

State Infrastructure Strategy – Discussion Paper October 2023

Submission

November 2023

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Introduction

About the Local Government Association of South Australia

The Local Government Association of South Australia (LGA) is the voice of local government in South Australia, representing all 68 councils across the state and the Anangu Pitjantjatjara Yankunytjatjara.

The South Australian *Local Government Act 1999* (LG Act) recognises the LGA as a public authority for the purpose of promoting and advancing the interests of local government. The LGA is also recognised in and has prescribed functions in 29 other South Australian Acts of Parliament. The LGA provides leadership, support, representation and advocacy relevant to the needs of our member councils.

The LGA is a strong advocate for policies that achieve better outcomes for councils and the communities they represent. As such, the LGA welcomes the opportunity to provide commentary on South Australia's 20-Year State Infrastructure Strategy Discussion Paper – October 2023 (the Strategy Discussion Paper). The LGA further welcomes opportunities to be involved in the development of South Australia's 20-Year State Infrastructure Strategy (the Strategy) as Infrastructure SA looks forward to finalising this in late 2024.

This submission has been informed by existing policy positions, evidence-based research and consultation undertaken by the LGA with members during October and November 2023.

In its submission, the LGA seeks to highlight the opportunities and challenges that will be present over the next 20 years as the world adapts to and manages responses to the global 'megatrends' that the Strategy Discussion Paper has identified. This commentary has been provided from the perspective of the local government sector and lifts up those examples where activities are occurring across the sector that can be of broader benefit across the state as models to consider or adopt.

Consultation on the Strategy Discussion Paper

In respect of the context of the current consultation on the Strategy Discussion Paper, the LGA notes that Infrastructure SA:

- Is an independent State Government agency providing advice to the Government on coordination, planning, prioritisation, delivery and operation of infrastructure.
- Is tasked with developing the Strategy and reviewing this every five years, with the first Strategy being delivered in May 2020.
- States the aim of the Strategy is to assess statewide infrastructure needs, strategic goals and priorities to 2045.
- Released the Strategy Discussion Paper on 1 October 2023 to help inform the process of developing the Strategy.
- Proposes to present the final Strategy to the State Government in late 2024.

The LGA further notes that officers from Infrastructure SA were invited to undertake a presentation to one of the LGA committees, the South Australian Regional Organisation of Councils (SAROC), on 16 November 2023. The LGA thanks both Tara Hage, Manager Strategy and Catherine Jamieson, Manager Infrastructure Strategy and Policy for their attendance and presentation to SAROC.

The presentation addressed that in undertaking its review of the first Strategy, Infrastructure SA has modified its approach, taking a more objectives and outcomes-based approach to development of the final Strategy. It is also noted that the Discussion Paper is intended to establish a basis for further targeted stakeholder consultation and engagement into the early part of 2024, as Infrastructure SA works towards delivering the Strategy. The LGA welcomes further opportunities to be involved in these rounds of stakeholder engagement, as a peak body for the local government sector.

The Strategy Discussion Paper:

- Is divided into sections and identifies six key strategic objectives that Infrastructure SA seeks to achieve through the new Strategy. The LGA secretariat has aligned its discussion within this submission to the objectives outlined in the Strategy Discussion Paper, and focussed on those areas that are most relevant to the local government sector.
- Identifies context around global 'megatrends' that will influence local considerations in infrastructure planning over the next 20 years. These include climate change adaptation, digital transformation and cyber security, shifts in population, workforce and skills, increasing global instabilities, and push towards inclusivity in social and economic systems and practices. Some of these matters have already been identified by the LGA and members as policy priorities for ongoing work or dedicated project development on the LGA work schedule.

Background

LGA submission to the May 2020 Strategy

The LGA made a comprehensive submission to the development of the first Strategy. The key points of that submission included that the Strategy must:

- Give appropriate consideration to the contribution, opportunities and challenges associated with local government infrastructure.
- Support ongoing investment from the State Government in local infrastructure.
- Advance the state's partnership with local government through collaboration towards shared objectives.
- Identify innovative funding models that provide certainty of funding for local government infrastructure while putting downward pressure on council rates.
- Support joint advocacy to the federal government that unlocks fair and equitable funding opportunities for South Australia.
- Recognise that ambitious targets need evidence based strategic actions to achieve meaningful and sustainable outcomes.
- Recognise infrastructure's role in supporting economic growth, community development and wellbeing, and protecting the environment. These are all functions that are aligned with the objectives outlined in the LG Act, for which the local government sector is responsible.

These principles remain important and should again be considered in the current revision of the Strategy.

LGA Submission

In making a submission to the Strategy Discussion Paper, the feedback provided by the LGA membership has been prefaced by some general commentary regarding the South Australian context, particularly as it relates to the State Government's stated growth agenda. This is followed by discussion aligned with the six key objectives outlined in the Strategy Discussion Paper.

The LGA secretariat did not receive responses to all issues outlined in the paper. Commentary in this submission has been limited to those areas which are of most concern to members. The LGA also notes that some councils provided a submission directly to Infrastructure SA on the Strategy Discussion Paper.

The LGA submission makes 30 recommendations to consider in the further development of the Strategy.

Current South Australian context

The LGA notes that since the last state election, over the last 18 months the State Government has outlined an ambitious growth agenda for the state. With the publication of the first South Australian Economic Statement in March 2023, the State Government has set a tone for its 'smart, sustainable and inclusive' economy, and with it comes a large program of works to help deliver on this agenda.

In pursuit of the stated growth agenda, the LGA notes that there are currently significant levels of consultation and engagement being undertaken across the State Government in a range of portfolios. A great number of these consultations cross over into matters of keen interest to the local government sector, in everything from growing the hydrogen and renewable energy sector to water security, urban greening, regional planning, and of course infrastructure planning, such as development of the Strategy. As the peak body in South Australia for local government, the LGA welcomes opportunities to be involved in the consultation and development of these core initiatives on the State Government's agenda.

The State Government should ensure that there is alignment of purpose and objectives across the delivery of this broad economic and growth agenda. Furthermore, State Government needs to be well equipped, both with internal resources, but also through strong local government and commercial partnerships, to be able to deliver on stated targets.

With this context in mind, some of the feedback that the LGA and members have shared in this submission, has a significant cross over with feedback provided to other active or recent consultations that have been run by the State Government. While inherently challenging because of the varied nature of the responsibilities spread across State Government agencies, an integrated approach to developing key statewide strategies is preferable to ensure that more efficient and effective collaboration is realised with the community and key stakeholders.

The points made in this submission regarding strategic alignment will deliver more meaningful outcomes for the communities we serve. The Strategy should also prioritise productive and efficient infrastructure expenditure for all tiers of government, reducing duplication of infrastructure development, enabling better use of existing assets, and providing consistent and clear mechanisms for industry on the funding of infrastructure projects.

General recommendations

The LGA recommends that the Strategy:

1. Encourages the State Government to consider ways to move towards greater integration on consultation and development of key statewide strategies. For example, more alignment is required across the following strategies that are either completed, currently being developed or proposed for future development:
 - South Australia's 20-Year State Infrastructure Strategy.
 - The Greater Adelaide Regional Plan (GARP).
 - Regional plans for the further six regions identified by the Planning, Development and Infrastructure (Planning Regions) Proclamation 2020. It is understood these planning processes are due to commence in early 2024.
 - The Resilient Water Futures project, that aims to deliver the Urban Water Strategy by mid-2024.
 - The South Australian Government Climate Change Actions.
 - The Urban Greening Strategy, being led by Green Adelaide.

(Noting that the above list is meant for illustrative purposes and is not meant to be exhaustive)

Commentary on the intersection across some of these planned or proposed statewide strategies is contained in this submission.

2. Recognises infrastructure's role in supporting economic growth, community development and wellbeing, and protecting the environment. These are all functions that are aligned with the objectives outlined in the LG Act, for which the local government sector is responsible.
3. Notes that the local government sector seeks to work closely with the State Government on developing its stated economic and growth agenda, and provide a smart, sustainable and inclusive future for all South Australians.

The six key objectives

1. Enabling infrastructure unlocks higher productivity and economic growth to improve our living standards

Freight and supply networks

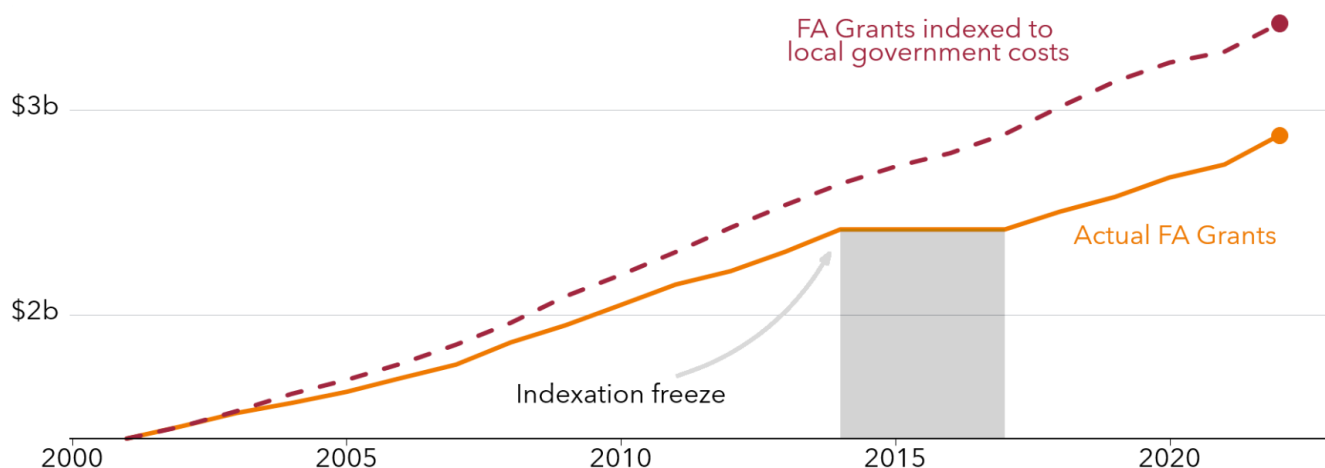
A key enabler of an efficient, accessible and productive freight sector is in ensuring that adequate road corridor maintenance actions are supported, particularly in regional areas. Road networks are critical to the transportation of a range of goods across the state, this includes the movement of raw materials, mining materials, equipment, and primary produce to local and export markets. Accordingly, federal Financial Assistance Grants are an essential component in adequate road investment and maintenance activities, and these grants have not kept pace with rising costs.

Research released recently by the Grattan Institute demonstrates where this Commonwealth funding is deficient (refer Figure 1).

Commonwealth funding for local government has failed to keep up with costs

GRATTAN
Institute

Financial Assistance Grants 2001-2022, actual value and estimated value if indexed by local government costs



Notes: Values determined by taking value of grants in 2001 and indexing annually according to (a) the method outlined in the Local Government (Financial Assistance) Act 1995 (population and CPI growth), with an indexation freeze starting in 2014-15 and ending in 2016-17 (orange); (b) population and growth in the SA local government price index (red).
Sources: Department of Infrastructure, Transport, Regional Development, Communications and the Arts 2023a, The South Australian Centre for Economic Studies 2023, ABS 1999

Figure 1: Grattan Institute report *Potholes and pitfalls: how to fix local roads*

The Grattan Institute suggests local roads are in a state of dangerous disrepair and recommends an extra \$1 billion is needed each year to ensure councils can adequately maintain them. The Grattan Institute's report *Potholes and pitfalls: how to fix local roads* recommended the Federal Government increase untied funding to councils through Financial Assistance Grants.

In response to this report, and in a major step toward better road safety, connectivity and productivity across South Australia's local roads, the Federal Government did announce significant increases to its flagship road infrastructure programs. The funding boost will be phased in over five years to eventually double Roads to Recovery from \$500 million to \$1 billion per year, increase Black Spot funding by \$40 million per year and merge the existing Heavy Vehicle Safety and Productivity Program (HVSPP) and Bridges Renewal Program (BRP) to create a new Safer Local Roads and Infrastructure Program (SLRIP).

The LGA welcomes the announcement regarding increased funding and emphasises the importance of strengthening road safety and improving freight productivity outcomes on local roads. More than 75% of Australia's roads are managed by councils. For many smaller councils in regional and remote areas, they are much more financially constrained, which in turn limits their options to keep local roads in acceptable conditions.

Increasing funding under the new SLRIP from \$150 million to \$200 million will deliver positive outcomes for communities and industry. However, it is noted that the early November 2023 announcement by the Federal Government for \$41 million in funding to flow to 11 projects through the BRP resulted in no gains to South Australian projects.

Currently, the BRP and HVSPP permit applications lodged by local councils, and these applications must have the support of the relevant state or territory government, which provides an assessment and

merit scoring for the project. Additional clarity for councils around the state's prioritisation agenda for road infrastructure investment will provide harmonisation and reduce the burden on both the South Australian Department for Infrastructure and Transport and councils that want to apply for funding from these federal programs. This clarity will move towards ensuring that the efforts from all sides are best directed to projects of the most holistic value for the state.

This intersection demonstrates that a strong partnership between State and local government is a key enabler to ensuring adequate access to funding through the above programs flows into South Australia over the period covered by the next Strategy.

Considerations also need to be made in road and bridge asset maintenance activities that support a move towards freight transport decarbonisation to meet next zero commitments. This means preparing for the potential impacts to road infrastructure planning, particularly for the local government sector, of freight vehicles that were previously considered 'oversize and overmass'.

Most heavy vehicles in Australia are imported from Asia, Europe or North America. Australian heavy vehicle standards are more than 90% harmonised with international vehicle standards (depending upon the vehicle category), such as United Nations (UN) regulations. The push towards incentivising cleaner and greener vehicles for heavy freight means the Australian adoption the UN "Euro VI emission standard". This is outlined by the National Heavy Vehicle Regulator in their [2020-2025 Productivity Plan](#).

As a payload critical industry, there would be no commercial incentive to justify an investment to upgrade without an increase in mass limits to maintain existing levels of productivity. This increase will have a critically significant impact on freight corridor planning over the next 20 years as existing corridors will need to be maintained and in many cases upgraded to support this transition. Again, unlocking funding strategies to assist councils offset the cost impacts of these changes will be crucial to assist freight productivity as that industry moves towards net zero targets.

Water

The LGA notes the Strategy Discussion Paper references the strategic initiative being led by SA Water on the Resilient Water Futures project (RWF). Infrastructure SA may be aware that the LGA is a key member of the Strategic Advisory Committee for the RWF, and one of RWF's main objectives is to see the delivery of a 50-year Urban Water Strategy for Greater Adelaide. This is due to be released in mid-2024. The LGA acknowledges the concurrent development of the Urban Water Strategy, through the RWF, and the State Infrastructure Strategy.

Early themes that are emerging from the RWF show that there is a need for carefully planned action in relation to sustainable water security for Greater Adelaide, even in the short term. There is a strong need for a more integrated water supply system, for example between different sources of potable water, recycled water and stormwater, to diversify the supply mix and make us less dependent on rainfall. This will require an adaptive plan, where water supply options can adapt to a changing climate, changing population, and other change drivers.

The RWF is also recognising that many councils play an important role in an integrated water system, through the provision of water, wastewater and stormwater services to many communities. Strong collaboration between all stakeholders, including councils, will be important in delivering an adaptive and integrated water plan.

In relation to enabling sustainable and affordable water supplies for South Australia into the future, the local government sector recognises its obligation to conserve water resources, protect water quality,

provide water for the environment and effectively manage storm and flood water. Further, councils are committed to contributing equitably to improving water management infrastructure and processes, notwithstanding the responsibilities of federal and state governments.¹

All member councils that responded to the LGA secretariat in relation to this submission indicated future water security as one of the most critically important factors to plan for over the coming years as our climate changes.

In particular, councils noted the following:

- Reliance on the River Murray will become increasingly problematic as the climate changes and alternate options for water supply must be considered. This may include requiring new developments to be more self-sufficient in the collection of rainwater at site or being more dynamic with levies and costing of water consumption for heavy users. It will also need more nuanced collection and use of recycled water supply for some purposes where potable water is not required.
- A major infrastructure priority should be in transitioning Adelaide towards becoming a water sensitive city, incorporating water sensitive urban design (WSUD). The Strategy should address water provisioning for more efficient water capture, treatment and reuse, including for stormwater and wastewater, to reduce pressure on other water sources. 'Marion Water' was provided as a positive example of a recycled non-drinking water program distributing water to parks, schools, reserves and industry within that council locality that could be used as one model to assist this transition.
- Greater consideration needs to be given to increasing permeable surfaces to enhance stormwater management through retention and detention of water that would otherwise be run-off. Potential actions could include mandating use of permeable surfaces through the Planning and Design Code.
- There is sector support for the Northern Adelaide Irrigation Scheme, which aims to achieve growth in agricultural industries through increased access to water resources. However, clearer articulation is needed within key strategies, for example the Strategy and the GARP, and across organisations (e.g. SA Water, local government, private landholders) to support consolidated access to resources to support this program.
- The Northern Water Supply Project currently underway proposes a desalination plant for the upper Spencer Gulf. This project has the potential to transform the region and remove the reliance on freshwater through the River Murray. Along with complementary water management and stewardship activities, the sector notes it is important to continue exploring climate independent water sources such as desalination plants.
- To safeguard water sources into the future, we need to take an integrated, holistic and future focussed water planning approach. This has been recognised by the respective Regional Landscape Boards constituted under the *Landscape South Australia Act 2019 (SA)* (the LSA Act). The LGA notes that the LSA Act is currently under statutory review by an Independent Reviewer, with a report due to be tabled in the South Australian Parliament early in 2024. The LGA has also made a submission to that review, which is publicly available on the LGA website. The LGA also understands that the current State Landscape Strategy, which aims to support sustainable management of the natural resources in South Australia, including water, is also currently under review.

¹ LGA Policy Manual 4.3 Water Resource Management | LGA South Australia

Sewerage

SA Water generally provides new sewerage connections in the Adelaide metropolitan area (and large country towns) and/or where there is a short-term commercial incentive for it to do so.

In the remaining parts of South Australia, wastewater networks are predominantly managed and maintained by local councils, through community wastewater management schemes (CWMS). Councils do not have access to the same level of systems, machinery and specialised staff as SA Water.

The State Government only allocates around \$4.5 million per annum for new CWMS systems. Consequently, CWMS schemes rely on a user-pays charging system to recover the costs of operation, maintenance and replacement, which can lead to CWMS charges for local communities exceeding SA Water's sewerage charges where they provide this service. This presents a challenge for those communities that have limited capacity to pay for those costs and may lead to underfunding of CWMS services by councils.

CWMS arrangements limit efficient investment in sewerage schemes and represent a bottleneck, limiting growth in industry, housing for workers and therefore employment. Accordingly, this represents a major constraint to the potential economic development of South Australia, particularly in regional areas.

Energy

The LGA supports the economic ambitions of the state for net zero carbon emissions by 2050 and to deliver modernisation of electricity distribution networks for securing reliable and affordable clean energy into the future. The LGA also supports commentary in the Strategy Discussion Paper around provisioning for the forecast growth in electrification across the state over the coming period covered by the Strategy.

The LGA notes the State Government's partnership with the RAA to construct and operate Australia's first statewide electric vehicle (EV) charging network. Infrastructure provisioning over the coming period covered by the Strategy will be integral in supporting projects such as the RAA's EV charging network, and to ensure that early adopters in the regions are adequately serviced by charging infrastructure to allay range anxiety. This infrastructure will also support tourism outcomes as climate conscious travellers seek to explore the local regions in ways that provide a low carbon footprint.

However, for many years State Government legislation, through rate prohibition clauses, has compelled councils to grant a discount on council rates to electricity generators by exempting improvements such as electricity generating plant and equipment from capital valuations. The mandatory rating discounts were [appropriately] granted when most electricity generators were in State Government hands. As private providers have entered the energy market, regulatory reform has not kept pace with the changed market conditions.

The result of this regulatory constraint is that when council set annual rates revenue targets for budgeting purposes, in practice, this revenue is not equitably collected across all users of council services, infrastructure and assets. The significant loss of rates revenue from private industry means that, by default, private ratepayers within the community, including families and small businesses, are effectively subsidising these energy producers' rates. These costs would otherwise be borne by the relevant energy provider and form part of their total overhead operating costs, as is the case for other landholder businesses.

A 2020 report prepared for the Legatus Group notes that the competitiveness of South Australian regions in attracting renewable energy developments will not be impacted if the rating policy is amended, particularly if rates levied are comparable with Victoria. Consequently, there would be no negative impact on investment and employment opportunities in South Australian regions as a result of levying appropriate rates on electricity generators.

In contrast, an opportunity exists to provide a financial, economic and social boost to South Australian regions. Rate payments retained within local economies is estimated to provide sufficient stimulus to sustainably create up to an additional 43 permanent full-time equivalent regional jobs, assuming the Victorian regulated formula approach is adopted. Maintaining current rating policy may indeed prevent these additional regional employment opportunities from occurring.

On behalf of members, the LGA advocates for legislative changes to enable a more equitable distribution of rate charges across all landholders, including electricity generators which have benefited significantly from the longstanding rate prohibition clauses.

Digital connectivity

The LGA notes the State Government's announcement in October 2023 in relation to a significant investment in regional mobile infrastructure in the Limestone Coast. This project, and the \$5.5 million State Government commitment to funding Telstra's 'South East SA Project', will be an interesting test model to determine whether this is feasible to roll out to other areas where digital connectivity is not yet adequate to meet global developments in cyber security threats to critical infrastructure. In addition, there is benefit in monitoring developments on this project relating to customer service and digital infrastructure's role in supporting regional economic development.

The LGA notes that some member councils questioned the funding outlay to local councils of 5% of the overall project cost, and whether this type of digital infrastructure development should be a core function of council.

It is noted that digital connectivity is a key driver in creating equitable societies. It is understood that around 18% of South Australian households still do not have access to the internet which risks creating and fostering the digital divide, excluding many people from fully participating in society, education and employment.

Recommendations – Objective 1

4. Noting the recent road infrastructure funding announcements by the Federal Government, State and local government need to act in partnership to advocate for and unlock an equitable portion of this funding benefit for South Australia. This could be achieved through establishing working groups or as part of the work to be undertaken by the Local Government Coordinator through the proposed State-local Government Accord.
5. There is a shared responsibility across all tiers of government in securing sustainable water futures in South Australia. Members viewed securing access to water as one of the key infrastructure needs over the period to be covered by the next Strategy. This will be supported and enabled by integration across strategies, including with the development of both the State Infrastructure Strategy and the Urban Water Strategy when both are finalised.
6. The Strategy needs to acknowledge and address the inherent constraints to economic development and growth for those localities where potentially underfunded CWMS' are the primary system for the treatment and management of wastewater.

7. That the State Government consider annulling the rating prohibition clauses for electricity generators to support a more equitable distribution of rate charges across South Australian ratepayers.
8. Given the State Government investment in the Telstra South East SA Project, it is recommended that this digital connectivity project is closely monitored to determine whether this model has merit to consider for other localities where digital services and connectivity require improvement.

2. Liveable and well-planned places attract skilled people, support a growing population and create prosperous communities.

Regional planning

Infrastructure and regional planning activities need to be closely aligned to ensure effective delivery of outcomes. As referenced in the Strategy Discussion Paper, the State Planning Commission (SPC) recently concluded a consultation period on the GARP Discussion Paper.

Through a process to engage with members on a response to the discussion paper supporting development of the GARP, the LGA has overwhelmingly confirmed that infrastructure is a critical issue in delivery of development plans and will be a key issue to delivering the growth anticipated for Greater Adelaide. Indeed, the challenges in this space are not in planning per se, but in *infrastructure planning*.

Results from internal consultation with members show that there is a vast array of infrastructure challenges faced in planning for future developments. Of the key issues identified, public transport, road upgrades, water management, public open space and community services (social infrastructure) have been identified as the most challenging aspects that must be better coordinated into the future, to support the growth agenda on offer for the state.

Presently, infrastructure provision occurs in an inconsistent and ad hoc way with a lack of long-term infrastructure planning by service providers. In built-up suburbs where general infill is occurring at high rates, often tripling the number of dwellings in a street, developers make no direct contribution to the provision of infrastructure. Conversely, where a developer is delivering a master planned neighbourhood, they often pay for all the trunk infrastructure to service that development.

The residential growth investigation areas, satellite cities and employment land investigations areas will be crucial to support anticipated growth. However, for these growth areas to be successful there needs to be corresponding infrastructure provision such as an integrated public transport network (preferably rail), freight by-passes, strong linkages to social infrastructure and open space provision.

As the SPC looks to engage in further regional planning for the six regions, from early 2024, similar challenges will be presented for the planning action for each of these regional plans. However, some nuances will need to occur at local levels to address more localised opportunities and challenges.

In developing the Strategy, Infrastructure SA could look to the Victorian model of Precinct Structure Planning for inspiration about how to plan socially and economically connected communities.

Recognising that any interstate and overseas modelling considered always needs to be tailored for the local context here in South Australia.

In relation to cost burden of regional infrastructure planning:

- Rural and regional councils shared concerns that, due to the concentration of Adelaide centred population mass and distance to the more regional areas of South Australia, costs for infrastructure planning and implementation may be disproportionate, or not shared equitably, across the state.

These members highlighted the cost burden to rural and regional ratepayers. Mechanisms are needed to minimise the potential for this inequity to occur and this challenge could be highlighted within the Strategy.

- The concern regarding high financial burden to ratepayers in driving some infrastructure development activities is also shared by some metropolitan councils. For example, those councils in areas that bear a heavy load in current and future planned greenfield development such as Playford, Gawler and Mount Barker.

The LGA also notes that the eight South Australian boards of Regional Development Australia (RDA) are currently undertaking a prioritisation process to identify key infrastructure projects and studies across regional South Australia.

The aim of this process is to help governments and industry focus on progressing vital projects that will make the greatest impact in terms of economic growth and community liveability. It is understood that the prioritised list, once completed, will help inform a range of planning and investment decisions.

Given the unique connected placement and partnership of the RDAs to all levels of government across Australia, their insights into prioritisation of projects will be an important tool to assist in fostering closer ties to deliver infrastructure projects that regions need and want.

Along with tangible objectives and targets that the LGA would like to see articulated through the Strategy, the development of a prioritisation agenda needs to engage with and send a message to the market around key targets to aim for through infrastructure development.

Affordable housing

When considering what actions are needed to support sufficient, fit-for-purpose housing, the Strategy needs to consider an emphasis on design quality and housing design that encourages built form outcomes that are environmentally responsive and consider the long-term running costs for dwellings (not just short-term building costs).

Councils also noted:

- The proliferation of low-quality housing in both greenfield and infill development that purport to be 'affordable housing' belies the ongoing costs to residents in heating and cooling costs in the long term. Educating about and incentivising or supporting comparatively low-cost improvements can make a difference, for example, lighter roofing colours, high quality insulation, solar orientation (where installed) and tree canopy retention.
- Effective measures to improve energy efficiency could be achieved by improving the Planning and Design Code to improve passive design and climate change aspects (and greening) and appropriate resourcing to ensure these are enforced. The introduction of a sustainability rating assessment tool into the planning system would assist in supporting home builders, homeowners and relevant authorities and provide resilient housing for our changing climate.

In addition, it is noted that often a key barrier to growth for many regional towns is access to affordable housing. The LGA is pleased to be working with the Office for Regional Housing (at Renewal SA) on this issue.

The LGA's SAROC commissioned research into the major barriers preventing the development of regional housing. After extensive consultation with developers, the building industry, and councils, the following barriers were identified:

- Trades and material shortages in regional areas – exacerbated by a global pandemic.
- A shortage of qualified planners, engineers, and other experts to assist councils to support development in a liveable manner.
- Affordable access to utility connections, such as power, water and sewage.
- Difficulties in developers and home buyers securing housing finance (including the application of high loan-to-value ratios).
- Absence of economies of scale in many regional housing markets increasing building costs, costs associated with the extension or establishment of essential services infrastructure.
- Insufficient resourcing or expertise in regional councils and with other stakeholders to conduct detailed regional housing supply and demand audits and connect this data with commercial partners capable of delivering residential housing projects.

To address these regional barriers, the LGA is strongly supportive of the pilot program being established by the Office for Regional Housing that will see more than 30 new homes built for essential workers across regional South Australian towns. This will provide benefit to the areas of Mount Gambier, Port Augusta, Ceduna, the Riverland and the Copper Coast.

Houses delivered under the scheme may be sold to private investors under long-term lease arrangements and the construction of these homes is expected to reduce pressure on the private rental market. The learnings generated through the pilot will help the State Government understand how best to scale up and expand this scheme to other regions across the state.

To support this program, the LGA is currently consulting with the Office for Regional Housing on a 'Regional Housing Toolkit' for councils. This toolkit will provide guidance on how to advance housing development proposals for assessment through the Office for Regional Housing and Housing Australia. When finalised, this toolkit will be made publicly available via the [LGA website](#).

Public transport

Noting that the Strategy Discussion Paper articulates that the transport sector represents 29% of South Australia's total emissions, a significant amount feedback was received from members around the need for a more coordinated approach to integrated and mass public transport options for identified major growth areas.

Examples provided by members that articulate this dire need for transport infrastructure provision include:

- The Town of Gawler suggesting transit nodes be embedded at every major greenfield development; pointing to the success of the O-Bahn servicing Golden Grove, and central rail access in Mawson Lakes as demonstrative models that have worked previously.
- In the case of Playford Council, it advises that with the exception of the Riverlea Park Housing Estate residential development, no consideration has been made for public transport in its council, despite being one of the key areas identified for new land supply to support urban growth. This has the effect of creating and maintaining car dependent communities, which will impede the transition of transport to net zero.
- The lack of public transport options in the Rural City of Murray Bridge is a significant barrier to supporting growth into this location. Suitable public transport has been identified by this council as

an immediate and pressing infrastructure need for Murray Bridge to support its recognition under the GARP as a satellite city. Public transport connection from Murray Bridge to Adelaide City through the Adelaide Hills could also open up further parcels of land to support growth and employment opportunities through these locations. The need for transport provision could also expand to the wider region around Murray Bridge, including the locations of Mannum and Taillem Bend.

South Australia, and in particular Adelaide, is unlikely to become less car-dependent in the next three decades without substantial infrastructure investment. While this development should not be fully at the expense of existing infrastructure for those who have limited options but to utilise a car, some councils observed that the Strategy Discussion Paper did not adequately emphasise infrastructure provision for walking, cycling and other active transport, and/or forms of micro-mobility. Particularly for the metropolitan context, and centralised satellite hubs, along with integrated and mass public transport, these aspects will be a key lever in moving towards decarbonisation of transport, as well as making our cities more attractive and liveable.

Health and wellbeing

Local government recognises federal and state governments have a responsibility to provide quality health care and that council's role is limited to local or regional preventative public health activities. Councils have committed to liaising with federal and state governments to maximise the benefits of community preventative health activities offered.²

Research suggests that the social infrastructure of a community shapes its social capital. This refers to the programs (such as volunteer organisations, sports and religious groups and associations), policies (like public transport, housing and education) and physical elements of a community (such as libraries, parks, green spaces and playgrounds) that facilitate bringing people together.

The City of Charles Sturt was recently awarded a Highly Commended Council award at the recent Minister for Health and Wellbeing - Excellence in Public Health Awards for Ngutungka (place of knowledge) library hub. This facility is a vibrant, attractive and modern community hub that will enhance the connections and creativity within their community. It is a next-generation, integrated community place that is recognised as a centre of excellence for literacy, learning, innovation and discovery.

This is one example where local councils play a pivotal role in building community resilience through creating safe, equitable and respectful public environments, such as community centres, sporting clubs, libraries, parks and playgrounds; and providing the opportunities for participation and social connection through programs and services that support residents across all life stages.

Investment in local institutions that bring people together and promote social connection needs to be supported. However, many councils do not have extensive budgets to support action in this area.

The LGA membership notes measures that can reduce the long-term burden to our health system and support health and wellbeing outcomes include:

- Accessible and walkable tree-lined streets. Retention and growth of tree canopy and green 'infrastructure' provide active cooling as our climate changes and encourages being outdoors.
- Prioritisation of infrastructure to support physical activity and opportunities for connection and socialisation at the local community level. This can be achieved through the provision of quality,

² [LGA Policy Manual](#) 3.1 Public Health | LGA South Australia

attractive open spaces, as well as recreational, cultural and sporting facilities that are safe and suitable.

- An increase in investment to support councils to upgrade dated community social infrastructure to ensure that these facilities are accessible and inclusive for all ages and abilities.
- An increase in investment in digital infrastructure in regional areas to support telehealth technologies.

Additionally, everyone has the right to feel safe through their travels – whether walking, riding a bike, or catching public transport. Councils are recognising that for women and gender-diverse people, perceptions of safety are particularly important. Feeling unsafe often leads to changes in behaviour – avoiding travelling alone at night, avoiding public transport, or even refraining from going out at all. This cautious behaviour can profoundly hinder access to opportunities.

Local governments around Australia are seeking to enhance safety and inclusion for diverse residents. For example, the New South Wales ‘Safer Cities Program’ has provided evidence backed research to toolkits and other resources to address safety in cities and towns. The City of Marion has also commenced work in this area, through their [‘Safe Space Project – Report 2022-2026’](#).

Again, to support positive health and wellbeing outcomes, inspiration could be drawn from the Victorian model of [20-minute neighbourhoods](#) which aims to support safe, accessible and well-connected places with thriving economies.

Childcare

The LGA notes that in October 2022, the State Government established a Royal Commission into Early Childhood Education and Care (the ECEC Royal Commission). Among other findings and recommendations, the [ECEC Royal Commission’s Report](#) again confirmed a widely acknowledged experience in the community regarding the lost economic benefits because parents, in particular women, are unable to participate in the labour market at their preferred level. The report also commented that the Commonwealth’s Child Care Subsidy currently underpins the overall functioning of the early childhood education and care market. While it has successfully increased access in a range of areas, it has been unable to ensure universal availability of early childhood education and care, particularly in the regions.

The [Grattan Institute](#) has also commented that *“Boosting women’s workforce participation is one of the biggest economic opportunities for the Australian Government. And making childcare cheaper is the biggest policy lever available to reduce barriers to women’s workforce participation and support women’s long-term economic security. Making childcare cheaper will also enable more children to receive the benefits of early learning and care.”*

The Strategy needs to acknowledge the role of infrastructure development as part of the approach to improve statewide access to early childhood education and care. Further, that this will have the potential for a significant positive impact across South Australia. This flow on benefit will be multifaceted, from boosting the talent pool for skilled workers to driving economic development and creating social cohesion and connected communities.

An example of where a market failure in this field prompted local government to step in was in Streaky Bay. Through community consultation, council identified within its Strategic Management Plan to support and investigate future childcare facility arrangements. This process resulted in the recent opening of a new facility, which provided jobs to local childcare workers as well as catering to

significant local demand for child care placements to support other working families stay in local employment across a range of technical skills and trades, including healthcare professions.

Education and skills

In ensuring that South Australia is well equipped with the resources to enable growth, productivity and prosperity, access to higher education and training will be important over the next 20 years. Councils noted that higher education and training is concentrated in Adelaide City and metropolitan areas. This is resulting in tertiary education attainment levels to be lagging, even where population of some regions is burgeoning, such as Adelaide Hills, Fleurieu Peninsula and Kangaroo Island.

Supporting educational opportunities for regional and remote students, including Aboriginal and Torres Strait Islander students and those with a Culturally and Linguistically Diverse background, to develop a locally skilled workforce, retain young people in their communities and drive vibrant local economies is a critical priority for these regions.

The Strategy supports the need for opportunities for universities, TAFE and other education facilities to establish regional innovation hubs, specialty research centres, and employment and technology parks in regional centres, especially in areas of current or predicted future high growth. This will provide a range of statewide educational access points to support students in reaching their potential and retain knowledge and skills within the local economy.

Recommendations – Objective 2

9. To be effective, the Strategy needs to be closely aligned to objectives of the GARP. Alignment across the Strategy and regional planning is also required when the SPC commences its proposed program of consultation on regional plans with the six country regions in 2024. Consideration also needs to be given to other long-term infrastructure plans currently under development outlined earlier under 'General Recommendations'.
10. The Strategy needs to support a framework that guides future targeted infrastructure investigation. For example, detailed infrastructure investigation will be required for the identified growth areas in the GARP (and other regions once established), including engagement and collaboration with the growth area councils to ensure that future infrastructure can be delivered in a coordinated and timely way.
11. The Strategy could consider a role for infrastructure delivery schemes, in accordance with the *Planning, Development and Infrastructure Act 2016*, and councils to ensure fair and reasonable developer contributions for greenfield, strategic infill and general infill are being made. With these contributions providing the funding to deliver infrastructure in accordance with the schemes such as larger stormwater pipes, playground equipment etc. As a model, Victoria has established infrastructure contributions that are supported by infrastructure planning to determine developer contributions.
12. The LGA recommends that Infrastructure SA continues to engage with the RDA boards to ensure that the Strategy shows strong alignment with the South Australian RDAs list of prioritised infrastructure projects once determined.
13. To support long term affordable housing solutions, the Strategy needs to provide a greater focus on design quality and housing design that promotes greater emphasis on environmental responsiveness and considers the long-term running costs to residents for dwellings constructed.

14. The Strategy needs to highlight the importance of pilot programs such as the Regional Key Worker Housing Scheme. These programs demonstrate a model for successful State-local government collaborative partnerships and how together, governments can help secure long-term access to new, fit-for-purpose and affordable housing in the regions.
15. Challenges such as skills shortages and absences of economies of scale for some housing markets is a key barrier to economic growth and must be addressed if the Strategy is to succeed over the proposed 20-year term.
16. The Strategy must highlight greater focus on an integrated transport network that promotes and encourages the use of public transport and active/pedestrian modes of travel. It also needs a more considered and coordinated approach to mass transport options for identified major growth areas, for example Murray Bridge and Playford council areas.
17. Recognise in the Strategy that investment in social infrastructure will lead to more equitable and socially cohesive places. This development needs to be targeted to those areas that currently lack integrated social infrastructure planning, for example through a rapid growth trajectory that has created islands of urban development that are not adequately supported by access to social infrastructure.
18. The Strategy needs to acknowledge the role of infrastructure development in improving statewide access to early childhood education and care. The flow on benefits will be multifaceted, from boosting the talent pool for skilled workers to driving economic development and creating social cohesion and connected communities.
19. Support opportunities through the Strategy for regional education hubs to decentralise education and training, with the aim of keeping students connected in their communities and to build capability and capacity in the regions to support the growth agenda.

3. Accessible and inclusive infrastructure supports social inclusion and economic participation.

Regions

The LGA is aware of the recently completed federally commissioned Independent Strategic Review of the Infrastructure Investment Program (IIP Review). As a result of the recommendations of the IIP Review, the Federal Government announced decisions to no longer provide funding at this time to the following projects in South Australia:

- Hahndorf Township Improvements and Access Upgrade
- Main South Road Productivity Package
- Old Belair Road upgrade, Mitcham
- Onkaparinga Valley Road - Tiers Road - Nairne Road Intersection Upgrade
- Truro Bypass

The relevant affected councils are understandably deeply disappointed by this funding loss, with both the Mount Barker District Council and Mid-Murray Council making public statements about how this announcement will impact their local communities. The commentary of these councils highlighted how infrastructure delivery has lasting impacts on local communities, in potentially delivering road safety benefits, improving freight movement outcomes, enhancing tourism and cultural activities, promoting economic growth, and enhancing liveability and social inclusion.

The IIP Review (page 34) noted that maintenance is a broader issue for asset owners, and demand for maintenance and renewal will continue to increase in the face of increased pressures on the road network associated with transition to net zero and impacts of climate change in extreme weather patterns.

The LGA notes that the IIP Review made six recommendations that have direct impact to the local government sector. These are outlined in the Executive Summary to the IIP Review and are numbered as recommendations 2, 7, 8, 9, 10 and 11.

On balance, the LGA supports the recommendations of the review, noting the initial Federal Government response to the IIP Review shows that some of these recommendations have been accepted and further commentary on this has been included earlier in this submission.

However, it is noted that more detail needs to be provided on the extent of adoption of those initiatives that have been announced. Pending this information, the LGA may provide a more nuanced view of likely benefits and challenges to the sector of the proposed changes to infrastructure planning and funding pathways.

If the Federal Government is to adopt more of the IIP Review recommendations, there may be significant changes to a range of processes such as funding access, planning and reporting requirements. The local government sector is a willing partner and intends to play a constructive role in processes that will unlock fair and equitable opportunities for the sector. However, where possible, efforts should be streamlined to ensure best value is realised and as far as practicable, reduce duplication across layers of government.

Regional and remote areas

The Grattan Institute report on local road infrastructure cited above, highlighted what our members have been experiencing in practice when it comes to funding of road maintenance activities:

- Regional and remote Australians already face a high rates burden.
- The under-spend on road maintenance is much greater in regional and remote areas.
- Regional and remote councils manage vast road networks with limited scope to raise revenue.

The regional requirements are nuanced, and must include capability, capacity and funding for local road infrastructure maintenance. For example, the Yorke Peninsula Council has previously called for increased federal funding as this is essential to the safety and productivity of local roads. With nearly 4000 kilometres of roads (not including Federal and State Government-owned roads) situated within the district, Yorke Peninsula Council understands how vital these roads are to the community. In the 2022-23, they had almost 530,000 visitors, which again highlights the importance of a smooth and safe drive in the region. This investment is not just about a smoother drive, it is an investment in economic health, safety, and overall wellbeing.

In addition to road asset maintenance activities, our rural and regional membership also report inadequate local resourcing to maintain and improve local building asset infrastructure, for example buildings and sites of historic or cultural importance. Noting that in many cases, these facilities provide the social infrastructure that regional townships need to ensure liveable and connected communities.

Along with costs of everyday business as usual works, and in many cases a low-rate base, regional and remote areas are inherently challenged in delivering a full range of the asset maintenance and renewal functions without access to funding and grant schemes that are targeted to these localities. In

many cases, this means that tough decisions are having to be made in terms of prioritisation agendas for tight budgets.

Closing the Gap

Local government acknowledges and recognises Aboriginal and Torres Strait Islander people as the First Peoples of Australia and respects their culture and practices. Councils, along with federal and state governments need to make an ongoing commitment to working together to provide services to support Aboriginal and Torres Strait Islander communities.³

The LGA supports action in Closing the Gap and notes the commentary in the Strategy Discussion Paper relating to community infrastructure targets and essential service provision aligned with achieving Closing the Gap targets. The LGA also cites relevant commentary within this submission that address matters relating to Closing the Gap targets across the Strategy's proposed objectives.

Governments at all tiers need to seek ways to better understand the services and infrastructure that will support Aboriginal and Torres Strait Islander people and communities in culturally safe and appropriate ways. This includes provisioning for education and community capacity building, as well as acknowledging the need to extend beyond infrastructure provision and delivery. For example, facilitating access to land can support building of sustainable business models (e.g. cultural and tourism perspectives) or social entities supporting knowledge sharing opportunities (e.g. community and social inclusion perspectives).

Recommendations – Objective 3

20. Note the recommendations made by the IIP Review, particularly those that relate to the local government sector. The LGA provisionally supports these recommendations noting the Federal Government has already announced acceptance of some of the IIP Review recommendations. The LGA notes that some of the recommendations would require strong partnerships between State and local government to be able to deliver these effectively and would welcome further opportunity for consultation on the further adoption of any of the IIP Review recommendations. The Strategy should seek to reinforce the fostering of strong partnerships regardless of whether the Federal Government intends to accept more of the IIP Review recommendations.
21. Note the challenges faced by rural and remote communities in providing adequate infrastructure maintenance and renewal. The Strategy needs to highlight a need for equitable funding access to ensure these communities remain connected to the rest of the state.
22. The local government sector would welcome opportunities to work with the State Government on achieving Closing the Gap targets and supports the delivery of state infrastructure that is culturally safe and appropriate and builds the capacity and capability of Aboriginal communities. This can be achieved by providing funding opportunities to support councils in upgrading and renewing infrastructure with a cultural lens, in partnership with local Aboriginal organisations.

³ LGA Policy Manual 3.4.7 Aboriginal and Torres Strait Islander People

4. Infrastructure supports a decarbonised, sustainable economy that capitalises on our competitive advantages and opportunities.

Decarbonisation

The ability of governments and private organisations to account for embodied carbon is a major gap in transitioning to a net zero future, because we do not have a clear understanding of the carbon emissions associated with the use of specific products and processes. Local governments are developing carbon neutral commitments and plans and are interested in reducing exposure through transitioning to low-carbon alternatives. High-carbon products such as bitumen, cement and steel are a major priority for the sector, so better understanding their embodied carbon and how emissions could be reduced by transition to green steel is critical.

The local government sector is aware that the State Government is focusing on the development of local capacity to produce green steel, which is an encouraging development. We need to ensure that this capacity is directed at domestic needs to meet our local infrastructure demands before excess is exported.

The LGA secretariat notes that according to the export chart shown on page 12 of the Strategy Discussion Paper, fossil fuels (coal, oil and gas) are not listed and query whether this may be included in the 14% 'confidential items'. Greater transparency of the amount of South Australian fossil fuels that are extracted and exported will enable better understanding of true carbon neutrality status, by taking into consideration fossil fuels that will be burnt elsewhere.

The Strategy should be clear in prioritising carbon reduction efforts in the following order:

- a) Avoid emissions through not undertaking unnecessary or duplicate projects.
- b) Minimise emissions through project design, material selection and process.
- c) Offset carbon emissions through local projects.
- d) Offset carbon through projects not in South Australia.
- e) Carbon capture and storage.

It is essential that carbon capture and storage be the last resort to achieve net zero emissions.

South Australia has achieved impressive levels of renewable energy generation, in part due to high uptake of domestic solar panels. The LGA supports the continued rollout of domestic and small- and large-scale commercial capacity.

Local government has a role in educating the community regarding domestic solar opportunities, and the LGA is currently exploring the opportunity to develop localised virtual power plants that aim to support delivery and assist with managing distributed energy networks. For example, the City of Mitcham has established a 'Community Renewables' program as a way to harness renewable energy from the local community, reducing electricity costs and supporting grid stability to reduce incidence of blackouts.

This is a new area for local government and sharing of experiences, establishment of clear governance and procurement procedures will be important to ensure all due diligence is met and fully understood by the local government sector.

Circular economy

Transitioning towards a more circular economy is necessary for South Australia to achieve its net zero emission targets. At the LGA Ordinary General Meeting (OGM) on 14 April 2023 (item 8.2), the LGA member councils voted to formally recognised the climate crisis and declared a Climate and Biodiversity Emergency.

Councils acknowledge that urgent, ambitious and immediate action is required at all levels of government to address the climate crisis by reducing emissions. Further, they are committed to advancing waste management practices to provide high quality, innovative and sustainable waste management services that comply with environment protection requirements and support the transition towards a more circular economy.

To achieve national carbon emissions targets, South Australia needs to reduce the amount of material and products consumed and progress its transition towards a more circular economy.

It is understood that 45% of global Green House Gas (GHG) emissions can be attributed to 'products'; the production of materials, products, and food (including the management of land). The remaining 55% of global GHG emissions are attributed to energy systems and energy for buildings and transportation.

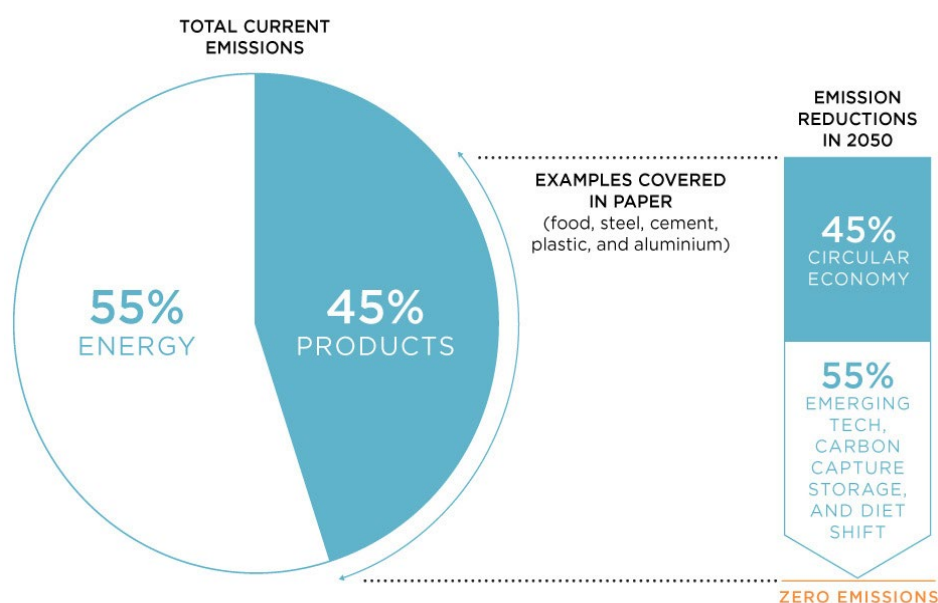


Figure 2: Ellen MacArthur Foundation, "Completing the Picture: How the Circular Economy Tackles Climate Change" (2021)

Figure 2 shows that in addition to reducing emissions from energy systems, meeting climate targets will require South Australia to tackle emissions relating to 'products' to address the remaining 45%.

Transitioning towards a more circular economy is a key action to tackle emissions relating to 'products'.

Transitioning towards a more circular economy is more than just improving waste management and recycling processes (although these are an integral part). Achievement of a circular economy requires a fundamental change in material consumption.

The foundations of a circular economy include avoiding creating waste, maximising material usage over multiple lifetimes and extending the use of materials (refer Figure 3). The '10 Rs of the Circular

Economy' represent various strategies that can be employed to reduce product generation, noting that recycle and recovery are at the end of the lifecycle of the material/product process.

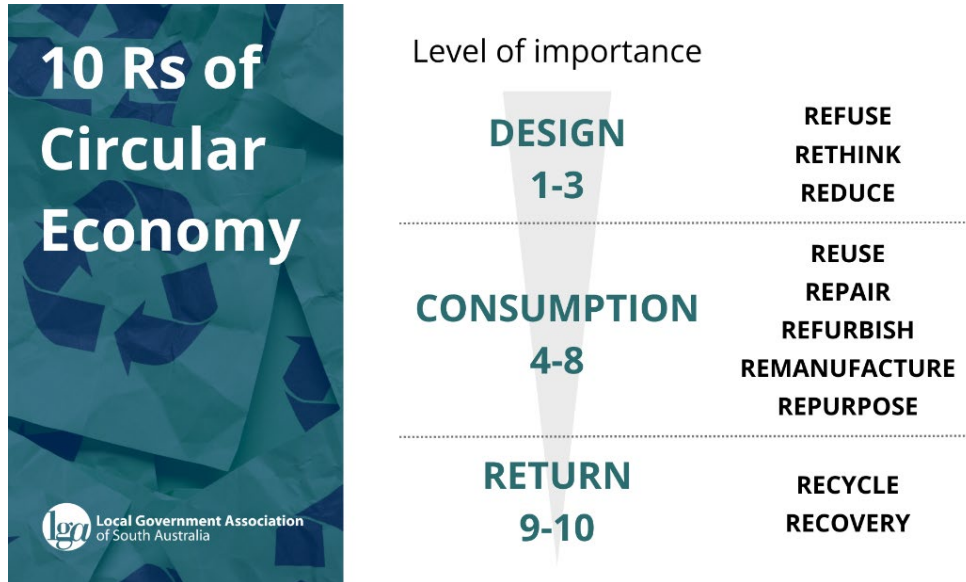


Figure 3: 10 Rs of the Circular Economy

A change in the way we approach infrastructure design is required. Better utilisation of existing materials, ensuring materials are reusable and can be recycled and recovered in a way that produces high quality secondary raw materials is needed to transition towards a more circular economy. This requires industry and project developers to consider end-of life options for materials at the outset of a project as well as increased coordination and project planning.

This model aligns with the international shift towards product stewardship principles and current Federal Government proposals in relation to end-of-life management of large-scale solar photo-voltaic systems. The Federal Department of Climate Change, Energy, the Environment and Water recently consulted on their discussion paper for the regulation of these products.

As the owners and operators of major waste and recycling infrastructure across South Australia, local government is left with the responsibility of the 'end-of-life' options for a wide variety of materials which can be low-value, contaminated and/or hazardous. The costs, financial and otherwise, of this material management is left with councils, and by extension ratepayers, not those who benefited from the material use during its lifetime, nor those responsible for the waste generation.

Australia's waste, recycling and resource recovery sector has experienced significant shifts beginning with the China National Sword policy introduced in 2018 and the introduction of Australia's waste export bans through the *Recycling and Waste Reduction Act 2020* (Cth). This has resulted in sizable fluctuations in the commodity markets for recyclate. Challenges establishing onshore market capacity for recycling and reprocessing has further compounded these challenges. It is understood that to increase the market demand for secondary raw materials that are being produced, the quality and recyclability of material being utilised in the first place needs to be improved.

These challenges have substantially increased councils' costs associated with waste and recycling.

To support the development of onshore commodity markets for secondary raw materials being, industry needs to consider design and consumption principles at the outset of projects to avoid waste generation and enable circularity of materials. In addition, new infrastructure should prioritise reuse of materials and use of recyclate (where appropriate) in projects to support end market development of materials.

Achieving economies of scale for some waste material streams is a challenge for South Australia. Investment in strategically located infrastructure and processing facilities that enable recovery of materials is necessary for material circularity and to ensure the viability of recycling.

Recommendations – Objective 4

23. The LGA notes the significant gains South Australia has already made by increasing renewable energy generation, these efforts are supported by members. To reach net zero, carbon accounting, including embodied carbon, must be standardised and clarified. Further, carbon reduction efforts need to be prioritised in such a way that carbon capture and storage are considered a last resort.
24. The inherent challenges and cost to the local government sector in managing existing end-of-life activities for materials and products must be acknowledged. Transitioning to a true circular economy will require partnership at all levels of government to:
 - Look for ways to stabilise the recyclate commodity market, such as by regulatory methods, or assisting in sourcing new and emerging markets for this product.
 - Work to improve the life-cycle management of materials and products, increasing their quality and desirability for further uses.
 - Embed the circular economy concept into infrastructure planning as a fundamental aspect of design, using incentives or other policy levers to drive this shift.
 - Invest in strategically located infrastructure and processing facilities to enable sufficient recovery of materials for circularity and to ensure the viability of recycling.

5. Improved resilience to shocks and events helps avoid or respond to disruptions that impact our economy, services and supply chains.

Planned resilience

In making South Australia prosperous, liveable and adaptable means planning our resilience in the face of the climate change ‘megatrend’. As identified in the GARP, the LGA shows strong support for the guiding outcome to provide greener environments. However, changes to current policies will need to be made to ensure the outcomes can be achieved in current and proposed residential densities in built-up areas. Aligning planning policy with these goals may be difficult, as policies favouring fast-tracking greenfield developments may contradict the intent of creating a greener environment. There needs to be stronger overall strategy in relation to protecting existing vegetation and tree canopy, as well as recognising that tree canopy targets cannot be met without trees on private land.

Climate resilience is an extremely important outcome and one that should be given significant weight in both the Strategy and the GARP. A focus on climate mapping that would, amongst other things, identify areas impacted by rising sea level and ensure housing built today is designed to accommodate climate change and the forecast environment in 2050 and beyond.

In planning for a more climate resilient future, partnerships must be fostered between governments and communities to look for ways to embed the traditional ecological knowledge of Australia's First Nations people. This must be done in a culturally safe way, ensuring consultation and inclusion is maintained from conception to decision making. The Strategy could look towards the guidance of South Australia's First Nations Voice to Parliament once established, to seek meaningful ways to set actionable policies to support the utilisation of Aboriginal and Torres Strait Islander land management processes that can enhance resilience of the Australian environment.

It is noted that the Strategy will span a period of expected changes to the South Australia's climate, including that it is becoming hotter and drier, and experiencing extreme events like heatwaves, bushfires and flooding, which are increasing in frequency and intensity. Infrastructure in South Australia must increase its resilience to able to withstand these changes over time.

In addition, the LGA has been working with Green Adelaide to support the development of its Urban Greening Strategy and eagerly awaits its release early in 2024. The LGA is specifically concerned about the impact on urban greening which is posed by the activities of SA Power Networks (SAPN).

At the LGA Annual General Meeting (AGM) on 26 October 2023 (item 8.1), the LGA member councils voted to support the following item of business:

"...coordination and advocacy to reconcile the Electricity Regulations, which suppress canopy coverage, with state government targets set to increase canopy coverage."

To progress this matter, the LGA has written to the Hon Tom Koutsantonis MP, Minister for Energy and Mining, to advocate for a review of the Electricity (Principles of Vegetation Clearance) Regulations 2021 (the EPVC Regulations) to address the following matters:

- The barriers imposed by the EPVC Regulations to the state achieving its urban greening agenda.
- The need to accommodate existing trees.
- The need to review the list of allowed and permitted species (which form part of the EPVC Regulations) to facilitate the urban tree canopy.
- The need for the Office of the Technical Regulator to take a stronger leadership role in administering the Regulations, rather than deferring to SAPN.

Along with members, the LGA is committed to continuing to work with SAPN to resolve issues related to the existing conflict between SAPN needs to preserve vital power networks and the state's urban greening agenda.

However, electricity infrastructure is one of the most suppressive influences on growing tree canopy on public land due to the requirements imposed by the EPVC Regulations. In particular overhead powerlines, and allowed and permitted species lists are significant impediments to councils achieving adequate canopy cover to build capacity and resilience in our communities as the climate changes.

Food security

When consulting on the response to the GARP discussion paper, the LGA received feedback from members about food production areas and food protection/security. The Environment and Food Production Area (EFPA) is intended to protect land from urban development. Interestingly the EFPA does not capture all of the land that has been identified by the Department of Primary Industry and Regions as primary production priority areas (refer Figure 4). This is also the case for areas in The Barossa Council, Adelaide Hills Council, Light Regional Council and the City of Onkaparinga.

The protection of primary producing lands and food security serve multiple purposes including:

- Achieving the aspirations of living locally.
- Ensuring that there will be food security and adequate food supply to support a growing population.
- Supporting the state's net zero emissions target by growing and using food within the state for example, reducing emissions due to reduced food miles.

The Strategy and GARP need to show an alignment that supports the preservation of land that is best suited to primary production activities within the changing climate and the forecast environment in 2050 and beyond.

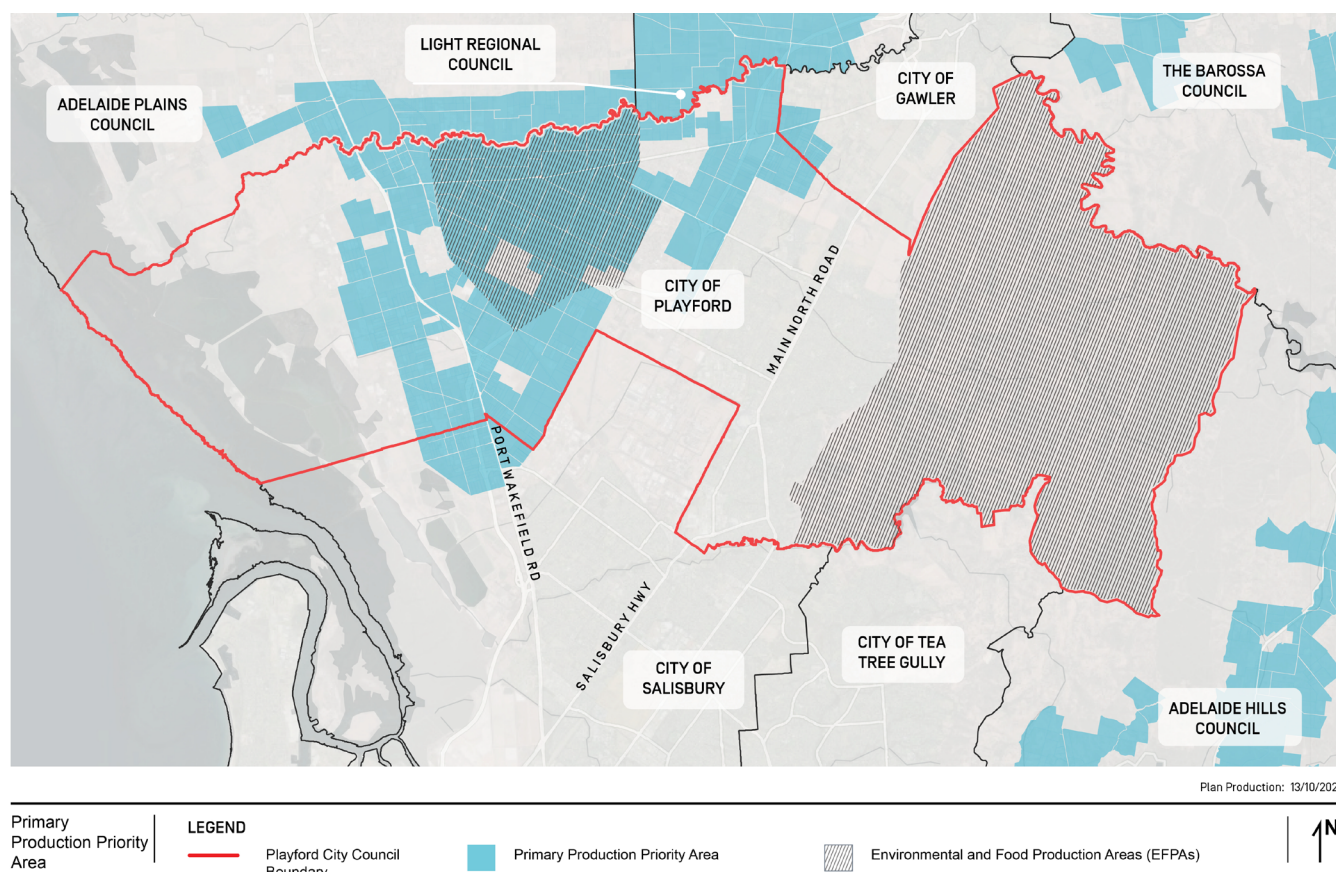


Figure 4: Environment and Food Production Area and Primary Production Priority Areas in the City of Playford

Recommendations – Objective 5

25. Available climate data should be considered to minimise the vulnerability of future development from climate change. This could be achieved through mapping current climate data and identifying areas that are likely to experience increased risk of hazards. This should also be considered in the investigation of growth areas. For example, identifying areas likely to be impacted by sea level rise over this century, such as the Riverlea Park Housing Estate which is four metres above the current sea level and will need to manage sea level rise that is already impacting underground water, forcing it to bubble up to the surface.
26. The Strategy could look towards the guidance of South Australia's First Nations Voice to Parliament once established, to seek meaningful ways to set actionable policies to support the utilisation of

Aboriginal and Torres Strait Islander land management processes that can enhance resilience of the Australian environment.

27. The Strategy could highlight the inherent conflict between the urban greening agenda, which will help us mitigate the significant effects of climate change, and the management and control of vital energy transmission infrastructure in South Australia.
28. The Strategy should note and plan for protection of lands to ensure adequate suitable provisioning for food production areas and food protection/security.

6. A stronger infrastructure industry optimises our infrastructure investment through better planning and prioritisation.

Workforce and labour

As identified earlier in this submission under ‘affordable housing’, the LGA’s SAROC commissioned research into the major barriers preventing the development of regional housing. One of the biggest barriers is the current and worsening shortage of skilled workers in a range of key areas. If this is not alleviated, South Australia will be prevented from realising the full potential of the proposed broad economic and growth agenda outlined by the State Government.

When this information is read in conjunction with other commentary under ‘education and skills’, it is clear there is a desire at the local government level to unlock decentralised training and education centres and hubs to encourage skills development and worker retention in regions once workers are adequately trained.

There is significant time required for investing in upskilling the next generation of the workforce. Depending on the field, in some cases this training could take years to mature, from the inception of curriculum to the first graduates coming into the workforce. Therefore, to ensure that existing skills shortages are not exacerbated, the planning work on upskilling these workers needs to start now and be prioritised.

In addition, consideration could be given to more dynamic education and training programs such as apprenticeships for those fields (unlike traditional trades such as plumbing, electrical and carpentry) where this type of education has not previously been available. For example, in urban planning roles where there is currently an acute shortage of workers.

Sustainable procurement

The local government sector acknowledges that all purchasing practices have the ability to deliver outcomes beyond the simple delivery of goods, services and works. Sustainable procurement is an approach to assessing ‘total cost’ of purchasing, including economic, social and environmental costs (‘triple bottom line’). Traditionally, economic cost has been the key consideration in procurement, but this is evolving towards a ‘triple bottom line’ approach as procurement practices increase in sophistication.

With annual expenditure of nearly \$1 billion on goods, services and works, the local government sector in South Australia has a key role in delivering sustainability outcomes and objectives.

Noting that many environmental impacts occur before a good or service is procured, for example, resource extraction, design development, manufacturing, transportation and storage. As large purchasing bodies, State and local government can minimise the environmental impacts of these procurements by influencing supply market practices.

Combined with the commentary outlined under the ‘circular economy’ heading above, prioritising procurement and use of goods and materials (where practicable including recycle) that are from sustainable sources will be integral in achieving the economic growth agenda that the State Government seeks. This will be supported within environmental sustainability parameters that the community increasingly expects governments to strive for and be market leaders in.

Recommendations – Objective 6

29. The Strategy needs to prioritise the importance of upskilling the workforce and skilled worker education and training which will unlock the potential for further economic growth in South Australia. In addition to training, consideration needs to be given to incentives and other benefits to attract and retain workers in areas of current and proposed high growth. This could be combined with investigating decentralising education and training centres to offer greater statewide education choices.
30. The Strategy needs to highlight the role of State and local governments in supporting best practice principles in relation to sustainable procurement.

Conclusion

As outlined in this submission to the Strategy Discussion Paper, the LGA recommends that the State Government consider ways to move towards greater integration on the development of key statewide strategies.

In addition, strong partnerships between State and local government will unlock potential to deliver meaningful outcomes, lower the costs for all governments, reduce duplication in building public infrastructure, enable better use of existing assets, and provide consistent and clear mechanisms for industry on funding of infrastructure projects.

Local government’s vision is for effective partnerships in infrastructure planning and funding that create productive, liveable and safe South Australian communities. To this end, the LGA welcomes further opportunities for productive and meaningful engagement with Infrastructure SA, and other relevant State Government bodies, as they work towards the development and delivery of the Strategy into 2024.

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