

14
If calling please ask for:
S/O Andrew Sharrad

Telephone: 8204 3611
Fax: 8204 3781
Email: communitysafety@samfs.sa.gov.au

8th August 2018

Re: Brompton Mixed Use (residential and commercial) development plan amendment – Public Consultation

The MFS has the following comments re the Residential City-wide Policies Development Plan Amendment for public Consultation letter dated 1st August 2018

Attn: Craig Daniel

Dear Craig,

This Department is in receipt of your information regarding the above. We thank you for drawing our attention to the Brompton Mixed Use (residential and commercial) development plan amendment.

The only areas where the Fire Service could comment are in relation to building approvals, water supplies for fire fighting and emergency services appliance access.

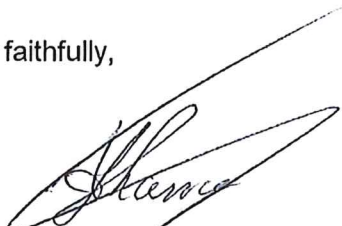
All buildings should comply with the requirements of the National Construction Code of Australia.

Where heritage buildings are identified then this Department strongly recommends that the Council's building surveyor, the building owner and the Fire Service form a committee to develop a fire safety package for these specific buildings.

It is expected that SA Water will be supplying street mains with the normal fire plug access and that the Department of Road Transport will maintain adequate roadways for emergency vehicle access.

For clarification of this report or further advice on any fire safety matter, please contact this Department.

Yours faithfully,



Senior Fire Safety Officer Andy Sharrad FIFireE
EngTech Grad. Cert. Fire Safety Engineering
Fire Safety Officer | Community Safety & Resilience Department
South Australian Metropolitan Fire Service | 99 Wakefield Street, Adelaide SA 5000
Ph: (08) 8204 3611 | F: (08) 8204 3781 | Mob: 0408821015 sharrad.andrew@samfs.sa.gov.au

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John Tagliaferri

From: Rushforth, John (Housing) <John.Rushforth@sa.gov.au>
Sent: Monday, 3 September 2018 11:07 AM
To: John Tagliaferri
Subject: DPA Bowden-Brompton Mixed Use (Residential and Commercial) DPA

Hi John

re: Bowden-Brompton Mixed Use (Residential and Commercial) DPA

herewith are comments on the above dpa from the affordable housing team in SAHA.

I trust all is well with you. Hope to catch up with you in the near future.

Kind regards

John

Comment

Affordable Housing

The SA Housing Authority provides strategic and technical advice on the development of affordable housing and advocates for policy that supports the delivery of affordable housing outcomes. The purpose of the affordable housing policy is to generate supply of housing that is affordable to low - moderate income households and encourage a greater diversity of dwelling types and housing options.

To support Affordable Housing (and a greater diversity in dwelling types and housing options), development incentives such as density increases (smaller lots or increased height allowances), reductions in car parking requirements and or zero lot lines can be very effective in encourages and supporting affordable supply.

The Development Plan Amendment will extend the existing Urban Core Zone and the area being rezoned will be covered by the Affordable Housing Overlay policy and map.

In the Bowden / Brompton area, the underlying land values are relatively high. When the land is developed, the combined value of the more traditional land sizes and traditional townhouse dwellings will likely exceed the Affordable Housing Price Point (currently set at \$332,000, or \$382,000 for properties that meet certain criteria). Affordable Housing will likely be met in this Zone through the supply of medium – high density apartment buildings that are designed to achieve affordable price points. The density and maximum building heights in this amendment can generally support this, however, assessment experience and previous development evidence suggest Affordable Housing is best pursued when linked to an incentive to deliver it. Affordable Housing incentives provide the relevant assessing authority and the developer greater ability to plan and negotiate the delivery of affordable housing outcomes.

The SA Housing Authority is currently working with DPTI to ensure Affordable Housing is included in the Zone section in the new Planning and Design Code. For this particular DPA, the following suggestions are made to encourage and strengthen the supply of Affordable Housing in Bowden/Brompton:

Urban Core Zone

INSERT in OBJECTIVES

1. A mixed use zone accommodating a mix of employment generating land uses and medium to high density residential development, **including affordable housing**, in close proximity to a high frequency public transport corridor.

INSERT IN DESIRED CHARACTER

Affordable housing to be included in Desired Character for the zone

INSERT in Incentives, PDC 31, Urban Core Zone

A residential development stage or building that incorporates a minimum of 15 per cent Affordable Housing can add 1 storey in additional building height.

Principles of Development Control

INSERT in PDC

Development comprising 20 or more dwellings and or land allotments should include a minimum of 15 per cent affordable housing as per the Affordable Housing Overlay and where designated on the relevant Overlay Map(s) – Affordable Housing.

Affordable Housing Overlay

Include an Affordable Housing Overlay and relevant map over the designated area.

Summary

Overall, the SA Housing Authority encourages the Bowden Brompton area, subject to this DPA, to be captured through an Affordable Housing Overlay that is supported by Objectives and Principles of Development Control in the Urban Core Zone to assist developers and Council to negotiate viable affordable housing outcomes. This will enable affordable housing to be addressed as part of future development.

John Rushforth

Senior Urban Planner

**Transaction and Property Services
SA Housing Authority**

Phone: 08 8207 0212

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Our Ref: REB 027.18

14 September 2018

The Chief Executive Officer
City of Charles Sturt
PO Box 1
Woodville SA 5011

By email only: jtagliaferri@charlessturt.sa.gov.au

Dear Sir/Madam

DRAFT BOWDEN – BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DPA - SUBMISSION

Thank you for providing the opportunity to SA Power Networks to comment on the above project.

SA Power Networks may be impacted by proposed zoning changes in its capacity of operator of the State's electricity distribution network or, alternatively, as a landowner/occupier. Irrespective of the tenure arrangement, all of SA Power Networks' land interests will be directly related to the operation of the electricity distribution network.

It is not practical for SA Power Networks to review every DPA to the extent necessary to comment on its individual property ownerships/occupations or infrastructure impacts. Accordingly, this response has been prepared to draw attention in a general way to the matters which SA Power Networks believes should be taken into consideration in progressing the proposal.

SA Power Networks takes its obligations to meet future electricity demand very seriously. You will appreciate that *any* infill or green field development will necessarily require a corresponding upgrade of the electricity distribution network (which may involve the setting aside of land for a new substation).

Whilst the DPA may flag potential development of this nature, prospective developers and those approving developments should give consideration to the current network capacity, the long lead times in meeting any increased load demand, and the requirement for developers to contribute towards augmentation of the upstream electricity network along with funding direct costs associated with extension/connection of electrical infrastructure specifically for their development. Developers should contact SA Power Networks' Builders and Contractors line directly in this regard on phone number: 1300 650 014.

It is preferred that developers refer to the SA Power Networks Distribution Annual Planning Report for up to date augmentation information. This is a public report available at the following link:

http://www.sapowernetworks.com.au/centric/industry/our_network/annual_network_plans/distribution_annual_planning_report.jsp

Should you have any queries or require any further information, please do not hesitate to contact me on (08) 8404 5642 or by email at mandie.busby@sapowernetworks.com.au.

Yours sincerely



Mandie Busby
Real Estate Advisor



www.sapowernetworks.com.au



Government of South Australia

Department of Planning,
Transport and Infrastructure

*In reply please quote: #13083698
Enquiries to: Nadia Gencarelli
Telephone: 7109 7036*

Development Division

Level 5
50 Flinders Street
Adelaide SA 5000

GPO Box 1815
Adelaide SA 5001

Telephone: 08 7109 7007
ABN 92 366 288 135

<http://www.dpti.sa.gov.au>

Mr Paul Sutton
Chief Executive Officer
City of Charles Sturt
PO Box 1
WOODVILLE SA 5011

Attention: Mr John Tagliaferri

Dear Mr Sutton

CITY OF CHARLES STURT – BOWDEN – BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DEVELOPMENT PLAN AMENDMENT

Thank you for providing the Department of Planning, Transport and Infrastructure (the Department) with an opportunity to comment on the Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA).

The relevant sections within the Department have been consulted and our agency comments are provided below and in Attachment A – Agency Comments.

Planning Reform considerations

As the Council is aware, the Department is currently working with all Councils on a program of transitioning existing Development Plans to a new Planning and Design Code (the Code). The Code is a central feature of South Australia's new planning system, becoming the State's single planning rulebook for assessing all development applications. It will transform complex, inconsistent planning rules found within the 72 Development Plans into a single, easy-to-access set of rules that can be applied consistently across the State. The Code will be in place by July 2020.

Whilst the new policies proposed in this DPA are generally supported, Council should be aware that when the Development Plan is transitioned to the Code the format of these (and all existing) policies will be updated to reflect the new planning system. In particular, Council should be mindful that Desired Character Statements and other local variation policies will be reviewed as part of the transition.

Council is also reminded that, given the progress of the planning reforms agenda, it is imperative that the DPA is completed in a timely matter. Should Council experience any delays with the DPA or the associated Infrastructure Schemes Pilot Project, the DPA may not be finalised and instead the rezoning may be completed either as part of transitioning Council's Development Plan to the Code, or as part of a future Code amendment process.

Transport considerations

The Department's Transport section (DPTI Transport) has indicated its general support for the rezoning of land in such close proximity to public transport and cycling networks. However, whilst it is appreciated that a traffic impact statement has been provided as part of

the DPA, DPTI Transport has identified that there are a number of matters that require clarification, modification and/or further assessment by CIRQA before its assessment of the traffic impact statement (and thus the DPA) can be completed.

In this context, please note that DPTI Transport has contacted CIRQA directly in order to obtain the necessary information. Depending on the outcome of this, some of the modelling that has been undertaken may require updating and the anticipated impacts (eg. potential upgrade requirements) further considered. The Department will therefore provide further comment in due course.

Some of the other investigations in this DPA are agency specific and the Department will be guided by their advice in this regard. Please note that there may be instances where discrepancies arise between the views of one government agency and another on certain issues. In such instances, please contact the Department so it can assist Council in resolving these issues (once all agency submissions have been received).

It is requested that Council's response to the Department's submission be included in the summary of agency submissions. Should changes suggested by the Department not be incorporated into the DPA, Council is requested to contact Nadia Gencarelli.

Following the consultation period, Council is required to consider submissions made and determine whether Council wishes to proceed with the DPA, and if so any changes that are proposed.

As noted in the Statement of Intent, government agencies must be provided with a summary of their submission and Council's response. In this regard, a copy of the relevant excerpt from the submission summary table would be appropriate. Further, if Council intends to make the agency's comments publicly available, Council should seek each agency's approval in writing, prior to release.

Approval Package

Information on the documents that are required to be submitted at the final approval stage can be found at the following web address:

http://www.saplanningportal.sa.gov.au/current_planning_system/planning_policy/practitioners_guide_to_preparing_development_plan_amendments

The information can then be accessed by referring to the Practitioners Guide to Preparing Development Plan Amendments PDF document and by accessing the templates and guides hyperlink.

The final approval package to the Minister should consist of the following documents:

- a covering letter
- the Amendment
- summary of Consultation and Proposed Amendments Report
- summary and response to agency submissions
- hard copy of all submissions
- a copy of the amendment instructions in track changes showing the changes made in response to consultation.

Please also note that, prior to submitting the final approval package to the Minister, you should submit all maps in Adobe Illustrator format and a copy of the Amendment Instructions to the DPA Mapping Coordinator (email:

DPTI.PDDPAMappingCoordinator@sa.gov.au). Authorised PDF maps will be returned to Council to submit as part of the approval package to the Minister.

Council is also required to ensure that the Local Member of Parliament has been consulted on the DPA. If the Local MP changes following consultation, a copy of the approval DPA should be forward to the current MP for comment, prior to lodging the final approval package.

Hand-over meeting

The Department encourages Council and/or Consultant to arrange a meeting with the relevant Planning Officer to discuss and hand over the approval package. This will ensure all documentation is included in the package and provides Council the opportunity to discuss the key issues arising out of the process.

If you have any questions on this matter, please contact Nadia Gencarelli by phone on 7109 7036 or email at nadia.gencarelli@sa.gov.au.

Yours sincerely



Andrew Humby
**TEAM LEADER, CODE TRANSITION
DEVELOPMENT DIVISION
DEPARTMENT OF PLANNING, TRANSPORT AND INFRASTRUCTURE**

20 / 9 / 2018

Att – A – Agency Comments

ATTACHMENT A – DPTI COMMENTS – CITY OF CHARLES STURT – BOWDEN – BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DPA

Policy Issues

No.	Section Ref	Issue	Discussion	Action required
1.	Agency Specific Issues	Many of the investigations in the DPA are agency specific.	<p>The Department will be guided on these issues by the advice of other agencies at the public consultation approval stage. Should Council elect to not adopt agency advice, this should be clearly justified in the Summary of Agency Submissions.</p> <p>The DPA should also establish clear and logical links between the investigations and the proposed policy changes and/or whether the issues are already adequately addressed by existing policy.</p>	
2.	Attachment A – Urban Core Zone Desired Character Statement	Length and detail of Desired Character Statement	It is noted that the additional text proposed for the Urban Core Zone Desired Character Statement is lengthy and detailed. Whilst acknowledging that the discussion is reflective of that applicable to other parts of the zone both in terms of content and structure (ie. West Lakes and the Bowden Urban Village), Council should be mindful that the format and function of such statements will change when the Development Plan transitions to the new Planning and Design Code.	Note

Mapping Issues

No.	Section Ref	Issue	Discussion	Action required
3.	Attachments G and K – Zone Maps ChSt/16 and 21	Incorrect zone labels	The zone labels for the Residential and MOSS Zones have been replaced with numbers; this should be corrected.	Replace numbers with 'R' and 'MOSS' accordingly.
4.	Amendment Instructions Table, Development Constraints Overlay Map ChSt/15 and Zone Map ChSt/15	Additional amendments required	It is noted that Zone Map ChSt/15 as contained in the existing Development Plan identifies a small portion of the affected area (near Chief Street) as Urban Employment as opposed to Urban Core. Similarly, the Development Constraints Map identifies the same land as 'Industry Interface' These maps should be updated and included in the final version of the DPA.	Update Development Constraints Overlay Map ChSt/15 and Zone Map ChSt/15 accordingly. Reflect amendments in the Amendment Instructions Table.
5.	Attachment L – Concept Plan Map ChSt/31	Minor amendments suggested	<p>It is noted that 'Potential Road Closures' are typically shown as xxxx (refer to Concept Plan Map ChSt/22 as example). Consider updating legend symbol for consistency.</p> <p>The 'Underground Stormwater Storage' symbol is not easily identifiable on the map, and it is suggested that a different colour contrast be used.</p>	Consider amending Concept Plan Map ChSt/31 for consistency and clarity.



Environment Protection Authority
GPO Box 2607 Adelaide SA 5001
211 Victoria Square Adelaide SA 5000
T (08) 8204 2000 F (08) 8204 2020
Country areas 1800 623 445

EPA 257-89

Mr Paul Sutton
Chief Executive Officer
City Of Charles Sturt
72 Woodville Road
WOODVILLE SA 5011

Dear Mr Sutton

Bowden - Brompton Mixed Use (Residential and Commercial) Development Plan Amendment

Thank you for providing the Environment Protection Authority (EPA) with the opportunity to comment on the draft Bowden - Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA).

The EPA understands the purpose of the DPA is to rezone the affected area at Bowden/Brompton from Urban Employment Zone to Urban Core Zone and make necessary policy changes. The rezoning and policy changes would enable residential and low impact mixed use development within the affected area.

When reviewing documents such as this DPA, the key interest of the EPA is to ensure that all environmental issues within the scope of the objects of the *Environment Protection Act 1993* are identified and considered. The EPA is primarily interested in the potential environmental and human health impacts that would result from any development that may be proposed subsequent to this DPA. At the DPA stage, the EPA works to ensure that appropriate planning policy is included in the development plan to allow proper assessment at the development application stage.

In respect of this DPA the EPA is interested in ensuring that interface between land uses, site contamination, and stormwater management are appropriately addressed through the policy changes.

Interface between land uses

The area proposed to be rezoned is currently the site of industrial activities, some of which are licensed by the EPA in accordance with the *Environment Protection Act 1993*. Those industrial activities have the potential to produce air and noise emissions that could affect nearby sensitive land uses.

The *Evaluation distances for effective air quality and noise management* (2016) contains recommended distances within which the potential impacts of air and noise emissions on sensitive land uses should be assessed.

The EPA has had discussions with Council about the potential impacts of the licensed industries on sensitive land uses within the area proposed to be rezoned and the evaluation distances that need to be applied to ensure those potential impacts are assessed.

Of the sites licensed by the EPA, Conroy's Smallgoods Pty Ltd, located at Seventh Street, Bowden, is the primary concern due to its potential odour and noise emissions, and because its recommended evaluation distance overlays the entire affected area. Hence, caution needs to be applied when assessing development for sensitive land uses within the affected area.

The proposed Desired Character statement for the Urban Core Zone identifies that activities with the potential for air and noise emissions are undertaken within the affected area. It is stated that measures will be undertaken to reduce the potential for conflict between the existing industrial activities and new sensitive development, and that it may be necessary to limit new development until existing activities cease or relocate. It is further stated that sensitive land uses will be designed to minimise negative impacts from those existing land uses.

In addition it is proposed that the Noise and Air Emissions Overlay be applied to the affected area. The *Charles Sturt Council Development Plan* (consolidated 13 September 2018) incorporates the Interface between Land Uses module, which contains policy to assist with assessment of air and noise emissions.

The potential impacts of air and noise emissions from existing activities on future sensitive remain an issue at the affected area, and cautious and careful consideration of the proposed and existing policy should be applied when undertaking assessments of future development.

Site contamination

The affected area has a history of industrial activities and a report, *Updated preliminary environmental assessment Bowden-Brompton redevelopment plan amendment* (22 May 2018)), which investigates site contamination has been prepared by Fyfe Pty Ltd.

The Fyfe report identifies the likely presence of soil and groundwater contamination, including the presence of two pug holes that would have been back-filled with waste. It is advised in the Fyfe report that many of the properties within the affected area would need to be subject to a site contamination audit.

The proposed Character Statement for the Urban Core Zone identifies that the Bowden/Brompton site may be subject to site contamination and that development should only occur where a site contamination audit determines that the site is suitable for the intended use. Proposed 'Concept Plan Map ChSt/31' identifies the approximate location of the pug holes. The Charles Sturt Council Development Plan also contains site contamination policy from the *South Australian planning policy library version 6* (September 2011). This policy approach is supported by the EPA.

The potential presence of site contamination remains at the affected area and the EPA supports the use of the proposed policy in the DPA to enable this issue to be addressed during assessment of any future development applications.

The EPA holds information on site contamination at the affected area that can be searched at https://www.epa.sa.gov.au/data_and_publications/site_contamination_index.

Stormwater management

A report, *Stormwater management masterplan Bowden/Brompton DPA investigations Preliminary* (21 May 2018), has been prepared by Fyfe Pty Ltd.

The stormwater management masterplan investigated stormwater management requirements at the affected area, including mitigation of flood and water quality impacts. The stormwater management masterplan proposes measures to manage stormwater including water sensitive urban design,

stormwater detention basins, and underground storage in Ethelbert Square.

The recommendations of the stormwater management masterplan are incorporated into the proposed Desired Character statement for the Urban Core Zone. The proposed Desired Character statement identifies the need to manage stormwater through water sensitive urban design, stormwater detention basins, and underground storage, and proposed 'Concept Plan Map ChSt/31' identifies the location of the stormwater management features. The Charles Sturt Council Development Plan also contains stormwater management policy, including water sensitive urban design, from the South Australian Planning Policy Library.

Whilst the EPA is supportive of measures to manage stormwater and supports the policies proposed in the DPA, it is recommended that stormwater management measures, especially those that would require earthworks such as for Ethelbert Square, consider the findings of site contamination investigations. This is in order to ensure that stormwater management measures do not interact with areas of site contamination, thereby contaminating the stormwater.

For further information on this matter, please contact Geoff Bradford on 8204 9821 or geoffrey.bradford@epa.sa.gov.au.

Yours sincerely

Kym Pryde

**PRINCIPAL ADVISER, PLANNING POLICY AND PROJECTS
PLANNING AND IMPACT ASSESSMENT
ENVIRONMENT PROTECTION AUTHORITY**

Date: 24 September 2018

27 September 2018

SAW 97/02114

The Chief Executive Officer
City of Charles Sturt
PO Box 1
Woodville SA 5011

Dear Sir/Madam

Re: Draft Bowden – Brompton Mixed Use (Residential and Commercial) DPA - Submission

I refer to your letter dated 1 August 2018 seeking our comments on the above DPA.

SA Water has previously provided comments to the Department of Planning, Transport and Infrastructure (DPTI) on the related Statement of Intent (SOI) in an email dated 21 March 2017.

SA Water currently provides water and sewerage services to the subject areas and recycled water to adjacent area. As per our previous response, networks augmentation will be required should the proposed rezoning generate an increase in demands. This is particularly so for the water distribution system, the extent of the augmentation works will be dependent on the final scope and layout of the future developments.

Our general comments in respect to new developments or redevelopments are provided below.

SA Water Planning

- SA Water undertakes water security and infrastructure planning that considers the longer term strategic direction for a system. That planning seeks to develop a framework that ensures resources and infrastructure are managed efficiently and have the capacity to meet customer requirements into the future. The information contained in the DPA document regarding future re-zoning and land development will be incorporated in SA Water's planning process.

Protection of Source Water

- Development/s shall have no deleterious effects on the quality or quantity of source water, or the natural environments that rely on this water. In particular, the following conditions shall apply:
 - Landfill shall be outside of Water Protection Zones;
 - Landfill area to include leachate collection facilities;
 - Effluent disposal systems (including leach drains) to be designed and located to prevent contamination of groundwater; and
 - Industry to be located in appropriate areas, with safeguards to ensure wastewater can be satisfactorily treated or removed from the site
- Development shall avoid or minimise erosion.
- Development shall not dam, interfere or obstruct a watercourse
- The Natural Resources Management Act 2004 includes wide ranging powers over source water quantity issues. The Department of Environment, Water and Natural Resources should be consulted, if

in doubt, over compliance with this Act. Source water quality issues are addressed by the Environment Protection Authority through the Environment Protection Act 1993.

Provision of Infrastructure

- All applications for connections needing an extension to SA Water's water/wastewater networks will be assessed on their individual commercial merits. Where more than one development is involved, one option may be for SA Water to establish an augmentation charge for that area which will also be assessed on commercial merits

Trade Waste Discharge Agreements

- Any proposed industrial or commercial developments that are connected to SA Water's wastewater infrastructure will be required to seek authorisation to permit the discharge of trade waste to the wastewater network. Industrial and large dischargers may be liable for quality and quantity loading charges. The link to SA Water's Trade Waste website page is attached for your information: [Trade Waste Overview](#)

Thank you for the opportunity to comment on Council's Bowden – Brompton Mixed Use Development Plan Amendment DPA. Please contact Peter Iliescu, Engineer, Wastewater Design Standards and Planning on telephone (08) 7424 1130 or email peter.iliescu@sawater.com.au in the first instance should you have further queries regarding the above matter.

Yours sincerely

per Daniel Hoefel

Senior Manager, Water Expertise

Phone: 08 7424 1889

Email: daniel.hoefel@sawater.com.au



Natural Resources Centre

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File reference: F0000177632

Unique ID: 18_066

Mr Paul Sutton
Chief Executive Officer
City of Charles Sturt
PO Box 1
WOODVILLE SA 5011

Dear Mr Sutton

Re: Charles Sturt Council Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment

I am writing in response to your consultation on the draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA). The following comments are provided on behalf of the Department for Environment and Water (DEW) and the Adelaide and Mount Lofty Ranges Natural Resources Management Board (the board).

It is understood that the purpose of the DPA is to rezone approximately 11.5 hectares of land from Urban Employment Zone to Urban Core Zone in order to allow for higher density residential and mixed use development.

The intent of the DPA is supported with the following comments provided for your consideration.

Heritage

As no State Heritage Places are located in the Study Area, Heritage South Australia has confirmed that it has no concerns with future development within the Affected Area of the DPA.

Existing vegetation

Page 18 of the DPA notes that given the former industrial nature of the area and the general lack of public open space, the existing trees in the Affected Area are considered to be worthy of retention. This is strongly supported. Where possible, additional trees and shrubs should be planted in order to contribute to Council's tree canopy cover, in line with Target 5 of the *30-Year Plan for Greater Adelaide – 2017 Update*.

Bowden Brompton DPA Investigations Final Report dated 2/7/2018 by FYFE

Page 22 of this report notes that DEW will be unlikely to issue permits for the taking of groundwater for domestic purposes in the Affected Area, although permits for drainage monitoring and industrial purposes may be approved. Advice from DEW's Water Licensing Branch has been sought regarding this, with the following comments:

The Affected Area is located within the Central Adelaide Prescribed Wells Area (PWA). DEW is currently preparing to issue 'existing user' licences within the Central Adelaide PWA. This means that only 'existing users'

(ie. those who took or committed to taking groundwater for a commercial, industrial or irrigation purpose during the qualifying period 01 July 2002 to 30 November 2005) and applied within the statutory period will be receiving licences. Please note that there are no existing user applicants within the Affected Area.

As such, I refer to section 2.3.6 (page 22) of the Final Report with the following notes:

- Groundwater take for domestic purposes is not licensed within the Central Adelaide PWA. Therefore, a licence from DEW is not required to take groundwater for domestic purposes (under 0.4 hectares) from existing bores.
- Groundwater take for commercial, industrial or irrigation purposes within this area will need to be licensed. As there are no existing user applicants within the Affected Area, licences for new groundwater take for such purposes will not be issued until a Water Allocation Plan for the Adelaide Plains region is adopted.

In relation to section 2.4.5 of the Final Report, please also note:

- As stated within this section, it is correct in stating that bore permits are no longer issued on the basis of the mentioned Groundwater Exclusion Zone.
- While well construction permits *may* be issued for industrial purposes (as the Groundwater Moratorium only restricts the construction of wells for domestic purposes), it should be noted that a well construction permit does not provide a licence for *take* of water from the new well. As such, it is generally recommended that well construction applicants determine whether they can receive a groundwater take licence (discussed in 2.3.6 notes) prior to proceeding with well construction and the associated investments.

Stormwater

Stormwater quality (pp 27-28 of the DPA) notes the *"EPA standard for stormwater pollutant reduction performance targets to be achieved"* have been considered as part of the DPA investigations. These targets align with the targets set out in the State Government's policy *Water Sensitive Urban Design – Creating more liveable and water sensitive cities in South Australia* and are strongly supported.

Additionally the *Preliminary Bowden-Brompton DPA Investigations Stormwater Management Masterplan* prepared by FYFE dated 21 May 2018 (the Masterplan) has been reviewed. The aim of the Masterplan was to investigate the capacity of the existing drainage system and future stormwater management requirements, including post-development stormwater management and flood mitigation measures, incorporating water sensitive urban design (WSUD) principles to accommodate future development of the Affected Area. This Masterplan is supported in principle.

Stormwater quality management (Part 4 of the Masterplan)

For your further consideration:

- it appears that only one bio-retention basin has been proposed for the entire development site, with gross pollutant traps and vegetated swales in detention basins. If this is the case, the stormwater pollutant reduction performance targets for the site will be difficult to achieve;
- additionally, a treatment surface area has been calculated for each sub-catchment. It is assumed that these surface areas have been calculated to assist in achieving the stormwater pollutant reduction performance targets. However, the surface area required to achieve the performance targets depends on the type of WSUD measures implemented. It is suggested that a concept layout detailing the WSUD measures would be beneficial. This could include modelling and results identifying the achievement of the treatment train proposed in each sub-catchment against the proposed targets within the Masterplan.

In order to reduce nuisance flooding, and maximise the passive reuse of stormwater, it is recommended that tree pits are provided for street trees and where practicable, permeable footpaths/street pavements are utilised; especially at sag points in the road profile (section 3.1.1) and in parking bays. This would help to green and cool the neighbourhood, and reduce any unwanted ponding.

Please note that we do not wish to speak at a public meeting in support of this submission.

If you require any additional information or would like to discuss these comments, please contact Kylie Rose, Policy Officer, on telephone (08) 8226 8551.

Yours sincerely


Louisa Halliday

MANAGER PLANNING & EVALUATION

On behalf of the Adelaide and Mount Lofty Ranges NRM Board

Date: 28 September 2018



DELIVERING AN
INSPIRING
URBAN FUTURE

Ref:

Paul Sutton
Chief Executive Officer
The City of Charles Sturt
PO Box 1
Woodville SA 5011.

28/09/18

Urban Renewal Authority
trading as Renewal SA.
Level 9, Riverside Centre
North Terrace, Adelaide SA 5000
GPO Box 698, Adelaide SA 5001
ABN: 86 832 349 553

T 08 8207 1300
F 08 8207 1301
E renewalsa.info@sa.gov.au
W www.renewalsa.sa.gov.au

Dear Sir,

**Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development
Plan Amendment (DPA) - Comments**

Thank you for the opportunity to comment on the draft DPA for the rezoning of the Bowden / Brompton industrial land.

Renewal SA is the developer of the nearby Bowden development comprising 16.1 hectares of former industrial land rezoned in 2012 to Urban Core Zone.

Renewal SA supports the orderly development of adjoining land to the north of Bowden / Brompton and is generally supportive of the proposed re-zoning of industrial land the subject of this DPA.

It would be our expectation that the development of this land does not place any additional financial obligations on Renewal SA or negatively impact Renewal SA's intended delivery of the Bowden project in accordance with the master plan for the project.

We look forward to meeting with Council to discuss any infrastructure and traffic related integration issues that will result from the development of the land the subject to the DPA.

Yours sincerely,

Shane Wingard
Project Director - Bowden



Respondent No: 1

Login: peter neuhaus

Email: p

m

Responded At: Aug 06, 2018 14:08:33 pm

Last Seen: Aug 06, 2018 04:18:20 am

IP Address: 127.0.0.1

Q1. Name peter neuhaus

Q2. Postal Address

Q3. What is your interest in this project? business

Q4. Please specify 'other' not answered

Q5. Please select your age category 55-64

Q6. Provide your written submission on the DPA here.

Generally agree with the plan and happy with the height limits proposes. My concern is largely around car parking. The existing Bowden developments have provided insufficient on-site car parks. As a result the streets become clogged with parked cars. It is 'dream time' to think people are going to use public transport more than what is achieved elsewhere in Adelaide. Many of the residents of the new Bowden developments are first home buyer young couples. Usually each person comes with a car, and are not prepared to give up this independence. So two cars per dwelling is the norm, and the second car is left on the street. Developers should be required to provide this level of car parking on-site. If residents don't have two cars I am sure the space will be used for other things like storage. Once the suburb is built it is too late to go back and built high-rise car parks. Also I am not in favour with the obsession for one-way streets, too many bike lanes and street 'obstacles'. Unless you change human nature, people will always want to be able to drive around their suburb, and that has become increasing difficult due to all the 'dream time' initiatives.

Q7. I found the information easy to understand Unsure

Q8. I had adequate notice to get involved with the consultation Agree

Q9. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q10. How could the consultation/activity be improved?

The brochure sent out was confusing and lacked detail. Should have included the map on page 83 of the main document.



Respondent No: 2

Login: Sarah Lennon

Email: [REDACTED]

com

Responded At: Aug 08, 2018 22:12:48 pm

Last Seen: Aug 08, 2018 12:14:45 pm

IP Address: 127.0.0.1

Q1. Name Sarah

Q2. Postal Address [REDACTED]

Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 25-39

Q6. Provide your written submission on the DPA here.

The DPA is generally fine, the variable height restrictions is good, although there should be provisions to ensure that no existing residential properties are overshadowed or overlooked as a result of the development. Traffic is going to continue to be an increasing problem with more residents in the area. City bound traffic in the morning along Hawker Street needs to be further addressed as part of this DPA. The freight trains no longer stopping at the crossing is helpful, but the current traffic light sequence at the level crossing is not constructive to good traffic flow, the lights are often red at the crossing when the other side could fit 10 more cars, so you can't go across due to the red light, then sit there long enough waiting such that a train eventually comes resulting in further waiting. The intersection should just have lights for trains coming so that traffic can cross the remainder of the time if safe to do so. If this is not possible the sensors that cause it to go red need to be reassessed so that they don't go on simply because there is a single bus south of the railway crossing. Further, changing the configuration of the intersection such that there is a left hand turn lane that continues on in front of the bus stop so that vehicles can continue with left hand turns regardless of if there is traffic waiting to go straight into War Memorial Drive. The other problem with the DPA amendments are how weak they are around the preservation of heritage buildings, the council and RenewalSA have proven to be completely at odds with the community in seeking to maintain historical buildings, the loss of the Art Deco Clipsal offices on Park terrace was a travesty that should never have happened and steps need to be taken to retain, preserve and restore existing contributory buildings, if in doubt then keep or consult more widely than those with a vested interest is demolishing the property.

Q7. I found the information easy to understand Disagree

Q8. I had adequate notice to get involved with the consultation Agree

Q9. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q10. How could the consultation/activity be improved?

not answered



Respondent No: 3

Login: kate-sp

Email: [REDACTED]

Responded At: Aug 30, 2018 15:57:19 pm

Last Seen: Aug 30, 2018 05:57:14 am

IP Address: 127.0.0.1

Q1. Name Kate Foster

Q2. Postal Address [REDACTED]

Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 65 plus

Q6. Provide your written submission on the DPA here.

1. Extra greening above 12.5% land use required. 25% of land use recommended p.83 Fyfe Report. The proposed greened areas in Study area need to be enlarged. 2. Building heights 2 storey from Hawker Street to Sixth Street, Up to 4 storeys Sixth Street to Second Street. Maximum 7 stories apartment buildings from Second Street to Port Road. 2 storey maximum building height facing any existing residential area. 3. Commercial, retail close to Port Road. 4. All townhouse and apartment blocks to have greening strips in front of buildings to avoid "enclosure effect" which now exists on Sixth Street. 5. All heritage buildings regardless of condition, to be kept, restored and incorporated into plan development. 6. Extra car parking for 2 and 3 bedroom dwellings ie. 1 for dwelling, 1 for visitor which is off-street. 7. No traffic from Urban Core and DPA Study area to be directed through existing Residential or Residential Character Zones but directed to main Collector Roads within the Urban Core and Study areas and main arterial roads. 8. Adelaide Brass Castings emission control distance by EPA to remain at 500m. 9. Conroys emission control distance by EPA to remain at 500m. 10. Detmolds emissions and noise controls to remain at 100m (not 30m) 11. Better positioned and more accessible pedestrian crossings over Park Terrace. 12. Local small shopping, cafes and restaurants along Hawker and Chief Streets. 13. Maximise rain catchment in Study area with rainwater storage tanks. 14. Given the development of the Study area is privately funded to ensure the government and council insist on a quality development for the long term future.

Q7. I found the information easy to understand Agree

Q8. I had adequate notice to get involved with the consultation Agree

Q9. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q10. How could the consultation/activity be improved?

not answered

Dear Mr Paul Sutton CEO,

I am writing to you about the Draft Bowden – Brompton Mixed Use (Residential and Commercial) DPA.

I do not have a problem with the changes you propose but would like to give the following feedback:

If you are going to allow for more high density housing then you need to make sure you also allow for more parks, playgrounds and other areas for young children and teenagers who will be living in apartments or flats without backyards or outdoor space.

I think this is very important.

Sincerely,



Sania Addin
Bowden



Respondent No: 4

Login: Peter Heylen

Email: [REDACTED]

Responded At: Sep 07, 2018 15:59:41 pm

Last Seen: Sep 07, 2018 06:16:15 am

IP Address: 127.0.0.1

Q1. Name Peter Heylen and Bev White

Q2. Postal Address [REDACTED]

Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 55-64

Q6. Provide your written submission on the DPA here.

Hi, Bev and I have discussed this and the feedback we provide takes into context the development we have seen and experienced around where we live at Ridleyton. We are pretty relaxed about the said new development except for 1 thing. CAR PARKING and EMERGENCY SERVICE ACCESS. For each residence there needs to be space for 2 full size (not Toyota Corolla size cars) car parks. We have units next door to us and we constantly have to park our own cars down the street because our neighbors in the units, who don't have room for 2 cars, park their cars in front of our house. Trust me this creates tensions between neighbors. I suggest you consider underground parking. The developers will say "this will cost us money". Well tell them to put up with strangers parking their cars in front of their place at all hours and it won't take them long to not see the humor of it. Adequate car parking will contribute to good neighbor relations a fact that seems to have been missed thus far by Charles Sturt Planners. And by getting vehicles off the narrow streets these developments seem to insist upon, will allow easy access to heavy vehicle like Fire Trucks.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm?

Q8. I found the information easy to understand Agree

Q9. I had adequate notice to get involved with the consultation Agree

Q10. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q11. How could the consultation/activity be improved?

not answered



19 September 2018

Chief Executive Officer
City of Charles Sturt
PO Box 1
WOODVILLE SA 5011

Dear Sir

Re: Draft Bowden-Brompton Mixed Use (Residential and Commercial) DPA – For Consultation

We act for the Felmeri Group of companies. Our client is a well known South Australian owned and operated residential construction company. The business specialises in the construction of affordable quality homes and in integrated land developments throughout Greater Adelaide.

Our client has entered into a partnership with the owner of property bounded generally by Drayton Street, Seventh Street, Eighth Street and Gibson Street Bowden ("our client's site"). Our client's site is shown on the **attached Site Context Plan**.

Our client's site is within the Affected Area of the Draft Bowden-Brompton Mixed Use (Residential and Commercial) Development Plan Amendment ("the draft DPA").

Our client has requested that we make this submission on its behalf in relation to the draft DPA.

Summary Position

In summary we support Council's initiative in preparing the draft DPA. It will in our opinion build on the success of the emerging urban form on the former Clipsal site at Bowden, which is being developed by the South Australian Government in partnership with the City of Charles Sturt.

Development Concept

Anthony Donato Architects has prepared an indicative concept for our client's site as shown on the **attached Site Feasibility**. The indicative concept proposes the development of three-storey residential apartments and the retention of the local Heritage Item at 78 Gibson Street. The concept is consistent with the draft DPA's Concept Plan Map ChSt/31 – Bowden-Brompton Urban Core Zone.

33 Carrington Street
Adelaide, 5000
P (08) 8193 5600
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Offices in SA | NT | QLD
ISO 9001:2015 Certified
ABN 30 007 755 277
plan@masterplan.com.au



51020LET01



This Concept Plan nominates our client's site for the development of 59, three-storey residential apartments.

Two apartment styles are proposed:

- Type 1 three-bedroom apartments; and
- Type 1 two-bedroom apartments (with the option of converting the study into a bedroom if so required).

The Type 1 Apartments have two undercover parking spaces (side by side) and the Type 2 Apartments allow for the undercover parking of two vehicles, one behind the other, in ranked format.

Potential exists for the provision of 10 visitor parking spaces behind the local Heritage Item. Noting that the Development Plan does not specify a requirement for dedicated visitor parking, this area could alternatively be set aside as community space in association with the adaptive conversion of the heritage building.

A pedestrian link through to Gibson Street is provided. The link connects onto Gibson Street at a point directly opposite Emu Park. Emu Park is a popular neighbourhood space and playground which is bounded by Eighth Street, Gibson Street and Seventh Street. Emu Park is shown on Concept Plan Map Ch/St/31 in the draft DPA.

The conversion and adaptive reuse of 78 Gibson Street imposes constraints on the apartments proposed near the corner of Eighth Street and Gibson Street. The seven apartments shown on the Site Feasibility plan closest to Gibson Street would front directly onto Eighth Street, with vehicle access to single width garages along this section of the street. With careful attention to building design and siting we are confident that a reasonable development outcome on this part of the site can be achieved.

All apartments with frontage to Drayton Street, Seventh Street and Eighth Street will have open-style front fencing to allow informal surveillance into the public realm.

Suggested Amendments to the DPA

1. Significant and/or Regulated Tree

A mature eucalyptus tree is close to the Eighth Street boundary and it may be significant/regulated. The tree is identified on the Site Feasibility plan. The draft DPA *Investigations* at Section 2.2.5 'Existing Vegetation' advises that potentially Regulated or Significant Trees "*are generally located close to boundaries and are associated with either residential properties or small individual allotments within the area not forming part of a larger consolidated site, with the exception of the tree adjacent Eighth Street*".



The draft DPA advises in the 'Summary/Policy Implication' box on page 18 that Regulated/Significant Trees have protection under the Development Plan, *Development Act* and *Regulations*, and that no additional planning policies are considered necessary. We do not disagree with this statement but make the obvious comment that the tree, if retained, would significantly constraint the site's redevelopment for medium density housing envisaged by the draft DPA.

Our client proposes to remove this tree on the grounds that "*all reasonable alternative development options and design solutions have been considered to prevent substantial tree-damaging activity occurring*", or alternatively that "*development that is reasonable and expected would not otherwise be possible*".¹

2. Conroy Smallgoods

Our client's site is located with frontage to Seventh Street, opposite Conroy Smallgoods Pty Ltd. The draft DPA Investigations under 'Air Quality and Acoustics', advises that Conroy Smallgoods is licensed by the EPA, and that "*an evaluation distance of 500 metres is recommended due to the potential for nuisance odour and smoke issues.... Based on the current technology in use, the EPA considers that the 500 metres evaluation distance should remain*".

The draft DPA proposes to insert additional paragraphs into the Bowden Urban Village Urban Core Zone Desired Character (Attachment A of the draft DPA). The paragraph which is particularly relevant to our client's site states:

"Established industrial uses within the Bowden/Brompton site, comprising a smallgoods facility on Seventh Street. . . , have the potential to produce odours and noise that could cause nuisance to future residents or sensitive land uses located in proximity to the activities. Efforts will be made to reduce the potential for land use conflict between these existing uses and new sensitive developments, recognising that the activities may limit or constrain new development until such time as the activities cease or are relocated. Sensitive land uses will be designed to minimise negative impacts from existing uses."

It is noted that the Conroy Smallgoods' site occupies land which is included in the draft DPA and is identified on the Concept Plan for five storey residential development.

Our client is concerned that on the one hand the draft DPA encourages residential development adjacent to Conroy Smallgoods, while on the other hand it signals that such development may not be possible "*until such time as the activities cease or are relocated*". We are also curious to know what specific measures are being taken, and by whom, "*to reduce the potential for land use conflict between these existing uses and new sensitive developments. . .*"

¹ City of Charles Sturt Development Plan (Consolidated – 30 January 2018). *General Section: Significant Trees* Principle 3(a)(v) and 3(a)(vi), and *General Section: Regulated Trees* Principle 2(d).



It is our expectation that the smallgoods facility may well be encouraged to relocate as a result of the substantial development uplift opportunity presented by the draft DPA. Unfortunately, we are in no position to know what Conroy Smallgoods may be contemplating in this regard.

For this reason, we request that we be informed of the *"efforts"* that are being or will made, and by whom and when, *"to reduce the potential for land use conflict"* presented by Conroy Smallgoods' continuing occupation and use of its site.

Closure

We confirm that we will be attending the Public Hearing to be held on Monday 15th October at 6.00 pm at the Civic Centre to elaborate on this submission on behalf of our client.

Yours sincerely

Graham Burns
MasterPlan SA Pty Ltd

enc: Site Feasibility Plan.
Site Context Plan.

cc: Felmeri Group.



- Subject Land
- Zone Boundary
- UC Urban Core
- RC Residential Character

Proposed Site Development
SITE CONTEXT PLAN

78 GIBSON STREET
BOWDEN

FOR FELMERI GROUP



1:1000 @ A3
0 20m

MASTERPLAN.COM.AU
SA | NT | QLD
© SEPTEMBER 2018 BL:51020 1.0



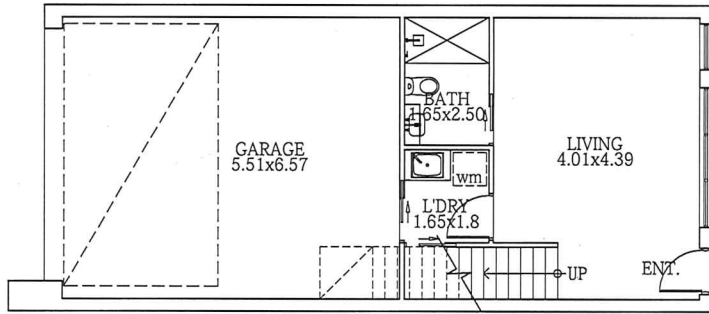
JOB TITLE
PROPOSED SITE DEVELOPMENT
CLIENT
FILMERI GROUP
ADDRESS
78 GIBSON STREET
BOWDEN, SA 5007

DRAWING TITLE
PROPOSED SITE FEASIBILITY

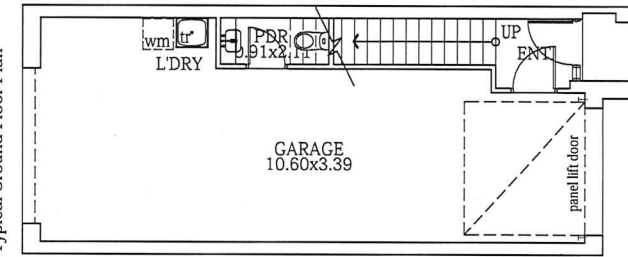


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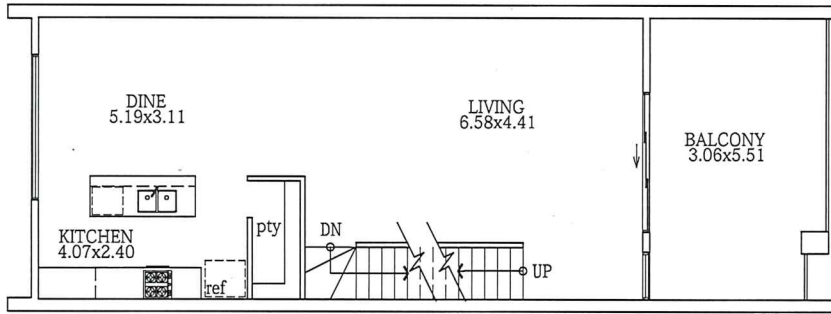
Unit Type 1
Typical Ground Floor Plan



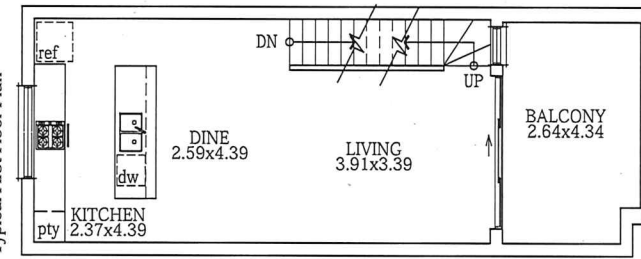
Unit Type 2
Typical Ground Floor Plan



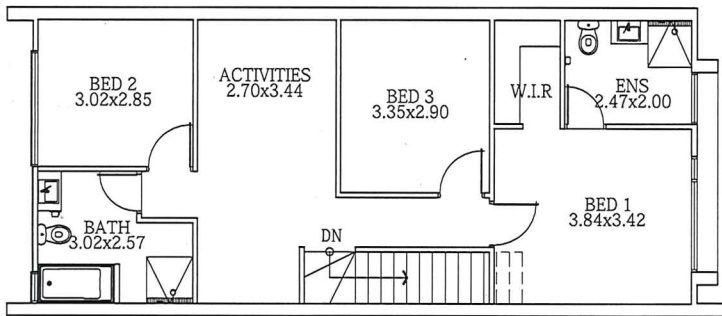
Unit Type 1
Typical First Floor Plan



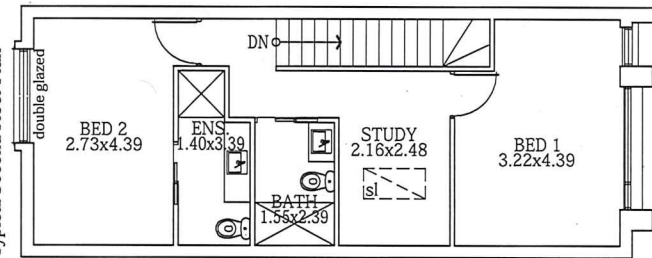
Unit Type 2
Typical First Floor Plan



Unit Type 1
Typical Second Floor Plan



Unit Type 2
Typical Second Floor Plan



DRAWING TITLE
PROPOSED TYPICAL UNIT TYPES 1 AND 2
GROUND FLOOR PLAN
FIRST FLOOR PLAN
SECOND FLOOR PLAN

Planning and Development staff submission on Bowden- Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA)

Staff have reviewed the proposed DPA and offer the following comments about possible application assessment issues with the proposed policy change.

Desired Character Statement

There is some concern about ability to deliver the Desired Character statement in relation to achieving building heights and integration with neighbouring policy areas or the already established Bowden Urban Village development also within the Urban Core Zone. There is currently no mention of desired building heights within the statement and these are solely drawn from the concept plan. Based on the concept plan it is our understanding that the built form is expected to be 2 storey to 3 storey in the northern and north eastern part of the affected area increasing to 5 storey to the west and where it interfaces with the established Bowden Urban Village area in the Urban Core Zone to the south. It would be better to include within the Desired Character statement words that reinforce the building heights envisaged in the concept plan.

While the Development Plan is intended to be a guide for development and not seen as a mandatory set of provisions the concept plans are even more of an indicative development layout and are not typically seen as a strong reference for exact delivery of policy intent. The Desired Character statement should be the vehicle for delivery of intrinsically critical elements of the desired built form outcome and should be amended to better capture desired building heights across the development area.

It is also noted that in the Desired Character statement at present the sixth paragraph refers to development in the southern periphery of the site being consistent with development forms and heights in the adjacent Bowden Urban Village. In the Bowden Urban Village these heights range from 2 to 8 and 3 to 6 storeys which potentially would allow for higher built form on this proposed Bowden- Brompton development area than desired or outlined in the concept plan.

Further, the Desired Character statement makes reference to the need to widen some road reserves (bottom of the eighth paragraph). However, it specifically mentions (in brackets) Second St, Sixth St, Drayton St and Third St. It neglects to mention Seventh and Eighth Streets, which will also require some road widening in accordance with the CIRQA investigations (Bowden/Brompton DPA Transport Investigations (July 2018)). This should be amended to capture these roads in addition to those already mentioned.

Ability to deliver the policy content

Given the new zone for this area affects land in multiple ownership the ability to deliver the various road upgrades, stormwater infrastructure and public open space areas envisaged for the locality will be problematic. Some parts of the area will have public open space and road widening while others won't and this will require agreement across all property owners in relation to contributing to the cost of these works, which benefit all, and absorbing possibly reduced dwellings site yields due to the impact of these works. In the absence of this being properly resolved through legally binding agreements it may be difficult to physically achieve all of the desired outcomes on the ground during the development application assessment process.

9.

'DRAFT Bowden - Brompton Mixed Use (Residential and Commercial Use) DPA – Submission'

Meeting re the Brompton proposed redevelopments

To: Chief Executive
City of Charles Sturt
PO Box 1 Woodville SA 5011

Principle

I support the overall principle of re zoning, and appreciate being able to respond to the redevelopment. I am not supportive of Core Zoning which allows the building of very high building.

This important redevelopment determines the future of a major portion of the Bowden/Brompton and surrounding areas of Ridleyton and Hindmarsh. I am assuming that the Council will attend to stormwater, drainage, electrical supply and disability access, thus I have not provided comment.

I would appreciate an opportunity to comment on the future Concept Plan and participate in future ongoing consultations.

I have copied the ownership map from the Fyfe Report and placed at the back of this submission.

History

Brompton was established in June 1849 and quickly grew. By October of that year, two thirds of the formerly "bare common ground [was] covered with substantial and genteel cottages, thriving shops and wells of excellent water." <ref name=Manning/>

The subsequent history includes low grade industry – not including the former gasworks near the railway line. Unfortunately many of the old cottages in the area have been removed. There are still some larger houses and bungalows in Chief Street which remain and add to the amenity of the area. Residential refers to a range of homes from early settlement to larger homes and bungalows built up to the early 1960s.

Thus development has the opportunity to be unique, quirky design, green and a desirable place to live. It can be complimentary to the Bowden/Plant 4 development. Whilst I support a mixed environment of residents, future residents will pay a premium to live in this environment. This development should be a contrast with the random developments in Churchill Road.

Consideration 1.0

The Desired Character Statement should consider that the proposed redevelopment is to be in keeping with the former character of the area and with the proposed redevelopment of the gas works site.

Zoning.

The brochure states and the Fyfe Report note that the whole site be re zoned to be an Urban Core Zone. I understand that this allows for residential and low impact commercial employment e.g. shops. Within the zone there are areas of old residential character. Preserve the character theme within the zone.

Consideration 2.0

This consideration relates to areas surrounding the DPA. It is recommended that the following areas are rezoned to Residential Character Precinct to ensure that the overall character of the Bowden/ Brompton community is enhanced:

- The area from Chief Street to West Street, bordered by Hawker Street and First Street
- The area between Chief Street and Coghlin Street, bordered by Hawker Street and Torrens Road.

It is recommended that all of the residential character be kept.

Heights of Buildings

The Fyfe Report and the brochure are not in complete accord as to the height of buildings. All of the streets, (apart from Chief Street) are narrow. The building heights should be no more than 2 storeys on the street frontages. The allowance for three to four storey buildings to be closer to the Bowden station, where some new roads and open spaces will need to be created. Chief Street is wider and could accommodate 3 story residential. Anything higher needs to be setback from the street and take into account planned open space to avoid a corridor of building impact. The developments on Churchill Road seem to be random buildings, placed to increase housing density and are not in accord with the character of the neighbourhood. This is not the development for Brompton.

Consideration 3.0

Housing heights to be no more than 2 stories due to the narrow streets apart from some set back developments by parks (or proposed parks).

People

A mix of people make a vibrant community - old to young, those who may not have much to those who are financially sufficient. Brompton has been a welcome place for all communities. The development should cater for all. In particular there should be some affordable housing.

Of special interest are families with 2+ children; this group generally requires 3 bedroom housing. It is recommended that the development accommodate housing that will enable families with children to stay in the area, this aiming for a mix of all age groups.

Consideration 4.0

The plan includes some affordable housing, and developments with 3 plus bedrooms.

Car Parking

Car parking in Brompton is a premium and due to narrow streets and is often in short supply. Whilst I am a firm believer in public transport, it is an URBAN MYTH that the area does not require more car parking. I am recommending that each house has two **off road** car parks. This will alleviate some of the parking issue that will arise if car parks are limited. An added benefit is that residents may be able to have visitors who can park off the street- particularly important for older visitors. Car parks could be considered a part of planned open space!

Consideration 5.0

All housing to have at least 2 car parks off road.

Green Space

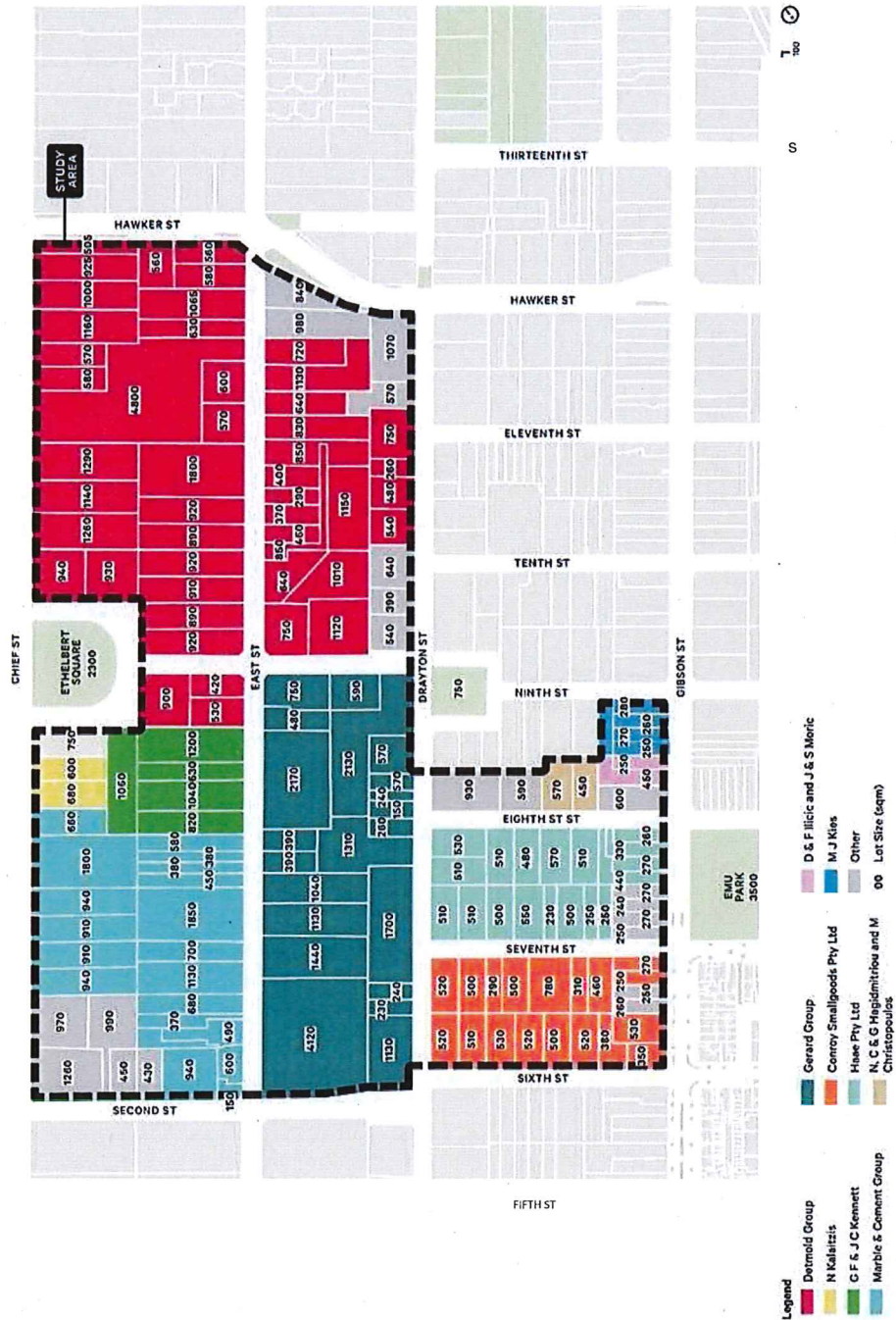
To build higher than 2 stories, extra green space is required to ensure that there is ample light, a feeling of space, areas for children to play and for the community to enjoy. I could not ascertain the amount of green space that would be allocated to the area. I understand that this will be part of a Concept Plan and that the possibility of flood mitigation will be considered. I support all green walkways and street plantings.

Consideration 6.0

The plan includes sufficient green spaces to accommodate the increase in population.

I will be speaking to these points at the public meeting to be held on Monday 15 October 2018 at 6.00pm at the Civic Centre on Woodville Road.

Elizabeth Joan Moran



HOLMES DYER PTY LTD

ABN: 30 608 975 391

Ph: 08 7231 1889

Level 3/15 Featherstone Place

Adelaide SA 5000

27 September 2018

Reference: 0120a-01

City of Charles Sturt

PO Box 1

WOODVILLE SA 5011

Attention: The Chief Executive OfficerBy Email: psutton@charlessturt.sa.gov.au

Dear Paul,

RE: DRAFT BOWDEN-BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DPA - SUBMISSION

Introduction

Thank you for providing the opportunity to comment on the Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA) that is on public exhibition until 28 September 2018.

Holmes Dyer Pty Ltd is providing this response on behalf of the six major landowners of the subject land. They are:

- Detmold Group
- Conroys Smallgoods Pty Ltd
- Marble and Cement Work Co Pty Ltd
- Nemeson Bowden Pty Ltd
- Park View Property Trust
- Kennett Pty Ltd

Council has prepared the Draft DPA to rezone a portion of the existing Urban Employment Zone within the suburbs of Bowden and Brompton in the Charles Sturt Council Development Plan to Urban Core Zone. This policy amendment change seeks to facilitate higher density residential and mixed-use development.

The landowners strongly support this change of zoning and encourage the Council and Minister to proceed expeditiously with the rezoning process.

Background

A Master Plan has been prepared for the existing Bowden/Renewal SA mixed use development located south of the subject site. The Bowden Master Plan proposes the construction of a new vibrant and dynamic urban village that will deliver a level of mixed uses and accommodate a range of functions, activities, housing typologies, and people. The Bowden/Brompton area is an ideal location for development and contains great potential to develop into a vibrant and attractive neighbourhood. Furthermore, the subject land has a unique industrial identity, is well-connected to the Adelaide CBD, and is in proximity to public transportation.

In general terms, the draft rezoning proposal of the Bowden–Brompton Mixed Use (Residential and Commercial) DPA will create a positive contribution by establishing pre-conditions to enable the suburbs of Bowden and Brompton to development and flourish.

This is further reinforced through the investigations undertaken by Fyfe Pty Ltd, indicating the subject land is well suited to accommodate residential infill and can be economically serviced.

Discussion

While the proposed policy framework is strongly supported and will assist in achieving a greater level of flexibility within the site, some fine tuning of the Council's *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* and proposed policy settings is considered essential.

The requested amendments to the *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* for the Charles Sturt Development Plan of the Draft DPA are attached and discussed below.

We hold the strong view that the restrictive height limit contained in the Council's Concept Plan will not achieve the densities cited by Council nor the anticipated yield of 1500 dwellings.

We have designed numerous small lot and apartment projects throughout the country and evaluated separation distances between apartment buildings. We believe that the current height limits are likely to deliver less than 1200 dwellings from the rezoning area. Parks, street networks, and setbacks between buildings to deliver access to light and privacy separation all contribute to a reduction in yield. An increase in yield to 1500 dwellings improves the relative affordability of fixed infrastructure and is therefore critical to the encouragement of redevelopment of these former industrial sites.

Accordingly, we suggest that building heights should be 2-6 storeys, with majority of the area being 5 storeys, and with 6 storeys along the boundary of Chief Street,

Second Street, and Sixth Street, as the current Urban Core Zone adjacent to the subject site already seeks development of up to 6 and 8 storeys. Development will transition down to lower heights of a 2-storey maximum along sensitive interfaces as sought in the DPA. The enclosed revised *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* reflects our preferred position on building heights.

We have previously provided arguments to Council as to why we expect the current height limits will fail to deliver the yield targeted by Council for the rezoning area. Specifically, overall yields are affected by the separation required between apartments facing each other across a street or courtyard and, accordingly, the density achieved on one isolated site is not typically repeatable on a site by site basis. We append our arguments on this matter for your consideration and, in particular, include two examples of how separation between apartment buildings is achieved in Zetland, Sydney and on a site we are designing at Lowes Creek, Sydney.

Essential to any development is the provision of stormwater infrastructure and open space. The proposed location of stormwater detention and open space, as indicated on Council's Concept Plan, is suboptimal in terms of development flexibility, relationship to the existing pug holes, and in terms of stormwater flow directions. We believe this needs further review in the context of alternative stormwater management mechanisms, whether stormwater detention is required in a circumstance where the proposed development may, in fact, reduce flows over current conditions and in dealing with the ownership complexities of this site.

It is noted that the land use designation on Council's Concept Plan assumes that the two pug holes will be utilised for residential development purposes. We would contend that if the pug holes are to be developed for residential purposes, it is likely that strategies will need to be implemented for each pug hole which address the need for any contamination remediation and any required compaction standards to meet building load requirements. The development and remediation solutions for these pug holes can, and should, be left to further investigation and design, and particularly, whether they should be utilised as reserves.

A further matter that the Council may wish to specifically turn its mind to is in relation to the proposed open space strip along Hawker Street. Built form close to, and addressing, Hawker Street, and possibly including a mix of commercial and residential development, is a more logical arrangement for the local "high street"

(which already has commercial land uses along half of the rezoning area's frontage to that street).

We believe a revised Concept Plan can provide uplift, enable densities to change in response to changing circumstances and foster early infrastructure delivery opportunities. The revised plan will allow efficient use of land and provides increased potential to support local services, businesses and facilities.

Policy Matters

The following comments relate to specific policy provisions within the Development Plan Amendment.

The DPA does not insert the "*Bowden Brompton site*" reference into PDC 31. This should be altered because the incentives in PDC 31 (triggered by the provision of sunlight access and allowing certain concessions on car parking and increases in height) should be extended so that they apply equally to the new rezoned area. The incentives could be readily inserted by simply referring to "*Bowden Urban Village and the Bowden Brompton site*" in PDC 31 for the Urban Core Zone (at page 280 of the Development Plan).

Item 13 relates to public notification in the Procedural Matters section of the Development Plan. Public notification commences at page 286 of the current Urban Core Zone. Given the likelihood that the land will be developed for dwellings in various formats, (but quite probably, group dwellings and/or residential flat buildings as defined), it is important to ensure that the intention to have those dwelling forms listed as Category 1 in fact eventuates. The decision of the Environment Court in the case of *Lewis v Campbelltown* makes it possible that a proposal for two buildings of residential flat buildings will be treated as a Category 2 form of development contrary to the intent of the existing zone. It would be prudent to expressly amend the Table to use phrasing such as "*one or more dwellings*", "*one or more group dwellings*", "*one or more residential flat buildings*" to put the matter beyond doubt.

The terms of the Desired Character Statement in Attachment A (mentioned at item 2 of the Amendment Instructions Table) should incorporate the following amendments:

- In the sixth paragraph we suggest deleting the words "*be of lower height to*" in the first and into the second lines, so that the sentence reads "*Development around the western, northern and eastern periphery of the Bowden Brompton site will complement the streetscape and provide an appropriate transition to lower scale residential areas outside of this zone*". The key urban design object is the transition. Whether this is dealt with by

height or a combination of height, set back, massing, etc, should be left to the contextual design. The policy need only specify the object, not the means to achieve it.

- Paragraph 8 of Attachment A on the bottom of the first page refers to limiting access for vehicles to Chief Street, Hawker Street and Drayton Street. This could be left to the overall design and master planning of the site rather than prescribing this issue in such terms. This paragraph would ideally be deleted and perhaps replaced with a paragraph which says something along the lines of *"Chief Street, Hawker Street and Drayton Street may be upgraded over time to improve pedestrian and cyclist movements as well as on street parking, landscaping, and road safety. Some road widening may be required"*.
- Paragraph 9 (the first paragraph on the second page of attachment A) prescribes the location of open space throughout the zone. The location, size, and orientation of open space will depend on a range of factors yet to be clearly resolved, including the approach to stormwater management, the design, siting, and orientation of buildings and access points, the precise location of roads and pathways, the treatment of site contamination hot spots and pug holes, and the location of ownership boundaries. The way in which all of these matters are addressed will have a bearing on what open space is able to be provided and where. We suggest that this paragraph should express a general intent for open space provision but acknowledge that a range of factors will influence the ultimate distribution of open space.
- Paragraph 11 refers to sensitive land uses being designed to minimise negative impact on existing uses. Given that this is an area in transition and that the transition may occur over a period of 10 to 15 years it is inappropriate to require permanent design solutions for a relatively short-term transition period. The policy would better refer to temporary mitigation measures rather than prescribing that the design and construction of buildings will be influenced by land uses that are very likely to vacate the area within a relatively short time.
- Paragraph 12 ought to be substantially reworded. The last sentence commencing *"Due to these circumstances ... "* should be deleted. The introductory sentences should be replaced with the following *"Development will need to respond appropriately to any site contamination"*. That is a sufficient policy basis for whatever existing site

contamination there may be to be taken into account in the planning and design process. Whether any contaminants are removed, contained, remediated in situ etc will depend on a variety of factors and is subject to the controls under the *Environment Protection Act*. Likewise, the development solution is likely to have an effect on the remediation approach (for example, excavation of contaminants for underground car park areas, retention of some materials beneath sealed surfaces etc). There is no need to specify how the assessment and audit system under that Act will apply.

- Paragraph 13 refers to stormwater run-off. Given that there are a range of solutions to stormwater run-off and that the existing run-off from a largely impermeable locality is likely to be improved by modern development, it is considered unadvisable for the Development Plan to prescribe the stormwater solution. There may be better options open to innovative engineers and designers. These may also depend on the where and how open space is provided. There is no sequencing or staging sensitivity for stormwater management (the land is relatively flat and presently impervious). There are no critical strategic issues to be addressed at the large scale. Instead, this can be readily addressed as each development takes place. This paragraph should be deleted and reworded as follows *"stormwater run-off detention may be managed in several ways. Indicative potential locations for detention basins (if required) are shown on concept plan map ... "*.

Concept Plan Map Charles Sturt 31 should be revised. In particular, we enclose an alternative Concept Plan which identifies the preferred height arrangements across the rezoning area. Significantly, we do not propose to alter the height of buildings at any point along the Chief Street, Hawker Street, Drayton Street, and Gibson Street zone boundary interfaces, thereby achieving all that Council is seeking in terms of transition to adjoining areas, but do propose increasing the internal density to increase the prospect of delivering a viable development outcome.

This plan has deliberately removed open space, stormwater, road and pedestrian locations, and vehicle connections. We believe the plan needs to provide flexibility and that broad policy statements on these matters probably better facilitate a viable outcome for the area.

Conclusion

As indicated, while the proposed Urban Core Zone will assist the policy framework in achieving a greater level of flexibility within the suburbs of Bowden and Brompton and is strongly supported, the requested amendment to *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* and to selected policy provisions will provide appropriate, increased development opportunities in alignment with the aims of the Bowden and Brompton area.

We trust that this information is received as constructive advice. We request to be heard at the public meeting on Monday, the 15th of October 2018.

Thank you for considering this submission.

Note that the attachments form part of this submission,

Yours Sincerely



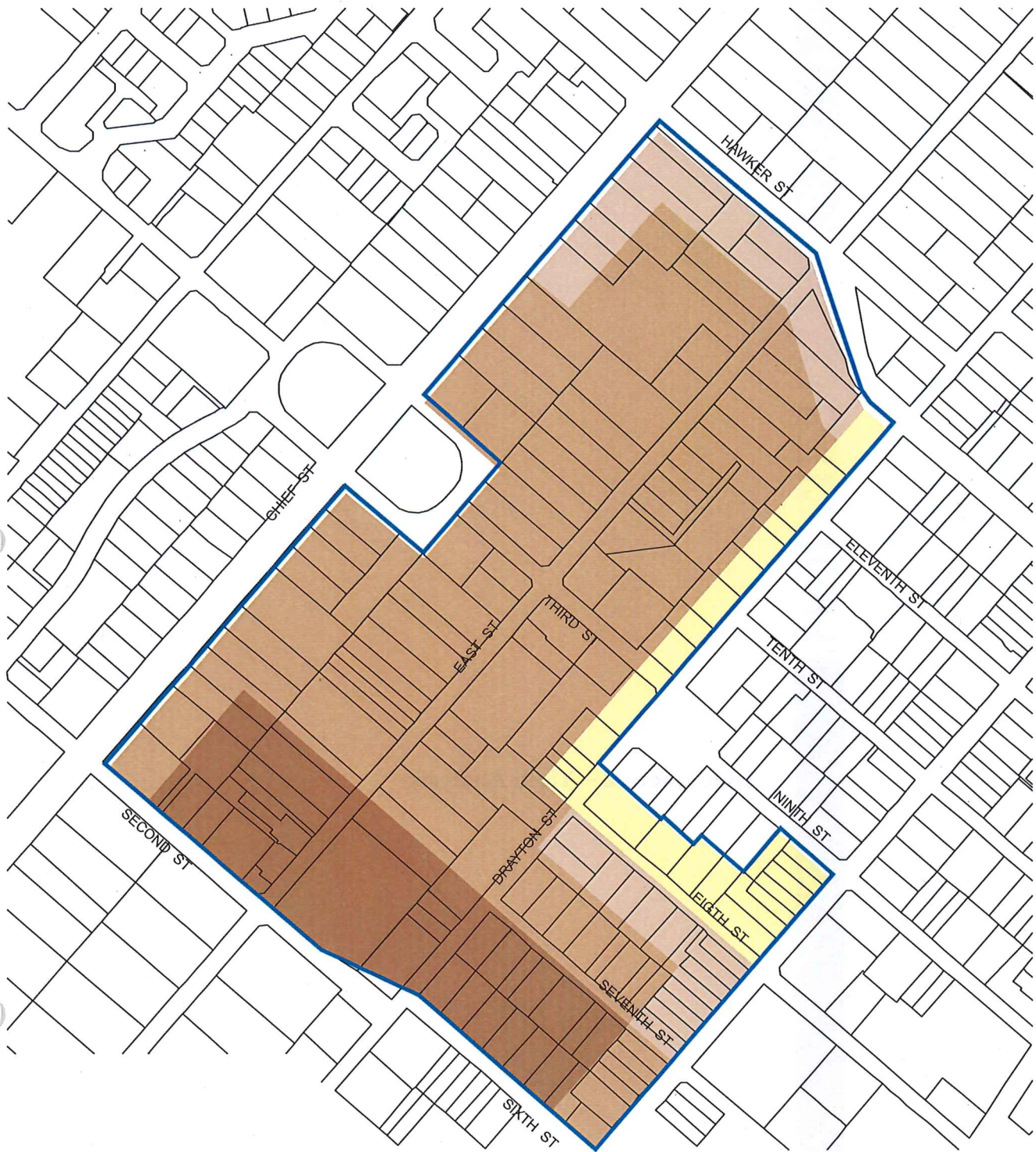
Stephen Holmes

Director

Attachments:

1. Revised *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* plan
2. Yield Analysis

**Attachment 1 - Revised Concept Plan Map ChSt/31 –
Bowden/Brompton Urban Core Zone plan**



- 2 Storey maximum
- 3 Storey maximum
- 5 Storey maximum
- 6 Storey maximum
- Concept boundary



CONCEPT PLAN

Attachment 2 – Yield Analysis

Yield Analysis

Our analysis of yield potential within the rezoning area is summarised as follows:

1. Our yields are based upon at grade car parking as we anticipate that the car parking would be within the building footprint or behind the building similar to the prevailing arrangements at Bowden Village and therefore not visible to the public. We note that the basement car parking is typically more than twice as expensive as at grade parking within a building structure (\$50,000.00/space versus \$20,000.00/space) and that open lot car parking is around \$3,000.00 per space. It would be inappropriate to expect that the Brompton site is required to deliver something more than what is occurring at Bowden Village regardless of the use of an identical policy. We would anticipate that words that sought car parking to be *"screened from public view"* might deliver a suitable outcome.
2. We have prepared our yields based upon precise area calculations and provide these for your scrutiny. Our calculations are as follows:

» Option 1:

■ 13288m ² at 67 dw/ha	89
■ 19575m ² at 100 dw/ha	196
■ 47457m ² at 200 dw/ha	949
■ Total.....	1234 dwellings

» Option 2

■ 13288m ² at 67 dw/ha	89
■ 19575m ² at 100 dw/ha	196
■ 29528m ² at 200 dw/ha	591
■ 17928m ² at 250 dw/ha	448
■ Total.....	1324 dwellings

» Option 3

■ 8990m ² at 67 dw/ha	60
■ 11093m ² at 100 dw/ha	111
■ 42309m ² at 200 dw/ha	846
■ 17928m ² at 250 dw/ha	448
■ Total.....	1465 dwellings

» Option 4

■ 8990m ² at 67 dw/ha	60
■ 9597m ² at 100 dw/ha	96

- 43804m² at 200 dw/ha876
- 17928m² at 250 dw/ha448
- Total..... 1480 dwellings

Applying the same calculations to Council's draft Concept Plan delivers the following outcome. Note that an additional area adjacent to Ethelbert Square is now included in the calculation.

» Council Concept Plan

- 13288m² at 67 dw/ha89
- 25516m² at 100 dw/ha255
- 42300m² at 200 dw/ha846
- Total..... 1190 dwellings

Accordingly, we believe the concept is only likely to deliver around 1190 dwellings.

We strongly believe that the densities applied by us represent a more likely scenario. This is not to suggest that Council's densities are not possible to achieve, however, our real-life experience suggests that access arrangements, setbacks between buildings, cost effective car parking delivery and management of privacy between dwellings will deliver lesser rather than greater density. For example, Lightsview is delivering less than 40 dwellings per gross hectare (or 65 dwellings per net hectare) from a dwelling mix that is now predominantly 2-3 storey small lot housing and 4 storey apartments.

3. We have reviewed two of the four example sites provided by Council for density calculations and make the following comments regarding their relevance to densities likely to be achieved at Brompton:

» 16 Mann Drive, Brompton

- This site is built to the boundary of a park on two sides and enjoys access via a dedicated laneway (the top section of the 'T' shaped laneway). These elements contribute significantly to the achievement of the stated site density of 293 dwellings per hectare.
- The subject building has windows and balconies that directly abut the site's park frontages. This would not be possible from a building code perspective or from a visual outlook/marketability perspective if the adjoining site was another building site. The subject building would either be set back from those frontages or the apartments would be reoriented in another direction to achieve an acceptable outlook. The consequence would be a reduction in apartment yield.
- The rear access lane serving the subject land is a feature that is likely to be required to deliver developable sites in a number of instances. This level of fine-grained design and its consequent land take has not been factored into Council's calculation of possible densities at Brompton Village.
- If we factor in an allowance of 508m² for a 10m wide setback to the north-west façade of the subject building and 213m² for the dedicated site access, the yield from the subject

development reduces from 293 dwellings/hectare to 188 dwellings/hectare. We believe that 188 dwellings/hectare is a far more robust calculation that is likely to more readily apply to the Brompton Village site.

» 35-46 Sixth Street, Bowden

- This set of 6 townhouses relies upon access via an 8m wide laneway and is supported by an adjacent pedestrian accessway. On its own, the site does achieve 97 dwellings/hectare, however, its calculation needs to consider half of the width of the rear laneway for the length of the site and 25% of the adjacent walkway, which provides pedestrian access for a number of development sites. The rear lane and the pedestrian accessway are design elements that are not factored into Council's estimation of the density able to be achieved at Brompton Village. When these elements are included into calculation, the area utilized by the 6 townhouses increases by about 158m² and the density drops to around 78 dwellings/hectare.

With respect to the final two examples, because they are not yet constructed, we do not have access to information that allows us to evaluate their density performance.

However, as a further test of likely densities, we enclose details of a small lot housing/terrace housing/apartment concept we have prepared for a real site at Lowes Creek in Sydney's South West. We have chosen this site because it is of a scale that allows for meaningful calculation of densities, including a mix of 2 storey and 3 storey detached dwellings and 4 storey and 5 storey apartment buildings and it is of a directly comparable size to the Brompton Village rezoning area. The Lowes Creek site is 12.5481 hectares to the midpoint of surrounding roads, compared with an area of 13.8644 hectares at Brompton, also calculated to the midpoint of surrounding roads. The mixed housing option (2-4 storey development) at Lowes Creek delivers a gross density of 64.8 dwellings/hectare.

By omitting the lower density area contained within the site (60 dwellings over 1.961 hectares) the gross density for the remaining area is 71.1 dwellings/hectare. If the 4 storey apartments became 5 storeys, the gross density increases to 74.8 dwellings/hectare and by omitting the lower density area, the gross density increases to 83.0 dwellings/hectare.

By isolating individual dwelling types at Lowes Creek, we can determine the net densities achieved by various housing products to be as follows:

- » 2 storey front loaded small lot dwellings (including internal roads required to access the dwellings) 87 dw/ha
- » 3 storey front and rear loaded terraces (including rear laneways)..... 77 dw/ha
- » 4 storey apartments with screened at grade carparking 139 dw/ha
- » 5 storey apartments with screened at grade car parking 185 dw/ha

These calculations include internal accessways because these spaces are essential for site access and separation of the housing product and are additional to the wider road and park network.

Even if all accessways are excluded from the calculations, the net densities for the 4 storeys and 5 storey apartments would only increase to 176 dwelling/hectare and 234 dwellings per hectare respectively.

Accordingly, we maintain that Council's yield calculation for the site will not be achieved at the restricted heights contained in Council's Concept Plan and, as a consequence, the viability of future development will be severely compromised to the point that redevelopment of the obsolete industrial premises might not take place. The cost of infrastructure delivery needs to be spread across the largest number of dwellings possible in order to ensure the area's redevelopment.

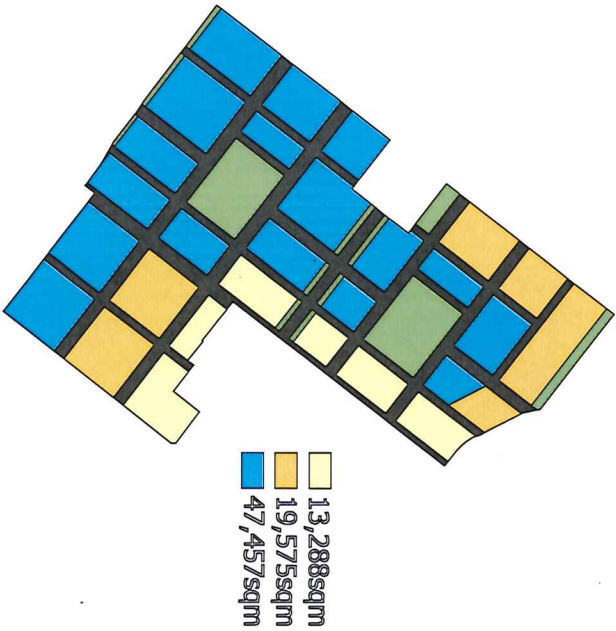
We propose that heights should be 2-6 storeys, with the lower heights along sensitive interfaces, but the majority of the area being 5-6 storeys where it will have no impact on surrounding development.

4. We have reviewed separation distances within a suburb of Sydney (Zetland) which has been substantially redeveloped with apartment buildings over the last 10 years. The significance of this analysis is that the vast majority of apartments buildings are separated by open spaces of around 16m – 26m, demonstrating that even in high density locations, allowance needs to be made for the separation of buildings, which, in turn, impacts upon the yield achievable within a locality. Examples in South Australia include the early stages of Bowden Village, which exhibits separation distances of around 8m – 15m and Garden East in the City of Adelaide, which exhibits separation distances of 8m – 12m.

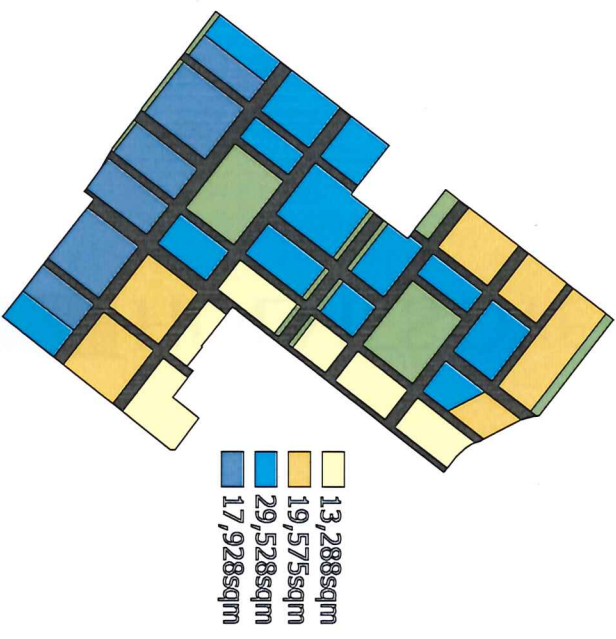
HOLMES DYER

Attachment 1 – Area Calculations

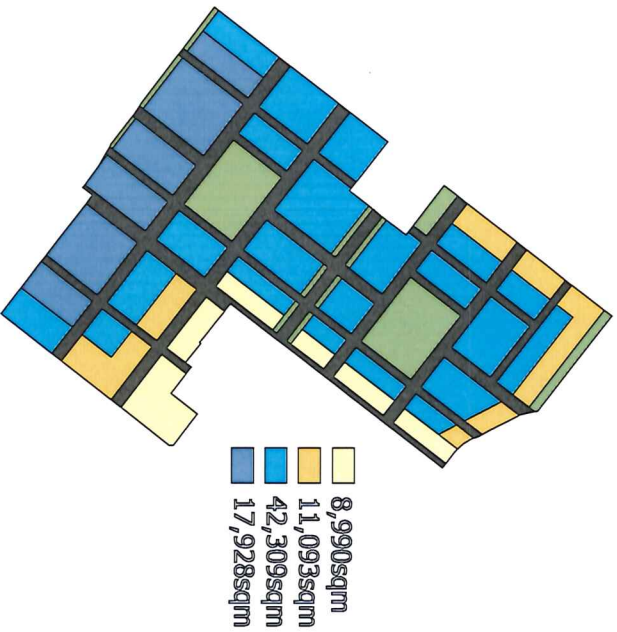
Option 1



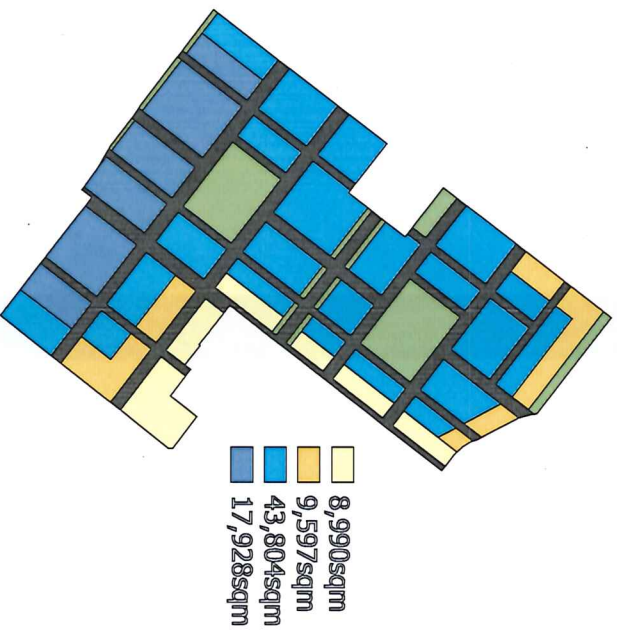
Option 2



Option 3



Option 4



Attachment 2 – Lowes Creek, NSW





YIELD SUMMARY

TRADITIONAL LOTS	92
SMALL LOTS	-
APARTMENTS	729
TOTAL	821

SMALL LOT HOUSING

PRECINCT 1: 4-LEVEL APARTMENT OPTION YIELD ANALYSIS

LOWES CREEK & MARYLAND (PART) PRECINCT



HOLMES DYER

R11 > 16.05.2018 REF: 0354-015



YIELD SUMMARY

TRADITIONAL LOTS	135
SMALL LOTS	-
APARTMENTS	666
TOTAL	801

SMALL LOT HOUSING

PRECINCT 1: 5-LEVEL APARTMENT OPTION YIELD ANALYSIS

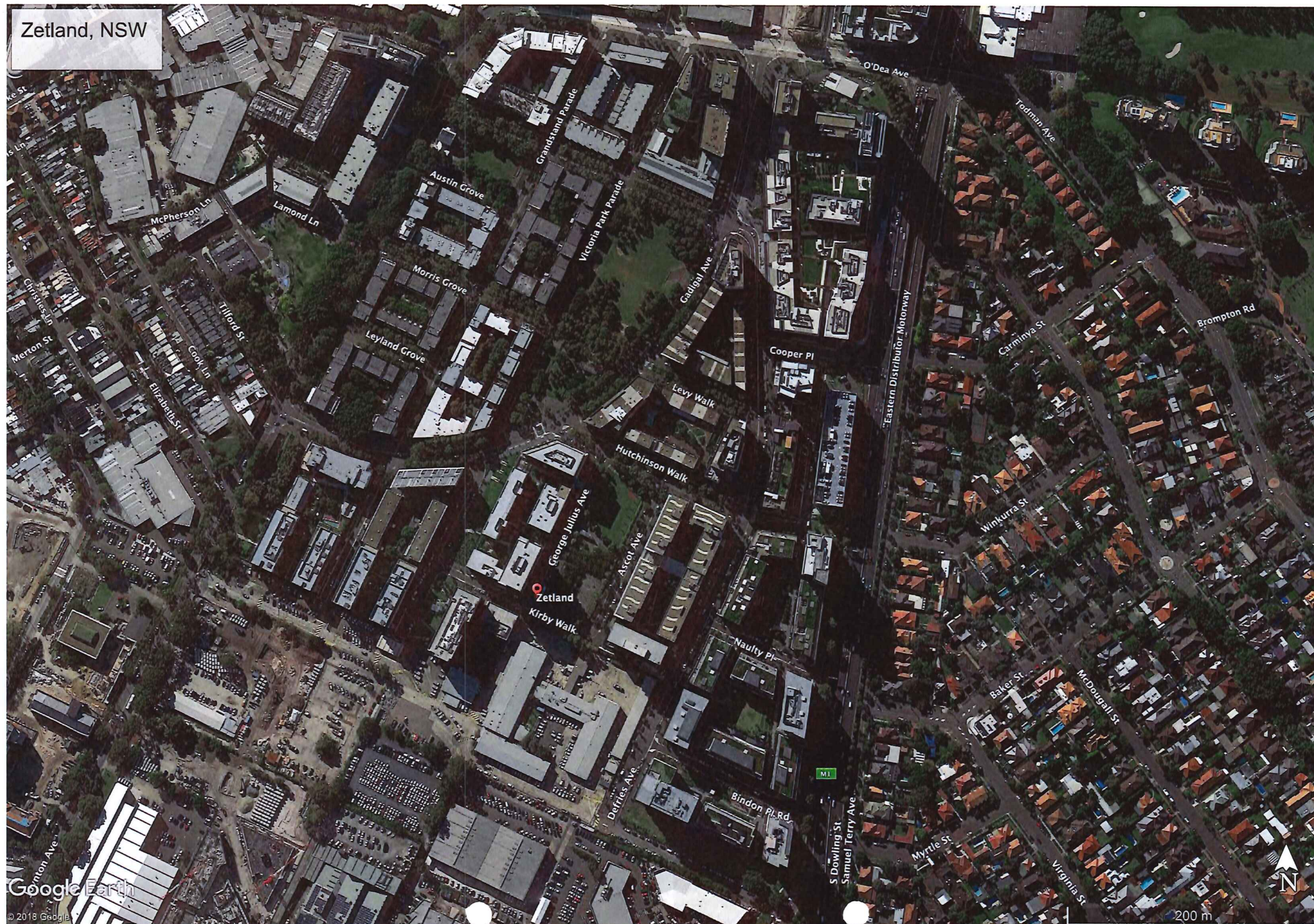
LOWES CREEK & MARYLAND (PART) PRECINCT



R1 > 25.05.2018 REF 0354-015

Attachment 3 – Examples of Building Separation

Zetland, NSW



Bowden Village, SA



200 m



Garden East, SA

200 m

Google Earth

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Submission to the Bowden-Brompton Mixed Use (Residential and Commercial)
Development Plan Amendment (DPA)

I provide the following submission in response to the proposed changes to the DPA and advise that I wish to be heard at the public meeting of Council dated Monday 15 October 2018 at 6pm at the Civic Centre, Woodville Road.

I note that any comments provided by the public will inform changes to the DPA.

My initial response to the proposal to include the Affected Area within the Urban Core Zone-Bowden Brompton was positive as I am in principle in favour of development of the site. It is a welcome move to revert the industrial site to housing.

The Affected Area has the potential to be a focal point for the local area, to spring board off the Bowden development and to provide the local community and visitors to the area with an exemplary living experience. This area binds Bowden and Brompton, development of this area will potentially allow the community to move freely between the two suburbs and beyond.

The people who live and have lived in Bowden and Brompton share a deep passion for the area's history and are therefore keen to see the area developed in a sympathetic manner. It has been and still is an area that attracts a diverse collection of artisans, a feature that should be celebrated and enhanced in any future development.

On consideration however, for a successful development to be achieved, greater assessment and prudent thinking need to be applied. The pursuit of profit should not outweigh the future use and enjoyment of the area by current and future residents and visitors. Further investigation should be applied to the Affected Area.

Following, I provide my specific responses to the Key Changes Proposed in the DPA:

1. Extend the adjacent Urban Core Zone to apply to the subject land.

Response – On further review of the information available to date, I am opposed to the re-zoning of the Affected Area to Urban Core Zone as this will simply allow as many dwellings as could possibly be built, squeezed into the space. The central and far southern part of the area may lend itself to Urban Core Zone however the current proposal does not adequately consider the other areas surrounding the Affected Area. Granted that the Affected Area is located adjacent an Urban Core Zone but it is not a transit corridor and the greater part of the area is more than 800 metres from the tram/train lines and at least a 15 minute walk. The Affected Area is bounded by single storey dwellings and except for the proposed development adjoining Drayton and Eight Streets the current Concept Plan Map does not provide for any transition between the proposed high density housing and existing housing along Chief Street and Hawker Streets other than the retention of existing Plane Trees.

2. Introduce a Desired Character Statement specifically for the subject land.

Response – A Desired Character statement needs to be cognisant of the physical and social history of this whole area and of the adjacent developments in Bowden and the Gasworks site as well as the adjoining residential dwellings. These areas need to be in synergy with each other.

3. Allow medium to high density residential development ranging from 2 to 5 storey's in different locations.

Response – I am opposed to 5 storey development along Chief Street. Current dwellings on Chief and Hawker Streets are predominantly single storey and are set forward toward the street. Development of 5 storey housing opposite from these dwellings should not exceed 2 storeys. Traditional detached dwellings should

be bordered by low-rise dwellings such as townhouses as severe shadowing and streetscape impact of buildings higher than 2 storeys will be a detriment to this area and its future use as a pedestrian zone.

- ◆ *Any development should ensure an effective transition from lower density to higher density and only the area adjacent the rail/tram lines should be considered for a maximum of 5 storeys.*
- ◆ *Existing dwellings in this area are set far forward towards the street (a character of the area) any development opposite, apart from its high limit of 2 storeys should employ setbacks in order to mitigate and be able to disperse street noise, ensure open space and greening.*
- ◆ *Street noise in Chief and Hawker streets is a major concern for residents as the area has a very high reverberation factor. There has been no consideration regarding the effect of a wall of housing along these streets in relation to reverberation of noise and its effect on the health of local residents.*

There should also be a greater choice in housing in the Affected Area rather than just townhouses and high rise. A mixed demographic ensures longevity of the area. It is important to provide housing for families, the elderly and the disadvantaged as well as couples and single people. People cannot have a vested interest in where they live if it has no diversity. This is what makes a community, without this mix the area will eventually lose its lustre.

There is a very real concern that the eventual saturation of the market of apartments and high density housing will render these homes undesirable and that they will be left empty over time if a mix of housing and people is not adopted. The area should be developed in such a way that it encourages long term residence.

An independent study of people living in medium and high density housing in Bowden should be undertaken so that they can share their lived experience of the area to inform the development of the Affected Area.

4. Allow low impact and intensity non-residential development to service the needs of the local area, concentrated along Hawker and Chief Streets.

Response – I am concerned about what this actually means. If we are talking about a butcher, a baker and a small grocery store and a café or two, this is vastly different to several takeaway food outlets, restaurants and pubs. Any inclusion of this sort will further affect noise, parking, lighting, pollution-both air and rubbish, all issues that are already of concern.

Any non-residential development should have a direct connection to the area, its previous use before industry and current adjacent character and use, such as arts and crafts shops, small patisserie, coffee shop, tailor/dressmaker etc.

5. Introduce a Concept Plan to guide future development and public infrastructure within and adjacent to the area (e.g. public open space, stormwater management devices, road improvements).

Response – I believe this should include community consultation as it will affectively change the way that people move throughout the area and will affect their way of living. Residents and visitors would certainly welcome widening of footpaths and Improvements to walking and cycling paths.

Open spaces should be provided as much as possible as they are the cornerstone of a health happy community but the flow of these areas and how they are used or could be used needs to be assessed.

- ◆ *As an example, if development of Chief Street is carried out as proposed with restrictions on vehicle connections and buildings of 5 storeys, it will cut Bowden/Brompton in half. People will live and move on each side of the street but not cross to the other side. The effect of vertical gated housing will be polarising. The higher the dwellings the less likely people will come to the ground. The proposed heights will destroy any street culture and break down community. If the road network is*

to be developed in a similar manner to the "Streets for People" approach within the nearby Bowden Urban Village then this approach should include Chief Street.

- ◆ *Currently traffic is a major issue in the area. The DPA proposes that there will be minimal impact on existing streets from the development but no consultation with residents has taken place to determine this. Local residents experience delays of up to 10 minutes trying to travel out of the local area during peak periods.*
- ◆ *Parking is also a serious issue with residents, visitors experiencing major problems with parking. Hypothetically encouraging walking and cycling is desired but in practice people will still choose to drive their cars and park as close as possible to transport (particularly when they are from outside the local area).*

6. Ensure that the necessary environmental (contamination) investigations accompany development applications for sensitive land uses.

Response – it is my understanding that several areas in this zone would not lend themselves to any viable land use due to their contamination. If remediation is planned this should be done under strict guidelines and conditions with adequate notification and communication with residents in affected areas.

7. Minimise land use conflicts between existing non-residential land uses and future residential development (noting that existing use rights will enable current activities to continue).

Response – it is not evident from the DPA which non-residential land uses (other than the Marble & Cement Group and Detmolds) will continue to operate in the area so it is difficult to comment on conflicts.

It is my experience after living in the area for 28 years that the landholders who have commissioned the changes have demonstrated over that time that they have no interest in retaining any physical, natural or social history of this area for now or the future. Therefore I have a hard time believing that their motivation is anything other than to maximise their profit from the development of the area. It is currently hard to determine who and how measures to ensure the area is developed according to policy and guidelines will be monitored or managed. I am concerned that Council will not be able to manage the development on behalf of the community and that once the area is rezoned there will not be enough measures in place to ensure adherence. Already we have seen that the development in West Street and the surrounding area is not in keeping with the original character of Brompton. It is evident (even from things such as a lack of footpaths for pedestrians), that not much consideration is given to the people who use the area on a daily basis and who have to live in or next to what is created for them.

I would like to conclude my submission by noting that the time between the receipt of the notice of the planned changes to the DPA and the submission date do not allow enough time for busy families and working households to engage with the broader community and discuss the changes. As we are individually and collectively interested and ultimately affected by the changes I feel that there has not been enough time to read the necessary documents and determine their relationship to each other and to provide a reasonably informed response by 28 September 2018. All the community needs to have time to discuss such changes and what the implications are. The community needs to have the opportunity to come together and work through the issues that may affect them. I don't think enough people have been engaged and believe most people would be completely unaware of what is about to take place in their neighbourhood.

- **Extend the adjacent Urban Core Zone to apply to the land.**

Disagree to extending the adjacent Urban Core Zone (Bowden TOD – Bowdent Urban Village) to apply to this land. It appears the current Bowden – Brompton Mix Use DPA does not fulfil a fundamental criteria for it to be an Urban Core Zone.

It seems the urban core zone cannot apply to the whole site and particularly along Chief Street as within the State Government's key plan policies, point 3. transit corridors states;

“Concentrate new growth within metropolitan Adelaide in transit corridors, transit oriented developments and activity centres so that the urban character of the majority of neighbourhood remains largely unchanged.” South Australian Planning Policy Library, Technical Information Sheet 12 – Urban Core Zone, Release: September 2011

https://www.sa.gov.au/data/assets/pdf_file/0014/6440/Tech_info_sheet_12_Sep_11.pdf

The DPA states "A higher density, mixed-use, vertically integrated core within 800 metres of mass transit corridors with densities decreasing as a transition to adjacent neighbourhood storeys".

With regards to point 3, transit corridors, Chief Street, is not a mass transit corridor. It is a collector/distributor road. There is no public transport on Chief Street and the distance between Bowden Station and the corner of Chief Street and Second Street is close to 800meters.

The DPA should be broken up into various zones.

Any land past 800 meters from the Bowden Station cannot be included as part of an urban core zone as it exceeds the 800 meter distance from the central transit stop. This 800 meter principle is the foundation from which Transit Orientated Developments are desired and swapping St. Clair Reserve for housing development to become part of a TOD is an example of this 800-meter walking distance principle.

Within 'Desired density and urban form', the State Government Policy explains in point 3; "Transition Area: Envisages development of 3 storeys which is predominantly residential. This area applies between the Core Area and approximately 800 metres walking distance from the centre, place or public transit stop."

The land in this DPA should be a buffer between the Bowden TOD and nearby residential zones or lower intensity zones and while 5 storeys is suggested in the DPA, that this land is 800 meters from the public transit stop and Bowden urban centre, within the transition area of an urban core zone, 5 storeys does not comply within the state government policy as even within the transition zone, the number of storeys is 3 storeys.

Furthermore, Ethelbert Square is 1.1km from the Bowden Station.

The DPA states "A higher density, mixed-use, vertically integrated core within 800 metres of mass transit corridors with densities decreasing as a transition to adjacent neighbourhood storeys."

Within an urban core zone is the allowance of building storeys within 400 meters of the urban centre to 10 storeys. I cannot see within this DPA an indication of an urban centre, however a

reliance on the Bowden Urban Centre and Bowden Station as the core centre and it is within risk to allow this zone without indications of investment into planning and social commitment and particularly with public sentiment towards 'building future slums', 'future ghettos'. To prevent this involves enormous investment as a 70 year plan that aligns with the life of quality houses built before they are demolished for newer models.

For Renewal SA to develop the Urban Core Centre that provides its allowance to 10 storey heights, it had made enormous investments in risk assessment, and since the inception of Bowden TOD to the public around the year (2007), there was enormous investment in resources allocated to community engagement that contributed to cultural and heritage mapping surveys, marketing brand development and this consultation extended to working with representative from the Kaurna Nation Cultural Heritage Association in assessing other heritage surveys to the recommendation of further Kaurna Heritage and other heritage surveys for the Brompton Gasworks State Heritage Place.

The DPA cannot be an extension of the Bowden TOD Core zone as the practicalities involved in developing a core zone seem beyond the capacity of a private consortium and furthermore, that this DPA is a private initiative it will not be controlled by government, then the safety-nets for accountability and transparency to the public that governments are held to account by the public are not anchored.

Bowden TOD is the model development and within this core zone foundation came many resources, studies, surveys and many years of consultation with the public beginning around 2007 before the Master Plan development 2011. One where commitment to consultation and engagement is demonstrative by the 6 year tenure of the Bowden Reference Group and now, with the development of the Bowden Heritage Precinct, Mr. Wingard has explained the scope of consultation will extend to a much wider public. Renewal SA is planning to engage more broadly with the local community on the Heritage precinct adjacent to the DPA. This engagement process for the Bowden Heritage Precinct is intended to replicate the initial stages of the Bowden TOD master plan development and to secure the integrity of this urban village, further investment into risk prevention. It's from this basis that I cannot see a private consortium prepared to invest the years for initial consultation to get the planning correct and in this way think the urban core zone with its allowance for future 10 storey buildings is a risk.

To extend an urban core zone without public transport infrastructure will lead to a reliance on cars and then when considering the main access points being Third Street Bowden from Park Terrace and from Chief Street Brompton into Second Street to then Bowden then consider how Third Street Bowden will be used by cars to gain access to the adjacent DPA zone. Third Street, Bowden, is right inside the urban core of the Bowden Transit Orientated Development and then, for it to become the access road from Park Terrace for residents in the DPA zone will defy the whole Bowden TOD project.

This is demonstrative by "As a result of the closure on East Street and the limited capacity at Chief Street/Port Road, there will be a significant increase in pressure on the intersection of Sixth

Street/Park Terrace. The volumes distributed to the Sixth Street/Park Terrace intersection as a result of the redevelopment will be low. Therefore, it is considered that upgrade of this intersection is not directly required as a result of the potential redevelopment, but, nevertheless will ultimately be required (by 2031) to accommodate all of the developments discussed as well as general growth in volumes on the road network.” Final Investigation Report – Bowden-Brompton DPA Investigations pg. 56

- **Introduce a Desired Character Statement.**

To include Accessibility for mobility impaired in- “Public realm responses that create sufficient space to accommodate foot / cycle paths including off-road (for example, a network of greenways incorporating local indigenous trees), as well as on-road cycling routes to destinations;”

To include accessibility to shops for daily goods in - “Ordering the structure of community and providing opportunities for people at different stages of life to be physically active by ensuring neighbourhoods are within a walkable distance of community parks, town squares and piazzas;”

Safety and stability principle – a safe neighbourhood with connection to people and the public realm and a stable neighbourhood with residents living long-term in the area.

Equity - To include Public Housing as separate to ‘ 15% Affordable Housing’. Public Housing to maintain equity for people who are most disadvantaged and from disadvantage are vulnerable to risks. (see upward and downward mobility - Smart cities wouldn’t let housing costs drive the worse-off into deeper disadvantage, <https://theconversation.com/smart-cities-wouldnt-let-housing-costs-drive-the-worse-off-into-deeper-disadvantage-61213>) and (Why 100 years without slum housing in Australia is coming to an end <https://theconversation.com/why-100-years-without-slum-housing-in-australia-is-coming-to-an-end-64153>).

Public Housing for families who have experienced domestic violence and at risk or have experienced homelessness.

To allocate housing for seniors who are also at risk of homelessness as “The population is projected to reach 38 million in the next 35 years. The proportion of older people will be higher, with a lower proportion in the paid workforce. This means we need at least six million new housing units in the next three decades. Some people need affordable housing responses that are smarter than the market alone can supply.” <https://theconversation.com/a-national-affordable-housing-strategy-necessary-attainable-and-maybe-on-its-way-49943>

Shop Fronts as association spaces - Recycling and Repair - Non retail space allocated as association space for Bike Kitchens and Men’s Sheds so residents can go to these workshops, have their items repaired and also participate.

Non retail space allocated to maintaining the crafts with arts studios and workshops.

Heritage Character – have buildings built within heritage character like the older parts of the suburb to buffer against economic downturns. See research in preservation economics – economics of heritage.

Generous setbacks from the streets – to calm the edges and overpowering sense from large buildings and narrow streets add greening within the principles of the garden city model.

Greening to calm the edges in developments - to balance out these harsh angular edges, generous setbacks from the streets to apply and find ways in which greenery in streets connects us to traveling instead of roads being the focal points that currently cut connection in streets and cut blending between private and public integration for connection. If we incorporate street space for greenery as the streams to follow to the parks and communal spaces instead of roads being the focus then the aesthetics are much healthier for people. Also as mentioned earlier would be a desire to incorporate shop fronts as association spaces to have further integration.

Tree Canopy streets - “South Australia’s metropolitan areas are marked by relatively low levels of tree canopy when compared to other Australian capitals. Of the assessed LGAs, tree canopy ranges from 44% in the Adelaide Hills to 12% in Port Adelaide Enfield. However, South Australia does share one thing in common with the rest of the country. The vast majority of South Australia’s population live in urban areas. The 19 LGAs assessed in South Australia are home to almost three quarters of the state’s population (73%). None of the LGAs surveyed have tree canopy of less than 10%, however 11 of the 19 fall within the 10-20% range. And it is important to note that the two LGAs with the highest proportions of tree canopy—Adelaide Hills (44%) and Mitcham (42%)—feature conservation areas within their boundaries. Map on page 20. Charles Sturt, West Torrens, Port Adelaide Enfield, Glenelg, Marion, Onkaparinga, to name a few between (10-20% range) and yet the first map on page 20 shows these council districts in red fall below 9.9% canopy cover.

http://2020vision.com.au/.../where_are_all_the_trees.pdf

Enact the Garden Cities principles:

“Strong vision, leadership and community engagement

Land value capture for the benefit of the community

Community ownership of land and long-term stewardship of assets

Mixed-tenure homes and housing types that are affordable for ordinary people

Beautifully and imaginatively designed homes with gardens in healthy communities

A strong local jobs offer in the Garden City itself and within easy commuting distance

Opportunities for residents to grow their own food, including allotments

Generous green space, including: surrounding belt of countryside to prevent unplanned sprawl; well connected and biodiversity-rich public parks; high quality gardens; tree-lined streets; and open spaces.

Strong cultural, recreational and shopping facilities in walkable neighbourhoods

Integrated and accessible transport systems”

To include some sense of control and ownership in the landscaping of open spaces, and planting in laneways and local road verges for residents.

The environment that people live in has a big impact on perception of wellbeing, and also on health outcomes. These health benefits need to be taken into account when conducting urban planning (see To build a garden city, you have to plant to plant <https://www.treehugger.com/urban-design/build-garden-city-you-have-plan-plant.html>)

Garden Cities principles remain relevant today. In Australia, it's estimated that 45 per cent of people will experience a mental health condition in their lifetime. <https://www.beyondblue.org.au/the-facts> Mental health effects children (0-12), young people 12-25), Men, Women, older people, pregnancy and early parenthood, Aboriginal and Torres Strait islander people, LGBTI people, and multicultural people. That 2601 people have been factored into this DPA development, then factor in 45 per cent of people who will experience a mental health condition in their lifetime, within the mix use development, 1170.45 people will experience in their lifetime a mental health condition.

Statistics on who uses mental health services show only one third of people (34.9%) with a mental health disorder used health services for their mental health problem and two thirds of people with a mental health disorder did not report using services for their mental health disorder.

https://mhaustralia.org/.../statistics_on_mental_health.pdf

If this trend in statistics continue then factor in 761.51 people will be living with a mental health condition untreated.

Research suggests environment from which we live has a significant effect on ameliorating the effects of these conditions. On average 10 more trees in a city block improved how someone rated their health. Parts of our brain we use change when we connect with nature. In lab-based studies, MRI scanning shows that when viewing urban scenes, blood flow to the amygdala – the “fight-or-flight” part of the brain – increases. ‘Our brains view cities as hostile environments. Natural scenes, by contrast, light up the anterior cingulate and the insula, where empathy and altruism happen. In areas with more trees, people get out more, they know their neighbours more, they have less anxiety and depression. Being less stressed, gives more energy to be active.’

<https://www.theguardian.com/cities/2016/oct/12/importance-urban-forests-money-grow-trees>

Research suggests people are less violent when they live near trees. One of the cited examples is a study that looked at women in a Chicago housing estate. Those who lived near the trees reported less mental fatigue and less violent tendencies than those in the barren areas of the same estate https://is.muni.cz/el/1423/podzim2011/HEN597/um/Readings_Env_Psy/Kuo_F.E._Sullivan_W.C._2001.pdf).

Trees can cool cities by between 2C and 8C. When planted near buildings, trees can cut air conditioning use by 30%, and, according to the UN Urban Forestry office, reduce heating energy use by a further 20-50%.

- **Allow medium to high density residential development ranging from 2 to 5 storeys in different locations.**

Disagree to high density residential development as there is enough existing density in the area surrounding this zone.

Within 'Desired density and urban form', the State Government Policy explains in point 3; "Transition Area: Envisages development of 3 storeys which is predominantly residential. This area applies between the Core Area and approximately 800 metres walking distance from the centre, place or public transit stop." South Australian Planning Policy Library, Technical Information Sheet 12 – Urban Core Zone, Release: September 2011

The land in this DPA should be a buffer between the Bowden TOD and nearby residential zones or lower intensity zones and while 5 storeys is suggested in the DPA, that this land is 800 meters from the public transit stop and Bowden urban centre, within the transition area of an urban core zone, the 5 storeys does not comply within the state government policy as even within the transition zone, the number of storeys is 3 storeys.

Furthermore, Ethelbert Square is 1.1km from the Bowden Station.

Any land past 800 meters from the Bowden Station cannot be included as part of an urban core zone as it exceeds the 800 meter distance from the central transit stop. This 800 meter principle is the foundation from which Transit Orientated Developments are desired and swapping St. Clair Reserve for housing development to become part of a TOD is an example of this 800-meter walking distance principle.

To further add, within the the Bowden TOD Masterplan, Concept Plan Map ChSt/23, http://www.dac.sa.gov.au/data/assets/pdf_file/0006/325743/Item_2.2.1_attachments_opt.pdf, find included next to the Bowden Heritage Precinct the Transition Zone near Chief street to Second Street with storeys scaling down from the Urban Core Centre. At the Community Heritage Forum held at the Bowden Brompton Community Centre on 9 September 2018, the representative from Renewal SA made clear to the public that these building are intended to be no higher than 5 storeys. And yet, within the state policy, transition areas should not exceed 3 storeys.

- **Allow low impact and low intensity non-residential development along Hawker and Chief Streets.**

Agree to low impact and low intensity non residential development along Hawker Street as non residential development could complement what may be an existing business community district. Residents have desire for the heights not to exceed the height that already exists from the Detmold building on the corner of Chief Street. A footpath and nature verge set back along that curved part of Hawker Street aligning with the restaurant business (East St/ Chief St) would make that curved part of Hawker Street safer as there have been near misses as reported in the Bowden Brompton Ridleyton LATM Report (2009). A nature set back would further complement the greening surrounding Welcome Centre (formerly Anglican Church of the Good Shepherd Missing) across the road on Hawker Street and be a continuation of War Memorial Drive.

To keep in mind, comment of the vacant business on Hawker Street (former restaurant) and the concern of empty retail space. It would be desirable for council to develop a business sustainability plan. Empty retail space is a serious matter which currently O'Connell Street North Adelaide is experiencing and O'Connell Street North Adelaide is a major retail location. If O'Connell Street is having difficulties in occupying retail space, then what provisions and safeguards are there for a minor location like Hawker Street?

Deli/ cafe style shops that complement the existing non-residential infrastructure would complement this section of Hawker Street where with the existing shop fronts and heritage church building and with the paved road it could resemble a diminutive of King William Road Hyde Park, or Duthy Street Malvern/Unley and by this would be a local/surrounds draw card. The products sold need to be affordable to enable people to spend. There will need to be caps on rent and rates to incentivize caps on rent to enable business to develop the attraction. By this, a business sustainability plan should be encouraged because as it appears now, Port Road is a major business non-residential district, and the Bowden TOD has its own retail core through Plant 4. There's intention of further retail on Third Street near the Heritage Precinct, and a Gibson Street Main Street Plan and then suggestion of non-residential development on Chief Street. These precincts will be competing for leasees and clientel and consequently there could be an over supply. If Plant 4 Bowden is a place for business start ups (tester), then a streamline for business startups to shop fronts should be developed, else there will be empty commercial space.

Chief Street should not resemble medium or high density as Chief Street is the boulevard and by this the aesthetics of building infrastructure on this road will determine the quality and perceived demographics of the development. These buildings will determine if the area is a 'future slum' or 'future ghetto' and to prevent this, the buildings should maintain the theme of Chief Street north of Hawker Street. Homes should be of a good quality size, set back from the street with green gardens, low fences where they serve as the set back to medium density inside the zone. Chief Street houses (north of Hawker Street) have recently sold within the range of \$718,750 - \$1,099,999. These are Brompton's Mansions. If there is group housing / apartment/ living, then the presentation of the building residence should resemble a facade of one homestead to maintain Brompton's Chief Street mansions theme and as intended for this district in 1933, the tennis courts are out back in Ethelbert Square (public property) with children's playground and ornamental trees as was intended for improving Ethelbert Square (see Felling own Firewood- Workless busy at Brompton PARK SCHEME. <https://trove.nla.gov.au/newspaper/article/128430538/11043443> and Improving Ethelbert Square <https://trove.nla.gov.au/newspaper/article/46988649>).

Chief Street, with its plain tree boulevard and state heritage buildings, is the Victoria Avenue Unley Park exemplar of the neighbourhood that should be developed in this way. When currently a prime location like O'Connell Street is not able to occupy its retail/non-residential spaces, there is a risk to the development here and surrounding neighbourhoods if there is investment of Chief Street as non-residential. With immediate concern of existing of empty commercial space on Hawker Street, then this is a current problem where the solutions seem quite remote, that then to enact more of the risk

does not add up. If non-residential development, then possibly business frontages that develop models on fashion or brand outlet shopping could prevent empty shop fronts and attract people. The fashion and brand outlet shops are major tourist attractions to Melbourne suburbs, often concentrated in single suburban streets and with these attractions are heritage character shop fronts that attract people to want to walk the streets and shop.

- **Introduce a Concept Plan to guide future development and public infrastructure (eg public open space, stormwater management devices, road improvements).**

Address Public Transport gaps through the provision of a bus connect as the City of Adelaide has for North Adelaide. These overservable public transport gaps include;

1. a north-south connector on South Road to Henley Beach Road to then access the main bus route south to Flinders Medical Centre or Adelaide Airport.
2. a north-south connector on East Avenue Beverly that connects to Holbrooks Road so students can attend Underdale High School and catch the bus on Port Road.
3. a north south connector on Chief Street that then becomes an East-West connector to South Road. Currently there is no bus service that enables commuters to travel directly on Torrens Road across South Road. Whilst the City to Arndale Express travels on Torrens Road, it does not stop to enable people to board the bus. The public transport routes on Torrens Road divert right, to Churchill Road, Ovingham, and right, to Harrison Road Renown Park.

A circle line could run on Chief Street, left on Torrens Road to left on South Road .. to then wherever there are further access gaps. Or alternatively in conjunction with Port Adelaide Enfield Council and West Torrens Council, there could be a direct north-south connector on South Road to then the main public transport point (Henley Beach Road or Richmond Road) to access the main bus services to Flinders Medical Centre or Adelaide Airport.

There could be a number of circle lines.

Council to conduct a public transport access assessment and map out to find where there are access gaps.

There has been continual propositions of a tram line to run on Chief Street and this does not seem to make sense. Where's it intended to go and where is it intended to come from?

When a tram line was initially conceived in 1907, this related to industry-based needs for these areas. The favoured route was 'a line through Southwark over a bridge to be built across the Torrens to connect with Manton-street, near the Victoria Tannery, and thence up to Lindsay Circus Oval, with a turn into Milner-street, up the Port-road from the Town Hall Buildings to Chief-street, and down to Ethelbert-square, with a dead end for the present. It was thought that the tram could ultimately be continued down Chief-street to the Torrens-road, and thence to North Adelaide.'

In present times the continual propping of a tram on Chief Street seems to have no functional utility and would be costly, however, connector buses are malleable in their routes, cost efficient and in a shorter time frame would be able to get to service on the ground.

Agree - Additional 'local road' connections be provided internally between Chief Street, East Street and Drayton Street (oriented north-west to south-east); Additional 'local roads' or 'laneways' be established. These local roads and laneways adjoining the housing should have connection to the proposed open space to enable children to play unsupervised and with neighbours collectively aware and the additional local roads should have low intensity traffic and serve as walkways to enable better pedestrian and cycle traffic. CIRQA\Projects\17148 Bowden-Brompton Transport Investigations DPA 04JUL18, Page 19 of 43

Laneways and local roads around these proposed open spaces should have low intensity traffic to enable strong connection to the open space with examples, Carrondown Walk Playground, Parfitt Square and Emu Park and preferably combine housing frontage connection like on Parfitt Square and Francis Ridley Circuit and the walkways like Trembath Street to Emu Park and Carrondown Walk to the proposed open space to enable a safe community space for children.

Local roads and lanes serve as spacial buffers to state heritage buildings, for instance, a lane behind the Former Way Memorial Bible Christian Church at the corner of Sixth Street and Drayton Street would enable better view of the back of this building and the sandstone backwall of the building would contribute an aesthetic value to the the local lane.

With regards to Chief Street/Port Road intersection, "the opportunity to provide a second left turn lane from Chief Street to Port Road should also be further explored," CIRQA pg41 of43, assumed then, Chief Street would need to be widened or realigned to enable two left lanes. Further heritage surveys need to be taken into consideration which this report has not addressed. The former St. Joseph's school/convent/chapel on the western corner of Chief Street and Port Road is one of the first sites built commissioned by the Sisters of Saint Joseph of the Sacred Heart from which the Order was founded by Mary Mackillop and Reverend Julian E. Tenison Woods.

Additional Conservation zones, heritage conservation zones could be included where there are state heritage and local heritage sites so that future residences are built in-character complementing these themes. Observable places include;

Along Drayton street to coordinate housing and street scape with State heritage building Way Memorial Bible Christian Church with existing workers cottages commencing at the corner of Eighth Street/Drayton Street.

Along Drayton Street to coordinate the State heritage building Way Memorial Bible Christian Church with the state heritage buildings on the corner of Drayton and Gibson Street.

Regarding the City of Charles Sturt Transport Plan 2016–2031- The target for reducing private vehicle usage seems an insufficient target. The target to reduce private vehicle usage by 2031 would be better set at 30% not 15% (from 85% to 55%) pg 5 of 43 (CIRQA Report). Within the framework of this Current DPA, private car usage can reduce to 30% through greater emphasis on walking, cycling, existing public transport, introducing a connector bus and establishing affordable retail for daily purposes.

A small scale supermarket with goods variety and prices within the competitive market would assist in enabling residents to shop close and with less reliance on leaving the area for shopping for food goods. This seems to be occurring now with residents shopping out of the suburb and using cars to travel to North Adelaide Food Land, Welland Plaza Coles, Sefton Park and Ridleyton Food Land for variety in goods and competing prices.

- **Ensure that the necessary environmental (contamination) investigations accompany development applications for sensitive land uses.**

Archaeologists may be necessary to gain a better understanding of the initial settlement from colonial settlement as before industry expansion, in this section of Bowden-Brompton was residential. With regards to Bowden and Brompton being the first towns developed outside of the city and with housing demolished for industry expansion, it is likely there are archaeological artefacts in the ground that will depict a time of an era. These artefacts can be used for museum collections. The City of Charles Sturt may hold the collection to commission out internationally to museums as there is a market demonstrative by the Museums Victoria Collections - Little Lon collection comprising of 300,000 artefacts <https://collections.museumvictoria.com.au/articles/31>

- **Minimise land use conflicts between existing and future development (noting that existing use rights will enable current activities to continue).**

Future zone protections – There has been much development in Brompton over the past 18 years where on the most part, it has been appreciated by the transformation visible from industrial, fenced off pugholes to greening and homes. Whilst it's appreciated, there seems also a turn of events where existing streets with old houses are now the focus by investors to purchase and demolish these old homes are for the land grab to then build multiple homes. The effects on residents from remediation and construction to now demolition to further construction are not good on wellbeing and to experience all that was needed to now residents becoming part of a further precarious state by not knowing what's going to happen to the home next to them, or how will the construction effect their living wellbeing, this needs to stop to enable for once residents in Brompton to be able to live in peace. This does not happen in Croydon which is a historical conservation zone while in Brompton with its historical conservation zones, it is happening. In given the small land sizes in Brompton this continual land grab leading to the demolition of history and homes of long term people that are part of Brompton's heritage is a social discecration. Furthermore that it is left to the individual within a historical conservation zone to monitor what is built and know the policies, laws and assert to new owners is an exploit of council. To avoid the encroachment of this DPA on

surrounding areas that will lead to homes being demolished and a state of uncertainty for homeowners living , further zone protections and responsible governance enacted by government to these protections.

Displacement Free Zone – this zone is allocated to public housing on Chief Street and other locations controlled by Renewal SA to prevent targeted exploitation from gentrification. A Displacement Free Zone enables stability for people in public housing to live longterm and experience the welfare benefits from housing stability in the area. Such long term stability will also benefit their children and future generations. Within gentrification processes at Westwood and Woodville TOD has been the displacement and relocation of people in public housing. To displace disadvantaged people isn't a value system that aligns with the heritage of Bowden-Brompton and the Bowden-Brompton community of Hindmarsh Town historically did oppose the displacement and exploitation of disadvantaged people.

Submission from Katriona Kinsella [REDACTED]

Re: Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (Privately Funded)

Fundamentally, I am in agreement with the rezoning of the area outlined in the draft Bowden - Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (Privately Funded), herein referred to as the draft Bowden – Brompton DPA, to see a change of the zoning of this land to mixed use residential with medium to high density housing where appropriate.

I ask however that the comments and recommendations in this submission be considered by the Council and the DPA in question updated where/if applicable.

My sense from listening to a number of community members about the DPA in question is that there are a number of concerns regarding the controls that will be in place to manage this development once rezoning is approved. Although I may draw on points raised in community thus far, I stress the views presented in this submission are my own personal views as a resident at the point in time of writing this submission.

My submission speaks to my specific questions and asks for your consideration of points raised. Any comments outside the scope of the immediate DPA are asked to be taken on notice for future consultation or design regarding this site. I also request to be heard at the Public Meeting scheduled for 15 October 2018.

Specific feedback re the draft Bowden – Brompton DPA is presented below under topic headings.

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

Comments:

- The concept plan is inconsistently referenced in the document. It is stated only twice as being a 'draft' concept plan and all the remaining references refer simply to the concept plan. It is through the concept plan that a clear picture emerges about the development envisioned to take place in the outlined area. It is my understanding that the concept plan in the draft Bowden - Brompton DPA will become an approved concept plan once the overall DPA is approved. It is important that this is crystal clear to community as there may be limited scope to alter the concept plan once the DPA is approved.
- Although the logic may exist, it is not clear in the DPA how the decision re a 5 storey maximum alongside Sixth Street is considered relative to the expected development on the opposing street side which according to the approved Bowden Urban Village and Environs DPA 2012, herein referred to as the BUV DPA, is between 3-8 storeys (refer to Attachment 1 below). Should the re-zoning go ahead, how does the DPA and current development guidelines allow for complementary building heights to be managed in relation to the BUV site? Is the Council satisfied that community commenting at this stage of the consultation is sufficiently informed of the relationship between these two sites?

Recommendation:

- Further consultation with community re the logic behind the concept plan take place before the DPA is finalised.
- Given the references to the adjoining Urban Core Zone, it would be prudent to present (or at least refer to) in the draft Bowden – Brompton DPA the current concept plan for the adjoining

BUV area so there is a clear spatial understanding of how these two sites/concept plans will align with each other, including decisions on proposed storey heights.

Open Space

Note the draft Bowden-Brompton DPA Investigations Report stated the following in regards to open space (p.84):

Policy Implications for the Study Area

The Study Area is expected to result in some 2600 people. Using the findings of the Best Practice Open Space in Higher Density Developments, an open space provision of 5 hectares could be expected, equating to some 44% of the Study Area. This level of provision is not supported by the current Open Space Contribution Scheme, however it supports a recommendation that the full 12.5% provision of public open space (as estimated from a calculation of the total developable area) be provided, which equates to approximately 1.22 hectares of land. The proposed allocation and location of open space in the Concept Plan supports both the total provision of open space, as well as the distribution of space within the Study Area that combines the provision of open space with the stormwater detention requirements.

Note the draft Bowden-Brompton DPA stated the following in regards to open space (p.13):

Best Practice Open Space in Higher Density Developments Project (2011)

While the statutory context for providing public open space during the land division approval process has not changed, the report makes the important point that "... the South Australian legislative figure of 'up to 12.5%' of a land division may be adequate for lower density areas, but it results in only around one hectare of open space allocated for every 1,000 people in a high density urban development." And that "(t)his is Bowden – Brompton Mixed Use (Residential and Commercial) DPA Charles Sturt Council likely to be inadequate, unless there is a good provision of open space nearby that will directly service the development area."

Arguably, the subject land is in close proximity to Ethelbert Square (around 4,600m²), Ninth Street Reserve (900m²) and Emu Park (3,500m²), will be in relatively close proximity to existing and proposed public open space developed as part of the adjacent Renewal SA / Bowden development, and is in relatively close proximity to the Park Lands. Nevertheless, this study has confirmed the need to carefully consider the desired location, amount and function of public open space in relation to what will be a higher density residential environment.

Comment:

- This is potentially a rare opportunity to significantly improve access to open space in this precinct (also known as precinct A in the City of Charles Sturt Open Space Strategy 2025), including the opportunity to create a 'destination' playground and/or community space. Inclusion of such a space in this development may not only increase the open space provision, closer to the targets referenced above, it also has the potential to support small businesses that establish themselves in the new development due to the relationship between foot traffic and sales.
- A 'destination' open space area in this precinct may also help to bridge the potential 'Chief Street and Hawker Street divide' encouraging residents from the existing neighborhoods to engage with the facilities and the community in the new development. Given the likelihood that landowners will need to contribute a proportion of funds to community space in this new development, this opportunity will pass if not taken up at this point.

Recommendation:

- Consider a number of concept plan options, including what an alternative concept plan may look like if it included a 'destination' open space site.

Inclusion of a Desired Character statement specific to the Bowden/Brompton site

Comment:

- In support of a specific Desired Character statement.

Recommendation:

- Council commits to continue consultation with community about this statement.

Infrastructure planning

I note the following in the draft Bowden – Brompton DPA (p.12):

A proportional cost share arrangement is being investigated for the provision of required infrastructure between land owners, State Government, Council and individual developers. In this regard it is noted that the Bowden/Brompton site has been selected as part of the Infrastructure Schemes Pilot Project being run by DPTI.

Comment:

- Given this site will essentially be an extension of the current Urban Core Zone, how can this site include similar urban design elements and planning that are evident in the BUV development?
- What has been the investigations as to whether the outlined area in draft Bowden – Brompton DPA can be formerly incorporated in to the BUV site? This would give the entire site significant project status under the State Government including then the application of stringent conditions on development that currently applies in BUV, for example the design guidelines and building green star rating requirements.

Recommendation:

- Investigate this formerly and seek a response from the State Government. Include also seeking formal confirmation/communications from the State Government about the storey heights that are envisioned for BUV DPA, particularly the areas adjoining the draft Bowden – Brompton DPA area.

Walking and Cycling

I note the draft Bowden – Brompton DPA states (p.25):

Walking and Cycling

The Area Affected has the potential to be well serviced by walking and cycling networks, particularly due to its location adjacent the Park Lands and close to the City. However, current walking connections to the Park Lands are poor with no signage, narrow footpaths, no dedicated crossing over Park Terrace adjacent the Area and poor connections under Park Terrace. Bicycle lanes are provided on Park Terrace, Port Road and Chief Street. While the majority of the Area affected does not contain bicycle lanes, bicycle movements are typically accommodated on street under a standard shared arrangement which is considered appropriate in a low-speed environment.

Summary/Policy Implications:

The quality of walking and cycling infrastructure within the Area Affected needs to be improved for amenity and safety reasons.

Comment:

- I support the need for excellent walking and cycling provision in this area. Especially given the impact of increased traffic due to increased density and mixed use.

Recommendation:

- Look to BUV – what has worked here well re pedestrian and cycle thoroughfares, what has not? Beware of creating wind tunnels and overshadowing on adjacent or close by building/homes.
- Although possibly beyond the scope of the DPA, consider including a bicycle lane separated from cars and pedestrians on the new development side of the road running along Chief Street stretching from the Outer Harbour Railway Line to Hawker Street.

User informed design and policies

Comment:

- There is a wealth of information from residents living in the existing suburbs of the proposed new Urban Core Zone, as well as the residents currently living in the BUV Urban Core Zone. To my knowledge since the beginning of the development in BUV there has not been a significant study about the user experience so far (i.e. residents, businesses, visitors etc.), auditing how the design guidelines are being delivered in reality and documenting of where opportunities for improvement may be in the future.

Recommendation:

- It would be timely for an independent study exploring user feedback from people living in medium and high density housing in BUV be undertaken so that they can share their lived experience of the area to inform the elements of the new development area. This should also include feedback from the adjacent suburbs. The Council could approach State Government about this.

Cultural Mapping

Note the following from Implementation Guide Development of Social Infrastructure in Growth Corridors (2012) about the value of cultural mapping:

In some areas, local history, culture and traditions may be a key aspect of the social and cultural context of the development. Understanding local stories, through oral history and other means, can provide important guidance for future development and influence the design, uses, character of new development so that it fits with and is meaningful to the existing community setting. History and cultural heritage are important elements to incorporate into planning for urban growth areas. The process is about identifying and recording elements of historical significance and suggesting how those features could be incorporated into development through means such as public art, signage, naming, trails, facade treatment, etc

Comment:

- It is not clear how cultural mapping will be applied to the newly proposed zone.

Recommendation:

- There is a wealth of information that has been gathered from BUV and the culture and history of the area. This cultural mapping information collected to date may need to be updated to reflect the new development area and new adjoining areas.

I also ask the Council to consider the following re the DPA and development of the area:

- A time frame be put forward for the development of the proposed Urban Core Zone that takes in to account the adjacent BUV development.
- Principles for the development should specifically reference supporting ageing in place and disability access by promoting adaptable housing as well as promoting residential amenity that includes privacy, accessibility, common outdoor space, storage and sociability.
- The landscape treatments of streets in new urban development areas should aim to reduce the impact of higher density developments and reduce the associated Urban Heat Island Effect (UHIE) of hard surfaces.
- The DPA is essentially adding another (or extending) an Urban Regeneration Zone in the City of Charles Sturt. The DPA investigations should explain how the proposed density heights are compatible with the City of Charles Sturt projected population growth, housing types and needs.
- What would be the expected impact if building storey heights adjoining Chief Street started at a lower density (2-3 story)?
- Embrace opportunities that emerge to preserve heritage in the new zone to be established
- Outline the expected traffic impact of the currently suggested density and current concept plan

Attachment 1





CONROY'S SMALLGOODS PTY. LTD.

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City of Charles Sturt

PO Box 1

WOODVILLE SA 5011

Attention: The Chief Executive Officer

By Email: psutton@charlessturt.sa.gov.au

Dear Paul,

RE: DRAFT BOWDEN-BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DPA - SUBMISSION

Conroy's Smallgoods supports this proposal. Our manufacturing business is a fourth-generation family business and has operated on this site for over 40 years ago. In recent years we have witnessed fast urban growth around us and now is the time to consider moving our manufacturing business to a new commercial area.

Thank you for providing the opportunity to comment on the Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA) that is on public exhibition until 28 September 2018.

Such changes in the community influence the way we operate businesses and live as residents; therefore, we believe consultation is a key aspect of the process.

In only a short period of time, Bowden and Brompton have both undergone huge renewal projects and continue to develop for the foreseeable future. The Bowden and Brompton area has transformed in density from small scale housing to high rise, modern living which previously was seen only in Eastern State cities such as Melbourne and Sydney. These works have positively altered the way the area is used, in comparison to as little as five years ago. As such, increases in resident numbers and demographic have attracted new businesses to the area and delivered a new level of vibrancy.

This combination of location and newfound unique character has created demand for housing and subsequent services within Bowden and Brompton, highlighting that further development of the area, where viable, should be encouraged.

It is clear upon review of the proposal, that the DPA aims to retain the Urban Core Zone status. The changes appear to enhance its current objectives and harmonize with the broader visions for the Bowden and Brompton area.

An increase in building heights creates an opportunity to not only address demand for housing, but introduces a variety of housing to the suburb, whilst still being compatible with current buildings in the area. An increase in resident numbers is anticipated to be mutually beneficial between Council, current residents and local businesses through economic investment.

The revised policies will encourage efficient use of land and provides increased potential to support local services, businesses and facilities. Furthermore, we believe that an increase in density will entice both government and international investment in the area as well as rationalise infrastructure upgrades.

We trust that this information is received as constructive feedback and request to be heard at the public meeting on Monday, the 15th of October 2018.

Thank you for considering this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Pat & Andrew Conroy', written in a cursive style.

Pat and Andrew Conroy

Joint Managing Directors

Mr Peter & Mrs Christine Freeman

26th September 2018

The Chief Executive Officer
City of Charles Sturt
P.O. Box 1
WOODVILLE SA 5011

This submission has been sent via email to Mr John Tagliaferri as authorised 26th September 2018 as I have also had problems logging on to the yoursay website over the last few days and this has not yet been resolved by the Council help desk.

Dear Sir

Re: DRAFT BOWDEN – BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DPA – SUBMISSION

I wish to make the following submission in relation to the above Development Plan Amendment.

BACKGROUND

A consortium of six land owners who control 80% of the land to which this development plan amendment pertains, have applied to the Charles Sturt Council to extend the adjacent Urban Core Zone to apply to the subject land.

We understand that that land is the portion of land is the land bordered by Second and Sixth Streets to the south, Hawker Street to the north, Chief Street and Ethelbert Square to the west and then east along Gibson Street to Ninth Street cutting back at the rear boundaries of several properties on Ninth Street until it reconnects to Drayton Street and then heads north east along Drayton Street to connect again with Hawker Street in the north.



This is a substantial portion of land which I note that Council's DPA document states it at approximately 11.5 hectares (excluding existing roads).

IMPACT OF REZONING THIS SUBJECT LAND AREA AS URBAN CORE

As such, any changes in zoning of this portion land of this size will have a large and possibly detrimental impact on the amenity of the Bowden and Brompton suburbs as it is located in the centre of them, with surrounding established detached and attached character homes and character businesses with attached homes (whether or not the new zoning regulations refer to them as that or not, since "substance over form" is only relevant here) and mostly of single story in height.

A sizeable number of them date back from the 1830's to the 1940's

ADDRESSING THE KEY FINDINGS CONTAINED IN THE DEVELOPMENT PLAN AMENDMENT PREPARED BY FYFE FOR CHARLES STURT COUNCIL AND THE CONSORTIUM LAND OWNERS

Our responses to the investigations undertaken to inform this DPA for Council and the consortium land owners are addressed under the topic headings used in the document and the relevant page number they appear on within the document

2.2.1 Anticipated Yield and Affordable Housing (Page 15)

The yield calculations have been calculated on maximising profits for the consortium land owners, at the expense of the new residents who will live in these buildings and the existing residents who live in the area. These residents will have to put up with increased traffic in narrow existing streets which were ever designed for this type of density living.

Clearly the street infrastructure surrounding the area will not be able to cope with the extra traffic and people. Most of the surrounding streets are so narrow that cars already are mostly prevented by Council parking restrictions from parking on both sides of the streets surrounding the area in question. However, we note that upgrade to cater for the increased traffic in the area is planned.

We note that there are approximately 900 townhouses and 600 apartments proposed totalling 1530 "boxes" in all covering 8.5 hectares which is planned to accommodate 2600 persons. This equates to a building space of .003 hectares or 30 square metres of building space per person but no land.

Conversely, with only 1.22 hectares of public open space, this equates to .00047 hectares or 4.7 square metres of open space for each person.

It is apparent that there are no detached dwellings even on small allotments within in this development proposal, so the demographic it targets are mainly the single person and/ or the married couple without children. It is apparent from the yield figures that families have been excluded from the equation.

But to be socially sustainable in the medium to longer term, a suburb should have a diverse demographic covering all living situations. When added to the existing Bowden Urban Core, this will become a social problem with a transient population who will only stay in the suburb for a limited time until their social situation changes. This will provide little suburb "ownership" or community spirit.

Affordable housing is an issue within the proposed rezoning area because this type of medium to high density living artificially reduces land availability. Whilst I think 15% as a minimum is too low because of the nature and size of this particular development when added to the existing Bowden Urban Core, I believe that the developers must provide more affordable housing in this area because of the super profit they will make on the consortium development of this land. Had they developed this land individually and each at different times, this DPA would not exist and they would each have made substantially less profit than they currently stand to.

Therefore, they have a social and moral obligation to people who would have purchased in Bowden/ Brompton under those circumstances, and to the residents of the suburbs in general, to give back to the suburb in the form of more affordable housing together with a plan for less density and the building of character buildings more in keeping with the surrounding and adjoining areas.

Additionally, Marble & Cement Group, Conroy Smallgoods Pty Ltd, HAAE Pty Ltd, Detmold Group, Gerard Group and Kennett Pty Ltd all benefitted from the purchase of cheap land which was previously held by the government many years ago after the MATS plan collapse.

Charles Sturt Council is the lone voice now that can make a stand on behalf of existing residents and ratepayers and enforce what is right for all people affected by this development. This proposal is a long term development proposal which must have a balanced approach of liveability, affordability, and demographic diversity and social inclusion and a character in keeping with the surrounding areas. These things are being incorporated within the latest inner city developments in many well informed and forward thinking cities in the world.

This DPA and surrounding development plans like it should not be about putting as many "boxes" on a piece of land and letting developers take the profit. There must be a social conscience to this development and we have not seen it to date.

Charles Sturt Council has a once only opportunity to be a leader in its field by ensuring that the development consortium bring these aspects to this development in Bowden – Brompton DPA. Life and living in a community it is about a quality of life, social inclusion a sense of community pride and sustainability, not just about maximising profit.

2.2.2 Existing Uses and Ownership (Page 16)

Marble & Cement Group, Conroy Smallgoods Pty Ltd, HAAE Pty Ltd, Detmold Group, Gerard Group and Kennett Pty Ltd all profited from the purchase of cheap land which was previously held by the government.

To substantially gain again from the DPA amendment rezoning proposal without putting something back into the area that has assisted them, is not in the public interest. Some of this profit must be used to make this DPA proposal more liveable and more in keeping with the character of the area.

There are a number of character and industrial buildings within the DPA rezoning area that we would like to see retained and incorporated in order to add/ retain some character within the development. These buildings could be repurposed as industrial buildings such as the Plant 4 site was in the Bowden Urban Core, but on a smaller scale and these could be used for cafe's, restaurants and housing etc.

The comment that “Many of the buildings within the Area are at the end of their economic life” is disputed and we would like to see a list of all buildings within the rezoning proposal that could be repurposed and renovated in order to retain an “industrial” and/ or character feel within the rezoning proposal. This will assist in retaining some of the industrial history of Bowden and Brompton within the rezoning proposal and add some diversity to the buildings themselves in order to remove some of the “concrete jungle” feel which will come from the proposal in its current state.

2.2.3 Topography (Page17)

No comments

2.2.4 Heritage (Page17)

Since it was laid out in 1839, Bowden and Brompton have been home to a mix of industrial factories, workers’ houses in the form of detached dwellings and row cottages, more substantial and character housing on substantial plots of land and a workplace for artisans and artists of varying kinds.

Many of the local streets were established in the 19th century. Consequently, roadways tend to be narrow and quiet with a small volume of traffic.

The continued provision and facilities for a mixed and diversified culture within the DPA should be incorporated into it and incentivised by Council, community and the consortium developers

Council now has a wonderful opportunity to right the wrongs done to the suburb by previous governments under the failed MATS plan, when large parcels of heritage and character buildings in these suburbs were knocked down in somewhat random fashion and destroyed forever before the plan was scrapped. This then allowed these very businesses that comprise the consortium of developers, to buy that land cheaply and expand their businesses cheaply in the area.

We do not oppose the benefits gained by redeveloping the DPA area to house people looking for inner city accommodation, in fact, done properly and in sympathy with the surrounding areas, it will reinvent Bowden and Brompton and right the wrongs done to the suburbs under that failed MATS plan.

The Bowden Urban Core concept has been a well-designed and well thought out plan that has been properly integrated under the independent control of the South Australian Government through Renewal SA. It has 3 existing open sides that do not have existing dwellings of note and certainly not the bounded density of character homes and dwellings that exists for the area under the DPA proposal. It is a completely different development – a completely different animal, with many more integration issues.

We do however object to vertical gated communities that isolate people from the rest of the communities that they live in and which do not contribute to a sense of community or community thinking and well-being.

All existing buildings that are important to the character of the two suburbs contained within and streets adjacent to the DPA zone must be protected, and any development within the DPA zone

should be in sympathy with those buildings. They should not be overshadowed by the height of those buildings.

The heritage of any area is more than just the sum of a few buildings. It is based on the whole character of a suburb(s). This principle needs to be understood and supported by Council, not only for the DPA zone but for the suburb as a whole where we see many fine character homes being demolished only to be replaced by characterless boxes – all in the name of progress. A great example of this is Chief Street and 81 West Street in Brompton. Please take a look sometime – we should all hang our heads in shame.

2.2.5 Existing Vegetation (Page18)

We support the continued planting of trees and vegetation, not only in the DPA but in the suburbs as a whole.

We believe Council has improved the streetscape of many streets in the area by actively planting trees and vegetation as part of its planting program. We see this as an important aspect of the development of the DPA.

Council is to be congratulated on progress made so far in this area.

We would like to add, however, that we would like to see a more active retrofit program adopted where trees have either died or been destroyed by vandals so that the trees continue to grow in a uniform pattern throughout new initiatives. Nothing looks worse than to see trees destroyed and not replaced.

However we disagree with the statement made in the DPA document that “The trees may (in part) assist taller buildings being able to be accommodated within the Area without detrimentally affecting the amenity of the existing properties to the north-west.”

Unfortunately, you can’t make a silk purse out of a sow’s ear. The existing height of the buildings within the DPA zone fronting Chief Street to the west and Hawker Streets to the north and north-west are currently two (2) stories high and should remain at that height within the new DPA to transition to single story buildings on the opposite side of all boundaries imposed by the DPA.

Trees will not improve the amenity of the existing properties in these locations or, in fact, any others surrounding the proposed DPA site if the buildings are higher than the existing 2 story height.

2.2.6 Building Heights (Page 19)

We have no opposition to increasing population densities to meet the needs of current housing markets in inner suburbs if government and or other instrumentalities cannot afford to fund infrastructure (including transport corridors) and/ or other utilities in the outer suburbs of Adelaide.

However, we do most strongly object to the production of concrete canyons along what are minor street-scapes.

However, the **Summary/ Policy Implications under this heading in the DPA document states that:**

“Maximum building heights within the Area Affected will range from 2 storeys to 5 storeys. These building heights are based on accepted urban design factors and the need to provide an appropriate interface with adjacent residential development.

Taller buildings are proposed adjacent to the Bowden Urban Village to the south and behind building podiums along Chief Street. Built form elsewhere will transition to lower building heights at the interface with adjoining residential development”.

Multi storey buildings did not exist historically within or adjacent to the proposed DPA. Therefore any move to increase building heights in this “building locked” area now will have a major impact on the surrounding area in question given the size of the DPA and also, when it is added to the exiting Urban Core development so far.

Where the DPA will be adjacent to the Bowden Urban Core, we have no opposition to buildings of up to five (5) stories in areas of the development that are mostly immediately adjacent to and within sympathy with that Urban Core. However, there are a number of single story character dwellings that we would like to see retained within the proposed DPA area and there are also newer 2 storey residential buildings adjacent to it on Gibson Street and surrounds that abut, or almost abut, the Core.

These would require that a DPA building height not exceeding two (2) stories on these boundaries is maintained for the DPA to transition in an orderly fashion and a sympathetic form.

In fact, all of the buildings on all boundaries of the DPA should be no higher than 2 stories as this is what they currently are and we see reason to change this as it creates a good segway between the existing DPA boundaries and all adjacent land and is a concession residents and developers should be able to agree on for the better good.

This includes all of the development along the eastern side of Chief Street including the old gasworks site upgrade, whether currently vacant or not. It also encompasses the DPA and the Bowden Heritage Precinct from the corner of Chief and Hawker Street to the bridge overpass at the southern end of Chief Street. Of-course the heritage wall on the old gasworks site should be retained and left at its existing height.

Again, the **Summary/ Policy Implications under this heading in the DPA document states that:**

“satisfactory building height interface with the lower scale development (2-3 storeys) to the north and east of the Area Affected Proposed higher buildings along Chief Street”.

This statement is strongly opposed for any building height over 2 stories for the reasons outlined above. This is because of the overshadowing effect on adjacent properties of the transitional canyon effect that would result for which Churchill Road and the northern section of Prospect Road to Regency Park has become infamous for within the Prospect City Council Area. No one would want that disgraceful effort replicated in our suburb.

2.2.7 Environmental Assessment (Page 20)

No comment other than to say that it is presumed that all site contamination, whether air-born or otherwise, will be contained at the cost of the consortium development and handled by professional experts in such a manner as to have a zero negative impact on surrounding residents, employees in surrounding businesses and workers on the DPA site for the life of the project until final completion and successful handover of the project deliverables.

2.2.8 Adjacent and Proposed Zoning (Page 22)

The Summary/ Policy Implications Statement under this heading states in the DPA document states that:

“While a specific Desired Character statement is to be developed for the Bowden/Brompton site (see Attachment A), a number of existing policies for the Urban Core Zone are considered of relevance and will also apply to the Bowden/Brompton site.

We would like to see the Desired Character Statement once it has been adopted but before any approval has been given so that we can make comment on this area.

We see this DPA proposal as the “thin edge of the wedge” regarding rezoning in Bowden and Brompton so far as it has already extended the concept of the Urban Core past the existing limitations allow regarding proximity to transit corridors, transit stops and major public transport nodes.

Therefore we would like Council to understand that we are strongly opposed to any further extension of the Urban Core zoning concept and the further negative impact it would have on the quality of life for residents in the suburbs of Bowden and Brompton and an approved Desired Character statement would go a long way to understanding what Council accepts and what the future holds for the suburbs regarding rezoning.

Existing building setbacks should be increased to afford adjacent residents further amenity to increased building density to give the impression of some space within and without the development.

At worst, existing setbacks should remain where they currently exist however where they are considered inadequate given the size and proximity of the development to adjacent landholders they should be increased to give the perception of space.

2.2.9 Transport (Page 22)

The Summary/ Policy Implications Statement under this heading states in the DPA document states that:

“Additional ‘local road’ connections be provided between Chief Street, East Street and Drayton Street (oriented north-west to south-east). Additional ‘local roads’ or ‘laneways’ be established

south-west to north-east. Additional vehicle connections to Chief Street are considered to be undesirable, however these streets should provide cyclist and pedestrian connections.”

Whilst we consider that the foregoing is admirable and will assist in handling the additional volume of traffic that will be generated by this DPA, the Bowden Urban Core and the Bowden Heritage Precinct developments directly within those areas, we are concerned about the impact on other local streets in the area and their ability to handle the flow-on and through flow traffic that these developments will generate without any traffic management or other improvements that will be afforded directly to traffic corridors that generate that additional traffic.

In this regard, we are concerned that other than Chief Street, West Street remains the only flow through street from Hawker Street to Torrens Road that will directly service traffic from these new developments to Torrens Road.

West Street is solely a residential street from Hawker Street to Fifth Street and continues to be a dangerous street to traverse in a car because it is so narrow and it has a blind intersection at Fifth Street which has already claimed a life or two.

Various attempts have been made to reduce the volume and slow vehicular traffic in this West Street with some little success. This is because vehicles travelling east toward the city along Torrens Road in the morning tend to use it as a shortcut to “beat the traffic lights” at the corner of Torrens Road and Chief Street, whilst traffic travelling from the city west down Hawker Street after work tend to use it as a shortcut to beat the traffic lights on the Corner of Chief Street and Torrens Road.

The slow traffic sequences for traffic using Chief Street to turn onto Torrens Road and vice versa are notorious compared with the sequencing for the straight through Torrens Road traffic.

West Street already has staggered parking in the street because it is so narrow and making it a one way street would unfairly inconvenience local residents all of the time for a problem which only exists for approximately 2 hours each day on weekdays in the morning from 7:00am - 9:00am and two hours each day on weekdays in the afternoon from 4:30 pm – 6:30pm.

One solution would be to make West Street a “No Right Turn” road from Torrens Road from 7:00am to 9:00am on weekdays and a “No Right Turn” road on Hawker Street from 4:30pm – 6:30pm on weekdays.

This would of-course necessitate changing the traffic light sequence at the corner of Chef Street and Torrens Road in order to provide a longer right turn time into Chief Street for traffic heading east along Torrens Road and similarly a longer right and left turn time into Torrens Road for traffic heading north along Chief Street. This would incentivise drivers to use Chief Street more than at present.

We understand that the fish and chip shop on the corner of West Street and Torrens Road have a submission before Council to make West Street a one way street, however they are only open for a few hours each evening (excluding Tuesdays) and this would severely inconvenience local residents in the street all of the time.

They have a public car park directly across the road from them on Torrens Road which should service their needs and car parking in front of that particular row of shops should be stopped as it is dangerous for traffic as the vehicles pose a blind spot for Torrens Road traffic when sitting at West Street. Similarly there is currently facility for a one or two cars to park just in from the corner of

West Street and Torrens Road on the eastern side of West Street. This poses a serious danger to vehicles entering and exiting West Street onto Torrens Road because they are in a blind spot for vehicles entering West Street because of the shop corner.

The existing Hawker Street railway crossing traffic bottlenecks will need to be addressed as will be the bottlenecks which already exist at the Hawker Street/ Park terrace intersection. Both these issues will only be exacerbated as a result of additional traffic flows caused by the DPA and the Bowden Heritage Precinct Development.

Whilst the Brompton Urban Core and the Brompton Heritage Precinct may be within 400 metres of the new Bowden Railway Station, a major portion of the DPA is not, as it tends to be closer to Hawker Street by its very position.

This will mean that the quality and timeliness of bus services travelling along Hawker Street may have to improve to cater for the additional commuters to and away from the city for work/ study etc. that the DPA will bring.

This will need to be investigated and resolved by relevant authorities.

2.2.10 Stormwater (Page 26)

No Comments.

2.2.11 Service Infrastructure (Page 29)

No comments other than water pressure in the Bowden Brompton Area is not as good as some other inner suburbs. What will be done to maintain or improve water pressure to existing residents in the area after these new developments occur and will this guarantee acceptable water pressure in the future after the developments are completed.

2.2.12 Activity Centres (Page 29)

The Summary/ Policy Implications Statement under this heading states in the DPA document states that:

“The preferred location for commercial and retail development is the corner of Chief Street and Hawker Street, to capitalise on the higher visibility and frequency of passing traffic along Hawker Street, as well as the proximity to public transport routes.

This location will also allow for greater separation from the Plant 4 retail facilities within the adjoining Renewal SA Bowden redevelopment.

While the Urban Core Zone policies generally support the concept of mixed-use developments, it is proposed that the more specific Desired Character statement for Bowden/Brompton reflects this opportunity (see Attachment A).”

We have no issues with this proposal except to say that the building heights for these commercial and retail developments should be no higher than the existing buildings that they are replacing which, is two (2) stories.

There should be enough set back from Hawker Street and Chief Street to provide the perception of space and the character of these proposed buildings should be in keeping with the residential character of the existing houses opposite these proposed DPA buildings on and nearing the corner of Chief and Hawker Streets and also directly opposite the DPA on Hawker Street.

2.2.13 Social Infrastructure (Page 29)

It is interesting to note that the DPA document reports that is minimal need is projected for facilities such as aged care, primary education, secondary education, early childhood facilities and community facilities.

This typifies the lack of diversity in this development. A successful development should have the characteristics of diversity in people and diversity in buildings to ensure a long lasting, happy sustainable and involved community.

We are concerned that this DPA seems to focus its appeal mainly toward single people and mainly married couples with no children, which is of considerable concern for the ultimate well-being of this project.

2.2.14 Consultation (Page 31)

No comments.

2.2.15 Concept Plan (Page 32)

We note that this is only a concept plan and all interested parties including the adjoining residents should be notified when concept plans are amended as a matter of courtesy and respect. We should also be invited to comment when these plans are changed so that we can provide a balanced and fair approach to this DPA which is accorded no doubt to other interested parties.

We are, after all, the ones who pay the ongoing rates.

END



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Builders Licence No G 5047
ABN 69 007 578 494

marcemsal@picknowl.com.au

28 September 2018

City of Charles Sturt

PO Box 1

WOODVILLE SA 5011

Attention: The Chief Executive Officer

By Email: psutton@charlessturt.sa.gov.au

Dear Paul,

RE: DRAFT BOWDEN-BROMPTON MIXED USE (RESIDENTIAL AND COMMERCIAL) DPA - SUBMISSION

Introduction

Thank you for providing the opportunity to comment on the Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA) that is on public exhibition until 28 September 2018.

Council has prepared the Draft DPA to rezone a portion of the existing Urban Employment Zone within the suburbs of Bowden and Brompton in the Charles Sturt Council Development Plan to Urban Core Zone. This policy amendment change seeks to facilitate higher density residential and mixed-use development.

Marble & Cement Work Group strongly support this change of zoning and encourage the Council and Minister to proceed expeditiously with the rezoning process.

Background

A Master Plan has been prepared for the existing Bowden/Renewal SA mixed use development located south of the subject site. The Bowden Master Plan proposes the construction of a new vibrant and dynamic urban village that will deliver a level of mixed uses and accommodate a range of functions, activities, housing typologies, and people. The Bowden/Brompton area is an ideal location for development and contains great potential to develop into a vibrant and attractive neighbourhood. Furthermore, the subject land has a unique industrial identity, is well-connected to the Adelaide CBD, and is in proximity to public transportation.

In general terms, the draft rezoning proposal of the Bowden–Brompton Mixed Use (Residential and Commercial) DPA will create a positive contribution by establishing pre-conditions to enable the suburbs of Bowden and Brompton to development and flourish.

This is further reinforced through the investigations undertaken by Fyfe Pty Ltd, indicating the subject land is well suited to accommodate residential infill and can be economically serviced.

Discussion

While the proposed policy framework is strongly supported and will assist in achieving a greater level of flexibility within the site, Marble & Cement suggest that Council should consider deletion of many of the specific development prescriptions noted within Council's *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* and proposed policy settings and these prescriptions should more appropriately be assessed and addressed within individual development applications with their considered master planning and engineering assumptions.

The requested amendments to the *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* for the Charles Sturt Development Plan of the Draft DPA are attached and discussed below.

Marble & Cement support the view that the restrictive height limit contained in the Council's Concept Plan will not achieve the densities cited by Council nor the anticipated yield of 1500 dwellings.

Specifically on the Marble & Cement Land, we suggest that building heights should be maintained at a consistent height of 5-6 storeys, with majority of the area being 5 storeys, and with 6 storeys along the boundary of Chief Street, Second Street, and Sixth Street, as the current Urban Core Zone adjacent to the subject site already seeks development of up to 6 and 8 storeys. We do not believe that internal sites bordering any proposed open space reserve require any reduction in building heights and in fact such areas present an excellent opportunity to interface this open space with reserve framing building height forms of ie 5-6 storeys. Finally, we do acknowledge that Development should transition down to lower heights of a 2-storey maximum along sensitive interfaces as sought in the DPA.

MCW acknowledges the importance for developments to accommodate stormwater infrastructure (as applicable) and suitably sited open space. The proposed location of stormwater detention and open space, as indicated on Council's Concept Plan however, is suboptimal in terms of land ownerships, development flexibility, relationship to the existing pug holes, and most importantly in terms of stormwater flow directions. We believe this needs further review in the context of alternative open space and stormwater management mechanisms, whether stormwater detention is required in a circumstance where the proposed development may, in fact, reduce flows over current conditions and in dealing with the ownership complexities of this site. For the avoidance of doubt, we expect that further engineering review will dictate that stormwater detention throughout the DPA site area is unnecessary as future stormwater outcomes will likely out perform /reduce the existing pre development flow volume status. We do expect however that some cleansing will be required and could likely be managed within ultimate planning submissions detailing suitable cleansing trails designed into suitable open space areas.

With regards to open space, the proposed concept plan prescribes two centrally located open space islands which traverse multiple ownerships (even with the Marble & Cement Group) across the plan. Similarly the proposed concept plan prescribes open space (buffer) along Second Street and we must question the application and benefit of such a prescription as it is evident that the natural contours of the land will certainly not support an stormwater detention in this location. Marble & Cement would recommend that Council delete all reference to these open space areas altogether and instead work with the ultimate developers in line with existing planning legislation to provide the desired 12 ½% open space at suitably determined locations that consider the ultimate master planned site uses and design objectives each respective site. Ultimate designations of open space should consider public and built form interface, location, size and orientation which also contemplate natural contours and any likely stormwater cleansing trails.

Finally, Marble and Cement are of the view that the reference on the Proposed Concept Plan detailing "minimise Vehicle Connections to Chief Street" is again an over prescriptive denotation and should be deleted and replaced with a notation referencing potential commercial/retail uses.

Policy Matters

The following comments relate to specific policy provisions within the Development Plan Amendment.

The DPA does not insert the "*Bowden Brompton site*" reference into PDC 31. This should be altered because the incentives in PDC 31 (triggered by the provision of sunlight access and allowing certain concessions on car parking and increases in height) should be extended so that they apply equally to the new rezoned area. The incentives could be readily inserted by simply referring to "*Bowden Urban Village and the Bowden Brompton site*" in PDC 31 for the Urban Core Zone (at page 280 of the Development Plan).

Item 13 relates to public notification in the Procedural Matters section of the Development Plan. Public notification commences at page 286 of the current Urban Core Zone. Given the likelihood that the land will be developed for dwellings in various formats, (but quite probably, group dwellings and/or residential flat buildings as defined), it is important to ensure that the intention to have those dwelling forms listed as Category 1 in fact eventuates. The decision of the Environment Court in the case of *Lewis v Campbelltown* makes it possible that a proposal for two buildings of residential flat buildings will be treated as a Category 2 form of development contrary to the intent of the existing zone. It would be prudent to expressly amend the Table to use phrasing such as "*one or more dwellings*", "*one or more group dwellings*", "*one or more residential flat buildings*" to put the matter beyond doubt.

The terms of the Desired Character Statement in Attachment A (mentioned at item 2 of the Amendment Instructions Table) should incorporate the following amendments:

- In the sixth paragraph we suggest deleting the words "*be of lower height to*" in the first and into the second lines, so that the sentence reads "*Development around the western, northern and eastern periphery of the Bowden Brompton site will complement the streetscape and provide an appropriate transition to lower scale residential areas outside of this zone*". The key urban design object is the transition. Whether this is dealt with by height or a combination of height, set back, massing, etc, should be left to the contextual design. The policy need only specify the object, not the means to achieve it.
- Paragraph 8 of Attachment A on the bottom of the first page refers to limiting access for vehicles to Chief Street, Hawker Street and Drayton Street. This could be left to the overall design and master planning of the site rather than prescribing this issue in such terms. This paragraph would ideally be deleted and perhaps replaced with a paragraph which says something along the lines of "*Chief Street, Hawker Street and Drayton Street may be upgraded over time to improve pedestrian and cyclist movements as well as on street parking, landscaping, and road safety. Some road widening may be required*".

- Paragraph 9 (the first paragraph on the second page of attachment A) prescribes the location of open space throughout the zone. The location, size, and orientation of open space will depend on a range of factors yet to be clearly resolved, including the approach to stormwater management, the design, siting, and orientation of buildings and access points, the precise location of roads and pathways, the treatment of site contamination hot spots and pug holes, and the location of ownership boundaries. The way in which all of these matters are addressed will have a bearing on what open space is able to be provided and where. We suggest that this paragraph should express a general intent for open space provision but acknowledge that a range of factors will influence the ultimate distribution of open space.
- Paragraph 11 refers to sensitive land uses being designed to minimise negative impact on existing uses. Given that this is an area in transition and that the transition may occur over a period of 10 to 15 years it is inappropriate to require permanent design solutions for a relatively short-term transition period. The policy would better refer to temporary mitigation measures rather than prescribing that the design and construction of buildings will be influenced by land uses that are very likely to vacate the area within a relatively short time.
- Paragraph 12 ought to be substantially reworded. The last sentence commencing "*Due to these circumstances ...* " should be deleted. The introductory sentences should be replaced with the following "*Development will need to respond appropriately to any site contamination*". That is a sufficient policy basis for whatever existing site contamination there may be to be taken into account in the planning and design process. Whether any contaminants are removed, contained, remediated in situ etc will depend on a variety of factors and is subject to the controls under the *Environment Protection Act*. Likewise, the development solution is likely to have an effect on the remediation approach (for example, excavation of contaminants for underground car park areas, retention of some materials beneath sealed surfaces etc). There is no need to specify how the assessment and audit system under that Act will apply.
- Paragraph 13 refers to stormwater run-off. Given that there are a range of solutions to stormwater run-off and that the existing run-off from a largely impermeable locality is likely to be improved by modern development, it is considered unadvisable for the Development Plan to prescribe the stormwater solution. There may be better options open to innovative engineers and designers. These may also depend on the where and how open space is provided. There is no sequencing or staging sensitivity for stormwater management (the land is relatively flat and presently impervious). There are no critical strategic issues to be addressed at the large scale. Instead, this can be readily addressed as each development takes place. This paragraph should be deleted and reworded as follows "*stormwater run-off detention may be managed in several ways. Indicative potential locations for detention basins (if required) are shown on concept plan map ...* ".

Concept Plan Map Charles Sturt 31 and should be revised.

We understand our consultant Holmes Dyer has supplied an alternative Concept Plan which identifies the preferred height arrangements across the rezoning area. Significantly, we do not propose to alter the height of buildings at any point along the Chief Street, Hawker Street, Drayton Street, and Gibson Street zone boundary interfaces, thereby achieving all that Council is seeking in terms of transition to adjoining areas, but do propose increasing the internal density to increase the prospect of delivering a viable development outcome.

This plan has deliberately removed open space, stormwater, road and pedestrian locations, and vehicle connections. We believe the plan needs to provide flexibility and that broad policy statements on these matters probably better facilitate a viable outcome for the area. To this end we support the attached plan Concept Plan as prepared by our planning consultant Homes Dyer.

Conclusion

As indicated, while the proposed Urban Core Zone will assist the policy framework in achieving a greater level of flexibility within the suburbs of Bowden and Brompton and is strongly supported, the requested amendment to *Concept Plan Map ChSt/31 – Bowden/Brompton Urban Core Zone* and to selected policy provisions will provide appropriate, increased development opportunities in alignment with the aims of the Bowden and Brompton area.

We trust that this information is received as constructive advice. We would like to reserve our right to be heard at the public meeting on Monday, the 15th of October 2018.

Thank you for considering this submission.

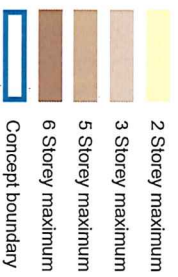
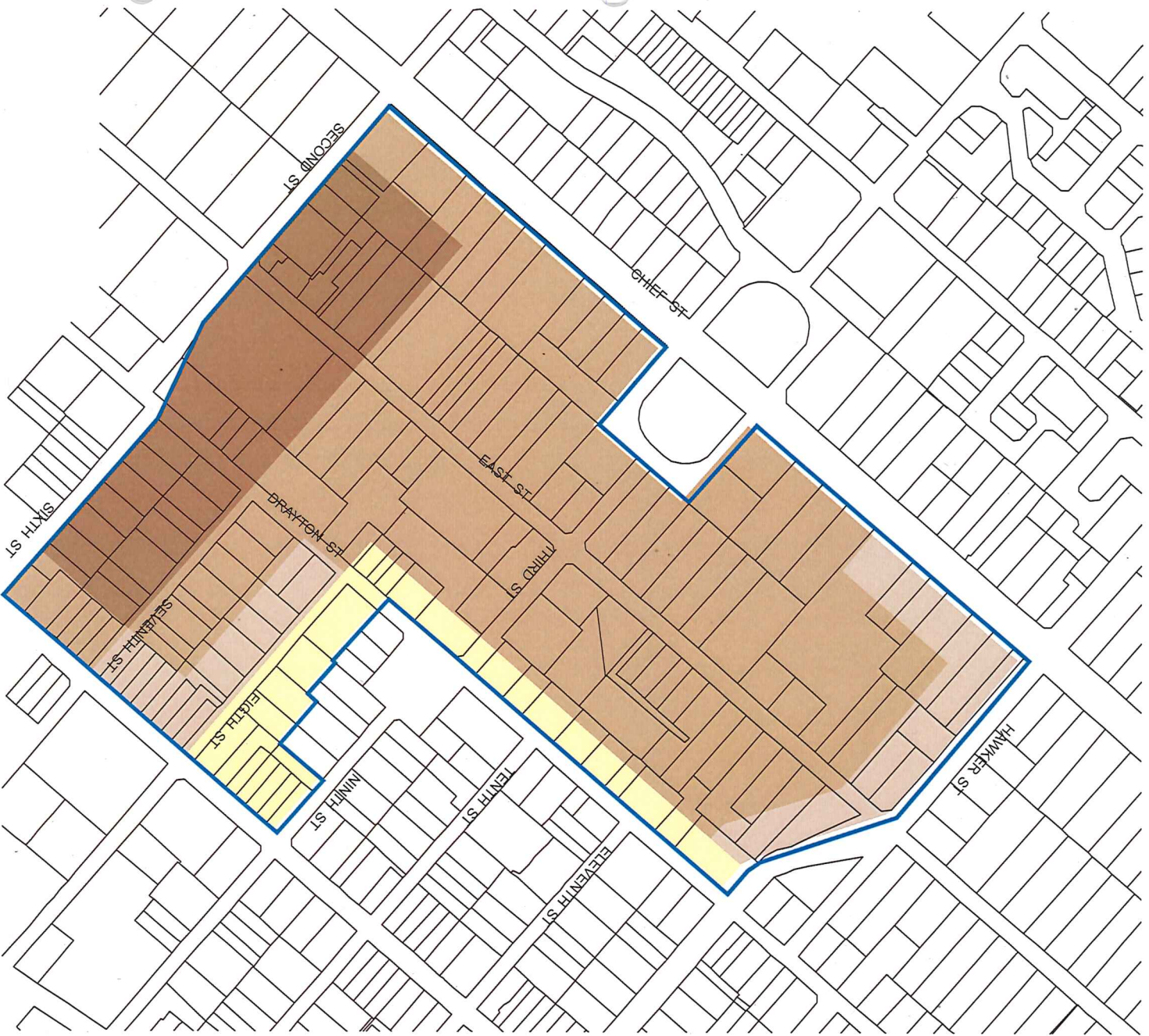
Yours faithfully,



Anthony Andolfatto

MCW Co Director





CONCEPT PLAN



Respondent No: 5
Login: Mike - West Street
 Brompton
Email: [REDACTED]

Responded At: Sep 24, 2018 11:59:14 am
Last Seen: Sep 24, 2018 01:10:12 am
IP Address: 127.0.0.1

Q1. Name Mike van Alphen

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 55-64

Q6. Provide your written submission on the DPA here.

1) Traffic and Parking: As a long-term resident in this area I find that the width of the narrow streets in this neighbourhood are not adequate to provide for significant increases in population. Existing development in Bowden in the last 2-3 years has shown that these developments are failing to provide adequate access and off street parking. A road such as East Street should be substantially widened to allow for traffic volumes. 2) Traffic and Parking (continued): Adequate dwelling or garage sizes are needed, locally it is common for tenants to convert their off-street garage into an additional room and park vehicles on the Street for example. There also needs to be some administrative control on the number of vehicles associated with a property and parked on the street. Locally there are 2 bedroom flats with 3x cars parked on the street. There should be no need for or reliance on street parking in future developments, the streets are too narrow. 3) This project allows potentially for a small number of corporate residential property owners. The type of land-tenure in the resultant development should be managed so that the ownership models permit South Australian ownership and a significant proportion of owner-occupied dwellings. A stable community also requires a greater mix of facilities the current residential-dominated situation at Bowden is not a community. A stable community also requires a stable population and there are already signs of problems with high-turnover of the tenancies in flats and apartments in Bowden-Brompton. Visible impacts include furniture-removal trucks regularly parked on roads, furniture dumping on the streets. New residents leaving rubbish-bins on the footpaths continuously and not learning the local controls, requirements and by-laws of Charles Sturt council. Some measure to ensure there is a component of long-term residents is necessary. 4) Decontamination of the former SA Gasworks site is a significant step that must be taken now to ensure that ongoing development such as that proposed is safe and secure from this legacy of severe coal gasification related soil and groundwater contamination. It is suggested that there should be a moratorium on adjacent development until such time as it can be demonstrated that the SA Gasworks site can be decontaminated without causing adverse impact on nearby properties. It is possible that residential development now in close proximity to the former SA Gasworks site could potentially impact on the necessary decontamination works for this legacy seriously contaminated site. 5) There is no consideration of controls relating to overshadowing or overlooking of properties associated with the construction of tall buildings. There is no consideration of the potential impacts of tall structures on solar panel installations. While this may or may-not be a factor in this particular development, the potential of building developments to destroy solar access needs to be part of the assessment processes that City of Charles Sturt carries out.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm? No

Q8. I found the information easy to understand Agree

Q9. I had adequate notice to get involved with the consultation Agree

Q10. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q11. How could the consultation/activity be improved?

No suggestion but to suggest follow-through and consider feedback and respond to it, consultation does not end when a response is submitted! Thanks.



Respondent No: 6

Login: NK

Email: [REDACTED]

Responded At: Sep 24, 2018 15:35:34 pm

Last Seen: Sep 24, 2018 06:03:43 am

IP Address: 127.0.0.1

Q1. Name Nick Kalaitzis

Q2. Postal Address [REDACTED]

Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 40-54

Q6. Provide your written submission on the DPA here.

Brompton and its surrounding areas have a strong importance to me, both as a land owner and as a former resident. I had lived in Brompton for well over 35 years until I relocated to a nearby suburb. I frequent the Brompton area on a regular basis, visiting the area at least twice a week. I have seen Brompton as a child, teenager, an adult and I will continue my interest in the area as an elder. I have seen many changes in the area and I have always supported the local community. As a current land owner within the affected area to be considered in the rezoning, I am in favour of the proposal. Growing up in an industrial area was relatively unique. With very few neighbours and houses, the area was drab with grey scaled factories. The droning of factory machinery and incessant trucks made the area less desirable for people seeking homes in the area. Our house was surrounded by industry, and when the Brompton area was developed with housing in the late 80's, it was very welcoming. We had people to talk to. We made friendships. We started to become a community. The Bowden Precinct in recent years added a cosmopolitan feel to the area that is immeasurably predominant in other areas of the world. Existing drab factories (i.e Plant 4) have been revitalised with many visitors frequenting, including myself. I believe the area no longer warrants large industry, as the infrastructure has been congested. The proposal should include a mixed zone, which would see not only homes but retail (café's, boutiques etc.) fill the void. I have read the Development Plan Amendment (July 2018) in its entirety and strongly believe that the proposal is a step in the right direction to revitalise an area and would complement the Heritage SAGASCO proposal. The Brompton area will become increasingly attractive, not only to homeowners but to visitors to the area.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm? Yes

Q8. I found the information easy to understand Agree

Q9. I had adequate notice to get involved with the consultation Agree

Q10. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q11. How could the consultation/activity be improved?

not answered



Respondent No: 8

Login: lakalaka

Email: [REDACTED]

Responded At: Sep 27, 2018 21:43:22 pm

Last Seen: Sep 27, 2018 11:46:12 am

IP Address: 127.0.0.1

Q1. Name	MS
Q2. Postal Address	Chief Street, Brompton
Q3. What is your interest in this project?	resident
Q4. Please specify 'other'	not answered
Q5. Please select your age category	40-54
<p>Q6. Provide your written submission on the DPA here.</p> <p>The DPA investigations report states that traffic to the area, especially Chief St and Hawker St, will increase. Although these roads are defined as distributor roads to direct traffic from arterial roads to local roads, there already is a significant amount of through-traffic on these roads by non-residents, who use them as short cuts between major roads. Therefore, it should be considered to declare these distributor roads 'local traffic only', which corresponds to their intended purpose. In order to limit the noise impact of increased traffic on Chief and Hawker Streets, traffic noise mitigation measures should be considered along the full length of these two roads (into adjacent areas), such as improved road surface and subsidies for noise barriers/front walls to shield existing properties on these roads. Commercial use in the rezoned area will create influx from non-residents, with the intersection Hawker/Chief St being flagged as the major area for low-impact retail. Therefore, local residents in adjacent areas, especially along Hawker and Chief St. should be given priority for on street parking. Low-impact should not be concentrated in one area but rather be spread out across the area to spread the traffic load of commercial users and break up the monotony of residential dwellings with small retail. The Bowden development means that the area between South Road, Park Terrace, Torrens Road and Port Road experiences a significant influx of residents and user of commercial services. Therefore, it seems questionable that the area can support another 1,500 properties resulting from this DPA, without significantly reducing the quality of life of existing and new residents, and putting a strain on existing infrastructure. Therefore, the number of new dwellings should be reduced from the planned 1,500 to a more sustainable number.</p>	
Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm?	No
Q8. I found the information easy to understand	Unsure
Q9. I had adequate notice to get involved with the consultation	Unsure
Q10. I was satisfied that I was provided with adequate opportunities to have my say	Unsure
Q11. How could the consultation/activity be improved?	not answered



Respondent No: 9

Login: Sophie Lazenkas

Email: [REDACTED]

Responded At: Sep 28, 2018 08:02:33 am

Last Seen: Sep 27, 2018 22:29:26 pm

IP Address: 127.0.0.1

Q1. Name Sophie Lazenkas

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 55-64

Q6. Provide your written submission on the DPA here.

I refer to the letter and associated documentation related to this DAP dated 1 August 2018, provided by Craig Daniel, Manager, Urban Projects. I have several concerns I wish to raise in relation to this Draft Plan. The Bowden-Brompton area is close to the city and is therefore becoming an increasingly desirable place to live. With this development Council must not only take the amount of additional ratepayer dollars that come into its coffers. Councillors and planners must consider the amenity to existing and new residents, the kind of atmosphere and community it wants to create, and how developments can best serve and integrate that community. No-one wants an inner-city ghetto that makes things worse for everyone who lives there rather than better, adds to existing problems rather than tackling and solving them. In considering this development, there is one simple question Councillors and planners must ask themselves before embarking on it, and that is 'how would I feel if what is being planned directly affected me'? This should be the yardstick from which to proceed. In my view, that most fundamental question never gets asked. • It is very clear from the current Bowden development that traffic in that area has substantially increased. It is obvious that sufficient off-street parking for owners and visitors is not available in relation to that development so it is already quite congested. If this proposed development goes ahead it must have sufficient off-street owner and visitor parking area(s). Off-street parking is already a big problem on Chief Street. As a long-time Chief Street resident with no off-street parking I am particularly concerned that the existing problem will be seriously exacerbated: this development must not make the situation worse. • Serious traffic management measures are required on Chief and Hawker Streets. There is no doubt this new plan will substantially increase traffic on both streets and in the area overall, and add to the already huge problem. With this development Council and planners must act in the interests of the existing residents of Chief and Hawker, and the area more broadly. Significant changes must be made to those roads along their entire length, with the purpose of seriously reducing their attraction as short-cuts for motorists. To leave things as they are, or make minimal cosmetic changes will constitute sheer negligence on the part of Council and planners. To paraphrase my earlier question: how would you feel about it if it was your street? Existing residents have every right to expect that this development does not add to the burden. Existing residents have every right to expect that they are not disadvantaged because of it. The 40 kmh zone must be retained. Chief and Hawker Streets must no longer be designated as collector roads, and major treatments must be put in place to deter and redirect motorists out of the area and onto Torrens/Park/Port Roads. • Has the local community complained of a lack of local commercial services that would warrant their inclusion in this plan? As a long-time resident of the area I am amenable to more housing but am not in favour of mixed development, and I would like to have the rationale for it explained, particularly since the current development in Bowden already has a commercial district. I look forward to the public meeting on 15 October.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm? No

Q8. I found the information easy to understand Agree

Q9. I had adequate notice to get involved with the consultation Agree

Q10. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q11. How could the consultation/activity be improved?

not answered



Respondent No: 10

Login: LCHolmes

Email: [REDACTED]

Responded At: Sep 28, 2018 14:22:09 pm

Last Seen: Sep 28, 2018 04:31:31 am

IP Address: 127.0.0.1

Q1. Name Lindsay Holmes

Q2. Postal Address [REDACTED]

Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 65 plus

Q6. Provide your written submission on the DPA here.

Items are addressed against the DPA headings indicated by headings, para and page numbers. 2.2.1 Anticipated Yield and Affordable Housing..... 15 The DPA recommends a minimum of 15% affordable housing. This is inadequate and ignores low-income and social housing which was integral to the area prior to the state government's purchase of housing to make way for the MATS plan. To be a socially healthy community, the Brompton and Bowden area requires a mix of housing to suit short, medium and long-term housing for singles, couples, share housing and family housing. To not provide for family housing undesirably reduces the DPA area to one which people will use for short term and transitional housing. The scrapping of the MATS plan aided and abetted the removal of low income and social housing from the precinct giving way to an influx and expansion of industry. The DPA proposers economically benefited by purchasing the land from the state government. They removed houses that could have been returned to the property market. In the 1980's, at least 13 East Street houses were demolished between Hawker and Second Streets, some to make way for car parks and some for warehousing or factory uses. The DPA recommendations are inadequate given the precinct and surrounding areas history. The history of the area as a low socio-economic housing area needs to be recognised in the DPA by repurposing at least 30% of land for low income, social and affordable housing. The character of the precinct must recognise and promote a long-term social purpose, and council's supporting of the Private DPA should not favour the maximisation of profit for land owners who have already been privileged by, and benefitted from, the scrapping of the MATS plan. Charles Sturt Council is the only voice that can take up this social purpose on behalf of its residents. To do so will recognise the history and establish a social future for the area that recognises that we live in a society, not just an economy. 2.2.2 Existing Uses and Ownership 16 Current land owners; Marble & Cement Group, Conroy Smallgoods Pty Ltd, HAAE Pty Ltd, Detmold Group, Gerard Group and Kennett Pty Ltd have all benefitted from purchase of cheap land previously held for public purpose. They stand to further and substantially benefit from the rezoning of this area. Council has an obligation to think further than the gain of the current land owners. The greater good of the people of Hindmarsh and South Australia requires that financial gain to be realised by current property owners and their vested interest is viewed only within the encompassing need to create a healthy society which gives prominence to the long term needs of the current and future community. Good Urban Planning recognises History, Place and Placemaking and it plans for the priority outcomes of social and economic sustainability. 2.2.3 Topography 17 No comments 2.2.4 Heritage 17 The listed items must be protected. However, the listed items speak in small part to the history of the area and this precinct. To preserve these listed items while not preserving and building on the history destroyed by 1970's and 1980's removal of so many more similar items is a token and meaningless action. The character of the precinct must recognise and promote the history of the area by inserting character principles into the DPA that promote and support the historical and current character of the surrounding and adjacent housing and community. Since incorporation in the 1830's, Bowden and Brompton have been home to a social mix with a predominant population of workers, artisans, local industry managers and the service people that met their needs. From the 1970's there has been an influx of artists and artisans taking advantage of the cheap housing and contributing to the strong sense of community so

historically characteristic of the area. Provision for mixed uses such as artists, artisans and small cottage industries and compatible uses should be included and incentivised. We do not deny the benefits from, or to, the wide range of people looking for close-to-city housing. We recognise the 'Core Zone' concept as having value and believe that medium density housing has, to some part, been represented by the row cottages that to some diminished degree still represent Bowden and Brompton. We object to the creation of 'vertical gated communities' that separate people from the surrounding community. The above need to be recognised in the DPA Principles. Streets within and adjacent to the DPA area contain housing that is important to the character of the area. These must be protected and must not be overshadowed by new development. Bowden and Brompton have been 'open' suburbs and an 'open' community, welcoming a social mix but with real respect for those who cannot afford today's high cost housing and rental markets. Charles Sturt Council owes its residents protection from the total gentrification of Bowden and Brompton by including DPA principles that provide for a preservation of the historical social mix covering the entire spectrum of housing needs groups. The heritage of the area is more than the few historically listed items. This must be recognised by the DPA character principles and the Desired Character Statement.

2.2.5 Existing Vegetation 18 Vegetation states have been radically altered since MATS plan property purchases and the subsequent action by the industrial property owners' removal of residential properties in the 1980's & 1990's. In the 1980's, the character of Chief Street was enhanced by significant tree planting. More recent tree planting has improved the amenity of minor streets. This character should be strengthened.

2.2.6 Building Heights19 We have no substantive objection to increasing densities to meet the need of current housing markets. However, we strongly object to the imposition of building canyons along street scapes. Medium density housing requires multi storey housing which was not historically present. We do not object to building developments of up to 5 storeys in parts of the proposed zone. We do object to any overshadowing of existing housing. Developments adjacent to, or across the road, from single storey housing must be used for town houses of no more than two storey's height. This includes the length of Chief Street, East Street and Drayton Street, each of which have a predominance of single storey housing and would be 'overpowered and overshadowed' by housing higher than two storeys. Developments must be controlled by approval processes that prohibit higher than two storey developments adjacent or facing single storey houses. The DPA recommendation of 3 storeys to the West (Chief Street) is strongly opposed.

2.2.7 Environmental Assessment20 No comment

2.2.8 Adjacent and Proposed Zoning 22 Set-backs should not infringe current setbacks. Where possible, an open streetscape giving the expectation of installation and maintenance of vegetation at street frontages should be contained within the DPA principles.

2.2.9 Transport 22 We have a concern that increased traffic generated by the rezoning will adversely impact on streets that currently experience traffic flow and parking problems. Visitor parking continues to be problematic for Bowden Urban Village residents. It is also a problem in surrounding areas with traffic management devices in place, such as in West Street. Chief Street is used by tram patrons and local businesses to the exclusion of local residents. Family housing requires greater allowances for car parking than that required by one or two-bedroom housing. The recommendation to provide similar car parking rates to Bowden Urban Village is not supported. Additional car parking, and specifically visitor parking needs to be provided at greater levels than those suggested.

2.2.10 Stormwater26 No comment

2.2.11 Service Infrastructure 28 A lack of family housing predicates the recommendation for no increase in education facilities. This needs to be questioned.

2.2.13 Social Infrastructure 29 The opportunity to introduce innovative Aged Care Facilities exists. The royal commission is likely to influence the way that aged care is provided and could result in possibilities such as 'cooperatively owned and managed aged care' or new forms of buildings that promote share provision of services to people remaining in their own homes for longer periods. Street-scapes, building entries, accommodation for carers and for support services should be part of the social infrastructure envisaged. Pocket parks should be available within stone's throw of all housing not having backyards. Larger parks should be within two minutes walk. Emu park works well as an example of excellent proximity to surrounding houses. It is used at all hours of the week for a large variety of activities. Playground equipment must be shaded!

2.2.14 Consultation 31 Consultation responses would be enhanced by submissions closing on a Monday morning at 9:00 am, not Friday at 5:00. This would allow an additional weekend for people to prepare their submissions, but would not inconvenience Council.

2.2.15 Concept Plan.....32 Concept plans are only indicative. The public needs to be informed when concepts plans are amended.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm?

Yes

Q8. I found the information easy to understand

Agree

Q9. I had adequate notice to get involved with the consultation

Disagree

Q10. I was satisfied that I was provided with adequate opportunities to have my say

Disagree

Q11. How could the consultation/activity be improved?

Longer notice is required for preparation of submissions in response to a significant DPA such as this. Lodgement should be on Monday morning 9am (or Tuesday on a long weekend) to allow people extra time to submit. There is no purpose in having submissions sit in an in-box all weekend. Those preparing them must manage work and family lives while preparing submissions. It places unneeded strains on all aspects of life. We have been appreciative of planning officers' help in the process. Thanks



Respondent No: 12

Login: gheath

Email: [REDACTED]

Responded At: Sep 28, 2018 15:21:56 pm

Last Seen: Sep 28, 2018 05:42:53 am

IP Address: 127.0.0.1

Q1. Name Georgia Heath

Q2. Postal Address [REDACTED]

Q3. What is your interest in this project? resident

Q4. Please specify 'other' not answered

Q5. Please select your age category 25-39

Q6. Provide your written submission on the DPA here.

The inclusion of transitional height limits makes sense as this avoid hard urban edge, however along the northern edge of the study area (eighth street) zoning currently envisages 1-3 storeys. As such this height limit should be brought up to three storeys in the draft DPA to maximise development potential and maintain an appropriate edge. The zone policy should also clarify, where height is expressed as storeys, that this is limited to above ground levels. This avoids say, the development of two storey house with a basement being considered as a three storey building.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm? No

Q8. I found the information easy to understand Agree

Q9. I had adequate notice to get involved with the consultation Agree

Q10. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q11. How could the consultation/activity be improved?

Consultation on the DPA has been appropriate.



Respondent No: 13

Login: cking

Email: [REDACTED]

Responded At: Sep 28, 2018 15:41:02 pm

Last Seen: Sep 28, 2018 06:05:26 am

IP Address: 127.0.0.1

Q1. Name Chad King

Q2. Postal Address

Q3. What is your interest in this project? business

Q4. Please specify 'other' not answered

Q5. Please select your age category 25-39

Q6. Provide your written submission on the DPA here.

During infrastructure negotiations, close attention should be paid to the impact of the recent Bowden one way project and seek to undertake appropriate streetscape upgrades to improve amenity. This should take into account availability of off street parking, stormwater management, waste management and sound urban design principles.

Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this DPA on Monday 15 October 2018 at 6pm? No

Q8. I found the information easy to understand Agree

Q9. I had adequate notice to get involved with the consultation Agree

Q10. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q11. How could the consultation/activity be improved?

Consultation was appropriate.

28 September 2018

Mr Paul Sutton
Chief Executive Officer
City of Charles Sturt
PO Box 1
Woodville SA 5011

Attention : The Chief Executive Officer

By email : psutton@charlessturt.sa.gov.au

RE – DRAFT Bowden – Brompton Mixed Use (Residential and Commercial) DPA Submission.

Dear Paul,

I thank you for providing Detmold the opportunity to comment on the Draft Bowden – Brompton Mixed Use (Residential and Commercial) Development Plan Amendment (DPA) that is on public exhibition until 28 September 2018. This submission is made on behalf of Detmold Pty Ltd.

The Detmold Group controls some 4.01 hectares of land located on the north-eastern edge of the proposed rezoning adjoining Hawker and Chief Streets to the north, and Third and Drayton Streets to the south-west. We refer also to the submission made by Holmes Dyer which was also made on behalf of Detmold and a number of other affected land owners.

Detmold's position on the DPA

Detmold strongly supports the zoning change proposed by the DPA. We encourage the Council and Minister to proceed expeditiously with the rezoning process, subject to the suggestions and other matters raised in the submission from Holmes Dyer made on behalf of us and other affected land owners, necessary to facilitate orderly, market responsive, affordable residential and mixed-use development.

In particular, Detmold wholly supports the proposed policy change to facilitate higher density residential and mixed-use development at the affected land.

We strongly believe that the affected land is ideal for the kinds of higher density residential and sympathetic mixed-use development proposed by the DPA.

The land subject to the rezoning including 45 Chief Street, Brompton is very well located close to the Adelaide central business district, public transport and has significant potential as a high quality and attractive residential and mixed-use hub.

We concur with the Holmes Dyer submission and the DPA investigations undertaken by FYFE to the effect that the land can be economically serviced with appropriate infrastructure and is well suited to residential infill development.

Specific further amendments to the DPA

We respectfully agree in general terms with the submissions made by Holmes Dyer on behalf of affected landowners including Detmold.

In particular, Detmold emphasises that some further planning policy changes as suggested by Holmes Dyer are appropriate to ensure that the DPA provides flexible planning policies that leave sufficient room for best practice and innovative design and engineering. Critically, we consider it is important that the DPA does not unduly limit or restrict future appropriate, high density residential and mixed-use development in terms of height or by being too restrictive on locations of open space, vehicular access and the management of short-term impacts due to this transitioning area.

We support the Holmes Dyer submissions generally and further, we wish to re-iterate the following issues and suggestions raised in that submission:

- 1) The DPA should not be too rigid or prescriptive about limiting building height. Changes should be made to the concept plan in this regard. Some limit is of course sensible, but the current proposed heights are likely to unduly limit reasonable development at the densities envisaged by the DPA.
- 2) It is critical that multi-level residential development (including more than one multi-level dwelling or building containing dwellings on a site) be allowed to occur as Category 1 development to avoid delays and inefficiencies in developing the area in the manner otherwise envisaged by the DPA.
- 3) Vehicular access points to future development in the affected area should be left to master planning informed by traffic planning, rather than being too restricted by planning policy at this early stage.

- 4) Likewise, open space areas can be left to the master planning of the infill area and once more detailed investigations have taken place to determine the most desirable areas and subject to the optimum commercial outcomes for the affected area.
- 5) Temporary impact mitigation measures in some dwellings may be appropriate as the area transitions away from industrial uses, but those measures should be left to the individual application(s) rather than being too heavily prescribed in the DPA.
- 6) Stormwater can be dealt with on a site-by-site basis and there are countless ways of managing it that can and should be left to future applications, rather than being prescribed ahead of time by the DPA.
- 7) We have suggested, via Holmes Dyer a number of specific policy amendments and changes to the Concept Plan that we support. We are strongly of the view that the Concept Plan needs to better reflect the underlying intent of the re-zoning including as to dwelling height and densities and the matters above.

We believe that the revised Concept Plan (copy attached) can provide uplift, enable densities to change in response to changing circumstances and provide early infrastructure delivery opportunities. The revised Concept Plan will allow efficient use of land and provides increased potential to support local services, businesses and facilities. We urge the Council to adopt the intent of that amended Concept Plan.

Summary and request to be heard

We commend the submissions of Holmes Dyer on behalf of the consortium of landowners to the Council. We seek that those submissions and the above high-level comments be carefully considered and that the Council make further amendments to the DPA on the basis of those submissions prior to finalising the DPA and approaching the Minister.

Detmold wishes to be heard personally or by representative at the public hearing scheduled for Monday 15 October 2018 at 6pm. Please confirm that Detmold will be given the opportunity to be heard at that public hearing.

I once again thank you for the opportunity to put forward this submission and we look forward to a positive and prompt response to this rezoning.



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Yours faithfully

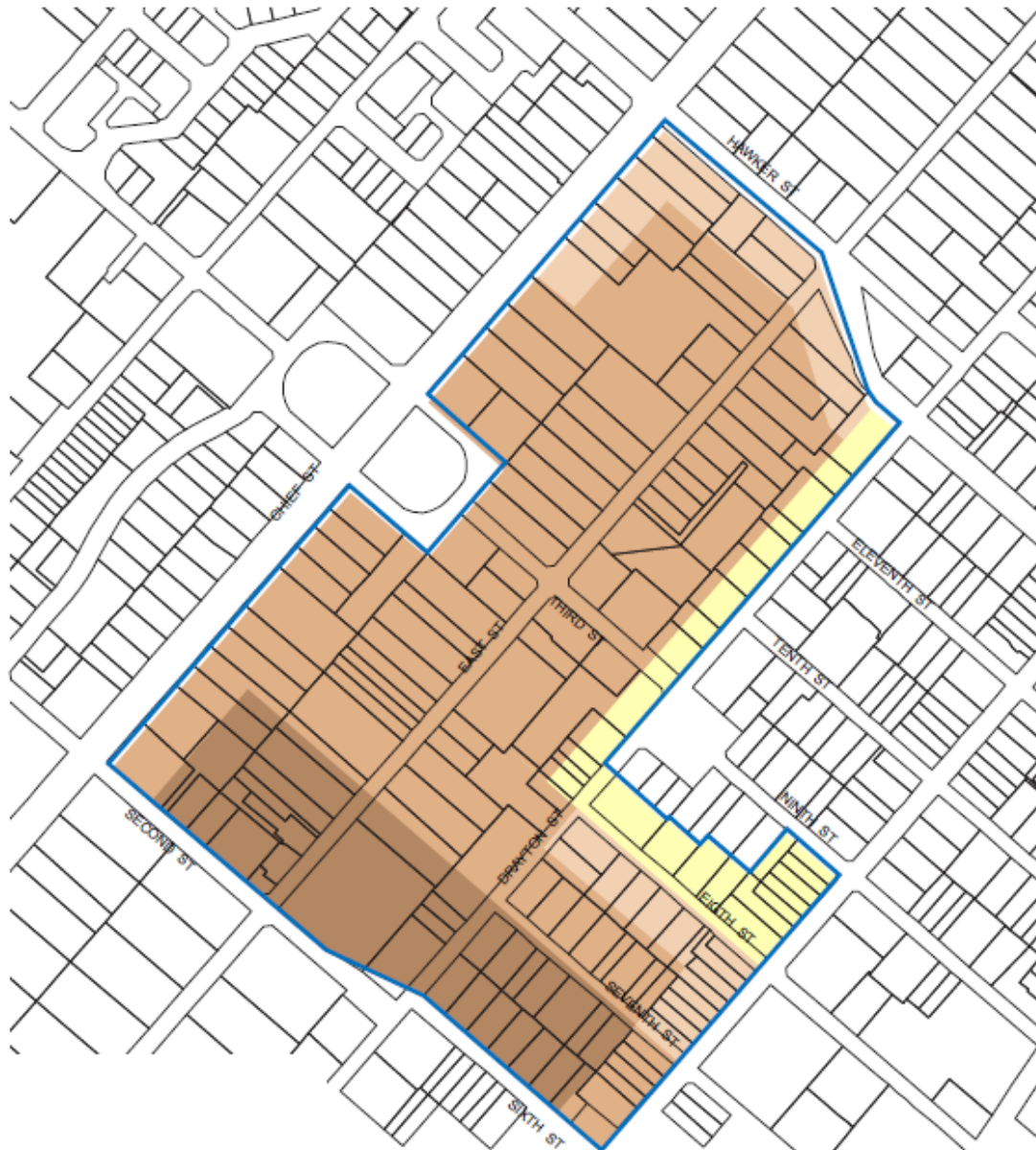
per

Alfonzo Ianniello

CEO

Attachment - Revised Concept Plan

Attachment – Revised Concept Plan



CONCEPT PLAN