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DPTI

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Department of Planning, Transport & Infrastructure
PO Box 1815
ADELAIDE SA 5001

By Email: DPTI.PlanningEngagement@sa.gov.au

Dear Sir/Madam

RE: Consultation: Draft State Planning Policies for South Australia - Submission

Thank you for providing Council with an opportunity to consider and provide comment on the recently released State Planning Policies (SPPs).

It is recognised that these sixteen (16) policies are the highest order planning policy suite encompassing the entire State and providing a level of policy direction not afforded under the *Development Act, 1993*. Given the importance that the SPPs will play for all regions it is vital that they appropriately capture the many different land use and development matters occurring across South Australia to ensure that they are truly encompassing. To do so, the SPPs need to be fit-for-purpose and of such a nature as to provide a facilitative environment that can be populated by detailed and specific Regional Plans.

It is disappointing to again note that a key document has been released by the Department which has its primary focus on metropolitan Adelaide with only limited reference to those many interests and issues beyond this area. There was an opportunity through this document, as the preeminent strategic planning vehicle, to support strong contextual policy to be introduced by the Regional Plans and in doing so recognise the substantial value that those areas beyond Adelaide play in providing positive social, economic and environmental outcomes.

Council has considered this document and the SPPs in detail and provide the following comments for consideration:

Statutory Referrals

Council supports statutory referrals for direction only as this will ensure greater accountability is provided by State Government Departments when providing input to a Development Application. It has however previously been noted that it is considered important that appropriate guiding documents be made available (e.g. Practice Direction or Practice Guideline/s) to assist in determining thresholds for referral and provide the necessary tools to allow a relevant authority to make an assessment of the relevant impact in the absence of a referral. This is particularly relevant given the role referral bodies play as 'subject matter experts'.

Targets

It is with interest that Council reviewed the Targets nominated in the Discussion Paper, noting that they are, in many cases, taken directly from the 30 Year Plan for Greater Adelaide- 2017 Update. Whilst noting this as a starting place, they are not considered appropriate as the Targets for the delivery of policy as significant as that of the SPPs. As noted above, the SPPs are the highest order planning policy suite for the entire state, and as such are expected to clearly articulate the future direction for the State, with Regional Plans 'slotting in' as the key driver regionally.

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It is considered that the Targets nominated are narrow, continue to be urban focussed and don't actually work to address and deliver the Objectives and Policies of the sixteen (16) SPPs, rather focussing on six (6) areas which drive primarily how we live and move within urban areas. The Targets driving the SPPs need to be broader than this, capturing elements such as primary industry and employment lands growth and diversification, natural hazards etc.

SPP 1 – Integrated Planning

- Policy 2 – the intent of this policy is understood, however there would be merit in expanding this policy to include reference to the Character Preservation Districts (as it references *'ensure that area of rural, landscape...'*).
- Policy 3 – one assumes that this policy seeks to provide for residential and employment development within both the inner, middle and outer suburbs and importantly those areas to the north and south identified as planned urban lands in the 30 Year Plan for Greater Adelaide 2017 Update? Further, given the perceived focus of this policy on the metropolitan area what consideration has been given to townships across the State?
- Policy 5 – this policy could be integrated with Policy 3 to reflect the retention of the Character Preservation Districts and the controls on residential growth within these areas of landscape character value.

SPP 3 – Adaptive Reuse

- General – This intent policy is supported as, in partnership with other enabling measures, it has the potential to deliver positive outcomes across regional township main streets and district/town centres where many underutilised buildings are located. It is however noted that one of the major impediments to delivering effective adaptive reuse of not only historical buildings is the cost associated with complying with the Building Code of Australia and provision of appropriate disability access, safe access/egress etc. One means of addressing this could be through suitable financing options, such as an expansion of the State Government's *Building Upgrade Finance* program. This program currently provides for disability access upgrades in historical buildings, however there is the potential to expand this program to allow for the adaptive reuse of the underutilised and abandoned buildings which take pride of place in many main streets and district/town centres across the State.
- Policy 6 – Council note the proposal to introduce planning and development incentives and bonus schemes to facilitate adaptive reuse. Whilst understood this approach would need to be carefully monitored and limited in its application, perhaps through an overlay of identified 'Adaptive Reuse Areas' for instance.

SPP 7 – Cultural Heritage

- Objective – Council supports the conservation and protection of those places and areas which retain largely intact character and heritage value, however also note the value in providing a facilitative environment which allows for diversification where the historic fabric may not be as pristine or where a mixed character has developed.

SPP 8 – Primary Industry

- General – Council recognises and has participated in State Government Department led forums which sought to investigate land use conflict between new primary industry activities and existing businesses and industries. Through these forums it has become apparent that interface conflict continues to exist in the regions, particularly conflict arising from elements such as spray drift. Interface conflict in these circumstances are in many ways 'wicked problems' where the planning system is being asked to manage and address issues which are mandated at a Federal level and regulated at a State level. Whilst it is valuable to identify this complexity in the SPPs and prepare Policies in an attempt to *'promote co-existence with adjoining primary industries and avoid land use conflict'* (Policy 2) without the preparation of detailed Code policy the issues identified will continue.
- Policy 4 – Council supports the notion of shared responsibility for interface however notes that this Policy does not clearly articulate how interface between competing primary industries should be addressed. Further, as the outcomes of the definitions review are unknown at this time, it is not clear whether different primary industries will continue to be treated as separate land use types (e.g. agriculture and horticulture), or whether these will fall under the same Land Use Class.

SPP 9 – Employment Lands

- General – Council supports policies which seek to cluster and support employment land growth which is appropriately integrated with infrastructure, having experienced the limitations which present when this is not the case (e.g. Kingsford Regional Industrial Estate).

SPP 15 – Natural Hazards

- General – The identification and mitigation of natural hazards is an important consideration and it is imperative that robust planning policy is introduced within the Planning and Design Code to ensure the hierarchy of risk management is achieved.

Please do not hesitate to contact me on telephone [REDACTED] or [REDACTED] should you wish to discuss the content of this letter further.

Yours sincerely



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