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21 September 2018

State Planning Commission
c/o Department of Planning, Transport and Infrastructure
GPO Box 1815
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RE: RESPONSE TO DRAFT STATE PLANNING POLICIES

Thank you for the opportunity to respond to the Draft State Planning Policies currently on consultation. The below comments have been jointly prepared by Planning Officers of the Copper Coast Council, Yorke Peninsula Council and Barunga West Council. These three Councils are working towards a Joint Planning Board and exhibit common planning themes. I note that these comments have not been endorsed by the respective Councils and accordingly do not necessarily reflect the comments of the respective Councils.

An overarching theme through the draft policies is their metro-centric basis of the policies. The priorities for regional areas differ greatly from Metropolitan Adelaide and in a number of instances require their own set of planning policies. Whilst the policies are overarching motherhood statements, they can have substantial implications in the development of our Regional Plans and Code Amendments, more-so now that such amendments can be made by external parties.

Part 4 – Our Targets

1.3 - 85% of all new housing in regional South Australia will be built within townships and defined settlements

Acknowledging the importance of infill development and the benefits that such infill provides, growing regional areas exhibit a much different demand to that of metropolitan Adelaide. Whilst a demand exists for infill housing, as our population continues to grow an equal demand exists for land within new estates. The lack of infrastructure within some regional townships further reduces an ability to provide infill residential development. Onsite waste disposal for instance restricts an ability to subdivide.

Residents are seeking larger allotments within regional areas and can achieve this within the bounds of 'affordable housing'. A detached dwelling with land and a large shed is common place within a regional setting. This in instances is a driver for living within regional areas and not metropolitan Adelaide.

lifestyle location of choice

It is considered that a numerical target is not required in regional South Australia. Such targets could have significant implications for future code amendments undertaken by Council and the continued growth of our region. Rather, let the market dictate housing choice. Allow for appropriately located infill development and contiguous growth. Regional townships differ significantly in growth and demand.

Whilst Policy 3 of SPP 6 talks to allowing for contiguous growth of regional centres, we seek to ensure that such growth abilities are not compromised due to a need to achieve the 85% target.

6.2 Housing choice in regional cities and towns will increase by 10% to meet changing household needs in regional South Australia by 2045

This somewhat contradicts 1.3 above. If 85% of new housing is proposed to be by infill, in a regional setting such infill is for the purposes of changing household needs and differs from a standard detached dwelling housing choice. If this target is seeking to promote a greater density again, such as Residential Flat buildings, it is considered important that such densities are appropriately located.

Perhaps an alternative target would be:

'The facilitation of appropriately located housing choice within regional cities and towns to meet changing household needs.'

SPP 1 – Integrated Planning

Regional centres do not fit within the hierarchy outlined.

Policy 7: Whilst we don't disagree with the intent of this policy as it relates to Metropolitan Adelaide, within regional centres promotion of mixed use developments outside of centres can have negative implications to the centre itself. We are seeking to focus commercial/retail/mixed use development within centres, not surrounding them. Council's are focusing resources into promoting centres and reducing existing vacancies.

Regional areas do not have public transport nodes or strategic transit corridors to justify reduced car parking rates outside of centres. We do however support greater housing densities and aged housing within close proximity to town centres.

SPP 6 – Housing Supply & Diversity

Policy 7: Further background is required as to what planning policy bonuses or concessions are proposed. It is important that poor planning outcomes do not result. Within a number of regional areas, the median house price falls within the parameters of affordable housing.

SPP 8 – Primary Industry

Our region has a strong agricultural background which provides a strong economy for the state and our communities. It is agreed that the co-existence of uses in instances is appropriate

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however there should be a necessity for such a use to be within such areas. The affordability of such land (in comparison to appropriately zoned land) continually results in a demand for unacceptable encroachment. The terms 'diverse and dynamic primary industry sector', whilst understanding the intent could result in an open door to inappropriate development.

The importance of this sector of the SPP's for regional areas calls for further depth to be considered. An additional policy relating to the importance of protecting valuable primary production land should be considered.

We are experiencing continued pressure for solar farms which seek to cover valuable farming land for purposes that do not directly service the local community. Understanding the necessity of such renewable facilities, it is important that such facilities are appropriately located on unproductive farming land. How this relates to the SPP's is ensuring that it is not just key assets that are protected. Productive farm land generally should be protected from inappropriate land uses as once it is gone or divided, it is difficult to get back.

Policy 4 refers to the equitable management of interface between primary production and other land uses. The term 'equitable' leans to giving the further land use an equal land use right and the primary production user an equal responsibility to management. It is considered that farmers should be given the right to farm and that any other use should ensure that this right is not restricted.

At the edge of an urban area, the urban developer should be implementing appropriate buffers and management techniques to ensure that urban development does not inhibit the primary production use.

SPP 9 – Employment Lands

Policies 4, 6 and 9, whilst appropriate to Metropolitan Adelaide these policies again do not align with the desired outcomes of regional areas. The importance of retaining the regional centre is pivotal to regional communities. Retail and commercial development is to be focused within such centres. This is the primary reason that SAPPL Employment Lands Zoning was not extended to regional areas. Flexibility in commercial zone policy outside of regional town centres will result in the creation of secondary centres, and poor planning/economic outcomes. The open nature of the term 'employment lands' in itself is not suited to a regional setting.

Councils are investing significant resources into existing centres to promote the uptake of existing vacancies. Unlike Adelaide, regional centres do not have the population to justify secondary centres and the spread of commercial/retail development. A secondary centre in a regional setting should be the town centre of the next township.

Across the State and Australia, there are examples of regional centres and main streets that are collapsing due to secondary centres being created outside of the extent of the existing centre. A lack of available land does not result in the need for an outer centre, but rather a greater strategic approach and further investment by the developer.

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The proposed flexibility of such zoning/policy will result in hesitancy for code amendment support from Council in instances where support may otherwise be warranted. For example, a developer may seek to rezone land for bulky goods outlets, however as such zoning could also result in a secondary retail centre, Council would likely object.

An additional policy is required such as:

'Retain regional town centres as the foci of retail and commercial activities in accordance with role and function of the town.'

Policies 4 and 6 in particular should be restricted to Greater Metropolitan Adelaide (within the policy itself) to avoid any conflict with the additional policy proposed above and concerns outlined.

It is further considered important to retain the Bulk Handling Zones currently containing large grain storage/handling industries, where located within or adjoining Townships. This zone policy appropriately allows for the growth of such uses. An alternative flexible industrial type zoning approach could however have serious planning interface implications.

Thank you again for the opportunity to provide input. Please contact Matt Dineen on [REDACTED] should you wish to discuss any of these matters in further detail.

Yours faithfully



Matt Dineen

CO-ORDINATOR STRATEGIC PLANNING & DEVELOPMENT

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