



**Government of South Australia**

South Australian Murray-Darling Basin  
Natural Resources Management Board

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Ms Sarah Elding,  
Project Lead State Planning Policies  
Department of Planning, Transport and Infrastructure  
Level 5, 50 Flinders Street, Adelaide 5000  
GPO Box 1815, Adelaide SA 5001

Dear Ms Elding,

The SA Murray-Darling Basin Natural Resource Management Board (the Board) would like to submit some comments on the Draft State Planning Policies for South Australia currently out for public consultation. General comments from the Board to be noted:

- 1) The Board supported all the recommendations put forward in the paper
- 2) The Board provided the following comments:
  - Misconceptions may surround the terms that are used in the policy documents ie what Natural Resource Management (NRM) bodies mean when they use the term 'Environmentally Sustainable Development' is different to what DPTI mean. Also in relation to the terms 'Regional Plans' and 'Regional Boards'; these terms currently exist in NRM and there needs to be clear communication to communities that these are different in a State Planning policy context.
  - That the Board encourage a strong connection and understanding of the relationship between the State Planning Regional Boards and Regional Plans to the existing NRM Boards and plans (or Landscape SA Boards and plans as they may become) and local government plans.
  - That the Board are keen to have more involvement in the process to understand exactly how they can help with implementation and achieve the best possible results for the environment.

Other specific comments relating to sections in the Draft State Planning Policies for South Australia from Natural Resources SA Murray-Darling Basin staff to be included in this submission can be found in 'Attachment\_Table 1 State Planning Policy Submissions by NR SAMDB staff'.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sharon Starick', written over a light grey horizontal line.

Sharon Starick.  
**Presiding Member**  
**SA Murray Darling Basin NRM Board**

**Table 1.** Natural Resources SA Murray-Darling Basin staff comments relating to document **Consultation: Draft State Planning Policies for South Australia July-September 2018**

Underlined sections are proposed additions to current text in draft policies, others are comments as indicated.

<b>State Policy</b>	<b>Policy No.</b>	<b>Landscape Team : Wendy Stubbs</b>	<b>Sustainable Agriculture Team: Tony Randall</b>	<b>Water Resources Team: Mardi Van Der Wielen</b>
Integrated planning		<i>Comment:</i> Generally happy with intent of policies.	<i>Comment:</i> OUTER SUBURBS: Where possible avoid interfacing intensive agriculture with urban development as land use conflicts are often realised. MIDDLE SUBURBS & MASTER PLANNED COMMUNITIES, INNER SUBURBS & INFILL DEVELOPMENT & CITY CENTRE: Where possible provide opportunities for urban community interaction with rural community eg. Farmers markets	
State Planning Policy 5: Climate Change	6		'Protect <u>and enhance</u> areas that provide biodiversity and ecological services and maximise opportunities for carbon sequestration.' 'The Planning and Design Code should implement state policies by including a range of Overlays that identify both the hazards that need to be considered when proposing new development and the features that should be protected due to their contribution to climate resilience, e.g. coastal dunes and natural <u>and agricultural</u> environments that sequester carbon.'	

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State Planning Policy 8: Primary Industry	Introduction		'South Australia's agricultural, <u>horticultural</u> , forestry, fisheries and aquaculture industries are fundamental to our prosperity and identity' 'protecting key <u>natural resource</u> , <u>built and social</u> assets and securing emerging strategic opportunities'	
State Planning Policy 8: Primary Industry	Objective		'A diverse and dynamic primary industry sector making the best use of natural, <u>built</u> and human assets.'	
State Planning Policy 8: Primary Industry	3		'Enable primary industry businesses to grow, adapt and evolve through technology adoption, <u>transport and infrastructure provision</u> , intensification of production systems, business diversification, workforce attraction, and restructuring.'	

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State Planning Policy 8: Primary Industry	Non-statutory Guidance Notes		'Regional Plans should implement state policies by ensuring that key assets underpinning the Region's current and potential future primary industry development in agriculture, forestry, fisheries and aquaculture are identified and protected. At the edge of urban areas, and wherever primary production meets other sensitive land use types, consideration should also be given to measures that equitably manage that interface <u>without encroachment upon key and strategic primary industry assets and land uses.</u> '	
State Planning Policy 8: Primary Industry	Related SPPs		<i>Comment:</i> A State Planning Policy for Soils should be developed. Soils are a key economic resource and are suitable different to key resources which seems to focus on mining and extractive industries.	
State Planning Policy 14: Water Security and Quality	Introduction		<u>Water re-use for agricultural purposes is planned for and developed strategically to service high demand intensive horticulture and agricultural industries.</u>	

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State Policy	Policy No.	Landscape Team : Wendy Stubbs	Sustainable Agriculture Team: Tony Randall	Water Resources Team: Mardi Van Der Wielen
State Planning Policy 14: Water Security and Quality	2			<p>‘Prioritise the protection of water supply catchments including, <u>but not limited to:</u>’  <i>Comments:</i> There are also locally important water supply areas outside the 4 types listed – right down to the scale of individual dams and wells providing stock and domestic water needs, which are critical in areas where there is no reticulated water supply. Probably a bit much to specifically include this in the list, but at least make it clear that the list is not the only things that will be considered via the suggested addition</p>
State Planning Policy 14: Water Security and Quality	3			<p>‘Provide for infrastructure and land use policy that aims to decrease flood risk...<u>while maintaining water-dependent ecosystems.</u>’  <i>Comments:</i> Flooding can be a natural process that is ecologically important. It is important to decrease the risk of flooding on human assets, but this should be done in a way that considers environmental impacts too (e.g. undertake works to mitigate additional flooding risk caused by development but in a way that retains natural flooding patterns; making sure development is located in places where the risk of flooding is reduced rather than works to reduce natural flooding patterns)</p>

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State Policy	Policy No.	Landscape Team : Wendy Stubbs	Sustainable Agriculture Team: Tony Randall	Water Resources Team: Mardi Van Der Wielen
State Planning Policy 14: Water Security and Quality	4			<i>Comment:</i> Perhaps this should reference the concept of ecologically sustainable development (as per the objects of the NRM Act – section 7) to provide more guidance on the balance between social, economic and environmental needs (e.g. perhaps ‘Support ecologically sustainable development by ensuring our water supply...’)
State Planning Policy 14: Water Security and Quality	Non-Statutory guidance notes		<p>‘Regional Plans should implement state policies by identifying areas for the growth and location of future development and associated short and long-term water infrastructure <u>and re-use</u> requirements and serviceability. Regional catchments should be identified to understand the upstream and downstream impacts. Watershed areas should be identified and mapped <u>for strategic protection.</u>’</p> <p>‘The Planning and Design Code should implement state policies through the inclusion of an Overlay to ensure development mitigates adverse impacts on our water supply <u>and maximises opportunities for re-use and recycling.</u>’</p>	<p>Suggest including something like; ‘<u>Regional plans and processes should integrate with state and local natural resources and water plans and policies.</u>’</p> <p><i>Comment:</i> A lot of work has already been done on developing water management policies – the development system should be integrated with this (avoid duplication or omission). The document includes some quite specific suggestions in this section (regional catchments should be identified; watershed areas should be identified and mapped) – it may be better to link with existing documents and plans that already include this (as well as other management policies) rather than repeating this work in the regional plan for development.</p>

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State Planning Policy 14: Water Security and Quality	Related legislation and instruments section:			Refers to the Water Resources Act 1997 – this Act has been repealed (replaced by the NRM Act) – suggest deleting this reference Perhaps should also refer to the Commonwealth Water Act (2007) – particularly relevant for Murray-Darling Basin
State Planning Policy 15: Natural Hazards	1		'Identify and minimise the risk to people, property and the environment from exposure to natural hazards including bushfire, terrestrial and coastal flooding <u>and</u> erosion, dune drift and acid sulphate soils.' <i>Comment:</i> ensure soil erosion is included.	
	2	<i>Comment:</i> Emphasise the importance of using the risk hierarchy; avoidance of development in areas at high risk of natural hazard eg. Prevent people from building within/ adjacent to bush, instead of then managing the bush to reduce the risk to the development.		