



Australian Institute of
Landscape Architects

AILA SA Response to the Introduction to Technical Discussion Paper - Future land use definitions and classes

20 April 2018

The Australian Institute of Landscape Architects – South Australian Chapter (AILA SA) is pleased to provide a response to the *Introduction to Technical Discussion Paper - Future land use definitions and classes*. AILA SA continues to engage collaboratively with the State Government and its agencies to build stronger communities and promote a more prosperous and sustainable future for South Australia.

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 and Stage 1 and Stage 2 Draft of the Community Engagement Charter and most recently the Accredited Professionals Scheme - Discussion paper.

Overview

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 thanks DPTI for the opportunity to provide feedback on potential gaps, areas of conflict or opportunities for improvement within the current suite of land use definitions and classes in South Australia. Our responses are framed upon the review of the South Australian Planning Policy Library (SAPPL) terminology list, and on the definitions included in Schedule 1 of the Development Regulations. We provide the following feedback in relation to the consultation questions provided:

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1. What land use definitions are working well?

We note and support the inclusion of definitions for green roof (and roof top garden), green wall, greenway and recreation in the SAPPL Terminology List and that these terms have now become accepted and used in the planning system as a means of encouraging the inclusion of green infrastructure in new developments in our State.

2. What improvements could be made to better reflect today's policy and development trends?

The terms "Open Space" and "Park" and "Playing Field" as per the SAPPL terminology are not accepted terms, and generally are not classed as development - this is a big gap that needs addressing if we are to meet the targets of 30 Year Plan for Greater Adelaide and increase the quality and quantity of our open space in the State.

The SAPPL and Schedule 1 of the Development Regulations nominate "Recreation Area" as a catch all for public open space. For the general public, the term "Recreation Area" may provoke a focus on activity and sports, as opposed to "open space and parks" as a broader phrase to enable a diversity of open space types that support the social, physical and environmental health and wellbeing of our communities.

In addition, as urban infill becomes a more dominant development trend, the importance of the value of quality 'public realm', including urban spaces such as streetscapes, plazas, forecourts, main streets, and boulevards should be better defined.

AILA acknowledges the consideration given to the relationship between built form (development) and different recreation types in the SAPPL. However, AILA SA considers the simplification of 'recreation area' and absence of 'public realm' understates the breadth of values attributed to public urban settings, open spaces and parks including health, environmental, social and economic outcomes for our communities.

AILA SA is concerned that the definition of 'open space ratio' in Schedule 1 of the Development Regulations is seemingly disconnected with the broader community understanding (and AILA SA's proposed re-definitions of open space) as its application relates specifically to private open space.

AILA believes the diversity of open space needs to be considered as a whole, and how public and private open space can be used together to assist in delivering better open space outcomes for people as our city becomes denser as supported by the infill targets listed in the 30 Year Plan for Greater Adelaide. It is noted that "private open space" or "public open space" are not terms found in Schedule 1 of the Development Regulations, although they are referenced in the SAPPL.

Access to quality public open spaces needs more consideration in the development application processes at a large multi stage developments as well as the increasingly dominant infill developments (particularly residential 1 lot into 2 or 3 or 4). The development process should require demonstration that access to quality local open spaces (including urban settings) is considered early on in master planning / subdivision processes as well as enable mechanism for developments to contribute funding towards local open space provision/enhancement to accommodate for increased use and demand. Suitable "open space" definitions will assist in this process.

As development trends change to suit the desire for increased density along urban corridors and suburban infill, the provision of quality private opens spaces through the development application process will be becoming increasingly important. These spaces differ between medium / high rise development and new infill development (particularly residential 1 lot into 2 or 3 or 4). These spaces will be increasingly important to ensure a quality of life for residents, as well as ensuring development continues to strive to meet targets listed in the 30 Year Plan for Greater Adelaide, including tree canopy cover. Land definitions should also consider the implications of creating new ‘Privately Owned, Publically Accessible Open Spaces’ through the development process.

We believe definitions are needed for each of these terms considering the above discussion.

AILA SA continues to support appropriate regulations to support the retention and of our urban forest (Significant and Regulated trees) and the protection of our natural environment and environmental systems through the development application process.

3. What gaps or areas of conflict are there within our current definitions?

Increased health and wellbeing outcomes need to be referenced in the legal notes supporting the need for quality public and private opens spaces, and the importance of green infrastructure in the SAPPL. Numerous studies now reinforce that access to quality open spaces have positive effects on people’s mental and physical health, as well as the economic imperative to better plan, design and manage our urban areas against a changing climate.

A definition of Green infrastructure is required as an umbrella term for all contributory green spaces, open space, natural systems and waterways. As referenced in the State Government’s 30 Year Plan for Greater Adelaide, AILA SA defines Green Infrastructure as:

“the network of natural landscape assets, which underpin and provide for the economic, socio-cultural and environmental functionality of our cities and towns.” Green Infrastructure, when planned well and integrated into the public realm can contribute to improving the comfort, quality and health of the city and its residents.”

Green Infrastructure initiatives can include green roofs and walls, street trees and tree planting, greener open-space design and rain gardens, and can protect the community against the potentially life-threatening effects of flooding, excessive heat (urban heat island impact) and other climatic variables. It supports biodiversity and provides the critical connections within and between ecosystems. It is also considered a more efficient and effective means of managing stormwater, when compared with traditional grey infrastructure solutions.

Stormwater Detention / Retention Basin and Recreation Areas are separately defined in the SAPPL. AILA SA has identified opportunity to link these two definitions utilising water sensitive urban design as a tool to enable basins to function as useable open spaces (recreation areas) as well as perform a stormwater function when required. As our cities and suburbs become more dense and open permeable space is reduced through infill development the importance of open space to provide more than one function will be necessary. This is already a requirement in other states such as NSW with Blacktown City Council delivering multipurpose recreation reserves that perform stormwater functions too.

In addition, we believe that water sensitive urban design should have its own definition in the SAPPL.

4. What land uses and development types might better function if grouped together?

Urban renewal is not defined in the SAPPL but is already impacting our city and suburbs. It will continue to be more prolific as we seek to reduce growth at the edges. AILA SA recommends that specific attention is paid to urban renewal projects and the impacts such projects have on the physical (pits, pipes, open space, existing built form, electricity capacity) and non-physical (social, psychological and cultural) infrastructure of our streets, neighbourhoods and suburbs in the future. Provision of open space is central to this for the reasons described above.

5. How can we present the concept of land use classes in the Code and reduce the number of change of use applications?

AILA SA would support the advancement of performance-based outcomes rather than prescriptive ones, subject to an improved assessment process, including the use of diversified expert panel assessment.

AILA SA has several policies and position statements that provide additional detail on some of the ideas and topics detailed above and we provide this below as additional information.

- Australian Institute of Landscape Architects (AILA SA) Quality Green Public Space – AILA SA Discussion Paper to inform the Healthy Parks Healthy People Action Plan 2 - [Click Here](#)
- [AILA Green roofs and Green Walls Policy](#)
- [Healthy Communities - Healthy Living Landscape solutions_v1_published 11/16](#)
- [Living Cities Workshop Report](#)

As a national body, AILA is continuing to develop policies and position statements on contemporary issues facing Australian cities, towns and suburbs. We would be pleased to share this information further with the Department as it continues to develop content.

AILA SA's ongoing work with the Department of Planning, Transport and Infrastructure (DPTI) is critical to elevate the value of Green Infrastructure as a key mechanism for building stronger healthier communities in SA. Green Infrastructure principles are fundamental to inform the development of policy, guidelines and technical content as part of the new Planning System and we thank you for the opportunity to provide feedback on the Future land use definitions and classes to further highlight this important issue.

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,



Ben Willsmore
AILA SA State President