

Setting our future urban water directions

LGA Submission

October 2021

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Summary of LGA Submission

The Local Government Association of South Australia (LGA) welcomes the State Government implementing a key action from its Climate Change Action Plan 2021-2025, being to develop an Integrated Urban Water Management Framework.

The LGA recognises the importance of the research and consultation being undertaken through the Discussion Papers on Setting Our Future Urban Water Directions.

While it is not yet clear what an Integrated Urban Water Management Framework comprises, it is apparent that realising the opportunities presented in the Discussion Papers will require a coordinated range of policy, legislative and institutional measures. A clear roadmap for change outlining the next steps and timing is required to ensure opportunities are realised.

Local government anticipates ongoing involvement as a key stakeholder to contribute to and inform the State Government's approach to delivering improved water management in South Australia.

LGA key principles on urban water management

The following three key principles (articulated in the LGA Submission on Improving Flood, Levee Bank and Dam Management in South Australia (May 2019)) underpin the LGA's considerations in relation to development of an Integrated Urban Water Management Framework for South Australia:

1. Water management is a **shared responsibility** between all spheres of government, the community and landholders;
2. Successful water management requires **ongoing financial support**. Cost shifting or increased responsibility should not be placed on local government without commensurate ongoing financial and other support from the state government; and
3. The **information gathering, prioritisation and defining of responsibility in relation to existing issues is the responsibility of state government** in consultation with local government and other key stakeholders.

Introduction

The Local Government Association of South Australia

The LGA is the voice of local government in South Australia, representing all councils across the state and the Anangu Pitjantjatjara Yankunytjatjara. The South Australian *Local Government Act 1999* 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 feedback and comments to the Department for Environment and Water (DEW) in relation to its suite of Discussion Papers relating to the future of urban water in South Australia.

Setting Our Future Urban Water Directions

The South Australian Government Climate Change Action Plan 2021-2025 recognises the importance of ensuring secure, climate resilient regional and urban water supplies and includes the following action:

3.10. Develop a framework to deliver integrated urban water management and inform investment decisions

The government will develop an *Integrated Urban Water Management Framework* for all viable urban water sources. The framework will underpin management and investment decisions to meet community and economic growth needs in a hotter, drier future. The work will consider urban greening needs and stormwater management to minimise flood risk.

DEW has released a series of the Discussion Papers on Setting Our Future Water Directions, which the LGA understands have been prepared to support development of the Integrated Urban Water Management Framework.¹

The LGA welcomes this opportunity to provide a response to the Discussion Papers and congratulates DEW on its thorough approach to research and consultation.

The LGA has made the Discussion Papers widely available to its member councils.

This Submission has been informed by:

- existing policy positions developed through consultation with the LGA's member councils;
- feedback received from local government representatives who attended a DEW forum on the Discussion Papers that was hosted by the LGA on Friday 17 September 2021;²
- recent consultation in relation to other strategically relevant areas that fall within the scope of the Discussion Papers including water security, stormwater management, urban green spaces, flood, dam and levee banks, emergency management and climate change;³ and
- other submissions and discussion papers prepared by the LGA identified below.

Four recent LGA submissions that fall within the scope of the Discussion Papers are:

- LGA Submission to DEW on its Draft Water Security Statement 2021 (June 2021);
- LGA Submission to the Statutory Authorities Review Committee's Inquiry into the Stormwater Management Authority (February 2021);
- LGA submission to the Natural Resources Committee Inquiry into Urban Green Spaces (July 2020); and
- LGA Submission on Improving Flood, Levee Bank and Dam Management in South Australia (May 2019).

These submissions can be accessed through the LGA Submissions webpage. Key points from these documents are explored within this submission.

¹ South Australian Government Climate Change Action Plan 2021-2025, Action 3.10 (page 29).

² <https://www.lga.sa.gov.au/news-and-events/news/latest-news/last-chance-to-register-dew-forum-future-directions-for-water-management-in-sas-cities-and-towns>

³ <https://www.lga.sa.gov.au/news-and-events/news/submissions>

Background

Improved water management in South Australia has the potential to offer significant environmental, economic and social benefits to the State. Currently, a disparate and underfunded system compromises the efficiency of these systems and the ability of the State to prosper.

Local government in South Australia is a key stakeholder in the area of urban water management and plays an important role in water management and conservation. Some of the many activities undertaken by councils include:

- aquifer storage and recovery;
- wastewater and stormwater management;
- urban greening and development of wetlands;
- infrastructure upgrades, particularly in relation to irrigation infrastructure;
- operation of desalinisation plants;
- water efficiency or best practice demonstration projects (e.g., low water use garden);
- adoption of Water Sensitive Urban Design solutions for development and water efficiency measures as part of the development process;
- reuse of swimming pool filtration system backwash water;
- development of residential land development standards for best practice in water use;
- flood management planning; and
- community wastewater management systems.

Local government in South Australia makes a significant investment across this wide range of activities associated with water management. Between 2014-15 and 2018-19 metropolitan councils collectively spent an average of more than \$100 million per year providing and maintaining flood protection infrastructure.⁴

Councils recognise the importance of water for healthy and happy communities and for building a resilient community.

The importance of water management to the LGA and its member councils is evident from the number of submissions made by the LGA in recent years (see above).

LGA policy position on water management

Together with its member councils, the LGA has developed a Policy Manual based on robust research and evidence, to recognise the roles of local government and identify how local government can be an important partner in government.

Policy 4.3 Water Resource Management states as follows:

Local government recognises its obligation to conserve water resources, protect water quality, provide water for the environment and effectively manage storm and flood water. Councils shall contribute equitably to improving water management and infrastructure and processes, notwithstanding the responsibilities of federal and state governments.

⁴ DEW, Setting our future urban water directions, *Delivering integrated urban water management for the benefit of South Australia*, page 10.

National Water Reform

The LGA acknowledges that the development of the proposed Integrated Urban Water Management Framework coincides with the release of the findings from the National Water Inquiry⁵ and reflects a significant discourse at the national level.

On 2 September 2021 the Australian Government publicly released the Productivity Commission Inquiry Report on National Water Reform 2020 (“The National Water Reform Report”). The National Water Reform Report is an assessment of Australia’s progress towards achieving the objectives and outcomes of the National Water Initiative (NWI) and providing practical advice on future national water reform directions.

Chapter 12 of the National Water Reform Report explores Urban Water Services and makes key recommendations and findings in relation to the need for:

- all jurisdictions to develop agreed objectives for the urban water sector and include national principles for best practice in the planning, pricing and delivery of urban water services;
- performance monitoring and reporting;
- development of “basic level of water services” for all Australians; and
- principles for governance of regional and remote water services.

The National Water Reform Report also identifies specific opportunities which relate to the Discussion Papers around:

- water demand being met using fit-for-purpose supply sources rather than just potable water;
- wastewater providing a climate-independent source of fit-for-purpose water for a range of consumptive, amenity and/or environmental uses; and
- stormwater being managed in ways that keep water in the landscape and contribute to urban amenity, create urban habitat, improve the health of rivers and wetlands, reduce localised flooding and/or provide alternative sources of water supply.

This approach appears consistent with the Discussion Papers and the LGA urges DEW to ensure its approach aligns with the national approaches on water management.

LGA feedback to the Discussion Papers

This Submission does not respond to the specific and detailed questions provided in the Discussion Papers’ feedback form, rather feedback has been collated and in response to the overall introductory paper and each of the three Discussion Papers.

1. Water Supply for the Future – all options on the table;
2. Drainage and Flood Management – managing rain for the next century; and
3. Water for Life – water to support healthy and enjoyable urban living.

The Discussion Papers provide a solid evidence base to progress this issue. The Discussion Papers do not provide recommendations, so the LGA Submission responds to their general approach.

⁵ <https://www.pc.gov.au/inquiries/completed/water-reform-2020#report>

1. Water Supply for the Future – all options on the table

Integrated water management

The LGA welcomes working towards an integrated approach to water management in South Australia. This approach aligns with findings and recommendations of the National Water Reform Report that acknowledges that “An integrated approach can enhance the resilience of water systems by increasing the diversity of sources – potentially delaying the need for expensive augmentations of the water supply and distribution system.”⁶

The current approach has resulted in a myriad of differing structural and management standards across the State.

Disaster and climate resilience

The LGA, in its submission to the Natural Resources Committee’s Inquiry into Urban Green Spaces, recommended that “local and state government, in collaboration with key strategic stakeholders, work together to prepare a state-wide urban water strategy that considers opportunities to build community resilience to climatic and other disasters.”⁷

South Australia’s Climate Change Action Plan 2021-2025 identifies that South Australia will become hotter and drier, with more frequent and intense extreme weather events and that the state will experience more intense heavy rainfall events.⁸

We know that flooding is the most costly natural disaster in South Australia.⁹ It is a leading disaster risk¹⁰ with the average annual cost of damages from flooding in the state exceeding 32 million dollars.¹¹

Currently, the roles and responsibilities for water management, water infrastructure, emergency mitigation and response and recovery strategies are fragmented between landowners and state and local government.

Addressing the existing legacy issues, including issues associated with ownership of infrastructure and assets, is necessary to accurately identify risks and to ensure integrated water opportunities can be realised.

A bold integrated approach to water management is necessary to adapt to South Australia’s changing climate. The diversification of water sources, spreads the associated risks and can build the resilience of communities. Addressing existing legacy issues, clarifying roles and responsibilities for water infrastructure and ensuring commensurate ongoing funding sources is required for South Australia to adapt to the changing climate and to support resilient communities.

The LGA notes that South Australia’s Water Security Statement 2021 is currently being finalised which explores risks to water security associated with climatic changes. The LGA encourages DEW to consider a broad approach to water security that considers the importance of water in relation to culture, health and wellbeing and future threats to South Australia’s water security including microplastics, PFAS (Per- and polyfluoroalkyl substances) and water-borne diseases.¹²

⁶ Australian Government Productivity Commission, *National Water Reform: Productivity Commission Inquiry Report* (No. 96, 28 May 2021), page 165.

⁷ LGA Submission to the Natural Resources Committee Inquiry on urban green spaces, pages 3 and 6 < <https://www.lga.sa.gov.au/news-and-events/news/submissions> >.

⁸ South Australian Government Climate Change Action Plan 2021-2025, Action 3.10 (page 9).

⁹ Gary Burns, Leanne Adams & Guy Buckley, *The Independent Review of the Extreme Weather Event South Australia 28 September – 5 October 2016*, page xiii.

¹⁰ United Nations Office for Disaster Risk Reduction <https://www.unisdr.org/we/inform/terminology>

Note: Disaster Risk – the potential loss of life, injury, or destroyed or damaged assets which could occur to a system, society or a community in a specific period of time, determined probabilistically as a function of hazard, exposure, vulnerability and capacity.

¹¹ Gary Burns, Leanne Adams & Guy Buckley, *The Independent Review of the Extreme Weather Event South Australia 28 September – 5 October 2016*, page xiii.

¹² <https://www.lga.sa.gov.au/news-and-events/news/submissions>

Basic water needs

The National Water Reform Report explores the concept of establishing a “basic level of service”¹³ which specifies the minimum standard of key aspects of service provision available to all households.

To achieve the aims and realise the benefits associated with integrated urban water services, it is recommended that a broad view of public benefit of water is explored - extending beyond “the end of the tap” cost of water to the community. This broad view could consider how different water services benefit long term climate risk mitigation and adaptation actions (including public space and canopy considerations as well as broad health and wellbeing considerations).

In the development of Our Water 2020-2024, SA Water’s regulatory business proposal to Essential Services Commission of South Australia (ESCOSA), SA Water conducted customer research and engagement.¹⁴ This research indicated that customer values extend to a wide variety of considerations including protecting the environment and looking after the SA community as a whole.

A “basic level of service” could consider water benefits beyond drinking water. It is noted that a “basic level of service” may not be the same for all communities and consultation, education and communication with communities is necessary to ensure the unique needs of each community are met.

It may be beneficial to revisit the role of ESCOSA in order to reflect the broad economic benefits and aims outlined by DEW throughout these strategic papers associated with urban water.

Water Industry Act 2012 (SA)

Progression of the findings and recommendations of the review of the *Water Industry Act 2012 (SA)* is viewed by the LGA as a necessary element of an Integrated Urban Water Management Framework.

Investigations into the influence of pricing and price setting processes in supporting an efficient and competitive water industry that removes hidden subsidies that disadvantage smaller operators are recommended.

Further discussion around this topic can be viewed in the LGA submission on the draft Water Security Statement.¹⁵

Fit for purpose alternate water options

The LGA acknowledges the climatic, disaster and other resilience benefits alternate, innovative water options, like recycled water, present to the community. The LGA also understands that alternate innovative water options can only provide these benefits to communities if they are fit for purpose.

In determining if an alternate water option is fit for purpose, it is necessary to consider the:

- quality of the water in the context of its intended use (including any treatment required); and
- cost impacts (upfront capital investment and ongoing operating costs – including any treatment costs).

Consideration of the quality and operating costs associated with alternate water source are necessary considerations in determining if an alternate water option is fit for purpose and therefore viable to achieve the overall aims outlined in the Discussion Papers.

¹³ Australian Government Productivity Commission, *National Water Reform: Productivity Commission Inquiry Report* (No. 96, 28 May 2021), page 172.

¹⁴ <https://www.sawater.com.au/about-us/our-vision-and-strategy/our-plan-2020-24> (Appendix C – Our Plan Customer Engagement).

¹⁵ <https://www.lga.sa.gov.au/news-and-events/news/submissions>

Education and communication

The local government sector is aware that the combination of education, incentives and the speed of feedback to the community in relation to new or emerging water management practices are drivers of change and central to realising the opportunities of integrated water management.

The State Government, through its Climate Change Science and Knowledge Plan, has made a commitment to “Translate climate change science and information to foster its uptake and use in planning, risk assessment and decision making among a range of users.”¹⁶

There is opportunity to leverage new or updated climate change science and information to support community education associated with updated water use or practice recommendations relating to water.

Education of the community is central to achieving aims associated with integrated water management. If the community generally understands the “new” or emerging climatic risks faced by South Australia, different water usage practices, like urban greening or Water Sensitive Urban Design (WSUD) can be promoted to the community in this context.

Local government acknowledges additional sensitivities associated with flood risk data and is committed to working with state government to ensure information is communicated clearly to the community while protecting the interests of councils. It may be useful to learn from other jurisdictions approaches in relation to information sharing (e.g. Tasmanian Flood Mapping Project) and the liability and legal protections for government associated with this type of information.

2. Drainage and flood management – managing our rain for the next century

The Statutory Authorities Review Committee’s current Inquiry into the Stormwater Management Authority¹⁷ (SMA) may be able to provide valuable insights to be considered in this decision-making process, particularly around the strategic direction of the SMA. The LGA submission to this inquiry can be viewed on the LGA website.¹⁸

In addition, findings from DEW’s consultation on flood, dam and levee bank management (2019) may be able to provide direction in relation to flood mapping approaches to assist in educating the public about flood risk. In this submission the LGA notes that there may be opportunity to draw parallels from current state fire prevention regulation¹⁹ to ensure private landowners comply with established maintenance and management standards for levee banks. This concept could be explored further in relation to other strategic water infrastructure (stormwater).

Climate change

Climate change is predicted to put significant additional pressure on stormwater management systems and other water infrastructure across the state.

An increase of extreme rainfall events will increase the likelihood and intensity of floods and consequently, damage to stormwater infrastructure. Dry and drought periods are also predicted to increase, increasing the importance of alternative water supply options (as outlined by the Discussion Papers “all options on the table” approach) including stormwater harvesting, to diversify supply.

¹⁶ *Climate Change Science and Knowledge Plan for South Australia* (2020) page 8.

¹⁷ <https://www.parliament.sa.gov.au/en/Committees/Committees-Detail>

¹⁸ <https://www.lga.sa.gov.au/news-and-events/news/submissions>

¹⁹ *Fire and Emergency Services Act 2005* (SA) Part 4A.

DEW may wish to further consider and explore, along with other State Government agencies like Green Adelaide, the climate mitigation and adaptation benefits arising from sufficient investment in stormwater management.

Framework for improving stormwater management

The LGA notes the potential challenges associated with the improvement of stormwater management in South Australia and acknowledges that improving the current arrangements will require the agreement of stakeholders as well as a concerted, long-term effort.

There may not be one solution that addresses all of the challenges, therefore there needs to be agreement amongst stakeholders as to what success looks like. To support this process in relation to stormwater (and perhaps more broadly in relation to the Integrated Water Management Framework) a framework, like below, could be developed to provide guidance as to what good stormwater management from a legislative, policy and institutional perspective is.

The key principles in a framework could be:

1. **Leadership** – good leadership is required from state and local government, including having a shared vision and strategy, clarity on roles and responsibilities and coordination of activities.
2. **Integration** – stormwater should be considered as part of an integrated water cycle management framework, alongside water supply, sewerage and waterway health in order to maximise social, environmental and economic benefits.
3. **Understanding of the full costs and benefits** – investment and management decisions should be based on an informed understanding of the long term direct and indirect benefits and costs (impacts).
4. **Risk based decisions** – decisions should be prioritised based on risks to people, property and the environment.
5. **Agreed levels of service** – stormwater infrastructure and services should be developed and managed using agreed standards of service that reflect community's values and risk tolerance.
6. **Transparent and sustainable pricing** – stormwater services should have transparency pricing and sustainable funding sources which promote the long-term interests of community (users) and reflect community (user) values and understanding of risk.
7. **Place-based solutions** – stormwater management solutions should be developed in partnership with local government and tailored to local communities' values and priorities.



Figure 1: Framework for decision making - guiding principles for good stormwater management

Roles and responsibilities and funding arrangements for stormwater

It is acknowledged that to develop a strategic approach in relation to drainage and flood management it is necessary to address legacy issues associated with stormwater, including issues associated with ownership of infrastructure and assets and challenges with ongoing commensurate funding, the wide array of legislative responsibilities shared across organisations contributing to a lack of clear leadership, coordination and cohesive approach to stormwater management across South Australia.

It is also recognised that stormwater systems are key strategic infrastructure in urban environments that need to be adequately funded and managed.

Current funding available to local government is not adequate to meet the growing costs for stormwater services across South Australia.

Roles and responsibilities in stormwater management need to be identified and clarified to enable efficient review and risk assessment of existing assets before opportunities for integrated water management can be explored and realised. Until assets and their owners are identified, and the liability associated with strategic assets assessed, it is difficult to comment on what an effective management structure will look like.

Table 1 (below) provides a snapshot of some of the integrated roles and responsibilities different organisations have in relation to stormwater management in South Australia.

Acknowledging that stormwater management will always be a shared responsibility, there is a growing trend interstate and internationally, of centralised bodies (such as a water utility or independent regulator) having management and oversight of major stormwater infrastructure, supported by a regulated, economically efficient funding model.

Such models and key principles could be explored as part of the development of the Integrated Urban Water Management Framework.

Table 1: Summary of responsibilities

Organisation	Responsibilities	Key relevant legislation
Local government	<ul style="list-style-type: none"> Take measures (including building and maintenance of infrastructure) to protect their local government area from natural hazards, including flooding from stormwater runoff Have a role to “manage, develop, protect, restore, enhance and conserve the environment in an ecologically sustainable manner ...” which extends to how stormwater is managed, driving much of the activity in harvesting across the State over recent decades Play a critical role in the land use planning process through their development and administration of development plans, which determine where and what kind of development can occur, including in flood prone areas Have a role in maintaining some roads (and stormwater fixtures installed to protect roads) 	<p><i>Local Government Act 1999 (SA)</i></p> <p><i>Planning, Development and Infrastructure Act 2016 (SA)</i></p> <p><i>Metropolitan Drainage Act 1935 (SA)</i></p> <p><i>South-Western Suburbs Drainage Act 1959 (SA)</i></p>
SMA	<ul style="list-style-type: none"> Provide oversight and coordination of stormwater management, including prioritisation of infrastructure works Assist State and local government in preparing policies and best practice Facilitate and coordinate preparation of stormwater management plans (SMP) with local government Provide funding under the Stormwater Management Fund (SMF) to support local government in the delivery of SMPs 	<p>The Stormwater Management Agreement and Schedule 1A of the <i>Local Government Act 1999 (SA)</i></p>
DEW	<ul style="list-style-type: none"> Flood management hazard leader with specific duties in state-wide emergency flood management planning, including the development of a Hazard Plan Responsible for leading the development of state-wide strategy (such as the urban water strategy) and oversight of implementation of state-wide water policy, <i>Water for Good</i> Management of specific stormwater assets identified in the Stormwater Management Agreement (e.g. Patawalonga) 	<p>State emergency management plan under the <i>Emergency Management Act 2004 (SA)</i></p> <p>Stormwater Management Agreement</p>
Natural Resource Management Boards (NRM boards)	<ul style="list-style-type: none"> Have special powers to carry out works, including works undertaken for the purposes of stormwater management or flood mitigation 	<p><i>Section 31 Natural Resources Management Act 2004 (SA)</i></p>

EPA	<ul style="list-style-type: none"> Responsible for the protection of the environment, including from a water quality perspective Responsible for issuing and managing licenses as well as mitigation of non-point source pollutions 	<i>Environment Protection Act 1993 (SA) and Environment Protection (Water Quality Policy) 2015</i>
SA Department for Planning, Transport and Infrastructure (DPTI)	<ul style="list-style-type: none"> Responsible for overseeing the development and land use planning across the State Manages approximately 25 percent of SA's road network Develops stormwater design standards and guidelines 	<i>Planning, Development and Infrastructure Act 2016 (SA)</i>
SA Water	<ul style="list-style-type: none"> Responsible for the Sturt River Flood Control Dam, and the parts of Adelaide watercourses that it manages pursuant to the <i>Metropolitan Drainage Act 1935 (SA)</i> and the <i>South Western Suburbs Drainage Act 1959 (SA)</i> 	<i>South Western Suburbs Drainage Act 1959 (SA)</i> <i>Metropolitan Drainage Act 1935 (SA)</i> Schedule 1 of the Stormwater Management Agreement
SA State Emergency Services	<ul style="list-style-type: none"> Flood emergency control agency, responsible for coordinating emergency response following a flooding event 	State emergency management plan under the <i>Emergency Management Act 2004 (SA)</i>
SA Department for Health and Wellbeing	<ul style="list-style-type: none"> Responsible for developing policy and providing advice to other agencies and the public to prevent or minimise the adverse health effects of environmental hazards in the South Australian community, including providing advice to water providers, local councils, government agencies, and the public on the health implications of recycled water use (including stormwater reuse) 	South Australian Recycled Water Guidelines 2012
Private Landowners	<ul style="list-style-type: none"> Landowners, including owners of strata title property and other private landowners, have responsibilities for the condition of watercourses which pass through their land 	<i>Environment Protection Act 1993 (SA) and Water Quality Policy</i> <i>Natural Resources Management Act 2004 (SA)</i>

Flood mapping data

While the LGA does not have a formalised position on the risks associated with public access to flood mapping data, this matter could be explored further in consultation with the LGA's Local Government Mutual Liability Scheme. It is also noted that the role of local government is recognised here as representing communities which are the ultimate benefactors of a flood warning service, and that they are often the owners of dedicated flood warning infrastructure. These flood-related issues need to be integrated with other relevant State and Federal Government agencies.

Given that the Discussion Paper touches upon the emergency management implications of stormwater management and flood risk, input from and consultation with different emergency management authorities could be beneficial in developing the Integrated Urban Water Management Framework. This can support clarity of roles in an emergency and ensure that a truly integrated approach occurs.

3. Water for life – water to support healthy and enjoyable urban living

The Discussion Paper explores many of the ways in which availability of water contributes to a more pleasant, greener and cooler environment in which to live. There are great opportunities to explore, develop and communicate these opportunities with the community and government agencies. Reducing use of water may have been an approach during the 2013 drought, but there is growing recognition that a more effective approach is to not merely restrict use of water, but rather harvest and use it more strategically.

Accelerating urban greening is a key objective in South Australia's Climate Change Action Plan²⁰ and a key climate mitigation focus for local government, particularly metropolitan councils. It also contributes to a more pleasant urban environment and reduces urban heat island effect.

Two key barriers to urban greening are:

1. insufficient requirements for new developments to include appropriate vegetation, soil and water infrastructure; and
2. a knowledge gap of detailed spatial and temporal analysis of factors critical to greening, in particular, water availability.

Resources allocated to urban greening

Local Government Grants Commission Data in *Figure 1* (below) shows the significant annual investment local government makes in managing parks and gardens. With councils spending just under \$221million on parks and gardens in the 2019-20 financial year.

State government estimates that the cost for a council to plant and maintain a tree on public land is in the vicinity of \$1,600. Given that trees have been identified as central to state climate mitigation efforts and to achieving health and wellbeing outcomes alternative funding supports and incentives should be explored to promote urban greening to the community.

²⁰ [South Australian Government Climate Change Action Plan 2021-2025](#), Action 3.10 (page 36).

This could include promotion and incentives associated with WSUD and greening to landowners and developers or even rebates for homeowners who remove impervious surfaces and replace them with permeable pavement or re-vegetate them.

The LGA has expressed concerns with the Urban Tree Canopy Offset Scheme under the Planning Code²¹ and is supportive of the State Government’s commitment to an ongoing review of the Scheme’s contribution rates.

Socioeconomic inequalities associated with green space quality are well established, where lower socio-economic areas of the community often experience lower provision of green space. The increased understanding of future potential climate and disaster risks for South Australia²² exposes communities with lower provision of green space to be less resilient to future climatic events.

The National Water Reform Report notes that where basic water needs payment represents an unacceptable cost burden, *“These circumstances can warrant a State or Territory government operational subsidy to reduce prices and prevent onerous cost imposts on customers.”*²³

As discussed above, expanding what constitutes a “basic level of service” in relation to water may provide an opportunity close the socioeconomic “green divide” between South Australian communities.

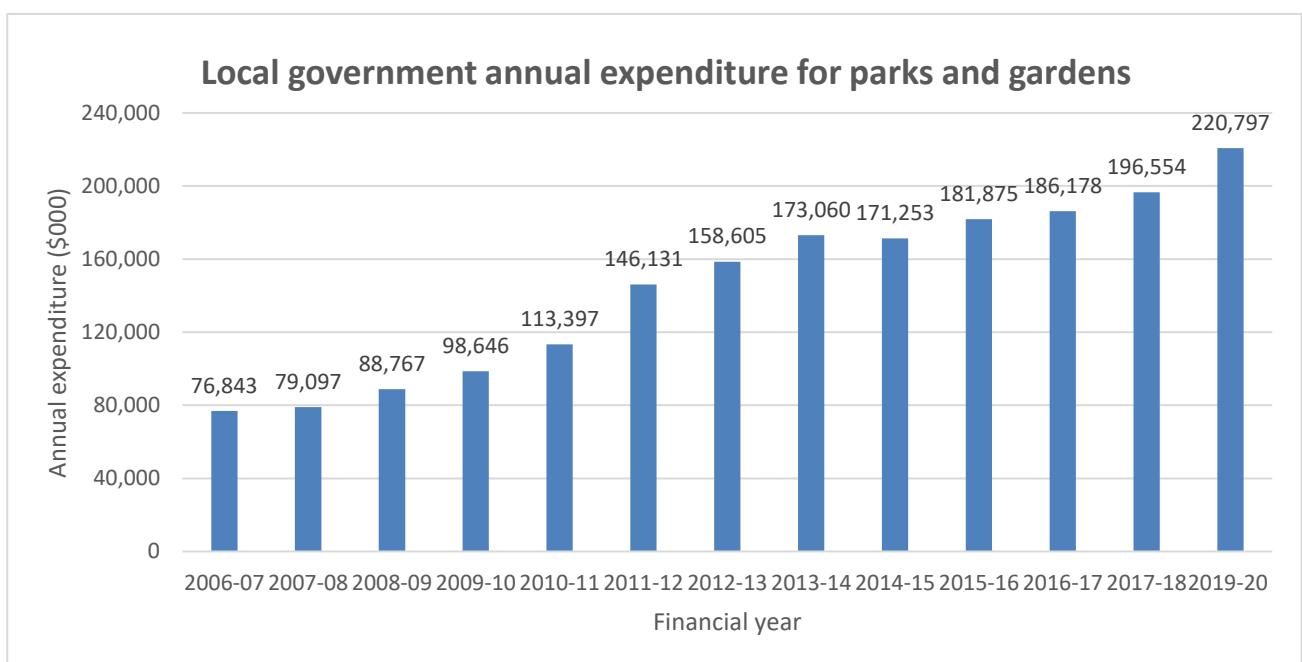


Figure 2: Local government annual expenditure for parks and gardens - Local Government Grants Commission Data

²¹ GAROC Committee Meeting Report (15 March 2021), at Report 5.6 - Planning and Design Code Implementation Update page 99 <<https://www.lga.sa.gov.au/about-lga/lga-meetings/garoc>>.

²² South Australian Government Climate Change Action Plan 2021-2025.

²³ Australian Government Productivity Commission, *National Water Reform: Productivity Commission Inquiry Report* (No. 96, 28 May 2021), page 173.

Traditional Owners Interest in Water Management

The LGA encourages DEW to reflect cultural considerations in the Integrated Urban Water Management Framework.

Australia's First Nations peoples have a primary, unique and inherent obligation to exercise the ownership, protection and management of the Australian environment, DEW acknowledges that "freshwater systems are fundamental to Aboriginal cultures and identities and First Nations have profound perspectives and understanding of water across the South Australian landscape."²⁴

The National Water Reform Report found that "much more needs to be done to include Aboriginal and Torres Strait Islander people's interests in water in jurisdictional planning and the management of water."²⁵

To achieve DEW's aim, "...to build meaningful, enduring change and equity for First Peoples and Nations in Caring for their Country"²⁶ and to achieve cultural objectives through water planning and management, the development of, and any actions arising out of any integrated water management framework should ensure Traditional Owners' interests in water are elevated to reflect evolved water aspirations.²⁷

Conclusion

The LGA welcomes the development of an Integrated Urban Water Management Framework and is pleased to continue working as partners in government to inform this process and help develop a sustainable framework for the benefit of the South Australian community.

Contact

Please direct any queries about this submission to Brianna McGee, Senior Policy Officer at Brianna.mcgee@lga.sa.gov.au

²⁴ <https://www.environment.sa.gov.au/about-us/first-nations-partnerships/water-resource-planning>

²⁵ *National Water Reform: Productivity Commission Inquiry Report*, page 125.

²⁶ <https://www.environment.sa.gov.au/about-us/first-nations-partnerships/water-resource-planning>

²⁷ *Ibid*, page 124.



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