



## Australian Institute of Architects

September 2018

The Australian Institute of Architects SA Chapter value our opportunity to contribute in review of the draft State Planning Policies as part of our holistic planning reform agenda.

In order to maximise the effectiveness of our review as a professional representative body we have assembled a Planning Reform Task Force comprised of practicing local members who have been involved in this review. Positions on this task force were open to any interested members. We have also then made available to our full membership our draft responses for further comment prior to issue.

We view the State Planning Policies as a fundamental document in the system which will guide the policy outcomes throughout all future code and regulation drafting. For this reason we see the aspirational content of the State Planning Policies as important but also the nature in which they are drafted with specific definition of anticipated outcomes.

We submit that the drafting of these Policies need to be more outcome focussed with stronger frameworks for accountability in future works which is informed by these Policies.

Our Institute has determined to provide this feedback with two key parameters

1. We have reviewed all policies but selected only 6 specific policies for detailed response being those that are most relevant to our profession and where our experience and expertise affords the greatest value in feedback. These policies are: Integrated Planning, Design Quality, Adaptive Re-use, Housing Supply and diversity, Cultural Heritage and Strategic Transport Infrastructure.
2. We have provided feedback on the selected policies at a detailed editorial level, explaining our key objectives but then offering suggestions on specific alterations, deletions and inclusions to the text of the policies themselves.

We trust that our approach to meaningful review of the State Planning Policies will assist you with preparation of this important document and will be pleased to meet and further discuss at your request.

Sincerely,

**Mario Dreosti**  
Chapter President  
**Australian Institute of Architects - South Australia**

## Draft State Planning Policies for South Australia

State Planning Policy 1 : Integrated Planning	
Background:	Integrated planning policy will provide certainty about current and future development and ensure that economic social and environmental considerations are all considered and balanced in development outcomes.
	<p>We note the following concerns or additional considerations which should be contemplated as background to this policy:</p> <ul style="list-style-type: none"> <li>The discussion should include reference to the role of community consultation and the Community Engagement Charter in the development of integrated planning policy.</li> </ul>
Objective:	The draft objective states: Integrated planning is an essential approach for liveability, growth and economic development, maximising the benefits and positive long-term impacts of development and infrastructure investment.
	We propose an objective statement as follows: Integrated planning is an essential approach for liveability, growth and economic development, maximising the benefits and positive long-term impacts of development and infrastructure investment and providing certainty about outcomes for both community and proponents for new development.
Policies:	<p>We have reviewed the proposed policies in consideration of our objective position and propose the following policies for consideration:</p> <p>Policies supported as drafted:</p> <ul style="list-style-type: none"> <li>4. Manage growth in an orderly sequence to enable the cost-effective and timely delivery of investment in infrastructure commensurate with the rate of population growth into the future.</li> </ul> <p>Policies suggested for amendment:</p> <ul style="list-style-type: none"> <li>1. Plan growth in areas of the state that are connected to, integrated with, and protect, existing and proposed transport routes, infrastructure, services, employment lands and their functions unless other planning considerations identify clear compromises for increased growth.</li> <li>2. Ensure that areas of rural, landscape, environmental or food production significance within Greater Adelaide are protected from urban encroachment as provided for by the Environment and Food Production Areas legislation. Spatially identify and document these areas in policy.</li> <li>3. Provide an adequate supply of land outside the Environment and Food Production Areas that can accommodate housing and employment growth over the relevant forecast period. Based on current dynamics, the relevant forecast period is considered to be 10 years. Spatially identify and document these areas in policy.</li> <li>5. Plan for urban growth to protect and preserve opportunities for high value horticulture, tourism and landscape character areas. Spatially identify and document these areas in policy.</li> <li>7. Facilitate housing choice and mixed-use development around activity centres and strategic transport accessibility allowing and encouraging reduced car parking where greater user of public transport, walking and cycling options are viable.</li> </ul>

	<p>Additional Policies:</p> <ul style="list-style-type: none"> <li>• Generate an approach to Metropolitan Adelaide as predominantly low to medium rise with higher rise focussed in the CBD and selected areas and spatially define the anticipated urban form in policy.</li> <li>• Generate policy which considers a spectrum of future South Australians with diversity in age and capacity and provides enabling and connecting outcomes.</li> <li>• The creation of integrated planning policy should ensure community engagement and communication and the application of precinct planning to assist understanding and certainty.</li> </ul> <p>Deleted Policies:</p> <ul style="list-style-type: none"> <li>• 6. Enable the regeneration and renewal of neighbourhoods to provide diverse, high quality and affordable housing supported by infrastructure, services and facilities.</li> <li>• 8. Support metropolitan Adelaide as a predominantly low to medium rise city, with high-rise focussed in the CBD, parts of the Park Lands Frame, significant urban boulevards and other strategic locations where the interface with lower rise areas can be managed.</li> </ul>
<p>Non Statutory Guidance Notes:</p>	<p>We make the following key comments on the non statutory guidance notes:</p> <ul style="list-style-type: none"> <li>• The regional plans should include references to the need for community engagement and the undertaking of precinct planning to assist with certainty of outcomes.</li> </ul>

**State Planning Policy 2 : Design Quality**

Background:	Good design is necessary to create positive environments for people and ensuring long term sustainability. It will be crucial in managing increasing density and in maintaining community identity and character.
	<p>We note the following concerns or additional considerations which should be contemplated as background to this policy:</p> <ul style="list-style-type: none"> <li>• The background statement should clearly note that good design is not about aesthetic outcomes only and is not subjective.</li> <li>• The background statement should talk to the need to engage with community and with skilled practitioners in the delivery and assessment of good design.</li> <li>• The background statement should reference authenticity and quality of materials as key elements in the delivery of good design.</li> </ul>
Objective:	The draft objective states: The Principles of Good Design are embedded within the planning system to elevate the design quality of South Australia’s built and natural environment and public realm.
	We propose an objective statement as follows: The Principles of Good Design and the roles and processes to achieve it are embedded within the planning system and Planning and Design Code to ensure high quality outcomes for South Australia’s built and natural environments and private and public realms.
Policies:	<p>We have reviewed the proposed policies in consideration of our objective position and propose the following policies for consideration:</p> <p>Policies supported as drafted:</p> <ul style="list-style-type: none"> <li>• 6. Provide high quality, functional and accessible public green spaces and streetscapes, particularly in areas with increasing infill development, housing diversity, population growth, medium to high residential densities and urban renewal.</li> </ul> <p>Policies suggested for amendment:</p> <ul style="list-style-type: none"> <li>• 1. Ensure plans require development that incorporate the Principles of Good Design.</li> <li>• 4. Ensure that design advice is considered early in the planning process for merit assessed projects and utilises credible processes such as design review undertaken by appropriately qualified and experienced assessors.</li> <li>• 5. Promote a culture of good design to foster creative thinking, innovation and effective design processes across the planning system.</li> </ul> <p>Additional Policies:</p> <ul style="list-style-type: none"> <li>• Ensure the development of safe, welcoming, enabling and connected buildings and places which are efficient and sustainable.</li> <li>• Define clear triggers and assessment pathways to prioritise performance based design assessment of developments with larger urban and community impacts.</li> <li>• Codify clear design quality outcomes for low impact developments to deliver good design quality through efficient assessment processes.</li> <li>• Introduce and resource measures to audit and ensure the delivery of design quality outcomes post approval for developments.</li> <li>• Utilise community engagement to educate on the value and benefits of design quality.</li> <li>• Ensure that developments consider good passive design principles and high quality amenity for occupants through appropriate orientation, natural light and ventilation and solar control.</li> </ul>

	<p>Deleted Policies:</p> <ul style="list-style-type: none"> <li>• 2. Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design, Access for All, Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design.</li> <li>• 3. Ensure the development of safe, welcoming, comfortable and efficient buildings and places to reduce economic and social disparity.</li> <li>• 7. Prioritise performance based design quality outcomes in Adelaide City; heritage and character areas; places where medium-rise buildings interface with lower-rise development; mixed-use renewal precincts; transit corridors; and iconic locations that attract high levels of pedestrian activity and/or tourism.</li> </ul> <p>8. Enable quality design solutions in the planning and design code for low-medium density development.</p>
<p>Non Statutory Guidance Notes:</p>	<p>We make the following key comments on the non statutory guidance notes:</p> <ul style="list-style-type: none"> <li>• The guide note should specifically reference the role of precinct planning in the guidance and communication of design quality.</li> <li>• The guide note should recognise the roles for both community engagement and also the utilisation of suitably skilled and experienced professionals in the delivery of design quality.</li> </ul>

### State Planning Policy 3 : Adaptive Reuse

Background:	Existing infrastructure and built form has benefits of inherent embodied energy and connection to our shared history and cultures. Adapting older or underused structures can contribute to the 'story' of communities by building on existing and past context and history, for future gain.
	<p>We note the following concerns or additional considerations which should be contemplated as background to this policy:</p> <ul style="list-style-type: none"> <li>• An emphasis on adaptive re-use potentially isolates or excludes the application of 'reinvigoration' of an existing use. In some instances a continuance of, and update of existing use is as valid or more so. The policy should provide at least equal emphasis on this.</li> <li>• The Institute has previously written about the service and authority barriers to adaptive re-use of individual buildings. We suggest greater planning encouragement of precinct based solutions and attach our submission on the same.</li> </ul>
Objective:	The draft objective states: The adaptive reuse of existing buildings accommodates new and diverse uses.
	We propose an objective statement as follows: The adaptive reuse of existing buildings accommodates new and diverse uses and potential for an enhanced existing use.
Policies:	<p>We have reviewed the proposed policies in consideration of our objective position and propose the following policies for consideration:</p> <p>Policies supported as drafted:</p> <ul style="list-style-type: none"> <li>• 1. Remove barriers and encourage innovative and adaptive reuse of underutilised buildings and places to inspire urban regeneration, stimulate our economy and unlock latent investment opportunities.</li> <li>• 2. Sponsor models of adaptive re-use that allows flexible access to public spaces and infrastructure.</li> <li>• 3. Enable the repurposing and adaptive reuse of historical buildings and places that recognise and preserve our state's history.</li> <li>• 4. Prioritise the adaptive reuse of buildings within the City of Adelaide and other mixed-use precincts.</li> <li>• 5. Facilitate the conversion and adaption of existing commercial office buildings in the City of Adelaide for residential or mixed-use.</li> </ul> <p>Policies suggested for amendment:</p> <ul style="list-style-type: none"> <li>• 6. Provide a range of planning and development incentives and bonus schemes to streamline decision-making processes, provide dispensation on prescriptive requirements that constrain opportunities, and capitalise on related regulatory or financial incentives outside of the planning system to encourage investment in the upgrade and re-use of existing buildings</li> <li>• 7. Ensure performance-based building regulations are flexible to encourage the adaptability of existing buildings to new uses, or encourage continued investment to maintain and upgrade existing uses, without compromising health and safety.</li> </ul> <p>Additional policies:</p> <ul style="list-style-type: none"> <li>• The planning system should encourage wider precinct based solutions to the provision of services to enable adaptive re-use of buildings which are constrained by individual site conditions.</li> </ul>

Non Statutory  
Guidance Notes:

We make the following key comments on the non statutory guidance notes:

- The Planning and Design Code should also implement state policies that provide flexible, performance-based building policies and provide bonuses and/or incentives that encourage the reuse of existing buildings and encourages continual investment to achieve a continuance of function at a much improved level.

**State Planning Policy 6 : Housing Supply and Diversity**

Background:	Housing policy needs to reflect options for well design housing choice. Amenity and social connectivity is driven through the supply of diverse options that allow for appropriate housing for appropriate stages of life, changing demographics and social groups and culture.
	<p>We note the following concerns or additional considerations which should be contemplated as background to this policy:</p> <ul style="list-style-type: none"> <li>• The background statement places less emphasis of flexibility of planning to enable social and cultural flexibility, whilst concentrating more on choice for an ‘occupant’</li> <li>• An acknowledgement on the potential of the ‘missing middle’ of generational co-housing or shared economy should be encapsulated in the policy.</li> </ul>
Objective:	The draft objective states: A range of diverse, affordable, well-serviced and sustainable housing and land choices is provided as, where and when required.
	We propose an objective statement as follows: A range of diverse, flexible, affordable well serviced and sustainable housing options and land choices, encouraging appropriate responses to generational change and housing requirement.
Policies:	<p>We have reviewed the proposed policies in consideration of our objective position and propose the following policies for consideration:</p> <p>Policies supported as drafted:</p> <ul style="list-style-type: none"> <li>• 1 .Enable the provision of a well-designed, diverse and affordable housing supply that responds to population growth and targets, and the evolving demographics and lifestyle needs of our current and future communities.</li> <li>• 2. Ensure there is a timely supply of land for housing that is integrated with, and connected to, the range of services, facilities, public transport and infrastructure needed to support liveable and walkable neighbourhoods.</li> <li>• 3. Support regional centres and town growth and the demand for increases in housing supply within the existing town footprint or outside towns where there is demonstrated demand and it is contiguous with the existing development area.</li> <li>• 4. Promote residential and mixed-use development in centres and corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.</li> <li>• 6 .Increase the amount and diversity of residential accommodation in Adelaide City to support a variety of household types for a range of age and income groups, including students, professionals and the ageing.</li> <li>• 8. Support the creation of healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.</li> </ul> <p>Policies suggested for amendment:</p> <ul style="list-style-type: none"> <li>• 5. Provide a permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation and multigenerational options.</li> <li>• 7. Enable and encourage the provision of Affordable Housing through incentives such as planning policy bonuses or concessions (e.g. where major re-zonings are undertaken that increase development opportunities).</li> </ul>



	<p>Additional Policies:</p> <ul style="list-style-type: none"> <li>• 9. Policy needs to be holistic with generational change and related government policy to ensure impediments to moving are removed to encourage a more mobile and flexible culture to evolve where housing is viewed as being appropriate for current stages of life.</li> <li>• 10. Design standards for the majority of housing to be more structured to ensure issues of orientation, insulation and neighbourhood are embedded at a base level.</li> <li>• Housing supply to provide natural amenity for occupants such as natural lighting, ventilation and outlook with solar control.</li> <li>• Housing supply to encourage interaction and community building through interaction with the public realm for individual developments as well as private community use spaces for larger developments.</li> </ul>
<p>Non Statutory Guidance Notes:</p>	<p>We make the following key comments on the non statutory guidance notes:</p> <ul style="list-style-type: none"> <li>• For the planning and design code to support affordable housing, it needs to be referred and be supported by other policy relating to existing financial disincentives to move e.g stamp duty</li> </ul>

## State Planning Policy 7 : Cultural Heritage

Background:	<p>Cultural heritage spans the entire history of Australian settlement from 65,000 years ago to the present.</p> <p>Recognition and promotion of areas of cultural significance can add a rich layer to the tapestry of a 'sense of place' and a region's built form and heritage.</p>
	<p>We note the following concerns or additional considerations which should be contemplated as background to this policy:</p> <ul style="list-style-type: none"><li>• The policy should acknowledge that the cultural history of Adelaide is both multicultural and a melting pot of cultures.</li><li>• Policy could be further articulated to acknowledge that melding of cultures and continuance of traditions can equally enliven communities and development and are not mutually exclusive</li></ul>
Objective:	<p>The draft objective states: Places of cultural heritage significance and heritage areas are conserved for the benefit of our present and future generations.</p>
	<p>We propose an objective statement as follows: Places and spaces of cultural heritage significance and heritage areas are both conserved and interpreted for the benefit of our present and future generations.</p>
Policies:	<p>We have reviewed the proposed policies in consideration of our objective position and propose the following policies for consideration:</p> <p>Policies supported as drafted:</p> <ul style="list-style-type: none"><li>• 1. Support and promote the sensitive and respectful use of our culturally and historically significant places.</li><li>• 2. Recognise and protect Indigenous cultural heritage sites and areas of significance.</li></ul> <p>Additional Policies:</p> <ul style="list-style-type: none"><li>• 3. Recognise that culture evolves and can meld and that opportunities that benefit the story of South Australia's ongoing cultural development can be integrated into our cultural heritage.</li></ul>

**State Planning Policy 11 : Strategic Transport Infrastructure**

<p>Background:</p>	<p>The State’s economy relies on a safe, integrated, co-ordinated, dependable and sustainable transport system. Our roads, rail lines, bus systems, cycling and walking networks, airports and ports, are important assets that need to be integrated with land development to address existing and future connectivity needs.</p>
	<p>We note the following concerns or additional considerations which should be contemplated as background to this policy:</p> <ul style="list-style-type: none"> <li>• The discussion paper addresses the need for development around key infrastructure to respond to that infrastructure (eg mixed use development around nodes) but it does not address transport infrastructure’s role in catalysing development and the importance therefore of it being designed with that in mind. For example, much of our public transport infrastructure does not maximise its potential to catalyse strong urban centres – it is focussed on good transport system outcomes. The background should include commentary on the role of transport infrastructure in catalysing urban development and employment opportunities and the importance of applying good urban design and development principles to the design of transport infrastructure.</li> <li>• Similarly, the paper does not address the impact that transport infrastructure can have on the quality of the urban environment. Current experience is that engineering outcomes take priority over urban outcomes. There should be a discussion on the need for careful balancing of transport and urban priorities – both can be achieved</li> <li>• The title of the policy should not be limited to <b>strategic</b> transport infrastructure, particularly when it comes to urban transport systems</li> <li>• The impact of new technologies, especially autonomous vehicles, will significantly change the urban form of towns and cities. There is no discussion on this, which is a significant omission. New transport modes fundamentally change cities so this needs to be addressed now before we end up with unintended outcomes</li> </ul>
<p>Objective:</p>	<p>Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and business.</p>
	<p>We propose an objective statement as follows:</p> <p>Land development policies are integrated with existing and future transport infrastructure, services and functions to preserve and enhance the safe, efficient and reliable connectivity for people and business. Urban public transport infrastructure is designed to enhance the quality of the urban environment in which it is located and be developed with human scale and community building as a focus. The impact of future transport technology is specifically addressed in all land development policies.</p>
<p>Policies:</p>	<p>We have reviewed the proposed policies in consideration of our objective position and propose the following policies for consideration:</p> <p>Policies supported as drafted:</p> <ul style="list-style-type: none"> <li>• Enable an efficient, reliable and safe transport network connecting business to markets and people to places (i.e. where they live, work, visit and recreate).</li> <li>• Promote development that maximises the use of existing and planned investment in transport infrastructure and services.</li> <li>• Enable equitable contribution towards the provision of transport infrastructure and services to support land and property development</li> <li>• Support the long-term sustainability and management of transport assets and the various modes that use these assets</li> <li>• Minimise negative transport-related impacts on communities and the environment</li> <li>• Enable and encourage the increased use of a wider variety of transport modes including public transport, walking and cycling to facilitate a reduced reliance on private vehicle travel</li> </ul>

	<ul style="list-style-type: none"> <li>• Allow for the future expansion and intensification of strategic transport infrastructure and service provision (corridors and nodes) for passenger and freight movements</li> <li>• Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight)</li> <li>• Enable development that is integrated with and capitalises on existing and future transport functions of transport corridors and nodes</li> <li>• Plan development to take advantage of emerging technologies, including electric and alternative fuel vehicles, autonomous vehicles and on-demand transport opportunities</li> </ul> <p>Additional Policies:</p> <ul style="list-style-type: none"> <li>• Plan and design all new urban public transport infrastructure access nodes to facilitate the long term growth of mixed use urban centres in their vicinity and prioritise the ease of movement for pedestrians and cyclists around them</li> <li>• Undertake Design Review on all new major public transport infrastructure nodes with a focus on the quality of urban design outcomes and human scale.</li> </ul>
Non Statutory Guidance Notes:	<p>We make the following key comments on the non statutory guidance notes:</p> <ul style="list-style-type: none"> <li>• The Planning and Design Code should include guidance on the design of transport nodes and the places where people interact with the transport system</li> </ul>