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Mr John Stimson
Presiding Member
Expert Panel
GPO Box 1815
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Via email: DTI.PlanningReview@sa.gov.au

Response to Discussion Papers and General Comments on the Planning System Implementation Review

Dear Mr Stimson,

Thank you for the opportunity to provide feedback on the State's planning system, post implementation of the *Planning, Development and Infrastructure Act 2016*, related legislation and the Planning and Design Code.

The SA Housing Authority (The Authority) functions as an applicant for development proposals through the *SA Housing Trust Act 1995* and referral body under schedule 9 of the *Planning, Development and Infrastructure (General) Regulations 2017*. The feedback provided in this correspondence is based on the experiences of using and working within the varying parts of South Australia's planning system.

Planning, Development Infrastructure Act 2016 (PDI Act 2016) - Public Notification & Appeals

Pursuant to section 107(6) of the *PDI Act (2016)* and Table 5-Procedural Matters (in the Planning and Design Code) all development undertaken by the Authority either individually or jointly with other persons or bodies is exempt from public notification. The exception to this relates to any development involving a residential flat building of 3 storeys or greater or demolition within a Heritage Overlay.

The current public notification trigger for development by the Authority supports timely delivery of new public housing that is aligned with customer need. The Authority delivers a range of dwelling types through its construction programs, including apartments, attached and detached properties. The current settings require notification of higher impact development applications, with other planning applications able to proceed without incurring the additional timeframe (30 days) associated with public notification.

Any changes to public notification settings for the Authority's development resulting in additional notification requirements, would be of significant concern to the Authority.

Planning and Design Code - Infill Policy

New public housing in South Australia is primarily delivered through redevelopment of existing aged Authority assets in locations that provide customers with strong access to transport and services. As such, most new public housing represents infill development. The demographic profile of public housing customers has changed significantly over time and current and waitlist customers are predominantly single and two person households, often with complex needs and requiring smaller, low-maintenance homes and gardens. Urban Infill policy is a critical enabler of realigning the public housing portfolio through redevelopment of aged housing that no longer meets customer need to deliver new, customer-aligned public housing.

The Planning and Design Code (the Code) recognises the unique role of the Authority and community housing providers in renewing public and social housing through the inclusion of the Housing Renewal General Development Policy in selected locations to provide a greater level of flexibility in the types and density of homes that can be delivered. The current policy represents an evolution of the Renewing our Streets and Suburbs (ROSAS) planning pathway that existed prior to the Code's introduction. The Housing Renewal General Development Policy has not increased the flexibility of planning policies relating to development, but it provides a more transparent process with members of the community able to see where it applies and what planning provisions the Authority's development is assessed against. While the Code has been in use for a relatively short time and future refinements to the Housing Renewal General Development Policy and where they apply may be sought once it has been sufficiently tested, the retention of Authority-specific provisions within the Code is strongly supported by the Authority. Minor amendments that could support the greater utilisation of the deemed-to-satisfy pathway are identified below.

The Code also reflects previous zoning designed to facilitate larger scale renewal contiguous Authority land holdings, now the Urban Renewal Neighbourhood Zone. These provisions provide a greater level of flexibility than most residential zones, specifically no minimum allotment size is prescribed and a higher density, mixed housing typology development can be achieved. The Urban Renewal Neighbourhood Zone provisions are strongly aligned with public housing need. The Authority will be seeking to expand the application of this Zone to future public housing renewal areas as part of the Regional Planning process to improve community awareness of the Authority's future development intentions (section 75, *PDI Act 2016*).

Expansion of the Affordable Housing Overlay/Changes to the Planning and Design Code

The Affordable Housing Overlay (AHO) within the Planning and Design Code provides private developers with access to planning incentives to deliver affordable housing outcomes. Provision of Affordable Housing is not currently mandatory; the Panel may consider whether revising this status to be supported by an offset scheme would be appropriate to provide for future affordable housing development in South Australia.

The Authority is acutely aware of the rising cost of materials, labour, land and supply chain issues weigh heavily on feasibility; which is why consideration of an offset fund may be more favourable than providing affordable housing outcomes in high end development applications.

The AHO is currently limited in its application in metropolitan areas. Delivery of State Planning Policy 6 – Housing Supply and Diversity would be assisted through an expansion of the Affordable Housing Overlay into localities which are expected to experience increased

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residential development in the medium to long term. It is recommended that the AHO is expanded to focus on public transport routes that are high frequency to provide cost of living relief. The Panel may also consider expansion of the AHO into more Activity Zones across Greater Adelaide to support mixed use development.

Significant residential developments through sale of government land contribute substantially to meeting the intention of the State Planning Policy 6 – Housing Supply and Diversity. These Affordable Housing outcomes are secured through legally enforceable obligations attached to the sale of government land through contracts and DPC 114 – Sale of Government Land.

The current dwelling typologies typically developed by private industry within the inner metro are multistorey in their form. Private industry should be strongly encouraged to consider the ‘missing middle’ to provide diversity of living options and density to meet the market expectations and needs and a mix of tenure types (social, rental and home ownership).

A method of balancing delivery options and locations could be a catalyst site policy within the AHO. The catalyst site provisions may allow strategic master planning of super lots to provide a balance of open space, local access, services and dwellings through principles of good design.

The catalyst site policy within the City Living Zone and East Terrace Subzone provides additional height that exceeds the technical numerical values and while the current AHO incentives offer additional height, the Panel may wish to encourage and emphasize diversity of dwellings or other good design principles to meet the requirements for planning assessment.

Deemed to Satisfy Pathway

The Discussion Papers detail applications which are mostly performance assessed with the Deemed-to-Satisfy (DTS) pathway being underutilised and not providing a streamlined pathway to planning consent. The Authority would welcome a general review of the DTS pathway, but particularly in respect to the Housing Renewal General Development Policy as this is the primary driver for the Authority’s built form outcomes.

The Authority can generally design dwellings to align with the Housing Renewal General Development Policy that are aligned to the private land, such as setbacks, soft landscaping, private open space, carparking and so on; but proposals fall out of the DTS pathway is in relation to the policies pertaining to the public land such as:

Vehicle Access – DTS/DPF 17.2 (a) or (b):

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Vehicle access to designated car parking spaces satisfy (a) or (b):

- is provided via a lawfully existing or authorised access point or an access point for which consent has been granted as part of an application for the division of land
- where newly proposed, is set back:
 - 0.5m or more from any street furniture, street pole, infrastructure services pit, or other stormwater or utility infrastructure unless consent is provided from the asset owner
 - 2m or more from the base of the trunk of a street tree unless consent is provided from the tree owner for a lesser distance
 - 6m or more from the tangent point of an intersection of 2 or more roads
 - outside of the marked lines or infrastructure dedicating a pedestrian crossing.

Vehicle Access – DTS/DPF 17.4 (1), (2) and (3)

Where on-street parking is available abutting the site's street frontage, on-street parking is retained in accordance with the following requirements:

- 1. minimum 0.33 on-street spaces per dwelling on the site (rounded up to the nearest whole number)*
- 2. minimum car park length of 5.4m where a vehicle can enter or exit a space directly*
- 3. minimum car park length of 6m for an intermediate space located between two other parking spaces.*

In relation to DTS/DPF 17.2, the Authority recognises the importance of councils having decision making control in the provision of their assets and we recognise the difficulty the authors of this policy would have had in striking an appropriate balance that serves the development industry and the local governments.

As the Panel would be aware, persons wishing to undertake works on council land such as creating a new vehicle access or proposing removal of a tree on verge can lodge an application with the relevant council under Section 221 of the *Local Government Act 1999*. Once that authorisation is obtained then the development application can be undertaken, perhaps as DTS if all relevant criteria are met. The Section 221 process does, however, take some time and is not regulated in the same way that the process under the *Planning Development and Infrastructure Act 2016* regulates assessment timeframes.

As a result, it is generally recognised that it is a simpler process to lodge for a Performance Assessed application and deal with these matters via the development application process, and lodge a subsequent Section 221 application thereafter as necessary.

The implication of the proposal not being DTS is that under a Performance Assessed stream, the relevant authority becomes the State Planning Commission (SPC).

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Under Regulation 23 of the *Planning, Development and Infrastructure (General) Regulations 2017*, the local council is referred the application to comment on the below matters:

- i. Essential infrastructure
- ii. Traffic
- iii. Waste management
- iv. Stormwater
- v. Public open space
- vi. Other public assets and infrastructure
- vii. The impact of the proposed development on any local heritage place
- viii. Any other matter determined by the State Planning Commission

This mechanism can be used in some instances for quite detailed stormwater, waste management, tree management, verge treatment and increased specifications for vehicle access and a variety of other matters that ordinarily wouldn't be raised if the DTS pathway was utilised. These matters are often slowing down the application process, for development applications which are often quite close to being Deemed-to-Satisfy if Council. Noting there appears to be a general reluctance in the industry for 'minor variations' to be assessed and accepted by relevant authorities as allowed for by Section 106(2) of the *Planning, Development and Infrastructure Act 2016*.

Opportunity exists for the DTS polices to be revised in a manner that clearly allows for envisaged development to occur and still strikes an asset management balance from a local government perspective. The Authority would welcome further involvement with these discussions.

In relation to DTS/DPF 17.4, given a large percentage of our dwelling proposals are for infill development they often involve the creation of multiple inverts in addition to any existing invert/s associated with the subject land. Given narrow frontage widths, we regularly find that this DTS/DPF is not met and therefore the proposal falls into a Performance Assessed stream as a result. Given each dwelling is required to provide carparking in accordance with DTS/DPF 14.1 – Car Parking and group dwelling arrangements of four or more dwellings are required to provide additional communal/visitor parking on site, we suggest that amount of vehicle parking is addressed by the development on the private land and on-street carparking need not be a consideration under the DTS pathway.

The Authority wishes to make it quite clear that councils should be able to protect their assets in relation to private development, we do however wish to reiterate that the current system does not allow for the DTS pathway to be utilised to its potential due to the complex interaction between the private land and public land.

Due to confidentiality, we have not detailed specific development applications as examples to support the above, however we are happy to release this to the Panel upon request.

Lodgement of SAHT Applications via Development Application Processing (DAP)

Currently all development applications lodged by the Authority are directed to the relevant council area in which they're located, or to Private Certifier. However, except for DTS developments and some other exceptions (Schedule 6 (1) of Planning Development and Infrastructure (General) Regulations 2017), the local council are often not the relevant authority.

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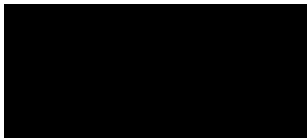
The Authority has experienced delays in verification while the local council recognise this before sending to SPC as the relevant authority.

The Authority suggests a technical fix whereby Authority applications are directed to the SPC in the first instance where SPC is the relevant authority; Authority employee logins, or those who act on our behalf, could be the trigger to limit the functionality within the DAP system.

For example, a development application was lodged with council on 10 October 2022, and took 11 business days before being reallocated to the SPC as the relevant authority. SPC then undertook verification over a period of four business days with the process completed on 31 October 2022. The verification process took 15 business days/three weeks to complete for that development application. As an Authority development, the proposal should be considered by SPC and the DAP provides no alternative but to send the development application via the council in the first instance (or a Private Certifier). The Authority can provide details of this example to the Panel separately upon request.

Once again, thank you for the opportunity to provide feedback.

Yours sincerely



Michael Buchan
CHIEF EXECUTIVE
SA HOUSING AUTHORITY

14 / 12 / 2022

Attachment(s)

1. Structured response to Expert Panel on Planning

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Planning System Implementation Review

SA Housing Authority Response



Government of South Australia
SA Housing Authority

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Introduction

The role of the SA Housing Authority in the SA planning system

The SA Housing Authority (the Authority) reports to the Minister for Human Services and the South Australian Housing Trust Board to administer the *South Australian Housing Trust Act 1995*. The Authority has landlord, private rental assistance, social and public housing responsibilities.

In addition to these responsibilities the Authority facilitates the support for South Australians to increase their ability to achieve successful housing outcomes. Further, the Authority is expected to support or promote programs or initiates within the private or not-for-profit sectors to meet housing needs.

The *Planning, Development and Infrastructure Act 2016* in conjunction with the *SA Housing Trust Regulations 2010* give the Authority the power define affordable housing for assessment against the Planning and Design Code. The Authority has power of direction to the relevant authority for conditions of development approval and this is complemented by delegated authority for Land Management Agreements to be registered on certificates of title to secure the provision of affordable housing.

As a result of legislated administrative responsibilities, the Authority plays multiple roles in the planning system:

- applicant lodging applications and developing housing product
- referral body for private development applications seeking planning concessions, and
- strategic directions for housing in the planning system across the State.

Scope of the Expert Panel on Planning's review

To honour an election commitment, the Minister for Planning, Hon Nick Champion MP commissioned an expert panel to conduct a review into the recently introduced planning reforms, including:

- The *Planning, Development and Infrastructure Act 2016*
- the Planning and Design Code and related instruments, as it relates to infill policy, trees, character, heritage and car parking
- the ePlanning system, to ensure it is delivering an efficient and user-friendly process and platform
- the PlanSA website, to check usability and ease of community access to information.

Response to the Expert Panel on Planning

Structured response to the review

(when response box is greyed out there is no response or the question(s) is duplicated and not answered twice)

Discussion Paper – e-Planning System and the PlanSA Website	
	SA Housing Authority (the Authority’s) Response
Website Re-Design	
1. Is the PlanSA website easy to use?	The Authority’s use of the PlanSA website is limited with more use of SAPP and the Code directly.
2. What improvements to the PlanSA design would you make to enhance its usability?	The landing page is quite detailed and could be scaled back, an in-depth survey of the relevant audiences may assist the first page of information.
Mobile Application for Submission of Building Notifications and Inspections	
3. Would submitting building notifications and inspections via a mobile device make these processes more efficient?	
4. Where relevant, would you use a mobile submission function or are you more likely to continue to use a desktop?	
Online Submission Forms	
5. Is there benefit to simplifying the submission process so that a PlanSA login is not required?	From an agency perspective, unless a temp or contractor is lodging for the Authority, there is no expected benefit.
6. Does requiring the creation of a PlanSA login negatively impact user experience?	
7. What challenges, if any, may result from an applicant not having a logon with PlanSA?	Loss of access to a Development Application and the approval.
Increase Relevant Authority Data Management	
8. What would be the advantages of increasing relevant authorities’ data management capabilities?	
9. What concerns, if any, do you have about enabling relevant authorities to ‘self-service’ changes to development applications in the DAP?	
Inspection Clocks	

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10. What are the advantages of introducing inspection clock functionality?	
11. What concerns, if any, would you have about clock functionality linked to inspections?	
12. What, if any, impact would enabling clock functionality on inspections be likely to have on relevant authorities and builders?	
Collection of lodgement fee at submission	
13. Would you be supportive of the lodgement fee being paid on application, with planning consent fees to follow verification?	
14. What challenges, if any, would arise as a consequence of 'locking in' the Code provisions at lodgement? How could those challenges be overcome?	
Combined Verification and Assessment Processes	
15. What are the current system obstacles that prevent relevant authorities from making decisions on DTS and Performance Assessed applications quickly?	<p>No built in 'tick box assessment' for DTS and can't be done at verification stage.</p> <p>Performance assessment has varying levels of complexity within the pathway. Some elements may work with checklist, but others will require an expanded assessment.</p> <p>At lodgement stage nominate relevant authority – I.e., the Authority's developments default to Council and should be expedited to SPC/SCAP to ensure verification occurs within 5 days. The Authority's covering letter provides more detail in this example.</p>
16. What would be the advantages of implementing a streamlined assessment process of this nature?	Expedited assessment.
17. What, if any, impact would a streamlined assessment process have for non-council relevant authorities?	
Automatic Issue of Decision Notification Form	
18. What are the advantages of the e-Planning system being able to automatically issue a Decision Notification Form?	
19. What do you consider would be the key challenges of implementing an automatic system of this nature?	

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20. If this was to be implemented, should there be any limitations attached to the functionality (i.e., a timeframe for payment of fees or the determination will lapse)?	
Building Notification through PlanSA	
21. Would you be supportive of mandating building notifications be submitted through PlanSA?	
22. What challenges, if any, would arise as a consequence of removing the ability for building notifications to be received by telephone or in writing to a relevant council? How could those challenges be overcome?	
23. Would this amendment provide efficiencies to relevant authorities?	
Remove Building Consent Verification	The Authority would be supportive of this initiative.
24. Would you be supportive of removing the requirement to verify an application for building consent?	
Concurrent Planning and Building Assessment	
25. What challenges, if any, would arise as a consequence of removing building consent verification? How could those challenges be overcome?	
26. What would be the implications of enabling multiple consents to be assessed at the same time?	
Automatic Assessment Checks for DTS Applications	The Authority's covering letter provides more detail in this example.
1. What do you consider would be the key benefits of implementing an automatic system of this nature?	
2. What do you consider would be the key challenges of implementing an automatic system of this nature?	
3. Would you be supportive of the Government investing in developing this technology so that it may integrate with the e-Planning system?	Yes – for more efficient assessment processing
3D Modelling for Development Application Tracker and Public Notification	Taller buildings would benefit for visuals.
4. What do you consider would be the key benefits of the e-Planning system being able to display 3D models of proposed developments?	Modelling would assist to verify views and see what impact is.

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<p>5. Do you support requiring certain development applications to provide 3D modelling in the future? If not, why not? If yes, what types of applications would you support being required to provide 3D modelling?</p>	
<p>6. Would you be supportive of the Government investing in developing this technology so that it may integrate with the e-Planning system?</p>	<p>May not be relevant for all developments, so should be optional.</p>
<p>Augmented Reality Mobile Application 7. Would you be supportive of the Government investing in developing this technology so that it may integrate with the e-Planning system?</p>	<p>The Authority would be supportive of this initiative.</p>
<p>Accessibility through Mobile Applications 8. Do you think there is benefit in the e-Planning system being mobile friendly, or do you think using it only on a computer is appropriate?</p>	
<p>9. Would you be supportive of the Government investing in developing this technology so that the PlanSA website and the e-Planning system is functional on mobile?</p>	
<p>Public Notifications and Appeals 1. What type of applications are currently not notified that you think should be notified?</p>	<p>The Authority's covering letter provides more detail in this example.</p>
<p>2. What type of applications are currently notified that you think should not be notified?</p>	
<p>3. What, if any, difficulties have you experienced as a consequence of the notification requirements in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.</p>	
<p>4. What, if any, difficulties have you experienced as a consequence of the pathways for appeal in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.</p>	
<p>5. Is an alternative planning review mechanism required? If so, what might that mechanism be (i.e. merit or process driven) and what principles should be considered in establishing that process (i.e. cost)?</p>	
<p>Accredited Professionals</p>	

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<p>6. Is there an expectation that only planning certifiers assess applications for planning consent and only building certifiers assess applications for building consent?</p>	
<p>7. What would be the implications of only planning certifiers issuing planning consent?</p>	
<p>8. Would there be any adverse effects to Building Accredited Professionals if they were no longer permitted to assess applications for planning consent?</p>	
<p>Impact Assessed Development 9. What are the implications of the determination of an Impact Assessed (Declared) Development being subject to a whole-of-Government process?</p>	<p>The whole-of-government process should be front loaded – i.e. if an agency is opposed to the declaration of an impact assessed development due to unavoidable outcomes, the proposal should not be declared as an impact assessed development by the Minister.</p>
<p>Infrastructure Schemes 10. What do you see as barriers in establishing an infrastructure scheme under the PDI Act?</p>	<p>The Authority is open to using Infrastructure Schemes in the future, but the process isn't commonplace within the wider development industry as yet. As a result the Authority hasn't tested the effectiveness or otherwise.</p>
<p>11. What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?</p>	
<p>12. Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?</p>	

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<p>Local Heritage in the PDI Act 13. What would be the implications of having the heritage process managed by heritage experts through the Heritage Places Act (rather than planners under the PDI Act)?</p>	
<p>14. What would be the implications of sections 67(4) and 67(5) of the PDI Act being commenced?</p>	
<p>Deemed Consents 15. Do you feel the deemed consent provisions under the PDI Act are effective?</p>	
<p>16. Are you supportive of any of the proposed alternative options to deemed consent provided in this Discussion Paper? If not, why not? If yes, which alternative (s) do you consider would be most effective?</p>	
<p>Verification of development applications 17. What are the primary reasons for the delay in verification of an application?</p>	<p>The Authority's covering letter provides more detail in this example.</p>
<p>18. Should there be consequences on a relevant authority if it fails to verify an application within the prescribed timeframe?</p>	
<p>19. Is there a particular type or class of application that seems to always take longer than the prescribed timeframe to verify?</p>	
<p>20. What would or could assist in ensuring that verification occurs within the prescribed timeframe?</p>	<p>The Authority's covering letter provides more detail in this example.</p>
<p>21. Would there be advantages in amending the scope of Schedule 8 of the PDI Regulations?</p>	

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Discussion Paper – Planning, Development and Infrastructure Act 2016	
	SA Housing Authority (the Authority's) Response
<p>Public Notifications and Appeals</p> <p>1. What type of applications are currently not notified that you think should be notified?</p>	
<p>2. What type of applications are currently notified that you think should not be notified?</p>	
<p>3. What, if any, difficulties have you experienced as a consequence of the notification requirements in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.</p>	
<p>4. What, if any, difficulties have you experienced as a consequence of the pathways for appeal in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.</p>	
<p>5. Is an alternative planning review mechanism required? If so, what might that mechanism be (i.e. merit or process driven) and what principles should be considered in establishing that process (i.e. cost)?</p>	
<p>Accredited Professionals</p> <p>6. Is there an expectation that only planning certifiers assess applications for planning consent and only building certifiers assess applications for building consent?</p>	
<p>7. What would be the implications of only planning certifiers issuing planning consent?</p>	
<p>8. Would there be any adverse effects to Building Accredited Professionals if they were no longer permitted to assess applications for planning consent?</p>	

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<p>Impact Assessed Development 9. What are the implications of the determination of an Impact Assessed (Declared) Development being subject to a whole-of-Government process?</p>	
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<p>11. What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?</p>	
<p>12. Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?</p>	
<p>Local Heritage in the PDI Act 13. What would be the implications of having the heritage process managed by heritage experts through the Heritage Places Act (rather than planners under the PDI Act)?</p>	
<p>14. What would be the implications of sections 67(4) and 67(5) of the PDI Act being commenced?</p>	
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<p>21. Would there be advantages in amending the scope of Schedule 8 of the PDI Regulations?</p>	

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Discussion Paper – Planning and Design Code Reform Options	
	SA Housing Authority (the Authority's) Response
Character and Heritage 1. In relation to prong two (2) pertaining to character area statements, in the current system, what is and is not working, and are there gaps and/or deficiencies?	
2. Noting the Panel's recommendations to the Minister on prongs one (1) and two (2) of the Commission's proposal, are there additional approaches available for enhancing character areas?	
3. What are your views on introducing a development assessment pathway to only allow for demolition of a building in a Character Area (and Historic Area) once a replacement building has been approved?	
4. What difficulties do you think this assessment pathway may pose? How could those difficulties be overcome?	
Trees Native Vegetation 5. What are the issues being experienced in the interface between the removal of regulated trees and native vegetation?	
6. Are there any other issues connecting native vegetation and planning policy?	
Tree Protections 9. What are the implications of reducing the minimum circumference for regulated and significant tree protections?	
10. What are the implications of introducing a height protection threshold, to assist in meeting canopy targets?	
11. What are the implications of introducing a crown spread protection, to assist in meeting canopy targets?	
12. What are the implications of introducing species-based tree protections?	
Distance from Development 13. Currently you can remove a protected tree (excluding <i>Agonis flexuosa</i> (Willow Myrtle) or <i>Eucalyptus</i> (any tree of the genus) if it is within ten (10) metres of a dwelling or swimming pool. What are the implications of reducing this distance?	

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14. What are the implications of revising the circumstances when it would be permissible to permit a protected tree to be removed (i.e. not only when it is within the proximity of a major structure, and/or poses a threat to safety and/or infrastructure)?	
Urban Tree Canopy Off Set Scheme 15. What are the implications of increasing the fee for payment into the Off-set scheme?	
16. If the fee was increased, what are your thoughts about aligning the fee with the actual cost to a council of delivering (and maintaining) a tree, noting that this would result in differing costs in different locations?	
17. What are the implications of increasing the off-set fees for the removal or regulated or significant trees?	
Public Realm Tree Planting 18. Should the criteria within the Planning and Development Fund application assessment process give greater weighting to the provision of increased tree canopy?	

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<p>Infill</p> <p>Design Guidelines</p> <p>19. Do you think the existing design guidelines for infill development are sufficient? Why or why not?</p>	<p>Design Guidelines would assist applicants to consider different typologies and deliver density through good design principles.</p> <p>The risk to design guidelines include repetitive form and applicants taking the guidelines as mandatory or prescriptive in their nature.</p>
<p>20. Do you think there would be benefit in exploring alternative forms of infill development? If not, why not? If yes, what types of infill development do you think would be suitable in South Australia?</p>	<p>Infill development creates opportunity for affordable housing through varying dwelling typologies.</p> <p>The performance assessment process against the Planning and Design Code requires a balancing of outcomes and community expectations.</p> <p>The fulfilment of the State Planning Policy 6 – Housing Supply and Diversity is important to consider in this context with the intention to meet the needs of the community, their life stages, lifestyles and the varying cultural groups i.e. multi-family households.</p>
<p>Strategic Planning</p> <p>21. What are the best mechanisms for ensuring good strategic alignment between regional plans and how the policies of the Code are applied spatially?</p>	<p>The Authority’s covering letter provides more detail in this example.</p>
<p>22. What should the different roles and responsibilities of State and local government and the private sector be in undertaking strategic planning?</p>	<p>Secure and affordable housing provides a cost benefit ratio of 1:2 and has positive impacts on health, education and crime prevention (Source – SGS Economics and Planning). The returns for secure housing outperform other major infrastructure projects. The benefits of adequate housing equate to \$110 billion in present value terms. South Australia is estimated to save \$4.3 billion (at net present value) over the next 30 years with outlays on social or affordable housing.</p> <p>State and local governments should work together to understand the existing conditions and partner with relevant bodies to streamline development assessment in the future.</p>

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	If Council land is locked up for residential development because of lack of services, growth in the regions cannot occur which detrimentally impacts the community.
<p>Carparking Code Policy 23. What are the specific car parking challenges that you are experiencing in your locality? Is this street specific and if so, can you please advise what street and suburb.</p>	<p>General comment on Carparking:</p> <p>The Affordable Housing Overlay provides planning concessions with a reduction in carparks if affordable housing is provided.</p> <p>The Authority is open to further discussions around this matter.</p>
24. Should car parking rates be spatially applied based on proximity to the CBD, employment centres and/or public transport corridors? If not, why not? If yes, how do you think this could be effectively applied?	<p>This depends on the intention of the policy – is it to provide car parking for peak times or an average? Changes to behaviours because of COVID19 may impact the need for car parking.</p> <p>The Authority is open to further discussions around this matter.</p>
25. Should the Code offer greater car parking rate dispensation based on proximity to public transport or employment centres? If not, why not? If yes, what level of dispensation do you think is appropriate?	<p>This should be linked to the discussion around EVs, bicycles and other vehicles.</p> <p>The Authority is open to further discussions around this matter.</p>
26. What are the implications of reviewing carparking rates against contemporary data (2021 Census and ABS data), with a focus on only meeting average expected demand rather than peak demand?	<p>There needs to be other options to support this – i.e. better connections via bicycle, motorbike, car sharing, car leasing, E-scooters etc.</p> <p>The Authority is open to further discussions around this matter.</p>
27. Is it still necessary for the Code to seek the provision of at least one (1) covered carpark when two (2) on-site car parks are required?	

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<p>Design Guidelines 28. What are the implications of developing a design guideline or fact sheet related to off-street car parking?</p>	<p>The Authority is open to further discussions around this matter.</p>
<p>Electric Vehicles 29. EV charging stations are not specifically identified as a form of development in the PDI Act. Should this change, or should the installation of EV charging stations remain unregulated, thereby allowing installation in any location?</p>	<p>Integration of EV charging to new developments – mixed use and non-residential i.e. petrol filling stations, shopping centres, public spaces and amenities.</p>
<p>30. If EV charging stations became a form a development, there are currently no dedicated policies within the Code that seek to guide the design of residential or commercial car parking arrangements in relation to EV charging infrastructure. Should dedicated policies be developed to guide the design of EV charging infrastructure?</p>	
<p>Car Parking Off-Set Schemes 31. What are the implications of car parking fund being used for projects other than centrally located car parking in Activity Centres (such as a retail precinct)?</p>	
<p>32. What types of projects and/or initiatives would you support the car parking funds being used for, if not only for the establishment of centrally located car parking?</p>	
<p>33. Do you think there would be benefit from the Commission preparing local road Design Standards?</p>	

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Version Control

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