



**City of
Norwood
Payneham
& St Peters**

14 July 2017

Mr Tim Anderson QC
Chairperson
State Planning Commission
c/- Department of Planning, Transport & Infrastructure
GPO Box 1815
ADELAIDE SA 5001

**CHIEF
EXECUTIVE'S
OFFICE**

Dear Mr Anderson

**DRAFT INNER AND MIDDLE METROPOLITAN CORRIDOR (SITES)
DEVELOPMENT PLAN AMENDMENT**

I refer to the release of the draft *Inner and Middle Metropolitan Corridor (Sites) Development Plan Amendment (DPA)*, for public and agency consultation.

The City of Norwood Payneham & St Peters appreciates the opportunity to have input into this important planning policy document, which proposes a new planning policy framework for twelve (12) selected sites across metropolitan Adelaide, to progress further in-fill opportunities, where interface impacts can be managed through quality design outcomes.

The Council notes that the proposed rezoning is being advanced by the State Government to "unlock" opportunities for urban renewal and economic development for sites that are 'development-ready' and located adjacent strategic transit corridors. However, there is a need to balance the proposed 'uplift' policies, with the protection and enhancement of streetscapes and places, which reflect the built and cultural history of the City of Norwood Payneham & St Peters and many other areas across the inner and middle suburbs of metropolitan Adelaide.

The Council understands that since the release of the draft DPAs, there has been public criticism of the draft *Inner and Middle Metropolitan Corridor (Sites) DPA*, with some observers arguing that the draft DPA picks 'winners and losers' through what is ostensibly 'spot re-zonings' rather than selecting land to be re-zoned based on strategic criteria, which would lead to a more co-ordinated, integrated and equitable outcome. In other words, use a proper planning and professional approach to town planning and urban design policy development.

In response, the State Government has argued that the sites have been carefully selected to continue to progress the Minister for Planning's direction to progress further in-fill opportunities, where interface impacts can be managed through quality design outcomes and were chosen based on strategic criteria, including being within the identified corridors, being of sufficient size to manage interface issues through good design, as well as being development ready.

Most importantly, the State Government argues that the DPA sits comfortably within the setting of the *30 Year Plan*, which sets the target for 85% of all new development to be in-fill development. The draft DPA is "*the next logical step in the evolution of planning for strategic growth corridors, makes the most of public transport investment and supports vibrant and walkable neighbourhoods.*"

175 The Parade,
Norwood SA 5067

PO Box 204
Kent Town SA 5071

Telephone
8366 4555

Facsimile
8332 6338

Email
townhall@npsp.sa.gov.au

Website
www.npsp.sa.gov.au



100% Australian Made
Recycled Paper

**Community
Well-being is...**
Social Equity
Cultural Vitality
Economic Prosperity
Environmental
Sustainability

Whilst the criteria against which the sites were chosen for inclusion in the draft DPA are considered logical and rationale, the progression of a DPA which facilitates the re-zoning of twelve development sites during the 'hold' period of the *Inner and Middle Metropolitan Corridor Infill* DPA, is questioned.

The draft *Inner and Middle Metropolitan Corridor (Sites)* DPA may, if approved, have short term economic benefits. However, from an economic stand-point, the 'spot re-zonings' at the scale which is proposed in the draft DPA, is not equitable nor strategic and could have the unintended consequence of eroding and undermining consumer property investment confidence in the inner and middle suburbs of metropolitan Adelaide in the short to medium term.

Given the fragile and limited nature of the market demand for 'apartments' across metropolitan Adelaide, property owners and developers whose development sites were not included in the draft DPA, may be wary of making further investments in the short to medium term, given the uncertainty of the selection process for the inclusion of sites in a 'sites specific' DPA and the short term saturation of the 'apartment market', resulting from the uptake of opportunities afforded to developers whose properties have been included in the draft DPA.

The draft DPA also does not appear to be supported by any economic analysis of the market demand for apartments across metropolitan Adelaide. Whilst the likely apartment yield from twelve development sites is not substantial in terms of the overall market demand for apartments across metropolitan Adelaide, the Council believes that some economic analysis should nevertheless be included in the investigations section of the draft DPA to support the proposed re-zonings.

Creating new opportunities for medium-rise residential and mixed-use development on sites along transit corridors, but outside of the current Urban Corridor Zone and District Centre (Norwood) Zone, may also be detrimental to the progress of development in those existing zones. There appears to be a fragile demand for apartment style housing in Adelaide, particularly outside of the Adelaide CBD. It is worth noting that following the initial 'rush' of development approvals for apartments in Kent Town and The Parade following the 'uplift' DPA in 2013, there has been a marked slowing down of approved projects reaching construction and new projects being proposed. Conversely, Council staff have observed that there has been increased interest in traditional townhouse style dwellings in those areas.

The future vitality of Kent Town and The Parade, as jointly sought by the Council and the Department of Planning Transport & Infrastructure, is, in part, dependent on new projects occurring within those areas, to create the population required to support an expanded range of commercial activities and services, which would in turn, further entrenching the suitability of Norwood and Kent Town as truly liveable, thriving local areas. Without the local population which may be provided by new mixed use developments, the viability of investment in new local shops, improved public transport, night-time activation etc., is significantly diminished. The 'out of centre' development opportunities being progressed in the draft DPA, including the Hackney Hotel site, 1-5 Beulah Road, Norwood and 53-60 The Parade, Norwood, could consume the short-term market demand for apartments within the City of Norwood Payneham & St Peters, thus slowing the rate of development within the heart of Kent Town and The Parade.

The potential for the new development sites to accommodate retail and commercial activity, such as supermarkets, of a scale ordinarily reserved for a District Centre Zone or similar zoning, can cumulatively erode the viability and function of existing higher order centres within the Council area. Whilst, the quantum that may result for the implementation of the draft Site specific DPA may not of itself be problematic, it further highlights the difficulties that can arise with ad-hoc re-zoning such as that proposed in the draft DPA.

It is understood that a large component of the rationale for re-zoning each of the proposed sites is that they are currently 'development ready'. This in itself reinforces the perception and in deed the conclusion that the sites have been chosen on the basis of known development proposals. This is hardly a strategic approach and does not accord with good planning practice.

Whilst these sites may be "development ready", it may also be the case that there are many other sites of equivalent readiness for development, located within the current Urban Corridor Zone and District Centre (Norwood) Zone (or for that matter outside of those zones). Without a more robust strategic and corridor wide analysis of development sites located within the inner suburbs, there is no

way of truly knowing which sites are truly 'development ready'. Even then, there is no guarantee as to which sites will ultimately be developed and which will not.

In this context, the Council questions the strategy of site specific re-zoning or "spot-rezoning", particularly when the broader strategic context of the Inner and *Middle Metropolitan Corridor Infill DPA* has not been tested in the community. The criteria of being 'development ready' appears to be ad-hoc, inequitable and without strategic basis. As such, the Council strongly opposes the progression of the *draft Inner and Middle Metropolitan Corridor (Sites) DPA*, on the basis that it is fundamentally inequitable and without strategic basis.

That said, if the site specific DPA is to be progressed further, each of the sites affected by the draft DPA within the City of Norwood Payneham & St Peters, may warrant inclusion, when considered on their individual merit, subject to a range of considerations and resolution of issues as set out below.

Built form outcomes

The Council understands that the methodology for determining building heights for the site investigation areas, is based on the concept of '*Street Width Ratios*' and that widely accepted urban design practice suggests the height of buildings along a site investigation / corridor area, should relate to the width of the street, or pedestrian viewing perspective, to maintain a human scale. It is noted that a "*street width ratio*" of 1:1 is often used as a guide to assist in determining desirable maximum building heights (i.e. street width = building height as a number of storeys).

This urban design principle is particularly important in locations where the street width is relatively narrow and will assist in ensuring that building scale adjacent to public spaces are not dominated by buildings as viewed by pedestrians. Correlating street width to building height is based on allowing 4.5 metres for the ground floor and 3.5 metres for every storey above.

The '*street width ratio*' forms the primary basis for establishing guideline maximum building heights within the site investigation areas identified in the draft DPA, except where a lesser height is determined through application of the building envelope policy (see below), or where particular local circumstances warrant an adjusted height.

In considering building heights in the draft DPA investigations, the Council has noted that the *Inner Metro Rim Structure Plan*, also provides zone guidance on the matter and specifies that 'transit corridors' have a building height range of up to a maximum of six (6) storeys.

Whilst the application of the '*street width ratio*' concept is a useful starting point for determining maximum building heights, the concept must be considered concurrently with interface considerations and context and the likely building envelope available to accommodate new buildings that can appropriate address issues such as overlooking, overshadowing, building mass and relative scale. An additional and very important consideration is the existing built form context and desired character of areas surrounding the site proposed for re-zoning.

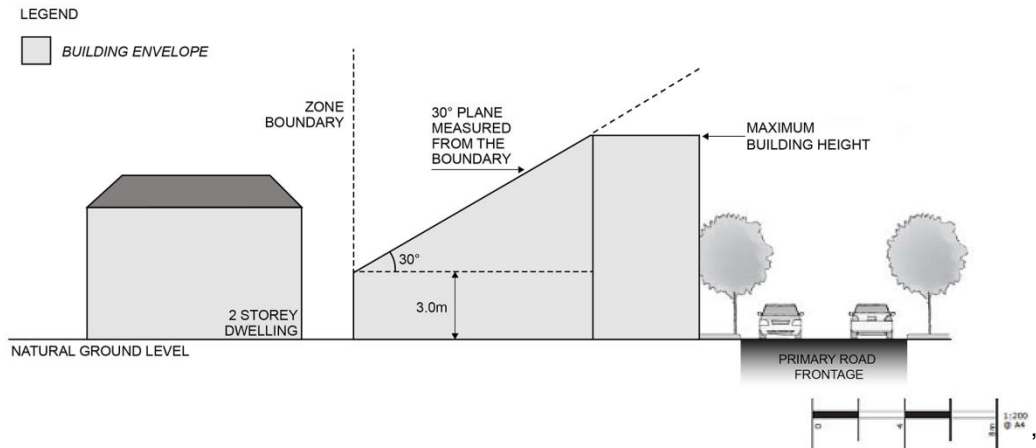
It is considered that the proposed building heights are excessive for some of the sites affected by the draft DPA and if developed to their prescribed maximums (or more, which is often the case with the current interpretation of policy by the DAC and IMDAC), could have significant undesirable built form outcomes.

Two (2) important considerations to have regard to are how the "front-end" design of taller buildings will relate to, or impact upon, the character of the street, particularly in locations along The Parade and Magill Road, which have a defined low-scale built form character and how the 'back-end' design of taller buildings relate to, or impact on, the adjacent low-scale residential areas.

The draft DPA proposes to extend the use of a building height-capping formula, which is expressed through existing Principle of Development Control (PDC) 14 within the Urban Corridor Zone. This PDC, which is set out below, guides the extent of the building envelope that can be developed on an allotment, tested against a 30 degree angle projection from a defined setback point from the rear of the development site.

“Interface Height Provisions

- 13** *To minimise building massing at the interface with residential development outside of the zone, buildings should be constructed within a building envelope provided by a 30 degree plane, measured from a height of 3 metres above natural ground level at the zone boundary (except where this boundary is a primary road frontage), as illustrated in Figure 1:*



The intent behind this provision is to ensure that multi-storey building heights should scale down proportionally, where such developments are proposed adjacent existing low-rise developments and to address the overshadowing and visual amenity impacts of tall buildings.

In respect to the prescribed building heights included in the draft DPA, Council staff have undertaken an analysis of whether the maximum building heights could actually be achieved on the affected sites, given the depth of the sites and taking into account the building envelope requirement and a minimum viable construction depth.

The analysis has shown that for some of the sites, it would be very difficult to achieve built form outcomes to the prescribed heights, when tested against the building envelope height-capping formula and or having regard to interface provisions which require the reduction of building scale and mass when located in close proximity to adjacent low rise residential development.

Setting height limits which cannot be realistically achieved due to the interface height provisions, creates difficulty when assessing Development Applications and ultimately only one or the other policies can be achieved. Reducing the height limit to match the maximum height which can be relatively achieved, is a far more sensible approach, whilst still providing descent ‘uplift’ opportunities.

Comments on Sites located within the City of Norwood Payneham & St Peters

Site 1: 95 Hackney Road, Hackney (including Hackney Hotel and adjacent land owned by SA Housing Trust)

The inclusion of Site 1, to allow for mixed-use medium density developments, is supported, subject to the following comments on the proposed parameters:

- The allowance of six (6) storey built form fronting Hackney Road will not provide for an appropriate contextual relationship with the heritage listed Hotel or existing dwellings along Hackney Road to the south of the subject land. Consideration should be given to requiring a two-storey podium treatment to buildings fronting Hackney Road, with taller parts of buildings recessed towards the centre of the site.
- Regardless of setback requirements and the suitability of the site to enable appropriate scaling down and transition of built form downwards adjacent low scale residential developments, the proposed six (6) storey maximum height limit in this location is considered to be excessive, from the perspective of the intensity of the resultant use.

In particular, there is concern over how vehicle movements, off-street parking, provision of private open space etc. can all be catered for with a six (6) storey building on the site.

Significant basement (multi-level) car parking would need to be provided and significant space at ground level would need to be set aside for open space/people movements/ recreation. A six (6) storey building in this location also makes overshadowing difficult to manage, both within and outside of the site and may result in additional on-street parking pressures in the adjacent locality. In this context, the Council considers that a development in the order of four (4) storeys may be more appropriate for the site.

A less intense, four (4) storey development, with podiums and or lower scale built form adjacent the site boundaries, would still allow for a substantial re-development opportunity, whilst ensuring new buildings would 'fit' more comfortably within the existing low scale residential surrounds that characterise the immediate locality. In short, the policy needs to take into account "context".

- The proposed four (4) storey maximum building height for development adjacent Richmond Street, is higher than and inconsistent with the 1:1 street width ratio concept and is not supported. Application of the ratio reveals that the maximum height of a building adjacent Richmond Street should be capped at three (3) storeys to maintain an appropriate 'human scale' at pedestrian level, whereas a maximum height of four (4) storeys is proposed in the draft DPA on the basis that the site is located adjacent the Adelaide Caravan Park, where up to four (4) storey development is contemplated.

The additional height has not been justified and is based on a flawed understanding of the building heights policy applicable for development on the Adelaide Caravan Park site. The current policy for the Adelaide Caravan Park site, allows for primarily three (3) storey development set back behind lower scale, single storey development along the Richmond Street frontage of the site, with development of four storey buildings contemplated only in the centre of that site. In this context, allowing four (4) storey development on the Hackney Hotel Site adjacent Richmond Street would not provide an appropriate contextual relationship with existing or contemplated future development on the Adelaide Caravan Park site, having regard to the existing zoning parameters for that site, and therefore should not be supported.

A maximum height of three (3) storeys for developments fronting Richmond Street is strongly recommended.

- Inclusion of inter-war character bungalows in Bertram Street within the new zone boundary, is not supported. Inclusion of these bungalows will remove current demolition controls and incentivise their demolition and replacement with development of up to six (6) storeys, in a street which currently comprises a predominantly single storey character. The overall scale of development that could be delivered across the site, if the bungalow properties were excluded from the re-zoning would not be unreasonably compromised.

Site 2: 1-5 Beulah Road, Norwood

The inclusion of Site 2, to allow for mixed-use medium density developments, is supported, subject to the following comments on the proposed parameters:

- The site at 1-5 Beulah Road, Norwood, is a corner site, with good accessibility to the heart of Kent Town, the Adelaide CBD and public transport and is located adjacent the Beulah Road Bicycle Boulevard route. It is surrounded by a mix of commercial and residential land uses and a mix of single, two and three storey developments. In this context, the inclusion of both sites in the draft DPA, to facilitate new mixed use medium density development is supported.

- The site at 1-5 Beulah Road, Norwood, was not included in the affordable housing overlay, presumably on the basis that the subject land is relatively small (1800m²) and unlikely to generate a substantial dwelling yield, having regard to the proposed four storey height limit and factoring in setback requirements and other design constraints, such as the provision of lifts and services and the likelihood that the ground and first floor levels will be primarily developed for commercial purposes.

Notwithstanding this, the rationale for excluding 1-5 Beulah Road, Norwood, from the affordable housing overlay map, should be questioned, given the realistic possibility that a development proposal including more than twenty (20) dwellings could be submitted and approved for this site.

- The proposed four (4) storey maximum building height takes into account the location of the site investigation areas within the Mixed Use Historic (Conservation) Zone, significant heritage places in the locality and the scale of the sites to allow increased building heights and residential densities while managing the interface with adjacent development. Whilst this aspect of the draft DPA is supported, the absence of a Desired Character Statement for 1-5 Beulah Road, Norwood, is questioned and appears to be a critical oversight.

Without a Desired Character Statement for the site, the existing provisions in the *Mixed Use Historic (Conservation) Zone - The Parade / Fullarton Road Policy Area*, provide insufficient guidance against which to assess new developments for this site and there is no maximum building height reference contained in the existing Policy Area provisions, aside from a reference in the updated Strategic Growth Concept Plan map for the Policy Area.

It is therefore recommended that a Desired Character Statement be drafted in respect to 1-5 Beulah Road, Norwood, to include an emphasis on a maximum building height of four (4) storeys and the management of interface issues with adjacent development, particularly the residential development to the east. The Desired Character Statement should also make reference about preferred vehicular access arrangements, given the location of the site on a very busy intersection, heavily trafficked by vehicles, cyclists and pedestrians.

- Retention of the Mixed Use Historic (Conservation) Zone - The Parade / Fullarton Road Policy Area for the entire site, is supported.
- Adjustments to public notification requirements to allow buildings up to three (3) storeys as Category 1 development, with buildings exceeding three (3) storeys to be classed as Category 2 development (notification to adjoining properties), is supported.
- Adjustment to non-complying criteria to allow shops or groups of shops greater than 250 square metres to be assessed on merit, is supported.

Site 3: 78-80 Rundle Street, Kent Town

The inclusion of Site 3, to allow for mixed-use medium density developments, is supported, subject to the following comments on the proposed parameters:

- The inclusion of 78-80 Rundle Street, Kent Town, to allow for a more intensive development on this site than what the current zoning allows for, is considered appropriate. The site is located within the 'heart' of Kent Town and the only reason for the existing H(C)Z zoning is due to the surrounding heritage properties. Due to the relatively large size of the site, there is an opportunity to develop it in a manner that respects nearby heritage listed properties.
- The proposed four storey maximum building height and downward transition to three (3) storeys for development adjacent residential areas along Grenfell Street, is supported.
- The building setback beyond the two-storey podium scale envisaged for new development on the site adjacent Rundle Street and College Road frontages, should be the same as that which is required for the High Street Policy Area of the adjacent Urban Corridor Zone, ie. 3 metres (PDC 4(b)), not 2 metres as is proposed in the Desired Character Statement for this site.

This would provide a better relationship of new built form with existing lower scale heritage listed buildings on adjacent sites.

- The inclusion of the statement in the Desired Character Statement that “*vehicle access should be provided via a common driveway to the rear of dwellings*”, is not supported. Whilst this configuration would solve some potential issues such as dominance of garages on Little Grenfell Street, it may not be the best solution for other potential development options for the site. For example, basement parking across the majority of the site would eliminate the need for at-grade parking and driveways and provide opportunities for more appropriate common space at ground level.

Site 4: 76 Magill Road, Norwood (Caroma and Alma Hotel site)

The inclusion of Site 4, to support mixed-use medium to high density developments, is supported, subject to the following comments on the proposed parameters:

- the proposed six (6) storey maximum height is supported, given the large size of the site and the capacity to appropriately address amenity, transition and interface issues with a well-designed and master planned development.

Given the large scale and width of the site, there is an opportunity to enhance cross-permeability, connectivity and accessibility for pedestrians in a north-south direction and this should be included in the Desired Character Statement. Providing good connectivity across the site will provide residents and workers safe and convenient access between Chimney Park on the southern side of Stephen Street and Magill Road.

- Given the large scale and intensity of any new development on the Caroma site, provision should be made for the widening of Stephen street, via the vesting of a portion of the site to the Council, so as to provide for safer and more convenient vehicular access and egress and a safer pedestrian environment in the public realm adjacent the site.

Site 5: 52-60 The Parade, Norwood (Beaurepaires Site)

The consolidated nature of land holdings within the investigation area and its location adjacent the existing Norwood District-level Activity Centre, provides an opportunity to facilitate a future mixed-use development with a residential focus that takes advantage of current and future transport options, including potential mass transit. However, whilst the location of the site is suitable, its juxtaposition with adjacent low rise residential development and the relatively shallow depth of the site brings into question the suitability of the site for the scale and building heights proposed in the draft DPA.

The inclusion of Site 5, to allow for mixed-use medium to high density developments, is supported, but not at the scale proposed and subject to the following comments on the proposed parameters:

- The site investigations section of the draft DPA, suggests that the depth of the site is sufficient to allow a medium-rise development of up to five (5) storeys, while allowing for interface impacts to be managed for adjacent sensitive residential development and character / conservation areas. This conclusion is questioned.

Whilst existing policies in the wider Urban Corridor Zone, which seek to minimise building massing at the interface with sensitive residential development outside of the zone, will apply through use of a 30 degree building envelope, the Desired Character Statement in the proposed Transit Living Policy Area, suggests that the tallest buildings in a new development should front The Parade and scale down to residential development adjacent the Zone.

The 'front end' design approach does not reflect the more detailed policy contained in the adjacent District Centre (Norwood) Zone, which calls for *'the reinforcement of The Parade's character through well-defined low to medium scale built form edge abutting the footpath and continuing the established width, rhythm and pattern of facades. To maintain a human scale at street level, the upper levels of buildings will be recessed behind the dominant two (2) and three (3) storey podium street wall heights.'* In the Parade West Policy Area, located closest to the subject land, the required podium height is two (2) storeys.

The design approach set out in the District Centre (Norwood) Zone provisions, should be applied to Site 5, with a two (2) storey podium requirement specified, so as to ensure new developments reinforce the 'main street' scale of The Parade. However, if such a design approach is required for Site 5, it would in turn make it very difficult to develop a building on the site that provides a meaningful podium with a recessed taller building of five (5) storeys, that can also transition down in scale to minimise its impact on adjacent residential developments. In part, this is because the depth of the site may be insufficient to achieve a sustainable design comprising a two storey podium, well-recessed five storey building component and a low scale building form adjacent to abutting residential development to the rear.

Further analysis of the maximum building heights suitable for Site 5 is required and a maximum height in the order of three (3) or four (4) storeys may be more appropriate as the proposed five (5) storey maximum building height limit, does not sufficiently have regard to the context of the locality.

Retention of the five (5) storey maximum building height creates an unworkable policy framework, in which either the building envelope requirement would need to be disregarded in the assessment of development applications that propose the maximum prescribed building height, or the maximum building height allowed will need to be significantly negotiated downwards, in order to achieve compliance with the building envelope policy.

Site 12: Magill Road, Stepney (including Otto's Timber and shopfront properties facing Magill Road between Nelson St and Frederick St)

The inclusion of Site 12 to support mixed-use medium density developments is generally supported, subject to the following comments on the proposed parameters:

- The Council generally concurs with the proposed policy framework and notes that the overall size of the Otto Timber facility makes it suitable to accommodate a building of up to five (5) storeys, whilst managing interface issues with adjacent residential properties, particularly with a downward transition in scale and mass at the site boundaries.
- The inclusion of properties fronting Magill Road in the Zone, requires a more robust policy setting and commentary in the Desired Character Statement so as to manage expectations around the extent of protection afforded to the Local Heritage Place shopfronts. Without such guidance, there could be an expectation that only the facades of shopfronts need be retained, which, if applied in such a manner, would significantly erode the character of this character/historic shopping strip.
- The inclusion of 4 Bennett Street within the site is questioned. The property contains a character dwelling, is located within a low scale residential part of Bennett Street and due to the limited depth of the land, would be difficult to develop without impacting on surrounding residential properties. The property is also separated from 2 Bennett Street by a private laneway that appears to service residential properties on Frederick Street. As such, the subject land does not appear to have a contiguous relationship with 2 Bennett Street.
- Given the long standing industrial nature of the Otto Timber factory, it is suggested that some further investigations need to be undertaken to ascertain the site history and the likelihood and extent of any contamination that may affect the viability of a future re-development of the site. It is not considered appropriate to address any site contamination issues solely as part of the assessment of Development Applications for the site as 'up front' investigations may influence the final policy framework proposed.

- A review of flood plain mapping for the subject land has revealed that in a 1 in 100 ARI storm event, some of the site may be affected by low level flooding. Whilst it is likely that the risk of flooding could be addressed through appropriate design, further 'up front' investigations are warranted and are therefore recommended.

A table containing a summary of the Council's submission and comments on the draft DPA, is attached for your consideration.

Community Consultation and Engagement

The Council also wishes to express its disappointment with the State Government's handling of the community engagement and community consultation processes, associated with the draft DPA.

It was the Council's understanding that during the statutory consultation period (prescribed as a minimum of eight (8) weeks), the community would be engaged and informed about the draft DPA, through press advertisements, website information and the hosting of two Public Information Sessions. However, given the 'site specific' nature of the draft DPA, the extent of 'uplift' development opportunities proposed for the twelve (12) affected sites and the likely impact that future developments on those sites will have on the amenity of local communities, the Council strongly believes that there was a need "to go above and beyond" minimum consultation and engagement standards, to ensure that local communities and adjoining property owners, who are directly affected by the site specific re-zoning proposals, are informed of the draft DPA and engaged in a meaningful way.

Prior to the commencement of the consultation period for the draft DPA, Council staff raised concerns about the extent and generic nature of the community consultation and engagement processes which was proposed, with staff from that the Department of Planning, Transport and Infrastructure. Council staff specifically requested the Department write to property owners and occupiers located within approximately 100 metres of the affected development sites, to advise of the proposed policy changes and how citizens can make a submission. Unfortunately, this request was initially declined by the Department.

Following numerous requests, Department staff agreed to undertake a 'postcard' drop to property owners and occupiers located within approximately 100 metres of the affected development sites. However, in the opinion of Council staff, the content of the postcard was too general, made no reference to the location of the affected sites, was delivered only the day prior to the first scheduled public information session and was generally a well-intended, but was a poor attempt to inform local communities of the draft DPAs.

It is understood that only fifteen (15) people attended the first public information session which was held in Norwood, which most likely reflects a lack of community knowledge about the draft DPA. I understand that approximately fifty (50) people attended the second public information session held in Wayville, which was held after the postcard drop was undertaken.

Given the limited value and impact of the Department's 'postcard drop', the Council took the initiative to write to owners and occupiers of properties located within approximately 100 metres of the affected development sites, advising of the DPAs, the location of the affected sites and how to make a submission in an attempt to further heighten local community awareness of the draft DPAs.

The Department's reluctance "to go above and beyond" the minimum consultation and engagement standards to ensure that local communities, which are directly affected by the site specific re-zoning proposals, are informed of the draft DPA and engaged in a meaningful manner, is not only disappointing, but has unnecessarily shifted a substantial administrative task to the Council and most importantly, represents the very antithesis of the Government's messaging regarding the proposed Community Engagement Charter under the *Planning, Development and Infrastructure Act 2016*, which is to '*put engagement at the forefront of the planning system*'.

If the State Government is serious about "doing things differently" when it comes to engaging South Australian communities about shaping the State's planning future, then it is imperative that the Government lifts its own standards regarding community engagement and consultation, particularly those associated with Ministerial DPAs.

These concerns regarding the consultation process have also been raised with the Minister for Planning.

Thank you once again for the opportunity to provide comments on the draft DPA. The Council requests that representatives from the Council be given the opportunity to make a verbal presentation in support of the Council's submission, at the Public Meeting which is scheduled for Tuesday, 8 August 2017.

If you have any questions regarding the Council's submission, please contact me or the Council's General Manager, Urban Planning & Environment, Carlos Buzzetti on 8366 4501 or email cbuzzetti@npsp.sa.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Mario Barone', with a long, sweeping horizontal line extending to the right.

Mario Barone PSM
CHIEF EXECUTIVE OFFICER

Att.

Inner and Middle Metropolitan Corridor (Sites) DPA

Norwood Payneham and St Peters (City) Development Plan

Urban Corridor and Mixed Use Historic (Conservation) Zone Policy – Council Comments

The Council strongly opposes the progression of the *draft Inner and Middle Metropolitan Corridor (Sites) DPA*, on the basis that it is fundamentally inequitable and without strategic basis. Notwithstanding this, if the draft DPA is to be progressed, the Council offers the following comments on the proposed policy changes. A 'tracked changes' version of the policy modules for comparison and suggested policy edits with supporting comments, is set out below. Map reference updates and minor changes that introduce the name of the sites proposed for inclusion in the draft DPA have not been included in the table below.

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>		NPSP Council Comments										
URBAN CORRIDOR ZONE												
Form and Character												
5 When abutting a footpath, the finished floor level of the ground floor of buildings should be level with the footpath at the primary street frontage, provided the footpath is constructed to an appropriate level to mitigate flood risk at the edge of the development site.		This provision requires further analysis to ensure it does not contradict with any accessibility requirements set out in the <i>Disability Discrimination Act 2017</i> and or the Building Code of Australia.										
Building Envelope												
6 Residential development in a wholly residential building should aim to achieve a target minimum net residential site density in accordance with the following:												
<table><tr><th>Policy Area</th><th>Minimum net residential site density</th></tr><tr><td>Boulevard</td><td>100 dwellings per hectare</td></tr><tr><td>High Street</td><td>70 dwellings per hectare</td></tr><tr><td>Business</td><td>no minimum density</td></tr><tr><td>Transit Living</td><td>45 dwellings per hectare</td></tr></table>		Policy Area	Minimum net residential site density	Boulevard	100 dwellings per hectare	High Street	70 dwellings per hectare	Business	no minimum density	Transit Living	45 dwellings per hectare	This inclusion is supported as it reflects requirements set out in a Policy Area, not previously included in the Council's Development Plan.
Policy Area	Minimum net residential site density											
Boulevard	100 dwellings per hectare											
High Street	70 dwellings per hectare											
Business	no minimum density											
Transit Living	45 dwellings per hectare											

Inner and Middle Metropolitan Corridor (Sites) DPA (Text in red denotes new or amended policy) (Text in black denotes existing wording in Development Plan) (Text in blue denotes recommended edits to proposed policy)			NPSP Council Comments
<p>14 Except where airport building height restrictions prevail, or the interface height provisions require a lesser height, or where an alternative maximum building height is shown on Concept Plan Fig UrC/1, building heights (excluding any rooftop mechanical plant or equipment) should be consistent with the following parameters:</p>			<p>This inclusion is supported for Otto's Timber site as it reflects requirements set out in a Policy Area, not previously included in the Council's Development Plan. However, a minimum height of 3 storeys for Site 5, 52-60 The Parade, Norwood is not supported. Two storey podium height adjacent The Parade is recommended for consistency with desired 'main street' character for The Parade.</p>
Policy area	Minimum building height	Maximum building height	
Boulevard	3 storeys or no less than 11.5 metres, or 4 storeys or no less than 15 metres for land that is directly adjacent to or facing the Adelaide Park Lands	10 storeys and up to 36 metres	
High Street	3 storeys or no less than 11.5 metres	5 storeys and up to 18.5 metres	
Business	3 storeys or no less than 11.5 metres	5 storeys and up to 18.5 metres	
Transit Living	3 storeys or no less than 11.5 metres	5 storeys and up to 18.5 metres	
<p>15 Buildings (excluding verandahs, porticos and the like) should be set back from the primary road frontage in accordance with the following parameters:</p>			
Policy Area	Minimum setback from the primary road frontage where it is the Primary Road Corridor as shown on Concept Plan Fig UrC/1 and UrC/2 .	Minimum setback from the primary road frontage in all other cases	
Boulevard Policy Area	4 metres from the Dequetteville Terrace, North Terrace, Magill Road and Fullarton Road Primary Road Corridors	2 metres	
High Street Policy Area	No minimum	2 metres	
Business Policy Area	No minimum	2 metres	
Transit Living Policy Area	No minimum	2 metres	<p>This inclusion is supported as it reflects requirements set out in a Policy Area, not previously included in the Council's Development Plan.</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>			NPSP Council Comments
<p>16 Buildings (excluding verandahs, porticos and the like) should be set back from the secondary road frontage or a vehicle access way in accordance with the following parameters:</p>			
Policy area	Minimum setback from a secondary road (where the secondary road is not a rear access way or laneway)	Minimum setback from a rear access way (or laneway)	
Boulevard Policy Area	No minimum	1 metre where the access way is 6.5 metres or more in width OR Where the access way is less than 6.5 metres in width, the additional width required to make the access way 6.5 metres, to provide adequate manoeuvrability for vehicles, plus 1 metre	
High Street Policy Area	No minimum	1 metre where the access way is 6.5 metres or more in width OR Where the access way is less than 6.5 metres in width, the additional width required to make the access way 6.5 metres, to provide adequate manoeuvrability for vehicles, plus 1 metre	
Business Policy Area	No minimum	1 metre where the access way is 6.5 metres or more in width OR Where the access way is less than 6.5 metres	

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>				NPSP Council Comments
			in width, the additional width required to make the access way 6.5 metres, to provide adequate manoeuvrability for vehicles, plus 1 metre	This inclusion is supported as it reflects requirements set out in a Policy Area, not previously included in the Council's Development Plan.
	Transit Living Policy Area	No minimum	<p>No minimum where the access way is 6.5 metres or more</p> <p>OR</p> <p>Where the access way is less than 6.5 metres in width, the additional width required to make the access way 6.5 metres, to provide adequate manoeuvrability for vehicles</p>	
URBAN CORRIDOR – DESIRED CHARACTER STATEMENT <p>New Inclusion - <u>Area F – Hackney Road, Hackney</u></p> <p>Area F, shown on Concept Plan <u>Fig UrC/2</u>, comprises the Hackney Hotel and adjoining SA Housing Trust dwellings that front Richmond Street and Bertram Street. The site provides an opportunity for development of up to six (6) storeys fronting Hackney Road and four (4) storeys fronting Richmond Street, incorporating a mixture of commercial and medium to high density residential development. The site's four frontages to Hackney Road (west), Richmond Street (north), Hatswell Street (east) and Bertram Street (south) provide the opportunity for development to respond in a variety of ways to the variable environments that form its context.</p> <p>Development within Area F should incorporate landscaping to enhance streetscapes and, where commercial activities are developed at the ground floor, active and transparent street frontages to provide interest and vitality.</p>				<p>The allowance of six (6) storey built form fronting Hackney Road will not provide for an appropriate contextual relationship with the heritage listed Hotel or existing dwellings along Hackney Road. Consideration should be given to requiring a two-storey podium treatment to buildings fronting Hackney Road, with taller parts of buildings recessed towards the centre of the site.</p> <p>Regardless of setback requirements and the suitability of the site to enable appropriate scaling down and transition of built form downwards adjacent low scale residential developments, the proposed six (6) storey maximum height limit in this location is excessive, from the perspective of</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>Development adjacent to, or on the same site as, the historic Hackney Hotel building will be respectful of its heritage character and setting, and sensitively interface with the original building form.</p> <p>The mass of the upper levels of buildings should be 'broken up' into well-articulated building elements in order to minimise the visual and overshadowing impacts of tall buildings, particularly in relation to adjacent residential areas. The built form along Hatswell Street and Bertram Street, in particular, will be of a scale which provides an appropriate transition down to the scale of buildings on the adjacent allotments.</p> <p>Vehicle access should be provided via a common driveways to the rear of dwellings.</p>	<p>the intensity of the resultant use.</p> <p>Significant basement (multi-level) car parking would need to be provided and significant space at ground level would need to be set aside for open space/people movements/ recreation. A six (6) storey building in this location also makes overshadowing difficult to manage, both within and outside of the site and may result in additional on-street parking pressures in the adjacent locality. In this context, a development in the order of height which was previously considered (4 storeys) may be more appropriate for the site.</p> <p>A less intense, four storey development, with podiums and or lower scale built form adjacent the site boundaries would still allow for a substantial re-development opportunity, whilst ensuring new buildings would 'fit' more comfortably within the existing low scale residential surrounds that characterise the immediate locality.</p> <p>The proposed four storey maximum building height for development adjacent Richmond Street is higher than and inconsistent with the 1:1 street width ratio concept and is not supported. Application of the ratio reveals that the maximum height of a building adjacent Richmond Street should be capped at three (3) storeys to maintain an appropriate 'human scale' at pedestrian level, whereas a maximum height of four (4) storeys is proposed in the draft DPA on the basis that the site is located adjacent the Adelaide Caravan Park, where up to four (4) storey development is contemplated.</p> <p>The current policy for the Adelaide Caravan Park site allows for primarily three storey development set back behind lower scale, single storey development along the Richmond Street frontage of the site, with development of four storey buildings contemplated only in the centre of that site. In this</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>HIGH STREET POLICY AREA</p> <p>DESIRED CHARACTER STATEMENT</p> <p>The High Street Policy Area will enable the be developed of retail and pedestrian hubs in Kent Town, Norwood and Stepney with a focus on smaller scale specialty shops and businesses, restaurants and cafes, which serve the local community.</p> <p>The western portion of Rundle Street and The Parade West will form the Primary Road Corridors within the High Street Policy Area, which will be developed with a strong focus on the pedestrian environment and the movement of pedestrians and bicycles between the City and the Eastern suburbs. Except within Area E (shown on Concept Plan Fig UrC/1), which provides greater development opportunities due to the size of the site and the topography of the land, the secondary streets, including Grenfell Street and College Road will provide opportunities for a lower intensity and scale of development than that found along the Primary Road Corridors.</p> <p>It is anticipated that at some time in the future, Rundle Street may be the preferred option for the location of a mass public transport link between the City and The Parade. In this context, bicycle lanes should be maintained and upgraded along the length of Rundle Street, linking into Beulah Road at the eastern end.</p> <p>New development should not rely on the creation of new vehicle access points along Rundle Street and The Parade West, with vehicle access directed to side streets and rear laneways where possible.</p> <p>The built form within the High Street Policy Area will establish a rhythm and pattern of facades that support a variety of tenancies with narrow building frontages of a scale and rhythm that reflects adjacent development. The locality will generally comprise buildings of up to five (5) storeys except where taller buildings are anticipated on Concept</p>	<p>context, allowing four (4) storey development on the Hackney Hotel Site adjacent Richmond Street would not provide an appropriate contextual relationship with existing or contemplated future development on the Adelaide Caravan Park site, having regard to the existing zoning parameters for that site, and therefore should not be supported.</p> <p>A maximum height of three storeys for developments fronting Richmond Street is recommended.</p> <p>Policy changes to High Street Policy Area DCS supported.</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>Plan Fig UrC/2 with a podium or street wall height of two (2) storeys. Above the podium/street wall component, additional storeys will be set back a minimum of three (3) metres so as to be visually recessive and to maintain a lower-scale feel along the High Street.</p> <p>Development will enhance the pedestrian environment of Rundle Street and The Parade West through the provision of verandahs, pergolas and awnings to provide pedestrian protection and achieve a human scale and visually interesting environment. Where possible, verandahs and pergolas constructed over the footpath will be cantilevered to reduce the possibility of damage by vehicles.</p> <p>On-street car parking will continue to be maintained along the length of Rundle Street and the eastern side of The Parade West to contribute to the shorter term visitor parking needs of local businesses and provide some separation between the vehicle carriageway and the footpath.</p> <p>New High Street Policy Area Desired Character Inclusions – Area H & Area I</p> <p><i>Area H</i></p> <p>Area H, shown on Concept Plan Fig UrC/2, comprises the former Caroma industrial site together with a State heritage listed place (the Alma Hotel). The site provides an opportunity for development of up to six (6) storeys incorporating a mixture of commercial and medium density residential development. The site's three frontages to Magill Road, Sydenham Road and Stephen Street, a narrow road to the rear of the site, provide opportunity for the development to respond to the site in a number of innovative ways to the characteristics of the locality.</p> <p>Development on the ground floor fronting Magill Road should consist of commercial activities in the form of shops, consulting rooms, offices or cafes / restaurants that serve the daily needs of local residents. Such development is also encouraged to Sydenham Road where possible. Upper levels should be devoted to medium density residential development.</p> <p>Development should be cognisant of the strong heritage and character nature of the locality, particularly south of the site. Buildings with large frontages should be strongly articulated to create visual interest. Although the site is separated from adjoining residential development to the south by a narrow roadway, building heights will transition down to a level that complements the adjacent residential character area.</p> <p>Vehicle access should be provided from Stephen Street via common</p>	<p>Area H – Caroma Site</p> <p>Area H description generally supported, but recommend additional wording to encourage better, publicly accessible north-south connectivity through the centre of the site to improve pedestrian movement within the site and accessibility to the adjacent Chimney Park and Magill Road for local residents and workers.</p> <p>Also, consider including requirement for the widening of Stephen Street, to provide for safer and more convenient vehicular access and egress and safer pedestrian environment in the public realm adjacent the site.</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>driveways and / or to the rear of dwellings.</p> <p>Area I</p> <p>Area I, shown on Concept Plan Fig UrC/2, comprises the former Otto's Timber industrial site together with a number of Local Heritage listed places fronting Magill Road. That area fronting Magill Road contains a significant proportion of Local Heritage Places adapted for commercial and retail purposes. The fine-grained heritage character of these buildings fronting Magill Road will be retained as they contribute significantly to the character of the streetscape and broader area.</p> <p>The High Street portion of the larger site provides an opportunity for development of up to four (4) storeys incorporating a mixture of commercial and medium density residential development. This may be incorporated into the broader site which is located in the Transit Living Policy Area of the Urban Corridor Zone. The multiple means of road access provides opportunity for an innovative development format.</p> <p>Development should be cognisant of the strong heritage and character nature of the locality. New development should be strongly articulated to create interest and character that complements heritage sites.</p> <p>Vehicle access should be provided via a common driveway and / or to the rear of dwellings.</p> <p>PRINCIPLES OF DEVELOPMENT CONTROL</p> <p>2 A shop or a group of shops contained in a single building, should have a maximum total gross leasable floor area in the order of 1000 square metres, except where located in Area H shown on Concept Plan Fig UrC/2 where a maximum total gross leasable floor area in the order of 2000 square metres is anticipated.</p> <p>New Policy Area inclusion for Urban Corridor Zone</p> <p>Transit Living Policy Area</p> <p>The following objectives, desired character statement and principles of development control apply in the Transit Living Policy Area shown on Policy Area <u>Maps NPSP/14, 15 and 16</u>. These provisions are additional to those expressed for the Urban Corridor Zone and the whole of the Council area in the City Wide section.</p>	<p>Area I – Otto's Timber</p> <p>The inclusion of properties fronting Magill Road in the Zone requires a more robust policy setting and commentary in the Desired Character Statement so as to manage expectations around the extent of protection afforded to the Local Heritage Place shopfronts. Without such guidance, there could be an expectation that only the facades of shopfronts need be retained, which, if applied in such a manner, would significantly erode the character of this character/historic shopping strip.</p> <p>Inclusion of Transit Living Policy Area is generally supported.</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>OBJECTIVES</p> <p>Objective 1: A medium density residential area supported by local shops, offices and community land uses.</p> <p>Objective 2: A highly varied built streetscape allowing multiple built form design responses that support innovative housing and mixed use development.</p> <p>Objective 3: Development that contributes to the desired character of the policy area.</p> <p>DESIRED CHARACTER</p> <p>The Transit Living Policy Area will contain predominantly medium density residential development, together with some local shops, offices and community land uses to support the daily needs of residents. There will be a variety of building forms and design, creating housing opportunities for a diversity of people and accommodating a variety of small businesses that do not compromise residential amenity.</p> <p>New buildings will contribute to a highly varied built streetscape, allowing multiple built form design responses that support innovative housing and mixed-use development. Buildings up to five (5) storeys are anticipated, providing a strong presence to the main road with the tallest buildings fronting The Parade and scaling down to residential development adjacent the zone. Balconies and windows will face the street to provide passive surveillance.</p> <p>Heritage places will be adapted, maintaining their heritage qualities with redevelopment occurring to the rear and behind the front facades. Buildings adjacent to these heritage buildings will contain design elements and building materials that are complementary to such buildings.</p> <p>Safe and efficient pedestrian movement along arterial roads as well as for transport networks is a priority and facilities will be supported by limiting vehicle access points from these roads. Vehicle access will instead be from the side and rear of sites, where possible, and the development of laneways is encouraged. Parking and garages will be located behind the front façade of buildings. This will also support the retention/planting of street trees on arterial roads.</p> <p>Development will be interspersed with landscaping, particularly behind the main street frontage, to soften the appearance of buildings from the street and reduce heat load in summer.</p>	

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p><i>Area J</i></p> <p>Area J, shown on Concept Plan Fig UrC/2, comprises a range of land uses including office, service industry and retail showrooms. The site provides an opportunity for development of up to five (5) storeys, incorporating a mixture of commercial and medium density residential development. The site's frontage to The Parade and Sydenham Road provide opportunity for development to capture the small-scale and intensive development activities of the District Centre of Norwood.</p> <p>Development should seek to create a vibrant and active street frontage with commercial activities on the ground floor promoting transparent and / or articulated frontages for interest. Upper storeys should be articulated to create interest and reflect the historic fine-grained pattern of development. Development heights to the rear (south) should transition down to a level that complements the adjacent historic and character residential areas.</p> <p>Vehicle access should be provided via common driveways to the rear of dwellings.</p> <p><i>Area I</i></p> <p>Area I, shown on Concept Plan Fig UrC/2, comprises the former Otto's Timber industrial site together with a number of Local Heritage listed places fronting Magill Road. That area fronting Magill Road is addressed by the High Street Policy Area, where as development to the rear is included in the Transit Living Policy Area. The area to the rear provides a significant opportunity for medium density residential development. Commercial development, consisting of shops, offices, consulting rooms, café's and the like that are compatible with the residential development atop are supported. The site provides an opportunity for development of up to five (5) storeys and may be combined with the adjacent frontage to Magill Road located in the High Street Policy Area.</p> <p>The site has access to multiple local roads and laneways, providing opportunity for innovative design solutions and contemporary design approaches – however, this will need to be tempered by cognisance of the site's location adjacent historic and character residential areas. Development will therefore need to be strongly articulated, avoid overshadowing of adjacent areas and heights should transition down</p>	<p>Area J - 52-60 The Parade, Norwood</p> <p>Further analysis of the maximum building heights suitable for Site 5 is required and a maximum height in the order of three (3) or four (4) storeys may be more appropriate as the currently proposed five (5) storey maximum building height limit does not sufficiently have regard to the context of the locality.</p> <p>Retention of the five (5) storey maximum building height creates an unworkable policy framework, in which either the building envelope requirement would need to be disregarded in the assessment of development applications that propose the maximum prescribed building height, or the maximum building height allowed will need to be significantly negotiated downwards, in order to achieve compliance with the building envelope policy.</p> <p><i>General Comments about Otto Timber site</i></p> <p>The inclusion of 4 Bennett Street within the site is questioned. The property contains a character dwelling, is located within a low scale residential part of Bennett Street and due to the limited depth of the land, would be difficult to develop without impacting on surrounding residential properties. The property is also separated from 2 Bennett Street by a private laneway that appears to service residential properties on Frederick Street. As such, the subject land does not appear to have a contiguous relationship with 2 Bennett Street.</p> <p>Given the long standing industrial nature of the Otto Timber factory, it is suggested that some further investigations be undertaken to ascertain the site history and the</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>to complement adjacent residential areas.</p> <p>Vehicle access should be provided via a common driveways and / or to the rear of dwellings.</p> <p>PRINCIPLES OF DEVELOPMENT CONTROL</p> <p>Land use</p> <p>1 Shops or groups of shops contained in a single building should have a maximum gross leasable floor space in the order of 500 square metres.</p> <p>Form and Character</p> <p>2 Development should be consistent with the desired character for the policy area.</p> <p>MIXED USE HISTORIC (CONSERVATION) ZONE</p> <p>DESIRED CHARACTER STATEMENT</p> <p>The character of the Mixed Use Historic (Conservation) Zone is primarily established by the nature and appearance of the historic buildings and their settings within each of the policy areas. In particular, the traditional character of the commercial buildings, which are a significant element of the zone and most of the policy areas, will continue to be preserved and re-used. Although some of the original shops have been altered over time, many of the significant streetscape elements, such as the timber shopfronts and verandahs, still remain and will continue to be preserved.</p> <p>The Mixed Use Historic (Conservation) Zone will continue to consist primarily of offices, consulting rooms, dwellings and other compatible uses, in both preserved and converted buildings which contribute</p>	<p>likelihood and extent of any contamination that may affect the viability of a future re-development of the site. It is not considered appropriate to address any site contamination issues solely as part of the assessment of Development Applications for the site as 'up front' investigations may influence the final policy framework proposed.</p> <p>A review of flood plain mapping for the subject land has revealed that in a 1 in 100 ARI storm event, some of the site may be affected by low level flooding. Whilst it is likely that the risk of flooding could be addressed through appropriate design, further 'up front' investigations may be warranted.</p> <p>New land use and form and character PDCs supported.</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>positively to the historic character of the zone. Townhouses and residential apartment buildings of a scale consistent with the locality, will also be developed, other than in the Portrush Road Policy Area.</p> <p>Over time redevelopment will occur on sites which are incompatible with the historic character of the Zone and the relevant Policy Area.</p> <p>New development will conserve, enhance and complement the existing heritage places and contributory items, including the use of appropriate landscaped settings and traditional design elements, such as fences, verandahs, balconies and hipped and gabled roofs. New development will be carefully integrated into the established streetscape, without creating mock historic buildings. The siting of new buildings will continue the alignment of adjacent heritage places and contributory items and incorporate the use of verandahs over footpaths, where appropriate. Reflective glass and brightly coloured schemes will not be used. Finishes will be carefully chosen to complement the finishes of surrounding buildings.</p> <p>Extensions and additions to heritage places and contributory items, where possible, will be undertaken at the rear of a building and preferably not be visible from the primary street frontage. They will be in a style which reflects the form and detailing of the original sections of the building and will be similar in scale to the original building. Any extensions or alterations to heritage listed buildings or contributory items will seek to retain original materials and finishes particularly unpainted brickwork, stonework and the use of original corrugated iron roofing material.</p> <p>Carparking will be sensitively positioned, preferably at the rear of the building so as not to detract from the established streetscape character.</p> <p>Tables NPSP/5, 6 and 7 list and identify the places and items, which make a direct and positive contribution to the Mixed Use Historic (Conservation) Zone and reinforce the historic value of the zone.</p> <p><i>A key development site at the intersection of Rundle Street, College Road and Little Grenfell Street as depicted on Concept Plan Fig MUH(C)/1 provides the opportunity for a mixture of commercial and medium density residential development. Development will be up to four (4) storeys, however, building elements above two storeys will be set back an additional two or more metres so as to be visually recessive and to maintain a lower-scale feel along Rundle Street and College Road. Taller building elements will be focused toward Rundle Street and transition down in height and scale to a maximum of three (3) storeys toward Little Grenfell Street and the adjacent Residential Zone. Development of this site should also be cognisant of the strong heritage and character nature of the locality and sensitively interface with the original form of heritage buildings located on or adjacent the site. Large frontages should be strongly articulated to reflect the historic fine-grained building pattern of the area. Vehicle access should be provided via a common driveways to the rear of dwellings.</i></p>	<p><i>78-80 Rundle Street, Kent Town</i></p> <p><i>The building setback beyond the two-storey podium scale envisaged for new development on the site adjacent Rundle Street and College Road frontages, should be the same as that which is required for the High Street Policy Area of the adjacent Urban Corridor Zone, i.e.. 3 metres (PDC 4(b)), not 2 metres as is proposed in the Desired Character Statement for this site. This would provide a better relationship of new built form with existing lower scale heritage listed buildings on adjacent sites.</i></p> <p><i>The inclusion of the statement in the Desired Character Statement that "vehicle access should be</i></p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
	<p><i>provided via a common driveway to the rear of dwellings" is not supported. Whilst this configuration would solve some potential issues such as garage dominance on Little Grenfell Street, it may not be the best solution for other potential development options for the site. For example, basement parking across the majority of the site would eliminate the need for at-grade parking and driveways and provide opportunities for more appropriate common space at ground level.</i></p> <p>General Comments</p> <p>1-5 Beulah Road, Norwood</p> <p>The site at 1-5 Beulah Road, Norwood was not included in the affordable housing overlay, presumably on the basis that the subject land is relatively small (1800m²) and unlikely to generate a substantial dwelling yield, having regard to the proposed four storey height limit and factoring in setback requirements and other design constraints, such as the provision of lifts and services and the likelihood that the ground and first floor levels will be primarily developed for commercial purposes.</p> <p>That said, the rationale for excluding 1-5 Beulah Road, Norwood from the affordable housing overlay map is questioned given the realistic possibility that a development proposal including more than twenty dwellings could be submitted and approved for this site.</p> <p>The proposed four (4) storey maximum building height takes into account the location of the site investigation areas within the Mixed Use Historic (Conservation) Zone, significant heritage places in the locality and the scale of the sites to allow increased building heights and residential densities while managing the interface with adjacent development. Whilst this</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p>Public Notification</p> <p>22 The categorisation of development shall be determined by reference to Schedule 9 of the Development Regulations 2008 and Section 38 of the Development Act 1993, except where specifically designated below.</p> <p>Category 1 Development</p> <p>The following development is assigned to Category 1 pursuant to Section 38 of the Development Act 1993, and accordingly will be subject to the public notification requirements applying to Category 1 development:</p> <p>All forms of development (except where the development is classified as non-complying) in the:</p> <p>(a) Payneham Road Policy Area, other than where the site of the development is adjacent to land in a zone under the relevant Development Plan which is different to the</p>	<p>aspect of the draft DPA is supported, the absence of a Desired Character Statement for 1-5 Beulah Road, Norwood is questioned and appears to be a critical drafting oversight.</p> <p>Without a Desired Character Statement for the site, the existing provisions in the <i>Mixed Use Historic (Conservation) Zone - The Parade / Fullarton Road Policy Area</i> provide insufficient guidance against which to assess new developments for this site and there is no maximum building height reference contained in the existing Policy Area provisions, aside from a reference in the updated Strategic Growth Concept Plan map for the Policy Area.</p> <p>It is therefore recommended that a Desired Character Statement be drafted in respect to 1-5 Beulah Road, Norwood, which includes an emphasis on a maximum building height of four (4) storeys and the management of interface issues with adjacent development, particularly residential development to the east. The Desired Character Statement should also make reference about preferred vehicular access arrangements, given the location of the site on a very busy intersection, heavily trafficked by vehicles, cyclists and pedestrians.</p> <p>Adjustments to public notification requirements to allow buildings up to three (3) storeys as Category 1 development, with buildings exceeding three (3) storeys to be classed as Category 2 development (notification to adjoining properties) is supported.</p>

Inner and Middle Metropolitan Corridor (Sites) DPA <i>(Text in red denotes new or amended policy)</i> <i>(Text in black denotes existing wording in Development Plan)</i> <i>(Text in blue denotes recommended edits to proposed policy)</i>	NPSP Council Comments
<p> (b) zone that applies to the site of the development; or The Parade/Fullarton Road Policy Area, where located in 'Key Development Areas' on Concept Plan <u>Fig MUH(C)/1</u> and the development is up to three stories (11.5 metres) in height. </p> <p>Demolition of a building or structure, which is not:</p> <p>(a) listed in <u>Table NPSP/5, 6 or 7</u>;</p> <p>(b) a building constructed prior to 1920 in The Parade/Fullarton Road Policy Area; or</p> <p>(c) a building constructed prior to 1940 in the Dequetteville Terrace Policy Area.</p> <p>Category 2 Development</p> <p>The following development is assigned to Category 2 pursuant to Section 38 of the Development Act 1993, and accordingly will be subject to the public notification requirements applying to Category 2 development:</p> <p>All forms of development (except where the development is classified as non-complying) in the:</p> <p>(a) Payneham Road Policy Area not listed as Category 1; or</p> <p>(b) The Parade/Fullarton Road Policy Area where located in key development areas on Concept Plan <u>Fig MUH(C)/1</u> and more than 3 storeys (11.5 metres) in height</p> <p>Demolition of a building or structure listed in <u>Table NPSP 6 or 7</u>.</p> <p>Demolition of a building constructed prior to:</p> <p>(a) 1920 in The Parade/Fullarton Road Policy Area; or</p> <p>(b) 1940 in the Dequetteville Terrace Policy Area.</p>	