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3 August 2018

To whom it may concern,

Re: Submission to South Australian Government Planning Reform consultation

AUSVEG SA is the industry association representing South Australia's \$650 million vegetable industry. Our industry is a key part of the state's \$1 billion horticulture industry and provides employment and economic contribution in regions throughout the state including the Northern Adelaide Plains, Riverland and South East.

Our industry is characterised by increasing consolidation and the need for growers to upscale their businesses as well as the rapid adoption of new technologies such as protected cropping. This often means construction and upgrading of facilities like packhouses, construction of on site dams, as well as greenhouses and high tech protected cropping facilities. Our industry's interactions with planning policy primarily revolve around the zoning of land and the process for achieving building approvals. Both these processes are problematic and are currently hampering our industry's growth and ability to make an economic contribution in the state. Another important consideration is that many of our growers operate in peri-urban areas affected by zoning and land use conflict.

Our submission to this review only addresses *Policy Position 8: Primary Industry* as outlined in the Discussion Paper. While we support the broad sentiments in the paper, we also make the following points below with respect to individual policies outlined in the Discussion Paper.

AUSVEG SA Submission in Response to Proposed Policies

Policy 1: *Identify and protect key primary production assets and secure strategic opportunities for future primary industry development*

The previous state government policy of creating arbitrary "greenzones" for agricultural production is unsuitable and does not take into account the preference of industry, particularly in peri-urban areas where it affects land values and creates winners and losers. While in regional areas some growers are seeking to protect agricultural land against encroachment, in peri urban areas growers have benefitted from investment through rezoning land for industrial or residential purposes. AUSVEG SA contends that, to account for differences in preference by area that these decisions are made at the community level through councils and/or other feedback mechanisms which ensure that community preferences are taken into account in this decision-making process.

AUSVEG SA does not support centrally-planned “greenzones” and urban growth boundaries as different communities have different preferences and needs. While there are concerns in places like Murray Bridge and the Riverland about urban encroachment, AUSVEG SA feedback is that areas such as the Northern Adelaide Plains are more open to the proposition due to opportunities for inbound investment which will allow businesses to reinvest further to the North or in other regions. A powerful example of the negative influence of arbitrary “greenzones” can be seen in Melbourne where growers in Werribee have been prevented from selling their land for development but those on the Mornington Peninsula have been able to take advantage of market forces and demand for residential land. Growers in Werribee today are locked into working smaller acreages (around 15-30 hectares each) due to a lack of inbound investment and constraints to growth whereas many growers on the Mornington Peninsula have grown to be 800-2,000 acre farms and some of the biggest vegetable farms in Australia. In this case one group has significantly benefitted from this investment by letting market conditions prevail and the other group have been artificially prevented from receiving these benefits.

AUSVEG SA accepts that residential and industrial growth needs to be managed and there is a differing opinion depending on the region. As such, we contend that these decisions are best made at the community level rather than centrally decided by state government bureaucrats with limited understanding of the complexities of primary production or regional issues.

Policy 2: *Create local conditions that support new and continuing investment in primary industry while seeking to promote co-existence with adjoining primary industries to avoid land use conflicts*

Policy 4: *Equitable manage the interface between primary production and other land use types, especially at the edge of urban areas.*

AUSVEG SA supports any efforts to increase local appreciation of the needs of primary production to increase understanding and alleviate land use conflicts. The majority of complaints AUSVEG SA is aware of relate to the issues of noise production or spray drift. As an industry, vegetables have strong industry driven quality assurance programs to deal with spray application issues and in our view these, as well as supermarket requirements offer sufficient protection for surrounding landholders in the vast majority of instances. AUSVEG SA would not support introduction of any additional regulations at the local government level as current schemes are adequate, however, proactive dispute mechanisms or other such proposals may be considered. With regards to noise, horticultural packing and transport often needs to occur late at night or early in the morning to ensure fresh produce is able to reach store shelves in peak condition for the consumer. We promote any proactive initiatives which might improve relationships between agricultural businesses and the local community however would not support any measures threatening to restrain agricultural production.

Policy 3: *Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction, and restructuring*

AUSVEG SA is aware of significant challenges for growers seeking planning approval for large scale protected cropping structures. In a number of past examples these buildings have been classed as

warehouse structures under planning codes with regulators demanding installation of \$400,000 fire suppression systems per building complex despite being full of non-flammable green plant materials. This reflects the lack of understanding of agricultural needs under the current system and the need for streamlined arrangements for key agricultural building approvals. Currently, approvals for complex projects involve multiple contacts with government such as the local council, Country Fire Service and planning department. In a number of projects AUSVEG SA is aware of obtaining approvals was a lengthy process and took years, hampering industry development.

In response to this issue, AUSVEG SA proposes that as part of the current reform process work is done to streamline the approval process for a number of typical building types within agriculture (machinery sheds, protected cropping facilities, packhouses) to reduce the number of agencies involved and allow for easier development of agricultural land for production.

AUSVEG SA is happy to work with the Department and provide on request the details of a number of growers facing these difficulties as well as national studies conducted into harmonising and improving the way approvals are managed for protected cropping facilities.

Conclusion

AUSVEG SA supports the intent of the planning policy discussion paper proposed by the South Australian Government and its efforts to balance the competing interests. In particular we would like to acknowledge the emphasis on ensuring that the needs and views of primary producers are taken into account in planning policy reform, something which has sadly been lacking for years.

While AUSVEG SA supports the overall intent of the discussion paper, we do offer the above comments as constructive feedback and criticism of the current system. We hope that through the current process the concerns of South Australian growers can be effectively addressed.

Yours sincerely



Jordan Brooke-Barnett

AUSVEG SA Chief Executive Officer