

Development Plan Amendment

By the Council

Port Adelaide Enfield Council

Corner of Days & Regency Roads, Croydon Park

Explanatory Statement and Analysis

For Consultation

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Have Your Say

This Development Plan Amendment (DPA) will be available for inspection by the public at the Port Adelaide Enfield Civic Centre, 163 St Vincent Street, Port Adelaide, and Council libraries at:

- Enfield Library - Council Office, 1 Kensington Cr, Enfield
- Greenacres Library - Council Office, 2 Fosters Rd, Greenacres
- Parks Library, 46 Trafford Street, Angle Park
- Port Adelaide Library, 2-4 Church Street, Port Adelaide
- Semaphore Library, 14 Semaphore Road, Semaphore

The DPA is also available on the council website www.cityofpae.sa.gov.au/have-your-say from 14 January 2021 until 12 March 2021.

During this time anyone may make a written submission about any of the changes the DPA is proposing.

Submissions should be sent to Chief Executive Officer, PO Box 110, Port Adelaide SA 5015 or consultation@cityofpae.sa.gov.au

Submissions should indicate whether the author wishes to speak at a public meeting about the DPA. If no-one requests to be heard, no public meeting will be held.

If requested, a meeting will be held on 23 March 2021 at the Parks Library, Trafford St, Angle Park. Please note that this meeting will be held in accordance with social distancing and density requirements applicable at the time as prescribed by the Government of South Australia.

Explanatory Statement

Introduction

The *Development Act 1993* provides the legislative framework for undertaking amendments to a Development Plan. The *Development Act 1993* allows either the relevant council or, under prescribed circumstances, the Minister responsible for the administration of the *Development Act 1993* (the Minister), to amend a Development Plan.

Before amending a Development Plan, a council must first reach agreement with the Minister regarding the range of issues the amendment will address. This is called a Statement of Intent. Once the Statement of Intent is agreed to, a Development Plan Amendment (DPA) (this document) is written, which explains what policy changes are being proposed and why, and how the amendment process will be conducted.

A DPA may include:

- An Explanatory Statement (this section)
- Analysis, which may include:
 - Background information
 - Investigations
 - Recommended policy changes
 - Statement of statutory compliance
- References/Bibliography
- Certification by Council's Chief Executive Officer
- Appendices
- The Amendment.

Need for the Amendment

The allotments within the subject land are all within the Light Industry Zone.

A precast concrete manufacturer, building hardware supplier and two residential allotments are located in the southern portion of the land, while an auto repair shop, tyre shop (Bridgestone), hardware store and a number of derelict units currently occupy the northern portion of the land. Allotments 111 and 114 have been vacant since 1993 and contain a derelict house, corrugated steel shed, an above-ground diesel fuel tank and four large stockpiles of fill material (that have been assessed as part of the environmental investigations undertaken to date). The allotments are now contracted to the Salandra Group which is proposing to redevelop it for residential and/or mixed-use purposes.

The existing Light Industry Zone does not facilitate any land uses that would otherwise be appropriate in this urban infill circumstance.

To achieve a residential and/or mixed-use outcome will require rezoning the land from its current Light Industry Zone to a suitable zone such as a Suburban Neighbourhood Zone.

Proponent Funded DPA

A privately funded DPA is subject to an agreement with Council under its Project Management and Procurement Policy, where the private funder engages suitably qualified consultants to prepare the DPA, and the consultant(s) meet the requirements of the *Development Act 1993* and *Development Regulations 2008* to prepare the relevant DPA documents. Although the DPA process is funded substantially by the proponent, the Council has sought and relied upon independent advice from the Council's own consultant.

Council and the Minister for Planning retain full control over the DPA process and decision-making responsibilities in accordance with the *Development Act*.

Statement of Intent

The Statement of Intent relating to this DPA was agreed to by the Minister on 7th December 2016.

The investigation of the issues agreed to in the Statement of Intent has been undertaken and addressed.

Affected Area

The area affected is located in Croydon Park on the western side of Days Road, bound on its north side by Regency Road. It comprises 13 allotments as described in the table below, with a combined area of approximately 12 hectares.

Certificate of Title Registered Proprietor	Description	Area (ha)
90 Days Road, Croydon Park	Allotment 1 in DP 32496 CT: 5421/682	0.08
141 Regency Rd, Croydon Park	Allotment 1 in FP 121261 CT: 6128/46	0.15
Adelaide Property Leasing PTY LTD & Mare Property Pty Ltd 88 Days Road, Croydon Park	Allotment 2 in DP 32496 CT: 6421/933	0.08
Adelaide Property Leasing PTY LTD & Mare Property Pty Ltd 86-88 Days Road, Croydon Park	Allotment 3 in DP 32496 CT: 5421/993	0.08
92 Days Road, Croydon Park	Allotment 9 in FP112721 CT: 5204/642	0.09
SA Precast Equipment Holdings Pty Ltd 72 Days Road, Croydon Park	Allotment 29 in FP 117914 CT: 5402/300	0.98
68 Days Road, Croydon Park	Allotment 32 in FP 117914 CT: 5390/495	0.07
70 Days Road, Croydon Park	Allotment 33 in FP 117915 CT: 5795/482	0.08
Adelaide Property Leasing Pty Ltd 121 Regency Road, Croydon Park	Allotment 102 in DP 22109 CT: 5451/741	4.71
De Luca Pty Ltd	Allotment 111 in DP 35388	2.86

Certificate of Title Registered Proprietor	Description	Area (ha)
80-83 Days Road, Croydon Park	CT: 6100/771	
Landra Commercial Pty Ltd & De Luca Pty Ltd 76-78 Days Road, Croydon Park	Allotment 114 in DP 65185 CT: 6100/771	0.19
200 Days Rd Pty Ltd 74B Days Road, Croydon Park	Allotment 200 in DP 65185 CT: 5951/426	0.6
Chelonia Pty Ltd 75A Days Road, Croydon Park	Allotment 202 in DP 65185 CT: 6129/140	2.05

The land parcels comprise the full extent of the Light Industry Zone in this locality as shown on Zone Map PAdE/35 and identified in **Figure 1** on the following page.

Figure 1: Area Affected



Summary of Proposed Policy Changes

The DPA proposes the following changes:

- Change the Light Industry Zone in the Area Affected to the Suburban Neighbourhood Zone, in which predominantly low and medium density residential development comprising a range of dwelling types is envisaged along with activity centres that are located within a walkable distance of most residents
- Amend the Suburban Neighbourhood Zone by introducing text relevant to Croydon Park (the Area Affected) in the Desired Character statement and under subheadings Housing; Activity Centres and Non-residential uses; Access; Open Space; and Site Contamination.
- Identify Croydon Park as an area in which a Neighbourhood Activity Centre is envisaged in the zone. A neighbourhood activity centre in the context of the Suburban Neighbourhood Zone is a concentration of local business and services, civic uses that meet the needs of the local community, retail and weekly convenience shopping, retail showrooms, residential, hotel and restaurants, and may include education and community uses. The 30-Year Plan identifies activity centres as instrumental in the inclusion of residential development adjacent transit corridors, such as Regency Road.
- Amend the Zone Reference Table and Development Plan Maps to reflect the change in zoning from Light Industry Zone to Suburban Neighbourhood Zone (affects the Council Index Map, Location Map PAdeE/35, Overlay Map PAdeE/35 - Affordable Housing, Overlay Map PAde/35 – Noise and Air Emissions and Zone Map PAdeE/35).

Legal Requirements

Prior to the preparation of this DPA, council received advice from a person or persons holding prescribed qualifications pursuant to section 25(4) of the *Development Act 1993*.

The DPA has assessed the extent to which the proposed amendment:

- accords with the Planning Strategy
- accords with the Statement of Intent
- accords with other parts of council's Development Plan
- complements the policies in Development Plans for adjoining areas
- accords with relevant infrastructure planning
- satisfies the requirements prescribed by the *Development Regulations 2008*.

Consultation

This DPA is now released for formal agency and public consultation. The following government agencies and organisations are to be formally consulted:

- Department of Infrastructure and Transport
- Department for Environment and Water
- Attorney General's Department
- Department of the Premier and Cabinet
- Department of Treasury and Finance
- Department of Human Services (former Department for Communities and Social Inclusion)
- Department for Health and Wellbeing (former Department for Health and Ageing)
- Department for Trade and Investment (former Department of State Development)
- SA Power Networks
- SA Water
- Environment Protection Authority
- Metropolitan Fire Service
- South Australia Police
- State Emergency Service
- APA Group

The following State Members of Parliament (varied from the SOI based on current MPs in the local Electoral District and selected adjoining Electoral Districts), interested parties and individuals will be consulted during the consultation stage of the DPA:

- Minister for Planning and Local Government – Hon. Vicki Chapman MP
- Member for Croydon - Peter Malinauskas MP
- Member for Port Adelaide – Dr Susan Close MP
- Member for Enfield – Andrea Michaels MP
- Member for Cheltenham – Joe Szakacs MP
- Shadow Minister for Transport and Infrastructure –Tom Koutsantonis MP
- Shadow Minister for Housing and Urban Development –Tony Piccolo MP

The following Local Government authorities that adjoin the PAE Council boundary will be consulted during the consultation stage of the DPA in accordance with the agreed Statement of Intent :

- City of Salisbury
- City of Charles Sturt
- City of Prospect
- City of Norwood, Payneham and St Peters
- Walkerville Council

- City of Tea Tree Gully
- City of Campbelltown

Consultation with the public will be undertaken in accordance with the requirements of the Act and Regulations.

This will include:

- A notice in the Government Gazette
- The Advertiser
- The scheduling of a Public Meeting at which any interest person may appear to make representations on the proposed amendment.
- Surrounding property owners in the locality will be directly notified of the DPA.

All written and verbal, agency and public submissions made during the consultation phase will be recorded, considered, summarised and responses provided. Subsequent changes to the DPA may occur as a result of this consultation process.

Transitioning to the Planning and Design Code

A new planning system is currently being introduced into South Australia. The Planning, Development and Infrastructure Act 2016 (PDI Act) is being introduced in stages and will replace the Development Act 1993. A cornerstone element of the new planning system is the State-wide Planning and Design Code (P&D Code) which consolidates the planning rules contained in South Australia's 72 Development Plans into one rulebook. In this regard, the Port Adelaide Enfield Council Development Plan will be superseded by the new Planning and Design Code. This transition is anticipated to occur in early 2021.

The draft Code policy underwent extensive public consultation with submissions for Phase Three (urban areas) being considered by the State Planning Commission. Amendments to the draft Code will be proposed by the Commission to the Minister for Planning and Local Government. The Minister will then review these recommendations prior to approving the implementation of Phase Three of the Code.

Given the current transition taking place between the two pieces of legislation, this DPA is being prepared and consulted on under the Development Act 1993 to amend Council's current Development Plan. It is however recognised that any changes which arise from the DPA process would not likely be realised until implementation of the P&D Code.

Existing zones in the current Development Plan will be transitioned to an equivalent type zone in the P&D Code which has a similar underlying intent (note: the Zone in the P&D Code may have a different name to the equivalent zone in the Development Plan). The *Suburban Neighbourhood Zone* as contained in the Council's Development Plan and proposed to be applied to the areas affected by this DPA, is a contemporary planning framework that supports a low-medium density residential development and complementary local and neighbourhood centre activities. Under the draft Code, it is proposed that the *Master Planned Neighbourhood Zone* will apply. This transition will support low-medium density residential development which is conveniently located with a range of accompanying employment generating activities which make the neighbourhood a healthy and convenient place to live.

Refer to the SA Planning Portal at <https://plan.sa.gov.au/> for more information.

The Final Stage

When the council has considered the comments received and made any appropriate changes, a report on this (the *Summary of consultations and proposed amendments* report) will be sent to the Minister.

The Minister will then either approve (with or without changes) or refuse the DPA.

Analysis

1. Background

The DPA seeks to identify the most appropriate zoning of the land as a consequence of the major land owner's desire for their land parcels to facilitate the highest and best use, namely residential infill with some opportunities for mixed use compatible with residential amenity.

Consideration of various strategic documents also supports a rezoning of the land to better achieve the strategic directions being sought by the State and local government. A Statement of Justification from the landowner seeking support to pursue a privately funded DPA to amend the zoning of this land from Light Industry Zone to Suburban Neighbourhood Zone or Mixed-Use Zone has been considered by Council.

Council resolved to support this Statement of Justification and initiated a Statement of Intent seeking the Minister for Planning's approval to proceed with the required DPA. The DPA considers the desired residential outcomes for the land and the extent to which the opportunities can be realised having regard to the effective and economic provision of infrastructure, stormwater management and availability of community services.

Investigations by appropriate consultants undertaken to inform this DPA are identified in the References/Bibliography section of this document.

2. The Strategic Context and Policy Directions

2.1 Consistency with South Australia's Strategic Directions

South Australia's former Strategic Plan outlined a medium to long-term vision for the whole of South Australia. The 30-Year Plan for Greater Adelaide was prepared on the basis of the former plan (see Section 2.2).

The State Government is in the process of reform of the Planning System which seeks to achieve better outcomes for South Australia's economy, environment and communities. The planning reforms will be underpinned by the new Planning Development and Infrastructure Act 2016 and a new Planning and Design Code will be implemented in 2020.

The DPA is not contrary to the reforms and will be consistent with the directions of the new planning system particularly where it seeks to minimise the number of different residential zones applying across the state.

2.2 Consistency with the Planning Strategy

The Planning Strategy represents State Government planning policy for development in South Australia. In particular, it seeks to guide and coordinate State Government activity in the construction and provision of services and infrastructure that influence the development of South Australia. It also indicates directions for future development to the community, the private sector and local government.

The 30-Year Plan for Greater Adelaide 2017 Update, a volume of the Planning Strategy is relevant to this DPA:

An assessment of the DPA against relevant components of the Planning Strategy is contained in **Appendix A**.

2.2.1 Council's Strategic Directions Report

Council's most recent Development Act (Section 30) Strategic Directions review was undertaken in March 2012.

The Council's 2012 Strategic Directions Report set a DPA program to prepare nine DPAs in the coming years, covering residential, heritage, centre, corridor and general matters as well as specific DPAs. Section 3.1.17 Regency Road (Croydon Park and Environs) identified the majority of the area affected (in the Light Industry Zone) as one potential site for redevelopment in that 'study area' but as a low-medium priority for a DPA. Figure 9 (site numbered 12) in that report identified the general site as one of several areas the subject of rezoning requests. It was summarised as one of 4 sites of "greatest strategic merit" (page 91) that "council may consider investigations for other uses, with residential being one option". The list of DPAs did not specifically identify the Regency Road (Croydon Park and Environs) as an area being sought to be rezoned.

More recent strategic reviews undertaken by the State Government in relation to planning reform, and the now impending introduction of the Planning and Design Code, has overtaken any imperative for an updated review under the current regulatory framework.

The DPA achieves other relevant aspects of the Planning Strategy as summarised in **Appendix A**.

2.2.2 Infrastructure Planning

Where relevant, a DPA must take into account relevant infrastructure planning (both physical and social infrastructure) as identified by Council (usually through the Strategic Directions Report), the Minister and/or other government agencies.

The following infrastructure planning is of relevance to this DPA:

Council Infrastructure Planning	Response/Comment
No specific infrastructure planning (social or physical) for the Area Affected was identified in Council's Strategic Directions Report at the time of preparing the Statement of Intent.	The private proponents of the DPA have undertaken area specific investigations associated with the proposed rezoning. The investigations determined that physical infrastructure requirements relevant to the redevelopment of the land for urban residents are limited to any associated services/utilities and road infrastructure costs and ordinarily these costs will be borne by the developers at the time of the actual development or as agreed prior to receipt of Development Plan Consent. These social and physical infrastructure matters are considered further in Section 3.0.
Government Agency Infrastructure Planning	Response/Comment
No specific infrastructure planning (social or physical) has been identified by the Minister or a relevant agency for the Area Affected.	Infrastructure investigations were undertaken (see Section 3) but did not reveal any specific infrastructure

Government Agency Infrastructure Planning	Response/Comment
	projects by State Government agencies within or in the immediate vicinity of the affected area.

2.2.3 Current Ministerial and Council DPAs

As of January 2021, there are no other Ministerial and Council DPAs that are currently being processed within Port Adelaide Enfield. The last Ministerial DPA (at Devon Park) was gazetted in April 2020, and the most recent Council DPA (at Regency Park) was gazetted in October 2020.

2.2.4 Existing Ministerial Policy

This DPA proposed changes to the following, existing Ministerial policy:

Existing Ministerial Policy	Proposed Change and Justification
The South Australian Planning Policy Library (SAPPL) provides the strategic link between the volumes of the SA Planning Strategy and the Development Plans.	SAPPL policy modules will be adopted where relevant to the DPA. Any local additions will be consistent with the extent and content of local additions to a particular module will be consistent with local additions consolidated in the current PAEC Development Plan.

3. Investigations

3.1 Investigations undertaken prior to the SOI

Investigations to inform the DPA were undertaken by Agon Environmental prior to the agreement on the Statement of Intent was reached with the Minister related to preliminary investigations associated with possible land contamination and subsurface water contamination from past, present and surrounding uses on specific allotments:

- Lots 111 and 114 DP 35388, Days Road, Croydon Park (February 2016)
- 72 Days Road, Croydon Park (April 2016)
- 76 Days Road, Croydon Park (April 2016).

Agon Environmental has now consolidated the earlier investigations with the more recent review of environmental conditions for the Area Affected as summarised in Section 3.3 below.

3.2 Investigations undertaken to inform this DPA

In accordance with the Statement of Intent for this DPA the following investigations have been undertaken to inform this DPA:

1. Further investigations associated with possible land contamination and subsurface water contamination from past, present and surrounding uses across the area affected.
2. Investigation of potential vehicle traffic impacts arising from increased development potential and any access/road network improvements required.
3. Viability of retail and commercial activities, particularly the exiting Centres in a defined catchment of the Area Affected including in other council areas (eg in the City of Charles Sturt and the closest Local Centre Zone on the eastern side of Days Road.
4. An assessment of the impact of the potential loss of industrial land as a consequence of the rezoning.
5. A review of social infrastructure in the locality that supports envisaged land uses.
6. Review of local services infrastructure that is required to service future low to medium density residential development and/or mixed-use development, with a particular emphasis on the potential stormwater impacts associated with the proposed mixed use development given the flood risk across the Council area and the likely increase in impermeable surfaces arising from the possible redevelopment.
7. Potential application of the noise and air emissions overlay as a consequence of site's location adjacent the intersection of two major roads.
8. Identification of any Significant and Regulated Trees in the affected area.
9. Determination of the most appropriate zoning for the Area Affected based on the modules in the South Australian Planning Policy Library (SAPPL) to accommodate residential and mixed uses.

A summary of the investigations is provided under various subheadings in the following sections of this DPA.

3.3 Environmental Site History Assessment

Prior to the preparation of the Statement of Intent, investigations by *Agon Environmental* considered the large allotments fronting Regency Road and the central part of the Days Road frontage. These detailed investigations are relevant to approximately two thirds of the Area Affected. The earlier investigations have been updated in the report “*Detailed Site Investigation, Lot 2, 3, 102, 111 and 114, Croydon Park SA*” 28 August 2019, along with updated information dated 2 October 2020 and are provided as a supplement to this DPA.

A preliminary assessment of the environmental condition of all the remaining allotments in the Area Affected has been undertaken by *Agon Environmental*. These findings arising from a review of historical information of environmental site history are summarised in correspondence dated 28 August 2019 and 2 October 2020 for the fourteen allotments A-M (refer legend of allotments in **Figure 2** next page). The preliminary assessment provided as a supplement to this DPA also includes a summary of the soil and groundwater conditions beneath each allotment where available from the original detailed investigations.

3.3.1 Summary of Environmental Conditions in the Area Affected

Based on a range of detailed and preliminary investigations undertaken within the proposed rezoning area, Agon has identified the following notable environmental conditions at the site:

- Soils across Lot A, E to K and N contain minor impacts in the form of heavy metals, polychlorinated biphenyls (eg leaks of insulating fluid from an on-site transformer), total recoverable hydrocarbons (eg fuel and lubricant leaks) and benzo(a)pyrene. These impacts are present in shallow fill and natural soils. Where reported, reported impacts are neither significant nor widespread and are not likely to preclude the proposed zone amendment to a mixed-use development (including low to high density residential land use).
- Although no specific soil or groundwater investigations have been undertaken on Lots B to D, it is considered likely that similar shallow soil conditions to those observed in Lot A and Lots E to K are present. These allotments have an extensive history of commercial land use, including the use of Lot C for a service station and Lot C and D for mechanics’ workshops. These activities may be a source of related potential impacts, however, previous land uses and activities are not considered to preclude the ongoing use of these allotments for commercial purposes.
- It is unlikely that significant concentration of contaminants is present in soils underneath Lot L and M based on each allotment’s primary residential use of over several decades.
- Groundwater within the northern and central portion of the proposed rezoning area has been confirmed to neither be the source of receptor of groundwater-based impacts. The condition of groundwater within the remaining portions of the site including the southern allotments (Lot I to N) and the north-eastern allotments (Lot B to D) has not been investigated.

Figure 2: Agon Site History Assessment – allotment plan reference



- Petroleum based infrastructure is present within Lot K (aboveground storage tank) and Lot N (underground storage tank) and is likely present in Lot C (former service station site).
- Asbestos containing materials have been identified within Lot A and are likely to be present within existing building structures within the proposed rezoning area.

Agon Environmental has concluded from its assessments that there is no significant or widespread impact at the site which precludes the proposed zone amendment for the purpose of low to high density residential development and commercial uses. Where identified, any impacts are localised (eg in shallow soils or specific identified building materials) and through redevelopment of the land could be suitably managed and /or remediated in line with the envisaged uses.

3.3.2 Conclusions

Based on the results of the environmental consultant's preliminary assessment, there are no material issues that preclude the proposed rezoning for future residential development on the site.

Any measures to manage localised impacts may require management measures to enable the redevelopment as envisaged in the proposed rezoning. It is anticipated by the environmental consultant the required management and /or remediation measures are feasibly incorporated into the management plans for the demolition and civil works required for any redevelopment.

In this context, the Amendment will include a statement in the proposed Desired Character Statement for the Area Affected by adopting the wording applying to former industrial land in Northfield in the *Suburban Neighbourhood Zone*, namely:

"Development of land with a known history of potentially contaminating activity, from former industrial uses, will occur once the site has been assessed and remediated to the standard necessary to ensure it is safe and suitable for the proposed uses, including sensitive uses such as residential development".

Refer to amendment instruction 7 in The Amendment section of the DPA.

3.4 Transport Investigations

The *'Days Road and Regency Road, Croydon Park Development Plan Amendment: Transport Investigations'* has been prepared by Cirqa Pty Ltd and provided as a supplement to this DPA. The assumptions for the purpose of the assessment presume commercial within the northern third of the Area Affected and the balance being residential, noting that some mixed use developments may be established along the Regency Road and to a limited extent the Days Road frontage. The anticipated residential yield of up to 10 hectares (approximately) at 45 to 70 residential dwelling net per hectare (eg 450-700 dwellings) was considered as part of the analysis.

A summary of the key findings and recommendations are provided below.

3.4.1 Public Transport, Pedestrian and Cyclist Networks

Sealed footpaths are provided on both sides of Regency and Days Road. Pedestrian crossing movements are facilitated at each arm of the signalised intersection of Regency and Days Road. There are no other formal pedestrian crossing facilities adjacent the subject site.

There is no designated on-road cycle lane on either side of Days Road, although the surface is marked with the occasional cycle symbol in the traffic lane signifying a standard shared arrangement.

Regency Road provides cyclist facilities at restricted times (7.00am to 9.00am and 4pm to 6pm Monday to Friday). Both roads form part of the Bike Direct network.

Numerous regular public bus services operate along Regency Road and Days Road in each direction adjacent the Area Affected. Example bus routes include services between Port Adelaide Interchange to City (230 and 232), City to Rosewater (232R), Elizabeth to Adelaide Secondary School of English (949) and Rosewater to Adelaide Oval (A016).

Islington Railway Station located approximately 1km to the east of the Area Affected has frequent train services operating along the 'Gawler Central line' and is classified as a high frequency station by Adelaide Metro. This classification is given to stations that offer services approximately every 15mins, 7.30am to 6.30pm Monday to Friday.

The above attributes are desirable in identifying suitable locations for medium density residential development.

3.4.2 Road Network

Regency Road is an arterial road under the care and control of the Department of Planning Transport and Infrastructure (DPTI). It comprises two traffic lanes in each direction with a central median (painted and solid). A 60km/hr speed limit applies. DPTI data indicates there is an Annual Average Daily Traffic (AADT) volume of 23,400 vpd, of which approximately 5.6% are commercial vehicles.

Days Road is a major collector road under the care, control and maintenance of Council. It has an annual average daily traffic volume in the order of 9,000 vehicles per day (vpd). There is a single traffic lane in each direction with an urban default speed limit of 50km/hr.

The intersection is controlled by traffic signals with all relevant traffic movements permitted.

B-Doubles are allowed to pass through the intersection as both roads are gazetted for B-double use (permitted on Days Rd north of Gray Street located opposite the vacant allotment in the Area Affected) subject to some restrictions:

- No north-bound left-turns from Days Road onto Regency Road
- No east-bound right-turns from Regency Road to Days Road.

3.4.3 Traffic Generation and Distribution

The traffic assessment considered:

- a 12,000m² area for a commercial/activity centre, with the modelling estimated traffic volumes associated with a 5,500m² activity centre floor area, including a supermarket and other retail; and
- the remainder of the site (approximately 10.82ha) on the assumption of a Suburban Neighbourhood Zone medium density typical yield (average net residential density in the order of 45 to 70 dwellings per hectare, excluding all other land uses including roads, open space etc) generating a theoretical yield of approximately 750 allotments. This equates to an average site area of 144 square metres, but in reality,

URPS does not expect the total 10.82 hectares will be developed at this higher end of medium density residential development.

Adopting the maximum yields for the envisaged uses provides a conservative assessment with regard to traffic impacts on the adjacent road network. Informed assumptions of 'in and out' distributions in the a.m. and p.m. peaks are qualified in the report.

The report findings are (summarised):

- (a) Forecasts for the ultimate redevelopment of the site identify there will be an increase in traffic generation, albeit heavy commercial vehicle proportions will reduce (including B-double movements associated with the site) which will provide traffic capacity and safety benefits in the locality.
- (b) The provision of at least two primary connections (one on each existing road frontage) will adequately accommodate movements into and out of the Area Affected while minimising impact on through movement (noting associated recommendations for the consolidation of the total number of access points on Days and Regency Road).
- (c) The intersections can be provided as priority controlled T- intersections, treated with separated right-turn lanes, provision for two-stage right out movements (if right -turn movements out of the site are proposed, this should include a sufficient median opening to accommodate car storage) and an allowance for on-road bicycle lanes. Alternatives to the design and number of intersections to either road could be considered and assessed further during the planning and design stages.
- (d) The primary intersections should connect to an internal network in accordance with the Council's requirements, ensuring adequate provision for on-street parking, waste collection vehicle movements and appropriate traffic control treatments within the Area Affected.
- (e) SIDRA intersection modelling software used to compare the impacts of the existing site volumes against the future forecasts, indicates the impact of the proposal on the adjacent road network will likely require improvements to the Regency/Days Rd intersection. However due to the conservatism of the assessment, it is possible that the rezoning and development of the site will generate less movements than indicated, hence reducing the impact on the intersection.

The typical changes to the geometry of the intersection are identified in the CRIQA Intersection Upgrade Sketch assuming the 'maximum yields' are later developed (refer **Figure 3** in this section).

Where it relates to the Area Affected, achieving the estimated maximum 'theoretical yield' will result in a requirement for a minor upgrade to of the south-west corner of the Days Rd / Regency Rd intersection in order for the intersection to perform at a similar level to the existing situation.

The impacts of the change in the geometry affect the following:

Corner allotment 141 Regency Road (Bridgestone)

- The location of some free-standing signage and car parking positioned facing the corner of the site is within the area identified for possible changes to the intersection.
- There are two crossovers to the allotment on the Regency Rd frontage (based on the kerb construction), albeit the crossover closest to the intersection is likely not used given the proximity to the angled carparks adjacent the corner. The crossover to the west is unlikely to be impacted by the change in geometry and remains accessible via the internal driveway under the existing canopy.

- There are two crossovers to the allotment on the Days Rd frontage (based on the kerb construction) and there are no marked restrictions on entry – exit movements. The possible change in geometry is not likely to impact on the retention of the site’s southern-most crossover on Days Rd. Amending line marking is likely to provide a similar number of on-site spaces currently line marked and provided informally.

92 Days Rd

- This allotment is impacted to a lesser extent than its neighbour to the north. There is one ‘single width’ crossover (but flared at the kerb line) at the northern part of the allotment. It connects with the crossover of the corner allotment.
- Although the alteration of the carriageway to create the short (30m) high angled left-turn lane is likely within the existing road reserve, there may be some impact on the subject allotment to accommodate a corresponding change to the angle of the footpath.
- The area of the subject allotment in front of the building (a former dwelling, but potentially adapted for office or similar in association with a ‘workshop’ building at the rear) is entirely sealed with no car parking spaces marked. There appears to be some parking behind the front building. In any case, the indicative changes in the intersection geometry, if required, can be accommodated without substantial impact on this allotment in its current condition.

A bus stop is immediately south of the crossover to 92 Days Rd and may also need to be relocated with the change in geometry. It is anticipated the stop can be adequately accommodated in the road reserve further south of its current position.

There are no trees in the allotments or the road reserve that are impacted by the change in geometry of the intersection. There are stobie poles and overhead power lines that may need to be considered in the context of a minor intersection upgrade. The impact of the works on this infrastructure have not been quantified for the purpose of the DPA and will be the subject of further consultation with the relevant utility authority.

A similar minor upgrade is illustrated for the north-east corner of the intersection, outside of the Area Affected and adjacent a corner allotment which is potentially part of the larger TAFE college site. There are no access points, buildings or carparking areas impacted by the indicative geometry changes. Potentially two street trees could be impacted.

Figure 3 Intersection Upgrade Sketch

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This drawing is a concept only and subject to the provision of detailed survey information (by others) and the preparation of detailed design. The drawing is not suitable for construction purposes. The information and data identified within the drawing are the property of CIRQA Pty Ltd and copyright. This drawing and the information contained therein is for the use of the authorised client. The drawing may not be used, copied, reproduced or modified in whole or in part for any purpose other than for which it was supplied by CIRQA Pty Ltd. CIRQA Pty Ltd accepts no responsibility or liability to any other part who may use or rely upon this drawing or the information contained therein.

3.4.4 Conclusions

The analysis determined that a mixed use (commercial-residential) development, if developed to the maximum theoretical yield, is likely to require minor geometry changes to the Regency Rd/Days Rd intersection to perform at a similar level to the existing situation. Noting that the forecast rezoning volumes are considered conservative, the actual impact is likely to be less than indicated by the SIDRA results, hence possibly requiring a lesser extent of upgrade to the intersection than suggested. Further detailed analysis can be undertaken during the future development applications, noting that if lower yields are proposed at the land division / development application stage, limited (if any) off site road works will be required.

For example, CIRQA considered other scenarios associated with the theoretical triggers for the intersection upgrade. The analysis indicated the following yields could be accommodated without alteration of the intersection:

- a residential only scenario with a maximum threshold of 450 dwellings (ie average site area of 240sqm which is still within the net medium density range of 35 to 70 dwelling units per hectare as defined in The 30-Year Plan)
- commercial and residential – 1645m² of food related retail and 280m² of non-food retail plus 265 dwellings

The land is likely to be developed in stages, albeit the allotments are generally large holdings (with some exceptions along sections of the Days Road frontage) which is positive in terms of staged site redevelopment. Consolidating the smaller allotments into the larger allotments as part of the future redevelopment will obviously have a positive impact on coordinating access and the like, but is not essential to enable the rezoning to proceed.

Any land division or development proposal, including a design incorporating new internal roads and intersections into the larger balance of the Area Affected, will need to give consideration to the following key recommendations and should therefore be incorporated in a Desired Character statement and/or in principles of development control:

- Any change in use of land, or division of an allotment, with a frontage to Regency Road and or Days Road, should not occur until the design and location of a principal two-way access point (new public road intersection) on each of the main road frontages is determined for the Croydon Park area, based on a design that supports the traffic volume and distribution relative to achieving the ultimate yield (whether or not the zone develops in one stage or over a number of discrete stages).
- Development where practical, should result in the consolidation of the number of individual direct crossovers on Regency Road.
- Access via new public road connections into the zone will generally be limited to three principal access points (ie new public road intersections, one on the Regency Road frontage and up to two new road intersections on the Days Road frontage) and desirably each principal access (ie public road intersection) includes a separated right turn lane, and if provided, the design makes provision for two-stage right out movements through new median openings in Days Road and Regency Road.
- No new buildings or parking areas being constructed closer to the Regency Road and Days Road frontages, where it would prevent possible changes to the intersection geometry that may be required subject to the ultimate yield proposed.

The Desired Character and/or principles for the proposed zone will include relevant text to reflect the above, notwithstanding that other design solutions may be appropriate.

There is sufficient development assessment policy under the headings *Land Division* and *Transportation and Access* to guide the design and layout of a land division with appropriate regard to road design and access. On this basis a Concept Plan for the Area Affected is not envisaged as part of the DPA. It is also noted that the pending conversion of the Development Plan to the Planning and Design Code may not reproduce Concept Plans, hence a new concept plan may be obsolete after the transition to the Code.

3.5 Industrial Land Market and Retail Centres

3.5.1 Croydon Park Industrial Land Market Study

Property & Advisory prepared a report (June 2019) and corresponding communications (November 2020) on the effect that rezoning of the Area Affected may have on the industrial land supply in Adelaide's north-western suburbs and this is provided as a supplement to the DPA.

The investigations considered:

- industrial zones within 5km radius of the site (including gross area of land, vacant land and identification of absorption rates between 2009 and 2019)
- site history and current industrial uses on the site
- the effect on industrial land supply in the region as a result of the proposed rezoning.

Key findings are (summarised):

- (a) The total area of vacant industrial land in the 5kms radius of the site is estimated at 126 hectares.
- (b) Over the last 10 years (approximately) there has been a reduction of 3 hectares, or less than 1%, in the available supply of land coded 'vacant' by State government sources (DPTI).
- (c) The Area Affected has an area of 11.43 hectares, representing:
 - 0.5% of the total volumes of all Industry land in the 5km radius
 - 0.6% of all industry zoned land in the City of Port Adelaide Enfield
 - 5.4% of the land zoned 'Light Industry' in the City of Port Adelaide Enfield
- (d) The vacant land within the Area Affected is 3.645 hectares, which represents 2.8% of the current vacant supply within a 5km radius (the vacant land in the central proportion of the Area Affected has been vacant for some 70 years).

The Property & Advisory report's conclusion is that the statistics indicate the rezoning of subject site and removing the land from the stock of industrial land in the region would not have a material effect on the operation of the underlying market or on demand for the remaining vacant stock. On balance, there is no compelling strategic or commercial reason that the subject site cannot transition from its Light Industry Zoning and land use.

3.5.2 Croydon Park Retail Study

Property & Advisory Pty Ltd prepared the Croydon Park Retail Study (November 2020) and supporting correspondence which is provided as a supplement to the DPA. The investigation assesses the effect of a potential commercial centre that is being considered as part of the rezoning of the Area Affected. The analysis:

- considers the effect of two different sized centres within the Area Affected:
 - (a) *Scenario 1*: a 5,500sqm neighbourhood centre, comprising 4,500 sqm supermarket with 1,000sqm of smaller ancillary retail tenancies (development area approximately 12,000sqm including at grade parking);
 - (b) *Scenario 2*: a centre of some 2,000sqm retail floorspace (which assumes no full-line supermarket) with a scenario of 1,500sqm food and 500sqm non-food;
- considers retail trends that will impact directly on the required retail floor level for the site and surrounding retail catchment; and
- quantifies the effect of the development on the surrounding retail catchment.

The assessment takes into account competing retail centres:

- within a 1km radius: including the Croydon Park Centre directly opposite the subject site on the Days Road (large Asian grocery store and restaurants and takeaway food in a Local Centre Zone) and in other cases mostly local 'strip' shopping on three major thoroughfares surrounding Croydon Park (mostly food related retailing not in a centre zone and no full-line supermarket).
- within a 2km radius: including the Armada Arndale District Centre with three supermarkets and a Harris Scarfe Department Store; Churchill Centre North (Coles, Aldi and Costco); Churchill Centre South (predominantly large format stores, including Bunnings and Savers).

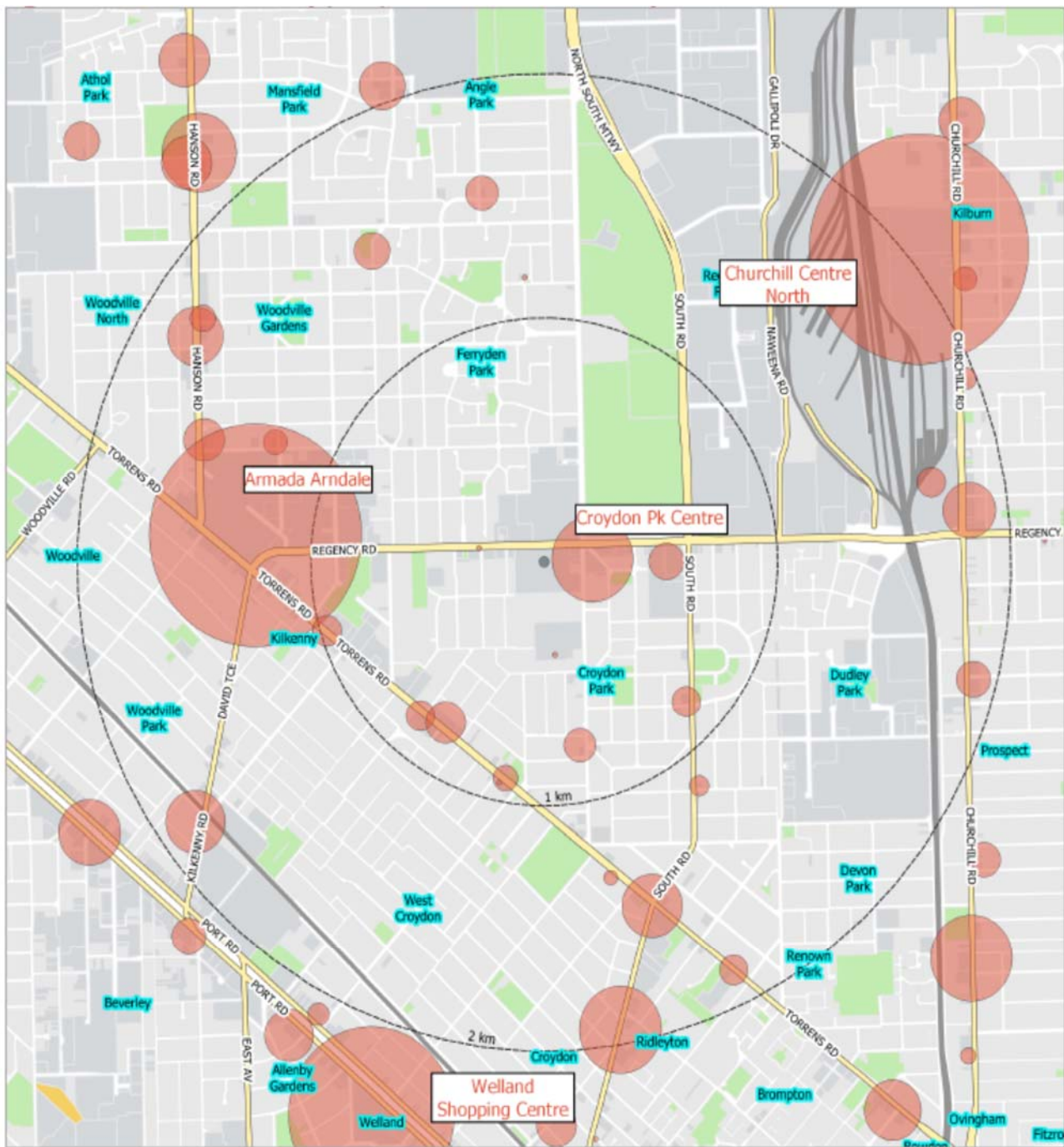
The total retail floorspace within a 2km radius is approximately 107,000sqm, comprising 26,500sqm of food floorspace and 74,000sqm of non-food (refer **Figure 4**).

The population count within a 2km radius of the site is expected to rise from 33,230 at the 2016 census to approximately 39,000 by 2031. Taking into account the proposed development of new housing in the Area Affected (and potential two other nearby sites the subject of separate DPAs under consideration by Council) this latter population figure could increase by an estimated additional 1,000 persons. This potential growth has been factored into calculations of the 2026 and 2031 projections in Property Advisory's analysis.

The analysis considered the Socio Economic Profile of the retail catchment (1km and 2km radius), including other factors such as age distribution, labour force, household income and house retail expenditure.

The report identifies that it is generally accepted in retail analysis that a negative effect on other centres of less than 5% is not significant. Negative effects on other centres between 5-10% would give rise for some concern, and effects above 10% might affect the viability and functioning of retail centres.

Figure 4 – extract Property Advisory Report – Relative Retail Gravity (food) 2km radius



Source: 2007 Adelaide Retail Database (DPTI, 2007), Property & Advisory (2020)

The key findings of the retail analysis are summarised as follows:

Scenario 1: 5,500sqm

1. Based on 2019 modelling of turnover, the results indicate that in both food and non-food retailing all of the surrounding main six retail centres would experience very minor declines in turnover per square metre (food retailing ranging from -1.21% to -1.58%; non-food retailing -0.40% to 0.41%).
2. By 2021 and thereafter, across all six centres, the modelling indicates positive growth in turnover per square metre when compared to the 2016 benchmark figures (eg in 2021 food retailing ranging from +3.59% to +3.81% positive growth; non-food retailing +4.64% to 5.01%).

As the initial decrease in turnover/sqm is less than 5%, the conclusion is that the effect of a neighbourhood centre of this floor area is not sufficient to give rise to concerns for the existing identified centres.

Scenario 2: 2,000sqm

1. Based on 2019 modelling of turnover, the results indicate that in both food and non-food retailing all of the surrounding main five retail centres would experience very minor declines in turnover per square metre (food retailing ranging from -0.56% to -0.44%; non-food retailing -0.35% to 0.38%).
2. By 2021 and thereafter, across all five centres, the modelling indicates positive growth in turnover per square metre when compared to the 2016 benchmark figures (eg in 2021 food retailing ranging from +4.63% to +4.87% positive growth; non-food retailing +4.67% to 5.05%).

The magnitude of the initial decline in turnover/sqm over the base year is less in Scenario 2 compared to the Scenario 1 given the lesser floor in commercial floor area in Scenario 2. As the initial decrease in turnover/sqm is less than 5%, the conclusion is that the effect is not sufficient to give rise to concerns for the existing identified centres.

3.5.3 Conclusions

The Property Advisory report concludes from the analysis of both scenarios that the effect of new retail development in the Area Affected on all the nearby centres tested is not sufficient to give rise to concerns on the future commercial health of those existing centres, nor the function and role of existing and approved centres.

The proposed zoning can therefore include the potential for a neighbourhood scale centre development as per Scenario 1. Any proposal for a smaller Scenario 2 centre is essentially a private sector landowner / developer investment decision.

Several other factors in the site's favour identified in the report are:

- The modelling and analysis does not account for the potential retail sourced from passing trade, particularly the northern part of the Area Affected which is considered well suited for fast food/ family restaurant and petrol filling due to the Regency Road traffic volumes.
- Whilst the current surrounding demographic is predominantly households within the lowest income quintile, it is anticipated that new residents within the Area Affected would fall within the 3rd or 4th quintile, with concomitant higher spending power
- The adjacent Local Centre Zone (Croydon Park Shopping Centres) is a very active local shopping precinct with no vacancies. There is anticipated potential to augment these uses in the Area Affected, with additional

shops to further target niche markets. If the residential development within the Area Affected reached scale by 2024, a 'walkability factor' locally may overcome some of the pull of the substantial large-scale retail centres in the 2km catchment.

- In addition to 'walkable' retail in the Area Affected, demand may grow for commercial floorspace for accountants, lawyers, real estate agents and para-medical accommodation as a result of the new resident population in the immediate locality.
- Although there is large format retailing at the Churchill Centre South, the potential for similar opportunities within the Area Affected could be tested given the exposure and profile of the Regency Road and Days Road frontages.
- Other potential uses on the site are: fitness centre, child care, household items and furnishings to service new developments in the area (eg paint, bathroom fittings, kitchen equipment, tiles, floor coverings) and sporting / cycling goods.
- A 'Suburban Neighbourhood' zone for the area affected therefore opens the possibility of mixed use buildings on both frontages, ie including mixed use (residential above ground floor retail) facing the Croydon Park Shopping Centre which would create a 'main street' feel on the non-arterial road through a concentration of local retail activity at ground level.

3.6 Infrastructure

The investigations involved general enquiries to understand the existing service networks, likely to be associated with the demand generated by envisaged uses as a consequence of the proposed rezoning and future redevelopment for residential / mixed use purposes. Relevant utility agencies will be provided with the DPA at the consultation stage for further comment. A Stormwater Assessment (Southfront September 2020) has also been received to inform the DPA investigations and is provided as a supplement to the DPA.

3.6.1 Stormwater Drainage

The investigations by Southfront involved the assessment of the existing stormwater drainage system and consider a broad-based catchment assessment as it relates to the performance of the existing Days and Regency Road drainage networks.

The subject land has access to three council drains, one in Days Road (of varying diameter) and Regency Road (of varying diameter), and a drain in Laurel Avenue (west of the Area Affected) which passes through the subject land to Days Rd. These systems all converge to a combined main drain at the intersection of Regency and Days roads.

Preparation of a Stormwater Management Plan for the broader catchment, referred to as the Barker Inlet Central Stormwater Management Plan, commenced in late 2019. This project includes participation from the City of Port Adelaide Enfield, City of Charles Sturt, City of Prospect and the Stormwater Management Authority. The 3-stage project is currently in stage 2 and has been subject to preliminary community engagement (completed early 2020) and investigations and is due for completion in mid-2021.

The Council will typically impose the following site-specific stormwater management requirements (summarised):

- (a) Stormwater detention, sufficient to reduce the post development 100 year Average Recurrence Interval ARI peak flow rate no greater than the pre-development 5year ARI peak flow rate (this could be relaxed if

further analysis of the downstream council system was found to have spare capacity in the drainage network).

- (b) The site drains to discharge to external drainage systems in a manner that mimics the current arrangements (ie so as to maintain distribution of flows to the respective system).
- (c) Gross pollutant traps appropriate to the nature of each discrete development type within the Area Affected, are to be provided to satisfy water quality improvement requirements.
- (d) Further measures to achieve broader water quality improvements are unlikely to be required in this instance due to the catchment draining to the Barker Inlet wetlands (although water sensitive urban design measures can be considered in the context of application for development assessment where required).
- (e) Preservation of existing council infrastructure through the site, with appropriate easements in favour of Council.

DRAINS modelling was used to consider the existing performance of the Regency and Days Roads drains and identify any deficiencies and consider options to address management (e.g. stormwater retention/detention measures). The assessment considered stormwater quality aspects related to the proposed DPA and opportunities for integration with the proposed stormwater management system.

The investigations determined that if the DPA site is redeveloped to full potential (ie medium density residential infill and other commercial with an estimated 80% impervious site coverage) it is suggested that a drainage system within the site be arranged to enable direct connection to the Days and Regency Road drains. It is suggested that appropriate detention storage and gross pollutant interception measures would be required in association with each nominated discharge point.

Subject to detailed detention storage analysis and design for a particular site wide or allotment/development area basis, required detention storage is estimated at 270m³ per hectare of development area and may be provided in the form of open storage (within a landscaped detention basin, or other surface areas where temporary inundation is tolerable) or in underground 'tank' arrangements.

The drain which runs through the subject land from Laurel Avenue is not designed to receive substantive flow from the subject land. Should higher discharge rates, or use of the Laurel Avenue drain be proposed to drain any more than 10% of the subject land, it is recommended that detailed whole of catchment analysis be undertaken of the respective drainage systems to determine current performance levels and impacts of changes to discharged from the subject land.

The recommendations will be the subject of further refinement in coordination and site planning and design development in the context of a land division or other development proposal.

No amendment to the current Development Plan is required as there is sufficient assessment policy to address stormwater management and design solutions.

3.6.2 Potable Water Supply (SA Water)

The Area Affected abuts an existing potable water main in Regency and Days Road. It is anticipated that all existing allotments are served with a connection to the mains infrastructure.

The specific size of internal water mains servicing future new allotments will need to meet SA Water potable water main supply standards and requirements and can be determined at the development application stage.

Augmentation charges are set by the service authority and consequently any future infrastructure provision will be met by the proponent of the future redevelopment.

3.6.3 Recycled Water

There is a 300 mm recycled water main opposite the Area Affected on the north-east quadrant of the Days Road / Regency Road intersection, running parallel to both those roads. This separation distance suggests the Area Affected does not have an existing connection to the recycled water network.

Recycled water is not suitable for use in residential development and its reticulation to future urban residential allotments (the primary envisaged use) is therefore not proposed.

3.6.4 Sewer (SA Water)

There are existing gravity sewer mains in Regency and Days Road of varying diameter running parallel with the area affected.

It is assumed that no substantial site grading (internal to the Area Affected) to achieve an internal gravity sewer system is required given the majority of the allotments in the Area Affected have a connection to the existing system.

The DPA investigations have not assessed if there is adequate capacity in the sewer system downstream to service new development, and further verification by SA Water will be sought as part of the DPA consultation process.

3.6.5 Gas (APA)

There is an existing medium pressure gas main running adjacent to the site along Days Road.

The APA Group (APA) assesses and makes the decision on supply to a new development based on its own business case analysis. The APA's assessment takes account of the anticipated demand for gas and the cost to supply. Headworks are the responsibility of the APA Group should it choose to supply. Any detailed assessment by APA will likely occur at a land division application stage, taking into account future allotment layout and potential demand and then comment on whether there is sufficient capacity to service the entire rezoned area and/or whether headworks are required.

3.6.6 Electrical Supply (SA Power Networks)

There is an existing 11 Kv high voltage overhead power line along Regency Road and Days Road serving the Area Affected. There is a small section of High Voltage underground cable adjacent Days Road in the locality of the common boundaries of allotments labelled H, I and K in **Figure 2** of this DPA (reproduced from the Agon report).

It is reasonably assumed the future development will require the installation of underground electrical reticulation including street lighting and low voltage cables.

DPA investigations do not include an assessment of whether the surrounding infrastructure has the available capacity to cater for the redevelopment of the Area Affected. However, it is reasonably anticipated that the majority, if not all allotments, have an existing connection, and the reduction in comparatively high demand from various uses in the area, including industry, will be concurrent with 'new' demand generated through staged redevelopment for residential uses (at least two thirds of the site) and the balance being envisaged

commercial/mixed uses. In an case, augmentation charges are typically at the cost of a proponent of the future redevelopment.

SAPN will be consulted further as part of the DPA consultation on network capacity and advice on any augmentation works that may be required to service new development.

3.6.7 Telecommunications infrastructure

No impediment to the provision of new telecommunications internally in the Area Affected is anticipated. It is envisaged that the majority if not all existing allotments have a connection to Telstra infrastructure, or are able to be connected. All new telecommunicates are typically laid in a common services trench (CST) running under verges and footpaths. Where there is existing telecommunications infrastructure within the Area Affected, it may become redundant and require removal, but that will depend on the detail of any proposed redevelopment and be negotiated by the Developer with the relevant telecommunications service provider.

It is assumed that NBN will extend its network into the future site redevelopment. NBN has advised it will be able to serve a proposed new Suburban Neighbourhood Zone on Days Road approximately 550 metres to the north of the Area Affected in this DPA. The same standard requirements of NBN will apply for connection in the case of the Area Affected in this DPA.

3.7 Interface considerations

3.7.1 EPA Licenced Activities and other industry in the Locality

There is one site within the Area Affected (refer **Figure 5**) that is an Environment Protection Authority (EPA) licenced activity. It may represent a constraint to future residential use in the Area Affected while operational (in terms of noise). The Agon assessment (refer Section 3.3) concluded that based on the data collected from the detailed site history and a soil analytical programme targeting chemical compounds, there is no evidence to indicate soil conditions will preclude a change in use. Given the proximity of the EPA licenced site to other residential development to the east, west and south of the Area Affected, it is envisaged that the continuation of this use would not necessary preclude new residential development in other parts of the Area Affected.

Three other EPA licenced sites identified in **Figure 5** are towards the outer edge of the defined 1km radius from the Area Affected. These are in closer proximity to established residential areas than the Area Affected and in this context are not considered a constraint to future mixed use development within the site.

The balance of the Light Industry Zone that currently applies to the Area Affected extends to the north on the opposite side of Regency Road. The investigations did not identify any EPA licenced activities in the Light Industry Zone that may represent a constraint to future residential use in the Area Affected.

Other Industry and Light Industry Zoned land, and generalised industrial land uses (DPTI sources current 2018) are identified in **Figure 5** and **Figure 6**. The majority of these are well separated from the Area Affected and or in closer proximity to other residential uses, such that they are not considered a constraint to future residential uses within the site.

Under the General Section *Industrial Development* heading of the current Development Plan:

- principle 6 does not support future development of new special industries in the Light Industry Zone to the north

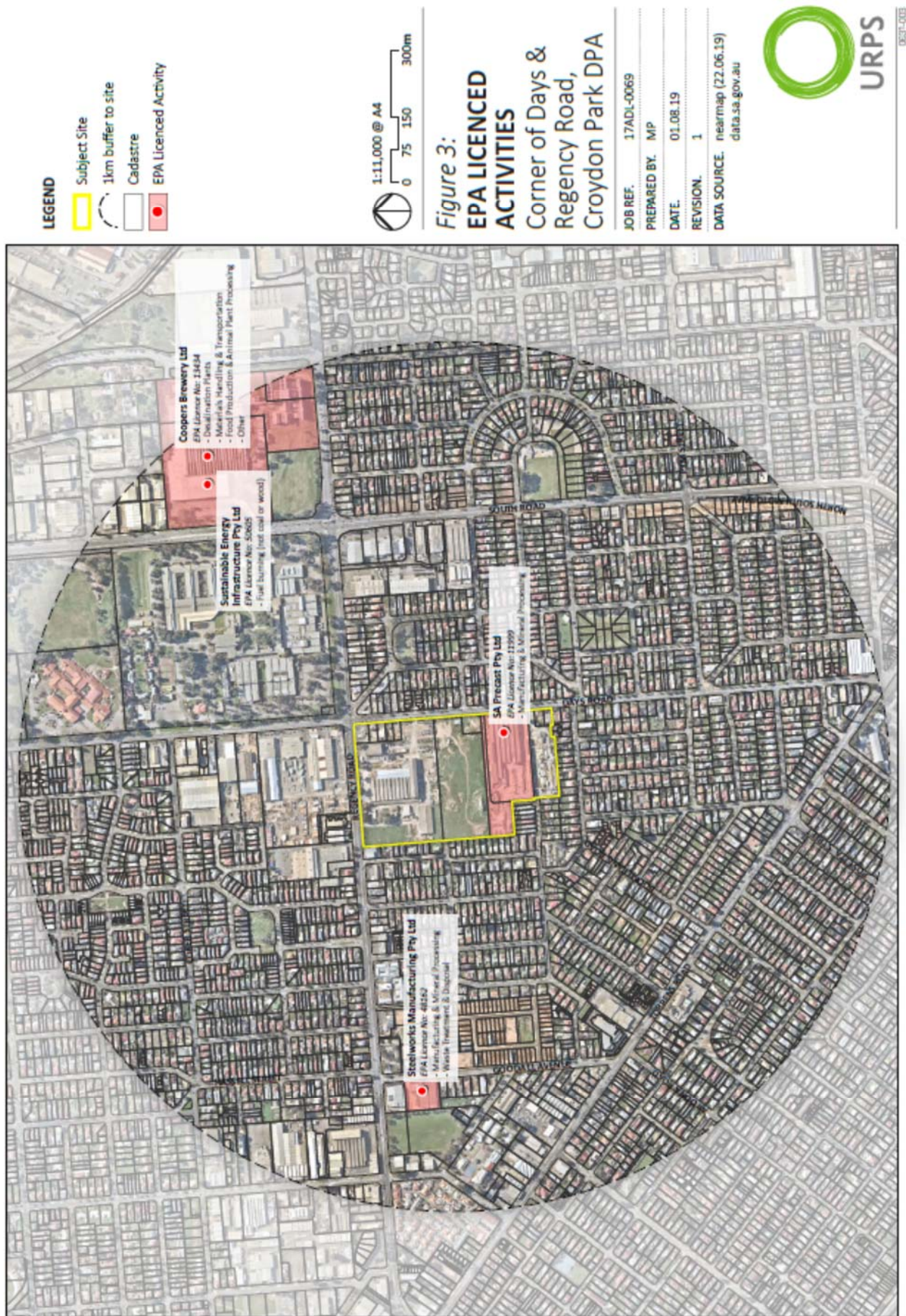


Figure 5: EPA Licensed Activities

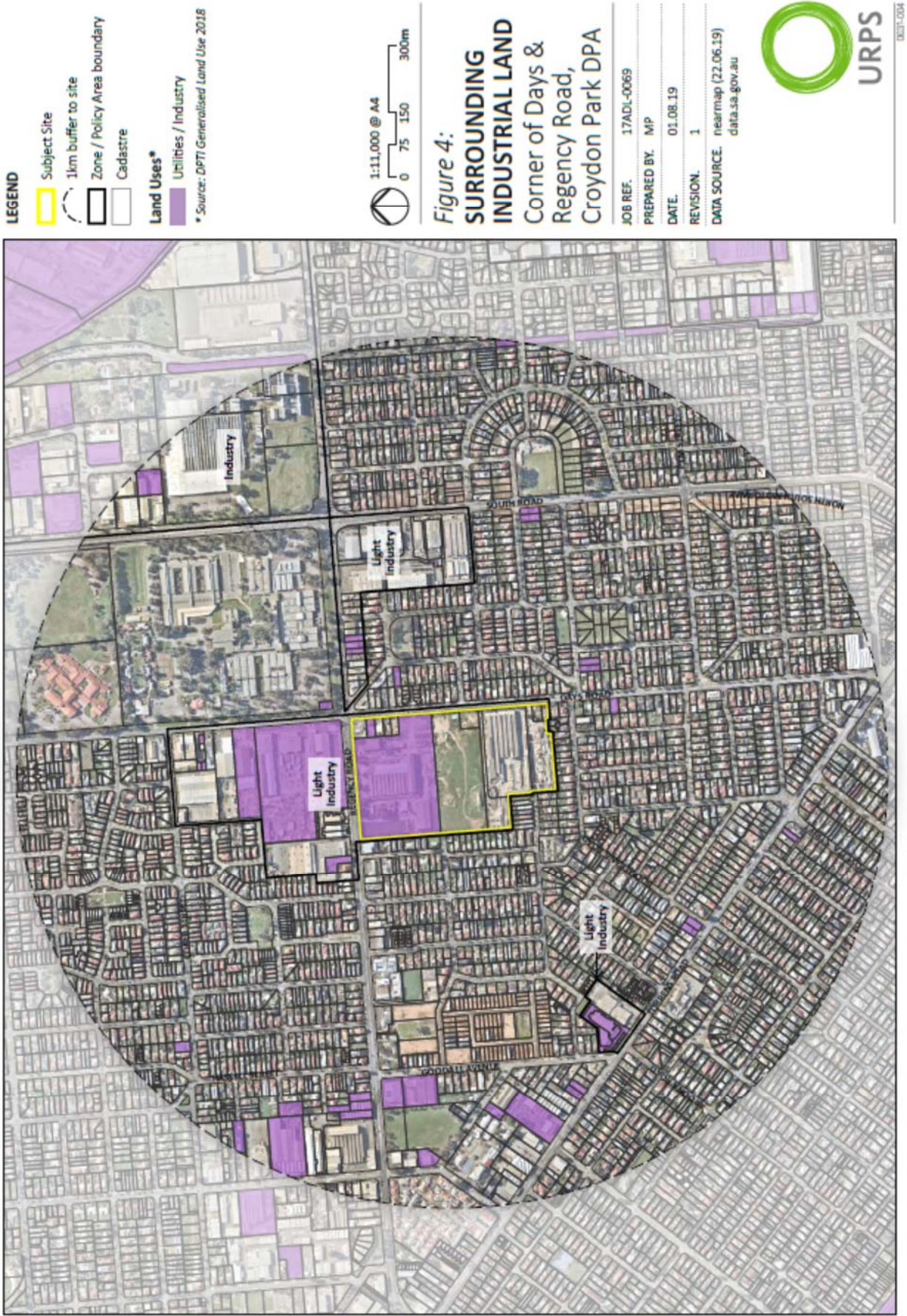


Figure 6: Surrounding Industrial Land

- principle 7 discourages expansion and/or intensification of existing special industries unless its demonstrated that it will “*result in a significant net benefit in terms of amenity and/orenvironmental impacts*” and/or it involves the generation of renewable energy.

Under the current zoning and Industrial Development provisions, future development in the Light Industry Zone is unlikely to result in intensification of existing or potential new industries that would prevent development of the Area Affected for residential purposes.

Further consultation with the EPA will be undertaken as part of government agency consultation on the draft DPA.

3.7.2 Potential Noise impact on future uses

Resonate completed an environmental noise assessment for the Area Affected to ensure compliance with relevant requirements to protect new noise sensitive developments from noise emissions in light of the site’s proximity to main roads and the relationship between the proposed retail activity and residential use.

The assessment investigates potential noise issues from the proposed change in use including:

- (a) noise requirements arising from the Environment Protection (Noise) Policy and the Port Adelaide Enfield Development Plan
- (b) the control of traffic noise to proposed noise sensitive land uses in accordance with the Minister’s Specification SA 78B – *Construction Requirements for the Control of External Sound*.

Noise measurements were taken at four locations at the periphery of the site to quantify the existing environment for the assessment of potential future noise impacts. The instruments, procedures and results are documented in the Resonate report “*Corner Days and Regency Roads DPA Environmental Noise Assessment*” 20 August 2019 and is provided as a supplement to this DPA .

Key findings are:

- (a) the range of noise levels measured at Regency Road are consistent with road traffic noise levels expected from a Type B Road (ie 25,000 – 49,999 vehicles per day), albeit DPTI annual average daily traffic volume is in the order of 23,400 vpd (CIRQA report 13 Sept 2019) .
- (b) Days Road has lower traffic noise levels than Regency Rd and does not have a relevant classification based on noise measurements or road type (ie CIRQA reported DPTI data of 9,000 vehicles per day).
- (c) Application of the South Australian Planning Policy Library (SAPPL) *Air and Noise Emissions Overlay* is recommended for mixed use zones in order to address potential issues associated with noise sensitive land uses location in close proximity to commercial or entertainment noises sources.
- (d) The recommended extent of the Noise and Air Emissions Overlay ‘Designated Area’ is 60m from the cadastral boundary of Regency Road, in addition to the full extent of any area of the site zones for mixed use.
- (e) Whilst the Minister’s Specification requirements are able to be met with appropriate façade construction, it is recommended that less sensitive commercial land uses are location along the Regency Road frontage where practicable.
- (f) Noise from industrial activities on the northern side of Regency Road were not audible at the attended measurement positions. Rather road traffic noise was the dominant noise source.

- (g) Design for control of road traffic noise from Regency Road or Mixed Use sources (ie mechanical plant such as air-conditioning, noise associated with vehicle movements, such as carparking areas) in accordance with SA 78B is expected to protect future development from other noise sources in the areas associated with existing businesses.

3.7.3 Potential Air Emissions Impact on future uses

A desktop assessment of potential air emission sources was undertaken. This assessment was based on the risk associated with the future use of the land for both sensitive (residential) and non-sensitive (retail) land uses.

A review of land use information for the locality shows:

- The dominant land use occurring to the east (across Days Road), immediate west and south is residential in nature and of little to no impact on air emissions;
- Land uses to the north are a mix of industrial, retail and commercial with recognised potential to cause air emissions.
- A range of commercial and retail activities occur at the intersection of Regency and Days Road which are not anticipated to result in the generation of air emissions which would result in impact to the DPA area.

Whilst noting the presence of industrial activities in the locality, the DPA proposes to facilitate the siting of an activity centre to the northern boundary. This centre would front Regency Road and comprise a mix of uses in the form of ground floor retail and local businesses (eg hairdresser, pharmacy, newsagent, office) gym, child-care and may include a full line supermarket. The land uses proposed are have low potential to create air emissions, whilst the presence of this centre will result in greater separation being afforded between identified industry land uses and new sensitive land uses (residential).

Given the above, the likelihood of air emissions resulting in impact to future sensitive land uses is considered low.

3.7.4 DPA Recommendations

The site within the Area Affected facing onto Regency Road is considered the most suitable for a proposed activity centre (retail/commercial) and could include residential above ground floor uses.

The SAPPL *Air and Noise Emissions Overlay* is applied to locations where it is desirable to protect noise and air quality sensitive development (eg. residential, Urban Core, Urban Corridor and Suburban Activity Node).

All allotments in the Area Affected have a frontage to either Regency Road and/or Days Road. Regency Road is classified as a secondary arterial by Transport Map PAdE/35. The acoustic engineer refers to the classification of Regency Road in *Technical Information Sheet 8 - Air and Noise Emissions Overlay 3* as a Type B Road (ie 25,000 – 49,999 vehicles per day) and in any case the Overlay is intended to apply to mixed uses zone such as a Suburban Neighbourhood Zone, Urban Corridor and others.

The SAPPL *Air and Noise Emissions Overlay* will therefore apply to the Regency Road frontage as it is proposed the Area affected is rezoned as a mixed use zone where urban renewal is envisaged next to this noise source.

An *Air and Noise Emissions Overlay* will be created to apply to PAdE/35 and identify:

- Regency Road in front of the Area Affected as a “Designated Road: type B road”
- The northern third of the Area Affected as “Noise and Air Emissions Designated Area” (although the extent shown is greater than the engineer’s recommended 60metres from the Regency Road cadastral boundary, it aligns with the full extent of the area proposed for mixed use and is therefore consistent with the acoustic engineer’s recommendation).

There are existing provisions in the Development Plan that apply to development of land where the overlay applies. The Minister’s specification also includes performance criteria and Deemed-to-Satisfy provisions that will apply to noise sensitive land uses. Alternative solutions to mitigating noise impacts can be considered at the development application stage through an acoustic consultant demonstrating compliance with the performance requirement. No additional Development Plan provisions are required as a consequence of rezoning the land.

Refer Amendment Instruction 15 and Attachment I.

3.8 Social Infrastructure Assessment

3.8.1 Overview of community assets

A Social Infrastructure Assessment (URPS, October 2020) reviewed a study area defined by an approximate 2.5km radius around the Area Affected. Examples of social infrastructure typically include health, education, public housing, civic and utility functions and transport. This report is provided as a supplement to this DPA.

The Report identified the Area Affected as in a region experiencing an annual percentage population change among one of the highest in Metropolitan Adelaide. Of the community assets identified across 10 categories (refer to **Figure 7**), it is concluded in that Report that the proposed development of the Area Affected for residential purposes is unlikely to present particular capacity issues on local infrastructure.

Nevertheless, subject to the residential zoning module adopted, there will be an opportunity for non-residential facilities as existing residential zones include a list of envisaged non-residential uses. For example, in the existing Suburban Neighbourhood Zone envisaged uses in principle 1 in the form of ‘social infrastructure’ and other non-residential uses include:

- community centre
- consulting room
- educational establishment
- entertainment venue
- hall
- hospital
- indoor recreation centre
- pre-school
- primary school
- recreation area
- training centre

By reference to Suburban Neighbourhood Zone principle 5, non-residential development is contemplated outside of an identified ‘activity centre’ (ie if not designated nor identified on a concept plan) where they:

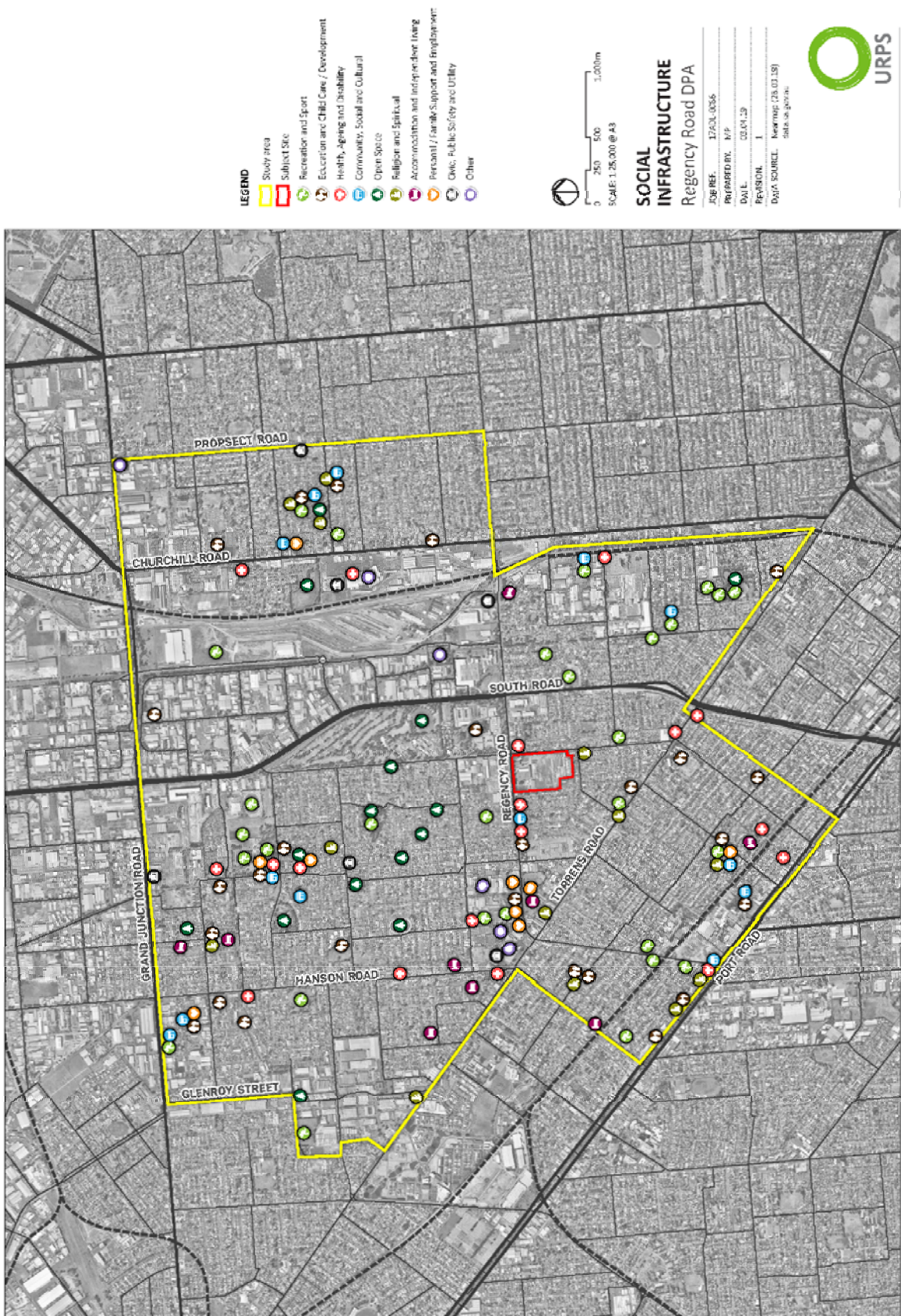
(a) comprise small scale uses that serve the local community

- (b) are of a nature and scale consistent with the character of the locality*
- (c) do not compromise the capacity to achieve coordinated activity centre development*
- (d) do not detrimentally impact on the amenity of nearby residents*

Having regard to all the above, the Suburban Neighbourhood Zone envisages a sufficient range of land uses that are consistent with the vision for the Area Affected. The Desired Character statement for the Croydon area of the zone can specifically envisage a neighbourhood 'scale' activity centre such that related 'social infrastructure' forms of development are envisaged. The Area Affected will not need to be identified as a separate policy area. There are existing statements in the Suburban Neighbourhood Zone Desired Character Statement and principle 1 that become applicable through the rezoning.

It is also noted that the *Planning and Design Code* will not utilise Concept Plans in the same manner at the Development Plan, focusing primarily on infrastructure and staging matters. On this basis a concept plan designating a '*neighbourhood activity centre*' is not proposed for this area affected.

Figure 7 Social Infrastructure



3.8.2 Location and capacity of public open space

Regency Oval is within approximately 600 metres north east of the Regency Road boundary of the site. There are pre-existing paths through the TAFE campus which increase the connection to the oval.

There are four public open spaces to the east of the site throughout the residential area, these vary from small corner lots to more substantial playing fields and open space. The largest is 480 metres from the south eastern most tip of the development.

All the above are identified in the Development Plan as Local Reserves on Location Map PAdE/29 and PAdE/35.

The general locality is therefore reasonably well served by a range of public open space, an attribute relevant to identifying suitable locations for medium density residential development (eg typically an average net residential density in the order of 45 to 70 dwellings per hectare).

Given the close proximity to established areas of public open space, it is unlikely that the Area Affected would require more than the standard 12.5% (ie 1.5 hectares of a total of approximately 12 hectares). Compliance with the Development Act open space contribution provisions can be collaboratively undertaken with Council at a future development application stage, once the staging and ultimate design/development is understood.

3.8.3 Affordable Housing and Residential Demand

The Property & Advisory Retail Study (June 2019) prepared for this DPA considered a wider catchment of 2km radius around the Area Affected for the purposes of considering the impact on existing retail centres. In that report there are key socio-economic characteristics of the wider catchment that are relevant to the topic of housing and affordability:

- The local catchment (1km radius) which includes Croydon Park and Ferryden Park, is characterised by:
 - substantially lower per capita income than Greater Adelaide average
 - household incomes that are concentrated in the lowest quintiles , particularly in 1km radius of the Area Affected
 - a low percentage of owner-occupiers/purchasers and a correspondingly high percentage of renters
 - high proportion of zero car households.
- Much of the Croydon Park residential area consists of older housing (median construction year 1956) on large allotments (median size 678sqm) and the wider locality developed with a large proportion of public housing.
- Much of the north-east quadrant of the wider catchment (2km radius) is industry (Regency Park, Dudley Park) and other non-residential (retail, Islington rail yards) hence opportunities for residential infill with greater housing diversity are limited to the balance of the catchment, which is considered very accessible to a range of centres, including Armada Arndale and the city centre via public transport.
- Although population projections for the wider catchment over the period from 2016-2031 indicated an overall increase of 17.9%, the majority of the growth is expected in Hindmarsh-Brompton (substantial infill redevelopment is occurring in Bowden-Brompton) and Prospect (eg high density housing on Churchill Road). A below average population increase of 13.5% is projected for 'The Parks'.
- The report also notes that the percentage increase in the number of households from which a proposed centre might draw its customers is anticipated to be greater than the rate of population growth – thus

demonstrating there is a decline in occupancy rates over time. This is indicative of the need for more housing choice as envisaged in the Planning Strategy for Greater Adelaide.

The 2017 Update of The 30 Year Plan reported the supply of residential land in the right locations (eg such as close to public transport, jobs and services) remains a priority, and the challenge is to identify new development opportunities within established suburbs.

Supporting affordable housing options is one way in which Adelaide maintains its housing affordability advantage compared to other state. Part of affordable living includes transport costs, the second largest component of household expenditure. The total 20-year cost per household (factoring in interest payments and travel costs) can be significantly higher for people living in the outer metropolitan areas compared to those living in inner and middle ring suburbs.

Croydon Park is in the 'middle ring' and is well placed to contribute to the adequate supply of well-located land into the future.

3.8.4 Conclusions

The provision of affordable housing forms part of the government's broader approach to address the issue of housing affordability. Affordable housing is described under the *South Australian Housing Trust (General) Regulations 1995* as meeting a pre-determined affordable price point (which is updated each year), being sold to an eligible buyer and having a legal agreement in place to secure the desired outcomes.

The Affordable Housing Overlay provides the means of representing areas in a Council Development Plan where this policy will be adopted. *Technical Information Sheet 6 – Affordable Housing Overlay 1* states that the overlay must be selected and mapped to apply to the whole of a Suburban Neighbourhood Zone (when applied to new areas) and other specific zones. The Area Affected will therefore be identified as an area where this overlay and the associated Overlay Section provisions under the heading *Affordable Housing Overlay*.

No additional objectives and principles of development control are required as a consequence of applying the affordable housing overlay.

Refer Amendment Instruction 15 and Attachment I.

3.9 Identification of Significant and Regulated Trees

The Area Affected has been surveyed by professionals in arboriculture *Symatree*. The Survey identifies:

- Regulated and Significant trees, where tree damaging activity and removal constitutes 'development' under the Development Act and Regulations. Development impact and/or removal requires an application for approval and is subject to an assessment against the Development Plan
- other street trees in Days Road (there are no street trees in Regency Road adjacent the Area Affected) which are under the care and control of Council.

The recommendations are based on a consistent 'Tree Retention Rating' system as detailed in the report which is provided as a supplement to the DPA investigations.

In total 37 trees were assessed (refer **Figure 8** next page):

Figure 8: Surveyed Trees 1 - 37



Extract Arborman 'Regency Rd DPA, Tree Management Plan' May 2019

- 17 are located in the Area Affected, within the area bound by Regency Road and Days Road (1-13, 27, 35, 36 and 37), and
 - Seven Regulated trees (subject to assessment against the Development Plan) are identified as either dead or in severe declining health and or structures, and or considered to be of low value. The report indicates support for removal of these trees (numbered 2, 3, 5, 6, 11 and 35).
 - The balance of 10 trees assessed are either Significant (no. 9) or Regulated (numbered 4, 8, 10, 12, 13, 27, 36 and 37). These trees are not specifically recommended for retention and the development impact (including removal) may be considered in the context of realising envisaged development in the proposed zone as part of a future development application.
- 20 trees are located within the Days Rd road reserve under the care and control of council (14-26 and 28-34). The majority of the street trees are considered worthy of retention (other than no. 20 and 21). A development application is not required, but the trees cannot be removed without council support.

Overall, the majority of the trees are at the periphery of the site or in the road reserve. The impact of new roads, services and built form can be managed in a way that minimises the impact on the trees of retention value.

The Development Plan includes provisions for the assessment of development impact on Regulated and Significant trees hence no additional objectives and principles are necessary as part of the DPA. The impact on trees in the Area Affected can be considered in the context of a land division or other development application.

The trees recommended within this report to be maintained are in their majority along the major roads and would be a council responsibility. However, this is subject to ongoing future management by Council, design options and the use of tree sensitive construction measures outlined as part of this report are incorporated into the future design and construction of the potential works adjacent to these trees as part of the proposed Project.

It is proposed to include a reference in a Desired Character statement identifying the existing landscaping (including non-regulated trees) and its contribution to the amenity of the area affected.

3.10 Recommended Zoning of the Area Affected

The conclusions arising from the investigations are that there is a significant opportunity for the land to be rezoned for residential and/or mixed-use purposes.

The Suburban Neighbourhood Zone in the Port Adelaide Enfield Development Plan (derived from the SAPPL) provides relevant objectives and principles to guide the development of the Area Affected including objectives and principles guiding the desired:

- range of dwelling density
- variety of dwelling types
- envisaged land uses including residential and non-residential activity centre uses
- effective and economic provision of public infrastructure and community services

- sustainable development outcomes
- sensitive development design to protect future residential amenity and the operation of existing lawful uses.

The Suburban Neighbourhood Zone therefore appropriately meets strategic directions and likely future development demands and needs associated with delivering new urban form envisaged in *The 30-Year Plan for Greater Adelaide* compared to other mixed use and residential zones.

The DPA can therefore introduce area specific amendments that relate to the proposed Croydon Park area of the Suburban Neighbourhood Zone, particularly in the Desired Character Statement to address:

Objective 8 *“Development that contributes to the desired character of the zone.”*

Principle 8 *“Development be consistent with the desired character of the zone.”*

Refer Amendment instructions 1-10 applying to amendments in the existing Suburban Neighbourhood Zone.

Other General modules from the SAPPL that are included in the Port Adelaide Enfield Development Plan provide sufficient guidance for the assessment of residential development in the Area Affected. The key relevant development assessment policy modules that apply to the assessment of development (regardless of zoning) of the type envisaged in the Area Affected include:

- Advertisements
- Centres and Retail Development
- Community Facilities
- Design and Appearance
- Interface between Land Uses
- Land Division
- Medium and High Rise Development (3 or more storeys)
- Open Space and Recreation
- Residential Development
- Regulated Trees
- Significant Trees
- Supported accommodation and Housing for Seniors
- Transportation and Access

No further amendment of the General Section of the Port Adelaide Enfield Development Plan is required as part of the DPA.

4. Recommended Policy Changes

Following is a list of the recommended policy changes based on the investigations of this DPA:

- Rezone the Area Affected as Suburban Neighbourhood Zone and accordingly amend Map PAdE/35 and insert the map reference in the Map Reference Table.
- Insert text relevant to Croydon Park (the Area Affected) in the Desired Character statement of the Suburban Neighbourhood Zone in the existing format under subheadings *Housing, Activity Centres and Non-Residential Uses, Access, Open Space and Site Contamination*.
- Amend Suburban Neighbourhood Zone by inserting a new principle (Attachment G) to identify the additional types of non-residential development that are envisaged in that part of the zone Croydon Park within a Neighbourhood Activity Centre (note that a Concept plan is not proposed to designated a site for a Neighbourhood Activity Centre but the Desired Character statement is amended to address the fact that a Neighbourhood Activity Centre is envisaged - refer Attachments C and D)

The *Air and Noise Emissions Overlay* will apply to part of the Area Affected and an overlay map will be created to apply to map series PAdE/35 identifying:

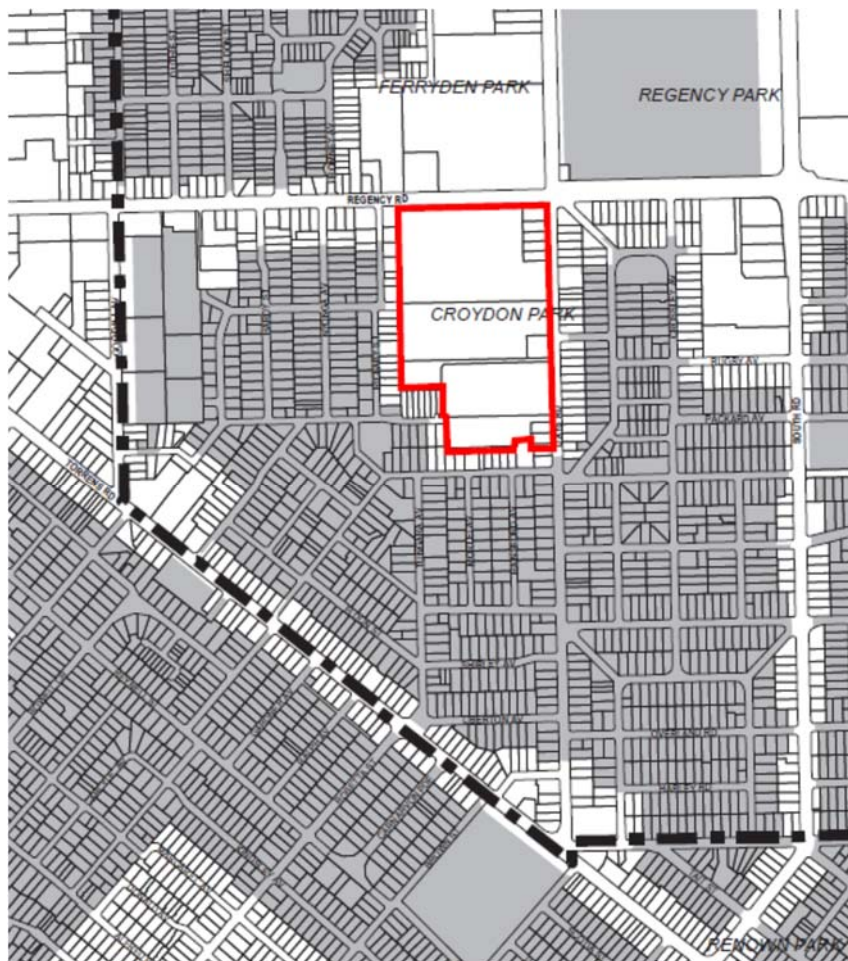
- Regency Road in front of the Area Affected as a “Designated Road: type B road”
- the northern third of the Area Affected as “Noise and Air Emissions Designated Area” (although the extent shown is greater than the engineer’s recommended 60metres from the Regency Road cadastral boundary, it aligns with the full extent of the area proposed for mixed use and is therefore consistent with the acoustic engineer’s recommendation).

The *Affordable Housing Overlay* will apply to the Area Affected and an overlay map will be created to apply to map series PAdE/35 to identify the whole of the area proposed for rezoning as an ‘Affordable Housing Designated Area’.

5. Consistency with the Residential Code

The Residential Development Code was introduced in 2009 to make simpler, faster and cheaper planning and building approvals for home construction and renovation.

The DPA introduces a residential zoning in the form of the Suburban Neighbourhood Zone over the Area Affected – outlined approximately in red below. Minimum site area and minimum frontage widths will apply for a range of dwelling types, including detached dwellings and semi-detached dwellings.



Extract Port Adelaide Enfield Council Residential Code map PAdE/38

Note the allotments abutting the western and southern boundaries of the Area Affected, are potentially excluded from the Residential Code currently by virtue of their common boundary with the Light Industry Zone. If the DPA is adopted, the Minister can give consideration to applying the Residential Code in those locations or selected allotments.

It is therefore a 'new' area in which the Residential Code (in the context of Development Regulations Schedule 4 complying development, clause 2 B—New dwellings) can apply in the Port Adelaide Enfield Council. The Area Affected by the proposed zone can therefore be gazetted as a residential code area by amending Residential Code Map PAdE/38 and detached dwellings and semi-detached dwellings can be Code assessed (subject to conditions).

'Residential Code' complying forms of development do not extend to group dwellings, row dwelling or residential flat buildings that are also envisaged in the residential provisions introduced for the Area Affected identified in this DPA. These dwelling types will be assessed on their merits (neither complying nor non-complying).

Also refer to Section 2.3 of the DPA for information on transitioning the Port Adelaide Enfield Council Development Plan (including amendments consolidated prior to mid 2020) to the Planning and Design Code.

6. Statement of Statutory Compliance

Section 25 of the *Development Act 1993* prescribes that the DPA must assess the extent to which the proposed amendment:

- accords with the Planning Strategy
- accords with the Statement of Intent
- accords with other parts of council's Development Plan
- complements the policies in Development Plans for adjoining areas
- accords with relevant infrastructure planning
- satisfies the requirements prescribed by the Development Regulations 2008.

6.1 Accords with the Planning Strategy

Relevant strategies from the Planning Strategy are summarised in the Appendices of this document. This DPA is consistent with the direction of the Planning Strategy.

6.2 Accords with the Statement of Intent

The DPA has been prepared in accordance with the Statement of Intent agreed to on 7 December 2016. In particular, the proposed investigations outlined in the Statement of Intent have been addressed in Section 4 of this document.

6.3 Accords with other parts of the Development Plan

The policies proposed in this DPA are consistent with the format, content and structure of the Port Adelaide Enfield Council Development Plan.

For instance, the existing Suburban Neighbourhood Zone, as derived from the SAPPL, has been determined as the most suitable for the Area Affected and the amendment instructions and policy structure are drafted accordingly.

The Suburban Neighbourhood Zones applying across Port Adelaide Enfield Council all have a density around 35 dwellings per hectare, or even slightly higher. Most notably Westwood to the north of the DPA site has a density between 35 and 38 dwellings per hectare. This higher density that is also seen in the core areas of Lightsview, Northgate and Northfield developments. The proposed policy approach is therefore consistent with other areas identified and or redeveloped as part of urban renewal projects in Port Adelaide Enfield Council area.

6.4 Complements the Policies in the Development Plans for Adjoining Areas

The proposed Suburban Neighbourhood Zone intended for the Area Affected is consistent with the SAPPL module and existing local additions. The provisions apply to land where an increase in a range of residential types and densities is envisaged for redevelopment of underutilised land. This is a module that has been adopted for land with similar characteristics and development opportunities in the Metropolitan Area.

In any case, the Area Affected is entirely within the council boundary. The closest neighbouring local government area boundary is Charles Sturt Council, approximately 500metres - 600metres to the west and south-west of the Area Affected. The closest residential areas in the Charles Sturt Council suburbs of Kilkenny and West Croydon also contain large areas of Residential Code affected land.

Kilkenny Mixed Use (Residential and Commercial) DPA

Consultation has concluded on the *Kilkenny Mixed Use (Residential and Commercial)* privately funded DPA. The area affected by this DPA is within a 5km radius of the Area Affected by this DPA and is in closer proximity to Arndale District Centre than the Area Affected in this DPA.

St Clair Residential Draft DPA

Consultation has concluded on the *St Clair Residential Draft DPA (Privately Funded)*. The site of this DPA is within a 2.5km radius and in close proximity to the St Clair activity centre and closer proximity to the Arndale District Centre than the Area Affected in this DPA).

Woodville Road and Environs Revitalisation DPA

The *Woodville Road and Environs Revitalisation DPA* is yet to commence consultation.

Albert Park Mixed Use (Residential and Commercial) Draft Development Plan Amendment

The *Albert Park Mixed Use (Residential and Commercial) DPA* is yet to commence consultation.

Accordingly, the policies proposed in this DPA will not affect and will complement the policies of Development Plans for adjoining areas.

6.5 Accords with Relevant Infrastructure Planning

This DPA investigations include a review of existing service infrastructure provision to the Area Affected. A future medium density residential development is able to be appropriately serviced or augmented where necessary through the course of land division and development. Council's infrastructure planning for the Council area is not impacted by this DPA.

6.6 Satisfies the requirements Prescribed by the Regulations

The requirements for public consultation (Regulation 11) and the public meeting (Regulation 12) associated with this DPA will be met.

References/Bibliography

- *Regency & Days Road Proposed Croydon Park Rezoning Area – Summary of Environmental Condition*, AGON Environmental, 28 August 2019
- *Social Infrastructure Report Corner of Days and Regency Road, Croydon Park, Supplement to Development Plan Amendment Report*, URPS October 2019
- *Transport Investigations, Days Road & Regency Road, Croydon Park DPA; CIRQA 13 September 2019*
- *Regency Road DPA Tree Management Plan, Symatree May 2019*
- *Croydon Park Retail Study, Property & Advisory June 2019*
- *Croydon Park Industrial Land Market Study, Property & Advisory June 2019*
- *Corner Days & Regency Roads, Croydon Park DPA Stormwater Assessment, Southfront April 2019*
- *Environmental, Noise Assessment, Corner Days & Regency Roads DPA, Resonate, 20 August 2019*
- South Australian Planning Policy Library Version 6 (September 2011) and related Technical Information Sheets 6, 8, 9
- *The 30-Year Plan for Greater Adelaide 2017 Update (A volume of the South Australian Planning Strategy)*, Department of Planning Transport and Infrastructure 2017
- Port Adelaide Enfield Council Development Plan 6 February 2018
- Charles Sturt Council Development Plan 13 September 2018
- Prospect Council Development Plan 13 February 2018 (no current DPAs have been identified by reference to the council website)

Schedule 4a Certificate

**CERTIFICATION BY COUNCIL'S CHIEF EXECUTIVE OFFICER
DEVELOPMENT REGULATIONS 2008
SCHEDULE 4A**

Development Act 1993 – Section 25 (10) – Certificate - Public Consultation

**CERTIFICATE OF CHIEF EXECUTIVE OFFICER THAT A
DEVELOPMENT PLAN AMENDMENT (DPA) IS SUITABLE FOR THE PURPOSES OF PUBLIC CONSULTATION**

I Mark Withers, as Chief Executive Officer of City of Port Adelaide Enfield, certify that the Statement of Investigations, accompanying this DPA, sets out the extent to which the proposed amendment or amendments-

- (a) accord with the Statement of Intent (as agreed between the Port Adelaide Enfield Council and the Minister under section 25(1) of the Act) and, in particular, all of the items set out in Regulation 9 of the *Development Regulations 2008*; and
- (b) accord with the Planning Strategy, on the basis that each relevant provision of the Planning Strategy that related to the amendment or amendment has been specifically identified and addressed, including by an assessment of the impacts of each policy reflected in the amendment or amendments against the Planning Strategy, and on the basis that any policy which does not fully or in part accord with the Planning Strategy has been specifically identified and an explanation setting out the reason or reasons for the departure from the Planning Strategy has been included in the Statement of Investigation; and
- (c) accord with the other parts of the Development Plan (being those parts not affected by the amendment or amendments); and
- (d) complement the policies in the Development Plans for adjoining areas; and
- (e) satisfy the other matters (if any) prescribed under section 25(10)(e) of the *Development Act 1993*.

The following person or persons have provided advice to the council for the purposes of section 25(4) of the Act:

Andrew Humby, Director, Humby Consulting

Michael Kobas, Urban Planner, City of Port Adelaide Enfield

DATED this 5th day of January 2021



Chief Executive Officer

Appendices

Appendix A - Assessment of the Planning Strategy

Appendix A - Assessment of the Planning Strategy

30 Year Plan for Greater Adelaide (2017 update)	DPA Response
Transit Corridors, growth areas and activity areas	
Policies	
<p>1 Deliver a more compact urban form by locating the majority of Greater Adelaide's urban growth within existing built-up areas by increasing density at strategic locations close to public transport (Map 2.)</p>	<p>The Area Affected is an urban infill site that enjoys reasonable access to public transport. A bus route along Days Road provides half hourly services at peak times and hourly during non-peak, with services along Regency Road (a Go Zone) being more frequent.</p>
<p>2 Increase residential and mixed use development in the walking catchment of:</p> <ul style="list-style-type: none"> ▪ Strategic activity centres * ▪ Appropriate transit corridors ▪ Strategic railway stations <p>* In Inner and Middle Metropolitan Adelaide this could include all activity centres well serviced by frequent public transport</p>	<p>Both bus routes provide access to Arndale Shopping Centre, a District Activity Centre located approximately 1 km by road to the west of the Area Affected.</p> <p>The area represents and opportunity for new residential development within a walking catchment (400m) of Regency Road which is a 'transit corridor' in the form of a Go Zone. A neighbourhood activity centre is envisaged in the area affected. The new residential areas will be within a walking catchment (800m) of shops and public open space (400m). The DPA therefore supports achieving related targets for walkable neighbourhoods.</p>
<p>3 Increase average gross densities of development within activity centres and transit corridor catchments from 15 to 25 dwellings per hectare to 35 dwellings per hectare.</p>	<p>The Suburban Neighbourhood Zone proposed encourages residential development at a range of densities and an average net residential density in the order of 45 to 70 dwellings per hectare.</p>
<p>4 Ensure that the bulk of new residential development in Greater Adelaide is low to medium rise</p>	<p>Low to medium rise development encompasses buildings of between one to six storeys in height. Suburban Neighbourhood Zone policies support building heights within this range.</p>
<p>10 Allow for low-impact employment activities in residential areas, such as small-scale shops, offices and restaurants, where interface issues can be appropriately managed.</p>	<p>Suburban Neighbourhood Zone policies support these activities outside of designated centres, provided they comprise small scale uses that serve the local community.</p>
<p>26 Develop and promote a distinctive and innovative range of building typologies for residential housing which responds to metropolitan Adelaide's changing housing needs, reflects its character and climate, and provides a diversity of price points.</p>	<p>Suburban Neighbourhood Zone policies support these aims.</p>
<p>28 Promote permeable, safe, attractive, accessible and connected movement networks (streets, paths, trails and greenways) in new</p>	<p>While a detailed design matter, the redevelopment of the Area Affected will enable this Policy to be achieved.</p>

30 Year Plan for Greater Adelaide (2017 update)	DPA Response
<i>growth areas and infill redevelopment areas that incorporate green infrastructure.</i>	
29 <i>Encourage development that positively contributes to the public realm by ensuring compatibility with its surrounding context and provides active interfaces with streets and public open spaces.</i>	While a detailed design matter, the redevelopment of the Area Affected will enable this Policy to be achieved.
Housing mix, affordability and competitiveness	
Policies	
36 <i>Increase housing supply near jobs, services and public transport to improve affordability and provide opportunities for people to reduce their transport costs.</i>	As an urban infill site, its redevelopment for residential use in proximity to public transport will enable this Policy to be achieved.
37 <i>Facilitate a diverse range of housing types and tenures (including affordable housing) through increased policy flexibility in residential and mixed-use areas.....</i>	The DPA will facilitate the potential for diversity of dwelling types envisaged in the Suburban Neighbourhood Zone and the potential for Affordable Housing in the zone by identifying the area for rezoning as an Affordable Housing Designated Area.
45 <i>Promote affordable housing in well located areas close to public transport and which offers a housing mix (type and tenure) and quality built form that is well integrated into the community.</i>	The DPA applies the provisions related to Affordable Housing (as defined). There are Affordable Housing Overlay provisions that will apply and no specific amendment to the zone provisions is necessary.
46 <i>Ensure an adequate land supply is available to accommodate housing and employment growth over the longer term (at least a 15 year supply).</i>	The proposed rezoning to Suburban Neighbourhood Zone will assist by providing an additional 6 and a half hectares for housing development (over time). With a further 5 and a half hectares being developed as a shopping centre provide job in construction and operation.
47 <i>Plan future suburbs and regenerate and renew existing ones to be healthy neighbourhoods that include:</i>	The redevelopment of the Area Affected will enable key aims of this Policy to be achieved. In addition, the area is already well serviced with open space provided through the Regency Park oval to the north east and pocket parks to the direct east of the site affected.
> <i>diverse housing options that support affordability</i>	
> <i>access to local shops, community services and facilities</i>	
> <i>safe cycling and pedestrian-friendly streets that are tree-lined for comfort and amenity</i>	
> <i>diverse areas of quality public open space (including local parks, community gardens and playgrounds)</i>	
> <i>sporting and recreation facilities</i>	

30 Year Plan for Greater Adelaide (2017 update)	DPA Response
> walkable connections to public transport and community infrastructure.	
Transport	
Policies	
80 Reduce car parking requirements in mixed-use areas near high frequency public transit services to encourage the use of alternative transport modes.	The DPA will apply off-street car parking requirements under Table PAdE/10 which assigns parking rates to all forms of residential development (and non-residential) in the Suburban Neighbourhood Zone.
Open Space, Sport and Recreation	
Policies	
99 Ensure quality open space is within walking distance of all neighbourhoods to: <ul style="list-style-type: none"> > provide linkages to encourage walking and cycling to local activities, local activity centres and regional centres 	The Area Affected is located near Regency Oval and smaller parks within Croydon Park to the east.
Climate change	
Policies	
105 Deliver a more compact urban form...	The delivery of a compact urban form continues to be an objective of the DPA and the variations across the policy areas within the Suburban Neighbourhood Zone.
107 Increase the proportion of low-rise, medium-density apartments and attached dwellings to support carbon-efficient living	This form of development is envisaged in the Suburban Neighbourhood Zone.
Targets	
Target 1.1: 85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045	The DPA supports the infill development targets of the 30 Year Plan (2017 Update).
Target 2: 60% of all new housing in metropolitan Adelaide is built within close proximity to current and proposed fixed line (rail/tram/O-Bahn) and high frequency bus routes by 2045	Though residential development might not take place directly on Regency Road (unless as upper levels in a mixed use building), the close proximity of housing to Regency Road will take full advantage of the Go Zone on that road.

30 Year Plan for Greater Adelaide (2017 update)	DPA Response
Target 4: Increase the percentage of residents living in walkable neighbourhoods in Inner, Middle and outer Metropolitan Adelaide by 25% by 204	The DPA supports the increase in resident population within walkable neighbourhoods provided that the increase is balanced with other objectives to ensure good building design and urban design outcomes.
Target 5: Urban green cover is increased by 20% in metropolitan Adelaide by 2045.	Implementing the envisaged outcomes of the DPA will likely result in the provision of some public open space and/or new landscaped opens spaces on individual allotments and tree planting in road reserves, thus supporting the desired increase in green cover.
Target 6: Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045	The DPA supports an increase in housing choice and housing diversity. The current DPA will ensure that such choice and diversity can continue to be delivered within the Council's residential areas.

Development Plan Amendment

By the Council

Port Adelaide Enfield Council

Corner of Days & Regency Roads, Croydon Park

The Amendment

For Consultation

Amendment Instructions Table				
Name of Local Government Area:				
City of Port Adelaide Enfield				
Name of Development Plan				
Port Adelaide Enfield Council				
Name of DPA:				
Corner of Days and Regency Roads, Croydon Park				
<p><i>The following amendment instructions (at the time of drafting) relate to the Council Development Plan consolidated on 6 February 2018.</i></p> <p><i>Where amendments to this Development Plan have been authorised after the aforementioned consolidation date, consequential changes to the following amendment instructions will be made as necessary to give effect to this amendment.</i></p>				
Amendment Instruction Number	Method of Change	Detail what in the Development Plan is to be amended, replaced, deleted or inserted.	Is Renumbering required (Y/N)	Subsequent Policy cross-references requiring update (Y/N) if yes please specify.
	<ul style="list-style-type: none"> • Amend • Replace • Delete • Insert 	<p>If applicable, detail what material is to be inserted and where. Use attachments for large bodies of material.</p>		
COUNCIL WIDE / GENERAL SECTION PROVISIONS (including figures and illustrations contained in the text)				
Amendments required (Yes/No): No				
General Section				
		No amendment required		
ZONE AND/OR POLICY AREA AND/OR PRECINCT PROVISIONS (including figures and illustrations contained in the text)				
Amendments required (Yes/No): Yes				
Light Industry Zone				
		No amendment required		
Suburban Neighbourhood Zone				
1.	Insert	Desired Character Statement - insert the contents of Attachment A immediately above the section heading <i>Form and Character</i>	No	No

2.	Insert	Desired Character Statement - insert the contents of Attachment B as the last paragraph under the section heading <i>Housing</i>	No	No
3.	Insert	Replace the first paragraph with the content of Attachment C		
4.	Insert	Desired Character Statement - insert the contents of Attachment D in the section on <i>Activity Centres and Non-Residential Uses</i> immediately above the sub-heading <i>Local Activity Centre – Envisaged Uses</i>	No	No
5.	Insert	Desired Character Statement - insert the contents of Attachment E as the last paragraph under the sub-heading <i>Access</i>	No	No
6.	Insert	Desired Character Statement - insert the contents of Attachment F as the last paragraph under the sub-heading <i>Open Space</i> .	No	No
7.	Amend	Desired Character Statement – Amend the heading Site Contamination – Northfield by adding the words “ and Croydon Park ”	No	No
8.	Insert	New Principle of development control 4 with Attachment G	Yes	No
MAPPING (Structure Plans, Overlays, Enlargements, Zone Maps, Policy Area & Precinct Maps)				
Amendments required (Yes/No): Yes				
Map Reference Table				
9.	Insert	Zone Maps table under Suburban Neighbourhood Centre Zone – insert reference to PAdE/35	No	No
10.	Insert	Overlay Maps table under type ‘Affordable Housing’ – insert reference to PAdE/35	No	No
11.	Insert	Overlay Maps table under type ‘Noise and Air Emissions’ Affordable Housing – insert reference to PAdE/35	No	No
Map(s)				
12.	Replace	The following maps with the corresponding Map in Attachment H Council Index Map Zone Map PAdE/35	No	No
13.	Insert	Attachment I – new overlays after the Overlay Map PAdE/35 - Heritage Overlay Map PAdE/35 - Affordable Housing Overlay Map PAdE/35 - Noise and Air Emissions	No	No

ATTACHMENT A (amendments to SNZ Desired Character)

The area of the zone within Croydon Park represents a unique opportunity to facilitate the redevelopment of the area with neighbourhood activity centre facilities combined with residential development at low to medium densities.

Development adjacent a boundary of a zone for residential development, will generally not exceed two storeys, and will comprise primarily residential buildings at the interface.

Development will improve connections to established residential areas to the west and south and the adjacent road network through a new internal movement network.

ATTACHMENT B (amendments to SNZ Desired Character-*Housing*)

New development in Croydon Park will provide a range of dwelling types including detached, semi-detached, row and group dwellings and residential flat buildings over an area of at least 10 hectares. The highest residential densities (other than in mixed use medium-rise buildings) will be in the central third of the area, south of neighbourhood activity centre activities which will form the primary land use fronting Regency Road which is the main source of noise emissions.

New residential development in Croydon Park will need to consider existing noise sources from established non-residential uses that may continue to operate while the area is developed in stages. Noise sensitive development will also need to be sited and constructed in a manner that has regard to the potential for new non-residential noise sources envisaged in the northern third of the area.

ATTACHMENT C (amendments to SNZ Desired Character-Activity Centres and Non-Residential Development)

Activity Centres and Non-Residential Uses

A neighbourhood activity centre and four local activity centres are envisaged within the zone in Northgate in accordance with [Concept Plan Map PAde/47 – Northgate Land Use and Access](#) and [Concept Plan Map PAde/21 – Northgate Neighbourhood Activity Centre](#).

A neighbourhood activity centre is also envisaged within the zone in accordance with [Concept Plan Map PAde/51 – Northfield Land Use and Access](#) and in Croydon Park, where its primary frontage presents to Regency Road.

These activity centres will provide the greatest intensity of land use and will generally comprise multi-storey, mixed use buildings where the street level uses are primarily non-residential. Upper floor land uses will primarily be residential with some complementary non-residential uses such as offices or consulting rooms.

ATTACHMENT D (amendments to SNZ Desired Character-Activity Centres and Non-Residential Development)

Neighbourhood Activity Centre - Croydon Park

Non-residential uses will primarily be established adjacent the Regency Road frontage, with up to 5,500 square metres of retail floor area anticipated for neighbourhood activity centre development.

Local business and other non-retail commercial activities are envisaged adjacent to Days Road but will be limited to approximately 150 metres of that frontage.

Non-residential uses will primarily consist of mixed uses in the form of ground floor retail and local businesses (eg hairdresser, pharmacy, newsagent, office) gym, child care and may include a full line supermarket.

Shared parking areas will service all non-residential land uses in a neighbourhood activity centre.

The neighbourhood activity centre will include landscaping comprising of canopy trees, selected to complement (at maturity) the scale and height of envisaged buildings, providing an attractive public realm along Regency Road, Days Road and new internal road frontages. This element may be integrated with public open space at the interface of the centre and envisaged residential areas to the south, serving as a landscaped buffer between the neighbourhood activity centre uses (or in the interim, act as a buffer to existing industrial uses) and new residential areas.

ATTACHMENT E (amendments to SNZ Desired Character-Access)

Access - Croydon Park

Up to three primary intersections are envisaged to service the majority of the area.

On Regency Road, one collector road into the area will be the one only priority controlled T-intersection on that road frontage. Development, where practical, should result in the consolidation of the number of individual crossovers on Regency Road.

The large extent of frontage of the area to Days Road can accommodate up to two new public road intersections to service the area (in addition to the primary Regency Road intersection). Collector roads within the area will form the priority controlled T-intersection(s) with Days Road.

There will be no new direct vehicular access points to Days Road from individual non-residential uses or allotments created through land division for non-residential purposes as part of developing a neighbourhood activity centre .

Existing local business and other uses on smaller allotments fronting Days Road could be operational for an extended period, but where practical over time, individual crossovers to existing allotments will be rationalised through allotment consolidation as part of a comprehensive redevelopment scheme.

Desirably, each principal access point (new public road connection) will include a separate right turn lane, and if provided, the design makes provision for two-stage right out movements through a new median opening in Days Road or Regency Road, whichever is applicable.

Any new or modified intersection or crossover will need to ensure adequate separation from other intersections including those associated with the zone and those on the opposite side of Regency Road /Days Road. Development should not negatively impact on the potential need for an upgrade of the Regency/Days Road intersection if required subject to staging and demand generated by development in the zone. The need for improvements to the existing Regency Road /Days Road intersection will be subject to future consideration of forecast yields within the zone and detailed analysis will be considered at the detailed design of individual stages of development.

New local no-through roads will have a more intimate feel and support walking and cycling with lower traffic volumes and speeds. Residential streets with a low traffic volume on the future internal road network are anticipated and conducive to shared use by cyclists. New public road connections with Regency Road and Days Road will include direct connections at the intersection(s) to facilitate safe access to the existing bicycle lanes. Pedestrian links (east-west and north-south) are encouraged to optimize connectivity to the existing footpath network, bus stops and recreation facilities in the wider neighbourhood.

ATTACHMENT F (amendments to SNZ Desired Character-*Open Space*)

Open Space - Croydon Park

The southern half of the area is within 400 metres walking distance to established open space in Croydon Park on the west side of Days Road. The open space will primarily serve the community in this local area of the zone. An open space area will be located within a reasonable walking distance of approximately 300 metres of all residences and will be designed to a high standard of quality, safety and amenity.

Noting the area's proximity to a range of active and recreational open space in the wider neighbourhood such as Regency Park Oval and Regency Park Golf Course, the provision of new reserves for public open space will primarily be for passive use, play and social activity.

Large trees within the area, including along the Regency Road frontage, provide amenity value and should be considered for retention in public open space or within landscape reserves within development sites or road reserves.

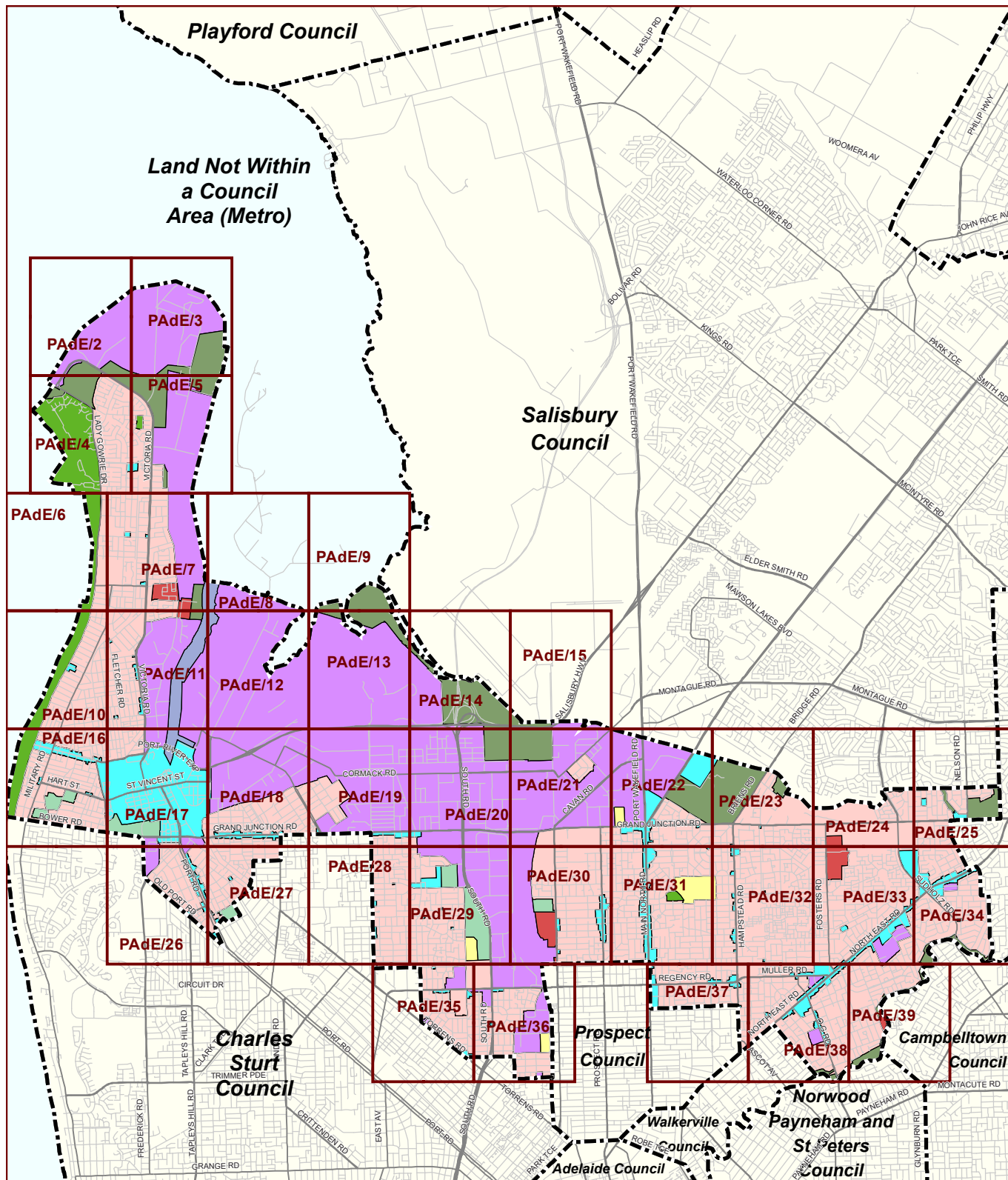
Attachment G (amendments to SNZ principles of development control)

- 4 The following additional types of development, or combination thereof, are envisaged in a Neighbourhood Activity Centre in Croydon Park:
- advertisement
 - bulky goods outlet
 - child care centre
 - consulting room
 - gym / fitness centre
 - hotel
 - petrol filling station

ATTACHMENT H Replacement Maps

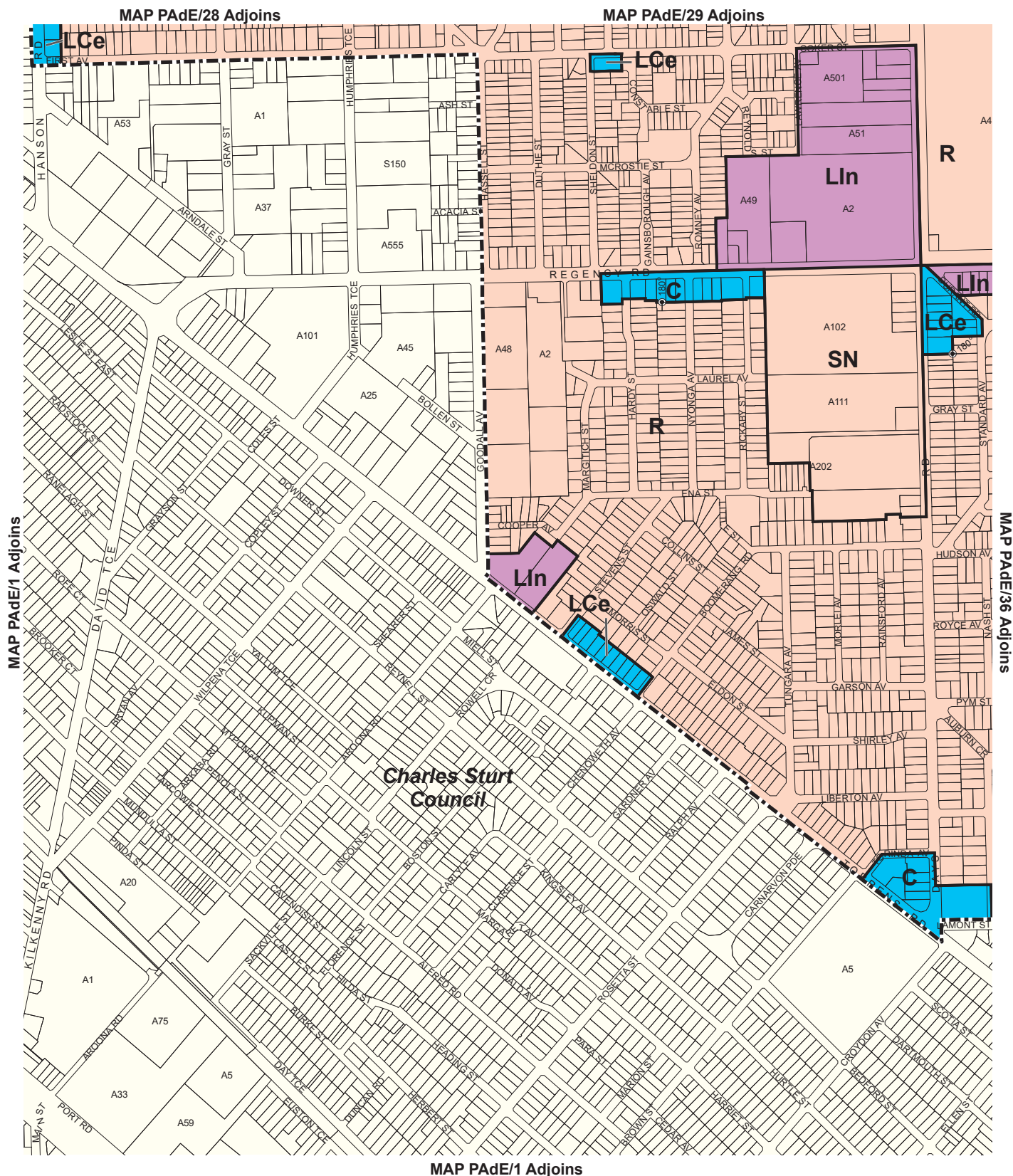
Council Index Map

Zone Map PAdE/35



For the purposes of the Development Plan unless otherwise clearly indicated, the zone/policy area/precinct boundaries depicted on or intended to be fixed by Maps PAde/1 to Map PAde/41 inclusive shall be read as conforming in all respects (as the case may require) to the land division boundaries, to the centre line of roads or drain reserves or to the title boundaries, or to imaginary straight lines joining the positions defined by survey or by the measurements shown on the said maps against which the said zone/policy area/precinct boundaries are shown or otherwise indicated.

Council Index Map



Lamberts Conformal Conic Projection, GDA94



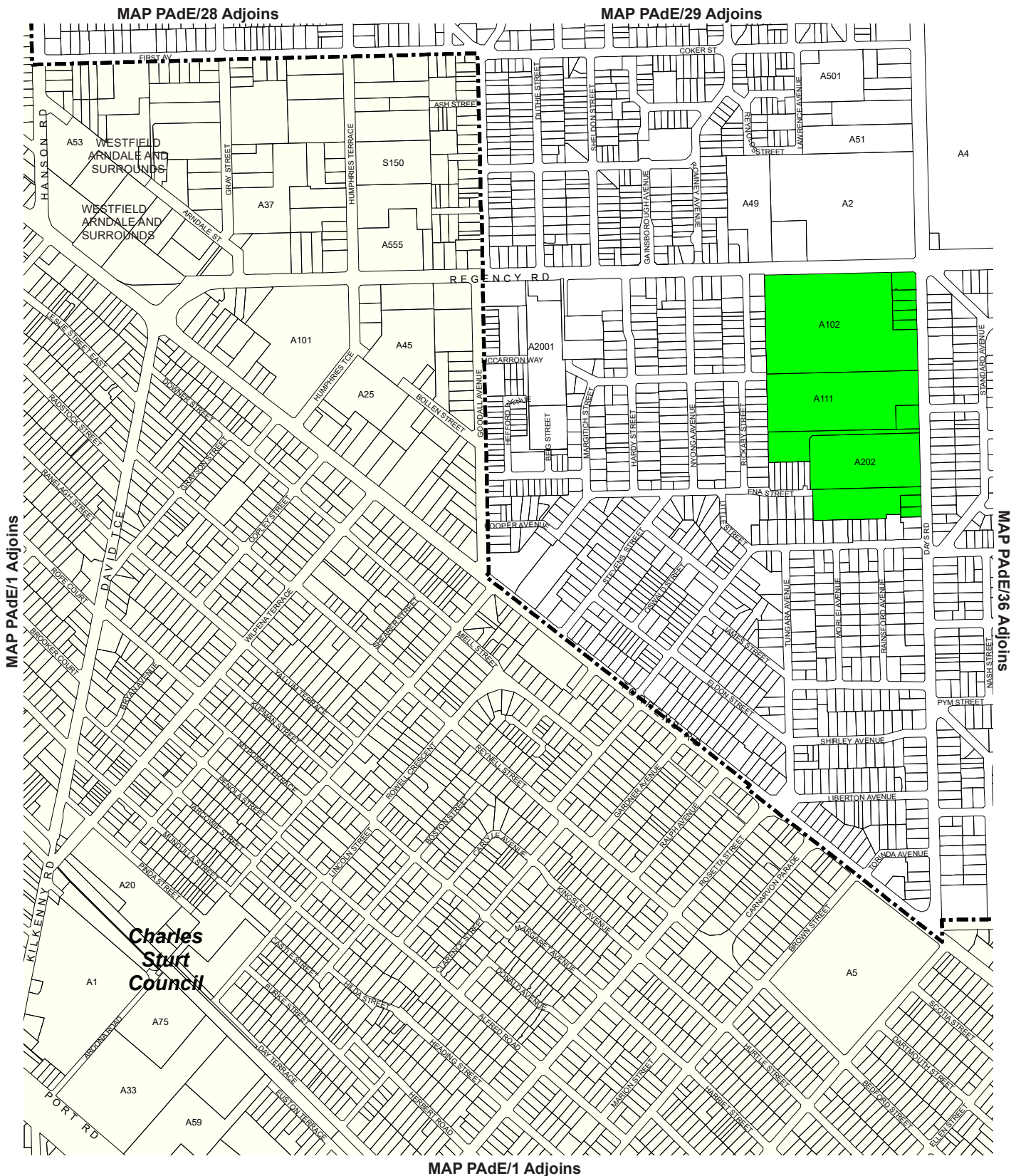
- Zones**
- C** Commercial
 - LIn** Light Industry
 - LCe** Local Centre
 - R** Residential
 - SN** Suburban Neighbourhood
 - Zone Boundary
 - Development Plan Boundary

Zone Map PAdE/35

PORT ADELAIDE ENFIELD COUNCIL

ATTACHMENT I new overlays

Overlay Map PAdE/35 - Affordable Housing
Overlay Map PAdE/35 - Noise and Air Emissions



Lamberts Conformal Conic Projection, GDA94

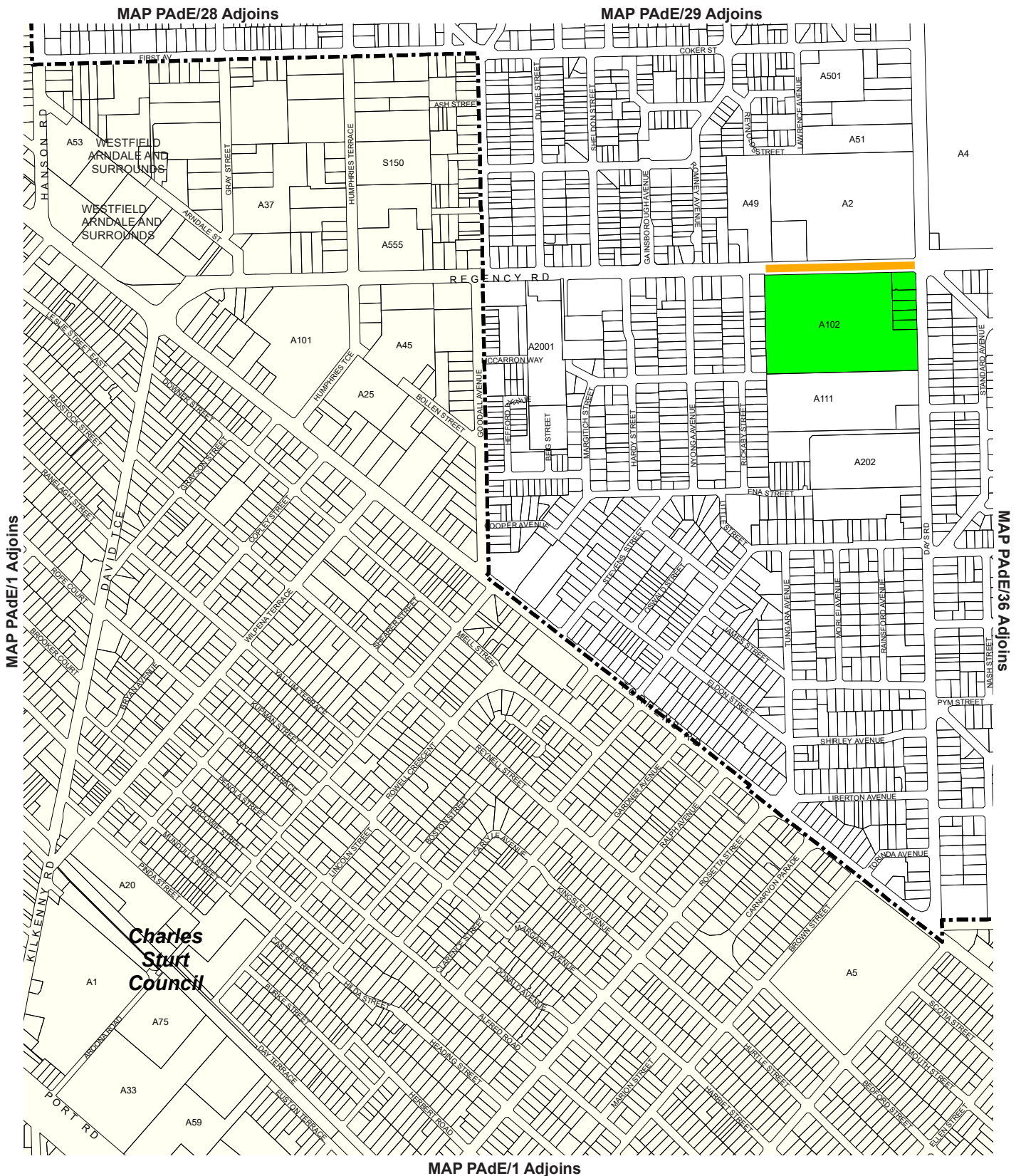


Overlay Map PAdE/35

AFFORDABLE HOUSING

PORT ADELAIDE ENFIELD COUNCIL

- Affordable Housing Designated Area
- Development Plan Boundary



Lamberts Conformal Conic Projection, GDA94



Overlay Map PAdE/35 NOISE AND AIR EMISSIONS

PORT ADELAIDE ENFIELD COUNCIL

- Designated Road: Type B
- Noise and Air Emissions Designated Area
- Development Plan Boundary