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The Chair
State Planning Commission
Government of South Australia
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Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Chair

Submission on Assessment Pathways: How will they work? Discussion paper

Australian Pork Limited (APL) in consultation with Pork SA welcomes the opportunity to make a submission to the South Australian State Planning Commission on the *Assessment Pathways: How will they work?* Discussion paper. Considering the rate at which both technology and infrastructure are advancing across industries, APL supports the intent of the new assessment pathways to simplify the application process and streamline decision-making under a framework that is flexible and adaptable.

APL is the peak national representative body for Australian pork producers. It is a producer-owned company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

Pork production in South Australia makes a significant contribution to the state economy. Pork contributed around \$385 million (value-added) to the South Australian economy in 2015-16, representing 0.4 per cent of gross state product. The pork industry supported 2,485 full-time South Australian jobs in 2015-16 representing 0.34 per cent of all jobs in the state with these jobs generating \$188 million in household incomes.

APL makes the following suggestions to ensure the proposed changes to assessment pathways have the intended effect on the state's planning system:

- online access issues for rural and remote users must be considered
- obligations must be clearly articulated to proponents before they start the application process, with the option for proponents to request an initial face-to-face meeting with an appropriate consent authority official and
- cost savings should be passed on to applicants through reduced fees.

1. Online access in rural and remote areas

APL supports the proposed move towards a streamlined, online planning and development application process to increase efficiency and reduce burden on industry and government. However, due to lack of internet access for many rural and remote Australians, APL proposes the online system must include alternate options for those in internet poor zones.

Planning and development applications from the pork industry will be coming from pork producers residing mostly in rural and remote areas. It is a reality that access to the internet or to a quality internet connection is still unavailable on many rural properties. Even mobile phone coverage is limited outside of many townships. APL's 2017 Annual Industry Survey indicated that 39.2 per cent of respondents had on-farm internet quality that was either 'not available' (9.5 per cent) or was 'poor' or 'very poor' (26.5 per cent).

Until online access across rural and remote areas improves, moving to an entirely online application system will greatly disadvantage regional industry. Alternative options for preparing

and submitting applications must be available in the interest of fairness to rural and remote Australians at least for the foreseeable future.

2. Clearly articulated obligations

The success of the proposed online system in reducing delays, costs and inefficiencies will depend on how it is implemented. To achieve its goals, the system must clearly articulate the legislative requirements and obligations to proponents upfront, that is, before they begin the application process and submission. Information should be clear and concise and include:

- An upfront explanation of the applicant's responsibilities, timelines, reports, supporting evidence and materials and information required under each category of development.
- Enough information for applicants to determine which category of development their proposal is likely to fall into, and therefore, what kind of application process they can expect. The information should allow them to determine whether to engage a consultant, and to estimate the cost, time and preparation involved in developing the proposal, before they begin.
- Contact information including who to contact for assistance and progress updates should be provided. This should include a phone contact as well as an email address, and a hotline to obtain technical assistance.
- Easily accessible, clear and concise guidance material, definitions and explanations should be available at each step of the online application pathway at the point needed e.g. via a "help" option or an online assistant.

3. Pass on cost savings to applicants

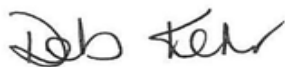
Lastly, considering the intent of the proposed changes is to streamline, simplify and increase efficiency in the assessment and application process, if successful, this should result in significant cost savings to government. APL submits that these savings should be passed on to businesses and industry via reduced planning and development application fees. This is only fair and will contribute to reducing costs that individual businesses face in the development and planning process.

In Summary

APL supports the proposed new planning and assessment pathway provided that the issues raised in this submission are addressed to reduce problems and delays due to rural and remote online access, and misunderstandings around applicants' obligations. APL suggests strongly that efficiencies and cost savings gained should be passed on to industry via reduced application fees.

APL would be happy to discuss any of the comments provided in this submission. If you require further information or have any questions, please contact Grantley Butterfield, Policy Manager – Planning & Environment on [REDACTED] or [REDACTED].

Yours sincerely



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