Policy Discussion Papers: Natural Resources and Environment; Integrated Movement Systems

Thank you for the opportunity to comment on these Policy Discussion Papers. I understand they are intended to stimulate community feedback on the content of the Planning and Design Code and inform the Commission’s deliberations regarding its delivery. PIRSA welcomes the prospect of a single Code and associated planning reforms.

As outlined in PIRSA’s recent submission on the draft State Planning Policies, supportive planning policies are needed that:

- protect key primary production assets and secure future economic opportunities;
- facilitate continuing investment in primary industries;
- enable primary industry businesses to increase productivity; and
- equitably manage interfaces between primary production and other land uses.

I would also like to highlight matters affecting primary industries and regions in the policy discussion papers on Natural Resources and Environment, and Integrated Movement Systems.

We note that the discussion papers focus primarily on urban and metropolitan themes. Whilst the water security and quality theme in the Natural Resources and Environment paper refers to primary industry and regional stakeholders, further consideration should be given to them throughout the discussion papers. This would help elicit effective commentary from primary industry or regional stakeholders.

In relation to the ‘Transitioning to the Planning and Design Code’ section and the content of the associated tables in both papers, PIRSA seeks further information on the proposals listed. They would be a useful starting point for conversations with State government departments, councils and other relevant stakeholders about priorities for a collaborative work program for development of the Code.
I acknowledge that the planning reforms will necessarily be largely urban and indeed metropolitan in their focus. Similarly, while the new Code will apply to all of South Australia, effort will, essentially follow the pattern of population and economic activity.

I am also aware that not all of the 'planning' concerns held by primary industry and regional stakeholders can be addressed through the Planning and Design Code. Some matters, such as issues related to freight networks, will rely on the anticipated new Regional Plans whilst others, such as the emerging need for harmonised building rules relating to large farm structures, are contingent on parallel reforms in other areas.

PIRSA is mindful that community and industry stakeholders have high expectations that the planning reforms will address a number of long-standing issues in the planning system. Therefore, PIRSA looks forward to the Code delivering tangible benefits to these stakeholders in the near future. Detailed comments on the discussion papers are at Attachment A, for your consideration.

I look forward to continuing to work together on this key reform opportunity and I would be happy to make PIRSA officers available to discuss these matters further.

Yours sincerely

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EXECUTIVE DIRECTOR
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ATTACHMENT A: SUMMARY OF COMMENTS

Natural Resources and Environment Policy Discussion Paper

p.10 (Climate change mitigation and adaptation) Second paragraph should include reference to droughts

p.15 Infographic Current figures for 2016/17: Agriculture, Food and Wine generated $19.9 billion in revenue, and accounted for more than 50% of SA’s Merchandise exports

p.16 Export statistic should now read “Over 50%”.

p.21 (Theme 2: Water Security and Quality) The content should highlight the role of water in economic production, eg. Northern Adelaide Plains (reclaimed water) and South East (groundwater resource)

p.22 (Theme 3: Biodiversity) Ecosystem services should also be mentioned. Reference http://www.environment.gov.au/biodiversity/publications/ecosystem-services-key-concepts-and-applications

p.22 (Theme 4: Coastal Environments) The marine environment should also be mentioned.

p.22 (Theme 4: Coastal Environments) The second sentence should include reference to commercial and recreational fishing.

p.22 (Theme 4: Coastal Environments) The second paragraph should note that coastal ecosystems also support valuable fishing and aquaculture industries.

p.30 (Key opportunities and challenges 2B, 2C) Provisionally a good objective, subject to detail about the proposed Overlay.

p.31 (Discussion Question: Should we instead use the 1956 flood data as an indicator of risk in the future?) Given the changes in water infrastructure since 1956, this idea could be made clearer.

p.34 (Key opportunities and challenges 4A-4F) This seems to be focused on protecting coastal developments from coastal hazards - rather it could focus on assessing and managing new coastal developments so that they are sustainable and minimise impacts on the coastal and marine environments.

p.35 (Key opportunities and challenges 4G) The meaning of “aquaculture zones” and “buffer widths” in this context should be clearer; and it should be clearer if this is referring to aquaculture development in marine waters or on land, or both.

Integrated Movement Systems Policy Discussion Paper

Aspirations in the discussion paper should be made more relevant to regional areas.

The emphasis in the discussion paper appears to be on increasing public transport and active travel in Adelaide. There are only few references to protecting transport corridors and enhancing freight movement. Mention of transport in regional areas should be included that also acknowledges the challenges associated with transport in regional areas and connecting regions together.

The discussion paper should also include more on movements within waters of the state (i.e. marine and freshwater), and include marine areas protected for strategic transport corridors (i.e. shipping lanes); boat ramps, wharves, harbours, etc as these facilities are essential for integrated movement by the fishing (commercial and recreational) and aquaculture sectors.