

STATE PLANNING REFORM
DRAFT PLANNING AND DESIGN CODE
Phase Three (Urban Areas)
Consultation Response from Wellbeing SA
28 February 2020

Wellbeing SA (WBSA) is pleased to provide a response to the phase three of the Draft Planning and Design Code (the Code) as part of the South Australian Planning Reform. The South Australian Department for Health and Wellbeing (DHW) has previously responded to several phases of consultation on the Planning Reform, along with both versions of 30 year plan for greater Adelaide. DHW (and more recently WBSA) have a strong history of collaboration with the South Australian Planning Sector. This collaboration has set out to steer policy directions that are underpinned by stronger coordination; to see the State of South Australia grow and prosper, supported by development trends that promote health, liveability, diversity, accessibility, viability and sustainability.

WELLBEING SA

WBSA was proclaimed as an attached office to the DHW in January 2020. The establishment of WBSA is an outcome of the Better Prevention election commitment of the new South Australian government, instated in 2018.

WBSA will lead innovative system change to embed prevention across the life course and disease continuum, to improve physical, mental and social wellbeing and reduce the preventable burden of disease.

This rebalancing of the health system will mean a significant change from a system that focuses on treating people when they become unwell, to one that is based on promoting physical, mental and social wellbeing, preventing ill health and supporting people to maintain wellbeing and lead healthier lives.

Several of the functions of WBSA have a focus on addressing the social determinants of health and wellbeing; the planning sector and built environment are important components of the framework of the determinants of health and wellbeing.

WBSA is underpinned by equity, evidence, innovation, strong partnerships and community engagement. WBSA continues to evolve; ensuring better promotion of the health and wellbeing of the South Australian community is the central mandate of the agency.

HEALTH AND PLANNING

Planning plays a critical role in determining how individuals and populations interact with their environment. The planning system influences the structure and quality of the built environment which has direct impacts on health and wellbeing. Historically, planning responded to the illnesses caused by overcrowding, poor sanitation and environmental issues through the separation of land uses. In more recent times, the important role that

urban planning and the built environment play in creating healthy and sustainable communities has re-emerged, and become a renewed focal point for urban policy makers and academics alike. Neighbourhoods that create destinations, facilitate active transport, provide safe and thriving public places for recreation and social interaction – including quality green spaces, and are close to employment, services and amenities, are important in shaping population health and wellbeing.

A significant proportion of health issues arise as a result of the circumstances in which people grow, live, work and age. Poor health outcomes and health inequities are often shaped by social, political, environmental and economic conditions, as well as individual behaviours and characteristics; the social determinants of health. Many of these factors lie outside the influence of the health sector, such as the design of our built environment, and the state planning system. Built environment factors influence access and inclusion at many levels in our society. This influences both causes of health inequity and can offer solutions to address health inequities.

Creating healthy communities also delivers benefits for planning. Healthy neighbourhoods are more appealing places to live, work and play; this increases their marketability and profitability. Healthier communities are more productive and make positive economic contributions to both local economies and the economy as a whole. Further, reducing chronic disease has a positive impact on the state budget and is expected to free up funding currently consumed by the health system for other areas of government, including the planning sector.

South Australia's planning and health agencies have a long history of collaboration. Past successful collaborations include:

- [Transit-Oriented Developments...Through a Health Lens](#)
 - Implementation of the recommendations and findings were added to the state planning policy library
 - The publication of a public interface document: Healthy connected communities¹ by the former DPLG, with assistance from SA Health, the LMC and DTEI (July 2011)
- Health in planning positions, located within both DPTI and the former Land Management Corporation.
- [Healthy Active By Design](#)
- [Streets for People](#)
- The establishment of the Active Living Coalition.
- The elevation of health and wellbeing considerations in planning (through the health in planning positions) enabled the inclusion of a Health and Wellbeing chapter in both editions of the [30-Year Plan for Greater Adelaide](#).

The *South Australian Public Health Act* aims to preserve, protect, and promote the health and wellbeing of the South Australian population. But importantly, it recognises that this is not just the role or responsibility of the Health system on its own; but rather its success relies on partnerships and an increased collective effort across government and other sectors.

¹ Government of South Australia, 2011, *Healthy connected communities: Creating healthy urban villages for the future. Transit-oriented developments... through a health lens*, Government of South Australia, Adelaide.

The Act introduced the concept of Public Health Partner Authorities, which recognises that the health and wellbeing of individuals and populations is shaped by broad factors, including the social, economic and physical environments in which people carry out their lives, as well as individual behaviours and characteristics. These factors often lie outside the sphere of the Health system.

The long standing relationship between Health and Planning in South Australia contributed to the Department of Planning, Transport and Infrastructure (DPTI) signing on to be one of the first Public Health Partner Authorities.

A strong focus of this partnership has been to support the consideration of health and wellbeing in the implementation of the Planning Reform package. Ultimately, getting the parameters of the new planning system right will benefit both State and Local Government, and contribute to the creation of thriving, vibrant, sustainable and healthy communities.

As a general comment, notably stronger recognition of the linkages between health and wellbeing and sustainable and quality urban form and design has occurred over the past 20 years and in particular in the South Australian policy context in the last ten years. The connections currently being drawn between health and planning, in policy, program and academia can be attributed to this shift and are allowing us to explore and achieve new policy directions that would not have been envisaged twenty years ago.

HEALTHY PARKS HEALTHY PEOPLE SA

One area that has been a strong focus of Health and Planning partnership is through the implementation of the Healthy Parks Healthy People SA (HPPH), Green Infrastructure in the Urban Setting focus area. HPPH was established through the Public Health Partner Authority Agreement between the Department for Health and Wellbeing and the Department for Environment and Water (WBSA fully endorse and thus wish to reiterate support of the HPPH Leadership Team response as part of this consultation). DPTI are principle sponsors of the [HPPH Green Infrastructure in Urban Settings Action Plan](#) and several DPTI representatives are ongoing members of the HPPH Quality Green Public (QGPS) Space Reference Group. The primary focus of this group has been the inclusion of WSUD principles, private green space and tree planting provisions.

Partners have continued to join as the issue of declining green infrastructure has become more prominent. Currently, partner agencies represented on this group include AECOM, AILA SA, City of Adelaide, City of Charles Sturt, DEW, DHW, DPTI, DPTI-ODASA, Heart Foundation SA, LGA SA, Parks and Leisure Australia, SA Water, ORSR, Swanbury Penglase Landscape Architects, Water Sensitive SA, and WAX Designs.

The current South Australian Planning Reform process is considered a once in a generation opportunity to ensure that urban green space and tree canopy is adequately protected and replenished. It offers a one-off 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.

While there are areas of Metropolitan Adelaide which 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. A 2020 Vision report¹ demonstrated marked variations in

canopy cover across Adelaide suburbs. The study found tree canopy ranges from 44% in the Adelaide Hills to 12% in Port Adelaide Enfield. An increase in hard surface was also reported.

In order to achieve the 30-Year Plan for Greater Adelaide target of increasing urban green cover by 20% in metropolitan Adelaide by 2045, green open space needs to be recognised and valued like other community assets and considered at all stages in planning and development processes. Along with the government's commitment to establishing Green Adelaide, the private tree planting and water sensitive urban design proposals in phase three of the Code, provide a key strategic, coordinated approach to the greening of Metropolitan Adelaide for the benefit of the whole community.

Supporting these proposals is the recently released Creating Greener Places for Healthy and Sustainable Communitiesⁱⁱ document developed in collaboration between the Healthy Parks Healthy People SA Initiative, the Australian Institute of Landscape Architects – SA Chapter, and key partners from the government and non-government sector, as well as industry professionals.

This document is underpinned by a socio-ecological approach to health which encompasses the health of the whole individual, their environment and the whole community. The document provides a guide that recognises and supports the role of quality green open spaces in changing neighbourhoods. Further, it demonstrates that everyone has a role to play in ensuring our neighbourhoods remain sustainable; now and into the future.

Integrating quality green public space into urban development is complex. By working together (government, industry and community), and utilising evidence based best practice principles, there is an opportunity to strengthen the integrated network of high-quality green spaces that join destinations, streets, public transport and residential areas to support comfortable and pleasant neighbourhoods.

PEOPLE AND NEIGHBOURHOODS DISCUSSION PAPER – GENERAL COMMENTS –

The people and neighbourhoods discussion paper touches on the overarching directions for how the Code aims to address issues that impact on human health and wellbeing, including consideration of:

- Amenity and liveability of neighbourhoods
- Increase in impervious/ hard surfaces in infill development
- Reduction in urban tree canopy cover
- Urban heat/climate change
- Biodiversity
- Air quality
- Wastewater and stormwater management

WBSA welcomes these considerations and again the positive shift among the planning sector to draw stronger linkages between health, wellbeing and the design of our built environment. There is however a noted lack of clarity on the following;

- the mechanisms through which the code delivers on these directions/ambitions

- the purpose of the discussion paper
- how the feedback provided on the discussion paper will be addressed/incorporated into code revisions.

The 30 Year Plan for Greater Adelaide identifies clear direction towards opportunities for active transport as a critical component of healthy living in greater metropolitan Adelaide. The code still lacks clarity or articulation as to how this may be achieved in the longer term however.

Healthy neighbourhoods:

- Provide quality space where people can work live and play
- Enable people to have enjoyable social experiences and feel connected to the broader community
- Are safe and secure
- Support local business to thrive and encourage an active consumer base
- Promote health behaviours such as being physically active, or active modes of transport
- Are clear of pollutants and provide communities with access to healthy food and clean water.

With a predominant focus on health promotion, prevention of ill health, and consideration of the social determinants of health, the following general issues and recommendations have been identified by WBSA as critical for further consideration through the Code and Discussion Paper review process:

- The Code should deliver provisions to ensure that higher density infill and greyfield development occurs in a manner that improves and enhances both population health and wellbeing and the health of our natural environment. There needs to be stronger consideration of the social licence for infill development, and the significant implications for future generations if higher density living is delivered poorly.
- A social planning lens analysis should be applied to the code. More attention should be paid to drawing the linkages between people and the social, health and wellbeing impacts of neighbourhood design. Further, the Code and related policies should recognise the co-benefits of human and environmental health considerations, for example “active living for a changing climate”.
- WBSA recommends stronger integration between the Code and the State Planning Policies and other evidence based planning and design guidelines. For example, there is opportunity for the Code to clearly and directly reference existing Design Standards and guidelines, such as the [Streets for People Compendium](#), [South Australia’s Principles of Good Design](#), and the [Good Design for Great Neighbourhoods and Places](#).
- Public Realm Design Standards are recognised to be a further gap in the Code, where adequate guidance is not offered. We consider this to be a missed opportunity for protecting and enhancing the delivery of urban green space and tree canopy through the public realm, and the resultant opportunities a well-designed public realm offers in terms of promoting health and wellbeing.
- Neither the Code nor the E-planning portals are ready for genuine consultation as envisaged by South Australia’s Community Engagement Charter. Difficulties

navigating the code and portal have created challenges for many stakeholders 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. It has been challenging to comprehend timing for responses as updates to the Code have been occurring while it has been out for consultation. Wellbeing SA do commend the decision to postpone the launch of Phase Two and Phase Three of the Code (Announced 7 February 2020); to allow for stakeholders to build greater confidence and feel better prepared to use the new ePlanning portal, before it goes live. However we remain concerned that further consultation opportunities will be required. Given omissions and inaccuracies, the draft Code, supporting policy documents (including People and Neighbourhoods) and the E-portal should be rectified then re-released for consultation. Wellbeing SA suggests that the second generation of the Code is immediately progressed, and that ample feedback opportunities to shape this second generation are provided.

- Further, we recommend that the process for development approval is consulted on and tested separately to the policies/rules/code/regulations.
- Wellbeing SA supports the strong acknowledgment of cultural connection to land for Aboriginal Peoples in SPP 7 – SA’s Cultural Heritage. Connection to Country and Culture are significant determinants of Aboriginal Health and Wellbeing, however WBSA recommend that further consultation and strategies for recognising Indigenous heritage are explored through the Code – particularly in relation to adequate protection of locations of significant Aboriginal Cultural Heritage.
- WBSA supports the proposed local design review panel (as outlined on page 40 of the Discussion Paper) in principle and would like to see clarification of and a solid commitment to this proposal i.e. a timeline for establishment, the process for establishment, consulting on panel terms of reference etc.
- WBSA also recommends that Panel membership incorporates social, health and wellbeing expertise – representation from a cross-section of sectors, beyond planning and development is strongly recommended.
- WBSA recommends that the terms of reference for this panel incorporate stringent policy safeguarding to ensure that key liveability and sound development aspirations are achieved, for example:
 - Small infill development that protects green space should be favoured
 - Panel to cross-check against existing standards to ensure they are being met (e.g. for pedestrian access/safety fence building standard pedestrian sight lines)
 - Panel to consider holistic vision and ensure 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 - how will the Design Review process have filters /mechanisms to ensure that we are maximising opportunities for appropriate development density around major transport nodes?

The following subsections are detailed and a series of recommendations, followed by supporting evidence is provided for each of these.

Green Infrastructure/Urban Greening

Recommendations

WBSA strongly support the inclusion of WSUD principles, private green space, landscaping and tree planting provisions in phase three of the Code, which support the growing evidence of the multitude of health and environmental benefits provided through urban green space.

WBSA support the acknowledgement (pg. 14) of the importance of design in delivering good development outcomes, and clear guidance on issues such as retaining or expanding tree canopy in areas of increasing density.

Based on the themes outlined in the People and neighbourhoods paper (and subsequent performance outcomes listed in the code itself) WBSA make the following recommendations for consideration:

- That a comprehensive monitoring and evaluation process underpins the implementation of the first generation of the code to test effectiveness across a range of contexts.
- That a renewed strategy for monitoring compliance with code is developed – a lack of compliance is a recognised shortfall in the current planning system. For example, whilst landscaping plans may be included in a development application, these may not necessarily be fulfilled.
- That the Code better articulates Water Sensitive Urban Design deemed to satisfy criteria for non- residential development, and development of varied forms and scales.
- That the Code incorporates mechanisms to incentivise both the retention of existing trees and the planting of new and replacement trees occurs as a requirement. Tree species require decades of growth before maturing to a stage where they are able to provide a full and shady canopy. Therefore replacing an existing mature tree with one or even several young trees, does not account for this interim loss in canopy cover.
- Clearer articulation and consideration of the broader human benefits (social/mental/physical/spiritual wellbeing) and thus the breadth of negative impacts caused through reduced green space and tree canopy, and increasing urban temperatures. The discussion paper really only references Tree canopy and water sensitive urban design in relation to climate change.
- Clearer identification of the ‘triggers’ within the Code to ensure that the removal/reduction of private, open space [as a result of infill development] is adequately supplemented with useable, public, open, green space. Further, this should incorporate strategies for locating or enhancing public green space in areas close to where the loss of private green space is predominantly occurring.
- Development of recommendations to oversee the retention of sufficient levels of open, green space within urban areas: developing of an overlay for urban heat, tree canopy and green infrastructure [to ensure identification of priority areas], should be progressed as a matter of urgency.
- Exploration of potential options for subsidising or providing free advice, for residents or developers, to ensure that that appropriate and quality green infrastructure is provided in the locations that need it the most.

Waters Sensitive SA

As partners on the aforementioned Quality Green Public Space Reference Group and key contributors to the Creating Greener Places for Healthy and Sustainable Communities, Wellbeing SA recognise Water Sensitive SA as key community champions and strong partners in a shared goal to deliver improved outcomes for Green Infrastructure and Water Sensitive Urban Design through the planning reform process. Wellbeing SA have reviewed the Water sensitive SA response to this consultation process, which focuses in great detail on the performance outcomes and deemed-to-satisfy solutions for both residential and non-residential development.

WBSA wish to reinforce support of the recommended amendments to both (or either) performance outcomes and deemed- to- satisfy outcomes for – and supporting rationale - outlined in Water Sensitive SA's submission, including in relation to:

- Landscaping
- Environmental performance
- Car parking appearance and vehicle access
- Private open space
- Landscaping
- Water Sensitive Urban Design relating to residential development, non-residential development and major land divisions.

Supporting Evidence

Metropolitan development should positively support both the health and wellbeing of residents, and the health and sustainability of our natural environment. As the population of the Adelaide Metropolitan area increases and ages, the need to co-locate housing and services is becoming increasingly important for providing a high quality of life for residents. In recognition of this, the densification of inner and middle ring suburbs, close to schools, shops, entertainment and employment has become a key target for the State Governmentⁱⁱⁱ. It is well recognised that the densification of our urban areas provides protection against urban sprawl impacts on agricultural and conservation land, while also enabling the efficient implementation and use of key infrastructure. There is however evidence^{iv} that densification, when implemented poorly, is having major negative impacts on public health and wellbeing. The loss of the urban tree canopy and the increase of impervious, dark coloured surfaces in the suburbs are known to increase the probability of increased temperatures in urban areas.

Trees are known to be the most effective mitigation strategy for the urban heat island effect, even when compared with light coloured paving and roofs and the installation of green roofs and walls.^v Residential private garden spaces play a predominant role in supporting Councils and State Governments to mitigate the effects of the urban heat island, and to achieve canopy cover targets, as the majority of urban vegetation is located in these private spaces.^{vi} Further, there is growing recognition and a growing evidence base, demonstrating the significant budget burden that heat waves and increased urban temperatures have on the health system.^{vii} Exposure to extreme heat leads to a range of heat-related illnesses can exacerbate pre-existing health conditions, and leads to a spike in demand for emergency health services.

Within Adelaide, increased urban density has resulted in 17% of the local council areas of Unley, Burnside, Adelaide, Prospect, Walkerville, Campbelltown, Tea Tree Gully, Salisbury

and Norwood, St Peters and Payneham identified as being urban heat islands^{viii}. Urban heat islands are areas that are 125m x 125m in size and at least 2°C above average. They can lead to a disproportionate build-up of urban heat, often in areas that are not readily able to release that heat effectively.

Urban trees are known to have strong positive impacts on the social, physical and mental health and wellbeing of individuals and communities. The inclusion of trees on private properties is likely to have similar health and wellbeing benefits to residents and their neighbours. If trees are planted in garden spaces which face streets, laneways and other public access spaces, these benefits have the potential to extend to the broader community. Other health and wellbeing benefits of trees include:

- Improved air quality, including; lowered prevalence of asthma^{ix} and greater filtration of pollutants.^{xi xii xiii}
- Decreased cardio metabolic conditions.^{vii, ix}
- Improved mental health and wellbeing.^{vii}
- Reductions in UV Radiation^{vi, vii}
- Improved Nutrition.^{vii}
- Reducing the impacts of cold climate extremes.^{vi, xiv}
- Reducing the impacts of hot climate extremes.^{vi, vii, xi, iv, v, vii, x, xv, xvi}

Mitigating the impact of heat waves through urban cooling, also prevents heat related deaths, which are known to be most prevalent among older people, and those with mental and behavioural disorders, in fact evidence suggests that:

- in heat events, shading provided by large trees can reduce energy use and associated bills by 10%.^{vi}
- Strategic placement of trees around buildings has been found to reduce air conditioning requirements by up to 30% and heating requirements by up to 20-50%.^{x, xi, xvii}

Vegetation has been found to be more effective at increasing the albedo effect (measure of how much of the sun's energy is reflected back out to space, as opposed to being trapped in the earth's atmosphere – high albedo has a cooling effect on the earth) than other mitigation strategies, including pale roofs and light coloured paths and roads.^{v, vi}

Housing Affordability/Diversity

Recommendations

WBSA support the recognition of housing affordability and living costs, however wish to reiterate that minor infill (greyfield) development is not necessarily the ideal mechanism for a coordinated and strategic approach to housing affordability. WBSA strongly supports the need for housing diversity which must be inclusive of affordability as well as type/design. Whilst it is noted and recognised that Adelaide continues to rank as one of the most affordable Australian cities to live in, the cost of housing and cost of living continues to rise. Caution should be taken regarding a focus on our reputation as a “twenty minute city” as a large part of Adelaide is not subject to the 20 minute city experience. Ultimately this is an issue of equity – those who live further from the inner city have less capacity to access the benefits the 20 minute city has to offer.

In order to deliver better housing affordability outcomes in South Australia, WBSA recommend further consideration - through the finalisation of the Code - of the following:

- Opportunities for improved coordination of infill development to avoid poor outcomes in terms of the loss of mature trees and greenspace, and poor design considerations from the perspective of social and environmental sustainability.
- Alternative car parking solutions to address the growing issue of on and off street parking and garages dominating housing street frontages; which in turn have negative implications for walkability and street connectivity.
- Application of precinct master planning approaches and design considerations, not only to green and brownfield development, but to grey and infill development areas as well. This could be achieved through further incentivising certain forms of infill development. Currently, 40% of all infill is small and ratios of 1:1, 2, 3 or 4 replacement are predominant, which suggests that small infill policy is not succeeding in delivering higher density suburbs that achieve the neighbourhood quality and amenity envisaged.
- Further clarity of mechanisms to address the 'missing middle' (pg. 17). There is a tenuous relationship between 'missing middle' and walkability – we can't assume this form of development will succeed, especially if tree canopy is depleting and transport connectivity is not adequately considered.
- Consideration of equity is evident in the Discussion Paper, however there are many reference to elements of the metropolitan Adelaide lifestyle that are not equitably accessed by every South Australian. For example, not everyone can afford the redeveloped/remodelled existing co- housing options that are showcased in the discussion paper; whilst WBSA support and commend these options, they predominantly apply to older bungalow homes in prestigious neighbourhoods. Further, in the introduction section of the Discussion paper (pg. 5) there is reference to South Australia being considered one of the most liveable places in the world and a truly '20-minute city' with a low cost of living and affordable housing. More detail around why this contributes to liveability would be ideal, i.e. connecting the dots between low commute times and low cost of housing and wellbeing outcomes for the population.
- WBSA support and commend the recognition of changing household structure and the growing ageing population and single person households as key drivers of changing housing choices. More evidence should be provided of how the Code will provide triggers see that more South Australians are able to affordably enjoy the 'liveability' of Adelaide.
- Strengthen the evidence summary (discussion paper - pg. 7) in relation to housing choice and the negative health and wellbeing impacts that can arise from living in smaller dwellings with smaller backyards i.e. loss or private green and outdoor space, overcrowding.
- Strengthen the evidence summary (discussion paper) on the importance of housing affordability and climate change from an individual and community, health and wellbeing perspective (pg. 7).
- Strengthen the evidence in the considerations of the discussion paper relating to the importance of housing affordability for population wellbeing outcomes, expanding on

the point made (pg. 15, paragraph 2) about housing affordability being a primary driver for economic and social sustainability.

- There is reference (pg.13) to anecdotal evidence of what ‘younger people prefer’ from a housing location and choice perspective. WBSA recognise that diverse housing choices in inner city urban areas are important but recommend that research is commissioned to provide more robust evidence in support of this policy assumption/position.

Supporting Evidence

Housing is a crucial component of the relationship between human health and wellbeing, and the built environment. Housing is central to our lives and to the fulfilment of basic human physiological needs, and thus to protecting and promoting human health and wellbeing. Housing provides not only the benefits of shelter but also, through location, access to a further bundle of goods and services (and determinants of health), such as employment, education, and social connections.^{xviii},^{xix} In order to optimise positive health outcomes, affordable housing should be well built; located close to transport, shops hospital and community services; and suited to the needs of its residents.

Affordable, good quality (dwelling and neighbourhood) and stable, secure housing is a key precondition for promoting health and health equity, preventing illness and, building healthy and inclusive communities.

A lack of secure, good quality and affordable housing can be associated with a range of poor mental and physical health outcomes - respiratory diseases, cardiovascular diseases, injuries, mental health problems and infectious diseases. Ultimately, our housing system influences downstream health system costs.

Active Transport/Streetscapes/Walkability

Recommendations

With past development patterns across Adelaide prioritising greenfield and car-centric low density neighbourhoods on the urban fringe, there is a need to rethink and deliver transport infrastructure that supports higher density infill suburbs. Whilst we note and welcome reference to the importance of walkability and active transport in the People and Neighbourhoods discussion paper, WBSA proposed further consideration and articulation of how the code can deliver on the following:

- Adequate transport requirements to support the proposed increase in the ‘missing middle’ type development.
- Design for more walkable neighbourhoods at every level, including strategies to enhance residential development mix and walkability/connectivity around middle suburb activity centres.
- Assessment criteria to promote better connectivity of urban cycling networks.
- A strategic approach to public transport improvement and expansion, including a commitment across the range of development thresholds and zones to multi-modal transport (prioritising cycling and walking, and connected public transport networks).

- Improving the balance between parking and other modalities as we transition to a more sustainable transport and living environment. For example, a previous aspiration to achieve a 0.75% parking space per development limit has not been met.
- A reduction in car use and dedicated car parks in developments and business zones.
- Better acknowledgement (in the sustainability policy section of the people and neighbourhoods notably) of the contribution of the transport sector to climate change and its mitigation (ref p 57-58 transport walkability sustainability).
- Opportunities for improved approaches to infill development to avoid poor outcomes in the combination of:
 - loss of mature trees and greenspace,
 - design considerations for social and environmental sustainability
 - dominance of garages/parking on street frontages
 - opportunities for active transport
- A more coordinated approach to infill development i.e. application of precinct and master planning approaches to all infill development areas and discouraging the single allotment, homogenous and lowest cost building choices. Master planning design considerations for grey and infill development areas could be achieved through incentivising desired forms of infill development, so that achieved.

Supporting Evidence

Well-designed streetscapes provide health and wellbeing benefits through providing safe, attractive, and accessible places for active transport and social interaction. They also provide significant economic benefits by attracting use by the local community as well as visitors, and environmental benefits, including contributing to reducing greenhouse gas emissions through encouraging cleaner transport options and improving access to local destinations (Streets for People). Currently the scale of small urban infill is high (40% of all infill), as are the rates of high ratios of 1:1 replacement across Greater Metropolitan Adelaide.^{xx} This demonstrates that the current approaches to infill are not succeeding.

In order to support a transition towards a more sustainable and less car-dependent transport culture in Adelaide moving in to the future, a general shift in the way that car-parking is prioritised is required. Currently a tension exists between car parking provisions, walkable neighbourhoods, and tree canopy/green space. The benefits of reducing off-street parking include minimising the tension between driveway crossovers in higher density new development competing with street trees and landscaping, and therefore impacting amenity, walkability, and opportunities of green cover and WSUD features in the public realm. Further, smaller infill development, where space is at a minimum, are meaning households have less storage space which consequently increases the use of garages as domestic storage spaces and thus increases demand and impact of on-street parking.

Social and Community Connectedness

Recommendations

WBSA strongly recommends further consideration of opportunities for casual social and community interaction in the design of streets and neighbourhoods in a changing and densifying urban Adelaide. The design of streets and neighbourhoods has important

implications for how residents and communities interact, and subsequent outcomes in terms of both safety and social wellbeing, among many other health and wellbeing implications.

For example, a trend we are seeing is enclosing of front yards to increase residential private open spaces, to compensate for smaller or non-existent rear private yards in higher density infill development. Whilst this may have positive outcomes in terms of the overall benefits offered through urban densification, it threatens the social and safety benefits provided through the connectivity of public and private spaces - the home to street interface - such as casual surveillance and casual/incidental interaction between neighbours.

As covered in the previous section, the design of streetscapes, including the provision of street trees and the prevalence of cars or public transport, further contributes to the conviviality of streetscapes, and thus opportunities for social and community connectedness.

Supporting Evidence

Humans are naturally social. Yet, the modern way of life and the changing structure of our cities are greatly reducing the quantity and quality of social relationships. More and more people of all ages in developed countries are living alone, and loneliness is also becoming increasingly common.

Social connectedness comes when people play a part in creating and sharing their own experiences with others.^{xxi} Good quality social connections enhance our sense of wellbeing and quality of life, and promote healthy ageing. A sense of community and belonging where people live, work, play and travel are important determinants of physical and mental health.

A study drawing on research involving more than 30,000 people found a direct relationship between social isolation and levels of morbidity (the rate of sickness) and mortality (numbers of deaths). The study equated being socially isolated as having the same health impact as smoking 15 cigarettes a day or drinking six standard drinks of alcohol.^{xxii} This demonstrates the relevance of social networks to longevity – the influence of social relationships on the risk of death may be comparable with well-established risk factors for mortality such as smoking and alcohol consumption and potentially exceed the influence of other risk factors such as physical inactivity and obesity.^{xxiii, xxiv}

For social connectedness to occur the built environment and surrounding space play a crucial part, supporting the formation of formal and informal networks. Importantly, social connectedness is enhanced when community members have more opportunities to engage with each other, especially when they share a range of spontaneous and continuous encounters or incidental interactions. Incidental interaction enhances possibilities for human connection and caring. In turn, this increases perceptions of safety and reduces feelings of loneliness and isolation, all of which have benefits for mental health (Kent et al 2011). Opportunities to meet have to be accommodated by walkable neighbourhoods, effective transport systems, and streets and public spaces that are safe, accessible to all, responsive to local cultural context, as well as aesthetically pleasing. Green and open spaces also facilitate contact with community, as well as contact with nature. In addition, a large body of research suggests that people will not interact within, or feel part of, a community that they perceive to be unsafe (Wood et al., 2010).

Participation in the shaping of the built environment can also support psychological health by fostering feelings of empowerment and belonging. The way the built environment is governed can cultivate this participation (Kent et al, 2011).

Smart urban planning and a planning system which considers the social consequences of policies that may promote or hinder the formation and development of social networks is an important aspect for building thriving, connected and safe communities.

Urban Food Production and Healthy Food Environments

Recommendations

WBSA strongly recommend further exploration of mechanisms in the Planning and Design Code to promote healthier eating opportunities in South Australian communities.

In response to this public health issue, the Code could better explore:

- Adequate land use constraints to enforce a minimum distance between a proposed fast food outlet and schools.
- Land use planning to incentivise location of supermarkets and other fresh food outlets within accessible distances of residences in growth areas.
- Zoning and regulation to limit marketing and advertising infrastructure such as billboards and signs. The Code provides an opportunity to limit the use and location of billboards to advertise unhealthy food options, particularly in the vicinity of schools.

WBSA commends the efforts to recognise the importance of prime agricultural land for urban food production.

Supporting Evidence

A growing evidence base suggests that the location of fast food outlets and exposure, particularly for children, to fast food within in close proximity to schools or other community areas has a negative impact on a growing obesity problem.^{xxv} Research is now showing higher rates of obesity among people who have access to unhealthy food environments, such as fast food outlets. Obesity is a key public health issues as the number of obese and overweight people continue to rise at unprecedented rates. In South Australia (2017-18) 68.3% of the (over 18) population reported a body mass index that classified them as overweight or obese.

Healthy Food Environments incorporate^{xxvi}:

- Built components (i.e. food outlets and transport infrastructure)
- Natural components (i.e. community gardens and food growers)
- Economic components (i.e. supporting local producers and food swaps)
- Socio cultural components (i.e. cooking and education programs)

Healthy food environments require a broader picture focus, from land use planning and the need to protect existing land used for food production, through to community based initiatives that support the growing and sharing of food.

This in turn enables for increased accessibility, availability and affordability of local healthy food choices for all, especially vulnerable groups, increased community connection, with food as a social and cultural connector, and a multitude of environmental and economic advantages for local business and sustainability purposes.

State and local government departments, planners, urban designers, health professionals and community groups and organisations all have an interest in the linkages between land use planning and food production. Stakeholders need to consider food system issues during planning decision processes in order to promote a strong regional food system that supports economy and local business, as well as promotes population health and wellbeing and environmental sustainability.^{xxvii} Considering food in planning can strengthen regional food economies and reduce the risks to food supplies from climate change, peak oil and limited land and water availability

Planning decisions affect all parts of the food system from production through processing, to consumption and waste disposal:

- Food production: land-use planning affects the availability of fertile land for community food production and agriculture in urban, peri-urban and rural areas.
- Processing and transportation: planning decisions affect the availability of critical infrastructure, such as food processing facilities, transportation and distribution hubs, as well as water, energy and other resources needed to process and transport food.
- Consumer access and utilisation: planning decisions affect the distribution of shops and food outlets in local areas, and the availability of transport to get to shops and other food outlets.
- Waste, re-use and post-use management: planning decisions affect waste treatment and the re-use of raw materials, as well as opportunities to recycle food and consideration of how to utilise food waste

The 30-Year Plan for Greater Adelaide includes a map of agricultural land abutting the metropolitan area, with a classification of its agricultural use. The map clearly identifies the potential impact of urban growth on food and wine production, and aims to protect land with primary production significance. The policy theme of 'health and wellbeing' clearly links planning with food systems.

The *Planning, Development and Infrastructure Act 2016* (PDI Act) introduced legislated Environment and Food Production Areas (EFPAs) to protect our food bowl, tourism assets, valuable rural areas, landscape values and environmental resources, and to guide Adelaide's future urban form. These are strongly supported and appear to be echoed through zoning in the Planning and Development code.

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