



An Australian Government Initiative



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Att: Expert Panel  
Planning System Implementation Review  
via email to [DTI.PlanningReview@sa.gov.au](mailto:DTI.PlanningReview@sa.gov.au)

Dear Expert Panel and Review Staff

### **RDAYMN submission to the Planning System Implementation Review**

Regional Development Australia Yorke and Mid North (RDAYMN) thanks you for the opportunity to provide this brief submission to the Planning System Implementation Review (the Review).

RDAYMN is an incorporated organisation funded by Federal, State and local governments. Our main goal is to promote and facilitate sustainable community and economic development within the regions of the Yorke Peninsula, Mid North and Southern Flinders Ranges. During the past ten years RDAYMN has worked alongside a number of councils, businesses, community and not-for-profit groups to increase economic activity and competitiveness and to enhance social and environmental outcomes for our region.

As part of our work in helping to support and facilitate economic development in the region, RDAYMN work with a range of stakeholders that engage with the planning system, either as developers, planners or decision makers.

This submission summarises (at a high level) some of the key perspectives and common themes we have identified from stakeholders in respect of their interaction with the current planning system, with a view to draw the Expert Panel's attention to areas for potential refinement or improvement based on stakeholders' feedback.

Noting our organisation does not possess specific expertise in this field, RDAYMN welcomes the opportunity to discuss any aspect of this submission with the Expert Panel and Review staff to provide further clarity or elaboration as may be helpful.



#### **Local Government Partners**

Clare & Gilbert Valleys Council | Barunga West Council  
District Council of Mount Remarkable | Northern Areas Council  
District Council of Peterborough | Wakefield Regional Council  
Yorke Peninsula Council | Regional Council of Goyder  
Copper Coast Council | Port Pirie Regional Council  
District Council of Orroroo / Carrieton

## **Planning, Development and Infrastructure Act 2016**

### *Infrastructure schemes*

Noting the pilot program conducted prior to the implementation of the Act and absence of schemes initiated since referenced in the discussion paper, it is noted that ports infrastructure is one area where further work might be done in developing test cases.

- Stakeholders developing port projects note that given the lack of port projects progressing to delivery phase in recent decades, the process for agreeing licensing and planning processes involves an element of discovery for both proponents and regulators. This has involved some challenges around barriers and information gaps which have complicated (slowed) approval processes.
- Specific barriers to be worked through (at least illustratively) could include licensing arrangements for maritime assets impacting Crown Land (i.e. the seabed), as well as access arrangements for supporting interfaces between landside and maritime assets.

In response to question 12 of the feedback questions posed in the PDI Act Summary Paper specifically, the creation of standard cost allocation (and recovery) models for different types of infrastructure could help provide greater certainty to proponents contemplating or negotiating common augmentation projects, potentially simplifying and de-risking these types of projects.

- By way of example, a cost allocation model for delivering a stormwater management project for the Port Pirie South West Drainage Scheme could help secure and expedite significant land releases that would help address the regional city's housing crisis.

In response to question 17, stakeholders involved assessing applications cited challenges with meeting prescribed timeframes at times, particularly when processing significant volumes of applications (e.g. during COVID-19). Whilst this volume (and average time taken in processing applications) may reasonably be expected to vary over time, it is noted that smaller regional councils often lack the resources required to cover significant (temporary) increases in applications by virtue of the size of their planning departments not affording redundancies. As a result, small regional council are likely to find it more challenging to meet prescribed timeframes in these circumstances.

## **Planning and Design Code**

### *Infill Policy*

In response to question 4 of the Infill Summary Paper (in response to respective roles and responsibilities of different levels of government generally, rather than with regard to infill specifically), many local government stakeholders have noted their planning and regulatory teams have had to deal with considerable frustration by applicants during the implementation of the Code, with many applicants not understanding the fact that local government is now responsible for interpreting (rather than setting) the Code.

- Planning and regulatory teams have often had to deal with frustrated stakeholders whose expectations have been rooted in previous experiences with assessments, instead of the current process under a common set of state-wide provisions.
- Many stakeholders have indicated they would appreciate better communication around the role and application of the Code at the state-wide level to help manage stakeholder expectations.

- Consideration to expanding the planning process to enable in-fill in Regional Cities which includes appropriate residential development should be considered. By way of example many of the Main Streets in Yorke and Mid North have vacant buildings which have not been maintained to a relevant planning code, condition or contemporary amenity and change in retail usage has meant that either retail has converted to peri-CBD areas with bulk goods status and/or the number of retail businesses has significantly reduced since 1990. Re-vitalisation of these spaces with thoughtful residential development would not only alleviate condition concerns but bring increased amenity to these centres and potentially encourage greater tourism and hospitality outcomes.

### *Car Parking Policy*

In response to question 2 of the Car Parking Summary Paper (less so a spatial question but intensity), some stakeholders have cited concerns around the differences between the rates of parking required based on types and intensity of land use.

- By way of specific example, stakeholders have expressed frustration around different rates being applied between different types of commercial land use, arguing the extent of the difference is not justified.
- RDAYMN acknowledges there are a number of considerations to be had in respect of allocating parking requirements between cost of development, urban amenity values, congestion management and transport efficiency.
- Additional categories of land use, or flexibility based on intensity of use, may provide additional tools for balancing these considerations.

In response to question 18 of the relevant summary paper, there is an opportunity to deliver other public policy objectives if the process for setting the location of charging infrastructure takes the utilisation on distribution networks into account. This could help manage potential constraints in the network, or improve utilisation of existing network augmentation projects which might otherwise be considered marginal.

- By way of example, it is understood that development within the Jamestown Industrial Estate (located adjacent to RM Williams Way along Wenhams Road) is constrained due to lack of available capacity in the substation (more generally) and issues extending the network (more specifically). If planning around the location(s) of charging infrastructure had consideration for network effects, this could help unlock new development by helping to support additional load on the network extension.

### *Change of Use*

We also have had specific feedback that the requirement to undertake a soil assessment for change of use has discouraged the conversion of per-urban or rural living to residential land with cost estimate of between \$5,000 to \$10,000 for a rural living blocks to residential being an impediment to moving to increase residential land supply.

### *Rural Living and Demand*

We are aware of two specific areas, one in Clare and one in Yorke Peninsula, where residential or rural living developments have not been approved by the Department on the basis of lack of demand. RDAYMN data shows a rental vacancies of less than 0.1%, limited supply and a future pipeline of over \$10B under consideration the greatest impediment to growth is the availability of workforce and housing. We would encourage the Department to reach out and discuss these developments directly

with RDAYMN, and to discuss a system where input on growth areas and demand can be ascertained against contemporary demand and growth.

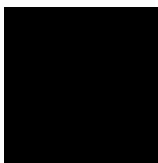
### **ePlanning system**

In response to questions 17 and 20 of the feedback questions posed in the PDI Act Summary Paper (and related to question 26 of the ePlanning Summary Paper), developers have often cited frustrations with not being able to progress aspects of development applications simultaneously, or on a provisional basis.

- In these circumstances, developers have described having to halt progress on their applications to address individual aspects, whereas previously they might have continued to progress other aspects in parallel, or aspects requiring further information or corrections on a provisional basis before returning to address any final changes or corrections upon finalising the application. Several developers have expressed a desire that they be able to progress different aspects simultaneously.
- In particular we note in Regional Areas that lack of an identified individual to communicate with has left developers feeling frustrated, has seen them abandon developments and created a barrier between Councils and Developers. While there are practical solutions that some Councils have adopted including a Case Management and client-based service some personalisation but ingraining this process would increase outcomes for the whole of class.
- Councils report in turn that the system and the increased steps and implementation has resulted in them being required to hire extra planning resources, which are scant and in particular with the lack of tertiary planning options now being offered by Tertiary Institutions, this has contributed to an unintended consequence of the introduction of the e-planning system either being perceived as, or in actuality, increasing planning timeframes.

RDAYMN would be pleased to discuss this submission, and any of the specific examples referenced, with the Expert Panel or Review staff further. Please do not hesitate to contact myself or our Economic and Workforce Manager on 1300 742 414.

Yours Sincerely,



**Kelly-Anne Saffin**

Chief Executive Officer

Regional Development Australia Yorke and Mid North