



**3.2 STRUCTURE PLANNING – STATE GOVERNMENT PLANNING REFORM  
UPDATE**

*Report Author/Manager: Alexa Carr & Matthew Romaine*

*General Manager: Craig Harrison*

*(Meeting Date: 1 May 2018)*

*(Location: Council Wide)*

**PROPOSAL**

To provide Council with an update on the ongoing State Government Planning Reform.

**BACKGROUND**

The Department of Planning, Transport and Infrastructure (DPTI) is working on mechanisms to implement a new planning system (the Planning, Development and Infrastructure Act) in stages over the next few years. This new planning system will have significant implications for all Councils.

Council is working to understand and address the implications of the reform for the City of Mitcham, both in partnership with the State Government and through a collaborative process with our community.

As part of the collaborative process, DPTI has been and will continue to engage with Councils on various aspects of the new planning system and its implementation.

Mitcham Council has provided responses to DPTI on a number of aspects of the new planning system, including the draft Community Engagement Charter, a high level overview of the existing Development Plan, a technical discussion paper on future land use definitions and classes, a discussion paper on the proposed Accredited Professionals Scheme and has participated in various workshops, including on carparking and the new e-Planning system.

The State Government has recently released the Blueprint for South Australia's Planning & Design Code. The Blueprint provides the first formal outline of the Code and the intentions around engagement with Councils, communities, professional and developers in the Code's preparation and implementation.

Information on the State Government's Planning Reform, including the various discussion papers, can be found at <http://www.saplanningportal.sa.gov.au/>

**Attachments:**

- A. Council's endorsed response to the discussion draft Community Engagement Charter
- B. Administration's response to High Level Development Plan Overview
- C. Administration's response to the Future Land Use Definitions and Classes Technical Discussion Paper



- D. Administration's response to the Accredited Professionals Scheme Discussion Paper

### STRATEGIC OBJECTIVES

#### Goal 1 Accessible & Connected Community

Objective 1.6 Our community is actively encouraged and supported to have a voice and to participate in a meaningful way in shaping our City.

#### Goal 3 Dynamic & Prosperous Economy

Objective 3.3 We work collaboratively with neighbouring Councils, State Government and private sector partnerships.

### DISCUSSION

#### Community Engagement Charter

The Community Engagement Charter aims to increase community understanding of the planning system, by emphasising community involvement and input into planning policies that will help to shape places, rather than responding to individual developments at the assessment stage.

The Community Engagement Charter will provide the framework for determining how engagement should be conducted, and how its effectiveness should be evaluated at the end of the process, when planning policy documents are being prepared. The framework may specify mandatory requirements that must be followed, or set performance outcomes that are required to be met where mandatory requirements are not appropriate.

The Charter will not apply to development applications under assessment. Separate requirements for public notification of certain classes of development are outlined in the Planning Development and Infrastructure Act, with procedures to be determined in the Regulations (which are not yet prepared).

At its meeting of 3 October 2017, the Strategic Planning and Development Policy Committee endorsed a response to the Community Engagement Charter discussion draft. A copy of Council's response is contained in **Attachment A**.

A Consultation Draft Community Engagement Charter, together with a draft Guide, was subsequently released by DPTI and is available at: [http://www.saplanningportal.sa.gov.au/planning\\_reforms/new\\_planning\\_tools/community\\_engagement\\_charter](http://www.saplanningportal.sa.gov.au/planning_reforms/new_planning_tools/community_engagement_charter). Council did not provide a formal response on the consultation draft, given it had already provided comment on the discussion draft.

It is anticipated that the Community Engagement Charter will be trialled by the State Planning Commission as it develops State Planning Policies and the Planning and Design Code library, as well as Infrastructure Scheme pilot programmes. It is anticipated that during this time, an on-line tool kit will be developed to assist future users of the Charter.



Once finalised, the Community Engagement Charter and on-line tool kit will be released for use by Councils, with the transition from Development Plans to the Planning & Design Code requiring community consultation in line with the Community Engagement Charter.

It is noted that Council's consultation planned for August 2018 is being developed in line with the Community Engagement Charter.

#### High Level Overview of Development Plan

In December 2017, the Administration provided a response to a request by DPTI for a high level overview of the existing Mitcham (City) Development Plan.

The response provided comment on:-

- the existing Development Plan, including policy intent, envisaged development types and whether an equivalent zone within the South Australian Planning Policy Library (SAPPL) exists;
- challenges with the application of SAPPL content;
- Development Plan policy which should be considered for transition to the Code;
- gaps in existing policy; and
- high level policy issues for consideration in future policy.

Given the technical nature of the request and the limited time within which to respond to DPTI, the Administration made a response without seeking Council endorsement.

The response was provided as Administration's views and not an endorsed Council position. A copy of the response is contained in **Attachment B**.

The response will be used as background information in the preparation of the Planning and Design Code. It is anticipated that the Planning and Design Code modules will be released for consultation in the first half of 2019. Please refer to the "Blueprint for South Australia's Planning and Design Code" below for further comment.

#### Future Land Use Definitions & Classes

In April 2018, DPTI called for responses to the Technical Discussion Paper on Future Land Use Definitions and Classes.



The Administration made a response to the questions posed by DPTI, including:-

- potential improvements to better reflect contemporary policy and development trends;
- gaps or conflicts within existing definitions;
- land use types which could be grouped;
- how land use classes could be introduced to the Code.

Given the technical nature of the discussion paper and the limited time within which to respond to DPTI, the Administration made a response without seeking Council endorsement. Responses were required to DPTI by 20 April 2018.

The response was provided as Administration's views and not an endorsed Council position. A copy of the Discussion Paper is available at: [http://www.saplanningportal.sa.gov.au/updates/news\\_item?a=435726](http://www.saplanningportal.sa.gov.au/updates/news_item?a=435726) and Administration's response is contained in **Attachment C**.

#### Accredited Professionals Scheme

It is proposed to establish a professional accreditation scheme for planners, building certifiers and other allied industry professionals involved in making planning and development decisions.

The rationale for such a scheme is that it will result in improved confidence in the industry and greater professionalism in decision making.

The proposed scheme sets out a range of levels of accreditation for decision-makers in both planning and building. The levels of accreditation will be dependent on the skills and experience of the individual and will, in turn, determine what type of applications that individual can determine.

An accredited professional will be required to be registered, hold professional indemnity insurance and undertake continuous professional development in mandatory fields, in order to retain accreditation.

All decision-makers, including Council Assessment Panel members, will be required to be accredited.

Given the technical nature of the discussion paper and the limited time within which to respond to DPTI, the Administration made a response without seeking Council endorsement. Responses were required to DPTI by 30 April 2018.

The response was provided as Administration's views and not an endorsed Council position. A copy of the Discussion Paper is available at: [http://www.saplanningportal.sa.gov.au/planning\\_reforms/new\\_planning\\_tools/accredited\\_professionals\\_scheme](http://www.saplanningportal.sa.gov.au/planning_reforms/new_planning_tools/accredited_professionals_scheme) and Administration's response are contained in **Attachment D**.



### Blueprint for South Australia's Planning & Design Code

On 23 March 2018, DPTI released the Blueprint for South Australia's Planning & Design Code ("the Blueprint").

The Blueprint formally introduces the Planning & Design Code ("the Code") and sets the framework for the implementation of the Code over the next two years or so.

The Blueprint indicates that there will be both policy and technical discussion papers being released for comment.

Policy discussion papers will comprise four themes being Integrated Movement Systems, Natural Resources & Environment, People & Neighbourhoods and Productive Economy.

The Code must align with the State Planning Policies ("SPPs") and Regional Plans.

The SPPs are being developed in parallel to the Code. As such, consultation responses on the discussion papers may assist to refine the SPPs, as well as the Code.

It is anticipated that the SPPs and policy discussion papers will be released for comment in the first half of this year.

Time permitting, the Administration will ensure that well-considered responses are brought to the Council (either via the Strategic Planning and Development Policy Committee or Full Council) for endorsement on policy-related matters, as they emerge.

Technical discussion papers will also be released around topics relating to how the Code will work and how assessment pathways will work. It is anticipated that these technical discussion papers will not impact Council and that the Administration will be in a position to respond without requiring endorsement of a Council position.

No response is required to the Blueprint, a copy of which is available at: [http://www.saplanningportal.sa.gov.au/updates/news\\_item?a=435701](http://www.saplanningportal.sa.gov.au/updates/news_item?a=435701)

### Carparking Summit

On 6 April 2018, the Administration attended a car parking summit hosted by DPTI with keynote speakers who brought with them experience gained interstate in their respective fields on the learnings from industry case studies regarding the provision and supply of car parking in Metropolitan Areas. Further to the key note speakers, panel discussions were held with respected practitioners in the fields of Traffic Engineering and Transport Planning and the future of Autonomous Vehicles factoring into the transport network was also briefly discussed.



The primary purpose of the summit workshop revolved around sharing some of the concerns that private developers, Local Governments and State Government experience in relation to the car parking provisions associated with all forms of development ranging from residential infill and greenfield to commercial development and their respective impacts pre and post development. Whilst the discussions held in the workshop were not technical in nature, some of the key outcomes were acknowledged by DPTI that will be incorporated into the Planning and Design Code including:

- undertaking a strategic and unified approach to the parking provisions rates associated with the various land uses across all Local Governments in South Australia;
- reevaluating the supply and demand parking arrangement holistically to adjust to the evolutionary nature of the planning and transport networks; and
- encouraging consideration for mobility/accessibility when developing strategic policies.

As discussed above, technical discussion papers will be released in relation to integrated movement system which will provide Council Administration an opportunity to provide a formal response.

#### ePlanning System

The new planning system will be underpinned by a “one-stop shop” website for provision of information, online services and community participation.

The Administration attended a DPTI presentation about the ePlanning system via live-stream on 23 April 2018.

DPTI provided information on a range of aspects of the ePlanning system, including a general overview of its key features and functions, mapping, and council contributions.

The ePlanning system is in its early stages, and there are many aspects which require further consideration and investigation. However, it is clear that the system will impact Council as an organisation more broadly than just the planning assessment team – including records management, customer request management and IT systems.

At the presentation, DPTI indicated that the cost to Council will perhaps be less than first anticipated. In the first year (being 2019/20) Council’s contribution will be to the order of \$27,000 and subsequent years Council’s contribution will be to the order of \$58,000.

DPTI has suggested that this cost will be counterbalanced by cost savings generated by having a streamlined planning system and a centralised ePlanning portal system (IT system support, licensing, staff efficiencies, legal costs and the like).



DPTI has indicated that it will continue working with the Local Government Association and with Councils to develop, design and test the ePlanning system. It is anticipated that there will be a staged rollout of the system in 2019/20.

### **Community Implications**

There will be significant implications for the community as a result of the planning reform, including the extent to which the community is engaged in planning decisions. The focus will be on engagement with the community at policy formulation stage, rather than through the assessment phase of specific Development Applications, as has occurred historically.

There are other aspects of the planning system which will fundamentally change how the community engages with the planning system – such as how applications are lodged, processed and assessed.

### **Environmental / Heritage Implications**

While there are no direct consequences for the environment or heritage at this stage, it is anticipated that there will be significant implications for these areas following the implementation of the Planning and Design Code. It is important that the Council is adequately prepared to engage with the State Government in the drafting of the Code in effort to preserve and enhance our environment and local heritage.

### **Cost Shifting Implications / Legislative Cost Imposts**

There will be cost implications associated with the planning reform, however these implications are still relatively unknown at this stage.

The Accredited Professionals Scheme may have a cost implication if it transpires that Council is required to fund accreditation, training and insurances for CAP members and staff.

As discussed above, Council will be required to contribute to the development and ongoing maintenance of the new ePlanning system. The first year's contribution will be subsidised, at a cost to the order of \$27,000, and each year thereafter the contribution will be to the order of \$58,000. This will be an additional cost to Council, however there may be savings made in other areas as a result of streamlining and rationalising the planning system, including the online ePlanning system.



### **Impact on Budget including Lifecycle Costing**

It has previously been indicated that, given the importance of the impending changes to the planning system, the existing 1.6 FTE strategy and policy staff members will be wholly engaged in the delivery of the Local Area Planning project and collaboration with DPTI on the implementation of the new planning system. Therefore, these matters will take priority over projects which would ordinarily have been undertaken by Policy staff, including:-

- Review of Community Land in Colonel Light Gardens – i.e. Stage 2 and 3
- Heritage Action Plan reports
- City signage strategy
- Section 29 DPA to correct anomalies in the Development Plan
- Response to various resident queries / complaints
- Student internship and placement of planning graduates
- Progressing work identified by the internal Colonel Light Gardens Steering Group

### **Risk Management / WHS Assessment**

Nil

### **Legal / Policy Implications**

Nil

### **Engagement**

A community engagement exercise is planned for August / September 2018 in accordance with the resolution of Council from its meeting of 23 January 2018, on the Spatial Vision for the City of Mitcham, Precinct Outcomes and Precinct Structure Plans.

It is anticipated that further community consultation will be required in respect of the spatial application of the Planning & Design Code in 2019/20. However, it is not yet clear whose responsibility this is or what it would include.

### **CONCLUSION**

The State Government's Planning Reform is well underway. DPTI is engaging with Council on both a policy and technical matters. The Administration undertakes to keep the Council informed on the progress of the implementation of the new planning system, and will policy related matters to Council.



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The roll-out of the Planning Reform reinforces the value of the Spatial Vision and Local Area Planning project Council is undertaking. It is a generational opportunity for the City of Mitcham to influence the planning policy framework and to shape the future of the City of Mitcham.

**RECOMMENDATION – ITEM 3.2**

That the report be received for information only.

11 October 2017

The State Planning Commission  
GPO Box 1815  
Adelaide, SA, 5001

Attention: Mr Tim Anderson QC  
[DPTI.Planning.Engagement@sa.gov.au](mailto:DPTI.Planning.Engagement@sa.gov.au)



**RE: CITY OF MITCHAM RESPONSE TO THE COMMUNITY ENGAGEMENT CHARTER**

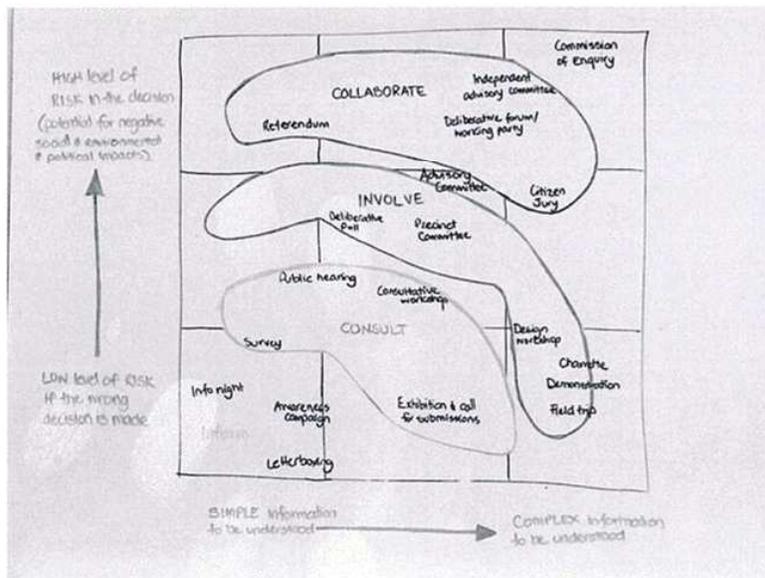
I refer to the above, and would like to thank the Planning Commission for providing Council with the opportunity to provide feedback in relation to the Charter.

I would also like to acknowledge efforts to conduct a deliberative process to develop the draft Charter with the community, and commend the Commission on this type of collaborative approach.

At its meeting on 10 October 2017, the City of Mitcham considered its response to the draft Charter, and would like to offer the following comments as a result:

- 1) In relation to the 8 principles, it is considered that they are sound and go a long way to reflecting community expectation. Building on these principles, it should be made clear to members of the public as to how they can get involved in planning decisions.

While it is acknowledged that the discussion paper suggests that this may form part of a future implementation plan, Council is of the view that it might be better to provide this kind of certainty within the Charter itself. This might be best achieved through the inclusion of a matrix which explains how entities and practitioners might determine engagement pathways that reflect the principles:



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This kind of model might assist in determining the best engagement tools to suit specific situations, and provide a tool that simplifies the considerations on page 11 of the discussion paper (reach, impact, sociability, tone, sustainability and depth).

It is understood that the intention of the reform is to provide more flexibility in relation to community engagement, and to set up a system that allows engagement processes to be adapted to respond to the particulars of each situation.

The matrix above provides a framework for this to occur, however it is also acknowledged that a lack of certainty and prescription around which engagement processes will be applied to particular types of planning issues might lead to confusion and potentially an adversarial relationship with the community.

Ultimately, it is the Council's view that our community will always be interested in planning issues at the stage where there is clarity and certainty as to how development might affect their enjoyment of their own properties or their own personal lives.

It follows therefore that the Commission is also encouraged to consider providing greater clarity around the anticipated level of community involvement in development assessment prior to finalising the Charter for Parliamentary consideration. This is of particular interest to the City of Mitcham as it potentially relates to residential infill development.

At present, it is understood that neighbouring property owners will be notified of residential development that does not satisfy the Planning and Design Code in its entirety. It is also understood that there is scope for the Code itself to exclude certain classes of development from requiring notification notwithstanding whether it meets the Code in its entirety. Given that the Code is yet to be developed, there is a great deal of uncertainty surrounding these issues.

**The City of Mitcham requests that through the development of the Planning and Design Code, the Commission ensure that community consultation is retained in the Development Assessment Process so that residents will still have the opportunity to submit feedback in relation to individual development applications.**

- (2) While it is acknowledged that it is important to create mechanisms to measure the success of the new planning system, some of the performance measures within the Charter may be difficult to measure, and hence may attract criticism. In particular, those measures which are subjective or are not numerically based might prove to be problematic (e.g. 'the engagement was accessible and jargon-free').

It is recommended that these types of subjective measures should be rephrased such that a number can be drawn from a survey, for example, where members of the community who were engaged are able to express their perception of the process.

In addition, Council determined that the creation of additional measures might be appropriate, as the current measures in the draft Charter only serve to measure the engagement process as opposed to the planning outcome that will (ultimately) result.

The premise for this feedback is that we don't consult to undertake good consultation per se, but instead we consult to achieve good planning outcomes on the ground.

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- (3) Council's final consideration related to the process for determining whether engagement has met the 'spirit' of the Charter. Ultimately, it is understood that the Planning Commission will make this determination, assumedly in the event that a person or body is aggrieved by the process that has been undertaken. As a result, Council recommends that the Commission should consider a mechanism where Councils are able to request that the Commission provide early guidance as to the appropriateness of engagement plans prior to commencement. This kind of process will serve to prevent both unnecessary work, and rework.

In closing, the City of Mitcham is supportive of the principles within the Charter, and acknowledges that they have been developed in a deliberative way with a sound cross section of the community. Council would like to encourage the Commission to continue to engage with the community and different entities in this way throughout the implementation of the new planning system.

Should you have any enquiries or require any clarification in relation to any point in this correspondence, please do not hesitate to contact Council's General Manager Development Services and Community Safety, Mr Craig Harrison, on 8372 8888.

Yours sincerely



**Glenn Spear**  
MAYOR



Local Area Planning Project  
Draft Development Plan Review

(A) Streamlining Zoning

Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
Residential (East Plains)	Residential	<ul style="list-style-type: none"> <li>Residential development at very low density</li> <li>Grand homes on large allotments with substantial landscaping around</li> <li>Single &amp; two storey detached dwellings on sites &gt;800m<sup>2</sup> and frontage &gt;20m</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Portion nominated for "Special Character Area" overlay</li> <li>Portion subject to "Springfield Conservation Management Plan"</li> <li>Portion subject to Springfield Estate Residents Association (SERA) Encumbrance (Land Management Agreement)</li> <li>Portion subject to Residential Watercourse</li> <li>Potentially standard "residential" module in P&amp;D Code with overlays</li> </ul>
Residential (Central Plains)				
PA8	Residential	<ul style="list-style-type: none"> <li>Residential development at low density</li> <li>Primarily single storey detached dwellings on sites &gt;500m<sup>2</sup></li> <li>Semi-detached - &gt;425m<sup>2</sup></li> <li>Other dwelling types - &gt;400m<sup>2</sup></li> <li>Frontage widths vary from 9m – 15m</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Semi-detached dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Flood Mapping overlay over portion</li> <li>Bushfire Hazard overlay over portion</li> <li>Portion nominated for "Special Character Area" overlay</li> <li>Potentially standard "residential" module in P&amp;D Code with overlays</li> </ul>
PA9	Residential	<ul style="list-style-type: none"> <li>Residential development at low density</li> <li>Primarily single storey detached dwellings on sites &gt;550m<sup>2</sup></li> <li>Other dwelling types - &gt;450m<sup>2</sup></li> <li>Frontage widths vary from 9m – 15m</li> <li>Quasi historic conservation area</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Portion of policy area nominated for "Special Character Area" overlay</li> <li>Flood Mapping overlay over portion</li> <li>Potentially standard "residential" module in P&amp;D Code with overlays</li> </ul>
PA10	Residential	<ul style="list-style-type: none"> <li>Residential development at low-medium density</li> <li>Opportunity for higher densities where total development site is greater than</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Semi-detached dwellings</li> <li>Row dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Bushfire Hazard overlay over portion</li> <li>Potentially standard "residential" module in P&amp;D Code with overlays</li> </ul>

Collaborative Work Programme

Development Plan Review  
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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
		<ul style="list-style-type: none"> <li>2,000m<sup>2</sup></li> <li>Single and two storey detached dwellings on sites &gt;500m<sup>2</sup></li> <li>Semi-detached – &gt;425m<sup>2</sup></li> <li>Other dwelling types – &gt;400m<sup>2</sup></li> <li>Where overall site is &gt;2,000m<sup>2</sup> and boundaries &gt;35m, sites may be &gt;325m<sup>2</sup></li> <li>Frontage widths vary from 9m – 15m</li> </ul>	<ul style="list-style-type: none"> <li>Group dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	
PA11	Residential	<ul style="list-style-type: none"> <li>Residential development at low to medium density</li> <li>Higher density as policy area is located adjacent District Centre zones and has accessibility to services and facilities</li> <li>Site area for new dwellings should be &gt;350m<sup>2</sup></li> <li>Frontage widths vary from 9m – 15m</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Semi-detached dwellings</li> <li>Row dwellings</li> <li>Group dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Bushfire Hazard overlay over portion</li> <li>Potentially standard “residential” module in P&amp;D Code with overlays</li> </ul>
PA12	Residential	<ul style="list-style-type: none"> <li>Residential development at low density</li> <li>The policy area is a transition area between industry/commerce areas and residential</li> <li>Primarily replacement of existing dwellings with limited additional dwellings</li> <li>Small scale non-residential uses compatible with residential development</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> <li>Small-scale shops</li> <li>Small-scale consulting rooms</li> <li>Small-scale offices</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard “residential” module in P&amp;D Code</li> </ul>
PA15	Residential (Historic Conservation Area)	<ul style="list-style-type: none"> <li>Residential development at low density, primarily single storey detached dwellings</li> <li>Conservation and enhancement of established historic character</li> <li>Development should be limited to replacement dwellings and dwelling alterations &amp; additions</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Historic Conservation Area – NO CHANGE</li> </ul>
Residential (Foothills)	Residential Hills	<ul style="list-style-type: none"> <li>Residential development at low density – primarily single and two storey detached dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Group dwellings</li> <li>Semi-detached dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Possible redraw of boundary to split the zone between “Residential Hills Zone” and “Residential” module in P&amp;D</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
		<ul style="list-style-type: none"> <li>Development which responds to the topography of the area and minimises visual and environmental impact</li> <li>Development (land division) potential is based on the slope of land</li> <li>Allotment sizes range from 700m<sup>2</sup> to 1,200m<sup>2</sup> for detached dwellings</li> <li>Allotment sizes range from 500m<sup>2</sup> to 900m<sup>2</sup> for group dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Code</li> <li>Important differential between "hills" and "plains" – bushfire, access, allotment size, general character</li> <li>Bushfire Hazard overlay</li> <li>Flood Mapping overlay over portion</li> <li>Portion of Residential Foothills nominated for "Special Character Area Overlay"</li> <li>Maintain Hills-type zone in P&amp;D Code</li> </ul>
Residential (Hills)	Residential Hills	<ul style="list-style-type: none"> <li>Residential development at low density – primarily single and two storey detached dwellings</li> <li>Maintain and enhance natural vegetation and features of Mt Lofty Ranges</li> <li>Development (land division) potential is based on the slope of land</li> <li>Allotment sizes range from 1,200m<sup>2</sup> to 2,000m<sup>2</sup> for detached dwellings</li> <li>Allotment sizes range from 700m<sup>2</sup> to 1,600m<sup>2</sup> for group dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Group dwellings</li> <li>Semi-detached dwellings (where site is flat)</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Important differential between "hills" and "plains" – bushfire, access, allotment size, general character</li> <li>Bushfire Hazard overlay</li> <li>Flood Mapping overlay over portion</li> <li>Portion of Residential Hills nominated for "Special Character Area" overlay</li> <li>Maintain as "Residential Hills Zone" in P&amp;D Code</li> </ul>
PA17	Residential - Historic Conservation Area	<ul style="list-style-type: none"> <li>Retain and conserve places that contribute to the historic character of the policy area</li> <li>Low density development - primarily single storey detached dwellings which complement existing small scale symmetrical cottages in the area</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Status quo to remain to protect heritage value of area</li> <li>Bushfire Hazard overlay</li> <li>Historic Conservation Area – NO CHANGE</li> </ul>
Residential (Blackwood Urban)	Residential	<ul style="list-style-type: none"> <li>Residential development at higher densities than R(H) due to proximity to services and facilities but in keeping with "hills" character</li> <li>Accommodates a range of dwelling types</li> <li>Detached dwellings - &gt;450m<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Semi-detached dwellings</li> <li>Group dwellings</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Opportunity for higher density along ridgeline and adjacent main commercial/shopping precinct of Blackwood</li> <li>Bushfire Hazard overlay</li> <li>Potentially standard "residential" module in P&amp;D Code? or subzone in "Residential Hills" zone?</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
Residential (Craigburn)	Residential	<ul style="list-style-type: none"> <li>Residential development at low to medium density – primarily single and two storey detached dwellings</li> <li>Coordinated / staged greenfield development – land division generally undertaken in a staged manner</li> <li>Compact hills living</li> </ul>	<ul style="list-style-type: none"> <li>Detached dwellings</li> <li>Display homes (temporary) as part of staged land releases</li> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Bushfire Hazard overlay</li> <li>Potentially standard “residential” module in P&amp;D Code with overlay</li> </ul>
State Heritage Area (Colonel Light Gardens) <ul style="list-style-type: none"> <li>PA1</li> <li>PA2</li> <li>PA3</li> </ul>	-	<ul style="list-style-type: none"> <li>Conservation and reinforcement of the heritage value and integrity of the original “garden suburb”</li> <li>Retention and conservation of existing housing stock</li> <li>Dwelling alterations &amp; additions in keeping with the existing character</li> <li>Various community and small scale commercial activities that reflect the original design and land use intent of the garden suburb</li> </ul>	<ul style="list-style-type: none"> <li>Dwelling alterations &amp; additions</li> <li>Domestic outbuildings or structures associated with a dwelling</li> <li>Small scale non-residential uses in designated policy areas</li> </ul>	<ul style="list-style-type: none"> <li>No direct equivalent SAPPL zone</li> <li>Suggest a State-wide “State Heritage Zone” with policy areas over the individual S/H Areas (eg “Colonel Light Gardens”, “Mount Torrens”) be included in the P&amp;D Code</li> <li>Subject to Colonel Light Gardens Conservation Management Plan</li> <li>Historic Conservation Zone – NO CHANGE</li> </ul>
Historic Cons. (Belair Village)	Historic Conservation Area ? No zone equivalent	<ul style="list-style-type: none"> <li>Preservation and reinforcement of the heritage character of the area</li> <li>Primarily residential development, but also accommodates low scale community, recreation, tourism, office, shopping and commercial activities that serve a local function</li> <li>Non-residential development should be restricted to sites and buildings already utilised for that purpose</li> <li>Land division restricted</li> <li>Residential development should complement the existing character of the area</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Detached dwellings</li> <li>Domestic outbuildings or structures associated with a dwelling</li> <li>Dwelling alts &amp; adds</li> </ul>	<ul style="list-style-type: none"> <li>Status quo to remain to protect heritage value of area</li> <li>Bushfire Hazard overlay</li> <li>Historic Conservation Zone – NO CHANGE</li> </ul>
Historic Cons. (Mitcham Village)	Historic Conservation Area ? No zone equivalent	<ul style="list-style-type: none"> <li>Preservation and reinforcement of the heritage character and integrity of the area</li> <li>Primarily residential development, but also includes low scale non-residential uses that serve a local function</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Community centre/facility</li> <li>Detached dwellings</li> <li>Domestic outbuildings or structures associated with a dwelling</li> <li>Dwelling alts &amp; adds</li> <li>Group dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Status quo to remain to protect heritage value of area</li> <li>Flood Mapping overlay over portion</li> <li>Bushfire Hazard overlay</li> <li>Subject to Mitcham Village Conservation Management Plan</li> <li>Historic Conservation Plan – NO</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
			<ul style="list-style-type: none"> <li>Office</li> <li>Recreation area</li> <li>Semi-detached dwellings</li> <li>Shop</li> <li>Tourism</li> </ul>	CHANGE
District Centre	District Centre	<ul style="list-style-type: none"> <li>Accommodates a range of services, facilities and activities and provides a focal area for the surrounding district</li> <li>Accommodates shopping facilities that provide for both convenience and less frequent shopping trips</li> <li>Improvement of pedestrian accessibility</li> <li>Retention of isolated large trees in the area which dominate the built form</li> <li>Mitcham – Torrens Arms Hotel, Waverley House, Mitcham Community Centre, Mitcham Railway Station, Council Chambers remain the dominant buildings in the area</li> <li>Development in accordance with concept plans for Mitcham and Blackwood areas</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Bank</li> <li>Commercial</li> <li>Community centre/facility</li> <li>Consulting room</li> <li>Cultural facility</li> <li>Educational facility</li> <li>Entertainment</li> <li>Hotel</li> <li>Office</li> <li>Place of worship</li> <li>Recreational area</li> <li>Shop</li> <li>Supermarket</li> </ul>	<ul style="list-style-type: none"> <li>Flood mapping overlay (to Mitcham area)</li> <li>Bushfire Hazard overlay (to Blackwood)</li> <li>Potentially “District Centre” module in P&amp;D Code</li> </ul>
Neighbourhood Centre	Neighbourhood Centre	<ul style="list-style-type: none"> <li>Accommodates a range of retail, community, office, commercial, entertainment, educational, religious and recreational facilities that serve the daily needs of the neighbourhood</li> <li>Improvement to pedestrian accessibility</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Commercial</li> <li>Community centre/facility</li> <li>Consulting room</li> <li>Educational facility</li> <li>Entertainment</li> <li>Office</li> <li>Place of worship</li> <li>Recreational area</li> <li>Shop</li> </ul>	<ul style="list-style-type: none"> <li>Potentially “Neighbourhood Centre” module in P&amp;D Code</li> </ul>
Local Centre	Local Centre	<ul style="list-style-type: none"> <li>Accommodates a range of small-scale shopping and community facilities</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Community centre/facility</li> <li>Consulting room</li> <li>Office</li> <li>Shop (GLFA &lt;450m<sup>2</sup>)</li> </ul>	<ul style="list-style-type: none"> <li>Potentially “Local Centre” module in P&amp;D Code</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
Institutional	Community No zone equivalent	<ul style="list-style-type: none"> <li>Accommodates public and private activities of an institutional and/or open character</li> <li>Development should preserve the open character</li> <li>Development should not impair amenity of adjoining residential development</li> </ul>	<ul style="list-style-type: none"> <li>Cultural facility</li> <li>Educational facility</li> <li>Hospital</li> <li>Playing fields</li> <li>Research facility</li> <li>Cemetery</li> </ul>	<ul style="list-style-type: none"> <li>No direct SAPPL equivalent</li> <li>Similar to "Community" zone in SAPPL, with "Recreation Policy Area" applying to some areas</li> <li>Opportunity to consider application of zoning in areas currently zoned "Institutional"</li> <li>Flood Mapping overlay over portion</li> <li>Bushfire Hazard overlay over portion</li> </ul>
Mixed Use (Belair Road)	Mixed Use	<ul style="list-style-type: none"> <li>Accommodates a range of uses which are integrated where appropriate and coordinated both within and with adjoining sites</li> <li>Outdoor advertising which is coordinated and does not dominate the appearance of the streetscape</li> <li>Non-residential development along Belair Rd should generally provide services for nearby residents.</li> <li>The mix of uses along Belair Rd should include lower intensity or small-scale retail and local offices and consulting rooms, with opportunity for integrated medium density (residential) development towards the rear of sites and on upper levels.</li> <li>Two storey non-residential development and three storey residential development (could comprise 2 non-residential and 1 residential)</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Community uses (&lt;500m<sup>2</sup>)</li> <li>Consulting room (&lt;250m<sup>2</sup>)</li> <li>Office (&lt;250m<sup>2</sup>)</li> <li>Residential (&gt;150m<sup>2</sup>)</li> <li>Retail showroom (&lt;300m<sup>2</sup>)</li> <li>Service trade premises (&lt;500m<sup>2</sup>)</li> <li>Shop (&lt;250m<sup>2</sup>)</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard "Mixed Use" module in P&amp;D Code</li> </ul>
Mixed Use (Goodwood)	Mixed Use	<ul style="list-style-type: none"> <li>Accommodates a range of uses which are integrated where appropriate and coordinated both within and with adjoining sites</li> <li>Development provides a transition to uses in adjoining zones (residential)</li> <li>Retention and conversion and</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Community uses (&lt;250m<sup>2</sup>)</li> <li>Consulting room (&lt;250m<sup>2</sup>)</li> <li>Office (&lt;250m<sup>2</sup>)</li> <li>Residential (&gt;200m<sup>2</sup>)</li> <li>Retail showroom (&lt;250m<sup>2</sup>)</li> <li>Service trade premises (&lt;300m<sup>2</sup>)</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard "Mixed Use" module in P&amp;D Code</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
		<ul style="list-style-type: none"> <li>extension of existing residential building stock for a variety of uses</li> <li>Outdoor advertising which is designed so as not to dominate the appearance of the site and which has a coordinated appearance with other advertisements</li> <li>Non-residential use primarily to cater for local and neighbourhood population</li> <li>Low scale and low intensity development</li> <li>One storey non-residential development and two storey residential development</li> </ul>	<ul style="list-style-type: none"> <li>Shop (&lt;150m<sup>2</sup>)</li> </ul>	
Commercial (Main Rd)	Commercial	<ul style="list-style-type: none"> <li>Accommodates residential, minor servicing, commercial, community and office related activities which generate low traffic volumes</li> <li>Landscaping and residential built form enhances the local environment and forms an attractive gateway to the Blackwood centre</li> <li>Outdoor advertising which does not dominate the appearance of the site or streetscape and which is coordinated</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Community facility</li> <li>Consulting room</li> <li>Motor service repair</li> <li>Office</li> <li>Residential</li> <li>Shop</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard "Commercial" module in P&amp;D Code</li> <li>Bushfire Hazard overlay</li> </ul>
Commercial (Coromandel Parade)	Commercial	<ul style="list-style-type: none"> <li>Accommodates residential, minor servicing, commercial, community and office related activities which generate low traffic volumes</li> <li>Development which enhances the appearance of the zone</li> <li>Low intensity non-residential development which does not compete with or detract from the functioning of the adjacent district centre</li> <li>Retention and enhancement of the built form, landscaping and items of heritage significance in the zone</li> <li>Outdoor advertising which is designed</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Community facility</li> <li>Consulting room</li> <li>Motor service repair</li> <li>Office</li> <li>Residential</li> <li>Shop</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard "Commercial" module in P&amp;D Code</li> <li>Bushfire Hazard overlay</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
		to protect the visual effect of mature trees and the architectural qualities and heritage value of buildings and structures		
Commercial (South Rd)	Commercial	<ul style="list-style-type: none"> <li>Accommodates mixed service trade premises, light and service industrial, transport, wholesale, storage, small-scale office, indoor recreation, leisure and retail showroom uses</li> <li>Small scale office or low-impact use to provide a transition between South Road and residential zones to the east</li> <li>Development that is complementary and coordinated with planning objectives for the western side of South Road (In City of Marion)</li> <li>Enhancement of the appearance of the zone</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Consulting room (&lt;250m<sup>2</sup>)</li> <li>Light industry</li> <li>Motor service repair</li> <li>Office (&lt;250m<sup>2</sup>)</li> <li>Recreation / leisure facility</li> <li>Restaurant (&lt;300m<sup>2</sup>)</li> <li>Retail showroom</li> <li>Shop (&lt;150m<sup>2</sup>)</li> <li>Store</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard "Commercial" module in P&amp;D Code</li> </ul>
Industry/Commerce (Melrose Pk) <ul style="list-style-type: none"> <li>PA13</li> <li>PA14</li> </ul>	-	<ul style="list-style-type: none"> <li>Accommodates a range of industrial, business, commercial, warehouse and storage activities compatible with surrounding uses in the zone with small-scale offices and similar at the zone interface with residential areas</li> <li>Minimise potential for non-residential traffic and parking in nearby residential areas</li> <li>Development which is compatible with the function of arterial roads</li> </ul>	<ul style="list-style-type: none"> <li>Advertisements</li> <li>Bank</li> <li>Consulting room</li> <li>Crash repair workshop</li> <li>Light industrial</li> <li>Motor repair station</li> <li>Recreation area</li> <li>Store</li> <li>Warehouse</li> </ul>	<ul style="list-style-type: none"> <li>No direct SAPPL equivalent</li> <li>Consider standard "Commercial" module in P&amp;D Code</li> </ul>
General Industry	Industry	<ul style="list-style-type: none"> <li>Primarily accommodates industrial activities and the like where larger scale and more intensive activities occur and are separated from adjoining residential areas</li> <li>Minimise impact of non-residential traffic and parking in nearby residential areas</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Electricity sub-station</li> <li>Industry (not special or extractive)</li> <li>Light industry</li> <li>Minor public service depot</li> <li>Motor repair station</li> <li>Petrol filling station</li> <li>Pumping station over 75kW</li> </ul>	<ul style="list-style-type: none"> <li>No direct SAPPL equivalent</li> <li>Consider standard "Industry" module with "Infrastructure Policy Area" overlay in P&amp;D Code</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
			<ul style="list-style-type: none"> <li>Recreation area</li> <li>Service industry</li> <li>Service reservoir</li> <li>Store</li> <li>Temporary sewerage treatment plant</li> <li>Warehouse</li> </ul>	
Light Industry	Light Industry	<ul style="list-style-type: none"> <li>Primarily accommodates commercial activities and industries which operate on a small-scale and which do not generate heavy traffic and have minimal nuisance to adjoining development</li> <li>Tends to have an interface with residential development</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Electricity sub-station</li> <li>Light industry</li> <li>Minor public service depot</li> <li>Petrol filling station</li> <li>Pumping station over 75kW</li> <li>Recreation area</li> <li>Service industry</li> <li>Service reservoir</li> <li>Store</li> <li>Temporary sewerage treatment plant</li> <li>Warehouse</li> </ul>	<ul style="list-style-type: none"> <li>Potentially standard "Light Industry" module in P&amp;D Code</li> </ul>
Rural Landscape	-	<ul style="list-style-type: none"> <li>Seeks to retain rural, scenic landscape features, particularly its wooded environment</li> <li>Accommodates limited residential development which should be designed so as to complement the character of the zone</li> </ul>	<ul style="list-style-type: none"> <li>Advertisement</li> <li>Detached dwelling</li> <li>Domestic outbuildings or structures associated with a dwelling</li> <li>Dwelling alts &amp; adds</li> </ul>	<ul style="list-style-type: none"> <li>Very small zone</li> <li>Adjacent Primary Production type zones in Adelaide Hills Council and Onkaparinga Council &amp; HFZ in Mitcham</li> <li>Located within the new EFPA area</li> <li>Consider replacing with "Hills Face Zone" in P&amp;D Code ?</li> </ul>
MOSS (Recreation)	MOSS / Open Space	<ul style="list-style-type: none"> <li>Provides linear open space and regional open space for a range of passive and active recreational activities in both natural and landscaped settings as part of the Metropolitan Open Space System</li> <li>Conservation of natural vegetation</li> <li>Protection and enhancement of natural character of the area</li> <li>Protection of areas of scientific, geological, archaeological and cultural significance</li> <li>Delineates areas to be retained as</li> </ul>	<ul style="list-style-type: none"> <li>Farming</li> <li>Recreation areas</li> <li>Sporting club facility</li> <li>Structures associated with recreation area or sporting club facility</li> </ul>	<ul style="list-style-type: none"> <li>Flood Mapping overlay over portion</li> <li>Bushfire Hazard overlay</li> <li>Potentially standard "MOSS / Open Space" module in P&amp;D Code</li> </ul>

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Current Zone	SAPPL Equivalent Zone / Most Compatible Zone	Policy Intent (Current - Development Plan)	Envisaged Development Types (Current - Development Plan)	Comments
		statutory open space as part of the "Blackwood Park" residential development (yet to be developed)		
Hills Face	Hills Face	<ul style="list-style-type: none"> <li>An area where the natural character is preserved and enhanced (or re-established)</li> <li>A natural backdrop to the Adelaide Plains and a contrast to the urban environment</li> <li>Accommodates low-intensity agricultural activities and recreation areas</li> <li>Limited development of any type envisaged</li> </ul>	<ul style="list-style-type: none"> <li>Agricultural activities</li> <li>Detached dwelling (replacement only)</li> <li>Horticultural activities</li> <li>Recreation area</li> <li>Recreation facility</li> <li>Tourism facilities</li> </ul>	<ul style="list-style-type: none"> <li>Flood Mapping overlay over portion</li> <li>Bushfire Hazard overlay</li> <li>Potentially standard "Hills Face Zone" module in P&amp;D Code</li> </ul>
Special Uses	-	<ul style="list-style-type: none"> <li>Accommodates special public and private activities of an institutional or open character</li> </ul>	<ul style="list-style-type: none"> <li>Recreation area / facility</li> <li>Educational facility</li> </ul>	<ul style="list-style-type: none"> <li>Appears to be applied ad hoc (spot zoning?)</li> <li>Akin to "Community" zone in SAPPL</li> <li>Consider how to deal with sites which are spot zoned as Special Uses and whether this is appropriate zoning for the sites.</li> </ul>

**(B) Challenges or Issues with application of SAPPL content**

Zone	Challenge / Issue	Comment
State Heritage Area (CLG)	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	<ul style="list-style-type: none"> <li>Suggest a State-wide "State Heritage Zone" with policy areas over the individual S/H Areas (eg "Colonel Light Gardens", "Mount Torrens", "Pt Adelaide") be included in the P&amp;D Code</li> </ul>
Industry/Commerce (Melrose Pk)	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	
Rural Landscape	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	
Special Uses	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	
Historic (Conservation) Zone – Belair Village	<ul style="list-style-type: none"> <li>Historic Conservation Area in SAPPL</li> <li>No zone equivalent in SAPPL</li> </ul>	<ul style="list-style-type: none"> <li>HCZ is not entirely residential in nature so does not fall in the "Residential Character" zone in SAPPL</li> </ul>
Historic Cons. (Mitcham Village)	<ul style="list-style-type: none"> <li>Historic Conservation Area in SAPPL</li> <li>No zone equivalent in SAPPL</li> </ul>	<ul style="list-style-type: none"> <li>HCZ is not entirely residential in nature so does not fall in the "Residential Character" zone in SAPPL</li> </ul>
Institutional	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	
General Industry	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	
Rural Landscape	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	
MOSS (Recreation)	<ul style="list-style-type: none"> <li>No direct translation to SAPPL</li> </ul>	

**(C) City of Mitcham DP Policy not in SAPPL which should be considered for transition to PD Code (eg local characteristics, general policy)**

CoM Policy	Policy Intent	Comment
State Heritage Area (Colonel Light Gardens)	<ul style="list-style-type: none"> <li>Conservation and reinforcement of the heritage value and integrity of the original "garden suburb"</li> <li>Retention and conservation of existing housing stock</li> <li>Dwelling alterations &amp; additions in keeping with the existing character</li> <li>Various community and small scale commercial activities that reflect the original design and land use intent of the garden suburb</li> </ul>	<ul style="list-style-type: none"> <li>The Objectives, Statement of Historical Development, Statements of Existing and Desired Character, Statements of Heritage Value are all unique to Colonel Light Gardens</li> <li>Some of the Principles of Development Control within the zone are generic in nature and might apply to other historic conservation or heritage areas</li> <li>However, the majority are specific to Colonel Light Gardens and ought to be retained when the change to the P&amp;D Code occurs</li> <li>Some policies, if omitted or diluted, will have financial impacts on Council – eg allowing residents to access undeveloped rear laneways which is currently not allowed except in a very small area</li> </ul>
Residential (Hills)	<ul style="list-style-type: none"> <li>Residential development at low density – primarily single and two storey detached dwellings</li> <li>Maintain and enhance natural vegetation and features of Mt Lofty Ranges</li> <li>Development (land division) potential is based on the slope of land</li> <li>Allotment sizes range from 1,200m<sup>2</sup> to 2,000m<sup>2</sup> for detached dwellings</li> <li>Allotment sizes range from 700m<sup>2</sup> to 1,600m<sup>2</sup> for group dwellings</li> </ul>	<ul style="list-style-type: none"> <li>The character of the Hills (and some Foothills) areas is discernibly different from the plains and warrants having policies applied which recognise these differences</li> <li>These areas also have additional matters to consider including:- <ul style="list-style-type: none"> <li>access and egress in the event of a bushfire - given the current constraints it may not be appropriate to allow further division of land and additional dwellings</li> <li>land division – consider non-complying in P&amp;D Code?</li> <li>overlooking – there is a general acceptance that in areas of undulating topography (ie in the Hills areas) that some overlooking will occur and is tolerated more so than in plains areas</li> <li>protection of views &amp; vistas</li> <li>loss of vegetation, which to a large degree helps to characterise the Hills areas</li> </ul> </li> <li>Along ridgelines, the around Blackwood and Belair centres, there is opportunity for increased density to allow for aging in place</li> </ul>
Land division	<ul style="list-style-type: none"> <li>Creation of public reserve adjacent Sturt River, Brownhill Creek and Minnow Creek in the event that land that borders these waterways is divided.</li> </ul>	<ul style="list-style-type: none"> <li>Incremental establishment of linear parks along waterways enables better management of the waterways</li> </ul>

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CoM Policy	Policy Intent	Comment
Vegetation & Landscaping	<ul style="list-style-type: none"> <li>Council wide / zone wide – protection/enhancement/establishment of landscaping</li> </ul>	<ul style="list-style-type: none"> <li>Strong characteristic of the Mitcham Council area</li> <li>Important environmental benefit</li> <li>Policies across all zones have strong reference to vegetation and landscaping</li> <li>Direct link to the 30 Year Plan – Target 5 “A Green Liveable City”</li> </ul>
	<ul style="list-style-type: none"> <li>Street Trees</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact of additional allotments on street trees – additional allotments likely to require removal of street trees for access which has an environmental impact and an amenity/character impact</li> <li>Direct link to the 30 Year Plan – Target 5 “A Green Liveable City”</li> </ul>

**(D) Gaps in Development Plan or SAPPL? Which should be priorities for action?**

Gap	Comment	Priority for Action
Student accommodation	<ul style="list-style-type: none"> <li>The Courts recognise student accommodation as a particular type of accommodation with differing needs to other types of accommodation.</li> <li>Refer to <i>Morris v City of West Torrens</i> [2011] SAERDC 32 “.....reduced amounts of carparking, smaller rooms or apartments and communal areas intended to promote or facilitate social interaction. A management regime, which includes limits on car ownership or use, rules to limit noise to avoid nuisance to other residents and neighbours, onsite supervision...”</li> </ul>	<ul style="list-style-type: none"> <li>Highly relevant and topical for Mitcham Council, having two universities located in the council area</li> <li>The area around the Flinders University is located within an area identified as having potential for significant change in Mitcham Council’s Spatial Vision</li> </ul>
Other types of accommodation (eg short term accommodation, step-down associated with hospital)	<ul style="list-style-type: none"> <li>Step-down accommodation would be staffed and so may be akin to the nature of “supported care”</li> <li>Short term accommodation suitable for visiting staff of hospitals and university, families of students and patients - may be akin to a hotel / tourism accommodation</li> </ul>	<ul style="list-style-type: none"> <li>Highly relevant and topical for Mitcham Council, having two hospitals and two universities and located in the council area</li> <li>The area around the Flinders Medical Centre, Flinders Private Hospital and Flinders University is located within an area identified as having potential for significant change in Mitcham Council’s Spatial Vision</li> <li>Direct link to 30 Year Plan – Target 6 “Greater Housing Choice”</li> </ul>
Site coverage & stormwater management	<ul style="list-style-type: none"> <li>Relationship between site coverage and onsite stormwater management</li> <li>The greater the site coverage the greater the need for onsite stormwater management</li> </ul>	<ul style="list-style-type: none"> <li>Existing infrastructure will not cope with additional dwellings/built form (and the resultant stormwater runoff)</li> <li>Controls within P&amp;D Code ?</li> <li>Direct link to 30 Year Plan – Target 5 “A Green Liveable City”</li> </ul>

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**(E) High-level policy issues for consideration in PD Code library**

Policy Issue	Comment
Residential Zones – Allotment Size	<ul style="list-style-type: none"> <li>How will allotment size be dealt with in P&amp;D Code Library if a blanket Residential Zone is to apply across the metropolitan area?</li> <li>Allotment size is a critical factor in determining the character of an area – for example compare Northgate and Hawthorn</li> <li>Arguably 80m<sup>2</sup> allotments (or, conversely, 500m<sup>2</sup>) which might be appropriate in one area are not appropriate in another in terms of character</li> <li>Benefits of performance assessment vs deemed to satisfy within City of Mitcham</li> <li>If utilising LMAs as protection for “special character” rather than applying an overlay, what impact if the LMA is extinguished?</li> </ul>
Supported / aged care accommodation	<ul style="list-style-type: none"> <li>Should policy differentiate between the different types of supported accommodation – arguably residents in Independent Living Units (ILUs) have different needs to those in high care facilities?</li> <li>Does supported care include staffed accommodation for people with mental health issues or hospital step-down accommodation?</li> </ul>
Hills Face Zone / Environment & Food Production Area (EFPA)	<ul style="list-style-type: none"> <li>Maps of the EFPA indicate that it overlaps the existing Hills Face Zone in the City of Mitcham (and elsewhere). Is it intended that the EFPA replaces the HFZ in the P&amp;D Code? If so, what implications does this have? It is considered that the policies currently applying the HFZ are appropriate to carry over to the P&amp;D Code.</li> </ul>

**(F) Other Notes**

Matter		Comment
Statutory Referral to CFS	Land Division	<ul style="list-style-type: none"> <li>It would be useful to have applications for land division within High Bushfire areas referred to the CFS at the land division stage, rather than the built form stage so that matters such as accessibility and appropriateness of additional dwellings can be assessed at this point</li> </ul>
Code Complying / Deemed to Satisfy & Statutory referral to State Heritage	State Heritage Area (Colonel Light Gardens)	<ul style="list-style-type: none"> <li>There may be opportunity to include some forms of minor development (eg swimming pools &amp; safety fencing) as code complying / deemed to satisfy</li> <li>Potential to remove requirement to refer some types of development to State Heritage Unit if complying/deemed to comply</li> </ul>
Earthworks	Development Regulations Schedule 2, A1, 1(1) (2), 2	<ul style="list-style-type: none"> <li>Consider removing the earthworks clauses from Schedule 2 - Additional Acts &amp; Activities Constituting Development. The clauses effectively mean that all development in the nominated areas becomes Category 3 – unless the earthworks are deemed to be “minor”, which is a subjective judgement.</li> </ul>

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Matter	Comment
	<p>Council has experienced inconsistencies as a result. It is considered that the Act sufficiently captures “development” and removes the uncertainty and inconsistency around the Schedule 2 clauses.</p> <ul style="list-style-type: none"> <li>• Would need to ensure there is no unintended consequence of doing so though.</li> </ul>

**(G) Inconsistencies in Development Plan (Section 29)**

Inconsistency	Comment												
<p>Residential (Hills) PDC 3 &amp; 4</p> <p>2 Land division creating a “hammerhead” or similar shaped allotment should only be undertaken where:</p> <p>(a) the area of the allotment - exclusive of the portion of commonly referred to as the “handle” (that portion which is intended to be used primarily for access only) - is not less than that set out in principle of development control numbered 3 of this zone;</p> <p>(b) where the main portion of the allotment has a frontage or outlook to adjoining open space, a creekline, or other land with an open or natural character; and</p> <p>(c) that portion of the hammerhead allotment which is intended to be used primarily for access (ie the “handle”) is not less than six metres wide at any point.</p> <p>3 Sites for detached dwellings and land division creating residential allotments should satisfy the following minimum site dimensions applicable to the gradient of each proposed site –</p> <table border="1"> <thead> <tr> <th>Gradient of Site</th> <th>Minimum Width of Site (metres)</th> <th>Minimum Area of Site (square metres)</th> </tr> </thead> <tbody> <tr> <td>1:8 or less</td> <td>12</td> <td>1200</td> </tr> <tr> <td>between 1:8 and 1:4</td> <td>21</td> <td>1500</td> </tr> <tr> <td>greater than 1:4</td> <td>30</td> <td>2000</td> </tr> </tbody> </table>	Gradient of Site	Minimum Width of Site (metres)	Minimum Area of Site (square metres)	1:8 or less	12	1200	between 1:8 and 1:4	21	1500	greater than 1:4	30	2000	<ul style="list-style-type: none"> <li>• Ambiguous if read together</li> <li>• While not an inconsistency it does lack clarity</li> <li>• PDC2 could be amended to include the details currently included in PDC, while ensuring that the changes do not alter the effect of either policy in any way.</li> </ul>
Gradient of Site	Minimum Width of Site (metres)	Minimum Area of Site (square metres)											
1:8 or less	12	1200											
between 1:8 and 1:4	21	1500											
greater than 1:4	30	2000											
<p>Commercial (Main Road) PDC 14 Non Complying Signage</p> <p>“Advertisements on side or rear walls about or are visible from residential areas”</p>	<ul style="list-style-type: none"> <li>• The wording in the advertisement section is not clear – wording re “abutting” needs to be rephrased</li> <li>• Changes to the wording to provide greater clarity could be made, while ensuring that the changes do not alter the effect of either policy in anyway.</li> </ul>												
<p>Council Wide PDC 17 – Private Open Space</p> <p>17 Dwellings should be provided with sufficient private open space to accommodate recreation and leisure needs for future occupants of the dwelling as well as the service functions of clothes drying and domestic storage. Private open space should be fenced</p>	<ul style="list-style-type: none"> <li>• Incorrect reference to PDC34 in regards to solar access (PDC34 actually refers to public roads).</li> <li>• This does appear to constitute removing irrelevant material or even possibly an inconsistency and therefore could be justified under Sect29(2)(b)(ii).</li> <li>• Changes should not alter the effect of the underlying policy.</li> </ul>												

<p><i>or otherwise screened from view from the street, and located so as to receive reasonable access to direct sunlight.</i></p> <p><i>In particular, private open space should meet the following requirements:</i></p> <p><i>(f) the private open space area is located and designed to take advantage of winter sunlight and available shade in summer, in accordance with principle of development control numbered 34.</i></p>	<ul style="list-style-type: none"> <li>Is it a matter of changing the reference to PDC31 (instead of PDC 34)</li> </ul>
<p><b>Commercial (South Road) Zone PDC 5</b></p> <p><i>5 Building styles and finishes may be varied, provided enhancement to the visual qualities of the locality would be achieved and all development should meet the design principles in <b>general principles of development control numbered 58.</b></i></p> <p><b>Mixed Use (Goodwood) Zone PDC 6</b></p> <p><i>6 The architectural style of building development should be in context and sympathetic with any predominant styles in the locality and all development should meet the design principles in <b>general principle of development control numbered 58.</b> Development in those localities with consistent building character, should endeavour to retain and reinforce the key aspects.</i></p> <p><b>Council Wide PDC 58</b></p> <p><i>58 Land should not be divided unless provision is made for safe and convenient legal access from any proposed allotment to the carriageway of an existing or proposed public road.</i></p>	<ul style="list-style-type: none"> <li>Incorrect reference to PDC 58 in regards to building styles and finishes (PDC58 refers to land division).</li> </ul>
<p><b>Council Wide PDC 77(g)(i)</b></p>	<ul style="list-style-type: none"> <li>The Building Code appears to be in direct conflict with the disabled provisions within the Development Plan being PDC 77 (g) (i) -Movement of People and Goods.</li> <li>The Building Code requires one (1) disabled space to be provided in every fifty (50) spaces provided on-site for a class 6.</li> <li>However in the Development Plan if twenty five (25) spaces or more are to be provided, then at least one (1) space is to be allocated for the disabled.</li> </ul>
<p>Local heritage item 1 Norseman Avenue, Westbourne Park</p>	<ul style="list-style-type: none"> <li>States address as "1 Norseman" which is a private dwelling – it is actually 59 Norseman</li> </ul>
<p>Local heritage item 62 Wattlebury Road, Lower Mitcham</p>	<ul style="list-style-type: none"> <li>Change address to 3 Surrey as front block sub-divided (62 Wattlebury)</li> </ul>
<p>Local heritage item 53 Grange Street, Lower Mitcham</p>	<ul style="list-style-type: none"> <li>Grange Road frontage subdivided from Olive Villa House. Subdivided blocks will need to lose the heritage status – address may need changing to 8 Crowder Street</li> </ul>
<p>Historic (Conservation) Zone – Mitcham Village</p>	<ul style="list-style-type: none"> <li>Page 141 – incorrect spelling – under Local Heritage Places 13 Welbourne Street change "fromer to "former" bakery and house</li> </ul>

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Historic (Conservation) Zone – Mitcham Village	<ul style="list-style-type: none"> <li>Page 141 – incorrect spelling – under Local Heritage Places change “Maitland Street, former Newey’s Stables (Scout Hall)” to “Maitland Street, former Newey’s Stables (Scout Hall)”</li> </ul>
Historic (Conservation) Zone – Mitcham Village	<ul style="list-style-type: none"> <li>Page 141 – incorrect spelling – under Other Contributory Buildings and Items change “17 to 19 Albe Street” to “17 to 19 Albert Street”</li> </ul>
Historic (Conservation) Zone – Mitcham Village	<ul style="list-style-type: none"> <li>Page 142 – incorrect spelling – under Design and Siting of Development change “Odginal unpainted brickwork or stonework should be preserved” to “Original unpainted brickwork or stonework should be preserved”</li> </ul>
Table Mit/3	<ul style="list-style-type: none"> <li>Could you please include the CT references for these items (the same as Local Her?)</li> </ul>
54A Turners Avenue Coromandel Valley	<ul style="list-style-type: none"> <li>Swinton House (LHP) subdivided and new allotments erroneously have local heritage listing (needs administrative clean up)</li> </ul>
Text reference needed to advise of Adey Road HCPA Map	<ul style="list-style-type: none"> <li>No reference to MAP Mit/36 in Adey Road PDC’s</li> <li>Technically you could include a reference Under Sect29(2)(a) as amending the wording to provide greater clarity, would change the form of the PDC without altering the effect of the policy in anyway.</li> </ul>
Incorrect Local Heritage Place Address	<ul style="list-style-type: none"> <li>Table Mit/4. 35 Coromandel Parade, Blackwood should read 37 Coromandel Parade</li> </ul>
Incorrect spelling of Local Heritage Place address	<ul style="list-style-type: none"> <li>Table Mit/4. 14 Angas Road, Hawthorn is incorrectly spelt ‘Angus’</li> </ul>
Incorrect description of Local Heritage Place	<ul style="list-style-type: none"> <li>Table Mit/4. 16 Anderson Avenue, Torrens Park – Description includes reference to Glenburnie House, which is not part of this listing (and has a separate listing under 2 Chalk Place).</li> <li>Description should be amended to read “Former stables associated with Glenburnie House; External form and fabric of historic building”</li> </ul>



20 April 2018

Department of Planning, Transport and Infrastructure  
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ADELAIDE SA 5001

By Email : [DPTI.PlanningEngagement@sa.gov.au](mailto:DPTI.PlanningEngagement@sa.gov.au)

Dear Sir/Madam

**FUTURE LAND USE DEFINITIONS & CLASSES TECHNICAL DISCUSSION PAPER –  
RESPONSE**

Thank you for the opportunity to respond to the *Future Land Use Definitions & Classes Technical Discussion Paper*.

The Administration has considered the technical discussion paper and makes the following response to the Department's questions:-

**What improvements could be made to better reflect today's policy and development trends?**

- The use of plain English for land use definitions is essential to provide a strong and clear foundation for the Planning & Design Code.
- Greater clarity is required for a range of existing terms and definitions, including:-
  - "structure" – recent legal advice has suggested that a bitumen carpark associated with a hotel is a "structure", which contradicts previous advice
  - "curative science" – alternative medicine is now becoming mainstream – there may be a blurred line between "curative science" and "personal services establishment" (eg massage)
  - "storey" – clarity is required on what spaces this precludes/includes – basements, attics, mezzanine etc
- "Amusement Machine Centre" is out of date and may be better included within the definition of indoor recreation centre.
- Home activity – the definition of a home activity, in the context of contemporary employment, will continue to be an important one. In light of the recent Local Nuisance and Litter Control legislation, the determination of any detrimental effect on amenity of an area should be made by the council, not neighbours. Greater flexibility in the use of the dwelling for employment purposes should be allowed for – for example, not by defining an arbitrary square metre area but by ensuring that the employment use is ancillary to the main residential use. It is considered that an assessment should be based more on the impact of the ancillary use of the dwelling for employment purposes, rather than the internal use of particular areas (eg visitor parking, deliveries, noise).

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Future Land Use Definitions & Classes Technical Discussion Paper – Response

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- The term “Motel” is out of date and may be better included within a new definition encompassing all types of tourist accommodation.
- The term “petrol filling station” appears to have been usurped by integrated developments (eg On-The-Run developments) – rarely do these types of developments fit within the current definition of petrol filling station.
- The various dwelling definitions should be consolidated and the functional use of the building elevated in importance. This could resolve issues around land division and assessment sequencing.
- Aged/supported care accommodation – an issue which is increasingly becoming more pressing as our population ages and societal desires shift from the traditional “nursing home”. Accommodation for the aged (or incapacitated) should not be treated on their built form type per se (eg group dwellings or residential flat buildings), but rather should be based on functional use. Consolidating dwelling types and having a separate land use definition for aged/supported care would assist to resolve this. A form of aged/supported care is a second dwelling on a site (eg granny flat) – which could either be supported by the occupants of the main dwelling, or alternatively by NDIS providers (ie doesn't necessarily need to be dependent accommodation).
- Is “dependent (relative) accommodation” different to “second dwellings” (and should it be?). Second dwellings on a site may be part of the solution to infill development/affordable housing, however there may be community concern about the impact of second dwellings.
- Earthworks should be removed from the definition of development where it is ancillary to other types of land use.
- Tourist accommodation – many different forms of tourist accommodation exist, including serviced apartments, motels, hotel, Airbnb, bed & breakfast, resort, self-contained accommodation. Tourist accommodation could be defined as temporary accommodation for less than 3 months for use by tourists. The definition could extend to include associated buildings (office, caretaker's residence, recreational facilities).

**What gaps or areas of conflict are there within our current definitions?**

- Affordable housing – which has become part of the vernacular and is referenced in policy but is not defined in the Regulations.
- Student accommodation – is a recognised use in its own right, but is not defined. Student living, including informal share-house living, is prevalent, particularly around universities.
- Alternative or renewable energy farm/facility – the shift to renewable energy sources will result in the requirement for alternative energy facilities in urban and regional settings and will include wind, solar, geothermal, hydro, biomass and the like.
- Childcare centre – a use in its own right which is different to an educational establishment but is undefined. Given the prevalence and potential impacts of the use, a definition is required.
- Rural activity – while horticulture, farming and intensive animal keeping are defined, there is a raft of rural activities which are not, including agriculture, viticulture, aquaculture, wholesale nursery and forestry. It may be of value to define other types of rural activities.

Future Land Use Definitions & Classes Technical Discussion Paper – Response

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- Rural activity building – to replace “farm” building so as to encompass all types of rural activities
- Small bar / small entertainment place (eg wine bar, cocktail bar) – these are becoming more prevalent and are quite different in terms of impact than a hotel and so should be clearly defined.
- Integrated development – eg petrol filling stations with associated takeaway food, retail, etc, or a winery with primary production function, cellar door retail, restaurant
- Restaurant – currently a restaurant falls under the definition of “shop” but is considered to be a use in its own right and should therefore be defined.
- Recycling facility – in light of recent international decisions which reduce our ability to export materials for recycling, there will become a need to develop recycling facilities in our urban and regional areas – such a facility requires definition.
- Pet daycare/pet hotel – a use which is different to intensive animal keeping or boarding kennels (which also are undefined) and are likely to become more prevalent to keep up with societal changes.
- Place of worship – referenced in policy but not defined. Contemporary places of worship are not confined to purpose-built buildings, but also are within existing buildings used for other purposes, and outdoors.
- Seasonal agistment – in peri-urban areas seasonal agistment of livestock (such as goats and sheep) is frequently employed to manage allotments on steeply sloping terrain. Different to intensive animal keeping, but with its own impacts such as noise and odour.
- “Shop” – there needs to be greater clarity on the different genus’ of “shop”. Remove “bulky goods outlet/retail showroom” from the definition of shop, given that use is separately defined.
- The uses listed in “Service Trade Premises” should be included in “bulky goods outlet/retail showroom” definition and Service Trade Premises removed.

**What land uses and development types might function better if grouped together?**

- Rural activity
  - Agriculture
  - Horticulture
  - Viticulture
- Dwellings
  - Detached dwelling
  - Semi-detached dwelling
  - Group dwelling
  - Residential flat building
  - Row dwelling
  - Multiple dwelling

Future Land Use Definitions & Classes Technical Discussion Paper – Response

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- Tourist Accommodation
  - Serviced apartments
  - Hotel
  - Motel
  - Bed & Breakfast
  - Airbnb
  - Resort
  - Self-contained
- Community Use
  - Community centre
  - Library
  - Child care centre
  - Cultural/arts facility
  - Cemetery
  - Educational establishment
  - Health facility
  - Place of worship

**How can we present the concept of land use classes in the Code and reduce the number of change of use applications?**

- The concept of land use classes where the use of premises by designated uses within particular a class precludes the requirement for a change of land use application is considered to be a reasonable approach on face value.
- However, it is considered that further detailed investigation is required to determine what uses might have similar impacts in terms of amenity, parking, noise, etc and which would agglomerate well.
- Without undertaking such investigation, at first glance class bands could include:-
  - Shops
  - Professional Services
  - Health & Medical services
  - Rural
  - Community Activities

Please note that these comments are by the Administration and have not been endorsed by the Council.

Yours Sincerely



CRAIG HARRISON  
GENERAL MANAGER – DEVELOPMENT SERVICES & COMMUNITY SAFETY



24 April 2018

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Dear Sir/Madam

**ACCREDITED PROFESSIONALS SCHEME DISCUSSION PAPER – RESPONSE**

Thank you for the opportunity to respond to the *Accredited Professionals Scheme Discussion Paper*.

The Administration has considered the discussion paper and makes the following comments:-

- Accreditation Levels

*Assessment Manager*

- Given the importance of the Assessment Manager's role within a council, there will need to be options available if the Assessment Manager is absent for a length of time (eg leave, secondment, resignation), particularly if the absence is unplanned. If there is no other appropriately qualified person within an organisation to step into the Assessment Manager role in such an instance, can one be "borrowed" from another council? This may be a significant issue for regional councils and if registration/accreditation of internal candidates for the position takes some time.
- The accreditation levels appear to be role based - for example, functions of an Assessment Manager include "managing staff". This implies that a Council should only have one Assessment Manager, in which case inefficiencies will be encountered when the Assessment Manager is responsible for signing off all performance based assessments. Councils could foreseeably employ more than one person at the Assessment Manager level, and their functions within Council managed through position descriptions, rather than the Accreditation Scheme.

*Assessment Panel Member*

- Given the significance of decision-making by CAP members under the PDI Act, it is considered that greater experience than two years should be required – five or more years is suggested.
- The Chair of the CAP should have additional experience/demonstrated competencies in governance/managing meetings and relevant planning legislation.

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*Accredited Planners*

- Clarity is required around how cadets and graduates without the required one year of experience fit within the scheme. Within a council setting (where greater knowledge sharing and mentoring occurs) one year's experience may not be required in order to be able to sign off simple "deemed to satisfy" developments – we suggest six months' experience may be sufficient. It is assumed that, within this period of gaining experience, assessments may be undertaken by the cadet or graduate and co-signed by the Assessment Manager. This could prove onerous on small councils and make employing inexperienced planners less attractive.
- Where the Accredited Professional is a sole operator without knowledge sharing/mentoring opportunities, the required level of experience should be greater than 1 year, particularly if there is no recourse by a council to question the decision.

*Land Division*

- Clarity is required around who is able to assess land division proposals for more than four allotments and/or a public road.
- Accreditation through the Australian Institute of Conveyancers SA (AICSA) – Certified Practising Conveyancer could be an alternative to SSSI certification.

*Building*

- Clarity is required around who decides what constitutes "relevant" experience/qualifications (Level 4 Building).
- Accreditation Method
  - The DPTI accreditation pathway should correspond with existing accreditation pathways (eg PIA and AIMS/RICS), particularly in relation to the requirements of an Assessment Manager, and should include demonstrated competencies, not simply years of experience.
  - The cost of accreditation via DPTI should not exceed that of existing accreditation pathways.
- Professional Indemnity Insurance
  - Clarity is required about whether local government staff and CAP members will be covered by the Mutual Liability Scheme.
- Allied Professionals
  - Members of other existing professional organisations could also be included as CAP members, eg Australian Institute of Landscape Architects, Law Society of SA, Australian Institute of Conveyancers.
  - If allied professionals become Assessment Panel Members, will there be a requirement that they undertake additional continuous professional development (CPD) in topics relates directly to planning subjects? This may be onerous on professionals who already undertake professional development.
  - The scheme should not discourage or be overly arduous for practicing professionals in relation to the cost of professional indemnity insurance, professional development requirements, accreditation and the time taken to attain these.

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- Cost
  - The cost of accreditation and training (and the time required to undertake the training) may deter some who would otherwise nominate for membership of a CAP. This may result in CAP membership being disproportionately skewed in their make-up.
  - In order to attract high calibre staff and CAP members, Councils may be required to bear the costs of accreditation and training for staff and CAP members which could result in a significant ongoing budget commitment.
- Auditing & Complaints
  - This aspect is critical to the success of the accreditation scheme.
  - Greater fleshing out and discussion of this aspect of the scheme is required.
  - Clarity is required around a number of aspects, including
    - o the mechanism for a Council (or others) to make a complaint about a private certifier
    - o who undertakes the audits and what qualifications/accreditations they will have
    - o what audits will include - record keeping, timeframes, decision-making process and decision outcome (decisions won't always be appealed so can't expect that Courts will always correct inappropriate decisions)
- Policy work
  - The Accredited Professional Scheme is aimed at Development Assessment Planners. While the volume of policy work will diminish under the PDI Act it will still be an important aspect of the planning system. What accreditation requirement will there be for policy planners or planners not undertaking development assessments?
- Expert technical advisers
  - Is there to be stipulation about the qualifications of those engaged by Councils to provide expert technical advice – eg significant tree removal - report by qualified arborist?
  - Will independent experts providing advice to councils or CAP be required to be accredited under the scheme?
- Infrastructure Scheme
  - Does a scheme coordinator require accreditation?
- State Commission Assessment Panel (SCAP)
  - Members of the SCAP should be subject to the accreditation process also.

Please note that these comments are by the Administration and have not been endorsed by the Council.

Yours Sincerely



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GENERAL MANAGER – DEVELOPMENT SERVICES & COMMUNITY SAFETY