21 January 2019

Department of Planning Transport and Infrastructure
Via the Planning Reform Portal

Dear Sir/Madam

Re: City of Salisbury Submission on Productive Economy Discussion Paper

The City of Salisbury thanks you for the opportunity to make a submission on the Productive Economy Discussion Paper. Council considered this matter at its 28 January 2019 meeting and wishes to make the following comments.

This topic is of significant interest to the City of Salisbury given it is the third largest economy in the State (by job numbers) and the fourth largest economy (by Gross Regional Product). Salisbury is home to significant infrastructure, research capability and firms that are engaged in sectors that are important for the state's future economic performance. These include defence, space, food processing, cyber security, logistics and advanced manufacturing. In addition Salisbury's growing population will generate additional demands for goods and services that will support future growth of more locally-focussed sectors such as retail, personal services, restaurants/cafes and health services.

Linkage with Integrated Movement Systems Discussion Paper
There is a strong linkage between this discussion paper and the integrated movement discussion paper that Council previously provided comment on. As such this response should be read in conjunction with Council's response to that discussion paper. Three matters are of particular interest:

- Balancing support for the continued operation and expansion of activities on airports with the impacts on communities and investment activity surrounding them. The paper is silent on the role of civil and defence airport operations and their impact as economic drivers in their own right, and the impacts the airport operations have on the communities around them (which includes business and industries). Council’s previous position is that a consistent approach to land use planning, which includes application of federal guidelines, around airports Is desirable.

- Increased recognition of the need to consider east-west transport linkages and associated public transport routes to support a poly-centric urban structure. Council wishes to reiterate that to improve commuter and freight movement operations there is a need to significantly upgrade east west linkages (such as Elder Smith Road, Kings Road, Edinburgh Road and Park Terrace) that serve as connectors between north south routes.

- There is a need to consider the role of public transport interchange facilities as an anchor for locally focussed economic activity. While the term Transport Oriented Development is not used in the discussion paper, the principles of such developments (such as a focus on job-generating activities, mixed use, frequent transport movements, etc) remain robust and should be applied to the area around the Salisbury and Mawson Lakes Interchanges.

Industrial land and Innovation Precincts
- The paper takes a fairly pessimistic stance on the role of manufacturing. Manufacturing remains a significant part of Salisbury's economy, is being rapidly reshaped by technology and underpins many of the State's future industry drivers. Council's view is that the Planning and Design Code needs to recognise the changing nature of manufacturing and that it may be
appropriately located in places not originally thought of as industry. The ability to zone land in a manner which allows a wider range of uses and recognises the changing nature of many activities should be considered.

- However there are still manufacturing activities that have an impact on the surrounding community. Part of that policy consideration should be the interface treatments between land uses and identification of buffer distances, with an authoritative background and references for particular distances or treatments. The issue of new sensitive land uses near existing Industry must be included in the Planning and Design Code so as to anticipate potential friction and impacts that may occur.

- There is a strong need for employment land policy and provision to be based on updated employment land supply-demand analysis and forecasts.

- The recommendation to consider "improved zoning to support industry and commercial clusters" should be considered as a "Gen 1" reform rather than "Gen 2 and beyond" given the importance of this to supporting and enabling the growth of future economic drivers for this State.

- Innovation precincts should be recognised in the Planning and Design Code policies with supportive policies that reflect the nature of the enterprises and their often rapid and differing growth needs. Technology Park, Edinburgh Parks and the Edinburgh Defence Precinct should be viewed as innovation precincts because of their research intensity and contribution to industry and employment.

- Allied to the broad themes of innovation and employment lands is the need for the Code to allow flexibility in assessing and trialing new rapidly-changing technologies including those relating to renewable energy.

**Centres hierarchy and retail**

- The nature of the retail policy and the State's approach to centres hierarchy needs be established especially when taken in the context of the competition policy reviews by the Federal Government and the structure of the State's transport network.

- The current approach provides significant uncertainty in the assessment of retail types and consideration of new retail formats entering or wishing to enter the market. Consequently, Councils and retailers can expend much effort, justification and expense in rezoning or assessment matters. This aspect must be settled in the Planning and Design Code preparation.

- The definition of retail and its relationship with 'Bulky Goods' retail has caused much confusion in land use planning, assessment and to the retailers and the general community. Consideration is required as to whether retail is to be deemed an employment generator which is linked to industry or urban employment zones, or in discrete zones such as centre zones. Other factors such as airport retail, commercial and employment development are of such a size and impact on the economy that they should be considered in reviewing retail policy settings, even if they come under Federal jurisdictions.

Should you require further information on the matters raised, please contact Peter Jansen, Senior Policy Planner, [Email]. The Council looks forward to continuing to work with the State Government in the development of the Planning and Design Code.

Yours faithfully,

Chris Zafiropoulos
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