



Submission to the

Greater Adelaide Regional Plan

November 2024



RAA at a glance



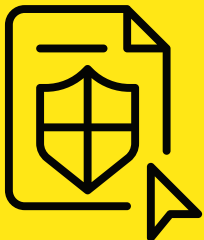
South Australia's largest
member-owned
organisation



Advocating for South
Australians for
123 years



823k+
current members
(67% of SA adults)



630k+
South Australian homes
and cars insured



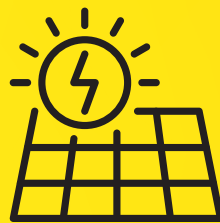
1,200+
staff employed
across SA



344k+
roadside rescues
per year



60,000+
uses of the MyRAA app
fuel feature per month



14,000+
solar panels installed
per year



40,000+
Holidays booked
per year



33,000+
school students
educated on
road safety each year



9,500+
child restraints
fitted or checked
each year



\$874k+
per year invested
in community grants
and sponsorships



Introduction

RAA welcomes the release of the Greater Adelaide Regional Plan (the Plan) as a pivotal framework that will shape the future of South Australia’s metropolitan region. We believe the Plan is a strong step in the right direction for accommodating future growth in a sustainable way.

With the population of Greater Adelaide projected to grow by 46% (an additional 670,000 people) by 2051, RAA believes that long-term, strategic planning is paramount to ensuring our success and standard of living. This Plan plays a vital role in fostering sustainable housing, integrated transport and essential services, and ensuring South Australia remains a vibrant place to live, work and thrive.

As South Australia’s largest member organisation representing more than 820,000 members and connecting with over 70 per cent of households, RAA exists to make life easier for our members and the community.

For more than 120 years, we have advocated for South Australians by championing road safety, improved mobility and essential services. Today, our organisation spans across motor, home, travel and energy sectors, uniquely positioning us to engage with the Government on implementing the Plan’s vision.

RAA supports a South Australia that is safe, sustainable and liveable. We support a high-growth outlook, recognising the need for strategies that accommodate rapid development of our state, while enhancing the quality of life for South Australians.



 RAA

Summary of key recommendations

In our submission, we provide detailed responses to key themes and questions raised in the Plan.

Our responses and recommendations support:

- 1.** Planning for high-growth scenarios to ensure the state is future-ready.

- 2.** Applying a targeted approach to infill housing development and maximising opportunities for higher-density growth near existing transit corridors and public transport infrastructure to reduce car dependency.

- 3.** Better integrating transport infrastructure and developing a public transport plan for all new developments, prioritising rail connectivity in key greenfield growth areas to alleviate road congestion.

- 4.** Implementing flexible infrastructure funding mechanisms (deeds, schemes) tailored to local needs to reduce lag in delivering key infrastructure projects and addressing the ‘middle infrastructure’.

- 5.** Smooth transition to sustainable living through home electrification, energy-efficient upgrades, and accessible EV charging infrastructure, including bidirectional and kerbside charging to enhance grid resilience and emissions.

- 6.** Improved disaster resilience measures in land-use planning, focusing on flood risk and climate change.

- 7.** Immediate investment in public transport for existing developments and better integration of cycling paths, addressing current gaps.

- 8.** Reversing the decision to delay implementation of National Construction Code updates for 10 years, promoting sustainable building standards sooner.

- 9.** Action to realise the ‘living locally’ concept in greenfield developments and existing communities and develop a jobs strategy to support employment land zoning.

- 10.** Balanced funding strategies that support timely infrastructure delivery while mitigating cost-of-living pressures for South Australians.

What does RAA support?



Population Growth Scenarios

RAA supports the decision to adopt a high-growth scenario to anticipate and plan for growth across the Greater Adelaide region.

We believe strong population growth will spur economic activity and create more opportunities for young people. However, as our state grows towards two million people over the next decade, we also need to maintain its unique liveability.

In early 2023, RAA surveyed members to understand their views on population growth. While many opposed population growth, the main issue was infrastructure not keeping pace. If we peel back the layers, very few people have an issue with an increasing birth rate or attracting people to move to SA. Their concern arises if that growth compromises their quality of life – whether that be through more congested roads, greater demand on services, and more competition for jobs.

We therefore commend the Plan’s ambition and forward thinking that acknowledges the challenges and opportunities this growth presents, ensuring South Australia remains a vibrant place to live, work and travel.

Better Planned Communities

RAA believes the Plan provides the right mix of housing options to address housing supply shortages in Greater Adelaide and meet future demand. We support regional centres like Murray Bridge and the northern suburbs of Adelaide being identified as key greenfield growth areas, and the focus on several strategic infill development opportunities.

The shift from general infill to a focus on strategic infill will allow for better planning and more efficient use of infrastructure spending. By focusing on specific areas for higher-density housing, the Plan ensures that developments are better aligned with existing services and transport links, reducing strain on already congested suburban infrastructure.

This focus is particularly commendable, as it encourages more sustainable, high-density housing along key transport corridors, enhancing accessibility and reducing reliance on cars. This approach not only supports Adelaide’s growing population but also promotes a more integrated and liveable urban environment.

Better Connected Communities

The Plan represents an opportunity to better plan and develop key public infrastructure in parallel with housing developments. For too long, Adelaide’s existing transport network has suffered from insufficient planning, leading to congestion and inefficiencies.

RAA supports the many statements made in the Plan about better integrating land use planning with transport infrastructure and other essential services. We also support the focus on public transport.

RAA believes public transport should be a consideration at the beginning of the investigation and planning stage for any future housing developments. In fact, we believe the Plan should recommend public transport strategies are created for all new developments.

What is critical now is that these positive statements about infrastructure coordination in the Plan are turned into action. RAA supports the development of a Transport Strategy, Public Transport Strategy, and Open Space Strategy, as proposed in the Plan, to consider the provision of infrastructure in more detail and ensure new developments are accessible and sustainable.

We look forward to engaging with the Government on these upcoming strategies. We will recommend the Government consider several projects to support population growth, including:

- The provision of new public transport rail connections to new and future developments in the north, including Riverlea, Dry Creek, Concordia and Roseworthy, and Aldinga in the south. Extending the Seaford rail line to Aldinga would support growth in the immediate area but also provide a more accessible rail option for people across the Fleurieu Peninsula, including Victor Harbor.
- Improved public transport to the Adelaide Hills and further exploration of a passenger rail service between Adelaide and Murray Bridge in the long term that competes with the car for travel time and cost.
- A third lane on the South Eastern Freeway to Verdun interchange to reduce traffic congestion and support population growth in the Adelaide Hills and a third safety ramp at the end of the freeway to improve safety.
- Upgrading east-west links in Adelaide’s north, including Curtis Road, Waterloo Corner Road, Kings Road and Elder Smith Road, following increases in housing developments in the area.
- The feasibility and benefits of extending the tram network to high density areas. RAA recognises there may not be a role for trams beyond the existing network, given their very high installation cost per kilometre and

the consequent occupancy of existing road corridor in an existing environment. However, trams should be considered as a transport option in high-density areas. Emerging technologies such as trackless trams, for example, could provide the benefits of conventional trams without the need for expensive fixed route infrastructure.

- Park and ride facilities at the outskirts of longer rail journeys. Ideally, active transport options should be used to travel between homes and the rail network.

Freight and Supply Chain Networks

RAA supports the principle of intermodal freight and supply chain movement to reduce reliance on sole transport modes and capitalise on the respective strengths of differing transport modes, depending on the task, distance and value.

We envisage that there would be an expanded role for rail to provide mode resilience and reduce the dependence of road transport. The role of local government is critical, given that many of the first and last mile journeys involve the use of local government-maintained infrastructure where there may be competing demands for the allocation of space within the corridor.

Councils must therefore be part of any freight and supply chain corridor Planning and development from the outset.

Infrastructure Funding Mechanisms

RAA strongly welcomes the consideration of various infrastructure funding mechanisms and supports the Plan’s strategy to “evaluate the most effective and fit-for-purpose infrastructure funding mechanism for projects such as deeds, infrastructure schemes and fixed charges”.

RAA believes that existing funding arrangements have failed to deliver the right infrastructure at the right time for South Australians. They have enabled blame shifting, have a lack of accountability and provide little transparency.

We want to see better coordination and planning of infrastructure, based on needs. The system should be flexible, appropriate for the area, and this may mean that infrastructure schemes are the best approach for some developments, while deeds are best in others.

Overall, RAA believes that funding mechanisms to build the required infrastructure for new developments must be clear in terms of responsibility and transparent in terms of where funding is spent.

While funding agreements between government and developers generally focus on critical infrastructure, RAA also supports an approach that provides greater consideration to the impact on middle infrastructure. For example, new developments in outer areas that impact on inner roads and services.

Consideration for Future Mobility

RAA supports the Plan’s focus on electric vehicles (EVs), including accessible charging infrastructure. However, we believe that the decision by the State Government to delay adopting any changes to the National Construction Code for another 10 years could impact EV uptake, considering that 2025 changes will better accommodate EV charging in new homes. We discuss this issue in more detail later in this document.

The Plan importantly acknowledges the opportunities for other emerging technologies to reduce parking demand and car dependency at strategic infill locations. Specifically, we support the inclusion of car sharing arrangements and micromobility.

Focus on Disaster Resilience

RAA fully supports the Plan’s focus on disaster resilience, including Climate Change Strategy 1: *“Consider the impacts of climate change on communities and locations and identify potential risk mitigation measures when determining appropriate locations for future growth areas.”*

The increase in natural disasters has highlighted the need to reduce risk by investing in disaster mitigation measures and more consciously consider the relationship between land use Planning and extreme weather risk.

The benefits of investing in disaster mitigation measures are highlighted by research commissioned by the Insurance Council of Australia, which found that a five-year program of resilience measures costing approximately \$2 billion could reduce costs to governments and households by more than \$19 billion by 2050 — a nearly tenfold return on investment.

RAA supports the Plan’s focus on ensuring that the planning system includes updated flood hazard overlays in the Code, which address the risks of floods by guiding development siting and other relevant policies. We look forward to collaborating with the Government to encourage greater disaster resilience, with the aim of providing affordable insurance to greenfield developments.

Local Transport Networks

RAA believes local networks are essential to reducing the reliance on private vehicles and are key components of master planning for new developments, such as the former West End Brewery site.

We encourage the integration of lower speed limits and active transport infrastructure within new developments. Emerging mobility solutions such as car sharing and micromobility should complement ‘living locally’ principles, reducing parking demand and supporting sustainable urban design.

RAA Senior Traffic Engineer Matt Vertudaches and RAA Traffic Engineer Paul Leone.



What can the Plan do better?



Urgent Investment in Transport Infrastructure

While we appreciate the Plan is focused on growth over the long term, it must clearly acknowledge that many existing growth areas (notably to Adelaide’s north and in the Adelaide Hills) are not supported by efficient public transport options, safe cycling routes, and many key roads are plagued by traffic congestion.

RAA believes the Government needs to accelerate infrastructure solutions for existing developments, while also planning for further growth. Current issues are a result of poor planning and a lack of commitment to build the infrastructure needed in parallel with building homes – problems that the Plan aims to address.

We note that specific transport infrastructure investments will be explored in upcoming transport strategies, and adjacent public transport strategies. However, there is a clear need for the Plan to identify current issues, such as:

- Congestion on east-west road links in the northern suburbs, such as Curtis Road, Waterloo Corner Road, Kings Road and Elder Smith Road.
- The lack of planning for public transport to the new Riverlea development.
- Growing congestion on the South Eastern Freeway as a result of population growth in the Adelaide Hills.

Passenger Rail between Adelaide and Murray Bridge

RAA supports the identification of Murray Bridge as a potential satellite city. However, the Plan should clearly explore how this will increase congestion on the South Eastern Freeway without an alternative to car travel between Murray Bridge and inner Adelaide in the long term.

Over the years, the Government has considered several options to extend passenger rail to the Adelaide Hills, Mount Barker and beyond. However, none of these options have presented a strong business case, resulting in a long period of inaction.

We expect that the current \$10 million study will provide some options for expanding passenger rail to Mount Barker and beyond. Cost effective options could include a dual-purpose passenger and freight line, re-aligning and using existing standard gauge line, and optimising the route to avoid expensive tunnelling. Further benefits may be unlocked by strategically locating stations to service other population centres like Strathalbyn, Goolwa and Victor Harbour

Challenges to ‘Living Locally’

RAA believes the Plan is contradictory in its proposal to implement a ‘living locally’ concept. This is because the Plan admits that ‘living locally’ is unlikely to be realised at greenfield developments, and unlikely to be retrofitted to existing neighbourhoods, but does not identify solutions or strategies to address these limitations.

Furthermore, while the Plan is cognisant of providing local employment opportunities and identifies the need to preserve land for industry growth, it does not offer insight into growth industries and occupations that will drive job creation. Without an understanding of what jobs will be available – it is very difficult to Plan for people to ‘live locally’.

RAA believes the Government should support the Plan through a jobs strategy that details jobs growth potential, with consideration for the economic landscape and changing industries. This could then guide employment land zoning decisions.

While RAA supports the aim of providing local employment opportunities at greenfield developments, the most effective approach to reducing car dependence is a frequent and reliable public transport service that connects users with key employment and education hubs.

RAA believes the Plan should recommend that public transport strategies are developed for each new greenfield development.

Regarding retrofitting living locally features at general infill sites, RAA believes the Government should actively work with the community to consider zoning changes to facilitate greater mixed-use services. Other options could include non-infrastructure improvements to public transport, including increasing frequency and optimised route design for bus services.

Construction Code Amendments and Climate Resilient Housing

The Plan rightly calls for climate resilient housing and acknowledges the need to accommodate emerging technologies such as EVs. However, the Plan has not said anything about how the SA Government’s decision to delay any further changes to the National Construction Code (NCC) for 10 years will impact this goal.

The NCC 2022 amendments came into force in South Australia in October 2024. These changes introduced greater energy efficiency and accessibility standards

for homes, as well as new standards to ensure apartment buildings can accommodate EV charging.

In announcing the implementation of the NCC 2022 amendments, the SA Government announced that it will not implement any further changes to the NCC in South Australia for 10 years.¹ This will mean that South Australia will not adopt changes proposed for the next update of the NCC – including:

- Requiring more switchboard capacity for a new house to accommodate EVs.
- Requiring infrastructure to support faster domestic charging of an EV in the garage (or carport, etc.) of a new house.

In addition, the Government’s decision will mean that climate resilient changes will not be built in SA, including:

- More stringent structural provisions for houses, to withstand cyclonic winds in some regions.
- Greater waterproofing and water shedding requirements for apartment buildings.

It appears that many future proposed amendments to the NCC align with the Plan’s goals. As such, RAA believes the Plan should recommend that the SA Government reconsider their decision to halt changes for 10 years.

Integration of cycling paths into green spaces

RAA commends the Plan’s aim to increase Adelaide’s tree canopy cover from 17% to 30% by 2051. Introduction of the Greater Adelaide Open Spaces concept, incorporating new parks, urban forests, and coastal reserves, is an excellent inclusion in the Plan. We note that with increased housing density and the move to larger houses on smaller blocks, greening will have to take place largely on public land and streets to build up the canopy.

While the Plan acknowledges that open spaces may provide greater cycling and walking amenities, we believe that connected off-road cycle paths should be a fundamental feature of open spaces.

RAA believes the Plan should amend its long-term objectives for open spaces and include integrating cycle paths as an objective in its own right. Increasing active transport will be a crucial part of achieving the ‘living locally’ vision. RAA cycling research has shown that Adelaide residents prefer safe off-road cycle paths and that many are “interested but cautious” about adopting cycling as a mode of transport.²



[1. National Construction Code certainty | SA Planning Commission](#)

[2. Risky Rides – Advocating for safe roads and paths for cyclists | RAA](#)

Concerns about funding the Plan

While the Plan presents an ambitious vision for the future of Adelaide, we urge the Government to consider how public infrastructure will be funded, particularly in the context of a cost-of-living crisis that has seen South Australians paying more for essentials, such as electricity and groceries.

Accommodating an additional 670,000 people in Greater Adelaide will require significant investment in the transport system, including roads, public transport and active transport infrastructure.

However, one of the main sources of road-related revenue – fuel excise – is set to shrink as more EVs and fuel-efficient vehicles replace older less efficient models. Over time, this means those that can only afford to drive older less fuel-efficient cars are left paying fuel excise.

In recent years, various state and territory governments have introduced state-based charges on EVs. However, in October 2023, the High Court of Australia found that an EV charge in Victoria was invalid on the basis that it imposes a duty of excise within the meaning of s 90 of the Constitution.

With this decision, the Australian Government must work with states and territories to develop a nationally consistent approach. This should also provide an opportunity to address the inequity in the fuel excise system.

RAA supports replacing fuel excise with a nationally consistent distance-based charge on all light vehicles, regardless of the type of car they drive, to ensure there is a sustainable revenue model to fund transport infrastructure and maintain safe roads into the future.

This would ensure that:

- Transport infrastructure funding is not reliant on fuel excise revenue which is declining with the adoption of low emission and electric vehicles.
- There is a fairer, equitable, and transparent funding system.
- The charge is not considered or misunderstood as a tax just on EVs.
- All motorists regardless of vehicle contribute towards the cost of building and maintaining a safe and efficient transport network.

The application of a distance-based charge should be introduced in way that does not disincentivise adoption of EVs. For example, a lower rate and/or incentives could be applied to EVs to compensate for the charge. All revenue from the charge should be directed exclusively to land transport and electric vehicle infrastructure.

No mention of road safety

The Plan is missing any mention of road safety and does not mention the state or national road safety strategies. Many of the key transport/road elements of the Plan should be considerate of state and national road safety strategies and action Plans to ensure that the targets can be met. Specifically – if aiming for zero lives lost by 2050, the impact of urban development on the metro fringe area on the safety of the road network should be considered.



Conclusion

RAA looks forward to continuing its collaboration with the Government to ensure that Adelaide's growth is both sustainable and forward-thinking. With the right planning and investment in infrastructure, we believe that Greater Adelaide can meet the challenges of population growth while enhancing its liveability and resilience.



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