
From: Grant Wooller [REDACTED]
Sent: Friday, 21 September 2018 5:00 PM
To: DPTI:Planning Engagement
Subject: Vision for South Australia's planning system: State Planning Policies - Submission -
Attn: Sarah Elding

Dear Ms Elding,

It is with much interest and anticipation that we have read the Draft State Planning Policies for South Australia (July – September 2018). Firstly, and big congratulations to the team that has brought the massive effort and body of work together, for what is overall a very good document.

We have particular interest in Design Quality Policy, and how Universal Design has been incorporated into this policy; in particular how the following clauses of the PDI Act have been addressed within the State Planning Policy:

- 12(2)(d) promote high standards for the built environment through an emphasis on design quality in policies, processes and practices, including by providing for policies and principles that support or promote universal design for the benefit of people with differing needs and capabilities
- 14(c)(iv) built form and the public realm should be designed to be inclusive and accessible to people with differing needs and capabilities (including through serious consideration of universal design practices)
- 59(2) The design quality policy must include specific policies and principles with respect to the universal design of buildings and places to promote best practice in access and inclusion planning.

As the largest specialist organization in the field, Architecture & Access consult to create accessible, safe and functional environments that transform lives. We are very passionate in the area of accessibility for all people, and the implementation of Universal Design.

In relation to the Draft State Planning Policies for South Australia (July – September 2018) open for consultation, we have the following specific feedback:

1. **Part 3: Principles of Good Planning**

- The inclusion of universal design within the subpoints under “high-quality design principles” is good. It would be preferable to see wording such as “including through the implementation of universal design practices” rather than current wording of “ through the serious consideration of universal design practices”, but we do understand that this has come from the wording within the Act itself.

2. **State Planning Policy 2: Design Quality**

- Policy 2 (page 25) states “Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of Universal Design, Access for All, Crime Prevention Through Environmental Design, Environmentally Sustainable Design and Water Sensitive Urban Design”. Whilst all principles of good design, and there may be some overlap, they do not all relate directly to access and inclusion. I would suggest that this item be split into two policy items; access and inclusion relating to the Principles of Universal Design and Access for All, and another relating to safe and sustainable design. I believe splitting the items out

will better achieve Clause 59(2) of the PDI Act which requires specific policies and principles with respect to universal design.

- I also believe the policy does not include enough specifics in relation to principles to achieve universal design, and thereby meet 59(2) of the Act. Universal Design has only been mentioned within the policies, but with no further guidance or principles. Universal Design may mean different things to different people, so for clarity of the policy and for when it comes to assessment against the policy, I would suggest that additional definition be incorporated into the policy, even if as a Guidance Note. This could include:
 - i. Definition: Universal Design is the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design (Ron Mace)
 - ii. Principles of Universal Design, which include Equitable Use, Flexibility in Use, Simple and Intuitive Use, Perceptible Information, tolerance for Error, Low Physical Effort, Size and Space for Approach (*1997 NC State University, The Center for Universal Design*)
 - iii. Goals of Universal Design: The principles have been developed into eight goals which are body fit, comfort, awareness, understanding, health & wellness, social integration, personalisation and cultural appropriateness. (Steinfeld and Maisel, 2012)
- Policy 4 (p25) states “Ensure design advice is considered early in the planning process for complex developments...” We would argue that this should occur for all developments, complex or not. Time and time again we see projects, even small seemingly straight-forward developments where access and inclusion has not been considered until the design is developed and substantially documented (if not already under construction). In these cases accessibility (let alone universal design) has not been able to be achieved to the extent required, and/or poor quality design outcomes achieved, and money wasted to redesign and/or rectification during construction (or non-compliant results). We would advocate this needs to be considered early in all projects to achieve quality design.
- “Non-statutory Guidance Notes – The Planning and Design Code” (p25) states “the Code must also include performance outcomes and design solutions that are based on the Principles of Good Design”. We would like to see this include outcomes specifically relating to the principles and goals of Universal Design. This would be another way that the PDI Act 59(2) requirements can be implemented.

3. Glossary

- The glossary (pp 66 - 68) should include definition of Universal Design.

Thank you for the opportunity to provide feedback on this valuable and significant document. We look forward to the outcomes of this consultation, and if we can be of further assistance, please do not hesitate to contact.

Kind Regards,

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