



STATE
PLANNING
COMMISSION

STATE PLANNING POLICIES Engagement Report

Section 73 (7) of the Planning, Development and Infrastructure Act 2016

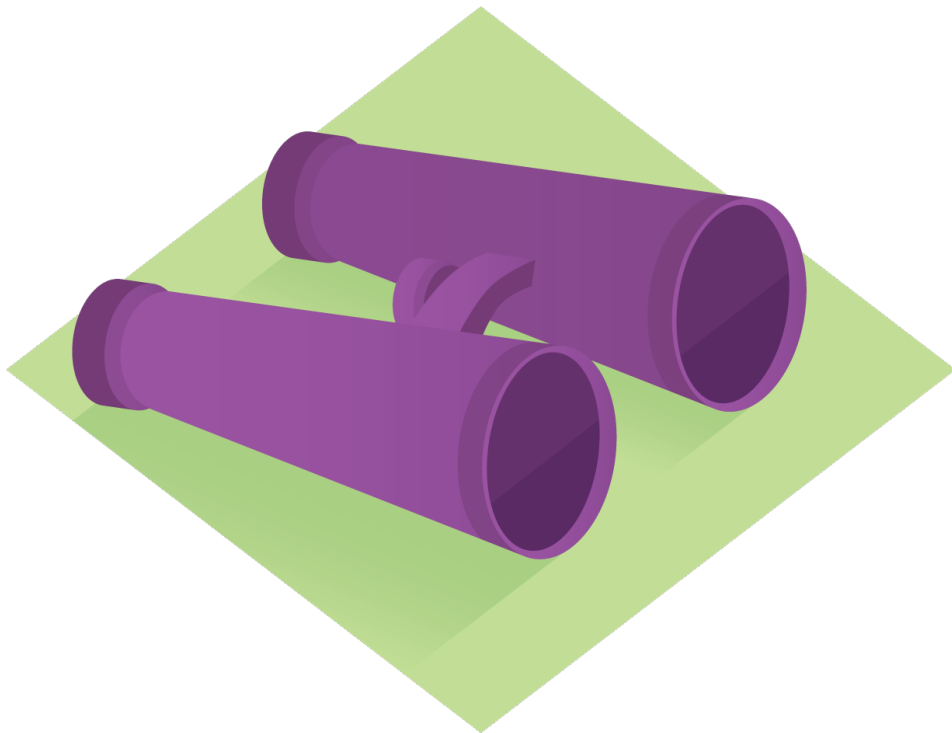


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1 Purpose

This report has been prepared by the State Planning Commission for consideration by the Minister for Planning in adopting the State Planning Policies¹.

The report details the engagement that has been undertaken, the outcomes of the engagement including a summary of the feedback made and the response to the feedback and the changes to the SPPs. In addition, the report evaluates the effectiveness of the engagement and whether the principles of the Community Engagement Charter have been achieved. Any changes to the engagement plan during the process is also outlined.

2 State Planning Policies

The Planning, Development and Infrastructure Act 2016 (the Act) is being introduced in stages over the next two years as part of the most significant modernisation of South Australia’s planning system in more than 20 years. This planning reform represents a once-in-a generation opportunity for all South Australians to improve the way our communities look, grow and change.

State Planning Policies (SPPs) set out the Government’s overarching strategic objectives for the planning system. The policies outline matters of importance to the state in land use planning, development and design and provide a policy environment that enhances our liveability, sustainability and prosperity. They were developed by the State Planning Commission at the request of the Minister.

The SPPs will be the highest order policy document in South Australia’s planning system.

By expressing all state interests in land use planning and development in a single location, the SPPs will provide effective and consistent guidance in planning for South Australia’s future. They build on the objectives and principles of good planning set out in the Act and ensure these principles are embedded in all future decision making.

The SPPs are given effect through the creation of planning instruments, including Regional Plans and the Planning and Design Code. The completion of the SPPs is critical for the delivery of the Code by July 2020, at which time all 72 Development Plans (which contain the planning rules) will be switched off and the new assessment procedures and ePlanning solution will be operational.

The State Planning Commission has now finished the first set of State Planning Policies for the Minister’s consideration. The first five SPPs are required to be prepared in accordance with the Act. These are:

Legislated State Planning Policies

- SPP1 Integrated Planning
- SPP2 Design Quality
- SPP3 Adaptive Reuse
- SPP4 Biodiversity
- SPP5 Climate Change

¹ The Engagement Report is prepared in accordance with section 73(7) of the *Planning, Development and Infrastructure Act 2016* (the Act) and *Practice Direction 2 Consultation on the Preparation of a Designated Instrument 2018*

In addition to the above statutory SPPs, the Minister for Planning requested that the Commission prepare an additional eleven SPPs which represent the social, environmental and economic challenges and opportunities of the state.

Ministerial State Planning Policies

- SPP6 Housing Supply and Diversity
- SPP7 Cultural Heritage
- SPP8 Primary Industry
- SPP9 Employment Lands
- SPP10 Key Resources
- SPP11 Strategic Transport Infrastructure
- SPP12 Energy
- SPP13 Coastal Environment
- SPP14 Water Security and Quality
- SPP15 Natural Hazards
- SPP16 Emissions and Hazardous Activities

3 The Engagement Approach

South Australia’s new planning system is built around feedback from the community, the planning and development industries and other interested parties. The first set of SPPs is no different, having been prepared in collaboration with other state agencies, industry leaders and the community.

The process for amending or creating SPPs is set out in the Act and requires public engagement to take place in accordance with the Community Engagement Charter².

Engagement on the SPPs represents the first time the Community Engagement Charter has been applied under the Act. The Community Engagement Charter outlines a set of five key principles that must be taken into consideration when planning for and conducting consultation and engagement on designated instruments (such as the SPPs).

The Community Engagement Charter has five principles:

- 
- 01 Engagement is genuine
 - 02 Engagement is inclusive and respectful
 - 03 Engagement is fit for purpose
 - 04 Engagement is informed and transparent
 - 05 Engagement processes are reviewed and improved

² For more information on the Community Engagement Charter refer to www.saplanningportal.sa.gov.

The State Planning Commission prepared an engagement plan³ to implement the principles. The purpose of this engagement was to ensure that individuals, organisations' and communities interested in and/or affected by the SPPs had an opportunity to be involved and contribute to the final SPPs. Specifically, the engagement sought to:

- discuss, for the first time, with the public the vision and priorities of our state planning system
- test the proposed vision and planning priorities - making clear what is proposed, checking they are the right priorities, and refining them as required.

Early Engagement on the draft SPPs

The SPPs were prepared over 12 months with significant contributions made by state agencies, industry leaders, community members and planning professionals.

The activities undertaken during this phase include:

- the formation of a state agency reference group to identify existing state policy positions and interests to be transitioned into the SPPs
- three State Planning Commission community workshops. The first two workshops related to policy topics and this information was used for the SPPs and South Australian's Planning & Design Code; and the third dealt more specifically with the SPPs.

What we heard during the community workshops assisted us in developing the draft SPPs prior to formal broader engagement.

Engagement on the draft SPPs

Engagement on the draft SPPs commenced on 16 July 2018 and closed on 21 September 2018 (extended from 7 September).

There were multiple opportunities during this time for the community to learn about SPPs and their role in the new planning system and contribute to discussions about the policy content.

The range of activities during this phase included:

- YourSAy survey and online discussion forum, 16 July to 21 September 2018
- Drop-in sessions held on the 3 and 14 August 2018
- Royal Adelaide Show booth, from the 31 August to 10 September 2018
- Community Engagement Panel meeting on the 8 September 2018
- 18 separate meetings, workshops and briefings with government agencies, authorities, boards, planning and development practitioners and community groups
- Video on DPTI's YouTube channel⁴
- Information and engagement page on SA Planning Portal
- Article in the *Planning Ahead* newsletter.

³ To refer to the Engagement Plan go to http://www.saplanningportal.sa.gov.au/__data/assets/pdf_file/0003/487155/Draft_State_Planning_Policies_-_Communications_and_Engagement_Plan.pdf

⁴ View the YouTube video at <https://www.youtube.com/watch?v=k1WTZWVw9s>

List of meeting, workshops and briefings held

Industry and council engagement, government agencies, authorities and boards

- Storm Water Management Authority briefing 25 July 2018
- Water and Environment Portfolio briefing 26 July 2018
- Regional Development Australia SA Chief Executive Meeting 26 July 2018
- Natural Resource Management Board Presiding Members Meeting 1 August 2018
- Adelaide and Parafield Airports Forum 9 August 2018
- Coast Protection Board 15 August 2018
- State Agency Reference Group Briefing 21 August 2018
- Adelaide and Mount Lofty Natural Resource Management Board 23 August 2018
- SA Heritage Council 23 August 2018
- Native Vegetation Council 29 August 2018.

Planning & Development Practitioners

- Council Planners and Managers Workshop with Local Government Association 1 August 2018
- Minister's Advisory Committees Joint Workshop 7 August 2018
- Planning Institute Australia Social Planners Network 8 August 2018
- The Australian Institute of Urban Studies Workshop 15 August 2018
- Council Connect Live Chat 22 August 2018
- Local Government Association and State Planning Commission Workshop 23 August 2018.

Community Groups

- Conservation Council SA 12 September 2018.
- Norwood, Payneham and St Peters Residents Association 10 August 2018

YourSAy survey

A YourSAy survey was available throughout the engagement and consultation phase. A total of 109 people completed the survey with 21 people participating in the online discussion forum.

Respondents were primarily unrelated to the planning or building industry and were most likely to reside in the City of Adelaide (10.58%), the City of Norwood, Payneham and St Peters (10.58%) and the City of Onkaparinga (8.68%). There was significantly low response rate from those residing in regional or rural council areas (although these communities were better reached via other engagement activities).

Over 40% of responses were received from people aged 55 years or older with 36% of respondents aged between 25 and 44 years of age.

When asked if they agreed with the statement *"The draft State Planning Policies provide a clear vision for planning and design in South Australia"*, more than 50% of respondents agreed with less than 30% disagreeing. Approximately 16% remained neutral.

Respondents were given the opportunity to rate each State Planning Policy in order of priority. The following SPPs were identified as the respondents top five rated SPPs:

- Integrated Planning
- Climate Change
- Design Quality
- Strategic Transport Infrastructure
- Energy

Respondents were asked whether they agreed with the following four statements and to provide some commentary about their response. Responses were generally supportive with all having at least a 70% positive and/or neutral response (See below).

	Agree	Neutral	Disagree
It is clear how the draft SPPs will achieve South Australia’s planning targets	47.5%	22.5%	30%
The draft SPPs address South Australia’s biggest social, economic and environmental needs	45%	17.5%	37.5%
The policies provide sufficient direction to address challenges and opportunities for planning, development and design across South Australia	42.1%	23.68%	34.21%

Table 1: Respondents’ comments

Some respondents indicated they were uncertain or disagreed with the statements, also advised that the SPPs were too high level and required clarification. There were also questions from the respondents about how the policies would be achieved, costed and implemented. There was also a common theme around the policies being too focused on economic development at the expense of environmental, social and community outcomes.

Comments included the following:

“Limiting urban sprawl, is in my opinion, the number one priority for our planning policies going forward.”

“If Adelaide has any chance of becoming a world-class medium sized city, then we need to look at housing density along transport corridors, in the city and surrounding the parklands. Six stories is the ideal height for vibrant communities.”

“Too specific for Adelaide and little for the rest of SA.”

“Whilst the community ie PEOPLE are placed first in this question, in the draft policies the priority would seem to centre on economic priorities.”

“Particularly interested in walkable neighbourhoods and green liveable cities targets and the physical and social benefits for individual people which then support a sense of community – important given recent research re loneliness. But people need somewhere to walk – local shops, facilities, transport options. These are not so accessible in many middle and outer areas. Also worry about the economic priority overwhelming social and environmental.”

“There seems to be a capacity for confusion with so many overlapping policies. It’s unclear in any given situation what the priority would be.”

The survey also asked whether respondents felt ‘well informed’ about the draft State Planning Policies. More than 55% responded yes, with only approximately 20% stating they didn’t feel well informed. When asked what information was missing from the SPPs, responses included reference to “not enough time to understand” and “information is driven too much by population growth and infill development”.

Royal Adelaide Show

DPTI staff spoke to 1700 people at the Royal Adelaide Show about planning reforms and the proposed SPPs, with 157 people responding to a short survey.

The respondents were asked to identify their priorities for how our cities and towns should be developed. A high proportion considered the topic of ‘*our environment*’ (coastal water, water security and quality, protection from natural hazards and emissions) to be the most important, closely followed by ‘*our people and neighbourhoods*’ (housing supply, housing diversity and cultural heritage).

At the show, DPTI were able to identify members of the community interested in participating in the Community Engagement Panel (69 additional people).



Royal Show Adelaide Show visitors take a virtual tour of our new planning system

Community Engagement Panel

On 8 September 2018, a Community Engagement Panel was convened to discuss the draft SPPs. The panel was selected from a group of people that have participated in previous engagement processes e.g. the Community Engagement Charter. The Panel of 24 was comprised of people of mixed ages, gender, cultural diversity and people living in metropolitan Adelaide and regional areas.

The Panel workshop was independently facilitated by Urban and Regional Planning Solutions.



Michael Lennon (State Planning Commission) addressing workshop participants

Community Engagement Panel's comments

The Panel were asked about their initial thoughts and impressions of the draft SPPs. 18 participants were positive about the SPPs and 6 were neutral; with no participants having a negative impression.



Members were then asked to reflect on each State Planning Policy and to 'score' them according to their support and understanding. The following SPPs were scored the highest:

1. Climate Change
2. Energy
3. Biodiversity
4. Water Security and Quality
5. Emissions and Hazardous Activity

Key outcomes from the YourSay survey and Community Engagement Panel

The survey and community panel raised some consistent areas where the SPPs could be improved:

- the language used should be simplified to provide greater clarity and make the SPPs more accessible to communities
- there needs to be more guidance on how to prioritise issues within the SPPs
- infrastructure provision leading to growth should be enhanced via the SPPs
- the SPPs should have a stronger emphasis on environmental sustainability and address the following topics more thoroughly:

- the use of low carbon materials in buildings
- renewable energy
- significant trees
- climate change
- waste management.

Comments on individual SPPs

The YourSAy survey enabled respondents to rate how they felt about each SPP. Likewise, panel members were asked to rate the comment *'I support the approach and aims of each of the draft State Planning Policies'*. The combined results are as follows:

Table 2: Support for SPPs

SPP	YourSAy responses	Community Engagement Panel Responses
1. Adaptive Reuse	78.95% positive, 2.63% neutral, 18.42% negative	52% positive, 33% neutral, 15% negative
2. Integrated Planning	76.67% positive, 7.69% neutral, 15.64% negative	50% positive, 50% neutral, 0% negative
3. Water Security and Quality	67.57% positive, 16.33% neutral, 16.1% negative	66% positive, 17% neutral, 17% negative
4. Coastal Environment	66.67% positive, 11.11% neutral, 22.22% negative	43% positive, 33% neutral, 24% negative
5. Strategic Transport Infrastructure	65.79% positive, 13.16% neutral, 21.05% negative	54% positive, 37.5% neutral, 8.5% negative
6. Natural Hazards	64.86% positive, 18.92% neutral, 16.22% negative	64% positive, 25% neutral, 11% negative
7. Biodiversity	64.10% positive, 15.38% neutral, 20.52% negative	73% positive, 18% neutral, 9% negative
8. Design Quality	58.98% positive, 15.38% neutral, 25.64% negative	64% positive, 31% neutral, 5% negative
9. Energy	57.89% positive, 18.42% neutral, 23.69% negative	77% positive, 18% neutral, 5% negative
10. Housing Supply & Diversity	56.41% positive, 17.95% neutral, 25.64% negative	41% positive, 32% neutral, 27% negative
11. Cultural Heritage	56.41% positive, 15.38% neutral, 28.21% negative	61% positive, 30% neutral, 9% negative
12. Employment Lands	55.26% positive, 26.32% neutral, 18.42% negative	50% positive, 36% neutral, 14% negative
13. Emissions and Hazardous Activities	54.29% positive, 22.86% neutral, 22.85% negative	65% positive, 30% neutral, 5% negative
14. Climate Change	52.63% positive, 23.68% neutral, 23.69% negative	71% positive, 12.5% neutral, 16.5% negative
15. Primary Industries	50% positive, 26.32% neutral, 23.68% negative	63% positive, 26% neutral, 11% negative
16. Key Resources	42.1% positive, 31.58% neutral, 26.32% negative	53% positive, 26% neutral, 21% negative

Written submissions

A total of 141 written submissions were received. All written submissions are available on the SA Planning Portal⁵.

While there was general support for the intent and the purpose of the SPPs, there were also specific areas of interest that required additional investigations, consideration and discussion.

The matters that were raised consistently across each SPP or were a general response are summarised here, followed by a summary of key issues raised about each SPP.

A more detailed summary of issues raised on each SPP is provided in Attachment 1.

4 Key themes

A vision for South Australia

A high level 'vision' for the whole state is needed.

In response

A vision has been incorporated into the document which brings together the overall intent of the SPPs as a policy framework for the planning system.

Conflict between SPPs

There needs to be a clear process for the efficient, transparent and effective balancing of SPPs and guidance on determining what policy will take precedence.

In response

The application of State Planning Policies and the prioritisation of SPPs will occur at the regional planning stage. It is acknowledged that the relevance of some SPPs will vary depending on their spatial application and the physical setting which they are being applied to.

Additional wording to provide clarity on how to manage and prioritise SPPs has been incorporated into the draft document.

Regional context

A stronger regional context is required as many policies do not apply well to regional areas. More detail is required to guide the development of townships, regional centres and rural living areas.

In response

The SPPs are to be applied holistically across the state unless a policy explicitly states where it should be applied. However, it is understood that the terminology across the document wasn't explicit and required refinement. As a result of this recommendation, many of the SPPs have been updated to include wording that relates specifically to our regions, townships and settlements.

⁵ To view the submissions go to https://www.sapanningportal.sa.gov.au/planning_reforms/new_planning_tools/state_planning_policies#public_submissions

In addition and also to remove further ambiguity in the application of the SPPs, the targets which were featured in Part 4 of the consultation draft have been deleted. Where performance targets are required, these have been incorporated into the policy within the individual SPP outlining that when preparing regional plans a target needs to be established to monitor progress.

Role of the SPPs

The role of SPPs within the new planning system needs more clarification.

In response

Several submitters indicated that the implementation and application of the SPPs was not clear and did not provide the guidance that they sought. A review of Part 1 of the consultation draft has been undertaken and sections rewritten to ensure the application and implementation of the SPPs is clear. In addition, an example of the role and subsequent application of the SPPs has been included to provide specific guidance on the role of SPPs through the planning system.

Population growth

Each planning policy should incorporate at least some element of planning for population and demographic changes. A strategic and long-term land release program is also needed, which is coordinated with the provision of appropriate social infrastructure.

In response

The planning system has a role to play in regulating and controlling the physical change in our built environment. It responds to population growth and can influence where this growth can occur. It cannot however control population growth and when this can occur. The Integrated Planning SPP has been updated to reflect this influence and how the planning system will respond to population growth.

Consistent land use planning and development outcomes

This opportunity to reform our planning system must be capitalised on to consolidate our interests and establish a policy framework to drive investment and create a more liveable, prosperous and sustainable state.

In response

The introduction of SPPs which articulate the Government's interests and aspirations of the state allows for a policy framework to be created to guide how we respond to challenges, issues and opportunities. It provides a consistent, whole of government approach to key social, environmental and economic challenges, which in return enables the planning system to respond accordingly.

5 What We Heard and How We Have Responded - *the State Planning Policies*

SPP 1 Integrated Planning

Integrated planning is coordinating the strategic use of land with the necessary services and infrastructure to create liveable and sustainable places that contribute to our prosperity. It enables genuine participation of all stakeholders as part of the planning process.

What we heard

The Integrated Planning SPP was broadly supported, however a number of respondents thought it should be expanded to better address regional issues, particularly around townships and settlements.

The impact of infill growth on the character of neighbourhoods and the preservation of heritage places and areas were also considered to need greater resolution. Many felt that infill and regeneration shouldn't occur everywhere and that the valuable contribution of existing low-density residential areas to liveability, amenity and housing choice should be recognised.

The continued protection of the Environment and Food Production Areas and Character Preservation Districts were identified as important.

The provision of carparking was also considered to be an issue as the shift to public transport is slow. Buses, trains and trams are sometimes at capacity or unreliable and active transport options are not always available.

How we have responded

The notion of locating additional infill development in areas well serviced by public transport, is the very nature of integrated planning. In order for South Australia to remain a liveable, prosperous and sustainable state, we need to ensure that we are utilising our land and infrastructure efficiently.

Additional content has been included to ensure the relevance to regional areas.

Wording has been included to ensure areas of urban renewal and regeneration are strategically identified. The identification of areas requires detailed investigations and analysis on a range of matters. This can be done through Regional Plans. Furthermore, the SPPs provide direction for the consideration and recognition of protecting and conserving heritage areas and places; it's the role of the Regional Plan to identify the actual sites and areas.

The SPPs provide an opportunity to set a policy framework that will encourage a greater use of our active travel networks thus reducing the reliance on private vehicles. This in turn also negates the need or continued use of local streets networks for ongoing street carparking. No changes have been made to the SPPs on this matter.

While the SPPs recognise the importance of the EFPA and provides guidance on its inclusion within the planning system, amending its boundaries to include or remove additional areas requires legislative review and process. This is outside the scope of the SPPs. Consideration to the importance and role of the Character Preservation Districts has been incorporated into the SPP in addition to further recognition in SPP 8 – Primary Industry.

In relation to issues about access to public transport, the policies provided are relevant across the State.

SPP 2 Design Quality

Good design improves the way our buildings, streets and places function, making them more sustainable, more accessible, safer and healthier. The integration of design within the planning system encourages creative solutions to complex social, economic and environmental challenges including those arising from a more compact urban form.

What we heard

There was general support for the Design Quality SPP and the integration of design into the planning system. There were however some concerns expressed about the ambiguity of the Principles of Good Design, e.g. the principle around ‘context’ and how this could be applied to a place where a new desired character is sought.

Many requested greater emphasis on universal design, Water Sensitive Urban Design (WSUD), energy efficiency, sustainability, green infrastructure, Crime Prevention Through Environmental Design, and waste management in this SPP.

Many also considered that the policy should be strengthened to better reflect South Australia’s special characteristics, quality of life and challenges, and to acknowledge our established character and heritage.

Importantly, there should be greater direction about design in the public and private realms—especially high quality, accessible open space—and greater links between good design and healthy living and quality of life.

How we have responded

The policies have been refined relating to WSUD and sustainable design to emphasise their intent.

The University of North Carolina’s Principles of Universal Design are considered best practice and as such have been incorporated into the SPP.

The Principles of Good Design have also been updated in accordance with comments on their relevance to the new planning system. This is to ensure they are explicit and relevant.

SPP 3 Adaptive Reuse

Adaptive re-use of buildings, sites and places in both urban and rural settings can have cultural, social, economic and environmental benefits. It can rejuvenate our neighbourhoods and strengthen a sense of place and familiarity with the surrounding environment. A strong link to the past can enhance a sense of place, history and belonging to a particular community and unlock new opportunities and promote innovation in design.

What we heard

There was wide support for enabling the reuse of underutilised buildings on the understanding that safety and amenity building rules remain critical considerations and that their reuse considers the area’s broader land use and urban design objectives.

It was agreed this policy should be extended across the state as other council areas also wish to see their historical/disused/under-functioning buildings appropriately utilised, maintained and enjoyed. For example, disused buildings in industrial precincts at Port Adelaide, Lonsdale and Tonsley could provide opportunities for creative innovative technologies, under-resourced communities and temporary uses.

It was agreed that the criteria for adaptive reuse be written with caution to ensure that the policy does not lower building and/or planning standards nor encourage intentional vacancy to take advantage of any incentives.

Respondents also suggested the policy should refer to the embodied carbon benefits in the adaptive reuse of buildings and structures and the associated waste minimisation benefits.

The reuse of State and Local Heritage Places was discussed and it was recommended that there be a careful balance between the flexibility required for their reuse and their heritage value.

How we have responded

This policy has been amended to be applied more broadly to encourage adaptive reuse across the state (including regional areas and townships) as this can assist in the preservation of the character and heritage value in addition to bringing economic benefits.

It was also important to reiterate that the adaptive reuse of buildings does not only refer to those buildings with a local or state heritage listing through the policy.

SPP 4 Biodiversity

South Australia's unique biodiversity contributes to our quality of life, supports our economy and provides life supporting functions such as clean air, water, sea and land. Maintaining and enhancing a healthy, biologically diverse environment ensures greater resilience to climate change, increases productivity and supports a healthy society.

What we heard

This policy was well supported and was considered to provide an effective mechanism for enhancing biodiversity across the state. There was, however clarification sought from submitters regarding the reconciliation of biodiversity with urban density and there was strong support for ongoing protection of biodiversity from development.

To improve this policy, respondents suggested it should be expanded to increase and enhance landscapes and biodiversity, and to support connectivity and opportunities for migration of, and habitat creation for, fauna, flora and native vegetation.

Submitters also proposed that biodiversity within urban areas such as parklands, creeks, coastal areas and streetscapes should be better addressed, particularly in light of the loss of biodiversity due to infill and smaller yard sizes.

It was also identified that this policy should reference marine biodiversity, coastal and riverine ecosystems and significant and regulated trees.

How we have responded

In response to the identification of a gap in policy relating to biodiversity within urban settings and that biodiversity can be reinstated post development, New policies relating to enhancing the biodiversity in urban areas and townships have been incorporated. In addition, the value of modified landscapes has also been included as an additional policy.

Feedback also identified a lack of policy relating to biodiversity within our marine environment. However, it is more appropriate for policy relating to the marine environment to be included in SPP 13 – Coastal Environment and as such these have been incorporated into this SPP.

SPP 5 Climate Change

Climate change will impact all areas of our society. Our future prosperity, the liveability of our cities and towns, the health and wellbeing of our communities and the resilience of our built and natural environment all depend on how well we adapt to and mitigate the impacts of climate change.

What we heard

Respondents considered that this SPP provided a comprehensive and well-considered approach to developing a planning system that will respond to the effects of climate change.

To improve this policy, respondents suggested that as climate change impacts are not geographically uniform across the state, scientific analysis should be used to understand the impacts in a variety of urban and regional areas to develop appropriate adaptation responses.

In addition there was support and commentary on the impacts of climate change and mitigating this through construction and ongoing building maintenance – both in the commercial and domestic sectors. There was strong support for policy that encourages climate-smart development and designing buildings to reduce reliance on water, energy, waste and unsustainable building materials at both the construction phase and throughout the life of the building. It was also suggested that policy is created which recognises the embodied energy of existing buildings.

Responses also stated that it is important to recognise the embodied energy in construction materials. Recycling building materials and adapting building is a better use of embodied energy instead of standard practices of demolition and redevelopment.

How we have responded

It is important to recognise the various initiatives that can mitigate the impact of climate change. There was overwhelming support for inclusion of additional policies relating to increasing our green canopy and maximising opportunities for carbon storage. While the SPPs cannot provide solutions to localised climate change impacts, it does set the policy framework to enable those preparing regional plans to better understand how climate change affects their local areas and how best to mitigate these.

Rather than re-writing the policy content within this SPP, it was were refined, terminology changed with the intent enhanced.

SPP 6 Housing Supply and Diversity

Housing is an essential part of people's health and wellbeing. Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations. With the changing composition of our community and our desire to live more sustainably, our housing supply needs to become more diverse in both metropolitan Adelaide and regional township locations.

What we heard

Different views were put forward about incentivising affordable housing; however, it was agreed by all that the supply of affordable housing should not lead to any reduction in good design or sustainability requirements; nor should it diminish the established character of any area or exceed carparking availability.

Some suggested there was too much emphasis on aged care and small lot housing and suggested that the policy should be expanded to include other housing types such as dependent accommodation; laneway housing; and accessory housing such as granny flats. These options may help the planning system become more responsive to changes in housing requirements.

To further improve this policy, respondents also recommended that housing growth be linked with the capacity of existing infrastructure and that costs for infrastructure be shared appropriately and equitably.

The unique circumstances of regional areas such as rural living, shack areas and other settlements should be considered and better guidance on the scope and scale of activity centres and mixed-use corridors was needed.

How we have responded

While this policy received wide support, additional policy relating to higher density in strategic locations has been introduced. The promotion and adaptation of universal design principles has also been incorporated post engagement and is supported through incorporation of these in SPP 2 – Design Quality.

Policies have also been strengthened to give greater consideration of population growth projections and the lifestyle needs of our communities.

As a result of feedback, the 15% affordable housing target has been incorporated into a policy. In addition, policy has been expanded to facilitate a greater range of housing choices at various locations including those within infill settings and in regional towns and settlements.

To incentivise the delivery of affordable housing through the planning system, the mechanism would be policy dispensations or similar. While many submitters expressed concern, the dispensations would be commensurate with the expectations and planning policy set for a particular area.

An additional policy for rural living has also been incorporated to ensure that the delivery of housing reduces impact on the expansion of existing townships and does not fragment valuable primary production land.

SPP 7 Cultural Heritage

South Australia's cultural heritage reflects the diversity, unique features and key moments in our state's history our state and contributes to our community's understanding of its sense of place and identity. The enduring, living, spiritual and cultural connection to the land by South Australia's first people is recognised and acknowledged as an essential part of our cultural heritage.

What we heard

Respondents suggested this policy should elevate the value and importance of heritage places and areas.

Responses suggested providing more detail about a heritage framework. Other respondents called for a way of addressing the impacts of development occurring on adjoining/adjacent buildings so that they could respond to local context better. Many sought a better understanding about transitioning existing heritage and character areas and places (including contributory items) into the new planning system.

Respondents also thought that the value of cultural vitality to the state should be better acknowledged and that policies are needed to develop and promote the state's heritage to increase tourism and the economy, for example, cultural/significant landscapes such as the Barossa Valley.

Many respondents also considered that the recognition of Kurna and Indigenous associations and connections to the land should be strengthened and that generally the policy does not adequately reflect this.

How we have responded

Submissions identified the lack of content relating to character and contributory items. Additional policy was included to acknowledge the continued protection of our built form heritage. The role of planning in the protection and consideration of heritage has also been included.

SPP 8 Primary Industry

South Australia's agriculture, forestry, fisheries and aquaculture industries are fundamental to our prosperity and identity. Along with their associated tourism and service industries—and the infrastructure that supports their production and marketing—primary industry value chains are major generators of economic activity and employment throughout the state.

What we heard

This policy was considered to provide a clear focus on the key opportunities and challenges that confront land use planning for primary industry in South Australia.

Respondents felt that primary producers should have the freedom to be able to continue to operate their farming businesses without encroachment from competing land uses such as urban sprawl, interface issues, mining, or other incompatible forms of land use. They also indicated that it was important to recognise the need for ageing in place to ensure successional farming.

Respondents also suggested the policy should seek to establish greater efficiencies in established agricultural lands before pursuing new land in areas with high biodiversity value. Efficiencies could include diversification of farming activities, value adding processes and allied food industries, as well as farmers accommodation. The policy should distinguish between the scale of operations, as small-scale doesn't always require the same regulation as large-scale operations.

It was also recommended that the tension between protection of watersheds and primary production and conservation objectives should be addressed.

How we have responded

While the consultation process identified a need to ensure business diversification across the primary industry sector, it was also recognised that this SPP adequately captured this intent.

The inclusion of policy relating to ageing in place in our regional and rural areas has been included in SPP 6 - Housing Supply and Diversity as this policy has been expanded, recognising the need for a wider, more diverse range of housing choices.

The solutions to support primary industry adapt to climate change vary and as such additional policy has been included in SPP 12 – Energy which encourages small scale advances in energy provision (such as localised solar farming) to support primary industry to be more sustainable.

SPP 9 Employment Lands

Providing a suitable supply of land for employment uses is critical to support job growth and the economic prosperity of the community. The planning system needs to support the diversification of our economy into a range of sectors and remove barriers to innovation. It is critical that the right signals are sent to the market to attract interest and investment across South Australia.

What we heard

Respondents suggested this policy should recognise the vast range of employment lands and that each had different location needs and impacts. For example, small-scale employment such as home-based work had minimal impact on residential amenity and should be facilitated.

Other feedback suggested the policy should also enable a range of commercial activities to be located close to the city in order to provide accessible services and employment to the local community without being 'pushed out' and replaced with residential buildings.

Many respondents thought the policy gave too much emphasis to the CBD and that reference to other activity centres should be included. This would allow for major centres such as Elizabeth Regional Centre to be developed and enhanced, and play a key role in delivering higher level services and facilities. Others stated the importance of the centres' hierarchy and suggested it be reviewed. Out-of-centres development was not supported by some.

A clear and consistent approach to dealing with sensitive land uses and higher impacting development is required from the planning system.

Many respondents also requested more detailed policy to promote our key growth areas of education, defence, energy, tourism, agriculture and agricultural based technologies, health and medical mining and professional and information services.

How we have responded

The policy has a focus on enabling the continuation of Adelaide City's role in being a specialty health and education precinct. The recognition of our key drivers (education, defence, science etc) of employment across the state has been incorporated into policy content. This is further supported by additional wording added to the corresponding narrative.

In addition the narrative in the SPP has been amended to provide greater insight into activity centres and their contribution to the retail sector. A new policy regarding the protection of higher-order centres has been incorporated into the policy.

SPP 10 Key Resources

Our valuable mineral and energy resources are the property of the Crown and are managed by the state on behalf of all South Australians. The mineral and energy resources sectors will continue to fuel economic development, support the growth and development of our communities, and provide an income stream to help fund infrastructure and support construction affordability.

What we heard

Respondents suggested it should strengthen the protection of high-quality agricultural land, the food bowl and areas of high biodiversity value from the effects of mining. This includes ensuring that adequate rehabilitation follows the decommissioning of any mine.

The policy also needs to address the fundamental conflict between fossil fuel extraction/use and climate change mitigation and the environmental issues associated with the energy, extractive and mineral industries in general.

Many respondents also requested a specific reference to gas pipelines being a key resource infrastructure.

How we have responded

Both SPP 4 - Biodiversity and SPP - Primary Industry include sufficient policy for the protection of our natural environment, the Environment Food Production Area and the Character Preservation districts from the encroachment of incompatible uses, which includes mining.

The intent of this SPP is to provide confidence in our mining sector that it too will be protected in order to supply the state with adequate energy to support our businesses and that energy supply is reliable and efficient.

SPP 11 Strategic Transport Infrastructure

The economic and social prosperity of South Australia relies on a transport system that is safe, integrated, coordinated, dependable and sustainable. Transport systems that provide effective connectivity underpin access for business to local, national and international markets; link people with employment, goods and services by providing travel choices; and contribute to a healthier and more connected society.

What we heard

Respondents discussed the tension between priority and high-growth corridors and the need to separate these from sensitive land uses. It was suggested that heavy transport routes (as opposed to high transport routes) be identified and include noise attenuation infrastructure.

These strategic transport corridors (road and rail) should be protected and value-adding development adjacent to strategic infrastructure should be facilitated. The rural road networks for primary producers also needs improvement.

Issues around congestion, the frequency of public transport services and lack of infrastructure for cycling, especially along strategic transport corridors, were also raised.

It was suggested that more people would utilise public transport if there were more park-and-ride facilities.

The importance of transport infrastructure that was well-designed and that managed its impact on the urban environment was also considered to be important.

A statement on airport public safety zones, lighting areas, wildlife buffers, the Australian Noise Exposure Forecast contours and building restricted areas and development around airports was also requested.

How we have responded

Additional narrative has been included to assist in defining the role of our strategic transport routes. A new policy has also been introduced that encourages the greening of our strategic corridors, reducing air and noise emissions.

Additional wording included in Part 2 of the post consultation draft and corresponding SPP narrative provide greater context to the policies within this SPP. Policy regarding advances in technology and innovation in the transport sector have also been incorporated into the document.

Policy already exists that manages conflict between various types of road infrastructure.

SPP 12 Energy

The provision of sustainable, reliable and affordable energy is essential in meeting the basic needs of communities and ensuring the long-term supply of key services across South Australia. Industries and business rely on energy for their viability while households rely on it daily to support their lives, health and comfort. The production of energy and associated infrastructure also contributes significantly to the state's economy.

What we heard

Respondents suggested this policy should explicitly seek to achieve reductions in greenhouse gas emissions through the development of renewable energy sources. Additional policy is also needed to encourage emerging technologies to integrate into the planning and development of townships and new developments, e.g. solar farm and batteries; energy exchange platforms; and biogas. Some sought policy to ensure that domestic roof-top solar installation was not be unduly impacted by overshadowing.

Respondents felt that the impacts from the ancillary facilities such as plant and equipment required to harness and deliver this energy, needs to be addressed. People also thought stricter policy was required to minimise the effects of windfarms.

How we have responded

The support of alternate and emerging sources of renewable energy has been integrated into an existing policy to facilitate energy supply at a local level, for example this would enable primary industry to establish a small-scale solar farm to provide their energy supply.

SPP 13 Coastal Environment

The South Australian coastal and marine environment has high intrinsic, aesthetic, social, environmental and economic values. It includes beaches, oceans, dune systems, tidal waters, wetlands and cliffs. The natural features of the coastal environment also provide vital habitat, contribute to our biodiversity and play an important role in protecting development and human occupation from flooding and erosion.

What we heard

Respondents considered that this policy provided a solid framework for seeking protection and enhancement of the coastal environment and ensuring development was not at risk of coastal hazards.

To improve this policy, respondents suggested it focus less on the development of coastal areas and focus instead on ways to sustainably and proactively enhance our coast.

This requires guidance on how development (including upstream development) could co-exist with sensitive coastal environments and minimise the impacts of stormwater.

Respondents also recommended this policy include expert information provided by relevant environmental disciplines on coastal ecological processes and how these could be used to protect the coast from the effects of development. It was also suggested that consideration should be given to stormwater flooding associated with high tides and storm surges, the water quality of the stormwater flows and the impacts on received waters.

Respondents identified the need to recognise the difference between infrequent and intense coastal hazards and incremental and more permanent ones, and the different mitigation responses to each.

Statements were made that developers should also be required to contribute to the upgrade of council stormwater infrastructure and to protect aquifers from contamination resulting from development activity.

It was suggested that a performance-based approach for land use assessment within water supply catchments would be a better way to ensure the protection of water quality and allow for innovation and emerging technologies in value-adding activities.

How we have responded

Policy content has been expanded to ensure the protection of a wider range of natural coastal assets e.g. mangroves, wetlands etc. The amendments also included incorporating a policy to protect infrastructure from coastal processes and hazards.

New policy relating to the marine environment have also been introduced to ensure its protection from new development.

SPP 14 Water Security and Quality

Water is one of South Australia's most valuable natural resources. Access to a safe and reliable water supply is essential to support our communities and our diverse economy. Our water dependent ecosystems also rely on access to water so that they can continue to provide cultural, aesthetic, amenity, recreational and tourism benefits. It is therefore vital that we continue to protect and plan for our water now and into the future.

What we heard

Respondents supported this policy in principle and considered it adequately covered the relevant intersects between orderly planning and the provision of adequate water supply, particularly the protection of key water supply catchments.

They suggested the policy should strengthen its design requirements to enable efficiency, water quality and drought resilience through better water use and reuse with reference to alternative water sources such as managed aquifer recharge and Water Sensitive Urban Design practice.

A discussion about environmental flow (particularly, but not limited to the River Murray) in support of creating healthy environments to provide surety that development in the upper reaches of catchment areas will not adversely impact downstream users. The downstream infrastructure required for water management, wastewater treatment, recycling and safe re-release back into the environment should also be addressed. It was suggested that further direction was required to address conflict in watershed areas.

Statements were made that developers should also be required to contribute to the upgrade of council stormwater infrastructure and to protect aquifers from contamination resulting from development activity.

It was suggested that a performance-based approach for land use assessment within water supply catchments would be a better way to ensure the protection of water quality and allow for innovation and emerging technologies in value-adding activities.

How we have responded

Policies have been strengthened to provide greater protection of our valuable water protection areas. In addition, policies have been introduced to encourage the provision of water infrastructure commensurate with expected population growth without compromising water quality.

SPP 15 Natural Hazards

Natural hazards are an integral part of the South Australian landscape and as we continue to grow and develop we need to plan for and mitigate risks from those hazards that have the potential to impact on people, property, infrastructure, our economy and the environment.

What we heard

To improve this policy, respondents suggested it should include a requirement that development, including infrastructure should not be located within hazard risk areas where possible or it should be designed and upgraded to accommodate such hazards in these areas. In rural and remote locations, development should be located in safer places with adequate protection zones, buffer zones and safe access.

Some sought further guidance to manage the risks and associated impacts of heavy rainfall events and bushfires. The need to address the impact that bushfire breaks have on natural character was also mentioned.

It was identified that the building code had standards to protect buildings and occupants from a range of risks.

How we have responded

Policy has been expanded to recognise extreme heat events, soil erosion and drought as natural hazards.

New policy has also been introduced to discourage development in areas that will necessitate the removal of native vegetation.

SPP 16 Emissions and Hazardous Activities

Protecting communities and the environment from exposure to industrial emissions and hazards and site contamination is fundamental to the creation of healthy cities and regions. At the same time, it is critical that South Australia's industrial and infrastructure capacity and employment levels are preserved.

What we heard

Respondents suggested this policy should include triggers that require land contamination investigations to be undertaken prior to rezoning for residential or other sensitive uses.

Emissions from a range of activities, such as agriculture, entertainment and transport (including airports), should also be recognised in this SPP. Additional policy to reduce the impacts of our strategic transport corridors has been introduced in SPP – 11 – Strategic Transport Infrastructure.

Existing policy has been strengthened to encourage greater protection of our communities and environment from the potential hazards caused by industrial and radiation emissions. In addition, policy has been introduced to encourage separation distances between high impact development and sensitive land uses.

General Comments

The Commission also received valuable insights and feedback from written submissions and a range of events during the engagement. While there was overall support for the SPPs, there were also several aspects of the document that required further consideration and subsequent refinement. In response, the SPPs were amended placing greater emphasis on a range of areas and a clear vision has been created to bring together the overall intent of the SPPs as a policy framework.

Many submissions also raised issues regarding the need for a state direction on two matters, social infrastructure and open space and the public realm especially in areas of infill and consolidation. Therefore the State Planning Commission recommends the commencement of investigations for the preparation of a specific SPP for each of these matters.

6 Evaluation of Engagement

To ensure the principles of the Community Engagement Charter (the Charter) are met, an evaluation of the engagement process for the SPPs occurred.

The Commission has established minimum mandatory performance indicators for this purpose and this is the first time that these indicators have been tested.

The Community was given the five minimum performance indicators about the engagement:

- through the YourSAy survey (around 62 responses per question),
- an evaluation survey provided to participants at the community panel (24 or 100% of surveys received)
- emailed to those that lodged a submission with the 'what we have heard report' (12 responses received).

Sally Jenkin, Lead of the Community Engagement Charter of the Department for Planning, Transport and Infrastructure prepared the evaluation.

The results are contained in the attachments and an assessment of against the Charter's principles are summarised below.

Summary of the Evaluation

The following is an assessment of the engagement against the five principles of the Charter.

The full results can be found in Attachment 2 to this report.

(1) Engagement is genuine

People had faith and confidence in the engagement process

The engagement met this principle through a targeted approach of a wide spectrum of stakeholders using a range of channels. The timeframe for consultation was extended from eight to ten weeks to ensure there was adequate time for the community to provide an informed comment.

The feedback received during the engagement process was valuable and a significant amount of amendments to the SPPs resulted. At all stages of engagement, feedback was able to be genuinely considered. Government agencies assisted in preparing the SPPs and other early engagement events with key stakeholders resulted in changes to the SPPs prior to consulting on the draft.

It is considered that the engagement process met this principle. Results indicated that 64% of respondents to the evaluation survey agreed that they felt they were genuinely engaged. Those that disagreed were concerned about specific topics in the SPPs rather than the engagement itself, or disagreed because they had yet to see any response to the engagement process.

Evaluation statement	Strongly disagree	Somewhat Disagree	Not sure	Somewhat Agree	Strongly agree
I feel the engagement genuinely sought my input to help shape the proposal (Principle 1)	10%	10%	12%	37%	27%

(2) Engagement is inclusive and respectful

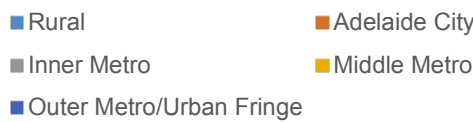
Affected and interested people had the opportunity to participate and be heard

The engagement targeted and reached known stakeholders that were interested and impacted by the SPPs. The YourSAy website and the Royal Adelaide Show event allowed DPTI to reach a much wider other South Australians who would not normally participate in the planning conversation.

Government agencies were involved early in the engagement process by assisting in preparing the draft SPPs. Further workshops held in the preparation stage resulted in changes to the SPPs prior to consulting on the drafts.

The engagement successfully reached the community groups identified in the Plan. A total of 47% of written submissions and 79% of YourSAy surveys were provided by the community (either general public, businesses and community groups). Receiving that level of response from the community on a State policy document is considered positive.

RESIDENTIAL LOCATION OF RESPONDENTS



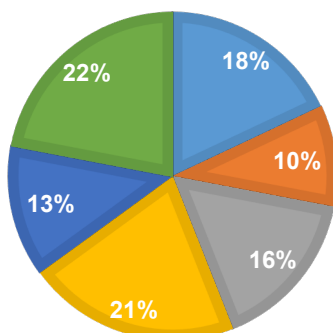
GROUP OF SUBMITTERS 141 WRITTEN SUBMISSIONS RECEIVED



From the YourSAY survey there was also a good share of responses between different age groupings and residential addressing indicating that the engagement reached all these groups.

AGE PROFILE OF SURVEY RESPONDENTS

■ 65+ ■ 18-24 ■ 24-34 ■ 35-44 ■ 45-54 ■ 55-64



The majority of respondents to the evaluation (73%) considered that the information provided on the SPPs were clear and understandable. A summary document was prepared to be easily understood by the community and practitioners. The information explained the role of the SPPs within the planning system and how the public can influence the high level strategic policy framework for the new system.

A total of 42% of respondents were confident 'somewhat agreed' that their views were heard during the engagement. Those who disagreed stated they needed to see a response to their comments before being able to answer with confidence. The question may need to be reviewed as one of the questions of evaluation or messaged to participants in a different way.

Evaluation statement	Strongly disagree	Somewhat Disagree	Not sure	Somewhat Agree	Strongly agree
I am confident my views were heard during the engagement	25%	25%	8%	42%	0%

(3) Engagement is fit for purpose

People were effectively engaged and satisfied with the process

People were clear about the proposed change and how it would affect them

The engagement offered a broad range of activities in a mix of ways, to reach a wide pool of stakeholders:

- The public was informed through a variety of media channels, to gain maximum reach- Your SAY, SA Planning Portal, DPTI social media, media release.
- An information booth at the show also reached members of the general community.
- Stakeholders known as interested and impact were directly notified by email.
- Those stakeholders significantly impacted had targeted workshops/information sessions
- A Community Panel workshopped the SPPs.
- Government agencies involved in preparing SPPS.

A high number of respondents (70%) considered that they had an adequate opportunity to be heard with 73% stating that they had sufficient information so that they could provide an informed view. Participants that provided negative comments, struggled with the role of SPPs providing high-level overarching policy which was difficult for some to relate to.

Evaluation statement	Strongly disagree	Somewhat Disagree	Not sure	Somewhat Agree	Strongly agree
I was given an adequate opportunity to be heard	7%	10%	14%	38%	32%
I was given sufficient information so that I could take an informed view	9%	7%	11%	47%	26%

(4) Engagement is informed and transparent

All relevant information was made available and people could access it

People understood how their views were considered, the reasons for the outcomes and the final decision that was made

To ensure that stakeholders were adequately informed and the process remained transparent:

- The information provided during consultation clearly articulated key matters, what, how participants can get involved and how feedback will be used.
- All submissions were acknowledged and advised of the next steps.
- All attendees at engagement events received a summary report at the conclusion of the event.
- A *What we had heard report* was emailed to all written submitters, provided on the YourSAy website and through the Planning Ahead newsletter.

A total of 72% of respondents felt informed about why they were being asked for their view and the way it would be considered. 76% of respondents understood how the SPPs may affect them and therefore it is considered that the engagement successfully met this principle.

Evaluation statement	Strongly disagree	Somewhat Disagree	Not sure	Somewhat Agree	Strongly agree
I felt informed about why I was being asked for my view, and the way it would be considered.	3%	3%	26%	41%	31%

(5) Engagement processes are reviewed and improved

The engagement was reviewed and improvements recommended

Feedback from engagement, both verbal and from evaluation survey, were considered throughout the engagement.

The engagement plan was amended during the early stages of engagement to respond to feedback regarding reaching the broader community. As a result the formal consultation period on the draft SPPs were extended from 8 weeks to 10 weeks. Department staff also attended meetings with Community Groups and Industry Groups on request.

7 Refer to the Minister for Planning

On 13 December 2018 the Commission approved the final draft SPPs and this Engagement Report for the Minister for Planning's decision making.

Attachments

- 1 Summary of Written Submissions
- 2 Evaluation Results

Attachment 1 - Summary of Written Submissions

State Planning Policies Summary of Written Submissions – Attachment 1 to the SPP Engagement Report

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
INTEGRATED PLANNING	15, 32, 47, 78, 137	Regional Development	Submitters identified that the policy was to 'urban centric' and did not provide enough guidance on development in regional areas.	Noted. Additional content will be included to ensure the relevance to regional areas is explicit.
	8, 2, 56, 131	Transport	<p>The submissions identified a need to plan for greater use of public transport system and their potential expansion.</p> <p>In addition some submitters stated that the SPPs were contradictory as they didn't take into consideration transport in outer suburbs.</p> <p>Furthermore some submitters indicated that development would be stifled without supporting public transport networks.</p> <p>Some submissions also stated a need to include policy relating to reducing impacts of high traffic road corridors through housing design and location.</p>	The SPPs are applicable across the whole state and as such the direction they provide (unless otherwise advised) are applicable to the state as a whole. Mitigation of the impacts of transport are dealt with
	8, 22, 28, 43, 45, 47, 68	Urban renewal and Regeneration	<p>There was support for urban renewal and regeneration to be strategically planned for.</p> <p>Submissions also outlined that the desire for continued renewal and regeneration of neighbourhoods should be tempered with</p>	The notion of urban renewal and regeneration being a blanket approach requires clarification. Consideration of all elements of an area is taken into account when planning for such projects.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			support for the preservation and enhancement of heritage places.	It is proposed to include wording to ensure that any such projects are strategically identified.
	9, 28, 43, 47, 54, 56, 68, 90	Car Parking	<p>The engagement process identified that there was concern regarding the use of local street networks for carparking and increases in additional infill and corridor development will exacerbate this issue.</p> <p>Submitters also stated there is no significant modal shift occurring and therefore no need for a reduction in carparking requirements.</p>	<p>The SPPs provide an opportunity to set a policy framework that will encourage greater use of our active travel networks thus reducing the reliance on private vehicle use. This in turn also negates the need or continued use of local street networks for on-street carparking.</p> <p>The policy will be strengthened by emphasising active travel options and ensuring that development is appropriately supported by such networks.</p>
	8, 28, 43, 76	Infrastructure Provision and Funding	<p>Several comments were received stating that the financing of infrastructure should be shared between developments and strategically identified.</p> <p>Submitters also stated that policy should consider the capacity of existing infrastructure.</p>	Agree – the capacity current and future of infrastructure (both physical and social) should be considered when planning for growth.
	9, 11, 14, 18, 54, 108	Ongoing protection of Valuable Primary Production Land through EFPA	Several submitters expressed the desire for the EFPA to be expanded to include areas outside of the Greater Adelaide region. Others stated that certain areas should be excluded from the EFPA for residential purposes creating a reduction for this type of development within the EFPA.	While the SPPs recognise the importance of the EFPA and provides guidance on its inclusion within the planning system, amending its boundaries to include or remove additional areas requires legislative review and process. This is outside the scope of the SPPs.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	9, 14, 28, 45, 47, 131	Managing Growth	<p>Several submitters stated that not all areas of the state should be designated as growth areas, particularly historic conservation areas or areas with high built form character.</p> <p>Respondents also provided commentary regarding the inclusion of population growth and its influence on the Integrated Planning SPPs and the SPPs overall. The ten year forecast also received commentary with many submitters stating that it should be longer and/or consistent with other targets set across government such as 15 or 20 years.</p> <p>Respondents also stated that land supply should also be given consideration with land capability analysis assessing infrastructure to support both residential development and growth in food production areas a consideration.</p> <p>Submissions also expressed support for the EFPA in managing residential encroachment onto valuable food production areas.</p>	<p>The identification of areas suitable for additional growth requires detailed investigations and analysis. A number of attributes are considered in this process including demographics, land constraints, infrastructure needs and capacity. The inclusion of heritage areas, heritage buildings and character are factors considered in this analysis, but don't necessary preclude growth from occurring. Where necessary or required, the protection of these heritage and character attributes is undertaken.</p> <p>The planning system has a role to play in regulating and controlling the physical change in our built environment. It responds to population growth and can influence where this growth can occur. It cannot however control population growth and when this can occur. The Integrated Planning SPP has been updated to reflect this influence and how the planning system will respond to population growth.</p>
	14, 17, 18, 108, 129	Character Preservation Districts	<p>Several submitters outlined that the Character Preservation Districts were omitted from the draft SPPS which may cause confusion due to their location which is outside of the EFPA.</p>	<p>Consideration to the importance and role of the Character Preservation Districts has been incorporated into the SPP in addition to further recognition in SPP 8 – Primary Industry.</p>
	3, 25, 43, 113	Character, Heritage and Culture	<p>Submissions detailed how the SPPs did not provide for the protection of historic conservation zones, contributory items, character areas and general heritage.</p>	<p>The SPPs provide a high level policy framework that gives direction for consideration and recognition in protecting and conserving heritage areas and places. It is not the role of the SPPs to</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<p>Many submitters stated that a policy is required describing local characteristics and the mechanisms to protect them.</p>	<p>specifically provide direction for the inclusion in planning zones, sub-zones or overlays.</p> <p>It is the role of Regional Plans to identify these specific sites and the level of protection they require and the role of the Planning and Design Code to apply the necessary planning rules to regulate this.</p>
	9, 19, 22, 43, 46, 47, 61, 62, 67, 68, 74	Housing Diversity and Density	<p>Respondents were concerned that the policies were too broad and did not recognise the valuable contribution of low density residential development to lifestyle, health and well-being. Other submissions outlined that the policies encouraging higher density in low-medium density areas were too arbitrary.</p> <p>There were also several submissions that stated it was not acceptable to encourage additional infill development in well serviced public transport areas as it will erode the character of those areas.</p> <p>Some submissions also included commentary on how medium-high density is not appropriate for areas of high amenity or heritage/historic conservation areas.</p>	<p>There has been additional contextual content included in the post-consultation draft of the SPPs. The Engagement process overall identified that the SPPs were lacking in overall evidence that has been collated to inform the policies. This section includes an overview of the relevance of housing diversity and density to our well-being, while also providing an analysis on what this means for our state.</p> <p>The notion of locating additional infill development in areas well serviced by public transport, is the very nature of integrated planning. In order for South Australia to remain a liveable, prosperous and sustainable state, we need to ensure that we are utilising our land and infrastructure efficiently.</p>
DESIGN QUALITY	2, 15, 31, 43, 45, 54, 78	Terminology	Several submissions expressed a need to define or make explicit what is meant by design quality,	Additional terms have been included in the glossary to ensure the terminology used is in the context of the document.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<p>complex development, thoughtful space and good design.</p> <p>Submissions also sought clarification on defining density in the South Australian context.</p>	
	8, 10, 11, 19, 22, 28, 33, 45, 47, 74, 75, 79, 126	Principles of Good Design	<p>Submissions were supportive of the inclusion of the Principles of Good Design. While some submissions suggested that the content required clarification and/or refinement. Additional wording was also suggested on how these can be implemented as policy.</p>	<p>The Principles of Good Design have been updated to ensure their relevance and appropriateness to the new planning system.</p>
	9, 16, 47, 76, 80, 131	Quality Design	<p>There was wide support for the application of quality design outcomes across the state rather than specified areas such as Adelaide City of specific types of development.</p> <p>Submissions also stated that the policies fail to balance efficiencies in assessment processes.</p>	<p>The SPPs do not deal with assessment processes per se but do provide a level of confidence in the ongoing support and use of the Design Review process.</p>
	10, 18, , 33, 45, 47, 78, 132	Design Review Process	<p>Some submissions suggested that there needed to be a specific criteria inserted into Development Plans for the Design Review Process with specific criteria required for to get approval.</p> <p>Other submissions noted that it would be beneficial to include local government in the early stages of Design Review. There was also suggestions made on clarifying when design considerations apply and when design review is required.</p>	<p>The SPPs do not deal with assessment processes per se but do provide a level of confidence in the ongoing support and use of the Design Review process.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<p>There were also suggestions that independent design review panels can provide value to the overall planning process.</p>	
	<p>8, 28, 33, 43, 45, 47, 66, 68, 75, 79, 85114, 132</p>	<p>Best Practice in Design</p>	<p>There was overwhelming support for listing various design practices, however some submissions stated that they should be flexible enough to enable well designed alternative solutions.</p> <p>Several submissions also noted the omission of Crime Prevention Through Environmental Design from the SPPs.</p> <p>Submitters also questioned the ability to achieve the principles of good design when basic design principles such as site consideration, acoustics and orientation are not listed. While others stated a need to strive to exceed standards and best practice guidelines.</p> <p>Submissions also stated the need for incorporating specific policies relating to Universal Design.</p>	<p>Reference to and the inclusion of known best practice in design approaches have been strengthened through additional introductory context information and referencing in the SPPs themselves.</p>
	<p>32, 45, 56, 74, 75, 108, 123</p>	<p>Smart Buildings, Building Efficiency and Sustainable Design</p>	<p>There was significant support for expanding policy to have more of a focus on energy efficiency and sustainability through design. There were also concerns raised on the mismatch between the policies and the narrative.</p>	<p>The notion of energy efficiency and sustainability through design has been emphasised in both SPP 2 – Design Quality and SPP 5 – Climate Change.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	28, 33, 56, 62, , 59, 61, 68, 76, 79, 120, 131	Open Space, Public Realm and Private Open Space	<p>There was overwhelming response on the need for a separate SPP for open space, public realm, streetscapes and private open space. Submitters also expressed that the policy would need to be clear on who provides and funds public open space.</p> <p>Commentary received also stated the importance of high quality public open space and its role in urban cooling, biodiversity, water quality and hazard mitigation.</p> <p>The inclusion of additional policy for green infrastructure was also raised due to the loss occurring as a result of infill development. Submitters also expressed a need to identify additional land for public open space.</p>	<p>Where appropriate policy has been strengthened to emphasise the importance of public open space and the role planning has to play in its provision and design.</p> <p>The facilitation of green infrastructure has also been strengthened and policy included in both SPP 2 – Design Quality and SPP 5 – Climate Change. In addition a policy has been added to SPP 11 – Strategic Transport Infrastructure to facilitate the greening of strategic transport corridors.</p> <p>It is also recommended that the viability of preparing a SPP specifically for Public Open Space and the Public Realm. DPTI will continue working with relevant agencies in developing this.</p>
	36, 47, 54, 76, 66, 74, 75	Quality of Life, Healthy by Design	<p>In addition to the comments on public open space and its benefits, there were several submissions requesting policy with a health focus and providing the connection between urban form and well-being.</p>	<p>The notion of quality of life, healthy neighbourhoods and well-being are captured throughout the SPPs. Importantly, additional wording in Part 2 provided detailed context to the policies.</p>
	47, 53, 67, 76, 80, 97	Local Heritage and Character	<p>Submitters expressed concern regarding the lack of policy pertaining to local heritage and character. Comments also stated that there is very little in the SPP regarding desired future character design, and the direct correlation between character and good design.</p>	<p>It is not the role of the SPPs to specifically provide direction for the application of planning zones, sub-zones or overlays for heritage buildings or areas.</p> <p>The undertaking of principles of good design should assist with the facilitation of better design outcomes in both and private and public realm.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	40, 53, 54, 60, 74, 75, 108, 126	General – design, interface, site orientation, air quality, acoustic privacy appearance and character	Several submissions outlined issues relating to general planning provision considerations with recommendations on possible policy solutions.	It is not the role of the SPPs to provide detail and performance based policy solutions.
ADAPTIVE REUSE	3, 21, 97, 132	Sustainability, Energy Efficiency	Submitters identified that the policies do not refer to the related embodied carbon benefits in the adaptive re-use of existing buildings and structures nor the associated waste minimisation benefits. Likewise green star measures should be adopted to ensure successful outcomes of under-performing buildings.	Consideration of the embodied carbon benefits of adaptive reuse is included in the supporting narrative. The planning system can only recognise the benefits and establish policies to facilitate adaptive reuse.
	8, 9, 22, 32, 33, 40, 43, 47, 56, 57, 61, 87, 132	Local and State Heritage	<p>Multiple submissions outlined the omission of references to local and state heritage places and buildings in Historic Conservation areas. Commentary was also provided on the need to ensure that the reuse of heritage buildings needs to be carefully balanced against the flexibility required for reuse.</p> <p>While some submissions expressed support for reuse of heritage buildings others requested a detailed heritage framework or hierarchy.</p>	<p>The adaptive reuse of buildings does not only refer to those buildings with a local or state heritage listing. While it is important for the planning system to recognise and facilitate the protection of the heritage value through the SPPs, it is not the SPPs role to explicitly state which buildings should and should not be reused.</p> <p>The inclusion of a heritage framework or hierarchy in the SPPs is not appropriate. The</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<p>More detail was also sought on how heritage buildings will be repurposed and that any reuse should not be to the detriment of the visible heritage characteristics, with some suggesting the parameters be included to guide redevelopment.</p> <p>The prioritisation of vacant heritage and non-heritage buildings should be considered over those occupied and located in historic conservation zones or under a formal listing.</p>	<p>heritage listing of local or state places is hierarchical in nature.</p> <p>The Planning and Design Code will provide development parameters in the form of performance based policy and will identify the heritage status of a place or building.</p>
	8, 11, 14, 28, 33, 43, 45, 47, 53, 56, 74, 75	Incentives and Dispensations	<p>While some submissions expressed strong objection to incentivising or providing dispensations for the reuse of heritage buildings, others supported the notion in principle subject to the unnecessary dispensation of prescriptive requirements such as setbacks, building heights etc. Clarity was also sought on what the incentives were, who funds them and who is accountable.</p>	<p>Any policy dispensations would be identified in the context of the location of the proposed development. It is not the SPPs role to define what the policy dispensations area.</p>
	33, 38, 47, 68	Benchmarking within the Building Code	<p>There were several concerns expressed relating to prescriptive requirements under the Building Code or any Ministers Specifications (<i>carparking, safety, health and amenity of buildings</i>) and the encouragement of adaptive reuse of older buildings. Submissions also stated that no technical requirements should be developed outside of intergovernmental agreements and any building upgrades should be included into the NCC BCA.</p>	<p>Noted. There will be no conflict with NCC or BCA.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	33, 40, 43, 53, 57, 76, 80	Diversification of Adaptive Reuse	<p>There was support from submitters for the inclusion of a broader range and era of buildings to be identified as potential candidates for adaptive reuse and the consideration of creating spaces for creative communities or temporary uses.</p> <p>In doing this, consideration should also be given to historical land uses.</p>	In the context of the SPP and the broader planning system, adaptive reuse can apply to any building which is underperforming or underutilised. There are no restrictions as to which era a building can be used for adaptive reuse.
	43, 47, 53, 57, 61, 68, 76, 80	External Impacts	The external impacts of adaptive reuse on surrounding buildings, neighbourhoods and existing densities was raised by several submitters. In order to mitigate this, it was suggested that criteria be created to mitigate any decline in building and planning standards, discourage intentional vacancies and that impacts on existing facilities and infrastructure should be considered.	<p>The Planning and Design Code will guide and provide parameters as to how to manage the external impacts of buildings being repurposed.</p> <p>Design Standards (a new element in the planning system) can also provide additional requirements and standards to ensure that external impacts are mitigated.</p>
BIODIVERSITY	8, 9, 43, 47, 48, 133	Development Impact	Clarification was sought from submitters regarding the reconciliation of biodiversity with urban density and there was strong support for ongoing protection of biodiversity from development.	It has been recognised that policy relating to the protection of biodiversity from the impacts of development be strengthened. Therefore additional wording has been included to recognise the importance of such mitigation.
	11, 16, 17, 32, 43, 45, 47, 56, 75, 77, 80, 86,	Biodiversity Value	Engagement participants saw the SPPs as an opportunity to strengthen the role of biodiversity in the planning system and increase biodiversity value through development outcomes.	Policy has been rewritten to ensure that it explicitly recognises the importance of biodiversity value and that development should be appropriately scaled so that it can coexist

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	108, 123, 132, 133		<p>It was also noted that the SPPs provided a mechanism to establish a policy framework that encourages urban biodiversity on vacant sites and acknowledge the role modified landscapes play in our environment.</p> <p>While there was strong support for this policy, some submissions identified a policy deficit in recognising the impact of infill development in smaller urban settings. It was also suggested that reference be made to efficient green star buildings and their contribution to biodiversity.</p> <p>It was also suggested that biodiversity should be enhanced through good design.</p>	<p>within or adjacent to areas of high biodiversity values. In addition further policies have been introduced recognising the importance of biodiversity in urban areas and the role additional green infrastructure in enhancing this.</p> <p>The contribution of green star ratings and notion of sustainable building design is captured in SPP 5 – Climate Change.</p>
	22, 33, 43, 45, 47, 68 59, 61, 68, 74, 75, 77, 80, 86, 133	Increasing Urban Green Cover	Some submissions identified a variance between the targets in Part 4 of the SPP engagement draft and the policies relating to increasing green infrastructure. There were also concerns as to the application of the target including how it will be achieved.	The overwhelming support for policy encouraging increases in green cover has led to additional policy inclusions in both SPP 4 – Biodiversity, SPP 5 – Climate Change, SPP 11 – Strategic Transport Infrastructure. The justification for such wide coverage is that green cover plays a very different role in each of these SPPs.
	47, 56, 59, 61, 63, 68, 75, 76, 77,	Ecosystems	There was strong commentary on biodiversity and its context in an urban setting. Several submissions expressed concern over the loss of urban biodiversity due to infill development, increasing site coverage in residential development and reduction in private open space.	Increasing our biodiversity through additional green cover and ensuring our waterways are healthy are two key aspects in protecting and enhancing our ecosystems. Policy to the effect is captured in the additional policy regarding green cover, SPP 13 – Coastal Environment and 14 – Water Security and Quality.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	45, 48, 68, 133	Cumulative Impacts	Submissions identified that policy was silent on the cumulative impacts of the loss of biodiversity and the impact this has on various ecosystems.	Included in narrative. No additional policy included.
	48, 56, 76, 77, 80, 86, 108, 131, 133	Landscape scale connectivity, corridors and open space	Submissions identified the need for policy that encourages landscape scale connectivity and opportunities for migration and habitat creation. Concern was also expressed over the lack of strategy and coordination of biodiversity in open space.	Increasing our biodiversity (including for habitat and migration) through additional green cover and ensuring our waterways are healthy are two key aspects in protecting and enhancing our ecosystems. Policy to the effect is captured in the additional policy regarding green cover, SPP 13 – Coastal Environment and 14 – Water Security and Quality.
CLIMATE CHANGE	15, 16, 17, 22, 40, 47, 43, 80, 87, 127	Urban Centric	<p>The policies were considered too urban centric and not applicable to the broader state. Several submitters expressed concern regarding the lack of recognition of the scale of climate change impacts across the state (state, regional or local).</p> <p>There was also concern regarding the impacts of climate change on our food and primary production areas, fisheries and arable lands and the lack of adaption measures within the policy – particularly as there is evidence of a shift in the occurrences of notable climate change impacts.</p>	<p>The application of these policies is at a state wide level and is not considered to be urban centric. While it is acknowledged that the scale of climate change differs across the state, the policy is broad enough to allow for such differences. It is also understood that at a local level, councils have been preparing Climate Adaption Plans which provide detail on localised adaption and mitigation strategies.</p> <p>The planning system’s role in mitigating or facilitating the adaptation of climate change for our primary production areas is outlined in SPP 8 – Primary Industry. While it doesn’t provide specific solutions, it does endeavour to encourage greater use of renewable energy,</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
				innovation in technology and diversification of industry.
	9, 27, 76, 62, 86, 87	Science and Analysis	Several submissions stated support for the use of science and analysis used to understand localised impacts and set adaptation responses. This approach can also contribute to ongoing monitoring and establishing baselines for targets.	The use of science to benchmark and establish evidence is necessary in order to understand local impacts and establish mitigation and adaptation strategies. While the SPPs cannot provide solutions to localised climate change impacts, it does set the policy framework to enable those preparing regional plans to better understand how climate change affects their local areas and how best to mitigate these.
	10, 22, 28, 31, 36, 41, 43, 45, 47, 54, 61, 66, 68, 75, 76, 79, 86, 86, 123	Climate Smart Development/ Carbon Efficient Living and Embodied Energy	<p>There was a great deal of commentary and response regarding the impacts of climate change and mitigating this through construction and ongoing building maintenance – both in the commercial and domestic sectors.</p> <p>There was strong support for policy that encourages climate smart development and designing buildings to reduce reliance on water, energy, waste and unsustainable building materials at both the construction phase and throughout the life of the building. It was also suggested to create policy that recognised the embodied energy of existing buildings.</p> <p>There was also strong support for carbon efficient living environments and the creation of more compact, walkable neighbourhoods.</p>	The SPP includes policies to drive this approach through other planning instruments. While the policy has been refined, its intent remains the same.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	63, 75, 79	Incentive Scheme	There were some suggestions for consideration of an incentives scheme to encourage climate smart buildings and better provision and retention of open space.	Noted. There were no changes to the policy to encourage incentive schemes for climate change adaptation and mitigation.
	76, 81, 132	Carbon Neutrality	There were some suggestions from submitters to include policy relating to reducing greenhouse gas emissions and carbon storage. It was also suggested that Green Star (or similar) should be used in conjunction with KPI's to guide new development.	SPP 4 – Biodiversity addresses carbon storage. The policy content within this SPP already includes direction for climate smart development.
	76, 86	Risk Assessment	Submissions put forward that a risk assessment approach be adopted to manage risk of the impacts of climate change.	While the SPPs cannot provide solutions to localised climate change impacts or risks, it does set the policy framework to enable those preparing regional plans to better understand how climate change affects their local areas and how best to mitigate these.
	140	Compulsory energy use	The compulsory requirement for connections and usage of specific energy resources removes consumer choice and can create unnecessary, long term housing costs.	Noted. The SPP does not and cannot specify energy sources for use on a domestic scale.
HOUSING SUPPLY and DIVERSITY	9, 16, 56, 58, 62, 63, 66, 80, 109, 126, 131, 132,	Affordable Housing	There was very strong support for the ongoing provision of affordable housing options across the state. There was also acknowledgement that in order to be successful, affordable housing product needs to be diverse and integrated with other housing types.	Noted. The SPPs cannot provide specific direction for where the development affordable housing can occur. It does however, give direction for its inclusion as a housing option across the state and recognises the role the planning system has to play in delivering this.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<p>Incentivising affordable housing was also widely supported, however some submitters stated that such incentives should not be at the detriment of good design outcomes (such as street appeal). Good Design outcomes should be included in the delivery of affordable housing product and not overlooked when seeking to provide planning incentives.</p> <p>It was also stated that Affordable Housing needs to be defined and mechanisms for its delivery improved in the planning system with 15% provision through new development included.</p>	<p>The 15% Affordable Housing Target has been included in the SPP, ensuring that it is a key consideration throughout the planning system.</p>
	<p>19, 33, 45, 54, 56, 68, 109, 131</p>	<p>Incentives</p>	<p>There was general support for a planning based incentive scheme for diverse housing, although most commentary related to the provision of affordable housing product.</p> <p>As with comments on affordable housing, submissions stated that the use of an incentive scheme should not be to the detriment of other planning outcomes such as carparking rates and buildings heights.</p>	<p>The delivery of affordable housing requires a number of supports for its delivery. Incentivising the provision of affordable housing through the planning system is only one mechanism for delivery. To incentivise the delivery of affordable housing through the planning system, the mechanism would be policy dispensations or similar. While many submitters expressed concern, the dispensations would be commensurate with the expectations and planning policy set for a particular area.</p>
	<p>9, 16, 19, 32, 56, 57, 78, 96</p>	<p>Residential Growth in Regions</p>	<p>Several submissions expressed concern over the lack of policy regarding residential growth in regional areas and centres, while others supported the policy within this SPP as it promoted centric growth of regional centres.</p>	<p>The SPP have been updated to provide more relevance to regional areas, townships and other settlements.</p> <p>An additional policy for rural living has also been incorporated to ensure that the delivery of housing reduces impact on the expansion of</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			It was suggested by several submitters that specific policy to drive growth in regional areas is required and that this should include density targets. Other policy suggestions included those for rural living, shack areas and other types of settlements.	existing townships and does not fragment valuable primary production land.
	10, 11, 19, 33, 43, 45, 47, 56, 57, 66, 68, 74, 75, 76, 87	Housing Diversity and Density	<p>Submissions expressed overall support for this policy and the desire for better connected and serviced diverse housing choices. There was also wider support for broader distribution of housing diversity and that it should not be restricted to the City of Adelaide or specific residential zones.</p> <p>Some submissions stated that there was too much emphasis on aged care and small lot housing and that the policy should be expanded to include other types of housing such as laneway housing, dependant accommodation and accessory housing (fonzie flats).</p>	<p>The intent of both SPP 1 – Integrated Planning, SPP 2 – Design Quality and SPP 6 – Housing Supply and Diversity is to encourage well designed, diverse housing choices that are well connected. Existing policy and those introduced as a result of the engagement process ensure that our infill as well as our green/brownfield developments take these particular polices into consideration when planning for future development. At the Regional Plan level, investigations and detailed analysis will identify where these opportunities and establish a means for its sequential delivery.</p> <p>The policy has also been refined to ensure the diverse range of housing choices is flexible enough to encourage a varied and expansive range of housing types across the state.</p>
	19, 21, 58, 66	Housing Supply	There were several submissions expressing that housing supply should respond to social and cultural needs.	Policy has been expanded to include reference to social and cultural needs.
	15, 28, 57, 131	Land Supply	Several submitters noted that a land release program should align with other state	Noted.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			government strategic documents such as the Infrastructure SA Plan.	
	15, 33, 60, 66, 68, 75, 139	Healthy Neighbourhoods	<p>There was overwhelming support for the facilitation and encouragement of healthier neighbourhoods and well-designed open spaces. It was also suggested that there needs to be open space targets in the new planning system.</p> <p>Submissions also suggested a separate SPP for open space be considered.</p>	The intent and the premise of the SPPs is to create healthier more walkable neighbourhoods. Many submissions expressed concern regarding the lack of content with the SPP document on this topic. In response to this, there has been additional narrative content (refer Part 2 of post engagement draft of the SPPs) which provides greater detail on healthy neighbourhoods in the context of South Australia. The SPP then provides the mechanism for its delivery.
	28, 57, 74, 117	Mixed Use Development	While the mutual benefits of mixed use development was recognised, there were several comments regarding the consideration of good design outcomes when planning for and developing this type of development. It was also suggested that a position needs to be reached for a more orderly approach to this.	SPP 2 – Design Quality gives direction on the consideration of design when delivering mixed use development particularly in renewal precincts.
	32, 43, 45, 47, 56, 60, 67, 75	Heritage and Character	Submissions identified the omission of reference to heritage and character	Noted. This topic is covered in SPP 7 - Cultural Heritage.
	45, 60, 61, 67, 68, 74, 76, 113	Permissive Policy	There were several concerns raised about permissive policy and what this means in the context of the new planning system.	Noted.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	45, 56, 57	Adaptive Reuse	Submitters saw the SPPs as an opportunity to introduce policy that advances innovation and transformation of residential accommodation.	The adaptive reuse of our built form is included in SPP – 3 Adaptive Reuse.
	57, 131	Population Growth	Submitters identified that the SPP needs to encourage, plan and facilitate population growth and that each SPP should incorporate at least some element of planning for population and demographic changes.	The policy has been refined and updated throughout the document to provide response to the notion of how the planning system can influence where population growth can occur. SPP 1 – Integrated Planning has also been amended to reflect this aspiration.
CULTURAL HERITAGE	5, 8, 30, 32, 40, 43, 46, 47, 50, 53, 56, 61, 63, 67, 68, 73, 74, 75, 76, 97, 106, 113, 115, 123, 126, 135,	Local and State Heritage, Built Form Heritage	<p>There was overwhelming concern that this SPP was not adequate enough to conserve, protect and recognise formal heritage listed places and buildings, historic conservation zones or contributory items. Submissions outlined that the SPP was vague, unclear and underdeveloped.</p> <p>Submissions also stated that the SPP was shorter than others and therefore was of less importance.</p> <p>It was also suggested that the SPP should refer to the ICOMOS Burra Charter.</p>	<p>This policy has been refined to provide greater context to the policies.</p> <p>An additional policy has been included to reiterate the importance of recognising the heritage places processes.</p> <p>Wording has also been added regarding the ICOMOS Charter for Places of Cultural Significance.</p> <p>The SPPs provide a high level policy framework that gives direction for consideration and recognition in protecting and conserving heritage areas and places. It is not the role of the SPPs to specifically provide direction for the inclusion in planning zones, sub-zones or overlays.</p> <p>It is the role of Regional Plans to identify these specific sites and the level of protection they require and the role of the Planning and Design</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
				Code to apply the necessary planning rules to regulate this.
	47, 55, 59, 62, 66, 76, 106	Aboriginal culture	<p>Submissions stated that the SPP could be more explicit regarding the 39 traditional language groups, lands and sites.</p> <p>It was also suggested that the SPP needs to strengthen the recognition of Kaurna and indigenous associations and connections to land.</p>	The SPPs provide a high level policy framework that gives direction for consideration throughout other planning instruments.
	49, 56, 62	Cultural History	Several submissions outlined that the SPP does not adequately reflect the range of cultural influences (including migrant influence) of South Australia.	Contextual information and additional narrative has been included in Part 2 and also in this SPP to provide more context to our history, settlement patterns and influences.
PRIMARY INDUSTRY	4, 14, 17, 54, 109,	Land Use Conflicts	Submitters emphasises that Issues surrounding land use conflicts (such as spray drift, between primary producers, industry and sensitive land uses and requested that this requires resolution and that the SPP does not address this.	While there was The SPPs cannot provide local solutions to the impacts of specific interface issues in primary production areas.
	16, 76, 80, 86, 87	Biodiversity/W atershed	Submissions stated that the SPP needs to establish greater efficiencies in established agricultural lands before pursuing new land in areas with high biodiversity value. Likewise other submissions commented on the need to	SPP 4 – Biodiversity provides additional direction and control to ensure that biodiversity value is not lost to development – this extends to use of land for primary production. Furthermore SPP 14 – Water Security and Quality provided additional policy direction for the use, reuse of water. It also recognises that our water resources should not

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			protect the water supply and watershed from overuse from primary industries.	be exploited and that other water resources should be considered.
	17, 62, 75, 109, 127	Innovative Practices	<p>Submitters expressed a need for flexibility in future planning policies to incorporate changes in agricultural land use as a result of climate change and intensification.</p> <p>Innovative farming practices should be encouraged in addition to enabling more sustainability such as local solar farms and water capture.</p>	<p>Advances in technology and processes has seen significant efficiency increased in primary industry. This is supported by the SPPs which therefore encourages a greater level of flexibility in performance based planning policy included in the Planning and Design Code.</p> <p>The scale of solutions to support primary industry adapt to climate change vary and as such additional policy has been included in SPP 12 – Energy which encourages small scale advances in energy provision (such as localised solar farming) to support primary industry to be more sustainable.</p>
	32, 47, 48, 78, 87, 88, 104	Diversification	<p>There was support for the encouragement of the diversification of uses within primary industries and the allowance for the expansion of agricultural industry to provide provision for retail sales of local produce, associated tourism etc</p> <p>Greater flexibility in planning policy was also supported to allow for the expansion of agricultural endeavours and innovation.</p>	The SPPs recognise the importance of primary industry being able to diversify business either on site or other locations as such contains policy to this effect. It also acknowledges the importance of a flexible planning system to facilitate diversification.
	27, 47, 78, 87, 96, 102, 104, 109,	Protection of Primary Production Land, EFPA	There was considerable support from the submissions for the ongoing protection of primary production land and the EFPA. There was also commentary on expanding the EFPA	The establishment of the EFPA and Character Preservation Districts has gained significant support, both in the primary industry sector and the various communities that are within proximity

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	121, 127, 128, 129	and Right to Farm	<p>for greater protection of primary production areas outside of Greater Adelaide.</p> <p>Suggestions also included ensuring that identified agricultural areas and land are not impeded for farming activities as a result of proximity to non-farming uses.</p>	to or adjoin these areas. The SPPs endeavour to reiterate the importance of these areas.
	54, 76, 129	Character Preservation Districts	Submitters queried the omission of the Character Preservation Districts.	Reference to the CPD has been incorporated into the policy.
EMPLOYMENT LANDS	9, 15, 22, 33, 36, 43, 47, 56, 57, 63, 68, 71, 74, 75, 76, 87, 95, 108, 109, 111,	Supply, Growth and Protection of Employment Land	<p>Submissions expressed a need to strategically locate employment land to reduce the need for commuting and access to services.</p> <p>They also stated that there needs to be greater emphasis on employment land beyond the City and inner metropolitan areas and that employment hubs (tourism, technology, innovation, education, science and defence) also need to be acknowledged and encouraged through the policy.</p> <p>There was also commentary on encouraging diverse land uses in multiple areas so that businesses are located close to the population they serve – this is particularly important in regional areas where secondary centres can create additional but mostly unnecessary requirements for infrastructure and services.</p>	<p>The notion of creating accessible employment land is the intent of the SPP which is further supported by policy in SPP 1 – Integrated Planning and SPP 11 – Strategic Transport Infrastructure.</p> <p>The recognition of our key drivers (education, defence, science etc) of employment across the state has been incorporated into policy content. This is further supported by additional wording added to the corresponding narrative.</p> <p>Content in Part 2 also provides broader evidence of this.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	22, 28, 33, 43, 47, 68, 47, 54, 68, 87	Managing Interface Issues and Impacts	<p>Submissions noted that it is important to encourage appropriate buffers between sensitive land uses and high impacting development.</p> <p>Submissions also noted that policy should have regard to the impacts of new uses, especially if they are greater than previous uses.</p>	Noted.
	9, 11, 15, 16, 111, 117, 136	Retail Sector and Centres Hierarchy	<p>Several submissions outlined that the policy should encourage land for retail and commercial uses is provided in clusters to negate the need for private vehicle use, additional services and infrastructure.</p> <p>It was also expressed that the SPP should reinforce a centres hierarchy, particularly due to the desire to encourage more mixed use development which is generally located within activity centres. Activity centres provide a role in guiding development and investment in retail/services and infrastructure.</p>	The narrative in the SPP has been amended to provide greater insight into activity centres and their contribution to the retail sector. A new policy regarding the protection of higher order centres has been incorporated into the policy.
	111, 117, 136	Retail Competitiveness	Some submissions also questioned the role of planning in creating a competitive retail sector.	Land use planning can only influence where retail land uses can occur – it cannot control it nor can it influence market demand.
	108	Waste Landfills	While the narrative discusses waste landfills there is no corresponding principle.	Noted.

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KEY RESOURCES	11, 96,	Protection of Mineral Resources	Respondents indicated that there were concerns that the policy intended to protect mineral resources from the encroachment of compatible uses.	Key resource sites require a level of protection as they provide assets that drive our economy and support the growth and development of our community.
	54, 75, 80, 87, 96	Protection of Agricultural Land	Submissions noted that the SPP needs to recognise that high quality agricultural land, including the food bowl needs to be protected from mining and extractive industry.	Both SPP 4 – Biodiversity and SPP 8 – Primary Industry provide sufficient policy to protect valuable primary production land from encroachment of inappropriate land uses.
	47, 62, 75, 87, 108, , 132, 142	Environmental Sustainability	Submissions identified a need to include the rehabilitation including that for biodiversity and mining accommodation following the decommissioning of key resource areas. They also stated that there should be recognition in the policy for renewable energy as a key resource.	Rehabilitation of land post mining is dealt with by the Mining Act. The planning system should be focused on facilitating sequential land use. Renewable energy is covered in SPP 12 – Energy.
STRATEGIC TRANSPORT INFRASTRUCTURE	2, 33, 49, 56, 85	Innovation in Technology	Submissions identified the need to specify how the planning system will support innovation in new transport related technology such as autonomous vehicles and digital wayfinding while ensuring that any unintentional negative externalities are managed.	Additional wording in Part 2 and corresponding SPP narrative provide greater context to the policies. Policies regarding advances in technology and innovation in the transport sector have been included.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	28, 29, 32, 56, 70	Airports	Submissions identified that policy was silent on airports. It was also suggested that the National Airport Safety Framework Guidelines be considered as policy in addition to further protection of our airports.	Airports and associated infrastructure are captured within the policy content as a valuable asset to the state and its protection from incompatible uses is required. In addition the policy recognises the importance of expansion of compatible development should be encouraged.
	11, 32, 47, 54, 68, 70, 74, 107	Strategic Roads	Submissions identified that the policy required strengthening around managing the conflict between strategic transport roads. It was also suggested that policy should refer to road widening intent to make it explicit and to make the distinction between high transport routes and heavy transport routes.	The management of conflict between strategic roads is regarded in the SPP and managing encroachment of non-compatible uses. Road widening required spatial application and therefore it is the role of the regional plans to apply this.
	22, 74	Place and Link	Responses indicated that The policy doesn't recognise whole 'link and place' method of integrating and balancing transport and land use, Therefore it was suggested that a better balanced priority between 'place' and link' is required. E.g. there are existing and desired mixed use land use corridors and centres.	A new policy specifying the importance of link and place has been included.
	16, 33, 47, 66, 75, 76, 87	Active Travel/Neighbourhoods	Submissions identified a greater need for more active travel infrastructure, particularly for commuters and to ensure our neighbourhoods support active travel choices. It was also identified that there needs to be more emphasis on place function as opposed to	Additional wording in Part 2 and the corresponding SPP narrative provide greater context in relation to active travel and healthy neighbourhoods. SPP 1- Integrated Planning further supports this.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			transport, ensuring well designed and functional neighbourhoods.	
	28, 43, 56, 96, 132	Transport integration	<p>Some submissions stated that the policy <i>assumed</i> integration transport but did not provide priority when existing areas can influence the location of transport.</p> <p>The importance of the loss of strategic transport infrastructure such as the loss of rail can have significant impacts on the community in terms of movement and good provision but also can create additional road movements which could lead to a reduction in safety – particularly in smaller settlements.</p> <p>It was also suggested that policy should include consideration of multi-model transport and associated infrastructure when planning for integrated transport networks.</p>	There is support through multiple SPPs for the protection and investment in transport infrastructure. SPP 1 – Integrated Planning emphasises the need to ensure our transport infrastructure is integrated and located where it is most needed. The SPPs do not provide specific spatial context as it's implied they apply across the state. In addition it is recognised that impacts of strategic transport infrastructure needs to be considered.
	40, 56, 107, 108, 126	Transport Expansion and Protection	<p>There was general consensus about the protection of our key transport infrastructure, however further policy was required to guide expansion. Clarity is also sought on whether transport planning would occur outside of land use planning.</p> <p>It was also suggested that a specific policy be prepared to capture the importance of future sea port facilities, providing certainty for infrastructure investment and environment protection.</p>	<p>There are existing policies that infer to the protection of strategic transport infrastructure while mitigating the impacts of this on the community.</p> <p>Transport planning will occur outside of land use planning, although the new planning system provides an opportunity to forge better integration of these two sectors.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			There were also requests to provide assurance that any expansion of transport infrastructure will not compromise the parklands.	<p>The notion of a policy for strategic ports has merit, however there was not wide support for initiating this endeavour.</p> <p>The SPPs do not drive investment decisions or decisions on route selection for capital investment.</p>
	43, 49, 62, 66, 108	Emissions	There was wide support to better manage the impacts of strategic transport/freight routes particularly where mixed use and other development is encouraged along key corridors. A more strategic approach to this is also required.	Additional wording in the policy to manage air emissions has been included.
	66, 76	Social Infrastructure	The policy is silent on the provision of social infrastructure.	The intent of this policy is to provide direction for transport infrastructure. The notion of a dedicated policy on Social Infrastructure has merit, however the state direction for this is covered by SPP 1, 2 and 6.
	9, 33	Carbon Neutrality	The policy needs to be strengthened by reference to encouraging design and implementation of strategic transport infrastructure and service provision which encourages and / or contributes to reducing greenhouse gas emissions.	The provision of transport services is not within the scope of the SPPs. SPP 2 – Design Quality is applicable to all development, including that for transport infrastructure.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	11	Offset schemes	The provision of transport infrastructure could be supported by an off-set scheme.	Noted. The PDI Act 2016 introduces a broad approach to off-set schemes. Investigations are currently occurring in relation to how these will be used and the governance arrangements this will entail.
ENERGY	9, 27, 47, 87	Technology	Submissions identified the need for the planning system to encourage emerging technologies and recognise these can have significant environmental outcomes.	There is policy within the SPP that encourages climate smart buildings and innovation in sustainable development.
	12, 13, 18, 88	Gas Pipelines	There was strong support regarding the future provision of gas pipelines and their recognition of as key energy infrastructure. In addition submissions also stated that development needs to be cognisant on its impacts on such infrastructure.	Noted. Policy has been expanded to recognise the importance of this infrastructure.
	16, 27, 33, 40, 43, 47, 56, 75, 79, 80, 108, 128	Renewable Energy	<p>The policy would benefit from a reference to the following:</p> <ul style="list-style-type: none"> Ensuring water and energy efficient urban and building design. <p>P&D Code overlays to identify energy distribution networks and infrastructure needed to support development.</p> <p>Oppose this policy as it inaccurately implies that renewable energy adversely affects stable and</p>	<p>This topic is covered widely through multiple SPPs including SPP 2 – Design Quality, SPP 5 – Climate Change and SPP 14 – Water Security and Quality.</p> <p>The SPPs also do not provide specific direction for content in Regional Plans nor the Planning and Design Code – they provide a high level strategic policy framework. Investigations into the spatial application of the SPPs is conducted at the Regional Planning level.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<p>continuous energy supply and amenity of regional communities.</p> <p>The ongoing provisions of sustainable, reliant and affordable energy is pertinent to the ongoing viability of primary industries.</p>	The policy has also been expanded to ensure that primary industry can take advantage of alternate energy resources, whether this is on site or through other arrangements.
	98, 112, 64, 96, 142	Wind Farms	Windfarms require stricter policy to guide impacts and better independent governance. Submissions also stated that the amenity of adjoining properties should be upheld and protected.	Noted.
	131	Energy Provision	<p>How will drafters of regional plans know what infrastructure is required for future energy needs are</p> <p>Framework which enables a range in energy systems to enable choice</p>	The SPPs also do not provide specific direction for content in Regional Plans nor the Planning and Design Code – they provide a high level strategic policy framework. Decisions on the spatial application of SPPs and the investigations/evidence gathering to support key decisions at a regional and/or local level is conducted when preparing Regional Plans. The process which is undertaken is up to those conducting this research.
COASTAL ENVIRONMENT	2, 17	Carbon sequestration	Submissions identified the need to provide greater recognition for carbon sequestration requires addition. It was suggested that policy and overlays should seek to protect high carbon sink areas such as saltmarshes and mangroves	A new policy has been added to recognise the values of carbon sequestration.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			and restored landscapes that can offer high carbon sequestration values.	
	7, 17, 22, 28, 33, 40, 47, 54, 6, 132, 123, 81, 76, 15, 16, 47, 56, 62, 73,	Balancing development and the protection of the Coastal environment.	<p>Submission sought that the policy didn't seek to protect development but should be able to adapt to coastal hazard.</p> <p>Submissions identified that additional expert guidance is required on how development can coexist with sensitive coastal environments and one mentioned the importance of the ongoing role of the Coast Protection Board.</p>	<p>Policy has been amend to change to being able to adapt to coastal hazards.</p> <p>Noted – the coast is a contested space with many competing demands. Identification of areas ranging from conservation only and hazard avoidance to areas for sustainable development is of significant importance. Regional Plans and relevant expertise for government departments will have a role to play in getting this right.</p>
		<p>Hierarchy of avoidance, adaption, protection to be adopted.</p> <p>Protecting the coastal environment, habitats, fauna and flora</p>	<p>Submissions recommend that policies:</p> <ul style="list-style-type: none"> • Be reworded to ensure development is not at risk from current and future coastal hazards consistent with hierarchy of avoid, accommodate and adapt • Be amended to remove 'ensuring'. <i>Ensuring development</i> is not at risk from hazards is not a realistic expectation/outcome. • Recognises the difference between infrequent and intense coastal hazards and incremental and more permanent and the different mitigation responses. • Recognise the protection of a range of specific coastal environments such as mangroves, dunes, cliffs, native vegetation, estuaries, marine protection areas, wetlands, marine environment, living creatures 	<p>Policy has been reword to accommodate the suggestions, replacing ensure with minimise and adding a broader range of hazards and sensitive environments. Amendments have also been made to reflect the hierarchy of avoid, accommodate and adapt.</p>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
			<ul style="list-style-type: none"> To incorporate coastal habitat retreat, considering setbacks and retreat areas, Greater consideration of coastal hazards: <ul style="list-style-type: none"> Sea level rise and seawater intrusion Erosion and excessive sand drift Mosquito and midges Language recommended should be 'identify and protect' 	
		Balancing development & protection	<p>Many commented on the use of the word balance in coastal areas the former is about trading one asset / outcome off against another; the latter is about meeting needs in an integrated way.</p> <p>Some suggested that wording should be change to avoid recreational uses in sensitive areas and to be able manage impacts as opposed to having minimal impacts.</p> <p>Others thought that the policy was pro-development and the focus should be more on sustainability.</p>	Policies have been amended to remove the word balance, to provide greater emphasis on sustainable and adaptable development, avoid recreational uses in sensitive areas and managing impacts.
	7, 28, 35, 75	Access to the coast	There was comments regarding the need to improve access to coastal areas for all including those with a disability but recognising that access to the coast needs to be safe and cognisant of coastal features.	Words were amended to enabling public access and providing the provision of environmentally sensitive coastal infrastructure.
	9, 15, 16, 38, 47, 54, 56,	Hazards	Comments sought:	The policy provides an indication (although not exhaustive) of the types of developments that

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	76, 79, 81, 123	Protection of infrastructure & development from hazards	<ol style="list-style-type: none"> 1. To place infrastructure in a place to protect developments as risk 2. clarity on what development require a coastal location 3. to recognise the role of the building code of Australia to build structurally sound and accommodate risk in coastal location 4. to recognise stormwater flow, flooding and water quality 5. guidance on rearrangement of titles and transport demountable houses in Coastal areas. 6. Adaption strategies to protect existing development. 	<p>would require a coastal location and the P & D Code policy will provide further guidance</p> <p>The P & D Code will address specific issues and any changes need to be consistent with the BCA.</p> <p>The guidance notes have been amended to identify development likely to be subject to coastal hazards and to prepare adaption strategies.</p>
	17, 33	Protect coast from impacts of upstream development	Policies should reflect the need to minimise impacts of upstream development and stormwater on the coastal environment as part of a landscape approach to ecosystems including better waste management practices	Noted. Consider this fits better in other SPPs such as SPP 14 Water Security and Quality.
	17, 38, 40, 123	Legislation	<p>Submissions recommended that additional related legislation be included.</p> <p>One submission requested the removal of 'recreation path' from the definition of development, should be corrected in SPPs and Code</p>	<p>Agree with the exception of the '<i>Natural Resources Management Act</i>' which is likely to be repealed prior to adoption of the SPPs</p> <p>Add the following to the list of '<i>Related legislation and instruments</i>' on page 60:</p> <ul style="list-style-type: none"> • <i>Environment Protection Biodiversity and Conservation Act 1999</i> • <i>Aquaculture Act 2001.</i> • <i>Environment Protection Act, 1993</i>

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
				The recreation path relates to a change in definitions rather than overarching SPPS
	66, 76, 35, 86	Policy 2 Aboriginal Heritage	Consider inclusion of content recognising the special importance of the coast (and waterways) in aboriginal culture and engagement with indigenous communities.	the cultural significance/needs of the coast to Aboriginal and non- Aboriginal have been recognised in amendments
WATER SECURITY AND QUALITY	43, 62	Protection of Water Supply	Need to be mindful of land uses in water catchment areas.	Noted.
	8, 28	Stormwater Management Policy 14.4	Need to acknowledge that developers must contribute to the upgrade of council stormwater infrastructure. Policy to be linked to future IA's.	Noted. The SPPs cannot provide direction to the development industry to update council infrastructure.
	9, 17, 40, 43, 47, 54, 56, 68, 74, 75, 76, 78, 88	Alternative Water Sources	Submitters suggested that reference be made to alternative water sources managed aquifer recharge etc and links to good WSUD practice. Development and design needs to address water scarcity and variability issues, for both potable and non-potable water sources. Need to consider additional water sources such as desalination plant to reduce impact on water sources eg Murray River	The SPPs cannot provide specific solutions to water management. It can and does recognise the importance of enabling these solutions to occur.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	47, 54, 62, 78, 132	Water Capture and Reuse	<p>Identification of future economic and social benefits arising from clear policies at this stage for sustainable use and reuse of water resources should be considered.</p> <p>Green Star rating tools have a strong focus on reducing potable water use and ensuring water quality, which can be useful benchmarks for this policy.</p>	Noted.
	16, 40, 47, 56, 74, 76, 132, 80	Environmental Flows	<p>Submitters identified that the policy should mention environmental flow would be worthwhile in support of creating healthy environments. These promote and sustain freshwater ecosystems and promote general river health.</p> <p>Further consideration needed of the protection of water dependent ecosystems, and ensuring that environmental flows in catchments are maintained.</p>	Noted. This has been incorporated into the policy. The protection of our ecosystems is dealt with in SPP 4 – Biodiversity.
	43, 47, 56, 76	Water Infrastructure	Submissions suggested that the policy should include a position for water infrastructure including the protection of aquifers, strategic provision and the funding of this infrastructure.	The SPPs cannot provide local direction which is required for the protection of aquifers. The requirements and expectations associated with the provision of water infrastructure varies and as such the SPPs provide a high level direction that it is a key consideration for infill development and other new types of development.
	17, 32, 43, 47, 54, 56, 68, 74, 75,	Water Sustainable Urban Design	There was overwhelming support throughout the engagement process, but specifically written submissions on the recognition and use of	WSUD and Climate smart development has been incorporated through multiple SPPs

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
	76, 78, 86, 87, 132		<p>WSUD. Submitters suggested that the policy should be strengthened to reflect this.</p> <p>It was also noted that Building Design should consider more sustainable water practices.</p>	including SPP 2 – Design Quality and SPP 5 – Climate Change.
	40, 47, 62, 76, 131	Water Protection Areas/ Catchments and Development	Submitters advised the need to address and acknowledge conflict between traditional water protection measures and development in watershed areas. In addition it was also identified that the policy should consider the broader exploitation of water	The SPP provides content to this effect.
	137	Environmental Requirements	Submitter indicated that the policy should consider the protection of surface as well as ground water and that there was no mention of NRM Plans.	Noted.
NATURAL HAZARDS	2, 8, 68, 86, 123, 128, 130, 132, 137	Location of Development/ Infrastructure	<p>Noted that the policy should provide direction for development and infrastructure to be located outside of high hazard risk areas.</p> <p>It was also stated that design should be incorporated to mitigate risks.</p>	<p>Noted.</p> <p>The intent of this policy is to recognise the importance of locating key infrastructure and development outside of risk areas. Where this cannot be achieved (for numerous reasons or is retrospective), the policy suggests that design solutions should be employed to mitigate risk.</p>
	9, 11, 33, 43, 56, 74	Green Infrastructure	There was overwhelming support for green infrastructure.	Noted. Green infrastructure and its provision has been

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
				captured in SPPs 4 – Biodiversity, SPP 5 – Climate Change.
	38	Conflict with Building Code of Australia	Submitter noted that the SPPs provide additional objectives in relation to construction.	Noted. The SPPs are a policy framework only. They provide a platform for further investigations and do not propose alterations to the Building Code of Australia.
	43	High Risk Areas	The SPPs provide no direction for high risk areas of flooding and bushfire.	Noted. It is not the SPPs role to provide solutions to local issues. They provide a broad policy framework which recognises and articulates the planning systems role in mitigating these risks.
	43	Earthquakes	Earthquakes not listed	Noted.
	68, 79, 140	Climate Smart	Design should be climate smart design and deal with heavy rainfall events by incorporating WSUD. It was also recommended that new development that is likely to exacerbate climate change should be prohibited.	The use of climate smart technology and WSUD are incorporated in SPP 2 – Design Quality and SPP 5 – Climate Change.
	8, 14, 28, 85, 137,	Risk Hierarchy	There is mention that the policy fails to provide a hierarchy of risk and that there is no risk assessment at development assessment stage.	Development assessment processes are out of scope for SPPs.

State Planning Policy	Submission Number	Topic	Key Issue(s)	Action
EMMISSIONS AND HAZARDOUS ACTIVITIES	43, 47, 74, 76, 86	Historical Land Uses	Respondents advised that prior uses should be considered and that a policy trigger requiring appropriate land contamination investigations to be undertaken prior to rezoning to residential or other sensitive uses.	The SPP applies a high level approach in articulating that any risk posed by known or potential contamination of sites is adequately assessed.
	56	Noise Emissions	The analysis of aircraft noise by the City of West Torrens should be incorporated into the SPP.	This information should be used in development the Regional Plan and key policy within the Planning and Design Code.
	74, 108, 128	Land Use Separation	Policy needs to be strengthened to ensure appropriate separation/buffer distances.	The SPPs can only provide a framework to guide content in Regional Plans and the Planning and Design Code. The quantifiable distances and separation/buffer arrangements will be included in the Planning and Design Code with Regional Plans identifying where such separation buffers/distances are required.
	47, 74, 75, 108, 132,	Emissions	Respondents advised that emissions from a range of sources should be recognised and rectified.	Noted.
	108	Waste Infrastructure	Respondents advised that the policy should include reference to waste depots as essential infrastructure.	Noted.
	108	Radiation	This section would benefit from the discussion of radiation in the main body of the Introduction to give context.	Additional wording has been included in the SPP.

Attachment 2 - Evaluation Results

Results of the community mandatory evaluation indicators

	Evaluation statement	Strongly disagree	Somewhat Disagree	Not sure	Somewhat Agree	Strongly agree
1	I feel the engagement genuinely sought my input to help shape the proposal (Principle 1)	10%	10%	12%	37%	27%
	- Community Panel	0%	0%	0%	38%	62%
	- YourSAy	10%	13%	18%	47%	10%
	- Written submissions	17%	17%	17%	50%	0%
	Reasons for a negative evaluation for this statement related to concerns with particularly planning issues rather than the engagement itself.					
2	I am confident my views were heard during the engagement (Principle 2)- Written submissions	25%	25%	8%	42%	0%
	People advised that there was not enough detail in the What We Had Heard Report to provide a positive response to this question. A more detailed summary of submissions and a response was requested. However this is unable to be delivered for the timing of evaluation.					
3	I was given an adequate opportunity to be heard (Principle 3)	7%	10%	14%	38%	32%
	- Community Panel	0%	0%	0%	17%	83%
	- YourSAy	14%	14%	19%	46%	8%
	- Written submissions	0%	16%	25%	58%	0%
4	I was given sufficient information so that I could take an informed view.(Principle 3)	9%	7%	11%	47%	26%
	- Community Panel	0%	0%	0%	37%	63%
	- YourSAy	10%	47%	18%	13%	10%
	- Written submissions	25%	0%	8%	66%	0%
	Some participants wanted more information on the planning issues being addressed, to a level beyond the scope of the SPP. It was suggested that more examples and videos would assist understanding.					
	Positive comments included that the SPPs were comprehensive, people felt well informed given the breadth of the topic.					
5	I felt informed about why I was being asked for my view, and the way it would be considered. (Principle 4)	3%	3%	26%	41%	31%
	- Community Panel	0%	0%	0%	46%	54%
	- YourSAy	5%	5%	37%	34%	18%
	- Written submissions	0%	8%	33%	41%	27%
	Additional Evaluation					
6	The information provided on the draft State Planning Policies were clear and understandable	8%	8%	11%	38%	35%
	- Community Panel	0%	0%	4%	42%	54%
	- YourSAy	13%	13%	15%	36%	23%
	Some participants thought there was a bit too much Jargon, a little bit repetitive and generalised. Whilst others thought the SPPs were clear and understandable.					
7	I understand how the draft State Planning Policies may affect me as a South Australian resident	5%	7%	13%	33%	43%
	- Community Panel	0%	0%	8%	33%	58%
	- YourSAy	8%	11%	16%	32%	32%
8	I understand how the draft State Planning Policies may affect me as a member of the planning /building industry YourSAy	9%	0%	55%	9%	27%

Results of DPTI's engagement (the Engagement Entity's) evaluation

The engagement was evaluated by Sally Jenkin, Lead of the Community Engagement Charter.

	Evaluation statement	Response options (<i>Select answer</i>)
1	The engagement reached those identified as the community of interest (Principle 2)	<ul style="list-style-type: none"> ▪ Representatives from most community groups participated in the engagement <p>The engagement successfully reached the community groups identified in the Engagement Plan and other members of the community through YourSAY and the Royal Adelaide show.</p>
2	Engagement was reviewed throughout the process and improvements put in place, or recommended for future engagement (Principle 5)	<ul style="list-style-type: none"> ▪ Reviewed and recommendations made in a systematic way <p>As a result of the feedback being received during engagement the consultation period was extended by two weeks and additional events were organised.</p>
3	Engagement occurred early enough for feedback to genuinely influence the planning policy, strategy or scheme	<ul style="list-style-type: none"> ▪ Engaged when there was opportunity for input into scoping <p>At all stages of engagement, feedback was able to be genuinely be considered. Government agencies assisted in preparing the SPPs and other early engagement events with key stakeholders resulted in changes to the SPPs prior to consulting on the draft.</p>
4	Engagement contributed to the substance of the State Planning Policies	<ul style="list-style-type: none"> ▪ Government agencies contributed to the SPPs in a significant way as the SPPs are a reflection of State Government policies. ▪ All other stakeholder groups were able to contribute to the final SPPs.
5	Engagement included the provision of feedback to community about outcomes of their participation	<ul style="list-style-type: none"> ▪ All attendees at engagement events received a summary report at the conclusion of the event ▪ A what we had heard report was released publically and emailed to all written submitters.