

D18/56948

30 November 2018

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**State Planning Commission  
PO BOX 1815  
ADELAIDE  
SA 5001**

Dear Sir / Madam,

**RE: NATURAL RESOURCES AND ENVIRONMENT POLICY DISCUSSION PAPER**

Thank you for the opportunity to provide feedback on the State Planning Commission policy discussion paper 'Natural Resources and Environment'.

Adelaide Plains Council (APC) provides the following feedback on the Discussion Paper:-

**THEME 2: Water Security and Quality**

**Should dams be assessed as development in the planning system?**

Dams should be assessed as development where the dam is to be built on flood prone land and will include banks or levees raised above ground level or where it is proposed that excavated fill will be retained on site. In-ground dams, even in the floodplain are considered low risk. Dams with raised banks or levees could impact upon the flood flow path affecting neighbouring land or properties so should always be assessed as development. Such dams should be subject to a hydrological engineering assessment to ensure that there are no negative impacts from altered drainage patterns on adjoining properties.

In the case of dams not located in flood prone areas, dams over a certain size should be assessed as development. Dams can be extremely large structures and depending on their design they can have a significant visual impact within a locality. Dams can include significant banks, mounds and levees, the design and appearance of which should be assessed in respect of the local environment.

Development approval for a dam should occur in addition to any considerations from the Natural Resources Management Act 2004 (and the proposed Landscape South Australia Act) as the NRM only consider the impact of a dam as a water affecting activity and do not consider visual amenity considerations.

## THEME 4 Coastal Environments

### **What level of development (including accommodation) is appropriate for a Coastal Conservation Zone?**

Areas zoned for Coastal Conservation are intended to enhance and conserve the natural features of the coast and therefore only low-intensity uses and development should be located in such locations.

Agricultural and low impact aquaculture activities may be appropriate in the Coastal Conservation Zone, as could a limited level of nature based tourism such as eco-huts which are designed to have a minimal impact on the environment and should ideally have a direct link to conservation i.e. ecotourism.

Coastal Conservation Zones are currently separate from Coastal Settlement Zones in South Australia and as such, coastal settlements should continue to be the focal point for coastal related developments, including tourist accommodation facilities, to ensure that the majority of the coastline is conserved from an environmental perspective.

Tourist accommodation is currently listed as a non-complying form of development in Council's Development Plan and we would support this being removed and assessed under a performance assessed development process, provided appropriate controls are included within the Code to restrict its impact on the natural environment.

### **Does current planning policy adequately address the risk of new development from climate change impacts (coastal retreat, sea level rise and storm surges, etc.) for at-risk coastal settlements?**

Council's current Development Plan policy does not address the risk of new development from climate change impacts within its coastal settlements. However, all applications for new development along the coast are referred to the Coast Protection Board who provide up to date conditions for new development based on the predicted impacts of climate change.

It would be preferable if policy guidelines from the Coast Protection Board, such as required finished floor levels, were provided through the Code to prevent the need for referrals. However, a coast-wide strategy is needed for the whole state to ensure that a consistent approach to development is made. For example, if there is consensus that particular 'at-risk' coastal settlements should be retreated, then appropriate policy should be prepared at the state level to ensure that local government is able to apply a consistent approach to development in their Council area.

If coastal retreat is not considered a necessary response from a planning policy perspective, appropriate state wide policy for new development in these locations (finished floor levels,

access, restrictions on build structures/materials) will be needed to ensure assessment is appropriate to manage the risks of climate change and ensure consistency state wide.

#### **THEME 5: Natural Hazards**

#### **Should flood risk categories be based on physical (depth and velocity) and function and isolation risk factors?**

The flood risk categories used within the Code should reflect current best practice i.e. Handbook 7 of the Australian Disaster Resilience Handbook 'Managing the floodplain: a guide to best practice in flood risk management in Australia' (2017). Flood hazard is generally based on the depth and velocity of flood waters. Floodplain areas can be classified in regards to isolation and access considerations but this is unlikely to have been taken into account in most Council prepared flood data. It is usually considered at the detailed assessment stage by a qualified hydrological engineer who is able to take local conditions into account when assessing the level of flood risk as a result of a new development.

Should you require any further information from Council or have any queries regarding this consultation submission, please contact Megan Lewis, Planning Policy Officer on [REDACTED] or [REDACTED].

APC looks forward to further engagement opportunities with the State Planning Commission throughout the transition to the new PDI Act.

Yours faithfully,



Robert Veitch  
**General Manager – Development and Community**