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14 September 2018

Planning Engagement
Department of Planning Transport and Infrastructure
PO Box 1815
Adelaide 5001

Dear Sir/Madam,

Draft State Planning Policies for consultation

Thank you for the opportunity to provide comment regarding the draft State Planning Policies. Please note that while these comments have been endorsed by Council's Strategic Planning Committee they are still to be adopted by Council and should therefore be taken as preliminary at this stage.

The draft SPPs are relatively concise, clear and cover a wide range of relevant subjects at a relatively high level. It is noted that because the policies are high level there are many areas of potential conflict between policies and the resolution of these areas will create significant tensions in the preparation of Regional Plans and in the application of the Planning and Design Code.

The catch-all nature of the policies which are generally not applied to localities or areas make it a challenge to identify issues that are specific to the City of Playford. However, a number of matters that require consideration have been identified:

- The emphasis on design quality in the SPPs is supported as an important element in maintaining Adelaide's renowned quality of life. It is noted that there is a significant challenge in maintaining design quality for residential development, particularly in combination with increasing urban densities and potential planning policies which exclude development from planning assessment. The SPPs also strongly emphasise establishing a permissive policy environment for housing. There will need to be very careful consideration regarding implementation of the SPPs through the Planning and Design Code.
- The employment lands policies are an important area of policy for the City of Playford as the City strives to ensure a strong economic future. There is a very strong emphasis on the reinforcement of the Adelaide CBD in the SPPs. Greater metropolitan Adelaide extends many kilometres to the north and south of the Adelaide CBD and the regional centres also play an important role which requires recognition in the SPPs. While it is appropriate to acknowledge the role of Adelaide CBD, there is also a need to balance this with recognition for the appropriate development and enhancement of centres such as Elizabeth Regional Centre / Northern CBD which play a key role in provision of higher level services and facilities and act as public transport and cultural hubs for surrounding suburbs. It is not appropriate for this to be left to resolution at a regional planning level.

- Employment lands policies also need to be clearer about ensuring that land identified for future employment lands such as Greater Edinburgh Parks, is retained for this purpose. Adelaide is increasingly relying upon privately owned land that is designated through the 30 year Plan for employment lands in the medium to long term. This land inevitably comes under pressure for residential development which can often be realised in shorter time frames. It is critical that well located land close to strategic transport routes such as expressways and rail freight routes and separated from residential development is maintained for employment purposes.
- The section on integrated planning includes a diagram which illustrates current types of development from the central city through to natural areas beyond the metropolitan fringe. Unfortunately this diagram is more reflective of current urban circumstances where outer urban areas are not well provided with public transport, walking and cycling opportunities. The diagram does not serve a useful purpose in a document which is intended to set the framework for future development.

The City of Playford looks forward to these matters being addressed in the final version of the SPPs. Please contact Paul Johnson if you have any enquiries on telephone [REDACTED] or email [REDACTED].

Yours faithfully

Greg Pattinson
SENIOR MANAGER STRATEGY AND POLICY

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