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## Draft State Planning Policies for South Australia

The Horticulture Coalition of SA represents South Australia's \$3 billion horticulture industry, worth about \$1 billion at the farmgate.

The Horticulture Coalition's members include:

- Almond Board of Australia
- Apple and Pear Growers Association of SA
- Australian Mushroom Growers Association
- AUSVEG SA
- Citrus Australia - SA Region
- Hortex Alliance
- Nursery and Garden Industry of SA
- Olives SA
- Onions Australia
- Pistachio Growers' Association
- South Australian Chamber of Fruit and Vegetable Industries
- SA Produce Market
- Summerfruit SA
- Women in Horticulture

It is critical for the horticulture sector to be engaged early and genuinely in the development of planning policy, including Regional Plans and the Planning and Design Code. The sector clearly has a key interest in policies relating to **Environment and Food Production Areas**, along with any **urban growth boundaries and policies**. This is particularly the case due to the prevalence of horticulture in peri-urban areas.

The need to maintain primary production land – using smart and sophisticated instruments/policies – and to undertake strategic planning is supported. However, concerns have also been expressed within the industry about blunt policy instruments associated with urban growth boundaries. These concerns relate to the diminished power of local communities and landholders to influence these planning policies, impacts on land values and the flexibility for growers to subdivide or sell land in the future.

A submission by AUSVEG SA and the SA Produce Market, relating especially to the Northern Adelaide Plains region, is attached for careful consideration (Appendix 1). This highlights some of the complexities to be considered and some of the risks associated with blunt policy instruments.

The Principles of Good Planning (Urban renewal principles, dot point 2) and State Planning Policy 1 both refer to the protection of significant rural or food protection areas from urban growth. This is an important consideration, but planning requirements for primary production areas are also much more complex than that. For example, for higher intensity primary production in particular (including horticulture), the block sizes required can be significantly smaller<sup>1</sup> and labour requirements (and the accompanying needs for nearby housing) are higher. Vertical integration and strong linkages between primary production and packing or processing need to be taken into account; as well as growth opportunities in areas such as farmgate sales.

Most planners would be aware of the close interactions between generational succession and the planning system. The ability for older generations of primary producers to support their retirement is commonly a critical element in the ongoing success of the business for the next generations.

In addition, land use conflict is not limited to urban encroachment (i.e. rural-urban conflict) and there is a need to manage issues such as mining and gas activities<sup>2</sup>, conflict between rural land uses (e.g. due to chemical use regimes and the need to manage spray drift issues) and between rural land uses and other land uses.

While acknowledging point 5 under State Planning Policy 1, this is an area which needs to be carefully managed, with early and extensive engagement with industry. For example, the interaction between points 2 and 5 (and other references to the protection of primary production land from urban encroachment) – and the need to avoid blunt policy instruments – must be carefully considered and the policies must be carefully worded.

This is covered better in State Planning Policy 8 (pages 42-43). However members have raised concerns about the balance likely to be achieved between primary production and other land use types, following point 4 under State Planning Policy 8, and the ability to successfully continue farming in peri-urban areas, for example. Lack of industry knowledge and experience within planning bodies, from the state level through to the local level, can result in impractical and/or unreasonable requirements (e.g. recent issues needing to be addressed by industry representatives relating to fire protection requirements and concerns about spray drift from covered horticulture).

We note the reference on page 4 to a new **Spatial Atlas** currently in development. This Spatial Atlas and the “spatially referenced Zones, Sub-Zones and Overlays” mentioned on page 8 are of great interest to the horticultural sector (along with Regional Plans and the Planning and Design Code) – and should be the subject of careful consultation with industry.

Presumably references to consideration of “patterns of growth” (e.g. page 23) will also take into account industry growth and non-urban growth and development. Other industry patterns may be relevant to strategic planning and planning decisions. For example: the seasonal nature of industry activities and employment (and related accommodation needs) is significant; projected growth and other industry trends can be important; and the value of freight being transported may be a relevant consideration (not just the volume of freight or number of vehicles).

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<sup>1</sup> The generalisations associated with the “Rural Areas” category on page 21 are thus queried. This seems to suggest that primary industries and markets are associated with very low population density. In reality primary industries are probably linked with what might be referred to as “lower to very low density” population areas.

<sup>2</sup> The Statement of Principles on Mining and Gas by Primary Producers SA (PPSA) recommends that “[I]and use planning decisions should be made by the relevant planning authorities” and “[m]ining and gas activities which do not comply with development plans should not be exempt from planning approval requirements”. Other submissions by PPSA have also queried the legislative framework in which the Minister for Mineral Resources and Energy is the key decision-maker for mining and gas proposals, rather than the relevant planning authority, despite the fact that important land use and planning decisions are being made.

## **High quality design**

Good design (as per the Principles of Good Planning and State Planning Policy 2) is important not only in urban areas; and rural and industry outcomes need to be considered (not just urban form outcomes as per page 25). However, in the industry context, good design needs to occur within the constraints of cost and the need to be cost-competitive (locally, nationally and internationally). Ideally, good design could assist industry to be more efficient and/or manage costs, with function/functionality (e.g. encompassing industry's infrastructure requirements) a key consideration.

The imperative to keep costs at reasonable levels for industry should be recognised as a strong driver throughout all planning policy – including the Planning and Design Code, in particular, and Regional Plans.

The principle (page 15) that “Planning and design should be undertaken with a view to strengthening the economic prosperity of the state and facilitating proposals that foster employment growth” is supported.

## **Targets**

Could targets be added for the “productive economy” and for infrastructure (e.g. including freight transport infrastructure)? (page 16)

## **Housing supply and diversity**

Page 37 acknowledges the need to identify land for housing development and redevelopment in areas accessible and well connected to employment; taking into account “the projected workforce population, including housing that may be required for non-residents working in large-scale mining, agricultural, industrial or infrastructure projects”. Regional housing needs for employees (including seasonal employees) – and including smaller to medium scale businesses – are an important consideration. These regional needs linked to employment could perhaps be better reflected also on page 36.

## **Primary industry**

Page 42 provides the example of fisheries, aquaculture and forestry industries “hav[ing] their own particular requirements”. This could be said of all primary industries!

Point 3 under State Planning Policy 10 (page 46) – “Identify and maintain strategic transport corridors and other key infrastructure required to support...activities [of the sector] and their supply chains” – should be added also to State Planning Policy 8 for primary industry.

## **Employment lands**

Can these be more clearly defined? (e.g. in the Glossary and on pages 44-45) For example, would packing facilities and other horticultural processing facilities be included?

## **Key resources**

While State Planning Policy 10 mentions the need to “minimise the potential for land use conflicts between incompatible uses”, this section underplays responsibilities to make appropriate decisions about mining and gas projects (for example, taking into account the short term nature of mining and gas projects versus other longer term industries) and to protect resources such as water and land resources for other critical uses, such as food production. *See also footnote 2.*

## **Strategic transport infrastructure**

“South Australia also relies on our efficient and reliable aviation sector and sea ports” should probably be amended to “*an* efficient and reliable aviation sector and sea ports” as the cost efficiency of our sea ports, in particular, could be queried. The aviation sector and sea ports are also critical to primary industry (paragraph 5 on page 50).

## **Water security and quality**

“Prioritise the protection of water supply catchments including...” (page 60) might be better worded: “Prioritise the *management* of water supply catchments including...” to reflect the significant levels of use of many of the water resources listed, for many and varied purposes.

On page 60, the wording of the second and third sentences under “Regional Plans” is not clear. Perhaps this should be: “Catchments should be identified on maps in Regional Plans to assist with assessments of upstream and downstream impacts of proposed developments. Water Protection Areas should be mapped.”?

## **Natural Hazards**

“Development will not be permitted or will need to meet specific design standards in areas that are high risk or vulnerable locations” (page 62) seems excessively prescriptive. (Much of the state is prone to natural hazards, such as bushfires, high winds etc. Presumably this won’t stop new developments such as new sheds.) “Certain types of development may be prohibited or required to meet specific design standards in areas that are high risk or vulnerable locations” would be more acceptable wording.

“[Developments] must also not result in ongoing cost burdens associated with their protection...” should specify that “[Developments] should not result in ongoing *public* cost burdens...” as surely it is up to a private landholder what level of cost burden they are willing to assume.

## **Strategic state-level approaches vs local knowledge and interests**

It is noted that there is no requirement for industry knowledge (let alone knowledge or understanding of primary industry), nor knowledge of rural or regional issues, within the State Planning Commission. This again highlights the vital importance of engaging industry early and extensively in the ongoing development of policies which will impact primary producers – particularly Regional Plans, the Planning and Design Code and any new State Planning Policies.

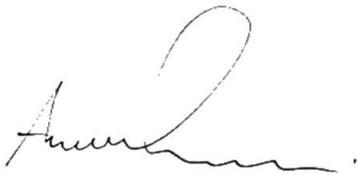
On page 9, there is a reference to assessments requiring expertise available at the state level. While the need to utilise this capacity (where it exists) is acknowledged, this should not come at the expense of the recognition of local knowledge which may also be valuable in setting appropriate policies and making appropriate decisions.

State Planning Policy 4 on **Biodiversity** is another area where local knowledge – including local landholder knowledge – and engagement will be critical (especially if areas of high conservation value are on private land or if protection of biodiversity values requires any changes to private land use and/or practices).

We look forward to a close involvement in the development of the Planning and Design Code and further and future policy development.

To coordinate further discussions, please contact Amy Williams on [REDACTED] or [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read 'Angelo Demasi', with a large, stylized initial 'A'.

Angelo Demasi  
President  
Horticulture Coalition of South Australia

[REDACTED]  
[REDACTED]

## APPENDIX 1



### **Re: AUSVEG SA and South Australian Produce Market comments regarding new planning regulations announced in the Advertiser on Wednesday 2 December 2015**

To whom it may concern

The following paper contains commentary on the new proposed planning regulations outlined in the Advertiser article "Battlelines drawn over future urban growth" on Wednesday 2 December 2015.

The article proposed a number of new zoning changes to manage development and protect productive agricultural land. AUSVEG SA and the South Australian Produce Market (SAPM) have a number of suggested changes to these new regulations in relation to the Northern Adelaide Plains region to more effectively plan for future growth.

At present the industry on the Northern Adelaide Plains faces a number of water and land constraints preventing its expansion. We feel that with the following proposed amendments that the South Australian Government will be able to better facilitate the growth of horticulture and employment in the Northern Adelaide Plains region.

## Proposed amendments to zoning changes

Please note that area lines are approximate only.



### 1. Area allowed to be redeveloped and not kept aside for green zone.

AUSVEG SA and the SAPM feel that the area south of the Gawler River will eventually likely need to be used for infill of housing or industrial zones. This land usage can also potentially be used as a method for encouraging investment in and consolidation of horticultural production allowing for expansion of the South Australian industry. Note that many growers on the Northern Adelaide plains are significantly smaller than other states like Victoria due to a lack of investment. The Mornington Peninsula region of Victoria provides a model of how investment through residential and industrial development has assisted in growing horticultural production. Note that care would need to be given to accommodate the needs of existing pack houses operating in the area to ensure they would be able to maintain operation through a transition and that industrial areas to support production further to the north be located around existing businesses to allow for their continued operation.

### 2. Expansion of the current rural living zone further west, east and south to the river

Expansion of the current rural living zone could be considered to provide a future labour source for the proposed green zone.

### 3. Zoning for hydroponic and pockets of light industrial heading north and to the west of Port Wakefield Road to Wild Horse Plains running parallel to the coast

This area should be marked for hydroponic development due to high salinity in the subsoil. Pockets of light industrial zoning should also be considered in this area (agricultural reseller warehouses etc.) to provide support to the nearby horticultural industries in the green zone. As the green zone develops further north this area can also be considered for residential development to provide a labour source for horticultural businesses further north.

### 4. Development of the green zone further north

The green zone can be developed further north of the other areas, provided water and infrastructure can be progressively provided to support horticulture's expansion into new areas. Existing soil mapping research has shown suitable soils suitable for horticultural production in the Light and Mallala Council areas which should be considered to support the future expansion of horticulture.

*Some points to consider in development of the green zone*

- The South Australian Government could consider establishing a stormwater collection point for the entire Metropolitan Region of Adelaide to allow this to be used in the green zone. This could potentially be achieved by moving the Bolivar sewerage treatment works north of the Gawler River and converting the current treatment plant into a stormwater collection point for use in existing and new pipeline infrastructure.
- It is expected that underground water currently used in growing areas will become unused as production expands further north. These resources will need to be tapped and directed north under a buyback or other scheme.
- The current developments in seawater desalination using solar power being used at Sundrop farms could be investigated for use with farms in the proposed hydroponic production zone. In addition, opportunities to scale up this technology for commercial-scale use could be investigated to provide supplementary water to the hydroponic production and broader green zone horticultural area.

## **Other constraints to consider to allow for growth of the green zone**

- Transport, power and communications infrastructure

Horticultural businesses will require sufficient access to transport, electricity and communications infrastructure if they are to move their businesses further north. This is in addition to adequate access to land, water and a labour force detailed in the points above.

Infrastructure will need to be gradually rolled out as new production areas are opened up for production.

- Issues of competitiveness with other states

South Australian horticultural business, have in the past, and will continue to look interstate to expand their production. Other states and territories such as Western Australia and Victoria have been attractive to local growers due to the availability of water, land and a willingness from governments to cut red tape. As such, South Australia faces the very real risk of losing jobs and business to other states.

In particular, it remains difficult for growers to achieve approvals from a number of government departments and councils in South Australia which is impeding investment. Payroll tax also needs to be reviewed as horticulture is a labour intensive industry and this remains a significant disincentive to increasing employment and business expansion. Another concern is power costs in South Australia, which are currently double those paid in other states.

With South Australia competing with other states in domestic and export markets it is essential that our growers have access to water at the most competitive price. As such, the Horticulture Coalition proposes that any investments in water infrastructure should be open to all bidders and that water pricing and availability is the main considerations in selecting a successful tender. The future competitiveness of our significant \$1 billion industry is stake as are thousands of jobs in Adelaide's North.

## **Conclusion**

AUSVEG SA and SAPM hope the South Australian Government will consider the above points to further develop and fine tune the proposed planning regulations proposed in the Advertiser and in the development of the green zone. Addressing the issues outlined in this paper will be critical if the green zone is to be successful and the South Australian horticulture industry is able to compete with other states in domestic and export markets.

As we speak, other states such as Tasmania, Western Australia and Queensland are opening up new land and water resources for horticultural development. If South Australia does not act, our growers will not be able to compete and potentially lose vital economic output and jobs in Adelaide's North. On the upside, however, if the South Australian Government addresses the issues outlined in this paper, our industry will be well placed to increase its productive capacity and jobs well into the future.