendation - 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).
State Significant Infill Areas	The Expert Panel Implementation Program released by the Department of Housing and Urban Development in September 2024 identified that the GARP would provide direction for the City of Adelaide on catalyst sites. The City of Adelaide seeks to progress this policy review as a matter of priority and can assist in the Code Amendment.	<i>Housing Strategy – Investing in our housing future.</i> <i>Code Amendment Program</i>	Change requested New Action Review and refine catalyst site policies in accordance with the recommendations of the Expert Panel (within 2 years). Key recommendation - Create an additional Action to undertake a Catalyst Site Policy Review Code

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			Amendment (in accordance with the recommendations of the Expert Panel).
<p>State Significant Infill Areas - Adelaide City section</p>	<p>Support collaborative opportunities that facilitate more affordable housing in the city as this aligns with several City of Adelaide Plans and Strategies.</p> <p>Reference to catalyst site policies in this section does not reflect that the Expert Panel, State Government and the City of Adelaide agree that catalyst site policies need to be reviewed. The City of Adelaide requests this sentence be reworded.</p> <p>An amendment to wording in the lead paragraph is recommended to reflect that essential workers and students can also be permanent residents. In addition, the City of Adelaide has a strategic objective to increase the number of families living in the city which should also be reflected here.</p>	<p><i>City Plan - Adelaide 2036</i></p> <p><i>City of Adelaide Strategic Plan – 2024-2028</i></p> <p><i>Housing Strategy – Investing in our housing future</i></p> <p><i>Economic Development Strategy – A thriving economy for all</i></p>	<p>Changes requested</p> <p>Remove reference to catalyst sites facilitating well planned growth. Include an additional sentence that captures the intent to review and refine policies in the City of Adelaide that addresses concerns about the lack of interface management and local context considerations in the current policy whilst enabling opportunity for innovative, and site-responsive design of larger sites</p> <p>Recommend changing to "Adelaide City is the heart of our state’s civic, cultural and commercial life and is a key contributor to infill growth. It will play a more important role in delivering convenient and affordable housing opportunities for all, including essential workers, families and students."</p>
<p>State Significant Infill Areas - Adelaide City section</p>	<p>There is opportunity to unlock dwelling potential through adaptive reuse, however there is a need for longer term investment in adaptive reuse at national, state and local government levels.</p>	<p><i>City Plan - Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our housing future.</i></p> <p><i>Adaptive Reuse City Housing Initiative</i></p>	<p>Support</p> <p>Recommend further investigation into adaptive reuse investment.</p> <p>Key recommendation - 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.</p>
<p>State Significant Infill Areas - Adelaide City section</p>	<p>A number of the identified State-Significant Infill Areas are within proximity (400m) to the Adelaide Park Lands and will receive great benefit from this landscape by way of</p>	<p><i>Adelaide Park Lands Management Strategy – towards 2036 (draft)</i></p> <p><i>City Plan - Adelaide 2036</i></p>	<p>Support</p> <p>Opportunity for partnerships</p> <p>Key recommendation - Master planned and infill sites near the Adelaide Park</p>

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	<p>provision of open space, cooling and opportunities to engage with nature.</p> <p>The <i>Adelaide Park Lands Management Strategy – Towards 2036</i> identifies these urban renewal areas as partnership opportunities to ensure that the Adelaide Park Lands can respond to growth both within the City of Adelaide and surrounding Local Government areas.</p> <p>These partnerships will require joint investment from both State and Local Government to ensure that the Adelaide Park Lands continue to be recognised not only for their aesthetic value but also for the social, cultural, heritage, environmental and economic benefits they provide for all South Australians.</p> <p>Consideration also needs to be given to the impacts additional growth will have on infrastructure and service provision within the City of Adelaide.</p>		<p>Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.</p>
<p>Local Infill Investigations Areas</p>	<p>The long-term strategic objectives and the section on local coordination and delivery aligns with City Plan and Housing Strategy investigations and outcomes. Consider including adaptive reuse as another housing option to be investigated in local area planning (including shop-top housing).</p> <p>The City of Adelaide is not identified for local infill. The mapping could include the development potential sites identified in <i>City Plan – Adelaide 2036</i></p>	<p><i>City Plan – Adelaide 2036</i> <i>Housing Strategy – Investing in our housing future</i> <i>Adaptive Reuse City Housing Initiative</i></p>	<p>Support with change</p> <p>Include development potential sites in the mapping layer from <i>City Plan – Adelaide 2036</i>.</p> <p>Promote shop-top housing/conversion of underutilised spaces for residential uses.</p> <p>Key recommendation - 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.</p>
<p>Strategic Infill co-ordination and incentives</p>	<p>There is alignment with City of Adelaide City Plan and Housing Strategy, particularly in seeking partnerships with State Government to facilitate master planning, and co-ordination of larger sites.</p>	<p><i>City Plan - Adelaide 2036</i> <i>Housing Strategy – Investing in our housing future</i></p>	<p>Support with change</p> <p>Include adaptive reuse as a housing option.</p>

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	<p>Whilst the scale of sites in the City of Adelaide may be smaller than in other areas of the region, the same principles apply.</p> <p>Adaptive reuse is another housing option that could be included here.</p>	<p><i>Adaptive Reuse City Housing Initiative</i></p>	<p>Key recommendation - 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.</p>
<p>Housing Diversity and Affordability</p>	<p>Long-term strategic objectives are supported.</p> <p>The City of Adelaide seeks to collaborate on policy to facilitate missing middle housing. Some refinements to the objectives are recommended to provide greater opportunities.</p>	<p><i>City Plan - Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our housing future</i></p>	<p>Support with change</p> <p>Objective 2 - Include universal design</p> <p>Objective 3 – include partnerships as another mechanism to facilitate affordable and social housing</p> <p>Key recommendation - 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).</p>
<p>Housing Diversity and Affordability</p>	<p>There is an emphasis on increasing the housing supply but greater emphasis should be placed on providing quality living environments, including acknowledgement that quality and sustainable building practices helps facilitate long-term housing affordability.</p> <p>Guidance is needed to ensure that new buildings are designed and built so that they can be adaptable to changes in market demands. For example, serviced apartments, student accommodation and hotel accommodation.</p>	<p><i>City Plan - Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our housing future</i></p> <p><i>Code Amendment Program</i></p>	<p>Support with change</p> <p>Consider as part of future updates to the Planning and Design Code</p> <p>Key recommendation - 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.</p>
<p>Housing Diversity and Affordability</p>	<p>The City of Adelaide recommends further investigations and expansion of design considerations for apartments is needed as part of providing certainty and incentives for more diverse housing, including for adaptive reuse (this is</p>	<p><i>City Plan - Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our housing future</i></p> <p><i>Code Amendment Program</i></p>	<p>Changes recommended</p> <p>Further investigations into design of apartments.</p> <p>Key recommendation - Stronger adaptive reuse policy that provides for</p>

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	in addition to the Accommodation Diversity Code Amendment).		the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.
Housing Diversity and Affordability	The City of Adelaide strongly supports the commitment to delivery of more social and affordable houses and affordable rental opportunities, review of affordable housing policies, extension of the Affordable Housing Overlay and affordable housing offset scheme. This will support increased supply of affordable housing to rent or buy that is designed for affordable living and located across the Greater Adelaide Region to be accessible for people in all communities/localities.	<i>City Plan - Adelaide 2036 Housing Strategy – Investing in our housing future.</i>	<p>Support</p> <p>Key recommendation – 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.</p> <p>Key recommendation - 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.</p>
Outcome 2 – Liveable, accessible and inclusive communities	The City of Adelaide supports the Living Locally approach	<i>City Plan – Adelaide 2036</i>	<p>Support</p> <p>Additional emphasis on the CBD could be provided.</p>
Regional Open Space	<p>Support the long-term strategic objectives for regional open space through the introduction of Open Space Principles and the Greater Adelaide Open Space System.</p> <p>Long-term strategic objective 2 could be further developed to acknowledge that the Adelaide Park Lands are National Heritage Listed and include the significant biodiversity contribution to the city and surrounding areas.</p>	<i>Adelaide Park Lands Management Strategy – Towards 2036</i>	<p>Change recommended</p> <p>Update Objective 2 to acknowledge that the Adelaide Park Lands are National Heritage Listed and are essential for biodiversity conservation, community well-being and ecological health.</p> <p>Consider introducing a 'no-net loss of open space' as a strategy or objective.</p> <p>Key recommendation - 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,</p>

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			<p>canopy cover, recreation, tourism and Aboriginal and cultural heritage.</p> <p>Key recommendation - Master planned and infill sites near the Adelaide Park Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.</p>
Regional Open Space	<p>The concept of Greenways is supported, however the definition of Greenways does not align with current South Australian legislation '<i>Recreational Greenways Act 2000</i>' which defines what a 'greenway' is in South Australia and that these must be proclaimed under the Act.</p>	<p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p>	<p>Change recommended</p> <p>Amend the definition of Greenways to align with the <i>Recreational Greenways Act, 2000</i> or the term 'Greenway' should be re-thought to refer to Green Corridors, Wildlife Corridors, Biodiversity Corridors, Recreation Corridors or similar.</p>
Regional Open Space	<p>The reimagining of the existing Metropolitan Open Space System (MOSS) is conditionally supported. The draft Greater Adelaide Open Space Strategy (GAOSS) has not been provided so it is difficult to understand how the Adelaide Park Lands fits within this system and if there are any future expectations on the role in which the Adelaide Park Lands will play for metropolitan Adelaide. It is also unclear if there are any governance or funding linkages between the Adelaide Park Lands and the proposed Northern Park Lands.</p>	<p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p>	<p>Further information is needed to be able to comment constructively on this approach.</p>
Regional Open Space	<p>The Open Space network – Green Space layer identifies Possum Park / Pirltawardli (Park 1) in the Adelaide Park Lands.</p>	<p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p>	<p>Further information is needed to be able to comment constructively on this approach.</p> <p>Mapping of the Adelaide Park Lands in the GARP to be subject to future discussions with the City of Adelaide and Kadaltilla/Adelaide Park Lands Authority.</p>
Regional Open Space	<p>Further clarification or guidance is needed in regard to the following:</p>	<p><i>City Plan – Adelaide 2036</i></p>	<p>Clarification and changes recommended</p>

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	<ul style="list-style-type: none"> A definition of 'open space' to clarify that it may also include 'hard spaces' such as plazas and it is not only 'green space'. Guidance on the development of local open space planning from the Office for Recreation, Sport and Racing or ODASA would allow neighbouring Councils to consider Open Space supply and demand holistically and more strategically. The Greater Adelaide Park Lands and the Greater Adelaide Open Space System. Clarify the definition of Public Space – this should refer to all open space that is publicly accessible. Local Open Space Targets should be explored to support increased access to Open Space for communities. This will provide spaces to reach the tree canopy targets. 	<p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p>	<p>Ensure clarity and consistency</p> <p>Update or provide definitions</p> <p>Key recommendation - 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.</p> <p>Key recommendation - Master planned and infill sites near the Adelaide Park Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.</p>
<p>Aboriginal cultural and heritage values</p>	<p>This section is supported but could be further expanded to provide long-term strategic objectives to develop Caring for Country Frameworks, Designing with Country Frameworks and Healthy Country Plans.</p> <p>Cultural mapping of Aboriginal heritage and value should also be expanded to include investigations into an Aboriginal Heritage overlay in the Planning and Design Code.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p> <p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Support with change</p> <p>Expand scope of Action 9</p>
<p>State and Local Heritage</p>	<p>Commend the inclusion of the UNESCO World Heritage Listing Bid for Adelaide and its Rural Settlement Landscapes. However, it is noted that there is no specific action associated with this bid.</p> <p>The UNESCO World heritage listing bid is a Strategic Priority in the Draft - <i>Adelaide Park Lands Management Strategy - Towards 2036</i>.</p> <p>This requires a partnership approach between the State Government and Local Government.</p>	<p><i>Heritage Strategy</i></p> <p><i>City Plan – Adelaide 2036</i></p> <p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p> <p><i>Kadaltilla / Adelaide Park Lands Authority Strategic Plan</i></p>	<p>Change recommended</p> <p>New Action</p> <p>Identify an action to promote/support the UNESCO World Heritage Listing Bid</p> <p>Include the opportunity for State Heritage Listing of the Adelaide Park Lands and City Layout in the GARP.</p> <p>Key recommendation - Strengthen the application and consideration of</p>

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	<p>State Heritage Listing of the Adelaide Park Lands and City Layout is also a Strategic Priority in the <i>Adelaide Park Lands Management Strategy - Towards 2036</i> and should be included in the GARP as a strategic objective as this would support the UNESCO bid.</p>	<p><i>National Heritage Management Plan for the Adelaide Park Lands and City Layout</i></p>	<p>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.</p>
<p>State and Local Heritage</p>	<p>Long-term strategic objective 1 needs to apply to development assessed by the State Commission Assessment Panel. An additional action is suggested to ensure heritage considerations for development assessed at this level.</p>	<p><i>Heritage Strategy</i> <i>City Plan – Adelaide 2036</i></p>	<p>Change recommended New Action That PLUS provides independent heritage advice to SCAP and be available to provide responses at SCAP meetings.</p>
<p>State and Local Heritage</p>	<p>The long-term strategic objectives are recommended to be strengthened and amended as follows:</p> <ul style="list-style-type: none"> • Stronger language is needed around contextually responsive development adjacent development and zoning that retains heritage values. • Embed State-level planning protections for National Heritage Places 	<p><i>Heritage Strategy</i> <i>City Plan – Adelaide 2036</i> <i>National Heritage Management Plan for the Adelaide Park Lands and City Layout</i></p>	<p>Change recommended Review and amend objectives:</p> <ul style="list-style-type: none"> • The words 'sympathetic', 'appropriate' need to be used in sentences relating to development and adaptive reuse. • Add 'and protect' to Objective 6. <p>Key recommendation - 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.</p>
<p>State and Local Heritage</p>	<p>Further acknowledgement is needed of the impacts of housing and growth targets on the planning policy framework that applies to heritage places and areas.</p>	<p><i>Heritage Strategy</i> <i>City Plan – Adelaide 2036</i></p>	<p>Clarification requested An additional action may be needed to recognise and investigate any changes needed – consideration should be given</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			to Historic Area Overlays, Building Style Guidelines, Extent of listing, curtilage, buffers etc
Landscape and Neighbourhood Character	In general, the long-term strategic objectives are supported and are in alignment with <i>City Plan – Adelaide 2036</i> , in particular Strategy 8 – Designing for Urban Life, Diversity and Density	<i>City Plan – Adelaide 2036</i>	Support
Landscape and Neighbourhood Character	The Long-term Strategic Objectives should include the Adelaide Park Lands as a landscape of high scenic quality that is safeguarded by legislation - <i>Adelaide Park Lands Act 2005</i> as well as recognising their regional and national significance.	<i>City Plan – Adelaide 2036</i> <i>Adelaide Park Lands Management Strategy – Towards 2036</i> <i>National Heritage Management Plan for the Adelaide Park Lands and City Layout</i>	Changes recommended Objective 3 should include in the long-term strategic objectives the protection of the Adelaide Park Lands landscapes, views and vistas. Insert new Objective 8. Retain the special qualities of the Adelaide Park Lands whilst recognising their regional and national significance.
Landscape and Neighbourhood Character	Support for demolition controls based on replacement building approval.	<i>Planning System Implementation Review Submission</i> <i>Code Amendment Program</i>	Change recommended Consider review of demolition controls in Historic Areas in addition to Character Areas.
Productive Economy			
Employment Lands	Recognition of the City of Adelaide's capital city role and large contribution to the State economy is needed. Complementary growth is supported whilst ensuring that investment is viable and supportive of the city's growth and investment aspirations. The continued clustering of economic activity in the city is paramount to the other growth aspirations across the state. The Employment map provides no context, detail or significance of the city as a key element to the State's growth.	<i>Economic Development Strategy – A thriving economy for all</i> <i>City Plan – Adelaide 2036</i>	Changes Recommended Request additional context about the important role of the capital city in the region. Insert new Objective 6 - Maintain and enhance the City of Adelaide's role in growth, and investment attraction and supporting a thriving, dynamic economy. Replace the content under Adelaide Central Business District (CBD)

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			<p>Employment Lands heading with the following:</p> <p><i>The City of Adelaide is at the heart of the Greater Adelaide region. It is the CBD, the economic epicentre, cultural core, higher education hub, centre of transit and supports liveability for all Greater Adelaide. The primacy of the city centre in Greater Adelaide has an important role in leading the direction of and supporting the growth of South Australia.</i></p> <p><i>As South Australia’s state capital, Adelaide is a major employer and economic driver, representing 18% of South Australia’s GSP and generating Gross Regional Product (GRP) of around \$23.95 billion (2022–23).</i></p> <p><i>The city provides opportunities for business growth and amenities in the public realm, attracting the skilled workers that will further grow businesses and increase population in Greater Adelaide.</i></p> <p><i>World class facilities add to the city’s attraction. The city hosts the Biomedical Precinct, Lot Fourteen Innovation Precinct as well as premier destinations for learning, entertainment, recreation and sporting activities.</i></p> <p><i>The Nationally Heritage Listed Adelaide Park Lands and Squares provide space for festivals and events whilst simultaneously increasing the city’s biodiversity and sustainability. The Adelaide Park Lands are a major recreational, sporting and tourism destination, providing an open space that connects the city to the surrounding</i></p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			<i>suburbs. They are also home to the Adelaide Botanic Gardens and Botanic Park/Tainmuntilla.</i>
Employment Lands	The City of Adelaide recognises and supports the alignment of Long-term Strategic objectives 3 and 5 with the outcomes anticipated in City Plan.	<i>City Plan – Adelaide 2036</i>	Support
State Innovation Places	<p>The City of Adelaide supports the focus on State Innovation Places and welcomes opportunities to partner and promote the important city-based innovation places, Lot Fourteen and BioMed City and their links to the city-based universities.</p> <p>The City of Adelaide also notes the release of South Australia’s Innovation Places Leadership Framework 2024-2034 and the Lot Fourteen Master Plan 2024.</p>	<i>Economic Development Strategy – A thriving economy for all</i>	Support
Activity Centres and Retail	Recognition of the CBD is supported.	<i>City Plan – Adelaide 2036</i>	<p>Change recommended</p> <p>Amendments to acknowledge that within the City of Adelaide there are a number of main street activity centres that function at a similar level to local and neighbourhood activity centres.</p> <p>Recognise the primacy of the CBD for retail.</p>
Activity Centres and Retail	The City of Adelaide recommends that further investigations and recognition of the importance of the nighttime economy, including planning for city’s use at night by residents and workers, not only for activities related to hospitality and visitor economies.	<i>Economic Development Strategy – A thriving economy for all</i>	<p>Changes recommended</p> <p>Undertake further investigations on the night-time economy and reflect in the final GARP.</p>
Tourism and Events	<p>The City of Adelaide as the capital city should be included in this section as a key tourist zone in the opening sentence.</p> <p>Specific tourist attractions should be mapped - particularly those of State and Regional significance.</p>	<i>Economic Development Strategy – A thriving economy for all</i>	<p>Change recommended</p> <p>Recognise the CBD as ‘More than the gateway to South Australia’ (as per the City of Adelaide Economic Development Strategy).</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			<p>Increase the profile of the City of Adelaide as a tourist destination for recreation as well as an important destination for business events.</p> <p>Potential to expand the mapping to include key tourist attractions, including - Adelaide Oval, Adelaide Zoo, Botanic Gardens, Adelaide Park Lands.</p>
Waste and Resource Recovery	Long-term strategic Objectives 3 and 4 align with a number of City of Adelaide strategies and plans.	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Economic Development Strategy – A thriving economy for all</i></p> <p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Adaptive Reuse City Housing Initiative</i></p>	Support
Waste and Resource Recovery	Given the significant housing growth proposed, with a focus on higher-density housing options, an additional strategic objective is recommended that ensures high and medium-density housing is designed to provide space for waste management / resource recovery systems and storage on site.	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Code Amendment Program</i></p>	<p>Change recommended</p> <p>New Objective</p> <p>Include an additional strategic objective to ensure new developments, particularly multi-unit dwellings are designed to provide space for at minimum 3-stream waste management / resource recovery systems and storage on site.</p>
Waste and Resource Recovery	<p>In addition to promoting adaptive reuse and designing new buildings for adaptability and/or disassembly, as part of the role of the planning system, greater importance needs to be placed on waste management plans and resource recovery of new building sites. This should be captured in the Waste Recovery section.</p> <p>It is recommended that this section acknowledge that the circular economy is much more than waste management</p>	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Economic Development Strategy – A thriving economy for all</i></p>	<p>Change recommended</p> <p>Review language and update.</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	<p>facilities. It is about systems and how they are interconnected so wider consideration is needed.</p> <p>A review of language is recommended to reflect more proactive terminology – i.e. ‘circular economy’, rather than ‘waste recovery’ which is considered reactive.</p> <p>The City of Adelaide supports recognition of the role of adaptive reuse in reducing greenhouse emissions but recommends expanding this statement to reference broader circular economy outcomes including material choice and connection to waste management facilities.</p> <p>In addition, space is needed to build the industries that will support collection/aggregation of materials for various outcomes like reuse, repair, sharing, repurposing and processing materials for recycling - not just management of the waste.</p> <p>Rather than an economic growth opportunity, it is suggested that waste management is becoming an economic development opportunity.</p>		
Environment Resources Landscape			
Biodiversity	The strategies for Biodiversity are supported with opportunity for further alignment with City of Adelaide strategies.	<p><i>Adelaide Park Lands Management Strategy - Towards 2036 – Draft</i></p> <p><i>City Plan – Adelaide 2036</i></p> <p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Support with changes</p> <p>Acknowledge the relationship between the natural landscapes and their traditional owners and include strategies or objectives to include cultural burning into the management of the natural landscapes.</p> <p>Embed (rather than investigate how to embed) Biodiversity Sensitive Urban Design</p>
Climate change	The long-term strategies for climate change are supported, however strengthening wording from ‘consider’ and ‘encourage’ to ‘ensure’ and ‘support’ is required especially when referring to decarbonising master planned neighbourhoods and investment in existing neighbourhoods, as well as avoiding carbon-based	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Housing Strategy – Investing in our housing future</i></p>	<p>Change recommended</p> <p>Review and update language.</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	<p>energy supplies and ensure adequate public transport, walkability and active travel.</p> <p>The City of Adelaide’s <i>Integrated Climate Strategy 2030</i> aims to triple the number of workers who cycle to work and double the number of local residents who walk to work; and aims for all home and business to be electrified and powered by renewables by 2030.</p> <p>As at the State-level, transport is now the largest contributor to the City of Adelaide community’s climate impact. Carbon emissions from transport have increased 71% from FY2020 to FY2024, driven by private vehicle travel to and from the city, requiring an interconnected approach to support public and active transport beyond the CBD.</p>		
Climate change	<p>There is an opportunity to reiterate circular economy principles and language in reference to public realm elements and public infrastructure – for example through procurement decisions that localise supply, prioritise reuse and drive green industries</p>	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Change recommended Review and update language.</p>
Urban Greening and Cooling	<p>Support the strategies for urban greening and cooling, however, these particularly focus on public realm cooling, whereas it is known that cooling of homes is critical to ensure comfort and affordability of running costs.</p> <p>The current tree policy work has a suburban focus, and further collaboration is required relating to establishing tree canopy in the CBD.</p> <p>The City of Adelaide <i>Integrated Climate Strategy 2030</i> aims for a cool city with no urban heat island effect facilitated by shading and materials changes and greening that is supported by sustainable water resources.</p>	<p><i>City Plan – Adelaide 2036</i> <i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Change recommended Recommend an additional strategy relating to thermal comfort inside homes. Establish specific tree policy for the city context.</p>
Emissions and Hazardous Activities	<p>Support for the strategies.</p>	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Support</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Transport & Infrastructure			
Outcome 5: An integrated and connected region	Many cities internationally set a clear intent to provide accessibility for children (to school, shops, playground, open space) and this would be welcomed.	<i>City Plan – Adelaide 2036</i>	<p>Changes recommended</p> <p>Consider refinements to language to reflect the people and communities that land use planning will support.</p>
Outcome 5: An integrated and connected region	Relevant transport layers should be inserted in the GARP to enable strategic coordination and delivery which will be further detailed though the State's Transport Strategy for South Australia and the City of Adelaide's updated Integrated Transport Strategy.	<i>City Plan – Adelaide 2036</i>	<p>Changes recommended</p> <p>Administration will provide the GIS-compatible layers.</p>
Strategic Transport Networks	There is positive reference to coordination of land use and transport planning which should be evident along corridors through planning for mass public transport.	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Change recommended</p> <p>Amend Strategy 1 as below:</p> <p>Residential and employment growth areas are sequenced and planned, to integrate and capitalise on existing and planning strategic transport infrastructure."</p>
Strategic Transport Networks	The Strategies should identify the importance of new development supporting the transition to low-carbon transport through adequate facilities such as storage and charging of e-bikes, e-vehicles, micro mobility, as well as providing opportunities for shared vehicle options in high-density areas to reduce the cost of living and the need for private vehicle storage and ownership.	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p>	<p>Changes recommended</p> <p>Amend Strategy 4 as below:</p> <p>Support the increased use of a wider variety of low emission transport modes including public transport, micro mobility, shared vehicles, walking and cycling to reduce the reliance on private vehicles.</p> <p>Amend Strategy 5 as below:</p> <p>Support an efficient transport system that contributes to reducing emissions and active travel for healthy communities.</p>
Strategic Transport Networks	City Shaping infrastructure includes the City Loop and Tram connecting North Adelaide and the City and active transport investments.	<i>City Plan – Adelaide 2036</i>	<p>Changes recommended</p> <p>Greater focus on Light Rail and alternative public transport modes.</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
		<i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i>	
Local Transport Networks	It is recommended that the Strategies be strengthened to include greater reference to Living Locally principles that underpin the GARP.	<i>City Plan – Adelaide 2036</i>	<p>Changes recommended</p> <p>Review language to strengthen links to Living Locally principles.</p>
Local Transport Networks	Strengthen policy support for people with a disability and people who have lower levels of mobility, as well as end-of-trip facilities for active transport.	<i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i>	<p>Change recommended</p> <p>Amend Strategy 6 as below:</p> <p>Growth areas to provide a local road network and urban form (such as storage for personal mobility devices, bikes and e-bikes) to support active travel.</p>
Social Infrastructure	Define social infrastructure in consideration in infrastructure schemes.	<i>City Plan – Adelaide 2036</i>	<p>Changes recommended</p> <p>Refer to State Development Co-ordination and Facilitation Bill.</p>
Social Infrastructure	<p>Recreation and sports facilities are key social infrastructure but also relate to open space.</p> <p>Further State-level guidance for Local Government on preparation of Local Sport and Recreation Plans would assist Councils in the prioritising and investment for sport infrastructure planning and highlight the role of significant open spaces, such as the Adelaide Park Lands.</p>	<i>Adelaide Park Lands Management Strategy – Towards 2036</i>	<p>Change recommended</p> <p>Recommend that a State-wide sporting infrastructure plan be developed to guide Local Government sport and recreation infrastructure planning.</p> <p>This may include indoor sport and recreation facilities in the CBD.</p>
Energy	<p>Demand reduction through passive design, retrofitting and adaptive reuse of existing buildings and compact walkable urban forms will play a large role in playing our part in the global effort to halt climate change and support a net zero city.</p> <p>Electrification is also key in South Australia where we have the world’s leading variable renewable electricity grid.</p>	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Investing in our Housing Future – Housing Strategy</i></p>	<p>Change recommended</p> <p>New Strategy:</p> <p>Support low-carbon energy systems by ensuring developments reduce energy demands through passive building design, adaptable designs and support low-carbon transport options.</p> <p>New Strategy</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			Preference electrification for all existing and new developments where technology permits.
Infrastructure Reserves and Corridors	<p>The City of Adelaide has experienced a number of pressures on the Adelaide Park Lands for infrastructure such as health, education and police facilities rather than regional open space.</p> <p>Accordingly, any land banking and allocation to support infrastructure demands are welcomed to ensure coordination of growth and infrastructure provision.</p>	<i>Adelaide Park Lands Management Strategy – Towards 2036</i>	Support
Delivery and Implementation			
Target 1 Residential land supply	<p>Most of the current city zoning includes opportunity for residential development.</p> <p>The City of Adelaide has identified sufficient capacity for anticipated residential growth with current zoning.</p>	<i>City Plan – Adelaide 2036</i>	Support
Target 2 Regional and Local Area Housing	CoA is not included in a Land Supply Region. The City of Adelaide has housing targets that exceed the annual targets sought through the draft GARP.	<i>Housing Strategy – Investing in our housing future</i>	Support The City of Adelaide encourages that this target includes diversity targets, and/or ensure measurement of homes built also captures housing type, housing size and tenure type.
Target 3 Employment Land Supply	Current zoning in the city facilitates employment without any changes required. Increased employment growth can occur in the city through densification rather than requiring land rezoning.	<i>City Plan – Adelaide 2036</i> <i>Economic Development Strategy – A thriving economy for all</i>	Support
Target 4 Urban Tree Canopy	<p>By 2030 all local government areas to increase tree canopy (3m or >) cover by 2% over residential and open space areas (excluding industrial and infrastructure).</p> <p>The City of Adelaide has set tree canopy targets. Currently there is 33% canopy cover in streets and parks up from 27.6% in 2022.</p>	<i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i>	Support CoA encourages separate consideration and targets for government and private land.

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<p>Action Table - The City of Adelaide acknowledges the 37 actions that will be taken to deliver the GARP outcomes. The following actions are applicable to the CoA (coastal and greenfield/township actions etc are excluded)</p>			
<p>Short Term Actions</p>	<p>An adaptive reuse planning framework and toolkit (like the proposed regenerative planning framework and toolkit) and development of a promotional strategy that encourages implementation of adaptive reuse is recommended.</p>	<p><i>City Plan – Adelaide 2036</i> <i>Housing Strategy – Investing in our Housing Future</i> <i>Adaptive Reuse City Housing Initiative</i></p>	<p>Change requested</p> <p>New Action:</p> <p>Formalise an adaptive reuse planning framework and toolkit and develop a promotional strategy that encourages implementation of adaptive reuse.</p> <p>Key recommendation - 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.</p>
<p>Action 1 – Strategic Sites</p>	<p>The City of Adelaide supports the proposed investigations and welcomes the opportunity to assist the State Government’s investigations. It notes previous advice to the State Planning Commission that the Council does not support existing catalyst site policy and seeks to review the definition and policy for strategic sites.</p>	<p><i>City Plan – Adelaide 2036</i> <i>CoA Code Amendment Program</i></p>	<p>Support</p> <p>Key recommendation - 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).</p>
<p>Action 4 – Local Government Strategic Planning</p>	<p><i>Local Governments to undertake strategic planning for their local area to plan for the implementation of housing and employment growth targets and identify infrastructure requirements (2 years).</i></p> <p>The City of Adelaide has finalised the following strategies and plans in the past 12 months.</p> <ul style="list-style-type: none"> • City Plan – Adelaide 2036 • Housing Strategy • Economic Development Strategy • Integrated Climate Strategy • Homelessness Strategy 	<p><i>City Plan – Adelaide 2036</i> <i>Housing Strategy – Investing in our Housing Future</i> <i>Economic Development Strategy – A thriving economy for all</i> <i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i> <i>Homelessness Strategy – Everyone’s Business</i></p>	<p>Change requested</p> <p>Key recommendation - 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.</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	<ul style="list-style-type: none"> • Social Infrastructure Assessment <p>Investigations are currently underway for an Integrated Transport Strategy and a Social Infrastructure (Assets) Policy to be finalised in 2025.</p> <p>Together these plans and strategies fulfil Council's obligations under Action 4.</p>	<p><i>Social Infrastructure Assessment</i></p>	
<p>Action 6 – Code Amendment to increase building heights in the CBD</p>	<p><i>City Plan – Adelaide 2036</i> should be used to guide where building heights are reviewed and to what extent. This will ensure that the development potential created, through increased building heights, matches the spatial outcomes identified in <i>City Plan – Adelaide 2036</i> and that the land economics do not adversely impact on development and infrastructure outcomes in the city.</p> <p>The 'Missing Middle' concept also applies to the city. City of Adelaide would also like to explore whether there are areas of the city where heights could be reviewed (increased and/or decreased). Research undertaken through the development of the Housing Strategy and the City Plan suggests that alternate housing models are more likely to be achieved where the policy supports medium-rise development.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our Housing Future</i></p> <p><i>Economic Development Strategy – A thriving economy for all</i></p>	<p>Support</p> <p>The City of Adelaide seeks to collaborate on this Code Amendment to ensure alignment with <i>City Plan – Adelaide 2036</i>.</p>
<p>Action 7 – Code Amendment and Policy Review for Urban Corridors</p>	<p>While not specifically relevant to the City of Adelaide this policy review relates to similar issues raised by the City of Adelaide about catalyst site policies (5 years).</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Planning System Implementation Review</i></p>	<p>Change requested</p> <p>Key recommendation - Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).</p>
<p>Action 11 – Affordable Housing Overlay</p>	<p>City Plan – Adelaide 2036 and the Housing Strategy – Investing in our housing future both seek greater provision of affordable housing within the city.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our Housing Future</i></p> <p><i>Code Amendment Program</i></p>	<p>Change requested</p> <p>Key recommendation - 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.</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
<p>Action 12 – Affordable Housing Offset Scheme</p>	<p>The development of an Affordable Housing Offset Scheme is supported in principle, and the City of Adelaide would welcome the opportunity to work with the State Government on the development of the Scheme to ensure that outcomes are delivered in proximity to the main development sites.</p> <p>The City of Adelaide recommends a review of the Affordable Housing program as part of the development of an Offset Scheme as the current program, where the majority of affordable housing products are only available off the plan, is not achieving the desired outcome.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our Housing Future</i></p> <p><i>Code Amendment Program</i></p>	<p>Change requested</p> <p>Key recommendation - 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.</p>
<p>Action 13 – Governance and Funding Models for Regional Open Space</p>	<p>A new funding and governance arrangement for the Adelaide Park Lands would need to result in new or additional funding pathways to support the enhancement and protection of the Adelaide Park Lands.</p> <p>There is a need for Capital Investment to align with the <i>Adelaide Park Lands Management Strategy – Towards 2036</i> and priorities of Council for the Adelaide Park Lands and Squares. This should take into consideration the important role that the Adelaide Park Lands play and the significant commitment and contribution the City of Adelaide has in place for the Adelaide Park Lands.</p> <p>Significant opportunities exist to review the funding of the Adelaide Park Lands, including through mechanisms such as:</p> <p>Adelaide Park Lands Fund (Part 5 of the <i>Adelaide Park Lands Act 2005</i>)</p> <p>Investigate the establishment of an Adelaide Park Lands Open Space Off-set Scheme through the <i>Planning, Development and Infrastructure Act 2016</i></p> <p>Yearly allocation from the Planning and Development Fund.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p>	<p>Further information required</p> <p>Any changes to the funding or governance of the Adelaide Park Lands must be undertaken in consultation with Kadaltilla/Adelaide Park Lands Authority and the City of Adelaide.</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Action 16 – Biodiversity Mapping	The City of Adelaide has recently undertaken a Biodiversity Survey of the Adelaide Park Lands which includes detailed spatial mapping and a Technical Findings Report that highlights the important role the Adelaide Park Lands play to biodiversity, including identifying rarely-recorded and threatened species. 15.8% of the Adelaide Park Lands are managed as Key Biodiversity Areas.	<i>Adelaide Park Lands Management Strategy - Towards 2036</i> <i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i>	Change recommended Include areas of high Biodiversity in the spatial mapping of the GARP that fall outside of national parks and native vegetation areas – e.g. Adelaide Park Lands. Add a Strategy or Action to investigate a biodiversity Overlay in the Planning and Design Code.
Action 21 – Pilot Infrastructure Scheme	The City of Adelaide encourages the implementation of infrastructure schemes across the state to ensure that value is captured from rezoning to enable infrastructure to be sequenced with the delivery of new housing.	<i>City Plan – Adelaide 2036</i>	Support
Action 22 – State Transport Strategy	The City of Adelaide supports the development of the State Transport Strategy and welcomes the opportunity to provide feedback when it is released for public consultation.	The City of Adelaide is preparing an Integrated Transport Strategy for finalisation in 2025.	Key recommendation - 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.
Action 25 – Social Infrastructure Benchmarks	Social Infrastructure Benchmarks are applicable across all areas, not just growth areas, given the infill potential in existing suburbs. The City of Adelaide has undertaken a Social Infrastructure Assessment, including benchmarking of key social infrastructure. The City of Adelaide would welcome the opportunity to assist in informing the development of benchmarks and the implementation of a scheme of measurement.	<i>Social Infrastructure Assessment</i> <i>GARP Discussion Paper submission</i>	Support An agreed definition of social infrastructure is also recommended to be developed.
Action 27 – Infill Design Guidelines	The City of Adelaide recommends that the timeframe for the development of these Guidelines is brought forward to support anticipated growth.	<i>City Plan – Adelaide 2036</i> <i>Housing Strategy – Investing in our Housing Future</i>	Support Bring forward the timeline for implementation.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Action 28 – General Infill Design Quality	<p>Design-quality guidance is needed in the Planning and Design Code as a matter of high priority relating to all housing types, particularly medium and high-density, including for new ‘missing middle’ housing forms and apartments.</p> <p>The Code Amendment should include adaptive reuse opportunities and waste-management design policies for all forms of housing.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our Housing Future</i></p>	<p>Support</p> <p>Bring forward the timeline for implementation.</p>
Action 30 – Adaptive reuse of heritage places	<p>The City of Adelaide advocated for this outcome in our submission to the GARP Discussion Paper.</p>	<p><i>City Plan – Adelaide 2036</i></p> <p><i>Housing Strategy – Investing in our Housing Future</i></p> <p><i>Adaptive Reuse City Housing Initiative</i></p> <p><i>GARP Discussion Paper submission</i></p>	<p>Support</p>
Action 33 – Land Supply Dashboard – Employment and Infrastructure Reporting	<p>Updates to the Land Supply Dashboard to provide greater transparency and reporting on land supply and infrastructure provision.</p>	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Adaptive Reuse City Housing Initiative</i></p>	<p>Support</p>
Action 35 – Urban Tree Canopy Overlay	<p>This action does not propose any changes to application of the Overlay within the City of Adelaide; measures to increase urban tree canopy across the region are supported.</p>	<p><i>City Plan – Adelaide 2036</i></p>	<p>Support</p>
Action 37 – Regenerative Toolkit	<p>Support moving beyond sustainability to regenerative future.</p>	<p><i>Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable</i></p> <p><i>Adelaide Park Lands Management Strategy – Towards 2036</i></p>	<p>Support</p>

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Greater Adelaide Land Supply Regions Adelaide City	The introduction to 'Adelaide City' should include reference to the National Heritage-listed Adelaide Park Lands, that provide significant quality open space to the city and surrounding suburbs; and recognise that housing diversity in the City is more than purpose-built student accommodation.	<i>Adelaide Park Lands Management Strategy – Towards 2036</i> <i>City Plan – Adelaide 2036</i>	Change requested Refine description of Adelaide City with the City of Adelaide.

Digital Mapping

A key element of City Plan is the digital explorer (CoADE) that includes over 400 data layers of spatial information. The City of Adelaide sees an opportunity for some of these layers to be included in the GARP.

Technical/Editorial comments

- References to City of Adelaide as the Local Government Area need to be clearly differentiated from Metropolitan Adelaide or Greater Adelaide.
- *Figure 41 - Population projection for City of Adelaide LGA* uses has incorrect population numbers.
- The map icon of the CBD should be located near King William Street and Rundle Mall to better reflect the CBD location.
- References to the Adelaide Park Lands need to be checked for consistency throughout.
- The user experience of the Digital Portal would be improved with the ability to do comprehensive 'word searches'.
- Adelaide City - Infrastructure considerations – remove the word Kadaltilla from paragraph 6 – this is an incorrect reference.