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Submission to the **Greater Adelaide Regional Plan**

November 2023

Motor | Home | Travel



RAA at a glance



South Australia's largest
member-owned
organisation



Advocating for South
Australians for
120 years



805k+
current members
(60% of SA adults)



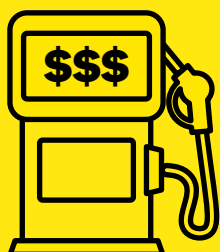
630k+
South Australian homes
and cars insured



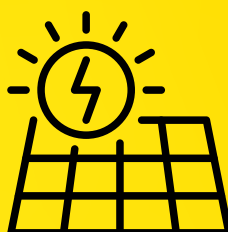
1,200+
staff employed
across SA



344k+
roadside rescues
per year



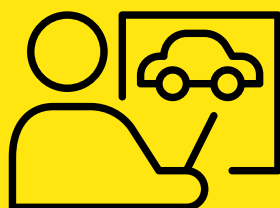
60,000+
uses of the MyRAA app
fuel feature per month



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

Foreword

RAA welcomes the opportunity to make a submission to the Greater Adelaide Regional Plan Discussion Paper.



As the state's largest member organisation representing over 805,000 South Australians and reaching into more than 70 per cent of households, we exist to make life easier for our members and the community.

For 120 years, RAA has been advocating on behalf of our members to help South Australians stay safe on our roads and travel around our great state. Today, our core business cuts across motor, home, travel, and energy, which puts RAA in a unique position to engage with the SA Government on the development of the GARP.

RAA supports a bigger, better South Australia that is safe, sustainable, and liveable. 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.

Population growth will only support liveability when the infrastructure is developed in parallel. Housing developments, both greenfield and urban infill, must be supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibility and transparency for action.

Furthermore, the increase of natural disasters in recent years has highlighted the need to invest in disaster mitigation measures and more consciously consider the relationship between land use planning and extreme weather risk. As South Australia's leading personal lines insurer, RAA is committed to working with industry and governments to reduce the risk of natural disasters. Reducing risk will improve insurance affordability and avoid future financial costs to homeowners, businesses, governments, and communities.

The transition to electric vehicles will help decarbonise personal transport and change the way we fuel our vehicles and power our homes. The convergence of the home and car presents enormous opportunities and the GARP needs to be considerate of the additional energy demand and need for smart home infrastructure that will be required to support this transition.

In the following submission we address the key areas and questions posed in the Discussion Paper relevant to RAA members. In particular, we focus on what the GARP can do to ease cost of living through increased housing supply, reducing home energy bills, improving insurance affordability and lowering transport costs.

We also provide advice on what is needed for our road network, future mobility trends, electric vehicle uptake, and public and active transport infrastructure.

On behalf of our members, we thank you for the opportunity to provide a submission to the Discussion Paper.

RAA is buoyed by the Government's renewed approach to this important planning task. We are supportive of the Government's intention to plan for a high growth scenario and look forward to ongoing engagement as the GARP is developed and implemented.

Emily Perry

General Manager,
RAA Community and Corporate Affairs



How should Adelaide grow?

Outcomes for Greater Adelaide

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

RAA supports the four outcomes identified in the Discussion Paper to guide the discussion about how Greater Adelaide should grow ('greener', 'equitable', 'strong economy', and 'choice of housing').

However, RAA believes the Government should consider aligning the outcomes of the GARP to the United Nations Sustainable Development Goals including those under SDG 11: 'Make cities and human settlements inclusive, safe, resilient and sustainable'. This will enable greater transparency and international benchmarking of

outcomes. For example, goals that align with SDG 11 could include (but not be limited to) measurable and ambitious targets for:

- Proportion of population that has convenient access to public transport, by sex, age and persons with disabilities.
- Ratio of land consumption rate to population growth rate.
- Direct economic loss attributed to disasters in relation to global domestic product (GDP).

Recommendation 1

SA Government align outcomes for how Greater Adelaide should grow to the United Nations Sustainable Development Goals.



Outcomes for Greater Adelaide (continued)

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?

RAA believes changing mobility systems will have a considerable impact on land use in coming years.

Electric vehicles

Electric vehicles are the future here and around the world and RAA believes South Australia should lead the nation in the transition to EVs to capitalise on our abundant supply of renewable energy and reduce motoring costs.

After a slow start, it is clear that Australia is now catching up to the rest of the world when it comes to EV adoption. EV sales have accelerated rapidly, with 3,538 sold in SA throughout 2023 (January to September), which is more than double the amount of EVs sold in all of 2022.¹

The emergence of EVs presents significant opportunities to decarbonise personal transport and RAA is proud to be playing a part in supporting EV adoption by building 140 EV charging sites across the state, with support from a State Government grant.

Notwithstanding the immense opportunities of EV adoption, some challenges are emerging which are relevant to the GARP.

To support public EV charging, ongoing investment in the energy network is required to fill gaps and to increase capacity at high demand locations.

One of the key lessons to date from RAA's experience in installing public charging infrastructure is that parts of the network are not capable of hosting DC rapid and ultra-rapid EV chargers. Some regions, specifically the Limestone Coast and Yorke Peninsula, are particularly challenging. Others such as the Eyre Peninsula are relatively DC charger ready, although this can differ between towns and within sub-regions.

RAA has been advised that the network upgrades required to install DC chargers in some areas are simply not feasible. Network modifications carry very high costs and can take several years to implement. From the network service provider perspective there is no motivation to prioritise these upgrades over other competing priorities.

DC chargers are required to charge EV batteries in the lowest amount of time, addressing the main barriers to EV uptake – range anxiety and extended travel time. Ideally chargers should be built in areas that provide the greatest convenience to drivers; however, RAA believes that without intervention and scaling up, network capacity will limit where they may be located. This will create gaps in the public charging network that may be seen as barrier to EV uptake.

While public charging availability is critical to supporting EV uptake, most EV charging will occur in the home, which will create additional demand for electricity in residential areas.

Greenfield developments and urban infill must be considerate of the need to support home EV charging when determining the need for electricity infrastructure.

RAA believes that preparing new builds for smart EV charging should be a priority. This includes ensuring that buildings are Vehicle to Grid (V2G) and Vehicle to Home (V2H) ready to allow EV owners to export energy from their EV battery to power their home or to sell back to the grid.

In the near future, V2H and V2G technologies will provide flexible and dispatchable storage behind the meter. A September 2023 report by the Australian Energy Market Commission (AEMC) stated: “The Commission expects substantial new investment in EVs will increasingly

1. Federal Chamber of Automotive Industries, VFACTS

Outcomes for Greater Adelaide (continued)

drive two-way and controllable power transfers between individual consumers and the broader power grid.”²

This interaction with the grid creates a need to ensure appropriate industry standards for charging equipment and inverters. The Energy Security Board has recently consulted on this matter, resulting in strong stakeholder support for setting of minimum equipment standards for chargers at a national level, and a strong preference for use of international standards.³

The AEMC is supportive of consistent national technical standards for Consumer Energy Resources (like EV batteries) and have recommended energy ministers lead the development of a national regulatory framework for technical standards.⁴

Recommendation 2

SA Government works with the Australian Government, state/territory governments, industry groups, standards bodies, and equipment manufacturers to establish nationally consistent standards for Vehicle to Home and Vehicle to Grid bi-directional charging.

Energy

Where possible, the GARP should be considerate of opportunities to service a growing population using our existing energy infrastructure, to avoid additional investment where possible.

Through greater uptake of time of use tariffs, there is potential to shift electricity demand to off-peak periods, therefore easing the need to build more poles, wires, substations, and other infrastructure to satisfy peak demand.

A key to shifting South Australians to these tariffs is encouraging greater uptake of smart meters among existing households. While new builds have a smart meter installed by default – there is a need for a ‘critical mass’ of smart meters to encourage energy retailers to develop innovative products – meaning that established homes need to be encouraged and incentivised to have a smart meter installed.

The installation of smart meters can be expensive for consumers where upgrades to switchboards are required. This is a key barrier to smart meter adoption and has deterred many from pursuing solar panel installations. During the 2023 financial year, approximately 15% of RAA solar quotes that did not proceed cited switchboard upgrade costs as a key reason.

RAA understands the cost to install smart meters is generally passed on to consumers by retailers, with costs spread across their customer base. RAA believes if switchboard upgrades are required to install a smart meter, these costs should be considered part of the smart meter installation and should not burden individual households with upfront costs.

The GARP should complement the Government’s recently announced energy transition policy (in development) and, in line with the ‘greener’ GARP

2. [Final Report - Review into consumer energy resources technical standards \(RCERTS\) \(aemc.gov.au\), page i](#)

3. [Microsoft Word - 5.1 EV Smart charging - Response to consultation - December 2022.docx \(datocms-assets.com\), page 6-7](#)

4. [Final Report - Review into consumer energy resources technical standards \(RCERTS\) \(aemc.gov.au\), page ix](#)

Outcomes for Greater Adelaide (continued)

outcome, population growth areas in Greater Adelaide should seek to capitalise on community-level renewable energy schemes, such as Virtual Power Plants and community batteries.

Recommendation 3

SA Government take action to create a smart home ecosystem in South Australia through:

- Increasing smart meter uptake in established homes by ensuring necessary switchboard upgrades are installed at no upfront cost to the household.
- Further Government investment and expansion of community-level energy programs such as incentives for rooftop solar PV and home batteries, expanding Virtual Power Plants and installing community batteries in new developments.

Micromobility

RAA supports the use of e-scooters in SA as they can connect people with public transport on the first/last mile of journeys, improving accessibility to trains, buses and trams. The uptake of micromobility devices has the potential to replace cars for short or medium trips, contributing to reduced traffic. Also, as these devices are powered by rechargeable batteries, they can also assist in the decarbonisation of transport and contribute to a cleaner environment for the region.

In April-May 2023, SA Government sought consultation on laws for micromobility devices like e-scooters. To date there has been no decision made on the legality of privately owned e-scooters on public land. This is problematic from a safety perspective - according to our research 22% of RAA members believe that e-scooters are already legal to ride on public land.⁵

Designing an appropriate regulatory framework and implementing a comprehensive education and enforcement regime is important to ensure safe operation of these devices for all road and footpath users.

Recommendation 4

Should e-scooter use on public land be made legal, supported by a safest practice legal framework, the SA Government investigate and encourage investment in additional off-road paths to accommodate and encourage e-scooter use, as part of a broader plan to increase cycling and walking participation.

5. RAA Internal Research, May 2023

Outcomes for Greater Adelaide (continued)

Car sharing

RAA encourages the Government to consider car sharing an emerging trend that may impact land use in the Greater Adelaide region in the near future.

Research has shown that car share schemes can reduce the need for personal car ownership, with each car sharing vehicle removing between 7 and 13 private vehicles from the road. Vehicle Kilometres Travelled (VKT) also reduce for participants of car share schemes, with North American studies finding that VKT dropped between 7.6% and 80%. Research looking at the impacts of car sharing in North America has consistently shown it to reduce private vehicle use and ownership, while supporting sustainable modes of transportation (public transport, cycling, and walking).⁶

Car sharing may have the following implications for the GARP:

- Car sharing is a useful way to reduce parking demand for apartment living – a number of new apartments being built across the country have zero or less than one park per apartment, either within the building or nearby.
- Car sharing also helps with street space where new homes have reduced frontages – e.g., one old home may be knocked down with three new houses in its place, but the street space now needs to accommodate three homeowners instead of one.
- Car sharing (along with other forms of shared mobility) strongly complements public transport, which has the overall effect of driving higher patronage.
- More data and information sharing by shared mobility operators can help Councils and Governments better plan routes and infrastructure.

Connected and autonomous vehicles

RAA believes the SA Government should actively monitor developments in connected and autonomous vehicle technology, as innovation in personal vehicles and public transport can potentially have implications for the state's transport planning and land use. For example, over the long term, when fully autonomous vehicles exist – car sharing of autonomous vehicles could dramatically reduce parking demand. Connected vehicles may also travel more efficiently on roads and reduce the need for further development. These technologies may also require alternative road design features such as sensors.

RAA has considerable expertise in future mobility, and we look forward to working with Government to accommodate new technologies as they develop.

6. Shaw, M. *Twenty Years of Car Sharing: A case study on the City of Vancouver's role in the growth of car sharing in Vancouver*, Page 22

A greener, wilder and climate resilient environment

What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?

RAA is supportive of the GARP outcome of a greener, wilder and climate resilient Adelaide.

The need to take a multi-faceted approach to achieving this outcome is clear. There is a need to decarbonise transport through greater uptake of walking and cycling, as well as transitioning public transport to zero emissions, which we note is already underway. Already, South Australia is a leader in renewable energy generation; however, more can be done to decarbonise homes and we support the need for the GARP to identify opportunities for community energy generation and battery schemes at land division stage.

It is encouraging to see a strong focus on flood protection and disaster management in the Discussion Paper. RAA strongly encourages SA Government to maintain and elevate these elements in the GARP.

The increase of natural disasters and higher insurance costs has highlighted the need to reduce risk by investing in disaster mitigation measures and more consciously considering the relationship between land use planning and extreme weather risk.

The benefits of investing in disaster mitigation measures is highlighted by research commissioned by the Insurance Council, 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 has welcomed recent disaster mitigation investments from the Federal Government, including the \$1 billion Disaster Ready Fund, announced in October 2022. RAA believes this can go further and supports calls from the Insurance Council to move disaster resilience funding to a 10-year rolling program and for state and territory governments to match funding.

Disaster resilience funding could be used for measures to reduce risk to homes, such as community level flood mitigation (such as along the Gawler River), flood levees and home retrofits. Funding could also be used for buy-back schemes for those living in extreme risk areas, as

seen in other states. Such community resilience measures can further reduce flood risk to complement changes to planning and building codes.

The insurance industry is best placed to work with government and developers on ensuring new homes are not at adverse risk to floods, fires or other disasters. To this end, as South Australia's leading personal lines insurer, RAA is committed to working with industry and governments to help influence these public policy settings to reduce pressure on insurance premiums and avoid future financial costs to homeowners, businesses, governments, and communities.

Recommendation 5

Prior to completing the GARP, SA Government conduct targeted consultation with the insurance industry to better understand natural disaster risk in greenfield growth investigation areas. Where these areas are at adverse risk to floods or fires, alternative sites should be identified and/or development should only occur if risks can be appropriately mitigated.

This could include minimum building heights, the use of resilient construction materials or community mitigation options, such as levees.

A more equitable and socially cohesive place

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?

RAA is encouraged by the Government's focus on living locally and by identifying the need to further develop along public transport corridors.

RAA strongly supports increased investment in public transport in South Australia. An attractive and convenient public transport system can reduce carbon emissions and road congestion by encouraging people to reduce their reliance on private car use. It can also service the mobility needs of those unable to drive themselves, including children, older people, people with disability, people in financial hardship, and visitors such as tourists.

Unfortunately, use and satisfaction of public transport in South Australia is consistently poor compared to other mainland states. A 2021 Productivity Commission report on Public Transport Pricing found that South Australia has the lowest proportion of work trips that involve more than one mode of PT, with 5.5% of trips, compared to 21.2% of

trips in Perth (highest). According to Department for Infrastructure and Transport data, boardings are yet to recover to pre-COVID19 levels: Boardings for April to June 2023 were 15.9 million, compared to 19.4 million in April to June 2019 – a fall of 18%.

Furthermore, planning for public transport in new developments has not been done well in the recent past—adding to car dependency. For example, residents at Mount Barker that travel into Adelaide have few public transport options resulting in increased congestion on the South Eastern Freeway.

Public transport should be a consideration at the beginning of the investigation and planning stage of any future housing developments. This is particularly important for rail, where it is essential to quarantine land for a rail corridor from the outset. RAA supported the Government's decision to preserve land for a future rail



A more equitable and socially cohesive place (continued)

extension to Aldinga and supports preserving a corridor to extend the Gawler rail line to Roseworthy and further north to Freeling.

In 2022, RAA engaged the Legislative Council Select Committee on Public and Active Transport, making a submission and presentation at Parliament House. RAA believes the Government should conduct a holistic review of the Adelaide Metro network to identify:

- Improvements to Adelaide Metro network bus routes to better service business and education hubs and areas of interest outside of Adelaide CBD.
- Adelaide Hills to Greater Adelaide bus service improvements including priority for Glen Osmond Road to enhance service efficiency and reliability.
- Improvements to bus scheduling and stop locations, aimed at increasing service frequency and speed of travel, while maintaining adequate service coverage with consideration for vulnerable users.
- Ways to improve public confidence in the cleanliness and security on board public transport and at stops and stations.
- Identify strategic locations to install indented bus stops, priority bus lanes and traffic signals and new Park 'n' Ride facilities.
- Investigate reasons for low train patronage compared to other states and develop next steps to deliver service improvements of the train network, including optimising bus and tram services to better connect to trains and investigating options to increase service frequency of trains.

These recommendations were informed by research

conducted by RAA which included survey responses from 1,320 South Australians, with many responses commenting on a lack of service options for their main destinations.

The development of the GARP provides the perfect opportunity to conduct this review and implement changes for an enhanced public transport system.

Recommendation 6

SA Government conduct a holistic review of Adelaide's public transport network to optimise coverage and increase service frequency for the current population – with a plan to develop the network needed to support the future population and layout of the region.

Sustainable transport infrastructure funding

Accommodating an additional 300,000 homes will require investment in the transport system, including roads, public transport and active transport infrastructure. The projects required to make these improvements will likely require co-funding from the Australian Government.

RAA wishes to highlight that one of the main sources of road-related revenue – fuel excise – is shrinking 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.

For more than a decade, several tax reviews and reports from the Productivity Commission, Infrastructure Australia, and transport advocates have highlighted the problem with fuel excise and called for a fairer and more sustainable system.

In recent years, various state and territory government have introduced state-based charges on EVs. However, in October 2023, the High Court of Australia found that by majority s 7(1) of the Zero and Low Emission Vehicle Distance-based Charge Act 2021 (Vic) (“the ZLEV Charge Act”) is invalid on the basis that it imposes a duty of excise within the meaning of s 90 of the Constitution. With this decision, States are not able to collect a road user charge.

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.

A strong economy built on a smarter, cleaner, regenerative future



What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?

RAA encourages the Government to engage industry to understand the land use and urban design needs of knowledge-rich employers.

In 2023, the Committee for Adelaide produced its first ‘Benchmarking Adelaide’ report which compares Adelaide against a group of global peer cities across a range of metrics. This research found:

“Across most sectoral breakdowns Adelaide has a smaller share of jobs in high wage and knowledge-rich sectors. It is 5th of 6 peers for the share of jobs in business services, design and scientific R&D (7.1% in Adelaide compared to 9% on average). Such international figures reflect the need identified for more scientists, computer programmers, cyber security architects, and engineers, and for more variety of high value exports (South Australia Productivity Commission).”⁷

The report continues:

“Efficiency of Adelaide’s infrastructure and land-use is likely to become a bigger shaper of the city’s future productivity performance, as the city shifts into sectors that rely on speed, knowledge and an urban labour market.”⁸

The Government should review and consider the impact of initiatives like MAB at Tonsley and Lot Fourteen in the CBD and consider whether further innovation hubs in strategic locations can contribute to a smarter future for Adelaide’s economy.

7. [CFA-Benchmarking-Report_FINAL-DIGITAL_compressed-1.pdf](#) (committeeforadelaide.org.au), page 25

8. CFA Benchmarking Report, page 26

A greater choice of housing in the right places

What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?

RAA believes that the Discussion Paper does well to acknowledge the importance of a mix of housing types and locations. Our research demonstrates that the majority prefer free-standing home. However, people of different ages, and different family structures will have an appetite for different housing types – therefore a mix is necessary.

In late 2022 RAA asked its members about housing choice. The desire to live in a freestanding home was dominant, with 86% of our members indicating a preference for this housing configuration. However, the importance of housing options was clear when taking a deeper look at the survey results.

Preferred housing type and location varies by age, with younger members displaying a preference for free-standing homes and older members – for example those over 60 – showing a greater appetite for single story units. For families with young children, a free-standing home is the clear choice, but for 13% of families with teenagers, a townhouse was most desirable, compared to only 4% of families with children under 13-years old.⁹

RAA encourages the Government to explore policy options for providing greater choice of housing for South Australians. Other states have implemented stamp duty concessions or exemptions for pensioners looking to downsize. For example, pensioners looking to downsize and purchase a home for less than a specified amount could be eligible for a stamp duty exemption. A similar scheme in SA may increase housing supply and choice of housing.

RAA supports moving away from an infill vs greenfield target ratio, as was applied in previous 30-year Plan iterations. Instead, the Government should be looking to maximise the available land to build the residences that people want to live in, and this requires a mixture of urban infill, greenfield and satellite city development.

Recommendation 7

SA Government conduct ongoing research into housing choice – planning strategy and implementation should then be aligned with this research, to ensure that South Australians have access to their preferred housing type as they move through different life stages.

9. RAA internal research, January 2023

The urban form to bring our vision to life

What neighbourhood features enhance living and working locally?

The ultimate goal of living locally is to establish 20-minute neighbourhoods, where individuals can conveniently fulfill the majority of their daily requirements through a short 20-minute walk, bike ride, or public transport trip from their residences.

A well-connected and pedestrian-friendly neighbourhood stands as a robust solution to address various urban and environmental challenges. The presence of bike paths, footpaths, and accessible public transport not only fosters healthier lifestyles but also enhances connectivity to essential destinations.

A clearly defined transport network developed using Movement and Place thinking is important. For example, development immediately adjacent key distributor roads (with high “movement” function) should be limited to allow safe movement of all forms of transport, whilst precincts and local streets (with high “place” function) should facilitate a safe and accessible place for all users.

RAA has long called for greater commitment from the Government in developing the state’s cycling and walking infrastructure. The recent “Benchmarking Adelaide” report produced by the Committee for Adelaide benchmarked Greater Adelaide against 19 international peer cities. The report found: “Adelaide ranks last among peers for the quality of its bike network, and in the bottom 3rd among 170 American and European cities... it also ranks last among peers for access to people, jobs and educational institutions and shopping areas through low-stress biking routes”.¹⁰

The GARP presents a real opportunity to implement an active transport strategy and action plan, backed by dedicated infrastructure funding of at least \$10m annually. By making short/medium trips safer and more efficient to walk, cycle or use e-scooters, the Government can create a landscape that is supportive of living locally.

We believe the following should be prioritised:

- 1. Off-road cycle, pedestrian, and shared use paths**
- 2. Greater connectivity of on-road cycle paths**
- 3. Physical barriers between cyclists and motorists**

RAA has now conducted two ‘Risky Rides’ surveys, with the most recent report published in March 2023.¹¹ Our latest survey received 761 nominations from concerned cyclists and motorists that identified gaps in cycling infrastructure, resulting in the following top priorities for cycling infrastructure investment:

- Provision of new shared paths adjacent to roadways in the Adelaide Park Lands has the potential to reduce reliance on arterial road corridors. Shared paths adjacent Greenhill Road and Main North Road were the most highly raised suggestions in the 2022 Risky Rides survey. Specifically, a safer cycling route is required along Greenhill Road, from ANZAC Highway to Fullarton Road and RAA believes a new off-road shared use path is the best option.
- Within Adelaide, completion of the next stage of the Frome Street Bikeway between Rundle Street and North Terrace must be a high priority. Furthermore, a high number of nominations for east-west roads through the city indicates that there is still high demand for the provision of an East-West Bikeway to provide safer movements and better connectivity between the east and west of Adelaide.
- Ultimate completion of the North-South Corridor will deliver a major change in movement in and around Adelaide. Improved cycling connectivity must be delivered through the delivery of the North-South Corridor. Whilst the current South Road surface road has minimal provision for cyclists and is not a popular cycling route, it provides high connectivity with other cycling routes, both on-road in the east-west direction between Adelaide and the coastline, and with popular cycle corridors such as the Marino Rocks Greenway, Mike Turtur Bikeway, Westside Bikeway and River Torrens Linear Park.

10. [CFA-Benchmarking-Report_FINAL-DIGITAL_compressed-1.pdf \(committeeforadelaide.org.au\)](#), page 51

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

The urban form to bring our vision to life (continued)

- Due to metropolitan Adelaide’s grid-like structure, “diagonal” corridors that bisect the grid such as North East Road, Lower North East Road/Payneham Road, Port Road, Anzac Highway and Glen Osmond Road will always provide travel time and distance savings for cyclists commuting to and from the city when compared to alternative local-street bikeways. However, these corridors vary greatly in terms of the cycling infrastructure they provide. Therefore, any future planning needs to consider the primary function of these roads in Adelaide’s road network, ensuring that cyclist infrastructure is a key consideration. Off-road bikeways adjacent these corridors vary significantly in infrastructure, and with further investment and robust planning, have the potential to provide competitive alternatives to on-road cycling in terms of total commute time.

Further, availability of community and local transport options, such as the Keoride on-demand bus in Mount Barker is important which provides an effective and highly utilised first and last-mile connectivity to the Mount Barker interchange. A reliable and convenient public transport system makes it easier for residents to commute and access essential services within and beyond the neighbourhood.

Access to car-parking is a regular concern raised by communities, especially in brownfields areas where urban infill occurs through property subdivisions. Many within these communities feel entitled to an on-street car park, whilst garage space is often utilised for storage or as an extension of the home to facilitate a home office, gym, or entertaining room. On-street parking demand should be a consideration for developments that lack adequate parking facilities. On-street parks should consider the requirements of typical vehicle buying preferences, for example EVs are often wider than many Internal Combustion Engine vehicle models.

Recommendation 8

Alongside the GARP, SA Government should develop, and fund the implementation of, an active transport strategy and action plan to support greater uptake of cycling, walking and micromobility.

Comments on infrastructure and services

RAA supports population growth and is buoyed by the Government’s intention to plan for a high growth scenario. In the past, infrastructure has not always kept pace with population growth and housing developments, with issues in Mount Barker being well-documented. There are also flow on issues with the ‘middle infrastructure’, where developments create congestion on roads several kilometres away.

In early 2023, RAA surveyed members to understand their views on population growth. While many opposed population growth, the main issue was that the infrastructure was 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.

RAA strongly believes that the GARP must ensure housing developments, both greenfield and infill, are supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibilities and transparency for action.

RAA is hopeful the establishment of the Housing Infrastructure Planning and Development Unit will help ensure the right infrastructure is in place to support future growth.

If infrastructure doesn’t keep pace with growth, there will be significant implications for safety, productivity and liveability.

Where should Adelaide grow?



Greenfield and satellite city growth

What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?

As a travel provider, RAA is deeply aware of the tourism appeal of Victor Harbor and the Riverland, for which Murray Bridge serves as an important hub. Should government target these locations for development to accommodate a growing population – we strongly support protecting the tourism characteristics of these areas that attract travellers from within SA, interstate and overseas. For example, among domestic tourists, there were 1.4 million trips to The Murray and 834,000 trips to the Fleurieu Peninsula in the year ending June 2023.¹⁴

Development should not diminish the appeal of the natural environment or detract from attractions or accommodation for tourists.

Recommendation 9

SA Government ensures that Victor Harbor and Murray Bridge areas maintain their unique tourism characteristics with any development plans.

What do you see as the benefits and potential drawbacks of greenfield development?

Ultimately the benefit of greenfield development is the increase in supply of freestanding larger homes which are most desirable for South Australians.

In principle, in all growth areas, it is important that the required road and access infrastructure improvements keep pace with the growth in population, or preferably are undertaken prior to the completion of large urban estates.

The Government can learn from experiences where a lag in road development has negatively impacted residents, including in Mount Barker (Heyesen Boulevard) and residential growth areas (Angle Vale, Playford Alive, Blakes Crossing, Playford North Extension within the City of Playford - Curtis Road, Heaslip Road).

RAA suggests that the ‘living locally’ concept is particularly important for greenfield developments in outer areas. Typically transport costs are higher for people living in the outer suburbs. Therefore, it is important that

greenfield sites be developed with consideration of urban centres that provide employment opportunities as well as services such as shopping and health care.

Movement and place thinking should be integrated into the further development of all urban precincts. This thinking recognises that streets can serve as key destinations in their own right and is useful for the practical implementation of transport planning objectives.

Land available for greenfield developments is often at higher risk of floods or fires. RAA recommends that the Government work with the insurance industry to understand the risks and to ensure that new homes and infrastructure are built to a higher level of resilience where needed.

12. [Domestic tourism results | Tourism Research Australia](#)

Comments on proposed greenfield and satellite city investigation areas

As stated previously, RAA strongly believes that the GARP must ensure housing developments, both greenfield and infill, are supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibility and transparency for action.

RAA makes the following comments around what transport infrastructure investments would need to be made in proposed greenfield investigation areas.

North-western spine

The GARP Discussion paper notes the potential for additional housing along the southern end of the Port Wakefield Highway. Safety along the Port Wakefield Highway is of concern, and improvements to roadside barriers and intersections are highly important, given the current 110km/h speed limit. RAA is particularly concerned about safety for vehicles turning right from Port Wakefield Highway, Mallala Road or Brooks Road.

The recently signalised intersection at Angle Vale Road/Riverlea Boulevard is the only such intersection between Port Augusta and departing the North-South corridor near the city. Should this intersection be grade separated, it would be safer and promote the free flow of traffic, akin to a freeway interchange.

Depending on the proposed development in Two Wells, primary access to town (Mallala Road or Brooks Road) should be upgraded, and potentially grade separated also (depending on projected population).

Increasing urban development in Virginia is also increasing traffic at the Old Port Wakefield Road intersection, and investigation into safety treatments at this location should also be undertaken.

RAA supports extending the Gawler rail line to Roseworthy along the existing disused rail corridor, noting the future possibility of extending this further north to Freeling.

North-eastern spine (Kudla to Evanston Gardens)

Importantly, these areas are adjacent the Gawler Line and are therefore already well connected to Adelaide by public transport. Continued investment in the North-South Corridor also means this area is now a 35-minute drive (approximately) from Adelaide. As development accelerates, access to these train stations is important.

Eastern spine from Callington to Murray Bridge

Major growth in the Callington/Murray Bridge area (combined with Mt Barker/Nairne and Strathalbyn) will put added pressure on the South Eastern Freeway without providing significant opportunities for local employment and other amenities.

This would provide more justification for an Adelaide – Murray Bridge rail line via Mt Barker and Callington. However, a train trip from Murray Bridge to Adelaide via Mt Barker, Blackwood/Belair/Mitcham etc probably wouldn't compete well from a travel time perspective, compared to on-road options (bus/private vehicle).

RAA have previously recommended Murray Bridge as a possible trial area for on-demand bus transport to improve local accessibility.

Southern spine and opportunities around Victor Harbor and Goolwa

Road upgrades are needed, including to Main South Road between the Southern Expressway and Victor Harbor Road (we note that a planning study is currently underway).

The Government should also be looking to duplicate Victor Harbor Road between McLaren Vale and Mount Compass (A corridor study has been recently undertaken, with RAA providing input in 2021).

Additional upgrades to the Victor Harbor Road and Goolwa Road corridors will be needed to improve safety and efficiency/capacity between Victor Harbor/Goolwa and Mount Compass.

Comments on proposed greenfield and satellite city investigation areas

Alexandrina Road between Goolwa and Strathalbyn, and Port Elliot Road between Victor Harbor and Goolwa may also require upgrades because of significant population increases around Goolwa.

RAA have previously recommended Victor Harbor - Goolwa as a possible trial area for on-demand bus transport to improve local accessibility and the need for an appropriate public transport solution is increased with a growing population.

RAA encourages Government to investigate the following:

- Would on-demand transport be effective in Greenfield investigation areas?
- Will there be safe and dedicated access to the train stations for active transport?

Recommendation 10

SA Government consider the following at the commencement of investigating greenfield areas:

- the capacity, connectivity and safety of roads and intersections
- availability of efficient public transport; and
- connectivity for active transport.

Government should then commence improvements and upgrades at the early stages to ensure new residents to these areas are not unfairly disadvantaged.

Urban infill growth

Where is the next generation of strategic infill sites?

The Discussion Paper poses a need to investigate strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth. RAA would like to offer the following comments regarding these areas.

Access to these centres is often primarily by motor vehicle, and they're not always well served by active modes of transport, or even public transport – despite being a hub for public transport out of the urban activity centre. For shopping trips, many will prefer to take a private vehicle to avoid walking, cycling or taking public transport with shopping. There is often demand for urban infill around these centres (e.g. within walking distance of the major public transport hub) and planning codes should allow for denser style living, where it is not essential to own a car to get around, and car sharing

schemes may provide sufficient access to a motor vehicle for residents.

Existing centres are often managed by large retail groups (e.g. Westfield), and there are concerns about users parking in retail car parks to then use public transport or other nearby facilities – and leaving insufficient parking for visitors to the centre. For example, parking fines are regularly issued to commuters at Tea Tree Plaza in Modbury who use the shopping centre car park to access the public transport interchange. This same centre saw controversy when the car park was blocked off in the mornings to prevent staff and visitors to Modbury Hospital from using the shopping centre car park.

Urban space and urban greening

What are the most important factors for the Commission to consider in meeting future demand for open space?

A significant amount of open space will be returned to the community upon completion of the North South Corridor, and provision of a continuous, safe and separated cycle corridor. As stated previously, South Road currently is not a popular cycle corridor but does link in with several key corridors e.g. West Side Bikeway, Mike Turtur Bikeway, Marino Rocks Greenway.

There is room for improvement in off road corridors in metropolitan Adelaide in terms of accessibility to commuter cyclists, with many opting to cycle on arterial roads (the less safe option) instead. Bikeways along local

streets can provide a safer riding environment, but often come at the expense of increased travel time. Some direct corridors, including the Mike Turtur Bikeway and the Outer Harbor Greenway, could be enhanced to give path users continuous travel across local streets. Others such as the River Torrens Linear Park Path may have capacity for dedicated cycleways.

Safe routes need to be openly and easily available to potential users, and improvements to wayfinding and delineation of the routes themselves are also needed.

Further comments

The Discussion Paper 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 GARP 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.

RAA supports and encourages the roll out of electric and hydrogen powered buses and trains to reduce the carbon footprint of the public transport system and further offset emissions for those who choose public transport as an alternative to driving privately owned vehicles.

Electrification of the Gawler and Seaford rail lines is welcomed, and opportunities for the Outer Harbour, Grange and Belair lines must be explored as diesel trains approach the end of their service life. We note that Government is exploring hybrids and hydrogen powered options and this should continue.

New urban developments must be accessible via public transport and RAA strongly supports extension of the Seaford line to Aldinga, and extension of the Gawler rail line to Roseworthy. Investigation into the provision of public transport is required at new and future developments including Riverlea (Buckland Park), Dry Creek and Concordia.

**Submission to the
Greater Adelaide
Regional Plan**

November 2023