

**Stakeholder Engagement on a (draft)
*South Australian Multiple Land Use
Framework* – ‘What we heard’ report**

8 April 2016



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1 Executive summary

The 'What we heard' report has been prepared to summarise and synthesise the submissions received during stakeholder engagement on a (draft) *South Australian Multiple Land Use Framework*.

The South Australian Government recognised the benefit of pursuing a state-wide multiple land use framework through a whole of government process and a cross-agency Reference Group consisting of 13 state government agencies was formed. Between April and October 2015, the Group developed a (draft) *South Australian Multiple Land Use Framework*.

Engagement

The Framework was released for stakeholder engagement on 12 November 2015; engagement ended on 18 December 2015¹.

The Reference Group identified 214 stakeholder groups and the Framework was forwarded to a total of 390 individuals. Stakeholders groups included:

- Aboriginal community groups and organisations
- Community and environmental groups and organisations
- Government agencies and councils (local, state and Commonwealth)
- Members of Parliament
- Business and industry groups
- Agricultural peak bodies and groups
- Regional development authorities
- Emergency Services

Analysis of submissions

Comments on a (draft) *South Australian Multiple Land Use Framework* were diverse. Specific comments on the Framework are outlined in section 5 – 5.9 of this report. Comments on general themes are identified in sections 6.1 – 6.19 of this report. A selection of stakeholder comments relating to each theme have been included in the report (all identifying attributes have been removed from these comments).

In total, 58 submissions were received either through the yourSAy website² or by mail or email. Of these submissions, 29 submissions (50%) supported a *South Australian Multiple Land Use Framework* and 20 submissions (34.5%) opposed a *South Australian Multiple Land Use Framework*. Nine

¹ Note - 11 individuals/organisations sought and were offered time extensions to lodge their submissions in the New Year.

² The discussion page on the yourSAy web page received a total of 35 comments and responses from 12 contributors.

submissions (15.5%) were also received that discussed specific topics but they were unclear whether they supported or opposed a *South Australian Multiple Land Use Framework*. Further analysis of submissions is provided in sections 4, 5 - 5.9 and 6.1 - 6.19 of this report.

Next steps

Following the completion of the 'what we heard' report, a separate report will now be prepared. This report will address (where appropriate) the key questions and concerns raised by individuals and organisations in their submissions.

At the same time, the Reference Group will work through the recommendations provided in the 58 submissions received, liaise with stakeholders if clarification is required and make relevant changes to a *South Australian Multiple Land Use Framework*. Cabinet will be asked to consider and endorse a *South Australian Multiple Land Use Framework*.

Should Cabinet approve a *South Australian Multiple Land Use Framework*, the Framework will then be made publically available and decision makers and stakeholders will be encouraged to consider the guiding principles and key engagement mechanisms for land use and land use change projects.

2 Introduction

South Australia has long been a pioneer of multiple and sequential land use outcomes across a variety of land uses, including our multiple use regional reserves and marine park systems and success in opening the Woomera Prohibited Area. For many of these differing land uses, access to land is critical to South Australia's long-term sustainability and international competitiveness.

A (draft) *South Australian Multiple Land Use Framework* is the culmination of targeted consultation with key South Australian Government land use regulators on the National Multiple Land Use Framework. However, the South Australian Government recognised the benefit of pursuing a state-wide multiple land use framework through a whole of government process. In March 2015, Cabinet approved a whole of government approach and a cross-agency Reference Group, consisting of 13 state government agencies³ was formed. Between April and October 2015, the Group developed a *South Australian Multiple Land Use Framework*; Cabinet approval was sought to engage with stakeholders between 12 November and 18 December 2015.

3 Stakeholder engagement

On 12 November 2015, the South Australian Government released a (draft) *South Australian Multiple Land Use Framework* for stakeholder engagement. The Reference Group had identified 214 stakeholder groups and the Framework was forwarded to a total of 390 individuals. Stakeholders groups included:

- Aboriginal community groups and organisations
- Community and environmental groups and organisations
- Government agencies and councils (local, state and Commonwealth)
- Members of Parliament
- Business and industry groups
- Agricultural peak bodies and groups
- Regional development authorities
- Emergency Services

Eight presentations were delivered on a (draft) *South Australian Multiple Land Use Framework*, in which a number of representatives from local government, state government, Aboriginal groups, agricultural peak bodies, environmental groups, regional development bodies, business and industry were present.

During engagement, 18 phone enquiries were made and 11 individuals/organisations sought and were offered time extensions to lodge their submissions.

³ Attorney General's Department, Defence SA, Department of Environment, Water and Natural Resources, Department of Planning, Transport and Infrastructure, Department of the Premier and Cabinet, Department of Primary Industries and Regions, Department of State Development (Aboriginal Affairs), Department of State Development (Minerals and Petroleum), Department of Treasury and Finance, Environment Protection Authority (SA), Renewal SA, South Australian Tourism Commission and SA Water.

4 Analysis of submissions

In total, 58 submissions were received either through the yourSAy website⁴ or by mail or email. Of the 58 submissions received:

- 20 were from individuals, of which five individuals identified themselves as farmers, two as landowners and four as members of a community protection alliance (it is possible the remaining individuals were also farmers, landowners and/or members of the community protection alliance but this was not identified in the submissions)
- seven were from local councils
- five were from agricultural bodies/groups
- five were from state government departments and boards
- four were from conservation and land management organisations
- four were from Aboriginal Corporations, Councils or representatives of First Nations
- three were from mining companies
- three were from industry bodies/organisations
- two were from community lobby/action groups
- two were from State MPs
- two were from Commonwealth government agencies
- one was from a tourism council

29 submissions (50%) supported a *South Australian Multiple Land Use Framework* and 20 submissions (34.5%) opposed a *South Australian Multiple Land Use Framework*. Nine submissions (15.5%) were also received that discussed specific topics but they were unclear whether they supported or opposed a *South Australian Multiple Land Use Framework*.

Of the 29 submission that supported a *South Australian Multiple Land Use Framework*, 18 recommended changes to the Framework.

Of the 20 submissions that opposed a *South Australian Multiple Land Use Framework*, nine supported what one would call a 'partial multiple land use concept' (i.e. support for agriculture and related activities, wind and solar but not mining or petroleum activities) and an additional submission was supportive of nuclear power and solar energy but not 'new technologies', the construction of wind turbines, the use of gas guns to scare birds or the irrigation of inappropriate crops for the region '24 hours/day'. Seven of the 20 submissions that opposed a *South Australian Multiple Land Use Framework* recommended changes to the Framework.

12 of the submissions opposing a *South Australian Multiple Land Use Framework* related specifically to fracture stimulation operations (fracking)⁵ in the South East⁶ and of these, six submissions were

⁴ The discussion page on the yourSAy web page received a total of 35 comments and responses from 13 contributors (including the SA Multiple Land Use Framework team).

supportive of wind and solar and one was supportive of complementary industries relating to agriculture. Two of the submissions opposing a *South Australian Multiple Land Use Framework* related specifically to mining on the Yorke and Eyre Peninsulas and of these, one was supportive of wind and solar.

14 submissions recommended that agricultural land should be protected and more support provided, while nine submissions recommended increasing 'red' and/or 'green tape' or amending legislation to favour agricultural interests.

Eight submissions were of the opinion that a *South Australian Multiple Land Use Framework* was being prepared to improve land access for mining and petroleum ventures.

Five of the submissions were opposed to multiple use parks and reserves, while five of the submissions supported the current multiple use parks and reserves model.

Three submissions were of the opinion that a *South Australian Multiple Land Use Framework* and engagement was a waste of time.

5 *A South Australian Multiple Land Use Framework*

5.1 General comments

29 submissions supported a *South Australian Multiple Land Use Framework* and 20 opposed a *South Australian Multiple Land Use Framework*. Nine submissions were also received that discussed specific topics but it was unclear whether they supported or opposed a *South Australian Multiple Land Use Framework*.

Of the 29 submission that supported a *South Australian Multiple Land Use Framework*, 18 submissions recommended changes to the Framework for further clarity and a selection of these comments are provided in sections 5.1 – 5.9 and sections 6.8 and 6.19 of this report.

Of the 20 submissions that opposed a *South Australian Multiple Land Use Framework*, seven of these submissions also provided specific comments on the Framework. A selection of these comments are provided below and in sections 5.1 - 5.9 of this report (all identifying attributes have been removed from these comments).

⁵ Eight individuals who opposed a *South Australian Multiple Land Use Framework* also presented written and/or oral submissions to the recent Parliamentary Inquiry into Unconventional Gas (Fracking).

⁶ There are currently no proposals before the state government for the approval of unconventional oil and gas development (in particular fracking in the South East).

'Firstly, we applaud the state government for seeking to recognise and genuinely consider the interests of all relevant stakeholders, provide opportunities for stakeholders to engage early, and for decision-making processes to be transparent and allow for equitable consideration. We also appreciate the framework's 'guiding principles' and 'key engagement mechanisms' as they will provide practicable support to agencies as they consider initiatives affecting multiple land users.'

'_____ supports the continuation of the very successful multiple land use approach which has been in existence within SA (and indeed in all States) since Federation.'

'After reviewing the document we believe that the framework is helpful in that it provides a clear understanding of the State Government's position on multiple land use and comprehensively articulates their guiding principles for ease of reference by industry. Importantly, it also provides community groups and other stakeholders certainty that their involvement and interests will be welcomed and heard.'

'_____ considers that the intent of this Framework is sound, needed and is capable of providing greater certainty and more effective land use into the future. It could also be a vehicle to assist in creating resilience in our always challenging and now changing climatic conditions.'

'Provided the policy it is managed effectively and properly; the multiple land use policy will create transparency from all levels.'

'The document would benefit from better explanation of 'land use' and 'multiple land use', clearer direction regarding its role and application and supporting technical guides to provide the detail for practitioners who will be obliged to consider it.'

'It is suggested that the Multiple Land Use Framework would be best suited to major projects and development of a significant / regional scale where integrated land uses are proposed and the potential for land use conflict is high.'

'The document would benefit from better explanation of 'land use' and 'multiple land use', clearer direction regarding its role and application and supporting technical guides to provide the detail for practitioners who will be obliged to consider it.'

'_____ has reviewed the MLUF and provide the following comments:

- *In addition to economic development, further emphasis could be given to environmental and social considerations.*
- *Consideration could be given to the inclusion of Ecologically Sustainable Development (ESD) as a guiding principle; to better align with best practice principles.'*

'We agree that any incoming activity needs to be cognizant of the existing land use (and landholder) so the incoming party has certain responsibilities (such as to inform, make good, and conduct activities (where possible) in sympathy with the existing land use activities.'

'Recognising, acknowledging and respecting the interests of other interested land users is a fundamental premise of the framework but this principle also needs to make clear that equal weighting is given to all

legitimate land uses. There should also be some acknowledgement that there are some areas where multiple land use is inappropriate due to their unique species assemblages, conservation significance, primary production or heritage value.'

'Whilst the principles and components supposedly will not alter existing land rights assigned under Crown land, freehold, native title and pastoral leases; the fact that such a biased framework exists and is endorsed by State Cabinet may influence the way in which rights and obligations related to land tenure are imposed on users by the State Government now and into the future.'

'Invoking the principles of multiple land use to justify the acquisition of agricultural land against the wishes of the farmers who own that land is likely to lead to greater not less conflict between mining and agriculture. No amount of leading practice engagement or compensation is going to change the opposition of 'threatened' farmers and any proposal to force landowners off their land will only heighten their resistance.'

'The process of resolving land use conflict is unfair and unequitable and simply, in my opinion, unrealistic and unachievable. Multiple land users clearly have different needs and goals, which are not possible to be equally achieved on the same piece of land either simultaneously or sequentially.'

5.2 Premier's message

Five submissions provided comments on the Premier's message. A selection of stakeholder comments are provided below:

'Whilst sustainability is addressed in the Premier's introduction ("The smart and environmentally sustainable use of land is vital to our State's long-term prosperity") it is not a key theme in the document. We recommend it is added as a guiding principle.'

'We thank you for the opportunity to comment on the "South Australian Multiple Land Use Framework" and support the Premier's assertion "that all interested people, communities and organisations deserve a say in how land is used, that cooperation is vital, and that clear and accountable decision-making processes benefit the common good."

'The message from the Premier begins very well with the words 'smart and environmentally sustainable use of land is vital to our State's long-term prosperity'. However I am unsure this document will deliver this as I believe his economic priority 1 and 2 are totally at odds with each other. With his priority I wonder for whom it is 'the best place to do business.'

'The Premier's opening comment (page 2) - "...smart and environmentally sustainable use of land is vital to our State's long-term prosperity" - is fully supported by _____. However, the key issue is how the Government will interpret the terms 'smart 'and environmentally sustainable'. Unquestioning adherence to the principle that multiple land use is the best way to achieve long-term prosperity in all circumstances is dangerous.'

5.3 Our vision

11 submissions provided comments on 'Our vision'. A selection of stakeholder comments are provided below:

'It is good and essential that the involvement of the community from the start and throughout a multiple land use discussion is a feature of the framework – giving effect to the Premier's Better Together Strategy. It has the effect of engaging the community in a positive way, rather than an oppositional way, which is almost an inevitable response to announce and defend approaches.'

'It is understood that the purpose of the Framework is to provide high level guidance principles of land use change with respect to community and stakeholder engagement and managing land use conflict / multiple land uses. While that notion is generally supported, care needs to be taken to ensure that the Framework does not complicate or conflict with the planning system – the primary driver for assessing development, including changes in the use of land.'

'The vision for the framework should include the need to balance the needs of the economy with the long-term management of our natural resources.'

'Decision-making processes are transparent and allow for equitable consideration of land use proposals - Not only do I need to see true transparency, not just words on paper again, but the integrity of decision makers and the quality of independent baseline data processes. That means government regulations and expectations have to be much stricter so these companies pay for the independent studies necessary to get proper data. The data needs to be detailed.'

'I see the vision statement regarding consultation as meaningless. An opportunity to be engaged is not the same as a legal requirement.'

5.4 Desired outcome

Nine submissions provided comments on the 'Desired outcome'. A selection of stakeholder comments are provided below:

'In reading the "Desired Outcomes" it appears that there is a huge challenge to move from where we are to the situation spelt out by those outcomes.'

'Similarly, the "desired outcome" should be to maximise benefits to South Australians in a manner that ensures our natural resources can be sustained into the future.'

'These are definitely not my desired outcomes. My desired outcome (1) would be: to use the Precautionary Principle, the Principle of Intergenerational Equity and the Conservation of Biological Diversity and Ecological Integrity to collaboratively plan and develop land use outcomes so we care for the environment for long term sustainability to ensure food and water security for the community. My desired outcome (2) would be that land use is positive and sustainable to create healthy communities for present and future generations.'

'You state that the desired outcome of this Multiple Land Use Framework is to "encourage the view generally that multiple land use is desirable, positive and in the best interests of SA and its people." Are we to become another of your examples, like the Gawler Ranges National Park where mineral and petroleum activities are to be allowed. This is scandalous. In Australia "National Park" has become meaningless. Maybe "prime agricultural land" will be next.'

5.5 Guiding principles

22 submissions provided comments on the 'Guiding principles'. A selection of stakeholder comments on the guiding principles are provided below and comments relating to specific guiding principles are provided in sections 5.5.1 – 5.5.6 of this report:

' _____ believes the concept of "Whole of landscape approach" is missing and that it is critical to include. It sees that society, environment and economy are inextricably intertwined, with each relying on the other. In the same way, land, water, biodiversity and people are interconnected, meaning that the action on or by one of these are likely to have an effect on another immediately or manifesting into the long term.'

'In addition to economic development, further emphasis could be given to environmental and social considerations.'

'In addition to economic development, further emphasis could be given to environmental and social considerations. Consideration could be given to the inclusion of Ecologically Sustainable Development as a guiding principle; to better align with best practice principles. Consideration should be given to the Regional Natural Resources Management Plans and Water Allocation Plans to ensure the framework is consistent with these Plans.'

'It may be beneficial for the guiding principles to highlight the need to consider whether proposed changes in use require interface buffers to mitigate against impacts to or from adjoining uses. The need for interface buffers could be incorporated into considerations under principles relating to accountability, co-existence and equity.'

'Leading practice principles need to apply. Definitely support early engagement and transparent decision making processes.'

5.5.1 Accountability

A selection of stakeholder comments are provided below:

'In an effort to create a stream-lined process it is imperative that accountability is not compromised.'

"Accountability" needs to be expanded to incorporate more than just the decision-making process. Proponents of land use change need to provide clear and concise information on the social, cultural, economic and environmental changes that will occur as a result of the land use change. This will both add to the value of the engagement process, as well as form a basis for future monitoring and compliance to ensure accountability.'

5.5.2 Best use of assets

A selection of stakeholder comments are provided below:

'This principle needs further clarification about how competing land uses will be evaluated in terms of their benefits. For example the benefits of the natural environment to our health and wellbeing and supporting ecosystem services (i.e soil and catchment protection) is becoming increasingly evident yet is not properly valued or accounted for in an economic sense. There are also significant benefits to agriculture and horticulture from native insects and birds that pollinate crops and control agricultural pests and the provision of these ecosystem services needs to be better considered in terms of their economic value.'

'The 'Multiple Land Use' meaning uses the term 'maximise the benefits for all South Australians'. That's a good idea if you recognise that food and water security (the basics of life) comes above any other activity. However, I believe it has missed the point as once again the local regional community is not considered first before 'all South Australians'.'

'I don't believe multiple land use leads to maximum benefits for current and future generations of people. What is the point of this statement? Is it to make the best of a bad situation? Or is it to truly provide the maximum benefit for the land user as opposed to just maximise the benefit?'

5.5.3 Co-existence

A selection of stakeholder comments are provided below:

'There are many land uses which can and do co-exist side by side, and in some cases several activities co-exist, in country South Australia, such as hospitality, tourism, viticulture, horticulture, agriculture, animal breeding and grazing, cropping, vegetable farms, flower farms, free range eggs, dairy, fishing, wind farms, and solar farms. These activities can happily co-exist and increase the productivity of the landholder, which in turn supports other stakeholders in the community as well as employment.'

'The ____ experience suggests that it will be the successful pre-existing industry (farming) that will be required to move aside for, and acknowledge and respect the other industry (mining) seeking access to the land.'

'The need for interface buffers could be incorporated into considerations under principles relating to accountability, co-existence and equity.'

'I believe it needs to be very clear that to co-exist we do not pollute our environment. eg. This needs to ensure that any primary producer, who wishes to produce organic food can without anyone compromising that ability.'

'My opinion is that co- existence is not possible. I don't believe that multiple land use is desirable or in the best interest of South Australians. For example my garden cannot grow vegetables and flowers in the same place at the same time. Similarly it cannot be used as a swimming pool and a garden in the

same place simultaneously or even sequentially. Mineral and Petroleum exploration and extraction excludes all other uses. For example, I am not able to go bushwalking in the land where the Leigh Creek open cut coal mine lies.'

5.5.4 Efficient processes

A selection of stakeholder comments are provided below:

'Although we support the need for efficient processes and a rigorous, scientifically based risk assessment process we do not support the general intent of this principle to reduce red-tape and allow for fast-tracking of projects that will have long-term and potentially irreversible impacts on natural resources.'

'Where it states "Streamline processes to remove unnecessary red-tape and duplication." This is almost a motherhood statement as everybody would agree with those sentiments but it has to be remembered that one person's red-tape is another person's accountability. Accountability must not be compromised.'

5.5.5 Evidence based

A selection of stakeholder comments are provided below:

' _____ approach with its engagement is to always use information that is based on proven science.'

'On page five another guiding principle is "Evidence based" which goes on to state "Provide mechanisms and opportunities for community, businesses, industry and government to identify and share information to identify potential issues and opportunities for multiple and sequential land use outcomes." The obvious uncertainty here is what happens when conflicting information is presented as has already occurred? The logical response is that we default to the pre-cautionary principle.'

5.5.6 Equity

A selection of stakeholder comments are provided below:

'We also recommend this principle incorporate the concept of inter-generational equity that is a fundamental principle of ecological sustainable development.'

'I don't believe there is or can be a shared or equal commitment by the government to multiple or sequential land use.'

5.6 Figure (collaborative multiple land use outcomes)

Two submissions provided recommendations to substantially change the diagram to focus on different aspects of land access, environment and ecology. Stakeholder comments are provided below:

' _____ considers the diagrammatic representation of the framework, as prepared by Sinclair Knight Merz, in the SCER document to be far more useful than the simplified circle diagram on page six of the SAMLUF. _____ suggests that the Reference Group reviews schematic of the framework in the final South Australian document.'

'We recommend:

- *That the diagram on Page 6 of the Framework document be amended to recognise these principles as follows:*
 - o *At the centre insert a circle titled 'environment & ecology'*
 - o *Outside this but still within the existing centre area, a circle encircling the addition above titled sustainability and resilience*
 - o *The existing words 'collaborative multiple land use outcomes' the become the outer ring of the centre circle*
 - o *Add into the groups named in the outer circle 'conservation groups''*

5.7 Key engagement mechanisms

Eight submissions provided comments on the 'Key engagement mechanisms'. A selection of stakeholder comments are provided below:

'We welcome the Key Engagement Mechanisms outlined on page 7, in particular, to ensure the use of risk based approached based on best available science, evidence and sustainable development principles.'

'We support a rigorous, scientifically valid risk assessment process, but note at this time risk is generally considered in a once-off, ad-hoc nature for each individual case of land use change, rather than considering cumulative risk across landscapes. We also contend that risk should be assessed as a function of both likelihood and consequence.'

'Based on our experience the engagement mechanisms proposed are workable and would add value for all stakeholders. In addition, the mechanisms could consider the following additions:

- *Encourage consideration of shared benefits and the long term plans for a property, including whether infrastructure for one activity (for example, roads and associated infrastructure constructed for petroleum operations) can be designed and located for the benefit of other parties, such as farmers or landowners;*
- *Consider flexibility of each party's operations and activities in order to maximise coexistence. For example, whether drilling can be relocated to minimise interruption with farming activities.'*

5.8 Glossary (definitions)

Seven submissions suggested amending existing definitions in the Framework or to incorporate additional definitions. A selection of stakeholder comments are provided below:

'So what is the definition for the phrase "key stakeholder"?''

'The definition of Sustainable is incorrect. There is no reference to the fact that the land needs to be preserved and not harmed for future generations.'

‘Consider expanding the definition of land to include "airspace" above the land so that the interests of the Airport and airfields can be considered: including aircraft safety areas, and protecting runway approach and air traffic control site lines.’

‘We propose the following (for use purely within the Framework as noted, also noting that these terms have other meanings outside the Framework).

- *Environment. The entirety of information relating to the land under consideration – physical, climatic, natural and as a result of human intervention.*
- *Ecology. All the fauna and flora that depend on or contribute to the health and well-being of the land under consideration*
- *Resilience. The capacity of the land under consideration to remain in or regain its state of health and well-being following the proposed additional use.’*

‘Clearer definitions of the roles and responsibilities of the co-management board (as the entity that manages the National Parks) and ____ (as the holder of native title rights over the National Parks and surrounding areas).’

5.9 Case studies

Seven submissions disagreed with some or all of the case studies provided, while seven submissions either supported the case studies or recommended that further information is provided to better demonstrate how the Framework will operate. A selection of stakeholder comments are provided below:

‘Whilst we support the inclusion of case studies, the information provided for each of these studies is very limited, and as such they do little to support how the Framework relates to each of the case studies. We suggest that further information is provided on each of the case studies, potentially through the inclusion of a web link to a more complete synopsis, that could, for example, show how these case studies have addressed the guiding principles.’

‘Whilst case studies have been provided where all parties can agree one needs to be mindful where this may not be the case. There will be those occasions where there is conflict with the land use because of multiple uses.’

‘It would be more beneficial to include case study examples which focuses specifically on competing demands between the resources and agricultural sector and the multiple land use issues faced between these two sectors, as it is currently an area of key concern. The development of the Hillgrove Resources Kanmantoo Copper Mine is one such example of how multiple land use issues have been mitigated between a resources company and farmers.’

‘I object to using these examples (case studies) and I don't find them at all reassuring. The Woomera Prohibited Area is a Prohibited Area so how can it be used by multiple users? Military use is very different to mining use. Mining by definition means destruction. Maralinga Nuclear test site has been permanently

destroyed by nuclear testing and remains contaminated by radiation, so this is an example of failed sequential and multiple land use.'

'Wind Farms and open cut mines cannot be compared as they are very different. When you no longer want a wind farm the turbines can be removed as can the concrete base pad.'

'Spencer gulf : To allow any risk to our fisheries, fishing industries, ecosystems and recreational needs by allowing mineral and/or oil exploration in the Spencer Gulf is negligent on behalf of the government.'

6 General comment themes

Comments on a *South Australian Multiple Land Use Framework* covered a diverse range of topics and themes. General themes have been identified in sections 6.1 – 6.19 of this report and a selection of stakeholder comments are provided in each section (all identifying attributes have been removed from these comments).

6.1 Who are stakeholders?

Eight submissions were of the opinion that the definition of stakeholders should be broadened to incorporate anybody who may be affected by a development. A selection of stakeholder comments are provided below:

'All people who can be potentially affected are stakeholders who need to be consulted, not just the land owner on whose property the development is taking place.'

'So for unconventional gas extraction in the South East, the key stakeholders are all people who obtain water from the aquifers, which is the entire population of the region.'

6.2 Engagement and timing of engagement

Eight submissions expressed concerns regarding the timing and length of the engagement process. A selection of stakeholder comments are provided below:

'The process still leaves a lot to be answered for and I feel doesn't have the best interest of SA's agricultural land at heart. Firstly the timing and haste of the engagement process during November - December one of the states busiest periods in agriculture, especially for SA's great grain industry. Secondly the length of time of the engagement process doesn't seem long enough for what is such an important issue.'

'We don't just want an opportunity to be engaged as I am doing now for this submission 'in November-December 2015'. There is nothing respectful about the time frame in this present submission writing process.'

'I have read the South Australian Multiple Land Use Framework, though in a bit of a hurry, since the letter advising us of our right to have a say, written on Nov. 12 reached our secretary on Dec. 14, giving us only 4 days to contact our members and to respond.'

6.3 Views on co-existence of mining and agriculture

15 submissions expressed views on the co-existence of mining and agriculture. A selection of stakeholder comments are provided below:

'We believe multiple land use as a concept is possible where the objectives for the land are clearly established and the mix of land uses is appropriate and well managed with a serious and meaningful engagement of all interests.'

'_____ agree that there is a range of issues affecting multiple and sequential land use in particularly community engagement and adjoining land use conflicts, ___ agree that the proposed framework is a solution to further clarify the direction for the broader community, investors and developers.'

'Both _____ and _____ are managed according to detailed management plans that provide for a gradual return of ecological integrity while allowing for carefully managed multiple uses. They are excellent examples of multiple use in practice without loss of focus on the overall conservation objective.'

'On _____ and _____, the range of managed uses includes, conservation restoration, nature based tourism and 4WD tourism, wildlife research, international geo-tourism, overseas university field studies, resource exploration and possible future mining, indigenous cultural activities including youth training programmes, resource industry environmental officer workshops, community volunteer training, feral animal and pest plant eradication, dingo control, assisting local land-owners with scientific advice and making water available to neighbours.'

'With resources exploration, _____ has been happy to engage with the industry to assist with accommodation and access and to establish an agreed protocol of environmental care while using the property. In return, the company is aware of the conservation programmes on the property and will assist with appropriate infrastructure projects.'

'There is a limited availability of land to provide for a wide range of important uses including agriculture, pastoral, natural beauty, access to resources, recreation and conservation. There will, however, be other situations where one land use has a predominant call on the land in question and a conflict situation may arise. The key matter here is the process by which complex multiple land use decisions are to be made and particularly the valuation of competing land uses which may have non-monetary asset values.'

'_____ supports the general concept of multiple land use and applies that concept in its own large arid land reserves. It believes, however, that multiple land use is not suitable for all lands and needs to be determined on a case by case basis.'

'Landholders already use your meaning of sequential land use to manage their properties effectively. However, I don't support sequential land use if that means invasive mining and gas drilling companies are allowed into our regions that are our foodbowls or water catchment areas or have precious aquifers.'

'Agriculture already encompasses multiple land use with most farms growing a variety of different crops and livestock enterprises – if that's not multiple and sustainable land use for the benefits of all South Australians, then what is?'

'There is no law in South Australia or Australia, constitutional or otherwise that would preclude responsible development in the public interest. The reason being, the Crown that is the overall community, and South Australia is the owner of the mineral rights including oil and gas, not an individual landowner. Therefore as the owner of those rights, the Crown reserves the right to ensure the general public interest is in no way disadvantaged through vexatious and unreasonable demands from some sectors of the community.'

'The debate about right of entry and different industries coexisting within the same proximity is becoming a more significant subject since there are many unverified claims and outright misinformation about the incompatibility of different industries (and land use) within the same locality, particularly with the use of scare campaigns connected to impacts on environment (water, aquifers, air quality, dust, chemicals etc) that will then lead to a loss of amenity and/or product (and property) value for the incumbent landholder.'

'There are many examples historically within SA of multiple (and not necessarily competing) industries coexisting quite successfully, such as oil & gas operations in the South East of SA (Katnook gas plant and gas wells and pipelines to the gas plant) co existing with local farms and agriculture, so much so there has not been an issue since gas production commenced in the SE of SA decades ago.'

'A further example is the extensive oil & gas operations in the Cooper Basin coexisting with cattle stations which have gained and retain organic certification for their beef.'

'The upsurge of debate in the Eastern States about unconventional gas, as well as the development of CSG in Qld and NSW, and in the SE of SA has seen all sorts of spurious claims from activists designed to increase the resistance to fossil fuel developments (gas and coal) by the farming community, on the back of scare tactics and the logical extension of this tactic to resist the right of entry for all mining activities.'

'I am not against progress, the limestone coast region is already such a diverse region with many different industries co existing such as cropping, beef, wool, fat lambs, dairy, wine, cray fishing, wind power, tourism, forestry and all the associated service provides that support these industries. These industries occur together because they support each other. Other activities such as gas extraction cannot co-exist with these activities without being detrimental to them.'

'There are already many multiple uses of the land in the Limestone Coast region including livestock production, many varieties of field crop production, vineyards, orchards, dairy, fishing and aquaculture, and tourism. These all depend on the aquifer as do our town supplies. They depend on clean air and soil to keep our very respected 'clean and green' environment to produce for national and international markets. Tourists do not want to holiday in a gasfield.'

'A alternative and more balanced approach would be for the Government to acknowledge that the growing conflict between agriculture and miners cannot be resolved by forcing the unachievable goal of co-existence onto farmers to the ultimate detriment of what is and will continue to be the State's most important industry.'

'In our opinion farming and mining cannot co-exist. This also includes aquaculture. The tourist industry is also affected by damage to the environment caused by exploration and mining.'

6.4 Multiple land use in parks and reserves

Five submissions were against multiple land use in parks (specifically against exploration and mining) while five submissions supported the current multiple use parks and reserves model. A selection of stakeholder comments are provided below:

'In addition, ____ considers that it would be beneficial if it is consulted during co-management approval processes about matters relating to National Parks that will also affect land outside of National Parks which ____ holds native title rights over. If these are dealt with as separate approval processes it adds to the complexity of the approvals process for third parties wishing to advance proposals within the National Parks.'

'Multiple land use has been very successful. All parks should be opened up to mining access. Any moves to reduce access should be resisted strongly.'

'Although multiple land use can be acceptable and useful in some circumstances it should never be permitted in National Parks and the like. Conservation reserves such as National Parks, Conservation Parks, Marine Parks, etc. are for the purposes of conservation, not exploitation. Some areas must be and always remain as no go areas for commercial exploitative purposes.'

6.5 South East concerns

12 of the submissions related specifically to fracture stimulation in the South East⁷ and possible impacts to aquifers, property values, tourism, employment, insurance, amenity, occupational health and safety, ability to farm, health of stock and the national vendor declaration as well as the efficacy of legislation and the government agencies that manage them. Six of the submissions relating to South East concerns were also presented at the recent Parliamentary Inquiry into Unconventional Gas (Fracking). A selection of stakeholder comments are provided below:

'Employment overall in the South East is better than the state average and employment opportunities continue to grow in tourism, agriculture, aquaculture, viticulture, transport, manufacturing. Therefore, to welcome the gas industry to the South East as an employer is not a requirement in this region of growing employment. In fact, gas mining in the South East would have the opposite effect. It would

⁷ There are currently no proposals before the state government for the approval of unconventional oil and gas development (in particular fracking in the South East).

affect the profitability of many of our current industries and therefore create declining employment in many industries.'

'The very possible potential adverse effects of invasive mining and unconventional gas on the landscape of the South East of South Australia are of great concern to many of us living and making a living in the region.'

'The quality of our air and excessive light and noise from unconventional gas and invasive mining exploration and production would impact on tourism and the liveability of our region for humans, livestock and wildlife. The air quality could be affected by flaring, chemical waste ponds and the heavy vehicle traffic.'

'If other land use like invasive mining (coal) or conventional and unconventional gas (shale, tight gas, coal seam gas) activities are undertaken concurrently with agricultural activities on prime agricultural land the size and scale of the farming operation will be negatively compromised. This could have a flow on affect to rural communities with social and economic implications.'

'Mining – gas 'fracking' threat to water, peace (noise pollution and traffic) and to beauty with areas of unsightly drilling. This does not mean we are against mining but certain potentially damaging technology. Also there should be royalties granted to landowners when conventional mining is proposed with various safeguards as to the mining companies being able to enter and mine when the landowner is against this.'

'When a landscape is industrialised for profit the environment and humans suffer.'

'Petroleum companies have provided funds for updating some sporting facilities in some towns in the South East. These practices should be made illegal. While sporting clubs may wish to take advantage of the company donation this creates further stress in the community through division. For instance, Penola Bowling Club received \$25,000 to upgrade their facilities.'

6.6 Environmental concerns

In conjunction with concerns raised in relation to fracking (see section 5.4 above), an additional nine submissions raised other environmental concerns. A selection of stakeholder comments are provided below:

'Whilst use of land is be useful and beneficial to various stakeholders, at the same time our land, environment and quality of life for inhabitants is fragile and care must be taken to ensure that the correct balance is maintained.'

'We must remember that the environment both natural and farmed, once damaged, will take a very long time (if ever) to recover.'

'Irrigators which water 24/7 creating likely threat to aquifers and causing noise pollution. Water greedy crops should be grown during the wetter season – winter into spring, not summer, or should be grown elsewhere in warmer, wetter areas.'

6.7 Aboriginal community representatives concerns

Five submissions related specifically to Aboriginal community representative concerns. A selection of stakeholder comments are provided below:

'_____ supports the statement in the Framework that consultation about land use decisions will occur early and respectfully, which is critical to discussions with the Aboriginal community. Early and respectful consultation means that issues can be identified at the beginning of a project rather than at the end, as frequently occurs at present, and which can result in the Aboriginal community being characterized as 'blockers' and anti-development. Early consultation will promote collaboration and the development of innovative land use solutions.'

'Australian law denies our legal identities as sovereign peoples and continues as though we have ceded or agreed to the invasion of our lands. Neither has occurred.'

'A claim of fair dealings with all parties cannot be made without the acknowledgement of First Nations sovereignties and the minimum international legal standards which should be applied. The context of such an application should centre First Nations epistemologies and ontologies and not be limited by neo-liberal frameworks. To do otherwise is to continue an injustice to First Nations.'

'Real free, prior and informed consent processes require time and resources and it is recommended that a proper process take number one priority over a quick one-stop shop approach.'

'This proposed new framework will impact upon the future survival of First Nations Peoples.'

'Without the authority to say no and to veto destructive developments on our lands there is no possibility of co-existence with First Nations, beyond our assimilation.'

6.8 Land ownership, farmers and farming

Eight submissions provided recommendations that land ownership, farmers and farming should be acknowledged. A selection of stakeholder comments are provided below:

'This Multiple Land Use Framework disappointingly ignores land ownership rights, where other Australians are not impacted.'

'We would welcome the Framework been a lot more balanced between land users, and more recognition of the property rights as they exist.'

'We have no difficulties with what happens on, or how decisions are made, or who makes those decisions on land not owned or leased by farmers. That is as long as these decisions do not impinge on the "right to farm" of abutting landowners.'

'Underlying the framework seems to be a desire to increase the number of people who can, as a matter of right, come onto a property whether the landowner is agreeable or not. This raises matters that not only impinge on privacy and on the laws of trespass but also the issue of biosecurity risk and the long-term consequences of a breach occurring.'

'If outside parties wish to be part of the decision-making process regarding land usage they can only do so if they obtain equity in that land. They should not be able to demand the status of "stakeholder" and then be entitled to the same rights as the lawful landowner.'

'We would expect the "right-to-farm" and protection of agricultural land would be at the pinnacle of any land use framework.'

'Multiple land use is neither a desirable nor a positive outcome for freehold landowners of farmland whose only desire is to continue farming.'

6.9 Climate change, protecting clean green image and growing food for the world

Nine submissions mentioned the need to protect our state's 'clean green image', eight submissions highlighted the importance of growing food for the world and eight submissions discussed how climate change will impact our ability to grow food and protect our way of life. A selection of stakeholder comments are provided below:

'We have multiple land use already and need to continue to manage it to stay 'clean and green' and to maintain our water supply in a very dry era.'

'You say "It is recognised that managing differing interests in land use...can be improved to adapt to our evolving economy and global challenges. Our biggest global challenge is lowering global warming and our greenhouse gas emissions. That means increasing gasfields is not on.'

'Given that world population is set to excide 10 billion by 2050, Quality farmland and clean water are only going to become more scares. We need both these resources if we are to feed the growing world population. So little of our state is considered arable farmland it should be given priority status and protected from invasive mining and gas fields.'

'We would like you to explain how the community, businesses, the mining industry and the government have the right to "develop multiple and sequential land use options" for land that is already owned and operated by a farmer engaged in the sustainable production of food to feed this nation and the world? Where are the farmers and landowners rights and equity in this "shared commitment"?'

'There will be no getting over food from other countries if our food bowls are ruined. More powerful countries than Australia have already staked their claim. Not enough water to spare in South East for new industries.'

'With regards to Water and Food Security, SA is the driest state in Australia, and Australia is the driest inhabited continent on the planet. SA needs to be supporting land use based upon this looming crisis, and ensuring that the limited agricultural land in SA is protected along with aquifers necessary to support food production.'

'Please protect Agricultural land so Australia has the ability to feed the world.'

'Climate change and global population growth make it even more vital to protect our premium food producing areas. There are 98.4 million hectares of land within South Australia. Of this, 4.2 million hectares is used for agriculture. The ability to be able to protect this land for future production is a priority for ____.'

'Everyone now knows that clean water and unpolluted land for growing food are going to become desperately important as climate change takes its toll and populations rise in places with arable land. I do not want to have to get my food from China.'

6.10 Concerns about impacts on agriculture

14 submissions raised concerns about ongoing and possible further impacts to agriculture. A selection of stakeholder comments are provided below:

'Farming communities are the lifeblood for the city. Eyre Peninsula, York Peninsula, South East and other areas across the state are united in vehemently opposing destruction of their farmland. The government must be called to account, and protect our precious farmland and environment before it is too late.'

'In 2011 - 12 the Australian rural sector exported almost 40 billion worth of produce, but in Australian dollar terms this reduced by 18.9 billion, a 47 percent decrease in export income to the rural sector because of the high exchange rate attributable to the mining boom.'

'The idea of further growth of the mining industry will benefit Australia is misunderstood. How can that be, as I understand 83% of mining companies are foreign owned, where does the bulk of the money go, not to Australia.'

'In SA we are fortunate to have good water management systems in place and water allocation plans to prevent aquifer drainage. The Mining and Petroleum and Geothermal Acts should absolutely fall under the Water and Natural Resources Act and Regulations to ensure Water and Food Security well into the future in SA.'

'More focus should be placed on South Australia's unique position and promote strongly and assist the existing businesses such as tourism, viticulture, fishing, grazing and agriculture to truly gain the premium food and wine "clean green" reputation without the impediment of the indecorous reputation of the mining industry being implanted amongst our food bowl.'

6.11 Concerns about buffer zones and impacts to existing land use

Three submissions raised concerns about buffer zones for new developments and their impact to existing land use. A selection of stakeholder comments are provided below:

'The 'right to farm' has been an issue for a number of years, especially with the significant increases in horticultural production over the last 10 years, and particularly vineyard expansion.'

'Compatability of land use in many regions not necessarily primary industry versus industrial or residential but real issues with agriculture versus viticulture or horticulture and no bufferages in place.'

'Broadacre farmers in primary production zones are under pressure from encroachment by the other competing land uses such as urban sprawl, vineyards, horticultural diversifications etc.'

'There is clear favouritism to the expansion and advancement of other land use options, in particular viticulture and tourism, at the direct expense of the existing industry (broadacre farming).'

'We should allow common sense to prevail and let the application be assessed on its contribution to the local economy rather than whether it offends someone's view of visual amenity.'

'There appears to be inequity in this planning process, where farmers are required to accommodate vineyards, while vineyards are not required to accommodate farming.'

'The need to buffer against new sensitive land uses reduces the amount of land that farmers can use for productive farming.'

6.12 Concerns about mental health

Nine submissions raised concerns about mental health in the agricultural community. A selection of stakeholder comments are provided below:

'Many groups of people such as the mentally impaired, poorly educated, financially disadvantaged, unemployed or people such as farmers who may be facing recovery from exceptional circumstances such as drought, flood and the like – these groups need systems to protect their ability to get a fair outcome.'

'I have counselled many farmers from depression to attempted and actual suicide in rural society and some of this has been from what I would see as a direct result of govt. procedure through what we see as unfair legislation and regulation with complex court systems and outcomes.'

6.13 View that agricultural land should be protected

14 submissions were of the opinion that agricultural land should be protected and more support provided to the agricultural community. A selection of stakeholder comments are provided below:

'SA has only 4.2 million hectares of agricultural land out of 98 million hectares. How about adding land protection as well to a good engagement on land use and land use change in South Australia.'

'I believe, in the 4.6% area, the question of land conflict can never be resolved. Farmers, vignerons and other agricultural industry want to have the right to use their land as they have for generations, and not put their agricultural industry at risk.'

'Our agricultural land represents such a small proportion of the nation's total available landmass; there should be suitable sites meeting essential and desirable criteria for storage and which do not impact the nation's food security and in particular SA Premium Food and Wine strategy's clean green image, one the SA government and primary producers have worked so hard and invested so much in - particularly in recent times with trade missions to China.'

6.14 Legislation and regulation

Nine submissions recommended increasing 'red' and/or 'green tape' or amending legislation to favour agricultural interests. A selection of stakeholder comments are provided below:

'Although we support the general intent of the draft Framework, we strongly believe that without legislative change and further broadening of the scope of the document that it will not achieve the desired outcomes of environmentally sustainable land use and long-term protection of our precious natural resources.'

'Any proposed framework must have new regulations to ensure that it operates in the best possible manner. Otherwise what is the point of having the framework. If there are no new regulations and no new laws protecting the rights of farmers or communities then a Multiple Land Use Framework is worthless.'

'There have been mistakes made, but they will not be cured by a change in balance "of power", but rather better process, regulation, compliance, consultation and information.'

'I am opposed to Multiple Land Use, and I firmly believe that current regulations need to be updated and made equitable for all land users.'

'Existing legislative making processes are not the best when they do not look after the people of the community.'

'I believe it is unconstitutional that the farmers and landowners only own only the top few centimetres of soil. I believe that there needs to be a complete overhaul of the South Australian legislation in regards to farmers' and landholders' rights, so that there is an equal playing field.'

'Most importantly, the existing legislations need to be amended and upgraded as they are not strict enough to protect our precious farmland and aquifers.'

'Community Consultation needs to be enshrined in law for low impact and improved for Medium and High impact activities. I believe regulations are essential and I don't support a reduction in red tape.'

6.15 Compensation

Seven submissions noted that compensation was totally inadequate for changes to land use or that no amount of compensation was appropriate. A selection of stakeholder comments are provided below:

'In most cases, as I understand, people don't want to be compensated, they just want to be left alone to get on with farming life, without the interruptions and hazards of the resources industries.'

'Compensation is not the way to go – the fact is simple – our agricultural land and water must be preserved and not shared with Petroleum and Gas Industries. We can't eat minerals, drink gas or polluted water.'

'Compensation to landholders is often inadequate, even if the monetary compensation is above market value this does not account for the loss of future income the farming business would have supplied, the loss of a profession, or the displacement from a home and a community.'

'If the state and community want to force broad acre farms to remain when viability and farm management damage will be on going major financial incentives need to be given on a permanent basis or that significant that wealth created will negate damage.'

6.16 Renewables and nuclear

Eight submissions were supportive of solar power generation, six submissions supported wind power generation and one submission was against wind turbines altogether. Two submissions were against nuclear power or related uranium mining and one submission was supportive of nuclear power generation. A selection of stakeholder comments are provided below:

'Wind Turbines destroying natural, attractive surroundings. Moving blades rotating and seen from a great distance. Distracting for drivers. There is more and more evidence pointing to possible health hazards which is well documented. Overall a very intrusive and environmentally dubious means of getting relatively small amounts of power.'

'Solar should be developed for individuals and public buildings with further research into the development of solar plants. Impact of either of these on the landscape would be considerably less than with wind turbines with, we believe, greater overall benefit.'

'Multiple land use in this region (SE) may be better suited to more renewable energy investments such as solar and wind rather than invasive mining and unconventional gas which is very unlikely to help the sustainability of the area or be compatible with the existing industries of the region.'

'Wind farms and solar farms can coexist with the agricultural industry but not with the mining industry.'

'Please do not allow Land in SA to be used for a nuclear waste dump and Please follow the Aboriginal Principles of 'Irtati Wanti' and 'Leave the Poison in the Ground' by supporting a STOP to uranium and other 'poisonous' mining.'

'Modern nuclear power stations have so many fail safe systems and produce so much energy in a relatively small area, using small amounts of fuel, that it is hard to see any argument against the concept. They do need large amount of unprocessed rock for fuel extraction and considerable water supply for cooling but siting of plant can be away from most other land users and recycling of the water can be built into the plant.'

6.17 Questioning the science and independence of committees

Five submissions raised concerns about the validity of best available science and the independence of government departments or committees. A selection of stakeholder comments are provided below:

'The use of the term 'best available science' really concerns me. Who is paying the scientist? Are they truly independent? How well is their scientific research conducted?'

'Best available science' is an interesting phrase. I believe that it is easy to be deceived by so-called scientific evidence. It often depends on who has financed the research. It depends how the scientific report was set up, who has done it and for what purpose, and whether all facts have been made evident. Much can be left unsaid and problems may be swept under the carpet rather than acknowledged. What is the real truth? It needs to be independently researched ie. no conflicts of interest. When independent science is available it needs to be used, not ignored.'

'Community acceptance does not mean just the local councils, or community consultative groups that are established. The independence of these groups should be questioned.'

6.18 The precautionary principle

Four submissions recommended that the precautionary principle be incorporated into multiple land use activities. A selection of stakeholder comments are provided below:

'The onus of proof is on the proponent to prove the development is safe so when credible conflicting evidence is presented then the default position is the pre-cautionary principle.'

'We need to ensure state regional planning processes are caring for the environment & health of the people. The Precautionary Principle is so important.'

'We need independent baseline data prior to any development. The precautionary principle is essential to make wise decisions for the citizens of SA.'

6.19 Interaction with planning processes

Seven submissions recommended that the framework demonstrate how it will relate and interact with current planning processes. A selection of stakeholder comments are provided below:

'In general the proposal to establish a Multiple Land Use Framework is supported. It is suggested however that careful consideration is needed to ensure that the Framework does not conflict with the existing and proposed planning and development assessment system.'

'Planning reform, following the expert panel, is likely to lead to significant beneficial change for our state. Recommended is that the relationship between the framework and planning reform be included in the final document.'

'I can see how the proposal may consistent with state regional planning processes. However, I fail to understand how and where the Framework will fit into the Planning system.'

7 Next steps

The recommendations from the engagement process will greatly assist in the editing of this important body of work and we thank you for taking the effort to provide your thoughts on a *South Australian Multiple Land Use Framework*.

With the completion of the 'What we heard' report, a separate report will now be prepared. This report will address (where appropriate) the key questions and concerns raised by individuals and organisations in their submissions.

At the same time, the Reference Group will work through the comments and recommendations provided in the 58 submissions received, liaise with stakeholders if clarification is required and make relevant changes to a *South Australian Multiple Land Use Framework*.

Once the Reference Group has completed the integration of comments from submissions and liaison with stakeholders, Cabinet will be asked to consider and endorse a *South Australian Multiple Land Use Framework*. Should Cabinet approve a *South Australian Multiple Land Use Framework*, the Framework will then be made publically available and decision makers and stakeholders will be encouraged to consider the guiding principles and key engagement mechanisms for land use and land use change projects.