11 November 2019

Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Email: DPTI.PlanningEngagement@sa.gov.au

Dear Sir/Madam


Adelaide Hills Council is grateful for the opportunity to provide feedback on the Policy Discussion Paper released for community consultation by the State Planning Commission on 25 July 2019.

In preparing this submission a review of the Paper was undertaken including consultation with Council Members and relevant Council staff.

Support of Intent of Policy Discussion Paper

At the outset Council would like to acknowledge that the Policy Discussion Paper demonstrates the State’s commitment to ensuring that an adaptive and responsive Planning system framework supports a vital and burgeoning renewable energy sector and this is to be applauded.

Due to the unlikelihood of large scale solar and wind projects to be established in the Adelaide Hills Council area, many of the policy responses would have limited applicability to the district. Notwithstanding this, there are some emerging themes in our Council Area that may warrant additional nuanced policy responses.

Solar Panels in Association with Horticultural Production

The Apple and Pear Growers Association of South Australia (APGASA) recently secured funding to assist growers with upgrading their existing water pumping systems and installing associated solar technology to reduce electricity costs and assist in improving the sustainability and efficiency of their operations. Where possible the solar systems have been mounted on rooftops. However, where this option is not available due to the location of the pump in relation to farm buildings, growers have opted to install ground mounted solar systems. The installation of such systems requires Planning Approval and currently due to the restrictive nature of the Watershed (Primary Production) Zone, places considerable procedural burden on the applicants.
The benefit to growers of reducing energy costs will support the ongoing viability and resilience of their businesses, and as such Council considers that a streamlined development pathway should be established to reduce the procedural burden for small-scale ground mounted solar power facilities constructed in association with horticulture.

It is noted that this pathway should be made available within the proposed Peri-Urban and Rural Zones and that any such pathway must be assisted by a relevant definition for such facilities. In the Peri-Urban Zone it is also considered necessary to ensure that landscape scenic quality is not undermined by the installation of such systems in particularly sensitive locations i.e. near scenic routes (which we note have not been included in the draft Code).

Council would encourage the State Planning Commission to develop an appropriate pathway in consultation with relevant council's and industry groups such as the APGASA.

Summary

In summary, Adelaide Hills Council is excited about the opportunities that may result from the planning reforms, in particular the modernised policy suite as outlined in the Renewable Energy Policy Discussion Paper that will support the burgeoning renewable energy sector whilst protecting the South Australian community. We look forward to having the suggestions as tabled in this submission included where appropriate in the Planning and Design Code.

If you have any queries regarding the above comments then please do not hesitate to contact me on [redacted].

Yours sincerely

Marc Salver
Director – Development and Regulatory Services