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21 September 2018

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Department of Planning, Transport and Infrastructure  
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ADELAIDE SA 5001

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Dear Ms Elding

### **Adelaide Hills Council Submission on the Draft State Planning Policies**

Adelaide Hills Council is grateful for the opportunity to provide feedback on the the Draft State Planning Policies (SPPs) released for community consultation by the State Planning Commission on 16 July 2018.

In preparing this submission a comprehensive review of the Draft SPPs was undertaken including consultation with relevant Council Members and staff.

We wish to highlight that among those consulted there was a strong feeling that many of the SPPs have a Metropolitan Adelaide focus, with limited reference to their applicability to peri-urban and rural areas. Suggested changes to pick up this point in the relevant SPPs have been made below and in the Comment Table provided in **Enclosure A**.

In addition, Council strongly supports the recommendations in the submission provided by the Local Government Association on the Draft SPPs, which we understand has been submitted to DPTI.

### **Support of Intent of SPPs**

At the outset Council would like to acknowledge that the Draft SPPs provide a good platform for a responsive and adaptive planning system, which will inherently support the State's liveability, sustainability and prosperity aspirations.

The general layout and structure of the document is considered highly legible and user friendly, and conveys complex planning issues in a simple manner. As a result the Draft SPP document as a whole appears well considered.

Notwithstanding, there are some themes and policies within the proposed SPP document which are of concern to Council, as outlined further below.

### **Summary of Issues**

With respect to the 11 Ministerial SPP's, there is a degree of uncertainty as to how the rationale for these was decided. It would therefore be beneficial to expand on the reasoning for each particular policy topic to assist practitioners and the general public in understanding the background and context for these policies.

As emphasised earlier, a large percentage of the policies have a Metropolitan Adelaide focus with little reference to their applicability to peri-urban and rural areas. Suggested changes to pick up this point in the relevant policy statements have been made below and are further detailed in **Enclosure A**.

It is unclear how the weighting hierarchy with regard to the Principles of Good Planning (described on Page 14) will interact with the SPPs. It is considered that the SPPs should make it clear when and how the Principles of Good Planning are incorporated into the SPPs.

There appears to be a large degree of inherent conflicts between some policies. Although this is recognised as 'managing competing state policies' (Page 11), it is considered that in general the Draft SPPs pay unsatisfactory attention to this issue and it is unclear how competing policy will be reconciled in practice. For example, there is concern regarding a preference toward a growth bias scenario and how this is to be balanced against outcomes with regard to biodiversity and climate change mitigation. As such it is suggested that where conflict between policies arises that it be addressed within each respective SPP policy. Alternatively, the issue could be addressed by its own standalone policy or an expanded SPP 1: Integrated Planning.

The guidance notes following the objectives and policy sections under each heading are considered a good addition to the Draft SPPs. However, there is potential for these to be expanded to provide greater clarity for policy makers. This could be provided as a standalone document/handbook, which would provide a tool to efficiently distill and link the objectives and policies of the SPPs to Regional Plans and the forthcoming Planning and Design Code.

With respect to the individual SPPs the following excerpts have been taken from the Comment Table (**Appendix A**) and represent a selection of the critical issues with respect to the interests of the Adelaide Hills Council:

#### SPP 1: Integrated Planning

It is considered that an additional policy be included that addresses existing township and peri urban development, outside of the Metropolitan Adelaide context, as little guidance is offered in this regard.

#### SPP 2: Design Quality

It is considered that Policy 2.7 should be adapted to specifically capture non-urban areas, particularly where 'unique township' character exists, such as within the Adelaide Hills and surrounding regions. A performance based approach to assessment in these specific locations would assist in protecting

the distinguishable character of these areas and unlock the economic potential. Therefore additional emphasis is considered necessary in Policy 2.7 to promote this outcome.

#### SPP 3: Adaptive Reuse

While flexible planning requirements that encourage adaptive reuse are supported, it should be acknowledged that the practical implications of allowing dispensations such as reduced car parking, and the potential impacts of particular land uses on surrounding properties, will potentially cause flow on impacts to the surrounding area. It is considered that an additional Policy statement be included to provide a strategic framework in which to reconcile such issues.

#### SPP 4: Biodiversity

It is considered that an additional policy should be included to provide a strategic framework for how the cumulative impact of biodiversity loss or gain from development will be captured. This is pertinent for all development, where currently such tools/measures are not available.

#### SPP 5: Climate Change

Policies under this heading are primarily urban orientated. The significance of Climate Change impacts on rural areas and food production areas needs to be explicitly mentioned e.g. on primary production, fisheries and arable land with a focus on adaption strategies.

#### SPP 6: Housing Supply and Diversity

It is considered that an additional policy statement should be included to capture that in the rural context, 'dual occupancy' or 'second dwelling' (under strictly controlled circumstances) can improve the ability of landowners to implement succession planning and keep farms viable. Although only a limited part of the supply and diversity puzzle, such policy could provide an important function within regional communities and this should be acknowledged in a separate policy statement.

#### SPP 7: Cultural Heritage

It is suggested therefore that an additional policy should be included to acknowledge the need to continue to identify and to protect local and state heritage places and buildings to address this matter.

#### SPP 8: Primary Industry

An additional policy should be inserted to clearly deal with the ability for primary producers to value add to their agricultural produce. This should include allowances for expansion of agricultural industry to allow for making for example of jams, drying of fruit, preserves etc. and allow for retail sales of local produce and associated tourism activities on-site.

The right to farm should also be captured in SPP 8 i.e. to ensure that any identified agricultural areas and land are not impeded for farming activities as a result of proximity to a non-farming use such as residential development. It is considered that Policy 8.4 should be amended to pick up this issue.

#### SPP 9: Employment Lands

While Council supports policies which make change-over of tenancies or businesses easier, it is important to consider whether the new uses will have a different/greater impact than the previous use approved for that site.

#### SPP 10: Key Resources

An additional policy should propose that interface issues be appropriately dealt with and the community be adequately consulted.

#### SPP 14: Water Security and Quality

Emerging technologies can assist in ensuring water quality is maintained and the policy could acknowledge this more fluently. As such it is considered paramount that the planning framework move away from a criteria/land use based approach, to a more performance based approach, to ensure protection of water quality whilst allowing for innovation and value adding activities within the water supply catchments. The SPP 14 should capture this via an additional policy statement.

#### SPP 15: Natural Hazards

It is suggested that bushfire protection be captured in a specific policy statement, in order to give emphasis to this significant hazard, especially in the Adelaide Hills which is considered to be the most densely populated bushfire prone area in the State.

For a comprehensive review of each SPP, including additional comments and suggested changes please refer to the Comment Table provided as **Enclosure A**.

In summary, the Adelaide Hills Council is supportive of the high level intent of the Draft State Planning Policy document and looks forward to having the suggestions as tabled in this submission reviewed and included where appropriate in the final version.

If you have any queries regarding the above comments then please do not hesitate to contact Marc Salver, Director Development and Regulatory Services on [REDACTED].

Yours sincerely



**Andrew Aitken**  
**Chief Executive Officer**

Enc: Appendix A – Adelaide Hills Council – Comment Table on the Draft State Planning Policies

cc: Stephen Smith - Local Government Association

**Adelaide Hills Council**  
**Comment Table**  
**Draft State Planning Policies**  
**South Australia**

# State Planning Policy 1: Integrated Planning



<p><b>Objective</b> Integrated planning is an essential approach for liveability, growth and economic development, maximising the benefits and positive long-term impacts of development and infrastructure investment.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"> <li>1. Plan growth in areas of the state that are connected to, integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions.</li> <li>2. Ensure that areas of rural, landscape, environmental or food production significance within Greater Adelaide are protected from urban encroachment as provided for by the Environment and Food Production Areas legislation.</li> <li>3. Provide an adequate supply of land outside the Environment and Food Production Areas that can accommodate housing and employment growth over the relevant forecast period. Based on current dynamics, the relevant forecast period is considered to be 10 years.</li> <li>4. Manage growth in an orderly sequence to enable the cost-effective and timely delivery of investment in infrastructure commensurate with the rate of population growth into the future.</li> <li>5. Plan for urban growth to protect and preserve opportunities for high value horticulture, tourism and landscape character areas.</li> <li>6. Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.</li> <li>7. Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced car parking to encourage greater use of active transport options such as public transport, walking and cycling.</li> <li>8. Support metropolitan Adelaide as a predominantly low to medium rise city, with high-rise focussed in the CBD, parts of the Park Lands Frame, significant urban boulevards and other strategic locations where the interface with lower rise areas can be managed.</li> </ol>	<p><b>What We Support</b> State Planning Policy (SPP) 1 as a fundamental State policy that acts as an overarching policy that sets the scene for the other SPPs that follow is supported.</p> <p>We support policies 1.2 and 1.5 which will ensure strong protection for the Adelaide Hill’s most vital assets (i.e. its primary production land and scenic landscapes) from urban encroachment, by reinforcing the Environment and Food Production Area (EFPA) legislation and the associated economic development opportunities that our rural lands present for primary production and tourism activities.</p> <p><b>Suggested Changes</b> Policy 1.3 promotes the supply of land outside the Environment and Food Production Areas for housing and employment growth. Given the potential flooding and bushfire hazards within the Adelaide Hills areas, and other areas in the State, consideration should be given to the inclusion of a ‘where appropriate’ caution in the policy statement.</p> <p>It is considered that Policy 1.6 could be taken to suggest that all given neighbourhoods ought to be regenerated. It is therefore suggested that the policy statement be changed to clarify that this only occur in selected neighbourhoods i.e.: 'Enable the regeneration and renewal of selected neighbourhoods (informed by Regional Planning) to provide...'</p> <p>In addition, Policy 1.6 would benefit from the inclusion of ‘adaptive housing’ to further promote innovative solutions to provide for a diverse range of housing including for example reuse/conversion of disused commercial or industrial buildings for residential use.</p> <p>Lastly, it is considered that an additional policy statement be included that addresses existing townships and development in peri urban and regional areas outside of the metropolitan Adelaide as little guidance is offered in this regard by this SPP.</p>
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# State Planning Policy 2: Design Quality



<p><b>Objective</b> The Principles of Good Design are embedded within the planning system to elevate the design quality of South Australia’s built and natural environment and public realm.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Ensure plans encourage development that incorporates the Principles of Good Design.</li><li>2. Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design, Access for All, Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design.</li><li>3. Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity.</li><li>4. Ensure design advice is considered early in the planning process for complex developments and utilises consistent and credible processes (such as a Design Review) to ensure better outcomes.</li><li>5. Promote a culture of good design to foster creative thinking, innovation and effective design processes within the planning industry, allied fields and general public.</li><li>6. Provide high quality, functional and accessible public green spaces and streetscapes, particularly in areas with increasing infill development, housing diversity, population growth, medium to high residential densities and urban renewal.</li><li>7. Prioritise performance based design quality outcomes in Adelaide City; heritage and character areas; places where medium-rise buildings interface with lower-rise development; mixed-use renewal precincts; transit corridors; and iconic locations that attract high levels of pedestrian activity and/or tourism.</li><li>8. Enable quality design solutions in the planning and design code for low-medium density development.</li></ol>	<p><b>What We Support</b> SPP 2 as a fundamental State policy that promotes the Principles of Good Design to establish clear benchmarks and to encourage a culture of good design awareness within the development industry is supported.</p> <p><b>Suggested Changes</b> Policy 2.2 appears to be somewhat disjointed due to inclusion of Crime Prevention through Environmental Design with Environmentally Sustainable Design and Water Sensitive Urban Design. These as a group do not directly achieve the goal of access and inclusion planning. These concepts are all of high importance, and it is considered that they should be placed in a separate policy statements or included in a revised Policy 2.3 for clarity and emphasis.</p> <p>It is considered that Policy 2.4 should promote early design advice for all development and not just complex development. It is considered that in order to raise the design standards across the development industry, that early design advice and collaboration is essential for a large majority of development, not just the most complex. Therefore Policy 2.4 should be amended to capture this desired outcome.</p> <p>For complex State assessed development applications the early and meaningful engagement with Local Government is considered essential to ensure local issues are addressed resulting in good planning outcomes all round. It is therefore suggested that an additional policy statement be included to promote Local Government consultation at the design phase for complex developments.</p> <p>It is considered that Policy 2.7 should be adapted to specifically capture non-urban areas, particularly where ‘unique township’ character exists, such as within the Adelaide Hills and surrounding regions. A performance based approach to assessment in these specific locations would assist in protecting the distinguishable character of these areas and unlock the economic potential. Therefore additional emphasis is considered necessary in Policy 2.7 to promote this outcome.</p>
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# State Planning Policy 3: Adaptive Reuse

<p><b>Objective</b> The adaptive reuse of existing buildings accommodates new and diverse uses.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Remove barriers and encourage innovative and adaptive reuse of underutilised buildings and places to inspire urban regeneration, stimulate our economy and unlock latent investment opportunities.</li><li>2. Sponsor models of adaptive reuse that allow flexible access to public spaces and infrastructure.</li><li>3. Enable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our states history.</li><li>4. Prioritise the adaptive reuse of buildings within the City of Adelaide and other mixed-use precincts.</li><li>5. Facilitate the conversion and adaption of existing commercial office buildings in the City of Adelaide for residential or mixed-use.</li><li>6. Provide a range of planning and development incentives and bonus schemes to streamline decision-making processes, provide dispensation on prescriptive requirements that constrain opportunities, and capitalise on related regulatory or financial incentives outside of the planning system.</li><li>7. Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health and safety.</li></ol>	<p><b>What We Support</b> SPP 3 as a fundamental State policy that supports the idea of adaptive reuse to encourage the retention of buildings (both heritage and non-heritage) is supported.</p> <p><b>Suggested Changes</b> While flexible planning requirements that encourage adaptive reuse are supported, it should be acknowledged that the practical implications of allowing dispensations such as reduced car parking, and the potential impacts of particular land uses on surrounding properties, will potentially cause flow on impacts to the surrounding area. It is considered that an additional policy statement be included to provide a strategic framework in which to reconcile such issues.</p> <p>It is considered that to avoid inappropriate outcomes for heritage buildings that an adaptive re-use framework should set out clear expectations for heritage buildings within a heritage hierarchy. A good example is that what would be accepted for a building of local significance might not be appropriate for a building of state significance or vice versa. An additional policy statement or an amended to Policy 3.3 should address this issue to ensure appropriate adaptive re-use outcomes are achieved in heritage buildings.</p>
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# State Planning Policy 4: Biodiversity



<p><b>Objective</b> Biodiversity is valued and conserved, and its integrity within natural ecosystems protected.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"> <li>1. Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat.</li> <li>2. Minimise the loss of biodiversity, where possible, in accordance with the mitigation hierarchy:             <ol style="list-style-type: none"> <li>a) Avoidance - avoid impacts on biodiversity</li> <li>b) Minimisation - reduce the duration, intensity and/or extent of impacts</li> <li>c) Rehabilitation/restoration - improve degraded or removed ecosystems following exposure to impacts.</li> </ol> </li> <li>3. Recognise that modified landscapes have environmental value and that development should be compatible with these values.</li> <li>4. Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for conserving the natural values of that landscape.</li> </ol>	<p><b>What We Support</b> SPP 4 as a fundamental State policy that sets a high level strategic framework to preserve biodiversity is supported.</p> <p><b>Suggested Changes</b> It is considered that the Objective should promote biodiversity rehabilitation/restoration, particularly where severe biodiversity loss has occurred in ecosystems due to development. The Objective should therefore be amended to capture this issue.</p> <p>It is considered that an additional policy statement be inserted that provides a framework for how landscapes that have environmental values (biodiversity) should be measured (e.g. establishing a site specific or regional evidence base). Such information would be critical in achieving the effective implementation of the mitigation hierarchy approach as set out in Policy 4.2.</p> <p>It is considered that an additional policy should be included to provide a strategic framework for how the cumulative impact of biodiversity loss or gain from development will be captured. This is pertinent for all development, where currently such tools/measures are not available.</p> <p>It is considered that an additional policy should acknowledge the need to promote an adaptive approach toward rehabilitation/restoration in a changing climate. Such a policy would clearly acknowledge the potential impacts of Climate Change on local biodiversity, and provide an adaptive framework for ensuring biodiversity is maintained and enhanced. For example there is evidence that suggests that using native plants from more arid climates in the north of the State, when offsetting the loss of native plants in the southern areas of the State may be a more appropriate climate adaptive response. Such a policy would ensure that biodiversity is seen as an evolving process, where adaptive approaches to increasing biodiversity are contemplated in a changing climate.</p>
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# State Planning Policy 5: Climate Change



<p><b>Objective</b> Our greenhouse gas emissions are reduced and development that is climate-ready is promoted so that our economy, communities and environment will be more resilient to climate change impacts.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"> <li>1. Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.</li> <li>2. Ensure the design of public places increases climate change resilience and future liveability.</li> <li>3. Ensure the development of climate-smart buildings that reduce our demand for water and energy and mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure, urban greening and tree canopy enhancement.</li> <li>4. Avoid development in hazard-prone areas or, where unavoidable, ensure risks to people and property are mitigated to an acceptable or tolerable level through cost-effective measures.</li> <li>5. Facilitate green technologies and industries that reduce reliance on carbon-based energy supplies.</li> <li>6. Protect areas that provide biodiversity and maximise opportunities for carbon sequestration.</li> <li>7. Ensure decision-making considers the impacts of climate change using the best available information on climate risk which is regularly reviewed and updated.</li> <li>8. Support development that does not contribute to increasing our vulnerability or exacerbating the impacts of climate change and which makes the fullest possible contribution to mitigation.</li> </ol>	<p><b>What We Support</b> SPP 5 as a fundamental State policy that supports a strategic planning framework that can materially influence a reduction in greenhouse gas emissions.</p> <p>We are supportive of the approach to use the best available climate science to inform adaptation measures to ensure a responsive planning framework is established across the state.</p> <p><b>Suggested Changes</b> It is considered that the Objective should be more ambitious with respect to emissions reduction. For example it is possible that future legislation may mandate carbon neutrality within the built environment. Such a high ambition should be more broadly captured and promoted by the Objective.</p> <p>It is considered that the Policies in this section are primarily urban orientated and the significance of Climate Change impacts on regional and rural areas, including the primary production areas, should also be captured. In particular reference should be made in a separate policy statement that the impact of Climate Change on primary production and arable land presents a significant risk to the economic base of regions and food security within the State. There is therefore a need for policy to provide an adaptive framework to minimise such impacts on such rural and regional areas.</p> <p>It is considered that Policy 5.3 is confusing, in that it is unclear whether it is aimed at the individual allotment or at the broader neighbourhood scale. It is suggested that this Policy clarify this and make a clear distinction between individual lot and neighbourhood scale implementation of these design approaches. In addition, the promotion of ‘passive design’ or ‘Ecological Sustainable Design’ should be also be included in the Policy statement as this concept is directly linked to ‘climate-smart buildings’.</p> <p>Policy 5.4 should include reference to ‘using best available climate science’ to ensure it remains responsive to such science or it could be combined with Policy 5.7 to avoid duplication.</p> <p>It is considered that the potential outcomes related to Policy 5.8, should be further promoted. This could be achieved if the term ‘support’ was replaced with ‘incentive’, as it is considered that such terminology would set a mandate for the Planning &amp; Design Code development that offers direct incentives for development that is climate responsive.</p>
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# State Planning Policy 6: Housing Supply and Diversity



<p><b>Objective</b> A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Enable the provision of a well-designed, diverse and affordable housing supply that responds to population growth and targets, and the evolving demographics and lifestyle needs of our current and future communities.</li><li>2. Ensure there is a timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.</li><li>3. Support regional centres and town growth and the demand for increases in housing supply within the existing town footprint or outside towns where there is demonstrated demand and it is contiguous with the existing development area.</li><li>4. Promote residential and mixed-use development in centres and corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.</li><li>5. Provide a permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.</li><li>6. Increase the amount and diversity of residential accommodation in Adelaide City to support a variety of household types for a range of age and income groups, including students, professionals and the ageing.</li><li>7. Enable and encourage the provision of Affordable Housing through incentives such as planning policy bonuses or concessions (e.g. where major rezonings are undertaken that increase development opportunities).</li><li>8. Support the creation of healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.</li></ol>	<p><b>What We Support</b> SPP 6 as a fundamental State policy that focuses on providing a diverse and affordable housing supply that is responsive to changing demographics is supported.</p> <p><b>Suggested Changes</b> Policy 6.3 suggests that increased housing supply be supported outside existing township boundaries where demand and expansion is contiguous. It is considered that additional text should be inserted in this Policy to caution against such development as it would potentially threaten the viability of adjoining primary production areas.</p> <p>Policy 6.5 promotes an enabling policy environment for small lot housing. This is supported but only where development is sensitively integrated and responds appropriately to the existing character of a locality. It is considered that Policy 6.5 should be amended to capture this point.</p> <p>Policy 6.6 is considered to have a Metro Adelaide focus. It is considered that this Policy be amended to have state wide application for all urban and township (including rural town) settings.</p> <p>It is considered that an additional policy statement should be included to capture that in the rural context, 'dual occupancy' or 'second dwelling' (under strictly controlled circumstances) can improve the ability of landowners to implement succession planning and keep farms viable. Although only a limited part of the supply and diversity puzzle, such policy could provide an important function within regional communities and this should be acknowledged in a separate policy statement.</p>
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# State Planning Policy 7: Cultural Heritage



<p><b>Objective</b> Places of cultural heritage significance and heritage areas are conserved for the benefit of our present and future generations.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Support and promote the sensitive and respectful use of our culturally and historically significant places.</li><li>2. Recognise and protect Indigenous cultural heritage sites and areas of significance.</li></ol>	<p><b>What We Support</b> SPP 7 as a fundamental State policy that provides a foundation to protect our distinct cultural heritage, identity, and tourism opportunities etc. is supported.</p> <p><b>Suggested Changes</b> It is considered that, based on a comparative analysis of the other SPPs that inadequate acknowledgment of this important issue and the opportunities cultural heritage presents from an economic development point of view has been made in this instance. It is suggested therefore that an additional policy should be included to acknowledge the need to continue to identify and to protect local and state heritage places and buildings to address this matter.</p> <p>It is further considered that an additional policy should include specific recognition of the importance of built heritage that reflects the distinct and diverse community identity and historical legacies within communities and the state more broadly.</p> <p>Lastly, it is considered an additional policy should provide recognition of the benefit and complementary value of preserving historic buildings (and areas), particularly in terms of embedded energy/resources, uniqueness, tourism attraction and economic contribution etc.</p>
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# State Planning Policy 8: Primary Industry



<p><b>Objective</b> A diverse and dynamic primary industry sector making the best use of natural and human assets.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.</li><li>2. Create local conditions that support new and continuing investment in primary industry while seeking to promote co-existence with adjoining primary industries and avoid land use conflicts.</li><li>3. Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction, and restructuring.</li><li>4. Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.</li></ol>	<p><b>What We Support</b> SPP 8 as a fundamental State policy that appropriately recognises the importance of Primary Industry with respect to the State's prosperity is supported.</p> <p>The introduction acknowledges the increased demands, and community and legislative expectations, and highlights the volatility of markets in which the sector operates, highlighting the need for policy to be flexible in this instance thereby allowing primary producers to adapt to changing market conditions.</p> <p><b>Suggested Changes</b> It is considered that an additional policy should be provided to clearly deal with the ability for primary producers to value add to their agricultural produce. This should include allowances for expansion of agricultural industry to allow for making for example of jams, drying of fruit, preserves etc. and allow for retail sales of local produce and associated tourism activities on-site.</p> <p>It is considered that the right to farm should also be acknowledged via a separate policy statement or by amending Policy 8.4 to ensure that any identified agricultural areas not be impeded for farming activities as a result of proximity to a non-farming use such as residential development.</p> <p>It is further considered that the friction between innovation (e.g. value adding in primary production areas) and watershed protection (e.g. water security requirements in Watershed areas) should also be acknowledged via a policy statement. This issue presents a conflict which requires innovative policy in and of itself to ensure a balance is achieved for both these key matters. Such an approach would enable farmers to determine the viable size and capacity of developments on their land whilst still ensuring that water quality in the watershed is maintained or improved. As such, rather than using a blunt tool to limit the size and capacity of developments (e.g. cellar doors and restaurants), an additional policy should be provided to promote a performance based approach to the assessment of such development and their impacts on water quality.</p>
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# State Planning Policy 9: Employment Lands



<p><b>Objective</b> Employment lands are protected from encroachment by incompatible development and are supported by appropriate transport systems and infrastructure.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"> <li>1. Enable opportunities for employment that are connected to, and integrated with, housing, infrastructure, transport and essential services.</li> <li>2. Support state-significant operations and industries and protect them from encroachment by incompatible and/or more sensitive land uses.</li> <li>3. Support and promote adaptable policies that allow employment markets to evolve in response to changing business and community needs.</li> <li>4. Promote new, latent and alternative employment by enabling a diverse range of flexible land use opportunities.</li> <li>5. Protect prime industrial land for employment use where it provides connectivity to freight networks; enables a critical mass or cluster of activity; has the potential for expansion; is connected to skilled labour; is well serviced; and is not constrained by abutting land uses.</li> <li>6. Allow for competition within the retail sector by providing an appropriate supply of land for all retail formats in areas that are accessible to communities.</li> <li>7. Support sustainable tourism where the social, cultural and natural values underpinning the tourism developments are protected to maximise economic growth.</li> <li>8. Strengthen the primacy of the city centre as the cultural, entertainment, tourism and economic focus of Greater Adelaide. Enhance its role as the centre for peak legal, financial and banking services, specialty health and medical services, higher education, the arts, and high-quality specialty retailers that contribute to Adelaide City's attributes as a destination.</li> <li>9. Encourage the development of vibrant employment and residential mixed-use precincts where conflicts between uses can be managed.</li> <li>10. Plan for employment and industrial precincts that improve economic productivity, are protected from encroachment, connect to efficient supply chains, and minimise transport impacts on existing communities.</li> </ol>	<p><b>What We Support</b> SPP 9 recognises that it is important to provide a range of employment options and recognises the need to reserve land in order to facilitate this (e.g. land accommodating industrial activities, innovative technologies, different types of retailing etc.).</p> <p><b>Suggested Changes</b> It is considered that the Objective is not clear with regard to the definition of "employment lands", and as such the meaning and implementation of this policy would be strengthened by including a useful definition.</p> <p>It is considered critical that policy promoting a flexible approach to the change of use to business purposes be included in this instance. Such policy should also acknowledge that where new uses will have a different/greater impact than the previous approved use, that these impacts be appropriately mitigated. It is considered that Policy 9.2 or 9.3 be amended to capture this point.</p> <p>In Policies 9.9 and 9.10 there is a focus on the establishment of well-connected vibrant and innovative employment precincts. It should be acknowledged that in regional settings opportunities for such clustering is limited; however, innovation still emerges and should be fostered through appropriate policy. For example the establishment of multiple distilleries and micro-breweries in the Adelaide Hills has emerged as a burgeoning industry that has not been reliant on the need for clustering. It is therefore considered that a more performance based approach to the assessment of such developments where clustering is not possible should be promoted by amending Policy 9.9 or 9.10 to address this issue.</p>
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# State Planning Policy 10: Key Resources



<p><b>Objective</b> Key resources continue to contribute to our state’s economy and provide valued employment opportunities.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Define and protect mineral resources operations, associated infrastructure and undeveloped mineral resources from encroachment by incompatible land uses.</li><li>2. Plan for and implement development in the vicinity of undeveloped energy resources, energy resources operations and associated infrastructure to ensure their ongoing safe and efficient operation.</li><li>3. Identify and maintain strategic transport corridors and other key infrastructure required to support resource sector activities and their supply chains.</li></ol>	<p><b>What We Support</b> SPP 10 as a fundamental State policy is supported.</p> <p><b>Suggested Changes</b> It is considered that an additional policy should be included to ensure that long term economic benefits and interface issues relating to resource development/mining are appropriately considered and dealt with, and that the neighbouring community is adequately consulted in such instances. There are examples interstate where coal seam gas exploration and extraction has been progressed on the grounds of long term economic outcomes but against the will of local communities. Elevating such development in certain circumstances has led to the undermining of competing primary industry activities. These potentially sensitive conflicts with respect to resource extraction should be captured by an additional policy in order to address potential conflicts between primary industry and mining.</p> <p>It is also suggested that an additional policy should acknowledge the fundamental conflict between fossil fuel extraction/use and climate change mitigation.</p> <p>It is considered that an additional policy be included to promote the importance of site remediation work following the decommissioning of mine sites.</p>
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# State Planning Policy 11: Strategic Transport Infrastructure



<p><b>Objective</b> Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and business.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Enable an efficient, reliable and safe transport network connecting business to markets and people to places (i.e. where they live, work, visit and recreate).</li><li>2. Promote development that maximises the use of existing and planned investment in transport infrastructure and services.</li><li>3. Enable equitable contribution towards the provision of transport infrastructure and services to support land and property development.</li><li>4. Support the long-term sustainability and management of transport assets and the various modes that use these assets.</li><li>5. Minimise negative transport-related impacts on communities and the environment.</li><li>6. Enable and encourage the increased use of a wider variety of transport modes including public transport, walking and cycling to facilitate a reduced reliance on private vehicle travel.</li><li>7. Allow for the future expansion and intensification of strategic transport infrastructure and service provision (corridors and nodes) for passenger and freight movements.</li><li>8. Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).</li><li>9. Enable development that is integrated with and capitalises on existing and future transport functions of transport corridors and nodes.</li><li>10. Plan development to take advantage of emerging technologies, including electric and alternative fuel vehicles, autonomous vehicles and on-demand transport opportunities.</li></ol>	<p><b>What We Support</b> SPP 11 as a fundamental State policy for identifying, protecting and planning good function and movement is supported.</p> <p><b>Suggested Changes</b> It is considered that transport infrastructure priority should be balanced with land use outcomes. For example there are circumstances where the 'place' function, e.g. main streets, should have priority and influence location or status of transport infrastructure provision. It is considered that this important issue be captured by an additional policy statement.</p> <p>It is also considered that Policies 11.2 and 11.9 are very similar and could be combined, or better defined if they are distinct issues.</p>
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# State Planning Policy 12: Energy



<p><b>Objective</b> The ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Support the development of energy assets and infrastructure which are able to manage their impact on surrounding land uses, and the natural and built environment.</li><li>2. Support and promote alternative sources of energy supply at the neighbourhood level.</li><li>3. Facilitate access to strategic energy infrastructure corridors to support the interconnection between South Australia and the National Electricity Market.</li><li>4. Ensure development in the vicinity of major energy infrastructure locations and corridors (including easements) is planned and implemented in such a way as to maintain the safe and efficient delivery and functioning of the infrastructure.</li><li>5. Ensure renewable energy technologies support a stable energy market and continued supply and do not adversely affect the amenity of regional communities.</li></ol>	<p><b>What We Support</b> SPP 12 as a fundamental State policy is supported.</p> <p><b>Suggested Changes</b> It is considered that an additional policy should acknowledge the transition that is likely to take place to 100% renewable energy over the next century.</p> <p>Policy 12.5 points to the perceived amenity impacts of renewable energy. It is therefore considered that an additional policy should be included to ensure fair balance is achieved between consideration to the impacts from non-renewable energy sources on human health and contribution to climate change and that these are mitigated.</p> <p>It is further considered that the latent opportunity that new technologies provide in the energy sector should be captured by an additional policy statement. For example micro grid advancement will potentially allow whole towns and rural settlements to achieve energy independence. It is considered that this has potential economic benefits not just for residents and communities but also industry and regions more broadly and this opportunity should be captured in an additional policy statement.</p>
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# State Planning Policy 13: Coastal Environment



<p><b>Objective</b> Protect and enhance the coastal environment and ensure that development is not affected by coastal hazards.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Ensure development is not at risk from current and future coastal hazards (including coastal flooding, erosion, inundation, dune drift and acid sulphate soils) consistent with the hierarchy of avoid, accommodate and adapt.</li><li>2. Balance social and economic development outcomes in coastal areas with the protection of the environment.</li><li>3. Protect and enhance the natural coastal environment and its resilience to a changing climate, including environmentally important features, such as mangroves, wetlands, sand dunes, cliff tops, native vegetation and important habitats.</li><li>4. Locate development in areas that are not subject to coastal hazards unless the development requires a coastal location and suitable hazard mitigation strategies are in place, taking into account projected sea level rise and coastal retreat.</li><li>5. Facilitate sustainable development that requires a coastal site, including eco-tourism, aquaculture, marinas and ports, in areas adjoining the foreshore, where environmental impacts can be managed or mitigated.</li><li>6. Maintain or enhance the scenic amenity of important natural coastal landscapes, views and vistas.</li><li>7. Ensure development maintains and enhances public access to coastal areas with minimal impact on the environment and amenity.</li><li>8. Locate low intensity recreational uses where environmental impacts on the coast will be minimal.</li></ol>	<p><b>What We Support</b> SPP 13 as a fundamental State policy is supported.</p> <p><b>Suggested Changes</b> No suggested changes.</p>
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# State Planning Policy 14: Water Security and Quality



<p><b>Objective</b> South Australia’s water supply is protected from the adverse impacts of development.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Provide for the protection and security of the state’s water supply to support a healthy environment, vibrant communities and a strong economy.</li><li>2. Prioritise the protection of water supply catchments including:<ol style="list-style-type: none"><li>a) The Mount Lofty Ranges Watershed</li><li>b) Water Protection Areas under the Environment Protection Act 1993</li><li>c) The River Murray Protection Area under the River Murray Act 2003</li><li>d) Prescribed water resources and wells under the Natural Resources Management Act 2004.</li></ol></li><li>3. Provide for infrastructure and land use policy that aims to decrease flood risk and improve water quality and urban amenity.</li><li>4. Ensure our water supply, stormwater and wastewater infrastructure meets the needs of a growing population and economy while balancing environmental outcomes.</li></ol>	<p><b>What We Support</b></p> <p>SPP 14 as a fundamental State policy that recognises the role of water in supporting premium food and wine industries important in the Mt Lofty Ranges context is supported.</p> <p>The diversification of water supplies is seen as a positive step, given Metropolitan Adelaide’s reliance on the Mt Lofty Ranges Watershed Area, providing 60% of water supply.</p> <p>An integrated approach to water resource management is also supported, recognising land use planning’s role in leveraging synergies between flood mitigation, water quality protection and amenity.</p> <p><b>Suggested Changes</b></p> <p>It is suggested that the conflict between traditional water protection measures and development in Watershed Areas be addressed. This conflict is most evident where primary producers tend to be discouraged from undertaking value adding opportunities under the current policy regime due to the non-complying triggers for development in the Watershed Area. It is considered that an additional policy be included which acknowledges the emerging technologies that can assist in ensuring water quality is maintained whilst allowing such value adding developments to occur.. To this end, it is considered critical that policy moves away from a criteria/land use based approach, to a more performance based approach, to ensure protection of water quality whilst allowing for innovation and value adding activities within the water supply catchments. An additional policy statement should be included to capture this issue.</p> <p>It is considered that reference should be made to Water Sensitive Urban Design best practice and this could be achieved through a slight amendment to Policy 14.3.</p>
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# State Planning Policy 15: Natural Hazards



<p><b>Objective</b> Communities and developments are protected from the adverse impacts of natural hazards.</p> <p><b>Policies</b></p> <ol style="list-style-type: none"><li>1. Identify and minimise the risk to people, property and the environment from exposure to natural hazards including bushfire, terrestrial and coastal flooding, erosion, dune drift and acid sulphate soils.</li><li>2. Design and plan for development in accordance with a risk hierarchy of avoidance, adaptation and protection.</li><li>3. Locate critical infrastructure such as hospitals, telecommunications, transport systems and energy and water services in areas that are not exposed to risk from natural hazards.</li><li>4. Mitigate the impact of extreme heat events by designing public spaces and developments to create cooler micro-climates through the use of green infrastructure.</li><li>5. Protect key coastal areas and critical infrastructure at risk from sea level</li></ol>	<p><b>What We Support</b> SPP 15 as a fundamental State policy that acknowledges Climate Change is likely to cause an increased likelihood of extreme weather events including extreme heat, storm, bushfire and flooding events is supported.</p> <p><b>Suggested Changes</b> It is considered that an additional policy be included that acknowledges that land use planning plays a critical role in mitigating the risks associated with natural hazards.</p> <p>It is also suggested that a separate policy statement be included to acknowledge the need for bushfire protection/mitigation, in order to give emphasis to this significant hazard.</p> <p>It is also considered that an additional policy statement should be included to acknowledge the need for development, located to minimise the threat and impact of bushfires on life and property, to also protect natural and rural character through appropriate design measures, particularly in scenic areas.</p> <p>It is further considered that the policies do not explicitly restrict encroachment of urban or township development into high risk hazard areas. This should be addressed via an additional policy statement.</p> <p>It is suggested that proposed hazard overlays capture specific high risk flooding and bushfire areas (e.g. Gawler River Floodplain, Mount Lofty Ranges Bushfire Risk Area) given the potential impact of these natural hazards to relatively large populations who reside within these areas.</p>
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# State Planning Policy 16: Emissions and Hazardous Activities



<p><b>Objective</b> Communities and the environment are protected from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.</p> <p><b>Policies</b> 1. Ensure our communities and the environment are protected from risks associated with emissions and radiation activities while ensuring that industrial and infrastructure development remains viable through:</p> <ul style="list-style-type: none"><li>a) Ensuring appropriate zoning and mixed uses are compatible</li><li>b) Avoiding establishing incompatible land use interfaces through encroachment on industrial sites by maintaining adequate separation distances</li><li>c) Incorporating engineering controls into building design where emissions or impacts are unavoidable</li></ul> <p>2. Ensure risk posed by known or potential contamination of sites is adequately assessed and managed to enable the appropriate development and safe use of land.</p>	<p><b>What We Support</b> SPP 16 as a fundamental State policy that recognises the risk of hazardous activities relating to industrial development is supported.</p> <p><b>Suggested Changes</b> No suggested changes.</p>
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