

16/12/2022

Attention: Expert Panel
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Adelaide SA 5001

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The Eyre Peninsula Local Government Association (EPLGA) is a collaboration which represents the interests of the Eyre Peninsula community. The EPLGA Board has resolved to submit this correspondence to and for consideration of the Planning System Implementation Review.

Within the Eyre Peninsula community there is an intent to improve the timeliness in which Council Community Development matters are progressed. This is particularly evident with referrals that are required as part of the process.

From the perspective of the EPLGA a number of improvements could be explored for progression, firstly with the planning system and secondly alterations to the machinery of government. The aim of these improvements is to reduce a level of red tape and to increase engagement efficiency in particular with the raft of environmental departments that sit within the State Government.

Improve involvement in the creation of Regional Plans

Whilst a number of larger councils within South Australia have the resources (staffing, funding etc) to significantly input into the creation and updates of Regional Plans; numerous smaller councils find it difficult to input at the same level. This then creates difficulty for these smaller councils to forecast and apply long term strategic planning within their councils and more specifically their townships. This in turn reduces the opportunity for smaller councils to expand and grow. These councils often have 'unwritten' plans and strategic directions for their townships; however, no avenue exists for these concepts to be realised due to the inability to properly resource investigations which ultimately result in the Code Amendments necessary to effect policy changes.

It is therefore proposed that the SA Government provide appropriate resourcing to councils that are unable to fund their own strategic planning for input into the regional plans. This resourcing would transform these initial plans to real strategic directions. This would provide the potential for identification and progression of code amendments within these councils and townships.

A Regional Planning template for progression and informational series could be produced in the first instance to provide assist to Council's to interface with the early stages of the process. Following this a potential opt-in step-by-step case managed strategic planning process could be administered by Team PLUS within the SA Government. This process would provide a dedicated resource to give advice and guidance on strategic planning, effectively acting as an advocate for Council and also

provide a central conduit for communication with other relevant departments for the strategic planning process.

Ultimately this process would bolster Councils ability to strategically plan their council areas, which in turn flows through to a more efficient code amendment process and then development assessment process.

Formalise areas for Growth within townships

Part of this strategic analysis should provide an updated suite of township boundaries in consultation with Councils and the LGA. As a historical reference, the Government Township layer within SAPPA is available however has not been updated to provide the current and real boundary of townships for the majority of South Australia as each township has grown over time. This update must be undertaken to establish the current boundary of townships. This is critical to strategic planning and master planning of townships moving into the future.

This update would be in accordance with the definition of 'township' under Chapter 1 Section 4 of the Local Government Act 1999 provides that a township means—

- (a) *any government township and any land laid out as a township where plans of the township have been deposited in the Lands Titles Registration Office, the General Registry Office or the Surveyor-General's Office; or*
- (b) *any part of the area of a council that contains at least 20 residences and that is defined as a township by the council by notice in the Gazette;*

Essentially this review would require gazettal of new township boundaries for each current township within South Australia.

The establishment of these township boundaries then provide a benchmark for Councils to forecast growth. This boundary also enables the opportunity to exclude the requirement for additional potentially unnecessary assessment for new development within townships.

As an example, the Native Vegetation Overlay could be excluded within townships. The native Vegetation Overlay within SAPPA applies to the majority of the State. As per Schedule 9, clause 3, item 11, a referral (with direction) is required for:

Development that is—

- (a) *within the Native Vegetation Overlay or the State Significant Native Vegetation Overlay under the Planning and Design Code; and*
- (b) *is specified by the Planning and Design Code as development of a class to which this item applies.*

In relation to (b) the Planning and Design Code specifies that a referral is required for development that is the subject of a report prepared in accordance with Regulation 18(2)(a) of the Native Vegetation Regulations 2017 that categorises the clearance, or potential clearance, as 'Level 3 clearance' or 'Level 4 clearance'.

The removal of this requirement within townships would provide a red tape reduction for areas in which growth within South Australia is specifically anticipated. There should be a right to develop within township boundaries, as generally the zones within townships promote development activity. To require a native vegetation assessment within a township is therefore at odds with the general intent of zoning and development.

This mirrors largely the Character Preservation District and Environmental Food Protection Area and is a sensible approach to balance the progression of economic development within established townships and the retention of productive land outside of established townships.

Examples of townships vs SAPPA Government Township Layer:



Expansion of Liaison Officers within SA Government

Whilst the Department for Environment and Water has created a coordinator role to provide proponents a central contact within DEW, it would be advantageous for this role to be expanded to coordinate all environmental departments that are required to be engaged for Council Community Development. This role would be a conduit across all environment departments and be able to create a central hub for the progression of environmental matters within the State Government.

The role(s) seek to increase the efficiency of communication between Council and environment departments with the aim of fast-tracking council community development that requires environmental assessment.

For example, a project may require native vegetation clearance from the Native Vegetation council, an assessment of the Heritage impacts from the State Heritage Branch and an assessment on the impact upon coastal processes from the Coast Protection Board. A council projects liaison officer can be the conduit between the separate bodies and the council to increase the communication and consolidation of materials between these entities and provide a single point of contact for these projects.

Summary

The EPLGA requests that the current review consider this submission and we would be pleased to provide further information into the review process in respect of this matter.

Thank you for your consideration and we would be pleased to provide further information and input as you may require.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P Scott', written on a light-colored rectangular background.

Peter Scott
Executive Officer