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Government of South Australia
Premier's Climate Change Council

Ms Alison Collins
Project Lead People and Neighbourhoods Discussion Paper
Department of Planning, Transport and Infrastructure
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Dear Ms Collins

I am writing on behalf of the Premier's Climate Change Council (the Council) in response to the State Planning Commission's consultation on the Planning and Design Code: People and Neighbourhoods discussion paper.

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 comments to inform the development of the Planning and Design Code (the Code).

General Comments

The Council has previously identified the importance of adequately considering climate change in land use planning. Once in place, the Code will be an incredibly important factor in our state's ability to respond and adapt to climate change. Therefore, it must clearly 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, to reduce new carbon emissions and improve the long term affordability and liveability of our homes and suburbs.

This includes ensuring that the best available information (e.g. climate change projections) is used to inform decision making and that a commitment is made to reviewing and updating information regularly.

The Council considered that this discussion paper provided a good overview of the rising impacts of climate change. The Council strongly supports the progressive approaches to mitigating climate impacts, particularly in relation to tree planting and landscaping to reduce the heat island effect, water sensitive urban design principles and facilitating solar access and energy efficiency. The importance of maintaining and building upon these improvements in future iterations of the Code is emphasised, for example through additional deemed-to-satisfy provisions and the development of assessment tools.

Suggested areas of improvement include greater elevation of the need to plan for and mitigate climate risks. Future climate impacts need to be considered at design and development assessment stages to achieve the desired outcomes and the words 'climate change' demonstrate to those using the Code that climate change is an issue that must be considered and taken seriously.

The Council has identified a number of additional opportunities to further strengthen or embed climate change considerations into the Code as follows:

High Quality Design and affordable living

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 high quality, whole of life design approach which requires the consideration of future climate conditions, is recommended. The value of strong whole of life design principles, contributing to lower running costs, higher resale value, improved health, wellbeing, amenity and liveability is also highlighted.

Residential Infill Improvements

With minor infill projected to deliver a significant portion of new housing, the need to focus on high quality and whole of life design approaches is emphasised. Replacing or supplementing existing, often ageing housing, provides an opportunity to improve our housing stock with new homes that are well designed to adapt to the changing climate and reduce new emissions.

The discussion paper provides a good overview of issues relating to infill developments. The Council strongly supports new policies that address these issues including the need for improved water sensitive urban design measures and provisions to contribute to tree canopy targets.

Urban Adelaide's declining tree canopy is of significant concern to the Council. As urban infill is a key contributor to this decline it is suggested that further opportunities for generation 1 reforms to better protect and reduce the loss existing vegetation, natural climate systems and biodiversity should be explored.

Greenfield and Master-planned Development

The Council supports the proposed improvements to greenfield and master-planned development including the introduction of deemed-to-satisfy pathways. It is acknowledged that large scale developments offer opportunities to better plan for and incorporate improved sustainability, water sensitive urban design (WSUD), tree canopy and open space principles. The need to incorporate these principles both at the household and community / neighbourhood level is highlighted (noting the WSUD example on page 47).

Climate Change and Sustainability

The Council strongly supports new policy directions that address the need for water sensitive urban design measures and urban cooling including reduced site coverage, increased impervious areas, promoting tree planting, landscaping and increased tree canopy, enhanced microclimate and improved measures to manage the impacts associated with increased stormwater runoff.

The discussion paper cites that 'improving sustainability measures will improve our liveability and prosperity and is crucial to helping us effectively address and respond to the impacts of climate change. While in agreement with this statement, considerations relating to climate change and sustainability are far broader than WSUD and green infrastructure alone. It is noted however that measures to reduce emissions including improving the energy efficiency of our housing stock and facilitating solar access are discussed elsewhere and also incorporated in the new deemed-to-satisfy provisions.

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