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21 March 2014

Mr Darrell Channing Director Adjudication Branch Australian Competition and Consumer Commission GPO Box 3131 CANBERRA ACT 2601

Dear Mr Channing

Urban Renewal Authority - Submission

The City of Charles Sturt appreciates the opportunity to make comment during the formal interested party consultation period for the Urban Renewal Authority, trading as Renewal SA's (the applicant), application for authorisation A91416. Council has reviewed the Renewal SA submission and fully supports their application.

The City of Charles Sturt is a diverse community of over 108,000 residents likely to increase to 150,000 over the next 25 years. Employment within Charles Sturt has historically been in the area of manufacturing, now undergoing substantial structural change. Our labour force profile has seen a significant shift from traditional manufacturing to health and service-based employment. Typically service-based employment may pay at a lesser rate with work occurring over a 24 hour seven day period. To this end, different housing choices located close to employment and services that is affordable is fundamental to supporting this employment and cultural shift.

The City of Charles Sturt recognises this within its Community Strategic Plan by adopting strategies that seek to "build partnerships with other levels of government together with the housing industry to provide an appropriate range of housing" and has developed an economic development strategy to facilitate this transition from a manufacturing to a service-based economy. Council is working closely with a range of industry leaders to develop new markets, support retraining of local workers, while up-skilling our community through population growth and infrastructure investment. To ensure a competitive and vibrant economy can prosper at Charles Sturt housing diversity, affordable choice and a regeneration of our work force profile is fundamental. The eligibility criteria that focuses on key worker housing in partnership with Community Housing Limited assists Council and its community achieve these goals.

To that end, and in reviewing the applicant's schedule 1, Council concurs with the approach taken and the benefits as listed and firmly believes that there will be no public detriment of any substance when compared to what can be achieved.

We therefore request that the Australian Competition and Consumer Commission support Renewal SA's application.

Yours sincerely

Mark Withers

Chief Executive Office