

T2D TORRENS TO DARLINGTON

Engagement Plan

Tunnel Protection Overlay Code Amendment

August 2023



Government of South Australia

Department for Infrastructure
and Transport

1. Background

The Australian and South Australian governments are delivering the most significant infrastructure project ever undertaken in South Australia, the 10.5km River Torrens to Darlington (T2D) Project. Two sets of tunnels will be built in the north (Richmond to Torrensville) and south (Clovelly Park to Glandore) with an open motorway connecting them. When complete, more than 50% of the T2D motorway will be underground tunnels.

The Department for Infrastructure and Transport (the Department) has identified a number of measures to protect the tunnels. One of these is the introduction of new planning policies through a Code Amendment. The use of planning systems to protect major transport tunnels is common throughout Australia and is considered national best practice.

On 10 January 2022, the Minister for Planning and Local Government, at the time, approved the initiation of a Code Amendment by the Department. Following consideration of the Code Amendment, on 28 July 2023 the Minister for Planning approved the Tunnel Protection Overlay Code Amendment for early commencement, pursuant to section 78(1) of the *Planning, Development and Infrastructure Act 2016*. The amendment:

- introduces a Tunnel Protection Overlay to the Planning and Design Code (the Code); and
- applies the Tunnel Protection Overlay to land in the vicinity of the proposed tunnels to be constructed as part of the T2D Project.

2. Purpose

The purpose of the engagement process is to ensure that individuals, businesses, organisations and communities interested in and / or affected by the proposed Code Amendment are able to provide feedback and influence particular elements of the proposed Tunnel Protection Overlay Code Amendment.

Specifically, the engagement will:

- communicate and raise awareness that a Code Amendment is on consultation for a period of 8 weeks commencing on 31 August 2023;
- provide information about what is proposed by the Code Amendment including the location of where the proposed changes will apply;
- allow community and stakeholders to understand the future implications that the proposed Code Amendment may facilitate, and any impacts this may have on them;
- enable stakeholders and community to provide feedback on the Code Amendment;
- close the loop with stakeholders and community to inform them of the outcomes of the engagement process, and how they can access the final version of the Code Amendment; and
- meet statutory requirements as they relate to engagement on a Code Amendment.

3. Engagement approach

This Engagement Plan is aligned to the principles and policies of the Community Engagement Charter (as detailed at Section 9) as well as the International Association of Public Participation (IAP2) Spectrum of public participation which is widely used by all levels of government. Based on this spectrum, the following levels of engagement are planned:

- **Inform** – to provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions; and
- **Consult** – to obtain public feedback on analysis, alternatives and/or decisions.

The planned stages of engagement are outlined below:

Stage 1: To raise awareness about the Code Amendment and the potential impacts of the proposed policy changes on development in the affected area (inform).

To seek input from landholders and other stakeholders to inform the amendment (consult).

Stage 2: To seek input into the evaluation of the engagement process (evaluate).

Stage 3: To 'close the loop' and provide information on the Code Amendment based on the findings of the engagement and how the feedback received has informed the interim Code Amendment (inform).

Due to the nature of the proposed Code Amendment, there are some aspects which can be influenced by stakeholder and community feedback and other aspects that are excluded from this consultation process.

4. Scope of Influence

Aspects which stakeholders and the community can influence are:

Providing information on the potential impact of the proposed new planning policies on current and future property owners and developers.

Aspects which stakeholders and the community cannot influence are:

- The initiation of a Code Amendment which seeks to introduce a Tunnel Protection Overlay into the Planning and Design Code and apply it to the proposed Torrens to Darlington tunnels.
- The extent of the subject land that forms the basis of the Code Amendment.
- The engineering principles underpinning the triggers for referral to the Commissioner of Highways.

5. Previous Engagement

The Department has worked closely with Planning and Land Use Services (PLUS) regarding the Code Amendment and presented to the State Planning Commission. An early briefing has been provided to administrators at the City of West Torrens, City of Marion, City of Mitcham, City of Unley and City of Charles Sturt in conjunction with ongoing engagement relating to the broader T2D Project.

There has been no previous community engagement specifically relating to this Code Amendment, however, extensive engagement has been undertaken more broadly on the T2D Project.

6. Key Messages

The following key messages will underpin the engagement regarding the Code Amendment. Additional key messages will be created for specific stakeholder communication collateral as required.

- The State Government is introducing new planning policies to protect the underground corridor required for the construction and ongoing operation of the T2D tunnels.
- Planning policies are the rules which councils and other planning authorities use to assess applications for development, such as a proposed new building, and are set out in South Australia's Planning and Design Code (the Code). To introduce the new planning policies, it is necessary to amend the Code through a process called a Code Amendment.
- The Tunnel Protection Overlay Code Amendment will introduce planning policies to a specified area around where the tunnels will be built – as shown in the Code Amendment document on the PlanSA website.
- For the most part, the area affected by the new planning policies is located directly above the tunnels and up to approximately 50 metres either side of the outer edges of the tunnels. The exception to this is in relation to the northern tunnels, where the planning policies will apply to a minimum of 80 metres to the west to provide for potential changes to the underground alignment of the northern tunnels from the Reference Design.

- The width of the areas affected is based on engineering requirements and reflects the depth of the tunnels – the closer the tunnels are to the surface, the narrower the affected area. Diagrams of the area are available in the Code Amendment document.
- The planning policies aim to ensure that from the early stages of project design and construction that development activity is designed and undertaken to:
 - prevent obstruction of the tunnel corridor, such as through deep footings or basements; and
 - avoid an excessive increase or decrease in weight or stress, such as buildings higher than 3 storeys or excavation greater than 2.5 metres below ground, in the vicinity of the tunnel corridor as this could result in damage to the structure of the tunnels.
- The planning policies do not change what can be built in existing zones; the assessment pathway for certain types of development will change to ensure that potential impacts on the tunnels are considered in their design.
- The planning policies will require applications for development that exceed the following thresholds to be referred to the Commissioner for Highways for review and advice on design requirements to prevent adverse impacts on the tunnels:
 - a new building (or alteration of or extension to an existing building) or temporary structure exceeding 3 building levels;
 - involving excavation or ground intrusion at a depth exceeding 2.5 metres, such as footings, underground car parks, cellars, pipes or drains;
 - fill or earthworks that build up the ground level by more than one metre; or
 - storage of material or equipment or temporary stockpiling over a designated stockpiling or storage area exceeding 100 square metres.
- The referral thresholds are based on engineering design parameters and existing ground conditions.
- Following construction of the tunnels, the planning policies will be updated to reflect the actual depth of the tunnels.

7. Engagement Activities

Our approach aims to provide convenient and easily accessible ways that stakeholders and the community can be informed about the project and provide their feedback. The consultation period will run for 8 weeks.

The specific ways that we will inform stakeholders of the Code Amendment, and the ways we will receive their feedback is specified below. Importantly, the approach is bespoke for each stakeholder/group to ensure it is convenient and accessible for them.

The ways that we will do this include:

- **Fact sheets** – our fact sheets are designed to explain what a Code Amendment is, and why it is relevant to stakeholders in plain English. They attempt to remove jargon and clearly explain the potential future impacts of the Code Amendment, so that stakeholders are well informed.
- **Face-to-face or online meetings by request** – providing an opportunity for face-to-face discussion is important. We offer the option of face-to-face (or online) meetings by request, so that they can be offered at a time that is convenient to the stakeholder.
- **Webpage on the Plan SA Portal** – the Plan SA portal will be used as the ‘one-stop shop’ webpage for all engagement collateral and information on the multiple ways we will accept feedback.
- **Submission form/online survey** – the online survey orientates feedback specifically to the elements of the Code Amendment that can be influenced. This ensures that feedback is more useful and targeted in consideration of the Code Amendment and any changes that may need to be considered. It also allows for some evaluation questions to be posed – increasing the chance of participation in the evaluation. Experience shows that lower participation rates can be expected from follow up evaluation surveys after the consultation.

- **Letters/Electronic Direct Mail** – letters will be sent to affected landowners, relevant state and local government agencies first nations authorities, utility providers, and industry peaks.
- **Drop-in community information sessions** – for community members to ask questions and provide feedback.
- **Phone and email enquiries** – planning and engagement staff are available to receive feedback or enquiries by phone and email throughout the consultation period through dedicated phone and email channels.
- **Multiple feedback points** – we will receive, count and report on feedback received in all ways, to reflect genuine engagement that is convenient to stakeholders. This includes phone conversations, meetings, emails, written submissions and survey forms.

8. Stakeholder Analysis

There are a range of key stakeholders identified who will have an interest in the Code Amendment. The engagement will be tailored to respond to each stakeholder's level of interest in the project, the extent to which they are impacted and the level of influence they could have on the successful delivery of the project.

Stakeholder	Level and Nature of Interest	Level of Engagement (inform, consult, involve, collaborate)	Engagement Tools
Minister for Planning, Hon Nick Champion	High The Minister for Planning will be the approval authority for the Code Amendment.	Inform	<ul style="list-style-type: none"> • Code Amendment Proposal to Initiate • Engagement Plan • Engagement Report • Code Amendment Report
Minister for Infrastructure and Transport, Hon Tom Koutsantonis	High The Minister for Infrastructure and Transport is responsible for management of State transport policy, assets and operations.		
State Planning Commission	High May upon request make recommendation to the Minister for Planning on whether to approve the Code.		
Owners and Occupiers in the affected area and adjacent the affected area	High Interest in change in policies and impacts on future development potential.	Consult	<ul style="list-style-type: none"> • Letters • Website • Fact Sheet • Council Briefings • Community Information Sessions
Affected Councils: <ul style="list-style-type: none"> • City of Marion • City of West Torrens • City of Mitcham Other Councils in the T2D project area:	High Interest in orderly development of land in its jurisdiction and interactions with their infrastructure.		

Stakeholder	Level and Nature of Interest	Level of Engagement (inform, consult, involve, collaborate)	Engagement Tools
<ul style="list-style-type: none"> • City of Unley • City of Charles Sturt 	<p>Interest in views of their constituents.</p> <p>Councils have been informed of the forthcoming Code Amendment.</p>		
<p>Utility providers:</p> <ul style="list-style-type: none"> • SA Power Networks • ElectraNet Pty Ltd • APA Group • SA Water • EPIC Energy • NBN and key telco providers 	<p>High</p> <p>Interest in change in policies and impacts on future utility infrastructure works.</p>	Consult	<ul style="list-style-type: none"> • Letters • Website • Fact Sheet • Utility / Industry / Agency Briefings
<p>Development and Planning Industry Groups:</p> <ul style="list-style-type: none"> • Property Council • Urban Development Institute of Australia • Housing Institute of Australia • Engineers Australia • Planning Institute of Australia (SA) 	<p>High</p> <p>Interest in change in policies and impacts on future development and building requirements.</p> <p>Understanding of new planning policies and building standards, including thresholds for referral.</p>		
<p>South Australian Government agencies</p>	<p>High</p> <p>Interest in change in policies and exemptions and impact on future Crown development activities.</p>		
<p>Broader community</p>	<p>Low</p> <p>Broader community may have interest in new policy that may be introduced in other parts of metropolitan Adelaide should tunnels be constructed in the future.</p> <p>May also be interested in development opportunities along South Road.</p>	Consult	<ul style="list-style-type: none"> • T2D Project Update distributed via letter box drop – refers to website for additional information

9. Alignment with the Community Engagement Charter and Measures of Success

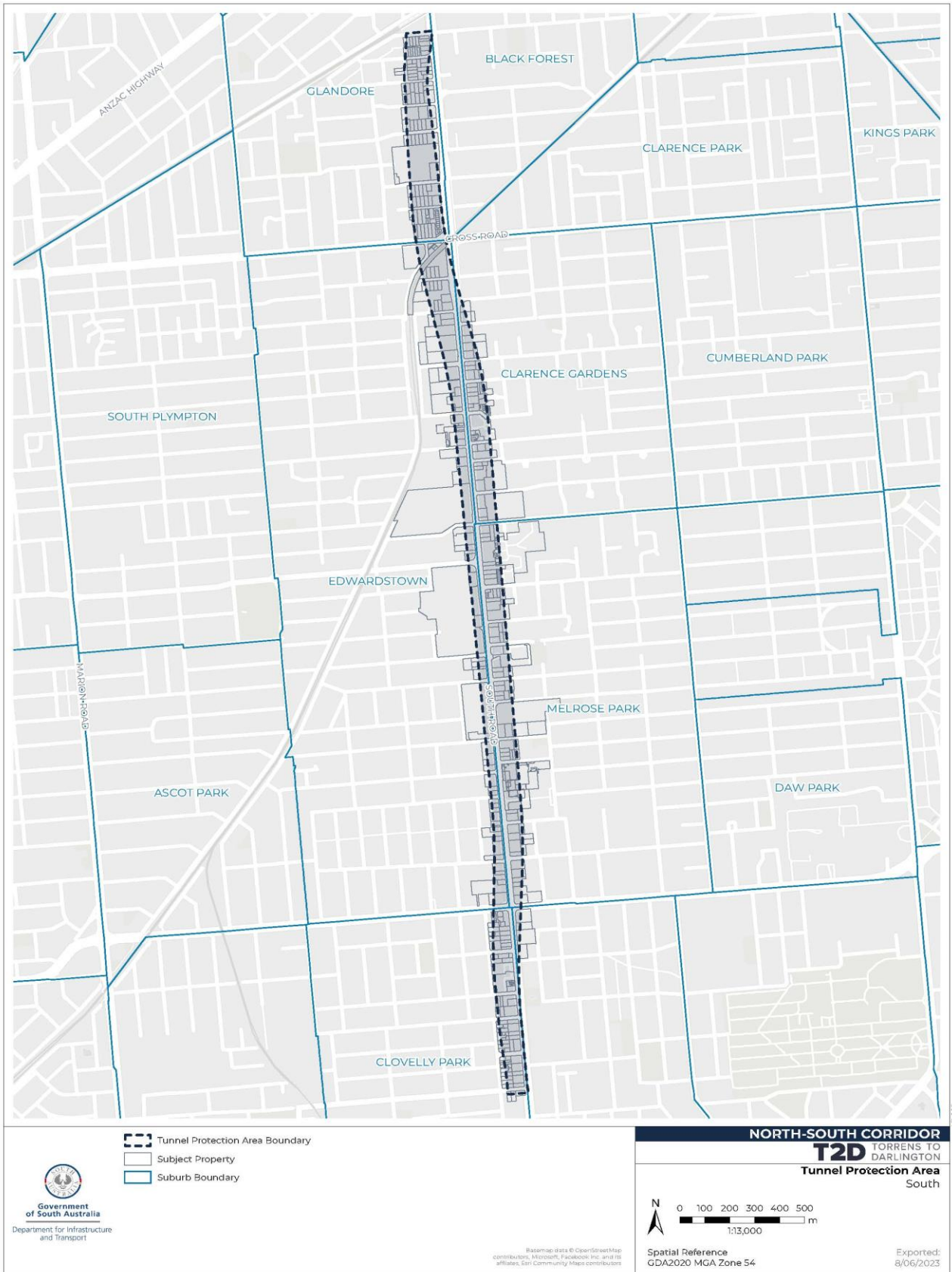
The Community Engagement Charter sets out best practice principles for community engagement in relation to the preparation and amendment of planning policies, strategies and schemes. The table below outlines the alignment of this engagement plan with the principles of the charter and how success will be measured. Further information on the evaluation of the engagement is provided at Section 11.

Charter Principle / Criteria	Performance Outcome	Engagement Measures	Evaluation Tool
1. Engagement is genuine	<p>People had confidence in the engagement process</p> <p>Engagement feedback was considered in development of the Code Amendment</p>	<p>Timeframe sufficient for people to understand the information provided and provide input through a range of channels.</p> <p>Provide opportunity for stakeholders and community feedback and issues to be considered in finalisation of the amendment.</p>	<p>Post-consultation survey of participants</p> <p>Review by engagement specialist</p>
2. Engagement is inclusive and respectful	<p>Affected and interested people had the opportunity to participate and be heard, regardless of background or status</p>	<p>Clear and concise information provided in language, channels and tools suitable to a range of stakeholders to ensure accessible and easy to understand.</p> <p>Provides a range of channels and forums to provide written and verbal submissions.</p>	<p>Post-consultation survey of participants</p>
3. Engagement is fit for purpose	<p>People were effectively engaged and satisfied with the process</p> <p>People were clear about the proposed changes and how it may affect them</p>	<p>Clear and concise information provided in language, channels and tools suitable to a range of stakeholders to ensure accessible and easy to understand.</p> <p>Timeframe sufficient for people to understand the information provided and provide input through a range of channels.</p>	<p>Post-consultation survey of participants</p>

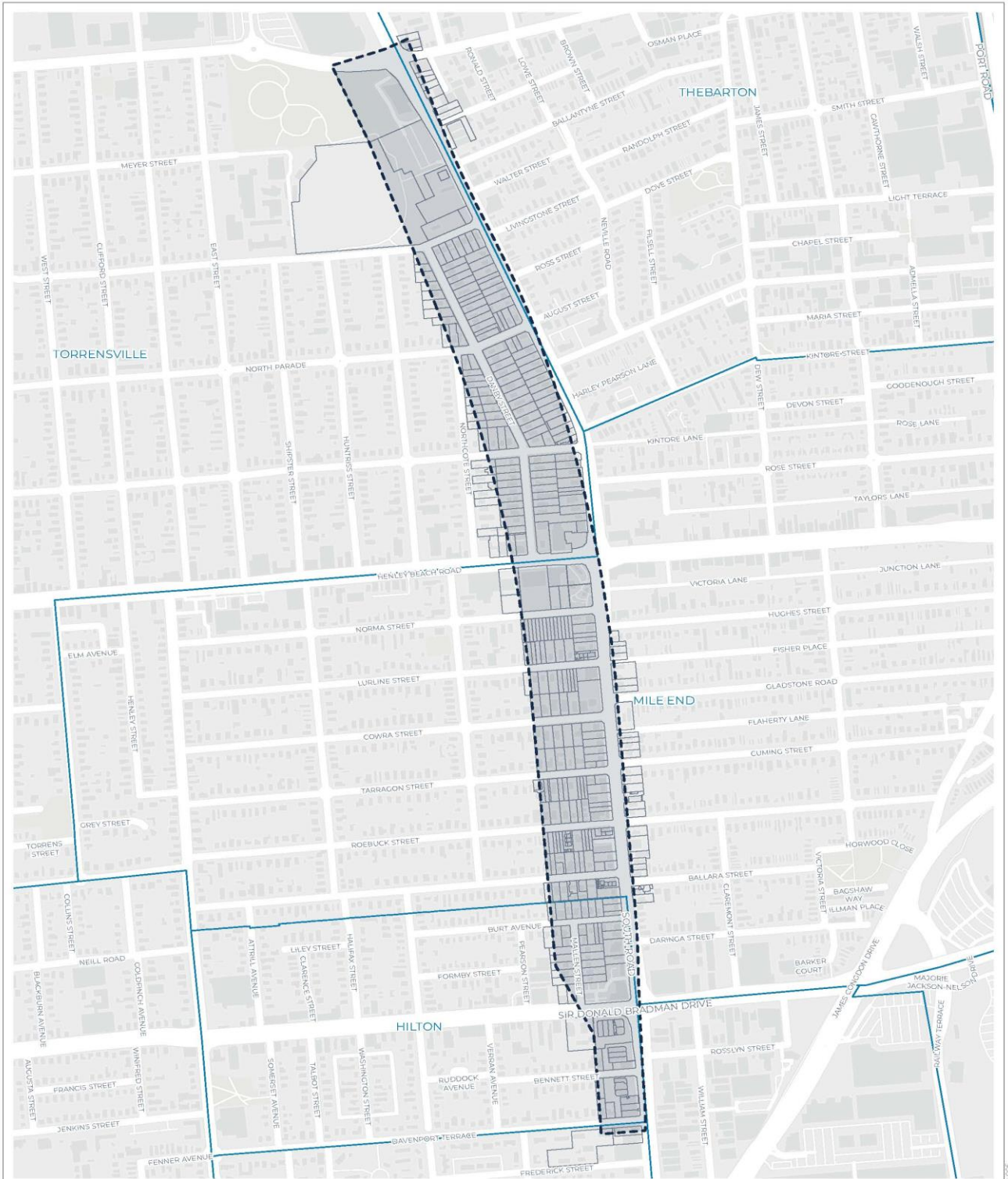
Charter Principle / Criteria	Performance Outcome	Engagement Measures	Evaluation Tool
<p>4. Engagement is informed and transparent</p>	<p>All relevant information was made available, and people could access it</p> <p>People understood how their views were considered, the reasons for the outcomes and the final decision</p> <p>Engagement included 'closing the loop' activities such as providing feedback to participants about the outcome</p>	<p>Consultation materials clearly set out the purpose of the consultation, what we are gathering feedback on, how participants can get involved and how feedback will be used.</p> <p>Submissions to be acknowledged and advised of next steps in the process.</p> <p>An engagement report to be prepared and provided to participants setting out the feedback received, how feedback was considered in finalisation of the amendment and the final decision.</p>	<p>Post-consultation survey of participants</p>
<p>5. Engagement processes are reviewed and improved</p>	<p>The engagement was reviewed and improvements recommended</p>	<p>Measures of success are identified and will be evaluated at conclusion of the engagement.</p> <p>Issues raised about the engagement during the process will be considered and action will be taken if appropriate.</p>	<p>Findings of the evaluation of the engagement are reported in the Engagement Report</p>




10. Map of Affected Properties

Southern




Northern




-  Tunnel Protection Area Boundary
-  Subject Property
-  Suburb Boundary



NORTH-SOUTH CORRIDOR
T2D TORRENS TO DARLINGTON
Tunnel Protection Area
 North





1:6,500

Spatial Reference: GDA2020 MGA Zone 54 Exported: 8/06/2023

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11. Evaluation of the Engagement

All participants will receive an invitation (via letter or email) to complete an online survey and provide an assessment of the success of the engagement against Charter Principles one to four.

The project manager and engagement specialists from the T2D Communications and Engagement Team will also assess the success of the engagement against the criteria.

Outcomes of the assessment will be included in the Engagement Report which will be provided to the Minister for Planning and published on the PlanSA website.

Charter Principle / Criteria	Charter Performance Outcome	Respondent	Indicator	Evaluation Survey
1. Engagement is genuine	People had confidence in the engagement process	Community & Stakeholders	I feel the engagement genuinely sought my input to help shape the proposal.	Post-consultation survey of participants Likert scale – strongly disagree to strongly agree
	Engagement feedback was considered in development of the Code Amendment	Project Manager / Engagement Specialist	Engagement contributed to the substance of the final amendment where possible	<ul style="list-style-type: none"> • In a significant way • In a moderate way • In a minor way • Not at all
2. Engagement is inclusive and respectful	Affected and interested people had the opportunity to participate and be heard, regardless of background or status	Community & Stakeholders	I am confident my views were heard during the engagement	Post-consultation survey of participants Likert scale – strongly disagree to strongly agree
		Project Manager / Engagement Specialist	The engagement reached those identified as community of interest in the stakeholder analysis	Representatives from most / some / little / no community groups participated in the engagement.
3. Engagement is fit for purpose	<p>People were effectively engaged and satisfied with the process</p> <p>People were clear about the proposed changes and how it may affect them</p>	Community & Stakeholders	<p>I was given sufficient information so that I could take an informed view</p> <p>Note: sufficient information includes whether the information was understood i.e. plain English, another language, visuals in addition to the extent of information</p> <p>I was given an adequate opportunity to be heard</p>	Post-consultation survey of participants Likert scale – strongly disagree to strongly agree
4. Engagement is informed	All relevant information was	Community & Stakeholders	I felt informed about why I was being	Post-consultation survey of participants

Charter Principle / Criteria	Charter Performance Outcome	Respondent	Indicator	Evaluation Survey
and transparent	made available, and people could access it People understood how their views were considered, the reasons for the outcomes and the final decision		asked for my view, and the way it would be considered.	Likert scale – strongly disagree to strongly agree
	Engagement included 'closing the loop' activities such as providing feedback to participants about the outcome	Project Manager / Engagement Specialist	Engagement provided to the community and stakeholders about outcomes of the engagement	<ul style="list-style-type: none"> Formally (report or public forum) Informally (closing summaries) No feedback provided
5. Engagement processes are reviewed and improved	The engagement was reviewed and improvements recommended	Project Manager / Engagement Specialist	Engagement was reviewed throughout the process and improvements put in place, or recommended for future engagement	<p>Reviewed and recommendations made.</p> <p>Reviewed but no system for making recommendations</p> <p>Not reviewed</p>
6. Charter is valued and useful	Engagement is facilitated and valued by planners	Project Manager / Engagement Specialist	<p>Identify key strength of the Charter and Guide</p> <p>Identify key challenge of the Charter and Guide</p>	General comments