22 February 2019

State Planning Commission
PO BOX 1815
ADELAIDE SA 5001

Via email: DPTI.PlanningEngagement@sa.gov.au

To whom it may concern,

RE: Response to Productive Economy Policy Discussion Paper

Thank you for the opportunity to provide a submission on the Productive Economy Policy Discussion Paper (the Paper). Please find enclosed a copy of the City of West Torrens submission incorporating general feedback and direct responses to questions raised in the Paper.

Council Administration welcomes the opportunity to provide comment and understandably, has a keen interest in the themes contained within the discussion paper, having recently employed a full time Economic Development Planner to aide in the City of West Torrens Economic Development Strategy and further enhance council's alignment with the Building Western Adelaide Alliance, Western Business Leaders and State Government strategies.

While the introduction of the amended objectives in the PDI Act 2016 and the impending Planning and Design Code present an unprecedented opportunity to advance development in this state, this Discussion Paper appears to reinforce the role of the planning 'system' as a "development assessment system" rather than a genuine facilitator of development and economic productivity.

Council has multiple interests in ensuring a productive economy, as an advocate on behalf of community and business, facilitator bringing businesses together, partner with Adelaide Airport and other major industry and employment providers in the City of West Torrens locality, and service provider/property owner seeking to maintain and improve the value of land in the area.

As an advocate on behalf of the community, Council has a role to appeal to other levels of government to achieve best practice approaches that facilitate a thriving business environment and foster a vibrant and inviting city, in line with the community's 'city prosperity' aspirations reflected in the Community Plan.

Council's 'city prosperity' progress indicators include employment diversity, business type diversity and visitor perception. It aims to identify and promote the distinctive identity of West Torrens, which the new planning system appears intent to erode.
Ideally the state government would have engaged with councils to identify opportunities to enhance and augment business through improved infrastructure projects, and understand the makeup of industries and possibility of economic clusters within each council or region (e.g. Western Adelaide) which would be of economic significance to the State to inform the formulation of an adaptive and responsive Code.

Generalised and sweeping Code formulation is likely to result in unintended consequences that miss opportunities to create new jobs and develop emerging industries and stifle entrepreneurial culture and neglect South Australia's global connections. The compressed timeframe for the implementation of the Code also means that it is unlikely that current and meaningful research will inform the new planning system.

At a time when bank lending is likely to be less readily available for development, the planning system needs to be more nimble to adapt to changing circumstances and opportunities as they arise. But it must do so in a way that considers the local context and ensures relevant stakeholders have adequate opportunity to provide input.

Please refer to the attached submission and should you require further information or would like to discuss this submission, please contact Sue Curran, Manager Strategy and Business on [contact information]

Yours sincerely,

Terry Byss

Chief Executive Officer

City of West Torrens

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West Torrens Council Productive Economy Policy Discussion Paper Submission
Productive Economy Policy Discussion Paper Submission

City of West Torrens Submission on
Productive Economy Policy Discussion Paper, Released November 2018

The City of West Torrens appreciates the opportunity to provide feedback on the Productive Economy Discussion Paper developed by the State Planning Commission and DPTI.

The West Torrens Council area presents a highly desirable location for business and employment due to its proximity to the Adelaide CBD and high level of road, rail and air transport accessibility. The city has more jobs within its boundaries than residents in the labour force, meaning there is a net inflow of people coming into the City of West Torrens each day to work.

Adelaide Airport is the largest single employment base in West Torrens, and indeed, South Australia, employing around 8,000 people. Adelaide Airport and surrounds provide considerable retail and commercial activity which are assessed outside of the state planning system. This presents some challenges for planning in the Western area, and ideally there would be better mechanisms to integrate, or at a minimum, recognise, planning for federally-controlled land within the state planning system.

Council recognises the following key future challenges for economic productivity within the City of West Torrens:

- The promotion and retention of key employment precincts to meet the needs of the growing population.
- Ensuring policies and processes are business-friendly, in order to attract and develop an appropriate range of business, both small and large to future proof the economy of the state.
- Facilitating sustainable population growth (which may include appropriately skilled migrants) within environmental and social constraints.
- The emergence of new technologies is also recognised as a key influence in the changes to traditional manufacturing in the area.

City of West Torrens aspires to a thriving business environment that encourages economic growth and prosperity and fosters a vibrant and inviting city.

The objects of the Planning, Development and Infrastructure Act 2016 are to,

"...support and enhance the State's liveability and prosperity in ways that are ecologically sustainable and meets the needs and expectations, and reflect the diversity of the State's communities by creating an effective, efficient and enabling planning system, linked with other laws...."

Also of particular note is the intention to

"...promote cooperation, collaboration and policy integration between and among State government agencies and local government bodies.

The following response to questions posed in the consultation documents reflect the objects expressed in the Act, and highlights that greater consideration is required of the ways in which the provisions of the PDI Act 2016 link with other laws (such as Urban Renewal Act 1995 and Local Government Act 1999) to create a cohesive Development System, that supports economic prosperity, in its entirety.
Metropolitan Growth Management:
How could a more coordinated metropolitan staging program be achieved which provides greater certainty to all stakeholders and assists more orderly development?

There are many examples of metropolitan growth management nationally and internationally, staging programs typically review core issues including access to affordable housing, suitable employment, infrastructure, and services; managing growth within environmental constraints; and the political management of common community concerns around urban diversity and consolidation.

Staging programs typically identify areas for uplift in the short term, areas that are seen to be ready for policy augmentation because of their location and proximity to public transport networks and infrastructure. Alternatively, additional investment in public transport or infrastructure can act as a catalyst for development or redevelopment in newly serviced areas.

In the context of metropolitan growth management and productive economies it is clear that there is a need for clear strategy and goals regarding what is sought through the planning system and planning policy, such as the 30 Year Plan for Greater Adelaide, which seeks to:

1. Containing our urban footprint and protecting our resources:
   - 85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045
   - 90% of all new housing in the Outer Greater Adelaide will be built in established townships and designated urban development areas by 2045

2. More ways to get around
   - 60% of all new housing in metropolitan Adelaide is built within close proximity to current and proposed fixed line (rail/tram/O-Bahn) and high frequency bus routes by 2045.

3. Getting active
   - Increase the share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide by 30% by 2045

4. Walkable neighbourhoods
   - Increase the percentage of residents living in walkable neighbourhoods in Inner, Middle and Outer Metropolitan Adelaide by 25% by 2045

5. A green liveable city
   - Urban green cover is increased by 20% in metropolitan Adelaide by 2045

6. Greater housing choice
   - Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045

Australia's distinctive pattern of settlement has long presented a suite of social, economic, infrastructural, and environmental challenges. Adelaide is well documented as being a low density city, which has traditionally accommodated its growth with fringe development and satellite cities. Out of this built form arises community expectation of large backyards, car ownership and subsequent car dependency. There is a clear role for a program of education and community awareness to run parallel to the planning reform process, which will take time and may require generational change.

Whilst the above targets and rationale for these are widely understood amongst those in the built environment industry, this is not clearly relayed to the wider community. In increasing density and land use diversity, it is evident that an education program around these targets and the rationale for uplifting density and creating a more mixed use form needs to be clearly expressed to everyone including key community figures.
Sensitivity also needs to be extended to metropolitan areas that communities have identified as having character value and high levels of amenity, that due to their low density are unlikely to be replicated into the future. Such areas require robust policy with regard to height and massing at the interface between existing and proposed higher density development. Protection is required for existing character and low density areas which are appreciated by existing residents.

There is a pronounced need to balance the objectives of the urban development industry and the actual day to day experience of liveability of the housing created, with the desires and expectations of those residents in surrounding existing housing.

Community members have a tendency to ignore planning until planning 'happens to them' by way of a development that does not meet their expectations for the area in which they live, work or play. This is not an acceptable strategy and a metropolitan staging program would be far more palatable if the reasoning was clear and promoted more effectively in the same way speed limits, water use, health checks/screening, and other initiatives are promoted to ensure the benefits are understood more broadly in the community e.g.:

- Locational disadvantage - first home buyers can buy/rent close to support networks, education, employment rather than move to an isolated and often poorly serviced outer fringe suburbs;
- Environmental impacts- fossil fuel dependency reduced through walkable neighbourhoods, reduction of productive lands, water resilience;
- Economic benefit- improved public transport, financial gains through ensuring the right skills and workforce are available.

The three tiers of Government have undertaken a great deal of research and policy formulation but fall short of bringing the community along for the ride and then often fail to engage and implement the hard and soft infrastructure necessary to maintain and support increasing densities. There is opportunity for better collaboration and partnering between the levels of Government. A 2011 paper authored by McGuirk & Argent speaks to the interconnected nature of demographic change in Australia's settlement system and the questions that these pose for urban and regional governance:

"Densification has been challenged on the basis of impacts on liveability, affordability and equity, and the loss of biodiversity, water catchment and food production capabilities, whilst, popular anxieties have solidified more so around the anticipation of stressed services, congested infrastructure, loss of urban character, loss of open space, environmental amenity and liveability

Legitimate public anxieties are only likely to be assuaged by substantial and up-front investment in the physical and social infrastructure and services necessary to support densification, provide public collective amenity as a trade-off for the private amenity characteristic of low density suburban form, and absorb increased usage and growing demand. But the lack of integration of higher density development with public transport and social infrastructural improvements and new investments thus far has contributed to poor public confidence."

To this end, the 'State of Australian Cities' report highlights that the productivity of cities is affected by many factors, including efficiency of infrastructure, connectivity between businesses, people and their skills, ideas, goods and services, liveability and community wellbeing. The most resilient economies are those in which its residents feel they have a stake economically, politically, and socially. Therefore broader factors such as liveability and governance become important contributors to economic development.
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?

- Recognition of a significant de-evolution of retail to online shopping and delivery which may negate traditional parking requirements and requires consideration of new design-thinking to include click n' collect parking spots and possible drive-through collection, and accommodating more outward delivery truck movements.

- Consider regional warehouses of the type and scale required for trend toward mass warehousing and distribution networks associated with online shopping and delivery.

- Ensure a careful balance between support for multi-national vs local business.

- Support small business (including family businesses) to be more effective and sustainable; consider fee exemptions for SMEs and start-ups for temporary short-term approvals.

- Consider electric car charge points in shopping centre car parks.

Opportunities exist for entrants by way of existing zoning, however, evident within the City of West Torrens and with regard to the Urban Corridor Zone, is a lack of uptake on street level commercial use. Market forces are not yet providing the financial gains developers are seeking, with some economic professionals suggesting that horizontal mixed use is more economically viable than the vertical mix of uses envisaged in Urban Corridor (and similar) Zones. A horizontal, rather than vertical, mix also assist to ease challenges regarding competition for space at ground level for access, parking and waste collection.

State Government may consider incentives including supply subsidies (e.g. developer assistance, capital grants, fast tracking development assessment and approvals) and demand subsidies (e.g. stamp duty rebates, deposit assistance, rental assistance for developments that provide ground floor retail/commercial use).

However, if government funding is considered, mechanisms should be put in place to prevent or mitigate situations such as the 'Masters homeware stores' example in which government provided considerable funding to a company which was then bought out by a larger parent company, and the stores subsequently never opened or closed soon after construction, thereby never fulfilling the promised tax-payer funded jobs.

Other opportunities to actively encourage new entrants and investment include:

- Identifying catalyst sites and opportunity for land owners to become aware of the opportunity their sites represent.

- Working with Local Government to establish visions aligned to communities' aspirations that visually articulate what areas may look like in 2030-2040 for use in publicity and direct promotion with developers.

- Opportunities exists to compile potential local and foreign investors who may be interested in investment opportunities within the State and market directly and raise awareness of sites advantages.

- Public realm investment plans, highlighting streetscape and place making that will occur to encourage development and investment.
How do we harmonise planning objectives for an efficient pattern of settlement at the metropolitan level with the need to encourage investment in new retail facilities?

Council recognises the benefit of undertaking a review of retail policy, however this needs to be underpinned by current research and analysis. Paramount to the theme of linking people to jobs, goods and services is ongoing research and review of this sector and continuing technological change.

The emergence of the service-station mini-mart has somewhat undermined the role of the Neighbourhood Centre Zone in the context of higher order centre zones (Capital City, Regional, District) and Local Centre Zones. To date a technical review of the West Torrens Development Plan illustrates that a number of centres either do not match the centre definitions contained and/or under-perform or may be more suited to accommodate alternate uses.

However a counter argument also suggests that future realisation of residential densities in these areas may assist to restore the viability of these walkable centres. Smaller scale retail facilities (that are not associated with fuel dispensing) have the potential to harmoniously coexist with residential development; noting that car parking, waste and, in some cases, noise, are issues that must be addressed.

Consequently, it is appropriate that all activity centres be reviewed using a process of retail and economic analysis to facilitate better decision making about the role and function of each centre. Council administration agree that analysis needs to include Bulky Goods Zones and retail developments that may be occurring out of zone e.g. retail development at Adelaide Airport.

Consideration to assess emerging land uses that may be 'undefined' e.g. doggy day care, 24hr gyms to formulate a Code that is adaptive and responsive to market demand, review of the floor areas as a non-complying trigger (seen to limit development) and inclusion of small scale change of use applications as complying development within centre zones should be explored.

There is opportunity for land registers to include various size holdings and infrastructure connections and a need to understand business needs e.g. land for distribution centres and/or head offices and key locations for business establishment for better marketing.

Due to the environmental cost of remediation and aesthetic impact of disused petrol-filling stations (and other integrated variations of petrol-filling and shop) measures could be developed that prevent unnecessary proliferation of such development in new residential locations, especially in light of the likely future shift toward hybrid and electric vehicles (which may mean less need for petrol-filling.)

Any proposal to further relax the rules regarding 'out of centre' development (especially in areas that predominantly consist of low density housing) should be viewed with caution. The impact on all stakeholders, not just the impact on business investment, will need to be carefully considered.

Economic and Industrial Land Utilisation/Emerging Industries:
How do we ensure that the new system helps to facilitate economic activity and provide adequate employment lands for current and emerging businesses and industries?

The development assessment system alone will not facilitate economic activity and is just one piece of a broader system which includes a variety of industries including the finance
Productive Economy Policy Discussion Paper Submission

and development sectors, as well as legislative mechanisms such as the Urban Renewal Act 1995 (precinct planning provisions) and mechanisms which allow for extra levies to be collected for Business Improvement Districts (BIDs).

Businesses that are part of a BID are required to pay an additional tax or levy in order to fund projects within the BID district's boundaries. The BID is often funded primarily through a levy but may also draw on other public and private funding streams. BIDs can allow a cluster of businesses to fund infrastructure, place-making or marketing projects that are beneficial to their collective, but may not be government or council priorities.

In the future we are likely to see a growth in industries that are less fixed in place with a tendency to be transient, mobile, or accessed virtually. However, some industries will continue to require allocation of land.

Council's role in reviewing their land supply and strategic directions through section 30 reviews (Strategic Directions Reports) and other master planning processes needs to become a feature of the new system. Currently there is no information how councils will feed local knowledge into any strategic planning - unless as a member of a Joint Planning Board preparing a regional plan. If the Commission is preparing a regional plan - how will councils be engaged?

This paper needs to consider Australia's international competitiveness to be as critical a problem, as is productivity. The paper should also have focused on more being done to understand competitiveness of our industry sectors in order to effectively position it within the growing countries in the Asian region. It is disappointing that the paper did not pay attention to strengthening Australia's position by discussing value adding and creating new jobs at the high end of productivity.

Further consideration is also required of South Australia's challenge over the next few decades to raise standards of living through economic growth. If we are to drive future economic growth we must continue to boost productivity and encourage higher workforce participation. Greater support and pathways are required for the individuals, businesses and organisations generating new products and services that create value. New and improved offerings, products or technologies create new markets, improve efficiency and lead to greater prosperity.

South Australia needs a system that facilitates new and better paying jobs in growing industries and supports existing industries to better compete on the global stage.

Transitioning to the Planning and Design Code

Supporting and growing key Industries

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?

Any buffer proposed should consider not only current site interface issues between rural and residential use but also how the rural site could be developed under the Code and what impact may occur if a reduced buffer has been implemented and the longevity and usefulness of the rural site and capacity to expand or change use.

Noting, the report is concerned by the prevalence for encroachment by single-use residential development on employment lands, if buffer distances proposed are below the minimum stated within the Code, this should trigger public notification.
**Productive Economy Policy Discussion Paper Submission**

In the context of the City of West Torrens, there are sensitive land uses immediately adjacent the Adelaide Airport which experience reduced amenity due to their proximity to the Adelaide Airport where intensification of the residential use may conversely impact on business expansion for the Adelaide Airport. Adelaide Airport comprises 20% of the Greater West Torrens land area and is a major employment node with estimates of 5500 jobs being a direct outcome from the Adelaide Airport including transport, postal and warehousing and air and space transport jobs.

The City of West Torrens has undertaken investigations into aircraft noise and public safety areas, with a major aircraft noise survey of residents and property owners, and responses to a draft of the Commonwealth Department of Infrastructure, Regional Development and Cities' release of NASF Guideline I- Managing the risk of Public Safety Areas at the End of Runways.

In much the same way as the State Government is considering buffers between rural and residential areas to protect employment lands, Council is of the view that it is the role of the State Government to incorporate Public Safety Areas and Australian Noise Exposure Forecast contours into the Planning and Design Code to protect employment lands associated with the Adelaide Airport.

To enforce a public safety area through a spatial overlay would reinforce the significant role that the Adelaide Airport plays in the state's tourism and export economy, and protect the longevity of valuable employment lands.

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

With respect to industry and employment lands more generally, adequate research needs to be undertaken to determine the appropriate allotment size based on existing and emerging needs and location. The State Government requires a clear understanding which is underpinned by sound research into what type of employment land is required in particular locations, and any size requirements of the intended uses.

Often within a development assessment setting, it becomes clear from market demand whether allotment sizes are too large or small through indications such as an influx of land divisions that propose subdivisions of a size which is assessed on merit under the current system, or minimal uptake or demand in a new industrial estate due to size.

Removal of minimum allotment sizes is not supported and unfounded strengthening of minimums is dubious - existing research needs to be reviewed and updated with strong current and relevant policy ensuing.

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?**

In the context of the State's economy, tourism is identified as a super-growth sector that will drive jobs and growth. Support to this sector should be given to help realise this potential, but not at the expense of the character of the State.

Policies which envisage proliferation of third party signage are generally not supported. Exploration of existing and emerging technologies to integrate mobile applications, digital displays, RFID and other wireless technologies rather than physical third party signage should be undertaken.
Outdated signage policies should be reviewed and policy that facilitates legible and cohesive wayfinding be implemented. This could be a mix of signage, maps, symbols, colors, plantings, strategic rest stops/amenities and other visual communications. Effective wayfinding should include points of interest, transport, accommodation and facilities whilst being accessible for varying abilities and languages.

Many council areas possess great examples of wayfinding, for example, the joint project between City of West Torrens and Department of Environment & Planning, ‘Adelaide Arrive’ in the early 90’s looked at creating a boulevard along Sir Donald Bradman Drive from Adelaide Airport, Keswick Terminal and the CBD. Visually creating a legible streetscape that imparts a high quality landscape, leaving a lasting impression for visitors arriving or leaving Adelaide that is welcoming and easy to navigate. One aim of this project was to reduce visual clutter, opening up clear lines of sight to the Adelaide Hills, CBD and other iconic views where possible, whilst reducing the number of billboards, signage and hoardings to create a ‘linear story’ through artworks, planting and a palette of colours and furniture.

It is understood that land use definitions are to be refined during Generation 1 of the Planning and Design Code, however, Council stresses the importance of West Torrens strategic location, noting Adelaide’s international airport and national rail service are located within the council area. The City of West Torrens would have liked to have seen more research and discussion questions around what planning can do regarding tourism and more opportunity to explore how the Code can help to promote various industry sectors that support tourism.

1.3 Mining & Exploration
Should undeveloped strategic mineral resources be identified and protected from urban encroachment and other incompatible development?

The previous State Government developed the Multiple Land Use Framework to deal with competing land interests- ideally this would be incorporated into the planning system. (Note at the time it was expressly stipulated that the Framework would not apply to development applications under the PDI Act 2016).

In the Framework the definition of ‘land’ was expanded to include the air above the land- in recognition of the interest that any airport transport routes may have in relation to what is proposed on ‘land’.

The Food Protection Areas and Character Preservation Districts are a step in the right direction. Similar boundaries could be considered to protect the economic powerhouse that is the Adelaide Airport from further residential encroachment.

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?

Response as per “How do we harmonise planning objectives for an efficient pattern of settlement at the metropolitan level with the need to encourage investment in new retail facilities?”

Out of centre integrated development including petrol-filling station and shop have served to erode the centres hierarchy. Furthermore, in West Torrens the presence of the Adelaide Airport land which is governed by Federal Government land use policies serves to reduce
the effectiveness of a centres hierarchy. There needs to be a better way to recognise what happens on Federal Government controlled land within the State Planning System.

A centres hierarchy has a role to play, however, recent (and impending) changes to major arterial roads may now effectively act as barriers to patronage, thus altering the logical catchment areas of particular centres, furthermore the impact of introducing mixed use zone corridors should be measured in a up to date review of the centres hierarchy.

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

Council administration envisages the possibility of residential development occurring within retail centres, understanding an increased population serves as increased patronage to the centre. Council advocates for inclusion of affordable housing and specialist accommodation that is located close to specialised services, transport, employment and facilities typically established in centre zones.

Residential development in centres could work well in scenarios where parking and waste collection challenges can be addressed. This could be particularly successful for households that do not require car parking when co-located with public transport options (thus eliminating resident parking issues). Large retail centres with extensive car parking may present hazardous urban heat island impacts for vulnerable residents, therefore consideration of additional requirements for green space provision for any centre that incorporates residential development may be necessary.

As a note, residential use to be contingent on commercial component, ensuring development control does not prioritise residential development at the expense of employment lands. The City of West Torrens Development Plan contemplates dwellings and residential flat buildings located above non-residential land use within the Commercial Zone, District Centre Zone, Local Centre Zone and Neighbourhood Centre Zone.

Design of residential development needs to provide appropriate treatments to ensure amenity for residents isn't diminished by mixed use. Further consideration of how the public realm is able to accommodate mix of uses and provide open space for the likely needs of population, siting of residential component could be subject to reconsideration.

Further exploration may be required of open space requirements and delivery to facilitate a higher density and address reduced private open space associated with medium to high rise living.

2.2 –Employment lands (industry, manufacturing and commercial)

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

Assessment must consider impact of built form when it does not meet the relevant provisions for assessment. In some instances there may be sufficient merit to warrant an approval of a greater building height and/or reduced setbacks when impacts on surrounding owners and occupants is on par with the impacts anticipated for development that achieves minimums expressed in the Development Plan. However, the impact from the built form further afield also needs to be considered.

The City of West Torrens is experiencing the impact of high rise development applications within the Urban Corridor Zone adjacent the Glandore Character Policy Area 24 which in some instances allows building heights of up to 32.5 metres. This creates a jarring backdrop that does not provide for transition and coherence between new and established areas that
the community have identified as having a desirable development pattern and built form reflective of traditional character elements.

Discussion around defining ‘core’ and establishing suitable buffers and transition policies to protect areas with an established urban character that community view as desirable is needed to provide certainty for developers and residents.

2.3- Home-based Business

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

On the back of recent loss of automotive manufacturing from the South Australia and potential closure of the steel industry along with unemployment and underemployment, is the need to create a diverse workforce that promotes flexibility, diversity and supports small business.

Recognising that many small businesses start as home-based businesses, City of West Torrens is supportive of a review of not only the Home Industry Zone (discussed later), but also the parameters of home based business, home based industry and the definition of home activity.

Whilst home activity is clearly defined within current regulations, the currency of this definition could be reviewed with the view to enabling more fluidity, encouraging entrepreneurship and home based businesses generally. The reform presents an opportunity to reconsider what does not require a development application by definition of home activity and how to better enable development of home based business within residential zones.

Under the current planning system some home based businesses are not considered to be appropriate for a Residential Zone and suggested to be more appropriate for commercial or industrial zoned lands due to prescriptive planning policy. The Home Industry Zone appears to be a good resolve to living and working on the same site and specifically accommodates land uses that may be considered of an industrial nature but still compatible with residential use e.g. small scale service industry and light industry.

This requires robust policy to ensure that the intent of the zone is reinforced and not encroached by single use developments that create nuisance or hinder other lawfully existing uses. Existing SAPPL policy is conflicted and on the ground, the land use is geared towards standalone light industry (stated as an envisaged use) and seeks to limit home based industry (e.g. floor area, car parking, and employee numbers) but does not limit other forms of envisaged use in the same capacity.

Whilst Home Industry is not in the City of West Torrens there is still a need to provide zoning that enables resident and light industry to exist in conjunction with one another. Council Administration is supportive of the State Government undertaking a review of home based industry and exploring how best to zone for this type of land use and provide policy that facilitates development outcomes consistent with the intent of the zone.

**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 policy must provide reasonable protection of people’s investment in solar panels, by providing a right to solar access.
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?**

The planning system should be current and reflect the ways in which people live e.g. multi-generational living on rural properties and agribusiness opportunities, notwithstanding the importance of maintaining allotments of a size and configuration that promote the efficient use of land for primary production and the conservation of native vegetation and natural habitats.

Is it a necessity to separately title a farm house to enable its reuse? As with all adaptive reuse, buildings need to be fit for purpose, the Code needs to better reflect the environmental benefits, combined with energy savings and the social advantage of recycling a place through reusing buildings as an essential component of sustainable development.

3.3- Infrastructure

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

The Development Assessment system needs to strike a balance between stability and flexibility while providing mechanisms that allow for swift improvements to ensure policy keeps pace with the expectations of the community and evolving changes in the economy.

It is noted that information regarding Infrastructure Schemes and Precinct Planning pilot projects have been posted to DPTI’s Learning Hub in early 2019 - however greater promotion and publicity of these mechanisms is required to ensure that councils understand the mechanisms available to them and how these link with the PDI Act 2016.

**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?**

Urban Renewal Act precinct planning mechanisms and other facilitators of development may be more appropriate to encourage innovation districts. The development assessment system can encourage or support these districts, simply by ensuring it does not add unnecessary red tape.

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

Formulation of policy that clearly delineates desired land uses and whether one land use is contingent/associated/ancillary on another land use. Where state government is a co-funder, funding agreements can be tied to the delivery of a specified ratio of commercial development to residential development.

4.2- E-commerce and a sharing economy

**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 conversion of long term rentals into short stay holiday accommodation via online platforms)?**

The Development Assessment system needs to strike a balance between stability and flexibility while providing mechanisms that allow for swift improvements to ensure policy keeps pace with the expectations of the community and evolving changes in the economy.
Further consideration of night time economy may be required to meet the changing demands of the community.

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

A trend toward a requirement for large distribution warehouses to accommodate online shopping giants is disrupting traditional "shopping" retail land provisions. Consideration of rezoning land in proximity to major arterials and the airport to accommodate this form of commerce may be required.

References
