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16 August 2018

Sarah Elding
Project Lead State Planning Policies
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

BY EMAIL: DPTI.PlanningEngagement@sa.gov.au

Dear Ms ~~Elding~~ Sarah,

Draft State Planning Policies – City of Holdfast Bay Comments

Thank you for the opportunity to provide comments in response to the Draft State Planning Policies.

Council considered the Draft State Planning Policies at its Meeting held on 14 August 2018. Please find attached Council's comments, which focus on a selection of policies in the context of Holdfast Bay's own strategic vision, providing feedback and identifying some opportunities to strengthen the content where necessary.

Please contact Anthony Marroncelli, Manager Development Services, on 8229 9904 should you wish to discuss Council's comments further.

Yours faithfully


Justin Lynch
Chief Executive Officer
encl.



Proposed Policy	Resonance with Holdfast Bay Strategic Plan <i>Our Place 2030</i>	Support  Support as written  Limited support  Request change	Commentary/Recommended Change
PLANNING POLICY 1: INTEGRATED PLANNING			
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.	Community: <i>Providing welcoming, Accessible Facilities.</i> Economy: <i>Supporting and Growing Local Business</i> Placemaking: <i>Developing Walkable, Connected Neighbourhoods</i>	✓	This Policy recognises the importance of protecting council's industrial and retail precincts from incompatible uses, and it is recommended that this is carried-through to the development of robust interface requirements in the more refined Regional Plans and Design Code documents.
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.	Economy: <i>Supporting and Growing Local Business</i> Placemaking: <i>Housing a Diverse Population</i>	✓	The Policy is broad, so it will be the degree of anticipated growth that will drive the demand for land, and the relative targets that are assigned to specific areas. The forecast period of 10 years is supported as it is sufficiently reliable to make informed decisions.
Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.	Community: <i>Providing welcoming, Accessible Facilities.</i> Placemaking: <i>Housing a Diverse Population</i> Placemaking: <i>Creating Lively and Safe Places</i>	?	It is recommended that boundaries are established around the opportunities for renewal and regeneration, as properties with character should not be deemed dispensable based on a subjective assessment as to their condition. Renewal and regeneration should also be contingent on Good Design, requiring engagement with the State Government Architect for significant proposals. It is also recommended that there needs to be some acknowledgement that the cost of service provision

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					needs to be shared by developers. It is anticipated that Infrastructure Agreements will play a part in apportioning costs fairly, although details are yet to be developed.
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.	Community: <i>Providing welcoming, Accessible Facilities.</i> Placemaking: <i>Housing a Diverse Population</i> Placemaking: <i>Creating Lively and Safe Places</i> Placemaking: <i>Developing Walkable, Connected Neighbourhoods</i>		?		The assumption that higher density living adjacent activity centres, public transport nodes and strategic transit corridors can justify reduced car parking demand, needs to be considered in the context of a neighbourhood's capacity to absorb increased traffic and parking. Typically, such areas are already congested through park and ride users and staff from local businesses. It is therefore recommended that this Policy is linked to the findings of the Planning Minister's Car Parking Summit and by area specific data provided by local councils.
STATE PLANNING POLICY 2: DESIGN QUALITY					
Ensure plans encourage development that incorporates the Principles of Good Design.	Placemaking: <i>Housing a Diverse Population</i> Placemaking: <i>Creating Lively and Safe Places</i> Placemaking: <i>Developing Walkable, Connected Neighbourhoods</i>		?		The application of this Policy is the key to its success, as subjectivity can erode Good Design. It is therefore recommended that the more refined guidelines contained in future Regional Plans and Design Codes are linked to principles of Good Design as a means to uphold the intent of this Policy.
Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design,	Community: <i>Providing welcoming, Accessible Facilities.</i> Community: <i>Building a Healthy, active and Resilient Community.</i>		?		This Policy has significant merit, although there is a conflict with other Policies that promote alternative solutions and concessions from accepted standards as a means to 'unlock' investment. It is either "best

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Access for All, Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design.	Placemaking: <i>Creating Lively and Safe Places</i>		practice” or it is not. It is therefore recommended that the Policy be less ambiguous and only allow for alternative solutions in the absence of a best practice model. From the perspective of Holdfast Bay, it is recommended that Water Sensitive Urban Design is separated into its own Policy, given the number of issues that require attention for a downstream location (onsite water retention, permeability of site, stormwater reuse, aquifer quality, flood mitigation etc).
Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity.	Community: <i>Providing welcoming, Accessible Facilities.</i> Community: <i>Building a Healthy, active and Resilient Community</i> Placemaking: <i>Housing a Diverse Population</i>	?	This is an important, albeit ambitious, Policy which addresses the challenge of addressing social disadvantage through planning policy, which requires careful attention to the substance of the sub-policies. It is therefore recommended that for this Policy to be successful, complementary guidelines around Good Design, energy efficiency, accessibility, and safe neighbourhoods must be applied in equal measure.
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.	Community: <i>Providing welcoming, Accessible Facilities.</i> Community: <i>Building a Healthy, active and Resilient Community.</i> Placemaking: <i>Creating Lively and Safe Places</i> Environment: <i>Fostering an Environmentally Connected Community</i>	?	A necessary Policy, particularly for areas such as Holdfast Bay, which will hopefully lead to a greater share of Open Space funding, as our open space and streetscape strategies are developed. However, there is insufficient focus on open space, recreation and social infrastructure to reconcile the need to provide adequate service levels with an agenda that promotes an increase to population density. It is therefore recommended that areas suitability to cater for higher density is linked to service capacity, or commensurate with planned

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			services. It is also recommended that separate and specific policies are developed for the beach, which forms part of the Metropolitan Open Space System.
Enable quality design solutions in the planning and design code for low-medium density development.	Placemaking: <i>Creating Lively and Safe Places</i>	?	It is unclear why the Policy identifies low-medium density for mention, as quality design solutions are required for all types of development. It is therefore recommended that the Policy be reworded to capture all forms of development.
STATE PLANNING POLICY 3: ADAPTIVE REUSE			
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.	Community: <i>Providing welcoming, Accessible Facilities.</i> Placemaking: <i>Housing a Diverse Population</i> Placemaking: <i>Building Character and Celebrating History</i> Economy: <i>Making it Easier to Business</i>	?	Whilst it is important that the Policy is not too limiting to the point where it discourages the renewal of historic buildings, there need to be some boundaries set around the adaptive reuse of such buildings. Properties with character should not be deemed dispensable based on a subjective assessment as to their condition or indeed their degree of use, with consideration also given to broader land use and urban design objectives. It is therefore recommended that the Policy is qualified by a reference to local character identified by Regional Plans, which will inform the more specific architecture and streetscape guidelines contained in the Design Code.
Enable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our state's history.	Community: <i>Providing welcoming, Accessible Facilities.</i> Placemaking: <i>Housing a Diverse Population</i>	?	It is recommended that there need to be some parameters around the repurposing of buildings in this Policy, as properties with character should not be granted unlimited dispensation to the point

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	Placemaking: <i>Building Character and Celebrating History</i> Economy: <i>Making it Easier to Business</i>		where their character is compromised. This is paramount as we enter an increasingly deregulated assessment regime where private contractors are at liberty to make subjective decisions on important buildings.
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.	Economy: <i>Making it Easier to Business</i>	✗	An incentives based planning system that grants dispensation, or worse 'credits', in return for concessions elsewhere cannot coexist with a planning system that promotes certainty through policy. Without knowing the extent and nature of the concessions and incentives, there can be limited support for such a policy.
STATE PLANNING POLICY 4: BIODIVERSITY			
Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat.	Environment: <i>Protecting Biodiversity</i> Environment: <i>Building an Environmentally Resilient City</i>	?	This is a worthwhile Policy, although it is unclear why the word "minimise" would feature in a statement where the subject matter is native vegetation and <u>critical</u> habitat. Consideration also needs to be given to views/vistas, natural beauty and biodiversity for this to be a well-rounded Policy. It is therefore recommended that this Policy should be unambiguous and prescribe that <u>no</u> impact should occur on such areas, minimal or otherwise, and that scenic value is included in equal measure.
STATE PLANNING POLICY 5: CLIMATE CHANGE			

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Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.	<p>Community: <i>Building a Healthy, active and Resilient Community.</i></p> <p>Environment: <i>Protecting Biodiversity</i></p> <p>Environment: <i>Building an Environmentally Resilient City</i></p> <p>Placemaking: <i>Creating Lively and Safe Places</i></p>			?	The assumption that a compact urban form will deliver carbon-efficient living needs to be challenged, as building design, more so than density, is the key co-driver for creating a sustainable urban form. It is dangerous to use density <i>per se</i> as any justification for achieving environmental sustainability, although the walkability benefits are acknowledged. It is therefore recommended that the Policy is reworded to be less presumptive on the benefits of higher density living.
STATE PLANNING POLICY 6: HOUSING SUPPLY AND DIVERSITY					
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>Community: <i>Providing welcoming, Accessible Facilities.</i></p> <p>Placemaking: <i>Housing a Diverse Population</i></p> <p>Placemaking: <i>Creating Lively and Safe Places</i></p>		✓		The population forecast period of 10 years (promoted in previous Policy) is sufficiently reliable to make informed decisions on density.
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>Community: <i>Providing welcoming, Accessible Facilities.</i></p> <p>Placemaking: <i>Housing a Diverse Population</i></p> <p>Placemaking: <i>Creating Lively and Safe Places</i></p>			?	There are certainly reciprocal benefits in co-locating residential and commercial activities, in an accessible location. However, the assumption that vibrancy can simply occur through spatial policies, diminishes the value that 'Good Design' can play in creating sustainable communities and neighbourhoods. It is therefore recommended that this Policy is qualified by Good Design.
STATE PLANNING POLICY 7: CULTURAL HERITAGE					

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Support and promote the sensitive and respectful use of our culturally and historically significant places.	Community: <i>Celebrating Culture and Diversity</i> Placemaking: <i>Building Character and Celebrating History</i>		?		It is pleasing to note that this is an unambiguous and unconditional policy. However, it is unclear how (or whether) this Policy takes precedence over other Policies that promote development. It is therefore recommended that consideration is given to a policy hierarchy to ensure that important policies are not lost in an 'on-balance' assessment.
STATE PLANNING POLICY 8: PRIMARY INDUSTRY					
STATE PLANNING POLICY 9: EMPLOYMENT LANDS					
Encourage the development of vibrant employment and residential mixed-use precincts where conflicts between uses can be managed.	Community: <i>Providing welcoming, Accessible Facilities.</i> Economy: Supporting and Growing Local Business Placemaking: <i>Housing a Diverse Population</i> Placemaking: <i>Creating Lively and Safe Places</i>		✓		This is a well-balanced policy, because it is conditional on managing the interface when considering mixed-use development.
STATE PLANNING POLICY 10: KEY RESOURCES					
STATE PLANNING POLICY 11: STRATEGIC TRANSPORT INFRASTRUCTURE					
Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).	Community: <i>Providing welcoming, Accessible Facilities.</i> Placemaking: <i>Creating Lively and Safe Places</i>		✓		With tram, train and major arterial road infrastructure within our city, this is a critical policy that should provide a catalyst for greater attention, and potential funding, towards our corridors. This

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			may create opportunities for improved parking, and park and ride facilities.
STATE PLANNING POLICY 12: ENERGY			
Support and promote alternative sources of energy supply at the neighbourhood level.	Environment: <i>Building and Environmentally Resilient City</i> Environment: <i>Using Resources Efficiently</i> Environment: <i>Fostering an Environmentally Connected Community</i> Economy: <i>Harness Emerging Technology</i>	?	This is an important policy that provides 'permission' to explore alternative sources of energy for development enclaves. However, with minimal detail, the policy needs to ensure that the impacts of the plant and equipment required to harness and deliver energy (noise, visual, reliability, cost) are well considered before proceeding too far.
STATE PLANNING POLICY 13: COASTAL ENVIRONMENT			
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.	Environment: <i>Building and Environmentally Resilient City</i> Environment: <i>Using Resources Efficiently</i> Environment: <i>Fostering an Environmentally Connected Community</i> Economy: <i>Harness Emerging Technology</i>	✓	Several important coastal sites (Glenelg Jetty, Caravan Park, Coast Park, Minda Dunes) will benefit from policies that enable sensitive redevelopment. It will be interesting to know the future role of the Coast Protection Board (CPB) in the assessment of development applications, but needless to say, this Policy will only work if the CPB remains a key stakeholder.
Ensure development maintains and enhances public access to coastal areas with minimal impact on the environment and amenity.	Community: <i>Providing welcoming, Accessible Facilities.</i> Environment: <i>Fostering an Environmentally Connected Community</i>	✓	Although Coast Park is nearing completion, there may be other initiatives in the future that seek to provide access to the coast for the community. The potential for access for the disabled and elderly is yet to reach its potential, and a sensible approach to the implementation of beach infrastructure is

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	Economy: <i>Harness Emerging Technology</i> Placemaking: <i>Creating Lively and Safe Places</i>		required if we are to confidently move forward on this front.
STATE PLANNING POLICY 14: WATER SECURITY AND QUALITY			
Ensure our water supply, stormwater and wastewater infrastructure meets the needs of a growing population and economy while balancing environmental outcomes.	Environment: <i>Building and Environmentally Resilient City</i> Environment: <i>Using Resources Efficiently</i> Environment: <i>Fostering an Environmentally Connected Community</i> Placemaking: <i>Creating Lively and Safe Places</i>	?	There needs to be some acknowledgement that developers must contribute to the upgrade of council stormwater infrastructure if the State Government's objective is to grow the population. It is recommended that this Policy is linked to the development and applicability of future Infrastructure Agreements.
STATE PLANNING POLICY 15: NATURAL HAZARDS			
Protect key coastal areas and critical infrastructure at risk from sea level rise, coastal erosion and storm surges.	Environment: <i>Building and Environmentally Resilient City</i> Environment: <i>Using Resources Efficiently</i> Environment: <i>Fostering an Environmentally Connected Community</i> Placemaking: <i>Creating Lively and Safe Places</i>	?	This is an important policy that helps future-proof the coastal interface. However, there needs to be some science behind the Policy because there is presently no reliable 'risk' analysis when assessing development proposals, particularly where located within the critical benchmark of 100m from the mean high tide mark. Although a politically sensitive issue, if the Policy is to resonate, then it needs to be more robust than a general statement.

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STATE PLANNING POLICY 16: EMISSIONS AND HAZARDOUS ACTIVITIES			
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.	Environment: <i>Building and Environmentally Resilient City</i>	?	The word ' <i>managed</i> ' needs to be replaced with ' <i>remediated</i> ' as there are no safe levels of contamination, particularly in the City of Holdfast Bay, which is characterised by a high watertable, gateway for upstream stormwater, coastal reserves, a high number of child care centres and schools, and disused sites adjacent residential properties.