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Your Ref:

Our Ref:

20 September 2018

Sally Smith
General Manager, Planning and Development
Attn: Sarah Elding
Department of Planning, Transport and Infrastructure
GPO Box 1533
ADELAIDE SOUTH AUSTRALIA 5001

Dear Sally

Feedback on draft State Planning Policies

This is the first major consultation under the Community Engagement Charter and sets the tone for future engagement. It is therefore critically important that this consultation is thorough and provides adequate time for meaningful feedback to be obtained, collated and provided. Due to the sheer size of the document and short consultation period we have not had adequate opportunity to present the draft State Planning Policies (SPPs) to our Elected Members of Council. On this basis we are not satisfied that the engagement process and period has been satisfactory.

As we have not had the opportunity to present the SPPs to our Council, the comments contained in this correspondence are from the council staff and do not reflect the view point of the Elected Members of Council.

Council officers have had the opportunity to review the SPPs and have assembled both general feedback and specific feedback on individual SPPs. We trust that you will find this feedback constructive and will lead to amendments to the SPPs and potentially additional SPPs where there is agreement that policy gaps exist.

General Feedback

Following a review of the content of the 16 SPPs it is considered that there are a number of areas that the policies do not address or should provide greater emphasis and direction around. To assist this process, a review of the SPPs against Council's Community Plan, '[Onkaparinga 2035](#)' and in particular the 'Focus Commitments' was undertaken. This process served to identify areas of importance to Council that are considered not to be adequately addressed in the SPPs.

Sport and recreation: open space and community facilities

Of particular importance are the areas of open space, sport and recreation and community facilities. These focus areas are fundamental to community in Onkaparinga and indeed across the State. The current suite of SPPs does not focus on these areas and further there is only occasional and indirect reference to them.



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Given that Onkaparinga is a growth region it is important that these factors are clearly recognised at the highest level and filter down in planning policy as new and renewing areas are planned and develop.

Tourism

The role and importance of tourism is mentioned in a number of the SPPs. The question is raised, given its importance to the South Australian economy, why a stand-alone SPP has not been included. This would enable policy direction to feed into Regional Plans and also provide a platform to address emerging issues such as the rise and role of online short term stay accommodation such as Airbnb.

Education

While not a key focus area in Onkaparinga 2035 (Council's Community Plan), it is noted that education is not adequately addressed in the SPPs. In view of the 'knowledge economy' and the importance of tertiary education, state level planning policy relating to education would be valuable. The development of areas such as Tonsley and Flinders, the potential merger of Adelaide University and Uni SA plus the need for student accommodation and facilities ('university towns and precincts') highlight the need to integrate these into strategic level planning policy.

Heritage and character

While SPP 7 - Cultural Heritage has been included, it is manifestly inadequate. It fails to adequately recognise built heritage and does not distinguish between European and Aboriginal heritage. There is significantly more policy direction that could be included for both European and Aboriginal heritage.

Communication and Technology

The SPPs afford limited recognition to the dramatic changes that new technology is bringing to almost all areas of modern life. The SPPs individually either need to recognise these emerging changes and then develop policy to address these changes (both positive and negative) or alternatively a separate SPP should be developed to achieve this.

Other general comments

The SPPs generally have an Adelaide metropolitan 'feel', for example there are no photos of the regions like the West Coast, Outback, South East or Riverland, which would help reinforce the 'State' focus. There is reference to coast, plains and hills but not mountains and the Outback.

The SPPs are very high level and it is often the Non-statutory Guidance Notes (for the Regional Plans and the Planning and Design Code) that have equally useful or in some instances more useful/tangible policy guidance than the policies themselves. It may be worth considering integrating these more into the SPPs so they may have more weight.

The urban renewal principles aimed toward minimising the encroachment of urban areas on places of rural, landscape or environmental significance is supported.

In relation to housing targets and choice clarification is needed as to what is considered to be 'regional' South Australia.

Specific Feedback

Specific feedback in relation to the sixteen SPPs is provided in table format in attachment 1. The table largely following a pattern of 'what we like', 'concerns' (what we don't like) and 'comments'.

We welcome the opportunity to discuss the matters raised in our submission or provide further explanation and ask that you contact Jonathan Luke, Senior Development Policy Planner on [REDACTED] or email [REDACTED] if you would like to discuss further.

Yours sincerely



Alison Hancock
Director Corporate and City Services

Policy	What we like	What we don't like	Additional comments
GENERAL COMMENTS			
<ul style="list-style-type: none"> The State Planning Policies (SPPs) generally have an Adelaide metropolitan 'feel', for example there is reference to coast plains and hills but not mountains. There are no photos of the regions like the West Coast, Outback, South East or Riverland, which would help reinforce the 'State' focus. Often the 'Non statutory Guidance Notes' have equally or in some instances more useful/tangible policy guidance than the policies themselves. It may be worth considering integrating these more into the SPPs so they may have more weight. 			
PRINCIPLES OF GOOD PLANNING			
	<p>Urban renewal principles 'The encroachment of urban areas on places of rural, landscape or environmental significance is to be avoided other than in exceptional circumstances'. However we need to understand what constitutes 'exceptional circumstances'. This is something to consider in the context of the recent Character Preservation Act review, particularly around the issue of township boundaries.</p>	<p>It is important that consistent terminology is used throughout the document; eg the principles reference high quality design (Act principles) yet SPP2 references good design (ODASA principles).</p>	<p>It would be beneficial to see a principle expressed in terms of sensitive development with regard to the social and cultural aspects (including Aboriginal cultural heritage aspects) of the location. This could possibly be achieved via the High Quality Design principle (regarding the comments around local setting and context).</p>
ADDITIONAL TARGETS			
<p>85% of new housing in regional South Australia will be built within townships and defined settlements.</p>			<p>What is considered to be 'regional' South Australia? Is it the areas outside of the Greater Adelaide Planning Region or does it include the outer metropolitan areas within</p>

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			Character Preservation Districts or EFPAs and / or Outer Greater Adelaide?
Housing choice in regional cities and towns will increase by 10% to meet changing household needs in regional South Australia by 2045			As above.
LEGISLATED STATE PLANNING POLICIES			
SPP 1: INTEGRATED PLANNING	<p>1.4 - <i>Manage growth in an orderly sequence to enable the cost effective and timely delivery of investment in infrastructure commensurate with the rate of population growth into the future.</i></p> <p>This policy should require the strategic identification of infrastructure required to facilitate growth and preferably cost this.</p> <p>This policy should call up the need to develop contribution schemes/plans in order to cover and apportion the cost of new/upgraded infrastructure triggered by new development. This should be examined at a state, regional and local level, as there is a need for state agency 'buy-in' for the planning and delivery of state</p>	<p>Policies</p> <p>1.1 – <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> <p>It is considered that this policy and its wording are attempting to cover too many aims.</p> <p>Furthermore, the aim of increasing density along transport routes can lead to development with poor amenity. It is necessary to distinguish the nature and function of the transport route in order to determine whether it would be desirable to expose more people to amenity impacts of noise and</p>	<p>The diagram on page 21 is useful for communicating different development form and use, but the descriptors in the table are a little simplistic; eg reference to medium density in middle suburbs is a somewhat general as it does not acknowledge low density character or transport corridors.</p> <p>With respect to the Character Preservation Districts, this is separate legislation to the EFPA which sits under the PDI Act. It needs to be referenced/included where EFPAs are referenced.</p> <p>1.6 – This policy should provide greater emphasis and direction around the type of development required in Greater Adelaide – ie encouraging and enabling infill and</p>

Policy	What we like	What we don't like	Additional comments
	<p>and regional infrastructure.</p>	<p>pollution etc. Is it a 'link' or a 'place'?</p> <p>1.2 - <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 Production Areas legislation.</i></p> <p>Needs to include reference to Character Preservation Districts.</p> <p>1.3 - <i>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.</i></p> <p>This may require a review of the Character Preservation District especially in the south.</p> <p>1.7 – We do not consider that reduced car parking is realistic to encourage in areas other than the CBD and inner city.</p>	<p>compact centres to minimise sprawl. Note that 'compact' urban form is mentioned in SPP 5.1.</p> <p>1.8 – 'low to medium rise' needs to be defined in the SPPs and not rely on the 30 Year Plan definition.</p> <p>- Broad density targets need to be commensurate with existing and likely future capacity to be able to provide/upgrade infrastructure and facilities; eg locating higher densities in isolated communities is not desirable.</p> <p>The following should be considered as part of this SPP:</p> <ul style="list-style-type: none"> • Ensure development maintains or enhances scenic amenity of natural landscapes, views and vistas (this links into the tourism value of landscapes and coast). • Biodiversity and ecological value of landscapes and coastal and riverine environments be reflected in this SPP at a high level.
<p>SPP 2: DESIGN QUALITY</p>	<p>Generally the policies contained</p>	<p>Given that the Planning and Design Code does not appear to</p>	<p>It is unclear how this policy will translate into the P&D Code. Good</p>

Policy	What we like	What we don't like	Additional comments
	<p>under this SPP are supported.</p> <p>2.3- The purpose of this policy is not clear until the end of the sentence, by which stage it is lost.</p> <p>2.4 – <i>Ensure design advice is considered early in the planning process for complex developments and utilities consistent and credible processes (such as a Design Review) to ensure better outcomes.</i></p> <p>This idea has merit, but needs to be simple and transparent. Is a 'design review panel' system similar to the NSW SEPP 65 being considered? What type of 'complex applications' and what triggers are being considered?</p>	<p>accommodate the articulation of 'desired character', the assessment of development in 'context' will be even more subjective than under the current planning system, leading to increased uncertainty.</p> <p>2.1 - The principles of Good Design are straight from those prepared and used by ODASA. It is considered that they are a little vague and could be more explicit to increase their usefulness. For example, the <i>NSW SEPP 65 Design Quality of Residential Apartment Development</i> (although specific to medium high density residential development) expands the design quality principles and provides more tangible context. These need to be included expanded in the P&D Code in order to be applied to development.</p> <p>There is a significant gap in relation to site analysis including consideration of overshadowing, overlooking, appearance and acoustics. It is these design quality elements that commonly impact people.</p> <p>2.2 – This policy tries to do too many things and should be</p>	<p>design is important in both simple and complex applications, therefore it is important that these policies transfer to deemed to satisfy and performance assessed development.</p> <p>There is a lack of consideration / reference to 'character'. There is a direct correlation of influence between 'good design' and 'character'. Character is mentioned in the Principles of Good Design, however it is considered that desired character should be reflected.</p> <p>2.8 – <i>Enable quality design solutions in the planning and design code for low-medium density development.</i></p> <p>It is important that design solutions include key matters that can be codified such as WSUD, energy efficiency and soft/green landscape area. The high volume of more simple applications highlights the need that these applications are assessed against sustainability criteria.</p> <p>Furthermore, this policy should also promote quality design solutions for</p>

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		<p>separated into distinct policies. There is not a close nexus between access and inclusion planning with Water Sensitive Urban Design (WSUD) and environmentally sustainable design. These items need their own policy definition. Green infrastructure should also be listed.</p> <p><i>2.6 – "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> <p>Three matters need to be considered. Firstly, this should also include the aim to accommodate private green space within medium to high density development, not just the public domain and streetscape (to assist achieving urban greening targets and climate change objectives). This will warrant the development of policy to address soft landscape percentage and deep root planting zones within these forms of development.</p>	<p>commercial development; eg integration of large format retail/bulky goods/supermarkets into existing or proposed communities and mixed use areas.</p> <ul style="list-style-type: none"> - This SPP should more overtly recognise the impact that design can have on the social determinants of health and general wellbeing, steering design in the direction of improvements in both of these. The work done by the Heart Foundation on Healthy By Design is an example of the connection between urban form and wellbeing. - The role and voice of community/stakeholders in the planning and design process is somewhat absent in the policies. This SPP may provide a suitable platform to elevate this; note this is captured somewhat under 'Value' – "promote community and local investment".

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		<p>Secondly, to achieve this policy objective in areas envisaged for increased residential densities, land needed for public green space will need to be strategically identified for public acquisition, which will require the establishment of development contribution schemes to fund acquisition and development of these spaces.</p> <p>Thirdly, greenfield development should also be reflected here, not excluded.</p> <p>- The use of the term 'high quality' is very subjective. The term 'good design' is preferable given that it has been defined in the 'Principles of Good Design'.</p>	
<p>SPP 3: ADAPTIVE REUSE</p>	<p>3.6 – Planning and development incentives have the potential to be useful in encouraging adaptive reuse of older building stock. This has been successfully employed with heritage items in NSW.</p>	<p>3.4 – There is a focus on Adelaide City in this policy, which is supported, however it considered a missed opportunity not to have a policy like this focused upon former industrial/warehouse precincts (such as Tonsley and Lonsdale) given the shift in the economy away from manufacturing.</p>	<ul style="list-style-type: none"> - There is potential for a lot of crossover with SPP Cultural Heritage in terms of adaptive reuse of heritage buildings and places. - There needs to be reference to ensuring that reuse does not give rise to land use conflict or introduce a strain on existing facilities and infrastructure. - This policy will be subject to the National Construction Code (NCC).

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SPP 4: BIODIVERSITY	<p>Generally the policies contained under this SPP are sound.</p> <ul style="list-style-type: none"> - 6.2 – rehabilitation/restoration and recognition of corridors is supported given the Fleurieu has less than nine percent remnant vegetation remaining, so protecting biodiversity is not enough; it is suggested that biodiversity be integrated into development wherever possible. 	<p>There is no mention of off-setting, bio-banking or Heritage Agreements. Policy needs to recognise the need for effective mechanisms to secure, protect and preserve biodiversity and areas of environmental significance.</p>	<p>Whilst the policies of this SPP are generally considered sound, their effectiveness will be limited by the quality and extent of biodiversity mapping and spatial strategy that has been developed as a result. This work needs to be undertaken and informed by State and Commonwealth listings of species, communities and ecosystems.</p> <p>The policy objective appears focused on terrestrial biodiversity with no reference to coastal or riverine ecosystems.</p> <ul style="list-style-type: none"> - 4.1 – suggest rewording "<i>Protect from and/or minimise impacts of development on...</i>" - In relation to '<i>critical habitat</i>' the policy should be aiming to protect before habitat gets to 'critical' stage or earlier when habitat may be at a vulnerable stage. - The impacts of drainage and changes to water run-off and the water table can have a significant impact on adjacent biodiversity and natural areas, which should be considered as well as the underlying impact of land use. - 4.4 – Suggest rewording by

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			<p>changing "<i>Encourage nature based tourism...</i>" to "Facilitate [or enable] <i>nature based tourism...</i>" given that even sensitive tourism is not necessarily compatible with biodiversity objectives.</p>
<p>SPP 5: CLIMATE CHANGE</p>	<p>Generally the policies contained under this SPP are sound.</p> <p>5.3 – <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> <p>This policy is strongly supported. However there appears to be a disconnect in the wording, specifically focus needs to be on buildings <u>and</u> places to make this statement more relevant. This policy should also recognise the need to 'retain' tree canopy as well as enhance it.</p> <p>It is important that these features be included in deemed to satisfy assessment criteria to ensure high volume, smaller scale development also is built to these principles.</p>	<p>5.2 – <i>Ensure the design of public places increases climate change resilience and future liveability.</i> It is suggested that this refer to both the public and private domain.</p> <p>5.6 – <i>Protect areas that provide biodiversity and maximise opportunities for carbon sequestration.</i></p> <p>These two objectives are distinct and often competing and therefore should be separated.</p>	<ul style="list-style-type: none"> - This policy could be expanded to separate elements more clearly and address impacts and risks with relevant policy. - In the second paragraph a minor rewording of the first paragraph is suggested: "<i>The way in which we manage and design our built environment..</i>" - We consider there should be strategic planning and policy in relation to coastal retreat.

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	<p>Most of these principles are measurable and suitable for deemed to satisfy assessment.</p>		
MINISTERIAL STATE PLANNING POLICIES			
<p>SPP 6: HOUSING SUPPLY AND DIVERSITY</p>	<p>- Generally the policies presented are sound.</p> <p><i>6.2 – Ensure there is a timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.</i></p> <p>This policy is supported especially the need for infrastructure, services and facilities to be 'rolled out' in an integrated manner. This calls for strategic coordination between agencies, perhaps expressed via input into Regional Plans and also the preparation of infrastructure plans and schemes as a mechanism for timing and delivery of such.</p> <p>However this policy and policy 6.3 are enabling development in undeveloped areas. It is considered there should be more emphasis on infill and renewal of existing neighbourhoods.</p>	<p><i>6.4 – 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.</i></p> <p>- Policy will need to be established to ensure that commercial uses remain the dominant land use at ground level to avoid dilution of centres.</p> <p>- Is there technical data underpinning what densities are needed to support economic viability? These should be expressed more clearly.</p> <p><i>6.5 – Provide a permissive and enabling policy environment for housing within residential zones including the provision of small lot housing and aged care accommodation.</i></p> <p>- Is this an indication that Code assessed areas will be expanded –</p>	<p>- In relation to housing diversity there is little discussion concerning forms of housing diversity other than small lot, mixed use and aged housing. It is considered that this SPP would be the best to discuss other housing form.</p> <p>Policy 6.6 focuses on Adelaide City in relation to a variety of household forms. It is considered that this also should be expanded to regional centres and towns.</p> <p>- There is no reference to adaptive reuse in the context of residential infill such as 1 into 2, manor homes etc.</p> <p>Policy 6 should include policy encouraging the consolidated development/amalgamated lots to achieve better quality housing outcomes.</p> <p>For policy 6.3, it is suggested to add the following words to the last sentence "<i>...it is located outside of Character Preservation Districts and</i></p>

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	<p>6.7 – <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> <p>Incentives tend to be more functional and attractive to developers where there is an underlying development control for density that is able to be relaxed, to achieve an outcome such as affordable housing. Incentives for affordable housing bonuses could be deployed at the development application stage where larger site area and/or good design is achieved.</p> <p>Affordability is about more than buying a house but includes 'whole-of lifecycle costs' including utilities and transport. Changes to the National Construction Code are also integral to this principle.</p>	<p>assume yes with the application of deemed to satisfy?</p> <p>- 'Permissive and enabling policy' is acceptable where sound strategic planning has firstly established areas suitable to accommodate infill, small lot housing and/or aged care accommodation. This includes targeted areas that are well located and serviced by infrastructure and facilities. Small lot housing and aged care that is located in lower density and isolated locations is undesirable as this can lead to communities with poor amenity and access to services. Conversely, a targeted and strategic approach provides certainty and can facilitate enabling policy in those areas.</p>	<p><i>not detrimental to adjacent land uses."</i></p>
<p>SPP 7: CULTURAL HERITAGE</p>		<p>- This policy is very light on detail. There is no mention of built heritage or character areas.</p> <p>- The Objective appears to avoid mentioning built heritage by only</p>	<p>- The policy section needs to be expanded to support the objective. This involves the identification and protection of heritage places / areas depending on the level of</p>

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		<p>referring to places and areas. If this is to be effective it needs to acknowledge buildings too, otherwise it is a significant gap.</p> <p>- There is no mention of the Barossa Valley and McLaren Vale Character Preservation Districts and their function.</p>	<p>significance – whether local or state and whether Aboriginal or European.</p> <p>- The inter-relationship with tourism is ignored.</p> <p>The SPP should refer to the importance of a relationship between DPTI and Department for Premier and Cabinet – Aboriginal Affairs and Reconciliation to better connect the development application process with awareness of the location of registered Aboriginal sites.</p> <p>The Native Title Act should be added to the list of related legislation.</p>
			<p>There is a missed opportunity to link this policy with Policy 3 - Adaptive reuse, given the obvious synergies.</p>
<p>SPP 8: PRIMARY INDUSTRY</p>	<p>- The Policy is generally sound in recognising the importance of primary industry to the State's economy and prosperity and the relationship of associated activities such as tourism and service for the State.</p>	<p>8.4 – <i>"Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas."</i> 'Equitably' will need to be defined as this can be very subjective without a suitable reference point.</p>	<p>- The policy should address the need to manage the tension between protection of the Watershed and enabling primary production; and conservation objectives and primary production. These tensions are currently controlled by blunt tools. There is a need to consider performance</p>

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		<p>- The Policy does not call up the need for cooperation between government agencies and the various relevant legislation that cuts across primary production, especially in sensitive locations such as the Watershed, Character Preservation Districts and EFPAs. Policy conflict resolution is needed to ensure planning objectives are deliverable.</p>	<p>measures to provide more flexibility for primary industry particularly in the context of diversification and value adding (for example, utilisation of waste and stormwater performance measures rather than land use or floor area or other numerical prohibitions).</p> <p>- The Policy does not acknowledge the Character Preservation Districts or the EFPAs. Given each of these tools are critical in securing these regions for primary production (amongst other things) perhaps these should be referenced.</p>
<p>SPP 9: EMPLOYMENT LANDS</p>	<p>Policies</p> <p><i>9.3 - Support and promote adaptable policies that allow employment markets to evolve in response to changing business and community needs.</i></p> <p>This policy could be expanded to encourage development of vacant and underutilised land within existing centre and dis-incentivise land banking. The policy could also reference support for redevelopment of brownfield sites.</p>	<p>Policies</p> <p><i>9.6 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> <p>The SPP is very focused on Employment Lands (acknowledging this is the title). Perhaps this policy needs to be expanded so it is not just focused on lands but also economic activity, for example 9.3, 9.4 and 9.7.</p> <p>9.8 – With the focus on Adelaide City – it appears that the</p>	<p>9.4 – The Code will need to include zoning flexibility for land uses that are currently undefined.</p> <p>9.6 - Flexibility / adaptability – there needs to be careful application of this flexibility – we have invested substantial amounts into centres (such as Noarlunga, Aldinga and Seaford) and allowing out-of-centre development risks losing intensity at these centres when some are already struggling. A balance between retail demand and supply needs to be achieved as too much new 'retail land' can lead</p>

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		<p>opportunity to increase the role of regional cities has been overlooked. Including a focus on regional centres and cities is considered desirable to assist with increasing employment close to people's place of residence, especially in outer lying metropolitan areas.</p>	<p>to a decline in existing centres or even under performance across new and existing, which is undesirable in view of the increase in competition from online retailers. It is recommended that this policy acknowledge the need for retail land supply to be informed by qualified retail economic planning.</p> <p><i>9.9 – Encourage the development of vibrant employment and residential mixed-use precincts where conflicts between uses can be managed.</i></p> <p>This will require careful consideration of land use mix.</p> <ul style="list-style-type: none"> - Working from home is not discussed. - There appears to be a policy gap in this context in relation to connectivity to information technology infrastructure (for example Gig City, Smart City etc).
<p>SPP 10: KEY RESOURCES</p>		<p><i>10.2 – Plan for and implement development in the vicinity of undeveloped energy resources, energy resources operations and associated infrastructure to ensure their ongoing safe and efficient operation.</i></p>	<p>The term 'key resources' should be better defined.</p>

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		This policy is not clear. What type of development is 'in the vicinity'? Is this policy concerned with appropriate buffers, which is what is alluded to under the Non-Statutory Guidance Notes?	
SPP 11: STRATEGIC TRANSPORT INFRASTRUCTURE	<p>11.3 – <i>Enable equitable distribution towards the provision of transport infrastructure and services to support land and property development.</i></p> <p>This policy is critical and highlights the need to firm up infrastructure planning and contribution scheme networks to enable effect to be given to this policy.</p> <p>11.7 – this policy is supported, but careful planning is necessary to ensure no spatial conflict arises with the strategic policy of increasing residential densities around transport corridors (the dichotomy of 'link' versus 'place').</p> <p>11.10 – This will be increasingly important, and it will be interesting to see how this may look.</p>		<p>-There is limited policy definition (only a transport focus). Where does other infrastructure fit, such as communications?</p> <p>- Suggest the inclusion of a policy that encourages planning for co-location of cycling facilities along strategic transport corridors.</p>
SPP 12: ENERGY		12.5 – How can Planning Instruments ensure 'stable energy market and continued supply...?' Perhaps replace 'ensure' with	

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SPP 13: COASTAL ENVIRONMENT		'facilitate'.	<p>Should this policy title also include river systems and waterways or is a further SPP being drafted to address this?</p> <p>Policy 13 should refer to the cultural heritage of these environments.</p> <p>Suggested wording for Objective: '...that development is not adversely affected by...'</p> <p>13.1 – Need to clarify if this is referring to all development, existing or new.</p> <p>13.3 – This could also refer to estuaries and marine protection areas.</p> <p>13.4 – Suggest rewording: After 'mitigation strategies are in place' insert 'or are capable of being'...</p> <p>After 'projected sea level rise and' insert 'options for'...</p> <p>13.5 - The term 'facilitate' could imply that the policy should streamline development on coastal sites. A change of wording is suggested to focus this policy toward sustainability; for example eEnsure development that requires</p>

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			<p>a coastal site is sustainable and that environmental impacts are managed or mitigated'.</p> <p>13.8 - After 'impacts on the coast will be minimal' insert 'and managed'.</p> <p>Is state policy able to include a section to identify areas where a natural coastal landscape is desirable to be protected and others where a human/built coastal landscape is suitable?</p> <p>The SPP should refer to the Aboriginal cultural heritage aspects of coastal environments.</p> <p>Notably a 'Creeks and Waterways' (or similar) SPP is not in the suite. These areas are also of elevated importance in relation to Aboriginal cultural heritage.</p>
<p>SPP 14: WATER SECURITY AND QUALITY</p>	<p>Agree with the content of the Non-statutory Guidance Notes:</p> <p>Regional Plans to identify areas of growth and location of future development and associated short and long-term infrastructure requirements. Regional catchments to be identified to understand up and down stream impacts. Need for the above to be identified and</p>		<p>SPP 14 should include reference to 'Green Infrastructure' and WSUD, as key principles to build resilience into urban water systems, streets and places.</p> <p>SPPs 14.3 and 14.4 – The policy should be amended to ensure these elements are identified and considered in a strategic manner and on a regional basis. Such</p>

Policy	What we like	What we don't like	Additional comments
	<p>mapped.</p> <p>The Code to implement state policy via an overlay to ensure development mitigates adverse impacts on water supply. Also promotion of WSUD and effective stormwater management.</p>		<p>infrastructure needs to be identified, planned for and costed. Following this it is suggested that contribution schemes are prepared in order that cost sharing to fund provision (or upgrade) of infrastructure may be apportioned. It is considered critical for funding mechanisms to be in place to support the extension of SA Water/other waste water infrastructure to protect water quality in the Mt Lofty Ranges Watershed. Resolution of this issue will facilitate business and tourism, and development in areas of high productive capacity and amenity.</p>
<p>SPP 15: NATURAL HAZARDS</p>	<ul style="list-style-type: none"> - Identifying climate change as a factor in the likely increase of extreme weather events such as extreme heat, storm events and flooding. - Acknowledgement that planning plays a key role in mitigating risks from natural hazards. In this regard the policy identifies risks and potential strategies to mitigate these. 	<ul style="list-style-type: none"> - More detail is needed in relation to bushfire risk, in particular the importance of the location of development to minimise bushfire risk and impacts upon the natural character to provide buffers. 	<p>1.5 - Are there any rivers (such as Murray, Torrens, and Onkaparinga) that should be considered in a 'protect' context too?</p> <ul style="list-style-type: none"> - Significant work is required to identify and quantify risks and then spatially represent these risks. Is this a key task with each regional plan?
<p>SPP 16: EMISSIONS AND HAZARDOUS ACITIVITIES</p>			<p>16.1 - Rewording to separate issues of 'appropriate zoning' and</p>

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Policy	What we like	What we don't like	Additional comments
			<p>'compatible mixed use' as the wording is confusing. Suggest: 'Ensure zoning is appropriate and that mixed uses are compatible'.</p> <p>It is considered that there should be a policy trigger requiring appropriate land contamination investigations to be undertaken prior to land being rezoned for residential or other sensitive uses.</p>