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**From:** Benjamin Cooper [REDACTED]  
**Sent:** Tuesday, 3 March 2020 8:25 PM  
**To:** DPTI:Planning Engagement  
**Subject:** People and Neighbourhoods Paper and Code Submission  
**Attachments:** AIUS SA\_People and Neighbourhoods and Planning Reforms and Code Submission.pdf; Attachment 1 AIUS SA\_Submission\_Housing and Homelessness Strategy South Australia.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi

**RE: AIUS People and Neighbourhoods Paper and Code Submission**

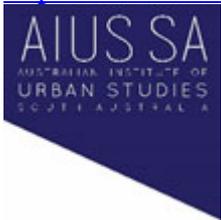
Please accept our late submission on the People and Neighbourhoods Paper and Code. (The AIUS SA needed to consolidate our final position before submitting).

Thanks again and please let me know if you have any questions . Cheers, Ben

**Benjamin Cooper**

President, Australian Institute of Urban Studies SA

<http://www.aiussa.org.au/>



Sent with [ProtonMail](#) Secure Email.



Mr Michael Lennon  
Chairperson, State Planning Commission  
Level 5, 50 Flinders Street,  
ADELAIDE SA 5000

28 February 2020

Dear Michael

### **People and Neighbourhoods Policy Discussion Paper and Planning and Design Code**

Thank you for providing the Australian Institute of Urban Studies - South Australia (AIUS SA) the opportunity to comment on the People and Neighbourhoods Policy Discussion Paper (Paper).

The State Planning Commission (Commission) is commended for preparing a paper that explores the way the planning system can enable the creation of more well-designed, appropriate, sustainable and affordable housing outcomes and neighbourhoods.

As you are aware, the AIUS SA is a forward looking, independent, not-for-profit, membership based organisation that exists to provoke rich conversation, deep discussion and rigorous debate about urban life in Adelaide and South Australia. Our membership is broad and balanced and includes individuals and corporate members from the public, private, not-for-profit and academic sectors. Our members have qualifications and expertise in urban planning, law, design, industrial design, business, health, sustainability, industry and policy amongst many others. As such, the AIUS SA provides a unique and diverse view on South Australia's urban and regional future.

In relation to the Policy, the AIUS SA supports;

- Strategies and policies that continue to promote and prioritise infill within established urban areas. Ideally, infill and renewal is delivered through master planned developments, however the reality of our development patterns is for infill and renewal to be incremental, piecemeal and opportunistic. It can be expected that a greater percentage of new housing will be delivered this way in the future. As such, greater emphasis needs to be applied to policies and tools that enhance design outcomes and social and economic inclusion;
- Appropriate celebration and protection of heritage through Overlays, including additional powers of direction for the Heritage Minister;
- Strategies and policies that support the renewal of our residential neighbourhoods, including the incorporation of a wider variety of uses where appropriate;
- Housing policies that address global warming / climate change and improve ecological sustainability, including new requirements for blue and green infrastructure. In addition there is an opportunity to improve energy efficiency through

design with improved housing and building orientation policies. For example, there might be specific reference to configurations such as;

- lots / dwellings that are orientated north - south could have wider frontages to capture the low winter sun from the north and minimise exposure to the afternoon summer sun from the west; and
- lots / dwellings that are orientated east – west could have narrower frontages to minimise exposure to the afternoon summer sun from the west and maximise the low winter sun from the north;
- Rationalisation of allotment sizes and frontage widths that set a new minimum standards benchmark. In urban areas, consideration should be given for reduced frontages when the dwelling can be rear loaded (for example detached and semi-detached frontages down 9m to 6m);
- Improvements to the Affordable Housing Policy. The planning system has a significant role to play in improving and increasing the supply of affordable housing for low and moderate income households. This is a nation leading policy and there is significant opportunity for expansion and strengthening of this policy in the future; and
- The introduction of the Housing Renewal module to ensure essential new social and affordable housing infrastructure can be delivered in all urban areas.

Where we will live in the future is where we already live – in our existing urban areas and neighbourhoods. Approaches to support the delivery of ‘missing middle’ housing (next generation granny flats, six packs, fonzie / mews units, soho, mixed use etc.) are supported and should be encouraged in all our existing residential areas and neighbourhoods. The policy challenge and opportunity is to support the development (or the conversion) of the most appropriate housing types for the relevant location.

It’s important to note that the AIUS SA has not provided a detailed submission on Phase 3 of the Code as the AIUS SA prefers to explore directions, movements, strategies and policies across the urban and regional sectors at a higher and strategic level. I do take this opportunity to share that the AIUS SA has been made aware of significant concerns from many individuals and organisations in respect to both the general and localised policies in the Code, as well as how they have been locally applied to areas across Greater Adelaide (as well as regional South Australia).

Whilst the AIUS SA supports the strategic intent of the People and Neighbourhoods components in the Code, it questions whether they have been applied as well as they could have been in the version of the Code that was released for consultation (this view could also be applied for most policies in the Code).

The AIUS SA congratulates and supports the extension to the implementation of Phase 2 and Phase 3 of the Code. This extension provides the Department and the Commission a number of additional planning reform opportunities going forward:

1. Following consideration of submissions and incorporation of the updated Code polices into the e-planning system – the Department and the Commission undertake a further round of targeted consultation with key stakeholders and local governments (May > July). An additional opportunity to consult on the Code in its eventual operational form would be highly consistent with the intent and the principles of the [Community Engagement Charter](#).
2. Select the policy reforms that can be included in the implementation of the Code and defer some policy reforms (such as policies that have strong community and industry concerns / resistance, are high risk and or may create unknown / unforeseeable / poor outcomes) for further consultation and implementation at a later date (perhaps late 2020 or 2021).

The AIUS SA would welcome an opportunity to discuss these opportunities further. In addition the AIUS SA attaches its submissions on the Housing Strategy, which also includes commentary and opportunities for housing in the planning system.

On behalf of the AIUS SA, I look forward to working with the Commission and the Department to improve the planning system and create a more sustainable and prosperous South Australia. If you would like to discuss this submission in further detail or any other matter, please don't hesitate to contact me on [REDACTED] [REDACTED] [REDACTED] or by email [president@aiussa.org.au](mailto:president@aiussa.org.au)

A handwritten signature in blue ink, appearing to read 'Benjamin Cooper', written in a cursive style.

**Benjamin Cooper**  
**President, Australian Institute of Urban Studies – South Australia**



30 August 2019

Mr Gary Storkey  
Chair, Housing & Homelessness Strategy Taskforce  
c/- SA Housing Authority  
GPO Box 1669 Adelaide SA 5001

Dear Mr Storkey,

**Re: Strategic Intent for the Housing and Homelessness Strategy**

Thank you for providing the Australian Institute of Urban Studies - South Australia (AIUS SA) the opportunity to comment on the Strategic Intent for the Housing and Homelessness Strategy.

The Taskforce is commended for its collaborative approach to developing and workshopping the Strategic Intent. A number of our Board members and members took part in the workshops, and appreciated the depth and breadth of attendees and issues discussed. We recognise the complexity involved in delivering your stated vision across many interested parties and relevant authorities.

The AIUS SA is a forward looking, independent, not-for-profit, membership-based organisation that exists to provoke rich conversation, deep discussion and rigorous debate about urban life in Adelaide and South Australia. Our membership is broad and balanced, and includes individuals and corporate members from the public, private, not-for-profit and academic sectors. Our members have qualifications and expertise in urban planning, law, design, industrial design, business, health, sustainability, industry and policy amongst many others, and they inform our strategy. As such, the AIUS SA provides a unique and diverse view on South Australia's urban and regional future.

In the final Housing and Homelessness Strategy, we want to see an approach that is proactive rather than reactive – supporting the conditions of life that mitigate homelessness, isolation and crisis point *before* they occur. This approach aligns with the national framework for Emergency Management, which is shifting its focus away from response and recovery and towards prevention and preparedness. In that system, every \$1 spent on resilience saves \$8 on response – we believe the housing system can learn from this.

For our housing system to truly put customers at the centre, we need to shift our thinking from short-term affordable housing to long-term affordable living. Reducing ongoing living costs through improvements to our housing stock and urban infrastructure will improve life opportunity, quality of life, and community resilience.

According to the recent Greater Sydney Commission report, The Pulse of Greater Sydney, Australians want cities in which they live close to jobs and have reasonable commuting times. They want access to parks and green space, and relief from ever-increasing urban heat. The Cooperative Research Centre (CRC) for Low Carbon Living has delivered numerous on-ground research projects demonstrating how cities can be sustainable, liveable and affordable.



The Housing and Homelessness Strategy should explore how it can better engage with the Planning Reforms, including by leveraging new e-planning capabilities to better integrate data with decision-making. This new system could allow great improvements to how we plan, regulate and manage housing, informed by spatial data such as the Index of Disadvantage, distance to work and school, active transport connections, and exposure to natural hazards.

Climate resilience is a key emerging future need that is not currently addressed in the Strategic Intent. Our future housing – most of which either already exists or is being built right now – must mitigate its exposure to escalating physical risks (like heat, fire, inundation and coastal erosion) in order to manage escalating financial, insurance and legal risks. Globally, the financial, legal and insurance sectors are moving quickly to factor climate risks into their decision making. There are already significant implications for authorities, developers, homeowners and residents. Insurance is becoming unaffordable for many homes in Australia, and as of 1 July 2019, banks are factoring climate risk into their decision-making. This means banks may reduce how much they are willing to lend against the value of assets that are exposed to natural hazards, or not lend at all. Authorities are being sued for making decisions that do not disclose and manage climate risks. This should be a major concern and area of focused attention in our housing system.

Our housing system needs appropriate yet compelling regulation to promote the best lived environments for all important facets of life now and in the future. This includes our brick and mortar environments and connections with critical infrastructure; our connections with the physical world, including access to green infrastructure and protection from hazards; and our intangible connections, our social fabric and health and wellbeing supports. Given the currency of the Planning Reforms and this Taskforce, now is the ideal time for the planning and housing systems to integrate their thinking and approaches to deliver the best possible outcomes for our communities and our State.

On behalf of the AIUS SA, I look forward to further engagement with the Taskforce and SA Housing Authority to ensure all South Australians can access housing that is liveable and affordable, and promotes health, wellbeing and community resilience.

If you would like to discuss this submission in further detail or any other matter, please don't hesitate to contact me on [president@aiussa.org.au](mailto:president@aiussa.org.au).

Yours sincerely

**Reb Rowe**

Vice-President

Australian Institute of Urban Studies – South Australia