

72 Woodville Road, Woodville
South Australia 5011
PO Box 1, Woodville SA 5011

T 08 8408 1111
F 08 8408 1122
charlessturt.sa.gov.au



25 February 2020

Michael Lennon
Chair
State Planning Commission
Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Mr Lennon,

State Planning Commission's Draft Planning and Design Code – Phase 3 - for Consultation

Council wishes to thank the State Planning Commission for the opportunity to comment on the draft Planning and Design Code (draft Code) for Phase 3, which affects all councils located in metropolitan Adelaide.

It is acknowledged that the draft Code will serve as the State's planning assessment guide, replacing all existing Development Plan's in South Australia. It is therefore important to ensure that a level of consistency is maintained between planning policy within existing Development Plans through the transition into the draft Code.

While Council is aware of the Commission's legislative timeframes to roll-out its planning reforms the release of the draft Code for consultation in October 2019 has shown there are still a high number of matters that require further attention. A key issue is the sheer complexity in navigating through the draft Code including its associated assessment pathways and policies and making sure this is complete and consistent.

Council considers there is still considerable work required to be done prior to the implementation of the draft Code. Council supports the Minister's recent announcement that the implementation date will now be extended from July to September 2020. However, it is considered appropriate that given the volume of work needed by the Commission to review submissions and liaise with stakeholders (including Charles Sturt) on subsequent amendments to the draft Code (post consultation), the time frame to implement the new planning system may warrant further delay. A delay in the implementation of the draft Code will afford the Commission greater time to meet with Council (post consultation) to address the matters raised in the submission and time for Council to review the Commission's revised draft Code before it is initiated.

The City of Charles Sturt has taken the opportunity to consider the draft Code. It is acknowledged that the Commission's Transition Manager has been liaising with Council staff during the consultation process. Through this process several issues have been identified and are being considered by the Commission. These matters are included as part of Council's full submission. While a copy of Council's specific comments is provided in the attached document



(refer to **Appendix A**) several key issues identified for the City of Charles Sturt are worthy of specific mention below:

General Neighbourhood Zone

The draft Code proposes row dwellings with a reduced site area to what is currently envisaged in the Charles Sturt Council Residential Zone, within the existing Mid-Suburban Policy Area R16, Western Edge Policy Area 17 and West Lakes Policy Area 18. The greatest inconsistency is identified for Policy Areas 17 and 18. This is considered a significant policy shift that warrants further consideration. It is recommended that the minimum site area proposed for row dwellings in the General Neighbourhood Zone be increased to a minimum of 250 square metres to improve consistency with current policy.

Housing Diversity Zone – Implications for Residential Zone Policy Area 15

The draft Code proposes a Housing Diversity Zone over several existing policy areas within the Residential Zone and in particular the Inner Suburban Policy Area 15. The proposed zone refers to a net residential development of up to 70 dwellings per hectare. This equate to 143m² average site area per dwelling. Currently Policy Areas 15 and 19 specifically refers to up to 40 dwellings/hectare, as well as site area requirements of between 220m² (group, RFB and row dwellings) and 250m² (detached and semi-detached). There is no reference to minimum frontage requirements for different dwelling types. The proposed policy is considered too much of a variation from the intent of the current policy and amendments should be made to the draft Code to address this inconsistency either by allowing technical and numerical variation to the site areas or applying a zone that more aligns with the current intended density.

Car parking requirements

Infill development has steadily grown in Charles Sturt. A key issue for Council that is experienced by its residents in established areas involves an increase of on-street parking. Through infill development, smaller allotments are created, reducing opportunities for off-street parking. The current policy in the Charles Sturt Development Plan seeks two on site car parking spaces, one of which is covered (the second space can be tandem). The proposed policy is considered too much of a variation from the intent of the current policy and amendments should be made to ensure two spaces are provided on-site for detached and semi-detached dwellings, regardless of the number of bedrooms.

District Centre Zone – Woodville Policy Area 5, Precinct 20 Civic

The draft Code proposes a transition of this Precinct into a Community Facilities Zone. The Desired Outcome for this zone seeks a range of public and private community, educational, recreational and health care facilities. While this Precinct is home to the Charles Sturt Council Civic Centre there are also several commercial land uses that are more akin to a centre zone. The proposed Zone is not considered consistent with the intent of this Precinct. The Suburban Activity Centre Zone should be considered instead which envisages a broader range of land uses consistent with the current District Centre Zone.

Off-street car parking is also not consistent with current Development Plan Table ChSt/2A as a Community Facilities Zone is not proposed as a designated area. This is contrary to the current policy that applies.

Hazards (Flooding) Overlay

The draft Code proposes a Hazards (Flooding) Overlay with associated policy to trigger a more rigorous assessment to address potential flooding issues. The draft Code has provided this Overlay only to council areas in the State that already have flood mapping contained in their respective Development Plans.

While the Charles Sturt Council Development Plan does not contain flood mapping, the City does have flood mapping that is up to date and is publicly available. Together with current Development Plan policy the flood mapping information assists the assessment of development applications to initiate further investigations and/or requirements by an applicant to ensure suitable design measures are made during the assessment process.

The absence of the Overlay and its policies for the City of Charles Sturt will mean the City will lose a key policy trigger to determine the stormwater management outcome for a development and call upon the current flood mapping information to make an informed assessment.

It is strongly recommended the proposed Hazards (Flooding) Overlay be applied across the State and for the City of Charles Sturt, which already has relevant flood mapping that is publicly available to ensure a more rigorous assessment process. Through the release of the Commission's Planning and Design Code Phase Three Urban Area Update Report released on 23 December 2019, it is acknowledged that the Commission intends to address this issue and include flood hazard mapping and data within an overlay in the Code where this information is provided by councils. Council is happy to work with the Commission and provide its current flood mapping information to assist this process.

Appendix A provides further technical comments on the proposed stormwater and flooding policies contained in the draft Code in relation to this Council.

Housing Renewal Policy

The draft Code proposes separate assessment pathways (under Deemed to Satisfy or Performance Assessed development) for housing developed by the South Australian Housing Trust (SAHT) either individually or jointly with other community housing providers or a registered Community Housing provider. These assessment pathways propose to bypass all other zone and general provisions (eg. building heights, site area requirements and environmental performance (see heading below)). To ensure a level of consistency in built form within a zone the assessment pathways for dwellings developed by the SAHT and/or other similar housing providers should include assessment against the relevant zone provisions.

Environmental Performance

Draft policies that seek to address energy efficiency and climate responsive buildings are strongly supported in the draft Code with amendments. However, within the assessment

pathways these policies only apply to a limited number of dwelling types (detached dwelling (battle-axe), group dwelling and residential flat building) but are not captured in the assessment of detached dwellings, semi-detached, row dwellings or dwellings being developed by the SAHT either individually or jointly with other community housing providers, or a registered Community Housing provider.

For future housing to respond to climate change impacts, improve amenity and well-being of occupants, the application of environmental performance policies should be expanded to include all dwelling types. Proposed policies contained within 'Design in Urban Areas' in relation to landscaping, water sensitive design and environmental performance should apply to all dwellings to provide a higher level of environmental protection for future residents. The specific policies are identified in **Appendix A** for the Commission's consideration.

Performance Assessed Pathways

A performance assessed development requires consideration on merit against all relevant provisions in the draft Code. The performance assessed tables only identify specific policies from the zone or general policies that the Commission has deemed relevant to assess against individual development types. By not incorporating all policies contained in either the zone or general policies in a performance assessment this presents an issue that critical policy may be missed in the assessment process. As an example, under the General Neighbourhood Zone, Performance Assessed Pathway for a detached dwelling policy proposed for façade design PO 8.1 is not captured in the assessment process.

The draft Code also proposes a suite of general development policies that assist in the design assessment of development. However, in many cases relevant policies are not called in for the performance assessment or deemed to satisfy pathway for a development. As an example, all policies under Transport, Access and Parking that relate to general vehicle movements, sightlines, widths, impacts on infrastructure should apply to all dwellings in the assessment pathways. At present these policies are not called in for detached, semi-detached or row dwellings.

Given the difficulty of accurately capturing all relevant policy for specific development, it is recommended that the Commission either capture all zone and general policy for performance assessed development or policies be better grouped into general policies that could apply to all development, general policies that could apply to multi tenanted 'shared use' facilities and commercial/industrial types of development so policies are able to be used in the assessment where needed. This will ensure a more rigorous assessment process utilising important policy design outcomes. We believe this is critical to the success of the draft Code because if it becomes operational without enough policy rigour there will be poor built form outcomes and community dissatisfaction.

In addition to the issue of not calling in required policy for assessment these tables also incorrectly refer to Deemed to Satisfy provisions in the zone section of the Performance Assessed tables rather than the performance outcome which is the overarching policy that should be assessed against. This needs to be corrected prior to the Planning and Design Code coming into effect or it will limit the level of policy that can be considered.

Historic Area Statements

It is acknowledged and commended that the Commission has listened to feedback and has incorporated into the draft Code Historic Area Statements (HAS) within the proposed Historic Area Overlays (all land currently contained in the City's Historic Conservation Areas) for the Phase of the draft Code. The inclusion of HAS will provide additional policy support in areas contained within the Historic Area Overlays by identifying and articulating key elements of local importance.

A full copy of Council proposed HAS are contained in **Appendix A** for inclusion into the draft Code. These were previously provided to the Commission but have now been updated. The HAS have been developed based on existing policy contained in the Charles Sturt Council Development Plan and through the advice of Council's Heritage Adviser.

Public notification

The procedural matters identified within the draft Code require public notification that in its current form potentially creates greater notification and more reporting to the Council Assessment Panels. The Commission's Planning and Design Code Phase Three Urban Area Update Report released on 23 December 2019, has acknowledged issues with the notification processes and proposes to consider changes including the listing of specific classes of development that are excluded from notification, instead of excluding all development and listing exceptions.

Simplification of this process is supported to ensure excessive numbers of development are not notified e.g. a domestic garage to the rear of a site. However, there are concerns that the procedural tables in the zones are not specifically called in through the assessment pathway classification tables, nor are they mentioned in the opening rules of interpretation in the draft Code and may not therefore have a role to play in the assessment process because of this. It is recommended that the Applicable policies section in each zone specifies that the procedural matters apply.

Public Open Space requirements

The Desired Character Statement for the District Centre Zone – Woodville Policy Area 5 – Railway Station Precinct 21 envisages 22% for public open space. Similarly, the Desired Character Statement for the Urban Core Zone, West Lakes also seeks 15% for public open space. Both these locations seek mixed use development including higher density residential land uses hence the need to maintain and reflect the higher percentage of public open space in these locations beyond the existing statutory requirements of 12.5%.

Technical Numerical Variations

The spatial application of the draft Code has inconsistencies with the required building height in metres and storeys, which needs to be addressed prior to its implementation. As an example, there are clear inconsistencies in the Bowden development area as well as the recently rezoned area as part of the Bowden Brompton Mixed Use DPA.

As the State's largest planning reforms to occur since the Development Act 1993 was established, Council seeks the best possible outcomes for its community through the Planning and Design Code implementation process.

The comments provided in the submission are intended to address several matters currently identified in the draft Code. Council will continue to review the State Planning Reforms and provide further feedback as the effects of the reforms become fully realised.

I look forward to the Commission's response on how these issues will be addressed.

Please don't hesitate to contact Jim Gronthos on 8408 1265 should you wish to discuss this matter in further detail.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Angela Evans', with a stylized flourish at the end.

Angela Evans
Mayor

Appendix A

COUNCIL SUBMISSION ON THE STATE PLANNING COMMISSION DRAFT PLANNING AND DESIGN CODE (PHASE 3 URBAN AREAS), FEBRUARY 2020

PART 1 – RULES OF INTERPRETATION		
No.	Draft Code Reference	Comments
1.	Page 11 under the heading 'Preliminary'	<ul style="list-style-type: none"> 'Library of classification criteria (Deemed-to-Satisfy criteria), policies and rules' – this is an incomplete sentence.
2.	Page 12 under the heading 'Performance Assessed'	<ul style="list-style-type: none"> The performance assessed section is not formatted as a heading like the other forms of development and is not obvious to the reader. This section of the draft Code seems to be missing any reference to the procedural matters for notification and when these would be applicable. The tables do not call in the Zone procedural matters to determine when they would be applicable.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
3.	Adelaide Shores Zone	Recreation Zone	<ul style="list-style-type: none"> The Recreation Zone Desired Outcome should be expanded to reference short-term accommodation. The City of Charles Sturt has an existing caravan park in the proposed zone with associated facilities, sporting, entertainment, cultural as well as recreational activities. Currently Category 2 notification occurs for all forms of development located less than 60 metres from a Residential Zone. The proposed zone emphasises 'adjacent to' (different interpretation under the PDI Act (60m means potentially greater number of properties to be notified). Table 1 Accepted development: <ul style="list-style-type: none"> Accepted criteria for a carport and other structures – encroachment over a sewerage system – why shouldn't the encroachment apply to all easements eg. stormwater, electricity, etc? Criteria 13, part b) and c), unlikely that applications for a carport will provide that level of detail to be assessed as accepted development.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> The criteria numbering for the classes of development does not flow. Table 2 Deemed to Satisfy development: <ul style="list-style-type: none"> Advertisement is not considered Deemed to Satisfy (DTS) if located near an area within a Signalised Intersection Overlay but then the Overlay also forms part of the assessment criteria? Table 3 Performance Assessed Development: <ul style="list-style-type: none"> Advertisement, criteria-Building Near Airfields Overlay PO 1.2 – ‘Development likely to attract birds adequately separated from airfields to minimise the potential for aircraft bird strike.’ – Question: would advertisement proposals attract birds? Referral under the Airport Building Heights (Regulated) Overlay – ‘Development of a building height which would exceed the Obstacle Limitation Surface.’ – Question: cannot find in the draft Code these figures? DTS 1.1 refers to Technical and Numeric Variation Overlay but the information is not there? Confirmed that the Airports Building Heights (Regulated) of 15m is consistent with current Development Plan Overlay Map Development Constraints Map ChSt/23. Consider the following additional Overlays for the Zone: <ul style="list-style-type: none"> Hazards (Flooding) Overlay – as there is evidence of localised flooding. Noise and Air Emissions Overlay – as the zone is a mixed-use environment. Urban Transport Routes Overlay – given its location to Military Road. Aircraft Noise Exposure Overlay – given its location to the Adelaide Airport.
4.	Airfield Zone	Commonwealth Facility Zone	<ul style="list-style-type: none"> CCS DP includes an Airfield Zone located at the southern end of our local government boundary. Currently a golf course (AFFECTS 3.3HA OF LAND) Agree with no DTS development in this zone. Development should be performance assessed (merit-based assessment) because of the nature of this Zone which serves to promote aviation operations. Preference to see building height limitations placed on the Overlay Maps.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> Recommend inclusion of current PDC 4 under the General Section of the Development Plan, Building near Airfields, which seeks to avoid development near airfields that may create a risk to public safety. Under Procedural Matters, adjacent land definition will require greater number of properties to be notified. Consider the following additional Overlays for the Zone: <ul style="list-style-type: none"> Hazards (Flooding) Overlay – as there is evidence of localised flooding. Aircraft Noise Exposure Overlay – given its location.
5.	Coastal Open Space Zone	Open Space Zone	<ul style="list-style-type: none"> The policy is silent on short term tourist accommodation. The Coastal Open Space Zone currently contains the Fort Glanville Precinct which includes caravan park and Fort Glanville. The Desired Outcome requires further details to emphasise conservation, public accessibility, development for public purposes. PO 3.1 – should reference ‘public’ before open space. There is no restricted development. This requires further consideration, such as the potential exclusion of dwellings, hotels, industry, offices consistent with the existing zone provisions. Consider the following additional Overlays for the Zone: <ul style="list-style-type: none"> Local Heritage Places Overlay required for the Grange and Henley Beach Jetties. State Heritage Places Overlay for the Fort Glanville site.
6.	District Centre Zone	Suburban Activity Centre Zone	<ul style="list-style-type: none"> Proposed zone module considered to align with the Precinct. As a general observation for all existing centre zones in the City proposed in the Suburban Activity Centre Zone, there are no numerical variation tables applied to this in mapping under Technical and Numeric Variation Overlay (TNV) but the zone refers to one in PO 3.1 DTS 3.1. The draft Code requires a data overlay to limit heights to ensure consistency with current Development Plan policy. The building height difference (current policy typically in the District Centre Zone is 12m/3 storeys versus the proposed policy of low rise (up to two building levels) to medium rise (3 to 6 building levels) with highest intensity at the centre of the zone.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> • Restricted development is industry – which is currently non-complying. • Consider further land uses as restricted such as warehouse, waste reception, storage, treatment or disposal, fuel depot, road transport terminal consistent with the current zone provisions. • Proposed notification likely to increase level of notifiable development. • Existing Concept Plan Map ChSt/1 for the Fulham Gardens Policy Area 1 not required to carry through. The desired policy is already addressed on site eg. access points, landscaping, and pedestrian linkages. The draft Code contains policy in the proposed zone addressing landscaping, pedestrian linkages, access and sharing car parking to assess future development proposals. • For Fulham Gardens Policy Area 1/ Commercial Fringe Fulham Gardens – Precinct 3 the current 250m2 cap other than bulky goods and restaurants will not apply in the draft Code. This is not considered a significant issue given the objective of the zone. • District Centre Zone – Hindmarsh Policy Area 2 – Historic Hub Precinct 5 – requires an Historic Area Overlay, Local Heritage Place Overlay and State Heritage Place Overlay consistent with existing policy. See further below for recommended draft Historic Area Statement. • District Centre Zone – Hindmarsh Policy Area 2 – Port Road Office Precinct 6 – requires a Local Heritage Place Overlay • District Centre Zone – Hindmarsh Policy Area 2 – Port Road Office Precinct 6 – Current Development Plan policy discourages residential development north of Port Road and west of Anne Street. This is an area which abuts an Urban Employment Zone. Policy to discourage residential land uses considered to be required as currently applied in the Development Plan. • District Centre Zone – Hindmarsh Policy Area 2 – Manton Street Precinct 7 – requires a Local Heritage Place Overlay • District Centre Zone – Hindmarsh Policy Area 2 – Gateway Precinct 8 – The entertainment centre, Channel 7 and decked car parking exists here. Policy to prevent residential land uses considered to be required as currently applied in the Development Plan.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> District Centre Zone – Hindmarsh Policy Area 2 – Port Road Gardens Precinct 10 – requires a Local Heritage Place Overlay and State Heritage Place Overlay.
7.	District Centre Zone – Fulham Gardens Policy Area 1- Recreation Fulham Gardens Precinct 4	Community Facilities Zone	<ul style="list-style-type: none"> This precinct contains a Function Centre and a consulting room land use, which are considered a better fit within a centre zone. The Desired Outcome for the proposed Community Facilities Zone envisages a public community centre, library, community garden etc. It is recommended that the Recreation Fulham Gardens Precinct 4 contained within the current District Centre Zone be transitioned into the Suburban Activity Centre consistent with the balance of the existing centre.
8.	District Centre Zone – Kilkenny Policy Area 3 – Retail Core Kilkenny Precinct 11	Urban Activity Centre Zone	<ul style="list-style-type: none"> Agree with the proposed transition zone as this is considered a higher order centre. Existing policy contained in the Desired Character Statement is not required to carry over. The Desired Outcome in the module addresses what its focus is, integration and accessibility for pedestrians, cyclists and public transport. It is recommended that additional policy be included to address interface treatments and noise attenuation measures consistent with policy contained in the existing Desired Character Statement.
9.	District Centre Zone – Kilkenny Policy Area 3 – Residential Precinct 15	Urban Neighbourhood Zone	<ul style="list-style-type: none"> Agree with the proposed transition zone as this precinct comprises medium density housing, specifically desired in the Desired Character Statement in the existing zone. Current Building height policy 13.5m consistent with TNV on the draft Code spatial layer.
10.	District Centre Zone – West Lakes Policy Area 4 – Retail Core West Lakes Precinct 16	Urban Activity Centre	<ul style="list-style-type: none"> Agree with the proposed transition zone as this is considered a higher order centre. Current Desired Character Statement does not envisage residential development. It is noted that the proposed zone will facilitate future residential development. Council supports this proposed policy shift. In August 2019, Council submitted a draft Statement of Intent (SOI) to initiate a Development Plan Amendment (DPA) to investigate policy amendments to remove the non-complying trigger for residential land uses in the existing District Centre Zone, West Lakes Policy Area – Precinct 16 - Retail Core. The DPA never proceeded as the Minister did not support the SOI

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			outlining that the current Zone was proposed to be transitioned into the Urban Activity Centre Zone under the draft version of the Code, which envisaged residential land uses.
11.	District Centre Zone – West Lakes Policy Area 4 – Lakefront Precinct 17	Urban Activity Centre	<ul style="list-style-type: none"> • There is specific policy in the precinct which seeks 6 storeys (21m) south of 141-143 Brebner Drive and 4 storeys (15m) north of 141-143 Brebner Drive. This should be reflected in the TNV, given the proposed zone envisages medium rise (3 to 6 storeys). • The proposed zone transition is consistent with current Zone DCS seeking medium to high rise residential development. • Precinct has specific policy seeking architectural form, improve interface with public realm, and linkages with retail core (precinct 15). How does the draft Code propose to carry this desired policy over? • Precinct also has specific policy not encouraging fencing to the Lake frontage. How does the draft Code proposed to carry this desired policy over? • Precinct has a specific policy seeking under-croft parking that does not project above finished ground level by more than 750mm. The draft Code DTS 6.1, Transport, Access and Parking, Car parking appearance seeks a maximum 1.2m.
12.	District Centre Zone – Woodville Policy Area 5 – Woodville Road Medical Precinct 18	Community Facilities Zone	<ul style="list-style-type: none"> • This precinct involves the Health Precinct with the Queen Elizabeth Hospital. The Precinct envisages hospital facilities, ancillary health facilities, consulting rooms, aged care accommodation and community facilities. • The proposed transition zone is considered consistent with the current zone seeking a range of public/private, community, educational, recreational and health care land uses. • The Precinct envisages development scaling down in intensity towards the boundaries of the precinct interface. The proposed Zone seeks a transition of built form from the centre to the interface. • The proposed zone envisages low to medium rise buildings. This will require a data overlay to limit heights to ensure consistency with current Development Plan policy (building height

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p>difference (west of Woodville Road – maximum 12m and east of Woodville Road – maximum 18m).</p> <ul style="list-style-type: none"> The proposed zone contains building envelope to address interface for bulk / scale and overshadowing on southern sides. Consider the following additional Overlays for the Zone: <ul style="list-style-type: none"> Local Heritage Places Overlay given the presence of Local Heritage Places.
13.	District Centre Zone – Woodville Policy Area 5 – Woodville Road Gardens Precinct 19	Open Space Zone	<ul style="list-style-type: none"> The existing Precinct is in road reserve on Port Road and the current District Centre Zone is considered not required. The section of Port Road adjacent to this Precinct (north -west and south – east) is currently located in the Special Uses Zone and is proposed to be transitioned in the Open Space Zone. The envisaged land uses in the existing Precinct is consistent with the proposed zone. The proposed zone silent on building height and does not refer to the TNV. Building heights should be specified in this zone and be consistent with the current policy contained in the Development Plan.
14.	District Centre Zone – Woodville Policy Area 5 – Civic Precinct 20	Community Facilities Zone	<ul style="list-style-type: none"> The proposed Zone is not considered consistent with the intent of this Precinct. The Suburban Activity Centre Zone should be considered instead which envisages a broader range of land uses consistent with the current District Centre Zone. While the current Concept Plan Map ChSt/5 is not considered relevant, the following should be included as policy within the zone: <ul style="list-style-type: none"> Landscape buffer where zone interfaces with residential zones Major township focus on the Woodville Road/Port Road corner. Policy to seek buildings on arterial road corners of a substantial size and bulk with minimal setbacks. Policy that desires higher density residential development and shop top housing consistent with existing policy.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> Off-street car parking is not consistent with current Development Plan Table ChSt/2A as a Community Facilities Zone is not proposed as a designated area. This is contrary to the current policy that applies. No restricted development proposed in the Zone. Currently in the DCZ for Precinct 20 key land uses such as industry, warehouses and waste facilities are non-complying. At a minimum these land uses should be included as development not envisaged in this location (restricted development). The proposed Zone seeks low to medium rise buildings which is defined from 1 to 6 building levels (greater than what is currently proposed). The spatial map does not have information on the building height in metres. The draft Code requires a data overlay to limit heights to ensure consistency with current policy - building height difference (current building height maximum 12m).
15.	District Centre Zone – Woodville Policy Area 5 – Railway Station Precinct 21	Urban Neighbourhood	<ul style="list-style-type: none"> The current Concept Plan Map ChSt/24 was recently developed through a Ministerial Development Plan Amendment and should be included in the draft Code. The Concept Plan refers to the location of Core and Transition areas that have differences relating to land uses and scale. The current Precinct seeks a minimum 60 dwelling per hectare (dph) within the transition area and 70 dph within the core. The proposed zone seeks a min a 150 dph. The proposed zone needs to be amended to reflect current policy. Current TNV has minimum 12m building height. The current Precinct envisages up to 5 storeys (20.5m) in the core and transition but scaled down to 12m in height north of the new collector road and maximum 3 storeys fronting Actil Ave (transition area to the west). The existing policy needs to be reflected in the draft Code (TNV). The current Desired Character Statement seeks a specific 22% for public open space. This needs to be reflected in the draft Code for this location. <p>(Existing Policy: <i>These will include 22 per cent of the land to the south west of the St Clair Avenue extension being developed as open space along the Woodville Road frontage and an additional</i></p>

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p><i>area of land in this locality to be developed as a playing field. Other open space areas will include a shared-use recreational trail along the former Glenys Nunn Drive and an internal pocket park to provide further recreational opportunities for residents. The St Clair Reserve open space will be further developed for both passive and active recreation.)</i></p> <ul style="list-style-type: none"> • The car parking policy is generally consistent with Table ChSt/2A within the Development Plan as the draft Code defines Urban Neighbourhood Zone as a Designated Area. The draft Code seeks greater residential parking on site based on number of bedrooms than current provision (0.75 per dwelling) which is supported. • Consideration should be given for a 3m setback where interface with residential areas consistent with current policy. • It is acknowledged that the Affordable Housing Overlay and Noise and Air Emissions Overlay has been applied over this current Precinct which is consistent with current policy.
16.	Education Zone	Community Facilities Zone	<ul style="list-style-type: none"> • The proposed transition Zone is considered consistent with the intent of the existing Zone and the desired outcome is consistent with the existing Desired Character Statement within the Development Plan. • The City of Charles Sturt only contains one Education Zone, which includes the site of a private school. • The draft Code should consider as restricted development as a minimum uses such as industry, petrol filling station, road transport terminal, service trade premises, shops, warehouse. • Proposed zone encourages low to medium rise (1 to 6 storeys). The Education Zone seeks built form compatible in height and scale with surrounding land uses. In this case surrounding areas envisage a maximum of two storeys. The proposed Zone should include a TNV in this location for a maximum 2 storeys building height. There is currently no TNV in the draft Code.
17.	Home Industry Zone	Home Industry Zone	<ul style="list-style-type: none"> • The proposed transition zone is considered consistent with existing zone.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
18.	Local Centre Zone (includes Local Shopping Policy Area 7 and Stations Precinct 46)	Suburban Activity Centre	<ul style="list-style-type: none"> The proposed transition zone requires a TNV to limit heights to ensure consistency with current policy. The current zone envisages 9m building heights and only 12m in some parts (Bartley Terrace, Local Centre Zone). The proposed zone policy of low to medium rise equates up to 6 storeys. The current zone seeks a max floor area for retail of 450m2 while no limit is proposed in the transition zone. There are several Local Centre Zone sites that have areas greater than 10,000m2. A floor limit is considered warranted to prevent larger retail formats potentially locating in these sites. These sites should accommodate small-scale convenience shopping, office, service, medical and community facilities to serve the day-to-day needs of the local community consistent with the current zone. Consider the following additional Overlays for the Zone: <ul style="list-style-type: none"> Local Heritage Places Overlay for the Brompton Local Centre and Grange Local Centre. Historic Area Overlay required for existing centres located in Croydon, Woodville Park, Henley Beach and Hindmarsh.
19.	Metropolitan Open Space System Zone and includes the Linear Park (River Torrens/Karrawirra Parri) Policy Area 8	Open Space Zone	<ul style="list-style-type: none"> Consider additional policy to address the following: <ul style="list-style-type: none"> Public access is retained and enhanced for cyclists and pedestrians. Consideration of watercourses in the Open Space Zone for pedestrian and cycle paths and landscaping to consider the changing flow regime and width of waterways and be constructed of permeable material where practical to reduce stormwater runoff. Consider the following additional Overlays for the Zone: <ul style="list-style-type: none"> Local Heritage Places Overlay for the River Torrens Outlet which is a Local Heritage Place.
20.	Mixed Use Zone and includes the Urban Village Findon Policy Area 9	Suburban Employment	<p><u>Existing Employment and Village Precinct 50</u></p> <ul style="list-style-type: none"> This Precinct applies to an area in Kidman Park including an area recently included in a Development Plan Amendment (DPA) known as the Findon Road, Kidman Park (North) Mixed Use DPA. The DPA was approved by Council in late 2019 and is currently with the Minister for Planning awaiting a decision, which Council understands is imminent.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> • The proposed zone transition is not considered consistent with the current Development Plan policy which envisages medium density densities >35dph. The proposed zone is silent on residential land uses. • The Suburban Business and Innovation Zone within the draft Code is considered a more appropriate alternative over this Precinct as it encourages a range of businesses and residential land uses provided residential is subordinate to employment uses and do not prejudice operation of existing business. • The proposed zone in the draft Code also encourages shops up to 500m2 of floor area and shops over 1000m2 as restricted development. This is not consistent with the existing Zone in the development Plan, which identifies shops over 250m2 of floor area as non-complying. Amendments are required in the draft Code to ensure consistency with current policy. • The building height policy in the proposed zone is silent on maximum building height (either storeys or building levels). The current Precinct encourages 15m (4 storeys). This should be reflected in the Code. • The recent DPA also sought policy to address specific local nuances both in the zone policy and the associated Concept Plan. This policy is considered important to address interface impacts with the adjoining residential zone, addressing building envelopes, topography issues and recognising existing non-residential land uses in the locality and the need for new residential development to be design in a manner to address interface issues. If approved by the Minister, the policy contained in the recent DPA need to be reviewed and applied into the draft Code. • A Noise and Air Emissions Overlay needs to be included over the recent DPA section of the zone (if authorised by the Minister) on Findon Road, Kidman Park. • An Affordable Housing Overlay needs to be included over the recent DPA section of the zone (if authorised by the Minister) on Findon Road, Kidman Park. <p><u>Existing Village Living Medium Precinct 51</u></p>

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> This precinct is proposed in the Housing Diversity Neighbourhood Zone. The Precinct predominantly includes a recent housing development with building heights of 1 to 2 storeys (8.2m) with medium density housing 35 to 70 dph. The proposed Zone envisages low rise (1 to 2 building levels/ 9 metres) medium density housing which is considered appropriate. The intent of proposed zone is considered acceptable for this existing Precinct. Table 2 under Deemed to Satisfy, page 578, second row is missing the following 'except where' after class of development description. Table 3 – Deemed to Satisfy, page 583, there are no applicable policies for demolition. <p><u>Existing Village Living Low Precinct 52</u></p> <ul style="list-style-type: none"> This existing Precinct is proposed in the General Neighbourhood Zone. The Precinct contains established residential land uses and is considered consistent with the proposed transition zone.
21.	Mixed Use Zone	Suburban Business and Innovation Zone	<ul style="list-style-type: none"> The area includes Mixed Use Precinct 47, Hindmarsh Place Precinct 48 and South Road Precinct 49. The proposed zone is relatively consistent with the existing Zone seeking a mix of commercial and residential uses. Two-storey built form is currently envisaged, which is not consistent with the proposed new zone seeking low to medium rise (up to 6 storeys). It is recommended a TNV be included for these locations with built form consistent with current policy. There is also an inconsistency with floor area for shops. The current zone seeks a limit of 250m2, whereas the proposed zone envisages 500m2. The policy should be amended to reflect current policy. Existing Precinct 48 requires an Historic Area Overlay and State Heritage Place Overlay consistent with current Policy. There is no existing built form within Precinct 49, which is now contained within road infrastructure as part of the recent Torrens to Torrens Road development.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
22.	Neighbourhood Centre Zone	Suburban Activity Centre Zone	<p><u>Findon Policy Area 10 / Findon Centre East Precinct 84</u></p> <ul style="list-style-type: none"> This Precinct includes a recently authorised DPA which included specific policy that requires transitioning into the draft Code for this location. These policy considerations include: <ul style="list-style-type: none"> Seeking a small-scale supermarket up to 2000m2. Presentation of built form to Grange Road/Findon Road. Consolidating vehicle access points and improving connections to the retail core through safe crossing points. Non-conforming vehicle access points rectified through relocation and upgrade to comply with relevant standards. Safe and convenient movements through Noblet Street/Grange Rd intersection. Landscaping along road frontage and car parking areas. Appropriate interface treatments where abutting residential areas. Addressing off-site contamination which may exist on adjacent or nearby land, which may impact the use of the land within the zone. The relevant Concept Plan (ChSt/7 – Findon Policy Area 10) was recently updated as part of the DPA and should be retained in the draft Code. It details spatially the desired location for acoustic treatment and access/egress. There are no numerical variation tables applied to this Precinct in mapping under Technical and Numeric Variation Overlay but the zone refers to one in the PO DTS. The draft Code requires a data overlay to limit heights to ensure consistency with current policy being a maximum building height of 12m/3 storey. The draft Code proposes low rise (up to two building levels) to medium rise (3 to 6 building levels) with highest intensity at the centre of the zone. Consider as restricted development as a minimum industry, warehouse, waste reception, storage, treatment or disposal, fuel depot, road transport terminal consistent with current policy. Ensure the draft Code includes a Noise and Air Emissions Overlay as per current policy.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p><u>Findon Policy Area 10 / Retail Core Findon Precinct 53</u></p> <ul style="list-style-type: none"> Consistent with current policy the draft Code should include policy to emphasise this Precinct as the core retail area. <p><u>Findon Road Policy Area 11 / Retail Core Findon Precinct 55</u></p> <ul style="list-style-type: none"> This section is the core retail area in this locality and should be emphasised in the Code. <p><u>Findon Road Policy Area 11 / Commercial Fringe Findon Road Precinct 56</u></p> <ul style="list-style-type: none"> There are no numerical variation tables applied to this in mapping under Technical and Numeric Variation Overlay but the zone refers to one in the PO DTS. Require a data overlay to limit heights to ensure consistency with current policy - building height difference (current policy seeks 9m building height versus low rise (up to two building levels) to medium rise (3 to 6 building levels) with highest intensity at the centre of the zone. <p><u>Henley Square Policy Area 12 / Henley Square Precinct 57</u></p> <ul style="list-style-type: none"> There are no numerical variation tables applied to this in mapping under Technical and Numeric Variation Overlay but the zone refers to one in the PO DTS. Require a data overlay to limit heights to ensure consistency with current policy - building height difference (current policy seeks 10.2m building height versus low rise (up to two building levels) to medium rise (3 to 6 building levels) with highest intensity at the centre of the zone. It is acknowledged that the draft Code has included this area within an Historic Area Overlay, Local Heritage Places Overlay and State Heritage Places Policy Overlay consistent with current policy. <p><u>Royal Park Policy Area 13 / Retail Core Royal Park Precinct 59</u></p> <ul style="list-style-type: none"> There are no numerical variation tables applied to this in mapping under Technical and Numeric Variation Overlay but the zone refers to one in the PO DTS. Require a data overlay to limit heights to ensure consistency with current policy - building height difference (current building height

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p>policy seeks 9m versus low rise (up to two building levels) to medium rise (3 to 6 building levels) with highest intensity at the centre of the zone.</p> <ul style="list-style-type: none"> Precinct 59 is proposed as the core focus for shopping. The draft Code should consider how this can be reflected in policy. <p><u>Welland Policy Area 13</u></p> <ul style="list-style-type: none"> There are no numerical variation tables applied to this in mapping under Technical and Numeric Variation Overlay but the zone refers to one in the PO DTS. Require a data overlay to limit heights to ensure consistency with current policy - building height difference (current policy seeks 12m building height versus low rise (up to two building levels) to medium rise (3 to 6 building levels) with highest intensity at the centre of the zone. Precinct 61 is proposed as the core focus for shopping. The draft Code should consider how this can be reflected in policy.
23.	Residential Zone	Housing Diversity Neighbourhood Zone	<p><u>Inner Suburban Policy Area 15, Western Edge Policy Area 17, West Lakes Medium Density Policy Area and Integrated Medium Density Policy Area 20, Woodville Medium Density Policy Area 21</u></p> <ul style="list-style-type: none"> The deemed to satisfy residential development or performance assessed residential development by SAHT or registered Community Housing providers does not need to satisfy any zone/subzone provisions, and only needs to comply with 'Housing Renewal' General Development Policies. It is recommended that policy be included to ensure consistency with the assessment of other residential developments that are assessed against the relevant provision of the zone. The Desired Outcome refers to 'low-rise medium density housing', which means 1-2 storeys only, whereas current DP policy for Policy Areas 19, 20 and 21 allow for 3 storey residential development in certain locations. The draft Code should be amended to seek consistency with current policy. DTS/DPF 1.5 and 1.6 refers to "an arterial or collector road" and PO 1.6 refers to "higher order roads" (in relation to shops, offices and consulting rooms). The Code should either define the term

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p>'higher order roads' to mean "arterial, sub-arterial or distributor roads" or just refer to these types of roads (and not collector roads).</p> <ul style="list-style-type: none"> DTS/DPF 2.1 refers to "a net residential development of up to 70 dwellings per hectare." This equate to 143m2 average site area per dwelling. Current Policy Area 15 policy specifically refers to up to 40 dwellings/hectare, as well as site area requirements of between 220m2 (group, RFB and row dwellings) and 250m2 (detached and semi-detached). There is no reference to minimum frontage requirements for different dwelling types. Seeking amendments to make the proposed policy intent consistent with current policy. DTS/DPF 3.1 refers to 'Building height Data Overlay', which does not appear to have been determined yet. Performance Assessed Pathways, Table 3, Assessment of development, all policies should be applicable to the assessment in the Zone.
24.	Residential Zone	General Neighbourhood Zone	<p><u>Mid Suburban Policy Area 16, Western Edge Policy Area 17 and West Lakes General Policy Area 18,</u></p> <ul style="list-style-type: none"> Refer to row 23 and covering letter regarding comments on deemed to satisfy residential development or performance assessed residential development by the SAHT or registered Community Housing providers. DO refers to 'low and medium density housing' but subsequent policies fail to limit medium density housing to suitable locations (ie will be possible throughout the zone). DTS/DPF 1.5 refers to "an arterial or collector road" and PO 1.6 refers to "higher order roads" (in relation to shops, offices and consulting rooms). Either define the term 'higher order roads' to "arterial, sub-arterial or distributor roads" OR just refer to these types of roads (and not collector roads). Site area requirements for semi-detached dwellings is identified in DTS/DPF 2.1 as 300m2, which is 50m2 less than existing policy Area 18. Site area requirements for row dwellings/terraces is identified in DTS/DPF 2.1 as 200m2, which is 50 – 150m2 less than existing Policy Area 16,17 and 18.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> • Frontage requirements for detached, semi-detached, row and group/RFBs in DTS/DPF 2.1 are all less than current Development Plan policy (eg 7m compared to 8-10m for row dwellings). • The biggest impact of the above proposed changes will be on West Lakes General Policy Area 18, as well as greater potential for row dwellings throughout Policy Areas 16,17 and 18. • DTS/DPF 4.1 refers to 2 building levels as 9m, whereas current DP (and PPL) refers to 8.5m. • DTS/DPF 5.2 refers to DTS 3.1. This should be DTS 5.1. • There is no rear boundary setback specified. • Under 'Procedural Matters' sub-heading 'Notification' part (b) reference is made to "Suburban Neighbourhood Zone", whereas this should be "General neighbourhood Zone". • DTS/DPF 10.1 part (b) requiring a setback of at least 4m from other dwellings/RFBs should preclude rear boundary setbacks, which are already referred to in DTS/DPF 8.1. • There is specific policy within the Western Edge Policy Area 17, which envisages potentially 3 storey building height in certain locations eg. near the existing Neighbourhood Centre. The draft Code should include this policy within a TNV to ensure consistency with current policy.
25.	Residential Zone	Urban Renewal Neighbourhood Zone	<p><u>Cheltenham Park Policy Area 22</u></p> <ul style="list-style-type: none"> • Shops are only restricted if over 1000m². Land uses such as industry, waste treatment should be restricted. • Current DP policy encourages retail with gross leasable area up to 5000m². • Current Policy Area envisages medium to high density. The proposed Zone seeks medium density (70dph). There is an inconsistency given there are a number of super lots yet to be developed near the activity centre and station that could be developed at a high density. There are also existing developments from 3 to 5 storeys in the policy area that are high density (>70dph). • The existing Desired Character Statement seeks open space of policy area retained for open space. This policy should be reflected in the draft Code. • Policy in the Desired Character Statement envisages 15% affordable housing (pre-introduction of affordable housing overlay). The proposed draft Code Affordable Housing Overlay should be included over this area.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p><u>Woodville West Policy Area 23</u></p> <ul style="list-style-type: none"> Policy in the Desired Character Statement envisages 15% affordable housing (pre-introduction of affordable housing overlay). The proposed draft Code Affordable Housing Overlay should be included over this area. Current policy seeks between 35-70 dph outside of core and in the core a min of 70 dph. The policy area is not fully developed, and it is recommended that the existing Concept Plan be transitioned into the draft Code to understand the spatial location of proposed densities. The Minister's Concept Plan ChSt/22 shows the spatial application of building heights and location of the desired densities and should be transitioned into the draft Code. The current policy seeks a max of 5 storeys which is inconsistent with the proposed zone (up to 4 levels) although policy encourages low to medium rise (up to 6 storeys). A TNV is recommended for this location to be consistent with current policy and Concept Plan.
26.	Residential Character Zone	Suburban Neighbourhood Zone	<p><u>Includes the following Precincts: Bowden/Brompton 66, Brompton Park 67, Early SA Housing Trust 68, Croydon/West Croydon 69, Allenby Gardens 70, Pre-World War One 71, Welland Character 72, Woodville South Character 73, Kilkenny Character 74, Woodville Park 75, Woodville Character 76, Cheltenham East 77, Cheltenham West 78, Henley Beach 79, Grange 80</u></p> <ul style="list-style-type: none"> Previous Council resolution to advocate for Non-Complying trigger for a telecommunications facility in the City's Historic Conservation Area. Under the draft Code there is no non-complying development and it is recommended that a telecommunications facility be classed as restricted development. Refer to row 23 and covering letter regarding comments on deemed to satisfy residential development or performance assessed residential development by the SAHT or registered Community Housing providers. DTS/DPF 1.4 refers to "an arterial or collector road" (in relation to shops, offices and consulting rooms). Should either define the term 'higher order roads' to "arterial, sub-arterial or distributor roads" OR just refer to these types of roads (and not collector roads).

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> It is not clear what the standards to be contained within the <i>Minimum Allotment Size Technical and Numeric Variation Overlay</i>, <i>Minimum Allotment Frontage Technical and Numeric Variation Overlay</i> and <i>Building Height Technical and Numeric Variations Overlay</i> are/will be as the mapping of this information is not available.
27.	Special Uses Zone	Open Space Zone	<ul style="list-style-type: none"> Includes the SA Water treatment facility, the West Lakes Golf Club, the Grange Golf Club, the Royal Adelaide Golf Club, Nazareth High School, Hindmarsh Cemetery, Cheltenham Cemetery The proposed zone does not fit with the current land uses in the Special Uses Zone. Consider Recreation Zone for the existing Golf courses. Golf courses require a definition as it is excluded from the definition of recreation area under Part 7. Consider Community Facilities Zone for the existing high school, cemeteries, SA Water treatment facility. Concept Plan Map ChSt/19- former Underdale Campus Site now the Nazareth High School is developed and not warranted. Local Heritage Overlay required (SA Water site at West Lakes) (Cheltenham Cemetery) State Heritage Overlay required (Hindmarsh Cemetery) (Cheltenham Cemetery) The Nazareth High School has specific building height policy in the current zone which should be included as a TNV. There are no numerical variation tables applied to this in mapping under Technical and Numeric Variation Overlay and the proposed zone does not provide policy guidance on desired building heights.
28.	Stadium Zone	Recreation Zone	<ul style="list-style-type: none"> The proposed draft Code zone is considered consistent with the intent of the current Development Plan Zone.
29.	Suburban Activity Node	Urban Neighbourhood Zone	<ul style="list-style-type: none"> Relevant Concept Plan Map ChSt/30 for Seaton was a result of a recent approved DPA. The Concept envisages up to 4 building levels which does not reconcile with the definition of low to medium rise buildings (a variation of 1 to 6 levels). It is recommended that the Concept Plan be transitioned into the draft Code.

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> • The draft Code is silent on encouraging rear loaded development desired in this zone. • Refer to row 23 and covering letter regarding comments on deemed to satisfy residential development or performance assessed residential development by the SAHT or registered Community Housing providers. • PO 1.3 encourages light industrial and commercial uses throughout the zone, whereas current Development Plan restricts these land uses to the Core Area. Policy should be consistent with the current Development Plan. • DTS/DPF 1.6 includes floor space limits for shops, offices and consulting rooms, which is different to current Development Plan locational preferences and restrictions. • PO 2.5 and 2.6 refers to 'the consistent established streetscape'. All of these areas (Suburban Activity Node Zone and Urban Core Zone) either have 'established streetscapes' which are in transition or in need of transformation, therefore probably not an appropriate term. • PO 3.1 and 3.2, and DTS/DPF 3.1 and 3.2 refer to 'a neighbourhood zone' in relation to Interface Heights. It is not clear what this term relates to - is it any zone with 'Neighbourhood' in the title? • DTS/DPF 3.1 and 3.2 images are not particularly legible. • Current Urban Core Zone PDCs 16 and 22 re: solar access/passive solar design are not replicated in the proposed zone. • Current Urban Core Zone PDC 42 re: road widening not replicated. • No reference to the need for sensitive land uses to mitigate the impacts of existing EPA licenced activities (eg existing smallgoods processing). Policies should be included in the draft Code to reflect this. • No limit on the height of masonry fences (see PDC 18 in the Development Plan). • Noise and Air Emissions Overlay (Seaton) and Affordable Housing Overlay (Seaton) required as they are contained in the current Charles Sturt Development Plan.
30.	Urban Core Zone	Urban Neighbourhood Zone	<ul style="list-style-type: none"> • See comments for Suburban Activity Node above in row 29.


PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> The spatial application of the draft Code has inconsistencies with the required building height in metres and storeys. The building height in storeys should show the minimum and maximum heights in this location as per the Concept Plan. Same issue within the Bowden development area (as per Concept Plan Map ChSt/23/Bowden Urban Village) as well as the recent Bowden Brompton DPA Area (Concept plan Map ChSt/31 Bowden Brompton Urban Core Zone). The draft Code includes current Development Plan Concept Plans for Bowden Urban Village and Bowden/Brompton. Recent negotiations at the ERD level proposed amendments to the Minister for Planning regarding a revised concept plan and a 1.0 metre minimum setback to Chief Street which should be considered as part of the draft Code transition in lieu of the current version. A copy of this revised Concept Plan is attached for information. The policy is silent on encouraging rear loaded development as envisaged in current zone Desired Character Statement. The West development site – spatial representation of Core boundary not consistent with current Development Plan Concept Plan Map. Urban Core Zone, West Lakes – the current Desired Character Statement seeks a specific 15% for public open space. This needs to be reflected in the draft Code for this location. <p>Existing Policy: <i>These shared pathways will provide the basis for pedestrian and greenway linkages of regional importance that may extend beyond the zone. This will culminate in the order of some 15 per cent open space being provided as part of the total development of West Lakes.</i></p> <ul style="list-style-type: none"> The Noise and Air Emissions Overlay and Affordable Housing Overlay (West development, West Lakes and Bowden and Brompton) is required to be transitioned.
31.	Urban Employment Zone	Employment Zone	<ul style="list-style-type: none"> The current CCS Urban Employment Zone has an Industry Interface Area which seeks lighter land uses around the interface with more sensitive zones. It is considered that proposed zone does not afford appropriate protection to both adjacent residential land uses, and the potential uses

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<p>anticipated within the adjacent Employment Zone. It is recommended that a sub-zone be applied in the locations of the existing Industry Interface Area to act as a transition area between sensitive zones and the core industry areas and include policy that envisages appropriate land uses of a lesser intensity to that of the proposed Employment Zone as currently provided by the existing Development Plan.</p> <ul style="list-style-type: none"> • Table 2 – Deemed to Satisfy Pathway, Advertisement, Building Near Airfields, DTS 1.2 – is not relevant for the assessment of an advertisement as it deals with the assessment of land uses. • Table 2 – Deemed to Satisfy Pathway, Advertisement, Major Transport Routes – should read ‘Major Urban Transport Routes’. • Table 2 – Deemed to Satisfy Pathway, Advertisement, Urban Transport Routes, refers to DTS 8.1 and 10.1 – they are not there? • Table 3 – Performance Assessed Development – All policies should be included in the Assessment • Table 3 – Performance Assessed Development, Advertisement, General Development – why not all the policies contained in Advertisement (Appearance) section? • Table 3 – Performance Assessed Development, Advertisement, Overlay, Building Near Airfields, PO 1.2 – how would an advertisement attract birds – this is a land use-based policy? • Table 3 – Performance Assessed Development, Advertisement, Overlay, Defence Aviation Area, PO 1.3 – how does this policy relate to advertisement assessment? • Table 3 – Performance Assessed Development, Advertisement, Overlay, Urban Transport Routes, PO 8.1, 10.1 – they are not there? • Table 3 - Performance Assessed Development, Advertisement, Overlay, Urban Transport Routes, PO 8.1, 10.1 – they are not there? • Table 3 - Performance Assessment Pathway – Bulky Goods Outlet – Zone policies – does not include PO 5.1, Landscaping, PO 6.1, Fencing, PO 7.1, Advertising. • Employment Zone, Table 4 – Restricted Development – the draft Code proposes Industry as restricted development but special industry as an exclusion?

PART 2 – ZONES AND SUB ZONES			
No.	Current Development Plan Zone	Draft Planning and Design Code Zone	Comments
			<ul style="list-style-type: none"> If residential development is not encouraged unless subordinate to support a non-residential land use then why not propose this type of development as restricted? Should consider also exceptions like the current urban Employment Zone eg. Caretakers residence, alterations / additions to an existing dwelling, short term accommodation ancillary to and in association with industry. Table 4 – other sensitive land uses currently non-complying in the zone include nursing homes, pre-schools, primary school, tourist accommodation hospitals. Why are these not considered restricted? <p><u>Bulky Goods Policy Area 6</u></p> <ul style="list-style-type: none"> Similar uses envisaged as in Precinct 45 Industry is a notable difference identified as Restricted development Special Industry should be restricted. <p><u>Main Road Commercial Policy Area 25</u></p> <ul style="list-style-type: none"> The existing Policy Area seeks retail with a min 500m2 gross leasable floor area. How does this reconcile with the draft Zone Module?

PART 3 – OVERLAYS		
No.	Reference	Comments
32.	Affordable Housing Overlay	<ul style="list-style-type: none"> Only applies to existing Affordable Housing Designated Areas (eg Urban Core Zone, Suburban Activity Node Zone, part of R20 Policy Area in Devon Park, and part of Woodville Road District Centre Zone. DTS/DPF 3.1 allows a 20% reduced minimum site area for affordable housing. DTS/DPF 3.2 allows a 1 storey height increase for affordable housing in General Neighbourhood, Housing Diversity Neighbourhood and Suburban Neighbourhood Zones, or a 30% increase in any other zone. DTS/DPF 4.1 allows for no on-site car parking for apartments and 1 space/dwelling for any other dwelling, when constituting affordable housing. These height and car parking ‘discounts’ need to be considered with regards to other policy dispensation for SAHT/Community Housing providers.
33.	Airport Building Heights (Regulated)	<ul style="list-style-type: none"> Page 2065, DTS/DPF 1.2, missing full stop.
34.	Building Near Airfields Overlay	<ul style="list-style-type: none"> PO 1.3 seeks structures sensitive to aircraft noise intrusion to provide appropriate noise interior amenity. Not sure what the policy is seeking, consider a DTS/DPF with the policy. PO 1.2 seeks to prevent land uses that attract wildlife near the airport. Development of this nature should be considered as a referral to the aviation safety authority.
35.	Coastal Areas Overlay	<ul style="list-style-type: none"> Applies to the existing Coastal Open Space Zone DO 1 – page 2075 - Support this Desired Outcome. Suggest the wording ‘flooding erosion’ include ‘wind erosion’, or just erosion. PO 3.1 – page 2077 - Should/could other development techniques and principles be listed here to avoid the need for coast protection works?
36.	Character Area Overlay	<ul style="list-style-type: none"> Applies to existing residential Historic Conservation Areas (HCA) only (eg not Hindmarsh Mixed Use HCA). Not clear why duplication of the Historic Character Area Overlay provisions is necessary – policies are very similar. Also requires a Character Area Statement for each area, which duplicates the Historic Area Statements. Remove Overlay as Suburban Neighbourhood Zone (currently Residential Character Zone) addressed by Historic Area Overlay.
37.	Design Overlay	<ul style="list-style-type: none"> Does NOT apply to any part of the CCS.

PART 3 – OVERLAYS		
No.	Reference	Comments
		<ul style="list-style-type: none"> Question whether it should apply to existing Urban Core Zone in Bowden/Brompton for 5+ level buildings.
38.	Future Road Widening Overlay	<ul style="list-style-type: none"> Applies to some key arterial road intersections (eg Port Road/Park Terrace/Adam Street). Question whether a similar overlay could apply to residential redevelopment areas where road widening of local and collector streets has been identified as necessary (g Bowden/Brompton).
39.	Hazards (Flooding) Overlay	<ul style="list-style-type: none"> As detailed in the covering letter the Hazards (Flooding) Overlay should apply to the City of Charles Sturt. All flood maps from the Water connect website should be included in the draft code. The City of Charles Sturt stormwater flood mapping is an essential requirement for development assessment purposes.
40.	PO 1.1 and DTS/DPF 1.1	<ul style="list-style-type: none"> There are several areas within Charles Sturt where flood depth will be > 0.3 above natural ground level. The City currently does not measure velocity. It is recommended under PO 1.1 that “and” should be replaced by “or”. Whilst stormwater flow in gutters is likely to be >0.3m per second, once it gets to the lowest point and starts building up it may not be 0.3m/sec. From an economic / social consequence perspective even 0.1m of stormwater flowing through house / businesses will do a lot of damage. Question the requirement that development needs to be 300mm above 1 in 100 year levels. The City of Charles Sturt accepts 150mm minimum clearance to 1 in 100 year flood levels. 150mm is more practical and will prevent need for excessive retaining walls between properties. No specification of the minimum floor level required in non-flood prone areas? Council’s current requirements is 0.3m above the water table.
41.	PO 1.2	<ul style="list-style-type: none"> A public stormwater system is “deemed” to be capable of catering for a 1% AEP flood event if runoff can be contained within the Road Reserve (public area- generally property boundary to property boundary AKA road reserve, detention basins etc.). This performance outcome cannot be met in many instances including many properties in and around the City’s Civic Centre, as an example only:

PART 3 – OVERLAYS		
No.	Reference	Comments
		
42.	Terminology – Flood Waters and stormwater	<ul style="list-style-type: none"> The terms flood waters and stormwater have been used extensively in the draft code. A definition for the terms “flood waters” and “stormwater” is required and then determine which section will apply to the City of Charles Sturt. As an example, along the River Torrens “flood waters” may need to be considered. Where there is no natural water systems the term stormwater is used.
43.	Design in Urban Areas, RESIDENTIAL DEVELOPMENT - 3 BUILDING LEVELS OR LESS, Water Sensitive Design, PO 22.3, - Development creating 5-19 dwellings, page 2243	<ul style="list-style-type: none"> This set of policies repeat in different sections of the draft Code. This significantly dilutes the City of Charles Sturt current engineering requirements. Throughout the draft Code there is no reference to On-site Detention and only the terms “capture and retain” is used. Requirement for more than 5 dwellings should be pre-development flow for 1 in 5 is limited to post development detention design for 1 in 100 year ARI.

PART 3 – OVERLAYS		
No.	Reference	Comments
		<ul style="list-style-type: none"> In relation to part (a) it is requested that the policy focus on peak flow and not specify storm duration as peak flow is normally at 10 min duration for the City of Charles Sturt. In relation to part (b) the policy should capture and detain difference for a 1 in 100 year ARI. Policy should also direct that flows to the street water table should be limited as per Council's engineering recommendations.
44.	Land division in Urban Areas Minor Land divisions (under 20)	<ul style="list-style-type: none"> Refer to comments in row 41.
45.	Major land divisions (more than 20)	<ul style="list-style-type: none"> Refer to comments in row 41.
46.	Major Urban Transport Routes Overlay	<p>DTS/DPF 1.1 c</p> <ul style="list-style-type: none"> Clarify what consists "roadside infrastructure" <p>DTS/DPF 2.1</p> <ul style="list-style-type: none"> DTS is confusing as to what is being assessed/approved – wording needs to be refined <p>DTS/DPF 4.1</p> <ul style="list-style-type: none"> DTS is confusing as to what is being assessed/approved – wording needs to be refined. Define "Controlled Access Road" Clarification required around distances to access points. <p>DTS/DPF 5.1</p> <ul style="list-style-type: none"> Clarify whether parked vehicles should be taken into consideration when assessing sight distances or only permanent objects. <p>DTS/DPF 10.1</p> <ul style="list-style-type: none"> DTS needs to reference pedestrian access improvements achieved through provision of corner cut-of. Diagram needs to be clearer.
47.	Design in urban areas Water sensitive design	<ul style="list-style-type: none"> 80% of roof runoff needs to be connected to a retention tank. This is a change from the City of Charles Sturt requirement of 90% to be connected to detention tank and 50% to retention tank. Overall there are no objections with retention tank requirements however more consideration to detention should be incorporated in the draft code for developments.

PART 3 – OVERLAYS		
No.	Reference	Comments
		<ul style="list-style-type: none"> There is no distinction between developments of less than 5 dwellings and development of more than 5 dwellings.
48.	ALL NON-RESIDENTIAL DEVELOPMENT Water Sensitive Design, PO 41.3 and DTS/DPF 41.3, page 2252	<ul style="list-style-type: none"> The policy should reflect 1 in 5 year ARI and no duration specified as per previous section. The policy should reflect maintaining and retain on site 1 in 100 year ARI detention capacity. Policy should also direct that flows to the street water table should be limited as per Council's engineering recommendations.
49.	General commentary on stormwater policy	<ul style="list-style-type: none"> There very are little requirements for developments of less than 5 dwellings for stormwater in the draft code. Overall a key issue from a technical point of view is that the City of Charles Sturt requirements for stormwater design are not in the draft Code. The City of Charles Sturt engineering requirements seek the following: "Peak 1 in 5 year ARI event pre development flow cannot be exceeded by Peak 1 in 100 year ARI post development flow for any development." Refer to Council's engineering requirements via www.charlessturt.sa.gov.au
50.	Historic Area Overlay	<ul style="list-style-type: none"> The extent of the overlay around the former Brompton Gasworks site needs to be reduced to reflect recent State Heritage listing. Recommended policy amendments detailed in RED or as a strike-through below: <p><i>Historic Area Overlay Assessment Provisions (AP) Desired Outcome (DO)</i></p> <p><i>DO 1</i> Retain and reinforce historic themes and characteristics through conservation, enhancement and contextually responsive development, design and adaptive reuse that responds to existing coherent patterns in streetscapes and built form as expressed in the Historic Area Statement.</p> <p><i>Built Form PO 1.1</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>The form of new buildings and structures that are visible from the public realm are consistent with the prevailing historic attributes and characteristics of the historic area.</i></p> <p><i>DTS 1.1 None are applicable</i></p> <p><i>PO 1.2</i> <i>Development is consistent with the prevailing building and visible external wall heights in the historic area.</i></p> <p><i>DTS 1.2</i> <i>None are applicable</i></p> <p><i>PO 1.3</i> <i>Design and architectural detailing of street facing buildings complement the prevailing characteristics in the historic area, including reinstatement of lost original detail</i></p> <p><i>DTS 1.3</i> <i>None are applicable</i></p> <p><i>PO 1.4</i> <i>Development is consistent with the prevailing front and side boundary setback pattern in the historic area.</i></p> <p><i>DTS 1.4</i> <i>None are applicable</i></p> <p><i>PO 1.5</i> <i>Materials are either consistent with or complement those within the historic area.</i></p> <p><i>DTS 1.5 None are applicable</i></p> <p><i>Alterations and additions</i></p> <p><i>PO 2.1</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>Alterations and additions complement the subject building and are sited to ensure they do not dominate the primary facade, and employ a contextual design approach, respectful of the side setbacks in design and placement and the original character.</i></p> <p><i>DTS 2.1</i> <i>Alterations and additions are fully contained within the roof space of an existing building or located to the rear with no external alterations made to the building elevation facing the primary street.</i></p> <p><i>PO 2.2</i> <i>Encourage the adaptive reuse of buildings that complement the prevailing historic values and character of the locality, by enabling complementary changes to buildings to accommodate new land uses, particularly to the rear.</i></p> <p><i>DTS 2.2</i> <i>None are applicable</i></p> <p><i>Ancillary development</i> <i>PO 3.1 Ancillary development, including carports, outbuildings and garages, complements the historic character of the area and associated buildings, sited to ensure they do not dominate the primary facade, and employ a contextual design approach.</i></p> <p><i>DTS 3.1</i> <i>None are applicable</i></p> <p><i>PO 3.2</i> <i>Ancillary development, including carports, outbuildings and garages, are located behind the building line of the principal building(s), sited to ensure they do not dominate the primary facade, and employ a contextual design approach.</i></p> <p><i>DTS 3.2</i> <i>None are applicable</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>PO 3.3</i> <i>Advertising and advertising signage are located and designed to complement the building, be unobtrusive, not conceal or obstruct significant architectural elements and detailing, or dominate the building or its setting, through integration with the building elements.</i></p> <p><i>DTS 3.3</i> <i>None are applicable</i></p> <p><i>PO 3.4</i> <i>Front fencing and gates are consistent with the traditional period, style and form of the associated built form and generally be low or open.</i></p> <p><i>DTS 3.4</i> <i>None are applicable</i></p> <p><i>Land Division</i></p> <p><i>PO 4.1</i> <i>Land division creates allotments that are capable of accommodating buildings of a bulk and scale that reflect existing buildings and setbacks in the historic area, without compromise to the setting and performance of existing buildings.</i></p> <p><i>DTS 4.1</i> <i>None are applicable</i></p> <p><i>Context and Streetscape Amenity</i></p> <p><i>PO 5.1</i> <i>The width and number of driveways and other vehicle access ways are consistent with the prevalent width of existing driveways of the historic area.</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>DTS 5.1 None are applicable</i></p> <p><i>PO 5.2</i> <i>Development maintains the valued landscape patterns and characteristics that contribute to the historic area, except where they compromise safety, create nuisance, or impact adversely on existing buildings or infrastructure.</i></p> <p><i>DTS 5.2</i> <i>None are applicable</i></p> <p><i>Demolition</i></p> <p><i>PO 6.1</i> <i>Buildings and structures that demonstrate the historic characteristics as expressed in the Historic Area Statement are not demolished, unless:</i> <i>(a) the front elevation of the building has been substantially altered and cannot be reasonably, economically restored in a manner consistent with the building's original style; or</i> <i>(b) the existing building façade does not contribute to the historic character of the streetscape; or</i> <i>(c) the structural integrity or condition of the building is beyond economic repair;</i></p> <p><i>DTS 6.1</i> <i>None are applicable</i></p> <p><i>PO 6.2</i> <i>Partial demolition of a building where that portion to be demolished does not contribute to the historic character of the streetscape.</i></p> <p><i>DTS 6.2</i> <i>None are applicable</i></p> <p><i>PO 6.3</i></p>

PART 3 – OVERLAYS			
No.	Reference	Comments	
		<p><i>Buildings, or elements of buildings, that do not conform with the values described in the historic areas statement may be demolished, provided a suitable replacement development satisfying PO1.1 to 1.5 is approved prior to demolition.</i></p> <p><i>DTS 6.3</i> <i>None are applicable</i></p> <p><i>Ruins</i> <i>PO 7.1</i> <i>Development that conserves and complements features and ruins associated with former activities of significance including those associated with mining, farming and industry.</i></p> <p><i>DTS 7.1</i> <i>None are applicable</i></p>	
51.	Historic Area Statements	<ul style="list-style-type: none"> Following the Commission's decision to include Historic Area Statements (HAS) within the Historic Areas Overlay as a means of maintaining key desired policy from existing Desired Character Statements, the following HAS have been developed for the existing precincts located in the City's Historic Conservation Areas based on existing policy contained in the precincts Desired Character Statements and through the advice of Council's Heritage Adviser. 	
52.	Precinct 48 – Hindmarsh Place	Heritage Characteristics	Prevailing Characteristics
53.		Era and/or style of development	<ul style="list-style-type: none"> 1860s – 1930s
54.		Subdivision Pattern	<ul style="list-style-type: none"> Uniform small allotments interspersed with larger allotments
55.		Architectural Buildings	<ul style="list-style-type: none"> Single storey attached and detached cottages, row dwellings, former fire station, former Christian Chapel, former municipal hall, former brewery, Victorian churches
56.		Materials	<ul style="list-style-type: none"> Rendered masonry, red brick, bluestone, limestone and sandstone walls Decorative brickwork detailing to windows and doors Corrugated galvanised steel roofing

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Painted decorative timber posts and fascia elements
57.		Roof form	<ul style="list-style-type: none"> Steeply pitched gable and hipped roofs facing the street, with various separate verandah form and saw-tooth design (former brewery) Steeple and bell tower Some parapet walling
58.		Setting and Public Realm	<ul style="list-style-type: none"> Small setbacks from the street
59.		Fencing	<ul style="list-style-type: none"> Substantial rendered masonry with brick capping, and cast iron infill fences and gates
60.		Height	<ul style="list-style-type: none"> Typically, single storey with ceiling heights at least 3m Industrial and former church buildings with substantial ceiling and wall heights
61.	Precinct 5 – Hindmarsh District Centre Zone	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1840s to 1930s
		Subdivision Pattern	<ul style="list-style-type: none"> Narrow fronted with deep allotments facing Port Road Wider allotments to Manton and Milner Street
		Architectural Buildings	<ul style="list-style-type: none"> Narrow fronted two-storey built form interspersed with some narrow fronted single storey of intimate scale Generous verandahs over footpaths, balconies and parapets with some decorative elements including pediments Some detached single and two storey residential buildings to Orsmond Street Occasional upper level balconies Vertically proportioned elements with high solid to void ratio, particularly at upper levels Substantial church buildings
		Materials	<ul style="list-style-type: none"> Limestone, bluestone, sandstone, face red brick walls and rendered walls Use of brick and rendered quoins

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Corrugated galvanised steel roofing Decorative cast iron posts and balustrades Painted timber posts and fascia elements
		Roof form	<ul style="list-style-type: none"> Decorative parapets to street frontages and returns Steeply pitched hipped roofs visible behind parapets, with separate, wide verandahs across frontage Some gable forms including simple cottage form to Milner Street
		Setting and Public Realm	<ul style="list-style-type: none"> Historic heart of the Hindmarsh Village and the principal area for a range of retail, business, ecclesiastic and office uses
		Fencing	<ul style="list-style-type: none"> Built form typically to the street with verandahs over public realm Some rendered masonry fencing with cast iron infill
		Height	<ul style="list-style-type: none"> Single and two-storey built form with ceiling heights that vary from 3m through to substantial church buildings
62.	Precinct 57 – Henley Beach	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1840s to 1920s
		Subdivision Pattern	<ul style="list-style-type: none"> Traditional patterns of development incorporating verandahs, balconies and parapets clustered around Henley Square
		Architectural Buildings	<ul style="list-style-type: none"> Substantial two-storey buildings with wide balconies and verandahs, some over footpaths Traditional single storey buildings with verandahs over footpaths Modern development including large expansive verandahs on the square
		Materials	<ul style="list-style-type: none"> Bluestone, sandstone, red brick walls and rendered walls Some corrugated iron walling Use of brick and rendered quoins, brick banding and other traditional decoration Imposing masonry pediments and gables with brick banding

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Corrugated steel roofing Decorative cast iron and painted timber verandahs and balconies
		Roof form	<ul style="list-style-type: none"> Decorative parapets to the street and Henley Square facades Steeply pitched hipped and gable roof forms, with attached balconies and verandahs across frontage Skillion and curved (bull nose) verandah roof forms
		Setting and Public Realm	<ul style="list-style-type: none"> Historic heart of Henley Beach and the principal area for a range of retail, business and entertainment uses
		Fencing	<ul style="list-style-type: none"> Some low masonry walling Typically, open shop fronts with verandahs over public realm
		Height	<ul style="list-style-type: none"> Single and double storey buildings with ceiling heights at least 4.5m per floor giving an imposing character
63.	Eighth Street, Bowden	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1860s – 1890s
		Subdivision Pattern	<ul style="list-style-type: none"> Intimate scaled narrow fronted and regular rectangular allotment containing three pairs of semi-detached dwellings and one detached dwelling
		Architectural Buildings	<ul style="list-style-type: none"> Single storey semi-detached dwellings and detached dwelling Gable facing the street defining each semi-detached dwelling
		Materials	<ul style="list-style-type: none"> Rendered masonry walls with attached front verandahs Brick capping to parapets with some decoration Corrugated steel roofing
		Roof form	<ul style="list-style-type: none"> Steeply pitched gable roofs facing the street Skillion verandah roof forms or variable pitch
		Setting and Public Realm	<ul style="list-style-type: none"> Front wall setbacks typically around 2 metres with verandah forward of front wall

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Fencing	<ul style="list-style-type: none"> Traditional and some non-original low rendered masonry and timber picket fencing with occasional tubular-steel
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights around 3m High solid to void ratio and vertically proportioned openings
64.	Bowden/Brompton 66	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1840s to early 1900s in Bowden Brompton and Ovingham Victorian era with an intimate and small-scale character Some parapet walling to street with visible side return Chimneys; brick or painted render
		Subdivision Pattern	<ul style="list-style-type: none"> Small, long narrow allotments in Bowden Brompton
		Architectural Buildings	<ul style="list-style-type: none"> Single storey, detached and attached, single and double fronted workers' cottages Shop and dwelling typically on street corners Early commercial and industrial buildings Detached and semi-detached bungalow dwellings with wide verandahs, austerity and later townhouses
		Materials	<ul style="list-style-type: none"> Red brick and bluestone walls and piers Render to verandah piers, banding and parapets Corrugated steel roofing in galvanised or paint finish OG guttering in galvanised or paint finish Painted timber to window frames, doors and roof trim
		Roof form	<ul style="list-style-type: none"> Typically, small span steeply pitched gable and hipped 'M' roofs facing the street with ridge perpendicular or parallel to the street Separate verandah to higher front wall or parapet
		Setting and Public Realm	<ul style="list-style-type: none"> Narrow streets with minimal on site car parking Small setbacks from the street

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Original shopfronts to street corners Industrial buildings constructed to street frontages
		Fencing	<ul style="list-style-type: none"> Low front fencing, typically picket fencing and low masonry walls or combination thereof
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m Industrial scale walls of up to 5m
65.	Ovingham 66	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1850s to 1900s 1930s to 1940s 1970s to 1980s (SA Housing Trust) Chimneys; brick or painted render
		Subdivision Pattern	<ul style="list-style-type: none"> Small narrow lots, often on strongly sloping sites Allotment shape and size variable and angled to suit strongly sloping sites and street pattern including Albert Turnbull Reserve
		Architectural Buildings	<ul style="list-style-type: none"> Single storey, detached and attached, single and double fronted workers' cottages bungalows and Austerity houses Some early SA Housing Trust stock
		Materials	<ul style="list-style-type: none"> Bluestone, sandstone and pressed metal/corrugated walls Red brick walls, chimneys and piers Render to verandah piers, chimneys and banding Corrugated steel roofing in galvanised or paint finish OG guttering in galvanised or paint finish Painted timber to window frames, doors and roof trim
		Roof form	<ul style="list-style-type: none"> Typically gable and hipped roofs facing the street, with separate verandah form Generous roof planes and eaves overhangs to bungalows

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Low wide bungalow style overhang verandah or gable
		Setting and Public Realm	<ul style="list-style-type: none"> Small to some generous variable setbacks from the street Some dwellings parallel with angled side boundaries
		Fencing	<ul style="list-style-type: none"> Low front fencing, typically picket fencing and low masonry walls or combination thereof
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m
66.	Brompton Park 67	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1870s to 1890s Victorian era
		Subdivision Pattern	<ul style="list-style-type: none"> Very narrow long allotments
		Architectural Buildings	<ul style="list-style-type: none"> Single storey, detached and attached, single and double fronted workers' cottages
		Materials	<ul style="list-style-type: none"> Bluestone and sandstone front walls, and red brick sidewalls Render to verandah piers, banding and parapets Corrugated steel roofing in galvanised or paint finish OG guttering in galvanised or paint finish Painted timber to window frames, doors and roof trim Chimneys; brick or painted render
		Roof form	<ul style="list-style-type: none"> Typically, small span steeply pitched gable and hipped 'M' roofs facing the street with ridge perpendicular or parallel to the street Separate verandah to higher front wall or parapet
		Setting and Public Realm	<ul style="list-style-type: none"> Narrow streets with minimal on-site car parking Small setbacks from the street Original shopfronts and hotels to street corners

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Some industrial buildings constructed to street frontages
		Fencing	<ul style="list-style-type: none"> Low front fencing, typically picket fencing and low masonry walls or combination thereof
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m
67.	Blight Street, Ridleyton 68	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> From 1939 Early SA Housing Trust
		Subdivision Pattern	<ul style="list-style-type: none"> Regular rectangular allotments with generous frontage and depth central shared boundary and 3 – 4m side boundary setbacks for driveways
		Architectural Buildings	<ul style="list-style-type: none"> Single storey, ‘early modern’ style, typically semi-detached (duplex) Symmetrical frontage to duplex Variable pattern of duplexes in street Vertical proportions to windows
		Materials	<ul style="list-style-type: none"> Red brick, protruding courses, painted and rendered sections, generally at high level to walls Corrugated steel and tiled roofing Porches either corrugated steel or curved flat concrete canopies Timber framed sunshade awnings with corrugated iron sheet roof; Red brick chimneys Painted timber framed window frames, doors and roof trim
		Roof form	<ul style="list-style-type: none"> Hipped and gabled roofs, with porch a continuation of main roof or separate and awnings over front door and windows Some projecting hipped roofs Shallow roof pitch of 20 degrees maximum

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Setting and Public Realm	<ul style="list-style-type: none"> • Front setbacks typically around 6 – 10 m • Generous setting to each side of duplex
		Fencing	<ul style="list-style-type: none"> • Low open cyclone wire fencing or low tubular steel fencing
		Height	<ul style="list-style-type: none"> • Single storey with ceiling heights around 2.7 – 3.0m
68.	Bell Street, Pennington 68	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> • From 1938 • Early SA Housing Trust
		Subdivision Pattern	<ul style="list-style-type: none"> • Layout reflects 'Garden Suburb' design concept, generally with shared central boundary and 3 – 4m side boundary setbacks for driveways • Strong urban focal points in Sinclair Square and Tulloch Avenue • Regular rectangular allotments with generous frontage and depth central shared boundary and 3 – 4m side boundary setbacks for driveways
		Architectural Buildings	<ul style="list-style-type: none"> • Austere, with late modern style, typically semi-detached (duplex) • Symmetrical frontage to duplex • Variable pattern of duplexes in street • Vertical proportions to windows
		Materials	<ul style="list-style-type: none"> • Corrugated steel roofing and terracotta tile roofing (Bell Street) • Red brick walls with protruding courses, painted and rendered sections, generally at high level to walls • Porches either corrugated steel or curved flat concrete canopies • Timber framed sunshade awnings with corrugated iron sheet roof; • Red brick chimneys • Painted timber framed window frames, doors and roof trim
		Roof form	<ul style="list-style-type: none"> • Hipped and gable roof forms with porches continuous to main roof and separate awnings over windows

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Some projecting hipped roofs Shallow roof pitch of 20 degrees maximum
		Setting and Public Realm	<ul style="list-style-type: none"> Front setbacks typically 6 - 10m Generous setting to each side of duplex
		Fencing	<ul style="list-style-type: none"> Low open cyclone wire fencing or low tubular steel fencing
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights around 2.7- 3.0m
69.	Croydon / West Croydon 69 (North-east of the railway line)	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1890s – 1910s 1910s – 1940s (west of Brown Street, north of Herbert Road)
		Subdivision Pattern	<ul style="list-style-type: none"> Very regular and consistent rectangular allotments, typically 15m+ wide Generous width long allotments Some combined shops and dwelling buildings to Rosetta and Elizabeth Street Generous allotments facing Railway line
		Architectural Buildings	<ul style="list-style-type: none"> Detached character dwellings on generous allotments Edwardian to early Federation Post-Edwardian villas along Day Terrace early bungalow styles, including some Queen Anne, Tudor and Art Deco styles in latter period areas A number of more substantial buildings, particularly fronting the railway line Combined shop/dwellings and rows of shops (Elizabeth Street, Rosetta Street)
		Materials	<ul style="list-style-type: none"> Bluestone, sandstone and redbrick, quoins and window surrounds Red brick and rendered chimneys Bungalows have rendered or brick piers and low walling to verandahs with some tapered piers Corrugated steel and terracotta (latter period) roofing

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Painted timber window frames, doors and roof trim Vertical proportioned timber windows with double sliding sashes Some elaborate decorative elements including painted timber fretwork, cast iron lacework to verandahs, finials, cover battens to gables and decorative barges
		Roof form	<ul style="list-style-type: none"> Hipped, gable and Dutch-gable (gambrel) roofs, 'M' roofs with ridge parallel to street and separate verandahs Some verandahs continuous with main roof line; Typical bungalow verandahs as low height gable frontage Generous roof planes and eaves overhangs to bungalows
		Setting and Public Realm	<ul style="list-style-type: none"> Front setbacks typically 6 – 8 m, typically set in mature gardens Typically tree lined streets particularly Day Terrace with railway line in treed setting Generous side setbacks
		Fencing	<ul style="list-style-type: none"> Woven wire fences with painted timber posts; Painted timber picket fencing reflecting era of associated dwelling Low masonry fencing with simple masonry piers, sometimes with simple iron and steel infill panels (from hume iron to tubular steel variations)
		Height	<ul style="list-style-type: none"> Single storey with generous ceiling and external wall heights of at least 3m
70.	Croydon / West Croydon 69 (South-west of the railway line)	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1890s – 1910s 1940's bungalow style
		Subdivision Pattern	<ul style="list-style-type: none"> Very regular and consistent rectangular allotments, typically 15m+ wide
		Architectural Buildings	<ul style="list-style-type: none"> Villas and symmetrical cottages of variable scale with some later, intrusive infill Some worker's cottages of earlier periods Some bungalow style

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Materials	<ul style="list-style-type: none"> • Bluestone, sandstone and redbrick • Ornate render surrounds to window • Corrugated steel roofing • Red brick and rendered chimneys • Bungalows have rendered or brick piers and low walling to verandahs with some tapered piers • Corrugated steel and terracotta (latter period) roofing • Painted timber window frames, doors and roof trim • Vertical proportioned timber windows with double sliding sashes • Some ornate decorative elements including painted timber fretwork, cast iron lacework to verandahs, finials, cover battens to gables and decorative barges
		Roof form	<ul style="list-style-type: none"> • Hipped and gable roofs, and separate verandahs
		Setting and Public Realm	<ul style="list-style-type: none"> • Front setbacks typically 6 – 8 m • Plane Trees to Euston Terrace
		Fencing	<ul style="list-style-type: none"> • Low masonry and original cast-iron and hume metal fencing • Woven wire fences with painted timber posts; • Painted timber picket fencing reflecting era of associated dwelling
		Height	<ul style="list-style-type: none"> • Single storey with ceiling heights at least 3m
71.	Allenby Gardens 70	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> • 1920s – 1930s
		Subdivision Pattern	<ul style="list-style-type: none"> • Very regular and consistent rectangular allotments, typically 15m+ wide • Some angular allotments due to street pattern and subdivision layout between main roads abounding area

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Architectural Buildings	<ul style="list-style-type: none"> Late Edwardian, Federation and bungalow styles Smaller number of Queen Anne and Tudor style houses Mainly detached housing
		Materials	<ul style="list-style-type: none"> Red brick and sandstone walls; some render Red brick and render chimney Terracotta tiles and corrugated steel roofing
		Roof form	<ul style="list-style-type: none"> Hipped, gable and Dutch gable roofs with decorative gable panelling and timber trim Ridge lines that are mainly perpendicular or parallel to street frontage Federation verandahs continuous with main roof; Some projecting gable forms to street Low height bungalow style gables
		Setting and Public Realm	<ul style="list-style-type: none"> Cohesive character of established detached dwellings with garden settings Front setbacks typically 6 – 8 m Tree lined streets Coombe Road is the natural focus of the area, and includes a school complex of a similar period to surrounding housing
		Fencing	<ul style="list-style-type: none"> Typically, low masonry fencing, sometimes with steel inserts Woven wire fences with painted timber posts; Painted timber picket fencing reflecting era of associated dwelling
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external wall heights at least 3m
72.	Pre-World War One Pennington 71	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1900s to 1920s, some 1940s/50s eastern side Edwardian/Federation/early Bungalow

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Subdivision Pattern	<ul style="list-style-type: none"> Uniform allotment size and street layout Typically, 15+ m frontages with deep allotments
		Architectural Buildings	<ul style="list-style-type: none"> Edwardian, Federation and early bungalows Predominantly detached Typical symmetrical frontage with return verandahs on corner allotments Vertical proportion windows to earlier housing with typical wider and lower bungalow proportion windows
		Materials	<ul style="list-style-type: none"> Red brick, sandstone and render walling, Render or brick chimneys Some pressed metal wall cladding on the fronts Some corrugated iron or small fluted iron cladding on the side walls Terracotta tile and corrugated iron roofing and verandahs Painted timber window frames, doors and roof trim Ornate cast iron to verandahs Turned painted timber verandah posts
		Roof form	<ul style="list-style-type: none"> Steeply pitched Hipped, gable and Dutch gable (gambrel) Some 'M' Roof with ridge parallel to street Some verandahs continuous with main roof Some detached verandahs with typically bullnose profile Generous simple roof planes to bungalow style with less steep roof Low height wide bungalow verandahs
		Setting and Public Realm	<ul style="list-style-type: none"> Front setbacks typically 4 – 7m Helen Street with Mt Carmel School as strong focal point
		Fencing	<ul style="list-style-type: none"> Typically, low masonry, timber picket or wire mesh with timber post fencing Woven wire fences with painted timber posts; Painted timber picket fencing reflecting era of associated dwelling Low small fluted metal fencing with painted timber trim
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights and external walls to at least 3.5m

PART 3 – OVERLAYS			
No.	Reference	Comments	
73.	Pre-World War One – West Hindmarsh 71	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> • 1890s to 1910s • 1930-1940
		Subdivision Pattern	<ul style="list-style-type: none"> • Uniform allotment size and street layout • Typically, 15+ m frontages • Some narrow allotments (Albermarle Street)
		Architectural Buildings	<ul style="list-style-type: none"> • Symmetrical cottages and villas • Some single front cottages • Edwardian, Federation • Early bungalow periods • Predominantly detached
		Materials	<ul style="list-style-type: none"> • Bluestone, sandstone render and red brick walls with chimneys typical of era • Rendered quoins and ornate surrounds to openings • Corrugated iron roofs with verandahs • Ornate painted timber to verandahs including fretwork and turned posts • Ornate cast iron lacework to verandahs • Vertically proportioned windows with painted timber double-sash windows • Square bungalow proportioned three vertical windows in painted timber
		Roof form	<ul style="list-style-type: none"> • Hipped, gable, 'M' and louvre (gambrel) roofs • Separate verandah of monopitch, concave and bullnose form; • Bungalow style verandah with generous width and low pitching height, with masonry piers and low wall • Some original central verandah gable at entrance to symmetrical frontage • Roof pitches vary from bungalow pitch of 20-25 degrees to steeper Edwardian pitch of up to 35 degrees
		Setting and Public Realm	<ul style="list-style-type: none"> • Broad and some narrow tree-lined streets • Front setbacks typically 4 – 7m

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Historic setting of Glanton Street defined by former church Local Heritage Place as focal point
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel inserts, timber picket or wire mesh with timber post fencing.
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external wall heights at least 3- 3.5m
74.	Welland 72	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1910s to 1940s
		Subdivision Pattern	<ul style="list-style-type: none"> Very regular and consistent rectangular allotments, typically 15-18m+ wide Narrow deep allotments to Frederick Street
		Architectural Buildings	<ul style="list-style-type: none"> Late-Edwardian and Federation housing styles Predominantly detached with some early semi-detached housing, some designed to look like one dwelling (Frederick Street) Early bungalows and 1940s Austerity houses Some bungalow makeovers to earlier symmetrical dwellings Some Federation
		Materials	<ul style="list-style-type: none"> Red brick, bluestone and sandstone walls Terracotta tiles, corrugated iron and decorative painted timber trim roofs Painted metal gutters Wall vents at high level between top of verandah and underside of gutter Red brick or render finish chimneys Flat Cantilever concrete canopy sunshades with steel suspension Ornate cast iron to some verandahs Ornate decorative painted timber to some verandahs Painted timber to window and door frames and timber roof trim
		Roof form	<ul style="list-style-type: none"> Hipped, gable and louvre roofs Separate bull nose verandah typically to earlier dwellings 'M' roof forms with ridge parallel to street frontage

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Generous simple bungalow roof planes at shallower pitch to earlier housing with lower height generous width verandah Some verandahs continuous with main roof
		Setting and Public Realm	<ul style="list-style-type: none"> Tree-lined streets Front setbacks typically 6 – 11m
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel inserts, timber picket or wire mesh with timber post fencing.
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external heights at least 3- 3.5m
75.	Woodville South 73	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1910s to 1940s
		Subdivision Pattern	<ul style="list-style-type: none"> Substantial allotments with uniformity of layout and cohesive building appearance and scale, particularly in the 'Glen' Streets and Angus Street Frontages predominantly 15+m
		Architectural Buildings	<ul style="list-style-type: none"> Predominantly bungalow with one wide verandah and Tudor with two main gables and central porch Some Spanish Mission, Dutch Gable and Art Deco houses Predominantly detached
		Materials	<ul style="list-style-type: none"> Freestone, red brick, stucco and baked or glazed brick Tall chimney Exposed ornate timber work Terracotta tiles and some galvanised corrugated iron roofs Tapered and straight masonry piers and low walls to verandahs of bungalows, some with rendered capping to brickwork or rendered masonry Painted timber battens (Tudor curved) to painted panel gables of Tudor and Bungalow Painted timber framed window frames, door frames and roof trim
		Roof form	<ul style="list-style-type: none"> Steep pitched gables associated with Tudor housing and Dutch Gables

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Some villa/bungalow hybrid gables Gable porches Bungalow style verandahs with low height pitching point Some verandah roofs continuous with main roof (bungalow and Spanish Mission) Some flat roofed verandahs set behind arched parapet verandah(Spanish Mission)
		Setting and Public Realm	<ul style="list-style-type: none"> Tree lined streets, well maintained garden setting, particularly facing the street, abundant with mature vegetation Main-focus the landscaped Woodville Oval complex Dwellings fronting Woodville Oval on Oval Avenue and Cedar Avenue are of a larger scale with wider allotments, particularly on corner allotments with Glen streets
		Fencing	<ul style="list-style-type: none"> Fencing generally low brick, stucco or wire and mostly compatible with the era of the associated dwelling Some painted timber fencing with pickets or woven wire
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m Bungalow and Spanish Mission typically of lower wall appearance to the street, with broad frontage
76.	Kilkenny 74	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1850s to 1950s Predominant era is 1920s to 1930s in the north and 1910s to 1920s in the south
		Subdivision Pattern	<ul style="list-style-type: none"> Typically, regular and consistent rectangular allotments 15m+ wide Narrow allotments to Wilpena Terrace, Arkaba Road and Mundulla Street Single front cottages Bungalow dwellings Shop and attached dwelling a strong characteristic in Wilpena Terrace with corner shops and verandahs over footpaths
		Architectural Buildings	<ul style="list-style-type: none"> Edwardian and post-Edwardian cottages in the south Federation and bungalow houses in the north

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> • Small group of Victorian former shops located at the southern end of Wilpena Terrace reflecting the original main street of Kilkenny • High-quality 1930s houses on large allotments at the northern end • Predominantly detached and some attached housing • Semi-Detached dwellings to Wilpena Terrace west of Mundulla Street
		Materials	<ul style="list-style-type: none"> • Freestone and red brick side walls • Red brick quoins • Rendered walling, tapered piers to bungalow verandahs and parapets • Corrugated iron and terracotta tile roofs • Brick or render chimneys with some decoration • Painted timber frame windows and doors with painted timber roof trim
		Roof form	<ul style="list-style-type: none"> • Small scale hipped, gable and louvre roofs typically with ridge line perpendicular to the street • Some 'M' roofs with ridge line parallel to the street • Relatively steeper roof pitch • Generous Bungalow roofing with simple roof plane and generous overhangs • Some federation verandahs continuous with main roof • Some separate bullnose verandahs lower than main wall height • Some central gable to verandah with finial
		Setting and Public Realm	<ul style="list-style-type: none"> • Front setbacks typically 4 – 8m • Some dwellings and former shops constructed closer to front boundaries, especially if located on a corner allotment
		Fencing	<ul style="list-style-type: none"> • Typically, low masonry sometimes with steel inserts, timber picket or wire mesh with timber post fencing.
		Height	<ul style="list-style-type: none"> • Single storey with ceiling heights at least 3m • Some traditional two storey
77.	Woodville Park 75	Heritage Characteristics	Prevailing Characteristics

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Era and/or style of development	<ul style="list-style-type: none"> 1900s to 1950s
		Subdivision Pattern	<ul style="list-style-type: none"> Very regular and consistent rectangular deep allotments, to both sides of the railway line typically 15m+ wide with some narrow allotments to Belmore and Russell Terraces
		Architectural Buildings	<ul style="list-style-type: none"> Generally detached, later symmetrical cottages, Villas, Federation, Queen Anne, Tudor, occasional Austerity and Bungalow styles with some attached housing to suit narrow allotments
		Materials	<ul style="list-style-type: none"> Red brick and freestone walls Galvanised corrugated iron and terracotta roofs Painted timber window frames, doors, roof trim and cover battens to gable panels Some ornate painted timber fretwork and posts to verandahs Brick or rendered masonry chimneys
		Roof form	<ul style="list-style-type: none"> Hipped, gable and louvre roofs with verandahs; Separate verandahs, typically bullnose, across frontages of symmetrical cottages, with many return verandahs not always on corner allotments; Separate verandahs to suit Villa style Steeper roof pitches to earlier styles and Tudor with shallower pitched bungalow roofing; Wide low height verandah frontages to bungalows with gable and half gable styles with masonry piers and low plinth walls; Simple generous roof planes and eaves overhangs to bungalows with main ridge generally parallel to the street; Steeply pitched Tudor gables and verandah gables facing the street
		Setting and Public Realm	<ul style="list-style-type: none"> Fences and front gardens are strong elements. Front setbacks typically 6-10m
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel or cast iron inserts, timber picket or wire mesh with timber post fencing.
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m

PART 3 – OVERLAYS			
No.	Reference	Comments	
78.	Woodville 76	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> • 1880s to 1940s
		Subdivision Pattern	<ul style="list-style-type: none"> • Large deep allotments typically 16m+wide with slightly smaller scale housing south of the railway line • The Stanley Street change in direction results in allotments of lesser depth; • Large corner allotments to Woodville Road • Some narrow allotments to Hughes Street North
		Architectural Buildings	<ul style="list-style-type: none"> • Generally large single-storey detached houses, bluestone Victorian villas, large Federation, Queen Anne and elaborate large bungalow dwellings; • Significantly larger mansions to Woodville Road • Smaller symmetrical cottages with some return verandah and smaller, simple bungalows to Russell Terrace • Semi-detached houses designed to look like one dwelling on Hughes Street North
		Materials	<ul style="list-style-type: none"> • Bluestone, red brick and freestone walls. • Galvanised corrugated iron and tiled roofs • Painted timber window frames, doors, roof trim and cover battens to gable panels • Some ornate painted timber fretwork and posts to verandahs • Brick or rendered masonry chimneys
		Roof form	<ul style="list-style-type: none"> • Relatively more complex hipped, gable and louvre roofs with verandahs; • Separate verandahs, typically bullnose, across frontages of symmetrical cottages, with many return verandahs not always on corner allotments; • Separate verandahs to suit Villa style • Federation style verandahs continuous with main roof • Steeper roof pitches to earlier styles with shallower pitched bungalow roofing; • Wide low height verandah frontages to bungalows with gable and half gable styles with masonry piers and low plinth walls; • Simple, multiple generous roof planes and eaves overhangs to bungalows with main ridge generally parallel to the street;

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Setting and Public Realm	<ul style="list-style-type: none"> Wide, tree-lined streets and large established gardens Front setbacks typically 6 – 12m
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel or cast iron inserts, timber picket or wire mesh with timber post fencing.
		Height	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3-3.5m
79.	Cheltenham East 77	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1880-1940 Small early cottages, Federation through to Bungalow
		Subdivision Pattern	<ul style="list-style-type: none"> Small and variable allotment sizes, typically 13m+ wide Some substantial corner allotments remain
		Architectural Buildings	<ul style="list-style-type: none"> Villas and symmetrical cottages, Federation and bungalows styles Predominantly detached
		Materials	<ul style="list-style-type: none"> Pressed metal, 'stone' front, metal or weatherboard clad, red brick, freestone and sandstone walls Corrugated iron and terracotta tiled roofs Red brick and rendered finish to chimneys Painted timber window frames, doors, roof trim and cover battens to gable panels Generally, less ornate painted timber fretwork and posts to verandahs Some cast iron lacework to verandahs
		Roof form	<ul style="list-style-type: none"> Simple steeply pitched hipped, gable, louvre roof forms and verandas; Some separate and bullnose generally symmetrical with occasional return verandahs not always on corner allotments Bungalow roof forms with simple generous roof planes and eaves overhangs; Some verandahs continuous with main roof; Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls
		Setting and Public Realm	<ul style="list-style-type: none"> Front setbacks typically 4 – 6m with some variation (ie closer)

PART 3 – OVERLAYS			
No.	Reference	Comments	
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel or cast iron inserts, timber picket or wire mesh with painted timber post fencing.
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external wall heights at least 3-3.5m
80.	Cheltenham East 78	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1910s to 1950s
		Subdivision Pattern	<ul style="list-style-type: none"> Typically, wide streets, with large allotments typically 15m+wide
		Architectural Buildings	<ul style="list-style-type: none"> Villas, Post-Edwardian, Federation, Tudor, bungalow and Post War style
		Materials	<ul style="list-style-type: none"> Pressed metal, 'stone' front, metal or weatherboard clad, red brick, freestone and sandstone walls Corrugated iron and terracotta tiled roofs Red brick and rendered finish to chimneys Painted timber window frames, doors, roof trim and cover battens to gable panels Generally, less ornate painted timber fretwork and posts to verandahs Some cast iron lacework to verandahs
		Roof form	<ul style="list-style-type: none"> Hipped, gable and louvre roof forms and verandas Simple steeply pitched hipped, gable, louvre roof forms and verandas; Some separate and bullnose generally symmetrical with occasional return verandahs not always on corner allotments Bungalow roof forms with simple generous roof planes and eaves overhangs; Shallower roof pitches to Post War housing Some verandahs continuous with main roof; Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls
		Setting and Public Realm	<ul style="list-style-type: none"> Residual shops, shops attached to dwellings and community facilities centred around 'main streets' in Buller Terrace, Stroud Street (north and south) and Railway Terrace

PART 3 – OVERLAYS			
No.	Reference	Comments	
			<ul style="list-style-type: none"> Front setbacks typically 6 to 10m
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel or cast iron inserts, timber picket or wire mesh with timber post fencing.
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external wall heights at least 3-3.5m
81.	Henley Beach 79	Heritage Characteristics	Prevailing Characteristics
		Era and/or style of development	<ul style="list-style-type: none"> 1880s to 1940s Transitional styles adopting cross era characteristics
		Subdivision Pattern	<ul style="list-style-type: none"> Regular and consistent rectangular allotments, typically 15m+ wide with a high proportion of narrow and medium width allotments Angled allotments to North Street west of Military Road
		Architectural Buildings	<ul style="list-style-type: none"> Marlborough Street and Crewe Street, south to Clarence Street/Durham Street generally feature smaller but elaborate villas, early Spanish Mission, Federation and bungalows Larger, grand villas, cottages, Tudor and bungalows predominantly along Marlborough Street and East Terrace. South of Atkin Street, bungalows and Tudors
		Materials	<ul style="list-style-type: none"> Red brick walls and freestone facades Corrugated and terracotta tile roofs Painted timber window frames, doors, roof trim and cover battens to gable panels especially Tudor and Bungalow Generally less ornate painted timber fretwork and posts to verandahs Red brick and rendered finish to chimneys
		Roof form	<ul style="list-style-type: none"> Hipped, gable and louvre roof forms and verandas Bungalow roof forms with simple generous roof planes and eaves overhangs; Steeply pitched Tudor roof forms with two main symmetrical gables and central smaller gable porch to street Some verandahs continuous with main roof;

PART 3 – OVERLAYS						
No.	Reference	Comments				
			<ul style="list-style-type: none"> Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls 			
		Setting and Public Realm	<ul style="list-style-type: none"> South of the Bowling Club to Atkin Street, small setbacks 2 to 4 metres South of Atkin Street larger allotments and setbacks of 5 to 8 m Tree lined streets with a large presence of Norfolk Island pines along North Street and East Terrace Vehicle access design and located to preserve existing street trees Some rear lane access 			
		Fencing	<ul style="list-style-type: none"> Typically, low masonry sometimes with steel or cast iron inserts, timber picket or wire mesh with timber post fencing. 			
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external wall heights at least 3-3.5 m 			
82.	Grange 80	Heritage Characteristics	Prevailing Characteristics			
			Grange Road	Beach Street	Jetty Street	Grange Esplanade
		Era and/or style of development	<ul style="list-style-type: none"> Late 1800s to 1950s 	<ul style="list-style-type: none"> Late 1800s to 1950s 	<ul style="list-style-type: none"> Late 1800s in the west, to 1950s in the east 	<ul style="list-style-type: none"> 1880s-1940's
		Subdivision Pattern	<ul style="list-style-type: none"> 600 to 800m2 Allotments typically 14+m wide 	<ul style="list-style-type: none"> 600 to 800m2, allotments typically 14+m wide Some angled allotments west of Military Road 	<ul style="list-style-type: none"> 600 to 800m2, allotments typically 14+m wide Large corner allotments 	<ul style="list-style-type: none"> Varied Elevated allotments
		Architectural Buildings	<ul style="list-style-type: none"> Bungalow, Spanish Mission Symmetrical cottages to Grange Road 	<ul style="list-style-type: none"> Victorian houses and Federation Bungalows Spanish Mission Austerity 	<ul style="list-style-type: none"> Bungalows, cottages and villas Some Austerity 	<ul style="list-style-type: none"> The Marines (State Heritage Place) Grange Hotel (Local Heritage Place)

PART 3 – OVERLAYS						
No.	Reference	Comments				
						<ul style="list-style-type: none"> Federation Dwellings single and double storey elevated Bungalows
		Materials	<ul style="list-style-type: none"> Red brick, painted render and freestone walls Corrugated sheeting and terracotta tile roofs Painted timber window frames, doors, roof trim and cover battens to gable panels Generally less ornate painted timber fretwork and posts to verandahs Red brick and rendered finish to chimneys 	<ul style="list-style-type: none"> Red brick and freestone walls Corrugated sheeting roofs Painted timber window frames, doors, roof trim and cover battens to gable panels especially Tudor and Bungalow Generally less ornate painted timber fretwork and posts to verandahs Red brick and rendered finish to chimneys Curved enclosed verandah form with flat roof 	<ul style="list-style-type: none"> Red brick and freestone walls Corrugated metal sheeting and terracotta tile roofs Painted timber window frames, doors, roof trim and cover battens to gable panels especially Tudor and Bungalow Generally less ornate painted timber fretwork and posts to verandahs Red brick and rendered finish to chimneys 	<ul style="list-style-type: none"> Stone and red brick walls Corrugated iron and terracotta tiled roofs Painted timber window frames, doors, roof trim and cover battens to gable panels Generally less ornate painted timber fretwork and posts to verandahs Brick (sometimes painted) and rendered finish to chimneys

PART 3 – OVERLAYS						
No.	Reference	Comments				
		Roof form	<ul style="list-style-type: none"> • Pitched Hipped, gable with verandahs (continuous and separate) • Bungalow roof forms with simple generous roof planes and eaves overhangs; • Some verandahs continuous with main roof; • Some separate bullnose verandahs and return verandah • Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls 	<ul style="list-style-type: none"> • Pitched Hipped, gable with verandahs (continuous and separate) • Bungalow roof forms with simple generous roof planes and eaves overhangs; • Some verandahs continuous with main roof; • Some separate bullnose verandahs and return verandah • Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls 	<ul style="list-style-type: none"> • Pitched Hipped, gable with verandahs (continuous and separate) • Bungalow roof forms with simple generous roof planes and eaves overhangs; • Some verandahs continuous with main roof; • Some separate bullnose verandahs and return verandah on corner allotments • Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls 	<ul style="list-style-type: none"> • Hipped, gable and louvre roofs • Some verandahs continuous with main roof; • Some separate bullnose verandahs and return verandah on corner allotments • Low height street facing bungalow verandahs with tapered masonry piers and low plinth walls

PART 3 – OVERLAYS						
No.	Reference	Comments				
		Setting and Public Realm	<ul style="list-style-type: none"> • Front setbacks typically 4 – 6 m 	<ul style="list-style-type: none"> • Tree lined streets • Large presence of Norfolk Island pines • Vehicle access design and located to preserve existing street trees 	<ul style="list-style-type: none"> • Large presence of Norfolk Island pines along Jetty Street • Vehicle access design and located to preserve existing street trees 	<ul style="list-style-type: none"> • Seaview Road dominated by rendered retaining walls of varying heights between one to two metres • Presence of Norfolk Island pines • Vehicle access design and located to preserve existing street trees
		Fencing	<ul style="list-style-type: none"> • Typically, low masonry sometimes with steel inserts, timber picket or wire mesh with timber post fencing. 	<ul style="list-style-type: none"> • Predominantly small masonry retaining walls that border the footpath 	<ul style="list-style-type: none"> • Typically, low masonry sometimes with steel inserts, timber picket or wire mesh with timber post fencing. 	<ul style="list-style-type: none"> • Variety of fencing styles or remaining unfenced. • East of Seaview Road, given the retaining walls in this location, low or no fencing appropriate

PART 3 – OVERLAYS						
No.	Reference	Comments				
		Height	<ul style="list-style-type: none"> Single storey with ceiling and external wall heights at least 3-3.5m 	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m 	<ul style="list-style-type: none"> Single storey with ceiling heights at least 3m 	<ul style="list-style-type: none"> The Esplanade a maximum of 3 storeys Along western frontage to Seaview Road a maximum of 2 storeys To the east of Seaview Road a maximum height of 2 storeys
83.	Key Railway Crossings Overlay	<ul style="list-style-type: none"> Applies to eight (8) railway crossings in the CCS. DTS/DPF 1.1 refers to certain distances from railway crossings relative to speed limits, but fails to include 40km/hr roads of which there are a few in CCS. 				
84.	Local Heritage Place Overlay	<ul style="list-style-type: none"> Adjacent parcels identified on the spatial viewer as being in a Local Heritage Place Overlay and therefore identified as a Local Heritage Place. Question the extent of the overlay map layer around Local Heritage Places – seems excessive and will be confusing to the general community. If the intent is to ensure policy consideration made for development adjacent to the Place then consider separate Overlay for land adjacent to Local or State Heritage Places with appropriate policy and note the Commission's update report has acknowledged this issue. Current State and Local Heritage Overlays are missing policy that relates to the adjacent land to be compatible in design to LHP or SHP eg. PDC 7 & 10 under DP, General section, Heritage Places. Recommended policy amendments detailed in RED or as a strike through below: <p><i>Local Heritage Place Overlay Assessment Provisions (AP)</i></p> <p><i>Desired Outcome (DO)</i></p>				

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>DO 1</i> <i>Development maintains the heritage and cultural values of Local Heritage Places through conservation, ongoing use and adaptive reuse.</i></p> <p><i>Built Form</i> <i>PO 1.1</i> <i>The form and location of new buildings and structures maintains the heritage values of the Place.</i> <i>DTS 1.1</i> <i>None are applicable.</i></p> <p><i>PO 1.2</i> <i>Massing, scale and placement of development maintains the heritage values of the Place and retains the visual prominence, principal elevations and views of the Place.</i></p> <p><i>DTS 1.2</i> <i>None are applicable.</i></p> <p><i>PO 1.3</i> <i>Design, architectural detailing and placement maintains the heritage values of the Place.</i> <i>DTS 1.3 None are applicable.</i></p> <p><i>PO 1.4</i> <i>Development is consistent with boundary setbacks and setting.</i> <i>DTS 1.4</i> <i>None are applicable.</i></p> <p><i>PO 1.5</i> <i>Materials and colours are either consistent with or complement the heritage values of the Place without replication.</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>DTS 1.5</i> None are applicable.</p> <p><i>PO 1.6</i> New buildings are not placed or erected between the front <i>and secondary</i> street boundaries and the façades of a Local Heritage Place.</p> <p><i>DTS 1.6</i> None are applicable.</p> <p><i>PO 1.7</i> Development of a Local Heritage Place retains <i>all physical</i> elements contributing to its heritage value.</p> <p><i>DTS 1.7</i> None are applicable.</p> <p><i>Alterations and Additions</i> <i>PO 2.1</i> Alterations and additions complement the subject building and are sited to be unobtrusive, not conceal or obstruct heritage elements and detailing, or dominate the Place or its setting.</p> <p><i>DTS 2.1</i> None are applicable.</p> <p><i>PO 2.2</i> Encourage the adaptive reuse of Local Heritage Places by enabling compatible changes to buildings to accommodate new land uses <i>to facilitate its conservation</i>.</p> <p><i>DTS 2.2</i> None are applicable.</p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>Ancillary Development</i></p> <p><i>PO 3.1</i></p> <p><i>Ancillary development, including carports, outbuildings and garages, complements and does not dominate the heritage values of the Place.</i></p> <p><i>DTS 3.1</i></p> <p><i>None are applicable.</i></p> <p><i>PO 3.2 Ancillary development, including carports, outbuildings and garages, and solar panels is located behind the building line of the principle building(s) sufficient and separated to retain visual prominence.</i></p> <p><i>DTS 3.2</i></p> <p><i>None are applicable.</i></p> <p><i>PO 3.3</i></p> <p><i>Advertising and advertising hoardings should be designed to complement the Local Heritage Place, be unobtrusive, not conceal or obstruct heritage elements and detailing, or dominate the building or its setting and be of a scale and integrated with the building elements of the Place.</i></p> <p><i>DTS 3.3 None are applicable.</i></p> <p><i>Land Division</i></p> <p><i>PO 4.1</i></p> <p><i>Land division creates allotments that:</i></p> <p><i>(a) are compatible with the surrounding pattern of subdivision of the Local Heritage Place; and</i></p> <p><i>(b) are of a dimension to accommodate new development that reinforces and is compatible with the heritage values of the Local Heritage Place.</i></p> <p><i>(c) allows the Local Heritage Place to retain its use and levels of amenity and functional performance.</i></p> <p><i>DTS 4.1</i></p> <p><i>None are applicable.</i></p> <p><i>Landscape Context and Streetscape Amenity</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>PO 5.1 Individually heritage listed trees, parks, historic gardens and memorial avenues retained unless:</i> <i>(a) trees / plantings are, or have the potential to be, a danger to life or property; or</i> <i>(b) trees / plantings are significantly diseased and their life expectancy is short; and in both cases</i> <i>(c) a suitable replacement program is proposed</i></p> <p><i>DTS 5.1 None are applicable.</i></p> <p><i>Demolition</i> <i>PO 6.1</i> <i>Local Heritage Places are not demolished, destroyed or removed in total or in part unless either of the following apply:</i> <i>(a) the portion of the Place to be demolished, destroyed or removed is excluded from the extent of listing that is of heritage value;</i> <i>(b) the structural integrity or condition of the building represents an unacceptable risk to public or private safety and is irredeemably beyond repair.</i></p> <p><i>DTS 6.1</i> <i>None are applicable.</i></p> <p><i>PO 6.2</i> <i>The demolition, destruction or removal of a building, portion of a building or other feature or attribute is appropriate where it does not contribute to the heritage values of the Place.</i></p> <p><i>DTS 6.2</i> <i>None are applicable.</i></p> <p><i>Conservation Works</i> <i>PO 7.1</i> <i>Conservation works to the exterior of a Place match existing materials to be repaired and utilise traditional work methods.</i></p> <p><i>DTS 7.1 None are applicable.</i></p>
85.	Major Urban Transport Routes Overlay	<ul style="list-style-type: none"> • Applies to Port Road, Park Terrace, Tapleys Hill Road and South Road only
86.	Noise and Air Emissions Overlay	<ul style="list-style-type: none"> • Applies to existing Urban Core Zone, Suburban Activity Node Zone, part of R20 Policy Area in Devon Park, part of Woodville Road District Centre Zone and part of Findon District Centre Zone only.

PART 3 – OVERLAYS		
No.	Reference	Comments
87.	<p>Regulated Tree Overlay</p> <p>Assessment Provisions (AP) Desired Outcome (DO) DO 1 PO 1.3 – Pg 2172</p> <p>A tree damaging activity not in connection with other development is undertaken to: (b) mitigate an unacceptable risk to public or private safety due to limb drop or the like;</p>	<ul style="list-style-type: none"> • Should apply to the whole of CCS • Overlay provisions repeated on p.2173 • The term in PO 1.3 ‘unacceptable’ risk has been amended from ‘material’ risk. For discussion from an arboriculture opinion, consider the following - mitigate a high level of risk to public and private safety due to tree defects or the like. • <u>Tree defects includes branch defects, poorly attached branches, dead branches, horizontal branches with excessive branch end weight, poor taper, trunk and root decay, leaning trees, root severance.</u>
88.	<p>State Heritage Place Overlay</p>	<ul style="list-style-type: none"> • Adjacent parcels identified on the spatial viewer as being in a Local Heritage Place Overlay and therefore identified as a Local Heritage Place. Question the extent of the overlay map layer around Local Heritage Places – seems excessive and will be confusing to the general community. • If the intent is to ensure policy consideration made for development adjacent to the Place then consider separate Overlay for land adjacent to Local or State Heritage Places with appropriate policy and note the Commission’s update report has acknowledged this issue. Current State and Local Heritage Overlays are missing policy that relates to the adjacent land to be compatible in design to LHP or SHP eg. PDC 7 & 10 under DP, General section, Heritage Places. • Does not identify all SHPs in the former Brompton Gasworks site. • PO 6.1 (b) refers to “and results from actions and unforeseen events beyond the control of the owner ...” – not sure what this means? • Recommended policy amendments detailed in RED or as a strike-through below: <p><i>State Heritage Place Overlay Assessment Provisions (AP) Desired Outcome (DO)</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>DO 1 Development maintains and enhances the heritage and cultural values of State Heritage Places through conservation, ongoing use and adaptive reuse.</i></p> <p><i>Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria</i></p> <p><i>Built Form</i></p> <p><i>PO 1.1</i> <i>The form of new buildings and structures maintains without domination the heritage values of the Place.</i></p> <p><i>DTS 1.1</i> <i>None are applicable.</i></p> <p><i>PO 1.2</i> <i>Massing, scale and siting of development maintains the heritage values, principal elevations and views of the Place.</i></p> <p><i>DTS 1.2</i> <i>None are applicable.</i></p> <p><i>PO 1.3</i> <i>Design and architectural detailing maintains the heritage values of the Place.</i></p> <p><i>DTS 1.3</i> <i>None are applicable.</i></p> <p><i>PO 1.4</i> <i>Development is consistent with boundary setbacks and setting.</i></p> <p><i>DTS 1.4</i> <i>None are applicable.</i></p> <p><i>PO 1.5</i> <i>New materials and colours are either consistent with or complement the heritage values of the Place, without replication.</i></p> <p><i>DTS 1.5</i> <i>None are applicable.</i></p> <p><i>PO 1.6</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>New buildings are not placed or erected between the front street boundary and the façade of a State Heritage Place and separated to distinguish the described portion.</i></p> <p><i>DTS 1.6</i> <i>None are applicable.</i></p> <p><i>PO 1.7</i> <i>Development of a State Heritage Place retains elements contributing to its heritage value including principal elevations and views of the Place.</i></p> <p><i>DTS 1.7</i> <i>None are applicable</i></p> <p><i>Alterations and Additions</i> <i>PO 2.1</i> <i>Alterations and additions complement the subject building and are sited to be unobtrusive, not conceal or obstruct heritage elements and detailing, or dominate the Place or its setting.</i></p> <p><i>DTS 2.1</i> <i>None are applicable.</i></p> <p><i>Ancillary Development</i> <i>PO 3.1</i> <i>Ancillary development, including carports, outbuildings and garages, complement the heritage values of the Place.</i></p> <p><i>DTS 3.1</i> <i>None are applicable.</i></p> <p><i>PO 3.2</i> <i>Ancillary development, including carports, outbuildings and garages, is located behind the building line of the principal building(s).</i></p> <p><i>DTS 3.2</i> <i>None are applicable.</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>PO 3.3</i> <i>Advertising and advertising hoardings are designed and located to complement the State Heritage Place, be unobtrusive, not conceal or obstruct heritage elements and detailing, or dominate the building or the setting and be of a scale and integration with the elements of the Place.</i></p> <p><i>DTS 3.3 None are applicable.</i></p> <p><i>Land Division</i> <i>PO 4.1</i> <i>Land division creates allotments that:</i> <i>(a) are compatible with the surrounding pattern of subdivision of the State Heritage Place; and</i> <i>(b) are of a dimension to accommodate new development that reinforces and is compatible with the heritage values of the State Heritage Place;</i> <i>(c) do not compromise the setting, use or performance of the Place</i> <i>DTS 4.1 None are applicable.</i></p> <p><i>Landscape Context and Streetscape Amenity</i> <i>PO 5.1 Individually heritage listed trees, parks, historic gardens and memorial avenues retained unless:</i> <i>(a) trees / plantings are, or have the potential to be, a danger to life or property; or</i> <i>(b) trees / plantings are significantly diseased, and their life expectancy is short. and in both case:</i> <i>(c) a suitable replacement program is proposed</i> <i>DTS 5.1 None are applicable.</i></p> <p><i>Demolition</i> <i>PO 6.1 State Heritage Places are not demolished, destroyed or removed in total or in part unless either of the following apply:</i> <i>(a) the portion of the Place to be demolished, destroyed or removed is excluded from the extent of listing that is of heritage value; or</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>(b) the structural condition of the Place represents an unacceptable risk to public or private safety and results from actions and unforeseen events beyond the control of the owner and is irredeemably beyond repair.</i></p> <p><i>DTS 6.1 None are applicable.</i></p> <p><i>Conservation Works</i></p> <p><i>PO 7.1 Conservation works to the exterior of a Place and other features of identified heritage value match existing materials to be repaired and utilise traditional work methods.</i></p> <p><i>DTS 7.1 None are applicable.</i></p> <p><i>Class of Development / Activity (referrals)</i></p> <p><i>Except where:</i></p> <p><i>(i) the development is to be undertaken in accordance with a Heritage Agreement under the Heritage Places Act 1993; or</i></p> <p><i>(ii) the development is, in the opinion of the relevant authority, minor in nature or like for like maintenance and would not warrant a referral when considering the purpose of the referral</i></p> <p><i>the following forms of development:</i></p> <p><i>(a) demolition of internal or external significant building fabric;</i></p> <p><i>(b) freestanding advertisements, signs and associated structures that are visible from a public street, road or thoroughfare that abuts the State Heritage Place;</i></p> <p><i>(c) alterations or additions to buildings that:</i></p> <p><i>(i) are visible from a public street, road or thoroughfare that abuts the State Heritage Place;</i></p> <p><i>may materially affect the context of a State Heritage Place; or</i></p> <p><i>(iv) involve any physical impact to the fabric of significant buildings;</i></p> <p><i>(d) new buildings that:</i></p> <p><i>(i) are visible from a public street, road or thoroughfare that abuts the State Heritage Place; or</i></p> <p><i>(ii) may materially affect the context of the State Heritage Place;</i></p> <p><i>(e) conservation repair works that are not representative of 'like for like' maintenance;</i></p>

PART 3 – OVERLAYS		
No.	Reference	Comments
		<p><i>(f) solar panels that are visible from a public street, road or thoroughfare that abuts the State Heritage Place;</i></p> <p><i>(g) land division;</i></p> <p><i>(h) the removal, alteration or installation of fencing where visible from a public street, road or thoroughfare that abuts the State Heritage Place; or</i></p> <p><i>(i) the removal of an individual tree or a tree within a garden or park of identified heritage significance.</i></p>
89.	Traffic Generating Development Overlay	<ul style="list-style-type: none"> • Applies to land adjacent to all arterial and sub-arterial roads.
90.	Urban Transport Routes Overlay	<ul style="list-style-type: none"> • Seems to apply to ‘higher order roads’ not identified as Major Urban Transport Routes above. <p>DTS/DPF 2.1</p> <ul style="list-style-type: none"> • DTS is confusing as to what is being assessed/approved – wording needs to be refined <p>DTS/DPF 4.1</p> <ul style="list-style-type: none"> • DTS is confusing as to what is being assessed/approved – wording needs to be refined. • Define “Controlled Access Road” • Clarification required around distances to access points. <p>DTS/DPF 5.1</p> <ul style="list-style-type: none"> • Clarify whether parked vehicles should be taken into consideration when assessing sight distances or only permanent objects.
91.	EPA Licensed Overlay	<ul style="list-style-type: none"> • Consider an EPA licensed Overlay to show the noise and odour buffers. The Overlay will provide assessment guidance on current licensed areas.

PART 4 – GENERAL DEVELOPMENT POLICIES			
No.	General Section Heading	Policy Reference	Comments
92.	Design in Urban Areas	All Development, External Appearance, PO 1.3	<ul style="list-style-type: none"> • Should be reworded so group dwellings are included in its intent re. design facing the street. • There should be a DTS diagram to support the PO to show a minimum accepted standard to represent the built form to the street. • DTS/DPF 21.1 requiring 'soft landscaping – sometimes the quantifiable requirement for soft landscaping exceeds the quantifiable requirements for private open space as expressed in Table 1 – Outdoor Open Space. • DTS/DPF 33.5 and 34.2 refer to DTS 34.3, which does not exist. • Formatting and numbering error in relation to DTS/DPF 40.1. • Table 1 – Outdoor Open Space requirements are very similar to current DP, except does not include site area <200m² (which also includes POS requirement for PA 20). • The following comments have been provided through Council's Assessment Panel for consideration: <ul style="list-style-type: none"> • Council's Assessment Panel has raised concerns that the current Development Plan provisions do not discourage windows and balconies in high density forms of development from being located on boundaries of sites. It is recommended that such provisions are considered for inclusion within the Planning and Design Code. • Provisions should be considered that support appropriate built form outcomes in proximity to large trees that facilitate easier maintenance of leaf litter and in turn reduces the likelihood of trees being removed. • Consideration should be given to include clear support for new provisions associated with providing soft landscape and tree planting deep root zones with at least one tree per dwelling in the draft Planning and Design Code when Council makes its submission to ensure tree canopy delivery is not just limited to public spaces in future development. <p>Multiple dwellings:</p>

			<ul style="list-style-type: none"> The draft Code is considered to be silent on design policy for multiple dwellings. The draft Code provides an opportunity to include improved design policies around multiple dwelling proposals. These considerations may include, but not be limited to car parking standards, living area spaces and amenities.
93.	Design in Urban Areas	Residential Development – 3 Building levels of Less, Landscaping, PO 21.1, PO 21.2 and PO 21.3, pages 2240, 2241	<ul style="list-style-type: none"> As interpreted the required area for soft landscaping is greater than the open space proposed in Table 1 for outdoor open space on page 2253. The % of soft landscaping should relate to the area of open space sought and not the site area. For a site <300 which is seeking 24m² (15% for soft landscaping is only 3.6m²). Seems not enough permeable space.
94.	Design in Urban Areas	Residential Development – 3 Building levels of Less, PO 19.1 – Overlooking Visual Privacy	<ul style="list-style-type: none"> Part d) seeks balconies where it will face a primary street or public reserve, yet typically residential flat buildings or group dwellings will have designs that allow for balconies to the rear or sides. These are acceptable provided they have screening to protect adjoining properties.
95.	Housing Renewal		<ul style="list-style-type: none"> Note that RSA/Community Housing development only needs to satisfy these provisions (and not the zone, overlay or other General section provisions). PO 1.2 and 2.1 refer to ‘medium rise’ RFBs, which is defined as 3-6 storeys (although DTS/DPF 2.1 specifically refers to a maximum of 3 levels/12m). Procedural matters (PM) exempts all development undertaken by SAHT/Community Housing provider from notification except RFBs of 3 storeys or greater. What about other housing types 3 storeys or greater?
96.	Infrastructure and Renewable Energy Facilities		<ul style="list-style-type: none"> Telecommunications Facilities, page 2293 -A resolution of Council dated 2019, seeks that the draft Code includes policy that considers telecommunications facilities (mobile phone towers) to be deemed as “restricted development” within the proposed Suburban Neighbourhood Zone and areas contained within the Historic Area Overlay. This will enable a more rigorous assessment for development of this nature within residential character areas in the City of Charles Sturt.
97.	Land Division in Urban Areas		<ul style="list-style-type: none"> DO 1 has incorrect numbering (lettering?) system. PO 5.2 and DTS 5.2 relate to ‘stormwater management’ but are positioned under the ‘Open Space’ sub-heading. PO 10.1 is missing the word ‘development’ after the words ‘energy efficient’.

98.	Open Space and Recreation	Part 4 – General Development Practices DO 1 – Page 2317	<ul style="list-style-type: none"> Support the desired outcome in general terms, although consideration should be given to including ‘sport’ in this definition, as usually, larger areas are required to facilitate these activities. This will differentiate it from active recreation, which is separate from organised sport.
99.	Open Space and Recreation	Part 4 – General Development Practices PO 2.1, 2.2 and 3.1 – Page 2317 PO 8.2 – pg 2319	<ul style="list-style-type: none"> Suggest expanding reference to pedestrian and cycling by including ‘cycling and other personal modes of transport’ could be made where ‘pedestrian’ is mentioned. This suggestion considers the rise in use of e-scooters and other emerging technologies. https://sport.vic.gov.au/our-work/participation/active-recreation
100.	Open Space and Recreation	PO 4.1 – page 2318	<ul style="list-style-type: none"> Delete the words ‘active and passive recreational’ and just have the word ‘intended use’ here.
101.	Open Space and Recreation	PO 5.1	<ul style="list-style-type: none"> Include the words ‘adjacent roads and footpaths’. <u>CPTED guidelines for Queensland:</u> https://www.police.qld.gov.au/sites/default/files/2018-08/CPTEDPartA.pdf
102.	Open Space and Recreation	PO 5.2	<ul style="list-style-type: none"> Include ‘a suitable distance from vehicle traffic and other hazards’. <u>Guidelines for school playgrounds, Dept. of Education & Early Childhood Development (Vic)</u> https://www.education.vic.gov.au/Documents/school/principals/infrastructure/schoolplaygroundguide.p df
103.	Open Space and Recreation	PO 6.1 – page 2319	<ul style="list-style-type: none"> The words ‘clear orientation’ are a bit confusing. Perhaps just say ‘clear information regarding’.
104.	Open Space and Recreation	PO 7.3	<ul style="list-style-type: none"> Suggest replacing the words ‘hard paved’ to ‘impervious’.
105.	Open Space and Recreation	PO 7.4	Agree with this Performance Outcome and suggest it could be expanded into DO 1 for all open space – i.e. all development in public open space should have regard to the purpose, management and amenity of the open space / reserve.

106.	Site Contamination	DTS/DPF 1.1 DO1(pg 2321) DTS/DPF 1.1 C)	<ul style="list-style-type: none"> the text in part (c) seems superfluous. Suggest deleting the words “in respect of which the applicant is able to furnish, or the relevant authority is in possession of” Suggest adding the word “reasonably” preceding “suspected” to change clause to read “Protection of human health and the environment wherever site contamination has been identified or is REASONABLY suspected to have occurred.” Suggest adding a clause to state “and no contaminating activity was undertaken on the land in the period since the report was produced “
107.	Transport, Access and Parking		<ul style="list-style-type: none"> The text “the number of employees” under DTS/DPF 9.3 is a typo. Table 2 – Off-Street Vehicle Parking Requirements in Designated Areas, under the heading ‘Residential Development’ only refers to ‘Residential flat building’ whereas it probably should refer to all dwellings. Page 2333, under Table – Off-Street Vehicle Parking Requirements in Designated Areas has two exclusions for tourist accommodation. <u>General Development Policy: Transport, Access and Parking. Vehicle Access, [PO + DTS/DPF 3.5] p2324</u> The reference to <i>mature</i> street trees should be removed and the clauses should refer to street trees in general to minimise street tree loss. Suggest the following DTS be added to ensure that if the removal of street trees cannot be avoided that there is no net loss: If the removal of a street tree is unavoidable a replacement street tree of at least Xm is to be planted at a location agreed by Council. <u>General Development Policy: Transport, Access and Parking, Vehicle Access, [DTS/DPF 3.6] p2324</u> The maximum access point widths are strongly supported to reduce the pressure on competing uses of verge area (ie greening, waste presentation area, cross-overs etc.) All policies under this section that relate to general vehicle movements, sightlines, widths, impacts on infrastructure should apply to all dwellings in the assessment pathways.
108.	Waste Management	General Development Policy: Design in Urban Areas – Waste Storage -	<ul style="list-style-type: none"> Support the improvements to waste storage areas, location and path of travel, however these policies should apply to all dwellings in the assessment pathways.

	Waste Management	<u>General Development Policy: Design in Urban Areas – Waste Storage [DTS/DPF 24.1] (p2244), General Development Policy: Design in Rural Areas – Waste Storage [DTS/DPF 18.1] (p2264), General Development Policy: Housing Renewal – Waste [DTS/DPF 16.1] (p2280)</u>	<ul style="list-style-type: none"> • These clauses are supported with amendment. • To ensure that waste management is considered early in the design process and to minimise amenity impacts, path of travel should not be through a dwelling – suggest the following amendment to part b of this clause: • <i>A continuous unobstructed path of travel, which is not through a dwelling, with a minimum width of 800mm between the waste bin storage area and the street</i>
	Waste Management	<p>General Development Policy: Design in Urban Areas – Waste Storage [PO 24.1] (p2244)</p> <p>General Development Policy: Design in Rural Areas – Waste Storage [PO 18.1] (p2264)</p>	<ul style="list-style-type: none"> • To ensure that expected waste volumes are considered in the design of waste and recycling storage areas for higher density developments, this intent should be transferred from the current Development plan – suggest the following amendment: • Provision is made for adequate and convenient storage of waste and recycling bins in a location screened from public view.

		General Development Policy: Housing Renewal – Waste [PO 16.1] (p2279)	
	Waste Management	<p>General Development Policy: Design in Urban Areas – Waste Storage [PO 35.4, DTS/DPF 35.4] (p2249)</p> <p>[PO 39.5, DTS/DPF 39.5] (p2251)</p> <p>General Development Policy: Design in Rural Areas – Waste Storage [PO 24.4, DTS/DPF 24.4] (p2267)</p>	<ul style="list-style-type: none"> • To avoid amenity (particularly odour) impacts from waste storage areas on non-residential land use (such as mixed use or abutting commercial uses) – suggest the following amendments: • PO: Waste and recyclable material storage areas are located away from dwelling and commercial buildings • DTS/DPF: Dedicated waste and recyclable material storage areas are located at least 3m from any habitable room window and commercial outdoor dining areas.
	Waste Management	General Development Policy: Design in Urban Areas – Waste Storage [PO 35.5] (p2249) [PO 39.6] (p2251)	<ul style="list-style-type: none"> • The addition of a clause to address limited verge space for bin presentation for higher density developments is supported with amendment. • The following amendment is suggested to clarify that the on-site collection can refer to waste collection truck access and/or a pull-in pull-out arrangement for bulk bins:

		General Development Policy: Design in Rural Areas – Waste Storage [PO 24.5] (p2267) [PO 28.6] (p2268)	<ul style="list-style-type: none"> Provision is made for on-site waste and recycling collection vehicles to enter and leave the site without reversing where bins from 10 or more dwellings are to be collected at any one time, as required, or provision is made for on-site collection vehicle access and/or a “pull-in” pull-out” collection service for bulk bins.
	Waste Management	Zones in general	<ul style="list-style-type: none"> It seems that zones do not trigger waste management requirements for non-residential developments (ie consulting rooms, office, preschool, shop in the General Neighbourhood Zone). Although Councils are generally not responsible for providing a waste service to these types of developments waste management requirements still need to be considered at the planning stage to ensure that a collection service will be possible and waste facilities and storage area adequate. Suggest that clauses similar to General Development Policy: Design in Urban Areas DTS, PO 35.3-35.5 are applied to these types of development.
	Waste Management	General Development Policy: Design in Urban Areas General Development Policy: Design in Rural Areas	<ul style="list-style-type: none"> Principle (1) from General Section, Waste (p92 of Charles Sturt Development Plan) from the Current Development Plan (replicated below) does not seem to have been transferred to the Draft Code. <p>Development Plan, General Section – Waste</p> <p>Principles of development Control</p> <p><i>1. Development should be sited and designed to prevent or minimise the generation of waste (including wastewater) by applying the following waste management hierarchy in the order of priority as shown below:</i></p> <p><i>(a) avoiding the production of waste</i></p> <p><i>(b) minimising waste production</i></p> <p><i>(c) reusing waste</i></p> <p><i>(e) recovering part of the waste for re-use</i></p> <p><i>(f) treating waste to reduce the potentially degrading impacts</i></p> <p><i>(g) disposing of waste in an environmentally sound manner</i></p>

			<ul style="list-style-type: none"> • The careful management of waste as a resource is essential and aligns with the Government of South Australia's action to develop a circular economy. • Suggest that the principle (1) mentioned above is transferred to the draft code General Development Policy areas: Design in Urban Areas and Design in Rural Areas.
--	--	--	--

109.	Site Facilities	<p>General Development Policy: Design in Urban Areas – Group dwellings, residential flat buildings and battle-axe development, PO 35.2 (p2249)</p> <p>General Development Policy: Design in Urban Areas – Supported accommodation, housing for aged persons, and people with disabilities, PO 39.3 (p2251)</p> <p>General Development Policy: Design in Rural Areas – Group dwellings, residential flat buildings and battle-axe development, PO 24.2 (p2266)</p>	<ul style="list-style-type: none"> • These clauses are supported with amendment. • The provision of suitable external clothes drying facilities should be extended to all dwelling types, so this can be included in a development from the design stage and reduce the need for artificial clothes drying and the additional energy costs and greenhouse gas emissions that would result.
------	-----------------	---	--

		General Development Policy: Design in Rural Areas – Supported accommodation, housing for aged persons, and people with disabilities, PO 28.3 (p2268)	
--	--	--	--

110.	Universal Design	General Development Policy: Design in Urban Areas – Residential Development – 4 or More Building Levels (including serviced apartments) [PO28.5] (p2246)	<ul style="list-style-type: none"> • This clause is strongly supported with amendment. • The scope of this clause should be expanded to apartments that are less than 3 building levels to increase the number of accessible dwellings due to data from the <i>Liveable Housing Design Guidelines</i> that show it is 22 times more efficient to build in these design features rather than retrofitting them at a later stage, and that there is a 60% chance of a home being occupied by someone living with a disability. • It is suggested that a suite of minimum requirements for effective measures are specified to provide clear guidance for design and assessment. • Accessibility has been addressed in this manner in the Victorian Planning Scheme – Particular Provisions 55.07-7 and 58.05-1 for all apartments. A similar approach with a Practice Note would be supported for the draft Code. • <u>Example/Reference:</u> • Liveable Housing Australia, <i>Liveable Housing Design Guidelines</i>: • http://www.livablehousingaustralia.org.au • <u>Victoria State Government, Planning Schemes Online, Particular Provisions 55.07-7:</u> • https://planning-schemes.delwp.vic.gov.au/schemes
111.	Environmental Performance	<p>General Development Policy: Design in Urban Areas – Environmental Performance [PO 4.1-4.3] (p2229)</p> <p>General Development Policy: Design in</p>	<ul style="list-style-type: none"> • Clauses for energy efficiency and climate responsive buildings are strongly supported with amendments. • Clauses 4.1-4.3 apply to a limited number of dwelling types (detached dwelling (battle-axe), group dwelling and residential flat) but does not include detached, semi-detached or row under performance assessed and is also silent under assessment for deemed to satisfy. Due to the significant increase and upward trend in semi-detached, row/terrace houses and townhouses (ABS), the need to respond to climate change impacts, increase amenity + wellbeing of occupants, the application of environmental performance should be expanded to include all dwelling types. • These clauses should also be expanded due to the high proportion of rentals for these dwelling types (43% compared to 18% for detached dwellings) (Leishman et al, 2019) – in these cases there is generally

		<p>Rural Areas – Environmental Performance [PO 4.1-4.3] (p2256)</p>	<p>less ability for tenants to influence the environmental performance and amenity of their dwellings. It should also be a requirement for pre-schools.</p> <ul style="list-style-type: none"> • Practice notes should be provided for clauses 4.1-4.3 to assist with development design and assessment and to identify best practice benchmarks – such as those provided for the Sustainable Design Assessment in the Planning Process (SDAPP) used in Victoria (see City of Yarra link), the Australian Government Your Home guide and the material produced by the South Australia Government as part of their Energy Advisory Service. • If best practice and targets are not defined the design and assessment process become guess work. The best practice and target should be based on achieving benefits above business as usual and to contribute to broader targets such as South Australia’s greenhouse emissions reduction target under the <i>Climate Change and Greenhouse Emissions Reduction Act 2007</i> and climate commitments of the <i>Directions for a Climate Smart South Australia</i>. • A whole of building assessment tool should be developed or modified (such as BASIX or the Victorian Built Environment Sustainability Scorecard (BESS)) to provide a holistic approach to sustainability and with minimum performance standards embedded in the tool to indicate an effective suite of measures. • <u>Example/Reference:</u> • Leishman, C., Baker, E. (2019) <i>Audit of South Australia’s current housing assets and mapping of future demand</i>, AHURI Research Paper, Australian Housing and Urban Research Institute Limited, Melbourne, https://www.ahuri.edu.au/research/research-papers/audit-of-south-australia-current-housing-assets-and-mapping-of-future-demand • ABS, Census of Population and Housing, 2011 and 2016 • www.abs.gov.au • Australian Government, 2013, <i>Your Home: Australia’s guide to environmentally sustainable homes</i> • www.yourhome.gov.au/passive-design/design-climate • City of Yarra, Environmentally Sustainable Design in Planning
--	--	---	---

			<ul style="list-style-type: none"> • www.yarracity.vic.gov.au/services/planning-and-development/planning-applications/environmentally-sustainable-design-in-planning • Clause 4.1 is supported with amendments. • A DTS is suggested for clause 4.1 to assist with development design and assessment – such as: Dwelling placement, orientation and layout to maximise solar access to living areas and private and communal open space which should be positioned on the north side of buildings. Appropriate external shading provided to west, east and north facing windows to minimise solar heat gain and allow in winter sun. Effective cross-ventilation and passive cooling through window placement and openings. • It is suggested that guidance is provided for creating effective cross ventilation in apartments to ensure that this can be provided in dwelling types where this can be a challenge. It is suggested that a table is included in the draft Code like clause 55.07-15 of the Victorian Planning Scheme. This should be accompanied by a practice note like the Victoria State Government, <i>Better Apartments Design Standards</i>. • Guidance notes should also be developed for effective shading such as eave widths and effective shading devices for the various orientations. • <u>Example/Reference:</u> • <u>Victoria State Government, Planning Schemes Online, Particular Provisions 55.07-15</u> • https://planning-schemes.delwp.vic.gov.au/schemes • Victoria State Government, December 2016, <i>Better Apartments Design Standards</i> • https://www.planning.vic.gov.au/policy-and-strategy/better-apartments • Clause 4.2 is supported with amendments. • Good passive design and seeking to reduce mechanical heating and cooling systems is supported due to the environmental and social benefits of a high performing building envelope and heating and cooling
--	--	--	--

			<p>being the biggest single contributor to average energy use in Australian homes (40%) (Government of South Australia, 2019) and its contribution to peak demand.</p> <ul style="list-style-type: none"> • It is suggested a DTS 4.2 is included to indicate how this clause could be achieved and assessed. A preliminary energy performance assessment should be requested to illustrate how this clause will be achieved. This can lead to better design outcomes and it is more cost effective to consider the performance of the building envelope at the planning stage rather than retrofitting at a later stage (Harrington, P, 2013). The DTS should also specify that, where required, heating and cooling systems should be energy efficient. This should be guided by an energy efficiency practice note that outlines efficiency options. • Examples of this approach in planning are: the SDAPP process in Victoria (see the BESS tool note – Energy) where preliminary NatHERS assessments are encouraged for all dwelling types (this is recognised as an improvement from half a star above the minimum requirement); the City of Fremantle’s Local Planning Policy 2.2 requires that developments in some areas provide a NatHERS star rating at the development application stage that demonstrates one star rating above the current energy efficiency requirements of the Building Code of Australia for class 1A building. • Passive environmental performance through PO 4.1 and an improved thermal envelope (through PO 4.2) is supported as the climate zones of the Adelaide urban area and surrounds allow for the achievement of 8-10 star NatHERS ratings through ‘simple design considerations’ and ‘offers the most cost effective opportunities to achieve carbon zero or positive outcomes’ (Australian Government, 2013) • <u>Example/Reference:</u> • <u>Harrington, P, November 2013, <i>Environmentally Efficient Design Planning Policies – Cities of Banyule, Moreland, Port Phillip, Stonnington, Whitehorse and Yarra: expert evidence – benefit cost analysis</i></u> • <u>www.maddocks.com.au/expertreports/</u> • <u>Government of South Australia, 10 October 2019, Home Energy Use</u> • <u>https://www.sa.gov.au/topics/energy-and-environment/using-saving-energy/home-energy-use</u> • Built Environment Sustainability Scorecard • <u>https://bess.net.au/tool-notes/</u>
--	--	--	---

		<ul style="list-style-type: none"> • City of Fremantle, Local Planning Policy 2.2: Split Density Codes and Energy Efficiency and Sustainability Schedule • www.fremantle.wa.gov.au/development/planning-policies#LPPS • Clause 4.3 is supported with amendments. • Suggest the following amendment: • <i>Buildings incorporate climate resilient and climate responsive techniques and features such as building and window orientation, materials, use of eaves, verandahs and shading structures, water harvesting, at ground landscaping, green walls, green roofs and photovoltaic cells.</i> <p>Issues</p> <ul style="list-style-type: none"> • Materials should be included in the clause due to the significance of the use of appropriate materials – particularly roofs – to reduce urban heat islands and heatwave impacts. The <i>Western Adelaide Urban Heat Mapping Project Report</i> found that dark roofs have a warming effect of 2.8°C more than the average surface temperature, while white roofs have a cooling effect of 2.3°C. The report recommends that white roofs be encouraged in residential and industrial areas. <p>Benchmark required</p> <ul style="list-style-type: none"> • The Green Building Council of Australia, Green Star Design and As Built credit Heat Island Effect aims for projects to reduce their contribution to this issue through at least 75% of the site covered in one or more of the following: vegetation, green roof, shading, and roof materials and hardscape elements with an appropriate solar reflectance index. As an example, if this were to be applied to the General Neighbourhood Zone - where the roof can cover up to 60% of the site – it indicates that the roofing materials/treatment would need to be considered to reduce the site’s impact on the urban heat island. • A DTS 4.3 is suggested – such as: Development accompanied by an environmental design plan that through materials, design and site elements reduces climate hazards, is climate responsive and improves comfort and energy efficiency, including roofs with a low solar absorptance. Significant developments to provide a climate change adaptation plan. <ul style="list-style-type: none"> • Definition + practice note required
--	--	---

			<ul style="list-style-type: none"> • The Code should have a definition for climate responsive buildings, including that the design responds to local weather patterns and conditions to create comfortable and healthy buildings that minimise environmental impacts. • A practice note should be developed to illustrate how building design can address the various climate change hazards, including heatwaves to assist applicants and those assessing development applications. <p>Climate resilience</p> <ul style="list-style-type: none"> • Developments would need to address the particular hazards that are of relevance to their location. This would also assist with the suggested preparation of a climate change adaptation plan for larger and significant developments to ensure that resilience is built-in to cope with current and future climate change scenarios – the Green Building Council of Australia’s Green Star Design and As Built, Adaptation and Resilience credit is one example of how this could be addressed. • The Resilient Hills and Coasts project, <i>Where we Build What We Build</i>, (with project partners the Insurance Council of Australia and the Government of South Australia), explored insurance premiums to encourage more climate resilient development and found that South Australia’s insurance premiums for housing are higher than Victoria and closer to Queensland’s due to SA hazard mapping not being as complete. • Continual improvements to the planning hazard mapping and vegetation layers and the integration of an urban heat mapping layer in the Code is strongly supported to help inform urban cooling and greening measures, climate change hazards reduction and improvements over time. • <u>Example/Reference:</u> • <u>Seed Consulting Services, August 2017, Western Adelaide Urban Heat Mapping Project</u> • <u>https://www.westtorrens.sa.gov.au/CWT/content/Environment/Climate_change/Urban_heat_mapping</u> • <u>Urban Trees and People’s Yards Mitigate Extreme Heat in Western Adelaide, final summary report, Macquarie University, December 2019.</u> • <u>Green Building Council of Australia, Green Star Design and As Built Submission Guidelines, Adaptation and Resilience Credit</u> • <u>https://new.gbca.org.au/</u>
--	--	--	---

112.	Water Sensitive Design	General Development Policy: Design in Urban Areas – Water Sensitive Design [PO + DTS 22.1-22.3] (p2241-2243)	<ul style="list-style-type: none"> • These clauses are supported (including the rainwater tank volume requirements and minimum site perviousness) with amendments. • They are particularly supported due to the ability to demonstrate and assess the effectiveness of proposed development design through tools and guidance material that have already been developed by Water Sensitive SA including the Insite Water Tool. • PO + DTS 22.2 and PO + DTS 22.3 apply to 5-19 dwellings. Strongly suggest that these two clauses are changed to apply to 5 or more dwellings to ensure that developments are mitigating their stormwater and waterway impacts, that potable water use is reduced and cooling opportunities are integrated into the design. • What are the requirements for 1-4 dwellings? These applications should also follow best practice methods for use of stormwater. • Major Land Division (20+ allotments) pg 2304 • PO + DTS 9.1 does not reference rainwater tanks as mentioned in 22.1 etc. The Stormwater Management Plan needs more criteria or reference to external sources (see below comments). • <u>Water Sensitive SA, Insite Water</u> • <u>www.watersensitivesa.insitewater.com/</u>
113.	Water Sensitive Design	General Development Policy: Design in Urban Areas – Water Sensitive Design [PO + DTS22.1-22.3] (p2241-2243)	<ul style="list-style-type: none"> • DTS (a)(iv) <i>the roof is at least 80% of the impervious area;</i> • along with DTS 22.2 only applying to 5-19 dwellings excludes a large number of developments from having a benchmark or requirement for water sensitive design as it would be limited to PO 22.1.

- | | | | |
|--|--|--|--|
| | | | <ul style="list-style-type: none">• The <i>Guide to the Draft Planning and Design Code – Rural and Urban Council Areas</i> indicates that ‘A |
|--|--|--|--|

			<p>General Neighbourhood Zone will apply to approximately 80% of residential areas' (p43).</p> <ul style="list-style-type: none"> • The General Neighbourhood Zone (GNZ) specifies the following for site coverage: DTS/DPF 3.1 - <i>The development does not result in a total roofed area (excluding eaves of a building) on the site exceeding 60%.</i> • If we apply the maximum roof area of the GNZ along with the soft landscaping/perviousness requirements and assume the remainder as allowed for impervious surfaces, the roof as % of the impervious area is less than 80% (as low as 60%. See table below) for dwelling site areas under 400m². To provide an effective measurement for design and assessment and to maximise the benefits of water sensitive design, suggest that DTS/DPF 22.1 includes this clause: • <i>The roof is at least 60% of the impervious area.</i> <p>GNZ example – roof as % of impervious area</p> <ul style="list-style-type: none"> • Any application which lies outside of 22.1 should include a Stormwater Management Plan to provide evidence of following best practice methods in accordance with SA Water Sensitive Design Policy – InSite Water User Manual. • <i>ii. connected to all toilets and either the laundry cold water outlets or hot water service;</i> • Suggestion to mention 'usage of rainwater' not just 'connected'. • General Development Policy: Design in Urban Areas – Water Sensitive Design • [PO + DTS5.1] • (p2227) • The quality of surface and groundwater is not explained in enough detail. A natural hydrological system relates to more than just the water and the ground, this relates to flora and fauna as well. A note about the quality of flora and fauna species needs to be mentioned. <p>Design in Urban Areas – All non-residential development</p> <ul style="list-style-type: none"> • PO 41.2 (pg 2252) • <i>Water discharged from a development site to be of a physical, chemical and biological condition equivalent to or better than its pre-developed state.</i> • There should be a natural filtration process included – rain garden (or similar) to filter discharged water before it is released from the site. • GENERAL NOTES • PO and DTS/ DPF number referenced is incorrect for Water Sensitive Design.
--	--	--	---

			<ul style="list-style-type: none"> • How are these requirements checked/ regulated/ managed? • Most of the Code is too vague. Terms like 'minimise' is not acceptable to review against. • The definition of 'perviousness' is not defined. Things like artificial turf should not be considered as 'pervious' as mentioned in the definition in 'soft-landscaping'. • Private Open Space should be related to Water Sensitive Design. • Private Open Space should be a larger percentage of the site than pervious areas only if sheds, paving, balconies, eaves etc are included as Private Open Space • DTS 4.2 pg 270 • (c) (i) D. (and other areas of the code) • mentions 25% min private open space for at least 50% of dwellings is not acceptable. • Should be min 25% for ALL dwellings and of that 25%, at least 15% should be green space.
114.	Landscaping	General Development Policy: Design in Urban Areas – Landscaping, [DTS/DPF 21.1], (p2240)	<ul style="list-style-type: none"> • This clause is supported. • Suggest definition of road boundary be included for part b of this clause for clarity, as it is assumed that it refers to the land between the primary building and the site boundary and does not include the footpath and verge. • Suggest that a definition is added for deep soil zone, which should include that it is an area of natural ground which excludes areas where there is a structure underneath.
115.	Landscaping	General Development Policy: Design in Urban Areas – Landscaping, [PO + DTS/DPF 21.2], (p2240-41)	<ul style="list-style-type: none"> • This clause is strongly supported but needs to apply to all dwelling types. • This clause should be accompanied by a practice note to assist with tree placement and species selection to guide tree planting. A useful example is the approach by the City of Sterling, WA, who also require a certain number of trees to be planted – and have developed <i>Trees and Development Guidelines</i>. <p>References:</p> <ul style="list-style-type: none"> • City of Sterling, <i>Trees and Development Guidelines</i> • https://www.stirling.wa.gov.au/waste-and-environment/trees/trees-and-development
116.	Landscaping	General Development Policy: Design in Urban Areas – Landscaping	<ul style="list-style-type: none"> • These clauses are strongly supported with amendment. • Suggest that in cases where the garages and building entry doors make up the majority of the area adjacent a common driveway (DTS/DPF 23.1) and where the common driveway is located directly adjacent the side or rear boundary that instead of applying DTS/DPF 23.1, the soft landscaping required

		<p>[PO + DTS/DPF 34.1, 34.2]</p> <p>General Development Policy: Design in Rural Areas – Landscaping [PO + DTS/DPF 23.1, 23.2]</p>	<p>by DTS/DPF 23.2 have a minimum dimension of 2m to provide for significant landscape area that can also contribute to cooling.</p>
117.	Landscaping	<p>General Development Policy: Design in Urban Areas. All Development – 4 or more building levels: Landscaping [PO + DTS/DPF 10.1, 10.3, 10.4] (p2233-2234)</p>	<ul style="list-style-type: none"> • These clauses are strongly supported.

118.	Landscaping	General Development Policy: Design in Urban Areas. All Development – 4 or more building levels: Landscaping [PO + DTS/DPF 10.2] (p2233-2234)	<ul style="list-style-type: none">This clause is supported with amendment.The example scenarios below show that there could be some confusion about number of trees required when the number required is not a whole number. For example, the second example scenario shows that 1.5 trees are required for 45.5m² of deep soil area. This should require 1 medium tree and 1 small tree for the minimum deep soil area calculated. <p>Example scenarios</p> <table><tr><td>Site area</td><td colspan="4">350m²</td></tr><tr><td></td><td>Deep soil area m²</td><td>No. trees</td><td>Tree size</td><td>Height</td></tr><tr><td>P+D Code</td><td>24.5</td><td>0.8</td><td>Medium</td><td>6-12m</td></tr><tr><td>Site area</td><td colspan="4">650m²</td></tr><tr><td></td><td>Deep soil area m²</td><td>No. trees</td><td>Tree size</td><td>Height</td></tr><tr><td>P+D Code</td><td>45.5</td><td>1.5</td><td>Medium</td><td>6-12m</td></tr></table> <p>To address this issue the following amendments are suggested to the table on page 2234:</p> <ul style="list-style-type: none">1 medium tree/30m² deep soil and 1 small tree/10m² deep soil1 large tree/60m² deep soil and 1 medium tree/30m² deep soil <p>The table on page 2234 (please see below) specifies <4m canopy spread for small trees. This should be consistent with the table on page 2241 and specify a small tree mature spread of 2-4m to ensure that shade trees are planted.</p>	Site area	350m²					Deep soil area m²	No. trees	Tree size	Height	P+D Code	24.5	0.8	Medium	6-12m	Site area	650m²					Deep soil area m²	No. trees	Tree size	Height	P+D Code	45.5	1.5	Medium	6-12m
Site area	350m²																																
	Deep soil area m²	No. trees	Tree size	Height																													
P+D Code	24.5	0.8	Medium	6-12m																													
Site area	650m²																																
	Deep soil area m²	No. trees	Tree size	Height																													
P+D Code	45.5	1.5	Medium	6-12m																													

119.	Car Parking	<p>General Development Policy: Design in Urban Areas. All Development - Car parking appearance [PO + DTS/DPF 6.4-6.7] p2230</p> <p>General Development Policy: Design in Rural Areas. All Development - Car parking appearance [PO + DTS/DPF 7.4-7.7] p2257-2258</p>	<ul style="list-style-type: none">These clauses are strongly supported.The effectiveness of shade from trees is shown in a recent assessment of road/asphalt surfaces and trees in regard to urban heat prepared for the City of Charles Sturt by Seed Consulting. It suggests that asphalt surfaces shaded by trees provide a cooling of 15°C compared to roads with no shading and thermal comfort (how it <i>feels</i> to humans) 10°C lower under trees compared to asphalt road surfaces exposed to direct sunshine. <p><u>Seed Consulting Services, September 2019, <i>CoolSeal Treatment Impact Assessment: technical report</i> – prepared for the City of Charles Sturt</u></p> <table><tr><th colspan="2">Tree size and site area definitions</th></tr><tr><td>Small tree</td><td>4-6m mature height and <4m canopy spread</td></tr><tr><td>Medium tree</td><td>6-12m mature height and 4-8m canopy spread</td></tr><tr><td>Large tree</td><td>12m mature height and >8m canopy spread</td></tr><tr><td>Site area</td><td>The total area for development site, not average area per dwelling</td></tr></table>	Tree size and site area definitions		Small tree	4-6m mature height and <4m canopy spread	Medium tree	6-12m mature height and 4-8m canopy spread	Large tree	12m mature height and >8m canopy spread	Site area	The total area for development site, not average area per dwelling
Tree size and site area definitions													
Small tree	4-6m mature height and <4m canopy spread												
Medium tree	6-12m mature height and 4-8m canopy spread												
Large tree	12m mature height and >8m canopy spread												
Site area	The total area for development site, not average area per dwelling												
120.	Transport, Access and Parking	<p>General Development Policy: Transport, Access and Parking. Vehicle Access [PO + DTS/DPF 3.5] p2324</p>	<ul style="list-style-type: none">The reference to mature street trees should be removed and the clauses should refer to street trees in general to minimise street tree loss.Suggest the following DTS be added to ensure that if the removal of street trees cannot be avoided that there is no net loss:If the removal of a street tree is unavoidable a replacement street tree of at least Xm is to be planted at a location agreed by Council.										

			<ul style="list-style-type: none"> • Reference to mature trees should be removed and agree to reference to street trees in general. • In the case of trees requiring removal to accommodate development including services and access points as there are no alternative design solutions, an amenity tree evaluation is undertaken, including any costs incurred in relation to the removal cost and replacement costs of an appropriate tree species to be planted preferably adjacent to the affected property or in close proximity as per Council's Tree and Streetscape Policy. • Recommendation is no change made in relation to Council's authority in approving works on public land, currently authorised under the Local Government Act (Section 221).
121.	Transport, Access and Parking		<p>DTS/DPF 3.1</p> <ul style="list-style-type: none"> • Where is the 6m measured from? What about other types of pedestrian crossings? <p>PO 3.5</p> <ul style="list-style-type: none"> • Include bus stops (boarding areas for front and middle doors), sign posts (1m clearance). <p>PO 3.6</p> <ul style="list-style-type: none"> • Delete 'separated' and say 'minimised and located so as.....' <p>PO 3.7</p> <ul style="list-style-type: none"> • Specify distance. <p>PO 6.2</p> <ul style="list-style-type: none"> • Definition for 'sensitive receivers' <p>DTS/DPF 6.1</p> <ul style="list-style-type: none"> • Clarify whether it's movement of vehicles or pedestrians, etc. as well. <p>PO 6.5</p> <ul style="list-style-type: none"> • 'floodlit' should be just 'lit' or 'lit to Australian Standards'. <p>PO 6.7</p>

			<ul style="list-style-type: none"> Unclear about residential (e.g. can they use their garage behind a roller door). 'at all times' is potentially too specific. Consider at all times that visitors are reasonably expected....' <p>PO 9.3</p> <ul style="list-style-type: none"> Specify if 'all' non-residential must/shall <p>DTS/DPF 9.3</p> <ul style="list-style-type: none"> Currently incomplete <p>Page 2335 include 'interchange' definition</p> <ul style="list-style-type: none"> Is the 400m measured in a radius, what about actual walking distance? Table 3 – p2336 – include rates for secondary and primary school students Include definition for 'major transport routes' <p>Page 2142/2</p> <ul style="list-style-type: none"> Sentence is incomplete – unclear <p>Other matters not considered addressed in the draft Code:</p> <ul style="list-style-type: none"> No mention of corner cut-off provision in local roads (only mentioned in the Major and Urban Transport Route Overlays). No mention of sight line requirements of local roads (only mentioned in the Major and Urban Transport Route Overlays). No mention of encroachments on public roads (only mentioned in the Major and Urban Transport Route Overlays).
122.	Car parking, Access and	DTS / DPF 23.4 – Pg 2244	<ul style="list-style-type: none"> This allows approval to be authorised by third-party certifier without Council's arboricultural officers having opportunity to provide input or reference to Council's Tree and Streetscape Policy. The two-metre separation is currently being used as a minimum separation distance between the tree and the

	Manoeuvrability	Vehicle access to designated car parking spaces: (b) 2m or more from a street tree unless consent is provided from the tree owner;	<p>crossover however the setback required is determined by the tree species, trunk diameter and for large mature trees, its structural root zone radius which is calculated in accordance with AS 4790-2009 – Protection of trees on development sites.</p> <ul style="list-style-type: none"> • A minimum separation between the subject tree and proposed crossover is to protect the tree and provide space for tree growth and minimise future damage to the crossover. • Recommendation is no change made in relation to Council's authority in approving works on public land, currently authorised under the Local Government Act (Section 221)
123.	Open Space	General Development Policy: Design in Urban Areas. Private Open Space [DTS/DPF 20.1] p2239 + 2253	<ul style="list-style-type: none"> • The addition of site areas of more than 1,000m² in the Outdoor Open Space table (p2253) is strongly supported to provide adequate open space relative to site area. • The minimum dimensions and maximum open space area that can be comprised of balconies and roof patios and the like should be transferred from the current Development Plan (General Section, Residential Development – Private Open Space) to the Code to ensure that usable open space is provided and to retain the principles of the current Development Plan that private open space 'be generally at ground level (other than for residential flat buildings)'. • The Administrative Definition for private open space (page 2984) should include that it does not include communal open space. • The minimum dimension for outdoor open space table 1 on page 2253 should be separated out and be presented as it is in the current Development Plan – so that it is clear that the minimum dimension applies to all open space areas and not just the area adjacent to a habitable room.
124.	Housing Renewal	General Development Policy: Housing Renewal [All] p2273-2282	<ul style="list-style-type: none"> • Significant clauses that would improve amenity and efficiency that are included for other types of dwellings are missing for those that trigger the General Development Policy: Housing Renewal. The clauses listed below should be included in the General Development Policy: Housing Renewal, due to the relative vulnerability of future residents there is an increased need to ensure dwellings provide higher levels of protection for residents. <p>Landscaping</p>

			<ul style="list-style-type: none"> Tree planting requirements should be included for this development type – the requirements in General Development Policy: Design in Urban Areas, Landscaping PO + DTS/DPF 21.2 p2240 should be transferred to the Housing Renewal Policy – as the many benefits from tree planting should be available to and are necessary for all housing types. <p>Water Sensitive Design</p> <ul style="list-style-type: none"> Clauses DTS/DPF 22,1-22.3 from Development Policy: Design in Urban Areas (p2241-2243) should be transferred to the Housing Renewal Policy. This measure must be provided to ensure that the proposed water sensitive design solution is contributing to the stormwater and cooling objectives. <p>Environmental Performance</p> <ul style="list-style-type: none"> The requirements of General Development Policy: Design in Urban Areas, Environmental Performance 4.1-4.3 (p2229-2230) should be transferred to the Housing Renewal General Development Policy. Creating dwellings with improved amenity and lower operating costs should be a priority. The Australian Council of Social Service (ACOSS) and Brotherhood of St Laurence report highlights that low income and disadvantaged households are spending more of their income on energy costs compared to the national average – which can lead to going without energy related essentials, financial stress and vulnerability to high energy prices. The addition of solar PV can also reduce energy stress. Encouraging a good standard of energy efficiency standard at planning and construction can help ensure that low income households are not locked into high operational costs. <p>References:</p> <ul style="list-style-type: none"> <u>ACOSS and Brotherhood of St Laurence, October 2018, <i>Energy Stressed in Australia</i></u> <u>https://www.acoss.org.au/climate-and-energy-publications/</u>
125.	COASTAL	<p>Small-scale settlement subzone Pg 127</p> <p>Land division PO 3.1</p>	<ul style="list-style-type: none"> Unclear why “faunal habitat” is identified separately in DO1. Suggest remove word “faunal” or add “and floral” <i>Land division that avoids areas where coastal or river processes occur and is for the creation of allotments required to accommodate dwellings relocated as a result of unacceptable coastal hazard risk.</i> – this seems to be the first introduction of a planned retreat mechanism – what is the broader policy position around this? Where will this apply?

126.	RAMSAR Wetlands Overlay	PO 1.1 Pg 2170 PO 1.6 PO1.7	<ul style="list-style-type: none"> Suggest remove word “significant”. Any development which leads to negative impacts on RAMSAR wetland habitats is to be precluded and is consistent with PO1.3. “frequent jetties” – poor wording – what is the intent/meaning multiple number of jetties? Define/clarify What is defined as an “ecologically significant proportion”? Too vague and qualitative to be applied with rigour and confidence. Provide definition term in this context.
127.	Prescribed well area overlay	General	<ul style="list-style-type: none"> Provision discusses the taking of water, but not the injection of water for environmental benefit or later recovery (MAR or ASR). Needs to be considered for inclusion.
128.	Prescribed watercourses overlay	General	<ul style="list-style-type: none"> Suggested amendment “<i>DO 1 Protection of prescribed watercourses by ensuring the taking of water from such watercourses is avoided or is undertaken in a sustainable manner</i>” and may include the taking of water for environmental benefit such as: <ul style="list-style-type: none"> the mixing of stratified waters, the recharge of downstream wetlands for habitat or other purposes, the taking of water from a prescribed watercourse to prevent discharge of waters from that watercourse where it may unduly impact the receiving waters. This would allow for the current method of supporting Torrens Lake health by River Torres flows which we then harvest for recharge Grange Lakes System and St Clair Wetlands and prevent discharge to sea where the receiving waters are subject to possible environmental nuisance from the flows (polluting the water and fouling the beach).
129.	General statement		<ul style="list-style-type: none"> As a partner organisation of the Healthy Parks Healthy People SA, Quality Green Public Space (QGPS) Reference Group, the City of Charles Sturt <i>broadly support the inclusion of WSUD principles, private green space and tree planting provisions in phase three of the Draft Planning and Design Code.</i> In order to achieve the 30-Year Plan for Greater Adelaide target of increasing urban green cover by 20% in metropolitan Adelaide by 2045, green open space needs to be recognised and valued like other community assets and considered at all stages in planning and development processes. Along with the government’s commitment to establishing Green Adelaide, the private tree planting and water sensitive

			<p>urban design proposals in phase three of the draft Planning and Design Code, provide a key strategic, coordinated approach to the greening of Metropolitan Adelaide for the benefit of the whole community.</p> <ul style="list-style-type: none"> • Refer to Government of South Australia & The Australian Institute of Landscape Architects – SA Chapter (2019) <i>Creating greener places for healthy and sustainable communities: Ideas for quality green public space in South Australia</i>. Government of South Australia. Available at https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/resources/draft+creating+greener+places+for+healthy+and+sustainable+communities?contentIDR=24d0a548-8b05-4985-af5c-5d6aba34ea10&useDefaultText=1&useDefaultDesc=1
--	--	--	---

PART 6 – INDEX OF TECHNICAL AND NUMERIC VARIATIONS		
No.	Overlays	Comment
130.	Local Heritage Places	<ul style="list-style-type: none"> Items should be in alphabetical order (by suburb name, followed by street name) There are a number of typographical errors in the current Development Plan list which have not been rectified Description for 227 Esplanade, Henley Beach is missing the words “, cast iron and masonry fence.”
131.	State Heritage Places	<ul style="list-style-type: none"> State Heritage Places are not in the Code.

PART 7 – LAND USE DEFINITIONS		
No.		Comment
132.	Ancillary accommodation	<ul style="list-style-type: none"> Consider excluding ancillary accommodation from the definition of a dwelling and visa versa to ensure they are exclusively defined.
133.	Community Centre	<ul style="list-style-type: none"> The term features prominently in the Draft Code but there is not land use definition.
134.	Bulk goods outlet	<ul style="list-style-type: none"> Include the examples with the Inclusions column.
135.	Motor repair station	<ul style="list-style-type: none"> Consider including in the definition ‘vehicle servicing’
136.	Dwelling	<ul style="list-style-type: none"> Definition amended to delete term ‘site that is held exclusively with that dwelling’ and instead read ‘comprising 1 dwelling on its own site and has frontage to a public road.’
137.	Light Industry	<ul style="list-style-type: none"> Include exclusions in Column D.
138.	Personal or domestic services establishment	<ul style="list-style-type: none"> Include some inclusions in Column C.
139.	Tourist accommodation	<ul style="list-style-type: none"> The definition should clarify that it excludes dwelling from the definition particularly where a dwelling is not envisaged in a zone but tourist accommodation is.
140.	Waste Transfer Facility	<ul style="list-style-type: none"> A Waste Transfer facility is not defined in the draft Code. Is it to be defined as Special Industry? If so it should be specified under this definition in inclusion column C.

PART 8 – ADMINISTRATIVE DEFINITIONS		
No.		Comment
141.	Mature Street Tree	<ul style="list-style-type: none"> This term needs a definition. Referred to under General Section, Transport, Access & Parking, DTS/DPF 3.5, page 2324
142.	Higher Order Roads	<ul style="list-style-type: none"> This term is referred to in the Code in numerous areas and requires a definition
143.	Urban Transport Routes	<ul style="list-style-type: none"> No definition behind this term. Does it mean arterial roads only or all roads? If all roads should apply across CCS? DTS/DPF 4.1 refers to certain km roads. CCS also has a number of 40kph roads.
144.	Building levels	<ul style="list-style-type: none"> Need guidance as to the height of a building level eg. 3 metres equals 1 building levels/1 storey Need to define what a floor is. Is there an exclusion to floor level if underground?

Part 2 - OTHER ZONES NOT PROPOSED IN CCS			
No.	Zones		Comment
145.	Conservation Zone	Conservation Zone (p 119) DO1	<ul style="list-style-type: none"> Strongly supported in general terms need to clarify how “low impact” is defined.
146.	Conservation Zone	Land use PO1.1	<ul style="list-style-type: none"> Terms “small-scale” and “low-impact” are too vague and qualitative to be applied with rigour and confidence. Provide definition for both terms.
147.	Conservation Zone	Land Use PO 1.3	<ul style="list-style-type: none"> Farming activities on already cleared land may not be appropriate in all circumstances – sites may be identified as important buffers, seed bank, or habitat for hitherto undetected species.
148.	Conservation Zone	Environment Protection PO 3.1	<ul style="list-style-type: none"> The word “avoids” does not preclude development. Change to “is not permitted”. The word “important” is too vague and qualitative to be applied with rigour and confidence. Provide definition term in this context.
149.	Conservation Zone	Built form and character PO4.2 a) & b) (p120)	<ul style="list-style-type: none"> It is unclear what the intent is of this clause w.r.t “tightly defined” – who is responsible for defining this? How is extent defined? Add the word “existing” immediately preceding “recreation trails”.
150.	Conservation Zone	PO 4.3 (pg 121)	<ul style="list-style-type: none"> And is not permanently occupied by a regular occupant on a continuous basis as a dwelling to avoid the “caravan park” as permanent home effect.

151.	Conservation Zone	Visitor Experience Subzone DO1 (pg 123)	<ul style="list-style-type: none"> Unclear why “faunal habitat” is identified separately in DO1. Suggest removing word “faunal” or add “and floral”.
152.	Conservation Zone	PO2.4 c (Pg 124)	<ul style="list-style-type: none"> D/ add the phrase after “risk”, particularly that of bushfire.
153.	Conservation Zone	Dwelling subzone DO1 (pg 125)	<ul style="list-style-type: none"> Strongly supported and suggest adding words “facilitate and enhance connectivity for movement of fauna by “linkING habitats...””
154.	Conservation Zone	Environmental Protection and Hazard Risk Minimisation PO3.1 Open space and recreation (pg 2317) PO 2.3	<ul style="list-style-type: none"> “Facilitates habitat” in this context is better replaced with “provides and enhances habitat” and “facilitates biodiversity” with “enhances biodiversity”
155.	Employment Zone		<ul style="list-style-type: none"> Desired Outcome 1 – Remove the word ‘comprehensive’ considered unnecessary. Performance Outcome 1.1 – The policy is too long and confusing to read. The intent is understood that the Zone envisages higher impacting land uses in the core areas of the zone but encourage other business activities to the fringes of the zone where it interfaces another zone. Recommend the following amendment: <i>Development primarily for a range of higher impacting land uses including general industry, warehouse, transport distribution primarily in locations not affected by an interface with another zone that encourages sensitive land uses. Other development of a lesser impact including motor repair station, office, consulting rooms, shop, light industry and the like to provide a transition between higher impacting land uses at the zone interface.</i> Shop – This is a significant shift from 250m2 to 500m2. PO 3.2 – Remove the word ‘façade’ as it really means frontage and replace with ‘building elevations’ Refer to Oxford Dictionary definition. PO 1.3 – excludes bulky goods outlet but DTS/DPF 1.3, part b) includes ‘in the form of a bulky goods outlet.’ Side and rear setback policy guidance needed if a site does not about the boundary of another zone intended for residential development.

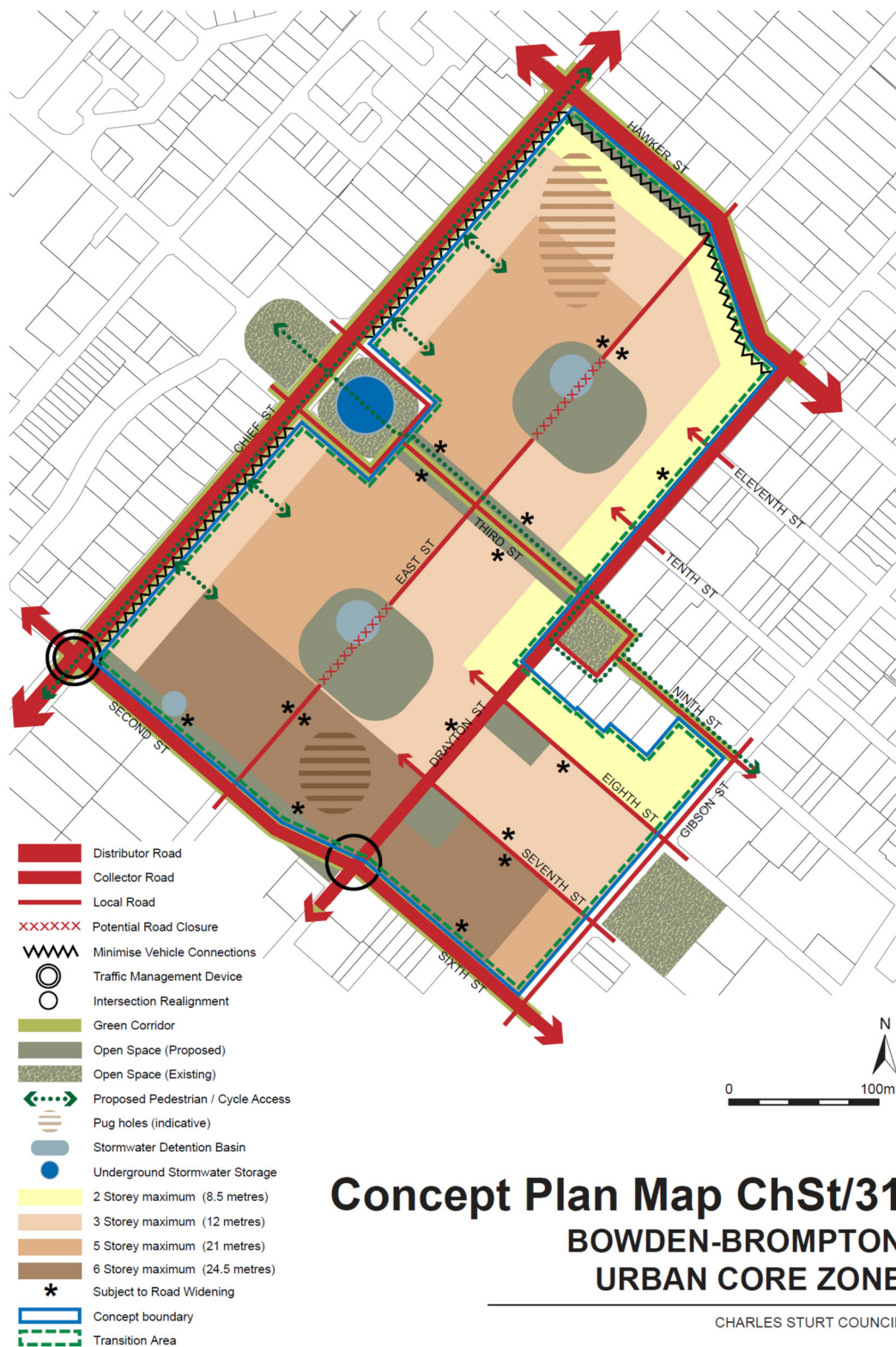
		<ul style="list-style-type: none"> There is no policy guidance for maximum building height. Currently the Urban Employment Zone has a maximum height of 12 metres. For consistency this policy should be included.
--	--	---

ASSESSMENT PATHWAY TABLES – GENERAL COMMENTARY		
No.	Reference	Comment
156.	Table 3 Performance Assessed Development	<ul style="list-style-type: none"> The pathways for assessing a development on its merits either lacks policy for the zone or picks certain policies for assessment. ALL policy in the related zone should be included in the assessment under this pathway regardless if they have been already met or not. Identified many instances where relevant policy is missing in the assessment eg PO 8.1 in some instances is not pulled in like general neighbourhood zone under deemed to satisfy or performance assessed but it is a policy that triggers a notice. We have noted that the procedural tables are not referenced under the zone section and thus would not apply and would not result in a reduction in notification as all performance assessed development is notified unless varied by the code and for the zone code variation to apply it would need to be listed in the table By listing everything in the zone as applicable assessing officers will see all that is relevant to the zone and this will grow their understanding of what is desired for that area. By limiting what they see they will not grasp the full picture.

Comments on Legislative processes in general			
No.	Reference	Comment	
157.	Relevant authority for building assessment	<ul style="list-style-type: none"> It is very confusing within the legislation about when the Council would be the relevant authority for building rules. Advice from DPTI is that the CAP is the authority under Section 93 but only where the applicant has applied to the CAP for building rules. Section 98 says Council is the relevant authority as provided in Section 99. Part 1 of Section 99 outlines that if the development involves the performance of building work and a 'relevant authority' determines to act under this section then the relevant authority (Council based on Section 98) may determine to assess the building rules or require that the assessment be undertaken by a building certifier. Suggest that Section 93 be amended to say that CAP is the relevant authority for planning decisions and leave Section 98 and 99 to be the reference for building rules. 	
158.	Regulations - Regulated trees	<p><i>a) to a tree located within 10 metres of an existing dwelling or an existing in-ground swimming pool, other than a tree within 1 of the following species (or genus) of trees:</i></p> <p><i>Agonis flexuosa (Willow Myrtle)</i> <i>Eucalyptus (any tree of the genus);</i></p>	<p>Willow Myrtle – <i>Agonis flexuosa</i> should be removed as the species does not make an important visual contribution to the local character and amenity of the area.</p> <p>Include <i>Corymbia</i> species – as an alternative as its related to the <i>Eucalyptus</i> genera</p>
159.		<p>Schedule 14—State agency development exempt from approval</p> <p>1 (1) The following forms of development, other than in relation to a State heritage place or within the Adelaide Park Lands, are excluded from the provisions of section 49 of the Act:</p>	<p>It is recommended that significant and regulated trees on community land including road reserve should be exempted development. Councils have extensive consultation processes in place. Also replanting programs in line with Council Community Plans.</p> <p>Other Government departments have exemption. There is also conflict between exemption on public school property and not on private school property.</p>
160.	Schedule 4 – Development Regulations – exclusions from definition of development - general	This section of the Regulations exempts fences from the definition of development other than:	<ul style="list-style-type: none"> The Regulations are not clear that a fence in the proposed Historic Area Overlay requires development approval as is currently the case

		<p><i>(d) a fence not exceeding 2.1 m in height (measured from the lower of the 2 adjoining finished ground levels), other than—</i></p> <p><i>(i) a fence in—</i></p> <p><i>(A) a designated flood zone, subzone or overlay; or</i></p> <p><i>(B) in any other zone, subzone or overlay identified under the Planning and Design Code for the purposes of this subparagraph; or</i></p> <p><i>(ii) a fence in the Local Heritage Area Overlay under the Planning and Design Code, or any other area identified under the Planning and Design Code for the purposes of this paragraph, that is situated on the boundary of the relevant allotment with a road (other than a laneway); or</i></p>	<p>for fences in a Historic Conservation Area under the Development Act Regulations, 2008.</p> <ul style="list-style-type: none"> • The PDI Regulations under Schedule 4 has also removed the exclusion from development for fences located in the existing West Lakes General Policy Area 18 or West Lakes Medium Density Policy Area 19 in the Residential Zone in the City of Charles Sturt. • The PDI Regulations has not included the amendments previously sought in Schedule 3 of the Development Regulations, 2008 as approved by the Minister in the Residential City-wide DPA for Charles Sturt to: ‘only list lake and coastal frontage fences within Policy Areas 18 and 19 as constituting ‘development’. • The drat Code also lacks policy to support the assessment of fences for the existing contained in Policy Area 18 and Policy 19 within the Residential Zone in the Charles Sturt Council Development Plan. The existing policy includes the following: <p><i>PDC 7 Fencing of boundaries forward of the main façade of a dwelling, and that abut lake or coastal frontage should:</i></p> <p><i>(a) be open in style</i></p> <p><i>(b) have a maximum height of 1.2 metres</i></p> <p><i>(c) incorporate materials that match the associated dwelling.</i></p>
--	--	--	---

Attachment A – ERD Committee recommended amendment – Bowden Brompton Concept Plan



Concept Plan Map ChSt/31 BOWDEN-BROMPTON URBAN CORE ZONE

CHARLES STURT COUNCIL

