

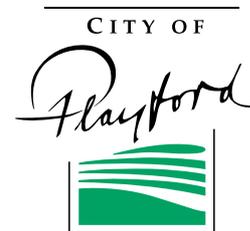
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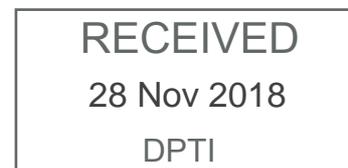
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27 November 2018



Planning Engagement  
Department of Planning Transport and Infrastructure  
PO Box 1815  
Adelaide 5001

Dear Sir/Madam,

**City of Playford Comments – Policy Discussion Papers: Integrated Movement Systems and Natural Resources and the Environment**

Thank you for the opportunity to comment on the two policy discussion papers released by the State Planning Commission (SPC). Comments are provided on both the Natural Resources and Environment Paper and the Integrated Movement Systems Paper under separate headings within this correspondence.

As a preliminary comment, both papers are clear and well expressed. The format enables relatively easy interpretation of the current position of the SPC regarding potential transition to the Planning and Design Code and possible sequencing of this process. The following comments are provided with a particular focus on the potential implications of a number of the policy responses for the City of Playford.

**Natural Resources and Environment Policy Discussion Paper**  
Green Infrastructure and Water Sensitive Design

The paper notes that Water Sensitive Urban Design (WSUD) and Green Infrastructure (GI) policies have been introduced into current Development Plans and are ready to be transitioned to the Code. The paper also notes the need to develop new 'standard solution' policies to be applied to relatively simple forms of development, such as 'deemed to satisfy' development. These proposals are supported.

It is noted that WSUD is easier to implement and maintain at a neighbourhood or district level and through land divisions of 20 or more allotments, where there is less reliance on individual properties. Playford will also be managing large areas of urban renewal where investigation regarding WSUD implementation would be appropriate and should include the use of infrastructure agreements rather than, or in combination with, allotment by allotment solutions. These agreements would need to be relatively easy to establish.

## Waste Management

The paper supports transition of existing waste management policies to the new Code with additional work required to establish new policies for waste management in higher density residential environments. These initiatives are supported.

The State should also consider establishing planning policies with regard to new and emerging technologies for managing waste such as high efficiency incineration, anaerobic digestion and energy from waste facilities.

## Water Security and Quality

The paper proposes undertaking work towards the reform of policies for water protection areas, which includes substantial portions of the eastern hills/rural areas in Playford. While general support is provided for the proposed initiatives to investigate issues with regard to current policies, particular comment is made and support provided regarding the need to enable additional opportunities for enterprises to establish while maintaining the protection of water quality. This is necessary to assist with ensuring ongoing economic sustainability of land holdings in these areas which often lack the economy of scale enabled by large scale farming enterprises. Such an initiative would help to facilitate efforts on the part of property owners in relation to environmental sustainability and property maintenance initiatives.

## Biodiversity

The proposed initiatives for biodiversity are generally supported as outlined in the paper. The paper raises a series of questions regarding biodiversity protection. This is a difficult issue for planning to easily deal with as many of the impacts are incremental and relatively small scale. For example it would be challenging to control back yard vegetation through the planning system.

Planning is best equipped to deal with biodiversity issues at a strategic planning level (for example through the 30 Year Plan) and when undertaking rezoning where significant areas can be designated to be retained separately from urban areas. There is also some potential at a land division stage to include sensitive areas for open space. It will also be important within compact living environments to ensure that adequate areas are set aside in road reserves to enable tree planting which can contribute to establishing canopy planting to ensure that the Government's strategic objectives are achieved.

Biodiversity retention is likely to also require use of alternate levers such as special provisions within legislation, whether that is the planning or alternate legislation. The significant tree legislation (located within the Planning Development and Infrastructure Act) is an example of such an intervention.

## **Integrated Movement Systems Discussion Paper**

### Aligning South Australia's growth with transport infrastructure

While the initiatives proposed to support increases in population density in close proximity to key transport corridors and centres are generally supported, it is noted that there are difficulties in applying the concept of minimum population thresholds to many parts of outer metropolitan Adelaide unless there is a strong commitment to the early provision of frequent public transport in new and existing urban areas. Public transport often follows many years later if at all. The market for new allotments also strongly favours larger allotments in some areas in particular, while noting that allotment sizes have gradually reduced over a number of years even in outer areas.

True integration requires State agencies and local government to work more closely together, so that public transport and schools in particular are provided early in the life of new communities and conveniently located to minimise the need for car use. This is particularly the case where relatively fragmented land, such as in the Playford growth areas, is being developed.

#### Capitalising on strategic transport infrastructure

The proposals in the discussion paper to ensure the ongoing protection of strategic transport infrastructure and corridors are endorsed, while noting that these have specific implications for Playford, given the presence of facilities such as RAAF Edinburgh, SCT intermodal and major road and rail transport corridors.

NASAG has proposed safety zones for RAAF Edinburgh and Playford has made comment during the public consultation process that these require more detailed consideration before endorsement and application. They should not be applied to the Code in their current form and would have impacts on economic development. It is also noted that NASAG indicated the safety zones as advisory and not mandatory. The current policies applying to the SCT intermodal at Penfield are considered reasonably appropriate for transition although fine tuning should be considered. It is also noted that consideration of opportunities for commercial (or similar) zoning strategically located adjacent major arterial routes is appropriate. There are opportunities, particularly within the northern CBD / Elizabeth Regional Centre to capitalise on the location of the Elizabeth Railway Station and interchange for commercial / retail / mixed use development.

Consideration should be given as to whether, with the likely introduction of less polluting electric and potentially hydrogen vehicles, there is the need to be implementing more stringent air pollution requirements for development adjacent major transport corridors.

There is potential to include B-double routes in addition to strategic transport routes on mapping for the Planning and Design Code.

#### Sustainable mobility, car parking and impact of technology

The transition of policies to the Code is proposed for walking and cycling and design of car parking structures. Proposals for reform which are supported include proposed cycle routes (such as identified in cycling strategies); reviewing car parking rates in Greater Adelaide and encouraging uptake of new technologies. It is noted that Bike Direct routes could also be shown on Planning and Design Code mapping.

Car parking requirements for residential development in outer metropolitan suburbs should be sensitive to the needs of residents and the standard of public transport provision. In such areas public transport connectivity can be poor (without the prospect of improvements to services) and many households require two cars. It is inappropriate to significantly reduce car parking provision in these circumstances. In close proximity to high frequency routes such as the Adelaide-Gawler Railway, adjustments to parking rates would be more appropriate to recognise public transport availability and encourage its use.

With reduction in car parking requirements the ratio of provision of parking for disabled persons needs reconsideration, as the number of disabled car parks would not significantly reduce with improved availability of public transport.

The City of Playford looks forward to the matters raised being given strong consideration in finalisation of the planning policy reform process.

Yours faithfully



**GLEN DOCHERTY  
MAYOR**