

SUBMISSION ON DRAFT PLANNING AND DESIGN CODE: PHASE 3 (URBAN AREAS)

PARKS & LEISURE AUSTRALIA SA/NT

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cc to Hon Stephen Knoll MP, [REDACTED]

Parks and Leisure Australia represents professionals working in the fields of parks and leisure, including open space, recreation, sport and the environment. Many of our members work in Local Government or as planning and management consultants and providers. Whilst the Draft Planning and Design Code: Phase 3 (Urban Areas) primarily relates to urban development, the outcomes associated with the Planning and Design Code have a high impact on the environments that our members plan for and manage, and the environments that our communities live in.

This submission by Parks and Leisure Australia SA/NT focuses on those items that relate to our industry and the environment in general, and this includes items that relate to:

- Landscaping and the requirements for trees
- Policies and requirements relating to open space and recreation
- The liveability of neighbourhoods (through trees, shade, open spaces)

The overriding key messages that Parks and Leisure Australia SA/NT is making through this submission are:

1. Green urban environments achieved through both private and public land and developments are essential to contribute to the creation of appealing and liveable neighbourhoods, support active and engaged communities, increase tree canopy, strengthen biodiversity and provide habitat, contribute to mitigating climate change and achieve cooler environments and streetscapes.
2. Housing developments must incorporate adequate private open space that includes usable landscaped areas with the capacity for large and medium trees (existing and new) and other soft landscaping. This includes requiring smaller allotments and apartment developments to have adequate private green open space.
3. There must be sufficient allocation of quality public open space and recreation opportunities by developers, including in medium and higher density areas. This includes the requirement for walkable streetscapes, usable parks and tree planting and landscaping.

Parks and Leisure Australia SA/NT is a member of the Healthy Parks Healthy People SA Quality Green Public Space (QGPS) Reference Group and we also support the following statement determined by all of the reference group members.

The Healthy Parks Healthy People SA, Quality Green Public Space (QGPS) Reference Group is a collective of partner organisations with an interest in promoting the critical importance of the protection, provision and improvement of quality green public space in a densifying urban environment. As urban infill continues to dominate new forms of residential development in South Australia, we are seeing continued decline in private green space and tree canopy. This will create irreversible and damaging impacts for climate resilience, biodiversity, and human health and wellbeing.

The members of the Healthy Parks Healthy People SA, Quality Green Public Space Reference Group broadly support the inclusion of WSUD principles, private green space and tree planting provisions in phase three of the Draft Planning and Design Code.

Urban greening plays a critical role in protecting people and property from extreme weather events such as heatwaves and storms. It is vital that the water sensitive urban design and green urban areas are embedded into planning and development at every scale. Green urban areas are known to foster and enable direct and meaningful experiences with nature, which can be transformative for: the physical and mental health outcomes of individuals, the development of children, strengthening personal relationships with family, building safer and better connected neighbourhoods, developing a strong economy, and nurturing environmental attitudes and values in the community.

Whilst Parks & Leisure Australia SA/NT supports the broad principles of the State Government’s planning reforms, including the commitment to achieving quality urban development that reduces urban spread, there are some items within the Draft Planning and Design Code: Phase 3 (Urban Areas) that we believe should be reviewed or strengthened.

Our main comments and the related sections in the Draft Planning and Design Code: Phase 3 (Urban Areas) are summarised below. Our comments are strategic and do not aim to provide specific feedback on the complex development criteria and policies as we are not development planners and our greater interest is in the higher level implications and opportunities of the Planning and Design Code for Urban Areas.

Specific Comments

Topics	Comments	Related Sections
Environment	The natural environment should have its own overlay rather than being grouped with food production. These are two very different aspects of urban areas and the natural environment justifies its own overlay given the importance of the environment.	Environment and Food Production Overlay
	The focus of policies and practices that respond to and mitigate climate change should be strengthened, including as part of a separate environment overlay and through the open space zone policies.	Environment and Food Production Overlay Open Space Zone
Private Open Space	The amount of private open space required is not adequate for a number of the site sizes and the calculation is not consistent, e.g. a site of 500m ² requires the same space as 300m ² . A consistent 20% of land area is recommended.	Design in Urban Areas
	Apartment complexes should be required to incorporate a land area for communal outdoor green open space in addition to the individual private open space required. 15%-20% of the site area is suggested.	Design in Urban Areas
	The individual private open space for 2 and 3 bedroom apartments is very low and would not support family living.	Design in Urban Areas

Specific Comments

Topics	Comments	Related Sections
Public Open Space and Recreation	The Design Outcomes in Design in Urban Areas are very important and supported. In particular the requirement for developers to 'integrate landscape design to optimise pedestrian and cyclist usability, privacy and equitable access, and also promote the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors alike' should be promoted and reinforced in the Zone policies and Overlays to ensure this is achieved.	Zones and Overlays Design in Urban Areas
	The desired outcome does not fully reflect the outcomes that the industry believes are important for public open space and recreation. It is recommended that the desired outcome is changed to the following: 'Diverse, appealing, functional and accessible open spaces, linear connections and recreation facilities that support active and informal recreation and enhance the character and environmental balance of urban areas.'	Open Space and Recreation
	The importance of incorporating natural features and settings within public open spaces, including large and medium trees that provide good shade, natural grasses and soft landscapes, should be strengthened within Open Space and Recreation.	Open Space and Recreation
Soft Landscaping	The required amount of land for soft landscaping between the road boundary and the primary building line would be ideally be greater than 25% and greater than a minimum of 0.5m dimension. This does not support green neighbourhoods and a minimum provision of 30% or 35% with 1m dimension would be a suggested. Note that the dimension differs for Housing Renewal (1.5m) which suggests there is an inconsistency.	Design in Urban Areas Housing Renewal
	The soft landscaping definition should specifically exclude synthetic grass and hard surface paving and structures that are not pervious.	Administrative Definitions
Biodiversity	A greater emphasis should be placed on achieving and maintaining biodiversity through the Zone policies and the Assessment Provisions. The native vegetation overlay should highlight the need to create natural settings that have a strong biodiversity focus and provide some examples of this.	All Zones Native vegetation overlay
	There should be greater protection of existing biodiversity and habitat areas that have high environmental and social value.	Open Space Zone Recreation Zone Native vegetation overlay

Specific Comments

Topics	Comments	Related Sections
Trees	The Planning and Design Code (Phase 3) should be used as an opportunity to increase tree canopy and contribute to the greening of cities, suburbs and towns. This will help reduce the heat island effect of housing development and contribute to mitigating climate change and carbon emissions.	Various Zones and Overlays and Policies
	There should be a greater requirement to protect existing larger trees and plant additional trees as part of housing developments, including in Housing Renewals and around higher density developments and apartment buildings. The loss of larger and character trees due to the demolition of existing housing should be deterred.	Housing Renewal Design in Urban Areas
	The land requirements to support tree planting and landscaping are considered to be too low and should be: <ul style="list-style-type: none"> ▪ At least 10% of the site for minimum deep soil area (based on 20% being allocated for private open space) ▪ At least 2 larger trees for sites greater than 1500m² ▪ Larger minimum dimensions for tree/ deep soil zones to allow for a requirement for more trees and landscaping 	Design in Urban Areas
	There should be a requirement in the Code that ensures developments do not involve the removal of or impact on existing street trees or the landscape character of a streetscape.	Suburban Main Street Zone
	As part of greening public places, there should be a requirement for tree planting in outdoor car parking areas (open air public car parks, shopping centre parking, outdoor parking around commercial developments) and tree planting to alleviate hard surface outdoor public realm spaces (including outdoor shopping malls and restaurant areas).	Traffic Generating Development Urban Transport Routes Overlay
	The protection and retention of significant and regulated trees should be greater through the Planning and Design Code, with a greater emphasis on a tree's biodiversity and habitat value, character and visual contribution, indigenous relationship to the local area and amenity value (shade, cooling effect). There should be clear and limiting criteria for when the removal of a regulated or significant tree might be considered.	Regulated Tree Overlay Significant Tree Overlay
	The need to provide spaces for trees including non-regulated trees to provide shade, cooling and greening, should be included in each of the Zones that relate to housing or commercial development.	All Housing and Commercial Development Zones

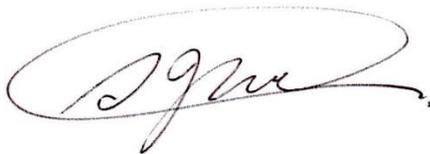
Specific Comments

Topics	Comments	Related Sections
Water Sensitive Urban Design	There should be an overlay on Water Sensitive Urban Design or this should be further incorporated and explained within the Design in Urban Areas section. Water Sensitive Urban Design needs to be strengthened throughout the Code.	Design in Urban Areas
Housing Development	Requirements relating to environmental initiatives such as tree planting, rainwater tanks and water quality appear to be lacking for Housing Renewal.	Housing Renewal
Universal Design	There does not appear to be a strong focus on the importance of universal design, the accessibility of public open spaces, pathways, streetscapes and facilities, and the need to meet Disability Discrimination Act requirements. This should be strengthened throughout and particularly where there is any relevance to public open spaces, the public realm and community facilities.	Various Zones and Overlays and Policies Open Space and Recreation

Parks and Leisure Australia SA/NT recognises that the Draft Planning and Design Code: Phase 3 (Urban Areas) is a large and complex planning tool and we understand that there will be some gaps and opportunities for enhancement in the Draft document.

As such, we thank you for the opportunity to make this submission and hope that our suggestions and feedback will be given appropriate attention. We will look forward to your response.

Yours sincerely



Suzanne Suter
President, Parks & Leisure Australia SA/NT

27 February 2020