
From: Slocombe, Jennifer (DPTI)
Sent: Friday, 3 August 2018 1:05 PM
To: DPTI:Planning Engagement
Cc: Waltho, Matthew (DPTI)
Subject: Feedback on State Planning policies

Hello Sarah,
Congratulations to you and your team on pulling together the Draft SPPs. It's a really good document. My colleague Matt and I have reviewed the policies and would like to make a few suggestions. Please don't hesitate to get in touch if you'd like to discuss any of our comments.

General

Suggest broadening out the Legislation and Instruments sections to include key Govt strategies/policies where relevant, eg SA Climate Change Strategy 2015-50, State WSUD policy

Policy 1 – Integrated Planning

- Policy 1.7 – suggest this policy be re-worded to say '*..encourage use of public transport and active transport options such as walking and cycling.*' as public transport is another mode not an active transport option.

Policy 2 – Design Quality

- Policy 2.4 – design advice considered just for complex developments? Perhaps 'significant' developments would be more appropriate.

Policy 3 – Adaptive Reuse

- The policy objective "*adaptive reuse of existing buildings accommodates new and diverse uses*" is considered too narrow in its definition and reads more of a statement than an objective. There are documented economic, social and environmental benefits to adaptive reuse.
- On that point, none of the policies refer to the related embodied carbon benefits in the adaptive reuse of existing buildings and structures as well as the associated waste minimisation benefits.
- The policies do not address the nuances or categories of adaptive reuse and the opportunities so they are appropriate to their context e.g. total refurbishment including base building, façade replacement (aesthetic and thermal functions), internal fit out etc.

Policy 4 – Biodiversity

- Policy 4.2 – suggest modifying as follows: "*Minimise impacts to, and where possible enhance, biodiversity in accordance with the mitigation hierarchy...*"
- Suggest an additional policy along the following lines: "*Promote improved biodiversity in our urban areas by facilitating the provision of green infrastructure and WSUD on private land, transport corridors and public open space.*"

Policy 5 - Climate Change

- The objective does not address the key issue of by how much emissions need to be reduced by, over what time frame and why.
- Policy 5.5 – The policy should go further to 'facilitate industry in developing green/smart technologies, materials and processes that support and drive the transition to a low carbon economy'. i.e. it is not just about reducing reliance on carbon based energy supplies (assuming this is referring to fossil fuels) but dealing with all levels of the energy hierarchy, not just generation.
- There are policies that deal with building and public realm, however there are no policies that deal with resilience of critical infrastructure such as road and rail as part of movement and connectivity. Could modify Policy 5.3 to include infrastructure.

Policy 6 - Housing Supply and Diversity

- There is a clear omission from the suite of policies regarding operational affordability, linked to thermal performance of housing. This links to issues including fuel poverty, energy supply, general poverty, pressures on the health system etc. This policy is important because it is as much about providing housing that is comfortable and affordable to live in as it is about clear signalling to industry and supply chains around design, materials etc.

Policy 11 – Strategic Transport Infrastructure

- Policy 11.10 mentions the role of emerging technology, however, I would encourage a specific policy which explores the role of technology, whether app based real time information (e.g. addinsight)/ digital wayfinding/ , in empowering individuals to make informed choices on how and when they travel as well as the role of evolving technology in operation and management of networks, maintenance etc.

Policy 12 – Energy

- Suggest rewording Policy 12.1 as it does not currently read well. Would suggest wording along the lines of ‘support the development of energy assets and infrastructure which are planned and managed so as to minimise their impact on surrounding land uses, the natural and built environment and the amenity of regional communities.
- Suggest deleting the second part of Policy 12.5 relating to amenity, as this is better addressed in Policy 12.1.

Policy 13 – Coastal Environment

Suggest some recognition of the huge carbon sequestration potential of coastal ecosystems (much more effective than terrestrial ecosystems) – possibly link with Blue Carbon strategy being prepared by DEW.

Policy 14 – Water Security and Quality

- I’m not sure the objective fits the policy and goes far enough in its definition, i.e. it is also about demand management as well as protecting supply.
- Policy 14.3 could be more specific in highlighting the consequences of land use policy on overall imperviousness of our urban areas, eg: *“Provide for infrastructure and land use policy that aims to decrease flood risk and improve water quality and urban amenity, recognising the implications of development on imperviousness and ensuing runoff volumes and quality”.*

Policy 15 – Natural Hazards

- Policy 15.5 – It may not always be practical to protect key coastal areas. What is meant by protect? A more suitable term may be to manage the impacts of SL rise and the other impacts on key coastal areas. It is possible that a management strategy may include managed retreat of certain coastal areas over a long planning time frame. Policy 13.2 and 13.4 of Coastal Environment hints at the potential role of managed retreat.
- Policy 15.4 – It is good to see the green infrastructure is being referred to, however WSUD also has a key role in mitigating through design. WSUD can incorporate green and blue infrastructure measures.
- Policy 15.3 – Is it feasible to locate critical infrastructure in areas that are not exposed to risk from natural hazards? Everywhere is potentially at risk from a natural hazard at some point. As well as the selection of an appropriate location through options analysis and planning, it is the design of critical infrastructure that protects it from the likelihood of being impacted and the degree to which it is impacted. The location of critical infrastructure is sometimes defaulted and therefore a non-negotiable. Policy 2- Design Quality, Principles of Good Design recognises these points *“Good design is contextual because it responds to the surrounding built and natural environment...”*

Policy 16 – Emissions and Hazardous activities

- Suggest rewording the following statement as follows:
Land use interface risks can be avoided or mitigated through ensuring:
 - *appropriate separation between emission sources and/or hazardous activities and sensitive land uses;*
 - *use of architectural treatments and/or barriers to mitigate the impact of emissions on sensitive land uses;*
 - *suitably zoned land with required infrastructure is available for a range of industrial and infrastructure uses.*

- Policy 16.1c – suggest this is broadened to include infrastructure, ie “*Incorporating engineering controls into building and infrastructure design where emissions or impacts are unavoidable*”. Noise barriers can be used to protect sensitive receivers from transport noise emissions and are often preferable to building modifications (as they also protect outdoor living spaces).

Thanks,

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