

DTI:Planning Review

From: [REDACTED]
Sent: Wednesday, 23 November 2022 5:46 PM
To: DTI:Planning Review
Subject: Submission to Planning System Implementation Review

Thank you for the opportunity to make a submission to the System Planning Implementation Review. In this submission I would like to comment on the following matters:

- Tree protection
- Energy efficient buildings
- Carbon neutral development
- Transport oriented development
- Urban density

Tree protection

I strongly support the Conservation Council of SA's call to significantly improve planning laws to protect trees. I urge the review to adopt the council's recommendations for reforms as outlined in their A Call to Action report (https://www.conservation.sa.gov.au/tree_resources)

I was stunned to discover that we have the weakest urban tree protection of laws in the country. To improve the liveability of our cities, address climate change, reduce heat islands and improve habitat, we need to significantly increase our tree canopy - though current planning laws are driving significant tree loss.

One specific matter I would like the review to address is the misguided belief that tree removal is desirable in hills areas from a bushfire prevention perspective. My understanding is that large trees provide a significant benefit in preventing the spread and impact of bushfires.

Energy efficiency of buildings

I am pleased to read that South Australia will adopt the 7 star standard for new homes. I am concerned, though, that there are moves to delay the introduction of this here. This means we are delaying the benefits that these improvements will provide. I would urge the review to recommend the immediate adoption of the 7 star standard.

I am also aware that the benefits of these standards are lost when there is poor compliance with the requirements during the construction phase. This presents a cost to the residents of the dwelling, in the form of higher energy costs and reduced comfort. I urge the review to recommend compliance checks for all new dwellings prior to occupancy. To be meaningful, these should include a blower-door test and thermal imaging (<https://www.energy.gov/energysaver/blower-door-tests>)

Carbon neutral developments

With South Australia's rapid progress towards a 100% renewable electricity grid, there is a growing body of evidence that domestic and small business energy users should be moving away from gas as a fuel source. The reasons for this are:

- Gas is a fossil fuel with significant climate change impacts, both associated with its combustion and also fugitive emissions
- My understanding is that there are technical and economic barriers to transitioning the current natural gas network to green hydrogen. The current Tonsley trial involves injecting 5-10% hydrogen into the network. There is an upper limit to how much hydrogen can be put into the network (I believe this is around 20-30%) before the burners on appliances need to be changed. The cost of such a change across all end-user appliances is likely to be prohibitive.
- Electric appliances (such as reverse cycle air conditioners, heat pump water heaters and induction cookers) cost less to run than their gas appliance counterparts

- Users moving from two fuels (electricity and gas) to one (electricity) reduces energy costs to end users, as they don't have to pay the gas supply charge.

The ACT recognises these factors in its pathway to electrification (<https://energy.act.gov.au/>) that will see new gas connections prevented from 2023.

I would urge the review to recommend:

- no gas connections for new developments, including new multi-occupant developments
- setting a timeline for no new gas connections in existing developed sites
- policies to support households and small businesses transition to electric appliances when appliances are replaced.

Transport oriented development

The Adelaide metropolitan area has been developed with little consideration to the interaction between developments and public transport. The recent development at Bowden provides a rare example where public transport has been well integrated. Whilst this is encouraging, it is an inner urban development, where people can walk and cycle as easily as catching the tram or train. Similar transport interconnectedness is needed for all developments. Without this, people who live and visit these areas will face higher transport costs and associated emissions.

Urban Density

Related to the previous comment is a need for increased urban density. This will avoid the need for urban sprawl and make public transport more viable. Adelaide has a history of low density development, so such moves to increased density will require sensitive community engagement. Also the benefits of increased density, such as at Bowden and Tonsley can provide a positive model for change.

Yours sincerely,

