

APPENDIX A

From: [David Kennedy](#)
To: [Chris Bentick](#)
Cc: [Jim Gronthos](#)
Subject: Re: Final Draft DPA
Date: Friday, 30 April 2021 12:27:02 PM

27 April 2021

Re: Final Draft DPA

Hi Chris

Thank you for your email.

Regards paragraph One:

I'm aware of the State Governments requiremeant to increase population by way of the Urban Infill Agenda by 2026 I think it is as it looks to increase the City's density and population.

Regards Paragraph Two:

I suggested zero traffic based on the fact that your options were zero, 20%, 40% or half. I am happy to change that to a maximum of a 20% increase in traffic along Wilpena and Muldulla resulting from the Bianco Development site. This is base deducted on our initial concerns relating in particular to noise and the close proximity of the dwelling to the roads and as a consequence, the effect it would have on bedrooms and sleep disruption.

Regards Paragraph Three:

That would be great and am open to discussion.

Regards Paragraph Four:

That would be a discussion point we would very much like to weigh in on when the time comes and I'm sure other residents might too.

Kind Regards

David & Sheryl Kennedy

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From: David Kennedy [REDACTED]
Sent: Tuesday, 20 April 2021 7:01 PM
To: Chris Bentick <cbentick@charlessturt.sa.gov.au>
Cc: Jim Gronthos <jgronthos@charlessturt.sa.gov.au>
Subject: Re: Final Draft DPA

20 April 2021

Re: Final Draft DPA

Hi Chris

Thank you for your email.
Apologies for the poorly laid out email, I'm having some email issues at the moment.

Traffic:

Our property is at [REDACTED] [Wilpena Terrace](#) on the corner of Mundulla Street. It is a terrace property and is State Heritage listed. Two of the four bedrooms are located on the Mundulla Street side of the property.

We have owned the property for some seven years and have come to accept the noise that current traffic using Mundulla Street makes. At present, the street is used quite frequently at all hours. There are certain cars that speed down Mundulla at early hours of the morning (between 1:00am and 4:00am) and accelerate hard as they leave the give-way sign to travel further up Mundulla or left on to Wilpena. Many of these vehicles are hotrod cars, trail bikes and Harley's and so they make an enormous amount of noise as they are stationary and as they drive off.

It is important to understand that our bedrooms are quite literally 10 feet (heel to toe) away from the actual road of Mundulla Street, separated only by the wall and glass windows. I suffer from Fibromyalgia and my wife suffers from Crohn's Disease, so our sleep is already affected quite severely. My son who also suffers from anxiety and panic attacks, is a shift worker who often starts at 5:00am. So sleep patterns are already an issue for us that requires management.

Under the current conditions, I/we are woken regularly by loud traffic and find ourselves being woken up every hour or so. On the Friday morning, the rubbish trucks are particularly noisy and I challenge anybody to sleep through as they stop and drive on. So although, the suggestion that as a result of the DPA amendment, traffic has been reduced by 40%, in fact it will be an increase of 40%+ in our particular case.

Our primary concern, is the continual noise generated from traffic at such a close distance to where we are expected to sleep. It is the sheer volume of traffic that will attempt to squeeze out onto Davids Terrace at both peak hour times and during the day.

I have spoke about this with various people and everyone we have spoken to have immediately identified the issue of building such a large development with so many houses and using a tiny side street as the access point. To all, it seems illogical, so we are confused as to why the council and developers would think it's a good idea?

Also worth noting. Peak hours have changed. Peak hour used to be very clearly between 4:30pm and

6:00pm weekdays in the 80's and 90's. But peak hour has shifted to between 3:00pm to 6:30 pm as more people try to beat the rush. This is also compounded by the fact that Kilkenny has an eclectic mix of both white and blue colour workers, so shift workers should also be identified who start and finish earlier than white collar workers. I know this mostly because before I retired, my office was located in Pirie Street Adelaide and I experienced the shift in peak times as I commuted to and from work each morning.

It's very easy to gather some data and produce a report that supports the councils idea of using the side streets as access points, but 'context' needs to be considered and that doesn't always come from data but rather by getting out and talking to concerned residents and watching the traffic flows in built up areas.

As residents of Prospect for over thirty years, you only need to take a look at both Prospect and Churchill Road which have been reduced to a crawl since the introduction of the additional houses and apartments to undersand the impact additional homes will have. This became the reason we sold and left Prospect. It should also be noted that hardly anyone only has one car anymore. Most families are two and three car families.

All of the above doesn't factor in the trucks and commercial vehicles that will also use the access points whilst development occurs. As stated. This isn't a case of traffic passing by, like a main road. This is a case of traffic stopping at our bedroom window, idling whilst they negotiate the give-way sign, then accelerating under load as they move off. This creates substantial noise.

This continual amount of traffic and noise will certainly impact our lifestyle dramatically.

There are other concerns too, but perhaps not overly as important to us. For instance, this will affect our property but it may also affect the other three properties that face the same intersection.

Lastly, although there hasn't been an accident at the intersection of Wilpena and Mundulla since the change of the give-way sign recently, there are always continual near misses. If two cars collide at that intersection with a sufficient amount of force, it may send one car careering into somebody's property as it has done in the past. So an increase in traffic also increases the chance of collision.

Solution:

In terms of volume, we would request a zero increase in traffic along Wilpena Terrace and Mundulla Street to what is already accepted. How that would be managed, I'm not sure.

I would request that no trucks at all that would be associated with the development to be allowed to enter or exit via Wilpena Terrace or Mundulla Street aside from the regular rubbish trucks, furniture removals and delivery trucks.

An infrastructure of this size, it should have its own entry and exit points. The most obvious solution would be to build a bridge or tunnel below or above the railway line and have traffic exit out onto Port Road somehow where it has the ability to meld into the existing traffic flow quite easily and the ability to cater for such volumes. The narrow side streets of Old Kilkenny were not built to accomodate the sheer volume of expected traffic.

A secondary solution might be perhaps for the council or developer to provide, supply and install 'acoustic sound proofing to the walls and windows of our property to ensure that we are not disturbed by the traffic noise, but that would need to be a seperate discussion.

In addition, bollards could also be considered on the corners of Wilpena Terrace and Mundulla along with speed bumps along Mundulla Street.

Parking:

Parking is currently already an issue. At present train commuters park their vehicles along both Mundulla Street and Wilpena Terrace whilst they catch the train and return again later in the day.

This doesn't affect our ability to park our own cars personally that much as we have two driveways, but it does impact us when we have either visitors or tradespeople arrive who cannot park along side of our southern boundry. We have no parking already at the front of the property.

In addition, one Sunday each month when the Chinese Church has its congregation day, Mundulla Street from David's Terrace to Wilpena Terrace is packed bumper to bumper with no spaces available. Cars are regularly parked across our driveway at the back gates preventing me from getting my vehicle out.

Most of the parking issues will affect the many cottages along Wilpena Terrace that have 'off street' parking.

I hope this helps provide some solution. We are not trying to be difficult and certainly not against the development. We would love to see the area developed and given a Queen Street type feel. In fact the gentlemen that recently bought No 10 Wilpena has plans to open a cafe on the ground floor and I have always thought it would be a great idea to rename this particular part of Kilkenny, 'Old Kilkenny' to reflect the types of homes and buildings it accommodates and to seperate its identity from the 'Arndale Shopping Centre' part of Kilkenny.

Please feel free to email or call me at anytime if you need more information and I look forward to your reply.

Kind Regards**David Kennedy**

From: David Kennedy [REDACTED]
Sent: Monday, 19 April 2021 8:10 PM
To: Jim Gronthos <jgronthos@charlessturt.sa.gov.au>
Subject: Re: Final Draft DPA

19 April 2021

Re: Final Draft DPA

Hi Jim

Thank you for your email and posting the link.

There are still two issues we are very concerned about.

Using Wilpena Terrace and Mundulla Street as the main thoroughfare to the development site and the issue of parking.

Although the amended report suggests that the reduced traffic number wouldn't impact the roads or the terrace houses located within close proximity, it doesn't address the issue of noise or disturbance and how it will impact us as owners of the buildings.

It's already hard being woken by the sound and vibration of the occasional truck or two in the early hours of the morning. It would be unreasonable and almost intolerable to have to put up with multiple trucks driving past the bedroom window as work commences, not to mention the amount of cars anticipated at peak hour.

The bedrooms in our property are only 'Ten Literal Steps' away from the road of Mundulla Street. We have a son that works shift work and on occasion starts as early as 5:00am, so any increase in traffic impact him.

Can you please advise what options we have in terms of having a secondary say on the development please? Thank you.

Kind Regards

David Kennedy

From: [REDACTED]
To: [Jim Gronthos](#)
Subject: further feedback on revised Kilkenny Mixed Use DPA
Date: Saturday, 1 May 2021 8:27:49 PM
Attachments: [elamnek_kilkenny_development.docx](#)
[complaint_regarding_cycling_signage_in_reserve.pdf](#)

Hi Jim,

I was informed by a letter from Peter Malinauskas that residents are able to provide further feedback on the Revised DPA until 10 May 2021.

In light of that, I just wanted to add a concern relating to the issue of open space which has now been increase to the full 12.5% legislative requirement. While this is great news, my issue relates to the fact that the 12.5% includes the bikeway that will run along the train line.

I have done some simple area calculations using the Concept Plan Map ChSt/32 and it looks the bikeway will make up approximately 7% of the 12.5% while the extension to MJ McInerney Reserve will make up only 5.5% of the 12.5% This would be fine if the bikeway was a safe and useable space where local people can walk and play, but in my experience the bikeway currently running through MJ McInerney Reserve is anything but safe and useable by locals. The location of the shared bike/pedestrian path through the reserve, is a tiny piece of track in the middle of a long bike track from Adelaide to the Port (the Greenway), and as a result it is 'owned' by cyclists. A dangerous but significant minority don't want to slow down or ring bells and treat the shared path like a racetrack.

Please see the emails below and the attachment which outline concerns that I have already put to the council regarding having better signage for cyclists, and issues that I have experienced firsthand. Also find attached my submission to the original draft DPA.

My proposal would be to either:

- Create a physically separate 'pedestrian only' path that runs parallel to the bikeway or
- Not include the bikeway in the 12.5% open space, and increase the extension to MJ McInerney Reserve to the full 12.5% so that local residents (both current residents as well as residents of the proposed new development) can safely enjoy the additional open space.

Can you please let me know how I can formally submit this issue to the Council as a response to the revised DPA.

Regards
Eugene Lamnek
[REDACTED]

Sent: Monday, 17 February 2020 11:07 AM
To: 'Chris Bentick' <cbentick@charlessturt.sa.gov.au>

Subject: RE: MJ McInerney Reserve

Hi Chris,

Thanks for the detailed email. I don't think there is any need to meet on-site because you seem to know the area very well. I didn't realise that you were restricted to installing approved signs only (I just assumed you could get signs made up for any given purpose). It's definitely a pity that there are no approved signs to remind bike riders to use their bells, because they tend to appear from behind without warning.

Just a reminder in terms of the shared use path being designed to avoid play areas for young children, it currently goes past the skate ramp area which generally see quite a few young children on scooters (the smaller ramps being designed for young kids) and it's a bit of a blind corner for cyclists coming from Day Tce. Kids often ride back and forth from the shared use path to the smaller ramps. I understand that the shared use path will continue straight along the train line when the Kilkenny Development is built which will make this area a bit safer, but that might take a few years.

Thanks again for your response my complaint.

Regards
Eugene

From: Chris Bentick <cbentick@charlessturt.sa.gov.au>

Sent: Thursday, 13 February 2020 5:17 PM

To: [REDACTED]

Subject: FW: MJ McInerney Reserve

Dear Eugene

Thank you for your email and for providing the attached map and description of locations of concern in MJ McInerney Reserve. Officers from Council's Open Space team have forwarded me your concerns for investigation (by the Transport team).

Firstly, I'd like to express my sympathy about your recent experiences encountering cyclists engaging in reckless, and in some instances illegal, behaviour. Cyclists are required by law to give way to pedestrians on shared use path, ring their bell to warn of danger and of course to stop and give assistance to anyone involved in an accident. It is a shame that these people who you have encountered either were not aware or chose to ignore this.

With regard to the Reserve environment and path layout, as you are no doubt aware, MJ McInerney Reserve was recently upgraded. As part of the process for planning the upgrade, the Open Space team consulted with Engineering regarding the path network within the Reserve. As you are probably also aware, the Reserve is located on the Outer Harbor Greenway walking and cycling corridor and therefore the Reserve consists of shared use paths connecting Day Terrace to Pinda Street. In January 2020, 250 users were counted using the Outer Harbor Greenway per day, so it has a significant bicycle ridership.

The shared use path linking Day Terrace and Pinda Street was located to avoid and play areas for

young children and also to maintain alignment with the railway corridor, because the long-term plan is to continue the Greenway through the former Bianco site and adjacent the railway corridor to the intersection of David Terrae and Wilpena Terrace.

With regard to cyclists using the footpaths through the Reserve, obviously these cyclists should be using the shared use path provided. We are currently planning the installation of 'wayfinding' signs along the Outer Harbor Greenway, including signs in MJ McInerney Reserve to direct cyclists along the shared use path. We expect to install these signs prior to end of June 2020. These additional directional signs may assist in reducing the number of cyclists using the footpaths.

I note your suggestion of additional signage within the Reserve to manage safety risks. Currently, there is no appropriate sign requiring or reminding cyclists to slow down or to 'ride with care' approved for use in SA. In addition to this, I'm not convinced that a 'warning - pedestrians' sign will be of any benefit as cyclists using the shared use path would have already passed existing 'shared use path' signs and would be fully aware that they are entering a public reserve and that pedestrians are likely to be present. My observation is that most cyclists ride with appropriate levels of caution through these pedestrianised areas, but that there is a small minority of reckless or irresponsible riders (which is the case within any rider or driver group).

In the first instance I would like to install the additional wayfinding signs and to monitor path user behaviour after their installation. We can also commence discussions with the State Government Department for Transport regarding obtaining approval for supplementary signs reminding cyclists to 'ride with care', but those negotiations may take some time.

I am also happy to meet with you on site to discuss your concerns should you seek an on-site meeting.

I await your response.

Thank you and kind regards

Chris Bentick

Transport Engineer

Engineering Strategy and Assets

72 Woodville Rd, Woodville 5011

T: (08) 8408 1297 F: (08) 8408 1122

www.charlessturt.sa.gov.au

From: council@charlessturt.sa.gov.au <council@charlessturt.sa.gov.au>

Sent: Wednesday, 5 February 2020 11:44 AM

To: City of Charles Sturt <Council@charlessturt.sa.gov.au>

Subject: Requests, Compliments, Complaints

Requests Compliments Complaints Form

What

enquiry

would you Lodge a Complaint

like to

submit:

Name:: Eugene Lamnek

Email::

SA 5008

Phone

Number:|

On 13/12/2019 I rang the council to inform them that I had been hit by a bike at McInerney Reserve and that improved signage and or other measures might be needed to avoid future cyclist/pedestrian accidents in the reserve. I was assured that someone from the 'Open Spaces' team would contact me within the next week. I have What would you NOT been contacted at all. Yesterday I had a very close call with another cyclist who like to tell was going out of his way to ride dangerously and narrowly missed hitting myself and us:: my dog. I was hoping that someone could come out to the park so that I could show them the issue first hand. But since there are obviously flaws in the Councils internal communication processes, I have outlined the details of both incidents in the attached document. Can someone from the Council please look into this.

Do you

have a file

or a photo

you would

like to

submit:

complaint_regarding_cycling_signage_in_reserve.pdf, type application/pdf, 840.6 KB

Do you

have a file

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Email

Submitted

Data:

I believe high density living is not appropriate for the 'Affected Area' because it is inconsistent with the surrounding residential areas of Kilkenny and West Croydon. These areas are characterised by older homes (Villas, Bungalows and Tudor style houses) and the public spaces in these areas have seen a high level of community involvement with such things as street art, community gardens etc. The proposal to allow high density, multistorey living in Kilkenny will completely change the areas artistic feel and liveability both visually (by creating a skyline with 'out-of-place' multi-level modern buildings) and functionally (by increasing traffic volumes on previously low traffic streets and by creating overcrowding in public places such as MJ McInerney Reserve). I, like most residents of the surrounding area, would like to see this site re-developed into a residential space that integrates with and enhances the local area. However, I believe the proposed changes to the zoning to allow high density living could permanently and irreversibly scar the area.

I believe the traffic impact study carried out as part of the DPA has not adequately addressed the potential impacts of increased traffic volumes and street parking created by the estimated number of new dwellings (potentially 500 apartments). For example, the traffic study did not include the impact on roads such as Alfred Rd. As a long-time resident of Alfred Rd, (myself and my family have lived in the same house on this road for 21 years) I am very concerned that our road will become a major exit/entry route for the new development. It will be very easy for cars coming from the proposed development to take Alfred Rd and then Rosetta Street in order to access Port Rd or Torrens Rd. The traffic study should have included the West Croydon area and specifically Alfred Rd and Rosetta St.

As a daily user on MJ McInerney Reserve I believe that this reserve is already fully utilised by locals as well as many people coming from further afield. I walk my dog in this reserve every day and have been doing this for 4 years. My children have grown up using this reserve as one of their main play and sport areas. Since its recent re-development I have noticed many signs that this reserve is already over utilised or at best, fully utilised. On weekend BBQ areas and playground area are always full and parking has become a major issue along Sackville street. Having another 500 or so dwellings with little or no backyards will totally overload this reserve and create significant issues with overcrowding, litter and amenity in general.

The proposal to waive the standard 12.5% public open space requirement in this DPA is not consistent with the current body of knowledge on the importance of open space to people's general wellbeing and mental health. There have been many of these studies and this is just one of them:

Braubach M., Egorov A., Mudu P., Wolf T., Ward Thompson C., Martuzzi M. (2017) **Effects of Urban Green Space on Environmental Health**, Equity and Resilience. In: Kabisch N., Korn H., Stadler J., Bonn A. (eds) *Nature-Based Solutions to Climate Change Adaptation in Urban Areas. Theory and Practice of Urban Sustainability Transitions*. Springer, Cham

See full text at: https://link.springer.com/chapter/10.1007/978-3-319-56091-5_11

I believe the proposed Greenway re-alignment along the railway line and the small plaza do not mitigate the need for new open space included as part of any future development, especially towards the David terrace end of the development. Open space at the north western end of the development would provide residents of the development with some form of buffering from the traffic on David Terrace and would provide an alternative open space area which may reduce the impact on MJ McInerney Reserve.

[REDACTED]

a cyclist here on 4/2/2020 (5:30pm). The cyclist was intentionally riding very fast. I didn't hear him coming (he didn't ring his bell) I jumped out of the way at the last minute and he narrowly missed my dog. He did not stop or even turn around when I yelled at him. He was riding on a pedestrian path down an incline way too fast.

[REDACTED]

This path is NOT a shared path and yet bike riders often take this route. There are often small kids, dogs etc. on this path because the playground

[REDACTED]

[REDACTED]

I was hit by a cyclist here on 12/12/2019 (around 5:30pm), right next to the drinking fountain/dog water tap. I didn't hear or see him coming and he didn't ring his bell. It appeared to be intentional and he didn't stop or even turn around.

Location C.

Some cyclists come around this corner

[REDACTED]

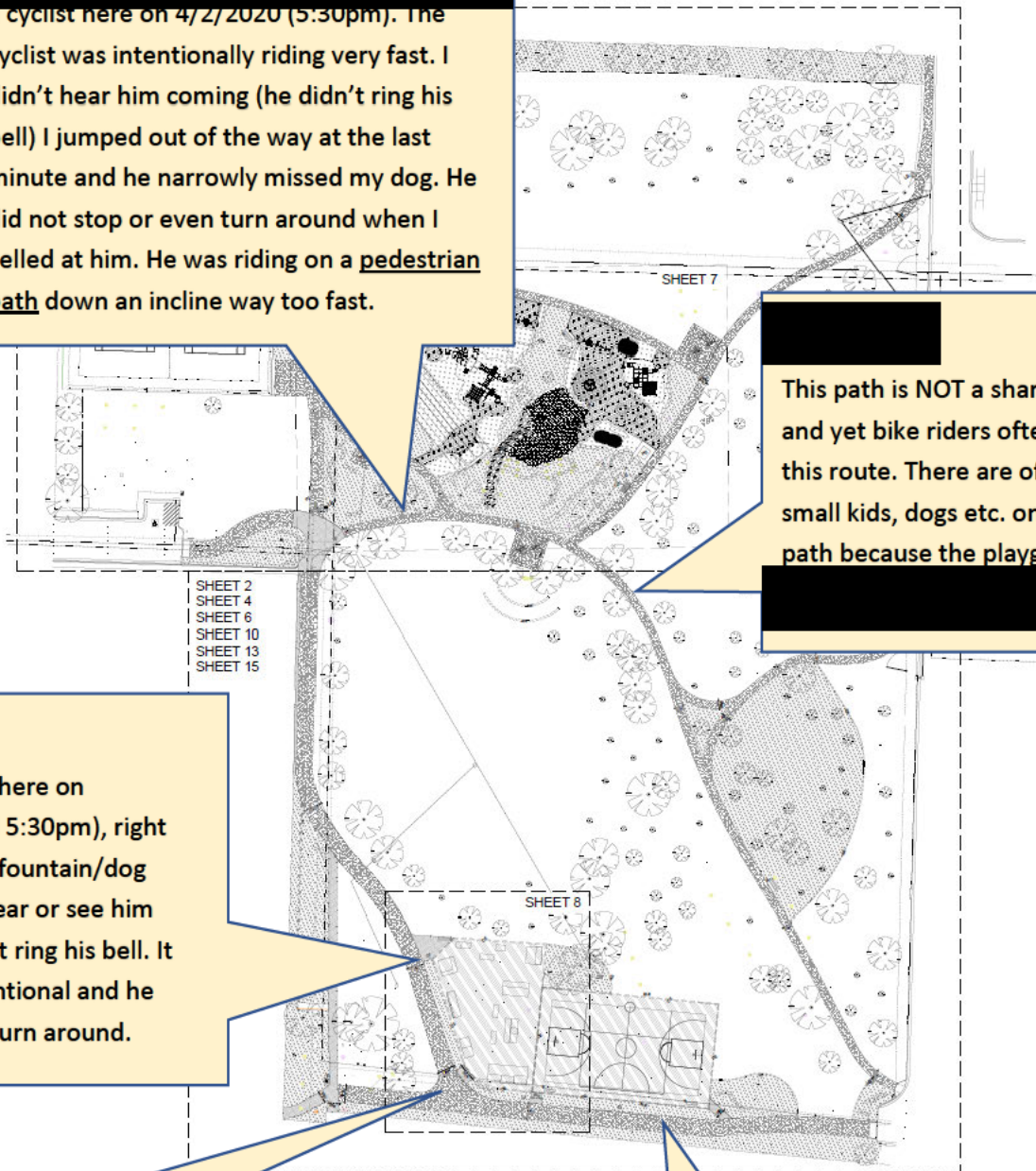
of the height of the skate ramps and there are often kids, dogs, dog walkers on and around the path

[REDACTED]

This path IS a shared. Bike riders

[REDACTED]

do not slow down enough.





Main Points

1. The issues outlined above occurred between 5-6pm when there are lots of people riding home from work, and lots of people walking dogs.
2. When a bike path such as the Greenway transitions from a road to a shared path, through a public park ie. Location F, there needs to be clear and obvious signage to cyclists to slow down and look out for pedestrians and to use their bells.
3. There needs to be signage to warn cyclists to slow down around the blind corners such as Location C.
4. There also needs to be signs to stop cyclists using the pedestrian path as a shortcut (Location E).

5. Many cyclists are doing the right thing and are riding safely, but there are also quite a few who are **intentionally riding too fast through the park**.
6. I am a 47 year old dog walker and being 6ft tall am very visible to cyclists and yet I have been hit once and very nearly hit a second time. If at the bare minimum, signage is not improved then it is very possible - even likely, that a small child, dog or elderly person will be hit and injured or killed.
7. This park has seen a **very large increase in numbers of visitors** since it was upgraded. This includes families with small children and dog walkers. At the same time it has also seen a **very large increase in cyclists passing through** it due to the upgrades and development of the Greenway bike track. These increases have created new accident risk scenarios within the park.

From: [Kelly Payne](#)
To: [Jim Gronthos](#)
Subject: Draft Kilkenny Mixed Use (Residential and Commercial) DPA - Submission
Date: Tuesday, 4 May 2021 12:05:17 PM

To whom it may concern,

I was advised that you would be accepting submissions for the Bianco site development up to 10 May, so I hope this is ok.

I have long had this idea and I really don't know how feasible it is but I think it could be a real game changer for the suburb and lines up with SA state goals.

I am not opposed to developing the Bianco site, however I believe this would be an incredible opportunity to do something that will grab attention and change the future of developments in Australia. That is to build a sustainable, eco village. This concept is widely used across Europe in towns such as Freiburg, Germany. Where they have community developed living that is completely powered by renewable energy, they allocate less parking to encourage more use of public transport (which is perfect for this location being next to a train station), they have inbuilt use of greywater, and buildings are designed to gain the most sun in winter and shaded in summer to be more economical. These community developments often have community gardens as well. You can find more about Freiburg here:

<https://wwf.panda.org/?204419/Freiburg-green-city>

<https://www.theguardian.com/environment/2008/mar/23/freiburg.germany.greenest.city>

The focus on sustainable development on this scale would be groundbreaking in Australia. You could even have small organic vegetable shops and cafes open on the ground floor which would be incredibly popular in the area (I am at the park twice a day, every day, so know the local people well).

This vision would assist Australia in meeting the 2030 Paris Climate Change Agreement and potentially inspire developments all over the country.

I believe as a leading state we should be making more environmentally friendly choices. I believe that this style of living would still be highly sought after, therefore ensuring profits remain high.

I really hope this submission is considered, it would make me incredibly proud to live in a council/ suburb that makes ground breaking changes towards a more sustainable and environmentally friendly future.

I welcome the opportunity to discuss this matter further.

Kind regards,

Kelly Payne

Ph: [REDACTED]

Email: [REDACTED]

Amended Kilkenny Mixed Use (Residential and Commercial) DPA – Submission by Melanie Ford and Lloyd Gedling

We are owner occupiers at ■ Wilpena Terrace Kilkenny, located immediately to the west and north of the proposed area to be rezoned. We understand that the rezoning of the existing Urban Employment Zone to Mixed Use (Residential and Commercial) will directly affect us and the amenity of our home in a number of ways. Please find below our concerns with the current amended Draft Development Plan Amendment.

Comments from previous submission - Vehicle movements and on street parking

The existing streets of Kilkenny particularly in the immediate vicinity of the area proposed to be rezoned are narrow. When one side of the street has parked cars, only one additional car can safely drive past. Traffic travelling in both directions at the same time safely is impossible. There are already congestion issues in Mundulla St between Wilpena Tce and David Tce when cars are parked on either side of the road.

Issues

- The streets already have car parking and vehicle movement issues because they are narrow.
- The draft plan will allow for more than 1400 additional car movements on the streets and a significant increase in on-street parking by 200-300 cars, effectively clogging the streets.
- Streets cannot be widened because existing residences are often built on allotment boundaries.
- Increased car movements particularly at morning peak will cause significant time delays and safety issues with traffic likely to be banked up on several streets and intersections waiting for a break in traffic to enter already busy David Tce.
- Increased car movements at afternoon peak will cause safety issues turning onto Mundulla St and others, from David Tce, particularly with access to Pinda St changed. The short right turn lane on David Tce is a refuge from busy traffic and often means a lengthy wait for a break in the traffic to turn. More than 2 cars are unlikely to safely be able to wait here.
- Providing an additional point of access/egress from Port Rd via Aroona Rd to the south of the current Bianco site should be fully investigated.
- Future commercial space should be limited to fronting onto David Tce to minimise further traffic congestion in the suburban streets.

Comments on issues above in further amended DPA 10/05/21

- We acknowledge that the dwelling numbers have been reduced, therefore numbers of vehicle movements should also have been reduced. This does not appear to be the case with expected numbers to “remain below 1500.”
- We still have concerns regarding significantly increased traffic use and additional on street parking numbers in narrow streets. The side streets are not wide enough to safely park either side and allow through traffic, which is then restricted to only one direction at a time. Current on-street parking particularly along the southern end of Wilpena Tce and eastern end of Pinda St is already at a premium during the day. This was not addressed in the amended DPA. This will affect the amenity of local on-street parking accessibility and use for the current dwelling occupants.
- We understand the the new traffic impact assessment has found the existing local road network has adequate capacity to cater for the additional number of vehicle movements. We believe that the increased number of vehicles using the local road network and parking along the narrow streets will have a significant impact on the quiet enjoyment of our area, particularly any congestion of vehicles moving onto or off of David Tce. Our streets are suburban in nature and are used by families and children. Significantly increased traffic

movements will impact this greatly through additional traffic noise and with safety concerns entering and exiting our driveways, and use by children.

- Increased car movements on David Tce was not addressed.

Comments from previous submission - Proposed increase in built density

The majority of residences surrounding the proposed area are single storey. The majority of residential sites are small in size with dwellings having a variety of character and form. The draft proposal will enable density to be increased exponentially, with the likelihood of massive built volumes (height as well as footprint) with minimal variety and articulation. This is not in keeping with the existing historic conservation area objectives to retain the aesthetic appeal and history of the area.

Issues

- The proposed density is not reflective of or sympathetic to the existing historic conservation area. It is dramatically at odds with the existing built form within the area, including basic century-old infrastructure such as roads.
- The proposal would allow for new developments to dominate existing residences at 3-5 storeys, both directly and indirectly through distant views. This will change the micro climate within the immediate area affecting access to sun and prevailing breezes for nearby existing residences.
- Limiting built form to 2 storeys maximum at the fringes to the proposed area particularly immediately abutting existing residences or directly across the road from, including Pinda Street, would be strongly preferred to minimise visual and physical impacts including overlooking into private spaces.

Comments on issues above in further amended DPA 10/05/21

- Further to our comments above, we understand the western end of the Bianco site will be allowed to be developed to 3 storeys high. This is immediately adjacent existing single storey dwellings at the corner of Pinda St and Wilpena Tce. This is not consistent with the amendment for only 2 storeys along Mundulla St with single storey form within the first 7m of the street frontage. We would like to see consistency to lower the scale of future dwellings in this section, which is immediately adjacent existing single storey dwellings which should be considered as part of the transition boundary aiming to not unreasonably dominate or overshadow nearby established residences and the streetscape generally.

Comments from previous submission - Environmental Impact

The significant increase in density will increase the area of hard surfaces radiating heat into the immediate surrounding area. The amendment is allowing future development to minimise green open space making use of existing green space in lieu of creating more. Green space requirements on the existing Bianco site will be mostly located on the southern side adjacent the railway line to be used as part of the Outer Harbour Greenway. It is likely that additional green space will not be incorporated into the development elsewhere if the percentage of green space requirement is used for the greenway. Open public green space in Kilkenny and the surrounding area is already minimal.

Minimal green space is likely to increase the proportion of hard ground surfaces. This will increase stormwater runoff and loss.

Opportunities should be seized to take advantage of evolving research and new professionally accepted and endorsed design practices to include requirements to provide alternative methods for minimising the effects of radiated heat and changes to micro climate, and making best use of stormwater within new dense urban developments.

The new developments at St Clair are a prime example of minimal open green space within developments. Driveways between townhouses and apartments are vacant, unpleasant, functional spaces that are for vehicles only, increasing radiated heat and air temperatures, and creating additional stormwater run off.

Comments on issues above in further amended DPA 10/05/21

- We understand that the 12.5% of public open space will be located on the eastern end of the development as an extension to McInerney Reserve. We appreciate that the full 12.5% of the site will now be used for public open space.
- We understand issues of private open space on a development site affecting the extent of hard surfaces and green space will be addressed via the development plan. We hope the issues of water sensitive urban design and urban heat load in new developments will acknowledge and reflect, if not exceed, current internationally accepted best practice to improve our built environment.

We are not opposed to new development. We are opposed to new development which significantly impacts the existing amenity of the area, particularly the addition of a significant number of cars and vehicle movements in the narrow streets around the site, and dominating built forms around existing single storey dwellings.

Please do not hesitate to contact us if you require any clarification to the points raised above.

Regards

Melanie Ford and Lloyd Gedling
Wilpena Tce, Kilkenny



Sue Moroney
■ Alfred Road
West Croydon
SA 5008
8/5/2021

I wish to comment further on the changes of the Kilkenny Mixed Use Development Plan for the Bianco site.

My concerns with the new proposed draft will address:

Traffic concerns

Environmental issues

Loss of amenity and enjoyment

Traffic concerns -

With the proposed daily trips of 1,863 trips (daily) and 196 (peak hour) this amount would cause major traffic problems. The surrounding roads particularly Aroona / Mundalla / Arkaba road are Heritage Roads. These roads were not built to deal with large numbers of extra traffic. Even if parking was restricted to one side of the road navigating around these roads would be a challenge.

On days when the local McInerney Reserve is busy (which is most weekends) parking would hinder movement in and around the proposed development. As I am only 2 streets away from the park and do not have a driveway I may be forced to park my car away from my residents on these busy days.

The David Terrace, Mundulla st entrance is often blocked with cars when the Monastery (50 David Terrace) are having an event. Cars need to wait at the beginning or end of the street to allow movement. Again, even with one side having no parking it would still be congested. With such an increase of urban traffic these quiet suburban back roads are at risk of becoming dangerous and for the residents a totally altered environment creating a loss of enjoyment and impact of their daily lives.

Mundulla Street (this photo was taken on a week day)





Arkaba Road



Pinda Street

Environmental issues

Our suburb will increase in heat and without increased greening and the use of dark roof tops or dark brick buildings the area will become hotter. Given the issues of climate change this seems unsustainable. See also:

https://www.greenerspacesbetterplaces.com.au/wwattb/city-of-charles-sturt/?fbclid=IwAR3w-NYE1eIPaarU4_rvDU_UqRPEUh-CQMjnrGjte-6lcG_3bSy-cBb3RzQ

The following is an exert from the "West Adelaide Urban Heat Mapping Project of 2017, prepared for the Cities of West Torrens, Charles Sturt and Pt Adelaide Enfield and Mount Lofty NRM. Prepared by Seed Consulting Service.

"The warmest suburbs by council area were: **City of Charles Sturt** - Ridleyton, Hindmarsh, Bowden, Brompton, Renown Park; City of Port Adelaide Enfield - Walkley Heights, Hillcrest, Enfield, Sefton Park, Northgate; and City of West Torrens - Ashford, Keswick, Kurralta Park, Mile End South, Thebarton."

Our council is doing quite poorly in regards to green space.

WATER SENSITIVE DESIGN NEEDS

We need to be mindful of storm water runoff which will cost council a great in the future as they have to upgrade our aging stormwater system. It also means that water is not getting in the soil below due to hard asphalt surfaces.

https://www.greenerspacesbetterplaces.com.au/wwattb/city-of-charles-sturt/?fbclid=IwAR3w-NYE1eIPaarU4_rvDU_UqRPEUh-CQMjnrGjtc-6lcG_3bSy-cBb3RzQ

Loss of amenity and enjoyment

POPULATION INCREASE: The new proposal will increase Kilkenny population by around 30 – 35% in that one space. Already the green space of McInerney Reserve is hugely popular and visitors from all over Adelaide. This increase for the park will lead to a loss of amenity and a loss of enjoyment for local residents and visitors.

The proposed 4 stories of dwellings will impact on the cultural characteristics of our community. The height will impact on the scenic, aesthetic and historic value of the area. Its design should reflect the values, rhythms, needs and cultural characteristics of our community and should be seen as having lasting value to the community. 4 stories do not reflect that.

As per the "Planning SA" website the new plans for SA that are created and approved are laying the literal foundations of the communities that our children and their children inherit and enjoy for **a liveable and sustainable future.**

With the large number of local residents opposing the large scale of this development it's important to know that the community did not approve these new proposed amendments and such a big scale will have an immense impact on our daily lives.

We must think **liveable and sustainable...**

Regards

Sue Moroney

From: [REDACTED]
To: [Jim Gronthos](#)
Subject: Draft Kilkenny Mixed Use (Residential and Commercial) DPA - Submission for Appendix to Minister for Planning and Local Government
Date: Monday, 10 May 2021 4:22:46 PM

Hi Jim,

In accordance with the invitation from the minutes of the city services meeting on 19th April 2021, below is my formal submission for the consideration of the Minister. As previously, please do not publish my name and address in online documents accessible to the public. Printed copies or privately circulated submissions is OK.

To the Minister for Planning and Local Government,

After reviewing the amendments to the Kilkenny Mixed Use DPA submission, including the council responses to the community feedback process I am genuinely shocked that this was unanimously approved for submission to you, the Minister, as it appears the overwhelming community opposition to dwellings higher than 2 storeys across the site has been responded to with minor modifications and a flurry of copy and paste answers absolving the council of responsibility to key concerns outlined by residents.

I imagine this main development of 4 storeys of the old Bianco building will be a similar height to the current building and that is the justification for this minor reduction, however, the majority of residents overwhelmingly have submitted feedback opposing this height citing all sorts of reasons, many of which I agree with, mainly concerning the 'fit' of the buildings in this historic area, and restriction of other houses in the area to be no more than 2-storey height. I again must mention that this is not Bowden, and it is not on the fringe of the Adelaide city parklands, this is a smaller to medium sized park that has already been overdeveloped (with zero consideration to the increased traffic of park visitors) and an apartment building does not fit in this area for several reasons that have been outlined by many residents - the most critical of which to our wellbeing is the noise (also caused by increased traffic) and parking issues have plagued the area since the redevelopment of MJ McNerney reserve (in sharp contrast to the redevelopment of St Clair playground and skate park which has ample parking). The residents that have raised these issues have effectively been told (repeatedly through copy and paste) that it is 'out of control' of the council, despite parking areas removed over the years and not reinstated leaving residents surrounding the park to suffer, or in the words of a council employee "shut up and put up with it". I encourage you to consider that this has not been addressed in the amended document you are reviewing.

Aside from my continued opposition to the excessive height of the dwellings, and the concerns I share with other residents, I predominately wanted to use this opportunity to insist that the expansion of 'green' space be used to develop a car park for MJ McNerney reserve visitors which appropriate gardening, speed calming measures and deterrents to hoon activities through limited navigation through a reasonable sized car park.

I genuinely hope that the submission in the current form is not approved but instead amended again to better consider the current residents of West Croydon and Kilkenny that live in the area and are most affected by a prospective development. Whilst many years have past with the site in its current derelict form, mere months or up to a year will not be a large sacrifice in order to ensure this is done correctly and in line with residents wishes. This is of course assuming rate payers matter, but by the judge of where this is going, it clearly doesn't appear that way.

Regards,

[REDACTED]

Simon Peters

10.05.2021

■ Wilpena Tce.

Kilkenny SA 5009

Draft Kilkenny Mixed Use (residential & Commercial) DPA-Submission

Hi there, my name is Simon Peters & I'm a 10 year resident of Kilkenny in directly affected geographically by the proposed Kilkenny Mixed Use (residential & Commercial) DPA.

While I appreciate the original proposal of 500 dwellings with a maximum height of 5 storeys has been scaled back to 300 dwellings & 4 storey maximum height I feel the site's location cannot support even the revised numbers.

This is based on the below:

1. The fact that this site is not serviced directly by main road/roads will cause massive intrusion on the existing neighbourhood roads.
This will occur due to the inability of cars entering & exiting both Pinda & Mundulla Streets and force vehicles to traverse back streets in order to access main roads (David Terrace., Torrens Road, & Rosetta Street).

The area can ill afford the vehicular congestion of an intensive housing development without significant upgrade to the road network.

- Cars banked up along David Terrace entering Mundulla Street will cause a safety hazard on this road with possibility of vehicles banked up south toward the railway line inviting accidents.
- Cars parked along Pinda, Mundulla & Aroona Streets will cause blockages in the traffic flow & present safety issues for both passenger and emergency service vehicles.

I also feel that the height & proximity of proposed apartments directly facing McInerney Reserve will compromise the integrity of the park and compromise the ambience of this wonderful asset to the community.

- I believe that people using the facilities of the reserve deserve to do so without the intrusion of residents in apartments towering over them and observing their every move.
- The park is already bursting with people using the facilities at peak times and an additional possible 600+ residents on the doorstep of the park looking to also use the park's facilities.

Summary

I believe the existing site without significant investment on infrastructure to facilitate seamless entry & exit to main roads will only support:

- A maximum of 200 dwellings
- Maximum height of 3 storeys
- Maximum height of properties directly facing McInerney Reserve to be 2 storeys
- The mandatory required 12.5% greenspace to not include the proposed Greenway Connection adjacent to the railway line.

Best Regards
Simon Peters

From: [Tracey Nearmy](#)
To: [Jim Gronthos](#)
Subject: Draft Kilkenny Mixed Use (Residential and Commercial) DPA - Submission"
Date: Monday, 10 May 2021 8:53:34 PM

Hi Jim,

Thank you for considering this submission to the Draft Kilkenny Mixed Use (Residential and Commercial) DPA.

My property at [REDACTED] Mundulla St Kilkenny, shares a direct fence line with the proposed rezoned area and I will be directly affected by this development.

My house was built in 1860 and is one of the original dwellings in the area, it also has a grapevine growing in the back yard, which may have been planted at the same time at the house was built. This would make it one of Adelaide's oldest living vines.

While I appreciate there has been a reduction in the size of this proposal, still believe that the existing infrastructure will be unable to cope with a development of this size. I do not agree with this amendment.

The streets become unmanageable and congested as it is when there is any kind of event in the area let alone with the increased traffic of a development of this size. The possibility of 300 extra cars parking on our narrow streets is nightmarish.

The foundations of my property are extremely delicate and the increased traffic as well as the heavy machinery that will have to access the area is of great concern.

The height of the development is also of concerning, and I would not like my property to be overlooked by a development of this height.

Please consider the wonderful and delicate heritage value of this area when considering this proposal.

Once it's gone you can't get it back.

Kind regards,
Tracey

[REDACTED]

Re: Kilkenny Mixed Use DPA – Rezoning Proposal
Additional feedback relating to the revised Draft DPA

Christine Braham – Resident
■ Alfred Road, West Croydon

Traffic Implications

The reduction in the maximum number of dwellings in the revised DPA is a welcome improvement. There will however still be a considerable impact on traffic flow into neighbouring suburban streets and also onto David Tce, which is already congested at peak times,.

As I commented in my original submission, with the added congestion onto David Terrace, people will seek alternative routes via Rosetta Street, a subway street under the rail line, to get to Port and Torrens Road. As a result of these concerns expressed in a number of submissions, revised traffic flow data was sought by Council with the revised DPA which has a reduced number of homes. It is interesting that the estimates of traffic generation rates are sourced from “Roads and Maritime Services of New South Wales (formerly RTA) “Guide to Traffic Generating Developments – updated traffic surveys 2013”. This appears to be a rather out of date source. Since that time, vehicles have greatly increased in size with more SVUs and large four door utilities. The Traffic Engineering report using this guide, stated that increased traffic flow would be within the acceptable limit of 1500 vehicles/day. However, this would still be a considerable increase on current flows. It is likely to also include an increase in the number of service vehicles associated with the new businesses in the development. Hence there will be a greater intensity of traffic along Alfred Road, which is already heavily used by vehicles seeking alternative routes.

With just the current volume, there are dangerous situations at the roundabout at the corner of Rosetta Street and Alfred Road. With cars parked on both sides of Alfred Road near this intersection, cars from Rosetta Street turning into Alfred Road often must break suddenly to avoid a car coming towards them, there being only space for one car between the parked cars. With additional traffic in both directions such hazardous situations will increase.

Public Open Space

In the revised DPA there is provision for 12.5% Public Open Space which is the minimum requirement. This is made up of a small extension to McInerney Reserve, which is at the edge of the proposed development area. This means that open green space will not be required throughout the housing development and so limit the opportunity for the planting of trees, grass and other greenery, which would provide cooling, aesthetic and other important environmental benefits. The 12.5% is also comprised of the current bike-way adjacent to the railway line. This is a sealed pathway and so provides limited opportunity for similar green space benefits.

There is precedence for the Minister to require additional public open space in significant housing developments. In this case, it should be noted that there is already a heavy use of McInerney Reserve by existing residents and even those further afield in suburbs such as Bowden and Brompton. It is likely that those who move into homes in this development will be younger and more active and be greater users of such outdoor resources. The small extension of McInerney Reserve does not adequately provide for this anticipated increased use.

It is disappointing that there is no provision for any aquifer for water recycling to make better use of storm-water run off. With the limited green space provision in this DPA, there will be little opportunity for absorption of rain throughout the development due to hard surfaces and instead there will be considerable storm water run-off and wastage.

From: [Tony Williams](#)
To: [Georgina House](#); [City of Charles Sturt](#); [Jim Gronthos](#)
Cc: [Croydon EO](#); [Paul Sutton](#); [Bruce Williams](#)
Subject: Submission on "KILKENNY MIXED USE (RESIDENTIAL AND COMMERCIAL) DRAFT DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)- FOR APPROVAL"
Date: Monday, 10 May 2021 12:23:39 AM

Dear Mayor Evans, Councillors and Council staff involved with this Project

Re Council resolution 27/4/2021:-

"4.06

KILKENNY MIXED USE (RESIDENTIAL AND COMMERCIAL) DRAFT DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)- FOR APPROVAL

Motion

- 1. That the approval package for the Kilkenny Mixed Use (Residential and Commercial) Draft Development Plan Amendment (Privately Funded), contained in Appendices A, B and C of this report, be endorsed and submitted to the Minister for Planning and Local Government for approval in accordance with Section 25(13) and (14) of the Development Act 1993.*
- 2. That the draft covering letter from the Chief Executive Officer contained in Appendix D be sent to the Minister for Planning and Local Government.*
- 3. Any formal submissions or deputations received by Council up to and including 10 May 2021 be included as an Appendix to the Development Plan Amendment for the Ministers consideration.*
- 4. That Council consider the Item at the Council Meeting of 10 May 2021."*

We refer to our past submission listed as Item 21 (page 73) in 19/4/2021 Report Attachment B to the City Services Committee and my (TW) personal presentation to the CS Committee on Monday eve 18 May 2020 on this important matter.

We have been West Croydon residents since 1982. We wish to register our objections and concerns of the latest 2021 development proposal. This follows the original request from the proponent Gregsand Pty Ltd for the residential and retail/ commercial development of the area of Kilkenny properties combined known as the "Bianco Site". While it is appreciated that recently the density of the proposal and additional open space requirements on the site has been carefully reviewed and proposed density reduced and open space criteria added from the 2020 proposal, we still have major concerns.

We and many other residents are keen to see improvements soon on the long abandoned large vacant industrial site(s) that caused local neighbourhood problems with sundry

criminal activities, arson, trespassing, dust nuisances and the worst eyesore blight in the City of Charles Sturt. Thousands of train commuters and motorists on adjacent Kilkenny Rd/ David Tce pass by the imposing site daily. The motorists held up at the train crossing and pedestrian/ cyclist activated traffic lights get an even more closeup view as the traffic is halted several times each hour.

It has been over 12 months since the past consultation by Council with Kilkenny and West Croydon residents about the development proposal on the industrial site and allied properties known collectively as the **“Bianco site”**. At short notice after learning of the Council resolution 27/4/2021, we had more discussions with nearby residents. We have the following ongoing concerns on the details of the proposed development to be considered by Council before it is presented to the Minister for Planning and Local Government for approval: -

1. Considering the proposed high density with a conservative estimate of an additional 600 residents plus the proposed commercial area visitors to the population of Kilkenny of 1,660 (2016 census) - we ask that Council change the name of the development site to **“Biancville”**. The proposed development of 300 apartments plus retail/ commercial areas is alien to and clashes with the amenity of the adjacent residential character and low density of homes in the old village of Kilkenny that features old cottages, maisonettes, villas, bungalows and residential architecture from many past decades to well over 100 years old.
2. *“A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road,...”* we consider this proposed building height amendment is still too high. The resultant density of population plus the retail and commercial areas’ visitation combined we believe is too overbearing for the aesthetics and also traffic generation impact for both the old established Kilkenny Precinct and West Croydon neighbourhoods.
3. Is undercroft car parking proposed in this area too? That would have the potential for the proposed four storeys to be even higher than an average for modern multi storeys apartments depending where ground level is defined. The consensus among many of the local residents we have interacted with in 2020 and reaffirmed recently is that **three storeys maximum** is acceptable.
4. *“Anticipated Total vehicle movements”* .. in the 27/4/2021 Council C S Committee Report it was stated in *“Table 1: Summary of Changes”* etc that the anticipated and estimated *“traffic movements are consistent with Council’s Transport Strategy for local roads”*. We have difficulty in comprehending that statement as the Kilkenny Streets nearby the development are very narrow and created well over 100 years ago eg Aroona Rd, Mundulla St and Yarcowie St are barely just over **5 metres wide**. These are not clear two lane “local” roads. They are not average local roads in the City of Charles Sturt and better defined as restricted access narrow lanes. West Croydon streets are also impacted negatively by the proposed site development by generating future increased traffic congestions, more speeding cars (already an issue here) and on street car parking creating potentially hazardous conflicts.

5. There are already on street car parking issues in multiple streets adjacent to the site creating obstacles and risks for passing through motorists currently especially for access and egress to busy David Tce. Kilkenny Rd/ David Tce is a very busy arterial road now. There is a bottle neck for traffic as the four lane road merges to two around both the train and cyclists/ pedestrian road crossings. This arterial road's traffic flow current problems would be greatly compounded with more visitors to the proposed retail / commercial and residents and visitors, deliveries etc to the new residential / commercial estate ("Biancoville"). This important arterial road's traffic is halted with every passing train on the Grange/ Outer Harbor lines and regular cyclist/ pedestrian crossing activation multiple times per hour.
6. Open Space – Next to the development site is M J McNerney Reserve (2.45 hectares). We appreciate that contrary to the 2020 proposal, it is now recommended that Open Space is included on the development site footprint by installing the *"desired greenway connection adjacent to the railway line and desired expansion of M J McNerney Reserve" for the full 12.5% legislative requirement*". If Council and the Planning Minister agree that we are aiming for a best practice urban development there, we request that the developer is reminded that the 12.5% legislative requirement is a minimum requirement. We assume the 12.5% is based on the land footprint and not the sq metres footprint on the total of 300 multi storey apartments and adjoining retail/ commercial built infrastructure?
7. Kilkenny and West Croydon residents seek an improved balance in the community benefit of the proposed development. We request that our past submissions and our further concerns listed here are seriously considered and included for the final guidelines preparations for the development sites. We and many other Kilkenny and West Croydon residents do not want the amenity of our neighbourhood to suffer. Kilkenny and West Croydon residents do not want the development of the delapidated site to be detrimental to our local area with urban planning and traffic management problems imposed on our neighbourhood by inappropriate building densities and multi-storeys apartment towers etc. We seek Council and the SA Planning Minister's support for a best practice "value adding" development and "win/win./win" overdue outcome on the historically neglected site and its allied properties.

Thank you for your consideration. We look forward to learning of the next progress steps on this matter.

Please do not hesitate to contact us for any queries.

Regards

Tony Williams and Kip Fuller

Rowell Crescent, West Croydon 5008

'Draft Kilkenny Mixed Use (Residential and Commercial) DPA - Submission'
From Tracey Davis and Eugene Suleau of [REDACTED] Wilpena Terrace, Kilkenny.

SUBMISSION

I thank the City of Charles Sturt for addressing the issues that the community raised regarding the Bianco site DPA. The reducing in housing numbers is a welcome adjustment to the overall DPA as is the inclusion of 12.5% greenspace on top of the Greenway bike track and the reduction in commercial premises on site.

Today's economy revolves around the re-building of our city, often with lower quality housing as a form of business. This employs a certain amount of people and makes some rather wealthy. It keeps our inflated economy afloat and house prices are on a constant rise. While there are justifiably calls for more housing what is being build is often of a poor quality with little planning included to address the coming and even current effects of climate change on Adelaide the capital of the driest state in the driest continent on the planet.

In years to come I fear we will regret our need to live in an economy based on a neoliberal and market agenda while we disregarded what is real in the world around us. The birds, the plants, animals, people, nature, and the wellbeing of all that we are meant to be caring for. With the low-cost housing that we are constructing will we not have to just re-build it all over again in the future to be viable in a climate change environment.

- The inclusion of green spaces for cooling,
- the saving of rainwater for re-use in the home,
- building homes that are light in colour to deflect heat,
- having mandatory solar panels and batteries installed in new buildings to power the home,
- installing large canopy trees to shade these homes
- Building passively to reduce energy use
-

All of these things would greatly improve our new building developments.

While I am aware that state legal requirements regarding housing, traffic and the environment are being met for this project, I feel **there is a loss of amenity and a loss of enjoyment for existing residents of the Kilkenny area**. Many of us have vocalised our disagreement to this development and while we have been partially heard I feel that we are being provided a tokenistic change to the overall design. I agree without our local politician Peter Malinauskas MP that we need to get this DPA right.

We can all do better and we should all be doing better in regards to climate change.

While I have stated this before in brief, I believe the issues of this project include:

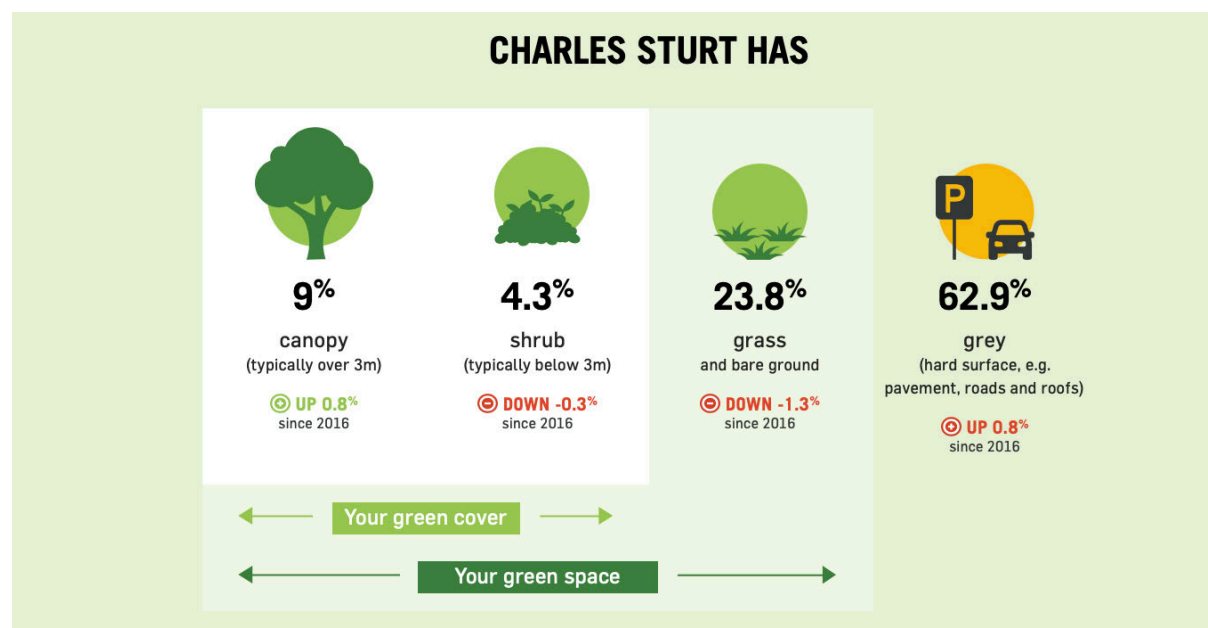
- Unsuitable Heritage Roads
- The Urban Heat Effect
- Water Sensitive design needs
- Car Parking & Urban Traffic
- Green Space (given the 30-35% population increase)

HERITAGE ROADS: Narrow road that are currently inaccessible to a lot of traffic. With potentially another 600 cars in the area I fail to see how traffic will easily navigate streets such as Mundulla.

CAR PARKING: It is roughly estimated that we would potentially still have around 300 extra cars parking on the new streets developed within the new building space, with any overflow taking up space on existing streets. *(My understanding is that there will be 1.25 car parks available for the 1-to-2-bedroom apartments and 1.5 car parking spaces for the 3-bedroom dwellings. The .5 or .25 parts of the car park will be I believe on public roads. As many homes will have more than two cars they will have to park on the street.)*

POPULATION INCREASE: **There will be a loss of amenity and a loss of enjoyment for** existing residents when there is a massive increase in the population and traffic on local streets and in the nearby M.J. McInerney Reserve. Essentially, we have lived in a small community which is being turned into a small city centre.

GREEN SPACE: Given the 30-35% population increase there will be a great demand on McInerney Reserve for new residents. The park is currently struggling with parking for visitors and the amount of use it incurs often by people who do not live locally. The City of Charles Sturt is 62.9% hard surface. We sit second to last for greening in our state according to Greener Spaces, Better Places web site at: www.greenerspaces.com.au



https://www.greenerspacesbetterplaces.com.au/wwattb/city-of-charles-sturt/?fbclid=IwAR3w-NYE1eIPaarU4_rvDU_UqRPEUh-CQMjnrGjte-6lcG_3bSy-cBb3RzQ

The new Building and Planning Code will come into place on the 1st of July. This plan has new requirements for extra greening to be applied by builders. It would be great if the project's approval could be delayed until the new financial year.

HEAT EFFECT: Our suburb will become hotter without the addition of extra greening into the project plans.

It should be clear to Councillors and the council administration how invested the residents of this part of Kilkenny are in their community. Community cohesiveness is at the core of the many projects residents here engage in. Indeed, we have been the recipients of many of Council's Placemaking grants that seek to promote ownership by residents of their community. This has seen murals, stobie-pole painting, water-balloon fights, and community gardens as examples of how Kilkenny residents want to make life better for the people who live here. These same people are concerned about the proposed draft changes because of the way this development will change the face of the community and the way that we are able to enjoy it.

Council has one chance to get this right. It will be of no use to anyone if in five years' time the council realises that it made a mistake in allowing so many dwellings to be built, with all the problems that that entails. Whatever is built there needs to fit in with the way current residents live their lives, and with the way they wish to see the suburb develop in the coming years. Forcing current residents to accept something they don't want is a lose-lose situation for everyone.



FOR A BETTER WORLD



Level 11, 2 Southbank Boulevard
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PH + 61 3 9247 4777

Visy Glass Operations (Australia) Pty Ltd ABN 94 004 230 326

WWW.VISY.COM.AU

10 May 2021

The Chief Executive
City of Charles Sturt
PO Box 1
Woodville SA

Attention: Jim Gronthos and Bruce Williams

By email: jgronthos@charlessturt.sa.gov.au; bwilliams@charlessturt.sa.gov.au

Dear Mr Gronthos and Mr Williams

**RE KILKENNY MIXED USE (RESIDENTIAL AND COMMERCIAL) DRAFT DEVELOPMENT
PLAN AMENDMENT (DPA) PRIVATELY FUNDED
– REQUEST FOR FORMAL CONSULTATION PROCESS**

We are writing to you in relation to the Kilkenny Mixed Use (Residential and Commercial) Draft Development Plan Amendment (DPA) Privately Funded (**Amended DPA**).

Visy Glass Operations (Australia) Pty Ltd formerly known as O-I Operations (Australia) Pty Ltd (**Visy Glass**) continues to have critical concerns with respect to the proposed rezoning. We have now had time to review the Amended DPA and it appears that it contains significant changes. We therefore request additional time to consider the Amended DPA and provide a submission to Council.

In any event it seems that a formal, public consultation process with respect to the Amended DPA would be appropriate.

We note that in contrast to the public consultation process for the DPA between 6 February 2020 and 14 April 2020, only select parties have been contacted by Council for comment on the Amended DPA and they have only been permitted a period of just over 2 weeks to do so. This is wholly inadequate.

Visy Glass reserves its rights to initiate judicial review proceedings in the event that Council proceeds to endorse the DPA without an adequate consultation process with respect to the Amended DPA.

Yours faithfully

Alana Morgan
General Counsel – Visy Glass