

30/09/2009

Submission to Draft Plan for Greater Adelaide

Friends of Willunga Basin (FOWB) thank the Department of Planning & Local Government for this opportunity to contribute to what we believe to be critically important changes to Greater Adelaide's development.

Issues of sustainability and wise planning have been core interests of our organisation since its inception 20 years ago. Although the issues addressed in this draft plan are not new, the imperative of dealing the following issues is now critical:

- The need to decarbonise our way of living in response to climate change
- Looming liquid fuel scarcity (peak oil)
- The need to protect food security – like viable agricultural land protection (especially in the light of Murray Darling Basin's possible demise as a food bowl)
- the ageing population
- diminishing household sizes
- population increase

It is interesting to note in The Advertiser's 'Green Card' published each Monday that petroleum accounts for 52% of the State's carbon pollution (The Advertiser 28/9/09). This highlights the very large role that transport fuels play in adding to carbon pollution.

It is also interesting to note that the US National Transportation Research Board's recent report Driving and the Built Environment. It examined the contribution that development patterns play in climate change and our energy use, concluding that "policies that support more compact, mixed-use development and reinforce its ability to reduce vehicle miles travelled (VMT), energy use, and CO2 emissions should be encouraged."

The report found that coupling more compact development with better street connectivity, public transportation improvements, and other complementary measures would result in a 25 percent reduction in vehicle miles travelled.

We wish to make clear at this point that Friends of Willunga Basin strongly question the State Government's desire to increase population to two million people, increasing strains on our fragile and dry environment.

In broad terms we believe this draft plan to be a sound document, responding responsibly and sensibly to the above and other issues. While at risk of being parochial 'nimbys' in desiring that growth be centred around transit nodes to the North, we believe there are excellent sustainability, equity and planning reasons for increasing density in existing suburban areas.

The new focus on transit oriented and pedestrian oriented planning is very strongly supported by us, as is the introduction of cycling as serious transport.

Friends of Willunga Basin also state that we fully support the submission of the Southern Community Coalition (lodged in the name of Mr Jim Hullick). Friends of Willunga Basin is member groups of that coalition.

Specific Comments on Planning the Adelaide we all want – Progressing the 30-year plan for Greater Adelaide

Reference	Comment
Page III	We note Connor Holmes helped prepare the document; they did the Urban Boundary report – conflict of interests? We have ongoing concerns that the development industry has way too much influence in the planning, the community is largely excluded.
Page 14 in The characteristics of the new urban form	We believe that the ratio of fringe to infill proposed (30:70) is way too high for the target for fringe, there needs to be far less fringe.
Page 16 first and fifth dot points	We are concerned at the excessive role of Cabinet in making decisions and fast tracking at the expense of good planning by professionals and with due consideration of the community view
Page 21 4 th dot point	Again we are concerned that fast tracking can lead to bad planning decisions with minimal community input
Page 41 Creating the preconditions for strong economic performance	We believe the abolition of stamp duty to be an important step to improve housing affordability. High costs of changing properties are a disincentive for people to move to more suitable housing as their situation changes.
Page 43	We strongly endorse the need for reducing car dependence in the light of climate change, peak oil, equity and congestion. We believe peak oil does not receive the attention it deserves as a great threat to the way of life of our sprawling car dependant cities.
Page 57 first dot point	We strongly endorse the sentiments concerning protection of primary production land and townships/villages.
Page 85	The sparing of Willunga Basin from extensive proposed urban expansion, long term urban growth and long term investigation is strongly supported. The Basin must be preserved as a predominantly rural area due to its value for wine and tourism, and in the long term future perhaps critical food production utilising reclaimed water.
Page 90 Population	FOWB strongly oppose the plan to increase the state population growth target and thus oppose the need to plan for an additional 560,000 people. The need to respect limits to growth in use of resources requires limits to growth of population. Ultimately Australia is likely to receive huge numbers of climate change refugees, at this time population expansion must not be pursued.
Page 94, 95 Housing	FOWB endorse the draft policies except the number of new dwellings proposed. We believe the number of new dwellings in Southern Adelaide Region in fringe growth and townships (9000) is too high.

Page 97 Housing affordability	We support these draft policies
Page 106 Primary Production	CSIRO and climatologists predict a serious decline in Murray Darling Basin in the future, climate change massively threatens food production in a global sense with potential loss of monsoon rains etc. Land suitable for agriculture must be protected for the need for food security, especially where reclaimed water is available. Thus, should wine production cease to be a major industry, the vineyard areas must be preserved for agricultural use.
Page 115 Transport	FOWB support the general rationale, we particularly support the identification of a transit route to Aldinga and the extension of the new rail link beyond Seaford to Seaford Heights. FOWB very strongly support transit oriented development and agree that governance issues must be addressed. Adelaide has for too long been developed more at the whim of developers than for the sane planning for a low-carbon low-car dependence future.
Page 118	There need to be additional off road cycling routes, including links throughout the tourism areas of Willunga Basin and the Barossa. These will be major tourist attractions as well as being important in areas where traffic speeds are higher and roads often narrow.
Page 127-129 Biodiversity	FOWB support the draft policies. We note that the Washpool, south of Aldinga Scrub has not been included on this map. The washpool is a very important site of environmental significance, but due to fragmentation of ownership at this time it has yet to be added to the Aldinga Conservation Park.
Page 132 Open Space	FOWB endorses the draft targets, in particular the development of waterway linear parks as stated and the coastal linear park from Sellicks Beach.
Page 136 Climate Change	The rationale and draft policy 1 are very strongly supported. This is an incredibly important issue.
Page 137 Climate Change	Draft policies 1 to 4, 6, 8, 10 to 16 are all supported. Draft policy 5 is not strong enough, 6 star rating will not suffice to achieve the cuts in carbon pollution and energy use required. Draft policy 7 should include all new housing, not just 'the bulk of new housing'. Draft policy 9 should not limit the need for an energy efficiency target for only larger developments, even small ones should have a target.
Page 138	FOWB endorse these targets
Page 139	FOWB endorse the draft targets
Page 140-143	FOWB supports the widest stormwater reclamation feasible and expansion of the requirement for rain water capture from buildings and its use .

Page 156 Effective management of land supply	We strongly oppose the State Strategic Plan target for population increase – it is not environmentally sustainable for our arid dry state without massive energy inputs - in the face of decarbonisation of the economy.
Page 172 Southern Adelaide Population and Dwellings targets	The targets for townships (500) and for fringe growth (3500) are too high, they should be reduced to 300 and 2500.
Page 173	There is an error in the map indicating Hills Face zoning for land between Sellicks and Aldinga Scrub and adjacent to McLaren Vale township.
Page 187 Structure Plans	We concur with the idea of structure plans, however they must be developed in close consultation with the community.
Pages 190-192	These draft policies are all supported
Page 193	Draft policy 1 the phrase ' <i>self contained</i> ' needs clarification. Draft policy 3 should include minimising impacts of high present of potential agricultural value for food security reasons. Draft policy 10 requires commentary about the quality of open space, especially in areas of high density living. Draft policy 14 Only townships with present or potential for high speed transit should have more than minor development Draft policy 15 is strongly endorsed.
Page 196 Population	We repeat our very strong objection to the proposed dramatic expansion of the State population. This would seem to be developer and housing industry driven, not the wish of the community
Page 197	We question the need for substantial areas of land for fringe development for a society that must decarbonise within 40 short years (many climate scientists are calling for an 80 to 100% reduction of CO2 equivalent by 2050)
Page 198 Housing affordability	We support the points, but believe that a substantial part of affordable housing should be in public ownership.
Page 199 Health and wellbeing	We strongly endorse the points, but wish to add a greater emphasis on cycling facilities for serious transport, not just recreation. We particularly endorse Draft policy 3, the protection of high quality food bowl areas. With the Murray Darling Basin under threat from climate change areas with access to recycled water will be of inestimable value for food production.
Page 201 Primary Production	We strongly endorse the draft policies, especially paragraphs 3 and 4
Page 203 Green Industries	FOWB strongly support draft policies 1-3
Page 207 Open	We would like to see draft policy 1 expanded to include visual

Space, sport & recreation	amenity of views and vistas in the evaluation of quality open space. We endorse paragraph 6, however in areas like Willunga Basin it should also include rural areas outside the Hills Face zone.
Page 208 Greenways	We strongly endorse the draft policies
	This is way too weak in the efficiency requirements for new buildings. The residential buildings created today will be in use in 2050, by which time we have to have a near zero carbon footprint. Housing design must be of the highest efficiency, both in embedded energy and in performance. Design dependant on air conditioning is no longer appropriate. Furthermore we have to have housing more able to withstand extremes of weather conditions.
Page 209 Climate Change Paragraph 9	While agreeing on the need for carbon efficient housing & targets for energy efficiency, it must not be limited to only larger developments. The embedded energy of building construction should also be considered.
Page 209 Climate Change	We endorse the draft policies
Page 210 Climate change	Insert the word 'greatly' before <i>improved energy efficiency standards for new buildings</i> .
Page 211 Water paragraph 3	We do not accept the deferral until 2015 the need for sourcing outdoor water from non potable supplies.

Conclusion

Friends of Willunga Basin believe the protection of the Willunga Basin area to be of such significance that specific legislation to enshrine such protection from inappropriate development is required. Such legislation has been talked about since the time of the Memorandum of Understanding between the District Council of Willunga and the Government concerning the protection of agriculture of the Willunga Basin east of South Road. With the threat of increased population and climate change that legislation is required now.

Friends of Willunga Basin confirm our general support for the draft 30 year plan with the comments tabulated above. Their successful implementation would lead to a city far more able to deal with challenges that lie ahead.

Signed: Chris Davies

Chair, Friends of Willunga Basin