



CITY OF
ADELAIDE

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Reference: ACC2024/81724

4 July 2024

Jim Betts
Secretary of the Department of Infrastructure, Transport,
Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Submitted via email to urbanpolicyinput@infrastructure.gov.au

Dear Secretary Betts

The City of Adelaide (CoA) welcomes the opportunity to provide a submission on the draft National Urban Policy. The CoA commends the Federal Government's intent to develop a shared vision, incorporating Aboriginal and Torres Strait Islander people's perspectives, for sustainable growth in our cities and suburbs. The CoA supports efforts to better integrate policies, programs and investments across portfolios and levels of government.

The CoA broadly supports the five key goals and six objectives outlined in the draft Policy:

1. No-one and no place left behind
2. All people belong and are welcome
3. Our urban areas are safe
4. Our urban areas are sustainable
5. Our urban environments and communities promote health and wellbeing
6. Our urban areas promote productivity.

The outlined goals and objectives align with the CoA's [Strategic Plan 2024-2028](#), which sets a vision for Adelaide that is bold, aspirational and innovative. For the CoA, achieving our vision for the future will be guided by our long-term aspirations:

1. Our Community: Vibrant, connected and inclusive
2. Our Environment: Resilient, protected and sustainable
3. Our Economy: Growing, innovative and responsive
4. Our Places: Interesting, purposeful and safe.

The CoA encourages the Federal Government to consider the role of urban design and planning in the National Urban Policy and recognise as an objective the importance of nature-positive urban design for successful urban policy.

The draft National Urban Policy proposes actions against each objective that outline how all levels of government can work together to achieve sustainable growth in our cities and suburbs. The CoA strongly encourages the Federal Government to implement these actions to address the urgent challenges facing our cities and deliver on a shared vision.

In particular, the CoA welcomes support to grow our residential population whilst amplifying liveability in the context of Adelaide, incorporating culture, identity, climate and sustainability. Considerations relating to population growth include approaches to migration that enable the city to attract the skills we need now and into the future. The

The City of Adelaide acknowledges the Kaurna people as the Traditional Owners of the Country where the city of Adelaide is situated, and pays its respect to Elders past, present and emerging.



CoA's Strategic Plan 2024-2028 aims to increase the number of people living in the city from 26,000 to 50,000 by 2036.

To do this, the CoA values approaches, including co-investment on shared priorities, that contribute to the delivery of essential infrastructure and local services required to drive affordable, safe, and quality housing outcomes that attract and retain residents in our city.

The Lord Mayor, select Council Members and Senior Executive Members of the CoA attended the Consultation Workshop facilitated by KPMG on Friday 28 June 2024 in the Adelaide Town Hall. At the end of the session, KPMG facilitators sought recommendations for action from the Federal Government to meet these objectives. The CoA's 'big asks' for the Federal Government were as follows:

- A social infrastructure investment program, noting that there are existing pathways for road and public transport infrastructure, but social infrastructure currently has no equivalent pathway. This may be via a co-contribution approach.
- Further reform of the National Construction Code to provide additional performance-based pathways for the redevelopment of stranded assets to be retrofitted, as well as a consistent method of embodied carbon measurement and its calculation toward meeting sustainability outcomes sought in Section J.
- Leadership in government procurement and leasing to fund building upgrades and occupy existing stranded assets rather than simply occupy new high-performance tenancies.
- Funding of an urban climate resilience and adaptation program, particularly as it relates to capital city infrastructure which has benefits far beyond local government boundaries.
- A national definition of affordability and shared approach to regional and remote visitors including transitional accommodation.
- Faster and more frequent data sharing across a wide range of metrics.

The attached document outlines the key areas where the CoA is calling for Federal Government intervention or support to deliver a shared vision for sustainable growth.

Yours sincerely



Tom McCready
Acting Chief Executive Officer

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1. City of Adelaide Submission – draft National Urban Policy

CITY OF ADELAIDE SUBMISSION

NATIONAL URBAN POLICY – CONSULTATION DRAFT

The City of Adelaide's submission is structured under the six Australian Government objectives contained in the consultation draft dated May 2024:

1. No-one and no place left behind
2. All people belong and are welcome
3. Our urban areas are safe
4. Our urban areas are sustainable
5. Our urban environments and communities promote health and wellbeing
6. Our urban areas promote productivity.

OBJECTIVE 1 – NO-ONE AND NO PLACE LEFT BEHIND

Support for infill development and urban development patterns that support population growth

Densification through infill development, adaptive reuse and retrofit must play a significant role in meeting Objective 1. This is to deliver growth that is sustainable, meets contemporary expectations and emerging climate reporting standards and maximises public expenditure by building upon existing infrastructure and services. This requires careful and well executed investment in social infrastructure, housing, essential infrastructure and transport to support a growing population.

Through the [draft City Plan – Adelaide 2036](#), the CoA has outlined the spatial plan for the sustainable growth and development of the city. It provides an urban design framework to guide planning within the CoA, working towards a target population of 50,000 residents by 2036 – double its current population. This Council target is supported by the Government of South Australia.

Investing in establishing inner-city areas minimises capital expenditure on new and expensive essential infrastructure, which also adds to long term maintenance burden for local and State governments. This approach also optimises existing public transport channels and maximises return on investment for taxpayers and government.

The City of Adelaide (CoA) encourages the Federal Government to invest in existing urban areas to support densification and deliver urban areas that are well connected, liveable and resilient.

The CoA requires support from the State and Federal Government to deliver on the ambitions of the City Plan and unlock the growth potential of the city. This includes:

- *Supporting planning policy reforms that deliver quality housing outcomes, a range of housing typologies, include affordable housing options, and encourages good public realm outcomes. Support to deliver and maintain urban greening to ensure our urban spaces are climate resilient as well as pleasant places to live and work.*
- *Investment in social and civic infrastructure to ensure that current and future residents have access to the local services they require.*
- *Supporting transportation mode shift, including improved cycling networks, and cool and green streets that are pleasant to walk in, and an expanded public transport*

network that includes expansion of light rail connections and ring routes for the city centre.

- *A development profile that maintains cultural and heritage outcomes for the CBD and North Adelaide that continue to foster diverse housing typologies, green and functional civic spaces, interfaces with the Adelaide Park Lands and sustaining a strong open space and event and festival overlay across our Squares, Adelaide Park Lands and urban form.*

More support needed to deliver affordable housing

The availability of secure, appropriate and affordable rental housing is a key component in ensuring no one is left behind. Local government's role in housing is increasing due to market failure and the need for advocacy for changes to the private rental system. In recognition of this role, the CoA has recently prepared a [Housing Strategy - Investing in our Housing Future](#) that outlines Council's commitment to making appropriate interventions to foster and grow affordable, accessible and sustainable housing in the city. The Housing Strategy identifies the need for a multi-faceted approach to housing growth with partnerships between local and State governments, community housing providers and the private sector to achieve housing outcomes beneficial to the community.

There is strong alignment between Federal, State and local governments on the need to prioritise access to housing. The Federal Government has an opportunity to leverage this alignment for the benefit of all Australians by working with local and State governments to ensure the fulfilment of affordable and appropriate housing as a human right for its residents.

The CoA seeks recognition of the increased costs to develop in inner city locations in the criteria for Housing Australia Future Fund Facility (HAFFF), to facilitate delivery of affordable housing in capital city local government areas.

Nationally uniform definition for affordable housing

Definitions of affordable housing vary nationally. The South Australian definition of affordable housing identifies a price point at which housing (or land) can be offered for sale. Aligning the Gazetted sale price to market prices impacts the affordability of housing (for purchase) under this approach when market values are increasing. In addition, State Governments should be required to legislate an affordable rental price.

We would extend this request for the use of other terms to be uniform to remove potential ambiguity, these include:

- Accessible Housing – at price points for relative household incomes
- Transitional Housing
- Social Housing.

An alignment of key definitions and terms that include affordable housing, affordable rental, accessible housing, homelessness measures, and others will aid in aligning the national approach.

Expand support for those in need

The CoA strongly supports the Federal Government's proposed action to expand support for homelessness services, investment in social and affordable housing, and rental assistance. The CoA encourages recognition in Objective 1 of the key role that local governments play in supporting and delivering services to our most vulnerable residents.

Local governments are often on the front line and require the resources to assist those in need. There is greater pressure on local governments to manage community expectations, public safety and amenity. Local government experience is that community facilities such as libraries and community centres are increasingly being called on to support users with complex needs. This places greater pressure on resourcing these services and additional support to a workforce that has not traditionally been required to provide such support.

Funding for Homelessness Services is provided by the Federal, State and Territory Governments under the National Housing and Homelessness Agreement (NHHA). The NHHA outlines the Roles of Government and notes that:

- Local governments operate under State regulation and are not Parties to this Agreement. Local governments, and the Australian Capital Territory and the Northern Territory Governments, are responsible for:
 - Building approval processes
 - Local urban planning and development approval processes
 - Rates and charges that influence housing affordability.

This outline omits a key responsibility of local governments to foster community wellbeing as articulated in the *South Australian Local Government Act 1999*, Section 6 – Principal role of a council.

A council is, under the system of local government established by this Act, established to provide for the government and management of its area at the local level and, in particular –

- *to act as a representative, informed and responsible decision-maker in the interests of its community; and*
- *to provide and co-ordinate various public services and facilities and to develop its community and resources in a socially just and ecologically sustainable manner; and*
- *to encourage and develop initiatives within its community for improving the quality of life of the community; and*
- *to represent the interests of its community to the wider community; and*
- *to exercise, perform and discharge the powers, functions and duties of local government under this and other Acts in relation to the area for which it is constituted.*

Increasing rates of homelessness are having a deleterious impact on community wellbeing at the local government level. As homelessness becomes more visible in the community, residents and businesses expect urgent government response with the first contact often to local government. Although the remit of local government outlined in the Act is general in nature, community expectations are that local governments respond to homelessness with actions ranging from relocating people to providing transitional or permanent housing for people experiencing homelessness.

The CoA [Homelessness Strategy – Everyone’s Business \(2024\)](#), outlines a commitment to lead actions that will leverage planning policy to facilitate improved housing supply and choice.

Increased Federal Government funding is required for immediate outcomes that support emergency and transitional accommodation and social housing while exploring long term innovative financing to encourage investment in social and affordable housing.

The CoA strongly supports the Federal Government’s proposed action to expand support for homelessness services, investment in social and affordable housing, and rental assistance.

We seek to partner with the State and Federal Governments to develop a shared national definition of homelessness.

Improve data capture and better integrate data and projections into planning processes

The CoA is committed to being a data-led organisation, notably using rich data sets to inform the development of the draft City Plan – Adelaide 2036 and the draft Adelaide Park Lands Management Strategy. Access to reliable, consistent and affordable data is essential if local governments are to continue to deliver policies and programs that are informed by data, as well as the tracking and reporting of progress.

The CoA encourages the Federal Government to deliver on its proposal to invest in data gathering capabilities and to improve data capture and better integrate data and projections in planning processes.

OBJECTIVE 2 – ALL PEOPLE BELONG AND ARE WELCOME

Preservation of Aboriginal and Torres Strait Islander cultural heritage

The CoA agrees that it is imperative that all levels of government work together to create dedicated places for cultural practices and identify significant cultural sites. The CoA has recently completed stage one of a Kaurna cultural mapping project to capture sites and stories of significance while also creating opportunities for truth-telling and reconciliation.

CoA has finalised a draft of its [11th Reconciliation Action Plan](#) and is strongly committed to ensuring Aboriginal and Torres Strait Islander people belong and are welcome.

Federal Government leadership is required to finalise and implement a National Anti-Racism Strategy to improve experiences of safety and wellbeing for Aboriginal and Torres Strait Islander people.

Support for disability access and inclusion

Objective 2 notes the challenges regarding equitable participation in community life, particularly for people with disability and older people. Specific investment in addressing these challenges is required and should be clearly outlined in the corresponding actions. Partnering with local government is an effective way to address these issues.

Through its 2024 Disability Access and Inclusion Plan, CoA is seeking to remove barriers to participation and allow people living with a disability to fully participate in their community and has invested \$215,000 in 2024/25 to progress outcomes within this Strategy.

Federal Government leadership through a focus on the quality of services for people with a disability, and prioritising improved awareness and changing community attitudes towards people with a disability will support the CoA in its own endeavours.

Support access to the arts and culture

As a creative city, Adelaide is a magnet for a more diverse population of residents and local, state and international visitors. CoA is an exemplar of city planning and is focused on future planning for an affordable city where artists and other creatives can live, produce and sell their work.

Public art is an expression of Adelaide's cultural richness and creativity. It reflects how we express who we are as individuals and our community identity. Public art is for everyone, encouraging people to engage with place. It adds vibrancy and reflects the city's unique identity, its people, and their stories.

The CoA is seeking support from the Federal Government to continue the growth of the events and festivals industry, through building our capacity to present work in the public realm, noting Adelaide's position as a premier global destination for Festivals.

The CoA also advocates to the State Government and private sector for affordable housing, studio and retail spaces, as well as presentation opportunities for creatives in our city. The CoA is seeking additional support for these initiatives in the draft National Urban Policy.

Support for families living in urban areas

The CoA encourages the Federal Government to improve legacy infrastructure and facilities to support urban communities to grow.

As set out in the [City of Adelaide Strategic Plan 2024 -2028](#), CoA aims to increase the share of family households from 12.5% to 15% living in the city. The CoA's Housing Strategy seeks diversity of housing to support families to enjoy the convenience and advantages of living in the city centre. At the last Census the City of Adelaide had over 40% single person households, in part due to rates of student accommodation, which is a unique challenge to increasing housing supply and diversity.

Housing for families in the city centre will require support from the State and Federal Government to deliver the services and amenities that families require, including access to schools, childcare facilities, safe open spaces including playgrounds, as well as essential services like doctors, chemists and supermarkets

OBJECTIVE 3 – OUR URBAN AREAS ARE SAFE

Working together towards community safety and wellbeing

Community safety is a complex issue and governments, communities and businesses at all levels need to be collaborative and actively engaged to create safe communities.

State Governments have a strong role to play in relation to safety through responsibilities for law and order, crime prevention, public housing, health and public transport.

CoA works to improve safety through its influence over design and management of the public realm. In addition, as outlined under Objective 1, local governments in South Australia have a legislative responsibility to foster wellbeing and improve quality of life.

Designing out crime through initial investment in the public realm brings about long-term savings to the community through reduced spending on maintenance, surveillance, reporting, and replacing vandalised or missing items.

CoA supports proposals in the National Urban Policy to collaborate on inclusive urban design principles and inclusive co-design of public places and strongly recommends the use of CPTED principles. This collaborative approach to urban design principles would support community safety outcomes and the objectives of CoA's Disability, Access and Inclusion Plan.

Designing for climate resilience

The CoA commends the Federal Government's recognition that climate resilience will be an increasingly important aspect of creating safe urban areas.

The CoA's [Integrated Climate Strategy 2030](#) identifies that, with all levels of government working to increase housing supply, all new housing developments should consider embodied carbon, sustainability, and sufficiency principles.

The CoA is investing \$5.7 million in 2024/25 for the purpose of Urban Greening to improve canopy cover in the urban realm and to increase greening for the purpose of combatting the urban heat island effect. CoA seeks supports for cities to progress such initiatives noting the significant cost in some instances of planting trees in dense and highly contested urban realms due to subterranean infrastructure.

The CoA encourages the National Urban Policy to go further and identify an action to work with State and local governments to require new developments to consider and build for anticipated local risks resulting from climate change.

OBJECTIVE 4 – OUR URBAN AREAS ARE SUSTAINABLE

Support for modal shift to active travel, public transport and electric vehicles

The CoA's [Integrated Climate Strategy 2030](#) highlights the importance of investing in safer streets, so more people can choose to walk/wheel and cycle, rather than drive. CoA has set ambitious targets for mode shift from driving to active travel but implementation depends on greater levels of funding from State and Federal Governments for cycling and walking/wheeling. While electrification of vehicles may be part of the decarbonisation picture, for the least carbon footprint and most efficient and beneficial outcomes in our cities, it is vital that there is greater investment in transport infrastructure that supports people to use active travel and public transport.

The CoA encourages the National Urban Policy to develop visions for mode shift to implementation pathways and commitment at all levels of Government to focus on active and public transport, including investment pathways.

Support for electrification of buildings

Electrification is one of the key priorities of the CoA's [Integrated Climate Strategy 2030](#), with an ambition that all homes and businesses will be electrified and powered by renewables. Promoting 'all electric' buildings benefits indoor air quality and reduces costs for residents, in addition to the benefits to our environment. The CoA Strategy seeks public electric vehicle charging infrastructure to be available for all users, including micro-mobility, catalysing the uptake of EVs in Adelaide.

The draft National Urban Policy recognises that electric vehicles are a way of significantly lowering emissions and improving air quality. It is important that the Policy also recognises the even greater benefit from reducing levels of driving (EV car or otherwise) and the same for buildings, given the rapid rate of decarbonisation of our electricity grids.

The CoA strongly encourages the Federal Government to promote the electrification of buildings, in addition to the current focus on improving energy performance of homes and buildings, and improving energy efficiency standards and energy performance ratings, which are also valuable priorities.

Promoting circular economy principles

The CoA supports the inclusion of circular economy principles in the draft Policy. The [City of Adelaide Strategic Plan 2024 -2028](#) supports new ways to reuse vacant or underutilised buildings to retain embodied carbon and improve energy efficiency through retrofitting.

The CoA encourages the National Urban Policy to go further in emphasising the importance of refurbishment and re-use of buildings over demolition and new construction. The Federal Government should encourage all cities and suburbs to adopt circular economy principles, requiring development to consider what can be done with existing structures and materials prior to demolition, promoting adaptive reuse over wholesale demolition and re-build.

Role of car parking policy and investment in mode shift

Car parking policy intersects with other urban policy objectives, including climate change, residential growth, access and inclusion, and mode shift to less intensive carbon travel. The ability to reform car parking policy is inextricably linked to policy for land use and transport planning, with the latter a significant precursor to effective reform. In contested urban environments, space has traditionally been generously allocated to road networks and, consequently, to car parking. The Urban Policy represents an opportunity to reframe existing space priorities to greening and active travel opportunities.

The CoA encourages the National Urban Policy to take an integrated approach to land use and transport planning that recognises the established car dominance of cities can be balanced by investment in public transport, and travel mode shift, that will ultimately support car parking policy reform by local and State governments.

OBJECTIVE 5 – OUR URBAN ENVIRONMENTS AND COMMUNITIES PROMOTE HEALTH AND WELLBEING

Shifting from a human centred approach to a healthy Country approach

The CoA has worked in partnership with the Government of South Australia to develop a [draft Adelaide Park Lands Management Strategy – Towards 2036](#) which seeks to incorporate traditional Aboriginal practices into the planning and management of the Adelaide Park Lands and increase biodiversity outcomes for the city.

Shifting thinking from a human centred approach to a healthy Country approach can lead to urban areas being designed for wellbeing and create places that put sustainability first and help species thrive together.

Healthy Country describes healthy, interconnected natural ecosystems, supported by regenerative practices based on Aboriginal knowledge.

Respecting Aboriginal people's rights as Native Title holders, and their relationships as well as taking a Caring for Country lens to planning and managing urban development, benefits community health and wellbeing, education, cultural knowledge protection, and ecological resilience.

The forced separation of Aboriginal and Torres Strait Islander peoples from their traditional lands, as well as European colonisation, has drastically altered the landscape, including:

- Significant land and vegetation clearing
- Introduction of non-native flora and fauna
- Alternate land management practices.

However urban areas can be rich in biodiversity if urban policy allows for it, recognising the importance of Aboriginal and Torres Strait Islander people's rights, knowledge and living cultures to help in re-establishing a healthy Country through practices such as cultural burning, revegetation and continued monitoring of our biodiversity.

Including Aboriginal and Torres Strait Islander people's perspectives in the design of blue and green spaces increases cultural visibility and awareness in urban areas. If these practices are embedded into the National Urban Policy for urban planning and design, we can achieve regenerative futures.

A strong connection to nature has significant health benefits, including improved mental well-being, reduced stress, and enhanced physical health. By promoting nature connectedness in urban areas, we can cultivate communities that value and protect the city's biodiversity while also reaping the therapeutic benefits of a closer relationship with the natural world.

Further consideration in the National Urban Policy should be given to adopting regenerative practices in urban environments to help create places that foster prosperous futures for all life.

Greater recognition and support to improve existing, and deliver new, quality public open spaces

A key urban challenge for the future of our cities is access to quality public open spaces. Further consideration should be given to urban policy that fosters community open spaces that are accessible, usable and protected.

Through the draft City Plan – Adelaide 2036, the CoA advocates for existing open spaces to be protected and enhanced to ensure that as our climate changes and urban areas densify, communities have access to cool, green and natural environments.

Through the National Urban Policy, the Federal Government should encourage a net increase in open spaces and ensure that there is adequate funding available from all tiers of government to purchase additional open spaces and enhance the existing networks.

Support to improve active transport and social infrastructure

As identified in the draft National Urban Policy, urban health and liveability are intertwined with our transport network, namely the provision of safe and convenient active travel and public transport. The cost of non-communicable diseases is a huge burden on our health budgets but many are preventable if more people do incidental exercise through active travel and public transport use.

Through the development of an Integrated Transport Strategy, the City of Adelaide is seeking to implement a framework incorporating a Movement and Place, Healthy Streets and Safe System approach. This is an evidence-based framework for transport network planning, project pipeline development and options assessments, as well as communicating with the community and stakeholders.

As noted in the draft Policy, higher levels of active travel are dependent on facilities and crossings that are safe and comfortable for all ages and abilities. The pathway to creating healthier streets that support people to use active travel (and better urban places) needs to be elaborated on.

The CoA encourages the National Urban Policy to include further detail about implementation and investment by Federal Government in active and public transport networks.

OBJECTIVE 6 – OUR URBAN AREAS PROMOTE PRODUCTIVITY

Prioritise infill development

The CoA supports the focus on ensuring that people, goods and ideas are as connected as possible, driving economically productive cities and suburbs. CoA's Housing Strategy advocates for well-located, diverse housing choices within the city.

CoA's draft City Plan – Adelaide 2036 seeks to sustainably grow the city's residential population while protecting existing priority economic clusters such as the Biomedical Precinct and Lot Fourteen Innovation Precinct.

The National Urban Policy should prioritise infill development. Sustainable residential growth in the City of Adelaide will reinforce the primacy of the city and its role in the Greater Adelaide region.

Support for additional public transport infrastructure

CoA's [draft Economic Development Strategy 2024-2028](#) advocates for additional public transport infrastructure that supports access to businesses and precincts. Large scale public transportation projects for travel into and around the CoA requires support from all levels of government.

The CoA encourages the National Urban Policy to strengthen its corresponding actions to explore funding options to increase the role of public transport in urban commuting.

Urban freight and land use planning

The City of Adelaide welcomes the draft Policy's statement about the improved integration of freight and land use planning. In addition, it is also important for efficiency, decarbonisation and safety outcomes that rail freight is expanded.

The CoA encourages the National Urban Policy to strengthen its corresponding actions to reduce the car dependence of city centres and invest in movement networks for people and goods that include strong public and active transport systems.