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Alison Collins
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Department of Planning, Transport and Infrastructure
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Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Ms Collins

Natural Resources and Environment Discussion & Background Papers

The Planning Institute of Australia SA (PIA) thanks DPTI for the opportunity to provide feedback on the Natural Resources and Environment policy Discussion Paper within our State’s new planning system under the Planning, Development and Infrastructure Act 2016.

Overview

The papers are useful documents intended to inform environment policy within the new Planning & Design Code.

We support the intent to enhance existing natural resource policy by ensuring that the new code includes more detailed policy responses.

PIA would like to emphasise the importance of ensuring that the correct statutory mechanisms are included within the SAPPL to various land management issues that affect South Australia. Importantly, for the policy basis to be effective in our view, areas of environmental significance, including areas with high habitat value must be translated into Overlay’s that have adequate force and affect in Environment Resources and Development Court.

Members from interstate have also commented that they have achieved significant successes on environmental projects through the use of reference/incorporated documents within the policy framework. This mechanism is highly valued interstate as a way of providing statutory weight to complicated environmental matters and we recommend that DPTI consider this method as an option.
PIA supports environmental policy frameworks which are legible and user friendly for all stakeholders, however in order to avoid mediocrity, policy must be designed to accord with current environmental science to be effective.

**Hazard and climate change policy**

Current bushfire mapping in South Australia is unfortunately outdated and it is imperative that there is an immediate review of existing mapping.

Many areas within the State are inaccurately mapped and need to be reviewed as part of the transition into the code to cater for both bushfire and wildfire.

PIA supports the existing overlay mechanism, however the bushfire overlay should be amalgamated into the suite of overlays in the code under the singular overlay heading, not sitting out on its own. It is our view that it must be easier for everyone to be able to identify what planning controls affect their site - unlike the existing system.

Additionally, we recommend mandatory submission of bushfire site assessments with all new dwelling application's in high and medium bushfire areas, which intern are formally referred to the CFS. A greater awareness is needed by owners of land within bushfire areas of what the risks are and how to design/manage their site. Inclusion of landscape guidelines which encourage native planting can help to balance bushfire risk and conservation of environmental assets. (See CFA *Landscaping for bushfire, garden design and plant selection* guide and the extensive bushfire planning reform measures introduced in WA).

PIA also supports improved referral triggers to the Coastal Protection Board with associated clear overlay mapping.

It is our members view also that all land management-based mapping such as flood/inundation be based on current climate data predictions. There are still many local government areas across the state which do not have all their areas mapped due to lack of funding for hydrological assessments. PIA recommends that DPTI support Council’s to utilise the transition to the code to their full effect, which may require additional resource support.

There are many great examples of urban heat mapping nationally and it is recommended that environmental planning policy in the code recognise the need to avoid urban heat islands (*see City of Greater Geelong Urban Forest Strategy 2015–2025 as an exemplar*)

PIA supports the inclusion of an Acid Sulphate Soil Overlay and other land management overlay which helps land owners understand the site-specific planning issues effect their land.
Conserving biodiversity

PIA supports the use of Overlay and Environmental based Zones as a mechanism to define areas of local & state environmental significant. Suite of overlays should be simple and easy for planners & the community with no experience to interpret easily. It is vital that key habitat links are mapped as part of this process and adequately defined.

Comprehensive mapping and flora/fauna assessments are needed in order to provide technical environmental data to support statutory planning assessments. It is recommended that Nature Maps is enhanced and ensure assessment guidelines are clear.

PIA also recommends that structure planning, including for future growth areas include compressive assessments of environmental assets as part of initial feasibility. Flora and Fauna assessments must assess EPBC Act obligations.

There is a great opportunity through the introduction of the Code to ensure that planners have the necessary tools in order to enable proper land use test assessments that supports the work of DEW. This is important as currently we have two pieces of legislation, being the PDI Act and the Native Vegetation Act that do not talk to each other. It is often confusing for planners to understand whose role conservation is and there is an opportunity for planners to minimise vegetation loss through good decision making.

It is our view also that RAMSAR sites should continue to be identified by way of an overlay. Importantly also we recommend creating a referral trigger for land divisions containing significant habitat as there are very few qualified environmental scientists employed in local government to provide internal referral advice.

Water Sensitive Urban Design Measures and Green Infrastructure

We support the inclusion of additional WSUD requirements based on the scale of developments into the code. South Australia has opportunity to focus on national best practice in this regard, learning from interstate counterparts. It is important to understand that the development industry as a whole in SA are not accustomed to incorporating WSUD measures and therefore a level of prescription and consultation is necessary.

PIA also supports the further research into developer offsets for both Green Infrastructure (GI) and Water Sensitive Urban Design (WSUD) measures.

It is our experience that many Council’s locally are reluctant to enforce or require WSUD measures, even in large land divisions, due to a lack of education/budget regarding the maintenance requirements of bio retention basins and swales as an example. As such we also encourage the use of a supplementary planning guides and construction
manuals for local governments such as; *Water Sensitive Urban Design Guidelines, South Eastern Council (Melbourne Water).*

Our members have also commented that planning policy needs to take a regional catchment-based approach to improving water quality, as a piecemeal approach is not as effective.

**Ecologically Sustainable Development**

It is our view that strong best practice ESD Policy is needed to be incorporated into the design requirements within the code.

The use of sustainable design assessment tools is supported and help achieve best practice such as the STEPS and BESS Scorecard used interstate.

**Water resources**

PIA supports consistent zone and overlays to being applied along the Murray River and an improved regional policy approach to protecting the State’s water resources.

Improved referral triggers are necessary, that are easily able to be interpreted. Members often comment that the existing referral system for matters that involve *Natural Resources Management Act 2004* is confusing for both DEW staff and planning officers.

As an example, it is recommended that the prescribed surface water areas be translated into an overlay with easy to interpret assessment guidelines.

PIA supports greater prescription needed around dams which includes referral triggers to ensure water is not diverted from watercourses/catchments. Due to lack of enforcement officers in regional areas of Local Government there are a significant number of illegal dams on watercourses across the State.

Please feel free to contact the undersigned if any further comment is sought via sa@planning.org.au or 08 8337 8816

Yours sincerely
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