

28 February 2020

Mr Michael Lennon
Chair
State Planning Commission
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ADELAIDE SA 5000



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Dear Mr Lennon,

I write in response to the Commission's consultation on Phase 3 of the planning reforms implementation, related to urban council areas and councils with regional towns and cities.

Business SA, South Australia's Chamber of Commerce and Industry, was formed in 1839 and has more than 3,000 members across every industry sector, from micro businesses through to listed companies. We are a not-for-profit business membership organisation which works on behalf of members and the broader business community in pursuit of economic prosperity for both South Australia and the nation. Funded by member subscriptions and our products and services, we are independent of any government or political party.

Business SA's involvement with the planning reform process to date has occurred primarily during phases of consultation on more strategic policy level issues, rather than at a technical planning policy level. We were represented on the previous Government's Planning Reform Reference Group and made several submissions during 2014 to the Expert Panel's process ahead of the planning reform Bill being introduced to Parliament in 2015. The essence of our previous feedback was on ensuring the planning system was structured to facilitate sustainable economic growth across a range of industry sectors while concurrently reducing the cost of doing business in South Australia, including through a move to e-planning.

In relation to the current round of consultation, we have a particular interest in two key areas as they relate to broader policy matters concerning the business community, climate change and water security.

In consultation with our members, we make the following comments and observations on both:

Water Tank requirements

- At a high level, Business SA supports a continued focus on water conservation in South Australia. While South Australia now has a 100 GL de-salination plant, the marginal price of that water is higher than from other sources and from a broader price-of-water perspective, Business SA has been mindful that the de-salination plant only operates when required or when used within a strategy to provide for another economic benefit **such as maintaining local irrigators' water allocations. Otherwise, the reality is** that all South Australian water users, including businesses, will pay a higher per kilo litre unit price for water which has a disproportionate impost on water intensive industries, particularly those in export orientated sectors such as food and beverage manufacturing and agri-business.

In relation to the planning reform implementation though, there seems to be competing policy drivers for enhanced requirements on developers to provide an increased level of rainwater catchment through tanks. On one hand, the primary driver from a practical sense is the management of storm water when developers are subdividing blocks. Water re-use is also mentioned, but at the time the current requirements were originally introduced in 2006, South Australia was staring down the barrel of a water security crisis.



If the Government is clear on what the policy drivers are for current or enhanced rainwater tank requirements, then Business SA would only ask the question as to whether the requirements for each allotment size will make a sufficient difference. For example, from a water conservation perspective, small allotments of say, under 200sqm, only have a small garden area to maintain even if toilet flushing or washing machine use is less influenced by block size. This dynamic of course changes as the size of the block increases.

- Developers are already pressed in meeting various requirements on small allotments, particularly less than 200sqm. This relates to typical needs such as bin storage, air-conditioning units, clotheslines and the like. Consequently, planning policies which otherwise have an overarching objective of encouraging urban infill need to be structured to adequately accommodate what developers realistically need to offer the owners or tenants which are likely to occupy these inner city infill dwellings.

Urban Tree Canopy requirements

- Business SA supports the intent of the planning reforms to provide for greater urban tree canopy cover. This will make Adelaide a more livable city and there is a body of evidence to quantify the benefits of green spaces for health and wellbeing.

What we would like to see though is a more sophisticated level of benchmarking the approach to achieving greater urban tree canopy that is measurable across jurisdictions. This would be best undertaken by a national authority such as the Bureau of Meteorology which could construct an agreed approach to measuring and tracking urban heat changes and relativity when comparing areas of varying tree canopy cover and other green space. In that way, Governments would be better placed to understand at a more granular level what they need to do to improve urban tree canopy cover and how to measure the success or otherwise of various policies aimed at achieving that goal.

- In implementing the proposed changes, it is noted that there could be an additional cost to developers on the basis of increased risk that tree planting requirements on small blocks could impact upon building footings. Business SA is not in a position to comment on exactly how much each building allotment requirement will influence that cost, and we are not arguing that it be a determining factor for enhanced tree canopy requirements, but the practicalities should be borne in mind.
- Several developers have provided feedback to Business SA about the inconsistency between Councils around the ability to replace trees on verges to enable developments. As part of the proposed tree canopy cover changes, we encourage the Commission to look at how verges can be used in a more flexible manner to achieve a similar outcome in terms of total tree canopy cover. For example, Councils allowing developers to replace one tree with two on the verge, providing of course that trees of significance are not impacted. If Councils can play a role in being more flexible, similarly to what developers will have to be to meet the new **planning requirements, then both sides should be able to reach the Government's desired tree canopy cover outcome at least cost.**
- The maintenance of trees will also be important to ensure the intended policy outcome of the new tree canopy cover requirements are met. The desired tree canopy growth will only incur if those trees are properly nurtured as they become established. The Commission should also have regard for how developers might practically meet new requirements in so far as which variety of trees are likely to be selected.

Business SA encourages the Commission to carefully consider the optimum approach to achieving the policy intent of the planning reforms. If additional costs are imposed on developers, which we appreciate may be necessary, the Commission should consider how it can measure the greater benefit to the environment from the new requirements in relation to tree canopies and water tanks.

If you would like to discuss this submission further, please contact Andrew McKenna, Director Policy and Advocacy on [REDACTED] or [REDACTED]

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Martin Haese". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Martin Haese
Chief Executive Officer