



Australian Institute of
Landscape Architects

28 February 2020

Response to the Draft Planning and Design Code Consultation Phase 3 (Urban Areas) by the Australian Institute of Landscape Architects, South Australian Chapter

Preface

AILA SA extends its appreciation to the State Government for the ongoing opportunity to provide feedback and expertise to inform the Planning Reform in South Australia.

The Australian Institute of Landscape Architects represents the growing national advocacy body representing nearly 4,000 active and engaged landscape architects across Australia, including over 300 in South Australia.

Our members 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.

Our members work across private practice, government, and academia from policy and strategy through design and documentation, to delivery, maintenance and operations.

AILA SA has provided feedback on several Discussion Papers over the reform period.

[Click here](#) to review AILA SA's ongoing advocacy to support the Planning Reform in SA, and this forms part of our final submission.

We will continue to advocate 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.

Introduction

The Planning and Design Code (the Code) represents the most significant review of the planning system in over thirty years.

The timing of this review comes at a critical point in our understanding of how our cities, neighbourhoods and communities must be planned and designed to meet the competing needs of society and the environment within the context of a changing climate.

There is a growing need to provide pragmatic support through the Code that establishes resilient, long-lasting and cultural change for South Australia.

Australian Institute of Landscape Architects
South Australian Chapter

Address GPO Box 1584, Adelaide, SA, 5001
Email sa@aila.org.au
ACN No. 008 531 851 | ABN 84 008 531 851

AILA SA's Response

Our submission includes the following areas and recommendations:

1. Design
2. Concept Plans
3. Trees
4. Achieving Good Design
5. Gardens
6. Car Parking
7. Offsets
8. Conflicts of Codes
9. Performance Outcomes
10. Planning and Development Fund and Open Space Contributions
11. Community Consultation
12. Other issues

Given the importance of the Code, AILA SA welcomes the announcement recently that the State Government will delay going live with the new system or go live and test and then change it once operational.

We support more time for a deeper and more meaningful discussion to ensure the very best outcomes for the Code as well as enabling an analysis of the new system in a trial environment.

1. Design

AILA SA has concerns that 'design' (by definition) is not clearly referenced in the Code, yet it is called the 'Planning and Design Code'. There are many references to elements of planning; however, we have concerns that design quality is not articulated.

The State Planning Policy 2: Design Quality, states the objective is *"to elevate the design quality of South Australia's built environment and public realm"*.

Focused and clear advocacy is also important to reference best practice and guidance on the incorporation of good design principles for not only developers, but also the wider community.

There are many best practice examples that would assist a better appreciation of design, as well as assisting the operation of the Code. The ability of the development sector and the wider public to be inspired by these documents could be referenced in the Code.

In addition, to further advocate for good design and assist with a broader understanding of how it can be achieved, the establishment of design guidelines will demonstrate the application of good design principles, using precedent images and diagrams.

For example, 'External Appearance PO 9.1 Buildings positively contribute to the character of the local area by responding to the local context.'

Guidance material could provide examples of what this means and some design techniques as to how to achieve it. When it comes to this being performance assessed, there should be a higher likelihood that there will be a favourable response.

Recommendations

Recommendation 1.1 – The Code must embed design in the Code

Design must be embedded and recommend the Principles of Good Design (Figure 3 – SPPP 2 – Context, Inclusive, Durable, Value, Performance, Sustainable) are also referenced and continually used as the overarching framework for testing and refining within the Code.

We note that in the Design in Urban Areas Development Policy the desired outcomes refer to four of the Principles of Good Design. It is important to reference all six Principles as they appear in the State Planning policies, which states they must be reflected through the Code.

Recommendation 1.2 – The Code must include an Advocacy Campaign

We recommend a focused advocacy campaign by the State Government to ensure the general community appreciate and understand the benefits of design. The campaign needs to be easy to understand with the benefits outlined clearly in the Code.

This will foster greater awareness across the development sector and create improved development outcomes.

Recommendation 1.3 – The Code must include Design Guidelines

The establishment of guidelines to support the release of the Code and to demonstrate various techniques to achieve performance outcomes, and well-designed ‘deemed to satisfy’ solutions.

2. Concept Plans

AILA SA has concerns that the concept plans in the current Development Plans have been removed from the Code.

The existing concept plans have been useful across a range of strategies, projects and community engagements for many years by landscape architects.

The plans express the local Development Plan’s key and desired features – from precincts, to movement and street networks, open space and parks, and orientation. The concept plans provide a contextual framework in which to explore future development.

They have been used by both private and public Landscape Architects (and many other professions) to assess how we assist in defining proposed developments and projects.

Without clear reference to the Principles of Good Design (or other definitive measures), and the omission of concept plans, how will good design be achieved and measured? Removing site permeability, articulation and removal of long blank walls from streetscapes is hard to measure as ‘good design’ if there are no clear guidelines in place.

Further, and as noted in SPP2, the “Code must also include performance outcomes and design solutions that are based on the Principles of Good Design for all development types”.

The removal of concept plans is a retrograde step in our view, and we recommend this is reviewed.

Recommendations

Recommendation 2.1 – The Code must include new Concept Plans

We recommend a mechanism is developed to include new Concept Plans in the Code, with performance-based outcomes and measures to assess new developments.

Recommendation 2.2 - The Code must include Performance-based outcomes

We recommend the Code must include performance-based outcomes; it is critical to ensure experts with the requisite skills review the proposed performance outcomes through the accredited professional scheme.

3. Trees

3.1 Tree canopy targets – private development

AILA SA strongly advocates for the value of trees in our communities for health, social economic and environmental reasons.

The benefits of trees in our urban environment are well known and documented.

The Code must ensure that adequate space is given to trees to ensure that the inherent benefits for our communities are achieved.

The 30-Year Plan for Greater Adelaide sets a target that urban canopy cover is increased by 20% in metropolitan Adelaide by 2045. This is a target we strongly support.

We draw your attention to the value of trees and refer you to the section “The Value of Trees” on Page 16 of [Creating Greener Places for Healthy and Sustainable Communities: Ideas for Quality Green Public Space in South Australia \(PDF 7MB\)](#).

However, as development intensity continues to place pressure on existing suburbs, private development on private land must accommodate space above and below the ground to ensure a range of tree sizes can be planted, grow, thrive and mature to achieve the State’s target.

The Code must also provide guidance on suitable trees, appropriate root zones, sizes of new trees (height and girth) as well as establishment periods and regimes.

Recommendations

Recommendation 3.1.1 The Code must include trees in private development

We recommend the Code must include space for trees even if the development chooses not to plant them now.

Future generations need to be provided with flexible spaces and opportunities to provide for vegetation (trees, shrubs and other plants) their private spaces and thus add to the overall canopy cover targets.

Recommendation 3.1.2 The Code must include guidance for tree and plant selection

We recommend the Code includes references to plant selection guidelines to ensure appropriate plant species selection.

3.2 Performance Outcome Landscaping (Deep Soil Zones)

Deep soil zones are required to retain existing vegetation on an existing or redeveloped site as well as areas to accommodate new deep root vegetation.

Deep soil zones allow for a range of tree species to provide shade, improve evapotranspiration, cooling, increase private canopy cover and soften the appearance of buildings.

AILA SA’s concerns are that the design of spaces to allow deep soil zones needs to be considered on a site-by-site basis.

For example, a deep soil zone that is too narrow and along the boundary will not accommodate any trees, so that the quantitative measures might be achieved; however, the qualitative benefits of the tree canopy are never achieved. Therefore, the design of sites is critical.

Therefore, we advocate that deep soil zones need to be considered contextually on a site-specific basis, and to educate on the importance of suitable and adequate planting areas as a fit-for-purpose exercise.

There is also an opportunity for innovation in slab design, house position and orientation, the inclusion of wrap-around courtyards and root trenches that improve the deep root zone of trees. Baseline provisions will not achieve the targets that the 30-Year Plan for Greater Adelaide sets out.

The Code must encourage tree planting in new developments that will provide a legacy, that are fit for purpose, and address species diversity to ensure the best environmental outcomes.

AILA SA are also concerned the Code needs to reinforce, reference and mandate the important role that front yards have in connecting green space with streetscapes.

AILA SA believes that more than 7% of a site's area is required for deep soil zones for medium to high rise development and should be included to lead change and support State's targets.

Recommendations

Recommendation 3.2.1 – The Code must include Performance Based Landscape Guidelines

We recommend the following as part of the Code:

- *Guidelines be developed to include details of minimum tree size and quality at time of installation*
- *All landscaping is established prior to occupancy*
- *The Botanic Gardens of SA Plant selector and local Council lists used to develop suitable plant species by zone, postcode, or a similar guide*
- *Greater focus on larger tree species rather than defaulting to small trees*

Recommendation 3.2.2 – The Code must mandate 7% site area for deep soil zone for medium to high density sites

We recommend more than 7% of a site's area for deep soil zones for medium to high rise development.

3.3 Existing Trees

AILA SA reinforces and strongly advocates the benefit of including incentives for retaining existing trees on sites as part of the design process for new development proposals.

A mechanism should be included within the Code for developments to include existing significant and regulated trees (as well as other trees that have local landscape character) to demonstrate the integration and the design around existing trees.

We also believe advocacy on the value of trees in contributing to green corridors, connected canopies, cooling benefits and cost benefits within the private homes will change community expectations in achieving the State's canopy targets.

To assist in developing easy to access and understand information, high quality and accurate mapping of tree canopies, like flood mapping, needs to be made accessible to all.

Similarly, mapping of all significant and regulated trees should be considered as a critical overlay in the Code, noting that trees mature and change over time.

Recommendations

Recommendation 3.3.1 The Code must include a mechanism to integrate existing Significant and Regulated Trees

We recommend integration of existing Significant and Regulated Trees on development sites, which includes accurate information available including flood mapping.

3.4 Significant and Regulated Trees Legislation

Australian Institute of Landscape Architects
South Australian Chapter

Address GPO Box 1584, Adelaide, SA, 5001
Email sa@aila.org.au
ACN No. 008 531 851 | ABN 84 008 531 851

AILA SA is concerned that the existing Significant and Regulated Tree Act is not referenced in the Code, nor is there advice on potential conflicts within the Code and other legislation.

This must be addressed as the legislation and regulations will cause more confusion as well as the potential to see more existing trees removed as a result of the Code.

Recommendations

Recommendation 3.4.1 – The Code must integrate and reference the Significant and Regulated Tree legislation

We recommend the Code includes a review of the Significant and Regulated Trees legislation to ensure the ongoing protection of Significant and Important trees in relation to the new pressures that may be applied through the ‘deemed to satisfy’ and ‘performance assessed’ pathways.

3.5 Regulated Tree Overlay (P2173)

The Code contains a single Regulated Tree Overlay. This is in contrast with the current Development Plan which distinguishes between and provides separate policy for both regulated and significant trees.

It is not clear whether significant trees under the current definition will have the same level of protection under the Code.

There is concern that regulated tree policy appears to have been consolidated within a single Regulated Tree Overlay with no higher order of policy relating to the proposed removal of a regulated tree that is a significant tree. It is unclear as to whether the omission of a separate Significant Tree Overlay is a deliberate policy decision or an inadvertent omission.

In any event, the proposed criteria for a tree damaging activity that is not to be undertaken with other development does not reference the current test that “all other reasonable remedial treatments and measures must first have been determined to be ineffective”.

The omission of this requirement, at least in respect of significant trees, would result in a severe weakening of the current level of protection.

AILA SA believes this must be rectified to ensure that the P+D Code affords the same level of protection to such trees as presently exists under the Development Plan.

AILA SA does not support any weakening of the existing Significant and Regulated tree legislation and believe that, if anything, legislation should be reviewed and strengthened to recognise and support the importance of our mature tree stock. The removal of significant or regulated trees should be a ‘last resort’ option and developers should be required to demonstrate why.

Recommendations

Recommendation 3.5 – The Code must protect all existing Regulated and Significant Trees

AILA SA recommends that all Regulated and Significant trees must be protected under the Code with the same level of protection as exists under current legislation.

4. Achieving Good Design – lack of quantifiable measurables

AILA SA is concerned that the Code’s minimum site coverage provisions will not achieve the State Government’s tree canopy targets, nor the greater benefits associated with greening, landscapes and vegetation.

The use of soft landscape or permeable surfaces remains ambiguous and open to interpretation within the Code. Mulched beds, gravel gardens and unirrigated garden beds can be soft or permeable landscape treatment without any benefit in terms of mitigating urban heat island effects, amenity or the provision of biodiversity.

AILA SA is concerned that in some instances there is a lack of ‘deemed to satisfy’ solutions with clear metrics, further there is insufficient guidance as to how to meet the criteria as a performance outcome.

The ‘deemed to satisfy’ assessment should provide incentives for good design. The performance criteria and guidelines should set new standards. Developers offering great private open space, green walls and roofs, large tree planting, WSUD, improved footing design, compact and adaptive houses with low-carbon outcomes should give an easy assessment pathway that rewards good design.

Setting values for greening rather than reductive site coverage targets leads to innovation, including green walls and roofs. A suitable example are the landscape initiatives such as LUSH in Singapore (<https://www.ura.gov.sg/Corporate/Guidelines/Development-Control/Non-Residential/SR/Greenery/>) which has become a key driver for the greening of the city. Ambitious tree canopy cover and minimum Green Plot Ratios of 40% have transformed the city for the benefit of everyone.

Practice guidelines and directions are critical for the implementation of the Code.

The ‘deemed to satisfy’ provisions must be backed up with a range of tighter, more ambitious outcomes and/or typologies to show proponents how these can be achieved.

The proposed base-line approach to the ‘deemed to satisfy’ pathway fails to realise the potential for the Code to delivering meaningful change for our urban environments.

We recommend reviewing the language associated with some Performance Outcomes that do not have a Deemed to Satisfy requirement.

Opportunities for subjective interpretation should be removed. If there is a known minimum outcome to be achieved, then a prescriptive means of achieving it should be provided. For example, as a Performance Outcome, vague language such as ‘attractively developed and landscaped, screen fenced, and the like’ should be avoided.

Whilst we appreciate that the intent is for outcomes such as this to be performance assessed, this becomes a very subjective assessment based on an interpretation of attractive.

Recommendations

Recommendation 4.1 - The Code must define vegetated surfaces

We recommend the Code clearly defines the need for vegetated surfaces and set requirement as to how vegetated surfaces should perform in relation to evapotranspiration, stormwater infiltration and the delivery of wildlife habitats.

Recommendation 4.2 – The Code must include Performance Outcomes that do not have a Deemed to Satisfy requirement

We recommend the Code reviews the language associated with some performance outcomes that do not have a deemed to satisfy requirement with subjective interpretations removed.

5. Gardens

AILA SA recommends that the State Government considers a range of advocacy measures including guidance for smaller gardens on the different approaches to gardens. This can be completed in several ways, including plant lists, 'pattern books', matching housing styles to garden styles, 'xeriscape' style gardens (no watering gardens), and case studies.

Case studies can also include different garden types – small, narrow, wide, flat, terraced, vertical, rooftop etc and includes productive gardens (vegetable and fruit gardens).

Finally, demonstrating the importance of local biodiversity and habitat in our gardens has major health and wellbeing benefits.

A link between these broader benefits to performance-based outcomes would be recommended.

Recommendations

Recommendation 5.1 – The Code considers the development of best practice garden design case studies

We recommend the Code includes references to pattern books, case studies and demonstrating the importance of creating gardens to improve housing performance, biodiversity, cooling and aesthetics.

6. Carparking DTS/DPF 6.4

AILA SA recommends changes to vehicle parking areas that are open to the sky and comprise 10 or more car parking spaces include a shade tree with a mature canopy of 4 m diameter – these should be spaced for every **five to eight** (not 10 as per the Code) car parking spaces provided and a landscaped strip on any road frontage of a minimum dimension of 1 m.

A typical car park is 2.4 m wide, and if a tree with a mature canopy of 4 m diameter is planted at the centre of four parking bays, shading of all vehicles will be optimised. However, if the trees are to reach their canopy potential, they will need uncompacted soils and water.

Car parks offer significant opportunity for tree planting as well as providing shade benefits to the public. Car parks often provide the necessary room for mature tree growth and the potential for larger tree species. As discussed previously, incentives should be explored to encourage greater tree planting and landscaping of car parks, including reduced contributions to the Planning and Development Fund or LGA car parking funds and reductions in the required parking numbers to provide more space for landscapes.

Recommendations

Recommendation 6.1 – The Code includes car parking guidelines

AILA SA recommends the Code includes the establishment of car parking guidelines for applicants to demonstrate how various techniques can be achieved, including but not limited to:

- *Ensure soil is uncompacted for proposed or future tree planting*
- *How to establish a deep soil zone*
- *Methods to passively irrigate trees and other vegetation, particularly when in conjunction with carparks, driveways and other hard paved surfaces (Note: Water Sensitive SA and CRCWSC have resources that can assist the CRCWSC national Guidelines for passively irrigated landscapes (draft) due for release in early 2020)*

7. Offsets

AILA SA strongly advocates the P+D Code should not refer to offsets and must incorporate good design by dealing with specific sites.

With greater pressure on inner metropolitan Adelaide, infill sites and ageing infrastructure (e.g. burst water mains), increased stormwater runoff will only create greater pressure on our infrastructure

This must be addressed more comprehensively in the Code.

We do not support offsets.

Recommendations

Recommendation 7.1 – The Code must not include offsets

8. Conflicts of Codes

There are competing requirements regarding access to services and authorities (including water, power, gas, communications, NBN, recycled water and many more).

AILA SA expresses concern that the Code does not address the complexity of services that usually pass through the front (and often rear) yards of properties. Every service authority has different requirements, which may prevent any greening or garden areas. This often prevents the provision of deep soil zones.

This is an area that with greater coordination and clarity of requirements would assist in achieving better and greener outcomes

Recommendations

Recommendation 8.1 – The Code includes guidance on services

We recommend the Code includes references and guidance on service locations

9. Performance Outcomes and ‘Deemed to Satisfy’

Performance outcomes, or the desired outcome for developments is specified in the Code, however no criteria is clearly identified for developments to achieve these outcomes.

Performance Outcomes provide qualitative controls for development against criteria to achieve the outcome. This may be in place of not meeting a Deemed to Satisfy rule, or where no Deemed to Satisfy option is provided. AILA SA has some concerns with both.

The Deemed to Satisfy pathway provides the minimum requirements to meet the Performance Outcome. Where ‘deemed to satisfy’ criteria are included, often the minimum requirement does little to raise the standard above current business as usual.

Performance Outcomes offer greater flexibility and the ability to deliver an outcome in several ways. While we support Performance Outcomes, we feel that in several instances there is not enough clarity around the outcome to reasonably assess against. Language must be clear so as not to be left open to interpretation.

How is success measured?

AILA SA supports the improvements as a minimum and highlight that the Code needs to be flexible to constantly evolve and improve to meet changing targets and environments. We need to strive for creating healthy environments for the people of SA.

Recommendations

Recommendation 9.1 - The Code must include more 'deemed to satisfy' provisions

We recommend the Code includes further opportunities to increase the minimum requirements, as well as opportunities to include more Deemed to Satisfy provisions where a desired outcome is known.

10. Planning and Development Fund and Open Space Contributions

AILA SA strongly advocates for reform of the Planning and Development Fund and developer contributions scheme to review the funding of greening, improvements and the performance of our streets and public spaces.

The review should include how the fund utilises the contributions in the locale or place where it was generated, or partially used to fund public improvements in the areas of the development.

This will improve design outcomes generally by encouraging better quality design outcomes in developments as the area.

Recommendations

Recommendation 10.1 – The Code includes reform of funding of public space improvements

We recommend a review of the Planning and Development fund includes criteria for eligibility, distribution and utilisation of datasets to influence priorities.

11. Community Consultation

Outcomes of testing the Code could form part of a suite of information material available to the public to demonstrate some of the expected outcomes. 3D modelling with the use of 3D Adelaide could provide examples of what well designed density and infill can achieve.

This could be done in several ways, one of which is through a design competition. The Victorian Government's Department of Environment, Land, Water and Planning in association with the Office of the Victorian Government Architect is currently running a Future Homes design competition 'to produce exemplar apartment designs that support better developments in Melbourne's suburbs. Winners will have the opportunity to work with DELWP to inform potential planning reforms. <https://www.vic.gov.au/future-homes>

In 2013 LandCorp, with the City of Fremantle and the Office of the Government Architect ran a design competition to demonstrate innovative design for flexible infill housing and affordable living. The result 'provides an excellent demonstration of a housing solution that bridges the gap between the single house and a large apartment block'. <https://www.landcorp.com.au/innovation/wgv/initiatives/Gen-Y-House/>

Recommendations

Recommendation 11.1 – The Code includes demonstration projects

We recommend the Code includes a demonstration project to enable the public to experience first-hand what the 'new urban form' could look like. This could be beneficial in two ways. Firstly, to alleviate fears around higher density and secondly, to raise expectations so that 'the market' drives developers to deliver higher quality, better designed outcomes.

12. Other Issues

12.1 Local Design Review

AILA SA supports the establishment of Local Design Review to positively contribute to raising the quality of development in South Australia, and we look forward to providing feedback on the proposed model and structure in March 2020. We note that funding will need to include managing a new system.

AILA SA supports the transition of the process of referral to the Government Architect to the Design Overlay within the Code.

The referral to the Government Architect provides the SCAP with advice relating to design quality when undertaking their assessment. As part of this transition, a clause exempting a referral to the Government Architect where it relates to a variation of a development application that has previously (a) been referred to the Government Architect, or (b) been given development authorisation under the Act has also been carried over. Currently, this enables a variation to an application to be lodged that meets the requirements in the Design Overlay for referral yet does not require referral to the Government Architect. AILA SA requests that the Commission strongly considers removal of the clause relating to variations in the interest of maintaining design quality and reducing the risks of negative impacts through value management, as well as meeting the intent of the PDI Act.

However, if there are variations to approved schemes project referred to Government Architect, the Act currently does not require a need to go back for review once changes made. We express our concern at this lack of provision.

Recommendations

Recommendation 12.1 – The Code incorporates transition process regarding referrals to the Government Architect

AILA SA supports the transition of the process of referral to the Government Architect to the Design Overlay within the Code.

12.2 Healthy Parks Healthy People SA

We draw your attention to [Healthy Parks Healthy People SA](#) (HPHP SA) a co-designed, co-managed Public Health Partnership Authority initiative between the South Australian Department for Health and Wellbeing (DHW) and Department for Environment and Water (DEW).

The [HPHP](#) SA partnership has identified six key principles for green infrastructure in urban settings.

These principles will help to keep growing our city in a way that protects and enhances our existing green spaces alongside the creation of new open space destinations.

Healthy Parks Healthy People SA has developed a document [Creating Greener Places for Healthy and Sustainable Communities: Ideas for Quality Green Public Space in South Australia](#) to explore how we can all work together to enhance our green spaces.

The Healthy Parks Healthy People SA, Quality Green Public Space (QGPS) Reference Group is a collective of partner organisations with interest in promoting the critical importance of the protection, provision and improvement of quality green public space in a densifying urban environment. As urban infill continues to dominate new forms of residential development in South Australia, we are seeing a continued decline in private green space and tree canopy.

This will create irreversible and damaging consequences for climate resilience, biodiversity, and human health and wellbeing.

Australian Institute of Landscape Architects
South Australian Chapter

Address GPO Box 1584, Adelaide, SA, 5001
Email sa@aila.org.au
ACN No. 008 531 851 | ABN 84 008 531 851

The members of the Healthy Parks Healthy People SA, Quality Green Public Space Reference Group broadly support the inclusion of WSUD principles, private green space and tree planting provisions in phase three of the Draft Planning and Design Code.

Urban greening plays a critical role in protecting people and property from extreme weather events such as heatwaves and storms. It is vital that the water sensitive urban design and green urban initiatives are embedded in planning and development at every scale.

Green urban areas are known to foster and enable direct and meaningful experiences with nature, which can be transformative for: the physical and mental health outcomes of individuals, the development of children, strengthening personal relationships with family, building safer and better-connected neighbourhoods, developing a strong economy, and nurturing environmental attitudes and values in the community.

12.3 Upskilling of Design Professionals

AILA SA strongly advocates for the upskilling of planning and design professionals involved in the assessment process as the new Planning and Design Code is implemented. This needs to be in all areas relating to the development of both built and natural environments, to ensure there are champions within the government to advocate for high quality design outcomes. This will be critical to support the State in achieving targets as set out in the 30 Year Plan for Greater Adelaide.

Particular areas for upskilling could include design assessment skills, reading architectural and landscape plans, biodiversity, WSUD etc to support advice being provided to applicants.

13. Summary

AILA SA supports the reform of the planning system and the inclusion of design within the new Code.

We have outlined 21 recommendations across 12 areas of concern which will not only improve the Code but will also provide more certainty for new and existing developments.

- Recommendation 1.1 – The Code must embed design in the Code
- Recommendation 1.2 – The Code must include an Advocacy Campaign
- Recommendation 1.3 – The Code must include Design Guidelines
- Recommendation 2.1 – The Code must include new Concept Plans
- Recommendation 2.2 - The Code must include Performance-based outcomes
- Recommendation 3.1.1 The Code must include trees in private development
- Recommendation 3.1.2 The Code must include guidance for tree and plant selection
- Recommendation 3.2.1 – The Code must include Performance Based Landscape Guidelines
- Recommendation 3.2.2 – The Code must mandate 7% site area for deep soil zone for medium to high density sites
- Recommendation 3.3.1 The Code must include a mechanism to integrate existing Significant and Regulated Trees
- Recommendation 3.4.1 – The Code must integrate and reference the Significant and Regulated Tree legislation
- Recommendation 3.5 – The Code must protect all existing Regulated and Significant Trees
- Recommendation 4.1 - The Code must define vegetated surfaces
- Recommendation 4.2 – The Code must include Performance Outcomes that do not have a Deemed to Satisfy requirement

- Recommendation 5.1 – The Code considers development of best practice garden design case studies
- Recommendation 6.1 – The Code includes car parking guidelines
- Recommendation 7.1 – The Code must not include offsets
- Recommendation 8.1 – The Code includes guidance on services
- Recommendation 9.1 - The Code must include more 'deemed to satisfy' provisions
- Recommendation 10.1 – The Code includes reform of funding of public space improvements
- Recommendation 11.1 – The Code includes demonstration projects
- Recommendation 12.1 – The Code incorporates transition process regarding referrals to the Government Architect

We are supportive of the process to date and trust our feedback is taken on board and incorporated in the final Code.

We thank you once again for the opportunity to provide comment and for your engagement during the process. If there are any aspects of our feedback, recommendations and commentary that require clarification or further discussion please do not hesitate to contact Sally Bolton, State Chapter Manager, or myself.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Bennett', with a long horizontal stroke extending to the right.

Daniel Bennett
AILA SA State President
Registered Landscape Architect #1183
Fellow, AILA