OUR NEW SYSTEM

WHAT WE HAVE HEARD REPORT

NATURAL RESOURCES AND ENVIRONMENT POLICY DISCUSSION PAPER

Introduction

The Natural Resources and Environment Discussion Paper is one of a series of policy discussion papers designed to stimulate thought on the policy direction for land use in the Planning and Design Code (the Code).

Engagement was undertaken on this paper between 6 August and 3 December 2018 and was supported by a "YourSAy" site that provided further opportunity for respondents to provide their feedback on the key issues raised in the paper.

This report summarises the responses received by the State Planning Commission from numerous stakeholders, including state government departments; agencies and committees; local councils; industry professionals and representative organisations; and the community. The engagement will be used to inform the State Planning Commission's preparation of the Code.

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Overview of feedback

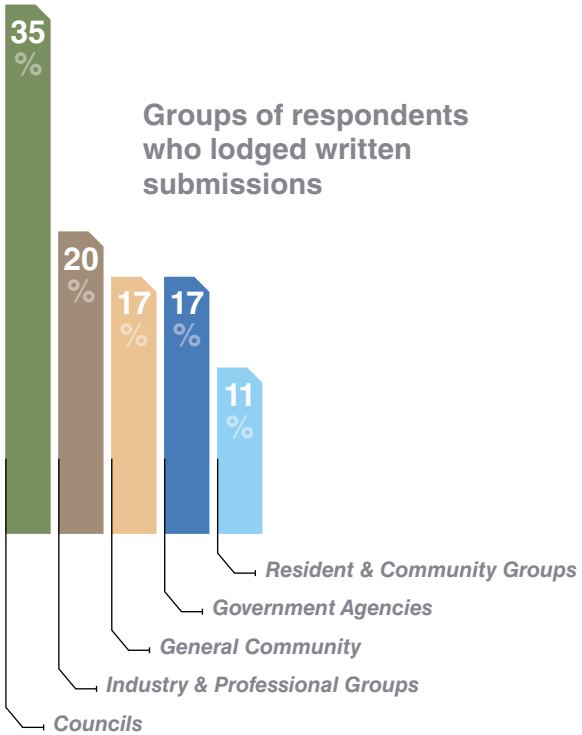
The responses to the Natural Resources and Environment Discussion Paper revealed a high level of support for the recommendations in the paper and a general recognition that the protection of natural resources and the environment is directly related to livability and long-term sustainability.

A large proportion of submissions emphasised the importance of climate change and the impact of growth and development on our natural assets and general landscape, beyond urban areas.

Respondents generally recognised that climate-related risks, coupled with potential development impacts, could present greater challenges in how communities maintained their resilience and adaptability in a changing world.

These risks could be mitigated through contemporary building design and construction; the management of water security and water quality; and the protection of the natural features of our urban environment and regions.

Many respondents felt that the reforms outlined in the paper represented an important opportunity to better reflect natural resources and environment in the development of the Planning and Design Code.



Analysis of written submissions

Theme 1: Sustainable and livable urban environments

1.1 Green infrastructure and water-sensitive urban design

Key opportunities and challenges

Many respondents identified the following common challenges:

- Meaningful uptake of Green Infrastructure (GI) and Water Sensitive Urban Design (WSUD) measures is dependent on there being a sufficient range of scalable options that can be applied to a variety of development types and locations (including off-site solutions where appropriate).
- In order to support increasing rates of infill, there is a need to 'fast-track' simple WSUD measures for small-scale infill that can be easily adopted.
- The WSUD policy in the South Australian Planning Policy Library (SAPPL) will require further research and consultation in order to be ready to transition to the Planning and Design Code.
- In order to improve WSUD and GI outcomes, policy needs to be fit-for-purpose and able to be applied at different urban scales – this will require improved coordination between catchment scale objectives and planning policy.

Respondents noted that the first generation of the Code represented the opportunity to:

- integrate and mandate certain policy and performance measures, rather than making them optional
- transition existing Urban Corridor Zone GI and WSUD provisions but apply them more widely as an interim measure
- utilise existing resources such as Water Sensitive SA online assessment tools to provide examples that could be readily adapted for lower-scale development
- introduce planning guides and WSUD manuals that draw from a range of interstate examples to guide South Australian reforms.

Discussion question

Should existing WSUD and GI policies also apply to regional areas and for all development scales and types?

Respondents typically supported WSUD and GI policies being applied to regional areas as there are many regional settlements that are comparable to townships in Greater Adelaide.

1.2 Energy-efficient design

Key opportunities and challenges

Many respondents expressed concern that energy-efficiency principles and standards are 'tokenistic' and are often considered only at the building stage.

Challenges identified include the following:

- Unreasonable standards should not be enforced on the development sector and housing affordability and commercial viability needs greater consideration in all policy responses.
- Many provisions in the National Construction Code do not have sufficient regard for passive energy-efficiency techniques (i.e. applying passive energy-efficiency principles at the planning stage - including land division - could reduce construction cost and energy costs over the life of a development).

Respondents also noted opportunities to achieve the following:

- use various building code requirements as *minimum* requirements or deemed-to-satisfy outcomes, as well as other interstate examples, to assist in the planning assessment framework
- introduce performance indicators for natural ventilation, external shading, and improved building envelopes that require less artificial heating and cooling
- apply energy-efficiency principles to non-residential buildings (particularly offices, consulting rooms, schools).

Discussion questions

What role should the planning system play in preventing solar panels from being overshadowed?

Many respondents believed that the planning system should play a role in the preservation of solar access. Others noted the question was framed too broadly and a small number suggested that the extent of existing policy is sufficient.

Some respondents indicated that minimum levels of solar access should be maintained even when panels are not yet established.

Other respondents envisaged that a requirement to provide a solar impact or shading report at the application stage would trigger applicants to consider the positioning of panels on their development with regard to future overshadowing based on permitted building heights of adjoining sites. A number of respondents also felt there would need to be associated mechanisms available for developers to mitigate any unreasonable effects (e.g. re-locate affected panels to the taller proposed development, purchase access to a remote solar system, etc).

Should the Code introduce incentives for passive solar design (siting) techniques, GI and WSUD?

Many respondents indicated that 'incentives' could be interpreted as 'optional' requirements, and that this was not the preferred message. Some respondents felt that the need for incentives may be alleviated by the use of real case studies that demonstrate the benefits of GI and WSUD.

Other respondents indicated that incentives may be useful depending on the circumstances (i.e. incentives to achieve more than the minimum requirements of a particular element could be more appropriate for over-height developments, or potentially in regional areas where there may be greater affordability issues).

Other submissions, particularly from the local government sector, pointed to the disadvantages of possible performance or deemed-to-satisfy measures relying on activities that are not 'development' in their own right (i.e. hard paving versus permeable paving or other landscaping).

1.3 Waste management

Key opportunities and challenges

Many respondents considered waste collection to be an essential service (like power and water) and felt that planning should require an appropriate design for collection by a local service provider. Typically higher density infill has consequences for how that service is delivered (notably the impact on accessibility of collection vehicles, conflict with on-street parking and use of the road verge for additional bin storage).

The potential for high-rise or similar large-scale development to create demand for private services is commonly identified as an equity issues for future owners and occupiers in terms of ongoing costs. A common topic in many submissions was that medium and high-density development could be inadequately managed, creating contamination in the waste stream. Many submissions advocated for a waste management and collection plan, prepared by a suitably qualified person, to be submitted with applications of this type.

Achieving minimum standards for road widths in multi-unit developments for access by waste collection vehicles was directly related to whether a council service could be provided. Land division and site planning minimum requirements could provide greater guidance in this area. A small number of submissions indicated that a greater level of design response was required to eliminate the need for private contractor arrangements.

Management of demolition and construction waste, and recycling of building materials and adaptive reuse of buildings, were also identified in some submissions as part of a waste management hierarchy that could be applied to development.

Discussion question

How do we plan for current waste removal practices and technologies and provide flexibility for innovative future solutions?

Many submissions referred to the existing Zero Waste (SA) better practice guidelines as an example of design quality policies that could be translated to the Code.

Engaging with waste management experts was considered important in the first generation of the Code, but future waste management solutions should be able to be incorporated in later generations of the Code when required.

Other suggestions included:

- using waste levy funds for the development of technology to create uses for recycled materials that are currently collected
- investigating emerging technologies such as high efficiency incineration, anaerobic digestion and other solutions employed in other states and countries
- engaging with waste managers who are well advanced in their knowledge and/or application of new technologies and requisite design needs.

Many respondents indicated that emphasis should be placed on sorting waste at the site of origin (e.g. creating pure streams of waste at the household and business level, rather than sorting this off-site later). They recommended that there should be a greater emphasis on meeting minimum requirements for waste storage for higher-density, mixed-use developments during the planning stage, rather than addressing these requirement after the fact. These requirements could relate to ventilation, physical space, and accessibility to shared bins of different waste streams.

Typically, respondents felt that the Code should be accompanied by supporting guidelines that addressed different scales of development (greenfield, multi-unit buildings, high-rise and small-scale infill).

Theme 2: Water security and quality

The majority of submissions supported the proposed policy responses to water security and quality and argued that these policy directions should be incorporated into the first generation of the Code.

There was general support for the continued use or development of additional overlays (and sub-overlays) to connect land-based impacts with water quality and security in key areas.

Many respondents advocated for improved integration between the planning system and Department of Environment and Water (DEW) approval processes in Water Protection Areas (WPAs).

A number of related issues were raised, including the fact that:

- dams assessed under the *Natural Resources Management (NRM) Act 2004* (and the proposed *Landscape SA Act*) only consider the impact of a dam as a water-affecting activity, without consideration of visual impact
- dams assessed and approved under the current planning system are not mapped in the state geographic database, making the monitoring, compliance and follow-up difficult from an NRM perspective
- referral triggers are difficult to interpret and these need to be improved in order to ensure that water is not inappropriately diverted from watercourses
- current Development Plan policy does not adequately address all relevant assessment matters related to dams e.g. initial construction, dam suitability and ongoing maintenance and use
- more policy guidance is specifically needed on dams within and outside of flood-prone land
- more policy guidance is generally needed on stormwater reuse; the recharging of aquifers; reservoirs; watercourses; and coastal marinas

A small number of submissions also suggested that current reforms provided the opportunity to incorporate "clean site" guiding principles that would help councils comply with the SA EPA Water Quality Policy 2015 and the *Local Nuisance and Litter Control Act 2016.*

2.1 Mount Lofty Ranges (MLR) Watershed Protection Area

In addition to the above general opportunities and challenges, some isolated submissions made the following recommendations:

- development of a consistent policy response to WSUD and GI in the MLR WPA townships, notwithstanding they might also be applicable in other parts of regional council areas generally
- development of a policy approach that recognises the different impacts of horticulture, noting that intensive annual cultivation leads to greater soil disturbance and more intense nutrient and pesticide application than perennial horticulture
- creation of incentives to encourage the on-site treatment of wastewater
- creation of a comprehensive list of non-complying forms of development and strict policies around this.

2.2 Other Watershed Protection Areas

Key opportunities and challenges

A number of submissions supported the proposed policy recommendations set out for Other Watershed Protection Areas, subject to further detail about the proposed overlay for this theme and clear objectives being set out to support the ecological health of rivers.

Discussion question

Should dams be assessed as development in the planning system?

The majority of respondents supported the idea of dams being assessed as 'development' in Water Protection Areas (WPAs), including the Mount Lofty Ranges (MLR) WPA.

Respondents generally felt that dams should be assessed in terms of neighbouring and downstream impacts, as well as visual impact. Those few that were of a contrary opinion perceived there to be insufficient expertise in the planning system to

assess dams and/or believed that dams on private land should not be controlled at all.

Some metropolitan councils advocated for planning policy that would allow them to continue to create stormwater retention basins and associated infrastructure at a neighbourhood level.

2.3 River Murray

Key opportunities and challenges

Respondents generally supported a consistent policy response to development in River Murray council areas, in addition to the use of overlays to delineate between areas where different polices and/or referrals applied (e.g. tributaries).

Discussion questions

Should an overlay be developed which aligns with (1) the River Murray Water Protection Area (recommendation 2F), or (2) the 1956 flood data, as an indicator of future flood risk?

Respondents outlined the following main themes:

- 1956 flood data may have reduced relevance as a baseline for planning considerations due to climate change and the introduction of river-regulating infrastructure (weirs, dams, locks, diversions etc).
- 1974 flood level data may be used as an appropriate substitute for older flood data for development assessment purposes in certain circumstances
- Working collaboratively with councils, the Department of Environment and Water (DEW), Bureau of Meteorology, NRM Boards and other stakeholders will be important in obtaining more detailed analysis of various river flow scenarios and consequences.

Should sheds be made an exemption from the requirement to refer notice under the River Murray Act 2003?

Respondents who answered this question indicated that their support for a referral exemption for sheds would be conditional upon:

- a floor area threshold being set (given the perception of the demand for very large sheds in regional areas)
- appropriate referral triggers being in place (e.g. trigger for an environmental risk, such as storage of hazardous chemicals).

Theme 3: Biodiversity

Key opportunities and challenges

Many respondents perceived the protection of trees and vegetation to be synonymous with the protection of biodiversity. Many also referred to "successful" biodiversity being inextricably linked to climate change adaptability and sustainable water use.

Most respondents acknowledged the challenge of coordinating data from a wide range of different sources in order to inform relevant overlays within this theme, but still believed all mapping should be undertaken as part of the first generation of the Code.

Many respondents believed that without agreed benchmarks, measuring performance within this theme would be impossible. Some were concerned by the lack of an overriding state strategy related to biodiversity protection.

Respondents who commented on existing legislation related to significant trees were primarily concerned with not "watering down" current controls. Others sought clarification on whether such trees would be spatially mapped to help meet canopy targets and manage the impact of high urban heat islands on biodiversity.

Respondents also identified the challenges associated with:

- establishing the appropriate methodology to determine biodiversity benchmarks and identify significant biodiversity areas
- creating tools to measure the cumulative impacts of small-scale development over time, in order to inform future decision-making.

Ideas to enhance the current planning environment and biodiversity outcomes included:

- placing a greater emphasis on the value on trees and eliminate exemptions for tree removal for major projects
- using existing council resources such as Integrated Biodiversity Management Plans to generate interim mapping
- retaining established zones of a low-density character (e.g. Historic Conservation Areas and Residential Character Zones, which often feature large blocks with more trees that collectively function as a carbon sink)
- developing a green cover 'score' which could be applied to the calculation of public space or cultural inclusion levels (e.g. use of native Australian plants, signs in Indigenous languages as well as English)
- establishing state-led initiatives such as a backyard biodiversity program
- establishing best practices approaches to meeting canopy infill targets at the state government level
- improving integration between the planning system and existing Acts pertaining to Native Vegetation, Crown Lands and Environment Protection and Biodiversity Conservation
- placing a greater emphasis on wildlife in planning policies and the requirements for rezoning investigations.

A small number of respondents indicated that they would not support the proposed policy responses if they generated more "red tape and regulation".

Discussion questions

Can the Code protect biodiversity in modified landscapes and areas outside of native vegetation?

Many respondents agreed that biodiversity policy could include datasets that were not limited to native vegetation, and referred to "Green Adelaide" and its ambition to be the "most ecologically vibrant city in the world".

Ideas to protect biodiversity outside of native vegetation landscapes included:

- enhancing the Nature Links program, which responds to corridor and landscape biodiversity planning
- creating additional overlays such as a cultural landscape overlay or a natural character overlay
- building on council resources that recognise important areas of biodiversity

WHAT WE HAVE HEARD REPORT

NATURAL RESOURCES AND ENVIRONMENT POLICY DISCUSSION PAPER

Can planning policy assess the cumulative impact of development on biodiversity?

Many respondents felt that a mechanism to assess the cumulative impact of development on biodiversity was worthy of further investigation. However they also noted that implementing such a mechanism would be difficult due to the complexity inherent in defining 'biodiversity', which is not limited to flora and fauna.

It was suggested that a regional plan containing biodiversity targets and associated mapping may be able to measure development impacts over time, though it was also felt that this approach may not be equitable.

Can planning policy play a role in protecting and encouraging backyard biodiversity?

Many respondents supported the idea of promoting backyard biodiversity through the planning system and elevating biodiversity measures to the same level as GI and WSUD.

It was noted that for biodiversity measures to be successful, clear targets would need to be set and an appropriate monitoring system put in place.

Council responses referred to a number of planning system levers which could be used to elevate biodiversity, namely:

- the use of species lists where appropriate to encourage the planting of native vegetation
- the use of minimum requirements for soft landscaped areas, green spaces, tree canopies, etc
- the quantification of tree or green canopy value
- the incentivisation and expanded application of habitat corridors

Some respondents did not support further planning system intervention in backyards beyond the existing provisions for open space and the protection of significant trees, as prescribed in current Development Plans. These respondents referred to the inherent conflict between infill targets and subsequent impacts on backyard biodiversity.

Do we need a policy to protect and encourage development of roadside vegetation?

Most respondents supported a policy on roadside vegetation given the important role that roadside corridors had to play in connecting pockets of existing biodiversity in the public and private realm.

Some councils identified their own internal mechanisms for the identification and protection of roadside vegetation that could be used as a state-wide blueprint.

Some metropolitan councils suggested the approach may vary depending on the context of the roadside environment (e.g. highly impervious locations; infill locations where verge space is becoming increasingly limited; or locations where a limited range of trees are considered suitable or viable). This sector largely felt that a roadside policy should consider incentives for site amalgamation, vehicle access consolidation and the retention of street trees. Where this was not possible, policy should enable replacement trees to be planted where development cannot be designed around their retention.

Although many respondents noted that the Code provided the opportunity for developers to contribute to high quality street landscaping, they also expressed caution in the use of off-set schemes for tree planting in road reserves (e.g. this could compromise councils' own strategic targets). Other respondents suggested that greater allotment frontages and verge widths could be considered, and/or the creation of a landscape masterplan.

Other respondents referred to the Native Vegetation Council's (NVC) interim guidelines for the management of roadside remnant native vegetation, and suggested that these required further review in terms of the protection of biodiversity values.

Respondents also indicated that policies to protect areas of threatened vegetation could be included in the Code order to minimise incompatible development on adjacent private land. It was further suggested that such policies could encourage complementary planting to support the 'restoration' of threatened habitats in priority areas.

A small number of respondents did not support the protection and enhancement of roadside vegetation due to the perceived expense and increase in assessment timeframes and regulatory controls.

Theme 4: Coastal Environments

There was general agreement that the Code provided an opportunity to consolidate existing policy related to coastal environments as well as introduce better spatial information and a consistent approach to sea level rise and storm surges.

Some respondents were supportive of improved referral triggers to the Coast Protection Board (CPB) with associated clear overlay mapping. These respondents strongly supported the retention of referrals to the CPB.

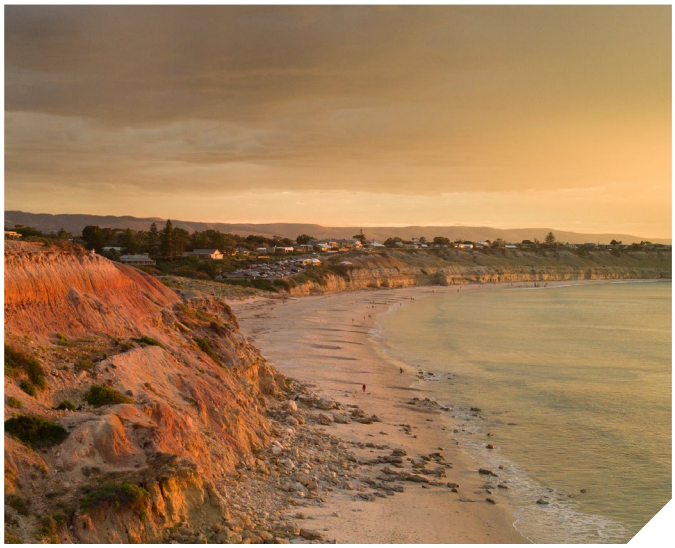
Key opportunities and challenges

To improve planning policy related to coastal environments, respondents suggested that:

- overlays could be designed to reflect different hazard classes, in order to better understand areas of high, medium and low risk
- the marine environment could be incorporated into policy on coastal environments
- Regional Climate Change Adaptation Plans could be reviewed for a more coordinated and collaborative response to climate change across all the regions
- tighter controls could be introduced on performance outcomes in Coastal Conservation Zones: this would enable more careful consideration of materiality, ground impacts and the appropriate use and shading of west-facing glazing

Key challenges identified include:

- the identification of 'accepted' forms of development and deemed-to-satisfy (DTS) criteria for coastal overlays and similar policy in the Code
- the formulation of a policy approach to coastal settlement areas that takes into account evidence-based projections for climate change, sea-level rise and other environmental risks
- the development of a consistent suite of spatial mapping tools that inform site levels and finished floor levels of buildings.



Discussion questions

What level of development (including accommodation) is appropriate for a Coastal Conservation Zone?

The question generated a wide range of responses, including:

- no changes are required
- blanket policies and restrictions are not effective in assessing impact in the context of location conditions
- small, low-scale tourism-related development is appropriate but dwellings are not
- small scale, low-impact development is appropriate for areas with existing access
- a limited level of nature-based tourism and eco-tourism (eco-huts/small footprint with a direct link to conservation)
- merit assessment of tourist development is appropriate on a case-by-case basis
- a multi-criteria approach is necessary to determine suitable land uses and/or level of development within an overlay area or Coastal Conservation Zone, rather than focusing primarily on climate change adaptation for coastal development.

A number of respondents specifically referred to the "Integrated Coastal Zone Management" (ICZM) process – an internationally recognised best practice approach to managing coastal issues as part of a framework involving all stakeholders – and suggested that this process would benefit planning outcomes along the South Australian coastline.

Does current planning policy adequately address at-risk coastal developments?

The majority of respondents suggested that current planning policy regarding coastal settlements that are at risk of sea level rise and storm surges was not adequate.

Respondents advocated for the creation of an evidence-based suite of planning policies that took into account future climate change impacts for coastal settlements.

Theme 5: Natural hazards

Key opportunities and challenges

The majority of respondents supported the proposed policy approach to natural hazards. However, the following components were highlighted by some as matters of importance:

- Existing bushfire and coastal hazard maps are outdated and inaccurately mapped.
- Development in areas of medium bushfire risk could be referred to the Country Fire Service.
- Existing bushfire policies could better deal with the conflicts between biodiversity protection and habitat clearance for bushfire mitigation.
- Not all councils have flood mapping or adequate hydrological assessments and require resource support.
- Flood data is critical to the new Code and should be addressed in its first iteration.
- Clarity on costs and funding sources associated with data collection and modelling is needed.
- Hazard policy should be clearly integrated with future projections for climate change.
- Area affected by extreme heat as a result of climate change may warrant their own hazard overlay – these areas could be determined by standardised heat mapping and vulnerability assessments.

The challenges identified by respondents were mostly concerned with the need for a consistent methodology for flood mapping and data collection generally; upfront risk identification to minimise risk exposure; and international best practice approaches to climate change impacts.

Many of the submissions identified one or more of the following opportunities:

- Hazard overlays could include classifications of low, medium and high risk for each hazard type.
- Many councils have resources and or spatial information that could be referenced in the Code.

Discussion questions

How can we better integrate council-owned flood data with the new Code and achieve consistency?

It was recognised by many respondents that existing council-owned information will need to be readily accessible to third parties, possibly through a shared mapping system or the data used in the development of an overlay.

Different methods and assumptions for flood mapping will need to be interpreted to derive a consistent 'development flood risk' relative to catchment characteristics (i.e. low depth, medium depth and high depth and or creek/water velocity proximity/impact).

What climate change projections should be used? What time-frame and emission scenarios should be considered?

Most respondents recommended adopting projections and timeframe scenarios that were recognised by experts in the climate change field.

Some suggested that the latest Intergovernmental Panel on Climate Change report should form the basis of climate change projections.

A number of respondents suggested it was not the role of planning system alone to address climate change, but that it played an important role in reducing some of the potential negative effects on communities.

Should flood risk categories be based on physical (depth and velocity) and function and isolation risk factors?

From the submissions that specifically responded to the question, a few respondents noted isolation and access considerations are unlikely to have been taken into account in most council prepared flood data, and usually can be addressed at the detailed assessment stage by a qualified hydrological engineer who can take local conditions into account. Some noted that flood hazard is generally quantified by flood depth and velocity in combination, but classifying the degree of hazard might require different approaches depending on the size of the site in question (where flood behaviour is relatively uniform across a small site, compared to significantly variability in the flood behaviour across the floodplain).

Most submissions responding to the question broadly indicated support for a risk based approach to hazard management for assessing development on hazard prone land to better protect people and property and/or indicated suggested specialist input is required. Other comments included that:

- the Code should refer to current best practice of *Australian Disaster Resilience Handbook* 7 (2017)
- the Code is an opportunity to develop a hierarchy of policies and associated policies based on mapping, data and risk assessment
- an auditing process should be established to review the methodology of existing flood mapping and establish a hierarchy of the most at risk flood areas with inadequate flood mapping (this process could establish a criteria to ensure appropriate data standards and where existing data meets this, it should be carried over into an overlay within the Code)
- where flood mapping has not been undertaken or there is uncertainty of the risk of flooding, a precautionary approach should be taken whereby development is performance assessed (i.e. not deemed to satisfy).

Theme 6: Environment protection and environment health

6.1 Site contamination

Key opportunities and challenges

Respondents generally supported the intended review and transition of SAPPL site contamination policies provided they have the same or greater level of protection.

Some of these respondents specifically highlighted the need for clear rules and procedures to be established so there is no ambiguity as to when an Environment Protection Agency (EPA) referral is required, which could be interpreted as bringing forward that element to the first generation of the Code.

Other specific issues or opportunities identified in individual responses include the following:

- policies should provide a trigger for when contamination investigations are required at the Development Assessment point and as an interim policy response, some submissions referred to support for the Adelaide City Council approach to site contamination
- an expectation that the Site Contamination Planning Framework (SCPF) will be implemented via the new regulations at the same time that Generation 1 of the Code is switched on
- a Practice Direction could be developed to assist with assessing contamination where a referral is not triggered
- several questioned how the Code might assist planners to identify (with a high level of certainty) that a parcel of land is potentially contaminated and how will it be managed in the process, will there be overlays identifying known sites?
- public health considerations should extend to the 'urban heat island' effect which can have exacerbated effects on ageing population and the disadvantaged, especially during heat waves and heat mapping can be used in overlays to guide policy and priorities for disadvantaged areas.

6.2 Interface (including noise and air emissions)

Key opportunities and challenges

Respondents generally supported the intended review and transition of SAPPL Interface module policies, and some additional related proposals including:

- the review and refinement of the SAPPL Interface module should include design solutions and performance outcomes should be utilised to effectively address interface issues in mixed use development areas
- the Air & Noise Emissions Overlay and policy module should be considered in the transition to the Code over all future zones that envisage mixed use development and in locations adjacent to arterial roads and fixed public transport lines and review of the adequacy of health management concerns (exposure to particulate matter) in this module

- consider requirement for certain activities associated with noise pollution to require development approval, (e.g. private trail bike circuits; any other like activity likely to become a regular occurrence)
- less emphasis on only rural and remote communities being exposed to hazards from a variety of activities (e.g. agriculture, intensive animal keeping etc.), as urban or peri-urban areas where population growth is faster and with increasingly higher densities, suggest the 'interface' matters should be addressed wherever dwellings and other land uses are in proximity to each other
- protection of communities from impacts may also mean prevention of development around existing industries and operations, not simply expressing the interface issue from a community (residential or sensitive receptor) perspective.

Discussion questions

Should cumulative noise impact assessments be undertaken as part of the development assessment process?

The question was responded to in a variety of ways:

- general agreement, however practical implementation of cumulative noise impact assessment will be more easily achieved on a development by development basis as opposed to area by area
- strategic planning (regional plans may be necessary to support this approach) and policy setting should examine cumulative or 'end state' development impacts of areas proposed for rezoning
- ambient noise impacts could be assessed cumulatively to establish a benchmark for sensitive development where proposed adjacent to existing noise generating activities and/or at the interface of a mixed use zone, provided any approach will not result in regulatory overburden for applicants
- some councils specifically identified City of Adelaide interface noise and air emissions detailed policies as worthy of consideration for using in the Code
- if supported, the Minister's Code should be expanded beyond focusing on specific interface scenarios to include a much broader range (e.g. residential and commercial; residential and light industry).

A few respondents indicated it was too problematic and should not be used, it will impact the success of many applications and impact on affordability.

How can policy effectively address the interface between land uses in zones promoting mixed land uses? For example, a coffee roaster adjacent to a residential development in the urban corridor.

The question was responded to in a variety of ways:

- performance assessment for most development at interface locations, with a comprehensive suite of policy considerations relating to a range of factors (noise, air quality, heat island factors, major roads and adjacency issues);
- administrative procedures regarding appropriate public notification and designation of scale and thresholds beyond which triggers a Restricted Development Category under the Code; separation distances remain an important tool in the Code
- setting acceptable parameters for noise levels, operating hours and waste management collection will contribute to an effective interface management strategy for mixed use development. However, any approach should be reasonable in its application and not result in regulatory overburden for applicants
- Industry should not be located in an Urban Corridor Zone
- No need for change beyond what is already regulated

WHAT WE HAVE HEARD REPORT

NATURAL RESOURCES AND ENVIRONMENT POLICY DISCUSSION PAPER

Other feedback

Respondents offered additional feedback outside of the specific themes of the discussion paper, and these comments are summarised below:

- Current planning reforms should be considered in the context of the State Public Health Plan, the Open Space Contribution Scheme and other, concurrent environmental reforms taking place in South Australia.
- More detailed information is needed on how the Code will achieve improved environmental outcomes and support the state's environmental targets.
- Significant environmental values should be co-created with Australia's First Peoples and indigenous perspectives on natural resource management should be considered.
- The planning system should collect data on the loss of horticultural and agricultural land due to urban encroachment.

Next steps

Submissions received by the State Planning Commission during the consultation period have been processed according to theme and will be used to inform policy related to natural resources and the environment in the Planning and Design Code (the Code).

Feedback received will also be used to develop subsequent generations of the Code.