Dear Mr Anderson,

Thank you for providing the South East Natural Resources Management Board (Board) with the opportunity to comment on the public consultation of the draft State Planning Policies of South Australia (SPP) relating to the implementation of the Planning, Development and Infrastructure Act.

The Board conducted a review of the SPP at its meeting on 23 August 2018 and considers the following comments to be an integral part of the development of the SPP for South Australia. Key elements that may be improved in the draft SPP include:

1. Clarity in the document context is needed to merit a state-wide approach
2. Inclusion of a hierarchy to clearly state the policies, their relationship and priority
3. The document presents bias towards urban activity, opportunity exists to better acknowledge the regional network within the draft
4. Principals of the Biodiversity Policy are not consistent with the interaction of relevant policies and may be considered conflicting

The Board values the opportunity to offer feedback on the SPP and the Government’s priorities and are pleased to work with the South Australian Government to ensure its effective implementation. Attachment 1 presents further comments to support the Board’s submission through the public consultation process.

If you would like to discuss these comments further, please contact Wendy Telfer, Manager Planning and Evaluation, Natural Resources South East on [Contact Information] or [Contact Information].

Yours sincerely

[Signature]

Presiding Member
South East Natural Resources Management Board
Attachment 1:

Public Consultation for the draft State Planning Policies of South Australia (SPP) are provided by the South East Natural Resources Management Board.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Policy</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 1:</td>
<td>Integrated Planning</td>
<td>• The context and language presents significant focus on Adelaide and city references. Consideration of regional reference is recommended.</td>
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<tr>
<td>Policy 2:</td>
<td>Design Quality</td>
<td>• Nil comment</td>
</tr>
</tbody>
</table>
| Policy 4: | Biodiversity | • Policy is considered very broad.  
• Consideration of conflicting  
• Page 28, the Biodiversity section, the order of the Policies should be re-worked as Policy 2 should logically come before policy 1. i.e. “minimising the loss of biodiversity” should precede “protect and minimise impacts of development”. |
| Policy 5: | Climate Change | • Nil comment |
| Policy 6: | Housing Supply and Diversity | • There seems to be a high volume of detail compared to the other policies.  
• Clarity is needed for the reference to “retail”  
• Reference is specific to Adelaide operations only. |
| Policy 7: | cultural Heritage | • Access and providing protection |
| Policy 8: | Primary Industry | • This policy will need to coexist with the principals of the Biodiversity policy  
• This indicated a sense of a typical business model that may need to be revised to be realistic  
• Consideration of reference towards soil management and the adverse impacts relating to soils  
• Suggested revision of wording: Best use of natural and human assets – may be better interpreted as “natural resources”  
• Consideration of reference to water in this policy would be highly recommended  
• Policy is very vague – what is low intensity recreational uses? Does it include driving vehicles on beaches? More detail required or a better description of “low intensity recreational use” |
| Policy 9: | Employment Lands | • Business use (enterprise, commercial) employment  
• Top five mandated topics |
| Policy 10: | Key Resources | • Nil comment |
| Policy 11: | Strategic Transport Infrastructure | • Consideration of the location and design of transport freight and terminals should be considered as a risk (contamination)  
• Define how this policy supports Biosecurity  
• Consider a risk assessment process for forestry activities outside of the NRM areas. |
| Policy 12: | Energy | • Nil Comment |
| Policy 13: | Coastal Environment | • How does this policy interact with biodiversity?  
• Clarity is needed as to who qualifies and defines what is a priority in this policy?  
• Tourism – no policy reference protecting coastal areas by tourists  
• Page 58, central to all the policies is identifying current and future coastal hazards (including coastal flooding, erosion, inundation etc). This has not occurred yet and policy should really stipulate that state wide modelling of projected climate change impacts will be undertaken and provided to councils and other relevant groups/agencies with a development interest as overlays for planning schemes etc. |
| Policy 14: | Water Security and Quality | • Provision of link to all water policies  
• Mt Lofty is mentioned specifically (a)  
• No Consideration to regional water NRM Plans  
• Protection of surface water and not only ground water  
• Consider water for environment  
• |
| Policy 15: | Natural Hazards | • Consider implementing a risk assessment process for forestry (Water risks) and hazards outside of NRM forest areas.  
• Page 62, “natural hazards” in Policy 5 – “protecting key coastal areas and infrastructure” should include planning for retreat in some areas. |
| Policy 16: | Emissions and Hazardous Activities | • Nil comment |