



Town Planning
Development Advice
Strategic Management

10 December 2020

Mr Michael Lennon
Chair
State Planning Commission
DIT.PlanningReformSubmissions@sa.gov.au

Dear Mr Lennon,

Revised Planning & Design Code for Public Consultation – Submission on behalf of ISPT Pty Ltd – Charles Sturt Industrial Estate

As provided for, I make the following submission on behalf of ISPT Pty Ltd in relation to the revised Planning & Design Code released for public consultation, as such relates to their significant land holding at Port Road, Woodville otherwise known as the Charles Sturt Industrial Estate.

ISPT is one of Australia's largest investor owned property groups with a significant portfolio of property assets that support a range of commercial industrial, retail, logistics and warehousing businesses. In addition to developing these assets, ISPT is a long term owner of property.

The Charles Sturt Industrial Estate provides high quality, well located premises for a range of larger scale industrial, commercial and bulky goods retailing uses, as a coordinated and integrated redevelopment of this former General Motors Holden site at Woodville.

This Estate has been implemented in a staged manner, as guided by a Concept Master Plan developed in close consultation with the City of Charles Sturt (the Council). In its final form, the Charles Sturt Industrial Estate will have a value estimated to be in excess of \$100 M.

Given the value and strategic importance of this investment to the economy of South Australia, ISPT seek to ensure an ongoing ability to accommodate a range of advanced manufacturing and employment generating businesses, including that associated with the defense sector.

Critical to the long term success, is the ability to accommodate medium to large scale high intensity uses that require heavy vehicle access and the ability to conduct operations on a 24 hour basis. Current Development Plan policy clearly provides for this with the majority of the land being within the Core of the Urban Employment Zone.

On my review, the draft Planning & Design Code potentially erodes this position with the deletion of a clearly delineated core policy area (or sub zone) and the failure to apply an appropriate mechanism to prevent the encroachment of sensitive land uses such as residential without incorporating suitable protection measures.

Phillip Brunning & Associates

ABN 40 118 903 021

26 Wakeham Street
Adelaide SA 5000



The planning and development of the Charles Sturt Industrial Estate commenced well ahead of that on land to the north beyond the rail corridor at Cheltenham and St Clair for residential purposes. In this regard, it was appropriate for the incoming sensitive use (residential) to take appropriate steps to minimise conflict.

Regrettably, this residential estate and the dwellings constructed therein did not incorporate suitable measures to reduce this potential for conflict (more particularly noise) notwithstanding the technical investigations and recommendations that underpinned the case for rezoning of this land to residential.

The economic function and potential of this land, which has a long standing history of unencumbered industrial use, has potentially been diminished as a result of this encroachment by a sensitive land use. This to my mind is not orderly and proper planning and ought to be remedied.

One such remedy may be to introduce a policy overlay or subzone to the Employment Zone as proposed, so as to clearly and unambiguously provide for intensive 24 hour use in much the same manner as the current Desired Character for the Core Industry Policy Area 26 does, i.e.

Core Industry Policy Area 26

Desired Character

The area will be developed as an intensively industrialised, high quality, landscaped, 24 hour operation area. High impact industrial uses should locate in this area, which is remote from residential areas. The area is suitable for a wide range of scales and types of industrial activities including modern warehousing and distribution type premises, large well established manufacturing and engineering premises, transportation premises and food processing, as well as a range of smaller industrial and commercial and business activities, including crash repairs. The area will be protected from the intrusion of residential and other inappropriate uses which will reduce the land resource for employment uses or create potential for land use conflicts.

While this may not afford industry *carte blanche* to operate with impunity, it will provide the planning authority with a clear direction that this is an appropriate location for intensive 24 hour land uses, and that sensitive land uses proposed nearby ought to incorporate suitable measures to mitigate against off site impacts such as noise.

I trust that request may be accommodated so as to ensure a 'policy neutral' outcome.

Yours faithfully

PHILLIP BRUNNING & ASSOCIATES PTY LTD



PHILLIP BRUNNING RPIA
Registered Planner

cc. Mr Bruce Williams, General Manager City Services, City of Charles Sturt