



CITY OF
TEA TREE GULLY
Naturally Better

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31 Aug 2018

DPTI

Ms Sarah Elding
Project Lead State Planning Policies
Dept. of Planning, Transport and
Infrastructure
GPO Box 1815
ADELAIDE SA 5001

29 August 2018
Our ref: 16/595

Dear Ms Elding

Draft State Planning Policies – Council Response

Please find attached Council's comments in relation to the draft State Planning Policies, which were endorsed by Council on 28 August 2018.

If you have any comments in relation to this matter, do not hesitate to contact directly on [REDACTED] or via email [REDACTED].

Yours sincerely

Brett Steiner
Team Leader, Planning Strategy

Comments – State Planning Policies – August 2018

Page No.	Section	Comments
N/A	General comments	<ul style="list-style-type: none"> The draft State Planning Policies cover the key issues that are expected to be addressed within the State’s Planning System and generally reflect contemporary urban planning principles. Clarify the role of the policy content within the 30 Year Plan for Greater Adelaide (which was recently updated) given that there is significant duplication – consider refining 30 Year Plan to only contain spatial content rather than broad policies / issues to avoid duplication, confusion and potential inconsistency.
P14	Principles of Good Planning: Long-term focus principles	<ul style="list-style-type: none"> Support
P14	Principles of Good Planning: Urban renewal principles	<ul style="list-style-type: none"> Support
P14 - 15	Principles of Good Planning: High-quality design principles	<ul style="list-style-type: none"> Consider consistency with Design Principles in Design Quality section - potential to consolidate rather than having two sets of ‘design principles’ to avoid duplication and inconsistency? “Built form and the public realm should be designed to be inclusive and accessible for people with differing needs and capabilities (including through serious consideration of universal design practices)” – the term ‘serious consideration’ seems ambiguous and optional, whereas the Act indicates that policies will ‘support’ or ‘promote’ universal design.
P15	Principles of Good Planning: Activation and liveability principles	<ul style="list-style-type: none"> Generally support Point one indicates that planning should promote ‘mixed use’ neighbourhoods. The mix of uses needs to be considered depending on existing context e.g. community facilities and education may be suited to suburban environments and residential zones, whereas a greater mix of land uses may be appropriate in and around key centres etc.
P15	Principles of Good Planning: Sustainability principles	<ul style="list-style-type: none"> Support
P15	Principles of Good Planning: Investment facilitation principles	<ul style="list-style-type: none"> Support
P15	Principles of Good Planning: Integrated delivery principles	<ul style="list-style-type: none"> Support

Page No.	Section	Comments
P16	Our Targets	<ul style="list-style-type: none"> • Duplication with 30 Year Plan - feedback previously provided as part of the 30 Year Plan Update consultation.
P21	Policy 1 Integrated Planning Overview image	<ul style="list-style-type: none"> • Diagram reinforces the focus on CBD and inner rim for investment in education, public transport infrastructure, facilities and services and access to employment • Conveys that middle ring and outer suburbs will not be a focus for these activities which is misaligned with targets in Part 4 and principles in 30 Year Plan relating to creating 'healthy neighbourhoods' i.e. is it indicating that this will only be achieved in Adelaide's inner-suburbs / inner rim? • This also does not reflect current state. E.g. in relation to employment only 17% of residents in City of Tea Tree Gully (CTTG) work in Adelaide CBD with most employment provided in CTTG (22%), Pt Adelaide Enfield (13%) and Salisbury (12%) – these key 'employment nodes' often aren't located in the inner-suburbs.
p. 22	Policy 1 Integrated Planning	<ul style="list-style-type: none"> • Generally support • Policy 2 – <ul style="list-style-type: none"> ○ Support the use of an urban boundary such as the Environment and Food Protection Areas (EFPA). ○ This should be reviewed given the boundary in metro areas generally adopts the previous urban boundary (generally the Hills Face Zone boundary) which hasn't undergone any recent review - it is expected that there is some land that would form a logical extension to the urban area of Adelaide without impacting on the intent and effectiveness of the EFPA. • Policy 6 – Council supports this approach and considers that the State Government should review the distribution of developer contributions for open space and infrastructure to enable Councils to support regeneration through upgrades to infrastructure and open space. • Policy 7 – <ul style="list-style-type: none"> ○ Council supports housing choice and mixed use development, particularly in locations close to transport and large activity centres ○ Council is keen to continue to capitalise on the infrastructure, retail and services including the O-Bahn to grow housing and employment opportunities in this location

Page No.	Section	Comments
		<ul style="list-style-type: none"> ○ There should be consideration to how large government owned sites in these locations could contribute to revitalisation, employment and housing growth with consideration to Renewal SA or other authorities actively promoting growth and revitalisation in these locations where government land holdings exist ○ Policy 7 seems to focus on ‘reduced car parking’ numbers as the primary means to change travel behaviour and support walking / cycling / public transport. Investment in walking, cycling and public transport infrastructure are more critical and should be more strongly recognised. The term ‘reduced’ may imply a rate that provides less parking than demand, rather than a rate that reflects parking needs based on context and alternative modes available (i.e. appropriate rate for residential in mixed use close to rapid transit compared to residential in suburban context). Suggest that the term ‘reduced’ be clarified.
p.25	Design Quality	<ul style="list-style-type: none"> ● Generally support ● Policy 4 – <ul style="list-style-type: none"> ○ City of Tea Tree Gully currently funds its own urban design advisory service to provide design advice to internal staff, CAP and developers (including pre-lodgement advice) ○ Consider how design advice can be delivered to assessing authorities and provided to potential applicants. For example previously, the SA Government partly funded heritage advisory services, which was successful in upskilling staff, assisting developers and embedding this knowledge within Councils (many of which have continued beyond state funding being provided). ○ Previous design advice and design review processes from Office of Design and Architecture SA / Government Architects was limited to CBD and inner-rim Council’s. There should be an equitable approach across all SA Councils based on complexity, scale and impact of development. ● Policy 6 – <ul style="list-style-type: none"> ○ When areas are strategically zoned for renewal, infill development or intensification there should be greater access to funds from the open space contribution scheme (or similar) to invest in public space and streetscapes to

Page No.	Section	Comments
		<p>support the development of high quality, liveable places and encourage investment in these areas.</p> <ul style="list-style-type: none"> ○ Currently open space funding is only accessible via competitive grant processes which does not provide certainty to Councils, community or the development sector about investment in infrastructure and open space to support growth in these areas. ○ Access to open space contributions could also provide an incentive for community and Councils to deliver the State’s objectives and encourage renewal and intensification in strategic areas. I.e. often the rezoning occurs without certainty to communities in relation to infrastructure and open space upgrades to support new development. ○ This could be facilitated via direct agreements between state and local government where access to funding is linked to zoning provisions and a program of upgrades agreed between local governments and State Government (e.g. identification of a program of park and streetscape upgrades) ○ Currently Council is funding extensive infrastructure upgrades within Modbury to support growth (e.g. open space and streetscape) with limited funding provided from State Government from the open space contribution scheme. ○ Without access to a funding scheme, Council’s appetite and capacity to invest in these discretionary projects may be reduced, particularly in the context of potential rate capping. This would work against delivery of objectives in the SPPs / 30 Year Plan.
p. 26	Adaptive Reuse	<ul style="list-style-type: none"> ● Generally support ● Incentives should be applied consistently across regions / local government areas and shouldn’t be linked to geographic locations which skew the market towards investing in one location over another e.g. apartment stamp duty concessions in CBD / Bowden but not other locations that have been zoned to support apartment development.
p. 28	Biodiversity	<ul style="list-style-type: none"> ● Generally support ● Consider policies that encourage increasing biodiversity value through development outcomes more as it appears that the current policies focus on minimisation of

Comments – State Planning Policies – August 2018

Page No.	Section	Comments
		impact (e.g. promote use of locally indigenous species, restoration of watercourses etc.).
p.30	Climate change	<ul style="list-style-type: none"> • Generally support • Role of planning could be expanded to include landscape and urban cooling (including role of tree canopy and open space), noting that increasing tree canopy cover is a key target in the 30 year plan for greater Adelaide.
p.34 + 35	Our people and neighbourhoods	<ul style="list-style-type: none"> • Generally support • Generally support principles of liveable neighbourhoods however consideration should be given to the level of government intervention that need to occur to achieve these criteria and the levers available across government and the role of the planning system in delivering this. • It is noted that the principles of healthy neighbourhoods, and the introductory text acknowledge that a whole range of factors contribute to a health and liveable neighbourhood. However, the policies in this section only relate to housing and cultural heritage. Consider expanding to include policies that support access to public space, streets for people, and community services and facilities e.g. schools, recreation, tree canopy coverage etc.
p.36 + 37	Housing supply and diversity	<ul style="list-style-type: none"> • Generally support • Location and design of small lot housing needs to be carefully considered to ensure that it is well located and results in liveable and healthy neighbourhoods. • We understand that the location, form and design of small lot housing will be considered via regional planning and the development of the Planning and Design Code and consider that Councils need to play a key role in the development of this. • Generally support an enabling policy for aged care as it is difficult to find appropriately zoned land for these activities. This has been a barrier to provide aged care accommodation as often have to compete for land against commercial and retail developers within retail centres. It may also be beneficial to consider incentives for multistorey aged care facilities in appropriate locations.
p. 38	Cultural heritage	<ul style="list-style-type: none"> • Support
p.42	Primary Industry	<ul style="list-style-type: none"> • Support
p.44	Employment Lands	<ul style="list-style-type: none"> • Generally support

Page No.	Section	Comments
		<ul style="list-style-type: none"> • In particular a more flexible approach to commercial / industrial and other employment focused zones is required to ensure that it responds to changing economic and industry trends • Support allowing greater competition in retail sectors by ensuring adequate land supply for new retail formats as this has been a barrier to new market entrants
p. 46	Key Resources	<ul style="list-style-type: none"> • Generally support • Policy 1 - while the protection of mineral resources is important, this needs to be balanced with the ongoing operations of other land uses and businesses. For example in the Extractive Industry Zone at Golden Grove a range of smaller industrial businesses have been operating for decades without significant impacts on quarry operations. The current policies (non-complying triggers) have significant impact on their ongoing operations, including ability to access finance to grow or sustain businesses. • The zoning could facilitate public uses such as recreation on sites that aren't owned by mining operators and which aren't viable/for mineral extraction in the short – medium term. • Policy 3 – strongly support as transport infrastructure around the Mineral Extraction Zone at Golden Grove is poor including key intersections utilised by heavy vehicles transporting material, which causes safety concerns for the operators and others using this infrastructure.
p. 50	Strategic Transport Infrastructure	<ul style="list-style-type: none"> • Generally support • Policy 1 - When considering DPTI road network, broader consideration to facilitating good development outcomes (rather than only facilitating efficiency of road network) needs to be considered in relation to policy positions. • Policy 2 - Strongly support development that maximises use of existing transport networks and services. Previously, it appeared that there was a focus on development around planned (yet often unfunded) public infrastructure investments such as corridors in the inner rim of Adelaide which were rezoned to support future light rail investments.

Comments – State Planning Policies – August 2018

Page No.	Section	Comments
		<ul style="list-style-type: none"> • It would be more productive to maximise development around existing (rather than planned) transport and hubs such as O-Bahn and other existing fixed transit – many of these are underdeveloped including the interchanges at Modbury, Paradise and Klemzig. • Policy 6 – With a focus on infill and regeneration, encouraging a broader use of transport modes is essential. Consider approaches to support local governments to deliver transport infrastructure in areas of growth and renewal such as the distribution of open space scheme / off-set funds to fund local infrastructure.
p. 54	Energy	<ul style="list-style-type: none"> • Support
p. 56	Coastal Environment	<ul style="list-style-type: none"> • Support
p. 60	Water security and quality	<ul style="list-style-type: none"> • Generally support • City of Tea Tree Gully has local policies requiring on-site stormwater detention - consider how on-site detention policies could be incorporated into the planning and design code and applied across metropolitan Adelaide to reduce the risk of flooding in heavy rainfall events.
p. 62	Natural Hazards	<ul style="list-style-type: none"> • Generally support • Policy 4 – creating cooler micro-climates through green infrastructure needs careful attention during the development of the planning design code and within a permissive policy environment. Consider mandatory landscaping, deep planting areas, tree planting and gross floor area caps / ratios as part of code development and other incentives that could reduce site coverage. Also consider how open space contributions scheme or offset funds could be distributed to address areas where urban heat island impacts are evident.
p. 64	Emissions and Hazardous Activities	<ul style="list-style-type: none"> • Support