



Cherry Growers  
Association of SA



Apple and Pear Growers  
Association of SA, Inc.

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Mr Michael Lennon  
Chair – State Planning Commission  
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**Joint Submission from Apple & Pear Growers Association of SA and Cherry Growers Association of SA on the revised draft Planning and Design Code (Phase 3)**

Dear Mr Lennon,

The Apple & Pear Growers Association of South Australia (APGASA) and Cherry Growers Association of SA (CGSA) represent the state's apple, pear and cherry growers, with a combined farmgate value of \$60 million. The majority of production occurs within the proposed Adelaide Country Zone.

APGASA and CGSA commend the State Planning Commission and staff at Planning and Land Use Services for implementing a number of improvements in the latest version of the draft Planning and Design Code.

Key improvements from the state's apple, pear and cherry industry's perspective include:

1. The removal of the Sloping Land overlay.
2. Removal of key overlays applied to Protective tree netting structures to allow the draft Code to be a "like-for-like" transition from the current Development Regulations.
3. The separation of Rural Industry into small-scale industry and expansion of established small-scale or new large-scale industry to allow for efficiencies in operation commensurate with modern agricultural practices.
4. The adjustment of Beverage Production in Rural Areas into more refined categories.
5. The inclusion of storage, produce grading and packing into Rural Industry.
6. The removal of Native Vegetation and Water Resources overlays for Water Tanks.

However, there are also a number of critical concerns that still remain that have potential to have significant impact on future development capacity within the apple, pear and cherry industries.

### **Horticulture**

There does not appear to be a Deemed to Satisfy pathway for horticulture in the Adelaide Country Zone, Rural Zone or Rural Horticulture Zone. This is largely due to the Prescribed Water Resources Area Overlay and other water related overlays forcing horticulture into a Performance Assessed Pathway.

In addition to this, as previously highlighted, the DTS criteria for Horticulture are not well refined and excessive. As an example, DTS/DFP 3.1 stipulates a slope not greater than 10% and not within 50m

of a watercourse or native vegetation. This is also carried over into DTS/DPF 3.8 within the Mount Lofty Ranges Catchment Areas Overlays. These criteria are excessive and would preclude a significant portion of current horticultural developments and potential area in which future developments could occur. They also do not take into account modern horticultural practices and do not appear to be developed on a strong evidence-basis.

It is overly burdensome to force horticultural developments into Performance Assessed pathways, particularly when so much effort has gone into creating streamlined pathways for urban developments and when other developments such as farming are also afforded streamlined pathways. Further, with very restrictive DTS/DPF criteria, developers would potentially be required to invest significant effort into demonstrating that the performance outcomes can be still be met for what should be considered straightforward developments.

### **Shops, Tourism and Function Centres**

The inclusion of a streamlined development pathway for shops, tourism and function centres within the Adelaide Country Zone is welcomed. However, some of the DTS/DPF criteria are very limiting, including unreasonable restrictions on gross leasable floor areas, accommodation areas, seat numbers and display areas external to a building. Further consideration should be given to these criteria to enable more reasonable developments commensurate with industry requirements.

### **Summary**

APGASA and CGSA would welcome the opportunity to work with the State Planning Commission and Planning and Land Use Services to refine the approach to horticultural developments and ensure that the new Planning and Design Code does not impose unnecessary limitations to future horticultural growth and development.

Best regards,



Susie Green  
CEO Apple & Pear Growers Association of South Australia  
EO Cherry Growers Association of South Australia