

From: [REDACTED]
To: [DPTI:Planning Engagement](#)
Subject: DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA
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Over the last week I have been writing and re-writing my response essentially around the issue of "Infill".

I then did a word count of 'infill' in the Policy document and was surprised to find 'infill' used only 7 times in the 72 page Policy document.

Infill is the major strategy for 'containing our urban footprint' and the two target areas that will provide for the 'containment of our urban footprint' are 'greyfields' and 'brownfields', but neither of these two words appear in the Policy document.

'Containment',

The use of the word 'Containing' denotes, to me, the military/medical concept of preventing breakouts, while the battle continues within the area of 'containment'.

It is hard to accept that the rehabilitation of 'brownfields' does not rate a mention in the Policy document. Rehabilitation of the brownfields within the containment area requires a specific policy as to ensure that the "Love Canal" experience is not replicated.

Drilling down further using the number of times key words are used I found the following:

HOUSING 81

TRANSPORT 92 (of which 'public' appears 14 times)

TREES 2

and PLANTS; GARDENS LAWNS SHRUBS VEGETABLES AND FLOWERS are not mentioned at all.

Perhaps this is too pedantic but it does give an insight into the Department's thinking.

The quality and relevance of the information became an even bigger issue with the following statement:

On page: 13 *'recent trends show that a greater number of people are choosing to live closer to the city in varied forms of housing.*

In 2018, approximately 76 per cent of Greater Adelaide's new housing has been infill development within our established metropolitan suburbs.'

The old adage 'statistics, lies and damned lies' resonates at this statement given that the document is dated 'July 2018' rendering the statistic meaningless and as a consequence, other 'statistics' validity.

The above may be a very simplistic approach but 'infill' is the major strategy to 'contain' our 'urban footprint'

Cheers

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