16 October 2018

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DPTI

Planning Reform Team

via email: DPTI.PlanningEngagement@sa.gov.au

Dear Planning Reform Team,

RE: PERFORMANCE INDICATORS DISCUSSION PAPER

The Resilient East Project Steering Committee welcomes the opportunity to contribute to the Performance Indicators Discussion Paper, as part of a series of submissions this group has reviewed and provided feedback on for a series of recently released planning reform.

This input does not reflect formal Council consideration by any of the constituent Councils, many of which are making individual submissions to this process.

The Resilient East Project is a partnership between the Campbelltown City Council, the Cities of Adelaide, Burnside, Norwood Payneham & St Peters, Prospect, Tea Tree Gully, Unley and the Town of Walkerville and the South Australian Government.

Despite the Steering Committee participant and collaborating in reviewing a number of reform Discussion Papers and providing considered comment, the group has not received any feedback as to how these submissions are being used to shape the ongoing development of the various planning reform elements. As part of the stakeholder engagement process, the Committee would like to be part of a more collaborative process with better opportunities for two-way flow of information and insight into how these submissions are being received to promote the implementation of climate change adaption actions across the State.

Purpose of Feedback

The purpose of this submission is to identify the importance of developing a full suite of meaningful, strategic Performance Indicators, to support the introduction of the Planning Reforms to ensure the Planning and Design Code is effectively delivering on the aspirations of the State Planning Policies and Regional Plans (yet to be commenced under the PDI Act).

These indicators, if considered now ahead of the implementation date of July 2020 will support the achievement of climate adaptation, including the related canopy cover, water sensitive urban design and biodiversity objectives.

This input is intended to complement the broader planning feedback from participating Councils and provide perspective from regional climate change adaptation practitioners.

The purpose of the Committee's feedback is to ensure indicators align with the key priority actions outlined in the various South Australian Climate Change Adaptation Plans, including the Resilient East Regional Climate Change Adaptation Plan. These priority actions for the Eastern Region include:

- Increase planting across urban areas.
- Increase the area of open space in strategic locations.
- Improve stormwater management to maximise amenity and water reuse.
- Make asset management plans climate ready.
- Prevent development in hazard prone areas.
- Prepare and implement climate ready guidelines for public realm, green infrastructure and urban design.

DISCUSSION POINTS

It is a missed opportunity, as proposed in the Discussion Paper, to separate monitoring into two components with the deferral of setting performance targets to measure outcomes.

It is therefore recommended to expand the scope of Performance Indicators in the first stage to monitor and guide the planning system's performance in delivering good planning outcomes across the State, through the Planning and Design Code, State Planning Policies and Regional Plans.

Please find below comments in relation to the discussion points posed in the Discussion Paper.

DP 1 - Are the system indicators collected now useful? How could they be enhanced?

The current system indicators are not contextualised within a framework for achieving sustainable development. The primary objective of the Act includes to *"support and enhance the State's liveability and prosperity in ways that are ecologically sustainable"*. The Government has established high level, publically-committed goals and targets in relation to the forward direction across the social, economic and environmental dimensions of sustainable development. It would be most useful for system indicators program to be constructed around how well the planning system is performing in relation to supporting these dimensions of sustainable development.

- **Social** – Is the system effectively delivering on the social needs relating to planning?
- **Economic** – Is the system performing efficiently to support development, good design and the broader economy?
- **Environmental** – Is the system delivering on the environmental needs relating to planning, including but not limited to climate adaptation, canopy and green cover, biodiversity protection and enhancement?

The Committee has previously expressed disappointment that developing a green canopy measure for consistent use and application in measuring tree/ vegetation loss or enhancement as a critical target of the *30 Year Plan for Greater Adelaide,* is yet to be confirmed. The Committee notes that the Government's *30 Year Plan for Greater Adelaide Implementation Plan* has as an outstanding action the following*:*

A.62 Develop a process to ensure consistency in how green canopies and other green infrastructure are measured.

The Plan (pg 16) states:
"Particular focus will be placed on ensuring that urban infill areas maintain appropriate levels of urban greenery".

The timing of developing the monitoring tool was set as last quarter of 2017/18 in the Implementation Plan. The Discussion Paper states that the six targets in the 30 Year Plan for Greater Adelaide would be carried over and continues to be reported on. Despite many Councils collecting data on green canopy cover, it is not clear how this is currently being reported on in a standardised format.

The Discussion Paper states that *"there may be opportunities to enhance ways in which targets are monitored and measured, with significant opportunities presented by a centralised ePlanning system".*

To measure the effectiveness of initiatives to increase green cover, including the State Government's recent introduction of Green Adelaide and $2m Grassroots Grants program, it is critical to prioritise the collection of effective vegetation data in the ePlanning system.

The implementation of this monitoring measure should be prioritised and a timeframe defined. Further delay risks criticism that Target 5 for a green liveable City is not important because *"you can't manage what you don't measure".*

DP2 - Is the information in the annual report released by the Planning Minister useful? How could it be improved?

The annual report by the Planning Minister on the implementation of the planning system is a document which has little visibility or profile. The extent to which it is used to drive key planning policy settings and review, is unclear.

The information included in the annual report is high level and lacks sufficient detail and scope to report on how well the planning framework is providing for sustainable development.

It could be improved by including key performance indicators that relate to the goals and targets set by the state Government, including those identified in sister frameworks such as the Natural Resources Management/ Landscape reform management framework. The key performance indicators also need to adequately inform whether the high level objectives of the South Australian Planning framework are being supported. For example, 'Protecting our environment' is a broad and significant commitment that requires a range of indicators well beyond a single measure of urban green cover (which is yet to be reported).

In the broadest sense, the indicators to include in the monitoring program and annual report should report on how well the planning framework is delivering on:

- social and living needs of communities
- financial and economic needs relating to planning outcomes and processes
- environmental needs for current and future south Australians including, whether planning decisions are having a positive or negative impact on:
    - Rural and regional biodiversity
    - Urban biodiversity (is species richness and abundance increasing or decreasing?)
    - Urban tree canopy cover and urban shrub canopy (this can also apply in regional towns and centres)
    - The extent of urban heat islands and cooler areas
    - Extent of water sensitive urban design initiatives and how well these are supporting clean water for the environment for greening activities and receiving water environments.

For key Government initiatives such as Green Adelaide, 20% increased canopy cover and for creating one of the world's most biodiversity vibrant cities, it is necessary to establish a foundation performance condition. Targeted infill development and urban consolidation can be undertaken with good design to preserve and or re-establish urban canopy cover, shrubs, gardens and habitat features with water sensitive urban design that supports cooler living and biodiversity.

Alternatively, development and urban design that fails to protect existing trees, gardens and biodiversity assets, and then fails to re-establish canopy cover and suitable biodiversity habitat, will reduce canopy cover, significantly reduce the health of urban biodiversity and reduce the liveability of urban areas. If development causes harm to biodiversity/habitat connection corridors or pathways (regional or urban), then the impact is even greater.

Councils across metropolitan Adelaide are already taking significant steps to assess canopy cover, vegetation health and urban heat maps which will provide the foundation for future comparison.

To report on changes of biodiversity however, it will be necessary to undertake a number of biodiversity assessments across metropolitan Adelaide, particularly in suburbs where there is a high rate of urban development and /or urban consolidation. This may appear as a daunting task, but it is possible to bring together species lists of Adelaide fauna and flora from many who work in the field, and initiate citizen science opportunities for communities to provide input as to which species are present in their local gardens streets and parks and in what numbers. Professional biodiversity assessments can also be carried out across key location of metropolitan Adelaide in question to confirm and calibrate results, (particularly where significant change is occurring or planned).

DP3 - What examples of interstate planning system performance indicators do you think could effectively be used in South Australia?

The Planning Framework and Green Adelaide with commitments to increase tree canopy cover, shrub canopy cover and urban biodiversity can be world-leading. There are many parallel programs in other states and nations that could be adopted in regard to increasing canopy cover (the 202020 Vision as an example of one of these), but Adelaide's biodiversity is unique and there will need to be specific indicators established in relation to measuring biodiversity, evaluating changes in biodiversity and the needs of populations and species that should be better supported.

In regard to Regulated trees, identifying these spatially and by total numbers (or informed estimates) per suburb, will be an essential baseline data set to then monitor the net gain/loss rates due to tree planting and support strategies, approved tree removals, illegal clearance and
natural/environmental losses.

DP4 - Do you have suggestions for other things that are done well interstate in collecting and evaluating information about the planning system that could be introduced to the South Australian system?

No specific comment

DP5 - What parts of the existing System Indicators Program should be carried over into the new scheme?

The existing System Indicators appear to collect operational data on processing timeframes and development value, which are not comprehensive measures of the 'health' of the planning system. A new set of monitoring measures should be developed in a comprehensive way to provide indicators of when the implementation of planning policy is working well or when changes are needed to the general modules, zones, sub zones or overlays contained in the Planning and Design Code.

DP6 - What are some important types of data or statistics that you think should be collected in the new planning system?

The data and questions should be adequate to assess:

- How will the Planning Framework delivers on the Objectives of the Act in particular, how well the Planning Framework delivers the Primary Objective of the Act as described:

  "The primary object of this Act is to support and enhance the State's liveability and prosperity in ways that are ecologically sustainable and meet the needs and expectations, and reflect the diversity, of the State's communities"

- How well the Objects of the act are promoted

- How well the Principles of Good Planning, as described in the Act, are being promoted including data relating to sustainable development, climate adaptation, environmental protection and enhancement, with reference to "ways that are ecologically sustainable".

The following data and indicators would be required:

<u>For rural and regional South Australia:</u>

- The health of rural and regional biodiversity (species richness and abundance in key locations that are impacted upon by planning decisions), and any changes in biodiversity as a result of development.

<u>For metropolitan Adelaide:</u>

- Quantification/estimate of Regulated and Significant Trees per suburb
- Progress towards spatial recording and documentation of Regulated Trees and Significant Trees
- Detailed capture of data of Regulated and Significant Trees on development sites including those present, those authorised to be removed and those with continuing protection
- The extent of urban tree canopy cover, shrub canopy cover, vegetation health, urban heat islands and cooler areas. This monitoring can be undertaken in alignment with the State of the Environment Reporting on a 5 yearly cycle and could also apply in regional towns and centres.

- The extent to which Water Sensitive Urban Design (WSUD) initiatives are included in development applications and how well these are supporting clean water for the environment, including greening activities and healthier receiving water

environments. A key performance indicator of WSUD progress could, be the percentage of direct *road to river runoff* compared with improved *road to detention and settlement before runoff* (rivers are considered to include to contributory streams). The percentage could be applied to Adelaide as a whole and as a measure across newly approved developments.

- Urban biodiversity (is species richness and abundance increasing or decreasing)
- Urban plantable space in established suburbs (the sum of plantable space in gardens, streets and parks and how much this is changing due to urban consolidation on public and private land).
- Percentage change in impervious surfaces included in development applications
- Energy performance of new development

Sustainable Development and Natural Hazards

With regard to natural hazards, there are ongoing risks with the approvals of developments that have a high exposure to natural hazards including bushfire, flooding, sea level rise and land subsidence. The best solution is to prevent exposure to these natural hazards through good planning. The second best option is to ensure that if approved; those building in those areas have a full understanding of their residual risk and take responsibility for bushfire survival planning, other survival planning, climate risk and adaptation planning, without causing excessive further harm to the environment.

There are still many approvals and even land divisions in locations that are unsafe and cannot be made safe without significant further modification of the environment. The current planning framework may not consider the full impacts of a planning approval which may result in much larger incidental clearance of native vegetation such as for larger asset protection zones, dual access roads (also with asset protection) and possibly further bushfire buffer zones established as priority over environmental assets. One KPI for this challenge is the **annual area of native vegetation cleared/modified for development asset protection zones** including the minimum 20 metres around all developments, the second additional access track (if mandated) and additional asset protection zones created surrounding access roads and tracks, plus the area of any new bushfire buffer zones in native vegetation that may be established to protect new developments.

As climate change impacts continue, the planning framework will need to monitor how effective the framework performs in dealing with increased flooding potential, coastal sea level rise, including constructed defences and providing opportunity for landward movement of natural ecosystems systems such as shorebirds, mangroves, mud flats and mangroves.

In summary, the Committee appreciates the opportunity to provide input into a more meaningful set of measurement data to ensure the reforms to the South Australian planning system are effective in delivering high standards of liveability for communities, alongside achievement of the State Planning objectives of climate adaptation, increase in canopy cover, water sensitive urban design and biodiversity enhancement.

The Committee would be happy to provide further information and input into the performance monitoring measures. If you wish to further discuss the comments contained in this submission, please contact me and I would be happy to arrange a meeting with representatives of our Committee.

Yours sincerely

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