Dear Sir / Madam

State Planning Commission’s Discussion Papers on the Productive Economy – for Consultation

Council wishes to thank the State Planning Commission for the opportunity to comment on the Commission’s Productive Economy Discussion Paper. It is acknowledged that the objective of this Discussion Paper is to recommend policy directions to inform the development of the draft Planning and Design Code.

The City of Charles Sturt has taken the opportunity to consider the Discussion Paper. A copy of Council’s specific comments on the Papers is provided in the attached document (refer to Appendix A).

Thank you once again for the opportunity to provide feedback on the above Discussion Paper. Council looks forward to the opportunity to review the Commission’s final Discussion Paper on ‘People and Neighbourhoods’ when it is released for consultation and ultimately the draft Planning and Design Code during the implementation of the Planning Reforms.

Please don’t hesitate to contact Jim Gronthos on 8408 1265 should you wish to discuss this matter in further detail.

Yours sincerely

Paul Sutton
Chief Executive Officer
### Appendix A

#### Productive Economy Discussion Paper

<table>
<thead>
<tr>
<th>Page Reference</th>
<th>Comment</th>
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</table>
| Page 22 (local business incentives) | The notion of incentives to businesses to assist in their growth is supported in addition to a flexible policy approach. The City of Charles Sturt has developed a number of initiatives through its Urban Projects portfolio to assist local businesses. These include:  
  - Small business support – Council has signed up to the Small Business Commissioner’s *Small Business Friendly Council Charter* which offers a range of services.  
  - Member of the Western Business Leaders.  
  - One on one advice for small businesses.  
  - Westside Place Makers Grants.  
  - Main Street Trader Grants.  
  - Place makers Business Attraction and Improvement Fund. |
| Page 39 (adaptive reuse of buildings) | This is supported from a sustainability position and conservation position for the preservation of the City’s historical built form. Consideration should be made in the draft Code to include specific references to State and Local Heritage Places and buildings within established Historic Conservation Areas. |

### 1.2 Tourism

<table>
<thead>
<tr>
<th>1J</th>
<th>Tourism is important for the State’s economy and therefore it is important to continue to encourage and support its growth.</th>
<th>Refine and transition the policy intent of SAPPL Tourism Development General Module policy.</th>
<th>Agree. Council will review the proposed policy intent through the consultation process of the draft Code.</th>
</tr>
</thead>
</table>
| 1K | It is important to strengthen and provide greater certainty to tourism, including 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 | The City of Charles Sturt contains two residential/caravan parks. These include a portion of Adelaide Shores and the Adelaide Beachfront Tourism Park. The current Charles Sturt Development Plan does not contain general section policy from the SAPPL which relates to residential parks and caravan and tourist parks. The implementation of the draft Code should address this. |

Our ref. 18/376503
Discussion Questions

Signage policies
Do not agree with the need for facilities for third party advertising. There is scope for more tourism signage to promote tourism and regional assets, points of interest and experiences.

Discussion Questions: How could a more coordinated metropolitan staging program be achieved which provides greater certainty to all stakeholders and assists with more orderly development? + Does policy regarding subdivision and minimum allotment size need to be reviewed and strengthened?

To help achieve the target in The 30-Year Plan for Greater Adelaide – 2017 Update of containing the vast majority of new housing to established areas, the current pattern of subdivision and staging needs to be reviewed to ensure new dwellings and transformation of suburbs are affordable and liveable. The current infill pattern is piece-meal and some negative impacts include a reduction in open and green space and permeability and increasing the urban heat island effect, which have health and liveability impacts.

Greening the Greyfields is an example of a model that has been developed to create better outcomes for infill development. It is based on rigorous research, economic feasibility and is currently being trialled in Victoria¹.

It proposes that lot consolidation and certainty can be encouraged through planning provisions with planning policy that outlines the environmental and social outcomes to be achieved to bring about the desired community benefits, while being economically feasible. This allows for a coordinated approach and identification of the benefits that are required in a certain location.

The AdaptWest, Western Adelaide Region, Climate Adaptation Plan² identifies the following planning policy considerations for immediate implementation to prepare for and respond to climate change that relate to subdivision.

Business and Industry: With available and new information from modelling, adaptation for business and industry needs to focus on using planning policy and design techniques to manage new development in areas at risk, such as low-lying sites in close proximity to Port Adelaide’s Inner Harbour. Such planning will reduce the risk to business and industry as sea level rises in the future and rainfall intensity increases.

Natural landscapes – coastal: Amend land use planning policy. Major infrastructure projects and land division associated with projects including the Northern Connector and salt fields residential development, should consider how to protect local coastal assets and tidal wetlands that will be part of the Adelaide International Bird Sanctuary.

1.3 Mining and exploration

Discussion question

Protection of mineral resources
Agree that undeveloped mineral resources should be protected from urban encroachment and incompatible development where they are significant and valuable deposits.

## Theme 2: Linking People to Jobs, Goods and Services

### 2.1 Centres, retail and mixed use activities

<table>
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<tr>
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<th>Comment</th>
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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>Agree. Council will review the proposed policy intent through the consultation process of the draft Code.</td>
</tr>
<tr>
<td>2B</td>
<td>Promote mixed use zoning and flexible policy to support innovation, growth and diversity to provide for changing</td>
<td>Review and transition the policy intent of SAPPL mixed use zones.</td>
<td>Agree. Council will review the proposed policy intent through the consultation process of the draft Code.</td>
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<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 or 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>Agree to the review of retail policy. It should maintain centres and nodes as focal points for activity. They are easier to service for public transport and to concentrate activity for creating a sense of place and community.</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 the policy intent of the SAPPL Bulky Goods Zone into a broader zone option.</td>
<td>The Charles Sturt Council contains a Bulky Goods Policy Area within its urban Employment Zone. These locations are typically the fringes of the Urban Employment Zone adjacent to arterial road networks where they have access to passing traffic. The drafting of the Code should consider this approach which has served as a good model for the City of Charles Sturt.</td>
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### Discussion questions

**Retaining centres hierarchy**
Agree that it is relevant today however, a State-wide strategic review needs to be undertaken to provide strategic direction on the future of centre hierarchy’s in context to the roll-out of increasingly...
mixed use zones which encourages retail and commercial uses outside of these centres.

**Residential Development in Centres**
Agree that it should be facilitated as shop top housing and upper floor apartments in centres.
Residential development should not be promoted at ground level to maintain active frontages and vibrancy in centres.

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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 to reflect changing industry trends.</td>
<td>Review, consolidate and transition intent of SAPPL industry and commercial zones to respond to changing technologies and markets.</td>
<td>The City of Charles Sturt recently amended its Development Plan to replace the former Industry Zone with an Urban Employment Zone from the SAPPL. The Urban Employment Zone contains policy which provides greater land use flexibility in the Zone including a main road commercial policy area along the fringes of the zone to provide greater commercial flexibility. The City of Charles Sturt would anticipate the introduction of the new Code to maintain as a minimum the policy setting currently experienced in the Urban Employment Zone for Charles Sturt.</td>
</tr>
<tr>
<td>2I</td>
<td>There is increased pressure on industrial lands and economic viability of industries through encroachment 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>The draft Code should ensure employment zoned areas is maintained in strategic locations supported by appropriate transport systems and infrastructure and protected from encroachment by incompatible development. Employment lands need to be provided in strategic locations to reduce the need for people to travel to work and access services. A Metropolitan-wide Employment Land Strategic Review needs to be undertaken on a regular basis to understand and provide strategic direction on employment land supply/demand to inform future policy planning decisions.</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,</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>Ancillary accommodation should only be permitted in Employment Zones in regional areas associated with defence and mining operations. It is not appropriate in metro setting other than care-takers accommodation. The Charles Sturt Council Urban Employment Zone deems dwellings as a non-complying form of development.</td>
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</table>
| accommodate for truck drivers, on site managers, business owners and other workers. | except for:  
Except for:  
(a) short term accommodation that is ancillary to and in association with industry  
(b) minor alterations and additions to existing dwellings  
(c) a caretaker’s residence.  
The Zone recognises the need for short-term accommodation to support some industrial land uses. As an inner-City Council some of the City’s existing Urban Employment Zones also contain historical residential land uses. While further residential land uses are not envisaged the policy recognises the need for residents to be able to alter or extend their existing dwelling to accommodate changing lifestyles. | 2K 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. | Identify and improve zoning that supports industry and commercial clusters. | Agree to identify and improving zoning/policy that encourages a wide range of employment uses to facilitate clustering. |

**Discussion questions**  
*Flexible approach to land use in non-res zones*  
Agree but needs to restrict sensitive land uses that can impact on employment uses ie residential
### Discussion questions

**Changes to work place practices and impact on planning system**

Planning system needs to be more nimble to respond to changes in work practices in the future.

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**Theme 3: Providing Infrastructure To Enhance Our Liveability**

### Key opportunities and challenges

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<tr>
<td>3A</td>
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**Discussion question: How should planning policy respond to growth in renewable energy – what issues should be addressed?**

Planning should facilitate the development of shared local renewable energy systems such as micro-grids and larger scale local renewable energy installations to reduce network and consumption costs of electricity.

The AdaptWest, *Western Adelaide Region, Climate Adaptation Plan* identifies encouraging growth in decentralised energy generation and storage as an immediate priority adaptation option.

Review of the opportunities could include coordination with electricity distributor to identify areas with network constraints where micro-grids and local energy generation would reduce costs/need for network upgrades and could be encouraged through planning policy.

It could also be assisted by identifying sites that would be suitable for local larger scale solar energy projects for areas with limited uses, such as closed landfill sites and transmission line easements. This may assist development of these projects, in particular when led by local communities, businesses or local governments.

This could enable economic (reduced upgrade and operating costs), social (improved energy reliability and household costs) and environmental benefits (reduced carbon pollution and energy losses) and help attract investment and build capacity.

### 3B Adaptive reuse

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**Ref No.**

**3A**

**Discussion question**

**Comments**

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*Our ref. 18/376503*
or character properties that contribute to the amenity of an area.  

| Consideration in the draft Code to include specific references to State and Local Heritage Places and buildings within established Historic Conservation Areas. |

**Discussion question**  
**Farm house adaptive reuse**  
Agree provided that they do not impact on the viability of existing and future farming activities. They can provide a value add to produce that is grown on farms in the local area and provide valuable tourism and visitor assets.

### 3.3 Infrastructure

| 3D | 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. | Review and transition infrastructure-based zones to provide improved consistency. | Agree. Council will review the proposed policy intent through the consultation process of the draft Code. |
| 3E | It is important to provide clear direction in regard to appropriate separation distances for infrastructure such as waste water treatment plants and power generation facilities. | Review separate distances for infrastructure (e.g. utilities) and identify opportunities for appropriate uses within buffer spaces. | Agree. Council will review the proposed policy intent through the consultation process of the draft Code. |

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

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<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>Agree with proposed response.</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)</td>
<td>Review and refine SAPPL policies that support and encourage the adoption of emerging technologies and ensure flexibility to</td>
<td>Agree with the proposed response. The Charles Sturt Council Development Plan contains an Urban Employment Zone with local policy variation that encourages a flexible range of employment land uses including high-tech, bio-tech, research and</td>
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</table>
which potentially allow for a mix of uses in residential and business zones. accommodate future ones in land use design and development. development. The draft Code should consider a broad range of employment uses in future zones to provide flexibility.

Discussion question
Monopolisation of residential development in mixed use zones
There is a need to create precincts where residential development is restricted will allow employment uses to establish.

Key trends influencing change
The low-carbon and circular economy (p15)

The low-carbon circular economy is noted on page 15 of the Productive Economy Policy Discussion Paper. Further discussion on this topic is missing from the policy conversation section of the paper, but should be included. Planning could contribute to this in a number of ways.

• Support jobs growth in the circular economy through planning support for the reuse and recycling of demolition and construction materials. Similar to ensuring that the construction and demolition phase of a development does not negatively impact our waterways, reuse and recycling targets should be specified in construction management plans.

This would also assist with achieving the waste objectives and principles in planning and South Australia’s Waste Strategy construction and demolition landfill diversion targets and could be supported by existing training, such as the KESAB Clean Site Program. This may also provide support for more companies to establish voluntary take back programs (such as voluntary take back for some carpets).

• Review and strengthen planning policy to encourage co-location/clustering of business types to support resource sharing and material reuse.

• As ‘knowledge and creative industries’ is one of South Australia’s competitive advantages and construction a significant contributor to employment, planning can help create growth in this area through sending a strong sustainability and innovation signal through planning. This will help grow the demand and expertise in environmentally sustainable design and construction services in South Australia.

• Planning policy to support and require low carbon outcomes. The economic benefits are identified in modelling undertaken by the National Institute of Economic and Industry Research (NIEIR)⁴. This indicates that if supported by strong federal policies for carbon reduction, jobs in South Australia could grow by almost 30,000 by 2030, with highest growth in the construction sector through energy efficiency for homes and industry and public transport and electric vehicle infrastructure.

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⁴ www.acf.org.au/strong_climate_policies_mean_million_new_jobs