The Eastern Region Alliance

The Eastern Region Alliance (ERA) is a group of eastern Adelaide metropolitan councils who voluntarily work together for the benefit of their local communities and the eastern region community as a whole. Currently the ERA consists of the Cities of Burnside, Campbelltown, Norwood, Payneham & St Peters, Prospect, Unley and the Town of Walkerville. A Business and Economic Development Portfolio Group of ERA was formed to help promote the region and develop regional strategies for economic growth.

The ERAs vision around economic development is to:

*Foster economic development through regional advocacy, business support, and promotion that stimulates growth in visitors, jobs, investment and businesses across the Eastern region.*

The ERA region is an economic powerhouse with developing industries, growing employment and output.

Boasting a $10b economy, with over 100,000 jobs, and nearly 30,000 registered businesses, the ERA region is a significant economy with its own challenges and opportunities in the future.

The new code seeks to simplify the current planning system to better facilitate the economic development and growth objectives of the State by removing unnecessary ‘red tape’ for businesses, developers and investors, while balancing social and environmental needs and those of the broader communities.

Employment prospects, effective business and services clusters, diverse residential offerings and innovative and flexible environments underpin strong, vibrant communities. This aligns and supports the overarching objectives of the ERA, which seeks to develop vibrant communities across the region with strong economic development and investment attraction facilitating diversity and economic prosperity.

Theme 1 – Supporting and growing key industries

This theme seeks to support and grow ‘key’ industries. It is recommended that growth policy be developed for each of the areas where the State has a key competitive advantage not just primary industries, tourism, mining and exploration (as is suggested on pages 26-27).

There is a need to acknowledge SA’s high proportion of SME’s and their role and importance to the local economy, in addition to focusing on industries as a whole or catering policy to larger retailers.

The emphasis on services industries as a growing proportion of our economy is understood, however there must be a diversity of industries to be sustainable in the long run.

Land use zoning and related policy can protect and reserve land for particular purposes, however market and demand is the primary driver of growth.
Metropolitan Growth Management

- How could a more coordinated metropolitan staging program be achieved which provides greater certainty to all stakeholders and assists more orderly development? P28

Investors and business seek clarity, opportunity and security when planning future investment and development. Local communities seek balance between social and environmental concerns, including the preservation of local character and heritage, and economic benefits of new investment and development. Councils seek to achieve an acceptable balance between economic development and investment attraction to continue growth and prosperity in region with efficient and sustainable land use to provide for vibrant and growing communities and greater local employment. The State’s infrastructure planning and economic development imperatives and potential must also be supported to ensure a productive economy continues to grow and develop.

All relevant stakeholders within these interest groups need to be engaged upfront to ensure that there is robust discussion which aligns the policy content of the planning and development system with all stakeholder interests. This early and ongoing engagement should see a coordinated approach from the outset and tie in stakeholder interest with the economic drivers of our desired productive economy, helping to manage potential conflicts and encourage zoning and planning controls that provide balance and greater certainty to future planning. This is supported by the combination of land supply initiatives through both the extensive rezoning of residential broadhectare land and the series of major infill development projects we have seen in recent years.

It is essential that a future metropolitan staging program is based on the demonstrated and predicted needs of the region, provides a co-ordinated and staged ‘roll-out’ of development and services, and for the stages to be clearly articulated within the regional plan. Importantly, there should also be a clear set of criteria for what constitutes ‘suitably located’ land as relevant to the intended land use(s).

Centres Policy and Retail Investment

- What policy approaches or other levers could be used to help ensure South Australia's retailing sector is competitive, well-located and provides ample opportunity for new entrants to the market? P37

While it is noted, that there is a strong nexus between centres policy and urban consolidation, it is also worth noting the date that shows most retail spending still occurs outside of centres. While continuing to recognise existing centres, expansion at ‘edge of centre’ locations and the development of new activity centres while protecting well formulated centres hierarchy, could be explored to encourage investment from new competitors and new formats in the retail sector. This promotes new investment, new job creation, greater customer choice available to the broader community and greater utilisation of infrastructure surrounding and supporting existing centres. However, this should only occur with good reason to prevent dilution and a scattering of businesses throughout residential areas. Centres should be concentrated and go vertical and mixed use developments will support
both retail opportunity and population density. A key measure is whether there is a net community benefit from such broader retail expansion.

There is a need to look at the total ‘experience’ offered in retail centres to determine their success, not just the success of each business.

Co-ordinated branding for retail and commercial precincts (such as Mainstreets) can be effective.

It is important for the Code to take into consideration the market trends and the influences that the market has on development and demand, as these have a significant impact on the opportunities for new entrants to the market.

- **How do we harmonise planning objectives for an efficient pattern of settlement at the metropolitan level with the need to encourage investment in new retail facilities?** P37

A centralised retail activity approach can reduce overall land consumption (including valuable rural and agricultural land) by containing the urban footprint and also facilitate efficient use of existing state infrastructure thereby reducing the demands of the state’s new infrastructure investment capacity. Increased policy flexibility in and around the activity centre zones and mixed use zones could encourage increased land use diversity and diversity of retail activities in and around existing centres thereby maximising the return from existing infrastructure and creating greater retail supply and competition to support higher density development where an abundance of lower density development may currently exist.

The Existing Activity Centres Policy review DPA has been positive for applicants and generally not resulted in unreasonable impacts. Building code requirements for a change in building classification are however quite onerous.

A Regional Plan and co-ordinated metropolitan staging program should strategically identify any new retail land. These documents should ensure new retail land isn’t released or rezoned well in advance of need so as to not dilute the customer base of existing retailers, given the negative impacts this could have on local economic markets.

**Economic and Industrial Land Utilisation/Emerging Industries**

- **How do we ensure that the new system helps facilitate economic activity and provide Adelaide Employment Lands for current and emerging businesses and industries?** P43

The new planning system must strike a balance between the competing objectives of encouraging new industry investment and diversification while protecting valuable established agriculture and food production industries. Consideration needs to be not only on the planning implications for land use for these different industries but also the interface with the growing urban footprint. Greater mixed use and broader activity centres planning policies for existing facilities remains key to striking this balance, with due consideration to associated employment and other community benefits of such infill expansion.
Assistance with data capture, sharing and analysis would help councils/regions identify and support clusters and referrals.

It is important for regional plans and zoning in the Code to set aside sufficient land which is suitable for commercial and industrial uses to help protect the viability of a range of businesses.

- **How could Offset Schemes be used? P43**

Offset schemes can be utilised to provide important broader community services and facilities as ancillary parts of the infrastructure planning arrangements associated with new land utilisation brought about by new investment and economic activity.

The success of offset schemes will be heavily determined by the location of the offset scheme product; if the product is located too far from the contributing sites, it is less likely to be of immediate benefit to the occupants of the site and the local community more generally who may be affected by the shortfall on the site.

Offset schemes should only be allowed for particular aspects of development such as stormwater management, car parking etc and not to exceed established policy parameters (especially if the ‘offset’ is not related to the policy departure).

**Primary Industries**

- **Should the Code include a 40 metre interface buffer between rural and residential, but allow a smaller buffer distance if it can be justified? P53**

A recommendation is made to ‘adopt a more standardised urban/rural interface buffer policy across South Australia, with locational variation, where required.’ Reference could be made to the EPA’s Consultation Draft Guide for separation Distances August 2000.

- **Does policy regarding subdivision and minimum allotment sizes need to be reviewed and strengthened? P53**

The implied productivity gains associated with greater flexibility around planning policy and regulations regarding mixed use and adaptive re-use of existing land and facilities, supports a review of policy regarding subdivision and minimum allotment sizes.

However it is noted that smaller allotments do not always equal more efficiency. The ever competing objectives of environmental and social balance must not be overlooked however, for the sake of economic benefit.

Given current resistance on infill by communities, policy is still needed for clarity. It remains important to continue to advocate for more open space and better public realm as these are key attractors for new residents – jobs, better lifestyle – these all need to be in place to support these new communities.

It is important for policies to specify minimum allotment sizes which are based on surveys and feasibility studies to determine both the viability of the minimum site area in that location and to understand the existing and desired future character of the area. In a commercial context, minimum allotment sizes are likely to influence the nature of businesses which is important to consider when setting minimum sizes.
Tourism

- Do we need to review our signage policies? In particular, do we need facilities for third party advertising and tourism advertising? For example, should there be more scope for tourism signs on arterial roads and outside of townships? P54

Third party advertising and tourism advertising could be further developed with minimal environmental impact and would further support the major contribution that Tourism provides to the State's economy and provide an additional source of revenue. The scope of policy here could be broadened to also include wayfinding, not just advertising. Early and ongoing engagement should be held with key stakeholders to facilitate a coordinated approach and ensure broad based benefit from such initiatives. Stakeholders include land owners, DPTI, SATC, relevant Councils, Business SA and local BEC’s, business and tourism associations.

It would be useful to better define ‘third-party’ advertising. Schedule 2(8) of the regulations currently rule new signage displays as development, but exclude changing the contents of the sign (unless the advertisement area is increased) which may change from promoting an on-site business to a third party.

Policies should also be tailored to the context of the zone or area.

Mining and Exploration

- Should undeveloped strategic mineral resources be identified and protected from urban encroachment and other incompatible development? P55

While not specifically relevant to ERA, there is a need to define ‘incompatible development’ as we also need to provide flexibility for related and supportive industry, light industry and ancillary and associated developments in Mineral Extraction Zones. Again, reference to the EPA’s Consultation Draft Guide for Separation Distances August 2000 has application here. Given the cyclical nature of mining and exploration operations, flexibility in policy is key in providing certainty for the industry participants and enabling suitable development while still protecting future mineral wealth opportunities for all.

Theme 2 – Linking people to jobs, goods and services

Centres Retail and Mixed Use Activities

- Is there a need to retain the centres hierarchy or not – is it still relevant to today’s planning? P57

A centres hierarchy offers numerous benefits to businesses and the consumer community and affords a vision and policy planning framework to guide future major and minor retail and commercial activity centres across council areas. Opportunity exists here to link related clusters and e-commerce eg creative industries not in isolation but rather cafes, co-work spaces and other lifestyle elements. The question is not whether to retain or dispose of the centres hierarchy policy but more about the review of such policy to enable greater flexibility (for example in instances where there is potential expansion into
adjacent zones) and to ensure currency with the changing business environment, particularly e-commerce and the sharing economy.

Is there demonstrated demand that shows existing centres cannot cope with the changing business environment and that out of centre retail development is a viable solution? Careful consideration should be given to where and how an expansion of existing centres into adjacent zones should occur (if at all) to prevent unreasonable impacts.

Recent draft State Planning Policies appear to steer away from the centres hierarchy in favour of diversifying zones for greater development opportunities.

Particular consideration needs to be given to large format retailing due to the impact of them being located outside of current retail centres.

There remains a need for centres hierarchy, particularly in terms of local and neighbourhood centres. It is important to define set boundaries to centres so they stay contained, become consolidated and are effective hubs with planning controls in place to enable this and avoid dilution by out of centre and/or unstructured development. At the district and regional level, industry will generally self-regulate in regards to mix, scope and range.

- Should there be residential development within retail centres? If so, how could/should this occur? P57

Should be considered in line with developing a greater balance between high density and low density residential development, greater adaptive re-use and greater utilisation of existing infrastructure through clustering of residential and industry. Also of use where existing centres may now be outdated and require a redevelopment or reactivation.

Residential development in retail centres is supported in principle provided, that the residential development is subordinate to the primary retail purpose of the zone and provided that the residential use does not compromise the operations of commercial development or appropriate amenity for occupants. Ground level should be commercial uses only.

The mix of residential with retail can add to vibrancy (look to Malmo Sweden for example), creating environments where people can live, work and play in the same precinct, but needs to be carefully considered to ensure that the mix is right.

Employment Lands (Industry, Manufacturing and Commercial)

- Should there be a more flexible approach to encouraging a wide range of land uses in non-residential zones – with land use genus, impact and design focus, rather than strict land use definitions? P58

Important to review and update the South Australian Planning Policy Library (SAPPL) industry and commercial zones and existing policy intent, to remain in line with changing technologies, markets and business practice. There is a blurring of production and office
functions in many types of enterprises now (eg defence and manufacturing north of the CBD) and also opportunities to promote agglomeration through business clusters. The introduction of the SAPPL saw the greater introduction of mixed use zones (for example, the Urban Employment Zone which provides for a range of activity across industry, commercial, offices etc)

It will be important to maintain sufficient land for ‘traditional’ commercial uses in suitable locations to avoid industries being pushed out to urban fringes. This however, must be balanced with creating new opportunities for emerging industries.

Is there too much emphasis placed on height and setback criteria in employment land zones, in particular the ‘core’ of these zones? P58

Emphasis should be shared across a mixture of land use genus and impact and design focus along with the traditional planning focus on height and setback criteria. There is still an importance for height and setback criteria but a focus is also needed here on design as well as interface and transition zones.

Home-based Businesses

- What innovations and changes to work practices will impact the planning system and how should we respond? P59

More flexible workplace practices from all levels of corporates are now enabling far greater utilisation of home based work schedules or employees and contractors. In the E-commerce world, home based businesses now have potential to grow into much larger enterprises and in a relatively short period of time. A review is required of home industry zones and policies to ensure policy keeps up with the pace of change in this sector and also the growing demand for low impact home-industry activities. As previously mentioned, it is important to determine the difference between ‘home based business’ and ‘home industry’ when considering related policy as they are not one and the same.

Activities relating to the ‘Sharing Economy’ are likely to have a big impact on the planning system in relation to accommodation, co-working spaces and car-sharing if designated spaces need to be provided in developments.

It is recommended that definitions and associated policies relating to home-based businesses be included in the Code given the diversity in current policies. It is also important that the Code provide guidance on how to deal with new land uses that are continuing to diversify in response to new businesses and new ways of working.

Theme 3 – Providing infrastructure to enhance our liveability

Renewable Energy

How should planning policy respond to growth in renewable energy – what issues should be addressed? P60

There are a wide range of renewable energy sources and South Australia leads the country in its adoption of these for both residential and also wide scale commercial use. Policy needs
to respond to ensure it remains current in this fast growing technological sector and continues to effectively assess the impact of this growth sector. This includes but is not limited to environmental and also community impact.

**Adaptive Reuse**

- Should existing unused farm houses be able to separately titled to allow their adaptive reuse and to facilitate economic activity? P61

Possible uses include short term stay options which are easily enabled now through E-commerce platforms like AirBNB, cellar door facilities and an array of food and beverage manufacturing and hospitality options. If separate titling is deemed by business to reduce red tape for this type of business investment and growth strategy then it should be considered.

**Infrastructure**

- How can we ensure that land use planning is able to accommodate and support the provision of new and innovative infrastructure? P61

The Dutch MIRT programme is the multi-year programme for infrastructure, spatial planning and transport. All parties within the programme collaborate on projects and initiatives regarding infrastructure and water – parties include various ministries and regional parties including provinces, municipalities, transport regions, non-government organisations and businesses and all participate to varying degrees by providing input to solutions. This collaborative model across all forms of public sector, private sector and relevant organisations and authorities could be adopted to provide the platform for effective planning of new, innovative and economically beneficial infrastructure projects. Federal services like Broadband, should be included as key infrastructure with the State providing a concierge service to councils in order to get co-ordinated outcomes.

**Theme 4 – Facilitating innovation and enabling investment**

**Collaboration and Clustering**

- Do we have adequate planning policies in place to encourage/support the aims of innovation districts? P62

There is a need for more rigour in policy approach here as the current system is not optimal. Opportunity exists to review existing planning policies with regard to specialist development clustering within a zone, along with possible refinement of SAPPL policies to encourage emerging technology adoption. An innovation district requires mixed use complementary planning policies supporting regeneration of existing location that attracts innovative and creative companies, workers, supporting businesses and neighbouring residential precincts. Planning has a vital role in connecting the three main assets that make up the Innovation Ecosystem – Economic, Physical and Networking assets.
The planning system can facilitate innovation districts by identifying appropriate locations (with appropriate infrastructure) and creating suitable zones and policies if there is sufficient demonstration of needs and opportunities.

Better sharing of data will facilitate councils to make better decisions and make identifying clusters easier.

- **How do we ensure that residential development does not monopolise the offering in mixed-use areas of innovation districts? P62**

Special zones or policy overlays may be necessary to secure the potential of identified innovation precincts and prevent their loss through short term/short sighted development. That is, unique limits may be required on residential content of such innovation districts to ensure crowding out doesn’t occur. Residential uplift should not occur at the expense of retail/innovation.

Code policies should:

- State that ground level should be commercial uses only.
- Provide incentives for mixed use buildings where appropriate (eg 3 storey maximum height for mixed uses versus a 2 storey maximum height for residential only).
- Allow more policy flexibility for mixed use developments.

**E-Commerce and Sharing Economy**

- **Does planning policy need to respond better to new ways of doing business such as the emergence of the sharing economy – which may require the introduction of controls to mitigate previously unanticipated effects (for example, the conversion of long term rentals into short stay holiday accommodation via online platforms)? P62**

E-commerce and the digital web based economy is constantly evolving with new technologies facilitating an unprecedented pace of change for industry development and new industry formation and growth. It is difficult for planning policy to match this pace of change – a better approach is to remain flexible and open to change, interpretation and variation with regard to planning policy relating to this field. A dynamic approach is necessary to remain current and relevant to the E-commerce and sharing economy. The P2P, sharing and collaborative economies are informal in their nature, often lack conventional structures and present complexities in their managing, monitoring and regulation. Traditional planning policies will need a dynamic response mechanism to these new e-commerce opportunities. The new Code should focus on the implications/effects of the activity, not necessarily the activity itself.

The new planning system will need to adapt to the sharing economy. In particular, the short-term accommodation sector, which is growing globally, and changing the way people use accommodation services. The industry has introduced accommodation services into residential areas that were occupied by permanent residents. The Code will need to address this as a change of use.
The circular economy and re-use, waste management and ‘buy local’ initiatives should all be made easier by the Code.

- **What will be the emerging industry impacts of e-Commerce and how should these be managed by the Code? P62**

Further investigation is required to determine the scale and form of the industry impacts of E-Commerce. It is recommended that these investigations continue and are addressed in future generations of the Code.