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DPTI Planning Reform Engagement Team
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Dear Sir/Madam,

Productive Economy Discussion Paper – City of Playford Comments

Thank you for the opportunity to comment on the Productive Economy Discussion Paper. The following comments are based on a report that was endorsed by Council’s Strategic Planning Committee.

The Productive Economy Discussion paper is a well-researched and prepared paper that presents a broad range of issues in a relatively clear manner. The Paper provides a good picture of the main features of the South Australian economy, changes currently underway and likely to develop in the economy and some potential responses in regard to the planning system. The depth in analysis with research by Deloitte and SGS Economics and Planning is particularly noted.

It is acknowledged that the planning system, amongst a significant range of factors, is an important component in maintaining a sound State economy which responds to global and local influences. While generally supportive of the initiatives and matters raised in the paper, comment has been made on a range of issues with a particular focus on those issues that have a direct relevance for the City of Playford. These matters include employment lands/industrial areas, activity centres, and the Virginia horticultural area. Particular comment is also made in regard to metropolitan growth management. It is also noted that the Paper ventures into discussion of matters that go beyond the Planning and Design Code and will be influenced by other ‘levers’ within the planning system such as legislation and administration.

The overall direction provided early in the Paper is also supported: ‘in an increasingly globalised marketplace for jobs, services, investment and knowledge we seek to create a planning system with the capacity to respond to change and opportunity, and to enhance prosperity of our cities and regions, while protecting those valuable aspects that make South Australia a unique place to live’. Of particular note is the need to protect valuable assets such as the livability of metropolitan Adelaide while maintaining a productive economy and the difficulty in establishing an appropriate balance between these objectives.

While the People and Neighbourhoods Discussion Paper will be likely to deal with these issues in more detail, it is noted that the quality of medium / high density housing development, urban renewal and the particular need for adequate and well located open space with increasing densities are important issues requiring attention.
Support is provided for two directions to achieve the objectives indicated by the paper which are:

- The intention, already expressed though the current planning system, to protect our food bowl (a significant area of which is in Playford around Virginia), natural assets and picturesque landscapes.

- Introduce new policies that embrace change, new industries and technologies to grow cities, towns and regions. This includes employment areas that are flexible and located close to housing and activity centres supported by infrastructure and appropriate transport services.

These are important policy directions which are supported in general for Playford, given the projected growth and urban renewal that will take place for the foreseeable future.

A range of competitive advantages have been identified in the paper for the State, where there is potential to provide SA with the opportunity to capitalise on economic growth in the future. Those identified where Playford already has a foothold and where the paper suggests a need to continue to focus on ongoing opportunities include: Agribusiness and value-adding; Defence industries; Health and medical industries. Others mentioned for the State include International education, energy and resources, tourism and visitor attraction, professional information and technology services. Some of these also offer potential for development by Playford. It is noted that flexibility is required in the planning system and awareness of these potential opportunities when making planning policy/zoning decisions.

The Paper has identified a range of elements which the planning system has a role in and can be modified over time to assist responsiveness to economic changes. These include:

- **Managing potential conflicts.** It is agreed that managing potential conflicts is a necessary aspect of planning systems, and will continue to be, and that advances in technology mean that there is now greater scope to manage land use impacts without always resorting to separation of activities to the same extent as in the past. This enables modification of planning policies and zoning to provide greater flexibility where external impacts of industries can now be better managed. It is however noted that there may be potential for increased flexibility to create an increased workload for local government (particularly under the relatively new Local Nuisance and Litter Control Act, 2016) through a tendency for greater nuisance to be generated at interfaces between uses which traditionally would have been separated or not allowed to establish in certain areas. Increased policy flexibility will also in some cases require increased attention at the development assessment stage which will not always result in streamlined decision making as more challenging and complex development applications are managed by the planning system.

- **Creating and reinforcing opportunities and innovations.** The paper suggests several ways in which planning can support industry. These include ensuring sufficient land supply for their expansion and managing the incursion of incompatible land uses (wine regions are given as an example, but the horticultural industry is equally relevant in a Playford context). It is indicated that urban infrastructure needs to be provided in an intelligent way to support the economy including for residential neighbourhoods. This is where there needs to be a particular focus from the State to improve processes so that future growth processes do not face the same difficulties as faced by Playford in managing infrastructure development (see further discussion below). Innovation precincts and clusters are highlighted as an area where planning can facilitate economic development and the benefits of this are supported and have been identified for the Playford Health Precinct (formed around the Lyell McEwin Hospital) and Elizabeth Regional Centre (Northern CBD).
Metropolitan Growth Management

A very significant policy area for Playford discussed is metropolitan growth management. It is also noted that a policy conversation area in the Paper seeks response to questions about facilitation of economic activity and provision of adequate employment lands. As indicated previously, Playford can offer substantial first-hand experience in this regard, with major areas currently being developed, following the rezoning of land by the Minister for Planning several years ago. A number of points can be made:

- Playford’s experience is that where there is significant fragmentation of land (many separate allotments) over large areas the system of setting-up deeds is very costly and resource intensive and does not achieve the best results. If there is to be continued rezoning of areas such as these, the process needs to be substantially upgraded and simplified. The new legislation allows for establishment of infrastructure schemes and there is a need for a trial in a growth area such as Playford. As a general comment Playford’s experience and observation of large scale developments over many years is that the best large scale residential development is often undertaken where facilitated through Renewal SA (or the equivalent State agency) initial ownership, or joint ventures with Renewal SA and sale to private developers under appropriate conditions.

- Greater effort should go into a establishing a fine-grained, sophisticated approach to rezoning of land and infrastructure coordination when it is necessary for such large land areas to be set aside for development to provide a long term supply of land. When planning for such significant population growth and at densities which in many cases are above those in many existing outer metropolitan suburbs, greater care needs to be taken in early planning stages. With such large areas identified at a strategic planning (30 Year Plan) level for long term land supply (particularly residential land), there was the potential for progressive / staged rezoning without any significant implications for land supply either in Playford or the region. The issues with infrastructure coordination that Playford has unreasonably been burdened with could have been reduced.

- There is a need for a greater level of ‘tactical’ and financial support at a State level and a whole of government approach including the ability to influence infrastructure providers such as SA Water and SA Power Networks, while working in conjunction/collaboration with Councils. It is particularly noted that there have been significant issues with SA Water provision of sewer mains in the Angle Vale area through lack of adequate forward planning. The Greater Edinburgh Parks (GEP) land to the west and north of the RAAF Base Edinburgh requiring future trunk stormwater drainage investment is a case where major infrastructure provision/coordination and investment has been left to Playford. GEP comprises approximately 1500 hectares of land identified in the 30 Year Plan as strategic employment land (providing for the Region and beyond) with implications for ongoing supply of employment lands for the State.

- The need for greater levels of State tactical support is also highly desirable to reap the full economic potential of areas such as the Playford Health Precinct and Playford CBD (Elizabeth Regional Centre), both of which have regional catchments and implications well beyond the boundaries of the City of Playford.

- There are ongoing concerns about water security and reliability of electricity supply in an environment where there are increasing demands being placed on these resources.
Activity Centres

Playford acknowledges the important role that activity centres play in urban development and providing comprehensive and convenient services to the community, and supports the continuation of a hierarchy. Centres enable both government and the private sector to invest in a more certain environment. For example major transport routes and public transport can be more readily planned and accessed around centres. Government and local government services and offices such as police, courts, libraries, Medicare and Services SA (to name a few) can be conveniently provided and their location provides support for retail/shopping functions of a centre. Centres also offer potential for advantages in facilitating the clustering impacts on economic outputs as usefully discussed in the Paper.

The following comment is also provided:

- Particularly in growth areas there is a need to ensure that new residential areas are provided with new retail, commercial and community/government facilities that are well distributed, conveniently located and that they are highly accessible by private and public transport as well as walking and cycling. This requires significant effort to go into the pattern of distribution and location which cannot be undertaken with market mechanisms alone.

- There is a need to preserve opportunities, such as presented by Elizabeth Regional Centre to create genuine, vibrant CBDs outside of the Adelaide CBD in order to properly serve a Greater Metropolitan area which extends such long distances to the north and south.

- Playford acknowledges that there is the need to guard against or at least minimise potential anticompetitive issues, such as centres dominated by single land ownership which can reduce the ability to encourage start-up businesses and the inability to expand centres where appropriate at the edge for example. It is noted that the Suburban Neighbourhood Zone enables consideration of expansion of centres or potentially new centres where appropriate justification can be provided. It should also be noted that there remains the need for guidance in the initial pattern of development of centres.

- The paper seeks specific comment about enabling residential development in activity centres. There is not a simple / single answer to this. Residential development can be appropriate where there is land available that is unlikely to be developed for typical centre activities, and in larger centres where there is land available and potential to improve the activation / vibrancy of a centre without disadvantaging the primary function of a centre. Mixed use development such as where apartments are established over commercial or retail development is desirable, but not always attractive to the market outside of the Adelaide CBD.

- Support is provided for further work to be undertaken by the Government (as suggested by the paper) on defining those activities and features of centres which are most important in the formation and sustaining of successful centres and also regarding how competition is encouraged while supporting centres.

Primary Production / horticulture

Primary Production and in particular horticulture is significant to Council given the importance of the Virginia horticulture district. It is not clear from the paper what approach will be taken to horticultural policy in establishing the Code.
There have been discussions with the State to encourage additional work on policies applying to the Virginia District, and further approaches may be necessary to encourage appropriate action. Horticulture is substantially different to other forms of primary production, particularly in terms of land division requirements and use of greenhouses which requires a different policy response. Horticulture and agribusiness is noted as an area of competitive advantage for the State. However, figure 4 in the paper may mislead in terms of the importance of horticulture as it is not a major export industry and therefore does not show up in the pie-chart, but it does contribute substantially to the State GDP. The State Government through the Department of Primary Industries and Regions SA (PIRSA) is coordinating an Integrated Management Framework for the horticulture districts in Adelaide Plains and Playford Councils which is a very good example of how the State can contribute tactically to help drive economic (and other) outcomes for geographic areas of strategic importance.

The Paper raises specific questions about establishing buffers between rural and residential development and in particular whether a buffer less than 40 metres can be justified. This is to guard against issues such as aerial spraying, noise and dust. An appropriate response would be to have a 40 metre buffer as the default distance, with any lesser distances to be performance assessed (considered on merit with appropriate justification).

A further specific question is raised seeking views regarding the potential for unused farm houses to be placed on separate land titles enabling adaptive reuse. The major and genuine concern with this is the potential for use as rural living if the desired new economic activity is unsuccessful. The concerns, particularly related to horticultural areas is about interface issues where there is potential for spraying, dust and noisy activities – basically these areas need to be considered as industrial style farm production areas rather than pleasant rural settings. The issue needs to be handled with caution.

Other matters

The discussion of tourism signs is noted and whether there is a need for third-party advertising which is remote from the site of a tourism venue, for example along arterial roads on the approach to townships. Third party advertising has generally not been supported by the planning system for various different forms of development including tourism, particularly on arterial roads. The approach to this issue has been generally to establish the standard brown tourism signs rather than allowing individual premises to each advertise individually away from their own sites which would result in a proliferation of signs. A suggested approach would be to comprehensively review the approach to the standard tourism signs and determine whether there is scope to enable a more innovative approach which could, for example, enlarge the signs, make them more appealing and/or increase their content.

Comment is also sought by the paper about whether undeveloped strategic mineral resources should be identified and protected from urban encroachment and incompatible development. The suggested response to this is that strategic resources should be protected in general. However, there is a need to ensure in the decision making process that there is comprehensive assessment of the potential impacts on any existing nearby development of extraction of the resource and whether these can be satisfactorily overcome.

The Paper seeks specific comment about encouraging a more flexible approach to enable a wider range of land uses in employment zones. Generally this is considered appropriate provided the general intent of a zone is not undermined and sufficient mechanisms are available to avoid interface issues with new activities. As noted above that this will require greater reliance on development assessment, rather than policy responses. It is considered that the response to height and setback of buildings, particularly within the core of employment zones can be flexible.
Setbacks of buildings can often be unattractive because landscaping is not maintained, and therefore smaller setbacks, usually allowing for visitor parking, can be appropriate.

The Paper indicates that the 'home activity' provisions of regulations and planning policy which enable low key employment activities to be conducted from home are to be reviewed and transitioned to the new code. It is noted that these provisions have operated successfully for many years and while review is supported there should be caution in making substantial adjustments, given that the desire for high levels of livability is a key aspect of the Paper (in part to attract skilled employment to Adelaide and other areas).

Summary/Conclusion

The Productive Economy Discussion Paper is supported while comment has been provided on some specific issues and areas, particularly where comment has been sought. The paper highlights the need for a nuanced approach to planning policy in many different issues and the challenges of supporting livability while enabling flexibility for economic development.

Of particular interest to Playford is the need for improvements in metropolitan growth management with tactical and financial support provided by the State, as discussed above, for projects or areas of strategic significance such as Greater Edinburgh Parks. Support is offered for the role of activity centres while acknowledging the need to guard against anticompetitive concerns. The horticulture industry and particularly intensive horticulture requires the early preparation of specific policies to support ongoing development.

In conclusion, the broad range of policy issues that are being dealt with through the introduction the Planning and Design Code suggests that there has been a build-up of these matters over a long period of time and that reform is now being funneled into the new Code. There is a need for substantial ongoing research and development as a part of 'business as usual' in order to adequately maintain the planning system including maintaining and developing a productive economy.

Thank you once again for the opportunity to comment on this discussion paper.

Yours faithfully,

Glenn Docherty
MAYOR