



**Regional Planning
Directions**

planning • policies • projects

18th December 2020

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Chairman
State Planning Commission

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Dear Michael,

RE: SUBMISSION ON PHASE 3 OF THE PLANNING & DEVELOPMENT CODE

This submission has been prepared by Regional Planning Directions on behalf of a group of landowners who farm near Mallala in the Adelaide Plains Council area.

Background

Broad-acre farming in the Adelaide Plains Council area has been the mainstay of local economies for many decades.

In the past, it has benefitted from relative lack of competition for land compared to other peri-urban areas, maintaining flexibility for farm businesses to grow and adapt.

Aside from the rural living zone in the south of the Council area, and a relative absence of land use interface conflicts advantaged the productivity and longevity of farms.

The Gawler River for a long time served as a rough dividing line between dryland agriculture and horticulture. However, the Development Plan promotes horticulture throughout the Primary Production Zone (see **Appendix 1**), as a result on a 2018 amendment.

Recent investigations and the testimony of members of the local farmers group, indicates this poses significant challenges for the future of broad-acre cropping and farming on the Northern Adelaide Plains, including some of the best grain-growing land in SA.

This submission identifies conflict between State Government strategies promoting potentially ad-hoc development of chemical-sensitive uses such as open air and enclosed horticulture north of the Gawler River, and protection of a strategically-recognized 'major grain area'.

The Planning strategy supports protection of the 'major grain area', an area of better soils and rainfall than most of the State's (limited) agricultural land. Adding to the rationale for protection of this strategic cropping is a likely contraction of the area of viable agricultural land in South Australia due to climate change.

Issues

Following approval of a large enclosed horticulture facility for Agrisano in the Primary Production Zone on Wasleys Road east of the township of Mallala, Regional Planning Directions conducted a workshop with rural landowners, some of whom own and farm nearby properties. Participants highlighted that both open air and enclosed forms of horticultural development, including hydroponics, have a wide range of implications for broad-acre farming in an area (most of Adelaide Plains Council area) where it is currently the dominant land use.

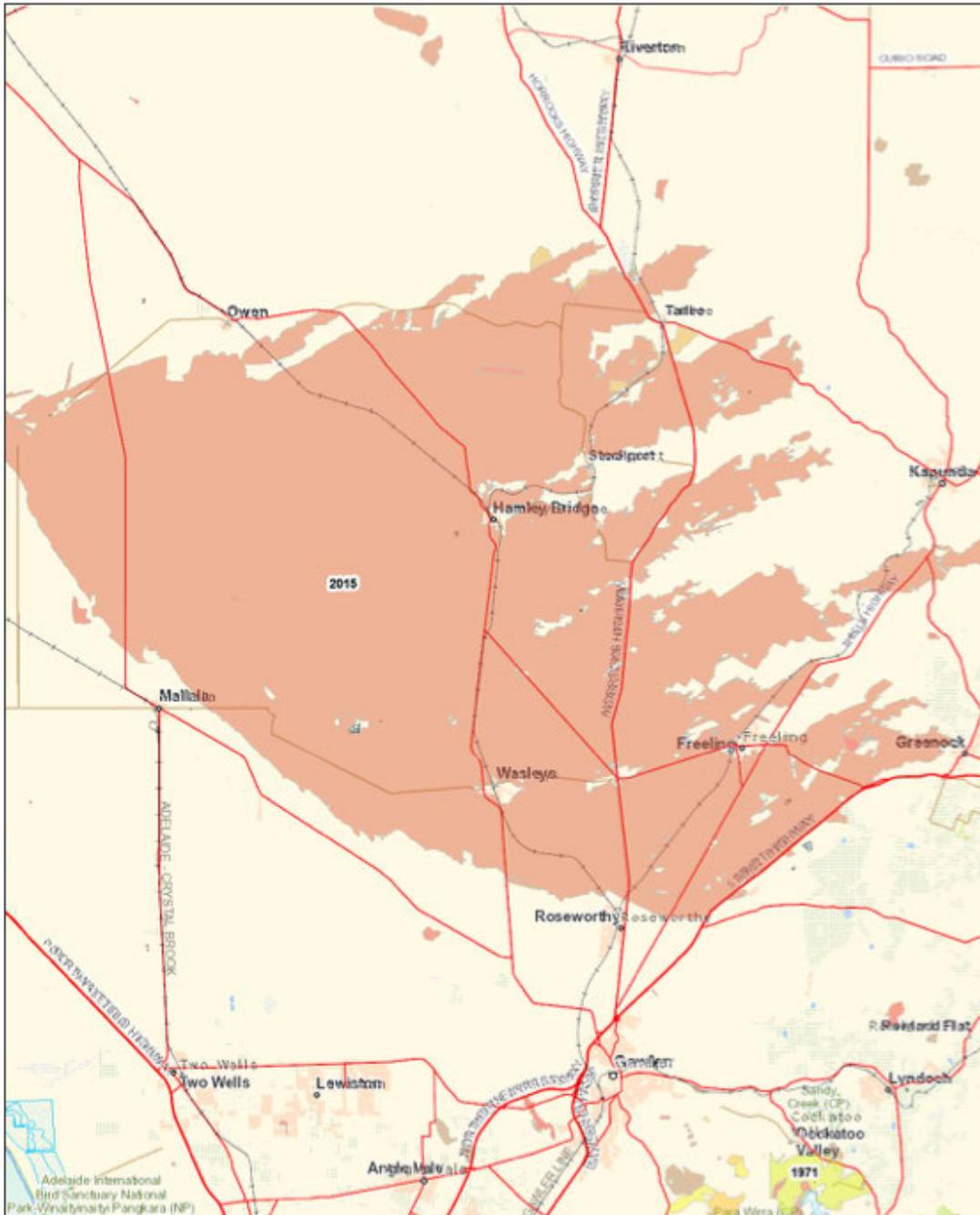
The following issues were identified:

1. Increased competition for use of finite high-quality agricultural land affects the viability of broad-acre farms, especially if new entrants can pay more for land than broad-acre farm enterprises. In peri-urban areas, there is a high risk of inflationary and other pressures associated with urban, lifestyle, or other alternative land uses and in-migration eroding the efficiency and viability of farm businesses. Existing zoning policies for the Northern Adelaide Plains generally limit the influence of the urban / rural living property market, and associated secondary negative effects on farm efficiency, productivity and viability. Yet, land acquisition and development for more intensive forms of primary production supported by these policies, and infrastructure investments like the Northern Adelaide Irrigation Scheme (NAIS), may have some similar impacts. If those wanting to buy land are mostly broadacre farmers, then the rural trend towards aggregation of farms and a decline in population may be counter-balanced by gains in farm efficiency, productivity and innovation (Barr, 2003). Under different real estate market conditions, the long-term viability of those farms can be quickly eroded.
2. Climate change globally and regionally is likely to enhance the value of an increasingly constrained area of better quality land for soil-based primary production, such that sound management and land use planning of these areas – comprising only a small percentage of SA - is critical to the State's agricultural future.
3. Open air and enclosed horticulture are chemical-sensitive land uses. If developed in an ad-hoc or leapfrog manner, they have the potential to reduce the efficient operation of many more broad-acre farms using chemical sprays than would a compact expansion of horticultural uses. These issues were addressed in the report of a PIRSA Working Party (2017), but essentially are unresolved.
4. Hydroponic horticulture should not occur in high value cropping areas and should only be considered in marginal cropping areas. The area of southern Spain with a large concentration of hydroponic horticulture is unsuitable for dryland cropping. It receives a far lower mean annual rainfall than the Northern Adelaide Plains (as does the site of the hydroponic 'Sundrop Farms' near Port

Augusta). The 2015 Broadacre Agriculture Study commissioned by the Adelaide Plains Council identified an area for non-soil based irrigated horticulture west of Port Wakefield Road and Two Wells.

5. There is a need to provide for restoration of land to suitable soil-based agriculture should hydroponic horticulture prove to be commercially unviable and/or is decommissioned. A policy in the existing Planning and Design Code provides for rehabilitation in decommissioning of a renewable energy facility. A parallel policy for hydroponic horticulture is appropriate given the potential to curtail and reduce soil-based agricultural production (at least to a similar extent to solar farms, possibly more so in the Adelaide Plains Council area).
6. While it is acknowledged that horticulture on the Northern Adelaide Plains is using treated urban waste water and, in doing so, is reducing demand on existing water resources and disposal into Gulf St Vincent, there are also issues with various kinds of waste, including waste water and plastics, generated by horticultural developments that need to be addressed by planning and/or environmental authorities. The salinization of rising water tables associated with disposal of irrigation and storm-water has potential to impact agriculture, and it is noted that the City of Playford has identified this issue and recommended policy remedies in its submission on the draft Code.
7. The high cost of connecting to Bolivar treated water (and perhaps also of desalinization) for the average horticultural operator was also cited. This would tend to favour a few operators who are in a position to out-bid others for land as well as pay for the water supply.
8. Other issues associated with intensive horticulture include:
 - additional traffic generation in a rural area;
 - wear and tear on a substantially unsealed local road network (Adelaide Plains Council area);
 - noise, light and other impacts associated with all-hour operations;
 - management of fire risk given expansive plastic enclosures, potentially high speed of grass fires under extreme conditions, and potential presence of a large workforce potentially unfamiliar with this particular fire hazard.

The map below depicts the extent of the Pinery fire that almost certainly would have destroyed any horticultural plastic enclosures in its path.



9. Planning for worker's accommodation in Mallala and/or other centres, given that there is at present, a lack of suitable accommodation.
10. The potential for an incremental loss of the very open rural character which is a distinctive feature of dryland cropping and farming areas in contrast to the untidy, peri-urban horticultural character that has developed around Virginia.
11. Capacity to help resolve land use interface conflicts through public notification and participatory processes. (See section on PIRSA Working Group Report below.)

The local farmers feel acutely vulnerable to combinations of these potentially impacts.

Strategic Directions for Northern Environment and Food Production Areas

Adelaide Plains Council and Light Regional Council share part of a significant grain-growing region, the southern margins of which are within the legislated Environment and Food Production Areas and the Greater Adelaide Region – see **Appendix 3**.

This area is the closest high-quality grain producing land to urban areas of Adelaide.

The Environment and Food Production Areas were introduced by the Planning, Development and Infrastructure Act 2016 to protect valuable agricultural assets, as well as tourism and environmental assets, and promote a more compact urban form.

The stated intent of Environment and Food Production Areas is to:

- protect rural, landscape and environmental areas from urban encroachment
- encourage consolidation within the existing urban footprint and renewal of existing urban areas
- ensure that any expansion of the urban footprint is made transparently and based on agreed evidence
- help prevent ad hoc land use changes that may compromise investments that rely on the maintenance of those rural landscape and environmental areas. (State of SA, 2017)

The State Government's Planning Strategy is intended to guide the formulation of development policy (before in Development Plans, now, the Planning and Design Code).

The relevant Planning Strategy provisions are in the 2017 Update of the Greater Adelaide Plan, and include a map (p.157) showing generalized current primary production areas including grain production areas and potential significant primary production areas. (All are with the legislated Environment and Food Production Areas.)

Much of the rural land in the Adelaide Plains Council area to the east of Port Wakefield Road, and in the Light Regional Council, corresponds with both "grain production areas" and "potential significant primary production areas".

Primary Production Policies include:

P57. Maintain and protect primary production and tourism assets in the Environment and Food Production Areas, while allowing for appropriate value-adding activities to increase investment opportunities.

P58. Ensure that the Environment and Food Production Areas, Character Preservation Districts and planning policies work in an integrated way to:

- protect key primary production assets and opportunities
- facilitate local operating and investment conditions that support primary production and related agri-business development
- enable timely business adjustment and climate change adaptation by primary producers.

P59. Enable major new primary production and agri-business development across the Northern Adelaide and Barossa regions and in the Mount Barker-Murray Bridge

corridor and prevent ad hoc land use changes that may compromise those investments.

P60. Ensure land use planning in and around the Virginia horticulture district aligns with projects for industry growth and revitalisation anticipated by the Northern Economic Plan.

The Northern Economic Plan supports the Northern Adelaide Irrigation Scheme (NAIS) as part of an economic priority for “Premium food and wine produced in our clean environment and exported to the world”.

Through SA Water, this entails a commitment to invest \$110 million to expand Northern Adelaide Plains irrigated food production. With significant funding (\$46m) through the Federal Government’s National Water Infrastructure Development Fund, Stage 1 will deliver an additional 12 gigalitres a year of recycled water from the Bolivar Waste Water Treatment Plant, via an expanded irrigation distribution network.

Barossa Directions Map of the 2017 Update (p. 160, Addendum) reinforces the need to: “Protect major grains areas” – including areas on the Northern Adelaide Plains likely to be affected by expansion of the recycled water distribution network and horticulture.

The approved Agrisano enclosed horticultural development in a grain cropping landscape near Mallala, highlights un-resolved tensions in these strategies.

While it is not the purpose of this submission to comment on an individual application, a first incursion of a new use in an area presents an opportunity to reflect on the potential for incremental and other effects on existing land uses and the biophysical and social environment if the proposed development is representative of an emerging trend.

As the planning report prepared for Agrisano by Masterplan (2020) notes:

“Horticultural development (including enclosed horticulture), as proposed, is a specifically envisaged land use within the Primary Production Zone, as specified in the Desired Character Statement and Principle of Development Control (PDC) 1 of the Zone policies.”

Impervious elements of the Agrisano development will comprise of a total of 28.47 hectares of the site, accounting for approximately 37 percent of the total site area. The development includes ten greenhouse occupying 2 hectares each, as well as a nursery. Buffers are provided within the site, with minimum separation distances from roads (350m) more generous than those from neighbouring properties.

The site is approximately 8 km from the nearest point of the established Horticulture Policy Area of the Adelaide Plains Council Development Plan – or the Rural Horticulture Zone in the proposed Planning and Design Code. It would be more rational to support compact extensions of horticulture within horticulture zones or sub-zones than a wider dispersal through the broad-acre farming areas beyond.

The dispersed alternative creates higher potential for edge effects, and reduced certainty and flexibility for broad-acre farming enterprises.

Review of 2017 PIRSA Working Party Report

The potential for conflict on the Northern Adelaide Plains as new ‘chemical-sensitive’ land uses such as open air and enclosed horticulture and viticulture are introduced into a broad-acre farming landscape was identified in the Report of the PIRSA Buffers Working Group (2017).

The PIRSA working group comprised members from Local Government (Light Regional Council and Barossa Council), State Government agencies (DPTI, EPA, PIRSA), and Industry Groups (Primary Producers SA and Grain Producers SA).

The Adelaide Plains Council Northern Food Bowl Protection Areas DPA (in Statement of Investigations) also recommended “the inclusion of additional local policy content which specifically addresses a need for new entrants to manage spray drift and the associated buffers on their land, which in turn recognises current land uses and the important of land use continuity”.

The PIRSA Working Group examined conflict reported between new viticulture and established farm businesses in the western Barossa region, and identified the potential for similar conflict on the Northern Adelaide Plains:

“The consequences of failing to adequately manage agricultural land use change will be most evident in regions where new, chemical-sensitive land uses are seeking to expand alongside established farm businesses that routinely use rural chemicals: regions such as the Northern Adelaide Plains.”

In relation to the interface issues investigated in the western Barossa, the Working Group commented as follows:

“The Working Group was satisfied that establishment of vineyards adjacent to cropping land does, indeed, inconvenience farmers and spray contractors; and that this inconvenience may have significant operational and business effects well beyond the simple loss of productive area associated with new spray drift risk management obligations. The Group heard from farmers that these obligations, triggered by the establishment of vineyards on adjoining land were: 1) disrupting timely spray operations and creating logistical problems for contractors; 2) requiring use of more expensive chemicals; and 3) compromising weed management strategies, crop hygiene, prices received and insurance status, all of which affect farm-business competitiveness. It also heard from consultants and received documentary evidence regarding the dimensions of these business consequences.

Furthermore, members of the Working Group noted farmers’ perceptions of increased exposure to litigation over crop damage and prosecution for non-compliance. They also acknowledge that there is an important ‘natural justice’ dimension here, as recognised by the Select Committee; and that these situations can be very stressful for the affected parties and have taken a significant toll on a number of families.”

The Working Group considered “the implications are sufficiently relevant to evolving parts of SA’s farm sector that a number of targeted initiatives are appropriate”.

The Working Group’s recommendations included:

- New planning procedural arrangements for involving appropriately qualified and experienced farm sector consultants in the assessment of development applications for chemical-sensitive land use change. This was considered to have “advantages over conventional planning measures within the SA planning system, such as Category 2 notification status, which assumes a capacity on the part of planning officers to interpret the technical dimensions of applications for primary production development”.
- Formulation of the Planning and Design Code and State Planning Policies should give careful consideration to the formulation of the development pathways for rural and agricultural development, including ‘deemed to comply’ standards and public notification arrangements for Primary Production (Rural) Zones.

The proposed new planning procedure and specific policy remedies to address interface issues between broad-acre farming and chemical sensitive horticulture in the Planning and Design Code (including draft Phase 3) do not appear to exist.

Review of Mallala Broadacre Farming Study

In 2015, Planning Aspects undertook a detailed study for the Adelaide Plains Council to assist in identifying a potential boundary between broad-acre farming and irrigated horticulture.

A multi criteria (economic, social and environmental) assessment was undertaken as part of this study.

The study found that land to the north of the Light River is ideally suited to broad-acre farming activities, and recommended that this area should be zoned accordingly.

The study identified approximately 16,350 hectares of land that could be made available and dedicated to irrigated horticulture activity in the southern portion of the Council in and around Lewiston, Two Wells and the Gawler River – south of the Light River - where irrigated horticulture is ideally located. Using the Light River as a boundary would assist in the establishment of a naturally occurring buffer that will allow separation distances to be created between the different farming practices.

The study also identified:

“...an area in the south west of the council area “where soil and environmental constraints do not lend themselves to irrigated horticulture notwithstanding the availability of water for cropping purposes. For this reason this study recommends that this area be considered for hydroponic or non-soil based horticulture...It is therefore recommended that planning policy be established to facilitate this activity.”

As regards land use definitions governing primary production activities, the study found these to be outdated and limiting, and argued that horticulture definitions should differentiate between soil-based and hydroponic horticulture.

It is noted that the Land Use Definitions in the draft Planning and Design Code do not adopt this approach. There is also ambiguity in the definition of an Agricultural Building.

Such a building can be in association with horticultural activity yet it is not clear from the definition (including the Inclusions and Exclusions) if it includes greenhouses. This has potential to be the source of confusion given that different separation distances are specified for an Agricultural Building and Horticulture - in the proposed Rural Zone for example.

The study noted that:

“Irrigated horticulture has a significant demand for electricity and gas associated with irrigation, heating, pumping and lighting which vary seasonally. Broadacre farming does not have this same demand for electricity and gas that would materially impact on profitability.”

“...Irrigated horticulture has greater reliance on good quality roads for the supply of produce to markets than broadacre markets.” (p.25)

Review of Draft Planning and Design Code (Phase 3) Provisions

A draft Phase 3 of the Planning and Design Code was released by public comment by 18 December 2020.

It is noted that the relevant provisions are found in the General, Zone and/or Overlay sections of the Planning and Design Code, and in the event of conflict, the Zone provisions prevail over the General, and the Overlay provisions prevail over all others.

The existing Primary Production Zone which covers most of the Adelaide Plains Council area (see **Appendix 1**) is to be converted into two Planning and Design Code Zones, the Rural Zone and the Rural Horticulture Zone (see **Appendix 2**), with the latter encompassing the existing extent of the Horticultural Policy Area (as extended in 2018).

The proposed Rural Zone in Adelaide Plains Council is wholly within the legislated Environment and Food Production Areas (see **Appendix 3**), represented as the Environment and Food Production Overlay in the draft Code.

While the proposed Environment and Food Production Overlay has the following Desired Outcome, the specific provisions apply only to land division:

DO 1 Protection of valuable rural, landscape, environmental and food production areas from urban encroachment.

The Rural Zone has the following Desired Outcomes:

DO 1 A zone supporting the economic prosperity of South Australia primarily through the production, processing, storage and distribution of primary produce, forestry and the generation of energy from renewable sources.

DO 2 A zone supporting diversification of existing businesses that promote value-adding such as industry, storage and warehousing activities, the sale and consumption of primary produce, tourist development and accommodation.

The following Performance Outcomes provides a general indication of uses deemed appropriate within the Zone [highlighting added]:

PO 1.1

*The productive value of rural land for a **range of primary production activities** and associated value adding, processing, warehousing and distribution is supported, protected and maintained.*

DTS/DPF 1.1

Development comprises one or more of the following:

Advertisement

Agricultural building

Brewery

Carport

Cidery

Dairy

Dam

Distillery

Dwelling

Dwelling addition

Farming

Horse keeping

Horticulture

Industry

Intensive animal husbandry

Low intensity animal husbandry

Outbuilding

Renewable energy facility

Shop

Small-scale ground mounted solar power facility

Stock slaughter works

Tourist accommodation

Transport distribution

Verandah

Warehouse

Winery

Workers' accommodation

Farming, but not horticulture, is Accepted Development in Table 1 of the Rural Zone.

Horticulture, however, is included as a Deemed to satisfy development in Table 2 and subject to only limited provisions.

Of particular concern is the fact that the draft Planning and Design Code lacks a policy dealing with spray drift where this may affect horticulture - despite the 2017 PIRSA Working Party recommending that this issue be addressed in development of the Code. This type of land use interface issue is addressed only for urban uses and limited 'sensitive receivers' (a defined term which excludes horticulture).

The only Deemed to satisfy policies applicable to horticulture are as follows:

RURAL ZONE Siting and Design

DTS/DPF 2.2

Buildings:

- are sited on land with a slope not greater than 10% (1-in-10)
- do not result in excavation and filling of land greater than 1.5 metres from natural ground level.

RURAL ZONE Horticulture

DTS/DPF 3.1

Horticultural activities:

- (a) are conducted on an allotment with an area of at least 1ha
- (b) are sited on land with a slope not greater than 10% (1-in-10)
- (c) are not conducted within 50m of a watercourse or native vegetation
- (d) are not conducted within 100m of a sensitive receiver in other ownership
- (e) provide for a headland area between plantings and property boundaries of at least 10m in width
- (f) where carried out in an enclosed building such as a greenhouse, the building has a total floor area not greater than 250m²
- (g) where in the form of olive growing are not located within 500 metres of a conservation or national park.

GENERAL PROVISIONS Interface between Land Uses [Activities Generating Noise or Vibration]

DTS/DPF 4.1

Noise that might affect sensitive receivers achieves the relevant Environment Protection (Noise) Policy criteria.

It is deeply problematic that these are the only provisions to apply to a Deemed to satisfy horticultural development. It means there is no scope for consideration of identified issues such as potential chemical spray-drift impinging on new forms of primary production (horticulture, including hydroponics), the intensity of development, or the direct and indirect effects of fragmentation and displacement of broad-acre farming.

This results in very unrestrained scope for horticultural expansion in a major grain area (mainly in Adelaide Plains Council and Light Regional Council areas) that the Planning Strategy for Greater Adelaide seeks to protect.

The draft Code offers no framework for resolving a land use interface conflict issue on the Northern Adelaide Plains associated with irrigation expansion, anticipated by the 2017 PIRSA Working Group report.

The assessment provisions that apply if a Horticulture Development is not classified as Deemed to satisfy are somewhat broader in scope, but not sufficient:

PO 3.1

Horticulture is located and conducted on land that has the physical capability of supporting the activity and in a sustainable manner that:

- enhances the productivity of the land for the growing of food and produce in a sustainable manner*
- avoids adverse interface conflicts with other land uses*
- utilises sound environmental practices to mitigate negative impacts on natural resources and water quality*
- is sympathetic to surrounding rural landscape character and amenity where horticulture is proposed to be carried out in enclosed buildings such as such as greenhouses.*

The Rural Zone provisions are very similar to those for the Rural Horticulture Zone, other than at the level of the Desired Outcomes (see table below).

RURAL ZONE - DESIRED OUTCOMES	RURAL HORTICULTURE ZONE - DESIRED OUTCOMES
DO 1 A zone supporting the economic prosperity of South Australia primarily through the production, processing, storage and distribution of primary produce, forestry and the generation of energy from renewable sources.	DO 1: Intensive agriculture in the form of horticulture and associated value-adding enterprises and activities.
DO 2 A zone supporting diversification of existing businesses that promote value-adding such as industry, storage and warehousing activities, the sale and consumption of primary produce, tourist development and accommodation	DO 2: The establishment of appropriately scaled industries for washing, processing, bottling and packaging primary produce and servicing and supporting horticulture.
	DO 3: Manage interface conflict between horticulture and other land uses.

The Rural Zone Desired Outcomes does not indicate whether a particular form of primary production or rural character is preferred. As a consequence, the Rural Zone offers limited policy certainty to broad-acre farmers (and secondary processing industries) that soil-based agriculture is the preferred use of strategically important cropping land.

The Rural Zone is by far the most extensive and geographically diverse of the rural zones in the Planning and Design Code outside the Phase 1: Outback area. It covers lands of

diverse agricultural capability and mean average rainfalls ranging from below 250mm to above 700mm, extending from the edge of the Outback to peri-urban Greater Adelaide.

It is virtually impossible to adequately represent a range of context-sensitive issues in a simple set of uniform provisions across this large zone. Some context-sensitive issues, like those that are characteristic of peri-urban areas of agricultural value, have profound implications including for agricultural interests.

The applicable Overlays also fail to adequately protect broad-acre farmland and enterprises from a full range of peri-urban or comparable pressures including the influence of developments promoted by the Northern Adelaide Irrigation Scheme. As mentioned earlier, the Environment and Food Production Overlay covers the majority of the Northern Adelaide Plan and other peri-urban areas, yet the Overlay provisions only apply to Land Division.

The proposed **Kangaroo Island Sub-Zone** of the Rural Zone includes the following Desired Outcome and Performance Outcomes:

DO 1: Primary production and associated uses that support and conserve the Island's economically, scenically and culturally important natural and rural landscapes.

PO 1: Land use intensity restrained to conserve and enhance the natural and rural character.

PO 2: Development in the form of the following not undertaken:

commercial forestry

large scale industry, storage, distribution, warehousing

biodiversity planting, except where reasonably required, without compromising the land for farming and horticultural use.

This Sub-Zone adopts a more restrictive approach than standard Rural Zone provisions.

A Sub-Zone offering better protection for ongoing dryland farming (and associated secondary industries) in the portion of the Rural Zone in the Adelaide Plains Council area is warranted.

A Sub-Zone ideally would apply to priority dryland primary production areas identified by PIRSA (or perhaps other experts in the field) and not be confined by existing local government or planning boundaries. This would be established in selected peri-urban parts of the Rural Zone, not the Rural Horticulture Zone, based on land capability analysis.

However, it is beyond the scope of this submission (given limited timeframe) to undertake that kind of spatial analysis in order to delineate Sub-Zone boundaries.

A Sub-zone specific to the Adelaide Plains Council portion of the Rural Zone is recommended to address the vulnerability of broad-acre farm land and enterprises to immediate pressures from ad-hoc development, and as a measure that can be quickly implemented via amendment of the draft Code.

The client's position is that the Code should constrain both new horticulture and expansion of existing uses that impinge on the proposed Sub-Zone. The recommended amendments

reflects the inevitability of variable quality of land within a Sub-Zone based on boundaries not able to be defined by expert mapping of priority areas at this point.

Instead of deferring urgent policy remedies until such mapping is available, the policy recommendations below are based on the assumption that areas of highest value for dryland cropping are already predominantly being used for this purpose.

In addition, it is noted that throughout the Rural Zone, a renewable energy facility is subject to the following provision:

PO 9.1

Renewable energy facilities and ancillary development minimize significant fragmentation or displacement of existing primary production.

A parallel policy for horticulture, especially enclosed and hydroponic horticulture, is appropriate given the potential to conflict with existing soil-based agricultural production in the Rural Zone in the Adelaide Plains Council area (and may be more widely applicable).

The Rural Planning Bulletin (a superseded rural planning guide) promoted the use of buffers including landscaped buffers to address spray drift. The 2017 PIRSA Working Party Report, however, cautioned against resort to simplified policy like standard minimum buffers to address a complex issue (though it failed to deliver alternative policy outcomes). It is also evident that landscaped buffers will have little effect until perhaps plantings have matured and they are at best a slow-acting partial remedy.

This tends to reinforce the case for differentiation of areas where certain forms of primary production has primacy, including appropriate designated areas where dryland farming has primacy, as well as the established zones or policy areas where horticulture has primacy in effect.

Recommended Amendments to Draft Code

It is recommended that the Rural Zone proposed in the Adelaide Plains Council area form a Northern Adelaide Plains Sub-Zone.

Table 2 of the Rural Zone should indicate that horticulture is not a Deemed to satisfy development in the Northern Adelaide Plains Sub-Zone.

The following Northern Adelaide Plains Sub-Zone provisions should be introduced:

Desired Outcomes

DO 1

Primary production and associated uses that support retention of an open agricultural character associated with productive soil resources.

Performance Outcomes & Deemed-to-Satisfy Criteria / Designated Performance Feature

Land Use Intensity and Compatibility with Agriculture

PO 1.1: Land use intensity restrained to conserve and promote open field agricultural use of productive soil resources.

[No DTS/DPF]

PO 1.2: Development of intensive horticulture should not be undertaken in areas used predominantly for broadacre cropping.

[No DTS/DPF]

In the General Provisions, the section headed *Interface Between Land Uses* should include provisions addressing potential conflict between broadacre cropping and primary production (primarily horticulture) that is chemical sensitive.

The existing Development Plan Principle 20 under 'Interface Between Land Uses' may be a basis for that:

"New primary production development (including open field and enclosed horticulture) should be sited and designed to ensure that it does not detrimentally impact upon normal day-to-day activities (including chemical spraying) of established primary production uses on adjoining land."

In addition, the following Performance Outcomes should be added under *Interface Between Land Uses*:

PO x.x

Progressive rehabilitation of disturbed areas, ahead of or upon decommissioning of areas used for hydroponics horticulture.

Based on consultation with the Adelaide Plains Council, it is understood that the Council's submission on the draft Code also identifies a need for more detailed 'Interface Between Land Use' provisions to improve rural uses' compatibility at interfaces.

Recommendation 1 of 2017 PIRSA Working Group Report

It is noted that Table 5 of the Rural Zone provides for public notification of horticultural development unless a development that is considered minor and not likely to unreasonably impact on the owners or occupiers of land in the locality.

While this is open to varied subjective judgement, and does not address the recommendation of the 2017 PIRSA Working Party for mediation using rural sector experts, the outcome is reasonable given the Code is bound by the Planning, Development and Infrastructure Act 2016 which does not offer a mediation option.

Conclusions

A trend to diversification of uses in a dryland farming landscape has the potential to fragment and displace dryland farming through introduction of sensitive activities likely to create need for costly adjustment of farming practices, as well as inflating the cost of extra land needed to keep farms financially sustainable.

These problems are especially acute or have the potential to become acute and problematic for the viability of many farms in peri-urban 'food bowls' such as the Food and Environmental Protection Areas of the Northern Adelaide Plains.

A 2015 study (Mallala Broadacre Farming Study) identified both a need to protect a large area for the primacy of dryland farming as well as recommending an area for hydroponics development (west of Port Wakefield Road in the SW of the Council area) on the basis of multi-criteria analysis incorporating land capability.

The provisions of the proposed Rural Zone and Food and Environmental Protection Overlay are insufficient to support the sustainability of broadacre farming enterprises in the face of land use interface conflict and increased land competition. This also potentially affects the future viability of secondary processing activities (eg. grain handling and hay processing businesses) - they also rely on protection of land resources.

For these reasons, it is recommended that a Sub-Zone of the Rural Zone is introduced to complement the allocation of a generous area for horticultural expansion in the proposed Rural Horticultural Zone with greater support for broadacre farming in areas north of the latter zone.

This will help reinforce the Rural Horticulture Zone as the main zone for horticulture, and it aligns with the findings and recommendations of the 2015 Broadacre Agricultural Study commissioned by the Adelaide Plains Council.

If you have any questions in relation to the above please do not hesitate to contact me on [REDACTED] or via email: [REDACTED]

Yours faithfully



Jim Allen

CONSULTANT PLANNER – REGIONAL PLANNING DIRECTIONS

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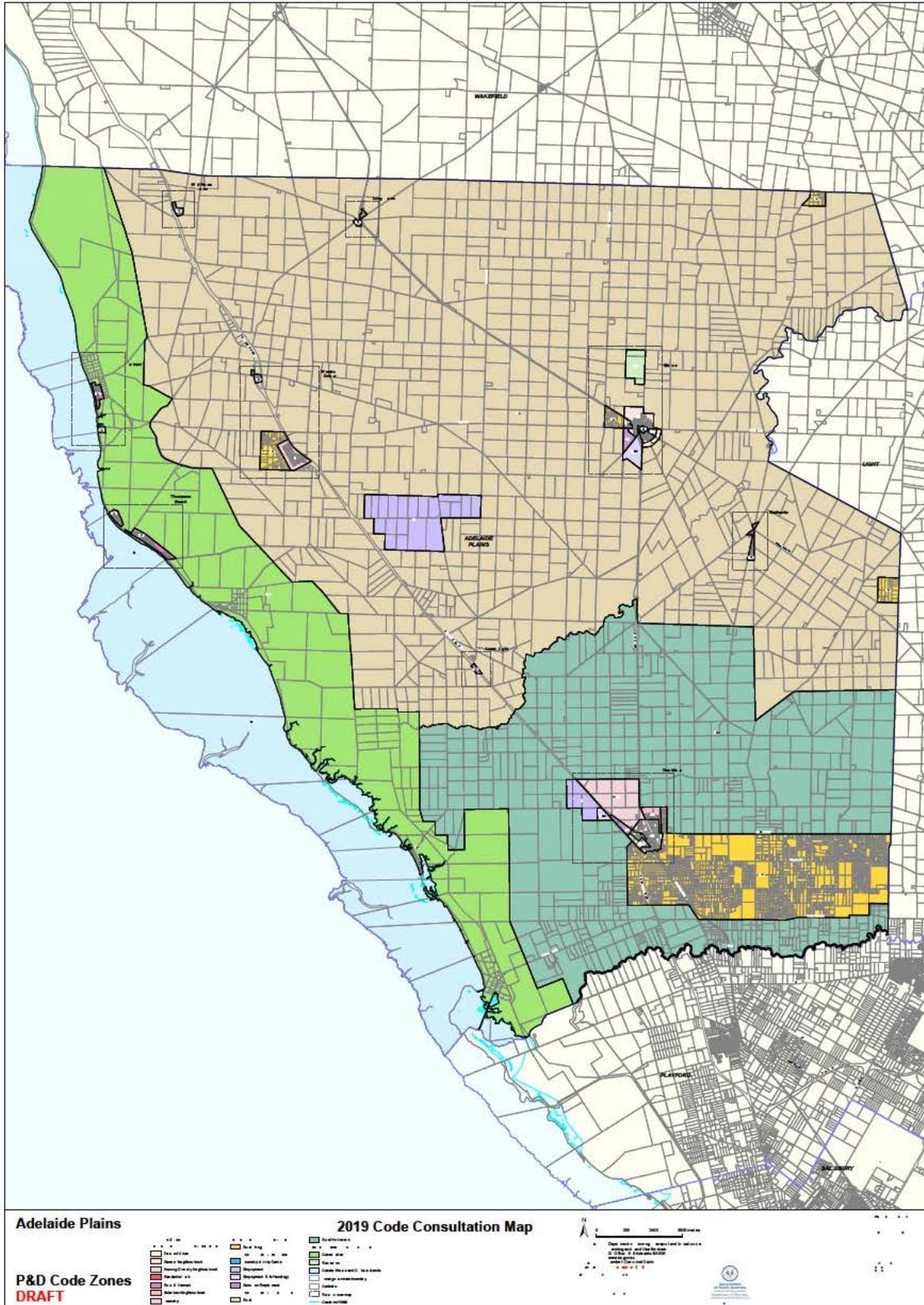
State of SA, Northern Economic Plan, 2016

Appendices:

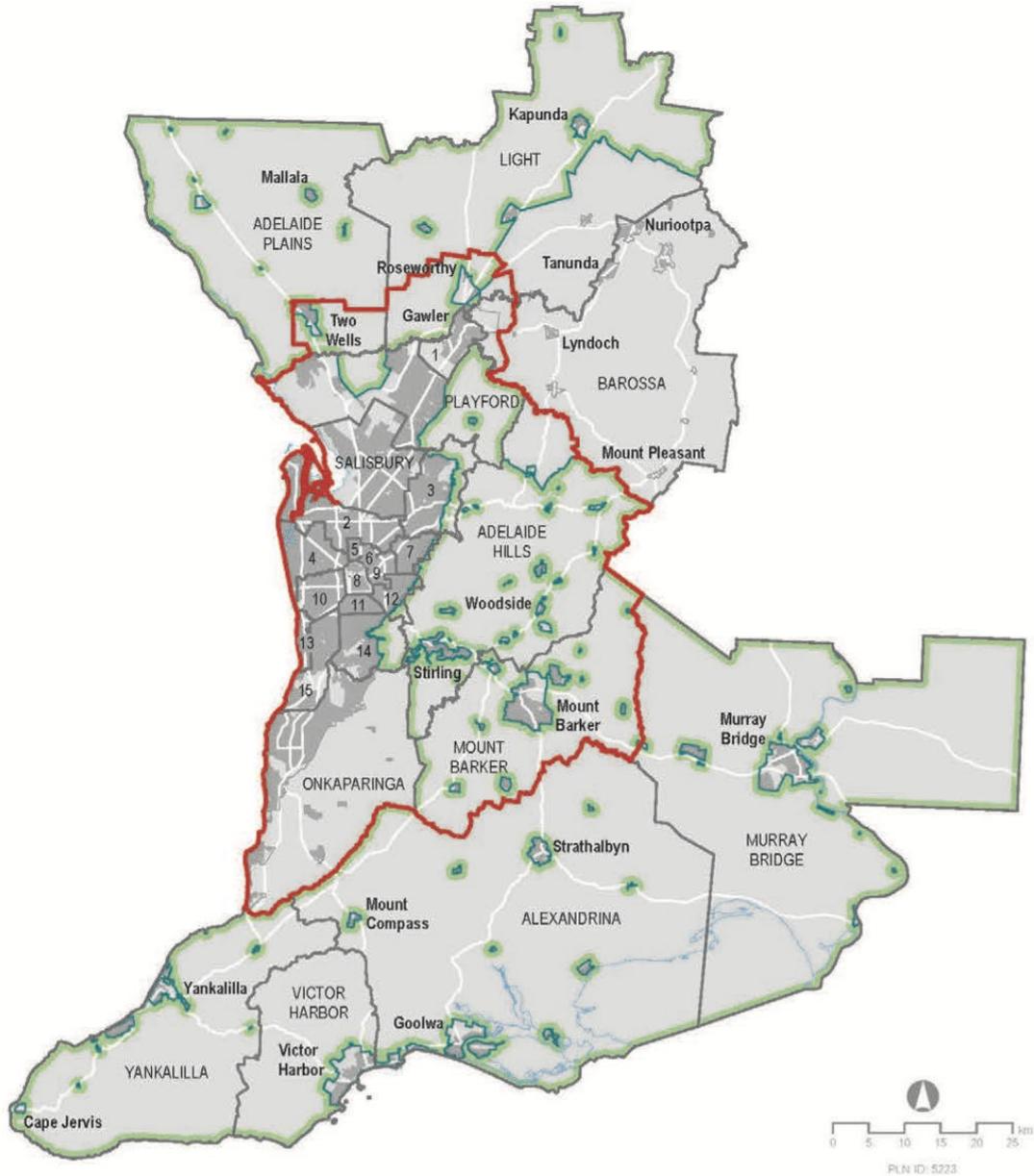
1. Existing Development Plan Zones, Adelaide Plains Council
2. Proposed Planning and Design Code Zones, Adelaide Plains Council
3. Legislated Environment and Food Production Areas

APPENDIX 2: Proposed Planning and Design Code Zones, Adelaide Plains Council

Brown = Proposed Rural Zone; Dark Green = Proposed Rural (Horticulture) Zone



APPENDIX 3: Legislated Environment and Food Production Areas



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| <ul style="list-style-type: none"> Greater Adelaide Planning Region Greater Adelaide Capital City Statistical Area - ABS (Metropolitan Adelaide) Environment and Food Production Areas | <ul style="list-style-type: none"> Local government areas constituting the Greater Adelaide Planning Region Local government boundary |
| <ul style="list-style-type: none"> 1 Gawler 2 Port Adelaide Enfield 3 Tea Tree Gully 4 Charles Sturt 5 Prospect 6 Walkerville 7 Campbelltown 8 Adelaide | <ul style="list-style-type: none"> 9 Norwood Payneham and St Peters 10 West Torrens 11 Unley 12 Burnside 13 Holdfast Bay 14 Mitcham 15 Marion |