



3<sup>rd</sup> December 2018

## *Response to the Natural Resources and Environment Policy Discussion Paper*

### ***Australian Institute of Landscape Architects - SA Chapter (AILA SA)***

AILA SA thanks Department of Planning, Transport and Infrastructure (DPTI) for the ongoing opportunity to provide feedback and expertise to inform the Planning Reform in South Australia.

AILA SA is the local chapter representing the Australian Institute of Landscape Architects, the growing national advocacy body representing just under 4,000 active and engaged landscape architects across the country. We are committed to creating a better Australia that acknowledges the benefits that natural systems can provide for our physical and mental health and the role that good design plays in creating vibrant and liveable cities and neighbourhoods.

Landscape architects have the skills and expertise to resolve a diverse range of complex issues with innovative, integrated solutions demonstrated in many award-winning projects across Australia.

We can contribute leadership, creativity and innovation as landscape architects collaborate with many varied disciplines and stakeholders striving to achieve better, healthier environmental, social and economic outcomes for the built environment. Projects include varying scales from citywide strategies to the redesign of local parks. Landscape architects within government and in private practice work alongside other government and allied professionals in building stronger communities through making places and spaces more sustainable, productive and enjoyable for all.

AILA SA has most recently provided feedback on the State Planning Policies and welcomes the ongoing involvement with the Planning Reform consultation process. [Click here](#) to review AILA SA's ongoing advocacy to support the Planning Reform in SA.

We provide the following feedback in relation to the Natural Resources and Environment Policy Discussion Paper and commend the Department for their ongoing work.

### **General Feedback**

#### **Purpose - Page 6**

AILA SA notes that "The State Planning Commission is mindful of the recent change of Government, and that current strategic directions may evolve as the new Government continues to progress its agenda". We believe that the issues included in this discussion paper are important to all people and to the future of our State, regardless of the political environment and we reiterate our views on the Liveability of Cities below.

We strongly support the vision for the policy discussion paper and agree, we need to "support urban form that is more efficient, liveable and resilient to a changing climate and helps to preserve the ecosystems that help safeguard the prosperity, vitality and sustainability of our state".

AILA fundamentally believes that the thoughtful design of both soft and hard infrastructure is equally critical to the success of planning and reshaping our cities and regional centres to address the challenges of social and economic shifts.

Informed development of Australia’s natural infrastructure assets is key to tackling the major issues facing Australia’s cities, towns and regions including; an ageing population, rising obesity and diabetes rates, reduced fitness particularly in young children, social exclusion and the increasing importance of positive mental health, major transportation challenges, climate change and heat-related deaths.

### **Why Are Natural Resources and The Environment Important? – Page 9**

We believe that Natural Resources and the Environment play a vital role in the resilience, substantiality, health and wellbeing of our people and our State. AILA SA supports the key themes of the discussion paper and believe they play a significant role within the planning system and require careful consideration with an holistic approach. All of the issues together contribute to the liveability, vitality and economic resilience of our communities.

- Sustainable and Liveable Urban Environments
- Water Security and Quality
- Biodiversity
- Coastal Environments
- Natural Hazards
- Environment Protection and Environment Health

### **Climate change mitigation and adaptation - Page 10**

AILA SA strongly supports that “the state’s future prosperity and liveability will depend on how effectively we address and respond to the impacts of climate change”.

More people are choosing to live in cities and built up areas for employment, education and lifestyle opportunities. Increasingly, Landscape Architects are taking leading roles locally and nationally in the planning and redevelopment of urban and regional areas as well as major infrastructure projects. The liveability of cities, towns and suburbs will determine their long term economic success and resilience. Landscape Architects are champions for liveable cities, particularly through the professional respect of place and increasing the integration of green infrastructure and advancing climate change adaption and mitigation.

AILA recommends that Climate Change mitigation / adaptation is given greater recognition as a critical element to the sustainability of cities, towns and suburbs and managing our landscapes.

Green Infrastructure policies are critical in Climate Change mitigation and adaptation. Green Infrastructure is defined by AILA as “the network of natural landscape assets, which underpin and provide for the economic, socio-cultural and environmental functionality of our cities and towns.” Green Infrastructure, when planned well and integrated into the public realm can contribute to improving the comfort, quality and health of the city and its residents.

Evidence shows that urban heat is increasing during the days and nights as we lose local tree canopy cover and replace open green space with urban infill and increased paved surfaces. Rising urban heat directly impacts on the annual cost of living for local communities and at times of extreme heat can

have fatal effects on the youngest, eldest and sickest in our society. We refer you to the AILA Position Statement – [Liveable Cities - Cooling Cities – Urban Heat Island Effect](#).

Green Infrastructure initiatives can include living roofs and walls, street trees and tree planting, treed open-spaces and rain gardens that can protect the community against the potentially life-threatening effects of flooding, excessive heat (urban heat island impact) and other climatic variables. Green Infrastructure encourages biodiversity and provides the critical connections within and between ecosystems. It is also considered an efficient and effective means of managing stormwater, when compared with traditional grey infrastructure solutions.

We call for Department of Planning, Transport and Infrastructure in collaboration with the Department for Environment and Water to prepare a Green Infrastructure Strategy that sets the direction for broader regional landscape management and restoration in SA. [Click Here](#) to read our recent submission on Managing Our Landscapes - Discussion Paper.

Nationally, AILA is calling for the development of a Green Infrastructure Strategy to be led by Infrastructure Australia. The Strategy seeks to advance the significant contribution that ecological and biological systems can contribute to the development of city, regional and rural infrastructure.

#### **Liveability, wellbeing and inclusion - Page 12**

AILA SA believes that this section could be strengthened with reference to physical health with more details in the Key Trends section outlining the critical relationship between green infrastructure and physical health.

AILA SA suggests the section on **Liveability, Wellbeing and Inclusion** has strong connections to the visions of the Draft State Public Health Plan 2019 - 2024 and alignment between Government Agencies can contribute significantly to preventive health measures that support the health and liveability of our neighbourhoods. Green infrastructure is critical to the liveability, wellbeing and inclusion and AILA SA advocates that government policy must quantify and qualify the development of high-quality open space to improve the health of our communities. Opportunities for Green Infrastructure need to be prioritised and integrated within a holistic Government strategy.

AILA SA has been pleased to co-sponsor (along with DPTI and ODASA) the Healthy Parks Healthy People (HPPH) - Public Open Space Action Plan as part of the HPPH Framework. A collaboration between Department of Health and Ageing and Department of Environment and Water. [Click Here](#) for details.

AILA SA looks forward to continuing to work with the State Government to develop appropriate policy change and new program directions that relate to the natural resources management and environment reform.

We suggest that infill development serving an increased population density is often associated with reduced open space meaning that public open space in urban areas plays a critical role in *Liveability, Wellbeing and Inclusion* of our communities. More prescriptive controls need to be placed on development to ensure good design outcomes are achieved. A shift in focus to achieving liveability in conjunction with desired minimum densities needs to occur. This includes stronger consideration of opportunities for green infrastructure in both private and public open space.

## **Economic competitiveness - Page 15**

AILA SA strongly agrees that “maintaining and enhancing our healthy, biologically diverse environment will help make South Australia a better and more productive place to live”. The issues covered in this section are all extremely important and highlight the many things that impact on our neighbourhoods and communities.

We highlight the importance of the economic performance of the home and think this needs to be considered within the planning reform process. Education for the community on household behaviours is critical to ensure built environment outcomes continue to respond to shifts in our environment as they are used by their occupants over time.

We urge Government to recognise the value of trees as an essential ingredient to the quality of our parks, streets and other public spaces, and for their contribution to the health and well-being of our communities. Trees are valued for the environmental, cultural and economic benefits they provide to local public spaces, as well as the cumulative benefits of trees towards more resilient and sustainable neighbourhoods. The development of Landscape Design Standards will be critical to incorporate the right trees to influence overall development outcomes.

We urge Government to consider placing a dollar value on trees as assets to reinforce their importance to our environment and economy. Doing this could assist with determining funding for offset schemes, influence higher penalties for un-approved tree removals and, with other tools, contribute to incentivising the retention of trees on private allotments.

## **Indigenous Recognition**

AILA SA believes it is critical that Aboriginal people take a leading role in managing natural resources in our State. AILA has recently launched a Reflect Reconciliation Action Plan (RAP) demonstrating our commitment to creating an inclusive and diverse profession by encouraging and supporting our members to expand their cultural awareness of Aboriginal and Torres Strait Islander Peoples. [Click Here for a copy of the AILA RAP](#). AILA strongly supports indigenous people being recognised in the governance and planning processes, given their extensive history and connection to the land and their sustainable management practices honed over thousands of years.

Indigenous knowledge and ongoing cultural practice has much to offer other policies in development of mutually respectful and evolving processes for assessment and development of policy interpretation and outcomes. Cultural understanding will benefit our entire community and have a positive impact on the liveability of our city. We encourage DPTI to engage broadly with indigenous people as key professionals to inform the detailed development of policies relating to many areas of the new planning system in SA.

**Detailed Feedback in Response to Discussion Paper Questions**

Please refer to Attachment A for detailed response to the consultation questions.

We thank you for the opportunity to provide feedback and commend DPTI on this important work. AILA would also be available to meet with your Department to discuss in more detail and look forward to your reply in response to our submission.

Please contact me if you have any questions or contact Sally Bolton – AILA SA State Manager by email - [REDACTED] if you require any additional information.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Willsmore', with a long horizontal flourish extending to the right.

Ben Willsmore  
**AILA SA State President**

## Attachment A: Detailed Feedback in Response to Discussion Paper Questions

### THEME 1: Sustainable and Liveable Urban Environments

#### 1.1 Green Infrastructure and Water Sensitive Urban Design

##### **Should existing WSUD and GI policies also apply to regional areas and for all development scales and types?**

Yes. As detailed above there is a need for a holistic Government led Green Infrastructure Strategy. This strategy would highlight different types of green infrastructure and how it can be applied in different settings.

AILA SA believes that a Green Infrastructure Strategy supports the classification of green infrastructure to be formally recognised as an asset class to be valued in business case development for major projects within our communities.

The green infrastructure strategy should set the direction for broader regional landscape management and restoration in SA.

Green Infrastructure policies need to look broadly at how State Government and then Local Government funding is generated and distributed to improve planting in road reserves and verges, local parks and other public realm. Policy needs to make the Planning and Development fund work harder and allow for a more equitable distribution of funding to appropriate areas.

A Green Infrastructure Strategy should visually depict where any deficiencies are in the early stages of project development. This would allow for assessment in relation to upfront spending and long-term investments, which is critical for many elements of Green Infrastructure at all scales and development types. This is especially relevant to trees – as they take time to grow and reach their potential (year 1 value for a tree is very different to the year 5 value) and investment needs to be assessed accordingly.

WSUD is an approach to Green Infrastructure and plays an extremely important role in the sustainability and water quality improvements of many developments. As with any form of GI, a strategy will assist in ascertaining the appropriateness of scale location, ability to maintain etc.

AILA SA believes WSUD should be mandated for large scale infrastructure projects, including road networks, streetscape upgrades, and rail and bus and tram infrastructure. Furthermore, there should be tighter controls for public realm projects to enable the integration of WSUD practices at a smaller scale.

Minimum requirements should also be introduced for private allotments with regards to WSUD and sustainable water use practices. This could incorporate requirements for capture and re-use, areas of permeable surfaces and offset requirements for the impacts on stormwater and sewer infrastructure that denser neighbourhoods are going to have.

We note that, often the bio-filtration basins provided by developers to offset their monetary stormwater quality contribution can be costly and problematic for Councils to

maintain.

## **THEME 1: Sustainable and Liveable Urban Environments**

### **1.2 Energy Efficient Design**

#### **What role should the planning system play regarding the preservation of sunlight to solar panels from adjacent developments?**

Sun shading modelling should be mandated at Development Application stage for larger (taller) developments with a perceived impact on limiting sunlight to adjacent properties.

Flexible arrangements should be considered to enable the relocation of existing solar panels, or provision of new panels onto an adjacent new building that will overshadow any neighbouring panels. This could include removal of any red tape that currently deters collaboration to achieve mutually beneficial efficiency and sustainability outcomes.

#### **Should the Code introduce incentives for developments that can incorporate passive solar design (siting) techniques, green infrastructure and WSUD?**

Yes. This has been successfully trialled in other states previously including Qld's Green Door Policy which fast tracked Development Application approval of projects that demonstrated good ESD practices.

The code could look at incentives for the retention of trees.

Protocols for incentivising development for private properties to look at different design options such as solar access, incentives for exploring design options to retain existing trees that aren't significant, larger fines for cutting down significant trees and minimum/maximum site coverage.

#### **How can planning policy contribute to reduced carbon emissions from the built environment sector?**

Incentives for ESD as described above and planning policy to encourage adaptive re-use rather than complete demolition.

## **THEME 1: Sustainable and Liveable Urban Environments**

### **1.3 Waste**

#### **How do we plan for current waste removal practices and technologies and provide flexibility for innovative future solutions?**

Policy needs to be written in a performance-based way to encourage new technology take up.

Policy should incentivise waste recycling and allow for flexibility for new recycling techniques into the future.

Increases to the refund on recyclables could help to boost the economic viability of recyclables.

## THEME 2: Water Security and Quality

No Comments

## THEME 3: Biodiversity

### **Can the Code protect biodiversity in areas not identified as native vegetation and in modified landscapes with biodiversity values?**

Yes incentivise retaining vegetation of biodiversity value in all areas. Requiring vegetation assessments as part of their planning application is essential to assist in this.

A green infrastructure strategy (as detailed in the general feedback section) should be produced for the state that spatially depicts areas of significance (ie river corridors + hills face zone + coastal + national parks + culturally significant sites) that should be used as an overlay (same as transport overlay + noise emissions overlay) to make developers / owners aware of the importance of these areas

Significant / Regulated Tree legislation needs to be strengthened. Continued weakening of this legislation including recent amendments in 2017 to allow any significant / regulated tree to be removed from within a state school without a DA being required is counterproductive to all other efforts to preserve and enhance biodiversity and increase tree canopy across the state.

The code needs to recognise the value of backyard biodiversity and what is at risk if this disappears as our communities densify. Developments need performance-based indicators and elements to ensure adequate design responses in relation to private space. Baseline information is critical to guide targets for maintaining, expanding and protecting biodiversity within our communities and environments.

Streets, trees, verge vegetation and backyards provide significant opportunity for biodiversity hotspots, wildlife etc.

Public open spaces also provide significant opportunity for biodiversity and this needs to be prioritised in Local Government policy and a broad Green Infrastructure strategy for our State.

### **Can planning policy assess the cumulative impact of development on biodiversity?**

Yes currently DA's for significant tree removal could be mapped to show impact over the last 2, 5, 10 years.

In the future a Green Infrastructure Strategy could be used to map and set a baseline, then set targets for improving / maintain biodiversity across Adelaide.

### **Can planning policy play a role in protecting and encouraging backyard biodiversity?**

Yes incentivising the planting of large trees through the provision of areas for deep root soil zones in all new development. The opportunity for deep soil zones in private gardens would allow for increased tree planting that could also contribute to backyard biodiversity,

streetscapes, contributing to a more appealing environment to encourage stronger opportunities for social interaction and sense of place and community, as well as improving local microclimatic outcomes.

Planning Policy should also incentivise retaining vegetation of biodiversity value in all areas.

As our neighbourhoods are increasingly losing private open space through higher density development Planning Policy can also play a significant role through reassessing open space provisions. Without a sophisticated and nuanced recasting of Open Space in the legislative context, the new bold vision of The 30-Year Plan For Greater Adelaide: Living Adelaide will remain locked into an outmoded regulated concept of open space as a 12.5% quantum, irrespective of the needs of new communities or increased density.

**Do we need a policy to protect and encourage development of roadside vegetation?**

Yes and it could be picked up in a Green Infrastructure Strategy.

#### **THEME 4: Coastal Environments**

**What level of development (including accommodation) is appropriate for a Coastal Conservation Zone?**

There should be tighter controls on performance outcomes and contextual design in Coastal Conservation Zones, including materiality, ground impacts and appropriate use and shading of west-facing glazing.

**Does current planning policy adequately address the risk of new development from climate change impacts (coastal retreat, sea level rise and storm surges, etc.) for at-risk coastal settlements?**

Policy should be informed by investigation on a resilience strategy and what projected impacts might be to inform what policy may need to do into the future.

Regional Climate Change Adaptation Plans including: Resilient North, Resilient South Resilient East and Resilient West could be reviewed to identify areas for a coordinated and collaborative response to climate change across all the regions.

Studies should be undertaken in relation to rising sea levels to inform any potential development.

#### **THEME 5: Natural Hazards**

**No Comment**

## THEME 6: Environment Protection and Public Health

**Should cumulative noise impact assessments be undertaken as part of the development assessment process?**

No comment

**How can policy effectively address the interface between land uses in zones promoting mixed land uses? For example, a coffee roaster adjacent to a residential development in an urban corridor.**

No Comment

### **General Feedback for Theme 6: Environment Protection and Public Health**

Please refer to our general feedback at the beginning of this submission in relation to the health and well being of our communities and the critical role Green Infrastructure has to play in Environment Protection and Public Health.

AILA SA also brings to your attention the Healthy Parks Healthy People – Action Plan 1 - Realising the mental health benefits of contact with nature. [Click Here](#).