

Summary and Response to Agency Submissions

Sub No.	Agency name/Address/ Contact Person	Submission Summary	Comment	Council Response
1.	Daniel Cooper Technical Officer – Third Party Works APA Group Planning and Integrity 330 Grange Road, Kidman Park 5025	1.1 <i>Advised that the gas main on the eastern side of Findon Road will not be affected by the rezoning.</i>	1.1 Noted.	1.1 No changes proposed to the draft DPA.
		1.2 <i>Advised that depending on development proposals, the gas main in Keele Place (within the area of the draft DPA) may need to be altered or removed. Any such works would occur at the proponent's cost.</i>	1.2 Noted. This is a development proposal matter, not an issue for this draft DPA process.	1.2 No changes proposed to the draft DPA.
2.	Luke Oliver Team Leader – Operational Planning, Public Transport Operations and Planning Public Transport Services Division Department of Planning, Transport and Infrastructure GPO Box 1533 Adelaide SA 5001	2.1 <i>Raised no objections to the proposed draft DPA and supports the location of mixed-use development along existing public transport corridors.</i>	2.1 Noted.	2.1 No changes proposed to the draft DPA.
		2.2 <i>Advised that new developments must take into account the existing public transport network, with designs being sensitive to Adelaide Metro bus operations (i.e. in relation to new or amended driveway crossovers, new car parks, on-street parking, public safety, etc). These aspects should be assessed by PTOP at the development assessment stage.</i>	2.2 Noted. This is a development proposal matter, not an issue for this draft DPA process.	2.2 No changes proposed to the draft DPA.
		2.3 <i>Indicated that any changes proposed to the location and operation of public transport infrastructure needs to be done in consultation with PTOP. Any such works would occur at the proponent's cost.</i>	2.3 Noted. This is a development proposal matter, not an issue for this draft DPA process.	2.3 No changes proposed to the draft DPA.
3.	John Rushforth Senior Urban Planner SA Housing Authority Level 5 West Riverside Centre North Terrace Adelaide SA 5000	3.1 <i>SAHA supports the intention of the draft DPA and proposed key changes in relation to affordable housing.</i>	3.1 Noted.	3.1 No changes proposed to the draft DPA.
		3.2 <i>Indicated there is an identified need for affordable housing in the City of Charles Sturt.</i>	3.2 Noted.	3.2 No changes proposed to the draft DPA.
		3.3 <i>The DPA addresses the Targets and Policies for affordable housing in The 30-Year Plan for Greater Adelaide (2017 Update).</i>	3.3 Noted.	3.3 No changes proposed to the draft DPA.

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		<p>3.4 <i>Suggested amending the PDCs for Urban Village Findon Policy Area 9 by:</i></p> <p>3.4.1 <i>Including 'affordable housing' as an envisaged land use</i></p> <p>3.4.2 <i>Introducing development incentives for affordable housing such as:</i></p> <ul style="list-style-type: none"> o <i>Specified quantitative incentives</i> o <i>% reductions</i> o <i>Adopting a qualitative assessment approach.</i> 	<p>3.4.1 This approach is supported in that portion of the Policy Area affected by this draft DPA.</p> <p>3.4.2 Affordable housing is currently referenced under General Section Residential Development and Affordable Housing Overlay policies, in some specific zones in the City. In addition, this draft DPA includes all of the Affected Area as an 'Affordable Housing Designated Area', which requires consideration be given to the Overlay policies.</p> <p>However, the Development Plan does not currently list incentives in relation to affordable housing across the Council area. Generally, these incentives would involve smaller site areas and reduced minimum parking space numbers. Given this context the suggestion to introduce incentives for affordable housing is not considered warranted.</p>	<p>3.4.1 Amend PDC 1 for Urban Village Findon Policy Area 9 to include affordable housing as an envisaged land use.</p> <p>3.4.2 The introduction of incentives for affordable housing for just this portion of the Council area is not considered warranted. No changes proposed to the draft DPA.</p>
4.	Mandie Busby Real Estate Advisor SA Power Networks 1 Anzac Highway Keswick SA 5035	<p>4.1 <i>Advised it is not practical for SAPN to review every DPA to the extent necessary to comment in detail, therefore it provides a general response.</i></p> <p>4.2 <i>Advised prospective developers of long lead times to meet any increased load demand and specifically brought attention to the 'limited spare capacity of the existing electricity infrastructure in the area related to this DPA.'</i></p>	<p>4.1 Noted.</p> <p>4.2 Noted.</p>	<p>4.1 No changes proposed to the draft DPA.</p> <p>4.2 No changes proposed to the draft DPA.</p>

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		4.3 <i>Advised generally that developers may need to contribute towards augmentation of the upstream electricity network along with funding direct costs associated with extension/connection of electrical infrastructure for their development.</i>	4.3 Noted.	4.3 No changes proposed to the draft DPA.
5.	Matt Minagall Senior Manager, Customer Growth SA Water 250 Victoria Square Adelaide SA 5000	5.1 <i>Advised SA Water currently provides water and sewerage services to the Affected Area and that networks augmentation may be required should the rezoning generate an increased in demands.</i>	5.1 Noted.	5.1 No changes proposed to the draft DPA.
		5.2 <i>Advised the extent of augmentation works (if required) will be dependent on the final scope and layout of the future developments and will be required to comply with SA Water Technical Standards.</i>	5.2 Noted. This is a development proposal matter, not an issue for this draft DPA process.	5.2 No changes proposed to the draft DPA.
		5.3 <i>Provided general advice on:</i> <ul style="list-style-type: none"> o SA Water Planning o Protection of Source Water o Provision of Infrastructure o Trade waste Discharge Agreements. 	5.3 Noted.	5.3 No changes proposed to the draft DPA.
6.	Louisa Halliday Planning and Evaluation Manager Adelaide and Mt Lofty Ranges Natural Resources Management Board 205 Greenhill Road Eastwood SA 5063	6.1 <i>Advised the intent of the DPA is supported.</i>	6.1 Noted.	6.1 No changes proposed to the draft DPA.
		6.2 <i>Supports maximising open green space and retention of mature trees.</i>	6.2 Open space provision is to be negotiated at the development proposal stage and proposed policy supports the practical retention of mature trees.	6.2 No changes proposed to the draft DPA.
		6.3 <i>Supports the DPA's position in regard to stormwater management and WSUD and encourages application of WSUD principles for future development.</i>	6.3 Noted. Water sensitive design policies are already included in the General Section of the Development Plan.	6.3 No changes proposed to the draft DPA.
7.	James Cother Principal Adviser Policy and Projects Planning and Impact Assessment Environment Protection Authority	7.1 <i>Advised that external interface issues are less likely to occur under the proposed zoning as envisaged land uses have a lower impact nature. Indicated however, the mixed-use nature of the Zone means there is potential for internal interface issues. Indicated the application of the</i>	7.1 Noted.	7.1 No changes proposed to the draft DPA.

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	211 Victoria Square Adelaide SA 5000	<p><i>existing "Interface Between Land Uses" policies, and the proposed Desired Character statement and "Noise and Air Emissions Overlay", is supported by the EPA.</i></p> <p>The EPA reconfirmed this position in a further email to Council dated 1 July 2019, summarised as:</p> <ul style="list-style-type: none"> • <i>Existing and potential land uses in the existing Urban Employment Zone would normally have greater environmental impacts than those land uses proposed in the Mixed-Use Zone; and</i> • <i>The proposed Desired Character statement for the Mixed-Use Zone, the Noise and Air Emissions Overlay and the existing Interface Between Land Uses sections of the Development Plan applicable to the proposed Mixed Use Zoning are supported by the EPA as being sufficient in addressing interface issues.</i> • <i>Noted that here are no EPA licensed activities within the DPA area or within very close proximity.</i> 		
		7.2 <i>Noted that while the 'Stormwater and service infrastructure investigations' did not consider improvements to stormwater quality, pollution management or interaction with groundwater, existing General Section policies for Land Division and Natural Resources require consideration of Water Sensitive Design matters.</i>	7.2 Noted.	7.2 No changes proposed to the draft DPA.
		7.3 <i>Suggested Council may wish to include a PDC relating to site contamination investigations and its interaction with stormwater management.</i>	7.3 The General Section Hazards policy within the Development Plan already requires consideration be given to development on contaminated land to ensure that it 'will not pose a threat to the health and safety of the environment ...'. This provision is considered sufficient	7.3 No changes proposed to the draft DPA.

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			to meet the suggestion.	
		7.4 <i>Supports the inclusion of the proposed additional policy to ensure that development of sites that could be affected by PCAs does not occur until appropriate investigations and remediation is undertaken.</i>	7.4 Noted.	7.4 No changes proposed to the draft DPA.
8.	Nadia Gencarelli Team Leader, Council Development Plan Amendments Planning and Land Use Services Department of Planning, Transport and Infrastructure Level 5 50 Flinders Street Adelaide SA 5000	8.1 <i>Advised that Concept Plans will not form part of the Planning and Design Code.</i>	8.1 The draft DPA proposes amendments to existing 'Concept Plan Map ChSt/6 Urban Village Findon Policy Area 9' to include the Area Affected by this draft DPA. While the features shown on the Concept Plan are discussed in various PDCs, its retention is considered worthwhile as it formed part of the draft DPA statutory consultation process and provides a visual representation of the intent of the policy words. This issue will be considered further as the Development Plan is transitioned to the Planning and Design Code in 2020.	8.1 No changes proposed to the draft DPA.
		8.2 <i>Indicated that the degree of saturation for certain vehicle movements at the intersection of Findon and Grange Roads exceeds 1.0 in the traffic modelling as a result of this DPA and the separate ALDI and Metcash DPAs. Therefore, recommended treatments/modification to this intersection are likely to be necessary to reduce anticipated traffic saturation. Agreements for such road works should be put in place before authorisation of the draft DPA.</i>	8.2 CIRQA traffic consultants have advised that DPTI's written advice does not acknowledge the existing oversaturation for a number of vehicle movements at the intersection of Findon and Grange Roads. The original traffic analysis indicated that the proposed rezoning of the subject site and associated redevelopment would improve the existing conditions at this intersection due to reduced commercial vehicle movements	8.2 No changes proposed to the draft DPA.

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			<p>and alterations in the distribution of traffic movements resulting from anticipated development.</p> <p>CIRQA has also advised that the only traffic movement that is currently below saturation but reaches oversaturation in the redevelopment Scenario 1 is the right turn from Findon Road south) in the a.m. period. The original SIDRA modelling did not include alterations to the intersection phasing of traffic lights.</p> <p>Further information was prepared by CIRQA in the form of a revised SIDRA analysis based on the DPTI's comments. Given the overall improvement in the Degree of Saturation, there is opportunity to alter the traffic light phasing times, which would reduce the saturation for the Findon Road (south) right turn movement to 0.889 (i.e. less than 1.0). Importantly, this also means that traffic volumes do not result in any single movement increasing above a Degree of Saturation of 1.0. Those movements that exceed 1.0 already do so and will not be worsened. CIRQA concluded in its advice that given the improvement to traffic conditions associated with the subject DPA, it does not consider that there are upgrade warrants associated with the proposed rezoning.</p>	

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		8.3 <i>Reminded Council of the need for the timely completion of the draft DPA in regard to the introduction of the Planning and Design Code in mid-2020.</i>	8.3 Progress on the draft DPA is well within the timeframes set for approval of DPAs prior to the introduction of the Code.	8.3 No changes proposed to the draft DPA.
		8.4 <i>Reminded Council of the need for it to provide a copy of its responses to the relevant agencies.</i>	8.4 Noted.	8.4 No changes proposed to the draft DPA. Administration will provide a copy of Council's responses to relevant agencies through its DPA package to DPTI and the Minister following a decision on the draft DPA by Council.
		8.5 <i>Advised of requirements for the approval package and suggested a hand-over meeting for the package.</i>	8.5 All requirements for the approval package will be met and Administration will meet with DPTI to hand-over and discuss the information provided.	8.5 No changes proposed to the draft DPA.
		8.6 <i>Sought amendments to Overlay Map 19 – Affordable Housing. Reference to Airport Building heights should be removed from this map and to Overlay Map 19 – Noise and Air Emissions to identify which road and of which type (A, B or R) generates the Designated Area. Indicated reference to Airport Building Heights should also be removed from this Map.</i>	8.6 Noted.	8.6 Amend Overlay Map 19 – Affordable Housing and Overlay Map 19 – Noise and Air Emissions accordingly.