Dear Sir/Madam,

Re: Productive Economy - Policy Discussion Paper

Please find below the Town of Gawler’s (Council) submission concerning the Productive Economy Discussion Paper which was released for public consultation on 28 November 2018. We have gathered comments from Council Staff and Elected Members to provide professional and meaningful feedback regarding this discussion paper.

Council is pleased to see that the subject document also speaks to environmental considerations and in effect demonstrates that a healthy environment is vital to the South Australian economy prospering. Vital industries such as tourism, eco-tourism, agriculture, viticulture, horticulture, forestry and fishing all play a considerable role in our state’s economy and are intrinsically linked to a healthy natural environment.

More specific feedback is provided below under each theme:

Theme 1 – Supporting and Growing Key Industries

Sub Theme 1.1 – Primary Industries

Concerning 1B the challenge presented suggests that ‘Planning policy needs to conserve natural environments, biodiversity and agriculture lands to ensure continued productivity’ with the proposed response being ‘Include the EFPA and McLaren Vale and Barossa Valley Character Preservation Districts into the Code as an overlay’.

This is not a state wide approach as the Environment and Food Production Area is only marginally bigger than Greater Adelaide and encompasses primarily farming land. It is appreciated that the Natural Resources and Environment Policy Discussion Paper provides greater guidance in this space, however the proposed response is a little shallow
**Theme 2 – Linking People to Jobs, Goods and Services**

**Sub Theme 2.1 – Centres, retail and mixed use activities**

As has been discussed throughout the reforms process, zones which are similar in intent will be consolidated to provide efficiencies. The discussion paper speaks specifically to regional centre and activity centre policies being updated and consolidated where appropriate.

Council wishes to reiterate that we are committed to revitalising and invigorating our Town Centre and that policy change in this space should be cognisant of heritage values and the intrinsic role it plays within our community.

The discussion paper suggests that the Planning and Design Code (Code) will seek to generate more flexible policy to allow certain business activities to occur in traditionally mono land use (residential) zones. The reason for this conversation at this point in time is understood and Council is supportive of stimulating an environment which promotes our local economies and encourages growth, however we do not wish to see the quality of our built environments eroded.

Council wishes to encourage DPTI to fully exploit the Community Engagement Charter through the development of such policy through later reforms of the Code, as genuine consultation will be key to success in this space.

**Sub Theme 2.2 – Employment lands (industry, manufacturing and commercial)**

The paper suggests that productive industrial lands are being placed under pressure by encroachment of more sensitive and incompatible land uses. This is proposed to be dealt with through reform generation one. At this stage, where detail concerning what the Planning and Design Code will look and act like and how flexible it may be as policy is being developed and refined, this matter should be treated with a sense of urgency.

**Theme 3 – Providing Infrastructure to Enhance our Liveability**

Under theme three and more specifically sub theme 3.1 the discussion paper speaks to the development of policy to guide the generation of renewable energy. This is seen as a positive initiative, as climate change continues to seriously threaten our planet and a cultural shift for environmentally friendly resources gathers enormous momentum. Policies developed in this space should play to our state’s strengths, which are likely to remain in the forms of solar and wind power.

In regard to infrastructure, the Discussion Paper speaks to the review and refinement of policy pertinent to separation distances from infrastructure utilities, which is to be worked through during reform Generation One of the Code.

As DPTI is aware, the matter of development encroaching infrastructure of state significance has been challenging within the Gawler East development area. This land was rezoned via a Ministerial Development Plan Amendment (DPA) in 2010 without suitable consideration of existing infrastructure.
Without clear legislative guidance in place to assist in this matter, it has been left to service providers, developers and Councils to try to broker practical and equitable solutions, with this particular example still ongoing.

This matter requires significant attention from DPTI and should be treated with a sense of urgency.

**Theme 4 – Facilitating Innovation and Enabling Investment**

The paper discusses the notion of innovation districts and such areas becoming true mixed use style developments, which do not become monopolised by residential development and thus stifle other land uses. Mixed use urban environments have experienced some success in Adelaide e.g. Mawson lakes and Bowden, however these developments have not pushed the envelope quite as far as this discussion paper contemplates, in terms of clustering residential and business land uses. This type of environment will be difficult to engender purely through policy change as it requires a vision for an environment which itself is still evolving.

An approach similar to that of the Bowden redevelopment is likely to provide the greatest likelihood of success, however it may potentially need an even more detailed masterplan which is to be carried out stringently to ensure the vision is truly delivered upon.

We would to thank the Department of Planning Transport and Infrastructure (DPTI) and the State Planning Commission for the opportunity to comment.

Yours faithfully,

[Karen Redman
MAYOR]