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To

Mr Tim Anderson QC
Planning Commissioner
State Planning Commissioner
GPO Box 1815
Adelaide SA 5001.

State Planning Policies – Submission on Draft, September 2018 in the respect of the Barossa Gawler Light Adelaide Plains region .

Submission Summary: The new State Planning Policy (SPP) principles highlight key considerations including an emphasis on Design to support good policy. Our submission is, however, that the principles are expressed too generally to effect sound policy directives and do not provide the contextual guidance required for the best outcomes for this region. Peri-urban growth is uniformly high in Australia, and this region is growing exponentially faster than the state average population. Sound planning that facilitates innovative and economically viable agriculture along with a credible and functional built environment are of the highest priority to ensure that the region grows in a manner that sustains vibrant and innovative communities with high performing agricultural and tourism based economies. This is not only important for this region, which includes Australia's most famous wine region, but critical for Adelaide as well so that the peri urban agricultural lands contribute to and reinforce the vibrancy of Adelaide, not sprawl and economic irrelevance as the city's forgotten fringe. There is an overwhelming lean in the Policy consultation document to design themes in Adelaide, whereas the demand for design driven planning and development is universal. There is a need for linking the various policies as in reality this is a matrix of policies, not silos of policy.



An Australian Government Initiative



General Comments:

1. Innovation is a process of discovery, design and implementation. Planning innovation should be science and research informed, design led and visionary in implementation.
2. Attracting population is not a simple proposition. We want to attract the population we need to grow our economy. A skilled and creative population demands a quality of life commensurate with their expectations of sustainable environments, design led built form and spaces and places for community. The planning policies should encourage this and not leave it to chance.
3. The built environment is tomorrow's heritage and today's legacy and warrants consideration: good design does not have to be expensive, but it does need to be influenced by good policy (Lee 2010). Design, planning and development, in that order, should be the aspiration.
4. The planning policies need to recognise that place based initiatives are best and whilst support and assistance with complex applications for development may be required by local authorities, local authorities should not be excluded from the planning process as this is where the vision, strategy and risk impacts that inform development approvals is based.
5. Design Advisory Panels for each planning region being composed of design professionals with an understanding of that region's cultural and economic capital and community vernacular could provide independent advice to both developers and local government planning staff as to the design implications and strategic fit of a particular development which advice becomes a relevant consideration in an approval decision making process.
6. Principles of function, form and sustainability should headline planning policies as these principles are necessary to inform regional plans, codes and ultimate outcomes. Design based principles will be informed by changing demographics and needs for accessibility and liveability of all growth sectors: youth, families and the aged.
7. In regions like the Barossa, an international tourism destination, the principles of aesthetics, liveability and integrity are critical to economic performance.
8. Moderate densities, eg row housing or 2 – 3 story dwellings clustered around the main street precinct, can bring back vibrancy and consumer demand for town and neighbourhood precincts
9. Attractive built environments, supported by transport and broadband links, will be the biggest drivers of decentralisation and growth in regional communities.
10. Design based principles can deliver economic benefits where other planning policies, including adaptive use of agricultural lands provided that use is related to the dominant purpose of agriculture, are workable and facilitating.

Targets:

1. Percentage targets do not generally reflect qualitative outcomes. They offer a goal, but is it the right goal?
2. The real KPI for the policies is whether they are influencing change to better designed and built environments in line with vision and aspirations.
3. Transport options target should have a regional element – and an active transport target.
4. Part of that regional target will be achieved by a rich walking/cycling trails network which can deliver tourism revenues also.
5. Walkable neighbourhoods need to be stimulated, created, to motivate people to walk and this should be a regional aspiration also.
6. Liveable green environments enhance regional townships also.
7. Housing choice should include medium density options that have an aesthetic fit with streetscapes (not a simple percentage target)
8. The targets and policies need to have a clear purpose.

Policies:

The planning principles are for the most part the right ones, although expressed in what might be described as general or “motherhood” statements which dilute the impact of the principles. A lack of action words to enforce a commitment to real outcomes. The submission is that a change in policy 1 from Integrated Planning to Integrated Design would facilitate a better approach. Beyond that, each of the Objectives of the Policies below have been edited to reflect recommendations of this submission.

Policy 1 Integrated Design (In the discussion paper characterised as Integrated Planning)–
“Integrated design is an essential approach for liveability, growth and economic development, and enhanced form, function and efficiency, maximising the benefits and positive long-term impacts of development and infrastructure investment. Apply principles of integrated design for balance and optimal outcomes for land use, transport, environment and infrastructure planning.”

South Australia is in a strong position to offer a leading exemplar in integrated design in its planning framework having already invested in better and relevant Integrated Design Strategies through Thinker in Residence Laura Lee in 2010. The initiatives that followed including the Integrated Design Commission, the State Architect and Design Review Panels set the state up well to be a global leader in design led planning. This advantage should be leveraged in this process and the work of Laura Lee and the institutions set up following this period should be embraced to deliver design based systems. Design is a verb, it is what you do: Efficiency and Function are key outcomes of good design processes. It seems that the approach in this section of the consultation paper is very top down, rather than a co-design philosophy which would be consistent with integrated design practice.

Liveability and life cycle affordability are real considerations and if these are not reflected in design principles they cannot be implied in regional plans and design codes. The policies of “encourage”, “promote”, “is considered” are too soft and non directive – there is no imperative for design based outcomes. Design is too important to be optional.

Policies should recognise the character preservation designation (CPD) and establish principles to inform regional plans and design code. As industry and community get to understand CPD and EFPA’s, the language and intent of these two schemes needs to be clear in the SPPs to avoid confusion between policies tiers and other legislation. As an example, Policy 6- sub Policy 3 on page 36 is a clear conflict with CPD and EFPA’s.

Policy 2 Design Quality - *“Ensure that the universal application of best practice design principles to buildings and places to promote useability, liveability, access and affordability”.*

Good design in our places, spaces and built environment is critical to adaptive use and reuse, cost efficiencies in service delivery and lowering the cost of utilities over the lifecycle of the buildings. Spaces for people and connectivity support entrepreneurial and innovation ecosystems. Good design does not have to be expensive, but it does need to be accessible. Design codes and principles specific to the particular characteristics of the region, including but not limited to the Character Preservation areas, will enhance short and long term outcomes, including development outcomes, for the region. Regional design review panels could support government in meeting these objectives by providing advisory services to government and developers alike in respect of meeting best practice design aspirations in development proposals. As regional towns cities grow, design guidelines for new development which integrates the best of the existing townscape with new development is an essential tool for attracting investment with economic benefit.

Policy 3 Adaptive Reuse – *“Facilitate adaptive reuse of buildings and places through purposive planning principles and creative investigation and utilisation of space”*

The effectiveness of this policy will make or break the character of historic regional towns. Many of this region’s towns including Gawler, Kapunda, Angaston and Nuriootpa have recognised heritage assets that are underutilised owing to the challenge of conforming with current building codes upon change of use. The emphasis on Adelaide in application of this principle is misplaced.

Policy 4 Biodiversity – *“Champion Biodiversity and address planning in an holistic framing that requires minimal detriment to environmental assets.”*

Biodiversity outcomes need to be real. There are economic as well as environmental and social benefits to a biodiverse ecosystem.

Policy 5 Climate Change - *“Frame Planning and Design Code requirements for climate resilience, adaptive living and low emissions solutions.”*

Like sustainability, climate change considerations should be embedded in each Policy principle. For example, Walkable Communities, Design Quality, Key Resources, Strategic Transport Infrastructure Energy, Water Security and Quality, Natural Hazards, Coastal Environment and Primary Industry. The changing externalities, including weather, associated risks and costs and targets that reduce or lessen emissions will not be delivered by a separate Climate Change principle. So perhaps this principle should instead be expressed as above: “frame planning and design code requirements for climate resilience, adaptive living and low emissions solutions”

Policy 6 Housing Supply and Diversity – *“Design prioritises a diverse range of affordable and sustainable living housing in well serviced communities with relevant choice to meet communities’ needs”*

Vibrancy is encouraged by clustered population centres whether in city or country towns and a degree of medium density housing in, over and around high streets can create a market for cafes and services to remain open longer hours, profitably. Encouraging 2 – 3 story development in and around main streets where keeping with street character would assist country towns to be more relevant to their communities.

Affordable housing options can be increased by investing in sustainable design, mass produced, for more cost effective solutions that meet public policy needs for lower lifecycle costs. Favourable land development approvals outside vision led planning could provide unsustainable options if services are not available, and should not be a necessary element of a planning policy suite. There are a number of examples in this state and elsewhere where “low cost housing opportunity” is associated with the decommissioning of the state’s best farming land, with overall negative economic and social outcomes to the state.

Policy 7 Cultural Heritage: *Places of cultural, heritage and character significance and heritage areas are conserved and celebrated for the benefit of our present and future generations*

The design review panel framework could inform and support decisions on cultural heritage. More detail could be included to guide what the desired outcome of “cultural heritage” policy should be. It should acknowledge the shaping of South Australia and its economic geography as a result of systematic colonisation which made South Australia’s development different from other States. This structure of early settlement and development was

instrumental to the urban form and modified rural landscapes that are now central to cultural heritage and our sense of place.

Policy 8 Primary Industry: - *Prioritise a diverse and dynamic primary industry sector with adaptive value adding permissions, prioritised infrastructure and assets of highest value protected from encroachment by incompatible development. Shared responsibility and agricultural primacy inform urban rural coexistence.*

Primary industries offer long term – maybe even eternal – income and exports for this state. Planning policies for primary production need to prioritise farming and related pursuits on priority farming land and support these enterprises with facilitative frameworks for non-invasive value adding on or adjacent to the farm. Sorting, packing, packaging, farmgate sales, agri-tourism associated with the dominant activity on the land being primary production would add value to the agricultural economy without detracting from it. It could facilitate secondary industries such as suppliers and services and tourism. Associated regulatory frameworks would also need to be addressed: eg currently, to process on land (winery on vineyard) where a small pocket of a large farm is turned to processing can result in the whole farm being re assessed for rates on the production (higher rating) basis, reducing viability of the farm. This discourages value adding, jobs and exports. Whilst detail may end up in the Regional Plans and Guidelines, this facilitation needs to be anticipated in the policy statements that govern.

In addition, there is a case for Grandfather rights where zoning is changed to enable productive primary production to continue. Canada, in particular British Columbia, has undertaken some effective work on agriculture/urban interface, establishing a shared responsibility framework where farming predates the adjacent urban development. The obligation on the farmer is to undertake best practice farming which is peer adjudicated. The obligation on the developer and resident is to take the adjacent farming into account in the design and develop and maintain awareness and respect for the farming activity.

Page 21 of the Discussion paper notes: *RURAL AREAS: Very low density; Connected to primary industries and markets; Core facilities and transport located in established townships.* The first and last statement should not necessarily be the case. There should be a degree of medium density in town centres and transport nodes (transport depots and wineries) are unlikely to be within towns especially when it comes to B-double and Road Trains.

Policy 9 Employment Lands: *Employment lands are relevantly located close to labour and industries they serve, with prioritised infrastructure and transport systems and protected from encroachment by incompatible development.*

Whilst design led planning should deliver this result, relevance and context are key to employment lands, as is access to transport systems for journey to work.

Policy 10 (a) Key Resources–Natural *Key resources are scarce and must be maintained at sustainable levels if they are to continue to contribute to our state’s economy and provide valued employment opportunities*

Fragile natural resources need to be front of mind in design, planning and development to ensure they are not collateral damage to great aspirations.

Policy 10(b) Key Resources – Mineral *Mineral resources are an important contributor to the state’s economy and provide valued employment opportunities. Encroachment by and on mineral resources and conflict with other economic activities should be anticipated and fairly managed in land use planning.*

This policy talks about protecting key resources from encroachment but doesn’t recognise the reverse of resources sector encroachment on primary production land or impact of new resource access on existing towns. This goes to the heart of the right to farm movement. Resources to generate revenues and modest employment outcomes, but they are infrastructure intensive and subject to global market conditions more than other commodities and therefore need not to diminish or devalue conflicting activities on the land.

Policy 11 Strategic Transport Infrastructure *Land development policies are integrated with existing and future transport infrastructure services and functions to prioritise the safe, efficient and reliable connectivity for people and goods. Intermodal functionality maximises transport options.*

This region is advantaged by strategic transport infrastructure including the Sturt Highway, the Northern Expressway/Northern Connector with connections to the Port Expressway and North South Corridor. With global industries and access to such major routes, the first mile/last mile gaps are barriers to maximising use of this infrastructure and maximising exports from regional industries. Judicious land use planning and strategic infrastructure investment can prioritise these first mile last mile gaps and intermodal opportunities to optimise industry and government outcomes.

Infrastructure corridors (such as old rail corridors) or nodes should be identified to ensure encroachment or incompatible uses don’t preclude or complicate future activity of sites/nodes/corridors. This may incorporate future regional airstrips, multimodal transport, transport inter-models etc. This needs more weight in the policy as connectivity is a driver (or a barrier if insufficient) to economy and social capital.

Policy 12 Energy *Planning policies support the ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business.*

Whilst there have been pockets of discontent about renewables, regional Australia is overwhelmingly turning to energy independence or partial independence where the case stacks up. Heavy industry and high energy users needs are currently met by mainstream energy distribution and so planning for employment lands and other intensive industry will require considerations of energy availability and site and locations near energy availability.

Policy 13 Coastal Environment: *Protect and enhance the resilience of the coastal environment and ensure that development does not cause detriment to or expose coastal areas to debilitation. Ensure that climate change impacts on coastal environments and sea levels are factored in to planning frameworks and design codes.*

Where is the climate change reference in this most exposed of contexts? The coastal areas, like peri urban landscapes and primary production lands have special needs and require a tailored approach to design, planning and development which facilitates people's enjoyment of coastal areas subject to limitations necessary to ensure resilience and sustainability of the coastal environment and the minimisation of risks to the development.

Policy 14 Water Security and Quality- *South Australia's water supply is protected from the adverse impacts of development and wastage and augmented by judicious use of water sensitive urban design and sustainable stormwater capture and reuse.*

Maximising multiple use and reuse from multiple sources at the design and planning phase may be key to sustainable water in South Australia. Fit for purpose water can only be delivered if the design and planning is compatible. Water treatment and delivery are expensive. Appropriate levels of treatment for relevant uses is possible with an integrated design and planning approach. Water allocation planning should be recognised as one of the mechanisms, but not the only mechanism for water security and quality.

Policy 15 Natural Hazards – *Risk of natural hazards are well understood at the design phase and the risks of impacts from natural hazards are minimised for people and property. Spatial planning provides for extreme heat, fire and flood refuges.*

Increased risk of natural hazards is an incidence and a feature of a changing climate and governments have a responsibility to plan and provide for extreme hazards including "safe refuges" from natural disasters.

Policy 16 Emissions and Hazardous Activities – *Short and long term risks of emissions and hazardous activities are identified early in the design phase and site selection guidelines maintain safe and protected environments for people and place.*

Again, design led planning and development puts a different focus on this principle and to the extent that hazardous risks are identified, physical location or zonings agglomerations of potentially hazardous activities are appropriate to the risk and surrounding people and built and natural assets.

Conclusion:

A challenge for the SPPs is that the policies effect is a matrix of considerations for planning yet a policy hierarchy or system that is simple and streamlined assists strategic and assessment processes. State Planning Policies that collectively, not linearly, inform Regional Plans will then inform the role of the Design Code as a suite that governs assessment. In this context, the role of policy in regional plans is something that regions are deeply concerned with and focus on. For regional policy to create/supplement value for State Planning Policies, a **co-design** process needs to be invoked where local cultural, social, environmental and economic context - and aspirations – shape these regional plans and design codes. The potential for conflict that will arise if co-design can not be achieved is recognised on Page 11– *“In some circumstances the SPPs may compete or even be in conflict. To resolve these, specific regional and local circumstances need to be considered.”* This acceptance that there will be confusion and ‘need to be considered’ doesn’t inspire confidence in the Policy System and this submission urges rapid progress on a co-design model. Otherwise the new system may falter before it begins.

SPPs consultation would usefully be extended, or refreshed, during a period when the atlas is available so that public and stakeholder commentators can see how the overlays work in practice. Some minor amendments to the summary principles of Good Planning to inform the Planning system might better position intent.

Ultimately , this is a once in an era opportunity for South Australia to creatively develop a highly effective, innovative and purpose and outcomes driven planning system based on high level principles of substance, co-design at a regional level and sensible codes and assessments that recognise contextual differences with design led solutions.



Anne Moroney, CEO.

September 2018.