



Response:

People and Neighbourhoods Policy discussion paper February 2020

To:

DPTI, Planning reform

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From:

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The South Australian Active Living Coalition

The Heart Foundation has auspiced the South Australian Active Living Coalition (the Coalition) since 2007.

The Coalition is a collaboration between key Government and non-Government organisations. The purpose is to advocate for and support the integration of active living principles into the built environment.

Active living is defined as a way of life that integrates physical activity into daily routines. Our current patterns of living, that rely less on local facilities and opportunities and more on dispersed and distant centres of work, education, shopping and recreation that are typically only accessible by private car have led to a reduction in opportunities to be physically active in daily life and have contributed to increasingly sedentary lifestyles.

Introduction

Thank you for the opportunity to comment on the People and Neighbourhoods Discussion Paper. “People and Neighbourhoods” is a welcome outline of the Code. Its existence reflects the significant positive shift in planning policy knowledge and settings, meaning that health and wellbeing and active living of people are acknowledged and provided for in ways that could not have been envisaged twenty years ago.

Nevertheless, the Coalition does have some concerns that the new planning system does not go far enough in seeking to improve the liveability of South Australia, or facilitate healthy planning, and so improve the quality of life for people. Instead we fear the new system might adversely affect it and serve to reduce the capacity of our urban centres to respond to climate change, and indeed contribute to reducing active living and increasing health inequities in some of our most vulnerable communities.

“The quality of local neighbourhoods is a foundation of the extent to which they support health and sustainability. A well designed and connected ‘liveable’ neighbourhood encourages physical activity and supports practical and daily activities. In turn this supports the health and wellbeing of residents. InAdelaide, only a small minority of people live in neighbourhoods that achieve all or most of the attributes of healthy liveability.”¹

The introduction section of the Policy discussion paper (pg. 5) refers to South Australia as one of the most liveable places in the world and a truly ‘20-minute city’ with a low cost of living and affordable housing. However, the claim needs better substance, and acknowledgement of the social gradient in ‘20-minute city’ living for many Greater Adelaide residents and prospective residents, which in many cases can only be achieved with access to a motor vehicle.

Our vision

Our vision is for the new South Australian Planning System to make a significant contribution to improving health and wellbeing of people by delivering built environments that support active living, healthy lifestyles and connected communities. This vision is supported by over 20 years of compelling evidence that says the **built environment directly influences the health and wellbeing** of our communities.

This is supported by the South Australian Government’s planning principles which state that:

“...neighbourhoods and regions should be planned, designed and developed to support active and healthy lifestyles and to cater for a diverse range of cultural and social activities...”²

It is noted from the outset that the Coalition is not opposed to increased density in our neighbourhoods, and indeed the Coalition is a supporter of the slogan “density done well”. Adelaide already has several good precedent developments that showcase a dense urban form and provide a variety of housing choices and affordability including Lightsview, Bowden and Playford Alive. What makes these places great is their planned nature and focus on people. Walkability and connectivity to open space and other services is considered at the macro and micro scale and the quality of the public realm is exceptionally good.

Additional guidance on built form, contextual character and general good design principles already exist in South Australia and are endorsed by the State Government. These strategic documents need to be given greater attention and weighting in the design and approval processes of all future infill development.

¹ Southgate Institute for Health, Society and Equity (2019). Healthy South Project report

² *Planning, Development and Infrastructure Act 2016. Government of South Australia.*

Our Key Concerns

1. Opportunistic minor infill, (through the removal of detached houses on large blocks being replaced with attached units, townhouses and apartments, or subdivision to create 2 or 3 allotments with higher density housing) is negatively impacting the quality of the street environment and the walkability of neighbourhoods by reducing the tree canopy, increasing impervious areas and creating property frontages dominated by blank walls, fences and garages. Our fear is that additional density will be achieved at the expense of the amenity of the streetscape and neighbourhood character.
2. Smaller allotments and bigger garages could mean that garden spaces on private land will be reduced. With that, existing trees and neighbourhood tree canopy is at risk of being lost or heavily reduced.
3. The Policy discussion paper does not consider a “gentle density” that will add value; creating attractive places that promote active and healthy lifestyles.
4. The public realm’s increasingly important role in providing green space and community facilities is not captured in this policy, and it needs to be given backyards will become smaller as density increases.
5. Active transport options are not addressed in the Policy discussion paper and will continue to be poor in areas where housing is considered affordable and greater density is sought, resulting in high transport costs which in turn impacts on affordable living.
6. Design for walkability needs to be greatly strengthened at every level in the Policy discussion paper and in the Code.
7. Poor housing, neighbourhood design and lack of active and sustainable transport options will intensify existing climate change problems through loss of tree canopy and increasing impervious surfaces exacerbating the urban heat island effect.
8. There is no evidence that The People and Neighbourhoods policy will be truly reflected in the Code and there is no easily navigable relationship between the Policy discussion paper and the Code/rules for delivering its desired urban forms.
9. The lack of guidance across key policy areas impacting on health, liveability and active living outcomes needs consideration and addressing in this Policy discussion paper, and importantly in the Code.

Our Key Recommendations

1. Establish a fund into which Infill developers must contribute, and the Government utilises to ensure investment in local social and physical infrastructure.
2. Commitment is required to shift from 'one site' to 'contextual' approaches to infill development to avoid increasingly poor design outcomes at the allotment level.
3. Greater acknowledgement is required of the need for housing diversity and residential infill that is inclusive of affordability, as well as type/design, and of the significance of location for life-long affordability.
4. Neighbourhood mapping of all areas earmarked for increased density should be done to ascertain existing baseline data on essential infrastructure such as power, sewer and stormwater- and green infrastructure like tree canopy cover and impervious and pervious surfaces to understand the true capacity of the development potential of allotments without negatively impacting existing neighbourhood character.
5. The true value of trees in the context of neighbourhood character and amenity needs to be reinforced and thought about as essential infrastructure alongside power, water and sewer services.
6. The need for, and quality of the public realm needs to be stressed in the Policy discussion paper as a trade-off for smaller (or no) backyards.
7. Active transport needs further consideration including:
 - STRENGTHENING*
 - Commitment across the range of development thresholds and zones to multi-modal transport (prioritising cycling and walking and connected public transport networks).
 - Assessment criteria promoting connected and integrated suburban cycling networks and neighbourhood walkability.
 - Reduced subscription to car parking demands and addressing tree loss.
 - REDUCING*
 - Dedicated car parks in residential development and business zones (previous aspirations for 0.75% parking space per development have not been met).
 - Over-catering for 'typical parking requirements' development that prioritise private car use – i.e. garages, permits buildings up to boundary and maximises cross-overs.
8. Replace the test for retention of significant trees from "retained where they make an important visual contribution to local character and amenity" to "Significant trees should be preserved". In the case of significant trees – include the test of "all other remedial treatments and measures have been determined to be ineffective."
9. Tree affecting activities should be made subject to public notification and consultation.
10. Walking and cycling to key destinations should be considered on equal or higher terms than vehicle movement and car parking in areas earmarked for higher density development.
11. Support integration between the Code and recognised Design Standards and existing Guidelines (e.g. [Streets for People Compendium](#), [Healthy Active by Design](#), [South Australia's Principles of Good Design](#), and the [Good Design for Great Neighbourhoods and Places](#)) and recognised best practice for green infrastructure and water sensitive urban design (e.g. the Cooperative Research Centre for Water Sensitive Cities Draft (CRCWSC) Infill typologies catalogue). The Discussion Paper could provide high level support for these links supported by the detailed guidance when this is needed to support translation in the code's delivery and use.

Further Detailed Feedback

The Coalition offers the following detailed commentary on various themes included in the Policy discussion paper.

Residential Infill

While the Coalition agrees with the Discussion Paper's concern that the Code must address the transformation of existing neighbourhoods by minor infill "via a better range of public spaces and activity into densifying, neighbourhoods" (p.14) this statement does not encompass all relevant issues, nor provide directions for resolving the unintended outcomes of residential infill policy.

The Discussion Paper does not acknowledge the costs of ad hoc densification on the character and the liveability of our urban areas. It also puts increasing pressure on infrastructure, shared services, community facilities and the public realm.

On current evidence, whilst minor residential infill is increasing, it is not delivering anticipated densities, integrated infrastructure and better design. It is reducing private green space, contributing to the loss of mature trees, and stressing amenity, connectivity and infrastructure. This is a significant issue, given the scale of small urban infill (40% of all infill), and the relatively high ratios of 1:1 replacement across Greater Metropolitan Adelaide over the last decade.³ Sporadic, opportunistic small development projects significantly account for this outcome. While it will be difficult for the Code to address undesirable outcomes created by this industry segment, this should be a priority, with strong policy controls articulated in the Code and policy action to incentivise positive infill development outcomes.

Solutions could include greater contributions levied upon this form of development to increase amenity and neighbourhood improvement through a "neighbourhood fund" – similar to the P&D fund – and which must be spent on improving the surrounding area, for example increasing open space, or quality of open space.

Additionally, mapping of existing neighbourhood character can be used to establish a baseline for new infill development impacts (and upgrade requirements). Existing baseline data on social infrastructure, physical infrastructure including power, sewer and stormwater- and importantly green infrastructure like tree canopy cover and impervious and pervious surfaces could be analysed to understand the true capacity of the development potential of allotments. Infill development should only proceed if it is demonstrated that the proposed built outcome will not negatively impact existing neighbourhood character. Indeed, it would be hoped that infill development would demonstrate a net benefit to the neighbourhood.

PARKING

The Policy discussion paper appears to start with the premise that there needs to be allotment or street space to store at least one car, and then build up a picture of where a house, garden and public realm fits in around that.

The treatment of parking garages continues to over-cater for private car ownership (see later comments on better transport planning outcomes below), and current design (blank façade) detracts

³ DPTI (2019) *Minor Infill Greater Adelaide, 2012 – 2018*, SA Government

from the streetscape quality/amenity and passive surveillance functions ('eyes on the street'). The problem of non-compliance with existing Australian standards (eg minimum garage width) should not duplicate the Australian Standard but there is no comprehensive enforcement of the AS2890 off street parking code. We report that pedestrian sight line requirements are being disregarded with implications for safety – fences and garages need to have regard to the relevant standard being provided (p 45).

Rather than focussing on garage widths (which cater for our current desire for wider cars) we could focus on new ways to incorporate greenery into carparking, and better storage in the home so that the garage is not used as a storage room.

For example, if the land size is 9 metres wide then the code could stipulate NO *enclosed* parking space with the house as 'deemed to satisfy' criteria. Or, thinking beyond traditional housing for non-traditional block size, it could be stipulated that a parking space be multi-functional – could be green space, living space, carport space, etc or use underground parking.

<http://www.home-designing.com/narrow-lot-skinny-house-exterior-facade-inspiration-and-photos>

WALKABILITY

Walkability should be to be a central desirable outcome of the planning reform process. However, opportunities to ensure it is achieved have been only minimally expressed in the Discussion Paper, with questions therefore about implications for the code interpretation on delivery and enforcement. Design for walkability needs to be greatly strengthened at every level.

TREE CANOPY

Evidence about the importance of trees and landscaped areas in private and public urban areas for promoting healthy active lives is compelling and is reflected in the **30-Year Plan for Greater Adelaide target of a green liveable city**: urban green cover target of 20% increase across metropolitan Adelaide by 2045. Water sensitive urban design proposals in phase three of the draft Planning and Design Code are therefore a critical part of the strategic, coordinated approach to the greening of residential and non-residential developments, for the benefit of the whole community. The Policy discussion paper acknowledges the lack of clear, consistent, scalable policy that will cater for integrating WSUD across all development types – this needs to be addressed early in Code implementation.

Big, mature trees in particular produce significant value in terms of health and habitat. However, it is not clear whether significant trees under the current definition will have the same level of protection under the Code. There is concern that regulated tree policy appears to have been consolidated within a single Regulated Tree Overlay with no higher order of policy relating to the proposed removal of a regulated tree that is a significant tree. It is unclear as to whether the omission of a separate Significant Tree Overlay is a deliberate policy decision or an inadvertent omission. We suggest replacing the test for retention of significant trees from "retained where they make an important visual contribution to local character and amenity" to "Significant trees should be preserved".

The proposed criteria for a tree damaging activity that is not to be undertaken with other development does not reference the current test that "all other reasonable remedial treatments and measures must first have been determined to be ineffective". The omission of this requirement, at least in respect of significant trees, would result in a severe weakening of the current level of protection. This must be rectified to ensure that the Code affords the same level

of protection to such trees as presently exists under the Development Plan. In addition, tree-affecting activities should be made subject to public notification and consultation.

Affordable Living

More evidentiary detail about why affordable living contributes to liveability should be provided in the Policy discussion paper. This should consider travel commute times, walkability, density of human capital and liveability as wellbeing enablers (and outcomes) for people. Consideration of the thermal performance of new infill development to respond to a changing climate (heat waves) should be factored into the Policy discussion paper and the Code. Some members of our community, including low income households, our ageing population and those with underlying health vulnerabilities may be financially affected by higher home running costs. There are other hidden lifelong costs that should be acknowledged which are associated with infill housing and land developments on perimeter of metropolitan Adelaide. This is particularly relevant to transport costs, which is typically a household's largest expenditure item outside the house itself and the Discussion Paper does not acknowledge that in many outer areas, where the housing may be more affordable, the lack of low cost transport choices (walking, cycling and public transport), adds a significant burden to living affordability. In other words, housing affordability needs to factor in more than cost of housing, and this needs to be planned for.

Minor infill development could be a mechanism for housing choice, housing affordability when provided in existing suburbs with established infrastructure.

GENTLE DENSITY

Densification through minor infill will be more liveable if it is paired with high quality public realm, including a diversity of green and open space for active recreation, interaction and solitude. Quality matters –

"It's not how dense you make it, but how you make it dense."⁴

Public Realm

Recognition of the importance of the public realm for sustainability, liveability, health and wellbeing is very welcome. Given this integral relationship, and the planning and design challenges for public realm and open space acknowledged by the Policy discussion paper, it is of concern that public realm policy and design standards were not released for consultation with the current Planning and Design Code consultation. This is a missing and vital element of planning reform, with lasting impacts if we do not "get it right". For example, the removal of private greenspace because of infill development as prescribed by the Code should trigger the protection of surrounding existing public open space, and the enhancement in quality and offering of this public open space as a result. This needs to be considered and addressed in the Policy discussion paper as a priority.

Active Transport Planning

The Coalition supports policy that improves public transit and puts more of the population within walking distance of a transit stop and acknowledges positive targets for active travel.

⁴ Heart Foundation (2014) Does Density Matter?

South Australia continues to be one of the lowest spending states for cycling infrastructure and cycling participation is trending down.⁵ Conversely, where developers and local government areas (LGAs) invest in infrastructure, participation rates are growing, but this is not coordinated, and connectivity across neighbourhoods and suburbs is poor.

Experience in Greater Adelaide points to expanding outer suburban boundaries in greenfield development occurring in the absence of properly sequenced transport planning, creating outer suburbs beyond the reach of existing public transport networks, leaving their residents (often low-income earners) with few transport options.

In summary, policy translation experience and evidence suggest that the transition away from current transport uses is not happening, with long term costs to human health, life quality and sustainability. While references to walkability and active transport are welcome in the Discussion Paper, the Coalition believes this needs to be greatly strengthened, beginning with acknowledgement of:

- the transport sector's role in improved development outcomes and delivering climate change mitigation (through planning investment in modal shifts and mass transit capability)
- A strategic approach to public transport improvement and expansion, including in greenfield development proposals (pp.47-48) which are currently not linked with transport planning.

Much of the Code's potential and the changes to the planning system more broadly will be unmet if re-zoned areas are not designed, constructed or retrofitted to reduce vehicle traffic and support a pleasant walking and cycling environment at the street level.

Climate Resilience

Increasingly severe weather events, especially heatwaves are linked to climate change. Well designed and protected urban green space is among the most effective mitigation measures for urban heat island effect (UHIE)⁶. Urban greenspace and green infrastructure, particularly tree canopy, helps people be more physically active, by improving air quality, cooling the environment and mitigating urban heat island effect, increasing human thermal comfort in planned and incidental exercise and creating contact with nature. It also plays a critical role in protecting people and property from extreme weather events such as heatwaves and storms.

Notwithstanding that some areas of metropolitan Adelaide provide highly accessible public green spaces, and dense urban tree canopies, the ongoing decline in private green space and tree canopy is of great concern. There is also marked variation in canopy cover across Adelaide suburbs, with tree canopy ranges from 44% in the Adelaide Hills to 12% in Port Adelaide Enfield. The problem of declining green infrastructure is made worse by urban infill development. Associated increases in hard, hot surfaces and stormwater run-off exacerbate climate risk (increased UHIE) and multiple environmental stressors (significant tree loss, water resource loss, waterway pollution). Continued decline in private green space and tree canopy, and poor utilisation of green infrastructure will create irreversible and damaging impacts for climate resilience, biodiversity, health, wellbeing and equity.

⁵ Monro, C. (2019) National Cycling Participation Survey, Austroads, Australia

⁶ Yenneti, K.; Mattheos Santamouris M; Prasad, D; DingBush, L (2017): Cooling Cities Strategies and Technologies to Mitigate Urban Heat Discussion Paper, Cooperative Research Centre for Low Carbon Living NSW

This is a *once in a generation opportunity* to deliver positive outcomes for climate resilience, biodiversity, and human health and wellbeing, by protecting, enhancing and creating optimal urban design outcomes for metropolitan Adelaide into the future.

The relationship and interaction between climate and urban spatial systems is dynamic and complex with profound impacts on human and environmental health. This warrants much greater emphasis within Mandatory State Planning Policy - Climate Change. Additionally, regulatory instruments and incentives should be in scope for the Code and its implementation. Urban green space expansion and tree protection and penalties are key strategies, but an additional 'hot spots' planning overlay (based on thermal data) should also be considered^{7,8}

LOCAL DESIGN REVIEW

The Policy discussion paper reference to a Local Design Review Scheme is welcomed, however, the commitment to explore the "Development of a Local Design Review Scheme" (p.39) as part of the public consultation process has not been met during the consultation period. The Coalition is seeking clarification/commitment to the timeframe for its development and consultation by ODASA, and urges the following in relation to governance and scope:

- Design Panel membership that ensures appropriate professional representation for social wellbeing
- A commitment to early implementation not just to 'think about it' – if not in First Generation implementation then nominate when
- Local design review needs to include
 - Policy safeguards for liveability, walkability and other active transport modes
 - Social and environmental sustainability as compulsory design criteria
 - Focus on small infill to ensure we are not losing existing trees
 - Ensuring existing standards are being met (e.g. for pedestrian access/safety fence building standard pedestrian sight lines)
 - Ensuring that there's a genuine mix of housing stock in major development, and that such developments take advantage of the transport availabilities/potential (e.g. maximise land uses adjacent to transport nodes and avoid previous mistakes (e.g. the approval of Residential Aged Care facility(load generator) next to major transport nodes at Modbury)

It is also queried if the Design Review process will have filters /triggers to ensure that opportunities for appropriate development density around major transport nodes is maximised and, if major suburban centres are in scope, how to ensure diverse housing stock and integrated land use planning are considered.

Policy to Code

⁷ Jiang, Y; Luyao, H; Tiemao, S; Gui,Q (2017): A Review of Urban Planning Research for Climate Change, *Sustainability* V9, 2224; doi:10.3390/su9122224

⁸ City of Melbourne (2017): Climate Change Mitigation Strategy To 2050 Melbourne Together For 1.5°C

What will become of the consultation on the Policy discussion paper is not clear. While it provides an outline of overarching directions for the Planning and Design Code rather than scope strengths, gaps and areas for further development should flow on to Code design and further consultation. Also, there is no direct easily navigable relationship between the Policy discussion paper and the Code/rules for delivering its desired urban forms and the draft Code has been inaccessible in that regard. While it is not clear if or how the Policy discussion paper consultation will be integrated within broader consultation on the Code itself, the Coalition hopes for that integration. Our feedback assumes that issues raised will be considered in terms of their implications for the Code and needed amendments.

The lack of guidance across key policy areas impacting on health, liveability and active living outcomes is a significant concern. The Policy discussion paper refers broadly to the need to “provide clear guidance for managing legitimate community concerns” (p.14). Guidance for quality development outcomes that protect human health and liveability exists for development practitioners, but this is not acknowledged in the discussion paper, and the proposed “like for like” transition between current guidance and the Code’s current form is difficult to see here, or in the draft Code. Equivalent (like for like) guidance has not been developed/is not available for consultation on the Code. As it relates to our areas of concern, the Code does not appear to align policy and specifications to relevant Australian standards.

Concerns about the consultation process/methodology

The Coalition believes that in their current form neither the Code nor the E-planning portal are ready for genuine, fit-for-purpose consultation as envisaged by South Australia’s Community Engagement Charter. Difficulties navigating the code and portal have made it difficult to confidently assess and comment upon the policy directions in an applied context. Similar difficulties experienced by wider stakeholders and users are also on the public record. The Coalition welcomes the Government’s announcement (07/02/2020) of a three-month delay in implementation but remains concerned that the opportunity for proper consultation still might be missed. Given omissions and inaccuracies, the draft Code, supporting policy documents (including this People and Neighbourhoods Policy discussion paper) and the E-portal should be rectified then re-released for consultation and importantly testing. Disappointingly we understand DPTI has indicated that this will not take place.

Further Reading

We would recommend DPTI consider the evidence-based [Model code for neighbourhood design](#) which has recently been released by QLD department of planning.

The Heart Foundation’s [Healthy Active by Design](#) portal contains supporting evidence around the design elements including Buildings, Sense of Place and Destinations.

[The full cost of poor housing](#). This report adds to existing evidence and our wider understanding of the link between poor housing, demands on health care services and associated social costs. This report will stimulate wider discussions and local action to address the important role that good housing plays in underpinning the health and wellbeing of our communities.

[Living with beauty](#). ‘Procurement is important - don’t reward poor design, reward places that put good design at the heart of delivery.