



15 December 2022

Mr John Stimson
Presiding Member, Expert Panel
Planning System Implementation Review

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Dear Mr Stimson

The SA Fire and Emergency Services Commission (SAFECOM) operates under the *Fire and Emergency Services Act 2005* and provides strategic leadership in whole-of-government emergency management at a state and national level. Our purpose is to create a safer community by providing a unified strategic direction to the emergency services sector for service delivery, governance and accountability.

SAFECOM appreciates the opportunity to provide input to the Planning System Implementation Review, with a view to supporting more liveable, competitive and sustainable long-term growth for Greater Adelaide and the regions.

We know that disasters are becoming more frequent, complex, unpredictable, and difficult to manage and that we are likely to see more compounding and cascading disasters on a national scale. These factors are already stretching the capacity and capability of our emergency services sector both within and outside of South Australia.

The estimated cost of natural disasters facing current and future generations of Australians are also rising. The 2021 Deloitte [Update to the economic costs of natural disasters in Australia](#) Report, estimates that natural disasters will cost Australia at least \$73 billion per year by 2060, under a low emissions scenario. This is significantly higher than the \$39 billion by 2050 estimated in their 2017 Report.

In its Report, the [Royal Commission into National Natural Disaster Arrangements](#) states that 'The extent of damage and harm caused by natural disasters depends not only on the intensity of the hazard itself, but also on a range of other factors, such as where people choose to live, how they build their homes, how public and private land is managed, and how well people and communities are prepared, supported and cared for during and after disasters'.

Land-use planning directs how land can be used, where infrastructure and built assets can be located, and how it is designed. It is, therefore, the primary mechanism the government can use to manage and minimise exposure to hazards.

The recent state planning reforms have delivered some progress in relation to disaster risk reduction. However, as land-use planning decisions have long-lasting and far-reaching consequences, SAFECOM suggests that an important focus of this review should be to assess what more could be done to enable the planning system to better consider a range of matters relating to emergency management and service provision across the prevention, preparedness, response and recovery spectrum.

Planning controls could better reflect the growing impact of climate change on the natural environment and communities including adopting appropriate resilience

measures for all future development including urban infill. In particular, an overarching intent to 'minimise more people and things being placed in harm's way' should be adopted across the planning system.

The Australian Institute for Disaster Resilience, *Land Use Planning for Disaster Resilient Communities handbook*, considers natural hazard risk as the single most important mitigation measure in minimising the increase in future disaster losses in areas of new development. The pressure for more housing is increasing, which in turn increases the temptation to encroach on areas prone to hazard risk.

Improvements in this area could include adopting policies that discourage major improvements or redevelopment in areas or properties located in high-risk areas (unless improvements mitigate hazard risks). This may include implementing or strengthening the requirements for hazard risk analysis of all master planned or greenfield areas.

The planning system review is an opportunity to advocate, implement and promote improved building quality and standards at the state and national level, instilling resilience into building codes to mitigate risks. This includes adopting improved build back better principles for hazard impacted and high-risk communities.

The need to continue to develop and utilise the best possible information (i.e. data, mapping, projections) is also emphasised. This includes adopting further measures to promote a better understanding of the increasing frequency, likely location and severity of future disasters and clearly highlighting areas where data is missing to ensure that non-mapped areas are not considered the same as or confused with known low-risk areas. The updated Department for Environment and Water's *Guide to climate projections for risk assessment and planning in South Australia 2022* should be utilised as a key tool to inform future planning that accounts for climate related variables under different greenhouse gas emission scenarios.

The SASES has produced a *Land Development Policy Extreme Weather and Floods* which includes a number of policy principles and statements relating to land-use planning and extreme weather and floods for organisations that have responsibilities for land use planning and building design and construction. This policy emphasises and builds upon a number of the points raised in this submission.

If you would like to discuss any aspect of this submission in further detail, please contact Nicole Westbury, Senior Policy Officer on [REDACTED] or email [REDACTED]

Warm regards

[REDACTED]

Julia Waddington-Powell
Chief Executive
SA Fire & Emergency Services Commission