



Response:

Planning and Design codes

February 2020

To:
DPTI, Planning reform
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The South Australian Active Living Coalition

The Heart Foundation has auspiced the South Australian Active Living Coalition (the Coalition) since 2007.

The Coalition is a collaboration between key Government and non-Government organisations. The purpose is to advocate for and support the integration of active living principles into the built environment.

Active living is defined as a way of life that integrates physical activity into daily routines. Our current patterns of living, that rely less on local facilities and opportunities and more on dispersed and distant centres of work, education, shopping and recreation that are typically only accessible by private car have led to a reduction in opportunities to be physically active in daily life and have contributed to increasingly sedentary lifestyles.

Executive Summary

Thank you for the opportunity to comment on the Planning and Design Codes.

This reform reflects a significant positive shift in planning policy processes and direction, in that health, wellbeing and active living are acknowledged and provided for in ways that could not have been envisaged twenty years ago.

Nevertheless, the SA Active Living Coalition (Coalition) does have concerns that the new planning system does not adequately improve the health outcomes for South Australia, or facilitate healthy planning, but instead may reduce the capacity of our urban centres to respond to climate change, and contribute to reducing active living which in turn increases health inequities.

The Coalition examined a number of General Development policies relevant to promoting health, wellbeing and active living. General comment is provided below, with more technical detail and commentary / suggestions included in the second half of our submission.

The main issues that stood out to the Coalition are below:

Mitigating urban heat as a result of densification. Heatwaves remain our biggest public health emergencies. One result of densification of our suburbs is a loss of tree cover and soft landscaping, resulting in hotter homes and streets – partially negating efforts towards energy efficient buildings and forcing residents towards expensive energy-hungry solutions to provide thermal comfort.

The Coalition welcomes and supports new requirement which help to green and cool the urban environment. Greening streetscapes and homes provides many health benefits, both physical and mental; reduces crime through promoting passive surveillance, and cools air temperatures to support active transport and recreation. Trees have previously been treated separately from development; however, tree cover has been found by cities world-wide to be the most effective method for reducing urban heat. Their specific requirements for retention along with the planting of new trees need to be a central part of future planning and development in South Australia.

The Coalition is aware of, and supports the submission provided by Water Sensitive SA as practical guidance for ensuring the planting of trees and green spaces in the e public and private realm have a chance of surviving our harsh climate and thrive to provide greening and cooling of urban areas.

Fencing and surveillance over streets. In examining policies relevant to active living in the draft Code, one standout was the unclear and potentially conflicting relationship between clauses relating to safety (passive surveillance over streets), lack of guidance for front fencing (height, permeability) and consideration of private open space forward of building lines.

From an active living perspective, maintaining natural surveillance from buildings to streets and vice versa is critical to walkability and cycling; feeling safe, child and age-friendly cities, and encouraging use of public transport. Yet this can all be undone if high solid fencing is allowed across frontages, and even encouraged by promotion of private open space being fenced if forward of the building line. The individual clauses as well as the interaction between them should be re-examined by DPTI to ensure

consistency across development policies and typologies, and results in buildings that interact with the street that supports safety and community-minded outcomes.

Missing definitions. In examining development policies it was noted that some important definitions are missing. For example; there is no definition of ‘primary living room’ which is important as the clause in which it is used (Design in Urban Areas; PO 15.1) provides guidance on whether windows providing natural/outdoor views are required in which rooms in a dwelling. Other clauses mention internal living areas and habitable rooms but ‘primary living room’ is only mentioned in this clause. It needs to be clear if bedrooms are part of this definition. Previous proposals to allow development with bedrooms without windows and utilising ‘borrowed light’ have been controversial and often rejected in South Australia. The Coalition supports bedrooms being included in requiring an external outlook to provide natural light, natural views, and natural ventilation into sleeping spaces.

Private Open Space.

The Coalition notes that the total POS component of a development and the minimum POS adjacent to habitable rooms remain unchanged from the current planning system. Appreciates at Residential development – building levels that studios have a requirement for private open space – which we understand is additional to current requirements.

Assessing what is required under the draft Code. When considering the requirements for the outside a dwelling on a site, a potential developer must consider both the requirements for private open space and soft landscaping. Assessing private open space is considering where you can site it outside a habitable room that meets the minimum dimensions, and where to make up the required balance (if necessary) inside walkways and potentially forward of the building line. The proposed new landscaping clauses outline how much soft landscaping is required where. In considering the two sets of requirements, the following emerged:

- It is not immediately apparent why the block size ranges used to work out requirements for both are different? Coalition members found this interaction between the two related clauses made working out the outdoor requirements for a development site unnecessarily difficult.
- Although there are new soft landscaping requirements adjacent driveways and front yards, there does not appear to be any soft landscaping requirements for private open space.

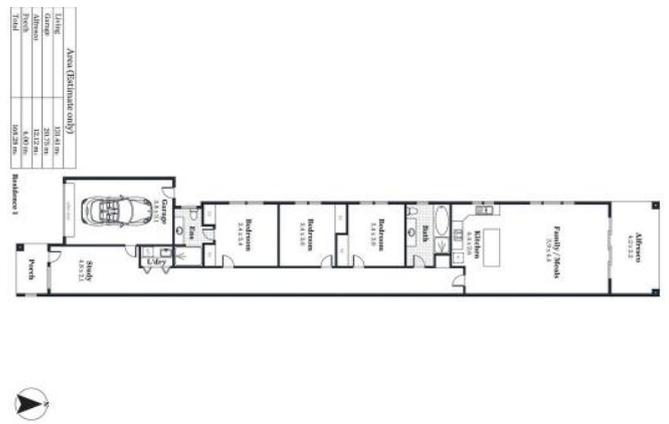
Does the Code enable usable private open space and mitigate heat? Most at ground private open space off a habitable room is used for seating and/or alfresco dining, similar to the use of balconies. This function of POS requires 2m of the 3m minimum width would be hard surface to support outdoor furniture. Coalition members have concern that the current system and proposed Code allows development that increases urban heat and provides very little natural outlook from living spaces. Development such as the ones below are found often in urban areas which have been re-zoned to allow single suburban homes to be demolished and replaced by multiple dwellings.



<https://www.realestate.com.au/property-townhouse-sa-plympton-132804422>

The question is Can 16m² of private open space with no requirement for soft surface adequately compensate for 2, potentially 3 storeys of dwelling with all the accompanying hard surfaces? Would a requirement for soft landscaping within private open spaces be able to mitigate the heating effect of constructing multiple 2 or 3 storey townhouses on a block that used to house a single dwelling if a requirement for soft landscaping was included?

On the same street is a set of 3 single level developments on narrow, long blocks with only a 2.2m width 12m² 'alfresco' area at the back (less than current or Code requirements of 16m² and yet it has still been approved). The draft Code allows for land between the side of the building and side boundary to be counted towards private open space (even then it's difficult to see how 24m² was achieved in this instance excluding service areas), but it's difficult to see how development like this meets the desired proposed outcomes at PO 20.3



<https://www.realestate.com.au/property-house-sa-plympton-132575698>

Student accommodation. During consideration of the Design in Urban Areas there needs to be clarification of what can be considered student accommodation (the definition does not seem to fit many examples of student housing), whether it belongs with other forms of supported accommodation, and clarification of private open space requirements (if any) if being assessed through the 'performance outcomes' pathway.

Universal Design. Requirements for consideration of universal design appeared patchily within *Design in Urban Areas* without any rationale being immediately obvious for this being so. Our reading noted

that universal design was a requirement in buildings of 4 building levels or more but not 3 building levels or less? It was not clear from the draft clause how many dwellings should be ageing/disability friendly in a 4 building level or more multi-dwelling application? Were there any difference in requirements for universal design if the development is to be serviced apartments?

Surprisingly, universal design did not feature in requirements relating to Supported Accommodation, Housing for Aged Persons and People with Disabilities – except in relation to outdoor landscaping and lift access.

Reference to guidelines or guidance for planners, developers and designers on what constitutes universal design; and what could be reasonably expected for a dwelling typology being assessed under this General Development Policy is needed. South Australia already has the *Age-friendly Living Guidelines for Residential Development* or nationally there are the *Liveable Housing Design Guidelines*.

Guidance on technical matters. The experience of the Coalition has been that although supportive policy in the previous Planning Policy Library was important to have included, sometimes it can be difficult to assess whether desired outcomes are being met – e.g. what does a supportive environment for cycling and walking actually look like on a plan of land division?

How can someone who is not properly trained evaluate performance outcomes? Guidance is necessary on complicated technical aspects that a planner may not be familiar with; in order to assess more technical aspects of the Code such as water sensitive design, universal design, and open space design. Guidance, whether prepared by DPTI or respected outside organisations is needed and should be potentially referred to within the Code. Using an agreed set of guidance documents allow developers, designers and assessors to be clear what is, and isn't, included as a potential performance outcome for a development typology.

Public Open Space. The Coalition found the General Development Policy on Open Space and Recreation which provides practical direction to developers, designers and planners on many aspects of a successful and health promoting open space. However, we found the Design and Siting (we suggest it should be changed to Amenity) aspects were low on detail and may result in open spaces being less usable than their potential. There has been multiple, research-based guidance documents issued regarding optimising design for open spaces and some key health promoting aspects have been suggested by the Coalition. Against a background of higher density development with minimum private open space – particularly for active recreation – the design and provision of supportive infrastructure within public open space has never been more important.

General Development Policies – Design in Urban Areas

ALL DEVELOPMENT

<p>External Appearance</p> <p>PO 1.2 Where zero or minor setbacks are desirable, development provides shelter over footpaths to positively contribute to the walkability and comfort of the public realm.</p>	<p>Coalition strongly supports this performance outcome:</p> <ul style="list-style-type: none"> • verandahs promote all-weather walking for transport (to and from work or public transport stops), health or recreation (dog walking) and can improve the experience of being on the street. • Shading building frontages can also benefit energy performance by minimising incidental solar radiation, thereby cooling the building.
<p>Safety</p> <ul style="list-style-type: none"> • PO 2.1 Development maximises opportunities for passive surveillance of the public realm by providing clear lines of sight, appropriate lighting and the use of visually permeable screening wherever practicable. • PO 2.3 Buildings designed with safe, perceptible and direct access from public street frontages and vehicle parking areas. • PO 2.4 Development at street level designed to maximise opportunities for passive surveillance of adjacent public realm. • PO 2.5 Common areas and entry points of buildings (such as the foyer areas of residential buildings), and non-residential land uses at street level, maximise passive surveillance from the public realm to the inside of the building at night. 	<p>The Coalition supports several clauses drawn from CPTED guidelines to increase safety and the perception of safety, which in turns promotes active transport.</p> <p>Building frontages that maximise natural surveillance improve safety and feelings of safety. This can be achieved by designing buildings to overlook streets, providing well-lit entrances, and limiting long stretches of blank walls and inactive spaces. Transparent building facades, which allow people inside to see the street and vice-versa, are another feature which increases natural surveillance.</p> <p>Providing safe, well-lit building entrances that face the street and are directly accessible from the street and pedestrian networks (i.e., footpaths), car parks and public transport stops (within close proximity) is important to encourage active transport.</p> <p>However, the Coalition questions how PO 2.4 interacts with current Code fencing requirements (PO 8.1 and in Private Open Space) which allow fencing of up to 1.8m (but don't require permeability). Solid or even partially permeable fencing up to 1.8m either completely or mostly blocks views to the street and vice versa – eliminating or reducing the opportunity for passive surveillance.</p>

	<p>This is even complicated by the proposal to allow ‘private open space’ to be forward of the building line. If open space forward of the building line is the majority of open space provided – experience shows that people will want to fence it to give them privacy, negating many other clauses in the Code aimed at maximising passive surveillance and public/private realm interaction.</p>
<p>Landscaping</p> <ul style="list-style-type: none"> • PO 3.1 <i>Landscaped (including trees), permeable open spaces incorporated to:</i> <ul style="list-style-type: none"> (a) <i>minimise heat absorption and reflection;</i> (b) <i>maximise shade and shelter;</i> (c) <i>maximise stormwater infiltration; and</i> (d) <i>enhance the appearance of land and streetscapes.</i> 	<p>The Coalition supports specific direction that permeable green landscaping is required for all forms of development. The inclusion of landscaping will not only reduce heat and enhance the appearance of streets and buildings, it will maximise the chance of providing green/natural outlooks from windows</p> <p>Studies have found a consistent link between access to nature and a range of positive psychological outcomes. Natural views whether at home or in the workplace have been associated with wellbeing and satisfaction, attention and cognitive functioning (Heart Foundation’s Healthy Active by Design)</p> <p>PO 3.1 could add (e) <i>support health by providing natural views from windows</i></p>
<p>Environmental Performance</p> <ul style="list-style-type: none"> • PO 4.1 Buildings sited, oriented and designed to maximise natural sunlight access and ventilation to main activity areas, habitable rooms, common areas and open spaces. • PO 4.2 Buildings sited and designed to maximise passive environmental performance and minimise energy consumption and reliance on mechanical systems, such as heating and cooling. • PO 4.3 Buildings incorporate climate responsive techniques and features such as building and window orientation, use of eaves, 	<p>The Coalition supports measures to improve environmental performance and maintain thermal comfort while relying as little as possible on mechanical systems. Heatwaves are the biggest public health emergency in South Australia and utility prices can limit how much a person can afford to cool a home.</p> <p>There is only so much a building can achieve if the overall urban environment is heating due to intensification of housing and impermeable surfaces without enough tree canopy, green landscaping and permeable surfaces.</p>

<p>verandahs and shading structures, water harvesting, <u>at ground landscaping</u>, green walls, green roofs and photovoltaic cells.</p>	<p>For these reasons the Coalition strongly supports the Water Sensitive SA submission relevant to these clauses as follows:</p> <p><i>Buildings incorporate climate responsive techniques and features such as building and window orientation, use of eaves, verandahs and shading structures, water harvesting and use, at ground landscaping, green walls, green roofs and photovoltaic cells.</i></p> <p>It is the use of the harvested rainwater at the lot scale that delivers the climate resilience, whether outdoors to supplement or substitute for mains water OR indoors to support water conservation.</p>
<p>Car Parking Appearance</p> <ul style="list-style-type: none"> • PO 6.3 Pedestrian connections that are safe, legible, direct and accessible are provided between parking areas and the development. • PO 6.4 Street level vehicle parking areas that are open to the sky are landscaped to provide shade and reduce solar heat absorption and reflection. • DTS / DPF 6.4 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 4m diameter spaced for each 10 car parking spaces provided and a landscaped strip on any road frontage of a minimum dimension of 1m. • PO 6.5 Vehicle parking areas are landscaped along public frontages, allotment boundaries and between double rows of parking spaces. • DTS / DPF 6.5 Vehicle parking areas comprising 10 or more car parking spaces contain a vegetated landscaped strip of a minimum dimension of: (a) 1m along all public road frontages and allotment boundaries; and (b) 0.6m between double rows of car parking spaces. • PO 6.6 Vehicle parking areas and associated driveways are landscaped to shade and positively contribute to amenity. 	<p>The Coalition strongly supports the strengthening in the draft Code of car-park appearance and broader consideration of pedestrians; either those that have driven to the carpark, used public transport; or the entire trip was via walking/cycling/wheelchair/gopher.</p> <p>Unshaded carparks are not only unsightly but contribute to urban heat. Walking and other forms of active transport are encouraged when:</p> <ul style="list-style-type: none"> • greenery reduces urban heat • greenery helps to mitigate even the impression of heat • greenery encourages feeling of safety • feeling safe encourages walking. <p>Concern - the draft Code may not allow for all the potential WSUD and shading benefits possible with greening carparks, while recognising that what the draft Code has proposed is an improvement on current requirements.</p> <p>The Coalition strongly supports PO 6.7 which appears to apply to even small infill/single residences would represent a large departure from current practice.</p>

<ul style="list-style-type: none"> PO 6.7 Vehicle parking areas and accessways incorporate integrated stormwater management techniques such as permeable or porous surfaces, infiltration systems, drainage swales or rain gardens that integrate with landscaping requirements. 	<p>Car parks are the easiest development types to integrate WSUD measures, as there are generally limited conflicts of WSUD measures with underground services or footings of structures, given the vast nature of the space. This is an easy win and should be taken at every opportunity.</p> <p>Carparks that fail to require such minimum standards represent “underperforming asphalt”. Local parks and recreational areas must carry the load of every missed opportunity to better manage stormwater in carparks, through increased inundation to manage flood events. Carparks must manage their stormwater onsite so open spaces can better provide their primary functions to the community, offering amenity and recreation.</p>
<p>Fences and walls</p> <ul style="list-style-type: none"> PO 8.1 Fences, walls and retaining walls of <u>sufficient height</u> to maintain privacy and security without unreasonably impacting visual amenity and adjoining land’s access to sunlight. PO 8.2 Landscaping incorporated on the low side of retaining walls that are visible from public roads and public open space to minimise visual impacts. 	<p>The treatment of fences and walls in this section of the draft Code is of concern, particularly how it could interact with other requirements for passive surveillance onto streets; a key enable of walking, cycling and active living.</p> <p>The Coalition could not find further guidance on fence / wall heights or front fences to the public realm in this section.</p> <p>Is it possible that 8.1 is referring to side and back boundary fences? Otherwise it is not clear how this clause fits with PO 2.4 <i>Development at street level designed to maximise opportunities for passive surveillance of adjacent public realm?</i> PO 2.5 <i>Common areas and entry points of buildings (such as the foyer areas of residential buildings), and non-residential land uses at street level, maximise passive surveillance from the public realm to the inside of the building at night.</i></p> <p>The <i>Design in Rural Areas</i> General Development Policy uses the following which makes clear when privacy and security is paramount:</p> <p style="padding-left: 40px;"><i>Fences and walls</i> <i>PO 9.1 Fences, walls and retaining walls alongside and rear boundaries of sufficient height to maintain privacy and security</i></p>

	<p><i>without unreasonably impacting visual amenity and adjoining land's access to sunlight.</i></p> <p>The Coalition recommends that the application of this current clause P.O 8.1 be clarified in where it does and doesn't apply. This clause appears to be written for side and back fences.</p> <p>Direction for front fencing that supports passive surveillance should be substituted in its place. Fencing over 1.2m high blocks natural surveillance of the street and should be avoided.</p> <p>The Coalition supports landscaping on low side of retaining walls (PO 8.2) visible from public roads and public open space as part of efforts to green and cool the urban environment.</p>
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ALL DEVELOPMENT - 4 OR MORE BUILDING LEVELS

<p>Landscaping</p> <ul style="list-style-type: none"> • PO 10.1 Development facing a street provides a well landscaped area that contains a deep soil space to accommodate a tree of a species and size adequate to provide shade, contribute to tree canopy targets and soften the appearance of buildings. • DTS / DPF 10.1 Buildings provide a 4m by 4m deep soil space in front of the building to accommodate a medium to large tree, except where no building setback from front property boundaries is desired. • PO 10.2 Deep soil zones provided to retain existing vegetation or provide areas that can accommodate new deep root vegetation, including tall trees with large canopies to provide shade and soften the appearance of multi storey buildings. 	<p>The Coalition strongly supports new requirements for soft landscaping to green and cool the urban environment and support physical and mental health.</p> <p>The Coalition recommends that significant trees be offered the same level of protection under the Code as currently exists under relevant Acts, Regulations and Development Plans.</p> <p>Practical solutions must be found that will allow for long term viability of trees and landscaping surrounding higher density development.</p>
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<ul style="list-style-type: none"> • DTS / DPF 10.2 Multi-storey development provides deep soil zones and incorporate trees at not less than the following rates, except in a location or zone where full site coverage is desired: • PO 10.3 Deep soil zones provided with access to natural light to assist in maintaining vegetation health. • PO 10.4 Unless separated by a public road or reserve, development sites adjacent to any zone that has a primary purpose of accommodating low rise residential development incorporate a deep soil zone along the common boundary, to enable medium to large trees to be retained or established to assist in screening new buildings of 3 or more storeys in height. • DTS / DPF 10.4 Building elements of 3 or more storeys in height are set back at least 6m from a zone boundary in which a deep soil zone area is incorporated. 	
<p>Environmental</p> <ul style="list-style-type: none"> • PO 11.1 Development minimises detrimental micro-climatic impacts on adjacent land and buildings. • PO 11.2 Development incorporates sustainable design techniques and features such as window orientation, eaves and shading structures, water harvesting, green walls, and roof designs that enable the provision of rain water tanks (where they are not provided elsewhere on site), green roofs and photovoltaic cells. • PO 11.3 Development of 5 or more storeys, or 21m or more in height (as measured from natural ground level and excluding rooftop mounted mechanical plant and equipment), designed to minimise the impacts of wind through measures such as: <ul style="list-style-type: none"> ○ a podium at the base of a tall tower and aligned with the street to deflect wind away from the street; ○ substantial verandahs around a building to deflect downward travelling wind flows over pedestrian areas; 	<p>The Coalition notes that many of the same features that provide sustainability benefits also provide thermal comfort and health benefits. Improvements to thermal comfort have been shown to help mitigate heat-related deaths and a range of other health conditions including:</p> <ul style="list-style-type: none"> • Blood pressure and upper respiratory tract infections • Hypertension, sinusitis and general health • Self-related health, wheezing, absenteeism, and visits to a general practitioner (Healthy Active by Design) <p>In workplaces significant associations were also identified between overall comfort (lighting, ventilation, thermal comfort, and noise) and perceived productivity. In housing lack of thermal insulation and bedrooms located under but near the roof also increase the risk of mortality. (Heart Foundation’s Healthy Active by Design)</p> <p>Design features that improve the microclimate such as designing to mitigate the wind tunnel effect are important to promoting comfort for</p>

<ul style="list-style-type: none">○ the placement of buildings and use of setbacks to deflect the wind at ground level; and/or avoid tall shear facades that create windy conditions at street level.	people on the street and for active living and active travel. These become especially important in the context of zones of concentrated higher density development where the effect is more likely to be pronounced.
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ALL RESIDENTIAL DEVELOPMENT

<p>External Appearance</p> <ul style="list-style-type: none">• PO 14.1 Dwellings incorporate windows facing primary street frontages to encourage passive surveillance and make a positive contribution to the streetscape.• DTS/DPF 14.1 Each dwelling with a frontage to a public street includes at least one window with a total window area of at least 2m² facing the primary street, from a habitable room that has a minimum room dimension of 2.7m.• PO 14.2 Dwellings incorporate entry doors within street frontages to address the street and provide a legible entry point for visitors.• DTS/DPF 14.2 Dwellings with a frontage to a public street have the entry door facing the public street	<p>The Coalition support the CPTED measures included in these clauses and requirements to present a positive contribution to the streetscape; including an overlooking window from a habitable room and the front door facing the street.</p> <p>However there is still the question as to whether fencing requirements elsewhere in this Development Policy, either stand-alone or in private open space, forward of the building line, help or hinder surveillance if solid front fences of are able to be constructed in front of the doors and windows facing the street (PO 8.1)</p>
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<p>Outlook and Amenity</p> <ul style="list-style-type: none"> • PO 15.1 Primary living rooms have an external outlook to provide a high standard of amenity for occupants. • DTS / DPF 15.1 Primary living rooms (other than kitchens) incorporate a window with an external outlook towards the street frontage or private open space. • PO 15.2 Bedrooms separated or shielded from active communal recreation areas, common access areas and vehicle parking areas and access ways to mitigate noise and artificial light intrusion. 	<p>There does not appear to be a definition of ‘primary living room’ in the Code. This should be clarified so it is clear which rooms are required to have an external outlook – does this include bedrooms?</p>
<p>Ancillary Development</p> <p>PO 16.2 Ancillary buildings and structures do not impede on-site functional requirements such as private open space provision, car parking requirements or result in over-development of the site.</p> <p>DTS / DPF 16.2 Ancillary buildings and structures do not result in:</p> <ul style="list-style-type: none"> • less private open space than specified in Design in Urban Areas Table 1 – Outdoor Open Space; • less on-site car parking than specified in Transport, Access and Parking Table 1 - Off-street Car Parking Requirements; and • the total roofed floor area of all existing or proposed ancillary building(s) or structure(s) exceeding 60m². 	<p>The Coalition supports ancillary development which can allow for multi-generational living; including accommodating adult children/parents or ageing-in place. Ancillary development has the potential to add to housing diversity in areas of traditionally large blocks and low density; which can support a broader range of services being viable within walking or cycling distance of homes.</p> <p>The proposed clauses seem sensible including the preservation of the private open space and car-parking requirements of the original dwelling.</p>

RESIDENTIAL DEVELOPMENT - 3 BUILDING LEVELS OR LESS

<p>Overlooking / Visual Privacy</p> <p>PO 19.1 Development mitigates direct overlooking of habitable rooms and private open spaces of dwellings.</p> <p>DTS / DPF 19.1 Upper level windows facing side or rear boundaries shared with an allotment put to residential use: (a) are permanently obscured to a height of 1.5m above finished floor level that is fixed or not capable of being opened more than 200mm;</p> <p style="padding-left: 40px;">(b) have sill heights greater than or equal to 1.5m above finished floor level; or</p> <p style="padding-left: 40px;">(c) incorporate screening to a height of 1.5m above finished floor level; and (d) the building will not have a balcony or terrace on an upper building level, other than where the longest side of that balcony or terrace will face a road (including any road reserve), or reserve (including any land held as open space), and is at least 15m from the private open space of any other dwelling</p>	<p>The Coalition supports these clauses as concerns over loss of privacy is a key reason for resistance to increasing housing density. Higher density development should not decrease the quality of life for existing residents, and density done well should add to the amenity and liveability of the area. .</p>
<p>Private Open Space (POS)</p> <p>PO 20.1 Dwellings provided with suitable sized areas of usable private open space to meet the needs of occupants.</p> <p>DTS / DPF 20.1 Private open space provided in accordance with Design in Urban Areas Table 1 - Outdoor Open Space.</p> <p>PO 20.2 Private open space positioned to provide convenient access from internal living areas.</p>	<p>The Coalition strongly agrees that the total POS component of a development and the minimum POS adjacent to habitable rooms remain unchanged from the current planning system.</p> <p>Minimum widths adjacent habitable rooms are 3m at ground level for blocks up to 300m², 24m² total and 16m² off a habitable room. Minimum width is 4m at ground level if block 300-500m² with 16m² from habitable room (lounge/kitchen) and a total of 60m² overall</p> <p>Although there are new soft landscaping requirements adjacent driveways and front yards there does not appear to be any soft landscaping requirements for private open space.</p>

DTS / DPF 20.2 Private open space is directly accessible from a habitable room, other than a bedroom or study.

PO 20.3 Private open space is positioned and designed to:

- (a) provide useable outdoor space that suits the needs of occupants;
- (b) take advantage of desirable orientation and vistas;
- (c) animate the street frontage by encouraging activity between buildings and public streets;
- (d) adequately define public and private space when located forward of the building; and
- (e) prolong activity along street frontages by protecting against inclement weather.

DTS / DPF 20.3 A portion of the private open space specified in DTS 20.1 can be provided forward of the primary building line where:

- a) the area is fenced to a maximum height of 1.8m;
- b) the area incorporates a verandah with a minimum dimension of 1.5m
- c) an area is provided behind the primary building line that has the minimum dimensions identified in DTS 20.1

The Coalition believes that the small minimum widths proposed for private open spaces are inadequate against a backdrop of 2-3 storey development on small lots under 300m². This will continue to exacerbate the poor forms of development we are seeing built in Adelaide currently that do nothing to assist in maintaining or improving the tree canopy, and actively contribute to the urban heat island affect. Will continue poor development that increase urban heat. We note and support the AILA SA submission that articulates this issue in more considered detail.

Development like this set of townhouses has private open space that is hot in summer, cold in winter, provides almost zero permeable surface, increases urban heat and provides no green outlook for living spaces (except when a tree has been planted in another yard). The awkward shape of the private open space on the front townhouse makes it difficult to understand how it could be useable or suit the needs of residents.



Table 1 - Outdoor Open Space

Dwelling Type	Dwelling / Site Configuration	Minimum Rate
Detached dwelling Semi-detached dwelling Row dwelling Group dwelling	Site area >1,000m ²	Total area: 20% of total site area Adjacent to habitable room: 10% total site area / minimum dimension 4m.
	Site area 500m ² - 1,000m ²	Total area: 80m ² Adjacent to habitable room: 24m ² / minimum dimension 4m.
	Site area 300m ² - 500m ²	Total area: 60m ² Adjacent to habitable room: 16m ² / minimum dimension 4m.
	Site area <300m ²	Total area: 24m ² Adjacent to habitable room: 16m ² / minimum dimension 3m
Cabin or caravan (permanently fixed to the ground) in a Residential Park Zone or Caravan and Tourist Park Zone		Total area: 16m ² , which may be used as second car parking space, provided on each site intended for residential occupation.
Apartments	Dwellings at ground level:	
	- All types	15m ² / minimum dimension 3m
	Dwellings located above ground level:	
	- Studio	4m ² / minimum dimension 1.8m
	- One bedroom dwelling	8m ² / minimum dimension 2.1m
- Two bedroom dwelling	11m ² / minimum dimension 2.4m	
- Three + bedroom dwelling	15 m ² / minimum dimension 2.6m	

d)

e)

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 areas are embedded into 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.

At ground-level, landscaping performs multiple functions over and above a balcony and space forward of the building line is limited in how much privacy it can provide occupants due to safety and surveillance concerns.

PO 20.3 seems concerned with 'private' open space animating street frontages rather than useable private space for residents. While a small front yard and verandah, combined with the other clauses requiring windows and front doors overlooking the street can provide good natural surveillance over the street and interaction between both realms. However there is an inherent conflict in requiring private space to be defined (clause d) presumably via fencing (which is indicated in a DTS pathway),

Clarify what part (e) means?

- It is also difficult to understand the intent of part (e). Is this clause indicating that the design of private open space forward of the building line should have a verandah? It is not clear how having a verandah in wet/hot weather keep street frontages active if it has to be clearly defined as private open space? Especially if it is fenced to block visibility between houses and the street. Average eye-line heights in Australia are well below 1.8m so fence is above eye level. This clause needs to be deleted or re-worded so that the meaning is clear.
- This same point is relevant for DTS 20.3. If a private open space in a front yard is fenced up to 1.8m with no requirement for the fence to be permeable, how does a verandah help with animating or prolonging activity along street frontages?

	<p>The Code definition of Private Open Space:</p> <p>Private Open Space Means an outdoor area associated with a dwelling that:</p> <ul style="list-style-type: none"> (a) is for the exclusive use of the occupants of that dwelling; (b) has a minimum dimension of 1.8 metres; and (c) is not fully enclosed. <p>Private open space may include balconies, terraces, decks and areas in between the dwelling and side boundaries (as we understand) but does not include areas used for bin storage, laundry drying, rainwater tanks, utilities, driveways and vehicle parking areas.</p> <p>The common publicly understood definition of ‘private’ is that it is not easily surveyed by the public and combined with the new Code definition of private open space (not fully enclosed?) makes interpreting what is private open space difficult.</p> <p>The Coalition strongly recommends that relevant clauses be amended to require:</p> <ul style="list-style-type: none"> • Fences at front yards required to be low and permeable to allow for surveillance and interaction between street and dwelling. Elsewhere in the Code; DTS / DPF 26.1 (4 or more storeys) allows only a 1.2m high maximum at street level. • Minimum private open space is provided behind the building line in the form of side or back courtyards in the Performance Outcome pathway <u>as it is in the DTS pathway</u>. • Private Open Space required to have a portion that is soft landscaping
<p>Landscaping</p> <p>PO 21.1 Soft landscaping incorporated into development to:</p> <ul style="list-style-type: none"> (a) minimise heat absorption and reflection; (b) contribute shade and shelter; (c) provide for stormwater infiltration and biodiversity; and (d) enhance the appearance of land and streetscapes. 	<p>Coalition supports soft landscaping and tree planting as they perform many functions that support health and wellbeing including</p> <ul style="list-style-type: none"> • Thermal comfort of occupants without having to utilise as much mechanical (and expensive) heating and cooling • Natural views from windows promoting mental wellbeing • Enhances streetscape and greens neighbourhood and reduces urban heat all which promote active forms of transport and recreation. • Urban greening also supports feelings of safety and can reduce the psychological impact of noise (Heart Foundation’s Healthy Active by Design).

DTS / DPF 21.1 Residential development incorporates areas for soft landscaping with a minimum dimension of 0.5 metres provided in accordance with the following:

Dwelling-site-area-(or-in-the-case-of-residential-flat-or-group-average-site-area)-(square-metres)π	%-of-site-π
<200π	15%π
201---450π	20%π
>450π	25%π

(a) ; and (b) 25% of any land between the road boundary and the primary building line is provided for soft landscaping with a minimum dimension of 0.5 metres.

PO 21.2 Tree planting provided to:

- a) contribute shade and shelter;
- b) improve outlook for occupants of buildings;
- c) reduce the apparent mass of buildings;
- d) contribute to biodiversity;
- e) mitigate urban heat; and
- f) improve the amenity and character of streetscapes and contribute to attractive vistas.

Support comments from Water Sensitive SA on the practicalities of providing soft landscaping including that **0.7m** is the minimum width required to allow for enough room for plants to grow and thrive.

Water Sensitive Design

PO 22.1 Residential development designed to capture and re-use stormwater to:

- (a) maximise conservation of water resources;
- (b) manage peak stormwater runoff flows and volume to ensure the carrying capacities of downstream systems are not overloaded; and
- (c) manage stormwater runoff quality.

The Coalition supports these water sensitive urban design clauses, for the reasons previously stated but also because the capacity to maintain soft landscaping without needing to draw on (expensive) potable water on a year-round basis. Should the ability to use stormwater to maintain green space be included in PO 22.1?

Maintaining gardens and soft landscaping help to preserve natural views from living spaces and reduce urban heat both which promote health.

Car parking, access and manoeuvrability

The Coalition supports these measures to reduce the amount of impervious driveway that can be built on a site; with the intent for providing for enough space for soft

<p>PO 23.3 Driveways and access points located and designed to facilitate safe access and egress while maximising land available for street tree planting, landscaped street frontages and on-street parking.</p> <p>DTS / DPF 23.3 Driveways and access points:</p> <ul style="list-style-type: none"> a) for sites with a frontage to a public road of 12m or less, have a maximum width of 3.2m measured at the property boundary and are the only access point provided on the site; or b) for sites with a frontage to a public road greater than 12m: i. have a maximum width of 6m measured at the property and are the only access point provided on the site; or ii. have a maximum width of 3.2 metres measured at the property boundary and no more than two access points are provided on site. <p>PO 23.4 Vehicle access is safe, convenient, minimises interruption to the operation of public roads and does not interfere with street infrastructure or street trees.</p>	<p>landscaping; improving green outlook and streetscape, reducing impact of urban heat, improving energy efficiency of homes, and water management.</p>
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The maximum proposed widths of driveways and conditions is supported to minimise the impact on street frontage noting that in some locations, narrow road width will necessitate a wider kerb opening than the driveway to facilitate access.

The aim should be to ensure that on-site parking is adequate to meet the needs of the development so that this is always used where available in preference to on street parking to maintain safe access, particularly for vulnerable road users.

RESIDENTIAL DEVELOPMENT - 4 OR MORE BUILDING LEVELS (INCLUDING SERVICED APARTMENTS)

<p>Outlook and Visual Privacy</p> <p>PO 26.1 Ground level dwellings have a satisfactory short-range visual outlook to public, communal or private open space.</p> <p>DTS / DPF 26.1 Buildings: (a) provide a habitable room at ground or first level with a window facing toward the street; and (b) limit the height / extent of solid walls or fences facing the street to 1.2m high above the footpath level or, where higher, to 50% of the site frontage.</p> <p>PO 26.2 The visual privacy of ground level dwellings within multi-level buildings is protected.</p> <p>DTS / DPF 26.2 The finished floor level of ground level dwellings in multi-storey developments is raised by up to 1.2m.</p>	<p>The Coalition support outlook and visual privacy clauses for both resident comfort and interaction with the surrounding streetscape.</p> <p>Research shows that as well as providing views for the dwellings at ground level, dwellings which open to the footpath and present a ‘friendly face’ and ‘eyes on the street’ and thereby encourages walking and other public realm active living.</p> <p>The requirement for raising the ground floor also helps provide some visual privacy for residents.</p>
<p>Apartment Amenity</p> <p>PO 28.1 Residential accommodation within multi-level buildings have habitable rooms, windows and balconies designed and positioned to be separated from those of other dwellings and accommodation to provide visual and acoustic privacy and allow for natural ventilation and the infiltration of daylight into interior and outdoor spaces.</p>	<p>The Coalition supports measures to improve environmental performance and maintain thermal comfort while relying as little as possible on mechanical systems.</p> <p>Managing acoustic privacy is critical to resident satisfaction and wellbeing. The Coalition is supportive of the new requirement that all dwellings must have a private open space/balcony. As we look at ways of accommodating people as they age, particularly people on lower incomes, there is likely to</p>

<p>DTS / DPF 28.1 Habitable rooms and balconies of independent dwellings and accommodation are separated by at least 6m from one another where there is a direct 'line of sight' between them and 3m or more from a side or rear property boundary.</p> <p>PO 28.2 Balconies are designed, positioned and integrated into the overall architectural form and detail of the development to:</p> <p>(a) respond to daylight, wind, and acoustic conditions to maximise comfort and provide visual privacy; and</p> <p>(b) allow views and casual surveillance of the street while providing for safety and visual privacy of nearby living spaces and private outdoor areas.</p> <p>DTS / DPF 28.2 Balconies utilise a combination (or thereof) of the following design elements: (a) sunscreens; (b) pergolas; (c) louvres; (d) green facades; or (e) openable walls.</p> <p>PO 28.3 Balconies are of sufficient size and depth to accommodate outdoor seating and promote indoor / outdoor living.</p> <p>DTS / DPF 28.3 Balconies open directly from a habitable room and incorporate:</p> <p>(a) a minimum dimension of 2m or more and are well proportioned to accommodate a table and 2 chairs; or</p> <p>(b) a minimum dimension of 2.4m and are well proportioned to accommodate a table and 4 chairs.</p>	<p>be an increase in studio apartments as full time residences. All households require some small amount of space to sit outdoors and/or entertain a guest.</p> <p>It is not clear why is the requirement for balcony sizes differs for apartments over four stories than you have for apartments in buildings of 3 levels or less? Why not use the same requirements e.g.: DTS / DPF 20.1 Private open space provided in accordance with Design in Urban Areas Table 1 - Outdoor Open Space?</p> <p>The current proposed DTS/DPF 28.3 does not make it clear when either a 2m or 2.4m minimum width should be applied by the assessing planner. The Coalition Recommends adopting the Design in Urban Areas Table 1 – Outdoor Open Space.</p>
<p>PO 28.4 Dwellings are provided with sufficient space for storage to meet likely occupant needs.</p>	<p>The Coalition particularly supports this if it includes secure bicycle storage.</p>

<p>DTS / DPF 28.4 Dwellings (not including student accommodation or serviced apartments) are provided with storage at the following rates:</p> <ul style="list-style-type: none"> (a) studio: 6m³ or more; (b) 1 bedroom dwelling / apartment: 8m³ or more; (c) 2 bedroom dwelling / apartment: 10m³ or more; and (d) 3+ bedroom dwelling / apartment: 12m³; and (e) 50% or more of the storage volume is provided within the dwelling. <p>PO 28.5 Universal design features are incorporated to provide options for people living with disabilities or limited mobility and / or to facilitate ageing in place.</p>	<p>The incorporation of universal design features is welcomed by the Coalition. It is however not clear what kind of universal design features should be encouraged in an individual apartment in a 4 storey or more apartment block (wider doorways, level surfaces?)</p> <p>It is also not clear if the universal design features should be in all apartments or just in a certain number as a performance outcome. This clause should be made more descriptive, a reference to universal design guidelines, and clarified whether this applies to all/a percentage of units in the block. Does it apply to service apartments?</p> <p>The Liveable Housing Guidelines or the South Australian Age-friendly Living Guidelines for Residential Development would be good places to refer planners, developers and designers to.</p>
<p>Common Areas</p> <p>PO 30.1 The size of lifts, lobbies and corridors is sufficient to accommodate movement of bicycles, strollers, mobility aids and visitor waiting areas. Support although you think it would be covered in Building Code of Australia!</p> <p>DTS / DPF 30.1 Common corridor or circulation areas:</p> <ul style="list-style-type: none"> (a) have a minimum ceiling height of 2.7m; (b) provide access to no more than 8 dwellings; and (c) incorporate a wider section of apartment entries where the corridors exceed 12m in length from a core 	<p>The Coalition supports the provision of adequate size of internal circulation spaces for bicycles, strollers and mobility aids. However, this should be standard as part of the Building Code of Australia.</p> <p>There are no minimum widths specified in the DTS/DPF 30.1 that would provide guidance on accommodating mobility aids.</p>

GROUP DWELLINGS, RESIDENTIAL FLAT BUILDINGS AND BATTLE-AXE DEVELOPMENT

Group dwelling: Means 1 of a group of 2 or more detached buildings, each of which is used as a dwelling and 1 or more of which has a site without a frontage to a public road or to a road proposed in a plan of land division that is the subject of a current development authorisation

Residential flat dwelling: Means a single building in which there are 2 or more dwellings.

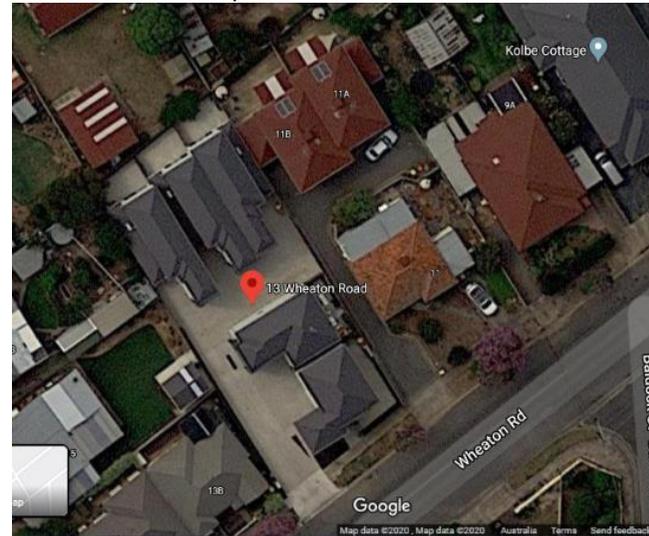
<p>Communal Open Space</p> <p>PO 32.1 Communal open space provided where private open space provision is inadequate to meet the needs of occupants or where the nature of the development is such that private open space is not ordinarily provided.</p>	<p>It is not clear under which circumstances would communal open space be acceptable if not enough private open space? Group dwellings, residential flat buildings and battle-axe development would normally be expected to provide private open space at the usual rate. It is difficult to see why battle-axe development would be given exemptions when much of battle-axe development is detached or semi-detached dwellings.</p> <p>Student accommodation, nursing homes and supported accommodation is covered under a different sub-section which are the obvious exceptions to providing private open space.</p> <p>Is this a potential exemption for conversion of historic buildings to dwellings which may not be able to add-on balconies etc due to preservation of heritage or structural issues?</p> <p>This clause should be removed unless there is a reason it needs to be here, and if so, that should be indicated in the clause.</p>
<p>Landscaping</p> <p>PO 34.1 Landscaping is provided between dwellings and common driveways to improve the outlook for occupants and improve the appearance of common areas.</p> <p>DTS/ DPF 34.1 Other than where located directly in front of a garage or directly adjacent a building entry door, soft landscaping with a minimum dimension of 1m is provided between a dwelling and common driveway.</p>	<p>The Coalition supports requirements for landscapng particularly for group battle-axe developments to reduce poor-quality development such as this recent build below</p>

PO 34.2 Landscaping is provided that improves the appearance of common driveways.

DTS / DPF 34.2 Where a common driveway is located directly adjacent the side or rear boundary of the site, soft landscaping with a minimum dimension of 1m is provided between the driveway and site boundary (excluding along the perimeter of a passing point required in DTS 34.3).



Landscaping in this view represents all landscaping for 5-3bedroom + 2 bathroom townhouses. Narrow width of landscaping means poor growth and limited shade potential.



SUPPORTED ACCOMMODATION, HOUSING FOR AGED PERSONS, AND PEOPLE WITH DISABILITIES

Supported accommodation: Means premises in which residential accommodation is provided to persons requiring/together with regular medical and/or personal care assistance.

Student accommodation: Mean premises used to accommodate students in room or dormitory style accommodation that is not self-contained and that includes common facilities for shared use by student occupants such as: (a) shared cooking facilities and/or the provision of meals; (b) common rooms and recreation areas; (c) shared laundry facilities or a laundry service; or (d) shared bathroom facilities. Excludes dwelling and residential flat building.

<p>PO 40.1 Student accommodation is designed to provide safe, secure, attractive, convenient and comfortable living conditions for residents, including an internal layout and facilities that are designed to provide sufficient space and amenity for the requirements of student life and promote social interaction.</p> <p>DTS / DPF 41.1 Student accommodation provides: (a) a range of living options that meet a variety of accommodation needs, such as one bedroom, two bedroom and disability access units; (b) common or shared facilities to enable a more efficient use of space, including:</p> <ul style="list-style-type: none"> i. shared cooking, laundry and external drying facilities. ii. internal and external communal and private open space provided in accordance with Design in Urban Areas Table 1 - Outdoor Open Space. iii. common storage facilities at the rate of 8 cubic metres for every 2 dwellings or students. iv. common on-site parking to meet anticipated demand in accordance with Transport, Access and Parking Table 1 - Off-street Car Parking Requirements; and v. secure and sheltered bicycle parking at the rate of one space for every 2 students. <p>PO 40.2 Student accommodation designed to provide easy adaptation of the building to accommodate an alternative use of the building in the event it is no longer required for student housing.</p> <p>DTS 40.2 None are applicable.</p>	<p>Clarifies requirements for bike parking, storage and provision of private open space. Provision of private open space (if following the DTS pathway) attached to student units will enable the building be able to be adapted for other residential purposes should the demand for student accommodation subside.</p> <p>There does seem to be some problems with the current definition of student accommodation in the draft Code. Much student accommodation advertises itself as ‘fully self-contained’ with units containing kitchenettes and bathrooms eg UniLodge, Atira as well common areas being provided. Is this then considered student accommodation under the Code? Or does this become a residential flat building containing dwellings and therefore triggering different requirements depending on building height and numbers of dwellings?</p> <p>Is it supported accommodation for students only when spaces must be rented through a management scheme and only to students? This may stop potentially poor-quality dwellings being constructed under the guise of ‘student accommodation’.</p> <p>If student accommodation is not self-contained then the only likely adaptation of the building is to other forms of supported accommodation e.g aged or disability care? Where is the guidance for the assessing planner on what constitutes features for the ‘easy adaptation’ of student accommodation to other forms of supported accommodation? The Coalition also recommends that student housing should be located within walking distance (1km) of a university/TAFE campus to reduce traffic</p>
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	congestion and in areas with sufficient and regular public transport with infrastructure that supports walking and cycling
Missing performance outcome for SUPPORTED ACCOMMODATION, HOUSING FOR AGED PERSONS, AND PEOPLE WITH DISABILITIES?	In the section on Residential Buildings of 4 levels or more there is; <i>PO 28.5 Universal design features are incorporated to provide options for people living with disabilities or limited mobility and / or to facilitate ageing in place</i> It seems puzzling that there isn't a similar requirement under this section. Housing for aged persons/people with disabilities should meet a minimum standard?
Movement and Access PO 37.1 Development designed to support safe and convenient access and movement for residents by providing: (a) ground-level access or lifted access to all units; (b) level entry porches, ramps, paths, driveways, passenger loading areas and areas adjacent to footpaths that allow for the passing of wheelchairs and resting places; (c) car parks with gradients no steeper than 1-in-40, and of sufficient area to provide for wheelchair manoeuvrability; and (d) kerb ramps at pedestrian crossing points	The Coalition does support the requirements for landscaping and footpaths at level to support mobility Aged-care accommodation co-located with mixed-use centres gives older residents easier access to services.

Land Division in Urban Areas

Desired Outcome (DO) DO 1 Land division that: <ul style="list-style-type: none"> • integrates and allocates adequate and suitable land for the preservation of site features of value including significant vegetation, watercourses, water bodies and other environmental features; • supports energy efficiency in building orientation; • creates a compact urban form that supports active travel, walkability and the use of public transport; 	Provides connectivity between new development and existing path networks and local destinations and activity centres.
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<p>Design and Layout</p> <p>PO 2.3 Land division maximises the number of allotments that face public open space and public streets.</p> <p>PO 2.4 Land division integrated with site features, adjacent land uses, the existing transport network and available infrastructure.</p> <p>PO 2.7 Land division results in street patterns that are legible and connected to the surrounding street network.</p> <p>PO 2.8 Land division is designed to allocate adequate and suitable land for the preservation of existing vegetation of value including native vegetation, regulated and significant trees.</p>	<p>Land division supports continuation of inter and intra-suburban cycleways and shared use paths between existing and new planned destinations such as activity centres, education facilities.</p>
<p>Roads and Access</p> <p>PO 3.2 Street patterns and intersections designed to enable the safe and efficient movement of pedestrian, cycle and vehicular traffic.</p> <p>PO 3.5 Road reserves provide for footpaths, cycle lanes and shared-use paths, and accommodate street tree planting, landscaping and street furniture.</p> <p>PO 3.8 Street patterns and intersections designed to enable the safe and efficient movement of pedestrian, cycle and vehicular traffic.</p> <p>PO 3.9 Roads, open space and thoroughfares provided establish safe and convenient linkages to the surrounding open space, activity centres and transport network.</p> <p>PO 3.10 Public streets include tree planting to provide shade and enhance the amenity of streetscapes.</p> <p>PO 3.11 Local streets designed to create low-speed environments that are safe for cyclists and pedestrians.</p>	<p>The Coalition strongly support all of these performance outcomes. There is some query over whether all town planners are adequately trained to interpret active transport networks at the land division stage.</p> <p>That is why the Coalition would like to see it made more explicit that planners check that existing surrounding cycleway and off-road networks are being continued; and that easy connections are being made to local destinations such as shops and schools and any new activity centre within a development.</p> <p>A common complaint is that new networks don't always connect to existing active travel networks or become difficult to navigate through open space. With an ageing population and a push to increase age-friendly housing planners need to consider networks for personal and motorised mobility devices, wheelchairs with appropriate connections to existing and potentially new destinations. Otherwise the opportunities provided by supportive housing will be lost.</p>

	<p>PO 3.9 could read <i>Roads, open space and thoroughfares provided establish safe and convenient linkages to the surrounding open space, activity centres, shops, education and transport network.</i></p>
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MAJOR LAND DIVISION (20+ ALLOTMENTS)

<p>Open Space</p> <p>PO 8.1 Land division allocates or retains, evenly distributed, high quality areas of open space to improve residential amenity and provide urban heat amelioration.</p> <p>PO 8.2 Land allocated for open space is suitable for intended active and passive recreational use considering gradient and potential for inundation.</p> <p>PO 8.3 Land allocated for active recreation is of a size and has dimensions capable of accommodating a range of active recreational activities.</p>	<p>The proposed performance outcomes meet Heart Foundation’s Healthy Active by Design principles including open space being evenly distributed, high quality, suitable and of a size for both active and passive recreation. The Coalition notes that no open space percentage is included in this section of the Code and queries whether this will be included in the next iteration.</p> <p>Open space should also be within easy walking distance of homes. Healthy Active by Design recommends the provision of large local parks (1 hectare minimum) within 500 metres safe walking distance from all dwellings, and small local parks within 150–300 metres safe walking distance of all dwellings. Other health-based guidelines also recommend that open space be within easy, safe, walking distance, usually defined as 400m.</p> <p>Open space in a major land division can also help provide greenways connecting destinations within and exterior to the land division. Although this is alluded to in Open Space and Recreation module, it is at land division stage when the placement of open space is often established.</p>
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Open Space and Recreation

<p>Desired Outcome (DO)</p> <p>DO 1 Pleasant, functional and accessible open space and recreation facilities provided for active and passive recreation.</p>	<p>Despite the desired outcome of ‘pleasant’ and ‘functional’ open spaces, there is little direction in this module on desired functions and amenity – perhaps this is not to presume where a piece of open space fits within a local government open space hierarchy and its overall purpose. A very brief section on ‘Design and Siting’ provides little for designers beyond ‘include park furniture’.</p> <p>The Coalition is concerned that with the current module, without any reference to other design guidance, may not deliver the spaces that promote health and wellbeing, urban cooling, active transport and biodiversity as envisaged by State Planning Policies and discussion papers.</p> <p>In the context of policy moves to higher density housing and a reduction in private open space, the amenity and range of activities offered in open space have become increasingly important to give residents and visitors attractive options for health promoting physical activity and social interaction. The perceived quality of open spaces has been shown to drive resident satisfaction in higher density developments.</p> <p>Health promoting guidelines ask developers and designers of open spaces to consider features that promote healthy lifestyles. These include grassed areas for informal sports, play equipment, adult exercise equipment, basketball rings, and dog exercise areas. This is because people, particularly children, are more active in parks that include facilities that enable active recreation (Healthy Active by Design). Aesthetic features and pleasant scenery and greenery increases the utilisation of open and green spaces for both active and passive recreation.</p> <p>Research based health promotion guidelines (Heart Foundation’s Healthy Active by Design and others) also call for the provision of infrastructure that supports use of the open space such as seating, shelter, shade, bins and water where appropriate. Some of these are alluded to in ‘Design and</p>
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	<p>Siting’ but missing some of the key qualities that have been shown to drive use of open spaces. For example; guidelines focused on healthy ageing emphasise at least some if not all of seating in open spaces should have backs and arms.</p> <p>Our suggestions include:</p> <ul style="list-style-type: none"> • DO 2 Open Space supports healthy lifestyles and opportunities for social interaction. • Other suggestions appear in relevant sections.
<p>Land Use and Intensity</p> <p>PO 1.1 Recreation facilities compatible with surrounding land use and activity.</p> <p>Design and Siting</p> <p>PO 2.1 Open space and recreation facilities address adjacent public roads to optimise pedestrian access and visibility.</p> <p>PO 2.2 Open space and recreation facilities incorporate park furniture, shaded areas and resting places to enhance pedestrian comfort.</p> <p>PO 2.3 Open space and recreation facilities link habitats, wildlife corridors and existing open spaces and recreation facilities.</p>	<p>PO 2.2 Open space and recreation facilities incorporate park furniture, shaded areas and resting places to enhance pedestrian comfort. <i>High amenity areas should be provided with seating designed for social interaction to encourage passive recreation.</i></p> <p>PO 2.3 should that be <i>Open space and recreation facilities link to habitats, wildlife corridors and other existing open spaces and recreation facilities?</i></p> <p>Suggested extra performance outcome: <i>PO 2.4 Subject to consideration of existing Council policies and uses of surrounding open space; larger open spaces should contain a range of facilities that promote physical activity and social contact such as</i></p> <ul style="list-style-type: none"> • <i>grassed areas for informal sports,</i> • <i>play equipment,</i> • <i>adult exercise equipment,</i> • <i>basketball rings,</i> • <i>dog exercise areas</i>
<p>Pedestrians and Cyclists</p> <p>PO 3.1 Open space incorporates: (a) pedestrian and cycle linkages to other open spaces, centres, schools and public transport nodes;</p>	<p>The Coalition welcomes the performance outcomes that provide direction to planners and designers to consider both the recreation facilities but also the connections to them. We would suggest including seating at regular intervals along pedestrian and cycle linkages to improve the pedestrian experience, particularly as the population ages. Suggested:</p>

<p>(b) safe crossing points where pedestrian routes intersect the road network; and (c) easily identified access points.</p>	<p><i>PO 3.1 (d) seating (including seating with backs and arms) at regular intervals alongside pedestrian and cycle linkages</i></p> <p>The provision of cycle parking at nodes such as playgrounds and active sport options alongside water fountains encourages access by active travel and use of the space. Suggested: <i>PO 3.1 (e) cycle parking provided at activity nodes within the open space alongside provision of drinking water</i></p>
<p>Safety and Security</p> <p>PO 5.1 Open space is overlooked by housing, commercial or other development to provide casual surveillance where possible.</p> <p>PO 5.2 Play equipment is located where it can be casually observed by nearby residents and users.</p> <p>PO 5.3 Landscaping provided in open space and recreation facilities maximises opportunities for casual surveillance throughout the park.</p> <p>PO 5.4 Fenced parks and playgrounds have more than one entrance or exit to minimise potential entrapment.</p> <p>PO 5.5 Adequate lighting provided around toilets, telephones, seating, litter bins, bicycle storage, car parks and other such facilities.</p> <p>PO 5.6 Pedestrian and bicycle movement after dark focused along clearly defined, adequately lit routes with observable entries and exits.</p>	<p>The Coalition supports all the proposed safety and security performance outcomes. The provision of seating co-located with play equipment and active sport options (tennis courts, basketball rings etc) allows for supervision by carers</p> <p><i>Addition to PO 5.2 Play equipment and active recreation options should have seating co-located to allow for supervision by carers</i></p>
<p>Signage</p> <p>PO 6.1 Signage provided at entrances to and within public open space to provide clear orientation to major points of interest such as the location of public toilets, telephones, safe routes, park activities and the like.</p>	<p>Signage should include whether the path is part of an overall walking/cycle network and show a reference point to within a broader network.</p>

<p>Landscaping</p> <p>PO 8.1 Open space and recreation facilities provide for the planting and retention of large trees and vegetation.</p> <p>PO 8.2 Landscaping in open space and recreation facilities provides shade and windbreaks:</p> <ul style="list-style-type: none"> (a) along cyclist and pedestrian routes (b) around picnic and barbecue areas; and (c) in car parking areas. <p>PO 8.3 Landscaping in open space facilitates habitat for local fauna and facilitates biodiversity.</p>	<p>There appears to be no requirement for grassed areas for jogging, kicking balls. Although the use of potable water may be of concern, some soft landscaping suitable for active recreation would be appropriate at most medium to larger parks.</p> <p><i>Suggested PO 8.4 Open space should provide portions of soft landscaping to allow for informal sports and recreation.</i></p>
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Transport, Access and Parking

<p>Desired Outcomes (DO) DO 1 A comprehensive, integrated and connected transport system that is safe, sustainable, efficient, convenient and accessible to all users.</p> <p>Movement Systems PO 1.1 Development integrated with the existing transport system and designed to minimise its potential impact on the functional performance of the transport system.</p> <p>Sightlines PO 2.1 Maintenance or enhancement of sightlines at intersections, pedestrian and cycle crossings, and crossovers to allotments for motorists, cyclists and pedestrians to ensure safety for all road users and pedestrians. PO 2.2 Walls, fencing and landscaping adjacent to driveways and corner sites are designed to provide adequate sightlines between vehicles and pedestrians.</p> <p>Access for People with Disabilities PO 4.1 Development sited and designed to provide safe, dignified and convenient access for people with a disability.</p>	<p>The Coalition would like to see the provision of active transport networks made more explicit in this general development policy as walking and cycling may not be front of mind when a planner considers ‘the existing transport system’.</p> <p>Suggested. PO1.2 (or as a desired outcome) <i>provision of fully connected pedestrian and bicycle networks including well designed crossing facilities and separated bicycle lanes in accordance with design standards. Safe, separated and high-quality pedestrian bicycle networks will encourage non-vehicular access to homes and services, reduce emissions and promote healthy lifestyles.</i></p> <p>Suggested amendments PO 2.1 and 2.2 <i>PO 2.1 Maintenance or enhancement of sightlines at intersections, pedestrian and bicycle crossings, and crossovers to allotments for motorists, cyclists and pedestrians to ensure safety for all road users.</i></p> <p><i>PO 2.2 Walls, fencing and landscaping adjacent to driveways and corner sites are designed in accordance with the Australian Standard to provide adequate sightlines between vehicles, pedestrians and bicycle riders when they are using the footpath.</i></p> <p>PO2.3 Ensure there is provision for access to public transport corridors by walking or cycling or other personal transport modes to encourage use and reduce reliance on private vehicle use</p>
<p>Bicycle Parking in Designated Areas</p> <p>PO 9.1 The provision of adequately sized on-site bicycle parking facilities to encourage cycling as an active transport mode supporting community health.</p>	<p>The Coalition supports the current draft Code clauses on Bicycle Parking.</p>

DTS/DPF 9.1 Areas and / or fixtures are provided for the parking and storage of bicycles at a rate not less than the amount calculated using Transport, Access and Parking Table 3 - Off Street Bicycle Parking Requirements.

PO 9.2 Bicycle parking facilities provide for the secure storage and tethering of bicycles in a place where casual surveillance is possible, is well lit and signed for the safety and convenience of cyclists and to deter property theft.

PO 9.3 Non-residential development incorporates end-of-journey facilities for employees such as showers, changing facilities and secure lockers, and signage indicating the location of the facilities to encourage cycling as a mode of journey-to-work transport.