

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

John Stimson
Presiding Member
Expert Panel
Planning System Implementation Review
GPO Box 1815
Adelaide SA 5001

16 December 2022

Dear Mr Stimson

Thank you for the opportunity to make a submission to the Planning System Implementation Review.

I write this submission based on three decades experience teaching and researching in urbanisation, urban planning and transport. I co-founded the Master of Planning and Master of Planning (Urban Design) programs at the University of Adelaide and am currently an Adjunct Senior Research Fellow at the University of South Australia. I have practical experience of the development assessment process as a member of Development Assessment and Council Assessment Panels.

My submission focuses on some of the issues in the Planning and Design Code rather than higher level problems with the Planning System.

Yours sincerely



Dr Jennifer Bonham

Infill

There is widespread community agreement that urban infill is important. Among other things, it can increase housing choice, limit development on the urban fringe, and reduce costs associated with expanding infrastructure and services into new areas.

The main issue with urban infill is current practices. Key concerns include: poor quality design and materials; standardisation of developments and lack of regard to surrounding neighbourhoods; increase in impermeable surfaces with the associated loss of greening (trees, shrubs), increased stormwater runoff and increased heat-loading; poor street frontages; impact on street trees where double cross-overs have been approved. The on-balance development assessment approach means PDC Performance Outcomes and associated criteria around landscaping, deep soil requirements, street frontages, cross-overs and so forth can be readily compromised in the approval process (see Photos 1 and 2).

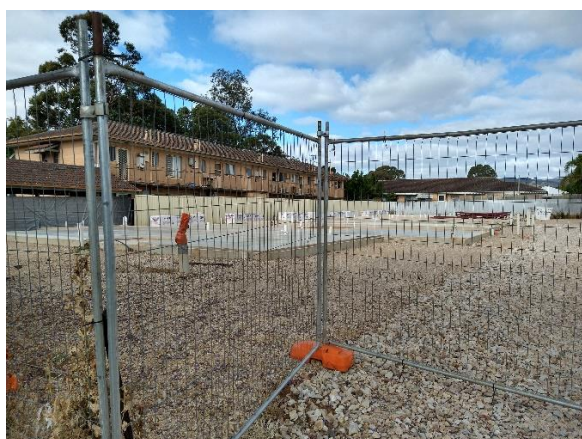


Photo 1



Photo 2

Development on Fullarton Road approved under the PDC. Provides no space for deep soil or landscaping on individual sites.

Further, while every development (including extensions and detached houses) must incorporate higher environmental (and social) sustainability standards, this is especially important for urban infill. Improving environmental standards will reduce long-term operational costs of all buildings and help foster more positive community attitudes toward urban infill. Victorian local governments have produced 'Fact Sheets' for 10 key dimensions of environmentally sustainable buildings.

- Indoor Environment Quality – e.g. internal thermal mass, noise mitigation
- Energy Efficiency – e.g. orientation, eaves, shading
- Water Efficiency – e.g. water efficient fittings
- Stormwater management – water capture, reuse, infiltration, detention
- Building Materials – embedded energy, thermal performance, colour
- Transport – unbundling car parking, secure bicycle parking, share vehicle parking
- Waste Management – avoid, reduce, reuse, recycle
- Urban Ecology – green space, tree canopy, biodiversity
- Innovation – contemporary best and new practice, continuous improvement
- Construction and Building Management – efficient methods, low emissions

Creating 'fact sheets' was recently supported by the City of Unley and they are useful for both developers and consumers but they should be seen as a 'first step'. Environmental standards for

development must be incorporated into Planning Regulations to ensure they are not readily compromised in the 'on-balance' assessment process.

Car Parking

Car parking is a symptom of a much larger problem. A key argument for urban infill is related to transport. Increasing housing, and hence the number of people, within the existing urban footprint should increase the viability of public transport services. Placing people in closer proximity to activity centres should reduce travel distances and facilitate access on foot or bike rather than by car.

However, a combination of factors including:

- poor siting of infill development (e.g. at a distance from services and facilities),
- inefficient public transport (e.g. lack of high occupancy vehicle lanes so buses must compete on heavily trafficked roads),
- lack of State Government investment in walking and cycling infrastructure (leaving it all to local government),

undermines the transport arguments for infill. This failure ultimately results in new residents maintaining high levels of car use and parking on local streets. Confronted with additional traffic and parking in their streets, outraged local communities demand additional on-site parking in new developments.

Instead of a knee jerk response to change parking regulations, there must be close co-ordination between the departments of Planning and Transport when identifying infill zones. Urban infill should be located first and foremost adjacent to centres with high levels of services and facilities to obviate the need for car use. Where infill is located on main roads, those roads should have existing or potential High Occupancy Vehicles lanes to facilitate bus priority and efficient public transport journeys. Infill development should also be in close proximity to high quality cycling routes.

All multi-unit developments should provide parking spaces for share vehicles and this can be traded against car parking requirements. These developments should also include requirements for secure, safe, easily accessible bicycle parking.

Expanding how car-parking off-set funds can be spent is appropriate and should also include participation in share vehicle schemes and fixed route community bus services. DIT should be taking the lead on public and active transport rather than leaving it to local governments to 'work it out.'

Trees

Recent reports by Dean Nicolle, the Conservation Council of South Australia, and the University of Adelaide detail the importance of trees and the eco-system services they provide. I support the legislative and regulatory changes they recommend, in particular:

- changes to tree circumference and height that determine its status as a significant or regulated tree
- increasing the economic value attached to significant and regulated trees and the penalty for tree removal and tree damaging activity
- removing the obligation for a tree to 'make a visual contribution' to justify its retention

- implementing a bond system to protect significant and trees on land that is being re-developed

In addition to these measures, developers and property owners should be strongly encouraged to retain trees that do not qualify as significant or regulated trees. Sympathetic design and construction management can ensure trees are retained and property owners do not have to wait years for new plantings to grow. This could be addressed at the outset of the development application process, when property owners and developers commence discussions with planners about extensions, swimming pools or redevelopment of sites.

The tree planting requirements in the Planning and Design Code are manifestly inadequate. The property depicted in photos 1 and 2 are an example of the lack of space available for individual home owners to plant trees or put in any landscaping in their own 'backyards' (such as they are!). The PDC has deep soil requirements but this is meaningless if the deep soil area is not appropriately located on the site. The minimal requirements for tree planting do not address heat loading of individual dwellings and this impacts neighbouring properties. In this instance, the neighbouring property, a 2 storey 1960s flat building does not have an attractive street frontage but it is likely to house as many people as the new build next door and has approximately 40% tree canopy on site (see Image 1 and Photo 3). It is home owners, not developers, who pay the long term costs of energy consumption (with air conditions) and health if they cannot plant trees on their property.



Image 1: Satellite image of 1960s flat building on Fullarton Road



Photo 4: 1960s flat building Fullarton Road

Character and Heritage

Detailed *Desired Character Statements* in the former Development Plans were central to protecting the cohesiveness of neighbourhoods and the building stock of different eras (Victorian, Edwardian, Inter-war, post-WWII). *Desired Character* statements recognised differences in spatial context across cities and towns and provided the framework for diverse and richly textured urban areas. The name itself – **Desired Character** – made it clear how the area should be developed into the future. The PDC *Character Area Overlay* 'identifies localities that comprise valued character attributes.' The *Character Area Statements* consist of a list of elements (era, allotments etc.) with one-line descriptions (occasionally more) of each element. These elements might be 'valued' but, in the end, there is no commitment to retaining them or the cohesiveness and character of the neighbourhood into the future. The *on-balance* assessment process means elements can be compromised in individual developments with the overall character of a locality being eroded over time. Re-introducing *Desired Character* statements would provide developers and planners with a clear description of what is expected in each area.