State Planning Commission

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Submission to the State Planning Commission regarding draft Planning and Design Code for Phase Three

Thank you for the opportunity to contribute to the Planning and Design Code by State Planning Commission by making this written submission.

About the Social Planners Network of South Australia

The Social Planners Network of South Australia (SPN) is a group of professionals from a wide range of fields with an interest in high quality social outcomes for communities across the state. In the main SPN members are urban planners, social planners and community services staff working in local government. SPN also includes representatives from State agencies and private consultancies with expertise in these disciplines. There are more than 100 members.

The views expressed in this submission are those of the SPN members who contributed to it, reflecting their specialist expertise, and are not necessarily reflective of the views of the organisations our members are employed by.

In preparation of this submission we also engaged with the Local Government Access and Inclusion Network (LGAIN) regarding the way the Planning and Design Code will enable access, inclusion and quality of life for people living with disability. The LGAIN provides a forum for council staff who have responsibility for disability access and inclusion to share information and knowledge as well as advocating for a best practice approach to access and inclusion across the sector.

SPN appreciates the presentation from Ms Alison Collins as part of the DPTI engagement on the development of the Planning and Design Code.

General comments

Social Planning Network shares concerns that have been raised publicly in the media and in submissions by other parties regarding:

1. The loss of policy content, local variation, intent and rationale, along with spatial direction (eg concept and structure plans) within zones, policy or smaller areas. These have the effect of removing or weakening the policy content that gives expression to local community context, needs and aspirations.

2. The proposed Code approach is partly an 'abbreviation exercise' that succeeds in losing or greatly reducing what little connection the Development Plans had with the strategic

directions and, importantly, any sense of historical planning progression. The valuable <u>normative</u> planning /place-making and good design aspects of what the community has agreed should, or should not occur, appears greatly reduced in the Code.

3. The difficulty of understanding planning policy that has been written for an electronic system but presented in paper format. This has made it difficult for communities and practitioners alike to interpret the proposed policy content. This also risks the Community Engagement Charter not being satisfied re fit for purpose engagement.

Comments on policy content of the Code

We have noticed the following points that have a bearing on the way development process and planning controls contribute to achieving desired social outcomes such as inclusion, safety, health and wellbeing, affordable and convenient living, housing choices, equitable distribution of opportunity, encounter and social diversity in South Australia's cities, towns, suburbs and places.

Aboriginal Connection to Land

SPN notes the scope of the Code is like for like transition. We also note the Commission's acknowledgement of Aboriginal connection to land. Whilst it maybe beyond the scope of the Code, SPN affirms the value of recognising in appropriate ways Aboriginal connection to the land of what is now called South Australia.

We ask the Commission consider dual naming or naming within the Code that uses already recognised Aboriginal names of places. The City of Adelaide has numerous dual named locations, as but one example.

Recognition of our First Nations should not be beyond the remit of a statutory planning document that applies to land, and so adroitly impacts how land valued by Aboriginal peoples for so long is developed.

Recommendation:
SPN recommends that the Commission consider dual naming or naming within the Code that uses already recognised Aboriginal names of places.

Residential Development

Social Planners Network supports the intention to increase housing choice and affordability through enabling greater diversity of housing forms, including ancillary accommodation (akin to dual occupancy) in residential zones, whilst improving the quality of housing and the public realm.

We note the Code proposes explicit policy to seek on site landscaping and greening. This is critical for increasingly highly built sites and streets to increase amenity, visual softening, local biodiversity, and to assist cooling. These assist people to be outside more with the associated health benefits and also the increased opportunity for social interaction. This is increasingly important given the high rates of loneliness and associated mental health issues. The high cost of cooling houses by mechanical means and the impact of heat waves make these policies essential for both affordable living and public health.

We note the Code proposes that new dwellings have windows and doors that face a street or public place, and for windows and other design features that provide informal surveillance over streets and public spaces. We affirm these design outcomes are important for liveable streets and spaces. We note that dwelling frontages dominated visually by garages are poor in terms of the life of streets and the Code's policies seeking better outcomes should be continued with.

We support the intent of these policies and affirm that the intent should be operationalised in practice through ongoing guidelines, championing of the outcomes by political and civic leaders, and consideration of information and guidelines to assist less informed developers – some of whom are 'mum and dad' investors – to make sensible building and site design choices where they have some understanding of the wider benefits.

Crime Prevention

It seems that there is less policy promoting aspects of CPTED in the draft Code than in previous Development Plan policy from the SA Planning Policy Library. Examples of SAPPL content that appears not to have made it into the draft Code (eg in the 'Design in Urban Areas' module) include:

> PDC 3: robust environment resistant to vandalism and graffiti
> PDC 4: lighting in public spaces
> PDC 6 (a-c): landscaping that discourages crime
> PDC 8: avoidance of access between roofs, balconies and windows of adjacent buildings
> PDC 10: avoidance of pedestrian entrapment and movement predictors

Furthermore, there appear to be tensions between policies in Design in Urban Areas regarding safety and the provisions for fencing that allow solid or only partially permeable front fencing up to 1.8 m. This could reduce the level of passive surveillance of residential streets.

Appropriate design of the public realm plays an important role in reducing opportunities for crime. The loss of this policy content has potential for negative impacts on community safety.

Recommendation
SPN recommends that the Crime Prevention Though Environment Design policy content from SAPPL be reinstated in the Code.

Universal Design

There is not enough detail, or adequate quality direction, on Universal Design for access and inclusion in the draft Code to give adequate expression to the High Quality Design Principles described in the PDI Act:
> *Built form and the public realm should be designed to be inclusive and accessible to people with differing needs and capabilities (including through the serious consideration of universal design principles)*

Nor does the draft Code satisfy the 'Principles of Good Planning' on page 22 of State Planning Policies:
> *"Built form and the public realm should be designed to be inclusive and accessible to people with differing needs and capabilities (including universal design practices)".*

The 'Design Quality' content of State Planning Policy 2 does not appear to have been sufficiently considered in drafting the Code:

SPP 2.2 Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design, Crime Prevention Through Environmental Design and Access and Inclusion.

This is a serious shortcoming of the draft Code. With increasing rates of disability and an aging population in SA, as a State we cannot afford to neglect the opportunities provided through statutory planning to increase access and inclusion through universal design in the built environment.

There are some references to universal design, such as in the policy for 'Design in Urban Areas - Residential Development – 4 or more building levels', however, there does not seems to be consistent policy content throughout the Code. If only buildings 4 or more levels have universal design, but not the shared spaces around them or other forms of development, then the Code will not contribute to the achievement of an inclusive and accessible built form and public realm.

Furthermore, it is strange that Movement and Access PO 37.1 (a - d) for 'Design in Urban Areas – Supported Accommodation, Housing for Aged Persons and People with Disabilities' does not apply to other forms of housing. This policy provides for safe and convenient access for residents through ground level access or lifts to all units, kerb ramps at crossing points and a range of other requirements. With this sort of policy content, the Code appears to be providing for <u>good access within a segregated form of residential development</u> for people with disabilities, rather than ensuring an accessible environment everywhere, for the benefit of all, and the full range of housing choice for people living with disability.

The content of Movement and Access PO 37.1 (a - d) for 'Design in Urban Areas – Supported Accommodation, Housing for Aged Persons and People with Disabilities' is also not reflected in the Transport, Access and Parking section of the General Development Policies.

It has been stated that this is a 'like for like' policy conversion rather than a change of policy direction. However, given that Universal Design is an important aspect of 'High Quality Design' in the PDI Act, it is very disappointing that this has not advanced further in the content of the draft Planning & Design Code.

Recommendation:
SPN recommends that further work is undertaken by the State Planning Commission in order to
- provide meaningful and practical guidance to the application of Universal Design principles throughout the Planning and Design Code and other new planning instruments
- ensure a consistent provision of universal design policy within the Code
- consider the development of a specific Design Standard, supported by guidelines and
- provide training for planners in universal design.

Social Infrastructure

There is a growing body of research that shows a link between social infrastructure and a range of positive benefits for individuals and communities such as improved social capital, mental health, levels of trust, perceived safety and neighbourhood cohesion (Baum et al, 2011) and subjective wellbeing (Davern et al 2017). A case study of the Caroline Springs Partnership in Victoria showed that social infrastructure partnership in a greenfields development context resulted in efficiencies and reduced operating costs for service providers including the Victorian Government, timely delivery and improved services, innovation and learning, a more engaged community, social connection and friendly neighbours (State of Queensland, 2018).

It is therefore a concern of SPN that there appears to be a weakening of the links between residential development approval and consideration of the social infrastructure, community services and community facilities required by the future residents and visitors to the development in the draft Code.

Social infrastructure no longer appears in the relevant policy section on Infrastructure in the draft Code. In the SAPPL there was at least one PDC that referenced social infrastructure, hence requiring both the proponent and the assessing officer to consider the provision of relevant and appropriate social infrastructure for the proposed development.

> *SAPPL (v6) Infrastructure:*
> *PDC 2 Development should incorporate any relevant and appropriate social infrastructure, community services and facilities.*

The SAPPL also provided for reservation of land in advance for required social infrastructure in the Community Facilities General Section:

> Community Facilities
> Objectives
> *(2) The proper provision of public and community facilities including the reservation of suitable land in advance of need.*

SPN could not identify in the draft Code the full equivalent to the SAPPL General Section policy for Community Facilities. Some of this policy content appears to have gone missing, despite the declared intent for this to be a 'like for like' policy transition from SAPPL to the P & D Code. Some policy for community facilities appears in zones such as Greenfield Suburban Neighbourhood Zone, but not all policy has been included in the Code. The follow is an example of policy content that has not transitioned form SAPPL to the Code:

> Community Facilities
> PDC 3
> *Design of community facilities should encourage flexible and adaptable use of open space and facilities for a range of uses over time.*

This is an important design quality requirement for contemporary community facilities and it is strange that is has been omitted.

There is a 'Community Facilities Zone' in the Code which could have limited applicability to future community facility development proposals. Many community facilities are located in other zones, especially residential zones. With the trend toward mixed use zoning rather than single use zoning, few Community Zones will be created and some of these may be rezoned to facilitate mixed use in the future. SPN believes that policy guidance for community facilities is required and should be reinstated in the Code.

A clearer link between residential development and the planning of social infrastructure is also required in order to ensure the State Planning Policy delivers the intent of Principles of Good Planning (Activation and livability principles; Integrated delivery principles) and SPP 1: Integrated Planning.

Both the *State Planning Policies* (SPP) and *30-year Plan for Greater Adelaide* envisage residential development that is close to services and facilities in order to create liveable and walkable communities. Without Code policy that addresses social infrastructure provision through statutory planning, there are risks of underserviced communities with potential for negative impacts on health, wellbeing, social connection and access to relevant services for citizens.

Large parts of Adelaide are undergoing densification without clear mechanisms to ensure increased population is linked to provision of social infrastructure. The cumulative impacts of infill development can add significant new demand and outstrip capacity of social infrastructure. This threatens the quality of life and long-term wellbeing of residents, and it also puts at risk the public acceptance of higher density living. Experience in other Australian cities suggests that density increases will be resisted due to insufficient social infrastructure provision to support the future resident population. Early planning for school sites is a particular concern. These are not easy or low cost to retrofit and need to be planned early and in the right locations to ensure land availability as well as encourage active transport to school.

Best practice in the planning and design of contemporary community facilities includes recognition of the role of these in contributing to sense of place, activation of streets and open spaces, and clustering to create successful 'community hubs'. These hubs often build on or include recreation facilities, adding additional elements and creating more flexible, mixed-use community spaces that are financially viable. Adelaide examples of this trend include Glenunga Hub in the City of Burnside and the ARC in City of Campbelltown which include spaces for recreation as well as other community uses. These types of projects enable a more efficient use of space, as Clubroom spaces can be designed for use by other groups outside of the busy times associated with active sport (evening and weekends), and they attract a broad section of the community as well with flexible rooms for a range of programs and activities. The draft Code does not appear to support best practice in this regard. For example, the General Section for Open Space and Recreation includes this policy:

> PO 7.1 Buildings and car parking areas in open space areas are designed, located and of a scale to be unobtrusive.

Furthermore, the Recreation Zone does not include community meeting space, community centre, community services etc, and the Zone policy also encourages buildings to be set back from the street 50 m.

A modern, multi-purpose community and recreation hub is unlikely to be an 'unobtrusive building', and a strong 'street presence' may be desirable to give the building civic qualities, promote surveillance and safety and attract community members to use it.

We note the ongoing intensification of inner and middle Adelaide has increased land values over the last five years during which time many not for profit social service agencies are continuing to provide services and in the case of those associated with disability, been subject to reform associated with the NDIS. The impact of the planning system on land values and the availability of land and facilities for not for profit services in integrated centres or easy access locations is a factor that the planning system needs to better consider. We acknowledge this may be beyond the current Code but is a matter the Commission needs to consider and investigate at some stage.

There also appears to be inconsistency in the language used for community services and facilities between various zones and the general policy content. There should be a review to ensure consistent descriptors and definitions for these.

Recommendation:
SPN recommends that
- the important link between development (especially residential development) and planning for social infrastructure be reinstated in the Code. This could be through retaining social infrastructure policy in the Infrastructure section for General Development Policies.

- the content of the Community Facilities module of SAPPL was of significant value and should be reinstated in the Code.
- there should be a review of the definitions and descriptors for social infrastructure, community facilities and community services throughout the Code to improve consistency.
- The policy for open space and recreation in both Zone and General Section be reviewed to ensure that it supports best practice in community and recreation facility planning and design.
- the Commission investigate and monitor the impact of ongoing intensification in central Adelaide on the ability of not for profit social service providers to provide easily accessible services, often to clients with low means or ability to easily access services.

Conclusion

In conclusion, noting the Network has undertaken a limited technical review of the proposed Code, SPN recognises the significant challenge involved with the development of the Planning and Design Code.

Planning policy, development controls and development outcomes make a significant contribution to achieving shared social goals such as safety, inclusion, wellbeing, access and distribution of resources and opportunity. We ask that the points made in this submission are considered as the draft Code is reviewed and finalised.

Yours Sincerely

Mike Brown

Convenor, Social Planners Network of South Australia

References:
Baum, F., et al 2011. Differing levels of social capital and mental health in suburban communities in Australia: did social planning contribute to the difference? *Urban Policy and Research*, 29 (1), 37-57

Davern, M., et al 2018. Using spatial measures to test a conceptual model of social infrastructure that supports health and wellbeing, *Cities & Health*, 1:2, 194-209

State of Queensland, Department of State Development, Manufacturing, Infrastructure and Planning (2018) *Case Study: Caroline Springs Partnership*