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Government of South Australia

Premier's Climate Change Council

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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: Productive Economy 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 its comments on the Productive Economy Discussion Paper which will inform the development of the new Planning and Design Code (the Code).

GENERAL COMMENTS

The Council acknowledges the significance of these reforms. Given our understanding of the significant adverse impacts of a changing climate on our economy and society it is essential that climate change mitigation and adaptation requirements are clearly and explicitly reflected throughout the Code.

This will require the best available information (e.g. climate change projections) to be used to inform decision making and that requirements are included to review and update information regularly.

The Proactive Economy Discussion Paper provides a good overview of the State's strengths, risks and opportunities as well as relevant and considered information on climate change and natural resources, renewable energy, adaptive reuse, low carbon and circular economy.

The Council supports the vision that our new planning system will embed advanced technologies to complement the anticipated economic benefits of technological change. However, we reiterate the importance for the overall vision, policies and the planning code to provide clear support (and where relevant outline the rationale and benefits) of the State's transition to a low carbon economy, particularly with respect to building, energy, transport and waste related infrastructure and emissions.

The synergies between positive climate action and economic development are well recognised. As noted by the renowned economist, Nicholas Stern, "Governments should recognise both the great peril we face from poor choices or hesitation, and the enormous opportunity on offer from the rapid transition to a clean and sustainable economy".

For example, each year there are new industries, products and markets created in renewables, low carbon transport and waste management. As well as enhancing South Australia's clean,

green image, co-benefits also result from improved public health, reducing cost of living and operating expenses, and ecosystem and biodiversity benefits (e.g. cleaner air and water ways).

South Australia is internationally recognised as a leader in renewable energy and storage. A policy and planning system which enhances and expands upon this expertise will provide ongoing benefits to the State's economy as cities across the globe look to emulate, transforming their own energy supply and security.

The state is on the path to achieving net zero greenhouse gas emissions by mid-century. A number of existing industries may decline due to this transition. Planning policies could consider how to better manage the social impacts of this low carbon transition on workers and communities, including planning for, and investing in a shift to environmentally and socially sustainable jobs, sectors and economies.

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

THEME 1 – SUPPORTING AND GROWING KEY INDUSTRIES

Planning policies and codes should support and promote the State's transition to a low carbon economy. It is recommended that this is recognised as a key economic development theme with specific requirements included in the new Code. Other relevant elements of the Code should also reflect this important focus. In particular the new Code should be developed to enable innovation and investment in new renewables and clean fuel technology.

While South Australia already enjoys a reputation as a clean green producer, opportunities to further enhance and capitalise upon this should be explored as companies and multinationals look to divest in carbon intensive products and trade including reducing their supply chain emissions.

Primary industry policies need to consider and be able to address climate change impacts on the overall amount and quality of arable land and water resources in productive and rural areas. It is recommended that there is a review of primary industry policies to identify opportunities to better respond to a changing climate.

The new Code should also include policies for primary industries that consider and prevent any long-term adverse impact of mining on agricultural production. These impacts could be amplified by climate change.

Similarly policies regarding the location of tourism developments should consider long term impacts of a changing climate.

Primary industry and mining and exploration related policies should consider the potential impacts of fossil fuel exploration and extraction to our reputation as a clean green producer, as a nature-based tourism destination and our capacity to address climate risk. State planners and policy makers should continue to review whether it is in our State's long term economic interest to have a development model that includes exploration and extraction of fossil fuels.

THEME 2 – LINKING PEOPLE TO JOBS, GOODS AND SERVICES

The Council is supportive of the vision for Adelaide and other major South Australian cities to transition to a more poly-centric urban structure and agglomeration-driven economy which better responds to the changing needs of the workforce and consumer.

Overall, it is important that planning policies aim to enhance and maintain key characteristics to retain and attract residents and visitors and retain Adelaide's enviable reputation as an affordable, liveable city. This will require inclusion of specification and performance requirements in the Code that relate to buildings, infrastructure and public spaces that are well designed to adapt to the changing climate and which reduce new emissions. It is likely that most policies will require review and improvement to better address climate risks.

Any update to centres policies and regional centre zones should explore opportunities to improve sustainability and climate resilience as this will also support economic efficiencies (e.g. waste and energy savings) and potentially increase competitiveness.

Aligning to the theme of 'promoting access to skills and know-how', an additional requirement is recommended to: encourage stronger built efficiency and sustainability standards within the retail sector. As well as supporting lower running and maintenance costs, this will assist in the attraction or retention of companies looking to improve or maintain their sustainability commitments and help ensure that South Australia's retailing sector remains competitive.

THEME 3 – PROVIDING INFRASTRUCTURE TO ENHANCE OUR LIVEABILITY

Planning policies and overlays should consider the future climate in strategic planning and in specifications and performance requirements for infrastructure location and design. Responding to the impacts of climate change requires an increase in scale and ambition for long lived, robust and climate adapted infrastructure.

Policies should be considered that identify policy incentives for emissions reduction, including energy efficiency, renewables, sustainable transport, adaptive re-use and more efficient and sustainable waste management, for existing and new buildings.

The Council supports the need for strategic infrastructure planning, developed in collaboration across government agencies and regions as well as relevant private organisations (including contractors).

In providing flexible regulation to support new energy technologies, planning policies should consider future opportunities in strategic transport planning and in linking transport and infrastructure planning with emerging industries and low carbon opportunities in our State. For example, production and accessibility of hydrogen and bio-energy to power vehicles as well as further electrification of public and private transport networks.

The Council supports a process for the Code to be updated regularly to ensure that our State is able to take early advantage of advancements in energy generation, storage and distribution (as per page 39 of the Discussion Paper).

THEME 4 – FACILITATING INNOVATION AND ENABLING INVESTMENT

The Council supports policy changes that encourage the development of industrial ecology or innovation precincts where businesses can collaborate or cluster, sharing resources and transferring waste from one business as a product for another's.

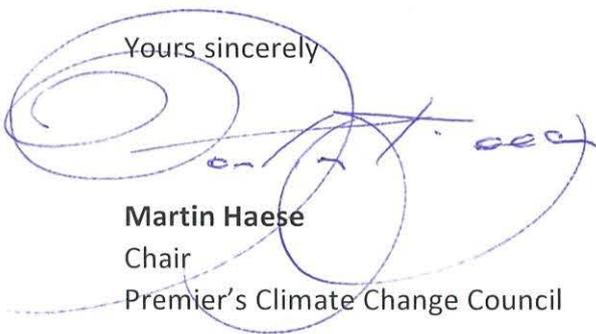
Zones and regulatory provisions should also ensure that district scale services are encouraged and supported. An example is the Tonsley District Energy Scheme which provides renewable energy, recycled water, gas and domestic hot water services with future provisions for heating and cooling. Such schemes have multiple benefits. As well as reduced utility bills and access to secure and lower emission supplies of gas, water and electricity, occupants will also benefit from not having to purchase and maintain individual systems (including hot water, solar and rainwater tanks for non-potable supply).

Additional innovation and industrial zone policies should be considered that facilitate sustainability and climate adaptation. As a state we should aim to ensure that industrial and innovation precincts have strong sustainability standards and are designed to reduce net emissions and address impacts of a changing climate.

In promoting and identifying future innovation precincts, policies should encourage or require use of renewable energy, and consider how current and potential future over-production (surplus to demand) of renewable energy could be used to attract new businesses or build upon existing industries.

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



Martin Haese

Chair

Premier's Climate Change Council