

**City of Burnside Submission  
Draft State Planning Policies for South Australia  
For Consultation – July 2018**

City of Burnside – General Comments and Concerns		
1	<b>Community Engagement</b>	<ul style="list-style-type: none"> <li>At the time key Planning Reform documents such as this are released, it would be beneficial to:               <ul style="list-style-type: none"> <li>➤ see the accompanying <i>Community Engagement Charter</i>, and</li> <li>➤ know when the broader community will have access to submissions received; and</li> <li>➤ know when and how the government will respond to the concerns raised during the consultation process.</li> </ul> </li> </ul>
2	<b>Scope of Policies</b>	<ul style="list-style-type: none"> <li>It is not clear from either the draft policy document or the accompanying documentation that the 16 policies identified are just the top 16 of many more that were considered during the drafting process</li> <li>Why were these 16 policies identified as the top priorities for the State, as opposed to the many others which were considered?</li> </ul>
3	<b>Competing Objectives &amp; Policies</b>	<ul style="list-style-type: none"> <li>While it is acknowledged that several of the policies overlap and have competing interests, there is little guidance as to how this will be resolved and who will decide which policy is given precedence.</li> </ul>
4	<b>Inconsistent Detail</b>	<ul style="list-style-type: none"> <li>There appears to be an inconsistent approach to the depth, detail and structure of each of the policies. The Cultural Heritage policy, for example, contains just two underlying policies whilst the Employment Lands policy contains ten sub-policies.</li> <li>Several of the topics are not holistic, things have been left out. i.e. 'green infrastructure' but nothing on green canopies etc.</li> </ul>
5	<b>Existing Established Character &amp; Heritage</b>	<ul style="list-style-type: none"> <li>There appears to be an underlying theme of urban infill running through the draft Document. There is concern that this objective will be to the detriment of the character and amenity of existing established areas and this dichotomy needs careful and thorough consideration and open and meaningful deliberation with Councils and their existing communities.</li> </ul>
6	<b>Ecologically Sustainable Development &amp; Water Sensitive Urban Design</b>	<ul style="list-style-type: none"> <li>There should be greater emphasis on and expansion of the Policies pertaining to the principles of environmentally sustainable design, low energy buildings, and water sensitive urban design.</li> </ul>
7	<b>Green Canopy</b>	<ul style="list-style-type: none"> <li>There should be greater emphasis on and expansion of the Policies pertaining to an urban green canopy</li> </ul>
8	<b>Hills Face Zone</b>	<ul style="list-style-type: none"> <li>Reassurance is sought that the scope and intent of the Hills Face Zone will continue to be recognised at the State level and transferred across to the new Code.</li> </ul>
9	<b>Infrastructure Capacity</b>	<ul style="list-style-type: none"> <li>Much of the document focusses on the integration of housing and development with existing and proposed infrastructure networks. There is little, if any discussion around the capacity and age of the existing infrastructure networks (e.g. stormwater, road, power) and the ability for these networks to cope with any increase in housing density. How will this issue be resolved and/or considered in the spatial application of the P &amp; D Code?</li> </ul>

Page	State Planning Policy	City of Burnside - Comments specific to Policies
Pg 20	1. Integrated Planning	<ul style="list-style-type: none"> <li>• Pg 21 Urban form diagram (needs a Title &amp; link to text) – makes no reference to vast areas of low density residential suburbs which have their own important and distinct character</li> <li>• P1 states '<i>Plan growth in areas of the state that are connected to, integrated with...existing and proposed transport routes</i>' needs to give detailed consideration to the capacity of existing infrastructure – many older, established suburbs have ageing infrastructure (roads, stormwater) which are already at capacity and any increase in housing density will escalate these problems</li> <li>• P5 states "<i>plan for urban growth to protect and preserve opportunities for high value horticulture, tourism and landscape character areas</i>" - protection of areas of built form character should also be recognised</li> <li>• P6 states '<i>Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities</i>' is likewise too arbitrary. Policy is too broad, not all suburbs are suitable for or need regenerating.</li> <li>• P7 to '<i>Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced carparking...</i>' is concerning and too subjective. Many inner suburban areas are well served by public transport but have an undersupply of car parking. Consideration of existing capacity of existing local street networks is crucial.</li> <li>• P8 to '<i>Support metropolitan Adelaide as a predominantly low to medium rise city, with high-rise focussed in the CBD...</i>' is too broad and does not recognise the valuable contribution existing areas of low density residential make to our cities liveability, amenity and housing choice</li> <li>• Low density character areas need to be protected and mechanisms provided for the setting of density levels that are specific to the character of local areas.</li> <li>• Policy should include the ability to foster community development and create community spaces</li> </ul>
Pg 24	2. Design Quality	<ul style="list-style-type: none"> <li>• P1 to "<i>ensure plans encourage development that incorporates the Principles of Good Design</i>" does not send a strong enough message. Word '<i>encourage</i>' should be replaced with "<i>require</i>"</li> <li>• P6 to "provide high quality, functional....." is subjective. Term '<i>high quality</i>' needs definition.</li> <li>• P4 focuses on good design of complex development – good design of smaller scale development is equally important</li> <li>• P7 - question the need to prioritise design quality outcomes – design quality outcomes should be all encompassing</li> <li>• P8 refers to quality design solutions in low-medium density areas – should also reference heritage and character</li> <li>• Lack of reference to existing established character and heritage and the importance of respecting these buildings and areas through good design</li> <li>• Policies need to be linked strongly to the P&amp;D Code</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policies do not reference the basic design principles of appearance, site consideration, acoustics, and orientation</li> <li>• Policies need to have a greater focus on energy efficiency and sustainability through design</li> <li>• Waste management is missing here (and needs greater emphasis throughout many of the other policies)</li> <li>• CPTED is missing here (and needs greater emphasis throughout many of the other policies)</li> </ul>
Pg 26	<b>3. Adaptive Reuse</b>	<ul style="list-style-type: none"> <li>• Supportive of adaptive reuse if it encourages the retention of existing buildings, however, there is no clear relationship to a heritage framework</li> <li>• Further detailed needed around the provision of flexibility and how this may impact existing established areas</li> <li>• Provision of planning and development incentives to encourage adaptive re-use requires caution, particularly in character areas or in areas where there are already issues with on-street parking etc</li> <li>• Reference should be made to Policy 16 <i>Emissions &amp; Hazardous Activities</i> – knowledge of previous use &amp; potential contaminants in and around buildings is important</li> </ul>
Pg 28	<b>4. Biodiversity</b>	<ul style="list-style-type: none"> <li>• Limited recognition of biodiversity in local urban areas (e.g. creek systems, reserves, HFZ) and minimal recognition of amenity benefits of biodiversity in urban areas.</li> <li>• No reference to importance of a green canopy (particularly in urban areas) and the role this plays in climate change mitigation etc.</li> <li>• No reference to urban green cover &amp; green canopy targets of <i>30-Year Plan</i> (particularly in urban areas).</li> <li>• Need for maintenance of wildlife (tree) corridors to support wildlife and birdlife particularly those linking Hills Face Zone to local parks and reserves.</li> <li>• How will the competing <i>30 Year Plan</i> targets around infill and urban tree canopy be resolved? How will the conservation of biodiversity be reconciled with increased urban density?</li> <li>• No reference to importance of individual trees (including exotic tree species) and recognition that they are an intergenerational asset and have a measurable value to the community – policies biased towards “areas” of significance.</li> <li>• Clarification sought regarding relationship to non-indigenous tree species which provide valuable shade, cooling, amenity, habitat benefits in inner urban areas in particular.</li> <li>• P2 refers to “minimising” loss of biodiversity and “where possible” The use of these terms undermines and waters down the intent of the policy and could be used as out-clauses in cases where there are competing and opposing interests at stake (e.g. economic benefits) There should be some focus on preventing biodiversity loss, not just “minimising”.</li> <li>• P2(a)(b)(c) refers to the avoidance of “impacts” on biodiversity. The term “impact” should be defined.</li> <li>• The creation of biodiversity (separate to the concept of conservation and maintenance) is not addressed.</li> <li>• Reference to appropriate species selection and tree planting in urban areas is crucial.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Guidance notes appear largely focussed towards semi-urban/rural areas.</li> <li>• Guidance notes refer to the protection of areas of biodiversity value – there is no reference to special individual trees.</li> <li>• Guidance notes should make reference to the P &amp; D Code promoting policies that protect and establish green canopy areas and corridors and individual trees of significance.</li> <li>• Need to include recognition of the environmental value of Significant and Regulated trees.</li> <li>• Protection of Significant and Regulated trees should be strengthened.</li> <li>• Need to consider how people can engage with biodiversity (e.g. for educational purposes).</li> </ul>
Pg 30	<b>5. Climate Change</b>	<ul style="list-style-type: none"> <li>• P1 notion that compact urban form will always deliver carbon-efficient living environments is questioned</li> <li>• P3 should include “infrastructure, as well as buildings (i.e. “ensure the development of climate-smart buildings and infrastructure...”</li> <li>• There is an emphasis on public realm as opposed to private land - individual property owners can implement substantial climate change mitigation measures at the local level</li> <li>• Additional policy needed to address impacts of climate change at local scale – impacts vary across regions</li> <li>• No reference to maintenance of existing green canopy which helps mitigate climate change impacts</li> <li>• Urban canopy should be a separate policy within either “Climate Change” or “Biodiversity”</li> <li>• Needs greater focus on the creation of green space and urban greening as a climate change mitigation measure</li> <li>• Needs greater reference to managing risks and impacts of climate change</li> </ul>
Pg 36	<b>6. Housing Supply &amp; Diversity</b>	<ul style="list-style-type: none"> <li>• Objective is awkwardly written. Who will determine the “as, where and when” required, particularly as private entities can now initiate private Code amendments and their motives may differ to those of government?</li> <li>• P5 Promotion of “permissive and enabling” policy environment is concerning – it appears development driven and potentially at odds with P.1 Integrated Planning policy and P.2 Design Quality, particularly if development is ‘deemed to satisfy’ with limited opportunity for scrutinising assessment</li> <li>• Infrastructure capacity needs further recognition. While there is some discussion around the provision of housing to be integrated with and connected to areas/services, facilities and infrastructure, there is no discussion around “infrastructure capacity” and how this will influence an areas ability to adequately cater for increased demand e.g. ageing stormwater infrastructure, existing road networks etc</li> <li>• Areas of established character need further recognition</li> <li>• Alternative forms of housing not promoted e.g. accessory dwellings, laneway housing</li> <li>• Term “affordable” housing needs to be defined</li> <li>• Clarity is sought around the provision of “affordable” housing, particularly in areas such as Burnside where land values alone will preclude many potential purchasers and is strongly</li> </ul>

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		<p>influenced by the property market (and out of the scope of Council's influence)</p> <ul style="list-style-type: none"> <li>• Encroachments may have a role in increasing supply but this will need to be approached with caution</li> </ul>
Pg 38	7. Cultural Heritage	<ul style="list-style-type: none"> <li>• Policy lacks detail – concerning that there are only two sub-policies which could be reflective of the low priority this policy has been given</li> <li>• There is no reference to the importance of <u>built</u> heritage and the status of existing Historic Conservation Zones and contributory items remains unclear.</li> <li>• Further recognition needed of valuable contribution built heritage brings to state and local communities</li> <li>• Guidance notes make reference to the P &amp; D Code incorporating existing state and local heritage items – there is no reference to existing Historic Conservation Zones or contributory items</li> <li>• Objective refers to conservation of “heritage areas”. What areas does this include? There are no corresponding policies which address the conservation of heritage areas.</li> <li>• P1 refers to historically significant places – which places are being referenced?</li> <li>• P1 refers only to ‘<i>sensitive and respective use.....places</i>’ – no reference to recognition and protection</li> <li>• P2 refers to recognition of indigenous cultural heritage sites. Relates only to indigenous heritage. Given the sensitivities surrounding the identification/mapping of indigenous sites, how will this policy be achieved?</li> <li>• Policy needs relationship to education process for development industry around indigenous cultural heritage sites.</li> </ul>
Pg 44	9. Employment Lands	<ul style="list-style-type: none"> <li>• Lacks reference to small business and its role in fostering community</li> <li>• Lacks reference to alternative sources of employment such as schools and hospitals which are often major employers in many local areas</li> <li>• P9 refers to encouragement of mixed-use precincts and management of conflicts between uses – needs stronger relationship to P &amp; D Code and discussion around interface issues, particularly adjoining sensitive uses</li> </ul>
Pg 46	10. Key Resources	<ul style="list-style-type: none"> <li>• No reference to ongoing and future management of key resource operations which currently exist in urban areas e.g Stonyfell</li> </ul>
Pg 50	11. Strategic Transport Infrastructure	<ul style="list-style-type: none"> <li>• Assumes integration of transport infrastructure with land use, but doesn't give priority to when existing areas of place/function can influence location of transport</li> <li>• Focuses on major &amp; regional infrastructure. No reference to strategic transport routes in urban areas e.g. Portrush Rd, Glen Osmond Rd and resultant noise /pollutant impacts &amp; conflict</li> </ul>
Pg 54	12. Energy	<ul style="list-style-type: none"> <li>• Policies are very high level. Relationship to sustainable development should be made – sustainable design can result in significant reduction in energy consumption/demand at the local level</li> <li>• How will this policy be reflected in the Code? Particularly at individual property level.</li> <li>• Reliability of supply should be included in policies</li> </ul>

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Pg 60	<b>14. Water Security &amp; Quality</b>	<ul style="list-style-type: none"> <li>• Water security should be part of the Objective</li> <li>• Objective and policies should make reference to alternative supplies of water</li> <li>• P.1 refers to "... the protection &amp; security of states water supply to support a healthy environment, vibrant communities &amp; a strong economy" – this policy aims to be "all-encompassing" but will be difficult to achieve without strong connection and links to most of the other SPPs</li> <li>• P.4 refers to the provision of land use policy which aims to "... and improve urban amenity" - it is unclear how this is to be achieved in existing established and built up areas?</li> <li>• WSUD policies briefly mentioned in accompanying text but not promoted in either the objective or policies – critical when undertaking infill development to ensure water quality &amp; decrease flood risk down stream</li> <li>• Guidance notes make reference to the P &amp; D Code promoting water sensitive urban design but this is not promoted in the policies</li> <li>• No reference to the status/promotion of stormwater and waste water capture and reuse mechanisms at local and neighbourhood level, such as detention/ retention tanks and the recycling of grey water</li> <li>• Aimed at macro level – limited recognition of small scale works that can contribute to water supply protection &amp; collection – wetlands, detention, WSUD policies</li> <li>• Need to include provision for the protection of aquifers from contamination resulting from development activity.</li> </ul>
Pg 62	<b>15. Natural Hazards</b>	<ul style="list-style-type: none"> <li>• No direction for existing areas subject to natural hazards – flood prone areas, bushfire risk areas</li> <li>• P4 promotes use of green infrastructure to create cooler micro climates - makes no reference to cooling potential of urban green canopy, appropriate design of development and public spaces</li> <li>• P4 term <i>green infrastructure</i> needs defining</li> <li>• Green infrastructure promoted but not referenced to in Guidance notes as to how this will be achieved</li> <li>• Earthquakes not included in list of natural hazards</li> </ul>
Pg 64	<b>16. Emissions &amp; Hazardous Activities</b>	<ul style="list-style-type: none"> <li>• Relationship to Policy 3 <i>Adaptive Reuse</i> not discussed. Historically, both areas and buildings in both rural and urban areas may have been occupied by more harmful land uses.</li> </ul>