



Mt Barker & District Residents' Association Inc

PO Box 494 Mount Barker, South Australia 5251

For the Community

3 August 2010

The Presiding Member

DPAC (Mount Barker DPA)

Department of Planning and Local Government

GPO Box 1815

Adelaide SA 5001.

Email to dpac@sa.gov.au

Mt Barker and District Residents' Association response to the Ministerial DPA.

The Mt Barker and District Residents' Association is extremely concerned about the proposed Mt Barker Urban Growth DPA presented to the community for feedback. **We completely reject this current Mt Barker Urban Growth DPA and also support our Council in their rejection of this DPA.**

The DPA is seriously flawed in all key planning areas and we have identified these throughout our submission. Please note this submission includes extensive feedback from our members and as such incorporates the ideas, thoughts, opinions and concerns of many residents from the Mt Barker community.

The overall feeling of this community is that this DPA is simply a major land grab by a group of wealthy developers, intent on creating more personal wealth by destroying an existing community. We question the Minister's intent and sincerity in this whole process. We question the ability of a community to be heard appropriately. The media has highlighted many individuals' and groups' concerns about significant aspects of this flawed plan. It appears there might have been some 'greasing of palms' in this whole process, because it makes absolutely no sense at all. In fact, it stinks! The Minister has not implemented any community engagement activities and the District Council of Mt Barker has had to expend ratepayer's funds to organise information sessions to explain the DPA in detail. This is unequitable and does not match the Premier's advice where he said he would engage with the community.

Importantly, we question why a Ministerial DPA had to be created for this DPA? It is the only DPA from the 30 Year Plan for Greater Adelaide (30 Year Plan) which is Ministerial. Would it have something to do with fear of developers? Or could it be that funds have been exchanged and deals done? These are all questions that the community has been asking since the release of this absurd document and it is incumbent on the Minister to answer them. We repeat again, we completely reject this current Mt Barker Urban Growth DPA and also support our Council in their rejection of this DPA

Scale and scope

The scale of the development is so great that it is not just 'an amendment' - it is a whole new town of up to 30,000 people. The existing town - streets, car parks and services - are not set up for being swamped in this way and will be unworkable. Ludicrously, the DPA says there will not be any impact on the town centre because the new 'neighbourhood' zoning will allow for some retail/services throughout the growth areas. However, a close reading of the DPA says this will only happen if developers want it to! There is no certainty within this document about managing growth and expansion. There is no indication of a staged approach. And the time line has been reduced from 30 years to 15 years without any further explanation.

Sustainability

The Ministerial Mount Barker Growth DPA is essentially a nineteenth-century concept of the kind that spawned the growth of suburbia in our cities – the unhappy results of which our cities are still dealing with. South Australia will miss a unique opportunity to develop town-planning initiatives that would position it as a world leader in social/urban development if it implements this plan in its current form.

World population and design opinion has moved away from suburban sprawl as a viable means of housing people. Particularly now, in a world that is threatened by scarcity of water, food and energy resources and one in which pollution is a major threat to human life on the planet. And alienation of productive land for housing is nothing less than national suicide.

The current plan is ecologically and socially untenable. It is completely understandable that the plan is supported by the developers and the real estate industry because its operatives stand to gain considerably from its implementation,¹ but the Government's priority should be the benefit of the whole community, both now and – especially - in the future.

The population increase proposed and expected is of such a magnitude that nothing less than a complete re-drawing of the Mount Barker Development Plan is required. This re-drawing should take into account issues such as:

- the decline of food production in the world (Cribb, 2010) and in eastern states in particular;
- the apparent issue that Victoria last year imported food for the first time in its history;
- the fact that Coles in Mount Barker buys its bacon from Canada (Mount Barker used to supply bacon to the nation);
- the fact that foreign nations (USA, China, Q'tar) are buying up Australian agriculture resources to supply their own future needs – not ours (ABC National);
- the Federal Government's *sustainable* population policy;

¹ Although it should be noted that agents who are not directly involved in the development believe that their incomes will be reduced due to deflation of resale prices of homes that are currently in existence (see *The Courier*, 28 July, 2010).

- the findings of the Senate Select Committee on food security;
- the need to include women's needs in neighbourhood design (Watson, 2010);
- The Murray-Darling Basin Commission and the Wentworth Group report that the Murray-Darling Basin will receive 50% less water in the future; and
- criticisms of the 30-year Plan printed in *Smart Farmer* on 1 July, 2010, and in *The Advertiser* of the published views of eminent people like Ken Henry, David Chalke, Ralph Clarke, Ziggy Switkowski, Dick Smith, Tim Jackson and Kevin O'Leary and the Waite Institute and Deakin University.

It would also be wise not to proceed until the Federal Government has enunciated its *New Cities Strategy*.

Employment

Certainly the development must allow for employment, and this will have to be in light industry. But light industry can only be secondary industry, and secondary industry value adds to primary industry. Mount Barker has no timber or mineral primary production on which to base secondary industries.² However, it does have prime agricultural land and it is logical to base any secondary industries on this. But, this prime agricultural land is designated for housing development by the DPA – thus, destroying the only local source of primary production available. The town is not likely to develop sophisticated electronic industries in competition with low waged countries in Asia. Therefore, value adding our primary production is the only way to develop secondary industry.

Thus, it is logical to reserve the available agricultural land for food production³ and create secondary industries in packaging, value-adding and distributing these products nearby⁴ (as well as some employment in the primary aspects themselves). A dedicated place should also be provided for a grower's market.

Planning of this magnitude and nature was done in the 1950s, when Elizabeth was developed and it can be done again – once more placing South Australia in the forefront of town planning.

The Government's short-sighted view is that because the agricultural land around Mt Barker is not extensively-farmed now, it is of no value for primary production. This land is capable of producing food for centuries although intensive land use requires higher inputs of water, fertiliser, chemicals and is not sustainable in the long term. The Government does not have the vision to look forward 50-100 years when this land will be one of the few areas with excellent soils which has good rainfall. The Government also argues the landholdings are too small to support commercial cropping, but is that a reason for covering them with bitumen and houses? A visionary approach would be to build

² Tourism is another possibility, but the DPA proposes building housing on the existing picturesque countryside.

³ As the increased population will provide surplus non-potable water that will require ecologically-sound disposal, this water could be provided for food production on the land. To encourage the development of this primary industry, food producers could be given ten years rates free.

⁴ Like the Beerenberg enterprise in Hahndorf which, it is understood, is looking to expand.

nearby on poorer soils but preserve the better areas as an agricultural heritage area with appropriate buffers of habitat.

Lack of public consultation

We refer you to two quotes by Minister Holloway in recent weeks which are of extreme concern to this community:

'We can't allow the future growth of our State to be impeded by individual Councils who just think, well look, just shut the door.' - ABC Ch2 7pm News 22 June, 2010 and

'We've developed the 30 Year Plan on the basis that this is a sustainable level of growth and that's why we don't believe there's any need for any revision.' - ABC Ch2 7pm News 25 July 2010.

These two comments indicate the arrogance of the Minister in treating both our Council's and our community's responses as irrelevant, unnecessary, and worse, to be ignored as part of this process. The DC of Mt Barker was forced to fund consultants (at a cost of \$100,000) to organise six information sessions, prepare investigation reports and a 500 resident survey to determine feedback to this DPA. The Government has done nothing to support community engagement by informing its citizens about this plan. It has neither the courage nor the foresight to know that an engaged and supportive community would make this process a much more valued one than is currently the case.

Mount Barker is not anti-development

The Minister has indicated that the community in this District is anti-development. It certainly is not anti-development as evidenced by the recent growth and development in the District. It is the fastest growing town in Australia with a population growth of 2.7% per annum (Cega and Econsearch, 2010). Much of this development was initiated by the local Council in a staged, managed Development Plan Amendment (DPA) in 2006/07 where the majority of infrastructure costs were to be, and have been funded by developers. In fact, development has been occurring regularly since 1996 when the first major subdivision was established in the District with the establishment of the Martindale development.

It is the size, scale and uncontrolled manner of this DPA which is of concern to the community. It will effectively double the population in a very short space of time, without appropriate infrastructure and services support. The Council's concerns about lack of infrastructure are predicated on the fact that the current development infrastructure is significantly lagging despite the developer's contributions. As one resident noted recently, *'Our suburb was the first to be subdivided in 1875 and we still haven't got footpaths'*. In Council's agenda papers of 2 August, 2010 it notes: *'Pre the DPA, Council was already under some stress (financial and staff resourcing) as can be evidenced by its struggle to cope with the current infrastructure demands to accommodate its historic high population growth'* (p12).

Developer Consortium directing planning for the Mt Barker district

The influence of the Mount Barker Consortium, in conjunction with Connor Holmes, on the Minister is another key issue which destabilises this DPA. The Consortium is directing the planning of the

District without input from the Council or the community. This is wrong! It is undemocratic, is collusive in nature and defies the Government's stance of being open and honest to its community. It is also, we believe, a serious conflict of interest. We support our Council if it chooses to undertake a judicial approach similar to that which the Gawler Council has now undertaken.

On the following pages, we present to you a summary of the Mt Barker community concerns about this DPA.

PLANNING ISSUES IN THE DPA

1. Inconsistency with the 30 Year Plan for Greater Adelaide

- The 30 Year Plan was supposed to be the strategic plan for Adelaide's future development. How can the DPA differ from it? Is there not a legislative requirement to use the DPA to address the 30 Year Plan targets?
- There are serious discrepancies between the 30 Year Plan and the DPA re population numbers. The 30 Year Plan indicated 15,600 new people to the region, but the DPA indicates 30,212 people.
- Also, the DPA, which completely ignores the 30 YP numbers, says up to 30,212 new people are coming to Mount Barker over 15 years not 30. This growth is 97% which, averaged over the 15 years is 6.5% pa, five times the 1.4% growth the Minister asserts.
- The 30 Year Plan (p 91) shows the total SA 30 year growth population of 560,000 spread over the regions, with the Hills portion of this projected at 29,000: Murray Bridge to have 13,400 new residents and Mount Barker to have 15,600. The 30 Year Plan, and therefore 15,600, is an official and adopted part of SA's planning rules. Therefore, 15,600 is the population increase for 30 years, so the DPA is completely incorrect in stating up to 30,212 new residents in 15 years.
- The housing projections are inconsistent with the 30 Year Plan - 11,487 in the DPA, compared to 7,000 in the 30 Year Plan.
- There are significant variations to the town boundaries shown in the DPA, in comparison to the 30 Year Plan; again we question the legitimacy of this variation. These have been adjusted without consultation or explanation. Is it due to either land owners not wishing to sell, or developers influencing the Minister and Planning Dept?
- The 30 Year Plan includes TODS in its plans; this DPA does not mention them.
- The 30 Year Plan aimed to support the preservation of character and rural production but these have not been honoured.
- The 30 YP had 280 hectares of land for employment (p 105 map D10). This has disappeared in the DPA. There is only mention of 41 hectares of new light industrial land which is certainly not going to generate the 13,000 jobs in the 30 YP for the whole Hills region.

2. Inconsistency with the Council's Strategic Plan; current Mt Barker Development Plan

- There is no consideration of the Council's Strategic Plan objectives in this DPA.
- There is no linkage to the current Development Plan. The addition of the proposed DPA into the existing Development Plan will create a huge chasm in strategic and philosophical intent.

- How will Council's DAP be able to adequately preside over future planning applications and decisions if the Development Plan contains inconsistencies?
- The existing Mt Barker Development Plan includes many building rules like preserving the natural beauty of the landscape. The DPA overrides these rules and destroys this natural beauty and along with it the precious flora and fauna - some of which are endangered species. Building on land nearby would obviate this.

3. Unsustainable and inconsistent population projections

- There is significant inconsistency with the 30 Year Plan re the population targets as stated earlier.
- The population projections are based on a growth strategy which is inconsistent with maintaining a rural and green area ie more population, more housing, more loss of valuable agricultural land.
- The DPA is also inconsistent with the Federal Government's objectives for a sustainable population. We support the Prime Minister's recent announcements of achieving sustainable population targets without destroying the current population's quality of life.
- The reduction of immigrant intakes, the establishment of a State Government Board to review the population strategy are two elements which indicate a pause is required before further growth is planned. Therefore, we question why you would continue with a growth strategy in this DPA whilst this policy is being reviewed?
- Importing people from overseas whilst our own youth suffer from unemployment and social isolation is not a positive strategy.
- Population increase does not equal economic growth or prosperity (eg India). Switzerland and Scandinavia have high prosperity but no population growth (Hugo, 2009).

4. Unsustainable and inconsistent housing projections

- The housing projections are inconsistent with 30 Year Plan - 11,000 in the DPA but only 7,000 in the 30 Year Plan. How can such a large discrepancy occur?
- The DPA includes zoned lands which are far greater than required for the low and medium scenario (pp 24 and 25 DPA) described. The only conclusion is that it is intended to use the High scenario and fill the areas completely with houses and people.
- The housing standards are mentioned only briefly but not explained or described in sufficient detail. These should be sustainable and identified in the DPA.
- Where is the 6 star housing rating providing sustainable housing options? Although this 6 star rating is a joke to everyone, the HIA has informed the Government that it is only a marketing term. Therefore it is meaningless.
- The Scholfield Robinson Report is a disgrace. This is the report that the DPA is basing its premise on about the land not being good quality agricultural land. This four page draft which condemns the land as unworthy has been used as the foundation for the DPA. The consultants only contacted two growers/market gardeners. Is this good planning advice?
- Why does the DPA not use our own expert Government Departments when considering the value of this land? PIRSA has indicated this is primary and secondary rated land and is still useful for agricultural or horticultural pursuits. Why is this advice being ignored?

- The size of this plan is so great that there should be a total revision of the whole Mt Barker Development Plan, not just creating suburbia in areas that cannot sustain it.
- There is no evidence that the scheme adequately provides for eco-friendly housing design. It provides for creative design of housing and precincts (p.75), but we need some regulatory means to prevent developers doing the same old thing. If this can be done there could be some innovative and outstanding design included in new housing projects.
- Connor Holmes recommends 450 dwelling constructions per annum which is much higher than the current rate of 237 per annum (pp.25-26). We object to this as being too high. The district already has trouble coping with the current rate.
- Firm government plans to provide affordable housing need to be included in the DPA and not be left to the private sector to provide it.

5. No funding or planning for the utility infrastructure requirements

- There are no infrastructure plans detailed in the DPA. There is neither statement about requirements and no costings nor any indication of where the money is coming from.
- A recommendation in Report 12.4 of the District Council of Mt Barker's Council Agenda papers of 19 July 2010 states: "*Note that the preliminary estimate of new/upgraded infrastructure implications arising from the Ministerial Development Plan Amendment ("MDPA") is in the order of \$500 - \$525 million (exclusive of GST and other elements), which would be staged over a considerable number of years and includes assets that would vest in Council from the developers of new subdivisions and requirements for works on some roads that are a State Government responsibility and the additional freeway interchange*"; There will be a lifetime impost on existing ratepayers for these future infrastructure costs. We question the equality of this strategy.
- We question whether there is a legal requirement to explain in detail how infrastructure will be detailed, planned and funded?
- Road services will be used by increased traffic; where does the funding come from to maintain these road networks, as well as fund new ones?
- Who is paying for the connector ring routes? Council estimates the ring routes will cost more than \$55 million. How can such a small community fund these extraordinary infrastructure costs?
- Clearly a second Freeway interchange is required. But what happens to the plans and DPA if the second Freeway interchange does not eventuate?
- The STEDS scheme has no land set aside for expansion.
- Power stations are required - in particular at least 2 sub stations. There is no land set aside for these. The DPA includes electricity provision and planning for only 4,000 new homes, not the 11,500 planned for in the DPA.
- At least two new electricity power sub-stations and new powerlines and easements will be required.
- One new STEDS (Wastewater/Effluent Disposal) or the decommissioning of the existing system and constructing a 50,000 person STEDS scheme will be required.
- New roads, streets, kerbing, roundabouts, guttering and footpaths not planned for.
- A much greater assessment of facts and figures are required within the DPA discussion section. Most of the data has come from the developer consortium and consultants.

- There is a great deal of community dissatisfaction with the current infrastructure, so why create more infrastructure problems? The community wants the current problems addressed first before any further development occurs.
- ‘ It is beyond Council’s resources to provide much of the physical and social infrastructure associated with the urban expansion growth areas outlined in the State Government’s Plan’(District Council of Mt Barker, Annual Business Plan 2010/2011.)

6. Inappropriate land use and site features, zoning issues; loss of critical agricultural quality land

- The loss of critical agricultural quality land is concerning considering PIRSA’s assessment of this land. We insist on having the PIRSA soils map superimposed on the proposed development and the exclusion of the most (potentially) productive land, especially that which can be irrigated from the sewerage treatment ponds, from development (p.57 indicates that there will be surplus non-potable water requiring disposal). This would result in pockets of productive green amid the houses, as in rural Italy – a nice compromise and mix between buildings and nature. Also as buffers between houses and traffic or industry.
- The Residential (Neighbourhood) zone is such a large area and is so widespread, it should be divided into three or four parts and released progressively in stages. P.25 thinks that this *could happen*, but we insist that it *should happen*. In effect, it allows developers to determine zoning rather than the Government or Council by not providing a greater cross section and integration of varying zones as is currently the case in the Mt Barker Development Plan.
- There is extreme community concern about development being able to occur to a minimum of 150sqm blocks adjacent to neighbourhood centres. As there is no apparent height limit on housing developments this could result in extremely high apartment blocks and flats. It is easy to see, particularly in other parts of the nation and world what type of communities these create.
- Further to this, high rises near neighbourhood centres need TODs nearby to facilitate transport to employment and other activities. There are no plans for these in the DPA.
- There is no clear location of local neighbourhood centres zoning in the DPA. Where will these be located exactly? How will they link to the housing estates? How will the traffic be managed to and from these? Again, no detail or information is available in the DPA.
- There is no zoning for public purpose activities eg recreation, sport, or lands for open space. The DPA mentions the Golf Club and the new land purchased by the Council at Bald Hills Road but this new land is not zoned public purpose in this DPA. If the Council becomes short of funds (or bankrupt as we anticipate if this DPA is implemented) they can easily sell this land to a developer for more housing. Thus there is no safeguard that this land will be used for future recreational pursuits. And who will fund the development of recreational pursuits on this land?
- It is clear that the DPA is simply allowing an enormous and impractical extension of the town boundaries and for these new areas to be developed for mass housing, with small block sizes, for lots of people who won’t ‘live’ in the area, but just sleep here.
- There is no identification of buffer zones between housing and agricultural areas (eg the other side of the town boundary).

- The DPA destroys the regulations that the Council has developed for the protection of buffer zones.
- There is no identification of how housing will be placed adjacent to the major power transmission lines traversing the new areas. Again, will these lands adjacent to these lines simply be developed at lower costs, thereby attracting lower socio-economic families who then become sick living so close to these lines?
- There is no consideration of eco-friendly design in this plan.

7. Destruction of rural and built heritage

- There is no consideration of heritage issues in the DPA. The word is mentioned only occasionally, again as a tokenistic gesture. The DPA ignores Council's current policy.
- This new development will result in a total loss of the area's traditional cultural rural heritage.
- There is no consideration of the built heritage identified in the Council's Heritage PAR and now incorporated in the Mt Barker Development Plan.
- There is a total loss of Mt Barker's historical identity – the 'cream bowl' has turned into a 'rubbish bin'.
- The view from the historic Mount Barker is completely destroyed forever.
- We strongly oppose the reconsideration of heritage status for some built forms which is indicated in the DPA.

8. Complete destruction of flora and fauna

- There are three nationally endangered species and 25 State threatened species in this area. These are not identified nor are there strategies to save or retain them in the DPA. Again we believe this is a serious flaw in the DPA.
- All native vegetation is at risk from the development.
- Most trees (including significant) are not protected. There is no consideration of this in the DPA so how will the trees be recognised and saved.
- The DPA notes that revegetation occurs elsewhere but it is not clear where this will occur. Perhaps on further agricultural lands which will be designated for housing in 50 years time?
- It is highly likely that any remaining trees will probably die because the landscape will not remain wet for a sufficient period of time due to increased run-off.
- The natural environment of Mt Barker and Nairne is hardly noted in the DPA. There will be ongoing destruction of centuries old eucalypts and the habitats they provide our wildlife because houses have been built too close to these trees or the trees are too close to where a new intersection will be built. We can therefore expect a further decline in our biodiversity.

9. No consideration of land use history (Indigenous peoples)

- This DPA shows absolutely no respect for Indigenous lands – the Peramangk people's land use history is being destroyed. Covering their lands with housing is offensive to the Indigenous people. This is exactly the same as what occurred in Australia in the 18th century and South Australia in 1836.

- What degree of consultation has occurred with the Indigenous communities? Has any respect been shown for their culture or history? We understand there are Indigenous burial sites in this landscape, and acknowledged areas of settlement.
- The land has been used for agricultural land by many generations of farmers and landowners. Let us remain linked to our history and not cover this land with houses.
- This area for new development is one of the last remaining agricultural areas with reliable rainfall.
- The DPA does not recognise the loss of over 1300 hectares of prime agricultural land, once comprising the peak production lands of the state and part of an important food source.
- The land for the projected sprawl is of a high class (moderate/high to moderate) according to PIRSA. PIRSA states:
 - 25% of total agriculture;
 - 85% vegetables;
 - 30% fruit;
 - 40% wine; and
 - 40% dairy/milk from the State comes from the Greater Adelaide Region (PIRSA, 2009).

These are all important percentages. Why risk losing this important food source?

- Why put houses in place of this high value land?
- This area has seen the greatest increase in agricultural growth in last 6 years, where all other regions have been stable (PIRSA presentation, 2009).

10. Insufficient water supply

- There is now 50% less water in the catchment, and considering the last 1500 km of the Murray has no run off, what will we do for water? Where is the water coming from? The DPA has given no consideration of this.
- As the Federal Government is threatening to withhold/delay/reduce their funding for the desalination plant because the State Govt cannot keep to one of its promises - that SA's reliance on the River Murray will be reduced over time we question the State Government's Water For Good policy, which states that SA will continue to take the same out of the Murray for many years. If the State Govt changes this - reduces its pull on the Murray to suit the funding deal - this means the 'Water For Good' policy falls down and the desalination plant plus reduced Murray use will not be able to supply SA's water needs.
- This Association has written to Minister Holloway three times and asked a simple question: Where is the water coming from? As yet it has not received an appropriate or gracious reply with an honest answer. So, where is the water coming from?

11. Inadequate stormwater and waste water management

- Do the current Development Plan requirements alleviate the flooding problems in the District? They don't, and this DPA only adds to an already serious problem in the District. The creeks and several roads flood regularly.
- The treatment of stormwater with extensive housing development occurring, thus creating greater run off, with less soil for absorption will create huge problems for stormwater management. The current practice by developers of removing the valuable top soil greatly increases this problem.

- Existing houses will also be affected by the new stormwater. Why do existing residents have to be affected by these new developments?
- Desertification will result as the landscape is dried out. Current developers are removing topsoil before they construct new houses and the water runs off the clay rapidly and is fed away. There is nothing in the DPA to stop this from continuing to happen.
- We embrace and support the Prime Minister's new Stormwater Management Policy presented to the community the week beginning 26 July 2010.
- The Council's current waste water treatment ponds are at a maximum and Council is concerned about the ponds not complying with EPA regulations.

12. No funding or detailed plans for transport, traffic and road networks

- Roads, footpaths, interchanges, ring routes are all mentioned but not planned or costed in this DPA. This is again, expensive infrastructure which either developers or Council will have to fund.
- The DPA indicates an hourly bus service is acceptable, yet this bus service does not exist in most areas. There is no mention of how existing buses will service an increase of 30,000 residents.
- All vehicular traffic will be channelled from the south (Flaxley Road), right through the new intensive growth area, north to meet a non-existent freeway exit off Bald Hills road, which is (if it existed) NOT the closest exit.
- Freeway travel times and speeds in the DPA are all based on the existing use of the South Eastern Freeway which creates a skew in calculation for an increase of 40,000 plus motor vehicles on the SE Freeway (from Mt Barker, Nairne as well as Murray Bridge).
- There is no additional freeway exchange therefore only one way into and out of town – it is a cul de sac, but a main arterial route for Strathalbyn, Milang, and Clayton residents where growth is also targeted. It will cost \$44 million to build this interchange. Where will the money come from?
- Council identified the ring routes as costing more than \$55 million (excluding land acquisition costs). How will this be funded?
- There will be increased noise and pollution from increasing traffic in the region.
- No parking has been identified in the DPA. There is currently inadequate parking in the Town Centre and this DPA will only exacerbate an already clogged transport network.
- There are no appropriate intersections planned in the DPA. How will traffic intersect at major intersections? Again, who will fund these major infrastructure requirements?
- Mt Barker is a small old South Australian town with narrow roads, no footpaths and minimal infrastructure. These were goat and buggy tracks. You are now trying to build major road networks on these old roads. It is a difficult, extremely expensive task without more destruction of trees and buildings.
- We ask that you consider peak oil issues as reliance on transport increases. This plan indicates that more residents will have to commute to the city to work thus creating increased demand on finite resources.
- There has been no consideration of light rail in the DPA.

- Increased traffic on the freeway and main arterial roads will increase the time that vehicles are on roads thereby increasing pollution and driver frustration. There has been no consideration of using the SE Freeway more strategically.
- Park 'n' Rides have been considered but are not planned in any detail. There are insufficient planned for this large scale development. Interestingly, the Department for Transport, Energy and Infrastructure (DTEI) indicates in a letter to Council that '*DTEI does not support the provision of Park 'n' Ride facilities at Satellite locations such as the Bald Hills Road interchange, the South Eastern District Centre and the South Western District Centre.*'
- We believe a proper, well planned and adequate transport system is required before even thinking about building houses.

13. Omission of adequate employment strategy and projections

- There is absolutely no clear direction about future employment prospects in the DPA.
- It indicates the removal of existing jobs (farming, livestock management, horticulture) to create supposedly new jobs which have not been identified, defined, scoped or planned.
- There is only a very small percentage of zoned industrial land to be developed for new jobs for a huge increase in population. This is clearly a tokenistic gesture to the community.
- By not providing any great employment prospects it will mean that new residents will be forced to travel to the city to work, thereby further clogging our already clogged Freeway and main arterial roads into the City. Of particular note are Glen Osmond, Cross, Greenhill and Portrush Roads.
- The Council's submission to the DPA includes significant analysis of employment issues

14. No plans for community services (health, schools, childcare, library etc)

- There are no plans to accommodate schools, kindergartens or childcare centres. The DPA notes that the community will have to wait for market demand before any are planned or constructed but we believe this is reactive, rather than proactive -as planning should be.
- "*Given the full range of emergency services conveniently located within Mount Barker, the provision of additional services within the new urban area is unlikely to be necessary*" (DPA, Page 71).
- There is an urgent need to improve the current school services for the current population before further growth occurs. There are long waiting lists for most private schools in Mt Barker at present. There is no funding or land detailed for any schools.
- The Library needs to be better resourced for an increased population. It will not cope with large scale increases in population. It has not been upgraded for many years. Again, who will fund this?
- The present Post Office is a total disaster for people to collect their mail. There is nothing in the plan to indicate how this will be alleviated with the increased population. There are only 3 car parks to collect your mail. How can this be suitable for a growing population?
- All health services will need to be increased. There is no indication how this will be planned.
- The DPA indicates '*market forces*' will create demand for services. This is inconsistent with the 30 Year plan which was supposedly developed to guide the thinking for the DPA.

- What consideration has been given to The Adelaide Hills Country Health Services DRAFT 10 Year Local Health Service Plan 2010 – 2019 (see information at pp 4 -6 about the need for future services)?
- What will happen to the current District Hospital and its associated health services? The Adelaide Hills Country Health Services DRAFT 10 Year Local Health Service Plan 2010 – 2019 states *'The current site for the Mt Barker and District Health Services (ie the hospital) may not be the best site to meet the health service needs for the Mt Barker District and Greater Hills Area into the future. Further analysis of this is required before the rapid population growth in the Mt Barker and Strathalbyn areas. Urgent investment is required to improve the patient journey and provide services close to home'* (pp 4 – 5, Executive Summary).

15. Reclassification of bushfire risk

- We do not understand how the high fire danger district can now be reclassified to medium and low risk. Does the removal of farming land and trees mean there will be no further bushfires? Has not the Victorian experience shown this to be a major mistake?
- How does the bushfire risk stop at the roadway or the boundary of the new areas?

16. No plans for recreation, sport and open space areas, culture and arts

- No recreation, sporting or open space areas have been zoned nor clearly identified or planned. All other zones are neighbourhood zones but there are no Public Purpose zones.
- If the Council is forced to sell its parcel of land on Bald Hills and Springs Road to fund infrastructure, there will be no recreation land indicated in the plan.
- There are no details of the open space and natural corridors linkages. These need to be firmly established before any land is released (DPA p4).
- There is absolutely no inclusion of arts and culture requirements for a new community.

17. Emergency services/management

- Many emergency services (Fire, Police, Ambulance and SES) may have difficulty servicing these new growth areas adequately. The DPA does not address these services adequately.
- We strongly disagree with the DPA statement that there is no need for further services.

18. Mental health, increased stress for the local community

- This scale and scope of development will disturb resident's peace and stability. The example currently in place - the corner of Wellington Road and Sims Road - is one roundabout construction but this alone is causing residents to seek medical attention. What will happen to the mental health of affected people?
- Current developments are causing a significant loss of quality of life, increased anxiety, depression, stress and potential suicides. This has been occurring for the past 10 -15 years. Do residents have to put up with this for the next 30 years? Will people be forced to move to another area to have a peaceful existence? People are already moving. We have many examples of people moving to other areas. Why do residents have to move to have a reasonable quality of life?

- There is no compensation, or services to provide support to the resultant mentally ill or depressed.
- This DPA will create future ghettos, with no provision for essential services and public transport. Will this create more vandalism and graffiti with a bored youth? There are no services for the youth. No jobs. Just more of the same boring lifestyles which lead them to lives of crime.

19. Destroying the tourism potential

- The DPA is silent about the loss of tourism land, amenities and dollars. There is no consideration given to the fact that tourists drive through the Hills to see green paddocks, old majestic gum trees and quaint historical cottages. Our current tourist routes will be lost to suburban sprawl.
- The Mt Barker District and the roads between it and its adjacent towns and settlements have many stunning settings. These will all be lost and only Alexandrina and Onkaparinga Councils will have Tourist Drives. Ours will be 'suburb' drives.

20. Risk to Council and ratepayers

- The DPA in its current form creates high level of risks for the Council. Sound financial management has been a key cornerstone of this Council. This DPA puts this financial framework at significant risk as there is insufficient capital (cash reserves or loan facilities) to fund such a large scale development, particularly as there is no indication that the current developer contribution policy will be continued. The Council states *'The fiscal magnitude of the MDPA and its long term duration, the consequent potential changes in Government(s) and the long term financial viability of the developers involved collectively contribute to a process involving significant risk to Council.'* (Council Agenda papers, 2 August 2010, p13).
- Further in the same agenda papers *'Council's discussions with experienced financial business consultants to South Australian local government support the view that Councils involvement in the DPA may well severely challenge its future financial sustainability and while acknowledging the issues requires a more detailed review, as it poses substantial long term viability risks to the Council'* (op cit, p12).
- Further risks identified by Council include: loss of community goodwill and engagement; inadequate supply of land for social infrastructure (60 hectares as a minimum requirement); inadequate employment prospects or opportunities for such a large increase in population; inadequate and unsafe roads creating greater risk for accident and injury to its citizens; environmental and health risks; risks to its sustainability objectives particularly in relation to its waste water and storm water management (op cit, pp 3 – 7).

Summary

This DPA is an extremely vague document. It is simply a document developed to extend the town boundary by rezoning a large portion of prime land with one mass zone. It contains no clear identification of, or funding for infrastructure or service requirements. It is not consistent with the 30 Year Plan for Greater Adelaide, the Council's current Development Plan or its Strategic Plan 2009 - 2019.

The DPA:

- doubles the number of extra people for Mount Barker (up to 30,212 page 24) than the 30 Year Plan's 15,600 (p91 of the 30YP);
- develops far more land than is needed to accommodate 15,600 people;
- includes an electricity calculation for only 4000 homes not the 11,500 in the DPA;
- has no consideration of the extra water coming from the Murray;
- does not include:
 - new water pipes,
 - new roads or footpaths,
 - new sewerage works,
 - extra places in schools,
 - new schools,
 - one extra bus,
 - extra Police, or other emergency services, or
 - additional health services,
- indicates a new freeway interchange is not planned before 2017 and there is no commitment to this,
- the extra 30YP population at Murray Bridge (13,400) not calculated in future freeway loadings,
- includes only 41 hectares of light industrial zoning for jobs for 30,000 people, and
- there is no land set aside for any infrastructure, and no costings or budget for it.

Conclusion

Mr Holloway - we know what you are up to! The developers are controlling this DPA. They are influencing your every move. Why not show some true strength of character and ignore the developers, listen to this community and create a town, as you wish, somewhere entirely new. Dunstan's dream for Monarto could be Holloway's reality. Have you looked at the sustainability of other regional areas eg Lower Murray, Iron Triangle, Monarto, Taillem Bend or other areas where development is requested by communities to stimulate jobs in local areas? Why do you want to put these extra people here when the Mayor of Whyalla wants more people in the Iron Triangle? Why do you want another 560,000 people in South Australia, a place desperately short of water and short of food growing land with a reliable rainfall? And when the magic population number is achieved, exponential unmitigated growth continues? What then- further expansion of the town boundaries?

It would appear that this is the only Ministerial Plan from the 30 Year Plan for Greater Adelaide. Why is this the case for our District? Premier Mike Rann said '*they will now be listening to the people*'. We will see the quality of his listening (and hearing) by how these submissions are treated.

The Government has a Duty of Care to its existing citizens. They are paying their rates and living honest lives, working hard to make ends meet. You think then, that it is suitable to bring in new residents to create adversity for these residents? Where is the fairness of this? What is happening to the Australian way of life? You are destroying the very heart and soul of this community.

SHAME....SHAME....SHAME!

This 19th century approach to urban planning is ludicrous. The population of the world will increase over the next five years and then decline. The growth plans need to consider this and not create ghettos for our communities. We ask that you return to the drawing board and reconsider whether you wish to continue with this approach. We strongly recommend you consider creating an entirely new city in an area more suitable for the type of development envisaged by your developer friends.

We strongly reject this DPA.

YES, of course we wish to register to be heard on August 31 at the public hearing!

Laurence Gellon

Chairperson

Prepared by the Executive of the Mt Barker and District Residents' Association on behalf of its members.

References

ABC Ch 2 News programs 22 June, 2010 and 25 July 2010.

ABC Radio National's Background Briefing programme, 25 July 2010.

The Adelaide Hills Country Health Services DRAFT 10 Year Local Health Service Plan 2010 – 2019, Released for community consultation, June 2010.

Cribb J (2010), *The Coming Famine*, (CSIRO publication in press).

Community Engagement Group Australia (cega) and EconSearch: 2010: *Economic Impacts Associated with Population Growth in the Mt Barker District*, prepared for the District Council of Mt Barker.

Department for Transport, Energy and Infrastructure, *Elford Letter to Council*, 26 July 2010. District Council of Mt Barker, *Social Infrastructure Impacts of the Mt Barker Urban Growth Ministerial Plan Amendment*, August 2010.

District Council of Mt Barker, *Annual Business Plan 2010 – 2011*, 2010

District Council of Mt Barker, *Development Plan (2007)*

District Council of Mt Barker, *Strategic Plan 2009 – 2019*

District Council of Mt Barker, Council Agenda Papers – 2 August 2010

District Council of Mt Barker, *Submission to the Ministerial Mt Barker Urban Growth DPA*, August 2010

Government of South Australia, *30 Year Plan for Greater Adelaide: A Volume of the Planning Strategy*, 2009

Hugo G, Presentation to NRMB Information event, Mt Barker Golf Club, Mt Barker

Mt Barker and District Residents' Association, *Minutes of Special General Meeting to discuss the Mt Barker Urban Growth DPA*, July 25 2010

Parsons Brinckerhoff, *Infrastructure Implications (transport, stormwater and wastewater) of the Ministerial Development Plan Amendment*, 28 July 2010

PIRSA, 2004: Maps of soil quality in the DC of Mt Barker.

PIRSA, 2009: Presentation to NRMB information event, Mt Barker Golf Club, Mt Barker.

Watson C (2010) *The Advertiser*