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**From:** Paul Mickan >  
**Sent:** Friday, 7 September 2018 10:54 AM  
**To:** DPTI:Planning Engagement  
**Subject:** Draft State Planning Policies - Submission from The Barossa Council

The Barossa Council provides the following comments on the draft State Planning Policies:

#### **Targets**

- The purpose of the targets is not clear. Are they included to primarily measure performance or for other reasons?
- The document refers to "six targets", yet there are nine separate targets set out under six headings, none of which appear to relate directly to the 16 SPPs
- Not all SPPs will be able to have quantifiable targets - e.g. design quality
- The document includes targets from the 30YP 2017 Update with an indication that strategic targets for the whole of the state to follow. This implies that when targets are inserted into other existing or future regional plans they will be included in the SPP document
- Repetition of targets that appear in regional plans is at odds with one of the planning reform concepts of simplicity and avoiding duplication
- What is the 'primacy' of targets in the SPPs as opposed to targets in regional plans - i.e. do the SPPs set the targets or regional plans? The document adopts both approaches in that it contains all the targets from the 30YP 2017 Update (with a minor omission - see below) whereby the regional plan informs the SPP, but it also includes two new/additional targets for South Australia whereby the SPP document directs the regional plans
- Based on the premise that targets will initially be set at the regional level, it follows that the SPP document will require amendment to include the relevant new or amended targets. This seems to be adding unnecessary complication to the system
- If targets are retained, Target 1.2 (from the 30YP 2017 Update) is missing "by 2045" at the end
- Regardless, if any targets are included they would be better placed at the end of the document after the policies as is the case with the 30YP 2017 Update

#### **SPP1: Integrated Planning**

- The draft policies don't refer to character preservation districts (CPDs) (on the basis that they will be subject to a separate SPP) but several policies appear in conflict with the intent of CPDs or will create confusion - e.g. policies 2 and 3 only refer to EFPA's giving the impression that CPDs are not subject to those policies. In other words under #3 it could be interpreted that land within a CPD, given that it is outside the EFPA, could be identified for housing and employment land. We know that is not the intent, but the point is that by not referring to CPDs (with them being in a separate document) it results in a disjointed policy framework.
- #2 - there is no EFPA 'legislation' as relevant provisions are contained within the PDI Act itself
- #3 - reference to 'forecast period' and 10 years seems a point in time which 'dates' the SPP document - what if it is extended to 15 years or shortened?
- #5 - doesn't read well - i.e. "Plan for urban growth to protect..." Possible alternative wording is "Ensure urban growth does not..." or simply "Protect and preserve..."

#### **SPP2: Design Quality**

- Several policies appear to relate directly to development assessment, or would be difficult to measure outcomes or their effectiveness - e.g. #4 about timing of design advice

#### **SPP6: Housing Supply and Diversity**

- #3 - should reference EFPA's to avoid doubt that housing growth within EFPA's outside towns is not supported

#### **SPP7: Cultural Heritage**

- There seems to be very few policies for such an important subject
- Suggest cross-reference to SPP3 Adaptive Reuse, in particular flexibility for the re-use of existing buildings

**SPP9: Employment Lands**

- The objective should be expanded to protect loss of employment lands in addition to encroachment - i.e. conversion of existing employment land to other uses which reduces employment opportunities

**SPP14: Water Security and Quality**

- Should this include Water Allocation Plans and the use of water in addition to the quality of water?

**General comments**

- Inadequate attention has been given to protecting key infrastructure such as gas pipelines from encroachment and minimising risks - e.g. avoiding residential development adjacent to a high pressure gas pipeline which might compromise its operation but also subject occupants to avoidable risk.

**Special Legislative schemes**

- It is understood that a SPP with respect to special legislative schemes has not been included in the document as the preparation and amendment of such SPPs follows a different pathway to the legislated and Ministerial SPPs. Despite this, it will be potentially confusing the public and practitioners alike to have to search two separate documents for SPPs relevant to them
- Consideration should be given to a way to present all SPPs within the one document albeit different initiation and amendment pathways may be followed. Users are more likely to be more concerned about the content of the SPP and the ease of finding them, than the process followed to introduce and amend them

Please contact me on [redacted] or [redacted] for more information or clarification.

Regards,

**Paul Mickan**  
Principal Planner

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T: [redacted]

The poster features a teal background with the text: *- make a difference -*, **COUNCIL ELECTIONS**, and *- 2018 -*. On the right, there is a circular icon of a megaphone and the word **NOMINATE** in large white letters. Below this, it says "must be received by 12noon Tuesday 18 September 2018". A partial image of a smiling man's face is visible on the far right. At the bottom, there is a horizontal bar with the text: premium wine food tourism heritage lifestyle commur. Below this bar are several small images: a green tree logo for The Barossa Council, a vineyard, a stone path, a person on a bicycle, and a plate of food.

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