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Dear Ms Elding

I am writing on behalf of the Premier's Climate Change Council (the Council) in response to the State Planning Commission's *Consultation: Draft State Planning Policies for South Australia*.

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. Our members also bring expertise and experience in business and industry, the environment and conservation sector, government, and urban and regional planning.

Thank you once again for the opportunity to nominate Council member Nicole Halsey to contribute in the implementation of the planning reforms as a member of the Community Participation and Sustainability Advisory Committee. I trust that her expansive knowledge and experience has been invaluable in informing policy direction and strategy relating to the reforms.

The current reform provides an important and exciting opportunity to develop a more effective, responsive and functional planning system for South Australia. Overall, the Council considered the draft State Planning Policies (SPPs) to be comprehensive and well considered.

The Council understands that the SPPs will be the highest order policy document in the State Planning System. It is encouraging and fitting that climate change is considered not only as a mandatory policy element but also as a theme throughout the SPPs. Particular strengths of the draft document include:

- Consideration of climate change in terms of risks and opportunities
- A focus on high quality design and adaptive reuse
- Supporting green technologies and industries
- More compact and connected, liveable cities.

While generally satisfied with the current level of focus on climate-related issues, the Council reinforces the necessity for all levels of decision making in the planning system to consider the impacts of climate change. It is of particular importance that climate-related objectives and policies outlined in the draft SPPs, flow through into implementation and are incorporated fully in other key planning documents including the Planning and Design Code and Regional Plans. This includes assuring 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 this information regularly.

While the draft SPPs generally acknowledge climate change as a complex and multifaceted matter, the Council has identified a number of opportunities to further strengthen or embed climate change considerations into the SPPs as follows:

STATE PLANNING POLICY 2: DESIGN QUALITY (ALSO 6: HOUSING SUPPLY AND DIVERSITY)

- Policies and objectives relating to building design and construction should reflect the ambition to *exceed* standards, codes and guidelines. While this may be implied in a number of areas, highlighting it as a specific goal will demonstrate an ambition to raise expectations for planners, approvers and builders.

STATE PLANNING POLICY 5: CLIMATE CHANGE

- A fourth 'Role of Planning' should be added to this policy as follows: 'protect and facilitate adaptation of our valued natural environment including coastal features, air, biodiversity and water resources from climate impacts' (p30).
- While policy 8 (p31) of the climate change SPP 'supports development that does not contribute to increasing our vulnerability or exacerbate the impacts of climate change...', this intent would be strengthened if reflected in other sections relating to development.
- As climate change is a complex and multifaceted matter, the policy should consider the potential for multiple and cascading climate impacts, cumulative effects and exacerbating factors.
- The list of related SPPs (p31) should be expanded in acknowledgment of the wide-ranging nature of climate change, including the following policies: Integrated Planning Design Quality; Adaptive Reuse; Biodiversity; Housing Supply and Diversity; Primary Industries; Employment Lands; Key Resources; Strategic Transport Infrastructure; Energy; Coastal Environment; Water Security and Quality; and Natural Hazards.

STATE PLANNING POLICY 11: STRATEGIC TRANSPORT INFRASTRUCTURE

- While policy 10 (p51) of the Strategic Transport Infrastructure policy flags that development should take advantage of emerging technologies like electric and alternative fuel vehicles, a future-oriented planning vision should more widely acknowledge that the transition to non-internal combustion vehicles is inevitable (and already underway) and that transport infrastructure will need to adapt to accommodate this shift.

STATE PLANNING POLICY 12: ENERGY

- It is important that the planning system supports the State's transition to a low carbon economy, in particular highlighting the importance of renewable energy and associated infrastructure. The importance at all levels (not only at the neighbourhood level) of integrating distributed energy infrastructure should also be highlighted.

STATE PLANNING POLICY 15: NATURAL HAZARDS

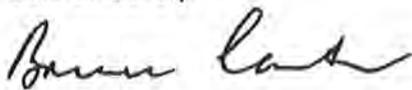
- Consideration of the potential for multiple and cascading climate impacts, cumulative effects and exacerbating factors could also be included in this policy.
- Though implied, the policies under this section do not mention climate change (p62). The policies and planning code overlays should specifically reflect the importance of considering the anticipated changes and exacerbation of impacts due to climate change as well as the hazards themselves.

An overall observation of the draft SPPs is that they are 'metro-centric' and focus on land use and development in a metropolitan or more urbanised context. It is suggested that more consideration be given to regional South Australia, given the important role our regional areas play in terms of food production, tourism, mining and other key industries.

Similarly, a significant portion of South Australia is the remote rural outback. These out-of-districts or unincorporated areas are very much involved in our primary industry and energy sectors in particular and will have significantly different planning needs. It is suggested that more consideration could be given to addressing the importance of these regions and their differing requirements throughout the draft SPPs document.

The Council appreciates the opportunity to provide input to this consultation. We welcome discussion on any aspect of this submission and look forward to contributing further as the planning reforms progress.

Yours Sincerely



Bruce Carter

Chair

Premier's Climate Change Council