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18 September 2018

Chairperson Mr Tim Anderson QC
The State Planning Commission
GPO Box 1815
ADELAIDE, SA 5001

Dear Mr Anderson

**DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA
– DRAFT FOR CONSULTATION**

City of Prospect welcomes the opportunity to comment on the Draft State Planning Policies for South Australia for Consultation as released by the State Planning Commission (the Commission) for feedback by 21 September 2018.

Council is aware that the Commission is responsible for preparing the State Planning Policies and City of Prospect wishes to assist the Commission in this role by providing feedback on the current draft.

Council considered the State Planning Policies at its 28 August 2018 Council Meeting and agreed to provide a submission to the Commission. Feedback comments from City of Prospect are summarised in the Attachment to this letter.

City of Prospect is mindful that the State Planning Policies are still in draft form and will be further refined by the State Planning Commission prior to presentation to the Minister for Planning. Council provides this feedback to assist with the update of the State Planning Policies and acknowledges their important role as upper level direction for the planning system and for documents yet to be drafted, including regional plans and the planning & design code.

Looking forward to your consideration and awaiting your response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nathan Cunningham'.

Nathan Cunningham
Director Community & Planning

Attachment

Extract from Council Report (Item 13.10) – Draft State Planning Policies for South Australia - held on 28 August 2018

Summary of assessment

It is unclear from the information provided for consultation as to what level new investigations or research has been undertaken to derive these policies and it would appear that most of the content (with minor adjustments) in the State Planning Policies has been transferred across from the 30 Year Plan for Greater Adelaide.

In general, although there appears to be a reasonable coverage of planning issues provided by the suite of state planning policies there appears to be significant gaps within the policies and little direction is provided where there are tensions between State Planning policies and how they can be reconciled to provide appropriate outcomes.

This situation is unclear and unsettling for councils as these are the lead policies that will direct the content of regional/local plans and the Planning and Design Code. This lack of clarity will be raised in the Council response.

Interestingly, the paper is silent on 'Open Space' planning, an increasingly important land use issue within a more compact living environment, particularly given 30 Year Plan targets around active lifestyle and urban forests (tree coverage). The only reference is to describe 'high quality, functional and accessible public green spaces and streetscapes' under 'Design Quality'. The draft policies do not address what open space provision and type of open space is required within urban areas with higher densities? Or what new models will be applied?

There is a need for SPPs direction to be provided so open space can be spatially applied to Regional/Local Plans and the Council response will seek this.

Not all of the sixteen draft State Planning Policies are specifically relevant to City of Prospect (e.g. Coastal Environment) and the policies that are most relevant to inner metropolitan areas have been reviewed and detailed comments have been provided.

1. Integrated Planning

- Recommended to remove reference to development categories (For example, Inner Suburbs & Infill Development (represented by medium-high density, mostly mixed land uses etc.) within designated areas that are an oversimplification and a misleading interpretation of local areas that are instead promoting a diversification of experiences and opportunities (densities and land uses) to respond to emerging trends. Broad brush statements about 'renewal and regeneration of neighbourhoods' needs to be tempered with support for preservation and enhancement of heritage and character areas
- It is confusing and misleading that housing choice is limited to higher growth areas as stated within this policy, when the 'Housing Supply and Diversity' policy is looking to encourage infill/housing diversity in residential areas. Policies need to 'talk' to each other and reflect overall anticipated outcomes.

2. Design Quality

- Support for the introduction of 'principles of good design', but they need to be reworded to be clearer in their intent. Suggest that principles of good design should be similar to what City of Prospect introduced in our recent Urban Corridor Design Review DPA
- It is unclear from the policy when 'design considerations' would apply and when a more comprehensive 'design review' is required. 'Complex developments' are an arbitrary statement and this needs a more considered response and meaningful definition.
- Arbitrary terminology and terms are constantly used and misused (e.g. 'high quality design', 'complex developments', 'access and inclusion planning') that promotes confusion without adequate definition and explanation
- The link with Regional Plans is tenuous and pitched towards the spatial application of land uses
- Unsure how policy is to be translated into the Planning & Design Code and this link will need to be very strong
- Limited focus on design and misses 'appearance', 'site considerations', 'acoustic performance' and 'affordable and heritage housing'
- Lack of reference to local identity and character
- Lack of reference to other resource documents that seem to have been used in the formulation of the SPPs (e.g. Residential Design Guidelines)
- There is a need to reconcile potential conflict with other policies (e.g. Affordable Housing).

3. Adaptive Reuse

- Support for the idea to encourage the retention and use of buildings (activation, valued buildings & embodied energy)
- The policy is unclear and applies to all buildings without a clear rationale provided (eg. is it related to embodied energy, streetscape activation, better use of heritage buildings, life cycle changes?)
- The intention to provide incentives has a tendency to dilute other positive planning outcomes and result in negative spin-offs
- There is a need to reconcile potential conflict with other policies (e.g. Heritage Conservation, Biodiversity & Affordable housing).

4. Biodiversity

- Support for the high level intent to preserve and enhance biodiversity and this is aligned to City of Prospect's local strategic directions
- How will the cumulative impacts of development on biodiversity be addressed when they are usually assessed independently of each other?
- How will the 'mitigation hierarchy' be written into the Planning and Design Code?
- How does this policy respond to the 20% green cover target?
- The policy is reasonably clear about the relationship of spatially recognised native vegetation areas, but how are expanded areas of biodiversity going to be achieved without a state biodiversity plan (e.g. biodiversity corridors and enhancing 'native vegetation island affects' to make them sustainable)? Also, they are not just wildlife corridors (as is written under 'Regional Plans'), but also support sustainable native vegetation biodiversity

- There is a need to reconcile potential conflict with other policies (eg. Housing Supply and Diversity, Primary Industry, Employment Lands, Key Resources, Energy & Natural Hazards [bushfire protection]).

5. Climate Change

- Support for the high level intent as a key policy issue, climate smart buildings, connection to walkable communities and the need to increase resilience and risk mitigation where required
- No discussion about the impact of the construction industry and recycling building materials, better use of embodied energy and adaptable buildings instead of standard practices of demolition and re-development
- Unsure how this is going to be spatially translated (e.g. Regional Plans and Planning and Design Code).

6. Housing Supply and Diversity

- Provides a link between housing and growth targets and emerging trends
- Support for adaptable & affordable housing and healthy neighbourhoods to meet emerging trends
- Do not support statements around housing and residential zones 'to provide a permissive and enabling policy environment'. Need to also consider character within residential areas that will need strong design policy to protect valued attributes
- Policy focus is on Adelaide City (variety of housing types) when it should be applying to all areas in Greater Adelaide
- Incentives for affordable housing and diluting secondary planning issues (e.g. car parking rates) has historically had limited impact and community opposition. Instead encourage housing choice, for example smaller more affordable housing options with good design outcomes that meet the desired character.
- Planning and Design Code emphasis toward small lot housing and aged care accommodation without looking at other housing and living options (e.g. laneway, dependent accommodation and accessory housing on the same lot as the main dwelling)
- No reference to 'Adaptive Reuse' which is important for ageing in place and providing housing choice
- A potential conflict with other policies (eg. 'Biodiversity/tree cover', 'WSUD' and 'Cultural Heritage').

7. Cultural Diversity

- Important policy to recognise, identify and protect cultural heritage
- Limited content compared to other policies and therefore suggests its level of importance is lower. '
- Add recognition of the importance of built heritage to the community through embodied energy, tourism and economic contribution
- Potential conflicts with other policy (eg. Housing Supply and Diversity)

8. Strategic Transport Infrastructure

- Fundamental policy for strategic transit orientated development

- Fails to recognise the whole 'link and place' method of integrating and balancing transport and land use
- Fails to acknowledge 'barriers' created by strategic link roads and the impacts on freedom of movement across these areas and sense of isolation created within local communities
- Potential conflicts with other policies (e.g. biodiversity and greening). Potential overlap with 'integrated planning' policy.