

**Submission to the State Planning Commission regarding the Draft State Planning Policies for South Australia**

Social Planners Network of South Australia

21 September 2018

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21 Sep 2018  
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Thank you for the opportunity to make a written submission regarding the State Planning Policies. This submission is from the Social Planners Network of South Australia (SPN).

The SPN is a group of professionals from a wide range of fields with an interest in high quality social outcomes for communities across the state. In the main SPN members are urban planners, social planners and community services staff working in Local Government. The network also includes representatives from State agencies and private consultancies with expertise in these disciplines. There are more than 100 members of the Social Planners Network.

The views expressed in this submission are those of the SPN members who contributed to it, reflecting their specialist expertise, and are not necessarily reflective of the views of the organisations our members are employed by.

SPN notes the importance of the State Planning Policies (SPP) as the highest statement of spatial policy in SA's new planning system, and the intention that the SPP provide the framework for land use planning and development that will improve the liveability, sustainability and prosperity of South Australia. It is also noted that the SPP must reflect the planning aspirations of the communities which they serve, in order to be effective.

Key concerns for the Social Planners Network include the extent to which SA's new planning instruments, including the SPP, will:

- facilitate social connection, social inclusion and opportunities for encounter
- ensure an equitable distribution of opportunity and resources across our cities and towns
- reduce (rather than entrench) locational disadvantage
- deliver safe and accessible buildings and environments
- integrate social infrastructure into development in a timely way
- provide environments that are 'all ages friendly'
- accommodate diversity and choice in lifestyles and cultural expression
- support human health
- promote cultural heritage
- make the activities of daily life easier, and
- contribute to affordable living.

These are some of the important ways urban planning and development contribute to liveability, community wellbeing, and quality of life. They reflect our understanding of the needs and aspirations of South Australians as experienced through many years of urban planning, social planning, community engagement and community services practice.

To this end, SPN offers the following feedback and recommendations on how the SPP could be improved.

## 1. Inconsistent content of the SPP

There are a number of cases where the introductory statements that set the scene for each SPP do not appear to be consistent with the policies themselves. For example, the introductory comments regarding 'Our Infrastructure and Movement Systems' includes some good content about the importance of coordinating the full range of infrastructure and services that are needed by communities:

*"Infrastructure includes the goods and services provided to the community to support a desirable standard of living. It includes both physical infrastructure (e.g. water, power, communications and transport) and social infrastructure (e.g. education health and policing)..."*

*The integration of infrastructure with land use planning will deliver benefits such as: ...*

- *Improved accessibility to social and physical infrastructure to improve our standard of living"*

Draft SPP, page 48

This content is not well reflected in the 'Our Infrastructure and Movement Systems' policies themselves, which only focus on transport and energy. There is a critical policy gap in the SPP regarding social infrastructure in particular.

It is recognised by the SPN that the SPP are not a comprehensive statement of all relevant policies, and that they will be added to over time, but we would like to see a fuller representation in the policies themselves of the good range of matters referred to in the preambles.

SPN recommends that the policy gap regarding social infrastructure coordination and provision be addressed in the People and Neighbourhoods Discussion Paper, currently under development.

The Victorian Planning Authority's approach may be worth considering. Social Infrastructure of a range of types is addressed through policy, precinct structure planning and infrastructure contribution schemes in an integrated and consistent way.

<https://vpa.vic.gov.au/strategy-guidelines/infrastructure/community-infrastructure-planning/>

A further example of this inconsistency of content between introductory statements and the policies themselves can be found in SPP 6: Housing supply and diversity. The introductory statement refers to the well-established policy of *"a minimum of 15% Affordable Housing in significant development areas"*, but the policies themselves omit any mention of this 15% target.

## 2. Missing policy content: education

It is of particular concern to the SPN, that there is no agreed policy statement from State Government about the planning and provision of education facilities and services across the state. This is a critical gap. Education is an up-stream determinant of health and an important site for building networks, and social inclusion in local communities. Schools also require good land use planning and design to ensure they:

- are well located and accessible in the student catchment they serve
- support co-location with open space, sport/recreation and other community facilities
- promote active transport by students
- are delivered in a timely way to meet community expectation and need, and

- do not require expensive land purchases at residential prices.

These coordinated outcomes do not happen by accident, and there is an urgent need for better leadership and policy direction for planning education infrastructure in South Australia. The importance of locating housing near to services and infrastructure is stated in the Draft State Planning Policies for South Australia (eg SPP1: policies 1 & 6, SPP6: policies 2 & 8 and the diagram on page 3), but planning for education is not given sufficient attention.

Other jurisdictions in Australia appear to have progressed this more successfully than South Australia.

For example, the Western Australian Planning Commission's 'Liveable Neighbourhoods' includes extensive guidance for locating schools to support neighbourhood level walkability and liveability.

<https://www.planning.wa.gov.au/Liveable-neighbourhoods.aspx>

The Victorian Planning Commission (VPC) has also recognised the need for the State to plan proactively for all schools, including non-governments schools, and has an integrated approach:

<https://vpa.vic.gov.au/strategy-guidelines/infrastructure/planning-for-schools/>

The following is an extract from the VPC guidance notes for precinct structure planning that spells out this policy position and objectives:

*A comprehensive approach to land use planning for education provision is needed in new suburbs. This includes planning for non-government schools, which account for around 30 per cent of student enrolments in Victoria.*

*Objectives:*

- *To ensure that Melbourne's new communities have good access to non-government schools.*
- *To help non-government schools secure well located sites in new suburbs.*
- *To avoid extra costs associated with poorly located non-government schools, and help realise benefits from co locating non-government schools with other community facilities.*

<https://vpa-web.s3.amazonaws.com/wp-content/uploads/2016/09/PSP-Note-Non-government-schools.pdf>

### **3. Application of 'Principles of Good Planning' in the draft SPP**

Pages 14 – 15 reflect the Principles of Good Planning included in the PDI Act. In some instances, however, the content of SPP do not seem to adequately reflect these principles.

For example:

*High Quality Design Principles:*

- *Built form and the public realm should be designed to be inclusive and accessible to people with differing needs and capabilities (including through the serious consideration of universal design principles) (emphasis added)*

The principles of Universal Design are not strongly expressed in the draft SPP, being largely limited to one policy statement (SPP 2, Policy 2) that reads "*Promote best practice in access and Inclusion planning in the design of the buildings and places by applying the principles of universal design,*

*Access for All, Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Design*". The verb in this Policy should be changed from "promote" to "Ensure best practice in access and inclusion planning...".

There will also need to be very clear guidance materials, design standards, Planning and Design Code (policy library) and training in universal design for planning and design professionals to ensure that this Principle of Good Planning is reflected in building and public realm design, planning decisions and more accessible and inclusive places. There are some great resources available now which incorporate universal design into the public and private realm, and go beyond minimum DDA compliance, for example:

<https://designfordignity.com.au/retail-guidelines/index.html>

<http://www.livablehousingaustralia.org.au/>

In other content of the SPP, terms such as "*walkable neighbourhoods*" would be better described as "*walkable and accessible neighbourhoods*". This would better reflect this Principle of Good Planning throughout the SPP.

A gap in the Principles of Good Planning is the omission of reference to sensitive development with regard to social and cultural aspects (including Aboriginal cultural heritage aspects) of the location. This could possibly be addressed via the SPP by including in the Design Quality SPP a policy principle around local setting and context with specific reference to Aboriginal heritage.

#### **4. Targets**

SPN supports the inclusion of targets in the planning system for the State, beyond their use to measure the progress of the *30-Year Plan for Greater Adelaide*.

It is important, however, that the selected targets incorporate the Principles of Good Planning and reflect a state-wide application. These were not the context of the development of the Targets in the *30-Year Plan for Greater Adelaide*, and so further work is required to ensure the targets are appropriate for the new planning system and have a state-wide focus.

In particular, it is not clear that 'High-quality design principles' and 'Integrated delivery principles' are currently addressed through the targets. Additional targets are needed to monitor the progress of the public realm design quality, universal design, coordinated delivery of infrastructure and services with development, and equitable access to services and amenities content of the Principles of Good Planning. Existing targets 2, 3 and 4 should have additional measures developed for non-metropolitan settlements in SA. These may be different contexts to Greater Adelaide, but the targets are worth measuring and improving in ALL urban settlements.

Target 6.2 for Greater Housing Choice is potentially meaningless in its current form. Housing diversity in many regional cities and towns is currently poor. For example, only 23% of dwellings in Mount Gambier, 17% in Port Pirie, 19% in Port Lincoln are *not* detached houses. Increasing this by 10% will not affect much change if the result is that housing diversity increases to 25% in Mount Gambier, 19% in Port Pirie and 21% in Port Lincoln.

The changing demographics of regional cities and towns required that a more robust target be set than 10% on existing low levels of housing diversity. It is our recommendation that the target be the same as the one for Greater Adelaide: a 25% increase. This may not be easy to achieve in some

locations (ie where there is little development activity) but it will be more meaningful and produce a better result than the proposed 10% increase.

## 5. Glossary

There are some terms missing and some inconsistencies of language that need to be addressed. SPN requests that the following be included or clarified:

- ‘Universal design’ appears on page 15 and is undefined
- ‘Essential services’ appears on page 45 in SPP 9: Policy 1 and is undefined
- ‘State significant operations and industries’ appears on page 45 in SPP 9: Policy 2 and is undefined
- ‘Social infrastructure’ is used in a number of places but is undefined.

Social Infrastructure is variously described in the document. The description on page 48 does not match the definition of Community Infrastructure included in the glossary on page 66, and it is unclear in a number of places where ‘infrastructure’ is referred to if that always includes social infrastructure. Therefore, this term needs a definition in the glossary. It would also be preferable for the term ‘infrastructure’ to be interpreted as referring to both physical and social infrastructure, unless limited by another term such as ‘physical’ or ‘built’ etc.

We prefer the three-part definition of social infrastructure that was developed in 2012 for the LGA funded project *Planning for Social Infrastructure and Community Services for urban Growth Areas*. This includes community facilities, human services and community development:

- Community facilities are the ‘hard infrastructure’ component that includes a variety of buildings and associated grounds used for community purposes
- Community development is the processes that assist community members to identify and address their needs
- Human services are the formal services that provide support, advice, education and information to a wide range of groups within a community.

[https://www.lga.sa.gov.au/webdata/resources/files/2010\\_10 - Project Output - Implementation Guide %28February 20012%29 - Development of Social Infrastructure in Growth Corridors.pdf](https://www.lga.sa.gov.au/webdata/resources/files/2010_10_-_Project_Output_-_Implementation_Guide_%28February_20012%29_-_Development_of_Social_Infrastructure_in_Growth_Corridors.pdf)

## 6. Comments on specific State Planning Policies

### *SPP 1. Integrated Planning*

What/ page/ref	Comment	Recommendation
Urban typology diagram  Page 21	The diagram is a problematic and unhelpful way of describing SA’s urban settlements. It appears to contradict the intent of the SPPs. For example:  Outer suburbs should not be assumed to be ‘car dependent’. This is not desirable or best practice. There is also no reference to schools except in reference to Inner Suburbs and Infill Development. Schools are critical	Integrated planning is not represented very successfully in this diagram.  We recommend a major rework of its content and purpose, or complete

	infrastructure and services for all of the typologies except 'Natural Areas'. Even Rural Areas have and need schools in established townships.	removal.
Policy 4 Page 22	This policy should include reference to services and facilities, as well as infrastructure. These are equally important to integrated planning.	Change the text as follows:  <i>"... timely delivery of investment in <b>services, facilities</b> and infrastructure commensurate with..."</i>
Policy 7 Page 22	Policy 7 promotes housing choice around strategic transit corridors. Caution needs to be exercised regarding housing density housing in busy road corridors. The health impacts of noise and pollution from busy roads is significant. This will need to be addressed in the policy detail and development controls to ensure negative impacts are avoided through in location choice and design of residential developments.	Modify Policy 7 to ensure adequate considerations for human health in location and design of housing in high traffic road corridors
Non-statutory Guidance Notes Page 23	Related Legislation should include:  South Australia Public Health Act 2011  Disability Inclusion Act 2018	Add these related pieces of legislation
Non-statutory Guidance Notes Page 23	An additional non-statutory instrument is design standards and guidance for social infrastructure. Much of the required integration includes social infrastructure and services, but there is no current and contemporary guidance / standards for SA to assist with achieving the desired integrated planning. Currently each Council and each developer is applying different standards, and there are missed opportunities to achieve integrated and cost effective outcomes for communities.	Add design guidance and standards for social infrastructure:  <i>Design Standards should be developed that set out the desired level of social infrastructure and services provision and mechanisms to ensure integration with development.</i>

*SPP 2: Design Quality*

What / Page/ Ref	Comment	Recommended change
Policy 2 Page 25	Given the importance in the PDI Act of universal design of the built environment, the language of this policy is not adequate. "Promotion of best practice in access and inclusion planning" is not sufficient to ensure that there will be change in the design of buildings and places.	Change the wording of Policy 2 from " <i>Promote best practice...</i> " to " <b>Ensure best practice...</b> "
Policy 2	Policy 2 seems to have some non-related content such as " <i>Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Design</i> " which are important but not directly related to achieving best practice in access and inclusion planning.	Add a new policy that includes Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive

Social Planners Network submission on *Draft State Planning Policies*

	These approaches to design quality are important and need to be in a separate policy.	Design
Non-statutory Guidance Notes	It is critical that the State codifies universal design for access and inclusion into design quality statements and planning policy in the Code so that they must be considered in Development Approval decisions. The State will need to explore a range of mechanisms to incorporate universal design into all relevant standards and codes to ensure this requirement cannot be ignored or treated as too difficult in an 'on balance' assessment or in a public realm design project.	Add text as follows:  "Design Standards should be developed over time that set out the desired level of public realm <b>and building design to incorporate universal design principles.</b> "
Other	There is opportunity to refer to the principles of Indigenous placemaking and to consult SA communities on guidelines for SA. This could be a significant contributor to design quality and sense of place, but this will require a higher level of cultural competencies for built environment professionals.	Explore opportunities to strengthen inclusive placemaking and develop cultural competencies in the built environment profession through planning reforms.
Other	Urban design can have a significant impact on the social determinants of health and general wellbeing. The work done by the Heart Foundation on Healthy By Design is an example of the connection between urban form and wellbeing. There are opportunities to make this more explicit and to improve links to public health and the requirement under the SA Public Health Act for assessing the health impact of development.	Use a Health in All Policies approach to add more explicit policy that recognises the connection between wellbeing and good design.

*SPP 3: Adaptive Reuse*

What / Page/ Ref	Comment	Recommended change
Policy 7 Page 26	This policy does not include reference to accessibility, and this is a concern. If conversion and adaption of buildings stock to a new use is to be promoted, this should not be at the cost of excluding those with mobility challenges.	Change the wording of the policy: <i>"Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health, <b>safety and accessibility</b>".</i>

*SPP 5: Climate Change*

What / Page/ Ref	Comment	Recommended change
Policy 3 Page 31	Policy 3 appears to have something missing. It talks about the <i>"development of climate-smart buildings that reduce our demand for water and energy and mitigate the impacts of rising temperatures"</i> , but the methods listed	Review the wording of the policy to ensure it includes reference to aspects of building design which can

	<p>for doing this do not include building design. Instead they are mainly public realm approaches: “<i>water sensitive urban design, green infrastructure, urban greening and tree canopy enhancement</i>”.</p> <p>These strategies are supported by SPN but there needs to be additional content of the policy that addresses aspects of building design including shading and insulation, orientation, passive solar design, colour and material choices, water collection and reuse etc.</p>	<p>reduce demand for water and energy such shading and insulation, orientation, passive solar design, colour and material choices and water collection.</p>
Other	<p>SPN notes that there are significant opportunities to improve the application of existing policies that aim to address water and energy efficiency.</p> <p>There is also a National Energy Efficient Buildings project that SA Government has played a lead role in.</p> <p><a href="https://www.eex.gov.au/programs/national-energy-efficiency-building-project">https://www.eex.gov.au/programs/national-energy-efficiency-building-project</a></p>	<p>Ensure existing Instruments and Codes are more effectively applied.</p>

*Our People and Neighbourhoods*

What / Page/ Ref	Comment	Recommended change
<p>‘Healthy Neighbourhoods’ Diagram</p> <p>Page 35</p>	<p>This Diagram from the 30-Yr Plan 2017 Update expresses the valuable concept of 20-minute neighbourhoods or ‘complete communities’. In principle it is supported by SPN, but there are concerns including that:</p> <ul style="list-style-type: none"> <li>SA does not have effective mechanisms to deliver the intent, especially with regard to coordinated social infrastructure and access to employment centres</li> <li>substantially increasing residential densities is the main mechanism in place to deliver the population numbers that will support this level of access and amenities, and this may be difficult in many parts of Adelaide and the State</li> <li>only a very small proportion of the State’s population will live in an area that has this level of amenity, and that this will be available mainly to higher income households in inner suburbs</li> <li>the service catchments are in some cases unrealistic and unaffordable in the Australian context eg provision of a Library within an 800 m distance or 10 min walk. Local Governments typically provide one central library per municipality, and sometimes one or two smaller branch libraries if populations are highly dispersed. The population densities would have to be extremely high to provide a public library every 1.6 kms.</li> </ul>	<p>Note comments and consider how to address these factors through new planning instruments so that more South Australian can benefit from liveable, healthy neighbourhoods.</p>

*SPP 6: Housing Supply and Diversity*

What / Page/ Ref	Comment	Recommended change
Policy 2 Page 36	<p>The wording of this policy suggests that housing should be provided where services, facilities, public transport and infrastructure are available.</p> <p>SPN is concerned this will result in cumulative impacts on the capacity of existing infrastructure and services that are not well addressed in planning processes. Spare capacity cannot always be assumed, and there will need to be better ways to address augmentation as part of planning decisions in areas that are subject to increased densities.</p> <p>It is vital to community wellbeing and neighbourhood liveability that services, facilities and infrastructure are coordinated with development and provided in a timely way, as has been raised already in this submission.</p>	
Policy 5 Page 36	<p>This Policy could include a wider range of approaches to improving housing choice and diversity. Eg tiny houses, dual occupancy, ancillary dwellings (granny flats).</p> <p>There are a range of tenures and community housing approaches that will also increase retirement housing options. The Policy is currently framed in a way that is too limited.</p>	<p>Expand the description of how more innovative housing choices can be achieved beyond small lot housing and aged care accommodation.</p>
Policy 6 Page 36	<p>It is unclear why family households are not included in this Policy.</p> <p>It is also unclear why this is limited to Adelaide City when it can apply equally in the inner suburbs.</p>	<p>Widen the range of housing choices promoted for Adelaide City.</p> <p>Add reference to inner suburbs to Policy 6.</p>
Policy 7 Page 36	<p>The target of 15% Affordable Housing should be included in the Policies. It is mentioned in the Introductory statement and is established State government policy. Its absence suggests that this is no longer supported by the State.</p>	<p>Add 15% Affordable Housing to the Policy.</p>
Policy 8 Page 36	<p>This policy is supported but it does not appear to include education and childcare services as they are not listed, nor covered by the definition of community infrastructure in the glossary.</p>	<p>Include education and childcare as critical social infrastructure in healthy neighbourhoods.</p>
Policy 8 Page 36	<p>It is noted that the well-established provision rate of 12.5% open space allocation in residential areas is not included in the SPP. This (and the open space fund that is linked to it) is a valuable mechanism to ensure equity of access to open space and should be included in the SPP.</p> <p>It is noted that <i>quality of open space</i> is not always well addressed by this formula and there is merit in</p>	<p>Add a Policy that refers to 12.5% useable open space contribution in residential areas (or a financial contribution in lieu of providing land.</p> <p>Investigate policy that better</p>

Social Planners Network submission on *Draft State Planning Policies*

	<p>approaches that consider quality of, as well as access to, open space linked to residential development.</p> <p>New green infrastructure approaches such as provision of roof gardens in apartment development have a role to play as well, but do not entirely replace public open space.</p>	<p>addresses quality of public open space and new approaches to open space provision.</p>
Other	<p>There appears to be an assumed link between higher density housing, walkable neighbourhoods and housing affordability within the SPP 6. It is not the case that these are automatically linked, and higher density housing in well located and walkable neighbourhoods may well attract a price premium and become less affordable over time. This risks the further dislocation of lower income households from facilities which are close to services and jobs.</p>	<p>Recognise and closely monitor the impact of increasing density in inner suburbs on housing affordability.</p>
Other	<p>The Objective and Policies are not explicit in regard to housing for a range of people with complex needs or disability. Reference to supported housing, respite and specialist disability housing would address this.</p> <p>It is also important that there is good monitoring of the diversity of housing including provision of specialist and supported housing types.</p>	<p>Incorporate additional descriptors of diverse housing for special needs.</p> <p>The Housing and Employment Land Supply Report (HELSP) should be tweaked to report on a broader range of diverse housing types. So that we know what is available, where the gaps are etc</p>
Other	<p>The Non-Statutory Design Guidance Notes include reference to ‘adaptable housing’ but this content does not appear to be included in the Policies themselves.</p>	<p>Add a Policy regarding universal design for adaptable housing.</p>
Other	<p>An opportunity has been missed in this Policy to promote good neighbourhood design that helps people to connect to each other and to meaningful activity (not just to infrastructure, services and employment).</p> <p>Social capital has strong links to wellbeing and neighbourhood design can foster this or create barriers.</p> <p>This includes street layout (permeability), streetscape design, orientation of dwellings, provision of shared spaces, low fences natural surveillance and promotion of neighbourliness.</p> <p>This intent appears in paragraph 5 of the introductory statements but is missing from the Policies themselves.</p>	<p>Add additional Policy content regarding neighbourhood and dwelling design to promote social connection and meaningful activity.</p>
Non-statutory Guidance Notes	<p>The Planning and Design Code should also ensure there is guidance regarding accessible provision of access to local shops, community facilities and infrastructure, active travel, public transport, quality open space, recreation and sporting facilities to ensure that Policy 8 is translated into statutory planning decisions.</p>	<p>These aspects of ‘healthy neighbourhoods’ will need to be reflected into the Planning and Design Code, alongside Affordable Housing, housing choice and diversity and best practice adaptable housing</p>

		design.
Non-statutory Guidance Notes	Related Legislation should include: South Australia Public Health Act 2011 Disability Inclusion Act 2018	Add these related pieces of legislation.

*SPP 7 Cultural Heritage*

What / Page/ Ref	Comment	Recommended change
Other	The Policy would benefit from additional content regarding cultural expression and cultural vitality in local communities. The built environment makes a big contribution to this and it is largely missing from this section.	
Other Page 38	A gap in the current urban planning system is that Aboriginal cultural heritage information is not considered in a meaningful way in the Development Approval process.  This 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 DA process with awareness of the location of registered Aboriginal sites.	Add a policy that connects the responsibilities of the two mentioned departments so that Development Approval is more mindful of Aboriginal heritage sites and stories.
Non-statutory Guidance	Related Legislation should include: Native Title Act 1993	Add this related piece of legislation.

*Our Infrastructure and Movement Systems*

What / Page/ Ref	Comment	Recommended change
Introductory Comments Page 48	There is significant content in the introductory comments that does not appear in the SPP itself. A key gap already raised in this submission is social infrastructure policy. This will need to have a considerable improvement via Policy, Standards and Guidelines if the state's aspirations for liveable and healthy neighbourhoods are to be realised.  The new General Infrastructure Scheme may provide a mechanism for delivering social infrastructure (in some limited circumstances).	Develop new SPP that reflects a full range of infrastructure required by communities.  Support this with design standards and guidelines, and link these to the General Infrastructure Scheme.
Page 48	A key contribution of coordinated infrastructure planning is the reduction of locational disadvantage across urban areas. Equitable access to infrastructure and services is a	Add content to the SPP that recognises the important contribution urban planning

	<p>key factor in liveable cities and this section could incorporate that message.</p> <p>It is very important that The Planning Commission ensures that locational disadvantage is reduced and equity is improved through the new planning instruments.</p>	<p>makes to improving equity and reducing locational disadvantage.</p>
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*SPP 11 Strategic transport Infrastructure*

What / Page/ Ref	Comment	Recommended change
Introductory comments Page 50	<p>This section should include reference to movement systems that support accessibility for all and adapt to enabling technology. This would fit under the “<i>Connecting people with places and opportunities</i>” subheading.</p> <p>Cities and towns should be planned and designed to be well connected in ways that facilitate the safe, secure and efficient movement of people within and through them by applying universal design principles.</p> <p>A good resource about accessible transport is the Federal Government report <i>The Whole Journey Guide: A guide for thinking beyond compliance to create accessible public transport journeys</i>: <a href="https://infrastructure.gov.au/transport/disabilities/whole-journey/index.aspx">https://infrastructure.gov.au/transport/disabilities/whole-journey/index.aspx</a></p>	<p>Add content about universal design and accessible transport to introductory comment and to the policies.</p>
Policy 1 Page 51	<p>Add ‘accessible’ to this Policy and also include reference to learning and education</p>	<p>Change the policy as follows: <i>Enable an efficient, reliable, <b>accessible</b> and safe transport network connecting businesses to markets and people to places (i.e. where they live, work, visit, <b>learn</b> and recreate)</i></p>
Policy 5 Page 51	<p>This policy could be clearer about what is meant by negative impacts – eg noise, pollution.</p> <p>There will also need to be strong and clear mechanisms to ensure that increasing density of living around transport corridors does not have negative health impacts.</p> <p>Design will need to mitigate noise, odour, air pollution and address factors like waste collection in higher density development.</p>	<p>Clarify content of the policy.</p>
Policy 6 Page 51	<p>The policy intends to support more active travel and greater use of a variety of travel modes. Having a real impact on travel choices will require new mechanisms to deliver joined up walking and cycling routes, with a consistent quality of public realm and infrastructure</p>	<p>The design and infrastructure facilitators and enablers of more active travel are not clearly stated in the Non-statutory Guidance notes, nor</p>

	environment (including off road cycling paths, shared trails, footpaths, trees/shade etc), as well as mixed use destinations and a more compact urban form. Currently the delivery of these enablers is un-coordinated and this is a barrier that could be addressed through new planning instruments including public realm design standards and infrastructure schemes.	spelt out in the Policy. More detailed work on new planning instruments will be needed to address this gap.
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*SPP 13 Coastal Environment*

What / Page/ Ref	Comment	Recommended change
Other Page 58	Generally, the coastal environment is particularly significant in terms of Aboriginal cultural heritage. This is not recognised in the Coastal Environment SPP.  There is no 'Creeks and Waterways' (or similar) SPP. Generally, these areas are also of elevated importance in relation to Aboriginal cultural heritage.	Consider the inclusion of content in this SPP that recognises the special importance of the coast (and waterways) in Aboriginal culture.

On behalf of the SPN, thank you for the opportunity to contribute to the development of the State's new urban planning instruments.

Yours Sincerely



Mike Brown

Convenor, Social Planners Network of South Australia