22 February 2019

The State Planning Commission
GPO BOX 1815
ADELAIDE
SA 5001

Dear Sir / Madam,

RE: PRODUCTIVE ECONOMY POLICY DISCUSSION PAPER

Thank you for the opportunity to provide feedback on the State Planning Commission’s Productive Economy Policy Discussion Paper.

Adelaide Plains Council (APC) is generally supportive of the initiatives and matters raised in the paper. Comment has been made on a range of issues with a particular focus on those matters that have a direct relevance for APC. This includes primary industry and the Adelaide Plains food bowl, economic development, employment and industrial lands, tourism; and, main street development.

APC provides the following feedback in relation to the specific questions put forward in the discussion paper:-

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?*

Within the planning system, APC recognises the continuing benefits of the retail hierarchy and activity centres policy in guiding urban development, which provides certainty for both government and the private sector for investment as well as protecting the traditional main street from out-of-centre development.

Sufficient land needs to be made available for a range of retail and business uses, including expansion of existing premises. The right mix of businesses in a centre can create a sense of vibrancy and attract people to live, work and visit. Restricting residential development from ground floor units, particularly in regional centres, will protect town centres from losing their primary function. Planning policy that allows flexibility in relation to changes of use within a
centre, providing these are deemed suitable for a retail/business centre location, should be encouraged. More flexibility on temporary planning consents could encourage pop up shops to fill vacant units.

In relation to levers outside the planning system, decreasing the percentage on recourse loans associated with self-managed super funds will act as a stimulant to retail investment.

In addition, setting requirements for business advisors to have run a business in the last 4-5 years will help ensure that the advice provided is reflective of modern business practices.

Councils should be encouraged to sign up to the Small Business Friendly Council (SBFC) and implement initiatives that support local small business and improve the operating environment for such businesses. The establishment of a Business Council or Business Development and Innovation Committee, which is industry led but in strong partnership with local government and other relevant stakeholders, could help drive economic development and infrastructure initiatives and identify potential projects to create opportunities for business growth and innovation.

**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?*

A range of employment lands both in size and location needs to be provided that can be protected from encroachment by incompatible development. This includes office and professional services to Urban Employment Zones/light industrial and commercial uses to heavy industrial uses. Each have differing locational needs and impacts from only access and car parking up to significant noise and air quality concerns as a result of a heavy industrial use. Sufficient land needs to be made available for such uses. Low impact employment uses can be located in mixed use areas but there should be percentage limits on the amount of residential use that can occupy such areas to ensure that adequate employment land remains available.

Appropriate planning policy in the Planning and Design Code together with targeted zoning will be required to achieve this, including a focus on the delivery of supporting infrastructure. Increased flexibility in relation to changes of use i.e. allowing a range of like industries to occupy a unit in succession without the need for planning consent, together with more flexibility in relation to temporary uses e.g. for short term start-ups, will help keep units occupied during market downturns.

Infrastructure works, including the provision of power, water and gas, need to be proactively planned for, taking into account the cumulative impacts of development. Setting triggers via an Infrastructure Scheme or developing a specific industry fund based on employment figures are potential options for addressing this issue.
1.1 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?

Interface issues are a key concern for peri-urban Councils such as APC which have a number of competing land uses in close proximity to one another and ongoing issues with the encroachment of residential uses onto primary production land.

Guarding against issues such as aerial spraying, noise and dust provides sufficient justification for including a 40 metre interface buffer between rural and residential uses. For consistency and clarity, it would be preferable for any set interface buffers to correspond with PIRSA setbacks, with relevant links in the Code to achieve this.

Different types of primary production result in different types of interface issues e.g. broadacre vs enclosed horticulture. A smaller buffer may be acceptable in some circumstances if there is appropriate justification. However, it is important to ensure that new development does not detrimentally impact upon the normal day to day activities (including chemical spraying) of established uses on adjoining land. Any lesser distances below the 40 metre standard buffer should therefore be performance assessed.

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

APC’s Primary Production Zone and Horticulture Policy Area have recently been reviewed through the Northern Food Bowl Protection Areas Development Plan Amendment and together with the Environment Food Production Areas (EFPA) legislation, it is considered that the current guidelines are appropriate. However, there may be a need to ensure consistency with adjoining Council areas such as Light Regional Council and Playford Council with regard to the Northern Adelaide Irrigation Scheme (NAIS) area.

Subdivision and minimum allotment sizes in primary production areas should be regularly reviewed to ensure that they correspond with both the tenets of supply and demand and the strategic objectives for such areas.

1.2 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?

Wayfinding and information signage forms a key part of the legibility of places and the tourism industry. Where are businesses and attractions and how do you get there?
A proliferation of third party advertising hoardings can create a visual blot on the landscape which acts as a distraction to road users. However, appropriately designed gateway signage can be the lifeline for small regional communities and their settlements, which are currently disadvantaged if their main access is off an arterial route and it is inadequately signed.

Port Wakefield Road bypasses the township of Two Wells and there is currently a lack of signage to encourage travellers to stop. Signage based on the facilities/services available rather than specific businesses is supported (e.g. bakery, butcher) as is attraction based signage (e.g. ‘historic wells trail’). While advertising a particular brand or business could be justified, there should be no allowance for sales marketing (e.g. ‘50% off’/ ‘bargains on offer’).

APC would support a review of the current approach to standard tourism signs, with consideration as to whether there is scope to enable a more innovative approach. There may be potential to enlarge the signs, make them more appealing e.g. incorporate public art, sculpture etc. and/or increase their content.

Signage needs to be locational and undertaken jointly with State Government, local Councils and third parties.

**Linking People to Jobs, Goods and Services**

**2.1 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?*

Yes, APC supports the continuation of the centres’ hierarchy. The hierarchy plays a key role in guiding urban development. It enables the clustering of services and facilities in particular areas which, provided they are well distributed and conveniently located, can reduce travel, enable the concentration of infrastructure and provide the required support for residential populations.

The retail hierarchy protects the status of main streets and reduces urban sprawl by clustering services and facilities in suitable locations. There should be some flexibility for a small allowance of retail or other businesses outside of centres to support local populations but this should not result in competition with the traditional main street.

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

In large centres where there is land available, which is unlikely to be used for retail/business development, residential uses can add to the activation and vibrancy of a centre. However, in smaller townships, residential uses should never be allowed at ground level as once these units are lost, they are rarely returned to an active use. Residential uses at ground floor level reduces the potential options for businesses and retail units and can result in the deterioration
of a small centre, disadvantaging the primary function of the centre. Apartments above commercial uses or other residential to the rear of main streets where rear loading (laneway) access is available (such as in Two Wells) is supported in smaller centres, subject to the consideration of interface issues.

2.2 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 a land use genus, impact and design focus, rather than strict land use definitions?*

The existing Urban Employment Zone (UEZ) from the SA Planning Policy Library appears to already meet this criteria. The UEZ is “*a mixed use employment zone that accommodates a range of industrial land uses together with other related employment and business activities that generate wealth and employment for the State*”.

Zones dedicated to heavier industrial uses, which have a greater propensity for creating interface issues should still be maintained but many existing light industrial areas would be suited to conversion to the more flexible UEZ. Ensuring appropriate infrastructure (including energy) is provided in these locations remains crucial.

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

Height and setback requirements with UEZs, particularly where allotments or units are not visible to a public road frontage (i.e. core areas) should be given some element of flexibility based on use and impact. However, stricter controls should be maintained on boundaries between adjoining uses to minimise interface issues and to retain a reasonable level of visual amenity.

2.3 Home-based Businesses

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

The provision of appropriate IT and telecommunications infrastructure will be key as more remote working opportunities develop.

The definition for a home activity could be made more relevant to rural areas by amending the floor area allowance for the home activity usage. For example, 30 square metres may be considered a generous floor area for an urban allotment but not on a large 40 hectare rural allotment. Could the home activity definition allow for a % of the allotment to be used based on its size so that the definition is more flexible and less urban-centric?
Providing Infrastructure to Enhance our Liveability

3.1 Renewable Energy

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

Planning has an important role in enabling all forms of energy infrastructure and the provision of sustainable, reliable and affordable energy options is vital for meeting the needs of key services. Renewable energy options should not trump all other considerations – particularly when it comes to visual appearance and the protection of amenity values. In relation to wind farms, solar farms and solar panels, visual amenity is the key concern. There are numerous examples of solar panels on top of heritage buildings which detract from the character of the building and streetscape.

3.2 Adaptive Reuse

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

No. This is precisely why the Environment Food Production Areas (EFPA) legislation was created – to protect primary production lands from turning into rural living blocks.

While the actual reuse of a farm building for a non-farming use may be justifiable in some circumstances, this does not require the sub-division of the land to occur. Once the house is cut off, this starts to fragment the primary production land and a new dwelling can be built on the remaining land (as a manager’s residence or caretaker dwelling). Allowing farm houses to be separately titled is creating a loophole to allow rural living on primary production blocks in direct conflict with the EFPA.

By all means provide allowance for the farm building to be used to facilitate an economic activity but do not allow the building to be separately titled to achieve this.

Facilitating Innovation and Enabling Investment

4.1 Collaboration and Clustering

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

Flexibility on land use and allotment size within particular zones will enable innovation and investment opportunities. Urban Employment Zones can perform this function to a certain extent, particularly within more regional areas.

Funding key infrastructure for such areas will be necessary to ensure that new businesses are both easily accessible and appropriately supported with regard to IT and telecommunications.
How do we ensure that residential development does not monopolise the offering in mixed-use areas of innovation districts?

Restricting residential development at ground floor level will help retain an active street frontage and help promote the primary function of innovation districts.

APC looks forward to further engagement opportunities with the State Planning Commission and DPTI throughout the transition to the new PDI Act.

Should you require any further information from Council or have any queries regarding this consultation submission, please contact me on (08) 8527 0200 or info@apc.sa.gov.au

Yours sincerely,

Megan Lewis
Planning Policy Officer