



22 February 2019

Response to the Planning and Design Code: Productive Economy Policy Discussion Paper

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

AILA SA thanks the 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.

AILA SA has most recently provided feedback on the Natural Resources and Environment Policy Discussion Paper and the Integrated Movement Systems Policy Discussion Paper. [Click here](#) to review AILA SA's ongoing advocacy to support the Planning Reform in SA.

We commend the Department on the recent release of the ***Planning and Design Code: Productive Economy Policy Discussion Paper*** and acknowledge the significant amount of work undertaken in preparing this series of discussion papers.

We highlight that well-designed neighbourhoods and affordable living are critical elements associated with enhancing South Australia's economic competitiveness as we move into our new planning system. The *Discussion Paper Summary* touches on the importance of liveability to attract workers to our State which is vital to the economic sustainability of South Australia. AILA SA strongly advocates for improving the liveability of our State, and the role the PDI Act will play in shaping its appeal.

General Comments

As noted on Page 1 of *Productive Economy Policy Discussion Paper Summary*, the planning system has a significant role to play, "protecting and growing key industries, linking people to jobs, goods and services, providing infrastructure to enhance liveability, and facilitating greater opportunities for innovation". These are all fundamental elements in shaping neighbourhoods and liveability in our State that AILA SA supports.

The Paper highlights the importance of the knowledge and creative industries in our State, including specialised design services within which the profession of Landscape Architecture sits. AILA SA is proud to be part of a tight knit collegiate design industry which is well regarded nationally and internationally as evidenced by professional institute, building and urban development industry awards.

AILA SA supports the focus of the discussion paper towards enabling greater economic growth, however, must stress that this growth must be channeled through a strategic and informed planning

system that is able to effectively articulate and distinguish the long-term future for the community, including neighbourhood function, built form and local environmental.

AILA SA has previously commented on the lack of mapping contained within the 30-Year Plan for Greater Adelaide. The lack of spatial clarity in this strategic document poses a challenge to understand the local application of the themes identified within the discussion paper, such as innovation precincts, activity centres, etc.

The economics of our neighbourhoods must inform and be informed by the other topics detailed in the existing and future proposed discussion papers. Each of the 5 topics are inter-related and the opportunity to provide comment into individual papers provides only a partial understanding of the complexity of the planning and design of our built environment.

Productive Economy Policy Discussion Paper – AILA SA Discussion Response

Theme 1 - Supporting and Growing Key Industries

Sub Theme – 1.1 Primary Industries

No comment – not spatially relevant

Sub theme 1.2 – Tourism

Discussion Question:

- *Do we need to review our signage policies? In particular, do we need facilities for third party advertising and tourism advertising? For example, more scope for tourism signs on arterial roads and outside of townships?*

AILA SA is a strong advocate for the quality of our natural and adapted landscapes (such as wine regionals).

Part of the attraction for tourist is the quality of these distinctive landscapes, as well as urban settings and individual buildings.

AILA SA would not support the expansion of third party advertising or tourism advertising.

Sub theme 1.3– Mining and exploration

No comment – not spatially relevant

Theme 2: Linking people to jobs, goods and services

Sub theme 2.1 –Centres, retail and mixed use activities

Discussion Questions:

- *Is there a need to retain the centres hierarchy or not – is it still relevant to today's planning?*
- *Should there be residential development within retail centres? If so, how could it be encouraged?*

AILA SA supports the identification and reinforcement of centres, as well as distinction through an established hierarchy,

AILA SA remains in support of residential development within retail centres, recognising its social and economic benefits to the centres. The Planning System should encourage greater innovation in built form to allow complementary uses above or behind commercial activities, as well as make provisions for public realm and other services that support a desirable way of life.

Sub theme 2.2 –Employment lands (industry, manufacturing and commercial)

Discussion Questions:

- *Should there be a more flexible approach to encouraging a wide range of land uses in non-residential zones – with a land-use genus, impact and design focus, rather than strict land use definitions?*

AILA SA encourages DPTI to consider in the planning or zoning of employment lands the infrastructure needs of the areas to ensure their competitive appeal, performance and long-term sustainability.

These considerations should include supporting social and cultural facilities, public transport, and resilient urban environments.
- *Is there too much emphasis placed on height and setback criteria as it relates to employment lands zones, in particular the ‘core’ of these zones?*

Sub theme 2.3 – Home-based businesses

Discussion Question:

- *What innovations and changes to work practices will impact the planning system and how should we respond?*

AILA SA supports the reframing of home-based businesses as an important element of active and diverse neighbourhoods.

Consideration should be given to support the growth of local businesses, balancing the different needs of residents / businesses as well as the ease to transfer into economic / activity centres.

Theme 3: Providing infrastructure to enhance our liveability

Sub theme 3.1 – Renewable energy

Discussion Question:

- *How should planning policy respond to growth in renewable energy – what issues should be addressed?*

AILA SA supports the expansion of renewable energy and advocates for greater planning framework to enable growth, in small and large scale where appropriate.

The importance of landscape planning, visual impact assessment and other design services should provide better tools to inform the integration of infrastructure into urban and regional landscapes.

Sub theme 3.2 – Adaptive reuse

Discussion Question:

- *Should existing unused farm houses be able to be separately titled to allow their adaptive reuse and to facilitate economic activity?*

AILA SA supports greater opportunity for authentic adaptive reuse of existing and historic buildings, across all areas of South Australia, not limited to farm houses.

Sub theme 3.3 – Infrastructure

Discussion Question:

- *How can we ensure that land-use planning is able to accommodate and support the provision of new and innovative infrastructure?*

AILA SA strongly supports a strategic, integrated approach between land use planning, infrastructure and finance to ensure the provision of infrastructure is realised in parallel with development.

AILA SA strongly encourages DPTI to further expand on recognition and support for infrastructure that improves liveability, including greater support for green infrastructure.

Theme 4: Facilitating innovation and enabling investment

Sub theme 4.1 – Collaboration and clustering

Discussion Questions:

- *Do we have adequate planning policies in place to encourage/support the aims of innovation districts?*
- *How do we ensure that residential development does not monopolise the offering in mixed-use areas of innovation districts?*

AILA SA supports the Innovation Precinct Criteria, however, encourages DPTI not to limit the 9 key criteria to only these specialist precincts, and ensure they are embedded in policy across all areas of productive communities.

Sub theme 4.3 – E-Commerce and a sharing economy

Discussion Questions:

- *Does planning policy need to respond better to new ways of doing business, such as the emergence of the sharing economy – which may require the introduction of controls to mitigate previously unanticipated effects (for example, the effective conversion of long term rentals into holiday accommodation via online platforms)?*
- *What will be the emerging industry impacts of e-Commerce and how should these be managed by the Code?*

AILA SA considers the changing role of our neighbourhoods in fostering business is an important consideration, and allowances should be made for the ability to adapt development to meet market demands.

The reference example does not change the planned purpose of the development, but the means to manage it.

E-Commerce could be readily integrated into desirable neighbourhood with strong community appeal, underpinning the revival or sustainable of local centres / main streets etc

In conclusion, AILA SA would like to see more detailed information and participate in further discussions on these specific issues related to the liveability and the economic value of well-designed neighbourhoods in the People and Neighbourhoods Discussion Paper. AILA SA plans to comment in more detail when this is released.

AILA SA strongly support the aspirations of Innovation Precinct Criteria and encourages DPTI to use the 9 criteria to better unlock potential and drive innovative design outcomes for people and places in our state.

We thank you for the opportunity to provide feedback and commend DPTI on this important work.

Please contact me if you have any questions or contact Sally Bolton – AILA SA State Manager by email - 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, sweeping horizontal line extending to the right.

Ben Willsmore
AILA SA State President