Sellicks Woodlands and Wetlands Action Network (SWWAN)

Submission to Greater Adelaide Region Plan Review
6th November 2023.

SWWAN was founded in 2020 to oppose greenfield housing developments in the Sellicks Beach area and to advocate that the land instead be conserved for environmental restoration as an essential response to the extinction crisis.

In support of this we present an evidence-based plan for the wider region of the Willunga Basin and Fleurieu Peninsula that addresses the existential threats to South Australia of biodiversity loss and climate change, protects our agricultural industries and addresses the housing crisis. Our plan respects the cultural significance of the land. SWWAN consider the healing of Country as an essential part of reconciliation.

Since the last update of the 30-Year Plan Greater Adelaide Plan (30-Year Plan),
our world has changed significantly and the knowledge of the threats posed to us by biodiversity loss and climate change have expanded greatly. The environment is collapsing because of biodiversity loss and the effects of climate change are being felt across the world. The need for housing is no longer, and hasn't been for some time, on the peri-urban fringe of Adelaide but in sustainable urban infill closer to the city centre with a priority on social housing.

As a significant measure against biodiversity loss in the Mount Lofty Ranges region, SWWAN proposes that the South Australian Government partner with community and stakeholders over the next decade to create the Willunga Basin Coast Conservation Park as part of a larger program over the next two decades to Rewild the Fleurieu and reverse the extinction crisis. We strongly urge the state government to undertake this project for the benefit of all South Australians.

Sincerely,
The SWWAN Committee.

SWWAN'S PROPOSAL FOR A RESILIENT FUTURE

REWILD THE FLEURIEU &
THE WILLUNGA BASIN COAST CONSERVATION PARK

SWWAN propose that in response to the existential threat posed by biodiversity loss to our agricultural industries and jobs, our food security and future, that the Willunga Basin coastline be protected from further urban development and that the Willunga Basin Coast Conservation Park, following the Tjilbruke Dreaming Trail, be created from Maslin's Beach to Sellicks Hill as part of a wider Rewild the Fleurieu project to protect the Willunga Basin food bowl and ensure a productive and resilient Fleurieu. This potentially could also be achieved by extending the McLaren Vale Preservation District to the coast.

We propose the Willunga Basin Coast Conservation Park as a continuous conservation zone protecting the last open space on the metropolitan coastline and the only place where the hills meet the coast. The park will extend South from Maslins Beach between South Road and the coast, wrap around the existing townships of Port Willunga, Aldinga, and Sellicks Beach, buffer the Aldinga Scrub and Washpool Conservation Park, and climb up to a restored eucalyptus grassy woodland that would have once overlooked Sellicks Beach. (Figure 1 next page)

Our vision is that this new conservation park could one day connect north to the Onkaparinga National Park, and south along the Fleurieu Coast through to Cape Jervis as part of a larger Rewild the Fleurieu project. The establishment of the Willunga Basin Coast Conservation Park would create a unique conservation park that would cover several significantly different ecosystems and land types and their transitional zones. The park will contribute to the protection of productive and cultural landscapes and increase biodiversity in the wider Willunga Basin. It will keep the enclosed urban areas cooler, build resilience into our local agriculture industry, create diverse tourism opportunities and jobs in the area and maintain the current residents' quality of life.

By restoring the Willunga Basin coast's native vegetation, we will be contributing to preserving biodiversity in the area and the ecosystems we rely on for food, clean air and water. In doing so, we will not only help restore our environment and save species from extinction, but we will grow our economy, make our community more resilient, healthier, and better prepared for the problems associated with climate change.

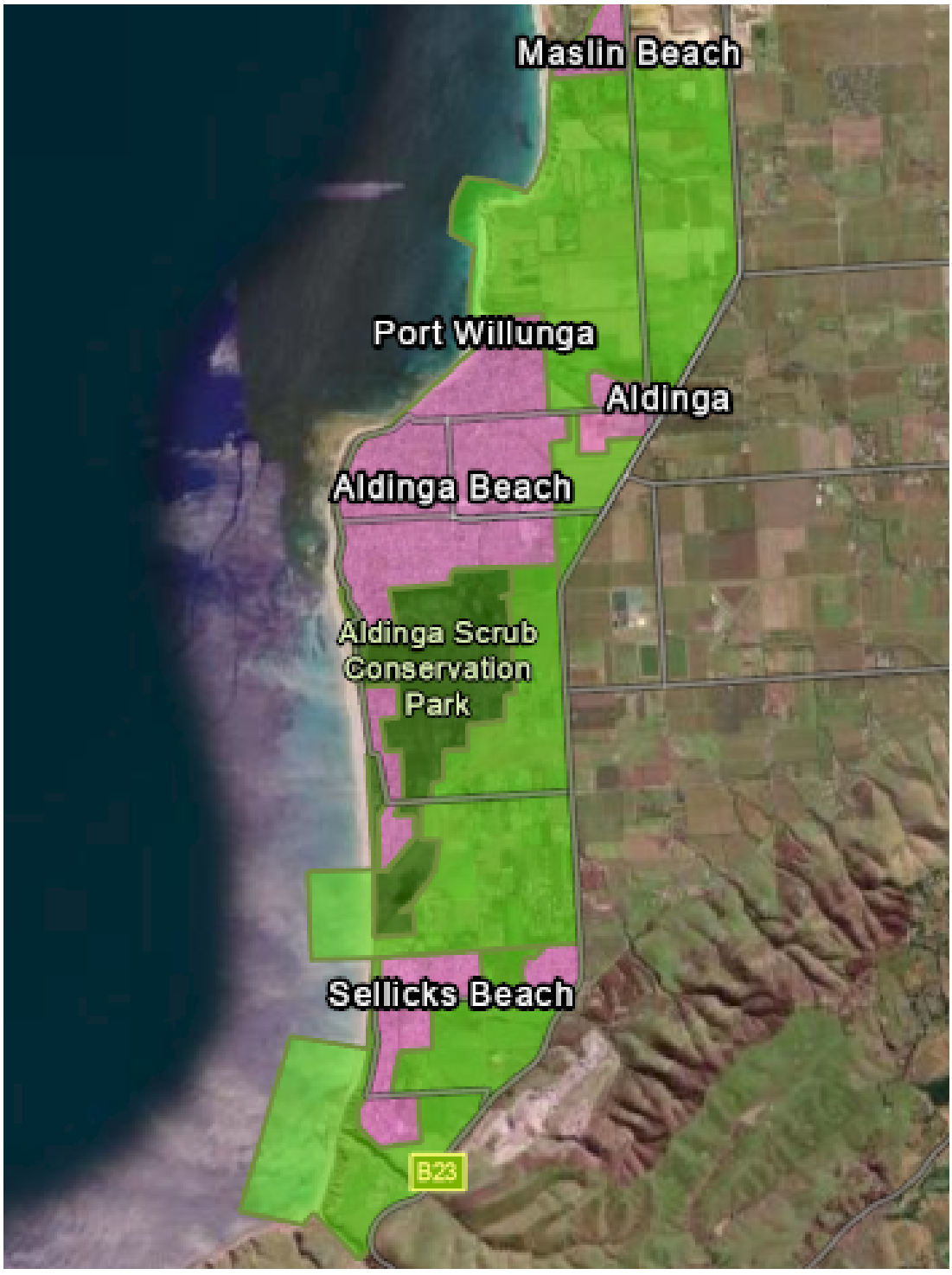


Figure 1. Mud map of the proposed area of the Willunga Basin Coast Conservation Park. Incorporating the townships of Port Willunga, Aldinga, Aldinga Beach and Sellicks Beach, and the Aldinga Scrub and Washpool Conservation Park.

The Issue

BIODIVERSITY LOSS

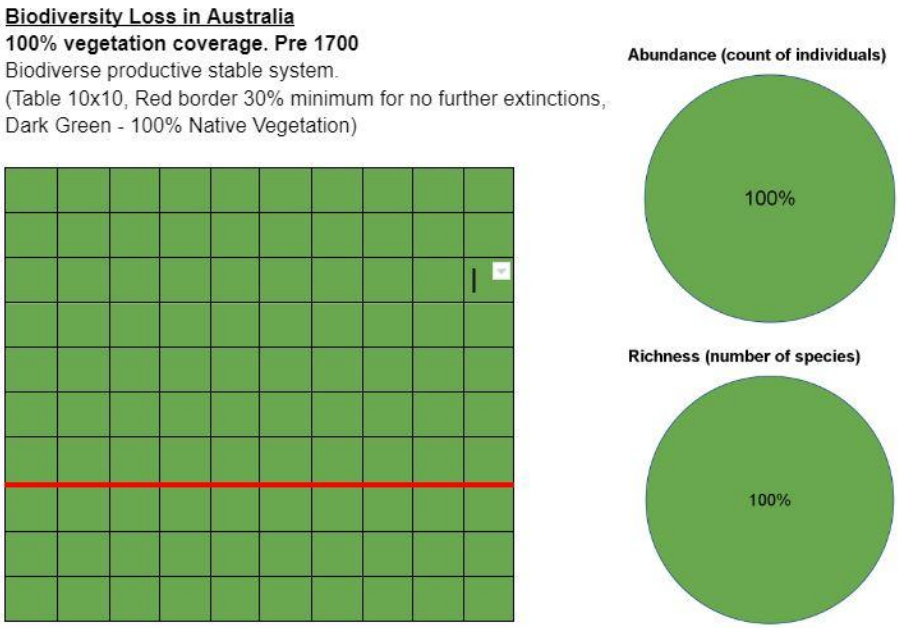
The extinction crisis is the biggest threat to the future of South Australia. The predicted collapse of the environment in 50-80 years time will devastate our agricultural industries, threaten our food security and is irreversible. The evidence for species loss and the threat posed by ecosystem collapse is overwhelming and addressing it must be a priority for all governments.

Biodiversity loss and the extinction crisis are driven by a lack of resources because of centuries of clearing habitat for our cities and farms. Biodiversity loss is commonly confounded with climate change but the key driver of biodiversity loss is the historic clearance of more than 90% of habitat across the arable regions of Australia.

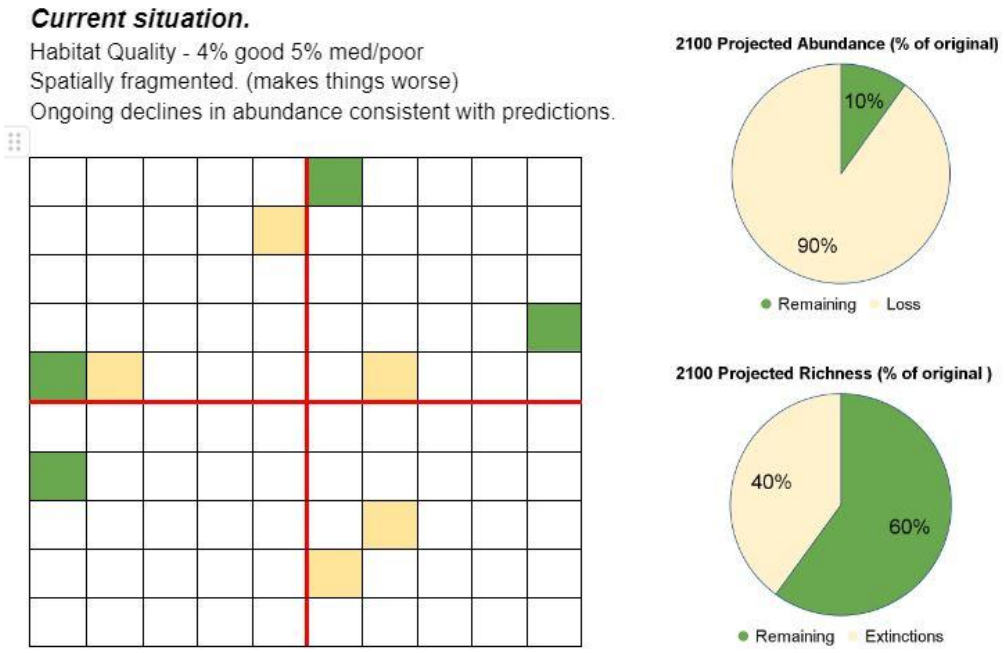
This loss of habitat represents a shortage of food, shelter, hiding places, escape routes, places for mating and raising babies, which over time results in population declines and eventually extinctions. In economic terms we have overspent our natural capital and now owe a significant extinction debt. Climate change will make this worse but solving climate change won't fix these problems.

Figure 2 Aldinga Scrub looking southeast from the dunes lookout.2021.

A quick ecology lesson.



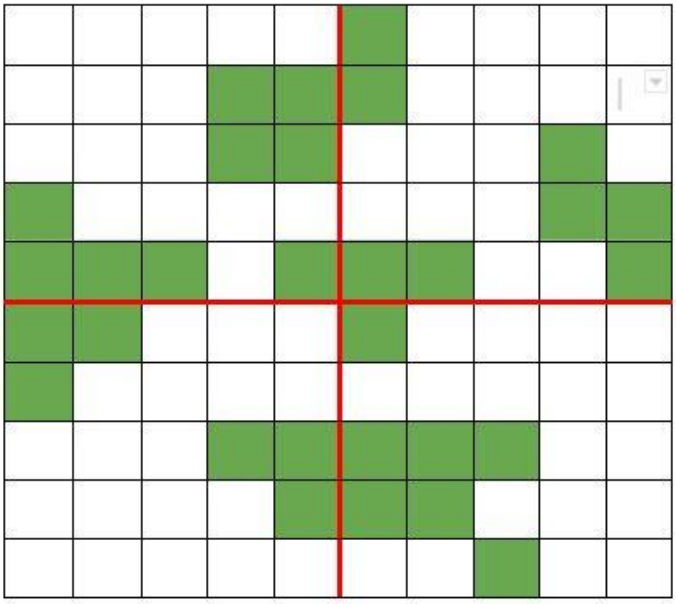
Since colonisation we have cleared approximately 90% of our natural capital and we now owe a significant extinction debt. There is a long temporal delay, 50-80 years at current rates of decline, between the loss of habitat and the decline of faunal populations to meet the new resources level. If allowed to reach this level we will see 30-50% of species go extinct by 2100. This is the extinction debt we owe[1].

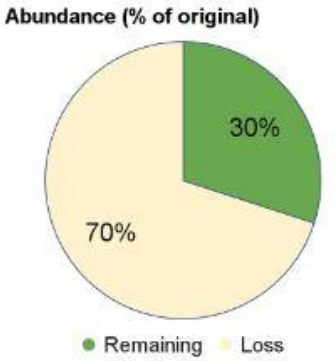


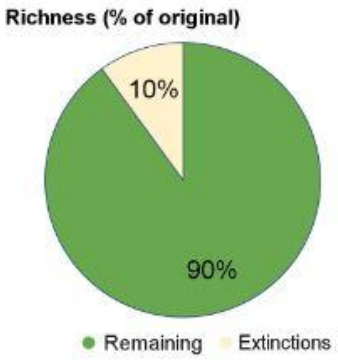
[1] *2017 SA Gov Environment Resources and Development Committee* 53rd Parliament, Environment Resources and Development Committee Completed Enquires Report 78/ Biodiversity.28/03/17

We can pay the debt in extinctions or invest now to rebuild nature before the debt is due.

Goal. Needed to prevent ecosystem collapse.
Greater than 30% contiguous, good quality, heterogeneous habitat.
Achievable in 25-50 years.







The temporal delay means we have a window of opportunity to restore habitat to the 30% minimum required for no further extinctions. The scale of the work required is considerable. Within the Mt Lofty Ranges 150,000 hectares of new restoration are required, or over a century of work at current rates[2]. This can be scaled up to achieve the target in the time frame required of the next 50 years, but we must start now by protecting farmland from greenfield development and prioritising broadscale restoration programs commensurate with the scales required.

The map of the Willunga Basin (next page) shows how only (9%) native vegetation is left and located on the edges of human use. Additionally the habitat is highly fragmented and in poor condition due to invasive weeds. To maintain functioning ecosystems to provide us with food, we need habitat coverage of at least 30% throughout the landscape[3] of contiguous, good quality, diverse habitat. Below this we will continue to see declines and extinctions and be impacted by the effects. Protecting the 10% left is not enough.

[2] *BioR Strategic Plan 2023-2028 From Cleared Lands to Woodlands BioR accessed Aug 2023.*
[3] *UN 30x30; Koalas, parrots, frogs and orchids share our cities. It's key to protect each one's habitat, not just 30% of all land Simon Kilbane, The Conversation, Nov 2023.*

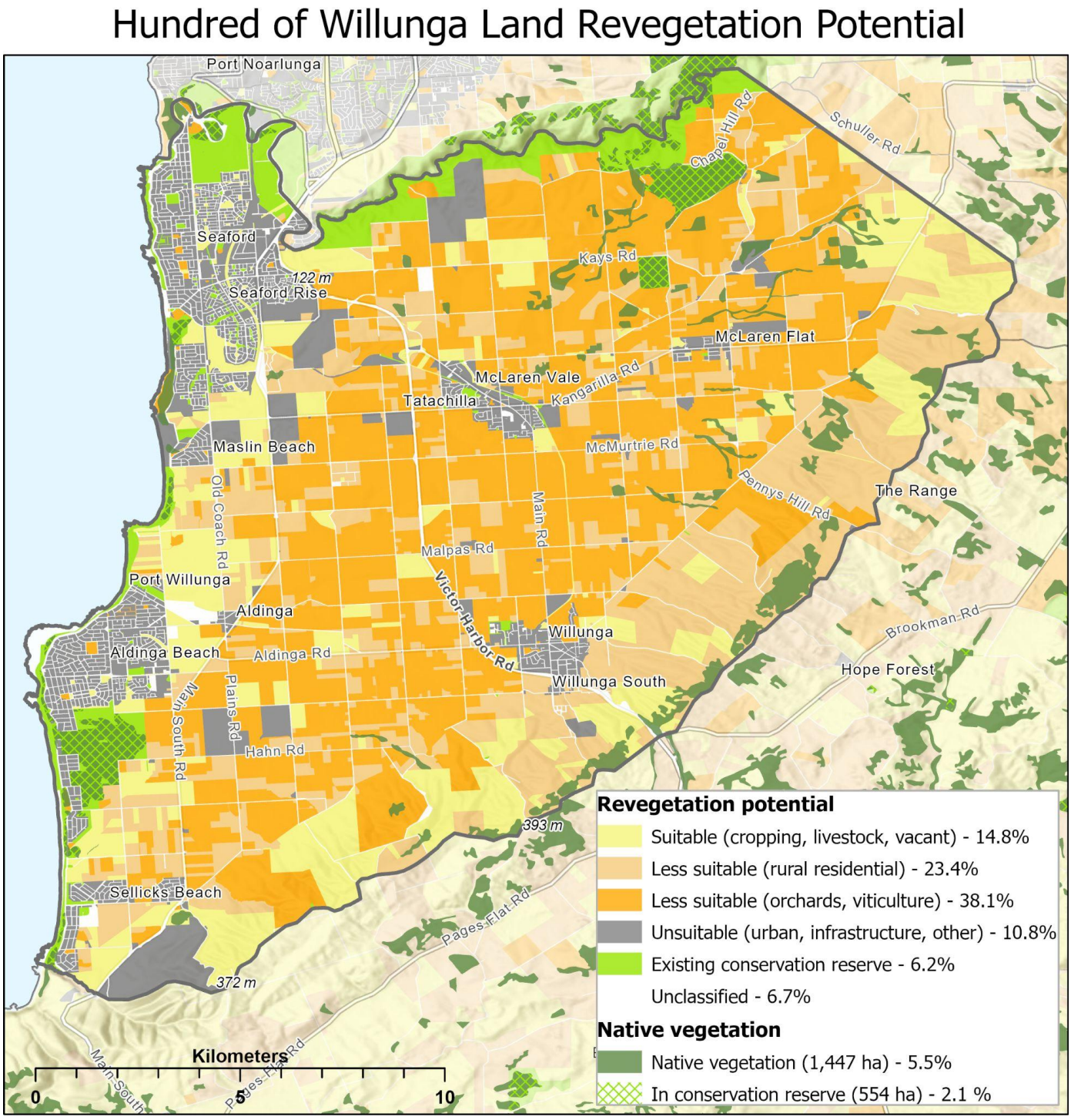


Figure 3. Land use map of the Willunga Basin. I Ahmer, University of Adelaide, Dec 2023 for SWWAN.

Benefits

The prevention of further extinctions by restoring the environment will have widespread benefits in the future beyond this primary goal. These include;

Agriculture and Food Security

Farmers from the largest vineyard to the smallest backyard garden in the Willunga Basin will benefit from the restoration of a coastal vegetation buffer and the ecosystem services it will provide. By protecting biodiversity, we will ensure our agricultural community is resilient and better prepared for the future. The most obvious benefit to farmers is the protection of pollination services.

Nearly three quarters of all major crops, representing a third of the world's food supply, are dependent on pollinators[4]. For some crops, such as watermelon, almonds, apricots and cherries, pollinators are essential, others, like strawberries, tomatoes, oranges and many oil crops, will be adversely affected in quality and quantity[5]. Native wildlife also provide important pest control services. A study by R Paisley (2017) from Charles Sturt University showed that the presence of native vegetation close to agriculture has a net positive effect with a 10-20% premium in productivity over sites without nearby vegetation[6].

A loss of ecosystem services will be calamitous for the agricultural sector particularly society in general. To ensure the resilience of our food supply, our agricultural economy and the jobs that go with it, we must treat the environment as the irreplaceable asset it is and act now to repair it before it's too late.

Economic

While the economic gains from urban construction will quickly pass, the jobs and indirect stimulus for the local economy created by undertaking a generational restoration project of this size will last decades. Every worker becomes a customer when they knock off.

Aside from the direct economic stimulus of the restoration work, the creation of a conservation park along the Willunga Basin coast will provide long term benefits to many other industries, particularly tourism and retail. The benefits to local agriculture will be substantial through ensuring the resilience of the industry to continue operating, employing people, and providing a

---

[4] *Ecosystem collapse 'inevitable' unless wildlife losses reversed | Biodiversity | The Guardian* *D. Carrington 25.2.2023*

[5] *H Ritchie 2021. How much of the world's food production is dependent on pollinators?*

[6] *Peisley, R. (2017). The benefits and costs of bird activity in agroecosystems. [Doctoral Thesis, Charles Sturt University]. Charles Sturt University.*

great product. Tourism will be a huge winner from restoring the environment and the overall economic stimulus will in turn create more jobs in the service, retail and other industries.

Community Health

The existing communities of the Willunga Basin will benefit from the cooling effect of the trees, reduced pollution, and most importantly, reduced risk of heat related health problems associated with urban heat in the future, which is recognised as a significant health issue. The value of nature to the economy is currently estimated in the $100s of millions in avoided healthcare costs[7]. This will be even more important in the coming decades, and it is imperative we act now to make our communities climate ready communities to avoid the associated social and financial costs[8].

Cultural Values

The area is on the lands of the Kaurna nation and the Tjilbruke Dreaming Trail passes through the entire area from North to South. This Dreaming story is a very significant story in Kaurna culture and there are a number of significant cultural sites in the area. The creation of the Willunga Basin Coast Conservation Park is an opportunity to continue reconciliation of our history through restoring Country.

Tourism

Imagine if instead of Lonely Planet making Kangaroo Island the 2nd best place to visit that it was the whole Mount Lofty Ranges. In a generation it could be. The creation of a new conservation park on Adelaide's southern metropolitan coast linking to the parks of the Fleurieu will be a massive boost to tourism state-wide and a valuable diversification of the local market heavily dependent on the wine industry. Hiking, birdwatching, and other outdoor activities will create jobs and economic activity both directly and indirectly. As an example of the economic opportunities available, more people went bird watching in Australia than visited the Great Barrier Reef in 2019[9] and in the United States birdwatching is worth $41billion annually[10].

Education and Research

Restoring the 90 hectares of land between Aldinga Payinthi College and Aldinga Beach Road, currently under cropping and previously earmarked for housing and infrastructure, would be a

---

[7] SA outdoor economy Marsdon-Jacon 2020 Avoided Healthcare costs p2

[8] WHO Climate Change and Health Fact Sheet

[9] Courier Mail bird-watching-is-taking-flight

[10] Daily Beast Withrow (2019); Schwoerer T, Dawson NG (2022) Small sight—Big might: Economic impact of bird tourism shows opportunities for rural communities and biodiversity conservation. PLoS ONE 17(7): e0268594. https://doi.org/10.1371/journal.pone.0268594

unique long term environmental educational opportunity for the new high school. Students from R-12 could be involved in all aspects of restoration, preparing many for careers in environmental science and all gaining a greater appreciation for our natural environment.

The need for greater research into understanding ecological restoration is constantly cited in academic papers on the subject. The large scale of this proposal in general and its proximity to metropolitan Adelaide will provide researchers from our universities and around the world with a unique study site to further restoration science and help save the world.

Other issues

There are a number of other issues to be considered in this discussion aside from the threat of biodiversity loss which we address here. We must consider the declaration of the Climate Emergency and what measures are needed to protect our communities from the health risks of climate change, particularly urban heat. What is the cause of the housing and rental crisis and what are the best solutions? We also consider landholders rights and propose options to cover a variety of scenarios as well as the question of anticipated returns on investment for developers and land bankers.

CLIMATE CHANGE

The South Australian Government has declared a “Climate Emergency[11] in response to the global need for action. In the ‘State of the Climate 2022’[12] Report, the Bureau of Meteorology (BOM) stated that Australia’s climate has warmed by an average of 1.47 ± 0.24 °C since national records began in 1910. The International Panel on Climate Change (IPCC)[13] warned us that even if all countries meet current emission reduction pledges, the world is still on track to exceed 2℃ of warming.

While much of the discussion on how to deal with the climate crisis centres on the environment and economics, the biggest threat to individuals and communities are the health risks associated with a warming planet. Climate change poses risks to health through increased risk of heat related health issues, increased risk to pollution-related illnesses and mental health issues[14]. There is the risk to the lives of people through catastrophic weather events such as the

[11] South Australian Climate Emergency Declaration
[12] State of the Climate 2022 BOM
[13] IPCC Report on Climate Change
[14] WHO Climate Change and Health Fact Sheet

Black Summer bushfires and the recent floods, the increased risk of disease and the loss of food and water security[15].

Restoring the natural environment is one of the best ways to act on climate change. Plants draw down carbon from the atmosphere and the restoration of natural environments will keep our communities cooler and reduce the health problems associated with climate change. Aside from being essential to the ongoing viability of agriculture, native vegetation will build resilience into these industries already experiencing declines in productivity from a warming planet. In recognition of this, all levels of government have acknowledged the need to plan for a changing climate, and have policies and initiatives in place to help prepare our communities. We have a responsibility to prioritise these initiatives in the Greater Adelaide Regional Plan..

HOUSING CRISIS

Outdated urban expansion plans do not address the causes of the housing crisis, the rapidly changing needs of our modern world nor the needs of the future. Continued urban expansion will limit our ability to restore the environment to the minimum levels needed around our agricultural areas. The housing crisis is not founded in the need for new homes, it is a lack of affordable long term rentals that is driving the exponential rise in homelessness.

Holidays or Homes

The effect on supply of the short-term rental and holiday market as it has grown over the last decade is often overlooked in housing discussions. Table 3 compares the number of vacant properties and those listed on AirBnB[1617]. The figures show that over two thirds of vacant houses in the Greater Adelaide area are reserved for holidays instead of homes. In Aldinga, where the rental crisis is being felt acutely, the ratio of Airbnb to available rentals is over 9 to1.

Table 1 Comparison of advertised rental properties examining the impact of short term rentals in Aldinga SA@, the City of Onkaparinga and Greater Adelaide.

Vacant Dwellings (March 2023)	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Rented properties	1,509	15,402	152,198
Vacant Rentals	24	258	1,309
Air BnB Listed Dwellings	252	564	2,972
Total Vacant Dwellings (Lng+AirBnB)	276	822	4,281
AIrbNB % (AirBnB/Total Vacant Dwellings)	91.3%	68.6%	69.4%

[15] *WHO Climate Change and Health Fact Sheet*

[16] *RealEstate.com.au – Search for vacant rentals 29/07/23*

[17] *Inside AirBnB, www.insideairbnb.com , data provided by Liss Ralston, Inside AirBnB, June 26 2023*

The government's plan to address the housing crisis by building more houses is targeted at the wrong sector of the market. Our housing crisis is due to a shortage of rental homes and this is where the government should act. While incorporating more social and affordable housing into future developments will help in the future, families cannot live in their cars for years waiting. Encouraging landlords to switch to long-term leases as a priority will reduce the number of families in difficulty right now.

Short-term rental advocates will argue as to the economic benefits brought by the service they provide. The counter argument to this is to consider an equivalent number of families living in these homes contributing not just economically but becoming part of these communities. The economic benefits would also be felt in a reduction in demand for crisis services and other social support services associated with the rental crisis we are currently experiencing. There would also be a reciprocal benefit to hotel and motel operators throughout Greater Adelaide.

The desire of landlords for greater financial returns has been the main driver of the switch from long-term to short-term rentals over the last decade. To reverse the rental housing crisis, it is important to address the financial incentive directly. Here are a number of ways that this could be done.

Council Rates: (both together)

- Increase council rates of short-term rentals to commercial hotel rates. Rates should be set on the use of the building, not its shape.
- Discount rates for landlords offering long-term leases.
    - e.g., 1 year - 10% off, 2 years - 15% off, 3 years – 20% off.

State:

- Set limits on the number of days a property can be used for short-term rentals.
- Consider a land tax to replace stamp duty to increase the ongoing costs on vacant properties.
- Increase safety compliance on short-term rentals to commercial hotel standards. Safety should be based on use, not the shape of the building.

<u>How many houses?</u>

The most recent population projections to 2051 say that at the highest population growth scenarios Greater Adelaide’s population could grow by 672,000 people and require 300,000

new homes by 2051. This growth is unexpected though and the expected growth pathway is for the medium growth scenario of 489,000 people and a need for 218,000 new dwellings[18].

Between 2016 and 2021 South Australia had built 52,000 dwellings and the population increased by 79,000[1920]. This results in approximately 17,000 homes more than required than in the highest population high growth models. Plan SA states on its website there are 139,000[21] homes already approved, these are enough to cover the highest population growth to 2036 at an occupancy rate of 2.24 people per dwelling. (Note: This figure used by the government is considerably lower than the 2021 census which puts the figure at 2.4)[22].

In the most likely growth scenario of medium population growth these already approved homes are enough to cover population growth past 2041 and only a further 79,000 dwellings are required to house population growth past 2051 (Figure 4, next page). This can easily be achieved through urban infill and strategic infill over the next 30 years.There is no need for greenfield development.

This analysis shows that the release of new land for development at Sellicks Beach, Aldinga and Hackham is not necessary as there is already enough development in the pipeline to employ builders for the next 14 years and cover expected population growth beyond 2041 without resorting to greenfield development. On the other hand it is imperative that we begin work on restoring the environment as soon as possible given the scale of the problem and the time forests take to mature.

The GARP discussion paper correctly identifies urban infill, strategic infill and urban corridor development as areas where significant opportunity for housing exists. The numbers expected to be achieved through these measures in the future is not accounted for in the GARP discussion paper but will contribute to increasing the housing supply with greater choice, density and amenities than greenfield housing and at a lower cost to the government.

As dwelling construction has been outpacing population growth requirements since 2016 and will continue to do so even under the highest growth projections, the housing crisis is not a result of a lack of new housing supply. This supports our conclusions that short term rentals affecting long term rental availability is the real cause of the housing crisis.

---

[18] *Population projections | PlanSA accessed Sept 2023*
[19] *ABS Building Activity South Australia accessed Sept 2023*
[20] *Recent population change | PlanSA accessed Sept 2023*
[21] *Plan SA Residential-land-release-and-rezoning accessed Sept 2023*
[22] *2021 Adelaide, Census All persons QuickStats | Australian Bureau of Statistics accessed Sept 2023*

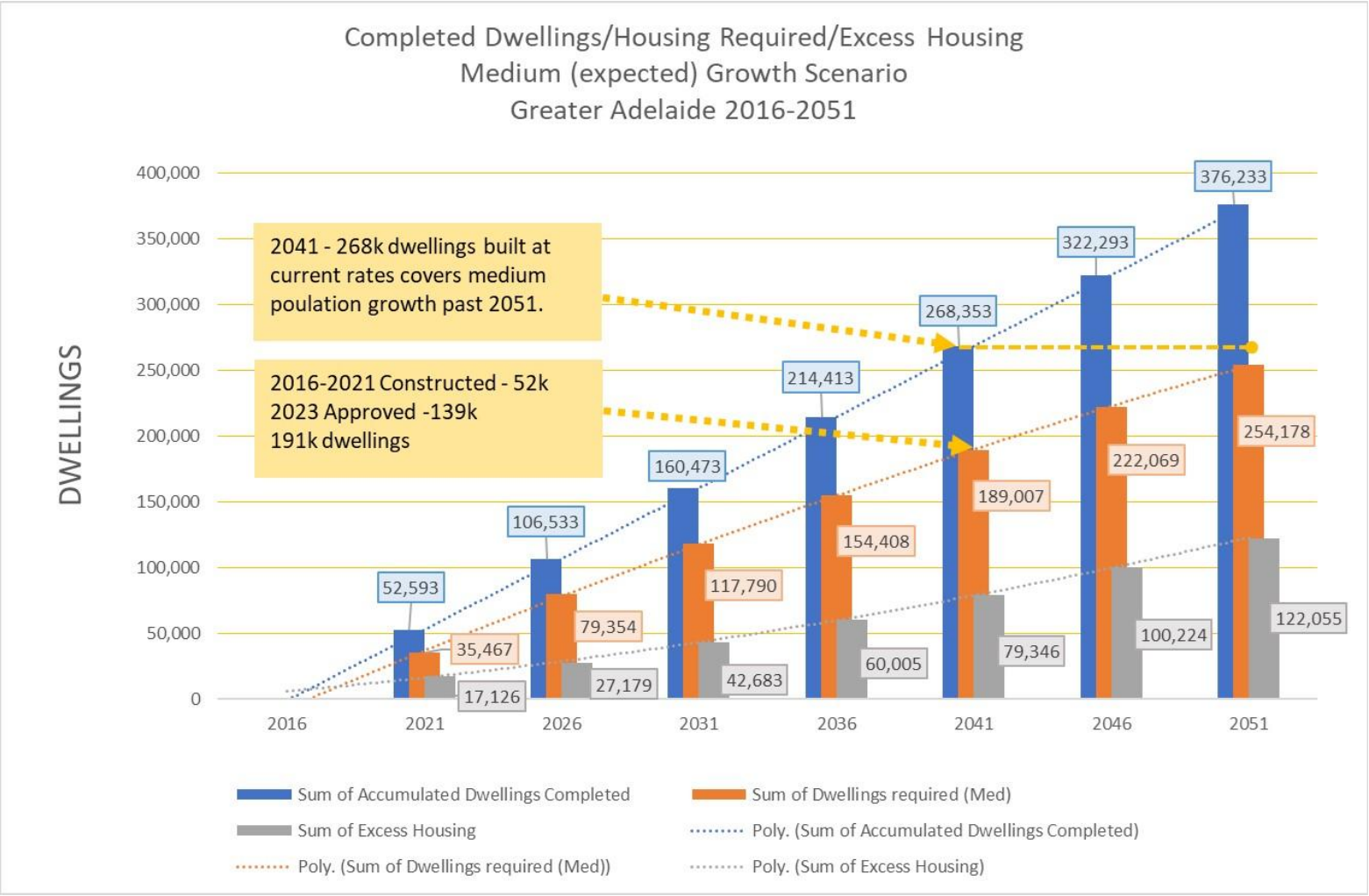


Figure 4. Chart showing data from 2016-2051 of completed dwellings and projected dwelling completions (blue), actual and expected population growth of Greater Adelaide expressed as the number of dwellings required at 2.24 persons per dwelling (orange) and excess houses (grey) as a result of construction outpacing population growth. Data uses Plan SA Population growth figures and ABS Construction statistics 2016-2051. Dwelling construction per year was set at 10,788, the average for the period 2016-2021.

Urban infill

The latest urban development policy research shows that the most beneficial new housing for South Australia will come from medium density infill[23], in established suburbs with infrastructure capacity[24], with a priority on social housing linked to services and infrastructure[25]. This is where we should be prioritising our housing plans. In addition to plans for increased urban infill, strategic infill and urban corridor development, opportunity for further densification of suburbs will come as Adelaide's population becomes older and downsizes large homes in the low density areas.

Greenfield housing is more expensive to society. A literature review and a case study of major development sites in Bowden and Playford Council by Cathryn Hamilton and Jon Kellett (2017)[26] found the costs associated with infrastructure provision to the bowden infill development site was one third the cost of Playford Councils greenfield sites.

Another study, Design Perth[27], made similar findings and additionally provided estimates of the extra transport costs due to longer commute times, extra car ownership and use, and parking costs that fall on individual householders and the broader economic costs to the environment, health and productivity of greenfield housing. These all showed a significant greater ongoing cost for individuals and society associated with greenfield housing when compared to infill.

Despite these findings there is resistance on the part of the development industry to follow current urban growth policy. Hamilton and Kellett (2017) suggest there is some evidence that the developer's construction costs can be higher in infill situations, and hence lower profits, which may explain this. We ask that the government show leadership and plan for our communities future rather than the current plans which put developers retirements first.

[23] Planning to Prosper | Urbis p71
[24] Cathryn Hamilton & Jon Kellett (2017) Cost comparison of infrastructure on greenfield and infill sites, Urban Policy and Research, 35:3, 248-260, DOI: 10.1080/08111146.2016.1274257 p259
[25] ABC News Jul 2022 South Australian Public Housing Shortage
[26] Cathryn Hamilton & Jon Kellett (2017) Cost comparison of infrastructure on greenfield and infill sites, Urban Policy and Research, 35:3, 248-260, DOI: 10.1080/08111146.2016.1274257 p258
[27] Design Perth 2017 p51

LAND OWNERSHIP AND STAKEHOLDER ENGAGEMENT

The land proposed for the Willunga Basin Coast Conservation Park is owned by government, private owners, businesses and investment companies. SWWAN is proposing several options for collaboration between all stakeholders to facilitate the creation of the park.

We propose that all government owned land be transferred to the Department of Environment and restoration work begun immediately. Another option for government owned land is for ownership to be transferred to the Kaurna Nation.

Where land is suitable for restoration but owned privately, options could include, but are not limited to:

1. Sale – The land is bought outright by the government for a fair price and transferred to the Department of Environment as custodian of the land.
2. Sale with option to stay – Owners sell the land to the government for a lesser amount and are given an ongoing paid role in the restoration of the land. This will allow owners who live on the land to stay on their property and be a part of the project. [a]
3. Partnership – Partner with Government or third-party organisation to remain in possession of the land and undertake the restoration works themselves. [a] [b]
4. No immediate restoration – This option is particularly applicable for land currently used for vineyards and orchards where owners may want to continue to operate their businesses while the park is built around them. [b]

[a] In options 2 & 3 training and certification in Conservation and Environmental Management could be offered in some form.

[b] In options 3 & 4, though the owners retain ownership, the only option for eventual sale is to the government for the conservation park.

LAND VALUE and INVESTMENT

All investments come with risk. Sometimes it is high, sometimes low, but there is always risk involved in speculation. Speculators have invested in the land along the Willunga Coast, and in particular around Sellicks Beach and Aldinga, for decades in the hope of profiting from the area's eventual urban development. Unfortunately, during the last several decades, the world has changed, and so too has society's needs for the future.

The need for restoration and action on biodiversity loss is paramount and must take priority over unnecessary development for the sake of future communities. The housing needs projected last century, even last decade, that these investors banked on are no longer here (if they ever were)

and are now closer to the city. Unfortunately for these investors the risk has been realised. The situation has changed and a changing world and the greater need for the land, restoring biodiversity, should preclude any further greenfield development in the Willunga Basin..

Although the expected profits associated with securing the land for development will not be realised, landowners have many options to secure a fair return. Sale to the government for establishment of the conservation park will be at a fair price. Options to stay can come with returns from Carbon Credits and other income opportunities. The only option no longer on the table is urban development.

THE COST

We have not costed our proposal for the Willunga Basin Coast Conservation Park or the wider Rewild the Fleurieu proposal because whatever the cost will be to restore the environment, it will be less than the cost of losing everything if we don't act on a big enough scale, in enough time or if we don't act at all.
Our proposal is ambitious, but we are only asking for what is needed.

Conclusion

SWWAN's proposal to prioritise ecological restoration in the WIllunga Basin provides Governments at local, State and Federal levels an opportunity to create a future-ready, sustainable community and an opportunity to demonstrate their environmental and climate credentials to Australia and the rest of the world. Our evidence-based proposal offers a major contribution to ensuring no further extinctions in South Australia and protecting our future food security. Our plan also addresses some of the health and economic problems associated with climate change that our communities will face. The creation of the Willunga Basin Coast Conservation Park will protect and restore the Tjilbruke Dreaming Trail which is of significant cultural importance to the Kaurna Nation and will enhance the quality of life of all current and future residents.

For the future of the Willunga Basin and South Australia, the Sellicks Woodlands and Wetlands Action Network, on the behalf of all South Australians, urges the Government of South Australia to adopt SWWANs proposals to create the Willunga Basin Coast Conservation Park and Rewild the Fleurieu to restore biodiversity as part of the new Greater Adelaide Regional Plan.

Sellicks Woodlands and Wetlands Action Network

Sellicks Beach SA 5174

www.sellickswoodlands.au

Email: sellickswoodlands@gmail.com

SWWAN Coordinator and Author

Matt Farrell