



**MOUNT BARKER
DISTRICT COUNCIL**

Reference: DOC/18/98496

7 September 2018

*Sarah Elding, Project Lead State Planning Policies
Department of Planning, Transport and Infrastructure
Level 5, 50 Flinders Street, Adelaide 5000
GPO Box 1815, Adelaide SA 5001*

Dear Ms Elding



RE: Draft State Planning Policies

In reviewing the Draft State Planning Policies, Mount Barker District Council is of the opinion that, in general, the draft policies represent sound planning principles and a measured approach.

Council is well aware and understands the role that these Draft State Planning Policies (SPPs) function within the statutory framework set by the Planning, Infrastructure and Development Act 2016.

In recognising this, and of significant interest and concern to Council is how these overarching policies will be realised in the upcoming Planning and Design Code, through the implementation and spatial application of zones, subzones, overlays and provisions.

There is significant alignment between Council's strategic directions and planning policy outcomes realised in its recent Development Plan Amendment (DPA) Program. These Amendments focused on the Mount Barker Town Centre, Nairne Township, and expanding employment land supply at Totness.

Of special note is the Rural (Primary Production Protection) DPA where the strategic direction of the DPA is validated by the draft policies, in Biodiversity, Primary Industry, Climate Change, Employment Lands as well as Water Security and Quality.

However there are a number of concerns and issues which have been identified. They are discussed in the following paragraphs;

Adelaide metro-centric nature of Urban related policies

The Draft SPPs, especially those relating to residential development, mixed use and infill development are focused on metropolitan issues. It is not always possible to scale down policy objectives that apply to metropolitan suburban locations to

regional or rural townships. This comment has been previously conveyed in Councils response to the Draft 30-Year Plan update for greater Adelaide – 2017 Update:

“Metro-centric targets which focus only on the inner and Middle Metropolitan areas”

State Planning Policy 2 Design Quality

Although generally supported, the detail of how several of the proposed polices will actually be implemented is of interest and concern to Council. Care must be taken to ensure the high-level policies and statements are reflected and then enforced within the proposed statutory framework. Council is keen to assist DPTI with ensuring this is achieved and wish to recognise the challenge of regulating design standards, which can be a very subjective field.

State Planning Policy 7 Cultural Heritage

It is noted that, while there are 99 policies in total, there are only 2 policies that address built heritage outside of the City of Adelaide. One of these policies is located within the State Planning Policy 3 -Adaptive reuse.

This would appear to be a significant diminution of the importance of heritage places and areas in the suite of State Planning Policies when benchmarked against heritage policies in the recent 30 -Year Plan for Greater Adelaide 2017 Update:

- P33 *Recognise the value that communities place on heritage and ensure that new development is implemented sensitively and respectfully.*
- P34 *Ensure heritage places and areas of heritage value are appropriately identified and their conservation is promoted.*
- P35 *Encourage the innovative and sustainable reuse of heritage places and older building stock in a way that encourages activity and entices people to visit.*

There appears to be a little acknowledgement of the importance between the conservation and maintenance of heritage places, heritage areas and those historic and period buildings that contribute to both the significance and character of those heritage areas and the relationship to economic health of townships in the outer metropolitan and other rural areas. I refer to the following paragraphs that comprised part of Council’s response to the Local Heritage Reform Discussion Paper.

The integrity of the Local Heritage Places, their overriding contribution to the streetscape and hence character of the main streets are viewed by Councils as integral to maximizing the economic potential of townships and to the health of the local small business community.

Council in both the Regional Town Centre and Nairne and Environs Development Plan Amendments have introduced polices that intend to utilise the retention and enhancement of the Historic Conservation Area, Local Heritage Places and Contributory Items as drivers for economic activity.

The Non-Statutory Guidance Notes details that the first version of the Code will incorporate existing state and local heritage items currently listed in the Development Plans. Further the code will include a State Interest Overlay that identifies places and areas of Commonwealth and State heritage along with the referrals to the approval government agencies.

Given the direction of the Guidance Notes, Council queries what will happen to the existing Local Heritage Places and Historic Conservation Areas in terms of spatial representation given that all State and Local Heritage, Contributory Items, Historic Conservation Areas and State Heritage Areas are already spatially represented on an Overlay Map with the Development Plans?

It is noted that the second policy states:

Recognise and protect of indigenous cultural heritage site and areas of significance.

This is considered problematic as there is no reference to indigenous cultural heritage in the Planning, Development and Infrastructure Act 2016. Likewise *The Aboriginal Heritage Act 1988* does not reference to the *PDI Act 2016*.

Community Engagement Charter

Council sincerely hopes that that in line with Principle 1 of the Communications and Engagement Plan for the Draft State Planning Polices, the State Government will genuinely listen to and act upon the feedback received from our community and Council.

In summary, Council welcomes the recognition that the new Code must relate to agreed principles and that they provide key direction for development across the State. Council would like to have noted the concerns raised above and would welcome the opportunity to continue to work proactively with DPTI in not only resolving the SPP's but to also work collaboratively on the detail within the Draft Planning and Design Code.

If you wish any further clarification on the issues raised in this response please contact Simon Coote on [REDACTED] or [REDACTED].

Yours Sincerely



Marc Voortman
General Manager, Planning and Development (Acting)

Cc: Local Government Association