



The Flinders Ranges Council

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REF: GDS 3.71.7.4 – 2019-077ACEO

Wednesday, 27th November 2019

Mr Michael Lennon
Chairperson
State Planning Commission
Department of Planning, Transport & Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Email: DPTI.PlanningReformSubmissions@sa.gov.au.

Dear Michael

RE: PLANNING & DESIGN CODE – THE FLINDERS RANGES COUNCIL SUBMISSION

Council thanks the Commission for the opportunity to provide a formal submission on the Planning and Design Code (the Code).

The Flinders Ranges Council's submission focusses on three (3) matters, being:

1. That the areas in the township of Quorn (being those areas in Township Fringe Policy Area 1 of the Primary Production Zone) be transitioned into a Rural Living Zone in the Code;
2. That stronger controls on Wind Farms be incorporated in the Code to prevent Wind Farms in the area currently zoned Rural Landscape Protection Zone of the Development Plan; and
3. Minor miscellaneous changes.

Council's reasons for these three (3) matters are outlined in more detail under the following headings.

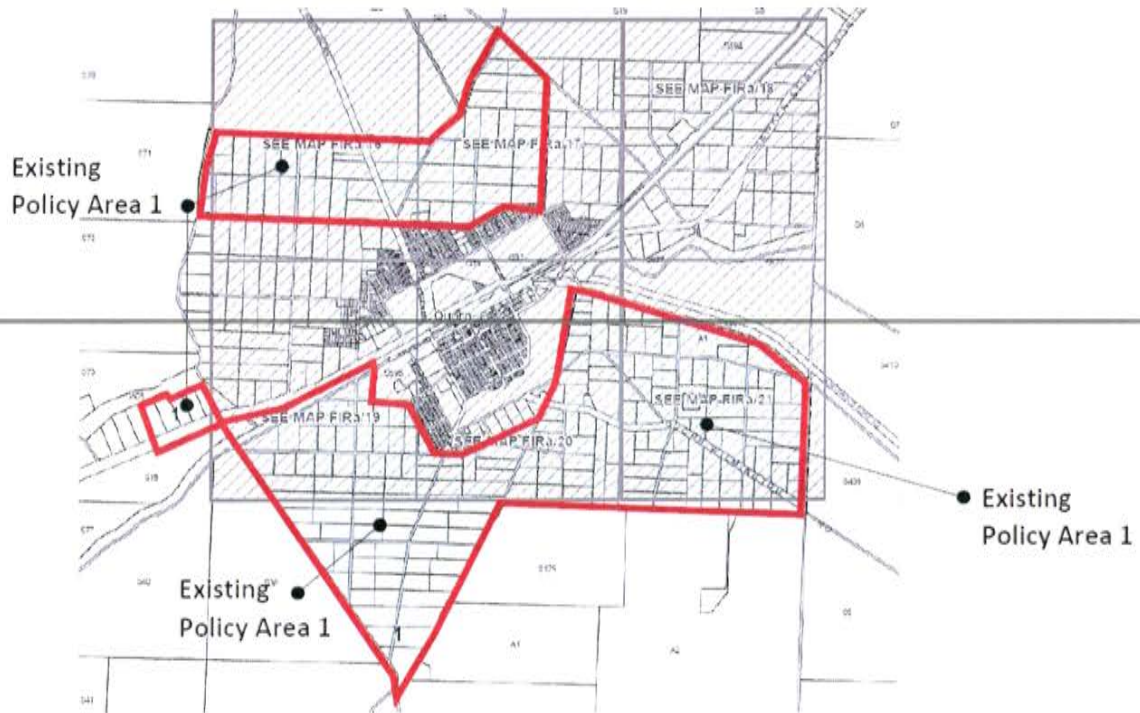
1. Quorn Township - Township Fringe Policy Area 1

It is Council's position that the areas on the periphery of the township of Quorn (being those areas in Township Fringe Policy Area 1 of the Primary Production Zone) be transitioned into a Rural Living Zone in the Code - these areas are illustrated in the following graphics.

The current Township Fringe Policy Area 1 has somewhat similar zoning and policy characteristics to the Rural Living Zone. That is the Policy Area specifically recognises detached dwellings as an envisaged form of development, which is further reinforced by a merit pathway for detached dwellings given the old established survey/allotment pattern in the area. In respect of seeking to curtail development over and above those lots that already exist, the Policy Area seeks to prevent the establishment of additional lots in the area.

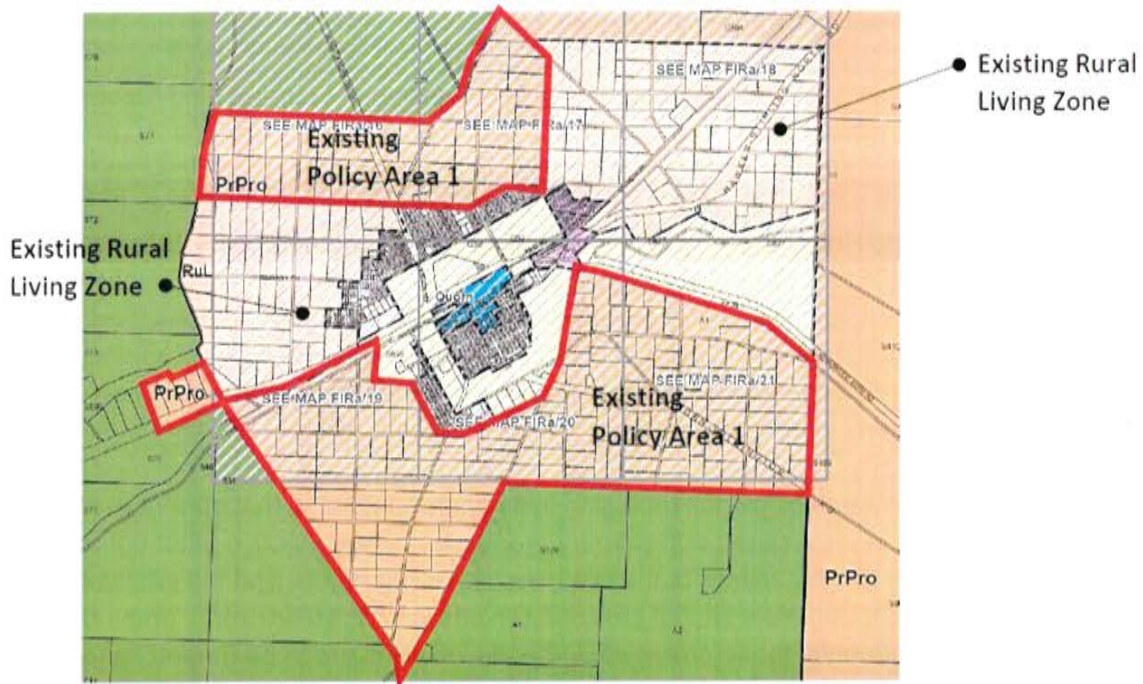
Where the Policy Area becomes somewhat confusing in its interpretation, is that current guiding policy seeks that dwellings be associated with primary production □ that policy is often not applicable in the context of the already divided nature of the area, its rural living nature and the practical inability to farm land on existing lots that have a typical size of 3-6 hectares. There are some areas that are farmed over a series of allotments, these areas would be able to continue to be farmed based on use rights of the land.

All Correspondence to be addressed to the Chief Executive Officer



Dwellings are already being established within these areas □ the areas are serviced by a network of local roads and surveyed roads, and are of a large size to provide scope for good built site design and wastewater design options (at a built form development application and assessment stage). Council also feels that a more sensible and practical approach to zoning of the land will help avert the current trend of people placing shipping containers on land for various purposes.

In further support of Council’s submission, the areas adjoining Policy Area 1 are already zoned Rural Living (as illustrated below), having the same town survey allotment pattern and site characteristics.



The current zoning is confusing to interpret and does not reflect the direction of Council that is currently supporting use of these areas for detached dwellings and hobby farming - the lack of clear policy direction is also causing somewhat of a disincentive to attracting investment into Quorn.

The position of Council is further reinforced by reference to the Strategic Directions Report, Flinders Ranges Council 2014, which recognises Quorn offers a rural living experience with the convenient services and community facilities. The Report also acknowledges that rural living areas surrounding Quorn are substantially developed, that Council has identified demand for an expansion of rural living opportunities in Quorn, that people move to the area seeking a “tree-change” lifestyle, particularly in retirement, and that Quorn is only 30 minutes’ drive from Port Augusta and there is existing demand for rural living in Quorn from people who work in Port Augusta.

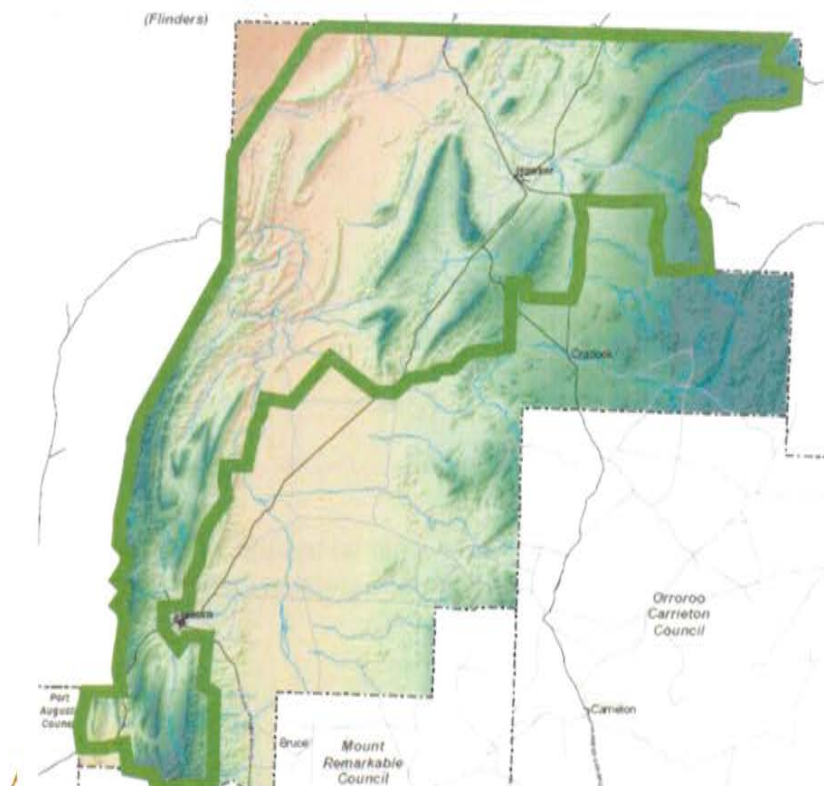
It is Council’s submission that Policy Area 1 of the current Development Plan be placed into the Rural Living Zone of the Code, so as to enable the ability for detached dwellings on existing rural living lots but with restrictions on being able to create additional allotments in the area.

2. Rural Landscape Protection Zone

Context of current Development Plan

Council seeks that strong controls over Wind Farms be incorporated into the Code to prevent Wind Farms in the area currently zoned Rural Landscape Protection Zone of the Development Plan.

As illustrated in green below, the Rural Landscape Protection Zone has very wide application in the Council area by virtue of vast landscape areas comprising the Flinders Ranges itself – the Flinders Ranges being one of the world’s most iconic and oldest geological and landscape formations of its type and one of South Australia’s unique tourist attractions.



The zone specifically recognises the importance of the Flinders Ranges with some of the most prominent ranges in the region, the high scenic value and natural beauty, containing many features of outstanding natural beauty and environmental importance, with parts being of scientific interest.

The zone also recognises the architectural, historical, geological, cultural (including Aboriginal) and scientific interest of the region.

The zone places a strict conservation policy approach for the protection of the significant elements of the Flinders Ranges.

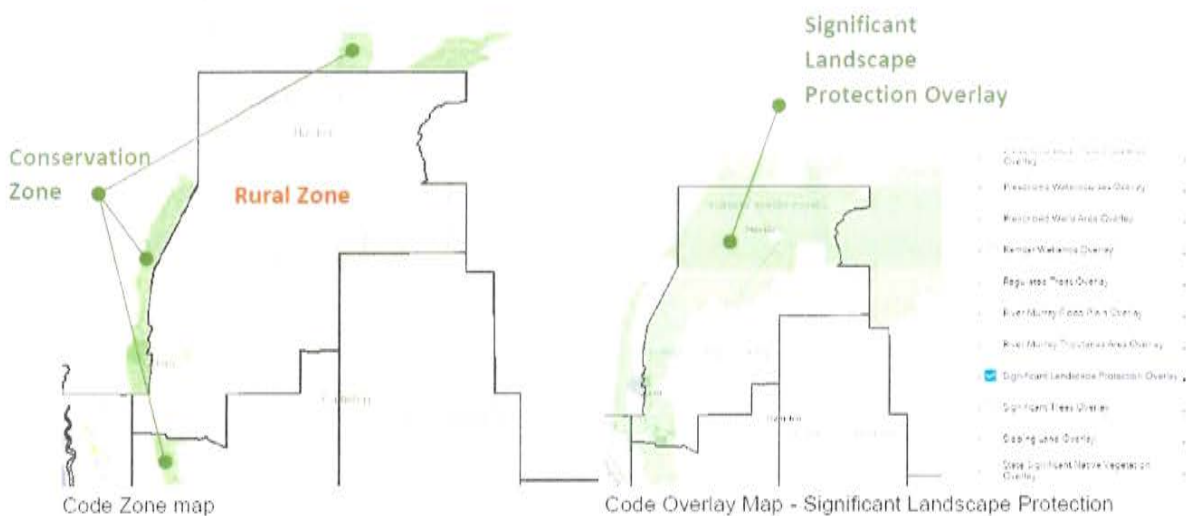
In relation to Wind Farms, the current Rural Landscape Protection Zone of the Development Plan is quiet on the matter of Wind Farms being developed – noting, that notwithstanding the clear conservation message espoused in the Desired Character Statement for the zone, the zone provisions provide no specific deterrent to wind farms nor are wind farms listed as a non-complying form of development in the Rural Landscape Protection Zone of the Development Plan.

By comparison, the Primary Production Zone of the Development Plan provides clear direction with wind farms being an envisaged form of development, subject to meeting a whole of Development Plan assessment.

The Code

The Code places the current Rural Landscape Protection Zone of the Development Plan into:

- The Rural Zone – shown in **brown** in the figure on left (source Code map viewer)
- An overarching Significant Landscape Protection Overlay - shown in green in figure on right (source Code map viewer)



Council notes that in the Rural Zone, a wind farm would be treated as a Restricted form of development in the area of the Significant Landscape Protection Overlay – Council supports that approach.

Council also notes that the policy within the Significant Landscape Protection Overlay states that renewable energy facilities are not to be undertaken, as shown below in the screen shot extract from that Overlay – Council supports this approach, so long as planning authorities abide by this.

PO 1.2

Development in the form of the following not undertaken:

- (a) renewable energy facilities;
- (b) large scale industry, storage, distribution, warehousing; and
- (c) intensive animal husbandry.

However, Council does raise concern with some other parts of the Flinders Ranges (outside of the Flinders Ranges Council) that are within a Conservation Zone in relation to how the policy in that zone is drafted. That is, in the Conservation Zone, Renewable Energy Facilities are to be Performance Assessed, they are an envisaged form of development and as illustrated in the graphic on Page 4 of this submission, the Significant Landscape Protection Overlay does not apply.

Council would doubt the Commission intended to envisage potential for wind farms in the Conservation Zone – this is an issue Council raises for your attention especially given the tracts of Conservation Zone on our western, southern and northern boundaries in those adjoining Council (and out of Council) areas.

The position of Council on wind farms is reinforced in the Strategic Directions Report, Flinders Ranges Council 2014, which considered that the Statewide Wind Farm DPA 2012 did not appropriately address the concerns raised by Council relating to the potential for proliferation of wind farm development and the adverse impact on the scenic beauty of the region.

3. Minor Miscellaneous Changes

As a result of prior discussion with Council's Transition Manager at the Department of Planning, Transport and Infrastructure, Council understands that the following miscellaneous changes will be made to the Code. Council wishes to reaffirm its support for these changes.

Quorn

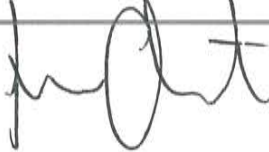
- The Community Wastewater Management System facility be changed to Infrastructure Zone.
- The cemetery to be changed to Community Facilities Zone.
- The airfield to be changed to Infrastructure (Airfield) Zone.
- The Township Activity Centre to be changed to Township Main Street Zone.

Hawker

- The airfield to be changed to Infrastructure (Airfield) Zone.
- The caravan park to be changed to Caravan and Tourist Park Zone.
- The Township Activity Centre to be changed to Township Main Street Zone.

Council once again thanks the Commission for the opportunity to make this submission on the Planning and Design Code, and it respectfully seeks your formal response.

Yours sincerely



SEAN R CHERITON B.Ec. CPA JP FGLF
ACTING CHIEF EXECUTIVE OFFICER

SC:SC