

From: [Cooper, Benjamin \(Housing\)](#)
To: [DPTI:Planning Engagement](#); [Elding, Sarah \(DPTI\)](#)
Cc: [Allen, Anita \(DPTI\)](#); [Hallsworth, Belinda \(Housing\)](#)
Subject: SA Housing Authority SPP Submission
Date: Friday, 7 September 2018 11:00:48 AM
Attachments: [image001.wmz](#)
[image002.png](#)
[SA Housing Authority SPP Submission FINAL.docx](#)
[image004.png](#)

Hi Sarah

The SA Housing Authority has reviewed the draft State Planning Policies and prepared a submission (attached).

We have suggested a number of policy and content inclusions and proposed a reorganisation of the SPP 6: Housing Supply and Diversity Sub Polices (based upon a review of the interpreted intent and theme of each sub policy)

In particular, we have reorganised the Affordable Housing policy and incorporated wording on the 15%, agreements, incentives and financial schemes, which are proposed to be explored in the People and Neighbourhoods Discussion Paper and are essential for the delivery of AH going forward.

If you have any questions etc, please let me know. More than happy to discuss and contribute as always.

Cheers, Ben

Benjamin Cooper
Project Manager
Housing Strategy

P: [REDACTED] | M: [REDACTED] | E: [REDACTED]

Riverside Centre, North Terrace
Adelaide SA 5000

Visit Housing SA at: www.sa.gov.au/housing

This e-mail may contain confidential information, which also may be legally privileged. Only the intended recipient(s) may access, use, distribute or copy this e-mail. If this e-mail is received in error, please inform the sender by return e-mail and delete the original. If there are doubts about the validity of this message, please contact the sender by telephone. It is the recipient's responsibility to check the e-mail and any attached files for viruses.

Act for a sustainable future: only print if needed.

SA HOUSING AUTHORITY SUBMISSION FOR THE STATE PLANNING POLICIES

General Comments on the State Planning Policies

If the policies are to be read and interpreted in conjunction with the other State Planning Policies (SSPs), there is an opportunity to refine and focus each of the SPPs and the respective sub-policies. For example, and this is subject to the final presentation of the SPPs, the section in the *Non-Statutory Guidance Notes* labelled *Related SPPs* can be upgraded to *Linked SPPs*. Another option might be to link policies across the whole SPP document. For example, Policy 6.2 in the Housing Supply and Diversity section is heavily linked to SPP 1 Integrated Planning.

Part 4: Out Targets

SA Housing Authority encourages targets on increasing general affordability and affordable housing. Could / should the 15% Affordable Housing in significant developments be included?

State Planning Policies

SPP 1 Integrated Planning

Policy 5 and Policy 6 is supported.

Policy 8: Suggest inserting transport nodes and corridors as a location for high-rise. Suggest this Policy should include density as well as height.

SPP 2 Design Quality

Principles of Good Design: Suggest good design is inclusive because it creates places *and areas* for everyone to use and enjoy by optimising social opportunity and equitable access.

SPP 3 Adaptive Reuse

Policy 5 is supported.

SPP 6 Housing Supply and Diversity

The Housing Supply and Diversity SPPs should refer to housing that is culturally appropriate, including reference to regional and remote communities for Aboriginal and Torres Strait Islanders. This has been incorporated through 'social and cultural needs' in SAHA's Suggested Policy Wording for Policy 1. Alternatively, this could be standalone policy in this section. A sentence to provide context to this should also be included in the SPP 6 introduction statement on page 36.

The Housing Supply and Diversity SPP's should include a standalone policy that "Promote / Encourage housing that is well designed, orientated to maximise the benefits of the local climate and solar access and incorporate environmentally sustainable design features to support healthy, sustainable and affordable living". This would be linked to SPP 5: Climate Change.

Current Policy	Interpreted intent or theme of the policy	Suggested SAHA Policy Wording	Link
1. Enable the provision of a well-designed, diverse and affordable housing supply that responds to population growth and targets, and the evolving demographics and lifestyle needs of our current and future communities.	<u>Overall Population and Demographics (Supply and Demand)</u> - This is essentially a housing supply and demand policy. - 'Needs' are essential requirements to meet a specific demand, whilst 'lifestyles' are considered to be optional choices. - Consider moving the 'timing and supply' elements from Policy 2 into Policy 1.	1. Ensure the timely and appropriate supply of well-designed, diverse and affordable housing that responds to population growth, social and cultural needs and changing demographics and incomes of our current and future communities.	SPP 1
2. Ensure there is a timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.	<u>Overall Location and Integration of Housing (Policy is applicable in all locations).</u> - 'Timely supply' could be included in Policy 1 as this is linked to changing population and demographics – i.e. housing supply and demand is located in one policy. - This policy can focus on integrated housing, which is linked to SPP 1 Integrated Planning. - This policy should be inclusive.	2. Ensure housing is well located and planned, integrated with and connected to the services, facilities, public transport and infrastructure needed to support inclusive, liveable and walkable neighbourhoods.	SPP 1
3. Support regional centres and town growth and the demand for increases in housing supply within the existing town footprint or outside towns where there is demonstrated demand and it is contiguous with the existing development area.	<u>Regional Centre and Town Growth</u> - If Policy 3 is read in conjunction with Policies 1 and 2, references to housing supply can be removed from Policy 3, thus focussing the policy on centre and town growth. - 'Need' suggests there has been an assessment and demonstrated evidence for growth / expansion (as opposed to demand, which can be interpreted in many ways).	3. Ensure the growth of regional centres and towns is prioritised within existing centre and town footprints and where there is a demonstrated need for expansion, growth is contiguous with the existing developed area.	SPP 1

<p>4. Promote residential and mixed-use development in centres and corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.</p>	<p><u>Greater Adelaide and Inner Adelaide Growth</u></p> <ul style="list-style-type: none"> - 'Increased housing densities' has been moved up from Policy 6 into this Policy and is clearer than 'densities required'. - Adelaide City is a walkable community / key location / transit orientated area and has been moved from Policy 6 and joined corridors and centres. - NOTE: activity centres, public transport nodes and strategic transit corridors language used in SPP 1. 	<p>4. Promote residential and mixed-use development and increased housing densities in activity centres, public transport nodes & corridor catchments, high / main streets and Adelaide City to enhance the economic importance of these locations and support the viability of public transport services.</p>	<p>SPP 1</p>
<p>5. Provide a permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.</p>	<p><u>Built Form and Tenure</u></p> <ul style="list-style-type: none"> - Housing diversity should be in all zones, not just residential zones. - Housing diversity should be provided across the state, not just in Adelaide City. - The wording of 'accommodation for the ageing' is more open and can mean many housing forms as opposed to 'aged care accommodation'. - Important to include density, types and sizes to reinforce greater diverse. 	<p>Enable a greater diversity of housing densities, types, sizes and tenures to support a wide diversity of household income groups and household structures, including student housing, accommodation for the ageing and people with disabilities.</p>	<p>SPP 2</p>
<p>6. Increase the amount and diversity of residential accommodation in Adelaide City to support a variety of household types for a range of age and income groups, including students, professionals and the ageing.</p>	<ul style="list-style-type: none"> - The intent of this policy has been incorporated in Policy 4 and Policy 5. - If these policies are reworded as suggested, this policy could be removed. 	<p>Suggest removal.</p>	
<p>7. Enable and encourage the provision of Affordable Housing through incentives such as planning policy bonuses or concessions (e.g. where major rezonings are undertaken that increase development opportunities).</p>	<p><u>Affordable Housing / Housing Affordability</u></p> <ul style="list-style-type: none"> - State based policy is a minimum of 15% Affordable Housing. - 'Ensure' is stronger than 'enable' and is important to support referral arrangements. - Incentives are <i>essential</i> to the supply of Affordable Housing. - 'Schemes' is included to support any future Affordable Housing funding schemes that may be introduced in the future such as offsets and value capture. - Financial schemes and initiatives linked to the Affordable Housing Program (such as shared value, shared equity schemes and the potential for affordable rental / build to rent schemes) operate outside of the planning system but are heavily linked to Affordable Housing policy in the planning system and the Affordable Homes Program. - The policy must do two things. A large percentage of Affordable Housing is now voluntarily provided by developers in projects that include 20 dwellings or less and therefore this needs to be maintained and encouraged further. The policy must also ensure a minimum of 15% is provided in significant developments (including government owned land). - Suggest removal of 'where rezonings are undertaken that increase development opportunities' as this is restrictive and implies an <i>application or process</i> rather than a policy (implementation of the policy is a separate exercise). 	<p>Ensure and encourage the provision of Affordable Housing, including a minimum of 15% Affordable Housing in significant developments by utilising; agreements, incentives such as planning policy concessions and bonuses and financial schemes within and outside planning legislation.</p>	<p>SPP 1</p>
<p>8. Support the creation of healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.</p>	<p><u>Healthy Neighbourhoods</u></p> <ul style="list-style-type: none"> - Need to include inclusive - Reference to schools, and social and community facilities 	<p>Support the creation of inclusive and healthy neighbourhoods that enable walkable access and active travel to; local shops, public services such as schools, community facilities and infrastructure, quality open space, recreation and sporting facilities and public transport.</p>	<p>SPP 1</p>

Non-Statutory Guidance Notes

The Planning and Design Code should implement State Planning Policies through zoning that ~~supports~~ facilitates Affordable Housing outcomes.

Related or Linked SPPs: suggest inclusion of SPP 3 Adaptive Reuse