



6 November 2023

Craig Holden
Chair, State Planning Commission
Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan Discussion Paper

Dear Craig,

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA) extends its appreciation to the State Planning Commission to provide feedback on the Greater Regional Adelaide Plan Discussion Paper.

About AILA South Australia

AILA SA leads a dynamic and respected profession, creating great places to support healthy communities and a sustainable planet.

We work together to create healthy communities, connected urban green infrastructure, and liveable, sustainable cities and regions. Our 2,900+ members are driven by AILA's Strategic [Plan](#) core values of Connection to Country and Climate Change, and are committed to creating ***'A greener, healthier, inclusive and climate resilient South Australia'*** which is further embedded in our advocacy approach.

The work of South Australian landscape architects is recognised for creating liveable cities, healthy active spaces, and sustainable design outcomes for everyone. Our 200+ South Australian members have helped shape many projects across the State, creating the vibrant community spaces for all.

AILA SA's advocacy

AILA advocates leading positions on issues of concern to our cities, suburbs and regions on matters regarding landscape architecture. We prefer to work alongside government to improve the design, planning and management of the natural and built environment.

Prior to the GARP Discussion Paper release, our principal objective has been to protect and enhance existing South Australia's Significant and Regulated trees and the provision of integrated green infrastructure. As part of our collaborative approach, we have joined with the Conservation Council of South Australia and prepared the following publications:

- [Comparison of Australia's Capital Cities Tree Laws \(2022\)](#)
- [Comparison of Australia's Tree Laws \(2021\)](#)
- [Myth Busting Our Trees 2021](#)
- [A Call to Action: Protecting Adelaide's Tree Canopy \(2021\)](#)

Our own Advocacy Manifesto, attached for your information, focuses on positive improvements to protecting, enhancing and creating a more sustainable and inclusive South Australia, including:

1. Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.
2. Protecting South Australia's Trees



3. Improving South Australia's connectivity by creating better streets for people.
4. A new approach to Designing on Country.

We also note there are a range of issues that were heightened during the recent worldwide pandemic, and these include:

- equitable and safe access to quality, local, and green parks and open spaces
- equipping our cities, towns, and regions to be climate resilient in a warming, dry climate
- supporting more people walking and cycling
- authentic and effective reconciliation with First Nations people

Feedback on the GARP Discussion Paper

We held a AILA SA Member Roundtable with a large cohort of our members to prepare our response to the Discussion Paper, which was well attended from all sectors (private, public and education practices). This has informed our submission, acknowledging the two key parts of the Discussion Paper:

1. How should Greater Adelaide grow?
2. Where should Greater Adelaide grow?

Our recommendations for consideration by the State Planning Commission are:

Recommendation 1

Meaningful acknowledgement, engagement and collaboration with First Nations

We recommend that First Nations form an underlying part of the GARP using a Connecting with Country approach.

We recommend a genuine and meaningful partnership promotes positive outcomes, ensuring that future developments are inclusive and respectful of the land, communities, and cultural history, and relevance within our green publicly accessible open spaces.

We recommend an agreed approach to cultural mapping underpin the GARP to ensure the development of growth areas are culturally sensitive, provide environmentally responsible outcomes, and preserve natural systems.

We recommend an authentic and inclusive acknowledgement of traditional owners throughout the GARP, advancing respectful and authentic reconciliation through the design of our places, links to the cities and connection to the regions.

Recommendation 2

Celebrate and represent the context and character of the regions through the development of clear and concise regional Visions

Each region in South Australia is uniquely different, and the GARP could include an agreed and informed character of each region. Our feedback is that development types are not generally applicable across all regions, and what may be appropriate in the northern regions will not be appropriate in southern or central regions.

Therefore, a clear and concise long-term vision over a 15-to-30-year period is required to shape development within South Australia.



We recommend the development of a region-specific visions – incorporating character and context - celebrating the best of the broader Adelaide Plains (celebrating our ‘Adelaide-iness’) - would ensure high quality and site-appropriate development.

We further recommend that two key questions are posed within the GARP for sustainable long-term growth and to direct how and where Greater Adelaide should grow, which may help with community engagement:

- *what is the future of the regions?*
- *who are the regions for?*

Recommendation 3

Develop a concise, aligned and strategically integrated plan

There is a lack (or apparent lack) of integration across Government department strategies including planning, transport, infrastructure, climate change, greening. The GARP represents an opportunity respond and provide a concise, aligned and strategically integrated plan.

Greater policy alignment and government investment and partnership opportunities with local government could enable greater and high-quality development opportunities along the proposed spines and accommodate for growth within existing corridors and precinct. This would also enable greater density in the inner suburbs - small-scale, low multi storey development (i.e., three-storey apartments), an effective way to increase housing supply and allow space on small blocks for green infrastructure and WSUD.

AILA SA defines green infrastructure (GI) as ‘...the strategically planned networks of natural and semi-natural areas in urban and regional settlements that provide environmental, social and economic benefits to society... GI strategy aligns with an ecosystems management approach to provide ecosystem services that can be measured, evaluated and deployed at a landscape scale; transcending private and public land, geographic and municipal boundaries.’ (Australian Institute of Landscape Architecture (AILA), 2019. Green Infrastructure. Position Statement).

The GARP should embed green infrastructure as an essential component of greener, wilder, healthier, and climate resilient places for all.

We highlight that fundamental change is required in the planning and design of private development that provide greater requirements for protection of existing onsite trees, and mandates practical space for trees of a size than can make a meaningful contribution to the urban canopy cover.

We recommend a key focus of the GARP should be how the interrelationship between government agencies, local government and private development align to deliver improved outcomes for all and therefore support ‘living locally’ principle within the GARP.

We are not recommending the GARP incorporates every measure and target across government, more alignment of policies and strategies where possible.

Recommendation 4

Provide clear and measurable targets supported by benchmarking

We recommend that the first part of any strategy is a review and analysis of the objectives and targets outlined in past Strategies and how those Strategies have performed to enhance South Australia.



The GARP will guide land use planning and development action over a 15-30 year period, including the integration of land use, transport infrastructure and the public realm and therefore a critical strategy.

Liveability and quality of urban environments correlate to the health, wellbeing and socio-economic prosperity of individuals and communities. Good design outcomes should continue to be an integral driver shaping the future of Greater Adelaide, and precincts and neighbourhoods should be designed holistically, incorporating services, amenities, accessible open and recreational space, civic, residential and commercial areas. This objective – of living locally – requires an integrated planning approach for both infill and greenfield development.

Our exhaustive analysis suggests the following targets are considered, or at least investigated, for inclusion in measuring the success of the GARP (in no particular order):

1. Prioritise infill development and commit to a target of infill housing vs. greenfield housing to provide accountability and provide stronger wording to prevent development in environmentally sensitive or unsuitable areas. Limit the footprint of metropolitan Adelaide.
2. Retention of existing trees, vegetation and environmentally sensitive land should form a critical priority for all new development, as should canopy targets for tree planting on public and private land.
3. Incorporation of connected, quality green open spaces, with a focus on biodiversity, should form a core objective of any new development.
4. The incorporation of mandated green infrastructure targets and standards at all levels of policy, and subsequent inclusion in projects, will provide critical uplift in maximising the benefits of a dedicated green infrastructure investment. There is a new Australian Standard for integration of [Urban Green Infrastructure](#) that could be referenced.
5. There is no mention of other greening other than tree canopy targets – the GARP would benefit from targets already established – and we draw attention to the Department for Infrastructure and Transport's [Green Infrastructure Commitment](#) which has clear targets that could be applied to new developments.
6. Urban greening targets set by the State Government will not be met with the standards and expectations set out in the Planning and Design Code and the lack of protection provided to existing urban tree canopy. The target for growth set out in the GARP will risk accelerating the decline of the urban tree canopy further, without a more nuanced and site-based approach. Clear felling of existing trees on new development sites is what we are concerned with.
7. The GARP could consider alignment with the Environmental Protection Biodiversity Conservation (EPBC) (1999) Act, which lays out Ecologically Sustainable Development for biodiversity conservation. This could form part of the review of the MOSS as well as protecting existing ecosystems by rehabilitating areas affected by development and avoiding incremental habitat loss is critical to address and ensuring that new communities target biodiversity gain.
8. For key sites, the State Government could take a more active lead in maximising long term outcomes for wider community benefit. The recent leadership demonstrated by Renewal SA with the LeCornu, Forestville site mandated a requirement for 15% open space as part of the site planning. This supports the State's Living Locally and Urban Greening aspirations. In contrast, the sale of Julia Farr site by Renewal SA did not consider any site master planning requirements or strategic aspirations. This may limit the long-term strategic outcomes that could be achieved on the site.
9. Real and measurable walking and cycling targets – ie an active transport strategy that captures the targets in the current strategies – as an embedded requirement for connected communities and reducing car dependency. This could include using the Transport for London's [Pedestrian Comfort Guidelines](#) to establish suitable walking infrastructure. The DIT [Green Infrastructure Commitment](#) also has a target of 50% tree canopy cover to all walking and cycling paths.



10. Increasing walkability to frequent and high-quality public transport is missing in the GARP. We recommend this is a critical and disappointing omission and must consider integration to ensure social equity as well as environmental and net zero targets are achieved.
11. The State Government has an existing [Water Sensitive Urban Design Strategy](#) which has a range of targets that could apply to new developments.
12. Consider increasing the proportion of mixed-use precincts and projects, as well as alternative housing models including minor secondary/ancillary dwellings on existing blocks, rent-to-own and not-for-profit development models, and retrofitting of previously commercial or industrial buildings to create residential or mixed-use precincts and projects.

Recommendation 5

Protect and enhance greening through a core objective of connected, accessible green spaces

A greener, wilder and climate resilient environment is an important aspiration, but concern was raised that current development patterns are the primary cause of loss of green canopy across greater Adelaide.

Without deliberate intervention of State Government, it is likely the directions set in GARP based on the current planning framework will result in a less green and less wilder communities that are significantly impacted by long term climate change.

A more equitable and socially cohesive place is a very broad statement and could be interpreted with a number of values. Creation of strong sense of place through integrated and supported neighbourhoods, should be a fundamental for the GARP. This requires an awareness across Government to work with Councils and developers to invest in the public domain and the creation of spaces for the community, not at the expense of the developer.

We ask for clarity surrounding the timing and integration of the Greening Strategy – this has been on Green Adelaide’s agenda for more than 2 years – is this the foundation for the GARP and review of MOSS? We would be keen to understand more noting the Minister is keen on our creeks and rivers as linear parks connecting places, as well as protecting and enhancing biodiversity.

We recommend the GARP establish a maximum walking distance and/or time to quality local open space.

Further, and through the MOSS review, the GARP could establish ecological corridors connected by active transport corridors to underpin the aspiration of living locally?

We note the retention of existing trees, vegetation and environmentally sensitive land should form a critical priority for all new development, as should canopy targets for tree planting on public and private land.

Recommendation 6

Embed principles of connectivity and mobility within the aspiration of Living Locally

Our members unanimously expressed a strong concern at the lack of public transport integration in the GARP, noting the Discussion Paper is basically silent on integrated transport and land use planning.

We remain concerned that connectivity and mobility need to form a key outcome in the GARP, as it will embody the aims of the SPPs, the Commission Chair’s message, and the ODASA Principles of Good Design.



For the purposes of the GARP, we recommend connectivity and mobility includes:

- creating development with integrated active transport infrastructure,
- prioritising proximity and connection to existing and planned amenities, open space and services, and
- ensuring adequate public transport options are accessible to all development precincts and projects.

We also note that Infrastructure SA has released a Discussion Paper that is out for comment, and we note with concern that the GARP is not mentioned until p23 of the ISA report. This is at best an oversight and could be an example of a lack of cross government alignment. We are concerned as transport is missing in the GARP and our members agree this is the biggest failure of the GARP.

Within established neighbourhoods, there is greater requirement for the planning of individual sites to accommodate for multiple functions such as provision of shopping and services with a range of housing types. They also require a quality of design and open space planning to ensure they make a positive contribution to the sense of place and encouraging greater connections.

The approach to understanding Infrastructure costs is commended. It is important that infrastructure costs consider wider network requirements rather than development associated costs only. Greater understanding and accountability for road infrastructure projects is required to balance the provision of vehicles and freight, with mass public transport as well as walking and cycling infrastructure. The infrastructure costs should consider the aspiration of the trends, outcomes and living locally principles set out in the discussion paper.

The GARP should recognise these key assets as driver to 'living locally' and reconsider its role in the urban form to bring the vision to life.

Recommendation 7

Reconsider the 'spines' as part of an integrated transport vision

The 'spines' form the core of the GARP, and we recommend there is a rethink on this concept.

It appears the spines revolve around key roads which we believe is outdated thinking and will not achieve the state's net zero targets.

Our members expressed several views that Greater Adelaide must not grow based on a mindset of private vehicles and building bigger roads, it is an unsustainable outcome which compromises or contradicts the principals and directions set out in the discussion paper.

Increased private traffic demand will significantly impact the cost of living for those living further out into regional developments, will significantly increase emissions and accelerate the effects of climate change, and drive further congestion along growth corridors and will become a barrier to 'living locally' aspiration of corridors and infill suburbs.

We believe there is an opportunity to rethink the spines as future integrated public transport hubs – and this could be linked to living locally, and creation of stronger outer suburban centres/villages. When coupled with a review of the state's Greening Strategy and MOSS, the integration and future vision becomes more integrated and cohesive, as well as greener and inclusive.

We further recommend that there is an emphasis for all developer led and infill projects to ensure project planning and scoping of projects creates better streets for people, habitat and biodiversity, as well as new



and existing communities. Moving beyond minimum requirements is the aim - ensuring universally accessible and enjoyable journeys for all are achieved. For example, using the Transport for London 'Pedestrian Comfort Level Guidance' for all state funded infrastructure, health, and education projects place pedestrian comfort at the centre of decision making, to encourage greater walking across our cities and regions

Summary

Our seven strategic and important recommendations are based on many years of active and positive advocacy from AILA and our members across Adelaide and South Australia for improvements to the Planning and Design Code over many years.

I would like to thank you again for the opportunity to meet and discuss our recommendations in person on the 27 October 2023, before lodging this formal submission.

We are looking forward to continuing the discussion surrounding the vision for Adelaide, designing with Country and benchmarking to build better communities.

Yours sincerely,

Dr Janelle Arbon, Fellow (AILA), Registered Landscape Architect
President, AILA South Australian Chapter



Australian Institute of
Landscape Architects

South Australian Advocacy Manifesto 2023:
Australian Institute of Landscape Architects Manifesto

'A greener, healthier, inclusive, and climate resilient South Australia.'

Landscape Architects live and work on the lands of Kaurna people, Peramangk people, Ngarrindjeri people, Nukunu people, Narangga people and for all First Nations people across South Australia.

We care deeply and recognise their connection to Country.

We value walking side-by-side with all First Nations people and we acknowledge our role in advancing respectful and authentic reconciliation through the design of our places, cities and regions.



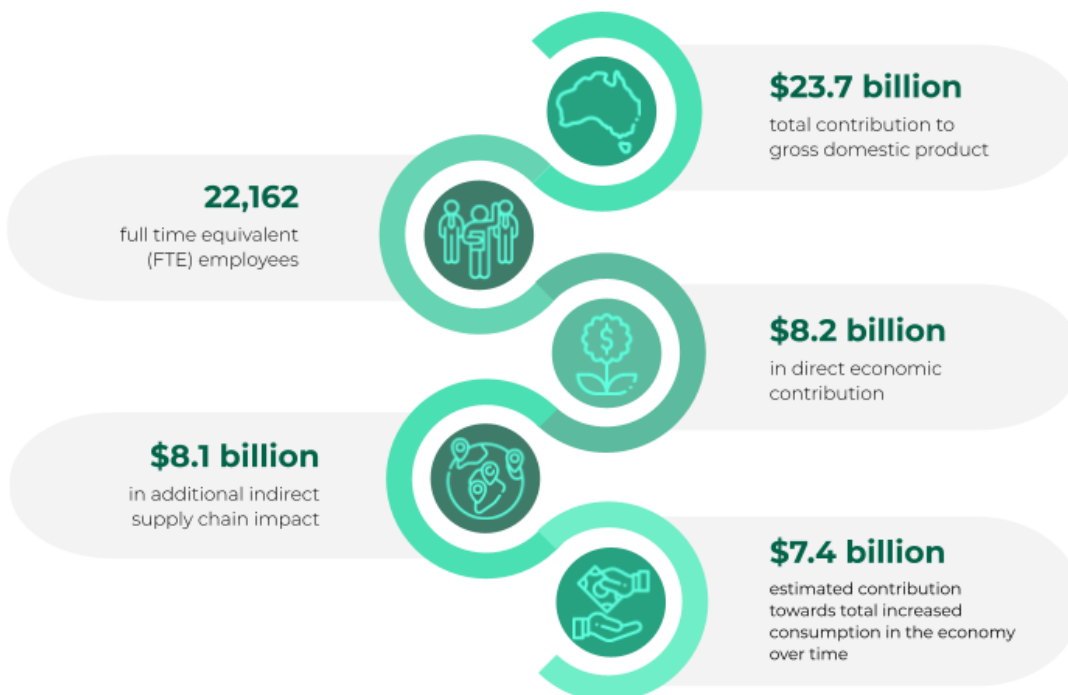
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Australian Institute of
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Shaping better places: the contribution* of the profession of landscape architecture to Australia's economy:



Additional benefits of

WELL DESIGNED SPACES

Landscape architects generate additional economic, environmental, social and cultural benefits as a result of their work in the design, construction and maintenance of private and public use spaces.



*Draft Economic contribution of landscape architecture industry report, AILA, 2022 (soon to be released).



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A greener, healthier, inclusive, and climate resilient South Australia



Australian Institute of
Landscape Architects

The Australian Institute of Landscape Architects, South Australia (AILA SA) leads a dynamic and respected profession: creating great places to support healthy communities and a sustainable planet.

We work together to create healthy communities, connected urban green infrastructure, and liveable, sustainable cities and regions.

Our 2,800+ members are driven by AILA's values and our advocacy, driven by our [Strategic Plan](#).

Our Values

1. Climate Positive Design

AILA is committed to supporting our members to achieve Climate Positive Design outcomes. **We adapt with our planet.**

2. Connection to Country

AILA is committed to creating an inclusive and knowledge-diverse profession by encouraging cultural awareness of First Nations people across Australia. **We believe in authentic, practical, and genuine reconciliation.**

3. Gender Equity

AILA is committed to lead a profession that is inclusive, diverse, and equitable for all. **We believe in equal opportunities.**

Our Advocacy

1. Healthy Communities

We advocate for the role parks and open spaces to support people's physical and mental well-being.

2. Urban Green Infrastructure

We advocate for connected open and green places and spaces to improve social, cultural, economic, and environmental outcomes across Australia.

3. Liveable Cities and Regions

We advocate for the critical role open and green spaces play creating culture, belonging, safety, identity, and liveability in our increasingly dense and globalised cities and regions.



AILA South Australia Advocacy Manifesto

A greener, healthier, inclusive, and climate resilient South Australia



Australian Institute of
Landscape Architects

The Australian Institute of Landscape Architects, South Australia (AILA SA), has been advocating and working with South Australian Governments for over 20 years.

We support positive policies, strategies, and projects that achieve our values and advocacy to create greener, healthier, and climate resilient places for all.

AILA SA calls for the adoption of a range of measures to achieve better lives for all South Australians.

Our state-building priorities are a summary of our advocacy over the last two years on a range of issues.

We are seeking support for four positive priorities:

- 1. Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.**
- 2. Protecting South Australia's Trees**
- 3. Improving South Australia's connectivity by creating better streets for people.**
- 4. A new approach to Designing on Country.**





A greener, healthier, inclusive, and climate resilient South Australia

1. Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.

1.1. New Green Infrastructure Office

A new single agency with the responsibility to plan, manage, and monitor the design of South Australia's green spaces.

It will have oversight of green aspects of all state-funded infrastructure, health, and education projects to ensure greening targets are initiated delivered, managed, measured, reported and protected over time.

1.2. New State Green Infrastructure Policy

A cohesive green infrastructure policy is developed and owned by the new Green Infrastructure Office with targets and reporting, supporting Green Adelaide and South Australia's Climate Change Action Plan.

1.3. Defined, agreed, and measurable targets

- Minimum tree canopy cover targets - currently 20% in the State's 30 Year Plan for Greater Adelaide
- Minimum tree canopy retention targets
- Minimum targets for new areas of quality green open space
- Minimum targets for stormwater retention, reuse and treatment
- Minimum targets for biodiversity and habitat increase
- All new State Government-funded capital projects must include these targets, form part of their project briefs, and be mandated for delivery
- Builds on the recently announced 'Green Infrastructure Commitment' by the Department for Infrastructure and Transport.

South Australia's leadership in climate change and mitigation must ensure state-funded projects pull their weight - in many instances there is confusion, value management and only passing acknowledgement of state greening targets.

The new agency will positively work with infrastructure, health and education departments to better shape greening outcomes.

2. Protecting South Australia's Trees

2.1. Law reform

Bringing South Australia into line with similar jurisdictions (as outlined in [this report](#)) in Victoria and New South Wales by changing the definition of a Regulated tree to one that:

- has a trunk circumference of 1m or more measured 1m above the ground, or
- has a height of 6m or more, or
- has canopy of over 9sqm.

2.2. Remove current exemptions

Remove the series of exemptions to planning regulations introduced in 2011 that allow the removal of mature trees without approval, including the 10m rule and the 20m rule.

2.3. Restore requirements for consultation on Government funded projects

Restore the requirement for the Department of Infrastructure and Transport and the Department for Education (and other relevant government agencies) to conduct consultation and planning approval before the removal of regulated and significant trees.

2.4. Mandate the Tree Offset Scheme to reflect the true value of trees

Mandate and increase the tree offset scheme fees to match the costs that are consequently passed on to Councils to plant, establish and maintain replacement trees, benchmarked against the City of Melbourne's *Tree Retention and Removal Policy*.

2.5. Improve the Planning and Design Code

Increase the number and size of trees required by the Planning and Design Code to be planted in new developments, with penalties or higher offset costs as outlined in 2.4 above.





A greener, healthier, inclusive, and climate resilient South Australia

3. Improving South Australia's connectivity by creating better streets for people.

3.1. Create a new Active Transport Plan

We recommend the creation of an integrated active transport plan, that sets agreed and measurable targets across South Australia, to provide connected, easy to access, and easy to use walking and cycling alternatives to private vehicle use.

This will build on the current State Cycling Plan and Walking Strategy, which are not coordinated and lack clear, cohesive, and agreed strategic and local outcomes.

The active transport plan is to be used as a key input to all state-funded infrastructure, health, and education projects to ensure walking and cycling connectivity is integrated and aligned with more effective public transport.

3.2. Ensure integrated streets

For all state-funded infrastructure, health, and education projects, ensure all project planning and scoping of projects creates better streets for people, habitat and biodiversity, as well as their new and existing communities.

This must be more than simply 'making good' - it means integrating active transport, greening targets, water sensitive urban design, habitat, biodiversity, and develop projects to become 'good neighbours'.

Moving beyond minimum requirements is the aim - ensuring universally accessible and enjoyable journeys for all are achieved.

For example, using the Transport for London 'Pedestrian Comfort Level Guidance' for all state-funded infrastructure, health, and education projects places pedestrian comfort at the centre of decision making, to encourage greater walking across our cities and regions.

4. A new approach to Designing on Country.

4.1. Authentic, genuine and meaningful partnerships with First Nations

Develop a new and collaborative design approach to First Nations involvement on all state-funded infrastructure, health, and education projects.

This must be a process that is funded, and acknowledges the difficulty in making time to meaningfully engage with First Nations.

We recommend new pathways and targets for First Nations Landscape Architects to be employed to help shape better projects and advance reconciliation in South Australia are included.



AILA South Australia Advocacy Manifesto

A greener, healthier, inclusive, and climate resilient South Australia



Australian Institute of
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Contacts

We would be pleased to discuss any aspect of our positive ideas for a better South Australia.

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Relevant Documents

The following South Australian documents are relevant to the priorities outlined in this manifesto:

- [South Australia Climate Change Action Plan](#)
- [Green Adelaide Regional Landscape Plan](#)
- [South Australia Integrated Transport and Land Use Plan](#)
- [Principles of Good Design, Office of Design and Architecture South Australia](#)
- [Creating Greener Places for Healthy and Sustainable Communities: Ideas for Quality Green Public Space in South Australia, Healthy Parks Healthy People, Government of South Australia](#)
- [Green Infrastructure Commitment, Department for Infrastructure and Transport](#)
- [Walking Strategy for South Australia](#)
- [South Australia Cycling Strategy](#)
- [A Call to Action: Protecting Adelaide's Trees](#)
- [AILA's Climate Positive Design Position](#)

