19 September 2018

Ms Sarah Elding
Project Lead State Planning Policies
Department of Planning, Transport and Infrastructure
Level 5, 50 Flinders Street
ADELAIDE SA 5000

Dear Sarah

Draft State Planning Policies Consultation

At its meeting on 18 September 2018, Council considered a report and feedback regarding the Draft State Planning policies and resolved:

> *"1. The proposed feedback be approved and submitted to the Department of Planning, Transport and Infrastructure as Council's response to its request for feedback through the consultation on the sixteen draft State Planning Policies (July 2018) for South Australia.*
>
> *2. The Chief Executive Officer be authorised to approve any minor additions or changes of an editorial nature required prior to final submission to DPTI."*

Please refer to the attached extract of the report and consultation response for details of Council's concerns and suggested improvements.

Should you require further information, please contact Rebecca Perkin, Team Leader Strategy on ████████.

Yours sincerely
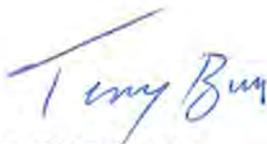
Terry Buss PSM
Chief Executive Officer

Encl
Extract from Council and Standing Committees Agenda and Minutes 18 September 2018
Proposed Feedback on the State Planning Policies

11.1   Proposed Feedback on the State Planning Policies

Brief

This report presents proposed feedback to the State Planning Commission on its sixteen draft State Planning Policies.

RECOMMENDATION

The Committee recommends to Council that:

1.   The proposed feedback be approved and submitted to the Department of Planning, Transport and Infrastructure as Council's response to its request for feedback through the consultation on the sixteen draft State Planning Policies (July 2018) for South Australia.

2.   The Chief Executive Officer be authorised to approve any minor additions or changes of an editorial nature required prior to final submission to DPTI.

Introduction

Under the *Planning, Development and Infrastructure Act 2016* (Act), all designated planning instruments will have to comply with the objectives and policies prescribed by the relevant SPPs during both the initiation and amendment phases of regional plans and the Planning and Design Code (Code). The Code will determine the 'rules' against which development applications are assessed. These 'rules' must reflect and align with relevant SPPs.

Consequently, the State Planning Commission (SPC) has developed and released sixteen (16) draft State Planning Policies (SPP's) for consultation until 21 September 2018. The SPP's set out a framework for land use in South Australia that aims to improve the liveability, sustainability and prosperity of the state. Of these 16 SPPs, six have been legislated as follows:

- **Design Quality**
- **Integrated Planning**
- **Adaptive Re-Use**
- **Climate Change**
- **Biodiversity**
- **Preservation of Special Areas - Special Legislative Schemes**

This report seeks to provide feedback on the policies most affecting the City of West Torrens. The consultation document is attached **(Attachment 1)**.

Discussion

A summary of the State Planning Policies is detailed in the table below. Please note that feedback will not be provided on SPPs 8 & 10 (shaded salmon) due to the lack of relevance to the City of West Torrens.

NO.	SPP NAME	OBJECTIVE
1	Integrated Planning	Integrated planning is an essential approach for liveability, growth and economic development, maximising the benefits and positive long-term impacts of development and infrastructure investment.
2	Design Quality	The Principles of Good Design are embedded within the planning system to elevate the design quality of South Australia's built and natural environment and public realm.

NO.	SPP NAME	OBJECTIVE
3	Adaptive Reuse	The adaptive reuse of existing buildings accommodates new and diverse uses.
4	Biodiversity	Biodiversity is valued and conserved, and its integrity within natural ecosystems protected.
5	Climate Change	Our greenhouse gas emissions are reduced and development that is climate-ready is promoted so that our economy, communities and environment will be more resilient to climate change impacts.
6	Housing Supply and Diversity	A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.
7	Cultural Heritage	Places of cultural heritage significance and heritage areas are conserved for the benefit of our present and future generations.
8	Primary Industry	A diverse and dynamic primary industry sector making the best use of natural and human assets.
9	Employment Lands	Employment lands are protected from encroachment by incompatible development and are supported by appropriate transport systems and infrastructure.
10	Key Resources	Key resources continue to contribute to our state's economy and provide valued employment opportunities.
11	Strategic Transport Infrastructure	Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and business.
12	Energy	The ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business.
13	Coastal Environment	Protect and enhance the coastal environment and ensure that development is not affected by coastal hazards.
14	Water Security and Quality	South Australia's water supply is protected from the adverse impacts of development.
15	Natural Hazards	Communities and developments are protected from the adverse impacts of natural hazards.
16	Emissions and Hazardous Activities	Communities and the environment are protected from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.

The proposed feedback is included in **Attachment 2** for Council's consideration.

Key Issues for Council

The consultation document states that the SPP's may conflict, and indeed they do, and that those conflicts should be resolved as efficiently and transparently as possible taking into account specific regional and local circumstances. However, it is unclear how, in practical terms this will be achieved, as those development applications to which the SPPs will be applied are those to be merit assessed and the Council will not necessarily be the Assessment Body.

Furthermore, community consultation in the development assessment process is limited and without Council's involvement, how will the local considerations be canvassed?

The targets contained in the consultation document, which are consistent with provisions in The 30-Year Plan for Greater Adelaide, would on the face of it, seem to be conflicting. In particular, 85% of all new housing in metropolitan Adelaide will be built in established areas while at the same time urban green cover is to be increased by 20%.

It is evident through the infill development undertaken to date that an increase in green cover has not been achieved, in fact it has been significantly reduced, resulting in increased surface temperature as can be evidenced by the results of the Western Region Urban Island Heat Mapping project which clearly shows the effect of medium and high density development. Results are shown below which demonstrate that areas of high density have higher average surface temperatures, significantly less tree canopy as well as a reduction in private open space.

Low Density Residential Zone

Medium Density Residential Zone

High Density Residential Zone

The reduction in open space, coupled with a reduction in tree canopy resulting in higher surface temperatures will also have an impact on active transport as people will be less inclined to use active transport in areas of higher heat.

Infill development to date has had an adverse effect on open space and tree canopy as developers look to maximise return on investment and many of the subdivisions are for single allotments or smaller parcels of land where there is little space to include open space or trees. This is further impacted by a reduction in street trees resulting from an increase in the number of driveways. This is supposed to be offset by public open space funded by the 12.5% open space contribution but in reality, many of these suburbs already have insufficient open space and there are limited opportunities to increase this.

While many of the policies presented in the document are sound, further examples of the conflict between, and within, SPPs as well as potential improvements to expression are highlighted in **Attachment 2** which provides feedback on the proposed objectives and sub-policies within each proposed (Draft) State Planning Policy.

Conclusion

This report presents the sixteen draft State Planning Policies (July 2018) which have been released for consultation by the Department for Planning, Transport and Infrastructure and proposes feedback for Council's consideration, approval and submission.

Attachments

1. **Consultation: Draft State Planning Policies for South Australia**
2. **Proposed Feedback on State Planning Policies**

STATE PLANNING POLICY 1: INTEGRATED PLANNING

Objective

Integrated planning is an essential approach for liveability, growth and economic development, maximising the benefits and positive long-term impacts of development and infrastructure investment.

Policies

1. Plan growth in areas of the state that are connected to, integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions.

2. Ensure that areas of rural, landscape, environmental or food production significance within Greater Adelaide are protected from urban encroachment as provided for by the Environment and Food Production Areas legislation.

3. Provide an adequate supply of land outside the Environment and Food Production Areas that can accommodate housing and employment growth over the relevant forecast period. Based on current dynamics, the relevant forecast period is considered to be 10 years.

4. Manage growth in an orderly sequence to enable the cost-effective and timely delivery of investment in infrastructure commensurate with the rate of population growth into the future.

5. Plan for urban growth to protect and preserve opportunities for high value horticulture, tourism and landscape character areas.

6. Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.

7. Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced car parking to encourage greater use of active transport options such as public transport, walking and cycling.

8. Support metropolitan Adelaide as a predominantly low to medium rise city, with high-rise focussed in the CBD, parts of the Park Lands Frame, significant urban boulevards and other strategic locations where the interface with lower rise areas can be managed.

Response to SPP 1:

Policy 1

In the case of City of West Torrens (CWT) there are two key factors driving growth: infill development and higher density development; for example in within proximity to Centre Zones, but more particularly, along Urban Corridor Zones; which was part of the Government's strategy to concentrate new developments around transit corridors (The 30-Year Plan for Greater Adelaide).

The planning policies for the Urban Corridor Zones and other developments that are able to be classified as "Designated Areas' allow for significantly lesser parking to be provided by developers. While encouragement in the use of public transport and other non-car modes of

travel is supported and is desirable, there is no evidence presented that shows a trend to reduced car ownership or reduced car usage flowing on from these policies. It is unclear if, at the time that Urban Corridor Zones were contemplated by Government, adequate modelling was undertaken to assess the adequacy of the main road network to accommodate the increase in trips generated, as a result of higher population growth along these growth corridors.

Based on the experience of CWT of the last few years, a number of key issues have emerged:

- For Urban Corridor Zones in particular, the reduced parking rates have meant that more and more of the parking demands of the new developments are overflowing into the local street network, to the detriment of existing business and residents.

- The increasing higher density developments, particularly townhouses and row dwellings, has seen a reduction in kerb space for on-street parking, as more and more individual driveways are constructed to service these types of new dwellings.

- While individually each higher density development does not by itself create traffic impact issues along the main arterial road, due to the significant lengths of higher density zones encouraged by the Government, these developments collectively would add to the congestion that is currently experienced in many key intersection nodes.

The above experience suggests that to date the State's planning policies do not seem to have embraced an integrated approach in relation to how these growth areas are planned and managed. The upgrade of major arterial roads generally have a very long lead time and are also subject to budgetary constraints, compared to developments which are market-driven and often occur within a very short period of time.

There appears to be disconnect between policy and what actually occurs.

At the very least, the State Planning Policies should look at how the Government's strategies have performed to date, consider if the desired outcomes have been achieved and base the new assessments on *realistic* modelling in order to amend the shortcomings of the previous policies.

The 'discounted' parking rates that were adopted across the metropolitan area for Urban Corridor Zones and 'Designated Areas' should also be re-assessed, given the parking overflow issues that have been created and with no apparent significant modal shift occurring. There also needs to be a re-evaluation of whether public transport services have kept pace with the modal shift outcome sought by 30-Year Plan (as per commentary about the tram capacity constraint, below).

Policy 4

As noted previously, the upgrades of major arterial roads generally have a very long lead time and are subject to budgetary constraints, compared to developments which are market-driven and often occur within a very short period of time.

One example of the need to deliver investment in infrastructure in a timely manner to support the current growth policies is the tram network. As a major people-mover, the City to Bay tram service is intended to encourage people to use this service for work trips instead of using private vehicles.

While the tram service has been very successful in increasing patronage, CWT understands that the tram service is already operating at, or close to, capacity. As more and more development occurs close to the tram route, the capacity issue would eventually become a constraint to achieving the outcomes of the State Planning polices, unless plans to address the constraint issues are identified early and upgrades to the tram service planned in the very near future.

Policy 7

While encouragement in the use of public transport and other non-car modes of travel is supported and is desirable, there is no evidence presented that shows a trend to lower car ownership or lower car usage flowing on from these policies. It may be that this behavioural change would occur eventually in the long term but the implications of the reduced car parking provisions are already being felt in the CWT, where competition is increasing for the limited and decreasing kerb space available for overflow parking. An interim plan may be necessary as modal shift to active transport gradually occurs over time.

STATE PLANNING POLICY 2: DESIGN QUALITY

Objective

The Principles of Good Design are embedded within the planning system to elevate the design quality of South Australia's built and natural environment and public realm.

Policies

1. ~~Ensure~~ Plans encourage development that incorporates the Principles of Good Design.

2. Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design, Access for All, Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design.

3. ~~Ensure~~ The development of safe, welcoming, comfortable and efficient buildings and places reduce<u>s</u> economic and social disparity.

4. ~~Ensure~~ Design advice is considered early in the planning process for complex developments and utilises consistent and credible processes (such as a Design Review) to ensure better outcomes.

5. Promote a culture of good design to foster creative thinking, innovation and effective design processes and <u>outcomes</u> within the planning <u>profession</u>, allied fields and general public.

6. Provide high quality <u>safe</u>, functional and accessible public green spaces and streetscapes, particularly in areas with increasing infill development, housing diversity, population growth, medium to high residential densities and urban renewal.

7. Prioritise performance based design quality outcomes in Adelaide City; ~~heritage and character areas~~; places where medium-rise buildings interface with lower-rise development; mixed-use renewal precincts; transit corridors; and iconic locations that attract high levels of pedestrian activity and/or tourism.

8. Enable quality design solutions in the planning and design code for ~~low-medium density~~ all development, <u>including low-medium density</u>.

Response to SPP 2:

Editorial and expression enhancements as per underline and strike-through text edits above.

The objective of the policy sets out to embed principles of good design not only in buildings, but also the natural environment and the public realm. The policy seeks to promote development using the Principles of Good Design and other design principals to promote best practice in access and inclusion.

It may be problematic to attempt to address both private realm and public realm design within the same SPP as to do so risks providing inadequate direction on both. Public Realm is an area of major interest and impact for local government and therefore may warrant a separate SPP. There is an opportunity to introduce policy that is wider reaching for the public realm, extending to places where people can meet as a community, where it is a safe and welcoming of different types of people. This includes the creation of vibrant places and

aesthetically interesting places and objects as well as the protection of people in crowded places.

Policy 2

The principle of promoting access and inclusion planning in the design of buildings and places is supported by the Administration, as is the incorporation of the philosophy of "Access for All". Consideration of the increasing number of elderly and prevalence of degenerative conditions such as dementia and Alzheimer's are important in public buildings and the public realm.

Water sensitive urban design is particularly important in areas such as CWT where every effort is required to minimise the impacts of overland flooding.

Some consideration of encouraging ideal passive solar orientation for new buildings could avoid costly retrofitting of engineering solutions.

Policy 5

Policy 5 promotes the culture of good design to foster creative thinking, innovation and effective design processes. The introduction of the overarching principles of design to the policy would provide leadership and drivers for good design.

Environmentally sustainable urban design requires a standalone policy to venture beyond the focus on energy and green buildings. It captures balanced human development, heathy and sustainable communities, innovation thought technology and integrated infrastructure.

It is possible this policy is too far reaching. Whose role is it to promote the 'culture'- and is it the role of a strategic document to dictate the culture to be promoted? It may be more feasible for policy to "Promote good design outcomes that inspire creative thinking, innovation and design outcomes on key development sites for the benefit of the planning profession, allied fields and general public."

Policy 6
How will Policy 6 be achieved when areas of infill development consistently result in a reduction of tree canopy and private open space? In some areas identified for medium density infill, there is already a lack of open space with little opportunity or funding to purchase land for use as open space. Heat mapping has shown that areas of infill development suffer consistently higher daytime and night time temperatures reducing liveability.

Policy 7

Policy 7 informs on the performance based design quality outcomes. Urban design qualities of human scale, legibility and linkage should be introduced to this policy. By considering these qualities the relationship between the physical features of the environment and the walkability of the locality can provide effective urban design solutions.

In CWT character and heritage areas have been retained through the Housing Diversity DPA in direct response to community feedback. Accordingly, Council seeks to ensure that Character and heritage areas identified in the West Torrens Development Plan are retained in their current form and these concepts continue despite changes to the planning system. The 'codification' of qualitative standards to satisfy performance-based e-planning requirements, risks ignoring important design elements which provide a distinct sense of place in character and heritage areas.

Local communities need to be drawn into the conversation on design quality, especially in the context of heritage and character suburbs/areas.

Policy 8

Quality design solutions should be a part of all development, not just low-medium density.

APPENDIX 1
RELATIONSHIP BETWEEN RESIDENTIAL DENSITY AND SURFACE TEMPERATURE

High Density
Residential Zone
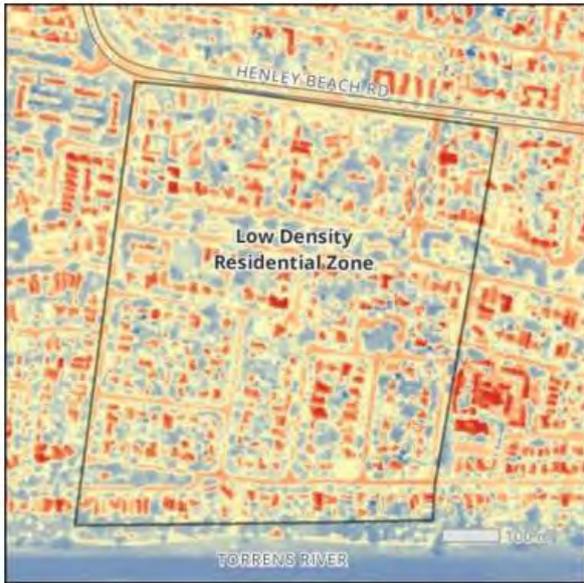
STATE PLANNING POLICY 3: ADAPTIVE REUSE

Objective

The adaptive reuse of existing buildings accommodates new and diverse uses.

Policies

1. Remove barriers and encourage innovative and adaptive reuse of underutilised buildings and places to inspire urban regeneration, stimulate our economy and unlock latent investment opportunities.

2. Sponsor models of adaptive reuse that allow flexible access to public spaces and infrastructure.

3. <u>Encourage and e</u>nable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our state's history.

4. Prioritise the adaptive reuse of buildings within the City of Adelaide and other mixed-use precincts.

5. Facilitate the conversion and adaption of existing commercial office buildings in the City of Adelaide for residential or mixed-use.

6. Provide a range of planning and development incentives and bonus schemes to streamline decision-making processes, provide dispensation on prescriptive requirements that constrain opportunities, and capitalise on related regulatory or financial incentives outside of the planning system.

7. Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health and safety.

Response to SPP 3

Editorial and expression enhancements as per underline and strikethrough edits above.

Objective
The objective is inclusive of all established buildings to be adaptively reused or repurposed. An historical perspective of reuse is reserved for the policies.

Policy 2
It is not clear who will sponsor these models or what 'flexible access to public spaces' means.

Policy 6

Who will be responsible for determining where the provisions of Policy 6 will apply; who will be accountable for the financial cost of any incentives? How will the streamlined decision-making process be balanced with community expectations for consultation?

Often when large facilities are repurposed (for example automotive plant reused as warehousing) the employment capacity is significantly reduced. The policies mention removing barriers and providing dispensation, however they are weak on providing leadership on how this is to be facilitated to maintain economic development.

Policy 3

Historical buildings are often the most difficult to reuse as they do not meet current expectations or building codes, however are necessary for a city to preserve the historical fabric and sense of belonging.

The policy should provide direction on how the historical buildings are to be repurposed.

STATE PLANNING POLICY 4: BIODIVERSITY

Objective

Biodiversity is valued and conserved, ~~and its integrity within natural ecosystems protected~~.

Policies

1. Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat.

2. Minimise the loss of biodiversity, where possible, in accordance with the mitigation hierarchy:
   a) Avoidance—avoid impacts on biodiversity
   b) Minimisation—reduce the duration, intensity and/or extent of impacts
   c) Rehabilitation/restoration—improve degraded or removed ecosystems following exposure to impacts.

3. Recognise that modified landscapes have environmental value and that development should be compatible with these values.

4. Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for conserving the natural values of that landscape.

Response to SPP 4

Objective

The objective of the policy is succinct and strong and has a firm emphasis on conservation and the value of biodiversity.

However, there is a perceived disconnect between the objective of the SPP and its internal policies. The policies focus on achieving development s that minimise their impact on biodiversity, however it is considered more important to have a policy that focuses on developments that where possible, actually *increase and enhance* biodiversity.

Editorial and expression enhancements as per underline and strike-through text edits above.

Policies
The policies are also considered un-progressive, in that they look at biodiversity from a heavily anthropocentric perspective. Instead, the policies should look at the inherent value of biodiversity rather than its value in terms of tourism and recreation.

Consideration should also be given to a policy that focuses on habitat creation and the planting of indigenous and native plants, to increase biodiversity across the region and connect key corridors for the effective and safe movement of wildlife through the urban environment.

The objective and underlying policies refer to the *natural* ecosystems however this should possibly be removed so *all* ecosystems are valued such as streetscape and private backyard ecosystems i.e. the objective should simply state *biodiversity is valued and conserved*.

Policies should include the requirement for private properties to include a minimum garden space which would enable the protection/creation of ecosystems throughout metropolitan Adelaide.

The Department for Environment and Water's *No Species Loss Strategy 2007-2017* recently expired, however provided a strong vision for the protection of South Australia's native plants, animals and ecosystems and helping them to adapt to a changing climate. The SPP for Biodiversity should provide an equally strong focus on the protection and preservation of biodiversity.

Imagery
Also there may be a more appropriate image to reflect our State's biodiversity rather than a vineyard…

STATE PLANNING POLICY 5: CLIMATE CHANGE

Objective

Our greenhouse gas emissions are reduced and development that is climate-ready is promoted so that our economy, communities and environment will be more resilient and able to adapt to climate change impacts.

Policies

1. Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.

2. ~~Ensure the~~ Design ~~of~~ public places to increase~~s~~ climate change resilience and future liveability.

3. ~~Ensure the development of~~ Develop climate-smart buildings that reduce ~~our~~ demand for water and energy and mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure, urban greening and tree canopy enhancement.

4. ~~Avoid d~~ Development in hazard-prone areas ~~or, where unavoidable, ensure~~ should reduce risks to people and property ~~are mitigated~~ to an acceptable or tolerable level. ~~through cost-effective measures.~~

5. Facilitate green technologies and industries that reduce reliance on carbon-based energy supplies.

6. Protect and enhance areas that provide biodiversity and maximise opportunities for carbon sequestration.

7. ~~Ensure decision-making~~ Consider~~s~~ the impacts of climate change using the best available information on climate risk. ~~which is regularly reviewed and updated.~~

8. Support development that ~~does not~~ contributes to ~~increasing~~ reducing our vulnerability ~~or exacerbating~~ to the impacts of climate change ~~and which makes the fullest possible contribution to mitigation.~~

Response to SPP 5

The policy contains a number of climate-jargon terms, with limited depth and specificity that add little to the policy, such as 'carbon efficient', 'carbon smart' and 'carbon sequestration'. The policy could be improved through inclusion of climate terms within the glossary i.e. define what is meant by carbon-efficient, and climate-smart, etc.

Comments relating to SPP 5 preamble (pages 30-31 of full SPP consultation document): In "The Role of Planning" section, add 'urban heat and wind' to the list of hazards listed under point 2.

Further editorial and expression enhancements as per underline and strikethrough edits in text above. **Policy 6** should include both the public and private realm.

STATE PLANNING POLICY 6: HOUSING SUPPLY AND DIVERSITY

Objective
A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.

Policies

1. Enable the provision of a well-designed, diverse and <u>inclusive</u> affordable housing supply that responds to population growth and targets, and the evolving demographics and lifestyle needs of our current and future communities.

2. Ensure there is a timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.

3. Support regional centres and town growth and the demand for increases in housing supply within the existing town footprint or outside towns where there is demonstrated demand and it is contiguous with the existing development area.

4. Promote residential and mixed-use development in centres and corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.

5. Provide a permissive (<u>within</u> <u>boundaries)</u> and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.

6. Increase the amount and diversity of residential accommodation in Adelaide City to support a variety of household types for a range of age and income groups, including students, professionals and the ageing.

7. Enable and encourage the provision of Affordable Housing through incentives such as planning policy bonuses or concessions (e.g. where major re-zonings are undertaken that increase development opportunities).

8. Support the creation of healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.

Response to SPP 6:

Overall the policy addresses the aspirations of a well-developed modern society seeking affordability and housing choice for the population. It introduces the urban planning concepts of public transport and infrastructure needed to support liveable and walkable neighbourhoods as the fabric for providing housing choice.

There is an opportunity to introduce additional policy that directs development to respect and enhance heritage and character areas when in close proximity to them.

Further editorial and expression enhancements as per underline edits in text above.

Policy 3

This policy comments on the need to consolidate regional centres and discourages new settlements. Policy guidance is required for regional settlements that are in decline or approaching closure.

Policy is provided that seeks to support the creation of heathy neighbourhoods and outlines key components that are required to develop this type of neighbourhood including infrastructure and quality open space.

Policy 4

The type of mixed -use development referred to is limited to the residential locality which infers a type of retail development. There are emerging industries that have potential to coexist with residential development and may be attractors to the locality rather than providers for the immediate locality. The policy should address and support the introduction of new industries that are compatible with residential development in mixed used development.

Policy 5

The permissive and enabling policy for housing in the residential zone as presented in policy 5, only supports current behaviour, whereas there is the opportunity to introduce policy that *advances* innovation and transformation of residential accommodation.

Policy is required that provides guidance on identifying the residential capacity in an area so it may not be exceeded. Not all residential land is suitable for medium to high density development.

Policy 6

Considering the large foot print and low density of the area of Greater Adelaide, this policy's focus on residential accommodation in the City of Adelaide, would ideally be extended to include the suburban inner ring of Greater Adelaide. This would allow for an integration of the diversity from the city to suburbs rather than a step change divided by the green belt of the park lands. Diversity does not necessarily mean high-rise, instead the emphasis should be on new types of residential models which may include opportunity for the "missing middle" townhouse type development etc.

Policy 7

CWT would not like to see car parking or building height concessions encouraged as a means of encouraging affordable housing. Ideally affordable housing should be mixed in with other housing types to avoid a concentration of affordable housing and allow for better integration in the community.

STATE PLANNING POLICY 7: CULTURAL HERITAGE

Objective
Places of cultural heritage significance and heritage areas are conserved <u>and celebrated</u> for the benefit of our present and future generations.

Policies

1. Support and promote the sensitive and respectful use of our culturally and historically significant places.

2. Recognise and protect Indigenous cultural heritage sites and areas of significance.

Response to SPP 7:

It is unclear the intended extent of the terminology e.g.

- Does "places" include buildings, objects and artefacts

- What determines "significance".

The terminology used in SPP7 is vague and open to interpretation. Before fixing any wording of policies in this SPP, it is recommended that DPTI and SPC undertake a conversation with the community to understand where they stand on these matters. It is the cultural heritage of communities past and present that will be protected by this policy, or otherwise.

Further editorial and expression enhancements as per underline edits in text above.

Objective and Policies

Places of heritage significance and heritage areas should not only be conserved, but also ***celebrated*** to maintain currency and awareness. Sense of place and belonging and cultural identity is often reflected through public art and sculptures, this can be a way of celebrating the non-tangible history of an area. Telling the story behind the reason for the significance is an important part of ensuring connection to heritage items and subsequent commitment to conservation.

Community members should have a say in what is determined to be significant, and system of heritage conservation requires appropriate 'knowledge keepers' and communities of interest to be identified and consulted. It would be beneficial for the SPP to acknowledge the requirement for communities to be involved in identifying and celebrating heritage.

Preamble text

Comments on the preamble text from page 38 *of the full version of the SPP Consultation document follow.* Interchangeable use of the terms historic and heritage may be misleading. Likewise, using the term heritage as a descriptor for character serves to further confuse what is already a vexed issue in the Planning sector and broader community.

Heritage is not necessarily tied to character, and a building or place may have heritage value regardless of whether it reflects any local character. Of the current requirements for heritage listings, *aesthetic merit* is only 1 out of 7 factors to be considered.

The importance of including recognition of South Australia's first nation's people is acknowledged and the preamble text would also be enhanced by some mention of our State's *multi-cultural heritage*; use of the broad term "post-colonial heritage" presents a binary image of Indigenous and Colonial heritage. It does not adequately reflect the range of migrant and cultural influences that have contributed to the history of our state and local areas.

Acknowledgement of commercial and economic heritage (e.g. Adelaide Airport) could further enhance this SPP. For example a place like the Adelaide Airport may be deemed to be culturally significant as a demonstration of the era of air travel in which we live, and as the opening and closing chapter to many individual journeys of significance to migrants and travellers to and from Adelaide and South Australia more broadly.

Consideration of sub-cultures and understanding what is significant to different age groups and/or cultural, ethnic and religious backgrounds or sub-cultures based on interests could also benefit this policy. Fr example a skate park may carry significance for youth culture, while a library may be recognised as a place of cultural significant as a support centre and for the range of services to newly arrived migrants.

The importance of recognising oral cultural traditions and customs- which are not represented by a building or structure has not been captured.

SPP7 also fails to consider the concept of a process of recognising 'modern heritage'- that is the significant events and places of the current era which will be tomorrow's historical heritage.

STATE PLANNING POLICY 8: PRIMARY INDUSTRY

Objective

A diverse and dynamic primary industry sector making the best use of natural and human assets.

Policies

1. Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.

2. Create local conditions that support new and continuing investment in primary industry while seeking to promote co-existence with adjoining primary industries and avoid land use conflicts.

3. Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction, and restructuring.

4. Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.

Response to SPP 8

City of West Torrens does not wish to provide a response to SPP 8.

STATE PLANNING POLICY 9: EMPLOYMENT LANDS

Objective

Employment lands are protected from encroachment by incompatible development and are supported by appropriate transport systems and infrastructure.

Policies

1. Enable opportunities for employment that are connected to, and integrated with, housing, infrastructure, transport and essential services.

2. Support state-significant operations and industries and protect them from encroachment by incompatible and/or more sensitive land uses.

3. Support and promote adaptable policies that allow employment markets to evolve in response to changing business and community needs.

4. Promote new, latent and alternative employment by enabling a diverse range of flexible land use opportunities.

5. Protect prime industrial land for employment use where it provides connectivity to freight networks; enables a critical mass or cluster of activity; has the potential for expansion; is connected to skilled labour; is well serviced; and is not constrained by abutting land uses.

6. 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, while still maintaining the hierarchy of centre and retail development.

7. Support sustainable tourism where the social, cultural and natural values underpinning the tourism developments are protected to maximise economic growth.

8. Strengthen the primacy of the city centre as the cultural, entertainment, tourism and economic focus of Greater Adelaide. Enhance its role as the centre for peak legal, financial and banking services, specialty health and medical services, higher education, the arts, and high-quality specialty retailers that contribute to Adelaide City's attributes as a destination.

9. Encourage the development of vibrant employment and residential mixed-use precincts. where conflicts between uses can be managed.

10. Plan for employment and industrial precincts that improve economic productivity, are protected from encroachment, connect to efficient supply chains, and minimise transport impacts on existing communities.

Response to SPP 9

SPP 9 addresses the need to protect land for employment use as essential to promote job growth and diversity of businesses. The need to have employment land supported by appropriate transport systems and infrastructure so they can function efficiently and effectively is also cited in the policy. The expression of policies in this SPP may be enhanced as per underline and strike-through text edits as above.

There are types of employment that are no longer attached to land use and therefore this SPP requires policy to address the changing nature of employment generators.

Policy 1

Policy 1 emphasises that for employment land to succeed, opportunities need to be created for connectivity and integration with housing, infrastructure, transport and essential services.

Policy 3

Recognition is given that businesses and community needs may change over time or rapidly, and the policy will be required to be adaptable. The need for policy to be flexible and supportive for new forms of employment which has not been envisaged as requiring employment land is supported.

Policy 5

The need is identified to maintain large areas of industrial land that has potential for development and expansion, established connectivity to transport, available labour and does not conflict with adjacent land uses.

Policy 7

Further consideration is required regarding planning for potential impacts associated with *maximising* the growth of key tourism providers - such as Adelaide Airport. This potentially conflicts with provisions of SPP 11 which state, "minimise negative transport-related impacts on communities and the environment."

Policy 8

Policy 8 cites the requirement to strengthen the Adelaide City Centre as the cultural, entertainment, tourism and economic focus of Greater Adelaide. However omits to identify the city as a sporting precinct. CWT is of the view that the primacy of the CBD need not be confined to the Adelaide CBD, but could benefit from expanding to surrounding inner metropolitan areas.

STATE PLANNING POLICY 10: KEY RESOURCES

Objective

Key resources continue to contribute to our state's economy and provide valued employment opportunities.

Policies

1. Define and protect mineral resources operations, associated infrastructure and undeveloped mineral resources from encroachment by incompatible land uses.

2. Plan for and implement development in the vicinity of undeveloped energy resources, energy resources operations and associated infrastructure to ensure their ongoing safe and efficient operation.

3. Identify and maintain strategic transport corridors and other key infrastructure required to support resource sector activities and their supply chains.

Response to SPP 10

City of West Torrens does not wish to provide a response for SPP 10.

STATE PLANNING POLICY 11: STRATEGIC TRANSPORT INFRASTRUCTURE

Objective

Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and business.

Policies

1. Enable an efficient, reliable and safe transport network connecting business to markets and people to places (i.e. where they live, work, visit and recreate).

2. Promote development that ~~maximises~~ <u>optimises</u> the use of existing and planned investment in transport infrastructure and services.

3. Enable equitable contribution <u>from developers</u> towards the provision of transport infrastructure and services to support land and property development.

4. Support the long-term sustainability and management of transport assets and the various modes that use these assets.

5. Minimise negative transport-related impacts on communities ~~and~~ the environment <u>and sensitive land uses</u>.

6. Enable and encourage the increased use of a wider variety of transport modes including public transport, walking and cycling to facilitate a reduced reliance on private vehicle travel.

7. Allow for the future expansion and intensification of strategic transport infrastructure and service provision (corridors and nodes) for passenger and freight movements.

8. Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).

9. Enable development that is integrated with and capitalises on existing and future transport functions of transport corridors and nodes.

10. Plan development to take advantage of emerging technologies, including electric and alternative fuel vehicles, autonomous vehicles and on-demand transport opportunities.

Response to SPP 11

Objective
The objective for SPP11 is somewhat clumsily expressed. Perhaps consider rewording to:
Provisions for existing and future transport infrastructure, services and functions are integrated with land use development policies to preserve and enhance safe, efficient and reliable transport connectivity that services the needs of people and business.

However, it is unclear if this objective is indicating that separate transport planning will not occur- and that planning for transport functions and services will only exist as a part of 'land development policies' /land use planning. The role of separate transport planning should

continue but would ideally be recognised and integrated within land use planning policy (refer SPP1- Integrated Planning).

Additional editorial and expression enhancements as per underline and strikethrough text edits in text above.

Policy 1

The efficiency of the transport network is constrained by the current congestion experienced at many of the key intersection nodes in the City of West Torrens (CWT).

There are several key arterial roads in the CWT: Anzac Highway, Richmond Road, Sir Donald Bradman Drive, Henley Beach Road, Tapleys Hill Road, Marion Road, South Road and Port Road/East Terrace. The DPTI intersection capacity data, provided as part of the 'Operation Moving Traffic Plan', shows that most of the key intersection nodes along these major roads are already at, or beyond, capacity. As more and more developments are encouraged by the State Planning policies, the conditions of the DPTI road network can only get worse.

On the one hand, policy encourages new development on transit corridors but on the other hand there does not appear to be a considered plan to invest in upgrades to the network. It would appear that the outcome sought by the policies is based on the hope that there would be a modal shift that would occur within a short period of time. To date, this has not seemed to be the case.

Consideration should be given to multi-modal transport when planning for integrated transport networks.

Policy 2

Use of careful language in the policies may assist achieve community acceptance of certain concepts. 'Maximising' implies greater numbers or quantity which may be a deterrent, where use of the term 'optimising' may be preferable as it implies a better outcome, rather than a larger quantity.

As previously noted, while maximizing/optimising the use of existing transport infrastructure and service is desirable and supported, unless these services continue to provide an attractive alternative for users, the outcome sought would not be achievable. The capacity constraint of the tram service is one example where the constraint would eventually deter people from this mode of transport.

The policy also requires some acknowledgement of the end user's requirements with regard to modal shift, and encourage transport nodes with park and ride facilities.

The airport is a key factor in the transport network and will be undergoing a major expansion in the near future. Consideration of how development around the airport will be managed is required, particularly given the Federal Government's proposed Public Safety Zones at Ends of Airport Runways.

Policy 3

Upgrades of the transport routes would generally occur along the immediate frontages of a development site. The City of West Torrens would be keen to see how the Government would look at this equitable contribution issue associated with land and property development, assuming that the contribution includes developers and should be stated.

Policy 4

Clarification is required as to what 'long-term sustainability' means in the context of intersection capacity issues, modal shift objectives/ targets and how these can be achieved, and future changes to transport (eg smart technology).

Policy 5

The CWT is already experiencing negative transport-related impacts. One such impact is the overflow parking from new developments. While higher density developments are supported along major transport corridors, the Government should elaborate on how minimizing the impacts can be achieved, for example given the experience of CWT with respect to overflow parking.

In addition, traffic around sensitive land uses such as child care centres would also need to be considered.

This policy sets the ambition to "minimise negative transport-related impacts on communities and the environment", however provides limited guidance on mitigating potential hazards relating to aircraft movements associated with the Adelaide Airport, preferring to focus only on building heights through the identification of the Obstacle Limitation Surface layer (as identified in the non-statutory Guidance Notes).

In the event that it is deemed inappropriate to address this type of hazard through SPP 16 Emissions and Hazardous Activities, it is suggested that further provisions be provided in SPP 11 related to strategic transport infrastructure and/or a separate SPP specific to Airport operations be incorporated into the suite of State Planning Policies.

Note: Council reserves its position on how such policy is to be implemented through various mechanisms until such time as the results of the 600+ responses to the *Experiences of Aircraft Noise Survey* can be comprehensively analysed.

Policy 6

This policy would only work if the alternative modes of transport are conveniently and readily available. The CWT already has a very extensive bicycle network that provides convenient access to and from the CBD and to other recreational areas and beyond.

There also needs to be a re-evaluation of whether public transport services have kept pace with the modal shift outcome sought by 30-Year Plan. If there is capacity constraint issues in the public transport network, this would discourage rather than encourage the use of public transport.

Policy 7

The concept behind policy 7 is supported. As an example, the CWT has previously identified that Morphett Road, north of Anzac Highway, and Richmond Road, west of Marion Road, could become key new DPTI managed roads to provide alternatives to Marion Road and Sir Donald Bradman Drive to the Adelaide Airport and to accommodate freight routes into a part of the Airport where significant commercial and industrial developments are planned in the future. There have been a number of previous submissions from the CWT to DPTI and the Minister of Transport for this to occur.

Policy 8

The concept behind policy 8 is supported. As an example, the key corridors and intersection nodes have already been identified for the CWT as part of the OMT Plan, There are two

OMT Plans being prepared for Henley Beach Road and Sir Donald Bradman Drive in a joint project between DPTI and CWT. At this stage, implementation of some of the measures are being undertaken and an assessment of the outcomes versus the objectives would be undertaken at a later stage. The OMT Plans seek to improve the road conditions for all modes of transport and for all periods of the day, unlike previous approaches which tended to focus on peak hours only.

Policy 9

The current Urban Corridor Zones in the CWT are very lineal in focus, for example along Anzac Highway, Henley Beach Road and Port Road. For the <u>predominantly residential</u> developments with some mixed uses on the ground level, the lineal form of developments seems to suit the transport corridor arrangement by enabling convenient access to bicycle lanes and public transport services. Access to these forms of developments are not as critical, given the relatively low traffic generating nature of the residential land uses.

For mixed use development that are <u>predominantly retail or commercial</u> in nature, these tend to be generally located on major arterial intersections along the transport corridors for reasons of accessibility. The difficulty arising from locating these major traffic generating land uses at intersection nodes is that there is immediate impact on these already congested intersections. While there is no clear solution to this kind of issue, the State Planning Policies, in encouraging this form of development on major intersection nodes, should also have a plan in place to address the congestion issues they exacerbate.

Policy 10

The emerging technologies promoted through policy 10 are supported and would help change travel behaviour in the long term. Some acknowledgment should be provided in the new planning system to encourage and provide for electric charging points in car parks, and drop off points designed to optimise efficient autonomous vehicle movements. Parking related technology should also be encouraged.

STATE PLANNING POLICY 12: ENERGY

Objective
The ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business.

Policies

1. Support the development of energy assets and infrastructure which are able to manage their impact on surrounding land uses, and the natural and built environment.

2. Support and promote ~~alternative~~ <u>renewable</u> sources of energy supply <u>such as solar and wind</u> ~~at the neighbourhood level~~.

3. Facilitate access to strategic energy infrastructure corridors to support the interconnection between South Australia and the National Electricity Market.

4. Ensure development in the vicinity of major energy infrastructure locations and corridors (including easements) is planned and implemented in such a way as to maintain the safe and efficient delivery and functioning of the infrastructure.

5. Ensure renewable energy technologies ~~support~~ <u>become</u> a stable energy market and <u>provide</u> continued supply ~~and do not adversely affect the amenity of regional communities~~.

Response to SPP 12

Objective
The objective of the policy is succinct and strong, and has a firm emphasis on the provision of sustainable energy.

There appears to be a disconnect between the objective of the policy and its sub-policies. The policy should require that energy efficiency and reduction of carbon emissions be a priority when considered against other factors when choosing energy generation. As such, associated infrastructure for the provision of renewable energy should be developed to ensure this.

Policies
There should be a policy focused on the need to move towards renewable energy, and a requirement on investment to achieve stable power supply through this technology.

A policy should be included to encourage emerging renewable technologies e.g. battery storage, to be integrated/considered at the design and planning stage of new developments.

This could be supported by incentives for existing building owners to undertake energy efficiency measures and install renewable energy in order to benefit tenants and the wider community.

Further editorial and expression enhancements as per underline and strikethrough edits in text above.

STATE PLANNING POLICY 13: COASTAL ENVIRONMENT

Objective

Protect and enhance the coastal environment and ensure that development is not affected by coastal hazards.

Policies

1. Ensure development is not at risk from current and future coastal hazards (including coastal flooding, erosion, inundation, dune drift and acid sulphate soils) consistent with the hierarchy of avoid, accommodate and adapt.

2. Balance social and economic development outcomes in coastal areas with the protection of the environment.

3. Protect and enhance the natural coastal environment and its resilience to a changing climate, including environmentally important features, such as mangroves, wetlands, sand dunes, cliff tops, native vegetation and important habitats.

4. Locate development in areas that are not subject to coastal hazards unless the development requires a coastal location and suitable hazard mitigation strategies are in place, taking into account projected sea level rise and coastal retreat.

5. Facilitate sustainable development that requires a coastal site, including eco-tourism, aquaculture, marinas and ports, in areas adjoining the foreshore, where environmental impacts can be managed or mitigated.

6. Maintain or enhance the scenic amenity of important natural coastal landscapes, views and vistas.

7. Ensure development maintains and enhances public access to coastal areas with minimal impact on the environment and amenity.

8. Locate low intensity recreational uses where environmental impacts on the coast will be minimal.

Response to SPP 13

Objective
The objective of the policy is succinct and strongly emphasizes a need to protect and enhance our coastal environments.

Policy 1
Ensuring development is not at risk from hazards is not a realistic expectation/outcome. Reword to: 'Mitigate the risk of hazards on existing development…' (if that is the intention of this policy) . However, unless zoning is changed to prevent further development occurring along vulnerable coastlines, the risk will continue (and will increase).

Policy 3
The natural coastal environment is based on natural processes such as sand movement along the coast. Such processes create and impact environmental features either by depositing sand or by removing sand. These processes will be affected by climate change.

This policy is suggesting modifying and therefore changing the natural coastal environment. It is therefore unclear of the actual intention of this policy. It is suggested to reword the policy to: 'Protect coastal environments such as mangroves, dunes, cliffs and native vegetation to help reduce the risk of erosion and loss of sand arising from wave damage.'

STATE PLANNING POLICY 14: WATER SECURITY AND QUALITY

Objective

South Australia's water supply is protected from the adverse impacts of development.

Policies

1. Provide for the protection and security of the state's water supply to support a healthy environment, vibrant communities and a strong economy.

2. Prioritise the protection of water supply catchments including:
   a) The Mount Lofty Ranges Watershed
   b) Water Protection Areas under the Environment Protection Act 1993
   c) The River Murray Protection Area under the River Murray Act 2003
   d) Prescribed water resources and wells under the Natural Resources Management Act 2004.

3. Provide for infrastructure and land use policy that aims to decrease flood risk and improve water quality and urban amenity.

4. Ensure ~~our~~ the state's water supply, stormwater and wastewater infrastructure meets the needs of a growing population and economy while balancing environmental outcomes.

Response to SPP 14

Objective
The objective is considered limited and simplistic. The objective should have a greater emphasis on drought resilience and minimising the environmental impacts of stormwater runoff.

Policy 3
While Water Sensitive Urban Design is implied through policy 3, a more direct mention of the incorporation of WSUD into infrastructure would be beneficial. It is also considered valuable to include a policy regarding incorporating water sensitive urban design elements into new developments and retrofitting into existing areas.

Policies
Consideration should also be given to the inclusion of a policy focusing on the importance of infrastructure for alternative water sources to reduce reliance on potable water e.g. aquifer storage and recovery, and retention systems.

Editorial and expression enhancements as per underline and strike-through text edits above.

STATE PLANNING POLICY 15: NATURAL HAZARDS

Objective

Communities and developments are protected from the adverse impacts of natural hazards.

Policies

1. Identify and minimise the risk to people, property and the environment from exposure to natural hazards including bushfire, terrestrial and coastal flooding, erosion, dune drift and acid sulphate soils.

2. Design and plan for development in accordance with a risk hierarchy of avoidance, adaptation and protection.

3. Locate critical infrastructure such as hospitals, telecommunications, transport systems and energy and water services in areas that are not exposed to risk from natural hazards.

4. Mitigate the impact of extreme heat events by designing public spaces and developments to create cooler micro-climates through the use of green infrastructure.

5. Protect key coastal areas and critical infrastructure at risk from sea level rise, coastal erosion and storm surges.

Response to SPP 15:

The SPP's objective and sub-policies are generally clearly worded and support each other. Editorial and expression enhancements as per strike-through text edits above. Other comments on expression and ability to implement policy as shown below.

Objective
Use of the term 'developments' in the plural form, in the objective of SPP 15, implies during development or construction phase only, while use of the singular 'development' in this context would appear to cover post-construction phase also. Use of the singular term 'development' is consistent with expression used in other SPP Objectives.

Policy 2 and 3
While policies 2 and 3 present admirable intentions, in many areas, this may not be possible. Critical infrastructure is still required in areas where natural hazards (such as flooding) exist and therefore, design will become more important in line with the protection aspect of the risk hierarchy.

Policy 4
Policy 4 assumes that all development(s) have the potential to include green infrastructure and that there are sufficient public spaces to create micro-climates. As can be seen from the urban heat mapping project, areas of higher density have significantly higher average surface temperatures. It is difficult to see how this trend will be changed to meet the aims of this policy.

STATE PLANNING POLICY 16: EMISSIONS AND HAZARDOUS ACTIVITIES

Objective

Communities and the environment are protected from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.

Policies

1. ~~Ensure~~ Our communities and the environment are protected from risks associated with emissions and radiation activities while ~~ensur~~ seeking that industrial and commercial infrastructure development remains viable through:
   a) ~~Ensuring~~ appropriate zoning and mixed uses only where compatible ~~are compatible~~
   b) adequate separation distances for industrial sites that prevent ~~Avoiding establishing~~ incompatible land use interfaces ~~through encroachment on industrial sites by maintaining adequate separation distances~~
   c) ~~Incorporating~~ engineering controls incorporated into building design where emissions or impacts ~~are~~ can be addressed through such measures. ~~unavoidable.~~

2. ~~Ensure~~ Risk posed by known or potential contamination of sites is adequately assessed and managed to enable the ~~appropriate~~ proper development and safer use of land.

Response to SPP 16

The general premise of this SPP is to protect industry from encroachment of residential land uses, and protect communities from hazards and contamination. There is potential for this SPP to consider hazards in a broader context, not limiting the hazards considered, to those experienced in association with 'industrial' land uses.

Greater protection of communities would be afforded by broadening the concept of hazards to include emissions other than those linked to industry. Such inclusions may relate to exhaust emissions along major transport routes, and the potential aviation fuel, odour and noise emissions from aircraft associated with take-off and landing and general flight paths on the approach and take-off from Adelaide Airport.

Feedback received through Council's *Experiences of Aircraft Noise Survey* indicated some residents under the flight path noted the visible accumulation of aviation fuel droplets and vapour soot in outdoor areas, and the potential for these emissions to end up in rainwater tanks and/or affect vegetables and fruit grown on properties under the flight path(s).

To address this through an SPP (whether SPP 16 or SPP11, or separate SPP specific to aircraft operations) would require some coordination of the state and federal planning systems, and at the very least acknowledgement of the major commercial hub that is the Airport Business District.

As with the possible implementation of Public Safety Zones (another potential hazard associated with the Airport), the CWT is of the view that the implementation of such 'hazard identification' policy is the responsibility of the State Government and not Council. Consequently, some acknowledgement of the Airport Business District and associated hazards relating to aircraft movements should be identified through the State Planning Policies.

Council reserves its position on how such policy is to be implemented through various mechanisms until such time as the results of the 600+ responses to the *Experiences of Aircraft Noise Survey* can be comprehensively analysed.

In the event that it is deemed *inappropriate* to address this type of hazard through SPP 16, it is suggested that further provisions be provided in SPP 11 related to strategic transport infrastructure and/or a separate SPP specific to Airport operations be incorporated into the suite of State Planning Policies.

It is noted that SPP 11, Strategic Transport Infrastructure policy 5, sets the ambition to "minimise negative transport-related impacts on communities and the environment". However SPP 11, provides limited guidance on mitigating potential hazards relating to aircraft movements associated with the Adelaide Airport, preferring to focus only on building heights through the identification of the Obstacle Limitation Surface layer (as identified in the non-statutory Guidance Notes).

Further editorial and expression enhancements as per underline and strike-through text edits above.

Policy 1 and 2
The policies in SPP 16 express a desire to "ensure" communities are protected; "ensuring" zoning and mixed uses are compatible; and "ensure" safe use of land; it is considered that it is over-reaching for policy to state that it will **ensure** any of these aims. Instead the expression may be enhanced as suggested above.

Policy 2
Policy 2 speaks of "safe use of land" which, despite best efforts cannot be 100% guaranteed, therefore it is suggested the expression "safe**r** use of land" may be more appropriate.