



20 September 2018

## ***Response to the DRAFT State Planning Policies for South Australia***

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

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.

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 previously provided industry contribution towards the Planning Reform, Planning Development and Infrastructure (PDI) Bill, 30 Year Plan for Greater Adelaide Update, Design Guidelines, Stage 1 and Stage 2 Draft of the Community Engagement Charter, the Introduction to Technical Discussion Paper - Future land use definitions and classes and most recently the Accredited Professionals Scheme – Discussion Paper. [Click here](#) to review these submissions.

AILA SA welcomes the opportunity to comment on the DRAFT State Planning Policies for South Australia and we are grateful for the engagement process being undertaken by the Department. We provide the following feedback in relation to the sixteen policies.

### **General Feedback**

AILA is supportive of the State Planning Commissions aspiration to set State Planning Policies (SPP) that will help *'respond to modern opportunities and challenges including how to create affordable living, design quality spaces to live and work, support industry, meet the challenges of climate change and become a more resilient South Australia.'*

AILA notes that the importance of the following 5 SPP's and their relevance to the PDI Act and Planning and Design Code, including:

- SPP1 Integrated Planning
- SPP2: Design Quality
- SPP3: Adaptive Reuse
- SPP 4: Biodiversity
- SPP 5: Climate Change

AILA is pleased to see a commitment to design in the draft Planning Policies. SPP2 Design Quality is a key policy that is central to improved future built works and processes of informed and inclusive delivery. It follows logically as the means to undertake integrated planning.

AILA supports the inclusion of Principles of Good Design, but encourages further refinement of the 6 principles to reflect a better understanding of the unique opportunities and challenges that face the South Australian context. This refinement may be the first important step towards the better spatial application of the planning policies.

Within SPP2, Policy 6 must make stronger statement towards the provision of high quality, functional and accessible private open spaces as well as public open spaces. The provision of quality private open spaces is critical to the quality of life for local residents, support for citywide greening, and mitigation of climate change, and as such should be strengthened in SPP4, SPP5 and SPP6.

The Policies touch on many areas of vital concern to our members and we would be happy to see stronger expressions of the value of biodiversity and other environmental assets. A stronger commitment to not only protect environmental resources, but enhance and actively restore and create future green infrastructure is desirable as a fundamental means to deliver on many related policies. These include climate change mitigation, reliable energy provision by reducing peak needs, coastal environment protection, water security and quality, natural hazard reduction, emissions and hazardous activity control, and even cultural heritage, knowing that Country lies at the core of indigenous cultural practices while environmental context directly affects the quality of everyday lived experience of all citizens.

### **Regional Plans**

To support the vision for planning and design in South Australia, and the desire for more certainty and consistency, a greater level of spatial application of the aspirations of the SPP is required. AILA, whilst supportive of the revised 30 Year Plan for Greater Adelaide, does not believe it provides sufficient direction to translate the opportunities and challenges facing South Australia.

The key to integration and achieving the desirable long-term impacts referenced across the 16 SPP's will lie with greater consideration of green infrastructure, and the quality planning and design of our urban environments that should aim beyond protection and preservation of existing assets. The necessary focus on green infrastructure to achieve policy outcomes is not clearly articulated and not aligned with the targets and ambitions of the 30 Year Plan.

We call for DPTI to prepare a green infrastructure strategy in collaboration with the Department for Environment and Water. The green infrastructure strategy should articulate how and where public open space should be provided in the future – building on the former Metropolitan Open Space System and documenting existing assets and planning status. The green infrastructure strategy should direct investment in development, infrastructure and open space and align the upgrade of existing public open space with targeted areas of infill development in our suburbs. It should also serve as a baseline for understanding our tree canopy asset and how resources can be best spent to meet our tree canopy targets to mitigate climate change. We refer DPTI to the NSW Draft Green Infrastructure Policy (Greener Places: Establishing an Urban Green Infrastructure Policy for NSW) which has been led by the NSW Government Architect as a benchmark document.

AILA SA would encourage greater consideration given to advancing the spatial application of the SPP's to give greater structure to the planning of regions and sub regions across Greater Adelaide. The local applications will provide supporting detail to the aims and expectations of the vision for planning and design in South Australia. A consistent approach to the structure of these plans should be considered, and built from the strategic planning documents of each local government, A better understanding of the strategic framework of local areas, including street networks, open space networks, infrastructure / asset management plans, and identification of business districts, main streets, education and employment zones, as well as natural resources, provide a co-ordinated and previously consulted base plan for the 16 SPP's to respond to. The localised applications, working with LGA's may enable more appropriate resolution of the potential for conflict or contradiction between some SPPs, as well as bridge the gap between 16 state wide policies and the development potential of an individual site.

### **Indigenous recognition**

AILA has recently launched a Reflect Reconciliation Action Plan 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. We believe that more could be done to include references to our local Kurna culture in the Draft State Planning Policies. While an expected reference is made in SPP7 Cultural Heritage, 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. This applies to SSP1 Integrated Planning, where integration could explicitly and usefully speak to aims supporting choice and for a cross-cultural integration necessary for liveability and positive informed development. An understanding and appreciation of Kurna culture could also be reflected in SSP2 Design Quality as a measure of considered value, as well as SSP9 Employment Lands where recognition of latent new cultural and tourism industries could be supported more explicitly as an outcome of support for a strong indigenous culture. Cultural understanding will benefit our entire community and have a positive impact on the liveability of our city.

In summary, AILA supports the aims of the SPP's and would encourage the finalisation of the policies to take into greater consideration:

- The importance of quality public and private open spaces in achieving the aspiration of the SPP's
- Greater recognition of the critical need to increase green canopy in public and private land to meet State targets, including the strengthening of protection for significant and regulated trees
- Increased commentary regarding the specific requirements of South Australia and greater Adelaide, in Good Planning Policy and the 16 SPPs
- Short term need to advance the spatial application of the SPP's in support of the high level position within each of the 16 policies, including utilisation of existing local government strategic and management plans
- Further strengthening of the recognition of Kurna and Indigenous associations and their connection to lands across South Australia in the overarching Policies

We look forward to ongoing involvement in the finalisation of the Policies. Please contact me if you have any questions or contact Sally Bolton – AILA SA State Manager by email - [sally.bolton@aila.org.au](mailto:sally.bolton@aila.org.au) 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**