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28 August 2018

State Planning Commission

Via email: [DPTI.PlanningEngagement@sa.gov.au](mailto:DPTI.PlanningEngagement@sa.gov.au)

RECEIVED

28 Aug 2018

SPC

Dear Sir / Madam

### State Planning Commission's Draft State Planning Policies - for Consultation

Council commends the State Planning Commission for the development of the draft State Planning Policies, which is intended to serve as South Australia's overarching planning priorities and act as a framework for other state wide planning tools such the Planning and Design Code.

The City of Charles Sturt has taken the opportunity to consider the Commission's draft State Planning Policies (SPPs) and provides the following comments below and in **Appendix A** for the Commission's consideration.

The Commission's Community Engagement Charter was approved by the Minister for Planning in April 2018. The draft SPPs acknowledges that the process for amending or creating SPPs is set out in the *PDI Act*, which requires public consultation in accordance with the Community Engagement Charter. The draft SPPs should be accompanied with information as to how it was released for consultation in accordance with the Charter to demonstrate how the consultation process has met the principles and performance outcomes of the Charter.

While it is understood what the draft SPPs seek to achieve as the State's over-arching planning strategies, it can be seen as over complicating the planning system given the Government's Planning Strategy (the 30-year Plan for Greater Adelaide (updated 2017) is currently in place. As the draft SPPs are proposed to inform future Regional Plans (currently the Planning Strategy) it would be beneficial for the Regional Plans to be developed prior to the development of the Government's Planning and Design Code.

In relation to the policies released for comment Council provides specific comment on these in the attached document.

Thank you once again for the opportunity to provide feedback on the development of the State's Planning Policies. Council looks forward to the opportunity to review other statutory instruments as they are released for consultation during the implementation of the Planning Reforms.

Please don't hesitate to contact Jim Gronthos on [REDACTED] should you wish to discuss this matter in further detail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Sutton'.

**Paul Sutton**  
Chief Executive Officer

## Appendix A

<b>State Planning Policy 1 – Integrated Planning</b>	
<p><b>Objective</b> <i>Integrated planning is an essential approach for liveability, growth and economic development, maximising the benefits and positive long-term impacts of development and infrastructure investment</i></p>	<ul style="list-style-type: none"> <li>• The draft Objective is considered sound and serves as an over-arching policy.</li> </ul>
<p><b>Policy 1</b> - <i>Plan growth in areas of the state that are connected to, integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions.</i></p>	<ul style="list-style-type: none"> <li>• Some areas of the City are well connected with integrated transport but may not be suited for further growth. An example of this is Council's existing Historic Conservation Areas that were historically developed along the existing railway line and retain a unique character that may be impacted by too much additional growth.</li> <li>• The draft policy indicates allowing growth on proposed transport routes. This could be an issue if development is approved and the proposed transport route does not eventuate. Need to make sure this is only supported on definite outcomes.</li> <li>• The draft policy should reference that planned growth (or infill development) should also achieve environmental benefits.</li> </ul>
<p><b>Policy 2</b> – <i>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 Productions Areas legislation.</i></p>	<ul style="list-style-type: none"> <li>• The draft policy should also consider other food production areas within South Australia that are not included within Greater Adelaide.</li> </ul>
<p><b>Policy 6</b> – <i>Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.</i></p>	<ul style="list-style-type: none"> <li>• To align with Target 5 – 'A Green Liveable City', consider references to include sustainable climate resilient housing development.</li> <li>• The policy also implies that all neighbourhoods require regeneration. This is not the case for all neighbourhoods. The policy should be amended to address this.</li> </ul>
<p><b>Policy 7</b> – <i>Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced car parking to encourage greater use of active transport options such as public transport, walking and cycling.</i></p>	<ul style="list-style-type: none"> <li>• The strategic direction to support the reduction of car parking as a state-wide policy is supported to encourage greater use of alternative modes of transport.</li> <li>• The draft policy should consider including as a transport option the use of electric vehicles and enabling future infrastructure for this method of transport to grow.</li> </ul>

<p><b>Policy 8</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>• Not all areas within metropolitan Adelaide medium rise development given the 30-Year Plan defines medium rise as buildings between three to six storeys in height. The draft policy should be reworded to support medium rise development in strategic locations.</li> </ul>
<p><b>State Planning Policy 2: Design Quality</b></p>	
<p><b>Objective</b> <i>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.</i></p>	<ul style="list-style-type: none"> <li>• The draft Objective provides an important policy guide to achieve good development outcomes.</li> <li>• The alignment to Principles of Good Design is supported.</li> </ul>
<p><b>Policy 3</b> – <i>Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity.</i></p>	<ul style="list-style-type: none"> <li>• To align with Target 5 – ‘A Green Liveable City’ consider the use of the word ‘resource’ before efficient buildings.</li> </ul>
<p><b>Policy 4</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>• To align with Target 5 – ‘A Green Liveable City’ consider the inclusion of ‘sustainable design advice’ as part of this early advice in the planning process.</li> </ul>
<p><b>Policy 6</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>• To align with Target 5 – ‘A Green Liveable City’, consider as a policy the design of development that also provides increased green cover in the private realm and not just in the public realm.</li> </ul>

<p><b>Policy 7 – Prioritise performance based design quality outcomes in Adelaide City; heritage and character areas; places where medium-rise buildings interface with lower-rise development; mixed-use renewal precincts; transit corridors; and iconic locations that attract high levels of pedestrian activity and/or tourism.</b></p>	<ul style="list-style-type: none"> <li>• This draft policy should be considered more broadly than Adelaide City. The areas identified in the draft policy are also reflective of the City of Charles Sturt such as areas of heritage and character and interface areas which are of importance to this council.</li> </ul>
<p><b>Policy 8 – Enable quality design solutions in the planning and design code for low-medium density development.</b></p>	<ul style="list-style-type: none"> <li>• The draft policy should be amended to also seek quality design for high density development as well and all other forms of non-residential development.</li> </ul>
<p><b>State Planning Policy 3: Adaptive Reuse</b></p>	
<p><b>Objective</b> <i>The adaptive reuse of existing buildings accommodates new and diverse uses.</i></p>	<ul style="list-style-type: none"> <li>• This objective is supported from a sustainability position and conservation position for the preservation of the City’s historical built form.</li> </ul>
<p><b>Policy 3 – Enable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our states history.</b></p>	<ul style="list-style-type: none"> <li>• Consideration in the draft policy to include specific references to State and Local Heritage Places and buildings within established Historic Conservation Areas.</li> </ul>
<p><b>State Planning Policy 4: Biodiversity</b></p>	
<p><b>Objective</b> <i>Biodiversity is valued and conserved, and its integrity within natural ecosystems protected.</i></p>	<ul style="list-style-type: none"> <li>• Considered an important over-arching objective.</li> <li>• Additional policies should be considered to reflect: <ul style="list-style-type: none"> <li>• Increasing bio-diversity by creating connecting corridors, to create habitat and encourage the panting of indigenous vegetation.</li> <li>• Consider a policy to recognise the impact that a changing climate may have on areas of biodiversity significance.</li> </ul> </li> </ul>
<p><b>Policy 1. Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat.</b></p>	<ul style="list-style-type: none"> <li>• It is unclear what is meant by protecting impacts of development. The draft policy should refer to endangered native vegetation rather than all native vegetation that may not be so important and can be replaced. The following wording is recommended, “Protect areas with recognised natural values, including areas of endangered native vegetation and critical habitat by minimising the impacts of development.”</li> </ul>

<b>State Planning Policy 5: Climate Change</b>	
<p><b>Objective</b>  <i>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.</i></p>	<ul style="list-style-type: none"> <li>• Consider appropriate incentives for encouraging sustainable housing development.</li> <li>• To align with Target 1 – ‘Containing our Urban Footprint and Protecting Our Resources’, consider policy to address waste management to minimise waste to landfill and reuse and recycle materials in the design, demolition, construction and operation of developments.</li> <li>• Consider policy that addresses building outcomes such as energy ratings through the Building Code and use of contemporary building technologies to reduce the demand on energy and improve liveability within the building i.e. force better glazing, wall cladding and insulation outcomes via building standards</li> </ul>
<p><b>Policy 1</b> – <i>Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.</i></p>	<ul style="list-style-type: none"> <li>• Evidence that a ‘compact urban form’ is also ‘carbon efficient’ is unsupported. The draft policy should consider integrated urban design and planning to encourage climate resiliency.</li> <li>• The following wording is recommended, “Create a climate change resilient living environment through a more compact urban form that supports cycling and walking, the use of public transport and reduces dependence on private vehicles.”</li> </ul>
<p><b>Policy 2</b> – <i>Ensure the design of public places increases climate change resilience and future liveability.</i></p>	<ul style="list-style-type: none"> <li>• The draft policy should be broadened to include the design of the private realm.</li> </ul>
<p><b>Policy 3</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>• The draft policy is a bit confusing attempting to address too many issues.</li> <li>• To align with Target 5 – ‘A Green Liveable City’, consider a stand-alone policy to address the provision of green canopies in future development.</li> <li>• The use of the language ‘climate-smart’ is considered jargon and could be reworded to read, “Ensure the development of buildings that are resilient to future climate change projections which reduce our demand for water and energy, increase local renewable energy generation and .....</li> </ul>
<p><b>Policy 4</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>• Consider the use of the word ‘Discourage’ rather than the word ‘Avoid’.</li> </ul>

<p><b>Policy 5</b> – <i>Facilitate green technologies and industries that reduce reliance on carbon-based energy supplies.</i></p>	<ul style="list-style-type: none"> <li>Consider the use of the word 'Encourage' rather than the word 'Facilitate'.</li> </ul>
<p><b>Policy 7</b> – <i>Ensure decision-making considers the impacts of climate change using the best available information on climate risk which is regularly reviewed and updated.</i></p>	<ul style="list-style-type: none"> <li>Consider the use of the words 'climate change science and...' to replace the words 'information on'.</li> </ul>
<p><b>Policy 8</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>The following wording is recommended, "Encourage development that reduces vulnerability and exposure to the impacts of climate change and which makes the fullest possible contribution to mitigation."</li> </ul>
<p><b>State Planning Policy 6: Housing Supply and Diversity</b></p>	
<p><b>Objective</b> <i>A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.</i></p>	<ul style="list-style-type: none"> <li>Consider through policy an increase in housing design that is consistent with Liveable Housing Design elements to support all life stages and ageing in place.</li> </ul>
<p><b>Policy 1</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>Consider the inclusion of 'climate change' in the draft policy as a response to future housing design.</li> </ul>
<p><b>Policy 3</b> - <i>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.</i></p>	<ul style="list-style-type: none"> <li>What if there is a demonstrated need to establish a new town/ city that is not contiguous with an existing development area? How do the policies support this? This policy only talks about established areas or contiguous with these. Note that draft SPP 1 Integrated Planning Policy 3 talks about land supply for housing and employment growth.</li> </ul>
<p><b>Policy 7</b> - <i>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).</i></p>	<ul style="list-style-type: none"> <li>The notion of incentives or concessions is not supported. In infill areas development is usually on small lots and with small footprint dwellings that have little if any open space for most of the affordable redevelopment.</li> </ul>

<b>State Planning Policy 7: Cultural Heritage</b>	
<p><b>Objective</b> <i>Places of cultural heritage significance and heritage areas are conserved for the benefit of our present and future generations.</i></p>	<ul style="list-style-type: none"> <li>• The draft objective should be broadened to reference areas of historical significance. The City of Charles Sturt as with many inner city councils has a number of Historic Conservation Areas which have a historical basis and add to the cultural value of the Council area.</li> </ul>
<p><b>Policy 1</b> – <i>Support and promote the sensitive and respectful use of our culturally and historically significant places.</i></p>	<ul style="list-style-type: none"> <li>• The draft policy should be broadened to reference built heritage.</li> </ul>
<b>State Planning Policy 9: Employment Lands</b>	
<p><b>Objective</b> Employment lands are protected from encroachment by incompatible development and are supported by appropriate transport systems and infrastructure.</p>	<ul style="list-style-type: none"> <li>• The draft Objective should be broader and capture the importance of employment lands in supporting a vibrant and economically prosperous community.</li> <li>• Employment lands need to be provided in strategic locations to reduce the need for people to travel to work and access services. The following wording is recommended, “An adequate supply of employment land should be provided in strategic locations supported by appropriate transport systems and infrastructure and protected from encroachment by incompatible development.”</li> </ul>
<p><b>Policy 5</b> – <i>Protect prime industrial land for employment use where it provides connectivity to freight networks; enables a critical mass or cluster of activity; has the potential for expansion; is connected to skilled labour; is well serviced; and is not constrained by abutting land uses.</i></p>	<ul style="list-style-type: none"> <li>• The protection of prime industrial land (PIL) should not be contingent or weighted heavily on the ‘potential for expansion’. There are a number of PIL sites in metro Adelaide that do not have the potential for expansion yet play a vital role in supporting the local economy and need to be protected.</li> </ul>
<p><b>Policy 6</b> – <i>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.</i></p>	<ul style="list-style-type: none"> <li>• Further detail is needed in the draft policy to ensure that land for retail/commercial uses is provided in clusters and areas that are accessible by sustainable transport. These uses should be focussed along or within walking distance to mass transit routes Retail uses beyond strategic transport routes that can be serviced with public and sustainable transport options and avoid the promotion of car use.</li> </ul>

<b>State Planning Policy 11: Strategic Transport Infrastructure</b>	
<p><b>Objective</b>  <i>Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and business.</i></p>	<ul style="list-style-type: none"> <li>• Consideration should be given to address State strategic transport infrastructure that is vulnerable to climate change impacts or that these need to be monitored in order to maintain the operational capacity / economic viability of the State.</li> <li>• A large amount of this infrastructure is within the AdaptWest region and is considered by the AdaptWest Plan (<a href="https://www.environment.sa.gov.au/topics/climate-change/programs-and-initiatives/adapting-to-climate-change/regional-adaptation-plans">https://www.environment.sa.gov.au/topics/climate-change/programs-and-initiatives/adapting-to-climate-change/regional-adaptation-plans</a>) eg: Adelaide Airport, Inner and Outer Harbor and the road freight network that services these activity centres.</li> </ul>
<p><b>Policy 2 - Promote development that maximises the use of existing and planned investment in transport infrastructure and services.</b></p>	<ul style="list-style-type: none"> <li>• It is difficult to approve development that makes use of infrastructure that is not already there. Consider removing references to 'planned' infrastructure.</li> </ul>
<b>State Planning Policy 12: Energy</b>	
<p><b>Objective</b>  <i>The ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business</i></p>	<ul style="list-style-type: none"> <li>• Consideration of policy to encourage emerging technologies (such as battery storage) to be integrated / considered at design and planning of new developments.</li> <li>• Consideration of policy to address energy efficiency and carbon emissions reduction as a priority above all other forms of energy generation.</li> <li>• Consider emerging technologies that include provision for local micro grids and energy exchange platforms in order to reduce vulnerability to climate change impacts.</li> </ul>
<b>State Planning Policy 13: Coastal Environment</b>	
<p><b>Policy 1 - Ensure development is not at risk from current and future coastal hazards (including coastal flooding, erosion, inundation, dune drift and acid sulphate soils) consistent with the hierarchy of avoid, accommodate and adapt.</b></p>	<ul style="list-style-type: none"> <li>• Consideration should be made where the city is already at risk to ensure infrastructure outcomes are in place to protect the existing built form from these effects rather than require a stand-alone development to address risk. As an example one development may be required to be sited higher on a site to address sea level rise than the existing properties surrounding the site.</li> <li>• It is noted that Policy 15 Natural Hazards addresses this.</li> </ul>

<b>State Planning Policy 14: Water Security and Quality</b>	
<b>Policy 3</b> – <i>Provide for infrastructure and land use policy that aims to decrease flood risk and improve water quality and urban amenity.</i>	<ul style="list-style-type: none"> <li>Consider including alternative water sources to reduce reliance on potable water. The following wording is recommended, <i>“Provide for infrastructure and land use policy that aims to decrease flood risk <b>and potable water use and increase the use of alternative water sources and improve water quality and urban amenity.</b>”</i></li> </ul>
<b>State Planning Policy 15: Natural Hazards</b>	
<b>Policy 4</b> – <i>Mitigate the impact of extreme heat events by designing public spaces and developments to create cooler micro-climates through the use of green infrastructure.</i>	<ul style="list-style-type: none"> <li>Consider including blue infrastructure, passive design and building materials to help create more liveable areas, reduce the need for artificial heating and cooling and reduce overheating during power outages. The following wording is recommended, <i>“Mitigate the impacts of extreme heat by designing public spaces and developments to create cooler micro-climates through the use of green and <b>blue infrastructure and through passive design and selection of materials.</b>”</i></li> </ul>