



Local Government Association
of South Australia

The voice of local government.

Productive Economy Policy Discussion Paper

LGA SA Submission

February 2019

The Local Government Association of South Australia

The Local Government Association of South Australia (LGA) is the voice of local government in South Australia, representing all 68 individual councils across the state. The mission of the LGA is to provide leadership to councils for the benefit of the South Australian community.

Local government in South Australia employs almost 11,000 South Australians, has more than 700 elected members and a network of 11,000 volunteers from all walks of life – business people, community leaders, students, parents and retirees alike. South Australian councils collectively manage a budget of \$2 billion and public assets worth more than \$22 billion.

The LGA enjoys a productive relationship with both state and federal governments. As a partner in government, the sector plays a critical role in working with the State Government to drive economic and community development.

Introduction

The Local Government Association of South Australia (LGA) welcomes the opportunity to provide a response on the Productive Economy Discussion Paper.

The discussion paper sets out a proposed approach for better development policy and practices in crucial areas, including themes such as utilisation of industrial land, management of metropolitan growth and centres policy and investment in the retail sector.

The LGA has consulted with councils and held a briefing session with local government planning representatives to assist in the development of the submission.

The LGA appreciates the opportunity to provide comment on this important document which will have a significant bearing on the preparation of the Planning and Design Code (the Code).

The LGA notes that the Productive Economy Discussion paper is one of four discussion papers which will inform the preparation of the Code and that the purpose of these Discussion Paper is to 'stimulate thought around the policy direction for the Code'. It is understood that "People and Neighbourhoods" is still to be released.

Noting that the Discussion Paper provides an outline of timing and scope of the Commission's intended program for transitioning the 72 Development Plans into the Planning and Design Code, and based on the current Planning Reform Calendar, and public consultation on the Code commenced February 2019. The LGA is concerned that any engagement on the current Discussion Paper and the People and Neighbourhoods may not be meaningful and may not be used in the drafting of the Code.

Productive Economy Discussion Paper

Given planning has at its core legislation, policy, guidelines and precedents the desire to produce a framework that is wholly applicable and consistent across councils and regions, cities and towns is supported. However, it is recognised that the system put in place will be open to degrees of interpretation given the different political, environmental, cultural, social, demographic and geographic situations.

The one constant should be the guiding principles in interpretation and implementation.

The new Planning and Design Code (the Code) seeks to simplify the current planning system to better facilitate the economic development and growth objectives of the State by removing unnecessary 'red tape' for businesses, developers and investors, while balancing social and environmental needs and those of the broader communities. Employment prospects, effective business and services clusters, diverse residential offerings and innovative and flexible environments underpin strong, vibrant communities.

The LGA is mindful of the time lag between the development of the Code and its implementation and the changes in technology, consumer behaviour, global, regional and local economics, Federal, State and local leadership, climate and population. If economic development is seen as a key component of community wellbeing then the Code's current and future interpretation should reflect this and allow for and embrace change.

Regional Plans will be highly important in informing the Code in the future as these plans will be the result of a comprehensive and collaborative stakeholder engagement process with local communities.

Summary

The following are key issues and policy directions identified by the LGA in its consultation with member councils:

- From an economic development perspective there needs to be land use activity that supports a range of industry/employment opportunities.
- Need for consistent base guidelines supporting the decision-making process.
- Regular reviews of land use zoning should be undertaken in collaboration with local government.
- Councils having a greater involvement in the inputs to the decision-making process.
- Greater consideration of enabling infrastructure to support zoning decisions.
- Greater recognition of transport infrastructure, corridors and hubs as economic development drivers
- Greater consideration of "good design" outcomes to support the 'Productive Economy'
- Greater consideration of main streets and place making as economic drivers and their interconnectedness with services.

Theme 1: supporting and growing key industries (questions 1 to 9)

Recommendations

1. A comprehensive coordinated and collaborative stakeholder engagement process should be the cornerstone to Metropolitan Growth management.
2. Centres Policy should be retained and mainstreets and placemaking approaches be incorporated within the Centres Policy as these considerations are relevant and important despite the challenges to local retail exerted by on-line shopping and large department and supermarkets for example.
3. While continuing to recognise existing centres, expansion at 'edge of centre' locations and the development of new activity centres, while protecting the well formulated centres hierarchy, should be explored to encourage investment from new competitors and new formats in the retail sector.

4. The definition of retail and its relationship with 'Bulky Goods' retail should be reviewed as it has caused much confusion in land use planning, assessment and to the retailers and the general community.
5. The Productive Economy Discussion Paper should address the potential of airports to influence the economy.
6. The Productive economy Discussion paper should also address the issues associated with advanced manufacturing and logistics and distribution.
7. The State Government through its agencies should provide assistance with data capture, sharing and analysis that would help councils/regions identify and support business clusters. It is important for regional plans and zoning in the Code to set aside sufficient land which is suitable for commercial and industrial uses to help protect the viability of a range of businesses.
8. The Planning and Design Code must strike an appropriate balance between the competing objectives of encouraging new industry investment and diversification, while protecting valuable established agriculture and food production industries.
9. Further investigation is required into the use of Offset schemes is required.
10. Further consultation with councils, state agencies (particularly PIRSA), and farming and development industry representatives is required to further a policy position regarding subdivision and minimum allotment sizes within rural areas.

Theme 2: linking people to jobs, goods and services (Questions 10 to 14)

Recommendations

1. The concept of residential development in retail centres is supported in principle, provided the residential development is subordinate to the primary retail purpose of the zone, and provided the residential use doesn't compromise the operations of commercial development or appropriate amenity for occupants.
2. A 'one size fits all' height and setback criteria in employment land zones as a result of generic land use zoning may restrict emerging industries. The Planning and Design Code should consider performance criteria and design focused outcomes.
3. The Code should include policies that are adaptable to allow employment markets to evolve in response to changing business and community needs and recognise the move to business models that blend operating, service and delivery methods.
4. The definition(s) and associated policies for home based business/home industries be included in the Code, given the current diversity of policies relating to home businesses. The application of similar criteria for 'Home Activity' as contained in the *Development Act 1993* could be carried over.

Theme 3: providing infrastructure to enhance our liveability (Questions 15 to 17)

Recommendations

1. The Planning and Design Code should recognise and allow for the transition from a centralised electricity generation system to a more decentralised and sophisticated model.
2. The Planning and Design Code should include a policy framework for renewable energy which considers:
 - a. Land use zoning of suitable land for solar farms, wind farms and the like;
 - b. appropriate land use definitions;

- c. policies for assessing renewable energy developments (e.g. appropriate policies or guidelines which can be used when assessing wind and solar farms, including Minister's specifications);
 - d. policies for protecting renewable energy infrastructure on adjacent land, especially in a residential setting, such as overshadowing policies which require a certain amount of access to sunlight to adjacent solar panels; and
 - e. an up to date understanding of emerging renewable technologies.
3. While it is recognised that the adaptive re-use of buildings can provide economic and social outcomes and help preserve and maintain items of heritage significant, the concept of establishing separate titles for building for re-use particularly in primary production areas requires further consideration.

Theme 4: facilitating innovation and enabling investment (Questions 18 to 22)

This theme addressed collaboration and clustering, innovation districts, e-commerce and the Sharing Economy.

Recommendations

1. The Planning and Design Code providing a policy framework that enables innovation districts that facilitate collaboration and clustering.
2. That the Planning and Design Code facilitate innovation districts by identifying appropriate locations (with appropriate infrastructure) and the creation of suitable performance criteria.
3. 'Smart Cities' technology should be given greater consideration in the development of policy and there is a need to consider the design of 'innovation districts', to provide for productive, collaborative, and creative places.
4. Planning has a vital role in connecting the three main assets that make up the Innovation Ecosystem – Economic, Physical and Networking assets. The Planning and Design Code should provide policy outcomes which facilitate innovation districts by identifying appropriate locations (with appropriate infrastructure).
5. The Planning and Design Code should provide policy and assessment criteria for designated housing, student accommodation and a diversity of affordable housing types in mixed use innovation areas (and/or activity centres) that is 'capped' or ratio based approach so as not to compromise or dominate the area over non-residential uses. In addition to a numerical ratio, parameters around form could be included performance criteria.
6. In relation to the sharing economy the Planning and Design Code should focus on the implications/effects of the activity, not necessarily the activity itself. The Code will need to be adaptable to respond to the disruption created by the sharing economy.
7. E-commerce is the current and emerging issue, further investigation and consideration needs to be undertaken in respect to e-commerce activities and its potential impacts on both residential and commercial areas.

Responses to Questions

Question	Response to questions
Theme 1: supporting and growing key industries 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? Page 28	The Discussion Paper puts forward three key issues that need to be addressed when examining a more coordinated metropolitan staging program which provides greater certainty to all stakeholders and assist more orderly development. Key issues: • The strategic identification of suitably located land to accommodate new housing and employment industries linked to projected population and economic growth. • The maintenance of an integrated land supply and release program which ensures an efficient pipeline of land supply is maintained and linked to market demand. • The need for the timely, coordinated provision of infrastructure and services in line with staged growth plans and planning policies. Transparent, rigorous and robust and ongoing stakeholder engagement has to be the cornerstone. Sub-regional plans and issue-based scoping studies will need to be developed that address such items as; • Population projections in the short, mid and long term • Current and future housing availability, affordability and quality • Education and health provision • Emergency services considerations in terms of flood, fire, access to land, tree overhang etc • Housing, utilities and business infrastructure status and future needs • Liveability audit • Technology and data infrastructure • Demographic trends • Sport and Recreation facilities • Retail and industry by industry projections • Mainstreets and placemaking • Environmental protection and advancement

	• Climate Change adaptation • Transport corridors and paths • Walkability • Safety • Arts and culture • Employment current and future jobs • Competitive and comparative advantage • Local character and heritage • Tourism and the visitor economy • Waste All of these considerations will inform a robust, transparent and live Regional Plan, giving citizens and businesses a greater degree of certainty in terms of what, where, when, how and by whom approach to planning and desired outcomes (including stakeholder engagement).
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? Page 37	The continuation of a Centres Policy is supported with the inclusion of main streets and place making considerations. Page 37 of the Discussion Paper describes some guiding principles for retail: 1. Existing centres – recognise existing activity centres, main streets and mixed use areas as the primary place for commercial and retail activity. 2. Expansion – in existing designated centres, allow for expansion at 'edge of centre' locations, as well as intensifying within those areas. 3. New Activity Centres – allow new activity centres to be established to support equitable and convenient access to services, while also supporting productive settlement patterns. 4. Hierarchy – protect higher order centres that support a productive settlement pattern, while allowing for smaller scale activity centres to emerge and diversify. 5. Urban Design – reinforce the role of land use policies to guide urban form and place making in mixed use activity centres. In terms of policy approaches to help ensure South Australia's retailing sector is competitive, consideration be given to the following:

	• That whilst competition and types of retail are important in determining what small businesses can locate where, the 'experience' offered in retail centres holistically is important. • Coordinated 'branding' for retail and commercial precincts, such as main streets, can be an effective way of attracting business and supporting the broader community. • It is important to ensure precincts maintain a sufficient diversity of businesses. • The State and local government along with interested private sector players establish a Mainstreets and Placemaking Outreach Program to support the work of the councils, RDA's, Chambers of Commerce. • New entrants must be judged on motive, ownership, compatibility with the personality and culture of the region. The entry of multinationals can bring greater diversity of products and lower prices but at the cost of local business viability and true diversity in product offerings. • Greater partnerships between State and local governments, Business SA and organisations such as Mainstreets SA are important in real-time information exchange to make decisions about competition placement and entry allowance • A standard retail socio-economic impact assessment tool be developed.
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? Page 37	A well consulted Regional Plan and coordinated metropolitan staging program should strategically identify any new retail land and describe the interface between this land and that zoned for residential in the short, mid and long term.
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? Page 43	Employment Lands should be well serviced in terms of infrastructure, utility and internet connection, appropriate buffers, transport connectivity, close proximity with current and potential suppliers and have the ability to be adapted for other future uses where possible. The Regional Plan should identify potential emerging businesses and industries and by extension employment lands and in some cases the reverse can be true that the allocation of the land can stimulate investment and attract new firms and industries. Agricultural and pastoral lands should be highly protected, food security taken very seriously and reflected in regional plans and employment land zoning. Employment lands can be allocated to be in close proximity to these

	activities and/or in advantageous places within the town close to retail distribution and/or transport distribution points depending on the final product. Given the increasing constraints on available land mixed-use planning will become increasingly important and it would be prudent to learn from countries and states that have faced this before and see what they have done. With respect to emerging businesses, incorporating land use definitions in the Code, rather than in the Regulations as is currently the case, will allow for more 'real time' changes to land use definitions based on emerging business types and experiences and outcomes in development assessment. Practice directions can also help to address any immediate issues relating to misinterpretation of land use definitions etc.
How Could Offset Schemes be used? Page 43	Offset schemes can be utilised to provide important broader community services and facilities as ancillary parts of the infrastructure planning arrangements associated with new land utilisation brought about by new investment and economic activity. However, while off-set schemes may have some benefits, the use of such scheme's require further evidenced based research.
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? Page 53	It is important that our Primary Production lands are protected, as these land uses and outputs will remain the critical economic driver for our State (and in particular, our Regions). Further evidence based research is required as to widths and types of buffers The Code needs to provide certainty to primary production areas, industries and producers that ensures their viability without having to face increased pressure from non-envisaged land uses.
Does policy regarding subdivision and minimum allotment sizes need to be reviewed and strengthened? Page 53	Proposals for land division (including realignment) should demonstrate how the division promotes the objectives of Zone. Through the introduction of the Code a policy review into what constitutes a boundary alignment is needed such that 'new' allotments are not created as a result i.e. where greater than 10 per cent of the boundary and/or allotment size changes.
1.2 Tourism	The Code should be written to provide both deemed to satisfy and performance assessed criteria.

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? Page 54	Deemed to satisfy could provide guidance around size, materials, and placement (say within 100m to township boundaries). Performance assessed could also include criteria where it benefits the community.
1.3 Mining and Exploration Should undeveloped strategic mineral resources be identified and protected from urban encroachment and other incompatible development? Page 55	Undeveloped strategic mineral resources should be identified and protected from urban encroachment and other incompatible development. Urban forms should not encroach on strategic mineral resources and should be designed to minimise any potential adverse impacts of extractive industries. This can be achieved through the use of appropriate zoning (e.g. Mineral Extraction Zone) including appropriate buffers (distance and treatments). Where a proposal to close off a source of natural resource is under consideration, the proponent should demonstrate the resource is exhausted or no longer required before consideration of site reuse or rehabilitation.
Theme 2: 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? Page 57	The centres hierarchy policy is a well-established system in the current planning framework. The Deloitte Paper <i>Land Use Planning and the South Australian Economy</i> appears to support the retention of centres, and facilitating new centres where required to accommodate a growing population. Benefits of Centres Hierarchy As recognised in part in the Discussion Paper, the benefits of a centres hierarchy include, but are not limited to: • concentration of businesses maximising customer patronage, co-ordinated facilities and strategic transport movements. This prevents dilution of customer catchments to help support and maintain local brick and mortar shops, some of which are struggling to compete against online shopping and large corporations; • planned transport networks (including public transport routes and freight deliveries), based on the trip generation potential of larger centres. Customers are more likely to take public transport to a major centre where they intend to stay for a reasonable length of time and visit different shops/services, whereas they are much more likely to drive to isolated 'destination' shops; • centralise shops, services and infrastructure which provides convenience for customers and staff; • facilitate shared parking arrangements creating car parking efficiencies;

	• provide some assurance to business owners and surrounding residents as to the expected scale of development and economic climate within their area. This helps provide some certainty to business operators about their customer base and competition, and helps residents make informed decisions about where they want to live; • similarly, clear zone designation enables market forces to operate more fairly. The Planning and Design Code should contain new descriptors for centres based on the desired character of the place and desired land uses to support the level and extent of economic activity. These policies should be adaptable enough to allow employment markets to evolve in response to changing business and community needs and recognise that contemporary production processes often involve a blending of services delivery, assembly and logistics in the one premises.
Should there be residential development within retail centres? If so, how could/should this occur? Page 57	Incorporating residential uses can offer the following benefits: • improve the highest and best use of the land – subject to meeting development policy requirements; • maintains a level of activity outside of usual business hours providing passive surveillance; • can encourage a diverse range of businesses (e.g. convenience stores and cafes in areas which might otherwise be limited to retail shops or offices); • contribute to housing diversity in convenient locations. Code policies should require meaningful noise attenuation measures in new residential developments where there are nearby existing noise generating businesses or high traffic roads. Subzones and other spatially specific policy may also need to exclude residential uses in parts of a zone if potential noise, odour or other emissions issues are likely to be too difficult to mitigate. Code policies could: • state that ground level (and first floor level where appropriate) should be commercial uses only; • provide some incentives for mixed use buildings where appropriate (e.g. mixed use buildings can be three storeys whereas entirely residential buildings can only be two storeys, provided that three storeys would still be appropriate); • encourage shared car parking areas where residential and commercial uses have different peak times; • not allow for much policy flexibility for residential uses (e.g. not compromise on minimum private open space, car parking, noise attenuation etc); and

	encourage genuinely integrated commercial/dwelling developments where the occupant works in the attached business. It is important that the 'Desired Outcomes' of business zones place an emphasis on predominant desired land uses such as retail, commercial and other business activities and note residential uses as ancillary or secondary.
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? Page 58	Mixed use zones are important economically and socially but they should be in appropriate locations and with the appropriate mix of uses to avoid incompatible uses and land use conflicts. Land use definitions will be particularly important in the new planning system both in managing emerging types of businesses and in ensuring there is a consistent interpretation of land uses amongst all practitioners. It is important to distinguish between land uses and built form and scale; it is important that an assessment on the merits of a proposal can be undertaken for larger scale changes.
Is there too much emphasis placed on height and setback criteria in employment land zones, in particular the 'core' of these zones? Page 58	The Code should recognise interface and core areas and should also focus on design outcomes which include provision of quality landscaping.
2.3 Home-based Businesses What innovations and changes to work practices will impact the planning system and how should we respond? Page 59	Smart technologies 5G mobile technology coverage commencing early 2020 in Australia has the potential to increase the ability to work from home, at least a few days a week. Online trading/business eCommerce and online connectivity has, and will continue to have, a significant impact on work practices. Some businesses operate with a reduced shopfront or don't have any shopfront at all due to online sales, while online connectivity provides greater opportunities for people to work from home. The current definition of 'home activity' works relatively well, but could be reviewed to ensure it is meeting the needs of modern home activities. Home businesses

	The policies relating to ‘home-based industries’ in SAPPL indicates a more specific type of home based business applicable in rural areas which is limited to ‘arts, crafts, tourist or heritage related tourism’. The definitions need to consider the changing home business as a result of e-commerce. It is recommended that definition(s) and associated policies for home based business/home industries be included in the Code, given the current diversity of policies relating to home businesses. Diversification of businesses Business competition (both domestic and international), along with changing expectations from customers, often pushes business to diversify their products and services. Examples may include: • integrated service stations; • cafes being included in hair salons, car washes, garden centres or hardware stores; • businesses expanding their services such as an air conditioning company now also offering solar panels, batteries, home improvements etc; • and furniture shops increasing homewares and giftware offerings. These types of businesses can blur the distinction between land uses so it is important for the Code to provide guidance on how to deal with this type of diversification The Code should be focused on quality outcomes which can be controlled through performance based and impact minimisation orientated policy settings.
Theme 3: 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? Page 60	Planning policy needs to recognise the changing needs in energy creation and consumption patterns. Planning policy should not be a barrier to the uptake of this new technology. The planning system should recognise and allow for the transition from a centralised electricity generation system to a more decentralised and sophisticated model. The planning system should also encourage passive design and urban greening to underpin these efforts. Planning policy should: • be underpinned by passive design principles so to encourage homes that use energy efficiently and reduce energy overall demand

	• encourage urban greening to reduce the urban heat island effect as another method for reducing energy demand • allow the placement of photovoltaic solar cells in optimum positions to maximise energy capture on site • provide solar access rights to ensure optimum energy capture (balanced with the need for infill) • not preclude innovative infrastructure that can facilitate the sharing of energy between households • anticipate and allow for the introduction of vehicle charging points throughout the urban area • anticipate and allow for critical, sustainable energy infrastructure in proximity to urban areas (e.g. wind farms, solar farms, geothermal and waste to energy) • anticipate and allow for the move from centralised electricity generation to decentralised generation and local storage, including in and around urban areas.
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? Page 61	While it is recognised that the adaptive re-use of buildings can provide economic and social outcomes and help preserve and maintain items of heritage significant, the concept of establishing separate titles for building for re-use particularly in primary production areas requires further consideration. In terms of economic activity, the Code will need to provide policy flexible enough to accommodate tourism and service industries to on-farm or product-based value-adding opportunities, the 'value chains' that support primary production. Activities which are consistent and support primary production may include: • nature-based tourism or short term accommodation (where for a camping ground or small scale holiday cabins) • home based business • shop (includes cellar door and art centres) • food (olives, cheese making) and other beverage (non-alcoholic) • restaurant • function centres • agricultural industries • wineries, breweries, cideries and distilleries

3.3 Infrastructure How can we ensure that land use planning is able to accommodate and support the provision of new and innovative infrastructure? Page 61	Improved infrastructure is economically important to any region, planning policy should support its delivery in an orderly and co-ordinated manner. The PDI Act introduces two new Infrastructure Schemes, the 'Basic' and the 'General' Infrastructure Schemes. Development contributions for infrastructure can provide for the resourcing of public open space, footpaths, street trees, parks and land for community facilities, roads, sewer and stormwater.
Theme 4: 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? Page 62	Planning has a vital role in connecting the three main assets that make up the Innovation Ecosystem – Economic, Physical and Networking assets. The planning system can facilitate innovation districts by identifying appropriate locations (with appropriate infrastructure) and creating suitable zones and policies if there is sufficient demonstration of needs and opportunities. Better sharing of data will facilitate councils to make better decisions and make identifying clusters easier. An innovation district requires mixed use complementary planning policies supporting regeneration of existing location that attracts innovative and creative companies, workers, supporting businesses and neighbouring residential precincts. The Code can provide improved certainty for industry and business by focusing on the designation of employment lands and precincts to support industry clustering and activity.
How do we ensure that residential development does not monopolise the offering in mixed-use areas of innovation districts? Page 62 4.2 E-Commerce and 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	The Code can provide policy for designated housing, student accommodation and a diversity of affordable housing types in mixed use innovation areas (and/or activity centres) that is 'capped' or ratio based approach so as not to compromise or dominate the area over non-residential uses. In addition to a numerical ratio, parameters around form could be included as performance criteria. The sharing economy encompasses a range of different activities including ride/car/bike sharing, accommodation sharing, peer-to-peer online retailing (e.g. sellers on eBay), crowdfunding or peer-to-peer lending, co-working spaces etc. The activities likely to have the biggest impact on the planning system include accommodation sharing and co-working spaces as these affect the use of buildings, and to a lesser extent car sharing if designated spaces need to be provided in developments.

rentals into short stay holiday
accommodation via online platforms)?
Page 62



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