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State Planning Commission
GPO Box 1815
Adelaide SA 5001

Feedback on Final Draft Design Standard 1: Engineering Requirements for Land Division (Stage 2 Consultation)

The Australian Institute of Architects welcomes the opportunity to provide feedback on the final draft Design Standard 1 – Engineering Requirements for Land Division and associated amendments.

The Institute supports the objective of improving consistency, transparency and efficiency in land division assessment, and recognises the need for planning and infrastructure settings that support housing delivery. However, streamlined assessment should not come at the expense of long-term design quality, climate resilience, public realm performance or liveability outcomes.

Poorly resolved subdivision outcomes can also create long-term public health, infrastructure maintenance and climate adaptation costs that are difficult and expensive to retrofit over time.

The Institute considers housing delivery and climate-responsive, high-quality place outcomes to be complementary objectives, not competing ones.

Design Standards under the Planning and Design Code are intended to support integrated public realm and infrastructure outcomes. The final Design Standard should therefore embed, not dilute, performance outcomes central to climate adaptation, urban greening and liveable neighbourhood design. This approach is also consistent with broader international planning and climate adaptation trends, which increasingly integrate climate resilience, green infrastructure and active movement networks into statutory planning and infrastructure frameworks.

1. Climate resilience and active transport should remain core performance requirements

The Institute is concerned by the relocation of climate resilience and active transport provisions from the Design Standard into the Technical Manual.

These matters should not be treated as guidance-only considerations. They are core performance issues with material implications for public safety, infrastructure resilience, urban heat mitigation and long-term liveability.

The Institute is concerned that relocating climate resilience matters from the Design Standard to supporting guidance risks weakening their regulatory status, contrary to broader state policy directions seeking stronger, not lesser, responses to climate risk.



The evidence base supports stronger treatment. The Urban Greening Strategy for Metropolitan Adelaide identifies that 74 per cent of metropolitan suburbs have less than 20 per cent tree canopy cover, urban heat intensity has increased, and Adelaide faces the highest projected increase in heatwave-related mortality risk among major Australian cities. It also establishes reducing urban heat as a formal performance investigation area.

Given these risks, the Institute recommends the Design Standard explicitly retain performance requirements relating to:

- urban heat mitigation
- connected, safe and legible active movement networks, including walking and cycling routes integrated with street design, shading and public realm outcomes
- water-sensitive urban design (WSUD)
- shade and cooling outcomes in streets and public realm
- climate-responsive subdivision design.

Detailed specifications may sit within the Technical Manual, but the obligation to achieve these outcomes should remain embedded in the Design Standard itself.

2. Urban canopy and public realm should be recognised as core infrastructure outcomes

Street trees, urban canopy and associated green infrastructure should be treated as core infrastructure systems, not discretionary amenity.

They contribute measurable performance outcomes relating to:

- urban cooling and heat mitigation
- stormwater management and integrated green infrastructure and WSUD systems
- biodiversity support
- active movement comfort and walkability
- neighbourhood liveability and community wellbeing.

This aligns with the purpose of Design Standards to support integrated infrastructure and high-quality public realm outcomes.

The Institute notes:

- the Urban Greening Strategy establishes a 30 per cent metropolitan canopy target and measurable performance focus on reduced urban heat
- 74 per cent of suburbs remain below 20 per cent canopy cover
- the Greater Adelaide Regional Plan supports integrated urban greening and climate-responsive neighbourhood planning.



The final Design Standard should support, and not undermine, those policy settings.

Stronger urban greening and canopy outcomes are also consistent with Australia's broader biodiversity commitments, including the Kunming–Montreal Global Biodiversity Framework.

The Institute recommends the Design Standard incorporate measurable performance benchmarks supporting:

- canopy outcomes aligned with the 30 per cent metropolitan tree canopy target
- minimum deep soil and permeable surface conditions to support viable tree growth
- integrated tree establishment and WSUD responses
- minimum shade performance along streets and active transport corridors
- retention-first approaches to mature trees
- prioritising retention of existing canopy alongside new planting outcomes.

These are not discretionary enhancements; they are evidence-based resilience measures.

3. Critical climate and public realm outcomes should not be deferred through streamlining

The Institute supports efficient assessment pathways but emphasises that subdivision-stage decisions shape long-term place outcomes and should not be treated as matters capable of being fully recovered later through conditions or downstream engineering resolution.

Street layout, soil conditions, tree establishment opportunities, permeability, active movement networks and integrated water management are often determined at this stage and can become effectively locked in. This includes the alignment and continuity of walking and cycling networks, which, if not resolved at subdivision stage, are difficult to retrofit and can undermine long-term accessibility and mode shift objectives. The structure and connectivity of street networks also influence the feasibility of efficient public transport services, including bus routes.

Mandatory conditions proposed as part of this reform package should not substitute for clear, embedded performance requirements in the Design Standard itself.

The Institute therefore recommends matters affecting streetscape, trees, active movement and climate resilience be addressed at the land division stage through explicit performance requirements, rather than deferred primarily through mandatory conditions proposed as part of this reform package or later engineering resolution.

Deferral risks inconsistent outcomes and can weaken the delivery of objectives that may be difficult or impossible to recover later, particularly deep soil conditions, tree establishment opportunities, integrated movement networks and permeability outcomes.

This is particularly important because mature canopy loss and increased imperviousness are cumulative and often irreversible. The Urban Greening Strategy notes tree canopy loss on residential land remains



significant and that replacing mature trees does not offset the decades required for equivalent environmental performance.

4. Urban heat mitigation should be recognised as an assessment outcome

The Institute recommends the Design Standard explicitly require urban heat mitigation outcomes to be addressed through integrated responses involving:

- canopy and shade provision, particularly along pedestrian and cycling routes
- surface permeability
- water-sensitive urban design
- reduced heat-absorbing hardscape where feasible
- coordinated public realm cooling strategies.

This would align the Design Standard more closely with South Australia's broader climate adaptation and urban greening policy settings.

5. Integrated water-sensitive urban design should be strengthened

The Institute recommends stronger recognition that urban greening outcomes depend on soil, permeability and water availability, and that canopy performance should not be treated separately from water-sensitive urban design.

The Urban Greening Strategy identifies WSUD as essential to future-proofing Adelaide's urban forest and calls for it to become 'business as usual'.

The final Design Standard should reinforce integrated green infrastructure and WSUD systems as linked infrastructure systems, not parallel considerations.

6. Policy alignment

The Institute recommends the final Design Standard expressly support alignment with adopted or emerging strategic policy settings, including:

- Greater Adelaide Regional Plan
- Urban Greening Strategy for Metropolitan Adelaide
- broader state policy directions supporting climate resilience, liveability and integrated neighbourhood outcomes.

This will help avoid inconsistency between subdivision engineering settings and broader planning and resilience objectives.



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Conclusion

The Institute supports the intent of Design Standard 1 and recognises its potential to improve consistency and support housing delivery.

However, the Institute strongly recommends that climate resilience, active transport, urban heat mitigation and urban greening retain clear status as core performance matters within the Design Standard itself, supported, but not replaced, by the Technical Manual.

Housing supply and streamlined assessment can and should be advanced alongside measurable resilience outcomes, public realm quality and climate-responsive development.

Yours sincerely,

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Prepared with support from the South Australian Chapter Council and leadership team.