



OFFICE OF THE LORD MAYOR

Tony Shepherd AO
Chair
Infrastructure SA
GPO Box 2343
ADELAIDE SA 5001

Dear Mr Shepherd 

I welcome this opportunity to provide input to the creation of the 20-year Infrastructure Strategy (the Strategy) for South Australia on behalf of the City of Adelaide.

Infrastructure has a critical role in unlocking the potential of South Australia. I recognise the pivotal role of the City of Adelaide to help to establish a long-term, integrated and effective infrastructure plan for South Australia.

I am particularly pleased that Infrastructure SA (ISA) has adopted a broad definition of infrastructure to ensure that all forms of physical infrastructure that support the activities of the economy and social systems are considered.

As South Australia's capital city, it is important for the City of Adelaide to be closely involved with the creation of the Strategy. It is critical for infrastructure to be planned and designed to enable effective short and long-term decision-making as we work to refine and update our Council's strategic direction and targets.

I see benefit in achieving a close strategic alignment between the City of Adelaide and Infrastructure SA to achieve effective coordination of infrastructure planning and delivery.

Council has a wealth of feedback and information to assist with the Strategy's development. Our preliminary advice is attached. We seek ongoing collaboration with ISA to further research and refine our feedback.

Klinton Devenish, Director – Place would be pleased to discuss this submission with you in more detail. Please contact Bronwyn Taylor on 8203 7465 to arrange a time.

Yours sincerely

[DELETED]

Sandy Verschoor
LORD MAYOR

31 July 2019

Attachment A

Attachment A – Preliminary Advice

Discussion Paper Questions

1. What infrastructure investment would make the biggest impact to unlocking economic growth in South Australia in the next 0-5, 5-10 and 10-20 years?
2. How would Adelaide's infrastructure need to change if its population hit two million?
3. What strategies should be adopted to ensure Adelaide maintains its liveability as it grows?
4. How can technology and data be embraced to improve quality of life?
5. How can South Australia best prepare its infrastructure to be able to adapt to and embrace future technological disruptions?
6. How should infrastructure be planned in increasingly urban environments with ageing populations?
7. How can infrastructure provide resilience against bushfires, drought, flooding, sea level rises and the like?
8. What strategies should the Government adopt to ensure the necessary infrastructure is in place so our regions can thrive?
9. What factors should be considered when making inevitable trade-offs about investment in public infrastructure in the context of funding constraints?
10. How can we best plan and accommodate the infrastructure needed to create vibrant and economically productive precincts?
11. How can South Australia better manage demand on current infrastructure?
12. What opportunities are there to better leverage private investment to drive public infrastructure development?
13. What challenges and opportunities does South Australia have in supporting our cultural, sporting and tourism activities to ensure our global competitiveness and vibrancy as a location?
14. What services are we likely to use in the future that will require supporting digital infrastructure?
15. How will changing delivery models in education and training impact infrastructure requirements?
16. What complementary infrastructure can be built to support better health outcomes across the population?
17. What infrastructure is required to support our justice system and emergency services across the state?
18. How will technology change the transport system in South Australia?
19. How can South Australia take the lead on reducing emissions from transport?
20. What options are there to establish a reliable, affordable, decarbonised energy system in South Australia?

Preliminary Advice

The City of Adelaide has a wealth of feedback and information to assist with the 20-Year Infrastructure Strategy's development and in response to the Discussion Paper questions.

Key factors to consider from the perspective of the City of Adelaide during the preparation of the 20-Year Infrastructure Strategy include:

- Well-coordinated and targeted planning is essential for future infrastructure to support population growth in the City. Improvements in the management of existing infrastructure are key to realising long-term benefits and cost-effectiveness.
- The infrastructure strategy should be designed to support and achieve improved health, education, cultural, environmental and business outcomes and targets consistent with the State Planning Policies, and the 30-Year Plan for Greater Adelaide.
- The "City of Adelaide 2016-2020 Strategic Plan" includes key directions on infrastructure for the City of Adelaide which should inform and be incorporated into the 20-year Infrastructure Strategy.
- Rethinking what attracts people to a regional city such as Adelaide requires consideration of different perspectives, innovation, liveability, cost, quality lifestyles. Our future approach to infrastructure should be responsive to such thinking.

- Arts and culture and events infrastructure is needed for the City, for example a new music hall venue, and ensuring our public spaces have embedded power, water and sewage access.
- Coordination and planning is essential, because a liveable city does not simply happen by building a certain number of apartments – it requires the planned integration of accessible schools, playgrounds, hospitals, and other social and physical infrastructure to support our changing population.
- City of Adelaide has recognised the need for a social infrastructure plan for the City and has commenced investigations to inform this. Council will seek to understand how the State intends to provide education infrastructure to a growing city and inner suburbs resident population as part of this process.
- SA needs to improve the mechanisms for coordination and governance of place-based infrastructure planning and provision. This is consistent with Infrastructure Australia's recent *Planning Liveable Cities* report (December 2018) recommendation that more place-based infrastructure planning (including for social infrastructure) is required for liveable communities. Local Government is a key partner in development of place-based solutions to infrastructure needs.
- It would be prudent for the State Infrastructure Plan to also recognise the key role and contribution of Local Government to the planning and delivery of infrastructure, including the social infrastructure that provides essential foundations for cultural vitality and cohesive, healthy and prosperous communities.
- Transport infrastructure opportunities exist, as described in the City of Adelaide Strategic Plan, including delivering priority walking and cycling routes throughout and beyond the City and Park Lands. Opportunities also exist to provide additional light rail connections, and to improve the City Ring Route to resolve issues associated with road safety, capacity and pedestrian and cyclist access. The City Access Strategy is a key opportunity to inform the 20-Year Infrastructure Strategy.
- City of Adelaide is preparing a City Plan which will need to interact with the Infrastructure Strategy.
- Future-proofing our City and State from the risks posed by climate change is important. Our infrastructure investments must seek to prevent, as well as provision for such risk. Our City has worked comprehensively with State Government, community and private sector to achieve this and seek to share these learnings during the development of the Strategy.
- Infrastructure should be considered through the lens of providing quality services, such as open space resources, dynamic commercial precincts and exciting cultural opportunities to help attract and support the growth we seek in the City.
- Planned and well-managed infrastructure will enable efficient investments by all levels of government, the private sector and our existing and future communities.

Council recently provided detailed feedback to State Government as part of the current planning reforms. Council's response to the Draft State Planning Policies, the Productive Economy, Integrated Movement Systems and Natural Resources and Environment discussion papers are enclosed for your information (Attachments B, C and D). A copy of Council's recent response to the SA Arts Plan is also enclosed (Attachment E).

The City of Adelaide has a wealth of feedback and information to assist with the 20-Year Infrastructure Strategy's development. We seek ongoing collaboration with ISA to further research and refine our feedback.

Additional detailed comments in response to the questions posed by the Discussion Paper include:

- The investment and funding profile of Adelaide needs to be better understood to inform this strategy
- Opportunities to unlock economic growth in SA include an airport train/light rail, better connectivity to eastern states, water security, and rethinking what attracts people to a relatively small, regional city
- If Adelaide's population reaches 2 million, we would need to increase social infrastructure to support higher densities, and also plan for food security, water security and respond to climate change
- To ensure liveability as Adelaide grows, we should have a single City Plan that connects land use, transport and infrastructure needs, including 10-20 min walkable communities to reduce

demand on infrastructure, and increase resilience to climate change impacts and heat in Greater Adelaide and the City

- Technology data could be embraced to improve quality of life to enable people to age in place and assist those with mobility needs
- Improved integration and analysis of data is required
- Comprehensive research is needed on what other global cities are doing to adapt to and embrace future technological disruptions
- To address increasingly urban environments with ageing populations there is a need to consider that centralising services may not always be conducive to an accessible/walkable environment. It is therefore necessary to plan infrastructure for the full range of ages “8 to 80-year olds”
- Key infrastructure resilience issues include considering the impact that climate change has on the useful life of infrastructure, as well as including this in risk assessments.
- There are real limits to the ability of Councils to fund necessary infrastructure and this needs to be addressed as a priority
- Key services provided by green and blue infrastructure, including trees and vegetation need to be valued more highly and managed accordingly
- Efficient use of existing infrastructure requires investment in upgrades and expansions of existing infrastructure, however this is problematic because this typically isn’t viewed as a key “announcable” by most governments. It is necessary to find a way to recognise and value systems improvements, not only large capital programs.
- Prioritising infrastructure which supports preventative health outcomes is needed, as is the need to consider the impacts of accessibility and health from large projects such as South Road, or Park Terrace
- Mode shift is needed instead of only expanding vehicular road carrying capacity e.g. infrastructure to enable public transport, cycling, walking infrastructure is needed
- Local government needs to be involved as a partner to ensure efficient use of existing infrastructure – better coordination between State and Local government is needed
- SA could better manage demand on current infrastructure by improving our understanding of infrastructure utilisation and capacity.
- Private investment: little priority has been given to-date in the roll-out of new planning system on understanding the new infrastructure tools. Utilisation of value-capture and developer contributions could also be done better in SA.
- An indoor sports court complex is needed in the City to service the population of the City (futsal/soccer/basketball/netball/volleyball)
- Cultural, sporting and tourism facilities need to be climate ready – extreme heat will impact infrastructure and impact on attendances e.g. tour down under
- Improved connectivity to recreational infrastructure is needed to support better health outcomes across the population
- Quality green infrastructure should be protected and enhanced and provisioned for where absent
- Improved data security, and review of current CCTV network will support our justice system and emergency services across the state. The current CCTV network has an aged platform infrastructure and requires investment.

Attachment B



OFFICE OF THE LORD MAYOR

Mr Tim Anderson QC
Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Dear Mr Anderson,

RE: Response to Draft State Planning Policies

The City of Adelaide values and appreciates the opportunity to comment on the Government's "Draft State Planning Policies" which set the policy directions intended to be effected through the spatial planning system.

Council recognises that these policies will form the highest order policy document in South Australia's planning system and congratulate the Government on preparing a robust and comprehensive suite of policies for consultation.

To provide context, I draw your attention to the Government's bipartisan directions for Planning Reform which were agreed upon in 2015 in response to the final report and recommendations of the Expert Panel on Planning Reform. In relation to "*Reform 5 - Create in legislation a new framework for State Directions*", the intended planning reform was for State Planning Policies to:

- *"Facilitate a clear line of sight from state-wide Government priorities and policies to on-ground decisions and actions;*
- *Help resolve persistent issues such as integration of natural resource management and affordable housing policies into the planning system; and*
- *Enable the simplification and rationalisation of other statutory and non-statutory policy document."*

Council's response to the Draft State Planning Policies has been prepared following consideration of the SPPs, with consultation across Council's administration, with feedback from elected members and with an understanding of our community's perspectives and aspirations.

I am concerned that the Draft State Planning Policies, in their current form, lack sufficient elucidation of the Government's vision to provide a "clear line of sight".

I am also somewhat disappointed that initial community engagement on the State Planning Policies has not occurred in the spirit of the Act's "Community Engagement Charter" to enable, encourage and value community and business input into the policy creation stage, rather than during development assessment.

Specific feedback on individual Draft State Planning Policies is provided in the attached Table 1, however key comments include:

Opportunities to Strengthen the State Planning Policies

The State Planning Policies could be strengthened by:

- More effectively communicating an integrated state-wide vision and commitment to providing a spatial structure for future growth.
- A commitment to ensuring affordable housing targets result in the provision of housing for those in need and significantly reduce homelessness.
- Better integration of natural resource management into the planning system.
- Explicit inclusion of the key role of waste management in planning and development.
- Explicit inclusion of social infrastructure within the definition of infrastructure to ensure the social infrastructure required by communities, such as schools, community facilities, etc. is provided via planning and development mechanisms.
- Strengthening the requirement for Universal Design to be embedded within and across all policies.
- Further consideration of whether the State Planning Policies will achieve the stated targets.

Policy 1 – Integrated Planning

- There is a key opportunity to more explicitly require integration across all State Planning Policies.

Policy 2 – Design Quality

- Policy 2.2 should “ensure” rather than simply “promote” best practice in access and inclusion planning in the design of buildings and places.
- A new policy should be created to focus explicitly on Water Sensitive Urban Design, Environmentally Sustainable Design-- these topics appear to be incorrectly located within a policy on access and inclusion.
- Specific requirement for planning and development to be specifically designed to minimise and mitigate climate change is needed within this suite of policies.
- Consider whether building safety is adequately embedded within the State Planning Policies.

Policy 3 – Adaptive Reuse

- Additional research should be undertaken by State Government to more clearly define the problem and clearly define the interventions that are being sought from planning system.

Policy 5 – Climate Change

- Some mechanisms and tools need to be mandated in order to achieve targets in an effective timeframe.

Policy 6 – Housing Supply and Diversity

- Specific reference to Universal Design is essential.
- A commitment to ensuring affordable housing targets result in the provision of housing for those in need and significantly reduce homelessness

Policy 7 – Cultural Heritage

- There is considerable opportunity to revise and strengthen this policy as noted in the attached table, including:
 - the need for a specific focus on built heritage, fostering cultural vitality, protecting cultural landscapes, and
 - opportunities to work with First Nations peoples to undertake cultural mapping to understand cultural heritage sites and areas of significance.

Policy 9 – Employment Lands

- Maintaining and reinforcing retail in the City of Adelaide is a vital element of the State Planning policy and needs further emphasis, to maintain the primacy of the City of Adelaide as a highly accessible hub with a growing residential population and with a key role for visitors, workers and tourism.

Policy 11 – Strategic Transport Infrastructure

- The wording of policy 11.3 is ambiguous and could be clarified to determine if it is intended to promote “equity of access to transport infrastructure and services for communities” or “equitable contributions to transport infrastructure and services by developers”.
- Policy 11.2 should place greater emphasis on encouraging active transport modes to realise significant community, health, economic and environmental benefits.

Policy 12 – Energy

- This policy should explicitly seek to achieve greenhouse gas/emission reductions to mitigate climate change impacts and minimise short- and long-term risks.

Policy 13 – Coastal Environment

- This policy is designed to protect and enhance the coastal environment, and could be enhanced via better recognition of the cumulative impact of development on coasts from upstream development. The City of Adelaide Strategic Plan seeks to improve the ecological value of watercourses and biodiversity in the Park Lands, and seeks to reduce stormwater runoff and pollution into the River Torrens through integrated catchment management and water sensitive urban design.

The City of Adelaide has much value to add to the Commission and the Government’s vision and process. As such, I invite the you to meet me to share the Council’s concerns and convey the feedback received from the city community, in the spirit of working towards an improved approach to work collaboratively to progressively implement Planning Reforms in South Australia.

Yours sincerely

[DELETED]

Martin Haese
LORD MAYOR

12 September 2018

RESPONSE TO DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

Table 1 Comments on Draft State Planning Policies for South Australia

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
GENERAL COMMENTS	<p>Overall, the combined State Planning Policies will enable the achievement of many of the City of Adelaide Strategic Plan's "Smart, Green, Creative and Liveable" Objectives and associated actions. This document highlights potential gaps and improvements that should be made to the Draft State Planning Policies.</p> <p>Vision</p> <p>The overall suite of policies could benefit from more compelling communication of an overall vision and purpose for the state.</p> <p>State Planning Policies/Regional Plan</p> <p>Consideration could be given to the most appropriate "level" of State Planning Policies.</p> <p>Overall the policies are considered to be sufficiently "enabling", and more detailed policy direction will be expressed at a "Regional Plan" and "Planning and Design Code" level.</p> <p>The existing 30 Year Plan for Greater Adelaide will serve as the interim "Regional Plan" for the City of Adelaide, however the next level of policies – the Planning and Design Code – will be prepared and operating before any new Regional Plan is developed.</p> <p>There is an opportunity for the new Regional Plan, when developed, to provide a greater level of direction and support for integrated planning than the 30 Year Plan for Greater Adelaide currently provides.</p>

	<p>Gaps</p> <p>Recognising there are many considerations relating to planning and development across the state and that the draft policies go a long way to attempting to provide certainty and balance sometimes disparate objectives, it is noted that there may be some potential gaps. These gaps include:</p> <ul style="list-style-type: none"> • A need to communicate a state-wide vision and commitment to providing a spatial structure for future growth. • Affordable housing targets and a commitment to ensuring they result in the provision of affordable housing to those in need. • There is an enormous opportunity to encourage world-leading and effective waste and recycling practices in planning and development in South Australia, which is currently omitted from the draft policies. Effective and innovative waste management is important in the City of Adelaide (transport, noise, storage, reuse, recycling, resource recovery, clean tech, air and water quality, community amenity, business efficiency etc.). • Opportunities for interaction between the PDI Act and other current and proposed legislation, particularly with respect to referrals and shared objectives. • Strengthening the expectation for coordinate with existing and future government department strategies and operations, and integration between the 16 policies. • Potential consideration of how to resolve conflicts between competing State Planning Policies at the Regional Planning stage, rather than at the development assessment stage. • There may also be potential to include an additional policy, to fast-track achievement of the stated target “A green liveable city – urban green cover is increased by 20% in Metropolitan Adelaide by 2045”. • Other gaps and opportunities in the Draft Policies are discussed against the relevant policy in this table.
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Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>Editorial Suggestion</p> <p>Sub-policies could be numbered to enable easy reference to “lead policy” e.g. Policy 13.3 instead of Policy 13, dot point 3 enable easy reference.</p> <p>Aligns with City of Adelaide Strategic Plan 2016-2020 strategic objectives in relation to the green theme.</p> <p>How to interpret the SPPs</p> <p>It is noted on p.10 that Parts 3 and 4 of the document form a statutory function, however the table immediately below does not highlight this – this inconsistency should be amended to ensure the reader understands that “Part 3 – Principles of Good Planning” and “Part 4 – Our Targets” have a statutory function.</p>
<p>PRINCIPLES OF GOOD PLANNING</p>	<p>Principles of Good Planning should include "Responding to climate change" under Sustainability Principles. This language is used under the Draft State Public Health Plan. "Particular effort ... that respond to climate change and address implications of climate change".</p>
<p>TARGETS</p> <p>The Targets included in the Draft State Planning Policies are consistent with the 30-Year Plan for Greater Adelaide 2017 Update.</p> <ol style="list-style-type: none"> 1. Containing our urban footprint and protecting our resources <ol style="list-style-type: none"> 1.1 85% of all new housing in metropolitan Adelaide will be built in established areas by 2045 1.2 90% of all new housing in Outer Greater Adelaide will be built in the established townships and designated urban development areas. 	<p>The legislated and/or intended timeframe for updating targets should be stated in the SPP document.</p> <p>It is assumed that these targets will be tracked, and further information on how this will be achieved will be forthcoming as the Planning Reforms are progressively implemented.</p> <p>The City of Adelaide is specifically referenced in the proposed targets, however the overall success of the whole state is important to the City. If statewide targets would be useful then these should be incorporated also, either now, or as part of the creation of revised regional plans.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>1.3 85% of all new housing in regional South Australia will be built within townships and defined settlements.</p> <p>2 More ways to get around 60% of all new housing (in) metropolitan Adelaide will be built within close proximity to current and proposed fixed lines (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045.</p> <p>3 Getting Active The share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide will increase by 30% by 2045.</p> <p>4 Walkable Neighbourhoods Increase the percentage of residents living in walkable neighbourhoods in Inner, Middle and Outer Metropolitan* Adelaide by 25% by 2045. *Established urban areas, including townships in Outer Metropolitan Adelaide.</p> <p>5 A Green Liveable City Urban green cover is increased by 20% in Metropolitan Adelaide by 2045.</p> <p>6 Greater Housing Choice</p> <p>6.1 Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045.</p> <p>6.2 Housing choice in regional cities and towns will increase by 10% to meet changing household needs in regional South Australia by 2045</p>	
State Planning Policy 1 – Integrated Planning	
<p>Objective: Integrated planning is an essential approach for liveability, growth and economic development, maximising the</p>	<p>Supported, noting that planning and development in the City of Adelaide, as well as across South Australia will need to balance each of the State Planning Policies and</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>benefits and positive long-term impacts of development and infrastructure investment.</p>	<p>it is assumed that they will not be used in isolation of each other during future regional planning, preparation of the Planning and Design Code, and other uses of the State Planning Policies as anticipated by the <i>Planning, Development and Infrastructure Act, 2016</i>.</p> <p>Although the SPPs will not be used during development assessment (other than to inform the creation of the relevant assessment instruments), it is noted that the State Planning Policies will also be referenced in relation to Environmental Impact Assessments, special legislative schemes such as designated Character Preservation Areas (Barossa and McLaren Vale), basic and general infrastructure schemes, and are also referenced by the <i>Urban Renewal Act 1995</i> (in relation to establishment of precincts and precinct plans)</p> <p>It is also important that 'infrastructure' is understood broadly to include the social infrastructure that communities require, not just the physical infrastructure systems (roads, waste, energy, water etc). This is not clear from the definitions and use of the word 'infrastructure' across the SPPs. A useful definition of social infrastructure might be found on page 7 of 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</p> <p>This objective aligns with the City of Adelaide's City of Adelaide's strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.</p>
<p>Policy 1.1: Plan growth in areas of the state that are connected to, and integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions.</p>	<p>Supported, noting that this policy could be clarified by including specific reference to residential and community growth (or urban growth), if this is what is intended.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>To what extent has the State's Integrated Transport and Land Use Plan been considered and what its future role will be.</p> <p>Will this policy protect long-term forward planning for proposed transport routes?</p>
<p>Policy 1.2: Ensure that areas of rural, landscape, environmental or food production significance within Greater Adelaide are protected from urban encroachment as provided for by the Environment and Food Production Areas legislation.</p>	<p>Supported, and this policy needs to complement policy 1.1.</p> <p>Of relevance, the City of Adelaide Strategic Plan seeks to "advocate for an urban growth boundary that limits urban sprawl and promotes the City as the commercial, cultural, residential and social heart of metropolitan Adelaide".</p>
<p>Policy 1.3: Provide an adequate supply of land outside the Environment and Food Production Areas that can accommodate housing and employment growth over the relevant forecast period. Based on current dynamics, the relevant forecast period is considered to be 10 years.</p>	<p>Supported, with the following comments:</p> <ul style="list-style-type: none"> • this policy needs to link with policy 1.1 above to ensure orderly and economic development, and • This policy relates to greenfields development, however this should also be balanced with well-planned redevelopment of already developed areas to help achieve other SPP objectives, such as primary industry, protection of key resources, provision of well-located employment lands, adaptive reuse, housing supply and diversity and strategic transport infrastructure.
<p>Policy 1.4: Manage growth in an orderly sequence to enable the cost-effective and timely delivery of investment in infrastructure commensurate with the rate of population growth into the future.</p>	<p>Supported, with the following edits:</p> <p>"Manage growth in an orderly sequence to enable the cost-effective and timely delivery of investment in infrastructure, services and facilities commensurate with the rate of population growth into the future."</p> <p>Shocks and disruptions to South Australia e.g. caused by climate change, extreme weather events, global events, may disrupt such an orderly approach. State-coordinated resilience planning may assist this. The inclusion of ongoing resilience planning into the SPPs could assist "future-proofing" our state and the City of Adelaide.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>Policy 1.5: Plan for urban growth to protect and preserve opportunities for high value horticulture, tourism and landscape character areas.</p>	<p>This policy appears to reinforce and potentially duplicate 1.2 and 1.3.</p> <p>Reword to “Ensure urban growth protects and preserves opportunities....” Possibly also include the words “and enhance/add to”</p>
<p>Policy 1.6: Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.</p>	<p>Supported. This policy could also be improved by direct reference to supporting and/or enabling communities to thrive, and could strengthen reference to timely provision of social infrastructure. This policy will also support achievement of City of Adelaide’s Strategic Plan’s objective of being listed in the top three most liveable Cities in the World by 2020.</p>
<p>Policy 1.7: 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>	<p>Supported, with the following comments:</p> <ul style="list-style-type: none"> • Assume “housing choice” refers to the provision of a variety of housing types. • Encouraging greater use of active transport should not be limited to activity centres, public transport nodes and strategic transport corridors. • reduced car ownership and reduced car parking may also result in an increase in need for delivery services for some occupants and this may need to be considered strategically. Edit the policy to include “open space” as follows: <p>1.7: Support housing choice and mixed-use development around activity centres, open space, 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>
<p>Policy 1.8: 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>	<p>There is a need to conduct further planning and research to validate this approach to support effective and integrated planning within the City of Adelaide, recognising that higher density living, building cohesive communities and business infrastructure requires a more intense level of integration and well-considered planning.</p> <p>Suggest change “can be managed” to “are managed”.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>Ensure access to the Park Lands is not compromised by 'travel routes' that negatively impact on high-rise living where it frames the Park Lands (e.g. the development of Bowden Village and the city by pass along Park Terrace is counterproductive).</p> <p>Consider the impacts of high-rise living on population diversity and the health and wellbeing of the City community (isolation, emergency management, access to outdoor space, interaction with nature, etc) and plan accordingly.</p>
<p>Comments on non-statutory elements of SPP 1:</p>	<p>p.21 Diagram of urban settlement types – This diagram is confusing and overly simplistic – not really representative of the urban form of Adelaide. Why are the outer suburbs described as “car dependent”? Many city workers live in outer suburbs. If these are not serviced by public transport there are traffic /congestion impacts on Adelaide City as well as the suburbs surrounding Adelaide and key transport routes. Improved public transport services for outer suburbs should be part of state transport planning and would be consistent with Targets 2 & 3 of the SPP (p 16)</p> <p>p. 23 Non-statutory guidance notes for Integrated Planning - The Planning and Design Code should also require proponents of development to demonstrate that sufficient infrastructure, facilities and services are available (or can be provided) to facilitate integrated planning outcomes and well serviced communities. It is not sufficient to provide suitable zones. For example the cumulative impacts of infill development on available infrastructure and services need to be considered in planning processes to ensure liveability and quality of life is maintained and improved.</p> <p>p.27 Related Legislation and Instruments - Add Liquor Licencing Act and regulation regarding noise attenuation, Cultural Heritage Act, Native Title Act</p> <p>p. 34-35 Our People and Neighbourhoods - of the is an opportunity for more of the introductory material for the policies to be reflected in the policies themselves. People and Neighbourhoods is about more than housing and heritage.</p> <p>p 35, SPP 6.8, p 48, p 66 - Definitions of social infrastructure - There is an inconsistency in the language and definitions regarding social infrastructure,</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>community infrastructure, community facilities and services in the SPP that needs to be addressed.</p> <p>P 37 – Non-Statutory Guidance Notes for SPP6 - The Planning and Design Code will also need to ensure that services, infrastructure and facilities are coordinated with housing outcomes. Policies 6.2 and 6.8 will need appropriate expression in statutory policy so that they can be implemented.</p> <p>p. 40 - Our Productive Economy - This section does not address creative industries and the cultural economy. These make an important element in the City of Adelaide economy, and particularly relevant as the image selected for pp 40-41 is an iconic public art piece in the Central Markets. More is needed to address the contribution of planning to facilitating creative industries and cultural enterprise as per the City of Adelaide's Cultural Strategy.</p> <p>p. 48 - Our Infrastructure and Movement Systems - This section states that "The integration of infrastructure and land use planning will deliver benefits such as ... improved accessibility to social and physical infrastructure to improve our standard of living" but this is not reflected in the SPPs which only address strategic transport infrastructure and energy infrastructure.</p> <p>There is a critical policy gap around social infrastructure planning and provision to align with housing and development. For example g schools, community facilities, a range of services etc are required where there is greenfields development, as well as infill development. These services and facilities can lag a long way behind community needs if not well planned and integrated with development. Proactive planning and coordination of social infrastructure has been shown to deliver health and wellbeing benefits for communities, savings for government and land efficiencies for developers.</p> <p>Across the document - There is little evidence of integration of the needs and opportunities of Aboriginal communities across this document. Local Aboriginal communities have vested interests and contributions to make to policy delivery of all policies, and including policies relating to biodiversity, land management, economic development, tourism, cultural heritage. and mapping of cultural opportunities and considerations around social infrastructure</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
State Planning Policy 2 – Design Quality	
<p>Objective: The Principles of Good Design are embedded within the planning system to elevate the design quality of South Australia’s built and natural environment and public realm.</p>	<p>Supported, noting that there is potential for this policy to be more strongly worded to ensure this objective is met, however the broad principles are supported.</p> <p>The need to design “in context” should be strengthened.</p> <p>It will be important to reflect these policies carefully and effectively in the Planning and Design Code and applied to all development, from major buildings to sheds.</p>
<p>Policy 2.1: Ensure plans encourage development that incorporates the Principles of Good Design.</p>	<p>Supported, with the recommendation that “ensure” is replaced with “require”.</p>
<p>Policy 2.2: Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design, Access for All, Crime Prevention through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design.</p>	<p>Supported, noting that it should be edited to read “ensure” rather than simply “promote” best practice in access and inclusion planning in the design of buildings and places. The PDI Act has a significant focus on universal design to ensure accessible built environments and this should be reflected in stronger wording of the SPP 2.</p> <p><i>“Crime Prevention through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design”</i> should be moved to a separate policy because they are not the means to address best practice in access and inclusion planning in the design of buildings and places.</p> <p>Technical corrections to Policy 2.2 will require the creation of a new policy. This could focus on a requirement to integrated design of development, including environmentally sustainable design, water sensitive urban design, and consideration of managing heat island effect etc. This is important in the urban context for multiple reasons, including community well-being, climate change risk-mitigation, catchment water quality (e.g. River Torrens), impacts on downstream coastal water quality, and landscape-scale biodiversity outcomes. There is little direction in the current policies</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>in relation to trees, landscaping and/or pervious/impervious areas in relation to development, other than reference to public spaces.</p> <p>There may also be potential to include an additional policy, to fast-track achievement of the stated target “A green liveable city – urban green cover is increased by 20% in Metropolitan Adelaide by 2045”.</p>
<p>Policy 2.3: Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity.</p>	<p>Supported, and suggest “Crime Prevention through Environmental Design” could be referred to here instead of 2.2, or by re-writing 2.2 and 2.3 such that they are both coherent policies.</p> <p>Edit to include “and encourage social connection” because the design of public places can have a positive influence on social connectivity and this should be actively facilitated in the planning system. An example is location of public seating in groups to facilitate casual interaction and conversation:</p> <p>Policy 2.3: Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity, and encourage social connection.</p>
<p>Policy 2.4: 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>	<p>Supported, noting that this policy is critical, and with the following suggestions:</p> <p>Enable early and meaningful local government input/referrals on state assessed developments.</p> <p>Provide for the effective referencing of key reference documents for best-practice e.g. the City of Adelaide’s Urban Design Manual.</p>
<p>Policy 2.5: Promote a culture of good design to foster creative thinking, innovation and effective design processes within the planning industry, allied fields and general public.</p>	<p>Supported, with the suggestion that this could be amended to promote a culture of “excellent” design – not just good, and that this policy should be strengthened by replacing the word “promote” with “ensure”</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	City of Adelaide internal design review processes could also be encouraged.
<p>Policy 2.6: Provide high quality, functional and accessible public green spaces and streetscapes particularly in areas with increasing infill development, housing diversity, population growth, medium to high residential densities and urban renewal.</p>	<p>Supported, with the following comments:</p> <ul style="list-style-type: none"> • It is important that open spaces are both accessible in terms of <i>distance/proximity</i> and designed to be accessible <i>within</i> the open space (e.g. level paths, universal design). • This policy refers to development in public realm, so how does this feed in to the Planning and Design Code unless this more about greenfield large sub divisions • Consider inclusion of green spaces within private development sites too – i.e. not limiting this policy to public areas.
<p>Policy 2.7: Prioritise performance based design quality outcomes in Adelaide City; heritage and character areas; places where medium-rise buildings interface with lower-rise development; mixed-use renewal precincts; transit corridors; and iconic locations that attract high levels of pedestrian activity and/or tourism.</p>	<p>Supported, with the comment that areas that attract high levels of pedestrian activity need to allow for the movement / mobility needs of the full range of people across the life course.</p>
<p>Policy 2.8: Enable quality design solutions in the planning and design code for low-medium density development.</p>	<p>Supported, although this need not be limited to low-medium density development? 2.7 and 2.8 could be combined and apply to all development. This policy could also include specific reference to heritage because many heritage items are low-medium density.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
State Planning Policy 3 – Adaptive Reuse	
	<p>It is acknowledged that this policy is a requirement of the legislation, that adaptive reuse and redevelopment has already occurred in many places in the City of Adelaide, and that this is a State Government focus on enabling more utilisation of existing, unused buildings, in the absence of the market taking the initiative to do so without assistance.</p> <p>Additional research by State Government to more clearly define the problem and clearly define the interventions that are being sought from planning system.</p> <p>Are non-planning system interventions that are proposed by this policy appropriately located in this document?</p>
<p>Objective: The adaptive reuse of existing buildings accommodates new and diverse uses.</p>	<p>Could be simplified to “The adaptive reuse of existing buildings”, and consistent terminology could be used throughout (e.g. adaptive reuse instead of repurposing).</p>
<p>Policy 3.1 Remove barriers and encourage innovative and adaptive reuse of underutilised buildings and places to inspire urban regeneration, stimulate our economy and unlock latent investment opportunities.</p>	<p>Generally supported, with specific suggestions for improvement and clarification.</p> <p>General comment on Policy 3-1 to 3.7 – duplication/repetition of policy – could be simplified (e.g. 3.1, 3.6. 3.7 are very similar)</p> <p>May need to be a recognition that market cycles exist with respect to building utilisation and that underutilisation can also be of benefit to help preserve significant buildings.</p> <p>Suggest replacing “remove barriers” with “encouraging”.</p> <p>There is opportunity for creative industries, under- resourced communities (CALD, Aboriginal and Torres Strait Islander, gender diverse, young people etc) and temporary uses (pop up, Renew Adelaide etc). This requires consideration of proactive planning for entertainment areas and to enable performance and live</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	music to add cultural vitality through underutilised buildings. This requires consideration of innovative relationships of tenure
Policy 3.2 Sponsor models of adaptive reuse that allow flexible access to public spaces and infrastructure.	Additional clarity is sought in relation to what “sponsorship” entails and by whom. “Flexible Access” what does this really mean?
Policy 3.3 Enable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our state’s history.	Include “areas”, include “heritage”. If historical buildings means “heritage buildings” then this needs to be made clear. Is this policy intended to be implemented in conjunction with State Planning Policy 7 – Cultural Heritage?
Policy 3.4 Prioritise the adaptive reuse of buildings within the City of Adelaide and other mixed-use precincts.	Supported as this is consistent with City of Adelaide’s current position. Providing fit for purpose facilities can be achieved within an accessible, equitable and environmentally sustainable framework.
Policy 3.5 Facilitate the conversion and adaption of existing commercial office buildings in the City of Adelaide for residential or mixed-use.	This policy is potentially unnecessary as it would be embedded within 3.4. This could be improved by not simply referring to commercial buildings, but maybe also low-grade stock/aged buildings etc. See comments above regarding policy 3.1 and need for policy direction which encourages adaption for creative and entertainment uses which make Adelaide city culturally vibrant and economically successful. These uses generate potential for interface issues and therefore need to be supported in state policy directions. The City of Adelaide’s Strategic Plan encourages city living and aims to grow the population from 23,000 in 2016 to 28,000 by 2020.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>Policy 3.6 Provide a range of planning and development incentives and bonus schemes to streamline decision-making processes, provide dispensation on prescriptive requirements that constrain opportunities, and capitalise on related regulatory or financial incentives outside of the planning system.</p>	<p>The thrust of this policy is supported, however City of Adelaide would be wary of unnecessarily dispensing with any prescriptive requirements which, as is generally the case, are in place to address key risk and safety requirements, thereby protecting both investors and the City's community and businesses from undue exposure to risk.</p> <p>The phrase "Regulatory and financial incentives outside of the planning system" could benefit from further clarification but might not be essential.</p>
<p>Policy 3.7 Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health and safety.</p>	<p>Is this a duplication of other legislation?</p> <p>Adapting buildings to new uses cannot be done in a way which compromises health, safety and accessibility.</p> <p>Include the words "and equitable access":</p> <p>Policy 3.7 Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses without compromising health and safety and equitable access.</p>
<p>State Planning Policy 4 – Biodiversity</p>	
<p>Objective: Biodiversity is valued and conserved, and its integrity within natural ecosystems protected.</p>	<p>Supported. Aligns with City of Adelaide's strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023 and Adelaide Park Lands Management Strategy.</p> <p>Aboriginal knowledge is embedded into biodiversity management across activities. First Nations peoples are invited to partner in all aspects of biodiversity management including activities with economic benefit.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
Policy 4.1 Protect and minimise impacts of development on areas with recognised natural values, including areas of native vegetation and critical habitat.	Aligns with City of Adelaide's Integrated Biodiversity Management Plan (IBMP) and Adelaide Parklands Management Strategy.
Policy 4.2 Minimise the loss of biodiversity, where possible, in accordance with the mitigation hierarchy: a) Avoidance – avoid impacts on biodiversity b) Minimisation – reduce the duration, intensity and/or extent of impacts c) Rehabilitation/restoration – improve degraded or removed ecosystems following exposure to impacts.	Aligns with City of Adelaide's Integrated Biodiversity Management Plan (IBMP) and City of Adelaide's Strategic Plan "Green Theme". Consider removing the term "where possible". It would also be useful to clarify the connection with the SPP targets and the proposed mechanism for the spatial application and tracking of the effectiveness of this policy.
Policy 4.3 Recognise that modified landscapes have environmental value and that development should be compatible with these values.	Aligned with Strategic Plan Green Theme and Adelaide Design Manual (Green City Chapters TBA) and Adelaide Parklands Management Strategy.
Policy 4.4 Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for conserving the natural values of that landscape.	Supported. This policy is aligned with the Integrated Biodiversity management Plan, Strategic Plan, and Adelaide Parklands Management Strategy. Increases opportunities for people's interactions with 'natural areas' in metropolitan Adelaide. Identify opportunities for Aboriginal culture led tourism created and delivered by First Nations peoples to promote and preserve knowledge and practices and for tangible community benefit.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
State Planning Policy 5 – Climate Change	
<p>Objective: Our greenhouse gas emissions are reduced and development that is climate-ready is promoted so that our economy, communities and environment will be more resilient to climate change impacts.</p>	<p>Supported. This policy is aligned with:</p> <ul style="list-style-type: none"> • City of Adelaide Climate Change Strategy • Draft Carbon Neutral Council Road Map. • Carbon Neutral Adelaide Action Plan. • Strategic Plan Green Theme. • Resilient East Climate Adaptation Plan. • Integrated Biodiversity Management Plan 2018-2023 <p>Additional comments: Some mechanisms and tools will need to be mandated and include quantitative performance measures if they are to be effective via the planning system. This may need to be contemplated from initial design, through to planning approvals through to National Construction Code and compliance. There is real opportunity for these provisions to drive new investment and skills development in the local industry, generating transferable knowledge and demonstrating industry leadership, whilst stimulating local business.</p> <p>Careful consideration of how this is applied in the Planning and Design Code will be required, and industry leadership will be needed.</p>
<p>Policy 5.1 Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.</p>	<p>Supported. Also refer to comments relating to this Policy's Objective, and also in relation to Energy, Key Resources, and Strategic Transport Infrastructure.</p>
<p>Policy 5.2 Ensure the design of public places increases climate change resilience and future liveability.</p>	<p>Supported. Also refer to comments relating to this Policy's Objective, and also in relation to Energy, Key Resources, and Strategic Transport Infrastructure.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>Policy 5.3 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.</p>	<p>Supported and is aligned with City of Adelaide strategies and plans, with consideration that more stringent requirements are required to implement this policy, potentially via the BCA and/or the Planning and Design Code.</p> <p>There is a critical point missing here, that ‘climate smart buildings’ need energy and water efficient design and construction <i>of the building itself</i>, as well as good design of <i>the surrounding areas</i> (WSUD, green infrastructure etc). This is particularly important to low income households where high utility bills due to poor design and construction can have a big impact. Add in this policy content such as “<i>through solar access, orientation, insulation, shading and</i>” which address the building design and construction (or similar wording).</p> <p>Also, increasing medium density and high-rise housing (SPP 6) under conditions of climate change requires careful design and good systems to ensure backup energy supply, building design, cooling/shading and emergency access to reduce risk of vulnerability in emergencies. This is particularly so where the high-rise housing is for vulnerable populations such as older people, people with disability, low income etc</p> <p>Policy 5.3 Ensure the development of climate-smart buildings that reduce our demand for water and energy and mitigate the impacts of rising temperatures <i>through solar access, orientation, insulation, shading and</i> by encouraging water sensitive urban design, green infrastructure, urban greening and tree canopy enhancement.</p>
<p>Policy 5.4 Avoid development in hazard-prone areas or, where unavoidable, ensure risks to people and property are mitigated to an acceptable or tolerable level through cost-effective measures.</p>	<p>Supported.</p>
<p>Policy 5.5 Facilitate green technologies and industries that reduce reliance on carbon-based energy supplies.</p>	<p>Supported.</p>

Consultation Draft State Planning Policy, July 2018		City of Adelaide Comment
Policy 5.6 Protect areas that provide biodiversity and maximise opportunities for carbon sequestration.		“and which maximise?”
Policy 5.7 Ensure decision-making considers the impacts of climate change using the best available information on climate risk which is regularly reviewed and updated.		
Policy 5.8 Support development that does not contribute to increasing our vulnerability or exacerbating the impacts of climate change and which makes the fullest possible contribution to mitigation.		Need to ensure that occurs in practice. Could be improved by “Ensure development does not...”
OUR PEOPLE AND NEIGHBOURHOODS		
State Planning Policy 6 – Housing Supply and Diversity		
Objective: A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.		Supported, noting that there are often unintended consequences of apparent “easy fix” approaches. The suburban model of subdivision is inappropriate within a City setting.
Policy 6.1 – 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.		Supported, with the inclusion of the following comments: <ul style="list-style-type: none"> • The Planning and Design code should to think about other models, in addition to the Residential Code, to deal with density, to achieve better outcomes. Options shouldn’t always be to cut up site. Other options that could be contemplated would allow more innovative solutions, such as a small dwelling at back of a site is acceptable. • The Planning and Design Code also needs to look at character and be more flexible. • More communal open space, would address lack of open space on site to create a better neighbourhood.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<ul style="list-style-type: none"> • Past shows, 'easy fix' solutions have been applied but they change the character of neighbourhood and has resulted in really poor outcomes. • The frontage of a site and how this is managed is critical. • There is no recognition of the context/character. • Design outcomes have been really poor to address density in past
<p>Policy 6.2 – Ensure there is a timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.</p>	<p>It is good to have policy settings that address land supply for housing close to the range of services, facilities, public transport and infrastructure needed by communities. There also needs to be a requirement to address whether the services, facilities and infrastructure have capacity, or will be provided in a timely way to respond to growth and development. This speaks to the Integrated Planning SPP as well as the Principles of Good Planning embedded in the PDI Act. Need for ensure policy settings address the cumulative impacts of development to be considered in the planning for services, facilities and infrastructure that existing and new communities need.</p>
<p>Policy 6.3 – Support regional centres and town growth and the demand for increases in housing supply within the existing town footprint or outside towns where there is demonstrated demand and it is contiguous with the existing development area.</p>	<p>Generally support, although it could be reworded for greater clarity. Coordination with SPP 8 which relates to primary industry would be required, to enable retention and effective operation of key agricultural and horticultural lands.</p>
<p>Policy 6.4 – Promote residential and mixed-use development in centres and corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.</p>	<p>Supported.</p>
<p>Policy 6.5 – Provide a permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation.</p>	<p>Can this include innovative housing solutions such as dual occupancy, ancillary dwellings and tiny houses in addition to small lot housing and aged care accommodation?</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>Policy 6.6 – Increase the amount and diversity of residential 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.</p>	<p>Supported, with the inclusion of “crisis, transitional and social housing near a range of central social services”.</p> <p>The City of Adelaide’s Strategic Plan encourages city living and aims to grow the population from 23,000 in 2016 to 28,000 by 2020.</p>
<p>Policy 6.7 – Enable and encourage the provision of Affordable Housing through incentives such as planning policy bonuses or concessions (e.g. where major re-zonings are undertaken that increase development opportunities).</p>	<p>Supported, however it is recommended that a review of existing policy levers (such as the 15% affordable housing target) is undertaken to understand their effectiveness. A commitment is needed to ensuring any such levers result in the provision of housing for those in need and significantly reduce homelessness.</p> <p>Is there a contradiction between 6.5 and 6.7? Can a planning policy or bonus be applied in a policy environment that is already ‘permissive and enabling’? What is the additional bonus or incentive that would encourage additional affordable housing outcomes?</p>
<p>Policy 6.8 – Support the creation of healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.</p>	<p>Replace the word “<i>support</i>” with “<i>ensure</i>”. This needs to be a stronger policy direction to facilitate liveability and integrated planning outcomes that the SPP aspire to.</p> <p>Does this policy also include schools, child care, health services? They are not listed in the policy, are not in the definition of community infrastructure on p 66, but do appear in the diagram on p 35.</p> <p>There is an inconsistency in the language and definitions regarding social infrastructure, community infrastructure, community facilities and services in the SPP document that needs to be addressed.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
State Planning Policy 7 – Cultural Heritage	
<p>Objective: Places of cultural heritage significance and heritage areas are conserved for the benefit of our present and future generations.</p>	<p>There is considerable opportunity to revise and strengthen the Cultural Heritage State Planning Policy.</p> <p>Comments below relate to the overall potential of this policy, and also some specific comments in relation to both aboriginal heritage and culture, and non-aboriginal heritage and culture.</p> <p>The language of this objective reflects a static historical lens and not the living cultural lens of contemporary cultural heritage understandings.</p> <p>A living heritage approach would unlock opportunities to work with First Nations peoples to not only conserve but to plan to share, celebrate and enhance places of living cultural heritage.</p> <p>A strategic direction in SPP 7 about fostering cultural vitality in the state would be appropriate.</p> <p>There is policy content missing here about promoting cultural vitality and expression. SPP 7 address <i>conservation</i> of cultural heritage, but viable creative and cultural industries need policy settings that promote the importance of these to city vibrancy and cultural expression. An example of this is the venues that provide live music in areas designated for mixed-use development. These venues can be vulnerable to noise complaints from sensitive land uses that encroach on them over time. Acoustic design in mixed use precincts is critical.</p> <p>There are example of other places in Australia that are doing good planning work for entertainment precincts that SA can learn from eg Brisbane and Canberra:</p> <p>https://www.brisbane.qld.gov.au/planning-building/planning-guidelines-tools/other-plans-projects/valley-special-entertainment-precinct/about-valley-special-entertainment-precinct</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>https://www.yoursay.act.gov.au/urban-sounds</p> <p>The built environment and land use planning make important contributions to cultural vitality. In addition to live music/ entertainment venues there is public art, festivals, cultural facilities, public realm design, outdoor dining, liquor licencing, parking provision etc. Also, the affordable creative spaces where creative industries flourish need policy settings to ensure they are promoted and protected in the context of development pressures.</p> <p>This comment could also relate to SPP 9 Employment lands.</p> <p>Built Heritage</p> <p>It is noted that a Heritage Inquiry is currently being conducted by the Environment, Resources and Development Committee. Outcomes from the inquiry will further inform the State Planning Policies.</p> <p>There is potential to include a State Planning Policy which has a specific focus on built heritage. The proposed terminology around 'places' might address built heritage, but it is currently unclear. This policy must also provide for retention, conservation, and adaptation.</p> <p>Future regional plans and the Planning and Design Code will also need to resolve how to development responds to context and adjacent heritage. It is considered the current SPP insufficiently addresses heritage design.</p> <p>The role of heritage tourism for employment, business development is important to reinforce. The policy needs to recognise that retention of heritage is what make a place unique, gives it a story and an identity and makes us different from everywhere else.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	The Cultural Heritage SPP currently doesn't recognise protection of cultural landscapes e.g. not as individual heritage places but rather as significant landscapes i.e. the Barossa.
Policy 7.1 Support and promote the sensitive and respectful use of our culturally and historically significant places.	Refer to comments on the SPP 7 Objective.
Policy 7.2 Recognise and protect Indigenous cultural heritage sites and areas of significance.	<p>Refer and integrate language and intent with current Cultural Heritage legislative requirements.</p> <p>Work with local First Nations Peoples to undertake cultural mapping to understand cultural heritage sites and areas of significance.</p> <p>Also refer to additional comments in relation to the SPP 7 objective.</p>
OUR PRODUCTIVE ECONOMY	
State Planning Policy 8 – Primary Industry	
Objective: A diverse and dynamic primary industry sector making the best use of natural and human assets.	Supported.
Policy 8.1 – Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.	Supported, noting that focusing future residential and urban development in City of Adelaide can contribute to reducing pressure on primary production lands.
Policy 8.2 – Create local conditions that support new and continuing investment in primary industry while seeking to	Supported.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
promote co-existence with adjoining primary industries and avoid land use conflicts.	
Policy 8.3 – Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction, and restructuring.	Supported, noting that City of Adelaide has a role in maintaining and increasing attractiveness of the City and South Australia as a place of national and international choice to do businesses and research enhances the ability to retain existing and attract new talent to primary industry sector across the state.
Policy 8.4 – Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.	Supported, noting that the focus of future residential and urban development and associated land uses in the City of Adelaide can reduce pressure on primary production lands at the edge of urban areas.
State Planning Policy 9 – Employment Lands	
Objective: Employment lands are protected from encroachment by incompatible development and are supported by appropriate transport systems and infrastructure.	Supported – this can relate to City-based employment, office, retail, tourism, arts and culture, entertainment, etc. Residents of the City will also benefit from transport systems which connect them to employment lands in suburbs and regions across the state.
Policy 9.1 – Enable opportunities for employment that are connected to, and integrated with, housing infrastructure, transport and essential services.	Support, with the inclusion of a strengthening of the need for social infrastructure generally.
Policy 9.2 – Support state-significant operations and industries and protect them from encroachment by incompatible and/or more sensitive land uses.	Generally support, on the assumption that regional plans and the creation of the Planning and Design Code will enable regional and local input to the designation and/or reinforcement of existing state-significant operations and industries.
Policy 9.3 – Support and promote adaptable policies that allow employment markets to evolve in response to changing business and community needs.	Supported, noting that this is consistent with the City of Adelaide's Strategic Plan which seeks to grow the economy via the emerging entrepreneurial culture, creating

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	a national centre for applied research and education, increasing the retail and hospitality sectors, and supporting the development of the clean technology sector.
Policy 9.4 – Promote new, latent and alternative employment by enabling a diverse range of flexible land use opportunities.	Supported, noting that this policy may apply to the creative industries that are otherwise missing from the SPP. Land use flexibility will also need to consider interface issues and ensure good policy settings that enable creative and emerging industries to find appropriate space and to grow.
Policy 9.5 – Protect prime industrial land for employment use where it provides connectivity to freight networks; enables a critical mass or cluster of activity; has the potential for expansion; is connected to skilled labour; is well service; and is not constrained by abutting land uses.	Generally supported. This policy reinforces the need to maintain connectivity to City of Adelaide for skilled labour and bypass City for freight.
Policy 9.6 Allow for competition within the retail sector by providing an appropriate supply of land for all retail formats in areas that are accessible to communities.	This policy requires careful consideration prior to finalising. Maintaining and reinforcing retail in the City of Adelaide is a vital element of this State Planning Policy. Careful consideration of regional plans and Planning and Design Code is required to maintain the primacy of the City of Adelaide as a highly accessible retail hub with a growing residential and a large existing visitor and shopping community.
Policy 9.7 – Support sustainable tourism where the social, cultural and natural values underpinning the tourism developments are protected to maximise economic growth.	Consider rewording: “by protecting the social, cultural etc....to maximise economic growth”? Embed opportunities for local Aboriginal peoples to develop tourism offerings that enable custodianship and ensure meaningful community outcomes. This policy is consistent with the City of Adelaide Strategic Plan which seeks to boost visitor numbers and help the economy.
Policy 9.8 – Strengthen the primacy of the city centre as the cultural, entertainment, tourism and economic focus of Greater Adelaide. Enhance its role as the centre for peak legal, financial	Supported, with the inclusion of “retail” in the first sentence.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
and banking services, speciality health and medical services, higher education, the arts and high-quality speciality retailers that contribute to Adelaide City's attributes as a destination.	<p>Suggest also include reference to 'state/national level sport and recreation facilities'. Sport and recreation infrastructure in the City should be 'destination' facilities that attract intra and interstate visitation and are well serviced by public transport.</p> <p>Suggest inclusion of reference to educational, cultural tourism and Aboriginal cultural hub for 39 South Australian language groups.</p>
Policy 9.9 – Encourage the development of vibrant employment and residential mixed-use precincts where conflicts between uses can be managed.	Supported. This policy reinforces the City of Adelaide Strategic Plan in relation to business growth, including by encouraging workers in professional and technical services, education, finance, telecommunications, creative and media sectors.
Policy 9.10 – Plan for employment and industrial precincts that improve economic productivity, are protected from encroachment, connect to efficient supply chains, and minimise transport impacts on existing communities.	Supported, and could be improved by mentioning circular economy and sustainability outcomes.
State Planning Policy 10 – Key Resources	
Objective: Key resources continue to contribute to our state's economy and provide valued employment opportunities.	Supported, noting that this policy could be improved by considering how balance and consultation with the needs and opportunities of Aboriginal custodians can be achieved, and also by including reference to post-resource development clean-up.
Policy 10.1 Define and protect mineral resources operations, associated infrastructure and undeveloped mineral resources from encroachment by incompatible land uses.	Supported, noting that this policy could be improved by considering the need to also define and protect existing land uses from development of mineral resources operations and associated infrastructure.
Policy 10.2 Plan for and implement development in the vicinity of undeveloped energy resources, energy resources operations and associated infrastructure to ensure their ongoing safe and efficient operation.	To manage governmental risk relating to climate change, it would be worthwhile, and in the long term economic, to actively not develop and/or progressively moth-ball and phase out carbon-based energy supplies.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
Policy 10.3 – Identify and maintain strategic transport corridors and other key infrastructure required to support resource sector activities and their supply chains.	No comment.
OUR INFRASTRUCTURE AND MOVEMENT SYSTEMS	
State Planning Policy 11 – Strategic Transport Infrastructure	
Objective: Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and businesses.	Supported. Aligns with City of Adelaide’s strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.
Policy 11.1 – Enable an efficient, reliable and safe transport network connecting business to markets and people to places (i.e. where they live, work, visit and recreate)	Supported. This policy enables multiple modes of transport, including walking, cycling, mobility devices, wheelchairs, buses, taxis, cars, trams, light rail, trains, commercial vehicles, trucks, drones, helicopters, autonomous vehicles (land based and air-borne), aircraft, boats, ships, ferries.
Policy 11.2 – Promote development that maximises the use of existing and planned investment in transport infrastructure and services.	Supported, noting that there are significant community, health, economic and environmental benefits of providing and encouraging the use of active transport modes such as bus, tram, cycling and walking, over and above private, road-based vehicles. Actively planning investment in transport infrastructure that encourages this is important. This can also extend the effective life of existing road infrastructure, create greater on-road capacity for people who must rely on roads, and be more economic by contributing to preventative rather than reactive health-care and supporting a healthier community. Policy 11.6 encourages such modes, however it is important to embed this approach during early planning in transport infrastructure to maximise cost-efficiencies for development.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
Policy 11.3 – Enable equitable contribution towards the provision of transport infrastructure and services to support land and property development.	The wording of this policy is ambiguous and should be clarified. Is it promoting <i>‘equity of access to transport infrastructure and services for communities’</i> , or does it require <i>‘equitable contributions to transport infrastructure and services by developers’</i> ?
Policy 11.4 – Support the long-term sustainability and management of transport assets and the various modes that use these assets.	Refer to comment in 11.2 above.
Policy 11.5 – Minimise negative transport-related impacts on communities and the environment.	Supported. Note that additional regard may be needed during the development of regional plans and Planning and Design Code to the need to consider how to effectively manage visual, sound and safety impacts of emerging air-borne transport options.
Policy 11.6 – 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.	Refer to comments in 11.2 above. Could strengthen this policy by considering “Enable and encourage beneficial health outcomes for people by enabling and encouraging the increased use of a wider variety of transport modes including active transport options such as walking, cycling, public transport, mobility devices etc.”
Policy 11.7 – Allow for the future expansion and intensification of strategic transport infrastructure and service provision (corridors and nodes) for passenger and freight movements.	Supported, although could be strengthened by reference to encouraging design and implementation of strategic transport infrastructure and service provision which encourages and/or contributes to reduced greenhouse emissions. Such an approach may present a competitive advantage to South Australian businesses seeking to minimise corporate risk and for future positioning in a future climate-savvy global market, consistent with South Australia’s clean and green image.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
Policy 11.8 – Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).	Refer to comments in 11.2 and 11.7.
Policy 11.9 – Enable development that is integrated with and capitalises on existing and future transport functions of transport corridors and nodes.	Refer to comments in 11.2 and 11.7
Policy 11.10 – Plan development to take advantage of emerging technologies, including electric and alternative fuel vehicles, autonomous vehicles and on-demand transport opportunities.	Need to respond to these emerging technologies, but also ensure that any unintentional negative externalities are managed in advance to ensure quality of life and amenity is maintained, particularly in relation to air-borne emerging technologies.
State Planning Policy 12 – Energy	
Objective: The ongoing provision of sustainable, reliable and affordable energy options that meet the needs of community and business.	Aligns with City of Adelaide strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023. This policy may benefit from also explicitly seeking to achieve greenhouse gas/emission reductions to help mitigate climate change, and to minimise short and long term risks. Other SPPs are seeking to manage the hazards associated with climate change, and it could be at cross-purposes to not reinforce this within SPP 12 - Energy. Reinforcing the need to reduce greenhouse emissions within the energy policy will also assist with overall risk management associated with governmental responses to climate change.
Policy 12.1 – Support the development of energy assets and their infrastructure which are able to manage their impact on surrounding land uses, and the natural and built environment.	Refer to comment above in relation to also managing short and long-term community, environment and economic risks.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
Policy 12.2 – Support and promote alternative sources of energy supply at the neighbourhood level.	This policy does not make it clear what alternative means – many previously “alternative” energy sources are now mainstream. If this refers to renewable energy sources, then this is supported.
Policy 12.3 – Facilitate access to strategic energy infrastructure corridors to support the interconnection between South Australia and the National Electricity Market.	No additional comment.
Policy 12.4 – Ensure development in the vicinity of major energy infrastructure locations and corridors (including easements) is planned and implemented in such a way as to maintain the safe and efficient delivery and functioning of the infrastructure.	No comment.
Policy 12.5 – Ensure renewable energy technologies support a stable energy market and continued supply and do not adversely affect the amenity of regional communities.	<p>Supported. The City of Adelaide has a state-wide role as a Capital City and supports ongoing success of all regional communities.</p> <p>This may be out of City of Adelaide’s remit for comment, but might there be a potential gap in this policy in relation to supporting renewable energy technologies in remote communities where this has not already occurred?</p>
OUR RESILIENT COMMUNITIES AND ENVIRONMENT	
State Planning Policy 13 – Coastal Environment	
Objective: Protect and enhance the coastal environment and ensure that development is not affected by coastal hazards.	<p>Supported.</p> <p>The City of Adelaide encourages, supports and benefits from tourism in South Australia, and a quality coastal environment is a significant tourism attractor.</p> <p>A potential gap exists in the overall policy, which is the mitigation of the cumulative impact of urban development on coastal environments, via unmanaged water quality</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
	<p>and quantity impacts from upstream development. Development impacts could be reduced by applying low-cost controls across each catchment at the site, precinct, sub-catchment or catchment scale, utilising existing and emerging tools and technologies.</p> <p>Waste management policy in South Australia can also assist by reducing pollutant loads on the coastal environment. The City of Adelaide has been working towards improved waste management throughout the City. Quality design of new buildings to reduce waste generation and reduce waste to landfill is important in the City of Adelaide.</p> <p>Adaptive reuse of buildings (SPP 3) contributes by minimising waste from demolition, and minimising construction waste. There is also an opportunity for industry leadership to protect our coastal environments via simple on-site construction controls during development which can effectively reduce stormwater pollution.</p>
<p>Policy 13.1 Ensure development is not at risk from current and future coastal hazards (including coastal flooding, erosion, inundation, dune drift and acid sulphate soils) consistent with the hierarchy of avoid, accommodate and adapt.</p>	<p>Need to be mindful of this from the perspective of River Torrens via City of Adelaide.</p>
<p>Policy 13.2 Balance social and economic development outcomes in coastal areas with the protection of the environment.</p>	<p>No comment.</p>
<p>Policy 13.3 Protect and enhance the natural coastal environment and its resilience to a changing climate, including environmentally important features, such as mangroves, wetlands, sand dunes, cliff tops, native vegetation and important habitats.</p>	<p>Supported.</p>
<p>Policy 13.4 Locate development in areas that are not subject to coastal hazards unless the development requires a coastal</p>	<p>No comment.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
location and suitable hazard mitigation strategies are in place, taking into account projected sea level risk and coastal retreat.	
Policy 13.5 Facilitate sustainable development that requires a coastal site, including eco-tourism, aquaculture, marinas and ports, in areas adjoining the foreshore, where environmental impacts can be managed or mitigated.	This could incorporate a requirement to be designed to adapt over time to respond to risk and/or new information in relation to level of environmental impact.
Policy 13.6 Maintain or enhance the scenic amenity of important natural coastal landscapes, view and vistas.	Supported.
Policy 13.7 Ensure development maintains and enhances public access to coastal areas with minimal impact on the environment and amenity.	No comment.
Policy 13.8 Locate low intensity recreational uses where environmental impacts on the coast will be minimal.	No comment.
State Planning Policy 14 – Water Security and Quality	
Objective: South Australia's water supply is protected from the adverse impacts of development.	Supported. Aligns with City of Adelaide strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.
Policy 14.1 Provide for the protection and security of the state's water supply to support a healthy environment, vibrant communities and a strong economy.	Supported.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
<p>Policy 14.2 Prioritise the protection of water supply catchments including:</p> <ul style="list-style-type: none"> a) The Mount Lofty Ranges Watershed b) Water Protection Areas under the <i>Environment Protection Act 1993</i> c) The River Murray Protection Area under the <i>River Murray Act 2003</i> d) Prescribed water resources and wells under the <i>Natural Resources Management Act 2004</i>. 	<p>Supported</p>
<p>Policy 14.3 Provide for infrastructure and land use policy that aims to decrease flood risk and improve water quality and urban amenity.</p>	<p>Supported.</p> <p>The development of the Regional Plans and Planning and Design Code development has opportunity to further reinforce water quality and quantity targets that can be achieved on a development site utilising Water Sensitive Urban Design tools and techniques. This would complement work already being done in the public realm and assist with minimising flood risk in the City of Adelaide.</p>
<p>Policy 14.4 Ensure our water supply, stormwater and wastewater infrastructure meets the needs of a growing population and economy while balancing environmental outcomes.</p>	<p>Supported, noting that the City of Adelaide Strategic Plan seeks to work with partners to reduce mains water use through water sensitive urban design and increasing the use of recycled and reused water.</p>
<p>State Planning Policy 15 – Natural Hazards</p>	
<p>Objective: Communities and developments are protected from the adverse impacts of natural hazards.</p>	<p>Aligns with existing City of Adelaide strategic objectives and policy positions and projects/programs including those within the Carbon Neutral Adelaide Action Plan 2016-2021, Carbon Neutral Strategy 2015 – 2025, Resilient East Adaptation Plan and Integrated Biodiversity Management Plan 2018-2023.</p>

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
Policy 15.1 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.	No additional comment.
Policy 15.2 – Design and plan for development in accordance with a risk hierarchy of avoidance, adaptation and protection.	No additional comment.
Policy 15.3 – Locate critical infrastructure such as hospitals, telecommunications, transport systems, and energy and water services in areas that are not exposed to risk from natural hazards.	This must be taken into account in regional planning and Planning and Design Code. Adaptation over time may be required (or do some very rigorous long-term planning/learn from existing studies to inform regional planning, taking into account likelihood of climate change exacerbation of natural hazards).
Policy 15.4 – Mitigate the impact of extreme heat events by designing public spaces and developments to create cooler micro-climates through the use of green infrastructure.	Stronger emphasis on the need to mitigate impact of extreme heat events should also be reflected in SPP2 – Design Quality, so that this is clearly understood and designed for.
Policy 15.5 – Protect key coastal areas and critical infrastructure at risk from sea level rise, coastal erosion and storm surges.	Appropriate management of stormwater in the City of Adelaide can contribute better management of this natural hazard.

Consultation Draft State Planning Policy, July 2018	City of Adelaide Comment
State Planning Policy 16 – Emissions and Hazardous Activities	
<p>Objective: Communities and the environment are protected from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.</p>	<p>This objective assumes that only industrial and infrastructure development can be the cause of emissions and hazardous activities. This policy might be more appropriately worded “enable viable industrial development”.</p> <p>There will need to be close collaboration with the land use definitions, referrals mechanism and yet to be written regulations to appropriately manage emissions and hazardous activities associated with development and spatial planning.</p> <p>Does/should this Policy include greenhouse gas emissions as a risk and hazard from development and land use?</p>
<p>Policy 16.1 – Ensure our communities and the environment are protected from risks associated with emission and radiation activities while ensuring that industrial and infrastructure development remains viable through:</p> <ul style="list-style-type: none"> a. Ensuring appropriate zoning and mixed uses are compatible b. Avoiding establishing incompatible land use interfaces through encroachment on industrial sites by maintaining adequate separation distances. c. Incorporating engineering controls into building design where emission or impacts are unavoidable. 	<p>If the referral mechanism, e.g. to EPA and other agencies is inadequate then individual assessment might be inadequate.</p> <p>Close liaison across government and with local government and industry will be important during the writing of the Planning and Design Code, as well as during its implementation.</p>
<p>Policy 16.2 – Ensure risk posed by known or potential contamination of sites is adequately assessed and managed to enable the appropriate development and safe use of land.</p>	

Attachment C



CITY OF
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21 February 2019

Mr Michael Lennon
Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Dear Mr Lennon

Response to Policy Discussion Paper – Productive Economy

The City of Adelaide values and appreciates the ongoing opportunity to provide input and feedback to documents that are informing the creation of the State's new planning system.

We are largely supportive of the approach and intention of the Productive Economy Discussion Paper; however, our more specific suggestions and feedback are included in our Council-endorsed response (attached).

We continue to welcome the opportunity to discuss our feedback with you in more detail, and to actively consider opportunities to contribute to the implementation of the PDI Act.

Kind regards

[DELETED]

Shanti Ditter
Associate Director, Planning and Development

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RESPONSE TO PRODUCTIVE ECONOMY

Comments on the 'Productive Economy Discussion Paper' from the City of Adelaide are summarised below by theme. Detailed comments are included in the attached Table 1.1 – City of Adelaide Response to Productive Economy Discussion Paper.

The City of Adelaide is largely supportive of the approach and intention of the Productive Economy Discussion Paper and comments against the proposed approach to investigating and staging the creation of new policies for inclusion in the Planning & Design Code are included in this document.

City of Adelaide Strategic Plan

At a high level, the City of Adelaide Strategic Plan 2016-2020 should be considered as a key input to the preparation of the Planning & Design Code (P&DC). It contains specific Objectives and Actions which are of direct relevance to the Productive Economy Discussion Paper and the creation of the Planning & Design Code.

Its key themes are Smart, Green, Liveable and Creative, and the City's primary goal is to "strengthen the City Economy by growing the number of people living, working, playing, visiting and studying in the City every day".

"To achieve our vision and remain uniquely Adelaide, our Strategic Plan principles will ensure our City will be:

- Iconic and celebrated for its distinctive heritage and cultural values
- Inclusive of all members of our community and accessible for all
- Diverse enough to accommodate a range of activities and experiences valued by people of different ages, cultures abilities and interests
- Resilient to a changing climate and able to sustain quality experience, both now and for future generations
- Affordable relative to other capital cities and liveable with great infrastructure, arts, recreation and sport
- Made up of distinct districts each with its own character and fully engaged community.

The City of Adelaide is the capital city of South Australia and the Planning and Design Code should recognise and reinforce the primacy of the 'city centre', namely:

- Its cultural and economic focus
- As the state's epicentre for legal and financial services
- As the heart of specialist medical services
- As the heart of research and higher education
- With the state's highest quality retailing
- Identify new challenges and opportunities for the City.

Land use definitions and how they are modernised and integrated within the new system are of critical importance and require critical attention. For example, definitions in relation to rapidly changing economies such as short-stay accommodation, the gig-economy and the like are susceptible to change. With emerging technologies, new and never imagined land uses will emerge.

The City of Adelaide recognises and encourages the pursuit of the unique opportunity for embedding a "form-based approach" to the drafting of the Planning & Design Code, as anticipated by the *Planning, Development and Infrastructure Act, 2016*.

A summary of Council's feedback to the Discussion Paper follows.

THEME 1: Supporting and Growing Key Industries

1.1 Primary Industries

The City of Adelaide Strategic Plan seeks to “advocate for an urban growth boundary that limits urban sprawl and promotes the City as the commercial, cultural, residential and social heart of metropolitan Adelaide”.

1.2 Tourism

The City of Adelaide is a key tourist destination and there is a need to maintain, preserve and enhance the unique attributes of our built and natural environments to support and grow tourism opportunities. The goals of the City of Adelaide “Visitor Economy Action Plan 2018-2020” should be recognised and enabled within future Planning & Design Code (P&DC) policy.

Heritage tourism is also of particular importance to our City’s economy and the careful drafting and application of future P&DC policies should occur with regard to the fact that the City’s cultural heritage is a valuable economic asset, with direct heritage tourism expenditure valued at \$375 million annually.

1.3 Mining and exploration

The P&DC may need to address the timing and intensity of mining exploration and extraction of fossil fuels to better support the State and City of Adelaide’s risk approach to climate adaptation (Carbon Neutral Climate Change Strategy, Draft Carbon Neutral Council Road Map, Resilient East Climate Adaptation Plan and Carbon Neutral Action Plan 2016-2021). Mining impacts on tourism in our food and wine production areas should also be addressed via the P&DC to support the City of Adelaide’s “Visitor Economy Action Plan 2018-2022”.

THEME 2: Linking People to Jobs, Goods and Services

2.1 Centres, retail and mixed-use activities

- a) Successive planning strategies over many decades have recognised and sought to continue the CBD’s primacy at the peak of the centres hierarchy in South Australia. This should be reinforced, in addition to supporting and reinforcing City retail and main streets.
- b) Capital city focussed policy should be developed for spatial application within the City of Adelaide, and regard should be had to strategies such as the City of Adelaide “Experience Adelaide – Adelaide City Retail Strategy 2015-20”, and the “Our Market District – Market District Plan”.

2.2 Employment Lands (industry, manufacturing and commercial)

- a) The planning policies that encompass the site at Lot 14 (Former RAH site) reflect the use of the land when it was in hospital use. The planning policies for this land parcel are out of date and urgently need to be revised and updated to reflect the site as a future innovation hub.

2.3 Home-based businesses

- a) The central part of the City is an existing and desirable area for mixed use in an intense environment. The residential areas have a range of home-based and long-established historic businesses. The planning system needs to continue to enable this mix of uses to coexist and have policy that acts to prevent conflict such as from noise between otherwise generally compatible land uses.

THEME 3: Providing Infrastructure to Enhance our Liveability

3.1 Renewable energy

- a) Reducing greenhouse gas emissions and enabling development which is climate-ready, including decentralised renewable energy, is aligned with existing City of Adelaide policy and the following initiatives could be supported by the Planning and Design Code by:
- Continuing to support the adaptive reuse of under-utilised and heritage listed buildings.
 - Fostering design leadership in energy efficiency, reduced embodied energy and increase renewable energy systems in new developments.
 - Enabling decentralised energy generation within significant development sites.
 - Increasing routine building construction and planning inspections for thermal performance, energy efficiency and sustainability.
 - Facilitating an energy hierarchy in the built form, including:
 - Low carbon design and construction measures
 - Passive design
 - Supplying energy efficiently including decentralised energy generation and embedded networks
 - Large scale renewable energy.

3.2 Adaptive Reuse

- a) It should be noted that adaptive re-use occurs constantly and when market forces allow it to occur.
- b) Commentary on barriers which exist to adaptive re-use need to be based on thorough research to enable targeted recommendations to change the planning and building rules in response. Research is currently being conducted via Heritage SA and City of Adelaide that should be drawn upon to inform future policy.

3.3 Infrastructure

- a) The focus of the discussion paper is the provision of infrastructure for greenfield developments. With increased densities and the amount of infill development, the capacity of existing infrastructure within metropolitan Adelaide and the City will need to be managed and curated to ensure it has the capacity to cater for increased use loads on all physical infrastructure from potential growth.

THEME 4: Facilitating Innovation and Enabling Investment


4.1 Collaboration and clustering

- a) The P&DC should respond to key infrastructure initiatives such as the City of Adelaide's "Ten Gigabit Adelaide" project which is being delivered to 1000 commercial buildings in the City of Adelaide.
- b) Innovation districts and mixed-use areas require recognition that 'mixed use' is the goal of the area and to have enough policy to ensure that outcome. For example, policy requiring that ground level uses should be non-residential and that a proportion of a multi-level buildings be non-residential use. The Capital City and City Frame zones are examples.

4.2 E-commerce and a sharing economy

- a) City of Adelaide is particularly interested in assisting with shaping and influencing the e-commerce and sharing economy sector as this policy is developed in the second generation of the P&DC.

Table 1.1 – City of Adelaide Response to Productive Economy Discussion Paper

DPTI Sub-Theme	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
THEME 1: SUPPORTING AND GROWING KEY INDUSTRIES				
<i>General comment</i>				The City of Adelaide is very supportive of growing key industries however the proposed approach in the Productive Economy discussion paper to the P&DC does not enable a coherent response from the perspective of the City of Adelaide. Tourism is the only policy category of direct relevance to development in the City of Adelaide, however key industries in the City of Adelaide are more varied in scope than tourism and are also of key importance to our state's economy, for example the university sector and the medical research sector.
<i>1.1 Primary Industries</i>	1A Allow ongoing generational farming, investment, value-adding and job growth in the vital food production sector.	Refine and transition the policy intent of SAPPL policies that support: <ul style="list-style-type: none"> Value-adding activities Ancillary dwellings, dependent accommodation, tourist accommodation and short-term worker accommodation in primary production areas Farm buildings and horticultural buildings Rural living (inside and outside the Environment and 	Transition ready 	City of Adelaide understands the importance of supporting and growing primary industries and recognises that many businesses, educational institutions, services etc. located within the City of Adelaide support and benefit from a thriving primary industry sector.

DPTI Sub-Theme	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
		Food Production Areas).		
	1B Planning policy needs to conserve natural environments, biodiversity and agricultural lands to ensure continued productivity.	Include the EFPA and McLaren Vale and Barossa Valley Character Preservation Districts into the Code as an overlay.	Transition ready ✓	The City of Adelaide Strategic Plan seeks to “advocate for an urban growth boundary that limits urban sprawl and promotes the City as the commercial, cultural, residential and social heart of metropolitan Adelaide”.
	1C Review the storage, transport and logistics needs of SA farms (in the context of broader primary production use policy) to enable bulk handling in locations with logistical advantage.	Review and update SAPPL bulk handling policies.	Transition ready ✓	No comment.
	1D Develop better policy criteria/guidelines for new and emerging infrastructure such as, but not limited to, frost fans, solar farms, telecommunications, and horticultural netting for those cases that are not exempt under the new Regulations.	Review primary production planning policies to ensure that development activities or land uses which are complementary and ancillary to on-farm primary production activities are envisaged in the Code.	Reform (Gen 1)	No comment.
	1E	Review definitions in relation to primary production land uses	Reform (Gen 1)	City of Adelaide supports the work being undertaken to review land use definitions and would support modernisation to these

DPTI Sub-Theme	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	It is important to modernise definitions and policies that have not kept up with modern farming practices, requirements or directions.	including additional dwellings, tourist accommodation and farm buildings.		definitions as per the response City of Adelaide has previously provided to State Government.
	1F Review and introduce clearer policy regarding urban interface for buffers, spray drift, separation distances, desired mix of land uses and township boundaries.	Adopt a more standardised urban/rural interface buffer policy across South Australia, with locational variation, where required.	Reform (Gen 2)	Emerging urban agriculture may also require consideration in the P&DC, however the timing of these policy considerations may also be best suited to Reform (Gen 2).
	1G Retain and improve locational/site specific needs, buffers and interface policy and guidance for intensive animal keeping and stock rates.	Refine and update policies relating to commercial and non-commercial animal keeping (including stock rates).	Reform (Gen 2)	Emerging urban agriculture may also require consideration in the P&DC, however the timing of these policy considerations may also be best suited to Reform (Gen 2).
	1H Ensure aquaculture policy addresses the need for required services. This includes ensuring that associated allotments are large enough to cater for on-site processing and other activities, such as storage of baskets.	Review on-land aquaculture policy to ensure consistency with current industry standards, including buffer separation distances.	Reform (Gen 2)	No comment.

DPTI Sub-Theme	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<p>11</p> <p>There is an opportunity to better support primary industry business to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction and restructuring.</p>	<p>Review primary industry policies to identify opportunities to better respond to emerging technologies, practices and other changes.</p>	<p>Reform (Gen 2)</p>	<p>Emerging urban agriculture may also require consideration in the P&DC, however the timing of these policy considerations may also be best suited to Reform (Gen 2).</p>
	<p>Discussion Questions:</p> <p><i>Should the Code include a 40 metre interface buffer between rural and residential, but allow a smaller buffer distance if it can be justified?</i></p> <p><i>Does policy regarding subdivision and minimum allotment sizes need to be reviewed and strengthened?</i></p>			<p>No comment.</p> <p>No comment.</p>


DPTI Sub-Theme	Ref No /DPTI key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
1.2 Tourism	<p>1J</p> <p>Tourism is important for the State's economy and therefore it is important to continue to encourage and support its growth.</p>	<p>Refine and transition the policy intent of SAPPL tourism Development General Module policy.</p>	<p>Transition ready</p> <p>✓</p>	<p><u>Tourism and the Visitor Economy</u></p> <p>The City of Adelaide "Visitor Economy Action Plan 2018-2020" sets out actions to achieve key city targets from the City of Adelaide Strategic Plan, namely:</p> <ul style="list-style-type: none"> - By 2020, our City's economy will be growing faster than the Australian economy - Bed nights spent in the City by international and domestic visitors will have grown from 8.1 million to 9 million by 2020 - People who say the City has great places to enjoy, events, activities, art and culture will have grown from 8.4 to 9 out of 10 by 2020 - Attendance at festivals and events in the City and Park Lands will have grown by 5% by 2020. <p>Visitor Economy Action Plan 2018-2020:</p> <ol style="list-style-type: none"> 1. Promote the Adelaide Experience 2. Develop and enhance Adelaide's offering 3. Industry and stakeholder engagement <p>Enhancing arrival experience into Adelaide is a key action, including Adelaide Central Bus Station, Adelaide Airport, Adelaide Park Lands Terminal, Adelaide Railway Station and Outer Harbor.</p> <p>The transition of the SAPPL tourism policies should consider the particular circumstance of the City of Adelaide and potentially other non-rural tourism locations, as some of the current SAPPL wording does not easily lend itself to a City environment and could be inadvertently inappropriate in a City setting.</p> <p><u>Tourism and Heritage</u></p> <p>Heritage tourism is of particular importance to the City of Adelaide. Our research in 2015 showed that an impressive \$375</p>


DPTI Sub-Theme	Ref No /DPTI key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>million was spent by visitors on cultural heritage related tourism in the City of Adelaide in 2013-14. The following two reports are of particular relevance and should be considered during the drafting of the Planning & Design Code:</p> <p><u>Economic Benefit of Heritage Tourism Study – 2015</u> https://www.cityofadelaide.com.au/assets/documents/Economic_Value_of_Heritage_Tourism_-_Adelaide_2015_v4.pdf</p> <p>The City of Adelaide commissioned Tourism Research Services (WA) to assess the value of Adelaide's heritage tourism.</p> <p>Visitors who stayed at least one night in Adelaide were questioned about features of Adelaide which influenced their decision to visit and stay. This in turn enabled an evaluation, in dollar terms, of the amount of tourists' expenditure attributable to heritage compared with other features.</p> <p>The City's cultural heritage is a valuable economic asset, with direct heritage tourism expenditure valued at \$375 million annually.</p> <p><u>The Economic Value of Built Heritage in the City of Adelaide – 2018</u> https://www.cityofadelaide.com.au/assets/FINAL_REPORT_-_SGS_Economics_Planning_-_The_Economic_Value_of_Built_Heritage_in_the_City_of_Adelaide_(February_2018).pdf</p> <p>The City of Adelaide commissioned SGS Planning & Economics to assess the value of Adelaide's built heritage, including the financial benefits of the City of Adelaide's Heritage Incentives Scheme.</p>


DPTI Sub-Theme	Ref No /DPTI key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>Key findings from the study include:</p> <ul style="list-style-type: none"> - \$1.68 return to the South Australian economy for every \$1 invested via the City of Adelaide's Heritage Incentives Scheme (HIS). - The HIS has contributed \$395m to Gross State Product and supports 3,000 jobs. - Over \$20m invested by the City of Adelaide over the 30 years of operation of HIS.
	<p>1K</p> <p>It is important to strengthen and provide greater certainty to tourism, including where it should be located.</p>	<p>Refine SAPPL zones and the land use definitions to:</p> <ul style="list-style-type: none"> - Clearly define where tourist accommodation is anticipated - Set the appropriate level of assessment - Ensure the definitions provide certainty and consistency for the purpose of assessment - Provide the flexibility required for the tourism industry to respond to changing market sand explore innovative ideas. 	<p>Reform (Gen 1)</p>	<p><u>Tourism Assets</u> – The City of Adelaide and its cultural, heritage, entertainment, sporting, Park Lands, business and other features is a key tourism attraction in and of itself. Care should be taken during policy conversion to the state-wide Planning and Design Code to continue to retain existing tourism assets, whilst also enabling the creation and evolution of new tourism assets within the City of Adelaide.</p> <p><u>Sharing Economy/Air B'n'B</u> - refer to comments in response to Section 4E.</p> <p><u>Cultural Roadmap</u> – The City of Adelaide Cultural Strategy 2017-2023 is a key document which underpins Council's Strategic Plan by seeking to strengthen Adelaide as a multi-cultural city with a passion to create authentic and internationally renowned experienced:</p> <ol style="list-style-type: none"> 1. Adelaide's cultural identify is unique and our creative reputation is renowned 2. Adelaide's cultural economy is robust, sustainable and easy to navigate 3. Adelaide has an engaged, collaborative, knowledgeable and connected cultural community 4. Adelaide is recognised as a cultural incubator where people, enterprises and audiences flourish

DPTI Sub-Theme	Ref No /DPTI key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>5. Adelaide is renowned for its authentic, vibrant and diverse cultural experiences</p> <p>The cultural roadmap identifies the following priorities:</p> <ul style="list-style-type: none"> - Adelaide City of Music Live Music Action Plan 2017-2020 - Public Art Action Plan - Public Art and Memorials Policy - Arts and Cultural Grants Guidelines - Other cultural policies and action plans to be developed. <p>The night-time economy in the City should continue to be enabled to thrive, including zones allowing for sound i.e. outdoor events and live music venues and the Planning and Design code should reinforce progress that has been made in this area, particularly in relation to ensuring that policies are based on the “agent of change” principles which are applied to proposed development, whether it be new apartments or new music venues. Culturally creative and innovative industries should also be enabled in the City of Adelaide.</p> <p><u>Tourism Accommodation</u></p> <p>The City of Adelaide is a primary location for tourism accommodation in the State and the future Planning and Design Code should continue to reinforce this key aspect of our City’s economy. The transition of the SAPPL tourism policies should consider the particular circumstance of the City of Adelaide, as some of the current SAPPL wording does not easily lend itself to a City environment and could be inadvertently inappropriate in a City setting, depending upon which policies are “called up” in a particular spatial application of the Planning & Design Code. The density of the City and contested space in the public realm also lends itself to other policy requirements for example hotel loading zones on the street instead of within the site.</p>

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	<p>Discussion Question:</p> <p><i>Do we need to review our signage policies? In particular, do we need facilities for third party advertising and tourism advertising? For example, should there be more scope for tourism signs on arterial roads and outside of townships?</i></p>			<p>There is potential in the City of Adelaide to continue to advance opportunities for maximising the visitor, shopper and tourist experience via wayfinding and signage which complements the built form and natural environments of our City. Planning and Development Code policies should enable effective physical and technological approaches.</p> <p>Within the City of Adelaide, third party advertising is not encouraged in most locations based on generally negative visual amenity impacts within a dense urban setting and impact on streetscape character. It is suggested that a review of signage policies consider the various forms of advertising and promotion that are available (i.e. social media and on-line platforms) to ensure a balanced and well-informed policy position on appropriate signage in different locations.</p>

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1.3 Mining and exploration	1L There is a need to provide flexibility for industry/light industry in Mineral Extraction Zones, whilst protecting the viability of mining operations.	Refine and transition the policy intent of the SAPPL Mineral Extraction Zone, in particular, policies that have the flexibility the enable complementary activities to be undertaken within mining areas.	Transition ready 	No comment.
	1M Mining and exploration is a long term investment for the state and, given its vulnerability to market forces, operational intensities may vary over time.	Review policy regarding mining activities to: <ul style="list-style-type: none"> - Consider separation distances - Enable ancillary and associated developments - Provide improved consistency, certainty and transparency - Consider appropriate zoning for resource areas. 	Reform (Gen 2)	The P&DC may need to address the timing and intensity of mining exploration and extraction of fossil fuels to better support the State and City of Adelaide's risk approach to climate adaptation (Carbon Neutral Adelaide Action Plan 2016-2021). Mining impacts on tourism in our food and wine production areas should also be addressed via the P&DC to support the City of Adelaide's "Visitor Economy Action Plan 2018-2022"
	Discussion Question: <i>Should undeveloped strategic mineral resources be identified and protected from urban encroachment and other incompatible development?</i>			No comment, however it is noted that consideration could also be given to below-ground land use zoning, which would be possible given the 3D mapping technologies currently available.


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THEME 2: LINKING PEOPLE TO JOBS, GOODS AND SERVICES				
2.1 Centres, retail and mixed-use activities	2A Centres are an important part of SA's economy. There is an opportunity to consolidate the range of centre type zones (including regional centre zones) and transition to the Code.	Transition, update and consolidate the existing contemporary retailing, activity centres and regional centre policies and zones.	Transition ready 	<p>The City of Adelaide is the capital city of South Australia and the Planning and Design Code should recognise and reinforce the primacy of the 'city centre', including:</p> <ul style="list-style-type: none"> - Cultural and economic focus - Epicentre for legal and financial services - Heart of specialist medical services - Heart of research and higher education - Our highest quality retailing - New challenges and opportunities for the City. <p>The existing SAPPL library does not currently contain policies which are of specific reference and applicability to the City of Adelaide. Relevant current Adelaide (City) Development Plan policy relating to centres, retail and mixed-use activities should be transitioned to the new P&DC.</p> <p>Regard should be had to the <u>City of Adelaide "Experience Adelaide – Adelaide City Retail Strategy 2015-20"</u> which seeks for key outcomes:</p> <ul style="list-style-type: none"> - A remarkable experience - A compelling retail offer - A destination of choice - A prosperous retail sector <p>The goals of the current Retail Strategy are currently supported and enabled by the Adelaide (City) Development Plan, however it should be noted that this strategy is likely to be updated over time. The new state-wide Planning & Design Code will need to be drafted with specific regard to the goals and ambitions of the City of Adelaide, enable responsiveness to change in this sector over time, and by leveraging the City of Adelaide's Urban Design Framework to support public realm improvements and make great places that link precincts and districts, attract retail investment, improve customer comfort and encourage the uniqueness of</p>

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				<p>districts. “Our Market District – the Right Ingredients for the Future” should also be considered in this context.</p> <p>Successive planning strategies over multiple decades have recognised and sought to continue the CBD’s primacy at the peak of the centres hierarchy within SA. Successive Councils have monitored proposed significant retail and centres development in terms of its impact on the primacy and has made submissions where appropriate.</p> <p>Separate to centres policy, Council recognises that it has a role to play in supporting City retail and main streets and has a range of ongoing programs to give that effect. These include Enterprise Adelaide, the Mainstreet Development Program and support for start-ups. In terms of centres policy, Council would be open to a review of the centres hierarchy that has regard to retail and population trends and best positions greater Adelaide – with the CBD in an ongoing primacy role – with a range of centres with retail, commercial and business opportunities.</p>
	<p>2B</p> <p>Promote mixed use zoning and flexible policy to support innovation, growth and diversity to provide for changing business and market needs, particularly in the right locations.</p>	Review and transition the policy intent of SAPPL mixed use zones.	<p>Transition ready</p> 	The current Adelaide (City) Development Plan incorporates mixed use zoning across all zones that should be transitioned across to the P&DC. This mixed-use zoning approach will help support innovation growth and diversity to provide for changing business and market needs including, for example, cultural and creative industries.
	<p>2C</p> <p>Conventional ‘bricks and mortar’ retail industry is experiencing significant disruption by out-of-centre retailing, international competitors entering the market, online retailing and</p>	Undertake a review of retail policy and consider how it can be strengthened to respond to current and future challenges and opportunities.	Reform (Gen 1)	City of Adelaide agrees that a review of retail policy as proposed to inform the P&DC will be worthwhile. The City of Adelaide retail policy may also benefit from review and future retail needs to be canvassed and re-imagined, with particular consideration given to potential impacts on SME businesses. The policy review needs to be backed by strong policies that protect existing land uses whilst also encouraging and promoting new retail opportunities.


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	shared economies and this is changing the form, scale, intensity and locations of retail activities.			<p>In a City context, the 'agent of change' principle which is utilised for noise and acoustic treatments should also be applied in a retail setting.</p> <p>The attractiveness of the City of Adelaide as a venue for festivals and tourism etc. is enhanced by the walkability of retail hubs and clusters. Policy settings in the P&DC should not geographically dilute the retail offering within the City. Consideration could also be given to providing sufficient flexibility to enable day time retail and night time bars in the same sites/space.</p>
	<p>2D</p> <p>The Bulky Goods Zone is not consistent with general zone structure and intent as it lacks fundamental policy differentiation to warrant separate zoning/policy identification.</p>	Transition of the policy intent of the SAPPL Bulky Goods Zone into a broader zone option.	Reform (Gen 1)	This should be considered within the context of the overall review of retail policy as identified in 2C.
	<p>2E</p> <p>Town centres could allow for a 'softening of edges' between business and residential activities and mixed-use developments.</p>	Review policy opportunities for expansion of activity centre developments into adjacent zones (where appropriate).	Reform (Gen 2 and beyond)	<p>Policy change as a result of a review needs to be carefully considered to ensure changes are planned and consulted on with the community. Unplanned 'creep' of mixed land uses may result in unintended negative consequences. Conversely, well-planning policy approaches can enable mixed land uses which enhance a local area.</p> <p>Local activation opportunities and development that has no residential/environmental detriment could be considered.</p> <p>See also comments provided against 2C.</p>


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	<p>2F</p> <p>The recently approved Existing Activity Centres Policy Review DPA introduced a number of policy changes to activity centres in the metropolitan area to improve their economic efficiencies and increase competitiveness. These changes should be considered for application in regional areas where appropriate.</p>	Investigate opportunities for expansion of activity centre developments into adjacent zones (where appropriate).	Reform (Gen 2 and beyond)	<p>Agree that more detailed investigations should occur. It is important to consider more smaller-format retail/service/social infrastructure/neighbourhood approach in the City context and the P&CD policy needs to respond to the specific needs of the City, noting that convenience and amenity is “king”.</p> <p>Policy change resulting from the review needs to be carefully considered to ensure changes are planned and consulted on with the community. The interface between main streets and residential zones.</p> <p>Local activation opportunities and development that has no residential/environmental detriment could be considered.</p> <p>See also comments provided in 2C.</p>
	<p>2G</p> <p>Many regional centre type zones are now out of date. Especially if a centre is showing signs of decline consider approach to re-activate or change scope.</p>	Explore policy options regarding the redevelopment or rezoning of regional activity centres which are in decline or vacant.	Reform (Gen 2 and beyond)	City of Adelaide is interested in contributing to this discussion when it occurs, noting overseas trends in the shopping centre industry, and with regard to opportunities for re-activation of centres for cultural purposes. Refer to comments in 2A.
	<p>Discussion Questions:</p> <p><i>Is there a need to retain the centres hierarchy or not – is it still relevant to today’s planning?</i></p> <p><i>Should there be residential development within retail centres? If so, how could/should this occur?</i></p>			<p>The discussion paper recognises but does not sufficiently emphasise the role and protection of the Adelaide City as the civic, cultural and commercial heart of South Australia in the proposed policy response. Without any reference to this there could be the potential for significant suburban CBD’s to weaken and diminish Adelaide CBD’s role.</p> <p>The City of Adelaide has around 24,000 residents, 5,000 businesses, and around 115,000 workers. The Paper’s discussion of agglomeration economies is acknowledged as applying with the City and sought to be continued. In terms of land use and development, the central part of the City is an existing and</p>

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				<p>desired area of mixed use in an intense environment with the residential areas have a range of home based and long-established historic businesses. The planning system needs to continue to enable this mix of uses and to have policy that acts to prevent conflict such as noise between otherwise generally compatible land uses.</p> <p>Council notes that Discussion Paper's acknowledgement that 'Central Adelaide has all the markings of a leading innovation precinct' and that 'Planning rules should continue to evolve to foster the blending of employment, residential and cultural uses to realise this potential' (pg 47).</p> <p>The City has also experienced and approved activities that could be seen as 'manufacturing' which add to the employment base. This experience can be drawn on in considering the new Code.</p> <p>In considering increased diversity of uses within metropolitan located employment lands – be it commercial or industrial areas - the impact on the CBD's office and retail function should be considered. The role such land plays in a Greater Adelaide increasing in population should also be considered.</p> <p>Assumptions are made about the CBD however the paper does not explicitly consider the economic value the CBD brings to the state economy. The Planning & Design Code policy needs to demonstrate that it will ensure that the economic energy of the City is not drained out and its role weakened.</p> <p>Residential development in retail centres should not prejudice the prime retail and business function of the centre. As a general principle, additional floor space in centres should provide for business and commercial uses (as distinct to residential). This would enable opportunities for start-up businesses (this might include businesses which have outgrown a residential context) and provide additional local employment and services.</p> <p>Whilst 'residential zones' are intended to foster residential amenity, it is a misnomer to consider these as exclusively residential. Acknowledging existing residential areas vary, to the extent possible whilst maintaining residential amenity and</p>


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				fostering the role of centres, opportunities for business in residential areas should be enabled. This should include home based business, non-residential use of existing structures (including heritage items) originally built as commercial or retail, as well as flexibility for established generally compatible non-residential uses – such as schools and child care - to be able to invest.
<i>2.2 Employment lands (industry, manufacturing and commercial)</i>	2H There is a need to provide flexible policy that enables a diversity of industry and commercial activities to reflect changing industry trends.	Review, consolidate and transition the policy intent of SAPPL industry and commercial zones to respond to changing technologies and markets.	Transition ready 	City-specific policies in the P&DC need to enable compatible industry, small-scale manufacturing and commercial activities in the City as appropriate with regard to noise, scale and environmental impact. For example, planning policies that encompass the site at Lot 14 (Former RAH site) reflect the use of the land when it was in hospital use. The planning policies for this land parcel are out of date and need to be revised and updated to reflect the site as a future innovation hub.
	2I There is increased pressure on industrial lands and the economic viability of industries through encroachment by sensitive uses. Therefore it is important to review and refine these policies.	Review and update SAPPL industry zones to ensure that industrial activities are protected from encroachment by conflicting land uses.	Reform (Gen 1)	No comment.
	2J There is a need for consideration of residential development that is ancillary to business/industrial activities on land in employment land type zones. For example,	Review and update policy in relation to the provision of short-term/ancillary worker development in industrial zones to support economic	Reform (Gen 2)	No comment.

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	accommodation for truck drivers, on-site managers, business owners and other workers.	activities (such as defence and mining).		
	2K Consider opportunities to promote business clusters on the basis of shared knowledge, infrastructure, skills or labour to unlock economies of scope and scale (where appropriate). For example, science and technology hubs, defence industries, ports and intermodals and waste management.	Identify and improve zoning that supports industry and commercial clusters.	Reform (Gen 2)	Refer to response in Theme 4.
	<p>Discussion Questions:</p> <p><i>Should there be a more flexible approach to encouraging a wide range of land uses in non-residential zones – with a land use genus, impact and design focus, rather than strict land use definitions?</i></p> <p><i>Is there too much emphasis placed on height and setback criteria in employment lands zones, in particular the ‘core’ of these zones?</i></p>			

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2.3 Home-based businesses	2L The Code provides an opportunity to review home industry policy and decide whether it should be in a residential or light industry zone in the future.	Review and transition home industry policies to an appropriate zone.	Transition ready 	It is considered that light industry, special industry, industry definitions all need to be looked at, not simply the home industry policy.
	Discussion Question: <i>What innovations and changes to work practices will impact the planning system and how should we respond?</i>			Innovations and changes to work practices are to be expected over time, and the current planning reforms and review of policy are a key opportunity to ensure policy and assessment practices support the aims and needs of our community. The planning system itself should be a considered and informed reflection of the aims and goals of our community. Temporal considerations (daytime/evening/late night) relating to land uses may need to be explicitly considered, as is currently the case in the Adelaide (City) Development Plan.

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THEME 3: PROVIDING INFRASTRUCTURE TO ENHANCE OUR LIVEABILITY				
3.1 Renewable energy	<p>3A</p> <p>There are a wide range of renewable energy sources including wind, solar, geothermal, hydrogen, hydropower, tidal and biofuels.</p> <p>Policy needs to be updated to keep up with the new forms of development and technological changes. This means providing improved guidance regarding the intensity, location and impacts of these developments.</p>	Investigate and introduce policy to provide improved guidance in relation to renewable energy generation developments.	<p>Transition ready</p> 	<p>Supported by City of Adelaide, as this is consistent with our Smart, Green, Liveable and Creative Strategic Plan goals, as well as our Carbon Neutral Strategy. A bigger climate change focus is needed, and City of Adelaide could collaborate further with the State Government and other key stakeholders to achieve these goals.</p> <p>Reducing greenhouse gas emissions and enabling development which is climate-ready is aligned with existing City of Adelaide policy including:</p> <ul style="list-style-type: none"> - City of Adelaide Climate Change Strategy - Draft Carbon Neutral Council Road Map - Carbon Neutral Adelaide Action Plan 2016-2021 - Strategic Plan Green Theme - Resilient East Climate Adaptation Plan <p>Consideration of small-scale and small physical footprint renewable energy generation is also needed to enable City-scale renewable energy where and as appropriate to co-exist with existing built form and communities.</p>
	<p>Discussion Question:</p> <p><i>How should planning policy respond to growth in renewable energy – what issues should be addressed?</i></p>			<p>Current policy appears to have a large-scale facility focus for renewable energy. Policy should move towards renewable energy at different scales. Planning policy could enable options to pursue “micro grids” which are off-grid. Additional responses recommended by the Carbon Neutral Adelaide Action Plan 2016-2021 include:</p> <ul style="list-style-type: none"> - Foster design leadership in energy efficiency, reduced embodied energy and increase renewable energy systems in new developments. - Enable decentralised energy generation within significant development sites.

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				<ul style="list-style-type: none"> - Increase routine building construction and planning inspections for thermal performance, energy efficiency and sustainability. - Facilitate an energy hierarchy in the built form, including: <ul style="list-style-type: none"> o Low carbon design and construction measures o Passive design o Supplying energy efficiently including decentralised energy generation and embedded networks o Large scale renewable energy.
3.2 Adaptive Reuse	3B <i>There are opportunities for policy incentives to encourage adaptive reuse, particularly in relation to heritage or character properties that contribute to the amenity of an area.</i>	Identify further potential policy incentives that can promote the adaptive reuse of buildings.	Reform (Gen 1)	<p>It should be noted that adaptive re-use occurs constantly and when market forces allow it to occur. The re-use of buildings includes both heritage and non-heritage listed buildings and to state that adaptive reuse 'is underpinned by the increasing value attributed to the unique value attributed to the unique character and quality of older or heritage buildings' does not present the full picture.</p> <p>In addition, any conclusions drawn regarding the barriers in place regarding adaptive re-use need to be based on thorough research and then focus on changes to the planning and building rules in response. Currently research is being conducted via PhD research, Heritage SA, and a City of Adelaide research project. Additional research could be undertaken by State government to identify the outcomes from the "Minister's Specification for upgrading the health and safety in existing buildings, August 2017".</p> <p>There is potential for heritage buildings to benefit from more flexible land use planning and building rules, and standard policy provisions should be more flexible for heritage places if alternative performance provisions can be provided.</p> <p>Consideration for how to enable conversions of C&D grade office buildings to residential apartments is also required, for example how to manage the provision of open space requirements, without</p>

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				<p>resulting in poorly designed balconies being tacked on in response.</p> <p>Support investigating policy incentives to encourage adaptive reuse. A 2008 Study for the City of Adelaide investigated potential incentives and can be provided as an input. Whilst depending on the scope of policy, the heritage inquiry underway by the ERD Committee of Parliament may well also touch on the range of policy and non-policy measures to encourage adaptive reuse of heritage buildings.</p>
	<p>3C</p> <p><i>Consider the appropriateness of land division of surplus on-farm dwellings to promote ongoing use of valued heritage type buildings – provided it does not affect the long-term viability of farming activities.</i></p>	Review opportunities and investigate the appropriateness of including policies to facilitate the adaptive reuse of disused farm dwellings.	Reform (Gen 2)	No comment.
	<p>Discussion Question:</p> <p><i>Should existing unused farm houses be able to be separately titled to allow their adaptive reuse and to facilitate economic activity?</i></p>			No comment.
3.3 Infrastructure	<p>3D</p> <p><i>There is a variety of infrastructure-type zones across development plans and these can lack fundamental differentiation.</i></p>	Review and transition infrastructure-based zones to provide improved consistency.	<p>Transition ready</p> 	<p>'Planning Liveable Cities': A place-based approach to sequencing infrastructure and growth' released by Infrastructure Australia in December 2018 acknowledges the important role of economic and social infrastructure in enabling liveable places. Whilst the Planning, Development and Infrastructure Act 2016 provides head-powers for infrastructure, a place-based approach to identifying necessary infrastructure (including innovative ways of</p>

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	<i>These should be reviewed and potentially consolidated to provide overarching consistency and certainty.</i>			<p>provision) is needed in the planning system. As a minimum, the new Planning and Design Code should enable consent to be able to be readily granted for development applications, but a prior stage is suggested as needed as part of master planning or strategic planning for a place.</p> <p>The focus of the discussion paper is the provision of infrastructure for greenfield developments. With increased densities and the amount of infill development, the capacity of existing infrastructure within metropolitan Adelaide and the City will need to be managed to ensure it has the capacity to cater for increased use loads from potential growth. Infrastructure-specific zones may not be necessary in the City of Adelaide, however the provision of all types of infrastructure needed in the City is important.</p>
	<p>3E</p> <p><i>It is important to provide clear direction in regard to appropriate separation distances for infrastructure such as waste water treatment plants and power generation facilities.</i></p>	Review separate distances for infrastructure (e.g. utilities) and identify opportunities for appropriate uses within buffer spaces.	Reform (Gen 1)	<p>A city-scale approach to infrastructure needs to be taken in the City of Adelaide to achieve integrated, well-designed, safe and cost-effective outcomes to benefit all investors and users.</p> <p>Co-contribution for public realm infrastructure needs consideration. More up-front planning on trunk infrastructure e.g. utilities to service new development is needed.</p> <p>The Code could also be utilised to support micro-infrastructure rather than only large-scale infrastructure. The look and placement of telecommunication towers and installations in the City requires consideration of the appropriate level of control.</p>
	<p>Discussion Question:</p> <p><i>How can we ensure that land use planning is able to accommodate and support the provision of new and innovative infrastructure?</i></p>			<p>A more robust policy amendment process could assist the provision of new and innovative infrastructure, including considered linking of regional and local infrastructure plans with the planning system.</p> <p>Opportunities to link the e-planning system to spatially link to infrastructure planning and delivery could also be contemplated.</p>

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THEME 4: FACILITATING INNOVATION AND ENABLING INVESTMENT				
4.1 <i>Collaboration and clustering</i>	4A It is important to find the balance between policy certainty and policy flexibility in zones that support economic development and clustering.	Explore options and identify opportunities for improved policies for specialist development clustering within a zone (including business ecology precincts).	Reform (Gen 1)	<p>The Planning and Design Code will need to respond to key infrastructure initiatives such as the City of Adelaide's bespoke "Ten Gigabit Adelaide" project. It is allowing city-based businesses to connect to a dedicated fibre-optic network and access a range of cloud-based services at phenomenal 10Gbps symmetrical data speeds that bypass traditional internet connections, with exclusive access and connectivity to other city-based businesses.</p> <p>The infrastructure is being physically rolled out to 1000 commercial buildings across the CBD. It makes connected buildings more attractive to tenants. Such key infrastructure should also be recognised in strategic infrastructure planning and regional planning initiatives as the PDI Act is progressively implemented.</p> <p>As more businesses become connected to Ten Gigabit Adelaide, the city will lead the way as one of the fastest and most affordable connected cities in the world. Each service in the Ten Gigabit Adelaide suite has its own, dedicated and uncontested connection, meaning businesses can access via a clean, super-fast, low-latency connection. The services suite enables businesses to choose one or many services, each with a fast, clear and reliable path. The services include:</p> <ul style="list-style-type: none"> • Private network links • Cloud connections • Adelaide business to business • Voice and video

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				<ul style="list-style-type: none"> Internet Special services Tailored connectivity
	<p>4B</p> <p>There is a need for consideration of new manufacturing technologies (that are not dirty, noisy, smelly or impacting) which potentially allow for a mix of uses in residential land business zones.</p>	Review and refine SAPPL policies that support and encourage the adoption of emerging technologies and ensure flexibility to accommodate future ones in land use design and development.	Reform (Gen 1)	Land use definitions and how they are modernised and integrated within the new system are of critical importance and require due attention during the creation of the P&DC. For example, the current definition of “Industry” conflicts with the stated intention of providing for new manufacturing technologies which are not dirty, noisy, smelly or impacting.
	<p>Discussion Questions:</p> <p><i>Do we have adequate planning policies in place to encourage/support the aims of innovation districts?</i></p> <p><i>How do we ensure that residential development does not monopolise the offering in mixed-use areas of innovation districts?</i></p>			<p>Planning policy should ensure adequate data networks to attract clusters e.g. 10 Gigabit Adelaide project?</p> <p>The key is to be clear that ‘mixed use’ is the goal of the area and to have sufficient policy to ensure that outcome. For example, policy requiring that ground level uses should be non-residential, and that a proportion of a multi-level building be non-residential use. The Capital City and City Frame Zones are examples.</p> <p>Potential to foster innovation in the affordable housing stream should also be considered, particularly considering collaborative projects with the City of Adelaide such as “Project Zero” which aims to address homelessness in the City.</p> <p>Given that international students play an important role in the South Australian economy, it is important that quality student accommodation is available. The P&DC needs to ensure that appropriate planning and design standards are in place to ensure quality accommodation is provided in the City of Adelaide which is suited to student needs. Consideration of whether university</p>

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				campuses should have the ability to provide student accommodation on site could also occur.
4.2 E-commerce and a sharing economy	Planning processes, policy formulation and regulatory structures all need to be reviewed and, where appropriate, redesigned to take advantage of the development opportunities presented by e-Commerce in a safe, equitable and orderly manner.	Continue to further investigate the anticipated impacts of e-Commerce and respond to these in future generations of Code policy as appropriate.	Reform (Gen 2)	City of Adelaide is interested in continuing to shape and influence the e-commerce and sharing economy sector, noting that the timing of investigations into 4.2 is intended to occur as part of "Reform (Gen 2)". As such it is understood that this research is unlikely to occur until post-2020 at the earliest. City of Adelaide is keen for the Planning and Design Code to enable and not stifle innovation in this area.
	<p>Discussion Questions:</p> <p><i>Does planning policy need to respond better to new ways of doing business such as the emergence of the sharing economy – which may require the introduction of controls to mitigate previously unanticipated effects (for example, the conversion of long term rentals into short stay holiday accommodation via online platforms)?</i></p> <p><i>What will be the emerging industry impacts of e-Commerce and how should these be managed by the Code?</i></p>			<p>City of Adelaide agrees that planning policy needs to respond better to new ways of doing business, and again emphasises the need to review and update land use definitions which are used by the planning system. It may also be advantageous to build-in regular review and update of definitions in say a 5-year cycle so that policy stays relevant to the needs of business. The planning system is currently working with definitions which were written over 20 years ago and no longer "fit-for-purpose" in some instances.</p> <p><u>Short-stay Accommodation via On-Line Platforms</u></p> <p>The City of Adelaide supports the provision of short-term accommodation and the accommodation sharing industry. This is defined as where property owners make space available in part or all of their dwellings for short-term rental to paying guests, generally organised through companies. Some hosts lease rooms while others lease entire dwellings.</p> <p>The relatively low number of applications for serviced apartments indicates few properties are being used this way. However, this contrasts with estimates that up to 1000 properties are available</p>

DPTI Sub-Theme	Ref No /DPTI key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>for short-term accommodation in the City. It may be that hosts are unaware that allowing their dwelling to be permanently used for short-term accommodation, requires a development application. Generally, the commencement of short-term accommodation is reported by neighbours only when amenity is impacted.</p> <p>Problem properties typically display the following themes:</p> <ul style="list-style-type: none"> - A lack of involvement by the company providing the accommodation and/or the owner/manager in vetting guests or policing the terms of leasing agreements - Not occupied by their owners - Rental time of two (2) days or less - Accommodation offered for significant numbers of guests with limited on-site parking - A rental fee that is at the less expensive end of the range. - The location of the property plays a part in that centrally located properties that allow guests to walk to and from 'home' can be more problematic. <p>Council cannot ask for a development application seeking consent as a 'serviced apartment'. The Adelaide (City) Development Plan anticipates 'serviced apartments' as an envisaged development in most of the City (other than the Park Lands and Institutional Zones north of North Terrace). If a development application for 'serviced apartments' is granted development approval, conditions could be attached., and the onus will fall on Council to monitor whether other conditions are being met and if not, take enforcement action under the <i>Development Act 1993</i>.</p> <p>City of Adelaide is also interested in how short-term accommodation will be addressed within land use definitions, e.g. will it be included in the definition of tourism accommodation?</p>

DPTI Sub-Theme	Ref No /DPTI key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p><u>Sharing Economy / e-Commerce</u></p> <p>Consider the adoption of a risk-based approach to sharing economy to enable planning policy to “stand back” and enable innovation.</p> <p>E-commerce and the sharing economy enable opportunities for business, be it in a residential premises or business premises. E-commerce and the sharing economy are trends that the planning system needs to continually monitor, such as via targeted research investigations.</p> <p>The impacts of short stay accommodation via on-line platforms is a current example of a trend arising from the sharing economy. It may be that certain impacts need to be considered via regulatory or policy tools other than the planning system. Looking ahead, autonomous vehicles are emerging as a trend which will need consideration around, for example, parking rates.</p> <p>‘Data centres’ are land uses which process data and need to be in proximity to where most data is needed. A number have been established in the City and the new Planning and Design Code should consider these land uses into the future.</p>

Attachment D



CITY OF
ADELAIDE

Enquiries: Shanti Ditter (8203 7756)
Reference: ACC2018/01368


12 November 2018

Mr Michael Lennon
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Dear Mr Lennon 

Response to Policy Discussion Papers: Integrated Movement Systems and Natural Resources and Environment

The City of Adelaide values and appreciates the opportunity to continue to provide input and feedback to documents that are informing the creation of the State's new planning system.

The *Planning, Development and Infrastructure Act 2016* (SA) requires the existing 72 Development Plans across the State be transferred into one cohesive and effective Planning and Design Code (P&D Code) by 1 July 2020. This is an ambitious and commendable goal, albeit an enormous challenge. Getting the policies in the P&D Code right, and in line with the envisaged improvements anticipated by the Expert Panel is critical to the future success of the P&D Code and broadly to South Australia's planning system.

Reflection on the Community Engagement Approach

A major inclusion in the *Planning, Development and Infrastructure Act 2016* (SA) (PDI Act) is the Community Engagement Charter. An object of the PDI Act places emphasis on engaging communities early, to, 'provide a scheme for community participation in relation to the initiation and development of planning policies and strategies'.

Council continues to be concerned that the approach to engagement activities is not adequately demonstrating a commitment to the principles of the Community Engagement Charter. Our concerns relate to a number of areas, as follows.

Firstly, the 'Integrated Movement Systems Discussion Paper' and 'Natural Resources and Environment Discussion Paper' have not been consulted on by the Commission with guidance from a community engagement plan developed from the Community Engagement Charter. Whilst these papers are not in themselves statutory documents, they will directly inform the P&D Code which is a statutory document and it is our view that the Community Engagement Charter should have applied regarding the consultation of these documents. Therefore, it is our view that consultation on these papers has not met the intent of the Expert Panel, PDI Act or Parliament and is not in the spirit of the Community Engagement Charter.

Secondly, we understand the Commission is likely to release two additional discussion papers in November 2018 titled; 'Productive Economy' and 'People and Neighbourhoods'. Feedback on these papers is expected to be due in February 2019. These additional papers are meant to be read as a family with the 'Integrated Movements Systems' and 'Natural Resources and Environment' papers. As such, Council will take the opportunity to review and amend feedback on the subject papers when the additional papers are released.



According to DPTI's Planning Reform Calendar, community engagement for the draft P&D Code is scheduled to commence in February 2019. If this is the case, then comments on the 'Productive Economy' and 'People and Neighbourhoods' paper will have no opportunity to meaningfully influence the drafting of the P&D Code. This is of great concern and disappointment to Council that the objects of the Act, intent of Parliament and spirit of the Community Engagement Charter is not being realised.

Key Feedback on the Discussion Papers

The Discussion Papers make recommendations about the transition of contemporary policy into the P&D Code as well as suggesting where policy reform is needed for the first and future generations of the P&D Code. However, the Discussion Papers do not indicate the proposed timing, process and community engagement plan for future generations of the P&D Code. Additionally, the Discussion Papers do not provide the proposed policies, rather statements of intent, making it difficult to determine the implication to Council of delaying some policies to future generations.

We have reviewed, discussed and collated feedback from across Council in relation to both papers. For both papers, there is significant potential to incorporate the recommendations and strategies of existing key City of Adelaide documents within the P&D Code. These documents include, but are not limited to:

- City of Adelaide Strategic Plan 2016-2020
- Carbon Neutral Adelaide Action Plan 2016-2020
- Active City Strategy 2013-2021
- Experience Adelaide: Adelaide City Retail Strategy 2015-2020
- Smart Move: City of Adelaide Transport and Movement Strategy 2012-22, including Smart Move Interim Action Plan 2016-2018
- City of Adelaide, Adelaide Design Manual
- City of Adelaide, Integrated Biodiversity Management Plan 2018"

The City of Adelaide supports in principle the key recommendations of the Integrated Movement Systems Discussion Paper and supports the aspirations of the Natural Resources and Environment Discussion Paper. However, we do have some concerns related to missed opportunities of delaying transition of some policies. Please find attached the City of Adelaide's detailed feedback on the 'Integrated Movement Systems Discussion Paper' and 'Natural Resources and Environment Discussion Paper'.

We welcome the opportunity to discuss our feedback with you in more detail, and to actively consider opportunities to continuously improve the ongoing implementation of the PDI Act.

Please contact Shanti Ditter, Associate Director Planning and Development on 8203 7756 or s.ditter@cityofadelaide.com.au to arrange a mutually convenient time to discuss this further.

Regards

[DELETED]

Mark Goldstone
Chief Executive Officer



RESPONSE TO INTEGRATED MOVEMENT SYSTEMS DISCUSSION PAPER

Integrated transport solutions can be curated to serve the City's needs for employment, entertainment, residential population and as the centre of the State's transport system. With strategic goals of increasing the visitor, workforce, student and residential population with an aging demographic, there will be a continual need to enhance and maintain mobility options for all.

The *Planning, Development and Infrastructure Act 2016* (SA) offers some significant opportunities to work with emerging technologies and support integrated transport solutions. The Act provides opportunities to better manage the off-site impacts of development and the full strength of these powers should be explored to support productivity and liveability.

Key comments on the 'Integrated Movement Systems Discussion Paper' from the City of Adelaide are summarised below by theme. Detailed comments are included in the attached Table – City of Adelaide Response to Integrated Movement Systems Discussion Paper.

THEME 1: Aligning South Australia's growth with transport infrastructure

- a) The proposal to include higher density mixed use zones from the SAPPL into the P&D Code is supported as most of the City's new residential development is high density in nature and supports the efficient utilisation of transport infrastructure.
- b) Seek further discussion and consultation to ensure that additional density does not create an oversupply of apartments that will undermine the City of Adelaide growing its residential population and compromise liveability, City activation and vibrancy.
- c) Seek that high-density nodes be established in locations that are most appropriate. It is suggested that the use of public transport accessibility rating be undertaken to identify locations already well serviced and thus best suited for increased density development as nodes and corridors.
- d) Maximise the benefit of good accessibility to high density nodes by ensuring that they are the primary location for retail, personal services, community and employment activities.

THEME 2: Capitalising on strategic transport infrastructure

2.1 Strategic Transport Facilities

- a) The City of Adelaide believes that greater certainty for developers and the community regarding development heights and design as dictated by Adelaide Airport operations is needed. Closer policy alignment with the national PANSOPS and DOTARS requirements under Commonwealth legislation would be beneficial.

2.2 Strategic Transport Corridors

- a) It is suggested that a clear, detailed and long-term transport structure plan, informed by ITLUP be used to protect major transport facilities and major transport routes.

- b) Council suggest that further research into emerging transport technologies should be undertaken to ensure that policies are adaptable, inclusive and anticipatory. Autonomous vehicles, Mobility-as-a-Service providers, electric vehicles and the like have the potential to significantly alter movement patterns, volumes, pollution and noise generation.

THEME 3: Sustainable mobility, car parking and the impact of technology


3.1 Walking, cycling and other non-motorised transport

- a) Regard should be had to the unique position of the City of Adelaide as having high levels of walking, cycling and public transport usage.
- b) Every major street in the City needs to support pleasant safe and efficient pedestrian, cycling, public and private transport movement.
- c) The Code should enable on-site car parking to be reduced in line with the amount of alternative transport options available.
- d) Agree in principle that the Code should more explicitly plan for an aging population. However, an object of the *Planning, Development and Infrastructure Act 2016* (SA) (section 12(2)(d)) is to promote universal design that will ensure that all members of the community from childhood to aged are designed for. These principles should be embedded throughout the P&D Code.

3.2 Car Parking and Emerging Mobility Technology

- a) Support policies that require new development to be designed for adaptive reuse. In the City context such flexibility will support the commercial, education and residential sectors.
- b) Support innovative design and other transport options, particularly where they can reduce congestion, noise and pollution.
- c) Whilst the City of Adelaide recognises the impetus to achieve greater standardisation for car parking rates, suggest that a review of car parking rates in the metropolitan area should differentiate between different urban typologies (e.g. inner, middle and outer urban locations) to ensure that appropriate rates are arrived at.

City of Adelaide Response to Integrated Movement Discussion Paper

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
THEME 1: Aligning South Australia's growth with transport infrastructure				
<i>Supportive Land Use Policy Zones</i>	1A <i>In 2012, a suite of higher density, mixed use zones were introduced into the SAPPL which have been spatially applied to a small number of areas adjacent to key transport corridors and centres. These zones help to integrate land use and transport systems and can provide the foundation for this outcome in the new planning system.</i>	<i>Transition zones that promote improved integration of land use with major transport corridors (for example: Urban Corridor Zone, Urban Core Zone, Residential High Density Zones and Mixed Use Zones). The spatial application of these zones is unlikely to be substantially changed as part of the application of Generation 1 of the Code.</i>	Transition ready 	<p>Much of the City of Adelaide falls within the suite of higher density, mixed use zones that should be considered as part of planning for improved transport infrastructure.</p> <p>Zoning is one action that can support the delivery of improved transport infrastructure. Decisions around timing of delivery of transport infrastructure needs to also be aligned to promote growth in local areas.</p> <p>The City of Adelaide would welcome new mechanisms to be explored (e.g. infrastructure schemes) to enable greater accessibility and delivery of enhanced infrastructure for residents, workers and visitors.</p>
<i>Minimum population targets for existing Zones</i>	1B <i>A minimum threshold of population density to ensure public transport and local shops and services are viable and can be located within walking distance of where people live needs to be identified.</i>	<i>Review the inclusion of minimum net residential densities in Suburban Neighbourhood Zones, Urban Core Zones, Urban Corridor Zones and Suburban Activity Node Zones. Further discussion and consultation needs to be undertaken to</i>	Reform (Gen 1)	<p>Where aligned to clear strategic objectives, minimum net residential densities are supported.</p> <p>The need for any additional density in other areas should follow studies to understand the land economics to ensure that:</p> <ul style="list-style-type: none"> (a) over-capacity is not created, thereby scattering redevelopment and undermining the ability to achieve transport viability; (b) new supply does not compromise existing areas such as the City of Adelaide such that its targets for density are not achieved; and (c) maintain market competitiveness.

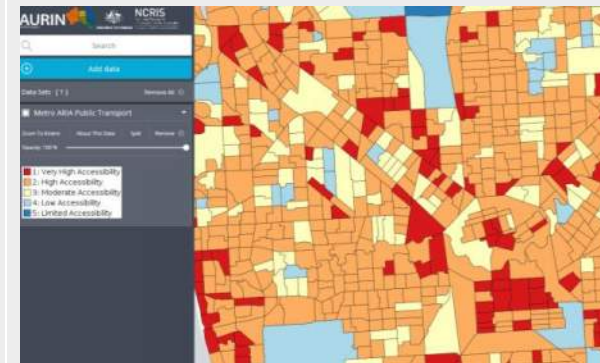
Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
		<i>identify the appropriate net residential densities in the context of evolving demographics, market dynamics and development.</i>		
<i>Utilise existing transport corridors</i>	1C <i>Some transport corridors are currently underutilised and could benefit from better integration with supporting land uses.</i>	<i>Investigate the spatial application of higher density mixed-use zones (such as those listed above) along appropriate key transport corridors, adjacent activity centres, in urban renewal areas and key strategic sites.</i>	Reform (Commence Gen 1)	<p>Zoning changes within the City of Adelaide in the last 5 or so years have provided the zoned capacity to better utilise existing transport infrastructure.</p> <p>It is suggested that further zoning initiatives consider higher density around transit nodes rather than corridors. Development around nodes rather than corridors provides opportunity to improve walkability, local amenity and improve the efficiency of the movement corridor (i.e. fewer stops along a corridor based on nodes rather than spreading along an entire corridor). This could also increase the catchment to transit rather than along corridors where there is no opportunity to connect with the transport service.</p> <p>New development within these zones should provide Integrated Transport Plans to ensure that development makes best of use its location close to transport infrastructure to reduce unnecessary trip generation and encourage an appropriate mode split.</p> <p>The new legislative framework needs should explore the opportunity to utilise value capture methods, amongst others, to enable the provision of transport services that support higher densities.</p>

Complementary policy for density

What other policy provisions are needed to facilitate good quality development that supports the desired minimum residential densities in key zones?

All communities should have access to services, education, employment, retail, open space and community facilities.

An accessibility rating tool could be developed to guide development assessment decisions and support investment. Other cities use their public transport accessibility rating (index) to coordinate density with transport provision. This recognises developments role in supporting the improvement of public transport. The Policy should link current levels of accessibility (see image below) and desired future levels of public transport to identify responsive development solutions.



Source: Auren.

Accessed from <https://map.aurin.org.au/>

Where density is located in areas where public transport is not locally provided / available, there is a need to ensure communities are supported by a range of mobility options to access such services.



The following policy provisions are suggested as ways to facilitate good quality development that supports liveability:

- High trip generating land uses be located in high transit locations such as main streets and centres. This will support infrastructure provision and ensure communities stay connected.


Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<ul style="list-style-type: none"> • Suggest investigating mechanisms under the new PDI Act to deliver timely outcomes of transit connectivity. • Ensure new policy enables a variety of transport solutions, such as carpooling and cycling connections, to be considered as appropriate means by which to provide for movement needs for a development. • Permit land uses in highly accessible locations to decouple themselves from on-site car parking requirements provided alternative mobility options are available. <p>Elevate pedestrian planning in assessment to support urban design that supports walking and great places for community life. Some important policy amendments to be considered are:</p> <ul style="list-style-type: none"> • Seek increased activity on streets by prioritising land uses on street frontages and discouraging inactive uses such as car parking. • Adopt appropriate street hierarchy policies that minimise land uses and activities that hinder mass-transit services and focus them on streets that do not host mass-transit (e.g. Waste servicing, loading, taxi ranks, etc.). The City of Adelaide has a street hierarchy plan of this nature. • Improve the permeability of <i>higher density mixed use zones</i> through improving existing street networks and enabling the creation of additional mid-block links to increase access to existing and future transit nodes (transit stops) and reduce walking distance. • Building interface design standards are required to ensure that the public realm is not only functional but also pleasant, active and interesting. The Adelaide Design Manual: Building Interface Guidelines should be used to form the basis of improved design policy. This document should be used as a guide in the development of 'Design Standards' under the Code.

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
SAPPL adequacy and new options	<i>Does existing policy within the SAPPL adequately address issues relating to the perceived quality and impacts of higher density development? For example, the integration and cumulative impacts of parking and vehicle movement, public realm, and promote or incentivise better outcomes? streetscape interface). How might targeted policy reform promote or incentivise better outcomes?</i>			<p>Adopting higher density in and of itself requires developers to deliver a product that by default, must be contextual, finely detailed, efficient and incorporate good design to succeed in an increasingly sophisticated marketplace.</p> <p>Council questions why there is a view that incentivising better outcomes is required to achieve good outcomes. Development has a responsibility to support quality outcomes for the benefit of achieving maximum development capacity. Clearer principles with a stronger mandatory approach should be considered.</p> <p>Presently the SAPPL approach does not assist in balancing transport infrastructure with competing requirements; waste storage and servicing, egress provision, infrastructure services, aesthetic presentation, etc.</p> <p>Traditional approaches to planning policy relies on a development sites managing all the impacts of development within the site (refer Appendix 1). Our experience in the City is that few developments can successfully resolve the accumulative impacts within their sites. In high density city environments with high trip generating land uses, this is not an efficient way of supporting infill as it limits high quality outcomes and good approaches to urban form and design and integrated transport planning.</p> <p>For example, in high density commercial areas and in a context of adapting existing buildings for new uses, not all sites can resolve the waste, loading and servicing needs on site without negatively impacting the surrounding environment. This is particularly the case on small to medium sized sites. This is an impediment to redevelopment. This is most evident in main streets and strip commercial areas. Alternative solutions based off-site should be worked through to unlock development potential and support a compact and attractive urban form.</p>


Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>Refer to Appendix 2 – Recent Developments - Case Studies of New Apartment Blocks.</p> <p>The SAPPL could be improved through the following suggestions:</p> <ul style="list-style-type: none"> • Suggest developing policies that support off-site and shared loading, waste servicing, car and bicycle parking, end of trip facilities (lockers and showers). • Development policies should also be linked with infrastructure improvements and contributions to avoid an infrastructure and services lag and poor travel behaviour. • The SAPPL should recognise and be responsive to emerging technologies. • Design standards need to be developed to ensure buildings are adaptable, reducing the risk of becoming stranded assets. For example, many car parks incorporate setbacks, floor plates, ceiling heights, ventilation and ramps that do not easily support alternative land uses. • Servicing and loading modules should be addressed in conjunction with accessibility policies to avoid 'last mile' bottlenecks in goods deliveries and collections. • Waste Policies – The City of Adelaide endorses the South Australia "Better Practice Guide Waste Management for Residential and Mixed Use Development" prepared in conjunction with the Property Council, Renewal SA and Green Industries.

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
THEME 2: Capitalising on Strategic Transport Infrastructure				
2.1 Strategic Transport Facilities				
<i>SAPPL Airfield Zone</i>	2A <i>The SAPPL contains an Airfield Zone which seeks to protect the ongoing operation of airport facilities and manage the interfaces with surrounding land uses. There is an opportunity to expand policy for appropriate complementary development types.</i>	<i>Transition the policy intent of the Airfield Zone and review the permissible uses in these zones to better support complementary development types. Work with Adelaide Airport Limited, City of West Torrens and other stakeholders within the vicinity of strategic airports</i>	Transition ready 	Support in principle. Airport impacts such as noise and vibration need to be managed under other legislation. Standards need to future proof areas from the Airport Strategic intentions.
<i>Freight</i>	2B <i>With the changing nature of the ways freight is moved, there is an opportunity to review the planning policy in relation to the operation of intermodal facilities and freight transport hubs, including their potential future expansion.</i>	<i>Review and Transition the Intermodal Policy Area into the equivalent zone.</i>	Transition ready 	Support in principle.
<i>Consistency with Federal Guidelines on Airports</i>	2C <i>The application of planning policy for airports varies considerably across the state. A key opportunity will be to improve policy consistency with Federal Government guidelines on airports.</i>	<i>Review the SAPPL building near airfields and building heights policies and mapping to respond to the NASF Guidelines.</i>	Reform (Gen 1)	Support in principle.

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
<i>Protecting ports</i>	2D <i>Protecting ports from encroachment from incompatible land uses is becoming increasingly important to protect their current operations, critical transport links and future expansion opportunities.</i>	<i>Review the range of zones and policy areas that apply to seaports and supporting infrastructure to ensure that policy is fit for purpose.</i>	Reform (Gen 1)	Support in principle.
<i>Balancing land uses near airports</i>	<i>How should planning policy balance the need for airports in strategic locations against the impact of these facilities on adjacent land owners?</i>			<p>Planning policy should guide development to avoid unreasonably restricting future development of the airport, a large piece of strategic infrastructure.</p> <p>Permissible building heights within the City of Adelaide are bound by impacts on airport operations. At present, permissible building heights for the Central Business Policy area of the Capital City Zone and some other locations are determined by impact on airport operations.</p> <p>This provides flexibility to support the city centre growing as a most intense urban area of the State reflecting its role as a capital city, however this approach provides little certainty for all stakeholders on a likely future development outcome.</p> <p>A re-zoning proposal that has the potential to the operation of strategic airports should consider its potential impact.</p>

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
2.2 Strategic Transport Corridors				
<i>Road widening</i>	2E <i>Currently, the spatial extent of land required for future road widening requirements is not included in Development Plans.</i>	<i>Work with DPTI Transport to review, transition and map road widening provisions and investigate whether they can be incorporated as an overlay or similar in the Code.</i>	Transition ready 	Supported including policy that provides long term direction for an area to enable community and investment certainty.
<i>Land use integration.</i>	2F <i>Moving into a new planning system, there is a need to ensure that land uses are appropriately supported by transport options and that our transport corridors remain efficient.</i>	<i>Transition the Policy intent of the existing strategic Transport Routes Overlay. This will involve:</i> <ul style="list-style-type: none"><i>• reviewing policy and mapping for strategic transport corridors</i><i>• refining policy (where required) with regard to access requirements, freight routes and road hierarchy. Targeted consultation with affected stakeholders plus general engagement as part of the Code development.</i>	Reform (Gen 1)	Supported in principle. See above 2E

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
<i>Major Transport Facilities</i>	<i>How can the Code work to protect the operation of major transport facilities whilst managing the impacts on adjacent development opportunities?</i>			<p>A clear and long-term transport structure plan should be used to guide appropriate land use and transport decisions.</p> <p>The life of roads needs to be considered also, in line with draft SPP 11.4. Disruptions due upgrades and maintenance could be reduced with improved forward planning.</p>
<i>Impacts on transport corridors</i>	<i>How can planning policy better manage and minimise the impacts of transport corridors on surrounding development (i.e. noise and air pollution for residents)?</i>			<p>A clear long-term transport plan can better foresee future conflicts before they arise.</p> <p>This must be considered to ensure draft SPP 11.5 is properly included within the P&D Code.</p> <p>Existing and emerging technologies and mobility solutions ("Mobility-as-a-Service" (MaaS)) need to be supported to reduce the environment impacts of vehicles and reduce impacts of congestion such as noise and air pollution.</p> <p>Planning's role in this is to:</p> <ul style="list-style-type: none"> • Allow for flexible transport solutions beyond private vehicles • Enable developments to decant parking outside their sites • Support the uptake of electric vehicles through charging points and stations • Reduce private vehicle parking where supported by other transit options • Supporting car share and other transit solutions • Continue to support walking and cycling through adequate bike storage, secure parking, end of trip facilities and the provision of safe, pleasant walking and cycling routes.

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
THEME 3: Sustainable mobility, car parking and the impact of technology				
3.1 Walking, cycling and other non-motorised transport				
<i>Walking and Cycling</i>	3A <i>The current walking and cycling SAPPL policy is well placed to be transitioned into the Code.</i>	<i>Transition the SAPPL off-street bicycle parking and the end-of-trip facilities (such as showers, changing facilities and clothes storage).</i>	Transition ready 	<p>Support in principle, however the City of Adelaide has a different transit context as the highest workforce concentration and best mode split for journey to work in the State.</p> <p>The City of Adelaide has higher rates of cycling and walking to support this mode split and these should continue to be bolstered.</p> <p>The planning system needs to be adapted to enable the provision of shared facilities where not proposed / or able to be supported by individual businesses particularly on small sites.</p>
<i>Cycling Routes</i>	3B <i>Cycling routes are not universally incorporated into Development Plans. This leads to inconsistency of application of design rules etc. relating to cycling.</i>	<i>Incorporate identified cycling routes into the Code.</i>	Reform (Gen 1)	<p>The Adelaide (City) Development Plan includes a map with cycling routes (see MAP Adel/1 (Overlay 3) – Bicycle Network.</p> <p>This map is in need of an update but is important to retain to support cycling as a form of transport.</p> <p>In addition to identified of the cycling route, policy is needed to ensure development responds to its context along a cycling route.</p>
<i>Walking and cycling</i>	<i>How can planning policy better enable the delivery of more walking, cycling and active travel opportunities in our neighbourhoods?</i>			<p>A preferred mode-split for projects should be adopted based on the available transport options and land use mix in a precinct / locality.</p> <p>For example, in the Capital City Zone within the City of Adelaide there would be a low, or no, requirement for on-site car parking given the accessibility to a range of other transport alternatives. In this situation a high level of individual on-site car parking is undesirable as it conflicts with other modes of transport.</p> <p>The design of development plays an important part in encouraging safe, comfortable and interesting pathways for people that encourages more walking.</p>

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
<i>Link and Place</i>	<i>How can planning policy assist in balancing the tensions between prioritising the movement of vehicles (Link) and the quality of the space for pedestrians (Place) along our streets?</i>			<p>A clear hierarchy of streets should be embedded in the Code. The City of Adelaide has prepared the Adelaide Design Manual to identify the future role of the streets.</p> <p>Building Design should incorporate the experience of pedestrians as a priority. This would recognise walking as a legitimate mode of transport and primary method of accessing urban spaces.</p> <p>As places increase in density, design requirements should reflect and support a more fine-grain level of activity.</p>
<i>Streets and Public realms</i>	<i>How can the Code promote development that contributes positively to streets and the serviceability and quality of the public realm?</i>			<p>The Code needs to require services be integrated to reduce the impact at street level (e.g. on-street car parking, public transit stops).</p> <p>Recognition that in high density areas such as the City, high pedestrian volumes, historic streetscapes, high-value retail frontages and existing transport infrastructure (bus stops, trams stops and cycling infrastructure) will preclude on-site provision of vehicle parking.</p> <p>Many road corridors have extensive infrastructure, limiting space for on-street improvements such as greening or footpath widening. The Code should support developments which provide improvements on-site adjacent to the public realm that create amenity in the space (e.g. landscaping, seating, public art).</p> <p>The Code should identify building forms that are best suited for certain streets and where servicing can best occur to enable coordinated public realm design.</p> <p>As density increases in the City it is important that performance guidelines are in place to address on-site servicing infrastructure such as telecommunications, fire, electricity and waste. It is the City of Adelaide experience that successful outcomes result from</p>

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>upfront consideration in the design process. Refer to Appendix 2 - Case Studies of Pedestrian Experience</p> <p>The Planning and Design Code policy should reference the “South Australia Better Practice Guide Waste Management for Residential and Mixed Use Developments”, which are consistent with the guidelines created by the City of Adelaide.</p>
	<p><i>Does the Code need to more explicitly anticipate the needs of an aging population through provision for things like mobility scooters or access vehicles?</i></p>			<p>Yes, universal design is an object of the PDI Act and should be embedded throughout the P&D Code. Draft SPP 11.1 also broadly requires that the P&D enables safe transport options for all.</p> <p>The Code should encourage development that incorporates Universal Design principles to ensure useability for all people, including the aged. Developments should demonstrate how people will age in their buildings and maintain mobility. Features such as adequate widths of corridors and entries for scooters and other mobility aids, charging points and storage areas.</p> <p>Provision of parking for access vehicles may be required off-site or on-site. For instance, people with higher needs will need support staff to assist. On-site solutions should be sought where possible.</p> <p>Common storage areas may also assist service providers, particularly in apartment buildings.</p> <p>Off-site solutions should be considered and the utilisation of the legislation that will enable shared off-site solutions in a co-ordinated manner.</p>
3.2 Car parking and emerging mobility technology				
Adaptive reuse	<p>3C</p> <p><i>As travel behaviours continue to change, the demand for car parking will</i></p>	<p><i>Transition the existing SAPPL policy on the design of car parking structures so they</i></p>	Transition ready	<p>Supported.</p> <p>Land use mix will change over time and it important that designs are able to cater to changes in waste, loading and servicing.</p>

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<i>also change. It is important that new buildings and structures, particularly multi-level car parks, are adaptable for future uses.</i>	<i>are adaptable for new uses in the future.</i>	✓	<p>Businesses will change the way they operate in accordance with economic forces. The City experience is that retail servicing has changed considerably in the last 5 years. Not only are buildings receiving goods they are also distributing goods.</p> <p>It is important that designs are adaptable to accommodate various uses.</p>
<i>Innovative design and other transport options</i>	3D <i>Car parking rates in current planning policy are often inflexible and do not consider innovative design or proximity to other transport options.</i>	<i>Rationalise and transition existing car parking rate policies which allow for variation to prescribed minimum parking rates for development proposals which satisfy specific design and transport option criteria.</i>	Transition ready ✓	The Adelaide (City) Development Plan has flexible policies in relation to car parking (e.g. no minimum requirements for residential for much of the city). Our experience is that, car parking continues to be supplied without being adaptable to future uses, future technologies and are in prominent locations that do not support public life. This flexible approach should continue and be further supported into the future.
<i>Carparking rates</i>	3E <i>There is potential for greater standardisation of car parking rates, while still allowing for different rates for conditional and geographical contexts.</i>	<i>Review and consult on car parking rates in Greater Adelaide and regional centres to identify opportunities for greater standardisation through the Code, where appropriate.</i>	Reform (Gen 1)	<p>Supported. See Pages 4 and 11 of this Table about accessibility ratings and mode split.</p> <p>The Code should recognise the unique situation of the City of Adelaide arising out of the high-density environment and concentration of public transport routes. Application of a standard rate that is more appropriate to the wider metropolitan area may not be appropriate.</p> <p>Suggest that car parking be incorporated into a module that considers all movement and accessibility needs of a development.</p> <p>Other modes and technologies to support a balanced transport solution for a development should be included. For instance, policies that reduce on-site car parks inversely based on the</p>

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				number of alternatives provided should apply (e.g. scooter and motorcycle parks, bicycle parks, car share spaces).
<i>Future proofing neighbourhoods</i>	3F <i>Planning policy has a role to play in encouraging and supporting the uptake of technology which helps future-proof our neighbourhoods.</i>	<i>Develop policy that encourages new developments, in higher density or mixed use zones, to incorporate electric vehicle charging provisions and ensure appropriate infrastructure is in place.</i>	Reform (Gen 1)	Supported. Rather than being spatially defined, all transport policies future proofing to ensure that areas are not left lagging in infrastructure provision and potentially disadvantaged.

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
<i>Emerging technologies</i>	3G <i>It is important to ensure that planning policy is in place to help facilitate the uptake of emerging technologies that support better car parking efficiency.</i>	<i>Develop policy for new car parking areas (of a certain size) which encourages the adoption of technologies which can better manage impacts.</i>	Reform (Gen 2 and beyond)	<p>Supported if the sequencing is brought forward to Gen 1.</p> <p>The City of Adelaide has had strategic policy in that supports emerging technologies; Smart Move Strategy (2012), Smart Move Interim Action Plan (2016) and the Carbon Neutral Action Plan (2017). The City of Adelaide is ready to support emerging technologies to capture the economic benefits of the new technology.</p> <p>Adelaide is competing for investment and to maintain its profile as a world class city. There is a need to support emerging technologies to keep pace nationally and internationally. Given that Gen 1 is scheduled for mid-2020, there is a significant time delay. The implications of not supporting the development pipeline with emerging technologies could be detrimental to the State economy. Conversely, supporting these technologies could ensure that transport planning contributes to maintaining and raising the City and State's economic and liveability performance.</p>
<i>Emerging technologies</i>	<i>How can planning policy best respond to the impact of emerging technologies on our city and communities and how we move to and through them?</i>			<p>Whilst planning policies need to be somewhat defined, policies relating to transport will need to be more open and flexible than other policies, to allow for emerging technologies to mature.</p> <p>Transport policy should support modal split for new types of movement systems. In addition, policy should encourage building design that incorporates flexibility to accommodate mobility technologies.</p>
<i>Area based needs</i>	<i>How can the Code best respond to the variances in car parking requirements for different neighbourhoods?</i>			<p>This question should be broader and examine transport requirements based on an area's accessibility. If alternative transport solutions are available within a locality, this needs to be accounted for in reduced on-site car parking provision. It is important to note that not all community members have access to private vehicles, so it is important to support alternative transit solutions.</p>

Summary of DPTI Proposal	Ref No / DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				Suggest that development proposals should include neighbourhood accessibility ratings as a basis of quantifying appropriate car parking provision.
<i>Minimum carparking</i>	<i>Will the current approach of minimum car-parking rates, with potential for discounted provision, adequately support the desired shift toward more sustainable mobility? Should the Code provide greater opportunity for low or no parking in appropriate circumstances or contemplate maximum parking rates?</i>			<p>Suggest that the Code includes maximum car parking rates, appropriately set, to discourage over-provision of car parking and encourage a shift to alternative transport modes.</p> <p>The Code needs to recognise sustainable transport modes in a quantifiable way to enable the transport mix to be properly provided (electric vehicles, car share, 'Mobility as a Service').</p> <p>Suggest that on-street car parking controls be examined as part of traffic and parking management and can limit traffic churn, support non-private vehicle parking as well as ensure parking availability to support business.</p> <p>The planning system needs to provide integrated mobility options and plan for the people who cannot drive and not rely on private vehicles as the basis for the majority of transport movements.</p> <p>The urban form and planning system should respond to people with varying levels of mobility such as adolescents, aging population, those who choose to live without a vehicle or cannot afford private transport. With emerging technologies such as autonomous self-driving vehicles, the Code should incorporate mobility solutions that look beyond private vehicles.</p>

APPENDIX 1 – CURRENT TRANSPORT PLANNING SYSTEM SUMMARY

The *Planning, Development and Infrastructure Act SA* (2016) introduces a new framework to address transit in a more integrated manner. The table below identifies the limitations under the current system for development to respond to transit solutions outside the development site.

	ON SITE	OFF SITE	OFF SITE		
Mode	Developers Responsibility	Developers Responsibility	Local Government	State Government	Private
	Planning Policy levers		Regulatory and Infrastructure levers		“Market driven”
Pedestrian	Active building design Pedestrian links Design treatments for pedestrian comfort and activation	Greening of verges	Street scape urban design (Lighting, Greening, Seating, Refuges & Water stations)	Transit shelters	
Cycling	End of Trip Facilities Bicycle Storage		Cycleways End of trip facilities Bike lock Shared bicycles	Cycleways	Shared bicycles
Vehicle	Car parking rates (min and max) Car share Electric Vehicle charging points Street access requirements Accessible car parking requirements	Car parking fund – This can be used for sustainable transport such as: cycle, pedestrian and public transport Occasionally agreements to upgrade street infrastructures	Street design influencing speed environment, On-street parking arrangements (paid, time limited and permits). Electric Vehicle Charging points Off-street parking stations Accessible carparking in the vicinity.	Speed environment Regulations for new technologies such as electric vehicles, automated vehicles and drones. Parking Levies / Congestion levies	Off-street parking stations Electric vehicle charging stations (new technology)
Mobility scooter	Storage and access requirements		Charging points in streets		
Driver services					Taxi Uber
Bus	Loading area Coach Parking		Community Bus	Service delivery and infrastructure	Coach services
Tram				Service delivery and infrastructure	
Refuse trucks	Loading areas	Private agreements for refuse collection	Refuse collection		

	ON SITE	OFF SITE	OFF SITE		
Mode	Developers Responsibility	Developers Responsibility	Local Government	State Government	Private
Mobility as a service					Technology to coordinate transport systems.
Drones					Drones for deliveries (emerging and new technology)
Delivery vehicles	Loading and serving policies	Limited use of public land	Loading zones and shared zones	Nil	Logistic centres/ distribution hubs
Non-mode					
Travel behaviour strategies	Management conditions and Site Travel Plans (when required)		Travel Behaviour programs	Travel Behaviour programs	Travel Behaviour programs

APPENDIX 2 – ANALYSIS OF RECENT DEVELOPMENTS

Recent Developments

The following table provides details of 31 recent developments within the City of Adelaide.

Name of Development	Known as address	\$M	Storeys	Apts	Student Beds	Car parks	Bike parks	Use
262 South Terrace	261-265 South Terrace	\$13	15	60		94	79	Residential/Mixed
Common Ground	45-46 Mellor Street	\$10	7	52		0		Managed social housing
60 South	59-60 South Terrace	\$5	6	27		29	27	Residential/Mixed
Hurtle & Co (01) (West)	3-7 Hurtle Square	\$5	7	31		24	30	Residential/Mixed
Bohem	150 Wright Street	\$26	22	223		200		Residential/Mixed
August Towers	316-320 South Terrace	\$19	13	39		60	34	Residential/Mixed
Urbanest	228-231 North Terrace	\$85	21	0	700			Student accommodation
171-175 Gilles Street	171-175 Gilles Street	\$1	3	4		6	6	Residential/Office
ERGO Stage 3	24 Norman Street	\$1.8	5	8		9		Residential
ERGO Stage 2	42-58 Sturt Street	\$22	6	98		108	136	Residential
The Storeys on Surflen	16-20 Surflen Street	\$10.2	7	46	0	40	23	Residential
9-11 Shannon Place (Common Ground)	11 Shannon Place	\$0.8	4	7		0	7	Managed Social Housing
ERGO Stage 1	11-39 Frew Street	\$15	5	73		21	92	Affordable Housing
36-40 Gilbert Street	36-40 Gilbert Street	\$2	4	12		12	16	Residential/Office
20 Norman Street*	20 Norman Street	\$1.6	6	11		0	0	Residential
115-119 Melbourne Street	119 Melbourne Street	\$1.8	3	7		8		Residential
14-16 Gilbert Street	14 Gilbert Street	\$3.6	5	30		8	10	Residential
Citi Fringe	83 South Terrace	\$5	7	23		14	26	Residential/Office
Aria on Gouger	279 Gouger Street	\$27	12	94	0	62		Residential
128 Gilles Street	130 Gilles Street	\$3.5	4	15		16	16	Residential
Vue on King William	411-437 King William Street	\$30	27	210		194	226	Residential/Commercial
Flinders Loft	272 Flinders Street	\$1.8	6	14		14		Residential/Office/Retail
Citi Terrace	111 South Terrace	\$20	11	52	0	74	86	Residential/Office
Central Adelaide	160 Grote Street	\$35	18	280	0	145	134	Residential/Retail
Vision on Morphett	180 Morphett Street	\$35	16	185		95	76	Residential
Zen 2	1-7 Dawkins Place	\$9	8	31		0	21	Residential
Rowlands Apartments/Mandalay	18 Rowlands Place	\$25	16	94			94	Residential
Zen 1	9-17 Dawkins Place	\$6	6	29		0	26	Residential
ART Apartments	242 Flinders Street	\$9	14	51		10	40	Residential
Common Ground	14 Crowther Street	\$0.9	4	7		1	7	Managed social housing
Atira Student Living	231-247 Waymouth Street	\$35	17	0	428	0	128	Student Accommodation

*Provided 11 Scooter Spaces.

The 31 new developments identified were considered between 2010 and 2018. This involved \$464M worth of developments including 1813 apartments, 1128 student dwelling, 1244 car parks and 1112 bicycle parks. Some of the proposals also involved some other land uses however all reviewed were predominantly residential. Notably no off-site transit solutions were provided by the developer (as this was not required by the Development Plan).

The following are some key facts:

Cycling

- 2 in 3 buildings provided separate bicycle storage areas.
- The ratios of bicycle parking to dwellings ranged from 0:98 to 1:1.3

Car Parking

- 3 out of 4 developments provided car parking.
- The ratio of car parking to dwellings ranged from 0:31 to 1:53

Waste and Servicing

- Some of the developments have not designed to allow flexibility to change land uses and provide the necessary waste streams to change over time as land use changes. In addition, some are designed such that servicing by council is not possible. In addition to limiting the flexibility of the building for various land uses, this approach places unnecessary pressure on city streets to accommodate this function thereby increasing the impact on surrounding properties.

Pedestrian Movement

- A significant proportion of street frontages were devoted to car parking and servicing (access and utilities) rather than active frontages residential or commercial. This potentially impacts on-street car parking, street tree locations and pedestrian comfort through cross falls, increased interruptions to continuous pedestrian footpaths.

Case Studies of Pedestrian Experience

59-60 South Terrace

Whilst an active frontage to South Terrace was provided, most of the secondary street frontage is car parking access and servicing. Consolidated access would improve the streetscape and pedestrian experience.



171-175 Gilles Street

Whilst an active frontage to Gilles Street is provided, most of the secondary street frontage and Cromwell Alley is blank facades, car parking access and servicing. Given the materials there is limited ability to easily adapt this floor space to present more transparency to the street.



Sleaved and consolidated access would improve the streetscape and pedestrian experience. In addition, given the large cross-overs this impacts the ability for a shared street approach to be implemented on Cromwell Alley. For example, a shared street approach could activate these streets amenity and use of local communities. In addition, the Cromwell Street frontage could have been improved by more openings to support passive surveillance of the street and further provide opportunities for activate the streetscape.

16-20 Surflen Street

Surflen Street is a narrow street with limited footpath widths. The proportion of the frontage devoted to servicing and access is detrimental the pedestrian experience. Consolidated accesses would have assisted to a limited degree. Whilst these services are needed to the site, it raises the question of the need for shared utilities and servicing as not all sites can achieve it all.

The new legislation could be used to provide area-based solutions for utilities to support better street scape outcomes whilst supporting development.



111 South Terrace

This is a great example ground floor active frontages. The ground building height provides for a range of opportunities for different land uses. Whilst it may not be commercially viable under the current economic conditions of this locality, the ground floor can accommodate a range of land uses including residential. This development also utilises car lifts and stacker car parking. The reduction in ramp use enables this floor space to be adaptable as the needs change.



160 Grote Street

This is a good example of wrap around commercial frontage, active uses on the ground and upper levels. The car parking and servicing is concealed to limit the impact on the street. However, the servicing area is challenging as the turnaround areas are tight for design vehicle.



203 North Terrace

The approved development proposal includes a new vehicle access from the North Terrace boulevard. The number of car parks provided will impact the street as they access and queue on the pedestrian boulevard. Given the impact of the prominent street, it raises the issue of transport policies impacting the public domain. It raises the question of the suitability of providing ancillary car parking to sites in all locations.



RESPONSE TO NATURAL RESOURCES & ENVIRONMENT

Key comments on the 'Natural Resources & Environment Discussion Paper' from the City of Adelaide are summarised below by theme. Detailed comments are included in the attached Table 1.1 – City of Adelaide Response to Natural Resources & Environment Discussion Paper.

THEME 1: Sustainable and Liveable Urban Environments

1.1 Green Infrastructure and Water Sensitive Urban Design

- a) The proposal to strengthen and encourage green infrastructure and water sensitive urban design is supported, noting that this transition should occur comprehensively as soon as possible. It is however noted that the Water Sensitive SA report referred to in the Discussion Paper was not made available at the time this response was prepared.
- b) Practical coordination between catchment-based goals/targets and planning policy could create greater certainty in relation to the most appropriate level of investment in green infrastructure and WSUD design techniques for each development.
- c) Green Infrastructure is a key tool to create comfortable micro-climates in the City of Adelaide and contribute to its ongoing liveability.
- d) In a highly urbanised environment such as the City of Adelaide, it should be noted that tall buildings create drafts and wind which require careful management during the building design and development assessment stage. This is of particular importance in locations where there are taller, more closely sited buildings. A spatial response to this could be contemplated, in addition to “deemed to satisfy” provisions to ensure appropriate levels of safety and microclimate in the vicinity of such buildings.

1.2 Energy Efficient Design

- a) Transition and reinforcement of energy efficient design policies is supported; however, the proposed approach has opportunity to be strengthened.
- b) The SAPPL “Energy efficiency” policies, whilst succinct, potentially do not provide sufficient policy guidance to ensure the required outcomes in a timeframe that will be useful to mitigate climate change impacts adequately.
- c) Close consideration should be given to how to utilise policy mechanisms to achieve carbon-neutral and climate-ready development, noting that what is built now will be here in 50-80 years when the climate will have worsened, based on current projections.
- d) Building “climate neutral” now can contribute to reducing the trajectory of the current projections and reduce the likely health and economic risks for our community.

1.3 Waste Management

- a) Transition of effective policy to ensure quality and cost-effective waste management is supported. The Planning and Design Code policy should reference the “South Australian Better Practice Guide Waste Management for Residential and Mixed Use Developments”, which are consistent with the guidelines created by the City of Adelaide, and would be suitable for transition within the proposed timeframes.

THEME 2: Water Security and Quality

City of Adelaide reinforces and supports the need to protect the Mount Lofty Ranges Watershed and River Murray to enable security and quality of water for the benefit of water users, including the City of Adelaide.

THEME 3: Biodiversity

This approach is supported in principle. Regard should be had to the recently developed City of Adelaide Integrated Biodiversity Management Plan, including its spatial application where relevant.

THEME 4: Coastal Environments

City of Adelaide's contribution to Coastal Environment outcomes is addressed via effective use of policies in Themes 1, 2, 3, 5 and 6.

THEME 5: Natural Hazards

The proposed transition approach provides an opportunity to update planning policies that will apply in the City of Adelaide with respect to flood mitigation, to achieve improved outcomes and to achieve consistency with whole of catchment approaches in adjoining local government areas, for example River Torrens/Karrawirra Parri Linear Park.

THEME 6: Environment Protection and Public Health

6.1 Site Contamination


Differences in the level of Site Contamination policy detail exists between the Adelaide (City) Development Plan and the SAPPL. City of Adelaide would need assurance the same or greater level of protection of environment and public health will be enabled via the SAPPL policies before agreeing to the proposed approach, particularly in light of the trend towards reduced referrals in the new system.

6.2 Interface (including Noise and Air Emissions)

Adelaide (City) Development Plan contains detailed policies on Noise Emissions which should be considered and incorporated in the Planning and Design Code.

Table 1.1 – City of Adelaide Response to Natural Resources and Environment Discussion Paper

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
THEME 1: Sustainable and Liveable Urban Environments				
1.1 Green Infrastructure and Water Sensitive Urban Design	1A Councils that have converted to the SAPPL have introduced provisions that support the inclusion of WSUD principles in urban areas, including stormwater management. It is important to review and transition these to the Code.	Review, refine and transition existing SAPPL WSUD policy where appropriate.	Transition ready ✓	<p>Supported in principle.</p> <p>It is noted that the Water Sensitive SA report referred to in the Natural Resource and Environment Discussion Paper was not made available at the time this response was prepared. City of Adelaide reserves the right to review that paper and provide additional comment.</p> <p>Existing policy in the Capital City Zone which provides incentives for green walls, green roofs and associated infrastructure in the case of “over-height” development of the Adelaide (City) Development Plan will need to be reviewed and amended if needed. WSUD aspects of a development should be standard practice moving forward. Meeting these requirements would contribute to gaining approval for a development. Incentives would therefore not be necessary.</p> <p>Practical coordination between local catchment/Stormwater Management Plan goals/targets and the policy will create certainty and manage an appropriate level of investment in WSUD design techniques for each development which is location and catchment specific.</p> <p>Targets could assist in ensuring appropriate level of investment is required at the most appropriate scale and in the correct location (site, neighbourhood, public realm etc.), create greater certainty for developers and minimise unnecessary overdesign of green infrastructure and water sensitive urban design elements of a development proposal, whilst ensuring that best-practice solutions are integrated into development design. Utilisation of on-line assessment tools developed by Water Sensitive SA will complement policy changes.</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>Enable P&DC reference to the Adelaide Design Manual to enable effective integration with City of Adelaide public realm goals.</p> <p>It is recognised that ongoing management and maintenance is responsibility of property owner- However, potential might exist to coordinate between e-planning and Council's asset management systems to assist integration and monitoring of ongoing effectiveness and compliance.</p>
	<p>1B</p> <p>There is increasing recognition of the value of GI in creating cooler, more liveable and economically viable neighbourhoods.</p> <p>To this end, GI policies were introduced in 2017 to some higher density mixed use zones in Development Plans in metropolitan Adelaide. There is an opportunity to transition these over to the Code, where appropriate.</p>	<p>Review and transition existing SAPPL WSUD policy where appropriate.</p>	<p>Transition ready</p> 	<p>Supported in-principle, however suggest review of existing provisions is needed to understand their effectiveness before transitioning over and expanding use to other locations.</p> <p>Green Infrastructure is a key tool to create comfortable micro-climates in the City of Adelaide and contribute to its ongoing liveability.</p> <p>In a highly urbanised environment such as the City of Adelaide, it should be noted that tall buildings create drafts and wind which require careful management during the building design and development assessment stage. This is of particular importance in locations where there are taller, more closely sited buildings. A spatial response to this could be contemplated, in addition to "deemed to satisfy" provisions to ensure appropriate levels of safety and microclimate in the vicinity of such buildings.</p> <p>Also refer to all comments provided for 1A.</p>
	<p>1C</p> <p>There is inconsistent policy across some Development Plans to manage stormwater volume and, in some cases, WSUD policy is applied inconsistently. Currently some WSUD</p>	<p>Develop new 'Deemed to Satisfy' and 'performance outcomes' policy for WSUD and GI.</p>	<p>Reform (Gen 1)</p>	<p>Suggest this is achievable in a much shorter timeframe and should move to "transition ready".</p> <p>Refer to comments in 1A above.</p> <p>Support the opportunity to utilise Water Sensitive SA assessment tools if these are made available.</p>


Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	policy is applicable only to master planned/large scale developments and not to small scale in-fill, which is an increasing percentage of new development. Policy is therefore needed that is scalable to cater for all development types.			Policies that enable appropriate WSUD design for various scales and types of development, and with regard to local catchment targets and priorities are encouraged.
	1D In infill areas, where there is limited private land, there may be an opportunity to consider off-site GI and WSUD solutions where appropriate. This may provide an efficient and affordable model for delivering urban green cover and tree canopy targets in line with the 30-Year Plan for Greater Adelaide and state WSUD objectives.	Explore policy that connects the ability of road reserves to accommodate tree planting or other suitable GI in lieu of provision on private allotments.	Reform (Gen 2 and beyond)	<p>Highly built-up areas in the City of Adelaide may have the opportunity to utilise higher-end WSUD techniques on-site due to land economics.</p> <p>This may create the opportunity for creative use of existing (and future) WSUD and GI engineering solutions without necessarily relying on off-site land, via “performance assessed” pathways in the Planning and Design Code.</p> <p>The proposed exploration of policy that connects the ability of road reserves to accommodate tree planting or other suitable GI in lieu of provision of private allotments should be undertaken cautiously and be clearly guided by Council-endorsed open space, urban design, green infrastructure and WSUD goals for the City of Adelaide.</p>
	<i>Should existing WSUD and GI policies also apply to regional areas and for all development scales and types?</i>			<p>Water Sensitive Urban Design and Green Infrastructure policies could be connected to addressing localised issues, such as achieving the approved goals of endorsed Stormwater Management Plans, and local or regional Resilience Strategies.</p> <p>Reducing the “Urban Heat Island” effect and creating suitable local micro-climates is important.</p> <p>For the City of Adelaide, heating and cooling are key considerations, however in regional areas it is recognised that dust</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>control and other environmental factors may also be a key consideration for creating and maintaining liveable environments that WSUD and GI policies could help to address.</p> <p>If WSUD and GI policy is set to incorporate regard to local conditions and targets, then development scale will have already been considered in relation to design solutions and requirements for any given development site. In addition, Water Sensitive SA on-line DA assessment tools, when available, could be utilised for lower-scale development.</p>
1.2 Energy Efficient Design	<p>1E</p> <p>These policies are relatively sound and are ready for transition.</p>	<p>Review existing SAPPL energy efficiency policies and undertake consolidation and minor refinement where necessary.</p>	<p>Transition ready</p> <p>✓</p>	<p>Energy efficient design is supported, however the proposed approach is insufficient. The SAPPL “Energy efficiency” policies, whilst succinct, potentially do not provide sufficient policy guidance to ensure the required outcomes in a timeframe that will be useful to mitigating climate change impacts adequately.</p> <p>Close consideration should be given to how to utilise policy mechanisms to achieve carbon-neutral and “future climate-ready” development, noting that what we build now will be here in 50-80 years when the climate will have worsened, based on current projections.</p> <p>Building “climate neutral” now can contribute to reducing the trajectory of the current projections and reduce the likely health and economic risks for our community.</p> <p>The Draft Planning and Design Code should draw from the current Adelaide (City) Development Plan which contains effective policy which has resulted in energy efficient design and construction in the City. The P&DC’s “Deemed-to-satisfy” approach provides an opportunity to improve and strengthen the implementation of these policies.</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p>More emphasis needs to be placed on the importance of appropriately orientating buildings and maximising the use of passive solar design techniques, which are neither new nor costly.</p> <p>There is also an opportunity to give greater recognition in the Planning and Design Code to the value and role of embodied energy within existing buildings with potential for reuse.</p>
	<p>1F</p> <p>There is an opportunity to better apply energy efficiency policies to non-residential buildings such as consulting rooms, offices, educational establishments, retail and community, where there is a high level of human use.</p>	<p>Review energy efficient policies relating to non-residential building types.</p>	<p>Reform (Gen 1)</p>	<p>Supported in-principle. Agree that energy efficiency policies should be applied to all development, which is consistent with the current Adelaide (City) Development Plan.</p> <p>Cost-effective opportunities to enforce compliance with Development Approvals could be considered. Ensure these approaches complement and reinforce opportunities currently being pursued via National Construction Code.</p> <p>Query whether “high level of human use” should be the determining factor. For example, data-centres have a narrow temperature tolerance and require air-conditioning.</p>
	<p>1G</p> <p>There is a need to give better consideration to sustainable design outcomes including overshadowing of solar panels and solar hot water services. On the neighbourhood scale policies could encourage consideration of community or shared energy-saving facilities.</p>	<p>Review and draft new policies to achieve better sustainable design outcomes and ensure the appropriate application of sustainable design policy to all relevant development/land use types.</p>	<p>Reform (Gen 1)</p>	<p>Supported in principle. Consideration should be given to why existing sustainable design policies are not given a higher priority during development assessment.</p> <p>More guidance needs to be provided in the policy for different overshadowing scenarios, for example to assist with assessment of a taller proposed building blocking some of the sunlight to solar panels.</p> <p>Consideration needs to be given to the thermal impact of buildings on the temperature of the City, as each building has a cumulative effect, and consideration of existing/future ratings systems/heat mapping might assist in monitoring the effectiveness of technologies such as insulation etc.</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<i>What role should the planning system play regarding preservation of sunlight to solar panels from adjacent development?</i>			<p>Spatial application of land use zoning would benefit from taking light, solar access and solar panel and/or other renewable energy opportunities into consideration during any proposed rezonings. In a high-density area with tall buildings, individual solar panels on roofs may not be the most effective energy generation approach.</p> <p>Solar access/access to natural light for development, particularly residential development, is a key design consideration, irrespective of the presence or potential for solar panels. Adelaide (City) Development Plan's existing Council-wide provisions reinforce this.</p> <p>Optimal renewable energy generation/storage mix should also be considered depending on the scale and energy usage of development. Different approaches might be available and potentially considered at the site, precinct or regional scale. For locations such as the City where tall buildings, or medium height buildings with a large physical footprint, are anticipated, other renewable energy options may be more appropriate to meet the energy needs of the proposed development.</p> <p>The planning system should aim to preserve sunlight to solar panels where appropriate, in addition to existing best-practice of ensuring appropriate natural light and solar access is maintained.</p> <p>If needed one approach could be the insertion of "shade" to the existing list of items in PDC1 of the SAPPL "Interface Between Land Uses" module.</p>
	<i>Should the Code introduce incentives for development that can incorporate passive solar design (siting) techniques, green infrastructure and WSUD?</i>			<p>These aspects of a development should be standard practice moving forward. Meeting these requirements would contribute to gaining approval for a development. Incentives would therefore not be necessary.</p>

	<p><i>How can planning policy contribute to reduced carbon emissions from the built environment sector?</i></p>		<p>The recent Intergovernmental Panel on Climate Change (IPCC) special report “Global Warming of 1.5°C” has indicated that global warming is likely to reach 1.5°C between 2030 and 2052 if it continues to increase at the current rate. It is therefore important to accelerate planning policy responses to contribute to achieving net emission reduction pathways to limit global warming to 1.5°C with no or limited overshoot.</p> <p>Planning policy can be written to assist limiting global warming to below 1.5°C by requiring land use, spatial planning and built form to move towards zero-carbon outcomes, including design and construction via siting and design of structures, including consideration of building materials. Planning policy can complement and reinforce the efforts to reduce carbon emissions which are being made via the National Construction Code.</p> <p>Additional training and education for planners, builders and the development industry may assist comprehensive and swift action to reduce greenhouse emissions.</p> <p>Use of passive solar design principles, inclusion and specification of low carbon building materials and long-term energy efficiency during the life-cycle of the building should all be required up-front. Architects already have training in how to achieve this and will be able to assist their clients to understand sustainability requirements, and some building designers may need to up-skill to demonstrate to the development sector what can be achieved. This requirement will continue to drive new industries and business and investment opportunities in South Australia.</p> <p>Planning policy can also continue to maximise opportunities for public transport to and from the City, and encourage housing, recreation and employment opportunities etc. in this central location to minimise fossil fuel use.</p> <p>Transitioning existing, effective design policies which reinforce these outcomes, many of which are already embedded within Adelaide (City) Development Plan, including Council-wide policy relating to “Built Form and Townscape” (pages 60-71), as just one example.</p>
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Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
1.3 Waste Management	1H These policies are relatively sound and are ready for transition.	Review existing SAPPL policies and consider minor refinement where necessary.	Transition ready 	<p>As density increases in the City it is important that performance guidelines are in place to address the location of refuse storage areas and the ease of collecting refuse from sites. It is the City of Adelaide experience that successful outcomes result from upfront consideration in the design process.</p> <p>The Planning and Design Code policy should reference the “South Australia Better Practice Guide Waste Management for Residential and Mixed Use Developments”, which are consistent with the guidelines created by the City of Adelaide.</p> <p>The following Design Objectives suitable for waste and recycling management in high density development draw from City of Adelaide experience – there is opportunity for these to be reinforced in P&DC policy:</p> <p>Environmental Sustainability</p> <ul style="list-style-type: none"> • resource recovery is maximised and waste to landfill is minimised • occupant waste and recycling service requirements are met satisfactorily • statutory obligations of any predicted waste streams are met <p>Effective Waste Resources Management</p> <ul style="list-style-type: none"> • occupants and building managers have functional and convenient separation and disposal of waste and recycling streams (including universal access) • trip generation and pedestrian travel distances to the point of disposal are minimised • flexibility in the system’s capacity allows for changes in land use and/or generation rates • storage areas are convenient to primary pedestrian movements (main walking routes through the area)

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<ul style="list-style-type: none"> collection zones are designed so that waste can be removed from the site safely and conveniently <p>Clean and Healthy Living Environments</p> <ul style="list-style-type: none"> negative impacts on amenity for residents, neighbours and the public are minimised (visual, noise, traffic, odour, litter and illegal dumping potential) waste disposal and collection is hygienic and safe <p>Affordability</p> <ul style="list-style-type: none"> up-front investment during construction is optimised ongoing waste management is cost effective for residents and tenants.
	<p>1L</p> <p>Some buildings (particularly high-rise) have inadequate space to store and/or sort the refuse and recycling generated by them. This needs to be considered as part of the development from the beginning. Policy also needs to provide enough flexibility to respond to new technologies (for example smaller/more adaptable waste relocation vehicles).</p>	<p>Review existing SAPPL policies, consider best practice council policies that focus on dealing with waste in a higher density environment and identify opportunities for improvement.</p>	<p>Reform (Gen 1)</p>	<p>As density increases in the City it is important that performance guidelines are in place to address the location of refuse storage areas and the ease of collecting refuse from sites.</p> <p>It is recommended that the Planning and Design Code policy references “South Australia Better Practice Guide Waste Management for Residential and Mixed Use Developments”, which are consistent with the guidelines created by the City of Adelaide.</p>
	<p><i>How do we plan for current waste removal practices and technologies and provide flexibility for innovative future solutions?</i></p>			<p>See comments from 1H above.</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
THEME 2: Water Security and Quality				
2.1 Mount Lofty Ranges Watershed Protection Area	<p>2A</p> <p>From consultation to date with relevant councils and agencies, the following issues have been identified:</p> <ul style="list-style-type: none"> • Inconsistencies with referrals resulting from changes to non-complying forms of development across planning authorities • Emerging land uses with similar impacts not being subject to the same requirements (e.g. breweries and cideries versus wineries) • The lack of policy guidance for other emerging land uses, including value-adding activities • Some known high impact land uses are currently unrestricted whilst other low impact uses are restricted. 	<p>Develop an Overlay across the MLRWPA based on the recent Mount Barker Watershed Overlay and apply consistently across all nine councils. This will include, where relevant:</p> <ul style="list-style-type: none"> • Adopting relevant policy amendments derived from the EPA's 'Hierarchy of acceptable effects' to water run-off in the MLRWPA • Applying a spatial overlay to all affected areas. 	Reform (Gen 1)	City of Adelaide reinforces and supports the need to protect the Mount Lofty Ranges Watershed to enable security and quality of water for the benefit of water users, including the City of Adelaide.
2.2 Other Water Protection Areas	<p>2B</p> <p>Opportunity exists to consider the learnings from the recent Rural City of Murray Bridge Regional Integrated Water</p>	Develop an Overlay to create consistent policy for the other water protection (Development Plan)	Reform (Gen 1)	City of Adelaide reinforces and supports the need to protect water protection areas outside of the MLRWPA (such as River Murray) to enable security and quality of water for the benefit of water users, including the City of Adelaide.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	Management DPA in the development of a future overlay for all Prescribed Water Resources Areas under the Natural Resources Management Act 2004. This would help ensure the sustainable use of non-prescribed water resources.	zoned areas located outside the MLRWPA.		
	2C Knowledge of the quantity and quality of non-prescribed water resources is limited, hindering their effective management and potential development. Ongoing research and monitoring is being undertaken by DEW in order to better understand the capacity of the resources and the potential impact of increased demand and changes in land use and climate.	Consider extending the spatial application of this Overlay to other water protection areas that are currently not captured in existing Development Plans.	Reform (Gen 2 and beyond)	Additional information on the nature and scope of this proposal is required to enable useful comment.
	<i>Should dams be assessed as development in the planning system?</i>			In the context of the City of Adelaide, yes.
2.3 River Murray	2D A regional approach to deal with policy inconsistencies between River Murray council areas is needed. For example, a consistent	Review relevant SAPPL and existing Development Plan Zones to determine new Code Zone(s) and review the following policies:	Reform (Gen 1)	No comment.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<p>approach to river structures and moorings on the river.</p> <p>There is a need to retain and consolidate key policies and zones relating to the protection of important natural environments, water bodies, biodiversity and conservation areas.</p>	<ul style="list-style-type: none"> • Envisaged land uses • Moorings and structures • Shacks and waste water management • General environmental protection • Excavation and filling in any future marina zoning • Farming, tourist accommodation and workers accommodation • Consistent enclosed ground level area requirements 		
	<p>2E</p> <p>The intensification of land use in close proximity to the river, wetlands and conservation areas through the creation of additional allotments needs to be addressed.</p>	Review existing SAPPL and Development Plan land division policies in areas adjacent to the river.	Reform (Gen 2 and beyond)	No comment.
	<p>2F There is potential to introduce a River Murray Water Protection Area to facilitate a coordinated regional approach to the implementation of planning policies.</p>	Develop an overlay which aligns with the River Murray Water Protection Area.	Reform (Gen 2 and beyond)	No comment.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<ul style="list-style-type: none"> <i>Should we instead use the 1956 flood data as an indicator of risk in the future?</i> <i>Should sheds be made an exemption from the requirement to refer notice under the River Murray Act 2003?</i> 			No comment.
THEME 3: Biodiversity				
	<p>3A</p> <p>The transition to the Code creates an opportunity to refine policies in order to minimise different interpretations.</p>	<p>Review SAPPL policies in Coastal Areas, Infrastructure, Land Division (Design and Layout), Metropolitan Open Space System, Natural Resources, Open Space and Recreation and Siting and Visibility general modules and identify opportunities for refinement.</p>	<p>Transition ready</p> 	<p>There is an opportunity to explicitly refer to known areas of biodiversity which require protection in the City of Adelaide. See Council-endorsed Integrated Biodiversity Management Plan.</p> <p>The Drafting of the Park Lands Zone and any other relevant Zones or overlay proposed in the City of Adelaide will need to identify opportunities to assist achieving regional and/or local biodiversity targets. To what extent will the new Code enable referencing of specific strategies? At a minimum, key biodiversity areas that can be spatially mapped should be included in the P&DC for the City of Adelaide.</p> <p>Additional considerations:</p> <ul style="list-style-type: none"> Consideration could also be given in P&DC policy to regional biodiversity targets which exist in NRM Plans (and in the future, plans and targets which might be established under the proposed <i>Landscape SA Act</i>). P&DC policies could potentially be linked to current information about the condition of biodiversity, and spatially relevant, to enable incremental piecing together of corridors/pathways of vegetation/habitat. Be as specific as possible about what is needed, so that development can incorporate these requirements and be enforceable.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	3B There is an opportunity to reduce duplication of policy (currently in separate zones and general modules)	Consider one conservation zone, with spatial overlays (such as coast) that apply where required to trigger referrals and reflect state interests.	Reform (Gen 1)	This approach should be pursued only if it is the most effective way to achieve local, regional and state biodiversity goals.
	3C There can be an issue at the interface between different land uses. For example, planting olives or vineyards in close proximity to the edge of a protected area. The transition to the Code presents an opportunity to incorporate policy that helps manage the interface between protected areas and adjoining land uses.	Strengthen policies for the interface between protected areas and adjoining land uses (from existing Natural Resources general module policy).	Reform (Gen 1)	Supported.
	3D The impact of adjacent land uses on biodiversity can be substantial. The development of the Code allows adjacent impacts to be considered at a consistent and appropriate level.	Ensure appropriate spatial application of policy (to land adjacent to nature protection areas).	Reform (Gen 1)	Supported. Refer to comment in 3A which references the City of Adelaide "Integrated Biodiversity Management Plan". More opportunities could be embedded in policy to create areas of biodiversity on top of buildings, particularly in the City.
	3E It is important to delineate and maintain areas with	Develop policies and maps of the environmental and character values	Reform (Gen 2 and beyond)	Supported, noting that existing mapping could be drawn upon if this action is moved forward.


Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	significant environmental values; protect landscape health; preserve biodiversity; and improve development certainty and transparency. There is an opportunity to improve the associated mapping and incorporate it into future generations of the Code.	associated with specific nature protection and complementary developed areas.		
	<i>Can the Code protect biodiversity in areas not identified as native vegetation and in modified landscapes with biodiversity values?</i>			The Code should try to protect biodiversity more effectively than the current system, which is incrementally losing biodiversity across the Greater Metropolitan area which the City of Adelaide is physically connected with. Contemplate use of conditions of approval.
	<i>Can planning policy assess the cumulative impact of development on biodiversity?</i>			If clear targets are set, the e-planning system should be able to track and collate site by site removal and/or increases/improvements to biodiversity, depending on how it is set up.
	<i>Can planning policy play a role in protecting and encouraging backyard biodiversity?</i>			If clear targets are set that are measurable and spatially applied and tracked. Feedback could also be given to communities which draws from this data, to give sort-of real time feedback to improvements (or otherwise) in back-yard biodiversity.
	<i>Do we need a policy to protect and encourage development of roadside vegetation?</i>			Supported. Approach may vary depending on location and scale of roadside vegetation (e.g. city/rural etc.). In the City of Adelaide context, we are focussed on new plantings in highly impervious locations. Consideration to the role these new biodiversity corridors can play to connect pockets of existing biodiversity is important.
THEME 4: Coastal Environments				
	4A	Review and consolidate existing	Transition ready	No comment.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	The transition to the Code creates an opportunity to refine policies in order to minimise different interpretations.	variations to Coastal Areas, Coastal conservation, Coastal Open Space and Coastal Settlement SAPPL general and zone modules and ensure appropriate and consistent site and floor level requirements.	✓	
	4B There is an overlap between the 'High Water Mark' and 'Low Water Mark' in Development Plans and there is an opportunity to deal with this as part of the transition to the Code.	Resolve the 'High Water Mark' and 'Low Water Mark' overlap between Land Not Within A Council Area (Coastal Waters) and other Development Plans.	Transition ready ✓	No comment.
	4C There is an opportunity to make coastal policies more consistent by consolidating existing policies. This could be achieved by developing an overlay(s). Currently investigations are underway about whether to have one or more overlays. Using an overlay would also provide the necessary mechanism to trigger relevant referrals.	Develop a Coastal Areas Overlay (or two: one for metropolitan and one for non-metropolitan areas).	Reform (Gen 1)	No comment.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<p>4D</p> <p>The increasing impacts of climate change are reinforcing the need for policies to better protect, preserve and provide space for migration of coastal features and habitats adapting to sea level rise (e.g. the migration of dune systems and mangroves).</p>	<p>Ensure policy requires adequate consideration of climate change risks, including provision of space for migration of coastal features such as beaches, dunes and mangroves where appropriate.</p>	<p>Reform (Gen 1)</p>	<p>No detailed comment on this topic, noting that City of Adelaide's contribution to Coastal Environment outcomes is addressed via effective use of policies in Themes 1, 2, 3, 5 and 6.</p> <p>It is assumed that the policy response to Theme 3 – Biodiversity will incorporate adaptation and migration policies which would apply to City of Adelaide as required.</p>
	<p>4E</p> <p>Existing policy needs to have more clarity about what land-use activities are envisioned for these areas.</p>	<p>Resolve policy to apply to Land Not Within A Council Area (Coastal Waters), including providing clearer uses (such as aquaculture, tourism and recreation).</p>	<p>Reform (Gen 1)</p>	<p>No comment.</p>
	<p>4F</p> <p>With rising sea levels, the risk of inundation increases. Therefore the spatial application of where this risk applies needs reviewing and updating.</p>	<p>Ensure policy requires soakage trenches associated with waste water disposal to be located appropriately in relation to potential inundation.</p>	<p>Reform (Gen 1)</p>	<p>No comment.</p>
	<p>4G</p> <p>There is potential to improve aquaculture policies, in particular in the area of waste water, buffer</p>	<p>Ensure appropriate policy for waste water, buffer widths and on-shore facilities in aquaculture zones.</p>	<p>Reform (Gen 2 and beyond)</p>	<p>No comment.</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	widths and on-shore support facilities.			
	4H Climate change is likely to create increased hazard levels and therefore it will be important to ensure that mapping is regularly reviewed and updated.	Work with relevant parties to review and update hazard mapping in coastal areas.	Reform (Gen 2 and beyond)	No detailed comment on this topic, noting that City of Adelaide's contribution to Coastal Environment outcomes is addressed via effective use of policies in Themes 1, 2, 3, 5 and 6.
	<i>What level of development (including accommodation) is appropriate for a Coastal Conservation Zone?</i> <i>Does current planning policy adequately address the risk of new development from climate change impacts (coastal retreat, sea level rise and storm surges, etc.) for at-risk coastal settlements?</i>			No comment.
THEME 5: Natural Hazards				
	5A Hazard policy needs to be reviewed, consolidated and best practice policy applied.	Consolidate and transition relevant SAPPL Hazards, Coastal Areas and Land Division general modules policy to the code.	Transition ready ✓	The SAPPL "Hazards" policies contain provisions which would strengthen Adelaide (City) current policies. Similarly, there is potential to transition long-standing SAPPL policies to the Adelaide (City) Development Plan's Park Lands zone, such as those in the "Open Space Zone" which relate to public and private land within the Metropolitan Open Space System including the River Torrens/Karrawirra Parri Linear Park, noting its role as "A river system which provides for the maintenance of stormwater capacity and flood mitigation measures for adjoining areas".
	5B Flooding mapping needs to be consistent across and within different jurisdictions	Review and refine the mapping of hazards in current development plans	Reform (Gen 1)	Adelaide (City) Development does not include flood mapping or a flooding overlay. It would need to be clarified who is undertaking and verifying this mapping for the City of Adelaide, and who would have ongoing responsibility for such mapping.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	<p>(including the mapping methodology) and be linked with the new Code. Consistency of terminology for flood-related policy is also needed. Acid sulphate soil areas could be applied as an overlay (using mapped areas in existing Development Plans), subject to consistency of data. Bushfire mapping, methodology and possibly policy need updating (with reference to recent changes to Victorian and New South Wales policy). Introducing overlays will provide a mechanism to ensure hazard mapping is regularly kept up to date.</p>	<p>and transition into spatial layers with associated overlays, including:</p> <ul style="list-style-type: none"> • Mapped flood areas as a new Flood Risk Overlay • A Bushfire Risk Overlay • Other hazards currently mapped such as coastal hazards and acid sulphate soils. 		
	<p>5C</p> <p>The Code provides an opportunity to review current hazard policy and update it with best practices where appropriate, including nuanced policy that reflects the level of risk.</p>	<p>Update flooding policy in the Hazards general module to reflect best practice policy where appropriate.</p>	<p>Reform (Gen 1)</p>	<p>See previous comment.</p>
	<p>5D</p> <p>There is an opportunity to improve flood mapping by: updating the mapping of all</p>	<p>Review the flood mapping data (not currently mapped in Development Plans) and update the Flood Risk Overlay</p>	<p>Reform (Gen 2 and beyond)</p>	<p>See previous comment.</p>

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	flood-prone areas using a consistent methodology. Exploring the opportunity to create flood risk categories associated with overlays that take into account flood function as well as volume and depth.			
	<i>How can we better integrate council-owned flood data with the new Code and achieve consistency?</i> <i>What climate change projections should be used?</i> <i>What time-frame and emission scenarios?</i> <i>Should flood risk categories be based on physical (depth and velocity) and function and isolation risk factors?</i>			City of Adelaide has previously been involved with neighbouring Councils in various flood studies, including Brown Hill Keswick Creek (2016), First to Fifth Creeks (2007), and River Torrens Flood Mitigation Study (2005). City of Adelaide currently does not have a Stormwater Management Plan for the City, however work has commenced on developing a Stormwater Catchment Plan. There is potential to explore how to integrate the outcomes of that study with the new Planning and Design Code.
THEME 6: Environment Protection and Public Health				
6.1 Site contamination	6A The transition to the Code creates an opportunity to refine policies in order to minimise different interpretations.	Review and transition relevant SAPPL site contamination policies to the Code.	Transition ready 	There is considerable difference in the level of policy detail between the Adelaide (City) Development Plan and the SAPPL. City of Adelaide would need assurance the same or greater level of protection of environment and public health will be enabled via the SAPPL policies before agreeing to this approach, particularly in light of the trend towards reduced referrals in the new system. SAPPL policy current states: “ <i>Site Contamination</i> <i>30 Development, including land division, should not occur where site contamination has occurred unless the site has been assessed</i> ”

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
				<p><i>and remediated as necessary to ensure that it is suitable and safe for the proposed use."</i></p> <p>Current Adelaide (City) Development Plan policy states:</p> <p><i>"Objective 29: A safe and healthy living and working environment.</i> <i>PDC 105: Where there is evidence of or reasonable suspicion that land, buildings and/or water, including underground water, may have been contaminated, or there is evidence of past potentially contaminating activity/ies, development should only occur where it is demonstrated that the land, buildings and/or water can be made suitable for its intended use prior to commencement of that use.</i></p> <p><i>Note: Information of the suitability of land for the proposed land use should be provided as part of the development application and should include:</i></p> <ul style="list-style-type: none"> <i>(a) The provision of a report of the land use history and condition of the site;</i> <i>(b) Where the report reveals that contamination is suspected or identified, a detailed site assessment report that determines whether site contamination poses an actual or potential risk to human health and the environment, either on or off the site, of sufficient magnitude to warrant remediation appropriate to the purposed land use;</i> <i>(c) Where remediation is warranted, a remediation and/or management strategy prepared in consultation with an independent Environmental Auditor, Contaminated Land, endorsed by the EPA;</i> <i>(d) A site audit report, prepared by an independent Environmental Auditor, the site is suitable for the intended uses(s), or for certain stated uses(s) and also states any conditions pertaining to the use(s)."</i>
	6B There is currently a lack of policies for planners to use in assessment when no referral is triggered (e.g. it is	Review and develop appropriate policy for planners to assess site contamination	Reform (Gen 2 and beyond)	See comment above – recommend retaining City of Adelaide approach to Site Contamination policy until such time as adequate triggers are in place within the Planning and Design Code.

Summary of DPTI Proposal	Ref No /DPTI Key opportunities and challenges	Proposed DPTI response	DPTI Proposed timing	City of Adelaide Comment
	known that there are a number of undiscovered contaminated sites so there is a need to have policies that trigger property investigations when required.	where no referral is required.		
<i>6.2 Interface including noise and air emissions</i>	6C There is an opportunity to review policies relating to interface, particularly in light of recent policy amendments and movement towards more mixed-use zoning, eg. Residential areas alongside industry or commercial uses.	Review and refine the SAPPL interface Module as required.	Transition ready ✓	<p>Adelaide (City) Development Plan contains detailed policies on Noise Emissions which should be considered and incorporated in the Planning and Design Code.</p> <p>For example, appropriate vertical stacking of uses in a mixed-use building could be considered e.g. restaurant at ground, commercial on upper with residential above. Also consider appropriate apartment stacking of rooms of similar use in residential apartments e.g. bedrooms over bedrooms, living rooms over living rooms etc.</p> <p>There needs to be onus on noise-sensitive uses to demonstrate they will not impact on the viability of existing non-residential uses such as existing bars, restaurants etc.</p>
	<i>Should cumulative noise impact assessments be undertaken as part of the development assessment process?</i>	-	-	This may need to be considered in relation to noise-sensitive land uses and/or at the boundary of zones which encourage noise-sensitive land uses and zones which encourage potentially noise-generating land uses.
	<i>How can policy effectively address the interface between land uses in zones promoting mixed land uses? For example, a coffee roaster adjacent to a residential development in an urban corridor.</i>			Consideration of how the policies are spatially applied will be critical in this regard, as will land use definitions. What would be a trigger for refusal in the new system? City of Adelaide noise provisions are an effective example of putting the onus on both the noise generator and receiver to contribute to the solution.

Attachment E

South Australian Arts Plan Submission

ITEM 8.2 09/04/2019
Council

2019/00558
Public

Program Contact:
Sean McNamara, AD Community
& Culture [DELETED]

Approving Officer:
Clare Mockler, Director
Community

EXECUTIVE SUMMARY:

The Government of South Australia (the Government) is seeking contributions to assist in the development of South Australia's 2019-2024 Arts Plan.

This report seeks Council endorsement for the City of Adelaide submission to the consultation.

RECOMMENDATION:

THAT COUNCIL

1. Endorses the submission prepared by the Administration in response to the Government's consultation on the development of South Australia's 2019-2024 Arts Plan as shown in Attachment A to Item 8.2 on the Agenda for the meeting of Council held on 9 April 2019.
 2. Notes that feedback on the Government's consultation must be received by the 19 April 2019.
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IMPLICATIONS AND FINANCIALS:

City of Adelaide 2016-2020 Strategic Plan	Strategic Alignment – Creative Strategic Alignment – Smart Strategic Alignment – Liveable [Link 1 - City of Adelaide 2016-2020 Strategic Plan Alignment]
Policy	The relevant policies of Council that relate to the discussion paper include: Cultural Strategy 2017-2023 Live Music Action Plan 2017-2020 Public Art Action Plan 2014-2019 Adelaide Park Lands Management Strategy 2015-25 Stretch Reconciliation Action Plan 2018-21 Wellbeing Roadmap Visitor Economy Action Plan 2018-20 Adelaide. Designed for Life [Link 2 - Policy]
Consultation	Not in relation to this report
Resource	Not in relation to this report
Risk / Legal / Legislative	Not in relation to this report
Opportunities	Ensure that the arts, cultural and creative sectors in Adelaide thrive through a strong relationship between State and Council.
18/19 Budget Allocation	Not in relation to this report
Proposed 19/20 Budget Allocation	Not in relation to this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Not in relation to this report
18/19 Budget Reconsideration (if applicable)	Not in relation to this report
Ongoing Costs (eg maintenance cost)	Not in relation to this report
Other Funding Sources	Not in relation to this report

DISCUSSION

1. The Government of South Australia (the Government) is seeking contributions to assist in the development of South Australia's 2019-2024 Arts Plan. The Government has included the creative and culture sector in Arts for this submission.
2. Administration seeks Council endorsement for the City of Adelaide's draft submission to meet the 19 April 2019 submission deadline.
3. The Government is inviting responses, of no more than 2,000 words, that will assist South Australians to have increased access to rich and diverse arts activities and experiences wherever they live. The following issues and themes were presented for consideration:
 - 3.1. Ambition: What three or four words or phrases resonate with you that describe or imagine the future of the arts industries in South Australia?
 - 3.2. First Nations Arts and Culture: How do we reinforce existing stories, or tell a new story about first nations arts and culture - about the past and our journey together into the future? What is that story for you?
 - 3.3. Priority Areas and Outcomes: What are priority areas for you? What should we do differently to grow and drive increased sustainability across the arts in South Australia? How do you simply and briefly define SA's role in the Australian Arts sector? What are some opportunities in the future?
 - 3.4. Government and Governance: What is the role of government (funding, advocate, investor, regulator, facilitator)? How should it achieve the objectives of this role(s)?
 - 3.5. Audience and Access: What are some of the key issues and opportunities for South Australia across the following areas:
 - 3.5.1. Diversity
 - 3.5.2. Audience engagement
 - 3.5.3. Rural and remote community participation and access
 - 3.5.4. Corporate participation and support
 - 3.5.5. Philanthropic support and investment for social impact.
 - 3.6. Industry and Innovation: What can be done through the sector to:
 - 3.6.1. Cultivate skills including entrepreneurial and innovation across business and industry
 - 3.6.2. Increase tourism
 - 3.6.3. Harness the opportunities of digital technology
 - 3.6.4. Enhance creative spaces and places
 - 3.6.5. Increase the importance and role of the creative industries in driving the economy
 - 3.6.6. Establish an industry and "point of difference" for South Australia?
 - 3.7. Embedding Arts and Culture: We talk about "integration and embedding the arts" across government and into everyday life. What do you see as the main opportunities and challenges to such pathways?
 - 3.7.1. Government
 - 3.7.2. Everyday life.
 - 3.8. Ecology: Any "ecology" has many parts that are interdependent or may rely on each other for survival, growth and increased sustainability. What are some key issues of the South Australian arts and cultural ecology that could be strengthened to increase overall vibrancy and sustainability? What are the "disrupters" that will emerge and may impact a future ecology?
 - 3.9. Final Thoughts: What are the three key things you wish to happen from this Plan?
4. The submission (**Attachment A**) has been developed by Administration, based on the key themes and questions posed by the consultants developing the Arts Plan, and has reviewed these in line with Council's relevant strategies and policies.
 - 4.1. The invitation from the consultants to make a submission was shared with elected members via e-news on 25 March 2019 and feedback invited.

5. Key phrases included in the submission that describe the City of Adelaide's ambition for the future of the arts industries in South Australia are:
 - 5.1. World Leading Creative State: our rich culture of arts and creativity is a driving force that makes South Australia one of the most liveable places in the world.
 - 5.2. Lifelong Creativity: a state where artists, enterprise and audiences flourish, embracing the creativity of all histories and backgrounds, across all ages, abilities and career stages.
 - 5.3. Globally renowned cultural destination: for artists and visitors alike.
6. To achieve these ambitions, the priority areas and outcomes that are recommended in the submission are summarised as:
 - 6.1. Highlighting the instrumental value of the arts (where art is used as an instrument to achieve the varied aims of Government, and beyond) in a sophisticated way and advocate for its contribution to society.
 - 6.2. Funding must be enough to enable creatives and organisations to sustain their practice and enterprise, and to capitalise on national and international opportunities and explore opportunities for commercialisation.
 - 6.3. Develop a new Public Library Service Memorandum of Agreement that retains CPI growth factor and recognises the role that the City of Adelaide Library Service plays for the State as a Capital City Library.
 - 6.4. Fully integrate culture and creativity into state-wide master planning and sustainable land-use development plans and investigate mechanisms for a funding commitment to art in all developments.
 - 6.5. Develop partnerships with complementary sectors such as health, education and across all levels of government and industry; and prioritise collaboration using public-private partnerships to advance the creative and cultural agenda.
 - 6.6. Amplification of the UNESCO Creative Music City Designation working with the AUCOM Executive Committee to develop a sustainable management and funding model that supports the AUCOM office and delivers a program involving key stakeholders and public-private partnerships.
 - 6.7. Explore collaborative opportunities to position Adelaide as an epicentre of screen and creative industries and culture, supporting creators and consumers of film, technology, gaming and animation.
 - 6.8. Work in collaboration across the arts sector to develop and promote a comprehensive and diverse calendar of festivals, events and activities with arts and creativity evident everywhere, inside and outside, day and night.
 - 6.9. Develop or adapt grant programs to increase direct funding to artists, creatives, makers and organisations that initiate new public art or preserve and amplify existing assets. Investigate opportunities for matched funding across State and local government with shared assessment panels.
 - 6.10. Develop a Memorials Policy for the State that is strategic and holistic.
 - 6.11. Provide funding support for research into the wellbeing benefits of arts and culture.
7. In conclusion, the three key actions that are highlighted in the submission are:
 - 7.1. An Arts Plan and Department that acknowledges the important past, present and ongoing contribution of Aboriginal and Torrens Strait Islander artists and culture to the State. This will support the living, ongoing dynamism of South Australia across time and imagining its future, with sustainably funded arts, culture and creative industries that can respond to the complex, rich and unique character of this City and State and its people through creative practices and art;
 - 7.2. Commitment to the development of a Creative State Strategy that positions South Australia as an epicentre of screen and creative industries and culture, supporting creators and consumers of film, technology and animation; and
 - 7.3. The development of a creative and cultural tourism marketing pillar that highlights and amplifies Adelaide and South Australia's designation as UNESCO Creative City of Music with one of the liveliest music and festival cities in the world.

ATTACHMENTS

Attachment A – City of Adelaide Submission to the development of South Australia's 2019-2024 Arts Plan

- END OF REPORT -

South Australia's Arts Plan: City of Adelaide Submission

(DRAFT 4/04/2019)

Please find following the City of Adelaide's responses addressing the suggested themes and questions in consideration of a new Arts Plan for South Australia.

1. AMBITION

What three or four words or phrases resonate with you that describe or imagine the future of the arts industries in South Australia?

- **World Leading Creative State:** our rich culture of arts and creativity is a driving force that makes South Australia one of the most liveable places in the world.
- **Lifelong Creativity:** a state where artists, enterprise and audiences flourish, embracing the creativity of all histories and backgrounds, across all ages, abilities and career stages.
- **Globally renowned cultural destination:** for artists and visitors alike.

2. FIRST NATIONS ARTS AND CULTURE

How do we reinforce existing stories, or tell a new story about first nations arts and culture – about the past and our journey together into the future? What is that story for you?

Our City and our State has so much rich history to learn from. From our everlasting commitment to reconciling with the Kaurna people of the Adelaide plains, other Aboriginal Language Groups and other First Nations to our appreciation of our cultural heritage, diversity and architectural history.

- Acknowledge and showcase the past, present and ongoing contribution of Aboriginal and Torres Strait Islander artists and cultures. In consultation with the Aboriginal communities, create opportunities for Aboriginal and Torres Strait Islander artists and arts and cultural organisations to participate in a full range of artistic and cultural activities.
- Strengthen Aboriginal organisations' existing and developing connections across and within the broader cultural community.
- Provide culturally appropriate support and financial assistance for Aboriginal and Torres Strait Islander artists and cultural organisations.
- On-going development and support for Aboriginal and Torres Strait Islander creative and cultural spaces together with the development of an Aboriginal Cultural Centre in Adelaide.
- Meaningful consideration of Aboriginal and Torres Strait Islander culture in master planning, land-use instruments and development approvals processes.

3. PRIORITY AREAS AND OUTCOMES

What are priority areas for you? What should we do differently to grow and drive increased sustainability across the arts in South Australia? How do you simply and briefly define SA's role in the Australian Arts sector? What are some opportunities in the future?

The City of Adelaide is a city Designed for Life. Setup for balance, growth and prosperity the City of Adelaide has fostered a rich culture of arts and creativity; driving positive economic, environmental, social and cultural outcomes and creating one of the most liveable cities in the world.

- The Arts Plan needs to highlight the instrumental value of the arts (where art is used as an instrument to achieve the varied aims of Government, and beyond) in a sophisticated way and advocate for its contribution to society. This includes recognising its economic benefit to the State along with its role in contributing to community development, social capital, inter-cultural understanding, innovation, technological advancement, environmental sustainability, public safety, and cultural tourism.
- Funding must be enough to enable creatives and organisations to sustain their practice and enterprise, and capitalise on national and international opportunities and explore opportunities for commercialisation.

- Develop a new Public Library Service Memorandum of Agreement that retains CPI growth factor and recognises the role that the City of Adelaide Library Service plays for the State as a Capital City Library.
- Fully integrate culture and creativity into state-wide master planning and sustainable land-use development plans and investigate mechanisms for a funding commitment to art in all developments.
- Develop partnerships with complementary sectors such as health, education and across all levels of government and industry. Prioritise collaboration using public-private partnerships to advance the creative and cultural agenda. Look at bringing together the leaders of infrastructure and heritage, neighbourhood revitalisation, public health and education, tourism and economic development projects and leaders of key industry sectors like film production, gaming development or music producers and work to inject music, art and the creative industries into each area of focus and its strategic actions – deliberately and intentionally.
- Amplification of the UNESCO Creative Music City Designation working with the AUCOM Executive Committee to develop a sustainable management and funding model that supports the AUCOM office and delivers a program involving key stakeholders and public-private partnerships.
- Explore collaborative opportunities to position Adelaide as an epicentre of screen and creative industries and culture, supporting creators and consumers of film, technology, gaming and animation.
- Work in collaboration across the arts sector to develop and promote a comprehensive and diverse calendar of festivals, events and activities with arts and creativity evident everywhere, inside and outside, day and night.
- Develop or adapt grant programs to increase direct funding to artists, creatives, makers and organisations that initiate new public art or preserve and amplify existing assets. Investigate opportunities for matched funding across State and local government with shared assessment panels.
- Develop a Memorials Policy for the State that is strategic and holistic.
- Provide funding support for research into the wellbeing benefits of arts and culture.

4. GOVERNMENT AND GOVERNANCE

What is the role of government (funding, advocate, investor, regulator, facilitator)? How should it achieve the objectives of this role(s)?

The City of Adelaide commends the development of an all of government approach to cultivate the arts and creative culture of the State. We look forward to working together as a collective to build on joint strengths and to use our shared resources more effectively and efficiently.

- An Arts Department led by a dedicated Arts Minister in order to provide the sector the attention required to advocate for and drive culture and arts in South Australia.
- Priority responsibilities should include delivery of the Arts Plan through advocacy, facilitation and connection across State Government and the wider arts sector; along with a focus on measurement and communication. Opportunity exists to work with the Federal Government and City of Adelaide to align measures that are outcomes (rather than outputs) focussed. And incorporate outcome measures in respect to economic impact, wellbeing and cultural engagement.
- Increased transparency in decision making in relation to funding.
- The broad scope of Local Government roles in arts and culture should be identified in the Arts Plan with specific mention to the pivotal role that the City of Adelaide plays as a Capital City Council.
- The role of all local councils in supporting arts and culture needs to be addressed as local councils play an essential role in our community through grants for small projects, cultural infrastructure, professional development and information sharing. Strategies that recognise and support the capacity of Local Government to contribute to arts and cultural development will be important, noting that the combined investment by local government nationally in 2017-18 on arts and heritage was \$1.7 billion, representing over 27% of total national investment by all governments (ABS 2018).
- The cultural planning undertaken by councils with their communities, including Aboriginal and Torres Strait Islander, should be drawn upon to inform State planning, partnerships and funding decisions.

- That City of Adelaide be recognised as a partner in the ongoing development and delivery of public art installations on land owned by City of Adelaide.

5. AUDIENCE AND ACCESS

What are some of the key issues and opportunities for South Australia across the following areas?

The City of Adelaide Strategic Plan 2016-2020 envisions Adelaide as a welcoming and dynamic city full of rich and diverse experiences. We are people focussed and work to enable the community, including residents, workers, businesses, students and visitors, to thrive. We therefore view audience engagement as a fundamental goal of any Arts Plan.

a. Diversity

- Reflection of greater diversity (including gender, age, accessibility, Aboriginal representation, multiculturalism and creative leadership) in support of an inclusive arts sector that reflects contemporary Australia.

b. Audience engagement

- There are a variety of factors affecting arts participation, ranging from the perceived irrelevance of cultural offerings, to economic, cultural and educational barriers for both receptive participants and those wanting to create art.
- Create interactive and participatory educational content in the form of maps, tours, and guides, podcasts, games, apps that engage audiences, recognising that social media is an organic advocate and successful channel to build awareness.
- Investigate mechanisms to support the community to invest in cultural and creative products.
- Support Public Libraries to become cultural creative hubs and venues with exhibition, maker, music and creative spaces.
- Commission new artworks that reinterpret and reimagine existing or historic public artworks for new audiences.
- Support the arts industry to develop a model and legal structure where audience data is considered a shared repository of insights, so that audiences can be nurtured and grown in a consistent and efficient way across the sector, and best practice promotion is installed in all circumstances.

c. Rural and remote community participation and access

- Strengthen existing and create new avenues for linkage of arts and cultural activity across the State. Opportunities exist to broaden city-based activity, as well as to bring regional artists to the metropolitan areas.
- Embed mentoring in collaborations that link artists and art organisations across the State.

d. Corporate participation and support

- Encourage the private sector to embrace public art as a defining characteristic of Adelaide's built environment and a valuable component of new building projects.
- Explore opportunities for an incentive scheme or planning levers to increase public art and cultural expression in public and private development.

e. Philanthropic support and investment for social impact.

- Provide support to connect philanthropic organisations with cultural enterprises and encourage private, government and philanthropic projects.

6. INDUSTRY AND INNOVATION

The City of Adelaide understands the importance of creative and cultural industries and acknowledges the possibilities for connecting arts and creative culture with other industries as a means to inspire, to engage, to innovate, to flex, to disrupt, to challenge and to advance.

What can be done through the arts sector to:

a. cultivate skills including entrepreneurial and innovation across business and industry

- New course offerings from Adelaide's and the State's universities and TAFEs including creative leadership programs and technical courses.
- Leverage the Government's commitment to co-fund Skilling SA with the Australian Government to create and support creative and cultural apprenticeships and traineeships. As part of the special migration status for skilled workers given to SA, include a review of the skilled migrant occupation list, with focus on the creative and tech industries as acute areas of need, in addition or as an adjunct to the State Government's Supporting Innovation in SA (SISA) Visa pilot.

b. increase tourism

- Create and facilitate memorable experiences that highlight South Australia's place on the world stage as a leading State of Creative Culture.
- Build on Adelaide's designation as a UNESCO Creative City of Music and its reputation as one of the liveliest music and festival cities in the world with an outstandingly diverse, rich and thriving arts sector.
- Promote and showcase multiculturalism and Aboriginal culture and support local organisations to express this heritage.
- Work with the City of Adelaide to promote opportunities and develop projects to showcase the City and South Australia's unique heritage and character as a catalyst for sustainable growth and to grow the heritage tourism market.
- Support the creative industries in their work to connect internationally, with key markets like the Asia-Pacific region, North America and Europe.
- Work with partners to improve the arrival experience of tourists at Adelaide International Airport and other entry points to South Australia.

c. harness the opportunities of digital technology

- Further development and support of Adelaide Connect and Ten Gigabit Adelaide.
- Incentivise cultural, creative, music entrepreneurship and start-ups as one of the most crucial elements of a sustainable Creative State, especially as innovation in this area can pertain to other urban challenges, like public health, education or community engagement.
- Collaborate with partners to create a single digital platform for sharing and promoting the diverse and rich South Australian cultural collections.

d. enhance creative spaces and places

- Explore options for policy and regulatory reform that will enable adaptive re-use of buildings and allow more creative and cultural opportunities in private dwellings.
- Focus on creative industries and development of Cultural Hubs – Aboriginal Cultural Centre, Contemporary Art Gallery, performance space, concert hall, world class public art, as part of the development of Lot Fourteen.
Encourage artistically diverse and accessible public art where people can discover, interact and participate in new and creative experiences throughout the City, day and night, all year round.

e. increase the importance and role of the creative industries in driving the economy

- Develop a focused strategy to champion and support the State's creative industries, spanning screen, arts, culture, music and design.
- Bring together the leaders of the creativity, arts, business, university, education and entrepreneurial sectors to foster collaboration, reduce barriers and advance opportunities for business growth.
- Create a system that encourages the involvement of artists at the earliest stages of project planning and design.
- Facilitate a creative industries community of practice to share and leverage leadership, strategy, and knowledge management across disciplines.

- Funding to evaluate the existing ROI and prepare a cost benefit analysis, relating to potential investment in screen-based creative and allied industry sectors and culture in Adelaide.

f. *establish an industry and “point of difference” for South Australia?*

- Use the UNESCO Creative City designation to promote the State as a creative industries hub and destination.
- Develop, build and upgrade infrastructure that supports cultural activities.
- Support peak cultural organisations and Councils in their efforts to raise the profile of South Australia as a great place to work and live. Build on our existing reputation as a sophisticated, brave, bold, creative, collaborative and connected arts and cultural community that is innovative and easy to access.
- Work with partners and key stakeholders to develop Adelaide as the premier international arts market, especially within the Asian region.

7. EMBEDDING ARTS AND CULTURE

We talk about “integration and embedding the arts” across government and into everyday life. What do you see as the main opportunities and challenges to such pathways? We would like responses in two parts:

The City of Adelaide believes that culture is the essence of our city, recognising that it is what we value and celebrate, and what makes us unique. Our Cultural Strategy 2017-23 acknowledges the importance of connecting people to cultural experience, understanding and meaning throughout their lives. It also emphasises that cultural vitality is fundamental to everything we do.

a. *Government*

- Ongoing communication of the meaning and value of arts and creative practice and its fundamental continuation to all aspects of life. This is necessary to counter-act the perception that the arts is a nice-to-have activity, an unsophisticated sector and highly subsidised. Reshape communications where the economy is viewed as benefiting from the arts, rather than being the central driver.
- Strengthen relationships and build partnerships with other sectors including health, education, tourism, social services, business, and governments.
- Promote the use of artists and creatives in design of and inclusion of public art in all State infrastructure development, whether bridges, streetscapes, lighting, schools, hospitals or other projects.
- Support programs that activate civic and public spaces through temporary public art installations, events, performances, and happenings.
- Simplify the grants process, making it easier to access grants, and engage with government.
- Use the grants process to fund new voices (practitioners, multicultural communities and small to medium sized organisations).
- Align grants and project funding to demonstrate the wellbeing benefits to participants and audiences.

b. *Everyday life*

- An Arts Plan of relevance to everyone in the community, regardless of their level of engagement in culture.
- Build awareness of the contribution that arts and culture make to South Australian’s lifelong learning and quality of life.
- Adequate funding provided to recognise the role of libraries in delivering and enabling government services which are now only accessible online.
- Improve access to and participation in cultural life, in particular for young people and marginalised or vulnerable groups and individuals.
- Recognition of creativity and culture in connecting and including people in neighbourhoods.

8. ECOLOGY

Any “ecology” has many parts that are interdependent or may rely on each other for survival, growth and increased sustainability. What are some key issues of the South Australian arts and cultural ecology that

could be strengthened to increase overall vibrancy and sustainability? What are the “disrupters” that will emerge and may impact a future ecology? Some components of an arts ecology may include the following segments:

The City of Adelaide advocates that the Arts Plan allows for the wide development of all parts of the arts ecology, and recommends that the foundations for growth are education, mentoring, collaboration and shared learnings.

- The need for talent retention in the arts and creative sectors in South Australia.
- Plan for Lot Fourteen that will help to attract and retain creative talent.
- Embrace a broad definition of public art that includes the various ways art and culture engage with the public, including festivals, parades, and other social and community-based practices and experiences.

Education

- Recognition of the importance of creative thinking within the curricular and encourage STEAM outcomes.
- Support opportunities for skills training and participation in the creation, production, exhibition and performance of art.
- Encourage arts organisations to expand resources and programming, for all backgrounds and life stages, including people with a disability and older people.

Emerging artists

- As well as reflecting the needs of professional artists and arts workers, the Arts Plan needs to cater to an arts industry encompassing a full spectrum of practice, from amateurs, emerging, pre-professional and semi-professional artists as well as hobbyists, covering both receptive and productive participation.
- Support professional development and capacity building programs for artists, creatives, makers and community organisations.
- Create specific opportunities for the next generation of artists.

Mid-career artists

- Invest resources in artistic exploration and innovation.

Established artists

- Encourage a broad-based appreciation of the breadth and depth of artistic excellence in South Australia including through the maintenance of awards.

Small to medium companies

- Increased and sustained funding to strengthen the capacity of small to medium arts and cultural organisations across the State, as these companies underpin the ecology of the entire arts sector.

Larger companies

- Enhanced flexibility – to enable both government and companies to respond to opportunities, unforeseen issues and changing environments.
- Balanced funding and access to performance spaces to ensure support for the State's home companies.

Venues and other infrastructure

- Community scale facilities need to be recognised as key considerations in the Arts Plan, supported by co-funding to maintain them as vital assets that enable cultural vitality (much like the way investment in open space, recreation and sporting facilities is managed through the Office for Recreation, Sport and Racing).
- The arts sector relies on collaboration and strong networks to function effectively. There needs to be a greater emphasis on collaborations or partnerships to promote shared services and resources, for

example co-working spaces or a fundraising manager being shared amongst two or three small arts organisations in the same locality.

- Libraries are key areas for new cultural and creative spaces. As libraries are established venues for community engagement, they need to be adequately funded to enable them to be expanded into multidisciplinary arts and creative hubs.

Collecting institutions, museums and galleries

- Connected collections - Pieces in conversation that highlight shared relationships and provide new insights and encourage exploration across all collections.
- Digital mapping and sharing of collections.

Festivals

- Work with existing festivals to increase the number and diversity of audiences from across all life stages.
- Provide funding for smaller cultural festivals and events to activate the State across the whole year.
- Expand on the opportunities for satellite or niche festivals within larger festivals.

9. FINAL THOUGHTS

What are the three key things you wish to happen from this Plan?

- An Arts Plan and Department that acknowledges the important past, present and ongoing contribution of Aboriginal and Torres Strait Islander artists and culture to the State. This will support the living, ongoing dynamism of South Australia across time and imagining its future, with sustainably funded arts, culture and creative industries that can respond to the complex, rich and unique character of this City and State and its people through creative practices and art.
- Commitment to the development of a Creative State Strategy that positions South Australia as an epicentre of screen and creative industries and culture, supporting creators and consumers of film, technology and animation.
- The development of a creative and cultural tourism marketing pillar that highlights and amplifies Adelaide and South Australia's designation as UNESCO Creative City of Music with one of the liveliest music and festival cities in the world.