Ms Alison Collins  
Project Lead  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5001  

Dear Alison  

Re: Natural Resources and Environment & Integrated Movement Systems - Policy Discussion Papers  

Please find below the Town of Gawler's response in relation to the Natural Resources and Environment & Integrated Movement Systems Policy Discussion Papers released in August 2018 for public consultation. We have endeavoured to accumulate feedback from Council Staff and Elected Members to provide professional and meaningful comment regarding these discussion papers.  

Feedback is provided under each Discussion Paper heading:  

Integrated Movement Systems Policy Discussion Paper  

Theme 1 - Aligning South Australia's Growth with Transport Infrastructure  

It is logical to plan for growth in areas which are already serviced by quality transport infrastructure and by capitalising on investments.  

Theme 2 - Capitalising on Strategic Transport Infrastructure  

This theme discusses planning in relation to 'Strategic Transport Corridors', which is encouraging however, this section is relatively brief.  

Clarification as to whether the code will speak to state strategic documents such as the Integrated Transport and Land Use Plan would be beneficial. Documents such as these provide vision as well as highlight future needs for infrastructure to service our growing communities.  

These visions should be incorporated via an overlay into the Code, so that planners can take these matters into consideration when undertaking assessments.
Further to this, elucidation is sought regarding the Department of Planning Transport and Infrastructure’s (DPTI) approach regarding existing and established communities which are currently underserviced by public transport.

Nuances in policy should take into consideration anomalies in dealing with transport across the state. For instance, park and ride requirements differ from transit corridors in the current Urban Corridor Zone to end of terminus stations such as Gawler and should be treated differently.

Gawler is not only a growth hub, but acts as a conduit for commuters from regional areas to connect with other areas of greater Adelaide. Many residents of peri-urban councils commute to the Central Business District. Park and ride facilities at these outer terminals must necessarily have a greater focus on providing increased parking, without discounting the provision of cycling and walking facilities.

Metropolitan Adelaide urban corridor areas should increase the focus on improved infrastructure to provide better walking and cycling facilities, with heightened provision and integration of public transport to enable a reduction in vehicle ownership and reliance.

Cooperation between the State departments is essential to ensure that the required transport framework is available in a timely manner to segue with the implementation of the Planning and Design Code and ensure that zoning delivery does not outstrip necessary infrastructure, both hard and soft.

**Theme 3 - Sustainable Mobility, Car Parking and the Impact of Technology**

The paper addresses the potential for road widening and cycling routes being incorporated into the Code, which would be a great outcome. It would also be beneficial if the scope could be expanded to include existing and envisioned shared use and walking trails as well as envisioned Park and Ride facilities to help promote more active modes of travel.

The discussion paper speaks to the possible review and inclusion of minimum net residential densities across a number of residential zones. Perhaps a slightly different approach which could be further discussed is the notion of ‘Optimal Densities’.

At times, policy can be worded so strongly around pursuing certain densities that it can almost take precedence in an assessment or be pushed by an applicant. By slightly shifting the approach, this could possibly allow for better design outcomes, as the focus may no longer be so density centric and promote more site specific discussion, resulting in improved design outcomes.

**Natural Resources and Environment Policy Discussion Paper**

**Theme 1 - Sustainable and Liveable Urban Environments**

There is considerable discussion pertaining to Water Sensitive Urban Design (WSUD) and the management of stormwater, particularly within challenging areas which are experiencing increasing rates of infill development.
This will be a matter for ongoing refinement with a strong suite of WSUD principles likely to be transition ready however, further enhancement is expected through future generations of the Code. It would be greatly beneficial if these policies could speak to maximising stormwater reuse schemes where practical and supporting the benefits of this resource.

In terms of the flood plain, which considerably affects this Council area, the Town of Gawler has commissioned new flood data not yet incorporated into the Development Plan due to the implementation of the Planning Reforms. Councils possessing more up to date data than that currently contained in their Development Plan should be requested to provide this to DPTI for inclusion into the first generation of the Code.

The National Construction Code (NCC) governs the achievement of energy efficiency in buildings. The Planning and Design Code should not contradict the provisions of the NCC, as has been the case with some Development Plan policy in the past. This will result in faster and more efficient assessment of applications.

There have been cases where energy efficiency reports provided as part of private certification have been discovered by Council staff to have errors, which cannot be amended due to a Consent having been issued. The auditing of building professionals through accreditation is viewed favourably to improve this and other issues, resulting in the creation of safer and more sustainable neighbourhoods.

The promotion of renewable energy sources, alternative energy supply and storage options are essential in the quest to reduce energy costs and our carbon footprint and is wholeheartedly supported by this Council.

Effective waste management and continuation and improvement of the current policy will ensure sustainable disposal and minimisation of the quantity of waste in this State.

**Theme 2 - Water Security and Quality**

Although the Town of Gawler does not contain any water protection areas, the protection of our water resources is of utmost importance to the State. In view of the expected growth for Greater Adelaide, ensuring the security of water provision and the continuation of its quality is essential to our sustainable future.

**Theme 3 – Biodiversity**

The Town of Gawler is hoping to see strong policies which protect and promote areas of high biodiversity value. Noting this, reference no. 3E appears encouraging and should be treated as a priority, Council acknowledges this would be a considerable undertaking and assumes this is the reason it has been postponed to a later generation of the Code. Nevertheless our Council wishes to see this priority remain high on DPTI’s agenda through the ongoing development of and refinement to the Code.

In closing, these discussion papers are very much interrelated and speak to the overarching issue of climate change and how we as a community can seek to minimise our impact moving forward. The effects of climate change are now irrefutable and pose a serious threat to our most valuable natural assets as well as our own livelihood if considerable changes are not made to curb warming.
Although the issue requires large scale change and collaboration across numerous industries and government, the role of urban planning can play a significant and valuable role and should be fully utilised. Through the development of the Planning and Design Code, the Town of Gawler wishes to see bold and leading policy developed and implemented.

Kind regards

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