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Dear Planning Reform Team

**Re: Feedback on the Productive Economy Discussion Paper**

Thank you for the opportunity for the South Australia Murray Darling Basin Natural Resource Management Board (the Board) to comment on the Productive Economy Discussion Paper.

The primary object of the *Planning, Development and Infrastructure Act 2016* (PDI Act) is "to support and enhance the State's liveability and prosperity in ways that are ecologically sustainable". Under the *Natural Resources Management Act 2004* (NRM Act), the Board is responsible for taking an active role in ensuring that policies developed under PDI Act also promote the objects of the NRM Act and complement the regions current NRM Plan. The Board therefore has a strong interest in the creation of the Planning and Design Code for South Australia. Engagement on the Productive Economy Discussion Paper is another important step towards developing the Code.

The Board welcomes the themes that have been identified in the Discussion Paper, and supports the further development of progressive Code policies to promote and embed improved natural resources and sustainability outcomes within the planning system.

For the Discussion Paper to translate into effective policy design, it is essential that the new Code considers how to recognise, value and protect environmental assets. This includes assets that are located outside of areas of environmental significance such as roadside vegetation, remnant native vegetation and habitat, urban habitat in trees and gardens.

The Board would like to highlight the importance of our primary industries in our region, underpinned by water and biodiversity ecosystem services.

The Board welcomes the focus that this discussion paper brings to the sustainability and growth of our State's productive economy and looks forward to continuing to work with DPTI on the Planning and Design Code development in the near future.

Further 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 Eilidh Wilson, Senior NRM Policy Officer on 8391 7506.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sharon Starick', written over a light blue horizontal line.

Sharon Starick

**Presiding Member**

**South Australian Murray-Darling Basin Natural Resources Management Board**

**Attachment 1**

**Murray Darling Basin NRM region comments on the Productive Economy Discussion Paper**

Section	Comment
Background Paper	<p>P4 – Strategic Directions and State Planning Policies – It is suggested that the SPP for Climate Change should also be included here. Climate change is highly relevant to the state’s economy – for primary industries, fishing and forestry; and also for tourism potential now and into the future. The background paper recognises that there is a need for flexible policy moving into a future where diversification and farm based businesses are likely to increase. One of the main drivers for this may be climate change, where existing land use becomes untenable in increased periods of drought, extreme weather or changes in growing seasons.</p> <p>P15 – The low-carbon and circular economy – The region appreciates the paper identifying this as a potential growth industry for SA, however the themes do not really tease out how the planning system can respond to grow this particular part of our economy. It’s possible that expansion of Theme 4 could consider this – in asking the question ‘What are the current barriers preventing growth of this industry?’ It is known that legislative reform may be needed to turn waste into resources and the paper could identify this. Of all the potential emerging industries, this is perhaps one that SA can take the lead on and act on to drive, much in the same way the energy policy has driven the alternative energy production market.</p>
Theme 1: Supporting and growing key industries	<p>P27 – the statement “The Code needs to continue to protect South Australia’s viticultural and horticultural lands from urban encroachment and development that detracts from iconic landscapes” is supported by the region. However, there is little protection in the current system outwith the EFPA, where it is up to the remit of individual councils to determine land use changes in zones. The Background Paper highlights this as an issue warranting further consideration – to allow increased flexibility for land use changes within the primary production zoning. This is an area the board have concerns around – it is often changes in land use or management practices which can exacerbate or generate natural resource management issues. The board would therefore welcome the opportunity for engagement in future policy discussions.</p> <p>Horticultural and agricultural production areas with higher production capacity should be better protected from urban encroachment by planning policy. Adequate and functional buffer zones need to be established between primary production and urban areas to minimise conflicts which can arise between these land uses. Additional protections should be considered for key crop and livestock production areas to ensure that productive capacity is maintained in these areas and as a guide to agricultural infrastructure investment and development (synonymous with the Northern Adelaide Plains irrigated food production and agribusiness area).</p> <p>There is a need to clarify the requirement for buffer zones in many developments, not just those adjacent to crops under chemical management. Buffer zones can provide multiple benefits to landholders and surrounding ecosystems, increasing the resilience of ecosystems and providing pollination services while also acting as a recreational zone. Policies which affect or enable economic growth must do so sustainably, with reasonable consideration for the environment locally and cumulatively. Without this consideration, there is a risk that key industries will suffer as biodiversity is ignored.</p> <p>P28 – Policy Conversation Area – Metropolitan Growth Management – It appears to be contradictory that the growth statistics for the state indicate falling populations and land consumption/house construction, yet the paper indicates there is likely to be a “renewed focus on the identification of lands catering to future housing growth...” It has been identified that infill land has been used at a faster rate than predicted (as part of the 30 Year Plan review), but if there is anticipated to be future demand for housing, potential sites should be identified as</p>

Section	Comment
	<p>early as possible. The board supports the statements on urban consolidation (page 36) regarding restricting urban growth into urban fringe areas where good agricultural land and access to market exists. Protection of these lands for food and fibre production will be important for economic development in agricultural industries and tourism opportunities with a range of jobs that can flow from this.</p> <p>Sub-theme 1E – The Board recognises the need for a review of some of the land use definitions relating to farming, and would welcome an opportunity for input to this discussion.</p> <p>Sub-theme 1G – Planning policies may need to consider the increasing likelihood of drought/Climate Change/severe weather impacts. The restriction of urban growth into urban fringe areas where good agricultural land and access to market exists (p36) will in itself be an effective strategy against climate change. The productive capacity of these lands is higher, rainfall is more reliable, and access to alternate sources of water for irrigated crop production is more widespread. Areas where water resources with allocations to irrigated agriculture should also be protected as a priority, as should the water resources themselves.</p> <p>Sub-theme 1H - Aquaculture development will be increasingly important with ongoing depletion of fish stocks from the world’s seas and oceans. Aquaculture development needs to be undertaken in a sensitive manner so as not to negatively impact on water resources and aquatic ecosystems. Opportunities exist for integration with other industries to reduce the volume of waste products and these should be explored. Similarly there are a range of opportunities for agricultural waste products from intensive industries and urban waste recycling which could be used to improve land and productive capacity in less intensive agricultural industries i.e. manures from feed lots or mulches from garden waste can be spread on cropping areas with sandy soils to improve soil structure and nutrient and water holding capacity. This would also increase resilience against climate change.</p> <p>Sub-theme 1I – The Natural Resources South Australia Murray Darling Basin’s Sustainable Agriculture Program provides financial support to research into innovative soil and agronomic management practices that improve soil physical, chemical and biological parameters whilst increasing agricultural production and farm profitability. The purpose is for the management of soil degradation issues including wind erosion, soil acidity, water erosion, water repellent soils, dryland salinity and seeps, and depletion of soil carbon. Current projects include:</p> <ul style="list-style-type: none"> <li>• Measurement of soil parameters under regenerative grazing practices to quantify change and rate of change to soil physical, chemical and biological parameters</li> <li>• Surface and sub-soil application of organic amendments to soil in viticultural land use to increase soil carbon and in turn, improve soil moisture and nutrient holding capacity.</li> <li>• Trial crop legume management options that encourage longer persistence of legume stubbles on sandy soils and reduce soil erosion risk window</li> <li>• Supporting investigations / trials into the management and remediation of Mallee Dune Seep areas.</li> <li>• Supporting investigations / trials into the management and remediation of dryland salinity in the upper South East</li> <li>• Demonstration and awareness raising on the management of soil acidity, in particular in areas where soil acidity is an emerging issue.</li> </ul> <p>A range of reports and info sheets are available on past projects on our website at - <b><i>Natural Resources South Australia Murray Darling Basin.</i></b></p>

Section	Comment
Sub-theme 1.2 - Tourism	<p>Tourism generates approximately \$5.3 billion per annum for the South Australian Economy (International Visitors Survey and National Visitors Survey, June 2015), with a large portion of this attributable to the world class networks of national parks, marine parks and engaging habitats and species. The SA government policy <i>Nature Based Tourism</i> seeks to inject \$350 million into the state economy each year by 2020, through activating opportunities for industry growth. Visits to the State which involved nature based tourism currently generate around \$1.1 billion in expenditure each year for the state (Griffith Institute for Tourism and Tourism research Australia (2014) <i>Nature-based Tourism in Australia</i>). The policy discussion paper does reference 'natural areas', but could also include the importance of biodiversity and natural character as the key aspects which underpin tourism and economy. Without adequate policy linkages to the climate change SPP and biodiversity SPP, tourism development could compromise biodiversity and natural character. The Board suggest that policy development is needed for 'eco-tourism' to set some standards against which developments can be assessed. As with all developments which could impact on biodiversity or natural character, an understanding of cumulative impacts will support assessment processes.</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>The Board recommends that the Commission consider the recommendations of the 2017 document: <i>Report of the PIRSA buffers working group, 2015-16</i> which thoroughly evaluated buffer distances and spray drift management. The primary recommendation was for "new planning procedural arrangements for involving appropriately qualified and experienced farm sector consultants in the assessment of proposals for chemical-sensitive land use change." The Code development would appear to be an opportunity to explore this recommendation further.</p> <p>In general, buffer width should be determined by the industry type and potential for conflict. For less intensive industries the potential for conflict is less and buffers such as tree lines may restrict a desired visual amenity. For more intensive agricultural industries with increasing degree of operations, buffers are recommended to screen noise, lighting from night operations, odours and chemical drift from agricultural industries to residential areas.</p> <p>Buffer distances should also be considered for application between intensive agricultural industries and environmental assets such as waterways and remnant native vegetation.</p>
Q1.2 Does policy regarding subdivision and minimum allotment sizes need to be reviewed and strengthened?	<p>Policy needs to consider and manage the outcomes of smaller lot size and subdivision, with increased roof and hard surface areas increasing stormwater runoff and water volume in creeks.</p>
Q1.3 Do we need to review our signage policies? In particular, do we need facilities for third party advertising and tourism advertising? For example, should there be more scope for tourism signs on arterial roads and outside of townships?	<p>This may be of benefit to regional economies to inform travellers about the visitor opportunities that exist in a town. Many towns currently have a public amenities board at the town entrance which lists museums and historic places and this could be expanded. It would need to be managed with care and sensitivity to ensure it remained visually appealing, did not pose a road safety hazard for road users and promoted the virtues of the area rather than single entities. In summary, a consistent approach to style, content and branding could benefit many rural town approaches.</p>
Q1.4 Should undeveloped strategic mineral resources be identified and protected from urban encroachment and other incompatible development?	<p>The Mining Act (1971) makes provision for addressing land-use conflicts at the time of seeking a mining tenement. This is an appropriate point in time when a decision can be made about land-use priority (whole of government perspective) and for that to be reflected in Development Plan policy.</p>
Theme 2: Linking people to jobs, goods and services	<p>P31 - The region welcomes the recognition that 'unstructured urban sprawl...erodes productivity' and conversely, its management should offer better environmental outcomes.</p> <p>P32- Point 2. Expansion – If expansion or intensification at the edge of centres is needed, it will need to continue to meet design requirements which include elements of Green Infrastructure.</p>

Section	Comment
	<p>This combines the benefits of stormwater management with urban cooling, planting etc to reduce urban heat impacts from expanding or intensifying urban areas for users and surrounding residents.</p> <p>P37 – “How do we harmonise planning objectives for an efficient pattern of settlement at the metropolitan level with the need to encourage investment in new retail facilities?” 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>P39 – The growth of the energy sector has presented issues with locations and impacts of some of these developments. Strategic planning should seek to avoid unplanned growth through improved guidance or codes of practice which can still facilitate expansion while mitigating impacts on the environment and users. This should include the impacts of temporary structures or infrastructure, even for emergency purposes.</p> <p>The region 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 could be made. Recent research into solar farms has suggested that these developments can become heat sinks themselves, impacting the surrounding environment (<b>Barron-Gafford, G. A. et al. The Photovoltaic Heat Island Effect: Larger solar power</b>).</p> <p>P42 – Basic schemes should also ensure delivery of green infrastructure and climate ready design as a standard element. Similarly for general schemes, there is potential for green infrastructure and good design to include elements which improve liveability. If the requirement is not embedded in the planning scheme, these benefits could be missed.</p> <p>P43 – many of these issues are similar to the Strategic directions in the Board Business and Operational Plan 2019-22 for South Australia Murray Darling Basin:</p> <p>Manage our biodiversity assets to improve resilience of ecosystems into the future for all, while achieving landscape scale ecological change</p> <p>Manage water resources for the benefit of multiple users including the environment in a changing climate</p> <p>Working with landholders towards sustainable production systems</p> <p>Building increased understanding of the adaptive capacity of the region and all focus areas therein.</p> <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>It would be helpful to have state planning policy which addresses the growth in energy generation developments, and seeks to provide rationale for early engagement and site selection. Many of the sites proposed for these types of development contain important species and communities, for which offsets do not replace their loss. It would be easier to identify a potential shortlist of sites early on in the planning process so that environmental and community impacts are managed appropriately and given due regard. Ideally, energy generation should be sited on lands which have little to no agricultural value and will not disturb or impact negatively upon key environmental assets such as large areas of remnant vegetation or threatened / endangered species.</p>

Section	Comment
Q3.2 Should existing unused farm houses be able to be separately titled to allow their adaptive reuse and to facilitate economic activity?	This could generate economic activity depending upon the location. If permissions were given for separate titles these should be small enough to not impede farming operations and include appropriate zoning to allow for retail enterprises. This does present a risk in areas close to urban centres, where lifestyle residents could move in and prevent or disrupt an ongoing stimulation of economic activity beyond the sale of the house. If development of retail or service industry use could be guaranteed then this may be beneficial, however it is a complex issue which planning policy may not be able to manage.
Theme 4: Facilitating innovation and enabling investment	
Q4.1 Do we have adequate planning policies in place to encourage/support the aims of innovation districts?	It is not just the development of innovation precincts but the delivery of that innovation to end users that will be important. Whilst that may not be the responsibility of the Planning Commission, it is something that the state government should consider to ensure innovation and technologies are being showcased, employed and adopted in key South Australian industries including agriculture.
Q4.3 Does planning policy need to respond better to new ways of doing business such as the emergence of the sharing economy – which may require the introduction of controls to mitigate previously unanticipated effects (for example, the conversion of long term rentals into short stay holiday accommodation via online platforms)?	It is important for farming communities and regional areas to have a range of stay and accommodation options for seasonal workers, professionals conducting business, travellers and tourists. Online platforms have become increasingly popular and important in the mix of accommodation options. It is unclear as to whether this is something that planning policy could manage, although an attempt was made to address this in the development of the Mount Lofty Ranges Watershed Overlay and supporting policy.
Q4.4 What will be the emerging industry impact of e-Commerce and how should these be managed by the Code?	It may be prudent for markets to develop and adapt in line with industry requirements as part of the evolution of this emerging industry. This may be the best way to allow e-commerce to fully develop. Key barriers or market failures can be regulated if they emerge and cannot be resolved by industry.