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Government of South Australia

Premier's Climate Change Council

Mr Michael Lennon
Chair, State Planning Commission
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Dear Mr Lennon

I am writing on behalf of the Premier's Climate Change Council (the Council) in response to the State Planning Commission's consultation on Phase Two of the Draft Planning and Design Code.

The Council is established under South Australia's *Climate Change and Greenhouse Emissions Reduction Act 2007* and is the State Government's key advisory body on matters associated with reducing greenhouse gas emissions and adapting to climate change. The Council is pleased to offer its comments to inform the development of the Rural Areas Planning and Design Code (the Code).

The Council has previously identified the importance of considering climate change in land use planning. The Code must articulate the need for climate resilience in all forms of development including consideration of what, where and how we build to adequately mitigate future climate impacts and reduce carbon emissions.

South Australia is already experiencing the impacts of climate change. As these impacts are projected to intensify in the future, an increase in scale and ambition of action is required. Enhanced responses are needed to build the resilience of our natural systems, communities and economy. The Council suggests that further opportunities for generation 1 reforms to better protect and reduce the loss of natural climate systems, biodiversity and tree canopy should be explored.

It is encouraging and fitting that climate change is considered as a mandatory policy element of the planning system (State Planning Policy 5). However, as development can only be assessed against the Code it is vitally important that climate change mitigation and adaptation requirements are explicit throughout the Code itself. While it is important that further work to build data and improve hazard mapping is fast tracked, it is also important for existing data and knowledge about climate risks to be incorporated into the Code at the earliest opportunity to provide broad and long-term benefits. An ongoing commitment to incorporate improved and updated data in to the Code should also be a future priority.

The Council acknowledges that the Phase Two draft Code includes progressive approaches to mitigating climate impacts, particularly in relation to greening and water sensitive urban design. The importance of maintaining and building upon these improvements in future iterations of the Code is emphasised. Overall, it is advised that climate considerations still need to be better articulated and more consistently applied throughout the Code. Importantly, the Council notes that the words 'climate change' are not specifically referenced in this version of the draft Code, which is a significant omission.

State Planning Policy 5 reflects the important role of planning in identifying land that is prone to hazards, both now and in the future as a result of climate change, and promoting development that

is resilient to climate impacts and reduces risk. While there are references to current and future hazards in coastal environments, this should be replicated for all other hazards in the Code.

The Council advises that it will be difficult for the objective of the climate change policy to be achieved without inclusion of clear requirements in the Code for land use planners and developers to seriously consider climate change issues and ensure that all natural hazard risks to personal and public safety and property are considered. It is suggested that reinstating the performance outcomes included in the Phase One draft relating to environmental protection (including native vegetation and water management) and hazard risk minimisation, with the additional reference to future hazards under a changing climate, could remedy this. While many issues could be managed through the overlays, the existing limitations associated with the flood overlays in particular, requires specific reference to future hazards and hazard risk minimisation at least until the point where all flood hazard mapping is updated to a consistent level.

Climate risks are projected to increase in the future. While many performance outcomes relating to design in urban areas will contribute to addressing climate risks and building resilience, a whole of life design approach which requires the consideration of future climate conditions, is recommended.

In previous submissions, the Council has advocated for the adoption of a risk based approach to hazard management. While the current draft Code does not seem to adopt this approach, it is suggested that later iterations of the Code could be strengthened by moving towards this.

At the joint meeting between the Council and the State Planning Commission which took place on 5 September 2019, key items were identified for further joint action, including: infill policy reform; water sensitive urban design; urban greening; energy efficiency; low emission transport; and incorporation of better hazard data and planning responses (including future hazard risks under a changing climate). The Council is keen to continue this relationship, working with the Commission to progress action in the Generation 1 reforms and identify further opportunities for Generation 2 reform. The Council encourages and will continue to support the Commission in its efforts to build support for further planning reforms including implementation of stronger adaptation and mitigation measures in the future.

The Council appreciates the opportunity to provide input to this consultation. We welcome discussion on any aspect of this submission.

Yours sincerely



Martin Haese
Chair
Premier's Climate Change Council