22 February 2019

State Planning Commission  
DPTI Planning Engagement  
Department Planning, Transport and Infrastructure  
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Adelaide  SA  5001

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SOUTH AUSTRALIAN PLANNING SYSTEM REFORM

Planning and Design Code  
Productive Economy Policy Discussion Paper

The Productive Economy Policy Discussion Paper released in November 2018 generally provides a laudable outline of the range and nature of issues, associated approach to pertinent policy and transition into the new Planning and Design Code (P+D Code).

A complete appreciation and review is challenging when, as acknowledged in the paper, it is one part of a package of 5 Discussion Papers that should be read together but only 3 are currently available.

It is understood a further 2 Discussion Papers are to be released in March 2019, with periods for feedback provided accordingly. This doesn’t help with the current review and leads to feedback not being available or able to be readily incorporated prior to the anticipated release of the new P+D Code policy elements from February 2019.

Higher level discussion has been ongoing during 2018 but the critical test occurs with the actual final detail of the policy and application in the new P+D Code. The actual policy should not be delayed and should be released as soon as possible to afford the maximum time period, genuine detailed community engagement, depth and length of discussion and potential comprehensive refinement of the actual policy.

The high-level strategic direction for planning is provided through the Planning Strategy, eg the 30-Year Plan for Greater Adelaide (GA30). The GA30 contains no spatial clarity and critically needs sub-regional finer grained spatially resolved plans to reconcile and resolve policy direction and spatial application as soon as possible. This is fundamental to provide context for anticipated future P+D Code amendments, particularly private amendments that may be adhoc and site-specific, eg outside retail and centres zones and hierarchy, zone extensions and desired land use function and good design issues.
For example, the previous trend and proposed wide roll-out of the Urban Corridor Zone promoted broad flexibility and ‘anything everywhere’ without evidence based investigations, review or support, and undermined current consolidation of activity locations.

The inherent tensions in strategic and policy direction for both flexibility and certainty are challenging to resolve; as illustrated in the paper ... “Flexible policy enabling environment that unlocks development, innovation and liveability, facilitate and enable economic growth opportunities ...” but can“... provide clarity, opportunity and security ... are more transparent, consistent and reliable”.

Focus of paper is on producing and facilitating economic growth but there is a lack of consideration of the costs to the economy of not achieving broader, proper and appropriate planned and designed outcomes for community, function, built form and environmental benefits.

This feedback should be read together with the paper (and summary and background papers).

*Productive Economy Policy Discussion Paper, Summary and Background Report*


http://www.saplanningportal.sa.gov.au/__data/assets/pdf_file/0005/513329/Land_Use_Planning_and_the_South_Australian_Economy.pdf

The *Productive Economy Policy Discussion Paper* canvasses the following:

*Introduction*

*Purpose*

*A productive economy for South Australia*

*Key trends influencing change*

  - Global trends and influences
  - Local trends and influences
  - South Australia’s competitive advantages

*Supporting our future economic prosperity through the new planning system*

  - Strategic Directions
  - South Australian Planning Policy Library
  - Working with other levers

*How can the new system deliver a productive economy?*

  - **Theme 1:** Supporting and growing key industries
  - **Policy Conversation Area – Metropolitan growth management**
  - **Theme 2:** Linking people to jobs, goods and services
  - **Policy Conversation Area – Centres policy and retail investment**
  - **Theme 3:** Providing infrastructure to enhance our liveability
  - **Policy Conversation Area – Economic and industrial land utilisation / emerging industries**
  - **Theme 4:** Facilitating innovation and enabling investment
Transitioning to the Planning and Design Code

Theme 1: Supporting and Growing Key Industries
- 1.1 Primary Industries
- 1.2 Tourism
- 1.3 Mining and exploration

Theme 2: Linking People to Jobs, Goods and Services
- 2.1 Centres, retail and mixed use activities
- 2.2 Employment lands (industry, manufacturing and commercial)
- 2.3 Home-based businesses

Theme 3: Providing Infrastructure to enhance Our Liveability
- 3.1 Renewable energy
- 3.2 Adaptive reuse
- 3.3 Infrastructure

Theme 4: Facilitating Innovation and enabling Investment
- 4.1 Collaboration and clustering
- 4.2 E-Commerce and a sharing economy

References

Next steps

Have your say

More detailed feedback on the Policy Transition Recommendations is provided in the attached appendix and follows the Paper’s structure and suggested Discussion Points, without limiting further observations.

This feedback has its basis in existing City of Unley Strategies, Plans and Targets:
- Community Plan 2033 and Four Year Delivery Plan 2017-2021;
- Development Strategic Directions Framework;
- Integrated Transport Strategy;
- Walking and Cycling Plan;

It is trusted this general and specific feedback, sought by 22 February 2019, assists with the State Planning Commission and Department of Planning Transport and Infrastructure refinement and enhancement of the P+D Code policy.

Should you have any questions please contact David Brown, Principal Policy Planner, on [blank] or [blank].

Yours faithfully

Peter Tsokas
CHIEF EXECUTIVE OFFICER
Productive Economy Policy Discussion Paper

Transitioning to the Planning and Design Code - Recommendations

**Theme 1 - Supporting and Growing Key Industries**

**Sub Theme – 1.1 Primary Industries**
No comment – not spatially relevant

**Sub theme 1.2 – Tourism**

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>1J</td>
<td>Tourism is important for the State’s economy and therefore it is important to encourage and support its growth.</td>
<td>Refine and transition the policy intent of SAPPL Tourism Development General Module policy.</td>
<td>Transition Ready</td>
<td>The unique history and character of SA buildings, traditional main streets and collective value of early suburban areas create a distinct tourism identity that should be better supported.</td>
</tr>
</tbody>
</table>
| 1K     | It is important to strengthen and provide greater certainty to tourism and where it should be located. | Refine SAPPL Zones and the land use definitions to:  
- clearly define where tourist accommodation is anticipated  
- set the appropriate level of assessment  
- ensure the definitions provide certainty and consistency for the purpose of assessment  
- provide the flexibility required for the tourism industry to respond to changing markets and explore innovative ideas. | Reform (Gen 1) | Unique locations across the state, Adelaide and the suburbs are unique destinations to protect that require incorporation of sensitive necessary tourist accommodation, ie shorter tenure forms of residential dwellings which seamlessly fit the critical historic and character form. |

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

<table>
<thead>
<tr>
<th>Sub theme 1.3– Mining and exploration</th>
</tr>
</thead>
<tbody>
<tr>
<td>No comment – not spatially relevant</td>
</tr>
</tbody>
</table>
### Theme 2: Linking people to jobs, goods and services

#### Sub theme 2.1 – Centres, retail and mixed use activities

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>2A</td>
<td>Centres are an important part of SA’s economy. There is an opportunity to consolidate the range of centre type zones (including regional centre zones) and transition to the Code.</td>
<td>Transition, update and consolidate the existing contemporary retailing, activity centres and regional centre policies and zones.</td>
<td>Transition ready</td>
<td>Support</td>
</tr>
<tr>
<td>2B</td>
<td>Promote mixed use zoning and flexible policy to support innovation, growth and diversity to provide for changing business and market needs, particularly in the right locations.</td>
<td>Review and transition the policy intent of SAPPL mixed use zones.</td>
<td>Transition ready</td>
<td>Key is to ensure a stratum and distinctive suite of zones and nature of development to encourage consolidation of activity into appropriate locations and not allow undermining dispersal and dilution.</td>
</tr>
<tr>
<td>2C</td>
<td>Conventional ‘bricks and mortar’ retail industry is experiencing significant disruption by out-of-centre retailing, international competitors entering the market, online retailing and shared economies and this is changing the form, scale, intensity and locations of retail activities.</td>
<td>Undertake a review of retail policy and consider how it can be strengthened to respond to current and future challenges and opportunities.</td>
<td>Reform (Gen 1)</td>
<td>See above.</td>
</tr>
<tr>
<td>2D</td>
<td>The Bulky Goods Zone is not consistent with general zone structure and intent as it lacks fundamental policy differentiation to warrant separate zoning / policy identification.</td>
<td>Transition of the policy intent of the SAPPL Bulky Goods Zone into a broader zone option.</td>
<td>Reform (Gen 1)</td>
<td>Creation of separate so-called ‘bulky goods’ homemaker retail centres has undermined the general centres structure and hierarchy. Support inclusion and consolidation within broader defined structure and hierarchy.</td>
</tr>
<tr>
<td>2E</td>
<td>Town centres could allow for a ‘softening of edges’ with a transition between business and residential activities and mixed use developments.</td>
<td>Review policy opportunities for expansion of activity centre developments into adjacent zones (where appropriate).</td>
<td>Reform (Gen 2)</td>
<td>‘Soft edges’ and vague transition lack certainty and transparency, for commercial investors and/or adjacent residential owners. Need well justified clear</td>
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<tr>
<td>2F</td>
<td>The recently approved Existing Activity Centres Policy Review DPA introduced a number of policy changes to activity centres in the metropolitan area to improve economic efficiencies and increase competitiveness. These changes should be considered for application in regional areas where appropriate.</td>
<td>Investigate the opportunities to update centres policies for regional townships and cities.</td>
<td>Reform (Gen 2)</td>
<td>Simplified land use change (within like groups), reduced generic on-site parking requirements and flexible policy was a broad approach to nuanced centres and issues not always successful. Evidence, need and implications would need careful review.</td>
</tr>
<tr>
<td>2G</td>
<td>Many regional centre type zones are now out of date. Especially if a centre is showing signs of decline, consider approach to re-activate or change scope.</td>
<td>Explore policy options regarding redevelopment of or rezoning of regional activity centres which are in decline or vacant.</td>
<td>Reform (Gen 2)</td>
<td>Need to investigate reasons behind situation and evidence for change when regional centres by their nature have very broad scope and flexibility – this, and lack of clear rigor of composition and spatial structure, may be reason for decline.</td>
</tr>
</tbody>
</table>

**Discussion Questions:**

- *Is there a need to retain the centres hierarchy or not – is it still relevant to today’s planning?*
  - Yes. A structure and hierarchy is critical to reinforce centres, avoid dispersed dilution and promote consolidation of activity.
  - Residential development in addition to, not in lieu, located above and behind can be complementary with most commercial activity and intensify and enliven activity in centres. Requires sensitive height, transition and/or compatible centre peripheral residential opportunities. Such centres could integrate ‘clean industry’ with an adequate definition regarding impacts.
## Sub theme 2.2 – Employment lands (industry, manufacturing and commercial)

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<tr>
<td>2H</td>
<td>There is a need to provide flexible policy that enables a diversity of industry and commercial activities which reflects changing industry trends.</td>
<td>Review, consolidate and transition the policy intent of SAPPL industry and commercial zones to respond to changing technologies and markets.</td>
<td>Transition ready</td>
<td>Support subject to consideration and management of externalities.</td>
</tr>
<tr>
<td>2I</td>
<td>There is increased pressure on industrial lands and the economic viability of industries through encroachment upon by sensitive uses. Therefore it is important to review and refine these policies.</td>
<td>Review and update SAPPL industry zones to ensure that industrial activities are protected from encroachment by conflicting land uses.</td>
<td>Reform (Gen 1)</td>
<td>Clear policy and rigor in application necessary. Good research and evidence is critical.</td>
</tr>
<tr>
<td>2J</td>
<td>There is a need for consideration of residential development that is ancillary to business/industrial activities on land in employment land type zones. For example, accommodation for truck drivers, on-site managers, business owners and other workers.</td>
<td>Review and update policy in relation to the provision of short-term / ancillary worker development in industrial zones to support economic activities (such as defence and mining).</td>
<td>Reform (Gen 2)</td>
<td>Support, while ancillary and respect primary use.</td>
</tr>
<tr>
<td>2K</td>
<td>Consider opportunities to promote business clusters on the basis of shared knowledge, infrastructure, skills or labour to unlock economies of scope and scale (where appropriate). For example, science and technology hubs, defence industries, ports and intermodals and waste management.</td>
<td>Identify and improve zoning that supports industry and commercial clusters.</td>
<td>Reform (Gen 2)</td>
<td>Desirable logic but difficult to control specific choices and mix of uses given, range, desired flexibility and changing trends.</td>
</tr>
</tbody>
</table>

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

Clusters of appropriate synergist uses reasonable but need a range of distinct types of mixes that complement each other.
• Is there too much emphasis placed on height and setback criteria as it relates to employment lands zones, in particular the ‘core’ of these zones?

rather than dilute clusters. Urban Design built form is important, but within broad employment / industry zones less so. Focus has related to traditional industry and impacts, but no attention has been paid to the increasing ‘clean industry’ that has minimal external impacts (emissions, traffic etc) and could be accommodated in a much broader range of locations, eg retail activity centres, mixed use centres etc.

Sub theme 2.3 – Home-based businesses

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<tr>
<td>2L</td>
<td>The Code provides an opportunity to review home industry policy and decide whether it should be in a residential or light industry zone in the future.</td>
<td>Review and transition home industry policies to an appropriate zone.</td>
<td>Transition ready</td>
<td>Problematic tensions arise between land use mix given long-term investments and growth industry scale by some but not others. Requires rigor to ensure proper mix and respective scale to enforce growing industry into suitable zones, and not allow untoward expansion in a transition zone. Preferable to pursue option in industry (not residential) zones, with residential option as an ancillary activity.</td>
</tr>
</tbody>
</table>

Discussion Question:

• Will innovations and changes to work practices will impact the planning system and how should we respond?

Has, does and will continue to, eg office employment density, retail practices etc
Proper and orderly planning would require some continuing rigor and longer term view to maintain scope for future proofing development.
### Theme 3: Providing infrastructure to enhance our liveability

#### Sub theme 3.1 – Renewable energy

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<tr>
<td>3A</td>
<td>There is a wide range of renewable energy sources including wind, solar, geothermal, hydrogen, hydropower, tidal and biofuels. Policy needs to be updated to keep up with the new forms of development and technological changes. This means providing improved guidance regarding the intensity, location and impacts of these developments.</td>
<td>Investigate and introduce policy to provide improved guidance in relation to renewable energy generation developments.</td>
<td>Reform (Gen 1)</td>
<td>Support</td>
</tr>
</tbody>
</table>

**Discussion Question:**
- *How should planning policy respond to growth in renewable energy – what issues should be addressed?*

- Necessary for future and need to facilitate but location and externalities need careful management to avoid undue implications.

#### Sub theme 3.2 – Adaptive reuse

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<tr>
<td>3B</td>
<td>There are opportunities for policy incentives to encourage adaptive reuse, particularly in relation to heritage or character properties that contribute to the amenity of an area.</td>
<td>Identify policy incentives that can promote adaptive reuse of buildings.</td>
<td>Reform (Gen 1)</td>
<td>Support protection, maintenance and adaptation policy and attitude for legacy and embodied energy benefits. Incentivise but not at expense of appropriate function and form.</td>
</tr>
</tbody>
</table>

| 3C     | Consider the appropriateness of land division of surplus on-farm dwellings to promote ongoing use of valued heritage type buildings - provided it does not affect the long term viability of farming activities. | Review opportunities and investigate the appropriateness of including policies to facilitate the adaptive re-use of disused farm dwellings. | Reform (Gen 2) | Support flexibility of right outcomes – and avoiding wrong ones. |

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

- If achieves mutual benefit without compromise to
## Sub theme 3.3 – Infrastructure

<table>
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<tr>
<td>3D</td>
<td>There is a variety of infrastructure-type zones across development plans and these can lack fundamental differentiation. These should be reviewed and potentially consolidated to provide overarching consistency and certainty.</td>
<td>Review and transition infrastructure-based zones to provide improved consistency.</td>
<td>Transition ready</td>
<td>Need to ensure appropriate provision with focus on management of externalities. Generic consolidation and simplistic idea for consistency may compromise certainty.</td>
</tr>
<tr>
<td>3E</td>
<td>It is important to provide clear direction in regards to appropriate separation distances for infrastructure such as waste water treatment plants and power generation facilities.</td>
<td>Review separate distances for infrastructure (e.g. utilities) and identify opportunities for appropriate uses within buffer spaces.</td>
<td>Reform (Gen 1)</td>
<td>Support</td>
</tr>
</tbody>
</table>

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

Appropriate infrastructure planning and early identification of provision in plans.
## Theme 4: Facilitating innovation and enabling investment

### Sub theme 4.1 – Collaboration and clustering

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<tbody>
<tr>
<td>4A</td>
<td>It is important to find the balance between policy certainty and policy flexibility in zones that support economic development and clustering.</td>
<td>Explore options and identify opportunities for improved policies for specialist development clustering within a zone (including business ecology precincts).</td>
<td>Reform (Gen 1)</td>
<td>Clusters of appropriate synergist uses reasonable but need a range of distinct types of mixes that complement each other rather than dilute clusters.</td>
</tr>
<tr>
<td>4B</td>
<td>There is a need for consideration of new manufacturing technologies (that are not dirty, noisy, smelly or impacting) which potentially allow for a mix of uses in residential and business zones.</td>
<td>Review and refine SAPPL policies that support and encourage the adoption of emerging technologies and ensuring flexibility to accommodate future ones in land use design and development.</td>
<td>Reform (Gen 1)</td>
<td>Traditional industry necessarily limits locations, but increasing ‘clean industry’ activities with minimal external impacts (emissions, traffic etc) could be accommodated in a much broader range of locations, eg retail activity centres, mixed use centres etc but not likely residential unless fit ‘home activity’ scale.</td>
</tr>
</tbody>
</table>

### Discussion Questions:

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

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

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<tbody>
<tr>
<td>4C</td>
<td>Planning processes, policy formulation and regulatory structures all need to be reviewed</td>
<td>Continue to further investigate the anticipated impacts of e-Commerce and respond to in future</td>
<td>Reform (Gen 2)</td>
<td>Planning and policy limited scope presents a challenge but should recognise impact from e-commerce</td>
</tr>
</tbody>
</table>

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General no, but broad flexibility of planning challenges option of limiting nature too strictly, which therefore compromises specific aim. Policy expression and desired outcome being clear and comprehensive, and equally rigorous decisions to stop undesirable compromise. Appropriate incentives, not compromising fundamental outcomes, may balance ‘carrot and stick’ approach. Need to be tough and say no sometimes.
and, where appropriate, redesigned to take advantage of the development opportunities presented by e-Commerce in a safe, equitable and orderly manner.

| and, where appropriate, redesigned to take advantage of the development opportunities presented by e-Commerce in a safe, equitable and orderly manner. | generations of Code policy as appropriate. | on ‘bricks and mortar’. Planning should foster positive, functional and well-designed precincts to afford attractive, lively and convenient mixed use centres. |

**Discussion Questions:**

- *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 effective conversion of long term rentals into holiday accommodation via online platforms)?*

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

Planning can only monitor anticipate trends, with the key issue to allow adequate flexibility, but while control and manage external impacts, eg built form, financial equity, liveability etc. 

Major influence on retail, business, manufacture and transport. Still fundamentals of local community access to services, goods and personal experience, and may be resurgence to ‘local, accessible and sustainable’ practice.

* The three types of recommendations and their associated proposed timing.

<table>
<thead>
<tr>
<th>Transition ready</th>
<th>Current policy that requires minimal change and will be transitioned into the first generation (July 2020) of the Code Policy Library (Transitional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reform (Gen 1)</td>
<td>Current policy that is recommended for improvement before it is transitioned into the first generation (July 2020) of the Code Policy Library (reform which is minor based on research and engagement which is already well progressed or underway)</td>
</tr>
<tr>
<td>Reform (Gen 2 and beyond)</td>
<td>Gaps within existing policy that require further research and discussion before they can be considered for inclusion (Second generation and beyond) of the Code Policy Library (Reform in a new area)</td>
</tr>
</tbody>
</table>