



CITY OF  
ADELAIDE

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Dr Matthew Butlin  
Chair and Chief Executive  
South Australian Productivity Commission  
GPO Box 2343  
ADELAIDE SA 5001

Dear Dr Butlin

### **Development Referrals Review**

Thank you for the opportunity to provide input to this review. We understand the LGA has responded on behalf of local government, however we draw your attention to additional matters which are specific to development referrals for the City of Adelaide.

#### Information Request 3.4 – Road Network Referrals and Information Requirements

The “Traffic Generating Development“ Overlay of the Planning and Design Code does not spatially apply to roads managed by the City of Adelaide. As you can appreciate many of these roads carry significant volumes of vehicles and support a relatively high number of pedestrians and cyclists, however there is no referral mechanism to the Department of Transport (DIT). Referrals add valuable time to assessment timeframes allowing adequate consideration to be given to what are often complex matters.

Following on from this, the Planning and Design Code directs development in the City of Adelaide that has a value exceeding \$10 million to be assessed and determined by the State Planning Assessment Panel (SCAP). Key issues around referrals and transport for these developments include:

- No referrals to DIT regarding traffic and transport exist in the new system for development in the City of Adelaide.
- A referral to the CEO at the City of Adelaide enables public realm/infrastructure comments which must be provided to SCAP within 15 business days (or the comments will not be considered during their assessment).
- Considering the above points, it is unknown how SCAP would obtain relevant information to inform traffic and transport related considerations of an application.

In relation to referrals for helipads and referrals for development which could affect the operation of a helipad in the City of Adelaide, there are some opportunities to imbed continuous improvement and better practices in the referral process. The following points are raised for your consideration:

- Referrals to Adelaide Airport are required when triggered by the Airport Building Heights (Regulated) Overlay.
- The Code does not provide a trigger for referral to the Minister administering the *Airports Act 1996* of the Commonwealth for development which may affect the operation of a helipad (strategic or otherwise). There could be additional

The City of Adelaide acknowledges the Kaurna people as the Traditional Owners of the Country where the city of Adelaide is situated, and pays its respect to Elders past, present and emerging.

considerations to height (e.g. proximity, potential windshear) for helipads. It is unclear whether “Building Near Airfields Overlay” PO 1.3 includes helipads and/or which regulatory body would provide referral advice or direction.

- Helipads of strategic importance have not been identified spatially in the Planning and Design Code, e.g. emergency/hospital helipads.
- Referrals are not yet provided for development which could involve increased use of airspace, via helicopters, drones, or remotely piloted aircraft.

Referrals should not necessarily be viewed as a burden on the development assessment process. Referrals should be viewed as an opportunity to identify crucial information and highlight issues to be addressed and overcome as early in the assessment process as possible, thereby saving time and money for both the proponent and any assessing agencies.

I would be happy to meet with you to discuss our submission in more detail, if required. Please contact me on 8203 7380 or [h.dand@cityofadelaide.com.au](mailto:h.dand@cityofadelaide.com.au)

Kind regards



Helen Dand  
Manager, Assessment

