



Planning  
Institute  
Australia

RECEIVED

21 Sep 2018

DPTI

21 September 2018

Mr Tim Anderson

Chairperson - State Planning Commission

Department for Planning, Transport and Infrastructure

Via email: [DPTI.PlanningEngagement@sa.gov.au](mailto:DPTI.PlanningEngagement@sa.gov.au).

Dear Mr Anderson

**RE: DRAFT STATE PLANNING POLICIES**

The South Australian Division of the Planning Institute of Australia (PIA) welcomes the opportunity to provide a submission on the draft State Planning Policies (SPPs) circulated for public comment by the Department of Planning, Transport and Infrastructure (DPTI) and the State Planning Commission (Commission).

PIA SA acknowledges these policies will form the highest level of planning policy control and guidance in South Australia and commend the State Government on preparing a comprehensive suite of policies for consultation.

This submission reflects the views of the members of PIA that have offered comments to the SA Division Committee, as well as that of the Committee. The Committee has a diverse membership of 16 professionals from across a range of sectors within the planning industry. Our Committee has reached out to PIA members, including Fellows of PIA, to assist in the review of the draft SPPs.

The views expressed in the PIA submission generally reflect comments made by PIA during the drafting of the SPPs, including at Industry Liaison Group (ILG) meetings. In particular, commentary through the ILG expressed a need for the draft SPPs to have sufficiently detailed evidence based policy.

In preparing our submission, we reflected on the Government's bipartisan directions for Planning Reform which were agreed upon in 2015 in response to the final report and recommendations of the Expert Panel on Planning Reform. In relation to "Reform 5 -Create in legislation a new framework for State Directions", the intended planning reform was for State Planning Policies to: facilitate a clear line of sight from state-wide Government priorities and policies to on-ground decisions and actions; help resolve persistent issues such as integration of natural resource management and affordable housing policies into the planning system; and enable the simplification and rationalisation of other statutory and non-statutory policy document.

Overall, there were some common and general observations that our members consistently made on the draft SPPs document. These comments reflect the breadth of detail within each of the policies and the language used to articulate the intent of each policy. Members expressed some disappointment that the policies do not effectively meet their stated intention of providing efficiency, consistency and certainty in the planning system.

Common feedback received noted the policies lacked cohesion and sufficient detail to effectively fulfil their role in guiding the: preparation and amendment of regional plans and the Planning and Design Code; preparation and assessment of Environmental Impact Statements; and preparation of Infrastructure Scheme proposals.

Further, resolving high-level policy conflicts should be one of the primary purposes of the SPP document; this aligns with the Expert Panels recommendation to create the State Directions. . The document states “In some circumstances the SPPs may compete or even be in conflict”. This inclusion conflicts with the Commission’s messaging of the intent of the SPPs to “give our planning system a rigorous foundation, providing the community and investors with greater confidence and clarity”. To this end, resolving land use conflicts should be one of the primary purposes of the SPPs under an overarching vision statement for the state of South Australia.

There is insufficient guidance provided on how they are to be implemented by the Minister for Planning, Commission, DPTI or Joint Planning Boards, who will all have a role to play in the preparation and approval of Regional Plans and the Planning and Design Code. One of the key criticisms of the current State’s planning policy framework through various reviews, including by the Expert Panel for Planning Reform, is that there is no line of sight between state level policy and its application in local zoning policy. PIA members consider this has not yet been resolved in the draft SPPs as presented. PIA suggests that if this is not intended to be included in the SPP document that any draft Planning Guideline or Direction where implementation will be detailed should be prepared and consulted as a package.

Members notes the language used to describe and articulate each policy is concerning. Several members (including members with legal expertise) expressed concern with the language and structure of the document, which in several instances is ambiguous, unclear and open to wide-ranging interpretation. There are often numerous terms for what could be defined as the same thing however it is difficult to ascertain. The document would benefit from the use of common language and definitions and possibly also a glossary (potentially linked to land use definitions to assist in creating that ‘light-of-sight’).

Members note that there is a high degree of duplication between the SPPs and *The 30-Year Plan for Greater Adelaide*, which is a great starting point however it raises question as to the SPPs relevance within the hierarchy of planning instruments contained within the new planning system. This level of duplication also highlights the degree to which the SPPs are primarily metro-centric, being generally applicable to Metropolitan Adelaide (in some cases the City of Adelaide). Strengthen of the policies so ensure applicability of similar issues within the regional parts of South Australia would create stronger State document.

Further to this, State Planning Policy 1: Integrated Planning where the transect of urban settlements and landscapes is primarily focused on Metropolitan Adelaide. It is recommended that the transect be enhanced to also reflect the distinctions in landscape and urban development patterns that exist in our regional cities (e.g. Mount Gambier and Port Lincoln), townships (e.g. Ceduna, Coober Pedy) and small towns.

As is common during the development of evidenced based policy to undertake significant research during its development. Whilst this may be the case in the development of the draft SPPs it is not evident in reading the document. PIA also suggests that scenario testing could aid in strengthening the document.

PIA recognises that DPTI and the Commission are valiantly working to deliver on the reforms to the planning system. We acknowledge their contributions and aspirations to deliver good planning

outcomes. As a way forward, PIA would be pleased to work closely with DPTI and the Commission to collaborate with the broader planning profession on enhancing the SPPs to ensure that they reflect their envisaged role within the new planning system.

PIA offers to bring in a diverse group of members, including Fellows, to collaboratively work with DPTI and the Commission in this task, recognising that the combined experience and knowledge of the wider planning profession offers significant benefits to achieving the objectives of reform.

We would also propose that a similar approach be adopted for further development of planning instruments and guidance material as part of the reforms. The task is significant and PIA reiterates it is committed to working with the reform team to ensure that this reform provides the best outcomes for the people of South Australia and truly delivers a world class planning system.

We have also attached a separate list of specific issues as received from members for your consideration. This is attached as Attachment 1 to our submission.

PIA thanks you for this opportunity to comment on this document, and please do not hesitate to contact the undersigned on [REDACTED] to discuss this submission further.

Yours Sincerely

A handwritten signature in black ink that reads "KORJA". The letters are stylized and cursive.

Kym Pryde RPIA

**PIA SA President**

## **Attachment 1**

### **State Planning Policy 1: Integrated Planning**

*Policy 5* – should include references to areas of biodiversity significance also being protected from urban growth. Although there is a separate policy heading relating specifically to biodiversity, this would reinforce the message.

### **State Planning Policy 2: Design Quality**

*Policy 8* – refers specifically to low-medium density development: ‘*Enable quality design solutions in the planning and design code for low-medium density development*’. Quality design solutions should be facilitated for all development. This policy should be revised to reflect a broader context.

*Policy 5* – This policy speaks to foster a culture which appreciates quality design outcomes and creativity and should also reference appropriate and quality material choice. Material choice plays a crucial role in achieving quality design outcomes and can influence a building’s life span, energy efficiency and appearance.

### **State Planning Policy 3: Adaptive Reuse**

*Policy 1* – The policy refers to removing barriers to encourage innovative and adaptive reuse of historic buildings. Clarification as to what these barriers are need to be articulated.

*Policy 4* – Speaks to prioritising adaptive re-use specifically in the City of Adelaide and other mixed use precincts. Adaptive re-use is desirable Statewide.

### **State Planning Policy 4: Biodiversity**

Specific reference could be made in State Planning Policy 4 to encourage better design outcomes to generate energy efficient buildings. By promoting greater energy efficiency and reducing our impact upon the environment, we support improved biodiversity.

### **State Planning Policy 5: Climate Change**

Due to the impacts of climate change, our state is expected to lose areas of arable land as the Goyder Line is suspected to be shifting south and the anticipated climate becomes hotter and drier. The protection of valuable farming lands and better surety of food security is affected by climate change.

### **State Planning Policy 6: Housing Supply and Diversity**

*Policy 2* –The 30 Year Plan for Greater Adelaide identifies urban renewal and infill development as the way forward into the future. This should be referenced as a preferred stance over the progression of greenfield developments.

*Policy 3* – This promotes the centric growth of Regional Centres in preference to ribbon and sprawled development, creating small pocket communities and resulting in community isolation through lack of suitable facilities and infrastructure, as well as promoting car dependence.

*Policy 7* –Speaks to providing planning incentives and concessions to promote affordable housing. Quality design outcomes should not be prejudiced in providing these incentives.

### **State Planning Policy 7: Cultural Heritage**

*Policy 1* – Include the word “buildings” in the policy to read: ‘*Support and promote the sensitive and respectful use of our culturally and historically significant places and buildings*’. This will make the intent clear to all readers.

### **State Planning Policy 8: Primary Industry**

State Planning Policy 4 addresses minimising the loss of areas of high biodiversity. Additional policy under State Planning Policy 8, which seeks greater efficiencies in established agricultural lands prior to pursuing new land in areas of potentially high biodiversity value, could reinforce protection of these areas.

### **State Planning Policy 9: Employment Lands**

*Policy 6* reads: ‘*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*’. This policy insinuates that it is the role of urban planning to help generate competition within the retail sector via zoning.

An appropriate supply of land should be made available for retail development to adequately service a community however it is not the role of urban planning to try to stimulate competition in business.

### **State Planning Policy 10: Key Resources**

Mining of natural resources plays an enormous role in South Australia in generating employment and wealth for the state. The policies presented are brief however strong and mining focussed.

There may be instances where mining is inappropriate due to likely poor environmental outcomes or even the consumption of farming land which would in lieu provide longer term employment and food security.

Further guidance could be provided in this section as to when mining is not appropriate e.g. in areas of high biodiversity or in areas of high food production value.

### **State Planning Policy 11: Strategic Transport Infrastructure**

*Policies 2 & 9* – These policies are quite similar in nature and promote development within close proximity to existing and planned transport routes/corridors/nodes etc. These policies could possibly be amalgamated or one be potentially redrafted to provide a greater emphasis on promoting mass transport systems.

*Policy 6* – This policy encourages a wider variety of transport modes including active travel to reduce reliance and use of private motor vehicles. Greater practical direction via policy here would be beneficial.

### **State Planning Policy 12: Energy**

*Policy 5* – reads as follows: ‘Ensure renewable energy technologies support a stable energy market and continued supply and do not adversely affect the amenity of regional communities’.

With the effects of climate change and a large number of policies within this draft document proposed to help offset these effects, renewable energy should be paramount and the policy should encourage this outcome.

### **State Planning Policy 13: Coastal Environment**

*Policy 4* is unclear and should articulate which kinds of development require location in coastal areas.

### **State Planning Policy 14: Water Security and Quality**

The importance of environmental flows in rivers play a vital role in maintaining the health of these eco-systems. They promote and sustain freshwater ecosystems, prevent algae blooms, promote general river health and biodiversity and aid downstream environments. Mention of environmental flows as a part of supporting a healthy environment could be positive is advisable.

### **State Planning Policy 15: Natural Hazards**

One of the anticipated consequences of climate change will be storm events which are likely to generate heavier and more sustained rainfall.

A policy similar to *Policy 4* which speaks to mitigation of extreme heat events, could be inserted to deal with appropriate response to sudden and heavy rainfall events. Efficient discharge and capture of stormwater during storm events avoids damage to property and infrastructure and promotes reuse and conservation of our water resources.

### **State Planning Policy 16: Emissions and Hazardous Activities**

The draft policies presented are brief but appear constructive and will assist with planning for industrial activities and their effect upon the environment and the locality.