RE: PRODUCTIVE ECONOMY POLICY DISCUSSION PAPER

Thank you for providing the opportunity to provide feedback on the Productive Economy Paper.

Overarching Comments

A title to reflect the South Australian Government commitment to sustainable development, would read SUSTAINABLE DEVELOPMENT – ECONOMIC DIRECTIONS DISCUSSION PAPER. This would then facilitate stronger linkages and integration with the social and environmental aspects of planning that have been covered in other planning discussion papers.

Overall, there is minimal tangible evidence that the planning framework will protect and enhance environmental assets, biodiversity and ecosystems when it comes to economic development. The commitment described in this paper are vague and superficial. For example, when it comes to the energy and resources sector, the document makes brief mention that:

“the Code in particular, must adapt to increasing exploration and production in the energy and resources industries, while also being mindful of environmental concerns. Policies in the Code must consider interactions with other regulatory levers, such as environmental impact statements”.

The code should ensure commitment and assurance that the planning framework will drive better outcomes. Much of the content of Environmental Impact Statements contain little more than documentation of the development with a few comments on mitigation and efficiency that would have occurred anyway and very few strong commitments for sustainability.

For example, when it comes to the greenhouse impacts of projects the end result is typically nothing more than reporting of GHG emissions to the Federal Government as already required under the NGER Framework for large energy users, but no site reporting to the community. Even with really big projects such as the Adelaide Desalination Plant where the Governor’s approval of the project was conditional on the plant being carbon neutral for construction and operations, there was no compliance penalty established and the commitment has never been properly implemented.
Land management and site rehabilitation are other areas where there is little confidence in the planning framework, EIS processes and other regulatory mechanisms to assure adequate outcomes.

It is agreed that “South Australia’s new planning system must feature policy which encourages new investment, industry diversification opportunities and job creation while protecting our lifestyles and environment”, and this must also extend to all aspects and all themes of economic policy.

**Key issues to acknowledge in the What We Have Heard Document**

*“Develop on Clear Land” Principle*

It is requested that the Planning Commission acknowledge the recommendation for a *Develop on Clear Land Principle*. This principle should underpin the direction of the State Planning Framework to support economic growth in a way that does not continue the destruction of native vegetation and natural assets as incidental to planning approvals. Poorly located infrastructure, broad scale native vegetation clearance for solar farms and tourism developments located in parks and native vegetation highlight planning areas where urgent reform is required.

**Ports in Spencer Gulf**

It is not appropriate to have continuous industrial port and port expansion proposals in Spencer Gulf and Upper Spencer Gulf. The more shipping and port activity that takes place higher in the Gulf, the more likelihood there is for diffuse harm, incident harm, seagrass harm and whale strikes as the gulf narrows in the north, particularly above Whyalla. There have been studies to show that an additional port located further south such as the Cape Hardy proposal, would be better than upper gulf expansions and port additions. Just as we should not have over development and poorly placed development on land, we should not be supporting over development and poorly placed industrial ports in South Australia’s coastline. A strategic long term plan is required.

**THEME 1 - SUPPORTING AND GROWING KEY INDUSTRIES**

**Sub Theme 1 Primary Industries**

*Re: “Planning policy needs to conserve natural environments, biodiversity and agricultural lands to ensure continued productivity”.*

Agreed. Clearly defined mechanisms are required to achieve this outcome, including the mechanisms to support and restore statewide biodiversity corridors and to reconnect parks and remnant native vegetation blocks that have been islanded by agriculture and land clearance.
Sub theme 1.2 – Tourism

Tourism and accommodation facilities are supported but large accommodation facilities should not be placed in the state’s conservation parks causing harm, native vegetation clearance, new energy and water infrastructure, new and upgraded access roads, new asset protection and bushfire buffer zones causing yet more harm to native vegetation around tourism facilities and along roads etc, etc, etc.

The People and Parks Strategy prepared by and agreed, through extensive consultation, provides guidance and principles about protecting and enhancing parks and includes a commitment for low impact developments:

“The Department of Environment, Water and Natural Resources (DEWNR) has developed People and Parks to enhance parks and the experiences they provide to people. It has been developed in consultation with other agencies, Aboriginal partners, the tourism and recreation sectors, local government, education providers, community organisations, volunteer groups and conservation groups”.

“Strategy 3 – Make sure that recreation and tourism is sustainable”

Rationale & Priorities Action Partners

Strategy 3 contributes to:

- Goal 1 (Enriching our lives) by ensuring that parks are conserved for the benefit of future generations;
- Goal 2 (Enhancing parks) by promoting responsible use and ensuring that any development enhances parks;
- Goal 3 (Shared stewardship for parks) by encouraging partners to help care

Recently however, the concepts and commitments agreed through the People and Parks Strategy appear to have been abandoned. We now see that the Department of Environment and Water has become an economic development agency, replacing commitments to environmental protection and sustainability with “balancing environmental protection and economic development”. In plain English this means that the environment can be compromised for tourism development in parks causing harm, rather than ensuring appropriate tourism facilities are located in the right places for coexistence of both the environment and tourism.

The types of tourism development being proposed on Kangaroo Island (Flinders Chase and the KI Links Golf course near Prospect Hill) and potentially for the Cleland Wildlife Park have not been consistent with the People and Parks Strategy. Proposals are also not consistent with the sustainability of the parks, ecosystems protection of native vegetation and protecting future tourism.
Tourism facilities created in the wrong places even decades ago are still causing additional native vegetation clearance, asset and bushfire buffer zones and prescription burning to protect assets. These impacts were never properly defined in original project scopes and development approval processes.

There is also a risk that tourism development projects that are marginal, will ultimately continue as something else, such as a residential settlements. This should not happen in places that should be returned to natural conditions, rehabilitated and re-wilded. For example, the KI Links Golf Course project should never become a residential settlement as it is not a suitable place for a town or village. If the golf course fails, the site should be returned to a natural state.

RECOMMENDATIONS

- Developments should be located on land that is already cleared and can be safe from natural hazards. As a principle, tourism developments should be located in safer previously cleared land which already has adequate asset protection and bushfire buffer opportunities. The construction activities at these clear site locations can then establish the appropriate landscaping and outdoor environmental amenity to support the character of the development.
- The State Planning regulations should incorporate the policies and principles already agreed in the People and Parks Strategy to ensure that developments in state parks do not cause harm to the natural assets of the parks, either directly through primary clearance or as secondary clearance as make safe impacts.
- Major Tourism facilities such as golf courses in natural landscapes and scenery should be approved for that purpose only. If they prove to be unfinancial, the planning system should ensure that sites are rehabilitated and returned to natural form rather than becoming badly placed residential settlements.

Sub theme 1.3– Mining and exploration

The Discussion Paper states that:

“the Code in particular, must adapt to increasing exploration and production in the energy and resources industries, while also being mindful of environmental concerns. Policies in the Code must consider interactions with other regulatory levers, such as environmental impact statements”

**Question:** How is South Australia going to achieve zero GHG emissions by 2050 if there is a competing objective to continue growing petroleum energy developments for decades to come? This contradiction needs to be reconciled or the State Government should clarify that it is not committed to the zero net emissions 2050 policy.

The broader issue for the Planning framework governing the minerals and energy resources sector, is how the Planning Framework will be improved so that it is effective in delivering outcomes. Some particular matters include:
Poor commitment in EIS documents: - EIS documents go to great lengths to describe local environments, provide extensive words about the development and then, masked in a sea of text there are very few real commitments or requirements in the final approvals. For example, the sections on addressing climate change typically provide words but no commitments beyond what is already required under law such as the NGER Reporting framework. They also provide minimal if any public reporting at a site level.

For the Leigh Creek Underground Coal Gasification Trial approval, there was not even a requirement to disclose the greenhouse intensity of converting a kg of coal to a MJ of useable gas.

It seems that those approving developments sometimes accept non-accountable options such as commitments to undertake further feasibility studies, and nothing more.

- When BHPB undertook and EIS for the ODX (2006-2009) they committed to building a heat recovery system to capture up to 250 MW of electricity from waste heat but this (and the expansion) did not proceed. Yet when BHPB replaced their furnace facilities in 2017/18, there was no word on waste heat recovery.

- The BHPB Olympic Dam mine has never been able to improve or be held accountable for the birdlife mortality and their acidic tailings facility. Year after year there is a commitment for nothing more than continued investigations. With a new expansion proposal requiring another EIS, will the Planning Framework require actual commitments for protecting climate, incorporating accredited renewable electricity and reducing bird mortality?

The Highbury quarry in eastern Adelaide is an awful example of near zero land management and weed control for more than a quarter of a century. The site management plan/environmental management plan is not public. Roadways and access tracks are managed with herbicides, creating the ideal conditions for continued aggressive weeds. Across the site, the Gorge road hill slopes are covered in weedy pines that are not managed at all. The Anstey Hill slopes are covered in olives, weedy pines, hawthorn berry, artichokes, blackberry, and pampas grass. This is very disappointing as there is also valuable native vegetation at the site. I do not blame the current site managers who look after the site in caretaker mode with limited budget, and they are taking steps to reduce fire risk. However, I do blame the government planning processes and mining and energy oversight for not ensuring that sites are managed and restored continuously throughout the life cycle of extractive industries.

**Recommendations**

It is not good enough to be just mindful of environmental concerns. The Planning Framework must ensure that environmental commitments are delivered and that good land management is achieved throughout the lifecycle of extractive industries. Linking commitments and outcomes to an operating licence would provide the best solution whereby if commitments are not met, the licence can ultimately be revoked.
The exemptions and special treatment in the planning framework for extractive Industries should be wound back so that all land managers are held to account for environmental management and sustainability practices.

**Sub theme 2.1 – Centres, retail and mixed use activities**
There should be stronger commitments for environmental and sustainability outcomes to be incorporated into all centres of economic activity. There needs to be mechanisms to assure that good design principles are turned into action.

**Sub theme 2.2 – Employment lands (industry, manufacturing and commercial)**
There should be stronger commitments for environmental and sustainability outcomes to be incorporated into employment lands. Edinburgh Parks provides an ideal contemporary example of how employment lands are also destroying remnant environmental assets. Northern Adelaide is often regarded as quite sparse, but there are wonderful creeks, ephemeral wetlands, remnant woodland and significant trees across the area. These are steadily being obliterated as incidental clearance to development as the area is redeveloped to be an economic growth and industrial area. It doesn’t need to be this way as there is enough cleared land to achieve all sustainability, environmental protection and economic development outcomes, but the planning framework seems to encourage 1) Achieving a level site 2) placing the biggest shed or factory over as much of the site as possible and 3) disregarding natural assets on anything that is left.

**Sub theme 3.1 – Renewable energy**
The Renewable Energy sub theme must address how a transition to renewable electricity is achieved, and it must not continue to result in massive clearance of native vegetation because of bad planning.

I have just sent in my submission on the native vegetation clearance for the Cultana solar farm which is proposed to cause the clearance of 1,100 hectares of native mallee/woodland and chenopod shrubland. This is four times larger than area of Glenthorn Farm recently protected with significant government fanfare. 1,100 hectares is around the same size as Adelaide, North Adelaide and all the parklands. It is about the same size as the entire Cleland Wildlife Park.

Whilst good planning would ensure that such development would be located on already cleared marginal grazing land, the Planning Framework is allowing developments to be dropped across native vegetation close to sub stations and grid connection points.

Worse still is the loophole that a Planning Minister would first approve the development under infrastructure loopholes in the Planning framework and Native Vegetation regulations with approval for the development granted before environmental impacts are considered. This is a failed process!
The Monash Solar farm proposal sought the same type of destruction to save on building a new sub station, but at a smaller scale.

Renewable energy infrastructure is supported but it must not continue to have wildcard status to undermine approval processes where such infrastructure can be properly planned to be in better and already cleared locations.

**RECOMMENDATION**

It is strongly recommended that the renewable energy provisions in the Planning Framework be reformed to incorporate a principle that solar farms be established on previously cleared land and that a state-wide investigation be undertaken to identify suitable sites in proximity to suitable electricity grid and transmission infrastructure.

**Sub theme 3.2 – Adaptive reuse**

Adaptive reuse should apply to trees, gardens and other natural assets and amenity features as much as it applies to built infrastructure. Without such an approach, the planning framework is driving the creation of an ugly state.

**Sub theme 3.3 – Infrastructure**

**Discussion Question: How can we ensure that land use planning is able to accommodate and support the provision of new and innovative infrastructure?**

The answer to this question lies in strategic long term planning in the direction of where we wish to be as a state in 100 to 200 years’ time.

For Ports infrastructure this would involve a long term plan as to where ports infrastructure should be placed and maintained in places like Spencer Gulf, ensuring that we do not destroy the natural assets and value of unique places such as the cuttlefish breeding grounds near Whyalla, the visiting whales, and the slow moving upper Spencer Gulf waters and seagrasses.

For energy infrastructure this involves looking ahead to where a 100% renewables state (with additional export potential) would locate its future solar and wind farms in a way that optimises the opportunities of the transmission grid, utilizes cleared marginal land and protects native vegetation from further harm.

Road and rail infrastructure should also be planned in a way that minimises environmental harm, but sadly the opposite approach was used in designing the Northern Connector, passing through a significant amount of vegetation in the northern section and what should have been wetlands and saltmarsh restoration in the southern sections for migratory shore birds. Instead, it was built in a way that pushed as close to the coast as possible for what appeared to be an intent to maximize housing development land at near sea level. When considering climate change, the need for coastal adaptation and the continued earthquake liquefaction risk, time will tell if the decisions made were prudent.
Economic Sectors and Green Industries Regions

The concept of green industries as an economic sector still has no traction with the South Australian Government. Why?

The creation of Green Industries SA with an overly narrow focus on waste management, recycling and a circular economy appears to have constrained the thinking in Government and its agencies about the broader role that a whole range of green products and services can contribute to a greener low carbon economy in the broad sense. There is a frustration that as the renewable energy, energy storage, energy efficiency low carbon and greener business activities have been playing a major part in rescuing South Australia’s economy, that key Government documents such as the Northern Economic Plan do not acknowledge green industries as either a sector or a sectoral component across all sectors to be recognised and encouraged. It is almost as if the Government (previous and current) is happy to see the benefits but don’t wish to be seen as too green.

South Australian Green Industries Regions

Establishing South Australian Green Industries Regions is a concept based around supporting, recognising and promoting businesses in adapting to direct and indirect climate change impacts and capturing opportunities for further green industry development and attraction.

All regions have products and services or a role that can contribute to creating a greener and low carbon economy and these have been described but are yet to receive any government traction as a concept. Instead, the regions are striving ahead in spite of poor government recognition. For Example:

- Northern Adelaide is becoming the manufacturing, innovation and development centre for South Australia’s renewable electricity, energy storage and electric vehicles
- Upper Spencer Gulf and the mid north are becoming the powerhouse of the renewable energy transition, and leading nationally and globally in demonstrating what can be achieved
- Kangaroo Island should be the region for sustainable tourism if this can be done without ruining the island with inappropriate and poorly placed development.
- The City of Adelaide contributes as a critical customer and end user of green and low carbon products and services,

The concept would involve, statewide programs of activities and promotion of industry achievements, products and services to grow green industries and expand opportunities in local, interstate and overseas markets. Working to principles of sustainable development, the inclusive nature of the program would recognise and support all South Australian businesses in becoming greener, adapting to climate change supporting the transition towards a low carbon economy. The vision is for:

> South Australian businesses prosper as a nationally and globally in contributing to a green and low carbon economic transition

The programs would support South Australia’s green industries to reach their full potential for jobs and economic benefits and to support all businesses in accessing energy and resource
efficiency, renewable energy and low carbon solutions that can reduce costs whilst also supporting a transition to a low carbon economy. Types of business activities that contribute to Green Industries include: horticulture, food processing and value adding, water management, use of recycled water, renewable energy systems and components manufacturing, sustainable buildings, environmental restoration on land and coastal regions, carbon offset creation, eco-tourism, green industry services and any activities that assist business to become greener and resource efficient.

RECOMMENDATION

A broader definition of a Green and Low Carbon Industries Sector and Green Industry Regions be acknowledged and supported as key contributors to South Australia’s economy. This can either be recognized as a stand-alone sector or as a sub sector spanning across all sectors.