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Expert Panel

[DTI.PlanningReview@sa.gov.au](mailto:DTI.PlanningReview@sa.gov.au)

Marjorie Black House  
47 King William Road  
Unley SA 5061

P. 08 8305 4222

F. 08 8272 9500

E. [sacoss@sacoss.org.au](mailto:sacoss@sacoss.org.au)

[www.sacoss.org.au](http://www.sacoss.org.au)

ABN 93 197 662 296

To whom it may concern,

**RE: Planning System Implementation Review**

Thank you for the opportunity to make a submission to the Planning System Implementation Review.

The South Australian Council of Social Service (SACOSS) is the peak non-government representative body for health and community services in South Australia, and has a vision of justice, opportunity and shared wealth for all South Australians.

Our mission is to be a powerful and representative voice that leads and supports our community to take actions that achieve our vision, and to hold to account governments, businesses, and communities for actions that disadvantage vulnerable South Australians.

SACOSS aims to influence public policy in a way that promotes fair and just access to the goods and services required to live a decent life. We undertake research to help inform community service practice, advocacy and campaigning. We have 75 years' experience of social and economic policy and advocacy work that addresses issues impacting people experiencing poverty and disadvantage.

Our submission to this review recommends that the Expert Panel consider not merely the operation of the planning system but the impact of the planning system at the intersections between poverty, housing, energy, water, climate change, and disaster risk and resilience.

Consequently, we recommend the following:

1. that all South Australian planning and development instruments include objectives for reducing inequality;
2. that the Objects and Principles of the Act are amended to include specific reference to community equity and wellbeing;
3. that sustainable development is clearly defined in the Act and that its application through all planning and development instruments addresses the social aspects of sustainable development; and
4. that the Act be amended to ensure it doesn't allow for development that is contrary to its sustainability objects and principles outlined.

SACOSS believes that all South Australian planning legislation, regulation, and supporting policies and guidelines must include the objectives of reducing inequality and promoting the inclusion and participation of people who face disadvantage. The objects and principles of the Act should be revised to include explicit references to promoting equity and wellbeing in the community. We also suggest that the review considers a stronger focus on the social impacts and aspects of planning and design in any changes to the current planning and development system.

Sustainable development is internationally accepted to mean development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The concept of sustainable development is focused on ensuring that development progresses across three underlying pillars: social inclusion, environmental sustainability, and economic prosperity. However, the legislation – while referring to development being sustainable – focuses only on the ecological aspect of sustainable development. SACOSS suggests including a clear definition of sustainable development in the Act that reflects all three aspects of sustainable development, not solely the ecological aspects.

Our State's planning laws focus overwhelmingly on facilitating and attracting development and supporting private investment, rather than regulating development for the greater benefit of the public. This leaves public sector planners in particular with little support in legislation to reduce environmental impacts and balance social, economic and environmental considerations. Further, there are weak planning requirements for sustainability (particularly the social inclusion aspects) in development plans and a lack of tools, requirements and standards supported by the legislation (and associated regulation and other policy documents) that would allow for independent, comprehensive and systematic assessment of the sustainability implications of proposed developments (Dühr et al., 2020).

Any changes to the Act to improve sustainability outcomes need to broaden their scope of consideration from focusing on the building site and design, and should include greater consideration of the overall planning context and the community's needs. Considerations of economic competitiveness and environmental sustainability must also be balanced with social fairness. Simply seeking to cut red tape as part of a race to the bottom to attract investment and development leaves behind environmental and social objectives, with serious societal consequences. In a recent review of Australia's overall progress on the Sustainable Development Goals, not only are we among the worst of all OECD countries, but hardly any progress has been made towards the SDG on sustainable cities and communities (UNAA, 2019; Allen et al., 2020). SACOSS views this review as an opportunity for the government to set more concrete requirements in our planning and development system

that would move our State further along in ensuring we have sustainable cities and communities.

Sustainable cities need engaged communities, with planning processes that enable and prioritise the availability of social and community infrastructure where needed. In planning decisions those who are most affected can often be left out of discussions. South Australians experiencing disadvantage are often the canaries in the coalmine when planning, design, and city integration decisions get it wrong – so the government should be calling on their knowledge and experiences from the outset to forge better urban spaces. People without cars know where transport does not link up; young people will identify where they don't have parks or spaces to gather; and community groups know when they cannot find venues to meet or hold events. Older people, parents, and people with disability know when locations are inaccessible. We need to ensure that planning decisions respond to the people who live there. The planning process must include community needs analyses for transport, community facilities and community development.

Finally, SACOSS is concerned that, despite objects and principles of the Act seeking to encourage ecologically sustainable development, the Act continues to enable development that does not meet this objective.

For example, the Act currently permits developers to mandate gas connections in new developments. Gas is not a sustainable or renewable energy source and yet the sustainability principles in the Act states that “particular effort should be focussed on achieving energy efficient urban environments that address the implications of climate change” and “policies and practices should promote sustainable resource use, reuse and renewal and minimise the impact of human activities on natural systems that support life and biodiversity” (s14 (e) (ii) and (iii)). For South Australia to achieve its climate commitments, gas connections in new developments must be banned.

Mandating gas connections also takes away consumers right to choose renewable energy sources and can also lock households into higher energy bills. Recent analysis of household energy bills by Renew showed households reliant on gas face annual energy costs nearly \$2000 higher than all-electric households and predicts that household energy bills will increase for most households that are connected to gas (McLeod, 2022). Without policy intervention households will be locked into higher energy costs with limited options to reduce their bills. Changing our planning laws to ban new domestic gas connections is a simple step government could take to provide future energy bill relief for South Australian households and meet climate commitments.

If you have any questions in relation to this submission, please contact our policy officer Malwina Wyrą at [malwina@sacoss.org.au](mailto:malwina@sacoss.org.au) or on 8305 4228.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'R Tooher', written in a cursive style.

**Dr Rebecca Tooher**

Director of Policy and Advocacy  
South Australian Council of Social Service

**References**

Allen, C., Reid, M., Thwaites, J., Glover, R., and Kestin, T. (2020). Assessing national progress and priorities for the Sustainable Development Goals (SDGs): experience from Australia. *Sustainability Science*, 15(2), 521-538.

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McLeod, R. (2022) *Limiting energy bills by getting off gas: all-electric homes after the 2022 energy crisis*. rep. Renew. Available at: <https://renew.org.au/research/limiting-energy-bills-by-getting-off-gas/>.

UNAA United Nations Association of Australia (2019). UNAA Statement on the Sustainable Development Goals, November 2019. Online: <https://www.unaa.org.au/sdg>