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Government of South Australia

Adelaide and Mount Lofty Ranges
Natural Resources Management Board

Our Ref: 18_114

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Dear Planning Reform Team

Re: Comments on the Productive Economy Policy Discussion Paper

Thank you for providing the Adelaide and Mount Lofty Ranges Natural Resources Management Board (the Board) the opportunity to comment on the Productive Economy Policy Discussion Paper.

The Planning, Development and Infrastructure Act 2016 (PDI Act) allows for the establishment of a single planning rulebook, the Planning and Design Code (the Code), to guide the assessment of all development applications across the state. Under the *Natural Resources Management Act 2004* (NRM Act) the Board is responsible for ensuring that policies developed under the PDI Act are consistent with the NRM Act and the regions' NRM Plan.

The Board welcomes the focus that this discussion paper brings to the protection and enhancement of our State's environment while boosting the state's economic competitiveness.

The Board notes that the discussion paper is silent on the integration of coast and marine elements of land-use planning and policy frameworks. A number of the elements outlined in the Discussion Paper such as; improved controls to manage external impacts; zoning models that support mixed use and diversification of business and industry; planning controls that support emerging business practices and technology; are also relevant to coast and marine planning.

Importantly, planning policies should aim to mitigate land-based impacts to marine environments. Impacts such as sedimentation, water quality and pollution have the potential to adversely impact marine and coastal economic development including fisheries, aquaculture, coast and marine tourism, as well as have an impact on marine and coastal wildlife. Progressing a marine planning system is key to the sustainable economic use of marine and coastal resources and managing increasing competition with other users of marine environments.

While this discussion paper does not seek comments on spatial data, the Board would take this opportunity to highlight some matters regarding the use of environmental spatial data in the new planning system.

The Region and the Department of Environment and Water maintain a number of spatial environmental data sets, which are currently being considered by DPTI for use as overlays

in the on-line planning system. The Board feels it is important to highlight that in some cases, these data sets may not have the appropriate level of coverage or accuracy needed to guide whether or not a development should be permitted.

It is recommended that further work is done to test the suitability of these data sets for use in overlays and identify any critical data gaps and limitations. Where gaps or limitations are identified the Board recommends that either investment is made to address these issues or the current system of referral for expert advice is maintained to avoid perverse outcomes.

A further matter that the Board would like to bring to your attention that does not relate to the discussion paper but rather the reforms more broadly is the opportunity to streamline approvals processes. This could occur through a clearer connection between the land use planning and natural resource management systems. We also intend to raise this matter with the Minister for Environment and Water as part of the Landscapes South Australia legislative reform.

Comments on specific elements of the Discussion Paper are provided in the attached table. Should you require further information on any aspects of the submission please contact Ms Solange Cricelli, Senior Policy Officer on [REDACTED].

Yours sincerely



Brenton Grear
Regional Director

ATTACHMENT 1

Adelaide and Mount Lofty Ranges Natural Resources Management Board comments on the Productive Economy Paper

Section	AMLR comment
<p>Introductory content and preamble</p>	<p>P8- <i>We intend to protect our food bowl, our natural assets and our picturesque landscapes to ensure we are able to enjoy them long into the future-</i> The Board supports this statement. Planning and decision making frameworks need to plan and provide investment for maintaining key natural assets, not just built infrastructure. The growth potential of the nature-based tourism sector is dependent on the maintenance of natural landscapes and biodiversity. This includes investments in green infrastructure and key environmental assets such as National Parks, Marine Parks, natural coastal features and wildlife.</p> <p>P10 – <i>Environmental impacts</i> - The Board appreciates reference to the impacts of climate change and the need to adapt. It is also important to recognise the potential economic and sustainability benefits that can be realised from investment in climate adaptation.</p> <p>The conservation of coastal dunes, mangroves and samphire, is beneficial to coastal protection due to the physical influence these habitats provide with regards to mitigating storm and sea level rise impacts. Additionally these environments play an important role in adapting to climate change and sea-level rise.</p> <p>P15 – <i>The low-carbon and circular economy</i> – The Board appreciates the identification of the resource recovery and waste sector as a potential growth industry for SA. The board recommends that further work is done to identify what will be needed to grow this particular part of our economy - it is understood that legislative reform may be needed to turn waste into resources.</p> <p>P27 - <i>Where can the Code help?</i> - Key to use of land-use planning mechanisms and frameworks in coast and marine environments are:</p> <ul style="list-style-type: none"> • a precautionary approach to the development of infrastructure to minimise impacts to coastal environments and visual amenities; • integrated coastal and catchment policies to reduce land-based impacts to marine environments; • minimising the discharge of pollutants harmful to human health or the natural environments within industry (and tourism) operations; • development and integration of codes of practice with relation to marine and coastal environments; and • adequate resources for effective training, capacity building and implementation.
<p>Theme 1: Supporting and growing key industries</p>	<p>P27 – the statement <i>“The Code needs to continue to protect South Australia’s viticultural and horticultural lands from urban encroachment and development that detracts from iconic landscapes”</i> is supported by the Board. The introduction of the Environment and Food Protection Areas (EFPA) is a positive step in the right direction in addressing this issue.</p> <p>P27 - The paper notes <i>“Policies in the Code must consider interactions with other regulatory levers, such as environmental impact statements”</i>. There is also arguably a need to consider how codes and policy change can improve</p>

	<p>processes for rehabilitation of mine areas, particularly older established mineral sites such as salt fields. Potential conflicts with fisheries, aquaculture, tourism and conservation can arise from offshore mineral and petroleum development and need to be better addressed by future codes and policy. The Board recommends the development of a more integrated marine planning system and policy to address this.</p> <p>P27 – <i>Tourism</i> - The discussion paper seems to focus on tourism accommodation growth, however, the Tourism Research Australia report referred to in the discussion paper, also found that state domestic tourism markets caravan and camping tourism accounted for 15% of all accommodation nights, in SA, up 9% to \$54.8 million. Whilst this outlines a need to maintain strategic investment and policy considerations in camping facilities within and adjacent to parks, it also highlights the importance of investing in parks, recreation and wildlife experiences for attractive visitor experiences.</p> <p>P28 – <i>Policy Conservation Area – Metropolitan Growth Management</i> –It has been identified that infill land has been used at a faster rate than predicted (as part of the 30 Year Plan review). If there is anticipated to be future demand for housing, potential sites should be identified as early as possible.</p> <p>P53 - <i>Subtheme 1H</i> - Maintaining the ecological integrity and amenity of marine and coastal environments and catchments are key concerns in relation to aquaculture development. When large areas close to the coast are used for aquaculture community concerns are often raised in relation to water quality impacts and loss of public amenity.</p>
<p>Q1.1 Should the Code include a 40 metre interface buffer between rural and residential, but allow a smaller buffer distance if it can be justified?</p>	<p>The Board recommends the use of a minimum interface buffer rather than a set buffer to ensure minimum disturbance to both the residence and primary production/rural activities.</p>
<p>Q1.2 Does policy regarding subdivision and minimum allotment sizes need to be reviewed and strengthened?</p>	<p>Policy needs to continue to protect our food bowl, our natural assets and our picturesque landscapes while allowing for growth in our state.</p>
<p>Theme 2: Linking people to jobs, goods and services</p>	<p>P31 - The Board welcomes the recognition that <i>‘unstructured urban sprawl...erodes productivity’</i> and conversely, its management should offer better environmental outcomes.</p> <p>P32- <i>Point 2. Expansion</i> – If expansion or intensification at the edge of centres is needed, it should incorporate elements of green infrastructure and water sensitive urban design to reduce urban heat impacts from expanding or intensifying urban areas.</p> <p>P37 – <i>“How do we harmonise planning objectives for an efficient pattern of settlement at the metropolitan level with the need to encourage investment</i></p>

	<p><i>in new retail facilities?”</i> Regional planning could set targets for green infrastructure and liveability which would facilitate growth in defined areas while encouraging sustainable development which is not detrimental to the users or surrounding residents.</p>
<p>Theme 3: Providing infrastructure to enhance our liveability</p>	<p>P42 – <i>Basic schemes</i> - the Board suggests that basic schemes should also ensure delivery of green infrastructure, water sensitive urban design and climate ready design as a standard element. These requirements have the potential to improve liveability and if not embedded in the planning scheme, the benefits could be missed.</p> <p>P43 – <i>Key issues</i> - many of these issues are similar to the key priorities in the Regional Natural Resources Management Plan for the Adelaide and Mount Lofty Ranges:</p> <ul style="list-style-type: none"> • Target 5 - Maintain or increase the productive capacity of agriculture • Strategic Direction L-A Identify and resolve land use planning conflicts to minimise impacts on natural resources • Strategic Direction (Land management and change) L-E Maintain high value primary production areas for primary production • Strategic Direction (Economic) E-A Support and encourage sustainable primary production • Strategic Direction (Economic) E-C Support and encourage sustainability in other industries reliant on natural resources • Strategic Direction (Economic) E-E Recognise the intrinsic economic value of biodiversity <p>Detailed policy development is likely to be required, as was considered for the Mount Lofty Ranges Watershed overlay policy and non-compliance list, which clearly mandates which developments are considered appropriate in sensitive areas, interface issues and opportunities for value adding.</p>
<p>Q3.1 How should planning policy respond to growth in renewable energy – what issues should be addressed?</p>	<p>P39 – The growth of the energy sector has presented challenges in some locations as well impacts associated with some developments. Strategic planning should seek to avoid unplanned growth through improved guidance or codes of practice to facilitate expansion while mitigating impacts on the environment and users. This includes addressing the impacts of temporary structures or infrastructure, even if in place for emergency purposes.</p> <p>The Board agrees that there is a need for updated policy on renewable energy generation and its integration with primary production activities. There is also a need to consider the scale of impacts on environmental interests and the cumulative impacts of these developments, to determine if improvements to the assessment and approval process can be made.</p>
<p>Q3.2 Should existing unused farm houses be able to be separately titled to allow their adaptive reuse and to facilitate economic activity?</p>	<p>The Board would like to highlight that this could be problematic in sensitive areas. The scope of any change of use needs to be clear.</p>