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Housing Strategy Green Paper
GPO Box 292
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Sent by email: housingstrategy@sa.gov.au

RE: Comments on *Housing strategy for South Australia. Green paper*. Government of South Australia.

As the peak conservation body for South Australia, the Conservation Council of South Australia (Conservation Council SA) welcomes the opportunity to comment on the ***Housing strategy for South Australia. Green paper***.

Conservation Council SA is an independent, non-profit and strictly non-party political organization representing over 50 of South Australia's environment and conservation organizations and their supporters. Conservation SA has developed a comprehensive view of environment policy in "South Australia in a Changing Climate: A Blueprint for a Sustainable Future"[1] This document sets out, at a strategic level, policy positions in six key environmental areas, including planning and development issues.

The Conservation Council of South Australia welcomes the preparation of the Housing Strategy for South Australia as a key guiding document to steer the planning of housing and communities in the most sustainable and resilient direction.

Opportunities and drivers for change

The Conservation Council agrees that Housing policy shapes our cities, towns and suburbs and how we live in them.

In setting the stage for looking at future directions, the Conservation Council SA suggests that a more detailed portrayal of environment and sustainability challenges must be outlined, in order for the strategy to address these challenges in an integrated manner.

[1] http://www.conservationsa.org.au/blueprint.html

In particular, environmental drivers for change extend far beyond the need for environmentally sustainable construction techniques. The housing Strategy therefore has a role in demonstrating an integrated approach that complements state sustainability, biodiversity and climate change frameworks and targets. The challenges start at a landscape scale in determining how and where to establish new housing settlements and, within existing settlements, how these can be undertaken without causing harm to urban environments.

Increasing Fuel Costs

Access to low emissions and fuel-efficient public transport options should be recognised as a key driver for change, particularly as communities will face higher fuel costs due to diminishing oil reserves and carbon pricing policies.

The incorporation of local food production to build resilience in local communities is a driver for change.

State Biodiversity objectives

The SA Strategic Plan *five Nature links corridors* across South Australia and the *No Species Loss target* are also drivers for change that require an integrated housing policy which is also supportive of improving natural habitats. To date, the Adelaide Parklands that serve as an iconic attribute of Adelaide, have not been matched by equivalent open space or environmental protection in the broader greater metropolitan area. There is a need to build such areas that provide environmental services in the areas targeted for 30% of future housing expansion in the fringe areas.

Establishing new areas of housing provides the best opportunity to create wildlife friendly opportunities such as through cat free communities and choosing garden species that support diverse birdlife and other native species.

Ensuring better outcomes in protecting native vegetation including significant trees and biodiversity habitat. Bulldozers and chainsaws targeted towards vegetation are still often seen as the first action in housing developments and re-developments.

Changed Population Targets

An additional driver for change that has not yet been fully addressed are changes in South Australia's Population Target. With the SA target for two million people by 2050 now being brought forward to 2027, the housing challenge has just got harder. The Housing Strategy must therefore tackle the new population projections to 2040 (in line with the length of the 30 year Plan for greater Adelaide) and to 2050 and beyond.

The Conservation Council of South Australia does question the assertion that there can be sustainable population growth. Whilst there may not be a magic number for a sustainable population, the impacts of human settlement across the landscape have already been too high. Population growth to date has continued causing a greater footprint and negative environmental impacts. Whilst appreciating the

strong short term reasons that drive population growth policies, in logic, population growth cannot continue forever.

Climate change and greater risks associated with extreme weather events

The Housing Strategy should provide some guidance in planning to incorporate climate change risks. Priority areas of concern include:

- restricting new development in hazard areas such as the bushfire prone Mount Lofty Ranges, or flood plains such as that of the Brownhill and Keswick Creeks and Light River,
- Ensuring that climate change is taken into account to provide adequate set back distances:
    - for coastal ecosystems to move landward;
    - for human settlements to be protected against bushfire coming from native vegetation and to ensure that native vegetation is not placed at risk due to poor planning
    - to allow for more severe flooding near waterways and in low lying areas.

Proposed actions to support sustainable neighbourhoods and communities

Given the broader challenges and drivers for change as outlined above, the Strategy could be strengthened and provide a more detailed approach on how new and redeveloped housing can address these challenges.

Affordable Housing

The Strategy could be strengthened in providing guidance on the need for developers to be creative in building housing that are affordable and more sustainable, that use less energy, that incorporate community scale renewable energy, water supply and recycling, food production and home based employment.

The strategy to provide increased "affordable housing" through not-for profit providers (provided they remain so and are not privatised) and social housing renewal is supported. In all housing provision, due regard must be had to off-site impacts such as site amenity (vegetated streetscaping), nearby job availability, availability of frequent and reliable public transport, facilities for non-motorised transport, vegetated public open space and a healthy and biodiverse natural environment. The term "affordability" should encompass all offsite costs such as transport and lifecycle operational costs.

However, there are limits to provision of social housing through private enterprise, as can be seen for the high rental costs of recently constructed housing for students in Adelaide. The Housing strategy should therefore be strengthened in how it will prioritise the need to provide sustainable and affordable housing opportunities to

less advantaged groups within the community including to aboriginal South Australians and to younger south Australian's such as students and first home seekers that do not have the income or capital wealth to pay for more sustainable housing services. This is important particularly with sharp increases in costs such as for transport, electricity and water services.

Affordable housing can be pursued through:

- refurbishment and retrofitting of existing buildings by:
    - government acquisition of large dwellings as they become available, and subdividing them into smaller dwellings within the existing building;
    - converting garages to dwellings, given the oversupply of car storage, on site and on street;
- limiting floor area of new dwellings, given that there is an oversupply of large dwellings, given the well established trend to lower household occupancy rates;
- providing housing without car storage, given that many households do not have a car (in Adelaide 12% in 1996, according to Australian Bureau of Statistics);
- not providing communal facilities in multi-dwellings enclaves from which outsiders are excluded;
- limiting the number of duplicate services in dwellings, such as toilets and bathrooms.
- ensuring new housing minimises lifecycle energy costs as indicated in the paper from DTEI: Perkins et al), *Transport, housing and urban form: The life cycle transport and housing impact of city centre apartments compared with suburban dwellings*. 751-761 www.fbe.unsw.edu.au/cityfutures/SOAC/transporthousingandurbanform.pdf
- discouraging individual over-investment in housing such as over sized housing and holiday houses, through taxation reform and market regulation;
- ensuring efficiency ratings of appliances and buildings reflect actual results in practice.

I would also be happy to meet with you or your representatives to discuss these matters in more detail.

Please contact me on Ph. 08 82235155 or email at tim.kelly@conservationsa.org.au if you have any questions or follow-up in relation to this letter.

Yours sincerely

Tim Kelly

Chief Executive