



15 December 2022

Attn: Expert Panel
John Stimson
Presiding Member, Planning System Implementation Review
Planning and Land Use Services Division
GPO Box 1815 Adelaide SA 5001
By email: dti.planningreview@sa.gov.au

Dear Mr Stimson

Re: Resilient Hills & Coasts Submission on the 2022 Planning System Implementation Review

Resilient Hills & Coasts is one of eleven Regional Climate Partnerships across the State, established from 2014 as part of the South Australian Government's push to prepare our communities for a changing climate. Our region covers the Adelaide Hills, Fleurieu Peninsula and Kangaroo Island. We are a partnership between six Councils (Adelaide Hills, Alexandrina, Kangaroo Island, Mount Barker, Victor Harbor and Yankalilla), the Southern & Hills Local Government Association, two Landscape SA Boards (Hills and Fleurieu and Kangaroo Island), Regional Development Australia Adelaide Hills, Fleurieu and Kangaroo Island, and the Department for Environment and Water.

The International Panel on Climate Change's (IPCC) Sixth Assessment Report, and the recent COP27 meeting in Sharm El-Sheikh, have one conclusion: climate change is unequivocally here now, and will get worse in the years and decades to come. There is now global political and community agreement that climate action is required urgently, on all fronts, by everyone.

As a partnership, our goal is to strengthen the climate resilience of our communities, economies and natural and built environments. To build resilient communities, we must integrate climate-readiness into all aspects of where we build and what we build. Climate ready development will minimise community vulnerability during extreme events, while providing improved liveability, affordability and health and wellbeing for households every day.

Our region has, just in the last three years, faced intense bushfires, heatwaves and floods. We are therefore intensely aware that development must support a hotter, drier climate, and mitigate risks and liabilities from more intense and frequent hazards like extreme heat, bushfires, coastal erosion and flooding. There is a growing body of evidence that climate resilient housing raises quality of life for inhabitants while lowering the cost of living. For example, a 2020 study of our regional housing stock showed that immediately retrofitting the 3,000 climate-vulnerable homes in the Adelaide Hills and Fleurieu Peninsula region to a climate-ready standard would deliver \$72 million in net benefits.

We are also facing the same challenges as metropolitan Adelaide regarding urban tree loss and the heat island effect. A 2022 tree study in the City of Alexandrina showed that even if Council increased canopy cover by 30% on Council land in townships, a 1% reduction in canopy on private land would wipe out all those gains. Protection of existing trees on private land is therefore critical.

The State Planning Policies provide clear objectives for development to respond to climate change, but this is not yet well-translated into policy and planning instruments, making it impossible for the planning system to deliver on these strategic objectives. We need specific, practical policy amendments – some are proposed below.

1. **High Performing Homes:** We propose that an Environmentally Sustainable Development (ESD) performance-based assessment tool be introduced to the Code as a deemed-to-satisfy provision, requiring all development to quantifiably demonstrate sustainability and climate resilience outcomes. This would bring South Australia into line with other states, such as Victoria with the Built Environment Sustainability Scorecard (BESS) and Residential Energy Efficiency Scorecard, and New South Wales with BASIX (Building Sustainability Index). Renewal SA has used a similar approach to achieve sustainable housing in some of its developments.
2. **Cooler Neighbourhoods:** We propose that an Urban Heat Hazard Overlay be added to the Code, with accompanying heat mitigation policies, requiring developments to demonstrate how they would mitigate any heat island effect. Two potential approaches are: a Cool Materials Policy (eg. light-coloured roofs policy); or integrating a Cool Suburbs approach into the aforementioned ESD performance-based assessment tool (eg. Western Sydney Cooler Suburbs Tool). Metropolitan Adelaide has a resourced plan to capture urban heat data that would inform such an approach – other urban areas (including growth areas like Mount Barker, Victor Harbor and Goolwa) should too.
3. **Greener Neighbourhoods:** To arrest and reverse tree canopy decline: tree protections in our *Planning, Development and Infrastructure Act 2016*, Regulations and Planning and Design Code must be strengthened; and we need to regulate the positioning of underground services to create more space for trees. As a minimum, tree rules should include a substantial reduction in the trunk circumference that triggers protection. All trees should be protected, regardless of species, unless they are invasive – tree protection species list should therefore be abolished, and a list of exempt invasive species included (eg. by including an exemption for plants declared under the *Landscape South Australia Act 2019*).
4. **Resilient Coastal and Riverine Development:** The current floods in our region have brought home the need to build for future inundation levels, both along rivers and the coast. We ask the State Government to implement coastal legislation reforms to better interact with the *Planning, Development and Infrastructure Act 2016* and others, and to use the latest statewide coastal modelling to trigger and inform coastal planning policies (eg. through a refined Coastal Hazard Overlay). A trigger similar to the 1956 Flood Zone along the River Murray could be extended to other flood zones to restrict development in areas subject to flooding.

We want to see a planning system that goes as far as reasonably practicable to encourage climate-ready, resilient communities. Thank you for the opportunity to comment on this review.

This submission was prepared by the Resilient Hills & Coasts Steering Committee and due to time constraints has not been presented to or endorsed by the elected bodies of member Councils. As such this submission does not replace or constitute individual partner submissions.

Regards,

Jen St Jack

Resilient Hills & Coasts Regional Coordinator

On behalf of the Resilient Hills & Coasts Steering Committee