



City of
**Norwood
Payneham
& St Peters**

**CHIEF
EXECUTIVE'S
OFFICE**

12 November 2020

Mr Michael Lennon
Chair, State Planning Commission
Payneham and Stepney Strategic Sites DPA
By email: saplanningcommission@sa.gov.au

Dear Mr Lennon

**DRAFT PAYNEHAM AND STEPNEY STRATEGIC SITES DEVELOPMENT PLAN
AMENDMENT**

I refer to the draft *Payneham and Stepney Strategic Sites Development Plan Amendment (DPA)* which has been placed on public consultation.

The Council appreciates the opportunity to provide comments on this important Development Plan Amendment, which proposes to re-zone two light industry properties in Payneham and Stepney to the Urban Corridor Zone.

The Council is supportive of the overall intent of this draft DPA, given that these properties were historically 'spot zoned' to accommodate land uses which are, or will soon be, no longer in operation. The proposal to re-zone these properties to a more versatile mixed use zone is also considered appropriate, however the potential scale of future development and the broader strategic context of these rezoning proposals, have highlighted a number of issues which are set out in this submission.

Urban Corridor Building Height Policies

Maximum building height is a primary factor in determining the development potential of a property and is of key interest to the Council, the community, as well as the development sector. It is therefore important that policies relating to building height are clear in their intention and application and are appropriately scaled to the locality, taking into account local considerations and context.

There are three key policies in the draft DPA, which determine the potential maximum building height on the subject sites, namely;

- Urban Corridor Zone PDC 13 - maximum building height in storeys and metres;
- Business Policy Area PDC 9 and Transit Living Policy Area PDC 10 - significant development sites; and
- Urban Corridor Zone PDC 14 - building envelope policy

The interrelated nature of these policies creates some ambiguity in potential development outcomes, as discussed in detail in this submission. Council staff have held discussions with Planning and Land Use Services staff, to seek a better understanding of how these policies are intended to be applied to the future development of the properties.

Further clarification should be provided, particularly given that communities and other stakeholders, are being asked to comment at the planning policy stage, with reduced public notification at the Development Application stage. It is noted that the draft DPA lists development which fits within the building envelope (demonstrated to be possible at 7 storeys for the Payneham property and 4 storeys for the Otto's property) as Category 1 development, with no public notification undertaken.

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Significant Development Sites Policies

Although the Urban Corridor Zone Principle of Development Control 13, clearly articulates a maximum building height for each Policy Area, the proposed Significant Development Sites policies could allow an additional 30% building height, resulting in potential maximum building heights as set out in Table 1 below.

In the absence of any other legislative definition, use of the word “maximum” has the dictionary definition as “*as great, high, or intense as possible or permitted*”. This concept appears to be contradicted and overridden by other PDCs which permit additional height to be added to the “maximum”. In turn, this provides uncertainty for all parties – the property owner, the developer and the community.

TABLE 1: POSSIBLE BUILDING HEIGHT OUTCOMES

	Height maximum – Zone PDC 13	Additional 30% - Business Policy Area PDC 9 Transit Living Policy Area PDC 10	With Bonus Height Limit Applied (rounded up) and still able to meet 30°building envelope PDC 14
Payneham	5 storeys (18.5 m)	Extra 1.5 storeys (or extra 5.6m)	7 storeys (or 24.1m)
Stepney	3 storeys (11.5m)	Extra 0.9 storeys (or extra 3.5m)	4 storeys (or 15m)

To better understand the potential implications of this policy, Council staff have prepared indicative diagrams indicating how the bonus height could potentially be accommodated on the property, in conjunction with the building envelope policy, which are contained in **Attachment A**.

As you will recall, the City of Norwood Payneham & St Peters, as well as other councils, rejected the inclusion of the significant Development Sites policy when it was originally proposed in the 2013 Urban Corridor DPAs. Instead of Significant Development Sites, the Norwood Payneham & St Peters Development Plan identifies additional building heights only for specific sites through concept plans. This policy approach, clearly depicted in the Development Plan, is considered to provide more certainty and transparency for all parties and be a more transparent method for allowing additional building height on appropriate sites.

In 2013, the Significant Development Sites policy was written to apply across the Urban Corridor Zone to incentivise the assembly of land into amalgamated sites as these land parcels became available (i.e. not limiting the bonus heights to pre-identified key development areas). However, in this draft DPA the Significant Development Sites policy *only* applies to the affected Stepney and Payneham properties, not other properties which are currently zoned Urban Corridor. Both of these properties which are being rezoned already meet the minimum site area requirement of 2500m², and some of the specified design criteria in the Significant Development Sites policy are considered to reflect the “normal” level of policy requirements outlined in other policies (i.e. in providing 15% affordable housing, the developer would be allowed to build a taller building). Achieving the 30% additional bonus site is therefore, somewhat of a *fait accompli* for the Stepney and Payneham properties and the Council does not agree with or support this outcome.

The supporting commentary contained in the draft DPA, indicates that the maximum building heights of 3 and 5 storeys were determined appropriate in the context of the respective localities. The Significant Development Sites policy will likely lead to building heights greater than the “maximum”, but there is insufficient justification as to why the ‘bonus’ heights of 4 and 7 storeys would be appropriate in the respective streetscapes and contextual settings. While policy incentives play a valuable role in encouraging “over and above” development expectations, or provide flexibility for properties in extenuating circumstances, there does not appear to be any justification or explanation for the proposed properties and the likely impacts on surrounding residential interfaces. In short, the case has not been made to allow building height bonus policies for either of the properties and this policy approach lacks transparency.

It is noted that one benefit of the Significant Development Sites policies would be to encourage the retention of the subject properties as one cohesive development site, rather than the properties being divided or sold off in portions to various developers. However, other policy mechanisms, such as a concept plan, would provide a more transparent policy direction for the development of the properties as a co-ordinated outcome in the event the parcels of land are sold separately.

It is also noted that the draft Phase Three *Planning and Design Code*, includes Significant Development Sites policy, which is not supported by the City of Norwood Payneham & St Peters. Further discussion regarding the transition to the Code is provided below.

Should the Significant Development Sites policy be retained, it is recommended that the Urban Corridor Zone PDC 13, should include a reference to this policy as to what height ultimately prevails. In the current Urban Corridor Zone policy, PDC 13 currently indicates other factors which may affect the maximum building height as shown below:

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, UrC/2 and UrC/3, building heights (excluding any rooftop mechanical plant or equipment) should be consistent with the following parameters:

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	No minimum	3 storeys and up to 11.5 metres

Additionally, the Significant Development Sites policy should make reference to the building envelope policy, to clarify that the building envelope policy prevails. That is, the '30% *bonus height*' does not allow parts of a building higher or closer to an interface boundary than what is prescribed by the 30 degree plane.

The wording of Business Policy Area PDC 9 and Transit Living Policy Area PDC 10, should also be reconsidered to clarify whether an 'or' or 'and' should separate parts (a) and (b).

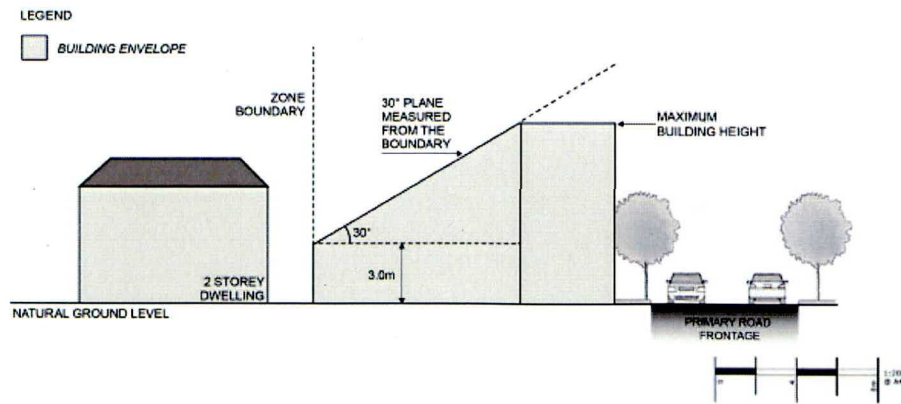
It is therefore recommended that the Significant Development Sites policy be removed from the draft DPA. In the event this policy is not removed, greater context and disclosure regarding the extent of policies that will apply to both sites should be provided, particularly by clarifying which height policies takes precedence over another, and also clarify the wording in relation to whether (a) and (b) should be separated by an 'and' or an 'or'.

Building Envelope Policy

The Council supports the retention of the building envelope policy at a 30 degree angle (Urban Corridor Zone PDC 14) without amendment through this draft DPA. However, a review of how this policy would apply to the subject properties, has identified some ambiguity as to how the policy will be interpreted. In particular, to a property (such as the Payneham property) which has four potential street-facing frontages, three of which are also the boundary to an adjoining Residential Zone. The policy in the draft DPA should be revised to clarify whether the reference to the primary frontage, as highlighted below, relates to the primary frontage of the parent site:

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:

Figure 1



The majority of existing Urban Corridor Zone properties in Kent Town are linear with relatively obvious primary frontages. The two existing Urban Corridor sites outside of Kent Town are supported by site-specific specific policy guidance in the Desired Character Statements. The Payneham property has three (3) side streets adjacent to the residential zone where the building envelope policy would presumably apply. However, if 'primary frontage' was interpreted as being the primary frontage of any dwelling or tenancy facing one of those side streets (e.g. townhouses facing Lewis Road) then the building envelope would arguably not apply and 30% height bonus may apply, resulting in unreasonable building height impacts on surrounding residential properties. The largest portion of the Stepney property also has frontages to both Ann Street and Wells Street, creating the same ambiguity. It is recommended that the wording of PDC 14 be amended to avoid this ambiguity and successfully manage any interface with a residential zone.

Where a development exceeds the building envelope policy, the development would be a Category 2 development for public notification. Notwithstanding the changes to the public notification framework in the new planning system, it is recommended that development exceeding the building envelope is Category 3 rather than Category 2.

It is recommended that Urban Corridor Zone PDC 14 be amended as follows:

*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 **of the parent development site**).*

Alternatively, the policy should be amended to specifically refer to the roads which do not require the building envelope interface or otherwise indicating the type of road which is exempt (e.g. State Maintained Roads) and PDC 21 amended such that development which exceeds the building envelope policy is Category 3 public notification rather than Category 2.

Transition to the Planning and Design Code

The timing of the draft DPA in conjunction with the broader planning reforms, creates uncertainties and concerns due to the loss of policy and change in planning outcomes. The planning reform program represents a significant change to the planning system. While the Council accepts the need for some level of 'business-as-usual' during this transition period, there are significant challenges in releasing the draft DPA at this late stage of the reform program both in terms of policy transition and the impact on the community's ability to engage with either proposal. The consultation of the draft DPA overlapping with re-consultation of the *Planning and Design Code* (the Code) presents a unique situation where two concurrent but conflicting zone proposals apply to the subject properties, under two different legislative frameworks. It would be very difficult for a community member to meaningfully understand the implications of these concurrent processes.

Lost Policy

While there may still be an intent for the draft DPA to progress under the *Development Act 1993*, it is expected that the draft DPA will not be implemented in the Development Plan as drafted and instead, it is likely that it will transition directly to the Code. As a result, it is the Council's view some of the draft

DPA policy content which is not compatible with the Code format and content, will presumably be omitted or modified. For example:

- proposed DPA amendments to the Desired Character Statements of both the Urban Corridor Zone and Business Policy Area get removed (along with the loss of Desired Character Statements as a whole and the unique and locally specific policy guidance they provide);
- land use exemptions or particular requirements for the Payneham property in the Business Policy Area policies (e.g. PDC 1, 2 & 3) most notably that shop floor area can be 2000m² at this site but 500m² in other locations;
- exemptions from non-complying list for the Payneham property (PDC 20); and
- public notification requirements specific to the Payneham property (PDC 21).

The Council considers it disingenuous to consult on policy content which is unlikely to apply in practice and in this respect, the Council requires clarification as to how these proposed policy outcomes will be transitioned to, or reflected in the Code. To progress this, the Council would like to be involved in further discussions with the Department about how the DPA policy details can be preserved in the transition to the Code.

Building Height Policy

As referred to above, the Significant Development Sites policy proposed in the Code, is not supported by the City of Norwood Payneham & St Peters, for the reasons outlined in this submission and in the submission which the Council made during the Phase Three Planning and Design Code consultation.

As you are aware, the draft Code also proposes to amend the Affordable Housing Overlay, such that providing the required 15% affordable housing would now allow dwelling sites to be reduced by 20% and building heights could be increased by 30% in the Urban Corridor Zones. Department staff have indicated that the additional building height permitted in the affordable housing overlay, is not *in addition* to building height bonuses permitted through the Significant Development Sites policy, however the concern remains with the proposed introduction for 'bonus height' for achieving the affordable housing outcome which has been an existing policy requirement for quite some time.

Floor area of shops in Business Policy Area / Urban Corridor (Business) Zone

The anticipated floor area of shops differs between the Business Policy Area (as contained in the draft DPA) and the Code's Urban Corridor (Business) Zone as outlined below:

Anticipated Shop Floor Area	
Current Development Plan - Business Policy Area	<i>PDC 3</i> Shop or group of shops should have a maximum gross leasable floor area in the order of 500 square metres
Draft DPA - Business Policy Area	<i>PDC 3</i> In Kent Town, a shop or group of shops should have a maximum gross leasable floor area in the order of 500 square metres and in Payneham, a shop should have a maximum gross leasable floor area of 2000 square metres .
Code - Urban Corridor (Business) Zone	<i>DTS/DPF 1.2</i> Shop, office or consulting room uses not exceeding a maximum gross leasable floor area of 1000m² in a single building.

Notwithstanding the increase in floor area from 500m² (Development Plan) to 1000m² (Code), it is unclear how the 2000m² exemption for the Payneham property will transition to the Code.

As such, it is recommended that clarification be provided as to how various parts of the draft DPA policy content will be preserved in the Code, as discussed in this section.

Payneham Site

The following comments relate specifically to the Payneham property.

Land Use

The background analysis contained in the draft DPA indicates that the property is able to accommodate 10,000m² of total retail floor area, with commentary regarding the proponent's estimate of 4435m² of retail/ commercial floor area. The policy for the proposed Urban Corridor Zone – Business Policy Area allows for a shop or group of shops up to 2000m² of retail floor area, making it unclear what the retail expectations are for the property. The extent of retail (shopping) versus commercial floor space is unclear, but is relevant to policy considerations as the Business Policy Area is not a retail focused policy area under the suite of Urban Corridor policy areas.

Retail land use or shops are not expressly mentioned in the Policy Area objective, unlike the Boulevard Policy Area of the Urban Corridor Zone (applying along North Terrace Kent Town) which encourages shops, with policy to allow shops of up to 1000m². The existing Business Policy Area (applied along King William Street, Kent Town) currently allows shops of a small scale serving local businesses, with policy limiting this to 500m². Through the draft DPA, it is proposed for the Payneham Policy Area of this zone, to extend the maximum floor area of a shop or group of shops from 500m² to 2000m². If the intent of the policy is to have a significant increase in the size of shops and extension of the catchment beyond services to local businesses, it is questionable whether the Business Policy Area is the best fit for this mix and scale of land uses. It is also considered that further commentary is required regarding the likely impact of a development of this property on surrounding centres, particularly the district-level Marden Shopping Centre.

The Policy Area content does not provide any guidance in respect to light industrial land uses for the Payneham property, despite this being listed as a desired form of land use. Given that the investigations undertaken in preparing the draft DPA suggest phasing light industrial land use out of this location due to its incompatibility with surrounding residential development, the draft DPA requires greater policy detail, particularly due to the mixed use buildings that are contemplated for the Payneham site. This lack of policy guidance will be further compounded in the transition to the *Planning and Design Code*, when Desired Character Statements for all zones in Development Plans will be deleted. Further thought should be given to whether this Policy Area is the best fit for larger retail format and how this will be reflected in the Code.

As such, it is recommended that the policy contained in the draft DPA be amended to set out a suitable size retail element for the site that does not unduly impact on the catchment of the Marden Shopping Centre (with supporting evidence and commentary) and which provides clarity of policy expectations, both under the Development Plan and the imminent Planning and Design Code; and

In addition, policy guidance should be provided in relation to the envisaged light industrial uses on the site.

Building Height

The five (5) storeys height limit is discussed in the draft DPA, as being supported only by virtue of road separation (Ashbrook Avenue, Lewis Road and Thelma Street) and the fact that five (5) storeys is the equivalent existing Policy Area height for Kent Town. The suitability of this property for some form of higher scale development, needs to be balanced with its close proximity to primarily single and some two storey residential land uses surrounding the site. In short, the context of this property is different to the five (5) storey policy areas in Kent Town.

To this end, the fact that the Business Policy Area currently has a five (5) storey policy setting applied in Kent Town, is not considered to be adequate justification for the same height limit for an unrelated and isolated property in Payneham, which is significantly further from the CBD and Parklands. The relevance is illogical. The draft DPA is considered to present limited rationale/justification for five (5) storey development and a lesser height limit of four (4) storeys would be more suitable (inclusive of any height bonuses if ultimately retained in the policy) to achieve a better balance of building mass and impacts on adjacent low rise residential buildings and local traffic movement.

As such, it is recommended that the maximum building height for the Payneham property is limited to four (4) storeys, *inclusive* of any potential height bonuses permissible under other policies.

Traffic and Movement

The investigations in respect to traffic which have been undertaken, conclude that access points, service vehicles and traffic movements, can be safely and efficiently accommodated without change to the nature and function of the adjacent road hierarchy. Notwithstanding this, it is considered necessary for greater policy detail to be included to manage potential issues related to increased traffic impacts, particularly in the local street network. In particular, the policy should require a separation of vehicular access for future commercial and residential development components and prevention of vehicular access to commercial land uses from residential streets. In addition to specific policies addressing these issues, a Concept Plan would be beneficial to spatially denote the expectations for co-ordinated access points, separation of domestic and commercial vehicles, as well as expected urban design outcomes particularly at the interface with residential zones.

As such, it is recommended that policy regarding the management of traffic impacts be included in the draft DPA, particularly in respect to the separation of vehicular access for commercial and residential land uses and prevention of vehicular access associated with commercial land uses from the residential streets.

Building Siting at the Residential Interface

It is noted that the building envelope policy is intended to mitigate impacts at the interface with residential zones, however this policy was drafted with the intention of largely being applied along arterial 'corridors', which are generally only one allotment deep. Applying the policy to a large, deep properties such as the Payneham site, to mitigate impacts on residential properties to the 'rear' requires some consideration as to how future development might be configured and whether the buildings would 'front on' to only Payneham Road or have frontage to Lewis Road, Thelma Street or Ashbrook Avenue. As outlined above, it is recommended that additional policy guidance be provided as to how the building envelope policy applies to the subject sites.

The draft DPA prescribes a setback from Lewis Road, Thelma Street and Ashbrook Avenue of either 3 metres or 2 metres (depending on whether the development is configured with front, side or rear frontages to these streets). From a built form and urban design perspective, this is considered insufficient to mitigate the impacts of significant scale on the site and its integration with primarily single storey dwellings in the surrounding residential zone, particularly on Lewis Road and Thelma Street. It is recommended that these setbacks should be increased to between 6 and 8 metres to provide opportunities to ameliorate the scale of new development, including suitable landscaping and provide high quality liveability standards. Setbacks on the Ashbrook Avenue frontage should be guided by the existing buildings on the separately owned allotments which are also subject to the rezoning, particularly the two-storey residential building on the corner of Lewis Road and Thelma Street.

It is recommended that the setbacks to Lewis Road and Thelma Street be increased to between 6 and 8 metres, with policy supporting landscaping and similar buffers to the residential interface; and

In addition, the Ashbrook Avenue setback should be reconsidered to provide a relationship with the adjacent properties. (Also include a concept plan indicating appropriate building siting as outlined below).

Council Infrastructure

From an infrastructure perspective, following the Council's upgrade to stormwater infrastructure across the property, an easement above the main culvert has been realigned and a further easement is being implemented perpendicular to Lewis Road. The constraints of these easements, as well as other site co-ordination issues (access, building envelopes, carparking areas, landscaping etc), should be clearly designated in a Concept Plan, so that any future owner or developer is aware of these site constraints.

As such, to address this issue, a concept plan for the Payneham property should be included in the draft DPA, including policy direction relating to:

- anticipated and appropriate traffic and other movement in and around the site, particularly directing vehicular access associated with commercial land uses away from the residential streets; and
- appropriate building siting and transition to residential areas; and

- constraints on the site relating to existing and future easements / stormwater infrastructure; and
- appropriate landscaping and other buffers at the interface with residential areas.

Stepney Site

The following comments relate specifically to the Stepney property.

Building Height

The proposed maximum building height of three (3) storeys is supported. However, as outlined above, bonus height policy potentially allowing up to four (4) storeys is not supported by the Council.

Depending on how the building envelope policy is interpreted and applied, building heights of up to 3 or potentially 4 storeys, could be seen as incentivising greater heights immediately adjacent the adjacent Local Heritage Places on Magill Road. It is noted that “heritage adjacency” policies in the current City Wide policies or proposed Heritage Adjacency Overlay contained in the Code, would be relevant in the assessment of developments proposed for the property. However, it is considered appropriate and necessary for more specific policy guidance to be provided to this site, given the site-specific intensification which is proposed and the multiple constraints surrounding the site (heritage buildings, historic conservation areas, laneways, restricted access and circulation).

As such, it is recommended that additional policies be included in the draft DPA to sensitively manage potential impacts on the adjacent Local Heritage Places particularly in relation to incentivising height increases furthest from the residential interfaces (in addition to a concept plan as recommended below)

Traffic and Movement

The investigations which have been conducted as part of the draft DPA, conclude that the Stepney rezoning, to accommodate residential and mixed use development, is considered appropriate from a traffic management perspective and will not require additional policy coverage on this issue and access arrangements and car parking can be considered in detail at the development application stage when there is a known design outcome for the sites.

However, due to the narrow street network, narrow public and private laneways and rear access constraints and high levels of on-street car parking demand, this should be explicitly addressed in the policy requirements for this property. Rather than deferring this matter until such time as a Development Application is lodged, appropriate policy should be included in the draft DPA to include Principles of Development Control and where necessary, diagrammatic representation through a Concept Plan to ensure any redevelopment will have co-ordinated access, car parking and circulation movements that do not unduly impact on local conditions.

As such, it is recommended that a concept plan for the Stepney property be developed and included in the DPA, including policy direction relating to:

- interface and sensitive transition to the Local Heritage Places on Magill Road;
- anticipated and appropriate traffic and other movement in and around the site, particularly in relation to the narrow street network and public and private laneways of varying quality;
- appropriate building siting and transition to residential areas; and
- appropriate landscaping and other buffers at the interface with residential areas.

4 Bennett Street Maylands

The inclusion of the two allotments known as 4 Bennett Street Maylands, which contain a dwelling and a ‘cottage industry’ (glass blowing), requires re-consideration. These properties form part of an intact ‘small scale’ residential character along the southern end of Bennett Street so should be included into the adjacent Residential Character Zone as these sites are not considered to have merit for ‘uplift’ opportunities given their context.

It is therefore recommended that 4 Bennett Street Maylands be rezoned into the adjacent Residential Character Zone, rather than the Urban Corridor Zone as proposed in the draft DPA.

Policy Wording

Transit Living Policy Area PDC 12 (which sits under the heading of Significant Development Sites) states:

Development that:

- (a) is constructed within zone's Interface Building Height provisions*
- (b) locates non-residential activities and higher density elements towards the primary road corridor; and*
- (c) locates taller building elements towards the primary road corridor.*

The wording of this policy appears to have been structured in the manner of a Code policy (as a statement rather than an instruction). In any case, the policy intent is unclear as to whether part (a) is reiterating Urban Corridor Zone PDC 14, which relates to the building envelope, or whether the intent is to reiterate that Significant Development Sites still need to comply with the building envelope, notwithstanding the additional 30% extra building height. Alternatively, perhaps the policy is intended to be written as follows:

Development that is constructed within zone's Interface Building Height provisions:

- (a) locates non-residential activities and higher density elements towards the primary road corridor; and*
- (b) locates taller building elements towards the primary road corridor.*

Clarification on how this policy should be interpreted is required, with inclusions also to reflect the conflicting objective of need for separation and sensitive treatment of taller building elements adjacent Local Heritage Places.

Transit Living Policy Area PDC 13 which relates to vehicle access is located under the heading of Strategic Developments Sites, however this policy is relevant to all sites, not just a strategic site. It is recommended that this is removed from under the Strategic Development Sites heading, to demonstrate its broader applicability to all sites.

Re-zoning isolated sites

As outlined above, the Council is generally supportive of the intent of this draft DPA, due to the cessation of existing business activities on each of these properties, and that alternative land uses are likely to provide a better 'fit' in the surrounding residential areas. However, while the Otto's property at Stepney forms a logical extension of inner corridors and vibrant mixed use commercial/ housing precincts, the former Schweppes property on Payneham Road for bulky goods, supermarket and 5 storey (or 7 storey) residential towers, is questionable in terms of the strategic impetus.

Beyond the *30 Year Plan for Greater Adelaide*, which provides for 85% of new infill in established urban Adelaide by 2045, there is a lack of detailed strategic and spatial guidance for which areas across inner metropolitan areas will be supported and prioritised for rezoning to deliver mixed use, multi storey developments. While a regional plan cannot determine which properties will become commercially available, a regional plan (or subregional plan) can provide much clearer direction for the density and scale of development that can be planned for the future, taking into account proximity to established centres, open space, available infrastructure, and broader land use planning principles.

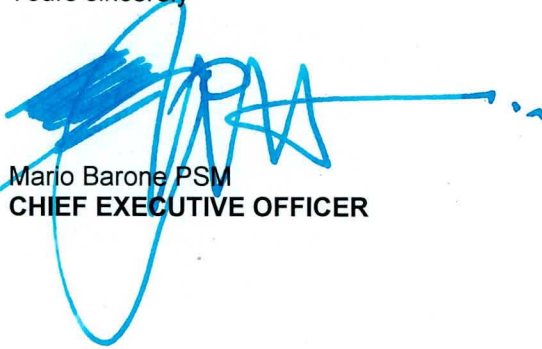
Managing the impacts of and providing coordinated services for, substantial developments on isolated properties presents a bigger challenge and less efficiency than managing these services on a precinct or nodal basis. Rezoning isolated sites also provides less certainty and clarity for the community, particularly where the proposed intensity is substantially at odds with the surrounding locality as is the case with the former Schweppes property. With the new planning system offering the ability for private proponents to initiate Code Amendments, it is expected requests for 'spot rezoning's' will increase, which is a concern, particularly without a more spatially resolved regional plan. This represents a fundamental flaw in the proposed system and leads to a number of issues which have been well documented in other jurisdictions across Australia and in the Councils previous submissions. It represents an unnecessary component of the new planning system and relies on developers to change urban form and land use rather than this function being the responsibility of a planning state agency.

As the commission appears to be resistant to changing this strategy, at the very least, a revised metropolitan Regional Plan and sub-regional plan to guide similar future 'spot zoning' requests should be a priority.

The Council wishes to be heard in support of its submission at the scheduled Public Meeting.

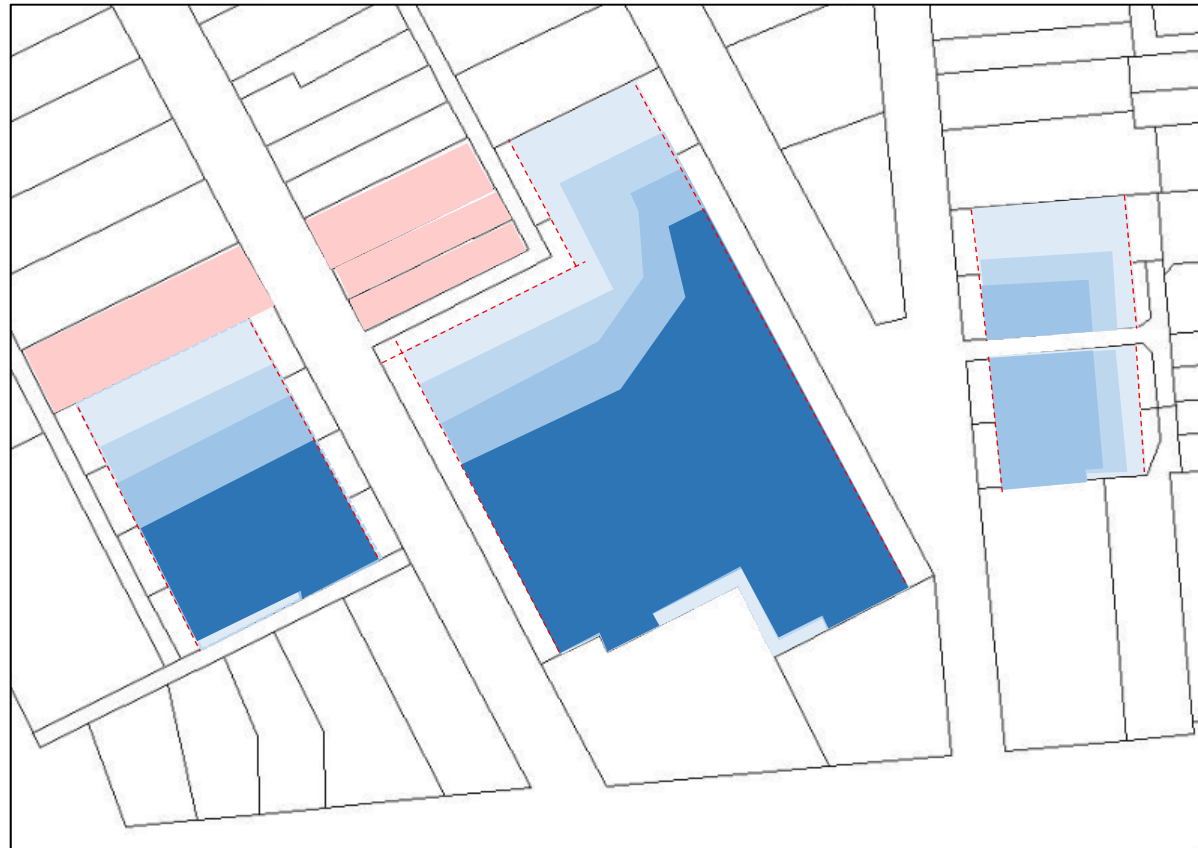
Again, thank you for the opportunity to provide comments on the draft DPA. Should you have any questions regarding the submission, please do not hesitate to contact me on 8366 4520 or the Council's Manager, Urban Planning & Sustainability, Eleanor Walters on 8366 4521.

Yours sincerely

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

Mario Barone PSM
CHIEF EXECUTIVE OFFICER

Building Interface Provision (Building Envelope Policy) Stepney Site

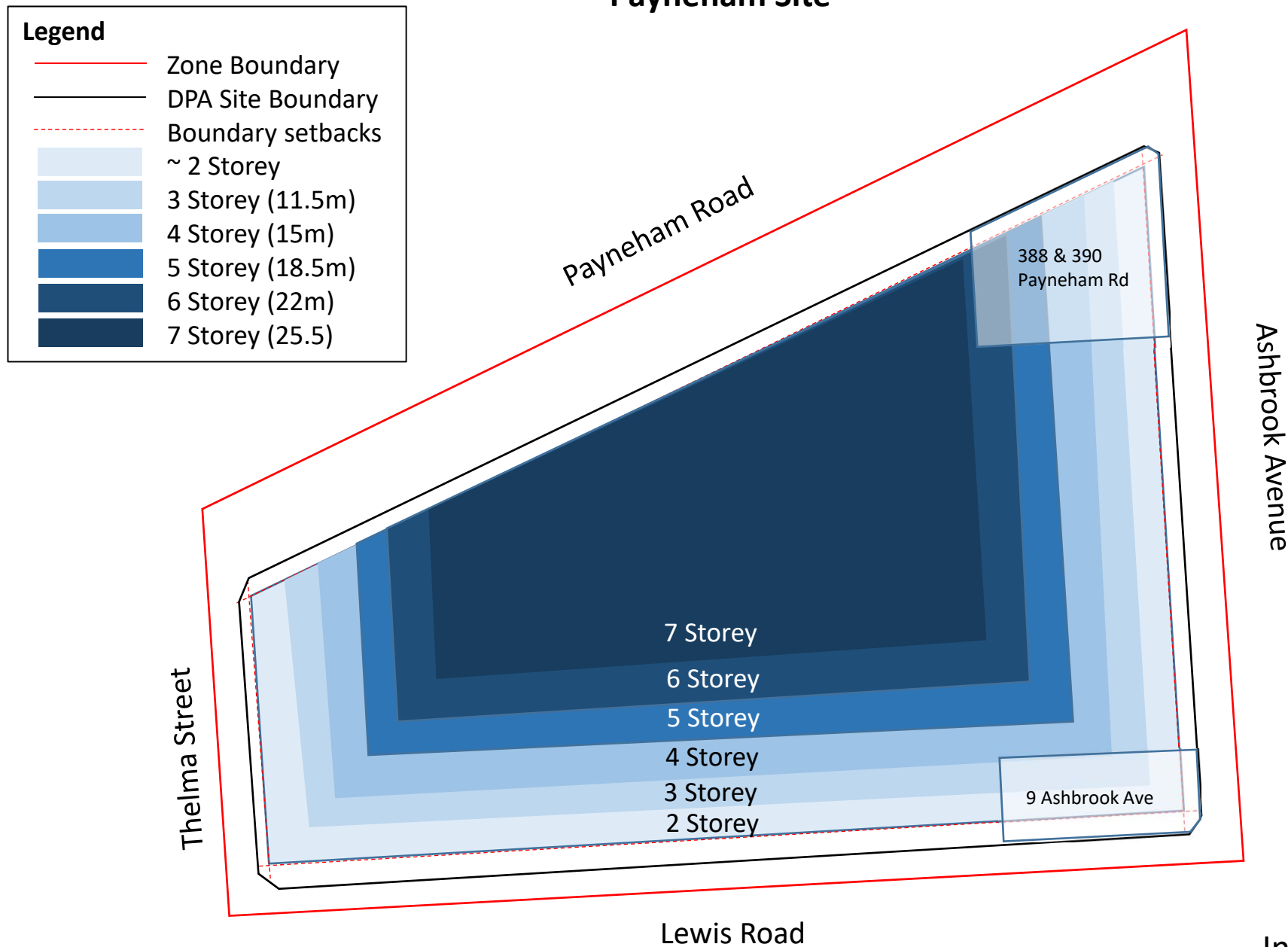


Legend

- Zone Boundary
- - - Boundary setbacks
- Proposed RH(C) Zone
- ~ 1 storey
- 2 Storey (8m)
- 3 Storey (11.5m)
- 4 Storey (15m)

Indicative Only

Building Interface Provision (Building Envelope Policy) Payneham Site



Indicative Only