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DPTI

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## **Submission – State Planning Policies**

Council supports the overall intent of the proposed State Planning Policies (SPPs) however it wishes to make the following observations and comments.

Primarily Council expresses its deep concern with the lack of regional focus and believes that the SPPs are very metropolitan (Adelaide) focussed, largely because they have been based on the 30 Year Plan for Greater Adelaide. The SPPs are supposed to be for the whole state and therefore should be reflective of this. Given the importance of our regional centres and the City of Adelaide to our state's economy and settlement patterns, it is suggested that there be a standalone policy for Regional Centres and one for the City of Adelaide. This emphasises their importance rather than being singled out within specific policies as is proposed.

The structure of the document is questioned as there is the overarching policy, then there is an objective and a series of policies underneath which make it confusing. Perhaps the objective should sit under the main policy heading and the sub policies be numbered 1.1, 1.2 etc. or be called outcomes or strategies. The number of policies is also queried and the question is could some be combined or reworded as there is overlap between some of them with integrated planning and housing supply and diversity being an example. Having said that the preamble to the policies outlines well the key issues however, this is not necessarily translating into the policies themselves.

An obvious omission is built heritage and character areas. This needs to either be a separate policy or be incorporated into the Cultural Heritage Policy. Many Councils have historic conservation areas and local and state heritage items which need to be recognised and supported through protection measures and adaptive reuse initiatives.

The following comments relate to the specific policies.

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

Although a good overarching policy, there is emphasis on metropolitan Adelaide and may not be able to be applied in regional centres or townships. This is reflected in the overall comments above.

### **Policy 2: Design Quality**

An additional policy should be included on incorporating design elements to promote climate smart buildings. Although this is covered in Policy 5 Climate Change it should also be a key design element.

### **Policy 3: Adaptive Reuse**

Outlines the adaptive reuse of existing buildings however it is an opportunity to incorporate the adaptive reuse of heritage buildings. Policy 6 is questioned as this reads as a mechanism to achieve a policy and therefore question its inclusion. Incentives and bonus schemes are certainly supported if it

achieves better outcomes but it may better placed in the regulations or the proposed practice directions.

#### Policy 4: Biodiversity

The policy seems to focus more on recognised natural values and areas and does not address biodiversity within the smaller urban setting. For example what impacts on biodiversity will occur as a result of infill development and the loss of backyards? The policy could go further in terms of supporting revegetation or creation of green spaces in order to meet the urban green canopy target and support the policies within the housing supply and diversity policy. These two policies need to be able to interact with each other. How will the mitigation hierarchy be measured and reflected in the planning and design code?

#### Policy 5: Climate Change

There are no particular concerns with this policy as it is a high level document and it certainly has a strong relationship with all of the other policies. The concern is how this will be reflected through the code.

#### Policy 6: Housing Supply and Diversity

The question with this policy is whether it would apply to regional centres and towns? However if a separate policy is created then a suite of policies can be developed that are more reflective of their development patterns and in particular in the area of densities. There is no recognition of character and sympathetic development within this policy. It is suggested that Policy 1 reads better as the objective than the actual listed objective.

#### Policy 7: Cultural Heritage

As previously indicated this policy needs to be expanded to include the built heritage and other heritage items such as landscapes, artefacts etc. if there is not to be a separate policy to cover this.

#### Policy 8: Primary Industry

The policies are generally good however; a level of flexibility is needed to allow for farming diversification and value adding opportunities as well as the ability to provide for worker's accommodation and aging in place. The key to this policy is its' translation to the new code and ensuring that there are mechanisms to protect agricultural land. The Environment and Food Production Area goes some way towards this however there is a lot more agricultural land within the state that needs to be supported.

Agriculture can play a key role in the mitigation of emissions – this could be identified under the primary industry policy or in fact policy 16.

#### Policy 9: Employment Lands

A definition of what is included in employment lands would be beneficial as there would appear to be no focus on regional or suburban centres. However this could be covered if there is a separate regional centres policy.

#### Policy 10: Key Resources

A reasonably straight forward policy as mineral and energy resources are primarily governed by other legislation, however it is important to be identified.

#### Policy 11: Strategic Transport Infrastructure

The supporting dialogue to the policy covers all elements of transport infrastructure however it doesn't really translate into the policy. For example there is no policy on airports and rural road networks for primary producers.

#### Policy 12: Energy

No particular concerns are raised with this policy.

#### Policy 13: Coastal Environments

This policy highlights the need for good coastal mapping, so that areas which are likely to be impacted by coastal hazards are clearly known, to ensure good planning outcomes.

#### Policy 14: Water Security and Quality

As water supply is a fundamental element to living and sustaining our food production it is suggested that the policies be strengthened to ensure water reuse and collection opportunities through water sensitive urban design principles (WSUD), rain water collection and stormwater and waste water reuse or other emerging technologies are promoted. There should also be surety that urban development in the upper reaches of catchment areas will not adversely impact on downstream users, particularly if they are within a food production area, hence why WSUD should be clearly articulated in policy.

Does planning have a role to play in water security? Can definitely identify that it has a role in water quality and reuse as this can be managed through new development. The use of water and how it is used is the role of other jurisdictions.

#### Policy 15: Natural Hazards

A fairly straight forward policy however it again highlights the need for good mapping to ensure high risk areas are clearly articulated to inform future growth areas and development generally.

#### Policy 16: Emissions and Hazardous Activities

Agriculture can play a key role in the mitigation of emissions – this could be identified under this policy or highlighted within the primary industry policy.

Important that this is being recognised at this level.

Please contact Sally Roberts, Manager Planning and Development on [REDACTED] should you have any queries in relation to this submission.