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11 September 2018

Mr T Anderson QC
State Planning Commission
PO Box 1815
Adelaide SA 5001

Dear Sir

Submission concerning the Draft State Planning Policies

Please be advised that at its meeting on 3 September 2018 the Council endorsed the attached submission concerning the draft State Planning Policies currently on consultation.

Yours sincerely,

Nigel Litchfield
Manager Planning Services

Submission to the Department Planning Transport and Infrastructure concerning the Draft State Planning Policies.

<p>Overall Summary</p>	<p>Campbelltown Council consider that the current planning policies that were implemented by the previous State government are not working and have resulted in undesirable outcomes for our council area. We urge the State Government to work closely with our council to overcome the deficiencies of the current Campbelltown Development Plan.</p> <p>The overall the policies proposed, seem to represent a sensible approach to the orderly and sustainable development of the State taking into account, population growth, changing demographics, climate change and economic development.</p> <p>Council appreciates, that the detail that is yet to be incorporated into the policy, will have a massive effect on its workability and that the undesirable outcomes that Campbelltown is currently exhibiting need to be taken into consideration.</p> <p>Council do not consider that there are any broad areas of policy missing from the document however they do have concerns that there is a lack of acknowledgement of the nuance that will be required to implement these policies at the local level and no mention of the process by which competing policies will be prioritised in a locality.</p> <p>In addition Council considers that the policies has a metro-centric 'feel' and more work needs to be done to ensure that the policies are truly state wide in their scope.</p>
<p>Policy 1 – Integrated Planning</p>	<p>It acts like an overarching policy that sets the scene for the 15 other policies that follow</p> <p>The p. 21 reference to '<i>medium density</i>' in middle suburbs and master planned communities is too arbitrary especially for established suburbs that have a low density character.</p> <p>Rewrite to '<i>low or medium density</i>'</p> <p>Policy no. 1 to '<i>Plan growth in areas of the state that are connected to, integrated with...existing and proposed transport routes</i>' is arbitrary. Some parts of the state (close to existing transport routes) may be ill- suited for further growth. For example, Semaphore Road meets the 'transport route' criteria of the 30-Year Plan, but has an established character that may be eroded through additional growth (i.e. infill development)</p> <p>Consider deleting the policy, or making it more tailored and less arbitrary</p> <p>Policy no. 6 to '<i>Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities</i>' is likewise too arbitrary. Read literally, it could suggest that all given</p>

	<p>neighbourhoods ought to be regenerated Rewrite to '<i>Enable the regeneration and renewal of selected neighbourhoods (informed by Regional Planning) to provide...</i>' Policy no. 7 to '<i>Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced carparking...</i>' is likewise too arbitrary. The remainder of the policy seeks to encourage active transport, but this may be unrealistic in areas that can only realistically be accessed by a car. Put another way, the policy overlooks areas that are well served by public transport, but nonetheless experiencing an undersupply of parking.</p> <p>Remove reference to "<i>...with reduced carparking...</i>" Policy no. 8 to '<i>Support metropolitan Adelaide as a predominantly low to medium rise city, with high-rise focussed in the CBD...</i>' is too arbitrary. According to the 30-Year Plan, low-to-medium rise is defined as 1-6 storeys, which is too intense for large sections of suburban Adelaide. The policy could be seen to promote multistorey development by stealth</p> <p>Remove reference to 'predominantly...medium rise' city</p>
<p>Policy 2 - Design Quality</p>	<p>Principles of Good Design are sound but examples of how and where they have been implemented may help their interpretation and application.</p> <p>Promoting best practice is laudable but more consideration needs to be given as to how principles around universal design, sustainability and WSUD can be required to be implemented in specific designs.</p>
<p>Policy 3 - Adaptive Reuse</p>	<p>The policies around adaptive reuse are sensible however where they relate to local or State heritage buildings care needs to be taken to ensure that the heritage value of those buildings is evenly balanced against the flexibility required for reuse.</p>
<p>Policy 4 - Biodiversity</p>	<p>It is noted there does not seem to be any direct referencing in the Policies which relates directly to the greening Targets.</p> <p>It is suggested that this could be included in policy in this section or the section on climate change. It is considered that this is an important inclusion as it would guide policy at the lower level around how individual developments could address the imperative to provide a greener and more pleasant local environment.</p>
<p>Policy 5.- Climate Change</p>	<p>The policies are primarily urban orientated. The significance to rural areas and food production areas needs to be explicitly mentioned eg primary production, fisheries and arable land.</p>

	<p>In policy 1 the notion that a “compact” urban form automatically delivers carbon efficient living environments is unsupported. A badly design compact urban form can create less carbon efficient living environments – remove the word “compact” so that the policy applies to all urban form</p> <p>Another policy is needed to recognize the need for the impacts of climate change to be understood at smaller regional and local scales ie Use science and analysis to understand localised impacts and adaptation responses - as climate change impacts are not geographically uniform.</p> <p>The Non–Statutory Guidance notes are again largely focussed on urban areas without sufficient reference to rural areas.</p> <p>In the Planning & Design Code commentary there needs to be mention of policies that:</p> <ul style="list-style-type: none"> - Address consideration of natural ecosystem impacts eg ecological adaptation corridors and retreat areas, facilitate the phased relocation of assets and infrastructure away from high risk areas. - Recognise the importance of land division design in setting the foundations for built form and opportunities for climate sensitive design (before getting to building code solutions) ensuring that design quality policies are used in the P & D Code as a tool to mitigate risks to people and property In the Related SPPs commentary there are many other relevant SPPs - in fact they are nearly all inter related. -
Policy 6 – Housing Supply and Diversity	More work needs to be done in this section to reference the need to link growth in housing and densities with the provision of infrastructure and utility capacity to ensure orderly development is achieved.
Policy 7 – Cultural Heritage	This policy is very sparse. The policy should provide more guidance on how planning policy will support and promote sensitive and respectful use of culturally and historically significant places. It should also provide greater clarity on the value the State is placing on local heritage and make stronger statements about how that will be picked up in the Planning and Design Code. It is noted that that the existing local heritage lists will be included in the Planning and Design Code.
Policy 8 – Primary Industry	
Policy 9 – Employment Lands	<p>Variety of employment options:</p> <p>The policy recognises that it is important to provide a range of employment options and recognises the need to reserve land in order to facilitate these different employment options (e.g. land accommodating industrial activities, innovative technologies, different types of retailing etc).</p>

	<p>Protection of employment lands from encroachment:</p> <p>The policy recognises that these areas should be “protected from encroachment by incompatible development” (SPP 9 Objective and policy 2). There is increasing pressure for land to be made available for residential development, but it is important to reserve land for commercial activities through appropriate zoning. It is not appropriate to allow an area (particularly an inner metro area) to be dominated by residential development as this will force most commercial activities to relocate to outer-suburban areas. The outward migration of local service activities such as motor repair stations, local food production and packaging etc to outer areas removes the ‘local’ from local services.</p> <p>Accessibility of employment lands:</p> <p>Outward migration of commercial areas often increases the commute times for employees, making these employment opportunities less accessible. It also makes it more difficult to connect the service/product with the customer. This issue is acknowledged by Policy 1 which supports “opportunities for employment that are connected to, and integrated with, housing, infrastructure, transport and essential services”.</p> <p>Managing interface between land uses:</p> <p>Notwithstanding the need for employment lands to be local and accessible, it is also important to ensure there is sufficient buffer between sensitive land uses and higher impacting development – again, this can be achieved through appropriate zoning and is supported by the Objective, Principles 2, 5 & 10 which seek protection from encroachment of incompatible development. Councils are dealing with increasing volumes of local nuisance matters, which would be worsened if the separation between sensitive and impacting developments was reduced.</p> <p>Mixed Use where appropriate:</p> <p>Policies 1, 9 and the non-statutory guidance notes for regional plans identify that some areas are appropriate for mixed use precincts. This is supported in appropriate areas and with the appropriate mix of land uses.</p>
<p>Policy 10 – Key Resources</p>	<p>This policy should probably be renamed more accurately as it pertains specifically to mineral and energy resources and other key resources are covered elsewhere.</p> <p>The policies are quite succinct but cover adequately the relevant intersects between orderly planning and mineral resource and energy recovery around incompatible uses, transport infrastructure and identifying areas of resources early so planning can occur.</p>

<p>Policy 11 – Strategic Transport Infrastructure</p>	<p>Transport infrastructure priority assumed with land use to integrate but there are circumstances where the 'place' function, eg main streets, should have priority and influence location or status of transport.</p> <p>Policies are 'motherhood', 'loose' with no clear structure or hierarchy to expression. Policies 2 and 9 are very similar and could be combined, or better defined if are distinct issues.</p> <p>The policy canvasses broad issues but lacks precision and nuance as described above</p> <p>Apparent focus on major and/or regional type infrastructure but for example fails to be clear about other fundamental metropolitan and township 'strategic transport routes' that are already defined as priority movement and freight routes.</p> <p>Supporting text lists airports but ignores other strategic road, rail etc.</p> <p>The policy fails to recognise whole 'link and place' method of integrating and balancing transport and land use</p>
<p>Policy 12 - Energy</p>	<p>The policies are quite succinct but cover adequately the relevant intersects between orderly planning and the provision of adequate energy infrastructure.</p>
<p>Policy 13 – Coastal Environment.</p>	<p>The broad objective of this policy is sensible however some of the policies seem to be a little at odds with it and caught between supporting development in the coastal environment and protecting it. It is suggested more work needs to be done to provide guidance on how development can coexist with sensitive coastal environments . Policies 1 and 4 don't seem to mesh well together.</p>
<p>Policy 14 – Water Security and Quality</p>	<p>The policies are quite succinct but cover adequately the relevant intersects between orderly planning and the provision of adequate water supply particularly the protection of key water supply catchments.</p>
<p>Policy 15</p>	<p>The policy covers adequately the main natural hazards affecting development of the State however it is considered that more guidance should be provided around bushfire which is considered to pose the most widespread and catastrophic threat to people and property natural hazards mentoned.</p>
<p>Policy 16 - Emissions and Hazardous Activities</p>	<p>It is good to see recognition of hazardous activities (as a result of industrial development), as opposed to merely natural hazards</p> <p>Explicit reference to 'adequate separation distances' good to see - gives a clear suggestion of a spatial/GIS</p>

	<p>approach to resolve such issues.</p> <p>Explicit reference to 'engineering controls' is also also good to see (though it's unclear how this can be expressed at the Regional Planning stage, for example).</p>
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