

3 December 2018

Alison Collins

Project Lead, Natural Resources and Environment Discussion Paper

Department of Planning, Transport and Infrastructure

GPO Box 1815, Adelaide SA 5001

Email: DPTI.PlanningEngagement@sa.gov.au

Dear Ms Collins

Natural Resources and Environment (NR&E) Discussion Paper August 2018

There is growing recognition of the multiple benefits to the community, economy and environment that come from investment in green infrastructure and water sensitive urban design (WSUD). This includes cooler, greener and more liveable suburbs; improved physical and mental health and wellbeing of communities; reduced flooding; healthier waterways; and clean coastal and marine environments.

A summary of opportunities under the planning reform that support the initiatives proposed in the NR&E Discussion Paper is provided in the attachment. The identified opportunities have been developed in consultation with multiple government agencies, local government and industry partners, including:

- a stakeholder workshop in December 2017 attended by 50 practitioners from local and state governments and the consulting industry;
- an expert panel workshop in March 2018; and
- face-to-face meetings with key agencies and industry associations.

In addition, Water Sensitive SA supports the initiatives within the NR&E Discussion Paper and has several projects and program activities that:

- (i) contribute to the State Planning Commission's vision for how we shape the growth of our city and communities in regard to our natural resources and environment, and
- (ii) support the community and industry to adopt green infrastructure and WSUD principles within their developments

as described below.

Water Sensitive SA

PO Box 351
Uraidla SA 5142

admin@watersensitivesa.com
watersensitivesa.com

**LIVEABLE
WATER SENSITIVE
COMMUNITIES.**



<p>Key opportunities and challenges (Page 27 NR&E Discussion Paper)</p>	<p>Water Sensitive SA initiatives to support NR&E Discussion Paper initiatives</p>
<p>IC – “Develop new ‘Deemed to Satisfy’ and ‘performance outcomes’ policy for WSUD and GI” as Generation 1 reform.</p>	<p>Water Sensitive SA Priority Project 3 (PP3) <i>Draft Guide for water sensitive urban design stormwater management for small-scale development</i> – in development and part of Online tool project PP4 below) offers basic guidance on WSUD elements suitable to apply at the allotment scale to address flooding control, water conservation and stormwater quality improvements.</p> <p>Note: For most typical residential applications, meeting WSUD requirements has minimum costs and may include solutions such as upgrading rainwater tank size and using permeable paving rather than hard paved surfaces for driveways.</p> <p>Water Sensitive SA Priority Project 4 (PP4) The <u>Insite Water online tool for stormwater assessment for small-scale development</u> (currently in beta testing), offers a mechanism for third party certification of WSUD measures for small-scale residential and commercial developments in regard to stormwater runoff quality, volume and peak flow management, and water conservation/water efficiency measures,</p> <p>Water Sensitive SA Priority Project 7 (PP7) <i>Perspectives on Green infrastructure (GI) and water sensitive urban design (WSUD) performance-based planning policy project</i> will provide:</p> <ul style="list-style-type: none"> • Evidence of the need for policy reform in relation to green infrastructure and WSUD; • a stocktake of existing policy and tools being applied locally, interstate and internationally to achieve proposed urban greening and water management objectives; and • Recommendations to support the urban green cover targets and the WSUD strategies within The 30 Year Plan for Greater Adelaide.
<p>1D – “Explore policy that connects the ability of road reserves to accommodate tree planting or other suitable GI in lieu of provision on private allotments”</p>	<p>Water Sensitive SA Priority Project 8 (PP8) proposes to develop a <i>pilot stormwater contribution in-lieu scheme for a Council(s)</i>, with the potential to roll out more broadly across metropolitan Adelaide. This project is yet to be funded.</p>



In addition to these projects, Water Sensitive SA has developed several online technical resources to support development applicants:

- Our Community [Smart water solutions for your home and backyard](#) webpages provide guidance for:
 - [maximising the value of your rainwater tank](#)
 - [reducing hard surfaces outside your home](#)
 - [10 tips for a successful raingarden](#)
 - [showcasing practical, innovative ideas for your new home.](#)
- WSUD in your home and backyard seminars for community members in conjunction with Councils and Adelaide and Mount Lofty Ranges Living Smart initiatives.

The planning reform process and proposed e-planning system provide an excellent opportunity to streamline approval processes, saving time and money through the application of tools that support third-party certification, with a range of deemed to satisfy solutions for achievement of urban green cover, tree canopy and WSUD objectives.

We look forward to the opportunity to provide further input to the planning reform process over the next 12 months.

Yours sincerely

Mellissa Bradley
Program Manager

Water Sensitive SA submission Attachment – Natural Resources and Environment Discussion Paper August 2018

Summary of opportunities

Opportunities exist to better support the objectives and targets for tree canopy cover, urban green cover and water sensitive urban design within The 30-Year Plan for Greater Adelaide. The new Planning & Design Code, associated regulations, assessment tool for third party self-certification, incentives and guidelines will all play an important role in the planning system.

The recommendations below provide a summary of the key initiatives that will lay the foundation for a policy and regulatory framework that will shape our cities and communities, delivering resilience and wellbeing. The proposed timeframes for the key recommendations are within the next 6 months to two years to ensure a cohesive package of works that compliment implementation of Generation 1 (and future generations) of the Planning and Design Code.

Support should continue to be provided for existing and new initiatives that raise awareness of the benefits of green infrastructure and WSUD and engage the community in establishing and maintaining green infrastructure and WSUD projects from the individual dwelling to landscape scale.

The Planning and Code recommendations presented below are considered to be the most important in meeting The 30-Year Plan for Greater Adelaide green infrastructure targets.



Green infrastructure recommendations

Recommendation	Challenge/ opportunity	P&D Code	Regulation	Incentives	Guidelines	Potential partners	When
G1. Establish minimum required areas of uncovered deep soil zones to be provided for different sized developments to provide sufficient space for tree canopy targets in The 30 Year Plan for Greater Adelaide to be met.	New developments need to provide minimum space for the potential establishment of tree canopy cover.	✓				DPTI, LGA	Generation 1 of the Code
G2. Definitions for deep soil zones and tree protection zones be included in relevant planning documents.	Provide clarity for development applicants on green infrastructure terminology	✓	✓				Generation 1 of the Code
G3. Ensure consistent requirement to provide adequate landscape plans.	Consistent and quality landscape plans will play an important function in the delivery of tree canopy cover and urban green cover targets	✓	✓		✓	DPTI, LGA	Generation 1 of the Code
G4. Establish a green cover score system and assessment tool.	The cumulative loss of private green space is a significant contributor to Adelaide's urban heat island.		✓		✓	DPTI, DEW, Water Sensitive SA, AILA, LGA	Generation 2 of the Code
G5. Establish a trading scheme for offsite green cover solutions for situations where streetscape solutions are deemed by the local Council to provide the greatest community benefit.	Provide flexibility in how green cover targets are met as appropriate to the site and context		✓	✓	✓	DPTI, DEW, Water Sensitive SA, AILA, LGA	Generation 2 of the Code



Recommendation	Challenge/ opportunity	P&D Code	Regulation	Incentives	Guidelines	Potential partners	When
G6. In lieu of recommendation 4, develop an index that integrates green infrastructure, tree canopy and WSUD, and prioritises solutions that achieve all three.	WSUD that integrates water back into the urban landscape can support green infrastructure			✓	✓	DPTI, DEW, Water Sensitive SA, AILA, LGA	Generation 2 of the Code
G7. Develop guidance material to encourage the use and placement of green infrastructure to disconnect impervious areas from waterways and regional drainage systems (i.e. guidance material to encourage multi-functional green infrastructure).	Communities can no longer afford single purpose green spaces. Integrated design will be critical to deliver of multiple benefits from a single asset				✓	Water Sensitive SA, CRCWSC	June 2020
G8. Investigate new criteria for rate of open space provision for medium and high-density developments.	12.5% open space targets were created for low density developments. Higher density precincts will require a different metric for determining open space needs of the community	✓	✓			DPTI, AILA, Water Sensitive SA	Generation 2 of the Code
G9. Investigate options for incentive-based planning policy which facilitates desirable development outcomes for proponents (i.e. additional building levels, higher density outcomes, new built form typologies, a trade-off of private open space for larger areas of communal open space for example) where mature trees, which may not be otherwise protected, are retained and integrated into a development proposal.	Provide incentives to deliver greater density while maximising canopy cover and urban green cover as appropriate to the site and context	✓		✓		DPTI, AILA	Generation 1 of the Code
G10. Develop a new definition to protect existing trees with a trunk circumference less than that of significant or regulated trees.	Canopy cover and urban green cover targets will not be met if unregulated mature trees are not protected or replaced if removed.		✓			DPTI, DEW, Treenet	Generation 2 of the Code



Recommendation	Challenge/ opportunity	P&D Code	Regulation	Incentives	Guidelines	Potential partners	When
G11. Develop an agreed approach for (a) valuing trees, and (b) administering Urban Tree Funds, for the purpose of development approvals.	Methods calculating the value of trees identified for removal in Adelaide do not consistently take account of their age, vigor, useful life expectancy, amenity value, and ecological services value.		✓			DPTI, Treenet, LGA	Generation 2 of the Code
G12. Establish minimum diversity guidelines for future urban tree planting, considering the local and broader landscape context, and encourage alignment between green infrastructure investment, ecosystem health, biodiversity conservation, and landscape connectivity.	Effectively integrating biodiversity programs with urban forest strategy implementation in the public and private realm.				✓		Generation 2 of the Code
G13. Monitoring and compliance either through site-based assessments by compliance officers or through the use of remote sensing technology.	Benchmark progress towards canopy cover and urban green cover targets.					DPTI, DEW	Ongoing



WSUD Recommendations

Recommendation	Challenge/ opportunity	P&D Code	Regulation	Incentives	Guidelines	Potential partners	When
W1. Provide easily assessable WSUD criteria (in the form of new 'deemed to satisfy' criteria) for all developments that focus on water conservation, stormwater quality improvements and peak flow management	Practical solutions exists to meet WSUD targets at a range of scales from the allotment scale through to large scale land divisions	✓			✓	Water Sensitive SA / DPTI	Generation 1 of the Code
W2. Promote landscape integration of WSUD, stormwater volume reduction from developments and combining WSUD and green infrastructure measures for multiple benefits	Practical solutions exists to meet WSUD targets at a range of scales from the allotment scale through to large scale land divisions	✓			✓	Water Sensitive SA / DPTI	Generation 1 of the Code
W3. Provide a 'Deemed to Satisfy' solution for small developments (<2,500m ² for residential and <5,000m ² for non-residential) that addresses the identified performance measures for stormwater quality, water conservation, and flooding.	Simple deemed to satisfy solutions will support efficient development approvals while delivering better outcomes for urban water management	✓			✓	Water Sensitive SA / DPTI	Generation 1 of the Code
W4. Develop an on-line WSUD/stormwater tool that enables quick and easy inputs and assessment for small-scale development. Note:Water Sensitive SA Insite Water tool currently in beta testing	Provide flexibility in how WSUD performance targets are met as appropriate to the site and context			✓		Water Sensitive SA / DPTI	Generation 1 of the Code
W5. Monitoring and compliance through site-based assessments by compliance officers	Ensure WSUD solutions are implemented in accordance with approved plans to deliver upon performance targets						Ongoing