Dear Alex

RE: Productive economy policy discussion paper response

Thank you for the opportunity to respond to the Productive Economy Policy Discussion Paper. Our responses are summarised below:

Responses are linked to the themes, sub themes in the transition table on Page 52 of the Discussion Paper. Responses are only given where a comment is deemed necessary or there is a perceived issue with the proposed policy.

1. SUPPORTING AND GROWING KEY INDUSTRIES

- Primary Industries

Council undertook considerable effort in the Rural (PPP) DPA to address the issue of value adding and job growth in the food production sector. Additional local policy was added to reinforce and give greater clarity to this policy intent. Council will be agitating for these existing local policies to be carried over to the Code.

The review of definitions is supported in principle.

The introduction of a more standardised urban/rural interface buffer policy across the state with locality variation is supported. While this is supported in principal, any review of a buffer and subsequent amendments should be skewed in favour in the continuation and adaption of all forms of primary industry, including horticulture. Primary Industry should not be penalised for the urban expansion of existing settlements and towns or the construction of dwellings on allotments within the Primary Production Zone.

Any review of animal keeping needs to seriously consider horse keeping and environmental impacts within the Mount Lofty Ranges.
Minimum allotment sizes have not been applied in our Primary Production Zone, with the exception of smaller allotments and the controls imposed by the Environment and Food Protection Area.

- **Tourism**
  
The non-complying list for tourist accommodation in the Watershed Overlay (Areas 2 & 3) is still too restrictive where the accommodation is considered as part of a value adding activity.

- **Mining and Exploration**
  
  Given climate change, increased temperatures, changing rain fall patterns, and in particular the productive South East of SA and the Mount Lofty Ranges the question should be reversed as follows:
  
  "Should existing and sustainable agricultural and horticultural resources, activities and land be identified and protected from encroachment by mining and mineral extraction."

2. **LINKING PEOPLE TO JOBS, GOODS AND SERVICES**

- **Centres, retail and mixed use activities**
  
  Council is of the understanding that the Activity Centres Review had already undertaken a review of retail policy.

  The Mount Barker Bulky Goods Policy Area (based on the zone) has delivered a built form, scale of development that is vastly different from the main retail area the Mount Barker Township. The urban design principles that apply to the main retail policy area of the Mount Barker Regional Town Centre do not apply to the Bulky Goods Policy Area. To translate into a broader zone option would have to consider these differences and proceed with caution.

  Examples of activity centre land use already occur outside of the centre zones in Mount Barker. However, they are predominately located at the interface with the Regional Town Centre Zone or along the main arterial roads adjacent to or within proximity of an existing Local Centre Zone. A significant consideration in the assessment of these land uses is the existing low residential amenity of the site, largely due to the sheer volume and frequency of vehicular traffic.

  Residential development should be curtailed within retail centres, especially in traditional main streets unless it is ancillary to and in association with an envisaged use. Further, specific policy can include residential development as part of a mixed use building where commercial function occurs on the ground floor. These polices have been both introduced and reinforced by Mount Barker Council's recent centre focused Development Plan Amendments.
• **Employment lands (industry, manufacturing and commercial)**

Council supports a review of industry and employment zones to ensure industrial and commercial activities are protected from encroachment from more sensitive land uses.

Council is encouraging of zoning that supports industry and commercial clusters. Encouraging a wider range of land uses in non-residential zones has to be considered in relation the purpose of the zone. Appropriate land use in the impending Totness Employment Lands Zone has been considered in relation to maintaining the primacy of and not competing with the Regional Town Centre Zone. Especially as these two zones are located approximately one kilometre from each other.

The Home Industry Zone in the Mount Barker Development Plan has had limited success in realising home based industry. Rather it has resulted in predominately residential development.

3. **PROVIDING INFRASTRUCTURE TO IMPROVE OUR LIVEABILITY**

• **Adaptive Reuses**

Adaptive re-use of buildings should not compromise or diminish the heritage value or significance of heritage listed buildings.

The excision of existing and unused farmhouses should only be considered in conjunction with a restriction on the balance allotment prohibiting new or additional dwellings. Otherwise this type of land division would further contribute to the fragmentation of farmland.

• **Infrastructure**

The review of separation distances from infrastructure (such as waste water treatment plants) should be undertaken with caution as their purpose is to avoid conflict with and detriment to more sensitive land uses.

Should your team wish to Clarify any of our comments, please contact Simon Coote on [redacted] or [redacted].

Kind Regards

Like Gray
Manager planning Policy & Strategy