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Friday 21 September 2018

Dear Ms Smith

Primary Producers SA (PPSA) welcomes the opportunity to provide feedback on the draft State Planning Policies (SPPs). It is critical that planning provisions balance the need to support opportunities for growth and development in our industries while also providing protection for our industries against encroachment from incompatible land uses.

Industry must be engaged early and extensively on the ongoing development of the policy underneath the SPPs which will impact primary producers – particularly the Planning and Design Code – as well as any new State Planning Policies. This is particularly the case given that there is no requirement for industry knowledge (and therefore knowledge or understanding of primary industry), nor knowledge of rural or regional issues, within the State Planning Commission. The Spatial Atlas and the “spatially referenced Zones, Sub-Zones and Overlays” mentioned on page 8 should also be the subject of careful consultation with industry.

Environment and Food Production Areas are clearly of particular interest to primary producers, along with any urban growth boundaries and policies. The need to maintain primary production land – using smart and sophisticated instruments/policies – and to undertake strategic planning is supported. However, concerns have been expressed also about blunt policy instruments associated with urban growth boundaries. These concerns relate to the diminished power of local communities and landholders to influence these planning policies, impacts on land values and the flexibility for growers to subdivide or sell land in the future. This highlights some of the complexities to be considered and some of the risks associated with blunt policy instruments.

For example, for higher intensity primary production, the block sizes required can be significantly smaller and labour requirements (and the accompanying needs for nearby housing) are higher. Vertical integration and strong linkages between primary production and processing also need to be taken into account. As planners generally become aware, the ability for older generations of primary producers to support their retirement is commonly a critical element in the ongoing success of the business for the next generations.

In addition, land use conflict is not limited to urban encroachment (i.e. rural-urban conflict) and there is a need to manage issues such as mining and gas activities, conflict between rural land uses (e.g. due to chemical use regimes and the need to manage spray drift issues) and between rural land uses and other land uses. These areas need to be carefully managed.

### **State Planning Policy 1: Integrated Planning**

Policies to protect rural productive areas from urban encroachment need to be considered much more widely than just around the Greater Adelaide area.

Future growth areas need to be supported by essential infrastructure such as roads, rail, ports etc. Integration with, and expansion of, existing infrastructure networks is supported, especially in regional planning.

## **State Planning Policy 2: Design Quality**

Good design is important not only in urban areas; and rural and industry outcomes need to be considered (not just urban form outcomes). However, in the industry context, good design needs to occur within the constraints of cost and the need to be cost-competitive (locally, nationally and internationally). Ideally, good design could assist industry to be more efficient and/or manage costs, with function/functionality (e.g. encompassing industry's infrastructure requirements) a key consideration.

The imperative to keep costs at reasonable levels for industry should be recognised as a strong driver throughout all planning policy – including the Planning and Design Code, in particular, and Regional Plans.

The principle that “Planning and design should be undertaken with a view to strengthening the economic prosperity of the state and facilitating proposals that foster employment growth” is supported.

## **State Planning Policy 4: Biodiversity**

PPSA supports the need for planning policies to consider biodiversity. The recognition that “modified landscapes can have environmental values” (i.e. it is not the case that biologically diverse landscapes can only be achieved on protected public lands) supported. Furthermore, the SPPs need to recognise that modified landscapes that have significant environmental values can coexist with land uses such as primary production.

## **State Planning Policy 8: Primary Production**

PPSA believes that recognition of the important contribution that primary industries make to the State is essential to the SPPs. The downstream benefits of primary production in generating socio-economic value and in the social cohesion of local and state communities also need to be recognised.

Planning policies need to ensure that primary producers have the freedom to be able to continue to operate their farming businesses, without encroachment from competing land uses such as urban sprawl, mining, or other incompatible forms of land use. There is little recognition in planning policies of the importance of farming tenure and heritage when the use of land adjacent to farmers changes.

Planning for primary production is essential to ensure that the best agricultural land remains available for food and fibre production. The land suitable for arable agricultural production (i.e. cropping in particular) is finite; less than 5% of the South Australia's landmass. Once converted to an alternative land use, it is extremely difficult (if not impossible) to rehabilitate that land back to its productive state.

PPSA supports the freedom for farmers to be able to continue to operate, develop and invest in their farm business. With this in mind, we support the four proposed policies underpinning this SPP; noting that equitable management of primary production interfaces needs to take into account all of the values flowing from primary production, as mentioned above.

Point 3 under State Planning Policy 10 – “Identify and maintain strategic transport corridors and other key infrastructure required to support...activities [of the sector] and their supply chains” – should be added also to State Planning Policy 8 for primary industry.

## State Planning Policy 9: Employment Lands

PPSA supports the need to be able to provide a suitable supply of well serviced and strategically located employment lands to support the growth and diversification of our economy. Connections to markets through freight corridors, telecommunications and other infrastructure is essential for the growth of primary industries and regions.

While this SPP has a metro-centric focus, PPSA does support the underpinning policy point 2, provided that primary industries are recognised as a state-significant industry:

Point 2: Support state-significant operations and industries and protect them from encroachment by incompatible and/or more sensitive land uses.

## State Planning Policy 10: Key Resources

Policies:

1. Define and protect mineral resources operations, associated infrastructure and undeveloped mineral resources from encroachment by **incompatible land uses**.
2. Plan for and implement development in the vicinity of undeveloped energy resources, energy resources operations and associated infrastructure to ensure their ongoing safe and efficient operation.
3. Identify and maintain strategic transport corridors and other key infrastructure required to support resource sector activities and their supply chains

PPSA does not support the protection of mineral resource operations over existing land use, such as primary industries. The SPPs should minimise the potential for land use conflicts between incompatible land uses, such as mining and farming. Recognition should be made in the SPPs of the existing land use and protect farmers' freedom to operate their businesses without encroachment from incompatible land uses such as mineral exploration/mining.

What is the definition of "**incompatible land uses**" as highlighted above? Are existing agricultural operations considered an "incompatible land use" in this context when standing in the way of a proposed mining development?

Effective land use planning is crucial to protect the capacity of primary producers to be able to generate income for the state. Existing land uses and resources should be protected from encroachment by mining. Buffer zones required to be established between existing and incompatible land uses should be established on the new land use, as a default.

The following points on page 46 are *not* accepted:

"It is essential that *land use planning and mining legislation* complement each other to:

- facilitate investment and underpin the future economic prosperity of South Australia
- minimise the risk of adversely affecting the state's mineral and energy resource assets
- maintain ongoing access to long-life, valuable resources, including construction materials
- minimise the potential for land use conflicts between incompatible uses, including the implications of urban encroachment
- facilitate appropriate post-mining land uses."

It is unclear why the mining industry should be provided with greater protection and development planning assistance through legislation than existing profitable industries such as agriculture, horticulture and viticulture. PPSA does not support this policy in its present form.

## **State Planning Policy 11: Strategic Transport Infrastructure**

PPSA recognises the important role that transport infrastructure plays in the economic performance of our primary industries. Access to safe, efficient and reliable freight pathways is fundamental to our produce reaching markets cost-effectively.

The following points are supported:

- Enable an efficient, reliable and safe transport network connecting business to markets and people to places (i.e. where they live, work, visit and recreate).
- Support the long-term sustainability and management of transport assets and the various modes that use these assets.
- Allow for the future expansion and intensification of strategic transport infrastructure and service provision (corridors and nodes) for passenger and freight movements.
- Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).
- Enable development that is integrated with and capitalises on existing and future transport functions of transport corridors and nodes.

However the text that “South Australia also relies on our efficient and reliable aviation sector and sea ports” should probably be amended to “an efficient and reliable aviation sector and sea ports” as the cost efficiency of our sea ports, in particular, could be queried.

## **State Planning Policy 12: Energy**

Energy security provides business confidence to our primary producers to allow continued innovation and investment in this important sector. We support the intent to ensure renewable energy technologies are there to support a stable energy market and continued supply for our industries, but planning must ensure that the placement and development of these renewable energy sources does not adversely affect the reliability and/or cost of power – and thus the amenity of regional communities nor the productive capacity of the land.

## **State Planning Policy 14: Water Security and Quality**

The intent to “provide for the protection and security of the state’s water supply to support a healthy environment, vibrant communities and a strong economy” is supported.

“Prioritise the protection of water supply catchments including...” (page 60) should be amended to: “Prioritise the management of water supply catchments including...” to reflect the significant levels of use of many of the water resources listed, for many and varied purposes. Also on page 60, the wording of the second and third sentences under “Regional Plans” is not clear.

## **State Planning Policy 15: Natural Hazards**

“Development will not be permitted or will need to meet specific design standards in areas that are high risk or vulnerable locations” (page 62) should be amended to: “*Certain types of development may be prohibited or required* to meet specific design standards in areas that are high risk or vulnerable locations”.

“[Developments] must also not result in ongoing cost burdens associated with their protection...” should instead specify that “[Developments] should not result in ongoing *public* cost burdens...”.

**State Planning Policy 16: Emissions and Hazardous Activities**

Policy 1. Ensure our communities and the environment are protected from risks associated with emissions and radiation activities while ensuring that industrial and infrastructure development remains viable through:

- a. Ensuring appropriate zoning and mixed uses are compatible
- b. Avoiding establishing incompatible land use interfaces through encroachment on industrial sites by maintaining adequate separation distances
- c. Incorporating engineering controls into building design where emissions or impacts are unavoidable

PPSA supports the general intent of this SPP, but in highlighted point b. above would like consideration to be given to any separation or buffer distances between developments to be imposed on the new development, not on the existing land use.

We would like to thank the State Planning Commission for the opportunity to provide feedback on the draft State Planning Policies and we look forward to hearing the outcomes of this consultation.

For more information or to discuss this matter further, please don't hesitate to contact Rob Kerin on [redacted] or [redacted] or Amy Williams on [redacted] or [redacted].

We look forward to ongoing involvement and discussions on these matters.

Yours sincerely



Rob Kerin  
**Independent Chair**  
**Primary Producers SA**



Joe Keynes  
**Chair, NRM Committee**  
**Primary Producers SA**