

12 September 2018



CITY OF
Port Adelaide Enfield

State Planning Commission
c/- Department of Planning, Transport & Infrastructure
GPO BOX 1533
Adelaide SA 5001

Via email DPTI.PlanningEngagement@sa.gov.au

To whom it may concern,

Re: Draft State Planning Policies for South Australia - submission

Thank you for the opportunity to comment on the State Planning Policies (SPPs). At its meeting held on 11 September 2018, Council considered the SPPs, and resolved that:

1. The Director Corporate Services' report titled "*State Planning Policies - Discussion Paper*" be received and noted.
2. The covering letter and submission on the discussion paper, which forms Attachment 2 to this [Council] report, be endorsed for submission to the State Planning Commission.

This covering letter and the attached table together form Council's submission on the SPPs. In terms of high-level comments, the role of the SPPs is acknowledged, though overall, it is considered that there is a lack of clarity on how the SPPs will be implemented in practice (along with their ultimate effect on the Planning and Design Code).

To use three specific examples:

1. The *Integrated Planning* policy, while a high-level policy, makes an explicit reference to "reduced carparking", which may be carried over into the Planning and Design Code. (If this were to occur, Council would have reservations with this style of strategic planning.)
2. For the *Climate Change* policy, a guidance note suggests that "policies should...improve and increase land in the public realm..." without advising how such increases would occur in practice.
3. Several policies refer to "employment lands" without providing a definition of the term.

The overall uncertainty in application has also been compounded by delays in the establishment of Regional Plans. The Act envisages a cascading sequence of (1) State Planning Policies, (2) Regional Plans, and (3) the Planning & Design Code -

but the state's current rollout may not necessarily be following the envisaged legal sequence. On this basis, the exact interconnection between the SPPs, Regional Plans, and the Code is considered difficult to interpret and communicate.

Furthermore, the relationship of the SPPs to the *30-Year Plan for Greater Adelaide* needs to be strengthened, and their respective roles in driving development policy need to be clarified.

Council considers that the SPP document, while covering a broad range of matters and detailed in its own right, may require further development in certain respects. As an example, the document has made brief reference to the notion of the "Spatial Atlas", which seems to confer some influence in shaping Regional Plans and the content of the P & D Code. The Atlas is not a Designated Planning Instrument and it is important that its role does not usurp properly developed Regional Plans. The intent and role of the Atlas therefore needs to be clarified.

Council looks forward to continued work with the State Planning Commission and the State Government to establish the new planning system. If you require further information or would like to discuss this matter, please contact Karen Cummings, City Development Manager on telephone 08 8405 6727.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Sarah Philpott', with a long horizontal line extending to the right.

Sarah Philpott
Director Corporate Services

DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA - DISCUSSION PAPER FOR CONSULTATION

Comments on individual policies

#	Citation	Comment
1.	In Policy 1 (Integrated Planning), a spectrum of land types and densities is provided, which ranges from natural areas to the city centre. In this spectrum, <i>Middle Suburbs and Master Planned Communities</i> are depicted as " <i>medium density</i> " (p. 21)	<p>According to Figure 3.1 in the <i>30-Year Plan for Greater Adelaide</i> (p. 139), virtually all of Port Adelaide Enfield is depicted as a "middle metro" region. In this context, the State Planning Policy may suggest that the Council area will accommodate medium density housing by default. This designation is considered to be arbitrary, and may overlook the fact that existing low densities may be crucial to the established characters of many suburbs in the Council area – with the low densities being valued by local residents.</p> <p>The designation implies that future Regional Plans could dictate residential zonings that will not preserve the low densities of existing suburbs. Council seeks that the reference to "medium density" is removed from the entry for <i>Middle Suburbs and Master Planned Communities</i>.</p>
2.	In Policy 1 (Integrated Planning), it is stated " <i>1. Plan growth in areas of the state that are connected to, integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions.</i> " (p. 22)	<p>Read in isolation, this policy is open-ended and could be interpreted to arbitrarily promote growth near any given transport route, service, or employment lands. Such an approach would seem to pre-empt the forthcoming Regional Planning process.</p> <p>As a case study in Port Adelaide Enfield, the western end of Semaphore Rd is simultaneously depicted as a:</p> <ul style="list-style-type: none"> • transit corridor in Map 2 of <i>30-Year Plan for Greater Adelaide</i>; • Historic Conservation overlay in the Development Plan. <p>As this part of Semaphore Rd is already developed, the only growth would come through infill development at higher densities. At the regional planning stage, Regional Plans may be expected to 'plan for growth' in areas that are not necessarily suited to growth (on existing character grounds).</p> <p>Therefore, this policy is considered to be too broad and arbitrary. Council seeks that this wording is tailored in a way to avoid potential conflicts with development character issues at the regional planning stage.</p>

#	Citation	Comment
3.	In Policy 1 (Integrated Planning), it states " 6. Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities. " (p. 22)	<p>As above, this policy could be read to apply arbitrarily, and to any given neighbourhood. In some cases, the regeneration/renewal of certain neighbourhoods may be undesirable on existing character grounds.</p> <p>Council seeks that the policy is rewritten in a tailored manner, by using the expression "<i>regeneration and renewal of neighbourhoods</i>" is replaced with "<i>the nuanced regeneration and renewal of neighbourhoods</i>".</p>
4.	In Policy 1 (Integrated Planning), it states " 7. Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transit corridors with reduced carparking to encourage greater use of active transport options such as public transport, walking and cycling. " (p. 22)	<p>This statement implies that reduced carparking will encourage the adoption of 'active transport', but such implications could be misleading and arbitrary.</p> <p>With Adelaide's residents having an average commuting distance of 13.1 km,¹ it is questionable whether reduced parking will realistically 'encourage greater use' of active transport modes (such as walking and cycling) - especially in areas that are poorly served by public transport.</p> <p>In areas that are better served by public transport (e.g. near public transport interchanges), a lack of park 'n' ride spaces has directly hampered the use of public transport, especially for city commuters.² At public transport interchanges and nodes, an increase in parking can actually encourage the greater use of public transport - contrary to the carparking implications of the state planning policy.</p> <p>Despite reduced average household sizes, increasing population, densification, public transport infrastructure projects, and the encouragement of active transport modes in successive planning strategies, the end result has been an <i>increase</i> in the number of households in Greater Adelaide with 3 or more motor vehicles (between the 2011-2016 Census periods).³ In this sense, the efficacy of 'encouraging greater use of active transport options' is questioned.</p> <p>Council seeks the words "<i>with reduced carparking</i>" to be deleted from the policy.</p>

¹ Australian Bureau of Statistics (2018). *Census of Population and Housing: Commuting to Work - More Stories from the Census, 2016*. Available <http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0.55.001~2016~Main%20Features~Commuting%20Distance%20for%20Australia-1>

² Jenkin, C. (2016). "Adelaide Metro's bus services fail commuters who don't work 9-5" in *The Advertiser*. Available <https://www.adelaidenow.com.au/news/opinion/opinion-adelaide-metros-bus-services-fail-commuters-who-dont-work-95/news-story/c4fcf2ba9c39afb6898b3324b78b2ce7>

³ Profile.ID (n.d.). *Greater Adelaide Number of cars per household*. Available <https://profile.id.com.au/australia/car-ownership?WebID=280>

#	Citation	Comment
5.	In Policy 1 (Integrated Planning), it states " 8. Support metropolitan Adelaide as a predominantly low to medium rise city, with high-rise focussed in the CBD, parts of the Park Lands Frame, significant urban boulevards and other strategic locations where the interface with lower rise areas can be managed. " (p. 22)	<p>The <i>30-Year Plan</i> defines medium-rise development as being 3-6 storeys in height. This definition appears to reflect an international or academic perspective.</p> <p>In the context of the policy, the 'support' of 'predominant' 'low to medium rise' (i.e. 1-6 storey) development throughout metropolitan Adelaide is considered to be too arbitrary. Ideally, determinations of building heights would be conducted at a finer level than a single range for the entire metropolitan region. Further, it is questionable whether the broader community will grasp the possibility of up to 6 storey development, potentially at any locality throughout the metropolitan area.</p> <p>Although the state's promotion of infill development (via the <i>30-Year Plan</i>) is noted, a number of residential Policy Areas in Port Adelaide Enfield envisage a building height of 1-2 storeys. In this context - and without a numerical expression of building heights in the SPP - elements of the community may perceive the policy's phrasing as 'high-rise by stealth.' To avoid the possibility of development up to 6 storeys by default in suburban areas, Council seeks that the reference to "<i>predominantly low to medium rise city...</i>" is replaced with "<i>predominantly low rise city...</i>"</p>
6.	In Policy 2 (Design Quality), it states " 3. Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity " (p. 25)	The intention of this policy is supported, although the use of subjective terms such as "welcoming" and "comfortable" could be difficult to implement (and enforce) in the Planning and Design Code. It may be worth reconsidering these expressions in terms of their delivery on the ground.
7.	In Policy 2 (Design Quality), it states " 4. Ensure design advice is considered early in the planning process for complex developments and utilises consistent and credible processes (such as a Design Review) to ensure better outcomes. " (p. 25)	<p>There are three aspects of this policy that may require further consideration:</p> <p>(1) Although no threshold was set for the term "<i>complex developments</i>," such developments tend to have dedicated consideration on design matters, typically with the input of architects, planning consultants, and the like. In contrast, simpler developments (such as infill housing on narrow residential blocks) tend to have little or no design advice considered early in the process - despite being far more frequent than complex developments. While Council is not necessarily opposed to medium or higher density development <i>per se</i>, these are considered to be developed more efficiently in appropriate (and strategic) locations.</p> <p>(2) With regard to the design advice, it is unclear who the advice ought to come from - whether it be a registered architect, a consultant, Council planning officers, or entities</p>

#	Citation	Comment
		<p>like the Office for Design and Architecture SA.</p> <p>(3) It is unclear who would undertake the Design Review, and whether a development application could be refused (for example) if it does not satisfy such a review.</p> <p>Council seeks that the policy is rephrased to: (1) define the term 'complex developments'; (2) specify which party should provide design advice, and (3) reconsider the notion of the 'Design Review'</p>
8.	<p>In Policy 2 (Design Quality), a non-statutory guidance note states "<i>Regional Plans should also identify where neighbourhood character will change, evolve or not change at all.</i>" (p. 25)</p>	<p>The reflection of a full spectrum of possibilities (i.e. to change, evolve, or not change at all) is supported.</p>
9.	<p>In Policy 2 (Design Quality), a non-statutory guidance note states "<i>Design Standards should be developed over time that set out the desired level of public realm design for areas.</i>" (p. 25)</p>	<p>While this is supported in principle, it is unclear what form the design standards will take - especially if this guidance note is non-statutory. If the design standards are not included in the Planning and Design Code, for example, they may not have any legal enforceability. Council seeks that this statement be clarified.</p>
10.	<p>In Policy 3 (Adaptive Reuse), a non-statutory guidance note states "<i>Regional Plans should implement state policies by identifying buildings that contribute to the built and natural environment and/or character of an area and that have experienced continued dormant use or are vacant</i>" (p. 27)</p>	<p>In some respects, this statement could be seen as discussing the equivalent of Contributory Items (in existing Development Plans), which may not have an equivalent in the Planning and Design Code (or the PDI Act).</p> <p>In practical terms, it would be difficult for Councils to identify all vacant buildings in their Council area. In the case of Port Adelaide Enfield, the Council does not have definitive data on vacant buildings. If such buildings were identified in a Regional Plan, some of them may be later occupied, meaning that Regional Plans are at risk of being outdated within a short time. Council seeks clarification on the practicality of identifying and maintaining a register of vacant buildings.</p>
11.	<p>In Policy 4 (Biodiversity), it states "<i>1. Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat</i>" (p.28)</p>	<p>This statement is supported, but Council seeks that reference is also made to the importance of tree canopy coverage (in order to offset the urban heat island effect). Such a reference could be sourced from existing tree canopy policies in the <i>30-Year Plan for Greater Adelaide</i>.</p>
12.	<p>In Policy 4 (Biodiversity), the introductory commentary states "<i>The planning system has a</i></p>	<p>This sentiment is supported, but is unclear how cumulative impacts will be assessed - whether at the Regional Planning stage, the development assessment stage, or both.</p>

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	<i>role to play in ensuring ecological systems are maintained and enhanced by:... assessing the cumulative impact of development on biodiversity"</i> (p. 28)	Council seeks that this be explained, noting that in the recent <i>Natural Resources and Environment</i> discussion paper, the word 'cumulative' is rarely mentioned (and two of these mentions appear as questions).
13.	In Policy 4 (Biodiversity), it states " <i>2(c) Rehabilitation/restoration—improve degraded or removed ecosystems following exposure to impacts</i> " (p. 28)	This statement is supported, but could potentially be improved in two ways, by: (1) Including reference to biodiversity offsets (as mentioned in the <i>30-Year Plan for Greater Adelaide</i>). While offsets are mentioned in the introductory text to the policy, they could also be reflected in the policy itself. (2) Considering a reference to the use of appropriate indigenous species of plants, given that the selection (and ongoing health) of different species is subject to climate change over time.
14.	In Policy 5 (Climate Change), the introductory text states: " <i>The role of planning [is to] 1. Reduce our emissions and contribution to climate change through:</i> - <i>promoting active travel and walkability and increasing the use of public transport</i> - <i>ensuring energy-efficient building design and green infrastructure to reduce our reliance on carbon-based energy and make our urban environments more liveable</i> - <i>enabling green technologies and industries.</i> " (p. 30)	It is considered that the role of planning could be expanded, to refer to: <ul style="list-style-type: none"> • Ensuring appropriate land use zoning and planning provisions to support renewable energy generation (as distinct from the current reference to green technologies). • Including reference to water-efficient design (to complement the existing reference to energy-efficient design) • Including reference to water-sensitive design (as a means of mitigating urban heat).
15.	In Policy 5 (Climate change), the introductory text states " <i>The planning system provides a great opportunity to improve our resilience, promote mitigation, increase carbon sequestration and take advantage of the challenges climate change presents.</i> " (p. 30)	There are no explicit references to the adaptive capacity of flora or fauna within the document. It is suggested that such a reference is incorporated within the cited statement.
16.	In Policy 5 (Climate Change), the Objective states " <i>Our greenhouse gas emissions are reduced and</i>	The reference to " <i>climate-ready</i> " is subjective; the statement later makes reference to resilience, but the quoted term may need to be rephrased for a general audience. If it

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	<i>development that is climate-ready is promoted so that...</i> (p. 31)	cannot be rephrased, it is suggested that the term is deleted.
17.	In Policy 5 (Climate Change), it states " <i>1. Create carbon-efficient living environments through a more compact urban form...</i> " (p. 31)	The notion that a compact urban form automatically delivers carbon efficient living environments is incorrect. A badly designed compact urban form can create less carbon efficient living environments. Council seeks that the word "compact" is removed, so that the policy applies to all urban forms.
18.	In Policy 5 (Climate Change), it states " <i>3. Ensure the development of climate-smart buildings that reduce our demand for water and energy and mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure, urban greening and tree canopy enhancement</i> " (p. 31)	In some respects, the benefits of green infrastructure can be boosted when developed in conjunction with blue infrastructure (e.g. artificial ponds or wetlands). ⁴ Therefore, Council seeks that the reference to green infrastructure is amended to "green and blue infrastructure."
19.	In Policy 5 (Climate Change), a non-statutory guidance note states " <i>Regional Plans should implement state policies by specifying broad policy settings that promote liveable urban form/design.</i> " (p. 31)	The reference to " <i>specifying broad policy settings</i> " is unclear. No definition has been given to what constitutes a "broad" setting - and what the particular "setting" refers to. In addition, it is suggested that a further guidance note is added, to the effect of " <i>Regional Plans should consider the integration of biodiversity corridors and connected urban green spaces into land use planning at all scales.</i> "
20.	In Policy 5 (Climate Change), a non-statutory guidance note states " <i>Policies should...improve and increase land in the public realm</i> " (p. 31)	It is unclear how land in the public realm would be increased (through the planning system). Council seeks that this guidance note be clarified.
21.	In Policy 6 (Housing Supply and Diversity), it states " <i>1. Enable the provision of a well-designed, diverse and affordable housing supply that responds to population growth and targets, and the evolving demographics and lifestyle needs of our current and future communities</i> " (p. 36)	There are four aspects of this policy that may require further consideration: (1) The reference to " <i>evolving demographics and lifestyle needs</i> " presumably includes notions of facilitating ageing in place. To add more clarity to this intention, one suggestion is to make reference to national best-practice documents such as the <i>Liveable Housing Design Guidelines</i> . ⁵

⁴ Perini, K. (2016) *Green and Blue Infrastructure in Cities*. Available <https://onlinelibrary.wiley.com/doi/abs/10.1002/9781119245025.ch1>

⁵ Liveable Housing Australia (2012). *Liveable Housing Design Guidelines*. Available http://liveablehousingaustralia.org.au/library/help/Livable_Housing_Design_Guidelines_Web1.pdf

#	Citation	Comment
		<p>(2) Arguably, there are some existing suburbs which could be viewed as 'demographically dormant' i.e. established areas with little demographic turnover (and less opportunities for young families to move in). If this policy can also facilitate more creative arrangements for varied demographics, it could produce positive results for local communities.</p> <p>(3) It appears that design matters should take greater care in providing for natural light (within apartments or large dwellings on small blocks), and private open space. In some respects, these have become a neglected design aspect of infill development.</p> <p>(4) The design/placement of automatic garage doors/roller doors (especially for infill development on narrow blocks) tends to have encouraged a more insular design where occupants have relatively fewer opportunities for incidental discussion between neighbours.</p> <p>There may be overlaps with this policy and the pursuit of the 'missing middle' housing types that are discussed in the <i>30-Year Plan for Greater Adelaide</i>.</p>
22.	<p>In Policy 6 (Housing Supply and Diversity), it states "<i>5. Provide a permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.</i>" (p. 36)</p>	<p>There are two aspects of this policy that may require further consideration:</p> <p>(1) The reference to "aged care" implies a narrower concept of supported accommodation, as opposed to a broader concept of "age friendly accommodation" - it is unclear if the policy should refer to the broader of the two concepts.</p> <p>(2) The terms "<i>permissive and enabling</i>" could be interpreted to facilitate infill development that is potentially generic (in its design) and indiscriminate (in its spatial location). In the current planning system, local communities have expressed concerns with uncoordinated infill development, which is undertaken with a lack of consultation at the development assessment stage.</p> <p>Accordingly, Council seeks that the words "permissive and enabling" and "small lot" be removed.</p>
23.	<p>In Policy 6 (Housing Supply and Diversity), it states "<i>6. Increase the amount and diversity of residential</i></p>	<p>It is unclear whether a policy of this nature ought to be limited to Adelaide City; previous Ministerial Development Plan Amendments have shown a trend towards</p>

#	Citation	Comment
	<i>accommodation in Adelaide City to support a variety of household types for a range of age and income groups, including students, professionals and the ageing.</i> " (p. 36)	diversified residential accommodation in inner metropolitan suburbs (beyond the CBD). If this trend is to continue, it may be worth expanding this policy, to apply to inner metropolitan areas as well.
24.	In Policy 9 (Employment Lands), the introductory text states " <i>It is therefore vital to ensure the availability of a diverse range of well-serviced and strategically located employment lands to maximise certainty for the community and provide greater security for investment.</i> " (p. 44)	While this statement is supported, the term "employment lands" has not been defined. It is unclear what specifically this refers to; at a minimum, it presumably refers to industrial and commercial areas - notwithstanding that residential areas may also employ thousands of people (who work from home). It is suggested that greater clarity is given for this term.
25.	In Policy 11 (Strategic Transport Infrastructure), it states " <i>4. Support the long-term sustainability and management of transport assets and the various modes that use these assets.</i> " (p. 51)	It is unclear whether the sustainability reference is operational or environmental; in the case of the AdaptWest region (i.e. Cities of Port Adelaide Enfield, Charles Sturt, and West Torrens) contains state-significant transport infrastructure, including Adelaide Airport, Outer Harbor, and the North-South Corridor. This infrastructure would also be vulnerable to climate change impacts, which ideally would be monitored over time. It is suggested that a reference to monitoring be considered, alongside the existing references of sustainability and management.
26.	In Policy 11 (Strategic Transport Infrastructure), it states " <i>5. Minimise negative transport-related impacts on communities and the environment.</i> " (p. 51)	This policy seeks to minimise negative transport related impacts on communities (which is supported), although it may conflict with other policies to expand and intensify strategic transport infrastructure for passenger and freight movements. It also seems that some transport networks have limited physical capacity for expansion (e.g. for road widening). The effects of this policy may need to be further considered.
27.	In Policy 11 (Strategic Transport Infrastructure), it states " <i>6.Enable and encourage the increased use of a wider variety of transport modes including public transport, walking and cycling to facilitate a reduced reliance on private vehicle travel.</i> " (p. 51)	While this policy is supported, it does not explicitly mention the expansion and provision of walking or cycling facilities or networks; the expression could be adjusted to reference networks (in addition to modes).
28.	In Policy 11 (Energy), it states " <i>5. Ensure renewable energy technologies support a stable energy market and continued supply and do not adversely affect the amenity of regional communities</i> " (p. 54)	This policy is supported as a springboard for further investigation, though it is not entirely clear how the planning system will influence the development of technologies per se; presumably the role of policy sits beyond the planning system, and will be driven by the <i>Electricity System Development Plans</i> developed by SA Power Networks.

#	Citation	Comment
29.	In Policy 13 (Coastal Environment), it states " <i>4. Locate development in areas that are not subject to coastal hazards unless the development requires a coastal location and suitable hazard mitigation strategies are in place, taking into account projected sea level rise and coastal retreat.</i> " (p. 58)	In some instances, coastal development would be inappropriate, including where coastal 'retreat' needs to be considered as a planning response to sea level rise and other hazards.
30.	In Policy 14 (Water Security and Quality), the Objective states " <i>South Australia's water supply is protected from the adverse impacts of development.</i> " (p. 60)	While the intent of this objective is supported, it is suggested that reference also be made to water-dependent ecosystems being protected from the adverse impacts of development
31.	In Policy 15 (Natural Hazards), it states " <i>1. Identify and minimise the risk to people, property and the environment from exposure to natural hazards including bushfire, terrestrial and coastal flooding, erosion, dune drift and acid sulphate soils.</i> " (p. 62)	As Adelaide is the most earthquake-prone capital city in Australia, it is suggested that reference is added to earthquakes (thereby complementing the specific construction requirements of the National Construction Code)
32.	In Policy 16 (Emissions and Hazardous Activities), it states " <i>1. Ensure our communities and the environment are protected from risks associated with emissions and radiation activities while ensuring that industrial and infrastructure development remains viable through... Avoiding establishing incompatible land use interfaces through encroachment on industrial sites by maintaining adequate separation distances</i> " (p. 64)	This policy is supported

Comments on the policies as a whole

#	Applicable Policy	Comment
33.	(Throughout)	<ul style="list-style-type: none"> Several policies are considered by be too "city-centric" for a statewide document. The prioritising of Adelaide City Council, for instance, as an area of adaptive reuse (when arguably many areas throughout the state could equally benefit from reuse)

#	Applicable Policy	Comment
		<ul style="list-style-type: none"> • The policies are generally lacking in a discussion and appreciation of public open space, notwithstanding an intention for increased densities and the like. • With regard to risk management, the entrenched ability to subdivide urban properties is counter-productive to the management of climate change risks, and associated events like flooding and heatwaves. In some respects, the intent for urban regeneration may conflict with avoiding increased urban heat island effects and stormwater run-off.

Omissions from (and potential additions to) individual policies

#	Applicable Policy	Comment
34.	State Planning Policy 2: Design Quality	<p>This policies would benefit from including reference to the acoustic performance of housing, in the context of:</p> <ul style="list-style-type: none"> • Housing with no side setbacks (Council is in possession of a post-occupancy survey of Lightsview conducted in 2017. In this survey, 26% of people were dissatisfied or very dissatisfied with privacy between homes (either visually or for sound proofing); • Housing adjacent to main roads or industrial areas; and • Mixed use precincts, and activities with 24-hour operations.
35.	State Planning Policy 3: Adaptive Reuse	<p>This policy may benefit from including reference to the following:</p> <ul style="list-style-type: none"> • Facilitating and encouraging the adaptation of buildings with cultural significance that are not heritage listed; and • Prioritising the adaptive reuse of disused buildings within industrial precincts (such as the Woolstores precinct of Port Adelaide).
36.	State Planning Policy 5: Climate Change	<p>This policies would benefit from including reference to the following:</p> <ul style="list-style-type: none"> • Acknowledging the impacts of climate change at smaller regional and local scales, given that climate change impacts are not geographically uniform across the state; • Addressing consideration of natural ecosystem impacts e.g. ecological adaptation corridors/retreat areas;

#	Applicable Policy	Comment
		<ul style="list-style-type: none"> • Facilitating phased relocation of assets and infrastructure away from high risk areas; • Recognising the importance of land division layouts in setting opportunities for climate sensitive design (before getting to Building Code solutions); • Ensuring appropriate land use zoning and planning provisions to support renewable energy generation (as distinct from the current reference to green technologies); • Regional Plans should consider the integration of biodiversity corridors and connected urban green spaces into land use planning at all scales; • Planning & Design Code Overlays that identify areas of strategic importance in biodiversity conservation and urban greening, when new proposing new development; • Related legislation and instruments being the <i>Natural Resources Management Act</i> (or <i>SA Landscape Act</i> when proclaimed), <i>National Environment Protection Act</i>, and <i>Conservation Act</i>.
37.	State Planning Policy 6: Housing Supply and Diversity	<p>This policies would benefit from including reference to:</p> <ul style="list-style-type: none"> • Encouraging a culture of good design thinking to tackle social problems of homelessness through intragovernmental partnerships and creative thinking
38.	State Planning Policy 7: Cultural Heritage	<p>On the whole, this policy is considered to be rather short, and the reasons for this are unclear. Therefore, the policies would benefit by including reference to the following:</p> <ul style="list-style-type: none"> • Contributory Items (as listed in existing Council Development Plans); and • Policies for new buildings developed adjacent to existing heritage places.
39.	State Planning Policy 11: Strategic Transport Infrastructure	<p>The policies would benefit from including reference to the following:</p> <ul style="list-style-type: none"> • Increased focus on mobility, as opposed to accessibility <i>per se</i> (e.g. by considering policies around future expansion and intensification of strategic transport corridors for passenger freight movements); • More of a focus on operation, maintenance and provision of services, beyond the existing provisions of building more public transport and freight routes; • Frequency of public transport services, along with maintenance and upgrading of existing road infrastructure; and

#	Applicable Policy	Comment
		<ul style="list-style-type: none"> • More emphasis on congestion management.
40.	State Planning Policy 12: Energy	<p>Some of the policies are predisposed to deal with energy supply considerations, in preference to energy demand management. The policies would benefit from including reference to the following:</p> <ul style="list-style-type: none"> • Ensuring energy efficiency and water efficient urban and building design (through the Planning & Design Code) to reduce energy demand and costs; and • Planning & Design Code Overlays to identify the energy distribution networks and infrastructure needed to support development.
41.	State Planning Policy 13: Coastal Environment	<p>For the coastal environment, this is a field of significant scientific endeavour, and the appropriateness of development needs to be properly informed by that expertise as part of the development of policies, and the assessment of development. On the whole, the policies may need to better reflect the importance of development not negatively impacting on the marine environment (to counterbalance existing references to terrestrial environments).</p> <p>The commentary would benefit from including reference to:</p> <ul style="list-style-type: none"> • The identification of coastal retreat areas, along with any other identified hazards for given areas; • Protecting the marine environment from negative impacts emanating from land-based development; • Regional Plans to consider identifying the location of marine and aquatic sanctuaries • The role of the Planning and Design Code to protect coastal and marine environments from pollution and other negative impacts; and • The related legislation to refer also to the <i>Adelaide Living Beaches Strategy</i>, <i>Natural Resources Management Act</i> (or <i>SA Landscape Act</i> when proclaimed); <i>Environment Protection Act</i>, <i>Adelaide Coastal Water Quality Improvement Plan</i>.
42.	State Planning Policy 14: Water Security and Quality	<p>On the whole, the policies may need to strengthen their referencing to water reuse (including alternative water sources), and water efficiency. For the latter, a demand management approach may be somewhat lacking, as the policy feels skewed to water supply issues. Also, the policy may need further consideration in terms of protecting of</p>

#	Applicable Policy	Comment
		<p>water dependent ecosystems, and ensuring that environmental flows in catchments are maintained. The policies would benefit from including reference to:</p> <ul style="list-style-type: none"> • Exploiting opportunities for alternative water sources (to supplement mains water sources); • Ensuring water efficiency urban and building design to reduce water demand; • Regional Plans to identify water dependent ecosystems that require protection from new development; • Planning & Design Code overlays to identify water dependent ecosystems and habitats of conservation significance (e.g. Ramsar Wetlands, Adelaide International Bird Sanctuary); and • The related legislation to refer also to the <i>Natural Resources Management Act</i> (or <i>SA Landscape Act</i> when proclaimed); <i>National Environment Protection and Conservation Act</i>.