



**Conservation Council
of South Australia Inc**

Comments on the Mount Lofty Ranges Watershed Wineries and Ancillary Development Ministerial PAR July 2006

(please read with our submission to the PAR).

This PAR fails to ensure the protection of economic and environmental sustainability, regional biodiversity and water quality.

Although the expansion of wineries may bring benefits to a limited number of primary producers it is likely to negatively impact on the 'right to farm' of those who do not choose to become involved in the wine industry. It will also impact on tourism as a unique destination.

The CCSA strongly opposes this expansion for the following reasons:

The PAR encourages activity that has the potential to have serious consequences to water quality in Priority Area 1 of the watershed

- The watershed of the MLR significantly contributes to the water supply of metropolitan Adelaide and is absolutely inappropriate for increased development.
- The industry uses large amounts of water, produces considerable quantities of waste water and has the potential to be highly polluting.
- Even one serious chemical or waste spill can have serious consequences 'sufficient to adversely affect aquatic ecosystems and water used for agriculture, recreation/amenity and domestic use' that could 'take months or years to fully recover' (Winery PAR, p.18).

Orderly and economic development is inadequately addressed in the PAR.

- The assumption that the expansion and new investment in the wine industry will be economically viable or sustainable ignores both recent experience (new players having to leave their grapes on the vine and likely requests of financial help from Government) and the impacts of climate change and rising transport costs on the industry and attendant tourism.
- The consequences of failed enterprises and abandoned buildings in Watershed Priority 1 where planning controls allow only one dwelling per title raises concerns.

Community rights to influence the future character of the MLR have been removed.

- In almost all cases the PAR changes categorisation from Non-complying, Cat 3 to either Complying or Merit, and Cat 1 or 2 depriving local communities of access to the Courts to appeal a decision.

The PAR is predicated on 100% compliance to arrive at 'acceptable' levels of risk

- The PAR relies on adherence to specified conditions and the application of these conditions by Development Assessment Panels and the Development Assessment Commission.
- Most councils either do not have a compliance officer or have only a part time officer who is already over worked.
- The EPA is under funded and is only required to monitor wineries with a crush of over 500 tons.
- Dams set up to catch spills from wineries and other industries frequently fill with sediment and once filled they will fail to prevent spills flowing into waterways - who will regularly and frequently check for compliance?

The PAR assumes only 1 in 10 year storm events and climatic wet years

- Threats are increased during larger flood events — there were two 100 year flood events in Kersbrook towards the end of 2005.
- Does the PAR address climate change effects on rainfall patterns and distribution?

The PAR does not address the protection of indigenous flora and fauna

- It is common knowledge that the Native Vegetation Act gives inadequate protection on small landholdings or for roadside native vegetation.

Conclusion

It is unrealistic to trust that conditions tied to development approval will protect the watersheds of the MLR. Conditions for development within the PAR need to be firmly applied and frequently checked for compliance.

It is folly to expect planning conditions will be able to control this inappropriate industry (and ancillary developments) within the watersheds of the MRL

Peter Cullen, international water expert, warned in 2004 that the quantity and quality of Adelaide's water is at risk due to failures to plan and manage these catchments effectively and advised there should be no further development in the MLR. We would be wise to accept this advice.

The PAR will not prevent pollution by wineries and ancillary development of catchments across the MLR.

We urge your Committee to carefully consider the future impacts that this PAR brings to the Mount Lofty Ranges.

CONTACT

Jasemin Rose
Chair, CCSA Planning Working Group
120 Wakefield St ADELAIDE SA 5000
Ph: (08) 8223 5155 Fax: (08) 8232 4782