

Sally Smith  
Executive Director  
Planning and Land Use Services  
Department of Planning, Transport and Infrastructure



28 February 2020

Dear Sally Smith

**HEALTHY PARKS HEALTHY PEOPLE SA LEADERSHIP TEAM'S RESPONSE TO DRAFT  
PLANNING AND DESIGN CODE PHASE THREE (URBAN AREAS)**

Healthy Parks Healthy People SA (HPHP) is a nature-based approach enabling the environment and health sectors to work collaboratively and focus resources towards implementing innovative approaches to health and wellbeing and conservation. The program has been established through a formalised Public Health Partner Authority Agreement between the Department for Health and Wellbeing and the Department for Environment and Water.

HPHP is supported by a high-level governance and decision making group (the Leadership Team). The primary purpose of the Leadership Team is to provide expert advice and strategic oversight to inform and endorse the long term outcomes and priorities of HPHP.

The Leadership Team recognise the potential of the Planning and Design Code in supporting several of the HPHPSA's identified priority areas, in particular; *Green Infrastructure in Urban Settings*. This has been flagged as a priority focus area for the program and DPTI have been principal sponsors of the [HPHP Green Infrastructure in Urban Settings Action Plan](#).

The current membership of the HPHPSA Leadership Team includes:

- Mr Brenton Grear (Co - Chair) - Acting Executive Director, National Parks and Wildlife, Department for Environment and Water
- Ms Lyn Dean (Co - Chair) – Chief Executive, Wellbeing SA
- Mr Parry Agius – Representing Aboriginal Lands Trust and Aboriginal Biodiversity Conservation Foundation, Former Presiding Member of Alinytjara Wilurara Natural Resources Management Board
- Ms Tanya McGregor - Director, Aboriginal Health Strategy, Department for Health and Wellbeing
- Professor Chris Daniels – Director, Cleland Wildlife Park, DEW and Adjunct Professor, of Biology, School of Pharmacy and Medical Sciences, University of South Australia
- Professor Phil Weinstein, Head of School of Biological Sciences, University of Adelaide
- Mr Craig Wilkins - Chief Executive Officer, Conservation Council SA
- Ms Michele Herriot – National Vice-President, Australian Health Promotion Association

The Leadership Team is grateful for this opportunity to contribute to the Planning and Design Code (the Code) Phase Three consultation.

We understand the importance of developing cities that positively support both the health and wellbeing of residents, and the health and sustainability of our natural environment; the HPHP agenda promotes the inherent connection between the environment and people.

As the population of the Adelaide Metropolitan area increases and ages, the need to co-locate housing and services is becoming increasingly important for providing a high quality of life for residents. In recognition of this, the densification of inner and middle ring suburbs, close to schools, shops, entertainment and employment has become a key target for the State Government<sup>i</sup>. It is well recognised that the densification of our urban areas provides protection against urban sprawl impacts on agricultural and conservation land, while also enabling the efficient implementation and use of key infrastructure.

There is however evidence<sup>ii</sup> that densification, when implemented poorly, can have major impacts on public health and wellbeing. The loss of the urban tree canopy and the increase of impervious, dark coloured surfaces in the suburbs are known to increase the probability of increased temperatures in urban areas.

Within Adelaide, the densifying urban form has resulted in 17% of the local council areas of Unley, Burnside, Adelaide, Prospect, Walkerville, Campbelltown, Tea Tree Gully, Salisbury and Norwood, St Peters and Payneham identified as being urban heat islands<sup>iii</sup>. Urban heat islands are areas that are 125m x 125m in size and at least 2°C above average. They can lead to a disproportionate build-up of urban heat, often in areas that are not readily able to release that heat effectively.

In considering the implications of the Planning Reform as a once in a generation opportunity to shape Adelaide's future patterns of development, the Leadership Team wish to share the following comments, concerns and recommendations for consideration in finalising the Planning and Design Code:

- The Leadership Team support the inclusion of Water Sensitive Urban Design (WSUD) principles, private open space and tree planting provisions in the Code. However it is suggested that a comprehensive monitoring and evaluation process underpins the implementation of the first generation of the code to test its effectiveness as implementation occurs in a range of contexts. There is also a need to consider how compliance with the Code will be monitored, as this is a recognised shortfall in the current planning system. Stronger consideration of Water Sensitive Urban Design deemed to satisfy criteria for non- residential development, and development of varied forms and scales should also be applied.
- The inclusion of private open space, landscaping and tree planting provisions support the growing evidence of the multitude of health and environmental benefits provided through urban green space:
  - Trees are known to be the most effective mitigation strategy for the urban heat island effect, even when compared with light coloured paving and roofs and the installation of green roofs and walls.<sup>ix</sup> Private residential garden spaces play the predominant role in supporting councils and state governments to mitigate the effects of the urban heat island and to achieve canopy cover targets, given that the majority of urban vegetation is located in these private spaces.<sup>iv, v</sup>
  - Urban trees are known to have strong positive impacts on the social, physical and mental health and wellbeing of individuals and communities. The inclusion of trees on private properties is likely to have similar health and wellbeing benefits to residents and their neighbours. If trees are planted in garden spaces which face streets, laneways and other public access spaces, these benefits have the potential to extend to the broader community. Other health and wellbeing benefits of trees include:
    - Improved air quality, including; lowered prevalence of asthma<sup>vi</sup> <sup>vii</sup> and greater

- filtration of pollutants.<sup>viii ix x</sup>
    - o Decreased cardio metabolic conditions.<sup>vii, ix</sup>
    - o Improved mental health and wellbeing.<sup>vii</sup>
    - o Reductions in UV Radiation<sup>vi, vii</sup>
    - o Improved Nutrition.<sup>vii</sup>
    - o Reducing the impacts of cold climate extremes.<sup>vi, xi</sup>
    - o Reducing the impacts of hot climate extremes.<sup>vi, vii, xi, iv, v, vii, x, xii, xiii</sup>
  - Mitigating the impact of heat waves through urban cooling also prevents heat related deaths, which are known to be most prevalent among older people, and those with mental and behavioural disorders.
  - Evidence suggests that:
    - o in heat events, shading provided by large trees can reduce energy use and associated bills by 10%.<sup>vi</sup>
    - o Strategic placement of trees around buildings has been found to reduce air conditioning requirements by up to 30% and heating requirements by up to 20-50%.<sup>x, xi, xiv</sup>
    - o Vegetation has been found to be more effective at increasing the albedo effect than other mitigation strategies, including pale roofs and light coloured paths and roads.<sup>v,vi</sup>
- The Leadership Team wishes to emphasise the need for the Code to deliver provisions to ensure that higher density infill and greyfield development occurs in a manner that improves and enhances both population health and wellbeing and the health of our natural environment. We recommend stronger integration between the Code, the State Planning Policies and other planning tools. For example, there is opportunity for the Code to more clearly and directly reference existing design standards and guidelines, such as the [Streets for People Compendium](#), [South Australia's Principles of Good Design](#), and the [Good Design for Great Neighbourhoods and Places](#). Public Realm Design Standards are recognised to be a further gap in the Code, where adequate guidance is not offered. We consider this to be a missed opportunity for protecting and enhancing the delivery of urban green space and tree canopy through the public realm, and the resultant opportunities a well-designed public realm offers in terms of promoting health and wellbeing.
- We urge further consideration of the potential 'triggers' within the Code, to assure that the removal/reduction of private, open space (as a result of infill development) is adequately supplemented with useable, public, open, green space. This should recognise that public green space needs to be located within the vicinity of where the loss of private green space is occurring.
- The Leadership Team proposes the development of tools to support the retention of sufficient levels of open, green space within urban areas. One suggestion is for adequate mapping and an overlay of tree canopy and green infrastructure to be developed for inclusion in the second generation of the Code to ensure identification of priority areas. Perhaps where canopy cover is low, residents should be offered access to subsidies and advice on appropriate species choice.
- It is incredibly difficult to test the potential opportunities and shortcomings of the draft Code without applying it across many local contexts and development types. Therefore the Leadership Team suggests that the second generation of the Code is immediately progressed, and that feedback opportunities to shape this second generation are available from the time of the full trial of the Code, through to the first six months of activation. We do commend the decision to postpone the launch of Phase Two and Phase Three of the Code (Announced 7 February 2020); to allow for stakeholders to build greater confidence and feel better prepared to use the new ePlanning portal, before it goes live.
- The Leadership Team supports the need for housing diversity which must be inclusive of affordability as well as type/design. In order to achieve this, the we recommend that

opportunities to better coordinate planning of infill development are explored to avoid poor outcomes in terms of the loss of mature trees and greenspace, and poor design considerations in terms of social and environmental sustainability, dominance of garages/parking on frontage, and impact on footpath connectivity. Currently, the fact that 40% of all infill is small and ratios of 1:1, 1:2, 1:3 and 1:4 replacement are predominant suggests that small infill policy is not succeeding. The missing middle can only succeed if more precinct master planning approaches are applied and homogenous and lowest cost development choices are therefore discouraged – master planning design consideration should apply not only to green and brownfield development, but where possible, to grey and infill development areas as well. This could be achieved through incentivising certain forms of infill development.

- The Leadership Team is supportive of the measures to allow more co-housing options, recognising that the redeveloped/remodelled existing housing options that are showcased in the People and Neighbourhoods discussion paper are not affordable for all, as these options predominantly apply to older bungalow homes in prestigious neighbourhoods.
- We suggest that there should be further consideration in relation to the transport needs of high infill suburbs. There is no reference to the transport requirements for the 'missing middle' in the People and Neighbourhoods discussion paper. Furthermore:
  - Cycling networks across Adelaide metropolitan remain disjointed and disconnected. Further strategies should be explored, and implemented to ensure that cycling is an easy choice as a mode of transport.
  - The Code shows no evidence of a strategic approach to public transport improvement and expansion.
  - The Code shows no evidence of strategies to enhance residential development mix and walkability/connectivity around middle suburb activity centres.
- There is a tenuous relationship between 'missing middle' and walkability – we cannot assume that this form of development will be successful, especially if tree canopy is depleting and transport connectivity is not simultaneously strengthened.
- There is also a tension between car parking provisions, walkable neighbourhoods, and tree canopy/green space. The Adelaide Metropolitan area as a whole should be working towards a reduction in the provision of car parking in to the future. This includes both on-street and off-street car-parking. The broader benefits of reducing off-street parking include minimising the tension between driveway crossovers in higher density new development competing with street trees and landscaping, and therefore impacting amenity, walkability, and opportunities of green cover and WSUD features in the public realm. The amenity and walkability of streetscapes, as well as greater opportunities for landscaping, street trees and green cover would also be strengthened by a reduction in on-street car parking. In order to support a transition towards a more sustainable and less car-dependent transport culture in Adelaide moving in to the future, a general shift in the way that car-parking is prioritised is required. We see this is an overall goal to strengthen the liveability of a densifying metropolitan Adelaide, and the opportunities for a stronger connection between people and their environment in South Australia.

The Leadership Team is very concerned about the decline in tree canopy across Metropolitan Adelaide. As has been highlighted, the evidence suggests that this decline is largely due to small infill development. Whilst the tree planting policy is strongly supported as a positive strategy of the Code, it should be noted that many tree species require decades of growth before maturing to a stage where they are able to provide a full and shady canopy. Replacing an existing mature tree with one or even several young trees, does not account for this interim loss in canopy cover. We recommend that the Code provide incentives to ensure that both the retention of existing trees and the planting of new and replacement trees occurs wherever possible.

More about the Healthy Parks Healthy People SA program can be found online at [www.sahealth.sa.gov.au/HealthyParksHealthyPeopleSA](http://www.sahealth.sa.gov.au/HealthyParksHealthyPeopleSA).

Once again, thank you for the opportunity to present our feedback.

Our members are keenly interested in contributing to the draft of the second generation of the Planning and Development Code.

Yours sincerely



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Healthy Parks Healthy People SA  
Leadership Team

**28 / 02 / 2020**



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