



16 December 2022

Dear Expert Panel Members

UFX final submission: Planning System Implementation Review

Thank you for the opportunity to comment on the Planning System Implementation Review.

Urban Future Exchange (UFX) is a provocative and politically savvy social enterprise, leading progressive discussion in urban studies and related disciplines, in pursuit of an urban future for South Australia that is healthy, confident, equitable and sustainable.

Our membership is broad and balanced and includes individuals and corporate associate members from the public, private, not-for-profit and academic sectors. Our members have qualifications and expertise in urban planning, law, design, industrial design, business, health, sustainability, industry and policy amongst many others. As such, the UFX provides a unique and diverse view on South Australia's urban and regional future.

UFX has a strong interest in strategy and policy. UFX has responded to questions that align with this interest.

Character + heritage policy

Character Areas could have Character Area Statements that clearly identify the relevant characteristics, but more importantly, reflect desired character rather than existing character so that interesting design outcomes can be encouraged.

Tree canopy

Greatest opportunity is on private land

UFX recently attended the Development Sector Round Table to progress the development of an Urban Greening Strategy for Adelaide. There was a general level of agreement at this session that the greatest opportunities for impact are on private land.

UFX is of the view that there is significant scope to increase tree canopy cover on private land to reduce urban heat island effects, increase liveability, and deliver other benefits to people closer to where they spend a high majority of their time.

UFX is of the view that site size dwelling thresholds in the Urban Tree Canopy Overlay could be lowered and the tree size and the number of trees per dwellings should be increased.

Increasing canopy cover in greenfield urban expansion projects

Master planned developments in greenfield areas have the ability to comprehensively plan lot configurations and building envelopes and can therefore factor in greening and tree canopy coverage from the outset.

Requiring additional trees in master planned greenfield developments would not cause any long-term disadvantages and would only deliver long term benefits to residents and communities. It therefore is a 'no-brainer' to include minimum tree requirements for all master planned developments in greenfield areas.

Tree location flexibility

UFX is of the view that adding flexibility to the positioning of new trees in new developments, and the eventual spread of tree canopy, has significant merit and should be considered further.

Other land uses

Although it was not canvassed by the Panel, UFX is of the view that adding additional requirements to other land uses would also generate additional benefits and help reach tree canopy targets. A prime example of this would be increasing tree planting requirements in open air shopping centre car parks.

Tree protections

The most pressing opportunity is to strengthen South Australia's tree protection laws, which have been shown in two recent reviews to be among the weakest in the nation. Our biggest trees provide the greatest benefits and must be retained if we are to have sufficient tree canopy cover for a liveable city.

There is a disconnect between tree circumference thresholds and tree canopy cover targets. Circumference is not necessarily a measure of tree benefit. Other triggers for protection could include crown spread, tree height and tree species, or perhaps calculated economic value.

Using crown spread and tree height potential measures would create better alignment with tree canopy policy objectives and targets. It would also enable better scenario testing between different tree canopy cover targets and different measures.

Should circumference measurements be retained, reducing the minimum circumference for protection is required. Currently only the most elderly trees are protected, which does not support long-term tree canopy protection and growth.

It is important to note that the capability of arborists or other urban forest professions, or even the capacity of the sector, should not be seen as a prohibitor to delivering better liveability outcomes. If the quality of required outcomes is improved, government and

industry will rise to meet those outcomes. Viewed positively, it could also create an opportunity for better services, industry development and job creation.

Tree distance from development

The removal of protected trees that are within 10 metres of an existing dwelling or pool, relative to the approaches undertaken by other jurisdictions around the country, appears to be out of step with common practice, and biased against tree retention.

UFX is of the view that distances should be reduced or potentially eliminated. Greater emphasis should be applied to improving design led solutions that complement existing and future trees.

If urban tree canopy targets are to be achieved, it would be counterintuitive for additional circumstances to allow for tree removal.

Tree offsets

Offset scheme fee payments

UFX is of the view that tree offsetting fees appear to be too low. Increasing the fee payment will incentivise the planting and retention of trees in locations where they are needed, rather than allowing a payment into an offset scheme, where funds may be used for tree planting in a completely different area.

The payment amount should reflect the following disadvantages of not having a mature tree in the required location for decades:

- increased heat
- increased energy costs in summer
- increased stormwater runoff / detention requirements
- reduced biodiversity
- reduced use of private open space
- reduced active lifestyle
- reduced air quality
- reduced amenity
- reduced wellbeing.

Regulated and Significant Trees

UFX is of the view that tree removal fees do not reflect the substantial long term disbenefits to the community. The direct costs of replacing trees, as well as the disbenefits associated with not having a mature tree for decades in that location should be considered in the removal fee.

A way to approach this would be to develop a more comprehensive fee payment schedule, similar to the one used by the City of Melbourne, which reflects the monetizable disbenefits,

as well as replacement and maintenance costs over a 30-evaluation year period. This was also a key takeaway from the recent Development Sector Round Table to progress the development of an Urban Greening Strategy for Adelaide.

Public Realm Tree Planting

UFX is of the view that there should be greater investment in tree canopy coverage in the public realm. This investment could be sourced from greater funding allocations from Council budgets and other funding sources, including State Government.

Should greater weightings be allocated to increasing tree canopy coverage when distributing funds from the Planning and Development Fund, distribution should also be linked to areas of greatest need for additional greening and tree canopy coverage, not necessarily where the funding was derived from. Priority areas could include:

- hotter areas
- areas with a greater prevalence of physical and mental health issues
- areas of socioeconomic disadvantage
- areas with lower biodiversity.

Infill Development

UFX is concerned infill development is sometimes misrepresented or misunderstood. UFX raises the following points for consideration/clarification.

1. Infill is a strategic policy and approach, yet it is usually only used to describe minor infill development activity. Infill also means master planned infill developments such as Bowden, Lightsview, Glenside and Lochiel Park, amongst many others. These infill projects are delivering exemplary infill housing outcomes and urban environments.
2. The term infill is sometimes applied to development that involves the removal of trees and the demolition of one dwelling for the construction of another dwelling with a significantly larger footprint (i.e. 1 for 1 replacement). This is not infill development.
3. Infill development is usually characterized as the primary cause of tree canopy cover loss. Infill development is not the cause of this, insufficient tree policies are.

UFX is supportive of infill development and greater percentages of infill development. Infill development will still occur if better tree protection policies are in place.

UFX is of the view that better policies and approaches should be explored to significantly increase the percentage of infill development that is delivered via master planned infill developments.

UFX would also like to see better information and communication on what infill development is and what is not, and what forms of development (real infill development vs simple dwelling replacement) are actually contributing to loss of tree canopy cover.

Guidelines

In terms of general policies for development, it would be beneficial to see further information in respect to the effects of current policies before significant adjustments are explored.

UFX is supportive of more and better housing design guidance that is accessible to both practitioners and the broader community. Consideration would need to be given to if guidance is to be considered during assessment or if it would sit outside of assessment and be referred to for reference only.

Alternative forms of infill development

UFX is of the view that 'alternative forms of development', including forms that have been described in association with the 'missing middle' have a very important role and place in our society.

Greater housing diversity should be a policy and development outcome of all entities.

Applying the right housing diversity policies in the right locations is paramount. Below are a number of ideas/examples that could be viewed as being the right options in the right locations:

- Enabling ancillary dwellings (granny flats) on larger sites (i.e. >600m) with low site coverage ratios (i.e. <50%). Greater Adelaide has an abundance of sites like these in the middle and outer ring suburbs that could easily accommodate affordable ancillary dwelling units.
- Enabling house over garage/mews dwellings on lots that are rear/side loaded (have vehicle access from a laneway or other form of access).
- Converting existing dwellings into two or more dwellings. This option would suit dwellings/areas where preservation is emphasised and/or demolition is restricted/prohibited. This would also provide affordable rental outcomes in well-established and/or higher land value areas.

This is not an exhaustive list and UFX would be pleased to partner and explore additional options and ideas in the future.

Affordable Housing

UFX notes the Affordable Housing Overlay is not universally applied at this point in time and society is missing out on an increased supply of diverse, Affordable Housing. Extending the spatial application of this policy would encourage greater housing diversity, and ensure more housing supply is designed for, and first offered to, eligible households.

Expanding this policy would not cause any disbenefits or disadvantages to suppliers and would only deliver long term benefits to low to moderate income households, and society more broadly.



Better strategic planning and code amendments

UFX is of the view that the following approaches and activities could deliver better strategic planning, policy development, code amendment and development assessment processes and outcomes.

- Undertaking comprehensive and integrated strategic planning that is based on evidence and considers all potential impacts to society and the environment.
- Placing greater focus on strategic outcomes, and potentially less reliance on ownership factors and administrative boundaries, to inform future strategic directions and scenarios.
- Engaging in open and transparent communication with the community about strategic directions and scenarios.
- Undertaking early engagement with suppliers, partners and communities at a local/neighbourhood level, including better utilisation of design led approaches such as integrated structure planning, concept planning, design charrettes and other forms of localised interactive engagement to explore possible urban futures.
- Using design-led approaches to test and understand impacts in an informal and more visual and interactive way, rather than relying on interpretation of policy and/or deferring a majority of assessments on impacts to assessment process later on in the development lifecycle.
- Using the most appropriate urban design and engagement tools that consider locality, potential development outcomes and level of impact on, and interest from, impacted communities.
- Leveraging outcomes from interactive community engagement processes to inform policy development and code amendments.

UFX has not proposed any formal amendments to processes at this point in time and would welcome further opportunities to engage on options in the future.

Thank you for the opportunity to provide this submission.

If you would like to discuss this submission in further detail or any other matter, please don't hesitate to contact me by email  or by phone on .



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