Please find below a submission on the draft ‘State Planning Policies’ adopted by the City of Victor Harbor at its meeting held on 27 August, 2018 (Ref: OC4832018):

**Policy 1 - Integrated Planning**: This Policy is quite city-urban centric, which makes it difficult to apply some of these sub-policies within a regional context e.g. Policy 7.

**Policy 2 - Design Quality**: The soon to be created and new Planning & Design Code is likely to introduce a regulatory and prescriptive process, which may not necessarily encourage the necessary negotiations to occur between all parties to achieve good design outcomes (visionary statement but unable to be implemented within the new development assessment process/system).

**Policy 3 - Adaptive Reuse**: It is very difficult to ‘remove barriers’ and/or ‘provide dispensation on prescriptive requirements’ within a regulatory planning system and, unsure how this can occur.

**Policy 4 - Biodiversity**: Within the Objective, how is a ‘natural ecosystem’ to be clearly defined? Also within the Policies, there needs to be clear definition of the meaning ‘natural values’ and ‘modified landscapes’.

**Policy 5 - Climate Change**: This Policy is quite city-urban centric which makes it difficult to apply some policies within a regional context e.g. Policy 1 Integrated Planning - Policy 7; Policy 5 Climate Change - Policy 1. Should potentially include encouraging climate change ‘adaptation’ measures.

**Policy 6 - Housing Supply and Diversity**: This Policy is quite city-urban centric which makes it difficult to apply some policies within a regional context e.g. Policy 6 Housing Supply & Diversity – Policies 2 & 8. Policy 7 - How would a ‘planning policy bonuses and concessions’ framework be applied and work, when a planning vision for an area/locality is already set? Policy 3 – Need to ensure and mention that infrastructure costs and subsequent provision is shared appropriately/equitably.

**Policy 8 - Primary Industry**: Policy 4 – Use of the term ‘equitably’ may need to be changed to ‘preserve’ or ‘protect’.

**Policy 9 - Employment Lands**: Policy 6 – need to define the term ‘accessible to communities’. Policy 10 – Transport and access role is not really addressed or mentioned enough here, may need a new Policy similar to Policy 3 within ‘Key Resources – Policy 10’.

**Policy 12 - Energy**: Policy 1 – Could suggest inserting ‘complimentary’ before ‘land uses’. Policy 4 – The use of the term ‘major’ may be questionable, as the future may see more localised energy generation, not necessarily ‘major’ services/providers/generators.

**Policy 13 - Coastal Environment**: Policy 3 – should ‘beaches’ or ‘foreshore environments’ also be included here? Policy 5 – environmental impacts can usually be ‘managed’ but not always with the best/appropriate application or outcome, may need another phrase/term here. Policy 4 – Is this a repeat of Policy 15 ‘Natural Hazards’?

Regards,

David Read | Strategic & Policy Planner

City of Victor Harbor
1 Bay Road, Victor Harbor SA 5211

Phone: ☎️ Mobile: ☎️
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