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DPTI

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The Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Per e-mail: DPTI.PlanningEngagement@sa.gov.au

Dear Mr Lennon,

Productive Economy Policy Discussion Paper – Submission

Thank you for the opportunity to provide feedback with respect to the abovementioned Policy Discussion Paper.

General Comments:

The following general observations and comments are provided for the consideration of the Commission:

- Emerging Trends – it is pleasing to note that the draft document recognises local and global emerging trends affecting the State's economic base and highlights the role that land use planning can have in supporting the growth of new industry by providing a facilitative policy environment. It is however important for new policy to recognise 'non-negotiables'. That is, it is important to ensure that the pursuit of new industry is not at the expense of established 'traditional' industry and planning policy adequately addresses elements such as interface management.
- Supporting Economic Growth – Council supports a planning system which fosters, facilitates and enables economic growth opportunities (pg 21). It is considered relevant to highlight the work being led by Department of Primary Industries and Regions, South Australia (PIRSA) in support of the Northern Adelaide Irrigation Scheme (NAIS) installation in the form of the Northern Adelaide Plains Agribusiness Initiative (NAPAI). This initiative takes a 'whole of system' view to foster projects and initiatives designed to accelerate long-term agribusiness growth. A sub-group of regional planners has met to discuss how the new planning system may foster and support development within the wider region from the coast to the Barossa and provide 'policy certainty'. The new planning system, supported by this facilitative policy has the potential to transform the landscape and take advantage of opportunities presented.

In addition to the above the document recognises the relationship of planning to 'other levers' and provides examples of such (pg 22). It is noted that there is also potential at a State and National level to advocate for amendments/improvements to the Building Codes and Standards to recognise emerging trends and streamline processing.

- Managing Potential Conflict (pg 24) – The Policy Discussion Paper correctly identifies potential conflict between primary industries and urban development, however it is unclear how conflict between competing primary industries may be better managed under the new regime. The matter of interface management and buffers has, and continues to be of concern to primary producers in areas with a high level of primary industry diversity. It is disappointing that this has not been identified given the work completed by a PIRSA led working group looking into the issue and strong advocate activities from local primary producers. Whilst it is not the role of planning to pick

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'winners and losers' when considering new development it is important to highlight that the resolution of possible interface issues early would assist in minimising potential for conflict between land uses. It is noted that the Policy Discussion Paper is largely silent on this point.

It is further noted that the nominated timeframe for consideration of interface, namely forming consideration in Generation 2 of the P&D Code (pg 53) is again disappointing given the work completed to date in this space.

Conversation Areas

- Metropolitan Growth Management (pg 28) – There continues to be a need to strike a balance between infill and outer metropolitan growth which in turn provides housing variety and choice to the South Australian community. There is also a need to consider in more detail the role townships can play in supporting metropolitan growth and turn attention to supporting sustainable growth in those township within the greater Adelaide region.
- Centres Policy and Retail Investment (pg 31- 39) – Council supports and is actively working to ensure the existing and new activity centre at Roseworthy meet the needs of our community. It is Council's view that there remains relevance in maintaining a hierarchy of centre policy which in turn can contribute to the clustering and 'agglomeration' of knowledge and complementary enterprises in locations supported by a facilitative policy environment.

It is noted that the Roseworthy Township Expansion project has reached project delivery stage with the first land divisions lodged. This area can indeed be recognised as providing secondary employment and activity with allied employment land development, regional industrial activities and a wider range of local employment opportunities within close proximity.

It is noted that there appears to be mapping anomalies on page 38 "Map 3: Activity Centres and Mass Transit Routes". Whilst highlighting the Roseworthy Township Expansion area the map omits the inclusion of the dormant railway corridor between Gawler and Roseworthy as a 'Potential' fixed line mass transit route and does not identify the new activity centre at Roseworthy as a District Centre.

- Infrastructure to Enhance our Liveability (pg 39) – Council recognises and the Discussion Paper correctly identifies that the provision of infrastructure which is fit for purpose and timely plays a key role in supporting liveability. However, it is noted that the Discussion Paper is silent on the role of emerging technologies, such as smart city infrastructure, plays/will play in shaping our city and townships. The planning policy environment needs to recognise and support the implementation of this form of infrastructure in the same manner as it does 'traditional' infrastructure.
- Economic and Industrial Land Utilisation/emerging Industries (pg 43) – It is pleasing that the Discussion Paper recognises the opportunities for value-adding in rural areas and this complements work previously undertaken by Council.

It is further noted that Council supports the actions to protect agricultural land and managed interface with urban areas. It is however noted that the Discussion Paper continues to neglect the potential for interface conflict between competing primary industries. It has been Councils experience that conflict often arises when a proponent proposes to introduce a 'sensitive' type primary industry adjacent an alternative type primary industry (e.g. the planting of a vineyard adjacent a broadacre cropping paddock), however is as relevant when considering the impact of farming practices on the boundary between an organic and non-organic or the potential in the future for conflict between genetically modified and non-genetically modified crops.

In the discussion question posed on page 53 the Commission is seeking feedback on the suitable separation distance between rural and residential activities. Council questions whether consideration has been given to policy to support interface management between primary industries or whether the Commission has been working with other agencies and levels of government to establish a framework for these considerations which sit outside of planning?

Discussion Questions

- Sub-theme 1.1 Primary Industries (pg 53) – This discussion question seeks feedback on whether there needs to be a review and strengthening of subdivision and minimum allotment sizes considerations in primary production areas. It is Councils view that the time is right to

comprehensively review minimum allotment sizes within primary production areas as there continues to be significant variations in minimum sizes across the State.

The basis for this review needs to be wide reaching, robust, informed by analysis and science and consider various elements such as the previous PIRSA Primary Production Priority Areas work (noting that this could be extended state wide) and climatic data, such as the updated Australian Rainfall and Runoff data.

In undertaking this review there is also scope to consider how to accommodate a new dwelling in the primary production landscape. There should be an imperative to protect land from inappropriate division which will result in the addition of a new dwelling where such development is removed from the operation of the land for primary production. This in turn can assist in limiting the potential for interface conflict.

- Sub-theme 2.1 Centres retail and mixed use activities (pg 57) – This discussion question focuses on centre hierarchy and the addition of residential activities within centres. Councils view of the role of centre hierarchy is noted earlier, however it is recognised that there is value in the provision of policy which facilitates residential development within retail centres. This mixed-use approach adds vibrancy and variety and can be accommodated best in mixed-use type developments (e.g. shop-top forms of development).
- Sub-theme 3.2 Adaptive reuse (pg 61) – The adaptive reuse of unused farm houses is a complex question. Anecdotally, Council officers understand that many farming families seek to consolidate their land holdings to remain viable and many of these holdings feature unused farm houses. Further, when seeking to grow their property holdings the inclusion of a dwelling, whether unused or not, can artificially inflate the price of the property. However, Council is cautious of any approach to allow the division of land to create isolated small allotments comprising unused farm houses, many of which are often within their own allotment and placed quite a distance from roads and infrastructure. It is noted that there is significant potential for interface conflict which is difficult to adequately manage, and there is a need to be recognise the impact of primary industries and provide adequate protection for these areas to allow land owners to effectively operate their businesses.

Finally, it is not clear how any future amendments in this space would affect the Light Regional Council, nor any of the other Councils located within the Environment and Food Production Areas or Character Preservation Districts given that the legislative basis of these prohibits division of land for residential purposes.

Thank you again for the opportunity to provide comments with respect to these matters. If you have any questions or would like to discuss the content of this letter, please contact the undersigned at [REDACTED] or on [REDACTED].

Yours sincerely,



Andrew Chown
Manager, Strategy