

**From:** Swain, Nick <[REDACTED]>  
**Sent:** Friday, 30 November 2018 11:45 AM  
**To:** DPTI:Planning Engagement  
**Cc:** Day, Peter; Crocker, James; Hoefel, Daniel; Cawley, Richard  
**Subject:** Submission In Response To Natural Resources and Environment Policy Background Paper

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you for the opportunity to respond to the issues raised in your Natural Resources and Environment Policy Discussion Paper August 2018. The objective of the Planning and Design Code providing a single 'rulebook' for assessing all development applications in South Australia will be a major and highly desired achievement. It is pleasing to see natural resources and environment is a fundamental theme in the Code. Some specific comments are provided below:

### **Mount Lofty Ranges Watershed Protection and other Watershed Areas**

The Discussion Paper proposes the Code will enable consistency in application of policy in Watershed areas via the use of Overlays. This is supported as a valuable tool for all concerned. As the watershed is a crucial element of water supplies for the greater metropolitan Adelaide area and SA Water is responsible for managing a major proportion of drinking water sourced from this area, we look forward to being consulted on the development and finalisation of the Overlay.

### **River Murray**

The Discussion Paper suggests the opportunity exists for taking a 'regional approach to deal with policy inconsistencies between different council areas'. Again, this is supported as a positive suggestion although it is noted that the Overlay solution is only proposed for this catchment 'where required'. It is suggested that as a default this catchment be the subject of an Overlay unless it can be shown that this is unnecessary in a particular area.

SA Water notes that whilst development in the South Australian catchment can indeed adversely impact on the quality of River Murray water, there are also other important factors that include blackwater events, saline water intrusion, algal blooms, upstream climatic conditions and manipulation of the weir pool

The following paragraph in the River Murray section on page 21 is applicable to all watersheds in the state:

"Policy for land-use activities and intensity clearly has an impact on water resources, their ongoing availability and quality. In SA's regional towns and communities, the combined supply of wastewater from SA Water Wastewater Treatment Plants and Local Government Community Wastewater Management Schemes, together with stormwater capture and reuse, are all becoming increasingly important to meet water demand and reduce environmental impact."

### **General comment**

The Discussion Paper makes various suggestions for improvements in the overall planning system. It would be helpful if a discussion was included in the Paper and in subsequent documents, about how these proposals will specifically address current weaknesses in the system.

In a similar vein there is a strong emphasis on the beneficial effects of Green Infrastructure and Water Sensitive Urban Design in the Discussion Paper. These, as with the benefits of all proposals,

need to be weighed against the tangible and intangible utility costs of introduction and ongoing maintenance. For SA Water, all regulatory costs, including those foreshadowed in the proposed Planning and Design Code, need to be funded from income generated from customers. Any additional regulatory costs will therefore correspond to pressure to increase water prices.

Please contact Nick Swain, Manager, Environment, Land & Heritage Expertise, telephone [REDACTED], [REDACTED], for clarification of any of these comments.

**Nick Swain**

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SA Water respects and acknowledges the deep spiritual connection, knowledge and relationship Aboriginal and Torres Strait Islander people have to land and water.

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