

3 July 2024

The Hon Catherine King MP
Minister for Infrastructure, Transport, Regional Development and Local Government
C/- Department of Infrastructure, Transport,
Regional Development, Communications and the Arts

Via email: urbanpolicyinput@infrastructure.gov.au

Dear Minister King

FEEDBACK ON DRAFT NATIONAL URBAN POLICY

We appreciate the opportunity to consider and comment on the consultation draft of the “National Urban Policy” (the Draft Policy) and look forward to working collaboratively with all levels of government to deliver sustainable growth in the City of Burnside.

1. City of Burnside – Context

The City of Burnside is one of South Australia’s oldest established, inner city, local government areas, located between the Adelaide Hills to the east and the City of Adelaide to the west.

Key features of our population include:

- 2023 estimated resident population: 47,444
- one of the lowest levels of relative socio-economic disadvantage in South Australia according to the SEIFA index (1083), and
- a higher proportion of over 60-year olds, and a relatively higher level of education than the Greater Adelaide Region.

2. Recognition of the role of Local Government

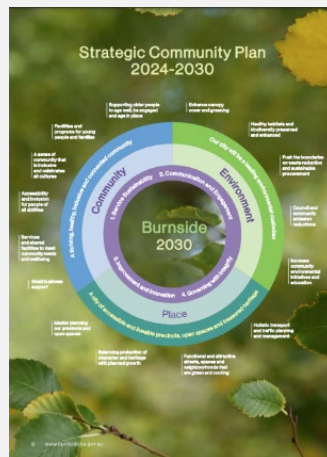
It is understood that the Federal Government is seeking to enable urban areas to be liveable, equitable, productive, sustainable and resilient. We appreciate the importance of the Draft Policy to encouraging alignment and establishment of partnerships between, across and with all levels of government. However, the Draft National Urban Policy should ideally provide greater recognition to the existing and important ongoing role of local government and local communities in shaping and planning cities and suburbs.

3. City of Burnside Vision and Strategic Community Plan (Burnside 2030)

The proposed National Urban Policy is generally consistent with City of Burnside's endorsed Strategic Community Plan 2024-2030, which includes the following vision:

"A prosperous City with a healthy, safe, connected and active community, living in green leafy neighbourhoods where lifestyle is admired, heritage is valued and people and nature live in harmony."

Burnside 2030 (linked below), outlines Council's principles, key themes, goals and priorities in the delivery of Council services and projects that are responsive to community desires and needs.



<https://www.burnside.sa.gov.au/About-Council/Policies-Plans-Reports/Strategies/Burnside-2030-Strategic-Community-Plan>

The proposed National Urban Policy has synergies with the City of Burnside Community, Environment and Place goals, which shapes our annual budget and delivery, and 10-year Long Term Financial Plan, as outlined below:

Community - Goal 1 "A thriving, healthy, inclusive and connected community"

- Priority 1.1 Supporting older people to age well, be engaged and age in place
- Priority 1.2 Facilities and programs for young people and families
- Priority 1.3 A sense of community that is inclusive and celebrates all cultures
- Priority 1.4 Accessibility and inclusion for people of all abilities
- Priority 1.5 Services and shared facilities to meet community needs and wellbeing
- Priority 1.6 Small business support

Environment - Goal 2 “Our city will be a leading environmental custodian”

- Priority 2.1 Enhance canopy cover and greening
- Priority 2.2 Healthy habitats and biodiversity preserved and enhanced
- Priority 2.3 Push the boundaries on waste reduction and sustainable procurement
- Priority 2.4 Council and community emission reductions
- Priority 2.5 Increase community environmental initiatives and education

Place - Goal 3 “A City of accessible and liveable precincts, open spaces and treasured heritage”

- Priority 3.1 Master-planning our precincts and open spaces
- Priority 3.2 Balancing protection of character and heritage with planned growth
- Priority 3.3 Functional and attractive streets, spaces and neighbourhoods that are green and cooling
- Priority 3.4 Holistic transport and traffic planning and management

Federal-level coordination and collaboration will assist the City of Burnside to deliver this vision for our community.

4. Investment in Cities and Suburbs

The National Urban Policy is an excellent opportunity to highlight new opportunities for collaboration and to maximise shared investment in our futures. We recognise the 2023-2024 Federal budget committed to:

- \$11.9 million to establish a new Cities and Suburbs Unit
- \$150 million for an Urban Precincts and Partnerships Project, and
- \$200 Million for a Thriving Suburbs Program

Retrofitting inner city suburbs to enable sustainable growth and enabling walkable communities, whilst also absorbing regional transportation pressures, is expensive and complex especially within older, established communities such as the City of Burnside.

5. Funding Opportunities

As stated above, with increasing demands on Council resources and infrastructure, opportunities for Federal and State funding to enable local government to meaningfully contribute to the achievement of the urban policy objectives will be critical to their success.

6. Response to Draft National Urban Policy – Objectives and Principles

The Objectives and Principles of the Draft National Urban Policy are generally consistent with the City of Burnside Strategic Community plan, and also Council's endorsed City Master Plan (Urban Form and Transport):

<https://www.burnside.sa.gov.au/files/assets/public/v/2/about-council/policies-plans-amp-reports/strategies/city-master-plan/cob-master-plan-august-2022-v2-pages.pdf>

The following more specific comments on the draft Objectives are also provided for your consideration:

1. No-one and no place left behind:

The importance of providing equitable and diverse housing options for all is acknowledged. The continued maintenance, upgrade and replacement of existing social housing should form a key component of this process.

2. All people belong and are welcome:

As a local government area with a high percentage of older residents, the provision of age-appropriate facilities and access to social opportunities is particularly important.

It is also pleasing to see that positive heritage outcomes are identified as contributing to the wellbeing and liveability of urban areas and national guidance for the funding of priorities related to such heritage is listed as a possible action.

3. Our urban areas are safe:

As an inner suburban local government area adjacent the Adelaide Hills we must also manage bushfire and flood risk. As such climate resilience is a constant and increasing priority and the resourcing of such management an ongoing concern.

4. Our urban areas are sustainable:

This objective is consistent with Council's own Master Plan which highlights the critical relationship between urban form, land use, activation, tree canopy, and the transport system. Continued investment by the State Government in a zero emissions bus fleet

and cross council bus services and the provision of more direct services to key destinations such as the CBD.

5. Our urban environments and communities promote health and well-being:

This objective is consistent with both Council's Strategic and City Master Plan. It references high quality housing as being critical to promoting liveability, productivity and good community health. This is consistent with Council's Strategic Plan which promotes functional and attractive streets, spaces and neighbourhoods that are green and cooling. Whilst sustainable building materials and construction methods is a key component of this, the positive impact of simple measures such as requiring eaves on all dwellings and greater emphasis on building orientation should not be underestimated. The term 'green and blue' spaces could be defined and/or replaced with terms which are easily understood by most readers.

6. Our urban areas promote productivity:

The City of Burnside houses two strategically significant heavy vehicle freight routes which are in close proximity to established residential areas. Council's City Master Plan highlights the need to work with the State Government in the planning and design of future infrastructure to manage heavy freight vehicles. As such, Council is currently seeking the reinstatement of Federal funding for the Greater Adelaide Freight Bypass (GAFB).

The City of Burnside is in favour of a reduction in the volume of heavy vehicles on Portrush and Glen Osmond Roads via the GAFB, which will have a range of benefits including an increase in freight productivity, a reduction in damage and injuries as a result of traffic collisions, improved traffic flow, a reduction in noise and pollution and much more.

Adelaide is the only capital city in Australia where the National Heavy Vehicle Regulator's heavy vehicle network, the major arterial route, runs through the residential suburbs of a city - past schools, preschools, residential homes, aged care homes and churches, all places where children and vulnerable residents are present.

National Freight Data Hub statistics from 2018 reveal that an average of 2,404 heavy vehicles travel on Portrush Road and Glen Osmond Road each day, while 273 people have lost their lives or were seriously injured as a result of a road crash on Portrush Road, Glen Osmond Road and the South Eastern Freeway within the City of Burnside boundary.

The following link provides a fact sheet on this matter:

<https://www.burnside.sa.gov.au/files/assets/public/v/1/community-amp-recreation/community-engagement/latest-news/cob-gafb-brief-2024-v4.pdf>

The following comments on the draft Principles are also provided for your consideration:

1. City planning and governance must be collaborative and adaptive:

As part of this Principle, reference is made to the development of a nationally consistent definition for urban density to help identify the appropriate built form and structural density for urban areas. Any such measure should be developed in close consultation with relevant local and state authorities to ensure that definitions are meaningful and appropriate to a particular jurisdiction and size and scale of an urban area.

2. Purposeful place making increases wellbeing and connection:

Council's strategic planning documents reference the need for liveable precincts and opportunities for social connectivity. Further recognition could be given to the holistic provision of housing for the intergenerational needs of our community and support for older people to age well, be engaged and age in place. The importance of protecting character and heritage should not be underestimated as each contributes to the formation of community identity and ensures that important connections to our past are not lost.

3. Urban development should actively improve social, environmental and economic outcomes:

Urban growth and development should not be at the expense of the retention of the existing, established urban tree canopy and maintenance of local healthy habitats and biodiversity. These elements are crucial to achieving sustainable development and improved liveability for our communities. Boundaries should be pushed on waste reduction and sustainable procurement.

4. Improving the evidence base will underpin urban innovation:

Council's Strategic Plan is consistent with this priority. Further emphasis could be included to reference governing with integrity and the need to foster a culture of risk-aware decision making.

5. Fair and inclusive development builds equitable communities:

Opportunities should continue to be provided for existing and proposed communities to be involved in decisions which affect their neighbourhood, particularly in relation to urban form and infrastructure.

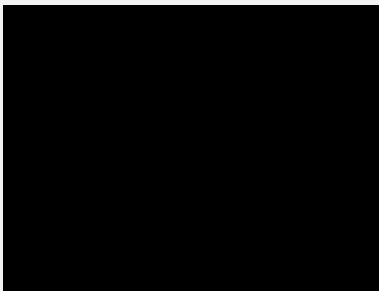
6. Fostering innovation and creativity hubs enhance diversity and broadens opportunities:

Council's strategic plan highlights the need to provide programs and opportunities for our community to learn, connect and pursue recreational, cultural, and sporting passions. Further emphasis could be detailed in the National Urban Policy to address the need for flexible and quality multipurpose spaces and facilities and the investigation of opportunities to co-locate government services.

We look forward to working together with all levels of government and our local community to ensure implementation of a finalised National Urban Policy provides a positive contribution to the City of Burnside, consistent with our Council's strategic goals.

Should you have any questions or wish to discuss the matters raised, please do not hesitate to contact Aaron Schroeder, Policy and Projects Manager, aschroeder@burnside.sa.gov.au or (08) 8366 4200 or Alison Cusack RPIA, Coordinator City Policy & Planning, acusack@burnside.sa.gov.au (08) 8366 4200.

Yours sincerely



Barry Cant

Director, Environment and Place