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Ref: KR:dp
CC16/1174

6 September 2018

Planning Reforms Manager
Department of Planning Transport and Infrastructure
GPO Box 1815
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Dear Sir/Madam

Re: Draft State Planning Policies for South Australia

Please find below the Town of Gawler's response in relation to the Draft State Planning Policies for South Australia released in July 2018 for public consultation. We have endeavoured to accumulate feedback from Council Staff and Elected Members to provide professional and meaningful comment regarding these proposed policies.

Below comments are presented under each of the Draft State Planning Policy headings provided in the document:

State Planning Policy 1: Integrated Planning

Policy 5 – It would be beneficial if this policy included references to areas of biodiversity significance also being protected from urban growth. Although there is a separate policy heading relating specifically to biodiversity, the reference would appear fitting in this context.

State Planning Policy 2: Design Quality

Policy 8 – The policy 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. Reference could also be made to appropriate and quality material choice. Material choice plays a crucial role in achieving quality design outcomes and can have an enormous effect upon a building's longevity, energy efficiency, appearance etc.

State Planning Policy 3: Adaptive Reuse

Policy 1 – The policy refers to removing barriers to encourage innovative and adaptive reuse of historic buildings. What are these barriers? Are they planning, economic or building? Some of these barriers cannot or should not be removed. The wording is not clear and leaves a great deal open to interpretation.

Policy 4 – Speaks to prioritising adaptive reuse specifically in the City of Adelaide and other mixed use precincts. It is appreciated that the City of Adelaide likely contains a greater number of heritage listed and significant buildings, in comparison to most other Council areas however, all Councils wish to see their historical buildings appropriately utilised, maintained and enjoyed. For instance the Town of Gawler was South Australia's first regional settlement. Gawler and Adelaide are the only two South Australian settlements that were surveyed by Colonel William Light. The Gawler community recognises and highly values this cultural heritage and remains steadfast in its desire to protect and reinforce its unique character.

State Planning Policy 4: Biodiversity

Although mentioned in State Planning Policy 5, reference could be made in State Planning Policy 4 to encouraging greater design outcomes with the goal of generating energy efficient buildings. By promoting greater energy efficiency via orientation, materials etc. and thus reducing energy consumption and our impact upon the environment, we are supporting 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 (Goyder Line suspected to be shifting south) as the anticipated climate becomes hotter and drier. Further mention could be made here in relation to protecting valuable farming lands and ensuring food security is included into this section of the State Planning Policy.

State Planning Policy 6: Housing Supply and Diversity

Policy 2 – The policy speaks to a timely supply of land for housing that is integrated with and connected to a range of services and facilities. The background information supports this by stating that land for housing can be provided through coordinated land releases, urban renewal and infill development. As the 30 Year Plan for Greater Adelaide identifies a clear preference towards urban renewal and infill development, it may be appropriate to include some commentary around this preference over Greenfield developments.

Policy 3 – This policy is supported by Council as it promotes the centric growth of Regional Centres in preference to ribbon and sprawled development, which generally creates small pocket communities and results in a sense of detachment through a lack of suitable facilities and infrastructure as well as largely promotes complete car dependence.

Policy 7 – Affordable housing is an undoubtedly important matter and this policy speaks to providing planning incentives and concessions to promote such developments. Providing planning incentives is a good way of encouraging developers to deliver affordable housing, however it should not be at the expense of good design outcomes. Perhaps this policy could note that quality design outcomes should not be overlooked when seeking to provide planning 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, is it the role of planning to try stimulate competition? Also at what expense to the community should land be made available for retail purposes?

We have recently seen large retailers wishing to purchase areas traditionally used for open space for conversion to commercial use. Significant retail activities should be focussed close to existing city centres and neighbourhood hubs where competition in fact already exists and would be amplified. Stand-alone pockets of retail activity, which in fact promote consumers to travel significant distances between large scale retailers and potentially away from once busy centres, should be discouraged.

This response is not meant to be interpreted as anti-growth; it is simply saying development should be truly integrated in all senses of the word.

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.

Although undoubtedly vital to the State’s future prosperity, there are circumstances where mining is inappropriate due to likely poor environmental outcomes or even the consumption of farming land which would in fact be likely to provide longer term employment and food security.

There are environmentally orientated policies within this document which would hopefully seek to stop inappropriate mining activities however, 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 appear to promote development within close proximity to existing and planned transport routes/corridors/nodes etc. This direction is supported however, due to the policies being so similar they could be amalgamated or one be potentially redrafted to provide a greater emphasis on promoting mass public transit e.g. rail and bus services.

Policy 6 – This policy encourages a wider variety of transport modes including active travel to reduce reliance and use of private motor vehicles. Although a fundamental and positive policy, the wording is fairly soft in nature and provides little genuine or practical direction for the development of the Code or for practitioners to utilise in planning for more active neighbourhoods. 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*'.

This policy can barely be considered aspirational. It is agreed that renewables should not adversely impact the amenity of regional communities. Renewables should play a greater role than simply supporting a stable market.

With the effects of climate change already being felt around the globe and a large number of policies within this draft document proposed to help offset these effects, renewable energy should be our most sought after form of energy and this policy should encourage this outcome.

State Planning Policy 13: Coastal Environment

The Town of Gawler does not have any coastal environment within its boundary and thus our feedback may be limited in this regard. However, reading through the policies, *Policy 4* is unclear and almost redundant. What sort of developments require a coastal location? Are we talking about marinas and ports or hotels?

With such little direction, an argument for a development requiring a coastal and potentially hazardous location could be easily generated. This policy is unlikely to be of much benefit to the people who plan for and deal with applications along the coastline; greater detail and assertion is required here.

State Planning Policy 14: Water Security and Quality

The preservation of water security and quality may in fact be insinuated through the policies when reference is made to supporting 'a healthy environment' or 'balancing environmental outcomes'.

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. A mention of environmental flows as a part of supporting a healthy environment could be positive.

State Planning Policy 15: Natural Hazards

As explained through the discussion section of the Natural Hazards section, 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 generated to speak to the appropriate response to sudden and heavy rainfall events. Promoting efficient discharge/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. The Town of Gawler is supportive of such policies to assist with planning for industrial activities and the effect which they can have upon the environment and their neighbours.

Yours faithfully



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