



OFFICE OF THE LORD MAYOR

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14 Sep 2018

DPTI

Mr Tim Anderson QC  
Chair  
State Planning Commission  
GPO Box 1815  
ADELAIDE SA 5001

Dear Mr Anderson,

**RE: Response to Draft State Planning Policies**

The City of Adelaide values and appreciates the opportunity to comment on the Government's "Draft State Planning Policies" which set the policy directions intended to be effected through the spatial planning system.

Council recognises that these policies will form the highest order policy document in South Australia's planning system and congratulate the Government on preparing a robust and comprehensive suite of policies for consultation.

To provide context, I draw your attention to the Government's bipartisan directions for Planning Reform which were agreed upon in 2015 in response to the final report and recommendations of the Expert Panel on Planning Reform. In relation to "*Reform 5 – Create in legislation a new framework for State Directions*", the intended planning reform was for State Planning Policies to:

- "*Facilitate a clear line of sight from state-wide Government priorities and policies to on-ground decisions and actions;*
- *Help resolve persistent issues such as integration of natural resource management and affordable housing policies into the planning system; and*
- *Enable the simplification and rationalisation of other statutory and non-statutory policy document."*

Council's response to the Draft State Planning Policies has been prepared following consideration of the SPPs, with consultation across Council's administration, with feedback from elected members and with an understanding of our community's perspectives and aspirations.

I am concerned that the Draft State Planning Policies, in their current form, lack sufficient elucidation of the Government's vision to provide a "clear line of sight".

I am also somewhat disappointed that initial community engagement on the State Planning Policies has not occurred in the spirit of the Act's "Community Engagement Charter" to enable, encourage and value community and business input into the policy creation stage, rather than during development assessment.

Specific feedback on individual Draft State Planning Policies is provided in the attached Table 1, however key comments include:

### Opportunities to Strengthen the State Planning Policies

The State Planning Policies could be strengthened by:

- More effectively communicating an integrated state-wide vision and commitment to providing a spatial structure for future growth.
- A commitment to ensuring affordable housing targets result in the provision of housing for those in need and significantly reduce homelessness.
- Better integration of natural resource management into the planning system.
- Explicit inclusion of the key role of waste management in planning and development.
- Explicit inclusion of social infrastructure within the definition of infrastructure to ensure the social infrastructure required by communities, such as schools, community facilities, etc. is provided via planning and development mechanisms.
- Strengthening the requirement for Universal Design to be embedded within and across all policies.
- Further consideration of whether the State Planning Policies will achieve the stated targets.

### Policy 1 – Integrated Planning

- There is a key opportunity to more explicitly require integration across all State Planning Policies.

### Policy 2 – Design Quality

- Policy 2.2 should “ensure” rather than simply “promote” best practice in access and inclusion planning in the design of buildings and places.
- A new policy should be created to focus explicitly on Water Sensitive Urban Design, Environmentally Sustainable Design-- these topics appear to be incorrectly located within a policy on access and inclusion.
- Specific requirement for planning and development to be specifically designed to minimise and mitigate climate change is needed within this suite of policies.
- Consider whether building safety is adequately embedded within the State Planning Policies.

### Policy 3 – Adaptive Reuse

- Additional research should be undertaken by State Government to more clearly define the problem and clearly define the interventions that are being sought from planning system.

### Policy 5 – Climate Change

- Some mechanisms and tools need to be mandated in order to achieve targets in an effective timeframe.

### Policy 6 – Housing Supply and Diversity

- Specific reference to Universal Design is essential.
- A commitment to ensuring affordable housing targets result in the provision of housing for those in need and significantly reduce homelessness

### Policy 7 – Cultural Heritage

- There is considerable opportunity to revise and strengthen this policy as noted in the attached table, including:
  - the need for a specific focus on built heritage, fostering cultural vitality, protecting cultural landscapes, and
  - opportunities to work with First Nations peoples to undertake cultural mapping to understand cultural heritage sites and areas of significance.

### Policy 9 – Employment Lands

- Maintaining and reinforcing retail in the City of Adelaide is a vital element of the State Planning policy and needs further emphasis, to maintain the primacy of the City of Adelaide as a highly accessible hub with a growing residential population and with a key role for visitors, workers and tourism.

### Policy 11 – Strategic Transport Infrastructure

- The wording of policy 11.3 is ambiguous and could be clarified to determine if it is intended to promote “equity of access to transport infrastructure and services for communities” or “equitable contributions to transport infrastructure and services by developers”.
- Policy 11.2 should place greater emphasis on encouraging active transport modes to realise significant community, health, economic and environmental benefits.

### Policy 12 – Energy

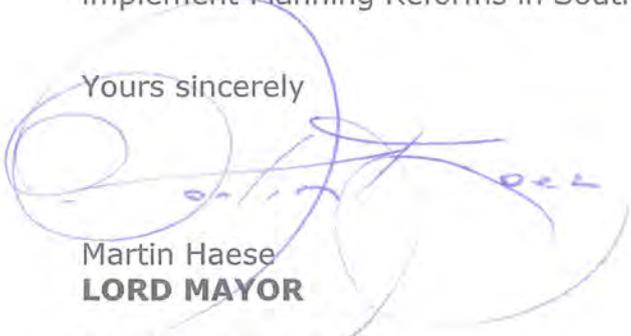
- This policy should explicitly seek to achieve greenhouse gas/emission reductions to mitigate climate change impacts and minimise short- and long-term risks.

### Policy 13 – Coastal Environment

- This policy is designed to protect and enhance the coastal environment, and could be enhanced via better recognition of the cumulative impact of development on coasts from upstream development. The City of Adelaide Strategic Plan seeks to improve the ecological value of watercourses and biodiversity in the Park Lands, and seeks to reduce stormwater runoff and pollution into the River Torrens through integrated catchment management and water sensitive urban design.

The City of Adelaide has much value to add to the Commission and the Government’s vision and process. As such, I invite the you to meet me to share the Council’s concerns and convey the feedback received from the city community, in the spirit of working towards an improved approach to work collaboratively to progressively implement Planning Reforms in South Australia.

Yours sincerely



Martin Haese  
**LORD MAYOR**

12 September 2018

## RESPONSE TO DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

Table 1 Comments on Draft State Planning Policies for South Australia

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p><b>GENERAL COMMENTS</b></p>	<p>Overall, the combined State Planning Policies will enable the achievement of many of the City of Adelaide Strategic Plan’s “Smart, Green, Creative and Liveable” Objectives and associated actions. This document highlights potential gaps and improvements that should be made to the Draft State Planning Policies.</p> <p><b>Vision</b></p> <p>The overall suite of policies could benefit from more compelling communication of an overall vision and purpose for the state.</p> <p><b>State Planning Policies/Regional Plan</b></p> <p>Consideration could be given to the most appropriate “level” of State Planning Policies.</p> <p>Overall the policies are considered to be sufficiently “enabling”, and more detailed policy direction will be expressed at a “Regional Plan” and “Planning and Design Code” level.</p> <p>The existing 30 Year Plan for Greater Adelaide will serve as the interim “Regional Plan” for the City of Adelaide, however the next level of policies – the Planning and Design Code – will be prepared and operating before any new Regional Plan is developed.</p> <p>There is an opportunity for the new Regional Plan, when developed, to provide a greater level of direction and support for integrated planning than the 30 Year Plan for Greater Adelaide currently provides.</p>

**Gaps**

Recognising there are many considerations relating to planning and development across the state and that the draft policies go a long way to attempting to provide certainty and balance sometimes disparate objectives, it is noted that there may be some potential gaps. These gaps include:

- A need to communicate a state-wide vision and commitment to providing a spatial structure for future growth.
- Affordable housing targets and a commitment to ensuring they result in the provision of affordable housing to those in need.
- There is an enormous opportunity to encourage world-leading and effective waste and recycling practices in planning and development in South Australia, which is currently omitted from the draft policies. Effective and innovative waste management is important in the City of Adelaide (transport, noise, storage, reuse, recycling, resource recovery, clean tech, air and water quality, community amenity, business efficiency etc.).
- Opportunities for interaction between the PDI Act and other current and proposed legislation, particularly with respect to referrals and shared objectives.
- Strengthening the expectation for coordinate with existing and future government department strategies and operations, and integration between the 16 policies.
- Potential consideration of how to resolve conflicts between competing State Planning Policies at the Regional Planning stage, rather than at the development assessment stage.
- There may also be potential to include an additional policy, to fast-track achievement of the stated target “A green liveable city – urban green cover is increased by 20% in Metropolitan Adelaide by 2045”.
- Other gaps and opportunities in the Draft Policies are discussed against the relevant policy in this table.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p><b>Editorial Suggestion</b></p> <p>Sub-policies could be numbered to enable easy reference to “lead policy” e.g. Policy 13.3 instead of Policy 13, dot point 3 enable easy reference.</p> <p>Aligns with City of Adelaide Strategic Plan 2016-2020 strategic objectives in relation to the green theme.</p> <p><b>How to interpret the SPPs</b></p> <p>It is noted on p.10 that Parts 3 and 4 of the document form a statutory function, however the table immediately below does not highlight this – this inconsistency should be amended to ensure the reader understands that “Part 3 – Principles of Good Planning” and “Part 4 – Our Targets” have a statutory function.</p>
<p><b>PRINCIPLES OF GOOD PLANNING</b></p>	<p>Principles of Good Planning should include "Responding to climate change" under Sustainability Principles. This language is used under the Draft State Public Health Plan. "Particular effort ... that respond to climate change and address implications of climate change".</p>
<p><b>TARGETS</b></p> <p>The Targets included in the Draft State Planning Policies are consistent with the 30-Year Plan for Greater Adelaide 2017 Update.</p> <ol style="list-style-type: none"> <li>1. Containing our urban footprint and protecting our resources             <ol style="list-style-type: none"> <li>1.1 85% of all new housing in metropolitan Adelaide will be built in established areas by 2045</li> <li>1.2 90% of all new housing in Outer Greater Adelaide will be built in the established townships and designated urban development areas.</li> </ol> </li> </ol>	<p>The legislated and/or intended timeframe for updating targets should be stated in the SPP document.</p> <p>It is assumed that these targets will be tracked, and further information on how this will be achieved will be forthcoming as the Planning Reforms are progressively implemented.</p> <p>The City of Adelaide is specifically referenced in the proposed targets, however the overall success of the whole state is important to the City. If statewide targets would be useful then these should be incorporated also, either now, or as part of the creation of revised regional plans.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>1.3 85% of all new housing in regional South Australia will be built within townships and defined settlements.</p> <p>2 More ways to get around 60% of all new housing (in) metropolitan Adelaide will be built within close proximity to current and proposed fixed lines (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045.</p> <p>3 Getting Active The share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide will increase by 30% by 2045.</p> <p>4 Walkable Neighbourhoods Increase the percentage of residents living in walkable neighbourhoods in Inner, Middle and Outer Metropolitan* Adelaide by 25% by 2045. *Established urban areas, including townships in Outer Metropolitan Adelaide.</p> <p>5 A Green Liveable City Urban green cover is increased by 20% in Metropolitan Adelaide by 2045.</p> <p>6 Greater Housing Choice</p> <p>6.1 Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045.</p> <p>6.2 Housing choice in regional cities and towns will increase by 10% to meet changing household needs in regional South Australia by 2045</p>	
<b>State Planning Policy 1 – Integrated Planning</b>	
<b>Objective:</b> Integrated planning is an essential approach for liveability, growth and economic development, maximising the	Supported, noting that planning and development in the City of Adelaide, as well as across South Australia will need to balance each of the State Planning Policies and

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>benefits and positive long-term impacts of development and infrastructure investment.</p>	<p>it is assumed that they will not be used in isolation of each other during future regional planning, preparation of the Planning and Design Code, and other uses of the State Planning Policies as anticipated by the <i>Planning, Development and Infrastructure Act, 2016</i>.</p> <p>Although the SPPs will not be used during development assessment (other than to inform the creation of the relevant assessment instruments), it is noted that the State Planning Policies will also be referenced in relation to Environmental Impact Assessments, special legislative schemes such as designated Character Preservation Areas (Barossa and McLaren Vale), basic and general infrastructure schemes, and are also referenced by the <i>Urban Renewal Act 1995</i> (in relation to establishment of precincts and precinct plans)</p> <p>It is also important that ‘infrastructure’ is understood broadly to include the social infrastructure that communities require, not just the physical infrastructure systems (roads, waste, energy, water etc). This is not clear from the definitions and use of the word ‘infrastructure’ across the SPPs. A useful definition of social infrastructure might be found on page 7 of <a href="https://www.lga.sa.gov.au/webdata/resources/files/2010_10_-_Project_Output_-_Implementation_Guide_%28February_2012%29_-_Development_of_Social_Infrastructure_in_Growth_Corridors.pdf">https://www.lga.sa.gov.au/webdata/resources/files/2010_10_-_Project_Output_-_Implementation_Guide_%28February_2012%29_-_Development_of_Social_Infrastructure_in_Growth_Corridors.pdf</a></p> <p>This objective aligns with the City of Adelaide’s City of Adelaide’s strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.</p>
<p><b>Policy 1.1:</b> Plan growth in areas of the state that are connected to, and integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions.</p>	<p>Supported, noting that this policy could be clarified by including specific reference to residential and community growth (or urban growth), if this is what is intended.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>To what extent has the State’s Integrated Transport and Land Use Plan been considered and what its future role will be.</p> <p>Will this policy protect long-term forward planning for proposed transport routes?</p>
<p><b>Policy 1.2:</b> 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.</p>	<p>Supported, and this policy needs to complement policy 1.1.</p> <p>Of relevance, the City of Adelaide Strategic Plan seeks to “advocate for an urban growth boundary that limits urban sprawl and promotes the City as the commercial, cultural, residential and social heart of metropolitan Adelaide”.</p>
<p><b>Policy 1.3:</b> 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.</p>	<p>Supported, with the following comments:</p> <ul style="list-style-type: none"> <li>• this policy needs to link with policy 1.1 above to ensure orderly and economic development, and</li> <li>• This policy relates to greenfields development, however this should also be balanced with well-planned redevelopment of already developed areas to help achieve other SPP objectives, such as primary industry, protection of key resources, provision of well-located employment lands, adaptive reuse, housing supply and diversity and strategic transport infrastructure.</li> </ul>
<p><b>Policy 1.4:</b> 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.</p>	<p>Supported, with the following edits:</p> <p>“Manage growth in an orderly sequence to enable the cost-effective and timely delivery of investment in infrastructure, <b>services and facilities</b> commensurate with the rate of population growth into the future.”</p> <p>Shocks and disruptions to South Australia e.g. caused by climate change, extreme weather events, global events, may disrupt such an orderly approach. State-coordinated resilience planning may assist this. The inclusion of ongoing resilience planning into the SPPs could assist “future-proofing” our state and the City of Adelaide.</p>

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<p><b>Policy 1.5:</b> Plan for urban growth to protect and preserve opportunities for high value horticulture, tourism and landscape character areas.</p>	<p>This policy appears to reinforce and potentially duplicate 1.2 and 1.3.</p> <p>Reword to “Ensure urban growth protects and preserves opportunities....” Possibly also include the words “and enhance/add to”</p>
<p><b>Policy 1.6:</b> Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.</p>	<p>Supported. This policy could also be improved by direct reference to supporting and/or enabling communities to thrive, and could strengthen reference to timely provision of social infrastructure. This policy will also support achievement of City of Adelaide’s Strategic Plan’s objective of being listed in the top three most liveable Cities in the World by 2020.</p>
<p><b>Policy 1.7:</b> Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced carparking to encourage greater use of active transport options such as public transport, walking and cycling.</p>	<p>Supported, with the following comments:</p> <ul style="list-style-type: none"> <li>• Assume “housing choice” refers to the provision of a variety of housing types.</li> <li>• Encouraging greater use of active transport should not be limited to activity centres, public transport nodes and strategic transport corridors.</li> <li>• reduced car ownership and reduced car parking may also result in an increase in need for delivery services for some occupants and this may need to be considered strategically. Edit the policy to include “open space” as follows:</li> </ul> <p><b>1.7:</b> Support housing choice and mixed-use development around activity centres, <b>open space</b>, public transport nodes and strategic transit corridors with reduced carparking to encourage greater use of active transport options such as public transport, walking and cycling.</p>
<p><b>Policy 1.8:</b> 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.</p>	<p>There is a need to conduct further planning and research to validate this approach to support effective and integrated planning within the City of Adelaide, recognising that higher density living, building cohesive communities and business infrastructure requires a more intense level of integration and well-considered planning.</p> <p>Suggest change “can be managed” to “are managed”.</p>

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	<p>Ensure access to the Park Lands is not compromised by ‘travel routes’ that negatively impact on high-rise living where it frames the Park Lands (e.g. the development of Bowden Village and the city by pass along Park Terrace is counterproductive).</p> <p>Consider the impacts of high-rise living on population diversity and the health and wellbeing of the City community (isolation, emergency management, access to outdoor space, interaction with nature, etc) and plan accordingly.</p>
<p><b>Comments on non-statutory elements of SPP 1:</b></p>	<p>p.21 Diagram of urban settlement types – This diagram is confusing and overly simplistic – not really representative of the urban form of Adelaide. Why are the outer suburbs described as “car dependent”? Many city workers live in outer suburbs. If these are not serviced by public transport there are traffic /congestion impacts on Adelaide City as well as the suburbs surrounding Adelaide and key transport routes. Improved public transport services for outer suburbs should be part of state transport planning and would be consistent with Targets 2 &amp; 3 of the SPP (p 16)</p> <p>p. 23 Non-statutory guidance notes for Integrated Planning - The Planning and Design Code should also require proponents of development to demonstrate that sufficient infrastructure, facilities and services are available (or can be provided) to facilitate integrated planning outcomes and well serviced communities. It is not sufficient to provide suitable zones. For example the cumulative impacts of infill development on available infrastructure and services need to be considered in planning processes to ensure liveability and quality of life is maintained and improved.</p> <p>p.27 Related Legislation and Instruments - Add Liquor Licencing Act and regulation regarding noise attenuation, Cultural Heritage Act, Native Title Act</p> <p>p. 34-35 Our People and Neighbourhoods - of the is an opportunity for more of the introductory material for the policies to be reflected in the policies themselves. People and Neighbourhoods is about more than housing and heritage.</p> <p>p 35, SPP 6.8, p 48, p 66 - Definitions of social infrastructure - There is an inconsistency in the language and definitions regarding social infrastructure,</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>community infrastructure, community facilities and services in the SPP that needs to be addressed.</p> <p>P 37 – Non-Statutory Guidance Notes for SPP6 - The Planning and Design Code will also need to ensure that services, infrastructure and facilities are coordinated with housing outcomes. Policies 6.2 and 6.8 will need appropriate expression in statutory policy so that they can be implemented.</p> <p>p. 40 - Our Productive Economy - This section does not address creative industries and the cultural economy. These make an important element in the City of Adelaide economy, and particularly relevant as the image selected for pp 40-41 is an iconic public art piece in the Central Markets. More is needed to address the contribution of planning to facilitating creative industries and cultural enterprise as per the City of Adelaide’s Cultural Strategy.</p> <p>p. 48 - Our Infrastructure and Movement Systems - This section states that “The integration of infrastructure and land use planning will deliver benefits such as ... improved accessibility to social and physical infrastructure to improve our standard of living” but this is not reflected in the SPPs which only address strategic transport infrastructure and energy infrastructure.</p> <p>There is a critical policy gap around social infrastructure planning and provision to align with housing and development. For example g schools, community facilities, a range of services etc are required where there is greenfields development, as well as infill development. These services and facilities can lag a long way behind community needs if not well planned and integrated with development. Proactive planning and coordination of social infrastructure has been shown to deliver health and wellbeing benefits for communities, savings for government and land efficiencies for developers.</p> <p>Across the document - There is little evidence of integration of the needs and opportunities of Aboriginal communities across this document. Local Aboriginal communities have vested interests and contributions to make to policy delivery of all policies, and including policies relating to biodiversity, land management, economic development, tourism, cultural heritage. and mapping of cultural opportunities and considerations around social infrastructure</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<b>State Planning Policy 2 – Design Quality</b>	
<p><b>Objective:</b> 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.</p>	<p>Supported, noting that there is potential for this policy to be more strongly worded to ensure this objective is met, however the broad principles are supported.</p> <p>The need to design “in context” should be strengthened.</p> <p>It will be important to reflect these policies carefully and effectively in the Planning and Design Code and applied to all development, from major buildings to sheds.</p>
<p><b>Policy 2.1:</b> Ensure plans encourage development that incorporates the Principles of Good Design.</p>	<p>Supported, with the recommendation that “ensure” is replaced with “require”.</p>
<p><b>Policy 2.2:</b> 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.</p>	<p>Supported, noting that it should be edited to read “ensure” rather than simply “promote” best practice in access and inclusion planning in the design of buildings and places. The PDI Act has a significant focus on universal design to ensure accessible built environments and this should be reflected in stronger wording of the SPP 2.</p> <p><i>“Crime Prevention through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design”</i> should be moved to a separate policy because they are not the means to address best practice in access and inclusion planning in the design of buildings and places.</p> <p>Technical corrections to Policy 2.2 will require the creation of a new policy. This could focus on a requirement to integrated design of development, including environmentally sustainable design, water sensitive urban design, and consideration of managing heat island effect etc. This is important in the urban context for multiple reasons, including community well-being, climate change risk-mitigation, catchment water quality (e.g. River Torrens), impacts on downstream coastal water quality, and landscape-scale biodiversity outcomes. There is little direction in the current policies</p>

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	<p>in relation to trees, landscaping and/or pervious/impervious areas in relation to development, other than reference to public spaces.</p> <p>There may also be potential to include an additional policy, to fast-track achievement of the stated target “A green liveable city – urban green cover is increased by 20% in Metropolitan Adelaide by 2045”.</p>
<p><b>Policy 2.3:</b> Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity.</p>	<p>Supported, and suggest “Crime Prevention through Environmental Design” could be referred to here instead of 2.2, or by re-writing 2.2 and 2.3 such that they are both coherent policies.</p> <p>Edit to include “and encourage social connection” because the design of public places can have a positive influence on social connectivity and this should be actively facilitated in the planning system. An example is location of public seating in groups to facilitate casual interaction and conversation:</p> <p><b>Policy 2.3:</b> Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity, <b>and encourage social connection.</b></p>
<p><b>Policy 2.4:</b> 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.</p>	<p>Supported, noting that this policy is critical, and with the following suggestions:</p> <p>Enable early and meaningful local government input/referrals on state assessed developments.</p> <p>Provide for the effective referencing of key reference documents for best-practice e.g. the City of Adelaide’s Urban Design Manual.</p>
<p><b>Policy 2.5:</b> Promote a culture of good design to foster creative thinking, innovation and effective design processes within the planning industry, allied fields and general public.</p>	<p>Supported, with the suggestion that this could be amended to promote a culture of “excellent” design – not just good, and that this policy should be strengthened by replacing the word “promote” with “ensure”</p>

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	City of Adelaide internal design review processes could also be encouraged.
<p><b>Policy 2.6:</b> Provide high quality, 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.</p>	<p>Supported, with the following comments:</p> <ul style="list-style-type: none"> <li>• It is important that open spaces are both accessible in terms of <i>distance/proximity</i> and designed to be accessible <i>within</i> the open space (e.g. level paths, universal design).</li> <li>• This policy refers to development in public realm, so how does this feed in to the Planning and Design Code unless this more about greenfield large sub divisions</li> <li>• Consider inclusion of green spaces within private development sites too – i.e. not limiting this policy to public areas.</li> </ul>
<p><b>Policy 2.7:</b> 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.</p>	<p>Supported, with the comment that areas that attract high levels of pedestrian activity need to allow for the movement / mobility needs of the full range of people across the life course.</p>
<p><b>Policy 2.8:</b> Enable quality design solutions in the planning and design code for low-medium density development.</p>	<p>Supported, although this need not be limited to low-medium density development? 2.7 and 2.8 could be combined and apply to all development. This policy could also include specific reference to heritage because many heritage items are low-medium density.</p>

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<b>State Planning Policy 3 – Adaptive Reuse</b>	
	<p>It is acknowledged that this policy is a requirement of the legislation, that adaptive reuse and redevelopment has already occurred in many places in the City of Adelaide, and that this is a State Government focus on enabling more utilisation of existing, unused buildings, in the absence of the market taking the initiative to do so without assistance.</p> <p>Additional research by State Government to more clearly define the problem and clearly define the interventions that are being sought from planning system.</p> <p>Are non-planning system interventions that are proposed by this policy appropriately located in this document?</p>
<p><b>Objective:</b> The adaptive reuse of existing buildings accommodates new and diverse uses.</p>	<p>Could be simplified to “The adaptive reuse of existing buildings”, and consistent terminology could be used throughout (e.g. adaptive reuse instead of repurposing).</p>
<p><b>Policy 3.1</b> 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.</p>	<p>Generally supported, with specific suggestions for improvement and clarification.</p> <p>General comment on Policy 3-1 to 3.7 – duplication/repetition of policy – could be simplified (e.g. 3.1, 3.6. 3.7 are very similar)</p> <p>May need to be a recognition that market cycles exist with respect to building utilisation and that underutilisation can also be of benefit to help preserve significant buildings.</p> <p>Suggest replacing “remove barriers” with “encouraging”.</p> <p>There is opportunity for creative industries, under- resourced communities (CALD, Aboriginal and Torres Strait Islander, gender diverse, young people etc) and temporary uses (pop up, Renew Adelaide etc). This requires consideration of proactive planning for entertainment areas and to enable performance and live</p>

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	music to add cultural vitality through underutilised buildings. This requires consideration of innovative relationships of tenure
<p><b>Policy 3.2</b> Sponsor models of adaptive reuse that allow flexible access to public spaces and infrastructure.</p>	<p>Additional clarity is sought in relation to what “sponsorship” entails and by whom.</p> <p>“Flexible Access” what does this really mean?</p>
<p><b>Policy 3.3</b> Enable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our state’s history.</p>	<p>Include “areas”, include “heritage”.</p> <p>If historical buildings means “heritage buildings” then this needs to be made clear.</p> <p>Is this policy intended to be implemented in conjunction with State Planning Policy 7 – Cultural Heritage?</p>
<p><b>Policy 3.4</b> Prioritise the adaptive reuse of buildings within the City of Adelaide and other mixed-use precincts.</p>	<p>Supported as this is consistent with City of Adelaide’s current position.</p> <p>Providing fit for purpose facilities can be achieved within an accessible, equitable and environmentally sustainable framework.</p>
<p><b>Policy 3.5</b> Facilitate the conversion and adaption of existing commercial office buildings in the City of Adelaide for residential or mixed-use.</p>	<p>This policy is potentially unnecessary as it would be embedded within 3.4.</p> <p>This could be improved by not simply referring to commercial buildings, but maybe also low-grade stock/aged buildings etc.</p> <p>See comments above regarding policy 3.1 and need for policy direction which encourages adaption for creative and entertainment uses which make Adelaide city culturally vibrant and economically successful. These uses generate potential for interface issues and therefore need to be supported in state policy directions.</p> <p>The City of Adelaide’s Strategic Plan encourages city living and aims to grow the population from 23,000 in 2016 to 28,000 by 2020.</p>

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<p><b>Policy 3.6</b> 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.</p>	<p>The thrust of this policy is supported, however City of Adelaide would be wary of unnecessarily dispensing with any prescriptive requirements which, as is generally the case, are in place to address key risk and safety requirements, thereby protecting both investors and the City’s community and businesses from undue exposure to risk.</p> <p>The phrase “Regulatory and financial incentives outside of the planning system” could benefit from further clarification but might not be essential.</p>
<p><b>Policy 3.7</b> Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health and safety.</p>	<p>Is this a duplication of other legislation?</p> <p>Adapting buildings to new uses cannot be done in a way which compromises health, safety and accessibility.</p> <p>Include the words “and equitable access”:</p> <p><b>Policy 3.7</b> Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health and safety <i>and equitable access</i>.</p>
<p><b>State Planning Policy 4 – Biodiversity</b></p>	
<p><b>Objective:</b> Biodiversity is valued and conserved, and its integrity within natural ecosystems protected.</p>	<p>Supported. Aligns with City of Adelaide’s strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023 and Adelaide Park Lands Management Strategy.</p> <p>Aboriginal knowledge is embedded into biodiversity management across activities. First Nations peoples are invited to partner in all aspects of biodiversity management including activities with economic benefit.</p>

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<p><b>Policy 4.1</b> Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat.</p>	<p>Aligns with City of Adelaide’s Integrated Biodiversity Management Plan (IBMP) and Adelaide Parklands Management Strategy.</p>
<p><b>Policy 4.2</b> Minimise the loss of biodiversity, where possible, in accordance with the mitigation hierarchy:</p> <ul style="list-style-type: none"> <li>a) Avoidance – avoid impacts on biodiversity</li> <li>b) Minimisation – reduce the duration, intensity and/or extent of impacts</li> <li>c) Rehabilitation/restoration – improve degraded or removed ecosystems following exposure to impacts.</li> </ul>	<p>Aligns with City of Adelaide’s Integrated Biodiversity Management Plan (IBMP) and City of Adelaide’s Strategic Plan “Green Theme”.</p> <p>Consider removing the term “where possible”.</p> <p>It would also be useful to clarify the connection with the SPP targets and the proposed mechanism for the spatial application and tracking of the effectiveness of this policy.</p>
<p><b>Policy 4.3</b> Recognise that modified landscapes have environmental value and that development should be compatible with these values.</p>	<p>Aligned with Strategic Plan Green Theme and Adelaide Design Manual (Green City Chapters TBA) and Adelaide Parklands Management Strategy.</p>
<p><b>Policy 4.4</b> Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for conserving the natural values of that landscape.</p>	<p>Supported.</p> <p>This policy is aligned with the Integrated Biodiversity management Plan, Strategic Plan, and Adelaide Parklands Management Strategy.</p> <p>Increases opportunities for people’s interactions with ‘natural areas’ in metropolitan Adelaide.</p> <p>Identify opportunities for Aboriginal culture led tourism created and delivered by First Nations peoples to promote and preserve knowledge and practices and for tangible community benefit.</p>

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<b>State Planning Policy 5 – Climate Change</b>	
<p><b>Objective:</b> 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.</p>	<p>Supported. This policy is aligned with:</p> <ul style="list-style-type: none"> <li>• City of Adelaide Climate Change Strategy</li> <li>• Draft Carbon Neutral Council Road Map.</li> <li>• Carbon Neutral Adelaide Action Plan.</li> <li>• Strategic Plan Green Theme.</li> <li>• Resilient East Climate Adaptation Plan.</li> <li>• Integrated Biodiversity Management Plan 2018-2023</li> </ul> <p>Additional comments: Some mechanisms and tools will need to be mandated and include quantitative performance measures if they are to be effective via the planning system. This may need to be contemplated from initial design, through to planning approvals through to National Construction Code and compliance. There is real opportunity for these provisions to drive new investment and skills development in the local industry, generating transferable knowledge and demonstrating industry leadership, whilst stimulating local business.</p> <p>Careful consideration of how this is applied in the Planning and Design Code will be required, and industry leadership will be needed.</p>
<p><b>Policy 5.1</b> Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.</p>	<p>Supported. Also refer to comments relating to this Policy’s Objective, and also in relation to Energy, Key Resources, and Strategic Transport Infrastructure.</p>
<p><b>Policy 5.2</b> Ensure the design of public places increases climate change resilience and future liveability.</p>	<p>Supported. Also refer to comments relating to this Policy’s Objective, and also in relation to Energy, Key Resources, and Strategic Transport Infrastructure.</p>

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<p><b>Policy 5.3</b> Ensure the development of 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.</p>	<p>Supported and is aligned with City of Adelaide strategies and plans, with consideration that more stringent requirements are required to implement this policy, potentially via the BCA and/or the Planning and Design Code.</p> <p>There is a critical point missing here, that ‘climate smart buildings’ need energy and water efficient design and construction <i>of the building itself</i>, as well as good design <i>of the surrounding areas</i> (WSUD, green infrastructure etc). This is particularly important to low income households where high utility bills due to poor design and construction can have a big impact. Add in this policy content such as “<i>through solar access, orientation, insulation, shading and</i>” which address the building design and construction (or similar wording).</p> <p>Also, increasing medium density and high-rise housing (SPP 6) under conditions of climate change requires careful design and good systems to ensure backup energy supply, building design, cooling/shading and emergency access to reduce risk of vulnerability in emergencies. This is particularly so where the high-rise housing is for vulnerable populations such as older people, people with disability, low income etc</p> <p><b>Policy 5.3</b> Ensure the development of climate-smart buildings that reduce our demand for water and energy and mitigate the impacts of rising temperatures <b><i>through solar access, orientation, insulation, shading and</i></b> by encouraging water sensitive urban design, green infrastructure, urban greening and tree canopy enhancement.</p>
<p><b>Policy 5.4</b> Avoid development in hazard-prone areas or, where unavoidable, ensure risks to people and property are mitigated to an acceptable or tolerable level through cost-effective measures.</p>	<p>Supported.</p>
<p><b>Policy 5.5</b> Facilitate green technologies and industries that reduce reliance on carbon-based energy supplies.</p>	<p>Supported.</p>

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<p><b>Policy 5.6</b> Protect areas that provide biodiversity and maximise opportunities for carbon sequestration.</p>	<p>“and which maximise?”</p>
<p><b>Policy 5.7</b> Ensure decision-making considers the impacts of climate change using the best available information on climate risk which is regularly reviewed and updated.</p>	
<p><b>Policy 5.8</b> Support development that does not contribute to increasing our vulnerability or exacerbating the impacts of climate change and which makes the fullest possible contribution to mitigation.</p>	<p>Need to ensure that occurs in practice. Could be improved by “Ensure development does not...”</p>
<p><b>OUR PEOPLE AND NEIGHBOURHOODS</b></p>	
<p><b>State Planning Policy 6 – Housing Supply and Diversity</b></p>	
<p><b>Objective:</b> A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.</p>	<p>Supported, noting that there are often unintended consequences of apparent “easy fix” approaches. The suburban model of subdivision is inappropriate within a City setting.</p>
<p><b>Policy 6.1 –</b> Enable the provision of a well-designed, diverse and affordable housing supply that responds to population growth and targets, and the evolving demographics and lifestyle needs of our current and future communities.</p>	<p>Supported, with the inclusion of the following comments:</p> <ul style="list-style-type: none"> <li>• The Planning and Design code should to think about other models, in addition to the Residential Code, to deal with density, to achieve better outcomes. Options shouldn’t always be to cut up site. Other options that could be contemplated would allow more innovative solutions, such as a small dwelling at back of a site is acceptable.</li> <li>• The Planning and Design Code also needs to look at character and be more flexible.</li> <li>• More communal open space, would address lack of open space on site to create a better neighbourhood.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Past shows, 'easy fix' solutions have been applied but they change the character of neighbourhood and has resulted in really poor outcomes.</li> <li>• The frontage of a site and how this is managed is critical.</li> <li>• There is no recognition of the context/character.</li> <li>• Design outcomes have been really poor to address density in past</li> </ul>
<p><b>Policy 6.2</b> – 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.</p>	<p>It is good to have policy settings that address land supply for housing close to the range of services, facilities, public transport and infrastructure needed by communities. There also needs to be a requirement to address whether the services, facilities and infrastructure have capacity, or will be provided in a timely way to respond to growth and development. This speaks to the Integrated Planning SPP as well as the Principles of Good Planning embedded in the PDI Act. Need for ensure policy settings address the cumulative impacts of development to be considered in the planning for services, facilities and infrastructure that existing and new communities need.</p>
<p><b>Policy 6.3</b> – 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.</p>	<p>Generally support, although it could be reworded for greater clarity. Coordination with SPP 8 which relates to primary industry would be required, to enable retention and effective operation of key agricultural and horticultural lands.</p>
<p><b>Policy 6.4</b> – 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.</p>	<p>Supported.</p>
<p><b>Policy 6.5</b> – Provide a permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.</p>	<p>Can this include innovative housing solutions such as dual occupancy, ancillary dwellings and tiny houses in addition to small lot housing and aged care accommodation?</p>

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<p><b>Policy 6.6</b> – 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.</p>	<p>Supported, with the inclusion of “crisis, transitional and social housing near a range of central social services”.</p> <p>The City of Adelaide’s Strategic Plan encourages city living and aims to grow the population from 23,000 in 2016 to 28,000 by 2020.</p>
<p><b>Policy 6.7</b> – 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).</p>	<p>Supported, however it is recommended that a review of existing policy levers (such as the 15% affordable housing target) is undertaken to understand their effectiveness. A commitment is needed to ensuring any such levers result in the provision of housing for those in need and significantly reduce homelessness.</p> <p>Is there a contradiction between 6.5 and 6.7? Can a planning policy or bonus be applied in a policy environment that is already ‘permissive and enabling’? What is the additional bonus or incentive that would encourage additional affordable housing outcomes?</p>
<p><b>Policy 6.8</b> – 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.</p>	<p>Replace the word “<i>support</i>” with “<i>ensure</i>”. This needs to be a stronger policy direction to facilitate liveability and integrated planning outcomes that the SPP aspire to.</p> <p>Does this policy also include schools, child care, health services? They are not listed in the policy, are not in the definition of community infrastructure on p 66, but do appear in the diagram on p 35.</p> <p>There is an inconsistency in the language and definitions regarding social infrastructure, community infrastructure, community facilities and services in the SPP document that needs to be addressed.</p>

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<p><b>State Planning Policy 7 – Cultural Heritage</b></p>	
<p><b>Objective:</b> Places of cultural heritage significance and heritage areas are conserved for the benefit of our present and future generations.</p>	<p>There is considerable opportunity to revise and strengthen the Cultural Heritage State Planning Policy.</p> <p>Comments below relate to the overall potential of this policy, and also some specific comments in relation to both aboriginal heritage and culture, and non-aboriginal heritage and culture.</p> <p>The language of this objective reflects a static historical lens and not the living cultural lens of contemporary cultural heritage understandings.</p> <p>A living heritage approach would unlock opportunities to work with First Nations peoples to not only conserve but to plan to share, celebrate and enhance places of living cultural heritage.</p> <p>A strategic direction in SPP 7 about fostering cultural vitality in the state would be appropriate.</p> <p>There is policy content missing here about promoting cultural vitality and expression. SPP 7 address <i>conservation</i> of cultural heritage, but viable creative and cultural industries need policy settings that promote the importance of these to city vibrancy and cultural expression. An example of this is the venues that provide live music in areas designated for mixed-use development. These venues can be vulnerable to noise complaints from sensitive land uses that encroach on them over time. Acoustic design in mixed use precincts is critical.</p> <p>There are example of other places in Australia that are doing good planning work for entertainment precincts that SA can learn from eg Brisbane and Canberra:</p> <p><a href="https://www.brisbane.qld.gov.au/planning-building/planning-guidelines-tools/other-plans-projects/valley-special-entertainment-precinct/about-valley-special-entertainment-precinct">https://www.brisbane.qld.gov.au/planning-building/planning-guidelines-tools/other-plans-projects/valley-special-entertainment-precinct/about-valley-special-entertainment-precinct</a></p>

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	<p><a href="https://www.yoursay.act.gov.au/urban-sounds">https://www.yoursay.act.gov.au/urban-sounds</a></p> <p>The built environment and land use planning make important contributions to cultural vitality. In addition to live music/ entertainment venues there is public art, festivals, cultural facilities, public realm design, outdoor dining, liquor licencing, parking provision etc. Also, the affordable creative spaces where creative industries flourish need policy settings to ensure they are promoted and protected in the context of development pressures.</p> <p>This comment could also relate to SPP 9 Employment lands.</p> <p><b>Built Heritage</b></p> <p>It is noted that a Heritage Inquiry is currently being conducted by the Environment, Resources and Development Committee. Outcomes from the inquiry will further inform the State Planning Policies.</p> <p>There is potential to include a State Planning Policy which has a specific focus on built heritage. The proposed terminology around 'places' might address built heritage, but it is currently unclear. This policy must also provide for retention, conservation, and adaptation.</p> <p>Future regional plans and the Planning and Design Code will also need to resolve how to development responds to context and adjacent heritage. It is considered the current SPP insufficiently addresses heritage design.</p> <p>The role of heritage tourism for employment, business development is important to reinforce. The policy needs to recognise that retention of heritage is what make a place unique, gives it a story and an identity and makes us different from everywhere else.</p>

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	The Cultural Heritage SPP currently doesn't recognise protection of cultural landscapes e.g. not as individual heritage places but rather as significant landscapes i.e. the Barossa.
<b>Policy 7.1</b> Support and promote the sensitive and respectful use of our culturally and historically significant places.	Refer to comments on the SPP 7 Objective.
<b>Policy 7.2</b> Recognise and protect Indigenous cultural heritage sites and areas of significance.	<p>Refer and integrate language and intent with current Cultural Heritage legislative requirements.</p> <p>Work with local First Nations Peoples to undertake cultural mapping to understand cultural heritage sites and areas of significance.</p> <p>Also refer to additional comments in relation to the SPP 7 objective.</p>
<b>OUR PRODUCTIVE ECONOMY</b>	
<b>State Planning Policy 8 – Primary Industry</b>	
<b>Objective:</b> A diverse and dynamic primary industry sector making the best use of natural and human assets.	Supported.
<b>Policy 8.1</b> – Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.	Supported, noting that focusing future residential and urban development in City of Adelaide can contribute to reducing pressure on primary production lands.
<b>Policy 8.2</b> – Create local conditions that support new and continuing investment in primary industry while seeking to	Supported.

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<p>promote co-existence with adjoining primary industries and avoid land use conflicts.</p>	
<p><b>Policy 8.3</b> – Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction, and restructuring.</p>	<p>Supported, noting that City of Adelaide has a role in maintaining and increasing attractiveness of the City and South Australia as a place of national and international choice to do businesses and research enhances the ability to retain existing and attract new talent to primary industry sector across the state.</p>
<p><b>Policy 8.4</b> – Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.</p>	<p>Supported, noting that the focus of future residential and urban development and associated land uses in the City of Adelaide can reduce pressure on primary production lands at the edge of urban areas.</p>
<p><b>State Planning Policy 9 – Employment Lands</b></p>	
<p><b>Objective:</b> Employment lands are protected from encroachment by incompatible development and are supported by appropriate transport systems and infrastructure.</p>	<p>Supported – this can relate to City-based employment, office, retail, tourism, arts and culture, entertainment, etc. Residents of the City will also benefit from transport systems which connect them to employment lands in suburbs and regions across the state.</p>
<p><b>Policy 9.1</b> – Enable opportunities for employment that are connected to, and integrated with, housing infrastructure, transport and essential services.</p>	<p>Support, with the inclusion of a strengthening of the need for social infrastructure generally.</p>
<p><b>Policy 9.2</b> – Support state-significant operations and industries and protect them from encroachment by incompatible and/or more sensitive land uses.</p>	<p>Generally support, on the assumption that regional plans and the creation of the Planning and Design Code will enable regional and local input to the designation and/or reinforcement of existing state-significant operations and industries.</p>
<p><b>Policy 9.3</b> – Support and promote adaptable policies that allow employment markets to evolve in response to changing business and community needs.</p>	<p>Supported, noting that this is consistent with the City of Adelaide’s Strategic Plan which seeks to grow the economy via the emerging entrepreneurial culture, creating</p>

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	a national centre for applied research and education, increasing the retail and hospitality sectors, and supporting the development of the clean technology sector.
<p><b>Policy 9.4</b> – Promote new, latent and alternative employment by enabling a diverse range of flexible land use opportunities.</p>	<p>Supported, noting that this policy may apply to the creative industries that are otherwise missing from the SPP. Land use flexibility will also need to consider interface issues and ensure good policy settings that enable creative and emerging industries to find appropriate space and to grow.</p>
<p><b>Policy 9.5</b> – 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 service; and is not constrained by abutting land uses.</p>	<p>Generally supported. This policy reinforces the need to maintain connectivity to City of Adelaide for skilled labour and bypass City for freight.</p>
<p><b>Policy 9.6</b> 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.</p>	<p>This policy requires careful consideration prior to finalising. Maintaining and reinforcing retail in the City of Adelaide is a vital element of this State Planning Policy. Careful consideration of regional plans and Planning and Design Code is required to maintain the primacy of the City of Adelaide as a highly accessible retail hub with a growing residential and a large existing visitor and shopping community.</p>
<p><b>Policy 9.7</b> – Support sustainable tourism where the social, cultural and natural values underpinning the tourism developments are protected to maximise economic growth.</p>	<p>Consider rewording: “by protecting the social, cultural etc....to maximise economic growth”?</p> <p>Embed opportunities for local Aboriginal peoples to develop tourism offerings that enable custodianship and ensure meaningful community outcomes.</p> <p>This policy is consistent with the City of Adelaide Strategic Plan which seeks to boost visitor numbers and help the economy.</p>
<p><b>Policy 9.8</b> – 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</p>	<p>Supported, with the inclusion of “retail” in the first sentence.</p>

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<p>and banking services, speciality health and medical services, higher education, the arts and high-quality speciality retailers that contribute to Adelaide City’s attributes as a destination.</p>	<p>Suggest also include reference to ‘state/national level sport and recreation facilities’. Sport and recreation infrastructure in the City should be ‘destination’ facilities that attract intra and interstate visitation and are well serviced by public transport.</p> <p>Suggest inclusion of reference to educational, cultural tourism and Aboriginal cultural hub for 39 South Australian language groups.</p>
<p><b>Policy 9.9</b> – Encourage the development of vibrant employment and residential mixed-use precincts where conflicts between uses can be managed.</p>	<p>Supported. This policy reinforces the City of Adelaide Strategic Plan in relation to business growth, including by encouraging workers in professional and technical services, education, finance, telecommunications, creative and media sectors.</p>
<p><b>Policy 9.10</b> – 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.</p>	<p>Supported, and could be improved by mentioning circular economy and sustainability outcomes.</p>
<p><b>State Planning Policy 10 – Key Resources</b></p>	
<p><b>Objective:</b> Key resources continue to contribute to our state’s economy and provide valued employment opportunities.</p>	<p>Supported, noting that this policy could be improved by considering how balance and consultation with the needs and opportunities of Aboriginal custodians can be achieved, and also by including reference to post-resource development clean-up.</p>
<p><b>Policy 10.1</b> Define and protect mineral resources operations, associated infrastructure and undeveloped mineral resources from encroachment by incompatible land uses.</p>	<p>Supported, noting that this policy could be improved by considering the need to also define and protect existing land uses from development of mineral resources operations and associated infrastructure.</p>
<p><b>Policy 10.2</b> 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.</p>	<p>To manage governmental risk relating to climate change, it would be worthwhile, and in the long term economic, to actively not develop and/or progressively moth-ball and phase out carbon-based energy supplies.</p>

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<p><b>Policy 10.3</b> – Identify and maintain strategic transport corridors and other key infrastructure required to support resource sector activities and their supply chains.</p>	<p>No comment.</p>
<p><b>OUR INFRASTRUCTURE AND MOVEMENT SYSTEMS</b></p>	
<p><b>State Planning Policy 11 – Strategic Transport Infrastructure</b></p>	
<p><b>Objective:</b> 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 businesses.</p>	<p>Supported.</p> <p>Aligns with City of Adelaide’s strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.</p>
<p><b>Policy 11.1</b> – 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)</p>	<p>Supported. This policy enables multiple modes of transport, including walking, cycling, mobility devices, wheelchairs, buses, taxis, cars, trams, light rail, trains, commercial vehicles, trucks, drones, helicopters, autonomous vehicles (land based and air-borne), aircraft, boats, ships, ferries.</p>
<p><b>Policy 11.2</b> – Promote development that maximises the use of existing and planned investment in transport infrastructure and services.</p>	<p>Supported, noting that there are significant community, health, economic and environmental benefits of providing and encouraging the use of active transport modes such as bus, tram, cycling and walking, over and above private, road-based vehicles. Actively planning investment in transport infrastructure that encourages this is important. This can also extend the effective life of existing road infrastructure, create greater on-road capacity for people who must rely on roads, and be more economic by contributing to preventative rather than reactive health-care and supporting a healthier community. Policy 11.6 encourages such modes, however it is important to embed this approach during early planning in transport infrastructure to maximise cost-efficiencies for development.</p>

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<p><b>Policy 11.3</b> – Enable equitable contribution towards the provision of transport infrastructure and services to support land and property development.</p>	<p>The wording of this policy is ambiguous and should be clarified. Is it promoting <i>‘equity of access to transport infrastructure and services for communities’</i>, or does it require <i>‘equitable contributions to transport infrastructure and services by developers’</i>?</p>
<p><b>Policy 11.4</b> – Support the long-term sustainability and management of transport assets and the various modes that use these assets.</p>	<p>Refer to comment in 11.2 above.</p>
<p><b>Policy 11.5</b> – Minimise negative transport-related impacts on communities and the environment.</p>	<p>Supported. Note that additional regard may be needed during the development of regional plans and Planning and Design Code to the need to consider how to effectively manage visual, sound and safety impacts of emerging air-borne transport options.</p>
<p><b>Policy 11.6</b> – 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.</p>	<p>Refer to comments in 11.2 above.</p> <p>Could strengthen this policy by considering “Enable and encourage beneficial health outcomes for people by enabling and encouraging the increased use of a wider variety of transport modes including active transport options such as walking, cycling, public transport, mobility devices etc.”</p>
<p><b>Policy 11.7</b> – Allow for the future expansion and intensification of strategic transport infrastructure and service provision (corridors and nodes) for passenger and freight movements.</p>	<p>Supported, although could be strengthened by reference to encouraging design and implementation of strategic transport infrastructure and service provision which encourages and/or contributes to reduced greenhouse emissions.</p> <p>Such an approach may present a competitive advantage to South Australian businesses seeking to minimise corporate risk and for future positioning in a future climate-savvy global market, consistent with South Australia’s clean and green image.</p>

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<p><b>Policy 11.8</b> – Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).</p>	<p>Refer to comments in 11.2 and 11.7.</p>
<p><b>Policy 11.9</b> – Enable development that is integrated with and capitalises on existing and future transport functions of transport corridors and nodes.</p>	<p>Refer to comments in 11.2 and 11.7</p>
<p><b>Policy 11.10</b> – Plan development to take advantage of emerging technologies, including electric and alternative fuel vehicles, autonomous vehicles and on-demand transport opportunities.</p>	<p>Need to respond to these emerging technologies, but also ensure that any unintentional negative externalities are managed in advance to ensure quality of life and amenity is maintained, particularly in relation to air-borne emerging technologies.</p>
<p><b>State Planning Policy 12 – Energy</b></p>	
<p><b>Objective:</b> The ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business.</p>	<p>Aligns with City of Adelaide strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.</p> <p>This policy may benefit from also explicitly seeking to achieve greenhouse gas/emission reductions to help mitigate climate change, and to minimise short and long term risks. Other SPPs are seeking to manage the hazards associated with climate change, and it could be at cross-purposes to not reinforce this within SPP 12 - Energy. Reinforcing the need to reduce greenhouse emissions within the energy policy will also assist with overall risk management associated with governmental responses to climate change.</p>
<p><b>Policy 12.1</b> – Support the development of energy assets and their infrastructure which are able to manage their impact on surrounding land uses, and the natural and built environment.</p>	<p>Refer to comment above in relation to also managing short and long-term community, environment and economic risks.</p>

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<p><b>Policy 12.2</b> – Support and promote alternative sources of energy supply at the neighbourhood level.</p>	<p>This policy does not make it clear what alternative means – many previously “alternative” energy sources are now mainstream. If this refers to renewable energy sources, then this is supported.</p>
<p><b>Policy 12.3</b> – Facilitate access to strategic energy infrastructure corridors to support the interconnection between South Australia and the National Electricity Market.</p>	<p>No additional comment.</p>
<p><b>Policy 12.4</b> – 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.</p>	<p>No comment.</p>
<p><b>Policy 12.5</b> – Ensure renewable energy technologies support a stable energy market and continued supply and do not adversely affect the amenity of regional communities.</p>	<p>Supported. The City of Adelaide has a state-wide role as a Capital City and supports ongoing success of all regional communities.</p> <p>This may be out of City of Adelaide’s remit for comment, but might there be a potential gap in this policy in relation to supporting renewable energy technologies in remote communities where this has not already occurred?</p>
<p><b>OUR RESILIENT COMMUNITIES AND ENVIRONMENT</b></p>	
<p><b>State Planning Policy 13 – Coastal Environment</b></p>	
<p><b>Objective:</b> Protect and enhance the coastal environment and ensure that development is not affected by coastal hazards.</p>	<p>Supported.</p> <p>The City of Adelaide encourages, supports and benefits from tourism in South Australia, and a quality coastal environment is a significant tourism attractor.</p> <p>A potential gap exists in the overall policy, which is the mitigation of the cumulative impact of urban development on coastal environments, via unmanaged water quality</p>

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	<p>and quantity impacts from upstream development. Development impacts could be reduced by applying low-cost controls across each catchment at the site, precinct, sub-catchment or catchment scale, utilising existing and emerging tools and technologies.</p> <p>Waste management policy in South Australia can also assist by reducing pollutant loads on the coastal environment. The City of Adelaide has been working towards improved waste management throughout the City. Quality design of new buildings to reduce waste generation and reduce waste to landfill is important in the City of Adelaide.</p> <p>Adaptive reuse of buildings (SPP 3) contributes by minimising waste from demolition, and minimising construction waste. There is also an opportunity for industry leadership to protect our coastal environments via simple on-site construction controls during development which can effectively reduce stormwater pollution.</p>
<p><b>Policy 13.1</b> 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.</p>	<p>Need to be mindful of this from the perspective of River Torrens via City of Adelaide.</p>
<p><b>Policy 13.2</b> Balance social and economic development outcomes in coastal areas with the protection of the environment.</p>	<p>No comment.</p>
<p><b>Policy 13.3</b> 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.</p>	<p>Supported.</p>
<p><b>Policy 13.4</b> Locate development in areas that are not subject to coastal hazards unless the development requires a coastal</p>	<p>No comment.</p>

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location and suitable hazard mitigation strategies are in place, taking into account projected sea level risk and coastal retreat.	
<b>Policy 13.5</b> 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.	This could incorporate a requirement to be designed to adapt over time to respond to risk and/or new information in relation to level of environmental impact.
<b>Policy 13.6</b> Maintain or enhance the scenic amenity of important natural coastal landscapes, view and vistas.	Supported.
<b>Policy 13.7</b> Ensure development maintains and enhances public access to coastal areas with minimal impact on the environment and amenity.	No comment.
<b>Policy 13.8</b> Locate low intensity recreational uses where environmental impacts on the coast will be minimal.	No comment.
<b>State Planning Policy 14 – Water Security and Quality</b>	
<b>Objective:</b> South Australia’s water supply is protected from the adverse impacts of development.	Supported.  Aligns with City of Adelaide strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.
<b>Policy 14.1</b> Provide for the protection and security of the state’s water supply to support a healthy environment, vibrant communities and a strong economy.	Supported.

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<p><b>Policy 14.2</b> Prioritise the protection of water supply catchments including:</p> <ul style="list-style-type: none"> <li>a) The Mount Lofty Ranges Watershed</li> <li>b) Water Protection Areas under the <i>Environment Protection Act 1993</i></li> <li>c) The River Murray Protection Area under the <i>River Murray Act 2003</i></li> <li>d) Prescribed water resources and wells under the <i>Natural Resources Management Act 2004</i>.</li> </ul>	<p>Supported</p>
<p><b>Policy 14.3</b> Provide for infrastructure and land use policy that aims to decrease flood risk and improve water quality and urban amenity.</p>	<p>Supported.</p> <p>The development of the Regional Plans and Planning and Design Code development has opportunity to further reinforce water quality and quantity targets that can be achieved on a development site utilising Water Sensitive Urban Design tools and techniques. This would complement work already being done in the public realm and assist with minimising flood risk in the City of Adelaide.</p>
<p><b>Policy 14.4</b> Ensure our water supply, stormwater and wastewater infrastructure meets the needs of a growing population and economy while balancing environmental outcomes.</p>	<p>Supported, noting that the City of Adelaide Strategic Plan seeks to work with partners to reduce mains water use through water sensitive urban design and increasing the use of recycled and reused water.</p>
<p><b>State Planning Policy 15 – Natural Hazards</b></p>	
<p><b>Objective:</b> Communities and developments are protected from the adverse impacts of natural hazards.</p>	<p>Aligns with existing City of Adelaide strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.</p>

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<p><b>Policy 15.1</b> 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.</p>	<p>No additional comment.</p>
<p><b>Policy 15.2</b> – Design and plan for development in accordance with a risk hierarchy of avoidance, adaptation and protection.</p>	<p>No additional comment.</p>
<p><b>Policy 15.3</b> – 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.</p>	<p>This must be taken into account in regional planning and Planning and Design Code. Adaptation over time may be required (or do some very rigorous long-term planning/learn from existing studies to inform regional planning, taking into account likelihood of climate change exacerbation of natural hazards).</p>
<p><b>Policy 15.4</b> – Mitigate the impact of extreme heat events by designing public spaces and developments to create cooler micro-climates through the use of green infrastructure.</p>	<p>Stronger emphasis on the need to mitigate impact of extreme heat events should also be reflected in SPP2 – Design Quality, so that this is clearly understood and designed for.</p>
<p><b>Policy 15.5</b> – Protect key coastal areas and critical infrastructure at risk from sea level rise, coastal erosion and storm surges.</p>	<p>Appropriate management of stormwater in the City of Adelaide can contribute better management of this natural hazard.</p>

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<b>State Planning Policy 16 – Emissions and Hazardous Activities</b>	
<p><b>Objective:</b> Communities and the environment are protected from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.</p>	<p>This objective assumes that only industrial and infrastructure development can be the cause of emissions and hazardous activities. This policy might be more appropriately worded “enable viable industrial development”.</p> <p>There will need to be close collaboration with the land use definitions, referrals mechanism and yet to be written regulations to appropriately manage emissions and hazardous activities associated with development and spatial planning.</p> <p>Does/should this Policy include greenhouse gas emissions as a risk and hazard from development and land use?</p>
<p><b>Policy 16.1</b> – Ensure our communities and the environment are protected from risks associated with emission and radiation activities while ensuring that industrial and infrastructure development remains viable through:</p> <ul style="list-style-type: none"> <li>a. Ensuring appropriate zoning and mixed uses are compatible</li> <li>b. Avoiding establishing incompatible land use interfaces through encroachment on industrial sites by maintaining adequate separation distances.</li> <li>c. Incorporating engineering controls into building design where emission or impacts are unavoidable.</li> </ul>	<p>If the referral mechanism, e.g. to EPA and other agencies is inadequate then individual assessment might be inadequate.</p> <p>Close liaison across government and with local government and industry will be important during the writing of the Planning and Design Code, as well as during its implementation.</p>
<p><b>Policy 16.2</b> – Ensure risk posed by known or potential contamination of sites is adequately assessed and managed to enable the appropriate development and safe use of land.</p>	